

IN THE SUPREME COURT OF THE STATE OF NEVADA

INDICATE FULL CAPTION:

TON VINH LEE,
Plaintiff,

v.

INGRID PATIN, an individual, and PATIN
LAW GROUP PLLC, a Nevada Professional
LLC,
Defendants,

No. 83213

DOCKETING STATEMENT CIVIL APPEALS

Electronically Filed
Aug 4 2021 11:03 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

GENERAL INFORMATION

Appellants must complete this docketing statement in compliance with NRAP 14(a). The purpose of the docketing statement is to assist the Supreme Court in screening jurisdiction, identifying issues on appeal, assessing presumptive assignment to the Court of Appeals under NRAP 17, scheduling cases for oral argument and settlement conferences, classifying cases for expedited treatment and assignment to the Court of Appeals, and compiling statistical information.

WARNING

This statement must be completed fully, accurately and on time. NRAP 14(c). The Supreme Court may impose sanctions on counsel or appellant if it appears that the information provided is incomplete or inaccurate. *Id.* Failure to fill out the statement completely or to file it in a timely manner constitutes grounds for the imposition of sanctions, including a fine and/or dismissal of the appeal.

A complete list of the documents that must be attached appears as Question 27 on this docketing statement. Failure to attach all required documents will result in the delay of your appeal and may result in the imposition of sanctions.

This court has noted that when attorneys do not take seriously their obligations under NRAP 14 to complete the docketing statement properly and conscientiously, they waste the valuable judicial resources of this court, making the imposition of sanctions appropriate. See KDI Sylvan Pools v. Workman, 107 Nev. 340, 344, 810 P.2d 1217, 1220 (1991). Please use tab dividers to separate any attached documents.

1. Judicial District Eighth Department 26
County Clark Judge Gloria Sturman
District Ct. Case No. A-15-723134

2. Attorney filing this docketing statement:

Attorney Prescott T. Jones, Esq. Telephone 702-997-1029
Firm Resnick & Louis, P.C.
Address 8925 W. Russell Rd., Ste. 220
Las Vegas, NV 89148

Client(s) Ton Vinh Lee

If this is a joint statement by multiple appellants, add the names and addresses of other counsel and the names of their clients on an additional sheet accompanied by a certification that they concur in the filing of this statement.

3. Attorney(s) representing respondents(s):

Attorney Christian Morris, Esq. Telephone 702-434-8282
Firm Nettles Morris
Address 1389 Galleria Drive, Suite 200
Henderson, NV 89014

Client(s) Ingrid Patin

Attorney Kerry Doyle, Esq. Telephone 702-706-3323
Firm Doyle Law Group, LLC
Address 7375 S. Pecos Road, Suite 101
Las Vegas, NV 89120

Client(s) Patin Law Group, PLLC

(List additional counsel on separate sheet if necessary)

4. Nature of disposition below (check all that apply):

- | | |
|---|---|
| <input type="checkbox"/> Judgment after bench trial | <input type="checkbox"/> Dismissal: |
| <input type="checkbox"/> Judgment after jury verdict | <input type="checkbox"/> Lack of jurisdiction |
| <input type="checkbox"/> Summary judgment | <input type="checkbox"/> Failure to state a claim |
| <input type="checkbox"/> Default judgment | <input type="checkbox"/> Failure to prosecute |
| <input type="checkbox"/> Grant/Denial of NRCP 60(b) relief | <input type="checkbox"/> Other (specify): _____ |
| <input type="checkbox"/> Grant/Denial of injunction | <input type="checkbox"/> Divorce Decree: |
| <input type="checkbox"/> Grant/Denial of declaratory relief | <input type="checkbox"/> Original <input type="checkbox"/> Modification |
| <input type="checkbox"/> Review of agency determination | <input checked="" type="checkbox"/> Other disposition (specify): <u>Grant of Fees/Costs</u> |

5. Does this appeal raise issues concerning any of the following?

- ☐ Child Custody
- ☐ Venue
- ☐ Termination of parental rights

6. Pending and prior proceedings in this court. List the case name and docket number of all appeals or original proceedings presently or previously pending before this court which are related to this appeal:

Patin v. Lee - 69928
Patin v. Lee - 72144
Patin v. Lee - 82516

7. Pending and prior proceedings in other courts. List the case name, number and court of all pending and prior proceedings in other courts which are related to this appeal (e.g., bankruptcy, consolidated or bifurcated proceedings) and their dates of disposition:
n/a

8. Nature of the action. Briefly describe the nature of the action and the result below:

This appeal is taken from the District Court's award for attorney fees and costs in a civil action for defamation per se brought by Plaintiff Ton Vinh Lee, a dentist, against Defendants Ingrid Patin and Patin Law Group. On October 28, 2020, the District Court granted Defendant Ingrid Patin's Motion for Judgment on the Pleadings, or in the Alternative, Summary Judgment, which was joined by Defendant Patin Law Group, PLLC. On November 29, 2020, Defendant Ingrid Patin filed her Motion for Attorneys' Fees, Costs, and Interest pursuant to NRS 18.020(3) and NRCP 68. Defendant Patin Law Group filed its Motion for Attorneys' Fees and Interest pursuant to NRCP 68 on the same day. On April 23, 2021, the District Court issued its Notice of Entry of Decision and Order granting the Defendants' motions, finding that Defendants were entitled to fee and costs pursuant to NRCP 68. . On May 7, 2021, Plaintiff filed his Motion for Reconsideration, or in the alternative, Motion to Alter/Amend Judgment Pursuant to NRCP 59(e). On June 11, 2021, the Court filed its Notice of Entry of Order denying the Motion for Reconsideration. Plaintiff now appeals the District Court's April 23, 2021, Order.

9. Issues on appeal. State concisely the principal issue(s) in this appeal (attach separate sheets as necessary):

1. Whether the District Court Failed to Apply the Complete Analysis for Awarding Fees and Costs Pursuant to NRCP 68(g) Prior to Awarding Defendants' Fees and Costs Pursuant to NRCP 68(g)
2. Whether the District Court is Required to Apply the Full Analysis Pursuant to NRCP 68 (g) Prior to Awarding Defendants' Fees and Costs Pursuant to NRCP 68(g)
3. Whether the District Court Erred in awarding Defendants' Fees and Costs Pursuant to NRCP 68 Because The District Court Failed to Apply the Full Analysis Pursuant to NRCP 68(g)

10. Pending proceedings in this court raising the same or similar issues. If you are aware of any proceedings presently pending before this court which raises the same or similar issues raised in this appeal, list the case name and docket numbers and identify the same or similar issue raised:

None known.

11. Constitutional issues. If this appeal challenges the constitutionality of a statute, and the state, any state agency, or any officer or employee thereof is not a party to this appeal, have you notified the clerk of this court and the attorney general in accordance with NRAP 44 and NRS 30.130?

☒ N/A

☐ Yes

☐ No

If not, explain:

12. Other issues. Does this appeal involve any of the following issues?

☐ Reversal of well-settled Nevada precedent (identify the case(s))

☐ An issue arising under the United States and/or Nevada Constitutions

☐ A substantial issue of first impression

☐ An issue of public policy

☐ An issue where en banc consideration is necessary to maintain uniformity of this court's decisions

☐ A ballot question

If so, explain:

13. Assignment to the Court of Appeals or retention in the Supreme Court. Briefly set forth whether the matter is presumptively retained by the Supreme Court or assigned to the Court of Appeals under NRAP 17, and cite the subparagraph(s) of the Rule under which the matter falls. If appellant believes that the Supreme Court should retain the case despite its presumptive assignment to the Court of Appeals, identify the specific issue(s) or circumstance(s) that warrant retaining the case, and include an explanation of their importance or significance:

This case does not fall under any of the categories of NRAP 17(a) or (b).

14. Trial. If this action proceeded to trial, how many days did the trial last? _____

Was it a bench or jury trial? N/A

15. Judicial Disqualification. Do you intend to file a motion to disqualify or have a justice recuse him/herself from participation in this appeal? If so, which Justice?
No.

TIMELINESS OF NOTICE OF APPEAL

16. Date of entry of written judgment or order appealed from April 23, 2021

If no written judgment or order was filed in the district court, explain the basis for seeking appellate review:

17. Date written notice of entry of judgment or order was served April 23, 2021

Was service by:

☐ Delivery

☒ Mail/electronic/fax

18. If the time for filing the notice of appeal was tolled by a post-judgment motion (NRCP 50(b), 52(b), or 59)

(a) Specify the type of motion, the date and method of service of the motion, and the date of filing.

☐ NRCP 50(b) Date of filing _____

☐ NRCP 52(b) Date of filing _____

☒ NRCP 59 Date of filing May 7, 2021

NOTE: Motions made pursuant to NRCP 60 or motions for rehearing or reconsideration may toll the time for filing a notice of appeal. See *AA Primo Builders v. Washington*, 126 Nev. ___, 245 P.3d 1190 (2010).

(b) Date of entry of written order resolving tolling motion June 11, 2021

(c) Date written notice of entry of order resolving tolling motion was served June 11, 20

Was service by:

☐ Delivery

☒ Mail

19. Date notice of appeal filed 7/8/2021

If more than one party has appealed from the judgment or order, list the date each notice of appeal was filed and identify by name the party filing the notice of appeal:

20. Specify statute or rule governing the time limit for filing the notice of appeal, e.g., NRAP 4(a) or other

NRAP 4(a)(4)(C)

SUBSTANTIVE APPEALABILITY

21. Specify the statute or other authority granting this court jurisdiction to review the judgment or order appealed from:

(a)

- | | |
|--|---------------------------------------|
| <input type="checkbox"/> NRAP 3A(b)(1) | <input type="checkbox"/> NRS 38.205 |
| <input type="checkbox"/> NRAP 3A(b)(2) | <input type="checkbox"/> NRS 233B.150 |
| <input type="checkbox"/> NRAP 3A(b)(3) | <input type="checkbox"/> NRS 703.376 |
| <input checked="" type="checkbox"/> Other (specify) <u>NRAP 3A(b)(8)</u> | |
-

(b) Explain how each authority provides a basis for appeal from the judgment or order:
The challenged Order Granting Defendants' Motions for Attorney Fees and Costs is an order issued after the Court's final judgment.

22. List all parties involved in the action or consolidated actions in the district court:

(a) Parties:

Plaintiff - Ton Vinh Lee

Defendant - Ingrid Patin

Defendant - Patin Law Group PLLC

(b) If all parties in the district court are not parties to this appeal, explain in detail why those parties are not involved in this appeal, *e.g.*, formally dismissed, not served, or other:

23. Give a brief description (3 to 5 words) of each party's separate claims, counterclaims, cross-claims, or third-party claims and the date of formal disposition of each claim.

Plaintiff - defamation per se (Order Granting Defendant's Motion for Summary Judgment entered on 10/30/2020)

Defendant Ingrid Patin: Attorney Fees, Costs, and Interest (Order Granting Motion for Attorney Fees, Costs, and Interest entered on April 23, 2021)

Defendant Patin Law Group PLLC: Attorney Fees and Interest (Order Granting Motion for Attorney Fees and Interest entered on April 23, 2021)

24. Did the judgment or order appealed from adjudicate ALL the claims alleged below and the rights and liabilities of ALL the parties to the action or consolidated actions below?

☐ Yes

☒ No

25. If you answered "No" to question 24, complete the following:

(a) Specify the claims remaining pending below:

The Order appealed from gave the determination of Defendants' post-judgment motions for attorney fees, costs, and interest.

The District Court entered its Order Granting Defendant's Motion for Summary Judgment on 10/30/2020, which Plaintiff has appealed. The appeal is pending as Case No. 82516.

(b) Specify the parties remaining below:
N/A

(c) Did the district court certify the judgment or order appealed from as a final judgment pursuant to NRCP 54(b)?

☐ Yes

☒ No

(d) Did the district court make an express determination, pursuant to NRCP 54(b), that there is no just reason for delay and an express direction for the entry of judgment?

☐ Yes

☒ No

26. If you answered "No" to any part of question 25, explain the basis for seeking appellate review (e.g., order is independently appealable under NRAP 3A(b)):
Order is appealable under NRAP 3A(b)(8).

27. Attach file-stamped copies of the following documents:

- The latest-filed complaint, counterclaims, cross-claims, and third-party claims
- Any tolling motion(s) and order(s) resolving tolling motion(s)
- Orders of NRCP 41(a) dismissals formally resolving each claim, counterclaims, cross-claims and/or third-party claims asserted in the action or consolidated action below, even if not at issue on appeal
- Any other order challenged on appeal
- Notices of entry for each attached order

VERIFICATION

I declare under penalty of perjury that I have read this docketing statement, that the information provided in this docketing statement is true and complete to the best of my knowledge, information and belief, and that I have attached all required documents to this docketing statement.

Ton Vinh Lee
Name of appellant

Prescott T. Jones, Esq.
Name of counsel of record

Mar 16, 2021
Date

/s/ Prescott T. Jones
Signature of counsel of record

Nevada, Clark County
State and county where signed

CERTIFICATE OF SERVICE

I certify that on the 4th day of August, 2021, I served a copy of this completed docketing statement upon all counsel of record:

☐ By personally serving it upon him/her; or

☒ By mailing it by first class mail with sufficient postage prepaid to the following address(es): (NOTE: If all names and addresses cannot fit below, please list names below and attach a separate sheet with the addresses.)

Christian M. Morris, Esq.
NETTLES MORRIS
1389 Galleria Dr., Suite 200
Henderson, NV 89014
Attorney for Defendant Ingrid Patin

Kerry J. Doyle, Esq.
DOYLE LAW GROUP
7375 S. Pecos Rd., #101
Las Vegas, NV 89120
Attorney for Defendant Patin Law Group, PLLC

Dated this 4th day of August, 2021

Susan Carbone
Signature


CLERK OF THE COURT

SACOM
PRESCOTT T. JONES, ESQ.
Nevada State Bar No. 11617
AUGUST B. HOTCHKIN, ESQ.
Nevada State Bar No. 12780
BREMER WHYTE BROWN & O'MEARA LLP
1160 N. TOWN CENTER DRIVE
SUITE 250
LAS VEGAS, NV 89144
TELEPHONE: (702) 258-6665
FACSIMILE: (702) 258-6662
pjones@bremerwhyte.com
ahotchkin@bremerwhyte.com
Attorneys for Plaintiff,
TON VINH LEE

DISTRICT COURT
CLARK COUNTY; NEVADA

TON VINH LEE, an individual)	Case No.: A723134
)	
Plaintiff,)	Dept. No.: IX
vs.)	
)	SECOND AMENDED COMPLAINT
INGRID PATIN, an individual, and PATIN)	
LAW GROUP, PLLC, a Nevada Professional)	
LLC,)	
)	
Defendants.)	

COMES NOW, Plaintiff TON VINH LEE (hereinafter "Plaintiff"), by and through his attorneys of record, Prescott T. Jones, Esq. and August B Hotchkin, Esq. of the law firm BREMER, WHYTE, BROWN & O'MEARA, LLP, and hereby complains and alleges as follows:

I.

PARTIES

1. Plaintiff is, and at all times relevant herein, was a resident of Clark County, Nevada.
2. The actions complained of herein occurred in Clark County, Nevada.
3. Plaintiff, TON VINH LEE (hereinafter "Plaintiff") is a Doctor of Dental Surgery (DDS), and owner of Ton V. Lee, DDS, P.C., d/b/a Summerlin Smiles located at 9525 West Russell Rd. Suite 100, Las Vegas, NV 89148.
4. Plaintiff is informed, believes, and thereupon alleges, Defendant INGRID PATIN,

1 ESQ. is, and was at all relevant times, a practicing attorney in the State of Nevada, and the sole
2 managing member of PATIN LAW GROUP, PLLC.

3 5. Plaintiff is informed, believes, and thereupon alleges, Defendant PATIN LAW
4 GROUP, PLLC is a Nevada Professional Limited Liability Company licensed to do business in
5 Clark County, Nevada.

6 6. Defendants, and each of them, were the handling attorney and/or handling law firm
7 in *Svetlana Singletary v. Ton Lee, DDS*, Case Number A-12-656091-C.

8 II.

9 GENERAL ALLEGATIONS

10 7. Plaintiff incorporates herein by reference the preceding paragraphs, inclusive, as
11 though fully set forth herein.

12 8. On or about February 7, 2012, Svetlana Singletary, Gabriel Singletary, Gabriel I
13 Singletary, and the Estate of Reginald Singletary filed suit against, *inter alia*, TON VINH LEE for
14 various causes of action arising out of the death of Reginald Singletary, in Case Number A-12-
15 656091-C.

16 9. On September 10, 2014, a Judgement on Jury Verdict was entered in favor of
17 Defendant TON VINH LEE, in which TON VINH LEE was also awarded his cost in the amount of
18 Six Thousand Thirty-Two Dollars and Eighty-Three Cents (\$6,032.83), as the prevailing party
19 under NRS 18.020.

20 10. Despite the Judgment entered, Defendants lists on their website, PatinLaw.com,
21 under a section entitled "Recent Settlements and Verdicts," a Plaintiff's Verdict in the amount of
22 \$3.4M for *Svetlana Singletary v. Ton Lee, DDS* wherein it explicitly refers to Plaintiff Ton Vinh
23 Lee by name.

24 11. Nevada Rules of Professional Conduct, Rule 7.2, requires any statement made by an
25 attorney that includes a monetary sum, the amount involved must have been actually received by
26 the client.

27 12. Defendant INGRID PATIN by and through PATIN LAW GROUP PLLC added this
28 statement to her website for her own personal gain.

13. Defendant INGRID PATIN personally participated in the tortious act of making a defamatory statement.

14. Plaintiff is informed, believes, and thereupon alleges, that at all relevant times Defendant INGRID PATIN, ESQ. influenced and governed PATIN LAW GROUP, PLLC by unilaterally dictating the form and content of its website for the purposes of advertisement and to bolster her reputation by and through publishing a defamatory statement.

15. Plaintiff is informed, believes, and thereupon alleges, that at all relevant times Defendant PATIN LAW GROUP, PLLC was controlled by Defendant INGRID PATIN, ESQ. who is the sole owner and manager of PATIN LAW GROUP, PLLC.

16. Plaintiff has been forced to retain the services of an attorney to prosecute this matter and is entitled to recover reasonable costs and attorneys' fees incurred herein.

FIRST CLAIM FOR RELIEF

Defamation Per Se

17. Plaintiff incorporates herein by reference the preceding paragraphs, inclusive, as though fully set forth herein.

18. Defendants posted a false and defamatory statement on the "Recent Settlements and Verdicts" portion of their business website, PatinLaw.com.

19. The defamatory statement directly names both the Plaintiff and his Medical Practice.

20. The defamatory statement lists the case name, *Singletary v. Ton Vinh Lee, DDS, et al.*, as well as a detailed description of the case: "A dental malpractice-based wrongful death action that arose out of the death of Decedent Reginald Singletary following the extraction of the No. 32 wisdom tooth by Defendants on or about April 16, 2011. Plaintiff sued the dental office, Summerlin Smiles, the owner, Ton Vinh Lee, DDS, and the treating dentists, Florida Traivai, DMD and Jai Park, DDS, on behalf of the Estate, herself and minor son."

21. Defendants have posted this statement on their website, which constitutes an unprivileged publication to a third person.

22. Defendants knew or should have known that the statement was false.

23. Nevada Rules of Professional Conduct, Rule 7.2, prohibit attorneys from advertising

1 verdicts or recoveries that were not actually received or won.

2 24. The defamatory statement imputes to TON VINH LEE a lack of fitness as a dentist
3 in that it claims Plaintiffs were able to recover a \$3.4 million judgment for wrongful death.

4 25. The defamatory statement injures TON VINH LEE in his business as a simple
5 internet search reveals the claimed verdict for wrongful death.

6 WHEREFORE, Plaintiff expressly reserving the right to amend this complaint prior to or at
7 the time of trial of this action, to insert those items of damage not yet fully ascertainable, prays
8 judgement against all Defendants, and each of them, as follows:

- 9 1. For general damages in excess of \$10,000.00.
10 2. For reasonable attorney's fees and costs
11 3. For pre- and post-judgement interest on any award rendered herein; and
12 4. For such other and further relief as the Court deems just and proper

13 Dated: April 11, 2016

BREMER WHYTE BROWN & O'MEARA LLP

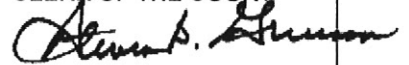
14
15 By: 

16 Prescott T. Jones, Esq.
17 Nevada State Bar No. 11617
18 August B. Hotchkin, Esq.
19 Nevada State Bar No. 12780
20 Attorneys for Plaintiff,
21 TON VINH LEE
22
23
24
25
26
27
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
20
21
22
23
24
25
26
27
28



1 **RESNICK & LOUIS, P.C.**
2 **PRESCOTT JONES**
3 Nevada Bar No. 11617
4 pjones@rlattorneys.com
5 **MYRALEIGH A. ALBERTO**
6 Nevada Bar No. 14340
7 malberto@rlattorneys.com
8 8925 W. Russell Road, Suite 220
9 Las Vegas, Nevada 89148
10 Telephone: (702) 997-3800
11 Facsimile: (702) 997-3800
12 *Attorneys for Plaintiff,*
13 *Ton Vinh Lee*

9
10 **DISTRICT COURT**
11 **CLARK COUNTY, NEVADA**

12
13 TON VINH LEE,

14 Plaintiff,

15 v.

16 INGRID PATIN, an individual, and PATIN
17 LAW GROUP, PLLC, a Nevada Professional
18 LLC,

19 Defendants.

CASE NO.: A-15-723134-C

DEPT: 26

**PLAINTIFF TON VINH LEE'S
MOTION FOR RECONSIDERATION,
or in the alternative, MOTION TO
ALTER OR AMEND JUDGMENT
PURSUANT TO NRCP 59(e)**

(HEARING REQUESTED)

20
21 PLAINTIFF TON VINH LEE, by and through his counsel of record, Prescott T. Jones,
22 Esq. and Myraleigh A. Alberto, Esq. of the law firm of Resnick and Louis, P.C., hereby submits
23 this Motion for Reconsideration, or in the alternative, Motion to Alter or Amend Judgment
24 Pursuant to NRCP 59(e) ("Motion").

25 ///

26 ///

27 ///

This Motion is based upon the papers and pleadings on file with the Court, the exhibits attached hereto, the following Memorandum of Points and Authorities, and any oral argument the Court may entertain at the hearing on this Motion.

DATED this 7th day of May, 2021.

RESNICK & LOUIS, P.C.

By: /s/ Myraleigh A. Alberto
PRESCOTT T. JONES, ESQ.
State Bar Number 11617
pjones@rlattorneys.com
MYRALEIGH A. ALBERTO, ESQ.
State Bar Number 14340
malberto@rlattorneys.com
8925 W. Russell Road, Suite 220
Las Vegas, NV 89148
Telephone: (702) 997-3800
Facsimile: (702) 997-3800
Attorneys for Plaintiff Ton Vinh Lee

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 Plaintiff Ton Vinh Lee (“Plaintiff” or “Dr. Lee”) hereby files this Motion for
4 Reconsideration and Motion to Alter or Amend Judgment respectfully requesting that the Court
5 reconsider, or alter or amend its April 23, 2021, Order (“Order”) granting Defendant Ingrid Patin
6 and Defendant Patin Law Group, PLLC’s (“PLG”) respective motions for attorney fees and costs
7 pursuant to Nevada Rule of Civil Procedure (“NRCPP”) 68. In its Order, the Court found that
8 Plaintiff did not obtain a more favorable outcome than the Defendants’ offers of judgment, and
9 that the Defendants’ offers of judgment were reasonable in timing and amount, such that
10 Defendants should be awarded fees and costs pursuant to NRCPP 68.

11 Plaintiff respectfully submits this Motion on the grounds that the Court erred in finding
12 that Plaintiff did not obtain a more favorable outcome than the Defendants’ offers of judgment
13 because the Court did not apply the complete analysis required by NRCPP 68(g). Application of
14 the complete NRCPP 68(g) analysis results in a different result than what was provided in the
15 Court’s April 23, 2021, Order.

16 NRCPP 68(g) requires Courts to compare (1) the outcome of a litigation, with (2) the
17 amount of an offer of judgment, together with the offeree’s pre-offer taxable costs, expenses,
18 interest, and attorney fees (if attorney fees are permitted by law or contract). Here, Plaintiff is the
19 offeree who was served with Defendants’ offers of judgment. The total amount of the
20 Defendants’ offers of judgment were less than the fees, costs, interest, and expenses of Plaintiff.
21 As a result, the total amount of Defendants’ offers of judgment were in the negative. Offers in
22 negative amounts are not offers at all, and therefore, are invalid. An invalid offer of judgment
23 cannot provide a proper basis for an award of attorney fees and costs. Edwards Indus., Inc. v.
24 DTE/ BTE, Inc., 112 Nev. 1025, 1035, 923 P.2d 569, 575 (1996). However, even if this Court
25 deems Defendants’ negative offers of judgment valid, Plaintiff still obtained a more favorable
26
27
28

1 result by rejecting Defendants' offers of judgment based on the amount of Plaintiff's pre-offer
2 attorney fees alone.

3 **A. Procedural History**

4 On August 17, 2015, Plaintiff filed suit against Defendant Patin and Defendant PLG on
5 the grounds that Defendants published on their website (patinlaw.com) a false and defamatory
6 statement that identifies Plaintiff by name and incorrectly asserts that the Defendants' former
7 client obtained a \$3.4 million jury verdict against Dr. Lee ("Statement"). Dr. Lee's Complaint
8 asserted defamation *per se*, claiming that the Statement as a whole was false, defamatory, and
9 imputed to Dr. Lee a lack of fitness in his profession as dentist and as a business owner.

10 After filing a total of four dispositive motions, on January 19, 2017, Defendant Patin
11 served Plaintiff with an Offer of Judgment in the amount of one thousand dollars (\$1,000.00),
12 "inclusive of all accrued interest, costs, and attorney fees, and any other sums that could be
13 claimed by Defendant, INGRID PATIN, against Plaintiff, TON VINH LEE." **Exhibit A**
14 (Defendant Patin's January 19, 2017, Offer of Judgment).

15 On January 26, 2017, Defendant PLG served Plaintiff with an Offer of Judgment in the
16 amount of one thousand dollars (\$1,000.00), also "inclusive of all accrued interest, costs, and
17 attorney fees, and any other sums that could be claimed by Defendant, PATIN LAW GROUP,
18 against Plaintiff, TON VINH LEE." **Exhibit B** (Defendant PLG's January 26, 2017, Offer of
19 Judgment).

20 On August 7, 2020, Defendant filed her Motion for Judgment on the Pleadings, or in the
21 Alternative, Motion for Summary Judgment, which was the eighth dispositive motion filed by
22 the Defendants in this litigation. The Court granted this the August 7, 2020, motion following
23 oral argument on September 15, 2020.

24 On November 29, 2020, Defendant Ingrid Patin filed her Motion for Attorneys' Fees,
25 Costs, and Interest pursuant to NRS 18.020(3) and NRCP 68. Defendant Patin Law Group filed
26 its Motion for Attorneys' Fees and Interest pursuant to NRCP 68 on the same day.
27
28

1 On April 23, 2021, the Court issued its Notice of Entry of Decision and Order granting,
2 in part, Defendant Ingrid Patin's Motion for Attorneys' Fees, Costs, and Interest, and Defendant
3 Patin Law Group's Motion for Attorneys' Fees and Interest, both pursuant to NRCP 68. For the
4 reasons set forth below, Plaintiff now requests that the Court reconsider, or alter or amend this
5 judgment.

6 II. LEGAL STANDARD

7 A. Legal Standard for Motion for Reconsideration

8 ECDR 2.24 permits parties to move for reconsideration of the Court's order:

9 (a) No motions once heard and disposed of may be renewed in the same
10 cause, nor may the same matters therein embraced be reheard, unless by leave of
11 the court granted upon motion therefor, after notice of such motion to the adverse
parties.

12 (b) **A party seeking reconsideration of a ruling of the court, other than**
13 **any order that may be addressed by motion pursuant to NRCP 50(b), 52(b),**
14 **59 or 60, must file a motion for such relief within 14 days after service of**
15 **written notice of the order or judgment** unless the time is shortened or enlarged
by order. A motion for rehearing or reconsideration must be served, noticed, filed
and heard as is any other motion. A motion for reconsideration does not toll the
period for filing a notice of appeal from a final order or judgment.

16 (c) If a motion for rehearing is granted, the court may make a final
disposition of the cause without reargument or may reset it for reargument or
resubmission or may make such other orders as are deemed appropriate under the
circumstances of the particular case.

17 (emphasis added). Pursuant to EDCR 2.24(b), a motion for reconsideration must be filed within
18 14 days after service of the court's notice of the order. Here, the Order in question was filed on
19 April 23, 2021, and as a result, the instant Motion is timely.

20 "A district court may reconsider a previously decided issue if substantially different
21 evidence is subsequently introduced or the decision is clearly erroneous." Masonry and Tile
22 Contractors Ass'n of S. Nev. v. Jolley, Urga & Wirth, Ltd., 113 Nev. 737, 741, 941 P.2d 486,
23 489 (1997). A court may exercise its discretion to revisit and reverse a prior ruling if one of five
24 circumstances is present. See U.S. v. Real Prop. Located at Incline Vill., 976 F. Supp. 1327,
25 1353 (D. Nev. 1997). Those circumstances are: (1) a clearly erroneous prior ruling, (2) an
26 intervening change in controlling law, (3) substantially different evidence, (4) 'other changed
27 circumstances,' and (5) that 'manifest injustice' would result were the prior ruling permitted to
28

stand. *Id.* Further, reconsideration is proper where “the Court has overlooked or misapprehended a material matter” or “in such other circumstances as will promote substantial justice.” *In Re: Dunleavy*, 104 Nev. 784, 769 P.2d 1271 (1988).

Here, Plaintiff respectfully asserts that the Court erred in determining that Plaintiff failed to obtain a more favorable outcome than Defendants’ offers of judgment because it did not apply the complete analysis required by NRCP 68(g). Accordingly, Plaintiff requests, that the Court reconsider its April 23, 2021, Order granting Defendants’ motions for attorney fees and costs due the grounds set forth below.

B. Legal Standard for Motion to Alter or Amend Judgment Pursuant to NRCP 59(e)

NRCP 59(e) permits parties to move to alter or amend a judgment on a motion, within 28 days after service of written entry of judgment. Here, the Order in question was filed on April 23, 2021, and as a result, the instant Motion is timely. Additionally, pursuant to NRAP 4(C), a motion filed under Rule 59 to alter or amend a judgment will toll the time to file a notice of appeal until 30 days after entry of an order disposing such motion.

NRCP 59(e) echoes Fed. R. Civ. P. 59(e), and this Court may consult federal law in interpreting it. *See AA Primo Builders, LLC v. Washington*, 126 Nev. 578, 582 (2010); *Coury v. Robison*, 115 Nev. 84, 91 n.4, 976 P.2d 518, 522 n.4 (1999).

Because its terms are so general, Federal Rule 59(e) ‘has been interpreted as permitting a motion to vacate a judgment rather than merely amend it,’ and as ‘cover[ing] a broad range of motions, [with] the only real limitation on the type of motion permitted [being] that it must request a substantive alteration of the judgment, not merely correction of a clerical error, or relief of a type wholly collateral to the judgment.’

Id. (internal citations omitted). Among the “basic grounds” for a Rule 59(e) motion are (1) “correct[ing] manifest errors of law or fact,” (2) “newly discovered or previously unavailable evidence,” (3) the need “to prevent manifest injustice,” or (4) a “change in controlling law.” *Id.*

Plaintiff again respectfully asserts that the Court erred in determining that Plaintiff failed to obtain a more favorable outcome than Defendants’ offers of judgment because it did not apply the complete analysis required by NRCP 68(g). Accordingly, Plaintiff requests, in the alternative,

1 that the Court's April 23, 2021, Order granting Defendants' motions for attorney fees and costs
2 be vacated under NRCP 59(e) due the grounds set forth below.

3 **C. Legal Standard for Award of Costs Pursuant to NRCP 68**

4 NRCP 68(f) provides the penalties for rejecting an offer of judgment:

5 **(f) Penalties for Rejection of Offer.**

6 **(1) In General.** If the offeree rejects an offer and fails to obtain a more
favorable judgment:

7 (A) the offeree cannot recover any costs, expenses, or attorney fees and
may not recover interest for the period after the service of the offer and before the
8 judgment; and

9 (B) the offeree must pay the offeror's post-offer costs and expenses,
including a reasonable sum to cover any expenses incurred by the offeror for each
10 expert witness whose services were reasonably necessary to prepare for and
conduct the trial of the case, applicable interest on the judgment from the time of
the offer to the time of entry of the judgment and reasonable attorney fees, if any
11 be allowed, actually incurred by the offeror from the time of the offer. If the
offeror's attorney is collecting a contingent fee, the amount of any attorney fees
12 awarded to the party for whom the offer is made must be deducted from that
contingent fee.

13 Nevada Courts have recognized that where the court properly weighs the factors set forth in
14 Beattie v. Thomas, courts have discretion to allow attorney fees under NRCP 68. 99 Nev. 579
15 (1983); see Bidart v. American Title Ins. Co., 103 Nev. 175 (1987). Courts exercising discretion
16 in allowing fees and costs under NRCP 68 must evaluate the following factors:

17 (1) whether the plaintiff's claim was brought in good faith; (2) whether the
18 defendants' offer of judgment was reasonable and in good faith in both its timing
and amount; (3) whether the plaintiff's decision to reject the offer and proceed to
19 trial was grossly unreasonable or in bad faith; and (4) whether the fees sought by
the offeror are reasonable and justified in amount.

20 Beattie, 99 Nev. at 588-9; see also Uniroyal Goodrich Tire Co. v. Mercer, 111 Nev. 318, 890
21 P.2d 785 (1995). The Beattie Court found that "[a]fter weighing the foregoing factors, the
22 district judge may, where warranted, award up to the full amount of fees requested. On the other
23 hand, where the court has failed to consider these factors, and has made no findings based on
24 evidence that the attorney's fees sought are reasonable and justified, it is an abuse of discretion
25 for the court to award the full amount of fees requested." 99 Nev. at 589. Accordingly, the
26 Nevada Supreme Court has reviewed awards of fees/costs based on an offers of judgment for
27 abuse of discretion. LaForge v. State ex rel. Univ. & Cmty. College Sys., 116 Nev. 415, 423-4
28

(2000); O'Connell v. Wynn Las Vegas, LLC, 2018 Nev. App. LEXIS 6, 8 (2018). Further, the Beattie Court stated that the purpose of NRCP 68 is to encourage settlement, and it is not to force plaintiffs into forgoing legitimate claims. Id. at 588.

III. LEGAL ARGUMENT

A. The Court Must Apply the Full NRCP 68(g) Analysis to Determine Whether Plaintiff Obtained a More Favorable Outcome

In applying the Beattie factors, the Court found that Plaintiff's case was brought in good faith and that Plaintiff's decision to reject the offers were not grossly unreasonable or in bad faith. However, the Court also found that Defendants' offers of judgment were reasonable in time and amount. See Beattie, 99 Nev. at 588-89. Specifically, the Court ruled that Plaintiff did not beat the Defendants' offers of judgment (inclusive of Defendants' attorney fees, costs, interest, and expenses) and granted Defendants' requests for fees and costs pursuant to NRCP 68.

Plaintiff respectfully submits the instant Motion on the grounds that the Court did not apply the complete analysis required by NRCP 68(g) for determining whether the offeree obtained a more favorable judgment than the offer. NRCP 68(g) sets forth how the Court must consider costs, expenses, interest, and attorney fees in deciding whether a more favorable judgment was obtained:

(g) How Costs, Expenses, Interest, and Attorney Fees Are Considered. To invoke the penalties of this rule, the court must determine if the offeree failed to obtain a more favorable judgment. If the offer provided that costs, expenses, interest, and if attorney fees are permitted by law or contract, attorney fees, would be added by the court, the court must compare the amount of the offer with the principal amount of the judgment, without inclusion of costs, expenses, interest, and if attorney fees are permitted by law or contract, attorney fees. **If a party made an offer in a set amount that precluded a separate award of costs, expenses, interest, and if attorney fees are permitted by law or contract, attorney fees, the court must compare the amount of the offer, together with the offeree's pre-offer taxable costs, expenses, interest, and if attorney fees are permitted by law or contract, attorney fees, with the principal amount of the judgment.**

(emphasis added). In its April 23, 2021, Order, the Court did not apply Plaintiff's pre-offer attorney fees, costs, interest, and expenses to the amounts of the Defendants' offers (inclusive of each Defendant's interest, costs, attorney fees, and expenses) when evaluating whether Plaintiff obtained a more favorable outcome. Further, Plaintiff respectfully submits that applying the

1 complete NRCP 68(g) analysis results in a different outcome than what was provided in the
2 Court's April 23, 2021, Order.

3 Pursuant to NRCP 68(g), the Court must evaluate whether Plaintiff obtained a more
4 favorable judgment by comparing (1) the outcome of the litigation, with (2) the amount of the
5 offer of judgment, together with the pre-offer costs, expenses, interest, and attorney fees
6 incurred by Plaintiff, the offeree. Applying this analysis to each Defendant's offer of judgment
7 results in a negative offer amount for each Defendant due to the amount of Plaintiff's pre-offer
8 fees, costs, expenses, and interest.

9 First, was no monetary judgment in this matter, making the judgment amount \$0.

10 Next, the amount of each Defendant's offer of judgment was for \$1,000.00, inclusive of
11 each Defendant's interest, costs, attorney fees, and expenses. **Exhibits A-B.** Each Defendant's
12 \$1,000.00 offer of judgment (inclusive of each Defendant's interest, costs, attorney fees, and
13 expenses) must then be considered with Plaintiff's pre-offer interest, costs, attorney fees, and
14 expenses. NRCP 68(g). Plaintiff had spent over \$10,000.00 in attorney fees alone by the time
15 Defendants served their offers of judgment. Defendant Patin filed her Offer of Judgment on
16 January 19, 2017, and Defendant PLG filed its offer of judgment on January 26, 2017. By
17 March 17, 2016, Plaintiff had spent at least \$10,000.00 on attorney fees in this litigation.
18 **Exhibit C** (Plaintiff's Supplemental Opposition to Defendant Patin's Motion for Attorney Fees,
19 Costs, and Interest, Declaration of Ton Vinh Lee) at p3, lines 19-24.

20 Because the amount of Plaintiff's pre-offer attorney fees alone far exceeded the amounts
21 of each Defendant's \$1,000.00 offer of judgment, the amounts of each Defendant's offer of
22 judgment were in the negative. An offer of judgment in a negative amount cannot constitute a
23 valid offer because it is not an offer at all. Nevada Courts have held that an invalid offer of
24 judgment cannot serve as the basis for an award of attorney fees. See Edwards Indus. Inc. v.
25 DTE/BTE, Inc., 112 Nev. 1025, 1035, 923 P.2d 569, 575 (1996) (concluding that
26 an invalid offer of judgment could not provide a proper basis for an award of attorney fees and
27 costs).
28

1 Even if Defendants' negative offers of judgment are deemed valid by this Court,
2 Defendants' offers of judgment still did not present a more favorable outcome for Plaintiff
3 based on the amount he has spent in attorney fees alone. See Exhibit C (regarding amount spent
4 by Plaintiff on attorney fees). There was no monetary judgment in this matter, making the
5 judgment amount \$0. If Plaintiff had accepted Defendants' offers of judgment, Plaintiff would
6 have received \$1,000.00 for each Defendant (inclusive of Defendants' fees, costs, and interest),
7 less Plaintiff's own attorney fees, costs, and interest, which amounted to over \$10,000.00 by the
8 time Defendants served their offers. As a result, Defendants' offers of judgment did not present
9 a more favorable outcome for Plaintiff.

10 **IV. CONCLUSION**

11 Based on the foregoing, Plaintiff respectfully requests that the Court reconsider, or alter
12 or amend its April 23, 2021 Order granting, in part, Defendants' motions for attorney fees and
13 costs pursuant to NRCP 68.

14 DATED this 7th day of May, 2021.

15 **RESNICK & LOUIS, P.C.**

16
17 /s/ Myrleigh A. Alberto
18 PRESCOTT JONES
19 Nevada Bar No. 11617
20 MYRALEIGH A. ALBERTO
21 Nevada Bar No. 14340
22 8925 W. Russell Road, Suite 220
23 Las Vegas, NV 89148
24 *Attorneys for Plaintiff,*
25 *Ton Vinh Lee*
26
27
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that service of the foregoing **PLAINTIFF TON VINH LEE'S**
MOTION FOR RECONSIDERATION, or in the alternative, MOTION TO ALTER OR
AMEND JUDGMENT PURSUANT TO NRCP 59(e) was served this 7th day of May, 2021,

by:

☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada, addressed as set forth below.

☐ **BY FACSIMILE:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document.

☐ **BY PERSONAL SERVICE:** by causing personal delivery by an employee of Resnick & Louis, P.C. of the document(s) listed above to the person(s) at the address(es) set forth below.

☒ **BY ELECTRONIC SERVICE:** by transmitting via the Court's electronic filing services the document(s) listed above to the Counsel set forth on the service list on this date pursuant to EDCR Rule 7.26(c)(4).

Christian M. Morris, Esq.
NETTLES MORRIS
1389 Galleria Dr., Suite 200
Henderson, NV 89014
Attorney for Defendant Ingrid Patin

Kerry J. Doyle, Esq.
DOYLE LAW GROUP
7375 S. Pecos Rd., #101
Las Vegas, NV 89120
Attorney for Defendant Patin Law Group, PLLC

/s/ Brittany Willis

An Employee of Resnick & Louis, P.C.

EXHIBIT A

01/19/2017 11:34:47 AM

OFFER

CHRISTIAN M. MORRIS, ESQ.

Nevada Bar No. 11218

NETTLES LAW FIRM

1389 Galleria Drive, Suite 200

Henderson, Nevada 89014

Telephone: (702) 434-8282

Facsimile: (702) 434-1488

christian@nettlawfirm.com*Attorney for Defendant, Ingrid Patin***DISTRICT COURT****CLARK COUNTY, NEVADA**

TON VINH LEE, an individual,

Plaintiff,

v.

INGRID PATIN, an individual, and PATIN
LAW GROUP, PLLC, a Nevada
Professional LLC,

Defendants.

CASE NO.: A-15-723134-C

DEPT NO.: IX

**DEFENDANT, INGRID PATIN'S OFFER
OF JUDGMENT TO PLAINTIFF**

TO: TON VINH LEE, Plaintiff; and

TO: PRESCOTT JONES, ESQ. of RESNICK & LOUIS, P.C., Attorney for Plaintiff.

Pursuant to Rule 68 of the N.R.C.P., Defendant, INGRID PATIN, hereby offers to allow judgment to be taken in her favor, only, and against Plaintiff, TON VINH LEE, in the above-entitled matter in the total amount of ONE THOUSAND AND NO/100THS DOLLARS (\$1,000.00), inclusive of all accrued interest, costs, and attorney fees, and any other sums that could be claimed by Defendant, INGRID PATIN, against Plaintiff, TON VINH LEE, in the above-captioned action.

Pursuant to Rule 68 of the N.R.C.P., this offer shall be open for a period of ten (10) days from the date of service of this Offer. In the event this Offer of Judgment is accepted by Plaintiff, TON VINH LEE, Defendant, INGRID PATIN, will elect to pay the amount offered here within a

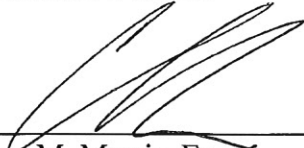
NETTLES LAW FIRM
1389 Galleria Dr. Suite 200
Henderson, NV 89014
702-434-8282 / 702-434-1488 (fax)

1 reasonable time and obtain a dismissal of the claim as provided by N.R.C.P. 68(d), rather than to
2 allow judgment to be entered against Defendant, INGRID PATIN.

3 This Offer of Judgment is made solely for the purposes intended by N.R.C.P. 68 and is
4 not to be construed as an admission in any form, shape or manner that Defendant, INGRID
5 PATIN, is liable for any of the allegations made by Plaintiff in the Complaint. Nor is it an
6 admission that Plaintiff is entitled to any relief, including, but not limited to, an award of
7 damages, attorney's fees, costs or interest and is nullified by any such award.

8 DATED this 19th day of January, 2017.

9 NETTLES LAW FIRM

10
11 
12 Christian M. Morris, Esq.
13 Nevada Bar No. 011218
14 1389 Galleria Drive, Suite 200
15 Henderson, NV 89014
16 *Attorneys for Defendant, Ingrid Patin*
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

Pursuant to NEFCR 9, NRCP 5(b) and EDCR 7.26, I certify that on this 19 day January, 2017, I served the foregoing **DEFENDANT, INGRID PATIN'S OFFER OF JUDGMENT TO PLAINTIFF** to the following parties by electronic transmission through the Wiznet system:

Resnick & Louis		
	Contact	Email
	Coreene Drose	cdrose@rlattorneys.com
	Lisa Bell	lbell@rlattorneys.com
Resnick & Louis, P.C.		
	Contact	Email
	Prescott Jones	pjones@rlattorneys.com


An Employee of NETTLES LAW FIRM

EXHIBIT B

OFFER

PAUL E. LARSEN

Nevada Bar No. 003756

JEREMY J. THOMPSON

Nevada Bar No. 012503

MORRIS POLICH & PURDY LLP

3800 Howard Hughes Pkwy, Suite 500

Las Vegas, NV 89169

Telephone: (702) 862-8300

Facsimile: (702) 862 -- 8400

plarsen@mpplaw.com

jthompson@mpplaw.com

Attorneys for Patin Law Group, PLLC

DISTRICT COURT

CLARK COUNTY, NEVADA

TON VIN LEE, an individual,

Plaintiff,

v.

INGRID PATIN, an individual, and PATIN
LAW GROUP, PLLC, a Nevada Professional
LLC,

Defendants.

) Case No: A723134

) Dept. No: IX

) **DEFENDANT PATIN LAW**
) **GROUP, PLLC'S OFFER OF**
) **JUDGMENT TO PLAINTIFF**

TO: TON VINH LEE, Plaintiff; and

TO: PRESCOTT JONES, ESQ. of RESNICK & LOUIS, P.C., Counsel for Plaintiff.

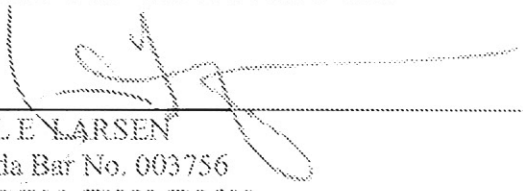
Pursuant to Rule 68 of the N.R.C.P., Defendant, PATIN LAW GROUP, PLLC, hereby offers to allow judgment to be taken in her favor, only, and against Plaintiff, TON VINH LEE, in the above-entitled matter in the total amount of ONE THOUSAND AND NO/100THS DOLLARS (\$1,000.00), inclusive of all accrued interest, costs, and attorney fees, and any other sums that could be claimed by Defendant, PATIN LAW GROUP, PLLC, against Plaintiff, TON VINH LEE, in the above-captioned action.

1 Pursuant to Rule 68 of the N.R.C.P., this offer shall be open for a period of ten (10) days
2 from the date of service of this Offer. In the event this Offer of Judgment is accepted by Plaintiff
3 TON VINH LEE, Defendant, PATIN LAW GROUP, PLLC, will elect to pay the amount offered
4 here within a reasonable time and obtain a dismissal of the claim as provided by N.R.C.P. 68(d),
5 rather than to allow judgment to be entered against Defendant, PATIN LAW GROUP, PLLC.

6 This Offer of Judgment is made solely for the purposes intended by N.R.C.P. 68 and is
7 not to be construed as an admission in any form, shape or manner that Defendant, PATIN LAW
8 GROUP, PLLC, is liable for any of the allegations made by Plaintiff in the Complaint. Nor is it
9 an admission that Plaintiff is entitled to any relief, including, but not limited to, an award of
10 damages, attorney's fees, costs or interest and is nullified by any such award.

11 DATED this 26 day of January, 2017.

12 MORRIS POLICH & PURDY LLP

13
14 
15 PAUL E. LARSEN

16 Nevada Bar No. 003756

17 JEREMY J. THOMPSON

18 Nevada Bar No. 012503

19 MORRIS POLICH & PURDY LLP

20 3800 Howard Hughes Pkwy, Suite 500

21 Las Vegas, NV 89169

22 Telephone: (702) 862-8300

23 Facsimile: (702) 862-8400

24 plarsen@mpplaw.com

25 jthompson@mpplaw.com

26 Attorneys for Patin Law Group, PLLC
27
28

CERTIFICATE OF SERVICE

Pursuant to NEFCR 9, NRCP 5(b) and EDCR 7.26, I certify that on this 26 day January, 2017, I served the foregoing **DEFENDANT PATIN LAW GROUP, PLLC'S OFFER OF JUDGMENT TO PLAINTIFF** to the following parties by electronic transmission through the Wiznet system:

Resnick & Louis

Contact

Coreene Drose
Lisa Bell

Email

cdrose@rlattorneys.com
lbell@rlattorneys.com

Resnick & Louis, P.C.

Contact

Prescott Jones

Email

pjones@rlattorneys.com


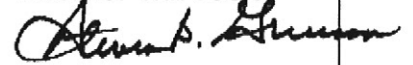

An Employee of MORRIS POLICH & PURDY LLP

EXHIBIT C



1 **SUPP**
2 **RESNICK & LOUIS, P.C.**
3 **PRESCOTT JONES**
4 Nevada Bar No. 11617
5 pjones@rlattorneys.com
6 **MYRALEIGH A. ALBERTO**
7 Nevada Bar No. 14340
8 malberto@rlattorneys.com
9 8925 W. Russell Road, Suite 220
10 Las Vegas, Nevada 89148
11 Telephone: (702) 997-3800
12 Facsimile: (702) 997-3800
13 *Attorneys for Plaintiff,*
14 *Ton Vinh Lee*

15
16 **DISTRICT COURT**
17
18 **CLARK COUNTY, NEVADA**

19
20
21 TON VINH LEE,

22 Plaintiff,

23 v.

24 INGRID PATIN, an individual, and PATIN
25 LAW GROUP, PLLC, a Nevada Professional
26 LLC,

27 Defendants.
28

CASE NO.: A-15-723134-C

DEPT: 26

**PLAINTIFF TON VINH LEE'S
SUPPLEMENTAL OPPOSITION TO
DEFENDANT INGRID PATIN'S
MOTION FOR ATTORNEYS' FEES,
COSTS, AND INTEREST**

29 COMES NOW, Plaintiff, TON VINH LEE, by and through his attorneys of record,
30 PRESCOTT T. JONES, ESQ. and MYRALEIGH A. ALBERTO, ESQ. of the law firm of
31 RESNICK & LOUIS, P.C., hereby submits this SUPPLEMENTAL OPPOSITION TO
32 DEFENDANT INGRID PATIN'S MOTION FOR ATTORNEYS' FEES, COSTS, AND
33 INTEREST.

34 ///

35 ///

1 This Supplement and the original Opposition are based upon the papers and pleadings on
2 file with the Court, the exhibits attached hereto, the following Memorandum of Points and
3 Authorities, and any oral argument the Court may entertain at the hearing on this matter.

4 DATED this 3rd day of February, 2021.

5 **RESNICK & LOUIS, P.C.**

6 */s/ Myraleigh A. Alberto*

7 _____
8 PRESCOTT JONES

9 Nevada Bar No. 11617

10 MYRALEIGH A. ALBERTO

11 Nevada Bar No. 14340

12 8925 W. Russell Road, Suite 220

13 Las Vegas, NV 89148

14 *Attorneys for Plaintiff,*

15 *Ton Vinh Lee*

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2

3
4
5

6

7
8
9

10
11
12
13
14

15

16

17
1819
20

21
22
23
24

1 I declare under penalty of perjury under the law of the State of Nevada that the
2 foregoing is true and correct to the best of my knowledge, memory, and understanding.

3
4 DATED this 3rd day of February, 2021.

5 */s/ Ton Vinh Lee*

6
7

Ton Vinh Lee

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

MEMORANDUM OF POINTS AND AUTHORITIES

I.

LEGAL ARGUMENT

A. Defendant Ingrid Patin is Not Entitled to Attorney's Fees, Costs, and Interest Pursuant to NRCP 68 Because Plaintiff Beat Defendant's Offer of Judgment, Which Was Inclusive of Attorney Fees

Defendant argues that she is also entitled to attorneys' fees, costs, and interest pursuant to NRCP 68(f), which states:

(f) Penalties for Rejection of Offer.

(1) In General. If the offeree rejects an offer and fails to obtain a more favorable judgment:

(A) the offeree cannot recover any costs, expenses, or attorney fees and may not recover interest for the period after the service of the offer and before the judgment; and

(B) the offeree must pay the offeror's post-offer costs and expenses, including a reasonable sum to cover any expenses incurred by the offeror for each expert witness whose services were reasonably necessary to prepare for and conduct the trial of the case, applicable interest on the judgment from the time of the offer to the time of entry of the judgment and reasonable attorney fees, if any be allowed, actually incurred by the offeror from the time of the offer. If the offeror's attorney is collecting a contingent fee, the amount of any attorney fees awarded to the party for whom the offer is made must be deducted from that contingent fee.

On January 19, 2017, Defendant Ingrid Patin served an Offer of Judgment ("OOJ") in the amount of "ONE THOUSAND AND NO/100THS DOLLARS (\$1,000.00), **inclusive of all accrued interest, costs, and attorney fees**, and any other sums that could be claimed by Defendant, INGRID PATIN, against Plaintiff, TON VINH LEE, in the above-captioned litigation" (emphasis added). **See Exhibit A.** Plaintiff allowed Defendant's OOJ to expire, effectively rejecting the OOJ.

By March 17, 2016, Dr. Lee had spent at least \$10,000.00 on attorney fees in this litigation, which far exceeds Defendant Ingrid Patin's \$1,000.00 OOJ. Upon retaining counsel for this litigation, Dr. Lee paid an initial retainer of \$10,000.00 prior to filing his August 17, 2015, Complaint. By March 17, 2016, the initial \$10,000.00 retainer had been depleted by attorney fees. As a result, Dr. Lee deposited an additional \$10,000.00 to his retainer account on March 17, 2016 for this litigation. Defendant Patin's \$1,000.00 OOJ is clear that it is inclusive

1 of attorney fees. Accordingly, Defendant Ingrid Patin is not entitled to an award of attorney
2 fees because her OOJ did not present a more favorable outcome for Dr. Lee based on the
3 amount he has spent in attorney fees alone.

4 **III.**

5 **CONCLUSION**

6 For the reasons set forth in this Supplemental Opposition, Defendant Ingrid Patin is not
7 entitled to an award of attorneys' fees, costs, and interest. Accordingly, Plaintiff respectfully
8 requests that this Court deny Defendant Ingrid Patin's Motion for Attorneys' Fees, Costs, and
9 Interest.

10 DATED this 3rd day of February, 2021.

11 **RESNICK & LOUIS, P.C.**

12 */s/ Myrleigh A. Alberto*

13
14 _____
15 PRESCOTT JONES
16 Nevada Bar No. 11617
17 MYRALEIGH A. ALBERTO
18 Nevada Bar No. 14340
19 8925 W. Russell Road, Suite 220
20 Las Vegas, NV 89148
21 *Attorneys for Plaintiff,*
22 *Ton Vinh Lee*
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that service of the foregoing **PLAINTIFF TON VINH LEE'S SUPPLEMENTAL OPPOSITION TO DEFENDANT INGRID PATIN'S MOTION FOR ATTORNEYS' FEES, COSTS, AND INTEREST** was served this 3rd day of February*, 2021, by:

☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada, addressed as set forth below.

☐ **BY FACSIMILE:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document.

☐ **BY PERSONAL SERVICE:** by causing personal delivery by an employee of Resnick & Louis, P.C. of the document(s) listed above to the person(s) at the address(es) set forth below.

☒ **BY ELECTRONIC SERVICE:** by transmitting via the Court's electronic filing services the document(s) listed above to the Counsel set forth on the service list on this date pursuant to EDCR Rule 7.26(c)(4).

Christian M. Morris, Esq.
NETTLES MORRIS
1389 Galleria Dr., Suite 200
Henderson, NV 89014
Attorney for Defendant Ingrid Patin

Kerry J. Doyle, Esq.
DOYLE LAW GROUP
7375 S. Pecos Rd., #101
Las Vegas, NV 89120
Attorney for Defendant Patin Law Group, PLLC

/s/ Susan Carbone

An Employee of Resnick & Louis, P.C.

EXHIBIT “A”

NETTLES LAW FIRM
1389 Galleria Dr. Suite 200
Henderson, NV 89014
702-434-8282 / 702-434-1488 (fax)

OFFER

CHRISTIAN M. MORRIS, ESQ.
Nevada Bar No. 11218
NETTLES LAW FIRM
1389 Galleria Drive, Suite 200
Henderson, Nevada 89014
Telephone: (702) 434-8282
Facsimile: (702) 434-1488
christian@nettleslawfirm.com
Attorney for Defendant, Ingrid Patin

**DISTRICT COURT
CLARK COUNTY, NEVADA**

TON VINH LEE, an individual,

Plaintiff,

v.

INGRID PATIN, an individual, and PATIN
LAW GROUP, PLLC, a Nevada
Professional LLC,

Defendants.

CASE NO.: A-15-723134-C
DEPT NO.: IX

**DEFENDANT, INGRID PATIN'S OFFER
OF JUDGMENT TO PLAINTIFF**

TO: TON VINH LEE, Plaintiff; and

TO: PRESCOTT JONES, ESQ. of RESNICK & LOUIS, P.C., Attorney for Plaintiff.

Pursuant to Rule 68 of the N.R.C.P., Defendant, INGRID PATIN, hereby offers to allow judgment to be taken in her favor, only, and against Plaintiff, TON VINH LEE, in the above-entitled matter in the total amount of ONE THOUSAND AND NO/100THS DOLLARS (\$1,000.00), inclusive of all accrued interest, costs, and attorney fees, and any other sums that could be claimed by Defendant, INGRID PATIN, against Plaintiff, TON VINH LEE, in the above-captioned action.

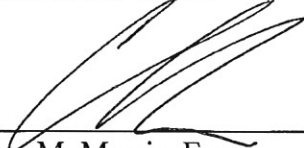
Pursuant to Rule 68 of the N.R.C.P., this offer shall be open for a period of ten (10) days from the date of service of this Offer. In the event this Offer of Judgment is accepted by Plaintiff, TON VINH LEE, Defendant, INGRID PATIN, will elect to pay the amount offered here within a

1 reasonable time and obtain a dismissal of the claim as provided by N.R.C.P. 68(d), rather than to
2 allow judgment to be entered against Defendant, INGRID PATIN.

3 This Offer of Judgment is made solely for the purposes intended by N.R.C.P. 68 and is
4 not to be construed as an admission in any form, shape or manner that Defendant, INGRID
5 PATIN, is liable for any of the allegations made by Plaintiff in the Complaint. Nor is it an
6 admission that Plaintiff is entitled to any relief, including, but not limited to, an award of
7 damages, attorney's fees, costs or interest and is nullified by any such award.

8 DATED this 19th day of January, 2017.

9 NETTLES LAW FIRM

10
11 
12 Christian M. Morris, Esq.
13 Nevada Bar No. 011218
14 1389 Galleria Drive, Suite 200
15 Henderson, NV 89014
16 *Attorneys for Defendant, Ingrid Patin*
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

Pursuant to NEFCR 9, NRCP 5(b) and EDCR 7.26, I certify that on this 19 day January, 2017, I served the foregoing **DEFENDANT, INGRID PATIN'S OFFER OF JUDGMENT TO PLAINTIFF** to the following parties by electronic transmission through the Wiznet system:

Resnick & Louis

Contact

Coreene Drose

Lisa Bell

Email

cdrose@rlattorneys.com

lbell@rlattorneys.com

Resnick & Louis, P.C.

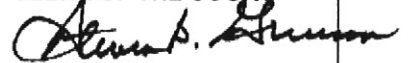
Contact

Prescott Jones

Email

pjones@rlattorneys.com


An Employee of NETTLES LAW FIRM



1 **NEOJ**
2 **RESNICK & LOUIS, P.C.**
3 **PRESCOTT JONES**
4 Nevada Bar No. 11617
5 pjones@rlattorneys.com
6 **MYRALEIGH A. ALBERTO**
7 Nevada Bar No. 14340
8 malberto@rlattorneys.com
9 8925 W. Russell Road, Suite 220
10 Las Vegas, Nevada 89148
11 Telephone: (702) 997-3800
12 Facsimile: (702) 997-3800
13 *Attorneys for Plaintiff,*
14 *Ton Vinh Lee*

**DISTRICT COURT
CLARK COUNTY, NEVADA**

11 TON VINH LEE,
12
13 Plaintiff,
14 v.

CASE NO.: A-15-723134-C

DEPT: 26

NOTICE OF ENTRY OF ORDER

14 INGRID PATIN, an individual, and PATIN
15 LAW GROUP, PLLC, a Nevada Professional
16 LLC,
17
18 Defendants.

18 PLEASE TAKE NOTICE that the ORDER DENYING PLAINTIFF'S MOTION FOR
19 RECONSIDERATION, OR IN THE ALTERNATIVE, MOTION TO AMEND OR ALTER
20 JUDGMENT PURSUANT TO NRCP 59(E) was entered on the 11th day of June, 2021, a copy of
21 which is attached hereto.

22 DATED this 11th day of June, 2021.

23 **RESNICK & LOUIS, P.C.**

24 */s/ Prescott Jones*

25 _____
26 PRESCOTT JONES, SBN: 11617
27 MYRALEIGH A. ALBERTO, SBN: 14340
28 8925 W. Russell Road, Suite 220
Las Vegas, NV 89148
Attorneys for Plaintiff, Ton Vinh Lee

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that service of the foregoing **NOTICE OF ENTRY OF ORDER** was served this 11th day of June, 2021, by:

☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada, addressed as set forth below.

☐ **BY FACSIMILE:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document.

☐ **BY PERSONAL SERVICE:** by causing personal delivery by an employee of Resnick & Louis, P.C. of the document(s) listed above to the person(s) at the address(es) set forth below.

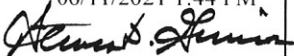
☒ **BY ELECTRONIC SERVICE:** by transmitting via the Court's electronic filing services the document(s) listed above to the Counsel set forth on the service list on this date pursuant to EDCR Rule 7.26(c)(4).

Christian M. Morris, Esq.
NETTLES MORRIS
1389 Galleria Dr., Suite 200
Henderson, NV 89014
Attorney for Defendant Ingrid Patin

Kerry J. Doyle, Esq.
DOYLE LAW GROUP
7375 S. Pecos Rd., #101
Las Vegas, NV 89120
Attorney for Defendant Patin Law Group, PLLC

/s/ Susan Carbone

An Employee of Resnick & Louis, P.C.


CLERK OF THE COURT

ORDR
RESNICK & LOUIS, P.C.
PRESCOTT JONES
Nevada Bar No. 11617
pjones@rlattorneys.com
8925 W. Russell Rd., Ste. 220
Las Vegas, Nevada 89148
Telephone: (702) 997-1029
Facsimile: (702) 997-3800
Attorneys for Plaintiff,
Ton Vinh Lee

DISTRICT COURT

CLARK COUNTY, NEVADA

TON VINH LEE,

Plaintiff,

v.

INGRID PATIN, an individual, and PATIN
LAW GROUP, PLLC, a Nevada Professional
LLC,

Defendants.

CASE NO.: A-15-723134-C

DEPT: 26

**ORDER DENYING PLAINTIFF'S
MOTION FOR RECONSIDERATION,
OR IN THE ALTERNATIVE, MOTION
TO AMEND OR ALTER JUDGMENT
PURSUANT TO NRCP 59(E)**

This matter came on for Hearing on May 19, 2021, before the Honorable Judge Gloria J. Sturman. The Court having read and considered the pleadings on file, having heard the oral arguments of counsel, and having considered the matter and being fully advised, and good cause appearing therefore, finds as follows:

THIS COURT FINDS that Plaintiff's Motion for Reconsideration or, in the Alternative, Motion to Amend or Alter Judgment, does not challenge the amount of attorney's fees awarded, but rather challenges the granting of attorney's fees itself.

THIS COURT FURTHER FINDS that Plaintiff's arguments regarding application of NRC 68(g) to be interesting but do not warrant reconsideration of the Court's April 21, 2021 Decision and Order.

THIS COURT HEREBY ORDERS Plaintiff's Motion for Reconsideration or, in the Alternative, Motion to Amend or Alter Judgment is **DENIED**.

DATED this _____ day of _____, 2021.

Dated this 11th day of June, 2021



DISTRICT COURT JUDGE
CBB DD8 D89A FB17
Gloria Sturman
District Court Judge

Submitted by:

RESNICK & LOUIS, P.C.

/s/ Prescott Jones

PRESCOTT JONES
Nevada Bar No. 11617
8925 W. Russell Rd, Suite 220
Las Vegas, NV 89148
pjones@rlattorneys.com
Telephone: (702) 997-1029
Facsimile: (702) 997-3800
Attorneys for Plaintiff,
Ton Vinh Lee

///

///

///

1 Reviewed and approved as to form and content by:

2 **NETTLES MORRIS**

3 */s/ Christian Morris*

4
5

CHRISTIAN MORRIS, ESQ.
6 Nevada Bar. No. 11218
7 1389 Galleria Drive, Suite 200
8 Henderson, Nevada 89014
9 *Attorneys for Defendant,*
10 *Ingrid Patin*

11
12 **DOYLE LAW GROUP, LLC**

13 */s/ Kerry Doyle*

14
15

KERRY DOYLE, ESQ.
16 Nevada Bar. No. 11218
17 7375 S. Pecos Rd., Suite 101
18 Las Vegas, Nevada 89120
19 *Attorneys for Defendant,*
20 *Patin Law Group PLLC*

From: [Christian Morris](#)
To: [Prescott Jones](#); kdoyle@doylelawgrouplv.com
Cc: [Jenn Alexy](#); [Susan Carbone](#); [Myraleigh Alberto](#)
Subject: RE: Lee v. Patin - Proposed Order
Date: Monday, May 31, 2021 2:11:54 PM
Attachments: [image001.png](#)

Hi Prescott,
You may affix my signature.
Thank you,
Christian

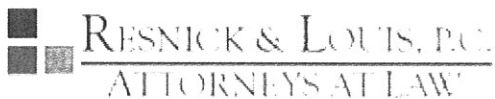
From: Prescott Jones <pjones@rlattorneys.com>
Sent: Friday, May 28, 2021 3:01 PM
To: Christian Morris <Christian@nettlesmorris.com>; kdoyle@doylelawgrouplv.com
Cc: Jenn Alexy <Jenn@nettlesmorris.com>; Susan Carbone <scarbone@rlattorneys.com>; Myraleigh Alberto <malberto@rlattorneys.com>
Subject: Lee v. Patin - Proposed Order

Hi Christian and Kerry –

Attached is the proposed order on my client's Motion for Reconsideration for your review. Please let me know if you have any revisions by the end of the day Tuesday, June 1, 2021. Hope you both have a great holiday weekend.

Regards,

Prescott T. Jones, Esq.
Resnick & Louis, P.C.
8925 West Russell Road, Suite 220
Las Vegas, NV 89148
Direct Phone: 702-997-1029
pjones@rlattorneys.com
<http://www.rlattorneys.com>



ALBUQUERQUE | BAKERSFIELD | CHARLESTON | DALLAS | DENVER | HOUSTON | JACKSON | LAS VEGAS | MIAMI | ORANGE COUNTY | ORLANDO | PHOENIX | RIVERSIDE | SACRAMENTO | SALT LAKE CITY | SAN DIEGO | TAMPA | LONDON, UK
This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

From: [Kerry Doyle](#)
To: [Prescott Jones](#)
Cc: [Christian Morris](#); [Jenn Alexy](#); [Susan Carbone](#); [Myraleigh Alberto](#)
Subject: Re: Lee v. Patin - Proposed Order
Date: Tuesday, June 1, 2021 9:30:51 AM
Attachments: [PastedGraphic-2.tiff](#)

Yes. Please.

Kerry J. Doyle, Esq.
Doyle Law Group
7375 S. Pecos Rd. #101
Las Vegas, NV 89120
702.706.3323 (general)
702.921.7823 (fax)
kdoyle@DoyleLawGroupLV.com
www.DoyleLawGroupLV.com



NOTICE: The information contained in this electronic message is intended only for the personal and confidential use of the designated recipient(s) named above. This message may be attorney-client communication, and as such, is privileged and confidential. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error, and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone or return e-mail and permanently destroy all original messages. Thank you.

On Jun 1, 2021, at 9:29 AM, Prescott Jones <pjones@rlattorneys.com> wrote:

Thank you Christian. Kerry – do we have your authority to include your signature?

Prescott T. Jones, Esq.

Resnick & Louis, P.C.
8925 West Russell Road, Suite 220
Las Vegas, NV 89148
Direct Phone: 702-997-1029
pjones@rlattorneys.com
<http://www.rlattorneys.com>

<image001.png>

Albuquerque | Bakersfield | Charleston | Dallas | Denver | Houston | Jackson | Las Vegas |
Miami | Orange County | Orlando | Phoenix | Riverside | Sacramento | Salt Lake City | San
Diego | Tampa | London, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

From: Christian Morris <Christian@nettlesmorris.com>
Sent: Monday, May 31, 2021 2:12 PM
To: Prescott Jones <pjones@rlattorneys.com>; kdoyle@doylelawgroupplv.com
Cc: Jenn Alexy <Jenn@nettlesmorris.com>; Susan Carbone
<scarbone@rlattorneys.com>; Myraleigh Alberto <malberto@rlattorneys.com>
Subject: RE: Lee v. Patin - Proposed Order

Hi Prescott,
You may affix my signature.
Thank you,
Christian

From: Prescott Jones <pjones@rlattorneys.com>
Sent: Friday, May 28, 2021 3:01 PM
To: Christian Morris <Christian@nettlesmorris.com>; kdoyle@doylelawgroupplv.com
Cc: Jenn Alexy <Jenn@nettlesmorris.com>; Susan Carbone
<scarbone@rlattorneys.com>; Myraleigh Alberto <malberto@rlattorneys.com>
Subject: Lee v. Patin - Proposed Order

Hi Christian and Kerry –

Attached is the proposed order on my client's Motion for Reconsideration for your review. Please let me know if you have any revisions by the end of the day Tuesday, June 1, 2021. Hope you both have a great holiday weekend.

Regards,

Prescott T. Jones, Esq.
Resnick & Louis, P.C.
8925 West Russell Road, Suite 220
Las Vegas, NV 89148
Direct Phone: 702-997-1029
pjones@rlattorneys.com
<http://www.rlattorneys.com>

<image001.png>

Albuquerque | Bakersfield | Charleston | Dallas | Denver | Houston | Jackson | Las Vegas |
Miami | Orange County | Orlando | Phoenix | Riverside | Sacramento | Salt Lake City | San
Diego | Tampa | London, UK

This message is confidential and may contain privileged information. Only the intended recipient is authorized to read or utilize the information contained in this e-mail. If you receive this message in error, please discard the message and advise the sender by reply e-mail or by phone.

1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Ton Lee, Plaintiff(s)

CASE NO: A-15-723134-C

7 vs.

DEPT. NO. Department 26

8 Ingrid Patin, Defendant(s)

9
10 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 6/11/2021

15 "Christian M. Morris, Esq." . christianmorris@nettleslawfirm.com

16 "Jeremy J. Thompson, Esq." . jthompson@mpplaw.com

17 "Paul E Larsen, Esq." . plarsen@mpplaw.com

18 Coreene Drose . cdrose@rlattorneys.com

19 Cristina Robertson . crobertson@mpplaw.com

20 Debbie Surowiec . dsurowiec@mpplaw.com

21 Ingrid Patin . ingrid@patinlaw.com

22 Jenn Alexy . jenn@nettleslawfirm.com

23 Joyce Ulmer . julmer@mpplaw.com

24 Lisa Bell . lbell@rlattorneys.com

25 Nancy C. Rodriguez . nrodriguez@mpplaw.com

26
27
28

1	Prescott Jones .	pjones@rlattorneys.com
2	Christian Morris	christian@nettlesmorris.com
3	Tori Allen	victoria@nettlesmorris.com
4	Kerry Doyle	kdoyle@doylelawgroup.lv.com
5	Mikayla Hurtt	admin@doylelawgroup.lv.com
6	Emily Arriviello	emily@nettlesmorris.com
7	Myrleigh Alberto	malberto@rlattorneys.com
8	Brittany Willis	bwillis@rlattorneys.com
9	Susan Carbone	Scarbone@rlattorneys.com
10	Jessica Humphrey	Jhumphrey@rlattorneys.com
11	Melanie Herman	mail@rlattorneys.com
12	Prescott Jones	pjones@rlattorneys.com
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		