

1 IN THE SUPREME COURT OF THE STATE OF NEVADA

2
3 145 EAST HARMON II TRUST; AND
4 ANTHONY TAN AS TRUSTEE OF THE
5 145 EAST HARMON II TRUST,

6 Appellants,

7 v.

8 THE RESIDENCES AT MGM GRAND
9 TOWER A OWNERS' ASSOCIATION,

10 Respondent.

Supreme Court No.: 75920

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Apr 24 2020 04:09 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

11 **REPLY TO APPELLANTS' OBJECTION TO RESPONDENT'S BILL OF COSTS**

12 COMES NOW the Respondent, by and through its counsel of record, BRENT LARSEN,
13 ESQ. of the law firm of SINGER & LARSEN P.C., and hereby submits Respondent's Reply to
14 Appellants' Objection to Respondent's Memorandum of Costs on Appeal.

15 The Appellants have raised two issues in their objection to Respondent's Bill of Costs.
16 *First*, Appellants correctly point out that there is a discrepancy of the amount being claimed in
17 the body of the Memorandum of Costs, as opposed to the "Conclusion" of the Memorandum of
18 Costs. The body correctly states the amount sought for recovery in the amount of \$77.25. The
19 amount stated in the Conclusion of \$59.75 is an obvious typographical error that was not picked
20 up at the time the document was filed.

21 *Second*, Appellants claim that it was unnecessary to produce photocopies of
22 Respondent's Answering Brief and Appendix. The reason for producing photocopies is to have
23 the briefs and pertinent portions of the Appellants' Appendix and Respondent's Appendix put
24 into binders and to send the client copies of such documents. The undersigned counsel finds it
25 much easier to work on district court and appellate court briefs by having available 3-ring
26 binders containing all the necessary appendix documents. We also find that our work becomes
27 easier when we keep one set of binders that contains clean and unmarked copies and another set
28 of binders that is used for markup copies. Binders make it easier for the undersigned counsel to
take work home with him at times and for working with other counsel to get their thoughts on

1 various portions of the briefs being written or critiqued. The reproduction of electronically filed
2 material and putting such documents into binders has been the normal course of the undersigned
3 doing business for well over 20 years. Thus, the undersigned counsel believes that in order to
4 make his job easier, we made the decision to reproduce documents to place into loose-leaf
5 binders.

6 DATED this 24th day of April, 2020.

7 Respectfully submitted,

8 SINGER & LARSEN P.C.

9
10 /s/ Brent Larsen, Esq.

11 BRENT LARSEN, ESQ.

12 Nevada Bar No. 1184

13 1291 Galleria Drive, #230

14 Henderson, Nevada 89014

15 Attorney for Respondent

16 **CERTIFICATE OF SERVICE**

17 I hereby certify that service of Respondent's REPLY TO APPELLANTS' OBJECTION
18 TO RESPONDENT'S BILL OF COSTS was made this 24th day of April, 2020, by electronic
19 service through the Nevada Supreme Court's electronic filing system, to each of the following:

20 David J. Kaplan, Esq.
(djkaplan5@gmail.com)

21 Attorney for Appellant

22 Luis A. Ayon, Esq.
(laayon@ayonlaw.com)

23 Attorney for Appellant

24
25
26
27 /s/ Suzanne Saavedra-Zaranti

28 An employee of Singer & Larsen P.C.