

**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  
Nov 01 2021 12:54 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**PETITIONER'S NOTICE  
OF COMPLIANCE**

Petitioner received the original Writ of Mandamus, copies of the Order Granting Petition and letter of instruction dated October 19, 2021, attached as Exhibit 1. Petitioner complied with the instructions by serving a copy of the Writ of Mandamus and a copy of the Order Granting Petition on Judge Escobra. Petitioner forwarded the original writ with the original affidavit of service [Exhibit 2] to this Court on November 1, 2021 by Priority Mail. See Exhibit 3.

/s/ Benjamin B. Childs

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BENJAMIN B. CHILDS, ESQ.  
Petitioner

#### CERTIFICATE OF MAILING

I hereby certify that on this November 1, 2021, I served this **PETITIONER'S NOTICE OF COMPLIANCE**, with Exhibits, 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

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Benjamin B. Childs  
Nevada Bar No. 3946  
Petitioner

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1



SUPREME COURT OF NEVADA

OFFICE OF THE CLERK

ELIZABETH A. BROWN, CLERK

201 SOUTH DOUGLASS STREET, SUITE 201

CARSON CITY, NEVADA 89701-4702

Telephone  
(775) 684-1600

Benjamin B. Childs  
Attorney at Law  
318 S. Maryland Pkwy.  
Las Vegas, NV 89101

Re: Childs vs. District Court (WLAB INV., LLC)  
Supreme Court Case No. 82967  
District Court Case No. A785917

Dear Mr. Chiles:

Enclosed please find the original and one copy of the Writ of Mandamus and one copy of the Order Granting Petition for service upon Judge Escobar. Please return the original writ with proof of service attached thereto.

Copies of the writ and order are enclosed for your files.

Sincerely,

A handwritten signature in cursive script that reads "Sandra L. Young".

Sandra L. Young  
Deputy Clerk

Enclosures

cc w/enclosures (writ & order):

Michael B. Lee, P.C.  
Day & Nance

21-30077

IN THE SUPREME COURT OF THE STATE OF NEVADA

BENJAMIN B. CHILDS,  
Petitioner,

No. 82967

vs.

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

Respondents,

and

WLAB INVESTMENT, LLC; TKNR,  
INC., A CALIFORNIA CORPORATION;  
CHI ON WONG, A/K/A CHI KUEN  
WONG, AN INDIVIDUAL; KENNY  
ZHONG LIN, A/K/A KEN ZHONG LIN,  
A/K/A KENNETH ZHONG LIN, A/K/A  
WHONG K. LIN, A/K/A CHONG  
KENNY LIN, A/K/A ZHONG LIN, AN  
INDIVIDUAL; LIWE HELEN CHEN,  
A/K/A HELEN CHEN, AN  
INDIVIDUAL; YAN QUI ZHANG, AN  
INDIVIDUAL; INVESTPRO LLC, D/B/A  
INVESTPRO REALTY, A NEVADA  
LIMITED LIABILITY COMPANY; MAN  
CHAU CHENG, AN INDIVIDUAL;  
JOYCE A. NICKRANDT, AN  
INDIVIDUAL; INVESTPRO  
INVESTMENTS LLC, A NEVADA  
LIMITED LIABILITY COMPANY; AND  
INVESTPRO MANAGER LLC, A  
NEVADA LIMITED LIABILITY  
COMPANY; AND JOYCE A.  
NICKDRANDT, AN INDIVIDUAL,  
Real Parties in Interest.

WRIT OF MANDAMUS

TO: The Honorable Adriana Escobar, Judge of the Eighth Judicial District Court:

WHEREAS, this Court having made and filed its written decision that a writ of mandamus issue,

NOW, THEREFORE, you are instructed, in the case entitled WLAB Investment, LLC vs. TKNR Inc, Et Al., case no. A785917, to vacate the portion of your order imposing sanctions against petitioner and to have the underlying district court case reassigned to a different district court judge.

WITNESS The Honorables James Hardesty, Chief Justice, Lidia Stiglich, Associate Justice of the Supreme Court of the State of Nevada, and Mark Gibbons, Senior Justice of the State of Nevada, and attested by my hand and seal this 19th day of September, 2021.

  
Clerk of Court

EXHIBIT 2

EXHIBIT 2

EXHIBIT 2

EXHIBIT 2



# **AFFIDAVIT OF SERVICE**

## **Order Granting Petition, Writ of Mandamus**

Case Number: 82967

Petitioner:

**BENJAMIN B. CHILDS,**

vs.

Defendant:

**THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA,  
IN AND FOR THE COUNTY OF CLARK; et al.,**

For:

Benjamin B. Childs  
318 South Maryland Parkway  
Las Vegas, NV 89101

Received by Legal Express on the 20th day of October, 2021 at 4:30 pm to be served on **The Honorable Adriana Escobar, District Court Department 14.**

I, John Nicholson, being duly sworn, depose and say that on the **28th day of October, 2021 at 3:32 pm, I:**

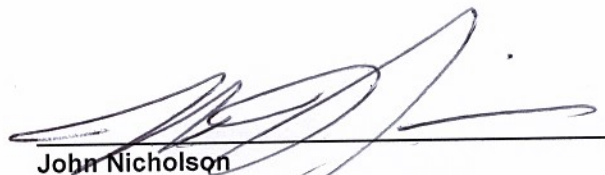
**SERVED** by delivering a true copy of the **Order Granting Petition, Writ of Mandamus to Adrian Viesca as Staff Attorney.**

Said service was made at the address of: **Clark County District Court, Court Administration, 2nd Floor, Las Vegas, NV 89155 .**

Affiant is, and was, a citizen of the United States, over 18 years of age, and not a party to, nor interested in, the proceeding in which this affidavit is made.

Pursuant to NRS 53.045, I declare under penalty of perjury that the foregoing is true and correct.

Executed on **OCTOBER 31, 2021**

  
**John Nicholson**  
Process Server

**Legal Express**  
**Nevada License 999/999a**  
**911 South 1st Street**  
**Las Vegas, NV 89101**  
**(702) 877-0200**  
Our Job Serial Number: 2021000411

Service Fee: \$121.00

EXHIBIT 3

EXHIBIT 3

EXHIBIT 3

EXHIBIT 3

**BENJAMIN B. CHILDS, Sr. ESQ.**

=====

318 S. Maryland Parkway Las Vegas, Nevada 89101

(702) 251-0000

Fax 384-1119

Email : ben@benchilds.com

November 1, 2021

Priority Mail

NEVADA SUPREME COURT

201 South Carson Street # 201

Carson City, Nevada

89701-4702

Re: Childs v, District Court (WLAB Inv., LLC)

Supreme Court Case No. 82967

District Court Case No. A785917

Please find enclosed a copy of the following indicated document(s) as instructed in your letter.

xxx Letter from your office dated October 19, 2021

xxx Original Writ with original Affidavit of Service

**INSTRUCTIONS :**

Sincerely,

/s/ Benjamin B. Childs, Sr. Esq.

Nevada Bar 43946

Enclosure(s)



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