

STORM LEGAL GROUP  
3037 E. Warm Springs Rd. Ste. 300  
Las Vegas, Nevada 89120-3759  
Tel. (702) 765-0976 \* Fax (702) 765-0981

1 **NOAS**  
2 **STORM LEGAL GROUP**  
3 ERICH N. STORM, ESQ.  
4 Nevada State Bar No.:4480  
5 [estorm@keyinsco.com](mailto:estorm@keyinsco.com)  
6 3037 East Warm Springs Road, Suite 300  
7 Las Vegas, Nevada 89120  
8 Telephone: (702) 765-0976  
9 Facsimile: (702) 765-0981  
10 *Attorneys for Defendant*

11 **DISTRICT COURT**  
12 **CLARK COUNTY, NEVADA**

13 EDEL RAMIREZ-NAVARRETE, an individual,  
14 Plaintiff,  
15  
16 vs.  
17  
18 HOLGA FLORES-REYES, an individual;  
19 ANTHONY VERDON, an individual; DOE  
20 DRIVERS I-V; DOE OWNERS I-V; ROE  
21 EMPLOYERS I-V; and ROE CORPORATIONS  
22 I-V, inclusive,  
23 Defendant.

CASE NO.: A-19-800500-C  
DEPT NO.: 27

**NOTICE OF APPEAL**

24 Notice is hereby given that ANTHONY VERDON AND HOLGA FLORES-REYES,  
25 defendants above-named, hereby appeal to the Supreme Court of Nevada from:

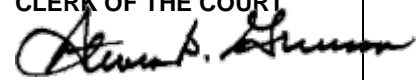
- 26 1. The Judgment on Arbitration Award entered in this action on December 28, 2020;
- 27 2. The District Court's Order granting Plaintiff's Motion to Strike Defendants'  
28 Request for Trial de Novo entered on December 10, 2020.

DATED this 4th day of February, 2021.

**STORM LEGAL GROUP**

By: /s/ Erich N. Storm  
ERICH N. STORM, ESQ.  
Nevada State Bar No.: 4480  
3037 East Warm Springs Road, Suite 300  
Las Vegas, Nevada 89120  
*Attorneys for Defendant*

Electronically Filed  
2/4/2021 12:59 PM  
Steven D. Grierson  
CLERK OF THE COURT



Electronically Filed  
Feb 09 2021 04:17 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

1 **CERTIFICATE OF SERVICE**

2 I **HEREBY CERTIFY** that on this 4th day of February, 2021, I served a true and  
3 complete copy of the foregoing NOTICE OF APPEAL addressed to the parties below as follows:

4 ☐ by placing a true and correct copy of the same to be deposited for mailing in the U.S. Mail,  
5 enclosed in a sealed envelope upon which first class postage was fully prepaid; and /or

6 ☐ via facsimile; and or

7 ☐ by hand delivery to parties listed below; and or

8 ☒ by electronic service via ODYSSEY eFileNV through the District Court.

9  
10 KIMBALL J. JONES, ESQ.

Nevada Bar No.: 12982

11 ROBERT N. EATON, ESQ.

Nevada Bar No.: 9547

12 BIGHORN LAW

2225 E. Flamingo Rd.

13 Building 2, Suite 300

14 Las Vegas, Nevada 89119

Phone: (702) 333-1111

15 Fax: (702) 507-0092

[kimball@bighornlaw.com](mailto:kimball@bighornlaw.com)

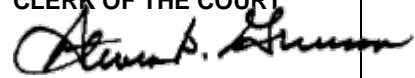
16 [roberte@bighornlaw.com](mailto:roberte@bighornlaw.com)

17 *Attorneys for Plaintiff*

18  
19 /s/ Jeri L. Roth

20 **STORM LEGAL GROUP**

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*Attorneys for Defendant*

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

EDEL RAMIREZ-NAVARRETE, an individual,  
  
Plaintiff,  
  
vs.  
  
HOLGA FLORES-REYES, an individual;  
ANTHONY VERDON, an individual; DOE  
DRIVERS I-V; DOE OWNERS I-V; ROE  
EMPLOYERS I-V; and ROE CORPORATIONS  
I-V, inclusive,  
  
Defendant.

CASE NO.: A-19-800500-C  
  
DEPT NO.: 27

**CASE APPEAL STATEMENT**

Defendants/Appellants, ANTHONY VERDON and HOLGA FLORES-REYES, through  
their undersigned counsel, hereby submit the following Case Appeal Statement:

**1. Name of appellant filing this case appeal statement:**

Anthony Verdon and Holga Flores-Reyes.

**2. Identify the judge issuing the decision, judgment, or order appealed from:**

The Honorable Nancy L. Allf.

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

Appellant: Anthony Verdon.

Counsel for Appellant: Erich N. Storm, Esq., 3037 East Warm Springs Road,  
Suite 300, Las Vegas, Nevada 89120.

1 Appellant: Holga Flores-Reyes.

2 Counsel for Appellants: Erich N. Storm, Esq., 3037 East Warm Springs Road,  
3 Suite 300, Las Vegas, Nevada 89120.

4 **4. Identify each respondent and the name and address of appellate counsel, if**  
5 **known, for each respondent (if the name of a respondent's appellate counsel is**  
6 **unknown, indicate as much and provide the name and address of that respondent's**  
7 **trial counsel):**

8 Respondent: Edel Ramirez-Navarrete.

9 Counsel for Respondent: Kimball Jones, Esq., and Robert N. Eaton, Esq., 2225 E.  
10 Flamingo Rd., Building 2, Suite 300, Las Vegas, Nevada 89119.

11 **5. Indicate whether any attorney identified above in response to question 3 or 4 is**  
12 **not licensed to practice law in Nevada and, if so, whether the district court granted**  
13 **that attorney permission to appear under SCR 42 (attach a copy of any district court**  
14 **order granting such permission):**

15 No attorney is not licensed to practice law in Nevada.

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

18 Appellants were represented by retained counsel in the District Court.

19 **7. Indicate whether appellant is represented by appointed or retained counsel on**  
20 **appeal:**

21 Appellants are represented by retained counsel on appeal.

22 **8. Indicate whether appellant was granted leave to proceed in forma pauperis, and**  
23 **the date of entry of the district court order granting such leave:**

24 Appellants have not been granted leave to proceed in forma pauperis.

25 **9. Indicate the date the proceedings commenced in the district court (e.g., date**  
26 **complaint, indictment, information, or petition was filed):**

27 August 19, 2019.

28 ///

1           **10. Provide a brief description of the nature of the action and result in the district**  
2           **court, including the type of judgment or order being appealed and the relief granted**  
3           **by the district court:**

4           This is a personal injury action between Plaintiff/Respondent and  
5           Defendants/Appellants. The parties submitted the matter to the court-annexed  
6           arbitration program in Clark County, Nevada, and an award was rendered in favor  
7           of Plaintiff/Respondent. Defendants/Appellants timely filed a Request for Trial de  
8           Novo. Subsequently, Plaintiff/Respondent filed a Motion to Strike Defendants’  
9           Request for Trial de Novo on the grounds that the Defendants did not participate in  
10          good faith. The District Court granted that motion by Order entered December 10,  
11          2020. A judgment was entered against Defendants/Appellants on December 28,  
12          2020; a notice of entry of “default judgement” was entered and served on January  
13          4, 2021; and an amended notice of entry of judgment was entered and served on  
14          January 5, 2021.

15          Defendant/Appellant is appealing the Judgment and the Court’s Order on the  
16          Motion to Strike.

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

20          The case has not previously been the subject of an appeal or original writ  
21          proceeding in the Supreme Court.

22           **12. Indicate whether this appeal involves child custody or visitation:**

23          The appeal does not involve child custody or visitation.

24          ///

25          ///

26          ///

27          ///

28          ///

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

This appeal involves the possibility of settlement.

DATED this 4th day of February, 2021.

**STORM LEGAL GROUP**

By: /s/ Erich N. Storm

ERICH N. STORM, ESQ.

Nevada State Bar No.: 4480

3037 East Warm Springs Road, Suite 300

Las Vegas, Nevada 89120

*Attorneys for Defendant*

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☐ by placing a true and correct copy of the same to be deposited for mailing in the U.S. Mail, enclosed in a sealed envelope upon which first class postage was fully prepaid; and /or

☐ via facsimile; and or

☐ by hand delivery to parties listed below; and or

☒ by electronic service via ODYSSEY eFileNV through the District Court.

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**STORM LEGAL GROUP**

**CASE SUMMARY****CASE NO. A-19-800500-C**

**Edel Ramirez-Navarrete, Plaintiff(s)**  
**vs.**  
**Holga Flores-Reyes, Defendant(s)**

§  
§  
§  
§  
§

Location: **Department 27**  
 Judicial Officer: **Allf, Nancy**  
 Filed on: **08/19/2019**  
 Cross-Reference Case Number: **A800500**

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

12/28/2020 Judgment on Arbitration  
 12/28/2020 Judgment on Arbitration

Case Type: **Negligence - Auto**

Case Status: **12/28/2020 Closed**


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

Case Number A-19-800500-C  
 Court Department 27  
 Date Assigned 08/19/2019  
 Judicial Officer Allf, Nancy

**PARTY INFORMATION**

		<i>Lead Attorneys</i>
<b>Plaintiff</b>	<b>Ramirez-Navarrete, Edel</b>	<b>Leavitt, Jacob G</b> <i>Retained</i> 702-333-1111(W)
<b>Defendant</b>	<b>Flores-Reyes, Holga</b>	<b>Purdy, Joseph J.</b> <i>Retained</i> 702-765-0976(W)
	<b>Verdon, Anthony</b>	<b>Purdy, Joseph J.</b> <i>Retained</i> 702-765-0976(W)
<b>Arbitrator</b>	<b>MacNabb, Lyn</b>	

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

08/19/2019	 <b>Complaint</b> Filed By: Plaintiff Ramirez-Navarrete, Edel <i>Complaint</i>
08/19/2019	 <b>Initial Appearance Fee Disclosure</b> Filed By: Plaintiff Ramirez-Navarrete, Edel <i>Initial Appearance Fee Disclosure</i>
08/19/2019	 <b>Summons Electronically Issued - Service Pending</b> Party: Plaintiff Ramirez-Navarrete, Edel <i>Summons</i>
08/19/2019	 <b>Summons Electronically Issued - Service Pending</b> Party: Plaintiff Ramirez-Navarrete, Edel <i>Summons</i>



# CASE SUMMARY

CASE NO. A-19-800500-C

09/10/2019	 Affidavit of Service Filed By: Plaintiff Ramirez-Navarrete, Edel <i>Affidavit of Service - Holga Flores-Reyes</i>
09/20/2019	 Affidavit of Service <i>Affidavit of Service - Anthony Verdon</i>
10/14/2019	 Three Day Notice of Intent to Default Filed By: Plaintiff Ramirez-Navarrete, Edel <i>Three (3) Day Notice of Intent to Take Default</i>
10/17/2019	 Initial Appearance Fee Disclosure Filed By: Defendant Flores-Reyes, Holga; Defendant Verdon, Anthony <i>Initial Appearance Fee Disclosure ( NRS Chapter 19)</i>
10/17/2019	 Demand for Jury Trial Filed By: Defendant Flores-Reyes, Holga; Defendant Verdon, Anthony <i>Demand for Trial by Jury</i>
10/17/2019	 Answer to Complaint Filed by: Defendant Flores-Reyes, Holga; Defendant Verdon, Anthony <i>Defendants' Answer to Plaintiff's Complaint</i>
12/02/2019	 Appointment of Arbitrator <i>Appointment of Arbitrator</i>
12/09/2019	 Notice of Early Arbitration Conference Filed By: Arbitrator MacNabb, Lyn <i>Notice of Early Arbitration Conference</i>
12/17/2019	 Notice to Appear for Arbitration Hearing Filed by: Arbitrator MacNabb, Lyn <i>Notice to Appear</i>
12/17/2019	 Arbitration Discovery Order Filed By: Arbitrator MacNabb, Lyn <i>Discovery Order</i>
03/10/2020	 Notice to Appear for Arbitration Hearing Filed by: Arbitrator MacNabb, Lyn <i>Notice to Appear</i>
05/27/2020	 Notice of Change of Address Filed By: Plaintiff Ramirez-Navarrete, Edel <i>Notice Of Change Of Firm Address</i>
06/08/2020	 Notice to Appear for Arbitration Hearing Filed by: Arbitrator MacNabb, Lyn <i>Notice to Appear</i>
09/02/2020	 Request for Extension of Time and Order - Arbitrator <i>Request for Extension of Time and Order</i>







# CASE SUMMARY

CASE NO. A-19-800500-C

09/15/2020	 Arbitration Award <i>Arbitration Award</i>
09/15/2020	 Arbitrators Bill for Fees and Costs Filed By: Arbitrator MacNabb, Lyn <i>Arbitrator's Bill</i>
09/21/2020	 Application for Attorney's Fees, Costs and/or Interest <i>PLAINTIFF S APPLICATION FOR FEES AND COSTS</i>
09/21/2020	 Memorandum of Costs and Disbursements <i>PLAINTIFF S VERIFIED MEMORANDUM OF COSTS AND DISBURSEMENTS</i>
10/02/2020	 Arbitrator's Decision on Request for Fees/Costs/Interest Filed by: Arbitrator MacNabb, Lyn <i>Decision on Request for Fees, Costs Interest</i>
10/08/2020	 Demand for Removal from the Short Trial Program Filed By: Defendant Flores-Reyes, Holga <i>Demand for Removal from Short Trial Program</i>
10/21/2020	 Motion to Strike Filed By: Plaintiff Ramirez-Navarrete, Edel <i>Plaintiffs Motion to Strike Defendant Request for Trial de Novo</i>
10/21/2020	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
11/04/2020	 Opposition to Motion Filed By: Defendant Flores-Reyes, Holga; Defendant Verdon, Anthony <i>Defendant's Opposition to Plaintiff's Motion to Strike Request for Trial De Novo</i>
11/24/2020	 Reply in Support Filed By: Plaintiff Ramirez-Navarrete, Edel <i>Reply in Support of Plaintiff's Motion to Strike Defendants' Request for Trial de Novo</i>
12/03/2020	 Clerk's Notice of Nonconforming Document <i>Clerk's Notice of Nonconforming Document</i>
12/10/2020	 Order Granting Motion Filed By: Plaintiff Ramirez-Navarrete, Edel <i>Order Order Granting Ramirez Naverette's Motion to Strike Request for Trial De Novo</i>
12/15/2020	 Notice To Prevailing Party Final Judgment May Be Entered <i>Notice to Prevailing Party to Enter Judgment on Arbitration Award</i>
12/28/2020	 Order to Statistically Close Case <i>Civil Order to Statistically Close Case</i>
12/28/2020	 Judgment on Arbitration Award Filed By: Plaintiff Ramirez-Navarrete, Edel <i>Judgment on Arbitration Award</i>

# CASE SUMMARY

CASE NO. A-19-800500-C

01/04/2021	 Notice of Entry of Judgment Filed By: Plaintiff Ramirez-Navarrete, Edel <i>Notice of Entry of Default Judgment</i>
01/05/2021	 Notice of Entry of Judgment Filed By: Plaintiff Ramirez-Navarrete, Edel <i>Amended Notice of Entry of Judgment</i>
02/04/2021	 Notice of Appeal Filed By: Defendant Flores-Reyes, Holga; Defendant Verdon, Anthony <i>NOTICE OF APPEAL</i>
02/04/2021	 Case Appeal Statement Filed By: Defendant Flores-Reyes, Holga; Defendant Verdon, Anthony <i>CASE APPEAL STATEMENT</i>
<b><u>DISPOSITIONS</u></b>	
12/28/2020	<b>Judgment Upon Arbitration Award</b> (Judicial Officer: Allf, Nancy) Debtors: Holga Flores-Reyes (Defendant), Anthony Verdon (Defendant) Creditors: Edel Ramirez-Navarrete (Plaintiff) Judgment: 12/28/2020, Docketed: 12/29/2020 Total Judgment: 16,500.54
<b><u>HEARINGS</u></b>	
09/10/2020	<b>Arbitration Hearing</b> (7:00 AM)
09/23/2020	 <b>Minute Order</b> (3:00 AM) (Judicial Officer: Allf, Nancy) <i>Minute Order: Application for Attorney s Fees, Costs, and/or Interest SET 10/6/2020 Chambers Calendar</i>
<b>MINUTES</b> Minute Order - No Hearing Held; Minute Order: Application for Attorney s Fees, Costs, and/or Interest SET 10/6/2020 Chambers Calendar Journal Entry Details: <i>COURT FINDS after review that an Arbitration Hearing took place on September 10, 2020. COURT FURTHER FINDS after review that an Arbitration Award was filed on September 15, 2020. COURT FURTHER FINDS after review that an Arbitrator s Bill for Fees and Costs was filed on September 15, 2020. COURT FURTHER FINDS after review that Plaintiffs filed an Application for Attorney s Fees, Costs, and/or Interest as well as a Memorandum of Costs and Disbursements on September 21, 2020. No hearing was requested. THEREFORE, COURT ORDERS for good cause appearing and after review the Motion for Fees is hereby scheduled on October 6, 2020 on Chambers calendar. CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Nicole McDevitt, to all registered parties for Odyssey File &amp; Serve. /nm 9/23/2020.;</i>	
<b>SCHEDULED HEARINGS</b> <b>CANCELED Motion for Fees</b> (10/06/2020 at 3:00 AM) (Judicial Officer: Allf, Nancy) <i>Vacated - On in Error Application for Attorney s Fees, Costs, and/or Interest</i>	
10/06/2020	<b>CANCELED Motion for Fees</b> (3:00 AM) (Judicial Officer: Allf, Nancy) <i>Vacated - On in Error Application for Attorney s Fees, Costs, and/or Interest</i>
12/01/2020	 <b>Minute Order</b> (3:00 AM) (Judicial Officer: Allf, Nancy) <i>Minute Order: BlueJeans Appearance</i> Minute Order - No Hearing Held; Minute Order: BlueJeans Appearance Journal Entry Details: <i>Department 27 Formal Request to Appear Telephonically Re: Matter set on December 3, 2020</i>

EIGHTH JUDICIAL DISTRICT COURT

**CASE SUMMARY**

**CASE NO. A-19-800500-C**

at 9:30 a.m. Please be advised that due to the COVID-19 pandemic, Department 27 will continue to conduct Court hearings REMOTELY using the Blue Jeans Video Conferencing system. You have the choice to appear either by phone or computer/video. Dial the following number: 1-408-419-1715 Meeting ID: 897 138 369 Meeting URL: <https://bluejeans.com/897138369> To connect by phone dial the number provided and enter the meeting ID followed by # To connect by computer if you do NOT have the app, copy the URL link into a web browser. Google Chrome is preferred but not required. Once you are on the BlueJeans website click on Join with Browser which is located on the bottom of the page. Follow the instructions and prompts given by BlueJeans. You may also download the Blue Jeans app and join the meeting by entering the meeting ID PLEASE NOTE the following protocol each participant will be required to follow: Place your phone on MUTE while waiting for your matter to be called. Do NOT place the call on hold since some phones may play wait/hold music. Please do NOT use speaker phone as it causes a loud echo/ringing noise. Please state your name each time you speak so that the court recorder can capture a clear record. Please be mindful of rustling papers, background noise, and coughing or loud breathing. Please be mindful of where your camera is pointing. We encourage you to visit the Bluejeans.com website to get familiar with the Blue Jeans phone/videoconferencing system before your hearing. If your hearing gets continued to a different date after you have already received this minute order please note a new minute order will issue with a different meeting ID since the ID number changes with each meeting/hearing. Please be patient if you call in and we are in the middle of oral argument from a previous case. Your case should be called shortly. Again, please keep your phone or computer mic on MUTE until your case is called. CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Nicole McDevitt, to all registered parties for Odyssey File & Serve. /nm 12/1/2020 ;

12/03/2020



**Motion to Strike (9:30 AM)** (Judicial Officer: Allf, Nancy)

*Plaintiffs Motion to Strike Defendant Request for Trial de Novo*

Granted;

Journal Entry Details:

*All appearances made via the BlueJeans Videoconferencing software. Arguments by counsel regarding the merits of and opposition to the motion. Court stated its findings and ORDERED, Plaintiff's Motion to Strike Defendant Request for Trial de Novo GRANTED. Mr. Eaton to prepare the order and submit it to Ms. Johnson for approval.;*

03/02/2021

**Status Check: Settlement Documents (3:00 AM)** (Judicial Officer: Allf, Nancy)

DATE

FINANCIAL INFORMATION

**Defendant** Verdon, Anthony

Total Charges

284.00

Total Payments and Credits

284.00

**Balance Due as of 2/8/2021**

**0.00**

**Plaintiff** Ramirez-Navarrete, Edel

Total Charges

270.00

Total Payments and Credits

270.00

**Balance Due as of 2/8/2021**

**0.00**

**Defendant** Verdon, Anthony

Short Trial - Removal Balance as of 2/8/2021

**1,000.00**

# DISTRICT COURT CIVIL COVER SHEET

County, Nevada

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

(Assigned by Clerk's Office)

**CASE NO. A-19-800500-C**  
**Department 27**

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

Plaintiff(s) (name/address/phone):	Defendant(s) (name/address/phone):
EDEL RAMIREZ-NAVARRETE	HOLGA FLORES-REYES
	ANTHONY VERDON
Attorney (name/address/phone):	Attorney (name/address/phone):
Jacob G. Leavitt, Esq.	
Bighorn Law, 716 S. Jones Blvd., Las Vegas, NV 89107	
Phone: 702-333-1111	

## II. Nature of Controversy *(please select the one most applicable filing type below)*

### Civil Case Filing Types

<p style="text-align: center;"><b>Real Property</b></p> <p><b>Landlord/Tenant</b></p> <p><input type="checkbox"/> Unlawful Detainer</p> <p><input type="checkbox"/> Other Landlord/Tenant</p> <p><b>Title to Property</b></p> <p><input type="checkbox"/> Judicial Foreclosure</p> <p><input type="checkbox"/> Other Title to Property</p> <p><b>Other Real Property</b></p> <p><input type="checkbox"/> Condemnation/Eminent Domain</p> <p><input type="checkbox"/> Other Real Property</p>	<p style="text-align: center;"><b>Negligence</b></p> <p><input checked="" type="checkbox"/> Auto</p> <p><input type="checkbox"/> Premises Liability</p> <p><input type="checkbox"/> Other Negligence</p> <p><b>Malpractice</b></p> <p><input type="checkbox"/> Medical/Dental</p> <p><input type="checkbox"/> Legal</p> <p><input type="checkbox"/> Accounting</p> <p><input type="checkbox"/> Other Malpractice</p>	<p style="text-align: center;"><b>Torts</b></p> <p><b>Other Torts</b></p> <p><input type="checkbox"/> Product Liability</p> <p><input type="checkbox"/> Intentional Misconduct</p> <p><input type="checkbox"/> Employment Tort</p> <p><input type="checkbox"/> Insurance Tort</p> <p><input type="checkbox"/> Other Tort</p>
<p style="text-align: center;"><b>Probate</b></p> <p><b>Probate</b> <i>(select case type and estate value)</i></p> <p><input type="checkbox"/> Summary Administration</p> <p><input type="checkbox"/> General Administration</p> <p><input type="checkbox"/> Special Administration</p> <p><input type="checkbox"/> Set Aside <input type="checkbox"/> Surviving Spouse</p> <p><input type="checkbox"/> Trust/Conservatorship</p> <p><input type="checkbox"/> Other Probate</p> <p><b>Estate Value</b></p> <p><input type="checkbox"/> Greater than \$300,000</p> <p><input type="checkbox"/> \$200,000-\$300,000</p> <p><input type="checkbox"/> \$100,001-\$199,999</p> <p><input type="checkbox"/> \$25,001-\$100,000</p> <p><input type="checkbox"/> \$20,001-\$25,000</p> <p><input type="checkbox"/> \$2,501-20,000</p> <p><input type="checkbox"/> \$2,500 or less</p>	<p style="text-align: center;"><b>Construction Defect &amp; Contract</b></p> <p><b>Construction Defect</b></p> <p><input type="checkbox"/> Chapter 40</p> <p><input type="checkbox"/> Other Construction Defect</p> <p><b>Contract Case</b></p> <p><input type="checkbox"/> Uniform Commercial Code</p> <p><input type="checkbox"/> Building and Construction</p> <p><input type="checkbox"/> Insurance Carrier</p> <p><input type="checkbox"/> Commercial Instrument</p> <p><input type="checkbox"/> Collection of Accounts</p> <p><input type="checkbox"/> Employment Contract</p> <p><input type="checkbox"/> Other Contract</p>	<p style="text-align: center;"><b>Judicial Review/Appeal</b></p> <p><b>Judicial Review</b></p> <p><input type="checkbox"/> Foreclosure Mediation Case</p> <p><input type="checkbox"/> Petition to Seal Records</p> <p><input type="checkbox"/> Mental Competency</p> <p><b>Nevada State Agency Appeal</b></p> <p><input type="checkbox"/> Department of Motor Vehicle</p> <p><input type="checkbox"/> Worker's Compensation</p> <p><input type="checkbox"/> Other Nevada State Agency</p> <p><b>Appeal Other</b></p> <p><input type="checkbox"/> Appeal from Lower Court</p> <p><input type="checkbox"/> Other Judicial Review/Appeal</p>
<p style="text-align: center;"><b>Civil Writ</b></p> <p><b>Civil Writ</b></p> <p><input type="checkbox"/> Writ of Habeas Corpus</p> <p><input type="checkbox"/> Writ of Mandamus</p> <p><input type="checkbox"/> Writ of Quo Warrant</p> <p><input type="checkbox"/> Writ of Prohibition</p> <p><input type="checkbox"/> Other Civil Writ</p>		<p style="text-align: center;"><b>Other Civil Filing</b></p> <p><b>Other Civil Filing</b></p> <p><input type="checkbox"/> Compromise of Minor's Claim</p> <p><input type="checkbox"/> Foreign Judgment</p> <p><input type="checkbox"/> Other Civil Matters</p>

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

**8/19/2019**

Date

**/s/Jacob Leavitt**

Signature of initiating party or representative

*See other side for family-related case filings.*

*Heather S. Smith*  
CLERK OF THE COURT

**JUDG**

**KIMBALL JONES, ESQ.**

Nevada Bar No.: 12982

**ROBERT N. EATON, ESQ.**

Nevada Bar No.: 9547

**BIGHORN LAW**

2225 E. Flamingo Rd.

Building 2, Suite 300

Las Vegas, Nevada 89119

Phone: (702) 333-1111

Email: [Roberte@bighornlaw.com](mailto:Roberte@bighornlaw.com)

*Attorneys for Plaintiff*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

EDEL RAMIREZ-NAVARETTE, and individual,

Plaintiff,

vs.

HOLGA FLORES-REYES, an individual;  
ANTHONY VERDON, an individual; DOE  
DRIVER I-V; DOE OWNERS I-V; ROE  
EMPLOYER I-V; ROE CORPORATIONS I-V,  
inclusive,

Defendants.

CASE NO.: A-19-800500-C

DEPT. NO.: XXVII

**JUDGMENT ON ARBITRATION AWARD**

This action came on for Arbitration hearing on September 10, 2020, before Arbitrator Lyn MacNabb, Esq., presiding, and the issues having been duly heard, a decision having been rendered and the prevailing party having been notified that judgment may be entered in accordance with the award, and Defendants Request for Trial de Novo having been denied, the Court hereby enters Judgment on the Arbitration Award and Ruling on Application for Fees, Costs and Interest, as follows:

///

///

**IT IS HEREBY ORDERED AND ADJUDGED** that Plaintiff, EDEL RAMIREZ-NAVARETTE, recover from the Defendants, HOLGA FLORES-REYES and ANTHONY VERDON, jointly and severally, the sum of \$16,600.54, together with interest accruing at the legal rate until fully paid.

DATED this 28 day of December, 2020.

Dated this 28th day of December, 2020

Nancy L Alf  
DISTRICT JUDGE

Respectfully submitted by:

**BIGHORN LAW**

/s/ Robert N. Eaton, Esq.  
**ROBERT N. EATON, ESQ.**  
Nevada Bar No.: 9547  
2225 E. Flamingo Rd.  
Building 2, Suite 300  
Las Vegas, Nevada 89119  
*Attorneys for Plaintiff*

EDB 914 6B31 0E2F  
Nancy Alf  
District Court Judge

NB



ARBA

Lyn MacNabb

Nevada Bar No. 4323

7432 W. Sahara Avenue, Ste. 101

Las Vegas, Nevada 89117

(702) 636-0111

Arbitrator

DISTRICT COURT

CLARK COUNTY, NEVADA

EDEL RAMIREZ-NAVARETTE,  
an individual,

Plaintiff,

v.

HOLGA FLORES-REYES, an individual,  
ANTHONY VERDON an  
individual, DOES DRIVERS I-V, DOE  
OWNERT I-V; ROE EMPLOYERS I-V;  
and ROE CORPORATIONS I-V, inclusive,

Defendants.

Case No: A-19-800500-C

Dept No: XXVII

ARBITRATION AWARD

TO: ROBERT EATON, Esq., attorney for Plaintiff; and

TO: PATRICE JOHNSON, Esq., attorney for Defendants.

The Arbitration hearing was held held on September 10, 2020. Present at the hearing were the above identified attorneys and the parties in this action. Having considered the testimony at the hearing, the briefs, pleadings and papers on file herein, I find in favor of the Plaintiff and against the Defendants Holga Flores-Reyes and Anthony Verdon and award total past damages in the amount of thirteen thousand five hundred dollars (\$13,500.00).

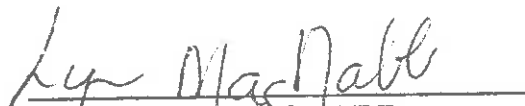


NOTICE

Pursuant to Nevada Arbitration Rule 18A, you are hereby notified that you have thirty days from the date you are served with the Award within which to file a request for trial de novo with the Clerk of the Court and to serve the Commissioner and the other parties.

Dated this 15th day of September, 2020.

LAW OFFICES OF LYN MACNABB

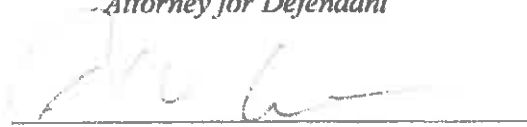
  
LYN MACNABB, ESQUIRE  
Nevada Bar Number 4323  
7432 Sahara Avenue, Ste. 101  
Las Vegas, Nevada 89117  
*Arbitrator*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of June, 2020, I electronically served a true and correct copy of the foregoing **ARBITRATION AWARD** to the attorneys addressed to the following:

JACOB LEAVITT, ESQ.  
716 S. Jones Blvd.  
Las Vegas, NV 89107  
*Attorney for Plaintiff*

PATRICE JOHNSON, ESQ.  
3057 E. Warm Springs Road #400  
Las Vegas, NV 89120  
*Attorney for Defendant*

  
An employee of Lyn MacNabb



1 **ABFCI**

2 Lyn MacNabb

3 Nevada Bar No. 4323

4 7432 W. Sahara Avenue, Ste. 101

5 Las Vegas, Nevada 89117

6 (702) 636-0111

7 Arbitrator

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 EDEL RAMIREZ-NAVARETTE,  
11 an individual,

12 Plaintiff,

13 v.

14 HOLGA FLORES-REYES, an individual,  
15 ANTHONY VERDON an  
16 individual, DOES DRIVERS I-V, DOE  
17 OWNERT I-V; ROE EMPLOYERS I-V;  
18 and ROE CORPORATIONS I-V, inclusive,

19 Defendants.

Case No: A-19-800500-C

Dept No: XXVII

**RULING ON APPLICATION  
FOR FEES, COSTS AND INTEREST**

20 TO: ROBERT EATON, Esq., attorney for Plaintiff; and

21 TO: PATRICE JOHNSON, Esq., attorney for Defendants.

22 Plaintiff prevailed at the arbitration and timely applied for fees, costs and interest.

23 Having considered the application, and having received no opposition thereto, Plaintiff is

24 awarded costs in the reduced amount of one thousand one hundred forty-one dollars and

25 thirty-five cents (\$1,141.35) and interest in the amount of nine hundred fifty-six and

26 nineteen cents (\$959.19). Regarding the application for attorney's fees, the undersigned

27 finds that the analysis under Brunzell v. Golden Gate Nat. Bank, 85 Nev. 345, 455 P.2d 31


28 (1969) was satisfied. The factors addressed by that case, prerequisite to an award of

1 attorney's fees, were set forth in the moving points and authorities with specificity.

2 Attorney's fees are thus awarded in the amount of one thousand dollars (\$1,000.00).

3 Dated this 2nd day of October, 2020.

4 LAW OFFICES OF LYN MACNABB

5  
6   
7 LYN MACNABB, ESQUIRE  
8 Nevada Bar Number 4323  
9 7432 Sahara Avenue, Ste. 101  
10 Las Vegas, Nevada 89117  
11 *Arbitrator*

12 **CERTIFICATE OF SERVICE**

13 I HEREBY CERTIFY that on the 2nd day of October, 2020, I electronically served  
14 a true and correct copy of the foregoing ***AWARD OF COSTS, INTEREST AND***

15 ***ATTORNEY'S FEES*** to the attorneys addressed to the following:

16 ROBERT EATON, ESQ.  
17 716 S. Jones Blvd.  
18 Las Vegas, NV 89107  
19 *Attorney for Plaintiff*

PATRICE JOHNSON, ESQ.  
3057 E. Warm Springs Road #400  
Las Vegas, NV 89120  
*Attorney for Defendant*

20   
21 An employee of Lyn MacNabb  
22  
23  
24  
25  
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28

1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Edel Ramirez-Navarrete,  
7 Plaintiff(s)

CASE NO: A-19-800500-C

8 vs.

DEPT. NO. Department 27

9 Holga Flores-Reyes,  
10 Defendant(s)

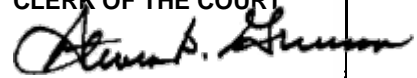
11 **AUTOMATED CERTIFICATE OF SERVICE**

12  
13 This automated certificate of service was generated by the Eighth Judicial District  
14 Court. The foregoing Judgment 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: 12/28/2020

16 Katie Ader	katie@bighornlaw.com
17 Jacqueline R. Esq.	jacqueline@bighornlaw.com
18 Lyn MacNabb	lynmacnabb@yahoo.com
19 Robert Eaton	roberte@bighornlaw.com
20 Patrice Johnson	PJohnson@keyinsco.com
21 Ashley Gittings	agittings@keyinsco.com
22 Steven Haile	stevenh@bighornlaw.com

23  
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NOE  
KIMBALL J. JONES, ESQ.  
Nevada Bar No. 12982  
ROBERT N. EATON, ESQ.  
Nevada bar No. 9547  
BIGHORN LAW  
716 S. Jones Blvd.  
Las Vegas, Nevada 89106  
Phone: (702) 333-1111  
Fax: (702) 507-0092  
[roberte@bighornlaw.com](mailto:roberte@bighornlaw.com)

*Attorneys for Plaintiff*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

EDEL RAMIREZ-NAVARRETE, an individual,  
  
Plaintiff,  
  
v.

CASE NO.: A-19-800500-C

DEPT. NO.: XXVII

HOLGA FLORES-REYES, an individual;  
ANTHONY VERDON, an individual; DOE  
DRIVERS I-V; DOE OWNERS I-V; ROE  
EMPLOYERS I-V; and ROE CORPORATIONS  
I-V, inclusive,  
  
Defendants.

**NOTICE OF ENTRY OF DEFAULT JUDGMENT**

TO: ALL DEFENDANTS AND THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that a Default Judgment was entered in the above-entitled matter on  
December 28, 2020, a true and correct copy of which is attached hereto.

DATED this 4<sup>th</sup> day of January, 2021.

**BIGHORN LAW**

By: /s/ Robert N. Eaton  
**ROBERT N. EATON, ESQ.**  
Nevada Bar No. 9547  
*Attorneys for Plaintiff*

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5, NEFCR 9 and EDCR 8.05, I hereby certify that I am an employee of  
3 **BIGHORN LAW** and on the 4th day of January, 2021, I served the foregoing ***NOTICE OF ENTRY OF***  
4 ***DEFAULT JUDGMENT*** as follows:

- 5 ☒ Electronic Service – By serving a copy thereof through the Court’s electronic service  
6 system; and/or  
7 ☐ U.S. Mail—By depositing a true copy thereof in the U.S. mail, first class postage prepaid  
8 and addressed as listed below; and/or  
9 ☐ Facsimile—By facsimile transmission pursuant to EDCR 7.26 to the facsimile  
10 number(s) shown below and in the confirmation sheet filed herewith. Consent to service  
under NRCP 5(b)(2)(D) shall be assumed unless an objection to service by facsimile  
transmission is made in writing and sent to the sender via facsimile within 24 hours of  
receipt of this Certificate of Service.

11 Joseph Purdy, Esq.  
12 PURDY ANDERSON STORM  
13 3057 East Warm Springs Road, Suite 400  
14 Las Vegas, Nevada 89120  
Attorneys for Defendants

15 /s/ Steven C. Haile  
16 An employee of **BIGHORN LAW**  
17  
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20  
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27  
28

*Heaven & Sun*  
CLERK OF THE COURT

**JUDG**  
**KIMBALL JONES, ESQ.**  
Nevada Bar No.: 12982  
**ROBERT N. EATON, ESQ.**  
Nevada Bar No.: 9547  
**BIGHORN LAW**  
2225 E. Flamingo Rd.  
Building 2, Suite 300  
Las Vegas, Nevada 89119  
Phone: (702) 333-1111  
Email: [Roberte@bighornlaw.com](mailto:Roberte@bighornlaw.com)  
*Attorneys for Plaintiff*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

EDEL RAMIREZ-NAVARETTE, and individual,  
  
Plaintiff,

CASE NO.: A-19-800500-C  
DEPT. NO.: XXVII

vs.

HOLGA FLORES-REYES, an individual;  
ANTHONY VERDON, an individual; DOE  
DRIVER I-V; DOE OWNERS I-V; ROE  
EMPLOYER I-V; ROE CORPORATIONS I-V,  
inclusive,

Defendants.

**JUDGMENT ON ARBITRATION AWARD**

This action came on for Arbitration hearing on September 10, 2020, before Arbitrator Lyn MacNabb, Esq., presiding, and the issues having been duly heard, a decision having been rendered and the prevailing party having been notified that judgment may be entered in accordance with the award, and Defendants Request for Trial de Novo having been denied, the Court hereby enters Judgment on the Arbitration Award and Ruling on Application for Fees, Costs and Interest, as follows:

///

///

IT IS HEREBY ORDERED AND ADJUDGED that Plaintiff, EDEL RAMIREZ-NAVARETTE, recover from the Defendants, HOLGA FLORES-REYES and ANTHONY VERDON, jointly and severally, the sum of \$16,600.54, together with interest accruing at the legal rate until fully paid.

DATED this 28 day of December, 2020.

Dated this 28th day of December, 2020

Nancy L Alf  
DISTRICT JUDGE

Respectfully submitted by:

**BIGHORN LAW**

/s/ Robert N. Eaton, Esq.  
**ROBERT N. EATON, ESQ.**  
Nevada Bar No.: 9547  
2225 E. Flamingo Rd.  
Building 2, Suite 300  
Las Vegas, Nevada 89119  
*Attorneys for Plaintiff*

EDB 914 6B31 0E2F  
Nancy Alf  
District Court Judge

NB



*Steven D. Grierson*

1 **ARBA**

2 Lyn MacNabb

3 Nevada Bar No. 4323

4 7432 W. Sahara Avenue, Ste. 101

5 Las Vegas, Nevada 89117

6 (702) 636-0111

7 Arbitrator

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 **EDEL RAMIREZ-NAVARETTE,** )

11 an individual, )

12 Plaintiff, )

Case No: A-19-800500-C

Dept No: XXVII

13 v. )

14 **HOLGA FLORES-REYES, an individual,** )

**ARBITRATION AWARD**

15 **ANTHONY VERDON an** )

16 individual, DOES DRIVERS I-V, DOE )

17 OWNERT I-V; ROE EMPLOYERS I-V; )

18 and ROE CORPORATIONS I-V, inclusive, )

19 Defendants. )

20 **TO: ROBERT EATON, Esq., attorney for Plaintiff; and**

21 **TO: PATRICE JOHNSON, Esq., attorney for Defendants.**


22 The Arbitration hearing was held held on September 10, 2020. Present at the  
23 hearing were the above identified attorneys and the parties in this action. Having  
24 considered the testimony at the hearing, the briefs, pleadings and papers on file herein, I  
25 find in favor of the Plaintiff and against the Defendants Holga Flores-Reyes and Anthony  
26 Verdon and award total past damages in the amount of thirteen thousand five hundred  
27 dollars (\$13,500.00).

NOTICE

Pursuant to Nevada Arbitration Rule 18A, you are hereby notified that you have thirty days from the date you are served with the Award within which to file a request for trial de novo with the Clerk of the Court and to serve the Commissioner and the other parties.

Dated this 15th day of September, 2020.

LAW OFFICES OF LYN MACNABB

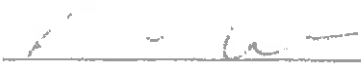
  
LYN MACNABB, ESQUIRE  
Nevada Bar Number 4323  
7432 Sahara Avenue, Ste. 101  
Las Vegas, Nevada 89117  
*Arbitrator*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of June, 2020, I electronically served a true and correct copy of the foregoing **ARBITRATION AWARD** to the attorneys addressed to the following:

JACOB LEAVITT, ESQ.  
716 S. Jones Blvd.  
Las Vegas, NV 89107  
*Attorney for Plaintiff*

PATRICE JOHNSON, ESQ.  
3057 E. Warm Springs Road #400  
Las Vegas, NV 89120  
*Attorney for Defendant*

  
An employee of Lyn MacNabb

*Steven D. Grierson*

1 ABFCI

Lyn MacNabb

2 Nevada Bar No. 4323

7432 W. Sahara Avenue, Ste. 101

3 Las Vegas, Nevada 89117

4 (702) 636-0111

Arbitrator

5  
6 DISTRICT COURT

7  
8 CLARK COUNTY, NEVADA

9 EDEL RAMIREZ-NAVARETTE,  
an individual,

10 Plaintiff,

11 v.

12  
13 HOLGA FLORES-REYES, an individual,  
14 ANTHONY VERDON an  
individual, DOES DRIVERS I-V, DOE  
15 OWNERT I-V; ROE EMPLOYERS I-V;  
and ROE CORPORATIONS I-V, inclusive,

16 Defendants.  
17

Case No: A-19-800500-C

Dept No: XXVII

RULING ON APPLICATION  
FOR FEES, COSTS AND INTEREST

18 TO: ROBERT EATON, Esq., attorney for Plaintiff; and

19 TO: PATRICE JOHNSON, Esq., attorney for Defendants.

20 Plaintiff prevailed at the arbitration and timely applied for fees, costs and interest.

21 Having considered the application, and having received no opposition thereto, Plaintiff is

22 awarded costs in the reduced amount of one thousand one hundred forty-one dollars and

23 thirty-five cents (\$1,141.35) and interest in the amount of nine hundred fifty-six and

24 nineteen cents (\$959.19). Regarding the application for attorney's fees, the undersigned

25 finds that the analysis under Brunzell v. Golden Gate Nat. Bank, 85 Nev. 345, 455 P.2d 31

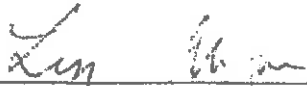
26 (1969) was satisfied. The factors addressed by that case, prerequisite to an award of

1 attorney's fees, were set forth in the moving points and authorities with specificity.

2 Attorney's fees are thus awarded in the amount of one thousand dollars (\$1,000.00).

3 Dated this 2nd day of October, 2020.

4 LAW OFFICES OF LYN MACNABB

5  
6   
7 LYN MACNABB, ESQUIRE  
8 Nevada Bar Number 4323  
9 7432 Sahara Avenue, Ste. 101  
10 Las Vegas, Nevada 89117  
11 *Arbitrator*

12 CERTIFICATE OF SERVICE

13 I HEREBY CERTIFY that on the 2nd day of October, 2020, I electronically served  
14 a true and correct copy of the foregoing ***AWARD OF COSTS, INTEREST AND***

15 ***ATTORNEY'S FEES*** to the attorneys addressed to the following:

16 ROBERT EATON, ESQ.  
17 716 S. Jones Blvd.  
18 Las Vegas, NV 89107  
*Attorney for Plaintiff*

PATRICE JOHNSON, ESQ.  
3057 E. Warm Springs Road #400  
Las Vegas, NV 89120  
*Attorney for Defendant*

19  
20   
21 An employee of Lyn MacNabb  
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1 CSERV

2 DISTRICT COURT  
3 CLARK COUNTY, NEVADA  
4

5  
6 Edel Ramirez-Navarrete,  
7 Plaintiff(s)

CASE NO: A-19-800500-C

8 vs.

DEPT. NO. Department 27

9 Holga Flores-Reyes,  
10 Defendant(s)

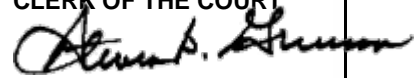
11 **AUTOMATED CERTIFICATE OF SERVICE**  
12

13 This automated certificate of service was generated by the Eighth Judicial District  
14 Court. The foregoing Judgment 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: 12/28/2020

16 Katie Ader	katie@bighornlaw.com
17 Jacqueline R. Esq.	jacqueline@bighornlaw.com
18 Lyn MacNabb	lynmacnabb@yahoo.com
19 Robert Eaton	roberte@bighornlaw.com
20 Patrice Johnson	PJohnson@keyinsco.com
21 Ashley Gittings	agittings@keyinsco.com
22 Steven Haile	stevenh@bighornlaw.com

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1 **NOE**  
2 **KIMBALL J. JONES, ESQ.**  
3 Nevada Bar No. 12982  
4 **ROBERT N. EATON, ESQ.**  
5 Nevada bar No. 9547  
6 **BIGHORN LAW**  
7 716 S. Jones Blvd.  
8 Las Vegas, Nevada 89106  
9 Phone: (702) 333-1111  
10 Fax: (702) 507-0092  
11 roberte@bighornlaw.com

12 *Attorneys for Plaintiff*

13 **DISTRICT COURT**

14 **CLARK COUNTY, NEVADA**

15 EDEL RAMIREZ-NAVARRETE, an individual,  
16  
17 Plaintiff,  
18 v.

CASE NO.: A-19-800500-C

DEPT. NO.: XXVII

19 HOLGA FLORES-REYES, an individual;  
20 ANTHONY VERDON, an individual; DOE  
21 DRIVERS I-V; DOE OWNERS I-V; ROE  
22 EMPLOYERS I-V; and ROE CORPORATIONS  
23 I-V, inclusive,  
24 Defendants.

25 **AMENDED NOTICE OF ENTRY OF JUDGMENT**

26 TO: ALL DEFENDANTS AND THEIR ATTORNEYS OF RECORD HEREIN:

27 PLEASE TAKE NOTICE that a Judgment was entered in the above-entitled matter on December  
28 28, 2020, a true and correct copy of which is attached hereto.

DATED this 5<sup>th</sup> day of January, 2021.

**BIGHORN LAW**

By: /s/ Robert N. Eaton

**ROBERT N. EATON, ESQ.**

Nevada Bar No. 9547

*Attorneys for Plaintiff*

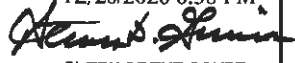
1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5, NEFCR 9 and EDCR 8.05, I hereby certify that I am an employee of  
3 **BIGHORN LAW** and on the 5th day of January, 2021, I served the foregoing ***NOTICE OF ENTRY OF***  
4 ***DEFAULT JUDGMENT*** as follows:

- 5 ☒ Electronic Service – By serving a copy thereof through the Court’s electronic service  
6 system; and/or  
7 ☐ U.S. Mail—By depositing a true copy thereof in the U.S. mail, first class postage prepaid  
8 and addressed as listed below; and/or  
9 ☐ Facsimile—By facsimile transmission pursuant to EDCR 7.26 to the facsimile  
10 number(s) shown below and in the confirmation sheet filed herewith. Consent to service  
under NRCP 5(b)(2)(D) shall be assumed unless an objection to service by facsimile  
transmission is made in writing and sent to the sender via facsimile within 24 hours of  
receipt of this Certificate of Service.

11 Joseph Purdy, Esq.  
12 PURDY ANDERSON STORM  
13 3057 East Warm Springs Road, Suite 400  
14 Las Vegas, Nevada 89120  
Attorneys for Defendants

15 /s/ Steven C. Haile  
16 An employee of **BIGHORN LAW**  
17  
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CLERK OF THE COURT

**JUDGE**  
**KIMBALL JONES, ESQ.**  
Nevada Bar No.: 12982  
**ROBERT N. EATON, ESQ.**  
Nevada Bar No.: 9547  
**BIGHORN LAW**  
2225 E. Flamingo Rd.  
Building 2, Suite 300  
Las Vegas, Nevada 89119  
Phone: (702) 333-1111  
Email: [Roberte@bighornlaw.com](mailto:Roberte@bighornlaw.com)  
*Attorneys for Plaintiff*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

EDEL RAMIREZ-NAVARETTE, and individual,  
  
Plaintiff,

CASE NO.: A-19-800500-C  
DEPT. NO.: XXVII

vs.

HOLGA FLORES-REYES, an individual;  
ANTHONY VERDON, an individual; DOE  
DRIVER I-V; DOE OWNERS I-V; ROE  
EMPLOYER I-V; ROE CORPORATIONS I-V,  
inclusive,

Defendants.

**JUDGMENT ON ARBITRATION AWARD**

This action came on for Arbitration hearing on September 10, 2020, before Arbitrator Lyn MacNabb, Esq., presiding, and the issues having been duly heard, a decision having been rendered and the prevailing party having been notified that judgment may be entered in accordance with the award, and Defendants Request for Trial de Novo having been denied, the Court hereby enters Judgment on the Arbitration Award and Ruling on Application for Fees, Costs and Interest, as follows:

///

///



IT IS HEREBY ORDERED AND ADJUDGED that Plaintiff, EDEL RAMIREZ-NAVARETTE, recover from the Defendants, HOLGA FLORES-REYES and ANTHONY VERDON, jointly and severally, the sum of \$16,600.54, together with interest accruing at the legal rate until fully paid.

DATED this 28 day of December, 2020.

Dated this 28th day of December, 2020

Nancy L Alf  
DISTRICT JUDGE

Respectfully submitted by:

**BIGHORN LAW**

EDB 914 6B31 0E2F  
Nancy Alf  
District Court Judge

NB

/s/ Robert N. Eaton, Esq.  
**ROBERT N. EATON, ESQ.**  
Nevada Bar No.: 9547  
2225 E. Flamingo Rd.  
Building 2, Suite 300  
Las Vegas, Nevada 89119  
*Attorneys for Plaintiff*

*Steven D. Grierson*

ARBA

Lyn MacNabb

Nevada Bar No. 4323

7432 W. Sahara Avenue, Ste. 101

Las Vegas, Nevada 89117

(702) 636-0111

Arbitrator

DISTRICT COURT

CLARK COUNTY, NEVADA

EDEL RAMIREZ-NAVARETTE,  
an individual,

Plaintiff,

v.

HOLGA FLORES-REYES, an individual,  
ANTHONY VERDON an  
individual, DOES DRIVERS I-V, DOE  
OWNERT I-V; ROE EMPLOYERS I-V;  
and ROE CORPORATIONS I-V, inclusive,

Defendants.

Case No: A-19-800500-C

Dept No: XXVII

ARBITRATION AWARD

TO: ROBERT EATON, Esq., attorney for Plaintiff; and

TO: PATRICE JOHNSON, Esq., attorney for Defendants.


The Arbitration hearing was held held on September 10, 2020. Present at the hearing were the above identified attorneys and the parties in this action. Having considered the testimony at the hearing, the briefs, pleadings and papers on file herein, I find in favor of the Plaintiff and against the Defendants Holga Flores-Reyes and Anthony Verdon and award total past damages in the amount of thirteen thousand five hundred dollars (\$13,500.00).

NOTICE

Pursuant to Nevada Arbitration Rule 18A, you are hereby notified that you have thirty days from the date you are served with the Award within which to file a request for trial de novo with the Clerk of the Court and to serve the Commissioner and the other parties.

Dated this 15th day of September, 2020.

LAW OFFICES OF LYN MACNABB

  
LYN MACNABB, ESQUIRE  
Nevada Bar Number 4323  
7432 Sahara Avenue, Ste. 101  
Las Vegas, Nevada 89117  
Arbitrator

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of June, 2020, I electronically served a true and correct copy of the foregoing **ARBITRATION AWARD** to the attorneys addressed to the following:

JACOB LEAVITT, ESQ.  
716 S. Jones Blvd.  
Las Vegas, NV 89107  
*Attorney for Plaintiff*

PATRICE JOHNSON, ESQ.  
3057 E. Warm Springs Road #400  
Las Vegas, NV 89120  
*Attorney for Defendant*

  
An employee of Lyn MacNabb

*Steven D. Grierson*

1 ABFCI

Lyn MacNabb

2 Nevada Bar No. 4323

7432 W. Sahara Avenue, Ste. 101

3 Las Vegas, Nevada 89117

4 (702) 636-0111

Arbitrator

6 DISTRICT COURT

7 CLARK COUNTY, NEVADA

8  
9 EDEL RAMIREZ-NAVARETTE,  
an individual,

10 Plaintiff,

11 v.

12  
13 HOLGA FLORES-REYES, an individual,  
14 ANTHONY VERDON an  
individual, DOES DRIVERS I-V, DOE  
15 OWNERT I-V; ROE EMPLOYERS I-V;  
and ROE CORPORATIONS I-V, inclusive,

16 Defendants.  
17

Case No: A-19-800500-C

Dept No: XXVII

RULING ON APPLICATION  
FOR FEES, COSTS AND INTEREST

18 TO: ROBERT EATON, Esq., attorney for Plaintiff; and

19 TO: PATRICE JOHNSON, Esq., attorney for Defendants.

20  
21 Plaintiff prevailed at the arbitration and timely applied for fees, costs and interest.

22 Having considered the application, and having received no opposition thereto, Plaintiff is  
23 awarded costs in the reduced amount of one thousand one hundred forty-one dollars and  
24 thirty-five cents (\$1,141.35) and interest in the amount of nine hundred fifty-six and  
25 nineteen cents (\$959.19). Regarding the application for attorney's fees, the undersigned  
26 finds that the analysis under Brunzell v. Golden Gate Nat. Bank, 85 Nev. 345, 455 P.2d 31  
27 (1969) was satisfied. The factors addressed by that case, prerequisite to an award of  
28

1 attorney's fees, were set forth in the moving points and authorities with specificity.

2 Attorney's fees are thus awarded in the amount of one thousand dollars (\$1,000.00).

3 Dated this 2nd day of October, 2020.

4 LAW OFFICES OF LYN MACNABB

5 

6 LYN MACNABB, ESQUIRE  
7 Nevada Bar Number 4323  
8 7432 Sahara Avenue, Ste. 101  
9 Las Vegas, Nevada 89117  
10 Arbitrator

11 CERTIFICATE OF SERVICE

12 I HEREBY CERTIFY that on the 2nd day of October, 2020, I electronically served

13 a true and correct copy of the foregoing **AWARD OF COSTS, INTEREST AND**

14 **ATTORNEY'S FEES** to the attorneys addressed to the following:

15 ROBERT EATON, ESQ.  
16 716 S. Jones Blvd.  
17 Las Vegas, NV 89107  
18 Attorney for Plaintiff

PATRICE JOHNSON, ESQ.  
3057 E. Warm Springs Road #400  
Las Vegas, NV 89120  
Attorney for Defendant

19  
20 An employee of Lyn MacNabb

1 CSERV

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Edel Ramirez-Navarrete,  
7 Plaintiff(s)

CASE NO: A-19-800500-C

8 vs.

DEPT. NO. Department 27

9 Holga Flores-Reyes,  
10 Defendant(s)

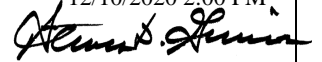
11 **AUTOMATED CERTIFICATE OF SERVICE**

12  
13 This automated certificate of service was generated by the Eighth Judicial District  
14 Court. The foregoing Judgment 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: 12/28/2020

16 Katie Ader	katie@bighornlaw.com
17 Jacqueline R. Esq.	jacqueline@bighornlaw.com
18 Lyn MacNabb	lynmacnabb@yahoo.com
19 Robert Eaton	roberte@bighornlaw.com
20 Patrice Johnson	PJohnson@keyinsco.com
21 Ashley Gittings	agittings@keyinsco.com
22 Steven Haile	stevenh@bighornlaw.com

23  
24  
25  
26  
27  
28

  
CLERK OF THE COURT

**ORDR**

ROBERT N. EATON, ESQ.

Nevada Bar No.: 9547

**BIGHORN LAW**

2225 E. Flamingo Rd.

Building 2, Suite 300

Las Vegas, Nevada 89119

Phone: (702) 333-1111

Email: [Roberte@bighornlaw.com](mailto:Roberte@bighornlaw.com)

*Attorneys for Plaintiff*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

EDEL RAMIREZ-NAVARETTE, and individual,

Plaintiff,

vs.

HOLGA FLORES-REYES, an individual;  
ANTHONY VERDON, an individual; DOE  
DRIVER I-V; DOE OWNERS I-V; ROE  
EMPLOYER I-V; ROE CORPORATIONS I-V,  
inclusive,

Defendants.

CASE NO.: A-19-800500-C

DEPT. NO.: XXVII

**ORDER GRANTING PLAINTIFF RAMIREZ NAVARETTE'S MOTION TO STRIKE  
DEFENDANTS' REQUEST FOR TRIAL DE NOVO**

On December 3<sup>rd</sup>, 2020, the above captioned case came before this Court, the Honorable Nancy Allf presiding, regarding Plaintiff Edel Ramirez-Navarette's Motion to Strike Defendants' Request for Trial De Novo. The Court, having reviewed the Pleadings submitted by the parties, and upon hearing and considering the arguments from Plaintiff's Counsel Robert N. Eaton and Defendant's counsel Patrice Johnson, the Court orders as follows:

**ORDER**

**THE COURT FINDS** That defendants HOLGA FLORES-REYES and ANTHONY VERDON failed to meaningfully participate in good faith during the arbitration proceedings pursuant to NAR 22(a).

1           **THE COURT FURTHER FINDS** Defendants did not meaningfully participate in the arbitration  
2 process for the following reasons:

3           1)       Defendants did not respond to Plaintiff's Discovery despite having 93 days to do so.  
4 Defendants thus admitted that Flores-Reyes was the insured driver of her car that rear-ended Plaintiff's  
5 vehicle; that Defendant's negligence caused the accident; that the accident was the proximate cause of  
6 Plaintiff's injuries; that the collision caused property damage to Plaintiff's vehicle; that Defendant Flores-  
7 Reyes attempted to flee from the accident scene; and that Plaintiff's medical expenses were related to the  
8 accident, as well as reasonable and customary for our area.

9  
10           2)       Defendant Holga Flores-Reyes failed to respond to Plaintiff's Interrogatories.

11           4)       Defense counsel had not had any communication with either Defendant prior to filing an  
12 Answer to the Complaint, or during the entire arbitration process.

13  
14           5)       Defendants did not attend the arbitration hearing.

15           6)       Defense counsel did not dispute liability or damages in addition to the lack of meaningful  
16 participation by Defendants.

17           10)       Defendants failed to oppose Plaintiff's Application for Fees and Costs.

18           Based upon the findings of the Court, the Court ORDERS that Plaintiff's Motion to Strike  
19 Request for Trial De Novo is GRANTED, and that the ADR Commissioner is instructed to issue Notice

20  
21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///



1 that the JUDGEMENT on the ARBITRATION AWARD with fees and costs as awarded on October 5,  
2 2020 can now be entered.

3 **IT IS SO ORDERED** this 10 day of December, 2020.

4  
5 Dated this 10th day of December, 2020

6 Nancy L Alf  
DISTRICT COURT JUDGE

NB

7 *Reviewed by:*

8 *Storm Legal Group*

9 */s/ Patrice Johnson*

10 *Patrice Johnson, Esq.*

11 *Nevada Bar NO. 12283*

3057 East Warm Springs Road, Suite 400

Las Vegas, Nevada 89120

*Attorney for Defendants*

pjohnson@keyinsco.com

E6A 3D2 B16E E2BF  
Nancy Alf  
District Court Judge

12 Respectfully submitted this 9th day of December, 2020.

13 **BIGHORN LAW**

14 By: /s/ Robert N. Eaton

15 **ROBERT N. EATON, ESQ.**

16 Nevada Bar No.: 9547

2225 E. Flamingo Rd.;

Building 2, Suite 300

Las Vegas, Nevada 89119

*Attorneys for Plaintiff*

27 Order Granting Plaintiff Ramirez Navarette's Motion to Strike Defendants Request for Trial De Novo  
28 District Court Case No. A-19-800500-C; Dept. XXII



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## Order Striking De Novo in Edel Ramirez-Navarrete vs. Holga Flores-Reyes -- A-19-800500-C Inbox x

**Robert Eaton**

Dear Patrice and Ms. Gittings: I had forwarded a proposed order your

**Patrice Johnson**

to Ashley, me

Hi Robert,

You may add my electronic signature. Also, (10) is after (6), you

Thanks,

*Patrice S. Johnson, Esq.*

Storm Legal Group

3057 East Warm Springs Road, Suite 400

Las Vegas, NV 89120

702-265-0976

**Robert Eaton** <roberte@bighornlaw.com>

to Debora, Patrice

Dear Patrice:

THank you for catching that. I will fix the numbering, add your signature,

Sincerely,

*Robert Eaton*, Esq.

Spring Mountain Office

4089 Spring Mountain Road

Las Vegas, Nevada 89102

(702) 333-1111 Ext. 644

1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Edel Ramirez-Navarrete,  
7 Plaintiff(s)

CASE NO: A-19-800500-C

8 vs.

DEPT. NO. Department 27

9 Holga Flores-Reyes,  
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 Granting Motion 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: 12/10/2020

16 Katie Ader	katie@bighornlaw.com
17 Jacqueline R. Esq.	jacqueline@bighornlaw.com
18 Lyn MacNabb	lynmacnabb@yahoo.com
19 Robert Eaton	roberte@bighornlaw.com
20 Patrice Johnson	PJohnson@keyinsco.com
21 Ashley Gittings	agittings@keyinsco.com
22 Debora Ponce	debora@bighornlaw.com

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27  
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**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**September 23, 2020**

---

A-19-800500-C      Edel Ramirez-Navarrete, Plaintiff(s)  
vs.  
Holga Flores-Reyes, Defendant(s)

---

<b>September 23, 2020</b>	<b>3:00 AM</b>	<b>Minute Order</b>	<b>Minute Order: Application for Attorney s Fees, Costs, and/or Interest SET 10/6/2020 Chambers Calendar</b>
---------------------------	----------------	---------------------	--

**HEARD BY:** Alf, Nancy

**COURTROOM:** No Location

**COURT CLERK:** Carolyn Jackson

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- COURT FINDS after review that an Arbitration Hearing took place on September 10, 2020.

COURT FURTHER FINDS after review that an Arbitration Award was filed on September 15, 2020.

COURT FURTHER FINDS after review that an Arbitrator s Bill for Fees and Costs was filed on September 15, 2020.

COURT FURTHER FINDS after review that Plaintiffs filed an Application for Attorney s Fees, Costs, and/or Interest as well as a Memorandum of Costs and Disbursements on September 21, 2020. No hearing was requested.

THEREFORE, COURT ORDERS for good cause appearing and after review the Motion for Fees is hereby scheduled on October 6, 2020 on Chambers calendar.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Nicole McDevitt, to all registered parties for Odyssey File & Serve. /nm 9/23/2020.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**December 01, 2020**

---

A-19-800500-C      Edel Ramirez-Navarrete, Plaintiff(s)  
vs.  
Holga Flores-Reyes, Defendant(s)

---

**December 01, 2020**

**3:00 AM**

**Minute Order**

**Minute Order:  
BlueJeans  
Appearance**

**HEARD BY:** Allf, Nancy

**COURTROOM:** No Location

**COURT CLERK:** Nicole McDevitt

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- Department 27 Formal Request to Appear Telephonically

Re: Matter set on December 3, 2020 at 9:30 a.m.

Please be advised that due to the COVID-19 pandemic, Department 27 will continue to conduct Court hearings REMOTELY using the Blue Jeans Video Conferencing system. You have the choice to appear either by phone or computer/video.

Dial the following number: 1-408-419-1715

Meeting ID: 897 138 369

Meeting URL: <https://bluejeans.com/897138369>

To connect by phone dial the number provided and enter the meeting ID followed by #

To connect by computer if you do NOT have the app, copy the URL link into a web browser. Google Chrome is preferred but not required. Once you are on the BlueJeans website click on Join with Browser which is located on the bottom of the page. Follow the instructions and prompts given by BlueJeans.

You may also download the Blue Jeans app and join the meeting by entering the meeting ID

PLEASE NOTE the following protocol each participant will be required to follow:

Place your phone on MUTE while waiting for your matter to be called.

Do NOT place the call on hold since some phones may play wait/hold music.

Please do NOT use speaker phone as it causes a loud echo/ringing noise.

Please state your name each time you speak so that the court recorder can capture a clear record.

Please be mindful of rustling papers, background noise, and coughing or loud breathing.

Please be mindful of where your camera is pointing.

We encourage you to visit the Bluejeans.com website to get familiar with the Blue Jeans phone/videoconferencing system before your hearing.

If your hearing gets continued to a different date after you have already received this minute order please note a new minute order will issue with a different meeting ID since the ID number changes with each meeting/hearing.

Please be patient if you call in and we are in the middle of oral argument from a previous case. Your case should be called shortly. Again, please keep your phone or computer mic on MUTE until your case is called.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Nicole McDevitt, to all registered parties for Odyssey File & Serve. /nm 12/1/2020

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Negligence - Auto**

**COURT MINUTES**

**December 03, 2020**

---

A-19-800500-C      Edel Ramirez-Navarrete, Plaintiff(s)  
vs.  
Holga Flores-Reyes, Defendant(s)

---

**December 03, 2020      9:30 AM      Motion to Strike**

**HEARD BY:** Allf, Nancy      **COURTROOM:** RJC Courtroom 03A

**COURT CLERK:** Nicole McDevitt

**RECORDER:** Brynn White

**REPORTER:**

**PARTIES**

**PRESENT:**      Eaton, Robert N.      Attorney  
                         Johnson, Patrice S      Attorney

**JOURNAL ENTRIES**

- All appearances made via the BlueJeans Videoconferencing software.

Arguments by counsel regarding the merits of and opposition to the motion. Court stated its findings and ORDERED, Plaintiff's Motion to Strike Defendant Request for Trial de Novo GRANTED. Mr. Eaton to prepare the order and submit it to Ms. Johnson for approval.





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

**ERICH N. STORM, SQ.**  
**3037 E. WARM SPRINGS RD., SUITE 300**  
**LAS VEGAS, NV 89120**

**DATE: February 8, 2021**  
**CASE: A-19-800500-C**

**RE CASE:** EDEL RAMIREZ-NAVARRETE vs. HOLGA FLORES-REYES; ANTHONY VERDON

NOTICE OF APPEAL FILED: February 4, 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 *re: for Order Filed December 10, 2020*

---

**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; CASE APPEAL STATEMENT; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET; JUDGMENT ON ARBITRATION AWARD; NOTICE OF ENTRY OF DEFAULT JUDGMENT; AMENDED NOTICE OF ENTRY OF JUDGMENT; ORDER GRANTING PLAINTIFF RAMIREZ NAVARETTE'S MOTION TO STRIKE REQUEST FOR TRIAL DE NOVO; DISTRICT COURT MINUTES; NOTICE OF DEFICIENCY

EDEL RAMIREZ-NAVARRETE,

Plaintiff(s),

vs.

HOLGA FLORES-REYES; ANTHONY  
VERDON,

Defendant(s),

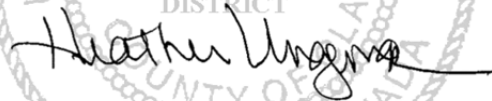
Case No: A-19-800500-C

Dept No: XXVII

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 8 day of February 2021.

Steven D. Grierson, Clerk of the Court



Heather Ungermann, Deputy Clerk