

IN THE SUPREME COURT OF THE STATE OF NEVADA

AIRMOTIVE INVESTMENTS, LLC, A)
NEVADA LIMITED LIABILITY)
COMPANY,)

Appellant,)

vs.)

BANK OF AMERICA, N.A.,)

Respondent.)

Electronically Filed
Dec 21 2020 05:57 p.m.
Elizabeth A. Brown
Clerk of Supreme Court
Supreme Court No. 80373

APPEAL

From the Eighth Judicial District Court,
The Honorable Stefany A. Miley, District Judge
District Court Case No. A-12-654840-C

JOINT APPENDIX - VOLUME 6

Roger P. Croteau, Esq.
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Timothy E. Rhoda, Esq.
Nevada Bar No. 7878
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Airmotive Investments, LLC

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MEMC
DARREN T. BRENNER, ESQ.
Nevada Bar No. 8386
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Attorneys for Bank of America, N.A.

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

AIRMOTIVE INVESTMENTS, LLC, a Nevada
limited liability company,

Plaintiff,

v.

BANK OF AMERICA, N.A.; GENEVIEVE
UNIZA-ENRIQUEZ; DOES 1 through 20, and
ROE CORPORATIONS 1 through 20, inclusive,

Defendants.

Case No.: A-12-654840-C

Dept. No.: XXIII

**BANK OF AMERICA, N.A.'S
MEMORANDUM OF COSTS**

AND ALL RELATED CLAIMS.

JARED M. SECHRIST, counsel for defendant, states as follows:

I am a duly licensed attorney admitted to practice in the State of Nevada. I am an attorney at the law firm of Akerman LLP, counsel for Bank of America, N.A. (**BANA**) in this matter. BANA is the prevailing party in this case. I have personal knowledge of the following costs and disbursements expended, and the items contained below are true and correct to the best of my knowledge and belief.

These costs and disbursements were reasonable and necessarily and actually incurred in this action. Attached as Exhibits A and B are true and correct copies of Invoices and Receipts for the costs listed below.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 DATED on October 21, 2019.

3 /s/ Jared M. Sechrist, Esq.
JARED M. SECHRIST, ESQ.

4 **I. Legal Discussion**

5 NRS 18.020(5) allows for a prevailing party to recover its costs in an action involving the
6 title or boundaries of real estate, stating that costs must be allowed of course to the prevailing party
7 against any adverse party against whom judgment is rendered, including:

- 8 5. In an action which involves the title or boundaries of real estate, or the legality
9 of any tax, impost, assessment, toll or municipal fine, including the costs
accrued in the action if originally commenced in a Justice Court.

10 *Id.* (emphasis added). Additionally, NRS 116.3116(12) allows for costs to the prevailing party for
11 an action brought under NRS 116.3116:

- 12 12. A judgment or decree in any action brought under this section must include
13 costs and reasonable attorney's fees for the prevailing party.

14 *Id.* Thus, since this case involved a dispute as to the fact that Plaintiff Airmotive Investments LLC
15 (**Plaintiff**) held title to property free and clear of BANA's interest under NRS 116.3116, appropriate
16 costs must be allowed.

17 NRS 18.005 outlines the costs that can be recovered by a prevailing party:

- 18 1. Clerks' fees.
- 19 2. Reporters' fees for depositions, including a reporter's fee for one copy of each
20 deposition.
- 21 3. Jurors' fees and expenses, together with reasonable compensation of an officer
appointed to act in accordance with NRS 16.120.
- 22 4. Fees for witnesses at trial, pretrial hearings and deposing witnesses, unless the court
23 finds that the witness was called at the instance of the prevailing party without reason
or necessity.
- 24 5. Reasonable fees of not more than five expert witnesses in an amount of not more than
25 \$1,500 for each witness, unless the court allows a larger fee after determining that the
circumstances surrounding the expert's testimony were of such necessity as to require
26 the larger fee.
- 27 6. Reasonable fees of necessary interpreters.

28 ...

7. The fee of any sheriff or licensed process server for the delivery or service of any summons or subpoena used in the action, unless the court determines that the service was not necessary.
8. Compensation for the official reporter or reporter pro tempore.
9. Reasonable costs for any bond or undertaking required as part of the action.
10. Fees of a court bailiff or deputy marshal who was required to work overtime,
11. Reasonable costs for telecopies.
12. Reasonable costs for photocopies.
13. Reasonable costs for long distance telephone calls.
14. Reasonable costs for postage.
15. Reasonable costs for travel and lodging incurred taking depositions and conducting discovery.
16. Fees charged pursuant to NRS 19.0335.
17. Any other reasonable and necessary expense incurred in connection with the action, including reasonable and necessary expenses for computerized services for legal research.

Below is a list of the costs that are recoverable by BANA for costs that were reasonable, necessary, and actually incurred in BANA's litigation of this matter.

II. Clerk's Filing Fees (pursuant to NRS 18.005(1))

September 8, 2013	BANA's Motion To Dismiss Second Amended Complaint	\$3.50
September 8, 2013	Certificate Of Service	\$3.50
October 8, 2013	BANA's Reply In Support Of Motion To Dismiss Second Amended Complaint	\$3.50
November 8, 2013	BANA's Opposition To Motion For Reconsideration	\$3.50
November 8, 2013	Notice Of Change Of Firm Name	\$3.50
November 8, 2013	Order Granting BANA's Motion To Dismiss Second Amended Complaint	\$3.50
November 8, 2013	Notice Of Entry Of Order Granting BANA's Motion To Dismiss Second Amended Complaint	\$3.50
February 8, 2014	Order Denying Motion For Reconsideration	\$3.50
February 8, 2014	Notice Of Entry Of Order Denying Motion For Reconsideration	\$3.50

1	December 8, 2014	Stipulation Requesting The Court To Reconsideration And Certification	\$3.50
2	April 8, 2015	Answer To Second Amended Complaint	\$3.50
3	April 8, 2015	Initial Appearance Fee Disclosure	\$3.50
4	June 8, 2015	Response In Opposition To Las Vegas Development Group, LLC's Motion To Dismiss Counterclaim	\$3.50
5			
6	September 8, 2015	BANA's Motion For Leave To Amend Its Answer To Add Affirmative Defenses And Counterclaim And To Join Parties To Add Claims	\$3.50
7			
8	March 8, 2016	BANA's Amended Answer, Counterclaims And Crossclaims To Second Amended Complaint	\$3.50
9	June 6, 2016	BANA's Answer To Third Amended Complaint And Counterclaims	\$3.50
10			
11	January 9, 2017	Second Amended Joint Case Conference Report	\$3.50
12	October 8, 2018	Stipulation And Order To Reopen And Extend Discovery Deadlines	\$3.50
13	October 8, 2018	Notice Of Entry Of Stipulation And Order To Reopen And Extend Discovery Deadlines	\$3.50
14			
15	April 8, 2019	BANA's Motion For Summary Judgment	\$209.50
16	May 8, 2019	Stipulation And Order To Substitute Airmotive Investments LLC For Las Vegas Development Group, LLC	\$3.50
17	May 8, 2019	Notice Of Entry Of Stipulation And Order To Substitute Airmotive Investments LLC For Las Vegas Development Group, LLC	\$3.50
18			
19	August 8, 2019	Stipulation And Order Continuing Hearing On BANA's Motion For Summary Judgment	\$3.50
20			
21	August 8, 2019	Notice Of Entry Of Stipulation And Order Continuing Hearing On BANA's Motion For Summary Judgment	\$3.50
22	September 8, 2019	BANA's Reply In Support Of Motion For Summary Judgment	\$3.50
23	SUBTOTAL:		\$293.50
24	<i>See Exhibit A - Invoices & Receipts</i>		
25	<i>See Exhibit B - Akerman Cost Detail</i>		
26	...		
27	...		
28	...		

III. Reporter's Fees (pursuant to NRS 18.005(2))

August 29, 2013	Deposition Of Judith Moore, 30(b)(6) Representative Of BANA (Atkinson Baker, Inc. Court Reporters)	\$196.75
August 3, 2017	Deposition Of Jon Jentz, 30(b)(6) Representative Of Las Vegas Development Group LLC (All American Court Reporters)	\$435.90
March 1, 2019	Deposition Of Yvette Saucedo, 30(b)(6) Representative Of Palo Verde Ranch Homeowners Association (All American Court Reporters)	\$335.00
March 1, 2019	Deposition Of Kelly Mitchell, 30(b)(6) Representative Of Absolute Collection Services LLC (All American Court Reporters)	\$345.00
SUBTOTAL:		\$1,312.65

See Exhibit A – Invoices & Receipts
See Exhibit B – Akerman Cost Detail

IV. Expert Fees (pursuant to NRS 18.005(5))

April 26, 2017	Expert Appraisal (Valbridge Property Advisors)	\$400.00
SUBTOTAL:		\$400.00

See Exhibit A – Invoices & Receipts
See Exhibit B – Akerman Cost Detail

V. Service of Subpoenas/Summons (pursuant to NRS 18.005(7))

June 23, 2017	Delivery Service (Nationwide Legal; Subpoena Duces Tecum To Las Vegas Development Group)	\$55.00
June 23, 2017	Delivery Service (Nationwide Legal; Subpoena Duces Tecum To Palo Verde Ranch Homeowners Association)	\$55.00
February 15, 2019	Delivery Service (Nationwide Legal; Subpoena For Deposition Of Rule 30(b)(6) Witness For Palo Verde Ranch Homeowners Association)	\$95.00
February 15, 2019	Delivery Service (Nationwide Legal; Subpoena For Deposition Of Rule 30(b)(6) Witness For Absolute Collection Services LLC)	\$95.00
SUBTOTAL:		\$300.00

See Exhibit A – Invoices & Receipts
See Exhibit B – Akerman Cost Detail

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VI. Postage (pursuant to NRS 18.005(14))

November 13, 2012	Postage	\$0.45
November 13, 2012	Postage	\$0.90
November 26, 2012	Postage	\$0.45
June 12, 2013	Postage	\$5.05
August 16, 2013	Postage	\$5.32
September 9, 2013	Postage	\$0.86
October 10, 2013	Postage	\$0.66
March 30, 2015	Postage	\$0.48
March 30, 2015	Postage	\$6.70
SUBTOTAL:		\$20.87

See Exhibit A – Invoices & Receipts
See Exhibit B – Akerman Cost Detail

VII. Other Reasonable and Necessary Expenses (pursuant to NRS 18.005(17))

August 8, 2013	Other Charges (Nevada Title Company; Recorded Property Document Retrieval)	\$10.00
August 31, 2013	Delivery Service (Nationwide Legal; Courtesy Copy Of BANA's Motion To Dismiss Second Amended Complaint)	\$10.00
September 15, 2013	Delivery Service (Nationwide Legal; Courtesy Copy Of BANA's Reply In Support Of Motion To Dismiss Second Amended Complaint To Court)	\$10.00
September 3, 2013	Delivery Service (Nationwide Legal; Order Granting BANA's Motion To Meier & Fine)	\$25.00
October 15, 2013	Delivery Service (Nationwide Legal; Order Granting BANA's Motion To Court)	\$10.00
November 15, 2013	Delivery Service (Nationwide Legal; BANA's Opposition To Motion To Court)	\$10.00
January 12, 2014	Delivery Service (Runners On A Dime; Order Denying Motion For Reconsideration To Court)	\$10.00
November 14, 2014	Delivery Service (Runners On A Dime; Stipulation From Croteau & Associates To Akerman LLP)	\$80.00

1	August 14, 2015	Delivery Service (Nationwide Legal; BANA's Motion For Leave To Amend Its Answer To Add Affirmative Defenses And Counterclaim And To Join Parties To Add Claims To Court)	\$39.00
2			
3	February 10, 2017	Delivery Service (Nationwide Legal; Second Amended Joint Case Conference Report To Croteau & Associates)	\$35.00
4	September 8, 2018	Other Charges (DataTree; Recorded Property Document Retrieval)	\$136.25
5			
6	September 23, 2018	Delivery Service (First Legal; Stipulation And Order To Reopen And Extend Discovery Deadlines From Croteau & Associates To Akerman LLP)	\$44.07
7			
8	April 5, 2019	Delivery Service (Nationwide Legal; Stipulation And Order From Croteau & Associates To Akerman LLP)	\$15.00
9	SUBTOTAL:		\$434.32

10 *See Exhibit A – Invoices & Receipts*
11 *See Exhibit B – Akerman Cost Detail*

12 **GRAND TOTAL:** **\$2,761.34**

13 DATED October 21, 2019.

14 **AKERMAN LLP**

15 /s/ Jared M. Sechrist
16 DARREN T. BRENNER, ESQ.
17 Nevada Bar No. 8386
18 JARED M. SECHRIST, ESQ.
19 Nevada Bar No. 10439
20 1635 Village Center Circle, Suite 200
21 Las Vegas, Nevada 89134

22 *Attorneys for Bank of America, N.A.*

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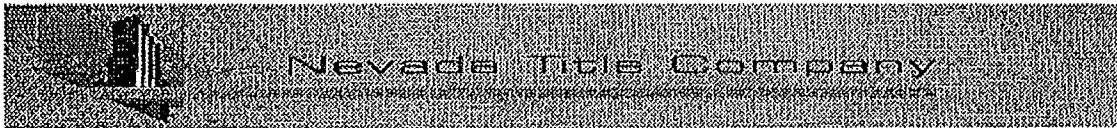
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5

EXHIBIT A

EXHIBIT A

INVOICE



2500 North Buffalo Dr. • Suite 150 • Las Vegas, NV 89128 • 702-251-5240 • Fax: 702-362-3432

INVOICE NO. ACK809

Customer		Invoice Date	
Name	Akerman Senerfitt LLP	Department	CUSTOMER SERVICE
Address	1160 Town Center #330	Order No.	0
City	Las Vegas State NV ZIP 89144	Cust. Contact	
Phone	702-634-5000		

	Description	Unit Price	TOTAL
8/8/2013	Genevlev Uniza-Enriquez APN 140-34-413-075 266731	\$10.00	\$10.00
~ Method of Delivery via (fax, runner, etc.) ~			

Payment Details

☒ DUE UPON RECEIPT

☐ CHECK # _____

SubTotal	
SubTotal	
AMOUNT DUE	\$10.00

Office Use Only

ATKINSON-BAKER, INC.
500 NORTH BRAND BOULEVARD, THIRD FLOOR
GLENDALE, CA 91203-4725
800-288-3376, 800-925-5910 fax
www.depo.com

Akerman Senterfitt
1160 Town Center Drive
Suite 330
Las Vegas, NV 89144-

INVOICE NO. A60A10A AB
FIRM NO. 1239368
INVOICE DATE 08/29/2013
DUE UPON RECEIPT

Please refer to the Invoice No. and your Firm No. in any correspondence.
Contact Kelly Ryan
kryan@depo.com

ABI'S Federal ID No.: 95-4189037

Setting Firm: Nicholas A. Boylan, A.P.C.
Taking Attorney: Nicholas A. Boylan
Case Name: Las Vegas Dvlpmnt Group v Bank of America
Case No.: A-12-654840-C

ITEM	LINE TOTAL
Eletronic transcript of the deposition of Judith Moore, taken 10/15/2012.	\$ 196.75
PAYMENTS	- \$ 0.00
BALANCE DUE	\$ 196.75

A service fee of .75% per month will be added to any invoice over 30 days old.

----- Fold and tear at this perforation, then return stub with payment. -----

BALANCE DUE	\$ 196.75
INVOICE NO.	A60A10A AB
FIRM NO.	1239368

For: Eletronic transcript of the deposition of Judith
Moore, taken 10/15/2012.

From:

Akerman Senterfitt
1160 Town Center Drive
Suite 330
Las Vegas, NV 89144-

Remit To:

Atkinson-Baker, Inc.
500 NORTH BRAND BOULEVARD,
THIRD FLOOR
GLENDALE, CA 91203-4725

If you have already paid for this service by COD, then this invoice is for your records only.

JA 0560



1609 James M Wood Blvd, Los Angeles, CA 90015

INVOICE

Invoice No.	Customer No.
212070	21025
Inv Date	Total Due
8/31/13	

AKERMAN SENTERPITT, LLP
1160 TOWN CENTER DR.
SUITE 330
LAS VEGAS, NV 89144

For any billing questions
Pls call Michael Lazcano
Tel: 702-385-5444
LICENSE # 1656

DATE	OFFICE NO.	FILE NO.	PERIOD ENDING	AMOUNT DUE	PAY TO
8/16/13	21028839	CR	21025	212070	8/31/13
COURT RUN / NEXT DAY			13		
AKERMAN SENTERPITT, LLP 1160 TOWN CENTER DR. LAS VEGAS NV 89144 Caller: Case Number: A-12-654840-C Documents: COURTESY COPY OF MOTION TO DISMISS AND C Client/Matter: ENRIQUEZ - 266731			JUDGE STEPHANIE MILEY 200 LEWIS AVENUE LAS VEGAS NV 89101 Case Title: LVDG V. ENRIQUEZ DISMISS AND C Signed by: DELIVERED CC		
Total Charges for Ref. - ENRIQUEZ - 266731:			10.00		
Base Chg :			10.00		
			10.00		

INVOICE PAYMENT DUE UPON RECEIPT

42

Details of filing: *Bank of America, N.A.'s Motion to Dismiss Second Amended Complaint*
Filed in Case Number: A-12-654840-C

E-File ID: 4661767

Lead File Size: 260225 bytes

Date Filed: 2013-08-15 14:48:32.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Bank of America, N.A.'s Motion to Dismiss Second Amended Complaint

Filing Type: EFO

Filer's Name: Ariel Stern

Filer's Email: bradley.lipman@akerman.com

Account Name: Ariel Stern

Filing Code: MDSM

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 15-AUG-2013 07:02:19 PM: Approved \$3.50 on Visa account "Ariel Stern" [****-0061]

Comments:

Courtesy Copies: debbie.jullen@akerman.com;jacob.bundick@akerman.com;bradley.lipman@akerman.com

Firm Name: Akerman Senterfitt

Your File Number: 266731

Status: Accepted - (A)

Date Accepted: 2013-08-15 16:02:25.0

Review Comments:

Reviewer: Lovle Hawkins

File Stamped Copy: A-12-654840-C-4661767 MDSM Bank of America N A s Motion to Dismiss Second Amended Complaint.pdf

Cover Document:

Lead Document: LVDG - Motion to Dismiss 26916411 v 1.PDF 260225 bytes

Attachment # 1: LVDG - Motion to Dismiss - Exh A 26917607 v 1.PDF 701337 bytes

Attachment # 2: LVDG - Motion to Dismiss - Exh B 26917611 v 1.PDF 37901 bytes

Attachment # 3: LVDG - Motion to Dismiss - Exh C 26917617 v 1.PDF 68616 bytes

Documents: **Attachment # 4:** LVDG - Motion to Dismiss - Exh D 26917625 v 1.PDF 35013 bytes

Attachment # 5: LVDG - Motion to Dismiss - Exh E 26917626 v 1.PDF 38409 bytes

Attachment # 6: LVDG - Motion to Dismiss - Exh F 26917630 v 1.PDF 65752 bytes

Attachment # 7: LVDG - Motion to Dismiss - Exh G 26917635 v 1.PDF 33431 bytes

Attachment # 8: LVDG - Motion to Dismiss - Exh H 26917638 v 1.PDF 143840 bytes

Attachment # 9: LVDG - Motion to Dismiss - Exh I 26917642 v 1.PDF 48012 bytes

Attachment # 10:	<u>LVDG - Motion to Dismiss - Exh J 26917650 v 1.PDF</u>	86091 bytes
Attachment # 11:	<u>LVDG - Motion to Dismiss - Exh K 26917655 v 1.PDF</u>	63339 bytes
Attachment # 12:	<u>LVDG - Motion to Dismiss - Exh L 26917662 v 1.PDF</u>	114289 bytes
Attachment # 13:	<u>LVDG - Motion to Dismiss - Exh M 26917664 v 1.PDF</u>	2118220 bytes
Attachment # 14:	<u>LVDG - Motion to Dismiss - Exh N 26917676 v 1.PDF</u>	35737 bytes
Attachment # 15:	<u>LVDG - Motion to Dismiss - Exh O 26917677 v 1.PDF</u>	136076 bytes
Attachment # 16:	<u>LVDG - Motion to Dismiss - Exh P 26917681 v 1.PDF</u>	71573 bytes
Attachment # 17:	<u>LVDG - Motion to Dismiss - Exh Q 26917684 v 1.PDF</u>	26551 bytes
Attachment # 18:	<u>LVDG - Motion to Dismiss - Exh R 26917690 v 1.PDF</u>	253115 bytes
Attachment # 19:	<u>LVDG - Motion to Dismiss - Exh S 26917691 v 1.PDF</u>	43252 bytes
Attachment # 20:	<u>LVDG - Motion to Dismiss - Exh T 26917696 v 1.PDF</u>	20051 bytes

Data Reference ID:**Credit Card** System Response: VXJCAE4A0334**Response:** Reference:

Details of filing: *Certificate of Service*
Filed in Case Number: A-12-654840-C

E-File ID: 4664642

Lead File Size: 142651 bytes

Date Filed: 2013-08-16 10:21:00.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Certificate of Service

Filing Type: EFO

Filer's Name: Ariel Stern

Filer's Email: bradley.lipman@akerman.com

Account Name: Ariel Stern

Filing Code: CSERV

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 16-AUG-2013 02:03:43 PM: Approved \$3.50 on Visa account "Ariel Stern" [****-0061]

Comments:

Courtesy Copies: debbie.julien@akerman.com;natalie.winslow@akerman.com;bradley.lipman@akerman.com

Firm Name: Akerman Senterfitt

Your File Number: 266731

Status: Accepted - (A)

Date Accepted: 2013-08-16 11:03:44.0

Review Comments:

Reviewer: Chauntel Hahn

File Stamped Copy: A-12-654840-C-4664642 CSERV Certificate of Service.pdf

Cover Document:

Documents:

Lead Document: LVDG - Cert of Service Of Motion to Dismiss 26920274 v 1.PDF 142651 bytes

Data Reference ID:

Credit Card Response: System Response: VLFC9E637923
Reference:



1609 James M Wood Blvd., Los Angeles, CA 90015

INVOICE

Invoice No.	Customer No.
212109	21025
Invoice Date	Invoice Due
9/15/13	
Invoice To	Invoice From

AKERMAN SENTERFITT, LLP
1160 TOWN CENTER DR.
SUITE 330
LAS VEGAS, NV 89144

For any billing questions
Ple call Michael Lazzano
Tel: 702-385-5444
LICENSE # 1656

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg.		
			21025	212109	9/15/13		9		
Date	Order No.	Svc	Service Detail			Charges	Total		
9/09/13	21029820	CR	AKERMAN SENTERFITT, LLP 1160 TOWN CENTER DR. LAS VEGAS NV 89144 Caller: Case Number: A-12-654840-C Documents: BANK OF AMERICA, N.A.'S REPLY IN SUPPORT Client/Matter: ENRIQUEZ - 266731			CLARK COUNTY DISTRICT COURT 200 LEWIS AVENUE LAS VEGAS NV 89101 Case Title: LVDG V. BANK OF AMER Signed by: DELIVERED CC	Base Chg : 10.00	10.00	
COURT RUN / NEXT DAY			Total Charges for Ref. - ENRIQUEZ - 266731:			10.00			

INVOICE PAYMENT DUE UPON RECEIPT

JA 0565



1609 James M Wood Blvd, Los Angeles, CA 90015

INVOICE

Invoice No.	Customer No.
212160	21025
Inv Date	Total Due
9/30/13	

AKERMAN SENTERFITT, LLP
1160 TOWN CENTER DR.
SUITE 330
LAS VEGAS, NV 89144

For any billing questions
Pls call Michael Lazcano
Tel: 702-385-5444
LICENSE # 1656

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg.		
			21025	212160	9/30/13		17		
Date	Ord. No.	Svc	Service Detail				Charges	Total	
9/27/13	21030796	RUD	AKERMAN SENTERFITT, LLP 1160 TOWN CENTER DR. LAS VEGAS NV 89144 Caller: Case Number: A-12-654840-C Documents: ORDER GRANTING BANK OF AMERICA, N.A.'S M Client/Matter: ENRIQUEZ - 266731		MEIER & FINE 2300 W. SAHARA AVE LAS VEGAS NV 89102 Case Title: LVDG V. BANA Signed by: PICKED UP SIGNED ORDER		Base Chg : 25.00	25.00	
RUSH DELIVERY			Total Charges for Ref. - ENRIQUEZ - 266731:		25.00				

----- INVOICE PAYMENT DUE UPON RECEIPT -----

JA 0566



Details of filing: *Bank of America, N.A.'s Reply in Support of Motion to Dismiss Second Amended Complaint*
Filed in Case Number: A-12-654840-C

E-File ID: 4745196

Lead File Size: 56288 bytes

Date Filed: 2013-09-09 11:44:58.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Bank of America, N.A.'s Reply In Support of Motion to Dismiss Second Amended Complaint

Filing Type: EFO

Filer's Name: Ariel Stern

Filer's Email: bradley.lipman@akerman.com

Account Name: Ariel Stern

Filing Code: RIS

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 09-SEP-2013 03:59:33 PM: Approved \$3.50 on Visa account "Ariel Stern" [****-0061]

Comments:

Courtesy Copies: elolsa.nunez@akerman.com;natalie.winslow@akerman.com;adam.crawford@akerman.com;bradley.lipman@akerman.com

Firm Name: Akerman Senterfitt

Your File Number: 266731

Status: Accepted - (A)

Date Accepted: 2013-09-09 12:59:38.0

Review Comments:

Reviewer: Josie San Juan

File Stamped Copy: A-12-654840-C-4745196 RIS Bank of America N A s Reply in Support of Motion to Dismiss Second Amended Complai.pdf

Cover Document:

Documents:

Lead Document: LVDG (Enriquez) - Reply ISO MTD.pdf 56288 bytes

Data Reference ID:

Credit Card Response: System Response: VLCC9F964E9B
Reference:





1609 James M Wood Blvd., Los Angeles, CA 90015

INVOICE

Invoice No.	Customer No.
212199	21025
Inv Date	Total Due
10/15/13	

AKERMAN SENTERFITT, LLP
1160 TOWN CENTER DR.
SUITE 330
LAS VEGAS, NV 89144

For any billing questions
Pls call Michael Lazcano
Tel: 702-385-5444
LICENSE # 1656

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg		
			21025	212199	10/15/13		11		
Date	Ord.No.	Svc	Service Detail				Charges	Total	
10/01/13	21030879	CR	AKERMAN SENTERFITT, LLP 1160 TOWN CENTER DR. LAS VEGAS NV 89144 CLARK COUNTY DISTRICT COURT 200 LEWIS AVENUE LAS VEGAS NV 89101 Caller: Case Number: A-12-654840-C Documents: ORDER GRANTING BANK OF AMERICA, N.A.'S M Client/Matter: ENRIQUEZ - 266731				Base Chg : 10.00	10.00	
COURT RUN	/ NEXT DAY								
			Total Charges for Ref. - ENRIQUEZ - 266731:				10.00		

INVOICE PAYMENT DUE UPON RECEIPT

171

Details of filing: *Bank of America, N.A.'s Opposition to Motion for Reconsideration*
Filed in Case Number: A-12-654840-C

E-File ID: 4960594

Lead File Size: 30591 bytes

Date Filed: 2013-11-04 11:59:22.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Bank of America, N.A.'s Opposition to Motion for Reconsideration

Filing Type: EFO

Filer's Name: Ariel Stern

Filer's Email: bradley.llpman@akerman.com

Account Name: Ariel Stern

Filing Code: OPPM

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 04-NOV-2013 05:35:47 PM: Approved \$3.50 on Visa account "Ariel Stern" [****-0061]

Comments:

Courtesy Copies: eloisa.hunez@akerman.com;natalie.winslow@akerman.com;adam.crawford@akerman.com;bradley.llpman@akerman.com

Firm Name: Akerman L.L.P.

Your File Number: 266731

Status: Accepted - (A)

Date Accepted: 2013-11-04 14:35:53.0

Review Comments:

Reviewer: Allison Behrhorst

File Stamped Copy: A-12-654840-C-4960594 OPPM Bank of America N A s Opposition to Motion for Reconsideration.pdf

Documents: Cover Document:

Lead Document: LVDG (Enriquez) - OPPS to MTN for Reconsideration.pdf 30591 bytes

Data Reference ID:

Credit Card Response: System Response: VUHCB1C15A31
Reference:

170

Details of filing: *Notice of Change of Firm Name*
Filed in Case Number: A-12-654840-C

E-File ID: 4960556

Lead File Size: 13871 bytes

Date Filed: 2013-11-04 11:56:46.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Notice of Change of Firm Name

Filing Type: EFO

Filer's Name: Ariel Stern

Filer's Email: bradley.llpman@akerman.com

Account Name: Ariel Stern

Filing Code: NCFN

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 04-NOV-2013 05:08:44 PM: Approved \$3.50 on Visa account "Ariel Stern" [****-0061]

Comments:

Courtesy Copies: eloisal.nunez@akerman.com;natalie.wlnslow@akerman.com;adam.crawford@akerman.com;bradley.llpman@akerman.com

Firm Name: Akerman L.L.P.

Your File Number: 266731

Status: Accepted - (A)

Date Accepted: 2013-11-04 14:08:55.0

Review Comments:

Reviewer: Kadira Beckom

File Stamped Copy: A-12-654840-C-4960556 NCFN Notice of Change of Firm Name.pdf

Documents: Cover Document:
Lead Document: LVDG (Enriquez) - Notice of Change of Firm Name.pdf 13871 bytes

Data Reference ID:

Credit Card Response: System Response: VPCCA0A4603E
Reference:

Details of filing: *Notice of Entry of Order*
Filed in Case Number: A-12-654840-C

E-File ID: 4876120

Lead File Size: 202467 bytes

Date Filed: 2013-10-10 17:19:41.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Notice of Entry of Order

Filing Type: EFO

Filer's Name: Ariel Stern

Filer's Email: bradley.lipman@akerman.com

Account Name: Ariel Stern

Filing Code: NEOJ

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 11-OCT-2013 11:08:02 AM: Approved \$3.50 on Visa account "Ariel Stern" [****-0061]

Comments:

Courtesy Copies: elolsa.nunez@akerman.com;natalie.winslow@akerman.com;adam.crawford@akerman.com;bradley.lipman@akerman.com

Firm Name: Akerman Senterfitt

Your File Number: 266731

Status: Accepted - (A)

Date Accepted: 2013-10-11 08:08:22.0

Review Comments:

Reviewer: Terri Stringer

File Stamped Copy: A-12-654840-C-4876120 NEOJ Notice of Entry of Order.pdf

Documents: Cover Document:
Lead Document: LVDG (Enriquez) - NEOJ Order Granting MTD.pdf 202467 bytes

Data Reference ID:

Credit Card Response: System Response: VTYCB118DCA8
Reference:

16

Details of filing: *Order Granting Bank of America, N.A.'s Motion to Dismiss Second Amended Complaint*
Filed in Case Number: A-12-654840-C

E-File ID: 4872922

Lead File Size: 190510 bytes

Date Filed: 2013-10-10 11:54:33.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Order Granting Bank of America, N.A.'s Motion to Dismiss Second Amended Complaint

Filing Type: EFO

Filer's Name: Ariel Stern

Filer's Email: bradley.lipman@akerman.com

Account Name: Ariel Stern

Filing Code: OGM

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 10-OCT-2013 05:33:04 PM: Approved \$3.50 on Visa account "Ariel Stern" [****-0061]

Comments:

Courtesy Copies: elolsa.nunez@akerman.com;natalie.winslow@akerman.com;adam.crawford@akerman.com;bradley.lipman@akerman.com

Firm Name: Akerman Senterfitt

Your File Number: 266731

Status: Accepted - (A)

Date Accepted: 2013-10-10 14:33:33.0

Review

Comments:

Reviewer: Katherine Cardenas

File Stamped Copy: A-12-654840-C-4872922 OGM Order Granting Bank of America N A s Motion to Dismiss Second Amended Complaint.pdf

Cover Document:

Documents:

Lead Document: LVDG (Enriquez) - Order Granting MTD (Signed).pdf 190510 bytes

Data Reference ID:

Credit Card Response: System Response: VSYCAF151A22
Response: Reference:

NATIONWIDE LEGAL

NEVADA, LLC

609 James M Wood Blvd, Los Angeles, CA 90015

INVOICE

Invoice No.	Customer No.
212317	21025
Invoice Date	Total Due
11/15/13	

AKERMAN LLP
1160 TOWN CENTER DR.
SUITE 330
LAS VEGAS, NV 89144

For any billing questions
Pls call Michael Lazcano
Tel: 702-385-5444
LICENSE # 1656

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg		
			21025	212317	11/15/13		7		
Date	Order No.	Svc	Service Detail			Charges	Total		
11/05/13	21032546	CRS	AKERMAN SENTERFITT, LLP 1160 TOWN CENTER DR. LAS VEGAS NV 89144 Caller: Case Number: A-12-654840-C Documents: BANK OF AMERICA, N.A.'S OPPOSITION TO MO Client/Matter: ENRIQUEZ - 266731			CLARK COUNTY DISTRICT COURT 200 LEWIS AVENUE LAS VEGAS NV 89101 Case Title: LVDG V. BANA Signed by: DELIVERED CC	Base Chg : 10.00	10.00	✓
COURT RUN	/ SAME DAY		Total Charges for Ref. - ENRIQUEZ - 266731:			10.00			

INVOICE PAYMENT DUE UPON RECEIPT

JA 0573

720 E. Charleston Blvd., Suite 128
Las Vegas, Nevada 89104
Phone # 702-431-5670
billing@runnersonadime.com

Invoice

1/12/2014	916
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Akerman, LLP
Attn: Mardel Deis
1160 Town Center Drive, #330
Las Vegas, NV 89144

Payments/Credits	
Balance Due	
Customer Total Balance	

Net 30

[illegible]

1/3/2014	(1) Scheduled Service		Tracking #: RD-293667 Requested by: Reference Number: Ring - 278987 From: Akerman Senterfitt, LLP, 1160 Town Center Drive, #330, Las Vegas, NV, 89144 To: Clark County District Court (RJC), 200 Lewis Ave., Las Vegas, NV, 89155	10.00 ✓ ✓
			Total	

55

Details of filing: *Order Denying Plaintiff's Motion for Reconsideration*
Filed in Case Number: A-12-654840-C

E-File ID: 5232852

Lead File Size: 101061 bytes

Date Filed: 2014-01-23 14:45:55.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Order Denying Plaintiff's Motion for Reconsideration

Filing Type: EFO

Filer's Name: Ariel Stern

Filer's Email: mardel.dels@akerman.com

Account Name: Ariel Stern

Filing Code: ODM

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 23-JAN-2014 06:24:56 PM: Approved \$3.50 on Visa account "Ariel Stern" [****-0061]

Comments:

Courtesy Copies: debbie.julien@akerman.com;natalie.winslow@akerman.com

Firm Name: Akerman L.L.P.

Your File Number: 266731

Status: Accepted - (A)

Date Accepted: 2014-01-23 15:25:18.0

Review Comments:

Reviewer: Diana Matson

File Stamped Copy: A-12-654840-C-5232852 ODM Order Denying Plaintiff s Motion for Reconsideration.pdf

Cover Document:

Documents:

Lead Document: Enriquez Order 27855587 v 1.PDF 101061 bytes

Data Reference ID:

Credit Card Response: System Response: VLECA6D2AF0F
Reference:

65

Details of filing: *Notice of Entry of Order*
Filed in Case Number: A-12-654840-C

E-File ID: 5240583

Lead File Size: 151364 bytes

Date Filed: 2014-01-27 08:19:27.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Notice of Entry of Order

Filing Type: EFO

Filer's Name: Ariel Stern

Filer's Email: mardel.dels@akerman.com

Account Name: Ariel Stern

Filing Code: NEOJ

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: Processing complete. Payment not yet captured.

Comments:

Courtesy Copies: debbie.jullen@akerman.com;natalie.winslow@akerman.com

Firm Name: Akerman L.L.P.

Your File Number: 266731

Status: Accepted - (A)

Date Accepted: 2014-01-27 08:31:01.0

Review Comments:

Reviewer: Chauntel Hahn

File Stamped Copy: A-12-654840-C-5240583 NEOJ Notice of Entry of Order.pdf

Cover Document:

Documents:

Lead Document: LVDG - Enriquez NOE 27867343 v 1.PDF 151364 bytes

Data Reference ID:

Credit Card Response: System Response: VPFA5294287
Reference:

3/2/2016

E-Filing Details

285

Details of filing: Bank of America, N.A.'s Amended Answer, Counterclaims, and Crossclaims To Second Amended Complaint

Filed in Case Number: A-12-654840-C

E-File ID: 7912505

Lead File Size: 3576283 bytes

Date Filed: 2016-02-29 10:02:52.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Bank of America, N.A.'s Amended Answer, Counterclaims, and Crossclaims To Second Amended Complaint

Filing Type: EFS

Filer's Name: Arlel Stern

Filer's Email: akermanlas@akerman.com

Account Name: Akerman LLP Corporate Card

Filing Code: AANS

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 29-FEB-2016 01:42:11 PM: Approved \$3.50 on MasterCard account "Akerman LLP Corporate Card" [****-2484]

Comments:

**Courtesy
Copies:**

Firm Name: Akerman L.L.P.

**Your File
Number:** 266731 Uniza -Enriquez

Status: Accepted - (A)

Date Accepted: 2016-02-29 10:42:13.0

**Review
Comments:**

Reviewer: Walter Abregow

File Stamped A-12-654840-C-

Copy: 7912505 AANS Bank of America N A s Amended Answer Counterclaims and Crossclaims To Second Am.pdf

Cover Document:

Documents:

Lead Document: Uniza-Rodriquez - Amended Answer.pdf 3576283 bytes

**Data Reference
ID:**

Credit Card System Response: AX1CE2299534

Response: Reference;

204

Details of filing: *Stipulation Requesting the Court for Reconsideration and Certification*
Filed in Case Number: A-12-654840-C

E-File ID: 6416424

Lead File Size: 808429 bytes

Date Filed: 2014-11-26 12:38:23.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Stipulation Requesting the Court for Reconsideration and Certification

Filing Type: EFS

Filer's Name: Ariel Stern

Filer's Email: julle.henning@akerman.com

Account Name: Akerman LLP Corporate Card

Filing Code: STIP

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 27-NOV-2014 12:16:28 AM: Approved \$3.50 on MasterCard account "Akerman LLP Corporate Card" [****-2484]

Comments:

Courtesy Copies:

Firm Name: Akerman L.L.P.

Your File Number: 292911

Status: Accepted - (A)

Date Accepted: 2014-11-26 21:16:30.0

Review Comments:

Reviewer: Ivonne Hernandez

File Stamped Copy: A-12-654840-C-6416424 STIP: Stipulation Requesting the Court for Reconsideration and Certification.pdf

Cover Document:

Documents:

Lead Document: Uniza-Enriquez- Stipulation- 29973731 v 1.PDF 808429 bytes

Data Reference ID:

Credit Card System Response: VPFCB59D03FA

Response: Reference:

Details of filing: *Answer To Second Amended Complaint And Counterclaim*
Filed in Case Number: A-12-654840-C

243

E-File ID: 6800175

Lead File Size: 2962055 bytes

Date Filed: 2015-03-26 17:34:38.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Answer To Second Amended Complaint And Counterclaim

Filing Type: EFS

Filer's Name: Ariel Stern

Filer's Email: julle.henning@akerman.com

Account Name: Akerman LLP Corporate Card

Filing Code: ANAC

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 27-MAR-2015 10:42:50 AM; Approved \$3.50 on MasterCard account "Akerman LLP Corporate Card" [****-2484]

Comments:

Courtesy Copies: michele.pori@akerman.com

Firm Name: Akerman L.L.P.

Your File Number: 0292911 - Enrique, Genevieve

Status: Accepted - (A)

Date Accepted: 2015-03-27 07:42:53.0

**Review
Comments:**

Reviewer: Kadira Beckom

**File Stamped
Copy:** A-12-654840-C-6800175 ANAC Answer To Second Amended Complaint And Counterclaim.pdf

Cover Document:

Documents:
Lead Document: ANS [Enrique, Genevieve] - Answer to Second Amended Complaint and Counterclaim.pdf 2962055 bytes

**Data Reference
ID:**

Credit Card System Response: AQ1CBE4A7D2E

Response: Reference:

Details of filing: *Initial Appearance Fee Disclosure*
Filed in Case Number: A-12-654840-C

E-File ID: 6800194

Lead File Size: 12668 bytes

Date Filed: 2015-03-26 17:47:24.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Initial Appearance Fee Disclosure

Filing Type: EFS

Filer's Name: Ariel Stern

Filer's Email: julle.henning@akerman.com

Account Name: Akerman LLP Corporate Card

Filing Code: IAFD

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 27-MAR-2015 10:44:05 AM: Approved \$3.50 on MasterCard account "Akerman LLP Corporate Card" [****-2484]

Comments:

Courtesy Copies: michele.pori@akerman.com

Firm Name: Akerman L.L.P.

Your File Number: 0292911 - Enrique, Genevieve

Status: Accepted - (A)

Date Accepted: 2015-03-27 07:44:13.0

Review Comments:

Reviewer: Kadir Beckom

File Stamped Copy: A-12-654840-C-6800194 IAFD Initial Appearance Fee Disclosure.pdf

Documents: Cover Document:

Lead Document: PLDG [Enrique, Genevieve] - IAFD 30670682 v 1.PDF 12668 bytes

Data Reference ID:

Credit Card System Response: AS1CCDD87A2B

Response: Reference:

6/18/2015

E-Filing Details

Details of filing: Response in Opposition to Las Vegas Development Group, LLC's Motion to Dismiss Counterclaim
Filed in Case Number: A-12-654840-C

E-File ID: 7030156

Lead File Size: 3283670 bytes

Date Filed: 2015-06-01 22:37:57.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Response in Opposition to Las Vegas Development Group, LLC's Motion to Dismiss Counterclaim

Filing Type: EFO

Filer's Name: Ariel Stern

Filer's Email: julle.hennlng@akerman.com

Account Name: Akerman LLP Corporate Card

Filing Code: OPM

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 02-JUN-2015 12:14:54 PM: Approved \$3.50 on MasterCard account "Akerman LLP Corporate Card" [****-2484]

Comments:

Courtesy Copies:

Firm Name: Akerman L.L.P.

Your File Number:

Status: Accepted - (A)

Date Accepted: 2015-06-02 09:14:54.0

Review Comments:

Reviewer: Terri Stringer

File Stamped Copy: A-12-654840-C-7030156 OPM Response in Opposition to Las Vegas Development Group LLC s Motion to Dismiss Coun.pdf

Cover Document;

Documents:

Lead Document: PLDG [Unlza-Enrique] Opp to MTD.pdf 3283670 bytes

Data Reference ID:

Credit Card System Response: AT1CD391A780

Response: Reference;

308

NATIONWIDE LEGAL

NOVADA, LLC

1609 James M Wood Blvd, Los Angeles, CA 90015

INVOICE

Invoice No.	Customer No.
217232	21025
Invoice Date	Total Due
8/14/15	

AKERMAN LLP
1160 TOWN CENTER DR.
SUITE 350
LAS VEGAS, NV 89144

For any billing questions
Please call Michael Lazzano
Tel: 702-385-5444
LICENSE # 1656

			Customer No.	Invoice No.	Period Ending	Amount Due	Pd		
			21025	217232	8/14/15	\$7			
Date	Order No.	Svc	Service Detail			Charges	Total		
8/14/15	21077103	CRS	AKERMAN LLP 1160 TOWN CENTER DR. LAS VEGAS NV 89144			Base Chg : 15.00 Pw/Pages : 24.00	39.00		
CITRON-SPEEDWAY E-ESAC			Caller: Case Number: A-12-6548046-0 Document: MOTION FOR LEAVE TO AMEND ITS ANSWER TO Client/Matter: UNIZA-ENRIQUEZ - 292911 signed by: DELIVERED DOCS Piece/Pages: 63						
			Total Charges for Ref. - UNIZA-ENRIQUEZ - 292911:			39.00			

INVOICE PAYMENT DUE UPON RECEIPT

JA 0583

9/15/2015

E-Filing Details

24

Details of filing: Bank of America's Motion for Leave to Amend Its Answer to Add an Affirmative Defense and Counterclaim and to Join Parties to Add Claims

Filed in Case Number: A-12-654840-C

E-File ID: 7268435

Lead File Size: 3471370 bytes

Date Filed: 2015-08-07 17:32:47.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Bank of America's Motion for Leave to Amend its Answer to Add an Affirmative Defense and Counterclaim and to Join Parties to Add Claims

Filing Type: EFS

Filer's Name: Ariel Stern

Filer's Email: julie.henning@akerman.com

Account Name: Akerman LLP Corporate Card

Filing Code: MLEV

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 07-AUG-2015 08:51:49 PM: Approved \$3.50 on MasterCard account "Akerman LLP Corporate Card" [****-2484]

Comments:

Courtesy Copies:

Firm Name: Akerman LLP.

Your File Number: Unlza Enriquez - 0292911

Status: Accepted - (A)

Date Accepted: 2015-08-07 17:51:51.0

**Review
Comments:**

Reviewer: Michelle McCarthy

File Stamped: A-12-654840-C-

Copy: 7268435 MLEV Bank of America s Motion for Leave to Amend Its Answer to Add an Affirmative Defens.pdf

Documents: Cover Document:

Lead Document: Unlze Enriquez - BANA's Motion for Leave.pdf 3471370 bytes

**Data Reference
ID:**

**Credit Card
Response:** System Response: AR1CC5CF33C9
Reference:

Details of filing: Bank Of America, N.A.'S Answer To Third Amended Complaint And Counterclaims
Filed in Case Number: A-12-654840-C

E-File ID: 8173648

Lead File Size: 118654 bytes

Date Filed: 2016-05-12 16:43:18.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Bank Of America, N.A.'S Answer To Third Amended Complaint And Counterclaims

Filing Type: EFS

Filer's Name: Ariel Stern

Filer's Email: akermanlas@akerman.com

Account Name: Akerman LLP Corporate Card

Filing Code: ANS

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 13-MAY-2016 12:46:12 PM: Approved \$3.50 on MasterCard account "Akerman LLP Corporate Card" [****-2484]

Comments:

Courtesy Copies:

Firm Name: Akerman L.L.P.

Your File Number: Uniza-Enriquez 292911

Status: Accepted - (A)

Date Accepted: 2016-05-13 09:46:14.0

Review Comments:

Reviewer: Walter Abregow

File Stamped Copy: A-12-654840-C-8173648 ANS Bank Of America N A S Answer To Third Amended Complaint And Counterclaims.pdf

Documents:
Cover Document:

Lead Document: 38255754_1.PDF 118654 bytes

Data Reference ID:

Credit Card System Response: AS1CE421BFF6

Response: Reference:

367

Details of filing: *Second Amended Joint Case Conference Report*
Filed in Case Number: A-12-654840-C

E-File ID: 9054488

Lead File Size: 1126659 bytes

Date Filed: 2017-02-06 16:05:16.0

Case Title: A-12-654840-C

Case Name: Las Vegas Development Group LLC, Plaintiff(s) vs. Bank of America, Defendant(s)

Filing Title: Second Amended Joint Case Conference Report

Filing Type: EFS

Filer's Name: Ariel Stern

Filer's Email: akermanlas@akerman.com

Account Name: Akerman LLP Corporate Card

Filing Code: JCCR

Amount: \$ 3.50

Court Fee: \$ 0.00

Card Fee: \$ 0.00

Payment: 06-FEB-2017 07:51:29 PM: Approved \$3.50 on MasterCard account "Akerman LLP Corporate Card" [****-0458]

Comments:

Courtesy Copies:

Firm Name: Akerman L.L.P.

Your File Number: 292911 - Genevieve Unlza-Enriquez

Status: Accepted - (A)

Date Accepted: 2017-02-06 16:51:31.0

Review Comments:

Reviewer: Roxana Gomez

File Stamped Copy: A-12-654840-C-9054488 JCCR Second Amended Joint Case Conference Report.pdf

Documents: Cover Document:

Lead Document: 40686855_1.PDF 1126659 bytes

Data Reference ID:

Credit Card Response: System Response: AX1CF4272C1D
Reference:



PHONE (213) 249-9999

INVOICE

000141904	210025
2/10/2017	

PLEASE MAKE REMITTANCE TO:

AKERMAN LLP
1160 Town Center Dr, Suite 330
Las Vegas, NV 89144
T (702) 634-5000

Nationwide Legal, LLC
1609 James M Wood Blvd
Los Angeles, CA 90015
TAX ID # 20-8284527

		210025	000141904	2/10/2017	22	
2/6/2017	Delivery Services	AKERMAN LLP			Base Charge : \$ 35.00	35.00
013 - SPECIAL DELIVERY - IMMEDIATELY		1160 Town Center Dr, Suite 330				
NV59836		Las Vegas, NV 89144				
		Case #:				
		Signed by: RENEE				
		Pick up signed Second Amended Joint Case Conference Report and return to me ASAP.				
		Total Charges for reference: 292911 - Genevieve Uniza-Enriquez: \$ 35.00				

INVOICE PAYMENT DUE UPON RECEIPT

JA 0587

GENEVIEVE UNIZA-ENRIQUEZ



Valbridge Property Advisors | Lubawy & Associates, Inc.
3034 S. Durango Dr. #100
Las Vegas, NV 89117
Tel. (702) 242-9369

Invoice

DATE	INVOICE #
4/26/2017	9780

BILL TO

Akerman, LLP
1160 Town Center Dr., Ste. 330
Las Vegas, NV 89144

DUE DATE

4/26/2017

APPRAISER

ML

Prop Address/Location	6279 Downpour Ct		
DESCRIPTION	FILE NUMBER	BORROWER	AMOUNT
An appraisal of the following: 6279 Downpour Court Las Vegas, NV 89110	17-0200-TH	A-12-654840-C	400.00
Please include Inv # when remitting Fed. Tax ID #86-0877370 Late Fee of 1.5% Per Mo. after 30 Days		Total	\$400.00
		Payments/Credits	\$0.00
		Balance Due	\$400.00

JA 0588



PHONE (213) 249-9999

INVOICE

Invoice No.	Customer No.
00000001594	210025
INVOICE DATE:	Total Due
6/23/2017	

PLEASE MAKE REMITTANCE TO:

AKERMAN LLP
1160 Town Center Dr, Suite 330
Las Vegas, NV 89144
T (702) 634-5000

Nationwide Legal, LLC
1609 James M Wood Blvd
Los Angeles, CA 90015
TAX ID # 20-8284527

Customer No.	Invoice No.	Period Ending	Amount Due	Page
210025	00000001594	6/23/2017		6

Date	Type	Service Detail	Charges	Total
6/22/2017	NV82610	AKERMAN LLP 1160 Town Center Dr, Suite 330 Las Vegas, NV 89144 Caller: Carla Llorena Case Title: LAS VEGAS DEVELOPMENT GROUP, L	Custodian of Records Absolute Collection Serv 8440 West Lake Made Boulevard, Suite 210 Las Vegas, NV 89128 Case Number: A-12-654840-C Client/Matter: 292911 - Genevieve Uniza-Enriquez Base Charge : \$ 55.00	\$ 55.00
6/23/2017	NV82609	AKERMAN LLP 1160 Town Center Dr, Suite 330 Las Vegas, NV 89144 Caller: Carla Llorena Case Title: LAS VEGAS DEVELOPMENT GROUP, L	Palo Verde Ranch Homeowners' Association - c 5980 South Durango Drive, Suite 131 Las Vegas, NV 89113 Case Number: A-12-654840-C Client/Matter: 292911 - Genevieve Uniza-Enriquez Base Charge : \$ 55.00	\$ 55.00
292911 - Genevieve Uniza-Enriquez Total:				\$ 110.00

INVOICE PAYMENT DUE UPON RECEIPT

JA 0589

INVOICE

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Suite 300
Las Vegas, NV 89144
Phone: 702.240.4393 Fax: 702.384.5506

Invoice No.	Invoice Date	Job No.
1118922	8/3/2017	1065135
Job Date	Case No.	
7/20/2017	A654840	
Case Name		
Las Vegas Development Group, LLC vs. Bank of America		
Payment Terms		
Net 30		

Akerman, LLP
1160 North Town Center Drive
Suite 330
Las Vegas, NV 89144

ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:

Jon Jentz ~ 30(b)(6) of Las Vegas Development Group, LLC	283.50
Exhibits	2.40
Appearance	150.00
Condensed	0.00
E-Transcript Email	0.00
Courier	0.00
PDF EMAIL (FULL-SIZE TRANSCRIPT)	0.00
PDF EMAIL (EXHIBITS)	0.00
PDF EMAIL (CONDENSED TRANSCRIPT)	0.00

TOTAL DUE >>> \$435.90

Client Matter : 292911 Uniza-Enriquez

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Tax ID: 88-0473546

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Suite 330
Las Vegas, NV 89144

Invoice No. : 1118922
Invoice Date : 8/3/2017
Total Due : \$435.90

Remit To: **All American Court Reporters**
1160 North Town Center Drive
Suite 300
Las Vegas, NV 89144

Job No. : 1065135
BU ID : 3-VEGAS
Case No. : A654840
Case Name : Las Vegas Development Group, LLC vs. Bank of America

JA 0590

283A



Remit Payment To:
 First American Data Tree, LLC
 PO Box 31001-2286
 Pasadena, CA 91110-2286
 Phone: 800-708-8463 Option 2

Account #: 2006067	Invoice #: 20060670818
Julie Henning;Ivy Fasolini	Invoice Date: 8/31/2018
Akerman LLP	Billing Cycle: August 1st - August 31st
1635 Village Center Circle,	
Suite 200	National Package:
Las Vegas, NV 89134	Current Due:
Phone: (702) 634-5000	Grand Total:
Fax:	
	Credit card charge:
	Amount Due: \$0.00

DataTree Classic orders
 New DataTree orders
 Accounting Group: Admin
 Reference #: 2999901

Property:	„NV„Clark APN:
-----------	----------------

Subtotal

Reference #: 2999901
 Reference #: 2999901

Subtotal

Reference #: 300660

Property:	5155 W Tropicana Ave #2021, Las Vegas, NV 89103,LAS VEGAS,NV,89103,CLARK APN: 163-25-510-080
-----------	---

Property:	5155 W Tropicana Ave #B13g3, Las Vegas, NV 89103,LAS VEGAS,NV,89103,CLARK APN: 163-25-510-354
-----------	--

Property:	„NV„Clark APN:
-----------	----------------

JA 0591

Subtotal

C✓

Accounting Group Admin Subtotal

Accounting Group: Miscellaneous

1) Reference #: 288153

Reference #: 288153

Subtotal

D✓

Reference #: 289911

Property: 6279 Downpour Ct, Las Vegas, NV 89110, LAS VEGAS, NV, 89110, CLARK APN: 140-34-413-075			
claire.houck@akerman.com	8/2/2018	Transaction History Full	\$8.00
claire.houck@akerman.com	8/2/2018	Specific Document 2006.714.1826	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2006.726.0278	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2010.625.3864	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2004.820.3880	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2017.307.0183	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2004.820.3879	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2017.105.2749	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2004.820.3882	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2006.630.2110	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2011.405.2463	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2011.1229.0316	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2011.413.0953	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2011.1229.0315	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2011.330.4230	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2011.405.2542	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2011.1222.4870	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2010.630.4065	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2012.412.2494	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2004.820.3881	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2012.725.2736	\$4.75
Property: ,,NV,,Clark APN:			
claire.houck@akerman.com	8/2/2018	Specific Document 2010.0401.001086	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2010.0630.004066	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2010.0714.001222	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2010.1118.001542	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2011.0420.000394	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2012.0120.001280	\$4.75
claire.houck@akerman.com	8/2/2018	Specific Document 2013.1118.000980	\$4.75

Subtotal

\$136.25

E✓

Reference #: 296957

F Reference #: 296957



American Legal Services Nevada
#131432
P.O. Box 59701
Los Angeles CA 90074-9701

TAX ID# 25-1476925

INVOICE

Invoice No.	Customer No.
37017569	37261
Invoice Date	Term
9/23/18	

Akerman LLP
Attn: Julie Henning
1635 Village Ctr Cir, Ste 200
Las Vegas, NV 89134

BILLING/PAYMENT QUESTIONS
CLIENT CARE (877)350-6658

			Customer No.	Invoice No.	Period Ending	Amount Due	Pg		
			37261	37017569	9/23/18		23		
Date	Order No.	Svc	Service Detail					Charges	Total
9/18/18	55091334	REG	Croteau & Associates 9120 West Post Rd. LAS VEGAS NV 89148 Caller: Jill Sallade A-12-654840-C SAO to Reopen Discovery	Akerman LLP 1635 Village Center Circle LAS VEGAS NV 89134			Base Chg : 39.00 Fuel Chg : 5.07		44.07
DELIVERY-REGULAR VEHICLE									
9/20/18	55092405	SPF	Akerman LLP 1635 Village Center Circle LAS VEGAS NV 89134 Caller: Jill Sallade A-12-654840-C LVDG v. BANA SAO to Reopen Discovery	EIGHTH JUDICIAL DISTRICT COURT 200 LEWIS AVENUE LAS VEGAS NV 89105 Comment: NO BASE CHARGE					
FILING SAME DAY-DAILY RUN									
			Please pick up signed SAO and return to this Signed: picked up returned				Ref: 292911/UNI2A		
			Please deliver to the Discovery Commissioner on the Signed: SUBMITTED DISCOVERY				Ref: 292911/UNI2A		
			Total Charges for Ref. - 292911/UNI2A:				44.07		

INVOICE PAYMENT DUE UPON RECEIPT

JA 0593

100

Case # A-12-654840-C - Las Vegas Development Group LL**Envelope Information**

Envelope Id	Submitted Date	Submitted User Name
3191842	9/24/2018 8:47 AM PST	akermanlas@akerman.com

Case Information

Location	Category	Case Type
Department 23	Civil	Title to Property
Case Initiation Date	Case #	
1/17/2012	A-12-654840-C	
Assigned to Judge		
Miley, Stefany		

Filings

Filing Type	Filing Code
EFileAndServe	Stipulation and Order - SAO (CIV)

Filing Description
Stipulation and Order to Reopen
and Extend Discovery Deadlines

Client Reference Number
292911

Filing on Behalf of
Bank of America N A

Filing Status	Accepted Date
Accepted	9/24/2018 10:18 AM PST

Lead Document

File Name	Description	Security	Download
20180921180744911.pdf	Stipulation and Order - SAO (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
--------	------	------	--------	-------------

Parties with No eService

Name	Address
Absolute Collection Services LLC	

Stipulation and Order - SAO (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total:	\$0.00

Total Filing Fee	\$0.00
E-File Fee	\$3.50

Envelope Total: \$3.50

Party Responsible for Fees	Bank of America	Transaction Amount	\$3.50
Payment Account	Akerman LLP	Transaction Id	3969437
Filing Attorney	Natalie Winslow	Order Id	003191842-0
Transaction Response	Payment Complete		

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208

Case # A-12-654840-C - Las Vegas Development Group LL**Envelope Information**

Envelope Id	Submitted Date	Submitted User Name
3204830	9/25/2018 5:00 PM PST	akermanlas@akerman.com

Case Information

Location	Category	Case Type
Department 23	Civil	Title to Property
Case Initiation Date	Case #	
1/17/2012	A-12-654840-C	
Assigned to Judge		
Miley, Stefany		

Filings

Filing Type	Filing Code
EFileAndServe	Notice of Entry of Stipulation and Order - NTSO (CIV)

Filing Description

Notice of Entry of Stipulation and Order to Reopen and Extend Discovery Deadlines

Client Reference Number

292911 - Genevieve Uniza - Enriquez

Filing Status

Accepted

Accepted Date

9/26/2018 6:47 AM PST

Lead Document

File Name	Description	Security	Download
NTC_[Uniza-Enriquez, _Genevieve]_NOE_SAO_to_Reopen_Discovery(Revised)_(served_odyssey).PDF	Notice of Entry of Stipulation and Order - NTSO (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	"Ariel E. Stern, Esq." .		Yes	Not Opened
Sent	"Roger P. Croteau, Esq." .		Yes	9/26/2018 9:21 AM PST
Sent	Akerman Las Vegas Office .		Yes	9/25/2018 5:31 PM PST
Sent	Elizabeth Streible .		Yes	9/26/2018 3:53 PM PST
Sent	Rebekkah Bodoff .		Yes	Not Opened
Sent	Shirin Weisman .		Yes	Not Opened

Parties with No eService

Name	Address
Bank of America	

Name	Address
Las Vegas Development Group LLC	10000 Las Vegas Blvd. S. Suite 1000 Las Vegas, NV 89135

Name	Address
Las Vegas Development Group LLC	

Name	Address
Genevieve Uniza-Enriquez	

Name	Address
Bank of America N A	

Name	Address
Bank of America N A	

Name	Address
Palo Verde Ranch HOA	

Name	Address
Absolute Collection Services LLC	

Fees

Notice of Entry of Stipulation and Order - NTSO (CIV)

Description	Amount
Filing Fee	\$0.00
	Filing Total: \$0.00

Total Filing Fee \$0.00

E-File Fee \$3.50

Envelope Total: \$3.50

Party Responsible Bank of America
for Fees

Transaction Amount \$3.50

Payment Account Akerman LLP

Transaction Id 3983324

Filing Attorney Natalie Winslow

Order Id 003204830-0

Transaction Payment Complete
Response

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INVOICE

Invoice No.	Customer No.
00000008409	210025
INVOICE DATE:	Total Due
2/15/2019	

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Las Vegas, NV 89134
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Nationwide Legal, LLC
1609 James M Wood Blvd
Los Angeles, CA 90015
TAX ID # 20-8284527

Customer No.	Invoice No.	Period Ending	Amount Due	Page
210025	00000008409	2/15/2019		6

Date	Order No	Service Detail	Charges	Total
2/13/2019 030 - STANDARD PROCESS - 48 to 72 HRS	NV 67551	<p>AKERMAN LLP 1635 Village Center Circle Suite 200 Las Vegas, NV 89134 Caller: Patricia Larsen Case Title: LAS VEGAS DEVELOPMENT GROUP, L Docs: Please serve depo subpoena, advance fee and provide AOS. Thank you.</p> <p>Palo Verde Ranch Homeowners' Association - c/ 4775 West Teco Avenue, Suite 140 Las Vegas, NV 89118 Case Number: A-12-654840-C Client/Matter: 292911 - Genevieve Uniza-Enriquez</p>	<p>Base Charge : \$ 55.00 Fees Advanced : \$ 40.00</p>	\$ 95.00
2/15/2019 030 - STANDARD PROCESS - 48 to 72 HRS	NV 67553	<p>AKERMAN LLP 1635 Village Center Circle Suite 200 Las Vegas, NV 89134 Caller: Patricia Larsen Case Title: LAS VEGAS DEVELOPMENT GROUP, L Docs: Please serve depo subpoena, advance fee and provide AOS. Thank you.</p> <p>Absolute Collection Services, LLC - c/o Shane 7485 West Azure Drive, Suite 129 Las Vegas, NV 89130 Case Number: A-12-654840-C Client/Matter: 292911 - Genevieve Uniza-Enriquez</p>	<p>Base Charge : \$ 55.00 Fees Advanced : \$ 40.00</p>	\$ 95.00
292911 - Genevieve Uniza-Enriquez Total:				\$ 190.00

INVOICE PAYMENT DUE UPON RECEIPT

JA 0600

INVOICE

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1160 North Town Center Drive
Suite 300
Las Vegas, NV 89144
Phone: 702.240.4393 Fax: 702.384.5506

Invoice No.	Invoice Date	Job No.
1141009	3/1/2019	1093477
Job Date	Case No.	
2/27/2019	A654840	
Case Name		
Las Vegas Development Group, LLC vs. Bank of America		
Payment Terms		
Net 30		

Jared M. Sechrist
Akerman, LLP
1635 Village Center Circle
Suite 200
Las Vegas, NV 89134

ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:

Yvette Saucedo ~ 30(b)(6) for Palo Verde Ranch Homeowners Association	135.00
Appearance	150.00
E-Transcript Email	0.00
Courier	0.00
PDF EMAIL (EXHIBITS)	50.00

TOTAL DUE >>> \$335.00

Client Matter : 292911/Uniza-Enriquez

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Jared M. Sechrist
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Suite 200
Las Vegas, NV 89134

Invoice No. : 1141009
Invoice Date : 3/1/2019
Total Due : \$335.00

Remit To: **All American Court Reporters**
1160 North Town Center Drive
Suite 300
Las Vegas, NV 89144

Job No. : 1093477
BU ID : 3-VEGAS
Case No. : A654840
Case Name : Las Vegas Development Group, LLC vs. Bank of America

JA 0601

INVOICE

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1160 North Town Center Drive
Suite 300
Las Vegas, NV 89144
Phone: 702.240.4393 Fax: 702.384.5506

Invoice No.	Invoice Date	Job No.
1141010	3/1/2019	1093478
Job Date	Case No.	
2/27/2019	A654840	
Case Name		
Las Vegas Development Group, LLC vs. Bank of America		
Payment Terms		
Net 30		

Jared M. Sechrist
Akerman, LLP
1635 Village Center Circle
Suite 200
Las Vegas, NV 89134

ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:

Kelly Mitchell ~ 30(b)(6) for Absolute Collection Services, LLC	145.00
Appearance	150.00
E-Transcript Email	0.00
Courier	0.00
PDF EMAIL (EXHIBITS)	50.00

TOTAL DUE >>> \$345.00

Client Matter : 292911/Uniza-Enriquez

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Tax ID: 88-0473546

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Jared M. Sechrist
Akerman, LLP
1635 Village Center Circle
Suite 200
Las Vegas, NV 89134

Invoice No. : 1141010
Invoice Date : 3/1/2019
Total Due : \$345.00

Remit To: **All American Court Reporters**
1160 North Town Center Drive
Suite 300
Las Vegas, NV 89144

Job No. : 1093478
BU ID : 3-VEGAS
Case No. : A654840
Case Name : Las Vegas Development Group, LLC vs. Bank of America

JA 0602



PHONE (213) 249-9999

INVOICE

Invoice No.	Customer No.
00000009163	210025
INVOICE DATE:	Total Due
4/5/2019	

PLEASE MAKE REMITTANCE TO:

AKERMAN LLP
1635 Village Center Circle Suite 200
Las Vegas, NV 89134
T (702) 634-5000

Nationwide Legal, LLC
1609 James M Wood Blvd
Los Angeles, CA 90015
TAX ID # 20-8284527

Customer No.	Invoice No.	Period Ending	Amount Due	Page
210025	00000009163	4/5/2019		4

Date	Order No.	Service Detail	Charges	Total
4/4/2019	NV 75813			
010 - STANDARD DELIVERY - HRS		<p>Roger P. Croteau & Associates Ltd 2810 W Charleston Rd. Las Vegas, NV 89102 Culler: Patricia Larsen Case Number: N/A Case Title: LAS VEGAS DEVELOPMENT GROUP, L</p> <p>AKERMAN LLP 1635 Village Center Circle Suite 200 Las Vegas, NV 89134</p> <p>Client/Matter: 292911 - Genevieve Uniza-Enriquez Description: Please pick up signed Stip and Order to Substitute Ainnotive Investments LLC for Las Vegas</p>	<p>Base Charge : \$ 15.00</p> <p>292911 - Genevieve Uniza-Enriquez Total:</p>	<p>\$ 15.00</p> <p>\$ 15.00</p>

INVOICE PAYMENT DUE UPON RECEIPT

JA 0603

272

Case # A-12-654840-C - Las Vegas Development Group LL**Envelope Information**Envelope Id
4105933Submitted Date
4/5/2019 6:24 PM PSTSubmitted User Name
akermanlas@akerman.com**Case Information**Location
Department 23Category
CivlCase Type
Title to PropertyCase Initiation Date
1/17/2012Case #
A-12-654840-CAssigned to Judge
Miley, Stefany**Filings**Filing Type
EFileAndServeFiling Code
Motion for Summary Judgment -
MSJD (CIV)Filing Description
Bank of America, N.A.'s Motion for
Summary JudgmentClient Reference Number
292911 (Uniza-Enriquez)Filing on Behalf of
Bank of America N AFiling Status
AcceptedAccepted Date
4/5/2019 6:27 PM PSTAccept Comments
Auto Review Accepted**Lead Document**

File Name	Description	Security	Download
MOT_[Uniza-Enriquez, _Genevieve]_BANA's_Motion_for_Summary_Judgment_(filed_Odyssey).PDF	Motion for Summary Judgment - MSJD (CIV)		Original File Court Copy

Filing Total: \$200.00

Total Filing Fee	\$200.00
Payment Service Fee	\$6.00
E-File Fee	\$3.50

Envelope Total: \$209.50

Party Responsible for Fees	Bank of America N A	Transaction Amount	\$209.50
Payment Account	Akerman LLP	Transaction Id	5020686
Filing Attorney	Jared Sechrist	Order Id	004105933-0
Transaction Response	Payment Complete		

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273

Case # A-12-654840-C - Las Vegas Development Group LL**Envelope Information**Envelope Id
4105933Submitted Date
4/5/2019 6:24 PM PSTSubmitted User Name
akermanlas@akerman.com**Case Information**Location
Department 23Category
CivilCase Type
Title to PropertyCase Initiation Date
1/17/2012Case #
A-12-654840-CAssigned to Judge
Miley, Stefany**Filings**Filing Type
EFileAndServeFiling Code
Motion for Summary Judgment -
MSJD (CIV)Filing Description
Bank of America, N.A.'s Motion for
Summary JudgmentClient Reference Number
292911 (Uniza-Enriquez)Filing on Behalf of
Bank of America N AFiling Status
AcceptedAccepted Date
4/5/2019 6:27 PM PSTAccept Comments
Auto Review Accepted**Lead Document**

File Name	Description	Security	Download
MOT_[Uniza-Enriquez, _Genevieve]	Motion for Summary Judgment - MSJD (CIV)		Original File
_BANA's_Motion_for_Summary_ (filed_Odyssey).PDF			Court Copy

Filing Total: \$200.00

Total Filing Fee	\$200.00
Payment Service Fee	\$6.00
E-File Fee	\$3.50

Envelope Total: \$209.50

Party Responsible for Fees	Bank of America N A	Transaction Amount	\$209.50
Payment Account	Akerman LLP	Transaction Id	5020686
Filing Attorney	Jared Sechrist	Order Id	004105933-0
Transaction Response	Payment Complete		

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12

Case # A-12-654840-C - Airmotive Investments LLC, Plaintiff**Envelope Information****Envelope Id**
4116288**Submitted Date**
4/9/2019 11:48 AM PST**Submitted User Name**
akermanlas@akerman.com**Case Information****Location**
Department 23**Category**
Civil**Case Type**
Title to Property**Case Initiation Date**
1/17/2012**Case #**
A-12-654840-C**Assigned to Judge**
Miley, Stefany**Filings****Filing Type**
EFileAndServe**Filing Code**
Stipulation and Order - SAO (CIV)**Filing Description**
Stipulation and Order to Substitute
Airmotive Investments LLC for Las
Vegas Development Group, LLC**Client Reference Number**
292911 (Uniza-Enriquez)**Filing on Behalf of**
Bank of America**Filing Status**
Accepted**Accepted Date**
4/9/2019 11:50 AM PST**Accept Comments**
Auto Review Accepted**Lead Document**

File Name	Description	Security	Download
PLDG_[Uniza-Enriquez]	Stipulation and Order -		Original File
_SAO_to_Substitute_Airmotive_lr	SAO (CIV)		Court Copy
(filed_Odyssey).PDF			

Exercise Estimation

Status	Name	Firm	Served	Date Opened
Sent	"Ariel E. Stern, Esq." .		Yes	Not Opened
Sent	"Roger P. Croteau, Esq." .		Yes	4/9/2019 3:31 PM PST
Sent	Akerman Las Vegas Office .		Yes	4/9/2019 12:24 PM PST
Sent	Elizabeth Streible .		Yes	4/9/2019 2:48 PM PST
Sent	Rebekkah Bodoff .		Yes	Not Opened
Sent	Shirin Weisman .		Yes	Not Opened
Sent	Jared Sechrist	Akerman LLP	Yes	Not Opened

Articles with No Cover Charge

Name	Address
Bank of America	

Name	Address
Genevieve Uniza-Enríquez	

Name	Address
Bank of America N A	

Name	Address
Palo Verde Ranch HOA	

Name	Address
Absolute Collection Services LLC	

Name	Address
Airmotive Investments LLC	

[illegible]

Description	Amount
Filing Fee	\$0.00
Filing Total:	\$0.00

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total:	\$3.50

Party Responsible for Fees	Bank of America	Transaction Amount	\$3.50
Payment Account	Akerman LLP	Transaction Id	5032339
Filing Attorney	Jared Sechrist	Order Id	004116288-0
Transaction Response	Payment Complete		

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14

Case # A-12-654840-C - Airmotive Investments LLC, Plaint**Envelope Information**

Envelope Id
4119953

Submitted Date
4/9/2019 4:51 PM PST

Submitted User Name
akermanlas@akerman.com

Case Information

Location
Department 23

Category
Civil

Case Type
Title to Property

Case Initiation Date
1/17/2012

Case #
A-12-654840-C

Assigned to Judge
Miley, Stefany

Filings

Filing Type
EFileAndServe

Filing Code
Notice of Entry - NEO (CIV)

Filing Description

Notice of entry of Stipulation and
Order to Substitute Airmotive
Investments, LLC for Las Vegas
Development Group

Client Reference Number
292911 - Uniza-Enriquez, Genvieve

Filing Status
Accepted

Accepted Date
4/9/2019 4:53 PM PST

Accept Comments
Auto Review Accepted

Lead Document

File Name	Description	Security	Download
NTC_[Uniza- Enriquez,_Geneieve] _NOE_SAO_of_Substitution_of_f (served_odyssey).PDF	Notice of Entry - NEO (CIV)		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	"Ariel E. Stern, Esq." .		Yes	Not Opened
Sent	"Roger P. Croteau, Esq." .		Yes	4/10/2019 8:48 AM PST
Sent	Akerman Las Vegas Office .		Yes	4/9/2019 4:56 PM PST
Sent	Elizabeth Streible .		Yes	4/10/2019 2:28 PM PST
Sent	Rebekkah Bodoff .		Yes	Not Opened
Sent	Shirin Weisman .		Yes	Not Opened
Sent	Jared Sechrist	Akerman LLP	Yes	Not Opened

Parties with No eService

Name	Address
Bank of America	

Name	Address
Genevieve Uniza-Enriquez	

Name	Address
Bank of America N A	

Name	Address
Palo Verde Ranch HOA	

Name	Address
Absolute Collection Services LLC	

Name	Address
Alrmotive Investments LLC	

Fees

Notice of Entry - NEO (CIV)

Description	Amount
Filing Fee	\$0.00
Filing Total:	\$0.00

Total Filing Fee	\$0.00
E-File Fee	\$3.50
Envelope Total:	\$3.50

Bank of America N A	\$3.50
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**Party Responsible
for Fees**

Payment Account Akerman LLP
Filing Attorney Jared Sechrist
Transaction Response Payment Complete

**Transaction
Amount**

Transaction Id 5036499
Order Id 004119953-0

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168

Case # A-12-654840-C - Airmotive Investments LLC, Plaintiff**Envelope Information****Envelope Id**
4669825**Submitted Date**
7/30/2019 9:42 AM PST**Submitted User Name**
akermanlas@akerman.com**Case Information****Location**
Department 23**Category**
Civil**Case Type**
Title to Property**Case Initiation Date**
1/17/2012**Case #**
A-12-654840-C**Assigned to Judge**
Miley, Stefany**Filings****Filing Type**
EFileAndServe**Filing Code**
Notice of Entry - NEO (CIV)**Filing Description**Notice of Entry of Stipulation and
Order Continuing Hearing on Bank
of America's Motion for Summary
Judgment**Client Reference Number**292911 - Uniza-Enriquez,
Genevieve**Filing Status**

Accepted

Accepted Date

7/30/2019 9:44 AM PST

Accept Comments

Auto Review Accepted

Lead Document

File Name	Description	Security	Download
NTC_[Uniza- Enriquez,_Genevieve] _Notice_of_Entry_of_SAO_Contir (served_odyssey).PDF	Notice of Entry - NEO (CIV)		Original File Court Copy

1. 本報告係根據「證券管理委員會」及「證券交易所」之規定，由本公司董事會編製，並經會計師查核簽證，其內容如有虛偽、不實或隱匿重要事實，致影響投資者之投資判斷，本公司董事會將依法負法律上之責任。

Parties with No eService

Name	Address
Airmotive Investments LLC	

Fees

Description	Amount
Filing Fee	\$0.00
	Filing Total: \$0.00

Bank of America	\$3.50
-----------------	--------

**Party Responsible
for Fees**

**Transaction
Amount**

Payment Account

Akerman LLP

Transaction Id

5662772

Filing Attorney

Jared Sechrist

Order Id

004669825-0

**Transaction
Response**

Payment Complete

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1166

Case # A-12-654840-C - Airmotive Investments LLC, Plaintiff**Envelope Information****Envelope Id**
4668393**Submitted Date**
7/29/2019 5:14 PM PST**Submitted User Name**
akermanlas@akerman.com**Case Information****Location**
Department 23**Category**
Civil**Case Type**
Title to Property**Case Initiation Date**
1/17/2012**Case #**
A-12-654840-C**Assigned to Judge**
Miley, Stefany**Filings****Filing Type**
EFileAndServe**Filing Code**
Stipulation and Order - SAO (CIV)**Filing Description**Stipulation and Order Continuing
Hearing on Bank of America's
Motion for Summary Judgment**Client Reference Number**
292911 (Uniza-Enriquez)**Filing on Behalf of**
Bank of America**Filing Status**
Accepted**Accepted Date**
7/29/2019 5:15 PM PST**Accept Comments**
Auto Review Accepted**Lead Document**

File Name	Description	Security	Download
PLDG_[Genevieve_Uniza-Enriquez]	Stipulation and Order - SAO (CIV)		Original File
_SAO_to_Continue_Hearing_(filed_Odyssey).PDF			Court Copy

[illegible][illegible][illegible]

**Party Responsible
for Fees**

Payment Account Akerman LLP
Filing Attorney Jared Sechrist
Transaction Response Payment Complete

**Transaction
Amount**

Transaction Id 5660962
Order Id 004668393-0

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227

Case # A-12-654840-C - Airmotive Investments LLC, Plaint**Envelope Information****Envelope Id**
4861546**Submitted Date**
9/5/2019 3:37 PM PST**Submitted User Name**
akermanlas@akerman.com**Case Information****Location**
Department 23**Category**
Civil**Case Type**
Title to Property**Case Initiation Date**
1/17/2012**Case #**
A-12-654840-C**Assigned to Judge**
Miley, Stefany**Filings****Filing Type**
EFileAndServe**Filing Code**
Reply in Support - RIS (CIV)**Filing Description**Bank of America, N.A.'s Reply in
Support of Motion for Summary
Judgment**Client Reference Number**
292911 (Uniza-Enriquez)**Filing on Behalf of**
Bank of America N A**Filing Status**
Accepted**Accepted Date**
9/5/2019 3:38 PM PST**Accept Comments**
Auto Review Accepted**Lead Document**

File Name	Description	Security	Download
PLDG_[Uniza-Enriquez] _BANA's_Reply_iso_Motion_for_{' (filed_Odyssey).PDF	Reply in Support - RIS (CIV)		Original File Court Copy

[illegible]

Name	Address
Airmotive Investments LLC	

[illegible]

**Party Responsible
for Fees****Payment Account**

Akerman LLP

Filing Attorney

Jared Sechrist

**Transaction
Response**

Payment Complete

**Transaction
Amount****Transaction Id**

5877773

Order Id

004861546-0

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Version: 2017.2.5.7059

EXHIBIT B

EXHIBIT B

Date	Initials	Name / Invoice Number	Code	Quantity	Rate	Amount	Description	Cost Index	Image
11/13/2012	1709	WILLIAM P. HELLER	100	1.00	0.45	0.45	POSTAGE-Vegas	11214677	
09/18/2013		Invoice=8843319		0.00	0.00	0.00			
11/13/2012	1709	WILLIAM P. HELLER	100	1.00	0.90	0.90	POSTAGE-Vegas	11214685	
09/18/2013		Invoice=8843319		0.00	0.00	0.00			
11/26/2012	1709	WILLIAM P. HELLER	100	1.00	0.45	0.45	POSTAGE-Vegas	11214731	
09/18/2013		Invoice=8843319		0.00	0.00	0.00			
06/12/2013	1709	WILLIAM P. HELLER	100	1.00	5.05	5.05	POSTAGE-Vegas	11411236	
09/18/2013		Invoice=8843319		0.00	0.00	0.00			
08/08/2013	1709	WILLIAM P. HELLER	274	1.00	10.00	10.00	TITLE SEARCHES	11464242	Y ✓
09/18/2013		Invoice=8843319		1.00	10.00	10.00	- NEVADA TITLE COMPANY: Title Search - 8/8/2013		
							- Uniza-Enriquez, Geneviev, Inv. #ACK809.		
							MD/5035		
		Voucher=1235751 Paid					Vendor=NEVADA TITLE COMPANY Balance= .00 Amount= 10.00		
							Check #11305627 09/12/2013		
08/16/2013	1709	WILLIAM P. HELLER	100	1.00	5.32	5.32	POSTAGE-Las Vegas	11455777	
09/18/2013		Invoice=8843319		0.00	0.00	0.00			
08/29/2013	1709	WILLIAM P. HELLER	275	1.00	196.75	196.75	COURT REPORTER	11481363	Y ✓
10/15/2013		Invoice=8852364		1.00	196.75	196.75	- ATKINSON BAKER INC: Court Reporter -		
							Electronic Transcript of the Deposition of		
							Judith Moore, 10/15/12 - Inv#A60A10AAB, DJ/4528		
		Voucher=1238894 Paid					Vendor=ATKINSON BAKER INC Balance= .00 Amount= 196.75		
							Check #11306592 09/30/2013		
08/31/2013	1709	WILLIAM P. HELLER	235	1.00	10.00	10.00	DELIVERY SERVICE	11482488	Y ✓
10/15/2013		Invoice=8852364		1.00	10.00	10.00	- NATIONWIDE LEGAL LLC: Delivery Services -		
							8/16/13 - Deliver Courtsey copy of Motion to		
							Dismiss and - to Judge Stephanie Miley - Order		
							#21028839, MD/5035		
		Voucher=1239179 Paid					Vendor=NATIONWIDE LEGAL LLC Balance= .00 Amount= 1109.00		
							Check #11306724 09/30/2013		
09/08/2013	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES	11477258	Y ✓
10/15/2013		Invoice=8852364		1.00	3.50	3.50	- SUNTRUST BANKCARD, N.A.: Filing Fee -		
							8/15/2013 - w/NV Court - BOA, N.A.'s Motion to		
							Dismiss Second Amended Complaint - E File		
							#4661767, MD/5035		
		Voucher=1238260 Paid					Vendor=SUNTRUST BANKCARD NA Balance= .00 Amount= 13158.18		
							Check #11306158 09/24/2013		
09/08/2013	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES	11477259	Y ✓
10/15/2013		Invoice=8852364		1.00	3.50	3.50	- SUNTRUST BANKCARD, N.A.: Filing Fee -		
							8/16/2013 - w/NV Court - Certificate of Service		
							- E File #466462, MD/5035		
		Voucher=1238260 Paid					Vendor=SUNTRUST BANKCARD NA Balance= .00 Amount= 13158.18		
							Check #11306158 09/24/2013		
09/09/2013	1709	WILLIAM P. HELLER	100	1.00	0.86	0.86	POSTAGE-Las Vegas	11480489	
10/15/2013		Invoice=8852364		0.00	0.00	0.00			
09/15/2013	1709	WILLIAM P. HELLER	235	1.00	10.00	10.00	DELIVERY SERVICE	11482530	Y ✓
10/15/2013		Invoice=8852364		1.00	10.00	10.00	- NATIONWIDE LEGAL LLC: Delivery Services -		
							9/9/13 - Deliver BOA N.A.'s Reply in Support -		
							to CC District Court - Order #21029820, MD/5035		
		Voucher=1239180 Paid					Vendor=NATIONWIDE LEGAL LLC Balance= .00 Amount= 750.00		
							Check #11306724 09/30/2013		

Date	Initials	Name / Invoice Number	Code	Quantity	Rate	Amount	Description	Cost Index	Image
09/30/2013	1709	WILLIAM P. HELLER	235	1.00	25.00	25.00	DELIVERY SERVICE	11498320	Y ✓
11/30/2013		Invoice=8865282		1.00	25.00	25.00	- NATIONWIDE LEGAL LLC - 9/27/2013 - Deliver		
							Order Granting BOA N.A.'s Motion to Meier & Fine		
							- Order #21030796, MD/5035		
		Voucher=1242703 Paid					Vendor=NATIONWIDE LEGAL LLC Balance= .00 Amount= 2105.50		
							Check #11307776 10/17/2013		
10/08/2013	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES	11495764	Y ✓
11/30/2013		Invoice=8865282		1.00	3.50	3.50	- SUNTRUST BANKCARD, N.A. - 9/9/2013 - E file		
							Bank of America, N.A.'s Reply in Support of		
							Motion to Dismiss Second Amended Complaint -		
							w/NV Court - E File #, MD/5035		
		Voucher=1242268 Paid					Vendor=SUNTRUST BANKCARD NA Balance= .00 Amount= 6955.82		
							Check #11307543 10/14/2013		
10/10/2013	1709	WILLIAM P. HELLER	100	1.00	0.66	0.66	POSTAGE-Vegas	11502289	
11/30/2013		Invoice=8865282		0.00	0.00	0.00			
10/15/2013	1709	WILLIAM P. HELLER	235	1.00	10.00	10.00	DELIVERY SERVICE	11504564	Y ✓
11/30/2013		Invoice=8865282		1.00	10.00	10.00	- NATIONWIDE LEGAL LLC - 10/1/2013 - Pick up		
							form Akerman Order Granting Bank of America,		
							N.A.'s Motion & Deliver to Clark County		
							District Court - Order #21030879 - Inv#212199,		
							MD/5035		
		Voucher=1244125 Paid					Vendor=NATIONWIDE LEGAL LLC Balance= .00 Amount= 1032.00		
							Check #11308357 10/24/2013		
11/06/2013	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES	11524152	Y ✓
01/15/2014		Invoice=8878270		1.00	3.50	3.50	- SUNTRUST BANKCARD, N.A. - 11/4/2013 - E File		
							w/ NV Court - Bank of America N.A.'s Opposition		
							to Motion for Reconsideration - E File#4960594,		
							MD/5035		
		Voucher=1248611 Paid					Vendor=SUNTRUST BANKCARD NA Balance= .00 Amount= 6751.70		
							Check #11309834 11/15/2013		
11/08/2013	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES	11524153	Y ✓
01/15/2014		Invoice=8878270		1.00	3.50	3.50	- SUNTRUST BANKCARD, N.A. - 11/4/2013 - E File		
							w/ NV Court - Notice of Change of Firm Name - E		
							File#4960556, MD/5035		
		Voucher=1248611 Paid					Vendor=SUNTRUST BANKCARD NA Balance= .00 Amount= 6751.70		
							Check #11309834 11/15/2013		
11/08/2013	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES	11524154	Y ✓
01/15/2014		Invoice=8878270		1.00	3.50	3.50	- SUNTRUST BANKCARD, N.A. - 10/10/2013 - E File		
							w/ NV Court - Notice of Entry of order - E		
							File#4876120, MD/5035		
		Voucher=1248611 Paid					Vendor=SUNTRUST BANKCARD NA Balance= .00 Amount= 6751.70		
							Check #11309834 11/15/2013		
11/08/2013	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES	11524155	Y ✓
01/15/2014		Invoice=8878270		1.00	3.50	3.50	- SUNTRUST BANKCARD, N.A. - 10/10/2013 - E File		
							w/ NV Court - Order granting BOA, N.A.'s Motion		
							to Dismiss Second Amended Complaint - E File#,		
							MD/5035		
		Voucher=1248611 Paid					Vendor=SUNTRUST BANKCARD NA Balance= .00 Amount= 6751.70		
							Check #11309834 11/15/2013		
11/15/2013	1709	WILLIAM P. HELLER	235	1.00	10.00	10.00	DELIVERY SERVICE	11540685	Y ✓
01/15/2014		Invoice=8878270		1.00	10.00	10.00	- NATIONWIDE LEGAL LLC - 11/5/2013 - Pick up		
							BOA N.A.'s Opposition to Motion - from Akerman &		
							Deliver to Clark County District Court - Order		
							#21032546, MD/5035		
		Voucher=1252509 Paid					Vendor=NATIONWIDE LEGAL LLC Balance= .00 Amount= 1065.00		
							Check #11311333 12/12/2013		

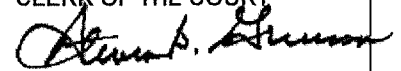
Date	Initials	Name / Invoice Number	Code	Quantity	Rate	Amount	Description	Cost Index	Image
01/12/2014	1709	WILLIAM P. HELLER	235	1.00	10.00	10.00	DELIVERY SERVICE	11568529	Y ✓
02/11/2014		Invoice=8886199		1.00	10.00	10.00	- RUNNERS ON A DIME - Inv#916 -1/8/2014 - Pick up from Akerman - Deliver to Clark County District Court - Ref # 266731 - Tracking # RD 293667, MD/5035		
		Voucher=1258650 Paid					Vendor=RUNNERS ON A DIME Balance= .00 Amount= 295.00 Check #11313140 01/16/2014		
02/08/2014	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES	11592806	Y ✓
03/11/2014		Invoice=8895420		1.00	3.50	3.50	- SUNTRUST BANKCARD NA - 1/23/2014 - E File - Order Denying Motion for Reconsideration - with Clark County District Court - E File Id 5232852, MD/5035		
		Voucher=1265134 Paid					Vendor=SUNTRUST BANKCARD NA Balance= .00 Amount= 5305.27 Check #11315136 02/20/2014		
02/08/2014	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES	11592807	Y ✓
03/11/2014		Invoice=8895420		1.00	3.50	3.50	- SUNTRUST BANKCARD NA - 1/27/2014 - E File - Notice of Entry of Order - with Clark County District Court - E File Id 5240583, MD/5035		
		Voucher=1265134 Paid					Vendor=SUNTRUST BANKCARD NA Balance= .00 Amount= 5305.27 Check #11315136 02/20/2014		
11/14/2014	1709	WILLIAM P. HELLER	235	1.00	80.00	80.00	DELIVERY SERVICE	11808044	Y ✓
12/09/2014		Invoice=8976414		1.00	80.00	80.00	- RUNNERS ON A DIME - RUSH - 11/5/2014 - Pick up from Tim Rhoda Esq - Stipulation - Deliver to Akerman - Tracking # RD-816386, JH/5356		
		Voucher=1314553 Paid					Vendor=RUNNERS ON A DIME Balance= .00 Amount= 1275.00 Check #11329981 11/26/2014		
03/08/2016	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES	12144061	Y ✓
04/06/2016		Invoice=9115901		1.00	0.00	0.00	- BANK OF AMERICA - 285; E-File 7912505; 2/29/16; Clark County District Court; Bank of America, N.A.'s Amended Answer, Counterclaims, and Cross Claims to Second Amended Complaint. JH/5356		
		Voucher=1393246 Paid					Vendor=BANK OF AMERICA Balance= .00 Amount= 21035.72 Check #40474 03/25/2016		
		BILLED TOTALS: WORK:				435.44	31 records		
		BILLED TOTALS: BILL:				412.25			
		GRAND TOTAL: WORK:				435.44	31 records		
		GRAND TOTAL: BILL:				412.25			

Date	Initials	Name / Invoice Number	Code	Quantity	Rate	Amount	Description	Cost Index	Image
12/08/2014	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES	11830670	Y
01/31/2015		Invoice=8991345		1.00	3.50	3.50	- BANK OF AMERICA - 11/26/2014 - E File w/CC Court - Stipulation requesting the court to reconsideration and certification - E File ID #6416424 - Entry #204, JH/5356 Vendor=BANK OF AMERICA Balance= .00 Amount= 11278.44 Check #11331429 12/23/2014		
		Voucher=1319250 Paid							
03/30/2015	1709	WILLIAM P. HELLER	100	1.00	0.48	0.48	POSTAGE	11698609	
04/28/2015		Invoice=9017525		1.00	0.00	0.00			
03/30/2015	1709	WILLIAM P. HELLER	100	1.00	6.70	6.70	POSTAGE	11898610	
04/28/2015		Invoice=9017525		1.00	0.00	0.00			
04/08/2015	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES	11919645	Y
07/24/2015		Invoice=9043058		1.00	3.50	3.50	- BANK OF AMERICA - Entry #243 - 3/26/2015 - E Filed w/CC District Court - Answer to second Amended complaint and Counterclaim - E File ID #6800175, JH/5356 Vendor=BANK OF AMERICA Balance= .00 Amount= 16271.72 Check #W0137099 04/30/2015		
		Voucher=1340489 Paid							
04/08/2015	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES	11919646	Y
07/24/2015		Invoice=9043058		1.00	3.50	3.50	- BANK OF AMERICA - Entry #244 - 3/26/2015 - E Filed w/CC District Court - Initial appearance fee disclosure - E File ID #6800194, JH/5356 Vendor=BANK OF AMERICA Balance= .00 Amount= 16271.72 Check #W0137099 04/30/2015		
		Voucher=1340489 Paid							
06/08/2015	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES	11964617	Y
07/24/2015		Invoice=9043058		1.00	3.50	3.50	- BANK OF AMERICA - 308: District Court Nevada; Response in Opposition to Las Vegas Development Group, LLC's Motion to Dismiss Counterclaim; Uniza, Enrique; 6/1/15; 7030156, JH/5356 Vendor=BANK OF AMERICA Balance= .00 Amount= 20680.62 Check #34126 06/29/2015		
		Voucher=1350368 Paid							
08/14/2015	1709	WILLIAM P. HELLER	235	1.00	39.00	39.00	DELIVERY SERVICE - NATIONWIDE LEGAL NEVADA LLC	12006939	Y
09/01/2015		Invoice=9056954		1.00	39.00	39.00	- 8/14/15, Order#21077183, Judge Miley- Depl. 23, Motion for Leave to Amend its Answer to, Inv#217232d, JH/5356 Vendor=NATIONWIDE LEGAL LLC Balance= .00 Amount= 4273.50 Check #11343692 08/31/2015		
		Voucher=1359699 Paid							
09/08/2015	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES - BANK OF AMERICA - 24,	12028706	Y
09/25/2015		Invoice=9063462		1.00	3.50	3.50	E-File#7268435, 8/7/15, Clark County District Court, Bank of America 's Motion for Leave to Amend its Answer to Add Affirmative Defense and Counterclaim and to Join Parties to Add Claims. JH/5356 Vendor=BANK OF AMERICA Balance= .00 Amount= 18637.76 Check #36064 09/30/2015		
		Voucher=1364074 Paid							
06/08/2016	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES - BANK OF AMERICA - 71,	12216182	Y
11/10/2016		Invoice=9183615		1.00	3.50	3.50	E-File#8173648, 5/12/16, Clark County District Court, Bank of America, N.A.'s Answer to Third Amended Complaint and Counterclaims. JH/5356 Vendor=BANK OF AMERICA Balance= .00 Amount= 18582.66 Check #42752 06/28/2016		
		Voucher=1407850 Paid							
01/09/2017	1709	WILLIAM P. HELLER	272	1.00	3.50	3.50	FILING FEES	12391545	Y
03/15/2017		Invoice=9221779		1.00	3.50	3.50	- BANK OF AMERICA - 367; E-File#9054488; 2/6/17; Clark County District Court; Second Amended Joint Case Conference Report. JH/5356 Vendor=BANK OF AMERICA Balance= .00 Amount= 22584.40 Check #49371 02/28/2017		
		Voucher=1448797 Paid							
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							Check #74595 09/24/2019		
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		BILLED TOTALS: BILL:				2,351.22			
		GRAND TOTAL: WORK:				2,358.40	32 records		
		GRAND TOTAL: BILL:				2,351.22			



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14 **EIGHTH JUDICIAL DISTRICT COURT**

15 **CLARK COUNTY, NEVADA**

16 AIRMOTIVE INVESTMENTS, LLC, a Nevada
17 limited liability company,

18 Plaintiff,

19 v.

20 BANK OF AMERICA, N.A.; GENEVIEVE
21 UNIZA-ENRIQUEZ; DOES 1 through 20; and
22 ROE CORPORATIONS 1 through 20, inclusive

23 Defendants.

24 AND ALL RELATED CLAIMS.

Case No.: A-12-654840-C

Dept. No.: XXIII

NOTICE OF ENTRY OF DECISION AND ORDER

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that a **DECISION AND ORDER** was entered on October 17, 2019, a copy of which is attached hereto as **Exhibit A**.

Dated: October 25, 2019.

AKERMAN LLP

/s/ Jared M. Sechrist

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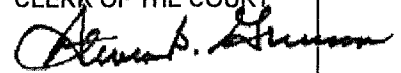
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(ELECTRONIC SERVICE) Pursuant to Administrative Order 14-2, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities to those parties listed on the Court's Master Service List.

Attorneys for Airmotive Investments, LLC

/s/ Patricia Larsen
An employee of AKERMAN LLP

EXHIBIT A



DISTRICT COURT
CLARK COUNTY, NEVADA

AIRMOTIVE INVESTMENTS,
LLC, a Nevada limited liability
Company,

Plaintiff,

v.

BANK OF AMERICA,
GENEVIEVE UNIZA-ENRIQUEZ,
DOES 1 THROUGH 20, AND
ROE CORPORATIONS 1
THROUGH 20, INCLUSIVE,

Defendants.

CASE NO.: A-12-654840-C

DEPARTMENT XXIII

DECISION & ORDER

I. INTRODUCTION

This matter came before the Court on September 10, 2019 for defendant Bank of America's Motion for Summary Judgment against plaintiff Airmotive Investments, LLC's claims for quiet title and declaratory relief. Bank of America also requests Summary Judgment in favor of its own counterclaims for quiet title and declaratory relief against Airmotive Investments, LLC. Defendant Bank of America filed its Motion for Summary Judgment on April 5, 2019. Plaintiff Airmotive Investments, LLC filed its opposition on July 17, 2019. Defendant Bank of America filed its Reply on September 5, 2019.

Bank of America's Reply cites the Nevada Supreme Court's recent binding precedent in *Daisy Trust v. Wells Fargo* in support of its Motion for Summary Judgment. *See infra* p. 4. At the hearing, Plaintiff conceded that per the *Daisy Trust* holding, Fannie Mae does not need to be the beneficiary of record to establish its ownership interest. While it was undisputed the real property in question was owned by Fannie Mae, Plaintiff

STEFANY A. MILEY
DISTRICT JUDGE

DEPARTMENT TWENTY THREE
LAS VEGAS NV 89101-2408

1
2 asserted that defendant Bank of America's Affirmative Defense of the Federal Foreclosure
3 Bar was nonetheless barred, based upon the Statute of Limitations. Furthermore, Plaintiff
4 asserted that Bank of America's counterclaims were also barred by the Statute of
5 Limitations.

6 Having considered the papers on file and the relevant law, the Court enters the
7 following Decision and Order on defendant Bank of America's Motion for Summary
8 Judgment against plaintiff Airmotive Investments, LLC's claims for quiet title and
9 declaratory relief, as well as Bank of America's counterclaims for quiet title and
10 declaratory relief against Airmotive Investments, LLC.
11

12 II. STATEMENT OF FACTS

13 At issue before the Court is real property known as 6279 Downpour Court, Las
14 Vegas, Nevada 89110 (Property). A Deed of Trust listing defendant Genevieve Uniza-
15 Enriquez as the borrower was executed on June 23, 2006, and was recorded on June 30,
16 2006. Fannie Mae became the successor to the Lender and acquired ownership of the Deed
17 of Trust in August 2006 by purchasing the Loan.
18

19 On April 12, 2011, the Property was purchased by Las Vegas Development Group,
20 LLC at a Home Owner's Association (HOA) Foreclosure Sale in accordance with N.R.S.
21 116.3116. Fannie Mae maintained its ownership at the time of the HOA Sale and Bank of
22 America was the servicer of the Loan for Fannie Mae. At no time did Fannie Mae consent
23 to the sale extinguishing or foreclosing its interest in the Property.
24

25 Las Vegas Development Group, LLC filed the instant Complaint on January 17,
26 2012, filed a Second Amended Complaint on August 1, 2013, and filed its Third Amended
27 Complaint on February 29, 2016. Defendant Bank of America first claimed the affirmative
28 defense of The Federal Foreclosure Bar in its Answer to the Second Amended Complaint

1
2 on March 26, 2015. Bank of America also asserted its counterclaims against Plaintiff at
3 that time.

4 Las Vegas Development Group, LLC conveyed its interest in the Property to
5 Plaintiff through a recorded Grant Deed on March 7, 2017.

6 III. DISCUSSION

7 A. Legal Standard

8 Rule 56(a) of the Nevada Rules of Civil Procedure governs Motions for Summary
9 Judgment. NRCP 56(a). The pleadings, depositions, answers to interrogatories,
10 admissions, and affidavits, if any, that are properly before the court must demonstrate that
11 no genuine issue of material fact exists, and the moving party is entitled to judgment as a
12 matter of law. *See Id.*; *Wood v. Safeway*, 121 P.3d 1026 (Nev. 2005). A court must accept
13 the nonmoving party's properly supported factual allegations as true, and it must draw all
14 reasonable inferences in the nonmoving party's favor. *Michaels v. Sudeck*, 810 P.2d 1212,
15 1213 (Nev. 1991).
16

17
18 In determining whether a fact is material, the court shall look to the substantive law
19 of the claims and only disputes over facts that might affect the outcome of the suit under
20 the governing law will properly preclude the entry of summary judgment. *Wood*, 121 P.3d
21 at 1030. Nevada courts no longer follow the "slightest doubt" standard that applied before
22 *Wood*; the courts follow the federal summary judgment standard. *Id.* at 1031, 1037.
23

24 B. Defendant Bank of America's Motion for Summary Judgment against 25 plaintiff Airmotive Investments, LLC's claims for quiet title and declaratory 26 relief

27 1. The Federal Foreclosure Bar Applies

28 HOAs are provided with a "superpriority" lien pursuant to NRS 116.3116(2) that,
when properly foreclosed, extinguishes a first deed of trust. *SFR Investments Pool 1, LLC*

1 v. *U.S. Bank, N.A.*, 130 Nev. 742 (Nev. 2014); NRS 116.3116(2). Commonly known as the
2 Federal Foreclosure Bar, 12 U.S.C. § 4617 (HERA) has a provision stating “No property
3 of the Agency shall be subject to levy, attachment, garnishment, foreclosure, or sale
4 without the consent of the Agency, nor shall any involuntary lien attach to the property of
5 the Agency.” 12 U.S.C. § 4617(j)(3) (2012). This preempts NRS 116.3116(2) and
6 prevents an HOA foreclosure sale from extinguishing the first deed of trust in those
7 circumstances. *Saticoy Bay LLC Series 9641 Christine View v. Federal National Mortgage*
8 *Ass’n*, 417 P.3d 363, 367-68 (Nev. 2018).

9
10
11 After Bank of America filed its Motion for Summary Judgment, but before the
12 present hearing before the Court, the Nevada Supreme Court provided further guidance to
13 the District Courts on claims involving Fannie Mae or Freddie Mac. In *Daisy Trust v.*
14 *Wells Fargo Bank, N.A.* the Nevada Supreme Court held that Fannie Mae and Freddie Mac
15 need not be the beneficiary of record to establish their ownership interests. *Daisy Tr. V.*
16 *Wells Fargo Bank, N.A.*, 445 P.3d 846, 849 (Nev. 2019). Furthermore, the deed of trust
17 beneficiary is not required to produce the loan servicing agreement or original promissory
18 note in order to establish that Fannie Mae or Freddie Mac owned the loan at the time of the
19 foreclosure sale, and that the Federal Foreclosure Bar prevents any sale from extinguishing
20 the deed of trust. *Id.* at 849-50. The Nevada Supreme Court has affirmed a recent summary
21 judgment decision from this Court based on the *Daisy Trust* holding. *RH Kids, LLC v.*
22 *Nationstar Mortg., LLC*, No. 76300, 2019 WL 4390764, at *1 (Nev. Sept. 12, 2019).

23
24
25 **2. Neither Bank of America’s Federal Foreclosure Bar Defense nor its**
26 **counterclaims are untimely.**

27 Any action brought by FHFA is governed by the statute of limitations set forth in
28 HERA. These timing requirements are stated as follows:

1
2 (12) Statute of limitations for actions brought by conservator or receiver

3 (A) In general

4 Notwithstanding any provision of any contract, the applicable statute of
5 limitations with regard to any action brought by the Agency as conservator
6 or receiver shall be—

7 (i) in the case of any contract claim, the longer of—

8 (I) the 6-year period beginning on the date on which the claim
9 accrues; or

10 (II) the period applicable under State law; and

11 (ii) in the case of any tort claim, the longer of—

12 (I) the 3-year period beginning on the date on which the claim
13 accrues; or

14 (II) the period applicable under State law.

15 12 U.S.C. §4617(b)(12). In the case of contract claims, FHFA must bring suit within six
16 years from the time the claim accrued. FHFA must bring claims within three years from
17 the time the claim accrued for any torts claims.

18 In Nevada, NRS 11.190 governs the statute of limitations for most claims arising
19 under Nevada law. Relevant here, NRS 11.190 defines the statute of limitations as three
20 years for “an action upon a liability created by statute, other than a penalty or forfeiture.”
21 NRS 11.190(3)(a). The Nevada Revised Statutes apply a four-year statute of limitation for
22 “an action for relief, not hereinbefore provided for.” NRS 11.220. This “catch-all” time
23 frame has been applied for equitable quiet-title claims brought by Freddie Mac, rather
24 than the three-year statute of limitation in NRS 11.190(3)(a). *See Fed. House. Fin. Agency*
25 *v. LN Mgmt. LLC, Series 2937 Barboursville*, 369 F. Supp. 3d 1101, 1111 (D. Nev. 2019).

26 A five-year period exists under NRS 11.070 and NRS 11.080, both statutes relating
27 to the possession of real property. NRS 11.070 states:

28 No cause of action or defense to an action, **founded upon the title to real
property**, or to rents or to services out of the same, shall be effectual,
unless it appears **that the person prosecuting the action or making the
defense**, or under whose title the action is prosecuted or the defense is
made, or the ancestor, predecessor, **or grantor of such person**, was seized
or possessed of the premises in question within 5 years before the

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committing of the act in respect to which said action is prosecuted or defense made.

NRS 11.070 (emphases added). NRS 1.080 states:

No action for the recovery of real property, or for the recovery of the possession thereof other than mining claims, shall be maintained, unless it appears that the plaintiff or the plaintiff's ancestor, predecessor or grantor was seized or possessed of the premises in question, within 5 years before the commencement thereof.

NRS 11.080.

Plaintiff does not deny that the *Daisy Trust* holding applies to the present facts.

Plaintiff does, however, assert that defendant Bank of America's Federal Foreclosure Bar defense is untimely. Bank of America filed its Federal Foreclosure Bar defense along with its counterclaims in March 2015, just under four years after the HOA Sale in April 2011. Plaintiff argues that Bank of America's raised defense is based upon neither contract nor tort. Rather, being premised upon statute, the Federal Foreclosure Bar is subject to a three-year statute of limitations pursuant to NRS 11.190. Because neither Bank of America nor Fannie Mae asserted the Federal Foreclosure Bar as a defense until March 26, 2015, more than three years after the HOA Foreclosure Sale, Plaintiff believes this defense is untimely. Plaintiff asks the Court to deny Bank of America's Motion for Summary Judgment against Plaintiff's claims for that reason.

Plaintiff next argues that because Bank of America's counterclaims are for declaratory relief, and are premised upon HERA, they are also subject to a three-year statute of limitations. Like the Federal Foreclosure Bar defense, the counterclaims were not asserted until March 26, 2015, more than three years after the HOA Foreclosure Sale. Because these claims are premised upon a statute they are subject to the three-year statute of limitations allowed under NRS 11.190 and this Court should deny Bank of America's Motion for Summary Judgment in regard to its counterclaims.

1
2 In response Bank of America claims that its invocation of the Federal Foreclosure
3 Bar as a defense to Plaintiff's claims is not subject to a statute of limitations period.
4 Raising the defense against a quiet title claim such as this one is not itself a stand-alone
5 claim. *Nationstar Mortgage, LLC v. SFR Investments Pool 1, LLC*, 396 P.3d 754, 757-58
6 (Nev. 2017) (Recognizing that arguing property owned by Freddie Mac is not subject to
7 foreclosure while it is in conservatorship under federal law based on the Supremacy
8 Clause is not akin to asserting a cause of action). Bank of America further asserts that if
9 any statute of limitations applies, it would be the six-year limitation found in HERA. 12
10 U.S.C. § 4617(b)(12)(A).
11

12 Bank of America points out that while a quiet-title claim does not fit neatly into the
13 "contract" or "tort" category provided by HERA, it is closer to the contract category
14 because it seeks to validate a contractually created interest in the Property. The
15 counterclaims and defenses arise from the contractual relationship between the borrower
16 and the lender when creating the loan, which was purchased by Fannie Mae in August
17 2006. "Because a mortgage lien is an interest in property created by contract, an action to
18 enforce that lien is clearly a contract action." *Smith v. FDIC*, 61 F.3d 1552, 1561 (11th Cir.
19 1995). This means that the invocation of the Federal Foreclosure Bar is subject to the six-
20 year statute of limitations prescribed by HERA and Bank of America's defense is timely.
21

22 Further, even if the Court cannot classify Bank of America's quiet-title
23 counterclaim as either a tort or contract claim, Bank of America points this Court to two
24 Ninth Circuit cases as support for its argument that the longer statute of limitations should
25 apply in the event of ambiguity. When there is a substantial question regarding which
26 statute of limitations should apply between two conflicting statutes, the court should apply
27 the longer. *FDIC v. Former Officers & Directors of Metro. Bank*, 884 F.2d 1304, 1307
28

1 (9th Cir. 1989). More recently in *Wise v. Verizon Communications*, the Ninth Circuit
2 stated that even if they were not bound by precedence, they would have chosen the longer
3 statute of limitations when presented with multiple potentially-applicable statutes. *Wise v.*
4 *Verizon Commc'ns, Inc.*, 600 F.3d 1180, 1187 n.2 (9th Cir. 2010). While neither of these
5 cases apply to HERA, the *FDIC* court evaluated very similar statute of limitations
6 provided to the FDIC in its capacity as a government agency where the FDIC's breach of
7 fiduciary duty claims were being characterized as either tort or contract.
8

9
10 Bank of America lastly asserts that at minimum, the statute of limitations would be
11 five or four years. The counterclaim brought by Bank of America is for quiet title. The
12 claims here satisfy the elements of NRS 11.070. The present dispute is whether the HOA
13 conveyed clear title to the buyer, or whether the deed of trust owned by Fannie Mae
14 continued to encumber the buyer's title. Fannie Mae's "grantor" is the former borrower,
15 who was "seized or possessed of the premises" once the home was sold at the HOA
16 Foreclosure Sale. And because NRS 11.070 applies to either a quiet title plaintiff, or to the
17 "grantor", the five-year statute of limitations would apply.
18

19 Bank of America also points to the broad statutory language of NRS 11.080 and
20 says that the Nevada Supreme Court has applied its five-year limitations in a case
21 involving a dispute between a lienholder and a purchaser at an HOA Foreclosure Sale. *See*
22 *Saticoy Bay LLC Series 2021 Gray Eagle Way v. JPMorgan Chase Bank, N.A.*, 388 P.3d
23 226, 232 (Nev. 2017). Finally, the four-year "catch-all" statute of limitations from NRS
24 11.220 should apply at a bare minimum. Because Bank of America asserted its Federal
25 Foreclosure Bar defense and filed its counterclaims within four years of the HOA
26 Foreclosure Sale, its actions are timely and the Court should grant Bank of America's
27
28

1
2 motion for summary judgment and enter a declaration that Plaintiff's interest in the
3 Property is subject to the deed of trust.

4 Based on the foregoing, COURT FINDS, there is no genuine issue of material fact
5 the subject loan was owned by Fannie Mae at the time of the HOA sale. Further, COURT
6 FINDS, there is no genuine issue of material fact Fannie Mae did not consent to the HOA
7 sale per NRS Chapter 116.

8 COURT FINDS, Defendant Bank of America's Federal Foreclosure Bar defense is
9 not barred by the statute of limitations. Plaintiff has failed to convince the Court that the
10 defense should be barred at all, as it is not a stand-alone action. Even if a statute of
11 limitations attaches to the action, COURT FINDS, that at a minimum the statute of
12 limitations would be the four-year period prescribed in NRS 11.220. Pursuant to the
13 Nevada Supreme Court's holding in *Daisy Trust v. Wells Fargo*, COURT FINDS, that the
14 Federal Foreclosure Bar precluded Plaintiff from acquiring title to the Property free and
15 clear of Fannie Mae's property interest.

16 Based on Fannie Mae's ownership of the Deed of Trust in the Property and Bank
17 of America timely asserting the Federal Foreclosure Bar, COURT ORDERS, defendant
18 Bank of America's Motion for Summary Judgment on plaintiff Airmotive Investments,
19 LLC's claims for quiet title and declaratory relief is GRANTED.

20 COURT FINDS, that defendant Bank of America's counterclaims for quiet title
21 and declaratory relief against plaintiff are timely as they fall within NRS 11.220's four-
22 year limitation period and were brought within four years from the HOA Foreclosure Sale.
23 Further, there are no genuine issues of material fact related to defendant Bank of
24 America's Motion for Summary Judgment on its counterclaims for quiet title and
25 declaratory relief against Plaintiff Airmotive Investments, LLC.
26
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1
2 Therefore, COURT ORDERS, defendant Bank of America's Motion for Summary
3 Judgment on its counterclaims for quiet title and declaratory relief against Plaintiff is
4 GRANTED.

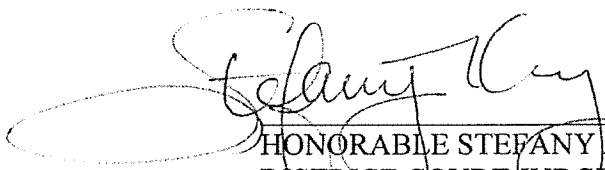
5 It is so ORDERED.

6
7 **IV. ORDER**

8 For the foregoing reasons, COURT HEREBY ORDERS, Defendant's Motion for
9 Summary Judgment as to Plaintiff's Claims for quiet title and declaratory relief is
10 GRANTED.

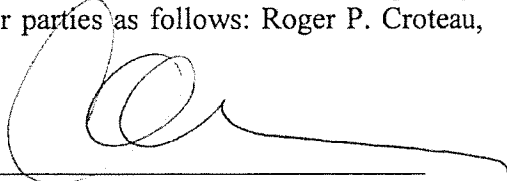
11 COURT FURTHER ORDERS, Defendant's Motion for Summary Judgment as to
12 Defendant's counterclaims for quiet title and declaratory relief is GRANTED.

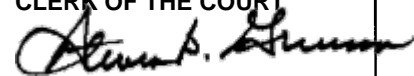
13
14 Dated this ____ day of ¹⁰⁻¹⁷⁻¹⁹ September, 2018.

15
16
17 
18 HONORABLE STEFANY A. MILEY
19 DISTRICT COURT JUDGE
20 DEPARTMENT XXIII

21 **CERTIFICATE OF SERVICE**

22 I hereby certify that on or about the date signed, a copy of this Decision and
23 Order was electronically served and/or placed in the attorney's folders maintained
24 by the Clerk of the Court and/or transmitted via facsimile and/or mailed, postage
25 prepaid, by United States mail to the proper parties as follows: Roger P. Croteau,
26 Esq., and Darren T. Brenner, Esq.

27
28 By: 
Carmen Alper
Judicial Executive Assistant
Department XXIII



ORDR

DARREN T. BRENNER, ESQ.

Nevada Bar No. 8386

SCOTT R. LACHMAN, ESQ.

Nevada Bar No. 12016

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Attorneys for Bank of America, N.A.

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

AIRMOTIVE INVESTMENTS, LLC, a Nevada
limited liability company,

Plaintiff,

v.

BANK OF AMERICA, N.A.; GENEVIEVE
UNIZA-ENRIQUEZ; DOES 1 through 20, and
ROE CORPORATIONS 1 through 20, inclusive,

Defendants.

Case No.: A-12-654840-C

Dept. No.: XXIII

**ORDER AWARDING COSTS TO BANK
OF AMERICA, N.A.**

AND ALL RELATED CLAIMS.

Bank of America, N.A. (**BANA**) submitted a memorandum of costs on October 21, 2019. Airmotive Investments, LLC did not file a motion to retax or opposition to the memorandum of costs. This Court **FINDS** BANA's requested costs totaling \$2,761.34 were reasonable, necessary, and actually incurred. *Cadle Co. v. Woods & Erickson, LLP*, 131 Nev. 114, 120, 345 P.3d 1049,


///

///

///

1 1054 (2015); *see* NRS 18.020(5). This Court **AWARDS** \$2,761.34 to BANA and **ORDERS**
2 Airmotive to pay the award to BANA through its counsel, Akerman LLP.


3
4 DATED 11-21-19, 2019.

5
6 
DISTRICT COURT JUDGE
Case Number: A-12-654840-C

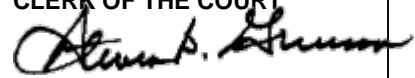
7
8 JUDGE STEFANY A. MILEY

Submitted by:

9 **AKERMAN LLP**

10 
11 DARREN T. BRENNER, ESQ.
Nevada Bar No. 8386
12 SCOTT R. LACHMAN, ESQ.
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Las Vegas, Nevada 89134

14 *Attorneys for Bank of America, N.A.*
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1 **NEO**
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11 Email: darren.brenner@akerman.com
12 Email: scott.lachman@akerman.com
13
14 *Attorneys for Bank of America, N.A.*

10 **EIGHTH JUDICIAL DISTRICT COURT**
11 **CLARK COUNTY, NEVADA**

13 **AIRMOTIVE INVESTMENTS, LLC, a Nevada**
14 **limited liability company,**

15 **Plaintiff,**

16 **v.**

17 **BANK OF AMERICA, N.A.; GENEVIEVE**
18 **UNIZA-ENRIQUEZ; DOES 1 through 20, and**
19 **ROE CORPORATIONS 1 through 20, inclusive,**

20 **Defendants.**

21 **AND ALL RELATED CLAIMS.**

Case No.: A-12-654840-C

Dept. No.: XXIII

**NOTICE OF ENTRY OF ORDER
AWARDING COSTS TO BANK OF
AMERICA, N.A.**

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that an **ORDER AWARDING COSTS TO BANK OF**
3 **AMERICA, N.A.** has been entered by this Court on the 25th day of November, 2019, in the above-
4 captioned matter. A copy of said Order is attached hereto as **Exhibit A.**

5
6 Dated: November 27, 2019

7
8 **AKERMAN LLP**

9 /s/ Scott R. Lachman, ESQ.
10 DARREN T. BRENNER, ESQ.
11 Nevada Bar No. 8386
12 SCOTT R. LACHMAN, ESQ.
13 Nevada Bar No. 12016
14 1635 Village Center Circle, Suite 200
15 Las Vegas, Nevada 89134

16 *Attorneys for Bank of America, N.A.*
17
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I HEREBY CERTIFY that I am an employee of AKERMAN LLP, and that on this 27th day of November, 2019, I caused to be served a true and correct copy of the foregoing **NOTICE OF ENTRY OF ORDER AWARDING COSTS TO BANK OF AMERICA, N.A.**, in the following manner:

(ELECTRONIC SERVICE) Pursuant to Administrative Order 14-2, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities to those parties listed on the Court's Master Service List as follows:

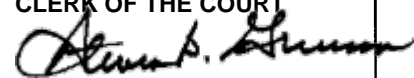
Roger P. Croteau, Esq.
Timothy E. Rhoda, Esq.
ROGER P. CROTEAU & ASSOCIATES, LTD.
2810 W. Charleston Blvd. #75
Las Vegas, NV 89102

Attorneys for Airmotive Investments, LLC

An employee of AKERMAN LLP

EXHIBIT A

EXHIBIT A



ORDR

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Email: scott.lachman@akerman.com

Attorneys for Bank of America, N.A.

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

AIRMOTIVE INVESTMENTS, LLC, a Nevada
limited liability company,

Plaintiff,

v.

BANK OF AMERICA, N.A.; GENEVIEVE
UNIZA-ENRIQUEZ; DOES 1 through 20, and
ROE CORPORATIONS 1 through 20, inclusive,

Defendants.

Case No.: A-12-654840-C

Dept. No.: XXIII

**ORDER AWARDING COSTS TO BANK
OF AMERICA, N.A.**

AND ALL RELATED CLAIMS.

Bank of America, N.A. (**BANA**) submitted a memorandum of costs on October 21, 2019. Airmotive Investments, LLC did not file a motion to retax or opposition to the memorandum of costs. This Court **FINDS** BANA's requested costs totaling \$2,761.34 were reasonable, necessary, and actually incurred. *Cadle Co. v. Woods & Erickson, LLP*, 131 Nev. 114, 120, 345 P.3d 1049,


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1 1054 (2015); *see* NRS 18.020(5). This Court **AWARDS** \$2,761.34 to BANA and **ORDERS**
2 Airmotive to pay the award to BANA through its counsel, Akerman LLP.


3
4 DATED 11-21-19, 2019.

5
6 
DISTRICT COURT JUDGE
Case Number: A-12-654840-C

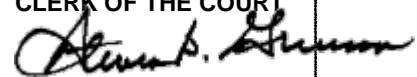
7
8 JUDGE STEFANY A. MILEY

Submitted by:

9 **AKERMAN LLP**

10 
11 DARREN T. BRENNER, ESQ.
12 Nevada Bar No. 8386
13 SCOTT R. LACHMAN, ESQ.
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17 *Attorneys for Bank of America, N.A.*
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1 **SAO**
2 ROGER P. CROTEAU, ESQ.
3 Nevada Bar No. 4958
4 TIMOTHY E. RHODA, ESQ.
5 Nevada Bar No. 7878
6 ROGER P. CROTEAU & ASSOCIATES, LTD.
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10 (702) 228-7719 (facsimile)
11 croteaulaw@croteaulaw.com
12 **Attorney for Plaintiff**
13 **LAS VEGAS DEVELOPMENT GROUP, LLC**

10 DISTRICT COURT
11 CLARK COUNTY, NEVADA

12 ***

13 AIRMOTIVE INVESTMENTS, LLC, a Nevada)
14 limited liability company,)

15 Plaintiff,)

Case No. A-12-654840-C
Dept. No. XXIII

16 vs.)

17 BANK OF AMERICA, GENEVIEVE UNIZA-)
18 ENRIQUEZ, DOES 1 THROUGH 20, AND)
19 ROE CORPORATIONS 1 THROUGH 20,)
20 INCLUSIVE,)

21 Defendants.)

22 BANK OF AMERICA, N.A.)

23 Counterclaimant,)

24 vs.)

25 AIRMOTIVE INVESTMENTS, LLC,)

26 Counter-Defendant.)

<input type="checkbox"/> Voluntary Dismissal	<input type="checkbox"/> Summary Judgment
<input type="checkbox"/> Involuntary Dismissal	<input type="checkbox"/> Stipulated Judgment
<input checked="" type="checkbox"/> Stipulated Dismissal	<input type="checkbox"/> Default Judgment
<input type="checkbox"/> Motion to Dismiss by Deft(s)	<input type="checkbox"/> Judgment of Arbitration

27 **STIPULATION AND ORDER TO DISMISS AND FOR FINAL JUDGMENT**

28 COMES NOW, Plaintiff/Counter-Defendant, AIRMOTIVE INVESTMENTS, LLC
("Airmotive"), and Defendant/Counterclaimant, BANK OF AMERICA, N.A. ("BANA"), by and

through their undersigned counsel of record, and hereby stipulate and agree as follows:

1. On October 17, 2019, this Court entered a Decision and Order granting BANA's Motion for Summary Judgment as to (1) Airmotive's claims for Quiet Title and Declaratory Relief and (2) BANA's counterclaims for Quiet Title and Declaratory Relief.
2. Remaining unresolved and pending are Airmotive's claims for unjust enrichment; equitable mortgage; temporary restraining order/injunctive relief; and slander of title, as well as BANA's counterclaim for unjust enrichment.
3. Airmotive's claims for unjust enrichment; equitable mortgage; temporary restraining order/injunctive relief; and slander of title, as well as BANA's counterclaim for unjust enrichment shall be dismissed with prejudice in their entirety.
4. Defendant, Genevieve Uniza-Enriquez, has neither answered nor appeared herein to date. Airmotive hereby dismisses its claims against said Defendant in their entirety without prejudice.
5. All claims herein having been fully adjudicated as to all parties, the instant action


may be closed.
DATED this 17 day of December, 2019.

ROGER P. CROTEAU &
ASSOCIATES, LTD.


TIMOTHY E. RHODA, ESQ.
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9120 West Post Road, Suite 100
Las Vegas, Nevada 89148
croteaulaw@croteaulaw.com
Attorney for Plaintiff/Counter-Defendant
**LAS VEGAS DEVELOPMENT GROUP,
LLC**

DATED this 4 day of December, 2019.

AKERMAN, LLP


SCOTT R. LACHMAN, ESQ.
Nevada Bar No. 12016
1635 Village Center Circle, Suite 200
Las Vegas, Nevada 89134
scott.lachman@akerman.com
Attorneys for Defendant/Counterclaimant
BANK OF AMERICA, N.A.

ORDER

Having reviewed the stipulation of the parties, and good cause appearing therefor,

IT IS HEREBY ORDERED that Airmotive's claims for unjust enrichment; equitable mortgage; temporary restraining order/injunctive relief; and slander of title, as well as BANA's counterclaim for unjust enrichment shall be dismissed with prejudice in their entirety.

IT IS FURTHER ORDERED that Defendant, Genevieve Uniza-Enriquez, has neither answered nor appeared herein to date and that Airmotive's claims against said Defendant are hereby dismissed in their entirety without prejudice.

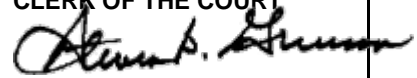
IT IS FURTHER ORDERED that, all claims at issue herein having been adjudicated, the instant action shall be closed.

Dated this _____ day of November, 2019.

12-10-19


DISTRICT COURT JUDGE

JUDGE STEFANY A. MILEY



NEOJ
ROGER P. CROTEAU, ESQ.
Nevada Bar No. 4958
TIMOTHY E. RHODA, ESQ.
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Attorney for Plaintiff
AIRMOTIVE INVESTMENTS, LLC

DISTRICT COURT
CLARK COUNTY, NEVADA

AIRMOTIVE INVESTMENTS, LLC, a Nevada)
limited liability company,)

Plaintiff,)

Case No. A-12-654840-C
Dept. No. XXIII

vs.)

BANK OF AMERICA, GENEVIEVE UNIZA-)
ENRIQUEZ, DOES 1 THROUGH 20, AND)
ROE CORPORATIONS 1 THROUGH 20,)
INCLUSIVE,)

Defendants.)

BANK OF AMERICA, N.A.)

Counterclaimant,)

vs.)

AIRMOTIVE INVESTMENTS, LLC,)

Counter-Defendant.)

NOTICE OF ENTRY OF ORDER

PLEASE TAKE NOTICE that a **STIPULATION AND ORDER TO DISMISS AND**
FOR FINAL JUDGMENT was entered in the above-entitled matter on or about the 12th day of

//

1 December, 2019, a copy of which is attached hereto.

2 DATED this 18th day of December, 2019.

3 ROGER P. CROTEAU & ASSOCIATES, LTD.

4
5 /s/ Timothy E. Rhoda
6 ROGER P. CROTEAU, ESQ.
7 Nevada Bar No. 4958
8 TIMOTHY E. RHODA, ESQ.
9 Nevada Bar No. 7878
10 9120 West Post Road, Suite 100
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12 (702) 254-7775
13 *Attorney for Plaintiff*
14 **AIRMOTIVE INVESTMENTS, LLC**
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 X VIA ELECTRONIC SERVICE: through the Eighth Judicial District Court's Odyssey e-file and serve system.

____ VIA FACSIMILE: by causing a true copy thereof to be telecopied to the number indicated on the service list below.

____ VIA PERSONAL DELIVERY: by causing a true copy hereof to be hand delivered on this date to the addressee(s) at the address(es) set forth on the service list below.

/s/ Timothy E. Rhoda
An employee of ROGER P. CROTEAU &
ASSOCIATES, LTD.

EXHIBIT 1

EXHIBIT 1



1 **SAO**
2 ROGER P. CROTEAU, ESQ.
3 Nevada Bar No. 4958
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11 croteaulaw@croteaulaw.com
12 **Attorney for Plaintiff**
13 **LAS VEGAS DEVELOPMENT GROUP, LLC**

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DISTRICT COURT
CLARK COUNTY, NEVADA

AIRMOTIVE INVESTMENTS, LLC, a Nevada)
limited liability company,)

Plaintiff,)

Case No. A-12-654840-C
Dept. No. XXIII

vs.)

BANK OF AMERICA, GENEVIEVE UNIZA-)
ENRIQUEZ, DOES 1 THROUGH 20, AND)
ROE CORPORATIONS 1 THROUGH 20,)
INCLUSIVE,)

Defendants.)

BANK OF AMERICA, N.A.)

Counterclaimant,)

vs.)

AIRMOTIVE INVESTMENTS, LLC,)

Counter-Defendant.)

<input type="checkbox"/> Voluntary Dismissal	<input type="checkbox"/> Summary Judgment
<input type="checkbox"/> Involuntary Dismissal	<input type="checkbox"/> Stipulated Judgment
<input checked="" type="checkbox"/> Stipulated Dismissal	<input type="checkbox"/> Default Judgment
<input type="checkbox"/> Motion to Dismiss by Deft(s)	<input type="checkbox"/> Judgment of Arbitration

STIPULATION AND ORDER TO DISMISS AND FOR FINAL JUDGMENT

COMES NOW, Plaintiff/Counter-Defendant, AIRMOTIVE INVESTMENTS, LLC
("Airmotive"), and Defendant/Counterclaimant, BANK OF AMERICA, N.A. ("BANA"), by and

1 through their undersigned counsel of record, and hereby stipulate and agree as follows:

- 2 1. On October 17, 2019, this Court entered a Decision and Order granting BANA's
- 3 Motion for Summary Judgment as to (1) Airmotive's claims for Quiet Title and
- 4 Declaratory Relief and (2) BANA's counterclaims for Quiet Title and Declaratory
- 5 Relief.
- 6 2. Remaining unresolved and pending are Airmotive's claims for unjust enrichment;
- 7 equitable mortgage; temporary restraining order/injunctive relief; and slander of
- 8 title, as well as BANA's counterclaim for unjust enrichment.
- 9 3. Airmotive's claims for unjust enrichment; equitable mortgage; temporary
- 10 restraining order/injunctive relief; and slander of title, as well as BANA's
- 11 counterclaim for unjust enrichment shall be dismissed with prejudice in their
- 12 entirety.
- 13 4. Defendant, Genevieve Uniza-Enriquez, has neither answered nor appeared herein
- 14 to date. Airmotive hereby dismisses its claims against said Defendant in their
- 15 entirety without prejudice.
- 16 5. All claims herein having been fully adjudicated as to all parties, the instant action

may be closed.

17 DATED this 17 day of December, 2019.

18 ROGER P. CROTEAU &
19 ASSOCIATES, LTD.

20
21
22 TIMOTHY E. RHODA, ESQ.
Nevada Bar No. 7878
23 9120 West Post Road, Suite 100
Las Vegas, Nevada 89148
24 croteaulaw@croteaulaw.com
25 *Attorney for Plaintiff/Counter-Defendant*
LAS VEGAS DEVELOPMENT GROUP,
26 LLC

27 DATED this 4 day of December, 2019.

28 AKERMAN, LLP

SCOTT R. LACHMAN, ESQ.
Nevada Bar No. 12016
1635 Village Center Circle, Suite 200
Las Vegas, Nevada 89134
scott.lachman@akerman.com
Attorneys for Defendant/Counterclaimant
BANK OF AMERICA, N.A.

ORDER

Having reviewed the stipulation of the parties, and good cause appearing therefor,

IT IS HEREBY ORDERED that Airmotive's claims for unjust enrichment; equitable mortgage; temporary restraining order/injunctive relief; and slander of title, as well as BANA's counterclaim for unjust enrichment shall be dismissed with prejudice in their entirety.

IT IS FURTHER ORDERED that Defendant, Genevieve Uniza-Enriquez, has neither answered nor appeared herein to date and that Airmotive's claims against said Defendant are hereby dismissed in their entirety without prejudice.

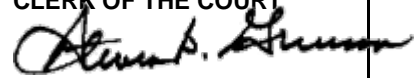
IT IS FURTHER ORDERED that, all claims at issue herein having been adjudicated, the instant action shall be closed.

Dated this _____ day of November, 2019.

12-10-19


DISTRICT COURT JUDGE

JUDGE STEFANY A. MILEY



1 **NOAS**
2 ROGER P. CROTEAU, ESQ.
3 Nevada Bar No. 4958
4 TIMOTHY E. RHODA, ESQ.
5 Nevada Bar No. 7878
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10 (702) 228-7719 (facsimile)
11 croteaulaw@croteaulaw.com
12 *Attorney for Plaintiff*
13 **AIRMOTIVE INVESTMENTS, LLC**

9 DISTRICT COURT
10 CLARK COUNTY, NEVADA

11 ***

12 AIRMOTIVE INVESTMENTS, LLC, a Nevada)
13 limited liability company,)

14 Plaintiff,)

Case No. A-12-654840-C
Dept. No. XXIII

15 vs.)

16 BANK OF AMERICA, GENEVIEVE UNIZA-)
17 ENRIQUEZ, DOES 1 THROUGH 20, AND)
18 ROE CORPORATIONS 1 THROUGH 20,)
19 INCLUSIVE,)

20 Defendants.)

21 BANK OF AMERICA, N.A.)

22 Counterclaimant,)

23 vs.)

24 AIRMOTIVE INVESTMENTS, LLC,)

25 Counter-Defendant.)

26 **NOTICE OF APPEAL**

27 NOTICE IS HEREBY GIVEN that Plaintiff/Counter-Defendant, AIRMOTIVE
28 INVESTMENTS, LLC, by and through its attorneys, ROGER P. CROTEAU & ASSOCIATES,
LTD., hereby appeals to the Supreme Court of the State of Nevada from (1) the Decision and

1 Order entered on or about October 17, 2019; (2) the Order Awarding Costs to Bank of America,
2 N.A. entered on or about November 25, 2019; (3) the Stipulation and Order to Dismiss and for
3 Final Judgment entered on or about December 12, 2019; and (4) all rulings and interlocutory
4 orders giving rise to or made appealable by said final judgment.

5 DATED this 2nd day of January, 2020.

6 ROGER P. CROTEAU & ASSOCIATES, LTD.

7
8 /s/ Timothy E. Rhoda
9 ROGER P. CROTEAU, ESQ.
10 Nevada Bar No. 4958
11 TIMOTHY E. RHODA, ESQ.
12 Nevada Bar No. 7878
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16 *Attorney for Plaintiff*
17 **AIRMOTIVE INVESTMENTS, LLC**
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 X VIA ELECTRONIC SERVICE: through the Eighth Judicial District Court's Odyssey e-file and serve system.

 VIA U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, addressed as indicated on service list below in the United States mail at Las Vegas, Nevada.

 VIA FACSIMILE: by causing a true copy thereof to be telecopied to the number indicated on the service list below.

 VIA PERSONAL DELIVERY: by causing a true copy hereof to be hand delivered on this date to the addressee(s) at the address(es) set forth on the service list below.

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