

IN THE MATTER OF: THE GUARDIANSHIP
OF THE PERSON AND ESTATE OF JEAN
RUTH ECHEVARRIA, AN ADULT WARD.

) NO: 65598

Electronically Filed
Jul 28 2015 02:24 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

MICHAEL A. ECHEVARRIA,

Appellant,

VS.

ROBERT L. ANSARA and ANGEL
ECHEVARRIA,

Respondents.

**REPLY TO OPPOSITION TO MOTION TO MODIFY RECORD ON
APPEAL BY FILING APPENDIX TO INCLUDE DISTRICT COURT
PLEADINGS AND MINUTES POST-DATING THE PREPARATION OF
THE ORIGINAL RECORD**

Respondent, ROBERT L. ANSARA, by and through his counsel, ELYSE M. TYRELL, ESQ., of the law firm of Trent, Tyrell & Associates, hereby submits the instant Reply to Opposition to Motion to Modify Record on Appeal by Filing Appendix to Include District Court Pleadings and Minutes Post-Dating the Preparation of the Original Record, and who respectfully reports the following for this Honorable Court's consideration:

Appellant, MICHAEL A. ECHEVARRIA (“MICHAEL”) has filed an Opposition to the Motion to Expand Record on Appeal filed by Respondent, ROBERT L. ANSARA (“ROBERT”), arguing that (1) the additional documents and minutes in the District Court which post-date the original submission of the record are irrelevant to the issues presented to this Court and that (2) N.R.A.P. 10 (c) is procedural only and does not support ROBERT’s request.

To the contrary, the additional documents and minutes in the District Court which ROBERT seeks to include in the record are relevant to ROBERT’s position as expressed in the Summary of Argument in his Respondent’s Answering Brief, in that they provide this Court with additional confirmation of the time line in which MICHAEL attempted to domesticate and/or assert his judgment.

Further, the inclusion of those additional documents and minutes serve as further proof of MICHAEL’s behavior throughout the district court proceedings which are relevant to ROBERT’s unclean hands and estoppel arguments.

Not only does N.R.A.P. 10(c) clearly provide for the correction or modification of the record, but N.R.A.P. 10(a) defines what the record shall consist of, stating: ... “The trial court record consists of the papers and exhibits filed in the district court, the transcript of the proceedings, if any, the district court minutes, and the docket entries made by the district court clerk.”

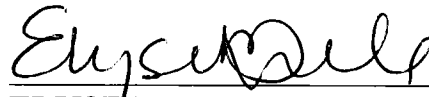
In light of the foregoing, ROBERT would respectfully request that this Honorable Court allow the following documents and minutes to be entered in the Record on Appeal so as to provide the Court with a true, accurate and current history of the district court proceedings incident to the case at bar which have occurred thus far:

- a. Motion by Judgment Creditor for an Order Directing the Issuance of a Writ of Execution filed on June 19, 2014.
- b. Objection to Motion by Judgment Creditor for an Order Directing the Issuance of a Writ of Execution filed on July 22, 2014.
- \ c. Joinder to Robert L. Ansara's Objection to Motion by Judgment Creditor for an Order Directing the Issuance of a Writ of Execution filed on July 30, 2014, by Respondent, ANGEL ECHEVARRIA.
- d. Minutes from the hearing conducted in the District Court on the 31st day of July, 2014.
- e. Application in Support of Extension of Time in Which to File Final Account and Report filed on August 4, 2014.
- e. Order Granting Extension of Time for Filing Final Account and

Report filed on August 11, 2014 and the Notice of Entry of Order for
filed on August 12, 2014.¹

Respectfully submitted this 28th day of July, 2015.

TRENT, TYRELL & ASSOCIATES



ELYSE M. TYRELL, ESQ.

Nevada Bar No: 5531

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CERTIFICATE OF SERVICE

1. Electronic Service through the Court e-filing system:

I hereby certify that, on this 28th day of July, 2015, I submitted the
foregoing Reply to Opposition to Motion to Modify Record on Appeal by Filing
Appendix to Include District Court Pleadings and Minutes Post-Dating the
Preparation of the Original Record for filing and service via the Court's electronic

¹ROBERT concedes that the Application for Extension of Time in Which to
File Final Account and Report, the Order Granting Extension of Time and the
Notice of Entry of Order are not necessarily relevant to the issues on appeal and
has no opposition to the exclusion of those three documents from the Record on
Appeal.

filing system. Electronic notification will be sent to the following:

Elizabeth Brickfield, Esq.

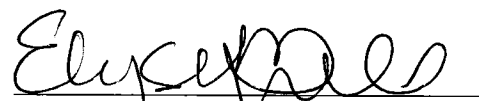
Beau Sterling, Esq.

Mark Solomon, Esq.

Elyse M. Tyrell, Esq.

Jeanette E. McPherson, Esq.

Jason A. Imes, Esq.



ELYSE M. TYRELL, ESQ.
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Robert L. Ansara