

IN THE SUPREME COURT OF THE STATE OF NEVADA

BENJAMIN B. CHILDS

Petitioner,

v.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, IN AND FOR THE
COUNTY OF CLARK, THE
HONORABLE ADRIANA ESCOBAR,

Respondents,

WLAB INVESTMENT, LLC, TKNR,
INC., a California Corporation, and
CHI ON WONG aka CHI KUEN WONG,
an individual, and KENNY ZHONG LIN,
aka KEN ZHONG LIN aka KENNETH
ZHONG LIN aka WHONG K. LIN aka
CHONG KENNY LIN aka ZHONG LIN,
an individual, and LIWE HELEN CHEN
aka HELEN CHEN, an individual and YAN
QIU ZHANG, an individual and
INVESTPRO LLC dba INVESTPRO
REALTY, a Nevada Limited Liability
Company, and MAN CHAU CHENG, an
individual, and JOYCE A. NICKRANDT,
an individual, and INVESTPRO
INVESTMENTS LLC, a Nevada Limited
Liability Company, and INVESTPRO
MANAGER LLC, a Nevada Limited
Liability Company and JOYCE A.
NICKDRANDT, an individual and does 1
through 15 and roe corporation I-XXX,

Real Parties in Interest

Supreme Court No:

Electronically Filed
District Court No. A-18-785917-C
Jun 01 2021 12:10 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

BENJAMIN B. CHILDS' PETITION
FOR WRIT OF MANDAMUS
OR WRIT OF PROHIBITION

Benjamin B. Childs, Esq.
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Petitioner

NRAP 26.1 DISCLOSURE

The undersigned certifies that the following are persons and entities as described in NRAP 26.1(a) and must be disclosed. These representations are made in order that the justices of this court may evaluate possible disqualification or recusal.

1. All parent corporations and publicly-held companies owning 10 percent or more of the party's stock: None.
2. Names of all law firms whose attorneys have appeared for the party or amicus in this case (including proceedings in the district court of before an administrative agency) or are expected to appear in this court: Day & Nance; Michael B. Lee, P.C.; Benjamin B. Childs, Esq.
3. If litigant is using a pseudonym, the litigant's true name: n/a

DATED this May 30, 2021

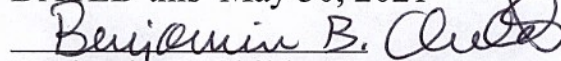

Benjamin B. Childs, Esq.
Nevada Bar No. 39468
Petitioner

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I RELIEF SOUGHT

Petitioner seeks a Writ of Mandamus or Writ of Prohibition [Petition] requiring the district court to vacate, or to prohibit enforcement of, the money judgment portion of the order filed May 25, 2021 [the Order] in the case of WLAB Investments, LLL v. TKNR, Inc. et al, Nevada Eighth Judicial District Court Case No. A-18-785917-C. The Order awarded Defendants (real parties in interest herein) NRCP 11 [Rule 11] sanctions against Plaintiff and previous counsel for Plaintiff, the Petitioner herein. The award was in violation of the express requirements of Rule 11 itself and in contravention of the overwhelming weight of judicial authority interpreting and applying that rule.

The Petition is based upon the grounds that the district court's order is without legal or factual basis and Respondent manifestly abused her

discretion by awarding Rule 11 sanctions. Petitioner is not a party to the lawsuit and does not have a plain, speedy and adequate remedy in the ordinary course of law. Marquis & Aurbach v. Eighth Judicial District Court, 122 Nev. 1147, 1154, 146 P.3d 1130, 1135 (2006).

II **ROUTING STATEMENT**

The case is presumptively assigned to Court of Appeals pursuant to NRAP 17(b)(5) as it concerns a “judgment exclusive of interest, attorney fees, and costs, of \$250,000 or less in a tort case.” The case involves a judgment which is solely for attorney fees.

III **ISSUES PRESENTED**

1. Writ of Mandamus or Writ of Prohibition standard.

2. The Respondent cannot award Rule 11 sanctions without Defendants filing a separate motion for sanctions.
3. The Respondent cannot award Rule 11 sanctions where the moving party fails to provide the other party with a 21-day window within which to withdraw allegedly offending papers.
4. The Order does not contain express findings of fact and law to establish why there is a violation of Rule 11.

IV POINTS AND AUTHORITIES

a. REASONS FOR THIS PETITION

Rule 11 has been a part of the rules of civil procedure going back as far as 1954. It has been amended several times over the years mainly to conform to the comparable federal rule. It was last amended in early 2019.

The Nevada Supreme Court has often used the federal rules and federal court interpretations as authoritative models for the Nevada Rules of Civil Procedure. See State Dept. Of Taxation v. Eighth Judicial District Court, 136 Nev.____, 466 P.3d 1281, 1284 (2020) , “Because these provisions mirror their federal counterparts, we turn to federal authority for guidance.” See, also, Exec. Mgmt., Ltd. u. Ticor Title Ins. Co., 118 Nev. 46, 53, 38 P.3d 872, 876 (2002), explaining that federal case law interpreting and applying the Federal Rules of Civil Procedure provides strong persuasive authority for this court when interpreting parallel provisions of the Nevada Rules of Civil Procedure.

The current version of Rule 11 is set forth below.

Signing Pleadings, Motions, and Other Papers;

Representations to the Court; Sanctions:

(a) Signature. Every pleading, written motion, and other

paper must be signed by at least one attorney of record in the attorney's name — or by a party personally if the party is unrepresented. The paper must state the signer's address, email address, and telephone number. Unless a rule or statute specifically states otherwise, a pleading need not be verified or accompanied by an affidavit. The court must strike an unsigned paper unless the omission is promptly corrected after being called to the attorney's or party's attention.

(b) Representations to the Court. By presenting to the court a pleading, written motion, or other paper — whether by signing, filing, submitting, or later advocating it — an attorney or unrepresented party certifies that to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- (1) it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;

(2) the claims, defenses, and other legal contentions are warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law or for establishing new law;

(3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and

(4) the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information.

(c) Sanctions.

(1) In General. If, after notice and a reasonable opportunity to respond, the court determines that Rule 11(b) has been violated, the court may impose an appropriate sanction on any attorney, law firm, or party that violated the rule or is responsible for the violation. Absent exceptional circumstances, a law firm must be held jointly responsible for a

violation committed by its partner, associate, or employee.

(2) Motion for Sanctions. A motion for sanctions must be made separately from any other motion and must describe the specific conduct that allegedly violates Rule 11(b). The motion must be served under Rule 5, but it must not be filed or be presented to the court if the challenged paper, claim, defense, contention, or denial is withdrawn or appropriately corrected within 21 days after service or within another time the court sets. If warranted, the court may award to the prevailing party the reasonable expenses, including attorney fees, incurred for presenting or opposing the motion.

(3) On the Court's Initiative. On its own, the court may order an attorney, law firm, or party to show cause why conduct specifically described in the order has not violated Rule 11(b).

(4) Nature of a Sanction. A sanction imposed under

this rule must be limited to what suffices to deter repetition of the conduct or comparable conduct by others similarly situated. The sanction may include nonmonetary directives; an order to pay a penalty into court; or, if imposed on motion and warranted for effective deterrence, an order directing payment to the movant of part or all of the reasonable attorney fees and other expenses directly resulting from the violation.

(5) Limitations on Monetary Sanctions. The court must not impose a monetary sanction:

(A) against a represented party for violating Rule 11(b)(2); or

(B) on its own, unless it issued the show-cause order under Rule 11(c)(3) before voluntary dismissal or settlement of the claims made by or against the party that is, or whose attorneys are, to be sanctioned.

(6) Requirements for an Order. An order imposing

a sanction must describe the sanctioned conduct and explain the basis for the sanction. (Irrelevant sections omitted).

Below is a short summary of the requirements of Rule 11 that an attorney must follow to assert a Rule 11 violation by opposing counsel.

1. A Rule 11 motion must be made separately from any other motion;
2. The motion must describe the specific conduct that allegedly violates section 11(b).
3. The motion must be served on opposing counsel but not filed with the court. This is the 21 day “safe harbor” provision which allows the targeted attorney the opportunity to correct or withdraw the alleged wrongful claim or assertion.

4. If the opposing counsel fails or declines to make the correction within the safe harbor provision, the moving party may then file the Rule 11 motion and present it to the court.
5. The court has to make express findings of fact and law to establish why there is a violation of Rule 11.
6. If the court determines there is a Rule 11 violation, the sanction is limited by subpart (c)(4) to that which deters the attorney and/or party from the conduct. It can include only those attorney fees and expenses directly related to the violation.

The trial court has authority under subpart (c)(3) to issue a Show Cause Order why Rule 11 sanctions should be imposed on an attorney or party for violating Rule 11. The Show Cause Order must describe the specific conduct that violates Rule 11(b). The trial court cannot impose a

sanction prior to issuing the Order to Show Cause and completing the required proceeding. If sanctions are imposed, the Order must specifically state the offending conduct and the appropriate sanction.

The question before this Court is how many of these required proceedings were followed by counsel and the Respondent Court in this case? The correct, and only, answer is “NONE.”. The entire trial court record in this case is totally devoid of all of these requirements. Yet, the Respondent Judge has issued a personal “judgment” against Petitioner for \$128,166.78 based on a claimed violation of Rule 11. [App. Vol.2, 259:16]

This case is substantially similar to Frisco v. Eighth Judicial District Court, 132 Nev. 970, 2016 Nev. Unpub. LEXIS 366 (2016) wherein the District Court Judge imposed Rule 11 sanctions on the petitioners although no motion for Rule 11 sanctions was filed. A writ was filed and this Court

vacated the sanctions award for total lack of compliance with the specific requirements of Rule 11. This case is not being cited as authority per se but the fact pattern and the basis of this Court's decision mirrors to the instant case.

Many of the Nevada cases construing or applying Rule 11 go back many years. In this case, the Petitioner requests this honorable court to reaffirm its interpretations of Rule 11 and to conform to prevailing federal court standards for imposition of sanctions.

b. THE ESSENTIAL FACTS AND THE LITIGATION CHRONOLOGY

Petitioner is an attorney licensed to practice law since 1990. Over the past 31 years, petitioner has handled hundreds, probably thousands, of cases and the law practice is now focused largely on real estate law.

Petitioner was retained by WLAB Investment, LLC, in 2018 to represent the company following the purchase of a parcel of residential, rental real estate in Las Vegas. Factual investigation was performed, along with relevant legal research, prior to filing any lawsuit. After the appropriate pre-filing investigations were completed, the complaint was filed on December 11, 2018. This was not a frivolous lawsuit. An expert witness was timely retained and disclosed in the case whose opinions supported Plaintiff's causes of action.

During the course of litigation, the complaint was amended twice, both times being with trial court approval and the second time by stipulation with Defendants. This was a heavily contested case and considerable discovery was done. Defendants had outstanding discovery responses, as ordered by the Discovery Commissioner, when the case

was summarily terminated. The real parties entered into a stipulation on May 28, 2020 to extend discovery deadlines. On October 21, 2020 Defendant filed a motion to enlarge discovery. By Order filed November 4, 2020, the discovery cutoff was extended by the Court to March 2, 2021.

[App. Vol. 1, 3:2]

On November 11, 2020, the Defendants filed a motion for leave to amend their answer and to file counterclaims and a third party claim.

Defendants never filed an amended answer, a counterclaim nor a third party claim.

A Second Amended Complaint was filed by Stipulation and Order filed on November 23, 2020, and a Second Amended Complaint was filed the same day. Defendants never filed an answer to the Second Amended Complaint.

The Defendants did not complete the discovery phase before filing a summary judgment motion on December 15, 2020. [App. Vol. 1, 7-39].

Plaintiff filed an Opposition and Countermotions on December 29, 2020. [App. Vol. 1, 40-58] The hearing was rescheduled by the Court several times, during which time Defendants filed a Reply to Opposition and Opposition to Countermotions on January 21, 2021 [App. Vol. 1, 59 -74] and a Supplement to Reply on January 29, 2021 [App. Vol. 1, 75 - 96].

Plaintiff's filed a Reply to Opposition to Countermotions on February 16, 2021 [App. Vol. 1, - 109] and a Supplement to Reply to Opposition to Countermotions on March 4, 2021 [App. Vol. 1, 110-139].

Petitioner and his client had certain differences of opinion over the conduct of the case and another attorney substituted into the case the day before the summary judgment motion hearing and argued the summary

judgment motion on March 11, 2021.

The court granted Defendants' motion for summary judgment and a written order was filed on March 30, 2021. [App. Vol. 1, 140 - 185] The March 30, 2021 Order directed Defendants to "file a separate order to show cause pursuant to Nevada Rule of Civil Procedure 11(c)(3) on Plaintiff and Plaintiff's prior counsel, Benjamin Childs, as this Honorable Court determined that Plaintiff has violated Rule 11(b)" [App. Vol. 1, 182:24-26] Thereafter communications between Defendants' counsel and the court apparently transpired which resulted in the portion of the March 30, 2021 Order to Show Cause hearing being vacated and an Amended Order being filed on April 7, 2021. [App. Vol. 1, 193-250] The email chain commencing April 2, 2021 in which Petitioner was involved is attached [App. Vol. 1, 186 - 192] , although obviously other communications must

have transpired of which Petitioner is not aware.

Finally, Plaintiff filed a motion for reconsideration which was decided by minute order [App. Vol. 2, 250-253] and an Order was filed on May 25, 2021 [App. Vol. 2, 254-263] which is the subject of this Petition because a money judgment is expressly entered against Petitioner.

c. CURRENT FEDERAL STANDARDS FOR RULE 11

The overwhelming majority of federal appellate courts have held that the conditions of Rule 11 must be strictly followed and that Rule 11 should be rarely used. In Operating Engineers Pension Trust v. AC Co., 859 F.2d 1336, 1343-44 (9th Cir. 1988), the court not only reversed the Rule 11 sanctions order; it reversed the entire case on the merits. The decision noted other cases in which the Court of Appeals did the same thing. The

opinion ended with a strong admonition that lower courts show more restraint because “Rule 11 is an extraordinary remedy, one to be exercised with extreme caution.”

The requirement of a separate Rule 11 motion is mandatory. A request for Rule 11 sanctions cannot be contained within any other motion filed by the other parties. The only reference to Rule 11 in Defendants’ Summary Judgment Motion is at pages 30-31 of the Defendant’s Motion for Summary Judgment filed on December 15, 2020. [App. Vol 1, 36 - 37]

There is no separate Rule 11 motion.

Radcliffe v. Rainbow Constr. Co., 254 F.3d 772, 789 (9th Cir. 2001)

held that defendant construction company was not entitled to Rule 11 sanctions because it failed to comply with the separate motion requirement when it included its Rule 11 motion along with a motion for summary

judgment. In Nuwesra v. Merrill Lynch, Fenner & Smith, Inc., 174 F.3d 87, 94 (2d Cir. 1999), the court rejected defendants' argument to treat their affidavit of service and reply affidavit as a motion for Rule 11 sanctions because a motion must "be made separately from other motions or requests") (citation omitted); Also note Barber v. Miller, 146 F.3d 707, 710 (9th Cir. 1998) in which the court acknowledged that defendant gave plaintiff multiple warnings but concluding that such warnings were not motions "and the Rule requires service of a motion".

The 21 day safe harbor provision is also considered a mandatory step. Radcliffe, supra, at 788. Other federal appellate courts concur. Tompkins v. Cyr, 202 F.3d 770, 788 (5th Cir. 2000); Elliott v. Tilton, 64 F.3d 213, 216 (5th Cir. 1995) and Penn, LLC v. Prosper Bus. Dev. Corp., 773 F.3d 764 (6th Cir. 2014). In Corley v. Rosewood Care Ctr., Inc., 142

F.3d 1041, 1058 (7th Cir. 1998), the defendants conceded that Rule 11 sanctions were improper where they had failed to comply with the separate motion and safe harbor provisions of Rule 11.

The purpose of the “safe harbor” provision is to provide an opportunity to the targeted attorney and/or party to withdraw a specific challenged claim or defense. Barber v. Miller 146 F.3d 707 (9th Cir. 1998) *supra*. A party cannot wait until after summary judgment to seek Rule 11 sanctions. The Barber court cited to the Advisory Committee Notes for the rule as follows.

The purpose of the amendments is made abundantly clear by the Advisory Committee Notes:

These provisions are intended to provide a type of "safe harbor" against motions under Rule 11 in that a party will not be subject to sanctions on the basis of another party's motion

unless, after receiving the motion, it refused to withdraw that position or to acknowledge candidly that it does not currently have evidence to support a specified allegation. Under the former rule, parties were sometimes reluctant to abandon a questionable contention lest that be viewed as evidence of a violation of Rule 11; under the revision, the timely withdrawal of a contention will protect a party against a motion for sanctions.

This Court has held similarly in the Frisco decision as follows :

NRCP 11 requires parties seeking sanctions to follow very specific procedures. In particular, NRCP 11(c)(1)(A) requires the movant to allow the opposing party 21 days to withdraw or correct the violation before filing a motion for sanctions. There is no evidence here that real parties in interest afforded petitioners 21 days to correct the specified errors. Thus, the sanctions were not properly granted under NRCP 11.

Due process is heavily involved in Rule 11 proceedings. Subsection (c)(2) of the Rule requires notice of the specific claims that are alleged to be improper. The targeted attorney/party must be given an opportunity to respond. No such opportunity was provided for in this case.

Petitioner was not even served with the Order [App. Vol. 2, 263] and the Notice of Entry of Order is inaccurate was Petitioner was not served with the Notice of Entry of Order through the Odyssey filing system.

The entire basis for the fee award in this case seems to center around disputes about the facts of the case. Plaintiff developed the evidence of alleged defects and non-disclosures in the Property. Plaintiff hired an expert witness who investigated the property and noted the deficiencies and supported Plaintiff's allegation for the causes of action involving failure to disclose known defects. Defendants also had their

evidence and contentions. There were many disputed genuine and material facts in this case. The Respondent Judge selected only those “facts” which supported the Defendants.

The case itself is being appealed, Nevada Supreme Court case # 82835. Perhaps another appeal will have to be filed as the May 25, 2021 Order expressly states that the April 7, 2021 Order was not a final order. [App. Vol 2, 257:17-21] If the Supreme Court determines that there were genuine issues of fact precluding summary judgment, both the April 7, 2021 and the May 25, 2021 Orders will be reversed. That alone would defeat any claim that there were Rule 11 problems with the Plaintiff's case.

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IV. STATEMENT OF REASONS THE WRIT SHOULD ISSUE

A writ of mandamus or prohibition is an extraordinary remedy that may be issued to compel an act that the law requires. Cote H. v. Eighth Judicial Dist. Court, 175 P.3d 906, 907-08 (Nev. 2008). A writ of mandamus may also issue to control or correct a manifest abuse of discretion. Id. A writ shall issue when there is no plain, speedy and adequate remedy in the ordinary course of law pursuant to NRS 34.170; see, also, Sims v. Eighth Judicial District Court, 125 Nev. 126, 206 P.3d 980 (2009). This Court has complete discretion to determine whether a writ will be considered. Halverson v. Miller, 124 Nev. 484, 186 P.3d 893 (2008). (“the determination of whether to consider a petition is solely within this court’s discretion.”); Sims, 206 P.3d at 982 (“it is within the discretion of this court to determine whether these petitions will be considered.”).

Specific to the facts of this case, extraordinary writs are a proper avenue for attorneys to seek a review of sanctions as Petitioner was not a party in the underlying action and, therefore, cannot appeal the court's order. Watson Rounds v. Eighth Jud. Dist. Ct., 131 Nev 783, 787, 358 P.3d 228, 231 (2015).

“A writ of mandamus will issue to control a court's arbitrary or capricious exercise of discretion.” Marshall v. District Court, 108 Nev. 459, 466, 836 P.2d 47, 52 (1992) Directly related to this Petition, the Marshall court also held that “Rule 11 sanctions are not intended to chill an attorney's enthusiasm or creativity in reasonably pursuing factual or legal theories, and a court should avoid employing the wisdom of hindsight in analyzing an attorney's actions...” .

Even where there is an available legal remedy, the Court may exercise its discretion to entertain a petition for mandamus relief where the circumstances reveal urgency and strong necessity. Ashokan v. State, 109 Nev. 662, 667, 856 P.2d 244, 247 (1993) A writ of prohibition may issue to arrest the proceedings of a district court exercising its judicial functions, when such proceedings are in excess of the jurisdiction of the district court. NRS 34.320. A writ of mandamus is available to compel the performance of an act which the law requires as a duty resulting from an office trust or station. NRS 34.160.

V. PRAYER FOR RELIEF

An extraordinary writ is an available remedy in this case. There was no compliance with the requirement of Rule 11.

Petitioner prays that the court issue a writ mandating the Respondent Court to vacate the \$128,166.78 judgment against Petitioner, thereby also the Plaintiff, contained in the May 25, 2021 Order. Petitioner further prays that the court issue a writ prohibiting the Respondent Court from enforcing the \$128,166.78 judgment against Petitioner, thereby also the Plaintiff, contained in the May 25, 2021 Order, and prohibiting Defendants from enforcing or attempting to execute against Petitioner, and thereby also Plaintiff, on the \$128,166.78 judgment in the May 25, 2021 Order.

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DECLARATION IN LIEU OF AFFIDAVIT OF VERIFICATION IN SUPPORT
OF PETITION FOR WRIT OF MANDAMUS OR WRIT OF PROHIBITION
[NRS 53.045]

BENJAMIN B. CHILDS STATES :

1. That affiant is the Petitioner in the Writ of Mandamus or Writ of Prohibition filed with this verification.
2. The affiant was counsel for Plaintiff/Real Party in Interest WLAB INVESTMENT, LLC in Nevada Eighth Judicial District Court Case No. A-18785917-C.
3. That affiant verifies that the facts stated within the Petition of Mandamus or Writ of Prohibition are within the knowledge of Petitioner.
4. All documents contained in the Petitioners' Appendix filed herewith are true and correct copies of the pleadings and documents and they are represented to be in the Petitioners' Appendix and as cited herein.
5. This Petition complies with Nev. R. App. 21(d) and Nev. R. App. P. 32(e)(2).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 30, 2021
(date)

Benjamin B. Chubb
(signature)

CERTIFICATE OF COMPLIANCE

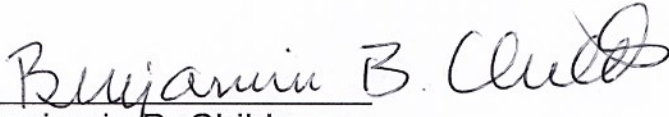
I hereby certify that this Petition complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6) because:

This Petition has been prepared in a proportionally spaced typeface using Wordperfect in Arial, font size 14.

I further certify that this brief complies with the page or type-volume limitations of NRAP 32(a)(7), it is proportionately spaced, has a typeface of 14 points or more and contains 4,187 words.

Finally, I hereby certify that I have read this Petition and to the best of my knowledge, information, and belief, it is not frivolous or interposed for any improper purpose. I further certify that this brief complies with all

application Nevada Rules of Appellate Procedure, in particular NRAP 28(e)(1) which requires every assertion in the brief regarding matters in the record to be supported by a reference to the page and volume number, if any, of the transcript or appendix where the matter relied on is to be found. I understand that I may be subject to sanctions in the event that the accompanying brief is not in conformity with the requirement of the Nevada Rules of Appellate Procedure.


Benjamin B. Childs
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318 S. Maryland Parkway
Las Vegas, NV 89101
Telephone: 702-251-0000
Petitioner

CERTIFICATE OF MAILING

I hereby certify that on May 30, 2021, I served the foregoing
BENJAMIN B. CHILDS' PETITION FOR WRIT OF MANDAMUS OR

PROHIBITION upon the following parties by placing a true and correct
copy thereof in the United States Mail, priority mail, in Las Vegas, Nevada
with first class postage fully prepaid:

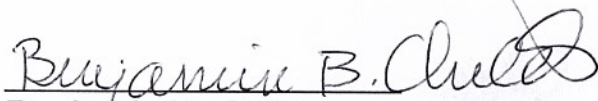
Honorable Adriana Escobar
Nevada Eighth Judicial District Court
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Las Vegas, NV 89155
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Benjamin B. Childs
Nevada Bar No. 3946
Petitioner



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| Priority Mail® 1-Day 1 | | | \$8.55 |
| Henderson, NV 89074 | | | |
| Weight: 1 lb 9.40 oz | | | |
| Expected Delivery Date | | | |
| Wed 06/02/2021 | | | |
| Tracking #: | | | |
| 9505 5066 2146 1150 1313 22 | | | |
| Insurance | | | \$0.00 |
| Up to \$50.00 included | | | |
| Total | | | \$8.55 |

| | | | |
|-----------------------------|--|--|--------|
| Priority Mail® 1-Day 1 | | | \$8.55 |
| Las Vegas, NV 89104 | | | |
| Weight: 1 lb 9.70 oz | | | |
| Expected Delivery Date | | | |
| Wed 06/02/2021 | | | |
| Tracking #: | | | |
| 9505 5066 2146 1150 1313 46 | | | |
| Insurance | | | \$0.00 |
| Up to \$50.00 included | | | |
| Total | | | \$8.55 |

| | | | |
|-----------------------------|--|--|---------|
| Priority Mail® 2-Day 1 | | | \$10.10 |
| Carson City, NV 89701 | | | |
| Weight: 1 lb 9.70 oz | | | |
| Expected Delivery Date | | | |
| Fri 06/04/2021 | | | |
| Tracking #: | | | |
| 9505 5066 2146 1150 1313 60 | | | |
| Insurance | | | \$0.00 |
| Up to \$50.00 included | | | |
| Total | | | \$10.10 |

| | | | |
|-----------------------------|--|--|--------|
| Priority Mail® 1 | | | \$8.55 |
| Las Vegas, NV 89155 | | | |
| Weight: 1 lb 12.70 oz | | | |
| Expected Delivery Date | | | |
| Wed 06/02/2021 | | | |
| Tracking #: | | | |
| 9505 5066 2146 1150 1313 84 | | | |
| Insurance | | | \$0.00 |
| Up to \$50.00 included | | | |
| Total | | | \$8.55 |

Grand Total: \$35.75

Credit Card Remitted \$35.75

Card Name: VISA
Account #: XXXXXXXXXXXX8624
Approval #: 030740
Transaction #: 409
Receipt #: 000409
AID: A0000000031010
AL: VISA CREDIT
PIN: Not Required

Chip

Miao