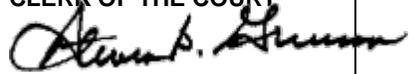


STORM LEGAL GROUP
3037 E. Warm Springs Rd. Ste. 300
Las Vegas, Nevada 89120-3759
Tel. (702) 765-0976 * Fax (702) 765-0981

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STORM LEGAL GROUP
ERICH N. STORM, ESQ.
Nevada State Bar No.:4480
estorm@keyinsco.com
3037 East Warm Springs Road, Suite 300
Las Vegas, Nevada 89120
Telephone: (702) 765-0976
Facsimile: (702) 765-0981
Attorneys for Defendant

Electronically Filed
2/4/2021 12:59 PM
Steven D. Grierson
CLERK OF THE COURT


Electronically Filed
Feb 09 2021 04:17 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

DISTRICT COURT
CLARK COUNTY, NEVADA

EDEL RAMIREZ-NAVARRETE, an individual,

Plaintiff,

vs.

HOLGA FLORES-REYES, an individual;
ANTHONY VERDON, an individual; DOE
DRIVERS I-V; DOE OWNERS I-V; ROE
EMPLOYERS I-V; and ROE CORPORATIONS
I-V, inclusive,

Defendant.

CASE NO.: A-19-800500-C
DEPT NO.: 27

NOTICE OF APPEAL

Notice is hereby given that ANTHONY VERDON AND HOLGA FLORES-REYES, defendants above-named, hereby appeal to the Supreme Court of Nevada from:

1. The Judgment on Arbitration Award entered in this action on December 28, 2020;
2. The District Court's Order granting Plaintiff's Motion to Strike Defendants' Request for Trial de Novo entered on December 10, 2020.

DATED this 4th day of February, 2021.

STORM LEGAL GROUP

By: /s/ Erich N. Storm
ERICH N. STORM, ESQ.
Nevada State Bar No.: 4480
3037 East Warm Springs Road, Suite 300
Las Vegas, Nevada 89120
Attorneys for Defendant

1 **CERTIFICATE OF SERVICE**

2 I **HEREBY CERTIFY** that on this 4th day of February, 2021, I served a true and
3 complete copy of the foregoing NOTICE OF APPEAL addressed to the parties below as follows:

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

6 [] via facsimile; and or

7 [] by hand delivery to parties listed below; and or

8 [X] by electronic service via ODYSSEY eFileNV through the District Court.

9
10 KIMBALL J. JONES, ESQ.

Nevada Bar No.: 12982

11 ROBERT N. EATON, ESQ.

Nevada Bar No.: 9547

12 BIGHORN LAW

2225 E. Flamingo Rd.

13 Building 2, Suite 300

14 Las Vegas, Nevada 89119

Phone: (702) 333-1111

15 Fax: (702) 507-0092

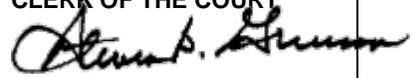
kimball@bighornlaw.com

16 roberte@bighornlaw.com

17 *Attorneys for Plaintiff*

18
19 */s/ Jeri L. Roth*

20 **STORM LEGAL GROUP**



1 ASTA
2 **STORM LEGAL GROUP**
3 ERICH N. STORM, ESQ.
4 Nevada State Bar No.:4480
5 estorm@keyinsco.com
6 3037 East Warm Springs Road, Suite 300
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 EDEL RAMIREZ-NAVARRETE, an individual,
14 Plaintiff,
15 vs.
16 HOLGA FLORES-REYES, an individual;
17 ANTHONY VERDON, an individual; DOE
18 DRIVERS I-V; DOE OWNERS I-V; ROE
19 EMPLOYERS I-V; and ROE CORPORATIONS
20 I-V, inclusive,
21 Defendant.

22 CASE NO.: A-19-800500-C
23 DEPT NO.: 27

24 **CASE APPEAL STATEMENT**

25 Defendants/Appellants, ANTHONY VERDON and HOLGA FLORES-REYES, through
26 their undersigned counsel, hereby submit the following Case Appeal Statement:

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

28 Anthony Verdon and Holga Flores-Reyes.

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

The Honorable Nancy L. Allf.

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

Appellant: Anthony Verdon.

Counsel for Appellant: Erich N. Storm, Esq., 3037 East Warm Springs Road,
Suite 300, Las Vegas, Nevada 89120.

STORM LEGAL GROUP
3037 E. Warm Springs Rd. Ste. 300
Las Vegas, Nevada 89120-3759
Tel. (702) 765-0976 * Fax (702) 765-0981

1 Appellant: Holga Flores-Reyes.

2 Counsel for Appellants: Erich N. Storm, Esq., 3037 East Warm Springs Road,
3 Suite 300, Las Vegas, Nevada 89120.

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

8 Respondent: Edel Ramirez-Navarrete.

9 Counsel for Respondent: Kimball Jones, Esq., and Robert N. Eaton, Esq., 2225 E.
10 Flamingo Rd., Building 2, Suite 300, Las Vegas, Nevada 89119.

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

15 No attorney is not licensed to practice law in Nevada.

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

18 Appellants were represented by retained counsel in the District Court.

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

21 Appellants are represented by retained counsel on appeal.

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

24 Appellants have not been granted leave to proceed in forma pauperis.

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

27 August 19, 2019.

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

This is a personal injury action between Plaintiff/Respondent and Defendants/Appellants. The parties submitted the matter to the court-annexed arbitration program in Clark County, Nevada, and an award was rendered in favor of Plaintiff/Respondent. Defendants/Appellants timely filed a Request for Trial de Novo. Subsequently, Plaintiff/Respondent filed a Motion to Strike Defendants' Request for Trial de Novo on the grounds that the Defendants did not participate in good faith. The District Court granted that motion by Order entered December 10, 2020. A judgment was entered against Defendants/Appellants on December 28, 2020; a notice of entry of "default judgement" was entered and served on January 4, 2021; and an amended notice of entry of judgment was entered and served on January 5, 2021.

Defendant/Appellant is appealing the Judgment and the Court's Order on the Motion to Strike.

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

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

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

The appeal does not involve child custody or visitation.

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13. If this is a civil case, indicate whether this appeal involves the possibility of settlement:

This appeal involves the possibility of settlement.

DATED this 4th day of February, 2021.

STORM LEGAL GROUP

By: /s/ Erich N. Storm
ERICH N. STORM, ESQ.
Nevada State Bar No.: 4480
3037 East Warm Springs Road, Suite 300
Las Vegas, Nevada 89120
Attorneys for Defendant

EIGHTH JUDICIAL DISTRICT COURT

CASE SUMMARY

CASE NO. A-19-800500-C

Edel Ramirez-Navarrete, Plaintiff(s)
vs.
Holga Flores-Reyes, Defendant(s)

§
§
§
§
§

Location: **Department 27**
 Judicial Officer: **Allf, Nancy**
 Filed on: **08/19/2019**
 Cross-Reference Case Number: **A800500**

CASE INFORMATION

Statistical Closures

12/28/2020 Judgment on Arbitration
 12/28/2020 Judgment on Arbitration

Case Type: **Negligence - Auto**

Case Status: **12/28/2020 Closed**

DATE

CASE ASSIGNMENT

Current Case Assignment

Case Number A-19-800500-C
 Court Department 27
 Date Assigned 08/19/2019
 Judicial Officer Allf, Nancy

PARTY INFORMATION

		<i>Lead Attorneys</i>
Plaintiff	Ramirez-Navarrete, Edel	Leavitt, Jacob G <i>Retained</i> 702-333-1111(W)
Defendant	Flores-Reyes, Holga	Purdy, Joseph J. <i>Retained</i> 702-765-0976(W)
	Verdon, Anthony	Purdy, Joseph J. <i>Retained</i> 702-765-0976(W)
Arbitrator	MacNabb, Lyn	

DATE

EVENTS & ORDERS OF THE COURT

INDEX

EVENTS

- 08/19/2019  **Complaint**
 Filed By: Plaintiff Ramirez-Navarrete, Edel
Complaint
- 08/19/2019  **Initial Appearance Fee Disclosure**
 Filed By: Plaintiff Ramirez-Navarrete, Edel
Initial Appearance Fee Disclosure
- 08/19/2019  **Summons Electronically Issued - Service Pending**
 Party: Plaintiff Ramirez-Navarrete, Edel
Summons
- 08/19/2019  **Summons Electronically Issued - Service Pending**
 Party: Plaintiff Ramirez-Navarrete, Edel
Summons

CASE SUMMARY

CASE NO. A-19-800500-C

- 09/10/2019  Affidavit of Service
Filed By: Plaintiff Ramirez-Navarrete, Edel
Affidavit of Service - Holga Flores-Reyes
- 09/20/2019  Affidavit of Service
Affidavit of Service - Anthony Verdon
- 10/14/2019  Three Day Notice of Intent to Default
Filed By: Plaintiff Ramirez-Navarrete, Edel
Three (3) Day Notice of Intent to Take Default
- 10/17/2019  Initial Appearance Fee Disclosure
Filed By: Defendant Flores-Reyes, Holga; Defendant Verdon, Anthony
Initial Appearance Fee Disclosure (NRS Chapter 19)
- 10/17/2019  Demand for Jury Trial
Filed By: Defendant Flores-Reyes, Holga; Defendant Verdon, Anthony
Demand for Trial by Jury
- 10/17/2019  Answer to Complaint
Filed by: Defendant Flores-Reyes, Holga; Defendant Verdon, Anthony
Defendants' Answer to Plaintiff's Complaint
- 12/02/2019  Appointment of Arbitrator
Appointment of Arbitrator
- 12/09/2019  Notice of Early Arbitration Conference
Filed By: Arbitrator MacNabb, Lyn
Notice of Early Arbitration Conference
- 12/17/2019  Notice to Appear for Arbitration Hearing
Filed by: Arbitrator MacNabb, Lyn
Notice to Appear
- 12/17/2019  Arbitration Discovery Order
Filed By: Arbitrator MacNabb, Lyn
Discovery Order
- 03/10/2020  Notice to Appear for Arbitration Hearing
Filed by: Arbitrator MacNabb, Lyn
Notice to Appear
- 05/27/2020  Notice of Change of Address
Filed By: Plaintiff Ramirez-Navarrete, Edel
Notice Of Change Of Firm Address
- 06/08/2020  Notice to Appear for Arbitration Hearing
Filed by: Arbitrator MacNabb, Lyn
Notice to Appear
- 09/02/2020  Request for Extension of Time and Order - Arbitrator
Request for Extension of Time and Order

CASE SUMMARY

CASE NO. A-19-800500-C

- 09/15/2020  Arbitration Award
Arbitration Award
- 09/15/2020  Arbitrators Bill for Fees and Costs
Filed By: Arbitrator MacNabb, Lyn
Arbitrator's Bill
- 09/21/2020  Application for Attorney's Fees, Costs and/or Interest
PLAINTIFF S APPLICATION FOR FEES AND COSTS
- 09/21/2020  Memorandum of Costs and Disbursements
PLAINTIFF S VERIFIED MEMORANDUM OF COSTS AND DISBURSEMENTS
- 10/02/2020  Arbitrator's Decision on Request for Fees/Costs/Interest
Filed by: Arbitrator MacNabb, Lyn
Decision on Request for Fees, Costs Interest
- 10/08/2020  Demand for Removal from the Short Trial Program
Filed By: Defendant Flores-Reyes, Holga
Demand for Removal from Short Trial Program
- 10/21/2020  Motion to Strike
Filed By: Plaintiff Ramirez-Navarrete, Edel
Plaintiffs Motion to Strike Defendant Request for Trial de Novo
- 10/21/2020  Clerk's Notice of Hearing
Notice of Hearing
- 11/04/2020  Opposition to Motion
Filed By: Defendant Flores-Reyes, Holga; Defendant Verdon, Anthony
Defendant's Opposition to Plaintiff's Motion to Strike Request for Trial De Novo
- 11/24/2020  Reply in Support
Filed By: Plaintiff Ramirez-Navarrete, Edel
Reply in Support of Plaintiff's Motion to Strike Defendants' Request for Trial de Novo
- 12/03/2020  Clerk's Notice of Nonconforming Document
Clerk's Notice of Nonconforming Document
- 12/10/2020  Order Granting Motion
Filed By: Plaintiff Ramirez-Navarrete, Edel
Order Order Granting Ramirez Naverette's Motion to Strike Request for Trial De Novo
- 12/15/2020  Notice To Prevailing Party Final Judgment May Be Entered
Notice to Prevailing Party to Enter Judgment on Arbitration Award
- 12/28/2020  Order to Statistically Close Case
Civil Order to Statistically Close Case
- 12/28/2020  Judgment on Arbitration Award
Filed By: Plaintiff Ramirez-Navarrete, Edel
Judgment on Arbitration Award

CASE SUMMARY

CASE NO. A-19-800500-C

- 01/04/2021  Notice of Entry of Judgment
Filed By: Plaintiff Ramirez-Navarrete, Edel
Notice of Entry of Default Judgment
- 01/05/2021  Notice of Entry of Judgment
Filed By: Plaintiff Ramirez-Navarrete, Edel
Amended Notice of Entry of Judgment
- 02/04/2021  Notice of Appeal
Filed By: Defendant Flores-Reyes, Holga; Defendant Verdon, Anthony
NOTICE OF APPEAL
- 02/04/2021  Case Appeal Statement
Filed By: Defendant Flores-Reyes, Holga; Defendant Verdon, Anthony
CASE APPEAL STATEMENT

DISPOSITIONS

- 12/28/2020 **Judgment Upon Arbitration Award** (Judicial Officer: Allf, Nancy)
Debtors: Holga Flores-Reyes (Defendant), Anthony Verdon (Defendant)
Creditors: Edel Ramirez-Navarrete (Plaintiff)
Judgment: 12/28/2020, Docketed: 12/29/2020
Total Judgment: 16,500.54

HEARINGS

- 09/10/2020 **Arbitration Hearing** (7:00 AM)
- 09/23/2020  **Minute Order** (3:00 AM) (Judicial Officer: Allf, Nancy)
Minute Order: Application for Attorney s Fees, Costs, and/or Interest SET 10/6/2020 Chambers Calendar
- MINUTES**
Minute Order - No Hearing Held; Minute Order: Application for Attorney s Fees, Costs, and/or Interest SET 10/6/2020 Chambers Calendar
Journal Entry Details:
COURT FINDS after review that an Arbitration Hearing took place on September 10, 2020. COURT FURTHER FINDS after review that an Arbitration Award was filed on September 15, 2020. COURT FURTHER FINDS after review that an Arbitrator s Bill for Fees and Costs was filed on September 15, 2020. COURT FURTHER FINDS after review that Plaintiffs filed an Application for Attorney s Fees, Costs, and/or Interest as well as a Memorandum of Costs and Disbursements on September 21, 2020. No hearing was requested. THEREFORE, COURT ORDERS for good cause appearing and after review the Motion for Fees is hereby scheduled on October 6, 2020 on Chambers calendar. CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Nicole McDevitt, to all registered parties for Odyssey File & Serve. /nm 9/23/2020.;
- SCHEDULED HEARINGS**
CANCELED Motion for Fees (10/06/2020 at 3:00 AM) (Judicial Officer: Allf, Nancy)
*Vacated - On in Error
Application for Attorney s Fees, Costs, and/or Interest*
- 10/06/2020 **CANCELED Motion for Fees** (3:00 AM) (Judicial Officer: Allf, Nancy)
*Vacated - On in Error
Application for Attorney s Fees, Costs, and/or Interest*
- 12/01/2020  **Minute Order** (3:00 AM) (Judicial Officer: Allf, Nancy)
Minute Order: BlueJeans Appearance
Minute Order - No Hearing Held; Minute Order: BlueJeans Appearance
Journal Entry Details:
Department 27 Formal Request to Appear Telephonically Re: Matter set on December 3, 2020

EIGHTH JUDICIAL DISTRICT COURT

CASE SUMMARY

CASE NO. A-19-800500-C

at 9:30 a.m. Please be advised that due to the COVID-19 pandemic, Department 27 will continue to conduct Court hearings REMOTELY using the Blue Jeans Video Conferencing system. You have the choice to appear either by phone or computer/video. Dial the following number: 1-408-419-1715 Meeting ID: 897 138 369 Meeting URL: <https://bluejeans.com/897138369> To connect by phone dial the number provided and enter the meeting ID followed by # To connect by computer if you do NOT have the app, copy the URL link into a web browser. Google Chrome is preferred but not required. Once you are on the BlueJeans website click on Join with Browser which is located on the bottom of the page. Follow the instructions and prompts given by BlueJeans. You may also download the Blue Jeans app and join the meeting by entering the meeting ID PLEASE NOTE the following protocol each participant will be required to follow: Place your phone on MUTE while waiting for your matter to be called. Do NOT place the call on hold since some phones may play wait/hold music. Please do NOT use speaker phone as it causes a loud echo/ringing noise. Please state your name each time you speak so that the court recorder can capture a clear record. Please be mindful of rustling papers, background noise, and coughing or loud breathing. Please be mindful of where your camera is pointing. We encourage you to visit the Bluejeans.com website to get familiar with the Blue Jeans phone/videoconferencing system before your hearing. If your hearing gets continued to a different date after you have already received this minute order please note a new minute order will issue with a different meeting ID since the ID number changes with each meeting/hearing. Please be patient if you call in and we are in the middle of oral argument from a previous case. Your case should be called shortly. Again, please keep your phone or computer mic on MUTE until your case is called. CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Nicole McDevitt, to all registered parties for Odyssey File & Serve. /nm 12/1/2020 ;

12/03/2020



Motion to Strike (9:30 AM) (Judicial Officer: Allf, Nancy)

Plaintiffs Motion to Strike Defendant Request for Trial de Novo
Granted;

Journal Entry Details:

All appearances made via the BlueJeans Videoconferencing software. Arguments by counsel regarding the merits of and opposition to the motion. Court stated its findings and ORDERED, Plaintiff's Motion to Strike Defendant Request for Trial de Novo GRANTED. Mr. Eaton to prepare the order and submit it to Ms. Johnson for approval.;

03/02/2021

Status Check: Settlement Documents (3:00 AM) (Judicial Officer: Allf, Nancy)

DATE

FINANCIAL INFORMATION

Defendant Verdon, Anthony	
Total Charges	284.00
Total Payments and Credits	284.00
Balance Due as of 2/8/2021	0.00
Plaintiff Ramirez-Navarrete, Edel	
Total Charges	270.00
Total Payments and Credits	270.00
Balance Due as of 2/8/2021	0.00
Defendant Verdon, Anthony	
Short Trial - Removal Balance as of 2/8/2021	1,000.00

DISTRICT COURT CIVIL COVER SHEET

County, Nevada

Case No. _____
(Assigned by Clerk's Office)

CASE NO. A-19-800500-C
Department 27

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

Plaintiff(s) (name/address/phone): <p style="text-align: center;">EDEL RAMIREZ-NAVARRETE</p>	Defendant(s) (name/address/phone): <p style="text-align: center;">HOLGA FLORES-REYES ANTHONY VERDON</p>
Attorney (name/address/phone): <p style="text-align: center;">Jacob G. Leavitt, Esq. Bighorn Law, 716 S. Jones Blvd., Las Vegas, NV 89107 Phone: 702-333-1111</p>	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 style="text-align: center;">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 (select case type and estate value)</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 style="text-align: center;">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 style="text-align: center;">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 style="text-align: center;">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><input type="checkbox"/> Writ of Prohibition</p> <p><input type="checkbox"/> Other Civil Writ</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 Judgment</p> <p><input type="checkbox"/> Other Civil Matters</p>

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

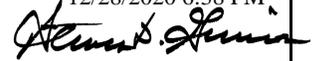
8/19/2019

Date

/s/Jacob Leavitt

Signature of initiating party or representative

See other side for family-related case filings.



CLERK OF THE COURT

1 **JUDG**
2 **KIMBALL JONES, ESQ.**
3 Nevada Bar No.: 12982
4 **ROBERT N. EATON, ESQ.**
5 Nevada Bar No.: 9547
6 **BIGHORN LAW**
7 2225 E. Flamingo Rd.
8 Building 2, Suite 300
9 Las Vegas, Nevada 89119
10 Phone: (702) 333-1111
11 Email: Roberte@bighornlaw.com
12 *Attorneys for Plaintiff*

DISTRICT COURT

CLARK COUNTY, NEVADA

10 EDEL RAMIREZ-NAVARETTE, and individual,
11
12 Plaintiff,

CASE NO.: A-19-800500-C
DEPT. NO.: XXVII

13 vs.

14 HOLGA FLORES-REYES, an individual;
15 ANTHONY VERDON, an individual; DOE
16 DRIVER I-V; DOE OWNERS I-V; ROE
17 EMPLOYER I-V; ROE CORPORATIONS I-V,
18 inclusive,

19 Defendants.

JUDGMENT ON ARBITRATION AWARD

20 This action came on for Arbitration hearing on September 10, 2020, before Arbitrator Lyn
21 MacNabb, Esq., presiding, and the issues having been duly heard, a decision having been rendered
22 and the prevailing party having been notified that judgment may be entered in accordance with the
23 award, and Defendants Request for Trial de Novo having been denied, the Court hereby enters
24 Judgment on the Arbitration Award and Ruling on Application for Fees, Costs and Interest, as
25 follows:

26 ///

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4 **IT IS HEREBY ORDERED AND ADJUDGED** that Plaintiff, EDEL RAMIREZ-
5 NAVARETTE, recover from the Defendants, HOLGA FLORES-REYES and ANTHONY
6 VERDON, jointly and severally, the sum of \$16,600.54, together with interest accruing at the legal
7 rate until fully paid.

8 DATED this 28 day of December, 2020.

Dated this 28th day of December, 2020

9
10 Nancy L Alf
DISTRICT JUDGE

11 Respectfully submitted by:

12 **BIGHORN LAW**

13 /s/ Robert N. Eaton, Esq.
14 **ROBERT N. EATON, ESQ.**
15 Nevada Bar No.: 9547
16 2225 E. Flamingo Rd.
17 Building 2, Suite 300
18 Las Vegas, Nevada 89119
19 *Attorneys for Plaintiff*

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21
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27
28
EDB 914 6B31 0E2F
Nancy Alf
District Court Judge

NB



1 **ARBA**
2 Lyn MacNabb
3 Nevada Bar No. 4323
4 7432 W. Sahara Avenue, Ste. 101
5 Las Vegas, Nevada 89117
6 (702) 636-0111
7 Arbitrator

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DISTRICT COURT

CLARK COUNTY, NEVADA

8 EDEL RAMIREZ-NAVARETTE,)
9 an individual,)
10)
11 Plaintiff,)
12 v.)
13)
14 HOLGA FLORES-REYES, an individual,)
15 ANTHONY VERDON an)
16 individual, DOES DRIVERS I-V, DOE)
17 OWNERT I-V; ROE EMPLOYERS I-V;)
18 and ROE CORPORATIONS I-V, inclusive,)
19)
20 Defendants.)
21)
22)
23)
24)
25)
26)
27)
28)

Case No: A-19-800500-C
Dept No: XXVII

ARBITRATION AWARD

TO: ROBERT EATON, Esq., attorney for Plaintiff; and
TO: PATRICE JOHNSON, Esq., attorney for Defendants.

The Arbitration hearing was held held on September 10, 2020. Present at the hearing were the above identified attorneys and the parties in this action. Having considered the testimony at the hearing, the briefs, pleadings and papers on file herein, I find in favor of the Plaintiff and against the Defendants Holga Flores-Reyes and Anthony Verdon and award total past damages in the amount of thirteen thousand five hundred dollars (\$13,500.00).

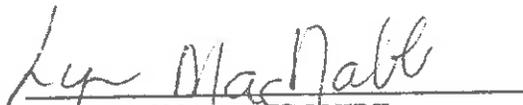
NOTICE

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Pursuant to Nevada Arbitration Rule 18A, you are hereby notified that you have thirty days from the date you are served with the Award within which to file a request for trial de novo with the Clerk of the Court and to serve the Commissioner and the other parties.

Dated this 15th day of September, 2020.

LAW OFFICES OF LYN MACNABB



LYN MACNABB, ESQUIRE
Nevada Bar Number 4323
7432 Sahara Avenue, Ste. 101
Las Vegas, Nevada 89117
Arbitrator

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of June, 2020, I electronically served a true and correct copy of the foregoing **ARBITRATION AWARD** to the attorneys addressed to the following:

JACOB LEAVITT, ESQ.
716 S. Jones Blvd.
Las Vegas, NV 89107
Attorney for Plaintiff

PATRICE JOHNSON, ESQ.
3057 E. Warm Springs Road #400
Las Vegas, NV 89120
Attorney for Defendant


An employee of Lyn MacNabb



1 **ABFCI**
2 Lyn MacNabb
3 Nevada Bar No. 4323
4 7432 W. Sahara Avenue, Ste. 101
5 Las Vegas, Nevada 89117
6 (702) 636-0111
7 Arbitrator

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 EDEL RAMIREZ-NAVARETTE,)
11 an individual,)
12)
13 Plaintiff,)
14 v.)
15 HOLGA FLORES-REYES, an individual,)
16 ANTHONY VERDON an)
17 individual, DOES DRIVERS I-V, DOE)
18 OWNERT I-V; ROE EMPLOYERS I-V;)
19 and ROE CORPORATIONS I-V, inclusive,)
20 Defendants.)

Case No: A-19-800500-C
Dept No: XXVII

RULING ON APPLICATION
FOR FEES, COSTS AND INTEREST

21 TO: ROBERT EATON, Esq., attorney for Plaintiff; and
22 TO: PATRICE JOHNSON, Esq., attorney for Defendants.

23 Plaintiff prevailed at the arbitration and timely applied for fees, costs and interest.
24 Having considered the application, and having received no opposition thereto, Plaintiff is
25 awarded costs in the reduced amount of one thousand one hundred forty-one dollars and
26 thirty-five cents (\$1,141.35) and interest in the amount of nine hundred fifty-six and
27 nineteen cents (\$959.19). Regrading the application for attorney's fees, the undersigned
28 finds that the analysis under Brunzell v. Golden Gate Nat. Bank, 85 Nev. 345, 455 P.2d 31
(1969) was satisfied. The factors addressed by that case, prerequisite to an award of

1 attorney's fees, were set forth in the moving points and authorities with specificity.

2 Attorney's fees ar thus awarded in the amount of one thousand dollars (\$1,000.00).

3 Dated this 2nd day of October, 2020.

4 LAW OFFICES OF LYN MACNABB

5
6 

7 LYN MACNABB, ESQUIRE
8 Nevada Bar Number 4323
9 7432 Sahara Avenue, Ste. 101
10 Las Vegas, Nevada 89117
11 *Arbitrator*

12 **CERTIFICATE OF SERVICE**

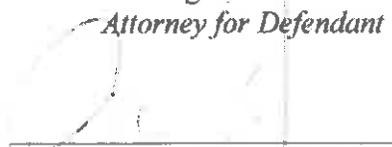
13 I HEREBY CERTIFY that on the 2nd day of October, 2020, I electronically served

14 a true and correct copy of the foregoing ***AWARD OF COSTS, INTEREST AND***

15 ***ATTORNEY'S FEES*** to the attorneys addressed to the following:

16 ROBERT EATON, ESQ.
17 716 S. Jones Blvd.
18 Las Vegas, NV 89107
19 *Attorney for Plaintiff*

20 PATRICE JOHNSON, ESQ.
21 3057 E. Warm Springs Road #400
22 Las Vegas, NV 89120
23 *Attorney for Defendant*

24
25
26
27
28

29 An employee of Lyn MacNabb

1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Edel Ramirez-Navarrete,
7 Plaintiff(s)

CASE NO: A-19-800500-C

8 vs.

DEPT. NO. Department 27

9 Holga Flores-Reyes,
10 Defendant(s)

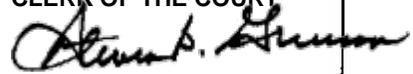
11 **AUTOMATED CERTIFICATE OF SERVICE**

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

15 Service Date: 12/28/2020

16 Katie Ader	katie@bighornlaw.com
17 Jacqueline R. Esq.	jacqueline@bighornlaw.com
18 Lyn MacNabb	lynmacnabb@yahoo.com
19 Robert Eaton	roberte@bighornlaw.com
20 Patrice Johnson	PJohnson@keyinsco.com
21 Ashley Gittings	agittings@keyinsco.com
22 Steven Haile	stevenh@bighornlaw.com

24
25
26
27
28



1 **NOE**
2 **KIMBALL J. JONES, ESQ.**
3 Nevada Bar No. 12982
4 **ROBERT N. EATON, ESQ.**
5 Nevada bar No. 9547
6 **BIGHORN LAW**
7 716 S. Jones Blvd.
8 Las Vegas, Nevada 89106
9 Phone: (702) 333-1111
10 Fax: (702) 507-0092
11 roberte@bighornlaw.com

12 *Attorneys for Plaintiff*

13 **DISTRICT COURT**

14 **CLARK COUNTY, NEVADA**

15 EDEL RAMIREZ-NAVARRETE, an individual,

16 Plaintiff,

17 v.

18 HOLGA FLORES-REYES, an individual;
19 ANTHONY VERDON, an individual; DOE
20 DRIVERS I-V; DOE OWNERS I-V; ROE
21 EMPLOYERS I-V; and ROE CORPORATIONS
22 I-V, inclusive,

23 Defendants.

CASE NO.: A-19-800500-C

DEPT. NO.: XXVII

24 **NOTICE OF ENTRY OF DEFAULT JUDGMENT**

25 TO: ALL DEFENDANTS AND THEIR ATTORENYS OF RECORD HEREIN:

26 PLEASE TAKE NOTICE that a Default Judgment was entered in the above-entitled matter on
27 December 28, 2020, a true and correct copy of which is attached hereto.

28 DATED this 4th day of January, 2021.

BIGHORN LAW

By: /s/ Robert N. Eaton
ROBERT N. EATON, ESQ.
Nevada Bar No. 9547
Attorneys for Plaintiff

1 CERTIFICATE OF SERVICE

2 Pursuant to NRCP 5, NEFCR 9 and EDCR 8.05, I hereby certify that I am an employee of
3 **BIGHORN LAW** and on the 4th day of January, 2021, I served the foregoing **NOTICE OF ENTRY OF**
4 **DEFAULT JUDGMENT** as follows:

- 5 Electronic Service – By serving a copy thereof through the Court’s electronic service
6 system; and/or
7 U.S. Mail—By depositing a true copy thereof in the U.S. mail, first class postage prepaid
8 and addressed as listed below; and/or
9 Facsimile—By facsimile transmission pursuant to EDCR 7.26 to the facsimile
10 number(s) shown below and in the confirmation sheet filed herewith. Consent to service
11 under NRCP 5(b)(2)(D) shall be assumed unless an objection to service by facsimile
12 transmission is made in writing and sent to the sender via facsimile within 24 hours of
13 receipt of this Certificate of Service.

11 Joseph Purdy, Esq.
12 PURDY ANDERSON STORM
13 3057 East Warm Springs Road, Suite 400
14 Las Vegas, Nevada 89120
15 Attorneys for Defendants

16 /s/ Steven C. Haile
17 An employee of **BIGHORN LAW**
18
19
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21
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1 **JUDG**
2 **KIMBALL JONES, ESQ.**
3 Nevada Bar No.: 12982
4 **ROBERT N. EATON, ESQ.**
5 Nevada Bar No.: 9547
6 **BIGHORN LAW**
7 2225 E. Flamingo Rd.
8 Building 2, Suite 300
9 Las Vegas, Nevada 89119
10 Phone: (702) 333-1111
11 Email: Roberte@bighornlaw.com
12 *Attorneys for Plaintiff*

DISTRICT COURT

CLARK COUNTY, NEVADA

10 EDEL RAMIREZ-NAVARETTE, and individual,
11
12 Plaintiff,

CASE NO.: A-19-800500-C
DEPT. NO.: XXVII

13 vs.

14 HOLGA FLORES-REYES, an individual;
15 ANTHONY VERDON, an individual; DOE
16 DRIVER I-V; DOE OWNERS I-V; ROE
17 EMPLOYER I-V; ROE CORPORATIONS I-V,
18 inclusive,

19 Defendants.

JUDGMENT ON ARBITRATION AWARD

20 This action came on for Arbitration hearing on September 10, 2020, before Arbitrator Lyn
21 MacNabb, Esq., presiding, and the issues having been duly heard, a decision having been rendered
22 and the prevailing party having been notified that judgment may be entered in accordance with the
23 award, and Defendants Request for Trial de Novo having been denied, the Court hereby enters
24 Judgment on the Arbitration Award and Ruling on Application for Fees, Costs and Interest, as
25 follows:

26 ///

27 ///

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4 **IT IS HEREBY ORDERED AND ADJUDGED** that Plaintiff, EDEL RAMIREZ-
5 NAVARETTE, recover from the Defendants, HOLGA FLORES-REYES and ANTHONY
6 VERDON, jointly and severally, the sum of \$16,600.54, together with interest accruing at the legal
7 rate until fully paid.

8 DATED this 28 day of December, 2020.

Dated this 28th day of December, 2020

9
10 Nancy L Alf
DISTRICT JUDGE

11 Respectfully submitted by:

EDB 914 6B31 0E2F
Nancy Alf
District Court Judge

NB

12 **BIGHORN LAW**

13 /s/ Robert N. Eaton, Esq.
14 **ROBERT N. EATON, ESQ.**
15 Nevada Bar No.: 9547
16 2225 E. Flamingo Rd.
Building 2, Suite 300
Las Vegas, Nevada 89119
17 *Attorneys for Plaintiff*



1 **ARBA**
2 Lyn MacNabb
3 Nevada Bar No. 4323
4 7432 W. Sahara Avenue, Ste. 101
5 Las Vegas, Nevada 89117
6 (702) 636-0111
7 Arbitrator

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 **EDEL RAMIREZ-NAVARETTE,**)
11 **an individual,**)
12 **Plaintiff,**)
13 **v.**)
14 **HOLGA FLORES-REYES, an individual,**)
15 **ANTHONY VERDON an**)
16 **individual, DOES DRIVERS I-V, DOE**)
17 **OWNERT I-V; ROE EMPLOYERS I-V;**)
18 **and ROE CORPORATIONS I-V, inclusive,**)
19 **Defendants.**)

Case No: A-19-800500-C
Dept No: XXVII

ARBITRATION AWARD

20 **TO: ROBERT EATON, Esq., attorney for Plaintiff; and**

21 **TO: PATRICE JOHNSON, Esq., attorney for Defendants.**

22 The Arbitration hearing was held held on September 10, 2020. Present at the
23 hearing were the above identified attorneys and the parties in this action. Having
24 considered the testimony at the hearing, the briefs, pleadings and papers on file herein, I
25 find in favor of the Plaintiff and against the Defendants Holga Flores-Reyes and Anthony
26 Verdon and award total past damages in the amount of thirteen thousand five hundred
27 dollars (\$13,500.00).

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NOTICE

Pursuant to Nevada Arbitration Rule 18A, you are hereby notified that you have thirty days from the date you are served with the Award within which to file a request for trial de novo with the Clerk of the Court and to serve the Commissioner and the other parties.

Dated this 15th day of September, 2020.

LAW OFFICES OF LYN MACNABB



LYN MACNABB, ESQUIRE
Nevada Bar Number 4323
7432 Sahara Avenue, Ste. 101
Las Vegas, Nevada 89117
Arbitrator

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of June, 2020, I electronically served a true and correct copy of the foregoing *ARBITRATION AWARD* to the attorneys addressed to the following:

JACOB LEAVITT, ESQ.
716 S. Jones Blvd.
Las Vegas, NV 89107
Attorney for Plaintiff

PATRICE JOHNSON, ESQ.
3057 E. Warm Springs Road #400
Las Vegas, NV 89120
-Attorney for Defendant



An employee of Lyn MacNabb



1 ABFCI
Lyn MacNabb
2 Nevada Bar No. 4323
7432 W. Sahara Avenue, Ste. 101
3 Las Vegas, Nevada 89117
4 (702) 636-0111
Arbitrator

6 DISTRICT COURT

7 CLARK COUNTY, NEVADA

8
9 EDEL RAMIREZ-NAVARETTE,)
an individual,)
10)
Plaintiff,)
11)
v.)
12)
13 HOLGA FLORES-REYES, an individual,)
ANTHONY VERDON an)
14 individual, DOES DRIVERS I-V, DOE)
15 OWNERT I-V; ROE EMPLOYERS I-V;)
and ROE CORPORATIONS I-V, inclusive,)
16)
Defendants.)
17)

Case No: A-19-800500-C
Dept No: XXVII

RULING ON APPLICATION
FOR FEES, COSTS AND INTEREST

18 TO: ROBERT EATON, Esq., attorney for Plaintiff; and

19 TO: PATRICE JOHNSON, Esq., attorney for Defendants.

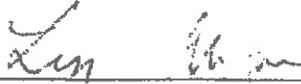
20
21 Plaintiff prevailed at the arbitration and timely applied for fees, costs and interest.
22 Having considered the application, and having received no opposition thereto, Plaintiff is
23 awarded costs in the reduced amount of one thousand one hundred forty-one dollars and
24 thirty-five cents (\$1,141.35) and interest in the amount of nine hundred fifty-six and
25 nineteen cents (\$959.19). Regarding the application for attorney's fees, the undersigned
26 finds that the analysis under Brunzell v. Golden Gate Nat. Bank, 85 Nev. 345, 455 P.2d 31
27 (1969) was satisfied. The factors addressed by that case, prerequisite to an award of
28

1 attorney's fees, were set forth in the moving points and authorities with specificity.

2 Attorney's fees are thus awarded in the amount of one thousand dollars (\$1,000.00).

3 Dated this 2nd day of October, 2020.

4 LAW OFFICES OF LYN MACNABB

5 

6
7 LYN MACNABB, ESQUIRE
8 Nevada Bar Number 4323
9 7432 Sahara Avenue, Ste. 101
10 Las Vegas, Nevada 89117
11 *Arbitrator*

12 CERTIFICATE OF SERVICE

13 I HEREBY CERTIFY that on the 2nd day of October, 2020, I electronically served

14 a true and correct copy of the foregoing ***AWARD OF COSTS, INTEREST AND***

15 ***ATTORNEY'S FEES*** to the attorneys addressed to the following:

16 ROBERT EATON, ESQ.
17 716 S. Jones Blvd.
18 Las Vegas, NV 89107
Attorney for Plaintiff

PATRICE JOHNSON, ESQ.
3057 E. Warm Springs Road #400
Las Vegas, NV 89120
Attorney for Defendant

19
20 
21 An employee of Lyn MacNabb

1 CSERV

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA

4
5
6 Edel Ramirez-Navarrete,
7 Plaintiff(s)

CASE NO: A-19-800500-C

8 vs.

DEPT. NO. Department 27

9 Holga Flores-Reyes,
10 Defendant(s)

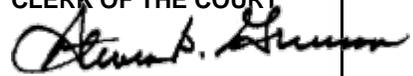
11 **AUTOMATED CERTIFICATE OF SERVICE**

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

15 Service Date: 12/28/2020

16 Katie Ader	katie@bighornlaw.com
17 Jacqueline R. Esq.	jacqueline@bighornlaw.com
18 Lyn MacNabb	lynmacnabb@yahoo.com
19 Robert Eaton	roberte@bighornlaw.com
20 Patrice Johnson	PJohnson@keyinsco.com
21 Ashley Gittings	agittings@keyinsco.com
22 Steven Haile	stevenh@bighornlaw.com

24
25
26
27
28



1 **NOE**
2 **KIMBALL J. JONES, ESQ.**
3 Nevada Bar No. 12982
4 **ROBERT N. EATON, ESQ.**
5 Nevada bar No. 9547
6 **BIGHORN LAW**
7 716 S. Jones Blvd.
8 Las Vegas, Nevada 89106
9 Phone: (702) 333-1111
10 Fax: (702) 507-0092
11 roberte@bighornlaw.com

12 *Attorneys for Plaintiff*

13 **DISTRICT COURT**

14 **CLARK COUNTY, NEVADA**

15 EDEL RAMIREZ-NAVARRETE, an individual,

16 Plaintiff,

17 v.

18 HOLGA FLORES-REYES, an individual;
19 ANTHONY VERDON, an individual; DOE
20 DRIVERS I-V; DOE OWNERS I-V; ROE
21 EMPLOYERS I-V; and ROE CORPORATIONS
22 I-V, inclusive,

23 Defendants.

CASE NO.: A-19-800500-C

DEPT. NO.: XXVII

24 **AMENDED NOTICE OF ENTRY OF JUDGMENT**

25 TO: ALL DEFENDANTS AND THEIR ATTORNEYS OF RECORD HEREIN:

26 PLEASE TAKE NOTICE that a Judgment was entered in the above-entitled matter on December
27 28, 2020, a true and correct copy of which is attached hereto.

28 DATED this 5th day of January, 2021.

BIGHORN LAW

By: /s/ Robert N. Eaton

ROBERT N. EATON, ESQ.

Nevada Bar No. 9547

Attorneys for Plaintiff

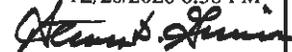
1 CERTIFICATE OF SERVICE

2 Pursuant to NRCP 5, NEFCR 9 and EDCR 8.05, I hereby certify that I am an employee of
3 **BIGHORN LAW** and on the 5th day of January, 2021, I served the foregoing **NOTICE OF ENTRY OF**
4 **DEFAULT JUDGMENT** as follows:

- 5 Electronic Service – By serving a copy thereof through the Court’s electronic service
6 system; and/or
7 U.S. Mail—By depositing a true copy thereof in the U.S. mail, first class postage prepaid
8 and addressed as listed below; and/or
9 Facsimile—By facsimile transmission pursuant to EDCR 7.26 to the facsimile
10 number(s) shown below and in the confirmation sheet filed herewith. Consent to service
under NRCP 5(b)(2)(D) shall be assumed unless an objection to service by facsimile
transmission is made in writing and sent to the sender via facsimile within 24 hours of
receipt of this Certificate of Service.

11 Joseph Purdy, Esq.
12 PURDY ANDERSON STORM
13 3057 East Warm Springs Road, Suite 400
14 Las Vegas, Nevada 89120
Attorneys for Defendants

15 /s/ Steven C. Haile
16 An employee of **BIGHORN LAW**



CLERK OF THE COURT

1 **JUDG**
2 **KIMBALL JONES, ESQ.**
3 Nevada Bar No.: 12982
4 **ROBERT N. EATON, ESQ.**
5 Nevada Bar No.: 9547
6 **BIGHORN LAW**
7 2225 E. Flamingo Rd.
8 Building 2, Suite 300
9 Las Vegas, Nevada 89119
10 Phone: (702) 333-1111
11 Email: Roberte@bighornlaw.com
12 *Attorneys for Plaintiff*

DISTRICT COURT

CLARK COUNTY, NEVADA

13 EDEL RAMIREZ-NAVARETTE, and individual,
14
15 Plaintiff,

CASE NO.: A-19-800500-C
DEPT. NO.: XXVII

16 vs.

17 HOLGA FLORES-REYES, an individual;
18 ANTHONY VERDON, an individual; DOE
19 DRIVER I-V; DOE OWNERS I-V; ROE
20 EMPLOYER I-V; ROE CORPORATIONS I-V,
21 inclusive,

22 Defendants.

JUDGMENT ON ARBITRATION AWARD

23 This action came on for Arbitration hearing on September 10, 2020, before Arbitrator Lyn
24 MacNabb, Esq., presiding, and the issues having been duly heard, a decision having been rendered
25 and the prevailing party having been notified that judgment may be entered in accordance with the
26 award, and Defendants Request for Trial de Novo having been denied, the Court hereby enters
27 Judgment on the Arbitration Award and Ruling on Application for Fees, Costs and Interest, as
28 follows:

///

///

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2
3
4 **IT IS HEREBY ORDERED AND ADJUDGED** that Plaintiff, EDEL RAMIREZ-
5 NAVARETTE, recover from the Defendants, HOLGA FLORES-REYES and ANTHONY
6 VERDON, jointly and severally, the sum of \$16,600.54, together with interest accruing at the legal
7 rate until fully paid.

8 DATED this 28 day of December, 2020.

Dated this 28th day of December, 2020

9
10 Nancy L Alf
DISTRICT JUDGE

11 Respectfully submitted by:

12 **BIGHORN LAW**

13 /s/ Robert N. Eaton, Esq.
ROBERT N. EATON, ESQ.

14 Nevada Bar No.: 9547
15 2225 E. Flamingo Rd.
16 Building 2, Suite 300
Las Vegas, Nevada 89119
Attorneys for Plaintiff

EDB 914 6B31 0E2F
Nancy Alf
District Court Judge

NB



1 **ARBA**
2 Lyn MacNabb
3 Nevada Bar No. 4323
4 7432 W. Sahara Avenue, Ste. 101
5 Las Vegas, Nevada 89117
6 (702) 636-0111
7 Arbitrator

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 **EDEL RAMIREZ-NAVARETTE,**)
11 **an individual,**)
12)
13 **Plaintiff,**)
14 **v.**)
15 **HOLGA FLORES-REYES, an individual,**)
16 **ANTHONY VERDON an**)
17 **individual, DOES DRIVERS I-V, DOE**)
18 **OWNERT I-V; ROE EMPLOYERS I-V;**)
19 **and ROE CORPORATIONS I-V, inclusive,**)
20 **Defendants.**)

Case No: A-19-800500-C
Dept No: XXVII

ARBITRATION AWARD

21 **TO: ROBERT EATON, Esq., attorney for Plaintiff; and**
22 **TO: PATRICE JOHNSON, Esq., attorney for Defendants.**

23 **The Arbitration hearing was held held on September 10, 2020. Present at the**
24 **hearing were the above identified attorneys and the parties in this action. Having**
25 **considered the testimony at the hearing, the briefs, pleadings and papers on file herein, I**
26 **find in favor of the Plaintiff and against the Defendants Holga Flores-Reyes and Anthony**
27 **Verdon and award total past damages in the amount of thirteen thousand five hundred**
28 **dollars (\$13,500.00).**

NOTICE

Pursuant to Nevada Arbitration Rule 18A, you are hereby notified that you have thirty days from the date you are served with the Award within which to file a request for trial de novo with the Clerk of the Court and to serve the Commissioner and the other parties.

Dated this 15th day of September, 2020.

LAW OFFICES OF LYN MACNABB



LYN MACNABB, ESQUIRE
Nevada Bar Number 4323
7432 Sahara Avenue, Ste. 101
Las Vegas, Nevada 89117
Arbitrator

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of June, 2020, I electronically served a true and correct copy of the foregoing **ARBITRATION AWARD** to the attorneys addressed to the following:

JACOB LEAVITT, ESQ.
716 S. Jones Blvd.
Las Vegas, NV 89107
Attorney for Plaintiff

PATRICE JOHNSON, ESQ.
3057 E. Warm Springs Road #400
Las Vegas, NV 89120
Attorney for Defendant



An employee of Lyn MacNabb



1 ABFCI
2 Lyn MacNabb
3 Nevada Bar No. 4323
4 7432 W. Sahara Avenue, Ste. 101
5 Las Vegas, Nevada 89117
6 (702) 636-0111
7 Arbitrator

8 DISTRICT COURT

9 CLARK COUNTY, NEVADA

10 EDEL RAMIREZ-NAVARETTE,)
11 an individual,)

12 Plaintiff,)

13 v.)

14 HOLGA FLORES-REYES, an individual,)
15 ANTHONY VERDON an)
16 individual, DOES DRIVERS I-V, DOE)
17 OWNERT I-V; ROE EMPLOYERS I-V;)
18 and ROE CORPORATIONS I-V, inclusive,)

19 Defendants.)

Case No: A-19-800500-C
Dept No: XXVII

RULING ON APPLICATION
FOR FEES, COSTS AND INTEREST

20 TO: ROBERT EATON, Esq., attorney for Plaintiff; and

21 TO: PATRICE JOHNSON, Esq., attorney for Defendants.

22 Plaintiff prevailed at the arbitration and timely applied for fees, costs and interest.

23 Having considered the application, and having received no opposition thereto, Plaintiff is
24 awarded costs in the reduced amount of one thousand one hundred forty-one dollars and
25 thirty-five cents (\$1,141.35) and interest in the amount of nine hundred fifty-six and
26 nineteen cents (\$959.19). Regarding the application for attorney's fees, the undersigned
27 finds that the analysis under Brunzell v. Golden Gate Nat. Bank, 85 Nev. 345, 455 P.2d 31
28 (1969) was satisfied. The factors addressed by that case, prerequisite to an award of

1 attorney's fees, were set forth in the moving points and authorities with specificity.

2 Attorney's fees are thus awarded in the amount of one thousand dollars (\$1,000.00).

3 Dated this 2nd day of October, 2020.

4 LAW OFFICES OF LYN MACNABB

5
6 

7 LYN MACNABB, ESQUIRE
8 Nevada Bar Number 4323
9 7432 Sahara Avenue, Ste. 101
10 Las Vegas, Nevada 89117
11 *Arbitrator*

12 CERTIFICATE OF SERVICE

13 I HEREBY CERTIFY that on the 2nd day of October, 2020, I electronically served
14 a true and correct copy of the foregoing ***AWARD OF COSTS, INTEREST AND***

15 ***ATTORNEY'S FEES*** to the attorneys addressed to the following:

16 ROBERT EATON, ESQ.
17 716 S. Jones Blvd.
18 Las Vegas, NV 89107
Attorney for Plaintiff

PATRICE JOHNSON, ESQ.
3057 E. Warm Springs Road #400
Las Vegas, NV 89120
Attorney for Defendant

19
20 
21 _____
22 An employee of Lyn MacNabb
23
24
25
26
27
28

1 CSERV

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Edel Ramirez-Navarrete,
7 Plaintiff(s)

CASE NO: A-19-800500-C

8 vs.

DEPT. NO. Department 27

9 Holga Flores-Reyes,
10 Defendant(s)

11 **AUTOMATED CERTIFICATE OF SERVICE**

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

15 Service Date: 12/28/2020

16 Katie Ader	katie@bighornlaw.com
17 Jacqueline R. Esq.	jacqueline@bighornlaw.com
18 Lyn MacNabb	lynmacnabb@yahoo.com
19 Robert Eaton	roberte@bighornlaw.com
20 Patrice Johnson	PJohnson@keyinsco.com
21 Ashley Gittings	agittings@keyinsco.com
22 Steven Haile	stevenh@bighornlaw.com

24

25

26

27

28

1 **ORDR**
2 ROBERT N. EATON, ESQ.
3 Nevada Bar No.: 9547
4 **BIGHORN LAW**
5 2225 E. Flamingo Rd.
6 Building 2, Suite 300
7 Las Vegas, Nevada 89119
8 Phone: (702) 333-1111
9 Email: Roberte@bighornlaw.com
10 *Attorneys for Plaintiff*

7 **DISTRICT COURT**

8 **CLARK COUNTY, NEVADA**

9 EDEL RAMIREZ-NAVARETTE, and individual,

10 Plaintiff,

11 vs.

12 HOLGA FLORES-REYES, an individual;
13 ANTHONY VERDON, an individual; DOE
14 DRIVER I-V; DOE OWNERS I-V; ROE
15 EMPLOYER I-V; ROE CORPORATIONS I-V,
16 inclusive,

16 Defendants.

CASE NO.: A-19-800500-C
DEPT. NO.: XXVII

17 **ORDER GRANTING PLAINTIFF RAMIREZ NAVARETTE'S MOTION TO STRIKE**
18 **DEFENDANTS' REQUEST FOR TRIAL DE NOVO**

19 On December 3rd, 2020, the above captioned case came before this Court, the Honorable Nancy
20 Allf presiding, regarding Plaintiff Edel Ramirez-Navarette's Motion to Strike Defendants' Request for
21 Trial De Novo. The Court, having reviewed the Pleadings submitted by the parties, and upon hearing and
22 considering the arguments from Plaintiff's Counsel Robert N. Eaton and Defendant's counsel Patrice
23 Johnson, the Court orders as follows:

24 **ORDER**

25 **THE COURT FINDS** That defendants HOLGA FLORES-REYES and ANTHONY VERDON
26 failed to meaningfully participate in good faith during the arbitration proceedings pursuant to NAR 22(a).
27
28

1 **THE COURT FURTHER FINDS** Defendants did not meaningfully participate in the arbitration
2 process for the following reasons:

3 1) Defendants did not respond to Plaintiff’s Discovery despite having 93 days to do so.
4 Defendants thus admitted that Flores-Reyes was the insured driver of her car that rear-ended Plaintiff’s
5 vehicle; that Defendant’s negligence caused the accident; that the accident was the proximate cause of
6 Plaintiff’s injuries; that the collision caused property damage to Plaintiff’s vehicle; that Defendant Flores-
7 Reyes attempted to flee from the accident scene; and that Plaintiff’s medical expenses were related to the
8 accident, as well as reasonable and customary for our area.

9
10 2) Defendant Holga Flores-Reyes failed to respond to Plaintiff’s Interrogatories.

11 4) Defense counsel had not had any communication with either Defendant prior to filing an
12 Answer to the Complaint, or during the entire arbitration process.

13 5) Defendants did not attend the arbitration hearing.

14 6) Defense counsel did not dispute liability or damages in addition to the lack of meaningful
15 participation by Defendants.

16 10) Defendants failed to oppose Plaintiff’s Application for Fees and Costs.

17 Based upon the findings of the Court, the Court ORDERS that Plaintiff’s Motion to Strike
18 Request for Trial De Novo is GRANTED, and that the ADR Commissioner is instructed to issue Notice
19

20
21 ///

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1 that the JUDGEMENT on the ARBITRATION AWARD with fees and costs as awarded on October 5,
2 2020 can now be entered.

3 **IT IS SO ORDERED** this 10 day of December, 2020.

4
5 Dated this 10th day of December, 2020

6 Nancy L Alf
DISTRICT COURT JUDGE

NB

7 *Reviewed by:*

8 *Storm Legal Group*
9 */s/ Patrice Johnson*
10 *Patrice Johnson, Esq.*
11 *Nevada Bar NO. 12283*
12 *3057 East Warm Springs Road, Suite 400*
13 *Las Vegas, Nevada 89120*
14 *Attorney for Defendants*
15 *pjohnson@keyinsco.com*

E6A 3D2 B16E E2BF
Nancy Alf
District Court Judge

12 Respectfully submitted this 9th day of December, 2020.

13 **BIGHORN LAW**

14 By: /s/ Robert N. Eaton
15 **ROBERT N. EATON, ESQ.**
16 Nevada Bar No.: 9547
17 2225 E. Flamingo Rd.;
18 Building 2, Suite 300
19 Las Vegas, Nevada 89119
20 *Attorneys for Plaintiff*



Search mail

Compose

Mail

Inbox 1,874

Starred

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Sent

Drafts 65

Nilly: I'm not at the offic...

More

Meet

New meeting

My meetings

Order Striking De Novo in Edel Ramirez-Navarrete vs. Holga Flores-Reyes -- A-19-800500-C Inbox x

Robert Eaton

Dear Patrice and Ms. Gittings: I had forwarded a proposed order your

Patrice Johnson

to Ashley, me

Hi Robert,

You may add my electronic signature. Also, (10) is after (6), you

Thanks,

Patrice S. Johnson, Esq.

Storm Legal Group
3057 East Warm Springs Road, Suite 400
Las Vegas, NV 89120
702-265-0976

Robert Eaton <roberte@bighornlaw.com>

to Debora, Patrice

Dear Patrice:

THank you for catching that. I will fix the numbering, add your signature,

Sincerely,

Robert Eaton, Esq.

Spring Mountain Office
4089 Spring Mountain Road
Las Vegas, Nevada 89102
(702) 333-1111 Ext. 644

1 CSERV

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA

4
5
6 Edel Ramirez-Navarrete,
7 Plaintiff(s)

CASE NO: A-19-800500-C

8 vs.

DEPT. NO. Department 27

9 Holga Flores-Reyes,
10 Defendant(s)

11 **AUTOMATED CERTIFICATE OF SERVICE**

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

15 Service Date: 12/10/2020

16 Katie Ader

katie@bighornlaw.com

17 Jacqueline R. Esq.

jacqueline@bighornlaw.com

18 Lyn MacNabb

lynmacnabb@yahoo.com

19 Robert Eaton

roberte@bighornlaw.com

20 Patrice Johnson

PJohnson@keyinsco.com

21 Ashley Gittings

agittings@keyinsco.com

22 Debora Ponce

debora@bighornlaw.com

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CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Nicole McDevitt, to all registered parties for Odyssey File & Serve. /nm 9/23/2020.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Negligence - Auto

COURT MINUTES

December 01, 2020

A-19-800500-C Edel Ramirez-Navarrete, Plaintiff(s)
vs.
Holga Flores-Reyes, Defendant(s)

**December 01, 2020 3:00 AM Minute Order Minute Order:
BlueJeans
Appearance**

HEARD BY: Allf, Nancy

COURTROOM: No Location

COURT CLERK: Nicole McDevitt

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- Department 27 Formal Request to Appear Telephonically

Re: Matter set on December 3, 2020 at 9:30 a.m.

Please be advised that due to the COVID-19 pandemic, Department 27 will continue to conduct Court hearings REMOTELY using the Blue Jeans Video Conferencing system. You have the choice to appear either by phone or computer/video.

Dial the following number: 1-408-419-1715

Meeting ID: 897 138 369

Meeting URL: <https://bluejeans.com/897138369>

To connect by phone dial the number provided and enter the meeting ID followed by #

To connect by computer if you do NOT have the app, copy the URL link into a web browser. Google Chrome is preferred but not required. Once you are on the BlueJeans website click on Join with Browser which is located on the bottom of the page. Follow the instructions and prompts given by BlueJeans.

You may also download the Blue Jeans app and join the meeting by entering the meeting ID

PLEASE NOTE the following protocol each participant will be required to follow:

Place your phone on MUTE while waiting for your matter to be called.

Do NOT place the call on hold since some phones may play wait/hold music.

Please do NOT use speaker phone as it causes a loud echo/ringing noise.

Please state your name each time you speak so that the court recorder can capture a clear record.

Please be mindful of rustling papers, background noise, and coughing or loud breathing.

Please be mindful of where your camera is pointing.

We encourage you to visit the Bluejeans.com website to get familiar with the Blue Jeans phone/videoconferencing system before your hearing.

If your hearing gets continued to a different date after you have already received this minute order please note a new minute order will issue with a different meeting ID since the ID number changes with each meeting/hearing.

Please be patient if you call in and we are in the middle of oral argument from a previous case. Your case should be called shortly. Again, please keep your phone or computer mic on MUTE until your case is called.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Nicole McDevitt, to all registered parties for Odyssey File & Serve. /nm 12/1/2020

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Negligence - Auto

COURT MINUTES

December 03, 2020

A-19-800500-C Edel Ramirez-Navarrete, Plaintiff(s)
vs.
Holga Flores-Reyes, Defendant(s)

December 03, 2020 9:30 AM Motion to Strike

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

COURT CLERK: Nicole McDevitt

RECORDER: Brynn White

REPORTER:

PARTIES

PRESENT: Eaton, Robert N. Attorney
 Johnson, Patrice S Attorney

JOURNAL ENTRIES

- All appearances made via the BlueJeans Videoconferencing software.

Arguments by counsel regarding the merits of and opposition to the motion. Court stated its findings and ORDERED, Plaintiff's Motion to Strike Defendant Request for Trial de Novo GRANTED. Mr. Eaton to prepare the order and submit it to Ms. Johnson for approval.



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

ERICH N. STORM, SQ.
3037 E. WARM SPRINGS RD., SUITE 300
LAS VEGAS, NV 89120

DATE: February 8, 2021
CASE: A-19-800500-C

RE CASE: EDEL RAMIREZ-NAVARRETE vs. HOLGA FLORES-REYES; ANTHONY VERDON

NOTICE OF APPEAL FILED: February 4, 2021

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 District Court.*
- Case Appeal Statement
 - NRAP 3 (a)(1), Form 2
- Order
- Notice of Entry of Order *re: for Order Filed December 10, 2020*

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; JUDGMENT ON ARBITRATION AWARD; NOTICE OF ENTRY OF DEFAULT JUDGMENT; AMENDED NOTICE OF ENTRY OF JUDGMENT; ORDER GRANTING PLAINTIFF RAMIREZ NAVARETTE'S MOTION TO STRIKE REQUEST FOR TRIAL DE NOVO; DISTRICT COURT MINUTES; NOTICE OF DEFICIENCY

EDEL RAMIREZ-NAVARRETE,

Plaintiff(s),

vs.

HOLGA FLORES-REYES; ANTHONY
VERDON,

Defendant(s),

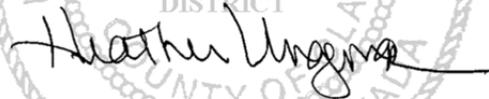
Case No: A-19-800500-C

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 8 day of February 2021.

Steven D. Grierson, Clerk of the Court



Heather Ungermann, Deputy Clerk

