

Kerry S. Doyle, Esq.
Nevada Bar No. 10866
DOYLE LAW OFFICE, PLLC
4600 Kietzke Lane, Ste. I-207
Reno, NV 89502
(775) 525-0889
kerry@rdoylelaw.com

Electronically Filed
Jan 22 2019 02:45 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Attorneys for Appellant

IN THE SUPREME COURT FOR THE STATE OF NEVADA

JEFFREY D. SPENCER,

Appellant,

v.

HELMUT KLEMENTI, EGON
KLEMENTI, ELFRIEDE KLEMENTI,
MARY ELLEN KINION, ROWENA
SHAW, and PETER SHAW,

Respondents.

Case No. 77711

MOTION TO CONSOLIDATE APPEALS

Pursuant to Nevada Rule of Appellate Procedure 3(b), appellant Jeffrey Spencer hereby moves for consolidation of his two appeals from district court case number 14-CV-00269-DC. Spencer's two appeals, the first from the substantive grant of motions for summary judgment and an early award of attorneys' fees (Case No. 77086), the second from a post-judgment award of attorneys' fees (Case No. 77711), arise from the same district court case, are based on the same operative facts, and rely

on the same transcripts. For purposes of judicial economy, Spencer asks that the Court consolidate the two appeals, allowing the filing of a single set of briefs, a single disposition, and easy assignment to the same court.

DATED this 22nd day of January, 2019.

DOYLE LAW OFFICE, PLLC

By: /s/ Kerry S. Doyle
KERRY S. DOYLE, ESQ.
NEVADA BAR NO. 10866
4600 KIETZKE LANE, SUITE I-207
RENO, NEVADA 89502
(775) 525-0889
ATTORNEYS FOR APPELLANT

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Doyle Law Office, PLLC and that on the 22nd day of January, 2019, a true and correct copy of the above **MOTION TO CONSOLIDATE** was e-filed and e-served on all registered parties to the Nevada Supreme Court's electronic filing system as listed below:

Helmut Klementi
Represented by:
Douglas R. Brown
Christian L. Moore
Lemons, Grundy & Eisenberg
6005 Plumas Street, Suite 300
Reno NV 89519

Elfriede Klementi, Mary Ellen Kinion, and the Estate of Egon Klementi,
Represented by
Michael A Pintar
Glogovac & Pintar
427 W. Plumb Lane
Reno NV 89509

Rowena Shaw and Peter Shaw
Represented by:
Tanika M. Capers
American Family Mutual Insurance Company
6750 Via Austi Parkway, Ste. 310
Las Vegas NV 89119

DATED this 22nd day of January, 2019.

 /s/ Gianni Giuliano