

In the Supreme Court of Nevada

CRISTINA PAULOS,
Appellant,

vs.
FCH1, LLC; LAS VEGAS
METROPOLITAN POLICE
DEPARTMENT; JEANNIE
HOUSTON; and AARON BACA,
Respondents.

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Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR JUDICIAL NOTICE OF RELATED PROCEEDINGS

Appellant Cristina Paulos asks this Court to take judicial notice of related proceedings in two cases:

- *Paulos v. FCH1, LLC, et al.*, Case No. A666754: The initial pleadings in Paulos’s original state-court action before its removal to federal court (1 App. 1–101)
- *Paulos v. FCH1, LLC, et al.*, Case No. 2:131-cv-1546-JCM-PAL: The briefing, judgment, and mandate on summary judgment in the federal-court action following removal (1 App. 102–3 App. 605)

This appeal is from the dismissal of the third case (A716850), the refiled state-court action following the dismissal of the claims in federal court.

This Court has may take judicial notice of records in another case that bear a “close relationship” to this case. *Occhiuto v. Occhiuto*, 97 Nev. 143, 145, 625 P.2d 568, 569 (1981). The *fact* of these related proceedings (separate from the question of the parties’ contentions within the proceeding) is accurate and undisputed. See NRS 47.130(2). Taking judicial notice is appropriate in these circumstances. See *Mack v. Estate of Mack*, 125 Nev. 80, 91, 206 P.3d 98, 106 (2009); *Lindsey v. Lindsey*, 200 So. 2d 643, 643–44 (Fla. Dist. Ct. App. 1967); *Commonwealth ex rel. Branch v. Branch*, 104 A.2d 183, 184–85 (Pa. Super. Ct. 1954); *State ex rel. LeCompte v. Keckler*, 628 N.W.2d 749, 754 & n.7 (S.D. 2001).

Here, it is important to see this case’s history in state in federal court to assess the district court’s application of issue preclusion.

Dated this 24th day of October, 2018.

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CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2018, I submitted the foregoing “Motion for Judicial Notice of Related Proceedings” for filing *via* the Court’s eFlex electronic filing system. Electronic notification will be sent to the following:

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