

CLERK OF THE COURT

Electronically Filed  
Dec 27 2013 02:01 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

1 NOAS  
2 STEVEN T. JAFFE, ESQ.  
3 [sjaffe@lawhjc.com](mailto:sjaffe@lawhjc.com)  
4 Nevada Bar No. 007035  
5 JACOB S. SMITH, ESQ.  
6 [jsmith@lawhjc.com](mailto:jsmith@lawhjc.com)  
7 Nevada Bar No. 010231

8  
9 HALL JAFFE & CLAYTON, LLP  
10 7425 PEAK DRIVE  
11 LAS VEGAS, NEVADA 89128  
12 (702) 316-4111  
13 FAX (702) 316-4114

14 *Attorneys for Defendant*  
15 *Raymond R. Khoury*

16 DISTRICT COURT  
17 CLARK COUNTY, NEVADA

18 MARGARET G. SEASTRAND,  
19  
20 Plaintiff,

21 vs.

22 RAYMOND RIAD KHOURY; DOES 1  
23 through 10; and ROE ENTITIES 11 through  
24 20, inclusive,

25 Defendants.

CASE NO. A-11-636515-C  
DEPT NO. XXX

NOTICE OF APPEAL

26 Please take notice that Defendant, RAYMOND RIAD KHOURY, by and through his attorneys of  
27 record, STEVEN T. JAFFE, ESQ. and JACOB S. SMITH, ESQ., of the law firm of HALL JAFFE &  
28 CLAYTON, LLP, hereby appeals to the Supreme Court of Nevada from:

- 29 1. All judgments and orders in this case;
- 30 2. Judgment Upon the Jury Verdict, filed November 5, 2013; and

31 ///

32 ///

33 ///

34 ///

35 ///

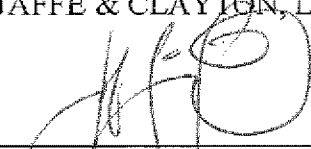
36 ///

1 3. All rulings and orders made appealable by any of the foregoing.

2 DATED this 23 day of December, 2013.

3 HALL JAFFE & CLAYTON, LLP

4  
5 By:

  
STEVEN T. JAFFE, ESQ.  
Nevada Bar No. 007035  
JACOB S. SMITH, ESQ.  
Nevada Bar No. 010231  
7425 Peak Drive  
Las Vegas, Nevada 89128  
*Attorneys for Defendant*  
*Raymond R. Khoury*

# **EXHIBIT “A”**

Electronically Filed  
11/06/2013 10:10:02 AM  
11/06/2013 10:10:02 AM

  
CLERK OF THE COURT

1 NJUD  
2 BENJAMIN P. CLOWARD, ESQ.  
3 Nevada Bar No. 11087  
4 Utah Bar No. 12336  
5 **RICHARD HARRIS LAW FIRM**  
6 801 South Fourth Street  
7 Las Vegas, Nevada 89101  
8 *Attorney for Plaintiff*

DISTRICT COURT  
CLARK COUNTY, NEVADA

9  
10 MARGARET SEASTRAND,  
11 Plaintiff,

CASE NO: A-11-636515-C  
DEPT NO: XXX

12 vs.

13 RAYMOND RIAD KHOURY; DOES 1  
14 through 10; and ROE ENTITIES 11 through  
15 20 inclusive,


16 Defendants.

17  
18 NOTICE OF ENTRY OF JUDGMENT

19 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that a Judgment Upon  
20 the Jury Verdict was entered in the above entitled matter on the 5<sup>th</sup> day of November, 2013, a  
21 copy of which is attached hereto as Exhibit "1."

22  
23 DATED this 6<sup>th</sup> day of November, 2013.

24 **RICHARD HARRIS LAW FIRM**

25   
26 BENJAMIN P. CLOWARD, ESQ.  
27 Nevada Bar No. 11087  
28 ALISON M. BRASIER, ESQ.  
Nevada Bar No. 10522  
801 S. Fourth Street  
Las Vegas, Nevada 89101

CERTIFICATE OF SERVICE

Pursuant to NRCp 5(b), I hereby certify that I am an employee of RICHARD HARRIS LAW FIRM and that on the 10 day of November 2013, I caused the foregoing NOTICE OF ENTRY OF JUDGMENT to be served as follows:

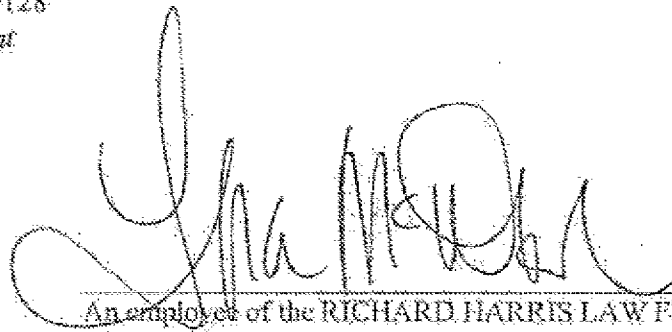
☒ by placing a true and correct copy of the same to be deposited for mailing in the U.S. Mail at Las Vegas, Nevada, enclosed in a sealed envelope upon which first class postage was fully prepaid; and/or

☒ pursuant to EDCR 7.26, by sending it via facsimile; and/or

☐ by hand delivery

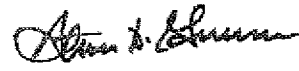
to the attorneys listed below:

STEVEN T. JAFFE, ESQ.  
HALL, JAFFE & CLAYTON, LLP  
7425 Peak Drive  
Las Vegas, Nevada 89128  
*Attorneys for Defendant*



An employee of the RICHARD HARRIS LAW FIRM

Electronically Filed  
Electronically Filed  
11/05/2013 01:29:19 PM



CLERK OF THE COURT

JGJV  
BENJAMIN P. CLOWARD, ESQ.  
Nevada Bar No. 11087  
ALISON M. BRASIER, ESQ.  
Nevada Bar No. 10522  
RICHARD HARRIS LAW FIRM  
801 South Fourth Street  
Las Vegas, Nevada 89101  
Phone (702) 444-4444  
Fax (702) 444-4455  
E-Mail: Benjamin@RichardHarrisLaw.com  
*Attorneys for Plaintiff*

DISTRICT COURT

CLARK COUNTY, NEVADA

MARGARET SEASTRAND,

Plaintiff,

vs.

RAYMOND RIAD KHOURY; DOES 1  
through 10; and ROE ENTITIES 11 through  
20 inclusive.

Defendants.

CASE NO: A-11-636515-C  
DEPT NO: XXX

JUDGMENT UPON THE JURY VERDICT

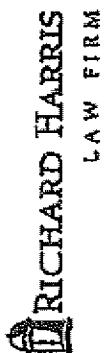
This action came on for trial before the court and the jury, the Honorable, District Judge,  
presiding, and the issues having been duly tried and the jury having duly rendered its verdict.<sup>1</sup>

IT IS ORDERED AND ADJUDGED that Plaintiff, MARGARET SEASTRAND, have  
and recover of Defendant, RAYMOND RIAD KHOURY, the following sum:

Past Medical Expenses:	\$ 236,794.00
Future Medical Expenses:	\$113,725.00
Past Loss of Household Services:	\$ 32,996.00

Exhibit 1: Jury Verdict

<input type="checkbox"/> Verdict by Dis	<input type="checkbox"/> Slip Dis	<input type="checkbox"/> Sum. Adgmt
<input type="checkbox"/> Verdict by (stat) Dis	<input type="checkbox"/> Slip Adgmt	<input type="checkbox"/> Non-Jury Trial
<input type="checkbox"/> Verdict by Ass Award	<input type="checkbox"/> Default Adgmt	<input type="checkbox"/> Jury Trial
<input type="checkbox"/> Verdict by (by defl)	<input type="checkbox"/> Transferred	



Future Loss of Household Services:	\$183,238.00
Past Physical and Mental Pain, Suffering, Anguish and Disability	\$ 85,013.00
Future Physical and Mental Pain, Suffering, Anguish and Disability	<u>\$ 68,010.00</u>
<b>Total Damages</b>	<b>\$719,776.00</b>

IT IS FURTHER ORDERED AND ADJUDGED that Plaintiff's past damages shall bear Pre-Judgment interest in accordance with Lee v. Ball, 116 P.3d 64, (2005) at the rate of 3.25% per annum plus 2%<sup>2</sup> from the date of service of the Summons and Complaint<sup>3</sup>, on June 1, 2011, through July 26, 2013, as follows:

**PRE-JUDGMENT INTEREST ON PAST MEDICAL DAMAGES:**

06/01/2011 through 07/26/13 = \$27,177.04  
[(787 days) at (prime rate (3.25%) plus 2 percent = 5.25%)]  
[Interest is approximately \$4.13 per day]

**PRE-JUDGMENT INTEREST ON PAST LOSS OF HOUSEHOLD SERVICES:**

06/01/2011 through 07/26/13 = \$3,786.98  
[(787 days) at (prime rate (3.25%) plus 2 percent = 5.25%)]  
[Interest is approximately \$4.13 per day]

**PRE-JUDGMENT INTEREST ON PAST PHYSICAL AND MENTAL PAIN, SUFFERING, ANGUISH AND DISABILITY:**

06/01/2011 through 07/26/2013 = \$9,757.01  
[(787 days) at (prime rate (3.25%) plus 2 percent = 5.25%)]  
[Interest is approximately \$4.13 per day]

<sup>2</sup> Exhibit 2: Prime Rate as of January 1, 2013

<sup>3</sup> Exhibit 3: Affidavit of Service

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

NOW, THEREFORE, Judgment Upon the Verdict in favor of the Plaintiff is as follows:

MARGARET SEASTRAND is hereby given Seven Hundred Sixty Thousand Four  
Hundred Ninety Seven and 03/100 dollars (\$760,497.03), which shall bear post-interest at the  
current rate of 5.25% per day, until satisfied.

DATED THIS 1<sup>st</sup> day of November, 2013.

  
DISTRICT COURT JUDGE As

*Respectfully submitted:*

**RICHARD HARRIS LAW FIRM**



BENJAMIN P. CLOWARD, ESQ.

Nevada Bar No. 11087

ALISON M. BRASIER, ESQ.

Nevada Bar No. 10522

801 South Fourth Street

Las Vegas, NV 89101

*Attorneys for Plaintiff*


 RICHARD HARRIS  
LAW FIRM



EXHIBIT "1"

DISTRICT COURT

CLARK COUNTY, NEVADA

FILED IN OPEN COURT  
STEVEN D. GRIERSON  
CLERK OF THE COURT

JUL 26 2013

MARGARET G. SEASTRAND,

Plaintiff,

CASE NO. A-11-636515-C  
DEPT NO. XXX

ALICE POLCH DEPUTY

vs.

RAYMOND RIAD KHOURY; DOES I  
through 10; and ROE ENTITIES 11 through  
20, inclusive,

VERDICT

Defendant

We, the jury in the above-entitled action, find for the Plaintiff, Margaret  
Seastrand, and against the Defendant, Raymond Khoury, and find that the Plaintiff  
is awarded the following amounts:

Past Medical Expenses: \$ 236,794

Future Medical Expenses: \$ 113,725

Past Loss of Household Services: \$ 32,996

Future Loss of Household Services: \$ 183,238

Past Physical and Mental Pain,

Suffering, Aguish and Disability: \$ 45,013

Future Physical and Mental Pain,

Suffering, Anguish and Disability: \$ 68,010

DATED this 26 day of July, 2013.

FOREMAN

EXHIBIT "2"

## PRIME INTEREST RATE

NRS 99.040(1) requires:

*"When there is no express contract in writing fixing a different rate of interest, interest must be allowed at a rate equal to the prime rate at the largest bank in Nevada, as ascertained by the Commissioner of Financial Institutions, on January 1, or July 1, as the case may be, immediately preceding the date of the transaction, plus 2 percent, upon all money from the time it becomes due, . . ."*

Following is the prime rate as ascertained by the Commissioner of Financial Institutions:

January 1, 2013	3.25%	July 1, 2012	3.25%
January 1, 2012	3.25%	July 1, 2011	3.25%
January 1, 2011	3.25%	July 1, 2010	3.25%
January 1, 2010	3.25%	July 1, 2009	3.25%
January 1, 2009	3.25%	July 1, 2008	5.00%
January 1, 2008	7.25%	July 1, 2007	8.25%
January 1, 2007	8.25%	July 1, 2006	8.25%
January 1, 2006	7.25%	July 1, 2005	6.25%
January 1, 2005	5.25%	July 1, 2004	4.25%
January 1, 2004	4.00%	July 1, 2003	4.00%
January 1, 2003	4.25%	July 1, 2002	4.75%
January 1, 2002	4.75%	July 1, 2001	6.75%
January 1, 2001	9.50%	July 1, 2000	9.50%
January 1, 2000	8.25%	July 1, 1999	7.75%
January 1, 1999	7.75%	July 1, 1998	8.50%
January 1, 1998	8.50%	July 1, 1997	8.50%
January 1, 1997	8.25%	July 1, 1996	8.25%
January 1, 1996	8.50%	July 1, 1995	9.00%
January 1, 1995	8.50%	July 1, 1994	7.25%
January 1, 1994	6.00%	July 1, 1993	6.00%
January 1, 1993	6.00%	July 1, 1992	6.50%
January 1, 1992	6.50%	July 1, 1991	8.50%
January 1, 1991	10.00%	July 1, 1990	10.00%
January 1, 1990	10.50%	July 1, 1989	11.00%
January 1, 1989	10.50%	July 1, 1988	9.00%
January 1, 1988	8.75%	July 1, 1987	8.25%
January 1, 1987	Not Available		

\* Attorney General Opinion No. 98-20:

*If clearly authorized by the creditor, a collection agency may collect whatever interest on a debt its creditor would be authorized to impose. A collection agency may not impose interest on any account or debt where the creditor has agreed not to impose interest or has otherwise indicated an intent not to collect interest. Simple interest may be imposed at the rate established in NRS 99.040 from the date the debt becomes due on any debt where there is no written contract fixing a different rate of interest, unless the account is an open or store accounts as discussed herein. In the case of open or store accounts, interest may be imposed or awarded only by a court of competent jurisdiction in an action over the debt.*



EXHIBIT "3"

Legal Process Service, 626 S. 8th Street, Las Vegas, NV 89101 (702) 471-7255

1 AFFT DIST COURT CLARK COUNTY STATE OF NEVADA

2 CASE NO.: A-11-636615-C DEPT. XXX

3 Richard Harris Law Firm

4 Shoshana Kunin-Leavitt, Esq.

5 801 S. 4th St.

6 Las Vegas, NV 89101

7 State Bar No.: 11625

8 Attorney(s) for: Plaintiff(s)

9 Margaret G. Seastrand,

Date:

Time:

10 vs

Plaintiff(s)

11 Raymond Riad Khoury, et al.

AFFIDAVIT OF SERVICE

Defendant(s)

12 Vicky Peltier, being duly sworn deposes and says: That at all times herein affiant was and is a citizen of the United  
13 States, over 18 years of age, licensed to serve civil process in the State of Nevada under license #604, and not a  
14 party to or interested in the proceeding in which this affidavit is made. The affiant received 1 copy(ies) of the:

15 Summons & Complaint

16 on the 1st day of June, 2011 and served the same on the 1st day of June, 2011 at 7:51PM by:

17 1. delivering and leaving a copy with the Defendant(s), at \_\_\_\_\_.

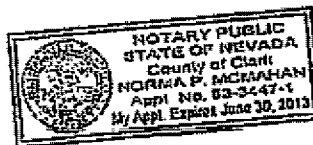
18 2. serving the Defendant(s), Raymond Riad Khoury by personally delivering and leaving a copy with

19 Lesley Khoury, Wife, a person of suitable age and discretion residing at the Defendant(s)'s usual place of abode  
20 located at 9190 W. Ann Rd., Las Vegas, NV 89149.

21 3. serving the Defendant(s), \_\_\_\_\_ by personally delivering and leaving a copy at: \_\_\_\_\_.

22 a. with \_\_\_\_\_ as \_\_\_\_\_ an agent lawfully designated by statute to accept service of process;

23 b. with \_\_\_\_\_ pursuant to NRS 14.020 as a person of suitable age and and discretion at the above address, which  
24 address is the address of the registered agent as shown on the current certificate of designation filed with the  
25 Secretary of State.



26 State of Nevada, County of Clark

27 SUBSCRIBED AND SWORN to before me on this

28 2nd day of June, 2011

29 Notary Public

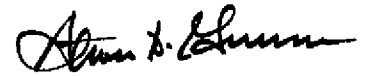
30 Affiant - Vicky Peltier

#R-058000

Legal Process Service

License # 604

WorkOrderNo 1104672



CLERK OF THE COURT

**CERT**  
STEVEN T. JAFFE, ESQ.  
[sjaffe@lawhjc.com](mailto:sjaffe@lawhjc.com)  
Nevada Bar No. 007035  
JACOB S. SMITH, ESQ.  
[jsmith@lawhjc.com](mailto:jsmith@lawhjc.com)  
Nevada Bar No. 010231

**HALL JAFFE & CLAYTON, LLP**  
7425 PEAK DRIVE  
LAS VEGAS, NEVADA 89128  
(702) 316-4111  
FAX (702) 316-4114

*Attorneys for Defendant*  
*Raymond R. Khoury*

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

MARGARET G. SEASTRAND,  
Plaintiff,

vs.

RAYMOND RIAD KHOURY; DOES 1  
through 10; and ROE ENTITIES 11 through  
20, inclusive,

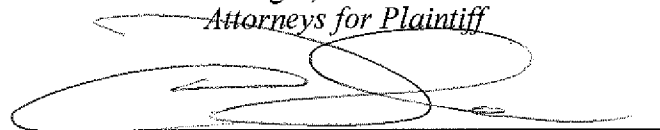
Defendants.

CASE NO. A-11-636515-C  
DEPT NO. XXX

**CERTIFICATE OF MAILING**

Pursuant to N.R.C.P. 5(b), I hereby certify that service of the foregoing **NOTICE OF APPEAL** and **NOTICE OF FILING BOND FOR COSTS ON APPEAL** were made on this 24<sup>th</sup> day of December, 2013, by depositing a true and correct copy of the same by U.S. Mail in Las Vegas, Nevada, addressed, stamped, and mailed to the following:

Richard A. Harris, Esq.  
Alison Brasier, Esq.  
RICHARD HARRIS LAW FIRM  
801 S. Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*



An Employee of  
HALL JAFFE & CLAYTON, LLP

DEPARTMENT 30  
**CASE SUMMARY**  
**CASE NO. A-11-636515-C**

**Margaret Seastrand, Plaintiff(s)**  
**vs.**  
**Raymond Khoury, Defendant(s)**

§  
§  
§  
§  
§

Location: **Department 30**  
Judicial Officer: **Wiese, Jerry A**  
Filed on: **03/08/2011**  
Cross-Reference Case **A636515**  
Number:

---

**CASE INFORMATION**

---

**Statistical Closures**  
11/05/2013     Jury Trial

Case Type: **Negligence - Auto**  
Case Flags: **Appealed to Supreme Court**  
**Jury Demand Filed**  
**Arbitration Exemption Granted**

---

**DATE**

**CASE ASSIGNMENT**

---

**Current Case Assignment**

Case Number	A-11-636515-C
Court	Department 30
Date Assigned	03/08/2011
Judicial Officer	Wiese, Jerry A

---

**PARTY INFORMATION**

---

**Plaintiff**            **Seastrand, Margaret G.**

*Lead Attorneys*  
**Brasier, Allison M.**  
*Retained*  
702-288-7200(W)

**Defendant**            **Khoury, Raymond Riad**

**Smith, Jacob S.**  
*Retained*  
702-233-5040(W)






---

**DATE**

**EVENTS & ORDERS OF THE COURT**









**INDEX**

---

03/08/2011	Case Opened	
03/08/2011	 Complaint Filed By: Plaintiff Seastrand, Margaret G. <i>Complaint</i>	
06/10/2011	 Summons Filed by: Plaintiff Seastrand, Margaret G. <i>Summons - Civil</i>	
06/21/2011	 Answer to Complaint Filed by: Defendant Khoury, Raymond Riad <i>Answer to Complaint</i>	
06/21/2011	 Demand for Jury Trial Filed By: Defendant Khoury, Raymond Riad <i>Demand for Jury Trial</i>	
06/21/2011	 Initial Appearance Fee Disclosure Filed By: Defendant Khoury, Raymond Riad <i>Initial Appearance Fee Disclosure (NRS Chapter 19)</i>	
07/27/2011		



DEPARTMENT 30  
**CASE SUMMARY**  
**CASE NO. A-11-636515-C**

	 Objection Filed By: Plaintiff Seastrand, Margaret G. <i>Plaintiff's Objections to Defendant's Initial NRCP 16.1 Disclosure and NRCP 16.1 (a)(3) Pre-trial Disclosure</i>
07/27/2011	 Commissioners Decision on Request for Exemption - Granted Party: Plaintiff Seastrand, Margaret G. <i>Commissioner s Decision on Request for Exemption</i>
08/23/2011	 Joint Case Conference Report Filed By: Plaintiff Seastrand, Margaret G. <i>Joint Case Conference Report</i>
09/16/2011	 Scheduling Order <i>Scheduling Order</i>
09/27/2011	 Order Setting Civil Jury Trial, Pre-Trial, and Calendar Call <i>Order Setting Civil Jury Trial, Pre-Trial, Conference And Calendar Call</i>
05/11/2012	 Stipulation to Extend Discovery Party: Defendant Khoury, Raymond Riad <i>Stipulation and Order to Extend Discovery Deadlines Pursuant to EDCR 2.35 (First Request)</i>
05/14/2012	 Notice of Entry of Order Filed By: Defendant Khoury, Raymond Riad <i>Notice of Entry of Order</i>
07/24/2012	 Amended Order Setting Jury Trial Party: Plaintiff Seastrand, Margaret G. <i>Amended Order Setting Civil Jury Trial, Pre-Trial Conference And Calendar Call</i>
07/24/2012	 Stipulation to Extend Discovery Party: Defendant Khoury, Raymond Riad <i>Stipulation and Order to Extend Discovery Discovery Deadlines Pursuant to EDCR 2.35 (Second Request)</i>
08/02/2012	 Notice of Entry of Order Filed By: Defendant Khoury, Raymond Riad <i>Notice of Entry of Order</i>
09/19/2012	 Notice of Change of Address Filed By: Defendant Khoury, Raymond Riad <i>Notice of Change of Address</i>
10/15/2012	<b>CANCELED Pre Trial Conference (10:30 AM) (Judicial Officer: Wiese, Jerry A)</b> <i>Vacated - per Commissioner</i>
10/18/2012	 Motion in Limine Filed By: Defendant Khoury, Raymond Riad <i>Defendant's Motion in Limine No. 1 to Preclude Dr. Gross from Testifying re: Future Cervical Surgery</i>
10/22/2012	 Application for Issuance of Commission to Take Deposition Party: Defendant Khoury, Raymond Riad

# CASE SUMMARY

## CASE No. A-11-636515-C



*Application for Issuance of Commission to Take Deposition Outside the State of Nevada*

11/01/2012	 Motion to Compel Filed By: Defendant Khoury, Raymond Riad <i>Defendant's Motion to Compel Discovery Responses and Production of Documents re: Plaintiff's Medical Liens</i>
11/05/2012	<b>CANCELED Calendar Call (10:30 AM) (Judicial Officer: Wiese, Jerry A)</b> <i>Vacated - per Commissioner</i>
11/13/2012	 Stipulation and Order Filed by: Defendant Khoury, Raymond Riad <i>Stipulation and Order Precluding Dr. Jeffrey Gross from Testifying re: Future Cervical Surgery</i>
11/13/2012	<b>CANCELED Jury Trial (1:30 PM) (Judicial Officer: Wiese, Jerry A)</b> <i>Vacated - per Commissioner</i>
11/20/2012	 Opposition to Motion to Compel Filed By: Plaintiff Seastrand, Margaret G. <i>Plaintiff's Opposition to Defendant's Motion to Compel Discovery Responses and Production of Documents re: Plaintiff's Medical Liens</i>
11/26/2012	<b>CANCELED Motion in Limine (9:00 AM) (Judicial Officer: Wiese, Jerry A)</b> <i>Vacated - per Stipulation and Order</i> <i>Defendant's Motion in Limine No. 1 to Preclude Dr. Gross from Testifying re: Future Cervical Surgery</i>
11/29/2012	 Notice of Entry of Stipulation and Order Filed By: Defendant Khoury, Raymond Riad <i>Notice of Entry of Stipulation and Order</i>
11/30/2012	 Reply to Opposition Filed by: Defendant Khoury, Raymond Riad <i>Defendant's Reply to Plaintiff's Motion to Compel Discovery Responses and Production of Documents re: Plaintiff's Medical Liens</i>
12/03/2012	 Motion for Partial Summary Judgment Filed By: Defendant Khoury, Raymond Riad <i>Defendant's Motion for Partial Summary Judgment as to Lost Profits of Hollywood Kids Academy</i>
12/05/2012	 Notice of Hearing Filed By: Defendant Khoury, Raymond Riad <i>Notice of Hearing on Defendant's Motion for Partial Summary Judgment as to Lost Profits of Hollywood Kids Academy</i>
12/05/2012	 <b>Motion to Compel (9:00 AM) (Judicial Officer: Bulla, Bonnie)</b> <i>Defendant's Motion to Compel Discovery Responses and Production of Documents re: Plaintiff's Medical Liens</i>
12/28/2012	 Stipulation and Order Filed by: Defendant Khoury, Raymond Riad <i>Stipulation and Order to Re-Open and/or Extend Discovery Cutoff Pursuant to EDCR 2.35</i>
12/31/2012	 Notice of Entry of Stipulation and Order

DEPARTMENT 30  
**CASE SUMMARY**  
**CASE NO. A-11-636515-C**

	Filed By: Defendant Khoury, Raymond Riad <i>Notice of Entry of Stipulation and Order to Re-Open and/or Extend Discovery Cutoff Pursuant to EDCR 2.35</i>
01/04/2013	 <b>Status Check: Compliance/Sanctions</b> (11:00 AM) (Judicial Officer: Bulla, Bonnie)
01/14/2013	<b>CANCELED Pre Trial Conference</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Vacated - per Commissioner</i>
01/16/2013	 Amended Order Setting Jury Trial <i>Second Amended Order Setting Civil Jury Trial, Pre-Trial Conference and Calendar Call</i>
01/16/2013	 Stipulation and Order for Dismissal Filed by: Defendant Khoury, Raymond Riad <i>Stipulation and Order Dismissing Plaintiff's Claim for Lost Business Profits of Hollywood Kids, LLC dba Hollywood Kids Academy</i>
01/16/2013	<b>Order of Dismissal</b> (Judicial Officer: Wiese, Jerry A) Debtors: Margaret G. Seastrand (Plaintiff) Creditors: Raymond Riad Khoury (Defendant) Judgment: 01/16/2013, Docketed: 01/23/2013 Comment: Certain Claims
01/17/2013	 Notice of Entry of Stipulation and Order Filed By: Defendant Khoury, Raymond Riad <i>Notice of Entry of Stipulation and Order Dismissing Plaintiff's Claim for Lost Business Profits of Hollywood Kids, LLC d/b/a Hollywood Kids Academy</i>
01/17/2013	<b>CANCELED Motion for Partial Summary Judgment</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Vacated - per Stipulation and Order</i> <i>Defendant's Motion for Partial Summary Judgment as to Lost Profits of Hollywood Kids Academy</i>
01/18/2013	 Application for Issuance of Commission to Take Deposition Party: Defendant Khoury, Raymond Riad <i>Application for Issuance of Commission To Take Deposition Outside The State of Nevada</i>
01/22/2013	 Commission to Take Deposition Outside the State of Nevada Filed By: Defendant Khoury, Raymond Riad <i>Commission to Take Deposition Outside The State of Nevada</i>
02/01/2013	<b>CANCELED Status Check: Compliance</b> (11:00 AM) (Judicial Officer: Bulla, Bonnie) <i>Vacated - per Commissioner</i>
02/04/2013	<b>CANCELED Calendar Call</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Vacated - per Commissioner</i>
02/11/2013	<b>CANCELED Jury Trial</b> (10:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Vacated - per Commissioner</i>
03/14/2013	 Discovery Commissioners Report and Recommendations Filed By: Defendant Khoury, Raymond Riad <i>Discovery Commissioner's Report and Recommendations</i>
03/14/2013	 Discovery Commissioners Report and Recommendations <i>Discovery Commissioners Report and Recommendations</i>

DEPARTMENT 30  
**CASE SUMMARY**  
**CASE No. A-11-636515-C**

03/14/2013	<b>Sanctions</b> (Judicial Officer: Wiese, Jerry A) Debtors: Jacob S Smith (Other) Creditors: Legal Aid of Southern Nevada's Pro Bono Project (Other) Judgment: 03/14/2013, Docketed: 03/21/2013 Total Judgment: 100.00
04/04/2013	 Notice of Entry Filed By: Defendant Khoury, Raymond Riad <i>Notice of Entry of Discovery Commissioner's Report and Recommendations</i>
04/29/2013	 Omnibus Motion In Limine Filed by: Plaintiff Seastrand, Margaret G. <i>Plaintiff's Omnibus Motions in Limine</i>
04/29/2013	 <b>Pre Trial Conference</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A)
04/30/2013	 Stipulation and Order Filed by: Defendant Khoury, Raymond Riad <i>Stipulation and Order to Continue Trial</i>
04/30/2013	 Notice of Entry of Stipulation and Order Filed By: Defendant Khoury, Raymond Riad <i>Notice of Entry of Stipulation and Order to Continue Trial</i>
05/01/2013	 Motion in Limine Filed By: Defendant Khoury, Raymond Riad <i>Defendant's Motion in Limine No. 1: To Limit Physicians to Opinions Stated in Their Clinical Records, Depositions, and/or Expert Reports, If Any</i>
05/01/2013	 Motion in Limine Filed By: Defendant Khoury, Raymond Riad <i>Defendant's Motion in Limine No. 2: To Preclude Any Treating Physician Who Did Not Provide An Expert Report from Improperly Rebutting Defense Experts</i>
05/01/2013	 Motion in Limine Filed By: Defendant Khoury, Raymond Riad <i>Defendant's Motion in Limine No. 3: To Admit Evidence of Medical Liens</i>
05/01/2013	 Motion in Limine Filed By: Defendant Khoury, Raymond Riad <i>Defendant's Motion in Limine No. 4: To Limit Plaintiff's Presentation of Past Medical Special Damages at Trial to Amounts Actually Paid by or on Behalf of Plaintiff</i>
05/01/2013	 Motion in Limine Filed By: Defendant Khoury, Raymond Riad <i>Defendant's Motion in Limine No. 5 to Preclude Plaintiff's Experts from Commenting on, Referring to, or Rebutting any Defense Expert Prior to Defense Expert's Testimony</i>
05/01/2013	 Motion in Limine Filed By: Defendant Khoury, Raymond Riad <i>Defendant's Motion in Limine No. 6: to Preclude Video and/or Animated Depictions of Plaintiff's Surgical Procedures</i>
05/01/2013	 Motion in Limine












# CASE SUMMARY

## CASE No. A-11-636515-C

	<p>Filed By: Defendant Khoury, Raymond Riad  <i>Defendant's Motion in Limine No. 7: to Admit all Evidence of Purchase of Liens and Evidence of the Amounts for Which Liens were Purchased</i></p>
05/01/2013	<p> Motion in Limine          Filed By: Defendant Khoury, Raymond Riad  <i>Defendant's Motion in Limine No. 8: to Preclude Plaintiff's Expert Terrance Dinneen from Testifying</i></p>
05/02/2013	<p> Order Setting Civil Jury Trial, Pre-Trial, and Calendar Call  <i>Third Amended Order Setting Civil Jury Trial, Pre-Trial Conference and Calendar Call</i></p>
05/02/2013	<p> Certificate of Mailing          Filed By: Defendant Khoury, Raymond Riad  <i>Certificate of Mailing</i></p>
05/20/2013	<p><b>CANCELED Calendar Call (9:00 AM) (Judicial Officer: Wiese, Jerry A)</b>  <i>Vacated - per Judge</i></p>
05/23/2013	<p> Opposition          Filed By: Defendant Khoury, Raymond Riad  <i>Defendant's Opposition to Plaintiff's Omnibus Motion in Limine</i></p>
05/24/2013	<p> Opposition to Motion in Limine          Filed By: Plaintiff Seastrand, Margaret G.  <i>Plaintiff's Opposition to Defendant's Motion in Limine No. 1: To Limit Physicians To Opinions Stated In Their Clinical Records, Depositinos, And/Or Expert Reports, If Any</i></p>
05/24/2013	<p> Opposition to Motion in Limine          Filed By: Plaintiff Seastrand, Margaret G.  <i>Plaintiff's Opposition To Defendant's Motion In Limine No. 2: To Preclude Any Treating Physician Who Did Not Provide An Expert Report From Improperly Rebutting Defense Experts</i></p>
05/24/2013	<p> Opposition to Motion in Limine          Filed By: Plaintiff Seastrand, Margaret G.  <i>Plaintiff's Opposition To Defendant's Motion In Limine No. 3: To Admit Evidence Of Medical Liens</i></p>
05/24/2013	<p> Opposition to Motion in Limine          Filed By: Plaintiff Seastrand, Margaret G.  <i>Plaintiff's Opposition To Defendant's Motion In Limine No. 4: To Limit Plaintiff's Presentation Of Damages At Trial To Amounts Actually Paid By Or On Behalf Of Plaintiff</i></p>
05/24/2013	<p> Opposition to Motion in Limine          Filed By: Plaintiff Seastrand, Margaret G.  <i>Plaintiff's Opposition To Defendant's Motion In Limine No. 7: To Admit All Evidence Of Purchase Of Liens And Evidence Of The Amounts For Which Liens Were Purchased</i></p>
05/28/2013	<p> Opposition to Motion in Limine          Filed By: Plaintiff Seastrand, Margaret G.  <i>Plaintiff's Opposition To Defendant's Motion In Limine No. 5: To Preclude Plaintiff's Experts From Commenting On, Referring To, Or Rebutting Any Defense Expert Prior To Defense Expert's Testimony</i></p>
05/28/2013	<p> Opposition to Motion in Limine</p>

# CASE SUMMARY

## CASE NO. A-11-636515-C

	<p>Filed By: Plaintiff Seastrand, Margaret G.  <i>Plaintiff's Opposition to Defendant's Motion in Limine No. 6: To Preclude Video And/Or Animated Depictions Of Plaintiff's Surgical Procedures</i></p>
05/28/2013	<p> Opposition to Motion in Limine          Filed By: Plaintiff Seastrand, Margaret G.  <i>Plaintiff's Opposition To Defendant's Motion In Limine No. 8: To Preclude Plaintiff's Expert Terrence Dimneen From Testifying</i></p>
05/28/2013	<p><b>CANCELED Jury Trial</b> (1:30 PM) (Judicial Officer: Wiese, Jerry A)  <i>Vacated - per Judge</i></p>
05/30/2013	<p> Reply          Filed by: Defendant Khoury, Raymond Riad  <i>Defendant's Reply in Support of Motion in Limine No. 1: To Limit Physicians to Opinions Stated in Their Clinical Records, Depositions, and/or Expert Reports, If Any</i></p>
05/30/2013	<p> Reply          Filed by: Defendant Khoury, Raymond Riad  <i>Defendant's Reply in Support of Motion in Limine No. 2: To Preclude Any Treating Physician Who Did Not Provide An Expert Report From Improperly Rebutting Defense Experts</i></p>
05/30/2013	<p> Reply          Filed by: Defendant Khoury, Raymond Riad  <i>Defendant's Reply in Support of Motion in Limine No. 3: To Admit Evidence of Medical Liens</i></p>
05/30/2013	<p> Reply          Filed by: Defendant Khoury, Raymond Riad  <i>Defendant's Reply in Support of Motion in Limine No. 4: To Limit Plaintiff's Presentation of Past Medical Special Damages at Trial to Amounts Actually Paid By or on Behalf of Plaintiff</i></p>
05/30/2013	<p> Reply          Filed by: Defendant Khoury, Raymond Riad  <i>Defendant's Reply in Support of Motion in Limine No. 5: To Preclude Plaintiff's Experts from Commenting On, Referring To, Or Rebutting Any Defense Expert Prior to Defense Expert's Testimony</i></p>
05/30/2013	<p> Reply          Filed by: Defendant Khoury, Raymond Riad  <i>Defendant's Reply in Support of Motion in Limine No. 6: To Preclude Video and/or Animated Depictions of Plaintiff's Surgical Procedures</i></p>
05/31/2013	<p> Pre-trial Memorandum          Filed by: Plaintiff Seastrand, Margaret G.  <i>Plaintiff's Pre-Trial Memorandum</i></p>
05/31/2013	<p> Pre-Trial Disclosure          Party: Plaintiff Seastrand, Margaret G.  <i>Plaintiff's Pre-Trial Disclosures</i></p>
05/31/2013	<p> Reply          Filed by: Defendant Khoury, Raymond Riad  <i>Defendant's Reply In Support of Motion in Limine No. 7: To Admit All Evidence of Purchase of Liens and Evidence of the Amounts for Which Liens Were Purchased</i></p>
05/31/2013	<p> Reply</p>

DEPARTMENT 30  
**CASE SUMMARY**  
**CASE NO. A-11-636515-C**

Filed by: Defendant Khoury, Raymond Riad  
*Defendant's Reply in Support of Motion in Limine No. 8: To Preclude Plaintiff's Expert Terrance Dinneen From Testifying*

06/03/2013	 <b>Pre Trial Conference</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A)
06/11/2013	<b>Omnibus Motion in Limine</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Plaintiff's Omnibus Motions in Limine</i>
06/11/2013	<b>Motion in Limine</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Defendant's Motion in Limine No. 1: To Limit Physicians to Opinions Stated in Their Clinical Records, Depositions, and/or Expert Reports, If Any</i>
06/11/2013	<b>Motion in Limine</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Defendant's Motion in Limine No. 2: To Preclude Any Treating Physician Who Did Not Provide An Expert Report from Improperly Rebutting Defense Experts</i>
06/11/2013	<b>Motion in Limine</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Defendant's Motion in Limine No. 3: To Admit Evidence of Medical Liens</i>
06/11/2013	<b>Motion in Limine</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Defendant's Motion in Limine No. 4: To Limit Plaintiff's Presentation of Past Medical Special Damages at Trial to Amounts Actually Paid by or on Behalf of Plaintiff</i>
06/11/2013	<b>Motion in Limine</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Defendant's Motion in Limine No. 5 to Preclude Plaintiff's Experts from Commenting on, Referring to, or Rebutting any Defense Expert Prior to Defense Expert's Testimony</i>
06/11/2013	<b>Motion in Limine</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Defendant's Motion in Limine No. 6: to Preclude Video and/or Animated Depictions of Plaintiff's Surgical Procedures</i>
06/11/2013	<b>Motion in Limine</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Defendant's Motion in Limine No. 7: to Admit all Evidence of Purchase of Liens and Evidence of the Amounts for Which Liens were Purchased</i>
06/11/2013	<b>Motion in Limine</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Defendant's Motion in Limine No. 8: to Preclude Plaintiff's Expert Terrance Dinneen from Testifying</i>
06/11/2013	 <b>All Pending Motions</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A)
06/21/2013	 Pre-trial Memorandum Filed by: Defendant Khoury, Raymond Riad <i>Defendant's Pre-Trial Memorandum</i>
06/24/2013	 <b>Calendar Call</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A)
06/25/2013	 Stipulation and Order Filed by: Defendant Khoury, Raymond Riad <i>Stipulation and Order Regarding Jury Questionnaire</i>
06/26/2013	 Notice of Entry of Stipulation and Order Filed By: Defendant Khoury, Raymond Riad <i>Notice of Entry of Stipulation and Order Regarding Jury Questionnaire</i>
06/28/2013	 Motion in Limine Filed By: Defendant Khoury, Raymond Riad

# CASE SUMMARY

## CASE No. A-11-636515-C

*Defendant's Motion for Leave to Amend Answer and Motion in Limine No. 9: To Preclude Plaintiff from Arguing When Defendant Khoury Admitted Liability on Order Shortening Time*

06/28/2013

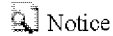


Reply

Filed by: Defendant Khoury, Raymond Riad

*Defendant's Supplemental Reply in Support of Motion in Limine No. 8: To Preclude Plaintiff's Expert Terrance Dinneen From Testifying*

07/01/2013



Notice

Filed By: Defendant Khoury, Raymond Riad

*Notice of Objection to Jury Questionnaire Questions Regarding Verdict Amounts*

07/01/2013



Receipt of Copy

Filed by: Defendant Khoury, Raymond Riad

*Receipt of Copy (Defendant's Motion for Leave to Amend Answer and Motion in Limine No. 9: to Preclude Plaintiff from Arguing when Defendant Khoury Admitted Liability on Order Shortening Time)*

07/12/2013



Order Shortening Time

Filed By: Plaintiff Seastrand, Margaret G.

*Order Shortening Time*

07/12/2013



Order Shortening Time

Filed By: Plaintiff Seastrand, Margaret G.

*Order Shortening Time*

07/12/2013



Opposition to Motion

Filed By: Plaintiff Seastrand, Margaret G.

*Plaintiff's Opposition to Defendant's Motion for Leave to Amend Answer and Motion in Limine No. 9: To Preclude Plaintiff from Arguing when Defendant Admitted Liability*

07/12/2013



Motion in Limine

Filed By: Plaintiff Seastrand, Margaret G.

*Plaintiff's Motion in Limine No. 2 Preclude Defendants From a Raising as Minor Impact or Low Impact Defense and To Exclude evidence of Property Damage on an Order Shortening Time*

07/12/2013



Motion in Limine

Filed By: Plaintiff Seastrand, Margaret G.

*Plaintiff's Motion in Limine No. 3 To Exclude Defendants' Expert Harry Smith From Testifying on an Order Shortening Time*

07/15/2013



**Jury Trial** (9:00 AM) (Judicial Officer: Wiese, Jerry A)

07/15/2013-07/19/2013, 07/22/2013-07/26/2013

07/15/2013

**Motion for Leave** (9:00 AM) (Judicial Officer: Wiese, Jerry A)

*Defendant's Motion for Leave to Amend Answer and Motion in Limine No. 9 to Preclude Plaintiff from Arguing When Defendant Khoury Admitted Liability on Order Shortening Time*

07/15/2013

**Motion in Limine** (9:00 AM) (Judicial Officer: Wiese, Jerry A)

*Plaintiff's Motion in Limine No. 2 Preclude Defendants From a Raising as Minor Impact or Low Impact Defense and To Exclude evidence of Property Damage on an Order Shortening Time*

















07/15/2013

**Motion in Limine** (9:00 AM) (Judicial Officer: Wiese, Jerry A)

*Plaintiff's Motion in Limine No. 3 To Exclude Defendants' Expert Harry Smith From Testifying on an Order Shortening Time*



DEPARTMENT 30  
**CASE SUMMARY**  
**CASE NO. A-11-636515-C**



07/15/2013	 <b>All Pending Motions</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A)
07/16/2013	 Brief Filed By: Plaintiff Seastrand, Margaret G. <i>Plaintiffs' Bench Brief Regarding the Issue of Jury Selection</i>
07/17/2013	 Jury List
07/18/2013	 Brief Filed By: Defendant Khoury, Raymond Riad <i>Defendant's Trial Brief</i>
07/18/2013	 Brief Filed By: Defendant Khoury, Raymond Riad <i>Defendant's Supplemental Trial Brief</i>
07/19/2013	 Receipt of Copy Filed by: Defendant Khoury, Raymond Riad <i>Receipt of Copy (Defendant's Supplemental Trial Brief)</i>
07/19/2013	 Deposition <i>Deposition of Sharla Lister Isle 11/5/12</i>
07/22/2013	 Receipt of Copy Filed by: Defendant Khoury, Raymond Riad <i>Receipt of Copy (Defendant's Trial Brief)</i>
07/22/2013	 Deposition <i>Deposition of Larrly Snowden 10/30/12</i>
07/22/2013	 Deposition <i>Deposition of Officer Todd Conn 7/30/12</i>
07/26/2013	 Verdict
07/26/2013	 Instructions to the Jury
07/26/2013	 Jury List <i>Amended Jury List</i>
07/26/2013	<b>Verdict</b> (Judicial Officer: Wiese, Jerry A) Debtors: Raymond Riad Khoury (Defendant) Creditors: Margaret G. Seastrand (Plaintiff) Judgment: 07/26/2013, Docketed: 08/02/2013 Total Judgment: 719,776.00
08/09/2013	 Jury List
08/09/2013	 Peremptory Challenge
08/09/2013	 Proposed Jury Instructions Not Used At Trial

DEPARTMENT 30  
**CASE SUMMARY**  
**CASE NO. A-11-636515-C**

*Propose Jury Instructions Not Used At Trial*

11/05/2013	 Judgment on Jury Verdict Filed By: Plaintiff Seastrand, Margaret G. <i>Judgment on Jury Verdict</i>
11/05/2013	<b>Judgment Upon the Verdict</b> (Judicial Officer: Wiese, Jerry A) Debtors: Raymond Riad Khoury (Defendant) Creditors: Margaret G. Seastrand (Plaintiff) Judgment: 11/05/2013, Docketed: 11/14/2013 Total Judgment: 760,497.03
11/06/2013	 Notice of Entry of Judgment Filed By: Plaintiff Seastrand, Margaret G. <i>Notice of Entry of Judgment</i>
11/06/2013	 Memorandum of Costs and Disbursements Filed By: Plaintiff Seastrand, Margaret G. <i>Plaintiff Margaret Seastrand's Memorandum of Costs and Disbursements</i>
11/06/2013	 Motion for Fees Filed By: Plaintiff Seastrand, Margaret G. <i>Plaintiff's Motion for Fees and Reasomable Attorney's Fees</i>
11/08/2013	 Notice of Hearing Filed By: Plaintiff Seastrand, Margaret G. <i>Notice of Hearing on Plaintiff's Motion for Costs and Reasonable Attorney's Fees</i>
11/25/2013	 Motion for New Trial Filed By: Defendant Khoury, Raymond Riad <i>Defendant's Motion for New Trial</i>
11/27/2013	 Receipt of Copy Filed by: Defendant Khoury, Raymond Riad <i>Receipt of Copy (Defendant's Motion for New Trial)</i>
11/27/2013	 Opposition and Countermotion Filed By: Defendant Khoury, Raymond Riad <i>Defendant Raymond Khoury's Opposition to Plaintiff Margaret Seastrand's Motion for Attorney Fees and Costs and Countermotion to Re-Tax Costs</i>
12/10/2013	<b>Motion</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Plaintiff's Motion for Fees and Reasomable Attorney's Fees</i>
12/10/2013	<b>Opposition and Countermotion</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Defendant Raymond Khoury's Opposition to Plaintiff Margaret Seastrand's Motion for Attorney Fees and Costs and Countermotion to Re-Tax Costs</i>
12/10/2013	 <b>All Pending Motions</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A)
12/23/2013	 Opposition to Motion Filed By: Plaintiff Seastrand, Margaret G. <i>Opposition to Defendant's Motion for New Trial</i>
12/24/2013	 Notice of Appeal

DEPARTMENT 30  
**CASE SUMMARY**  
**CASE No. A-11-636515-C**

	Filed By: Defendant Khoury, Raymond Riad <i>Notice of Appeal</i>	
12/24/2013	 Notice of Filing Cost Bond Filed By: Defendant Khoury, Raymond Riad <i>Notice of Filing Bond for Costs on Appeal</i>	
12/24/2013	 Certificate of Mailing Filed By: Defendant Khoury, Raymond Riad <i>Certificate of Mailing</i>	
01/09/2014	<b>Motion for New Trial</b> (9:00 AM) (Judicial Officer: Wiese, Jerry A) <i>Defendant's Motion for New Trial</i>	

DATE	FINANCIAL INFORMATION	
	<b>Defendant</b> Khoury, Raymond Riad	
	Total Charges	447.00
	Total Payments and Credits	447.00
	<b>Balance Due as of 12/27/2013</b>	<b>0.00</b>
	<b>Plaintiff</b> Seastrand, Margaret G.	
	Total Charges	270.00
	Total Payments and Credits	270.00
	<b>Balance Due as of 12/27/2013</b>	<b>0.00</b>
	<b>Defendant</b> Khoury, Raymond Riad	
	SUPERSEADES BOND Balance as of 12/27/2013	<b>918,407.95</b>

# CIVIL COVER SHEET

Clark County, Nevada

A - 11 - 636515 - C

Case No. \_\_\_\_\_

XXX

(Assigned by Clerk's Office)

## I. Party Information

Plaintiff(s) (name/address/phone): MARGARET G. SEASTRAND,

Defendant(s) (name/address/phone): RAYMOND RIAD KHOURY; DOES 1 through 10; and ROE ENTITIES 11 through 20, inclusive,

Attorney (name/address/phone):  
SHOSHANA KUNIN-LEAVIT, ESQ.  
Las Vegas, NV 89101  
Tel: (702) 444-4444

Attorney (name/address/phone):

## II. Nature of Controversy (Please check applicable bold category and applicable subcategory, if appropriate)

☐ Arbitration Requested

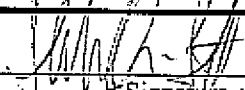
### Civil Cases

Real Property	Torts	
<input type="checkbox"/> <b>Landlord/Tenant</b> <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> <b>Title to Property</b> <input type="checkbox"/> Foreclosure <input type="checkbox"/> Liens <input type="checkbox"/> Quiet Title <input type="checkbox"/> Specific Performance <input type="checkbox"/> <b>Condemnation/Eminent Domain</b> <input type="checkbox"/> <b>Other Real Property</b> <input type="checkbox"/> Partition <input type="checkbox"/> Planning/Zoning	<input checked="" type="checkbox"/> <b>Negligence</b> <input checked="" type="checkbox"/> Negligence - Auto <input type="checkbox"/> Negligence - Medical/Dental <input type="checkbox"/> Negligence - Premises Liability (Slip/Fall) <input type="checkbox"/> Negligence - Other	<input type="checkbox"/> <b>Product Liability</b> <input type="checkbox"/> Product Liability/Motor Vehicle <input type="checkbox"/> Other Torts/Product Liability <input type="checkbox"/> <b>Intentional Misconduct</b> <input type="checkbox"/> Torts/Defamation (Libel/Slander) <input type="checkbox"/> Interfere with Contract Rights <input type="checkbox"/> <b>Employment Torts</b> (Wrongful termination) <input type="checkbox"/> <b>Other Torts</b> <input type="checkbox"/> Anti-trust <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Insurance <input type="checkbox"/> Legal Tort <input type="checkbox"/> Unfair Competition
Probate	Other Civil Filing Types	
<input type="checkbox"/> <b>Summary Administration</b> <input type="checkbox"/> <b>General Administration</b> <input type="checkbox"/> <b>Special Administration</b> <input type="checkbox"/> <b>Set Aside Estates</b> <input type="checkbox"/> <b>Trust/Conservatorships</b> <input type="checkbox"/> Individual Trustee <input type="checkbox"/> Corporate Trustee <input type="checkbox"/> <b>Other Probate</b>	<input type="checkbox"/> <b>Construction Defect</b> <input type="checkbox"/> Chapter 40 <input type="checkbox"/> General <input type="checkbox"/> <b>Breach of Contract</b> <input type="checkbox"/> Building & Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Other Contracts/Acct/Judgment <input type="checkbox"/> Collection of Actions <input type="checkbox"/> Employment Contract <input type="checkbox"/> Guarantee <input type="checkbox"/> Sale Contract <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> <b>Civil Petition for Judicial Review</b> <input type="checkbox"/> Other Administrative Law <input type="checkbox"/> Department of Motor Vehicles <input type="checkbox"/> Worker's Compensation Appeal	<input type="checkbox"/> <b>Appeal from Lower Court</b> (also check applicable civil case box) <input type="checkbox"/> Transfer from Justice Court <input type="checkbox"/> Justice Court Civil Appeal <input type="checkbox"/> <b>Civil Writ</b> <input type="checkbox"/> Other Special Proceeding <input type="checkbox"/> <b>Other Civil Filing</b> <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Conversion of Property <input type="checkbox"/> Damage to Property <input type="checkbox"/> Employment Security <input type="checkbox"/> Enforcement of Judgment <input type="checkbox"/> Foreign Judgment - Civil <input type="checkbox"/> Other Personal Property <input type="checkbox"/> Recovery of Property <input type="checkbox"/> Stockholder Suit <input type="checkbox"/> Other Civil Matters

## III. Business Court Requested (Please check applicable category; for Clark or Washoe Counties only.)

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> NRS Chapters 78-88   | <input type="checkbox"/> Investments (NRS 104 ARL 8)         | <input type="checkbox"/> Enhanced Case Mgmt/Business  |
| <input type="checkbox"/> Commodities (NRS 90) | <input type="checkbox"/> Deceptive Trade Practices (NRS 598) | <input type="checkbox"/> Other Business Court Matters |
| <input type="checkbox"/> Securities (NRS 90)  | <input type="checkbox"/> Trademarks (NRS 600A)               |   |

3/8/11  
Date

  
Signature of initiating party or representative

  
CLERK OF THE COURT

JGJV  
BENJAMIN P. CLOWARD, ESQ.  
Nevada Bar No. 11087  
ALISON M. BRASIER, ESQ.  
Nevada Bar No. 10522  
RICHARD HARRIS LAW FIRM  
801 South Fourth Street  
Las Vegas, Nevada 89101  
Phone (702) 444-4444  
Fax (702) 444-4455  
E-Mail: Benjamin@RichardHarrisLaw.com  
*Attorneys for Plaintiff*

DISTRICT COURT  
CLARK COUNTY, NEVADA

MARGARET SEASTRAND,  
  
Plaintiff,

CASE NO: A-11-636515-C  
DEPT NO: XXX

vs.

RAYMOND RIAD KHOURY; DOES 1  
through 10; and ROE ENTITIES 11 through  
20 inclusive;

Defendants.

JUDGMENT UPON THE JURY VERDICT

This action came on for trial before the court and the jury, the Honorable, District Judge,  
presiding, and the issues having been duly tried and the jury having duly rendered its verdict.<sup>1</sup>

IT IS ORDERED AND ADJUDGED that Plaintiff, MARGARET SEASTRAND, have  
and recover of Defendant, RAYMOND RIAD KHOURY, the following sum:

Past Medical Expenses:	\$ 236,794.00
Future Medical Expenses:	\$113,725.00
Past Loss of Household Services:	\$ 32,996.00

<sup>1</sup> Exhibit 1: Jury Verdict

<input type="checkbox"/> Voluntary Dis.	<input type="checkbox"/> Slip Dis.	<input type="checkbox"/> Gen. Jdgmt.
<input type="checkbox"/> Voluntary (stat) Dis.	<input type="checkbox"/> Slip Jdgmt.	<input type="checkbox"/> Non-Jury Trial
<input type="checkbox"/> Jdgmt on Arb Award	<input type="checkbox"/> Default Jdgmt	<input checked="" type="checkbox"/> Jury Trial
<input type="checkbox"/> Arbitration Dis (by deft)	<input type="checkbox"/> Transferred	

Future Loss of Household Services:	\$183,238.00
Past Physical and Mental Pain, Suffering, Anguish and Disability	\$ 85,013.00
Future Physical and Mental Pain, Suffering, Anguish and Disability	<u>\$ 68,010.00</u>
<b>Total Damages</b>	<b>\$719,776.00</b>

IT IS FURTHER ORDERED AND ADJUDGED that Plaintiff's past damages shall bear Pre-Judgment interest in accordance with Lee v. Ball, 116 P.3d 64, (2005) at the rate of 3.25% per annum plus 2%<sup>2</sup> from the date of service of the Summons and Complaint<sup>3</sup>, on June 1, 2011, through July 26, 2013, as follows:

**PRE-JUDGMENT INTEREST ON PAST MEDICAL DAMAGES:**

06/01/2011 through 07/26/13 = \$27,177.04  
 [(787 days) at (prime rate (3.25%) plus 2 percent = 5.25%)]  
 [Interest is approximately \$4.13 per day]

**PRE-JUDGMENT INTEREST ON PAST LOSS OF HOUSEHOLD SERVICES:**

06/01/2011 through 07/26/13 = \$3,786.98  
 [(787 days) at (prime rate (3.25%) plus 2 percent = 5.25%)]  
 [Interest is approximately \$4.13 per day]

**PRE-JUDGMENT INTEREST ON PAST PHYSICAL AND MENTAL PAIN, SUFFERING, ANGUISH AND DISABILITY:**

06/01/2011 through 07/26/2013 = \$9,757.01  
 [(787 days) at (prime rate (3.25%) plus 2 percent = 5.25%)]  
 [Interest is approximately \$4.13 per day]

<sup>2</sup> Exhibit 2: Prime Rate as of January 1, 2013

<sup>3</sup> Exhibit 3: Affidavit of Service

NOW, THEREFORE, Judgment Upon the Verdict in favor of the Plaintiff is as follows:

MARGARET SEASTRAND is hereby given Seven Hundred Sixty Thousand Four Hundred Ninety Seven and 03/100 dollars (\$760,497.03), which shall bear post-interest at the current rate of 5.25% per day, until satisfied.

DATED THIS 1<sup>st</sup> day of November, 2013.

  
DISTRICT COURT JUDGE *kg*

*Respectfully submitted:*

  
RICHARD HARRIS LAW FIRM

BENJAMIN P. CLOWARD, ESQ.

Nevada Bar No. 11087

ALISON M. BRASIER, ESQ.

Nevada Bar No. 10522

801 South Fourth Street

Las Vegas, NV 89101

*Attorneys for Plaintiff*

# EXHIBIT “1”



DISTRICT COURT

CLARK COUNTY, NEVADA FILED IN OPEN COURT  
STEVEN D. GRIERSON  
CLERK OF THE COURT

JUL 26 2013

MARGARET G. SEASTRAND,

Plaintiff.

CASE NO. A-11-636515-C  
DEPT NO. XXX

ALICE POLCI, DEPUTY

vs.

RAYMOND RIAD KHOURY; DOES I  
through 10; and ROE ENTITIES 11 through  
20. inclusive,

VERDICT

Defendant

We, the jury in the above-entitled action, find for the Plaintiff, Margaret  
Seastrand, and against the Defendant, Raymond Khoury, and find that the Plaintiff  
is awarded the following amounts:

Past Medical Expenses: \$ 236,794

Future Medical Expenses: \$ 113,725

Past Loss of Household Services: \$ 32,996

Future Loss of Household Services: \$ 183,238

Past Physical and Mental Pain,

Suffering, Aguish and Disability: \$ 85,013

Future Physical and Mental Pain,

Suffering, Anguish and Disability: \$ 68,010

DATED this 26 day of July, 2013.

FOREMAN

# EXHIBIT “2”

# PRIME INTEREST RATE

**NRS 99.040(1) requires:**

*"When there is no express contract in writing fixing a different rate of interest, interest must be allowed at a rate equal to the prime rate at the largest bank in Nevada, as ascertained by the Commissioner of Financial Institutions, on January 1, or July 1, as the case may be, immediately preceding the date of the transaction, plus 2 percent, upon all money from the time it becomes due, . . ."*

Following is the prime rate as ascertained by the Commissioner of Financial Institutions:

January 1, 2013	3.25%	July 1, 2012	3.25%
January 1, 2012	3.25%	July 1, 2011	3.25%
January 1, 2011	3.25%	July 1, 2010	3.25%
January 1, 2010	3.25%	July 1, 2009	3.25%
January 1, 2009	3.25%	July 1, 2008	5.00%
January 1, 2008	7.25%	July 1, 2007	8.25%
January 1, 2007	8.25%	July 1, 2006	8.25%
January 1, 2006	7.25%	July 1, 2005	6.25%
January 1, 2005	5.25%	July 1, 2004	4.25%
January 1, 2004	4.00%	July 1, 2003	4.00%
January 1, 2003	4.25%	July 1, 2002	4.75%
January 1, 2002	4.75%	July 1, 2001	6.75%
January 1, 2001	9.50%	July 1, 2000	9.50%
January 1, 2000	8.25%	July 1, 1999	7.75%
January 1, 1999	7.75%	July 1, 1998	8.50%
January 1, 1998	8.50%	July 1, 1997	8.50%
January 1, 1997	8.25%	July 1, 1996	8.25%
January 1, 1996	8.50%	July 1, 1995	9.00%
January 1, 1995	8.50%	July 1, 1994	7.25%
January 1, 1994	6.00%	July 1, 1993	6.00%
January 1, 1993	6.00%	July 1, 1992	6.50%
January 1, 1992	6.50%	July 1, 1991	8.50%
January 1, 1991	10.00%	July 1, 1990	10.00%
January 1, 1990	10.50%	July 1, 1989	11.00%
January 1, 1989	10.50%	July 1, 1988	9.00%
January 1, 1988	8.75%	July 1, 1987	8.25%
January 1, 1987	Not Available		

**\* Attorney General Opinion No. 98-20:**

*If clearly authorized by the creditor, a collection agency may collect whatever interest on a debt its creditor would be authorized to impose. A collection agency may not impose interest on any account or debt where the creditor has agreed not to impose interest or has otherwise indicated an intent not to collect interest. Simple interest may be imposed at the rate established in NRS 99.040 from the date the debt becomes due on any debt where there is no written contract fixing a different rate of interest, unless the account is an open or store accounts as discussed herein. In the case of open or store accounts, interest may be imposed or awarded only by a court of competent jurisdiction in an action over the debt.*

# EXHIBIT “3”

Legal Process Service, 626 S. 8th Street, Las Vegas, NV 89101 (702) 471-7255

1    AFFT                    DIST            COURT                    CLARK COUNTY            STATE OF NEVADA  
2    CASE NO.: A-11-636615-C                    DEPT. XXX

3    Richard Harris Law Firm  
4    Shoshana Kunin-Leavitt, Esq.  
5    801 S. 4th St.  
6    Las Vegas, NV 89101  
7    State Bar No.: 11625

8    Attorney(s) for: Plaintiff(s)

9                                    **Margaret G. Seastrand,**

Date:  
Time:

10                                    vs

Plaintiff(s)

11                                    **Raymond Rlad Khoury; et al.**

**AFFIDAVIT OF SERVICE**

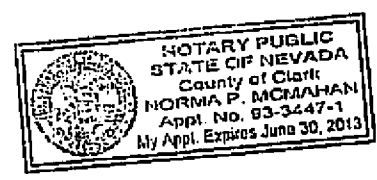
Defendant(s)

12    Vicky Peltier, being duly sworn deposes and says: That at all times herein affiant was and is a citizen of the United  
13    States, over 18 years of age, licensed to serve civil process in the State of Nevada under license #604, and not a  
14    party to or interested in the proceeding in which this affidavit is made. The affiant received 1 copy(ies) of the:

**Summons & Complaint**

15    on the 1st day of June, 2011 and served the same on the 1st day of June, 2011 at 7:51PM by:

- 16    1. delivering and leaving a copy with the Defendant(s),     at    .  
17    2. serving the Defendant(s), Raymond Rlad Khoury by personally delivering and leaving a copy with  
18    Lesley Khoury, Wife, a person of suitable age and discretion residing at the Defendant(s)'s usual place of abode  
19    located at 9190 W. Ann Rd., Las Vegas, NV 89149.  
20    3. serving the Defendant(s),     by personally delivering and leaving a copy at :    .  
21        a. with     as     an agent lawfully designated by statute to accept service of process;  
22        b. with     pursuant to NRS 14.020 as a person of suitable age and and discretion at the above address, which  
23        address is the address of the registered agent as shown on the current certificate of designation filed with the  
24        Secretary of State.



33    State of Nevada, County of Clark

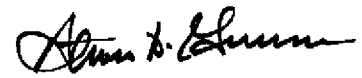
34    SUBSCRIBED AND SWORN to before me on this

35    2nd day of June, 2011

36    [Signature]  
Notary Public

Vicky Peltier  
Affiant - Vicky Peltier                    #R-058000  
Legal Process Service                    License # 604

WorkOrderNo 1104672

  
CLERK OF THE COURT

NJUD  
BENJAMIN P. CLOWARD, ESQ.  
Nevada Bar No. 11087  
Utah Bar No. 12336  
**RICHARD HARRIS LAW FIRM**  
801 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorney for Plaintiff*

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

MARGARET SEASTRAND,  
  
Plaintiff,

CASE NO: A-11-636515-C  
DEPT NO: XXX

vs.

RAYMOND RIAD KHOURY; DOES 1  
through 10; and ROE ENTITIES 11 tough  
20 inclusive,


Defendants.

**NOTICE OF ENTRY OF JUDGMENT**

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that a Judgment Upon  
the Jury Verdict was entered in the above entitled matter on the 5<sup>th</sup> day of November, 2013, a  
copy of which is attached hereto as Exhibit "1."

DATED this 6<sup>th</sup> day of November, 2013.

**RICHARD HARRIS LAW FIRM**

  
BENJAMIN P. CLOWARD, ESQ.  
Nevada Bar No. 11087  
ALISON M. BRASIER, ESQ.  
Nevada Bar No. 10522  
801 S. Fourth Street  
Las Vegas, Nevada 89101

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that I am an employee of RICHARD HARRIS  
LAW FIRM and that on the 10 day of November 2013, I caused the foregoing **NOTICE**  
**OF ENTRY OF JUDGMENT** to be served as follows:

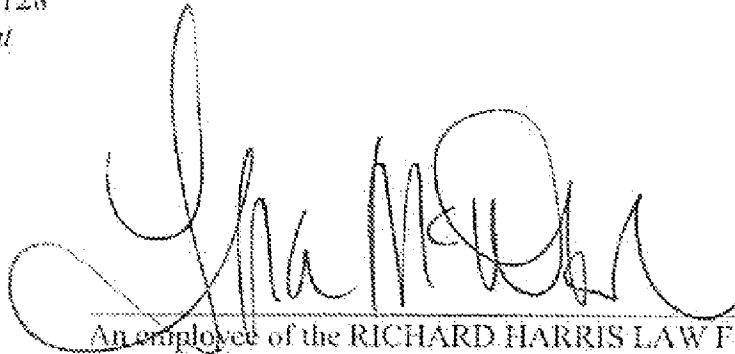
☒ [X] by placing a true and correct copy of the same to be deposited for mailing in the  
U.S. Mail at Las Vegas, Nevada, enclosed in a sealed envelope upon which first  
class postage was fully prepaid; and/or

☒ pursuant to EDCR 7.26, by sending it via facsimile; and/or

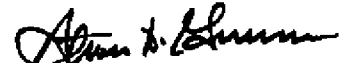
☐ [ ] by hand delivery

to the attorneys listed below:

STEVEN T. JAFFE, ESQ.  
HALL, JAFFE & CLAYTON, LLP  
7425 Peak Drive  
Las Vegas, Nevada 89128  
*Attorneys for Defendant*



An employee of the RICHARD HARRIS LAW FIRM



CLERK OF THE COURT

JGJV  
BENJAMIN P. CLOWARD, ESQ.  
Nevada Bar No. 11087  
ALISON M. BRASIER, ESQ.  
Nevada Bar No. 10522  
RICHARD HARRIS LAW FIRM  
801 South Fourth Street  
Las Vegas, Nevada 89101  
Phone (702) 444-4444  
Fax (702) 444-4455  
E-Mail: Benjamin@RichardHarrisLaw.com  
*Attorneys for Plaintiff*

DISTRICT COURT

CLARK COUNTY, NEVADA

MARGARET SEASTRAND,

Plaintiff,

vs.

RAYMOND RIAD KHOURY; DOES 1  
through 10; and ROE ENTITIES 11 through  
20 inclusive,

Defendants.

CASE NO: A-11-636515-C  
DEPT NO: XXX

JUDGMENT UPON THE JURY VERDICT

This action came on for trial before the court and the jury, the Honorable, District Judge,  
presiding, and the issues having been duly tried and the jury having duly rendered its verdict.<sup>1</sup>

IT IS ORDERED AND ADJUDGED that Plaintiff, MARGARET SEASTRAND, have  
and recover of Defendant, RAYMOND RIAD KHOURY, the following sum:

Past Medical Expenses:	\$ 236,794.00
Future Medical Expenses:	\$113,725.00
Past Loss of Household Services:	\$ 32,996.00

<sup>1</sup> Exhibit 1: Jury Verdict

<input type="checkbox"/> Voluntary Dis	<input type="checkbox"/> Slip Dis	<input type="checkbox"/> Sum Jdgmt
<input type="checkbox"/> Voluntary (stat) Dis	<input type="checkbox"/> Slip Jdgmt	<input type="checkbox"/> Non-Jury Trial
<input type="checkbox"/> Jdgmt on Arb Award	<input type="checkbox"/> Default Jdgmt	<input checked="" type="checkbox"/> Jury Trial
<input type="checkbox"/> Res to Dis (by cell)	<input type="checkbox"/> Transferred	



Future Loss of Household Services:	\$183,238.00
Past Physical and Mental Pain, Suffering, Anguish and Disability	\$ 85,013.00
Future Physical and Mental Pain, Suffering, Anguish and Disability	<u>\$ 68,010.00</u>
<b>Total Damages</b>	<b>\$719,776.00</b>

IT IS FURTHER ORDERED AND ADJUDGED that Plaintiff's past damages shall bear Pre-Judgment interest in accordance with Lee v. Ball, 116 P.3d 64, (2005) at the rate of 3.25% per annum plus 2%<sup>2</sup> from the date of service of the Summons and Complaint<sup>3</sup>, on June 1, 2011, through July 26, 2013, as follows:

**PRE-JUDGMENT INTEREST ON PAST MEDICAL DAMAGES:**

06/01/2011 through 07/26/13 = \$27,177.04  
[(787 days) at (prime rate (3.25%) plus 2 percent = 5.25%)]  
[Interest is approximately \$4.13 per day]

**PRE-JUDGMENT INTEREST ON PAST LOSS OF HOUSEHOLD SERVICES:**

06/01/2011 through 07/26/13 = \$3,786.98  
[(787 days) at (prime rate (3.25%) plus 2 percent = 5.25%)]  
[Interest is approximately \$4.13 per day]

**PRE-JUDGMENT INTEREST ON PAST PHYSICAL AND MENTAL PAIN, SUFFERING, ANGUISH AND DISABILITY:**

06/01/2011 through 07/26/2013 = \$9,757.01  
[(787 days) at (prime rate (3.25%) plus 2 percent = 5.25%)]  
[Interest is approximately \$4.13 per day]

<sup>2</sup> Exhibit 2: Prime Rate as of January 1, 2013

<sup>3</sup> Exhibit 3: Affidavit of Service

NOW, THEREFORE, Judgment Upon the Verdict in favor of the Plaintiff is as follows:

MARGARET SEASTRAND is hereby given Seven Hundred Sixty Thousand Four Hundred Ninety Seven and 03/100 dollars (\$760,497.03), which shall bear post-interest at the current rate of 5.25% per day, until satisfied.

DATED THIS 1<sup>st</sup> day of November, 2013.

  
DISTRICT COURT JUDGE 

*Respectfully submitted:*

  
RICHARD HARRIS LAW FIRM

BENJAMIN P. CLOWARD, ESQ.

Nevada Bar No. 11087

ALISON M. BRASIER, ESQ.

Nevada Bar No. 10522

801 South Fourth Street

Las Vegas, NV 89101

*Attorneys for Plaintiff*

EXHIBIT "1"

DISTRICT COURT  
CLARK COUNTY, NEVADA FILED IN OPEN COURT  
STEVEN D. GRIERSON  
CLERK OF THE COURT

JUL 26 2013

MARGARET G. SEASTRAND,

Plaintiff,

CASE NO. A-11-636515-C

DEPT NO. XXX

ALICE POLCH, DEPUTY

vs.

RAYMOND RIAD KHOURY; DOES I  
through 10; and ROE ENTITIES II through  
20, inclusive,

VERDICT

Defendant

We, the jury in the above-entitled action, find for the Plaintiff, Margaret  
Seastrand, and against the Defendant, Raymond Khoury, and find that the Plaintiff  
is awarded the following amounts:

Past Medical Expenses: \$ 236,794

Future Medical Expenses: \$ 113,725

Past Loss of Household Services: \$ 32,996

Future Loss of Household Services: \$ 183,238

Past Physical and Mental Pain,

Suffering, Aguish and Disability: \$ 85,013

Future Physical and Mental Pain,

Suffering, Anguish and Disability: \$ 68,010

DATED this 26 day of July, 2013.

FOREMAN

# EXHIBIT “2”

# PRIME INTEREST RATE

NRS 99.040(1) requires:

*"When there is no express contract in writing fixing a different rate of interest, interest must be allowed at a rate equal to the prime rate at the largest bank in Nevada, as ascertained by the Commissioner of Financial Institutions, on January 1, or July 1, as the case may be, immediately preceding the date of the transaction, plus 2 percent, upon all money from the time it becomes due, . . ."*

Following is the prime rate as ascertained by the Commissioner of Financial Institutions:

January 1, 2013	3.25%	July 1, 2012	3.25%
January 1, 2012	3.25%	July 1, 2011	3.25%
January 1, 2011	3.25%	July 1, 2010	3.25%
January 1, 2010	3.25%	July 1, 2009	3.25%
January 1, 2009	3.25%	July 1, 2008	5.00%
January 1, 2008	7.25%	July 1, 2007	8.25%
January 1, 2007	8.25%	July 1, 2006	8.25%
January 1, 2006	7.25%	July 1, 2005	6.25%
January 1, 2005	5.25%	July 1, 2004	4.25%
January 1, 2004	4.00%	July 1, 2003	4.00%
January 1, 2003	4.25%	July 1, 2002	4.75%
January 1, 2002	4.75%	July 1, 2001	6.75%
January 1, 2001	9.50%	July 1, 2000	9.50%
January 1, 2000	8.25%	July 1, 1999	7.75%
January 1, 1999	7.75%	July 1, 1998	8.50%
January 1, 1998	8.50%	July 1, 1997	8.50%
January 1, 1997	8.25%	July 1, 1996	8.25%
January 1, 1996	8.50%	July 1, 1995	9.00%
January 1, 1995	8.50%	July 1, 1994	7.25%
January 1, 1994	6.00%	July 1, 1993	6.00%
January 1, 1993	6.00%	July 1, 1992	6.50%
January 1, 1992	6.50%	July 1, 1991	8.50%
January 1, 1991	10.00%	July 1, 1990	10.00%
January 1, 1990	10.50%	July 1, 1989	11.00%
January 1, 1989	10.50%	July 1, 1988	9.00%
January 1, 1988	8.75%	July 1, 1987	8.25%
January 1, 1987	Not Available		

\* Attorney General Opinion No. 98-20:

*If clearly authorized by the creditor, a collection agency may collect whatever interest on a debt its creditor would be authorized to impose. A collection agency may not impose interest on any account or debt where the creditor has agreed not to impose interest or has otherwise indicated an intent not to collect interest. Simple interest may be imposed at the rate established in NRS 99.040 from the date the debt becomes due on any debt where there is no written contract fixing a different rate of interest, unless the account is an open or store accounts as discussed herein. In the case of open or store accounts, interest may be imposed or awarded only by a court of competent jurisdiction in an action over the debt.*

EXHIBIT “3”

Legal Process Service, 626 S. 8th Street, Las Vegas, NV 89101 (702) 471-7255

1 AFFT DIST COURT CLARK COUNTY STATE OF NEVADA  
2 CASE NO.: A-11-636515-C DEPT. XXX  
3 Richard Harris Law Firm  
4 Shoshana Kunin-Leavitt, Esq.  
5 801 S. 4th St.  
6 Las Vegas, NV 89101  
7 State Bar No.: 11625  
8 Attorney(s) for: Plaintiff(s)

9 Margaret G. Seastrand,

Date:  
Time:

10 vs

Plaintiff(s)

11 Raymond Riad Khoury; et al.

AFFIDAVIT OF SERVICE

Defendant(s)

12 Vicky Peltier, being duly sworn deposes and says: That at all times herein affiant was and is a citizen of the United  
13 States, over 18 years of age, licensed to serve civil process in the State of Nevada under license #604, and not a  
14 party to or interested in the proceeding in which this affidavit is made. The affiant received 1 copy(ies) of the:

15 **Summons & Complaint**

16 on the 1st day of June, 2011 and served the same on the 1st day of June, 2011 at 7:51PM by:

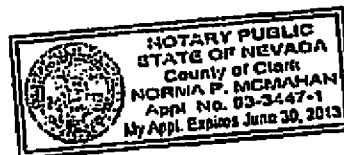
17 1. delivering and leaving a copy with the Defendant(s), at \_\_\_\_\_.

18 2. serving the Defendant(s), Raymond Riad Khoury by personally delivering and leaving a copy with  
19 Lesley Khoury, Wife, a person of suitable age and discretion residing at the Defendant(s)'s usual place of abode  
20 located at 9190 W. Ann Rd., Las Vegas, NV 89149.

21 3. serving the Defendant(s), \_\_\_\_\_ by personally delivering and leaving a copy at : \_\_\_\_\_.

22 a. with \_\_\_\_\_ as \_\_\_\_\_ an agent lawfully designated by statute to accept service of process;

23 b. with \_\_\_\_\_ pursuant to NRS 14.020 as a person of suitable age and discretion at the above address, which  
24 address is the address of the registered agent as shown on the current certificate of designation filed with the  
25 Secretary of State.



26 State of Nevada, County of Clark

27 SUBSCRIBED AND SWORN to before me on this

28 2nd day of June, 2011

29 Notary Public

30 Vicky J. Peltier  
Affiant - Vicky Peltier

#R-058000

Legal Process Service

License # 604

WorkOrderNo 1104672



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**December 05, 2012**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

<b>December 05, 2012</b>	<b>9:00 AM</b>	<b>Motion to Compel</b>	<b>Defendant's Motion to Compel Discovery Responses and Production of Documents re: Plaintiff's Medical Liens</b>
--------------------------	----------------	-------------------------	---

**HEARD BY:** Bulla, Bonnie

**COURTROOM:** RJC Level 5 Hearing  
Room

**COURT CLERK:** Alan Castle

**RECORDER:** Richard Kangas

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Brasier, Allison M.	Attorney
	Smith, Jacob S.	Attorney

**JOURNAL ENTRIES**

- COMMISSIONER RECOMMENDED, Defendant's Motion to Compel Discovery Responses GRANTED In Part; Court Finds pursuant to Tri-County dicta, and, Defendant is entitled to know liens. FURTHER, Plaintiff to supplement lien amount(s) in Plaintiff's possession. As to requiring Plaintiff to track down specific lien(s), COMMISSIONER RECOMMENDED, DENIED; FURTHER, fess DENIED. Mr. Smith will prepare Report and Recommendation and submit to Discovery Commissioner within ten (10) days of this hearing, otherwise, SANCTIONS MAY ISSUE; Ms. Brasier to approve as to form and content. Matter set for status check on calendar for compliance.

1/04/13 11:00 a.m. Status Check: Compliance/Report and Recommendations

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**January 04, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**January 04, 2013      11:00 AM      Status Check:  
Compliance/Sanctions**

**HEARD BY:**    Bulla, Bonnie

**COURTROOM:**    RJC Level 5 Hearing  
Room

**COURT CLERK:**    Jennifer Lott

**RECORDER:**    Richard Kangas

**REPORTER:**

**PARTIES**

**PRESENT:**      Brasier, Allison M.      Attorney  
                         Smith, Jacob S.      Attorney

**JOURNAL ENTRIES**

- No timely Report and Recommendation from 12/5/12; report was sent back a second time; document was changed, but Attorney did not re-sign report. Colloquy. COMMISSIONER RECOMMENDED, Mr. Smith to pay \$100 contribution to Legal Aid Center of Southern Nevada, and submit a Report and Recommendation within 10 days, or PROGRESSIVE sanctions will issue; status check SET. Commissioner will prepare the recommendation.

2/1/13 11:00 a.m. Status Check: Compliance

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**April 29, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**April 29, 2013      9:00 AM      Pre Trial Conference**

**HEARD BY:**    Wiese, Jerry A      **COURTROOM:**    RJC Courtroom 14C

**COURT CLERK:**    Alice Jacobson

**RECORDER:**

**REPORTER:**    Michelle R. Ferreyra-Marez

**PARTIES**

**PRESENT:**      Smith, Jacob S.      Attorney

**JOURNAL ENTRIES**

- Counsel submitted a Stipulation and Order to Continue Trial. COURT ORDERED, trial dates  
RESET. Order signed in Open Court.

6/3/13 9:00 AM PC  
6/24/13 9:00 AM CC  
7/1/13 1:00 PM JT

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**June 03, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**June 03, 2013**

**9:00 AM**

**Pre Trial Conference**

**HEARD BY:**    Wiese, Jerry A

**COURTROOM:**    RJC Courtroom 14A

**COURT CLERK:**    Alice Jacobson

**RECORDER:**

**REPORTER:**

**PARTIES**

**PRESENT:**

**JOURNAL ENTRIES**

- There being no parties present. COURT ORDERED, matter OFF CALENDAR.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**June 11, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**June 11, 2013      9:00 AM      All Pending Motions**

**HEARD BY:**    Wiese, Jerry A      **COURTROOM:**    RJC Courtroom 14A

**COURT CLERK:**    Alice Jacobson

**RECORDER:**

**REPORTER:**    Kristy Clark

**PARTIES**

<b>PRESENT:</b>	Brasier, Allison M.	Attorney
	Cloward, Benjamin P.	Attorney
	Jaffe, Steven T.	Attorney
	Smith, Jacob S.	Attorney

**JOURNAL ENTRIES**

- Plaintiff's Omnibus Motions in Limine... Defendant's Motion in Limine No. 1: To Limit Physicians to Opinions Stated in Their Clinical Records, Depositions, and/or Expert Reports, If Any... Defendant's Motion in Limine No. 2: To Preclude Any Treating Physician Who Did Not Provide An Expert Report from Improperly Rebutting Defense Experts.... Defendant's Motion in Limine No. 3: To Admit Evidence of Medical Liens... Defendant's Motion in Limine No. 4: To Limit Plaintiff's Presentation of Past Medical Special Damages at Trial to Amounts Actually Paid by or on Behalf of Plaintiff.... Defendant's Motion in Limine No. 5 to Preclude Plaintiff's Experts from Commenting on, Referring to, or Rebutting any Defense Expert Prior to Defense Expert's Testimony ....Defendant's Motion in Limine No. 6: to Preclude Video and/or Animated Depictions of Plaintiff's Surgical Procedures ... Defendant's Motion in Limine No. 7: to Admit all Evidence of Purchase of Liens and Evidence of the Amounts for Which Liens were Purchased... Defendant's Motion in Limine No. 8: to Preclude Plaintiff's Expert Terrance Dinneen from Testifying

As to Plaintiff's Omnibus Motions in Limine: Arguments by counsel. COURT ORDERED as to:

1. Defendant Raymond Khoury s Opposition to Plaintiffs Motion to Preclude Hypothetical Medical

PRINT DATE:    12/27/2013

Page 5 of 23

Minutes Date:

December 05, 2012

Questions Designed to Confuse Jury, ALLOWED but not to confuse the jury.

2. Defendant Raymond Khoury s Opposition to Plaintiffs Motion to Preclude any Suggestion to Jury that There Might Be Related Medical Records Prior to the Subject Accident When No Such Records Exist, CAN'T talk about records that no one knows about or doesn't exist.
3. Defendant Raymond Khoury s Opposition to Plaintiffs Motion to Preclude Reference to Attorney-Driven Litigation or Medical Build-Up Litigation, GRANTED, no talk about attorney driven case.
4. Defendant Raymond Khoury s Opposition to Plaintiffs Motion to Preclude Reference to Plaintiff s Retention of Counsel, GRANTED.
5. Defendant Raymond Khoury s Opposition to Plaintiffs Motion to Preclude Reference as to Plaintiffs Counsel Working with Plaintiffs Treating Physicians on Other, Unrelated Cases, DENIED.
6. Defendant Raymond Khoury s Opposition to Plaintiff s Motion to Limit Closing Arguments to Evidence Presented at Trial, GRANTED as to both parties.
7. Limited Opposition to Plaintiff s Motion to Preclude the Suggestion of Abuse of Narcotic Pain Medication When There is None, GRANTED.
8. Defendant Raymond Khoury s Opposition to Plaintiff s Motion to Allow Voir Dire Questioning Regarding Tort-Reform Exposure, GRANTED.
9. Defendant Raymond Khoury s Opposition to Plaintiff s Motion to Allow Voir Dire Questioning Regarding Verdict Amounts, GRANTED.
10. Permitting Treating Physicians to Testify as to Causation, Diagnosis, Prognosis, Future Treatment, and Extent of Disability Without a Formal Expert Report, GRANTED.
11. Precluding Negative Inference for Failing to Call Cumulative Witness, GRANTED.
12. Precluding References to Collateral Sources, GRANTED.
13. Precluding Defendant from Referencing Injuries/ Non-Injuries from Any Individuals Involved in Crash Other than Margie, DENIED.
14. Excluding Evidence of PRIOR Unrelated, Injuries, Conditions or Medical Treatment, GRANTED.
15. Precluding Reference to Prior Incidents, RULING RESERVED FOR TRIAL.
16. Precluding the Responding Police Officer from Providing Biomechanical Opinions, GRANTED.
17. Preclusion of Margie s P. nor Civil Lawsuit, GRANTED will allow questions of witness as to previous attorney but will not allow specifics.
18. Precluding Defendant s Medical Experts from Referring to the Crash as Minor or Making Reference to the Property Damage Sustained by the Vehicles, DENIED.
19. Precluding. Schifini from Offering Testimony Regarding Alleged Secondary Gain by Margie, RESERVED FOR TRIAL.
20. Precluding Dr. Schifini and Dr. Siegler from Offering Testimony Regarding Margie s Spine Surgeries, GRANTED.

As to Defendant's Motion in Limine No. 1: To Limit Physicians to Opinions Stated in Their Clinical Records, Depositions, and/or Expert Reports, If Any. Arguments by counsel. COURT ORDERED, motion GRANTED; inferences will be outside the presence of the jury.

As to Defendant's Motion in Limine No. 2: To Preclude Any Treating Physician Who Did Not Provide An Expert Report from Improperly Rebutting Defense Experts. Arguments by counsel. COURT

ORDERED, motion DENIED.

As to Defendant's Motion in Limine No. 3: To Admit Evidence of Medical Lien. Arguments by counsel. COURT ORDERED, motion DENIED.

As to Defendant's Motion in Limine No. 4: To Limit Plaintiff's Presentation of Past Medical Special Damages at Trial to Amounts Actually Paid by or on Behalf of Plaintiff. Arguments by counsel. COURT ORDERD, motion DENIED.

As to Defendant's Motion in Limine No. 5 to Preclude Plaintiff's Experts from Commenting on, Referring to, or Rebutting any Defense Expert Prior to Defense Expert's Testimony. Arguments by counsel. COURT ORDERD, motion DENIED.

As to Defendant's Motion in Limine No. 6: to Preclude Video and/or Animated Depictions of Plaintiff's Surgical Procedures. Arguments by counsel. COURT ORDERD, motion DENIED; Court to review tape.

As to Defendant's Motion in Limine No. 7: to Admit all Evidence of Purchase of Liens and Evidence of the Amounts for Which Liens were Purchased. Arguments by counsel. COURT ORDERD, motion DENIED.

As to Defendant's Motion in Limine No. 8: to Preclude Plaintiff's Expert Terrance Dinneen from Testifying. Arguments by counsel. COURT ORDERD, motion DENIED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**June 24, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**June 24, 2013      9:00 AM      Calendar Call**

**HEARD BY:**    Wiese, Jerry A

**COURTROOM:**    RJC Courtroom 14A

**COURT CLERK:**    Alice Jacobson

**RECORDER:**

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Brasier, Allison M.	Attorney
	Cloward, Benjamin P.	Attorney
	Smith, Jacob S.	Attorney

**JOURNAL ENTRIES**

- Counsel announced ready to go and estimated 9 days. Colloquy regarding Jury Questionnaires and Jury Instructions. COURT INSTRUCEd counsel to submit Jury Instructions on the start of trial in a Word format on a disc or flash drive. COURT ORDERED, matter SET for trial.

7/15/13 9:00 AM JURY TRIAL



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**July 15, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**July 15, 2013      9:00 AM      Jury Trial**

**HEARD BY:**    Wiese, Jerry A

**COURTROOM:**

**COURT CLERK:**    Alice Jacobson

**RECORDER:**

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Brasier, Allison M.	Attorney
	Cloward, Benjamin P.	Attorney
	Jaffe, Steven T.	Attorney
	Smith, Jacob S.	Attorney

**JOURNAL ENTRIES**

- OUTSIDE THE PRESENCE OF THE PROSPECTIVE JURY. Juror excusal stipulated on the record by counsel. Jurors to be excused stated on the record.

PROSPECTIVE JURY PRESENT. Jury sworn. Role Call. General Voir Dire conducted.

OUTSIDE THE PRESENCE OF THE PROSPECTIVE JURY. Jurors to be excused stated on the record. Statement regarding insurance by Mr. Jaffe.

PROSPECTIVE JURY PRESENT. Jury sworn. Role Call. General Voir Dire conducted.

OUTSIDE THE PRESENCE OF THE PROSPECTIVE JURY. Objections put on the record. Challenge for cause put on the record.

PROSPECTIVE JURY PRESENT. General Voir Dire conducted.

COURT ADMONISHED and EXCUSED the prospective jury panel for the evening.

PRINT DATE:    12/27/2013

Page 9 of 23

Minutes Date:

December 05, 2012

OUTSIDE THE PRESENCE OF THE PROSPECTIVE JURY. Mr. Robert Eglet allowed to participate in oral argument. Objections put on the record. Challenge for cause put on the record.

COURT ORDERED, trial CONTINUED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**July 15, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**July 15, 2013      9:00 AM      All Pending Motions**

**HEARD BY:**    Wiese, Jerry A      **COURTROOM:**

**COURT CLERK:**    Alice Jacobson

**RECORDER:**

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Brasier, Allison M.	Attorney
	Cloward, Benjamin P.	Attorney
	Jaffe, Steven T.	Attorney
	Smith, Jacob S.	Attorney

**JOURNAL ENTRIES**

- Defendant's Motion for Leave to Amend Answer and Motion in Limine No. 9 to Preclude Plaintiff from Arguing When Defendant Khoury Admitted Liability on Order Shortening Time Plaintiff's Motion in Limine No. 2 Preclude Defendants From a Raising as Minor Impact or Low Impact Defense and To Exclude evidence of Property Damage on an Order Shortening Time Plaintiff's Motion in Limine No. 3 To Exclude Defendants' Expert Harry Smith From Testifying on an Order Shortening Time

Procedural objection by Mr. Jaffe. Argument regarding Rule 2.47 and 2.26; no opportunity to brief; therefore Plaintiff's Motions in Limine should not be heard. Opposition by Mr. Cloward. Court finds the rule clear and after reviewing the Affidavit of Service. COURT ORDERED, Plaintiff's Motions in Limine OFF CALENDAR as not timely served.

Mr. Jaffe argued in support of Defendant's Motion for Leave to Amend Answer and Motion in Limine No. 9 to Preclude Plaintiff from Arguing When Defendant Khoury Admitted Liability on Order Shortening Time . Opposition by Mr. Cloward. COURT ORDERED, as to Motion for Leave to Amend Answer, GRANTED; as to Motion in Limine No. 9 to Preclude Plaintiff from Arguing When

Defendant Khoury Admitted Liability, DENIED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**July 16, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**July 16, 2013      9:00 AM      Jury Trial**

**HEARD BY:**    Wiese, Jerry A

**COURTROOM:**

**COURT CLERK:**    Alice Jacobson

**RECORDER:**

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Brasier, Allison M.	Attorney
	Cloward, Benjamin P.	Attorney
	Jaffe, Steven T.	Attorney
	Smith, Jacob S.	Attorney

**JOURNAL ENTRIES**

- OUTSIDE THE PRESENCE OF THE PROSPECTIVE JURY. Colloquy regarding jury selection and challenge for cause.

PROSPECTIVE JURY PRESENT. Jury sworn. Role Call. General Voir Dire conducted.

PROSPECTIVE JURY PRESENT. General Voir Dire conducted.

OUTSIDE THE PRESENCE OF THE PROSPECTIVE JURY. Juror questioned outside the presence of the rest of the juror. COURT EXCUSED the juror. Mr. Jaffe moved for a Mistrial. COURT ORDERED, mistrial DENIED.

PROSPECTIVE JURY PRESENT. General Voir Dire conducted.

COURT ADMONISHED and EXCUSED the prospective jury panel for the evening. COURT ORDERED, trial CONTINUED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**July 17, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**July 17, 2013      9:00 AM      Jury Trial**

**HEARD BY:**    Wiese, Jerry A

**COURTROOM:**

**COURT CLERK:**    Katherine Streuber

**RECORDER:**

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Brasier, Allison M.	Attorney
	Cloward, Benjamin P.	Attorney
	Jaffe, Steven T.	Attorney
	Khoury, Raymond Riad	Defendant
	Seastrand, Margaret G.	Plaintiff
	Smith, Jacob S.	Attorney

**JOURNAL ENTRIES**

- Robert Eglet Esq. present during jury selection. Potential Jury Panel Present. CONFERENCE AT THE BENCH. Voir Dire Continues. CONFERENCE AT THE BENCH. Voir Dire Continues. CONFERENCE AT THE BENCH. Voir Dire Continues. CONFERENCE AT THE BENCH. Voir Dire Continues. OUTSIDE THE PRESENCE OF POTENTIAL JURY PANEL. Potential Jury Panel Present. Voir Dire Continues and Peremptory Challenges exercised. CONFERENCE AT THE BENCH. Jury SELECTED. OUTSIDE THE PRESENCE OF THE JURY. Mr. Eglet excused. Arguments by counsel regarding bio-mechanics. Court advised it would defer its ruling until after briefs have been received and reviewed. Further arguments by counsel regarding demonstrative exhibits. Court advised it would allow party to reference the video, however, it will not be played for the jury as it was not disclosed to defense. Further arguments by counsel regarding Plaintiff's Interrogatories and police officer's testimony as to his opinions. Court advised it previously ruled the police officer was only to testify as to what he observed, not his opinions. Exclusionary Rule INVOKED. Further arguments by counsel. Mr. Cloward advised they would pay the overtime for the Court's staff. JURY PRESENT. Court finished instructed the jury. Jury SWORN. Opening statement by Plaintiff. OUTSIDE THE

PRESENCE OF THE JURY. Mr. Jaffe moved for a mistrial as Plaintiff's counsel mentioned insurance term, which is a direct violation of the law. Court stated its findings and ORDERED, Motion for Mistrial is DENIED. Mr. Cloward stated it was a poor choice of words. Arguments by counsel regarding admission of Power Points as exhibits. Court advised it is too much material for the vault and request DENIED. JURY PRESENT. Opening statement by Defense. CONFERENCE AT THE BENCH. Opening Statement continued. CONFERENCE AT THE BENCH. Opening Statement continued. Testimony and exhibits presented. (See worksheets) CONFERENCE AT THE BENCH. Testimony and exhibits presented. (See worksheets) OUTSIDE THE PRESENCE OF THE JURY. Evening Recess.

07-18-13 1:00 PM JURY TRIAL

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**July 18, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**July 18, 2013      1:00 PM      Jury Trial**

**HEARD BY:**    Wiese, Jerry A

**COURTROOM:**

**COURT CLERK:**    Alice Jacobson

**RECORDER:**

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Brasier, Allison M.	Attorney
	Cloward, Benjamin P.	Attorney
	Jaffe, Steven T.	Attorney
	Smith, Jacob S.	Attorney

**JOURNAL ENTRIES**

- OUTSIDE THE PRESENCE OF THE JURY: Argument by Mr. Jaffe regarding Dr. Grover's testimony. Objection by Mr. Cloward. COURT ORDERED, Mr. Grover allowed to testify.

IN THE PRESENCE OF THE JURY: Exhibits presented and admitted. Witness testimony. (See Worksheets)

OUTSIDE THE PRESENCE OF THE JURY: Objections put on the record by counsel.

IN THE PRESENCE OF THE JURY: Exhibits presented and admitted. Witness testimony. (See Worksheets)

COURT ADMONISHED and EXCUSED the jury for the evening. COURT ORDERED, trial CONTINUED.



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**July 19, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**July 19, 2013      9:00 AM      Jury Trial**

**HEARD BY:**    Wiese, Jerry A

**COURTROOM:**

**COURT CLERK:**    Alice Jacobson

**RECORDER:**

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Brasier, Allison M.	Attorney
	Cloward, Benjamin P.	Attorney
	Jaffe, Steven T.	Attorney
	Smith, Jacob S.	Attorney

**JOURNAL ENTRIES**

- IN THE PRESENCE OF THE JURY: Witness testimony. Exhibits presented and admitted. (see worksheets).

OUTSIDE THE PRESENCE OF THE JURY: Objections put on the record by counsel.

IN THE PRESENCE OF THE JURY: Witness testimony. Exhibits presented and admitted. (see worksheets).

COURT ADMONISHED and EXCUSED the jury for the evening. COURT ORDERED, trial CONTINUED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**July 22, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**July 22, 2013      9:00 AM      Jury Trial**

**HEARD BY:**    Wiese, Jerry A

**COURTROOM:**

**COURT CLERK:**    Alice Jacobson

**RECORDER:**

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Brasier, Allison M.	Attorney
	Cloward, Benjamin P.	Attorney
	Jaffe, Steven T.	Attorney
	Smith, Jacob S.	Attorney

**JOURNAL ENTRIES**

- IN THE PRESENCE OF THE JURY: Witness testimony. Exhibits presented and admitted. (see worksheets).

OUTSIDE THE PRESENCE OF THE JURY: Objections put on the record by counsel. Argument regarding inconsistent statement of accelerating and not accelerating in the police report. COURT ORDERED, will allow statement and will allow in cross examination.

IN THE PRESENCE OF THE JURY: Witness testimony. Exhibits presented and admitted. (see worksheets).

COURT ADMONISHED and EXCUSED the jury for the evening. COURT ORDERED, trial CONTINUED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**July 23, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**July 23, 2013      9:00 AM      Jury Trial**

**HEARD BY:**    Wiese, Jerry A

**COURTROOM:**

**COURT CLERK:**    Alice Jacobson

**RECORDER:**

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Brasier, Allison M.	Attorney
	Cloward, Benjamin P.	Attorney
	Jaffe, Steven T.	Attorney
	Smith, Jacob S.	Attorney

**JOURNAL ENTRIES**

- OUTSIDE THE PRESENCE OF THE JURY: Request by Mr. Jaffe for the jury to view the physical car in person. Objection by Mr. Cloward. Court expressed concern of possibly contaminating the jury and to use pictures in place of. COURT ORDERED, ruling RESERVED.

IN THE PRESENCE OF THE JURY: Witness testimony. Exhibits presented and admitted. (see worksheets).

OUTSIDE THE PRESENCE OF THE JURY: Objections put on the record by counsel. Mr. Cloward requested Richard Harris to testify. Objection by Mr. Jaffe. COURT ORDERED, Mr. Harris not allowed to testify as he was not previously disclosed.

IN THE PRESENCE OF THE JURY: Witness testimony. Exhibits presented and admitted. (see worksheets). Plaintiff Rests.

COURT ADMONISHED and EXCUSED the jury for the evening. COURT ORDERED, trial CONTINUED; request for jurors to view the vehicle in person DENIED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**July 24, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**July 24, 2013      9:00 AM      Jury Trial**

**HEARD BY:**    Wiese, Jerry A

**COURTROOM:**

**COURT CLERK:**    Alice Jacobson

**RECORDER:**

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Brasier, Allison M.	Attorney
	Cloward, Benjamin P.	Attorney
	Jaffe, Steven T.	Attorney
	Seastrand, Margaret G.	Plaintiff
	Smith, Jacob S.	Attorney

**JOURNAL ENTRIES**

- IN THE PRESENCE OF THE JURY: Witness testimony. Exhibits presented and admitted. (see worksheets).

OUTSIDE THE PRESENCE OF THE JURY: Objections put on the record by counsel. COURT ORDERED, testimony allowed as long as consistent with the report.

IN THE PRESENCE OF THE JURY: Witness testimony. Exhibits presented and admitted. (see worksheets).

COURT ADMONISHED and EXCUSED the jury for the evening. COURT ORDERED, trial CONTINUED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**July 25, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**July 25, 2013      9:00 AM      Jury Trial**

**HEARD BY:**    Wiese, Jerry A

**COURTROOM:**

**COURT CLERK:**    Alice Jacobson

**RECORDER:**

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Brasier, Allison M.	Attorney
	Cloward, Benjamin P.	Attorney
	Jaffe, Steven T.	Attorney
	Seastrand, Margaret G.	Plaintiff
	Smith, Jacob S.	Attorney

**JOURNAL ENTRIES**

- OUTSIDE THE PRESENCE OF THE JURY: Jury Instructions settled on the record.

IN THE PRESENCE OF THE JURY: Court instructed the Jury. Closing statements by counsel.  
Alternates #9 and #10 excused.

COURT ADMONISHED and EXCUSED the jury for the evening. COURT ORDERED, trial  
CONTINUED for Jury Deliberation.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**July 26, 2013**

---

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

---

**July 26, 2013      9:00 AM      Jury Trial**

**HEARD BY:**    Wiese, Jerry A

**COURTROOM:**

**COURT CLERK:**    Alice Jacobson

**RECORDER:**

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Brasier, Allison M.	Attorney
	Jaffe, Steven T.	Attorney
	Khoury, Raymond Riad	Defendant
	Kunin-Leavitt, Shoshana	Attorney
	Seastrand, Margaret G.	Plaintiff
	Smith, Jacob S.	Attorney

**JOURNAL ENTRIES**

- Jury retired to deliberate at 9:00 am. Jury question regarding expert reports put on the record with counsel via telephone conference. At the hour of 2:30pm the Jury returned with a verdict in favor of Plaintiff and against the Defendant. Jury polled. Court thanked and excused the jury.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

## Negligence - Auto

## COURT MINUTES

December 10, 2013

A-11-636515-C      Margaret Seastrand, Plaintiff(s)  
vs.  
Raymond Khoury, Defendant(s)

December 10, 2013      9:00 AM      All Pending Motions

**HEARD BY:** Wiese, Jerry A                      **COURTROOM:** RJC Courtroom 14A

**COURT CLERK:** Alice Jacobson

RECORDER:

REPORTER: Kristy Clark

## PARTIES

PRESENT: Brasier, Allison M. Attorney  
Jaffe, Steven T. Attorney

## JOURNAL ENTRIES

- Defendant Raymond Khoury's Opposition to Plaintiff Margaret Seastrand's Motion for Attorney Fees and Costs and Countermotion to Re-Tax Costs...Pltf Motion for Fees and Reasonable Attorney Fees and Costs

Matter submitted by counsel. COURT ORDERED, as to Plaintiff's Motion for Fees and Reasonable Attorney Fees and Costs; Attorney fees, DENIED; Interest AWARDED; Costs in the total sum of \$75,015.61. COURT FURTHER ORDERED Deft's countermotion DENIED. Counsel further stated the parties had stipulated to stay execution until 12/24/13.

## Exhibit List

Case: A-11-636515-C Party: Sort Order: Status Case Margaret Seastrand, Plaintiff  
(s)  
vs.  
Raymond Khoury, Defendant  
(s)

Exhibit ID	On Behalf Of	Status/Date	Return/Destroy Date	Type and Description	Exhibit Flag	Source	In Custody Of	Location
1	Plaintiff	Admitted 07/19/2013	Destroy 08/09/2015	Document TRAFFIC ACCIDENT REPORT		Brasier, Allison M.		
Comment: SEE COMPLETE LIST IN EVENTS TAB								





**EIGHTH JUDICIAL DISTRICT COURT CLERK'S OFFICE**  
**NOTICE OF DEFICIENCY**  
**ON APPEAL TO NEVADA SUPREME COURT**

**STEVEN T. JAFFE, ESQ.**  
**7425 PEAK DRIVE**  
**LAS VEGAS, NV 89128**

**DATE: December 27, 2013**  
**CASE: A636515**

**RE CASE: MARGARET G. SEASTRAND vs. RAYMOND RIAD KHOURY**

NOTICE OF APPEAL FILED: December 24, 2013

**YOUR APPEAL HAS BEEN SENT TO THE SUPREME COURT.**

**PLEASE NOTE: DOCUMENTS NOT TRANSMITTED HAVE BEEN MARKED:**

- ☒ **\$250 – Supreme Court Filing Fee\*\***
  - If the \$250 Supreme Court Filing Fee was not submitted along with the original Notice of Appeal, it must be mailed directly to the Supreme Court. The Supreme Court Filing Fee will not be forwarded by this office if submitted after the Notice of Appeal has been filed.
- ☐ **\$24 – District Court Filing Fee (Make Check Payable to the District Court)\*\***
- ☒ **\$500 – Cost Bond on Appeal (Make Check Payable to the District Court)\*\***
  - NRAP 7: Bond For Costs On Appeal in Civil Cases
- ☒ **Case Appeal Statement**
  - NRAP 3 (a)(1), Form 2
- ☐ **Order**
- ☐ **Notice of Entry of Order**

*\*\*Per District Court Administrative Order 2012-01, in regards to civil litigants, "...all Orders to Appear in Forma Pauperis expire one year from the date of issuance." You must reapply for in Forma Pauperis status.*

---

**NEVADA RULES OF APPELLATE PROCEDURE 3 (a) (3) states:**

"The district court clerk must file appellant's notice of appeal despite perceived deficiencies in the notice, including the failure to pay the district court or Supreme Court filing fee. **The district court clerk shall apprise appellant of the deficiencies in writing**, and shall transmit the notice of appeal to the Supreme Court in accordance with subdivision (e) of this Rule with a notation to the clerk of the Supreme Court setting forth the deficiencies. Despite any deficiencies in the notice of appeal, the clerk of the Supreme Court shall docket the appeal in accordance with Rule 12."

**Please refer to Rule 3 for an explanation of any possible deficiencies.**

# Certification of Copy

State of Nevada }  
County of Clark } SS:

I, Steven D. Grierson, the Clerk of the Court of the Eighth Judicial District Court, Clark County, State of Nevada, does hereby certify that the foregoing is a true, full and correct copy of the hereinafter stated original document(s):

NOTICE OF APPEAL; CERTIFICATE OF MAILING; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET; JUDGMENT UPON THE JURY VERDICT; NOTICE OF ENTRY OF JUDGMENT; DISTRICT COURT MINUTES; EXHIBITS LIST; NOTICE OF DEFICIENCY

MARGARET G. SEASTRAND,

Plaintiff(s),

vs.

RAYMOND RIAD KHOURY,

Defendant(s),

Case No: A636515

Dept No: XXX

now on file and of record in this office.

IN WITNESS THEREOF, I have hereunto  
Set my hand and Affixed the seal of the  
Court at my office, Las Vegas, Nevada  
This 27 day of December 2013.

Steven D. Grierson, Clerk of the Court



Teodora Jones, Deputy Clerk