## IN THE SUPREME COURT OF THE STATE OF NEVADA

RHONDA HELENE MONA and MICHAEL J. MONA, JR.,

Petitioners,

v.

THE EIGHTH JUDCIAL DISTRICT COURT FOR THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK, AND THE HONORABLE JOE HARDY, DISTRICT JUDGE

Respondents,

and

FAR WEST INDUSTRIES,

Real Party in Interest.

Electronically Filed Jul 29 2015 10:38 a.m. Tracie K. Lindeman Clerk of Supreme Court

Case No.: 68434

District Court Case No.: A-12-670352-F

## DECLARATION IN SUPPORT OF REAL PARTY IN INTEREST FAR WEST INDUSTRIES' MOTION TO EXCEED PAGE LIMIT

- I, F. Thomas Edwards, Esq., declare as follows:
- 1. I am an attorney with the law firm of Holley Driggs Walch Fine Wray Puzey & Thompson. The following is based on my knowledge gathered from my review of the documents and preparation of the Opposition to Petitioners' Emergency Motion for Relief Under NRAP 27(e) ("Opposition") in this proceeding, and if called as a witness, I could and would testify to the following:
  - 2. I represent Real Party in Interest, Far West Industries ("Far West").

- 3. This case has a long and complicated history which is extremely relevant to the Opposition. Background facts are necessary to give the complete picture of Petitioners Rhonda Helene Mona and Michael J. Mona, Jr.'s ("Petitioners") conduct that warranted issuance of the underlying Order Regarding Order to Show Cause Why Accounts of Rhonda Mona Should Not Be Subject to Execution and Why the Court Should Not Find Monas in Contempt ("Sanction Order") by the Eighth Judicial District Court ("District Court").
- 4. Petitioners' Emergency Motion for Relief Under NRAP 27(e) ("Emergency Motion") raises multiple issues, including personal jurisdiction, procedural due process, community property law, and execution of judgments, which warrants extensive briefing.
- 5. The Emergency Motion incorporates by reference the Petitioners' 30-page Petition for Writ of Mandamus or Prohibition, in substance giving the Petitioners the advantage of an additional 30 pages of briefing.
- 6. Far West has a substantial interest in its enforcement rights as a judgment creditor. This is especially true here because Petitioners seek to stay Far West's entire judgment enforcement proceeding, not only the Sanction Order.
- 7. Far West worked diligently to present its Opposition in a concise, well-organized manner. However to sufficiently address the facts and arguments

implicated by the Emergency Motion, Far West was unable to accomplish this in ten pages of 14-point font. As a result, Far West Industries' Opposition is 20 pages.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 29th day of July, 2015.

/s/ F. Thomas Edwards F. THOMAS EDWARDS

## **CERTIFICATE OF MAILING**

I HEREBY CERTIFY that, on the and correct copy of the foregoing Declaration In Support Of Real Party In Interest Far West Industries' Motion to Exceed Page Limit, postage prepaid and addressed to:

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/// /// The Honorable Joe Hardy Eighth Judicial District Court Department XV 200 Lewis Avenue Las Vegas, Nevada 89155

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