

Nos. 76198, 77007

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**IN THE SUPREME COURT OF THE STATE OF NEVADA**

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TRUDI LEE LYTLE; JOHN ALLEN LYTLE; AND  
LYTLE TRUST,  
Appellants,

Electronically Filed  
Jan 21 2020 03:18 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

vs.

SEPTEMBER TRUST, DATED MARCH 23, 1972; GERRY R. ZOBRIST AND  
JOLIN G. ZOBRIST, AS TRUSTEES OF THE GERRY R. ZOBRIST AND  
JOLIN G. ZOBRIST FAMILY TRUST; RAYNALDO G. SANDOVAL AND  
JULIE MARIE SANDOVAL GEGEN, AS TRUSTEES OF THE RAYNALDO G.  
AND EVELYN A. SANDOVAL JOINT LIVING AND DEVOLUTION TRUST  
DATED MAY 27, 1992; AND DENNIS A. GEGEN AND JULIE S. GEGEN,  
HUSBAND AND WIFE, AS JOINT TENANTS,  
Respondents.

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On Appeal from an Order of the Eighth Judicial District Court, Clark  
County, Nevada; The Honorable Mark B. Bailus, District Court Judge;  
District Court Case No. A-17-765372-C

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**RESPONDENTS' RESPONSE TO JANUARY 10, 2020 ORDER**

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Attorneys for Respondents

Respondents hereby respond to the Order issued by the Court on January 10, 2020 regarding the interest of Dr. Jacques Lamothe (“Dr. Lamothe”) in this Case. Dr. Lamothe is not a party to Case Nos. 76198 or 77007. However, Respondents are informed that Dr. Lamothe is a trustee of the Jacques & Linda Lamothe Living Trust (“Lamothe Trust”), a plaintiff in one of the consolidated actions below. The Lamothe Trust is represented by separate counsel (Daniel T. Foley, Esq.) and the Respondents cannot speak on behalf of the Lamothe Trust.

However, Respondents are informed and believe that the Lamothe Trust was the owner of a residential lot within the Rosemere Estates subdivision that is the subject of these cases and obtained similar relief as the Respondents through separate orders. Respondents believe that the relief granted to the Lamothe Trust was based upon the same facts and law as the relief granted to the Respondents. There may be other pending appeals stemming from the orders involving the Lamothe Trust (to which the Respondents are not a party). Although the Lamothe Trust is not directly a party to the appeals in Case Nos. 76198 or 77007, Respondents believe the outcome of these appeals will impact any appeals involving the Lamothe Trust.

DATED this 21st day of January, 2020.

CHRISTENSEN JAMES & MARTIN

By: /s/ Wesley J. Smith, Esq.  
Wesley J. Smith, Esq. (11871)  
*Attorneys for Respondents*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this date, the 21st day of January, 2020, I submitted the foregoing RESPONDENTS' RESPONSE TO JANUARY 10, 2020 ORDER for filing and service through the Court's eFlex electronic filing service. According to the system, electronic notification will automatically be sent to the following:

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