

Electronically Filed  
Feb 23 2021 11:12 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

1 **NOAS**  
2 **RESNICK & LOUIS, P.C.**  
3 PRESCOTT JONES  
4 Nevada Bar No. 11617  
5 [pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
6 MYRALEIGH A. ALBERTO  
7 Nevada Bar No. 14340  
8 [malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)  
9 8925 W. Russell Road, Suite 220  
10 Las Vegas, Nevada 89148  
11 Telephone: (702) 997-3800  
12 Facsimile: (702) 997-3800  
13 *Attorneys for Plaintiff,*  
14 *Ton Vinh Lee*

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

13 TON VINH LEE,  
14  
15 Plaintiff,  
16 v.

16 INGRID PATIN, an individual, and PATIN  
17 LAW GROUP, PLLC, a Nevada Professional  
18 LLC,  
19 Defendants.

CASE NO.: A-15-723134-C

DEPT: 26

**NOTICE OF APPEAL**

21 Notice is hereby given that PLAINTIFF TON VINH LEE, by and through his attorneys  
22 of record, PRESCOTT T. JONES, ESQ. and MYRALEIGH A. ALBERTO, ESQ. of the law  
23 firm of RESNICK & LOUIS, P.C., hereby appeals to the Supreme Court of Nevada from the  
24 Order Granting Defendant Ingrid Patin's Motion for Summary Judgment and Defendant Patin  
25 Law Group's Joinder, entered in this action on the 30<sup>th</sup> day of October, 2020, and attached as  
26 Exhibit A.

1 On November 24, 2020, Plaintiff filed his Motion to Alter/Amend Judgment Pursuant to  
2 NRCP 59(e). On January 21, 2021, the Court denied Plaintiff's Motion to Alter/Amend  
3 Judgment Pursuant to NRCP 59(e). See Exhibit B.

4 DATED this 18th day of February, 2021.

5 **RESNICK & LOUIS, P.C.**

6 */s/ Myraleigh A. Alberto*

7  
8 \_\_\_\_\_  
9 PRESCOTT JONES  
10 Nevada Bar No. 11617  
11 MYRALEIGH A. ALBERTO  
12 Nevada Bar No. 14340  
13 8925 W. Russell Road, Suite 220  
14 Las Vegas, NV 89148  
15 *Attorneys for Plaintiff,*  
16 *Ton Vinh Lee*  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that service of the foregoing **NOTICE OF APPEAL** was served this 18<sup>th</sup> day of February, 2021, by:

☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada, addressed as set forth below.

☐ **BY FACSIMILE:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document.

☐ **BY PERSONAL SERVICE:** by causing personal delivery by an employee of Resnick & Louis, P.C. of the document(s) listed above to the person(s) at the address(es) set forth below.

☒ **BY ELECTRONIC SERVICE:** by transmitting via the Court's electronic filing services the document(s) listed above to the Counsel set forth on the service list on this date pursuant to EDCR Rule 7.26(c)(4).

Christian M. Morris, Esq.  
**NETTLES MORRIS**  
1389 Galleria Dr., Suite 200  
Henderson, NV 89014  
*Attorney for Defendant Ingrid Patin*

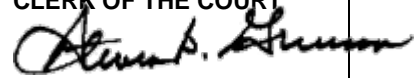
Kerry J. Doyle, Esq.  
**DOYLE LAW GROUP**  
7375 S. Pecos Rd., #101  
Las Vegas, NV 89120  
*Attorney for Defendant Patin Law Group, PLLC*

*/s/ Susan Carbone*

---

An Employee of Resnick & Louis, P.C.

## **EXHIBIT “A”**



NEOJ  
CHRISTIAN M. MORRIS, ESQ.  
Nevada Bar No. 11218  
NETTLES | MORRIS  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Telephone: (702) 434-8282  
Facsimile: (702) 434-1488  
[christian@nettlesmorris.com](mailto:christian@nettlesmorris.com)  
*Attorney for Defendant, Ingrid Patin*

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

TON VINH LEE, an individual,  
  
Plaintiff,

v.

INGRID PATIN, an individual, and PATIN  
LAW GROUP, PLLC, a Nevada  
Professional LLC,  
  
Defendants.

CASE NO.: A-15-723134-C  
DEPT NO.: 26

**NOTICE OF ENTRY OF ORDER  
GRANTING DEFENDANT PATIN'S  
MOTION FOR SUMMARY  
JUDGMENT AND PATIN LAW  
GROUP'S JOINDER**

TO: ALL PARTIES; and  
TO: THEIR RESPECTIVE ATTORNEYS:

**PLEASE TAKE NOTICE** that an Order granting Defendant Patin's Motion for Summary Judgment and Patin Law Group's Joinder was duly entered in the above-entitled matter on the 28<sup>th</sup> day of October, 2020, a true and correct copy of said Order is attached hereto.

DATED this 30<sup>th</sup> day of October, 2020.

NETTLES | MORRIS



CHRISTIAN M. MORRIS, ESQ.  
Nevada Bar No. 011218  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
*Attorney for Defendant, Ingrid Patin*

700 121 8080 / 700 121 1488 (fax)

**CERTIFICATE OF SERVICE**

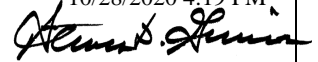
Pursuant to NEFCR 9, NRCP 5(b) and EDCR 7.26, I hereby certify that on this 30th day of October, 2020, a true and correct copy of the foregoing **NOTICE OF ENTRY OF ORDER GRANTING DEFENDANT PATIN'S MOTION FOR SUMMARY JUDGMENT AND PATIN LAW GROUP'S JOINDER** was served to the following parties by electronic transmission through the Odyssey eFileNV system and/or by depositing in the US Mail, postage prepaid, addressed as follows:

Kerry Doyle	kdoyle@doylelawgroupnv.com
Mikayla Hurtt	admin@doylelawgroupnv.com
Coreene Drose	cdrose@rlattorneys.com
Ingrid Patin	ingrid@patinlaw.com
Lisa Bell	lbell@rlattorneys.com
Prescott Jones	pjones@rlattorneys.com
Susan Carbone	scarbone@rlattorneys.com
Jessica Humphrey	jhumphrey@rlattorneys.com



---

An Employee of NETTLES | MORRIS

  
CLERK OF THE COURT

**NETTLES | MORRIS**  
1389 Galleria Drive Suite 200  
Henderson, NV 89014  
(702) 434-8282 / (702) 434-1488 (fax)

**ORDR**

BRIAN D. NETTLES, ESQ.  
Nevada Bar No. 7462  
CHRISTIAN M. MORRIS, ESQ.  
Nevada Bar No. 11218  
VICTORIA R. ALLEN, ESQ.  
Nevada Bar No. 15005  
NETTLES | MORRIS  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Telephone: (702) 434-8282  
Facsimile: (702) 434-1488  
[brian@nettlesmorris.com](mailto:brian@nettlesmorris.com)  
[christian@nettlesmorris.com](mailto:christian@nettlesmorris.com)  
[victoria@nettlesmorris.com](mailto:victoria@nettlesmorris.com)  
*Attorneys for Plaintiff*

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

TON VINH LEE, an individual;  
  
Plaintiff,  
  
vs.

CASE NO.: A-15-723134-C  
DEPT NO.: XXVI

INGRID PATIN, an individual, and PATIN  
LAW GROUP, PLLC, a Nevada  
Professional LLC,  
  
Defendants.

**ORDER GRANTING DEFENDANT  
PATIN'S MOTION FOR SUMMARY  
JUDGMENT AND PATIN LAW  
GROUP'S JOINDER**

On September 15, 2020, at 9:30 a.m., the above-captioned case came before the Honorable Judge Gloria Sturman, regarding Defendant/Cross Claimant INGRID PATIN'S *Motion for Judgment on the Pleadings, in the Alternative, Motion for Summary Judgment* and Defendant/Cross Defendant PATIN LAW GROUP, PLLC'S *Joinder To Defendant Ingrid Patin's Motion For Judgment On The Pleadings, In The Alternative, Motion For Summary Judgment Defendant's Motion for Summary Judgment on the Pleadings*, with Christian M. Morris, Esq. of Nettles Morris appearing on behalf of INGRID PATIN, Kerry J. Doyle, Esq. of Doyle Law Group appearing on behalf of PATIN LAW GROUP, PLLC, and Prescott T. Jones of RESNICK & LOUIS, PC appearing on behalf of Plaintiff TON VINH LEE. The Court,

1 having reviewed this Motion, the papers and pleadings on file herein, and the arguments of  
2 counsel, finds and orders as follows:

3 **FINDINGS OF FACT**

- 4 1. The Court finds that this is an action for defamation per se regarding a statement on  
5 the patinlaw.com website about a wrongful death/dental malpractice lawsuit that  
6 arose from a wisdom tooth extraction.
- 7 2. The Court finds that, on February 7, 2012, a dental malpractice lawsuit was filed  
8 against the Plaintiff's dental practice, the Plaintiff as the owner, as well as two other  
9 dentists who assisted in the procedure.
- 10 3. The Court finds that, according to Court records, the lawsuit went to trial and  
11 Plaintiff Singletary received a jury award in its favor against Ton Vinh Lee's dental  
12 practice and the two other dentists who performed the procedure. Ton Vinh Lee  
13 received a verdict in favor and was awarded his costs from Plaintiff Singletary.
- 14 4. The Court finds that, according to Court records, after the verdict was entered, the  
15 district court granted a renewed motion for judgment as a matter of law, overturning  
16 the jury award. The jury award in favor of Ton Vinh Lee was not overturned.
- 17 5. The Court finds that, according to Court records, after the jury award in favor of  
18 Plaintiff Singletary was overturned, an appeal was filed and the verdict in favor of  
19 Plaintiff Singletary was reinstated.
- 20 6. The Court finds that the alleged defamatory statement was made on patinlaw.com  
21 regarding the verdict and who the parties to the lawsuit were.
- 22 7. The Court finds that the following statements testified to by Plaintiff during his  
23 sworn deposition on July 14, 2020 were true and accurate:
  - 24 a. The Court finds that Plaintiff admits the matter was a dental  
25 malpractice/wrongful death action.
  - 26 b. The Court finds that Plaintiff admits the trial jury resulted in a plaintiffs'  
27 verdict against his practice and two other dentists who performed the  
28 procedure, but also noted that a verdict was rendered in his favor as against



1 Plaintiff Singletary.

2 c. The Court finds that Plaintiff admits the description of the Complaint was  
3 *Singletary v. Ton Vinh Lee DDS, et al.*.

4 d. The Court finds that Plaintiff admits that *Singletary* was a dental malpractice-  
5 based wrongful death action that arose from the death of Reginald Singletary.

6 e. The Court finds that Plaintiff admits that Singletary had sued the dental  
7 office of Summerlin Smiles.

8 f. The Court finds that Plaintiff admits that Singletary had sued the treating  
9 dentists, Florida Traivai DMD and Jai Park DDS.

10 g. The Court finds that Plaintiff admits that Singletary had sued on behalf of the  
11 estate, herself, and minor son.

12 8. The Court reviewed the statement line by line and finds that there was a Plaintiffs'  
13 verdict for \$3.4 million on the medical malpractice trial.

#### 14 CONCLUSIONS OF LAW

15 **THE COURT CONCLUDES** that under *Sahara Gaming Corp. v. Culinary Workers*  
16 *Union Local 226*, 115 Nev. 212, 215 (1999) statements recounting judicial proceedings are  
17 protected against claims of defamation by the absolute “fair-reporting” privilege. Further, the  
18 privilege protects any person – whether a member of the media or the public – provided the  
19 statements are a fair and impartial reporting of the facts.

20 **THE COURT FURTHER CONCLUDES** that Defendants’ statement was a fair and  
21 impartial reporting of the facts of the *Singletary* case, per *Sahara Gaming Corp.*

22 **THE COURT FURTHER CONCLUDES** that under *Adelson v. Harris*, 402 P.3d 665  
23 (Nev. 2017), the State adopted the test established in *Dameron v. Wash Magazine, Inc.*,  
24 whereby a summary of an official document or proceeding must be apparent either from  
25 specific attribution to the official document or from the overall context of the official document  
26 that the summary is quoting, paraphrasing, or otherwise drawing.

27 **THE COURT FURTHER CONCLUDES** that Defendants’ statement is a fair and  
28 impartial summary of the facts attributed to official documents or proceedings from the

1 *Singletary* case, as the statement references the case name, per *Adelson*.

2 **THE COURT FURTHER CONCLUDES** that the content of the alleged defamatory  
3 statement represents fair and impartial reporting of official proceedings and thus falls under the  
4 “fair reporting” privilege.

5 **THE COURT FURTHER CONCLUDES** that there is no distinction made under the  
6 “fair reporting” privilege between an individual and a corporation, and no such argument was  
7 made by Plaintiff. Therefore, the privilege would apply to both Defendant Ingrid Patin,  
8 individually, and Defendant Patin Law Group, PLLC.

9 **THE COURT FURTHER CONCLUDES** that, under *Chowdhry v. NLVH, Inc.*, 109  
10 Nev. 478, 483, 851 P.2d 459 (1993), in order to establish a *prima facie* case of defamation, a  
11 plaintiff must prove the alleged defamatory statement is false and defamatory. If the defamation  
12 tends to injure the plaintiff in his or her business profession, it is deemed defamation *per se*, and  
13 damages will be presumed but Plaintiff must still prove the falsity of the statement.

14 **THE COURT FURTHER CONCLUDES** that, during Plaintiff’s sworn deposition  
15 testimony, Plaintiff admitted every sentence of the statement was true, but did not admit it was  
16 true in its entirety.

17 **THE COURT FURTHER CONCLUDES** that Plaintiff has no evidence the statement  
18 is false, per *Chowdry*.

19 **THE COURT FURTHER CONCLUDES** that, while Defendants did not authenticate  
20 the deposition transcript from the deposition of Plaintiff, the Court accepts the transcript as the  
21 sworn testimony of the Plaintiff as Plaintiff did not dispute this was his sworn testimony under  
22 oath or object to the testimony in any pleadings.

23 **THE COURT FURTHER CONCLUDES** that based upon the fact there is no genuine  
24 material issue as to the falsity of the statement, as Plaintiff admitted it was true; therefore  
25 Defendants’ statement on the website does not satisfy the elements of false and defamatory for a  
26 *prima facie* case of defamation *per se*.

27 **THE COURT FURTHER CONCLUDES** that there are no genuine issues of material  
28 fact as to the truth of the alleged defamatory statement.

*Case Name: Ton Vinh Lee v. Ingrid Patin*

*Case Number: A-15-723134-C*

**THE COURT FURTHER CONCLUDES** that Defendant Patin Law Group properly filed a joinder to the Motion and is entitled to the same ruling as Defendant Ingrid Patin.

**ORDER**

**IT IS ORDERED THAT**, based on the findings above and the facts provided in Plaintiff's deposition Defendants' *Motion for Summary Judgment and Joinder* as to the facts of the case and under the Fair Reporting Privilege is GRANTED.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2020. ~~Dated this 28th day of October, 2020~~



DISTRICT COURT JUDGE  
B09 1D5 EDF7 9C07  
Gloria Sturman  
District Court Judge

DATED this 16<sup>th</sup> day of October, 2020.

DATED this 16<sup>th</sup> day of October, 2020.

NETTLES | MORRIS

RESNICK & LOUIS, P.C.

/s/ Christian M. Morris  
BRIAN D. NETTLES, ESQ.  
Nevada Bar No. 7462  
CHRISTIAN M. MORRIS, ESQ.  
Nevada Bar No. 11218  
VICTORIA R. ALLEN, ESQ.  
Nevada Bar No. 15005  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
*Attorneys for Defendant, Ingrid Patin*  
DATED this 16<sup>th</sup> day of October, 2020.

/s/ Prescott Jones  
PRESCOTT JONES, ESQ.  
Nevada Bar No. 11617  
MYRAELIGH A. ALBERTO, ESQ.  
Nevada Bar No. 14340  
8925 W. Russell road, Suite 220  
Las Vegas, Nevada 89148  
*Attorneys for Plaintiff,*  
*Ton Vinh Lee*

DOYLE LAW GROUP

/s/ Kerry J. Doyle  
KERRY J. DOYLE, ESQ.  
Nevada Bar No. 10571  
7375 S. Pecos Rd., #101  
Las Vegas, Nevada 89120  
*Attorneys for Defendant, Patin Law Group,*  
*PLLC*

## Jenn Alexy

---

**From:** Kerry Doyle <kdoyle@doylelawgroupplv.com>  
**Sent:** Friday, October 16, 2020 2:37 PM  
**To:** Prescott Jones  
**Cc:** Christian Morris; Jenn Alexy; Myraleigh Alberto; Susan Carbone  
**Subject:** Re: Lee vs. Patin: Order from 9/15 hearing

You can attach mine as well.

Sent from my iPhone

On Oct 16, 2020, at 2:29 PM, Prescott Jones <pjones@rlattorneys.com> wrote:

Thanks Christian. You can include my electronic signature.

Prescott T. Jones, Esq.  
Resnick & Louis, P.C.  
8925 West Russell Road, Suite 220  
Las Vegas, NV 89148  
Direct Phone: 702-997-1029  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
<http://www.rlattorneys.com>

<image001.png>

ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI |  
ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA |  
LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Christian Morris <Christian@nettlesmorris.com>  
Sent: Friday, October 16, 2020 2:22 PM  
To: Prescott Jones <pjones@rlattorneys.com>; Jenn Alexy <Jenn@nettlesmorris.com>; Kerry Doyle <kdoyle@doylelawgroupplv.com>  
Cc: Myraleigh Alberto <malberto@rlattorneys.com>; Susan Carbone <scarbone@rlattorneys.com>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Prescott,  
Changes made and attached in tracked form.  
Thanks,  
**Ms. Christian M. Morris, Esq.**  
**Managing Partner**

2019 Nevada Trial Lawyer of the Year

California Bar # 277641

New Jersey Bar # 006362012

Nevada Bar # 11218

**NETTLES | MORRIS**

[www.nettlesmorris.com](http://www.nettlesmorris.com)

1389 Galleria Drive. Ste 200

Henderson, NV 89014

**Phone (702) 434-8282**

Fax (702) 434-1488

[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)

*Governor, American Association of Justice (AAJ)*

*Governor, Nevada Justice Association (NJA)*

<image002.png>

---

From: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>

Sent: Friday, October 16, 2020 2:05 PM

To: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgroupnv.com](mailto:kdoyle@doylelawgroupnv.com)>

Cc: Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>; Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>

Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Christian –

Transcript is attached. Thanks.

Prescott T. Jones, Esq.

Resnick & Louis, P.C.

8925 West Russell Road, Suite 220

Las Vegas, NV 89148

Direct Phone: 702-997-1029

[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)

<http://www.rlattorneys.com>

<image001.png>

ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI |  
ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA |  
LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>

Sent: Friday, October 16, 2020 2:03 PM

To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgroupnv.com](mailto:kdoyle@doylelawgroupnv.com)>

Cc: Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>; Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Prescott,  
Can you please send the transcript?  
Thanks,

**Ms. Christian M. Morris, Esq.**  
**Managing Partner**  
2019 Nevada Trial Lawyer of the Year  
California Bar # 277641  
New Jersey Bar # 006362012  
Nevada Bar # 11218  
**NETTLES | MORRIS**  
[www.nettlesmorris.com](http://www.nettlesmorris.com)  
1389 Galleria Drive. Ste 200  
Henderson, NV 89014  
**Phone (702) 434-8282**  
Fax (702) 434-1488  
[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)  
*Governor, American Association of Justice (AAJ)*  
*Governor, Nevada Justice Association (NJA)*

<image002.png>

---

From: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>  
Sent: Friday, October 16, 2020 1:51 PM  
To: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgroupplv.com](mailto:kdoyle@doylelawgroupplv.com)>  
Cc: Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>; Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Christian,

Regarding Finding of Fact 4, the jury award was not overturned in favor of Dr. Lee as a result of the Judgment as a Matter of Law. Is there any reason by "The jury award in favor of Ton Vinh Less was not overturned" was not included in your proposed order?

I also note that you did not include my proposed Finding of Fact 7h - "The Court finds that Plaintiff, while admitting that each part of the statement was true, disputed that the statement when read as a whole was true." Please note the following from the transcript of the hearing:

THE COURT: 57 of the transcript.

MR. JONES: Yeah, I'm looking at page 39 of my PDF here, lines 19 to 21. The question was asked by Ms. Morris to my client.

"Q So what part of the statement is untrue?"

The answer by my client,

"A It's the whole or some and not just the parts."

I just want to make it clear that my client certainly --

THE COURT: Okay.

MR. JONES: -- didn't admit that the statement was true in its entirety, just simply the individual parts.

THE COURT: Okay. I appreciate that. And, certainly, if you want to make sure that that's in the findings of fact and conclusions of law, I understand. And Ms. Morris will prepare those, and she'll show them to you before we submit them to the Court.  
So I appreciate you've made that clear for the record, and we'll include that in the findings, okay.

Please let me know your thoughts on the above – thanks.

Prescott T. Jones, Esq.  
Resnick & Louis, P.C.  
8925 West Russell Road, Suite 220  
Las Vegas, NV 89148  
Direct Phone: 702-997-1029  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
<http://www.rlattorneys.com>

<image001.png>

ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI |  
ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA |  
LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>  
Sent: Tuesday, October 13, 2020 8:31 PM  
To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgroupplv.com](mailto:kdoyle@doylelawgroupplv.com)>  
Cc: Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>; Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Prescott,  
I received your e-mail and reviewed your proposed changes. I have incorporated a majority of them. A few I cannot, as they are not supported by the record. Please let me know if you agree to the new proposed Order so we can submit to Chambers.  
Thank you,

**Ms. Christian M. Morris, Esq.**  
**Managing Partner**  
2019 Nevada Trial Lawyer of the Year  
California Bar # 277641  
New Jersey Bar # 006362012  
Nevada Bar # 11218  
**NETTLES | MORRIS**  
[www.nettlesmorris.com](http://www.nettlesmorris.com)  
1389 Galleria Drive. Ste 200  
Henderson, NV 89014  
**Phone (702) 434-8282**  
Fax (702) 434-1488

[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)

*Governor, American Association of Justice (AAJ)*

*Governor, Nevada Justice Association (NJA)*

<image002.png>

---

From: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>

Sent: Tuesday, October 6, 2020 4:27 PM

To: Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgrouplv.com](mailto:kdoyle@doylelawgrouplv.com)>

Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>;

Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>

Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Christian,

I've reviewed your proposed order, the briefs filed by the parties, and the transcript of the hearing, and request the below revisions. If you disagree with any of the below, please let me know what portion of the transcript and/or briefing supports your proposed language. Thanks.

Findings of Fact No. 3 – should be changed to “The Court finds that, according to Court records, the lawsuit went to trial and Plaintiff Singletary received a jury award in its favor as against Ton Vinh Lee’s dental practice and the two other dentists who performed the procedure. Ton Vinh Lee received a verdict in favor and was awarded his costs from Plaintiff Singletary.”

Findings of Fact No. 4 – should be changed to “. . . overturning the jury award in favor of Plaintiff Singletary. The jury award in favor of Ton Vinh Lee was not overturned.”

Findings of Fact No. 5 – should be changed to “. . . after the jury award in favor of Plaintiff Singletary was overturned, an appeal was filed and the verdict in favor of Plaintiff Singletary was reinstated.”

Findings of Fact No. 7b – should be changed to “The Court finds that Plaintiff admits the jury trial resulted in a plaintiffs’ verdict against his practice and two other dentists who performed the procedure, but also noted that a verdict was rendered in his favor as against plaintiff Singletary.”

Findings of Fact No. 7d – “Reginald” is misspelled.

Findings of Fact No. 7e – “Summerlin Smiles” is misspelled.

Findings of Fact No. 7h needs to be added and read “The Court finds that Plaintiff, while admitting that each part of the statement was true, disputed that the statement when read as a whole was true.”

Conclusions of Law on page 3, lines 22-24 – the portion of the paragraph reading “attributed to official documetns or proceedings from the Singletary case, as the statement references the case name, per Adelson” should be removed, as the Court did not make this ruling. If you can point to something in the transcript where the Court made this ruling, please let me know.

Conclusions of Law on page 4, lines 9-11 needs to have “but did not like the way it read as a whole” needs to be removed and replaced with “but also disputed that the statement when read as a whole was true.” This is consistent with the deposition testimony provided by your client in her Motion and Reply.



Conclusions of Law on page 4, lines 14-15 need to be removed and replaced with "THE COURT FURTHER CONCLUDES that, while Defendants did not authenticate the deposition transcript from the deposition of Plaintiff, the Court accepts the transcript as the sworn testimony of the Plaintiff."

Conclusions of Law on page 4, line 17 – the portion reading "as Plaintiff admitted it was true" needs to be replaced with "as Plaintiff admitted each portion of the statement was true, while disagreeing with the truth of the statement as a whole." Alternatively, I would accept removal of the quoted portion without replacement.

Regards,

Prescott T. Jones, Esq.  
Resnick & Louis, P.C.  
8925 West Russell Road, Suite 220  
Las Vegas, NV 89148  
Direct Phone: 702-997-1029  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
<http://www.rlattorneys.com>

<image001.png>

ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI |  
ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA |  
LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>  
Sent: Tuesday, October 6, 2020 8:59 AM  
To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Kerry Doyle <[kdoyle@doylelawgroupplv.com](mailto:kdoyle@doylelawgroupplv.com)>  
Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>;  
Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hello Prescott and Kerry,

Just following up on the email below and the proposed Order. Please let us know as soon as you are able. Thank you.

## **Jenn Alexy**

Paralegal to Christian M. Morris, Esq.,  
Edward J. Wynder, Esq., and Tori R. Allen, Esq.  
**NETTLES | MORRIS**  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Direct Tel: (702) 763-6918  
Tel: (702) 434-8282 ext. 238  
Fax: (702) 786-0402

---

From: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>  
Sent: Thursday, October 1, 2020 3:39 PM  
To: Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgrouplv.com](mailto:kdoyle@doylelawgrouplv.com)>  
Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>;  
Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Jenn,

I am in deposition today but should be able to review and respond back by tomorrow. Thanks.

Prescott T. Jones, Esq.  
Resnick & Louis, P.C.  
8925 West Russell Road, Suite 220  
Las Vegas, NV 89148  
Direct Phone: 702-997-1029  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
<http://www.rlattorneys.com>

<image001.png>

ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI |  
ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA |  
LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>  
Sent: Thursday, October 1, 2020 3:30 PM  
To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Kerry Doyle <[kdoyle@doylelawgrouplv.com](mailto:kdoyle@doylelawgrouplv.com)>  
Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>;  
Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: Lee vs. Patin: Order from 9/15 hearing

Hello,

Please see attached the draft Order granting Defendant Ingrid Patin's Motion for Summary Judgment and Patin Law Group's Joinder.

Please review and advise if any changes need to be made. If no changes are needed, please confirm your e-signature can be inserted for submission to the Court.

Thank you.

**Jenn Alexy**

Paralegal to Christian M. Morris, Esq.,  
Edward J. Wynder, Esq., and Tori R. Allen, Esq.  
**NETTLES | MORRIS**

1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Ton Lee, Plaintiff(s)

CASE NO: A-15-723134-C

7 vs.

DEPT. NO. Department 26

8 Ingrid Patin, Defendant(s)

9  
10 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 10/28/2020

15 "Christian M. Morris, Esq." . christianmorris@nettleslawfirm.com

16 "Jeremy J. Thompson, Esq." . jthompson@mpplaw.com

17 "Paul E Larsen, Esq." . plarsen@mpplaw.com

18 Coreene Drose . cdrose@rlattorneys.com

19 Cristina Robertson . crobertson@mpplaw.com

20 Debbie Surowiec . dsurowiec@mpplaw.com

21 Ingrid Patin . ingrid@patinlaw.com

22 Jenn Alexy . jenn@nettleslawfirm.com

23 Joyce Ulmer . julmer@mpplaw.com

24 Lisa Bell . lbell@rlattorneys.com

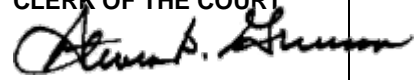
25 Nancy C. Rodriguez . nrodriguez@mpplaw.com

26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Prescott Jones .	pjones@rlattorneys.com
Christian Morris	christian@nettlesmorris.com
Susan Carbone	scarbone@rlattorneys.com
Jessica Humphrey	jhumphrey@rlattorneys.com
Tori Allen	victoria@nettlesmorris.com
Kerry Doyle	kdoyle@doylelawgroup.lv.com
Mikayla Hurtt	admin@doylelawgroup.lv.com
Emily Arriviello	emily@nettlesmorris.com
Myraleigh Alberto	malberto@rlattorneys.com

## **EXHIBIT “B”**



NEOJ  
CHRISTIAN M. MORRIS, ESQ.  
Nevada Bar No. 11218  
NETTLES | MORRIS  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Telephone: (702) 434-8282  
Facsimile: (702) 434-1488  
[christian@nettlesmorris.com](mailto:christian@nettlesmorris.com)  
*Attorney for Defendant, Ingrid Patin*

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

TON VINH LEE, an individual,  
  
Plaintiff,

v.

INGRID PATIN, an individual, and PATIN  
LAW GROUP, PLLC, a Nevada  
Professional LLC,  
  
Defendants.

CASE NO.: A-15-723134-C  
DEPT NO.: 26

**NOTICE OF ENTRY OF ORDER**

TO: ALL PARTIES; and  
TO: THEIR RESPECTIVE ATTORNEYS:

**PLEASE TAKE NOTICE** that an Order denying Plaintiff's Motion to Alter/Amend Judgment and Order Continuing Plaintiff's Motion for Reconsideration, Defendant Ingrid Patin's Motions for Fees, Costs, and Interest and Defendant Patin Law Group, PLLC's Motion for Attorneys Fees and Interest was duly entered in the above-entitled matter on the 21<sup>st</sup> day of January, 2021, a true and correct copy of said Order is attached hereto.

DATED this 21<sup>st</sup> day of January, 2021.

NETTLES | MORRIS



CHRISTIAN M. MORRIS, ESQ.  
Nevada Bar No. 011218  
*Attorney for Defendant, Ingrid Patin*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

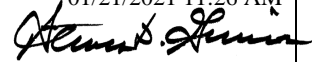
Pursuant to NEFCR 9, NRCP 5(b) and EDCR 7.26, I hereby certify that on this 21<sup>st</sup> day of January, 2021, a true and correct copy of the foregoing **NOTICE OF ENTRY OF ORDER** was served to the following parties by electronic transmission through the Odyssey eFileNV system and/or by depositing in the US Mail, postage prepaid, addressed as follows:

Kerry Doyle	kdoyle@doylelawgroupnv.com
Mikayla Hurtt	admin@doylelawgroupnv.com
Coreene Drose	cdrose@rlattorneys.com
Ingrid Patin	ingrid@patinlaw.com
Lisa Bell	lbell@rlattorneys.com
Prescott Jones	pjones@rlattorneys.com
Susan Carbone	scarbone@rlattorneys.com
Jessica Humphrey	jhumphrey@rlattorneys.com



---

An Employee of NETTLES | MORRIS

  
CLERK OF THE COURT

**NETTLES | MORRIS**  
1389 Galleria Drive Suite 200  
Henderson, NV 89014  
(702) 434-8282 / (702) 434-1488 (fax)

**ORDR**

CHRISTIAN M. MORRIS, ESQ.

Nevada Bar No. 11218

VICTORIA R. ALLEN, ESQ.

Nevada Bar No. 15005

NETTLES | MORRIS

1389 Galleria Drive, Suite 200

Henderson, Nevada 89014

Telephone: (702) 434-8282

Facsimile: (702) 434-1488

[brian@nettlesmorris.com](mailto:brian@nettlesmorris.com)

[christian@nettlesmorris.com](mailto:christian@nettlesmorris.com)

[victoria@nettlesmorris.com](mailto:victoria@nettlesmorris.com)

*Attorneys for Defendant, Ingrid Patin*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

TON VINH LEE, an individual;

Plaintiff,

vs.

INGRID PATIN, an individual, and  
PATIN LAW GROUP, PLLC, a Nevada  
Professional LLC,

Defendants.

CASE NO.: A-15-723134-C

DEPT NO.: XXVI

**ORDER DENYING PLAINTIFF'S MOTION TO ALTER/AMEND JUDGMENT AND  
ORDER CONTINUING PLAINTIFF'S MOTION FOR RECONSIDERATION,  
DEFENDANT INGRID PATIN'S MOTIONS FOR FEES, COSTS, AND INTEREST  
AND DEFENDANT PATIN LAW GROUP, PLLC'S MOTION FOR ATTORNEYS  
FEES AND INTEREST**

On January 6, 2021, at 9:30 a.m., the above-captioned case came before the Honorable Judge Nancy Becker, regarding Plaintiff TON VINH LEE'S *Motion to Alter/Amend Judgment*, Plaintiff TON VINH LEE'S *Motion for Reconsideration*, Defendant INGRID PATIN'S *Motion for Attorney's Fees, Costs, and Interest*, and Defendant PATIN LAW GROUP, PLLC'S *Motion for Attorney's Fees and Interest* with Christian M. Morris, Esq. of Nettles Morris appearing on behalf of INGRID PATIN, Kerry J. Doyle, Esq. of Doyle Law Group appearing on behalf of



**Case Name: Ton Vinh Lee v. Ingrid Patin**

**Case Number: A-15-723134-C**

PATIN LAW GROUP, PLLC, and Prescott T. Jones of RESNICK & LOUIS, PC appearing on behalf of Plaintiff TON VINH LEE. The Court, having reviewed this Motion, the papers and pleadings on file herein, and the arguments of counsel, finds and orders as follows:

**FINDINGS OF FACT**

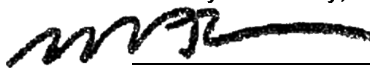
1. The Court finds that Plaintiff's Motion to Alter/Amend Judgment and Plaintiff's Motion for Reconsideration were the same and thus there is no mechanism to have both motions.
2. The Court finds that the remaining Motions will be continued in order to be heard with Judge Sturman, on February 9, 2021 at 9:30 a.m.

**ORDER**

**IT IS ORDERED THAT,** Plaintiff's *Motion to Alter/Amend Judgment* is DENIED.

**IT IS FURTHER ORDER THAT,** Plaintiff's *Motion for Reconsideration*, Defendant Ingrid Patin's *Motion for Attorney's Fees, Costs, and Interest*, and Defendant Patin Law Group, PLLC's *Motion for Attorney's Fees and Interest* is continued to February 9, 2021 at 9:30 a.m.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2021.  
~~Dated this 21st day of January, 2021~~



DISTRICT COURT JUDGE

E88 AD6 0567 131C

for Judge Becker

DATED this 20<sup>th</sup> day of January, 2021. ~~DATED this 20<sup>th</sup> day of January, 2021.~~  
Gloria Sturman  
District Court Judge

NETTLES | MORRIS

RESNICK & LOUIS, P.C.

/s/ Christian M. Morris

/s/ Prescott Jones

CHRISTIAN M. MORRIS, ESQ.

PRESCOTT JONES, ESQ.

Nevada Bar No. 11218

Nevada Bar No. 11617

1389 Galleria Drive, Suite 200

8925 W. Russell Road, Suite 220

Henderson, Nevada 89014

Las Vegas, Nevada 89148

*Attorneys for Defendant, Ingrid Patin*

*Attorneys for Plaintiff, Ton Vinh Lee*

*Case Name: Ton Vinh Lee v. Ingrid Patin*

*Case Number: A-15-723134-C*

DATED this 20<sup>th</sup> day of January, 2021.

DOYLE LAW GROUP

/s/ Kerry J. Doyle

KERRY J. DOYLE, ESQ.

Nevada Bar No. 10571

7375 S. Pecos Rd., #101

Las Vegas, Nevada 89120

*Attorneys for Defendant, Patin Law Group,*

*PLLC*

## Jenn Alexy

---

**From:** Prescott Jones <pjones@rlattorneys.com>  
**Sent:** Wednesday, January 20, 2021 4:14 PM  
**To:** Jenn Alexy  
**Cc:** Christian Morris; Kerry Doyle  
**Subject:** RE: Patin adv. Lee \*Order from 1/6/21 Hearing\*

Approved. Please include my e-signature.

Prescott T. Jones, Esq.  
Resnick & Louis, P.C.  
8925 West Russell Road, Suite 220  
Las Vegas, NV 89148  
Direct Phone: 702-997-1029  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
<http://www.rlattorneys.com>



ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI | ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA | LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Jenn Alexy <Jenn@nettlesmorris.com>  
Sent: Wednesday, January 20, 2021 10:17 AM  
To: Prescott Jones <pjones@rlattorneys.com>  
Cc: Christian Morris <Christian@nettlesmorris.com>; Kerry Doyle <kdoyle@doylelawgroupnv.com>  
Subject: FW: Patin adv. Lee \*Order from 1/6/21 Hearing\*

Hello,

Following up on the attached draft Order from the 1/6/21 hearing. Please review and advise if any changes need to be made. If no changes are needed, please confirm your e-signature can be inserted for filing with the Court. Thank you.

## Jenn Alexy

Paralegal to Christian M. Morris, Esq.,  
Edward J. Wynder, Esq., and Tori R. Allen, Esq.  
**NETTLES | MORRIS**  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Direct Office Tel: (702) 763-6918  
Cell: (702) 274-7114

Tel: (702) 434-8282 ext. 238

Fax: (702) 786-0402

---

From: Jenn Alexy

Sent: Thursday, January 14, 2021 11:24 AM

To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Kerry Doyle <[kdoyle@doylelawgrouplv.com](mailto:kdoyle@doylelawgrouplv.com)>

Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>

Subject: Patin adv. Lee \*Order from 1/6/21 Hearing\*

Counsel,

Please see attached the draft Order from the 1/6/21 hearing for the above-referenced case.

Please review and advise if any changes need to be made. If no changes are needed, please confirm your e-signature can be inserted for filing with the Court. Thank you.

**Jenn Alexy**

Paralegal to Christian M. Morris, Esq.,

Edward J. Wynder, Esq., and Tori R. Allen, Esq.

**NETTLES | MORRIS**

1389 Galleria Drive, Suite 200

Henderson, Nevada 89014

Direct Office Tel: (702) 763-6918

Cell: (702) 274-7114

Tel: (702) 434-8282 ext. 238

Fax: (702) 786-0402

## Jenn Alexy

---

**From:** Kerry Doyle <kdoyle@doylelawgrouplv.com>  
**Sent:** Wednesday, January 20, 2021 10:28 AM  
**To:** Jenn Alexy  
**Subject:** Re: Patin adv. Lee \*Order from 1/6/21 Hearing\*

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Red Category

E-sig is fine.

Kerry J. Doyle, Esq.  
Doyle Law Group  
7375 S. Pecos Rd. #101  
Las Vegas, NV 89120  
702.706.3323 (general)  
702.921.7823 (fax)  
[kdoyle@DoyleLawGroupLV.com](mailto:kdoyle@DoyleLawGroupLV.com)  
[www.DoyleLawGroupLV.com](http://www.DoyleLawGroupLV.com)



NOTICE: The information contained in this electronic message is intended only for the personal and confidential use of the designated recipient(s) named above. This message may be attorney-client communication, and as such, is privileged and confidential. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error, and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone or return e-mail and permanently destroy all original messages. Thank you.

On Jan 20, 2021, at 10:17 AM, Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)> wrote:

Hello,

Following up on the attached draft Order from the 1/6/21 hearing. Please review and advise if any changes need to be made. If no changes are needed, please confirm your e-signature can be inserted for filing with the Court. Thank you.

**Jenn Alexy**

Paralegal to Christian M. Morris, Esq.,  
Edward J. Wynder, Esq., and Tori R. Allen, Esq.  
**NETTLES | MORRIS**  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014

Direct Office Tel: (702) 763-6918  
Cell: (702) 274-7114  
Tel: (702) 434-8282 ext. 238  
Fax: (702) 786-0402

---

From: Jenn Alexy  
Sent: Thursday, January 14, 2021 11:24 AM  
To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Kerry Doyle <[kdoyle@doylelawgroupnv.com](mailto:kdoyle@doylelawgroupnv.com)>  
Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>  
Subject: Patin adv. Lee \*Order from 1/6/21 Hearing\*

Counsel,

Please see attached the draft Order from the 1/6/21 hearing for the above-referenced case.

Please review and advise if any changes need to be made. If no changes are needed, please confirm your e-signature can be inserted for filing with the Court. Thank you.

**Jenn Alexy**

Paralegal to Christian M. Morris, Esq.,  
Edward J. Wynder, Esq., and Tori R. Allen, Esq.

**NETTLES | MORRIS**

1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Direct Office Tel: (702) 763-6918  
Cell: (702) 274-7114  
Tel: (702) 434-8282 ext. 238  
Fax: (702) 786-0402

<Order on Pltfs Mot for Recons. and Defts Attorneys Fees and Costs.pdf><Order on Pltfs Mot for Recons. and Defts Attorneys Fees and Costs.doc>

1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Ton Lee, Plaintiff(s)

CASE NO: A-15-723134-C

7 vs.

DEPT. NO. Department 26

8 Ingrid Patin, Defendant(s)

9  
10 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 1/21/2021

15 "Christian M. Morris, Esq." . christianmorris@nettleslawfirm.com

16 "Jeremy J. Thompson, Esq." . jthompson@mpplaw.com

17 "Paul E Larsen, Esq." . plarsen@mpplaw.com

18 Coreene Drose . cdrose@rlattorneys.com

19 Cristina Robertson . crobertson@mpplaw.com

20 Debbie Surowiec . dsurowiec@mpplaw.com

21 Ingrid Patin . ingrid@patinlaw.com

22 Jenn Alexy . jenn@nettleslawfirm.com

23 Joyce Ulmer . julmer@mpplaw.com

24 Lisa Bell . lbell@rlattorneys.com

25 Nancy C. Rodriguez . nrodriguez@mpplaw.com

26

27

28

1	Prescott Jones .	pjones@rlattorneys.com
2	Christian Morris	christian@nettlesmorris.com
3	Tori Allen	victoria@nettlesmorris.com
4	Kerry Doyle	kdoyle@doylelawgroup.lv.com
5	Mikayla Hurtt	admin@doylelawgroup.lv.com
6	Emily Arriviello	emily@nettlesmorris.com
7	Myraleigh Alberto	malberto@rlattorneys.com
8	Brittany Willis	bwillis@rlattorneys.com
9	Susan Carbone	Scarbone@rlattorneys.com
10	Jessica Humphrey	Jhumphrey@rlattorneys.com
11	Melanie Herman	mail@rlattorneys.com
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		





1 **ASTA**  
2 **RESNICK & LOUIS, P.C.**  
3 PRESCOTT JONES  
4 Nevada Bar No. 11617  
5 [pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
6 MYRALEIGH A. ALBERTO  
7 Nevada Bar No. 14340  
8 [malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)  
9 8925 W. Russell Road, Suite 220  
10 Las Vegas, Nevada 89148  
11 Telephone: (702) 997-3800  
12 Facsimile: (702) 997-3800  
13 *Attorneys for Plaintiff,*  
14 *Ton Vinh Lee*

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

13 TON VINH LEE,  
14  
15 Plaintiff,  
16 v.

17 INGRID PATIN, an individual, and PATIN  
18 LAW GROUP, PLLC, a Nevada Professional  
19 LLC,  
20 Defendants.

CASE NO.: A-15-723134-C

DEPT: 26

**CASE APPEAL STATEMENT**

21  
22 PLAINTIFF TON VINH LEE, by and through his attorneys of record, PRESCOTT T.  
23 JONES, ESQ. and MYRALEIGH A. ALBERTO, ESQ. of the law firm of RESNICK & LOUIS,  
24 P.C., hereby files this CASE APPEAL STATEMENT.

25 1. Name of appellant filing this Case Appeal Statement:

26 Plaintiff Ton Vinh Lee

27 2. Identify the Judge issuing the decision, judgment, or order appealed from:  
28

1 The Honorable Gloria Sturman.

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

3 Appellant:

4 TON VINH LEE (an individual)

5 Attorneys: Prescott T. Jones, Esq.  
6 Myraleigh A. Alberto, Esq.  
7 Resnick & Louis, PC  
8 8925 W. Russell Rd., Suite 220  
9 Las Vegas, NV 89144

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

12 Respondents: Ingrid Patin (an individual) and Patin Law Group, PLLC

13 Attorneys: Christian M. Morris, Esq.  
14 Nettles Morris  
15 1398 Galleria Drive, Suite 200  
16 Henderson, NV 89014  
17 *Attorney for Ingrid Patin*

18 Kerry J. Doyle, Esq.  
19 DOYLE LAW GROUP  
20 7375 S. Pecos Rd., #101  
21 Las Vegas, NV 89120  
22 *Attorney for Patin Law Group, PLLC*

23 5. Indicate whether any attorney identified above in response to question 3 or 4 is  
24 not licensed to practice law in Nevada and, if so, whether the district court granted that attorney  
25 permission to appear under SCR 42:

26 N/A.

27 6. Indicate whether appellant was represented by appointed or retained counsel in  
28 the district court:

Retained counsel.

1           7.     Indicate whether appellant is represented by appointed or retained counsel on  
2 appeal:

3                     Retained counsel.

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

6                     N/A.

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

9                     The complaint was filed on August 17, 2015.

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

13                     This appeal is taken from a civil action brought by Plaintiff Ton Vinh Lee, a  
14 dentist, against Defendants Ingrid Patin and Patin Law Group, the attorney and legal practice that  
15 represented a plaintiff who had previously filed suit against Plaintiff, and other parties, in  
16 Singletary v. Ton Lee, DDS et. al. (Eighth Judicial District Court Case No. A-12-656091-C).  
17 The case being appealed consists of Plaintiff's sole claim of defamation *per se* against both  
18 Defendants. This defamation *per se* claim arises out of Plaintiff's position that Defendants  
19 published a defamatory statement on the website of Patin Law Group, PLLC (owned by  
20 Defendant Ingrid Patin) that falsely asserts that Defendants' former client in the Singletary case  
21 recovered a \$3.4 million jury verdict against all named Singletary defendants, including Plaintiff,  
22 and that Defendants' statement imputes to Plaintiff a lack of fitness as a dentist and as a business  
23 owner.  
24  
25  
26  
27  
28

1 On August 7, 2020, Defendant Ingrid Patin filed her Motion for Judgment on the  
2 Pleadings, or in the Alternative, Summary Judgment, which was joined by Defendant Patin Law  
3 Group, PLLC. Defendants' Motion claimed that Plaintiff's deposition testimony provided new  
4 information that proved Defendants' statement to be true. Plaintiff's Opposition to Defendants'  
5 Motion argued that Plaintiff's deposition testimony presented no new facts or information  
6 regarding the truth/falsity of Defendants' statement and that there remain genuine issues of  
7 material fact regarding the truth/falsity of Defendant's statement which must be decided by a  
8 jury. On October 28, 2020, the Court issued its Order Granting Defendant Ingrid Patin's Motion  
9 for Judgment on the Pleadings, or in the Alternative, Summary Judgment. On November 24,  
10 2020, Plaintiff filed his Motion to Alter/Amend Judgment Pursuant to NRCP 59(e). On January  
11 21, 2021, the Court denied Plaintiff's Motion to Alter/Amend Judgment Pursuant to NRCP  
12 59(e).  
13

14 Plaintiff appeals the Court's October 28, 2020, Order.  
15

16 11. Indicate whether the case has previously been the subject of an appeal to or  
17 original writ proceeding in the Supreme Court and, if so, the caption and Supreme Court docket  
18 number of the prior proceeding:  
19

20 Yes. Ingrid Patin, an individual, and Patin Law Group, PLLC, a professional  
21 LLC v. Ton Vinh Lee, an individual. Supreme Court Case No. 69928, and Supreme Court Case  
22 No. 72122.

23 12. Indicate whether this appeal involves child custody or visitation:  
24

25 No.  
26  
27  
28

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

3                   Yes.

4                   DATED this 18th day of February, 2021.

5                                   **RESNICK & LOUIS, P.C.**

6                                   */s/ Myraleigh A. Alberto*

7  
8                                   \_\_\_\_\_  
9                                   PRESCOTT JONES  
10                                  Nevada Bar No. 11617  
11                                  MYRALEIGH A. ALBERTO  
12                                  Nevada Bar No. 14340  
13                                  8925 W. Russell Road, Suite 220  
14                                  Las Vegas, NV 89148  
15                                  Attorneys for Plaintiff,  
16                                  Ton Vinh Lee

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that service of the foregoing **CASE APPEAL STATEMENT** was served this 18<sup>th</sup> day of February, 2021, by:

☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada, addressed as set forth below.

☐ **BY FACSIMILE:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document.

☐ **BY PERSONAL SERVICE:** by causing personal delivery by an employee of Resnick & Louis, P.C. of the document(s) listed above to the person(s) at the address(es) set forth below.

☒ **BY ELECTRONIC SERVICE:** by transmitting via the Court's electronic filing services the document(s) listed above to the Counsel set forth on the service list on this date pursuant to EDCR Rule 7.26(c)(4).

Christian M. Morris, Esq.  
**NETTLES MORRIS**  
1389 Galleria Dr., Suite 200  
Henderson, NV 89014  
*Attorney for Defendant Ingrid Patin*

Kerry J. Doyle, Esq.  
**DOYLE LAW GROUP**  
7375 S. Pecos Rd., #101  
Las Vegas, NV 89120  
*Attorney for Defendant Patin Law Group, PLLC*

*/s/ Susan Carbone*

---

An Employee of Resnick & Louis, P.C.

**CASE SUMMARY****CASE NO. A-15-723134-C**

**Ton Lee, Plaintiff(s)**  
**vs.**  
**Ingrid Patin, Defendant(s)**

§  
§  
§  
§  
§  
§  
§

Location: **Department 26**  
 Judicial Officer: **Sturman, Gloria**  
 Filed on: **08/17/2015**  
 Case Number History:  
 Cross-Reference Case Number: **A723134**  
 Supreme Court No.: **69928**  
**72144**

**CASE INFORMATION****Statistical Closures**

10/29/2020 Summary Judgment

Case Type: **Other Tort**

Case  
Status: **10/29/2020 Closed**


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


Case Number A-15-723134-C  
 Court Department 26  
 Date Assigned 03/15/2017  
 Judicial Officer Sturman, Gloria


**PARTY INFORMATION**

		<i>Lead Attorneys</i>
<b>Plaintiff</b>	<b>Lee, Ton Vinh</b>	<b>Jones, Prescott T.</b> <i>Retained</i> 702-997-3800(W)
<b>Defendant</b>	<b>Patin Law Group PLLC</b>	<b>Larsen, Paul Edward</b> <i>Retained</i> 7023838888(W)
	<b>Patin, Ingrid</b>	<b>Nettles, Brian D.</b> <i>Retained</i> 7024348282(W)
<b>Cross Claimant</b>	<b>Patin, Ingrid</b>	<b>Nettles, Brian D.</b> <i>Retained</i> 7024348282(W)
<b>Cross Defendant</b>	<b>Patin Law Group PLLC</b>	<b>Larsen, Paul Edward</b> <i>Retained</i> 7023838888(W)

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













08/17/2015  Complaint  
 Filed By: Plaintiff Lee, Ton Vinh  
*Complaint*

08/31/2015  Affidavit of Service  
 Filed By: Plaintiff Lee, Ton Vinh  
*Affidavit of Service*

09/08/2015  Motion to Dismiss

# CASE SUMMARY

CASE NO. A-15-723134-C

	<p>Filed By: Plaintiff Lee, Ton Vinh  <i>Defendants' Motion to Dismiss</i></p>
09/23/2015	<p> Affidavit of Service            Filed By: Plaintiff Lee, Ton Vinh  <i>Affidavit of Service</i></p>
09/25/2015	<p> Opposition to Motion to Dismiss            Filed By: Plaintiff Lee, Ton Vinh  <i>Plaintiff's Opposition To Defendants' Motion To Dismiss</i></p>
10/06/2015	<p> Initial Appearance Fee Disclosure            Filed By: Plaintiff Lee, Ton Vinh  <i>Defendants' Initial Appearance Fee Disclosure</i></p>
10/06/2015	<p> Reply to Opposition            Filed by: Cross Claimant Patin, Ingrid  <i>Defendants' Reply to Plaintiff's Opposition to Motion to Dismiss</i></p>
10/14/2015	<p> Supplement to Opposition            Filed By: Plaintiff Lee, Ton Vinh  <i>Plaintiff's Supplement to Opposition to Defendants' Motion to Dismiss</i></p>
10/16/2015	<p> Motion            Filed By: Plaintiff Lee, Ton Vinh  <i>Special Motion to Dismiss Pursuant to Nevada Revised Statute 41.635-70 or in the Alternative Motion to Dismiss Pursuant to NRS 12(b)(5)</i></p>
10/20/2015	<p> Objection            Filed By: Plaintiff Lee, Ton Vinh  <i>Plaintiff's Objection To Defendant's Request For Expedited Hearing On Special Motion To Dismiss</i></p>
10/22/2015	<p> Order Denying Motion            Filed By: Plaintiff Lee, Ton Vinh  <i>Order Denying Defendants' Motion to Dismiss</i></p>
10/23/2015	<p> Notice of Entry of Order            Filed By: Plaintiff Lee, Ton Vinh  <i>Notice Of Entry Of Order Denying Defendants' Motion To Dismiss</i></p>
11/02/2015	<p> Opposition to Motion            Filed By: Plaintiff Lee, Ton Vinh  <i>Plaintiff's Opposition To Defendants' Special Motion To Dismiss Pursuant To NRS 41.635-70, Or In The Alternative Motion To Dismiss Pursuant To NRS 12(B)(5)</i></p>
11/12/2015	<p> Reply            Filed by: Cross Claimant Patin, Ingrid  <i>Reply to Plaintiff's Opposition to Defendants' Special Motion to Dismiss Pursuant to Nevada Revised Statute 41.635-70, Or In The Alternative Motion to Dismiss Pursuant to NRS 12(b)(5)</i></p>
11/16/2015	<p> Motion to Strike            Filed By: Plaintiff Lee, Ton Vinh  <i>Plaintiff's Motion To Strike Defendants' Reply In Support Of Special Motion To Dismiss; Or In The Alternative Plaintiff's Motion To Continue Hearing On Order Shortening Time</i></p>











# CASE SUMMARY

CASE NO. A-15-723134-C

11/17/2015	 Reply to Opposition Filed by: Plaintiff Lee, Ton Vinh <i>Plaintiff's Sur-Reply in Opposition to Defendant's Special Motion to Dismiss</i>
11/25/2015	 Supplemental Filed by: Plaintiff Lee, Ton Vinh <i>Supplement To Plaintiff's Sur-Reply In Opposition To Defendants' Special Motion To Dismiss</i>
01/27/2016	 Motion to Dismiss Filed By: Cross Claimant Patin, Ingrid <i>Defendants' Motion to Dismiss Pursuant to NRCP 12(b)(5)</i>
02/04/2016	 Order Denying Filed By: Plaintiff Lee, Ton Vinh <i>Order Denying Defendants' Special Motion to Dismiss Pursuant to NRS 41.635-70, or in the Alternative, Motion to Dismiss Pursuant to NRCP 12(b)(5)</i>
02/04/2016	 Notice of Entry of Order Filed By: Plaintiff Lee, Ton Vinh <i>Notice Of Entry Of Order Denying Defendants' Special Motion To Dismiss Pursuant To NRS 41.635-70, Or In The Alternative, Motion To Dismiss Pursuant To NRCP 12(B)(5)</i>
02/05/2016	 Motion to Strike Filed By: Plaintiff Lee, Ton Vinh <i>Plaintiff's Motion To Strike Defendants' Third-Filed Motion To Dismiss Pursuant To NRCP 12(B)(5) On Order Shortening Time</i>
02/09/2016	 Opposition to Motion Filed By: Cross Claimant Patin, Ingrid <i>Defendants' Opposition to Plaintiff's Motion to Strike Defendants' Third-Filed Motion to Dismiss Pursuant to NRCP 12(b)(5) on Order Shortening Time</i>
02/09/2016	 Reply in Support Filed By: Plaintiff Lee, Ton Vinh <i>Plaintiff's Reply in Support of Motion to Strike Defendants' Third-Filed Motion to Dismiss Pursuant to NRCP, 12(B)(5) on Order Shortening Time</i>
02/22/2016	 Motion to Reconsider Filed By: Cross Claimant Patin, Ingrid <i>Defendants' Motion for Reconsideration</i>
02/23/2016	 Amended Complaint Filed By: Plaintiff Lee, Ton Vinh <i>First Amended Complaint</i>
02/23/2016	 Opposition to Motion to Dismiss Filed By: Plaintiff Lee, Ton Vinh <i>Plaintiff's Opposition To Defendants' Motion To Dismiss</i>
02/29/2016	 Order Filed By: Plaintiff Lee, Ton Vinh <i>Order Denying Plaintiff's Motion to Strike Defendants' Third-Filed Motion to Dismiss Pursuant to NRCP 12(B)(5) on Order Shortening Time</i>

# CASE SUMMARY

CASE NO. A-15-723134-C

03/01/2016	 Notice of Entry of Order Filed By: Cross Defendant Patin Law Group PLLC <i>Notice of Entry of Order</i>
03/02/2016	 Reply to Opposition Filed by: Cross Claimant Patin, Ingrid <i>Defendant's Reply to Plaintiff's Opposition to Defendant's [sic] Motion to Dismiss Pursuant to NRCP 12(b)(5)</i>
03/04/2016	 Notice of Appeal Filed By: Cross Claimant Patin, Ingrid <i>Notice of Appeal</i>
03/04/2016	 Case Appeal Statement Filed By: Cross Claimant Patin, Ingrid <i>Case Appeal Statement</i>
03/11/2016	 Opposition Filed By: Plaintiff Lee, Ton Vinh <i>Plaintiff's Opposition to Defendants' Motion for Reconsideration</i>
03/23/2016	 Reply to Opposition Filed by: Cross Claimant Patin, Ingrid <i>Defendants' Reply to Plaintiff's Opposition to Defendant's Motion for Reconsideration</i>
04/11/2016	 Order Filed By: Plaintiff Lee, Ton Vinh <i>Order Denying Defendants' Motion To Dismiss Pursuant To NRCP 12(B)(5)</i>
04/11/2016	 Second Amended Complaint Filed By: Plaintiff Lee, Ton Vinh <i>Second Amended Complaint</i>
04/11/2016	 Notice of Entry of Order Filed By: Plaintiff Lee, Ton Vinh <i>Notice of Entry of Order Denying Defendants' Motion to Dismiss Pursuant to NRCP 12 (B)(5)</i>
04/22/2016	 Motion to Stay Filed By: Cross Claimant Patin, Ingrid <i>Motion for Stay Pending Appeal on Order Shortening Time</i>
05/02/2016	 Motion Filed By: Cross Claimant Patin, Ingrid <i>Defendants' Motion for Enlargement of Time to Respond to Plaintiff's Second Amended Complaint on an Order Shortening Time</i>
05/03/2016	 Opposition Filed By: Plaintiff Lee, Ton Vinh <i>Plaintiff's Opposition to Defendants' Motion for Stay Pending Appeal on Order Shortening Time</i>
05/09/2016	 Opposition to Motion Filed By: Plaintiff Lee, Ton Vinh <i>Plaintiff's Opposition To Defendants' Motion For Enlargement Of Time To Respond To</i>

# CASE SUMMARY

CASE NO. A-15-723134-C

*Plaintiff's Second Amended Complaint On An Order Shortening Time*

05/12/2016



Order

Filed By: Cross Claimant Patin, Ingrid

*Order Partially Granting and Partially Denying Defendant's Motion for Stay Pending Appeal*

05/16/2016



Notice of Entry of Order

Filed By: Cross Claimant Patin, Ingrid

*Notice of Entry of Order*

05/24/2016



Motion to Dismiss

Filed By: Cross Claimant Patin, Ingrid

*Defendants' Renewed Special Motion to Dismiss Pursuant to Nevada Revised Statutes 41.635-70*

06/13/2016



Opposition

Filed By: Plaintiff Lee, Ton Vinh

*Plaintiff's Opposition to Defendants' "Renewed" Special Motion to Dismiss Pursuant To NRS 41.635-70*

06/22/2016



Reply to Opposition

Filed by: Cross Claimant Patin, Ingrid

*Defendants' Reply to Plaintiff's Opposition to Renewed Special Motion to Dismiss Pursuant to Nevada Revised Statutes 41.635-70*

09/07/2016



Substitution of Attorney

Filed by: Plaintiff Lee, Ton Vinh

*Substitution of Counsel*

09/29/2016



Notice of Entry

Filed By: Plaintiff Lee, Ton Vinh

*Notice of Entry of Order Denying Defendants' Renewed Special Motion to Dismiss Pursuant to Nevada Revised Statutes 41.635-70*

09/29/2016



Order Denying Motion

Filed By: Plaintiff Lee, Ton Vinh

*Order Denying Defendants' Renewed Special Motion to Dismiss Pursuant to Nevada Revised Statute 41.635-70*

10/06/2016



Substitution of Attorney

Filed by: Cross Claimant Patin, Ingrid

*Substitution of Counsel*

10/07/2016



Answer and Crossclaim

Filed By: Cross Claimant Patin, Ingrid

*Defendant, Ingrid Patin's Answer to Plaintiff's Second Complaint and Counterclaim against Patin Law Group, PLLC*

10/18/2016



Answer

Filed By: Cross Defendant Patin Law Group PLLC

*Defendant Patin Law Group, PLLC's Answer to Plaintiff's Second Amended Complaint And Defendant Ingrid Patin's Crossclaim*

10/28/2016



Amended Case Appeal Statement

Party: Cross Claimant Patin, Ingrid

# CASE SUMMARY

CASE NO. A-15-723134-C

## Amended Case Appeal Statement

01/05/2017	 Amended Notice of Appeal Party: Cross Claimant Patin, Ingrid <i>Amended Notice of Appeal</i>
02/01/2017	 Recorders Transcript of Hearing <i>Recorder's Transcript Re: Defendant's Renewed Special Motion to Dismiss Pursuant to Nevada Revised Statutes 41.635.70 - Wednesday, August 10, 2016</i>
02/10/2017	 Motion for Summary Judgment Filed By: Cross Claimant Patin, Ingrid <i>Defendant, Ingrid Patin's Motion for Summary Judgment</i>
02/13/2017	 Recorders Transcript of Hearing <i>Recorder's Transcript Re: Defendants' Renewed Special Motion to Dismiss Pursuant to Nevada Revised Statutes 41.635-70 or, in the Alternative, Motion to Dismiss Pursuant to NRS 12 (b) (5)</i>
02/13/2017	 Recorders Transcript of Hearing <i>Recorder's Transcript Re: Defendants' Special Motion to Dismiss Pursuant to Nevada Revised Statute 41.635-70 or, in the Alternative, Motion to Dismiss Pursuant to NRS 12 (b) (5); Plaintiff's Motion to Strike Defendants' Reply in Support of Special Motion to Dismiss or, in the Alternative, Plaintiff's Motion to Continue Hearing on Order Shortening Time - Wednesday, November 18, 2015</i>
02/13/2017	 Recorders Transcript of Hearing <i>Recorder's Transcript Re: Defendants' Renewed Special Motion to Dismiss Pursuant to Nevada Revised Statutes 41.635-70 - Wednesday, July 20, 2016</i>
02/13/2017	 Errata Filed By: Cross Claimant Patin, Ingrid <i>Errata to Defendant, Ingrid Patin's Motion for Summary Judgment</i>
02/15/2017	 Joinder Filed By: Cross Defendant Patin Law Group PLLC <i>Defendant Patin Law Group, Plc's Joinder To Motion For Summary Judgment And Errata To Motion For Summary Judgment</i>
02/16/2017	 Initial Appearance Fee Disclosure Filed By: Cross Defendant Patin Law Group PLLC <i>DEFENDANT PATIN LAW GROUP, PLLC'S INITIAL APPEARANCE FEE DISCLOSURE</i>
03/02/2017	 Opposition Filed By: Plaintiff Lee, Ton Vinh <i>Plaintiff Ton Vinh Lee's Opposition to Defendant Ingrid Patin's Motion for Summary Judgment and Joinders Thereto</i>
03/08/2017	 Reply to Opposition Filed by: Cross Claimant Patin, Ingrid <i>Defendant Ingrid Patin's Reply to Plaintiff's Opposition to Motion for Summary Judgment</i>
03/15/2017	 Notice of Department Reassignment <i>Notice of Department Reassignment</i>

# CASE SUMMARY

CASE NO. A-15-723134-C

03/22/2017	 Stipulation and Order Filed by: Cross Claimant Patin, Ingrid <i>Stipulation and Order to Continue Hearing to May 9, 2017</i>
03/22/2017	 Notice of Entry of Stipulation and Order Filed By: Cross Claimant Patin, Ingrid <i>Notice of Entry of Stipulation and Order</i>
05/25/2017	 NV Supreme Court Clerks Certificate/Judgment - Dismissed <i>Nevada Supreme Court Clerk's Certificate Judgment - Dismissed</i>
05/30/2017	 Initial Appearance Fee Disclosure <i>Initial Appearance Fee Disclosure</i>
05/30/2017	 Motion for Summary Judgment Filed By: Cross Claimant Patin, Ingrid <i>Defendant Ingrid Patin's Motion for Summary Judgment</i>
05/31/2017	 Joinder to Motion For Summary Judgment Filed By: Cross Defendant Patin Law Group PLLC <i>Defendant Patin Law Group, PLLC's Joinder to Motion for Summary Judgment</i>
06/02/2017	 Order Denying Motion Filed By: Plaintiff Lee, Ton Vinh <i>Order Denying Defendant Ingrid Patin's Motion for Summary Judgment</i>
06/05/2017	 Notice of Entry of Order Filed By: Plaintiff Lee, Ton Vinh <i>Notice of Entry of Order Denying Defendant Ingrid Patin's Motion for Summary Judgment</i>
06/09/2017	 Recorders Transcript of Hearing Party: Cross Claimant Patin, Ingrid; Cross Defendant Patin Law Group PLLC <i>Recorder's Transcript of Proceeding: All Pending Motions, Tuesday, May 9, 2017</i>
06/16/2017	 Opposition and Countermotion Filed By: Plaintiff Lee, Ton Vinh <i>Plaintiff Ton Vinh Lee's Opposition to Defendant Ingrid Patin's Motion for Summary Judgment and Joinders Thereto; Countermotion to Stay Litigation</i>
07/03/2017	 Reply to Opposition Filed by: Cross Claimant Patin, Ingrid <i>Defendant Ingrid Patin's Reply to Plaintiff's Opposition to Motion for Summary Judgment and Opposition to Plaintiff's Countermotion to Stay Litigation</i>
07/06/2017	 Reply in Support Filed By: Plaintiff Lee, Ton Vinh <i>Plaintiff Ton Vinh Lee's Reply in Support of Courtermotion to Stay Litigation</i>
07/26/2017	 Motion to Stay Filed By: Plaintiff Lee, Ton Vinh <i>Plaintiff Ton VinhLee's Motion to Stay Litigation Pending Appeal Pursuant to NRAP 8(a) On Order Shortening Time</i>
08/08/2017	 Notice of Firm Name Change

# CASE SUMMARY

CASE NO. A-15-723134-C

Filed By: Cross Defendant Patin Law Group PLLC  
*Notice of Firm Name Change*

08/10/2017



Order Granting Motion

Filed By: Plaintiff Lee, Ton Vinh  
*Order Granting Plaintiff's Motion to Stay Litigation*

08/10/2017

Order to Stay Proceedings

08/14/2017



Notice of Entry of Order

Filed By: Plaintiff Lee, Ton Vinh  
*Notice of Entry of Order Granting Plaintiff's Motion to Stay Litigation*

08/17/2017



Order Denying Motion

Filed By: Plaintiff Lee, Ton Vinh  
*Order Denying Defendant Ingrid Patin's Motion for Summary Judgment*

08/17/2017



Notice of Entry of Order

Filed By: Plaintiff Lee, Ton Vinh  
*Notice of Entry of Order Denying Defendant Ingrid Patin's Motion for Summary Judgment*

06/12/2018



ADR - Action Required

*ADR - Action Required*

12/14/2018



NV Supreme Court Clerks Certificate/Judgment - Affirmed

*Nevada Supreme Court Clerk's Certificate/Remittitur Judgment - Affirmed*

12/14/2018



Notice of Firm Name Change

Filed By: Cross Claimant Patin, Ingrid  
*Notice of Firm Name Change*

12/14/2018



Order

*Order Setting Status Check Post Appeal*

02/04/2019



Order

*Order Lifting Stay of Litigation*

02/05/2019



Notice of Entry of Order

*Notice of Entry of Order*

02/08/2019



Request for Exemption From Arbitration

*Plaintiff's Request for Exemption from Arbitration*

02/15/2019



Opposition to Request for Exemption

Filed by: Cross Claimant Patin, Ingrid; Cross Defendant Patin Law Group PLLC  
*Defendants' Opposition to Plaintiff's Request for Exemption from Arbitration*

02/20/2019



Reply to Opposition to Request for Exemption

*Plaintiff's Reply in Support of Request for Exemption from Arbitration*

04/23/2019



Order

*Rule 16 Conference Court Order*

# CASE SUMMARY

CASE NO. A-15-723134-C

04/25/2019	 Commissioners Decision on Request for Exemption - Granted <i>Commissioner's Decision on Request for Exemption - GRANTED</i>
04/30/2019	 Objection to Commissioner's Decision on Request for Exemptio Filed by: Cross Claimant Patin, Ingrid <i>Defendants' Objection to Commissioner's Decision on Request for Exemption from Arbitration</i>
06/03/2019	 Order <i>Order on Objection to Commissioner's Decision Regarding Arbitration Exemption</i>
06/13/2019	 Reply to Opposition to Request for Exemption <i>Plaintiff's Response to Defendant's Objection to Commissioner's Decision on Request for Exemption from Arbitration</i>
07/03/2019	 Order <i>Order Denying Defendant's Objection to Commissioner's Decision on Request for Exemption from Arbitration</i>
07/03/2019	 Notice of Entry of Order <i>Notice of Entry of Order</i>
07/15/2019	 Motion to Dismiss Filed By: Cross Claimant Patin, Ingrid <i>Defendants' Motion to Dismiss pursuant to NRCP 16.1(e)(1)</i>
07/15/2019	 Notice <i>Notice of Early Case Conference</i>
07/15/2019	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
07/16/2019	 Objection Filed By: Cross Claimant Patin, Ingrid <i>Defendants' Objection to Notice of Early Case Conference</i>
07/26/2019	 Notice <i>Amended Notice of Early Case Conference</i>
07/29/2019	 Opposition to Motion to Dismiss Filed By: Plaintiff Lee, Ton Vinh <i>Plaintiff Ton Vinh Lee's Opposition to Defendants' Motion to Dismiss Pursuant to NRCP 16.1 (E)(1) and Countermotion for NRCP 11 Sanctions</i>
08/13/2019	 Reply to Opposition Filed by: Cross Claimant Patin, Ingrid <i>Defendants' Reply to Plaintiff's Opposition to Defendants' Motion to Dismiss Pursuant to NRCP 16.1(e)(1) and Opposition to Plaintiff's Countermotion for NRCP 11 Sanctions</i>
09/05/2019	 Substitution of Attorney Filed by: Cross Defendant Patin Law Group PLLC <i>Substitution of Counsel</i>
09/09/2019	 Notice

# CASE SUMMARY

CASE NO. A-15-723134-C

*Second Amended Notice of Early Case Conference*

09/10/2019	 Order <i>Order Denying Defendants' Motion to Dismiss Pursuant to NRCP 16.1(e)(1)</i>
09/10/2019	 Notice of Entry of Order <i>Notice of Entry of Order</i>
09/24/2019	 Motion to Strike Filed By: Cross Claimant Patin, Ingrid <i>Defendant Ingrid Patin's Objection and Motion to Strike Notice of Entry of Order Denying Defendant's Motion to Dismiss</i>
09/24/2019	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
09/24/2019	 Notice Filed By: Cross Claimant Patin, Ingrid <i>Defendant Ingrid Patin's Notice of Withdrawal of Objection and Motion to Strike Notice of Entry of Order Denying Defendant's Motion to Dismiss</i>
10/11/2019	 Joint Case Conference Report <i>Joint Case Conference Report</i>
10/14/2019	 Mandatory Rule 16 Conference Order <i>Mandatory Rule 16 Conference Order</i>
11/19/2019	 Demand for Jury Trial Filed By: Cross Claimant Patin, Ingrid <i>Defendant Ingrid Patin's Demand for Jury Trial</i>
12/06/2019	 Scheduling and Trial Order <i>Civil Non-Jury Trial Order</i>
12/09/2019	 Scheduling and Trial Order <i>Civil Jury Trial Order</i>
12/10/2019	 Scheduling and Trial Order <i>Corrected Scheduling Order and Order Setting Civil Jury Trial</i>
01/30/2020	 Motion to Compel Filed By: Cross Claimant Patin, Ingrid <i>Defendant Ingrid Patin's Motion to Compel Plaintiff's Computation of Damages</i>
01/30/2020	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
02/13/2020	 Opposition to Motion to Compel Filed By: Plaintiff Lee, Ton Vinh <i>Plaintiff Ton Vinh Lee's Opposition To Defendants' Motion To Compel</i>
02/13/2020	 Opposition to Motion to Compel Filed By: Plaintiff Lee, Ton Vinh



# CASE SUMMARY

CASE NO. A-15-723134-C

*Plaintiff Ton Vinh Lee's Opposition To Defendants' Motion To Compel*

02/13/2020



Errata

Filed By: Plaintiff Lee, Ton Vinh

*Errata to Plaintiff Ton Vinh Lee's Opposition to Defendants Motion to Compel.*

02/26/2020



Reply to Opposition

Filed by: Cross Claimant Patin, Ingrid

*Defendant Ingrid Patin's Reply to Plaintiff's Opposition to Defendant's Motion to Compel Plaintiff's Computation of Damages*

03/26/2020



Discovery Commissioners Report and Recommendations

*Discovery Commissioner s Report and Recommendations -Originals*

04/14/2020



Order Approving

Filed By: Cross Claimant Patin, Ingrid

*Order Re: Discovery Commissioner's Report and Recommendations*

04/30/2020



Stipulation and Order

*Extend Deadline for Compliance*

06/16/2020



Motion

Filed By: Plaintiff Lee, Ton Vinh

*Motion to Extend Discovery Deadline -- First Request*

06/17/2020



Clerk's Notice of Hearing

*Notice of Hearing*

06/30/2020



Notice of Entry of Order

Filed By: Cross Claimant Patin, Ingrid

*Notice of Entry of Order re: Discovery Commissioner's Report and Recommendations*

06/30/2020



Opposition to Motion

Filed By: Cross Claimant Patin, Ingrid

*Defendant Ingrid Patin's Opposition to Plaintiff's Motion to Extend Discovery Deadlines*

07/07/2020



Joinder

Filed By: Cross Defendant Patin Law Group PLLC

*DEFENDANT'S PATIN LAW GROUP, PLLC'S JOINDER TO DEFENDANT INGRID PATIN'S OPPOSITION TO PLAINTIFF'S MOTION TO EXTEND DISCOVERY DEADLINES*

07/08/2020



Recorders Transcript of Hearing

*Recorders Transcript of Hearing - Defendant Ingrid Patin's Motion to Compel Plaintiff's Computation of Damages - heard on Mar. 3, 2020*

07/23/2020



Opposition to Motion

Filed By: Cross Claimant Patin, Ingrid

*Defendant Ingrid Patin's Supplemental Opposition to Plaintiff's Motion to Extend Discovery Deadlines and Request for Sanctions*

07/28/2020



Reply in Support

*Plaintiff's Reply in Support of Motion to Extend Discovery -- First Request*

07/29/2020



Notice of Hearing

# CASE SUMMARY

CASE NO. A-15-723134-C

*Instructions for Bluejeans Videoconference*

07/31/2020



Motion to Strike

Filed By: Plaintiff Lee, Ton Vinh

*(8/13/20 Withdrawn) Plaintiff Ton Vinh Lee's Motion to Strike Defendant Ingrid Patin's Supplemental Opposition to Plaintiff's Motion to Extend Discovery Deadlines and Request for Sanctions*

08/03/2020



Clerk's Notice of Hearing

*Notice of Hearing*

08/04/2020



Notice of Hearing

*Instructions for Bluejeans Videoconference*

08/04/2020



Joinder

Filed By: Cross Defendant Patin Law Group PLLC

*Defendant Patin Law Group, PLLC's Joinder to Defendant Ingrid Patin's Supplemental Opposition to Plaintiff's Motion to Extend Discovery Deadlines*

08/07/2020



Motion for Summary Judgment

Filed By: Cross Claimant Patin, Ingrid

*Defendant Ingrid Patin's Motion for Judgment on the Pleadings, in the Alternative, Motion for Summary Judgment*

08/10/2020



Joinder

Filed By: Cross Defendant Patin Law Group PLLC

*Defendant Patin Law Group, PLLC's Joinder to Defendant Ingrid Patin's Motion for Judgement on the Pleadings, in the Alternative, Motion for Summary Judgement*

08/10/2020



Clerk's Notice of Hearing

*Notice of Hearing*

08/13/2020



Notice of Withdrawal

Filed by: Plaintiff Lee, Ton Vinh

*Notice of Withdrawal of Plaintiff Ton Vinh Lee's Motion to Strike Defendant Ingrid Patin's Supplemental Opposition to Plaintiff's Motion to Extend Discovery Deadlines*

08/18/2020



Designation of Expert Witness

*Plaintiff's Designation of Expert Witness*

08/19/2020



Application

Filed By: Cross Claimant Patin, Ingrid

*APPLICATION FOR COMMISSION TO TAKE OUT-OF-STATE DEPOSITION*

08/19/2020



Commission Issued

Filed by: Cross Claimant Patin, Ingrid

*COMMISSION TO TAKE OUT-OF STATE DEPOSITION*

08/20/2020



Order Granting Motion

Filed By: Plaintiff Lee, Ton Vinh

*Order Granting Plaintiff's Motion to Extend Discovery Deadlines First Request*

08/21/2020



Notice of Entry of Order

Filed By: Plaintiff Lee, Ton Vinh

# CASE SUMMARY

CASE NO. A-15-723134-C

## Notice of Entry of Order

08/26/2020



### Opposition to Motion

Filed By: Plaintiff Lee, Ton Vinh

*Plaintiff Ton Vinh Lee's Opposition to Defendant Ingrid Patin's Motion for Judgment on the Pleadings, in the Alternative, Motion for Summary Judgment*

09/08/2020



### Reply to Opposition

Filed by: Cross Claimant Patin, Ingrid

*Defendant Ingrid Patin's Reply to Plaintiff's Opposition to Defendant Ingrid Patin's Motion for Judgment on the Pleadings, in the Alternative, Motion for Summary Judgment*

09/09/2020



### Joinder

Filed By: Cross Defendant Patin Law Group PLLC

*Defendant Patin Law Group, PLLC's Joinder to Defendant Ingrid Patin's Motion for Judgement on the Pleadings, in the Alternative, Motion for Summary Judgement*

09/09/2020



### Clerk's Notice of Hearing

*Notice of Hearing*

09/10/2020



### Notice of Hearing

*Instructions for Bluejeans Videoconference Hearing*

10/28/2020



### Order

*Order Granting Defendant Patin's Motion for Summary Judgment and Patin Law Group's Joinder*

10/30/2020



### Notice of Entry of Order

Filed By: Cross Claimant Patin, Ingrid

*Notice of Entry of Order granting Defendant Patin's Motion for Summary Judgment and Patin Law Group's Joinder*

11/13/2020



### Motion to Reconsider

Filed By: Plaintiff Lee, Ton Vinh

*Plaintiff Ton Vinh Lee's Motion for Reconsideration of the Court's Order Granting Defendant Ingrid Patin's Motion for Summary Judgment*

11/16/2020



### Clerk's Notice of Hearing

*Notice of Hearing*

11/19/2020



### Motion for Attorney Fees and Costs

Filed By: Cross Claimant Patin, Ingrid

*Defendant Ingrid Patin's Motion for Attorneys' Fees, Costs and Interest*

11/19/2020



### Motion for Attorney Fees and Costs

Filed By: Cross Defendant Patin Law Group PLLC

*DEFENDANT PATIN LAW GROUP, PLLC S MOTION FOR ATTORNEYS FEES AND INTEREST*

11/20/2020



### Clerk's Notice of Hearing

*Notice of Hearing*

11/20/2020



### Clerk's Notice of Hearing

*Notice of Hearing*

# CASE SUMMARY

CASE NO. A-15-723134-C

11/24/2020	 Motion to Reconsider Filed By: Plaintiff Lee, Ton Vinh <i>Plaintiff Ton Vinh Lee S Motion To Alter Or Amend Judgment Pursuant To NRCP 59(e)</i>
11/25/2020	 Opposition to Motion Filed By: Cross Claimant Patin, Ingrid <i>Defendant Ingrid Patin's Opposition to Plaintiff's Motion for Reconsideration of the Court's Order Granting Defendant's Motion for Summary Judgment</i>
11/30/2020	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
12/01/2020	 Joinder Filed By: Cross Defendant Patin Law Group PLLC <i>Defendant Patin Law Group, PLLC's Joinder to Defendant Ingrid Patin's Opposition to Plaintiff's Motion for Reconsideration of the Court's Order Granting Defendant's Motion for Summary Judgement</i>
12/03/2020	 Opposition <i>Plaintiff's Opposition to Defendant Ingrid Patin's Motion for Attorneys' Fees</i>
12/03/2020	 Opposition <i>Plaintiff's Opposition to Defendant Patin Law Group's Motion for Attorney's Fees</i>
12/08/2020	 Opposition to Motion Filed By: Cross Claimant Patin, Ingrid <i>Defendant Ingrid Patin's Opposition to Plaintiff's Motion to Alter or Amend Judgment Pursuant to NRCP 59(e)</i>
12/09/2020	 Joinder Filed By: Cross Defendant Patin Law Group PLLC <i>Defendant Patin Law Group, PLLC's Joinder to Defendant Ingrid Patin's Opposition to Plaintiff's Motion to Alter or Amend Judgement Pursuant to NRCP 59(e)</i>
12/09/2020	 Supplement Filed by: Cross Defendant Patin Law Group PLLC <i>Defendant Patin Law Group, PLLC's Supplement to Motion for Attorneys' Fees and Interests</i>
12/29/2020	 Reply Filed by: Cross Claimant Patin, Ingrid <i>Defendant Ingrid Patin's Reply to Plaintiff's Opposition to Defendant Ingrid Patin's Motion for Attorney's Fees, Costs and Interest</i>
12/29/2020	 Notice of Hearing <i>Instructions for Bluejeans Videoconference</i>
12/29/2020	 Reply Filed by: Cross Defendant Patin Law Group PLLC <i>Defendant Patin Law Group, Plc's Reply to Plaintiff's Opposition to Defendant Patin Law Group, Plc's Motion for Attorneys' Fees and Interest</i>
12/30/2020	 Reply in Support Filed By: Plaintiff Lee, Ton Vinh <i>Plaintiff Ton Vinh Lee's Reply in Support of Motion to Alter or Amend Judgment Pursuant to</i>

# CASE SUMMARY

CASE NO. A-15-723134-C

NRCP 59(e)

12/30/2020



Reply in Support

Filed By: Plaintiff Lee, Ton Vinh

*Plaintiff Ton Vinh Lee's Reply in Support of Motion for Reconsideration*

01/14/2021



Recorders Transcript of Hearing

Party: Plaintiff Lee, Ton Vinh

*Recorder's Transcript of Pending Motions, Tuesday, September 15, 2020*

01/21/2021



Order Denying Motion

Filed By: Cross Claimant Patin, Ingrid

*Order Denying Plaintiff's Motion to Alter/ Amend Judgment and Order continuing Plaintiff's Motion for Reconsideration, Defendant Ingrid Patin's Motions for Fees, Cost, and Interest and Defendant Patin Law Group, PLLC's Motion for Attorneys Fees and Interest*

01/21/2021



Notice of Entry of Order

Filed By: Cross Claimant Patin, Ingrid

*Notice of Entry of Order*

02/02/2021



Notice of Hearing

*Instructions for Bluejeans Videoconference*

02/03/2021



Supplement

Filed by: Plaintiff Lee, Ton Vinh

*Plaintiff Ton Vinh Lee's Supplemental Opposition to Defendant Ingrid Patin's Motion for Attorneys Fees and Cost, and Interest*

02/03/2021



Supplement

Filed by: Plaintiff Lee, Ton Vinh

*Plaintiff Ton Vinh Lee's Supplemental Opposition to Defendant Patin Law Group's Motion for Attorneys Fees and Interest*

02/18/2021



Notice of Appeal

*Notice of Appeal*

02/18/2021



Case Appeal Statement

*Case Appeal Statement*

## **DISPOSITIONS**

04/11/2016

**Order of Dismissal** (Judicial Officer: Togliatti, Jennifer)

Debtors: Ingrid Patin (Defendant), Patin Law Group PLLC (Defendant)

Creditors: Ton Vinh Lee (Plaintiff)

Judgment: 04/11/2016, Docketed: 04/18/2016

Comment: Certain Claims

05/25/2017

**Clerk's Certificate** (Judicial Officer: Sturman, Gloria)

Debtors: Ingrid Patin (Defendant), Patin Law Group PLLC (Defendant)

Creditors: Ton Vinh Lee (Plaintiff)

Judgment: 05/25/2017, Docketed: 06/01/2017

Comment: Supreme Court No. 72144 APPEAL DISMISSED

12/14/2018

**Clerk's Certificate** (Judicial Officer: Sturman, Gloria)

Debtors: Ingrid Patin (Defendant), Patin Law Group PLLC (Defendant)

Creditors: Ton Vinh Lee (Plaintiff)

Judgment: 12/14/2018, Docketed: 12/21/2018

Comment: APPEAL AFFIRMED Supreme Court No. 69928

# CASE SUMMARY


CASE NO. A-15-723134-C

10/28/2020

**Summary Judgment** (Judicial Officer: Sturman, Gloria)  
Debtors: Ton Vinh Lee (Plaintiff)  
Creditors: Ingrid Patin (Defendant), Patin Law Group PLLC (Defendant)  
Judgment: 10/28/2020, Docketed: 10/29/2020

## HEARINGS


10/14/2015

 **Motion to Dismiss** (9:00 AM) (Judicial Officer: Togliatti, Jennifer)

*Defendants' Motion to Dismiss*  
Dismissed Without Prejudice;  
Journal Entry Details:

*Court made a record of all documents reviewed. Ms. Morris advised an anti-slap law may also be applicable and noted the bar complaint has been dealt with. Court advised it does not think professional conduct is relevant and the motion is really a Motion for Summary Judgment. Court reviewed the statement made and noted the verdict was against a dba, which is not a legal entity. Court requested information as to who owns the dba corporation. Ms. Morris advised she can get the information from the Secretary of State, noting that she believes Summerlin Smiles is owned by Ton V. Lee. Colloquy regarding the owner. Mr. Jones argued there is no verdict against his client as it was vacated by the Judge, although it is on appeal. Court made a record of Exhibit B and the 12 page order it has reviewed. Colloquy regarding the documenting statement. Mr. Jones objected to the statement of facts since they did not have an opportunity to respond. COURT ORDERED, motion DENIED WITHOUT PREJUDICE, noting any further motions must be re-filed. Further, Court noted if the Motion is treated as a Motion for Summary Judgment the motion is denied 56F. Mr. Jones to prepare the order and submit to opposing counsel prior to final submission to the Court.;*

11/18/2015

 **Motion to Dismiss** (9:00 AM) (Judicial Officer: Togliatti, Jennifer)

**11/18/2015, 12/02/2015**

*Defendants' Special Motion to Dismiss Pursuant to Nevada Revised Statute 41.635-70 or in the Alternative Motion to Dismiss Pursuant to NRS 12(b)(5)*  
Continued;  
Under Advisement;  
Journal Entry Details:

*Also present: Edward Wynder, Esq. on behalf of Defendant. Ms. Morris argued in support of the motion, noting that the statement is accurate. Further, Ms. Morris argued that it is free speech and an issue for public concern. Ms. Morris advised the Plaintiff must prove a false and defamatory statement and they cannot prove damages. With respect to the Motion to Dismiss, Ms. Morris argued that Ton V. Lee DDS is the owner of Summerlin Smiles and the statement in the advertisement is factually correct. Mr. Jones argued there is no verdict for the Plaintiff. Upon Court's inquiry, Mr. Jones advised the Plaintiff filed a counter appeal for fees and costs only, not for any verdict unless the Nevada Supreme Court reverses the Judge's ruling. Mr. Jones further argued against the motion noting the statement is defamatory and that the verdict as vacated. Further argument by counsel. COURT ORDERED, matter UNDER ADVISEMENT and matter SET for status check, noting a minute order will issue. 12/09/15 (CHAMBERS) STATUS CHECK: DECISION;*


Continued;  
Under Advisement;

11/18/2015

**Motion to Strike** (9:00 AM) (Judicial Officer: Togliatti, Jennifer)

*Plaintiff's Motion To Strike Defendants' Reply In Support Of Special Motion To Dismiss; Or In The Alternative Plaintiff's Motion To Continue Hearing On Order Shortening Time*  
Granted in Part;

11/18/2015

 **All Pending Motions** (9:00 AM) (Judicial Officer: Togliatti, Jennifer)

Matter Heard;  
Journal Entry Details:

*DEFENDANTS' SPECIAL MOTION TO DISMISS PURSUANT TO NEVADA REVISED STATUTE 41.635-70 OR IN THE ALTERNATIVE MOTION TO DISMISS PURSUANT TO NRS 12(B)(5) ... PLAINTIFF'S MOTION TO STRIKE DEFENDANTS' REPLY IN SUPPORT OF SPECIAL MOTION TO DISMISS; OR IN THE ALTERNATIVE PLAINTIFF'S MOTION TO CONTINUE HEARING ON ORDER SHORTENING TIME* Mr. Jones argued the Plaintiff's

# CASE SUMMARY

CASE NO. A-15-723134-C

*Motion is untimely and argued for the reply to be stricken, noting there are arguments made for the first time in the brief. Ms. Morris argued there are no new facts in the brief. COURT ORDERED, Plaintiff Motion to Strike Defendant's Reply in Support of Special Motion to Dismiss DENIED; Motion to Continued GRANTED to allow a sur-reply to be filed. 12/02/15 9:00 AM DEFENDANTS' SPECIAL MOTION TO DISMISS PURSUANT TO NEVADA REVISED STATUTE 41.635-70 OR IN THE ALTERNATIVE MOTION TO DISMISS PURSUANT TO NRS 12(B)(5);*

12/09/2015



**Status Check (3:00 AM)** (Judicial Officer: Togliatti, Jennifer)

*Decision*

*Continued;*

*Journal Entry Details:*

*COURT ORDERED, matter CONTINUED. CONTINUED TO: 1/13/16 (CHAMBERS);*

01/13/2016



**Status Check (3:00 AM)** (Judicial Officer: Togliatti, Jennifer)

*Minute Order - No Hearing Held;*

*Journal Entry Details:*

*This Court having considered the Defendants Special Motion to Dismiss Pursuant to NRS 41.635-70, or in the Alternative Motion to Dismiss Pursuant to NRS 12(b)(5), all related pleadings, and oral arguments of counsel, first FINDS Defendants Motion is timely filed pursuant to NRS 41.660. Next, this Court FINDS the communication at issue (as detailed by the Plaintiff in his Opposition to this Motion) under the circumstances of the nature, content, and location of the communication is not a good faith communication in furtherance of the right to petition or the right to free speech in direct connection with an issue of public concern. Specifically, NRS 41.637(3) doesn't apply because the communication does not reference an appeal, nor does there appear to be any connection to the communication and its timing to any purpose other than attorney advertising. NRS 41.637(4) does not apply because it appears there is no direct connection to a matter of public interest, and instead it appears to be for the purpose of attorney advertising. However, even if NRS 41.637(3) or (4) did apply to complained of communication, this Court cannot find at this juncture that the Plaintiff has put forth prima facie evidence demonstrating a probability of prevailing on this claim. This is particularly true because the truth or falsity of an allegedly defamatory statement is an issue for the jury to determine. Posadas v. City of Reno, 109 Nev. 448, 453 (1993). Further, because if found to be defamatory and the statement is such that would tend to injure the Plaintiff in his business or profession, then it will be deemed defamation per se and damages will be presumed. Nevada Ind. Broadcasting v. Allen, 99 Nev. 404, 409 (1983). Therefore, for the reasons stated herein Court ORDERS Special Motion to Dismiss pursuant to Nevada's anti-SLAPP laws DENIED. Next, this Court FINDS all of Defendants other arguments are not properly decided in a Motion to Dismiss and/or are without merit and ORDERS Defendants Alternative 12(b)(5) Motion to Dismiss DENIED. Further, this Court DENIES Plaintiff's Countermotion for attorney's fees and costs as this Court does not find the special motion to be frivolous or vexatious. Further, the misstatement of the evidentiary burden cannot be considered more than a harmless error on the part of counsel considering the facts here. Finally, this Court notes that the parties have not in any Motion to Dismiss thus far distinguished between allegations of conduct of the individual Defendant versus the corporate Defendant, and therefore, this Court notes that any rulings herein and regarding the previous Motion to Dismiss do not address that issue. Counsel for the Plaintiff is to prepare the proposed order tracking the language of this minute order and allow for Defendants counsel's signature as to form and content. CLERK'S NOTE: A copy of this Minute Order shall be placed in the Attorney folders for the following: Prescott T. Jones, Esq., August B. Hotchkin, Esq., and Bremer Whyte Brown & O'Meara LLP/pi;*

01/13/2016

**CANCELED Minute Order (1:00 PM)** (Judicial Officer: Barker, David)

*Vacated - On in Error*

02/10/2016



**Motion to Strike (9:30 AM)** (Judicial Officer: Togliatti, Jennifer)

**02/10/2016, 02/16/2016**

*Plaintiff's Motion To Strike Defendants' Third-Filed Motion To Dismiss Pursuant To NRCP 12 (B)(5) On Order Shortening Time*

*Continued;*

*Denied;*

*Journal Entry Details:*

*This Court, having considered the motion to Strike Defendants Third-Filed Motion to Dismiss*



# CASE SUMMARY

CASE NO. A-15-723134-C

Pursuant to NRCP 12(b)(5), the Opposition to the Motion, Reply in Support of Motion, and oral arguments of counsel ORDERS the Motion to Strike DENIED. Further, this Court ORDERS the Defendants Countermotion for Attorney s Fees and Costs DENIED, as the Court does not find that the Motion was filed for the purposes of harassment. Counsel for Defendants is directed to prepare the proposed order for the Court s signature. CLERK'S NOTE: A copy of this minute order has been e-mailed to Prescott Jones, Esq. and Christian Morris, Esq.;

Continued;

Denied;

Journal Entry Details:

Court made a record of all documents reviewed. Mr. Jones argued in support of the motion, noting a subsequent 12(b) motion cannot be filed after the first 12(b) motion was filed.

Further, Mr. Jones moved to strike the Motion to Dismiss and requested the answer be filed.

Ms. Morris argued the motion was filed for a failure to state a claim against the Defendant

individually and there is not a claim against the LLC. Upon Court's inquiry, Ms. Morris

advised the LLC has not answered yet as time has not run out yet. Further argument by

counsel. COURT ORDERED, matter CONTINUED for decision, noting a minute order will

issue. CONTINUED TO: 2/17/16 (CHAMBERS);

03/09/2016



**Motion to Dismiss** (9:00 AM) (Judicial Officer: Togliatti, Jennifer)

03/09/2016, 03/16/2016

Defendants' Motion to Dismiss Pursuant to NRCP 12(b)(5)

Continued;

Denied in Part;

Journal Entry Details:

This Court having considered the Defendant s Motion to Dismiss Pursuant to NRCP 12(b)(5), and the arguments of counsel FINDS that because Defendants have not yet answered there is a

properly filed Amended Complaint on file without leave of the Court which alleges that the

individual Defendant Patin directed the alleged statement be published on the firm website. In

light of the allegations in the Amended Complaint which this Court must accept as true, the

Court ORDERS the Motion to Dismiss DENIED. This Court GRANTS the Motion to Dismiss

as to the alter ego claim as Plaintiff s allegations on information and belief amount to a fishing

expedition and potentially could result in abusive and harassing litigation tactics. Counsel for

the Plaintiff is to prepare an order consistent with these minutes and the minutes for the

hearing date on March 9, 2016. CLERK S NOTE: A copy of this minute order has been e-

mailed to Prescott Jones, Esq. and Christian Morris, Esq. -amt 3/21/16;

Continued;

Denied in Part;

Journal Entry Details:

Argument by Ms. Morris, noting the First Amended Complaint is a rogue document and

cannot be addressed. Mr. Jones argued they are allowed to amend the complaint. Further

arguments by counsel in support of their respective positions. Court noted Mr. Jones has

advised he will only focus on the alleged tortuous acts. COURT Sua Sponte ORDERED Mr.

Jones to file a Second Amended Complaint to remove the allegations of alter ego and noted

that no discovery into the corporate assets, bank accounts, or anything solely related to alter

ego will be allowed. Further, Court noted any language as to personal gain is to be

STRICKEN. COURT ORDERED, Motion CONTINUED to the Court's Chamber Calendar for

decision. CONTINUED TO: 3/16/16 (CHAMBERS);

03/30/2016



**Motion For Reconsideration** (3:00 AM) (Judicial Officer: Togliatti, Jennifer)

Defendants' Motion for Reconsideration

Denied;

Journal Entry Details:

This Court, having considered the Defendants Motion for Reconsideration, all related

pleadings and the record first FINDS that this matter is properly heard on the Court s chamber

calendar without oral argument pursuant to EDCR 2.23. This Court previously found that the

matter was not ripe for 12(b)(5) dismissal. Defendant s Motion for Reconsideration arguing

that this Court s decision is erroneous does not persuade this Court the previous Motion

should have been granted. The allegations in the First Amended Complaint filed 2/23/16, or

the previously filed Complaint, if taken as true as this Court must do pursuant to the case law

on Motions to Dismiss, could state a claim for which relief may be granted. All facts cited by

Defendant, whether supported by affidavit, deposition or judicial notice of facts found in

another case, require this Court to look outside of the Plaintiff s Complaint. Defendant refers

to Exhibits including Exhibits A,B,C, D, H, I, J, K, L, M in support of reconsideration to

address facts outside of the Plaintiff s Complaint, which is why this Court ruled that the issues



# CASE SUMMARY

CASE NO. A-15-723134-C

raised by Defendant are not proper for a Motion to Dismiss or not properly considered in a Motion to Dismiss because the Defendants wish this Court to look outside of Plaintiff's Complaint and dismiss the case based upon facts presented or argued in the Motion to Dismiss. This Court again disagrees with the Defendants position that the Court should review or consider evidence outside, or contradicting, the Complaint and dismiss. Court ORDERS Motion for Reconsideration of Court's Denial of Defendant's Alternative 12(b)(5) Motion to Dismiss DENIED. CLERK'S NOTE: A copy of this minute order has been e-mailed to Prescott Jones, Esq. and Christian Morris, Esq. -amt 4/6/16;

05/04/2016



**Motion For Stay** (3:00 AM) (Judicial Officer: Togliatti, Jennifer)

Defendants' Motion for Stay Pending Appeal on Order Shortening Time

Granted in Part;

Journal Entry Details:

This Court, having considered the Defendant's Motion for Stay and Plaintiff's Opposition GRANTS IN PART and DENIES IN PART Defendant's Motion. NRS 41.660 provides for the mandatory stay of discovery pending disposition of the appeal and therefore the Defendant's Motion to Stay is GRANTED as to discovery. When considering the factors for a stay of the entire litigation, in this Court's view none favor Defendants. First, the object of the appeal will no be defeated. Next, there is no irreparable injury because litigation expenses do not constitute irreparable harm. Here, if the Supreme Court agrees with Defendant's they would recover reasonable costs and attorney's fees from Plaintiff based upon NRS 41.670. Additionally, Plaintiff would face the possibility of up to \$10,000.00 in sanctions against Plaintiff, therefore, any financial impact on Defendant's would be rectified if Defendants are successful on appeal. Therefore, the Motion to Stay the Litigation in it's entirety is DENIED IN PART and only discovery is stayed. CLERK'S NOTE: A copy of this minute order has been e-mailed to Prescott Jones, Esq. and Christian Morris, Esq. -amt 5/4/16;

05/11/2016



**Motion** (3:00 AM) (Judicial Officer: Togliatti, Jennifer)

Defendants' Motion for Enlargement of Time to Respond to Plaintiff's Second Amended Complaint on an Order Shortening Time

Granted;

Journal Entry Details:

This Court, having reviewed the pleadings, notes, the partial stay, and not withstanding Plaintiff's Opposition, there is nominal prejudice to the Plaintiff when considering the statutorily mandated stay of discovery. COURT ORDERS, Motion for Enlargement of Time GRANTED. CLERK'S NOTE: A copy of this minute order has been e-mailed to Prescott Jones, Esq. and Christian Morris, Esq. -amt 5/11/16;

06/29/2016



**Motion to Dismiss** (9:00 AM) (Judicial Officer: Togliatti, Jennifer)

06/29/2016, 07/20/2016, 07/27/2016, 08/10/2016

Defendants' Renewed Special Motion to Dismiss Pursuant to Nevada Revised Statutes 41.635-70

Continued;

Continued for Chambers Decision;

Matter Continued;

Denied;

Journal Entry Details:

The Court noted it is aware of a case that counsel needs to do research on Jacobs vs. Sands A627691. There are Orders in that case that was filed on 11/16/15 with a footnote by Judge Gonzalez where she references decisions being applicable to a subsequent Amended Complaint. The Court believes it was done in this case because the Supreme Court and this very issue that Plt's counsel would suggest is an abusive litigation is exactly what happened in the Jacob vs. Sands case that Judge Gonzales makes reference to in her footnote. COURT ORDERED, MOTION DENIED as it relates to the Amended Complaint. The previous STAY of the Discovery in the case is in force and effect as it relates to the Amended Complaint. Mr. Jones to prepare an Order consistent with the previous Order. ;

Continued;

Continued for Chambers Decision;

Matter Continued;

Denied;

Journal Entry Details:

Court ORDERS counsel to appear August 10, 2016 at the 9:00 a.m. hearing calendar to further address the Court regarding Defendant's Renewed Special Motion to Dismiss Pursuant

# CASE SUMMARY

CASE NO. A-15-723134-C

to Nevada Revised Statutes 41.635-70 and therefore **ORDERS** the Defendant's Motion continued to be heard on that date. **CONTINUED TO: 8/10/16 9:00 AM CLERK'S NOTE:** A copy of this Minute Order was placed in the attorney folder of: Prescott James, Esq. & Christian Morris, Esq. -se8/4/16 ;

Continued;

Continued for Chambers Decision;

Matter Continued;

Denied;

Journal Entry Details:

*Mr. Morris informed the Court they now have a new Complaint. COURT ORDERED, it will issue a minute order next week on the Chambers calendar. 7-27-16 CHAMBERS CALENDAR (DEPT. IX);*

Continued;

Continued for Chambers Decision;

Matter Continued;

Denied;

Journal Entry Details:

*Court advised it was notified that Defense counsel would be requesting a continuance. Colloquy regarding continuance date. COURT ORDERED, matter CONTINUED. CONTINUED TO: 7/20/16 9:00 AM CLERK'S NOTE: A copy of this minute order has been e-mailed to Christian Morris, Esq. and Prescott Jones, Esq. -amt 6/29/16;*

03/14/2017



**Minute Order** (3:00 AM) (Judicial Officer: Togliatti, Jennifer)

Minute Order - No Hearing Held;

Journal Entry Details:

*The Court became aware of the substitution of counsel for Defendant Patin Law Group after beginning review of the Motion for Summary Judgment briefs today, as there have been no motions before Court since the substitution was filed, until the instant Motion for Summary Judgment. As a result of a conflict, tomorrow's hearing is being vacated because this Court must recuse to avoid the appearance of impropriety and implied bias. This is due to a close personal friendship with attorney J. Thompson and his spouse, as well as Paul Larsen and his spouse. In light of this Court's prolonged, recent, and regular social contact with attorneys for Patin Law Group, including but not limited to performing their wedding ceremonies and regular social contact, the Court **RECUSES** and **ORDERS** the matter randomly reassigned. CLERK'S NOTE: A copy of this minute order has been e-mailed to Prescott Jones, Esq. and Paul Larsen, Esq. -amt 3/14/17;*

03/15/2017

**CANCELED Motion for Summary Judgment** (9:00 AM) (Judicial Officer: Togliatti, Jennifer)

*Vacated - per Law Clerk*

*Defendant, Ingrid Patin's Motion for Summary Judgment*

03/15/2017

**CANCELED Joinder** (9:00 AM) (Judicial Officer: Togliatti, Jennifer)

*Vacated - per Law Clerk*

*Defendant Patin Law Group, Plc's Joinder To Motion For Summary Judgment And Errata To Motion For Summary Judgment*

05/09/2017

**Motion for Summary Judgment** (9:30 AM) (Judicial Officer: Sturman, Gloria)

*Defendant, Ingrid Patin's Motion for Summary Judgment*

Denied Without Prejudice; Defendant, Ingrid Patin's Motion for Summary Judgment

05/09/2017

**Joinder** (9:30 AM) (Judicial Officer: Sturman, Gloria)

*Defendant Patin Law Group, Plc's Joinder To Motion For Summary Judgment And Errata To Motion For Summary Judgment*

Denied Without Prejudice; Defendant Patin Law Group, Plc's Joinder To Motion For Summary Judgment And Errata To Motion For Summary Judgment

05/09/2017



**All Pending Motions** (9:30 AM) (Judicial Officer: Sturman, Gloria)

Matter Heard;




Journal Entry Details:

*Ms. Morris indicated that the appeal had been decided by the Supreme Court; the trial jury verdict had been reinstated and has now been paid. That we are here regarding the posting that was made on the website; that there is currently an appeal pending on the issue of anti-*

# CASE SUMMARY

CASE NO. A-15-723134-C

slap; and argued that now that the verdict has been reinstated, the statement was true that there was in fact a verdict in that amount does not state that the verdict was against Ton Vinh Lee, just that he was sued. Court reiterated what the posting stated and indicated it implies a judgment was received against all defendants. Ms. Morris argued it is a question of law if the statement was false and defamatory. Mr. Jones argued the statement to be false; that no discovery has been conducted to date; and the motion is premature. Court questioned whether it was a question for the jury or if more discovery would be necessary. Mr. Jones believes more discovery was needed. Ms. Morris further argued that everything in the statement was absolutely true; that it is plaintiff's burden to show a genuine issue of material fact exists and argued that it is a question of law if there was a defamatory statement. **COURT ORDERED, Motion DENIED WITHOUT PREJUDICE** as premature as there is a partial stay in place and the Court cannot say as a matter of law that the statement is or is not defamatory. Ms. Morris to prepare the Order.;

- 07/11/2017 **Motion for Summary Judgment** (9:30 AM) (Judicial Officer: Sturman, Gloria)  
*Defendant Ingrid Patin's Motion for Summary Judgment*  
Denied Without Prejudice;
- 07/11/2017 **Joinder** (9:30 AM) (Judicial Officer: Sturman, Gloria)  
*Defendant Patin Law Group, PLLC's Joinder to Motion for Summary Judgment*  
Denied Without Prejudice;
- 07/11/2017 **Opposition and Countermotion** (9:30 AM) (Judicial Officer: Sturman, Gloria)  
*Plaintiff Ton Vinh Lee's Opposition to Defendant Ingrid Patin's Motion for Summary Judgment and Joinders Thereto; Countermotion to Stay Litigation*  
Denied Without Prejudice;
- 07/11/2017  **All Pending Motions** (9:30 AM) (Judicial Officer: Sturman, Gloria)  
*Ingrid Patin's Motion for Summary Judgment... Patin Law Group PLLC's Joinder to Motion for Summary Judgment...Pltf Lee's Opp and Countermotion to Stay Litigation*  
Decision Made; Ingrid Patin's Motion for Summary Judgment... Patin Law Group PLLC's Joinder to Motion for Summary Judgment...Pltf Lee's Opp and Countermotion to Stay Litigation  
Journal Entry Details:  
*Ingrid Patin's Motion for Summary Judgment... Patin Law Group PLLC's Joinder to Motion for Summary Judgment...Pltf Lee's Opp and Countermotion to Stay Litigation Following arguments by counsels, COURT ORDERED, Ingrid Patin's Motion for Summary Judgment and all Joinders, DENIED WITHOUT PREJUDICE. COURT FURTHER ORDERED, Pltf's Countermotion to Stay Litigation and for finding of vexatious litigant, DENIED WITHOUT PREJUDICE. ;*
- 07/31/2017  **Motion For Stay** (10:00 AM) (Judicial Officer: Sturman, Gloria)  
*Plaintiff's Motion for Stay of Litigation Pending Appeal Pursuant to NRAP 8(a)*  
Motion Granted;  
Journal Entry Details:  
*Mr. Jones advised he had not heard anything from opposing counsel and he didn't see any opposition. COURT ORDERED, Motion GRANTED; temporary 90-day stay in place; matter SET for status check. Mr. Jones to prepare the Order. 10/31/2017 - 9:00 AM - STATUS CHECK: STAY;*
- 10/31/2017  **Status Check** (9:00 AM) (Judicial Officer: Sturman, Gloria)  
**10/31/2017, 01/25/2018, 05/01/2018, 10/30/2018**  
*Status Check: Stay*  
Matter Continued;  
See 01/25/18 Advance Decision  
Matter Heard;  
Matter Continued;  
Matter Continued;  
Held on 1/8/19  
Journal Entry Details:  
*Mr. Jones stated the appeal was heard on July 9, 2018 and they were just waiting on the decision. COURT ORDERED, Status Check: Stay CONTINUED. CONTINUED TO: 01/29/18*

# CASE SUMMARY

CASE NO. A-15-723134-C

9:00 AM;  
Matter Continued;  
See 01/25/18 Advance Decision  
Matter Heard;  
Matter Continued;  
Matter Continued;  
Held on 1/8/19  
Journal Entry Details:  
*Upon Court's inquiry, counsel agreed to continue the matter six months. COURT ORDERED, matter CONTINUED. CONTINUED TO: 10/30/18 9:00 AM;*  
Matter Continued;  
See 01/25/18 Advance Decision  
Matter Heard;  
Matter Continued;  
Matter Continued;  
Held on 1/8/19  
Journal Entry Details:  
*COURT FINDS at the October 31, 2017 hearing counsel indicated their appeal was due November 2, 2017 and the Status Check was extended to January 30, 2018. COURT ORDERED, Counsel to forward to the Court a WRITTEN UPDATE of the appeal status and advise when the next status check is requested, otherwise the Status Check shall be continued to May 1, 2018; Status Check currently set for January 30, 2018 VACATED. CLERK'S NOTE: A copy of this minute order was faxed or placed in the attorney folder(s) of: Prescott Jones, Esq. (702-997-3800 Resnic & Lewis), Paul Larsen, Esq. (702-784-5252 Snell & Wilmer), and Brian Nettles, Esq. (702-434-1488 Nettles Law Firm)/ ls 1-25-18 ;*  
Matter Continued;  
See 01/25/18 Advance Decision  
Matter Heard;  
Matter Continued;  
Matter Continued;  
Held on 1/8/19  
Journal Entry Details:  
*Mr. Winder stated the appeal was due on November 2, 2017. Upon inquiry by the Court regarding whether the matter was fully briefed, Mr. Winder requested 90 days. COURT ORDERED, Status Check: Stay CONTINUED; Stay EXTENDED to 01/30/18. 01/30/18 9:00 AM STATUS CHECK: STAY;*

01/08/2019



**Status Check (9:00 AM)** (Judicial Officer: Sturman, Gloria)

Referred to Discovery Commissioner;

Journal Entry Details:

*Court noted the case had been stayed for a year and indicated the case would be coming up on the five-year rule. Ms. Morris stated the only thing they'd done during the stay was file an answer. Court inquired if the parties wished to proceed in the ordinary course. Mr. Jones stated the ADR Commissioner had requested information from the parties during the stay. COURT ORDERED, Stay LIFTED; Parties REFERRED to ADR; Parties REFERRED to Discovery Commissioner; Counsel to calculate how long the case was stayed and determine when the five year rule runs.;*

05/29/2019

**CANCELED Mandatory Rule 16 Conference (10:30 AM)** (Judicial Officer: Sturman, Gloria)  
*Vacated - per Letter*

06/18/2019



**Objection to the Arbitration Commissioner's Report (9:30 AM)** (Judicial Officer: Sturman, Gloria)

Denied;

Journal Entry Details:

*Ms. Morris argued their request for exemption was after the deadline and as such prejudicial, that their request for exemption stated lost revenue of \$50,000 with no evidence, that this was a sole practitioner's web site with no evidence of anyone looking at the post, and that they must show intent and evidence of damages. Ms. Morris argued Pltf.'s allege a loss of over \$1 million for a posting the Deft. never received any referrals from and that Pltf.'s argued this was public policy; however when Deft.'s argued public policy they argued it wasn't. Ms. Morris argued there was no evidence anyone read the post and that the prejudice to Deft. was great. Mr. Jones argued discovery hadn't even opened due to the appeal, there was no prejudice, that in*

# CASE SUMMARY

CASE NO. A-15-723134-C

this type of case it was difficult to quantify and even more difficult to prove. Mr. Jones further argued the case the Def't.'s cite was worth well over \$50,000 in current dollars and that his client was seeking to sell a portion of his practice and the first thing that comes up when you google search him is this post. Mr. Jones argued good cause existed, there were substantial damages claimed, and there was good cause to waive timelines due to the issues raised. Ms. Morris argued the Pltf. did not state any good cause, there was extreme delay, and the only way to proceed would be to keep the case in the arbitration program. **COURT STATED FINDINGS AND ORDERED, Objection DENIED; counsel to proceed with the litigation in a timely manner. ;**

08/20/2019



**Motion to Dismiss (9:30 AM)** (Judicial Officer: Sturman, Gloria)

Defendants' Motion to Dismiss Pursuant to NRCP 16.1(e)(1)

Denied;

Journal Entry Details:

Mr. Morris argued regarding the Moon case, that if the case was never accepted in the arbitration program then there was no tolling, that they were prevented from noticing, and that they had to ask for a continuance and show compelling or extra ordinary circumstances. Mr. Morris advised regarding how the case proceeded and further argued regarding the tolling time frames. Mr. Morris argued nothing prevented Def't.'s from noticing and scheduling the Early Case Conference (ECC). Mr. Jones argued there was a stay prior to the first answer by Def't.'s and his client couldn't have filed the ECC, that the Moon case was never raised in the initial motion, and if the Court was going to rely on it he would request an opportunity to brief it. Mr. Jones further argued the 180 days ran on July 7, that he attempted to contact Def't. on July 10 but was told he was unavailable, and that he hadn't heard from Def't. until he filed his motion on Monday. Mr. Jones argued he set the ECC and Def't. did not appear. Following further arguments regarding the time frame to file the ECC, **COURT ORDERED, Motion DENIED** as the Court does not think a party gets additional time; however there was the argument that they didn't have to schedule anything during the time period, that they were entitled to claim additional time which was good cause; Pltf. to prepare the order.;

09/06/2019



**Status Check (3:00 AM)** (Judicial Officer: Sturman, Gloria)

**09/06/2019, 09/20/2019**

Is JCCR Filed

Matter Continued;

Matter Continued;

JCCR Filed

Journal Entry Details:

**COURT FINDS** the Joint Case Conference Report to be filed and a meeting held on September 13, 2019. **COURT ORDERED, Status Check CONTINUED** 30 days to allow counsel the necessary time to file. **CONTINUED TO: 10/18/19 Chambers Calendar. CLERK'S NOTE: Minutes CORRECTED** to reflect the JCCR was to be filed. A copy of this minute order has been electronically served to all registered parties for Odyssey File & Serve./s 09-20-19;

Matter Continued;

Matter Continued;

JCCR Filed

Journal Entry Details:

**COURT FINDS** a Status Check on the Chambers Calendar Re: Joint Case Conference Report, with the order on August 20, 2019 hearing having been submitted, **COURT THEREFORE ORDERED, Status Check CONTINUED. CONTINUED TO: 09/20/19 Chambers Calendar CLERK'S NOTE: A copy of this minute order has been electronically served to all registered parties for Odyssey File & Serve./s 09-06-19;**

10/29/2019

**CANCELED Motion to Strike (9:00 AM)** (Judicial Officer: Sturman, Gloria)

Vacated - per Judge

Defendant Ingrid Patin's Objection and Motion to Strike Notice of Entry of Order Denying

Defendant's Motion to Dismiss

10/29/2019

**CANCELED Motion to Strike (9:30 AM)** (Judicial Officer: Sturman, Gloria)

Vacated - On in Error

Defendant Ingrid Patin's Objection and Motion to Strike Notice of Entry of Order Denying

Defendant's Motion to Dismiss

11/13/2019



# CASE SUMMARY

CASE NO. A-15-723134-C



## **Mandatory Rule 16 Conference (10:30 AM) (Judicial Officer: Sturman, Gloria)**

Trial Date Set;

Journal Entry Details:

*Following colloquy, COURT ORDERED, Trial Dates Set. 01/28/21 9:00 AM CALENDAR CALL 02/16/21 9:00 AM BENCH TRIAL Ms. Doyle stated the damages claim was for \$10 million and as of this date she had not received a computation of damages, that the case had been going on since 2015, and that as of this date she'd not received any information regarding losses. Mr. Jones stated disclosures were filed two months ago and that this was a discovery issue and better handled by the Discovery Commissioner. Mr. Jones stated a 2.67 hearing may be needed. Court stated the Deft.'s were entitled to know if this was personal or public and that they needed to know if they can stick to this timeline. Mr. Jones stated his client's damages were personal, that he was working to get the documents diligently, that this was defamation per se, and that it was regarding diminution of value of a business. Mr. Jones stated he planned to supplement discovery by December and that he thought discovery could be completed in nine months. Court stated that would be a six week delay and the documents would require a great deal of analysis and that the Deft.'s were entitled to discovery; however she thought discovery could be completed in nine months. COURT ORDERED, Case REFERRED to the Discovery Commissioner regarding a dispute resolution conference.;*

03/03/2020



## **Motion to Compel (10:00 AM) (Judicial Officer: Truman, Erin)**

*Defendant Ingrid Patin's Motion to Compel Plaintiff's Computation of Damages*

*Granted in Part; Defendant Ingrid Patin's Motion to Compel Plaintiff's Computation of Damages*

Journal Entry Details:

*Arguments by counsel. Mr. Jones addressed the potential business disparagement claim; the potential sale that did not go forward, but the sale was less than what it would have been due to the defamatory statement. COMMISSIONER RECOMMENDED, motion is GRANTED IN PART and DENIED IN PART; any calculation Plaintiff has at this point must be disclosed when it is available, or at expert disclosure; supplement the calculation of damages, and the amount will be supplemented; if Plaintiff is claiming a decline in business, any economic damages that can be identified must be supplemented; expert disclosures may change that amount; disclose information within 30 days from today. Ms. Morris to prepare the Report and Recommendations, and Mr. Jones to approve as to form and content. A proper report must be timely submitted within 14 days of the hearing. Otherwise, counsel will pay a contribution.;*

04/02/2020

## **CANCELED Status Check: Compliance (3:00 AM) (Judicial Officer: Truman, Erin)**

*Vacated*

*Status Check: Compliance / 3-3-2020 DCRR*

08/04/2020



## **Motion to Extend Discovery (9:00 AM) (Judicial Officer: Sturman, Gloria)**

*Plaintiff Motion to Extend Discovery Deadline -- First Request*

*Granted Without Prejudice;*

Journal Entry Details:

*Arguments by counsel regarding Plaintiff's Motion to Extend Discovery Deadline - First Request. COURT stated FINDINGS and ORDERED, motion GRANTED under 17 and 18 of the Administrative Order to allow additional time for discovery, additional time for expert and rebuttal disclosures. Further, however much time was necessary to depose the Plaintiff. COURT NOTED the motion was GRANTED WITHOUT PREJUDICE to the Defendant to move to exclude the information. As the information appeared to predate Co-Vid. Additionally, the Court was not prepared to exclude the expert at this point. Court expressed concern that the Plaintiff did not produce relevant information to the Defendant at an earlier point in time. Party allowed to produce the expert witness report, allowed an additional sixty days to file an opposition to the report, and allow deposition of the Plaintiff, not limited by any number of hours as necessary. COURT FURTHER NOTED all was without prejudice to the Defendant to raise issues with why this information was not disclosed sooner. Mr. Jones advised based on opposing parties request the expert's name was Christopher Money. Court noted the expert's name should be included in the Order. COURT DIRECTED Mr. Jones to prepare the Order and the expert should be disclosed / identified. ;*

08/25/2020



## **Minute Order (3:00 AM) (Judicial Officer: Sturman, Gloria)**

*Minute Order - No Hearing Held;*

Journal Entry Details:

EIGHTH JUDICIAL DISTRICT COURT

**CASE SUMMARY**

**CASE NO. A-15-723134-C**

*There being no response filed and the filing of a Notice of Withdraw of the Motion to Strike Defendant Ingrid Patin's Supplemental Opposition to Plaintiff's Motion to Extend Discovery Deadlines and Request for Sanctions, as well as request to vacate the hearing, COURT ORDERED, the September 8, 2020 Plaintiff Ton Vinh Lee's Motion to Strike Defendant Ingrid Patin's Supplemental Opposition to Plaintiff's Motion to Extend Discovery Deadlines and Request for Sanctions VACATED as MOOT. CLERK'S NOTE: This minute order was electronically served by Courtroom Clerk, Natalie Ortega, to all registered parties for Odyssey File & Serve and/or served via facsimile. ndo/08/25/20;*

09/08/2020	<b>CANCELED Motion to Strike</b> (9:00 AM) (Judicial Officer: Sturman, Gloria) <i>Vacated - per Attorney or Pro Per Plaintiff Ton Vinh Lee's Motion to Strike Defendant Ingrid Patin's Supplemental Opposition to Plaintiff's Motion to Extend Discovery Deadlines and Request for Sanctions</i>
09/15/2020	<b>Motion for Summary Judgment</b> (9:30 AM) (Judicial Officer: Sturman, Gloria) <i>Defendant Ingrid Patin's Motion for Judgment on the Pleadings, in the Alternative, Motion for Summary Judgment Granted;</i>
09/15/2020	<b>Joinder</b> (9:30 AM) (Judicial Officer: Sturman, Gloria) <i>Defendant Patin Law Group, PLLC's Joinder to Defendant Ingrid Patin's Motion for Judgment on the Pleadings, in the Alternative, Motion for Summary Judgment Granted;</i>
09/15/2020	<b>Joinder</b> (9:30 AM) (Judicial Officer: Sturman, Gloria) <i>Defendant Patin Law Group, PLLC's Joinder to Defendant Ingrid Patin's Motion for Judgment on the Pleadings, in the Alternative, Motion for Summary Judgment Granted;</i>
09/15/2020	 <b>All Pending Motions</b> (9:30 AM) (Judicial Officer: Sturman, Gloria) <i>Matter Heard; Journal Entry Details: DEFENDANT INGRID PATIN'S MOTION FOR JUDGMENT ON THE PLEADINGS, IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT . . . DEFENDANT PATIN LAW GROUP, PLLC'S JOINDER TO DEFENDANT INGRID PATIN'S MOTION FOR JUDGMENT ON THE PLEADINGS, IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT . . . DEFENDANT PATIN LAW GROUP, PLLC'S JOINDER TO DEFENDANT INGRID PATIN'S MOTION FOR JUDGMENT ON THE PLEADINGS, IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT. Arguments by counsel. Colloquy regarding discovery that has not been completed. Court inquired if there was any evidence to go on. Further arguments by counsel. COURT stated its FINDINGS and ORDERED Summary Judgment GRANTED as to Ms. Patin. Ms. Morris to prepare the order.;</i>
01/06/2021	<b>Motion</b> (9:30 AM) (Judicial Officer: Sturman, Gloria) <b>01/06/2021, 02/09/2021</b> <i>Plaintiff Ton Vinh Lee's Motion for Reconsideration of the Court's Order Granting Defendant Ingrid Patin's Motion for Summary Judgment Matter Continued; Motion Denied; Plaintiff Ton Vinh Lee's Motion for Reconsideration of the Court's Order Granting Defendant Ingrid Patin's Motion for Summary Judgment Matter Continued; Motion Denied; Plaintiff Ton Vinh Lee's Motion for Reconsideration of the Court's Order Granting Defendant Ingrid Patin's Motion for Summary Judgment</i>
01/06/2021	<b>Motion</b> (9:30 AM) (Judicial Officer: Sturman, Gloria) <b>01/06/2021, 02/09/2021, 03/26/2021</b> <i>Defendant Ingrid Patin's Motion for Attorneys' Fees, and Costs, and Interest Matter Continued; Matter Heard; Defendant Ingrid Patin's Motion for Attorneys' Fees, and Costs, and Interest Matter Continued; Matter Heard; Defendant Ingrid Patin's Motion for Attorneys' Fees, and Costs, and Interest</i>

# CASE SUMMARY

CASE NO. A-15-723134-C

01/06/2021	<p><b>Motion for Attorney Fees</b> (9:30 AM) (Judicial Officer: Sturman, Gloria)</p> <p><b>01/06/2021, 02/09/2021, 03/26/2021</b></p> <p><i>Defendant Patin Law Group, PLLC's Motion for Attorneys' Fees and Interest</i></p> <p>Matter Continued;</p> <p>Matter Heard; Defendant Patin Law Group, PLLC's Motion for Attorneys' Fees and Interest</p> <p>Matter Continued;</p> <p>Matter Heard; Defendant Patin Law Group, PLLC's Motion for Attorneys' Fees and Interest</p>
01/06/2021	<p><b>Motion to Amend Judgment</b> (9:30 AM) (Judicial Officer: Becker, Nancy)</p> <p><i>Plaintiff Ton Vinh Lee S Motion To Alter Or Amend Judgment Pursuant To NRCP 59(e)</i></p> <p>Denied;</p>
01/06/2021	<p><b>Joinder</b> (9:30 AM) (Judicial Officer: Sturman, Gloria)</p> <p><b>01/06/2021, 02/09/2021</b></p> <p><i>Defendant Patin Law Group, PLLC's Joinder to Defendant Ingrid Patin's Opposition to Plaintiff's Motion for Reconsideration of the Court's Order Granting Defendant's Motion for Summary Judgement</i></p> <p>Matter Continued;</p> <p>Motion Denied; Defendant Patin Law Group, PLLC's Joinder to Defendant Ingrid Patin's Opposition to Plaintiff's Motion for Reconsideration of the Court's Order Granting Defendant's Motion for Summary Judgement</p> <p>Matter Continued;</p> <p>Motion Denied; Defendant Patin Law Group, PLLC's Joinder to Defendant Ingrid Patin's Opposition to Plaintiff's Motion for Reconsideration of the Court's Order Granting Defendant's Motion for Summary Judgement</p>
01/06/2021	<p><b>Joinder</b> (9:30 AM) (Judicial Officer: Becker, Nancy)</p> <p><i>Defendant Patin Law Group, PLLC's Joinder to Defendant Ingrid Patin's Opposition to Plaintiff's Motion to Alter or Amend Judgement Pursuant to NRCP 59(e)</i></p> <p>Denied;</p>
01/06/2021	<p> <b>All Pending Motions</b> (9:30 AM) (Judicial Officer: Becker, Nancy)</p> <p>Matter Heard;</p> <p>Journal Entry Details:</p> <p><i>PLTF. TON VINH LEE S MOTION TO ALTER OR AMEND JUDGMENT PURSUANT TO NRCP 59(e)...DEFT. PATIN LAW GROUP, PLLC'S JOINDER TO DEFT. INGRID PATIN'S OPPOSITION TO PLTF'S MOTION TO ALTER OR AMEND JUDGMENT PURSUANT TO NRCP 59(e): Court stated there is no such thing as an alter or amend judgment in this context, therefore, ORDERED, Motion DENIED. PLTF. TON VINH LEE'S MOTION FOR RECONSIDERATION OF THE COURT'S ORDER GRANTING DEFT. INGRID PATIN'S MOTION FOR SUMMARY JUDGMENT...DEFT. PATIN LAW GROUP, PLLC'S JOINDER TO DEFT. INGRID PATIN'S OPPOSITION TO PLTF'S MOTION FOR RECONSIDERATION OF THE COURT'S ORDER GRANTING DEFT'S MOTION FOR SUMMARY JUDGMENT...DEFT. PATIN LAW GROUP, PLLC'S MOTION FOR ATTORNEYS' FEES AND INTEREST...DEFT. INGRID PATIN'S MOTION FOR ATTORNEYS' FEES, COSTS AND INTEREST: Court stated there has been a request from Ms. Morris to continue these matters as it was Judge Sterman who made the decisions and is most familiar with the case. Court stated it is prepared to rule on the motions, however, would like to hear from counsel regarding the request to continue. Counsel stated that based on the history Judge Sterman has with this case, request it be continued for Judge Sturman to hear these matters. COURT ORDERED, Motions CONTINUED. 2/09/21 9:30 AM PLTF. TON VINH LEE'S MOTION FOR RECONSIDERATION OF THE COURT'S ORDER GRANTING DEFT. INGRID PATIN'S MOTION FOR SUMMARY JUDGMENT...DEFT. PATIN LAW GROUP, PLLC'S JOINDER TO DEFT. INGRID PATIN'S OPPOSITION TO PLTF'S MOTION FOR RECONSIDERATION OF THE COURT'S ORDER GRANTING DEFT'S MOTION FOR SUMMARY JUDGMENT...DEFT. PATIN LAW GROUP, PLLC'S MOTION FOR ATTORNEYS' FEES AND INTEREST...DEFT. INGRID PATIN'S MOTION FOR ATTORNEYS' FEES, COSTS AND INTEREST;</i></p>
01/06/2021	<p><b>CANCELED All Pending Motions</b> (9:30 AM) (Judicial Officer: Becker, Nancy)</p> <p><i>Vacated - Duplicate Entry</i></p>
01/28/2021	<p><b>CANCELED Calendar Call</b> (9:00 AM) (Judicial Officer: Sturman, Gloria)</p>



EIGHTH JUDICIAL DISTRICT COURT

**CASE SUMMARY**

**CASE NO. A-15-723134-C**

*Vacated - per Judge*

02/09/2021



**All Pending Motions (9:30 AM)** (Judicial Officer: Sturman, Gloria)

Matter Heard;

Journal Entry Details:

*PLAINTIFF TON VINH LEE'S MOTION FOR RECONSIDERATION OF THE COURT'S ORDER GRANTING DEFENDANT INGRID PATIN'S MOTION FOR SUMMARY JUDGMENT ..DEFENDANT PATIN LAW GROUP, PLLC'S JOINDER TO DEFENDANT INGRID PATIN'S OPPOSITION TO PLAINTIFF'S MOTION FOR RECONSIDERATION OF THE COURT'S ORDER GRANTING DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT... DEFENDANT INGRID PATIN'S MOTION FOR ATTORNEYS' FEES, AND COSTS, AND INTEREST.... DEFENDANT PATIN LAW GROUP, PLLC's MOTION FOR ATTORNEYS' FEES AND INTEREST Mr. Jones argued in support of Motion for Reconsideration and stated the order for argument was already made and decided by the predecessor Court. Ms. Morris argued in opposition as there was no new information and Plaintiff has not met any of the prongs for reconsideration. Mr. Doyle had no additional issues to raise. Further argument. Court advised it seems like at this point where we have further discovery, it was a different time in the case and different information upon which to base the summary judgment and it was granted on that basis. Subsequently, the case evolved over this period of time. COURT ORDERED, Motion for Reconsideration DENIED. Arguments by counsel regarding Motions for Attorney's Fees. Mr. Kerry stated the arguments were the same; the only difference is the amount of fees and costs. Court believes there were valid offers of judgment; however, they has to do the Beattie analysis and it wants to look at the Rose Miller case and billing statements, noting the costs appeared to be reasonable. COURT ORDERED, Motions for Attorney's Fees CONTINUED to chambers for decision, noting it had a question whether there should be attorney's fees under those offers, and if it was reasonable and how much. Mr. Jones to prepare Order, approved as to form and content by opposing counsel. CONTINUED TO 3/26/21 (CHAMBERS) DEFENDANT INGRID PATIN'S MOTION FOR ATTORNEYS' FEES, AND COSTS, AND INTEREST....DEFENDANT PATIN LAW GROUP, PLLC's MOTION FOR ATTORNEYS' FEES AND INTEREST ;*

02/16/2021

**CANCELED Jury Trial (9:00 AM)** (Judicial Officer: Sturman, Gloria)

*Vacated - per Judge*

**DATE**

**FINANCIAL INFORMATION**

**Cross Defendant** Patin Law Group PLLC

Total Charges 430.00

Total Payments and Credits 430.00

**Balance Due as of 2/22/2021 0.00**

**Cross Claimant** Patin, Ingrid

Total Charges 847.00

Total Payments and Credits 847.00

**Balance Due as of 2/22/2021 0.00**

**Plaintiff** Lee, Ton Vinh

Total Charges 294.00

Total Payments and Credits 294.00

**Balance Due as of 2/22/2021 0.00**

**Cross Claimant** Patin, Ingrid

Appeal Bond Balance as of 2/22/2021 500.00

## DISTRICT COURT CIVIL COVER SHEET

A-15-723134-C

Clark County, Nevada

IX

Case No. \_\_\_\_\_  
(Assigned by Clerk's Office)**I. Party Information** (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone): Ton V. Lee, DDS 9525 W. Russell Rd. Las Vegas, NV 89148 (702) 579-7645	Defendant(s) (name/address/phone): Ingrid Patin, individual; Patin Law Group, PLLC 6671 S. Las Vegas, Blvd., Suite 210 Las Vegas, NV 89119 (702) 461-5241
Attorney (name/address/phone): Prescott T. Jones, Esq.--Bremer Whyte Brown & O'Meara, LLP 1160 North Town Center Dr., Suite 250 Las Vegas, NV 89144 (702) 258-6665	Attorney (name/address/phone): Patin Law Group, PLLC 6671 S. Las Vegas Blvd., Suite 210 Las Vegas, NV 89119 (702) 461-5241


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

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

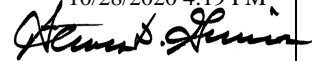
Business Court filings should be filed using the Business Court civil coversheet.

August 17, 2015

Date

  
 Signature of initiating party or representative

See other side for family-related case filings.



CLERK OF THE COURT

**ORDR**

BRIAN D. NETTLES, ESQ.

Nevada Bar No. 7462

CHRISTIAN M. MORRIS, ESQ.

Nevada Bar No. 11218

VICTORIA R. ALLEN, ESQ.

Nevada Bar No. 15005

NETTLES | MORRIS

1389 Galleria Drive, Suite 200

Henderson, Nevada 89014

Telephone: (702) 434-8282

Facsimile: (702) 434-1488

[brian@nettlesmorris.com](mailto:brian@nettlesmorris.com)[christian@nettlesmorris.com](mailto:christian@nettlesmorris.com)[victoria@nettlesmorris.com](mailto:victoria@nettlesmorris.com)*Attorneys for Plaintiff***DISTRICT COURT****CLARK COUNTY, NEVADA**

TON VINH LEE, an individual;

Plaintiff,

vs.

INGRID PATIN, an individual, and PATIN  
LAW GROUP, PLLC, a Nevada  
Professional LLC,

Defendants.

CASE NO.: A-15-723134-C

DEPT NO.: XXVI

**ORDER GRANTING DEFENDANT  
PATIN'S MOTION FOR SUMMARY  
JUDGMENT AND PATIN LAW  
GROUP'S JOINDER**

On September 15, 2020, at 9:30 a.m., the above-captioned case came before the Honorable Judge Gloria Sturman, regarding Defendant/Cross Claimant INGRID PATIN'S *Motion for Judgment on the Pleadings, in the Alternative, Motion for Summary Judgment* and Defendant/Cross Defendant PATIN LAW GROUP, PLLC'S *Joinder To Defendant Ingrid Patin's Motion For Judgment On The Pleadings, In The Alternative, Motion For Summary Judgment Defendant's Motion for Summary Judgment on the Pleadings*, with Christian M. Morris, Esq. of Nettles Morris appearing on behalf of INGRID PATIN, Kerry J. Doyle, Esq. of Doyle Law Group appearing on behalf of PATIN LAW GROUP, PLLC, and Prescott T. Jones of RESNICK & LOUIS, PC appearing on behalf of Plaintiff TON VINH LEE. The Court,

1 having reviewed this Motion, the papers and pleadings on file herein, and the arguments of  
2 counsel, finds and orders as follows:

3 **FINDINGS OF FACT**

- 4 1. The Court finds that this is an action for defamation per se regarding a statement on  
5 the patinlaw.com website about a wrongful death/dental malpractice lawsuit that  
6 arose from a wisdom tooth extraction.
- 7 2. The Court finds that, on February 7, 2012, a dental malpractice lawsuit was filed  
8 against the Plaintiff's dental practice, the Plaintiff as the owner, as well as two other  
9 dentists who assisted in the procedure.
- 10 3. The Court finds that, according to Court records, the lawsuit went to trial and  
11 Plaintiff Singletary received a jury award in its favor against Ton Vinh Lee's dental  
12 practice and the two other dentists who performed the procedure. Ton Vinh Lee  
13 received a verdict in favor and was awarded his costs from Plaintiff Singletary.
- 14 4. The Court finds that, according to Court records, after the verdict was entered, the  
15 district court granted a renewed motion for judgment as a matter of law, overturning  
16 the jury award. The jury award in favor of Ton Vinh Lee was not overturned.
- 17 5. The Court finds that, according to Court records, after the jury award in favor of  
18 Plaintiff Singletary was overturned, an appeal was filed and the verdict in favor of  
19 Plaintiff Singletary was reinstated.
- 20 6. The Court finds that the alleged defamatory statement was made on patinlaw.com  
21 regarding the verdict and who the parties to the lawsuit were.
- 22 7. The Court finds that the following statements testified to by Plaintiff during his  
23 sworn deposition on July 14, 2020 were true and accurate:
  - 24 a. The Court finds that Plaintiff admits the matter was a dental  
25 malpractice/wrongful death action.
  - 26 b. The Court finds that Plaintiff admits the trial jury resulted in a plaintiffs'  
27 verdict against his practice and two other dentists who performed the  
28 procedure, but also noted that a verdict was rendered in his favor as against

1 Plaintiff Singletary.

2 c. The Court finds that Plaintiff admits the description of the Complaint was  
3 *Singletary v. Ton Vinh Lee DDS, et al.*.

4 d. The Court finds that Plaintiff admits that *Singletary* was a dental malpractice-  
5 based wrongful death action that arose from the death of Reginald Singletary.

6 e. The Court finds that Plaintiff admits that Singletary had sued the dental  
7 office of Summerlin Smiles.

8 f. The Court finds that Plaintiff admits that Singletary had sued the treating  
9 dentists, Florida Traivai DMD and Jai Park DDS.

10 g. The Court finds that Plaintiff admits that Singletary had sued on behalf of the  
11 estate, herself, and minor son.

12 8. The Court reviewed the statement line by line and finds that there was a Plaintiffs'  
13 verdict for \$3.4 million on the medical malpractice trial.

#### 14 CONCLUSIONS OF LAW

15 **THE COURT CONCLUDES** that under *Sahara Gaming Corp. v. Culinary Workers*  
16 *Union Local 226*, 115 Nev. 212, 215 (1999) statements recounting judicial proceedings are  
17 protected against claims of defamation by the absolute "fair-reporting" privilege. Further, the  
18 privilege protects any person – whether a member of the media or the public – provided the  
19 statements are a fair and impartial reporting of the facts.

20 **THE COURT FURTHER CONCLUDES** that Defendants' statement was a fair and  
21 impartial reporting of the facts of the *Singletary* case, per *Sahara Gaming Corp.*

22 **THE COURT FURTHER CONCLUDES** that under *Adelson v. Harris*, 402 P.3d 665  
23 (Nev. 2017), the State adopted the test established in *Dameron v. Wash Magazine, Inc.*,  
24 whereby a summary of an official document or proceeding must be apparent either from  
25 specific attribution to the official document or from the overall context of the official document  
26 that the summary is quoting, paraphrasing, or otherwise drawing.

27 **THE COURT FURTHER CONCLUDES** that Defendants' statement is a fair and  
28 impartial summary of the facts attributed to official documents or proceedings from the

1 *Singletary* case, as the statement references the case name, per *Adelson*.

2 **THE COURT FURTHER CONCLUDES** that the content of the alleged defamatory  
3 statement represents fair and impartial reporting of official proceedings and thus falls under the  
4 “fair reporting” privilege.

5 **THE COURT FURTHER CONCLUDES** that there is no distinction made under the  
6 “fair reporting” privilege between an individual and a corporation, and no such argument was  
7 made by Plaintiff. Therefore, the privilege would apply to both Defendant Ingrid Patin,  
8 individually, and Defendant Patin Law Group, PLLC.

9 **THE COURT FURTHER CONCLUDES** that, under *Chowdhry v. NLVH, Inc.*, 109  
10 Nev. 478, 483, 851 P.2d 459 (1993), in order to establish a *prima facie* case of defamation, a  
11 plaintiff must prove the alleged defamatory statement is false and defamatory. If the defamation  
12 tends to injure the plaintiff in his or her business profession, it is deemed defamation *per se*, and  
13 damages will be presumed but Plaintiff must still prove the falsity of the statement.

14 **THE COURT FURTHER CONCLUDES** that, during Plaintiff’s sworn deposition  
15 testimony, Plaintiff admitted every sentence of the statement was true, but did not admit it was  
16 true in its entirety.

17 **THE COURT FURTHER CONCLUDES** that Plaintiff has no evidence the statement  
18 is false, per *Chowdry*.

19 **THE COURT FURTHER CONCLUDES** that, while Defendants did not authenticate  
20 the deposition transcript from the deposition of Plaintiff, the Court accepts the transcript as the  
21 sworn testimony of the Plaintiff as Plaintiff did not dispute this was his sworn testimony under  
22 oath or object to the testimony in any pleadings.

23 **THE COURT FURTHER CONCLUDES** that based upon the fact there is no genuine  
24 material issue as to the falsity of the statement, as Plaintiff admitted it was true; therefore  
25 Defendants’ statement on the website does not satisfy the elements of false and defamatory for a  
26 *prima facie* case of defamation *per se*.

27 **THE COURT FURTHER CONCLUDES** that there are no genuine issues of material  
28 fact as to the truth of the alleged defamatory statement.

*Case Name: Ton Vinh Lee v. Ingrid Patin*

*Case Number: A-15-723134-C*

**THE COURT FURTHER CONCLUDES** that Defendant Patin Law Group properly filed a joinder to the Motion and is entitled to the same ruling as Defendant Ingrid Patin.

**ORDER**

**IT IS ORDERED THAT**, based on the findings above and the facts provided in Plaintiff's deposition Defendants' *Motion for Summary Judgment and Joinder* as to the facts of the case and under the Fair Reporting Privilege is GRANTED.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2020, ~~Dated this 28th day of October, 2020~~



DISTRICT COURT JUDGE  
B09 1D5 EDF7 9C07  
Gloria Sturman  
District Court Judge

DATED this 16<sup>th</sup> day of October, 2020.

DATED this 16<sup>th</sup> day of October, 2020.

NETTLES | MORRIS

RESNICK & LOUIS, P.C.

/s/ Christian M. Morris

/s/ Prescott Jones

BRIAN D. NETTLES, ESQ.

PRESCOTT JONES, ESQ.

Nevada Bar No. 7462

Nevada Bar No. 11617

CHRISTIAN M. MORRIS, ESQ.

MYRAELIGH A. ALBERTO, ESQ.

Nevada Bar No. 11218

Nevada Bar No. 14340

VICTORIA R. ALLEN, ESQ.

8925 W. Russell road, Suite 220

Nevada Bar No. 15005

Las Vegas, Nevada 89148

1389 Galleria Drive, Suite 200

*Attorneys for Plaintiff,*

Henderson, Nevada 89014

*Ton Vinh Lee*

*Attorneys for Defendant, Ingrid Patin*

DATED this 16<sup>th</sup> day of October, 2020.

DOYLE LAW GROUP

/s/ Kerry J. Doyle

KERRY J. DOYLE, ESQ.

Nevada Bar No. 10571

7375 S. Pecos Rd., #101

Las Vegas, Nevada 89120

*Attorneys for Defendant, Patin Law Group,*

*PLLC*

## Jenn Alexy

---

**From:** Kerry Doyle <kdoyle@doylelawgroupplv.com>  
**Sent:** Friday, October 16, 2020 2:37 PM  
**To:** Prescott Jones  
**Cc:** Christian Morris; Jenn Alexy; Myraleigh Alberto; Susan Carbone  
**Subject:** Re: Lee vs. Patin: Order from 9/15 hearing

You can attach mine as well.

Sent from my iPhone

On Oct 16, 2020, at 2:29 PM, Prescott Jones <pjones@rlattorneys.com> wrote:

Thanks Christian. You can include my electronic signature.

Prescott T. Jones, Esq.  
Resnick & Louis, P.C.  
8925 West Russell Road, Suite 220  
Las Vegas, NV 89148  
Direct Phone: 702-997-1029  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
<http://www.rlattorneys.com>

<image001.png>

ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI |  
ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA |  
LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Christian Morris <Christian@nettlesmorris.com>  
Sent: Friday, October 16, 2020 2:22 PM  
To: Prescott Jones <pjones@rlattorneys.com>; Jenn Alexy <Jenn@nettlesmorris.com>; Kerry Doyle <kdoyle@doylelawgroupplv.com>  
Cc: Myraleigh Alberto <malberto@rlattorneys.com>; Susan Carbone <scarbone@rlattorneys.com>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Prescott,  
Changes made and attached in tracked form.  
Thanks,  
**Ms. Christian M. Morris, Esq.**  
**Managing Partner**



2019 Nevada Trial Lawyer of the Year

California Bar # 277641

New Jersey Bar # 006362012

Nevada Bar # 11218

**NETTLES | MORRIS**

[www.nettlesmorris.com](http://www.nettlesmorris.com)

1389 Galleria Drive. Ste 200

Henderson, NV 89014

**Phone (702) 434-8282**

Fax (702) 434-1488

[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)

*Governor, American Association of Justice (AAJ)*

*Governor, Nevada Justice Association (NJA)*

<image002.png>

---

From: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>

Sent: Friday, October 16, 2020 2:05 PM

To: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgroupnv.com](mailto:kdoyle@doylelawgroupnv.com)>

Cc: Myrleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>; Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>

Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Christian –

Transcript is attached. Thanks.

Prescott T. Jones, Esq.

Resnick & Louis, P.C.

8925 West Russell Road, Suite 220

Las Vegas, NV 89148

Direct Phone: 702-997-1029

[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)

<http://www.rlattorneys.com>

<image001.png>

ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI |  
ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA |  
LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>

Sent: Friday, October 16, 2020 2:03 PM

To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgroupnv.com](mailto:kdoyle@doylelawgroupnv.com)>

Cc: Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>; Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Prescott,  
Can you please send the transcript?  
Thanks,

**Ms. Christian M. Morris, Esq.**  
**Managing Partner**  
2019 Nevada Trial Lawyer of the Year  
California Bar # 277641  
New Jersey Bar # 006362012  
Nevada Bar # 11218  
**NETTLES | MORRIS**  
[www.nettlesmorris.com](http://www.nettlesmorris.com)  
1389 Galleria Drive. Ste 200  
Henderson, NV 89014  
**Phone (702) 434-8282**  
Fax (702) 434-1488  
[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)  
*Governor, American Association of Justice (AAJ)*  
*Governor, Nevada Justice Association (NJA)*

<image002.png>

---

From: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>  
Sent: Friday, October 16, 2020 1:51 PM  
To: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgroupplv.com](mailto:kdoyle@doylelawgroupplv.com)>  
Cc: Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>; Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Christian,

Regarding Finding of Fact 4, the jury award was not overturned in favor of Dr. Lee as a result of the Judgment as a Matter of Law. Is there any reason by "The jury award in favor of Ton Vinh Less was not overturned" was not included in your proposed order?

I also note that you did not include my proposed Finding of Fact 7h - "The Court finds that Plaintiff, while admitting that each part of the statement was true, disputed that the statement when read as a whole was true." Please note the following from the transcript of the hearing:

THE COURT: 57 of the transcript.

MR. JONES: Yeah, I'm looking at page 39 of my PDF here, lines 19 to 21. The question was asked by Ms. Morris to my client.

"Q So what part of the statement is untrue?"

The answer by my client,

"A It's the whole or some and not just the parts."

I just want to make it clear that my client certainly --

THE COURT: Okay.

MR. JONES: -- didn't admit that the statement was true in its entirety, just simply the individual parts.

THE COURT: Okay. I appreciate that. And, certainly, if you want to make sure that that's in the findings of fact and conclusions of law, I understand. And Ms. Morris will prepare those, and she'll show them to you before we submit them to the Court.  
So I appreciate you've made that clear for the record, and we'll include that in the findings, okay.

Please let me know your thoughts on the above – thanks.

Prescott T. Jones, Esq.  
Resnick & Louis, P.C.  
8925 West Russell Road, Suite 220  
Las Vegas, NV 89148  
Direct Phone: 702-997-1029  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
<http://www.rlattorneys.com>

<image001.png>

ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI |  
ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA |  
LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>  
Sent: Tuesday, October 13, 2020 8:31 PM  
To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgroupplv.com](mailto:kdoyle@doylelawgroupplv.com)>  
Cc: Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>; Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Prescott,  
I received your e-mail and reviewed your proposed changes. I have incorporated a majority of them. A few I cannot, as they are not supported by the record. Please let me know if you agree to the new proposed Order so we can submit to Chambers.  
Thank you,

**Ms. Christian M. Morris, Esq.**  
**Managing Partner**  
2019 Nevada Trial Lawyer of the Year  
California Bar # 277641  
New Jersey Bar # 006362012  
Nevada Bar # 11218  
**NETTLES | MORRIS**  
[www.nettlesmorris.com](http://www.nettlesmorris.com)  
1389 Galleria Drive. Ste 200  
Henderson, NV 89014  
**Phone (702) 434-8282**  
Fax (702) 434-1488

[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)

*Governor, American Association of Justice (AAJ)*

*Governor, Nevada Justice Association (NJA)*

<image002.png>

---

From: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>

Sent: Tuesday, October 6, 2020 4:27 PM

To: Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgrouplv.com](mailto:kdoyle@doylelawgrouplv.com)>

Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>;

Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>

Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Christian,

I've reviewed your proposed order, the briefs filed by the parties, and the transcript of the hearing, and request the below revisions. If you disagree with any of the below, please let me know what portion of the transcript and/or briefing supports your proposed language. Thanks.

Findings of Fact No. 3 – should be changed to “The Court finds that, according to Court records, the lawsuit went to trial and Plaintiff Singletary received a jury award in its favor as against Ton Vinh Lee’s dental practice and the two other dentists who performed the procedure. Ton Vinh Lee received a verdict in favor and was awarded his costs from Plaintiff Singletary.”

Findings of Fact No. 4 – should be changed to “. . . overturning the jury award in favor of Plaintiff Singletary. The jury award in favor of Ton Vinh Lee was not overturned.”

Findings of Fact No. 5 – should be changed to “. . . after the jury award in favor of Plaintiff Singletary was overturned, an appeal was filed and the verdict in favor of Plaintiff Singletary was reinstated.”

Findings of Fact No. 7b – should be changed to “The Court finds that Plaintiff admits the jury trial resulted in a plaintiffs’ verdict against his practice and two other dentists who performed the procedure, but also noted that a verdict was rendered in his favor as against plaintiff Singletary.”

Findings of Fact No. 7d – “Reginald” is misspelled.

Findings of Fact No. 7e – “Summerlin Smiles” is misspelled.

Findings of Fact No. 7h needs to be added and read “The Court finds that Plaintiff, while admitting that each part of the statement was true, disputed that the statement when read as a whole was true.”

Conclusions of Law on page 3, lines 22-24 – the portion of the paragraph reading “attributed to official documetns or proceedings from the Singletary case, as the statement references the case name, per Adelson” should be removed, as the Court did not make this ruling. If you can point to something in the transcript where the Court made this ruling, please let me know.

Conclusions of Law on page 4, lines 9-11 needs to have “but did not like the way it read as a whole” needs to be removed and replaced with “but also disputed that the statement when read as a whole was true.” This is consistent with the deposition testimony provided by your client in her Motion and Reply.

Conclusions of Law on page 4, lines 14-15 need to be removed and replaced with "THE COURT FURTHER CONCLUDES that, while Defendants did not authenticate the deposition transcript from the deposition of Plaintiff, the Court accepts the transcript as the sworn testimony of the Plaintiff."

Conclusions of Law on page 4, line 17 – the portion reading "as Plaintiff admitted it was true" needs to be replaced with "as Plaintiff admitted each portion of the statement was true, while disagreeing with the truth of the statement as a whole." Alternatively, I would accept removal of the quoted portion without replacement.

Regards,

Prescott T. Jones, Esq.  
Resnick & Louis, P.C.  
8925 West Russell Road, Suite 220  
Las Vegas, NV 89148  
Direct Phone: 702-997-1029  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
<http://www.rlattorneys.com>

<image001.png>

ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI |  
ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA |  
LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>  
Sent: Tuesday, October 6, 2020 8:59 AM  
To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Kerry Doyle <[kdoyle@doylelawgroupplv.com](mailto:kdoyle@doylelawgroupplv.com)>  
Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>;  
Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hello Prescott and Kerry,

Just following up on the email below and the proposed Order. Please let us know as soon as you are able. Thank you.

## **Jenn Alexy**

Paralegal to Christian M. Morris, Esq.,  
Edward J. Wynder, Esq., and Tori R. Allen, Esq.  
**NETTLES | MORRIS**  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Direct Tel: (702) 763-6918  
Tel: (702) 434-8282 ext. 238  
Fax: (702) 786-0402

---

From: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>  
Sent: Thursday, October 1, 2020 3:39 PM  
To: Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgrouplv.com](mailto:kdoyle@doylelawgrouplv.com)>  
Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>;  
Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Jenn,

I am in deposition today but should be able to review and respond back by tomorrow. Thanks.

Prescott T. Jones, Esq.  
Resnick & Louis, P.C.  
8925 West Russell Road, Suite 220  
Las Vegas, NV 89148  
Direct Phone: 702-997-1029  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
<http://www.rlattorneys.com>

<image001.png>

ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI |  
ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA |  
LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>  
Sent: Thursday, October 1, 2020 3:30 PM  
To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Kerry Doyle <[kdoyle@doylelawgrouplv.com](mailto:kdoyle@doylelawgrouplv.com)>  
Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>;  
Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: Lee vs. Patin: Order from 9/15 hearing

Hello,

Please see attached the draft Order granting Defendant Ingrid Patin's Motion for Summary Judgment and Patin Law Group's Joinder.

Please review and advise if any changes need to be made. If no changes are needed, please confirm your e-signature can be inserted for submission to the Court.

Thank you.

**Jenn Alexy**

Paralegal to Christian M. Morris, Esq.,  
Edward J. Wynder, Esq., and Tori R. Allen, Esq.  
**NETTLES | MORRIS**

1 **CSERV**

2  
3 **DISTRICT COURT**  
4 **CLARK COUNTY, NEVADA**

5  
6 Ton Lee, Plaintiff(s)

CASE NO: A-15-723134-C

7 vs.

DEPT. NO. Department 26

8 Ingrid Patin, Defendant(s)

9  
10 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 10/28/2020

15 "Christian M. Morris, Esq." . christianmorris@nettleslawfirm.com

16 "Jeremy J. Thompson, Esq." . jthompson@mpplaw.com

17 "Paul E Larsen, Esq." . plarsen@mpplaw.com

18 Coreene Drose . cdrose@rlattorneys.com

19 Cristina Robertson . crobertson@mpplaw.com

20 Debbie Surowiec . dsurowiec@mpplaw.com

21 Ingrid Patin . ingrid@patinlaw.com

22 Jenn Alexy . jenn@nettleslawfirm.com

23 Joyce Ulmer . julmer@mpplaw.com

24 Lisa Bell . lbell@rlattorneys.com

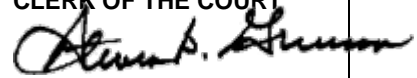
25 Nancy C. Rodriguez . nrodriguez@mpplaw.com

26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Prescott Jones .	pjones@rlattorneys.com
Christian Morris	christian@nettlesmorris.com
Susan Carbone	scarbone@rlattorneys.com
Jessica Humphrey	jhumphrey@rlattorneys.com
Tori Allen	victoria@nettlesmorris.com
Kerry Doyle	kdoyle@doylelawgroup.lv.com
Mikayla Hurtt	admin@doylelawgroup.lv.com
Emily Arriviello	emily@nettlesmorris.com
Myrleigh Alberto	malberto@rlattorneys.com





NEOJ  
CHRISTIAN M. MORRIS, ESQ.  
Nevada Bar No. 11218  
NETTLES | MORRIS  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Telephone: (702) 434-8282  
Facsimile: (702) 434-1488  
[christian@nettlesmorriss.com](mailto:christian@nettlesmorriss.com)  
*Attorney for Defendant, Ingrid Patin*

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

TON VINH LEE, an individual,  
  
Plaintiff,

v.

INGRID PATIN, an individual, and PATIN  
LAW GROUP, PLLC, a Nevada  
Professional LLC,  
  
Defendants.

CASE NO.: A-15-723134-C  
DEPT NO.: 26

**NOTICE OF ENTRY OF ORDER  
GRANTING DEFENDANT PATIN'S  
MOTION FOR SUMMARY  
JUDGMENT AND PATIN LAW  
GROUP'S JOINDER**

TO: ALL PARTIES; and  
TO: THEIR RESPECTIVE ATTORNEYS:

**PLEASE TAKE NOTICE** that an Order granting Defendant Patin's Motion for Summary Judgment and Patin Law Group's Joinder was duly entered in the above-entitled matter on the 28<sup>th</sup> day of October, 2020, a true and correct copy of said Order is attached hereto.

DATED this 30<sup>th</sup> day of October, 2020.

NETTLES | MORRIS



CHRISTIAN M. MORRIS, ESQ.  
Nevada Bar No. 011218  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
*Attorney for Defendant, Ingrid Patin*

700 121 8080 / 700 121 1488 (fax)

**CERTIFICATE OF SERVICE**

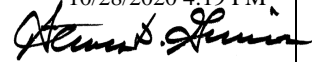
Pursuant to NEFCR 9, NRCP 5(b) and EDCR 7.26, I hereby certify that on this 30th day of October, 2020, a true and correct copy of the foregoing **NOTICE OF ENTRY OF ORDER GRANTING DEFENDANT PATIN'S MOTION FOR SUMMARY JUDGMENT AND PATIN LAW GROUP'S JOINDER** was served to the following parties by electronic transmission through the Odyssey eFileNV system and/or by depositing in the US Mail, postage prepaid, addressed as follows:

Kerry Doyle	kdoyle@doylelawgroupnv.com
Mikayla Hurtt	admin@doylelawgroupnv.com
Coreene Drose	cdrose@rlattorneys.com
Ingrid Patin	ingrid@patinlaw.com
Lisa Bell	lbell@rlattorneys.com
Prescott Jones	pjones@rlattorneys.com
Susan Carbone	scarbone@rlattorneys.com
Jessica Humphrey	jhumphrey@rlattorneys.com



---

An Employee of NETTLES | MORRIS

  
CLERK OF THE COURT

**NETTLES | MORRIS**  
1389 Galleria Drive Suite 200  
Henderson, NV 89014  
(702) 434-8282 / (702) 434-1488 (fax)

**ORDR**

BRIAN D. NETTLES, ESQ.  
Nevada Bar No. 7462  
CHRISTIAN M. MORRIS, ESQ.  
Nevada Bar No. 11218  
VICTORIA R. ALLEN, ESQ.  
Nevada Bar No. 15005  
NETTLES | MORRIS  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Telephone: (702) 434-8282  
Facsimile: (702) 434-1488  
[brian@nettlesmorris.com](mailto:brian@nettlesmorris.com)  
[christian@nettlesmorris.com](mailto:christian@nettlesmorris.com)  
[victoria@nettlesmorris.com](mailto:victoria@nettlesmorris.com)  
*Attorneys for Plaintiff*

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

TON VINH LEE, an individual;  
  
Plaintiff,  
  
vs.

CASE NO.: A-15-723134-C  
DEPT NO.: XXVI

INGRID PATIN, an individual, and PATIN  
LAW GROUP, PLLC, a Nevada  
Professional LLC,  
  
Defendants.

**ORDER GRANTING DEFENDANT  
PATIN'S MOTION FOR SUMMARY  
JUDGMENT AND PATIN LAW  
GROUP'S JOINDER**

On September 15, 2020, at 9:30 a.m., the above-captioned case came before the Honorable Judge Gloria Sturman, regarding Defendant/Cross Claimant INGRID PATIN'S *Motion for Judgment on the Pleadings, in the Alternative, Motion for Summary Judgment* and Defendant/Cross Defendant PATIN LAW GROUP, PLLC'S *Joinder To Defendant Ingrid Patin's Motion For Judgment On The Pleadings, In The Alternative, Motion For Summary Judgment Defendant's Motion for Summary Judgment on the Pleadings*, with Christian M. Morris, Esq. of Nettles Morris appearing on behalf of INGRID PATIN, Kerry J. Doyle, Esq. of Doyle Law Group appearing on behalf of PATIN LAW GROUP, PLLC, and Prescott T. Jones of RESNICK & LOUIS, PC appearing on behalf of Plaintiff TON VINH LEE. The Court,

1 having reviewed this Motion, the papers and pleadings on file herein, and the arguments of  
2 counsel, finds and orders as follows:

3 **FINDINGS OF FACT**

- 4 1. The Court finds that this is an action for defamation per se regarding a statement on  
5 the patinlaw.com website about a wrongful death/dental malpractice lawsuit that  
6 arose from a wisdom tooth extraction.
- 7 2. The Court finds that, on February 7, 2012, a dental malpractice lawsuit was filed  
8 against the Plaintiff's dental practice, the Plaintiff as the owner, as well as two other  
9 dentists who assisted in the procedure.
- 10 3. The Court finds that, according to Court records, the lawsuit went to trial and  
11 Plaintiff Singletary received a jury award in its favor against Ton Vinh Lee's dental  
12 practice and the two other dentists who performed the procedure. Ton Vinh Lee  
13 received a verdict in favor and was awarded his costs from Plaintiff Singletary.
- 14 4. The Court finds that, according to Court records, after the verdict was entered, the  
15 district court granted a renewed motion for judgment as a matter of law, overturning  
16 the jury award. The jury award in favor of Ton Vinh Lee was not overturned.
- 17 5. The Court finds that, according to Court records, after the jury award in favor of  
18 Plaintiff Singletary was overturned, an appeal was filed and the verdict in favor of  
19 Plaintiff Singletary was reinstated.
- 20 6. The Court finds that the alleged defamatory statement was made on patinlaw.com  
21 regarding the verdict and who the parties to the lawsuit were.
- 22 7. The Court finds that the following statements testified to by Plaintiff during his  
23 sworn deposition on July 14, 2020 were true and accurate:
- 24 a. The Court finds that Plaintiff admits the matter was a dental  
25 malpractice/wrongful death action.
- 26 b. The Court finds that Plaintiff admits the trial jury resulted in a plaintiffs'  
27 verdict against his practice and two other dentists who performed the  
28 procedure, but also noted that a verdict was rendered in his favor as against

1 Plaintiff Singletary.

2 c. The Court finds that Plaintiff admits the description of the Complaint was  
3 *Singletary v. Ton Vinh Lee DDS, et al.*.

4 d. The Court finds that Plaintiff admits that *Singletary* was a dental malpractice-  
5 based wrongful death action that arose from the death of Reginald Singletary.

6 e. The Court finds that Plaintiff admits that Singletary had sued the dental  
7 office of Summerlin Smiles.

8 f. The Court finds that Plaintiff admits that Singletary had sued the treating  
9 dentists, Florida Traivai DMD and Jai Park DDS.

10 g. The Court finds that Plaintiff admits that Singletary had sued on behalf of the  
11 estate, herself, and minor son.

12 8. The Court reviewed the statement line by line and finds that there was a Plaintiffs'  
13 verdict for \$3.4 million on the medical malpractice trial.

#### 14 CONCLUSIONS OF LAW

15 **THE COURT CONCLUDES** that under *Sahara Gaming Corp. v. Culinary Workers*  
16 *Union Local 226*, 115 Nev. 212, 215 (1999) statements recounting judicial proceedings are  
17 protected against claims of defamation by the absolute "fair-reporting" privilege. Further, the  
18 privilege protects any person – whether a member of the media or the public – provided the  
19 statements are a fair and impartial reporting of the facts.

20 **THE COURT FURTHER CONCLUDES** that Defendants' statement was a fair and  
21 impartial reporting of the facts of the *Singletary* case, per *Sahara Gaming Corp.*

22 **THE COURT FURTHER CONCLUDES** that under *Adelson v. Harris*, 402 P.3d 665  
23 (Nev. 2017), the State adopted the test established in *Dameron v. Wash Magazine, Inc.*,  
24 whereby a summary of an official document or proceeding must be apparent either from  
25 specific attribution to the official document or from the overall context of the official document  
26 that the summary is quoting, paraphrasing, or otherwise drawing.

27 **THE COURT FURTHER CONCLUDES** that Defendants' statement is a fair and  
28 impartial summary of the facts attributed to official documents or proceedings from the

1 *Singletary* case, as the statement references the case name, per *Adelson*.

2 **THE COURT FURTHER CONCLUDES** that the content of the alleged defamatory  
3 statement represents fair and impartial reporting of official proceedings and thus falls under the  
4 “fair reporting” privilege.

5 **THE COURT FURTHER CONCLUDES** that there is no distinction made under the  
6 “fair reporting” privilege between an individual and a corporation, and no such argument was  
7 made by Plaintiff. Therefore, the privilege would apply to both Defendant Ingrid Patin,  
8 individually, and Defendant Patin Law Group, PLLC.

9 **THE COURT FURTHER CONCLUDES** that, under *Chowdhry v. NLVH, Inc.*, 109  
10 Nev. 478, 483, 851 P.2d 459 (1993), in order to establish a *prima facie* case of defamation, a  
11 plaintiff must prove the alleged defamatory statement is false and defamatory. If the defamation  
12 tends to injure the plaintiff in his or her business profession, it is deemed defamation *per se*, and  
13 damages will be presumed but Plaintiff must still prove the falsity of the statement.

14 **THE COURT FURTHER CONCLUDES** that, during Plaintiff’s sworn deposition  
15 testimony, Plaintiff admitted every sentence of the statement was true, but did not admit it was  
16 true in its entirety.

17 **THE COURT FURTHER CONCLUDES** that Plaintiff has no evidence the statement  
18 is false, per *Chowdry*.

19 **THE COURT FURTHER CONCLUDES** that, while Defendants did not authenticate  
20 the deposition transcript from the deposition of Plaintiff, the Court accepts the transcript as the  
21 sworn testimony of the Plaintiff as Plaintiff did not dispute this was his sworn testimony under  
22 oath or object to the testimony in any pleadings.

23 **THE COURT FURTHER CONCLUDES** that based upon the fact there is no genuine  
24 material issue as to the falsity of the statement, as Plaintiff admitted it was true; therefore  
25 Defendants’ statement on the website does not satisfy the elements of false and defamatory for a  
26 *prima facie* case of defamation *per se*.

27 **THE COURT FURTHER CONCLUDES** that there are no genuine issues of material  
28 fact as to the truth of the alleged defamatory statement.

*Case Name: Ton Vinh Lee v. Ingrid Patin*

*Case Number: A-15-723134-C*

**THE COURT FURTHER CONCLUDES** that Defendant Patin Law Group properly filed a joinder to the Motion and is entitled to the same ruling as Defendant Ingrid Patin.

**ORDER**

**IT IS ORDERED THAT**, based on the findings above and the facts provided in Plaintiff's deposition Defendants' *Motion for Summary Judgment and Joinder* as to the facts of the case and under the Fair Reporting Privilege is GRANTED.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2020, ~~Dated this 28th day of October, 2020~~



DISTRICT COURT JUDGE  
B09 1D5 EDF7 9C07  
Gloria Sturman  
District Court Judge

DATED this 16<sup>th</sup> day of October, 2020.

DATED this 16<sup>th</sup> day of October, 2020.

NETTLES | MORRIS

RESNICK & LOUIS, P.C.

/s/ Christian M. Morris  
BRIAN D. NETTLES, ESQ.  
Nevada Bar No. 7462  
CHRISTIAN M. MORRIS, ESQ.  
Nevada Bar No. 11218  
VICTORIA R. ALLEN, ESQ.  
Nevada Bar No. 15005  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
*Attorneys for Defendant, Ingrid Patin*  
DATED this 16<sup>th</sup> day of October, 2020.

/s/ Prescott Jones  
PRESCOTT JONES, ESQ.  
Nevada Bar No. 11617  
MYRAELIGH A. ALBERTO, ESQ.  
Nevada Bar No. 14340  
8925 W. Russell road, Suite 220  
Las Vegas, Nevada 89148  
*Attorneys for Plaintiff,*  
*Ton Vinh Lee*

DOYLE LAW GROUP

/s/ Kerry J. Doyle  
KERRY J. DOYLE, ESQ.  
Nevada Bar No. 10571  
7375 S. Pecos Rd., #101  
Las Vegas, Nevada 89120  
*Attorneys for Defendant, Patin Law Group,*  
*PLLC*

## Jenn Alexy

---

**From:** Kerry Doyle <kdoyle@doylelawgroupplv.com>  
**Sent:** Friday, October 16, 2020 2:37 PM  
**To:** Prescott Jones  
**Cc:** Christian Morris; Jenn Alexy; Myraleigh Alberto; Susan Carbone  
**Subject:** Re: Lee vs. Patin: Order from 9/15 hearing

You can attach mine as well.

Sent from my iPhone

On Oct 16, 2020, at 2:29 PM, Prescott Jones <pjones@rlattorneys.com> wrote:

Thanks Christian. You can include my electronic signature.

Prescott T. Jones, Esq.  
Resnick & Louis, P.C.  
8925 West Russell Road, Suite 220  
Las Vegas, NV 89148  
Direct Phone: 702-997-1029  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
<http://www.rlattorneys.com>

<image001.png>

ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI |  
ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA |  
LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Christian Morris <Christian@nettlesmorris.com>  
Sent: Friday, October 16, 2020 2:22 PM  
To: Prescott Jones <pjones@rlattorneys.com>; Jenn Alexy <Jenn@nettlesmorris.com>; Kerry Doyle <kdoyle@doylelawgroupplv.com>  
Cc: Myraleigh Alberto <malberto@rlattorneys.com>; Susan Carbone <scarbone@rlattorneys.com>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Prescott,  
Changes made and attached in tracked form.  
Thanks,  
**Ms. Christian M. Morris, Esq.**  
**Managing Partner**



2019 Nevada Trial Lawyer of the Year

California Bar # 277641

New Jersey Bar # 006362012

Nevada Bar # 11218

**NETTLES | MORRIS**

[www.nettlesmorris.com](http://www.nettlesmorris.com)

1389 Galleria Drive. Ste 200

Henderson, NV 89014

**Phone (702) 434-8282**

Fax (702) 434-1488

[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)

*Governor, American Association of Justice (AAJ)*

*Governor, Nevada Justice Association (NJA)*

<image002.png>

---

From: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>

Sent: Friday, October 16, 2020 2:05 PM

To: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgroupnv.com](mailto:kdoyle@doylelawgroupnv.com)>

Cc: Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>; Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>

Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Christian –

Transcript is attached. Thanks.

Prescott T. Jones, Esq.

Resnick & Louis, P.C.

8925 West Russell Road, Suite 220

Las Vegas, NV 89148

Direct Phone: 702-997-1029

[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)

<http://www.rlattorneys.com>

<image001.png>

ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI |  
ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA |  
LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>

Sent: Friday, October 16, 2020 2:03 PM

To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgroupnv.com](mailto:kdoyle@doylelawgroupnv.com)>

Cc: Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>; Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Prescott,  
Can you please send the transcript?  
Thanks,

**Ms. Christian M. Morris, Esq.**  
**Managing Partner**  
2019 Nevada Trial Lawyer of the Year  
California Bar # 277641  
New Jersey Bar # 006362012  
Nevada Bar # 11218  
**NETTLES | MORRIS**  
[www.nettlesmorris.com](http://www.nettlesmorris.com)  
1389 Galleria Drive. Ste 200  
Henderson, NV 89014  
**Phone (702) 434-8282**  
Fax (702) 434-1488  
[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)  
*Governor, American Association of Justice (AAJ)*  
*Governor, Nevada Justice Association (NJA)*

<image002.png>

---

From: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>  
Sent: Friday, October 16, 2020 1:51 PM  
To: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgroupplv.com](mailto:kdoyle@doylelawgroupplv.com)>  
Cc: Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>; Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Christian,

Regarding Finding of Fact 4, the jury award was not overturned in favor of Dr. Lee as a result of the Judgment as a Matter of Law. Is there any reason by "The jury award in favor of Ton Vinh Less was not overturned" was not included in your proposed order?

I also note that you did not include my proposed Finding of Fact 7h - "The Court finds that Plaintiff, while admitting that each part of the statement was true, disputed that the statement when read as a whole was true." Please note the following from the transcript of the hearing:

THE COURT: 57 of the transcript.

MR. JONES: Yeah, I'm looking at page 39 of my PDF here, lines 19 to 21. The question was asked by Ms. Morris to my client.

"Q So what part of the statement is untrue?"

The answer by my client,

"A It's the whole or some and not just the parts."

I just want to make it clear that my client certainly --

THE COURT: Okay.

MR. JONES: -- didn't admit that the statement was true in its entirety, just simply the individual parts.

THE COURT: Okay. I appreciate that. And, certainly, if you want to make sure that that's in the findings of fact and conclusions of law, I understand. And Ms. Morris will prepare those, and she'll show them to you before we submit them to the Court.  
So I appreciate you've made that clear for the record, and we'll include that in the findings, okay.

Please let me know your thoughts on the above – thanks.

Prescott T. Jones, Esq.  
Resnick & Louis, P.C.  
8925 West Russell Road, Suite 220  
Las Vegas, NV 89148  
Direct Phone: 702-997-1029  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
<http://www.rlattorneys.com>

<image001.png>

ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI |  
ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA |  
LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>  
Sent: Tuesday, October 13, 2020 8:31 PM  
To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgroupplv.com](mailto:kdoyle@doylelawgroupplv.com)>  
Cc: Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>; Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Prescott,  
I received your e-mail and reviewed your proposed changes. I have incorporated a majority of them. A few I cannot, as they are not supported by the record. Please let me know if you agree to the new proposed Order so we can submit to Chambers.  
Thank you,

**Ms. Christian M. Morris, Esq.**  
**Managing Partner**  
2019 Nevada Trial Lawyer of the Year  
California Bar # 277641  
New Jersey Bar # 006362012  
Nevada Bar # 11218  
**NETTLES | MORRIS**  
[www.nettlesmorris.com](http://www.nettlesmorris.com)  
1389 Galleria Drive. Ste 200  
Henderson, NV 89014  
**Phone (702) 434-8282**  
Fax (702) 434-1488

[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)

*Governor, American Association of Justice (AAJ)*

*Governor, Nevada Justice Association (NJA)*

<image002.png>

---

From: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>

Sent: Tuesday, October 6, 2020 4:27 PM

To: Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgrouplv.com](mailto:kdoyle@doylelawgrouplv.com)>

Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>;

Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>

Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Christian,

I've reviewed your proposed order, the briefs filed by the parties, and the transcript of the hearing, and request the below revisions. If you disagree with any of the below, please let me know what portion of the transcript and/or briefing supports your proposed language. Thanks.

Findings of Fact No. 3 – should be changed to “The Court finds that, according to Court records, the lawsuit went to trial and Plaintiff Singletary received a jury award in its favor as against Ton Vinh Lee’s dental practice and the two other dentists who performed the procedure. Ton Vinh Lee received a verdict in favor and was awarded his costs from Plaintiff Singletary.”

Findings of Fact No. 4 – should be changed to “. . . overturning the jury award in favor of Plaintiff Singletary. The jury award in favor of Ton Vinh Lee was not overturned.”

Findings of Fact No. 5 – should be changed to “. . . after the jury award in favor of Plaintiff Singletary was overturned, an appeal was filed and the verdict in favor of Plaintiff Singletary was reinstated.”

Findings of Fact No. 7b – should be changed to “The Court finds that Plaintiff admits the jury trial resulted in a plaintiffs’ verdict against his practice and two other dentists who performed the procedure, but also noted that a verdict was rendered in his favor as against plaintiff Singletary.”

Findings of Fact No. 7d – “Reginald” is misspelled.

Findings of Fact No. 7e – “Summerlin Smiles” is misspelled.

Findings of Fact No. 7h needs to be added and read “The Court finds that Plaintiff, while admitting that each part of the statement was true, disputed that the statement when read as a whole was true.”

Conclusions of Law on page 3, lines 22-24 – the portion of the paragraph reading “attributed to official documetns or proceedings from the Singletary case, as the statement references the case name, per Adelson” should be removed, as the Court did not make this ruling. If you can point to something in the transcript where the Court made this ruling, please let me know.

Conclusions of Law on page 4, lines 9-11 needs to have “but did not like the way it read as a whole” needs to be removed and replaced with “but also disputed that the statement when read as a whole was true.” This is consistent with the deposition testimony provided by your client in her Motion and Reply.

Conclusions of Law on page 4, lines 14-15 need to be removed and replaced with "THE COURT FURTHER CONCLUDES that, while Defendants did not authenticate the deposition transcript from the deposition of Plaintiff, the Court accepts the transcript as the sworn testimony of the Plaintiff."

Conclusions of Law on page 4, line 17 – the portion reading "as Plaintiff admitted it was true" needs to be replaced with "as Plaintiff admitted each portion of the statement was true, while disagreeing with the truth of the statement as a whole." Alternatively, I would accept removal of the quoted portion without replacement.

Regards,

Prescott T. Jones, Esq.  
Resnick & Louis, P.C.  
8925 West Russell Road, Suite 220  
Las Vegas, NV 89148  
Direct Phone: 702-997-1029  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
<http://www.rlattorneys.com>

<image001.png>

ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI |  
ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA |  
LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>  
Sent: Tuesday, October 6, 2020 8:59 AM  
To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Kerry Doyle <[kdoyle@doylelawgroupplv.com](mailto:kdoyle@doylelawgroupplv.com)>  
Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>;  
Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hello Prescott and Kerry,

Just following up on the email below and the proposed Order. Please let us know as soon as you are able. Thank you.

### **Jenn Alexy**

Paralegal to Christian M. Morris, Esq.,  
Edward J. Wynder, Esq., and Tori R. Allen, Esq.  
**NETTLES | MORRIS**  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Direct Tel: (702) 763-6918  
Tel: (702) 434-8282 ext. 238  
Fax: (702) 786-0402

---

From: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>  
Sent: Thursday, October 1, 2020 3:39 PM  
To: Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>; Kerry Doyle <[kdoyle@doylelawgrouplv.com](mailto:kdoyle@doylelawgrouplv.com)>  
Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>;  
Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: RE: Lee vs. Patin: Order from 9/15 hearing

Hi Jenn,

I am in deposition today but should be able to review and respond back by tomorrow. Thanks.

Prescott T. Jones, Esq.  
Resnick & Louis, P.C.  
8925 West Russell Road, Suite 220  
Las Vegas, NV 89148  
Direct Phone: 702-997-1029  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
<http://www.rlattorneys.com>

<image001.png>

ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI |  
ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA |  
LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)>  
Sent: Thursday, October 1, 2020 3:30 PM  
To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Kerry Doyle <[kdoyle@doylelawgrouplv.com](mailto:kdoyle@doylelawgrouplv.com)>  
Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>; Myraleigh Alberto <[malberto@rlattorneys.com](mailto:malberto@rlattorneys.com)>;  
Susan Carbone <[scarbone@rlattorneys.com](mailto:scarbone@rlattorneys.com)>  
Subject: Lee vs. Patin: Order from 9/15 hearing

Hello,

Please see attached the draft Order granting Defendant Ingrid Patin's Motion for Summary Judgment and Patin Law Group's Joinder.

Please review and advise if any changes need to be made. If no changes are needed, please confirm your e-signature can be inserted for submission to the Court.

Thank you.

**Jenn Alexy**

Paralegal to Christian M. Morris, Esq.,  
Edward J. Wynder, Esq., and Tori R. Allen, Esq.  
**NETTLES | MORRIS**

1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Ton Lee, Plaintiff(s)

CASE NO: A-15-723134-C

7 vs.

DEPT. NO. Department 26

8 Ingrid Patin, Defendant(s)

9  
10 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 10/28/2020

15 "Christian M. Morris, Esq." . christianmorris@nettleslawfirm.com

16 "Jeremy J. Thompson, Esq." . jthompson@mpplaw.com

17 "Paul E Larsen, Esq." . plarsen@mpplaw.com

18 Coreene Drose . cdrose@rlattorneys.com

19 Cristina Robertson . crobertson@mpplaw.com

20 Debbie Surowiec . dsurowiec@mpplaw.com

21 Ingrid Patin . ingrid@patinlaw.com

22 Jenn Alexy . jenn@nettleslawfirm.com

23 Joyce Ulmer . julmer@mpplaw.com

24 Lisa Bell . lbell@rlattorneys.com

25 Nancy C. Rodriguez . nrodriguez@mpplaw.com

26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Prescott Jones .	pjones@rlattorneys.com
Christian Morris	christian@nettlesmorris.com
Susan Carbone	scarbone@rlattorneys.com
Jessica Humphrey	jhumphrey@rlattorneys.com
Tori Allen	victoria@nettlesmorris.com
Kerry Doyle	kdoyle@doylelawgroup.lv.com
Mikayla Hurtt	admin@doylelawgroup.lv.com
Emily Arriviello	emily@nettlesmorris.com
Myraleigh Alberto	malberto@rlattorneys.com



**ORDR**

CHRISTIAN M. MORRIS, ESQ.

Nevada Bar No. 11218

VICTORIA R. ALLEN, ESQ.

Nevada Bar No. 15005

NETTLES | MORRIS

1389 Galleria Drive, Suite 200

Henderson, Nevada 89014

Telephone: (702) 434-8282

Facsimile: (702) 434-1488

[brian@nettlesmorris.com](mailto:brian@nettlesmorris.com)

[christian@nettlesmorris.com](mailto:christian@nettlesmorris.com)

[victoria@nettlesmorris.com](mailto:victoria@nettlesmorris.com)

*Attorneys for Defendant, Ingrid Patin*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

TON VINH LEE, an individual;

Plaintiff,

vs.

INGRID PATIN, an individual, and  
PATIN LAW GROUP, PLLC, a Nevada  
Professional LLC,

Defendants.

CASE NO.: A-15-723134-C

DEPT NO.: XXVI

**ORDER DENYING PLAINTIFF'S MOTION TO ALTER/AMEND JUDGMENT AND  
ORDER CONTINUING PLAINTIFF'S MOTION FOR RECONSIDERATION,  
DEFENDANT INGRID PATIN'S MOTIONS FOR FEES, COSTS, AND INTEREST  
AND DEFENDANT PATIN LAW GROUP, PLLC'S MOTION FOR ATTORNEYS  
FEES AND INTEREST**

On January 6, 2021, at 9:30 a.m., the above-captioned case came before the Honorable Judge Nancy Becker, regarding Plaintiff TON VINH LEE'S *Motion to Alter/Amend Judgment*, Plaintiff TON VINH LEE'S *Motion for Reconsideration*, Defendant INGRID PATIN'S *Motion for Attorney's Fees, Costs, and Interest*, and Defendant PATIN LAW GROUP, PLLC'S *Motion for Attorney's Fees and Interest* with Christian M. Morris, Esq. of Nettles Morris appearing on behalf of INGRID PATIN, Kerry J. Doyle, Esq. of Doyle Law Group appearing on behalf of

**Case Name: Ton Vinh Lee v. Ingrid Patin**

**Case Number: A-15-723134-C**

PATIN LAW GROUP, PLLC, and Prescott T. Jones of RESNICK & LOUIS, PC appearing on behalf of Plaintiff TON VINH LEE. The Court, having reviewed this Motion, the papers and pleadings on file herein, and the arguments of counsel, finds and orders as follows:

**FINDINGS OF FACT**

1. The Court finds that Plaintiff's Motion to Alter/Amend Judgment and Plaintiff's Motion for Reconsideration were the same and thus there is no mechanism to have both motions.
2. The Court finds that the remaining Motions will be continued in order to be heard with Judge Sturman, on February 9, 2021 at 9:30 a.m.

**ORDER**

**IT IS ORDERED THAT,** Plaintiff's *Motion to Alter/Amend Judgment* is DENIED.

**IT IS FURTHER ORDER THAT,** Plaintiff's *Motion for Reconsideration*, Defendant Ingrid Patin's *Motion for Attorney's Fees, Costs, and Interest*, and Defendant Patin Law Group, PLLC's *Motion for Attorney's Fees and Interest* is continued to February 9, 2021 at 9:30 a.m.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2021.  
~~Dated this 21st day of January, 2021~~



DISTRICT COURT JUDGE

E88 AD6 0567 131C

for Judge Becker

DATED this 20<sup>th</sup> day of January, 2021. ~~DATED this 20<sup>th</sup> day of January, 2021.~~  
Gloria Sturman  
District Court Judge

NETTLES | MORRIS

RESNICK & LOUIS, P.C.

/s/ Christian M. Morris

/s/ Prescott Jones

CHRISTIAN M. MORRIS, ESQ.

PRESCOTT JONES, ESQ.

Nevada Bar No. 11218

Nevada Bar No. 11617

1389 Galleria Drive, Suite 200

8925 W. Russell Road, Suite 220

Henderson, Nevada 89014

Las Vegas, Nevada 89148

*Attorneys for Defendant, Ingrid Patin*

*Attorneys for Plaintiff, Ton Vinh Lee*

*Case Name: Ton Vinh Lee v. Ingrid Patin*

*Case Number: A-15-723134-C*

DATED this 20<sup>th</sup> day of January, 2021.

DOYLE LAW GROUP

/s/ Kerry J. Doyle

KERRY J. DOYLE, ESQ.

Nevada Bar No. 10571

7375 S. Pecos Rd., #101

Las Vegas, Nevada 89120

*Attorneys for Defendant, Patin Law Group,*

*PLLC*

## Jenn Alexy

---

**From:** Prescott Jones <pjones@rlattorneys.com>  
**Sent:** Wednesday, January 20, 2021 4:14 PM  
**To:** Jenn Alexy  
**Cc:** Christian Morris; Kerry Doyle  
**Subject:** RE: Patin adv. Lee \*Order from 1/6/21 Hearing\*

Approved. Please include my e-signature.

Prescott T. Jones, Esq.  
Resnick & Louis, P.C.  
8925 West Russell Road, Suite 220  
Las Vegas, NV 89148  
Direct Phone: 702-997-1029  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
<http://www.rlattorneys.com>



ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI | ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA | LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Jenn Alexy <Jenn@nettlesmorris.com>  
Sent: Wednesday, January 20, 2021 10:17 AM  
To: Prescott Jones <pjones@rlattorneys.com>  
Cc: Christian Morris <Christian@nettlesmorris.com>; Kerry Doyle <kdoyle@doylelawgroupnv.com>  
Subject: FW: Patin adv. Lee \*Order from 1/6/21 Hearing\*

Hello,

Following up on the attached draft Order from the 1/6/21 hearing. Please review and advise if any changes need to be made. If no changes are needed, please confirm your e-signature can be inserted for filing with the Court. Thank you.

## Jenn Alexy

Paralegal to Christian M. Morris, Esq.,  
Edward J. Wynder, Esq., and Tori R. Allen, Esq.  
**NETTLES | MORRIS**  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Direct Office Tel: (702) 763-6918  
Cell: (702) 274-7114

Tel: (702) 434-8282 ext. 238

Fax: (702) 786-0402

---

From: Jenn Alexy

Sent: Thursday, January 14, 2021 11:24 AM

To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Kerry Doyle <[kdoyle@doylelawgroupnv.com](mailto:kdoyle@doylelawgroupnv.com)>

Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>

Subject: Patin adv. Lee \*Order from 1/6/21 Hearing\*

Counsel,

Please see attached the draft Order from the 1/6/21 hearing for the above-referenced case.

Please review and advise if any changes need to be made. If no changes are needed, please confirm your e-signature can be inserted for filing with the Court. Thank you.

**Jenn Alexy**

Paralegal to Christian M. Morris, Esq.,

Edward J. Wynder, Esq., and Tori R. Allen, Esq.

**NETTLES | MORRIS**

1389 Galleria Drive, Suite 200

Henderson, Nevada 89014

Direct Office Tel: (702) 763-6918

Cell: (702) 274-7114

Tel: (702) 434-8282 ext. 238

Fax: (702) 786-0402

## Jenn Alexy

---

**From:** Kerry Doyle <kdoyle@doylelawgrouplv.com>  
**Sent:** Wednesday, January 20, 2021 10:28 AM  
**To:** Jenn Alexy  
**Subject:** Re: Patin adv. Lee \*Order from 1/6/21 Hearing\*

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Red Category

E-sig is fine.

Kerry J. Doyle, Esq.  
Doyle Law Group  
7375 S. Pecos Rd. #101  
Las Vegas, NV 89120  
702.706.3323 (general)  
702.921.7823 (fax)  
[kdoyle@DoyleLawGroupLV.com](mailto:kdoyle@DoyleLawGroupLV.com)  
[www.DoyleLawGroupLV.com](http://www.DoyleLawGroupLV.com)



NOTICE: The information contained in this electronic message is intended only for the personal and confidential use of the designated recipient(s) named above. This message may be attorney-client communication, and as such, is privileged and confidential. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error, and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone or return e-mail and permanently destroy all original messages. Thank you.

On Jan 20, 2021, at 10:17 AM, Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)> wrote:

Hello,

Following up on the attached draft Order from the 1/6/21 hearing. Please review and advise if any changes need to be made. If no changes are needed, please confirm your e-signature can be inserted for filing with the Court. Thank you.

### Jenn Alexy

Paralegal to Christian M. Morris, Esq.,  
Edward J. Wynder, Esq., and Tori R. Allen, Esq.  
**NETTLES | MORRIS**  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014

Direct Office Tel: (702) 763-6918  
Cell: (702) 274-7114  
Tel: (702) 434-8282 ext. 238  
Fax: (702) 786-0402

---

From: Jenn Alexy  
Sent: Thursday, January 14, 2021 11:24 AM  
To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Kerry Doyle <[kdoyle@doylelawgroupnv.com](mailto:kdoyle@doylelawgroupnv.com)>  
Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>  
Subject: Patin adv. Lee \*Order from 1/6/21 Hearing\*

Counsel,

Please see attached the draft Order from the 1/6/21 hearing for the above-referenced case.

Please review and advise if any changes need to be made. If no changes are needed, please confirm your e-signature can be inserted for filing with the Court. Thank you.

**Jenn Alexy**

Paralegal to Christian M. Morris, Esq.,  
Edward J. Wynder, Esq., and Tori R. Allen, Esq.

**NETTLES | MORRIS**

1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Direct Office Tel: (702) 763-6918  
Cell: (702) 274-7114  
Tel: (702) 434-8282 ext. 238  
Fax: (702) 786-0402

<Order on Pltfs Mot for Recons. and Defts Attorneys Fees and Costs.pdf><Order on Pltfs Mot for Recons. and Defts Attorneys Fees and Costs.doc>

1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Ton Lee, Plaintiff(s)

CASE NO: A-15-723134-C

7 vs.

DEPT. NO. Department 26

8 Ingrid Patin, Defendant(s)

9  
10 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 1/21/2021

15 "Christian M. Morris, Esq." . christianmorris@nettleslawfirm.com

16 "Jeremy J. Thompson, Esq." . jthompson@mpplaw.com

17 "Paul E Larsen, Esq." . plarsen@mpplaw.com

18 Coreene Drose . cdrose@rlattorneys.com

19 Cristina Robertson . crobertson@mpplaw.com

20 Debbie Surowiec . dsurowiec@mpplaw.com

21 Ingrid Patin . ingrid@patinlaw.com

22 Jenn Alexy . jenn@nettleslawfirm.com

23 Joyce Ulmer . julmer@mpplaw.com

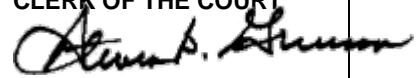
24 Lisa Bell . lbell@rlattorneys.com

25 Nancy C. Rodriguez . nrodriguez@mpplaw.com

26  
27  
28



1	Prescott Jones .	pjones@rlattorneys.com
2	Christian Morris	christian@nettlesmorris.com
3	Tori Allen	victoria@nettlesmorris.com
4	Kerry Doyle	kdoyle@doylelawgroup.lv.com
5	Mikayla Hurtt	admin@doylelawgroup.lv.com
6	Emily Arriviello	emily@nettlesmorris.com
7	Myraleigh Alberto	malberto@rlattorneys.com
8	Brittany Willis	bwillis@rlattorneys.com
9	Susan Carbone	Scarbone@rlattorneys.com
10	Jessica Humphrey	Jhumphrey@rlattorneys.com
11	Melanie Herman	mail@rlattorneys.com
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		



NEOJ  
CHRISTIAN M. MORRIS, ESQ.  
Nevada Bar No. 11218  
NETTLES | MORRIS  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Telephone: (702) 434-8282  
Facsimile: (702) 434-1488  
[christian@nettlesmorris.com](mailto:christian@nettlesmorris.com)  
*Attorney for Defendant, Ingrid Patin*

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

TON VINH LEE, an individual,  
  
Plaintiff,

v.

INGRID PATIN, an individual, and PATIN  
LAW GROUP, PLLC, a Nevada  
Professional LLC,  
  
Defendants.

CASE NO.: A-15-723134-C  
DEPT NO.: 26

**NOTICE OF ENTRY OF ORDER**

TO: ALL PARTIES; and  
TO: THEIR RESPECTIVE ATTORNEYS:

**PLEASE TAKE NOTICE** that an Order denying Plaintiff's Motion to Alter/Amend Judgment and Order Continuing Plaintiff's Motion for Reconsideration, Defendant Ingrid Patin's Motions for Fees, Costs, and Interest and Defendant Patin Law Group, PLLC's Motion for Attorneys Fees and Interest was duly entered in the above-entitled matter on the 21<sup>st</sup> day of January, 2021, a true and correct copy of said Order is attached hereto.

DATED this 21<sup>st</sup> day of January, 2021.

NETTLES | MORRIS



CHRISTIAN M. MORRIS, ESQ.  
Nevada Bar No. 011218  
*Attorney for Defendant, Ingrid Patin*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

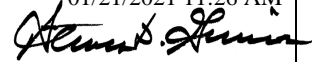
Pursuant to NEFCR 9, NRCP 5(b) and EDCR 7.26, I hereby certify that on this 21<sup>st</sup> day of January, 2021, a true and correct copy of the foregoing **NOTICE OF ENTRY OF ORDER** was served to the following parties by electronic transmission through the Odyssey eFileNV system and/or by depositing in the US Mail, postage prepaid, addressed as follows:

Kerry Doyle	kdoyle@doylelawgrouplv.com
Mikayla Hurtt	admin@doylelawgrouplv.com
Coreene Drose	cdrose@rlattorneys.com
Ingrid Patin	ingrid@patinlaw.com
Lisa Bell	lbell@rlattorneys.com
Prescott Jones	pjones@rlattorneys.com
Susan Carbone	scarbone@rlattorneys.com
Jessica Humphrey	jhumphrey@rlattorneys.com



---

An Employee of NETTLES | MORRIS

  
CLERK OF THE COURT

**NETTLES | MORRIS**  
1389 Galleria Drive Suite 200  
Henderson, NV 89014  
(702) 434-8282 / (702) 434-1488 (fax)

**ORDR**

CHRISTIAN M. MORRIS, ESQ.

Nevada Bar No. 11218

VICTORIA R. ALLEN, ESQ.

Nevada Bar No. 15005

NETTLES | MORRIS

1389 Galleria Drive, Suite 200

Henderson, Nevada 89014

Telephone: (702) 434-8282

Facsimile: (702) 434-1488

[brian@nettlesmorris.com](mailto:brian@nettlesmorris.com)

[christian@nettlesmorris.com](mailto:christian@nettlesmorris.com)

[victoria@nettlesmorris.com](mailto:victoria@nettlesmorris.com)

*Attorneys for Defendant, Ingrid Patin*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

TON VINH LEE, an individual;

Plaintiff,

vs.

INGRID PATIN, an individual, and  
PATIN LAW GROUP, PLLC, a Nevada  
Professional LLC,

Defendants.

CASE NO.: A-15-723134-C

DEPT NO.: XXVI

**ORDER DENYING PLAINTIFF'S MOTION TO ALTER/AMEND JUDGMENT AND  
ORDER CONTINUING PLAINTIFF'S MOTION FOR RECONSIDERATION,  
DEFENDANT INGRID PATIN'S MOTIONS FOR FEES, COSTS, AND INTEREST  
AND DEFENDANT PATIN LAW GROUP, PLLC'S MOTION FOR ATTORNEYS  
FEES AND INTEREST**

On January 6, 2021, at 9:30 a.m., the above-captioned case came before the Honorable Judge Nancy Becker, regarding Plaintiff TON VINH LEE'S *Motion to Alter/Amend Judgment*, Plaintiff TON VINH LEE'S *Motion for Reconsideration*, Defendant INGRID PATIN'S *Motion for Attorney's Fees, Costs, and Interest*, and Defendant PATIN LAW GROUP, PLLC'S *Motion for Attorney's Fees and Interest* with Christian M. Morris, Esq. of Nettles Morris appearing on behalf of INGRID PATIN, Kerry J. Doyle, Esq. of Doyle Law Group appearing on behalf of

*Case Name: Ton Vinh Lee v. Ingrid Patin*

*Case Number: A-15-723134-C*

PATIN LAW GROUP, PLLC, and Prescott T. Jones of RESNICK & LOUIS, PC appearing on behalf of Plaintiff TON VINH LEE. The Court, having reviewed this Motion, the papers and pleadings on file herein, and the arguments of counsel, finds and orders as follows:

**FINDINGS OF FACT**

1. The Court finds that Plaintiff's Motion to Alter/Amend Judgment and Plaintiff's Motion for Reconsideration were the same and thus there is no mechanism to have both motions.
2. The Court finds that the remaining Motions will be continued in order to be heard with Judge Sturman, on February 9, 2021 at 9:30 a.m.

**ORDER**

**IT IS ORDERED THAT,** Plaintiff's *Motion to Alter/Amend Judgment* is DENIED.

**IT IS FURTHER ORDER THAT,** Plaintiff's *Motion for Reconsideration*, Defendant Ingrid Patin's *Motion for Attorney's Fees, Costs, and Interest*, and Defendant Patin Law Group, PLLC's *Motion for Attorney's Fees and Interest* is continued to February 9, 2021 at 9:30 a.m.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2021.  
~~Dated this 21st day of January, 2021~~



DISTRICT COURT JUDGE

E88 AD6 0567 131C

for Judge Becker

DATED this 20<sup>th</sup> day of January, 2021. ~~DATED this 20<sup>th</sup> day of January, 2021.~~  
Gloria Sturman  
District Court Judge

NETTLES | MORRIS

RESNICK & LOUIS, P.C.

/s/ Christian M. Morris

/s/ Prescott Jones

CHRISTIAN M. MORRIS, ESQ.

PRESCOTT JONES, ESQ.

Nevada Bar No. 11218

Nevada Bar No. 11617

1389 Galleria Drive, Suite 200

8925 W. Russell Road, Suite 220

Henderson, Nevada 89014

Las Vegas, Nevada 89148

*Attorneys for Defendant, Ingrid Patin*

*Attorneys for Plaintiff, Ton Vinh Lee*

*Case Name: Ton Vinh Lee v. Ingrid Patin*

*Case Number: A-15-723134-C*

DATED this 20<sup>th</sup> day of January, 2021.

DOYLE LAW GROUP

/s/ Kerry J. Doyle

KERRY J. DOYLE, ESQ.

Nevada Bar No. 10571

7375 S. Pecos Rd., #101

Las Vegas, Nevada 89120

*Attorneys for Defendant, Patin Law Group,*

*PLLC*

## Jenn Alexy

---

**From:** Prescott Jones <pjones@rlattorneys.com>  
**Sent:** Wednesday, January 20, 2021 4:14 PM  
**To:** Jenn Alexy  
**Cc:** Christian Morris; Kerry Doyle  
**Subject:** RE: Patin adv. Lee \*Order from 1/6/21 Hearing\*

Approved. Please include my e-signature.

Prescott T. Jones, Esq.  
Resnick & Louis, P.C.  
8925 West Russell Road, Suite 220  
Las Vegas, NV 89148  
Direct Phone: 702-997-1029  
[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)  
<http://www.rlattorneys.com>



ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI | ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA | LONDON, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

---

From: Jenn Alexy <Jenn@nettlesmorris.com>  
Sent: Wednesday, January 20, 2021 10:17 AM  
To: Prescott Jones <pjones@rlattorneys.com>  
Cc: Christian Morris <Christian@nettlesmorris.com>; Kerry Doyle <kdoyle@doylelawgroupnv.com>  
Subject: FW: Patin adv. Lee \*Order from 1/6/21 Hearing\*

Hello,

Following up on the attached draft Order from the 1/6/21 hearing. Please review and advise if any changes need to be made. If no changes are needed, please confirm your e-signature can be inserted for filing with the Court. Thank you.

## Jenn Alexy

Paralegal to Christian M. Morris, Esq.,  
Edward J. Wynder, Esq., and Tori R. Allen, Esq.  
**NETTLES | MORRIS**  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Direct Office Tel: (702) 763-6918  
Cell: (702) 274-7114

Tel: (702) 434-8282 ext. 238

Fax: (702) 786-0402

---

From: Jenn Alexy

Sent: Thursday, January 14, 2021 11:24 AM

To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Kerry Doyle <[kdoyle@doylelawgroupnv.com](mailto:kdoyle@doylelawgroupnv.com)>

Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>

Subject: Patin adv. Lee \*Order from 1/6/21 Hearing\*

Counsel,

Please see attached the draft Order from the 1/6/21 hearing for the above-referenced case.

Please review and advise if any changes need to be made. If no changes are needed, please confirm your e-signature can be inserted for filing with the Court. Thank you.

**Jenn Alexy**

Paralegal to Christian M. Morris, Esq.,

Edward J. Wynder, Esq., and Tori R. Allen, Esq.

**NETTLES | MORRIS**

1389 Galleria Drive, Suite 200

Henderson, Nevada 89014

Direct Office Tel: (702) 763-6918

Cell: (702) 274-7114

Tel: (702) 434-8282 ext. 238

Fax: (702) 786-0402



## Jenn Alexy

---

**From:** Kerry Doyle <kdoyle@doylelawgrouplv.com>  
**Sent:** Wednesday, January 20, 2021 10:28 AM  
**To:** Jenn Alexy  
**Subject:** Re: Patin adv. Lee \*Order from 1/6/21 Hearing\*

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Red Category

E-sig is fine.

Kerry J. Doyle, Esq.  
Doyle Law Group  
7375 S. Pecos Rd. #101  
Las Vegas, NV 89120  
702.706.3323 (general)  
702.921.7823 (fax)  
[kdoyle@DoyleLawGroupLV.com](mailto:kdoyle@DoyleLawGroupLV.com)  
[www.DoyleLawGroupLV.com](http://www.DoyleLawGroupLV.com)



NOTICE: The information contained in this electronic message is intended only for the personal and confidential use of the designated recipient(s) named above. This message may be attorney-client communication, and as such, is privileged and confidential. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error, and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone or return e-mail and permanently destroy all original messages. Thank you.

On Jan 20, 2021, at 10:17 AM, Jenn Alexy <[Jenn@nettlesmorris.com](mailto:Jenn@nettlesmorris.com)> wrote:

Hello,

Following up on the attached draft Order from the 1/6/21 hearing. Please review and advise if any changes need to be made. If no changes are needed, please confirm your e-signature can be inserted for filing with the Court. Thank you.

**Jenn Alexy**

Paralegal to Christian M. Morris, Esq.,  
Edward J. Wynder, Esq., and Tori R. Allen, Esq.  
**NETTLES | MORRIS**  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014

Direct Office Tel: (702) 763-6918  
Cell: (702) 274-7114  
Tel: (702) 434-8282 ext. 238  
Fax: (702) 786-0402

---

From: Jenn Alexy  
Sent: Thursday, January 14, 2021 11:24 AM  
To: Prescott Jones <[pjones@rlattorneys.com](mailto:pjones@rlattorneys.com)>; Kerry Doyle <[kdoyle@doylelawgroupnv.com](mailto:kdoyle@doylelawgroupnv.com)>  
Cc: Christian Morris <[Christian@nettlesmorris.com](mailto:Christian@nettlesmorris.com)>  
Subject: Patin adv. Lee \*Order from 1/6/21 Hearing\*

Counsel,

Please see attached the draft Order from the 1/6/21 hearing for the above-referenced case.

Please review and advise if any changes need to be made. If no changes are needed, please confirm your e-signature can be inserted for filing with the Court. Thank you.

**Jenn Alexy**

Paralegal to Christian M. Morris, Esq.,  
Edward J. Wynder, Esq., and Tori R. Allen, Esq.

**NETTLES | MORRIS**

1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
Direct Office Tel: (702) 763-6918  
Cell: (702) 274-7114  
Tel: (702) 434-8282 ext. 238  
Fax: (702) 786-0402

<Order on Pltfs Mot for Recons. and Defts Attorneys Fees and Costs.pdf><Order on Pltfs Mot for Recons. and Defts Attorneys Fees and Costs.doc>

1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Ton Lee, Plaintiff(s)

CASE NO: A-15-723134-C

7 vs.

DEPT. NO. Department 26

8 Ingrid Patin, Defendant(s)

9  
10 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 1/21/2021

15 "Christian M. Morris, Esq." . christianmorris@nettleslawfirm.com

16 "Jeremy J. Thompson, Esq." . jthompson@mpplaw.com

17 "Paul E Larsen, Esq." . plarsen@mpplaw.com

18 Coreene Drose . cdrose@rlattorneys.com

19 Cristina Robertson . crobertson@mpplaw.com

20 Debbie Surowiec . dsurowiec@mpplaw.com

21 Ingrid Patin . ingrid@patinlaw.com

22 Jenn Alexy . jenn@nettleslawfirm.com

23 Joyce Ulmer . julmer@mpplaw.com

24 Lisa Bell . lbell@rlattorneys.com

25 Nancy C. Rodriguez . nrodriguez@mpplaw.com

26  
27  
28

1	Prescott Jones .	pjones@rlattorneys.com
2	Christian Morris	christian@nettlesmorris.com
3	Tori Allen	victoria@nettlesmorris.com
4	Kerry Doyle	kdoyle@doylelawgroup.lv.com
5	Mikayla Hurtt	admin@doylelawgroup.lv.com
6	Emily Arriviello	emily@nettlesmorris.com
7	Myraleigh Alberto	malberto@rlattorneys.com
8	Brittany Willis	bwillis@rlattorneys.com
9	Susan Carbone	Scarbone@rlattorneys.com
10	Jessica Humphrey	Jhumphrey@rlattorneys.com
11	Melanie Herman	mail@rlattorneys.com
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort****COURT MINUTES****October 14, 2015**

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

**October 14, 2015      9:00 AM      Motion to Dismiss**

**HEARD BY:** Togliatti, Jennifer**COURTROOM:** RJC Courtroom 10C**COURT CLERK:** Athena Trujillo**RECORDER:** Yvette G. Sison**REPORTER:****PARTIES**

**PRESENT:**      Jones, Prescott T.      Attorney  
                         Morris, Christian      Attorney

**JOURNAL ENTRIES**

- Court made a record of all documents reviewed. Ms. Morris advised an anti-slap law may also be applicable and noted the bar complaint has been dealt with. Court advised it does not think professional conduct is relevant and the motion is really a Motion for Summary Judgment. Court reviewed the statement made and noted the verdict was against a dba, which is not a legal entity. Court requested information as to who owns the dba corporation. Ms. Morris advised she can get the information from the Secretary of State, noting that she believes Summerlin Smiles is owned by Ton V. Lee. Colloquy regarding the owner. Mr. Jones argued there is no verdict against his client as it was vacated by the Judge, although it is on appeal. Court made a record of Exhibit B and the 12 page order it has reviewed. Colloquy regarding the documenting statement. Mr. Jones objected to the statement of facts since they did not have an opportunity to respond. **COURT ORDERED**, motion **DENIED WITHOUT PREJUDICE**, noting any further motions must be re-filed. Further, Court noted if the Motion is treated as a Motion for Summary Judgment the motion is denied 56F. Mr. Jones to prepare the order and submit to opposing counsel prior to final submission to the Court.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**November 18, 2015**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**November 18, 2015      9:00 AM**

**All Pending Motions**

**HEARD BY:** Togliatti, Jennifer

**COURTROOM:** RJC Courtroom 10C

**COURT CLERK:** Athena Trujillo

**RECORDER:** Yvette G. Sison

**REPORTER:**

**PARTIES**

**PRESENT:**      Jones, Prescott T.      Attorney  
                         Morris, Christian      Attorney  
                         Patin, Ingrid      Defendant

**JOURNAL ENTRIES**

- DEFENDANTS' SPECIAL MOTION TO DISMISS PURSUANT TO NEVADA REVISED STATUTE 41.635-70 OR IN THE ALTERNATIVE MOTION TO DISMISS PURSUANT TO NRS 12(B)(5) ... PLAINTIFF'S MOTION TO STRIKE DEFENDANTS' REPLY IN SUPPORT OF SPECIAL MOTION TO DISMISS; OR IN THE ALTERNATIVE PLAINTIFF'S MOTION TO CONTINUE HEARING ON ORDER SHORTENING TIME

Mr. Jones argued the Plaintiff's Motion is untimely and argued for the reply to be stricken, noting there are arguments made for the first time in the brief. Ms. Morris argued there are no new facts in the brief. COURT ORDERED, Plaintiff Motion to Strike Defendant's Reply in Support of Special Motion to Dismiss DENIED; Motion to Continued GRANTED to allow a sur-reply to be filed.

12/02/15 9:00 AM DEFENDANTS' SPECIAL MOTION TO DISMISS PURSUANT TO NEVADA REVISED STATUTE 41.635-70 OR IN THE ALTERNATIVE MOTION TO DISMISS PURSUANT TO NRS 12(B)(5)

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort****COURT MINUTES****December 02, 2015**

A-15-723134-C      Ton Lee, Plaintiff(s)  
                                  vs.  
                                  Ingrid Patin, Defendant(s)

**December 02, 2015      9:00 AM      Motion to Dismiss**

**HEARD BY:** Togliatti, Jennifer**COURTROOM:** RJC Courtroom 10C**COURT CLERK:** Athena Trujillo**RECORDER:** Yvette G. Sison**REPORTER:****PARTIES**

<b>PRESENT:</b>	Hotchkin, August B., ESQ	Attorney
	Jones, Prescott T.	Attorney
	Morris, Christian	Attorney
	Patin, Ingrid	Defendant

**JOURNAL ENTRIES**

- Also present: Edward Wynder, Esq. on behalf of Defendant.

Ms. Morris argued in support of the motion, noting that the statement is accurate. Further, Ms. Morris argued that it is free speech and an issue for public concern. Ms. Morris advised the Plaintiff must prove a false and defamatory statement and they cannot prove damages. With respect to the Motion to Dismiss, Ms. Morris argued that Ton V. Lee DDS is the owner of Summerlin Smiles and the statement in the advertisement is factually correct. Mr. Jones argued there is no verdict for the Plaintiff. Upon Court's inquiry, Mr. Jones advised the Plaintiff filed a counter appeal for fees and costs only, not for any verdict unless the Nevada Supreme Court reverses the Judge's ruling. Mr. Jones further argued against the motion noting the statement is defamatory and that the verdict as vacated. Further argument by counsel. COURT ORDERED, matter UNDER ADVISEMENT and matter SET for status check, noting a minute order will issue.

12/09/15 (CHAMBERS) STATUS CHECK: DECISION

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**December 09, 2015**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**December 09, 2015      3:00 AM      Status Check**

**HEARD BY:** Togliatti, Jennifer

**COURTROOM:** No Location

**COURT CLERK:** Athena Trujillo

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- COURT ORDERED, matter CONTINUED.

CONTINUED TO: 1/13/16 (CHAMBERS)



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort****COURT MINUTES****January 13, 2016**

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

**January 13, 2016      3:00 AM      Status Check**

**HEARD BY:** Togliatti, Jennifer**COURTROOM:** No Location**COURT CLERK:** Phyllis Irby**RECORDER:****REPORTER:****PARTIES****PRESENT:**

**JOURNAL ENTRIES**

- This Court having considered the Defendants Special Motion to Dismiss Pursuant to NRS 41.635-70, or in the Alternative Motion to Dismiss Pursuant to NRS 12(b)(5), all related pleadings, and oral arguments of counsel, first FINDS Defendants Motion is timely filed pursuant to NRS 41.660. Next, this Court FINDS the communication at issue (as detailed by the Plaintiff in his Opposition to this Motion) under the circumstances of the nature, content, and location of the communication is not a good faith communication in furtherance of the right to petition or the right to free speech in direct connection with an issue of public concern. Specifically, NRS 41.637(3) doesn't apply because the communication does not reference an appeal, nor does there appear to be any connection to the communication and its timing to any purpose other than attorney advertising. NRS 41.637(4) does not apply because it appears there is no direct connection to a matter of public interest, and instead it appears to be for the purpose of attorney advertising.

However, even if NRS 41.637(3) or (4) did apply to complained of communication, this Court cannot find at this juncture that the Plaintiff hasn't put forth prima facie evidence demonstrating a probability of prevailing on this claim. This is particularly true because the truth or falsity of an allegedly defamatory statement is an issue for the jury to determine. *Posadas v. City of Reno*, 109 Nev. 448, 453 (1993). Further, because if found to be defamatory and the statement is such that would tend to injure the Plaintiff in his business or profession, then it will be deemed defamation per se and

damages will be presumed. Nevada Ind. Broadcasting v. Allen, 99 Nev. 404, 409 (1983). Therefore, for the reasons stated herein Court ORDERS Special Motion to Dismiss pursuant to Nevada's anti-SLAPP laws DENIED.

Next, this Court FINDS all of Defendants' other arguments are not properly decided in a Motion to Dismiss and/or are without merit and ORDERS Defendants' Alternative 12(b)(5) Motion to Dismiss DENIED. Further, this Court DENIES Plaintiff's Countermotion for attorney's fees and costs as this Court does not find the special motion to be frivolous or vexatious. Further, the misstatement of the evidentiary burden cannot be considered more than a harmless error on the part of counsel considering the facts here.

Finally, this Court notes that the parties have not in any Motion to Dismiss thus far distinguished between allegations of conduct of the individual Defendant versus the corporate Defendant, and therefore, this Court notes that any rulings herein and regarding the previous Motion to Dismiss do not address that issue. Counsel for the Plaintiff is to prepare the proposed order tracking the language of this minute order and allow for Defendants' counsel's signature as to form and content.

CLERK'S NOTE: A copy of this Minute Order shall be placed in the Attorney folders for the following:

Prescott T. Jones, Esq., August B. Hotchkin, Esq., and Bremer Whyte Brown & O'Meara LLP./pi

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**February 10, 2016**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**February 10, 2016      9:30 AM      Motion to Strike**

**HEARD BY:** Togliatti, Jennifer

**COURTROOM:** RJC Courtroom 10C

**COURT CLERK:** Athena Trujillo

**RECORDER:** Yvette G. Sison

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Jones, Prescott T.	Attorney
	Morris, Christian	Attorney
	Patin, Ingrid	Defendant

**JOURNAL ENTRIES**

- Court made a record of all documents reviewed. Mr. Jones argued in support of the motion, noting a subsequent 12(b) motion cannot be filed after the first 12(b) motion was filed. Further, Mr. Jones moved to strike the Motion to Dismiss and requested the answer be filed. Ms. Morris argued the motion was filed for a failure to state a claim against the Defendant individually and there is not a claim against the LLC. Upon Court's inquiry, Ms. Morris advised the LLC has not answered yet as time has not run out yet. Further argument by counsel. COURT ORDERED, matter CONTINUED for decision, noting a minute order will issue.

CONTINUED TO: 2/17/16 (CHAMBERS)

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**February 16, 2016**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**February 16, 2016      3:00 AM      Motion to Strike**

**HEARD BY:** Togliatti, Jennifer      **COURTROOM:** No Location

**COURT CLERK:** Athena Trujillo

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- This Court, having considered the motion to Strike Defendants Third-Filed Motion to Dismiss Pursuant to NRCP 12(b)(5), the Opposition to the Motion, Reply in Support of Motion, and oral arguments of counsel ORDERS the Motion to Strike DENIED. Further, this Court ORDERS the Defendants Countermotion for Attorney s Fees and Costs DENIED, as the Court does not find that the Motion was filed for the purposes of harassment. Counsel for Defendants is directed to prepare the proposed order for the Court s signature.

CLERK'S NOTE: A copy of this minute order has been e-mailed to Prescott Jones, Esq. and Christian Morris, Esq.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort****COURT MINUTES****March 09, 2016**

A-15-723134-C      Ton Lee, Plaintiff(s)  
                                  vs.  
                                  Ingrid Patin, Defendant(s)

**March 09, 2016      9:00 AM      Motion to Dismiss**

**HEARD BY:** Togliatti, Jennifer      **COURTROOM:** RJC Courtroom 10C

**COURT CLERK:** Athena Trujillo

**RECORDER:** Yvette G. Sison

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Jones, Prescott T.	Attorney
	Morris, Christian	Attorney
	Patin, Ingrid	Defendant

**JOURNAL ENTRIES**

- Argument by Ms. Morris, noting the First Amended Complaint is a rogue document and cannot be addressed. Mr. Jones argued they are allowed to amend the complaint. Further arguments by counsel in support of their respective positions. Court noted Mr. Jones has advised he will only focus on the alleged tortuous acts. COURT Sua Sponte ORDERED Mr. Jones to file a Second Amended Complaint to remove the allegations of alter ego and noted that no discovery into the corporate assets, bank accounts, or anything solely related to alter ego will be allowed. Further, Court noted any language as to personal gain is to be STRICKEN. COURT ORDERED, Motion CONTINUED to the Court's Chamber Calendar for decision.

CONTINUED TO: 3/16/16 (CHAMBERS)

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**March 16, 2016**

---

A-15-723134-C	Ton Lee, Plaintiff(s) vs. Ingrid Patin, Defendant(s)
---------------	--

---

<b>March 16, 2016</b>	<b>3:00 AM</b>	<b>Motion to Dismiss</b>
-----------------------	----------------	--------------------------

<b>HEARD BY:</b> Togliatti, Jennifer	<b>COURTROOM:</b> No Location
--------------------------------------	-------------------------------

**COURT CLERK:** Athena Trujillo

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- This Court having considered the Defendant s Motion to Dismiss Pursuant to NRCP 12(b)(5), and the arguments of counsel FINDS that because Defendants have not yet answered there is a properly filed Amended Complaint on file without leave of the Court which alleges that the individual Defendant Patin directed the alleged statement be published on the firm website. In light of the allegations in the Amended Complaint which this Court must accept as true, the Court ORDERS the Motion to Dismiss DENIED. This Court GRANTS the Motion to Dismiss as to the alter ego claim as Plaintiff s allegations on information and belief amount to a fishing expedition and potentially could result in abusive and harassing litigation tactics. Counsel for the Plaintiff is to prepare an order consistent with these minutes and the minutes for the hearing date on March 9, 2016.

CLERK S NOTE: A copy of this minute order has been e-mailed to Prescott Jones, Esq. and Christian Morris, Esq. -amt 3/21/16

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Other Tort

COURT MINUTES

March 30, 2016

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

March 30, 2016      3:00 AM      Motion For  
Reconsideration

HEARD BY: Togliatti, Jennifer

COURTROOM: No Location

COURT CLERK: Athena Trujillo

RECORDER:

REPORTER:

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- This Court, having considered the Defendants Motion for Reconsideration, all related pleadings and the record first FINDS that this matter is properly heard on the Court s chamber calendar without oral argument pursuant to EDCR 2.23. This Court previously found that the matter was not ripe for 12(b)(5) dismissal. Defendant s Motion for Reconsideration arguing that this Court s decision is erroneous does not persuade this Court the previous Motion should have been granted. The allegations in the First Amended Complaint filed 2/23/16, or the previously filed Complaint, if taken as true as this Court must do pursuant to the case law on Motions to Dismiss, could state a claim for which relief may be granted. All facts cited by Defendant, whether supported by affidavit, deposition or judicial notice of facts found in another case, require this Court to look outside of the Plaintiff s Complaint. Defendant refers to Exhibits including Exhibits A,B,C, D, H, I, J, K, L, M in support of reconsideration to address facts outside of the Plaintiff s Complaint, which is why this Court ruled that the issues raised by Defendant are not proper for a Motion to Dismiss or not properly considered in a Motion to Dismiss because the Defendants wish this Court to look outside of Plaintiff s Complaint and dismiss the case based upon facts presented or argued in the Motion to Dismiss. This Court again disagrees with the Defendants position that the Court should review or consider evidence outside, or contradicting, the Complaint and dismiss. Court ORDERS Motion for Reconsideration of Court s Denial of Defendant s Alternative 12(b)(5) Motion to Dismiss DENIED.

CLERK S NOTE: A copy of this minute order has been e-mailed to Prescott Jones, Esq. and Christian Morris, Esq. -amt 4/6/16



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort****COURT MINUTES****May 04, 2016**

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

**May 04, 2016      3:00 AM      Motion For Stay**

**HEARD BY:** Togliatti, Jennifer      **COURTROOM:** No Location

**COURT CLERK:** Athena Trujillo

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- This Court, having considered the Defendant's Motion for Stay and Plaintiff's Opposition GRANTS IN PART and DENIES IN PART Defendant's Motion. NRS 41.660 provides for the mandatory stay of discovery pending disposition of the appeal and therefore the Defendant's Motion to Stay is GRANTED as to discovery. When considering the factors for a stay of the entire litigation, in this Court's view none favor Defendants. First, the object of the appeal will not be defeated. Next, there is no irreparable injury because litigation expenses do not constitute irreparable harm. Here, if the Supreme Court agrees with Defendant's they would recover reasonable costs and attorney's fees from Plaintiff based upon NRS 41.670. Additionally, Plaintiff would face the possibility of up to \$10,000.00 in sanctions against Plaintiff, therefore, any financial impact on Defendant's would be rectified if Defendants are successful on appeal. Therefore, the Motion to Stay the Litigation in its entirety is DENIED IN PART and only discovery is stayed.

CLERK'S NOTE: A copy of this minute order has been e-mailed to Prescott Jones, Esq. and Christian Morris, Esq. -amt 5/4/16

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**May 11, 2016**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**May 11, 2016**

**3:00 AM**

**Motion**

**HEARD BY:** Togliatti, Jennifer

**COURTROOM:** No Location

**COURT CLERK:** Athena Trujillo

**RECORDER:**

**REPORTER:**

**PARTIES**

**PRESENT:**

**JOURNAL ENTRIES**

- This Court, having reviewed the pleadings, notes, the partial stay, and not withstanding Plaintiff's Opposition, there is nominal prejudice to the Plaintiff when considering the statutorily mandated stay of discovery. COURT ORDERS, Motion for Enlargement of Time GRANTED.

CLERK'S NOTE: A copy of this minute order has been e-mailed to Prescott Jones, Esq. and Christian Morris, Esq. -amt 5/11/16

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**June 29, 2016**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**June 29, 2016      9:00 AM      Motion to Dismiss**

**HEARD BY:** Bixler, James      **COURTROOM:** RJC Courtroom 10C

**COURT CLERK:** Athena Trujillo

**RECORDER:** Yvette G. Sison

**REPORTER:**

**PARTIES**

**PRESENT:**      Carlston, Jon J      Attorney  
Patin, Ingrid      Defendant

**JOURNAL ENTRIES**

- Court advised it was notified that Defense counsel would be requesting a continuance. Colloquy regarding continuance date. COURT ORDERED, matter CONTINUED.

CONTINUED TO: 7/20/16 9:00 AM

CLERK'S NOTE: A copy of this minute order has been e-mailed to Christian Morris, Esq. and Prescott Jones, Esq. -amt 6/29/16

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**July 20, 2016**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**July 20, 2016      9:00 AM      Motion to Dismiss**

**HEARD BY:** Togliatti, Jennifer      **COURTROOM:** RJC Courtroom 10C

**COURT CLERK:** Phyllis Irby

**RECORDER:** Yvette G. Sison

**REPORTER:**

**PARTIES**

**PRESENT:**      Jones, Prescott T.      Attorney  
                         Morris, Christian      Attorney

**JOURNAL ENTRIES**

- Mr. Morris informed the Court they now have a new Complaint. COURT ORDERED, it will issue a minute order next week on the Chambers calendar.

7-27-16 CHAMBERS CALENDAR (DEPT. IX)

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**July 27, 2016**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**July 27, 2016      3:00 AM      Motion to Dismiss**

**HEARD BY:** Togliatti, Jennifer      **COURTROOM:** No Location

**COURT CLERK:** Athena Trujillo

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- Court ORDERS counsel to appear August 10, 2016 at the 9:00 a.m. hearing calendar to further address the Court regarding Defendant s Renewed Special Motion to Dismiss Pursuant to Nevada Revised Statutes 41.635-70 and therefore ORDERS the Defendant s Motion continued to be heard on that date.

CONTINUED TO: 8/10/16 9:00 AM

CLERK'S NOTE: A copy of this Minute Order was placed in the attorney folder of:  
Prescott James, Esq. & Christian Morris, Esq. -se8/4/16

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**August 10, 2016**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**August 10, 2016      9:00 AM      Motion to Dismiss**

**HEARD BY:** Togliatti, Jennifer      **COURTROOM:** RJC Courtroom 10C

**COURT CLERK:** Phyllis Irby

**RECORDER:** Yvette G. Sison

**REPORTER:**

**PARTIES**

**PRESENT:** Jones, Prescott T.      Attorney  
Wynder, Edward J.      Attorney

**JOURNAL ENTRIES**

- The Court noted it is aware of a case that counsel needs to do research on Jacobs vs. Sands A627691. There are Orders in that case that was filed on 11/16/15 with a footnote by Judge Gonzalez where she references decisions being applicable to a subsequent Amended Complaint. The Court believes it was done in this case because the Supreme Court and this very issue that Pltf's counsel would suggest is an abusive litigation is exactly what happened in the Jacob vs. Sands case that Judge Gonzales makes reference to in her footnote.

COURT ORDERED, MOTION DENIED as it relates to the Amended Complaint. The previous STAY of the Discovery in the case is in force and effect as it relates to the Amended Complaint. Mr. Jones to prepare an Order consistent with the previous Order.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort****COURT MINUTES****March 14, 2017**

A-15-723134-C      Ton Lee, Plaintiff(s)  
                                  vs.  
                                  Ingrid Patin, Defendant(s)

**March 14, 2017      3:00 AM      Minute Order**

**HEARD BY:** Togliatti, Jennifer      **COURTROOM:** No Location

**COURT CLERK:** Athena Trujillo

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- The Court became aware of the substitution of counsel for Defendant Patin Law Group after beginning review of the Motion for Summary Judgment briefs today, as there have been no motions before Court since the substitution was filed, until the instant Motion for Summary Judgment. As a result of a conflict, tomorrow s hearing is being vacated because this Court must recuse to avoid the appearance of impropriety and implied bias. This is due to a close personal friendship with attorney J. Thompson and his spouse, as well as Paul Larsen and his spouse. In light of this Court s prolonged, recent, and regular social contact with attorneys for Patin Law Group, including but not limited to performing their wedding ceremonies and regular social contact, the Court RECUSES and ORDERS the matter randomly reassigned.

CLERK S NOTE: A copy of this minute order has been e-mailed to Prescott Jones, Esq. and Paul Larsen, Esq. -amt 3/14/17

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort****COURT MINUTES****May 09, 2017**

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

**May 09, 2017      9:30 AM      All Pending Motions**

**HEARD BY:** Sturman, Gloria      **COURTROOM:** RJC Courtroom 10D

**COURT CLERK:** Tena Jolley

**RECORDER:** Kerry Esparza

**REPORTER:**

**PARTIES**

**PRESENT:**      Jones, Prescott T.      Attorney  
Larsen, Paul Edward      Attorney  
Morris, Christian      Attorney

**JOURNAL ENTRIES**

- Ms. Morris indicated that the appeal had been decided by the Supreme Court; the trial jury verdict had been reinstated and has now been paid. That we are here regarding the posting that was made on the website; that there is currently an appeal pending on the issue of anti-slap; and argued that now that the verdict has been reinstated, the statement was true that there was in fact a verdict in that amount does not state that the verdict was against Ton Vinh Lee, just that he was sued. Court reiterated what the posting stated and indicated it implies a judgment was received against all defendants. Ms. Morris argued it is a question of law if the statement was false and defamatory. Mr. Jones argued the statement to be false; that no discovery has been conducted to date; and the motion is premature. Court questioned whether it was a question for the jury or if more discovery would be necessary. Mr. Jones believes more discovery was needed. Ms. Morris further argued that everything in the statement was absolutely true; that it is plaintiff's burden to show a genuine issue of material fact exists and argued that it is a question of law if there was a defamatory statement. COURT ORDERED, Motion DENIED WITHOUT PREJUDICE as premature as there is a partial stay in place and the Court cannot say as a matter of law that the statement is or is not defamatory. Ms. Morris to prepare the Order.



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort****COURT MINUTES****July 11, 2017**

A-15-723134-C

Ton Lee, Plaintiff(s)

vs.

Ingrid Patin, Defendant(s)

**July 11, 2017****9:30 AM****All Pending Motions**

**Ingrid Patin's Patin's  
Motion for Summary  
Judgment... Patin  
Law Group PLLC's  
Joinder to Motion for  
Summary  
Judgment...Pltf Lee's  
Opp and  
Countermotion to  
Stay Litigation**

**HEARD BY:** Sturman, Gloria**COURTROOM:** RJC Courtroom 10D**COURT CLERK:** Sharon Chun**RECORDER:** Kerry Esparza**REPORTER:****PARTIES****PRESENT:**

Jones, Prescott T.

Attorney

Morris, Christian

Attorney

**JOURNAL ENTRIES**

- Ingrid Patin's Motion for Summary Judgment... Patin Law Group PLLC's Joinder to Motion for Summary Judgment...Pltf Lee's Opp and Countermotion to Stay Litigation

Following arguments by counsels, COURT ORDERED, Ingrid Patin's Motion for Summary Judgment and all Joinders, DENIED WITHOUT PREJUDICE.

COURT FURTHER ORDERED, Pltf's Countermotion to Stay Litigation and for finding of vexatious litigant, DENIED WITHOUT PREJUDICE.



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**July 31, 2017**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**July 31, 2017      10:00 AM      Motion For Stay**

**HEARD BY:** Sturman, Gloria      **COURTROOM:** RJC Courtroom 10D

**COURT CLERK:** Keri Cromer

**RECORDER:** Kerry Esparza

**REPORTER:**

**PARTIES**

**PRESENT:** Jones, Prescott T.      Attorney

**JOURNAL ENTRIES**

- Mr. Jones advised he had not heard anything from opposing counsel and he didn't see any opposition. COURT ORDERED, Motion GRANTED; temporary 90-day stay in place; matter SET for status check. Mr. Jones to prepare the Order.

10/31/2017 - 9:00 AM - STATUS CHECK: STAY

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**October 31, 2017**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**October 31, 2017      9:00 AM      Status Check**

**HEARD BY:** Sturman, Gloria      **COURTROOM:** RJC Courtroom 10D

**COURT CLERK:** Lorna Shell

**RECORDER:** Kerry Esparza

**REPORTER:**

**PARTIES**

**PRESENT:** Wynder, Edward J.      Attorney

**JOURNAL ENTRIES**

- Mr. Winder stated the appeal was due on November 2, 2017. Upon inquiry by the Court regarding whether the matter was fully briefed, Mr. Winder requested 90 days. COURT ORDERED, Status Check: Stay CONTINUED; Stay EXTENDED to 01/30/18.

01/30/18 9:00 AM STATUS CHECK: STAY

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**January 25, 2018**

---

A-15-723134-C	Ton Lee, Plaintiff(s) vs. Ingrid Patin, Defendant(s)
---------------	--

---

<b>January 25, 2018</b>	<b>10:00 AM</b>	<b>Status Check</b>
-------------------------	-----------------	---------------------

**HEARD BY:** Sturman, Gloria

**COURTROOM:** RJC Courtroom 10D

**COURT CLERK:** Lorna Shell

**RECORDER:** Kerry Esparza

**REPORTER:**

**PARTIES**

**PRESENT:**

**JOURNAL ENTRIES**

- COURT FINDS at the October 31, 2017 hearing counsel indicated their appeal was due November 2, 2017 and the Status Check was extended to January 30, 2018. COURT ORDERED, Counsel to forward to the Court a WRITTEN UPDATE of the appeal status and advise when the next status check is requested, otherwise the Status Check shall be continued to May 1, 2018; Status Check currently set for January 30, 2018 VACATED.

CLERK'S NOTE: A copy of this minute order was faxed or placed in the attorney folder(s) of: Prescott Jones, Esq. (702-997-3800 Resnic & Lewis), Paul Larsen, Esq. (702-784-5252 Snell & Wilmer), and Brian Nettles, Esq. (702-434-1488 Nettles Law Firm)./ ls 1-25-18

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**May 01, 2018**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**May 01, 2018      9:00 AM      Status Check**

**HEARD BY:** Sturman, Gloria      **COURTROOM:** RJC Courtroom 03A

**COURT CLERK:** Madalyn Kearney

**RECORDER:** Patti Slattery

**REPORTER:**

**PARTIES**

**PRESENT:** Jones, Prescott T.      Attorney  
Wynder, Edward J.      Attorney

**JOURNAL ENTRIES**

- Upon Court's inquiry, counsel agreed to continue the matter six months. COURT ORDERED, matter CONTINUED.

CONTINUED TO: 10/30/18 9:00 AM

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**October 30, 2018**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**October 30, 2018      9:00 AM      Status Check**

**HEARD BY:** Sturman, Gloria      **COURTROOM:** RJC Courtroom 10D

**COURT CLERK:** Lorna Shell

**RECORDER:** Kerry Esparza

**REPORTER:**

**PARTIES**

**PRESENT:**      Jones, Prescott T.      Attorney  
Wynder, Edward J.      Attorney

**JOURNAL ENTRIES**

- Mr. Jones stated the appeal was heard on July 9, 2018 and they were just waiting on the decision.  
COURT ORDERED, Status Check: Stay CONTINUED.

CONTINUED TO: 01/29/18 9:00 AM

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**January 08, 2019**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**January 08, 2019      9:00 AM      Status Check**

**HEARD BY:** Sturman, Gloria      **COURTROOM:** RJC Courtroom 10D

**COURT CLERK:** Lorna Shell

**RECORDER:** Kerry Esparza

**REPORTER:**

**PARTIES**

**PRESENT:** Jones, Prescott T.      Attorney  
Morris, Christian      Attorney

**JOURNAL ENTRIES**

- Court noted the case had been stayed for a year and indicated the case would be coming up on the five-year rule.

Ms. Morris stated the only thing they'd done during the stay was file an answer.

Court inquired if the parties wished to proceed in the ordinary course.

Mr. Jones stated the ADR Commissioner had requested information from the parties during the stay.

COURT ORDERED, Stay LIFTED; Parties REFERRED to ADR; Parties REFERRED to Discovery Commissioner; Counsel to calculate how long the case was stayed and determine when the five year rule runs.



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Other Tort

COURT MINUTES

June 18, 2019

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

**June 18, 2019      9:30 AM      Objection to the  
Arbitration  
Commissioner's Report**

HEARD BY: Sturman, Gloria

COURTROOM: RJC Courtroom 10D

COURT CLERK: Lorna Shell

RECORDER: Kerry Esparza

REPORTER:

**PARTIES**

<b>PRESENT:</b>	Allen, Victoria R.	Attorney
	Jones, Prescott T.	Attorney
	Morris, Christian	Attorney

**JOURNAL ENTRIES**

- Ms. Morris argued their request for exemption was after the deadline and as such prejudicial, that their request for exemption stated lost revenue of \$50,000 with no evidence, that this was a sole practitioner's web site with no evidence of anyone looking at the post, and that they must show intent and evidence of damages. Ms. Morris argued Pltf.'s allege a loss of over \$1 million for a posting the Deft. never received any referrals from and that Pltf.'s argued this was public policy; however when Deft.'s argued public policy they argued it wasn't. Ms. Morris argued there was no evidence anyone read the post and that the prejudice to Deft. was great.

Mr. Jones argued discovery hadn't even opened due to the appeal, there was no prejudice, that in this type of case it was difficult to quantify and even more difficult to prove. Mr. Jones further argued the case the Deft.'s cite was worth well over \$50,000 in current dollars and that his client was seeking to sell a portion of his practice and the first thing that comes up when you google search him is this post. Mr. Jones argued good cause existed, there were substantial damages claimed, and there was good cause to waive timelines due to the issues raised.

Ms. Morris argued the Pltf. did not state any good cause, there was extreme delay, and the only way to proceed would be to keep the case in the arbitration program.

COURT STATED FINDINGS AND ORDERED, Objection DENIED; counsel to proceed with the litigation in a timely manner.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**August 20, 2019**

---

A-15-723134-C	Ton Lee, Plaintiff(s)
	vs.
	Ingrid Patin, Defendant(s)

---

**August 20, 2019      9:30 AM      Motion to Dismiss**

**HEARD BY:** Sturman, Gloria      **COURTROOM:** RJC Courtroom 10D

**COURT CLERK:** Lorna Shell

**RECORDER:** Kerry Esparza

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Jones, Prescott T.	Attorney
	Morris, Christian	Attorney

**JOURNAL ENTRIES**

- Mr. Morris argued regarding the Moon case, that if the case was never accepted in the arbitration program then there was no tolling, that they were prevented from noticing, and that they had to ask for a continuance and show compelling or extra ordinary circumstances. Mr. Morris advised regarding how the case proceeded and further argued regarding the tolling time frames. Mr. Morris argued nothing prevented Deft.'s from noticing and scheduling the Early Case Conference (ECC).

Mr. Jones argued there was a stay prior to the first answer by Deft.'s and his client couldn't have filed the ECC, that the Moon case was never raised in the initial motion, and if the Court was going to rely on it he would request an opportunity to brief it. Mr. Jones further argued the 180 days ran on July 7, that he attempted to contact Deft. on July 10 but was told he was unavailable, and that he hadn't heard from Deft. until he filed his motion on Monday. Mr. Jones argued he set the ECC and Deft. did not appear.

Following further arguments regarding the time frame to file the ECC, COURT ORDERED, Motion DENIED as the Court does not think a party gets additional time; however there was the argument that they didn't have to schedule anything during the time period, that they were entitled to claim additional time which was good cause; Pltf. to prepare the order.



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**September 06, 2019**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**September 06, 2019      3:00 AM      Status Check**

**HEARD BY:** Sturman, Gloria

**COURTROOM:** RJC Courtroom 10D

**COURT CLERK:** Lorna Shell

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- COURT FINDS a Status Check on the Chambers Calendar Re: Joint Case Conference Report, with the order on August 20, 2019 hearing having been submitted, COURT THEREFORE ORDERED, Status Check CONTINUED.

CONTINUED TO: 09/20/19 Chambers Calendar

CLERK'S NOTE: A copy of this minute order has been electronically served to all registered parties for Odyssey File & Serve./ls 09-06-19

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**September 20, 2019**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**September 20, 2019      3:00 AM      Status Check**

**HEARD BY:** Sturman, Gloria

**COURTROOM:** RJC Courtroom 10D

**COURT CLERK:** Lorna Shell

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- COURT FINDS the Joint Case Conference Report to be filed and a meeting held on September 13, 2019. COURT ORDERED, Status Check CONTINUED 30 days to allow counsel the necessary time to file.

CONTINUED TO: 10/18/19 Chambers Calendar.

CLERK'S NOTE: Minutes CORRECTED to reflect the JCCR was to be filed. A copy of this minute order has been electronically served to all registered parties for Odyssey File & Serve./ls 09-20-19

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**November 13, 2019**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**November 13, 2019      10:30 AM      Mandatory Rule 16  
Conference**

**HEARD BY:** Sturman, Gloria

**COURTROOM:** RJC Courtroom 10D

**COURT CLERK:** Lorna Shell

**RECORDER:** Kerry Esparza

**REPORTER:**

**PARTIES**

**PRESENT:**      Doyle, Kerry J.      Attorney  
                 Jones, Prescott T.      Attorney  
                 Morris, Christian      Attorney

**JOURNAL ENTRIES**

- Following colloquy, COURT ORDERED, Trial Dates Set.

01/28/21 9:00 AM CALENDAR CALL

02/16/21 9:00 AM BENCH TRIAL

Ms. Doyle stated the damages claim was for \$10 million and as of this date she had not received a computation of damages, that the case had been going on since 2015, and that as of this date she'd not received any information regarding losses.

Mr. Jones stated disclosures were filed two months ago and that this was a discovery issue and better handled by the Discovery Commissioner. Mr. Jones stated a 2.67 hearing may be needed.

Court stated the Deft.'s were entitled to know if this was personal or public and that they needed to know if they can stick to this timeline.

Mr. Jones stated his client's damages were personal, that he was working to get the documents diligently, that this was defamation per se, and that it was regarding diminution of value of a business. Mr. Jones stated he planned to supplement discovery by December and that he thought discovery could be completed in nine months.

Court stated that would be a six week delay and the documents would require a great deal of analysis and that the Deft.'s were entitled to discovery; however she thought discovery could be completed in nine months.

COURT ORDERED, Case REFERRED to the Discovery Commissioner regarding a dispute resolution conference.



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Other Tort

COURT MINUTES

March 03, 2020

A-15-723134-C

Ton Lee, Plaintiff(s)

vs.

Ingrid Patin, Defendant(s)

March 03, 2020

10:00 AM

Motion to Compel

**Defendant Ingrid  
Patin's Motion to  
Compel Plaintiff's  
Computation of  
Damages**

HEARD BY: Truman, Erin

COURTROOM: RJC Level 5 Hearing Room

COURT CLERK: Jennifer Lott

RECORDER: Francesca Haak

REPORTER:

**PARTIES****PRESENT:**

Jones, Prescott T.

Attorney

Morris, Christian

Attorney

**JOURNAL ENTRIES**

- Arguments by counsel. Mr. Jones addressed the potential business disparagement claim; the potential sale that did not go forward, but the sale was less than what it would have been due to the defamatory statement. COMMISSIONER RECOMMENDED, motion is GRANTED IN PART and DENIED IN PART; any calculation Plaintiff has at this point must be disclosed when it is available, or at expert disclosure; supplement the calculation of damages, and the amount will be supplemented; if Plaintiff is claiming a decline in business, any economic damages that can be identified must be supplemented; expert disclosures may change that amount; disclose information within 30 days from today. Ms. Morris to prepare the Report and Recommendations, and Mr. Jones to approve as to form and content. A proper report must be timely submitted within 14 days of the hearing. Otherwise, counsel will pay a contribution.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Other Tort

COURT MINUTES

August 04, 2020

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

**August 04, 2020      9:00 AM      Motion to Extend  
Discovery**

HEARD BY: Sturman, Gloria

COURTROOM: RJC Courtroom 10D

COURT CLERK: Natalie Ortega

RECORDER: Kerry Esparza

REPORTER:

**PARTIES**

<b>PRESENT:</b>	Doyle, Kerry J.	Attorney
	Jones, Prescott T.	Attorney
	Morris, Christian	Attorney

**JOURNAL ENTRIES**

- Arguments by counsel regarding Plaintiff's Motion to Extend Discovery Deadline - First Request. COURT stated FINDINGS and ORDERED, motion GRANTED under 17 and 18 of the Administrative Order to allow additional time for discovery, additional time for expert and rebuttal disclosures,. Further, however much time was necessary to depose the Plaintiff. COURT NOTED the motion was GRANTED WITHOUT PREJUDICE to the Defendant to move to exclude the information. As the information appeared to predate Co-Vid. Additionally, the Court was not prepared to exclude the expert at this point. Court expressed concern that the Plaintiff did not produce relevant information to the Defendant at an earlier point in time. Party allowed to produce the expert witness report, allowed an additional sixty days to file an opposition to the report, and allow deposition of the Plaintiff, not limited by any number of hours as necessary. COURT FURTHER NOTED all was without prejudice to the Defendant to raise issues with why this information was not disclosed sooner. Mr. Jones advised based on opposing parties request the expert's name was Christopher Money. Court noted the expert's name should be included in the Order. COURT DIRECTED Mr. Jones to prepare the Order and the expert should be disclosed / identified.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**August 25, 2020**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**August 25, 2020      3:00 AM      Minute Order**

**HEARD BY:** Sturman, Gloria      **COURTROOM:** Chambers

**COURT CLERK:** Natalie Ortega

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- There being no response filed and the filing of a Notice of Withdraw of the Motion to Strike Defendant Ingrid Patin s Supplemental Opposition to Plaintiff s Motion to Extend Discovery Deadlines and Request for Sanctions, as well as request to vacate the hearing, COURT ORDERED, the September 8, 2020 Plaintiff Ton Vinh Lee's Motion to Strike Defendant Ingrid Patin's Supplemental Opposition to Plaintiff's Motion to Extend Discovery Deadlines and Request for Sanctions VACATED as MOOT.

CLERK'S NOTE: This minute order was electronically served by Courtroom Clerk, Natalie Ortega, to all registered parties for Odyssey File & Serve and/or served via facsimile. ndo/08/25/20

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**September 15, 2020**

---

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

---

**September 15, 2020    9:30 AM      All Pending Motions**

**HEARD BY:** Sturman, Gloria      **COURTROOM:** RJC Courtroom 10D

**COURT CLERK:** Kathryn Hansen-McDowell

**RECORDER:** Kerry Esparza

**REPORTER:**

**PARTIES**

**PRESENT:**      Doyle, Kerry J.      Attorney  
                 Jones, Prescott T.      Attorney  
                 Morris, Christian      Attorney

**JOURNAL ENTRIES**

- DEFENDANT INGRID PATIN'S MOTION FOR JUDGMENT ON THE PLEADINGS, IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT . . . DEFENDANT PATIN LAW GROUP, PLLC'S JOINDER TO DEFENDANT INGRID PATIN'S MOTION FOR JUDGMENT ON THE PLEADINGS, IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT . . . DEFENDANT PATIN LAW GROUP, PLLC'S JOINDER TO DEFENDANT INGRID PATIN'S MOTION FOR JUDGMENT ON THE PLEADINGS, IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT.

Arguments by counsel. Colloquy regarding discovery that has not been completed. Court inquired if there was any evidence to go on. Further arguments by counsel. COURT stated its FINDINGS and ORDERED Summary Judgment GRANTED as to Ms. Patin. Ms. Morris to prepare the order.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort****COURT MINUTES****January 06, 2021**

A-15-723134-C      Ton Lee, Plaintiff(s)  
vs.  
Ingrid Patin, Defendant(s)

**January 06, 2021      9:30 AM      All Pending Motions**

**HEARD BY:** Becker, Nancy      **COURTROOM:** RJC Courtroom 10D

**COURT CLERK:** Kristen Brown

**RECORDER:** Kerry Esparza

**REPORTER:**

**PARTIES**

**PRESENT:**      Doyle, Kerry J.      Attorney  
                         Jones, Prescott T.      Attorney  
                         Morris, Christian      Attorney

**JOURNAL ENTRIES**

- PLTF. TON VINH LEE S MOTION TO ALTER OR AMEND JUDGMENT PURSUANT TO NRCP 59(e)...DEFT. PATIN LAW GROUP, PLLC'S JOINDER TO DEFT. INGRID PATIN'S OPPOSITION TO PLTF'S MOTION TO ALTER OR AMEND JUDGMENT PURSUANT TO NRCP 59(e): Court stated there is no such thing as an alter or amend judgment in this context, therefore, ORDERED, Motion DENIED.

PLTF. TON VINH LEE'S MOTION FOR RECONSIDERATION OF THE COURT'S ORDER GRANTING DEFT. INGRID PATIN'S MOTION FOR SUMMARY JUDGMENT...DEFT. PATIN LAW GROUP, PLLC'S JOINDER TO DEFT. INGRID PATIN'S OPPOSITION TO PLTF'S MOTION FOR RECONSIDERATION OF THE COURT'S ORDER GRANTING DEFT'S MOTION FOR SUMMARY JUDGMENT...DEFT. PATIN LAW GROUP, PLLC'S MOTION FOR ATTORNEYS' FEES AND INTEREST...DEFT. INGRID PATIN'S MOTION FOR ATTORNEYS' FEES, COSTS AND INTEREST: Court stated there has been a request from Ms. Morris to continue these matters as it was Judge Sterman who made the decisions and is most familiar with the case. Court stated it is prepared to rule on the motions, however, would like to hear from counsel regarding the request to continue. Counsel stated that based on the history Judge Sterman has with this case, request it be continued for

Judge Sturman to hear these matters. COURT ORDERED, Motions CONTINUED.

2/09/21 9:30 AM PLTF. TON VINH LEE'S MOTION FOR RECONSIDERATION OF THE COURT'S ORDER GRANTING DEFT.

INGRID PATIN'S MOTION FOR SUMMARY JUDGMENT...DEFT. PATIN LAW GROUP, PLLC'S JOINDER TO DEFT.

INGRID PATIN'S OPPOSITION TO PLTF'S MOTION FOR RECONSIDERATION OF THE COURT'S ORDER GRANTING

DEFT'S MOTION FOR SUMMARY JUDGMENT...DEFT. PATIN LAW GROUP, PLLC'S MOTION FOR ATTORNEYS'

FEES AND INTEREST...DEFT. INGRID PATIN'S MOTION FOR ATTORNEYS' FEES, COSTS AND INTEREST

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Tort**

**COURT MINUTES**

**February 09, 2021**

---

A-15-723134-C	Ton Lee, Plaintiff(s) vs. Ingrid Patin, Defendant(s)
---------------	--

---

**February 09, 2021      9:30 AM      All Pending Motions**

**HEARD BY:** Sturman, Gloria      **COURTROOM:** RJC Courtroom 10D

**COURT CLERK:** Louisa Garcia

**RECORDER:** Kerry Esparza

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Doyle, Kerry J. Jones, Prescott T. Morris, Christian	Attorney Attorney Attorney
-----------------	--	----------------------------------

**JOURNAL ENTRIES**

- PLAINTIFF TON VINH LEE'S MOTION FOR RECONSIDERATION OF THE COURT'S ORDER GRANTING DEFENDANT INGRID PATIN'S MOTION FOR SUMMARY JUDGMENT ..DEFENDANT PATIN LAW GROUP, PLLC'S JOINDER TO DEFENDANT INGRID PATIN'S OPPOSITION TO PLAINTIFF'S MOTION FOR RECONSIDERATION OF THE COURT'S ORDER GRANTING DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT... DEFENDANT INGRID PATIN'S MOTION FOR ATTORNEYS' FEES, AND COSTS, AND INTEREST.... DEFENDANT PATIN LAW GROUP, PLLC's MOTION FOR ATTORNEYS' FEES AND INTEREST

Mr. Jones argued in support of Motion for Reconsideration and stated the order for argument was already made and decided by the predecessor Court. Ms. Morris argued in opposition as there was no new information and Plaintiff has not met any of the prongs for reconsideration. Mr. Doyle had no additional issues to raise. Further argument. Court advised it seems like at this point where we have further discovery, it was a different time in the case and different information upon which to base the summary judgment and it was granted on that basis. Subsequently, the case evolved over this period of time. COURT ORDERED, Motion for Reconsideration DENIED.

Arguments by counsel regarding Motions for Attorney's Fees. Mr. Kerry stated the arguments were the same; the only difference is the amount of fees and costs. Court believes there were valid offers of judgment; however, they has to do the Beattie analysis and it wants to look at the Rose Miller case and billing statements, noting the costs appeared to be reasonable. COURT ORDERED, Motions for Attorney's Fees CONTINUED to chambers for decision, noting it had a question whether there should be attorney's fees under those offers, and if it was reasonable and how much. Mr. Jones to prepare Order, approved as to form and content by opposing counsel.

CONTINUED TO 3/26/21 (CHAMBERS) DEFENDANT INGRID PATIN'S MOTION FOR ATTORNEYS' FEES, AND COSTS, AND INTEREST....DEFENDANT PATIN LAW GROUP, PLLC's MOTION FOR ATTORNEYS' FEES AND INTEREST





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

**PRESCOTT JONES**  
**8925 W. RUSSELL RD., SUITE 220**  
**LAS VEGAS, NV 89148**

**DATE: February 22, 2021**  
**CASE: A-15-723134-C**

**RE CASE:** TON VINH LEE vs. INGRID PATIN; PATIN LAW GROUP, PLLC

NOTICE OF APPEAL FILED: February 18, 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

---

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

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

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

---

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

# Certification of Copy

State of Nevada }  
County of Clark } SS:

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

NOTICE OF APPEAL; CASE APPEAL STATEMENT; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET; ORDER GRANTING DEFENDANT PATIN'S MOTION FOR SUMMARY JUDGMENT AND PATIN LAW GROUP'S JOINDER; NOTICE OF ENTRY OF ORDER GRANTING DEFENDANT PATIN'S MOTION FOR SUMMARY JUDGMENT AND PATIN LAW GROUP'S JOINDER; ORDER DENYING PLAINTIFF'S MOTION TO ALTER/AMEND JUDGMENT AND ORDER CONTINUING PLAINTIFF'S MOTION FOR RECONSIDERATION, DEFENDANT INGRID PATIN'S MOTIONS FOR FEES, COSTS, AND INTEREST AND DEFENDANT PATIN LAW GROUP, PLLC'S MOTION FOR ATTORNEYS FEES AND INTEREST; NOTICE OF ENTRY OF ORDER; DISTRICT COURT MINUTES; NOTICE OF DEFICIENCY

TON VINH LEE,

Plaintiff(s),

vs.

INGRID PATIN; PATIN LAW GROUP, PLLC,

Defendant(s),

Case No: A-15-723134-C

Dept No: XXVI

now on file and of record in this office.

**IN WITNESS THEREOF**, I have hereunto  
Set my hand and Affixed the seal of the  
Court at my office, Las Vegas, Nevada  
This 22 day of February 2021.

Steven D. Grierson, Clerk of the Court



Heather Ungermann, Deputy Clerk