

IAN CHRISTOPHERSON, ESQ.
Nevada Bar No. 3701
600 South Third Street
Las Vegas, NV 89101
Email: iclaw44@gmail.com
Telephone: (702) 372-9649
Attorneys for Defendant, Leonidas P. Flangas

Electronically Filed
Jun 26 2020 09:01 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

DISTRICT COURT
CLARK COUNTY, NEVADA

PERFEKT MARKETING L.L.C, an Arizona
limited liability company,

Case No.: A-19-788870-F
Dept. No.: VIII

Plaintiff,

v.

LEONIDAS P. FLANGAS, an individual;
ATLANTIS CONCIERGE SERVICES, LLC, a
Nevada limited liability company; DIAMOND
DESTINATIONS, LLC, a Nevada limited
liability company,

Defendants.

NOTICE OF APPEAL

Notice is hereby given that LEONIDAS P. FLANGAS, Defendant by and through his attorney,
IAN CHRISTOPHERSON, ESQ., hereby appeals to the Supreme Court of Nevada from the ORDER
DENYING DEFENDANT LEONIDAS P. FLANGAS' MOTION TO STRIKE OR RELIEF FROM
VOID JUDGMENT entered in this action on the 5th day of June, 2020.

Dated this 20 day of June 2020.

/s/ Ian Christopherson
IAN CHRISTOPHERSON, ESQ.
Nevada Bar No. 3701
Iclaw44@gmail.com
Attorney for Defendant
LEONIDAS P. FLANGAS

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I hereby certify that on this 20th day of June, 2020, service of the
3 NOTICE OF APPEAL was made by depositing a true and correct copy of the same service was
4 made U.S. Mail and by submission to the electronic filing service for the Clark County Nevada
5 Eighth Judicial Court upon all the parties registered to the District Court Electronic Filing Program
6 addressed to the following:
7

8 VERNON A. NELSON, JR., ESQ.
9 6787 W. Tropicana Ave, #103
10 Las Vegas, NV 89103
Attorney for Plaintiff

11 /s/ Ian Christopherson
12 IAN CHRISTOPHERSON, ESQ.
13
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CASE SUMMARY**CASE NO. A-19-788870-F****Perfekt Marketing, LLC, Plaintiff(s)
vs. Leonidas Flangas, Defendant(s)**§
§
§
§
§Location: **Department 8**
Judicial Officer: **Atkin, Trevor**
Filed on: **02/05/2019**
Case Number History:
Cross-Reference Case Number: **A788870****CASE INFORMATION****Statistical Closures**
02/05/2019 Default JudgmentCase Type: **Foreign Judgment**Case Status: **02/05/2019 Closed****DATE****CASE ASSIGNMENT****Current Case Assignment**Case Number A-19-788870-F
Court Department 8
Date Assigned 09/30/2019
Judicial Officer Atkin, Trevor**PARTY INFORMATION****Plaintiff****Perfekt Marketing, LLC***Lead Attorneys***Nelson, Vernon A.**
Retained
702-476-2500(W)**Defendant****Atlantis Concierge Services, LLC****Diamond Destinations, LLC****Flangas, Leonidas****Christopherson, Ian**
Retained
702-385-9094(W)**DATE****EVENTS & ORDERS OF THE COURT****INDEX****EVENTS**

02/05/2019

Application of Foreign Judgment - NRS 17
Filed By: Plaintiff Perfekt Marketing, LLC
Application of Foreign Judgment

02/06/2019

Notice
Filed By: Plaintiff Perfekt Marketing, LLC
Notice of Filing Application of Foreign Judgment and Affidavit of Judgment

02/06/2019

Affidavit of Service
Filed By: Plaintiff Perfekt Marketing, LLC
Affidavit of Service of Notice of Filing Application of Foreign Judgment and Affidavit of Judgment

04/29/2019

Case Reassigned to Department 8
Judicial Reassignment to Department 8 - Vacant DC8 Judge

06/12/2019

Affidavit of Service
Filed By: Plaintiff Perfekt Marketing, LLC

CASE SUMMARY
CASE NO. A-19-788870-F

Affidavit of Service

07/09/2019	 Motion to Strike Filed By: Defendant Flangas, Leonidas <i>Motion to Strike or Relief From Void Judgment</i>
07/09/2019	 Clerk's Notice of Hearing <i>Clerk's Notice of Hearing</i>
07/16/2019	 Notice of Rescheduling of Hearing <i>Notice of Rescheduling Hearing</i>
07/23/2019	 Opposition Filed By: Plaintiff Perfekt Marketing, LLC <i>Opposition to Defendant's Motion to Strike or Relief from Void Judgment</i>
08/15/2019	 Reply in Support Filed By: Defendant Flangas, Leonidas <i>Reply in Support Of Defendant's Motion for Relief from Void Judgment and Motion or Protective Order</i>
09/30/2019	Administrative Reassignment - Judicial Officer Change <i>From Vacant DC8 to Judge Trevor L. Atkin</i>
10/03/2019	 Stipulation and Order Filed by: Defendant Flangas, Leonidas <i>Stipulation and Order to Continue Hearing</i>
10/05/2019	 Notice of Entry of Order Filed By: Defendant Flangas, Leonidas <i>NOTICE OF ENTRY OF STIPULATION AND ORDER TO CONTINUE HEARING</i>
11/05/2019	 Notice of Appearance Party: Defendant Flangas, Leonidas <i>Notice of Appearance</i>
01/02/2020	 Supplement Filed by: Plaintiff Perfekt Marketing, LLC <i>Supplemental Brie in Support of Opposition to Defendant's Motion to Strike</i>
02/25/2020	 Supplement Filed by: Defendant Flangas, Leonidas <i>DEFENDANT FLANGAS SUPPLEMENTAL BRIEF</i>
06/04/2020	 Order Denying Motion Filed By: Plaintiff Perfekt Marketing, LLC <i>Order Denying Defendant Leonidas P. Flangas' Motion To Strike Or Relief From Void Judgment</i>
06/05/2020	 Notice of Entry of Order Filed By: Plaintiff Perfekt Marketing, LLC <i>Notice of Entry of Order Denying Defendant Leonidas P. Flangas' Motion to Strike or Relief from Void Judgment</i>

CASE SUMMARY

CASE NO. A-19-788870-F

06/20/2020



Notice of Appeal

Filed By: Defendant Flangas, Leonidas

Notice of Appeal

02/05/2019

DISPOSITIONS

Foreign Judgment (Judicial Officer: Vacant, DC 9)

Debtors: Leonidas Flangas (Defendant), Atlantis Concierge Services, LLC (Defendant), Diamond Destinations, LLC (Defendant)

Creditors: Perfekt Marketing, LLC (Plaintiff)

Judgment: 02/05/2019, Docketed: 02/06/2019

Total Judgment: 168,104.75

Satisfaction:

08/27/2019



Motion to Strike (8:30 AM) (Judicial Officer: Atkin, Trevor)

08/27/2019, 11/14/2019, 12/10/2019, 01/16/2020, 02/27/2020

Events: 07/09/2019 Motion to Strike

Defendant's Motion to Strike or Relief from Void Judgment

MINUTES

Matter Continued;

Matter Continued; Motion to Strike or Relief from Judgment

Matter Continued;

Continued;

Denied; Defendant's Motion to Strike or Relief from Void Judgment

Journal Entry Details:

Upon Court's inquiry, Defendant's supplement filed and courtesy copy provided late. Court stated the supplement would be reviewed and considered before making decision. Arguments by counsel. MATTER TAKEN UNDER ADVISEMENT. Parties to be notified by way of Minute Order or written decision. Court advised if further supplement for Plaintiff necessary, counsel will be notified, otherwise Court will make decision in chambers.;

Matter Continued;

Matter Continued; Motion to Strike or Relief from Judgment

Matter Continued;

Continued;

Denied; Defendant's Motion to Strike or Relief from Void Judgment

Journal Entry Details:

At the request of parties, COURT ORDERED, CONTINUED. CONTINUED TO: 2/13/20 9:00 a.m.;

Matter Continued;

Matter Continued; Motion to Strike or Relief from Judgment

Matter Continued;

Continued;

Denied; Defendant's Motion to Strike or Relief from Void Judgment

Journal Entry Details:

Pursuant to Stipulation of parties, COURT ORDERED, CONTINUED. CONTINUED TO: 1/16/20 9:00 a.m.;

Matter Continued;

Matter Continued; Motion to Strike or Relief from Judgment

Matter Continued;

Continued;

Denied; Defendant's Motion to Strike or Relief from Void Judgment

Journal Entry Details:

Opposing counsel not being present, Court advised this Court wants to know is the effective date when the foreign judgment is filed or when the judgment is served. Court requested Defense reach out to opposing counsel regarding next date and this Court's concerns. COURT ORDERED, CONTINUED. CONTINUED TO: 12/10/19 9:00 a.m.;

Matter Continued;

Matter Continued; Motion to Strike or Relief from Judgment

Matter Continued;

Continued;

CASE SUMMARY**CASE NO. A-19-788870-F**

Denied; Defendant's Motion to Strike or Relief from Void Judgment

Journal Entry Details:

Colloquy. COURT ORDERED, matter CONTINUED. CONTINUED TO: 09/04/19 8:30 AM;

05/06/2020

**Minute Order** (3:00 AM) (Judicial Officer: Atkin, Trevor)*Minute Order: Decision - Defendant Leonidas P. Flangas' Motion to Strike or Relief from Void Judgment*

Minute Order - No Hearing Held; Minute Order: Decision - Defendant Leonidas P. Flangas' Motion to Strike or Relief from Void Judgment

Journal Entry Details:

Defendant Leonidas P. Flangas' Motion to Strike or Relief from Void Judgment is hereby DENIED for the reasons outlined in Plaintiff's Opposition and Supplement to Opposition, particularly, that the filing date of the application of foreign judgment is the effective date of the Nevada Judgment. Further, that there is no requirement that the notice of foreign judgment be served upon judgment debtor. Plaintiff's counsel to prepare Order after affording Defendant's counsel opportunity to review. CLERK'S NOTE: The above minute order has been electronically distributed.;

DATE

FINANCIAL INFORMATION

Defendant Flangas, Leonidas

Total Charges

247.00

Total Payments and Credits

24.00

Balance Due as of 6/22/2020**223.00****Plaintiff** Perfekt Marketing, LLC

Total Charges

270.00

Total Payments and Credits

270.00

Balance Due as of 6/22/2020**0.00**

DISTRICT COURT CIVIL COVER SHEET

A-19-788870-F

County, Nevada

Case No. _____

Department 9

(Assigned by Clerk's Office)

I. Party Information (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone): Perfekt Marketing, LLC	Defendant(s) (name/address/phone): Leonidas P. Flangas; Atlantis Concierge Services, LLC; Diamond Destinations. LLC
Attorney (name/address/phone): Vernon A. Nelson, Jr., Esq. The Law Office of Vernon Nelson 9480 S. Eastern Ave., Ste. 252, Las Vegas, NV 89123 Ph. (702) 476-2500	Attorney (name/address/phone): Unknown

II. Nature of Controversy (please select the one most applicable filing type below)**Civil Case Filing Types**

Real Property Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	Negligence <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Torts Other Torts <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate Probate (select case type and estate value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate Estate Value <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	Construction Defect & Contract Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	Judicial Review/Appeal Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ Civil Writ <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ		Other Civil Filing Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input checked="" type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters

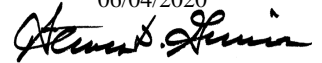
Business Court filings should be filed using the Business Court civil coversheet.

February 4, 2019

Date

Signature of initiating party or representative

See other side for family-related case filings.



CLERK OF THE COURT

ORDR

VERNON A. NELSON, JR., ESQ.

Nevada Bar No.: 6434

THE LAW OFFICE OF VERNON NELSON

6787 W. Tropicana Ave., Ste. 103

Las Vegas, NV 89103

T: 702-476-2500 | F: 702-476-2788

vnelson@nelsonlawfirmly.com

Attorneys for Perfekt Marketing LLC

DISTRICT COURT

COUNTY OF CLARK, STATE OF NEVADA

PERFEKT MARKETING L.L.C, an Arizona
limited liability company,

Plaintiff,

v.

LEONIDAS P. FLANGAS, an individual;
ATLANTIS CONCIERGE SERVICES, LLC,
a Nevada limited liability company;
DIAMOND DESTINATIONS, LLC, a
Nevada limited liability company,

Defendants.

Case No.: A-19-788870-F

Dept No.: VIII

**ORDER DENYING DEFENDANT
LEONIDAS P. FLANGAS' MOTION TO
STRIKE OR RELIEF FROM VOID
JUDGMENT**LEONIDAS P. FLANGAS, an individual;
ATLANTIS CONCIERGE SERVICES, LLC
a Nevada limited liability company;
DIAMOND DESTINATIONS, LLC a Nevada
limited liability company,

Counterclaimants,

v.

PERFEKT MARKETING, LLC, an Arizona
limited liability company; JOHN DOES 1-5 ;
XYZ CORP 1-5,

Counterdefendants.

Defendant Leonidas P. Flangas' Motion to Strike or Relief from Void Judgment having come on for hearing and the Court having reviewed the papers and pleadings filed by the respective parties, and good cause appearing therefore,

1 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Defendant Leonidas P.
2 Flangas' Motion to Strike or Relief from Void Judgment is hereby DENIED for the reasons outlined
3 in Plaintiff's Opposition and Supplement to Opposition, particularly, that the filing date of the
4 application of foreign judgment is the effective date of the Nevada Judgment. Further, that there is no
5 requirement that the notice of foreign judgment be served upon judgment debtor.

6 Dated this _____ day of May, 2020.

7 Dated this 4th day of June, 2020

8 

9 DISTRICT COURT JUDGE
10 70A 28B DC93 6EAF
11 Trevor Atkin

12 PREPARED AND SUBMITTED BY:

13 THE LAW OFFICE OF VERNON NELSON

14 By: /s/ Vernon A. Nelson, Jr., Esq.

15 VERNON A. NELSON, JR., ESQ.

16 Nevada Bar No.: 6434

17 6787 W. Tropicana Ave., Ste. 103

18 Las Vegas, NV 89103

19 T: 702-476-2500 | F: 702-476-2788

20 vnelson@nelsonlawfirmnv.com

21 Attorneys for Perfekt Marketing LLC

22 APPROVED AS TO FORM AND CONTENT:

23 By: REFUSED TO SIGN

24 Ian Christopherson, Esq.

25 Nevada Bar No.: 3701

26 600 South Third Street

27 Las Vegas, Nevada 89101

28 Email: iclaw44@gmail.com

Attorneys for Defendant, Leonidas P. Flangas

DISTRICT COURT
CLARK COUNTY, NEVADA

Perfekt Marketing, LLC,
Plaintiff(s)

vs. Leonidas Flangas,
Defendant(s)

CASE NO: a-19-788870-f

DEPT. NO. Department 8

AUTOMATED CERTIFICATE OF SERVICE

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order of Dismissal was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Envelope ID: 6140669

Service Date: 6/4/2020

Vernon Nelson

vnelson@nelsonlawfirmnv.com

Master Calendering

mail@nelsonlawfirmnv.com

Natasha Smith

natasha@flangaslawfirm.com

Leo Flangas

leo@flangaslawfirm.com

Flangas Documents

documents@flangaslawfirm.com

IAN CHRISTOPHERSON

iclaw44@gmail.com

Legal Assistant

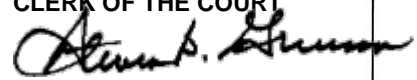
legalassistant@nelsonlawfirmnv.com

Charles ("CJ") Barnabi Jr.

cj@barnabilaw.com

Ana Brady

anab@nelsonlawfirmnv.com



1 **NEO**
2 VERNON A. NELSON, JR., ESQ.
3 Nevada Bar No.: 6434
4 THE LAW OFFICE OF VERNON NELSON
5 6787 W. Tropicana Ave., Ste. 103
6 Las Vegas, NV 89103
7 T: 702-476-2500 | F: 702-476-2788
8 vnelson@nelsonlawfirm.lv.com
9 Attorneys for Perfekt Marketing LLC

DISTRICT COURT

COUNTY OF CLARK, STATE OF NEVADA

PERFEKT MARKETING L.L.C, an Arizona
limited liability company,

Plaintiff,

v.

LEONIDAS P. FLANGAS, an individual;
ATLANTIS CONCIERGE SERVICES, LLC,
a Nevada limited liability company;
DIAMOND DESTINATIONS, LLC, a
Nevada limited liability company,

Defendants.

Case No.: A-19-788870-F
Dept No.: VIII

**NOTICE OF ENTRY OF ORDER
DENYING DEFENDANT LEONIDAS P.
FLANGAS' MOTION TO STRIKE OR
RELIEF FROM VOID JUDGMENT**

LEONIDAS P. FLANGAS, an individual;
ATLANTIS CONCIERGE SERVICES, LLC
a Nevada limited liability company;
DIAMOND DESTINATIONS, LLC a Nevada
limited liability company,

Counterclaimants,

v.

PERFEKT MARKETING, LLC, an Arizona
limited liability company; JOHN DOES 1-5 ;
XYZ CORP 1-5,

Counterdefendants.

PLEASE TAKE NOTICE that on the 4th day of June, 2020, an Order was entered on the

...

...

...

1 Court's docket. A copy of said Order is attached hereto.

2 Dated this 5th day of June, 2020.

3 THE LAW OFFICE OF VERNON NELSON

4 By: /s/ Vernon A. Nelson

5 VERNON A. NELSON, JR., ESQ.

6 Nevada Bar No.: 6434

7 6787 W. Tropicana Ave., Ste. 103

8 Las Vegas, NV 89103

9 Tel: 702-476-2500

10 Fax: 702-476-2788

11 E-Mail: vnelson@nelsonlawfirmnv.com

12 *Attorney for Plaintiff*

CERTIFICATE OF SERVICE
Case No.: A-19-788870-F, Dept. 8

I am over the age of eighteen (18) years and not a party to the within entitled action. I am employed by The Law Office of Vernon Nelson, PLLC, 6787 W. Tropicana Avenue, Ste. 103, Las Vegas, Nevada 89103. I am readily familiar with The Law Office of Vernon Nelson, PLLC's practice for collection and processing of documents for delivery by way of the service indicated below.

On June 5, 2020, I served the following document(s):

**NOTICE OF ENTRY OF ORDER DENYING DEFENDANT LEONIDAS P. FLANGAS'
MOTION TO STRIKE OR RELIEF FROM VOID JUDGMENT**

on the interested party(ies) in this action as follows:

☐ **By Mail.** By placing said document(s) in an envelope or package for collection and mailing, addressed to the person(s) at the address(es) listed above, following our ordinary business practices. I am readily familiar with the firm's practice for collection and processing of mail. Under that practice, on the same day that mail is placed for collection and mailing, it is deposited in the ordinary course of business with the U.S. Postal Service, in a sealed envelope or package with the postage fully prepaid.

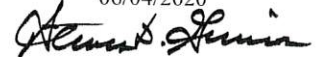
☐ **By Facsimile Transmission.** Based on an agreement of the parties to accept service by facsimile transmission or by Court order; or as a courtesy copy, I caused said document(s) to be transmitted to the person(s) at the facsimile number(s) listed above. The facsimile transmission was reported as complete and a copy of the transmission report will be maintained with the document(s) in this office.

☒ **By Electronic Service.** Pursuant to Administrative Order 14-2 and Rule 9 of the NEFCR I caused said documents(s) to be transmitted to the person(s) identified in the E-Service List for this captioned case in Odyssey E-File & Serve of the Eighth Judicial District Court, County of Clark, State of Nevada. A service transmission report reported service as complete and a copy of the service transmission report will be maintained with the document(s) in this office.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

/s/ Ana Brady

An Employee of The Law Office of Vernon
Nelson



CLERK OF THE COURT

1 ORDER

2 VERNON A. NELSON, JR., ESQ.
 3 Nevada Bar No.: 6434
 4 THE LAW OFFICE OF VERNON NELSON
 5 6787 W. Tropicana Ave., Ste. 103
 Las Vegas, NV 89103
 6 T: 702-476-2500 | F: 702-476-2788
 7 vnelson@nelsonlawfirm.lv.com
 8 Attorneys for Perfekt Marketing LLC

DISTRICT COURT**COUNTY OF CLARK, STATE OF NEVADA**

9 PERFEKT MARKETING L.L.C, an Arizona
 10 limited liability company,

11 Plaintiff,

12 v.

13 LEONIDAS P. FLANGAS, an individual;
 14 ATLANTIS CONCIERGE SERVICES, LLC,
 a Nevada limited liability company;
 15 DIAMOND DESTINATIONS, LLC, a
 Nevada limited liability company,

16 Defendants.

Case No.: A-19-788870-F
 Dept No.: VIII

**ORDER DENYING DEFENDANT
 LEONIDAS P. FLANGAS' MOTION TO
 STRIKE OR RELIEF FROM VOID
 JUDGMENT**

17 LEONIDAS P. FLANGAS, an individual;
 18 ATLANTIS CONCIERGE SERVICES, LLC
 a Nevada limited liability company;
 19 DIAMOND DESTINATIONS, LLC a Nevada
 limited liability company,

20 Counterclaimants,

21 v.

22 PERFEKT MARKETING, LLC, an Arizona
 limited liability company; JOHN DOES 1-5 ;
 23 XYZ CORP 1-5,

24 Counterdefendants.

25 Defendant Leonidas P. Flangas' Motion to Strike or Relief from Void Judgment having come
 26 on for hearing and the Court having reviewed the papers and pleadings filed by the respective parties,
 27 and good cause appearing therefore,
 28

1 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Defendant Leonidas P.
2 Flangas' Motion to Strike or Relief from Void Judgment is hereby DENIED for the reasons outlined
3 in Plaintiff's Opposition and Supplement to Opposition, particularly, that the filing date of the
4 application of foreign judgment is the effective date of the Nevada Judgment. Further, that there is no
5 requirement that the notice of foreign judgment be served upon judgment debtor.

6 Dated this _____ day of May, 2020.

7 Dated this 4th day of June, 2020

8 

9 DISTRICT COURT JUDGE
10 70A 28B DC93 6EAF
11 Trevor Atkin

12 PREPARED AND SUBMITTED BY:

13 THE LAW OFFICE OF VERNON NELSON

14 By: /s/ Vernon A. Nelson, Jr., Esq.

15 VERNON A. NELSON, JR., ESQ.

16 Nevada Bar No.: 6434

17 6787 W. Tropicana Ave., Ste. 103

18 Las Vegas, NV 89103

19 T: 702-476-2500 | F: 702-476-2788

20 vnelson@nelsonlawfirm.lv.com

21 Attorneys for Perfekt Marketing LLC

22 APPROVED AS TO FORM AND CONTENT:

23 By: REFUSED TO SIGN

24 Ian Christopherson, Esq.

25 Nevada Bar No.: 3701

26 600 South Third Street

27 Las Vegas, Nevada 89101

28 Email: iclaw44@gmail.com

Attorneys for Defendant, Leonidas P. Flangas

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Foreign Judgment

COURT MINUTES

August 27, 2019

A-19-788870-F Perfekt Marketing, LLC, Plaintiff(s)
vs. Leonidas Flangas, Defendant(s)

August 27, 2019 8:30 AM Motion to Strike

HEARD BY: Bonaventure, Joseph T. **COURTROOM:** Phoenix Building 11th Floor
110

COURT CLERK: Nylasia Packer

RECORDER: Gail Reiger

REPORTER:

PARTIES

PRESENT: Christopherson, Ian Attorney

JOURNAL ENTRIES

- Colloquy. COURT ORDERED, matter CONTINUED.

CONTINUED TO: 09/04/19 8:30 AM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Foreign Judgment

COURT MINUTES

November 14, 2019

A-19-788870-F Perfekt Marketing, LLC, Plaintiff(s)
vs. Leonidas Flangas, Defendant(s)

**November 14, 2019 9:00 AM Motion to Strike Motion to Strike or
Relief from Judgment**

HEARD BY: Atkin, Trevor **COURTROOM:** Phoenix Building 11th Floor
110

COURT CLERK: Alan Castle

RECORDER: Jessica Kirkpatrick

REPORTER:

PARTIES

PRESENT: Christopherson, Ian Attorney
Flangas, Leonidas Defendant

JOURNAL ENTRIES

- Opposing counsel not being present, Court advised this Court wants to know is the effective date when the foreign judgment is filed or when the judgment is served. Court requested Defense reach out to opposing counsel regarding next date and this Court's concerns. COURT ORDERED, CONTINUED.

CONTINUED TO:
12/10/19 9:00 a.m.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Foreign Judgment

COURT MINUTES

December 10, 2019

A-19-788870-F Perfekt Marketing, LLC, Plaintiff(s)
vs. Leonidas Flangas, Defendant(s)

December 10, 2019 9:00 AM Motion to Strike

HEARD BY: Atkin, Trevor **COURTROOM:** Phoenix Building 11th Floor
110

COURT CLERK: Alan Castle

RECORDER: Jessica Kirkpatrick

REPORTER:

PARTIES

PRESENT: Christopherson, Ian Attorney

JOURNAL ENTRIES

- Pursuant to Stipulation of parties, COURT ORDERED, CONTINUED.

CONTINUED TO:
1/16/20 9:00 a.m.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Foreign Judgment

COURT MINUTES

January 16, 2020

A-19-788870-F Perfekt Marketing, LLC, Plaintiff(s)
vs. Leonidas Flangas, Defendant(s)

January 16, 2020 9:00 AM Motion to Strike

HEARD BY: Atkin, Trevor **COURTROOM:** Phoenix Building 11th Floor
110

COURT CLERK: Alan Castle

RECORDER: Jessica Kirkpatrick

REPORTER:

PARTIES

PRESENT: Christopherson, Ian Attorney

JOURNAL ENTRIES

- At the request of parties, COURT ORDERED, CONTINUED.

CONTINUED TO:
2/13/20 9:00 a.m.

**DISTRICT COURT
CLARK COUNTY, NEVADA****Foreign Judgment****COURT MINUTES****February 27, 2020**

A-19-788870-F Perfekt Marketing, LLC, Plaintiff(s)
vs. Leonidas Flangas, Defendant(s)

**February 27, 2020 9:00 AM Motion to Strike Defendant's Motion
to Strike or Relief
from Void Judgment**

HEARD BY: Atkin, Trevor

COURTROOM: Phoenix Building 11th Floor
110

COURT CLERK: Alan Castle

RECORDER: Jessica Kirkpatrick

REPORTER:

PARTIES

PRESENT: Christopherson, Ian Attorney
Nelson, Vernon A. Attorney

JOURNAL ENTRIES

- Upon Court's inquiry, Defendant's supplement filed and courtesy copy provided late. Court stated the supplement would be reviewed and considered before making decision. Arguments by counsel. MATTER TAKEN UNDER ADVISEMENT. Parties to be notified by way of Minute Order or written decision. Court advised if further supplement for Plaintiff necessary, counsel will be notified, otherwise Court will make decision in chambers.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Foreign Judgment**COURT MINUTES****May 06, 2020**

A-19-788870-F

Perfekt Marketing, LLC, Plaintiff(s)
vs. Leonidas Flangas, Defendant(s)

May 06, 2020**3:00 AM****Minute Order**

**Minute Order:
Decision - Defendant
Leonidas P. Flangas'
Motion to Strike or
Relief from Void
Judgment**

HEARD BY: Atkin, Trevor**COURTROOM:** Chambers**COURT CLERK:** Alan Castle**RECORDER:****REPORTER:**

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- Defendant Leonidas P. Flangas' Motion to Strike or Relief from Void Judgment is hereby DENIED for the reasons outlined in Plaintiff's Opposition and Supplement to Opposition, particularly, that the filing date of the application of foreign judgment is the effective date of the Nevada Judgment. Further, that there is no requirement that the notice of foreign judgment be served upon judgment debtor.

Plaintiff's counsel to prepare Order after affording Defendant's counsel opportunity to review.

CLERK'S NOTE: The above minute order has been electronically distributed.



EIGHTH JUDICIAL DISTRICT COURT CLERK'S OFFICE
NOTICE OF DEFICIENCY
ON APPEAL TO NEVADA SUPREME COURT

IAN CHRISTOPHER, ESQ.
600 S. THIRD ST.
LAS VEGAS, NV 89101

DATE: June 22, 2020
CASE: A-19-788870-F

RE CASE: PERFECT MARKETING, LLC vs. LEONIDAS P. FLANGAS; ATLANTIS CONCIERGE SERVICES, LLC; DIAMOND DESTINATIONS, LLC

NOTICE OF APPEAL FILED: June 20, 2020

YOUR APPEAL HAS BEEN SENT TO THE SUPREME COURT.

PLEASE NOTE: DOCUMENTS **NOT** TRANSMITTED HAVE BEEN MARKED:

- ☒ \$250 – Supreme Court Filing Fee (Make Check Payable to the Supreme Court)**
 - If the \$250 Supreme Court Filing Fee was not submitted along with the original Notice of Appeal, it must be mailed directly to the Supreme Court. The Supreme Court Filing Fee will not be forwarded by this office if submitted after the Notice of Appeal has been filed.
- ☐ \$24 – District Court Filing Fee (Make Check Payable to the District Court)**
- ☒ \$500 – Cost Bond on Appeal (Make Check Payable to the District Court)**
 - NRAP 7: Bond For Costs On Appeal in Civil Cases
- ☒ Case Appeal Statement
 - NRAP 3 (a)(1), Form 2
- ☐ Order
- ☐ Notice of Entry of Order

NEVADA RULES OF APPELLATE PROCEDURE 3 (a) (3) states:

"The district court clerk must file appellant's notice of appeal despite perceived deficiencies in the notice, including the failure to pay the district court or Supreme Court filing fee. **The district court clerk shall apprise appellant of the deficiencies in writing**, and shall transmit the notice of appeal to the Supreme Court in accordance with subdivision (g) of this Rule with a notation to the clerk of the Supreme Court setting forth the deficiencies. Despite any deficiencies in the notice of appeal, the clerk of the Supreme Court shall docket the appeal in accordance with Rule 12."

Please refer to Rule 3 for an explanation of any possible deficiencies.

***Per District Court Administrative Order 2012-01, in regards to civil litigants, "...all Orders to Appear in Forma Pauperis expire one year from the date of issuance." You must reapply for in Forma Pauperis status.*

Certification of Copy

State of Nevada }
County of Clark } SS:

I, Steven D. Grierson, the Clerk of the Court of the Eighth Judicial District Court, Clark County, State of Nevada, does hereby certify that the foregoing is a true, full and correct copy of the hereinafter stated original document(s):

NOTICE OF APPEAL; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET; ORDER DENYING DEFENDANT LEONIDAS P. FLANGAS' MOTION TO STRIKE OR RELIEF FROM VOID JUDGMENT; NOTICE OF ENTRY OF ORDER DENYING DEFENDANT LEONIDAS P. FLANGAS' MOTION TO STRIKE OR RELIEF FROM VOID JUDGMENT; DISTRICT COURT MINUTES; NOTICE OF DEFICIENCY

PERFEKT MARKETING, LLC ,

Plaintiff(s),

vs.

LEONIDAS P. FLANGAS; ATLANTIS
CONCIERGE SERVICES, LLC; DIAMOND
DESTINATIONS, LLC,

Defendant(s),

Case No: A-19-788870-F

Dept No: VIII

now on file and of record in this office.

IN WITNESS THEREOF, I have hereunto
Set my hand and Affixed the seal of the
Court at my office, Las Vegas, Nevada
This 22 day of June 2020.

Steven D. Grierson, Clerk of the Court



Amanda Hampton, Deputy Clerk