

Electronically Filed  
Mar 31 2021 09:23 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**NOAS**  
**BRIAN C. WHITAKER**  
Nevada Bar No. 2329  
Email: bwhitaker@ericksonwhitaker.com  
**ERICKSON & WHITAKER PC**  
1349 Galleria Drive, Suite 200  
Henderson NV 89014  
Telephone: 702-433-9696  
Facsimile: 702-434-0615  
*Attorneys for Plaintiff/Counterdefendant*  
**Brad L. Knowlton**

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

BRAD L. KNOWLTON, an individual,  
  
Plaintiff,

v.

VALLEY ASCENT, LLC, a Nevada limited liability company, WILLIAM L. LINDNER, as Trustee of the William L. Lindner and Maxine G. Lindner Trust of 1988, JUEL A. PARKER, as Trustee of the Juel A. Parker Family Trust, LISA PARKER, as Trustee of the Juel A. Parker Family Trust, LISA PARKER, an individual, and S. BRUCE PARKER, as Trustee of the Steven Bruce Parker Family Trust,

Defendants.

WILLIAM L. LINDNER, as Trustee of the William L. Lindner and Maxine G. Lindner Trust of 1988, individually and derivatively; LISA PARKER, as Trustee of the Juel A. Parker Family Trust, individually and derivatively; S. BRUCE PARKER, as Trustee of the Steven Bruce Parker Family Trust, individually and derivatively; and JUEL PARKER, individually,

Counterclaimants,

v.

BRAD L. KNOWLTON, individually and derivatively; and DOE Individuals I – X and ROE Entities I – X, inclusive,

Counterdefendants


and

Nominal party VALLEY ASCENT, LLC, a Nevada limited liability company.

**CASE NO. A-20-809612-B**  
**DEPT. NO. XI**

**NOTICE OF APPEAL**



BY   
 BRIAN C. WHITAKER, ESQ.  
 Nevada Bar No. 2329  
 1349 Galleria Drive, Suite 200  
 Henderson, NV 89014  
 Attorney for Plaintiff/Counterdefendant  
 Brad L. Knowlton

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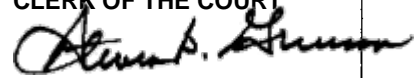
**CERTIFICATE OF SERVICE**

I certify that I am an employee of Erickson & Whitaker PC, and that on the 25<sup>th</sup> day of March, 2021 I submitted the within NOTICE OF APPEAL to Odyssey eFileNV for filing and service through the District Court's electronic filing system to the following counsel of record:

Mark E. Ferrario; ferrariom@gtlaw.com  
Kara B. Hendricks; hendricksk@gtlaw.com  
Alayne M. Opie; opiea@gtlaw.com  
Attorneys for Defendants/Counterclaimants

  
Employee of Erickson & Whitaker PC





1 **ASTA**  
2 **BRIAN C. WHITAKER**  
3 Nevada Bar No. 2329  
4 Email: bwhitaker@ericksonwhitaker.com  
5 **ERICKSON & WHITAKER PC**  
6 1349 Galleria Drive, Suite 200  
7 Henderson NV 89014  
8 Telephone: 702-433-9696  
9 Facsimile: 702-434-0615  
10 *Attorneys for Plaintiff/Counterdefendant*  
11 *Brad L. Knowlton*

7 **DISTRICT COURT**  
8 **CLARK COUNTY, NEVADA**

9 BRAD L. KNOWLTON, an individual,  
10  
11 Plaintiff,

**CASE NO. A-20-809612-B**  
**DEPT. NO. XI**

12 v.

**CASE APPEAL STATEMENT**

13 VALLEY ASCENT, LLC, a Nevada limited liability  
14 company, WILLIAM L. LINDNER, as Trustee of  
15 the William L. Lindner and Maxine G. Lindner Trust  
16 of 1988, JUEL A. PARKER, as Trustee of the Juel  
17 A. Parker Family Trust, LISA PARKER, as Trustee  
18 of the Juel A. Parker Family Trust, LISA PARKER,  
19 an individual, and S. BRUCE PARKER, as Trustee  
20 of the Steven Bruce Parker Family Trust,

21 Defendants.

22 WILLIAM L. LINDNER, as Trustee of the William  
23 L. Lindner and Maxine G. Lindner Trust of 1988,  
24 individually and derivatively; LISA PARKER, as  
25 Trustee of the Juel A. Parker Family Trust,  
26 individually and derivatively; S. BRUCE PARKER,  
27 as Trustee of the Steven Bruce Parker Family Trust,  
28 individually and derivatively; and JUEL PARKER,  
individually,

Counterclaimants,

v.

BRAD L. KNOWLTON, individually and  
derivatively; and DOE Individuals I – X and ROE  
Entities I – X, inclusive,

Counterdefendants

and

Nominal party VALLEY ASCENT, LLC, a Nevada  
limited liability company.

**CASE APPEAL STATEMENT**

Pursuant to NRAP 3(f), Plaintiff/Counterdefendant, BRAD L. KNOWLTON, by and through his attorney, Brian C. Whitaker, Esq., of the law firm of Erickson & Whitaker PC, hereby files this Case Appeal Statement.

DATED this 25<sup>th</sup> day of March, 2021.

ERICKSON & WHITAKER PC

BY

  
BRIAN C. WHITAKER, ESQ.

Nevada Bar No. 2329

1349 Galleria Drive, Suite 200

Henderson, NV 89014

*Attorney for Plaintiff/Counterdefendant*

*Brad L. Knowlton*

**1. NAME OF APPELLANT FILING THIS CASE APPEAL STATEMENT:**

Brad L. Knowlton

**2. IDENTIFY THE JUDGE ISSUING THE DECISION, JUDGMENT, OR ORDER APPEALED FROM:**

Elizabeth Gonzalez

**3. IDENTIFY EACH APPELLANT AND THE NAME AND ADDRESS OF COUNSEL FOR EACH APPELLANT:**

Appellant: Brad L. Knowlton

Counsel for Appellant: Brian C. Whitaker, Esq.  
ERICKSON & WHITAKER PC  
1349 Galleria Drive, Suite 200  
Henderson, Nevada 89014

**4. IDENTIFY EACH RESPONDENT AND THE NAME AND ADDRESS OF APPELLATE COUNSEL, IF KNOWN, FOR EACH RESPONDENT:**

Respondent: William L. Lindner, as Trustee of the William L. Lindner and Maxine G. Lindner Trust of 1988

Respondent: Juel A. Parker, individually and as Trustee of the Juel A. Parker Family Trust

Respondent: Lisa Parker, individually and as Trustee of the Juel A. Parker Family Trust





Respondent: S. Bruce Parker, as Trustee of the Steven Bruce Parker Family Trust

Counsel for Respondents: The name of Respondents' appellate counsel is unknown. The name and address of Respondents' trial counsel is as follows:

Mark E. Ferrario, Esq.  
Kara B. Hendricks, Esq.  
Alayne M. Opie, Esq.  
GREENBERG TRAURIG, LLP  
10845 Griffith Peak Drive, Suite 600  
Las Vegas, Nevada 89144

**5. INDICATE WHETHER ANY ATTORNEY IDENTIFIED ABOVE IN RESPONSE TO QUESTION 3 OR 4 IS NOT LICENSED TO PRACTICE LAW IN NEVADA AND, IF SO, WHETHER THE DISTRICT COURT GRANTED THAT ATTORNEY PERMISSION TO APPEAR UNDER SCR 42:**

All attorneys listed in response to question three (3) and question four (4) are licensed to practice law in the State of Nevada.

**6. INDICATE WHETHER APPELLANT WAS REPRESENTED BY APPOINTED OR RETAINED COUNSEL IN THE DISTRICT COURT:**

Appellant was represented by retained counsel in the District Court.

**7. INDICATE WHETHER APPELLANT IS REPRESENTED BY APPOINTED OR RETAINED COUNSEL ON APPEAL:**

Appellant is represented by retained counsel on appeal.

**8. INDICATE WHETHER APPELLANT WAS GRANTED LEAVE TO PROCEED IN FORMA PAUPERIS, AND THE DATE OF ENTRY OF THE DISTRICT COURT ORDER GRANTING SUCH LEAVE:**

Appellant was not granted leave to proceed in *forma pauperis*.

**9. INDICATE THE DATE THE PROCEEDINGS COMMENCED IN THE DISTRICT COURT:**

A Complaint in this matter was filed in Business Court on January 31, 2020.

**10. PROVIDE A BRIEF DESCRIPTION OF THE NATURE OF THE ACTION AND RESULT IN THE DISTRICT COURT, INCLUDING THE TYPE OF JUDGMENT OR ORDER BEING APPEALED AND THE RELIEF GRANTED BY THE DISTRICT COURT:**

Appellant, Brad L. Knowlton, commenced this lawsuit in District Court on January 31, 2020



1 after Respondents unlawfully removed Appellant as manager of Valley Ascent, LLC, a Nevada limited  
2 liability company. Appellant alleged breach of contract, breach of the implied covenant of good faith  
3 and fair dealing, declaratory relief, intentional interference with contractual relations, expulsion as a  
4 member, breach of fiduciary duty, receivership, and preliminary injunction.

5 Respondents filed an Answer and Counterclaim on March 20, 2020, objecting to Appellant's  
6 claims and submitting several counterclaims. Subsequently, on September 23, 2020, Respondents filed  
7 a Motion for Summary Judgment. In it, Respondents alleged Appellant lacked standing to commence  
8 litigation against them because Appellant's ex-wife had been awarded all rights, title, and interest to  
9 Appellant's interest in Valley Ascent, LLC in a Judgment and Decree of Divorce in the State of Utah.

10 Despite Appellant's opposition to Respondents' claims, the District Court granted summary  
11 judgment on November 13, 2020, finding Appellant failed to demonstrate a right to pursue any of the  
12 claims asserted in his Complaint. The District Court subsequently dismissed the case on February 25,  
13 2021 after a Motion from Respondents requesting their counterclaims be dismissed. With the  
14 dismissal of the counterclaims the decision of the Court on the Motion for Summary Judgment became  
15 final.

16 **11. INDICATE WHETHER THE CASE HAS PREVIOUSLY BEEN THE SUBJECT OF AN**  
17 **APPEAL TO OR ORIGINAL WRIT PROCEEDING IN THE SUPREME COURT AND,**  
18 **IF SO, THE CAPTION AND SUPREME COURT DOCKET NUMBER OF THE PRIOR**  
**PROCEEDING:**

19 This case has not previously been the subject of an appeal to or original writ proceeding in the  
20 Supreme Court.

21 **12. INDICATE WHETHER THIS APPEAL INVOLVES CHILD CUSTODY OR**  
22 **VISITATION:**

23 This appeal does not involve child custody or visitation.

24 **13. IF THIS IS A CIVIL CASE, INDICATE WHETHER THIS APPEAL INVOLVES THE**  
25 **POSSIBILITY OF SETTLEMENT:**

26 Appellant remains open to the possibility of settling this appeal. The Court should note,  
27 however, that the parties have already participated in settlement discussion to no avail. On August 14,  
28 2020, the parties engaged in a remote Settlement Conference with Judicial Officer Timothy C.



1 Williams but were unable to resolve the matter.

2 DATED this 25<sup>th</sup> day of March, 2021.

3 ERICKSON & WHITAKER PC

4 BY 

5 BRIAN C. WHITAKER, ESQ.

6 Nevada Bar No. 2329

7 1349 Galleria Drive, Suite 200

8 Henderson, NV 89014

9 Attorney for Plaintiff/Counterdefendant

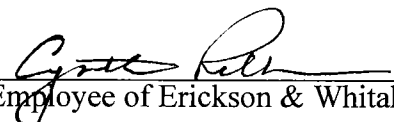
10 Brad L. Knowlton



**CERTIFICATE OF SERVICE**

I certify that I am an employee of Erickson & Whitaker PC, and that on the 25<sup>th</sup> day of March, 2021 I submitted the within CASE APPEAL STATEMENT to Odyssey eFileNV for filing and service through the District Court's electronic filing system to the following counsel of record:

Mark E. Ferrario; ferrariom@gtlaw.com  
Kara B. Hendricks; hendricksk@gtlaw.com  
Alayne M. Opie; opiea@gtlaw.com  
Attorneys for Defendants/Counterclaimants

  
Employee of Erickson & Whitaker PC



## EIGHTH JUDICIAL DISTRICT COURT

**CASE SUMMARY****CASE NO. A-20-809612-B****Brad Knowlton, Plaintiff(s)****vs.****William L Lindner and Maxine G Lindner Trust of 1988,  
Defendant(s)**§  
§  
§  
§  
§Location: **Department 11**  
Judicial Officer: **Gonzalez, Elizabeth**  
Filed on: **01/31/2020**  
Cross-Reference Case Number: **A809612****CASE INFORMATION**Case Type: **NRS Chapters 78-89**Case Status: **01/31/2020 Open****DATE****CASE ASSIGNMENT****Current Case Assignment**Case Number A-20-809612-B  
Court Department 11  
Date Assigned 01/31/2020  
Judicial Officer Gonzalez, Elizabeth**PARTY INFORMATION**

<b>Plaintiff</b>	<b>Knowlton, Brad L.</b>	<i>Lead Attorneys</i>
		<b>Whitaker, Brian C.</b> <i>Retained</i> 7024339696(W)
<b>Defendant</b>	<b>Juel A Parker Family Trust</b>	<b>Ferrario, Mark E., ESQ</b> <i>Retained</i> 702-792-3773(W)
	<b>Parker, Lisa</b>	<b>Ferrario, Mark E., ESQ</b> <i>Retained</i> 702-792-3773(W)
	<b>Steven Bruce Parker Family Trust</b>	<b>Ferrario, Mark E., ESQ</b> <i>Retained</i> 702-792-3773(W)
	<b>Valley Ascent, LLC</b>	
	<b>William L Lindner and Maxine G Lindner Trust of 1988</b>	<b>Ferrario, Mark E., ESQ</b> <i>Retained</i> 702-792-3773(W)
<b>Counter Claimant</b>	<b>Juel A Parker Family Trust</b> Removed: 02/25/2021 Dismissed	<b>Ferrario, Mark E., ESQ</b> <i>Retained</i> 702-792-3773(W)
	<b>Lindner, William L</b> Removed: 02/25/2021 Dismissed	<b>Ferrario, Mark E., ESQ</b> <i>Retained</i> 702-792-3773(W)
	<b>Parker, Juel A</b> Removed: 02/25/2021 Dismissed	<b>Ferrario, Mark E., ESQ</b> <i>Retained</i> 702-792-3773(W)
	<b>Parker, Lisa</b> Removed: 02/25/2021 Dismissed	<b>Ferrario, Mark E., ESQ</b> <i>Retained</i> 702-792-3773(W)
	<b>Steven Bruce Parker Family Trust</b>	<b>Ferrario, Mark E., ESQ</b>

**CASE SUMMARY****CASE NO. A-20-809612-B**

Removed: 02/25/2021  
Dismissed

*Retained*  
702-792-3773(W)

**William L Lindner and Maxine G Lindner Trust of 1988**

Removed: 02/25/2021  
Dismissed

**Ferrario, Mark E., ESQ**

*Retained*  
702-792-3773(W)

**Counter  
Defendant**

**Knowlton, Brad L.**

Removed: 02/25/2021  
Dismissed

**Whitaker, Brian C.**

*Retained*  
7024339696(W)

**Trustee****Lindner, William L****Ferrario, Mark E., ESQ**

*Retained*  
702-792-3773(W)

**Parker, Juel A****Ferrario, Mark E., ESQ**

*Retained*  
702-792-3773(W)

**Parker, Lisa**

Removed: 03/25/2020  
Data Entry Error

**Parker, Lisa****Ferrario, Mark E., ESQ**

*Retained*  
702-792-3773(W)

DATE	EVENTS & ORDERS OF THE COURT	INDEX
	<b><u>EVENTS</u></b>	
01/31/2020	Complaint (Business Court) Filed By: Plaintiff Knowlton, Brad L. <i>Complaint</i>	
01/31/2020	 Initial Appearance Fee Disclosure Filed By: Plaintiff Knowlton, Brad L. <i>Initial Appearance Fee Disclosure</i>	
01/31/2020	 Redacted Version <i>PER MOTION PENDING ORDER 3/19/20 Redacted version of Complaint (provided by Motion)</i>	
02/04/2020	 Summons Electronically Issued - Service Pending Party: Plaintiff Knowlton, Brad L. <i>Summons on Valley Ascent, LLC</i>	
02/04/2020	 Summons Electronically Issued - Service Pending Party: Plaintiff Knowlton, Brad L. <i>Summons on William L. Lindner, as Trustee of the William L. Lindner and Maxine G. Lindner Trust of 1988</i>	
02/04/2020	 Summons Electronically Issued - Service Pending Party: Plaintiff Knowlton, Brad L. <i>Summons on Juel A. Parker, as Trustee of the Juel A. Parker Family Trust</i>	
02/04/2020	 Summons Electronically Issued - Service Pending Party: Plaintiff Knowlton, Brad L. <i>Summons on Lisa A. Parker, as Trustee of the Juel A. Parker Family Trust</i>	
02/04/2020	 Summons Electronically Issued - Service Pending	

**CASE SUMMARY**

**CASE NO. A-20-809612-B**

Party: Plaintiff Knowlton, Brad L.  
*Summons on Lisa A. Parker*

02/04/2020



Summons Electronically Issued - Service Pending

Party: Plaintiff Knowlton, Brad L.

*Summons on S. Bruce Parker, as Trustee of the Steven Bruce Parker Family Trust*

02/27/2020



Acceptance of Service

Filed By: Plaintiff Knowlton, Brad L.

Party Served: Attorney Beckstrom, Steven W.; Defendant William L Lindner and Maxine G Lindner Trust of 1988; Defendant Valley Ascent, LLC; Defendant Juel A Parker Family Trust; Trustee Parker, Lisa; Defendant Steven Bruce Parker Family Trust; Trustee Parker, Lisa

*Acceptance of Service of Summons and Complaint*

02/27/2020



Affidavit of Service

Filed By: Plaintiff Knowlton, Brad L.

*Affidavit of Service*

03/02/2020

Motion for Preliminary Injunction

Filed By: Plaintiff Knowlton, Brad L.

*Motion for Preliminary Injunction of Order Shortening Time*

03/02/2020



Redacted Version

*PER MOTION PENDING ORDER 3/19/20 Redacted version of Motion for Preliminary Injunction (provided by Motion)*

03/03/2020



Receipt of Copy

Filed by: Plaintiff Knowlton, Brad L.

*Receipt of Copy*

03/06/2020



Initial Appearance Fee Disclosure

Filed By: Defendant William L Lindner and Maxine G Lindner Trust of 1988; Defendant Juel A Parker Family Trust; Defendant Steven Bruce Parker Family Trust; Trustee Parker, Lisa

*Initial Appearance Fee Disclosure*

03/06/2020



Opposition to Motion

Filed By: Defendant William L Lindner and Maxine G Lindner Trust of 1988; Defendant Juel A Parker Family Trust; Trustee Parker, Lisa; Defendant Steven Bruce Parker Family Trust; Trustee Parker, Lisa

*Defendants Opposition to Plaintiff's Motion for Preliminary Injunction on Order Shortening Time and Countermotion to Appoint Interim Manager and Order Compelling Plaintiff to Produce Valley Ascent, LLC's Books and Records*

03/19/2020



Motion to Seal/Redact Records

Filed By: Plaintiff Knowlton, Brad L.

*Ex Parte Motion to Seal, Redact or Deem Protected (1) Complaint, and (2) Motion for Preliminary Injunction*

03/19/2020



Order

Filed By: Defendant William L Lindner and Maxine G Lindner Trust of 1988; Defendant Juel A Parker Family Trust; Trustee Parker, Lisa; Defendant Steven Bruce Parker Family Trust; Trustee Parker, Lisa

*Order Regarding Plaintiff's Motion for Preliminary Injunction on Order Shortening Time and Countermotion to Appoint Interim Manager and Order Compelling Plaintiff to Produce Valley Ascent, LLC's Books and Records*

# CASE SUMMARY

CASE NO. A-20-809612-B

03/20/2020	 Notice of Entry of Order Filed By: Defendant William L Lindner and Maxine G Lindner Trust of 1988; Defendant Juel A Parker Family Trust; Trustee Parker, Lisa; Defendant Steven Bruce Parker Family Trust; Trustee Parker, Lisa <i>Notice of Entry of Order</i>
03/20/2020	 Answer and Counterclaim Filed By: Defendant William L Lindner and Maxine G Lindner Trust of 1988; Defendant Juel A Parker Family Trust; Trustee Parker, Lisa; Defendant Steven Bruce Parker Family Trust; Trustee Parker, Lisa <i>Answer and Counterclaims</i>
03/20/2020	 Demand for Jury Trial Filed By: Defendant William L Lindner and Maxine G Lindner Trust of 1988; Defendant Juel A Parker Family Trust; Trustee Parker, Lisa; Defendant Steven Bruce Parker Family Trust; Trustee Parker, Lisa <i>Demand for Jury Trial</i>
03/23/2020	 Filing Fee Remittance Filed By: Defendant William L Lindner and Maxine G Lindner Trust of 1988; Trustee Parker, Lisa <i>Filing Fee Remittance</i>
03/23/2020	 Filing Fee Remittance Filed By: Defendant Steven Bruce Parker Family Trust <i>Filing Fee Remittance - Add'l Party</i>
03/23/2020	 Filing Fee Remittance Filed By: Defendant Juel A Parker Family Trust <i>Filing Fee Remittance - Add'l Party</i>
03/24/2020	 Errata Filed By: Plaintiff Knowlton, Brad L. <i>Errata to Ex Parte Motion to Seal, Redact or Deem Protected (1) Complaint, and (2) Motion for Preliminary Injunction</i>
04/09/2020	 Answer to Counterclaim Filed By: Plaintiff Knowlton, Brad L. <i>Answer to Counterclaim</i>
05/01/2020	 Notice of Submission of Record Filed By: Defendant William L Lindner and Maxine G Lindner Trust of 1988; Defendant Juel A Parker Family Trust; Defendant Steven Bruce Parker Family Trust; Trustee Parker, Lisa; Trustee Lindner, William L; Trustee Parker, Juel A <i>Notice of Submission</i>
05/01/2020	 Notice Filed By: Plaintiff Knowlton, Brad L. <i>Notice Regarding Continued Hearing on Plaintiff's Ex Parte Motion to Redact or File Under Seal (1) Exhibit 1 to the Complaint, and (2) Exhibit 3 to the Declaration of Brad L. Knowlton in Support of Motion for Preliminary Injunction</i>
06/08/2020	 Business Court Order <i>Business Court Order</i>
06/24/2020	 Scheduling and Trial Order

# CASE SUMMARY

CASE NO. A-20-809612-B

*Business Court Scheduling Order and Order Setting Civil Jury Trial, Pretrial Conference, and Calendar Call*

08/05/2020



Notice of Hearing

*Notice of Telephonic Status Check Hearing*

08/10/2020



Notice

Filed By: Defendant William L Lindner and Maxine G Lindner Trust of 1988; Defendant Valley Ascent, LLC; Defendant Juel A Parker Family Trust; Defendant Steven Bruce Parker Family Trust; Trustee Parker, Lisa; Trustee Lindner, William L; Trustee Parker, Juel A  
*Notice of Assignment of Membership Interest in Valley Ascent, LLC*

09/23/2020



Motion for Summary Judgment

Filed By: Defendant William L Lindner and Maxine G Lindner Trust of 1988; Defendant Valley Ascent, LLC; Defendant Juel A Parker Family Trust; Defendant Steven Bruce Parker Family Trust; Trustee Parker, Lisa; Trustee Lindner, William L; Trustee Parker, Juel A  
*Defendants' Motion for Summary Judgment*

09/24/2020



Clerk's Notice of Hearing

*Notice of Hearing*

10/07/2020



Opposition to Motion For Summary Judgment

Filed By: Plaintiff Knowlton, Brad L.  
*Opposition to Defendants' Motion for Summary Judgment*

10/26/2020



Reply in Support

Filed By: Defendant William L Lindner and Maxine G Lindner Trust of 1988; Defendant Juel A Parker Family Trust; Defendant Steven Bruce Parker Family Trust; Trustee Parker, Lisa; Trustee Lindner, William L; Trustee Parker, Juel A  
*Reply in Support of Defendants' Motion for Summary Judgment*

11/05/2020



Transcript of Proceedings

*Transcript of Proceedings: Defendants' Motion for Summary Judgment*

11/13/2020



Order

Filed By: Trustee Lindner, William L  
*Order Granting Defendants Motion for Summary Judgment*

11/13/2020



Notice of Entry of Order

Filed By: Defendant William L Lindner and Maxine G Lindner Trust of 1988; Defendant Juel A Parker Family Trust; Defendant Steven Bruce Parker Family Trust; Trustee Parker, Lisa; Trustee Lindner, William L; Trustee Parker, Juel A  
*Notice of Entry of Order*

02/05/2021



Motion to Dismiss

Filed By: Defendant William L Lindner and Maxine G Lindner Trust of 1988; Defendant Juel A Parker Family Trust; Defendant Steven Bruce Parker Family Trust; Trustee Parker, Lisa; Trustee Lindner, William L; Trustee Parker, Juel A  
*Counterclaimants' Motion to Dismiss Counterclaims*

02/05/2021



Clerk's Notice of Hearing

*Notice of Hearing*

02/19/2021



Non Opposition

Filed By: Plaintiff Knowlton, Brad L.

# CASE SUMMARY

CASE NO. A-20-809612-B

*Statement of Non-Opposition to Counterclaimant's Motion to Dismiss Counterclaims*

02/25/2021



Order

*Order Granting Counterclaimants Motion to Dismiss Counterclaims*

02/25/2021



Notice of Entry of Order

Filed By: Defendant William L Lindner and Maxine G Lindner Trust of 1988; Defendant Juel A Parker Family Trust; Defendant Steven Bruce Parker Family Trust; Trustee Parker, Lisa; Trustee Lindner, William L; Trustee Parker, Juel A

*Notice of Entry of Order*

03/25/2021



Substitution of Attorney

Filed by: Plaintiff Knowlton, Brad L.

*Substitution of Attorneys*

03/25/2021



Notice of Appeal

Filed By: Plaintiff Knowlton, Brad L.

*Notice of Appeal*

03/25/2021



Case Appeal Statement

Filed By: Plaintiff Knowlton, Brad L.

*Case Appeal Statement*

## **DISPOSITIONS**

11/13/2020

**Summary Judgment** (Judicial Officer: Gonzalez, Elizabeth)

Debtors: Brad L. Knowlton (Counter Defendant, Plaintiff)

Creditors: William L Lindner and Maxine G Lindner Trust of 1988 (Counter Claimant, Defendant), Juel A Parker Family Trust (Counter Claimant, Defendant), Steven Bruce Parker Family Trust (Counter Claimant, Defendant), Lisa Parker (Counter Claimant, Defendant), William L Lindner (Counter Claimant), Juel A Parker (Counter Claimant)

Judgment: 11/13/2020, Docketed: 11/13/2020

02/25/2021

**Order of Dismissal With Prejudice** (Judicial Officer: Gonzalez, Elizabeth)

Debtors: Brad L. Knowlton (Counter Defendant)

Creditors: William L Lindner and Maxine G Lindner Trust of 1988 (Counter Claimant), Juel A Parker Family Trust (Counter Claimant), Steven Bruce Parker Family Trust (Counter Claimant), Lisa Parker (Counter Claimant), William L Lindner (Counter Claimant), Juel A Parker (Counter Claimant)

Judgment: 02/25/2021, Docketed: 02/25/2021

## **HEARINGS**

03/09/2020



**Motion for Preliminary Injunction** (9:00 AM) (Judicial Officer: Gonzalez, Elizabeth)

*Plaintiff's Motion for Preliminary Injunction of Order Shortening Time*

Denied;

Journal Entry Details:

*Following arguments by Mr. Beckstrom and Mr. Ferrario, COURT ORDERED, injunctive relief will be DENIED at this point; there has been a facial showing of financial misconduct by the management fee that was taken and the failure to provide books and records as requested by the other members. At this time the Court will NOT CONFIRM Ms. Lisa Parker as interim manager and will APPOINT Brian Gordon who has previously been used by the company to act as the interim manager. The Court will not permit him at any time to testify as an expert for either side; he will manage the ongoing daily operations and respond to document requests by the members. Counsel for Defendants to prepare the order.;*

03/31/2020



**Minute Order** (8:32 AM) (Judicial Officer: Gonzalez, Elizabeth)

*Minute Order Suspending Requirements*

Minute Order - No Hearing Held;

# CASE SUMMARY

CASE NO. A-20-809612-B

Journal Entry Details:

*COURT ORDERED, pursuant to Administrative Order 20-01 the time requirements of NRCP 16(b)(2) are SUSPENDED, and the requirement of filing a Joint Case Conference Report is SUSPENDED. CLERK'S NOTE: A copy of this minute order was provided to Odyssey File and Serve. / dr 3-31-20;*

04/03/2020



**Motion to Seal/Redact Records** (9:01 AM) (Judicial Officer: Gonzalez, Elizabeth)

**04/03/2020, 04/17/2020, 05/01/2020**

Events: 03/19/2020 Motion to Seal/Redact Records

*Ex Parte Motion to Seal, Redact or Deem Protected (1) Complaint, and (2) Motion for Preliminary Injunction*

Matter Continued;

Matter Continued;

Off Calendar;

Journal Entry Details:

*COURT ORDERED, given the notice of submission of redacted versions, matter OFF CALENDAR. CLERK'S NOTE: A copy of this minute order was distributed via Odyssey File and Serve. / dr 5-4-20;*

Matter Continued;

Matter Continued;

Off Calendar;

Journal Entry Details:

*COURT NOTED no supplement to redactions provided, ORDERED, matter CONTINUED for 2 weeks. ...5-1-20 - CHAMBERS CLERK'S NOTE: A copy of this minute order was distributed via Odyssey File and Serve. / dr 4-20-20;*

Matter Continued;

Matter Continued;

Off Calendar;

Journal Entry Details:

*COURT ORDERED, the ex parte motion to seal the complaint and motion for preliminary injunction filed March 19, 2020 is DENIED. The Court has reviewed the "Redacted" versions which contain only one redaction. Plaintiff may within 10 days provide proposed redactions in addition to the one social security number that has been redacted. Matter CONTINUED to April 17, 2020 in chambers. 4-17-20 CHAMBERS EX PARTE MOTION TO SEAL, REDACT OR DEEM PROTECTED (1) COMPLAINT, AND (2) MOTION FOR PRELIMINARY INJUNCTION CLERK'S NOTE: A copy of this minute order was distributed via Odyssey File and Serve. / dr 4-3-20;*

06/22/2020



**Mandatory Rule 16 Conference** (9:00 AM) (Judicial Officer: Gonzalez, Elizabeth)

Trial Date Set;

Journal Entry Details:

*All parties appeared by telephone. Ms. Hendricks advised, noting no offense meant to Mr. Beckstrom, that his client has ownership over 30% of the interest in the LLC lost as part of the divorce proceeding, so his ex-wife will now be a controlling member; this case is ripe for a settlement conference before they spend additional time and money on discovery. Mr. Beckstrom responded that while he does not necessarily agree with the claims going away in light of the divorce, he does agree with the case being ripe for a settlement conference. Parties advised they have not yet done their initial disclosures. Per the parties' request, matter REFERRED to Judge Williams for a settlement conference on Friday, August 14, 2020. COURT ORDERED as follows: Initial disclosures pursuant to rule 16.1 to be exchanged in 2 weeks; Motions to amend pleadings or add parties TO BE FILED by August 7, 2020; Initial expert disclosures where a party bears the burden of proof DUE by November 20, 2020; Rebuttal expert disclosures where a party does not bear the burden of proof DUE by January 29, 2021; Discovery cut-off SET for March 22, 2021; Dispositive motions and motions in limine TO BE FILED by May 7, 2021; Matter SET for trial on the stack beginning on June 28, 2021. Jury DEMANDED. Trial Setting Order will ISSUE. Parties advised they do not need an ESI Protocol or Stipulated Protective Order and that they do not have any issues with the Rule on 10 depositions per side, not including custodians of records, and the 7-hour limit per deposition. COURT ORDERED, today is the parties' joint case conference and the filing of the joint case conference report (JCCR) is WAIVED. 8-14-20 9:30 AM SETTLEMENT CONFERENCE (DEPT XVI - Williams);*

08/11/2020






**Status Check** (9:00 AM) (Judicial Officer: Williams, Timothy C.)



EIGHTH JUDICIAL DISTRICT COURT

**CASE SUMMARY**

**CASE NO. A-20-809612-B**

	<p><i>Status Check re Remote Settlement Conference</i></p> <p>Matter Heard;</p> <p>Journal Entry Details:</p> <p><i>Colloquy regarding nature of dispute, ongoing settlement discussions, and manner that 8/14/20 settlement conference to proceed. Upon Court's inquiry, Mr. Beckstrom advised his side intends to proceed remotely for the conference; Ms. Hendricks advised counsel and client representative with her intend to appear in-person. COURT ORDERED, will require all appearances and discussions be remote in light of current health environment as discussed. COURT FURTHER ORDERED, settlement briefs DUE Thursday, August 13, 2020 by 10:00 a.m.; submissions to be made by email to Dept16LC@clarkcountycourts.us. Colloquy regarding coordinating remote appearances. Court directed parties coordinate with Courtroom Clerk prior to the conference to establish their connection and use of private sessions. Courtroom Clerk advised will initiate communication with counsel in that regard.;</i></p>
08/14/2020	<p> <b>Settlement Conference (9:30 AM)</b> (Judicial Officer: Williams, Timothy C.)</p> <p>Matter Heard;</p> <p>Journal Entry Details:</p> <p><i>The above-referenced matter came on for a settlement conference with Judge Williams on August 14, 2020. The Plaintiff, Brad Knowlton, was present and represented by Steven Beckstrom, Esq. The Defendants Lisa Parker, Bruce Parker, and William Linder, were present and represented by Kara Hendricks, Esq. and Mark Ferrario, Esq. Unfortunately, the parties were unable to resolve their differences and the case did not settle. The case is now referred back to the originating department for further handling.;</i></p>
11/02/2020	<p> <b>Motion for Summary Judgment (9:00 AM)</b> (Judicial Officer: Gonzalez, Elizabeth)</p> <p><i>Defendants' Motion for Summary Judgment</i></p> <p>Granted;</p> <p>Journal Entry Details:</p> <p><i>Parties appeared by telephone. Following arguments by Mr. Ferrario and Mr. Beckstrom, COURT ORDERED, here there are no genuine issues of material fact as the assignment resolves all of the currently pled claims, because they are intricately intertwined with the ownership issues; for that reason, the motion for summary judgment is GRANTED. Mr. Ferrario to prepare the order and run it by Mr. Beckstrom prior to submission. COURT FURTHER ORDERED, all future dates VACATED.;</i></p>
03/08/2021	<p> <b>Motion to Dismiss (9:00 AM)</b> (Judicial Officer: Gonzalez, Elizabeth)</p> <p><i>Counterclaimants' Motion to Dismiss Counterclaims</i></p> <p>Granted;</p> <p>Journal Entry Details:</p> <p><i>Pursuant to Administrative Order 21-01, the Court decides this matter without the necessity of oral argument. The Court, having reviewed Counterclaimants' Motion to Dismiss their Counterclaims and the related briefing and being fully informed, GRANTS the motion. Counsel for Counterclaimant is directed to submit a proposed order approved by opposing counsel consistent with the foregoing within ten (10) days and distribute a filed copy to all parties involved in this matter. Such order should set forth a synopsis of the supporting reasons proffered to the Court in briefing. This Decision sets forth the Court's intended disposition on the subject but anticipates further order of the Court to make such disposition effective as an order. CLERK'S NOTE: A copy of this minute order was distributed via Odyssey File and Serve. / dr 3-8-21 ;</i></p>
03/29/2021	<p><b>CANCELED Status Check: Trial Setting (9:00 AM)</b> (Judicial Officer: Gonzalez, Elizabeth)</p> <p><i>Vacated - per Judge</i></p>
06/03/2021	<p><b>CANCELED Pre Trial Conference (9:15 AM)</b> (Judicial Officer: Gonzalez, Elizabeth)</p> <p><i>Vacated - per Judge</i></p>
06/22/2021	<p><b>CANCELED Calendar Call (9:30 AM)</b> (Judicial Officer: Gonzalez, Elizabeth)</p> <p><i>Vacated - per Judge</i></p>
06/28/2021	<p><b>CANCELED Jury Trial (1:30 PM)</b> (Judicial Officer: Gonzalez, Elizabeth)</p> <p><i>Vacated - per Judge</i></p>
DATE	FINANCIAL INFORMATION

**CASE SUMMARY****CASE NO. A-20-809612-B****Defendant** Valley Ascent, LLC

Total Charges 200.00

Total Payments and Credits 200.00

**Balance Due as of 3/29/2021 0.00****Defendant** William L Lindner and Maxine G Lindner Trust of 1988

Total Charges 1,573.00

Total Payments and Credits 1,573.00

**Balance Due as of 3/29/2021 0.00****Plaintiff** Knowlton, Brad L.

Total Charges 1,557.00

Total Payments and Credits 1,557.00

**Balance Due as of 3/29/2021 0.00****Trustee** Lindner, William L

Total Charges 0.00

Total Payments and Credits 0.00

**Balance Due as of 3/29/2021 0.00****Plaintiff** Knowlton, Brad L.

Appeal Bond Balance as of 3/29/2021 500.00

# BUSINESS COURT CIVIL COVER SHEET

Clark County, Nevada  
Case No. \_\_\_\_\_  
(Assigned by Clerk's Office)

**CASE NO: A-20-809612-B**  
**Department 11**

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

Plaintiff(s) (name/address/phone): <p style="text-align: center;">Brad L. Knowlton</p>	Defendant(s) (name/address/phone): <p style="text-align: center;">Valley Ascent, LLC; William L. Linder, Trustee; Juel A. Parker, Trustee; Lisa Parker, Trustee; S. Bruce Parker Trustee</p>
Attorney (name/address/phone): <p style="text-align: center;">Steven W. Beckstrom Snow Christensen &amp; Martineau 555 S. Bluff Street, Suite 301, St. George, UT 84770 (435) 673-8288</p>	Attorney (name/address/phone): <p style="text-align: center;">Kara B. Hendricks Greenberg Traurig, LLP 10845 Griffith Peak Drive, Suite 600, Las Vegas, NV 89135 (702) 792-3773</p>

## II. Nature of Controversy *(Please check the applicable boxes for both the civil case type and business court case type)*

☐ Arbitration Requested

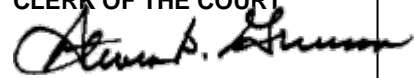
Civil Case Filing Types		Business Court Filing Types		
<b>Real Property</b> <b>Landlord/Tenant</b> <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant <b>Title to Property</b> <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property <b>Other Real Property</b> <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	<b>Torts</b> <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>Other Torts</b> <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort	<b>CLARK COUNTY BUSINESS COURT</b> <input checked="" type="checkbox"/> NRS Chapters 78-89 <input type="checkbox"/> Commodities (NRS 91) <input type="checkbox"/> Securities (NRS 90) <input type="checkbox"/> Mergers (NRS 92A) <input type="checkbox"/> Uniform Commercial Code (NRS 104) <input type="checkbox"/> Purchase/Sale of Stock, Assets, or Real Estate <input type="checkbox"/> Trademark or Trade Name (NRS 600) <input type="checkbox"/> Enhanced Case Management <input checked="" type="checkbox"/> Other Business Court Matters		
<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>Civil Writs</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>WASHOE COUNTY BUSINESS COURT</b> <input type="checkbox"/> NRS Chapters 78-88 <input type="checkbox"/> Commodities (NRS 91) <input type="checkbox"/> Securities (NRS 90) <input type="checkbox"/> Investments (NRS 104 Art.8) <input type="checkbox"/> Deceptive Trade Practices (NRS 598) <input type="checkbox"/> Trademark/Trade Name (NRS 600) <input type="checkbox"/> Trade Secrets (NRS 600A) <input type="checkbox"/> Enhanced Case Management <input type="checkbox"/> Other Business Court Matters		
<b>Judicial Review/Appeal/Other Civil Filing</b> <table style="width: 100%;"> <tr> <td style="width: 50%;"> <b>Judicial Review</b>  <input type="checkbox"/> Foreclosure Mediation Case  <b>Appeal Other</b>  <input type="checkbox"/> Appeal from Lower Court                         </td> <td style="width: 50%;"> <b>Other Civil Filing</b>  <input type="checkbox"/> Foreign Judgment  <input type="checkbox"/> Other Civil Matters                         </td> </tr> </table>		<b>Judicial Review</b> <input type="checkbox"/> Foreclosure Mediation Case <b>Appeal Other</b> <input type="checkbox"/> Appeal from Lower Court	<b>Other Civil Filing</b> <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters	
<b>Judicial Review</b> <input type="checkbox"/> Foreclosure Mediation Case <b>Appeal Other</b> <input type="checkbox"/> Appeal from Lower Court	<b>Other Civil Filing</b> <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters			

11/3/20

Date



Signature of initiating party or representative



**ORDR**

MARK E. FERRARIO, ESQ.

Nevada Bar No. 1625

KARA B. HENDRICKS, ESQ.

Nevada Bar No. 7743

ALAYNE M. OPIE, ESQ.

Nevada Bar No. 12623

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[opiea@gtlaw.com](mailto:opiea@gtlaw.com)

*Attorneys for WILLIAM L. LINDNER as Trustee of the William L. Lindner and Maxine G. Lindner Trust of 1988; JUEL A. PARKER, individually and as Trustee of the Juel A. Parker Family Trust; LISA PARKER, individually and as Trustee of the Juel A. Parker Family Trust; and S. BRUCE PARKER, as Trustee of the Steven Bruce Parker Family Trust*

**EIGHTH JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

BRAD L. KNOWLTON, an individual,

Plaintiff,

v.

VALLEY ASCENT, LLC, a Nevada limited liability company, WILLIAM L. LINDNER, as Trustee of the William L. Lindner and Maxine G. Lindner Trust of 1988, JUEL A. PARKER, as Trustee of the Juel A. Parker Family Trust, LISA PARKER, as Trustee of the Juel A. Parker Family Trust, LISA PARKER, an individual, and S. BRUCE PARKER, as Trustee of the Steven Bruce Parker Family Trust,

Defendants.

**CASE NO: A-20-809612-B**

**DEPT. XI**

**ORDER GRANTING DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT**

**Date of Hearing November 2, 2020  
Time: 9:00 am**

1 WILLIAM L. LINDNER, as Trustee of the William  
2 L. Lindner and Maxine G. Lindner Trust of 1988,  
3 individually and derivatively; LISA PARKER, as  
4 Trustee of the Juel A. Parker Family Trust,  
5 individually and derivatively; S. BRUCE PARKER,  
as Trustee of the Steven Bruce Parker Family Trust,  
individually and derivatively, and JUEL PARKER,  
individually,

6 Counter-Plaintiffs,

7 v.

8 BRAD L. KNOWLTON, individually and  
9 derivatively; and DOE Individuals I-X and ROE  
Entities I-X, inclusive,

10 Counter-Defendant,

11 and

12 Nominal party VALLEY ASCENT, LLC, a Nevada  
13 limited liability company.

14 On November 2, 2020, the Court heard oral argument on the Motion for Summary Judgment  
15 (“Motion”) filed by Defendants/Counterclaimants WILLIAM L. LINDNER, as Trustee of the  
16 William L. Lindner and Maxine G. Lindner Trust of 1988; JUEL A. PARKER, individually and as  
17 Trustee of the Juel A. Parker Family Trust; LISA PARKER, individually and as Trustee of the Juel  
18 A. Parker Family Trust; and S. BRUCE PARKER, as Trustee of the Steven Bruce Parker Family  
19 Trust (collectively “Defendants”). The Court, having considered the Motion, the Opposition to the  
20 Motion filed by Brad L. Knowlton, Defendants’ Reply in Support of the Motion, and all the  
21 arguments of counsel for all parties present at the hearing for this matter held on November 2, 2020,  
22 finds and orders as follows:

23 **FINDINGS OF FACT**

24 1. Defendants moved the Court for an order granting summary judgment on the claims  
25 asserted by Plaintiff Brad L. Knowlton (“Knowlton”) contending that Knowlton lacked standing to  
26 proceed on the claims pled in the Complaint.

27 ///

28 ///

2. Prior to June 19, 2020, Defendants and Mr. Knowlton had membership interests in Valley Ascent, LLC (“Valley Ascent”) as follows: Mr. Knowlton 38.55%; Juel Parker Trust 36.45%; Lindner Trust 20%; and S. Bruce Parker Trust 5%.

3. On or about June 27, 2017, Shondell Swenson filed for divorce against Brad L. Knowlton, said proceeding bearing Utah Civil Case No. 174701016.

4. After battling with highly-contentious divorce proceedings for nearly three years, the Court in Utah divided the marital assets and liabilities, and entered a Judgment and Decree of Divorce on June 5, 2020.

5. In connection therewith, Ms. Swenson was awarded all rights, title and interest to Mr. Knowlton’s 38.55% membership interest in Valley Ascent.

6. On or about June 19, 2020, Mr. Knowlton executed an Assignment of Membership Interest in Valley Ascent (“Assignment”).

7. Therein, Mr. Knowlton “transfer[ed] and assign[ed] his interest in Valley Ascent, LLC, a Nevada Limited Liability Company, to Shondell Swenson; and...permanently relinquish[ed], waiv[ed], and/or release[d] any and all rights, interests, and/or claims related to his ownership interest in Valley Ascent, LLC, all of which have been transferred to Shondell Swenson by virtue of this Assignment of Interest.”

8. Said Assignment was filed in this action on August 10, 2020.

9. By way of the Assignment, all of Mr. Knowlton’s claims pled in the instant action were transferred to Ms. Swenson.

10. If any finding of fact is properly a conclusion of law, it shall be treated as if it was appropriately identified and designated.

### **CONCLUSIONS OF LAW**

#### **A. STANDARD OF REVIEW.**

1. Summary judgment under Rule 56 is appropriate and “shall be rendered forthwith” when the pleadings and other evidence on file demonstrate that no “genuine issue as to any material fact [remains] and that the moving party is entitled to judgment as a matter of law.” *See* NRCPC 56(c), *Tucker v. Action Equip. and Scaffold Co.*, 113 Nev. 1349, 1353, 951 P.2d 1027, 1029 (1997).

1 The Nevada Supreme Court has defined a *genuine issue* as “evidence such that a rational trier of  
2 fact could return a verdict for the nonmoving party.” *Id.* (citing *Matsushita Electric Industrial Co.*  
3 *v. Zenith Radio*, 475 U.S. 574, 586 (1986)). As to materiality, only disputes over facts that might  
4 affect the outcome of the suit under the governing law will preclude the entry of summary judgment.  
5 *Wood v. Safeway, Inc.*, 121 Nev. 724, 121 P.3d 1026, 1030 (2005). Factual disputes which are  
6 irrelevant or unnecessary will not be considered. *Id.* Summary judgment is appropriate if the  
7 nonmoving party fails to set forth facts demonstrating the existence of a genuine issue. *Bulbman,*  
8 *Inc. v. Nevada Bell*, 108 Nev. 105, 110, 825 P.2d 588, 592 (1992).

9         2.         Here, there are no issues of material or genuine fact that prevent granting summary  
10 judgment.

11 **B.         KNOWLTON LACKS STANDING TO PURSUE THE CLAIMS ASSERTED IN THE**  
12 **COMPLAINT.**

13         1.         Under Nevada law, an action must be commenced by the real party-in-interest – “one  
14 who possesses the right to enforce the claim and has a significant interest in the litigation.” *Szilagyi*  
15 *v. Testa*, 99 Nev. 834, 838, 673 P.2d 495, 498 (1983); *see* NRCP 17(a). Due to this limitation, a party  
16 generally has standing to assert only its own rights and cannot raise the claims of a third party not  
17 before the court. *See Deal v. 999 Lakeshore Association*, 94 Nev. 301, 304, 579 P.2d 775, 777 (1978).  
18 The burden of demonstrating the right to pursue a claim is properly placed upon the claimant.  
19 *Mortgage Elec. Reg. Sys. v. Chong*, 2009 U.S. Dist. LEXIS 127500 at \*6 (D. Nev. Dec. 4, 2009).

20         2.         Mr. Knowlton failed to demonstrate a right to pursue any of the claims asserted in the  
21 Complaint after transferring and assigning his interest in Valley Ascent to Ms. Swenson and  
22 permanently relinquishing, waiving, and/or releasing any and all rights, interests, and/or claims  
23 related to his ownership interest in Valley Ascent, as set forth in the Assignment.

24         3.         The Assignment resolves all currently pled claims because all are intricately  
25 intertwined with the ownership of Valley Ascent.

26         4.         Accordingly, Defendants are entitled to summary judgment in their favor on all of  
27 Mr. Knowlton’s claims, including (1) breach of contract, (2) breach of the implied covenant of good  
28 faith and fair dealing, (3) declaratory relief, (4) intentional interference with contractual relations,

(5) expulsion as a member, (6) breach of fiduciary duties, (7) receivership and (8) preliminary injunction.

**ORDER**

Based on the foregoing, and good cause appearing therefor:

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that Defendants/Counterclaimants' Motion for Summary Judgment is **GRANTED**.

**IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that judgment is rendered in Defendants/Counterclaimants' favor on all claims asserted in the Complaint, specifically, Mr. Knowlton's claims for (1) breach of contract, (2) breach of the implied covenant of good faith and fair dealing, (3) declaratory relief, (4) intentional interference with contractual relations, (5) expulsion as a member, (6) breach of fiduciary duties, (7) receivership and (8) preliminary injunction.

**IT IS SO ORDERED.**

DATED this 12th day of November, 2020.

  
DISTRICT COURT JUDGE

Respectfully Submitted by:

**GREENBURG TRAURIG, LLP**

/s/ Kara B. Hendricks  
MARK E. FERRARIO, ESQ.  
Nevada Bar No. 1625  
KARA B. HENDRICKS, ESQ.  
Nevada Bar No. 7743  
ALAYNE M. OPIE, ESQ.  
Nevada Bar No. 12623  
10845 Griffith Peak Drive, Suite 600  
Las Vegas, Nevada 89144

*Attorneys for Defendants/Counterclaimants*



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Approved as to form by:  
  
**SNOW, CHRISTENSEN & MARTINEAU**  
  
  
                  /s/ Steven W. Beckstrom                    
STEVEN W. BECKSTROM, ESQ.  
Nevada Bar No. 8372  
555 South Bluff Street, Suite 301  
St. George, Utah 84770  
and  
ANDREW D. SMITH, ESQ.  
Nevada Bar No. 8890  
**WINNER& SHERROD, LTD.**  
1117 South Rancho Drive  
Las Vegas, Nevada 89102  
  
*Attorneys for Plaintiff Brad L. Knowlton*

**From:** [Steven W. Beckstrom](#)  
**To:** [Hendricks, Kara \(Shld-LV-LT\)](#)  
**Subject:** Re: Knowlton v. Juel Order re: MSJ  
**Date:** Thursday, November 12, 2020 9:00:40 AM  
**Attachments:** [image001.png](#)

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This looks fine. You may affix my electronic signature to the document and file it with the Court.

---

**From:** hendricksk@gtlaw.com <hendricksk@gtlaw.com>  
**Sent:** Thursday, November 12, 2020 9:53 AM  
**To:** Steven W. Beckstrom <SWB@scmlaw.com>  
**Cc:** flintza@gtlaw.com <flintza@gtlaw.com>  
**Subject:** RE: Knowlton v. Juel Order re: MSJ

Thank you Steven. We have accepted your revisions. I also found a typo in the last paragraph which has been corrected. (The change is highlighted in the attached.)

Please confirm we have authorization to submit to the court with your e-signature.

Best,  
Kara

**Kara Hendricks**  
Shareholder

T 702.938.6856

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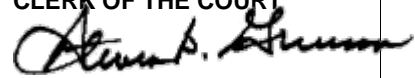
**From:** Steven W. Beckstrom <SWB@scmlaw.com>  
**Sent:** Monday, November 9, 2020 12:45 PM  
**To:** Hendricks, Kara (Shld-LV-LT) <hendricksk@gtlaw.com>  
**Subject:** Re: Knowlton v. Juel Order re: MSJ

**\*EXTERNAL TO GT\***

Kara- Attached are some revisions to the proposed orders that you prepared. My revisions are minor and are found in redline format. If these revisions are acceptable, please let me know. Thanks!

---

**From:** [hendricksk@gtlaw.com](#) <[hendricksk@gtlaw.com](#)>  
**Sent:** Thursday, November 5, 2020 2:18 PM  
**To:** Steven W. Beckstrom <[SWB@scmlaw.com](#)>  
**Subject:** Knowlton v. Juel Order re: MSJ



1 **NEO**  
2 MARK E. FERRARIO, ESQ.  
3 Nevada Bar No. 1625  
4 KARA B. HENDRICKS, ESQ.  
5 Nevada Bar No. 7743  
6 ALAYNE M. OPIE, ESQ.  
7 Nevada Bar No. 12623  
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11 Telephone: (702) 792-3773  
12 Facsimile: (702) 792-9002  
13 Email: [ferrariom@gtlaw.com](mailto:ferrariom@gtlaw.com)  
14 [hendricksk@gtlaw.com](mailto:hendricksk@gtlaw.com)  
15 [opiea@gtlaw.com](mailto:opiea@gtlaw.com)

16 *Attorneys for WILLIAM L. LINDNER as Trustee of*  
17 *the William L. Lindner and Maxine G. Lindner*  
18 *Trust of 1988; JUEL A. PARKER, individually and*  
19 *as Trustee of the Juel A. Parker Family Trust; LISA*  
20 *PARKER, individually and as Trustee of the Juel A.*  
21 *Parker Family Trust; and S. BRUCE PARKER, as*  
22 *Trustee of the Steven Bruce Parker Family Trust*

23 **EIGHTH JUDICIAL DISTRICT COURT**

24 **CLARK COUNTY, NEVADA**

25 BRAD L. KNOWLTON, an individual,  
26  
27 Plaintiff,

28 v.

29 VALLEY ASCENT, LLC, a Nevada limited liability  
30 company, WILLIAM L. LINDNER, as Trustee of  
31 the William L. Lindner and Maxine G. Lindner Trust  
32 of 1988, JUEL A. PARKER, as Trustee of the Juel  
33 A. Parker Family Trust, LISA PARKER, as Trustee  
34 of the Juel A. Parker Family Trust, LISA PARKER,  
35 an individual, and S. BRUCE PARKER, as Trustee  
36 of the Steven Bruce Parker Family Trust,

37 Defendants.

38 WILLIAM L. LINDNER, as Trustee of the William  
39 L. Lindner and Maxine G. Lindner Trust of 1988,  
40 indiviudally and derivatively; LISA PARKER, as  
41 Trustee of the Juel A. Parker Family Trust,  
42 indiviudally and derivatively; S. BRUCE PARKER,  
43 as Trustee of the Steven Bruce Parker Family Trust,

CASE NO: A-20-809612-B

DEPT. XI

NOTICE OF ENTRY OF ORDER

1 individually and derivatively, and JUEL PARKER,  
2 individually,

3  
4 Counter-Plaintiffs

5 v.

6 BRAD L. KNOWLTON, individually and  
7 derivatively; and DOE Individuals I-X and ROE  
8 Entities I-X, inclusive,

9 Counter-Defendant,

10 and

11 Nominal party VALLEY ASCENT, LLC, a Nevada  
12 limited liability company.

13 TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

14 YOU, AND EACH OF YOU, will please take notice that, on November 13, 2020, the Court  
15 entered an Order Granting Defendants' Motion for Summary Judgment, a copy of which is attached  
16 hereto as Exhibit "A."

17 DATED this 13<sup>th</sup> day of November, 2020.

18  
19 **GREENBURG TRAURIG, LLP**

20 /s/ Kara B. Hendricks

21 MARK E. FERRARIO, ESQ.

22 Nevada Bar No. 1625

23 KARA B. HENDRICKS, ESQ.

24 Nevada Bar No. 7743

25 ALAYNE M. OPIE, ESQ.

26 Nevada Bar No. 12623

27 10845 Griffith Peak Drive, Suite 600

28 Las Vegas, Nevada 89144

*Attorneys for WILLIAM L. LINDNER as Trustee of  
the William L. Lindner and Maxine G. Lindner Trust  
of 1988; JUEL A. PARKER, individually and as  
Trustee of the Juel A. Parker Family Trust; LISA  
PARKER, individually and as Trustee of the Juel A.  
Parker Family Trust; and S. BRUCE PARKER, as  
Trustee of the Steven Bruce Parker Family Trust*

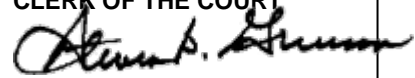
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The date and time of the electronic proof of service is in place of the date and place of deposit in the U.S. Mail.

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EXHIBIT “A”

EXHIBIT “A”



**ORDR**

MARK E. FERRARIO, ESQ.

Nevada Bar No. 1625

KARA B. HENDRICKS, ESQ.

Nevada Bar No. 7743

ALAYNE M. OPIE, ESQ.

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*Attorneys for WILLIAM L. LINDNER as Trustee of the William L. Lindner and Maxine G. Lindner Trust of 1988; JUEL A. PARKER, individually and as Trustee of the Juel A. Parker Family Trust; LISA PARKER, individually and as Trustee of the Juel A. Parker Family Trust; and S. BRUCE PARKER, as Trustee of the Steven Bruce Parker Family Trust*

**EIGHTH JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

BRAD L. KNOWLTON, an individual,

Plaintiff,

v.

VALLEY ASCENT, LLC, a Nevada limited liability company, WILLIAM L. LINDNER, as Trustee of the William L. Lindner and Maxine G. Lindner Trust of 1988, JUEL A. PARKER, as Trustee of the Juel A. Parker Family Trust, LISA PARKER, as Trustee of the Juel A. Parker Family Trust, LISA PARKER, an individual, and S. BRUCE PARKER, as Trustee of the Steven Bruce Parker Family Trust,

Defendants.

**CASE NO: A-20-809612-B**

**DEPT. XI**

**ORDER GRANTING DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT**

**Date of Hearing November 2, 2020  
Time: 9:00 am**

1 WILLIAM L. LINDNER, as Trustee of the William  
2 L. Lindner and Maxine G. Lindner Trust of 1988,  
3 individually and derivatively; LISA PARKER, as  
4 Trustee of the Juel A. Parker Family Trust,  
5 individually and derivatively; S. BRUCE PARKER,  
as Trustee of the Steven Bruce Parker Family Trust,  
individually and derivatively, and JUEL PARKER,  
individually,

6 Counter-Plaintiffs,

7 v.

8 BRAD L. KNOWLTON, individually and  
9 derivatively; and DOE Individuals I-X and ROE  
Entities I-X, inclusive,

10 Counter-Defendant,

11 and

12 Nominal party VALLEY ASCENT, LLC, a Nevada  
13 limited liability company.

14 On November 2, 2020, the Court heard oral argument on the Motion for Summary Judgment  
15 (“Motion”) filed by Defendants/Counterclaimants WILLIAM L. LINDNER, as Trustee of the  
16 William L. Lindner and Maxine G. Lindner Trust of 1988; JUEL A. PARKER, individually and as  
17 Trustee of the Juel A. Parker Family Trust; LISA PARKER, individually and as Trustee of the Juel  
18 A. Parker Family Trust; and S. BRUCE PARKER, as Trustee of the Steven Bruce Parker Family  
19 Trust (collectively “Defendants”). The Court, having considered the Motion, the Opposition to the  
20 Motion filed by Brad L. Knowlton, Defendants’ Reply in Support of the Motion, and all the  
21 arguments of counsel for all parties present at the hearing for this matter held on November 2, 2020,  
22 finds and orders as follows:

23 **FINDINGS OF FACT**

24 1. Defendants moved the Court for an order granting summary judgment on the claims  
25 asserted by Plaintiff Brad L. Knowlton (“Knowlton”) contending that Knowlton lacked standing to  
26 proceed on the claims pled in the Complaint.

27 ///

28 ///



2. Prior to June 19, 2020, Defendants and Mr. Knowlton had membership interests in Valley Ascent, LLC (“Valley Ascent”) as follows: Mr. Knowlton 38.55%; Juel Parker Trust 36.45%; Lindner Trust 20%; and S. Bruce Parker Trust 5%.

3. On or about June 27, 2017, Shondell Swenson filed for divorce against Brad L. Knowlton, said proceeding bearing Utah Civil Case No. 174701016.

4. After battling with highly-contentious divorce proceedings for nearly three years, the Court in Utah divided the marital assets and liabilities, and entered a Judgment and Decree of Divorce on June 5, 2020.

5. In connection therewith, Ms. Swenson was awarded all rights, title and interest to Mr. Knowlton’s 38.55% membership interest in Valley Ascent.

6. On or about June 19, 2020, Mr. Knowlton executed an Assignment of Membership Interest in Valley Ascent (“Assignment”).

7. Therein, Mr. Knowlton “transfer[ed] and assign[ed] his interest in Valley Ascent, LLC, a Nevada Limited Liability Company, to Shondell Swenson; and...permanently relinquish[ed], waiv[ed], and/or release[d] any and all rights, interests, and/or claims related to his ownership interest in Valley Ascent, LLC, all of which have been transferred to Shondell Swenson by virtue of this Assignment of Interest.”

8. Said Assignment was filed in this action on August 10, 2020.

9. By way of the Assignment, all of Mr. Knowlton’s claims pled in the instant action were transferred to Ms. Swenson.

10. If any finding of fact is properly a conclusion of law, it shall be treated as if it was appropriately identified and designated.

### **CONCLUSIONS OF LAW**

#### **A. STANDARD OF REVIEW.**

1. Summary judgment under Rule 56 is appropriate and “shall be rendered forthwith” when the pleadings and other evidence on file demonstrate that no “genuine issue as to any material fact [remains] and that the moving party is entitled to judgment as a matter of law.” *See* NRCp 56(c), *Tucker v. Action Equip. and Scaffold Co.*, 113 Nev. 1349, 1353, 951 P.2d 1027, 1029 (1997).

1 The Nevada Supreme Court has defined a *genuine issue* as “evidence such that a rational trier of  
2 fact could return a verdict for the nonmoving party.” *Id.* (citing *Matsushita Electric Industrial Co.*  
3 *v. Zenith Radio*, 475 U.S. 574, 586 (1986)). As to materiality, only disputes over facts that might  
4 affect the outcome of the suit under the governing law will preclude the entry of summary judgment.  
5 *Wood v. Safeway, Inc.*, 121 Nev. 724, 121 P.3d 1026, 1030 (2005). Factual disputes which are  
6 irrelevant or unnecessary will not be considered. *Id.* Summary judgment is appropriate if the  
7 nonmoving party fails to set forth facts demonstrating the existence of a genuine issue. *Bulbman,*  
8 *Inc. v. Nevada Bell*, 108 Nev. 105, 110, 825 P.2d 588, 592 (1992).

9         2.         Here, there are no issues of material or genuine fact that prevent granting summary  
10 judgment.

11 **B.         KNOWLTON LACKS STANDING TO PURSUE THE CLAIMS ASSERTED IN THE**  
12 **COMPLAINT.**

13         1.         Under Nevada law, an action must be commenced by the real party-in-interest – “one  
14 who possesses the right to enforce the claim and has a significant interest in the litigation.” *Szilagyi*  
15 *v. Testa*, 99 Nev. 834, 838, 673 P.2d 495, 498 (1983); *see* NRCP 17(a). Due to this limitation, a party  
16 generally has standing to assert only its own rights and cannot raise the claims of a third party not  
17 before the court. *See Deal v. 999 Lakeshore Association*, 94 Nev. 301, 304, 579 P.2d 775, 777 (1978).  
18 The burden of demonstrating the right to pursue a claim is properly placed upon the claimant.  
19 *Mortgage Elec. Reg. Sys. v. Chong*, 2009 U.S. Dist. LEXIS 127500 at \*6 (D. Nev. Dec. 4, 2009).

20         2.         Mr. Knowlton failed to demonstrate a right to pursue any of the claims asserted in the  
21 Complaint after transferring and assigning his interest in Valley Ascent to Ms. Swenson and  
22 permanently relinquishing, waiving, and/or releasing any and all rights, interests, and/or claims  
23 related to his ownership interest in Valley Ascent, as set forth in the Assignment.

24         3.         The Assignment resolves all currently pled claims because all are intricately  
25 intertwined with the ownership of Valley Ascent.

26         4.         Accordingly, Defendants are entitled to summary judgment in their favor on all of  
27 Mr. Knowlton’s claims, including (1) breach of contract, (2) breach of the implied covenant of good  
28 faith and fair dealing, (3) declaratory relief, (4) intentional interference with contractual relations,

(5) expulsion as a member, (6) breach of fiduciary duties, (7) receivership and (8) preliminary injunction.

**ORDER**

Based on the foregoing, and good cause appearing therefor:

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that Defendants/Counterclaimants' Motion for Summary Judgment is **GRANTED**.

**IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that judgment is rendered in Defendants/Counterclaimants' favor on all claims asserted in the Complaint, specifically, Mr. Knowlton's claims for (1) breach of contract, (2) breach of the implied covenant of good faith and fair dealing, (3) declaratory relief, (4) intentional interference with contractual relations, (5) expulsion as a member, (6) breach of fiduciary duties, (7) receivership and (8) preliminary injunction.

**IT IS SO ORDERED.**

DATED this 12th day of November, 2020.

  
DISTRICT COURT JUDGE

Respectfully Submitted by:

**GREENBURG TRAURIG, LLP**

/s/ Kara B. Hendricks  
MARK E. FERRARIO, ESQ.  
Nevada Bar No. 1625  
KARA B. HENDRICKS, ESQ.  
Nevada Bar No. 7743  
ALAYNE M. OPIE, ESQ.  
Nevada Bar No. 12623  
10845 Griffith Peak Drive, Suite 600  
Las Vegas, Nevada 89144

*Attorneys for Defendants/Counterclaimants*

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Approved as to form by:  
  
**SNOW, CHRISTENSEN & MARTINEAU**  
  
  
                  /s/ Steven W. Beckstrom                    
STEVEN W. BECKSTROM, ESQ.  
Nevada Bar No. 8372  
555 South Bluff Street, Suite 301  
St. George, Utah 84770  
and  
ANDREW D. SMITH, ESQ.  
Nevada Bar No. 8890  
**WINNER& SHERROD, LTD.**  
1117 South Rancho Drive  
Las Vegas, Nevada 89102  
  
*Attorneys for Plaintiff Brad L. Knowlton*

**From:** [Steven W. Beckstrom](#)  
**To:** [Hendricks, Kara \(Shld-LV-LT\)](#)  
**Subject:** Re: Knowlton v. Juel Order re: MSJ  
**Date:** Thursday, November 12, 2020 9:00:40 AM  
**Attachments:** [image001.png](#)

---

This looks fine. You may affix my electronic signature to the document and file it with the Court.

---

**From:** hendricksk@gtlaw.com <hendricksk@gtlaw.com>  
**Sent:** Thursday, November 12, 2020 9:53 AM  
**To:** Steven W. Beckstrom <SWB@scmlaw.com>  
**Cc:** flintza@gtlaw.com <flintza@gtlaw.com>  
**Subject:** RE: Knowlton v. Juel Order re: MSJ

Thank you Steven. We have accepted your revisions. I also found a typo in the last paragraph which has been corrected. (The change is highlighted in the attached.)

Please confirm we have authorization to submit to the court with your e-signature.

Best,  
Kara

**Kara Hendricks**  
Shareholder

T 702.938.6856

---

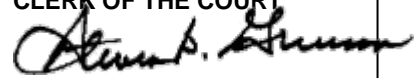
**From:** Steven W. Beckstrom <SWB@scmlaw.com>  
**Sent:** Monday, November 9, 2020 12:45 PM  
**To:** Hendricks, Kara (Shld-LV-LT) <hendricksk@gtlaw.com>  
**Subject:** Re: Knowlton v. Juel Order re: MSJ

**\*EXTERNAL TO GT\***

Kara- Attached are some revisions to the proposed orders that you prepared. My revisions are minor and are found in redline format. If these revisions are acceptable, please let me know. Thanks!

---

**From:** [hendricksk@gtlaw.com](#) <[hendricksk@gtlaw.com](#)>  
**Sent:** Thursday, November 5, 2020 2:18 PM  
**To:** Steven W. Beckstrom <[SWB@scmlaw.com](#)>  
**Subject:** Knowlton v. Juel Order re: MSJ



**ORDR**

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Nevada Bar No. 1625

KARA B. HENDRICKS, ESQ.

Nevada Bar No. 7743

ALAYNE M. OPIE, ESQ.

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*Attorneys for WILLIAM L. LINDNER as Trustee of the William L. Lindner and Maxine G. Lindner Trust of 1988; JUEL A. PARKER, individually and as Trustee of the Juel A. Parker Family Trust; LISA PARKER, individually and as Trustee of the Juel A. Parker Family Trust; and S. BRUCE PARKER, as Trustee of the Steven Bruce Parker Family Trust*

**EIGHTH JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

BRAD L. KNOWLTON, an individual,

Plaintiff,

v.

VALLEY ASCENT, LLC, a Nevada limited liability company, WILLIAM L. LINDNER, as Trustee of the William L. Lindner and Maxine G. Lindner Trust of 1988, JUEL A. PARKER, as Trustee of the Juel A. Parker Family Trust, LISA PARKER, as Trustee of the Juel A. Parker Family Trust, LISA PARKER, an individual, and S. BRUCE PARKER, as Trustee of the Steven Bruce Parker Family Trust,

Defendants.

**CASE NO: A-20-809612-B**

**DEPT. XI**

**ORDER GRANTING  
COUNTERCLAIMANTS' MOTION TO  
DISMISS COUNTERCLAIMS**

1 WILLIAM L. LINDNER, as Trustee of the William  
2 L. Lindner and Maxine G. Lindner Trust of 1988,  
3 individually and derivatively; LISA PARKER, as  
4 Trustee of the Juel A. Parker Family Trust,  
5 individually and derivatively; S. BRUCE PARKER,  
6 as Trustee of the Steven Bruce Parker Family Trust,  
7 individually and derivatively, and JUEL PARKER,  
8 individually,

Counter-Plaintiffs,

v.

BRAD L. KNOWLTON, individually and  
derivatively; and DOE Individuals I-X and ROE  
Entities I-X, inclusive,

Counter-Defendant,

and

Nominal party VALLEY ASCENT, LLC, a Nevada  
limited liability company.

Defendants/Counterclaimants WILLIAM L. LINDNER, as Trustee of the William L. Lindner  
and Maxine G. Lindner Trust of 1988; JUEL A. PARKER, individually and as Trustee of the Juel A.  
Parker Family Trust; LISA PARKER, individually and as Trustee of the Juel A. Parker Family Trust;  
and S. BRUCE PARKER, as Trustee of the Steven Bruce Parker Family Trust (collectively  
“Counterdefendants” or “Majority Members”) filed a Motion to Dismiss Counterclaims on February 5,  
2021 (“Motion”).

On February 19, 2021, Plaintiff Brad L. Knowlton (“Knowlton”) filed his Statement of Non-  
Opposition to Counterclaimants’ Motion to Dismiss Counterclaims.

The Court, having considered the Motion filed by the Majority Members and the Non-  
Opposition to the Motion filed by Brad L. Knowlton, and good cause existing therefore finds and  
orders as follows:

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that Counterclaimants’  
Motion to Dismiss Counterclaims is **GRANTED** and the counterclaims asserted by the Majority  
Members are dismissed with prejudice with each side to bear their own attorneys’ fees and costs.

///

Page 3




**From:** [Steven W. Beckstrom](#)  
**To:** [Hendricks, Kara \(Shld-LV-LT\)](#)  
**Subject:** RE: Order Granting Motion to Dismiss Counterclaims.DOCX  
**Date:** Wednesday, February 24, 2021 3:37:58 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

---

**\*EXTERNAL TO GT\***

Kara- This Order looks fine to me. You may file it with the Court with my electronic signature affixed.

Thanks,

 **Steven W. Beckstrom** | Lawyer  
555 South Bluff Street, #301 | St. George, Utah 84770  
Direct: [435.215.2309](tel:435.215.2309) | Main: [435.673.8288](tel:435.673.8288) | [www.scmlaw.com](http://www.scmlaw.com)

---

**From:** hendricksk@gtlaw.com <hendricksk@gtlaw.com>  
**Sent:** Monday, February 22, 2021 3:22 PM  
**To:** Steven W. Beckstrom <SWB@scmlaw.com>  
**Subject:** Order Granting Motion to Dismiss Counterclaims.DOCX

Steven,

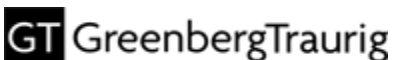
Attached is a draft order relating to the motion to dismiss counterclaims. Given that a non-opposition was filed, I would like to submit this (with your consent and e-signature) to the court and request that the hearing be vacated.

Please let us know if you approve.

Kara

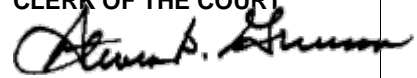
**Kara Hendricks**  
Shareholder

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T +1 702.938.6856  
[hendricksk@gtlaw.com](mailto:hendricksk@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)



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1 **NEO**  
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4 KARA B. HENDRICKS, ESQ.  
5 Nevada Bar No. 7743  
6 ALAYNE M. OPIE, ESQ.  
7 Nevada Bar No. 12623  
8 **GREENBERG TRAUIG, LLP**  
9 10845 Griffith Peak Drive, Suite 600  
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14 [hendricksk@gtlaw.com](mailto:hendricksk@gtlaw.com)  
15 [opiea@gtlaw.com](mailto:opiea@gtlaw.com)

16 *Attorneys for WILLIAM L. LINDNER as Trustee of*  
17 *the William L. Lindner and Maxine G. Lindner*  
18 *Trust of 1988; JUEL A. PARKER, individually and*  
19 *as Trustee of the Juel A. Parker Family Trust; LISA*  
20 *PARKER, individually and as Trustee of the Juel A.*  
21 *Parker Family Trust; and S. BRUCE PARKER, as*  
22 *Trustee of the Steven Bruce Parker Family Trust*

23 **EIGHTH JUDICIAL DISTRICT COURT**

24 **CLARK COUNTY, NEVADA**

25 BRAD L. KNOWLTON, an individual,  
26  
27 Plaintiff,

28 v.

29 VALLEY ASCENT, LLC, a Nevada limited liability  
30 company, WILLIAM L. LINDNER, as Trustee of  
31 the William L. Lindner and Maxine G. Lindner Trust  
32 of 1988, JUEL A. PARKER, as Trustee of the Juel  
33 A. Parker Family Trust, LISA PARKER, as Trustee  
34 of the Juel A. Parker Family Trust, LISA PARKER,  
35 an individual, and S. BRUCE PARKER, as Trustee  
36 of the Steven Bruce Parker Family Trust,

37 Defendants.

38 WILLIAM L. LINDNER, as Trustee of the William  
39 L. Lindner and Maxine G. Lindner Trust of 1988,  
40 indiviudally and derivatively; LISA PARKER, as  
41 Trustee of the Juel A. Parker Family Trust,  
42 indiviudally and derivatively; S. BRUCE PARKER,  
43 as Trustee of the Steven Bruce Parker Family Trust,

CASE NO: A-20-809612-B

DEPT. XI

NOTICE OF ENTRY OF ORDER

1 indiviudally and derivatively, and JUEL PARKER,  
2 individually,

3  
4 Counter-Plaintiffs

5 v.

6 BRAD L. KNOWLTON, individually and  
7 derivatively; and DOE Individuals I-X and ROE  
8 Entities I-X, inclusive,

9 Counter-Defendant,

10 and

11 Nominal party VALLEY ASCENT, LLC, a Nevada  
12 limited liability company.

13 TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

14 YOU, AND EACH OF YOU, will please take notice that, on February 25, 2021, the Court  
15 entered an Order Granting Counterclaimants' Motion to Dismiss Counterclaims, a copy of which is  
16 attached hereto as Exhibit "A."

17 DATED this 25<sup>th</sup> day of February, 2021.

18 **GREENBURG TRAURIG, LLP**

19 /s/ Kara B. Hendricks

20 MARK E. FERRARIO, ESQ.

21 Nevada Bar No. 1625

22 KARA B. HENDRICKS, ESQ.

23 Nevada Bar No. 7743

24 ALAYNE M. OPIE, ESQ.

25 Nevada Bar No. 12623

26 10845 Griffith Peak Drive, Suite 600

27 Las Vegas, Nevada 89144

28 *Attorneys for WILLIAM L. LINDNER as Trustee of  
the William L. Lindner and Maxine G. Lindner Trust  
of 1988; JUEL A. PARKER, individually and as  
Trustee of the Juel A. Parker Family Trust; LISA  
PARKER, individually and as Trustee of the Juel A.  
Parker Family Trust; and S. BRUCE PARKER, as  
Trustee of the Steven Bruce Parker Family Trust*

1 **CERTIFICATE OF SERVICE**

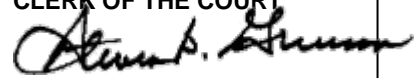
2 I hereby certify that on this 25<sup>th</sup> day of February, 2021, a true and correct copy of the foregoing  
3 **NOTICE OF ENTRY OF ORDER** was served by electronically filing with the Clerk of the Court  
4 using the Odyssey eFileNV Electronic Filing system and serving all parties with an email address on  
5 record, pursuant to Administrative Order 14-2 and Rule 9 of the N.E.F.C.R.

6 The date and time of the electronic proof of service is in place of the date and place of deposit  
7 in the U.S. Mail.

8  
9 /s/ Andrea Flintz  
10 An employee of Greenberg Traurig, LLP  
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EXHIBIT “A”

EXHIBIT “A”



**ORDR**

MARK E. FERRARIO, ESQ.

Nevada Bar No. 1625

KARA B. HENDRICKS, ESQ.

Nevada Bar No. 7743

ALAYNE M. OPIE, ESQ.

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[hendricksk@gtlaw.com](mailto:hendricksk@gtlaw.com)

[opiea@gtlaw.com](mailto:opiea@gtlaw.com)

*Attorneys for WILLIAM L. LINDNER as Trustee of the William L. Lindner and Maxine G. Lindner Trust of 1988; JUEL A. PARKER, individually and as Trustee of the Juel A. Parker Family Trust; LISA PARKER, individually and as Trustee of the Juel A. Parker Family Trust; and S. BRUCE PARKER, as Trustee of the Steven Bruce Parker Family Trust*

**EIGHTH JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

BRAD L. KNOWLTON, an individual,

Plaintiff,

v.

VALLEY ASCENT, LLC, a Nevada limited liability company, WILLIAM L. LINDNER, as Trustee of the William L. Lindner and Maxine G. Lindner Trust of 1988, JUEL A. PARKER, as Trustee of the Juel A. Parker Family Trust, LISA PARKER, as Trustee of the Juel A. Parker Family Trust, LISA PARKER, an individual, and S. BRUCE PARKER, as Trustee of the Steven Bruce Parker Family Trust,

Defendants.

**CASE NO: A-20-809612-B**

**DEPT. XI**

**ORDER GRANTING  
COUNTERCLAIMANTS' MOTION TO  
DISMISS COUNTERCLAIMS**

1 WILLIAM L. LINDNER, as Trustee of the William  
2 L. Lindner and Maxine G. Lindner Trust of 1988,  
3 individually and derivatively; LISA PARKER, as  
4 Trustee of the Juel A. Parker Family Trust,  
5 individually and derivatively; S. BRUCE PARKER,  
as Trustee of the Steven Bruce Parker Family Trust,  
individually and derivatively, and JUEL PARKER,  
individually,

6 Counter-Plaintiffs,

7 v.

8 BRAD L. KNOWLTON, individually and  
9 derivatively; and DOE Individuals I-X and ROE  
Entities I-X, inclusive,

10 Counter-Defendant,

11 and

12 Nominal party VALLEY ASCENT, LLC, a Nevada  
13 limited liability company.

14 Defendants/Counterclaimants WILLIAM L. LINDNER, as Trustee of the William L. Lindner  
15 and Maxine G. Lindner Trust of 1988; JUEL A. PARKER, individually and as Trustee of the Juel A.  
16 Parker Family Trust; LISA PARKER, individually and as Trustee of the Juel A. Parker Family Trust;  
17 and S. BRUCE PARKER, as Trustee of the Steven Bruce Parker Family Trust (collectively  
18 “Counterdefendants” or “Majority Members”) filed a Motion to Dismiss Counterclaims on February 5,  
19 2021 (“Motion”).

20 On February 19, 2021, Plaintiff Brad L. Knowlton (“Knowlton”) filed his Statement of Non-  
21 Opposition to Counterclaimants’ Motion to Dismiss Counterclaims.

22 The Court, having considered the Motion filed by the Majority Members and the Non-  
23 Opposition to the Motion filed by Brad L. Knowlton, and good cause existing therefore finds and  
24 orders as follows:

25 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that Counterclaimants’  
26 Motion to Dismiss Counterclaims is **GRANTED** and the counterclaims asserted by the Majority  
27 Members are dismissed with prejudice with each side to bear their own attorneys’ fees and costs.

28 ///

**IT IS SO ORDERED.**

EWING  
DISTRICT COURT JUDGE

**GREENBURG TRAURIG, LLP**

SNOW, CHRISTENSEN &amp; MARTINEAU

Page 3



**From:** [Steven W. Beckstrom](#)  
**To:** [Hendricks, Kara \(Shld-LV-LT\)](#)  
**Subject:** RE: Order Granting Motion to Dismiss Counterclaims.DOCX  
**Date:** Wednesday, February 24, 2021 3:37:58 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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**\*EXTERNAL TO GT\***

Kara- This Order looks fine to me. You may file it with the Court with my electronic signature affixed.

Thanks,



**Steven W. Beckstrom** | Lawyer  
555 South Bluff Street, #301 | St. George, Utah 84770  
Direct: [435.215.2309](tel:435.215.2309) | Main: [435.673.8288](tel:435.673.8288) | [www.scmlaw.com](http://www.scmlaw.com)

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**From:** hendricksk@gtlaw.com <hendricksk@gtlaw.com>  
**Sent:** Monday, February 22, 2021 3:22 PM  
**To:** Steven W. Beckstrom <SWB@scmlaw.com>  
**Subject:** Order Granting Motion to Dismiss Counterclaims.DOCX

Steven,

Attached is a draft order relating to the motion to dismiss counterclaims. Given that a non-opposition was filed, I would like to submit this (with your consent and e-signature) to the court and request that the hearing be vacated.

Please let us know if you approve.

Kara

**Kara Hendricks**  
Shareholder

Greenberg Traurig, LLP  
10845 Griffith Peak Drive | Suite 600 | Las Vegas, NV 89135  
T +1 702.938.6856  
[hendricksk@gtlaw.com](mailto:hendricksk@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com) | [View GT Biography](#)



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**DISTRICT COURT  
CLARK COUNTY, NEVADA**

## NRS Chapters 78-89

# COURT MINUTES

**March 09, 2020**

A-20-809612-B      Brad Knowlton, Plaintiff(s)  
vs.  
William L Lindner and Maxine G Lindner Trust of 1988, Defendant(s)

March 09, 2020	9:00 AM	Motion for Preliminary Injunction
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**HEARD BY:** Gonzalez, Elizabeth                      **COURTROOM:** RJC Courtroom 03E

**COURT CLERK:** Dulce Romea

**RECORDER:** Jill Hawkins

**REPORTER:**

## PARTIES

<b>PRESENT:</b>	Beckstrom, Steven W.	Attorney
	Ferrario, Mark E., ESQ	Attorney
	Hendricks, Kara B.	Attorney
	Knowlton, Brad L.	Plaintiff
	Parker, Lisa	Defendant
	Smith, Andrew D.	Attorney

## JOURNAL ENTRIES

- Following arguments by Mr. Beckstrom and Mr. Ferrario, COURT ORDERED, injunctive relief will be DENIED at this point; there has been a facial showing of financial misconduct by the management fee that was taken and the failure to provide books and records as requested by the other members. At this time the Court will NOT CONFIRM Ms. Lisa Parker as interim manager and will APPOINT Brian Gordon who has previously been used by the company to act as the interim manager. The Court will not permit him at any time to testify as an expert for either side; he will manage the ongoing daily operations and respond to document requests by the members.

Counsel for Defendants to prepare the order.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**NRS Chapters 78-89**

**COURT MINUTES**

**March 31, 2020**

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A-20-809612-B	Brad Knowlton, Plaintiff(s) vs. William L Lindner and Maxine G Lindner Trust of 1988, Defendant(s)
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**March 31, 2020      8:32 AM      Minute Order**

**HEARD BY:** Gonzalez, Elizabeth      **COURTROOM:** Chambers

**COURT CLERK:** Dulce Romea

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- COURT ORDERED, pursuant to Administrative Order 20-01 the time requirements of NRCP 16(b)(2) are SUSPENDED, and the requirement of filing a Joint Case Conference Report is SUSPENDED.

CLERK'S NOTE: A copy of this minute order was provided to Odyssey File and Serve. / dr 3-31-20

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**NRS Chapters 78-89**

**COURT MINUTES**

**April 03, 2020**

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A-20-809612-B	Brad Knowlton, Plaintiff(s) vs. William L Lindner and Maxine G Lindner Trust of 1988, Defendant(s)
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<b>April 03, 2020</b>	<b>9:01 AM</b>	<b>Motion to Seal/Redact Records</b>
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**HEARD BY:** Gonzalez, Elizabeth                      **COURTROOM:** Chambers

**COURT CLERK:** Dulce Romea

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- COURT ORDERED, the ex parte motion to seal the complaint and motion for preliminary injunction filed March 19, 2020 is DENIED. The Court has reviewed the "Redacted" versions which contain only one redaction. Plaintiff may within 10 days provide proposed redactions in addition to the one social security number that has been redacted. Matter CONTINUED to April 17, 2020 in chambers.

4-17-20      CHAMBERS      EX PARTE MOTION TO SEAL, REDACT OR DEEM PROTECTED  
(1) COMPLAINT, AND (2) MOTION FOR PRELIMINARY INJUNCTION

CLERK'S NOTE: A copy of this minute order was distributed via Odyssey File and Serve. / dr 4-3-20

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**NRS Chapters 78-89**

**COURT MINUTES**

**April 17, 2020**

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A-20-809612-B	Brad Knowlton, Plaintiff(s) vs. William L Lindner and Maxine G Lindner Trust of 1988, Defendant(s)
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<b>April 17, 2020</b>	<b>3:00 AM</b>	<b>Motion to Seal/Redact Records</b>
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**HEARD BY:** Gonzalez, Elizabeth

**COURTROOM:** Chambers

**COURT CLERK:** Dulce Romea

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- COURT NOTED no supplement to redactions provided, ORDERED, matter CONTINUED for 2 weeks.

...5-1-20 - CHAMBERS

CLERK'S NOTE: A copy of this minute order was distributed via Odyssey File and Serve. / dr 4-20-20

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**NRS Chapters 78-89**

**COURT MINUTES**

**May 01, 2020**

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A-20-809612-B	Brad Knowlton, Plaintiff(s) vs. William L Lindner and Maxine G Lindner Trust of 1988, Defendant(s)
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May 01, 2020	3:00 AM	Motion to Seal/Redact Records
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**HEARD BY:** Gonzalez, Elizabeth                      **COURTROOM:** Chambers

**COURT CLERK:** Dulce Romea

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- COURT ORDERED, given the notice of submission of redacted versions, matter OFF CALENDAR.

CLERK'S NOTE: A copy of this minute order was distributed via Odyssey File and Serve. / dr 5-4-20

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

## NRS Chapters 78-89

# COURT MINUTES

**June 22, 2020**

A-20-809612-B      Brad Knowlton, Plaintiff(s)  
vs.  
William L Lindner and Maxine G Lindner Trust of 1988, Defendant(s)

**June 22, 2020                      9:00 AM                      Mandatory Rule 16  
Conference**

**HEARD BY:** Gonzalez, Elizabeth

**COURTROOM:** RJC Courtroom 03E

**COURT CLERK:** Dulce Romea

**RECORDER:** Jill Hawkins

**REPORTER:**

## PARTIES

**PRESENT:** Beckstrom, Steven W. Attorney  
 Ferrario, Mark E., ESQ Attorney  
 Hendricks, Kara B. Attorney

## JOURNAL ENTRIES

- All parties appeared by telephone.

Ms. Hendricks advised, noting no offense meant to Mr. Beckstrom, that his client has ownership over 30% of the interest in the LLC lost as part of the divorce proceeding, so his ex-wife will now be a controlling member; this case is ripe for a settlement conference before they spend additional time and money on discovery. Mr. Beckstrom responded that while he does not necessarily agree with the claims going away in light of the divorce, he does agree with the case being ripe for a settlement conference. Parties advised they have not yet done their initial disclosures.

Per the parties' request, matter REFERRED to Judge Williams for a settlement conference on Friday, August 14, 2020.

COURT ORDERED as follows:

Initial disclosures pursuant to rule 16.1 to be exchanged in 2 weeks;

Motions to amend pleadings or add parties TO BE FILED by August 7, 2020;

Initial expert disclosures where a party bears the burden of proof DUE by November 20, 2020;

Rebuttal expert disclosures where a party does not bear the burden of proof DUE by January 29, 2021;

Discovery cut-off SET for March 22, 2021;

Dispositive motions and motions in limine TO BE FILED by May 7, 2021;

Matter SET for trial on the stack beginning on June 28, 2021. Jury DEMANDED. Trial Setting Order will ISSUE.

Parties advised they do not need an ESI Protocol or Stipulated Protective Order and that they do not have any issues with the Rule on 10 depositions per side, not including custodians of records, and the 7-hour limit per deposition.

COURT ORDERED, today is the parties' joint case conference and the filing of the joint case conference report (JCCR) is WAIVED.

8-14-20      9:30 AM      SETTLEMENT CONFERENCE      (DEPT XVI - Williams)



**DISTRICT COURT  
CLARK COUNTY, NEVADA****NRS Chapters 78-89****COURT MINUTES****August 11, 2020**

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A-20-809612-B      Brad Knowlton, Plaintiff(s)  
vs.  
William L Lindner and Maxine G Lindner Trust of 1988, Defendant(s)

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**August 11, 2020      9:00 AM      Status Check**

**HEARD BY:** Williams, Timothy C.      **COURTROOM:** RJC Courtroom 03H

**COURT CLERK:** Christopher Darling

**RECORDER:**

**REPORTER:**

**PARTIES**

**PRESENT:**      Beckstrom, Steven W.      Attorney  
Hendricks, Kara B.      Attorney

**JOURNAL ENTRIES**

- Colloquy regarding nature of dispute, ongoing settlement discussions, and manner that 8/14/20 settlement conference to proceed. Upon Court's inquiry, Mr. Beckstrom advised his side intends to proceed remotely for the conference; Ms. Hendricks advised counsel and client representative with her intend to appear in-person. COURT ORDERED, will require all appearances and discussions be remote in light of current health environment as discussed. COURT FURTHER ORDERED, settlement briefs DUE Thursday, August 13, 2020 by 10:00 a.m.; submissions to be made by email to Dept16LC@clarkcountycourts.us. Colloquy regarding coordinating remote appearances. Court directed parties coordinate with Courtroom Clerk prior to the conference to establish their connection and use of private sessions. Courtroom Clerk advised will initiate communication with counsel in that regard.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**NRS Chapters 78-89**

**COURT MINUTES**

**August 14, 2020**

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A-20-809612-B      Brad Knowlton, Plaintiff(s)  
vs.  
William L Lindner and Maxine G Lindner Trust of 1988, Defendant(s)

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**August 14, 2020      9:30 AM      Settlement Conference**

**HEARD BY:** Williams, Timothy C.      **COURTROOM:** RJC Courtroom 03H

**COURT CLERK:** Christopher Darling

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- The above-referenced matter came on for a settlement conference with Judge Williams on August 14, 2020. The Plaintiff, Brad Knowlton, was present and represented by Steven Beckstrom, Esq. The Defendants Lisa Parker, Bruce Parker, and William Linder, were present and represented by Kara Hendricks, Esq. and Mark Ferrario, Esq. Unfortunately, the parties were unable to resolve their differences and the case did not settle. The case is now referred back to the originating department for further handling.



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**NRS Chapters 78-89**

**COURT MINUTES**

**March 08, 2021**

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A-20-809612-B	Brad Knowlton, Plaintiff(s) vs. William L Lindner and Maxine G Lindner Trust of 1988, Defendant(s)
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<b>March 08, 2021</b>	<b>9:00 AM</b>	<b>Motion to Dismiss</b>
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<b>HEARD BY:</b> Gonzalez, Elizabeth	<b>COURTROOM:</b> RJC Courtroom 03E
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**COURT CLERK:** Dulce Romea

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- Pursuant to Administrative Order 21-01, the Court decides this matter without the necessity of oral argument. The Court, having reviewed Counterclaimants' Motion to Dismiss their Counterclaims and the related briefing and being fully informed, GRANTS the motion. Counsel for Counterclaimant is directed to submit a proposed order approved by opposing counsel consistent with the foregoing within ten (10) days and distribute a filed copy to all parties involved in this matter. Such order should set forth a synopsis of the supporting reasons proffered to the Court in briefing. This Decision sets forth the Court's intended disposition on the subject but anticipates further order of the Court to make such disposition effective as an order.

CLERK'S NOTE: A copy of this minute order was distributed via Odyssey File and Serve. / dr 3-8-21

# 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 DEFENDANTS' MOTION FOR SUMMARY JUDGMENT; NOTICE OF ENTRY OF ORDER; ORDER GRANTING COUNTERCLAIMANTS' MOTION TO DISMISS COUNTERCLAIMS; NOTICE OF ENTRY OF ORDER; DISTRICT COURT MINUTES

BRAD L. KNOWLTON,

Plaintiff(s),

vs.

VALLEY ASCENT, LLC; WILLIAM L. LINDNER, as Trustee of the WILLIAM L. LINDNER AND MAZINE G. LINDNER TRUST OF 1988; JUEL A. PARKER, as Trustee of the JUEL A. PARKER FAMILY TRUST; LISA PARKER, as Trustee of the JUEL A. PARKER FAMILY TRUST; LISA PARKER, an Individual; S. BRUCE PARKER, as Trustee of the STEVEN BRUCE PARKER FAMILY TRUST,

Defendant(s),

Case No: A-20-809612-B

Dept No: XI

now on file and of record in this office.

**IN WITNESS THEREOF**, I have hereunto Set my hand and Affixed the seal of the Court at my office, Las Vegas, Nevada This 29 day of March 2021.

Steven D. Grierson, Clerk of the Court



Heather Ungermann, Deputy Clerk

81369

**ERICKSON & WHITAKER PC**

1349 Galleria DR Ste 200  
Henderson, NV 89014-8624  
(702) 433-9696

**NEVADA STATE BANK**

P.O. Box 990, Las Vegas, NV 89125

94-77/1224

3/25/2021

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ORDER OF

Supreme Court of Nevada

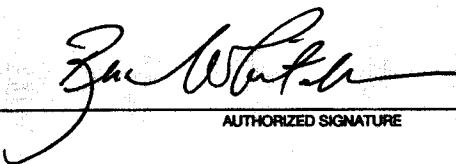
\$ \*\*250.00

Two Hundred Fifty and 00/100

DOLLARS

MEMO A-20-809612-B

Knowlton v. Valley Ascent & Lindner

  
AUTHORIZED SIGNATURE

⑈00081369⑈ ⑆122400779⑆ 982678120⑈

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