

James J. Pisanelli, Esq., Bar No. 4027
JJP@pisanellibice.com
Todd L. Bice, Esq., Bar No. 4534
TLB@pisanellibice.com
Debra L. Spinelli, Esq., Bar No. 9695
DLS@pisanellibice.com
PISANELLI BICE PLLC
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101
Telephone: 702.214.2100

Electronically Filed
Aug 13 2018 11:59 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

Kenneth G. Schuler, Esq.
(*pro hac vice* pending)
kenneth.schuler@lw.com
Michael J. Faris, Esq.
(*pro hac vice* pending)
michael.faris@lw.com
Alex Grabowski, Esq.
(*pro hac vice* pending)
alex.grabowski@lw.com
LATHAM & WATKINS LLP
330 North Wabash Avenue, Suite 2800
Chicago, IL 60611
Telephone: 312.876.7659
Attorneys for Alvogen, Inc.

Angela Walker, Esq.
(*pro hac vice* pending)
angela.walker@lw.com
LATHAM & WATKINS LLP
555 Eleventh Street, NW, Suite 1000
Washington, DC 20004-1304
Telephone: 202.637.3321

IN THE SUPREME COURT OF THE STATE OF NEVADA

STATE OF NEVADA; NEVADA
DEPARTMENT OF CORRECTIONS;
JAMES DZURENDA, director of the
Nevada department of corrections, in
his official capacity; IHSAN AZZAM,
Ph.D, M.D., Chief Medical Officer of
the State of Nevada, in his official
capacity; and JOHN DOE, Attending
Physician at Planned Execution of
Scott Raymond Dozier in his official
capacity,

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, IN AND FOR THE
COUNTY OF CLARK; AND THE
HONORABLE ELIZABETH
GONZALEZ, DISTRICT JUDGE,

Respondents,

ALVOGEN, INC.,

Real Party in Interest.

Case No. 76485

District Court Case No. A-18-777312-B

**OPPOSITION TO EMERGENCY
MOTION UNDER NRAP 27(e) TO
STAY DISTRICT COURT
PROCEEDINGS PENDING THIS
COURT'S DECISION ON THE
PETITION; COUNTERMOTION TO
DISMISS THE WRIT PETITION**

I. INTRODUCTION

The State's¹ request for a stay of discovery conflicts with its claimed need for a speedy resolution of this case. It was the *State's* demand for voluminous discovery that prompted the District Court to delay scheduling the preliminary injunction hearing. At no time did the State suggest an accelerated schedule, or claim any risk of drug expiration. Indeed, the District Court noted that if the State wanted to rethink its scope of discovery, it would promptly schedule a preliminary injunction hearing. The State pointedly declined.

The State and its agents' blatant reversal of course before this Court rests on its representations that appellate review cannot wait for a preliminary injunction hearing and fulsome record because a batch of an entirely different drug than the one at issue in Real Party in Interest Alvogen, Inc.'s ("Alvogen") Complaint, Cisatracurium, is ostensibly set to expire on November 30, 2018, and may not be available for use in the execution of Raymond Scott Dozier ("Dozier"). But in its efforts to so convince this Court, the State omitted that it has other batches of that very same drug that would permit it to carry out Dozier's execution well into the year 2019, and that the District Court placed no restriction on the State's execution of Dozier, so long as it did not use Alvogen's product.

¹ For ease of reference, Alvogen will refer collectively to petitioners the State of Nevada, the Nevada Department of Corrections, James Dzurenda, Ihsan Azzam, and John Doe as "the State."

Accordingly, any claim of an emergency is manufactured. And regardless, the District Court has stated its intent to conduct the preliminary injunction hearing in advance of the State's claimed deadline, which will leave this Court with an actual record to review.

Rather than stay discovery and interfere with the District Court's efforts to conduct a preliminary injunction hearing where a more complete record can be developed, this Court should promptly dismiss this Petition. The State has an adequate legal remedy should it fail to prevail at the upcoming injunction hearing.

II. BACKGROUND

A. The District Court Temporarily Restrains the State's Use of an Illegitimately-Acquired Drug and Authorizes Prompt Discovery.

The State distorts the record by characterizing the District Court's temporary restraining order ("TRO") as a "stay of execution." The State knows better. Indeed, it is the State who sought the order of Judge Togliatti that stayed Dozier's execution on July 11, 2018, pursuant to NRS 176.486, 176.487, and 176.488. (App. Vol. II, 444-46.) And, the State knows exactly why the District Court entered its TRO – one which the District Court emphasized did not stay Dozier's execution. The TRO only precludes the State and its agents from using Alvogen's Midazolam in capital punishment "until further order" of the Court. (App. Vol. II, 430.)

As the State admitted to the District Court during the TRO hearing, Alvogen provided written notice to various Petitioners on April 20, 2018 that they were

prohibited from obtaining or using Alvogen's Midazolam for executions – a purpose that is not FDA-approved. (App. Vol. I, 243-46.) The State and its agents then blatantly violated the terms of that notice and Alvogen's legal rights by surreptitiously making three purchases of Alvogen's Midazolam (May 9, 11, and 29, 2018) through a third-party supplier (Cardinal Health) in order to use that product in executions. (*Id.* at 187.)

The State knew such acquisitions were illegitimate, as evidenced by its efforts to conceal its actions even when faced with public requests for disclosure. It took a lawsuit by the ACLU and an order by First Judicial District Judge Wilson on July 6, 2018, to force the State to disclose the drugs it intended to use in Dozier's execution. (*Id.* at 186.) With that disclosure, Alvogen was informed of the State's unlawful purchases and promptly sought relief.²

The District Court heard extensive arguments on July 11, 2018, and entered a Temporary Restraining Order prohibiting the State from using Alvogen's Midazolam in capital punishment pending further order. (App. Vol. II, 429-31.) The District Court explicitly did *not* prohibit or stay Dozier's execution: "the

² Alvogen asserts eight causes of action in its complaint: 1) acquisition of a controlled substance by misrepresentation, fraud, deception or subterfuge; 2) acquisition by a physician of a controlled substance by misrepresentation, fraud, deception or subterfuge; 3) unlawful obtainment of a controlled substance; 4) administration of a controlled substance for an illegitimate purpose; 5) unlawful furnishing of a controlled substance; 6) replevin; 7) conversion; and 8) false pretenses.

determination that I'm making today and the issues that have been presented to the Court are not an issue of a stay of execution. The issue presented here is the plaintiff's right to decide not to do business with someone, including the government, especially if there's a fear of misuse of their product." (*Id.* at 414:17-22.)

The District Court also refused to treat the TRO as a preliminary injunction, noting the different burdens and the need for an evidentiary hearing. (*Id.* at 417:9-12.) When the District Court sought to set the preliminary injunction hearing, the State requested that the District Court delay that hearing in favor of discovery. (*Id.* at 423:14-18.) Indeed, the State demanded "substantial" discovery (*id.* at 417:18-25, 418:15-25), prompting the District Court to allow 120 days of discovery. (*Id.* at 419:4-5.) While the District Court was willing to hold the preliminary injunction hearing on an expedited basis (*id.* at 419:24-25), the State opposed doing so, citing its want of discovery. (*Id.* at 421:16-21.)

B. The State's About-Face to this Court.

Now, the State pulls a 180 before this Court, asserting that "there is a serious risk that one or more drugs in the State's lethal injection protocol will expire before this Court has the opportunity to issue a decision. If a ruling comes too late, *the State may lose its ability to carry out Scott Raymond Dozier's capital sentence* – as happened when drugs expired during the prior related writ proceedings." (Mot. to Expedite at 1) (emphasis added). The State insists that it needs resolution well before November 30, 2018, because a batch of Cisatracurium will allegedly expire,

meaning that "if the Court does not issue a ruling in time to use this November batch, the State will lose its ability to carry out an execution." (*Id.* at 1.)

But the State's representations about its inability to carry out Dozier's execution do not appear to square with the drug list the State has provided.³ Accordingly, Alvogen demanded from the State an explanation for the representation. That explanation runs counter to the State's suggestions to this Court. In truth, the State acknowledged to Alvogen that it had other supplies of Cisatracurium, in addition to the one batch that supposedly expires on November 30, 2018.⁴ In fact, the State has sufficient supplies of Cisatracurium to carry out the execution of Dozier well into next year. (Ex. A, Email from T. Bice to J. Smith, Aug. 3, 2018.) Stated bluntly and simply, the State has manufactured a claim of emergency seeking to stampede this Court into a decision without an evidentiary hearing or record, cognizant that such a record will show the illegitimate acquisition and misuse of Alvogen's product. But even accepting the pretense of some emergency, the District Court has confirmed that it intends to act promptly in holding the preliminary injunction hearing; but it is the State who continues to stall: "You've told me you [the State] need longer." (Ex. B, Hr'g Tr., Aug. 6, 2018, 15:6-13.)

³ Notably, Alvogen's Midazolam does not expire until 2020.

III. ARGUMENT

The State's request for a stay runs counter to the claimed need for a prompt resolution. After all, a stay will necessarily delay the case and disrupt the District Court's proceedings. *Aspen Fin. Servs. v. Eighth Jud. Dist. Ct.*, 128 Nev. 635, 646, 289 P.3d 201, 209 (2012). That is why a stay generally requires a "need to 'prevent irreparable injury to the parties or the public' pending [appellate] review." *Nken v. Holder*, 556 U.S. 418, 442, 129 S. Ct. 1749, 1760 (2009) (citations omitted). As this Court recognized in *Hansen v. Eighth Jud. Dist. Ct.*, 116 Nev. 650, 658-69, 6 P.3d 982, 987 (2000), even when serious legal issues are presented, the party seeking a stay must still satisfy the heavy burden of showing that the equities warrant disruption of the District Court's process. If not, there is no justification for the delay a stay inflicts. *Ruckelshaus v. Monsanto Co.*, 463 U.S. 1315, 1317-18, 104 S. Ct. 3, 4 (1983).

A. The State Shows no Grounds for a Stay.

The State clamors that there is an emergency need for a stay.⁵ But the State fails to identify any harm from allowing the District Court to proceed with a preliminary injunction hearing, let alone the "irreparable harm" required by

⁵ Pursuant to NRAP 27(e), a motion can only be designated as an "emergency" upon a certification that action is needed in less than fourteen days in order to avoid "irreparable harm." Furthermore, the party is required to state the date or event by which action is necessary to avoid that "irreparable harm." Tellingly, the State and its agents have made no effort to do so. Yet again, the State has falsely cried "emergency" where none exists.

NRAP 27(e). All the State can do is cite its desire to evade discovery (Mot. at 7-8), something that this Court has long emphasized does not constitute grounds for a stay. *Hansen*, 116 Nev. at 658, 6 P.3d at 986-87 ("such litigation expenses, while potentially substantial, are neither irreparable nor serious" enough to warrant a stay).

This is particularly true with respect to the State and its records. The State's documents are "public records" that are to be open to public inspection irrespective of any litigation. NRS 239.010; *DR Partners v. Bd. of Cty. Com'rs of Clark Cty.*, 116 Nev. 616, 6 P.3d 465 (2000). There is simply no basis to stay proceedings that will foster the public's overriding interest in transparency by establishing the record from which the truth can be determined. The State and its agents' obvious attempts to suppress transparency, particularly on this important subject, is precisely why a stay should not issue.

B. It is Alvogen that has a Meritorious Position, not the State.

The State's emergency motion pretends as though this case involves "two purely legal issues: (1) whether . . . the District Court has authority to enter a TRO that has the substantive effect of staying an execution; and (2) whether Alvogen . . . ha[s] private causes of action." (Mot. at 2.) Not only is the State wrong on both arguments, but it ignores the District Court's finding that Alvogen is likely to prevail on its replevin claim. The State and its agents do not assert that Alvogen lacks a "private cause of action" for replevin. (Pet. at 40-48.) Hence, the entire premise of

the State's argument – that its Petition addresses the entirety of the District Court's proceedings – is simply wrong.

Tellingly, the State has no serious response to Alvogen's replevin claim, for which the District Court recognized that Alvogen showed a reasonable likelihood of success. (App. Vol. II, 415:9-10.) The District Court determined that the State is not a good faith purchaser under the UCC, which recognizes voidable title for certain categories of purchasers of goods. *See Tempur-Pedic Int'l, Inc. v. Ways to Charity, Inc.*, 2008 WL 343417 at *1-2 (W.D. Ark. Feb. 6, 2008) (A company that purchased products from an intermediary under circumstances suggesting that the intermediary lacked authority to sell them was not a "good faith purchaser" capable of obtaining good title). Alvogen can thus recover its product illegitimately acquired by the State. And, contrary to the State's assertions, it is well settled that the UCC supersedes any common law principals about restrictions on the sale of goods. *See Jonibach Mgmt Trust v. Wartburg Enters., Inc.*, 136 F. Supp. 3d 792, 809 n. 17 (S.D. Tex. 2015) ("The UCC supersedes the common law.").

Nor did the District Court enter a "stay of execution" under NRS 176.415, as the State suggests. Alvogen never sought a stay of execution, and throughout its papers and the TRO hearing reiterated that it takes no position on capital punishment. The litigation, filed in business court, is a business dispute regarding the improper acquisition and misuse of Alvogen's product. This case concerns a company's right

to protect its legitimate business interests from the unauthorized acquisition and unlawful use of its product. (App. Vol. II, 414.)

Neither does the TRO have "the substantive effect of staying an execution." (Mot. at 2.) There is nothing in the TRO stopping any State executions. The State and its agents are enjoined only from using Alvogen's Midazolam, which it acquired through illegitimate means, in executions pending resolution on the merits. The State would not be in contempt were it to carry out Dozier's execution using alternative means, including a protocol that uses the batches of Cisatracurium that the State is concerned may expire. This TRO simply does not offend (let alone implicate) NRS 176.415.

Alvogen also has shown a reasonable probability that it has a right of action under NRS 41.700. That statute's plain language, according a cause of action for any "person" to "recover his or her actual damages" occasioned by a violation, cannot be eroded through the State's resort to legislative history. The State and its agents are wrong to ask this Court to simply bypass the statute's plain language and determine that Alvogen is not within the "zone of interest" of NRS 41.700. *Lexmark Int'l, Inc. v. Static Control Components, Inc.*, 572 U.S. 118, 128, 134 S.Ct. 1377, 1387-88 (2014). "The starting point for determining legislative intent is the statute's plain meaning; when a statute is clear on its face, a court cannot go beyond the statute in determining legislative intent." *State v. Lucero*, 127 Nev. 92, 95, 249 P.3d 1226,

1228 (2011) (internal quotations omitted). Given NRS 41.700's clarity, the State and its agents' argument is ill-founded. Discovery should proceed, as it will both inform the merits and Alvogen's standing as a "person" harmed by State's conduct within the statute's ambit.

IV. COUNTERMOTION TO DISMISS THE WRIT PETITION

Not only is there no basis for a stay, there is no basis for a writ petition. The District Court's preliminary injunction can be expeditiously reviewed on appeal should Alvogen prevail on its motion. NRAP 3A. *Sicor, Inc. v. Sacks*, 127 Nev. 896, 900, 266 P.3d 618, 620 (2011) (citing *Sugarman Co. v. Morse Bros. Machinery & Supply Co.*, 50 Nev. 191, 255 P. 1010 (1927)). The State's attempt to circumvent the ordinary legal process and avoid a more complete record should be rejected as there are plain, speedy, and adequate legal remedies. NRS 34.170; NRS 34.330.

V. CONCLUSION

A stay will only delay getting to a timely resolution. The District Court should be allowed to promptly proceed with resolving the preliminary injunction motion where a full and fair record can be developed and the truth can be determined.

DATED this 13th day of August 2018.

PISANELLI BICE PLLC

By: /s/ Todd L. Bice
James J. Pisanelli, Esq., Bar No. 4027
Todd L. Bice, Esq., Bar No. 4534
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101

Attorneys for Real Party in Interest Alvogen

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of PISANELLI BICE PLLC, and that on this 13th day of August 2018, I electronically filed and served by electronic mail and United States Mail a true and correct copy of the above and foregoing **OPPOSITION TO EMERGENCY MOTION UNDER NRAP 27(E) TO STAY DISTRICT COURT PROCEEDINGS PENDING THIS COURT'S DECISION ON THE PETITION; COUNTERMOTION TO DISMISS THE WRIT PETITION** properly addressed to the following:

Jordan T. Smith, Esq.
Assistant Solicitor General
555 East Washington Avenue, #3900
Las Vegas, Nevada 89101
JSmith@ag.nv.gov

E. Leif Reid, Esq.
Josh M. Reid, Esq.
Kristen L. Martini, Esq.
LEWIS ROCA ROTHGERBER
CHRISTIE LLP
3993 Howard Hughes Parkway, Suite
600
Las Vegas, NV 89169-5996

SERVED VIA HAND-DELIVERY

The Honorable Elizabeth Gonzalez
Eighth Judicial District court, Dept. XI
Regional Justice Center
200 Lewis Avenue
Las Vegas, Nevada 89155

/s/ Kimberly Peets
An employee of PISANELLI BICE PLLC

EXHIBIT A

From: Jordan T. Smith JSmith@ag.nv.gov
Subject: RE: Alvogen v. State
Date: Aug 3, 2018 at 7:10:52 PM
To: Todd Bice tlb@pisanellibice.com
Cc: James Pisanelli jjp@pisanellibice.com,
KENNETH.SCHULER@lw.com,
Michael.Faris@lw.com,
Angela.Walker@lw.com, Emily A. Buchwald
eab@pisanellibice.com, Debra Spinelli
dls@pisanellibice.com, Ann McDermott
AMcDermott@ag.nv.gov

Todd,

I explained to you how the statements in the State's Motion to Expedite are accurate and comport with the documents disclosed in accordance with Judge Wilson's Order.

This issue doesn't appear to have anything to do with real "questions and concerns" and looks like an attempt to manufacture a collateral issue.

Jordan T. Smith
Deputy Solicitor General
OFFICE OF THE ATTORNEY GENERAL
555 E. Washington Ave., Suite 3900
Las Vegas, NV 89101
Phone: [\(702\) 486-3894](tel:7024863894)

-----Original Message-----

From: Todd Bice [mailto:tlb@pisanellibice.com]

Sent: Friday, August 3, 2018 6:12 PM

To: Jordan T. Smith <JSmith@ag.nv.gov>

Cc: James Pisanelli <jjp@pisanellibice.com>;

KENNETH.SCHULER@lw.com; Michael.Faris@lw.com;

Angela.Walker@lw.com; Emily A. Buchwald

<eab@pisanellibice.com>; Debra Spinelli

<dls@pisanellibice.com>

Subject: [BULK] Alvogen v. State

Jordan: Thank you for the prompt call in response to my letter of today. As noted, Alvogen has questions and concerns as to the State's representations to the Supreme Court and thus I want to confirm your explanation in writing.

You stated that the so-called batch of the drug Cisatracurium which expires on November 30, 2018, is not the State's sole

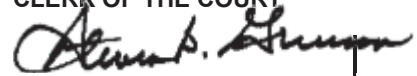
supply of that drug. You acknowledged that the State has other supplies of Cisatracurium that do not have such an expiration date and which do not expire until sometime next year. You also acknowledged that the State has sufficient Cisatracurium to carry out the Dozier execution regardless of the batch that expires on November 30.

If you contend that this does not accurately reflect the facts as to the State's supply of Cisatracurium, please let me know, in writing, promptly.

Thanks.

-- Todd.

EXHIBIT B



TRAN

DISTRICT COURT
CLARK COUNTY, NEVADA
* * * * *

ALVOGEN INC.

Plaintiff

vs.

STATE OF NEVADA, NEVADA
DEPARTMENT OF CORRECTIONS,
et al.

Defendants
.

CASE NO. A-18-777312-B

DEPT. NO. XI

**Transcript of
Proceedings**

BEFORE THE HONORABLE ELIZABETH GONZALEZ, DISTRICT COURT JUDGE

HEARING ON DEFENDANTS' MOTION TO STAY PROCEEDINGS

MONDAY, AUGUST 6, 2018

COURT RECORDER:

JILL HAWKINS
District Court

TRANSCRIPTION BY:

FLORENCE HOYT
Las Vegas, Nevada 89146

Proceedings recorded by audio-visual recording, transcript
produced by transcription service.

APPEARANCES:

FOR THE PLAINTIFF:

TODD L. BICE, ESQ.
JAMES J. PISANELLI, ESQ.
MICHAEL FARIS, ESQ.

FOR THE DEFENDANTS:

JORDAN T. SMITH, ESQ.
RANDALL GILMER, ESQ.

FOR THE INTERVENOR:

JOSH M. REID, ESQ.

ALSO PRESENT:

COLBY WILLIAMS, ESQ.
For Sandoz, Inc.

1 LAS VEGAS, NEVADA, MONDAY, AUGUST 6, 2018, 10:21 A.M.

2 (Court was called to order)

3 THE COURT: Before we start will you please identify
4 yourselves for purposes of my record.

5 MR. BICE: Good morning, Your Honor. Todd Bice on
6 behalf of Alvogen.

7 MR. PISANELLI: 'Morning, Your Honor. James
8 Pisanelli on behalf of Alvogen.

9 MR. REID: Your Honor, Josh Reid representing Hikma
10 Pharmaceuticals USA.

11 MR. WILLIAMS: 'Morning, Your Honor. Colby Williams
12 on behalf of proposed intervenor Sandoz, which I'll bring up
13 with the Court [inaudible].

14 THE COURT: I have your motion in a minute. We'll
15 hit that as my stop.

16 MR. WILLIAMS: Perfect. Thank you.

17 MR. SMITH: Jordan Smith on behalf of defendants.

18 MR. GILMER: And Randall Gilmer on behalf of
19 defendants, Your Honor.

20 THE COURT: All right. I have a media request and
21 order for access to court proceedings from KSNB, which I have
22 signed. I'm giving it back to Mr. Kutinac.

23 I have Sandoz's motion to intervene and order
24 shortening time. Do you have a preference, Mr. Smith, as to
25 when I set this?

1 Supreme Court speaks for itself. The representations are
2 accurate and correct. I've added a verification of that
3 myself. So I stand by that. There's simply no there there,
4 and it's attempt to just drum up another issue for discovery
5 that should wait for the Nevada Supreme Court's decision.

6 THE COURT: So I'm going to deny your request to
7 stay pending the completion of the preliminary injunction
8 hearing.

9 I would be happy to move the preliminary injunction
10 hearing up if you can find a way to get your discovery done
11 more expeditiously, Mr. Smith. All of those people over on
12 the other side are ready to go. They'll do whatever we say.
13 You've told me you need longer.

14 MR. SMITH: And I understand the resources my
15 colleagues on the other side have. But given the claims being
16 made and what I'm able to do, the current schedule is -- the
17 closest that it's going to work -- I would ask Your Honor for
18 at least a five-day temporary stay so I can renew request to
19 the Nevada Supreme Court.

20 THE COURT: No. But you can renew your request to
21 the Supreme Court.

22 So let's go to the countermotion. And their
23 countermotion is then to shorten discovery period so that the
24 discovery that you need to do, that you've told me you need to
25 do is done on a shorter time frame, because the periods are

1 THE COURT: When do you think you got them, Mr.
2 Smith?
3 MR. SMITH: I think I got them the day that I found
4 out they had been served on that Tuesday.
5 THE COURT: Which was last week?
6 MR. SMITH: Yes.
7 MR. BICE: Your Honor, apparently we served them to
8 the court system, but no one from the State is apparently
9 registered, so they didn't know that they were there.
10 THE COURT: Well, you can't serve them if they're
11 not registered. So have you served them now?
12 MR. BICE: We have.
13 THE COURT: Okay. So it will go 20 days from time
14 you were actually served, not when they tried to serve you
15 through an unregistered --
16 MR. SMITH: Understood. Thank you.
17 THE COURT: Okay. Anything else?
18 MR. BICE: No, Your Honor.
19 THE COURT: I will see you guys on Thursday.
20 MR. BICE: Thank you.
21 MR. SMITH: Thank you, Your Honor.
22 THE PROCEEDINGS CONCLUDED AT 10:40 A.M.
23 * * * * *
24
25

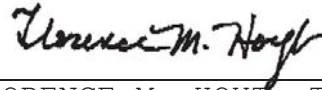
CERTIFICATION

I CERTIFY THAT THE FOREGOING IS A CORRECT TRANSCRIPT FROM THE AUDIO-VISUAL RECORDING OF THE PROCEEDINGS IN THE ABOVE-ENTITLED MATTER.

AFFIRMATION

I AFFIRM THAT THIS TRANSCRIPT DOES NOT CONTAIN THE SOCIAL SECURITY OR TAX IDENTIFICATION NUMBER OF ANY PERSON OR ENTITY.

FLORENCE HOYT
Las Vegas, Nevada 89146



FLORENCE M. HOYT, TRANSCRIBER

8/8/18

DATE