

Claggett & Sykes Law Firm
Micah S. Echols, Esq.
Nevada Bar No. 8437
4101 Meadows Lane, Suite 100
Las Vegas, Nevada 89107
Telephone: (702) 655-2346
Facsimile: (702) 655-3763
micah@claggettlaw.com
Attorneys for Appellants

Electronically Filed
Feb 26 2020 10:20 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

SUPERPUMPER, INC., an Arizona corporation; EDWARD BAYUK, individually and as Trustee of the EDWARD BAYUK LIVING TRUST; SALVATORE MORABITO, an individual; and SNOWSHOE PETROLEUM, INC., a New York corporation,

Appellants,

v.

WILLIAM A. LEONARD, TRUSTEE FOR THE BANKRUPTCY ESTATE OF PAUL ANTHONY MORABITO,

Respondent.

Case No.: 79355

**REPLY IN SUPPORT OF MOTION
TO STAY BRIEFING, OR
ALTERNATIVELY, MOTION FOR
EXTENSION OF TIME TO FILE
OPENING BRIEF AND APPENDIX**
(First Request)

REPLY IN SUPPORT OF MOTION TO STAY BRIEFING, OR
ALTERNATIVELY, MOTION FOR EXTENSION OF TIME TO FILE
OPENING BRIEF AND APPENDIX
(First Request)

Appellants, Superpumper, Inc.; Edward Bayuk, individually and as Trustee of the Edward Bayuk Living Trust; Salvatore Morabito; and Snowshoe Petroleum, Inc. (“Appellants”), through their attorneys, Claggett & Sykes Law Firm, hereby file this reply in support of their motion to stay briefing, or alternatively, for an extension of time to file their opening brief and appendix pursuant to NRAP 2 and NRAP 31(d).

In their motion, Appellants asked this Court to stay briefing in the instant appeal in order to align and consolidate this case with Case No. 80214. Concurrently with the filing of this reply, Appellants file a reply in Case No. 80214 to confirm the Court’s appellate jurisdiction over that case. Obviously, the resolution of this Court’s appellate jurisdiction is necessary to determine the proper vehicle in which the issues of these cases are presented to the Court. And, consolidation is preferable for the reasons outlined in Appellants’ concurrently-filed motion in Case No. 80214.

Appellants had assumed that they would have all their requested transcripts by the time this appeal is consolidated with Case No. 80214 and an opening brief

and appendix are filed. Even though Appellants filed their request for transcripts in November 2019, they are still waiting for missing transcripts. *See* Notice of Filing Request for Transcripts, filed on November 27, 2019. Although the court reporter has filed some notices with this Court (12/16/19 through 1/16/19), the latest from the court reporter, as of February 25, 2019, is that there are still some missing transcripts. *See Exhibit 1*, email chain from November 26, 2019 through February 25, 2019. The court reporter has delayed over 60 days beyond the presumptive 30-day limit in NRAP 9(c)(1).

Instead of squarely addressing these issues, Respondent/Plaintiff (the “Trustee”) suggests that Appellants have some ulterior motive in seeking a stay of briefing or an extension of time. The Court should disregard the Trustee’s red herring. The proceedings in a separate California court that involve the Trustee’s misdeeds are not before this Court. Rather, the confirmation of the Court’s jurisdiction in Case No. 80214 is before this Court and the consolidation of these two cases. There is simply no reason to duplicate these two appeals when all the issues can be addressed in a single proceeding.

Therefore, the Court should stay the current briefing schedule pending the resolution of the jurisdictional and consolidation issues pursuant to NRAP 2, or alternatively, extend the briefing schedule pursuant to NRAP 31(b) to match the

current April 14, 2020 deadline for Appellants to file their opening brief and appendix in Case No. 80214.

DATED this 26th day of February, 2020.

CLAGGETT & SYKES LAW FIRM

/s/ Micah Echols

By _____

Micah S. Echols, Esq.

Nevada Bar No. 8437

4101 Meadows Lane, Suite 100

Las Vegas, Nevada 89107

Attorneys for Appellants

CERTIFICATE OF SERVICE

I certify that on the 26th day of February, 2020, I served a copy of this **REPLY IN SUPPORT OF MOTION TO STAY BRIEFING, OR ALTERNATIVELY, MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF AND APPENDIX (First Request)** upon all counsel of record:

By electronic service in accordance with this Court's Master Service List

Gabrielle Hamm, Esq.
Michael Lehnert, Esq.
Frank Gilmore, Esq.
Jeffrey Hartman, Esq.
Erika Pike Turner, Esq.
Stephen A. Davis, Esq.
Gerald M. Gordon, Esq.
Teresa M. Pilatowicz, Esq.

By mailing it by first class mail with sufficient postage prepaid to the following address(es):

N/A

/s/ Jocelyn Abrego
Jocelyn Abrego, an employee of
Claggett & Sykes Law Firm

EXHIBIT 1

EXHIBIT 1

Micah Echols

From: Denise Matt <dmatt@litigationsservices.com>
Sent: Tuesday, February 25, 2020 3:37 PM
To: Jocelyn Abrego
Cc: Micah Echols
Subject: RE: Leonard v. Superpumper (CV13-02663) [IWOV-iManage.FID1086745]
Attachments: 1368249.pdf; 051415 SUPERPUMPER.pdf; 051415 SUPERPUMPER.pdf; 511646CA_fulltranscript
indx.pdf

Jocelyn, Sorry for the delay.

7/22/19 Hearing on Exemption

Invoice paid, but transcript not received. I am having the Reporter send this to me again. I will forward it to you once received.

02/08/19 Hearing on Motion to Reopen Evidence

Received, but not invoiced. Invoice posted paid on 2/13

11/26/18 Trial Ongoing – Closing Arguments

Invoice paid, but transcript not received. Transcript attached

9/11/18 Pretrial Conference

No transcript available.

2/24/16 Pre-trial Conference

Received, but not invoiced. Invoice posted paid on 2/13

6/3/15 Hearing on OST-Motion to Continue Trial

Received, but not invoiced. Invoice attached

5/14/15 Pretrial Conference **Transcript attached**

Invoice received and processed for payment, but transcript not received.

Best regards,

Denise Matt

Operations Specialist

151 Country Estates Cr.

Reno, NV 89511

Work: 775-323-3411

Litigationsservices.com | 800-330-1112 | dmatt@litigationsservices.com



151 Country Estates Circle - Reno, Nevada 89511

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material immediately.



Please consider not printing this email. Thanks

From: Jocelyn Abrego <Jocelyn@claggettlaw.com>
Sent: Friday, January 31, 2020 2:22 PM
To: Denise Matt <dmatt@litigationservices.com>
Cc: Micah Echols <Micah@claggettlaw.com>
Subject: RE: Leonard v. Superpumper (CV13-02663) [IWOV-iManage.FID1086745]

Hello Denise,

May you please provide status on the below requests?

Kind regards,
Jocelyn Abrego
Paralegal

Claggett & Sykes Law Firm
4101 Meadows Lane #100
Las Vegas, NV 89107
Tel. 702-655-2346 | Fax 702-655-3763
jocelyn@claggettlaw.com



If you have received this communication in error, please call us immediately at (702) 655-2346 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Finally, if you have received this transmission in error and you have already notified the sender that you received it in error, please delete the email. Thank you. Claggett & Sykes Law Firm.

From: Leah Dell <LDell@maclaw.com>
Sent: Tuesday, January 14, 2020 2:37 PM
To: 'Denise Matt' <dmatt@litigationservices.com>
Cc: Jocelyn Abrego <Jocelyn@claggettlaw.com>; Micah Echols <Micah@claggettlaw.com>
Subject: RE: Leonard v. Superpumper (CV13-02663) [IWOV-iManage.FID1086745]

Thank you, Denise.

Just to recap where we are on all of the transcripts we ordered at the end of November, I am listing our requested transcripts below with the current status:

7/22/19 Hearing on Exemption

Invoice paid, but transcript not received.

02/08/19 Hearing on Motion to Reopen Evidence

Received, but not invoiced.

11/26/18 Trial Ongoing – Closing Arguments

Invoice paid, but transcript not received.

9/11/18 Pretrial Conference

No transcript available.

2/24/16 Pre-trial Conference

Received, but not invoiced.

6/3/15 Hearing on OST-Motion to Continue Trial

Received, but not invoiced.

5/14/15 Pretrial Conference

Invoice received and processed for payment, but transcript not received.

If you can check on the status of the outstanding transcripts, we would very much appreciate it. If you need anything from me to help you track everything down, just let me know. Thanks.



Leah Dell | Paralegal

10001 Park Run Drive

Las Vegas, NV 89145

t | 702.821.2403

f | 702.856.8975

ldell@maclaw.com

maclaw.com



Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Denise Matt <dmatt@litigationservices.com>

Sent: Tuesday, January 14, 2020 2:17 PM

To: Leah Dell <LDell@maclaw.com>; Micah Echols <Micah@claggettlaw.com>

Cc: Jocelyn Abrego <Jocelyn@claggettlaw.com>

Subject: Leonard v. Superpumper (CV13-02663)2-8-19 attached

Here it is!

Best regards,

Denise Matt

Operations Specialist

151 Country Estates Cr.

Reno, NV 89511

Work: 775-323-3411

LitigationServices.com | 800-330-1112 | dmatt@litigationServices.com



151 Country Estates Circle - Reno, Nevada 89511

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material immediately.



Please consider not printing this email. Thanks

From: Denise Matt

Sent: Monday, January 13, 2020 4:09 PM

To: Leah Dell <LDell@maclaw.com>; Micah Echols <Micah@claggettlaw.com>

Cc: Jocelyn Abrego <Jocelyn@claggettlaw.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- 2-24-16 Transcript [IWOV-iManage.FID1086745]

There still is one more outstanding, 2/8/19 I believe. I will ask the Reporter.

Best regards,

Denise Matt

Operations Specialist

151 Country Estates Cr.

Reno, NV 89511

Work: 775-323-3411

LitigationServices.com | 800-330-1112 | dmatt@litigationServices.com



151 Country Estates Circle - Reno, Nevada 89511

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material immediately.



Please consider not printing this email. Thanks

From: Leah Dell <LDell@maclaw.com>

Sent: Monday, January 13, 2020 3:50 PM

To: Denise Matt <dmatt@litigationservices.com>; Micah Echols <Micah@claggettlaw.com>

Cc: Jocelyn Abrego <Jocelyn@claggettlaw.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- 2-24-16 Transcript [IWOV-iManage.FID1086745]

Hi Denise,

We have two transcripts: February 24, 2016 (pre-trial conf) and June 3, 2015 (motion to continue trial). Is there a third one, or is this it for now? Thanks for your help.



Leah Dell | Paralegal

10001 Park Run Drive

Las Vegas, NV 89145

t | 702.821.2403

f | 702.856.8975

ldell@maclaw.com

maclaw.com



Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Denise Matt <dmatt@litigationservices.com>

Sent: Monday, January 13, 2020 3:23 PM

To: Leah Dell <LDell@maclaw.com>; Micah Echols <Micah@claggettlaw.com>

Cc: Jocelyn Abrego <Jocelyn@claggettlaw.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- 2-24-16 Transcript [IWOV-iManage.FID1086745]

This better? 😊

Best regards,

Denise Matt

Operations Specialist

151 Country Estates Cr.

Reno, NV 89511

Work: 775-323-3411

LitigationServices.com | 800-330-1112 | dmatt@litigationServices.com



151 Country Estates Circle - Reno, Nevada 89511

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material immediately.



Please consider not printing this email. Thanks

From: Leah Dell <LDell@maclaw.com>

Sent: Monday, January 13, 2020 3:18 PM

To: Denise Matt <dmatt@litigationServices.com>; Micah Echols <Micah@claggettlaw.com>

Cc: Jocelyn Abrego <Jocelyn@claggettlaw.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- 2-24-16 Transcript [IWOV-iManage.FID1086745]

Hi Denise,

This transcript is from a different case. Did you have another one for Superpumper that is ready? Thanks.



Leah Dell | Paralegal

10001 Park Run Drive

Las Vegas, NV 89145

t | 702.821.2403

f | 702.856.8975

ldell@maclaw.com

maclaw.com



Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Denise Matt <dmatt@litigationservices.com>
Sent: Monday, January 13, 2020 3:14 PM
To: Leah Dell <LDell@maclaw.com>; Micah Echols <Micah@claggettlaw.com>
Cc: Jocelyn Abrego <Jocelyn@claggettlaw.com>
Subject: RE: Leonard v. Superpumper (CV13-02663)- 2-24-16 Transcript

Attached is the final from the Reporter. Thank you.

Best regards,

Denise Matt
Operations Specialist
151 Country Estates Cr.
Reno, NV 89511
Work: 775-323-3411
Litigationservices.com | 800-330-1112 | dmatt@litigationservices.com



151 Country Estates Circle - Reno, Nevada 89511

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material immediately.




Please consider not printing this email. Thanks

From: Leah Dell <LDell@maclaw.com>
Sent: Monday, January 13, 2020 2:42 PM
To: Denise Matt <dmatt@litigationservices.com>; Micah Echols <Micah@claggettlaw.com>
Cc: Jocelyn Abrego <Jocelyn@claggettlaw.com>
Subject: RE: Leonard v. Superpumper (CV13-02663)- 2-24-16 Transcript

Thank you!



Leah Dell | Paralegal
10001 Park Run Drive
Las Vegas, NV 89145
t | 702.821.2403
f | 702.856.8975
ldell@maclaw.com
maclaw.com

 **Please consider the environment before printing this e-mail!**
DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Denise Matt <dmatt@litigationservices.com>
Sent: Monday, January 13, 2020 2:38 PM
To: Micah Echols <Micah@claggettlaw.com>; Leah Dell <LDell@maclaw.com>
Cc: Jocelyn Abrego <Jocelyn@claggettlaw.com>
Subject: RE: Leonard v. Superpumper (CV13-02663)- 2-24-16 Transcript

Leah,
Here is the other one I was waiting for from the same Reporter.

Best regards,

Denise Matt
Operations Specialist
151 Country Estates Cr.
Reno, NV 89511
Work: 775-323-3411
Litigationservices.com | 800-330-1112 | dmatt@litigationservices.com



151 Country Estates Circle - Reno, Nevada 89511

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material immediately.



Please consider not printing this email. Thanks

From: Micah Echols <Micah@claggettlaw.com>
Sent: Monday, January 13, 2020 1:44 PM
To: Leah Dell <LDell@maclaw.com>; Denise Matt <dmatt@litigationservices.com>

Cc: Jocelyn Abrego <Jocelyn@claggettlaw.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

If we have electronic copies, we do not need hard copies. Thanks.

Micah S. Echols, Esq.
Partner

CLAGGETT & SYKES LAW FIRM
4101 Meadows Lane #100
Las Vegas, NV 89107
Tel. 702-655-2346 Fax 702-655-3763
micah@claggettlaw.com
www.claggettlaw.com



NOTICE: If you have received this communication in error, please call us immediately at (702) 655-2346 and ask to speak to the sender of the communication. Also, please email the sender and notify the sender immediately that you received the communication in error. Finally, if you received this communication in error and you have already notified the sender that you received it in error, please delete the email.

From: Leah Dell <LDell@maclaw.com>

Sent: Monday, January 13, 2020 12:13 PM

To: 'Denise Matt' <dmatt@litigationervices.com>

Cc: Micah Echols <Micah@claggettlaw.com>; Jocelyn Abrego <Jocelyn@claggettlaw.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Thank you, Denise. It looks like another one was just filed today. Can you send that one when you get a copy?

Micah, do you want hard copies sent?



Leah Dell | Paralegal
10001 Park Run Drive
Las Vegas, NV 89145
t | 702.821.2403
f | 702.856.8975
ldell@maclaw.com
maclaw.com



Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the

From: Denise Matt <dmatt@litigationservices.com>

Sent: Monday, January 13, 2020 12:05 PM

To: Leah Dell <LDell@maclaw.com>

Cc: 'Micah Echols' <Micah@claggettlaw.com>; 'Jocelyn Abrego' <Jocelyn@claggettlaw.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Hi Leah,

Mia is off on Maternity leave so I am filling in for her. I received the transcript from the Reporter and attached it in this email, she still has one to complete. I will send the hard copies if needed, just let me know. Thank you.

Best regards,

Denise Matt

Operations Specialist

151 Country Estates Cr.

Reno, NV 89511

Work: 775-323-3411

Litigationservices.com | 800-330-1112 | dmatt@litigationservices.com



151 Country Estates Circle - Reno, Nevada 89511

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material immediately.



Please consider not printing this email. Thanks

From: Leah Dell <LDell@maclaw.com>

Sent: Monday, January 13, 2020 11:19 AM

To: Mia Omler <momler@litigationservices.com>

Cc: 'Micah Echols' <Micah@claggettlaw.com>; 'Jocelyn Abrego' <Jocelyn@claggettlaw.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Hi Mia,

We were having issues with our email last week, and I wanted to be sure you received my request below regarding mailed transcripts. We are unable to download anything from the Court, and we have notice that one of the transcripts is complete and has been filed with the Court (see last email in string below).

In addition, Micah has changed firms, and I have copied him and his assistant, Jocelyn, on this email to help facilitate handling of our transcript requests in the above-referenced case.

Please reply all, so that everyone is in the loop.

Thank you,



Leah Dell | Paralegal

10001 Park Run Drive
Las Vegas, NV 89145

t | 702.821.2403

f | 702.856.8975

ldell@maclaw.com

maclaw.com



Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Leah Dell

Sent: Friday, January 10, 2020 12:42 PM

To: 'Mia Omler' <momler@litigationservices.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Good afternoon,

We show a transcript was filed today in the Washoe Court, but we can't download it or see it. Will we be receiving emailed copies or mailed copies? This is the first transcript we have seen come through so far from our requests. Thanks.



Leah Dell | Paralegal

10001 Park Run Drive
Las Vegas, NV 89145

t | 702.821.2403

f | 702.856.8975

ldell@maclaw.com

maclaw.com



Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Mia Omler <momler@litigationservices.com>

Sent: Monday, December 9, 2019 12:19 PM

To: Leah Dell <LDell@maclaw.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Yep-I just texted Erin. I will let you know what she says

Regards,

Mia Omler

151 Country Estates Circle

Reno, NV 89511

Work: 775-323-3411

Litigationservices.com | 800-330-1112 | momler@litigationservices.com



151 Country Estates Circle - Reno, Nevada 89511

From: Leah Dell [<mailto:LDell@maclaw.com>]

Sent: Monday, December 09, 2019 12:07 PM

To: Mia Omler <momler@litigationservices.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

I contacted the Dept. 1 clerk, and she said I would have to order directly from you. She indicated the reporter that day was Erin Ferretto. Does that help you?



Leah Dell | Paralegal

10001 Park Run Drive

Las Vegas, NV 89145

t | 702.821.2403

f | 702.856.8975

ldell@maclaw.com

maclaw.com



Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Mia Omler <momler@litigationservices.com>

Sent: Monday, December 9, 2019 11:14 AM

To: Leah Dell <LDell@maclaw.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

For the 2/24/16 date, since in my system it is showing we were not in Dept 1 that day, it must've been another day. If you call the Dept 1 clerk, she should be able to help.

For 06/03/15 date, reporter just got back to me and it is showing that hearing was heard, so I will send request to her ☺

Thank you!

Regards,

Mia Omler

151 Country Estates Circle

Reno, NV 89511

Work: 775-323-3411

Litigationservices.com | 800-330-1112 | momler@litigationservices.com



151 Country Estates Circle - Reno, Nevada 89511

From: Leah Dell [<mailto:LDell@maclaw.com>]

Sent: Monday, December 09, 2019 11:04 AM

To: Mia Omler <momler@litigationservices.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Good morning,

Just to clarify what is available and what I might need to do from here:

For 2/24/16, does that mean there was no transcript? Or, do I need to speak with someone else?

For 6/3/15, please let me know if a transcript is available or who I might need to talk to.

For 9/11/18, I will note that there is no transcript.

Thank you,



Leah Dell | Paralegal

10001 Park Run Drive

Las Vegas, NV 89145

t | 702.821.2403

f | 702.856.8975

ldell@maclaw.com

maclaw.com



Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Mia Omler <momler@litigationservices.com>

Sent: Monday, December 9, 2019 10:37 AM

To: Leah Dell <LDell@maclaw.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Leah,

It has come to my attention that the 02/24/16 Pretrial Conference & 06/03/15 Hearing on OST was heard in Department 1 and not Department 4. Although we did cover Department 1 for those dates, I am not showing we were in Department 1 for the 02/24/16 one that is being requested.

For the 06/03/15 date, it does show we were in Department 1 that day, but only that we covered a different case for that day. I can double check with the reporter that was there, though.

This is another e-mail from the reporter on the 09/11/18 date being requested. "Hi there: I checked my notes and disk for 9-11-18 and while I had a very long crim calendar and a fairly long afternoon criminal hearing I had no hearing in the above case which indicates they did not want a reporter."

Thank you.

Regards,

Mia Omler

151 Country Estates Circle

Reno, NV 89511

Work: 775-323-3411

Litigationservices.com | 800-330-1112 | momler@litigationservices.com



151 Country Estates Circle - Reno, Nevada 89511

From: Leah Dell [<mailto:LDell@maclaw.com>]
Sent: Monday, December 02, 2019 1:35 PM
To: Mia Omler <momler@litigationservices.com>
Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Ok. Got it. Thank you.



Leah Dell | Paralegal
10001 Park Run Drive
Las Vegas, NV 89145
t | 702.821.2403
f | 702.856.8975
ldell@maclaw.com
maclaw.com

 **Please consider the environment before printing this e-mail!**

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Mia Omler [<mailto:momler@litigationservices.com>]
Sent: Monday, December 2, 2019 1:35 PM
To: Leah Dell
Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

You are charged for the 3 copies that are required for your appeal ☺

Okay, I will send a PDF when they are turned in!

Regards,

Mia Omler
151 Country Estates Circle
Reno, NV 89511
Work: 775-323-3411
Litigationservices.com | 800-330-1112 | momler@litigationservices.com




151 Country Estates Circle - Reno, Nevada 89511

From: Leah Dell [<mailto:LDell@maclaw.com>]
Sent: Monday, December 02, 2019 1:32 PM
To: Mia Omler <momler@litigationservices.com>
Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Are we charged additional copy costs for those three copies? They actually aren't necessary. An emailed copy is sufficient for us and for the appendix to the Supreme Court.



Leah Dell | Paralegal
10001 Park Run Drive
Las Vegas, NV 89145
t | 702.821.2403
f | 702.856.8975
ldell@maclaw.com
maclaw.com

 **Please consider the environment before printing this e-mail!**
DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Mia Omler [<mailto:momler@litigationservices.com>]
Sent: Monday, December 2, 2019 1:30 PM
To: Leah Dell
Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

We file the original with the court and provide three copies to you for distribution ☺

Regards,

Mia Omler
151 Country Estates Circle
Reno, NV 89511
Work: 775-323-3411
Litigationservices.com | 800-330-1112 | momler@litigationservices.com



151 Country Estates Circle - Reno, Nevada 89511

From: Leah Dell [<mailto:LDell@maclaw.com>]

Sent: Monday, December 02, 2019 1:28 PM

To: Mia Omler <momler@litigationsservices.com>; Reno Reception <renoreception@litigationsservices.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

That is per the rule, yes. Most reporters provide service of one file-stamped copy. Are you going to provide multiple certified copies in paper?



Leah Dell | Paralegal

10001 Park Run Drive

Las Vegas, NV 89145

t | 702.821.2403

f | 702.856.8975

ldell@maclaw.com

maclaw.com



Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Mia Omler [<mailto:momler@litigationsservices.com>]

Sent: Monday, December 2, 2019 1:23 PM

To: Leah Dell; Reno Reception

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Leah,

I don't think I mentioned this, but per appellate procedure, three copies of transcripts are required.

Regards,

Mia Omler

151 Country Estates Circle

Reno, NV 89511

Work: 775-323-3411




151 Country Estates Circle - Reno, Nevada 89511

From: Leah Dell [<mailto:LDell@maclaw.com>]
Sent: Monday, December 02, 2019 1:04 PM
To: Mia Omler <momler@litigationServices.com>; Reno Reception <renoreception@litigationServices.com>
Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Yes. We have the other days already. Thanks.



Leah Dell | Paralegal
10001 Park Run Drive
Las Vegas, NV 89145
t | 702.821.2403
f | 702.856.8975
ldell@maclaw.com
maclaw.com

 **Please consider the environment before printing this e-mail!**
DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Mia Omler [<mailto:momler@litigationServices.com>]
Sent: Monday, December 2, 2019 12:18 PM
To: Leah Dell; Reno Reception
Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Thank you, Leah!

I'd also just like to confirm you're only looking for the one trial date.

Regards,

Mia Omler
151 Country Estates Circle
Reno, NV 89511

Work: 775-323-3411

LitigationServices.com | 800-330-1112 | momler@litigationServices.com



151 Country Estates Circle - Reno, Nevada 89511

From: Leah Dell [<mailto:LDell@maclaw.com>]

Sent: Wednesday, November 27, 2019 1:33 PM

To: Mia Omler <momler@litigationServices.com>; Reno Reception <renoreception@litigationServices.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Here is the official request that was filed this morning. I look forward to working with you.

Happy Thanksgiving!



Leah Dell | Paralegal

10001 Park Run Drive
Las Vegas, NV 89145

t | 702.821.2403

f | 702.856.8975

ldell@maclaw.com

maclaw.com



Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Mia Omler [<mailto:momler@litigationServices.com>]

Sent: Tuesday, November 26, 2019 3:34 PM

To: Leah Dell; Reno Reception

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

That sounds good. Thank you, Leah!

Regards,

Mia Omler

151 Country Estates Circle

Reno, NV 89511

Work: 775-323-3411

LitigationServices.com | 800-330-1112 | momler@litigationServices.com



151 Country Estates Circle - Reno, Nevada 89511

From: Leah Dell [<mailto:LDell@maclaw.com>]

Sent: Tuesday, November 26, 2019 3:28 PM

To: Mia Omler <momler@litigationServices.com>; Reno Reception <renoreception@litigationServices.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

I should be able to get you the filed transcript request tomorrow. I just have to get it approved by my attorney who is out of the office. Thanks.



Leah Dell | Paralegal

10001 Park Run Drive

Las Vegas, NV 89145

t | 702.821.2403

f | 702.856.8975

ldell@maclaw.com

maclaw.com



Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Mia Omler [<mailto:momler@litigationServices.com>]

Sent: Tuesday, November 26, 2019 3:27 PM

To: Leah Dell; Reno Reception

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Okay, got it!

Yep, on the Washoe Courts website it says heard in JAVS courtroom

Regards,

Mia Omler
151 Country Estates Circle
Reno, NV 89511
Work: 775-323-3411
Litigationservices.com | 800-330-1112 | momler@litigationservices.com



151 Country Estates Circle - Reno, Nevada 89511

From: Leah Dell [<mailto:LDell@maclaw.com>]
Sent: Tuesday, November 26, 2019 3:10 PM
To: Mia Omler <momler@litigationservices.com>; Reno Reception <renoreception@litigationservices.com>
Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]


Thank you for the information below. That helps a lot.

For the May 20 and 21, 2015 transcripts, I just spoke with the Court Clerk, and the transcripts appear to be duplicate filings regarding the May 14, 2015 pretrial conference. So, really only one transcript there.

Were both 01/19/17 hearings in the JAVS courtroom?



Leah Dell | Paralegal
10001 Park Run Drive
Las Vegas, NV 89145
t | 702.821.2403
f | 702.856.8975
ldell@maclaw.com
maclaw.com

 **Please consider the environment before printing this e-mail!**
DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Mia Omler [<mailto:momler@litigationservices.com>]
Sent: Tuesday, November 26, 2019 2:54 PM
To: Leah Dell; Reno Reception
Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Absolutely!

Just took a look at the dates:

2/8/19-We were in Dept 4 that day but that transcript is not transcribed.

11/26/18-Only closing arguments were requested by counsel at the time. Is this the only trial date you're looking for?

12/19/17-Was heard in a JAVS courtroom, so we would not have it.

8/10/17-Was heard in a JAVS courtroom, so we would not have it.

1/19/17-Was heard in a JAVS courtroom, so we would not have it.

02/24/16, 06/03/15, and the other ones you asked about I will have to ask the reporters for directly as this was Molezzo Reporters' court up until October of 2016 when they merged with us.

Please let me know which dates you're referring to for the pre-trial conferences. I don't have a way of seeing which dates were filed.

Thank you!

Regards,

Mia Omler

151 Country Estates Circle

Reno, NV 89511

Work: 775-323-3411

LitigationServices.com | 800-330-1112 | momler@litigationServices.com



151 Country Estates Circle - Reno, Nevada 89511

From: Leah Dell [<mailto:LDell@maclaw.com>]

Sent: Tuesday, November 26, 2019 2:43 PM

To: Mia Omler <momler@litigationServices.com>; Reno Reception <renoreception@litigationServices.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Thank you. I appreciate your help. I just don't want to make an official request for a transcript that doesn't exist.



Leah Dell | Paralegal

10001 Park Run Drive

Las Vegas, NV 89145

t | 702.821.2403

f | 702.856.8975

ldell@maclaw.com

maclaw.com



Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Mia Omler [<mailto:momler@litigationservices.com>]

Sent: Tuesday, November 26, 2019 2:30 PM

To: Leah Dell; Reno Reception

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

I will look into this and be back to you in a bit. Thank you.

Regards,

Mia Omler

151 Country Estates Circle

Reno, NV 89511

Work: 775-323-3411

Litigationservices.com | 800-330-1112 | momler@litigationservices.com



151 Country Estates Circle - Reno, Nevada 89511

From: Leah Dell [<mailto:LDell@maclaw.com>]

Sent: Tuesday, November 26, 2019 2:15 PM

To: Mia Omler <momler@litigationservices.com>; Reno Reception <renoreception@litigationservices.com>

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

We normally wait to get that on file until we know there are official transcripts available for all of the hearings. Do you have any way to check that beforehand? Thanks.



Leah Dell | Paralegal

10001 Park Run Drive

Las Vegas, NV 89145

t | 702.821.2403

f | 702.856.8975

ldell@maclaw.com

maclaw.com



Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: Mia Omler [<mailto:momler@litigationervices.com>]

Sent: Tuesday, November 26, 2019 2:08 PM

To: Leah Dell; Reno Reception

Subject: RE: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Hello Leah,

I will send this request to the reporter. Can you please send us the official file-stamped request for transcripts?

I might not hear from the reporter(s) until later in the week or early next week due to the holiday for the page counts so I can get you a cost. Thank you.

Regards,

Mia Omler

151 Country Estates Circle

Reno, NV 89511

Work: 775-323-3411

Litigationervices.com | 800-330-1112 | momler@litigationervices.com



151 Country Estates Circle - Reno, Nevada 89511

From: Leah Dell [<mailto:LDell@maclaw.com>]

Sent: Tuesday, November 26, 2019 2:00 PM

To: Reno Reception <renoreception@litigationservices.com>

Subject: Leonard v. Superpumper (CV13-02663)- Transcript Requests (15765-001) [IWOV-iManage.FID1086745]

Good afternoon,

I am seeking a number of transcripts from a Judge Steinheimer case in Department 4 of the Second Judicial Court (*Leonard v. Superpumper* CV13-02663). The Court website has you listed as the Court Reporter.

This case is on appeal, and I need the following transcripts:

02/08/19	Hearing on Motion to Reopen Evidence
11/26/18	Trial-Ongoing
12/19/17	Discovery Hearing on Sanctions
08/10/17	Discovery Hearing on Motion to Quash Subpoena or Protective Order, etc.
01/19/17 4:45 pm	Discovery Hearing- Bayuk Deposition on Insurance Policies
01/19/17 3:00 pm	Order to Show Cause
02/24/16	Pre-trial Conference
06/03/15	Hearing on OST

Also, pre-trial conference transcripts were filed on 05/20/15 and 05/21/15. Can you tell me if these are available at copy rates or otherwise?

We need an estimate and deposit amounts, please. If you have any questions, please give me a call to discuss at 702-821-2403.

Thank you for your assistance.



Leah Dell | Paralegal

10001 Park Run Drive

Las Vegas, NV 89145

t | 702.821.2403

f | 702.856.8975

ldell@maclaw.com

maclaw.com



Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law