

*Steven D. Grierson*

IN THE SUPREME COURT OF THE STATE OF NEVADA

Christopher Davis

Appellant, The BEATRICE B. DAVIS FAMILY  
vs. HERITAGE, dated July 2000,  
Amended on February 24, 2014

Respondent.

*Caroline Davis / Dunham Trust Company*

Supreme Court No. 79080  
District Court No. P-15-083867-T  
P083867

P-15-083867-T

**FILED**

OCT 04 2019

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT  
BY *[Signature]*  
DEPUTY CLERK

**MOTION FOR STAY FORM**  
**FOR PARTIES WITHOUT ATTORNEYS**

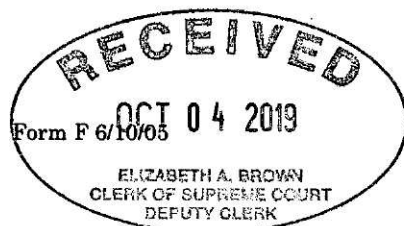
**INSTRUCTIONS:** Write only in the space allowed on the form. **Additional pages and attachments are not permitted.** The Nevada Supreme Court prefers short and direct statements. Citation to legal authority or the district court record is not required but would be helpful to the Court.

Any form you file with the Nevada Supreme Court must be mailed or delivered to all other parties to this appeal or to the parties' attorneys.

You may file your forms in person or by mail. You must file the original and 2 copies with the Clerk of the Nevada Supreme Court. If you want the clerk to return a file-stamped copy of your form, you must submit the original and 3 copies and include a self-addressed, stamped envelope. Documents cannot be faxed or e-mailed to the Clerk's Office.

This form must be filed with the Clerk of the Nevada Supreme Court at the following address:

Clerk of the Court  
Supreme Court of Nevada  
201 South Carson Street  
Carson City, Nevada 89701  
Telephone: (775) 684-1600 or (702) 486-9300



19-41284

de sufficient evidence for their claim that the policy was no

**Judgment or Order You Are Appealing.** Specify the judgment or order that you are appealing from and the date that the judgment or order was filed in the district court.

Filed Date	Name of Judgment or Order
4/26/19	ORDER

**Notice of Appeal.** Specify the date you filed your notice of appeal in the district court: May 28, 2019

**Order to be Stayed.** A stay from the Nevada Supreme Court prevents enforcement of a district court order. What do you want stayed?

The case and order

**Statement of Facts.** Briefly explain the facts related to your request for a stay. (Your answer must be provided in the space allowed.)

We respectfully request a stay in order so the district court cannot make any further  
actions regarding the order filed on April 26, 2019 regarding surrender of the assets  
held by Beatrice B. Davis family Heritage Trust Case No. P15-083867-T until the  
Appellate court has reviewed evidence and made their ruling. This action arose with the  
decisions made to liquidate the Trust April 26, 2019. This Order is an appealable ; the  
petitioner failed to provide sufficient evidence for their claim that the policy was no longer  
sustainable. The petitioner provided nothing from the WRP, the pharmaceutical company  
witch is the largest asset held by the policy. The appellant provided sufficient evidence in  
the form of spreadsheets based on financials provided by the accountant for WARD ROAD  
Pharmacy. The Pharmacy cash flow is more than enough service both the insurance

and the trust companies fees combined. In addition the remaining cash flow is sufficient to provide distributions to the primary beneficiaries. Therefore not only is there no compelling case for liquidation, but also the primary beneficiaries would be deprived from any future income/distributions if the liquidation orders stands

If the liquidation order stands it would be devastating to the primary beneficiary

Christopher Davis, who is disabled and has no other source of income and depends solely on his mother trust.

**Effect on Your Appeal.** If a stay is denied, how will this affect the issues you are appealing? (Your answer must be provided in the space allowed.)

If a stay is denied the trust could be liquidated and the beneficiaries would not be receiving any future distributions. Which would violate the purpose that the BEATRICE B.

DAVIS Heritage Trust was created for.

---

---

---

**Harm to You.** What serious harm will you experience if a stay is denied?  
(Your answer must be provided in the space allowed.)

Denying the stay will violate the whole purpose of the trust/life insurance policy structure

The beneficiaries will have no guaranteed future income.

---

---

---

**Harm to Others.** What harm will the other side experience if the stay is granted? (Your answer must be provided in the space allowed.)

Not only theres no harm but also the other side might benefit from maintaining the original structure as is.

---

---

---

**Success on Appeal.** Why are you likely to win this appeal? (Your answer must be provided in the space allowed.)

We have solid evidence to prove that the insurance policy is sustainable and profitable for all the beneficiaries by its biggest assets WRP.

---

---

---

---

---

---

**CERTIFICATE OF SERVICE**

I certify that on the date indicated below, I served a copy of this completed appeal statement upon all parties to the appeal as follows:

- ☐ By personally serving it upon him/her; or
- ☒ By mailing it by first class mail with sufficient postage prepaid to the following address(es):

DATED this 1 day of August, 2019.



Signature of Moving Party

Christopher Davis

Print Name of Moving Party

2934 1/2 N Beverly Glen Cir #506

Address

Los Angeles, CA 90077

City/State/Zip

213) 248- 2341

Telephone

CERTIFICATE OF SERVICE

I hereby certify that on the 15<sup>th</sup> day of August, 2019, I served a true and correct copy of the foregoing **PETITION FOR MOTION TO STAY**, by the court's electronic filing system to all parties attached to the case and by first class U.S Mail, postage prepaid, to the following persons or entities:

ATTORNEY	PARTY	PHONE/FAX/EMAIL
Mark A. Solomon, Esq. Joshua M. Hood, Esq SOLOMON, DWIGGINS & FREER, LTD. 9060 W. Cheyenne Ave. Las Vegas, NV 89129	Caroline Davis	Phone: (702) 853-5483 Fax: (702) 853-5485  <a href="mailto:msolomon@sdfnlaw.com">msolomon@sdfnlaw.com</a> <a href="mailto:jhood@sdfnlaw.com">jhood@sdfnlaw.com</a>
John M. Tyner, Esq POL SINELLI 900 W. 48th Place, Suite 900 Kansas City, MO 64112	Caroline Davis (MO counsel)	
Thomas Grover, Esq. Michael Olsen, Esq GOODSELL & OLSEN, P.C. 10155 W. Twain Ave., #100 Las Vegas, NV 89147	Christopher Davis	Phone: (702) 869-6261 Fax: (702) 869-8243  <a href="mailto:tom@goodsellolsen.com">tom@goodsellolsen.com</a> <a href="mailto:mike@goodsellolsen.com">mike@goodsellolsen.com</a>
Michael Gallagher, Esq. GALLAGHER & KAISER, LLP 523 Grand Blvd., #1D Kansas City, MO 64106	Counsel for Chris Davis (MO Counsel)	<a href="mailto:mgallagher@gkkclaw.com">mgallagher@gkkclaw.com</a>
Jonathan W. Barlow, Esq. CLEAR COUNSEL LAW GROUP 50 S. Stephanie St., Suite 101 Henderson, NV 89014	Stephen Lehnardt	Phone: (702) 476-5900 Fax: (702) 924-0709  <a href="mailto:jonathan@clearcounsel.com">jonathan@clearcounsel.com</a>
Chris Davis 514 West 26th Street, #3E Kansas City, MO 64108		

1	Tarja Davis		
2	514 West 26th Street, #3E		
3	Kansas City, MO 64108		
4	And		
5	2934 1/2 North Beverly Glen		
6	Cir, Ste. 506		
7	Los Angeles, CA 90077		
8	Winfield B. Davis		<u>winsane@gmail.com</u>
9	909 W Temple Street., Apt 632A		
10	Los Angeles, CA 90012		
11	Harriet H Ronald, Esq.	Christopher Davis	Phone: (702) 452-1500
12	ROLAND FIRM LAW		Fax: (702) 920-8903
13	2470 E. ST. Rose Pkwy., Ste 105		
14	Henderson, NV 89074		<u>hroland@rolandlawfirm.com</u>
15	Anthony Barney, Esq.	Counsel for Chris Davis	Phone: (702) 438-7878
16	ANTHONY L. BARNEY, LTD		Fax: (702) 259-1116
17	3317 W. Charleston Blvd. Ste. B		
18	Las Vegas, NV 89102		<u>abarney@anthonybarney.com</u>

*Milca Moreno*

An employee of Christopher Davis