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Attorneys for Complete Care Consulting, LLC

Electronically Filed  
May 12 2021 09:22 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF WASHOE

COMPLETE CARE CONSULTING, LLC,

Case No. CV20-02009

Petitioner,

Dpt. 6

vs.

SHANNON M. CHAMBERS, in her capacity  
as the Labor Commissioner of the State of  
Nevada; and the STATE OF NEVADA,  
OFFICE OF THE LABOR COMMISSIONER,

Respondents/Defendants.

**NOTICE OF APPEAL**

Petitioner appeals from the order of the Court filed April 12, 2021, written notice of entry  
of which was served on April 13, 2021.

I certify this document does not have the SSN of any person.

Dated May 5, 2021

\_\_\_\_/s/Jeffrey A. Dickerson\_\_\_\_

JEFFREY A. DICKERSON

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Dated May 5, 2021

JEFFREY A. DICKERSON

**AFFIRMATION**

I affirm this document does **NOT** contain the Social Security Number of any person.

Dated May , 2021

\_\_\_/s/Jeffrey A. Dickerson\_\_\_

JEFFREY A. DICKERSON

Code 4132

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
IN AND FOR THE COUNTY OF WASHOE

**COMPLETE CARE CONSULTING, LLC,**

**Case No. CV20-02009**

**Petitioner,**

**Dept. No. 6**

**vs.**

**SHANNON M. CHAMBERS, in her capacity as the  
Labor Commissioner of the State of Nevada and the  
STATE OF NEVADA, OFFICE OF THE LABOR  
COMMISSIONER,**

**Respondents.**

---

**NOTICE OF APPEAL DEFICIENCY**

TO: Clerk of the Court, Nevada Supreme Court,  
and All Parties or their Respective Counsel Of Record:

On May 5<sup>th</sup>, 2021, Attorney Jeffrey A. Dickerson, Esq. for Complete Care Consulting, LLC, filed a Notice of Appeal with the Court. The Notice of Appeal did not include a Case Appeal Statement pursuant to NRAP (3)(f)(1).

Pursuant to NRAP 3(a)(3), on May 7<sup>th</sup>, 2021, the Notice of Appeal was filed with the Nevada Supreme Court. By copy of this notice, Attorney Dickerson will be notified electronically of the deficiency.

Dated this 7th day of May, 2021.

Alicia Lerud, Interim  
Clerk of the Court  
By: /s/YViloria  
YViloria  
Deputy Clerk

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CERTIFICATE OF SERVICE

CASE NO. CV20-02009

I certify that I am an employee of the Second Judicial District Court of the State of Nevada, County of Washoe; that on the 7th day of May, 2021, I electronically filed the Notice of Appeal Deficiency with the Clerk of the Court by using the ECF system.

I further certify that I transmitted a true and correct copy of the foregoing document by the method(s) noted below:

Electronically filed with the Clerk of the Court by using the ECF system which will send a notice of electronic filing to the following:

BRIAN MORRIS, ESQ. for COMPLETE CARE CONSULTING, LLC

ANDREA NICHOLS, ESQ. for SHANNON M. CHAMBERS et al

JEFFREY DICKERSON, ESQ. for COMPLETE CARE CONSULTING, LLC

Deposited in the Washoe County mailing system for postage and mailing with the United States Postal Service in Reno, Nevada: (none)

/s/YViloria  
YViloria  
Deputy Clerk

SECOND JUDICIAL DISTRICT COURT  
COUNTY OF WASHOE

Case History - CV20-02009

DEPT. D6

HON. LYNNE K. SIMONS

Report Date & Time

5/7/2021

11:36:16AM

Case ID:	CV20-02009	Case Description:	COMPLETE CARE CONS. VS SHANNON CHAMBERS ETAL (D6)
Case Type:	OTHER JUDICIAL REVIEW/APPEAL	Initial Filing Date:	12/14/2020

Parties

ATTY	Jeffrey A. Dickerson, Esq. - 2690
RESP	SHANNON M. CHAMBERS - @1365611
PETR	COMPLETE CARE CONSULTING, LLC - @1365612
RESP	STATE OF NEVADA, OFFICE OF THE LABOR COMMISSIONER - (
ATTY	Brian R. Morris, Esq. - 5431
AG	Andrea Nichols, Esq. - 6436

Charges

Charge No.	Charge Code	Charge Date	Charge Description
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Plea Information

Charge No.	Plea Code	Plea Date	Plea Description
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Release Information

Custody Status

Hearings

Department	Event Description	Sched. Date & Time	Disposed Date
1 D6	Tickle Start Code	1/4/2021 07:00:00	1/5/2021

Event Extra Text: JUDGE RESPONDED TO 12/17 EMAIL?

Disposition:  
T200 1/5/2021

Department	Event Description	Sched. Date & Time	Disposed Date
2 D6	Request for Submission	3/3/2021 15:18:00	4/12/2021

Event Extra Text: MOTION TO DISMISS FOR FAILURE TO EXHAUST  
ADMINISTRATIVE REMEDIES - PROPOSED ORDER IN FOLDER NO 12 -  
BINDER BUILT

Disposition:  
S200 4/12/2021  
order

Department	Event Description	Sched. Date & Time	Disposed Date
3 D6	Tickle Start Code	3/8/2021 07:00:00	3/8/2021

Event Extra Text: STATUS OF ROA?

Disposition:  
T200 3/8/2021

Agency Cross Reference

Code	Agency Description	Case Reference I.D.
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**Case Description: COMPLETE CARE CONS. VS SHANNON CHAMBERS ETAL (D6)****Case ID: CV20-02009****Case Type: OTHER JUDICIAL REVIEW/APPEAL****Initial Filing Date:****12/14/2020**

		Actions	
Action Entry Date	Code	Code Description	Text
12/14/2020	\$3550	\$Pet for Judicial Review	PETITION FOR JUDICIAL REVIEW AND REQUEST FOR TRIAL DE NOVO - Transaction 8204089 - Approved By: CSULEZIC : 01-22-2021:08:51:53
12/15/2020	PAYRC	**Payment Received	A Payment of \$255.00 was made on receipt DCDC667015.
1/5/2021	T200	Tickle End Code	
1/22/2021	JST	**Short Trial Program Deposit	Transaction 8258662 - Approved By: CSULEZIC : 01-22-2021:08:51:53
1/22/2021	PAYRC	**Payment Received	A Payment of \$160.00 was made on receipt DCDC668591.
1/22/2021	3865	Request Trial De Novo/Arb	Transaction 8258662 - Approved By: CSULEZIC : 01-22-2021:08:51:53
1/22/2021	NEF	Proof of Electronic Service	Transaction 8258738 - Approved By: NOREVIEW : 01-22-2021:08:52:56
1/22/2021	4090	** Summons Issued	Transaction 8258651 - Approved By: CSULEZIC : 01-22-2021:08:35:31
1/22/2021	NEF	Proof of Electronic Service	Transaction 8258699 - Approved By: NOREVIEW : 01-22-2021:08:36:24
1/27/2021	2880	Ord for Briefing Schedule	Transaction 8264753 - Approved By: NOREVIEW : 01-27-2021:08:08:43
1/27/2021	NEF	Proof of Electronic Service	Transaction 8264754 - Approved By: NOREVIEW : 01-27-2021:08:09:43
1/27/2021	NEF	Proof of Electronic Service	Transaction 8265717 - Approved By: NOREVIEW : 01-27-2021:13:31:32
1/27/2021	3960	Statement Intent Participate	STATEMENT OF INTENT TO PARTICIPATE - Transaction 8265603 - Approved By: YVILORIA : 01-27-2021:13:31:32
1/27/2021	NEF	Proof of Electronic Service	Transaction 8265616 - Approved By: NOREVIEW : 01-27-2021:12:50:46
1/27/2021	1520	Declaration	DECLARATION OF SERVICE - KAREN RUTLEDGE OBO STATE OF NV OFFICE OF THE LABOR COMMISSIONER - Transaction 8265616 - Approved By: NOREVIEW : 01-27-2021:12:50:46
1/27/2021	1520	Declaration	DECLARATION OF SERVICE - ROSILAND MCCLOUD, ADMIN., ASST. OBO SHANNON M. CHAMBERS 1-25
1/27/2021	NEF	Proof of Electronic Service	Transaction 8265613 - Approved By: NOREVIEW : 01-27-2021:12:49:56
2/9/2021	2315	Mtn to Dismiss ...	MOTION TO DISMISS FOR FAILURE TO EXHAUST ADMINISTRATIVE REMEDIES (PJR) - Transaction 8286715 - Approved By: NOREVIEW : 02-09-2021:12:24:36
2/9/2021	NEF	Proof of Electronic Service	Transaction 8286715 - Approved By: NOREVIEW : 02-09-2021:12:24:36
2/9/2021	3960	Statement Intent Participate	(Notice) Statement of Intent to Participate - Transaction 8286682 - Approved By: CSULEZIC : 02-09-2021:12:23:36
2/9/2021	NEF	Proof of Electronic Service	Transaction 8286972 - Approved By: NOREVIEW : 02-09-2021:13:38:34
2/12/2021	2520	Notice of Appearance	JEFFREY DICKERSON ESQ - Transaction 8294401 - Approved By: CSULEZIC : 02-12-2021:15:53:00
2/12/2021	NEF	Proof of Electronic Service	Transaction 8294428 - Approved By: NOREVIEW : 02-12-2021:15:54:34
2/23/2021	2645	Opposition to Mtn ...	OPPOSITION TO: MOTION TO DISMISS FOR FAILURE TO EXHAUST ADMINISTRATIVE REMEDIES - Transaction 8309679 - Approved By: NOREVIEW : 02-24-2021:08:11:15
2/24/2021	NEF	Proof of Electronic Service	Transaction 8309679 - Approved By: NOREVIEW : 02-24-2021:08:11:15
3/3/2021	3860	Request for Submission	Request for Submission of Motion to Dismiss for Failure to Exhaust Administrative Remedies - Transaction 8323153 - Approved By: NOREVIEW : 03-03-2021:12:03:39
3/3/2021	NEF	Proof of Electronic Service	Transaction 8323153 - Approved By: NOREVIEW : 03-03-2021:12:03:39
3/3/2021	3790	Reply to/in Opposition	REPLY TO OPPOSITION TO MOTION TO DISMISS FOR FAILURE TO EXHAUST ADMINISTRATIVE REMEDIES - Transaction 8323896 - Approved By: NOREVIEW : 03-03-2021:15:22:56
3/3/2021	NEF	Proof of Electronic Service	Transaction 8323896 - Approved By: NOREVIEW : 03-03-2021:15:22:56
3/8/2021	T200	Tickle End Code	
4/12/2021	3060	Ord Granting Mtn ...	TO DISMISS - Transaction 8389192 - Approved By: NOREVIEW : 04-12-2021:09:04:59
4/12/2021	S200	Request for Submission Completed	order
4/12/2021	NEF	Proof of Electronic Service	Transaction 8389199 - Approved By: NOREVIEW : 04-12-2021:09:05:53
4/12/2021	F135	Adj Motion to Dismiss by DEFT	
4/13/2021	2540	Notice of Entry of Ord	NOE of Order Granting Motion to Dismiss - Transaction 8393392 - Approved By: NOREVIEW : 04-13-2021:16:40:53
4/13/2021	NEF	Proof of Electronic Service	Transaction 8393394 - Approved By: NOREVIEW : 04-13-2021:16:40:53

Case Description: COMPLETE CARE CONS. VS SHANNON CHAMBERS ETAL (D6)				
Case ID:	CV20-02009	Case Type:	OTHER JUDICIAL REVIEW/APPEAL	Initial Filing Date: 12/14/2020
5/5/2021	\$2515	\$Notice/Appeal Supreme Court	Transaction 8429586 - Approved By: YVILORIA : 05-05-2021:14:54:41	
5/5/2021	PAYRC	**Payment Received	A Payment of \$24.00 was made on receipt DCDC673627.	
5/5/2021	NEF	Proof of Electronic Service	Transaction 8429603 - Approved By: NOREVIEW : 05-05-2021:14:55:52	
5/5/2021	SAB	**Supreme Court Appeal Bond	COMPLETE CARE CONSULTING LLC - Transaction 8430251 - Approved By: YVILORIA : 05-06-2021:08:03:30	
5/6/2021	PAYRC	**Payment Received	A Payment of \$500.00 was made on receipt DCDC673637.	
5/6/2021	NEF	Proof of Electronic Service	Transaction 8430436 - Approved By: NOREVIEW : 05-06-2021:08:04:26	
5/7/2021	4113	District Ct Deficiency Notice	NOTICE OF APPEAL DEFICIENCY - SUPREME COURT FILING FEES (DUE TO PUBLIC CLOSURE OF COU	
5/7/2021	4113	District Ct Deficiency Notice	NOTICE OF APPEAL DEFICIENCY - CASE APPEAL STATEMENT - Transaction 8433578 - Approved By: NORI	
5/7/2021	1350	Certificate of Clerk	CERTIFICATE OF CLERK AND TRANSMITTAL - NOTICE OF APPEAL - Transaction 8433578 - Approved By: N	
5/7/2021	NEF	Proof of Electronic Service	Transaction 8433586 - Approved By: NOREVIEW : 05-07-2021:11:35:50	



1 CODE NO 2920  
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6 IN THE SECOND JUDICIAL DISTRICT COURT OF  
7 THE STATE OF NEVADA IN AND FOR THE COUNTY OF WASHOE  
8

9 COMPLETE CARE CONSULTING, LLC., Case No. CV20-02009

10 Petitioner,  
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Dept. No. 6

12 vs.  
13

14 SHANNON M. CHAMBERS, in her  
15 capacity as the Labor Commissioner of the  
16 State of Nevada and the STATE OF  
NEVADA, OFFICE OF THE LABOR  
COMMISSIONER,

Respondents.

17 ORDER GRANTING MOTION TO DISMISS

18 Before the Court is Respondent, Nevada Labor Commissioner's Motion to Dismiss  
19 for Failure to Exhaust Administrative Remedies filed February 9, 2021. Petitioner,  
20 Complete Care Consulting, LLC, filed its Opposition on February 23, 2021. Petitioner filed  
21 a Reply and submitted the matter for decision on March 3, 2021.

22 Accordingly, after extensive review of the papers and pleadings on file in this action  
23 together with the applicable law, the Court sets forth its Order as follows.

24 I. FACTS AND PROCEDURAL HISTORY

25 The Nevada Labor Commissioner ("Labor Commissioner") issued a Determination  
26 of Payroll Records Audit on September 17, 2020. Complete Care Consulting, LLC  
27 ("Complete Care") submitted a Request for Hearing and Objection to Determination on  
28 October 2, 2020. The Labor Commissioner issued a Final Order Setting Forth Findings of

1 Fact and Conclusions of Law on November 12, 2020. Complete Care filed its Petition for  
2 Judicial Review in this Court on December 14, 2020 but did not serve it until January 25,  
3 2021. In between the filing and service of the Petition for Judicial Review, on January 6,  
4 2021, the Labor Commissioner set the matter for a hearing to commence on January 28,  
5 2021. On January 26, 2021, one day after serving the Petition for Judicial Review Complete  
6 Care submitted a Notice of Want of Jurisdiction with Request to Vacate Hearing Set for  
7 January 28, 2021, to the Office of the Labor Commissioner. That same day, January 26,  
8 2021, the Labor Commissioner issued an Order vacating the hearing.

## 9 **II. STANDARD OF REVIEW; LAW AND ANALYSIS**

10 Rule 12(b)(5) of the Nevada Rules of Civil Procedure allows a party to move for  
11 dismissal based upon failure to state a claim upon which relief can be granted. The Labor  
12 Commissioner argues that dismissal is warranted because Complete Care has not  
13 exhausted administrative remedies.

14 The doctrine of failure to exhaust administrative remedies is well established in  
15 Nevada. “Whether couched in terms of subject-matter jurisdiction or ripeness, a person  
16 generally must exhaust all available administrative remedies before initiating a lawsuit,  
17 and failure to do so renders the controversy nonjusticiable. *Allstate Insurance Co. v.*  
18 *Thorpe*, 123 Nev. 565, 571-72, 170 P.3d 989, 993-94 (2007). “The ‘exhaustion doctrine’ is  
19 sound judicial policy. If administrative remedies are pursued to their fullest, judicial  
20 intervention may become unnecessary.” *First American Title v. County of Douglas*, 91 Nev.  
21 804, 806, 543 P.2d 1344, 1345 (1975). The administrative review process provides the  
22 district court with a fully developed record and administrative decision including factual  
23 findings by an administrative body with expertise in a particular area. *Benson v. State*  
24 *Engineer*, 131 Nev. 772, 780, 358 P.3d 221, 226 (2015) citing to *Malecon Tobacco, LLC v.*  
25 *State ex rel. Dep’t of Taxation*, 118 Nev. 837, 840–41, 59 P.3d 474, 476 (2002). “Indeed,  
26 resolving labor law complaints is perhaps one of the Labor Commissioner’s most significant  
27 enforcement mechanisms. In this manner, the Labor Commissioner’s expertise is  
28 optimized, and the parties then have an opportunity to petition the district court for judicial

1 review and, ultimately, appeal to [the Nevada Supreme] court.” *Baldonado v. Wynn Las*  
2 *Vegas, LLC*, 124 Nev. 951, 963, 194 P.3d 96, 104 (2008).

3 This Court’s review of the Labor Commissioner’s Final Order is conducted pursuant  
4 to NRS 233B.135. The Court may remand or affirm the final decision or set it aside in  
5 whole or in part. When reviewing an administrative agency’s decision, the Court defers to  
6 the agency’s findings of fact, but reviews questions of law de novo. *Bombardier*  
7 *Transportation (Holdings) USA, Inc., v. Nevada Labor Commissioner*, 135 Nev. 15, 18, 433  
8 P.3d 248, 252 (2019). Here the factual record is not fully developed because the Labor  
9 Commissioner did not hold a hearing. Therefore, the Court finds this case should be  
10 remanded to the Labor Commissioner for further proceedings.

11 Accordingly, and good cause appearing,

12 IT IS HEREBY ORDERED

13 1. Petitioner’s Motion to Dismiss is GRANTED.

14 2. This matter is REMANDED to the Labor Commissioner who shall  
15 conduct a hearing and enter a final decision.

16 Dated this 11th day of April, 2021

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DISTRICT JUDGE

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1 CODE 2540  
AARON D. FORD  
2 Attorney General  
ANDREA NICHOLS  
3 Senior Deputy Attorney General  
Bar No. 6436  
4 State of Nevada  
Office of the Attorney General  
5 100 N. Carson Street  
Carson City, NV 89701-4717  
6 (775) 684-1218 (phone)  
(775) 684-1156 (fax)

7 Attorneys for Respondents

9 IN THE SECOND JUDICIAL DISTRICT COURT OF  
10 THE STATE OF NEVADA IN AND FOR THE COUNTY OF WASHOE

11 COMPLETE CARE CONSULTING, LLC., Case No. CV20-02009

12 Petitioner, Dept. No. 6

13 vs.

14 SHANNON M. CHAMBERS, in her  
15 capacity as the Labor Commissioner of the  
State of Nevada and the STATE OF  
16 NEVADA, OFFICE OF THE LABOR  
COMMISSIONER,

17 Respondents.

18 NOTICE OF ENTRY OF ORDER

19 PLEASE TAKE NOTICE that on April 12, 2021 the above-entitled Court entered its  
20 Order Granting Motion to Dismiss. A copy of said Order is attached as Exhibit "1."

21 Respectfully Submitted this 13<sup>th</sup> day of April 2021.

22 AARON FORD  
23 Attorney General

24 By: /s/ Andrea Nichols  
ANDREA NICHOLS, Bar No. 6436  
25 Senior Deputy Attorney General  
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**AFFIRMATION**  
**(Pursuant to NRS 239B.030)**

The undersigned does hereby affirm that the preceding document *Notice of Entry of Order*, does not contain the social security number of any person.

Respectfully Submitted this 13<sup>th</sup> day of April 2021.

AARON FORD  
Attorney General

By: /s/ Andrea Nichols  
ANDREA NICHOLS, Bar No. 6436  
Senior Deputy Attorney General

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Brian R. Morris  
5455 S. Fort Apache Road 108-151  
Las Vegas, NV 89148

/s/ Susan Messina  
an employee of the  
Office of the Nevada Attorney General

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**SECOND JUDICIAL DISTRICT COURT**  
**COMPLETE CARE CONSULTING v. STATE OF NEVADA**

<b>EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>Number of Pages</b>
1	Order Granting Motion to Dismiss (Respondents' Motion to Dismiss for Failure to Comply with NRS 233B.131(1)(a))	4



# EXHIBIT 1

# EXHIBIT 1

1 CODE NO 2920  
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6 IN THE SECOND JUDICIAL DISTRICT COURT OF  
7 THE STATE OF NEVADA IN AND FOR THE COUNTY OF WASHOE  
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9 COMPLETE CARE CONSULTING, LLC., Case No. CV20-02009

10 Petitioner,  
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12 vs.

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14 capacity as the Labor Commissioner of the  
15 State of Nevada and the STATE OF  
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27 ("Complete Care") submitted a Request for Hearing and Objection to Determination on  
28 October 2, 2020. The Labor Commissioner issued a Final Order Setting Forth Findings of

1 Fact and Conclusions of Law on November 12, 2020. Complete Care filed its Petition for  
2 Judicial Review in this Court on December 14, 2020 but did not serve it until January 25,  
3 2021. In between the filing and service of the Petition for Judicial Review, on January 6,  
4 2021, the Labor Commissioner set the matter for a hearing to commence on January 28,  
5 2021. On January 26, 2021, one day after serving the Petition for Judicial Review Complete  
6 Care submitted a Notice of Want of Jurisdiction with Request to Vacate Hearing Set for  
7 January 28, 2021, to the Office of the Labor Commissioner. That same day, January 26,  
8 2021, the Labor Commissioner issued an Order vacating the hearing.

## 9 **II. STANDARD OF REVIEW; LAW AND ANALYSIS**

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14 The doctrine of failure to exhaust administrative remedies is well established in  
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17 and failure to do so renders the controversy nonjusticiable. *Allstate Insurance Co. v.*  
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19 sound judicial policy. If administrative remedies are pursued to their fullest, judicial  
20 intervention may become unnecessary." *First American Title v. County of Douglas*, 91 Nev.  
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22 district court with a fully developed record and administrative decision including factual  
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24 *Engineer*, 131 Nev. 772, 780, 358 P.3d 221, 226 (2015) citing to *Malecon Tobacco, LLC v.*  
25 *State ex rel. Dep't of Taxation*, 118 Nev. 837, 840-41, 59 P.3d 474, 476 (2002). "Indeed,  
26 resolving labor law complaints is perhaps one of the Labor Commissioner's most significant  
27 enforcement mechanisms. In this manner, the Labor Commissioner's expertise is  
28 optimized, and the parties then have an opportunity to petition the district court for judicial

1 review and, ultimately, appeal to [the Nevada Supreme] court." *Baldonado v. Wynn Las*  
2 *Vegas, LLC*, 124 Nev. 951, 963, 194 P.3d 96, 104 (2008).

3 This Court's review of the Labor Commissioner's Final Order is conducted pursuant  
4 to NRS 233B.135. The Court may remand or affirm the final decision or set it aside in  
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7 *Transportation (Holdings) USA, Inc., v. Nevada Labor Commissioner*, 135 Nev. 15, 18, 433  
8 P.3d 248, 252 (2019). Here the factual record is not fully developed because the Labor  
9 Commissioner did not hold a hearing. Therefore, the Court finds this case should be  
10 remanded to the Labor Commissioner for further proceedings.

11 Accordingly, and good cause appearing,

12 IT IS HEREBY ORDERED

13 1. Petitioner's Motion to Dismiss is GRANTED.

14 2. This matter is REMANDED to the Labor Commissioner who shall  
15 conduct a hearing and enter a final decision.

16 Dated this 11th day of April, 2021

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20 DISTRICT JUDGE  
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BRIAN MORRIS, ESQ.  
ANDREA NICHOLS, ESQ.  
JEFF DICKERSON, ESQ.

And, I deposited in the County mailing system for postage and mailing with the United States Postal Service in Reno, Nevada, a true and correct copy of the attached document addressed as follows:

Heidi Boe

Code 1350

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
IN AND FOR THE COUNTY OF WASHOE

**COMPLETE CARE CONSULTING, LLC,**

**Case No. CV20-02009**

**Petitioner,**

**Dept. No. 6**

**vs.**

**SHANNON M. CHAMBERS, in her capacity as the  
Labor Commissioner of the State of Nevada and the  
STATE OF NEVADA, OFFICE OF THE LABOR  
COMMISSIONER,**

**Respondents.**

**CERTIFICATE OF CLERK AND TRANSMITTAL – NOTICE OF APPEAL**

I certify that I am an employee of the Second Judicial District Court of the State of Nevada, County of Washoe; that on the 7th day of May, 2021, I electronically filed the Notice of Appeal in the above entitled matter to the Nevada Supreme Court.

I further certify that the transmitted record is a true and correct copy of the original pleadings on file with the Second Judicial District Court.

Dated this 7th day of May, 2021.

Alicia Lerud, Interim  
Clerk of the Court  
By /s/YViloria  
YViloria  
Deputy Clerk

Code 4132

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
IN AND FOR THE COUNTY OF WASHOE

**COMPLETE CARE CONSULTING, LLC,**

**Case No. CV20-2009**

**Dept. No. 6**

**Petitioner,**

**vs.**

**SHANNON M. CHAMBERS, in her capacity as the  
Labor Commissioner of the State of Nevada and the  
STATE OF NEVADA, OFFICE OF THE LABOR  
COMMISSIONER,**

**Respondents.**

**NOTICE OF APPEAL DEFICIENCY**

TO: Clerk of the Court, Nevada Supreme Court,  
and All Parties or their Respective Counsel of Record:

On May 5<sup>th</sup>, 2021, Attorney Jeffery A. Dickerson, Esq. for Complete Care Consulting, LLC, filed a Notice of Appeal with the Court. Attorney Dickerson was unable to include the Two Hundred Fifty Dollar (\$250.00) Supreme Court filing fee due to the public closure of the Second Judicial District Court Administrative Order 2021-05(A).

Pursuant to NRAP 3(a)(3), on May 7<sup>th</sup>, 2021, the Notice of Appeal will be filed with the Nevada Supreme Court. By copy of this notice. Attorney Dickerson was notified by electronic mail of the deficiency. (A notice to pay will be issued once the Notice of Appeal is filed in by the Nevada Supreme Court.)

Dated this 7th day of May, 2021.

Alicia Lerud, Interim  
Clerk of the Court  
By: /s/YViloria  
YViloria  
Deputy Clerk

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CERTIFICATE OF SERVICE

CASE NO. CV20-02009

I certify that I am an employee of the Second Judicial District Court of the State of Nevada, County Of Washoe; that on the 7th day of May, 2021, I electronically filed the Notice of Appeal Deficiency with the Clerk of the Court by using the ECF system.

I further certify that I transmitted a true and correct copy of the foregoing document by the method(s) noted below:

Electronically filed with the Clerk of the Court by using the ECF system which will send a notice of electronic filing to the following:

- BRIAN MORRIS, ESQ. for COMPLETE CARE CONSULTING, LLC
- ANDREA NICHOLS, ESQ. for SHANNON M. CHAMBERS et al
- JEFFREY DICKERSON, ESQ. for COMPLETE CARE CONSULTING, LLC

/s/YViloria  
YViloria  
Deputy Clerk