

Margaret Reddy, Mohan Thalamarla,  
Max Global, INC.

Appellants,

vs.

MEDAPPEAL, LLC, an Illinois  
limited liability company

Respondent.

Supreme Court No. 83763

Electronically Filed  
Dec 21 2021 09:29 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

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**APPELLANT'S DOCKETING STATEMENT, CIVIL APPEALS**

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Attorneys for Appellants:

Margaret Reddy, Mohan Thalamarla and Max Global, INC.

## GENERAL INFORMATION

All appellants not in proper person must complete this docketing statement. NRAP 14(a). The purpose of the docketing statement is to assist the Supreme Court in screening jurisdiction, classifying cases for en banc, panel, or expedited treatment, compiling statistical information and identifying parties and their counsel.

## 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 attach requested documents, 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.

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 8 Department XIV County CLARK.  
Judge ADRIANA ESCOBAR District Ct. Docket No. A-19-792836-C.

**2. Attorney filing this docketing statement:**

Attorney ANDREW PASTWICK, ESQ. for ANDREW WASIELEWSKI, ESQ. Telephone (702) 490-8511.

Firm THE WASIELEWSKI LAW FIRM, LTD.

Address 8275 S. EASTERN AVENUE, SUITE 200-818, LAS VEGAS, NV 89101

Client MARGARET REDDY, MOHAN THALAMARLA, MAX GLOBAL, INC.

**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 respondent(s):**

Attorney ZACHARY BALL, ESQ. Telephone (702) 303-8600

Firm THE BALL LAW GROUP

Address 1935 Village Center Circle, #120, Las Vegas, NV 89134

Client(s) MEDAPPEAL, LLC (an Illinois limited liability company)

Attorney JAY FREEDMAN, ESQ. Telephone (702) 342-5425

Firm .....

Address 11700 W. CHARLESTON BLVD., SUITE 170-357, LAS VEGAS, NV 89135

Client(s) MEDAPPEAL, LLC (an Illinois limited liability company)

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

- ☐ Judgment after bench trial
- ☐ Judgment after jury verdict
- ☐ Summary judgment
- ☐ Default judgment
- ☐ Dismissal
  - ☐ Lack of jurisdiction
  - ☐ Failure to state a claim
  - ☐ Failure to prosecute
  - ☐ Other (Directed Verdict Motion)

- ☐ Grant/Denial of NRCP 60(h) relief
- ☐ Grant/Denial of injunction
- ☐ Grant/Denial of declaratory relief
- ☐ Review of agency determination
- ☐ Divorce decree:
  - ☐ Original
  - ☐ Modification
- ☒ Other disposition

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

N/A

- ☐ Child custody
- ☐ Termination of parental rights
- ☐ Venue
- ☐ Grant/denial of injunction or TKO
- ☐ Adoption
- ☐ Juvenile matters

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: APPEAL NUMBER 83253 IS PENDING BEFORE THIS COURT WITH SAME CAPTION

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:

NONE

8. **Nature of the action.** Briefly describe the nature of the action, including a list of the causes of action pleaded, and the result below:

RESPONDENT FILED ITS COMPLAINT AND THEN AMENDED ITS COMPLAINT AGAINST VARIOUS DEFENDANTS INCLUDING APPELLANTS FOR VARIOUS INTENTIONAL CAUSES OF ACTION.

THESE APPELLANTS MOVED TO DISMISS THE COMPLAINT AGAINST THEM, ALLEGING IN DECLARATIONS THAT RESPONDENT HAD NO JURISDICTION OVER THEM PERSONALLY AND INDIVIDUALLY. APPELLANTS ALLEGE THAT MOTION WAS IMPROPERLY DENIED.

LATER, A MOTION TO COMPEL WAS FILED AGAINST DEFENDANT MARGARET REDDY. THE ISSUE WAS BRIEFED AND THE DISCOVERY COMMISSIONER ENTERED A DCRR THAT ESSENTIALLY GRANTED THE MOTION. DEFENDANT MARGARET TIMELY OBJECTED AND THE OBJECTION WAS SET FOR HEARING. IT DOES NOT APPEAR THE OBJECTION WAS EVER HEARD, NOR WAS IT PROPERLY RULED UPON, THROUGH INFORMATION AND BELIEF AFTER REVIEWING THE REGISTRY OF ACTIONS IN THIS MATTER.

RESPONDENT FILED FOR SUMMARY JUDGMENT. THE COURT GRANTED SUMMARY JUDGMENT AND ENTERED JUDGMENT IN FAVOR OF RESPONDENT IN THE AMOUNT OF \$225,000.00.

PETITIONER PREVIOUSLY APPEALED THE DISTRICT COURT GRANTING SUMMARY JUDGMENT AGAINST THESE APPELLANTS. RESPONDENT FILED A MOTION FOR ATTORNEY'S FEES. THE COURT DID NOT INDEPENDENTLY RULE ON THE MOTION FOR ATTORNEY'S FEES, DIRECTING ALL PARTIES AT THE HEARING GRANTING THE MOTION FOR SUMMARY JUDGMENT WHEREIN THE ATTORNEY'S FEES AND COSTS WERE GRANTED. APPELLANTS WERE FOUND BY THE DISTRICT COURT TO BE JOINTLY AND SEVERALLY LIABLE FOR ATTORNEY'S FEES AND COSTS AS WELL. APPELLANTS MOVED FOR RELIEF FROM JUDGMENT CITING THAT RESPONDENT IS NOT LICENSED TO DO BUSINESS IN NEVADA AND IS A FOREIGN LLC. APPELLANTS' MOTION WAS DENIED IN A CHAMBERS RULING, DESPITE HAVING NOTICED A HEARING ON THE MOTION.

**Issues on appeal.** State concisely the principal issue(s) in this appeal:

APPELLANT ASSERTS THERE IS NO JOINT AND SEVERAL LIABILITY FOR ATTORNEY'S FEES AS THESE ENTITIES HAVE HAD NO CONTACT WITH RESPONDENT AND THE OTHER DEFENDANTS. THERE WAS NO FACTS SUPPORTING A CONCLUSION OF LAW APPELLANT IS A JOINT TORT FEASOR(S).

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

NONE KNOWN.

10. **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 .....

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

- ☐ Reversal of well-settled Nevada precedent to an attachment, 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: APPELLANT BRINGS BEFORE THIS SUPREME COURT AN ISSUE WHETHER CITIZENS OF MICHIGAN AND INDIA CAN BE JOINTLY AND SEVERALLY LIABLE IN NEVADA FOR ATTORNEY'S FEES BY A FOREIGN COMPANY, WITHOUT HAVING ANY CONTACT WITH RESPONDENT, WITH HAVING NO CONTACTS IN NEVADA AND WITHOUT RESPONDENT FILING TO DO BUSINESS IN NEVADA AND WITH RESPONDENT ADMITTING IT NEVER DID BUSINESS IN THE STATE OF NEVADA.

**13. Trial.** If this action proceeded to trial, how many days did the trial last? N/A

Was it a bench or jury trial? BENCH / SUMMARY JUDGMENT

**14. 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

**15. Date of entry of written judgment or order appealed from 10/6/2021 and 10/27/21. Attach a copy. If more than one judgment or order is appealed from, attach copies of each judgment or order from which an appeal is taken.**

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

**16. Date written notice of entry of judgment or order served 10/6/2021 and 10/27/21. Attach a copy, including proof of service, for each order or judgment appealed from.**

(a) Was service by ELECTRONIC delivery ☒ or by mail ☐ (specify).

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

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

NRCP 50(b) .....Date served ..... By delivery .....or by mail ..... Date of filing .....  
 NRCP 52(b) .....Date served ..... By delivery .....or by mail ..... Date of filing .....  
 NRCP 59 .....Date served ..... By delivery .....or by mail ..... Date of filing .....

**Attach copies of all post-trial tolling motions.**

**NOTE: Motions made pursuant to NRCP 60 or motions for rehearing or reconsideration do not toll the time for filing a notice of appeal.**

(b) Date of entry of written order resolving tolling motion ..... **Attach a copy.**

(c) Date written notice of entry of order resolving motion served ..... **Attach a copy, including proof of service.**

(i) Was service by delivery .....or by mail .....(specify).

**18. Date notice of appeal was filed November 5, 2021.**

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

**19. Specify statute or rule governing the time limit for filing the notice of appeal, e.g., NRAP 4(a), NRS 155.190, or other NRAP 4(a).**

## SUBSTANTIVE APPEALABILITY

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

NRAP 3A(b)(1) ☒ NRCP 12(b)(1), 12(b)(2), 56(a)(d)(e)(h), NRS 86.548

NRAP 3A(b)(2) .....

NRAP 3A(b)(3) .....

Other (specify) .....

Explain how each authority provides a basis for appeal from the judgment or order:

RULE USED ALLOWS AN APPEAL FROM THE FINAL ORDER.

COMPLETE THE FOLLOWING SECTION ONLY IF MORE THAN ONE CLAIM FOR RELIEF WAS PRESENTED IN THE ACTION (WHETHER AS A CLAIM, COUNTERCLAIM, CROSS-CLAIM, OR THIRD-PARTY CLAIM) OR IF MULTIPLE PARTIES WERE INVOLVED IN THE ACTION. Attach separate sheets as necessary.

**21. List all parties involved in the action in the district court:**

MEDAPPEAL LLC – PLAINTIFF, COUNTERDEFENDANT

VIJAY REDDY - DEFENDANT

MARGARET REDDY – DEFENDANT

MOHAN THALAMARLA – DEFENDANT

MAX GLOBAL INC – DEFENDANT

DAVID WEINSTEIN – DEFENDANT

MEDASSET INC – DEFENDANT, COUNTERCLAIMANT, THIRD PARTY PLAINTIFF

KEVIN BROWN – DEFENDANT

VISIONARY BUSINESS BROKERS – DEFENDANT

LIBERTY CONSULTING & MANAGEMENT SERVICES, THIRD PARTY DEFENDANT

(a) 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:

THE UNDERSIGNED ONLY REPRESENTS THE APPELLANTS.

**22. Give a brief description (3 to 5 words) of each party's separate claims, counterclaims, cross-claims or third-party claims, and the trial court's disposition of each claim, and how each claim was resolved (i.e., order, judgment, stipulation), and the date of disposition of each claim. Attach a copy of each disposition.**

MEDAPPEAL – FILED COMPLAINT AND AMENDED COMPLAINT, SUMMARY JUDGMENT ON AMENDED COMPLAINT

MEDASSET – FILED COUNTERCLAIM AND THIRD PARTY COMPLAINT  
AT HEARING, COURT ORDERED ALL CLAIMS DISPOSED OF.

**23. Attach copies of the last-filed version of all complaints, counterclaims, and/or cross-claims filed in the district court.**

**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 below:**

Yes ☒ No ☐

**25. If you answered "No" to the immediately previous question, complete the following:**

(a) Specify the claims remaining pending below:

(b) Specify the parties remaining below:

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

Yes ☒ No ☐ **If "Yes," attach a copy of the certification or order, including any notice of entry and proof of service.**

(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)):**

## **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.**

Margaret Reddy, Mohan Thalamarla, Max Global, Inc  
NAME OF APPELLANTS

DECEMBER 21, 2021

\_\_\_\_\_  
DATE

NEVADA, CLARK COUNTY

\_\_\_\_\_  
STATE AND COUNTY WHERE SIGNED

ANDREW WASIELEWSKI, ESQ.  
NAME OF COUNSEL OF RECORD

/S/ ANDREW PASTWICK, ESQ  
FOR

\_\_\_\_\_  
SIGNATURE OF COUNSEL OF RECORD

## **CERTIFICATE OF SERVICE**

I certify that on the 21<sup>st</sup> day of December, 2021 I served a copy of this completed docketing statement upon all counsel of record:

☐ By personally serving it upon him/her: or

☒ By electronically serving the document utilizing the e-service provisions of the Nevada Supreme Court E-Flex System to the following address(es):

ZACHARTY T. BALL, ESQ.  
THE BALL LAW GROUP  
Attorneys for Respondent

STEPHEN HABERFELD, settlement judge

Dated this 21<sup>st</sup> day of December, 2021

/s/ ANDREW PASTWICK, FOR ANDREW  
WASIELEWSKI

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Signature of Employee



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