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Mar 19 2021 03:32 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

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

Appellant,

vs.

EDEL RAMIREZ-NAVARRETE, an  
individual

Respondent.

Supreme Court Case No. 82455

**AMENDED DOCKETING STATEMENT  
CIVIL APPEALS**

1. Judicial District: Eighth Department 27

County: Clark Judge: The Honorable Nancy Allf

**2. Attorney filing this docketing statement:**

**Please take notice that Erich N. Storm, Esq. is no longer with Storm Legal Group, now known as DESERT RIDGE LEGAL GROUP, and will therefore no longer be counsel on this case or for the Appellants, HOLGA FLORES-REYES and ANTHONY VERDON. Ryan M. Venci is a member of counsel for Desert Ridge Legal Group and will be filing this docketing statement:**

Ryan M. Venci, Esq. (702) 765-0976

3037 East Warm Springs Road, Suite 300, Las Vegas, Nevada 89120

1 Client(s): Holga Flores-Reyes and Anthony Verdon

2 **3. Attorney(s) representing respondent(s):**

3 Kimball Jones, Esq., and Robert N. Eaton, Esq. (702) 333-1111

4 2225 E. Flamingo Rd., Building 2, Suite 300, Las Vegas, Nevada 89119

5 Client(s): Edel Ramirez-Navarrete

6 **4. Nature of disposition below (check all that apply):**

7 ☐ Judgement after bench trial

☐ Dismissal:

8 ☐ Judgment after jury verdict

☐ Lack of jurisdiction

9 ☐ Summary judgment

☐ Failure to state a claim

10 ☐ Default judgment

☐ Failure to prosecute

11 ☐ Grant/Denial of NRCP 60(b) relief

☐ Other (specify)

12 ☐ Grand/Denial of injection

☐ Divorce decree

13 ☐ Grant/Denial of declaratory relief

☐ Original ☐ Modification

14 ☐ Review of agency determination

x Other disposition (specify): Court granted Respondent's Motion to Strike Request for Trial De Novo and entered a Judgment on the Arbitration Award.

16 **5. Does this appeal raise issues concerning any of the following?**

17 ☐ Child custody

18 ☐ Venue

19 ☐ Termination of parental rights

20 No.

21 **6. Pending and prior proceedings in this court.** List the case name and docket number of  
22 all appeals or original proceedings presently or previously before this court which are related to  
23 this appeal.

24 None.

25 **7. Pending and prior proceedings in other courts.** List the case name, number and court of  
26 all pending and prior proceedings in other courts which are related to this appeal (e.g. bankruptcy,  
27 consolidation or bifurcated proceedings) and their dates of disposition.

28 None.

1 **8. Nature of the action.** Briefly describe the nature of the action and the result below:

2 This is a personal injury action between Plaintiff/Respondent and Defendant/Appellant.  
3 The parties submitted the matter to the court-annexed arbitration program in Clark County,  
4 Nevada, and an award was rendered in favor of Plaintiff/Respondent. Defendant/Appellant timely  
5 filed a Request for Trial de Novo. Subsequently, Plaintiff/Respondent filed a Motion to Strike  
6 Defendant's Request for Trial de Novo. The Court granted that said motion. A judgment was then  
7 entered against Defendant/Appellant on December 28, 2020.

8 **9. Issues on appeal.** State concisely the principal issue(s) in this appeal (attach separate  
9 sheets as necessary):

10 Whether the District Court properly struck Defendant/Appellant's Request for Trial de  
11 Novo and entered judgment in favor of Plaintiff/Respondent on the Arbitration Award.

12 **10. Pending proceedings in this court raising the same or similar issues.** If you are aware  
13 of any proceedings presently pending before this court which raised the same or similar issues  
14 raised in this appeal, list the case name and docket numbers and identify the same or similar issue  
15 raised:

16 Supreme Court Case No. 82267, Veronica Jazmin Castillo, Appellant vs. Armando Pons-  
17 Diaz, Respondent.

18 **11. Constitutional issues.** If this appeal challenges the constitutionality of a statute, and the  
19 state, any state agency, or any officer or employee thereof is not a party to this appeal, have you  
20 notified the clerk of court and the attorney general in accordance with NRAP 44 and NRS30.130

21 x N/A

22 ☐ Yes

23 ☐ No

24 If not, explain: Not applicable

25 **12. Other issues.** Does this appeal involve any of the following issues?

26 ☐ Reversal of well-settled Nevada precedent (identify the case(s))

27 ☐ An issue arising under the United States and/or Nevada Constitutions

28 ☐ A substantial issue of first impression

☐ An issue of public policy

☐ An issue where en banc consideration is necessary to maintain uniformity of this court's decisions

☐ A ballot question.

If so, explain: Not applicable.

**13. Assignment to the Court of Appeals or retention in the Supreme Court.** Briefly set forth whether the matter is presumptively retained by the Supreme Court or assigned to the Court of Appeals under NRAP 17, and cite the subparagraphs of the Rule under which the matter falls. If appellant believes that the Supreme Court should retain the case despite its presumptive assignment to the Court of Appeals, identify the specific issue(s) or circumstance(s) that warrant retaining the case, and include an explanation of their importance or significance:

Appellant submits that this appeal is presumptively assigned to the Court of Appeals under NRAP 17(b)(5).

**14. Trial.** If this action proceed to trial, how many days did the trial last? Not applicable.

Was it a bench or jury trial? Not applicable.

**15. Judicial Disqualification.** Do you intend to file a motion to disqualify or have a justice recuse him/herself from participation in this appeal? If so, which Justice?

No.

#### **TIMELINESS OF NOTICE OF APPEAL**

**16. Date of entry of written judgment or order appealed from**

The Order on the Court's ruling on Plaintiff's Motion to Strike Defendant's Request for Trial De Novo was filed on December 10, 2020 and the Judgment on Arbitration Award was filed on December 28, 2020.

**17. Date of written notice of entry of judgment or order was served**

January 4, 2021 – Notice of Entry of Default Judgment

Was service by:

☐ Delivery

☐ Mail/electronic service

January 5, 2021 – Amended Notice of Entry of Judgment

Was service by:

☐ Delivery

☒ Mail/electronic service

**18. If the time for filing the notice of appeal was tolled by a post-judgment motion (NRCp 50(b), 52(b) or 59)**

(a) Specify the type of motion, the date and method of service of the motion, and the date of filing

Not applicable

**19. Date notice of appeal filed**

February 4, 2021

**20. Specify the statute or rule governing the time limit for filing the notice of appeal, e.g. NRAP 4(a) or other**

NRAP4(A)(1).

**SUBSTANTIVE APPEALABILITY**

**21. Specify the statute or other authority granting this court jurisdiction to review the judgment or order appealed from:**

(a)

☒ NRAP 3(A)(b)(1)

☐ NRS 38.205

☐ NRAP 3(A)(b)(2)

☐ NRS 233B.150

☐ NRAP (3)(A)(b)(3)

☐ NRS 703.376

☐ Other (specify)

(b) Explain how each authority provides a basis for appeal from judgement or order

~~The order granting the Motion to Strike and Judgment on Arbitration Award: NRAP 3(A)(b)(1).~~

**22. List all parties involved in the action or consolidated actions in the district court.**

(a) Parties:

Plaintiff: Edel Ramirez-Navarrete

Defendant: Holga Flores-Reyes and Anthony Verdon

(b) If all parties in the district court are not parties to this appeal, explain in detail why those parties are not involved in this appeal, *e.g.*, formally dismissed, not served, or other:

Not applicable.

**23. Give a brief description (3 to 5 words) of each party's separate claims, counterclaims, cross-claims or third-party claims and the date of formal disposition of each claim.**

Negligence, December 10, 2020 and December 28, 2020.

**24. Did the judgment or order appealed from adjudicate ALL the claims alleged below and the rights and liabilities of ALL the parties to the action or consolidated actions below?**

☒ Yes

☐ No

**25. If you answered "No" to question 24, complete the following:**

Not applicable.

**26. If you answered "No" to any part of question 25, explain the basis for seeking appellate review (*e.g.*, order is independently appealable under NRAP 3(A)(b):**

Not applicable.

**27. Attach filed stamped copies of the following documents:**

- The latest-filed complaint, counterclaims, cross-claims an third-party claims.

Please see attached Exhibit A.

- Any tolling motion(s) and order(s) resolving tolling motion(s).

None.

- Orders of NRCP 41(a) dismissals formally resolving each claim, counterclaims, cross claims and/or third-party claims asserted in the action or consolidated actions below

None.

- Any other challenged on appeal

None.

...

**DESERT RIDGE LEGAL GROUP**

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Las Vegas NV 89120-3759

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1		• Notices of entry for each attached order
2		None.
3	...	
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**VERIFICATION**

I declare under penalty of perjury that I have read this docketing statement, that the information provided in this docketing statement is true and complete to the best of my knowledge, information and belief, and that I have attached all required documents to this docketing statement

Holga Flores-Reyes and Anthony Verdon  
Name of Appellant

Ryan M. Venci, Esq.  
Name of counsel of record

March 19, 2021  
Date

/s/ Ryan M. Venci  
Signature of counsel of record

State of Nevada, County of Clark  
State and country where signed

**CERTIFICATE OF SERVICE**

I certify that on the 19th day of March, 2021, I served a copy of this completed docketing statement upon all counsel of record:

☐ By personally serving it upon him/her, or

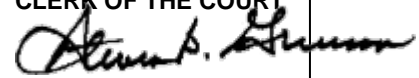
☒ By mailing it by first class with sufficient postage paid to the following address(es):

KIMBALL J. JONES, ESQ.  
Nevada Bar No.: 12982  
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*Attorneys for Respondent*

/s/ Jeri L. Roth  
Employee, DESERT RIDGE LEGAL GROUP



# EXHIBIT A



1 **COMP**

2 **JACOB G. LEAVITT, ESQ.**

3 Nevada Bar No.: 12608

4 **RICHARD FONBUENA, ESQ.**

5 Nevada Bar No.: 15041

6 **BIGHORN LAW**

7 716 South Jones Boulevard

8 Las Vegas, Nevada 89107

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10 [jacobl@bighornlaw.com](mailto:jacobl@bighornlaw.com)

11 [richard@bighornlaw.com](mailto:richard@bighornlaw.com)

12 *Attorneys for Plaintiff*

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

13 **DISTRICT COURT**

14 **CLARK COUNTY, NEVADA**

15 EDEL RAMIREZ-NAVARRETE, an individual,

16 Plaintiff,

17 v.

CASE NO.:

DEPT. NO.:

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.

24 **COMPLAINT**

25 COMES NOW, Plaintiff, EDEL RAMIREZ-NAVARRETE, an individual, by and through his  
attorneys, KIMBALL JONES, ESQ., JACOB G. LEAVITT, ESQ., and RICHARD FONBUENA,  
ESQ., of BIGHORN LAW, and for his causes of action against Defendants, and each of them, complains  
and alleges as follows:

1. At all times mentioned herein, PLAINTIFF EDEL RAMIREZ-NAVARRETE (hereinafter  
"PLAINTIFF") was and is a resident of the County of Clark, State of Nevada.

///  
///

2. Upon information and belief and at all times mentioned herein, DEFENDANTS HOLGA FLORES-REYES (hereinafter DEFENDANT "FLORES-REYES"), ANTHONY VERDON (hereinafter DEFENDANT "VERDON") and DOE DRIVERS I-V and/or DOE OWNERS I-II, were and are residents of the State of Nevada.
3. Upon information and belief, at all times relevant to this action, DEFENDANTS FLORES-REYES and/or DOE DRIVERS III-V, were and are residents of the County of Clark, State of Nevada, were operating a motor vehicle upon the streets and highways of Clark County, Nevada, and directly and proximately caused an automobile collision; a vehicle owned by DEFENDANTS VERDON, DOE DRIVERS III-V, DOE OWNERS III-V, ROE EMPLOYERS I-II and/or ROE CORPORATIONS I-II, at the time of the subject traffic collision more fully described hereinbelow.
4. Upon information and belief, at all times relevant to this action, the DEFENDANTS VERDON, DOE OWNERS III-V, ROE EMPLOYERS III-V and/or ROE CORPORATIONS III-V, were and are conducting business within the County of Clark, State of Nevada and/or were or was a resident(s) of the County of Clark, State of Nevada.
5. Upon information and belief, at all times mentioned herein, DEFENDANT FLORES-REYES and/or DEFENDANT DOE DRIVERS I-II was/were the drivers of the subject at-fault vehicle owned by DEFENDANTS VERDON and/or DOE OWNERS I-II and/or ROE EMPLOYERS I-II, and/or was/were acting in the course and scope of his/her employment with DEFENDANTS VERDON, ROE EMPLOYERS III-V and/or ROE CORPORATIONS I-V at the time of the traffic accident described herein.
6. At all times relevant to this action, DEFENDANTS VERDON, DOE OWNERS III-V and/or ROE EMPLOYERS I-V and/or ROE CORPORATIONS I-II, was/were an entity doing business in the County of Clark, State of Nevada, and was/were directing the course and scope

1 of the actions of the other DEFENDANTS, and each, some or all of them, at the time of the  
2 automobile collision herein described.

3 7. At all times relevant to this action, DEFENDANTS VERDON, ROE EMPLOYERS I-V  
4 and/or ROE CORPORATIONS III-V were employing the other DEFENDANTS, and each,  
5 some or all of them, and he/she/it was/were acting in the course and scope of said employment  
6 at all times relevant to the automobile collision described hereinbelow.

7 8. The true names and capacities, whether individual, corporate, partnership, associate or otherwise,  
8 of DEFENDANTS, including DEFENDANTS VERDON, DOE OWNERS I through V,  
9 ROE EMPLOYERS I through V and/or ROE CORPORATIONS I through V, are unknown  
10 to PLAINTIFF, who therefore sues said DEFENDANTS by such fictitious names.  
11 PLAINTIFF is informed and believes and thereupon alleges that each of the said  
12 DEFENDANTS designated herein as DOE and ROE were/are responsible in some manner for  
13 the events and happenings referred to herein and directly and proximately caused damages to the  
14 PLAINTIFF as herein alleged, and that PLAINTIFF will seek leave of this Court to amend this  
15 Complaint to insert the true names and capacities of DOE and ROE Defendants when the same  
16 have been ascertained, and to join such DEFENDANTS in this action.

17 **FIRST CAUSE OF ACTION**  
18 **(Negligence)**

19 9. PLAINTIFF incorporates by this reference all of the allegations of paragraphs 1 through 8,  
20 hereinabove, as though completely set forth herein.

21 10. That on or about February 7, 2019, PLAINTIFF RAMIREZ, operating his 2008 BMW, was  
22 proceeding slowing within the Planet Hollywood Las Vegas Resort & Casino parking structure,  
23 located at 3667 Las Vegas Boulevard South, Las Vegas, Nevada 89109 when, suddenly and  
24 without warning, he was rear-ended by DEFENDANTS FLORES-REYES and/or DOE  
25 DRIVERS I-V, who was/were operating a vehicle owned, in whole or in part, by

1 DEFENDANTS VERDON, DOE OWNERS I-V and/or ROE CORPORATIONS I-V  
2 and/or ROE EMPLOYEES I-V, inclusive, causing property damage and injuries and damages  
3 to the PLAINTIFF, as further described and otherwise set forth hereinbelow.

4 11. That following the subject rear-end collision, DEFENDANT FLORES-REYES attempted to  
5 flee, requiring that PLAINTIFF follow her up the said parking structure, until said  
6 DEFENDANT reached the 10<sup>th</sup> floor, where said DEFENDANT finally stopped and exchanged  
7 information with the PLAINTIFF.

8 12. DEFENDANTS, including DEFENDANTS VERDON, DOE OWNERS I-V and/or ROE  
9 CORPORATIONS I-V and/or ROE EMPLOYERS I-V, had a duty to all members of general  
10 public, including the PLAINTIFF herein, to hire competent and safe drivers for their vehicle(s)  
11 and to provide those drivers with reasonable and safe guidelines and training for the operation  
12 of their said vehicle(s).

13 13. Nevertheless, DEFENDANTS, including DEFENDANTS VERDON, DOE OWNERS I-V  
14 and/or ROE CORPORATIONS I-V and/or ROE EMPLOYERS I-V, hired negligent, reckless,  
15 and careless drivers, including DEFENDANT FLORES-REYES and/or DEFENDANT DOE  
16 DRIVERS I-V, and failed to provide reasonable or safe guidelines and/or training for the  
17 operation of her/their/its vehicle.

18 14. At the time of the collision herein complained of, and immediately prior thereto,  
19 DEFENDANTS, and each or all of them, in breaching duties owed to the PLAINTIFF herein,  
20 was/were negligent and careless, inter alia, in the following particulars:

21 A. In failing to keep DEFENDANTS' vehicle under proper control;

22 B. In operating DEFENDANTS' vehicle without due caution for the rights of the  
23 PLAINTIFF herein;

24 C. In failing to keep a proper lookout;  
25

1 D. In failing to use due care in the operation of DEFENDANTS' vehicle;

2 E. Negligent Entrustment;

3 F. Vicarious liability through the operation of NRS 41.440;

4 G. Respondeat superior;

5 H. The DEFENDANTS, and each of them, violated certain state and local statutes, rules,  
6 regulations, codes and ordinances, and PLAINTIFF will pray leave of Court to insert  
7 the exact citations at the time of trial.

8 15. By reason of the premises, and as a direct and proximate result of the aforesaid negligence  
9 and carelessness of DEFENDANTS, and each of them, the PLAINTIFF suffered physical injury and  
10 was otherwise injured in and about his neck, back, legs, arms, organs and systems, and was otherwise  
11 injured and caused to suffer great pain of body and mind, and all or some of the same is chronic and may  
12 be permanent and disabling, all to PLAINTIFF's damage in an amount not yet fully ascertained but  
13 nevertheless in excess of Fifteen Thousand Dollars (\$15,000.00).

14 16. By reason of the premises, and as a direct and proximate result of the aforesaid negligence  
15 and carelessness of the DEFENDANTS, and each of them, PLAINTIFF has been caused to expend  
16 monies for medical and miscellaneous expenses, and may in the future be caused to expend additional  
17 monies for medical expenses and miscellaneous expenses incidental thereto, in a sum not yet presently  
18 ascertainable, and leave of Court will be requested to include said additional damages when the same  
19 have been fully ascertained.

20 17. Prior to the injuries complained of herein, PLAINTIFF was able-bodied, capable of being  
21 gainfully employed and/or active, and capable of engaging in all other activities for which PLAINTIFF  
22 was otherwise suited. By reason of the premises, and as a direct and proximate result of the negligence  
23 of the said DEFENDANTS, and each of them, PLAINTIFF was caused to be disabled and limited and  
24 restricted in his occupation and activities, which caused him a loss of wages in an as yet unascertainable  
25

1 amount and/or a diminution of PLAINTIFF's earning capacity and a future loss of wages, all to  
2 PLAINTIFF's damage in a sum not yet presently ascertainable, the allegations of which PLAINTIFF  
3 prays leave of Court to insert herein when the same has be fully determined.

4 18. PLAINTIFF has been required to retain attorneys to prosecute this action, and is  
5 therefore entitled to recover his attorneys' fees, case costs and prejudgment interest.

6 **SECOND CAUSE OF ACTION**  
7 **(Negligent Entrustment)**

8 19. PLAINTIFF incorporates by this reference all of the allegations of paragraphs 1 through  
9 18, hereinabove, as though completely set forth herein.

10 20 That at the time of the collision herein complained of, and immediately prior thereto,  
11 DEFENDANTS VERDON, DOE OWNERS I-V and/or ROE CORPORATIONS I-V and/or ROE  
12 EMPLOYERS I-V, owned the vehicle being driven at the time by DEFENDANT FLORES-REYES  
13 and/or DEFENDANT DOE DRIVERS I-V, and negligently entrusted said vehicle to DEFENDANT  
14 FLORES-REYES and/or DEFENDANT DOE DRIVERS I-V, who carelessly operated, managed and  
15 maintained said vehicle by causing the subject traffic collision, which directly and proximately resulted in  
16 injuries and damages to the PLAINTIFF, as described hereinabove and below.

17 21. That at the time of the collision herein complained of, and immediately prior thereto,  
18 DEFENDANT FLORES-REYES and/or DEFENDANT DOE DRIVERS I-V was/were acting and  
19 conducting herself/himself as an employee, agent, manager, representative and/or permissive driver of  
20 DEFENDANTS VERDON, DOE OWNERS I-V and/or ROE CORPORATIONS I-V and/or ROE  
21 EMPLOYERS I-V, and therefore, DEFENDANTS VERDON, DOE OWNERS I-V and/or ROE  
22 CORPORATIONS I-V and/or ROE EMPLOYERS I-V is/are fully responsible and liable for all of the  
23 PLAINTIFF's injuries and damages caused by DEFENDANT FLORES-REYES's and/or  
24 DEFENDANT DOE DRIVERS I-V's negligence, as more fully described hereinabove.  
25

1           22.     That at all times alleged herein, DEFENDANTS VERDON, DOE OWNERS I-V  
2 and/or ROE CORPORATIONS I-V and/or ROE EMPLOYERS I-V was/were negligent in failing to  
3 adequately hire, train, supervise and retain its employee, agent and/or representative, which directly and  
4 proximately resulted in the automobile collision and thus PLAINTIFF's injuries and damages, as more  
5 fully described herein.

6           23.     At the time of the traffic collision herein complained of, and immediately prior thereto,  
7 DEFENDANTS, and each of them, in breaching duties owed to PLAINTIFF, were negligent and  
8 careless, inter alia, in the following particulars:

9                   A. In failing to keep DEFENDANTS' vehicle under proper control;

10                  B. In operating DEFENDANTS' vehicle without due caution for the rights of the  
11                   PLAINTIFF;

12                  C. In failing to keep a proper lookout;

13                  D. In failing to use due care in the operation of DEFENDANTS' vehicle;

14                  E. Negligent Entrustment;

15                  F. Vicarious liability through the operation of NRS 41.440;

16                  G. Respondeat superior;

17                  H. The DEFENDANTS, and each of them, violated certain state and local statutes, rules,  
18                  regulations, codes and ordinances, and PLAINTIFF will pray leave of Court to insert  
19                  the exact citations at the time of trial.

20           24.     By reason of the premises, and as a direct and proximate result of the aforesaid negligence  
21 and carelessness of DEFENDANTS, and each of them, the PLAINTIFF suffered physical injuries and  
22 was otherwise damaged in and about his neck, back, legs, arms, organs and systems, and was otherwise  
23 injured and caused to suffer great pain of body and mind, and all or some of the same is or may be  
24  
25



chronic and permanent and disabling, all to PLAINTIFF's damage, in an amount not yet fully ascertained but nevertheless in excess of Fifteen Thousand Dollars (\$15,000.00).

25. By reason of the premises, and as a direct and proximate result of the aforesaid negligence and carelessness of the DEFENDANTS, and each of them, PLAINTIFF has been caused to expend monies for medical and miscellaneous expenses, and may in the future be caused to expend additional monies for medical expenses and miscellaneous expenses incidental thereto, in a sum not yet presently ascertainable, and PLAINTIFF will pray leave of Court to include said additional damages if/when the same have been fully ascertained.

26. Prior to the injuries complained of herein, PLAINTIFF was able-bodied, capable of being gainfully employed and/or otherwise capable of engaging in all other activities for which PLAINTIFF was otherwise suited. By reason of the premises, and as a direct and proximate result of the negligence of the said DEFENDANTS, and each of them, PLAINTIFF was caused to be disabled and limited and restricted in his occupation and activities, which caused and/or may have caused PLAINTIFF a loss of wages and/or a diminution of PLAINTIFF's earning capacity, and future wage loss, all to PLAINTIFF's damage in an amount not yet ascertainable, the allegations of which PLAINTIFF prays leave of Court to insert herein when the same shall be fully determined.

27. PLAINTIFF has been required to retain attorneys to prosecute this action, and he is therefore entitled to recover his attorneys' fees, case costs and prejudgment interest.

#### **PRAYER FOR RELIEF**

**WHEREFORE**, PLAINTIFF RAMIREZ expressly reserves the right herein to include all items of damage, and prays for judgment against each and all of the DEFENDANTS herein, jointly and severally, as follows:

- 1.General damages for PLAINTIFF in an amount in excess of Fifteen Thousand Dollars (\$15,000.00);

