

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: 82967

District Court No: A-18-785917-C
Electronically Filed
Jun 01 2021 03:50 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

PETITIONER'S MOTION
FOR STAY

INTRODUCTION AND BACKGROUND

Petitioner Benjamin B. Childs (Petitioner herein) moves this honorable Court to Order a stay of execution of the monetary judgment portion of the Order Granting in Part, and Denying in Part, Plaintiff's Motion to Reconsider and Judgment Against Plaintiff and Previous Counsel filed on May 25, 2021 in the Eighth Judicial District Court, Case # A-18-785917-C. (The Order herein, attached as Exhibit 1) The relevant judgment language affecting Petitioner is on page 4 of the Order [Exhibit 1, 6:5-17], and set forth below.

IT IS FURTHER ORDERED, ADJUDICATED, AND DECREED that Judgment is entered in favor of Defendants against Plaintiff, and its former counsel, Benjamin Childs, individually, and Benjamin B. Childs, Esq, the law firm, jointly and severally, in the amount of One Hundred Twenty-Eight Thousand One Hundred Sixty-Six Dollars and Seventy-Eight cents (\$128,166.78) and that they pay Defendants the following amounts:

1. The principal sum of \$118,955.014 in attorneys' fees;
2. The principal sum of \$9,211.64 for costs incurred to date;
and
3. Post-judgment interest from the date of the entry of the underlying Order for the attorneys' fees and costs be granted at the statutory rate of 5.25% per annum.

A total Judgment in favor of Defendants, and against Plaintiff, and its former counsel, Benjamin Childs, individually, and Benjamin B. Childs, Esq, the law firm, jointly and severally, in the amount of \$128,166.78, all to bear interest at the statutory rate of 5.25% per annum until paid in full.

Petitioner filed his Petition (the Petition herein) for Writ of Mandamus or Writ of Prohibition on June 1, 2021.

Although neither the Notice of Entry Order nor the Order were served on Petitioner, [Exhibit 1, 10] this motion is filed to address the issue before the expiration of the 30 day automatic stay of execution under NRCP 62(a).

Although arguably 30 day time limit in NRCP 62(a) has not started to

run against Petitioner, this Motion is filed in a abundance of caution to address the issue.

The underlying case itself is being appealed, Nevada Supreme Court case # 82835, filed May 3, 2021. Perhaps another appeal will have to be filed as the Order expressly states that the April 7, 2021 Order on appeal in case # 82835 was not a final order. [Exhibit 1, 4:17 - 21]

SUMMARY OF BASIS OF THE PETITION

The Petition documents the relevant procedural history resulting in the Order, supported by documents in the Appendix. In a nutshell, Petitioner was retained by WLAB Investment, LLC in 2018 to initiate a lawsuit following purchase of a residential, rental property. Without detailing the extensive litigation, motion and discovery practice, the

conclusion was a summary judgment in favor of Real Parties in Interest,

(Defendants herein) TKNR, INC., CHI ON WONG aka CHI KUEN WONG,

KENNY ZHONG LIN, aka KEN ZHONG LIN aka KENNETH ZHONG LIN

aka WHONG K. LIN aka CHONG KENNY LIN aka ZHONG LIN, LIWE

HELEN CHEN aka HELEN CHEN, YAN QIU ZHANG, INVESTPRO LLC

dba INVESTPRO REALTY, MAN CHAU CHENG, and JOYCE A.

NICKRANDT, INVESTPRO INVESTMENTS LLC, and INVESTPRO

MANAGER LLC.

The Petition is based on the fact that Defendants only mention

imposition of a Rule 11 sanction judgment in their Defendants' Summary

Judgment Motion filed on December 15, 2020 at pages 30-31. [App. Vol

1, 36 - 37] There was no compliance with the 21 day safe harbor

provision. There is no separate Rule 11 motion. There was no show

cause hearing. There were no express findings of fact and law to establish why there is a violation of Rule 11.

As set forth in the Petition, 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. Nevada courts concur.

Directly related to the Petition and this Motion, Marshall v. District Court, 108 Nev. 459, 466, 836 P.2d 47, 52 (1992) 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...” .

Petitioner will not repeat in this Motion the extensive legal citations set forth in the Petition, but suffice it to say that the law is well settled on this issue. Rule 11 is to be used sparingly and strict compliance with the

rule is required.

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.

In this case, none of these requirements were met.

BASIS OF THE MOTION

Petitioner is not a party to the litigation and cannot seek a stay at the trial court level under NRCP 62. Thus, Petitioner moves directly to this Court pursuant to NRAP 8. The relevant portion of NRAP 8 to consider regarding this Motion is subsection c, set forth below.

(c) Stays in Civil Cases Not Involving Child Custody. In deciding whether to issue a stay or injunction, the Supreme Court or Court of Appeals will generally consider the following factors:

(1) whether the object of the appeal or writ petition will be defeated if the stay or injunction is denied; (2) whether appellant/petitioner will suffer irreparable or serious injury if the stay or injunction is denied; (3) whether respondent/real party in interest will suffer irreparable or serious injury if the stay or injunction is granted; and (4) whether appellant/petitioner is likely to prevail on the merits in the appeal or writ petition.

DISCUSSION

The NRAP 8 (c) factors all mitigate toward granting the stay. First, the object of the Petition will likely be defeated if Defendants are allowed to proceed with collection of the judgment. One or all of the Defendants could execute against Petitioner's assets, and Petitioner would have no recourse.

Second, if the stay is denied Petitioner will suffer irreparable harm

because the judgment will either have to be paid or his assets will be risk for execution.

Third, judgment creditors will suffer no irreparable injury because the status quo remains.

Fourth, Petitioner is likely to prevail in the Petitioner. This is the biggest factor. As set forth in the Petition, a \$128,166.78 judgment was entered pursuant to NRCP 11 without compliance with any of the requirements of that rule.

CONCLUSION

Petitioner seeks a stay of execution prohibiting Defendants collectively or individually or by assignment, or the successors or assignees, from enforcing or attempting to execute against Petitioner on the Order, specifically the \$128,166.78 judgment contained on Page 4.

/s/ Benjamin B. Childs

BENJAMIN B. CHILDS, ESQ.
Petitioner

CERTIFICATE OF MAILING

I hereby certify that on this June 1, 2021, I served this
PETITIONER'S MOTION FOR STAY, with Exhibit, 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
Department 14
200 Lewis Ave.
Las Vegas, NV 89155

Aaron Ford, Esq.
Attorney General
Nevada Department of Justice
100 North Carson Street
Carson City, NV 89701

Steven L. Day, Esq
Day & Nance
1060 Wigwam Parkway
Henderson, NV 89074

///

Michael B. Lee, Esq.
Michael Mathis, Esq.
Michael B. Lee, P.C.
1820 E. Sahara Ave., Suite 110
Las Vegas, NV 89104

/s/ Benjamin B. Childs

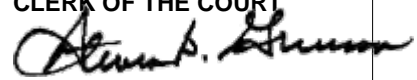
Benjamin B. Childs
Nevada Bar No. 3946
Petitioner

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1



MICHAEL B. LEE, ESQ. (NSB 10122)
MICHAEL B. LEE P.C.
1820 E. Sahara Ave., Ste. 110
Las Vegas, NV 89104
Office: (702) 731-0244
Fax: (702) 477-0096
Email: mike@mblnv.com
Attorney for Defendants

IN THE EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

W L A B INVESTMENT, LLC,

Plaintiff,

vs.

CASE NO.: A-18-785917-C

DEPT. NO.: XIV

**NOTICE OF ENTRY OF ORDER
GRANTING, IN PART, AND DENYING,
IN PART, PLAINTIFF'S MOTION TO
RECONSIDER AND JUDGMENT
AGAINST PLAINTIFF AND PREVIOUS
COUNSEL**

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. NICKRANDT, an
individual and Does 1 through 15 and Roe
Corporation I - XXX,

Defendants.

And Related Actions.

TO: ALL PARTIES

YOU, AND EACH OF YOU, will please take notice that an order and judgment in this
matter was entered in this matter on May, 2021. A copy of said ORDER and JUDGMENT is
attached hereto and incorporated herewith by reference.

Dated this 25th day of May, 2021.

/s/ Michael Lee
MICHAEL B. LEE, ESQ. (NSB 10122)
Attorneys for Defendants

MICHAEL B. LEE, P.C.
1820 E. SAHARA AVENUE, SUITE 110
LAS VEGAS, NEVADA 89104
TEL – (702) 477.7030; FAX – (702) 477.0096

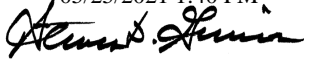
CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 25th day of May, 2021, I placed a copy of **NOTICE OF ENTRY OF ORDER GRANTING, IN PART, AND DENYING, IN PART, PLAINTIFF’S MOTION TO RECONSIDER AND JUDGMENT AGAINST PLAINTIFF AND PREVIOUS COUNSEL** as required by Eighth Judicial District Court Rule 7.26 by delivering a copy or by mailing by United States mail it to the last known address of the parties listed below, facsimile transmission to the number listed, and/or electronic transmission through the Court’s electronic filing system to the e-mail address listed below.

BENJAMIN B. CHILDS, ESQ.
318 S. Maryland Parkway
Las Vegas, Nevada 89101
Telephone: (702) 251-0000
Email: ben@benchilds.com

STEVEN L. DAY, ESQ.
DAY & NANCE
1060 Wigwam Parkway
Henderson, NV 89074
Tel – 702.309.3333
Fax – 702.309.1085
sday@daynance.com
Attorneys for Plaintiff

/s/ Mindy Pallares
An employee of MICHAEL B. LEE, P.C.


CLERK OF THE COURT

MICHAEL B. LEE, ESQ. (NSB 10122)
MICHAEL MATTHIS, ESQ. (NSB 14582)
MICHAEL B. LEE, P.C.
1820 East Sahara Avenue, Suite 110
Las Vegas, Nevada 89104
Telephone: (702) 477.7030
Facsimile: (702) 477.0096
mike@mblnv.com
Attorney for Defendants

IN THE EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

W L A B INVESTMENT, LLC,
Plaintiff,
vs.

CASE NO.: A-18-785917-C
DEPT. NO.: XIV

**ORDER GRANTING, IN PART, AND
DENYING, IN PART, PLAINTIFF'S
MOTION TO RECONSIDER
AND
JUDGMENT AGAINST PLAINTIFF AND
PREVIOUS COUNSEL**

Date of Hearing: May 17, 2021
Time of Hearing: chambers

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.
NICKRANDT, an individual and Does 1
through 15 and Roe Corporation I - XXX,
Defendants.

This matter being set for hearing before the Honorable Court on May 18, 2021 at 10:00
a.m., on W L A B INVESTMENT, LLC ("WLAB" or "Plaintiff"), Motion to Reconsider
("Motion"), by and through its attorney of record, DAY & NANCE. Defendants' TKNR INC.,
CHI ON WONG aka CHI KUEN WONG, KENNY ZHONG LIN, aka KEN ZHONG LIN aka
KENNETH ZHONG LIN aka WHONG K. LIN aka CHONG KENNY LIN aka ZHONG LIN,
LIWE HELEN CHEN aka HELEN CHEN, YAN QIU ZHANG, INVESTPRO LLC dba
INVESTPRO REALTY, MAN CHAU CHENG, JOYCE A. NICKRANDT, INVESTPRO

1 INVESTMENTS LLC, and INVESTPRO MANAGER LLC, (collectively, the “Defendants”)
2 filed an Opposition to the Motion and appeared by and through its counsel of record, MICHAEL
3 B. LEE, P.C.

4 Pursuant to Administrative Order 21-03 and preceding administrative orders, this matter
5 may be decided after a hearing, decided on the pleadings, or continued. In an effort to comply
6 with Covid-19 restrictions, and to avoid the need for hearings when possible, this Court has
7 determined that it was appropriate to decide this matter based on the pleadings submitted. Upon
8 thorough review of the pleadings, the Court issues the following order:

9 1. Leave for reconsideration of motions is within this Court’s discretion under
10 EDCR 2.24.

11 2. A district court may reconsider a previously decided issue if substantially
12 different evidence is subsequently introduced or the decision is clearly erroneous. See *Masonry*
13 *& Tile Contractors v. Jolley, Urga & Wirth*, 113 Nev. 737, 741 (1997).

14 3. Plaintiff seeks reconsideration of this Court’s April 7, 2021, Amended Order
15 Granting Defendants Motion for Summary Judgment, or in the Alternative, Partial Summary
16 Judgment (“Amended Order”).

17 4. Although Defendants argue that Plaintiff’s Notice of Appeal divests this Court of
18 jurisdiction to rule on the Motion, this Court disagrees because the Amended Order was not final
19 and appealable by virtue of Plaintiff filing the Motion. Therefore, the appeal was premature, and
20 the court is not divested of jurisdiction on the filing of a premature notice of appeal, allowing the
21 court to rule on the Motion. See NRAP 4(a)(6).

22 5. The Motion was timely filed within fourteen (14) days of the Notice of Entry of
23 the Amended Order.

24 6. Plaintiff spends a majority of its Motion rehashing the facts of the underlying
25 dispute. Plaintiff argues that exhibits the Court relied on in granting Defendants underlying
26 motion for summary judgment namely, the Residential Purchase Agreement and the Second
27 Residential Purchase Agreement were not properly authenticated. Plaintiff additionally argues
28 that Defendants discussed an email from Chen to Ms. Zhu without providing a foundation for the

1 email. Plaintiff's argument is that this Court committed clear error by relying on unauthenticated
2 documents, or hearsay, in ruling on Defendants' motion for summary judgment.

3 7. In opposing summary judgment, Plaintiff was required to point to specific facts
4 creating a genuine issue of material fact. See *LaMantia v. Redisi*, 118 Nev. 27, 29 (2002).
5 Plaintiff did not do so.

6 8. Defendants were not required to authenticate the first and second Residential
7 Purchase Agreement before this Court could rely on those documents in granting summary
8 judgment.

9 9. Plaintiff did not contest the authenticity of the disputed documents in opposing
10 summary judgment.

11 10. Plaintiff could have objected that these documents, which were Defendants
12 repeatedly cite to in their motion for summary judgment, cannot be presented in a form that
13 would be admissible in evidence. See NRCP 56(b)(2). However, Plaintiff did not so object.

14 11. The summary judgment hearing was not a trial. Authentication is for purposes of
15 introducing evidence at trial; therefore, Plaintiff's authentication argument lacks merit.

16 12. Plaintiff has not demonstrated that this Court's ruling was clearly erroneous.

17 13. Plaintiff has not demonstrated that this Court's decision to grant Rule 11 sanctions
18 was clearly erroneous. However, this Court does clarify that the sanctions are awarded against
19 Plaintiff's former counsel, Ben Childs, and not Plaintiff's current counsel, Mr. Day.

20 14. Defendants also ask that this Court issue an award of attorney fees and costs in
21 the amount of **\$128,166.78** related to the Courts' April 7, 2021 Order this Court granting
22 Defendants' attorney fees and costs pursuant to Rule 11. Plaintiff, through its former or new
23 counsel, does not oppose the specific amounts requested.

24 15. As such, this Court grants the amount Defendants seek and enters judgment
25 against Plaintiff and their former counsel, Ben Childs, Esq. in the amount of One Hundred
26 Twenty-Eight Thousand One Hundred Sixty-Six Dollars and Seventy-Eight cents (**\$128,166.78**).

27 16. Defendants' counter-motion for additional Rule 11 sanctions against Plaintiff for
28 filing the Motion is denied.

1 **IT IS HEREBY ORDERED, ADJUDICATED, AND DECREED** that the Motion is
2 GRANTED, in part, and DENIED, in part, as the Court’s ruling was not clearly erroneous but
3 clarifies the attorney fees and costs is awarded against Plaintiff and its former counsel Ben
4 Childs, Esq.

5 **IT IS FURTHER ORDERED, ADJUDICATED, AND DECREED** that Judgment is
6 entered in favor of Defendants against Plaintiff, and its former counsel, Benjamin Childs,
7 individually, and Benjamin B. Childs, Esq, the law firm, jointly and severally, in the amount of
8 One Hundred Twenty-Eight Thousand One Hundred Sixty-Six Dollars and Seventy-Eight cents
9 (**\$128,166.78**) and that they pay Defendants the following amounts:

- 10 1. The principal sum of \$118,955.014 in attorneys’ fees;
- 11 2. The principal sum of \$9,211.64 for costs incurred to date; and
- 12 3. Post-judgment interest from the date of the entry of the underlying Order for the
13 attorneys’ fees and costs be granted at the statutory rate of 5.25% per annum.

14 A total Judgment in favor of Defendants, and against Plaintiff, and its former counsel,
15 Benjamin Childs, individually, and Benjamin B. Childs, Esq, the law firm, jointly and severally,
16 in the amount of **\$128,166.78**, all to bear interest at the statutory rate of 5.25% per annum until
17 paid in full.

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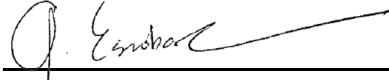
28 ////

MICHAEL B. LEE, P.C.
1820 E. SAHARA AVENUE, SUITE 110
LAS VEGAS, NEVADA 89104
TEL - (702) 477.7030; FAX - (702) 477.0096

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IT IS FURTHER ORDERED, ADJUDICATED, AND DECREED that this Order and Judgment shall be considered a final for all purposes.

Dated this 25th day of May, 2021



C78 3DB 37F8 7A17
Adriana Escobar
District Court Judge.

Date: May 18, 2021.

Respectfully Submitted By:

MICHAEL B. LEE, P.C.

Approved of as to Form and Content By:

DAY & NANCE

/s/ Michael Lee
MICHAEL B. LEE, ESQ. (NSB 10122)
MICHAEL MATTHIS, ESQ. (NSB 14582)
1820 E. Sahara Avenue, Suite 110
Las Vegas, Nevada 89104
Telephone: (702) 477.7030
Facsimile: (702) 477.0096
mike@mblnv.com
Attorneys for Defendants

/s/ Stephen Day
STEPHEN DAY, ESQ. (NSB 3708)
1060 Wigwam Pkwy
Las Vegas, Nevada 89074
Tel - (702) 309.3333
Fax - (702) 309.1085
sday@daynance.com
Attorney for Plaintiff

RE: WLAB v. TKNR, et al.; A-18-785917-C; Proposed Order

From: Steve Day (sday@dayattorneys.com)

To: matthis@mblnv.com

Date: Wednesday, May 19, 2021, 02:20 PM PDT

Looks okay. Okay to use my e-sig. Correct name: Steven L. Day

Steve

Steven L. Day, Esq.

DAY & ASSOCIATES

1060 Wigwam Parkway

Henderson, NV 89074

Tel. (702) 309-3333

Fax (702) 309-1085

Mobile (702) 596-5350

sday@dayattorneys.com

From: Michael Matthis <matthis@mblnv.com>

Sent: Wednesday, May 19, 2021 2:06 PM

To: Steve Day <sday@dayattorneys.com>

Cc: Mike Lee <mike@mblnv.com>

Subject: WLAB v. TKNR, et al.; A-18-785917-C; Proposed Order

Dear Mr. Day,

Please see the attached proposed order denying Plaintiff's Motion to Reconsider and advise if I can affix your e-signature. If not, I have left the proposed order in word and would ask that you track any proposed edits in redline. If we do not receive a response by 3:00 p.m. on Monday, May 24, we will submit absent your signature.

Sincerely,

Mike Matthis, Esq.

matthis@mblnv.com



1820 E. Sahara Avenue, Suite 110, Las Vegas, NV 89104

Main Line: 702.477.7030 Fax: 702.477.0096

CONFIDENTIAL. This e-mail message and the information it contains are intended to be privileged and confidential communications protected from disclosure. Any file(s) or attachment(s) transmitted with it are transmitted based on a reasonable expectation of privacy consistent with ABA Formal Opinion No. 99-413. Any disclosure, distribution, copying, or use of this information by anyone other than the intended recipient, regardless of address or routing, is strictly prohibited. If you have received this e-mail message in error, please notify the sender by e-mail at matthis@mblnv.com and permanently delete this message. Personal messages express only the view of the sender and are not attributable to Michael B. Lee, P.C. **IRS Circular 230 Disclosure:** To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (a) avoiding penalties under the Internal Revenue Code or (b) promoting, marketing, or recommending to another party any transaction or matter addressed herein.

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

4
5
6 W L A B Investment LLC,
Plaintiff(s)

CASE NO: A-18-785917-C

7 vs.

DEPT. NO. Department 14

8
9 TKNR Inc, Defendant(s)

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 5/25/2021

15 Brinley Richeson bricheson@daynance.com

16 Steven Day sday@daynance.com

17 Michael Matthis matthis@mblnv.com

18 Nikita Burdick nburdick@burdicklawnv.com

19 Michael Lee mike@mblnv.com

20 Bradley Marx brad@marxfirm.com

21 Frank Miao frankmiao@yahoo.com