

Electronically Filed  
Jun 14 2021 11:56 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**NOAS**

Steven L. Day, Esq.  
Nevada Bar No. 3708

**DAY & NANCE**

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*Attorneys for Plaintiff*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

W L A B INVESTMENT, LLC,

Plaintiff,

v.

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,

Defendants.

Case No: A-18-785917-C  
Dept No: 14


**NOTICE OF APPEAL**

NOTICE IS HEREBY GIVEN that Plaintiff WLAB INVESTMENT, LLC, hereby  
appeals to the Supreme Court of Nevada from the certain ORDER GRANTING IN PART  
AND DENYING IN PART PLAINTIFF'S MOTION TO RECONSIDER AND JUDGMENT

1 AGAINST PLAINTIFF AND PREVIOUS COUNSEL entered in this action on the 25<sup>th</sup> day of  
2 May, 2021.

3 DATED this 8<sup>th</sup> day of June, 2021.

4 DAY & NANCE

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6 

7 Steven L. Day, Esq.  
8 Nevada Bar No. 3708  
9 1060 Wigwam Parkway  
10 Henderson, NV 89074  
11 *Attorneys for Plaintiff*

12 **CERTIFICATE OF SERVICE**

13 Pursuant to NRCP 5(b), on the 8<sup>th</sup> day of June, 2021, service of this NOTICE OF  
14 APPEAL made upon each of the parties listed below, via electronic service through the  
15 Eighth Judicial District Court's Odyssey E-File and Serve system:

16 Michael B. Lee, Esq.  
17 Michael Mathis, Esq.  
18 Michael B. Lee, P.C.  
19 1820 E. Sahara Ave., Suite 110  
20 Las Vegas, NV 89104  
21 *Attorneys for Defendants*

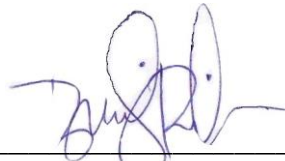
22 Phone: 702-477-7030  
23 mike@mblnv.com  
24 matthis@mblnv.com

25 Fax: 702-477-0096

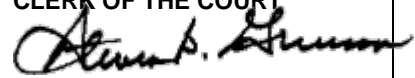
26 Benjamin B. Childs, Esq.  
27 318 S. Maryland Pkwy.  
28 Las Vegas, NV 89101

Phone: 702-251-0000  
ben@benchilds.com

Fax: 702-384-1119



An Employee of Day & Nance



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Steven L. Day, Esq.  
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*Attorneys for Plaintiff*

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

W L A B INVESTMENT, LLC,

Plaintiff,

v.

Case No: A-18-785917-C  
Dept No: 14

**CASE APPEAL STATEMENT**

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,

Defendants.

1. Name of appellant filing this case appeal statement: WLAB INVESTMENT,  
LLC.

2. Identify the judge issuing the decision, judgment or order appealed from:  
Judge Adriana Escobar.

3. Identify each appellant and the name and address of counsel for each appellant: WLAB INVESTMENT, LLC; Steven L. Day, Day & Nance, 1060 Wigwam Parkway, Henderson, NV 89074.

4. Identify each respondent and the name and address of appellate counsel, if known, for each respondent: 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; Respondents' appellant counsel unknown; counsel in District Court action was Michael B. Lee, Esq., 1820 East Sahara Ave., Suite 110, Las Vegas, NV 89104.

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 are licensed to practice law in Nevada.

6. Indicate whether appellant was represented by appointed or retained counsel in the district court: appellant was represented by retained counsel.

7. Indicated whether appellant is represented by appointed or retained counsel on appeal: retained counsel.

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: no.

9. Indicate the date the proceedings commenced in the district court: Complaint filed 12/11/18.

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: The underlying case concerns, among other things, alleged acts of fraud and breach of contract arising out of the sale of real property in Clark County, Nevada. Appellant is appealing from an order denying Appellant's Motion for Reconsideration.


11. Indicate whether the case has previously been the subject of an appeal to or original writ proceeding in the Supreme Court and, if so, the caption and Supreme Court docket number of the prior proceeding: yes

12. Indicate whether this appeal involves child custody or visitation: no.

13. If this is a civil case, indicate whether this appeal involved the possibility of settlement: unknown.

DATED this 8<sup>th</sup> day of June, 2021.

DAY &amp; NANCE

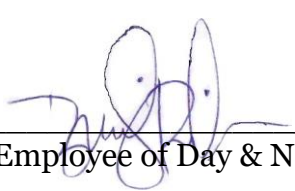
  
Steven L. Day, Esq.  
Nevada Bar No. 3708  
1060 Wigwam Parkway  
Henderson, NV 89074  
Tel. (702) 309-3333  
*Attorneys for Plaintiff*

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), on the 8<sup>th</sup> day of June, 2021, service of this CASE APPEAL  
3 STATEMENT made upon each of the parties listed below, via electronic service through the  
4 Eighth Judicial District Court's Odyssey E-File and Serve system:

5 Michael B. Lee, Esq. Phone: 702-731-0244 Fax: 702-477-0096  
6 Michael N. Matthis, Esq.  
7 Michael B. Lee, P.C. mike@mblnv.com  
8 1820 E. Sahara Ave., Suite 110 matthis@mblnv.com  
9 Las Vegas, NV 89104  
10 *Attorneys for Defendant*

11 Benjamin B. Childs, Esq. Phone: 702-251-0000 Fax: 702-384-1119  
12 318 S. Maryland Pkwy. ben@benchilds.com  
13 Las Vegas, NV 89101

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An Employee of Day & Nance

## EIGHTH JUDICIAL DISTRICT COURT

**CASE SUMMARY****CASE NO. A-18-785917-C**

**W L A B Investment LLC, Plaintiff(s)**  
**vs.**  
**TKNR Inc, Defendant(s)**

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§  
§  
§

Location: **Department 14**  
 Judicial Officer: **Escobar, Adriana**  
 Filed on: **12/11/2018**  
 Cross-Reference Case Number: **A785917**  
 Supreme Court No.: **82835**

**CASE INFORMATION****Statistical Closures**

05/25/2021 Stipulated Judgment  
 04/07/2021 Summary Judgment  
 03/30/2021 Summary Judgment

Case Type: **Other Real Property**

Case Status: **05/25/2021 Closed**

**DATE****CASE ASSIGNMENT****Current Case Assignment**

Case Number A-18-785917-C  
 Court Department 14  
 Date Assigned 12/11/2018  
 Judicial Officer Escobar, Adriana

**PARTY INFORMATION**

		<i>Lead Attorneys</i>
<b>Plaintiff</b>	<b>W L A B Investment LLC</b>	<b>Day, Steven L.</b> <i>Retained</i> 7023093333(W)
<b>Defendant</b>	<b>Chen, Liwe Helen</b>	<b>Lee, Michael B.</b> <i>Retained</i> 702-477-7030(W)
	<b>Cheng, Man Chau</b>	<b>Lee, Michael B.</b> <i>Retained</i> 702-477-7030(W)
	<b>Investpro Investments I LLC</b>	<b>Pierce, Nikita R.</b> <i>Retained</i> 702-481-9207(W)
	<b>Investpro LLC</b>	<b>Lee, Michael B.</b> <i>Retained</i> 702-477-7030(W)
	<b>Investpro Manager LLC</b>	<b>Lee, Michael B.</b> <i>Retained</i> 702-477-7030(W)
	<b>Lin, Zhong Kenny</b>	<b>Lee, Michael B.</b> <i>Retained</i> 702-477-7030(W)
	<b>Nickrandt, Joyce A</b>	<b>Lee, Michael B.</b> <i>Retained</i> 702-477-7030(W)
	<b>Nickrandt, Joyce A.</b> Removed: 03/04/2019 Data Entry Error	
	<b>TKNR Inc</b>	<b>Lee, Michael B.</b> <i>Retained</i>

**CASE SUMMARY****CASE NO. A-18-785917-C**











702-477-7030(W)

**Wong, Chi On****Lee, Michael B.**  
*Retained*

702-477-7030(W)

**Zhang, Yan Qiu****Lee, Michael B.**  
*Retained*













702-477-7030(W)

DATE	EVENTS & ORDERS OF THE COURT	INDEX
	<b><u>EVENTS</u></b>	
12/11/2018	 Complaint Filed By: Plaintiff W L A B Investment LLC <i>Complaint</i>	
12/11/2018	 Summons Electronically Issued - Service Pending Party: Plaintiff W L A B Investment LLC <i>Summons</i>	
12/11/2018	 Initial Appearance Fee Disclosure Filed By: Plaintiff W L A B Investment LLC <i>Initial Appearance Fee Disclosure</i>	
12/26/2018	 Summons Filed by: Plaintiff W L A B Investment LLC <i>Summons</i>	
12/26/2018	 Summons Filed by: Plaintiff W L A B Investment LLC <i>Summons</i>	
12/26/2018	 Summons Filed by: Plaintiff W L A B Investment LLC <i>Summons</i>	
12/26/2018	 Summons Filed by: Plaintiff W L A B Investment LLC <i>Summons</i>	
01/07/2019	 Motion To Dismiss - Alternative Motion For Summary Judgment Filed By: Defendant TKNR Inc; Defendant Wong, Chi On; Defendant Lin, Zhong Kenny; Defendant Investpro LLC; Defendant Nickrandt, Joyce A <i>Defendants Motion to Dismiss, Alternative Motion for More Definite Statement, Alternative Motion for Summary Judgment</i>	
01/09/2019	 Initial Appearance Fee Disclosure Filed By: Defendant Wong, Chi On; Defendant Lin, Zhong Kenny; Defendant Investpro LLC; Defendant Nickrandt, Joyce A <i>Initial Appearance Fee Disclosure</i>	
01/25/2019	 Opposition and Countermotion <i>Opposition To Defendants Motion To Dismiss / Alternative For Summary Judgment / Alternative For A More Definite Statement And Conditional Countermotion For Continuance Based On NRCP 56(F) If The Court Treats Defendant s Motion As One For Summary Judgment</i>	








**CASE SUMMARY**

**CASE NO. A-18-785917-C**

02/04/2019	 Reply to Motion Filed By: Defendant TKNR Inc; Defendant Wong, Chi On; Defendant Lin, Zhong Kenny; Defendant Investpro LLC; Defendant Nickrandt, Joyce A <i>Reply to Defendants Motion to Dismiss</i>
03/04/2019	 Amended Complaint Filed By: Plaintiff W L A B Investment LLC <i>Amedned Complaint</i>
03/19/2019	 Answer Filed By: Defendant TKNR Inc; Defendant Wong, Chi On; Defendant Lin, Zhong Kenny; Defendant Investpro LLC; Defendant Nickrandt, Joyce A; Defendant Chen, Liwe Helen; Defendant Cheng, Man Chau; Defendant Investpro Investments I LLC; Defendant Investpro Manager LLC; Defendant Zhang, Yan Qiu <i>Answer for Defendants</i>
03/29/2019	 Demand for Jury Trial Filed By: Plaintiff W L A B Investment LLC <i>Demand for Jury Trial</i>
04/12/2019	 NRCP 16.1 Disclosure Statement Filed By: Defendant TKNR Inc; Defendant Wong, Chi On; Defendant Lin, Zhong Kenny; Defendant Investpro LLC; Defendant Nickrandt, Joyce A; Defendant Chen, Liwe Helen; Defendant Cheng, Man Chau; Defendant Investpro Investments I LLC; Defendant Investpro Manager LLC; Defendant Zhang, Yan Qiu <i>NRCP 16.1 Disclosure Statement</i>
05/08/2019	 Appointment of Arbitrator <i>Appointment of Arbitrator</i>
05/21/2019	 Notice of Early Arbitration Conference Filed By: Arbitrator Savage, John J. <i>Notice of Early Arbitration Conference</i>
05/30/2019	 Notice of Early Arbitration Conference Filed By: Arbitrator Savage, John J. <i>Notice of Early Arbitration Conference</i>
05/31/2019	 Notice of Early Arbitration Conference Filed By: Arbitrator Savage, John J. <i>Notice of Early Arbitration Conference</i>
06/04/2019	 Joint Request for Exemption Filed by: Plaintiff W L A B Investment LLC <i>JOINT REQUEST FOR EXEMPTION FROM ARBITRATION</i>
06/05/2019	 Joint Request for Exemption Filed by: Plaintiff W L A B Investment LLC <i>JOINT REQUEST FOR EXEMPTION FROM ARBITRATION</i>
06/10/2019	 Arbitration Discovery Order Filed By: Arbitrator Savage, John J. <i>Arbitration Discovery Order</i>

# CASE SUMMARY

CASE NO. A-18-785917-C

06/10/2019	 Notice to Appear for Arbitration Hearing Filed by: Arbitrator Savage, John J. <i>Notice to Appear for Arbitration Hearing</i>
06/20/2019	 Commissioners Decision on Request for Exemption - Granted <i>Commissioner's Decision on Joint Request for Exemption - GRANTED</i>
06/25/2019	 Arbitrators Bill for Fees and Costs Filed By: Arbitrator Savage, John J. <i>Arbitrator's Bill for Fees and Costs</i>
07/11/2019	 Joint Case Conference Report Filed By: Plaintiff W L A B Investment LLC <i>JOINT CASE CONFERENCE REPORT</i>
08/07/2019	 Mandatory Rule 16 Conference Order <i>Mandatory Rule 16 Pre-Trial Scheduling Conference Order</i>
12/02/2019	 Substitution of Attorney <i>Substitution of Attorney for Plaintiff</i>
12/16/2019	 Discovery Scheduling Order <i>Scheduling Order</i>
12/16/2019	 Discovery Scheduling Order <i>Scheduling Order</i>
05/28/2020	 Stipulation and Order to Extend Discovery Deadlines Filed By: Plaintiff W L A B Investment LLC <i>Stipulation and Order to Extend Discovery Deadlines (First Request)</i>
06/16/2020	 Substitution of Attorney Filed by: Plaintiff W L A B Investment LLC <i>SUBSTITUTION OF ATTORNEY</i>
06/26/2020	 Order Setting Civil Jury Trial and Calendar Call <i>Scheduling Order and Order Setting Civil Jury Trial</i>
10/15/2020	 Motion to Extend Discovery Filed By: Defendant TKNR Inc <i>Defendants Motion to Enlarge Discovery (First Request) On an Order Shortening Time</i>
10/16/2020	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
10/19/2020	 Opposition to Motion Filed By: Plaintiff W L A B Investment LLC <i>PLAINTIFF S PARTIAL OPPOSITION TO MOTION TO EXTEND DISCOVERY DEADLINES</i>
10/21/2020	 Clerk's Notice of Nonconforming Document <i>Clerk's Notice of Nonconforming Document</i>
10/22/2020	

# CASE SUMMARY

CASE NO. A-18-785917-C

	 Substitution of Attorney Filed by: Defendant TKNR Inc; Defendant Wong, Chi On; Defendant Lin, Zhong Kenny; Defendant Investpro LLC; Defendant Nickrandt, Joyce A; Defendant Chen, Liwe Helen; Defendant Cheng, Man Chau; Defendant Investpro Investments I LLC; Defendant Investpro Manager LLC; Defendant Zhang, Yan Qiu <i>Substitution of Counsel for Defendants</i>
11/02/2020	 Order <i>ORDER SETTING SETTLEMENT CONFERENCE</i>
11/04/2020	 Order Granting Motion Filed By: Attorney Pierce, Nikita R.; Defendant TKNR Inc; Defendant Wong, Chi On; Defendant Lin, Zhong Kenny; Defendant Investpro LLC; Defendant Nickrandt, Joyce A; Defendant Chen, Liwe Helen; Defendant Cheng, Man Chau; Defendant Investpro Investments I LLC; Defendant Investpro Manager LLC; Defendant Zhang, Yan Qiu <i>Order Granting Defendants Motion to Enlarge Discovery (First Request) on Order Shortening Time</i>
11/11/2020	 Order Shortening Time Filed By: Defendant TKNR Inc; Defendant Lin, Zhong Kenny; Defendant Investpro LLC; Defendant Nickrandt, Joyce A; Defendant Chen, Liwe Helen; Defendant Cheng, Man Chau; Defendant Investpro Investments I LLC; Defendant Investpro Manager LLC <i>Defendants' Motion for leave File Amended Answer Counterclaims, and Third -Party Claims on and Order Shortening Time</i>
11/12/2020	 Exhibits Filed By: Defendant TKNR Inc <i>Exhibits to Defendants Motion for Leave to File Amended Answer, Counterclaims, and Third-Party Claims on an Order Shortening Time</i>
11/16/2020	 Opposition to Motion Filed By: Plaintiff W L A B Investment LLC <i>Limited Opposition to Defendants' Motion to File Amended Answer, Counterclaim and Third-Party Claim</i>
11/17/2020	 Reply to Opposition Filed by: Defendant TKNR Inc <i>Defendants Reply to Limited Opposition to Motion for Leave to File Amended Answer, Counterclaims, and Third-Party Claims on an Order Shortening Time</i>
11/20/2020	 Motion for Leave to File <i>Plaintiff's Motion for Leave to File Second Amended Complaint</i>
11/23/2020	 Stipulation and Order to Amend Filed By: Plaintiff W L A B Investment LLC <i>Stipulation and Order for Leave to File Second Amended Complaint</i>
11/23/2020	 Notice of Entry of Order Filed By: Plaintiff W L A B Investment LLC <i>NOTICE OF ENTRY OF STIPULATION AND ORDER FOR LEAVE TO FILE SECOND AMENDED COMPLAINT</i>
11/23/2020	 Second Amended Complaint Filed By: Plaintiff W L A B Investment LLC <i>Second Amended Complaint</i>

# CASE SUMMARY



CASE NO. A-18-785917-C

11/23/2020	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
12/02/2020	 Order Granting Motion Filed By: Defendant Chen, Liwe Helen; Defendant Cheng, Man Chau <i>Order Granting Defendant's Motion for Leave to File Amended Answer, Counterclaims, and Third Party Claims on Order Shortening Time</i>
12/11/2020	 Order <i>ORDER VACATING SETTLEMENT CONFERENCE</i>
12/15/2020	 Motion for Summary Judgment Filed By: Defendant TKNR Inc <i>Defendants Motion for Summary Judgment, or in the Alternative, Partial Summary Judgment</i>
12/15/2020	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
12/29/2020	 Opposition and Countermotion Filed By: Plaintiff W L A B Investment LLC <i>Opposition to Defendant's Motion for Summary Judgment Countermotion for Continuance Based on NRCP 56(f) and Countermotion for Imposition of Monetary Sanctions</i>
01/06/2021	 Motion to Compel Filed By: Plaintiff W L A B Investment LLC <i>Motion to Compel Discovery and for Imposition of Sanctions</i>
01/06/2021	 Motion for Protective Order Filed By: Defendant TKNR Inc <i>Defendants Motion for a Protective Order and Other Relief</i>
01/07/2021	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
01/07/2021	 Notice of Change of Hearing <i>Notice of Change of Hearing</i>
01/07/2021	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
01/07/2021	 Application Filed By: Defendant TKNR Inc <i>Application for Order Shortening Time on Defendants' Motion for Protective Order and Other Relief</i>
01/08/2021	 Order Shortening Time Filed By: Defendant TKNR Inc; Defendant Lin, Zhong Kenny; Defendant Investpro LLC; Defendant Nickrandt, Joyce A; Defendant Chen, Liwe Helen; Defendant Cheng, Man Chau; Defendant Investpro Investments I LLC; Defendant Investpro Manager LLC <i>Order Shortening Time for Defendants' Motion for Protective Order and Other Relief</i>
01/19/2021	 Opposition to Motion to Compel Filed By: Defendant TKNR Inc <i>Defendants' Opposition to Plaintiff's Motion to Compel Discovery and for Imposition of</i>

# CASE SUMMARY

CASE NO. A-18-785917-C

## Sanctions

01/20/2021	 Opposition to Motion For Protective Order Filed By: Plaintiff W L A B Investment LLC <i>Plaintiff's Opposition to Defendants' Motion For Protective Order and Other Relief</i>
01/21/2021	 Reply to Opposition Filed by: Defendant TKNR Inc <i>Reply to Plaintiff's Opposition to Defendants Motion for Summary Judgment and Opposition to Plaintiff's Countermotions for Continuance based on NRCP 56(f) and for Imposition of Sanctions</i>
01/29/2021	 Supplement Filed by: Defendant TKNR Inc <i>Supplement to Defendants' Motion for Summary Judgment and Opposition to Countermotion for Continuance based on NRCP 56(f) and Countermotion for Imposition of Monetary Sanctions</i>
02/01/2021	 Reply to Opposition Filed by: Defendant TKNR Inc <i>Reply to Opposition to Defendants' Motion for Protective Order</i>
02/10/2021	 Motion to Compel Filed By: Plaintiff W L A B Investment LLC <i>Plaintiff's Renewed Motion to Compel Discovery and for Imposition of Sanctions</i>
02/10/2021	 Application Filed By: Plaintiff W L A B Investment LLC <i>APPLICATION FOR ORDER SHORTENING TIME</i>
02/11/2021	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
02/11/2021	 Motion Filed By: Plaintiff W L A B Investment LLC <i>Motion to Exceed Page Limit for Plaintiff's Renewed Motion to Compel Discovery and for Imposition of Sanctions</i>
02/11/2021	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
02/11/2021	 Order Shortening Time Filed By: Plaintiff W L A B Investment LLC <i>Plaintiff's Motion to Compel Discovery and for Imposition of Sanctions re: Man Chau Cheng - Answers to Interrogatories and Investpro Investments I, LLC - Answers to Interrogatories on Order Shortening Time</i>
02/11/2021	 Order Shortening Time Filed By: Plaintiff W L A B Investment LLC <i>Plaintiff's Motion to Compel Discovery and for Imposition of Sanctions re: TKNR - Request for Production of Documents Chi Wong - Request for Production of Documents Investpro LLC - Request for Production of Documents on Order Shortening Time</i>
02/11/2021	 Order Shortening Time Filed By: Plaintiff W L A B Investment LLC

# CASE SUMMARY

CASE NO. A-18-785917-C

*Plaintiff's Motion to Compel Discovery and for Imposition of Sanctions re: Investpro Manager LLC- Second Request for Production of Documents Investpro Investments I, LLC - Request for Production of Documents on Order Shortening Time*

02/12/2021



Notice of Entry of Order

Filed By: Plaintiff W L A B Investment LLC  
*NOTICE OF ENTRY OF ORDER SHORTENING TIME - PLAINTIFF S MOTION TO COMPEL DISCOVERY AND FOR IMPOSITION OF SANCTIONS re: TKNR - Request for Production of Documents and CHI WONG - Request for Production of Documents and INVESTPRO LLC - Request for Production of Documents.*

02/12/2021



Notice of Entry of Order

Filed By: Plaintiff W L A B Investment LLC  
*NOTICE OF ENTRY OF ORDER re PLAINTIFF S MOTION TO COMPEL DISCOVERY AND FOR IMPOSITION OF SANCTIONS re: INVESTPRO MANAGER LLC- Second Request for Production of Documents and INVESTPRO INVESTMENTS I, LLC - Request for Production of Documents.*

02/12/2021



Notice of Entry of Order

Filed By: Plaintiff W L A B Investment LLC  
*NOTICE OF ENTRY OF ORDER SHORTENING TIME re PLAINTIFF S MOTION TO COMPEL DISCOVERY AND FOR IMPOSITION OF SANCTIONS re: MAN CHAU CHENG - Answers to Interrogatories and INVESTPRO INVESTMENTS I, LLC - Answers to Interrogatories.*

02/16/2021



Reply to Opposition

Filed by: Plaintiff W L A B Investment LLC  
*Plaintiff's Reply to Opposition to Countermotions*

02/18/2021



Opposition and Countermotion

Filed By: Defendant TKNR Inc  
*Opposition to Plaintiff's Motion to Compel and for Imposition of Sanctions and Countermotion for Protective Order or Other Relief*

02/24/2021



Notice

*Notice re: Defendants' Opposition to Plaintiff's Motions to Compel and Countermotion for Protective Order*

02/24/2021



Reply to Opposition

Filed by: Plaintiff W L A B Investment LLC  
*Reply to Opposition to Plaintiff's Motion to Compel Discovery and for Imposition of Sanctions re: Investpro Manager LLC - Second Request for Production of Documents and Investpro Investments I, LLC - Request for Production of Documents and Opposition to Countermotion for Protective Order and Other Relief*

02/24/2021



Reply to Opposition

Filed by: Plaintiff W L A B Investment LLC  
*Reply to Opposition to Plaintiff's Motion to Compel Discovery and for Imposition of Sanctions*

03/04/2021



Supplement

Filed by: Plaintiff W L A B Investment LLC  
*SUPPLEMENT TO PLAINTIFF S REPLY TO OPPOSITION TO COUNTERMOTIONS*

03/04/2021



Motion to Withdraw As Counsel

Filed By: Plaintiff W L A B Investment LLC  
*Benjamin Childs' Motion to Withdraw as Attorney for Plaintiff/Counterdefendant*

# CASE SUMMARY

CASE NO. A-18-785917-C

03/05/2021	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
03/05/2021	 Certificate of Service Filed by: Plaintiff W L A B Investment LLC <i>CERTIFICATE OF SERVICE</i>
03/10/2021	 Substitution of Attorney Filed by: Plaintiff W L A B Investment LLC <i>SUBSTITUTION OF ATTORNEYS</i>
03/30/2021	 Order Filed By: Attorney Pierce, Nikita R.; Defendant TKNR Inc; Defendant Wong, Chi On; Defendant Lin, Zhong Kenny; Defendant Investpro LLC; Defendant Nickrandt, Joyce A; Defendant Chen, Liwe Helen; Defendant Cheng, Man Chau; Defendant Investpro Investments I LLC; Defendant Investpro Manager LLC; Defendant Zhang, Yan Qiu <i>Order Granting Defendants' Motion for Summary Judgment, or in the Alternative, Partial Summary Judgment</i>
03/31/2021	 Notice of Entry of Order Filed By: Defendant TKNR Inc <i>Notice of Entry of Order Granting Defendants Motion for Summary Judgment, or in the Alternative, Partial Summary Judgment</i>
04/06/2021	 Affidavit in Support of Attorney Fees Filed By: Attorney Lee, Michael B.; Attorney Pierce, Nikita R.; Plaintiff W L A B Investment LLC; Defendant TKNR Inc; Defendant Wong, Chi On; Defendant Lin, Zhong Kenny; Defendant Investpro LLC; Defendant Nickrandt, Joyce A; Defendant Chen, Liwe Helen; Defendant Cheng, Man Chau; Defendant Investpro Investments I LLC; Defendant Investpro Manager LLC; Defendant Zhang, Yan Qiu <i>Affidavit in Support of Attorneys Fees for Order Granting Defendants Motion for Summary Judgment, or in the Alternative, Partial Summary Judgment</i>
04/07/2021	 Amended Order Filed By: Defendant TKNR Inc; Defendant Wong, Chi On; Defendant Lin, Zhong Kenny; Defendant Investpro LLC; Defendant Nickrandt, Joyce A; Defendant Chen, Liwe Helen; Defendant Cheng, Man Chau; Defendant Investpro Manager LLC; Defendant Zhang, Yan Qiu <i>Order Granting Defendants' Motion for Summary Judgment, or in the Alternative, Partial Summary Judgment</i>
04/08/2021	 Notice of Entry of Order Filed By: Defendant TKNR Inc <i>Notice of Entry of Amended Order Granting Defendants Motion for Summary Judgment, or in the Alternative, Partial Summary Judgment</i>
04/15/2021	 Recorders Transcript of Hearing Party: Plaintiff W L A B Investment LLC <i>Recorder's Transcript of Hearing Re: All Pending Motions heard 3-11-21</i>
04/16/2021	 Motion to Reconsider Filed By: Plaintiff W L A B Investment LLC <i>Plaintiff's Motion to Reconsider</i>
04/16/2021	 Clerk's Notice of Hearing <i>Notice of Hearing</i>

# CASE SUMMARY

CASE NO. A-18-785917-C

- 04/26/2021  Notice of Appeal  
Filed By: Plaintiff W L A B Investment LLC  
*Notice of Appeal*
- 04/26/2021  Case Appeal Statement  
Filed By: Plaintiff W L A B Investment LLC  
*Case Appeal Statement*
- 04/30/2021  Errata  
Filed By: Defendant TKNR Inc; Defendant Wong, Chi On; Defendant Lin, Zhong Kenny; Defendant Investpro LLC; Defendant Nickrandt, Joyce A; Defendant Chen, Liwe Helen; Defendant Cheng, Man Chau; Defendant Investpro Investments I LLC; Defendant Investpro Manager LLC; Defendant Zhang, Yan Qiu  
*Errata to Defendants' Motion for Summary Judgment, or in the alternative, Partial Summary Judgment*
- 04/30/2021  Opposition to Motion  
Filed By: Defendant TKNR Inc  
*Opposition to Plaintiff's Motion to Reconsider*
- 05/11/2021  Reply to Motion  
Filed By: Plaintiff W L A B Investment LLC  
*Plaintiff's Reply to Defendants' Opposition to Motion for Reconsideration*
- 05/25/2021  Order  
Filed By: Defendant TKNR Inc; Defendant Wong, Chi On; Defendant Lin, Zhong Kenny; Defendant Investpro LLC; Defendant Nickrandt, Joyce A; Defendant Chen, Liwe Helen; Defendant Cheng, Man Chau; Defendant Investpro Investments I LLC; Defendant Investpro Manager LLC; Defendant Zhang, Yan Qiu  
*Order Granting in Part and Denying in Part Plaintiff's Motion for Reconsideration and Judgment Against Plaintiff and previous Counsel*
- 05/25/2021  Notice of Entry of Order  
Filed By: Defendant TKNR Inc  
*Notice of Entry of Order and Judgment*
- 06/07/2021  Declaration  
Filed By: Defendant TKNR Inc  
*Declaration in Support of Recording Judgment*
- 06/08/2021  Notice of Appeal  
Filed By: Plaintiff W L A B Investment LLC  
*Notice of Appeal*
- 06/08/2021  Case Appeal Statement  
Filed By: Plaintiff W L A B Investment LLC  
*Case Appeal Statement*




## **DISPOSITIONS**

- 04/07/2021 **Amended Summary Judgment** (Judicial Officer: Escobar, Adriana)  
Debtors: W L A B Investment LLC (Plaintiff)  
Creditors: TKNR Inc (Defendant), Chi On Wong (Defendant), Zhong Kenny Lin (Defendant), Investpro LLC (Defendant), Joyce A Nickrandt (Defendant), Liwe Helen Chen (Defendant), Man Chau Cheng (Defendant), Investpro Investments I LLC (Defendant), Investpro Manager LLC (Defendant), Yan Qiu Zhang (Defendant)



# CASE SUMMARY

CASE NO. A-18-785917-C

	Judgment: 04/07/2021, Docketed: 03/31/2021 Comment: Certain Claims
05/25/2021	<p><b>Judgment Plus Legal Interest</b> (Judicial Officer: Escobar, Adriana) Debtors: W L A B Investment LLC (Plaintiff), Benjamin B. Childs, ESQ. (Other) Creditors: TKNR Inc (Defendant), Chi On Wong (Defendant), Zhong Kenny Lin (Defendant), Investpro LLC (Defendant), Joyce A Nickrandt (Defendant), Liwe Helen Chen (Defendant), Man Chau Cheng (Defendant), Investpro Investments I LLC (Defendant), Investpro Manager LLC (Defendant), Yan Qiu Zhang (Defendant) Judgment: 05/25/2021, Docketed: 05/26/2021 Total Judgment: 128,166.78 Comment: In Part</p>
	<b>HEARINGS</b>
02/07/2019	<p><b>Motion to Dismiss</b> (9:30 AM) (Judicial Officer: Escobar, Adriana) <i>Defendants Motion to Dismiss, Alternative Motion for More Definite Statement, Alternative Motion for Summary Judgment</i> Granted in Part;</p>
02/07/2019	<p><b>Opposition and Countermotion</b> (9:30 AM) (Judicial Officer: Escobar, Adriana) <i>Opposition To Defendants Motion To Dismiss / Alternative For Summary Judgment / Alternative For A More Definite Statement And Conditional Countermotion For Continuance Based On NRCp 56(F) If The Court Treats Defendant s Motion As One For Summary Judgment</i> Denied;</p>
02/07/2019	<p> <b>All Pending Motions</b> (9:30 AM) (Judicial Officer: Escobar, Adriana) Granted in Part; Journal Entry Details: <i>Mr. Pierce stated he represents the five defendants and the Plaintiff does not allege any false allegations by the licensed broker defendants. Mr. Childs argued that there were permits and inspections required, which were not done. Additionally, electrical, plumbing and natural gas lines were worked on without permits. This work was not disclosed to the buyer, which was fraudulent. Following further arguments by counsel. COURT ORDERED, motion DENIED as to Motion for Summary Judgment and Motion to Dismiss. FURTHER, motion for a more definite statement or amended complaint is GRANTED. Mr. Childs stated this will be filed within fourteen days. The Court advised that once there is Discovery and detail in the amended complaint, defendant may file an amended answer.;</i></p>
10/09/2019	<b>Arbitration Hearing</b> (7:00 AM)
12/12/2019	<p> <b>Mandatory Rule 16 Conference</b> (10:30 AM) (Judicial Officer: Escobar, Adriana) Trial Date Set; Journal Entry Details: <i>This case involves other real property and trial will last five to seven days. The Court informed counsel it will augment time now, and absent extraordinary circumstances, extensions/continuances will not be granted later in the trial. Counsel stated that liability is in dispute and there is intentional misconduct. As no Discovery has been conducted, counsel requested an additional 120 days from the JCCR deadlines. Colloquy regarding settlement. COURT ORDERED, deadlines as follows: Discovery Cut Off, 6/29/20; Amend Pleadings and Add Parties, 4/13/20; Initial Disclosure, 4/13/20; Rebuttal Disclosure, 5/26/20; Dispositive Motions, 7/20/20 and Trial Ready Date 9/28/20. COURT ORDERED, trial date SET and matter set for a status check regarding settlement. 7/30/29 9:30 AM STATUS CHECK: SETTLEMENT 10/29/20 9:30 AM CALENDAR CALL 11/16/20 9:30 AM JURY TRIAL;</i></p>
07/30/2020	<p> <b>Status Check</b> (9:30 AM) (Judicial Officer: Escobar, Adriana) <b>07/30/2020, 10/14/2020, 12/09/2020, 02/03/2021</b> <i>Settlement</i> Matter Continued; Matter Continued; Settlement Matter Continued;</p>

# CASE SUMMARY

CASE NO. A-18-785917-C

Matter Continued;

Journal Entry Details:

*The parties have not settled and are disagreement about how the parties are, and have, conducted discovery. The Court CONTINUES this status check to March 9, at 10:00AM on civil law and motion calendar. CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Dauriana Simpson, to all registered parties for Odyssey File and Serve. 2/10/2021/ds;*

Matter Continued;

Matter Continued; Settlement

Matter Continued;

Matter Continued;

Journal Entry Details:

*The parties have a settlement conference scheduled for January 8, 2021. COURT ORDERED, matter CONTINUED to February 3, 2021, on Chambers Calendar. 2/03/21 3:00 AM STATUS CHECK: SETTLEMENT CLERK'S NOTE: A copy of this minute order was distributed to: Michael Lee, Esq., (mike@mblnv.com), Benjamin Childs, Esq., (ben@benchilds.com) and Nikita Burdick, Esq., (nburdick@burdicklawnv.com).;*

Matter Continued;

Matter Continued; Settlement

Matter Continued;

Matter Continued;

Journal Entry Details:

*This matter has not settled. The Court CONTINUES this matter to Wednesday, December 9, 2020 on Chambers Calendar. \*\*CLERK'S NOTE: This Minute Order has been electronically served to all registered parties for Odyssey File & Serve.;*

Matter Continued;

Matter Continued; Settlement

Matter Continued;

Matter Continued;

Journal Entry Details:

*The Court emailed all parties to confirm the status of settlement progress. No party replied. COURT ORDERED, matter CONTINUED. CONTINUED TO: 10/14/20 IN-CHAMBERS;*

09/02/2020



**Status Check: Settlement/Trial Setting (3:00 AM)** (Judicial Officer: Escobar, Adriana)

Matter Continued;

Journal Entry Details:

*The parties have not responded. This Court CONTINUES this status check to November 4, 2020 on Chambers Calendar. CLERK'S NOTE: The above minute order has been distributed to: Benjamin Childs, Esq. (ben@benchilds.com), and Nikita Pierce (nburdick@burdicklawnv.com) //cbm 09/09/2020;*

10/22/2020



**Minute Order (3:00 AM)** (Judicial Officer: Escobar, Adriana)

Minute Order - No Hearing Held; Defendant Motion to Enlarge Discovery (First Request) on an Order Shortening Time

Journal Entry Details:

*Defendant's Motion to Enlarge Discovery (First Request) on an Order Shortening Time (Motion), which Plaintiff opposed, was set for hearing before Department 14 of the Eighth Judicial District Court, the Honorable Adriana Escobar presiding, on October 22, 2020. Based on the pleadings and arguments of counsel, the Court issues the following order: There is an "inherent power of the judiciary to economically and fairly manage litigation." Borger v. Eighth Judicial Dist. Court, 120 Nev. 1021, 1029 (2004). NRCP 16(b)(4) provides that a scheduling order for trial may be modified by the court for good cause. Further, EDCR 2.35(a) allows requests to extend discovery if in writing and supported by a showing of good cause for the extension and be filed no later than 21 days before the discovery cut-off date or any extension thereof. A request made beyond the period specified above shall not be granted unless the moving party, attorney or other person demonstrates that the failure to act was the result of excusable neglect. (emphasis added). Defendants bring the instant motion due to their failure to make initial expert disclosures by the October 15, 2020, deadline. Pursuant to the scheduling order entered on June 26, 2020, the discovery cut-off date is October 30, 2020. Defendants filed their Motion on October 15, 2020, more than 21 days before the discovery cut-off date. Here, the Court finds that Defendants failure to seek an extension of the discovery deadline in a timely manner was the result of excusable neglect. Moreover, Defendant*

# CASE SUMMARY

CASE NO. A-18-785917-C

*demonstrated good cause warranting this Court to extend discovery, namely that due at least in part the current COVID-19 pandemic, the parties have not conducted any depositions. Additionally, Defendants failed to designate a rebuttal expert due to excusable neglect. Based on the foregoing, the Court GRANTS Defendant's Motion. The Court continues discovery as follows: Amend Pleadings: December 14, 2020 Initial Expert Disclosures: November 30, 2020 Rebuttal Expert: December 4, 2020 Discovery Cut-Off: March 2, 2021 Dispositive Motion: January 25, 2021 Calendar Call: April 1, 2021 Trial Stack: April 19, 2021 Counsel for Defendant is directed to prepare a proposed order based on this Minute Order. Counsel for Plaintiff is to approve as to form and content. All parties must submit their orders electronically, in both PDF version and Word version, until further notice. You may do so by emailing DC14Inbox@clarkcountycourts.us. All orders must have either original signatures from all parties or an email appended as the last page of the proposed order confirming that all parties approved use of their electronic signatures. The subject line of the e-mail should identify the full case number, filing code and case caption. CLERK'S NOTE: This Minute Order has been emailed to Benjamin Childs, Esq. (ben@benchilds.com); Nikita Pierce (nburdick@burdicklawnv.com) and Michael Lee (mike@mblnv.com). /lg;*

10/22/2020



**Motion to Extend Discovery (9:30 AM)** (Judicial Officer: Escobar, Adriana)

*Defendants Motion to Enlarge Discovery (First Request) On an Order Shortening Time Motion Granted;*

Journal Entry Details:

*Appearances continued: Michael Lee, Esq., present on behalf of Defendant and Frank Miao, present on behalf of Plaintiff, Corporation. Mr. Lee advised he will be substituting in on behalf of Defendants. Court directed counsel to file a substitution by the end of today. Ms. Pierce stated she was the current attorney and was present should the Court have any questions. Mr. Lee stated he was seeking a five-month extension. Mr. Childs objected stating his client worked zealously to get his expert witness and they are ready to proceed to trial, noting he contacted Department 30 for dates. Mr. Childs proposed a two-month extension. Court advised the case cannot be settled if there is not enough discovery. Court stated it was its understanding there was an issue for four days in August where the server went down in Ms. Pierce's law firm is why they did not see it. COURT finds good cause and ORDERED, Defendant's Motion GRANTED; Discovery CONTINUED as follows: Discovery Cut-Off: March 2, 2021 Amend Pleadings: December 14, 2020 Initial Expert Disclosures: November 30, 2020 Rebuttal Expert: December 4, 2020 Dispositive Motion: January 25, 2021 Calendar Call: April 1, 2021 Trial Stack: April 19, 2021 Ms. Pierce to prepare Order. Court advised it would issue a more detailed minute order.;*

10/29/2020

**CANCELED Calendar Call (9:31 AM)** (Judicial Officer: Escobar, Adriana)

*Vacated*

11/16/2020

**CANCELED Jury Trial (9:30 AM)** (Judicial Officer: Escobar, Adriana)

*Vacated*

11/18/2020



**Motion for Leave (3:00 AM)** (Judicial Officer: Escobar, Adriana)

*Defendants' Motion for leave File Amended Answer Counterclaims, and Third -Party Claims on and Order Shortening Time*

Minute Order - No Hearing Held;

Journal Entry Details:

*Defendants Motion for Leave to File Amended Answer, Counterclaims, and Third-Party Claims on an Order Shortening Time (Motion), which Plaintiff opposed, was set for Chambers Calendar before Department 14 of the Eighth Judicial District Court, the Honorable Adriana Escobar presiding, on November 18, 2020. After considering the pleadings of counsel, the Court enters the following order: A motion for leave to amend is left to the sound discretion of the trial judge, and the trial judge's decision will not be disturbed absent an abuse of discretion. University & Cmty. Coll. Sys. v. Sutton, 120 Nev. 972, 988 (2004). Under NRCP 15 (a)(2), [t]he court should freely give leave when justice so requires. Motions for leave to amend a pleading ought to be granted unless a strong reason exists not to do so, such as prejudice to the opponent or lack of good faith by the moving party. Nutton v. Sunset Station, Inc., 131 Nev. 279, 284 (Nev. App. 2015); see also Stephens v. S. Nev. Music Co., 89 Nev. 104, 105 06 (1973) ( [I]n the absence of any apparent or declared reason such as undue delay, bad faith or dilatory motive on the part of the movant the leave sought should be freely given. ). Here, Defendants Motion is timely filed as the deadline to amend the pleadings and add parties is December 14, 2020. The Court finds that Defendants should be given leave to amend their complaint. The arguments Plaintiff raises in opposition are meritless. Based on the foregoing,*

# CASE SUMMARY

CASE NO. A-18-785917-C

the Court GRANTS Defendants Motion. Counsel for Defendants is directed to prepare a proposed order approved by Plaintiff as to form and content. All parties must submit their orders electronically, in both PDF version and Word version, until further notice. You may do so by emailing DC14Inbox@clarkcountycourts.us. All orders must have either original signatures from all parties or an email appended as the last page of the proposed order confirming that all parties approved use of their electronic signatures. The subject line of the e-mail should identify the full case number, filing code and case caption. CLERK'S NOTE: The above minute order has been distributed to: Michael Lee Esq., and Michael Matthis Esq., at mike@mblnv.com, Benjamin Childs Esq., at ben@benchilds.com, and Nikita Burdick Esq., at nburdick@burdicklawnv.com. 11/18/20 gs;

01/08/2021	<b>CANCELED Settlement Conference (10:30 AM)</b> Vacated
01/14/2021	<b>CANCELED Motion for Leave (9:30 AM)</b> (Judicial Officer: Escobar, Adriana) Vacated - per Order Plaintiff's Motion for Leave to File Second Amended Complaint
02/09/2021	<b>CANCELED Motion to Compel (9:30 AM)</b> (Judicial Officer: Escobar, Adriana) Vacated Plaintiff / Counterdefendant's Motion to Compel Discovery and for Imposition of Sactions
02/09/2021	<b>CANCELED Motion for Protective Order (9:30 AM)</b> (Judicial Officer: Truman, Erin) Vacated Defendants' Motion for a Protective Order and Other Relief
03/02/2021	 <b>Motion to Compel (10:00 AM)</b> (Judicial Officer: Truman, Erin) Plaintiff's Motion to Compel Discovery and for Imposition of Sanctions re: TKNR - Request for Production of Documents, Chi Wong - Request for Production of Documents and Investpro LLC - Request for Production of Documents on OST Granted in Part; Plaintiff's Motion to Compel Discovery and for Imposition of Sanctions re: TKNR - Request for Production of Documents, Chi Wong - Request for Production of Documents and Investpro LLC - Request for Production of Documents on OST Journal Entry Details:  Frank Maio present. Arguments by counsel. The Motion for Summary Judgment, or in the alternative, Partial Summary Judgment is set 3-11-2021. Commissioner FINDS there was a misunderstanding, and objections will STAND. Discovery closes today. Upon Commissioner's inquiry, Mr. Lee stated there is no Motion pending to extend the discovery deadlines. As the claims currently stand, Commissioner allowed the discovery to go forward. COMMISSIONER RECOMMENDED, motion is GRANTED IN PART and DENIED IN PART; DENIED as to an award of sanctions. TKNR COMMISSIONER RECOMMENDED, RFP 22 supplemental responses are COMPELLED from Deft; RFP 23 is PROTECTED; RFP 24 objection STANDS; RFP 25 identify and produce documents, receipts, and expenses paid for the property during the relevant timeframe; RFP 26 and 27 identify specific bates ranges in 16.1 documents that support Deft's position; RFP 28 is PROTECTED, and limited to communications between TKNR and InvestPro for the subject property from 2015 to 2018; RFP 29 similarly limited for the same time period. CHI WONG COMMISSIONER RECOMMENDED, RFP 1 through 6 communications limited to any and all documents for the subject property from 2015 to 2018; RFP 7 clarify and give bates numbers in Deft's possession, custody, or control; RFP 8 as Directed on the record; RFP 9 is PROTECTED; RFP 10 produce documents relevant to what ownership interest Deft has. INVESTPRO LLC COMMISSIONER RECOMMENDED, RFP 1 repairs, maintenance, or modifications made from August 2015 to July 31, 2018 at the subject property; RFP 2 is more appropriate for an Interrogatory; RFP 2 and 3 are PROTECTED; RFP 4 supplement required; RFP 5 further supplement required; RFP 6 is PROTECTED; RFP 7 is COMPELLED; RFP 8 is limited to allow communications, Contracts, instructions, and agreements (further response is required); RFP 11 is allowed limited to the subject property for the timeframe, to the extent it exists; RFP 12 is COMPELLED, and supplement; RFP 13, 14, 15, 16, 17, and 18 must be supplemented. Commissioner will be as consistent as the Commissioner can be on additional Motions. Commissioner Directed counsel to conduct an additional 2.34 conference to resolve any issues in the upcoming Motions based on the rulings given today. If issues are unresolved, the Motions will remain on calendar. COMMISSIONER RECOMMENDED, Countermotion for Protection is GRANTED IN PART and DENIED IN PART as stated. Mr. Childs to prepare the Report and Recommendations, and Mr. Lee to approve as to form and content. Comply with Administrative Order 20-10, and submit the

# CASE SUMMARY

CASE NO. A-18-785917-C

	<i>DCRR to DiscoveryInbox@clarkcountycourts.us. A proper report must be timely submitted within 14 days of the hearing. Otherwise, counsel will pay a contribution.;</i>
03/04/2021	<b>CANCELED Motion to Compel</b> (9:30 AM) (Judicial Officer: Truman, Erin) <i>Vacated</i> <i>Plaintiff's Motion to Compel Discovery and for Imposition of Sanctions re: Investpro Manager LLC- Second Request for Production of Documents and Investpro Investments I, LLC - Request for Production of Documents on Order Shortening Time</i>
03/11/2021	<b>Motion for Summary Judgment</b> (9:30 AM) (Judicial Officer: Escobar, Adriana) <i>Defendants Motion for Summary Judgment, or in the Alternative, Partial Summary Judgment</i> Granted;
03/11/2021	<b>Opposition and Countermotion</b> (9:30 AM) (Judicial Officer: Escobar, Adriana) <i>Opposition to Defendant's Motion for Summary Judgment Countermotion for Continuance Based on NRCP 56(f) and Countermotion for Imposition of Monetary Sanctions</i> Denied;
03/11/2021	<b>CANCELED Motion to Compel</b> (9:30 AM) (Judicial Officer: Truman, Erin) <i>Vacated</i> <i>Plaintiff's Motion to Compel Discovery and for Imposition of Sanctions re: Man Chau Cheng - Answers to Interrogatories and Investpro Investments I, LLC - Answers to Interrogatories on Order Shortening Time</i>
03/11/2021	 <b>All Pending Motions</b> (9:30 AM) (Judicial Officer: Escobar, Adriana) Matter Heard; Journal Entry Details: <i>DEFENDANTS MOTION FOR SUMMARY JUDGMENT, OR IN THE ALTERNATIVE, PARTIAL SUMMARY JUDGMENT...OPPOSITION TO DEFENDANTS MOTION FOR SUMMARY JUDGMENT COUNTERMOTION FOR CONTINUANCE BASED ON NRCP 56 (F) AND COUNTERMOTION FOR IMPOSITION OF MONETARY SANCTIONS Arguments by counsel regarding the merits and opposition of the Motion. COURT STATED ITS FINDINGS AND ORDERED, motion GRANTED as to all claims and attorney's fees; Countermotion DENIED. Mr. Lee to prepare a detailed order and provide it to opposing counsel for approval as to form and content in both PDF version and Word version to DC14Inbox@clarkcountycourts.us. Pursuant to EDCR 1.90(a)(4), COURT FURTHER ORDERED, Counsel to submit the proposed order within 14 days of this decision.;</i>
03/16/2021	<b>CANCELED Motion to Compel</b> (9:30 AM) (Judicial Officer: Truman, Erin) <i>Vacated</i> <i>Plaintiff's Renewed Motion to Compel Discovery and for Imposition of Sanctions</i>
03/16/2021	<b>CANCELED Motion</b> (10:00 AM) (Judicial Officer: Truman, Erin) <i>Vacated</i> <i>Plaintiff's Motion to Exceed Page Limit for Plaintiff's Renewed Motion to Compel Discovery and for Imposition of Sanctions</i>
03/16/2021	<b>CANCELED Opposition and Countermotion</b> (10:00 AM) (Judicial Officer: Truman, Erin) <i>Vacated</i> <i>Opposition to Plaintiff's Motion to Compel and for Imposition of Sanctions and Countermotion for Protective Order or Other Relief</i>
04/01/2021	<b>CANCELED Calendar Call</b> (3:00 PM) (Judicial Officer: Escobar, Adriana) <i>Vacated - per Stipulation and Order</i>
04/07/2021	 <b>Motion to Withdraw as Counsel</b> (3:00 AM) (Judicial Officer: Escobar, Adriana) <i>Benjamin Childs' Motion to Withdraw as Attorney for Plaintiff/Counterdefendant</i> Motion Granted;
04/08/2021	<b>CANCELED Status Check: Compliance</b> (3:00 AM) (Judicial Officer: Truman, Erin) <i>Vacated - per Stipulation and Order</i>




## CASE SUMMARY

CASE NO. A-18-785917-C

Status Check: Compliance / 3-2-2021 DCRR

04/09/2021 **CANCELED Minute Order** (3:00 AM) (Judicial Officer: Escobar, Adriana)  
*Vacated - On in Error*

04/19/2021 **CANCELED Jury Trial** (9:30 AM) (Judicial Officer: Escobar, Adriana)  
*Vacated - per Stipulation and Order*

05/17/2021  **Minute Order** (3:00 AM) (Judicial Officer: Escobar, Adriana)  
 Minute Order - No Hearing Held;  
 Journal Entry Details:

*Plaintiffs Motion to Reconsider (Motion), which Defendants opposed, was scheduled for hearing before Department XIV of the Eighth Judicial District Court, the Honorable Adriana Escobar presiding, on May 18, 2021. Pursuant to Administrative Order 21-03 and preceding administrative orders, this matter may be decided after a hearing, decided on the pleadings, or continued. In an effort to comply with Covid-19 restrictions, and to avoid the need for hearings when possible, this Court has determined that it would be appropriate to decide this matter based on the pleadings submitted. Upon thorough review of the pleadings, this Court issues the following order: Leave for reconsideration of motions is within this Court's discretion under EDCR 2.24. A district court may reconsider a previously decided issue if substantially different evidence is subsequently introduced or the decision is clearly erroneous. Masonry & Tile Contractors v. Jolley, Urga & Wirth, 113 Nev. 737, 741 (1997). Unless otherwise ordered by the court, papers submitted in support of pretrial and post-trial briefs shall be limited to 30 pages, excluding exhibits. EDCR 2.20(a). Plaintiff seeks reconsideration of this Court's April 7, 2021, Amended Order Granting Defendants Motion for Summary Judgment, or in the Alternative, Partial Summary Judgment. In its opposition, Defendants argue that Plaintiff's Notice of Appeal in this matter divests this Court of jurisdiction to rule on Plaintiff's Motion. This Court disagrees. Because Plaintiff filed a motion for reconsideration, the April 7, 2021, order is not final appealable order. Therefore, the appeal was premature. A premature notice of appeal does NOT divest the district court of jurisdiction. NRAP 4(a)(6). Therefore, this Court has jurisdiction to rule on the Motion. Additionally, Defendants' argument that Plaintiff's Motion was untimely filed lacks merit. Defendants filed the Notice of Entry of Order on April 8, 2021. Therefore, Plaintiff had until April 22, 2021, to file the instant Motion. Plaintiff filed this Motion on April 16, 2021, and thus, the Motion is timely. Before addressing the substantive merits of Plaintiff's Motion, this Court notes that Plaintiff's 179-page Motion includes 40 pages of argument, notwithstanding the exhibits. Although Plaintiff did not seek an order from this Court permitting a longer brief, Court addresses the Motion in full. Plaintiff spends a majority of its Motion rehashing the facts of the underlying dispute. Plaintiff argues that exhibits the Court relied on in granting Defendants underlying motion for summary judgment namely, the Residential Purchase Agreement and the Second Residential Purchase Agreement were not properly authenticated. Plaintiff additionally argues that Defendants discussed an email from Chen to Ms. Zhu without providing a foundation for the email. Plaintiff's argument is that this Court committed clear error by relying on unauthenticated documents, or hearsay, in ruling on Defendants motion for summary judgment. In opposing summary judgment, Plaintiff was required to point to specific facts creating a genuine issue of material fact. LaMantia v. Redisi, 118 Nev. 27, 29 (2002). Plaintiff did not so. Moreover, Defendants were not required to authenticate the first and second Residential Purchase Agreement before this Court could rely on those documents in granting summary judgment. First, Plaintiff did not contest the authenticity of the disputed documents in opposing summary judgment. Second, Plaintiff could have objected that these documents, which were Defendants repeatedly cite to in their motion for summary judgment, cannot be presented in a form that would be admissible in evidence. NRCP 56(b)(2) it did not. Finally, summary judgment is not trial. Authentication is for purposes of introducing evidence at trial. Therefore, this argument lacks merits. Plaintiff has not demonstrated that this Court's ruling was clearly erroneous. Plaintiff additionally argues that Rule 11 sanctions were not warranted and also asks this Court to clarify whether Mr. Day and his firm are to be included in the sanctions. Plaintiff has not demonstrated that this Court's decision to grant Rule 11 sanctions was clearly erroneous. However, this Court does clarify that the sanctions are awarded against Plaintiff's former counsel, Ben Childs, and not Plaintiff's current counsel, Mr. Day. See NRCP 11(c)(1): (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. ). The Court additionally notes the following: Although they do not caption their opposition as a countermotion, Defendants' opposition raise an argument that Rule 11 sanctions are warranted as to Plaintiff's instant Motion. This Court does not find that Rule 11 sanctions are warranted for Plaintiff's filing of this Motion. Defendants also ask that this Court*

EIGHTH JUDICIAL DISTRICT COURT

**CASE SUMMARY**

**CASE NO. A-18-785917-C**

issue an award of attorney fees and costs in the amount of \$128,166.78. In its April 7, 2021, order, this Court granted Defendants attorney fees and costs pursuant to Rule 11. Plaintiff, through its former or new counsel, does not oppose the specific amounts requested. This Court grants the amount Defendants seek. Based on the foregoing, this Court **GRANTS IN PART AND DENIES IN PART** Plaintiff's Motion. This Court does not find that its ruling was clearly erroneous. However, the Court clarifies that the attorney fees and costs is awarded against Plaintiff's former counsel. Counsel for Defendants is directed to prepare a proposed order that incorporates the substance of this minute order and the pleadings. Plaintiff must approve as to form and content. Counsel must submit the proposed order within 14 days of the entry of this minute order. EDCR 1.90(a)(4). All parties must submit their orders electronically, in both PDF version and Word version, until further notice. You may do so by emailing DC14Inbox@clarkcountycourts.us. All orders must have either original signatures from all parties or an email appended as the last page of the proposed order confirming that all parties approved use of their electronic signatures. The subject line of the e-mail should identify the full case number, filing code and case caption. **CLERK S NOTE:** Counsel are to ensure a copy of the forgoing minute order is distributed to all interested parties; additionally, a copy of the foregoing minute order was distributed to the registered service recipients via Odyssey eFileNV E-Service (5-17-21 np).;

05/18/2021

**CANCELED Motion to Reconsider** (10:00 AM) (Judicial Officer: Escobar, Adriana)  
Vacated  
Plaintiff's Motion to Reconsider

**DATE**

**FINANCIAL INFORMATION**

**Defendant** TKNR Inc

Total Charges

766.00

Total Payments and Credits

766.00

**Balance Due as of 6/10/2021**

**0.00**

**Plaintiff** W L A B Investment LLC

Total Charges

609.00

Total Payments and Credits

609.00

**Balance Due as of 6/10/2021**

**0.00**

**Plaintiff** W L A B Investment LLC

Appeal Bond Balance as of 6/10/2021

**1,000.00**

## DISTRICT COURT CIVIL COVER SHEET

A-18-785917-C

Clark

County, Nevada

Case No. \_\_\_\_\_

Department 14

(Assigned by Clerk's Office)

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

Plaintiff(s) (name/address/phone):

W L A B Investment, LLC

Defendant(s) (name/address/phone):

TKNR, INC, a California Corporation, Chi On Wong,

Kenny Zhong Lin, InvestPro, LLC dba Investpro Realty,  
and Joyce Nickrandt

Attorney (name/address/phone):

Benjamin B. Childs

Attorney (name/address/phone):

UNKNOWN

318 S. Maryland Parkway

Las Vegas, NV 89101

702 251 0000

**II. Nature of Controversy** (please select the one most applicable filing type below)**Civil Case Filing Types**

Real Property	Negligence	Torts
<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 checked="" type="checkbox"/> Other Real Property	<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
Probate	Construction Defect & Contract	Judicial Review/Appeal
<b>Probate</b> (select case type and estate value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate <b>Estate Value</b> <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	<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>Judicial Review</b> <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency <b>Nevada State Agency Appeal</b> <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency <b>Appeal Other</b> <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ	Other Civil Filing	
<b>Civil Writ</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>Other Civil Filing</b> <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters	

Business Court filings should be filed using the Business Court civil coversheet.

12/11/2018

Date

/s/ Benjamin B. Childs, Sr.

Signature of initiating party or representative

See other side for family-related case filings.



*Heather S. Hume*  
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](mailto: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

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

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.

18       ////

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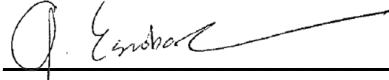
28       ////

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](mailto: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](mailto: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](mailto: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](mailto: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

20 Michael Lee mike@mblnv.com

21 Bradley Marx brad@marxfirm.com

22 Frank Miao frankmiao@yahoo.com

23

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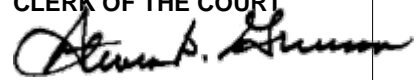
25

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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](mailto: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

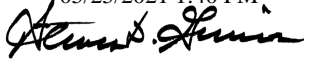
**CERTIFICATE OF MAILING**

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](mailto: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](mailto: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.  
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[mike@mblnv.com](mailto:mike@mblnv.com)  
Attorney for Defendants

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W L A B INVESTMENT, LLC,  
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vs.

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

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

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CHI ON WONG aka CHI KUEN WONG, an  
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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  
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INVESTPRO MANAGER LLC, a Nevada  
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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”)  
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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  
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16 Judgment (“Amended Order”).

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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  
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24 6. Plaintiff spends a majority of its Motion rehashing the facts of the underlying  
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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  
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9 9. Plaintiff did not contest the authenticity of the disputed documents in opposing  
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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  
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14 11. The summary judgment hearing was not a trial. Authentication is for purposes of  
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2 GRANTED, in part, and DENIED, in part, as the Court’s ruling was not clearly erroneous but  
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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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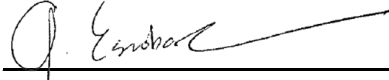
28       ////

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](mailto: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](mailto: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](mailto: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

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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

20 Michael Lee mike@mblnv.com

21 Bradley Marx brad@marxfirm.com

22 Frank Miao frankmiao@yahoo.com

23

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**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Real Property**

**COURT MINUTES**

**February 07, 2019**

---

A-18-785917-C      W L A B Investment LLC, Plaintiff(s)  
vs.  
TKNR Inc, Defendant(s)

---

**February 07, 2019      9:30 AM      All Pending Motions**

**HEARD BY:** Escobar, Adriana      **COURTROOM:** RJC Courtroom 14C

**COURT CLERK:** Denise Husted

**RECORDER:** Sandra Anderson

**REPORTER:**

**PARTIES**

**PRESENT:** Childs, Benjamin B., ESQ      Attorney  
Pierce, Nikita R.      Attorney

**JOURNAL ENTRIES**

- Mr. Pierce stated he represents the five defendants and the Plaintiff does not allege any false allegations by the licensed broker defendants. Mr. Childs argued that there were permits and inspections required, which were not done. Additionally, electrical, plumbing and natural gas lines were worked on without permits. This work was not disclosed to the buyer, which was fraudulent. Following further arguments by counsel. COURT ORDERED, motion DENIED as to Motion for Summary Judgment and Motion to Dismiss. FURTHER, motion for a more definite statement or amended complaint is GRANTED. Mr. Childs stated this will be filed within fourteen days. The Court advised that once there is Discovery and detail in the amended complaint, defendant may file an amended answer.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Real Property**

**COURT MINUTES**

**December 12, 2019**

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A-18-785917-C      W L A B Investment LLC, Plaintiff(s)  
vs.  
TKNR Inc, Defendant(s)

---

**December 12, 2019      10:30 AM      Mandatory Rule 16  
Conference**

**HEARD BY:** Escobar, Adriana

**COURTROOM:** RJC Courtroom 14C

**COURT CLERK:** Denise Husted

**RECORDER:** Sandra Anderson

**REPORTER:**

**PARTIES**

**PRESENT:** Marx, Bradley M.      Attorney  
Pierce, Nikita R.      Attorney

**JOURNAL ENTRIES**

- This case involves other real property and trial will last five to seven days. The Court informed counsel it will augment time now, and absent extraordinary circumstances, extensions/continuances will not be granted later in the trial. Counsel stated that liability is in dispute and there is intentional misconduct. As no Discovery has been conducted, counsel requested an additional 120 days from the JCCR deadlines. Colloquy regarding settlement. COURT ORDERED, deadlines as follows: Discovery Cut Off, 6/29/20; Amend Pleadings and Add Parties, 4/13/20; Initial Disclosure, 4/13/20; Rebuttal Disclosure, 5/26/20; Dispositive Motions, 7/20/20 and Trial Ready Date 9/28/20. COURT ORDERED, trial date SET and matter set for a status check regarding settlement.

7/30/29 9:30 AM STATUS CHECK: SETTLEMENT

10/29/20 9:30 AM CALENDAR CALL

11/16/20 9:30 AM JURY TRIAL

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Real Property**

**COURT MINUTES**

**July 30, 2020**

---

A-18-785917-C      W L A B Investment LLC, Plaintiff(s)  
vs.  
TKNR Inc, Defendant(s)

---

**July 30, 2020      9:30 AM      Status Check**

**HEARD BY:** Escobar, Adriana      **COURTROOM:** RJC Courtroom 14C

**COURT CLERK:** Denise Husted

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- The Court emailed all parties to confirm the status of settlement progress. No party replied. COURT ORDERED, matter CONTINUED.

CONTINUED TO: 10/14/20 IN-CHAMBERS

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Real Property**

**COURT MINUTES**

**September 02, 2020**

---

A-18-785917-C      W L A B Investment LLC, Plaintiff(s)  
vs.  
TKNR Inc, Defendant(s)

---

**September 02, 2020      3:00 AM      Status Check:  
Settlement/Trial Setting**

**HEARD BY:** Escobar, Adriana      **COURTROOM:** Chambers

**COURT CLERK:** Michelle Jones  
Carina Bracamontez-Munguia

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- The parties have not responded. This Court CONTINUES this status check to November 4, 2020 on Chambers Calendar.

CLERK'S NOTE: The above minute order has been distributed to: Benjamin Childs, Esq. (ben@benchilds.com), and Nikita Pierce (nburdick@burdicklawnv.com) // cbm 09/09/2020

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Real Property**

**COURT MINUTES**

**October 14, 2020**

---

A-18-785917-C      W L A B Investment LLC, Plaintiff(s)  
vs.  
TKNR Inc, Defendant(s)

---

**October 14, 2020      3:00 AM      Status Check      Settlement**

**HEARD BY:** Escobar, Adriana      **COURTROOM:** Chambers

**COURT CLERK:** Louisa Garcia

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- This matter has not settled. The Court CONTINUES this matter to Wednesday, December 9, 2020 on Chambers Calendar.

**\*\*CLERK'S NOTE:** This Minute Order has been electronically served to all registered parties for Odyssey File & Serve.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

## Other Real Property

## COURT MINUTES

October 22, 2020

A-18-785917-C      W L A B Investment LLC, Plaintiff(s)  
vs.  
TKNR Inc, Defendant(s)

October 22, 2020	3:00 AM	Minute Order	Defendant Motion to Enlarge Discovery (First Request) on an Order Shortening Time
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**HEARD BY:** Escobar, Adriana

**COURTROOM:** Chambers

**COURT CLERK:** Louisa Garcia

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

## JOURNAL ENTRIES

- Defendant's Motion to Enlarge Discovery (First Request) on an Order Shortening Time (Motion), which Plaintiff opposed, was set for hearing before Department 14 of the Eighth Judicial District Court, the Honorable Adriana Escobar presiding, on October 22, 2020. Based on the pleadings and arguments of counsel, the Court issues the following order:

There is an "inherent power of the judiciary to economically and fairly manage litigation." *Borger v. Eighth Judicial Dist. Court*, 120 Nev. 1021, 1029 (2004). NRCP 16(b)(4) provides that a scheduling order for trial may be modified by the court for good cause.

Further, EDCR 2.35(a) allows requests to extend discovery if in writing and supported by a showing of good cause for the extension and be filed no later than 21 days before the discovery cut-off date or any extension thereof. A request made beyond the period specified above shall not be granted unless the moving party, attorney or other person demonstrates that the failure to act was the result of excusable neglect. (emphasis added).



Defendants bring the instant motion due to their failure to make initial expert disclosures by the October 15, 2020, deadline. Pursuant to the scheduling order entered on June 26, 2020, the discovery cut-off date is October 30, 2020. Defendants filed their Motion on October 15, 2020, more than 21 days before the discovery cut-off date. Here, the Court finds that Defendants' failure to seek an extension of the discovery deadline in a timely manner was the result of excusable neglect. Moreover, Defendant demonstrated good cause warranting this Court to extend discovery, namely that due at least in part the current COVID-19 pandemic, the parties have not conducted any depositions. Additionally, Defendants failed to designate a rebuttal expert due to excusable neglect.

Based on the foregoing, the Court GRANTS Defendant's Motion.

The Court continues discovery as follows:

Amend Pleadings: December 14, 2020  
Initial Expert Disclosures: November 30, 2020  
Rebuttal Expert: December 4, 2020  
Discovery Cut-Off: March 2, 2021  
Dispositive Motion: January 25, 2021  
Calendar Call: April 1, 2021  
Trial Stack: April 19, 2021

Counsel for Defendant is directed to prepare a proposed order based on this Minute Order. Counsel for Plaintiff is to approve as to form and content.

All parties must submit their orders electronically, in both PDF version and Word version, until further notice. You may do so by emailing DC14Inbox@clarkcountycourts.us. All orders must have either original signatures from all parties or an email appended as the last page of the proposed order confirming that all parties approved use of their electronic signatures. The subject line of the e-mail should identify the full case number, filing code and case caption.

CLERK'S NOTE: This Minute Order has been emailed to Benjamin Childs, Esq. (ben@benchilds.com); Nikita Pierce (nburdick@burdicklawnv.com) and Michael Lee (mike@mblnv.com). /lg

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Real Property**

**COURT MINUTES**

**October 22, 2020**

---

A-18-785917-C      W L A B Investment LLC, Plaintiff(s)  
vs.  
TKNR Inc, Defendant(s)

---

**October 22, 2020      9:30 AM      Motion to Extend  
Discovery**

**HEARD BY:** Escobar, Adriana

**COURTROOM:** RJC Courtroom 14C

**COURT CLERK:** Louisa Garcia

**RECORDER:**

**REPORTER:**

**PARTIES**

**PRESENT:** Childs, Benjamin B., ESQ      Attorney  
Pierce, Nikita R.      Attorney

**JOURNAL ENTRIES**

- Appearances continued: Michael Lee, Esq., present on behalf of Defendant and Frank Miao, present on behalf of Plaintiff, Corporation.

Mr. Lee advised he will be substituting in on behalf of Defendants. Court directed counsel to file a substitution by the end of today. Ms. Pierce stated she was the current attorney and was present should the Court have any questions.

Mr. Lee stated he was seeking a five-month extension. Mr. Childs objected stating his client worked zealously to get his expert witness and they are ready to proceed to trial, noting he contacted Department 30 for dates. Mr. Childs proposed a two-month extension. Court advised the case cannot be settled if there is not enough discovery. Court stated it was its understanding there was an issue for four days in August where the server went down in Ms. Pierce's law firm is why they did not see it. COURT finds good cause and ORDERED, Defendant's Motion GRANTED; Discovery CONTINUED as follows:

Discovery Cut-Off: March 2, 2021

Amend Pleadings: December 14, 2020  
Initial Expert Disclosures: November 30, 2020  
Rebuttal Expert: December 4, 2020  
Dispositive Motion: January 25, 2021  
Calendar Call: April 1, 2021  
Trial Stack: April 19, 2021

Ms. Pierce to prepare Order. Court advised it would issue a more detailed minute order.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Real Property**

**COURT MINUTES**

**November 18, 2020**

---

A-18-785917-C      W L A B Investment LLC, Plaintiff(s)  
vs.  
TKNR Inc, Defendant(s)

---

**November 18, 2020      3:00 AM      Motion for Leave**

**HEARD BY:** Escobar, Adriana

**COURTROOM:** RJC Courtroom 14C

**COURT CLERK:** Grecia Snow

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- Defendants Motion for Leave to File Amended Answer, Counterclaims, and Third-Party Claims on an Order Shortening Time (Motion), which Plaintiff opposed, was set for Chambers Calendar before Department 14 of the Eighth Judicial District Court, the Honorable Adriana Escobar presiding, on November 18, 2020. After considering the pleadings of counsel, the Court enters the following order:

A motion for leave to amend is left to the sound discretion of the trial judge, and the trial judge's decision will not be disturbed absent an abuse of discretion. *University & Cmty. Coll. Sys. v. Sutton*, 120 Nev. 972, 988 (2004).

Under NRCP 15(a)(2), [t]he court should freely give leave when justice so requires. Motions for leave to amend a pleading ought to be granted unless a strong reason exists not to do so, such as prejudice to the opponent or lack of good faith by the moving party. *Nutton v. Sunset Station, Inc.*, 131 Nev. 279, 284 (Nev. App. 2015); see also *Stephens v. S. Nev. Music Co.*, 89 Nev. 104, 105 06 (1973) ([I]n the absence of any apparent or declared reason such as undue delay, bad faith or dilatory motive on the part of the movant the leave sought should be freely given. ).

Here, Defendants Motion is timely filed as the deadline to amend the pleadings and add parties is

December 14, 2020. The Court finds that Defendants should be given leave to amend their complaint. The arguments Plaintiff raises in opposition are meritless.

Based on the foregoing, the Court GRANTS Defendants Motion.

Counsel for Defendants is directed to prepare a proposed order approved by Plaintiff as to form and content.

All parties must submit their orders electronically, in both PDF version and Word version, until further notice. You may do so by emailing DC14Inbox@clarkcountycourts.us. All orders must have either original signatures from all parties or an email appended as the last page of the proposed order confirming that all parties approved use of their electronic signatures. The subject line of the e-mail should identify the full case number, filing code and case caption.

CLERK'S NOTE: The above minute order has been distributed to: Michael Lee Esq., and Michael Matthis Esq., at mike@mblnv.com, Benjamin Childs Esq., at ben@benchilds.com, and Nikita Burdick Esq., at nburdick@burdicklawnv.com. 11/18/20 gs

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Real Property**

**COURT MINUTES**

**December 09, 2020**

---

A-18-785917-C      W L A B Investment LLC, Plaintiff(s)  
vs.  
TKNR Inc, Defendant(s)

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**December 09, 2020      3:00 AM      Status Check**

**HEARD BY:** Escobar, Adriana      **COURTROOM:** RJC Courtroom 14C

**COURT CLERK:** Kristen Brown

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- The parties have a settlement conference scheduled for January 8, 2021. COURT ORDERED, matter CONTINUED to February 3, 2021, on Chambers Calendar.

2/03/21 3:00 AM STATUS CHECK: SETTLEMENT

CLERK'S NOTE: A copy of this minute order was distributed to: Michael Lee, Esq., (mike@mblnv.com), Benjamin Childs, Esq., (ben@benchilds.com) and Nikita Burdick, Esq., (nburdick@burdicklawnv.com).

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Real Property**

**COURT MINUTES**

**February 03, 2021**

---

A-18-785917-C      W L A B Investment LLC, Plaintiff(s)  
vs.  
TKNR Inc, Defendant(s)

---

**February 03, 2021      3:00 AM      Status Check**

**HEARD BY:** Escobar, Adriana      **COURTROOM:** Chambers

**COURT CLERK:** Dauriana Simpson

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- The parties have not settled and are disagreement about how the parties are, and have, conducted discovery. The Court CONTINUES this status check to March 9, at 10:00AM on civil law and motion calendar.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Dauriana Simpson, to all registered parties for Odyssey File and Serve. 2/10/2021/ds

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Real Property****COURT MINUTES****March 02, 2021**

A-18-785917-C      W L A B Investment LLC, Plaintiff(s)  
vs.  
TKNR Inc, Defendant(s)

<b>March 02, 2021</b>	<b>10:00 AM</b>	<b>Motion to Compel</b>	<b>Plaintiff's Motion to Compel Discovery and for Imposition of Sanctions re: TKNR - Request for Production of Documents, Chi Wong - Request for Production of Documents and Investpro LLC - Request for Production of Documents on OST</b>
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**HEARD BY:** Truman, Erin**COURTROOM:** RJC Level 5 Hearing Room**COURT CLERK:** Jennifer Lott**RECORDER:** Francesca Haak**REPORTER:****PARTIES**

<b>PRESENT:</b>	Childs, Benjamin B., ESQ	Attorney
	Lee, Michael B.	Attorney

**JOURNAL ENTRIES**

- Frank Maio present.

Arguments by counsel. The Motion for Summary Judgment, or in the alternative, Partial Summary Judgment is set 3-11-2021. Commissioner FINDS there was a misunderstanding, and objections will STAND. Discovery closes today. Upon Commissioner's inquiry, Mr. Lee stated there is no Motion



pending to extend the discovery deadlines. As the claims currently stand, Commissioner allowed the discovery to go forward. COMMISSIONER RECOMMENDED, motion is GRANTED IN PART and DENIED IN PART; DENIED as to an award of sanctions.

TKNR

COMMISSIONER RECOMMENDED, RFP 22 supplemental responses are COMPELLED from Deft; RFP 23 is PROTECTED; RFP 24 objection STANDS; RFP 25 identify and produce documents, receipts, and expenses paid for the property during the relevant timeframe; RFP 26 and 27 identify specific bates ranges in 16.1 documents that support Deft's position; RFP 28 is PROTECTED, and limited to communications between TKNR and InvestPro for the subject property from 2015 to 2018; RFP 29 similarly limited for the same time period.

CHI WONG

COMMISSIONER RECOMMENDED, RFP 1 through 6 communications limited to any and all documents for the subject property from 2015 to 2018; RFP 7 clarify and give bates numbers in Deft's possession, custody, or control; RFP 8 as Directed on the record; RFP 9 is PROTECTED; RFP 10 produce documents relevant to what ownership interest Deft has.

INVESTPRO LLC

COMMISSIONER RECOMMENDED, RFP 1 repairs, maintenance, or modifications made from August 2015 to July 31, 2018 at the subject property; RFP 2 is more appropriate for an Interrogatory; RFP 2 and 3 are PROTECTED; RFP 4 supplement required; RFP 5 further supplement required; RFP 6 is PROTECTED; RFP 7 is COMPELLED; RFP 8 is limited to allow communications, Contracts, instructions, and agreements (further response is required); RFP 11 is allowed limited to the subject property for the timeframe, to the extent it exists; RFP 12 is COMPELLED, and supplement; RFP 13, 14, 15, 16, 17, and 18 must be supplemented.

Commissioner will be as consistent as the Commissioner can be on additional Motions.

Commissioner Directed counsel to conduct an additional 2.34 conference to resolve any issues in the upcoming Motions based on the rulings given today. If issues are unresolved, the Motions will remain on calendar. COMMISSIONER RECOMMENDED, Countermotion for Protection is GRANTED IN PART and DENIED IN PART as stated.

Mr. Childs to prepare the Report and Recommendations, and Mr. Lee to approve as to form and content. Comply with Administrative Order 20-10, and submit the DCRR to [DiscoveryInbox@clarkcountycourts.us](mailto:DiscoveryInbox@clarkcountycourts.us). A proper report must be timely submitted within 14 days of the hearing. Otherwise, counsel will pay a contribution.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Real Property**

**COURT MINUTES**

**March 11, 2021**

---

A-18-785917-C      W L A B Investment LLC, Plaintiff(s)  
vs.  
TKNR Inc, Defendant(s)

---

**March 11, 2021      9:30 AM      All Pending Motions**

**HEARD BY:** Escobar, Adriana      **COURTROOM:** RJC Courtroom 14C

**COURT CLERK:** Grecia Snow

**RECORDER:**

**REPORTER:**

**PARTIES**

**PRESENT:**      Day, Steven L.      Attorney  
Lee, Michael B.      Attorney  
W L A B Investment LLC      Plaintiff

**JOURNAL ENTRIES**

- DEFENDANTS MOTION FOR SUMMARY JUDGMENT, OR IN THE ALTERNATIVE, PARTIAL SUMMARY JUDGMENT...OPPOSITION TO DEFENDANTS MOTION FOR SUMMARY JUDGMENT COUNTERMOTION FOR CONTINUANCE BASED ON NRCP 56(F) AND COUNTERMOTION FOR IMPOSITION OF MONETARY SANCTIONS

Arguments by counsel regarding the merits and opposition of the Motion. COURT STATED ITS FINDINGS AND ORDERED, motion GRANTED as to all claims and attorney's fees; Countermotion DENIED. Mr. Lee to prepare a detailed order and provide it to opposing counsel for approval as to form and content in both PDF version and Word version to DC14Inbox@clarkcountycourts.us. Pursuant to EDCR 1.90(a)(4), COURT FURTHER ORDERED, Counsel to submit the proposed order within 14 days of this decision.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Real Property**

**COURT MINUTES**

**April 07, 2021**

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A-18-785917-C      W L A B Investment LLC, Plaintiff(s)  
vs.  
TKNR Inc, Defendant(s)

---

**April 07, 2021      3:00 AM      Motion to Withdraw as  
Counsel**

**HEARD BY:** Escobar, Adriana      **COURTROOM:** RJC Courtroom 14C

**COURT CLERK:**

**RECORDER:** Sandra Anderson

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- Plaintiff's Counsel's Motion to Withdraw as Attorney for Plaintiff (Motion) came on for Chambers Calendar before Department 14 of the Eighth Judicial District Court, the Honorable Adriana Escobar presiding, on April 7, 2021. Upon thorough review of the pleadings, this Court enters the following order:

Attorney Benjamin B. Childs seeks to withdraw as counsel of record for Plaintiff W L A B Investment, LLC.

On December 15, 2020, Defendants filed their Motion for Summary Judgment, or in the Alternative, Partial Summary Judgment.

On March 4, 2021, Mr. Childs filed a Motion to Withdraw as Counsel for Plaintiff.

On March 10, 2021, Attorney Steven L. Day, Esq. filed a Substitution of Attorneys, substituting himself as counsel of record for Plaintiff in place and stead Mr. Childs.

On March 11, the Court heard Defendants' Motion for Summary Judgment, or in the Alternative,

Partial Summary Judgment. Mr. Day appeared on behalf of Plaintiff.

On March 30, 2021, this Court issued an Order Granting Defendants' Motion for Summary Judgment, or in the Alternative, Partial Summary Judgment.

On April 7, 2021, this Court issued an Amended Order Granting Defendants' Motion for Summary Judgment, or in the Alternative, Partial Summary Judgment, disposing of this matter. In this Order, the Court awarded Defendants attorney fees and costs pursuant to NRCP 11.

For good cause showing pursuant to EDCR 7.40(b)(2), RPC 1.16(b), and SCR 46, this Court hereby GRANTS the Motion.

This Court notes the following: This matter is closed. However, although this Court awarded Defendants attorney fees and costs under NRCP 11, this Court has not made a final determination regarding the amount of attorney fees and costs Defendants are entitled to. Given that Mr. Childs brought the instant action on behalf of Plaintiff, which was the basis of this Court's award of attorney fees and costs under NRCP 11, Mr. Childs is still within the jurisdiction of this Court until this matter is fully resolved. Mr. Childs must be present for remaining motion practice, if any, on this issue, regardless, of the Court's granting of this Motion.

Counsel for Plaintiff is directed to prepare a proposed order that lists all future deadlines and hearings, and includes Plaintiff's last known physical and/or mailing address, email, and phone number.

Counsel must submit the proposed order within 14 days of the entry of this minute order. EDCR 1.90(a)(4).

All parties must submit orders electronically, in both PDF version and Word version, until further notice. You may do so by emailing DC14Inbox@clarkcountycourts.us. All orders must have either original signatures from all parties or an email - appended as the last page of the proposed order - confirming that all parties approved use of their electronic signatures. The subject line of the e-mail should identify the full case number, filing code and case caption.

CLERK'S NOTE: This Minute Order was electronically served to all registered parties for Odyssey File & Serve. /mt

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Real Property**

**COURT MINUTES**

**May 17, 2021**

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A-18-785917-C	W L A B Investment LLC, Plaintiff(s) vs. TKNR Inc, Defendant(s)
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<b>May 17, 2021</b>	<b>3:00 AM</b>	<b>Minute Order</b>
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<b>HEARD BY:</b> Escobar, Adriana	<b>COURTROOM:</b> RJC Courtroom 14C
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**COURT CLERK:** Nylasia Packer

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- Plaintiffs Motion to Reconsider (Motion), which Defendants opposed, was scheduled for hearing before Department XIV of the Eighth Judicial District Court, the Honorable Adriana Escobar presiding, on May 18, 2021. Pursuant to Administrative Order 21-03 and preceding administrative orders, this matter may be decided after a hearing, decided on the pleadings, or continued. In an effort to comply with Covid-19 restrictions, and to avoid the need for hearings when possible, this Court has determined that it would be appropriate to decide this matter based on the pleadings submitted. Upon thorough review of the pleadings, this Court issues the following order:

Leave for reconsideration of motions is within this Court s discretion under EDCR 2.24.

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

Unless otherwise ordered by the court, papers submitted in support of pretrial and post-trial briefs shall be limited to 30 pages, excluding exhibits. EDCR 2.20(a).

Plaintiff seeks reconsideration of this Court s April 7, 2021, Amended Order Granting Defendants

Motion for Summary Judgment, or in the Alternative, Partial Summary Judgment.

In its opposition, Defendants argue that Plaintiff's Notice of Appeal in this matter divests this Court of jurisdiction to rule on Plaintiff's Motion. This Court disagrees. Because Plaintiff filed a motion for reconsideration, the April 7, 2021, order is not final appealable order. Therefore, the appeal was premature. A premature notice of appeal does NOT divest the district court of jurisdiction. NRAP 4(a)(6). Therefore, this Court has jurisdiction to rule on the Motion.

Additionally, Defendants' argument that Plaintiff's Motion was untimely filed lacks merit. Defendants filed the Notice of Entry of Order on April 8, 2021. Therefore, Plaintiff had until April 22, 2021, to file the instant Motion. Plaintiff filed this Motion on April 16, 2021, and thus, the Motion is timely.

Before addressing the substantive merits of Plaintiff's Motion, this Court notes that Plaintiff's 179-page Motion includes 40 pages of argument, notwithstanding the exhibits. Although Plaintiff did not seek an order from this Court permitting a longer brief, Court addresses the Motion in full.

Plaintiff spends a majority of its Motion rehashing the facts of the underlying dispute. Plaintiff argues that exhibits the Court relied on in granting Defendants' underlying motion for summary judgment namely, the Residential Purchase Agreement and the Second Residential Purchase Agreement were not properly authenticated. Plaintiff additionally argues that Defendants discussed an email from Chen to Ms. Zhu without providing a foundation for the email. Plaintiff's argument is that this Court committed clear error by relying on unauthenticated documents, or hearsay, in ruling on Defendants' motion for summary judgment.

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

Moreover, Defendants were not required to authenticate the first and second Residential Purchase Agreement before this Court could rely on those documents in granting summary judgment. First, Plaintiff did not contest the authenticity of the disputed documents in opposing summary judgment. Second, Plaintiff could have objected that these documents, which were Defendants repeatedly cite to in their motion for summary judgment, cannot be presented in a form that would be admissible in evidence. NRCP 56(b)(2) it did not. Finally, summary judgment is not trial. Authentication is for purposes of introducing evidence at trial. Therefore, this argument lacks merits.

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

Plaintiff additionally argues that Rule 11 sanctions were not warranted and also asks this Court to clarify whether Mr. Day and his firm are to be included in the sanctions. Plaintiff has not demonstrated that this Court's decision to grant Rule 11 sanctions was clearly erroneous. However, this Court does clarify that the sanctions are awarded against Plaintiff's former counsel, Ben Childs, and not Plaintiff's current counsel, Mr. Day. See NRCP 11(c)(1): (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. ).

The Court additionally notes the following: Although they do not caption their opposition as a counter motion, Defendants' opposition raise an argument that Rule 11 sanctions are warranted as to Plaintiff's instant Motion. This Court does not find that Rule 11 sanctions are warranted for Plaintiff's filing of this Motion.

Defendants also ask that this Court issue an award of attorney fees and costs in the amount of \$128,166.78. In its April 7, 2021, order, this Court granted Defendants attorney fees and costs pursuant to Rule 11. Plaintiff, through its former or new counsel, does not oppose the specific amounts requested. This Court grants the amount Defendants seek.

Based on the foregoing, this Court GRANTS IN PART AND DENIES IN PART Plaintiff's Motion. This Court does not find that its ruling was clearly erroneous. However, the Court clarifies that the attorney fees and costs is awarded against Plaintiff's former counsel.

Counsel for Defendants is directed to prepare a proposed order that incorporates the substance of this minute order and the pleadings. Plaintiff must approve as to form and content.

Counsel must submit the proposed order within 14 days of the entry of this minute order. EDCR 1.90(a)(4).

All parties must submit their orders electronically, in both PDF version and Word version, until further notice. You may do so by emailing DC14Inbox@clarkcountycourts.us. All orders must have either original signatures from all parties or an email appended as the last page of the proposed order confirming that all parties approved use of their electronic signatures. The subject line of the e-mail should identify the full case number, filing code and case caption.

CLERK'S NOTE: Counsel are to ensure a copy of the foregoing minute order is distributed to all interested parties; additionally, a copy of the foregoing minute order was distributed to the registered service recipients via Odyssey eFileNV E-Service (5-17-21 np).



EIGHTH JUDICIAL DISTRICT COURT CLERK'S OFFICE  
**NOTICE OF DEFICIENCY**  
ON APPEAL TO NEVADA SUPREME COURT

**STEVEN L. DAY, ESQ.**  
**1060 WIGWAM PKWY.**  
**HENDERSON, NV 89074**

**DATE: June 10, 2021**  
**CASE: A-18-785917-C**

**RE CASE:** W L A B INVESTMENTS, LLC vs. 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 INVESTMENTS LLC; INVESTPRO MANAGER LLC

NOTICE OF APPEAL FILED: June 8, 2021

**YOUR APPEAL HAS BEEN SENT TO THE SUPREME COURT.**

PLEASE NOTE: DOCUMENTS **NOT** TRANSMITTED HAVE BEEN MARKED:

- ☒ \$250 – Supreme Court Filing Fee (Make Check Payable to the Supreme Court)\*\*
  - If the \$250 Supreme Court Filing Fee was not submitted along with the original Notice of Appeal, it must be mailed directly to the Supreme Court. The Supreme Court Filing Fee will not be forwarded by this office if submitted after the Notice of Appeal has been filed.
- ☐ \$24 – District Court Filing Fee (Make Check Payable to the District Court)\*\*
- ☐ \$500 – Cost Bond on Appeal (Make Check Payable to the District Court)\*\*
  - NRAP 7: Bond For Costs On Appeal in Civil Cases
  - *Previously paid Bonds are not transferable between appeals without an order of the District Court.*
- ☐ Case Appeal Statement
  - NRAP 3 (a)(1), Form 2
- ☐ Order
- ☐ Notice of Entry of Order

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NEVADA RULES OF APPELLATE PROCEDURE 3 (a) (3) states:

"The district court clerk must file appellant's notice of appeal despite perceived deficiencies in the notice, including the failure to pay the district court or Supreme Court filing fee. **The district court clerk shall apprise appellant of the deficiencies in writing**, and shall transmit the notice of appeal to the Supreme Court in accordance with subdivision (g) of this Rule with a notation to the clerk of the Supreme Court setting forth the deficiencies. Despite any deficiencies in the notice of appeal, the clerk of the Supreme Court shall docket the appeal in accordance with Rule 12."

*Please refer to Rule 3 for an explanation of any possible deficiencies.*

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*\*\*Per District Court Administrative Order 2012-01, in regards to civil litigants, "...all Orders to Appear in Forma Pauperis expire one year from the date of issuance." You must reapply for in Forma Pauperis status.*



# 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, IN PART, AND DENYING, IN PART, PLAINTIFF'S MOTION TO RECONSIDER AND JUDGMENT AGAINST PLAINTIFF AND PREVIOUS COUNSEL; NOTICE OF ENTRY OF ORDER GRANTING, IN PART, AND DENYING , IN PART, PLAINTIFF'S MOTION TO RECONSIDER AND JUDGMENT AGAINST PLAINTIFF AND PREVIOUS COUNSEL; DISTRICT COURT MINUTES; NOTICE OF DEFICIENCY

W L A B INVESTMENTS, LLC,

Plaintiff(s),

vs.

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 INVESTMENTS LLC; INVESTPRO MANAGER LLC,

Defendant(s),

Case No: A-18-785917-C

Dept No: XIV

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 10 day of June 2021.

Steven D. Grierson, Clerk of the Court



Amanda Hampton, Deputy Clerk