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Tracie K. Lindeman  
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9 *Attorneys for Defendant*  
10 *Raymond R. Khoury*

11 **IN THE SUPREME COURT OF THE STATE OF NEVADA**  
12 **OFFICE OF THE CLERK**

13 MARGARET G. SEASTRAND,

14 Plaintiff,

15 vs.

16 RAYMOND RIAD KHOURY; DOES  
17 1 through 10; and ROE ENTITIES 11  
through 20, inclusive,

18 Defendants.

Supreme Court No.: 64702

District Court Case No. A-11-636515-C  
(Wiese, J.)

19 **CASE APPEAL STATEMENT**

- 20 1. Name of appellant filing this case appeal statement:  
21 a. RAYMOND RIAD KHOURY  
22 2. Identify the judge issuing the decision, judgment or order appealed from:  
23 The Honorable Jerry Wiese, Clark County District Court Judge.  
24 3. Identify all parties to the proceeding in the district court:  
25 a. Plaintiff MARGARET SEASTRAND; and  
26 b. Defendant RAYMOND RIAD KHOURY.  
27 4. Identify all parties involved in this appeal:  
28 a. Appellant RAYMOND RIAD KHOURY; and

1           b.     Respondent MARGARET SEASTRAND.

2           5.     Set forth the name, law firm, address, and telephone number of all counsel on  
3 appeal and identify the party or parties whom they represent:

4           a.     Counsel for Appellant           Steven T. Jaffe, Esq.  
5                   RAYMOND R. KHOURY       James E. Harper, Esq.  
6   Jacob S. Smith, Esq.  
7   HALL, JAFFE & CLAYTON, LLP  
8   7425 Peak Drive  
9   Las Vegas, NV. 89128  
10    (702) 316-4111

11           b.     Counsel for Respondent:       Richard Harris, Esq.  
12                   MARGARET SEASTRAND       Alison Brasier, Esq.  
13   Benjamin Cloward, Esq.  
14   RICHARD HARRIS LAW FIRM  
15   801 S. Fourth Street  
16   Las Vegas, Nevada 89101  
17   (702) 444-4444

18           6.     Indicate whether appellant was represented by appointed or retained counsel in  
19 the district court:

20           a.     Appellants:           Retained counsel listed above.  
21           b.     Respondents:        Retained counsel listed above.

22           7.     Indicate whether appellant is represented by appointed or retained counsel on  
23 appeal:

24           a.     Appellants:           Retained counsel listed above.  
25           b.     Respondents:        Retained counsel listed above.

26           8.     Indicate whether appellant was granted leave to proceed in forma pauperis, and  
27 date of entry of the district court order granting such leave:

28                   No such order was sought by the Appellants nor granted by the District Court.

29           9.     Indicate the date the proceedings commenced in the district court:

30                   The Complaint was filed March 8, 2007.

31           10.    Provide a brief description of the nature of the action, including the type of  
32 judgment or order being appealed and the relief granted by the district court:

33                   This action stems from a rear-end auto accident and the disputed causation of alleged

1 injuries to Margaret Seastrand. As set forth in the Notice of Appeal, Appellant is appealing  
2 all judgments and orders in this case, including the judgment upon jury verdict, which was  
3 filed on November 5, 2013.

4 Included in those judgments and orders are the district court's rulings on various  
5 motions *in limine* seeking to admit evidence of medical liens, to admit evidence of both the  
6 amounts billed by Seastrand's medical providers as well as the amounts paid for those same  
7 services, to limit Seastrand's treating physicians to the opinions in their clinical records and  
8 file, to preclude Seastrand's treating physicians from rebutting Defense experts without a  
9 report, and to preclude Plaintiff from using specific verdict amounts during voir dire. The  
10 appeal involves the rulings made by the court with respect to the admission or preclusion of  
11 such evidence at trial.

12 Also encompassed in the appeal are the trial court's rulings in allowing Plaintiff's  
13 experts to testify beyond the scope of their expertise and express new and previously  
14 undisclosed opinions at trial.

15 Finally, the appeal also encompasses the trial court's rulings with respect to the scope  
16 of jury voir dire, the Plaintiff's use of specific jury amounts during voir dire, the Plaintiff's  
17 indoctrination of potential jurors during voir dire, and the court's decision during voir dire  
18 to strike, for cause, various potential jurors who had expressed and demonstrated an ability  
19 to be fair and partial even in the face of Plaintiff's indoctrination efforts.

20 11. Indicate whether the case has previously been the subject of the appeal to or  
21 original writ petition:

22 This case has not previously been the subject of an appeal or writ petition.

23 12. Indicate whether the appeal involves child custody or visitation:

24 This case does not involve child custody or visitation.


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27 ///  
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1 13. Indicate whether the appeal involves the possibility of settlement:  
2 No.

3 DATED this 14 day of January, 2014.

4 HALL JAFFE & CLAYTON, LLP

5  
6 By:

  
7 STEVEN T. JAFFE, ESQ.  
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