

Electronically Filed
Sep 30 2020 11:19 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

1 **NOAS**
2 **STORM LEGAL GROUP**
3 ERICH N. STORM, ESQ.
4 Nevada State Bar No.:4480
5 estorm@keyinsco.com
6 3057 East Warm Springs Road, Suite 400
7 Las Vegas, Nevada 89120
8 Telephone: (702) 765-0976
9 Facsimile: (702) 765-0981
10 *Attorneys for Defendant*

11 **DISTRICT COURT**
12 **CLARK COUNTY, NEVADA**

13 PATRICIA SANCHEZ, an individual,

14 Plaintiff,

15 vs.

16 JUAN MILLAN ARCE, an Individual; DOES I-
17 X, inclusive; and ROE CORORATIONS I-X,
18 inclusive,

19 Defendants.

CASE NO.: A-19-796822-C

DEPT NO.: 27

NOTICE OF APPEAL

20 Notice is hereby given that JUAN MILLAN ARCE, defendant above-named, hereby
21 appeals to the Supreme Court of Nevada from:

- 22 1. The Order entered in this action on the 15th day of September, 2020,
23 granting Plaintiff's MOTION FOR RELIEF FROM JUDGMENT

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1 AND TO ENFORCE SETTLEMENT.

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3 DATED this 28th day of September, 2020

4 **STORM LEGAL GROUP**

5
6 By: 

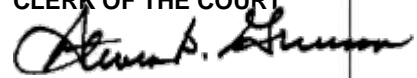
7 ERICH N. STORM, ESQ.
8 Nevada State Bar No.:4480
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10 Las Vegas, Nevada 89120
11 Telephone: (702) 765-0976
12 *Attorney for Defendant*

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STORM LEGAL GROUP



1 **ASTA**
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10 *Attorneys for Defendant*

11 **DISTRICT COURT**
12 **CLARK COUNTY, NEVADA**

13 PATRICIA SANCHEZ, an individual,

14 Plaintiff,

15 vs.

16 JUAN MILLAN ARCE, an Individual; DOES I-
17 X, inclusive; and ROE CORORATIONS I-X,
18 inclusive,

19 Defendants.

CASE NO.: A-19-796822-C

DEPT NO.: 27

CASE APPEAL STATEMENT

20 Defendant/appellant JUAN MILLAN ARCE, through his undersigned counsel, hereby
21 submits the following Case Appeal Statement:

22 **1. Name of appellant filing this case appeal statement:**

23 Juan Millan Arce.

24 **2. Identify the judge issuing the decision, judgment, or order appealed from:**

25 The honorable Nancy L. Allf.

26 **3. Identify each appellant and the name and address of counsel for each appellant:**

27 Appellant: Juan Millan Arce.

28 Counsel for Appellant: ERICH N. STORM, ESQ., 3057 East Warm Springs Road,
Suite 400, Las Vegas, Nevada 89120.

1 **4. Identify each respondent and the name and address of appellate counsel, if**
2 **known, for each respondent (if the name of a respondent's appellate counsel is**
3 **unknown, indicate as much and provide the name and address of that respondent's**
4 **trial counsel):**

5 Respondent: Patricia Sanchez.

6 Counsel for Respondent: Nathan S. Deaver, Esq., and Brice J. Crafton, Esq., 810
7 E. Charleston Blvd. Las Vegas, Nevada 89104.

8 **5. Indicate whether any attorney identified above in response to question 3 or 4 is**
9 **not licensed to practice law in Nevada and, if so, whether the district court granted**
10 **that attorney permission to appear under SCR 42 (attach a copy of any district court**
11 **order granting such permission):**

12 No attorney is not license to practice law in Nevada.

13 **6. Indicate whether appellant was represented by appointed or retained counsel in**
14 **the district court:**

15 Appellant was represented by retained counsel in the district court

16 **7. Indicate whether appellant is represented by appointed or retained counsel on**
17 **appeal:**

18 Appellant is represented by retained counsel on appeal.

19 **8. Indicate whether appellant was granted leave to proceed in forma pauperis, and**
20 **the date of entry of the district court order granting such leave:**

21 Appellant has not been granted leave to proceed in forma pauperis.

22 **9. Indicate the date the proceedings commenced in the district court (e.g., date**
23 **complaint, indictment, information, or petition was filed):**

24 June 17, 2019.

25 **10. Provide a brief description of the nature of the action and result in the district**
26 **court, including the type of judgment or order being appealed and the relief granted**
27 **by the district court:**

28 This is a personal injury action between Plaintiff/Respondent and
 Defendant/Appellant. Defendant/Appellant was insured under an automobile

1 liability policy and his insurer provided a defense. The parties submitted the matter
2 to the court-annexed arbitration program in Clark County, Nevada, and an award
3 was rendered in favor of Defendant/Appellant and against Plaintiff/Respondent.
4 Subsequently, counsel for Plaintiff/Respondent contacted the claims representative
5 for Defendant's/Appellant's automobile liability insurer without the knowledge or
6 consent of counsel for Defendant/Appellant and settled the matter.
7 Defendant/Appellant denied that the parties entered into an enforceable settlement
8 agreement and obtained entry of judgment in his favor and against
9 Plaintiff/Respondent pursuant to NAR 19(A). Plaintiff/Respondent subsequently
10 filed a MOTION FOR RELIEF FROM JUDGMENT AND TO ENFORCE
11 SETTLEMENT. The district court granted said Motion.

12 Defendant/Appellant appeals from the district court's Order granting
13 Plaintiff's/Respondent's MOTION FOR RELIEF FROM JUDGMENT AND TO
14 ENFORCE SETTLEMENT.

15 **11. Indicate whether the case has previously been the subject of an appeal to or**
16 **original writ proceeding in the Supreme Court and, if so, the caption and Supreme**
17 **Court docket number of the prior proceeding:**

18 The case has not previously been the subject of an appeal or original writ
19 proceeding in the Supreme Court.

20 **12. Indicate whether this appeal involves child custody or visitation:**

21 The appeal does not involve child custody or visitation.

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☐ by placing a true and correct copy of the same to be deposited for mailing in the U.S. Mail, enclosed in a sealed envelope upon which first class postage was fully prepaid; and /or

☐ via facsimile; and or

☐ by hand delivery to parties listed below; and or

☒ by electronic service via ODYSSEY through the District Court.

Attorneys for Plaintiff

STORM LEGAL GROUP

EIGHTH JUDICIAL DISTRICT COURT

CASE SUMMARY**CASE NO. A-19-796822-C**

Patricia Sanchez, Plaintiff(s)
vs.
Juan Arce, Defendant(s)

§
 §
 §
 §
 §

Location: **Department 27**
 Judicial Officer: **Allf, Nancy**
 Filed on: **06/17/2019**
 Cross-Reference Case Number: **A796822**

CASE INFORMATION**Statistical Closures**

09/15/2020 Other Manner of Disposition
 03/25/2020 Judgment on Arbitration

Case Type: **Negligence - Auto**

Case
 Status: **09/15/2020 Closed**

DATE**CASE ASSIGNMENT****Current Case Assignment**

Case Number A-19-796822-C
 Court Department 27
 Date Assigned 06/17/2019
 Judicial Officer Allf, Nancy

PARTY INFORMATION

Plaintiff **Sanchez, Patricia**

Lead Attorneys

Deaver, Nathan
Retained
 702-385-5969(W)

Defendant **Arce, Juan Millan**

Anderson, Mark R.
Retained
 702-765-0976(W)

DATE**EVENTS & ORDERS OF THE COURT****INDEX****EVENTS**

06/17/2019

**Complaint**

Filed By: Plaintiff Sanchez, Patricia
Complaint

06/17/2019

**Initial Appearance Fee Disclosure**

Filed By: Plaintiff Sanchez, Patricia
Initial Appearance Fee Disclosure

06/17/2019

**Summons Electronically Issued - Service Pending***Summons*

06/17/2019

**Summons Electronically Issued - Service Pending***Summons*

07/01/2019

**Affidavit of Service**

Filed By: Plaintiff Sanchez, Patricia
Affidavit of Service

07/03/2019

**Initial Appearance Fee Disclosure**

Filed By: Defendant Arce, Juan Millan
Initial Appearance Fee Disclosure







CASE SUMMARY

CASE NO. A-19-796822-C

07/03/2019	 Demand for Jury Trial Filed By: Defendant Arce, Juan Millan <i>Demand for Trial by Jury</i>
07/03/2019	 Answer to Complaint Filed by: Defendant Arce, Juan Millan <i>Defendant's Answer to Plaintiff's Complaint</i>
08/09/2019	 Appointment of Arbitrator <i>Appointment of Arbitrator</i>
08/16/2019	 Notice of Early Arbitration Conference <i>Notice of Early Arbitration Conference</i>
08/29/2019	 Arbitration Discovery Order <i>Arbitration Discovery Order</i>
08/29/2019	 Notice to Appear for Arbitration Hearing <i>Notice to Appear for Arbitration Hearing</i>
02/03/2020	 Notice <i>Notice of Change of Address</i>
02/03/2020	 Notice to Appear for Arbitration Hearing <i>Amended Notice to Appear for Arbitration Hearing</i>
02/11/2020	 Arbitration Award Filed By: Arbitrator Rasmussen, R. Scott <i>Arbitration Award</i>
02/11/2020	 Arbitrators Bill for Fees and Costs <i>Arbitrators Bill for Fees and Costs</i>
03/18/2020	 Notice To Prevailing Party Final Judgment May Be Entered <i>Notice to Prevailing Party that Final Judgment may now be Entered on Arbitration Award</i>
03/25/2020	 Judgment on Arbitration Award Filed By: Defendant Arce, Juan Millan <i>Judgment on Arbitration Award</i>
03/27/2020	 Motion for Relief Filed By: Plaintiff Sanchez, Patricia <i>Plaintiff's Motion for Relief from Judgment and to Enforce Settlement</i>
03/30/2020	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
04/06/2020	 Opposition to Motion Filed By: Defendant Arce, Juan Millan <i>Defendant's Opposition to Plaintiff's Motion for Relief from Judgment and to Enforce Settlement</i>

CASE SUMMARY


CASE NO. A-19-796822-C

04/22/2020	 Reply to Opposition Filed by: Plaintiff Sanchez, Patricia <i>Plaintiff's Reply to Defendant's Opposition to Motion for Relief from Judgment and to Enforce Settlement</i>
08/12/2020	 Recorders Transcript of Hearing <i>Transcript of Proceedings, Motions Hearing, Heard on June 11, 2020</i>
09/15/2020	 Order Granting Motion <i>Order re Granting Motion to Enforce Settlement</i>
09/17/2020	 Notice of Entry of Order Filed By: Plaintiff Sanchez, Patricia <i>Notice of Entry of Order</i>
09/28/2020	 Notice of Appeal Filed By: Defendant Arce, Juan Millan <i>Notice of Appeal</i>
09/28/2020	 Case Appeal Statement Filed By: Defendant Arce, Juan Millan <i>Case Appeal Statement</i>

DISPOSITIONS

02/11/2020	Arbitration Award (Judicial Officer: Allf, Nancy) Debtors: Patricia Sanchez (Plaintiff) Creditors: Juan Millan Arce (Defendant) Judgment: 02/11/2020, Docketed: 03/26/2020
03/25/2020	Judgment Upon Arbitration Award (Judicial Officer: Allf, Nancy) Debtors: Patricia Sanchez (Plaintiff) Creditors: Juan Millan Arce (Defendant) Judgment: 03/25/2020, Docketed: 03/26/2020
03/25/2020	Judgment of Dismissal With Prejudice (Judicial Officer: Allf, Nancy) Debtors: R. Scott Rasmussen (Arbitrator), Patricia Sanchez (Plaintiff) Creditors: Juan Millan Arce (Defendant) Judgment: 03/25/2020, Docketed: 03/26/2020
09/15/2020	Order (Judicial Officer: Allf, Nancy) Debtors: Juan Millan Arce (Defendant) Creditors: Patricia Sanchez (Plaintiff) Judgment: 09/15/2020, Docketed: 09/17/2020 Total Judgment: 10,000.00



HEARINGS

02/07/2020	Arbitration Hearing (7:00 AM)
04/24/2020	 Minute Order (3:00 AM) (Judicial Officer: Allf, Nancy) <i>Minute Order: Plaintiff's Motion for Relief from Judgment and to Enforce Settlement set 4/29/2020 CONTINUED to 6/10/2020</i> Minute Order - No Hearing Held; Minute Order: Plaintiff's Motion for Relief from Judgment and to Enforce Settlement set 4/29/2020 CONTINUED to 6/10/2020 Journal Entry Details: <i>COURT FINDS after review that on March 27, 2020, Plaintiff's Motion for Relief from</i>

EIGHTH JUDICIAL DISTRICT COURT

CASE SUMMARY

CASE NO. A-19-796822-C

	<p><i>Judgment and to Enforce Settlement (the Motion) was filed. The Motion was set for April 29, 2020 at 9:00 a.m. on Motions Calendar. COURT FURTHER FINDS after review pursuant to Administrative Order 20-01 in response to COVID-19 concerns, all currently scheduled non-essential District Court hearings are ordered to be conducted by video or telephone means, decided on the papers, or rescheduled unless otherwise directed by a District Court Judge. Moreover, Administrative Order 20-13 provides that AO 20-01 will remain in effect and all deadlines provided therein will be extended unless modified or rescinded by a subsequent order. THEREFORE, COURT ORDERS for good cause appearing and after review pursuant to Administrative Orders 20-01 and 20-13, the Motion set for hearing on April 29, 2020 is hereby CONTINUED to June 10, 2020 at 9:00 a.m. CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Nicole McDevitt, to all registered parties for Odyssey File & Serve. /nm 4/24/2020;</i></p>
06/04/2020	<p> Minute Order (3:00 AM) (Judicial Officer: Allf, Nancy)</p> <p><i>Minute Order: Plaintiff's Motion for Relief from Judgment and to Enforce Settlement set 6/10/2020 CONTINUED to 6/11/2020</i></p> <p>Minute Order - No Hearing Held;</p> <p>Journal Entry Details:</p> <p><i>COURT FINDS after review the Plaintiff's Motion for Relief from Judgment and to Enforce Settlement filed March 27, 2020 was set for Motions Calendar on June 10, 2020. COURT FURTHER FINDS after review pursuant to Administrative Order 20-01 in response to COVID-19 concerns, all currently scheduled non-essential District Court hearings are ordered to be conducted by video or telephone means, decided on the papers, or rescheduled unless otherwise directed by a District Court Judge. Moreover, Administrative Order 20-13 provides that AO 20-01 will remain in effect and all deadlines provided therein will be extended unless modified or rescinded by a subsequent order. THEREFORE, COURT ORDERS for good cause appearing and after review pursuant to Administrative Orders 20-01 and 20-13, the matter set for hearing on June 10, 2020 is hereby CONTINUED to June 11, 2020 at 3:30 p.m. The parties shall appear remotely through BlueJeans. CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Nicole McDevitt, to all registered parties for Odyssey File & Serve. /nm 6/4/2020;</i></p>
06/11/2020	<p> Motion for Relief (3:30 PM) (Judicial Officer: Allf, Nancy)</p> <p><i>Plaintiff's Motion for Relief from Judgment and to Enforce Settlement</i></p> <p>Granted;</p> <p>Journal Entry Details:</p> <p><i>Court noted procedures in place as to hearing and trials due to the COVID-19 pandemic. Arguments by counsel regarding the merits of and opposition to the motion. Court stated its findings and ORDERED, Plaintiff's Motion for Relief from Judgment and to Enforce Settlement GRANTED. Mr. Crafton to prepare the order, including findings of fact and conclusions of law, and submit it to opposing counsel for approval prior to e-mail submission to the court.;</i></p>

DATE

FINANCIAL INFORMATION

Defendant Arce, Juan Millan	
Total Charges	254.00
Total Payments and Credits	254.00
Balance Due as of 9/29/2020	0.00
Plaintiff Sanchez, Patricia	
Total Charges	270.00
Total Payments and Credits	270.00
Balance Due as of 9/29/2020	0.00
Defendant Arce, Juan Millan	
Appeal Bond Balance as of 9/29/2020	500.00

DISTRICT COURT CIVIL COVER SHEET

Clark

County, Nevada

Case No. _____

(Assigned by Clerk's Office)

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

Plaintiff(s) (name/address/phone):

Patricia Sanchez

Defendant(s) (name/address/phone):

Juan Miller Arce

CASE NO: A-19-796822-C
Department 27

Attorney (name/address/phone):

Deaver | Crafton, Attorneys at Law

810 E. Charleston Blvd., Las Vegas, NV 89104

P. (702)385-5969 admin@deavercrafton.com

Attorney (name/address/phone):

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

Civil Case Filing Types

<p style="text-align: center;">Real Property</p> <p>Landlord/Tenant</p> <p><input type="checkbox"/> Unlawful Detainer</p> <p><input type="checkbox"/> Other Landlord/Tenant</p> <p>Title to Property</p> <p><input type="checkbox"/> Judicial Foreclosure</p> <p><input type="checkbox"/> Other Title to Property</p> <p>Other Real Property</p> <p><input type="checkbox"/> Condemnation/Eminent Domain</p> <p><input type="checkbox"/> Other Real Property</p>	<p style="text-align: center;">Negligence</p> <p><input checked="" type="checkbox"/> Auto</p> <p><input type="checkbox"/> Premises Liability</p> <p><input type="checkbox"/> Other Negligence</p> <p>Malpractice</p> <p><input type="checkbox"/> Medical/Dental</p> <p><input type="checkbox"/> Legal</p> <p><input type="checkbox"/> Accounting</p> <p><input type="checkbox"/> Other Malpractice</p>	<p style="text-align: center;">Torts</p> <p>Other Torts</p> <p><input type="checkbox"/> Product Liability</p> <p><input type="checkbox"/> Intentional Misconduct</p> <p><input type="checkbox"/> Employment Tort</p> <p><input type="checkbox"/> Insurance Tort</p> <p><input type="checkbox"/> Other Tort</p>
<p style="text-align: center;">Probate</p> <p>Probate <i>(select case type and estate value)</i></p> <p><input type="checkbox"/> Summary Administration</p> <p><input type="checkbox"/> General Administration</p> <p><input type="checkbox"/> Special Administration</p> <p><input type="checkbox"/> Set Aside <input type="checkbox"/> Surviving Spouse</p> <p><input type="checkbox"/> Trust/Conservatorship</p> <p><input type="checkbox"/> Other Probate</p> <p>Estate Value</p> <p><input type="checkbox"/> Greater than \$300,000</p> <p><input type="checkbox"/> \$200,000-\$300,000</p> <p><input type="checkbox"/> \$100,001-\$199,999</p> <p><input type="checkbox"/> \$25,001-\$100,000</p> <p><input type="checkbox"/> \$20,001-\$25,000</p> <p><input type="checkbox"/> \$2,501-20,000</p> <p><input type="checkbox"/> \$2,500 or less</p>	<p style="text-align: center;">Construction Defect & Contract</p> <p>Construction Defect</p> <p><input type="checkbox"/> Chapter 40</p> <p><input type="checkbox"/> Other Construction Defect</p> <p>Contract Case</p> <p><input type="checkbox"/> Uniform Commercial Code</p> <p><input type="checkbox"/> Building and Construction</p> <p><input type="checkbox"/> Insurance Carrier</p> <p><input type="checkbox"/> Commercial Instrument</p> <p><input type="checkbox"/> Collection of Accounts</p> <p><input type="checkbox"/> Employment Contract</p> <p><input type="checkbox"/> Other Contract</p>	<p style="text-align: center;">Judicial Review/Appeal</p> <p>Judicial Review</p> <p><input type="checkbox"/> Foreclosure Mediation Case</p> <p><input type="checkbox"/> Petition to Seal Records</p> <p><input type="checkbox"/> Mental Competency</p> <p>Nevada State Agency Appeal</p> <p><input type="checkbox"/> Department of Motor Vehicle</p> <p><input type="checkbox"/> Worker's Compensation</p> <p><input type="checkbox"/> Other Nevada State Agency</p> <p>Appeal Other</p> <p><input type="checkbox"/> Appeal from Lower Court</p> <p><input type="checkbox"/> Other Judicial Review/Appeal</p>
<p style="text-align: center;">Civil Writ</p> <p>Civil Writ</p> <p><input type="checkbox"/> Writ of Habeas Corpus</p> <p><input type="checkbox"/> Writ of Mandamus</p> <p><input type="checkbox"/> Writ of Quo Warrant</p>	<p style="text-align: center;">Other Civil Filing</p> <p>Other Civil Filing</p> <p><input type="checkbox"/> Compromise of Minor's Claim</p> <p><input type="checkbox"/> Foreign Judgement</p> <p><input type="checkbox"/> Other Civil Matters</p>	

Business Court filings should be filed using the Business Court civil cover sheet.

June 17, 2019

Date

Signature of initiating party or representative

See other side for family-related case filings.

Shannon S. Lumin
CLERK OF THE COURT

ORDR

NATHAN S. DEEVER, ESQ.

Nevada Bar No. 11947

BRICE J. CRAFTON, ESQ.

Nevada Bar No. 10558

DEEVER | CRAFTON

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Las Vegas, NV 89104

brice@deevercrafton.com

shannon@deevercrafton.com

Tel. (702)385-5969

Fax. (702)385-6939

Attorneys for Plaintiff

DISTRICT COURT

COUNTY OF CLARK, NEVADA

PATRICIA SANCHEZ, an individual;

Plaintiff,

Case No. A- 19-796822-C

vs.

Dept. No. XXVII

JUAN MILLAN ARCE, an individual; DOES
I-X, inclusive; and ROE CORPORATIONS I-
X, inclusive;

Defendants.

**ORDER GRANTING PLAINTIFF'S MOTION FOR RELIEF FROM
JUDGMENT AND TO ENFORCE SETTLEMENT**

The Motion for Relief from Judgment and to Enforce Settlement, having come before the Court on June 11, 2020 at 3:30pm, and the Court, having reviewed the papers submitted by the parties and heard the arguments of counsel, finds, concludes, and orders the Motion **GRANTED**, as set forth below, which is based upon Plaintiff's factual summary as outlined in Plaintiff's moving papers, which the court adopts, and the moving papers, including the citations to legal authorities, which the court finds persuasive:

1 **THE COURT FINDS** that Defendant was an insured of Key Insurance Company, Inc., at all
2 relevant times, and provided a defense to Defendant with respect to this matter. Erika Cervantes
3 was an employee of Key Insurance Company, Inc. and was the claims adjuster assigned to this
4 matter.

5 **THE COURT FURTHER FINDS** that a settlement was reached in this matter on February 20,
6 2020 during a telephone conversation between Plaintiff's counsel, Mr. Nathan Deaver and Erika
7 Cervantes. During that conversation, Ms. Cervantes agreed to pay the sum of \$10,000.00 and
8 was to send Mr. Deaver a release regarding the same. This settlement was reached specifically
9 to avoid the need for Plaintiff to file a request for short trial after an arbitration award was
10 submitted on February 11, 2020.

11 **THE COURT FURTHER FINDS** that pursuant to the settlement discussions had, and
12 agreements reached, between Mr. Deaver and Ms. Cervantes on February 20, 2020, a valid,
13 binding, and enforceable contract for settlement was entered, which included: an offer to settle
14 for \$10,000.00; an acceptance of said offer; and, consideration in the form of an agreement to a
15 release of all claims, as well as the waiver of Plaintiff's right to request that this matter proceed
16 to a short trial. Moreover, Plaintiff relied upon the settlement by not seeking a short trial.

17 **THE COURT FURTHER FINDS** that on March 25, 2020, Mr. Erich Storm, an employee of
18 Key Insurance and assigned counsel for Defendant Arce, filed a Judgment on Arbitration Award
19 despite having knowledge that this case had previously settled on February 20, 2020.

20 **THE COURT FURTHER FINDS** that the negotiations and settlement agreement of February
21 20, 2020 between Mr. Deaver and Ms. Cervantes were not violative of any rule (legal, ethical, or
22 otherwise), including but not limited to Nevada Rule of Professional Conduct 4.2 as the
23 communication with Ms. Cervantes was not a communication with a person represented by
24

1 counsel as there is a distinction between in-house counsel and other counsel hired by an insurance
2 company to represent it insureds. Moreover, the communications were not against public policy
3 and therefore the contract for settlement entered on said date is not void.

4 **THE COURT THEREFORE CONCLUDES** that a lawful, binding and enforceable contract
5 was entered into on February 20, 2020, the terms of which include that Plaintiff Patricia Sanchez
6 accepts the amount of \$10,000.00 in exchange for her full and final release of claims against
7 Defendant Arce, thereby waiving her right to a short trial, and concludes that this contract is to
8 be enforced and that Key Insurance must pay the sum of \$10,000.00 to Plaintiff Sanchez, on
9 behalf of its insured, Defendant Arce, in exchange for the release of all claims per the terms of
10 the agreement.

11 **THE COURT FURTHER CONCLUDES** that the Judgment filed by Mr. Erich Storm on March
12 25, 2020 should be vacated considering the settlement of this matter on February 20, 2020.

13 **THEREFORE, IT IS HEREBY ORDERED** that Plaintiff's Motion for Relief from Judgment
14 and to Enforce Settlement is **GRANTED**, and that the Judgment filed on March 25, 2020 is
15 vacated.

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Defendant Arce is ordered to pay \$10,000.00 to Ms. Sanchez, through his insurer Key Insurance, in exchange for Plaintiff Sanchez's full and final release of all claims against him.

DATED this 15th day of September, 2020.

DATED this 15th day of September, 2020.

DEAVER | CRAFTON

STORM LEGAL GROUP

Approved as to Form and Content

/s/ BRICE J. CRAFTON, ESQ.

/s/ ERICH N. STORM, ESQ.

BRICE J. CRAFTON, ESQ.
NEVADA Bar No. 10558
810 E. Charleston Blvd.
Las Vegas, NV 89104
Attorneys for Plaintiff

ERICH N. STORM, ESQ.
Nevada Bar No. 4480
3057 E. Warm Springs Road, Suite 400
Las Vegas, NV 89120
Attorney for Defendant

ORDER

IT IS SO ORDERED, that Plaintiff's Motion for Relief From Judgment and to Enforce Settlement is **GRANTED**.

DATED this ____ day of ____, 2020.

Dated this 15th day of September, 2020

Nancy L Alf
DISTRICT COURT JUDGE

Respectfully Submitted by:

8AB 16D 75BF 1DDC
Nancy Alf
District Court Judge

DEAVER | CRAFTON

/s/ BRICE J. CRAFTON, ESQ.

BRICE J. CRAFTON, ESQ.
NEVADA Bar No. 10558
810 E. Charleston Blvd.
Las Vegas, NV 89104
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that I am an employee of DEAVER | CRAFTON, and that on the 15th day of September, 2020, pursuant to NRCP 5(b), I am serving the attached copy of **ORDER GRANTING PLAINTIFF'S MOTION FOR RELIEF FROM JUDGMENT AND TO ENFORCE SETTLEMENT** on the party(s) set forth below by:

☐ Placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Las Vegas, Nevada, postage prepaid, following ordinary business practices.

☐ Via Facsimile (Fax)

☒ Electronically served through the Eighth Judicial District Court's Electronic filing system:

Erich N. Storm, Esq.
STORM LEGAL GROUP
3057 E. Warm Springs Road
Suite 400
Las Vegas, NV 89120
Attorney for Defendant

/s/ Shannon Shaffer

An employee of DEAVER | CRAFTON



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Sent

Drafts 65

Cynthia Missed

More

Meet

Start a meeting

Join a meeting

Hangouts



Shannon



Begin forwarded message:

From: Erich Storm <EStorm@keyinsco.com>
Date: September 15, 2020 at 2:34:39 PM PDT
To: Brice Crafton <brice@deavercrafton.com>
Subject: RE: Sanchez

All right, go ahead and put my e-signature on it

Thanks,

Erich N. Storm
STORM LEGAL GROUP
3057 East Warm Springs Road
#400
Las Vegas NV 89120
702-765-0976

From: Brice Crafton <brice@deavercrafton.com>
Sent: Tuesday, September 15, 2020 11:39 AM
To: Erich Storm <EStorm@keyinsco.com>
Subject: Re: Sanchez

Erich, please find the revised order. Review and let me know if you have any further modifications. If not, I

No recent chats
Start a new one

Best Regards,

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

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5
6 Patricia Sanchez, Plaintiff(s)

CASE NO: A-19-796822-C

7 vs.

DEPT. NO. Department 27

8 Juan Arce, Defendant(s)

9
10 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 9/15/2020

15 Brice Crafton

brice@deavercrafton.com

16 Lisa McMillan

lmcmillan@cooperlevenson.com

17 Cynthia Villanueva

cynthia@deavercrafton.com

18 Shannon Shafffer

shannon@deavercrafton.com

19 Valeria Guerra

valeria@deavercrafton.com

20 Kristin Orque

korque@purdyandanderson.com

21 Erich Storm

estorm@keyinsco.com

22 Star Farrow

Sfarrow@keyinsco.com

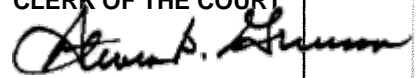
24

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28



1 **NEO**
NATHAN S. DEAVER, ESQ.
2 Nevada Bar No. 11947
BRICE J. CRAFTON, ESQ.
3 Nevada Bar No. 10558
DEAVER | CRAFTON
4 810 E. Charleston Blvd.
Las Vegas, NV 89104
5 Tel. (702)385-5969
Fax. (702)385-6939
6 *Attorneys for Plaintiff*

7 **DISTRICT COURT**

8 **COUNTY OF CLARK, NEVADA**

9 PATRICIA SANCHEZ, an individual;

10 Plaintiff,

Case No. A- 19-796822-C

11 vs.

Dept. No. XXVII

12 JUAN MILLAN ARCE, an individual; DOES
13 I-X, inclusive; and ROE CORPORATIONS I-
X, inclusive;

14 Defendants.

15 PLEASE TAKE NOTICE that an Order was entered in the above entitled matter on
16 September 15, 2020. A copy is attached hereto.

17 DATED this 17th day of September, 2020.

18 **DEAVER | CRAFTON**

19 */s/ BRICE J. CRAFTON, ESQ.*

20 BRICE J. CRAFTON, ESQ.
21 NEVADA Bar No. 10558
22 810 E. Charleston Blvd.
23 Las Vegas, NV 89104
24 *Attorneys for Plaintiff*

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CERTIFICATE OF SERVICE

I certify that I am an employee of DEAVER | CRAFTON, and that on the 17th day of September, 2020, pursuant to NRCP 5(b), I am serving the attached copy of **NOTICE OF ENTRY OF ORDER** on the party(s) set forth below by:

____ Placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Las Vegas, Nevada, postage prepaid, following ordinary business practices.

____ Via Facsimile (Fax)

 X Electronically served through the Eighth Judicial District Court’s Electronic filing system:

ERICH N. STORM, ESQ.
STORM LEGAL GROUP
3057 East Warm Springs Road, Suite 400
Las Vegas, NV 89120
Attorney for Defendant

/s/ SHANNON SHAFFER

An employee of DEAVER | CRAFTON

Shannon S. Hemin
CLERK OF THE COURT

1 **ORDR**
NATHAN S. DEEVER, ESQ.
2 Nevada Bar No. 11947
BRICE J. CRAFTON, ESQ.
3 Nevada Bar No. 10558
DEEVER | CRAFTON
4 810 E. Charleston Blvd.
Las Vegas, NV 89104
5 brice@deavercrafton.com
shannon@deavercrafton.com
6 Tel. (702)385-5969
Fax. (702)385-6939
7 *Attorneys for Plaintiff*

8 **DISTRICT COURT**
9 **COUNTY OF CLARK, NEVADA**

10 PATRICIA SANCHEZ, an individual;

11 Plaintiff,

Case No. A- 19-796822-C

12 vs.

Dept. No. XXVII

13 JUAN MILLAN ARCE, an individual; DOES
14 I-X, inclusive; and ROE CORPORATIONS I-
X, inclusive;

15 Defendants.

16 **ORDER GRANTING PLAINTIFF'S MOTION FOR RELIEF FROM**
17 **JUDGMENT AND TO ENFORCE SETTLEMENT**

18 The Motion for Relief from Judgment and to Enforce Settlement, having come before the
19 Court on June 11, 2020 at 3:30pm, and the Court, having reviewed the papers submitted by the
20 parties and heard the arguments of counsel, finds, concludes, and orders the Motion **GRANTED**,
21 as set forth below, which is based upon Plaintiff's factual summary as outlined in Plaintiff's
22 moving papers, which the court adopts, and the moving papers, including the citations to legal
23 authorities, which the court finds persuasive:

THE COURT FINDS that Defendant was an insured of Key Insurance Company, Inc., at all relevant times, and provided a defense to Defendant with respect to this matter. Erika Cervantes was an employee of Key Insurance Company, Inc. and was the claims adjuster assigned to this matter.

THE COURT FURTHER FINDS that a settlement was reached in this matter on February 20, 2020 during a telephone conversation between Plaintiff's counsel, Mr. Nathan Deaver and Erika Cervantes. During that conversation, Ms. Cervantes agreed to pay the sum of \$10,000.00 and was to send Mr. Deaver a release regarding the same. This settlement was reached specifically to avoid the need for Plaintiff to file a request for short trial after an arbitration award was submitted on February 11, 2020.

THE COURT FURTHER FINDS that pursuant to the settlement discussions had, and agreements reached, between Mr. Deaver and Ms. Cervantes on February 20, 2020, a valid, binding, and enforceable contract for settlement was entered, which included: an offer to settle for \$10,000.00; an acceptance of said offer; and, consideration in the form of an agreement to a release of all claims, as well as the waiver of Plaintiff's right to request that this matter proceed to a short trial. Moreover, Plaintiff relied upon the settlement by not seeking a short trial.

THE COURT FURTHER FINDS that on March 25, 2020, Mr. Erich Storm, an employee of Key Insurance and assigned counsel for Defendant Arce, filed a Judgment on Arbitration Award despite having knowledge that this case had previously settled on February 20, 2020.

THE COURT FURTHER FINDS that the negotiations and settlement agreement of February 20, 2020 between Mr. Deaver and Ms. Cervantes were not violative of any rule (legal, ethical, or otherwise), including but not limited to Nevada Rule of Professional Conduct 4.2 as the communication with Ms. Cervantes was not a communication with a person represented by

1 counsel as there is a distinction between in-house counsel and other counsel hired by an insurance
2 company to represent it insureds. Moreover, the communications were not against public policy
3 and therefore the contract for settlement entered on said date is not void.

4 **THE COURT THEREFORE CONCLUDES** that a lawful, binding and enforceable contract
5 was entered into on February 20, 2020, the terms of which include that Plaintiff Patricia Sanchez
6 accepts the amount of \$10,000.00 in exchange for her full and final release of claims against
7 Defendant Arce, thereby waiving her right to a short trial, and concludes that this contract is to
8 be enforced and that Key Insurance must pay the sum of \$10,000.00 to Plaintiff Sanchez, on
9 behalf of its insured, Defendant Arce, in exchange for the release of all claims per the terms of
10 the agreement.

11 **THE COURT FURTHER CONCLUDES** that the Judgment filed by Mr. Erich Storm on March
12 25, 2020 should be vacated considering the settlement of this matter on February 20, 2020.

13 **THEREFORE, IT IS HEREBY ORDERED** that Plaintiff's Motion for Relief from Judgment
14 and to Enforce Settlement is **GRANTED**, and that the Judgment filed on March 25, 2020 is
15 vacated.

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DEAVER | CRAFTON

ATTORNEYS AT LAW

Defendant Arce is ordered to pay \$10,000.00 to Ms. Sanchez, through his insurer Key Insurance, in exchange for Plaintiff Sanchez's full and final release of all claims against him.

DATED this 15th day of September, 2020.

DATED this 15th day of September, 2020.

DEAVER | CRAFTON

STORM LEGAL GROUP

Approved as to Form and Content

/s/ BRICE J. CRAFTON, ESQ.

/s/ ERICH N. STORM, ESQ.

BRICE J. CRAFTON, ESQ.
NEVADA Bar No. 10558
810 E. Charleston Blvd.
Las Vegas, NV 89104
Attorneys for Plaintiff

ERICH N. STORM, ESQ.
Nevada Bar No. 4480
3057 E. Warm Springs Road, Suite 400
Las Vegas, NV 89120
Attorney for Defendant

ORDER

IT IS SO ORDERED, that Plaintiff's Motion for Relief From Judgment and to Enforce Settlement is **GRANTED**.

DATED this ____ day of ____, 2020.

Dated this 15th day of September, 2020

Nancy L Alf
DISTRICT COURT JUDGE

Respectfully Submitted by:

8AB 16D 75BF 1DDC
Nancy Alf
District Court Judge

DEAVER | CRAFTON

/s/ BRICE J. CRAFTON, ESQ.

BRICE J. CRAFTON, ESQ.
NEVADA Bar No. 10558
810 E. Charleston Blvd.
Las Vegas, NV 89104
Attorneys for Plaintiff

DEAVER | CRAFTON

ATTORNEYS AT LAW

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CERTIFICATE OF SERVICE

I certify that I am an employee of DEAVER | CRAFTON, and that on the 15th day of September, 2020, pursuant to NRCP 5(b), I am serving the attached copy of **ORDER GRANTING PLAINTIFF'S MOTION FOR RELIEF FROM JUDGMENT AND TO ENFORCE SETTLEMENT** on the party(s) set forth below by:

_____ Placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Las Vegas, Nevada, postage prepaid, following ordinary business practices.

_____ Via Facsimile (Fax)

 X Electronically served through the Eighth Judicial District Court's Electronic filing system:

Erich N. Storm, Esq.
STORM LEGAL GROUP
3057 E. Warm Springs Road
Suite 400
Las Vegas, NV 89120
Attorney for Defendant

/s/ Shannon Shaffer

An employee of DEAVER | CRAFTON

Compose


Inbox 3

Starred

Snoozed

Sent

Drafts 65

 Cynthia Missed

More

Meet

Start a meeting

Join a meeting

Hangouts

 Shannon +

No recent chats
Start a new one

Begin forwarded message:

From: Erich Storm <EStorm@keyinsco.com>
Date: September 15, 2020 at 2:34:39 PM PDT
To: Brice Crafton <brice@deavercrafton.com>
Subject: RE: Sanchez

All right, go ahead and put my e-signature on it

Thanks,

Erich N. Storm
STORM LEGAL GROUP
3057 East Warm Springs Road
#400
Las Vegas NV 89120
702-765-0976

From: Brice Crafton <brice@deavercrafton.com>
Sent: Tuesday, September 15, 2020 11:39 AM
To: Erich Storm <EStorm@keyinsco.com>
Subject: Re: Sanchez

Erich, please find the revised order. Review and let me know if you have any further modifications. If not, I

Best Regards,

1 CSERV

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA

4
5
6 Patricia Sanchez, Plaintiff(s)

CASE NO: A-19-796822-C

7 vs.

DEPT. NO. Department 27

8 Juan Arce, Defendant(s)
9

10 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 9/15/2020

15 Brice Crafton

brice@deavercrafton.com

16 Lisa McMillan

lmcmillan@cooperlevenson.com

17 Cynthia Villanueva

cynthia@deavercrafton.com

18 Shannon Shafffer

shannon@deavercrafton.com

19 Valeria Guerra

valeria@deavercrafton.com

20 Kristin Orque

korque@purdyandanderson.com

21 Erich Storm

estorm@keyinsco.com

22 Star Farrow

Sfarrow@keyinsco.com
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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Negligence - Auto**COURT MINUTES****April 24, 2020**

A-19-796822-C Patricia Sanchez, Plaintiff(s)
vs.
Juan Arce, Defendant(s)

April 24, 2020**3:00 AM****Minute Order**

**Minute Order:
Plaintiff s Motion for
Relief from Judgment
and to Enforce
Settlement set
4/29/2020
CONTINUED to
6/10/2020**

HEARD BY: Allf, Nancy**COURTROOM:** No Location**COURT CLERK:** Nicole McDevitt**RECORDER:****REPORTER:****PARTIES****PRESENT:**

JOURNAL ENTRIES

- COURT FINDS after review that on March 27, 2020, Plaintiff s Motion for Relief from Judgment and to Enforce Settlement (the Motion) was filed. The Motion was set for April 29, 2020 at 9:00 a.m. on Motions Calendar.

COURT FURTHER FINDS after review pursuant to Administrative Order 20-01 in response to COVID-19 concerns, all currently scheduled non-essential District Court hearings are ordered to be conducted by video or telephone means, decided on the papers, or rescheduled unless otherwise directed by a District Court Judge. Moreover, Administrative Order 20-13 provides that AO 20-01 will remain in effect and all deadlines provided therein will be extended unless modified or rescinded by a subsequent order.

THEREFORE, COURT ORDERS for good cause appearing and after review pursuant to Administrative Orders 20-01 and 20-13, the Motion set for hearing on April 29, 2020 is hereby CONTINUED to June 10, 2020 at 9:00 a.m.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Nicole McDevitt, to all registered parties for Odyssey File & Serve. /nm 4/24/2020

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Negligence - Auto

COURT MINUTES

June 04, 2020

A-19-796822-C Patricia Sanchez, Plaintiff(s)
vs.
Juan Arce, Defendant(s)

June 04, 2020 3:00 AM Minute Order

HEARD BY: Allf, Nancy **COURTROOM:** No Location

COURT CLERK: Nicole McDevitt

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- COURT FINDS after review the Plaintiff's Motion for Relief from Judgment and to Enforce Settlement filed March 27, 2020 was set for Motions Calendar on June 10, 2020.

COURT FURTHER FINDS after review pursuant to Administrative Order 20-01 in response to COVID-19 concerns, all currently scheduled non-essential District Court hearings are ordered to be conducted by video or telephone means, decided on the papers, or rescheduled unless otherwise directed by a District Court Judge. Moreover, Administrative Order 20-13 provides that AO 20-01 will remain in effect and all deadlines provided therein will be extended unless modified or rescinded by a subsequent order.

THEREFORE, COURT ORDERS for good cause appearing and after review pursuant to Administrative Orders 20-01 and 20-13, the matter set for hearing on June 10, 2020 is hereby CONTINUED to June 11, 2020 at 3:30 p.m. The parties shall appear remotely through BlueJeans.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Nicole McDevitt, to all registered parties for Odyssey File & Serve. /nm 6/4/2020

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Negligence - Auto

COURT MINUTES

June 11, 2020

A-19-796822-C Patricia Sanchez, Plaintiff(s)
vs.
Juan Arce, Defendant(s)

June 11, 2020 3:30 PM Motion for Relief

HEARD BY: Alf, Nancy **COURTROOM:** RJC Courtroom 03A

COURT CLERK: Nicole McDevitt

RECORDER: Brynn White

REPORTER:

PARTIES

PRESENT: Crafton, Brice J. Attorney
 Storm, Erich N. Attorney

JOURNAL ENTRIES

- Court noted procedures in place as to hearing and trials due to the COVID-19 pandemic. Arguments by counsel regarding the merits of and opposition to the motion. Court stated its findings and ORDERED, Plaintiff's Motion for Relief from Judgment and to Enforce Settlement GRANTED. Mr. Crafton to prepare the order, including findings of fact and conclusions of law, and submit it to opposing counsel for approval prior to e-mail submission to the court.



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

ERICH N. STORM, ESQ.
3057 EAST WARM SPRINGS RD., STE 400
LAS VEGAS, NV 89120

DATE: September 29, 2020
CASE: A-19-796822-C

RE CASE: PATRICIA SANCHEZ vs. JUAN MILLAN ARCE

NOTICE OF APPEAL FILED: September 28, 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
 - *Previously paid Bonds are not transferable between appeals without an order of the court.*
- ☐ 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; CASE APPEAL STATEMENT; DISTRICT COURT
DOCKET ENTRIES; CIVIL COVER SHEET; ORDER GRANTING PLAINTIFF'S MOTION FOR
RELIEF FROM JUDGMENT AND TO ENFORCE SETTLEMENT; NOTICE OF ENTRY; DISTRICT
COURT MINUTES; NOTICE OF DEFICIENCY

PATRICIA SANCHEZ,

Plaintiff(s),

vs.

JUAN MILLAN ARCE,

Defendant(s),

Case No: A-19-796822-C

Dept No: XXVII

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 29 day of September 2020.

Steven D. Grierson, Clerk of the Court



Amanda Hampton, Deputy Clerk