

NOA
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Attorneys for Defendant
Edgeworth Family Trust and
American Grating, LLC

DISTRICT COURT
CLARK COUNTY, NEVADA

EDGEWORTH FAMILY TRUST;) Case No: A-16-738444-C
AMERICAN GRATING, LLC,) Dept. No: X

Plaintiffs,

v.

LANGE PLUMBING, LLC ET AL.,

Defendants.

EDGEWORTH FAMILY TRUST;
AMERICAN GRATING, LLC,

Plaintiffs,

v.

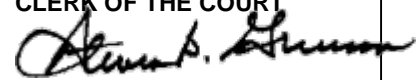
DANIEL S. SIMON, AT AL.,

Defendants.

) Case No: A-18-767242-C
) Dept. No. X

) NOTICE OF APPEAL

Electronically Filed
7/17/2021 2:31 PM
Steven D. Grierson
CLERK OF THE COURT



Electronically Filed
Jul 23 2021 01:00 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Please take notice that Plaintiffs Edgeworth Family Trust, American Grating, LLC hereby appeal to the Supreme Court of Nevada from the following orders and all rulings made appealable by these orders:

1. Decision and Order Entered June 18, 2021 Denying Motion styled as Plaintiff's Renewed Motion for Reconsideration of April 19, 2021 Third-Amended Decision and refusing to obey the mandate of this Court expressed in its Order of December 30, 2020 (Remittitur Issued April 13, 2021) in Case Nos. 77678/78176;¹
2. Decision and Order Denying Edgeworth's Motion for Order Releasing Client Funds in Excess of the Judgment, and Requiring Production of Complete File, entered on June 18, 2021.

MORRIS LAW GROUP

By: /s/ STEVE MORRIS
Steve Morris, Bar No. 1543
Rosa Solis-Rainey, Bar No. 7921
801 S. Rancho Dr., Ste. B4
Las Vegas, Nevada 89106

Attorneys for Defendants
Edgeworth Family Trust and
American Grating, LLC

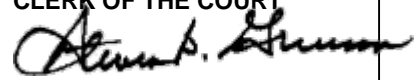
¹ This Decision and Order of the district court could be potentially confusing because of the district court's issuance of orders when it did not have jurisdiction, prior to issuance of remittitur, and the court's April 19, 2021 republishing a prior order issued *sua sponte* without jurisdiction and without consideration of this Court's mandate to reconsider the award of attorney fees to Respondent Simon under the *Brunzell* factors. The Edgeworths' effort to bring that *Brunzell* issue on remand to the district court was styled Motion for Reconsideration of Third Amended Decision and Order on Motion to Adjudicate lien. That motion was the first effort to bring to the district court's attention the fact that she had not responded to this Court's *Brunzell* mandate, which she still declined to do in her order of June 18, 2021, denying the Edgeworths' motion.

CERTIFICATE OF SERVICE

Pursuant to Nev. R. Civ. P. 5(b) and NEFCR 9, I certify that I am an employee of MORRIS LAW GROUP, and that I caused the following to be served via the Court's mandatory e-filing and service system to those persons designated by the parties in the E-Service Master list for the above-referenced matter: **NOTICE OF APPEAL**

DATED this 17th day of June, 2021.

By: /s/ GABRIELA MERCADO
An employee of Morris Law Group



ASTA
MORRIS LAW GROUP
Steve Morris, Bar No. 1543
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Email: rsr@morrislawgroup.com

Attorneys for Defendant
Edgeworth Family Trust and
American Grating, LLC

DISTRICT COURT
CLARK COUNTY, NEVADA

EDGEWORTH FAMILY TRUST;) Case No: A-16-738444-C
AMERICAN GRATING, LLC,) Dept. No: X

Plaintiffs,

v.

LANGE PLUMBING, LLC ET AL.,

Defendants.

EDGEWORTH FAMILY TRUST;
AMERICAN GRATING, LLC,

Plaintiffs,

v.

DANIEL S. SIMON, AT AL.,

Defendants.

Case No: A-18-767242-C
Dept. No. X

EDGEWORTH FAMILY TRUST
AND AMERICAN GRATING LLC'S
CASE APPEAL STATEMENT

Please take notice that Plaintiffs Edgeworth Family Trust, American Grating, LLC hereby submit the following Case Appeal Statement pursuant to NRAP 3(f).

1. Name of appellant(s) filing this case appeal statement:

Edgeworth Family Trust and American Grating, LLC

2. Presiding Judge:

The Hon. Tierra Jones, Clark County District Court Judge,
Department X.

3. Identify each appellant and the name and address of counsel for each appellant:

Appellants Edgeworth Family Trust and American Grating, LLC
are both represented by

MORRIS LAW GROUP
Steve Morris
Rosa Solis-Rainey
801 S. Rancho Dr., Ste B4,
Las Vegas, NV 89106

4. Identify each respondent and the name and address of appellate counsel:

The undersigned believes that Respondent Daniel S. Simon and
the Law Office of Daniel S. Simon, A Professional Corporation,
will be represented by

CHRISTIANSEN LAW OFFICES Peter S. Christiansen Kendele L. Works 810 S. Casino Center Blvd., Ste 104 Las Vegas, Nevada 89101 and/or	JAMES R. CHRISTENSEN 601 S. Third Street Las Vegas, NV 89101
--	--

5. Whether any attorney identified in response to subparagraph 3 or 4 is not licensed to practice law in Nevada.

None, all are licensed in Nevada.

6. Whether appellants were represented by appointed or retained counsel in the district court:

Retained.

7. Whether any appellant was granted leave to proceed *in forma pauperis*:

Not applicable.

8. Indicate the date the proceedings commenced in the district court:

The Complaint in the underlying property damage/products defect dispute was filed on June 4, 2016; the lien was filed on November 30, 2017 and amended on January 2, 2018.

9. 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 action involved a property damage claim due to a defective product. This appeal, like the proceedings referenced in #10 below, arise from the attorney lien adjudication proceedings that followed settlement of the underlying action. This Court affirmed the district court's lien adjudication, its finding that the attorney, Daniel Simon, was constructively discharged, and remanded for the district court to (1) explain the basis of the \$200,000 quantum meruit award and its reasonableness under *Brunzell*, and (2) to also explain the reasonableness under *Brunzell* of the \$55,000 attorney's fees and costs award entered by the district court. On remand, the district

1 court entered an order explaining the reasonableness of the
2 \$50,000 attorney fee award and remitted the cost amount to the
3 actual amount incurred (\$2,520). With respect to No. 1, however,
4 the district court entered an amended order awarding the same
5 \$200,000 in quantum meruit without offering any explanation as
6 to its basis or its reasonableness under *Brunzell* as the Supreme
7 Court expressly directed it to do. The district court also refused
8 to enter an order releasing the excess between the more than
9 \$2M in funds being withheld from Appellants since 2018, and
10 the unpaid judgments. The district court also refused to order
11 Respondents to turn over the complete Edgeworth client file to
12 Appellants, despite the fact that Respondent Simon's fees were
13 fully secured.

14 **10. Whether the case has previously been the subject of an appeal to**
15 **or original writ proceeding in the Supreme Court or Court of**
16 **Appeals and, if so, the caption and docket number of the prior**
17 **proceeding:**

18 This case has been the subject of two appeals and one writ
19 proceeding:

- 20 a. Case No. 77678. Appellants: Edgeworth Family Trust and
21 American Grating, LLC; Respondents: Daniel S. Simon; and
22 the Law Office of Daniel S. Simon, a Professional Corporation.
23 b. Case No. 78176 (consolidated with 77878).
24 Appellants: Edgeworth Family Trust and American Grating,
25 LLC; Respondents: Daniel S. Simon; and the Law Office of
26 Daniel S. Simon, a Professional Corporation.
27 c. Case No. 79821. Writ of Prohibition or Mandamus.
28

Petitioner: Law Office of Daniel Simon; Respondent: Eighth
Judicial district Court, the Hon. Tierra Jones; Real Parties in
Interest: Edgeworth Family Trust and American Grating,
LLC.

11. Whether this appeal involves child custody or visitation:

No.

12. If this is a civil case, indicate whether this appeal involves the
possibility of settlement:

Not Likely.

MORRIS LAW GROUP

By: /s/ STEVE MORRIS

Steve Morris, Bar No. 1543
Rosa Solis-Rainey, Bar No. 7921
801 S. Rancho Dr., Ste. B4
Las Vegas, Nevada 89106

Attorneys for Defendants
Edgeworth Family Trust and
American Grating, LLC

CERTIFICATE OF SERVICE

Pursuant to Nev. R. Civ. P. 5(b) and NEFCR 9, I certify that I am an employee of MORRIS LAW GROUP, and that I caused the following to be served via the Court's mandatory e-filing and service system to those persons designated by the parties in the E-Service Master list for the above-referenced matter: **EDGEWORTH FAMILY TRUST AND AMERICAN GRATING LLC'S CASE APPEAL STATEMENT**

DATED this 17th day of July, 2021.

By: /s/ GABRIELA MERCADO
An employee of Morris Law Group

CASE SUMMARY**CASE NO. A-18-767242-C**

Edgeworth Family Trust, Plaintiff(s)
vs.
Daniel Simon, Defendant(s)

§
§
§
§
§

Location: **Department 10**
 Judicial Officer: **Jones, Tierra**
 Filed on: **01/04/2018**
 Case Number History:
 Cross-Reference Case Number: **A767242**

CASE INFORMATION**Related Cases**

A-16-738444-C (Consolidated)

Case Type: **Other Contract****Statistical Closures**

06/17/2021 Other Manner of Disposition
 04/19/2021 Other Manner of Disposition
 11/19/2018 Summary Judgment

Case Status: **06/17/2021 Closed**

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

Case Number A-18-767242-C
 Court Department 10
 Date Assigned 02/10/2021
 Judicial Officer Jones, Tierra

PARTY INFORMATION**Plaintiff****American Grating, LLC***Lead Attorneys*

Calvert, Lauren
Retained
 702-363-5100(W)

Edgeworth Family Trust

Calvert, Lauren
Retained
 702-363-5100(W)

Defendant**Law Office of Daniel S Simon****Simon Law**

Removed: 01/04/2018
 Data Entry Error

Simon, Daniel S.

Christensen, James R.
Retained
 702-272-0406(W)

DATE**EVENTS & ORDERS OF THE COURT****INDEX****EVENTS**

01/04/2018



Complaint

Filed By: Plaintiff Edgeworth Family Trust
[1] Complaint

01/04/2018



Initial Appearance Fee Disclosure

Filed By: Plaintiff Edgeworth Family Trust
[2] Initial Appearance Fee Disclosure

01/04/2018



Summons Electronically Issued - Service Pending

Party: Plaintiff Edgeworth Family Trust

CASE SUMMARY
CASE NO. A-18-767242-C

[3] Summons

01/04/2018



Demand for Jury Trial

Filed By: Plaintiff Edgeworth Family Trust

[4] Demand for Jury Trial

01/09/2018



Acceptance of Service

Filed By: Plaintiff Edgeworth Family Trust; Plaintiff American Grating, LLC

[5] Acceptance of Service of the Summons and Complaint

01/09/2018



Peremptory Challenge

Filed by: Plaintiff Edgeworth Family Trust; Plaintiff American Grating, LLC

[6] Pere

01/10/2018



Notice of Department Reassignment

[7] Notice of Department Reassignment

01/25/2018



Motion to Consolidate

Filed By: Defendant Simon, Daniel S.

[8] Motion to Consolidate on OST

01/29/2018



Motion to Dismiss

Filed By: Defendant Simon, Daniel S.

[9] Motion to Dismiss

01/29/2018



Initial Appearance Fee Disclosure

Filed By: Defendant Simon, Daniel S.

[10] Initial Appearance Fee Disclosure

02/05/2018



Reply in Support

Filed By: Defendant Simon, Daniel S.

[11] Reply in Support of Motion to Consolidate

02/09/2018



Notice of Department Reassignment

[12] Notice of Department Reassignment

09/08/2020

Case Reassigned to Department 3

Case Reassignment from Judge Tierra Jones to Judge Douglas W. Herndon

01/04/2021

Administrative Reassignment - Judicial Officer Change

Judicial Reassignment to Judge Monica Trujillo

04/19/2021



Order

[13] Third Amended Decision and Order on Motion to Adjudicate Lien

04/30/2021



Notice of Association of Counsel

Filed By: Plaintiff Edgeworth Family Trust; Plaintiff American Grating, LLC

[14] Notice of Association of Counsel

06/17/2021










Decision and Order

Filed By: Defendant Simon, Daniel S.

[15] Decison and Order Denying Edgeworth's Motion for Order Releasing Client Funds & Requiring Production of Complete File

CASE SUMMARY

CASE NO. A-18-767242-C

06/18/2021	 Notice of Entry Filed By: Defendant Simon, Daniel S. <i>[16] NOTICE OF ENTRY OF DECISION AND ORDER DENYING EDGEWORTH S MOTION FOR ORDER RELEASING CLIENT FUNDS AND REQUIRING PRODUCTION OF COMPLETE FILE</i>
06/18/2021	 Notice of Entry Filed By: Defendant Simon, Daniel S. <i>[17] NOTICE OF ENTRY OF DECISION AND ORDER DENYING PLAINTIFFS RENEWED MOTION FOR RECONSIDERATION OF THIRD- AMENDED DECISION AND ORDER ON MOTION TO ADJUDICATE LIEN AND DENYING SIMON S COUNTERMOTION TO ADJUDICATE LIEN ON REMAND</i>
07/01/2021	 Motion to Reconsider Filed By: Plaintiff Edgeworth Family Trust; Plaintiff American Grating, LLC <i>[18] 2021-07-01 Motion to Reconsider Order re Funds and File and Motion to Stay Enforcement of Judgments</i>
07/17/2021	 Reply Filed by: Plaintiff American Grating, LLC <i>[19] Reply ISO Motion to Reconsider Order re Funds and File</i>
07/17/2021	 Notice of Appeal Filed By: Plaintiff American Grating, LLC <i>[20] Notice of Appeal</i>
07/17/2021	 Case Appeal Statement Filed By: Plaintiff American Grating, LLC <i>[21] Edgeworth Family Trust and American Grating LLC's Case Appeal Statement</i>
<u>DISPOSITIONS</u>	
02/08/2019	Order (Judicial Officer: Jones, Tierra) Debtors: Edgeworth Family Trust (Plaintiff), American Grating, LLC (Plaintiff) Creditors: Daniel S. Simon (Defendant) Judgment: 02/08/2019, Docketed: 02/08/2019 Total Judgment: 55,000.00 Comment: Filed in A738444 Granted In Part
04/19/2021	Judgment (Judicial Officer: Jones, Tierra) Debtors: Edgeworth Family Trust (Plaintiff), American Grating, LLC (Plaintiff) Creditors: Law Office of Daniel S Simon (Defendant) Judgment: 04/19/2021, Docketed: 04/21/2021 Total Judgment: 556,577.43
<u>HEARINGS</u>	
01/30/2018	 Motion to Consolidate (9:30 AM) (Judicial Officer: Jones, Tierra) 01/30/2018, 02/06/2018 <i>Defendant Daniel S. Simon's Motion to Consolidate on Order Shortening Time</i> Continued; Granted; Journal Entry Details: <i>Plaintiffs' Joint Motion for Determination of Good Faith Settlement...Status Check: Settlement Documents....Defendant Daniel S. Simon, d/b/a Simon Law's Motion to Consolidate on Order Shortening Time...Defendant Daniel S. Simon d/b/a Simon Law's Motion to Adjudicate Attorney Lien of the Law Office Daniel Simon PC; Order Shortening Time APPEARANCES CONTINUED: Mr. Parker Esq., present via Court Call, on behalf of Lange Plumbing. Robert Vannah Esq., and John Greene on behalf of Edgeworth Family Trust, and Peter Christiansen Esq., on behalf of Daniel Simon. There being no opposition, COURT ORDERED, Plaintiffs'</i>

EIGHTH JUDICIAL DISTRICT COURT

CASE SUMMARY

CASE NO. A-18-767242-C

Joint Motion for Determination of Good Faith Settlement, GRANTED. Upon Court's inquiry as to the settlement documents, Ms. Pancoast advised the checks were issued long ago from the Viking entities. Further counsel has a stipulation she brought today to get signatures to get Viking out. Further, Mr. Simon did sign a dismissal to get Viking out. However, they would like to get this wrapped up. Mr. Christensen advised the closing documents for Lange took some time. Further, they have been signed by the client yesterday, and provided to Mr. Simon. Mr. Vannah, advised they signed everything yesterday and the underlying case is about to be dismissed. Colloquy regarding stipulation. Mr. Parker advised the Good Faith Settlement determination as well as the stipulation they will be signing, include the resolution of all claims between the defendant, the crossclaims and any additional insured obligations the defendants may of had amongst each other, as well as the cross-plaintiff's claims. All parties agreed. Further, Mr. Parker advised they do have their settlement check and he will have it sent over to Mr. Simon's office in exchange for the settlement documents. Court noted the stipulation can be signed when the check is exchanged. Defendant Daniel S. Simon, d/b/a Simon Law's Motion to Consolidate on Order Shortening Time, Following arguments by counsel, COURT ORDERED, Matters CONTINUED to this Court's Chamber's calendar for Decision on the date given. Further, COURT ORDERED, matter set for status check on settlement documents on the date given. 02/08/18 (CHAMBERS) Decision: Defendant Daniel S. Simon, d/b/a Simon Law's Motion to Consolidate on Order Shortening Time...Defendant Daniel S. Simon d/b/a Simon Law's Motion to Adjudicate Attorney Lien of the Law Office Daniel Simon PC; Order Shortening Time 02/20/18 9:30 A.M. STATUS CHECK: SETTLEMENT DOCUMENTS; Continued;

Granted;

Journal Entry Details:

No parties present. Court noted the case in front of this dept. is Edgeworth Family Trust vs. Lange Plumbing, and the case of Edgeworth Family Trust vs. Daniel Simon is actually in front of Judge Sturman. However, this is on for a motion to consolidate and the Court did get a request that this motion get continued with the other motions. COURT ORDERED, matter CONTINUED to the date given. 02/06/18 9:30 A.M. Defendant Daniel S. Simon's Motion to Consolidate on Order Shortening Time;

03/13/2018

CANCELED Motion to Dismiss (9:30 AM) (Judicial Officer: Sturman, Gloria)
Vacated - Subordinate Case
Motion to Dismiss Plaintiffs' Complaint Pursuant to NRCP 12(b)(5)

DATE

FINANCIAL INFORMATION

Defendant Simon, Daniel S.

Total Charges

223.00

Total Payments and Credits

223.00

Balance Due as of 7/20/2021

0.00

Plaintiff American Grating, LLC

Total Charges

24.00

Total Payments and Credits

24.00

Balance Due as of 7/20/2021

0.00

Plaintiff Edgeworth Family Trust

Total Charges

750.00

Total Payments and Credits

750.00

Balance Due as of 7/20/2021

0.00

DISTRICT COURT CIVIL COVER SHEET

Department 14

County, Nevada

Case No. _____
(Assigned by Clerk's Office)**I. Party Information** (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone): EDGEWORTH FAMILY TRUST; AMERICAN GRATING, LLC	Defendant(s) (name/address/phone): DANIEL S. SIMON, d/b/a SIMON LAW
Attorney (name/address/phone): ROBERT D. VANNAH, ESQ. 400 S. Seventh Street, 4th Floor Las Vegas, Nevada 89101	Attorney (name/address/phone):

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

Real Property Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	Negligence <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Torts Other Torts <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 Probate (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 Estate Value <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	Construction Defect & Contract Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <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 checked="" type="checkbox"/> Other Contract	Judicial Review/Appeal Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ Civil Writ <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		Other Civil Filing Other Civil Filing <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.

January 3, 2018
Date[Signature]
Signature of initiating party or representative

See other side for family-related case filings.

Heather S. Simon

CLERK OF THE COURT

ORDR

James R. Christensen Esq.
Nevada Bar No. 3861

JAMES R. CHRISTENSEN PC

601 S. 6th Street
Las Vegas NV 89101
(702) 272-0406

-and-

Peter S. Christiansen, Esq.
Nevada Bar No. 5254

CHRISTIENSEN TRIAL LAWYERS

701 S. 7th Street
Las Vegas, NV 89101
(702) 240-7979
Attorneys for SIMON

**Eighth Judicial District Court
District of Nevada**

EDGEWORTH FAMILY TRUST; and
AMERICAN GRATING, LLC

Plaintiffs,

vs.

LANGE PLUMBING, LLC; THE VIKING
CORPORTATION, a Michigan corporation;
SUPPLY NETWORK, INC., dba VIKING
SUPPLYNET, a Michigan Corporation; and
DOES 1 through 5; and, ROE entities 6 through
10;
Defendants.

EDGEWORTH FAMILY TRUST;
AMERICAN GRATING, LLC

Plaintiffs,

vs.

DANIEL S. SIMON; THE LAW OFFICE OF
DANIEL S. SIMON, a Professional Corporation
d/b/a SIMON LAW; DOES 1 through 10; and,
ROE entities 1 through 10;

Defendants.

CASE NO.: A-18-767242-C
DEPT NO.: XXVI

Consolidated with

CASE NO.: A-16-738444-C
DEPT NO.: X

**DECISION AND ORDER DENYING
PLAINTIFFS' RENEWED MOTION FOR
RECONSIDERATION OF THIRD-
AMENDED DECISION AND ORDER ON
MOTION TO ADJUDICATE LIEN AND
DENYING SIMON'S COUNTERMOTION
TO ADJUDICATE LIEN ON REMAND**

1 **DECISION AND ORDER DENYING PLAINTIFFS’ RENEWED MOTION FOR**
2 **RECONSIDERATION OF THIRD- AMENDED DECISION AND ORDER ON MOTION**
3 **TO ADJUDICATE LIEN AND DENYING SIMON’S COUNTERMOTION TO**
4 **ADJUDICATE LIEN ON REMAND**

5 This matter came on for hearing on May 27, 2021, in the Eighth Judicial
6 District Court, Clark County, Nevada, the Honorable Tierra Jones presiding.
7 Defendants, Daniel Simon and Law Office of Daniel S. Simon d/b/a Simon Law
8 (jointly the “Defendants” or “Simon”) having appeared by and through their
9 attorneys of record, James Christensen, Esq. and Peter Christiansen, Esq.; and,
10 Plaintiff Edgeworth Family Trust and American Grating, (“Plaintiff” or
11 “Edgeworths”) having appeared through by and through their attorneys of record,
12 the law firm of Morris Law Group, Steve Morris, Esq. and Rosa Solis-Rainey, Esq.
13 The Court having considered the evidence, arguments of counsel and being fully
14 advised of the matters herein, the **COURT FINDS** after review:

15 The Edgeworths’ Renewed Motion for Reconsideration of Third Amended
16 Decision and Order on Motion to Adjudicate Lien is DENIED.

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

Simon's Countermotion to Adjudicate the Lien on Remand is DENIED.

Dated this 17th day of June, 2021

IT IS SO ORDERED.



DISTRICT COURT JUDGE

478 B49 725D 8E26

Tierra Jones

District Court Judge

Submitted By:

Approved as to Form and Content:

JAMES R. CHRISTENSEN PC

MORRIS LAW GROUP

/s/ James R. Christensen

James R. Christensen Esq.

Nevada Bar No. 3861

601 S. 6th Street

Las Vegas NV 89101

Attorney for SIMON

Declined

Steve Morris Esq.

Nevada Bar No. 1543

801 S. Rancho Drive, Ste. B4

Las Vegas NV 89106

Attorney for EDGEWORTHS

1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Edgeworth Family Trust,
7 Plaintiff(s)

CASE NO: A-16-738444-C

8 vs.

DEPT. NO. Department 10

9 Lange Plumbing, L.L.C.,
10 Defendant(s)

11 **AUTOMATED CERTIFICATE OF SERVICE**

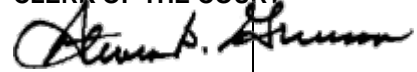
12
13 This automated certificate of service was generated by the Eighth Judicial District
14 Court. The foregoing Order was served via the court's electronic eFile system to all
recipients registered for e-Service on the above entitled case as listed below:

15 Service Date: 6/17/2021

16 Daniel Simon .	lawyers@simonlawlv.com
17 Rhonda Onorato .	ronorato@rlattorneys.com
18 Mariella Dumbrique	mdumbrique@blacklobello.law
19 Michael Nunez	mnunez@murchisonlaw.com
20 Tyler Ure	ngarcia@murchisonlaw.com
21 Nicole Garcia	ngarcia@murchisonlaw.com
22 Bridget Salazar	bsalazar@vannahlaw.com
23 John Greene	jgreene@vannahlaw.com
24 James Christensen	jim@jchristensenlaw.com
25 Daniel Simon	dan@danielsimonlaw.com

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27
28

1	Michael Nunez	mnunez@murchisonlaw.com
2	Gary Call	gcall@rlattorneys.com
3	J. Graf	Rgraf@blacklobello.law
4	Robert Vannah	rvannah@vannahlaw.com
5	Christine Atwood	catwood@messner.com
6	Lauren Calvert	lcalvert@messner.com
7	James Alvarado	jalvarado@messner.com
8	Christopher Page	chrispage@vannahlaw.com
9	Nicholle Pendergraft	npendergraft@messner.com
10	Rosa Solis-Rainey	rsr@morrislawgroup.com
11	David Gould	dgould@messner.com
12	Steve Morris	sm@morrislawgroup.com
13	Traci Baez	tkb@morrislawgroup.com
14	Jessie Church	jchurch@vannahlaw.com
15	James Christensen	jim@jchristensenlaw.com
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NEO

James R. Christensen Esq.
Nevada Bar No. 3861

JAMES R. CHRISTENSEN PC

601 S. 6th Street
Las Vegas NV 89101
(702) 272-0406

-and-

Peter S. Christiansen, Esq.
Nevada Bar No. 5254

CHRISTIENSEN TRIAL LAWYERS

701 S. 7th Street
Las Vegas, NV 89101
(702) 240-7979
Attorneys for SIMON

**Eighth Judicial District Court
District of Nevada**

EDGEWORTH FAMILY TRUST; and
AMERICAN GRATING, LLC

Plaintiffs,

vs.

LANGE PLUMBING, LLC; THE VIKING
CORPORTATION, a Michigan corporation;
SUPPLY NETWORK, INC., dba VIKING
SUPPLYNET, a Michigan Corporation; and
DOES 1 through 5; and, ROE entities 6 through
10;
Defendants.

EDGEWORTH FAMILY TRUST;
AMERICAN GRATING, LLC

Plaintiffs,

vs.

DANIEL S. SIMON; THE LAW OFFICE OF
DANIEL S. SIMON, a Professional Corporation
d/b/a SIMON LAW; DOES 1 through 10; and,
ROE entities 1 through 10;

Defendants.

CASE NO.: A-18-767242-C
DEPT NO.: XXVI

Consolidated with

CASE NO.: A-16-738444-C
DEPT NO.: X

NOTICE OF ENTRY OF DECISION AND
ORDER DENYING PLAINTIFFS'
RENEWED MOTION FOR
RECONSIDERATION OF THIRD-
AMENDED DECISION AND ORDER ON
MOTION TO ADJUDICATE LIEN AND
DENYING SIMON'S COUNTERMOTION
TO ADJUDICATE LIEN ON REMAND

1 **NOTICE OF ENTRY OF DECISION AND ORDER DENYING PLAINTIFFS'**
2 **RENEWED MOTION FOR RECONSIDERATION OF THIRD- AMENDED DECISION**
3 **AND ORDER ON MOTION TO ADJUDICATE LIEN AND DENYING SIMON'S**
4 **COUNTERMOTION TO ADJUDICATE LIEN ON REMAND**

5 PLEASE TAKE NOTICE, a Decision and Order Denying Plaintiffs' Renewed Motion
6 for Reconsideration of Third-Amended Decision and Order on Motion to Adjudicate Lien and
7 Denying Simon's Countermotion to Adjudicate Lien on Remand was entered on the 17th day of
8 June, 2021. A true and correct copy of the file-stamped Decision and Order is attached hereto.

9 DATED this 18th day of June, 2021.

10 **JAMES R. CHRISTENSEN PC**

11 /s/ James R. Christensen

12 James R. Christensen Esq.

13 Nevada Bar No. 3861

14 601 S. 6th Street

15 Las Vegas NV 89101

16 (702) 272-0406

17 -and-

18 Peter S. Christiansen, Esq.

19 Nevada Bar No. 5254

20 **CHRISTIANSSEN TRIAL LAWYERS**

21 701 S. 7th Street

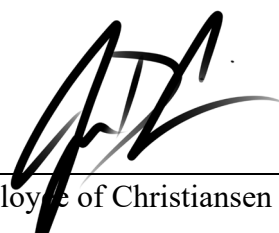
22 Las Vegas, NV 89101

23 (702)240-7979

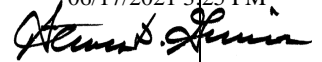
24 *Attorneys for SIMON*

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of CHRISTIANSEN TRIAL LAWYERS, and that on this 18th day of June, 2021 I caused the foregoing document entitled ***NOTICE OF ENTRY OF DECISION AND ORDER DENYING PLAINTIFFS' RENEWED MOTION FOR RECONSIDERATION OF THIRD- AMENDED DECISION AND ORDER ON MOTION TO ADJUDICATE LIEN AND DENYING SIMON'S COUNTERMOTION TO ADJUDICATE LIEN ON REMAND*** to be served upon those persons designated by the parties in the E-Service Master List for the above-referenced matter in the Eighth Judicial District Court eFiling System in accordance with the mandatory electronic service requirements of Administrative Order 14-2 and the Nevada Electronic Filing and Conversion Rules.



An employee of Christiansen Law Offices


CLERK OF THE COURT

ORDR

James R. Christensen Esq.
Nevada Bar No. 3861

JAMES R. CHRISTENSEN PC

601 S. 6th Street
Las Vegas NV 89101
(702) 272-0406

-and-

Peter S. Christiansen, Esq.
Nevada Bar No. 5254

CHRISTIENSEN TRIAL LAWYERS

701 S. 7th Street
Las Vegas, NV 89101
(702) 240-7979
Attorneys for SIMON

**Eighth Judicial District Court
District of Nevada**

EDGEWORTH FAMILY TRUST; and
AMERICAN GRATING, LLC

Plaintiffs,

vs.

LANGE PLUMBING, LLC; THE VIKING
CORPORTATION, a Michigan corporation;
SUPPLY NETWORK, INC., dba VIKING
SUPPLYNET, a Michigan Corporation; and
DOES 1 through 5; and, ROE entities 6 through
10;
Defendants.

EDGEWORTH FAMILY TRUST;
AMERICAN GRATING, LLC

Plaintiffs,

vs.

DANIEL S. SIMON; THE LAW OFFICE OF
DANIEL S. SIMON, a Professional Corporation
d/b/a SIMON LAW; DOES 1 through 10; and,
ROE entities 1 through 10;

Defendants.

CASE NO.: A-18-767242-C
DEPT NO.: XXVI

Consolidated with

CASE NO.: A-16-738444-C
DEPT NO.: X

**DECISION AND ORDER DENYING
PLAINTIFFS' RENEWED MOTION FOR
RECONSIDERATION OF THIRD-
AMENDED DECISION AND ORDER ON
MOTION TO ADJUDICATE LIEN AND
DENYING SIMON'S COUNTERMOTION
TO ADJUDICATE LIEN ON REMAND**

1 **DECISION AND ORDER DENYING PLAINTIFFS’ RENEWED MOTION FOR**
2 **RECONSIDERATION OF THIRD- AMENDED DECISION AND ORDER ON MOTION**
3 **TO ADJUDICATE LIEN AND DENYING SIMON’S COUNTERMOTION TO**
4 **ADJUDICATE LIEN ON REMAND**

5 This matter came on for hearing on May 27, 2021, in the Eighth Judicial
6 District Court, Clark County, Nevada, the Honorable Tierra Jones presiding.
7 Defendants, Daniel Simon and Law Office of Daniel S. Simon d/b/a Simon Law
8 (jointly the “Defendants” or “Simon”) having appeared by and through their
9 attorneys of record, James Christensen, Esq. and Peter Christiansen, Esq.; and,
10 Plaintiff Edgeworth Family Trust and American Grating, (“Plaintiff” or
11 “Edgeworths”) having appeared through by and through their attorneys of record,
12 the law firm of Morris Law Group, Steve Morris, Esq. and Rosa Solis-Rainey, Esq.
13 The Court having considered the evidence, arguments of counsel and being fully
14 advised of the matters herein, the **COURT FINDS** after review:

15 The Edgeworths’ Renewed Motion for Reconsideration of Third Amended
16 Decision and Order on Motion to Adjudicate Lien is DENIED.

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

Simon's Countermotion to Adjudicate the Lien on Remand is DENIED.

Dated this 17th day of June, 2021

IT IS SO ORDERED.



DISTRICT COURT JUDGE

478 B49 725D 8E26

Tierra Jones

District Court Judge

Submitted By:

Approved as to Form and Content:

JAMES R. CHRISTENSEN PC

MORRIS LAW GROUP

/s/ James R. Christensen

James R. Christensen Esq.

Nevada Bar No. 3861

601 S. 6th Street

Las Vegas NV 89101

Attorney for SIMON

Declined

Steve Morris Esq.

Nevada Bar No. 1543

801 S. Rancho Drive, Ste. B4

Las Vegas NV 89106

Attorney for EDGEWORTHS

1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Edgeworth Family Trust,
7 Plaintiff(s)

CASE NO: A-16-738444-C

8 vs.

DEPT. NO. Department 10

9 Lange Plumbing, L.L.C.,
10 Defendant(s)

11 **AUTOMATED CERTIFICATE OF SERVICE**

12
13 This automated certificate of service was generated by the Eighth Judicial District
14 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:

15 Service Date: 6/17/2021

16 Daniel Simon .	lawyers@simonlawlv.com
17 Rhonda Onorato .	ronorato@rlattorneys.com
18 Mariella Dumbrique	mdumbrique@blacklobello.law
19 Michael Nunez	mnunez@murchisonlaw.com
20 Tyler Ure	ngarcia@murchisonlaw.com
21 Nicole Garcia	ngarcia@murchisonlaw.com
22 Bridget Salazar	bsalazar@vannahlaw.com
23 John Greene	jgreene@vannahlaw.com
24 James Christensen	jim@jchristensenlaw.com
25 Daniel Simon	dan@danielsimonlaw.com

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1	Michael Nunez	mnunez@murchisonlaw.com
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5	Christine Atwood	catwood@messner.com
6	Lauren Calvert	lcalvert@messner.com
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10	Rosa Solis-Rainey	rsr@morrislawgroup.com
11	David Gould	dgould@messner.com
12	Steve Morris	sm@morrislawgroup.com
13	Traci Baez	tkb@morrislawgroup.com
14	Jessie Church	jchurch@vannahlaw.com
15	James Christensen	jim@jchristensenlaw.com
16		
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Heather S. Simon

CLERK OF THE COURT

ORDR

James R. Christensen Esq.
Nevada Bar No. 3861

JAMES R. CHRISTENSEN PC

601 S. 6th Street
Las Vegas NV 89101
(702) 272-0406

-and-

Peter S. Christiansen, Esq.
Nevada Bar No. 5254

CHRISTIENSEN TRIAL LAWYERS

701 S. 7th Street
Las Vegas, NV 89101
(702) 240-7979
Attorneys for SIMON

**Eighth Judicial District Court
District of Nevada**

EDGEWORTH FAMILY TRUST; and
AMERICAN GRATING, LLC

Plaintiffs,

vs.

LANGE PLUMBING, LLC; THE VIKING
CORPORTATION, a Michigan corporation;
SUPPLY NETWORK, INC., dba VIKING
SUPPLYNET, a Michigan Corporation; and
DOES 1 through 5; and, ROE entities 6 through
10;
Defendants.

EDGEWORTH FAMILY TRUST;
AMERICAN GRATING, LLC

Plaintiffs,

vs.

DANIEL S. SIMON; THE LAW OFFICE OF
DANIEL S. SIMON, a Professional Corporation
d/b/a SIMON LAW; DOES 1 through 10; and,
ROE entities 1 through 10;

Defendants.

CASE NO.: A-18-767242-C
DEPT NO.: XXVI

Consolidated with

CASE NO.: A-16-738444-C
DEPT NO.: X

**DECISION AND ORDER DENYING
EDGEWORTH'S MOTION FOR ORDER
RELEASING CLIENT FUNDS AND
REQUIRING PRODUCTION OF
COMPLETE FILE**

1 **DECISION AND ORDER DENYING EDGEWORTH'S MOTION FOR ORDER**
2 **RELEASING CLIENT FUNDS AND REQUIRING PRODUCTION**
3 **OF COMPLETE FILE**

4 This matter came on for hearing on May 27, 2021, in the Eighth Judicial
5 District Court, Clark County, Nevada, the Honorable Tierra Jones presiding.
6 Defendants, Daniel Simon and Law Office of Daniel S. Simon d/b/a Simon Law
7 (jointly the "Defendants" or "Simon") having appeared by and through their
8 attorneys of record, James Christensen, Esq. and Peter Christiansen, Esq.; and,
9 Plaintiff Edgeworth Family Trust and American Grating, ("Plaintiff" or
10 "Edgeworths") having appeared through by and through their attorneys of record,
11 the law firm of Morris Law Group, Steve Morris, Esq. and Rosa Solis-Rainey, Esq.
12 The Court having considered the evidence, arguments of counsel and being fully
13 advised of the matters herein, the **COURT FINDS** after review:
14

15 The Motion for Order Releasing Client funds and Requiring Production of
16 Complete file is DENIED.
17

18 The Court finds that the Motion is premature regarding the releasing of
19 client funds, as the litigation in this case is still ongoing at this time because the
20 Court has not issued a final order in this matter and the time for appeal has not run.
21

22 The Court further finds and orders that there is a bilateral agreement to hold
23 the disputed funds in an interest-bearing account at the bank and until new details
24 are agreed upon to invalidate said agreement and a new agreement is reached, the
25

1 bilateral agreement is controlling and the disputed funds will remain in accordance
2 with the agreement.

3 The Court further finds that the issue of requiring the production of the
4 complete file is prevented by the Non-Disclosure Agreement (NDA) and the
5 request is DENIED.
6

7 IT IS SO ORDERED.

Dated this 17th day of June, 2021

8
9
10 
11 _____
12 DISTRICT COURT JUDGE

13 **D0B 497 4775 23BB**
Tierra Jones
District Court Judge

14 Submitted By:

15 **JAMES R. CHRISTENSEN PC**

16
17 /s/ James R. Christensen
18 James R. Christensen Esq.
19 Nevada Bar No. 3861
20 601 S. 6th Street
21 Las Vegas NV 89101
22 Attorney for SIMON

Approved as to Form and Content:

15 **MORRIS LAW GROUP**

16
17 Declined
18 Steve Morris Esq.
19 Nevada Bar No. 1543
20 801 S. Rancho Drive, Ste. B4
21 Las Vegas NV 89106
22 Attorney for EDGEWORTHS

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

4
5
6 Edgeworth Family Trust,
Plaintiff(s)

CASE NO: A-18-767242-C

7 vs.

DEPT. NO. Department 10

8 Daniel Simon, Defendant(s)
9

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: 6/17/2021

15 Peter Christiansen

pete@christiansenlaw.com

16 Whitney Barrett

wbarrett@christiansenlaw.com

17 Kendelea Leascher Works

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18 R. Todd Terry

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19 Keely Perdue

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20 Jonathan Crain

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21 David Clark

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22 Susana Nutt

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23 Debra Marquez

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24 Chandi Melton

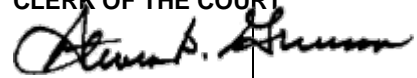
chandi@christiansenlaw.com

25 Bridget Salazar

bsalazar@vannahlaw.com

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1	John Greene	jgreene@vannahlaw.com
2	James Christensen	jim@jchristensenlaw.com
3	Robert Vannah	rvannah@vannahlaw.com
4	Candice Farnsworth	candice@christiansenlaw.com
5	Daniel Simon	lawyers@simonlawlv.com
6	Esther Barrios Sandoval	esther@christiansenlaw.com
7	Christine Atwood	catwood@messner.com
8	Lauren Calvert	lcalvert@messner.com
9	James Alvarado	jalvarado@messner.com
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12	David Gould	dgould@messner.com
13	Steve Morris	sm@morrislawgroup.com
14	Traci Baez	tkb@morrislawgroup.com
15	Jessie Church	jchurch@vannahlaw.com
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NEO

James R. Christensen Esq.
Nevada Bar No. 3861

JAMES R. CHRISTENSEN PC

601 S. 6th Street
Las Vegas NV 89101
(702) 272-0406

-and-

Peter S. Christiansen, Esq.
Nevada Bar No. 5254

CHRISTIENSEN TRIAL LAWYERS

701 S. 7th Street
Las Vegas, NV 89101
(702)240-7979
Attorneys for SIMON

**Eighth Judicial District Court
District of Nevada**

EDGEWORTH FAMILY TRUST; and
AMERICAN GRATING, LLC

Plaintiffs,

vs.

LANGE PLUMBING, LLC; THE VIKING
CORPORTATION, a Michigan corporation;
SUPPLY NETWORK, INC., dba VIKING
SUPPLYNET, a Michigan Corporation; and
DOES 1 through 5; and, ROE entities 6 through
10;
Defendants.

EDGEWORTH FAMILY TRUST;
AMERICAN GRATING, LLC

Plaintiffs,

vs.

DANIEL S. SIMON; THE LAW OFFICE OF
DANIEL S. SIMON, a Professional Corporation
d/b/a SIMON LAW; DOES 1 through 10; and,
ROE entities 1 through 10;

Defendants.

CASE NO.: A-18-767242-C
DEPT NO.: XXVI

Consolidated with

CASE NO.: A-16-738444-C
DEPT NO.: X

**NOTICE OF ENTRY OF DECISION AND
ORDER DENYING EDGEWORTH'S
MOTION FOR ORDER RELEASING
CLIENT FUNDS AND REQUIRING
PRODUCTION OF COMPLETE FILE**

1 **NOTICE OF ENTRY OF DECISION AND ORDER DENYING EDGEWORTH'S**
2 **MOTION FOR ORDER RELEASING CLIENT FUNDS AND REQUIRING**
3 **PRODUCTION OF COMPLETE FILE**

4 PLEASE TAKE NOTICE, a Decision and Order Denying Edgeworth's Motion for Order
5 Releasing Client Funds and Requiring Production of Complete File was entered on the 17th day
6 of June, 2021. A true and correct copy of the file-stamped Decision and Order is attached hereto.

7 DATED this 18th day of June, 2021.

8 **JAMES R. CHRISTENSEN PC**

9 /s/ James R. Christensen

10 James R. Christensen Esq.

11 Nevada Bar No. 3861

12 601 S. 6th Street

13 Las Vegas NV 89101

14 (702) 272-0406

15 -and-

16 Peter S. Christiansen, Esq.

17 Nevada Bar No. 5254

18 **CHRISTIENSEN TRIAL LAWYERS**

19 701 S. 7th Street

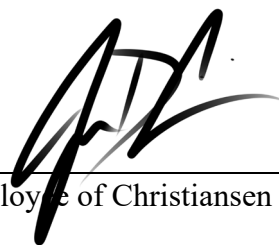
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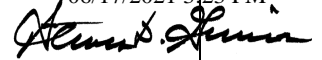
22 Attorneys for SIMON

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of CHRISTIANSEN TRIAL LAWYERS, and that on this 18th day of June, 2021 I caused the foregoing document entitled ***NOTICE OF ENTRY OF DECISION AND ORDER DENYING EDGEWORTH'S MOTION FOR ORDER RELEASING CLIENT FUNDS AND REQUIRING PRODUCTION OF COMPLETE FILE*** to be served upon those persons designated by the parties in the E-Service Master List for the above-referenced matter in the Eighth Judicial District Court eFiling System in accordance with the mandatory electronic service requirements of Administrative Order 14-2 and the Nevada Electronic Filing and Conversion Rules.



An employee of Christiansen Law Offices


CLERK OF THE COURT

ORDR

James R. Christensen Esq.
Nevada Bar No. 3861

JAMES R. CHRISTENSEN PC

601 S. 6th Street
Las Vegas NV 89101
(702) 272-0406

-and-

Peter S. Christiansen, Esq.
Nevada Bar No. 5254

CHRISTIENSEN TRIAL LAWYERS

701 S. 7th Street
Las Vegas, NV 89101
(702) 240-7979
Attorneys for SIMON

**Eighth Judicial District Court
District of Nevada**

EDGEWORTH FAMILY TRUST; and
AMERICAN GRATING, LLC

Plaintiffs,

vs.

LANGE PLUMBING, LLC; THE VIKING
CORPORTATION, a Michigan corporation;
SUPPLY NETWORK, INC., dba VIKING
SUPPLYNET, a Michigan Corporation; and
DOES 1 through 5; and, ROE entities 6 through
10;
Defendants.

EDGEWORTH FAMILY TRUST;
AMERICAN GRATING, LLC

Plaintiffs,

vs.

DANIEL S. SIMON; THE LAW OFFICE OF
DANIEL S. SIMON, a Professional Corporation
d/b/a SIMON LAW; DOES 1 through 10; and,
ROE entities 1 through 10;

Defendants.

CASE NO.: A-18-767242-C
DEPT NO.: XXVI

Consolidated with

CASE NO.: A-16-738444-C
DEPT NO.: X

**DECISION AND ORDER DENYING
EDGEWORTH'S MOTION FOR ORDER
RELEASING CLIENT FUNDS AND
REQUIRING PRODUCTION OF
COMPLETE FILE**

1 **DECISION AND ORDER DENYING EDGEWORTH'S MOTION FOR ORDER**
2 **RELEASING CLIENT FUNDS AND REQUIRING PRODUCTION**
3 **OF COMPLETE FILE**

4 This matter came on for hearing on May 27, 2021, in the Eighth Judicial
5 District Court, Clark County, Nevada, the Honorable Tierra Jones presiding.
6 Defendants, Daniel Simon and Law Office of Daniel S. Simon d/b/a Simon Law
7 (jointly the "Defendants" or "Simon") having appeared by and through their
8 attorneys of record, James Christensen, Esq. and Peter Christiansen, Esq.; and,
9 Plaintiff Edgeworth Family Trust and American Grating, ("Plaintiff" or
10 "Edgeworths") having appeared through by and through their attorneys of record,
11 the law firm of Morris Law Group, Steve Morris, Esq. and Rosa Solis-Rainey, Esq.
12 The Court having considered the evidence, arguments of counsel and being fully
13 advised of the matters herein, the **COURT FINDS** after review:
14

15 The Motion for Order Releasing Client funds and Requiring Production of
16 Complete file is DENIED.
17

18 The Court finds that the Motion is premature regarding the releasing of
19 client funds, as the litigation in this case is still ongoing at this time because the
20 Court has not issued a final order in this matter and the time for appeal has not run.
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22 The Court further finds and orders that there is a bilateral agreement to hold
23 the disputed funds in an interest-bearing account at the bank and until new details
24 are agreed upon to invalidate said agreement and a new agreement is reached, the
25

1 bilateral agreement is controlling and the disputed funds will remain in accordance
2 with the agreement.

3 The Court further finds that the issue of requiring the production of the
4 complete file is prevented by the Non-Disclosure Agreement (NDA) and the
5 request is DENIED.
6

7 IT IS SO ORDERED.

Dated this 17th day of June, 2021

8
9
10 
11 _____
12 DISTRICT COURT JUDGE

13 **D0B 497 4775 23BB**
Tierra Jones
District Court Judge

14 Submitted By:

15 **JAMES R. CHRISTENSEN PC**

16
17 /s/ James R. Christensen
18 James R. Christensen Esq.
19 Nevada Bar No. 3861
20 601 S. 6th Street
21 Las Vegas NV 89101
22 Attorney for SIMON

Approved as to Form and Content:

15 **MORRIS LAW GROUP**

16
17 Declined
18 Steve Morris Esq.
19 Nevada Bar No. 1543
20 801 S. Rancho Drive, Ste. B4
21 Las Vegas NV 89106
22 Attorney for EDGEWORTHS

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

4
5
6 Edgeworth Family Trust,
Plaintiff(s)

CASE NO: A-18-767242-C

7 vs.

DEPT. NO. Department 10

8
9 Daniel Simon, 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: 6/17/2021

15 Peter Christiansen	pete@christiansenlaw.com
16 Whitney Barrett	wbarrett@christiansenlaw.com
17 Kendelea Leascher Works	kworks@christiansenlaw.com
18 R. Todd Terry	tterry@christiansenlaw.com
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21 David Clark	dclark@lipsonneilson.com
22 Susana Nutt	snutt@lipsonneilson.com
23 Debra Marquez	dmarquez@lipsonneilson.com
24 Chandi Melton	chandi@christiansenlaw.com
25 Bridget Salazar	bsalazar@vannahlaw.com

1	John Greene	jgreene@vannahlaw.com
2	James Christensen	jim@jchristensenlaw.com
3	Robert Vannah	rvannah@vannahlaw.com
4	Candice Farnsworth	candice@christiansenlaw.com
5	Daniel Simon	lawyers@simonlawlv.com
6	Esther Barrios Sandoval	esther@christiansenlaw.com
7	Christine Atwood	catwood@messner.com
8	Lauren Calvert	lcalvert@messner.com
9	James Alvarado	jalvarado@messner.com
10	Nicholle Pendergraft	npendergraft@messner.com
11	Rosa Solis-Rainey	rsr@morrislawgroup.com
12	David Gould	dgould@messner.com
13	Steve Morris	sm@morrislawgroup.com
14	Traci Baez	tkb@morrislawgroup.com
15	Jessie Church	jchurch@vannahlaw.com
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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Contract

COURT MINUTES

January 30, 2018

A-18-767242-C Edgeworth Family Trust, Plaintiff(s)
vs.
Daniel Simon, Defendant(s)

January 30, 2018 9:30 AM Motion to Consolidate

HEARD BY: Jones, Tierra **COURTROOM:** RJC Courtroom 14B

COURT CLERK: Teri Berkshire

RECORDER: Victoria Boyd

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- No parties present. Court noted the case in front of this dept. is Edgeworth Family Trust vs. Lange Plumbing, and the case of Edgeworth Family Trust vs. Daniel Simon is actually in front of Judge Sturman. However, this is on for a motion to consolidate and the Court did get a request that this motion get continued with the other motions. COURT ORDERED, matter CONTINUED to the date given.

02/06/18 9:30 A.M. Defendant Daniel S. Simon's Motion to Consolidate on Order Shortening Time

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Contract

COURT MINUTES

February 06, 2018

A-18-767242-C	Edgeworth Family Trust, Plaintiff(s)
	vs.
	Daniel Simon, Defendant(s)

February 06, 2018 9:30 AM Motion to Consolidate

HEARD BY: Jones, Tierra **COURTROOM:** RJC Courtroom 14B

COURT CLERK: Teri Berkshire

RECORDER: Victoria Boyd

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- Plaintiffs' Joint Motion for Determination of Good Faith Settlement...Status Check: Settlement Documents....Defendant Daniel S. Simon, d/b/a Simon Law's Motion to Consolidate on Order Shortening Time...Defendant Daniel S. Simon d/b/a Simon Law's Motion to Adjudicate Attorney Lien of the Law Office Daniel Simon PC; Order Shortening Time

APPEARANCES CONTINUED: Mr. Parker Esq., present via Court Call, on behalf of Lange Plumbing. Robert Vannah Esq., and John Greene on behalf of Edgeworth Family Trust, and Peter Christiansen Esq., on behalf of Daniel Simon.

There being no opposition, COURT ORDERED, Plaintiffs' Joint Motion for Determination of Good Faith Settlement, GRANTED. Upon Court's inquiry as to the settlement documents, Ms. Pancoast advised the checks were issued long ago from the Viking entities. Further counsel has a stipulation she brought today to get signatures to get Viking out. Further, Mr. Simon did sign a dismissal to get Viking out. However, they would like to get this wrapped up. Mr. Christensen advised the closing documents for Lange took some time. Further, they have been signed by the client yesterday, and provided to Mr. Simon. Mr. Vannah, advised they signed everything yesterday and the underlying case is about to be dismissed. Colloquy regarding stipulation. Mr. Parker advised the Good Faith

Settlement determination as well as the stipulation they will be signing, include the resolution of all claims between the defendant, the crossclaims and any additional insured obligations the defendants may have had amongst each other, as well as the cross-plaintiff's claims. All parties agreed. Further, Mr. Parker advised they do have their settlement check and he will have it sent over to Mr. Simon's office in exchange for the settlement documents. Court noted the stipulation can be signed when the check is exchanged.

Defendant Daniel S. Simon, d/b/a Simon Law's Motion to Consolidate on Order Shortening Time, Following arguments by counsel, COURT ORDERED, Matters CONTINUED to this Court's Chamber's calendar for Decision on the date given. Further, COURT ORDERED, matter set for status check on settlement documents on the date given.

02/08/18 (CHAMBERS) Decision: Defendant Daniel S. Simon, d/b/a Simon Law's Motion to Consolidate on Order Shortening Time...Defendant Daniel S. Simon d/b/a Simon Law's Motion to Adjudicate Attorney Lien of the Law Office Daniel Simon PC; Order Shortening Time

02/20/18 9:30 A.M. STATUS CHECK: SETTLEMENT DOCUMENTS

PLAINTIFFS' EXHIBIT LIST FOR EVIDENTIARY HEARING

Edgeworth, Clark County District Court Case No. A-16-738444-c Consolidated with A-18-767242-C

	EXHIBIT	OFFERED	OBJECTION	ADMITTED
1.	Edgeworth's affidavits (Bates Exhibit 01-000001- 000023)	Y	Stip	8-27-18
2.	Simon's invoices paid on December 16, 2016; May 3, 2017; August 16, 2017; September 10, 2017; (Bates Exhibit 02-000001- 000031)	↓	↓	↓
3.	A copy of the email from Edgeworth to Simon labeled Contingency and dated August 22, 2017. (Bates Exhibit 03-000001)	↓	↓	↓
4.	Letters from Simon dated November 27, 2017 (w/ Retainer Agreement) and December 7, 2017. (Bates Exhibit 04-000001- 000009)	↓	↓	↓
5.	Simon's Invoices produced on January 24, 2018. (Bates Exhibit 05-000001- 000183)	↓	↓	↓
6.	Excerpts from Edgeworth's deposition (where Simon admits that all invoices have been produced to date). (Bates Exhibit 06-000001- 000003)	↓	↓	↓
7.	Amended Lien (Bates Exhibit 07-000001- 000004)	↓	↓	↓
8.	Plaintiffs 16.1 Disclosures with calculations of damages served in the Litigation. (Bates Exhibit 08-000001- 000077)	↓	↓	↓
9. x	MISC Documents:	↓	↓	↓
	- Email dated 7/25/17 (Exhibit 09-000001)	↓	↓	↓
	- Email dated 11/15/17 (Exhibit 09-000002)	↓	↓	↓
	- Baker Hostetler fees (Exhibit 09-000003)	↓	↓	↓
	- Howard & Howard fees (Exhibit 09-000004) obj	↓	↓	NO
	- Sample Hourly Fee Agreement (Exhibit 09-000005 - 000006)	Y ↓	Stip ↓	↓
	- Summary/Comparison of fees paid versus new fees billed (Exhibit 09-000007 - 0000012)	↓	↓	↓

10 letter, Text Msg

8-30-18

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8-30-18

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Page 1 of 1

8-30-18

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8-30-18

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11 E-mail Re Settlement

EXHIBITS

A738444/
CASE NO. A767242

Exhibit Sheet S-01/jh

DEFENDANT'S EXHIBIT LIST FOR AUGUST 27, 2018
EVIDENTIARY HEARING

<u>NO.</u>	<u>DESCRIPTION</u>	<u>Offered</u>	<u>Admitted</u>	<u>Date</u>
1	Declaration of Will Kemp (SIMONEH0000001-0000008)	Y	Skp	8-27-18
2	Declaration of David Clark (SIMONEH0000009-0000019)			
3	Notice of Attorney's Lien with certified return receipt cards (SIMONEH0000020-0000028)			
4	Notice of Amended Attorney's Lien with certified return receipt cards (SIMONEH0000029-0000035)			
5	Executed Release and Settlement Checks from Viking (SIMONEH0000036-0000044)			
6	Executed Releases and Settlement Checks from Lange Plumbing (SIMONEH0000045-0000061)			
7	Memorandum of Costs (SIMONEH0000062-0000125)			
8	December 2, 2016 Invoice (SIMONEH0000126-0000129)			
9	April 7, 2017 Invoice (SIMONEH0000130-0000135)			
10	July 28, 2017 Invoice (SIMONEH0000136-0000146)			
11	September 19, 2017 Invoice (SIMONEH0000147-0000156)			
12	Summary of Payments and Supporting Checks (SIMONEH0000157-0000161)			
13	Invoice for Daniel S. Simon (SIMONEH0000162-0000240)			
14	Invoice for Ashley M. Ferrel (SIMONEH0000241-0000342)			
15	Invoice for Benjamin J. Miller (SIMONEH0000343-0000344)			
16	Affidavit of Brian Edgeworth, dated February 2, 2018 (SIMONEH0000345-0000350)			
17	Affidavit of Brian Edgeworth, dated February 12, 2018 (SIMONEH0000351-0000359)			
18	Affidavit of Brian Edgeworth, dated March 15, 2018 (SIMONEH0000360-0000369)			

		ver	Admit	date
19	Complaint for Case No. A-18-767242-C (SIMONEH0000370-0000379)	Y	Stip	8-27-18
20	Amended Complaint for Case No. A-18-767242-C (SIMONEH0000380-0000391)			
21	Details from the Secretary of State Page regarding the Law Office of Daniel Simon, PC (SIMONEH0000392-0000393)			
22	Details from the Fictitious Firm Name for Clark County (SIMONEH0000394)			
23	May 27, 2016 Email Chain between Daniel Simon and Brian Edgeworth regarding "Insurance Claim" (SIMONEH0000395)			
24	April 18, 2017 Email from Brian Edgeworth to Daniel Simon regarding Bill for Restoration (SIMONEH0000396)			
25	April 20, 2017 Email from Daniel Simon regarding representation of Giberti (SIMONEH0000397)			
26	August 1, 2017 Email from Daniel Simon to Brian Edgeworth regarding Edgeworth Invoices (SIMONEH0000398)			
27	August 22, 2017 Email from Brian Edgeworth to Daniel Simon regarding "Contingency" (SIMONEH0000399)			
28	August 23, 2017 Email from Brian Edgeworth to Daniel Simon regarding settlement (SIMONEH0000400)			
29	August 29, 2017 Email from Daniel Simon to Brian Edgeworth regarding Edgeworth Case (SIMONEH0000401)			
30	September 5, 2017 Email from Brian Edgeworth to Daniel Simon regarding Margaret Ho Loan (SIMONEH0000402)			
31	September 22, 2017 Email from Daniel Simon to Brian Edgeworth with invoices and billing summaries attached (SIMONEH0000403)			
32	September 30, 2017 Email from Michael Nunez to Daniel Simon regarding Motion to strike (SIMONEH0000404)			
33	September 30, 2017 Email from Brian Edgeworth to Daniel Simon regarding punitive damages (SIMONEH0000405)			
34	October 5, 2017 Email from Brian Edgeworth to Daniel Simon regarding settlement tolerance (SIMONEH0000406- 0000407)			

		OFR Admit Date		
35	October 10, 2017 Email from Brian Edgeworth to Daniel Simon regarding "let's go hard at Lange" (SIMONEH0000408)	Y	Stip	8-27-18
36	November 11, 2017 Email from Brian Edgeworth to Daniel Simon regarding Mediator's proposal (SIMONEH0000409)			
37	November 13, 2017 Email from Brian Edgeworth to Daniel Simon and Ashley Ferrel regarding Viking's Motion for Settlement Conference (SIMONEH0000410-0000411)			
38	November 15, 2017 Email from Brian Edgeworth to Daniel Simon regarding unpaid invoices (SIMONEH0000412)			
39	November 21, 2017 Email from Brian Edgeworth to Daniel Simon regarding "This is an updated sheet of costs" (SIMONEH0000413)			
40	November 27, 2017 Letter from Daniel Simon to Brian Edgeworth (SIMONEH0000414-0000418)			
41	November 27, 2017 Email from Angela Edgeworth to Daniel Simon regarding settlement (SIMONEH0000418a)			
42	November 27, 2017 Email from Angela Edgeworth to Daniel Simon regarding settlement and coming into office (SIMONEH0000419)			
43	November 29, 2017 Letter of Direction from Brian Edgeworth to Daniel Simon (SIMONEH0000420)			
44	November 29 2017 Email from Angela Edgeworth to Daniel Simon regarding settlement and coming into office (SIMONEH0000421)			
45	December 1, 2017 Email chain between Daniel Simon and Ruben Herrera regarding "Siena Simon" (SIMONEH0000422-0000423)			
46	December 7, 2017 Letter from Daniel Simon to Robert Vannah (SIMONEH0000424-0000425)			
47	December 7, 2017 Consent to Settle Lange from Brian Edgeworth (SIMONEH0000426-0000427)			
48	December 26, 2017 Email chain between Jim Christensen and Robert Vannah regarding client availability to sign Viking check (SIMONEH0000428-0000431)			

		For Admit Date		
49	December 27, 2017 Letter from Jim Christensen to Robert Vannah in response to 12/26/17 email (SIMONEH0000432-0000441)	Y	Stip	8-27-18
50	December 28, 2017 Email chain between Jim Christensen and Robert Vannah regarding separate bank account (SIMONEH0000442-0000447)			
51	January 4, 2017 Letter from Robert Vannah to Sara Guindy (SIMONEH0000448)			
52	January 4, 2018 Email from Sara Guindy regarding new trust account (SIMONEH0000449)			
53	January 9, 2018 Email chain between Robert Vannah and Jim Christensen regarding not terminating Daniel Simon (SIMONEH0000450-0000452)			
54	Check to Client for Viking Settlement in amount of \$3,950,561.27 (SIMONEH0000453)			
55	Check of Costs Paid by Edgeworth dated March 1, 2018 (SIMONEH0000454)			
56	Construction Agreement between American Grating and Lange Plumbing (SIMONEH0000455-0000480)			
57	Nonrecourse Promissory Note with Margaret Ho (SIMONEH0000481-0000483)			
58	Nonrecourse Promissory Note with Colin Kendrick (SIMONEH0000484-0000486)			
59	Subordinate Nonrecourse Promissory Note for \$400,000 with Margaret Ho (SIMONEH0000487-0000489)			
60	Video of 645 St. Croix, Henderson, NV from YouTube (SIMONEH0000490)			
61	Pictures of 645 St. Croix, Henderson, NV from Zillow (SIMONEH0000491-0000519)			
62	Crane Pomerantz Engagement Letter (SIMONEH0000520-0000523)			
63	Register of Actions as of December 11, 2017 (SIMONEH0000524-0000535)			
64	Plaintiff's Wiznet Filing Report from 4.27.17 to 11.30.17 (SIMONEH0000536-0000545)			
65	Deposition Time Summary (SIMONEH0000546)	✓	✓	✓

WA-

OFFER Admit date

1	66	Deposition Notices (SIMONEH0000547-0000910)	Y	Stip	8-27-18	us
2	67	Written Discovery to Viking and Viking's Responses (SIMONEH0000911-0001177)				us
3	68	Written Discovery to Lange and Lange's Responses (SIMONEH0001178-0001248)				us
4	69	Stipulations and Orders to Continue Other Cases (SIMONEH0001249-0001339)				us
5	70	Calculation of Damages (as of 9/28/17) (SIMONEH0001340-0001341)				us
6	71	Summary of Early Case Conference Disclosures & Supplements (SIMONEH0001342-0001343)				us
7	72	Christmas Card to the Simon Family from the Edgeworth Family (SIMONEH0001344-0001346)				us
8	73	Texts between Angela Edgeworth and Eleya Simon (SIMONEH0001347-0001352)				us
9	74	Case Expense Summary, dated January 2, 2018 (SIMONEH0001353-0001357)				us
10	75	Cost Basis of Spec Development (SIMONEH0001358)				us
11	76	American Grating Invoices (SIMONEH0001359-0001360)				us
12	77	Pictures of Edgeworth Dropbox File (SIMONEH0001361-0001371)				us
13	78	Invoice from Jerry Heskett (SIMONEH0001372)				us
14	79	Plaintiff's Early Case Conference Disclosures with Computation of Damages (SIMONEH0001373-0001654)				us
15	80	Emails regarding the Edgeworth case (combined) (SIMONEH0001655-0007197)				us
16	81	February 6, 2018 Hearing Transcript (SIMONEH0007198-0007243)				us
17	82	February 20, 2018 Hearing Transcript (SIMONEH0007244-0007266)				us
18	83	April 3, 2018 Hearing Transcript (SIMONEH0007267-0007297)				us
19	84	Deposition of Brian Edgeworth, dated September 29, 2017 (SIMONEH0007298-0007642)	↓	↓	↓	us

		off	obj	admit
85	Deposition of Margaret Ho, dated October 16, 2017 (SIMONEH0007643-0007678)	Y	Stip	8-27-18
86	Deposition of Angela Edgeworth, dated September 18, 2017 (SIMONEH0007679-0007855)			
87	Offer of Judgment to Lange Plumbing, LLC. (SIMONEH0007856-0007858)			
88	Email from Ashley Ferrel to Daniel Simon re Edgeworth 6 th Supplement, dated July 6, 2017(SIMONEH0007859)			
89	Email from Ashley Ferrel to Daniel Simon regarding Viking documents just produced (SIMONEH0007860)	↓	↓	↓
90	Retainer Agreement	8-27-18	N	8-27-18

91 Emails from Viking Re: VK457 8-30-18 N 8-30-18 ur

92- PHOTO OF BANKER BOXES Y N 9-18-18 ur

93- PHOTO OPEN BANKER BOXES Y N 9-18-18 ur

94- PHOTO COPY OF CHECK \$ 437,575.42 Y N 9-18-18 ur

95- PHOTO COPY OF CHECK \$ 726,407.98 Y N 9-18-18 ur



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

STEVE MORRIS
801 S. RANCHO DR., STE. B4
LAS VEGAS, NV 89106

DATE: July 20, 2021
CASE: A-18-767242-C
C/W A-16-738444-C

RE CASE: EDGEWORTH FAMILY TRUST; AMERICAN GRATING, LLC vs. DANIEL S. SIMON dba SIMON LAW

NOTICE OF APPEAL FILED: July 17, 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

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.

*****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; EDGEWORTH FAMILY TRUST AND AMERICAN GRATING LLC'S CASE APPEAL STATEMENT; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET; DECISION AND ORDER DENYING PLAINTIFFS' RENEWED MOTION FOR RECONSIDERATION OF THIRD AMENDED DECISION AND ORDER ON MOTION TO ADJUDICATE LIEN AND DENYING SIMON'S COUNTERMOTION TO ADJUDICATE LIEN ON REMAND (FROM LEAD CASE A-16-738444-C); NOTICE OF ENTRY OF DECISION AND ORDER DENYING PLAINTIFFS' RENEWED MOTION FOR RECONSIDERATION OF THIRD AMENDED DECISION AND ORDER ON MOTION TO ADJUDICATE LIEN AND DENYING SIMON'S COUNTERMOTION TO ADJUDICATE LIEN ON REMAND; DECISION AND ORDER DENYING EDGEWORTH'S MOTION FOR ORDER RELEASING CLIENT FUNDS AND REQUIRING PRODUCTION OF COMPLETE FILE; NOTICE OF ENTRY OF DECISION AND ORDER DENYING EDGEWORTH'S MOTION OF ORDER RELEASING CLIENT FUNDS AND REQUIRING PRODUCTION OF COMPLETE FILE; DISTRICT COURT MINUTES; EXHIBITS LIST; NOTICE OF DEFICIENCY

EDGEWORTH FAMILY TRUST; AMERICAN GRATING, LLC,

Plaintiff(s),

vs.

DANIEL S. SIMON dba SIMON LAW,

Defendant(s),

Case No: A-18-767242-C

Consolidated with A-16-738444-C

Dept No: X

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 20 day of July 2021.

Steven D. Grierson, Clerk of the Court



Heather Ungermann, Deputy Clerk

