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BRUCE R. WILLIAMS

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Dec 24 2019 01:13 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO.: 11-CV-0296

DEPT. NO.: II

This document does not contain personal information of any person.

THE NINTH JUDICIAL DISTRICT COURT OF NEVADA

IN AND FOR THE COUNTY OF DOUGLAS

PEGGY CAIN, an individual; JEFFREY CAIN, an individual; and HELI OPS INTERNATIONAL, LLC, an Oregon limited liability company,

Plaintiffs,

v.

D.R. RAWSON, an individual; C4 WORLDWIDE, INC., a Nevada corporation; RICHARD PRICE, an individual; JOE BAKER, an individual; MICKEY SHACKELFORD, an individual; MICHAEL K. KAVANAGH, an individual; and JEFFREY EDWARDS, an individual,

Defendants.

NOTICE OF CROSS-APPEAL

MATUSKA LAW OFFICES, LTD.
2310 South Carson Street, Suite 6
Carson City NV 89701
(775) 350-7220

NOTICE IS HEREBY GIVEN THAT Plaintiffs, PEGGY CAIN, JEFFREY CAIN, and HELI OPS INTERNATIONAL, LLC, (hereinafter collectively referred to as "the Cains") appeal to the Nevada Supreme Court from the following Orders:

1. *Order Determining Amount of Attorney's Fees to be Paid by Plaintiff's and Directing Payment Thereof* entered on November 1, 2019, a copy of which is attached hereto as **Ex. "1"**;

2. *Order Denying Plaintiffs' Motion for Extension of Time* entered on July 17, 2019, a copy of which is attached hereto as **Ex. "2"**; and

3. *Order Denying Motion for Attorney Fees* entered on June 18, 2018, a copy of which is attached hereto as **Ex. "3"**.

Docket 80273 Document 2019-52062

Dated this 13 day of December, 2019.

MATUSKA LAW OFFICES, LTD.

By:

MICHAEL L. MATUSKA, SBN 5711
2310 South Carson Street, Suite 6
Carson City, NV 89701
Attorneys for Plaintiffs

MATUSKA LAW OFFICES, LTD.
2310 South Carson Street, Suite 6
Carson City NV 89701
(775) 350-7220

MATUSKA LAW OFFICES, LTD.
2310 South Carson Street, Suite 6
Carson City NV 89701
(775) 350-7220

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of Matuska Law Offices, Ltd., and that on the 13 day of December, 2019, I served a true and correct copy of the preceding document entitled **NOTICE OF CROSS-APPEAL** as follows

Mark Forsberg, Esq.
Oshinski & Forsberg, Ltd.
504 East Musser Street, Suite 202
Carson City NV 89701

Attorneys for Defendants Richard Price and
Mickey Shackelford

[X] **BY U.S. MAIL:** I deposited for mailing in the United States mail, with postage fully prepaid, an envelope containing the above-identified document(s) at Carson City, Nevada, in the ordinary course of business.

[ ] **BY EMAIL ONLY:**

[ ] **BY PERSONAL SERVICE:** I personally delivered the above-identified document(s) by hand delivery to the office(s) of the person(s) named above.

[ ] **BY FACSIMILE:**

[ ] **BY FEDERAL EXPRESS ONE-DAY DELIVERY**.

[ ] **BY MESSENGER SERVICE:** I delivered the above-identified document(s) to Reno-Carson Messenger Service for delivery.

Suzette Turley

SUZETTE TURLEY

I:\Client Files\Litigation\Heli Ops\v. Rawson\Pldgs\Notice of Cross-Appeal.doc

Exhibit Index

NOTIICE OF CROSS-APPEAL

EXHIBIT	DOCUMENT	NO. OF PAGES
1	Order Determining Amount of Attorney's Fees to be Paid by Plaintiffs and Directing Payment Thereof	3
2	Order Denying Plaintiffs' Motion For Extension of Time	6
3	Order Denying Motion for Attorney Fees	4

Exhibit 1

ORDER DETERMINING AMOUNT OF ATTORNEY'S FEES TO BE PAID BY PLAINTIFFS AND DIRECTING PAYMENT THEREOF

(Notice of Cross-Appeal)

Exhibit 1

ORDER DETERMINING AMOUNT OF ATTORNEY'S FEES TO BE PAID BY PLAINTIFFS AND DIRECTING PAYMENT THEREOF

(Notice of Cross-Appeal)

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ROBERT WILLIAMS
CLERK
A. NEWTON
DEPUTY

Case No. 11-CV-0296

Dept. No. II

IN THE NINTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF DOUGLAS

PEGGY CAIN, an individual; JEFFREY CAIN, an individual; and HELI OPS INTERNATIONAL, LLC, and Oregon limited liability company,

Plaintiffs,

vs.

D.R. RAWSON, an individual; C4 WORLDWIDE, INC., a Nevada corporation; RICHARD PRICE, an individual; JOE BAKER, an individual; MICKEY SHACKELFORD, an individual; MICHAEL K. KAVANAGH, an individual; JEFFREY EDWARDS, an individual; and DOES 1 through 10, inclusive,

Defendants.

ORDER DETERMINING AMOUNT OF ATTORNEY'S FEES TO BE PAID BY PLAINTIFFS AND DIRECTING PAYMENT THEREOF

On July 17, 2019, the Court entered an *Order Denying Plaintiffs' Motion for Extension of Time*. The Court awarded Defendants Price and Shackelford reasonable attorney's fees, as a sanction, for their efforts in opposition the motion. *Id.* at p. 5. The Courts findings are not repeated herein.

Defendants were ordered to file and serve documentation in support of the amount of fees requested. *Id.* Defendants did so in a brief styled *Motion for Attorney's Fees as a Sanction (NRCP*

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

11). Plaintiffs filed an opposition and Defendants filed a reply.

Defendants support the amount of fees requested by affidavit and billing statements. Plaintiffs submit that some of the billing entries were for efforts unrelated to Defendants' opposition to the motion in question. Defendants reply that to the extent time spent by counsel was tangentially related, the attorney's fees are justified as a fine.

The Court has considered the factors supplied by *Brunzell v. Golden Gate Nat'l Bank*, 85 Nev. 345, 349 (1969) in evaluating the amount of fees requested by Defendants. Counsel for Defendants advocated against the underlying motion by filing a seven-page opposition together with an affidavit of counsel. Counsel's efforts were of sufficient character and quality to successfully defeat the motion. Some of the billed time was, however, only tangentially related to opposing the motion. Defendants did not request a fine and a fine was not assessed by the Court.

The Court finds that billing entries for 6/5/2019, 6/10/2019, 6/11/2019 and 7/18/2019, for both Defendants Price and Shackelford, best exemplify the time directly spent on opposing the motion. The amount of time was reasonable as was the hourly rate given the qualifications and experience of counsel.

Good cause appearing,

IT IS HEREBY ORDERED that the amount of attorney's fees payable by Plaintiffs to Defendants Price and Shackelford is set at $2,100.00. Plaintiffs shall remit said amount to counsel for Defendants Price and Shackelford by November 18, 2019, at 1:30 p.m.

///

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
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IT IS FURTHER ORDERED that Plaintiffs shall appear before the Court for a status hearing on November 18, 2019, at 1:30 p.m. If, prior to the hearing, Plaintiffs comply with this order and file proof of the same with the Court, the hearing will be vacated.

DATED this 1st day of ~~October~~ November, 2019.

THOMAS W. GREGORY
DISTRICT JUDGE

Copies served by mail on ~~October~~ November 1, 2019, addressed to:

Michael Matuska, Esq.
2310 South Carson Street, #6
Carson City, Nevada 89701

Mark Forsberg, Esq.
504 E. Musser Street, Suite 202
Carson City, Nevada 89701

Andrea Dominguez for
Erin C. Plante

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

Exhibit 2

ORDER DENYING PLAINTIFFS' MOTION FOR EXTENSION OF TIME

(Notice of Cross-Appeal)

Exhibit 2

ORDER DENYING PLAINTIFFS' MOTION FOR EXTENSION OF TIME

(Notice of Cross-Appeal)

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JUL 17 2019
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FILED
2019 JUL 17 PM 3:16
DOROTHY A. WILLIAMS
CLERK
M. BIAGGINI DEPUTY

Case No. 11-CV-0296

Dept. No. II

IN THE NINTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF DOUGLAS

PEGGY CAIN, an individual; JEFFREY CAIN, an individual; and HELI OPS INTERNATIONAL, LLC, and Oregon limited liability company,

Plaintiffs,

vs.

D.R. RAWSON, an individual; C4 WORLDWIDE, INC., a Nevada corporation; RICHARD PRICE, an individual; JOE BAKER, an individual; MICKEY SHACKELFORD, an individual; MICHAEL K. KAVANAGH, an individual; JEFFREY EDWARDS, an individual; and DOES 1 through 10, inclusive,

Defendants.

_____/

ORDER DENYING PLAINTIFFS' MOTION FOR EXTENSION OF TIME

THIS MATTER comes before the Court on Plaintiffs' *Motion for Extension of Time*, filed May 30, 2019. The motion has been fully briefed and is ripe for consideration. Good cause appearing, the Court finds and orders as follows:

Procedural and Factual History

On September 24, 2014, the Court issued a *Scheduling* Order designating July 17, 2015 as the discovery deadline. The Scheduling Order provides, "**No extensions or modifications shall**

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

be permitted, except by Order of the Court. NRCP 16(b)(3)." *Id.* at p. 3 (no emphasis added).

On December 26, 2014, Plaintiffs requested that Defendants Price and Shackelford produce "any and all Form W2s, Form 1099's and any and all personal tax returns for tax years 2009 and 2010." Price and Shackelford objected. Plaintiffs brought a motion to compel. The motion was denied. Plaintiffs successfully appealed. Remittitur issued on May 7, 2018. Post-appeal, Price and Shackelford produced their 2009 and 2010 tax returns.

On April 26, 2019, Plaintiffs propounded a discovery request on Price and Shackelford to "provide any and all Form W2s, Form 1099s and any and all personal tax returns for tax years 2011 to the present." On or about May 28, 2019, counsel for Defendants Price and Shackelford conferred with counsel for Plaintiffs and voiced an objection.

On May 30, 2019, Plaintiffs filed the pending *Motion for Extension of Time*. Plaintiffs "move pursuant to DCR 17 and NJDCR 10 for an extension of time to allow the additional discovery permitted by *Cain v. Price*, 134 Nev.Adv.Op. 26 (April 12, 2018). Plaintiffs attached as exhibits the April 26, 2019 requests for production noted above. Citing NRCP 26(e), Plaintiffs also claim Defendants have a duty to provide the documentation as a supplement to documents already provided in reference to 2009 and 2010 taxes.

Defendants Price and Shackelford argue that DCR 17 and NJDCR 10 are inapplicable; they have fully complied with the order of the Nevada Supreme Court by producing their 2009 and 2010 tax information; their tax information from 2011 onward should be

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

protected; that NRCP 26(e) does not require them to supplement the previously provided 2009 and 2010 tax information with tax information for 2011 onward; for an award of attorney's fees; and for enforcement of the Court's July 1, 2016 order imposing sanctions on Plaintiffs.

Discussion

The authorities relied upon by Plaintiffs, DCR 17 and NJDCR 10, are plainly inapplicable to Plaintiffs request for an extension of time to allow additional discovery. Plaintiffs' motion stands to be denied on this basis alone.

Although not cited by Plaintiffs, the Court has considered whether Plaintiffs have demonstrated good cause to extend the discovery deadline pursuant to NRCP 16(b)(4). In 2014, Plaintiffs specifically requested tax information for the years 2009 and 2010. Plaintiffs did not ask for tax information for any other year, including 2011-2014, or even 2009 "to present". Plaintiffs did not move for modification of the *Scheduling Order* prior to the discovery deadline and do not state good cause, let alone any cause, as to why they failed to do so. Plaintiffs waited until May 30, 2019 to request an extension. Plaintiffs' request comes grossly after the close of discovery and one year after remittitur. Inexplicably, Plaintiffs served Defendants with the extremely delinquent additional discovery request without court authorization and before they even filed the motion seeking an extension. Plaintiffs conduct is in direct violation of NRCP 16 and the *Scheduling Order*. Plaintiffs have not demonstrated good cause to extend the discovery deadline. In accord, the post-discovery deadline requests propounded by Plaintiffs, as

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
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MINDEN, NV 89423

reflected in the exhibits to the motion, were improperly served and are ineffectual.

After framing their request for Defendants' 2011 to present tax information as additional discovery, for which they seek an extension of the discovery deadline, Plaintiffs pivot and argue that Defendants are required to provide the documentation pursuant to NRCP 26(e) as being supplemental to the 2009 and 2010 tax documents already provided. Plaintiffs do not claim that the produced 2009 and 2010 tax documents are incomplete or incorrect. NRCP 26(e). Plaintiffs do not state how a specific request for 2009 and 2010 tax documents, made in 2014, requires Defendants to produce their tax information for 2011-present. NRCP 26(e) is inapplicable.

The Nevada Supreme Court held that Defendants are compelled to produce their 2009-2010 tax information in response to Plaintiffs specific and timely request. Defendants have complied. The Nevada Supreme Court did not order an extension of the discovery deadline or order Defendants to produce 2011-present tax documentation. The Nevada Supreme Court did not give Plaintiffs *carte blanche* to violate court rules and procedure and their affirmance of the July 1, 2016 *Order Granting Attorney's Fees as a Sanction (NRCP 11)*, strongly suggests otherwise. Therein, Plaintiffs were ordered to pay Defendants Price and Shackelford $9,514.00 within 30 days. Three years later, and one year post-remittitur, Plaintiffs have yet to pay.

There are multiple authorities warranting another monetary sanction against Plaintiffs. These include NRCP 26, NRCP 16, NJDCR 23, NRCP 16(f)(1)(C), NRCP 37, NRCP 11 and NRS 7.085. By

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

propounding an extremely tardy and over burdensome discovery request for personal information and subsequently bringing a frivolous motion to extend the discovery deadline, Plaintiffs have demonstrated an improper purpose. The Court is concerned that prior monetary sanctions have not been paid and have not been effective in deterring Plaintiffs' disregard for court rules and procedure. Further violations may be met with sanctions beyond monetary sanctions, such as those provided in NRCP 37(b)(1).

IT IS HEREBY ORDERED that Plaintiffs' *Motion for Extension of Time* is **DENIED**.

IT IS FURTHER ORDERED that Defendants are awarded reasonable attorney's fees for their efforts to oppose the motion. Defendants shall file and serve documentation in support of the amount of fees requested within 10 judicial days of this order.

IT IS FURTHER ORDERED that Plaintiffs shall appear before the Court on July 29, 2019 at 1:30 p.m., to show cause as to why they should not be held in contempt of court for violating the July 1, 2016 *Order Granting Attorney's Fees as a Sanction (NRCP 11)*. Contempt is punishable by up to 25 days in jail and a fine of up to $500. If, prior to the hearing, Plaintiffs comply with the 2016 *Order Granting Attorney's Fees as a Sanction (NRCP 11)* and file proof of compliance, the hearing will be vacated.

DATED this 17th day of July, 2019.

THOMAS W. GREGORY
DISTRICT JUDGE

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

Copies served by mail on July 17th, 2019, addressed to:

Michael Matuska, Esq.
2310 South Carson Street, #6
Carson City, Nevada 89701

Mark Forsberg, Esq.
504 Musser Street, Suite 302
Carson City, Nevada 89701

Erin C. Plante

Erin C. Plante

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

Exhibit 3

ORDER DENYING MOTION FOR ATTORNEY FEES

(Notice of Cross-Appeal)

Exhibit 3

ORDER DENYING MOTION FOR ATTORNEY FEES

(Notice of Cross-Appeal)

RECEIVED
JUN 18 2018
Douglas County
District Court Clerk

Case No. 11-CV-0296

Dept. No. II

2018 JUN 18 AM 11:29
SUSIE R. WILLIAMS
CLERK
BY M. BIAGGINI DEPUTY

IN THE NINTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF DOUGLAS

PEGGY CAIN, an individual; JEFFREY CAIN, an individual; and HELI OPS INTERNATIONAL, LLC, and Oregon limited liability company,

Plaintiffs,

vs.

D.R. RAWSON, an individual; C4 WORLDWIDE, INC., a Nevada corporation; RICHARD PRICE, an individual; JOE BAKER, an individual; MICKEY SHACKELFORD, an individual; MICHAEL K. KAVANAGH, an individual; JEFFREY EDWARDS, an individual; and DOES 1 through 10, inclusive,

Defendants.

/

ORDER DENYING MOTION FOR ATTORNEY FEES

THIS MATTER comes before the Court on Plaintiffs' *Motion for Attorney Fees*, filed May 7, 2018. Defendants Price and Schackelford filed an *Opposition to Plaintiffs' Motion for Attorney Fees* on May 17, 2018. Plaintiffs filed a *Reply to Motion for Attorney Fees* on May 23, 2018.

The Court having considered the briefs and the record herein, finds and orders as follows:

On March 9, 2015, Plaintiffs filed a motion to compel

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

Defendants Price and Schackelford ("Defendants") to produce their personal W-2's, form 1099's and any and all personal tax returns for the years 2009 and 2010. Defendant's opposed, contending Plaintiffs could not establish the factual predicate for discovering confidential income tax information. *Hetter v. District Court*, 110 Nev. 513 (1994). The Court agreed with Defendants and denied Plaintiffs' motion to compel.

Plaintiffs appealed. The Nevada Supreme Court reversed, finding that Plaintiffs sufficiently established the factual predicate. *Cain v. Price*, 134 Nev.Adv.Op 26, p. 10 (2018). "While the evidence of the factual predicate might not be "clear and convincing," it does constitute "some factual basis." *Id.*

Citing NRCP 37, Plaintiffs request attorney's fees for litigating the motion to compel at the district court level and on appeal. Plaintiffs specifically request "$4,375 in connection with their Third Motion to Compel in District Court," and $127,310 "for the entire combined cost of the appeal." Defendants are opposed.

When granting a motion to compel, a court shall require the opposing party to pay "reasonable expenses incurred in making the motion, including attorney's fees, unless the court finds...that the opposing party's nondisclosure, response or objection was substantially justified, or that other circumstances make and award of expenses unjust." NRCP 37(4)(A).

The information requested by Plaintiffs carries particular legal protection. Specifically:

///

///

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

> Because of the policy considerations of protecting taxpayer privacy and encouraging the filing of full and accurate tax returns, both state and federal courts have subjected discovery requests for income tax returns to a heightened scrutiny, especially in the context of requests for punitive damages.

Hetter v. District Court, 110 Nev. 513, 519 (1994).

> While this state [Nevada] does not recognize a privilege for tax returns or necessarily require that liability for punitive damages be established before discovery of financial condition, public policy suggests that tax returns or financial status not be had for the mere asking. Claims for punitive damages can be asserted with ease and can result in abuse and harassment if their assertion alone entitles plaintiff to financial discovery. *See*, Moran v. International Playtex, Inc., 480 N.Y.S.2d 6, 8 (N.Y. App. Div. 1984). We hold that before tax returns or financial records are discoverable on the issue of punitive damages, the plaintiff must demonstrate some factual basis for its punitive damage claim.

Id. at 520; *see also*, *Cain v. Price*, 134 Nev.Adv.Op 26, p. 10 (2018).

Since the information at issue cannot "be had for the mere asking," Defendants were substantially justified in denying disclosure pending judicial determination of the factual predicate. NRCP 37(4)(A). This is particularly so given the small quantum of evidence supporting the factual predicate. It would be unjust to award attorney's fees to Plaintiffs under these circumstances. *Id.* Also, the law does not provide for an award of attorney's fees incurred on appeal. *Bd. of Gallery of History v. Datecs Corp.*, 116 Nev. 286, 288 (2000).

///

///

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

Good cause appearing,

IT IS HEREBY ORDERED that Plaintiffs' *Motion for Attorney Fees* is **DENIED.**

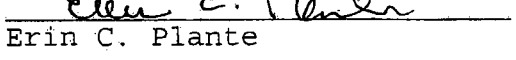
DATED this 18th day of June, 2018.

THOMAS W. GREGORY
DISTRICT JUDGE

Copies served by mail on June 18th, 2018, addressed to:

Michael Matuska, Esq.
2310 South Carson Street, Suite 6
Carson City, Nevada 89701

Mark R. Forsberg, Esq.
504 E. Musser Street, Suite 302
Carson City, Nevada 89701



Erin C. Plante

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

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Douglas County
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FILED
2019 DEC 13 PM 12: 09
WILLIAMS
CLERK
BY DEPUTY

CASE NO.: 11-CV-0296

DEPT. NO.: II

This document does not contain personal information of any person.

THE NINTH JUDICIAL DISTRICT COURT OF NEVADA

IN AND FOR THE COUNTY OF DOUGLAS

PEGGY CAIN, an individual; JEFFREY CAIN, an individual; and HELI OPS INTERNATIONAL, LLC, an Oregon limited liability company,

Plaintiffs,

v.

D.R. RAWSON, an individual; C4 WORLDWIDE, INC., a Nevada corporation; RICHARD PRICE, an individual; JOE BAKER, an individual; MICKEY SHACKELFORD, an individual; MICHAEL K. KAVANAGH, an individual; and JEFFREY EDWARDS, an individual,

Defendants.

CASE APPEAL STATEMENT

MATUSKA LAW OFFICES, LTD.
2310 South Carson Street, Suite 6
Carson City NV 89701
(775) 350-7220

COME NOW Plaintiffs, PEGGY CAIN, JEFFREY CAIN, and HELI OPS INTERNATIONAL, LLC, (hereinafter collectively referred to as "the Cains"), by and through their counsel of record, Matuska Law Offices, Ltd., Michael L. Matuska, Esq. and hereby file this Case Appeal Statement as follows:

1. Name of Appellant Filing This Case Appeal Statement:

PEGGY CAIN, JEFFREY CAIN, and HELI OPS INTERNATIONAL, LLC

2. Name of the Judge Issuing the Decision, Judgment, or Order Appealed From:

Hon. Thomas W. Gregory

3. Name of Each Appellant and Counsel for Each Appellant:

PEGGY CAIN, JEFFREY CAIN, and HELI OPS INTERNATIONAL, LLC

Counsel: Matuska Law Offices, Ltd., Michael L. Matuska, 2310 S. Carson Street, Suite 6, Carson City, Nevada 89701.

4. Name of Each Respondent and Counsel for Each Respondent:

Richard Price, Mickey Shackelford

Counsel: Oshinski & Forsberg, Ltd., Mark Forsberg, Esq., 504 East Musser Street, Suite 202 Carson City NV 89701

5. Name of Any Attorney Not Licensed to Practice Law in Nevada and Whether the Attorney Has Been Granted Permission to Appear Under SCR 42:

None

6. Whether Appellant's Counsel in the District Court was Appointed or Retained:

Retained

7. Whether Appellant's Counsel on Appeal was Appointed or Retained:

Retained

8. In Forma Pauperis:

None of the parties requested or were granted leave to proceed *in forma pauperis*

9. The Date the Proceedings Commenced in the District Court:

Complaint – September 14, 2011

10. Brief Description of the Nature of the Action and Result in District Court:

This case against the remaining defendants Richard Price and Mickey Shackelford has previously been on appeal, Consolidated Case Nos. 69333, 69889, 70864. Those appeals arose from an order granting summary judgment in favor of Price and Shackelford and awarding attorney's fees. The summary judgment and attorney's fees order were reversed and the case was remanded to the district court. See *Cain v. Price*, 134 Nev. Adv. Op. 26 (2018). That opinion also reversed an order denying Plaintiffs' motion to compel and awarding attorney's fees against Plaintiffs. Following reversal and remand, Plaintiffs filed a motion for attorney's fees stemming from the discovery dispute, which was denied, and eventually moved to dismiss the case, which was granted. Price and Shackelford have appealed the dismissal. That appeal has not been docketed or assigned a case number as this date. This is a cross-appeal in that same case.

MATUSKA LAW OFFICES, LTD.
2310 South Carson Street, Suite 6
Carson City NV 89701
(775) 350-7220

Plaintiffs herein appeal from the order denying an award of attorney's fees in relation to their motion to compel, and another order awarding a monetary sanction.

11. Prior or Related Proceedings in the Supreme Court:

Price and Shackelford already appealed the November 1, 2019 order dismissing the case. That appeal has not been docketed or assigned a case number as this date. This is a cross-appeal in that same case.

Prior proceedings in the Supreme Court include:

Petition 71548 which culminated in the opinion *Rawson v. District Court (M. Rawson)*, 133 Nev. Adv. Op. 44 (2017).

Consolidated Appeals 69333, 69889 and 70864 which culminated in the opinion *Cain v. Price*, 134 Nev. Adv. Op. 26 (2018).

Appeal 76381 was dismissed upon a stipulation and order.

12. Possibility of a Settlement:

Appellants believe this case is appropriate for settlement.

Dated this 13th day of December, 2019.

MATUSKA LAW OFFICES, LTD.

By: _____

MICHAEL L. MATUSKA, SBN 5711
2310 South Carson Street, Suite 6
Carson City, NV 89701
Attorneys for Plaintiffs/Appellants

MATUSKA LAW OFFICES, LTD.
2310 South Carson Street, Suite 6
Carson City NV 89701
(775) 350-7220

MATUSKA LAW OFFICES, LTD.
2310 South Carson Street, Suite 6
Carson City NV 89701
(775) 350-7220

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of Matuska Law Offices, Ltd., and that on the 13th day of December, 2019, I served a true and correct copy of the preceding document entitled **CASE APPEAL STATEMENT** as follows:

Mark Forsberg, Esq.
Oshinski & Forsberg, Ltd.
504 East Musser Street, Suite 202
Carson City NV 89701

Attorneys for Defendants Richard Price and
Mickey Shackelford

[**X**] **BY U.S. MAIL:** I deposited for mailing in the United States mail, with postage fully prepaid, an envelope containing the above-identified document(s) at Carson City, Nevada, in the ordinary course of business.

[ ] **BY EMAIL ONLY:**

[ ] **BY PERSONAL SERVICE:** I personally delivered the above-identified document(s) by hand delivery to the office(s) of the person(s) named above.

[ ] **BY FACSIMILE:**

[ ] **BY FEDERAL EXPRESS ONE-DAY DELIVERY.**

[ ] **BY MESSENGER SERVICE:** I delivered the above-identified document(s) to Reno-Carson Messenger Service for delivery.

Suzette Turley

SUZETTE TURLEY

I:\Client Files\Litigation\Heli Ops\v. Rawson\Pldgs\Case Appeal Stmt (Cross-Appeal).doc

Douglas County District Court
Case Summary Report

Case #: 2011-CV-00296
Case Title: Cain, Et Al vs. Rawson, Et Al
Filed: 09/14/2011
Cause: Other Contract DV: N

Case Status: Disposed Date: 04/22/2015

Parties

Party	Name	Status
Plaintiff	Cain, Jeffrey	
Plaintiff	Cain, Peggy	
Plaintiff	Heli Ops International, LLC	
Defendant	C4 Worldwide, Inc.	
Defendant	Rawson, D.R.	
Defendant	Edwards, Jeffrey	
Defendant	Kavanagh, Michael K.	
Defendant	Shackelford, Mickey	
Defendant	Baker, Joe	
Defendant	Price, Richard	
Other	Kavanagh, Kathryn	
Other	Price, Richard	
Other	Rawson, Margaret L.	

Party	Name	Bar #	Status	Representing
Attorney	Matuska, Michael L	5711	Current	
Attorney	Forsberg, Mark	004265	Current	
Attorney	Oshinski, Richard	004127	Current	
Attorney	Mougin, Robert P	7104	Current	
Attorney	Forsberg, Mark	004265	Current	
Attorney	Johnson, Michael K	6360	Current	

Events

Date/Time	Type
10/07/2013	Civil/Probate Hearings
10/14/2013	Civil/Probate Hearings
01/02/2014	Calendar Call
08/10/2015	Pre-Trial Conference
09/15/2015	Civil Jury Trial
09/16/2015	Civil Jury Trial
09/17/2015	Civil Jury Trial
09/18/2015	Civil Jury Trial
09/22/2015	Civil Jury Trial
09/23/2015	Civil Jury Trial
12/08/2015	Motion Hearing
12/09/2015	Motion Hearing
12/10/2015	Motion Hearing
04/19/2016	Civil Jury Trial
04/20/2016	Civil Jury Trial
04/21/2016	Civil Jury Trial
04/22/2016	Civil Jury Trial
04/26/2016	Civil Jury Trial
04/27/2016	Civil Jury Trial
12/23/2016	Calendar Call

Date/Time	Type
07/29/2019	Order to Show Cause
08/19/2019	Status Hearing
09/09/2019	Motion Hearing

Documents

Date	Code	Description
09/14/2011	DSBA	Summons Issued - Summons Issued - Jeffrey EdwardsFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/14/2011	DSBA	Summons Issued - Summons Issued - Michael KavanaghFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/14/2011	DSBA	Summons Issued - Summons Issued - Mickey ShackelfordFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/14/2011	DSBA	Summons Issued - Summons Issued - Joe BakerFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/14/2011	DSBA	Summons Issued - Summons Issued - Richard PriceFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/14/2011	DSBA	Summons Issued - Summons Issued - C4 WorldwideFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/14/2011	DSBA	Summons Issued - Summons Issued D.R. RawsonFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/14/2011	DCOM	Complaint - Complaint (Claims for Breach of ContractFraud, and Civil Conspiracy) Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/18/2011	DSF	Summons Filed - Summons Filed (Joe Baker)Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/18/2011	DSF	Summons Filed - Summons Filed (Richard Price)Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/26/2011	DAFS	Affidavit of Service - Affidavit of ServiceFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/26/2011	DSF	Summons Filed - Summons Filed (D.R. Rawson)Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/26/2011	DSF	Summons Filed - Summons Filed (C4 Worldwide)Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/26/2011	DSF	Summons Filed - Summons Filed (Jeffrey Edwards)Filed by PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC, , PLT001-Cain, Peggy
10/31/2011	DN	Notice of - Notice of Change of Law FirmFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
11/17/2011	DSF	Summons Filed - Summons Filed (Kavanaugh)
11/22/2011	DNID	Notice of Intent to Take Default - Notice of Intent to Take DefaultFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
12/01/2011	MMOT	Motion - Notice of and Motion to Dismiss, or inthe Alternative, for a More Definite Statement Filed by DEF001-Rawson, D.R., DEF004-Baker, Joe, DEF005-Shackelford, Mickey, DEF006-Kavanagh, Michael K., DEF007-Edwards, Jeffrey, DEF002-C4 Worldwide, Inc.,
12/01/2011	DSF	Summons Filed - Summons Filed (Shackelford)Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
12/22/2011	DOPP	Opposition to Motion - Opposition to Motion to DismissFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
12/29/2011	DNRA	Notice of Reassignment - Notice of ReassignmentFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
12/29/2011	DPCH	Peremptory Challenge - Peremptory ChallengeFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
01/04/2012	DREP	Reply to - Reply Points and Authorities in Supportof Motion to Dismiss, or in the Alternative, for a More Definite Statement Filed by DEF001-Rawson, D.R., DEF004-Baker, Joe, DEF005-Shackelford, Mickey, DEF007-Edwards, Jeffrey, DEF002-C4 Worldwide, Inc.,
01/19/2012	DORD	Order - Order Denying Motion to Dismiss andGranting Leave to Amend
02/02/2012	DASR	Answer - AnswerFiled by DEF001-Rawson, D.R., DEF002-C4 Worldwide, Inc., , DEF003-Price, Richard, DEF004-Baker, Joe, DEF005-Shackelford,

Date	Code	Description
03/22/2012	DPEX	Request for Exemption From Arbitration - Request for Exemption From Arbitration
04/23/2012	DORD	Order - Order
04/27/2012	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
05/02/2012	DCAM	Amended Complaint - First Amended Complaint (Breach ofContract, Fraud, Negligence, Civil Conspiracy)
06/14/2012	DDJT	Demand for Jury Trial - Demand for Jury TrialFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
07/09/2012	DCCR	16.1 Case Conference Report - Plaintiffs' 16.1 Case Conference ReportFiled by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
07/11/2012	DCCR	16.1 Case Conference Report - Defendants' NRCP 16.1 Unilateral CaseConference Report Filed by DEF002-C4 Worldwide, Inc., , DEF001-Rawson, D.R., DEF003-Price, Richard, DEF004-Baker, Joe, DEF005-Shackelford, Mickey, DEF006-Kavanagh, Michael K.
07/27/2012	MMOT	Motion - Notice of and Renewed Motion to Dismissor for Summary Judgment Filed by DEF007-Edwards, Jeffrey, DEF006-Kavanagh, Michael K., DEF005-Shackelford, Mickey, DEF004-Baker, Joe, DEF003-Price, Richard, DEF002-C4 Worldwide, Inc., , DEF001-Rawson, D.R.
08/31/2012	DSMD	Statement - Statement of Undisputed Material FactsFiled by PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
08/31/2012	DAFF	Affidavit of - Affidavit of Michael MatuskaFiled by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
08/31/2012	DAFF	Affidavit of - Affidavit of Jeffrey CainFiled by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
08/31/2012	DOPP	Opposition to Motion - Opposition to Motion to Dismiss or forSummary Judgment Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
09/04/2012	DAFF	Affidavit of - Affidavit of Dan Witt
09/14/2012	MMOT	Motion - Motion for Leave to File Second AmendedComplaint Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
09/18/2012	DAFF	Affidavit of - Affidavit of Kerry Rucker
09/28/2012	DAFF	Affidavit of - Affidavit of Richard Price
09/28/2012	DAFF	Affidavit of - Affidavit of Joe Baker
09/28/2012	DAFF	Affidavit of - Affidavit of Jeffrey Edwards
09/28/2012	DAFF	Affidavit of - Affidavit of DR Rawson
09/28/2012	DSMD	Statement - Defendants' Statement of Facts; Re:Renewed Motion to Dismiss or for Summary Judgment Filed by DEF007-Edwards, Jeffrey, DEF006-Kavanagh, Michael K., DEF005-Shackelford, Mickey, DEF004-Baker, Joe, DEF003-Price, Richard, DEF002-C4 Worldwide, Inc., , DEF001-
09/28/2012	DREP	Reply to - Reply Points and Authorities in Supportof Renewed Motion to Dismiss or for Summary Judgment Filed by DEF001-Rawson, D.R., DEF003-Price, Richard, DEF004-Baker, Joe, DEF005-Shackelford, Mickey, DEF006-Kavanagh, Michael K., DEF007-Edwards, Jeffrey, DEF002-C
10/03/2012	DOPT	Opposition to - Defendant's Opposition To Plaintiffs'Motion to File Second Amended Complaint
10/09/2012	DREP	Reply to - Reply to Opposition to Plaintiffs'Motion for Leave to File Second Amended Complaint Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/12/2012	DREQ	Request - Request for Oral Argument on DispositiveMotions (NJDCR 6(e)) Filed by DEF002-C4 Worldwide, Inc., , DEF001-Rawson, D.R., DEF003-Price, Richard, DEF004-Baker, Joe, DEF005-Shackelford, Mickey, DEF006-Kavanagh, Michael K., DEF007-Edwards, Jeffrey
10/16/2012	DRSU	Request for Submission - Request for SubmissionFiled by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy

Date	Code	Description
11/20/2012	DSUP	Supplement - Supplemental Points and Authorities inOpposition to Motion to Dismiss or for Summary Judgment Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
11/20/2012	MMOT	Motion - Motion for Leave to File SupplementalPoints and Authorities in Opposition to Motion to Dismiss or for Summary Judgment Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
11/20/2012	DORD	Order - Order Denying Renewed Motion to DismissRe Personal Jurisdiction or for Summary Judgment, and Granting Second Motion for Leave to Amend
11/26/2012	DWIT	Withdrawal of - Withdrawal of Motion for Leave to FileSupplemental Points and Authorities in Opposition to Motion to Dismiss or for Summary Judgment
11/27/2012	DCAM	Amended Complaint - Second Amended Complaint (Breach ofContract, Fraud, Negligence, Civil Conspiracy, Conversion, Constructive Trust)
12/13/2012	DN	Notice of - Notice of and Application for Order ofWithdrawal of Attorney
12/18/2012	DORD	Order - Order Granting Withdrawal of Counsel
12/21/2012	DOPP	Opposition to Motion - Partial Opposition to Notice of AndApplication for Order of Withdrawal of Attorney Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
12/27/2012	DSOA	Substitution of Attorneys - Substitution of Attorney
01/03/2013	DNID	Notice of Intent to Take Default - Notice of Intent to Take Default
01/07/2013	DNID	Notice of Intent to Take Default - Notice of Intent to Take Default
01/08/2013	DSOA	Substitution of Attorneys - Substitution of Attorney
01/08/2013	DSOA	Substitution of Attorneys - Substitution of Attorney
01/08/2013	DNID	Notice of Intent to Take Default - Notice of Intent to Take Default
01/10/2013	DASR	Answer - Defendant Joe Baker's Answer to SecondAmended Complaint
01/10/2013	DSOA	Substitution of Attorneys - Substitution of Attorneys
01/15/2013	DAPP	Application For - Application for Entry of Default
01/15/2013	DDEF	Default - Default (Clerk's)
01/15/2013	DNID	Notice of Intent to Take Default - Notice of Intent to Take Default
01/15/2013	DNID	Notice of Intent to Take Default - Notice of Intent to Take Default
01/17/2013	DN	Notice of - Notice of and Application for Orderof Withdrawal of Attorney
01/23/2013	DDEF	Default - Default
01/23/2013	DAPP	Application For - Application for Entry of Default
01/24/2013	DNEO	Notice of Entry of Order - Notice of Entry of Default
01/24/2013	DDEF	Default - Default
01/24/2013	DAPP	Application For - Application for Entry of Default
01/24/2013	DDEF	Default - Default
01/24/2013	DAPP	Application For - Application for Entry of Default
01/28/2013	DORD	Order - Order Granting Withdrawal of Counsel
01/30/2013	DNEO	Notice of Entry of Order - Notice of Entry of Default
02/01/2013	DNEO	Notice of Entry of Order - Notice of Entry of Order
02/06/2013	DNEO	Notice of Entry of Order - Notice of Entry of Default
02/06/2013	DNEO	Notice of Entry of Order - Notice of Entry of Default
02/13/2013	DASR	Answer - Answer
02/13/2013	DSPI	Special Interrogatories - Interrogatories
02/14/2013	DCOS	Certificate of Service - Certificate of Service
02/14/2013	DSPI	Special Interrogatories - Interrogatories
02/14/2013	DASR	Answer - Answer
02/15/2013	DASR	Answer - Answer
02/15/2013	DASR	Answer - Answer
03/14/2013	MMOT	Motion - Motion for Default Judgment
03/14/2013	DAFF	Affidavit of - Affidavit of Jeffrey K. Cain
03/14/2013	DAFF	Affidavit of - Affidavit of Michael L. Matuska
03/14/2013	DMEM	Memorandum of Costs and Disbursements - Verified Memorandum of Costs
03/21/2013	MMOT	Motion - Plaintiff's first Motion to Compel
03/21/2013	MMOT	Motion - Motion to Certify Judgment as Final
03/21/2013	DAFF	Affidavit of - Affidavit of Michael L. Matuska inSupport of First Motion to

Date	Code	Description
03/29/2013	DOPP	Opposition to Motion - Defendant Mickey Shackelford'sOpposition to Plaintiff's Motion for Default Judgment and Motion to Set Aside Default Judgment
04/04/2013	DOPP	Opposition to Motion - Joe Baker's Opposition to Plaintiffs'First Motion to Compel; Motion for Sanctions
04/08/2013	DOPP	Opposition to Motion - Defendant Richard Price's Opposition toPlaintiffs' First Motion to Compel
04/09/2013	DREP	Reply to - Reply to Opposition to Motion forDefault Judgment and Request for Evidentiary Hearing
04/09/2013	DREP	Reply to - Reply to Oppositions to Motion to Compel
04/09/2013	DAFF	Affidavit of - Affidavit of Michael L. Matuska inSupport of Plaintiffs' Reply to Oppositions to First Motion to Compel
05/07/2013	DORD	Order - Order Granting Motion for DefaultJudgments and Setting Aside Default Judgment Against Mickey Shackelford
05/07/2013	DORD	Order - Order Granting Motion to Compel in Partand for Attorney's Fees and Costs
05/10/2013	DNEO	Notice of Entry of Order - Notice of Entry of Order
05/10/2013	DNEO	Notice of Entry of Order - Notice of Entry of Order
05/17/2013	DNEO	Notice of Entry of Order - Amended Notice of Entry of Order
05/17/2013	DDFJ	Default Judgment - Default Judgment
05/20/2013	CONV	Conversion Document - Notice of Recorded JudgmentJudgment
05/20/2013	CONV	Conversion Document - Judgment EnteredJudgment
05/21/2013	DNEO	Notice of Entry of Order - Notice of Entry of Default Judgment
06/04/2013	WEX	Writ of Execution - Writ of Execution Issued(Defendant Michael K. Kavanagh)
06/04/2013	WEX	Writ of Execution - Writ of Execution Issued(Defendant C4 Worldwide)
06/04/2013	WEX	Writ of Execution - Writ of Execution Issued(Defendant Dr. Rawson)
06/04/2013	DAFF	Affidavit of - Affidavit of Costs
06/14/2013	DAFF	Affidavit of - Affidavit of Costs
06/14/2013	WEX	Writ of Execution - Writ of Execution Issued
06/24/2013	WEX	Writ of Execution - Writ of Execution Issued
06/24/2013	DAFF	Affidavit of - Affidavit of Costs
07/29/2013	DAFF	Affidavit of - Affidavit of Costs
07/29/2013	WEX	Writ of Execution - Writ of Execution Issued
07/29/2013	DAFF	Affidavit of - Affidavit of Costs
07/29/2013	WEX	Writ of Execution - Writ of Execution Issued
07/29/2013	DAFF	Affidavit of - Affidavit of Costs
07/29/2013	WEX	Writ of Execution - Writ of Execution Issued
07/29/2013	WEX	Writ of Execution - Writ of Execution Filed
07/29/2013	WEX	Writ of Execution - Writ of Execution Filed
07/29/2013	WEX	Writ of Execution - Writ of Execution Filed
09/23/2013	DDIS	Disclaimer - Claim of Exemption from Execution
09/25/2013	NHRG	Notice of Hearing - Notice of Hearing
09/25/2013	DCOS	Certificate of Service - Certificate of Service
09/25/2013	DRES	Response to - Response to Claim of Exemption, Requestfor Hearing and Request for Issuance of Summons
09/25/2013	DAFF	Affidavit of - Affidavit of Counsel in Support ofResponse to Claim of Exemption, Request for Hearing and Request for Issuance of Summons
10/03/2013	DROC	Rejection of Claim - Claim of Exemption from Execution
10/04/2013	DRES	Response to - Response to Claims of Exemption andRequest for Hearing and Request for Hearing
10/04/2013	NHRG	Notice of Hearing - Notice of Hearing
10/07/2013	DORD	Order - Order for Issuance of Summons
10/07/2013	DORD	Order - Order
10/09/2013	DSBA	Summons Issued - Summons Issued
10/09/2013	DNEO	Notice of Entry of Order - Notice of Entry of Order
10/09/2013	DNEO	Notice of Entry of Order - Notice of Entry of Order
10/14/2013	DORD	Order - Order
10/14/2013	DORD	Order - Order
10/14/2013	DAFF	Affidavit of - Affidavit of Jeffrey K. Cain in Supportof Application For Post-Judgment Order (NRS 21.320)

Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops

Date	Code	Description
10/14/2013	DAPP	Application For - Application for Post-Judgment Order(NRS 21.320) Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/14/2013	DRHR	Case Reopened (clerk error) - Case Reopened
10/15/2013	DNEO	Notice of Entry of Order - Notice of Entry of Order
10/16/2013	DNEO	Notice of Entry of Order - Notice of Entry of Order
10/18/2013	DORD	Order - Order
10/21/2013	WEX	Writ of Execution - Writ of Execution Filed
10/28/2013	DREQ	Request - Request for Clarification and FinalOrder
10/29/2013	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/30/2013	DSF	Summons Filed - Summons Filed
10/30/2013	DAOR	Amended Order - Amended Order
10/31/2013	DORD	Order - Order Vacating Order Filed October 30,2013
11/01/2013	DREP	Reply to - Reply to Opposition to Request forClarification and Final Order Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
11/04/2013	DOPT	Opposition to - Opposition To Plaintiff's Request forClarification and Final Order
11/05/2013	DTRN	Transcript of Proceedings - Transcript of Proceedings-Hearing onClaims of Exemption 10/14/13
11/05/2013	DAPP	Application For - Application for Entry of DefaultFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
11/07/2013	DDEF	Default - DefaultFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
11/07/2013	DOPP	Opposition to Motion - Margaret Rawson's Opposition to andMotion to Quash the Summons to Add her Name to the Current Judgment Pursuant to NRS 17.060
11/08/2013	DRES	Response to - Margaret Rawson's Response toPlaintiff's Reply to Opposition to Request for Clarification and Final Order
11/12/2013	DNEO	Notice of Entry of Order - Notice of Entry of Default
11/13/2013	DCOS	Certificate of Service - Certificate of Service
11/14/2013	DOPT	Opposition to - Margaret Rawson's Opposition toApplication for Entry of Default
11/14/2013	DREQ	Request - Margaret Rawson's Renewed Claim forExemption Pursuant to NRS 21.112 and NRS 31.070 and Subsequent Motion to Quash Bank Levy Issued by Plaintiff and the Douglas County Sheriff
11/19/2013	DRES	Response to - Supplemental Response to MargaretRawson's Renewed Claim of Exemption
11/20/2013	MMOT	Motion - Margaret Rawson's Motion to Set AsideDefault
11/25/2013	DN	Notice of - Notice of Non-Opposition
11/27/2013	DREP	Reply to - Margaret Rawson's Reply to Plaintiff'sSupplemental Response to Renewed Claim for Exemption and Motion to Quash Previous Garnishment
12/10/2013	DRTM	Response to Motion - Response To Margaret Rawson's Oppositionto and Motion to Quash the Summons
12/11/2013	DORD	Order - Order Granting Motion to Clarify and toSet Aside Default and Setting Hearing for Final Determination on Rawson's Claim of Exemption, Etc, and Margaret Rawson's Motion to Quash Summons on January 2, 2014 at 10:00 a.m.
12/23/2013	DRES	Response to - Response to Margaret Rawson's RenewedClaim of Exemption
12/23/2013	DSMD	Statement - Hearing Statement
12/24/2013	DCOS	Certificate of Service - Certificate of Service
12/26/2013	DRES	Response to - Margaret Rawson's Response toPlaintiff's Hearing Statement
01/15/2014	DSUP	Supplement - Supplemental Response to MargaretRAwson's Opposition to and Motion Quash the Summons
02/10/2014	DORD	Order - Order Denying Rawson's Claim ofExemption and Denying Motion to Quash Summons
02/11/2014	DNEO	Notice of Entry of Order - Notice of Entry of Order

Date	Code	Description
02/11/2014	MMOT	Motion - Plaintiffs' Motion for Sanctions and forOrder to Show Cause Re: Contempt
02/28/2014	DASR	Answer - Margaret Rawsons Answer to Plaintiff'sDefault Judgment and Second Amended Complaint
02/28/2014	DIAF	Initial Appearance Fee Disclosure - Initial Appearance Fee Disclosure
03/04/2014	DRSU	Request for Submission - Request for Submission
03/10/2014	DDJT	Demand for Jury Trial - Margaret Rawson's Demand for Jury Trial
03/12/2014	DORD	Order - Order
03/14/2014	DNEO	Notice of Entry of Order - Notice of Entry of Order
03/14/2014	DAPP	Application For - Application for Entry of Default
03/17/2014	DDEF	Default - Default
03/19/2014	DNEO	Notice of Entry of Order - Notice of Entry of Default
04/28/2014	DSOB	Suggestion of Bankruptcy - Suggestion Of Bankruptcy
08/18/2014	DRTR	Request for Trial - Request for Trial Setting
08/22/2014	DOCC	Order (Calendar Call) - Order (Calendar Call)
09/04/2014	DSMD	Statement - Statement of Undisputed Material FactsFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/04/2014	DAFF	Affidavit of - Affidavit of Jeffrey CainFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/04/2014	DAFF	Affidavit of - Affidavit of Michael L. Matuska inSupport of Motion for Summary Judgment Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/04/2014	MMOT	Motion - Motion for Summary JudgmentFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/05/2014	DIFQ	Information Questionnaire - Information Questionnaire
09/09/2014	DIFQ	Information Questionnaire - Information QuestionnaireFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/10/2014	DIFQ	Information Questionnaire - Information Questionnaire
09/17/2014	DOPP	Opposition to Motion - Joe Baker's Opposition to Plaintiffs'Motion for Summary Judgment Against Defendant Jeffrey Edwards, Objection to Proposed Order Granting Summary Judgment
09/17/2014	MMOT	Motion - Motion to Strike and Objection toAffidavits of Jeffrey Cain, Kerry Rucker and Dan Witt
09/17/2014	MMOT	Motion - Joe Baker's Motion for Summary Judgment(Oral Argument Requested)
09/22/2014	DAFF	Affidavit of - Affidavit of Mickey Shackelford inSupport of Opposition to Plaintiffs' Motion for Summary Judgment Against Defendant Jeffrey Edwards
09/22/2014	DAFF	Affidavit of - Affidavit of Richard Price in Support ofOpposition to Plaintiffs' Motion for Summary Judgement Against Defendant Jeffrey Edwards
09/22/2014	DAFF	Affidavit of - Affidavit of Jeffrey Edwards in Supportof Opposition to Plaintiff's Motion for Summary Judgement
09/22/2014	DOPT	Opposition to - Defendants Richard Price and MickeyShackelford's Opposition to Plaintiffs' Motion for Summary Judgement Against Defendant Jeffrey Edwards
09/22/2014	DRSU	Request for Submission - Request for Submission
09/24/2014	DOST	Order Setting Trial - Trial Setting Order
09/24/2014	DSOO	Scheduling Order - Scheduling Order
09/25/2014	DPRS	Proof of Service - Proof of ServiceFiled by DEF005-Shackelford, Mickey, DEF004-Baker, Joe, DEF003-Price, Richard
09/26/2014	DJOI	Joinder - Joinder in all Defendants' Opposition toPlaintiffs' Motion for Summary Judgment
09/30/2014	MMOT	Motion - Defendants Richard Price and MickeyShackelford's Motion to Strike Plaintiffs' Request for Submission Filed by DEF003-Price, Richard, DEF005-Shackelford, Mickey
09/30/2014	DJOI	Joinder - Defendants Richard Price and MickeyShackelford's Joinder in Defendant Joe Baker's Motion for Summary Judgment (Oral Arugment Requested) Filed by DEF005-Shackelford, Mickey, OTH003-Price, Richard
09/30/2014	DJOI	Joinder - Defendants Richard Price and MickeyShackelford's Joinder in Defendant Joe Baker's Motion to Strike and Objection to Affidavits of Jeffrey Cain, Kerry Rucker and Dan Witt
10/06/2014	DAFF	Affidavit of - Affidavit of Jeffrey Cain

Date	Code	Description
10/06/2014	DOPP	Opposition to Motion - Joe Baker's Joinder in Richard Priceand Mickey Shackelford's Opposition to Plaintiffs' Motion for Summary Judgment Against Jeffrey Edwards
10/17/2014	DREP	Reply to - Reply Brief Re: Joe Baker's Motion forSummary Judgment
11/13/2014	DSUP	Supplement - Supplement to Reply and Opposition toPending Motions Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
11/21/2014	DORD	Order - Order Denying Motions and for OtherRelief
11/24/2014	MMOT	Motion - Defendants Richard Price and MickeyShackelford's Motion to Strike Plaintiffs' Supplement to Reply and Opposition to Pending Motions
11/25/2014	DJOI	Joinder - Joe Baker's Joinder in DefendantsRichard Price and Mickey Shackelford's Motion to Strike Plaintiffs' Supplement to Reply and Opposition to Pending Motions
12/05/2014	DMOF	Motion for - Motion for Hearing and Order SpecifyingFacts That Appear Without Substantial Controversy (NRCP 56d Motion for Reconsideration of Joe Baker?s Motion for
12/23/2014	DREP	Reply to - Reply and Opposition to Pending MotionsFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
01/05/2015	DRRB	Respondent's Reply Brief - Joe Baker's Reply Brief Re: Motion forHearing and Order Specifying Facts That Appear Without Substantial Controversy (NRCP 56(d)) and Motion for Reconsideration of Joe Baker's Motion for Summary Judgment; Motion to Strike Plaintiff's Late Attempt to Provi
01/08/2015	DORD	Order - Order Denying Defendants' Motions (PriceShackelford and Baker)
01/09/2015	DN	Notice of - Notice of Change of Address and ContactInformation Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
01/13/2015	DNCA	Notice of Change of Address - Notice of Change of Firm Name andAddress Filed by DEF003-Price, Richard, DEF005-Shackelford, Mickey
01/13/2015	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
01/27/2015	DRES	Response to - Response to Request for Production ofDocuments Set No 4 Jeffrey Edwards In pro per
01/27/2015	DNOD	Notice of Deposition - Notice of Deposition Response JeffreyEdwards In pro per
02/09/2015	MMOT	Motion - Motion for Entry of Default JudgmentFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey
02/09/2015	DAFF	Affidavit of - Affidavit of Jeffrey Cain in Support ofMotion for Entry of Default Judgment
02/09/2015	MMOT	Motion - Motion for Leave to Amend Joe Baker'sAnswer to Plaintiffs' Second Amended Complaint (NRCP 15(a) NJDCR 13)
02/11/2015	MMOT	Motion - Motion for Leave to Amend Joe Baker'sAnswer to Plaintiff's Second Amended Complaint (NRCP 15(a) NJDCR 13)
02/24/2015	DOPT	Opposition to - Opposition To Joe Baker's Motion forLeave to File First Amended Answer; Cross Motion for Leave to File Third Amended Complaint
03/03/2015	DRSU	Request for Submission - Request for SubmissionFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey
03/09/2015	DREP	Reply to - Reply Brief Re: Motion for Leave toAmend Joe BAker's Answer to Plaintiff's Second Amended Complaint and Qualified Opposition to Plaintiffs Cross-Motion for Leave to File Third Amended Complaint
03/09/2015	DAFF	Affidavit of - Affidavit of Michael L Matuska inSupport of Third Motion to Compel
03/09/2015	MMOT	Motion - Plaintiffs' Third Motion to Compel
03/16/2015	DDFJ	Default Judgment - Default Judgment
03/17/2015	DASC	Answer to Counterclaim - Defendant Mickey Shackelford's Answer toSecond Amended Complaint (Breach of Conract Fraud, Negligence, Civil Conspiracy, Conversion, Constructive Trust)
03/19/2015	DOPT	Opposition to - Defendants Richard Price and MickeyShckelford's Opposition to Plaintiffs' Third Motion to Compel
03/25/2015	DORD	Order - Order Conditionally Granting Motions toAmend Pleadings (Plaintiff Cain and Defendant Baker)
03/26/2015	DDEC	Declaration of - Declaration of Michael K Johnson inSupport of Joe Baker's Opposition to Motion to Compel
03/26/2015	DOPP	Opposition to Motion - Joe Bakers Opposition to Plaintiffs'Third Motion to

Date	Code	Description
03/30/2015	DREP	Reply to - Reply to Opposition to Plaintiffs' ThirdMotion to Compel Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
03/30/2015	DCAM	Amended Complaint - Third Amended Complaint (Breach ofContract Fraud Negligence Civil Conspiricy Conversion Constructive Trust Intentional Interferance with Contractual Advantage
03/31/2015	DICM	Issued Commission - Issued CommissionFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
03/31/2015	DAPP	Application For - Application for Issuance of Commissionto take the Depostition of Kerry Rucker Outside the State of Nevada Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
03/31/2015	DICM	Issued Commission - Issued CommissionFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
03/31/2015	DAPP	Application For - Application for Issuance of Commissionto take the Deposition of Dan Witt Outside the State of Nevada Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
03/31/2015	DICM	Issued Commission - Issued CommissionFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
03/31/2015	DAPP	Application For - Application for Issuance of Commissionto take the Deposition of Gordon J. Evans Outside the State of Nevada Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
03/31/2015	DICM	Issued Commission - Issued CommissionFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
03/31/2015	DAPP	Application For - Application for Issuance of Commissionto Take the Deposition of William M. Parker Outside the State of Nevada Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
03/31/2015	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
04/17/2015	DASR	Answer - Defendant Joe Baker's Answer to ThirdAmended Complaint
04/21/2015	MMOT	Motion - Joe Baker's Motion For Judgment on thePleadings (NRCP 12(c)) Oral Argument Requested NJDCR 6 e(2)
04/21/2015	MMOT	Motion - Joe Baker's Motion For Leave to AmendHis Answer to Plaintiff's Third Amended Complaint
04/21/2015	DDEW	Disclosure of Expert Witness - Expert Disclosure by Joe Baker, RichardPrice and Mickey Shackelford Filed by DEF003-Price, Richard, DEF004-Baker, Joe, DEF005-Shackelford, Mickey
04/21/2015	DRHR	Case Reopened (clerk error) - Case Reopened
04/23/2015	DASC	Answer to Counterclaim - Defendant Mickey Shackelford's Answer toThird Amended Complaint (Breach of Contract, Fraud, Negligence, Civil Conspiracy, Conversion, Constructive Trust, Intentional Interference with Contractual Advantage)
04/23/2015	DASC	Answer to Counterclaim - Defendants Richard Prices's Answer toThird Amended Complaint (Breach of Contract, Fraud, Negligence, Civil Conspiracy, Conversion, Constructive Trust, Intentional Interference with Contractual Advantage)
04/27/2015	DSUP	Supplement - Supplement to Joe Baker's Motion forLeave to Amend His Answer to Plaintiff's Third Amended Complaint
05/05/2015	DRSU	Request for Submission - Request for SubmissionFiled by PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
05/05/2015	DRSU	Request for Submission - Second Request for SubmissionFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey
05/08/2015	DOPP	Opposition to Motion - Opposition to Joe Baker's Motion forJudgment on the Pleadings and Cross Motion for Partial Judgment on the Pleadings Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
05/08/2015	DORD	Order - Order Denying Plaintiff's Third Motionto Compel
05/08/2015	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
05/12/2015	DOPP	Opposition to Motion - Opposition to Motion to Joe Baker'sMotion for Leave to File First Amended Answer to Third Amended Complaint

Date	Code	Description
05/18/2015	DRBR	Appellant's Reply Brief - Reply Brief Re: Joe Baker's Motion forJudgment on the Pleadings; Opposition to Plaintiff's Cross-Motion for Partial Judgment on the Pleadings Oral Arguements Requested
05/19/2015	DREP	Reply to - Reply Brief RE: Jo Baker's Motion forLeave to File First Amended Answer to Plaintiffs' First Amended Complaint
05/28/2015	DJOI	Joinder - Joinder by Richard Price and MickeyShackelford in Joe Baker's Motion for Judgment on the Pleadings and Reply Brief
06/01/2015	DOPT	Opposition to - Opposition To Mickey Shackelford's andRichard Price's Joinder to Joe Baker's Motion for Judgment on the Pleadings Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
06/01/2015	DREP	Reply to - Plaintiff's Reply in Support of CrossMotion for Partial Judgment of the Pleadings Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
06/01/2015	DRSU	Request for Submission - Request for SubmissionFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
06/26/2015	DJOI	Joinder - Joe Baker's Joinder in DefendantsShackelford and Price's Motion for Protective Order
06/26/2015	MMOT	Motion - Motion for Protective OrderFiled by DEF003-Price, Richard, DEF005-Shackelford, Mickey
06/26/2015	MMOT	Motion - Motion for Order Shortening TimeFiled by DEF005-Shackelford, Mickey, DEF004-Baker, Joe, DEF003-Price, Richard
06/26/2015	DAFF	Affidavit of - Affidavit of Michael L. Matuska inSupport of Opposition to Motion for Protective Order Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
06/26/2015	DOPP	Opposition to Motion - Plaintiffs' Opposition to Defendants'Motion for Protective Order NRCP6(e) Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
06/26/2015	MMOT	Motion - Joe Baker's Motion For Protective Order;Joe Baker's Objection to Plaintiffs' Notice of Deposition
06/26/2015	MMOT	Motion - Ex Parte Motion For Order ShorteningTime to Respond to Joe Baker's Motion for Protective Order
07/06/2015	DOPP	Opposition to Motion - Plaintiff's Opposition to Joe Baker'sMotion for Protective Order
07/06/2015	DAFF	Affidavit of - Affidavit of Michael L Matuska inSupport of Opposition to Joe Baker's Motion for Protective Order
07/07/2015	DORD	Order - Order
07/16/2015	DOPP	Opposition to Motion - Joe Baker's Opposition to Plaintiff'sFirst Motion for Sanctions; Request for Attorney's Fees
07/16/2015	DOPP	Opposition to Motion - Joe Baker's Opposition to Plaintiffs'Second Motion for Sanctions; Request for Attorney's Fees
07/16/2015	DAAS	Amended Answer - Defendant Joe Bakerk's First AmendedAnswer to Third Amended Complaint
07/16/2015	DNEO	Notice of Entry of Order - Notice of Entry of Order
07/17/2015	MMOT	Motion - Joe Baker's Motion for (1) Hearingand/or to Bifurcate Trial and (2) to Stay a Portion of Trial Proceedings
07/20/2015	MMOT	Motion - Joe Baker's Motion For Order That MikeMurray be Made a Party Per NRCP 19(a)
07/20/2015	MJSM	Motion for Summary Judgment - Joe Baker's Motion for Partial SummaryJudgment as to Plaintiffs Jeffrey and Peggy Cain and Six of Their Seven Causes of Action (Oral Argument Requested)
07/20/2015	DOPP	Opposition to Motion - Defendant's Richard Price and MickeyShackelford's Opposition to Plaintiff's First Motion for Sanctions (NRCP 11)
07/20/2015	DOPP	Opposition to Motion - Defendants Richard Price and MickeyShackelford's Opposition to Plaintiff's Second Motion for Sanctions (NRCP 11)
07/23/2015	MJST	Motion to Strike Judgment - Motion to Strike Joe Bakers AffirmativeDefenses or in the Alternative for Partial Summary Judgment Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey
07/23/2015	MLIM	Motion in Limine - Plaintiff's First Motion in LimineFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey
07/23/2015	DAFF	Affidavit of - Affidavit of Jeffrey K Cain in Supportof Motion to Strike Joe Bakers Affirmative Defenses of in the Alternative for Partial Summary

Date	Code	Description
07/24/2015	MMOT	Motion - Motion to Strike Richard Price's andMickey Shackelford's Affirmative Defenses or, in the Alternative, for Partial Summary Judgment Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey
07/28/2015	DORD	Order - Order Granting in Part Defendant JoeBaker's Motion for Judgment on the Pleadings and Denying Plaintiff's Cross-Motion for Judgment on the Pleadings
07/29/2015	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
07/31/2015	DJOI	Joinder - Richard Price and Mickey Shackelford'sJoinder in Joe Baker's Motion for Order that Mike Murray be Made a Party Per NRCP 19(a)
07/31/2015	DJOI	Joinder - Richard Price and Mickey Shackelford'sJoinder in Joe Baker's Motion for Partial Summary Judgment as to Plaintiff's Jeffrey and Peggy Cain and Six of the Seven Causes of Action
07/31/2015	DJOI	Joinder - Richard Price and Mickey Shackelford'sJoinder in Joe Baker's Motion for (1) Hearing and/or Birfurcate Trial and (2) to Stay a Motion of Trial Proceedings
07/31/2015	DOPP	Opposition to Motion - Opposition to Motion for (1) Hearingand/or to Bifurcate Trial and (2) to Stay a Portion of the Trial Proceedings Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
07/31/2015	DOPP	Opposition to Motion - Opposition to Motion for Order that MikeMurray be Made a Party Per NRCP 19(a) Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
07/31/2015	MMOT	Motion - Motion for Extension of TimeFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
08/05/2015	MMOT	Motion - Motion For Partial Summary JudgmentFiled by DEF005-Shackelford, Mickey, DEF003-Price, Richard
08/05/2015	MMOT	Motion - Motion For Issuance of Commission ForOut-of-State Deposition Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
08/10/2015	DOPP	Opposition to Motion - Opposition of Defendants Richard Priceand Mickey Shackelford to Plaintiffs' Motion to Strike Richard Price's and Mickey Shackelford's Affirmative Defenses or, In the Alternative, for Partial Summary Judgment Filed by DEF003-Price, Richard, DEF005-Shackel
08/10/2015	DOPP	Opposition to Motion - Joe Baker's Opposition to Plaintiffs'First Motion in Limine
08/10/2015	DBRF	Brief of - Reply Brief RE: Opposition to Motion forOrder that Mike Murray be Made a Party Per NRCP 19(a)
08/10/2015	DBRF	Brief of - Reply Brief RE: Plaintiffs' Oppositionto Motion for (1) Hearing and to Bifurcate Trial and (2) to Stay a Portion of the Trial Proceedings
08/10/2015	DOPP	Opposition to Motion - Joe Baker's Opposition to Motion toStrike Joe Baker's Affirmation Defenses or, in the Alernative, for Partial Summary Judgment
08/12/2015	MMOT	Motion - Motion For Extension of Time to RespondTo Richard Price and Mickey Shackelford's Motion for Partial Summary Judgment Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
08/12/2015	DRTM	Response to Motion - Response To Joe Baker's Motion forPartial Summary Judgment as to Jeffrey and Peggy Cain and Six of Their Seven Causes of Action Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
08/14/2015	DJOI	Joinder - Richard Price and Mickey Shackelford'sJoinder in Joe Baker's Opposition to Plaintiffs' First Motion in Limine Filed by DEF003-Price, Richard, DEF004-Baker, Joe
08/17/2015	DAMD	Amended - Amended Trial Setting, Setting MotionsHearing, and Vacating Trial Date of September 15, 2015
08/17/2015	DORD	Order - Order Granting, in Part, Joe Baker'sMotion for (1) Hearing and/or to Bifurcate Trial and (2) to Stay a Portion of Trial Proceedings
08/17/2015	DORD	Order - Order Denying Motion for Order forProtection/Setting Time, Place for Depositions
08/17/2015	MMOT	Motion - Motion For Order Confirming Plaintiffs'Election of Remedy and For Summary Judgment Thereof

Date	Code	Description
08/17/2015	DOPP	Opposition to Motion - Joe Baker's Opposition to Motion forExtension of Time
08/17/2015	DDEC	Declaration of - Declaration of Michael K. Johnson inSupport of Joe Baker's Joinder in Denfendants Richard Price and Mickey Shackelford Motion for Partial Summary Judgment
08/17/2015	DJOI	Joinder - Joe Baker's Joinder in DefendantsRichard Price and Mickey Shackelford's Motion for Partial Summary Judgment (Oral Argument Requested)
08/18/2015	DREP	Reply to - Reply to Opposition to Motion to StrikeRichard Prices and Mickey Shacklefords Affirmative Defenses or in the Alternative for Partial Summary Judgment
08/18/2015	DREP	Reply to - Reply to Joe Bakers Opposition toPlaintiffs' Motion in Limine
08/19/2015	DORD	Order - Order Granting Plaintiffs' Motion forExtension of Time
08/21/2015	MMOT	Motion - Motion to Strike JoinderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
08/21/2015	DREP	Reply to - Reply to Opposition to Motion to StrikeJoe Baker's Affirmative Defenses or, in the Alternative, for Partial Summary Judgment Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
08/24/2015	DRTM	Response to Motion - [Renewed] Response to Joe Baker's Motionfor Partial Summary Judgment as to Jeffrey and Peggy Cain and Six of Their Seven Causes of Action
08/24/2015	DRRB	Respondent's Reply Brief - Reply Brief Re: Response to Joe Baker'sMotion for Partial Summary Judgment as to Jeffrey and Peggy Cain and Six of Their Seven Causes of Action
08/24/2015	DREP	Reply to - Reply to Opposition to Motion forIssuance of Commissions for Out-of-Stat Depositions
08/26/2015	DERR	Errata to - Errata and Reformatted Facts RE: JoeBaker's Opposition to Motion to Strike Joe Baker's Affirmative Defenses or, in the Alternative, For Partial Summary Judgment; Motion to Allow Same
08/26/2015	DREP	Reply to - Sur-Reply RE: Motion to Strike JoeBaker's Affirmative Defenses or, in the Alternative, For Partial Summary Judgment; Motion For Inclusion of Same
08/27/2015	DSUP	Supplement - Supplement to (Renewed) Response to JoeBaker's Motion for Partial Summary Judgment as to Jeffrey and Peggy Cain and Six of Their Seven Causes of Action Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey
08/28/2015	MMOT	Motion - Defendants Price and Shekelford's Motionfor Summary Judgment on Plaintiffs' Remaining Claims and Joinder in Joe Baker's Motion for Order Confirming Plaintiffs' Election of Remedy and for Summary Judgment Thereon Filed by DEF005-Shackelford, Mickey, DEF00
09/02/2015	DOPP	Opposition to Motion - Opposition to Joe Baker's Motion forOrder Confirming Plaintiffs' Election of Remedy and For Summary Judgment Thereon Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/03/2015	DN	Notice of - Notice of Withdrawal RE: Joe Baker'sMotion for Order That Mike Murray be Made a Party Per NRCP 19(a) From the Court Calendar
09/11/2015	DORD	Order - Order of Judgment of Dismissal
09/11/2015	MMOT	Motion - Stipulation and Motion for Judgment ofDismissal Filed by DEF004-Baker, Joe, PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/15/2015	DAFF	Affidavit of - Affidavit of Michael J. McLaughlin inSupport of Motion to Set Aside Default Judgment
09/15/2015	DAFF	Affidavit of - Affidavit of Jeffrey Edwards in Supportof Motion to Set Aside Default Judgment
09/15/2015	MMOT	Motion - Notice of Motion and Motion to Set AsideDefault Judgment; Memorandum of Points and Authorities
09/16/2015	DREP	Reply to - Defendants Price and Shakelford's Replyto Plaintiffs' Opposition to Joe Baker's Motion for Order Confirming Plaintiffs' Election of Remedy and For Summary Judgment Thereon Filed by DEF005-Shackelford, Mickey, OTH003-Price, Richard
09/16/2015	DCOS	Certificate of Service - Certificate of Service
09/16/2015	DORD	Order - Order of Clarification RE: Order of Judgment of Dismissal

Date	Code	Description
09/17/2015	DNEO	Notice of Entry of Order - Notice of Entry of Order of Judgment ofDismissal
09/18/2015	DNEO	Notice of Entry of Order - Notice of Entry of Order ofClarification Re: Order of Judgment of Dismissal
09/28/2015	DOPP	Opposition to Motion - Opposition to Motion to Set AsideDefault Judgment Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/29/2015	DORD	Order - Order Granting Plaintiffs' Motion forIssuance of Commissions for Out-of-State Depositions
10/01/2015	DORD	Order - Order Denying Motion to Add Mike Murrayas a Party
10/02/2015	DOPP	Opposition to Motion - Opposition to Motion for Partial SummaryJudgment Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
10/06/2015	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/07/2015	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/08/2015	DICM	Issued Commission - Issued Commission (Bank of America)Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
10/08/2015	DICM	Issued Commission - Issued Commission (Wells Fargo)Filed by PLT003-Heli Ops International, LLC, , PLT001-Cain, Peggy, PLT002-Cain, Jeffrey
10/08/2015	DROG	Letters Rogatory - Letters RogatoryFiled by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
10/09/2015	DREP	Reply to - Reply to Opposition to Motion to SetAside Default Judgment
10/14/2015	DREP	Reply to - Defendants Price and Shackelford'sReply to Plaintiffs' Opposition to MOtion for Partial Summary Judgment Filed by DEF005-Shackelford, Mickey, OTH003-Price, Richard
10/19/2015	MMOT	Motion - Motion for Partial Summary Judgment onPersonal Jurisdiction Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey
10/19/2015	DSMD	Statement - Statement of Undisputed Material Factsin Support of Motion for Partial Summary Judgment Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey
10/19/2015	DAFF	Affidavit of - Affidavit of Jeffrey Cain
10/20/2015	MJSM	Motion for Summary Judgment - Motion for Partial Summary JudgmentAgainst Defendant Richard Price
10/21/2015	MMOT	Motion - Motion to Continue HearingFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/22/2015	MMOT	Motion - Ex Parte Motion to Shorten Time RE:Motion to Continue Hearing Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/27/2015	DORD	Order - Order Denying ExParte Motion to ShortenTime Re: Motion to Continue Hearing
11/03/2015	DOPP	Opposition to Motion - Defendants Richard Price and MickeyShackelford's Opposition to Plaintiffs' Motion for Partial Summary Judgment on Personal Jurisdiction Filed by OTH003-Price, Richard, DEF005-Shackelford, Mickey
11/05/2015	DORD	Order - Order Granting Summary Judgment as toRichard Price and Mickey Shakelford
11/06/2015	DORD	Order - Order Denying Motion to Set AsideDefault Judgment
11/06/2015	DORD	Order - Order Vacating Trial Date and Motions/Evidentiary Hearing
11/09/2015	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
11/09/2015	DREP	Reply to - Reply to Opposition to Motion forPartial Summary Judgment on Personal Jurisdiction Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
11/10/2015	DREP	Reply to - Reply to Opposition to Motion forPartial Summary Judgment Against Defendant Richard Price Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey
11/12/2015	DOPP	Opposition to Motion - Defendants Richard Price and MickeyShackelfords' Motion to Continue Hearing Filed by DEF005-Shackelford, Mickey, OTH003-Price, Richard
11/12/2015	DOPP	Opposition to Motion - Opposition to Plaintiffs' Motion forPartial Summary Judgment Against Defendant Richard Price

Date	Code	Description
11/13/2015	DMMO	Memorandum Concerning - Defendants Richard Price and MickeyShackelford's Verified Memorandum of Costs Filed by DEF005-Shackelford, Mickey, DEF003-Price, Richard
11/18/2015	DAFF	Affidavit of - Affidavit of Michael L. Matuska inSupport of Opposition to Defendants Richard Price and Mickey Shackelford's Verified Memorandum of Costs and Motion to Retax Costs Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
11/18/2015	DOPP	Opposition to Motion - Opposition to Motion to Retax CostsFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
11/25/2015	MMOT	Motion - Defendant's Price and Shackelford'sMotion for Attorney's Fees Filed by DEF005-Shackelford, Mickey, DEF003-Price, Richard
12/01/2015	DCAP	Case Appeal Statement - Case Appeal StatementFiled by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
12/01/2015	DNOA	Notice of Appeal - Notice of AppealFiled by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
12/09/2015	DOPP	Opposition to Motion - Defendants Richard Price and MickeyShackelford's Opposition to Plaintiffs' Motion to Retax Costs Filed by DEF005-Shackelford, Mickey, OTH003-Price, Richard
12/10/2015	DREP	Reply to - Reply to Opposition to Motion to Motionto Retax Costs Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
12/11/2015	DOPT	Opposition to - Opposition To Motion for Attorney's FeesFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
12/11/2015	DRFD	Receipt for Documents (Supreme Court) - Receipt for Documents (Supreme Court)
12/18/2015	DREP	Reply to - Defendants Price and Shackelford'sReply to Plaintiffs' Opposition to Motion for Attorney's Fees Filed by OTH003-Price, Richard, DEF005-Shackelford, Mickey
12/22/2015	DREP	Reply to - Sur-ReplyFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
01/07/2016	MMOT	Motion - Defendants' Priceand Shackelford'sMotion to Strike Plaintiffs' Sur-Reply Filed by DEF005-Shackelford, Mickey, OTH003-Price, Richard
01/12/2016	DOPP	Opposition to Motion - Opposition to Motion to Strike Sur-Reply Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
01/25/2016	DOPP	Opposition to Motion - Opposition to Motion to Quash Subpoenasfor Protective Order, and for Sanctions Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
01/28/2016	MMOT	Motion - Defendants Richard Price and MickeyShackelford's Motion to Quash Subpoenas, for Protective Order and for Sanctions Filed by DEF005-Shackelford, Mickey, OTH003-Price, Richard
02/01/2016	DREP	Reply to - Defendants Price and Shackelford'sReply to Plaintiffs' Opposition to Motion to Quash Subpoenas, for Protective Order and for Sanctions Filed by DEF003-Price, Richard, DEF005-Shackelford, Mickey
02/05/2016	DORD	Order - Order Granting Attorney's Fees toDefendants Price and Shackelford
02/05/2016	DORD	Order - Order Granting Motion to StrikeSur-Reply
02/10/2016	DORD	Order - Order Awarding Defendant Price andShackelford's Costs and Denying Plaintiffs' Motion to Retax Costs
02/10/2016	DORD	Order - Order Granting Motion to QuashSubpoenas, for Protective Order and for Sanctions
02/12/2016	DNEO	Notice of Entry of Order - Notice of Entry of Order
02/12/2016	DNEO	Notice of Entry of Order - Notice of Entry of Order
02/17/2016	DNEO	Notice of Entry of Order - Notice of Entry of Order
02/17/2016	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by DEF005-Shackelford, Mickey, OTH003-Price, Richard
02/25/2016	DNOA	Notice of Appeal - Amended and Supplemental Notice ofAppeal Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,

Date	Code	Description
02/25/2016	DCAP	Case Appeal Statement - Amended and Supplemental Case AppealStatement Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
03/07/2016	DRFD	Receipt for Documents (Supreme Court) - Receipt for Documents (Supreme Court)
03/18/2016	DORD	Order - Order Returning Jury Fees
03/22/2016	DORD	Order - Order for Release of Jury Fees Paid byDefendants D.R. Rawson and Margaret Rawson
04/22/2016	DOPP	Opposition to Motion - Opposition to Defendants Price andShackelford's Motion for Attorney's Fees as Sanctions Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
04/27/2016	MMOT	Motion - Defendants Price and Shackelford'sMotion for Attorney's Fees as a Sanction (NRCP 11) Filed by DEF005-Shackelford, Mickey, OTH003-Price, Richard
04/28/2016	DIRO	Auto Reopen (not for manual use)
05/04/2016	DREP	Reply to - Defendants Price and Shackelford'sReply to Plaintiffs' Opposition to Motion for Attorney's Fees as a Sanction (NRCP11)
07/01/2016	DORD	Order - Order Granting Attorney's Fees as aSanction (NRCP 11)
07/07/2016	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by DEF005-Shackelford, Mickey, OTH003-Price, Richard
07/18/2016	DNOA	Notice of Appeal - Supplemental Notice of AppealFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey
07/18/2016	DCAP	Case Appeal Statement - Supplemental Case Appeal StatementFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey
07/27/2016	DRFD	Receipt for Documents (Supreme Court) - Receipt for Documents (Supreme Court)
09/06/2016	DSUP	Supplement - Plaintiff's Supplemental Reply toOpposition to Motion for Partial Summary Judgment on Personal Jurisdiction Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/24/2016	DRFD	Receipt for Documents (Supreme Court) - Receipt for Documents (Supreme Court)
11/23/2016	DIRC	Auto Reclose (not for manual use)
11/23/2016	DOSC	Order to Show Cause - Order to Show Cause - SUPREME COURT
12/05/2016	WEX	Writ of Execution - Writ of Execution - Issued (MargaretRawson) Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
12/06/2016	WEX	Writ of Execution - Writ of Execution (Issued Las Vegas)Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
12/08/2016	DAFF	Affidavit of - Affidavit of Michael L. Matuska inSupport of Motion to Turn Over Funds; Motion to Compel; and for Other Relief Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
12/08/2016	DIRO	Auto Reopen (not for manual use)
12/08/2016	MMOT	Motion - ExParte Motion to Shorten Time Re:Motion to Turn Over Funds; and for Temporary Restraining Order Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
12/08/2016	DIRO	Auto Reopen (not for manual use)
12/08/2016	MMOT	Motion - Motion to Turn Over Funds; Motion toCompel; and for Other Relief Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
12/09/2016	DORD	Order - Order Granting ExParte Motion toShorten Time and for Temporary Restraining Order
12/12/2016	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
12/20/2016	DOPP	Opposition to Motion - Margaret Rawson's Opposition to Motionto Turn Over Funds; Motion to Compel; and for Other Relief
12/28/2016	DCOS	Certificate of Service - Certificate of ServiceFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,

Date	Code	Description
12/30/2016	DSTI	Stipulation - Stipulation to Continue Hearing onMotion to Turn Over Funds; Motion to Compel; and For Other Relief Filed by DEF001-Rawson, D.R., DEF002-C4 Worldwide, Inc., , DEF003-Price, Richard, DEF004-Baker, Joe, DEF005-Shackelford, Mickey, DEF006-Kavanagh, Michael
01/03/2017	DORD	Order - Order Continuing Hearing
01/04/2017	DREP	Reply to - Reply to Opposition to Motion to TurnOver Funds; Motion to Compel; and for Other Relief Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
01/05/2017	DIRO	Auto Reopen (not for manual use)
01/05/2017	MMOT	Motion - Second Motion for Ex Parte TemporaryRestraining Order and Motion to Turn Over Funds Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
01/06/2017	DMIS	Misc. Document - Margaret Rawson's Claim of Exemption
01/10/2017	DNEO	Notice of Entry of Order - Notice of Entry of Order
01/11/2017	DORD	Order - Order Granting Second Motion forTemporary Restraining Order
01/13/2017	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
01/18/2017	DREP	Reply to - Reply to Margaret Rawson's Oppositionto Second Motion to Turn Over Funds Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
01/18/2017	DOBJ	Objection to - Objection to Claim of ExemptionFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
01/23/2017	DOPP	Opposition to Motion - Margaret Rawson's Opposition to SecondMotion for Ex Parte Temporary Restraining Order and Motion to Turn Over Funds
01/24/2017	DORD	Order - Order Granting Motion to Turn OverFunds
01/27/2017	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
04/25/2017	WEX	Writ of Execution - Writ of Execution (Filed)Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
04/25/2017	WEX	Writ of Execution - Writ of Execution (Issued)Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
07/10/2017	DIRO	Auto Reopen (not for manual use)
07/10/2017	MMOT	Motion - Margaret Rawson's Motion to Set AsideVoid Joint Debtor Judgment
07/14/2017	DCOS	Certificate of Service - Certificate of ServiceFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
07/14/2017	DROV	Record on Review - Record On Review Volume 2Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
07/14/2017	DROV	Record on Review - Record On Review Volume 1Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
07/14/2017	DOPP	Opposition to Motion - Opposition to Margaret Rawson's Motionto Set Aside Void Joint Debtor Judgment Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
07/14/2017	DIRO	Auto Reopen (not for manual use)
07/14/2017	MMOT	Motion - Third Motion for Ex Parte TemporaryRestraining Order and Motion to Turn Over Funds; and Motion to Compel Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
07/24/2017	MMOT	Motion - Margaret Rawson's Motion to Strike/Opposition to Cains' Third Motion for Ex Parte Temporary Restraining Order and Cains' Motion to Turn Over Funds and Cains' Motion to Compel
07/25/2017	DIRO	Auto Reopen (not for manual use)
07/26/2017	DREP	Reply to - Margaret Rawson's Reply to Opposition toMotion to Set Aside Void Joint Debtor Judgment
07/26/2017	DN	Notice of - Notice in Lieu of Remittitur (SupremeCourt)
07/27/2017	MMOT	Motion - Objection to Margaret Rawson's Claim ofExemption (NRS 21.075) and Motion to Strike and Motion for Hearing to Determine Exemption Filed by OTH003-Price, Richard, PLT001-Cain, Peggy, PLT002-Cain,

Date	Code	Description
07/28/2017	MMOT	Motion - Margaret Rawson's Motion to QuashService of Writs of Execution and Garnishment on Attorney David A. Tilem
07/28/2017	DOPP	Opposition to Motion - Opposition to Margaret Rawson's Motionto Stay Enforcement of Judgment Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
07/28/2017	DIRO	Auto Reopen (not for manual use)
07/31/2017	DRES	Response to - Response to Margaret Rawson's Motion toQuash Service of Writs of Execution and Garnishment on Attorney David A. Tilem Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
07/31/2017	MMOT	Motion - Motion for Leave to File Sur-Reply toMargaret Rawson?s Reply to Opposition to Motion to Set Aside Void Joint Debtor Judgment Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
07/31/2017	DIRO	Auto Reopen (not for manual use)
07/31/2017	DIRO	Auto Reopen (not for manual use)
08/01/2017	DIRO	Auto Reopen (not for manual use)
08/02/2017	DMIS	Misc. Document - Margaret Rawson's Claim of Exemptionfrom Exexcution
08/02/2017	DBRF	Brief of - Margaret Rawson's Brief in Support ofClaim of Exemption from Execution
08/04/2017	DRES	Response to - Response to Margaret Rawson's Brief inSupport of Claim of Exemption Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
08/07/2017	DOPT	Opposition to - Opposition To Motion for Leave to FileSur-Reply to Margaret Rawson's Reply to Opposition to Motion to Set Aside Joint Debtor Judgment
08/07/2017	DREP	Reply to - Margaret Rawson's Reply to Opposition toStay Enforcement
08/09/2017	DREP	Reply to - Reply to Opposition to Motion for Leaveto File Sur-Reply to Margaret Rawson's Reply to Opposiiton to Motion to Set Aside Void Joint Debtor Judgment Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
08/18/2017	DRSU	Request for Submission - Request for SubmissionFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
08/25/2017	DIRO	Auto Reopen (not for manual use)
08/25/2017	MMOT	Motion - Margaret Rawson's Exparte Motion forRelease of Seized Annuity
08/25/2017	DIRO	Auto Reopen (not for manual use)
08/25/2017	MMOT	Motion - Motion to Strike the Cains' Request forSubmission
08/30/2017	DOPT	Opposition to - Opposition To Margaret Rawson's Motionto Strike the Cain's Request for Submission Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
08/30/2017	DOPT	Opposition to - Opposition To Margaret Rawson's Ex ParteMotion for Release of Seized Annuity (NRS 21.112(4)) Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/15/2017	DIRC	Auto Reclose (not for manual use)
09/15/2017	DORD	Order - Order Regarding Pending Motions
09/15/2017	DIRC	Auto Reclose (not for manual use)
09/15/2017	DORD	Order - Order Granting Third Motion forTemporary Restraining Order
09/15/2017	DIRC	Auto Reclose (not for manual use)
09/15/2017	DORD	Order - Order Denying Stay and RequiringCovered Assets to be Held in Trust
09/15/2017	DREP	Reply to - Sur-replyFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/22/2017	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/22/2017	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/22/2017	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,

Date	Code	Description
12/04/2017	MMOT	Motion - Motion for Order to Show Cause RE:Contempt Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
12/05/2017	DIRO	Auto Reopen (not for manual use)
12/11/2017	DOPT	Opposition to - Margaret Rawson's Opposition To Motionfor Order to Show Cause RE: Contempt
02/05/2018	DN	Notice of - Notice of Withdraw of Motion for Orderto Show Cause RE: Contempt Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
04/13/2018	DOPN	Opinion - Supreme Court Opinion
05/07/2018	DMMO	Memorandum Concerning - Verified Memorandum of Costs on AppealFiled by DEF002-C4 Worldwide, Inc., , PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
05/07/2018	MMOT	Motion - Motion for Attorney FeesFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
05/08/2018	DIRO	Auto Reopen (not for manual use)
05/09/2018	DCLC	Clerk's Certificate - Clerk's Certificate
05/09/2018	DOPN	Opinion - Opinion
05/09/2018	DRMT	Remittitur - Remittitur
05/15/2018	DRPT	Report of - Report on Pending MattersFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
05/17/2018	DOPP	Opposition to Motion - Defendants Richard Price and MickeyShackelford's Opposition to Plaintiffs' Motion for Attorney Fees Filed by DEF003-Price, Richard, DEF005-Shackelford, Mickey
05/23/2018	DREP	Reply to - Reply to Opposition to Motion forAttorney Fees Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
06/05/2018	WEX	Writ of Execution - Writ of Execution filedFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
06/18/2018	DORD	Order - Order
06/18/2018	DORD	Order - Order Denying Motion for Attorney Fees
06/25/2018	DNEO	Notice of Entry of Order - Notice of Entry of Order
06/28/2018	DCAP	Case Appeal Statement - Case Appeal StatementFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
06/28/2018	DNOA	Notice of Appeal - Notice of AppealFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
07/17/2018	DRFD	Receipt for Documents (Supreme Court) - Receipt for Documents (Supreme Court)
08/29/2018	DIRO	Auto Reopen (not for manual use)
08/29/2018	MMOT	Motion - Margaret Rawson's Motion forRestitution of Property Seized on Void Judgment
09/10/2018	DSTI	Stipulation - StipulationFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
09/10/2018	DERR	Errata to - Errata to Margaret Rawson's Motion forRestitution of Property Seized on Void Judgment
09/25/2018	DTRN	Transcript of Proceedings - Transcript of Proceedings (Hearing onClaim of Exemption 10/7/13)
09/25/2018	DSTI	Stipulation - StipulationFiled by PLT001-Cain, Peggy, PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, OTH001-Rawson, Margaret L.
09/26/2018	DORD	Order - Order
09/27/2018	DIRC	Auto Reclose (not for manual use)
10/02/2018	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/25/2018	DRCD	Record of - Record on Review Volume 3Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
10/25/2018	DRCD	Record of - Record on Review Volume 4Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
10/25/2018	DOPP	Opposition to Motion - Opposition to Margaret Rawson's Motionfor Restitution of Property Seized on Void Judgment Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
11/07/2018	DRSU	Request for Submission - Request for SubmissionFiled by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy

Date	Code	Description
11/07/2018	DREP	Reply to - Reply to Opposition to Motion forPartial Summary Judgment Against Defendant Richard Price Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey, PLT001-Cain, Peggy
11/08/2018	DSTI	Stipulation - StipulationFiled by OTH001-Rawson, Margaret L., PLT002-Cain, Jeffrey, PLT001-Cain, Peggy, PLT003-Heli Ops International, LLC,
11/13/2018	DIRC	Auto Reclose (not for manual use)
11/13/2018	DORD	Order - Order Granting Costs on Appeal
11/13/2018	DIRC	Auto Reclose (not for manual use)
11/13/2018	DORD	Order - Order
11/26/2018	DNEO	Notice of Entry of Order - Notice of Entry of Order
12/14/2018	DREP	Reply to - Margaret Rawson's Reply to Opposition toMotion for Restitution of Property Seized on Void Judgment
12/24/2018	DRSU	Request for Submission - Request for Submission of Motion
12/31/2018	DIRO	Auto Reopen (not for manual use)
12/31/2018	MMOT	Motion - Motion to Strike Margaret Rawson's Replyto Opposition to Motion for Restitution of Property Seized on Void Judgment, or in the Alternative, Motion for Leave to File Sur-Reply Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-
12/31/2018	DREP	Reply to - Sur-Reply in Response to MargaretRawson's Reply to Opposition to Motion for Restitution of Property Seized on Void Judgment Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
01/16/2019	DOPP	Opposition to Motion - Margaret Rawson's Opposition to Cains'Motion to Strike Reply/Alternatively Opposition to Motion for Leave to File Sur-Reply
01/22/2019	DREQ	Request - Request for TranscriptFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
02/15/2019	DAFF	Affidavit of - Affidavit of Renewal of Judgment
02/22/2019	DCOS	Certificate of Service - Certificate of Service
03/04/2019	DCOS	Certificate of Service - Amended Certificate of Service
04/11/2019	DNCA	Notice of Change of Address - Notice of Change of Address
05/30/2019	MMOT	Motion - Motion for Extension of TimeFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
05/31/2019	DIRO	Auto Reopen (not for manual use)
06/05/2019	DCOS	Certificate of Service - Amended Certificate of ServiceFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
06/11/2019	DORD	Order - Order Reinstating Briefing (Supreme Ct.)
06/12/2019	DIRC	Auto Reclose (not for manual use)
06/13/2019	DOPT	Opposition to - Defendants Richard Price and MickeyShackelford's Opposition to Plaintiffs' Motion for Extension of Time; Request for Order Compelling Payment of Attorney's Fees; and Request for Leave of Court to File Motion for Attorney's Fees
06/18/2019	DREP	Reply to - Reply to Opposition to Motion forExtension of Time Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
06/27/2019	DORD	Order - Order Setting Hearing
07/03/2019	DORD	Order - Order Setting Hearing
07/17/2019	DORD	Order - Order Denying Plaintiffs' Motionfor Extension of Time
07/26/2019	DN	Notice of - Notice of PaymentFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
07/31/2019	MMOT	Motion - Defendants Price and Shackelford'sMotion for Attorney's Fees as a Sanction (NRCP 11) Filed by DEF003-Price, Richard, DEF004-Baker, Joe
08/01/2019	DIRO	Auto Reopen (not for manual use)
08/13/2019	DOPP	Opposition to Motion - Plaintiffs' Opposition to DefendantsPrice and Shackelford's Motion for Attorney;s Fees as a Sanction
08/19/2019	DREP	Reply to - Defendants Richard Price and MickeyShackelford's Reply to Plaintiffs' Opposition to Motion for Attorney's Fees as a Sanction(NRCP 11) Filed by DEF005-Shackelford, Mickey, DEF004-Baker, Joe, DEF003-Price, Richard
09/09/2019	DSTI	Stipulation - Stipulation to Continue Hearing onMargaret Rawson's Motion to for Restitution of Property Seized on Void Judgment Filed by PLT003-Heli Ops International, LLC, , PLT002-Cain, Jeffrey

Date	Code	Description
09/11/2019	DIRC	Auto Reclose (not for manual use)
09/11/2019	DORD	Order - Order Re: Stipulation to ContinueHearing on Motion for Restitution of Property Seized on Void Judgment
09/23/2019	DIRO	Auto Reopen (not for manual use)
09/23/2019	MMOT	Motion - Motion to Dismiss With Prejudice
09/23/2019	DAIS	Affidavit in Support of - Affidavit of Jeffrey Cain in Support ofMotion to Dismiss
09/27/2019	DSTI	Stipulation - StipulationFiled by PLT001-Cain, Peggy, PLT003-Heli Ops International, LLC, , OTH001-Rawson, Margaret L.
09/30/2019	DORD	Order - Order Approving Stipulation to DismissMargaret Rawson
10/03/2019	DOPT	Opposition to - Defendants Richard Price and MickeyShackelford's Opposition to Plaintiffs' Motion to Dismiss with Prejudice Filed by DEF005-Shackelford, Mickey, OTH003-Price, Richard
10/07/2019	DNEO	Notice of Entry of Order - Notice of Entry of OrderFiled by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/07/2019	DORD	Order - Order Dismissing Appeal
10/08/2019	DIRC	Auto Reclose (not for manual use)
10/11/2019	DAFF	Affidavit of - Affidavit of Michael L. Matuska inSupport of Reply to Opposition to Motion to Dismiss with Prejudice Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
10/11/2019	DREP	Reply to - Reply to Opposition to Motion to Dismisswith Prejudice Filed by PLT001-Cain, Peggy, PLT002-Cain, Jeffrey, PLT003-Heli Ops International, LLC,
11/01/2019	DORD	Order - Dismissing Third Party Amended Complaint With Prejudice
11/01/2019	DORD	Order - Determining Amount of Attorney's Fees to be Paid by Plaintiff's and Directing Payment Thereof
11/07/2019	DNEO	Notice of Entry of Order
11/07/2019	DNEO	Notice of Entry of Order
11/07/2019	DN	Notice of - Payment
12/06/2019	DNOA	Notice of Appeal
12/06/2019	DCAP	Case Appeal Statement
12/13/2019	DCAP	Case Appeal Statement
12/13/2019	DN	Notice of - Cross Appeal

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Case No. 11-CV-0296

Dept. No. II

IN THE NINTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF DOUGLAS

PEGGY CAIN, an individual; JEFFREY CAIN, an individual; and HELI OPS INTERNATIONAL, LLC, and Oregon limited liability company,

Plaintiffs,

vs.

D.R. RAWSON, an individual; C4 WORLDWIDE, INC., a Nevada corporation; RICHARD PRICE, an individual; JOE BAKER, an individual; MICKEY SHACKELFORD, an individual; MICHAEL K. KAVANAGH, an individual; JEFFREY EDWARDS, an individual; and DOES 1 through 10, inclusive,

Defendants.

ORDER DETERMINING AMOUNT OF ATTORNEY'S FEES TO BE PAID BY PLAINTIFFS AND DIRECTING PAYMENT THEREOF

On July 17, 2019, the Court entered an *Order Denying Plaintiffs' Motion for Extension of Time*. The Court awarded Defendants Price and Shackelford reasonable attorney's fees, as a sanction, for their efforts in opposition the motion. *Id.* at p. 5. The Courts findings are not repeated herein.

Defendants were ordered to file and serve documentation in support of the amount of fees requested. *Id.* Defendants did so in a brief styled *Motion for Attorney's Fees as a Sanction (NRCP*

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

11). Plaintiffs filed an opposition and Defendants filed a reply.

Defendants support the amount of fees requested by affidavit and billing statements. Plaintiffs submit that some of the billing entries were for efforts unrelated to Defendants' opposition to the motion in question. Defendants reply that to the extent time spent by counsel was tangentially related, the attorney's fees are justified as a fine.

The Court has considered the factors supplied by *Brunzell v. Golden Gate Nat'l Bank*, 85 Nev. 345, 349 (1969) in evaluating the amount of fees requested by Defendants. Counsel for Defendants advocated against the underlying motion by filing a seven-page opposition together with an affidavit of counsel. Counsel's efforts were of sufficient character and quality to successfully defeat the motion. Some of the billed time was, however, only tangentially related to opposing the motion. Defendants did not request a fine and a fine was not assessed by the Court.

The Court finds that billing entries for 6/5/2019, 6/10/2019, 6/11/2019 and 7/18/2019, for both Defendants Price and Shackelford, best exemplify the time directly spent on opposing the motion. The amount of time was reasonable as was the hourly rate given the qualifications and experience of counsel.

Good cause appearing,

IT IS HEREBY ORDERED that the amount of attorney's fees payable by Plaintiffs to Defendants Price and Shackelford is set at $2,100.00. Plaintiffs shall remit said amount to counsel for Defendants Price and Shackelford by November 18, 2019, at 1:30 p.m.

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THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

IT IS FURTHER ORDERED that Plaintiffs shall appear before the Court for a status hearing on November 18, 2019, at 1:30 p.m. If, prior to the hearing, Plaintiffs comply with this order and file proof of the same with the Court, the hearing will be vacated.

DATED this 1st day of ~~October~~ November, 2019.

THOMAS W. GREGORY
DISTRICT JUDGE

Copies served by mail on ~~October~~ November 1, 2019, addressed to:

Michael Matuska, Esq.
2310 South Carson Street, #6
Carson City, Nevada 89701

Mark Forsberg, Esq.
504 E. Musser Street, Suite 202
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Andrea Domínguez for
Erin C. Plante

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
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MINDEN, NV 89423

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Case No. 11-CV-0296

Dept. No. II

IN THE NINTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF DOUGLAS

PEGGY CAIN, an individual; JEFFREY CAIN, an individual; and HELI OPS INTERNATIONAL, LLC, and Oregon limited liability company,

Plaintiffs,

vs.

D.R. RAWSON, an individual; C4 WORLDWIDE, INC., a Nevada corporation; RICHARD PRICE, an individual; JOE BAKER, an individual; MICKEY SHACKELFORD, an individual; MICHAEL K. KAVANAGH, an individual; JEFFREY EDWARDS, an individual; and DOES 1 through 10, inclusive,

Defendants.

_____/

ORDER DENYING PLAINTIFFS' MOTION FOR EXTENSION OF TIME

THIS MATTER comes before the Court on Plaintiffs' *Motion for Extension of Time*, filed May 30, 2019. The motion has been fully briefed and is ripe for consideration. Good cause appearing, the Court finds and orders as follows:

Procedural and Factual History

On September 24, 2014, the Court issued a *Scheduling* Order designating July 17, 2015 as the discovery deadline. The Scheduling Order provides, "**No extensions or modifications shall**

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MINDEN, NV 89423

be permitted, except by Order of the Court. NRCP 16(b)(3)." *Id.* at p. 3 (no emphasis added).

On December 26, 2014, Plaintiffs requested that Defendants Price and Shackelford produce "any and all Form W2s, Form 1099's and any and all personal tax returns for tax years 2009 and 2010." Price and Shackelford objected. Plaintiffs brought a motion to compel. The motion was denied. Plaintiffs successfully appealed. Remittitur issued on May 7, 2018. Post-appeal, Price and Shackelford produced their 2009 and 2010 tax returns.

On April 26, 2019, Plaintiffs propounded a discovery request on Price and Shackelford to "provide any and all Form W2s, Form 1099s and any and all personal tax returns for tax years 2011 to the present." On or about May 28, 2019, counsel for Defendants Price and Shackelford conferred with counsel for Plaintiffs and voiced an objection.

On May 30, 2019, Plaintiffs filed the pending *Motion for Extension of Time*. Plaintiffs "move pursuant to DCR 17 and NJDCR 10 for an extension of time to allow the additional discovery permitted by *Cain v. Price*, 134 Nev.Adv.Op. 26 (April 12, 2018). Plaintiffs attached as exhibits the April 26, 2019 requests for production noted above. Citing NRCP 26(e), Plaintiffs also claim Defendants have a duty to provide the documentation as a supplement to documents already provided in reference to 2009 and 2010 taxes.

Defendants Price and Shackelford argue that DCR 17 and NJDCR 10 are inapplicable; they have fully complied with the order of the Nevada Supreme Court by producing their 2009 and 2010 tax information; their tax information from 2011 onward should be

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

protected; that NRCP 26(e) does not require them to supplement the previously provided 2009 and 2010 tax information with tax information for 2011 onward; for an award of attorney's fees; and for enforcement of the Court's July 1, 2016 order imposing sanctions on Plaintiffs.

Discussion

The authorities relied upon by Plaintiffs, DCR 17 and NJDCR 10, are plainly inapplicable to Plaintiffs request for an extension of time to allow additional discovery. Plaintiffs' motion stands to be denied on this basis alone.

Although not cited by Plaintiffs, the Court has considered whether Plaintiffs have demonstrated good cause to extend the discovery deadline pursuant to NRCP 16(b)(4). In 2014, Plaintiffs specifically requested tax information for the years 2009 and 2010. Plaintiffs did not ask for tax information for any other year, including 2011-2014, or even 2009 "to present". Plaintiffs did not move for modification of the *Scheduling Order* prior to the discovery deadline and do not state good cause, let alone any cause, as to why they failed to do so. Plaintiffs waited until May 30, 2019 to request an extension. Plaintiffs' request comes grossly after the close of discovery and one year after remittitur. Inexplicably, Plaintiffs served Defendants with the extremely delinquent additional discovery request without court authorization and before they even filed the motion seeking an extension. Plaintiffs conduct is in direct violation of NRCP 16 and the *Scheduling Order*. Plaintiffs have not demonstrated good cause to extend the discovery deadline. In accord, the post-discovery deadline requests propounded by Plaintiffs, as

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

reflected in the exhibits to the motion, were improperly served and are ineffectual.

After framing their request for Defendants' 2011 to present tax information as additional discovery, for which they seek an extension of the discovery deadline, Plaintiffs pivot and argue that Defendants are required to provide the documentation pursuant to NRCP 26(e) as being supplemental to the 2009 and 2010 tax documents already provided. Plaintiffs do not claim that the produced 2009 and 2010 tax documents are incomplete or incorrect. NRCP 26(e). Plaintiffs do not state how a specific request for 2009 and 2010 tax documents, made in 2014, requires Defendants to produce their tax information for 2011-present. NRCP 26(e) is inapplicable.

The Nevada Supreme Court held that Defendants are compelled to produce their 2009-2010 tax information in response to Plaintiffs specific and timely request. Defendants have complied. The Nevada Supreme Court did not order an extension of the discovery deadline or order Defendants to produce 2011-present tax documentation. The Nevada Supreme Court did not give Plaintiffs *carte blanche* to violate court rules and procedure and their affirmance of the July 1, 2016 *Order Granting Attorney's Fees as a Sanction (NRCP 11)*, strongly suggests otherwise. Therein, Plaintiffs were ordered to pay Defendants Price and Shackelford $9,514.00 within 30 days. Three years later, and one year post-remittitur, Plaintiffs have yet to pay.

There are multiple authorities warranting another monetary sanction against Plaintiffs. These include NRCP 26, NRCP 16, NJDCR 23, NRCP 16(f)(1)(C), NRCP 37, NRCP 11 and NRS 7.085. By

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

propounding an extremely tardy and over burdensome discovery request for personal information and subsequently bringing a frivolous motion to extend the discovery deadline, Plaintiffs have demonstrated an improper purpose. The Court is concerned that prior monetary sanctions have not been paid and have not been effective in deterring Plaintiffs' disregard for court rules and procedure. Further violations may be met with sanctions beyond monetary sanctions, such as those provided in NRCP 37(b)(1).

IT IS HEREBY ORDERED that Plaintiffs' *Motion for Extension of Time* is **DENIED**.

IT IS FURTHER ORDERED that Defendants are awarded reasonable attorney's fees for their efforts to oppose the motion. Defendants shall file and serve documentation in support of the amount of fees requested within 10 judicial days of this order.

IT IS FURTHER ORDERED that Plaintiffs shall appear before the Court on July 29, 2019 at 1:30 p.m., to show cause as to why they should not be held in contempt of court for violating the July 1, 2016 *Order Granting Attorney's Fees as a Sanction (NRCP 11)*. Contempt is punishable by up to 25 days in jail and a fine of up to $500. If, prior to the hearing, Plaintiffs comply with the 2016 *Order Granting Attorney's Fees as a Sanction (NRCP 11)* and file proof of compliance, the hearing will be vacated.

DATED this 17th day of July, 2019.

THOMAS W. GREGORY
DISTRICT JUDGE

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

Copies served by mail on July 17th, 2019, addressed to:

Michael Matuska, Esq.
2310 South Carson Street, #6
Carson City, Nevada 89701

Mark Forsberg, Esq.
504 Musser Street, Suite 302
Carson City, Nevada 89701

Erin C. Plante

Erin C. Plante

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

Case No. 11-CV-0296

Dept. No. II

RECEIVED
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Douglas County
District Court Clerk

2018 JUN 18 AM 11:29
CLERK

IN THE NINTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF DOUGLAS

PEGGY CAIN, an individual; JEFFREY CAIN, an individual; and HELI OPS INTERNATIONAL, LLC, and Oregon limited liability company,

Plaintiffs,

vs.

D.R. RAWSON, an individual; C4 WORLDWIDE, INC., a Nevada corporation; RICHARD PRICE, an individual; JOE BAKER, an individual; MICKEY SHACKELFORD, an individual; MICHAEL K. KAVANAGH, an individual; JEFFREY EDWARDS, an individual; and DOES 1 through 10, inclusive,

Defendants.

ORDER DENYING MOTION FOR ATTORNEY FEES

THIS MATTER comes before the Court on Plaintiffs' *Motion for Attorney Fees*, filed May 7, 2018. Defendants Price and Schackelford filed an *Opposition to Plaintiffs' Motion for Attorney Fees* on May 17, 2018. Plaintiffs filed a *Reply to Motion for Attorney Fees* on May 23, 2018.

The Court having considered the briefs and the record herein, finds and orders as follows:

On March 9, 2015, Plaintiffs filed a motion to compel

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

Defendants Price and Schackelford ("Defendants") to produce their personal W-2's, form 1099's and any and all personal tax returns for the years 2009 and 2010. Defendant's opposed, contending Plaintiffs could not establish the factual predicate for discovering confidential income tax information. *Hetter v. District Court*, 110 Nev. 513 (1994). The Court agreed with Defendants and denied Plaintiffs' motion to compel.

Plaintiffs appealed. The Nevada Supreme Court reversed, finding that Plaintiffs sufficiently established the factual predicate. *Cain v. Price*, 134 Nev.Adv.Op 26, p. 10 (2018). "While the evidence of the factual predicate might not be "clear and convincing," it does constitute "some factual basis." *Id.*

Citing NRCP 37, Plaintiffs request attorney's fees for litigating the motion to compel at the district court level and on appeal. Plaintiffs specifically request "$4,375 in connection with their Third Motion to Compel in District Court," and $127,310 "for the entire combined cost of the appeal." Defendants are opposed.

When granting a motion to compel, a court shall require the opposing party to pay "reasonable expenses incurred in making the motion, including attorney's fees, unless the court finds…that the opposing party's nondisclosure, response or objection was substantially justified, or that other circumstances make and award of expenses unjust." NRCP 37(4)(A).

The information requested by Plaintiffs carries particular legal protection. Specifically:

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///

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

> Because of the policy considerations of protecting taxpayer privacy and encouraging the filing of full and accurate tax returns, both state and federal courts have subjected discovery requests for income tax returns to a heightened scrutiny, especially in the context of requests for punitive damages.

Hetter v. District Court, 110 Nev. 513, 519 (1994).

> While this state [Nevada] does not recognize a privilege for tax returns or necessarily require that liability for punitive damages be established before discovery of financial condition, public policy suggests that tax returns or financial status not be had for the mere asking. Claims for punitive damages can be asserted with ease and can result in abuse and harassment if their assertion alone entitles plaintiff to financial discovery. *See*, Moran v. International Playtex, Inc., 480 N.Y.S.2d 6, 8 (N.Y. App. Div. 1984). We hold that before tax returns or financial records are discoverable on the issue of punitive damages, the plaintiff must demonstrate some factual basis for its punitive damage claim.

Id. at 520; *see also*, *Cain v. Price*, 134 Nev.Adv.Op 26, p. 10 (2018).

Since the information at issue cannot "be had for the mere asking," Defendants were substantially justified in denying disclosure pending judicial determination of the factual predicate. NRCP 37(4)(A). This is particularly so given the small quantum of evidence supporting the factual predicate. It would be unjust to award attorney's fees to Plaintiffs under these circumstances. *Id.* Also, the law does not provide for an award of attorney's fees incurred on appeal. *Bd. of Gallery of History v. Datecs Corp.*, 116 Nev. 286, 288 (2000).

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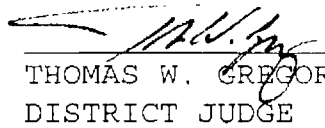
THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

Good cause appearing,

IT IS HEREBY ORDERED that Plaintiffs' *Motion for Attorney Fees* is **DENIED.**

DATED this 18th day of June, 2018.

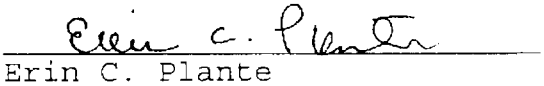


THOMAS W. GREGORY
DISTRICT JUDGE

Copies served by mail on June 18th, 2018, addressed to:

Michael Matuska, Esq.
2310 South Carson Street, Suite 6
Carson City, Nevada 89701

Mark R. Forsberg, Esq.
504 E. Musser Street, Suite 302
Carson City, Nevada 89701



Erin C. Plante

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

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CASE NO.: 11-CV-0296

DEPT. NO.: II

This document does not contain personal information of any person.

THE NINTH JUDICIAL DISTRICT COURT OF NEVADA

IN AND FOR THE COUNTY OF DOUGLAS

PEGGY CAIN, an individual; JEFFREY CAIN, an individual; and HELI OPS INTERNATIONAL, LLC, an Oregon limited liability company, Plaintiffs, v. D.R. RAWSON, an individual; C4 WORLDWIDE, INC., a Nevada corporation; RICHARD PRICE, an individual; JOE BAKER, an individual; MICKEY SHACKELFORD, an individual; MICHAEL K. KAVANAGH, an individual; and JEFFREY EDWARDS, an individual; MARGARET RAWSON, an individual; and DOES 1 – 10, inclusive, Defendants.	**NOTICE OF ENTRY OF ORDER**

PLEASE TAKE NOTICE that on November 1, 2019, the Court entered its *ORDER DETERMINING AMOUNT OF ATTORNEY'S FEES TO BE PAID BY PLAINTIFFS AND DIRECTING PAYMENT THEREOF* in the above-entitled matter, a copy of which is attached hereto as ***Exhibit 1***.

Dated this 6th day of November 2019.

MATUSKA LAW OFFICES, LTD.

By: _____

MICHAEL L. MATUSKA, SBN 5711
2310 South Carson Street, Suite 6
Carson City, NV 89701
Attorneys for Plaintiffs

MATUSKA LAW OFFICES, LTD.
2310 South Carson Street, Suite 6
Carson City NV 89701
(775) 350-7220

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of Matuska Law Offices, Ltd., and that on the 6th day of November 2019, I served a true and correct copy of the preceding document entitled **NOTICE OF ENTRY OF ORDER** as follows:

Mark Forsberg, Esq.
504 E. Musser Street, Suite 202
Carson City, NV 89701

Attorneys for Defendants Richard Price and Mickey Shackelford

[X] **BY U.S. MAIL:** I deposited for mailing in the United States mail, with postage fully prepaid, an envelope containing the above-identified document(s) at Carson City, Nevada, in the ordinary course of business.

[ ] **BY EMAIL ONLY:**

[ ] **BY PERSONAL SERVICE:** I personally delivered the above-identified document(s) by hand delivery to the office(s) of the person(s) named above.

[ ] **BY FACSIMILE:**

[ ] **BY FEDERAL EXPRESS ONE-DAY DELIVERY.**

[ ] **BY MESSENGER SERVICE:** I delivered the above-identified document(s) to Reno-Carson Messenger Service for delivery.

SUZETTE TURLEY

MATUSKA LAW OFFICES, LTD.
2310 South Carson Street, Suite 6
Carson City NV 89701
(775) 350-7220

I:\Client Files\Litigation\Heli Ops\v. Rawson\Pldgs\NOE - Determining Atty's Fees P&S.doc

Exhibit Index

NOTICE OF ENTRY OF ORDER

EXHIBIT	DOCUMENT	NO. OF PAGES
1	Order Determining Amount of Attorney's Fees to be Paid by Plaintiffs and Directing Payment Thereof	3

Exhibit 1

ORDER DETERMINING AMOUNT OF ATTORNEY'S FEES TO BE PAID BY PLAINTIFFS AND DIRECTING PAYMENT THEREOF

(Notice of Entry of Order)

Exhibit 1

ORDER DETERMINING AMOUNT OF ATTORNEY'S FEES TO BE PAID BY PLAINTIFFS AND DIRECTING PAYMENT THEREOF

(Notice of Entry of Order)

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2019 NOV -1 PM 4:44
[illegible] WILLIAMS
CLERK
[illegible] A. NEWTON
DEPUTY

Case No. 11-CV-0296

Dept. No. II

IN THE NINTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF DOUGLAS

PEGGY CAIN, an individual; JEFFREY CAIN, an individual; and HELI OPS INTERNATIONAL, LLC, and Oregon limited liability company,

Plaintiffs,

vs.

D.R. RAWSON, an individual; C4 WORLDWIDE, INC., a Nevada corporation; RICHARD PRICE, an individual; JOE BAKER, an individual; MICKEY SHACKELFORD, an individual; MICHAEL K. KAVANAGH, an individual; JEFFREY EDWARDS, an individual; and DOES 1 through 10, inclusive,

Defendants.

ORDER DETERMINING AMOUNT OF ATTORNEY'S FEES TO BE PAID BY PLAINTIFFS AND DIRECTING PAYMENT THEREOF

On July 17, 2019, the Court entered an *Order Denying Plaintiffs' Motion for Extension of Time*. The Court awarded Defendants Price and Shackelford reasonable attorney's fees, as a sanction, for their efforts in opposition the motion. *Id.* at p. 5. The Courts findings are not repeated herein.

Defendants were ordered to file and serve documentation in support of the amount of fees requested. *Id.* Defendants did so in a brief styled *Motion for Attorney's Fees as a Sanction (NRCP*

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

11). Plaintiffs filed an opposition and Defendants filed a reply.

Defendants support the amount of fees requested by affidavit and billing statements. Plaintiffs submit that some of the billing entries were for efforts unrelated to Defendants' opposition to the motion in question. Defendants reply that to the extent time spent by counsel was tangentially related, the attorney's fees are justified as a fine.

The Court has considered the factors supplied by *Brunzell v. Golden Gate Nat'l Bank*, 85 Nev. 345, 349 (1969) in evaluating the amount of fees requested by Defendants. Counsel for Defendants advocated against the underlying motion by filing a seven-page opposition together with an affidavit of counsel. Counsel's efforts were of sufficient character and quality to successfully defeat the motion. Some of the billed time was, however, only tangentially related to opposing the motion. Defendants did not request a fine and a fine was not assessed by the Court.

The Court finds that billing entries for 6/5/2019, 6/10/2019, 6/11/2019 and 7/18/2019, for both Defendants Price and Shackelford, best exemplify the time directly spent on opposing the motion. The amount of time was reasonable as was the hourly rate given the qualifications and experience of counsel.

Good cause appearing,

IT IS HEREBY ORDERED that the amount of attorney's fees payable by Plaintiffs to Defendants Price and Shackelford is set at $2,100.00. Plaintiffs shall remit said amount to counsel for Defendants Price and Shackelford by November 18, 2019, at 1:30 p.m.

///

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
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IT IS FURTHER ORDERED that Plaintiffs shall appear before the Court for a status hearing on November 18, 2019, at 1:30 p.m. If, prior to the hearing, Plaintiffs comply with this order and file proof of the same with the Court, the hearing will be vacated.

DATED this 1st day of ~~October~~ November, 2019.

THOMAS W. GREGORY
DISTRICT JUDGE

Copies served by mail on ~~October~~ November 1, 2019, addressed to:

Michael Matuska, Esq.
2310 South Carson Street, #6
Carson City, Nevada 89701

Mark Forsberg, Esq.
504 E. Musser Street, Suite 202
Carson City, Nevada 89701

Andrea Domínguez for
Erin C. Plante

THOMAS W. GREGORY
DISTRICT JUDGE
NINTH JUDICIAL
DISTRICT COURT
P.O. BOX 218
MINDEN, NV 89423

CASE NO.	11-CV-0296	
DEPT NO.	II	
PEGGY CAIN, et al,	Plaintiff,	PLAINTIFF'S COUNSEL: Michael Matuska, Esq.
v.		
D.R. RAWSON et al,	Defendant,	DEFENDANT'S COUNSEL: Peter Dubowsky, Esq.
DATE:	10-07-13	
JUDGE:	THOMAS W. GREGORY	
CLERK:	Mary Biaggini	
COURT REPORTER:	Kathy Jackson - JAVS	
LAW CLERK:	Skylar Young	
BAILIFFS:	Bill Addington	

The above-entitled matter was before the Court this being the time set for a HEARING ON MOTION TO TURN OVER FUNDS, MOTION TO COMPEL AND FOR OTHER RELATED RELIEF. The plaintiff was not present in Court but represented by counsel. The defendant was not present in Court but represented by counsel.

The Court stated for the record the purpose of today's hearing and a time line of events.

Mr. Matuska presented opening statements and argument.

Mr. Dubowsky presented opening statements and argument.

Mr. Matuska presented supplemental statements.

The Court recessed.

CASE NO.	11-CV-0296	
DEPT NO.	II	
PEGGY CAIN, et al,	Plaintiff,	PLAINTIFF'S COUNSEL: Michael Matuska
v.		
D.R. RAWSON et al,	Defendant,	DEFENDANT'S COUNSEL: Mr. Thompson
DATE:	10-07-13	
JUDGE:	MICHAEL P. GIBBONS	
CLERK:	Kristin Wilfert	
COURT REPORTER:	Not Reported	
LAW CLERK:	Joan Neuffer	
BAILIFFS:	David Nishikida	

The above-entitled matter was before the Court this being the time set for a HEARING ON CLAIM OF EXEMPTION. The plaintiff was not present in Court but represented by counsel. The defendant was present in Court and represented by counsel.

Mr. Thompson argued that 3 of the funds do not belong in this lawsuit.

The Court took a brief recess so the parties could try to reach a settlement at 3:05 p.m.

The Court reconvened at 3:25 p.m.

Mr. Thompson told the Court that a settlement has not been reached and they are open to a re-hearing.

Ms. Rawson was sworn and testified.

Ms. Rawson told the Court that she had a loan from her parents in the amount of $26,000.00.

The Court DENIED with prejudice the motion for exemption.

Mr. Matuska provided Mr. Thompson a copy of exhibits for a future hearing.

CASE NO.	11-CV-0296	
DEPT NO.	II	
PEGGY CAIN et al,		
	Plaintiff,	PLAINTIFF'S COUNSEL: Michael Matuska
v.		
D.R. RAWSON,		
	Defendant,	DEFENDANT'S COUNSEL: Proper Person
DATE:	10-14-13	
JUDGE:	MICHAEL P. GIBBONS	
CLERK:	Kristin Wilfert	
COURT REPORTER:	Not Reported	
LAW CLERK:	Joan Neuffer	
BAILIFFS:	Eric Lindsay	
OTHERS PRESENT:	Mr. Thompson - via telephone	

The above-entitled matter was before the Court this being the time set for a HEARING ON CLAIMS OF EXEMPTION. The plaintiff was not present in Court but represented by counsel/ Michael Cavanaugh was present in Court and in Proper Person.

Michael Cavanaugh was sworn.

Mr. Cavanaugh said he was homeless with no vehicle. Mr. Cavanaugh requested an exemption.

Defendant marked exhibit A.

Plaintiff marked exhibit 1. The Court admitted exhibit 1.

Mr. Matuska requested that Mr. Cavanaugh appear for a detailed examination, noting that the default judgment was already entered.

Mr. Matuska examined Mr. Cavanaugh in short detail.

Mr. Matuska will represent that there was $2,000,000.00 in account and $1,000,000.00 taken out into Mr. Cavanaugh's joint account.

Plaintiff marked exhibit 2. The Court admitted exhibit 2 for limited purpose.

The Court DENIED with prejudice the request for exemption by Margaret Rawson.

The Court released Mr. Thompson from his duty.

Mr. Cavanaugh's address (UPS Store):
P.O. Box 2401
East Thirty Second Street, Suite 277
Joplin, MO

The Court DENIED Mr. Cavanaugh's request for exemption to claim.

The Court instructed Mr. Matuska to not keep going after Ms. Rawson.

CASE NO. 11-CV-0296

DEPT NO. II

PEGGY AND JEFFREY CAIN, et al,
Plaintiff,

PLAINTIFF'S COUNSEL:
Michael Matuska

v.

DR RAWSON, et al,
Defendant,

DEFENDANT'S COUNSEL:
None Present

DATE: 08-10-15

JUDGE: THOMAS W. GREGORY

CLERK: Kristin Wilfert

COURT REPORTER: Not Reported

LAW CLERK: Skylar Young

BAILIFFS: David Nishikida/William Charles

OTHERS PRESENT: Michael Johnson - Counsel for Joe Baker
Mark Forsberg - Counsel for Richard Price and Mickey Shackelford

The above-entitled matter was before the Court this being the time set for an PRE-TRIAL CONFERENCE. The plaintiff was present in Court and represented by counsel. Defendant Joe Baker was present and represented by counsel. Defendant's Richard Price and Mickey Shackelford were present in Court and represented by counsel.

The Court canvassed the parties as to the Court's procedure for a jury trial.

Mr. Matuska presented statements to the Court.

Mr. Johnson presented statements to the Court.

Mr. Forsberg presented statements to the Court.

Mr. Matuska requested to meet outside of Court with counsel for discussions.

The Court recessed at 3:20 p.m.. The Court reconvened at 4:38 p.m.

The Court stated for the record that it met with counsel in chambers during recess.

The Court stated for the record that there are multiple motions and an agreement with counsel to vacate the trial date.

Mr. Matuska, Mr. Johnson, and Mr. Forsberg all agreed to continue trial to another future date.

A new trial date is now set for April 16, 2016 for 6 days.

A motions hearing is set for December 8, 9, 10, 2015 (3 days) at 9:00 a.m. (All day).

The Court will not renew or extend discovery deadline.

CASE NO. 11-CV-0296

DEPT NO. II

PEGGY CAIN and JEFFREY CAIN,
Plaintiffs,

PLAINTIFF'S COUNSEL:
Michael L. Matuska

v.

MARGARET RAWSON,
Defendant,

DEFENDANT'S COUNSEL:
Peter Dubowsky

DATE: 12-13-17

JUDGE: THOMAS W. GREGORY

CLERK: Autumn Newton

COURT REPORTER: Kathy Jackson

LAW CLERK: Skylar Young

BAILIFFS: Les Vido/Eric Lindsay

The above-entitled matter was before the Court this being the time set for MOTIONS HEARING. The plaintiff was not present in court but was represented by counsel. The defendant was not present in court but was represented by counsel.

DEFENDANT'S EXHIBITS MARKED AND ADMITTED:
A

MARGARET RAWSON'S MOTION TO SET ASIDE VOID JOINT DEBTOR JUDGMENT:

Mr. Dubowsky presented argument.

Mr. Matuska presented argument.

MARGARET RAWSON'S CLAIM OF EXEMPTION FROM EXECUTION:

Mr. Dubowsky presented argument.

Mr. Matuska presented argument.

The Court took both motions under submission and will prepare written orders.

Mr. Matuska requested that a hearing on his Motion for Order to Show Cause Re: Contempt be set.

Mr. Dubowsky opposed Mr. Matuska's request.

The Court will not set a hearing at this time.

Mr. Matuska requested a 30 day extension to file a reply brief.

The Court GRANTED Mr. Matuska's request and ordered that Mr. Matuska shall have until January 12th, 2018 at 5:00 p.m. to file a reply brief or to formally indicate that the motion is being withdrawn or that there is no need for a hearing.

CASE NO. 11-CV-0296

DEPT NO. II

PEGGY CAIN and JEFFREY CAIN,
Plaintiffs,

PLAINTIFF'S COUNSEL:
Michael L. Matuska

v.

MARGARET RAWSON,
Defendant,

DEFENDANT'S COUNSEL:
Mark Forsberg

DATE: 8/19/2019

JUDGE: THOMAS W. GREGORY

CLERK: Delores Goelz

COURT REPORTER: Christy Joyce

LAW CLERK: Andrea Dominguez

BAILIFFS: Les Vido/David Nishikida

The above-entitled matter was before the Court this being the time set for MOTIONS HEARING. The plaintiffs were not present in court but were represented by counsel. The defendants were not present in court but were represented by counsel.

PLAINTIFFS' FIRST MOTION IN LIMINE:

Mr. Matuska presented argument.

Mr. Forsberg presented argument.

MOTION TO STRIKE RICHARD PRICE'S AND MICKEY SHACKELFORD'S AFFIRMATIVE DEFENSES OR, IN THE ALTERNATIVE, FOR PARTIAL SUMMARY JUDMENT:

Mr. Matuska presented argument.

Mr. Forsberg presented argument.

MOTION FOR PARTIAL SUMMARY JUDGMENT ON PERSONAL JURISDICTION:

Mr. Matuska presented argument.

Mr. Forsberg presented argument.

MOTION FOR PARTIAL SUMMARY JUDGMENT AGAINST DEFENDANT RICHARD PRICE:

Mr. Matuska presented argument.

Mr. Forsberg presented argument.

The Court took the motions under submission and will prepare written orders.

Mr. Matuska requested to file a supplemental brief regarding the Nevada Supreme Court decision in Tricarichi v Cooperative Rabobank, U.A.

The Court GRANTED Mr. Matuska's request and ordered that Mr. Matuska shall have until Friday, September 6th, 2019 to file a supplemental brief.

PLAINTIFF'S EXHIBIT LIST

CASE NAME: CAIN RAWSON

CASE NUMBER: 11-CV-0296

DATE OF HEARING: OCTOBER 14, 2013

JUDGE: MICHAEL P. GIBBONS

DEPT NO: II

ATTORNEY: MICHAEL MATUSKA

PURPOSE OF HEARING: **HEARING ON CLAIM OF EXEMPTION**

Exhibit #	Description	Marked for ID	Admitted
1	PLAINTIFF'S INDEX OF EXHIBITS	X	X
2	LETTER FROM MICHAEL MATUSKA DATED OCTOBER 8, 2013	X	X

DEFENDANT'S EXHIBIT LIST

CASE NAME: CAIN V. RAWSON

CASE NUMBER: 11-CV-0296

DATE OF HEARING: OCTOBER 14, 2013

JUDGE: MICHAEL P. GIBBONS

DEPT NO: II

ATTORNEY: THOMPSON

PURPOSE OF HEARING: **HEARING ON CLAIM OF EXEMPTION**

Exhibit #	Description	Marked for ID	Admitted
A	LETTER FROM DR RAWSON DATED JULY 21, 2010	X	

DEFENDANT'S EXHIBIT LIST

CASE NAME: CAIN V. RAWSON

CASE NUMBER: 11-CV-0296

DATE OF HEARING: 12-13-17

JUDGE: THOMAS W. GREGORY

DEPT NO: II

ATTORNEY: PETER DUBOWSKY

PURPOSE OF HEARING: **MOTIONS HEARING**

Exhibit #	Description	Marked for ID	Admitted	Not Admitted
A	COPY OF DEATH CERTIFICATE	X	X	

STATE OF NEVADA)
) ss
COUNTY OF DOUGLAS)

I, BOBBIE WILLIAMS, Clerk of the Ninth Judicial District Court, State of Nevada, in and for the County of Douglas; said Court being a Court of Record, having common law jurisdiction, and a Clerk and a Seal, do hereby certify that the foregoing are true copies of the following originals in Case No. 11-CV-0296 (CAIN V RAWSON ET AL.); Notice of Cross-Appeal; Case Appeal Statement; District Court Docket Entries; Order Determining Amount of Attorney's Fees to be Paid by Plaintiffs and Directing Payment Thereof; Order Denying Plaintiffs' Motion for Extension of Time; Order Denying Motion for Attorney Fees; Notice of Entry of Order; District Court Minutes and Exhibit Lists.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my Official Seal at Minden, in said County and State this 30 day of December, 2019

CLERK OF THE COURT

By: _____
Deputy Court Clerk

Douglas County

BOBBIE R. WILLIAMS
CLERK OF COURT
COURT ADMINISTRATOR
JURY COMMISSIONER

District Court Clerk's Office
(775) 782-9820
Tahoe Justice Court
(775) 586-7200
East Fork Justice Court
(775) 782-9955

Transmittal to the Supreme Court

To: Nevada Supreme Court
210 South Carson Street
Carson City, Nevada 89710

Date: December 20, 2019

Re: District Court Case #: 11-CV-0296

District Court Case Name: **CAIN V RAWSON ET AL.**

The following documents are transmitted to the Supreme Court pursuant to the July 22, 1996 revisions to the Nevada Rules of Appellate Procedure. Checked items are **NOT** included in this appeal:

- ☐ Notice of Appeal
- ☐ Case Appeal Statement
- √ Notice of Posting of Appeal Bond
- ☐ District Court Docket entries
- √ Request for Transcript
- ☐ Judgment(s) or order(s) appealed from
- √ Order (NRAP FORM 4)
- ☐ Notice of entry of the judgment(s) or order(s) appealed from
- √ Certification order directing entry of judgment pursuant to NRCP 54(b)
- ☐ District Court Minutes
- ☐ Exhibit List
- √ Supreme Court filing fee ($250.00), under separate cover.

Respectfully,
BOBBIE WILLIAMS
CLERK OF THE COURT

By: _____
Deputy Court Clerk

P.O. Box 218 • Minden, Nevada 89423