

IN THE SUPREME COURT OF THE STATE OF NEVADA

TODD MATTHEW PHILLIPS,

Appellant,

vs.

AMBER PHILLIPS, N/K/A

AMBER KORPAK,

Respondent.

Electronically Filed
Jul 12 2021 02:48 p.m.
Elizabeth A. Brown
Clerk of Supreme Court
Supreme Court No: 82414
District Court Case No: D-18-578142-D

**APPENDIX TO RESPONDENT'S
OPPOSITION TO APPELLANT'S
SECOND MOTION TO FILE
AMENDED FAST TRACK
STATEMENT AND
COUNTER-MOTIONS FOR
EXTENSION OF TIME TO FILE
FAST TRACK RESPONSE**

Chronological Index

Doc No.	Description	Bates Nos.
A	Affidavit of S. Wilson	PLTF001235-001236
B	Emails between S. Wilson and T. Phillips re Extension to File Opposition	PLTF001237-001239
C	Emails from T Phillips Threatening Lawsuit on H&S if his son does not answer his phone	PLTF001240-001246
D	Emails from T Phillips re New Lawsuit on A Korpak fka A Phillips	PLTF001247-001452
E	Emails from T Phillips re Lawsuit on H&S and S Wilson	PLTF001253-1256

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C	Emails from T Phillips Threatening Lawsuit on H&S if his son does not answer his phone	PLTF001240-001246

Respectfully submitted this 12th day of July, 2021.

HUTCHISON & STEFFEN, PLLC

/s/ Shannon R. Wilson

Shannon R. Wilson (9933)
Peccole Professional Park
10080 West Alta Drive, Suite 200
Las Vegas, NV 89145
swilson@hutchlegal.com

Attorney for Respondent

CERTIFICATE OF SERVICE

I certify that I am an employee of HUTCHISON & STEFFEN, PLLC and that on this date the ***APPENDIX TO RESPONDENT'S MOTION FOR AN EXTENSION OF TIME TO FILE RESPONSE TO FAST TRACK STATEMENT (FIRST REQUEST)*** was filed electronically with the Clerk of the Nevada Supreme Court, and a copy was mailed via U.S. mail to the attorneys/parties below:

T. Matthew Phillips
4894 W. Lone Mountain Rd., No. 132
Las Vegas, NV 89130

tmatthewphillips@aol.com

Appellant in Proper Person

DATED this 12th day of July, 2021.

/s/ Bobbie Benitez

An employee of Hutchison & Steffen, PLLC

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EXHIBIT PAGE ONLY



EXHIBIT A

1 **AFFIDAVIT of SHANNON R. WILSON**
2 **IN SUPPORT OF PLAINTIFF AMBER PHILLIPS'S MOTION FOR**
3 **EXTENSION TO FILE OPPOSITIONS**

4 STATE OF NEVADA)
5) ss
6 COUNTY OF CLARK)

7 Shannon R. Wilson being first duly sworn, according to oath, deposes and says:

8 1. My name is Shannon R. Wilson, I am counsel for Plaintiff Amber Phillips nka
9 Amber Korpak in the action styled Amber Phillips v. Todd Matthew Phillips, Case No. D-18-
10 578142-D, lodged in the Eight Judicial District Court, Clark County, Nevada. I am over the age
11 of eighteen, I am competent to testify, and I make this affidavit based on personal knowledge.

12 2. On June 24, 2021, I became aware of a notice of hearing filed in Case No. D-18-
13 578142-D on June 23, 2021. This prompted me to look at the district court's on-line docket
14 where I discovered two motions filed by Defendant Todd Matthew Phillips, one filed on June
15 16, 2021 and the other filed on June 17, 2021. I was not served with these motions. Indeed,
16 throughout the course of this litigation, Phillips attaches certificates of service to his various
17 papers, but rarely, if ever, does he serve anything by e-service or U.S. mail. Very occasionally,
18 Mr. Phillips will direct-email something to the undersigned counsel, which is not good service,
19 but these particular motions were not served in any manner.

20 //

21 //

22 //

23 //


24 //

25 //

3. On June 28, 2021, I emailed Mr. Phillips to request an extension of time to file oppositions to his motions as is required by EDCR 5.512. A true and correct copy of the email chain between Mr. Phillips and I is attached as Exhibit 2 to Plaintiff's Motion for an Extension of Time. As of drafting this affidavit (3:50 p.m. on July 2, 2021), I have received no further communication from Mr. Phillips on this issue.

4. Affiant does hereby affirm under penalty of perjury that the assertions of this affidavit are true.

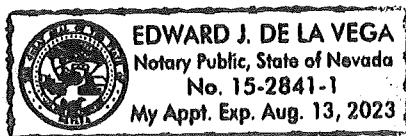
Furthermore, this affiant sayeth naught.


Shannon R. Wilson

[illegible]

Subscribed and sworn to before me

this 2nd day of June, 2021 by Shannon R Wilson
(Affiant)



Chris O. M. J. P.
NOTARY PUBLIC

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EXHIBIT PAGE ONLY



EXHIBIT B

Shannon R. Wilson

From: Shannon R. Wilson
Sent: Wednesday, June 30, 2021 4:32 PM
To: TMatthewPhillips
Cc: Kaylee Conradi
Subject: RE: Phillips - extension for opposition

Dear Mr. Phillips,

EDCR 5.501 does not apply to requests for extension of time. EDCR 5.512 is the applicable rule. It is customary to grant extensions merely because they are requested without giving any reasons. Notably, you did not ask me for the reasons I requested an extension, you asked me to negotiate, which any reasonable attorney would presume meant substantive, not procedural issues. If you must have reasons, among others: (1) you do not serve me with motions, so I only learn about them upon receipt of the Court's notice of hearing; and (2) you have an appeal pending that includes an absurd number of frivolous issues that have no foundation in law or fact, but nevertheless I am required to file a response brief that is due July 12.

Do you agree with the extension or not?

Sincerely,

From: TMatthewPhillips <tmatthewphillips@aol.com>
Sent: Wednesday, June 30, 2021 12:14 PM
To: Shannon R. Wilson <SWilson@hutchlegal.com>
Cc: Kaylee Conradi <kconradi@hutchlegal.com>
Subject: Re: Phillips - extension for opposition

Dear Ms. Wilson,

You presume in error.

This is an exemplary example as to why *nothing* in this case has ever been settled outside of Court. It is clear that the matter in your email was an extension of time, was it not? Instead of offering a reason as to why you needed the extension, where I specifically asked your "thoughts" on the matter, you contrived a bombastic response, with a delusion that my words don't represent my true intent.

A dignified and professional attorney, representing their client's best interests would have discussed the "reason" for the extension requested; how it would affect my time to reply; and if it weighed in all parties' favor to continue the hearing date to make sure all have an opportunity to be heard. Instead, you allowed your scathing animosity for me to outweigh your duty to represent your client's best interests.

I asked for your thoughts on the matter Ms. Wilson, but you have yet to provide such. Instead you chose to scold me on a completely unrelated issue - Donna's House.

T. Matthew Phillips
Attorney-at-Law
(323) 314-6996

-----Original Message-----

From: Shannon R. Wilson <SWilson@hutchlegal.com>
To: TMatthewPhillips <tmatthewphillips@aol.com>
Cc: Kaylee Conradi <kconradi@hutchlegal.com>
Sent: Tue, Jun 29, 2021 6:22 pm
Subject: RE: Phillips - extension for opposition

Dear Mr. Phillips,

The rule you cite below, EDCR 5.501 requires a party to attempt to resolve a matter *before* a motion is filed. You already filed these motions.

What is it that you would like to negotiate? Presumably, you are not asking me to negotiate a resolution of the pending motions, i.e., the court's subject matter jurisdiction and allegations of fraud against Ms. Korpak. Rather, I presume you are seeking to negotiate custody or visitation with your son.

As I have written to you at other times, the Court's orders from February of 2019 to now provide the means to allow you to see and re-unify with your son. Consequently, there is nothing to negotiate. You can avail yourself of those means or not, the choice is yours. I confirmed with Ms. Korpak that she has nothing else to offer beyond what the Court has ordered.

Assuming that you remain disinclined to avail yourself of those means, i.e., reunification therapy or Donna's House visits, and further assuming you will not withdraw the pending motions for which I requested an extension to file an opposition, will you please advise whether you consent to the requested extension so that I may prepare the stipulation and order as required by EDCR 5.512 or file a motion to seek the extension if need be?

Sincerely,

From: TMatthewPhillips <tmatthewphillips@aol.com>
Sent: Monday, June 28, 2021 6:11 PM
To: Shannon R. Wilson <SWilson@hutchlegal.com>
Cc: Kaylee Conradi <kconradi@hutchlegal.com>
Subject: Re: Phillips - extension for opposition

Dear Ms. Wilson,

I believe it would be most exemplary if we could start a process to negotiate - prior to using the Court's precious time. Would you be so kind as to send me your thoughts on this matter? Hopefully we can come to a resolution without expending time and money that would be better spent on my son, Donovan.

Sincerely,

T. Matthew Phillips

Rule 5.501. Requirement to attempt resolution.

(a) Except as otherwise provided herein or by other rule, statute, or court order, before any family division matter motion is filed, the movant must attempt to resolve the issues in dispute with the other party.

(b) A party filing a motion in which no attempt was made to resolve the issues in dispute with the other party shall include a statement within the motion of what provision, futility, or impracticability prevented an attempt at resolution in advance of filing.

(c) Failure to comply with this rule may result in imposition of sanctions if the court concludes that the issues would have been resolved if an attempt at resolution had been made before filing.

T. Matthew Phillips
Attorney-at-Law
(323) 314-6996

-----Original Message-----

From: Shannon R. Wilson <SWilson@hutchlegal.com>
To: TMatthewPhillips <tmatthewphillips@aol.com>
Cc: Kaylee Conradi <kconradi@hutchlegal.com>
Sent: Mon, Jun 28, 2021 3:53 pm
Subject: Phillips - extension for opposition

Dear Mr. Phillips,

You have two motions pending in the district court D-case, which were filed on June 16 and June 17, 2021. One or both of these has been set by the Court for hearing on August 11, 2021. May I have an extension to July 21, 2021 to file the oppositions?

Sincerely,

Shannon R. Wilson

Partner



HUTCHISON & STEFFEN, PLLC

(702) 385-2500

hutchlegal.com

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Shannon R. Wilson

Partner



HUTCHISON & STEFFEN, PLLC

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EXHIBIT PAGE ONLY



EXHIBIT C

Shannon R. Wilson

From: TMatthewPhillips <tmatthewphillips@aol.com>
Sent: Friday, June 11, 2021 11:42 AM
To: Shannon R. Wilson
Cc: Mark A. Hutchison
Subject: LEGAL NOTICE

Dear Ms. Wilson,

Some time ago, Amber was ordered to make Donovan available for phone calls. To date, she has never once made him available. This, as you know, is considered interference.

Per the terms of the court order, dated Dec. 19, 2020, I am to have contact with Donovan twice a week. Donovan must be made available at 6:30 p.m. on Wednesdays and Sundays for phone calls.

When I call Donovan's phone number -- at 6:30 p.m. this coming Sunday -- I expect to hear his voice.

If for any reason Donovan does not answer -- at 6:30 p.m. this coming Sunday -- then I will sue YOU, Hutch-Legal, and Amber, with no further notice.

T. Matthew Phillips
Attorney-at-Law
(323) 314-6996

Shannon R. Wilson

From: Shannon R. Wilson
Sent: Friday, June 11, 2021 7:42 PM
To: TMatthewPhillips
Cc: Mark A. Hutchison
Subject: RE: LEGAL NOTICE

Dear Mr. Phillips,

The Court's order entered on June 10, 2019, stated in relevant part, "Dad can call his son at 7:30 p.m. on Tuesday and Thursday. Mother can tape the calls. The Court is concerned and wants to protect the son from this litigation and harassment."

The Court's order entered December 19, 2020, superseding the June 10, 2019 order, stated in relevant part, "Defendant may call the child on Wednesdays and Sundays at 6:30 p.m. and the child may freely call Defendant."

Neither of these orders directs Ms. Korpak to "to make Donovan available for phone calls." At the time of the 2019 order, Donovan was 13 ½, and he is now 15 ½. At all times since Ms. Korpak and Donovan left the marital residence, Donovan had his own phone and you have the phone number.

These orders did provide that Donovan could make contact with you at any time he chose. Still other avenues were made available for you to have contact with Donovan, of which you have failed and refused to avail yourself.

A lawsuit, motion, or any other legal action by you against Ms. Korpak, Hutchison & Steffen, or me would be in contravention of Rule 11 of the Rules of Civil Procedure and the very definition of an action or claim brought without reasonable ground or to harass the prevailing party pursuant to NRS 18.010.

Sincerely,

From: TMatthewPhillips <tmatthewphillips@aol.com>
Sent: Friday, June 11, 2021 11:42 AM
To: Shannon R. Wilson <SWilson@hutchlegal.com>
Cc: Mark A. Hutchison <MHutchison@hutchlegal.com>
Subject: LEGAL NOTICE

Dear Ms. Wilson,

Some time ago, Amber was ordered to make Donovan available for phone calls. To date, she has never once made him available. This, as you know, is considered interference.

Per the terms of the court order, dated Dec. 19, 2020, I am to have contact with Donovan twice a week. Donovan must be made available at 6:30 p.m. on Wednesdays and Sundays for phone calls.

When I call Donovan's phone number -- at 6:30 p.m. this coming Sunday -- I expect to hear his voice.

If for any reason Donovan does not answer -- at 6:30 p.m. this coming Sunday -- then I will sue YOU, Hutch-Legal, and Amber, with no further notice.

T. Matthew Phillips

Shannon R. Wilson

From: TMatthewPhillips <tmatthewphillips@aol.com>
Sent: Saturday, June 12, 2021 7:53 AM
To: Shannon R. Wilson
Cc: Mark A. Hutchison
Subject: Intentional Interference with Federal Rights

The Court did not order that Donovan has discretion to take my calls (or not). Reasonable attorneys understand what the telephonic order entails.

You play a game of semantics—arguing there is no wording that says, “Amber must make Donovan available.” But it’s implied in the court’s verbiage.

Amber has a duty to make the child available. Why?—because it’s Amber’s responsibility to follow court orders (not Donovan’s). Donovan should not (must not) have knowledge of any court order.

Amber has a duty to see my rights upheld. She now **interferes** with those rights.

So too, when YOU give Amber bad legal advice, YOU **interfere** with my rights.

YOU and Amber intentionally **interfere** with that federally protected right.

YOU, Amber, and Hutch-Legal conspire to violate federal law.

My previous email still stands. I expect Donovan to answer the phone at 6:30 p.m. on Sunday. If not, we go to court, and you can rack-up another \$179k attorney’s fees award, which you can frame and hang on the wall.

P.S. Frankly, you’ve been lucky in court up until now—but only because Ochoa is crooked. I am curious to see how you litigate in front of a judge to whom you’re NOT giving money.

T. Matthew Phillips
Attorney-at-Law
(323) 314-6996

Shannon R. Wilson

From: TMatthewPhillips <tmatthewphillips@aol.com>
Sent: Saturday, June 12, 2021 8:39 AM
To: Shannon R. Wilson
Cc: Mark A. Hutchison
Subject: Re: Intentional Interference with Federal Rights

Then you can spend all your time and money proving I'm incorrect.

T. Matthew Phillips
Attorney-at-Law
(323) 314-6996

-----Original Message-----

From: Shannon R. Wilson <SWilson@hutchlegal.com>
To: TMatthewPhillips <tmatthewphillips@aol.com>
Cc: Mark A. Hutchison <MHutchison@hutchlegal.com>
Sent: Sat, Jun 12, 2021 8:31 am
Subject: Re: Intentional Interference with Federal Rights

Dear Mr. Phillips,

Each and every piece of your analysis is incorrect.

Sincerely,

Sent from my iPad

On Jun 12, 2021, at 7:53 AM, TMatthewPhillips <tmatthewphillips@aol.com> wrote:

The Court did not order that Donovan has discretion to take my calls (or not). Reasonable attorneys understand what the telephonic order entails.

You play a game of semantics—arguing there is no wording that says, “Amber must make Donovan available.” But it’s implied in the court’s verbiage.

Amber has a duty to make the child available. Why?—because it’s Amber’s responsibility to follow court orders (not Donovan’s). Donovan should not (must not) have knowledge of any court order.

Amber has a duty to see my rights upheld. She now **interferes** with those rights.

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T. Matthew Phillips
Attorney-at-Law
(323) 314-6996

Shannon R. Wilson
Partner



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Shannon R. Wilson

From: TMatthewPhillips <tmatthewphillips@aol.com>
Sent: Sunday, June 13, 2021 2:11 PM
To: Shannon R. Wilson
Cc: Mark A. Hutchison
Subject: June 13, 2021
Attachments: June 13, 2021.JPG

Wilson,

Regardless of what happens at 6:30 today, I'm going to sue you and Hutch-Legal.

T. Matthew Phillips
Attorney-at-Law
(323) 314-6996

1. T. MATTHEW PHILLIPS

Plaintiff(s)

vs.

A. VINCENT OCHOA

B. SHANNON WILSON

C. HUTCHISON STEFFEN

LAW FIRM

D. AMBER KORPAK

Defendant(s).

Plaintiff Demands Trial

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EXHIBIT PAGE ONLY



EXHIBIT D

Shannon R. Wilson

From: TMatthewPhillips <tmatthewphillips@aol.com>
Sent: Thursday, June 17, 2021 7:34 AM
To: Shannon R. Wilson
Cc: Mark A. Hutchison
Subject: Service of Process

To: Wilson--

I have a new lawsuit for Korpak. Will you accept service of process?

If not, I'm going to direct the process server to tag Korpak at her house.

In order to keep the peace, I am calling on YOU, (Wilson), as a officer of the court, to act in the highest aspirational capacity and accept service of process for Korpak. If you accept service, she may take extra time to file a responsive pleading.

If you refuse, (which I anticipate), I shall have Korpak personally served at her house; however, this may be awkward for Donovan, which is why I ask YOU, (Wilson), to be professional and accept service of process for your client.

Note also, YOU (Wilson) and Hutch Legal are also defendants in this new lawsuit.

I asked Mark Hutchison to accept service, but his arrogance refuses to permit him to even communicate with me. Therefore, a process server will shortly be at YOUR office to tag YOU and Hutch Legal.

Knowing that Rule 11 forbids tactics that "needlessly increase litigation costs," it makes sense to effectuate service on all three defendants (Korpak, Wilson, and Hutch Legal) in one felled swoop.

When all's said, it makes sense -- to save money and avoid upset -- for you to do the right thing and accept service for Korpak.

The court will see this email, I am trying to show how reasonable I am.

If I am forced to serve Korpak at her home, I don't want to hear you and Korpak bellyache about how her bladder condition was exacerbated by being served at her home. THIS is YOUR opportunity to demonstrate how reasonable (or un-reasonable) you can be.

T. Matthew Phillips
Attorney-at-Law
(323) 314-6996

Shannon R. Wilson

From: Shannon R. Wilson
Sent: Thursday, June 17, 2021 8:28 AM
To: TMatthewPhillips
Cc: Mark A. Hutchison
Subject: RE: Service of Process

Mr. Phillips:

Your email below requesting that Ms. Korpak waive service does not comply with the Nevada or Federal Rules of Civil Procedure. Please read and comply with the applicable rule so that your request may be properly considered by Ms. Korpak.

Sincerely,

From: TMatthewPhillips <tmatthewphillips@aol.com>
Sent: Thursday, June 17, 2021 7:34 AM
To: Shannon R. Wilson <SWilson@hutchlegal.com>
Cc: Mark A. Hutchison <MHutchison@hutchlegal.com>
Subject: Service of Process

To: Wilson--

I have a new lawsuit for Korpak. Will you accept service of process?

If not, I'm going to direct the process server to tag Korpak at her house.

In order to keep the peace, I am calling on YOU, (Wilson), as a officer of the court, to act in the highest aspirational capacity and accept service of process for Korpak. If you accept service, she may take extra time to file a responsive pleading.

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Shannon R. Wilson

From: TMatthewPhillips <tmatthewphillips@aol.com>
Sent: Thursday, June 17, 2021 9:24 AM
To: Shannon R. Wilson
Subject: Re: Service of Process

I have been practicing law for 29 years -- more than twice as long as YOU -- and during that time, I have made dozens of requests for waiver, and not once has the opponent alleged that the request was not in compliance.

Naturally, you play "hide the ball" and fail to state how/why the request for waiver fails to comply. You make things so difficult -- on purpose. I can only assume your objection is based on me not sending a copy of the lawsuit and the fill-in-the-blanks form. Is THIS the nature of your objection?

T. Matthew Phillips
Attorney-at-Law
(323) 314-6996

-----Original Message-----

From: Shannon R. Wilson <SWilson@hutchlegal.com>
To: TMatthewPhillips <tmatthewphillips@aol.com>
Cc: Mark A. Hutchison <MHutchison@hutchlegal.com>
Sent: Thu, Jun 17, 2021 8:27 am
Subject: RE: Service of Process

Mr. Phillips:

Your email below requesting that Ms. Korpak waive service does not comply with the Nevada or Federal Rules of Civil Procedure. Please read and comply with the applicable rule so that your request may be properly considered by Ms. Korpak.

Sincerely,

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(323) 314-6996

Shannon R. Wilson
Partner



HUTCHISON & STEFFEN, PLLC
(702) 385-2500

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Shannon R. Wilson

From: Shannon R. Wilson
Sent: Thursday, June 17, 2021 9:39 AM
To: TMatthewPhillips
Subject: RE: Service of Process

Mr. Phillips,

It is precisely because you have been licensed to practice law in California for as long as you have that I expect you to read and follow the rules of the jurisdiction where you are acting pro se and not waste my time pointing them out to you.

Among other very specific things, the rules for requesting a waiver of service require you to give the defendant 30 days to return the waiver form that you are required to use. See NRCP Rule 4; FRCP 4.

Sincerely,

From: TMatthewPhillips <tmatthewphillips@aol.com>
Sent: Thursday, June 17, 2021 9:24 AM
To: Shannon R. Wilson <SWilson@hutchlegal.com>
Subject: Re: Service of Process

I have been practicing law for 29 years -- more than twice as long as YOU -- and during that time, I have made dozens of requests for waiver, and not once has the opponent alleged that the request was not in compliance.

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T. Matthew Phillips
Attorney-at-Law
(323) 314-6996

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If not, I'm going to direct the process server to tag Korpak at her house.

In order to keep the peace, I am calling on YOU, (Wilson), as a officer of the court, to act in the highest aspirational capacity and accept service of process for Korpak. If you accept service, she may take extra time to file a responsive pleading.

If you refuse, (which I anticipate), I shall have Korpak personally served at her house; however, this may be awkward for Donovan, which is why I ask YOU, (Wilson), to be professional and accept service of process for your client.

Note also, YOU (Wilson) and Hutch Legal are also defendants in this new lawsuit.

I asked Mark Hutchison to accept service, but his arrogance refuses to permit him to even communicate with me. Therefore, a process server will shortly be at YOUR office to tag YOU and Hutch Legal.

Knowing that Rule 11 forbids tactics that "needlessly increase litigation costs," it makes sense to effectuate service on all three defendants (Korpak, Wilson, and Hutch Legal) in one felled swoop.

When all's said, it makes sense -- to save money and avoid upset -- for you to do the right thing and accept service for Korpak.

The court will see this email, I am trying to show how reasonable I am.

If I am forced to serve Korpak at her home, I don't want to hear you and Korpak bellyache about how her bladder condition was exacerbated by being served at her home. THIS is YOUR opportunity to demonstrate how reasonable (or un-reasonable) you can be.

T. Matthew Phillips
Attorney-at-Law
(323) 314-6996

Shannon R. Wilson
Partner



HUTCHISON & STEFFEN, PLLC
(702) 385-2500

hutchlegal.com

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EXHIBIT PAGE ONLY

HUTCHISON & STEFFEN
A PROFESSIONAL LLC

EXHIBIT E

Shannon R. Wilson

From: Mark A. Hutchison
Sent: Wednesday, June 16, 2021 7:48 PM
To: Shannon R. Wilson
Subject: Fwd: RULE 11

Sent from my iPhone

Begin forwarded message:

From: TMatthewPhillips <tmatthewphillips@aol.com>
Date: June 16, 2021 at 5:41:47 PM PDT
To: "Mark A. Hutchison" <mhutchison@hutchlegal.com>
Subject: RULE 11
Reply-To: TMatthewPhillips <tmatthewphillips@aol.com>

Be advised, this email will be shown to the federal judge. All parties and counsel have a duty to NOT needlessly increase litigation costs, [Rule 11].

As soon as your served, we will immediately move the court for sanctions under Rule 11. You force me to needlessly increase litigation costs by hiring a process server.

A reasonable attorney would accept service of process by email and further accept the offer for more response time. I offered to serve you by email and to allow you more time to respond.

But you and Wilson are unreasonable. And your failure to acknowledge my emails proves this point.

Once served, we will oppose any motion for extension of the 21-day response period.

T. Matthew Phillips
Attorney-at-Law
(323) 314-6996

Shannon R. Wilson

From: Shannon R. Wilson
Sent: Thursday, June 17, 2021 8:37 AM
To: TMatthewPhillips
Cc: Mark A. Hutchison
Subject: RE: RULE 11

Mr. Phillips:

Your email to Mr. Hutchison dated June 16, 2021 at 5:41:47 PM PST requesting a waiver of service does not comply with the Nevada or Federal Rules of Civil Procedure. Upon receipt of a request for waiver that complies with the applicable rule, we will consider your waiver request.

In the meantime, the person in danger of sanctions arising under Rule 11 is you. You cannot have any cognizable claim against Hutchison & Steffen or any of its attorneys. Even without seeing the complaint, I strongly suspect a motion to dismiss coupled with a Rule 11 motion will be successful. We caution you to engage competent counsel who will, no doubt, advise you to dismiss any action against us or refrain from filing such action in the first place.

Sincerely,

From: Mark A. Hutchison <MHutchison@hutchlegal.com>
Sent: Wednesday, June 16, 2021 7:48 PM
To: Shannon R. Wilson <SWilson@hutchlegal.com>
Subject: Fwd: RULE 11

Begin forwarded message:

From: TMatthewPhillips <tmatthewphillips@aol.com>
Date: June 16, 2021 at 5:41:47 PM PDT
To: "Mark A. Hutchison" <mhutchison@hutchlegal.com>
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Once served, we will oppose any motion for extension of the 21-day response period.

Shannon R. Wilson

From: TMatthewPhillips <tmatthewphillips@aol.com>
Sent: Thursday, June 17, 2021 9:39 AM
To: Shannon R. Wilson
Subject: Re: RULE 11

Knock yourself out. File any motion you like. I have several more lawsuits planned against YOU, your client, Ochoa and Hutch Legal. (It's not like I have a son to raise...)

All of my lawsuits have merit -- and I will prevail -- and YOU will pay damages.

NOTE: I will NEVER stop litigating -- NEVER in a million years -- until I see my son.

T. Matthew Phillips
Attorney-at-Law
(323) 314-6996

-----Original Message-----

From: Shannon R. Wilson <SWilson@hutchlegal.com>
To: TMatthewPhillips <tmatthewphillips@aol.com>
Cc: Mark A. Hutchison <MHutchison@hutchlegal.com>
Sent: Thu, Jun 17, 2021 8:37 am
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Shannon R. Wilson
Partner



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