IN THE SUPREME COURT OF THE STATE OF NEVADA

MINH NGUYET LUONG, Appellant v. JAMES VAHEY, Respondent	S.C. DOCKET NO.: 83929 D.C. Case No.: D-18-581444-D

APPELLANT'S FAST TRACK STATEMENT

1. Name of the Party filing this fast track statement:

Minh Nguyet Luong

2. Name, law firm, address, and telephone number of attorney submitting this fast track statement.

Fred Page, Esq.
Page Law Firm
6930 South Cimarron Road, Suite 140
Las Vegas, Nevada 89113
(702) 823-2888

3. Judicial district court, and district court docket number of lower court proceedings:

Eighth Judicial District Court, Family Division, Clark County, Nevada District Court Docket No. D-18-581444-D

4. **Name of judge issuing judgment or order appealed from:**

District Court Judge Dawn Throne

5. **Length of trial or evidentiary hearing. If the order appealed from was entered following a trial or evidentiary hearing, then how many days did the trial or evidentiary hearing last?**

Approximately one day.

6. **Written order or judgment appealed from:**

Order after hearing from October 18, 2021, hearing.

7. **Date that written notice of the appealed written judgment or order's entry was served:**

The Notice of Entry of Order was filed November 9, 2021.

8. **If the time for filing the notice of appeal was tolled by the timely filing of a motion listed in NRAP 4(a)(4),**

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

   (b) **Date of entry of written order resolving tolling motion:** N/A

9. **Date notice of appeal was filed:** December 8, 2021

10. **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)

11. Specify the statute, rule or other authority, which grants this court jurisdiction to review the judgment or order appealed from:

NRAP 3(b)(1).

12. 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 involve the same or some of the same parties to this appeal:

Writ of Mandamus, case number 84522
Writ of Mandamus, case number 84743

13. Proceedings raising same issues. If you are aware of any other appeal or original proceeding presently pending before this court, which raise the same legal disuse(s) you intend to raise e in this appeal, list the case name(s) and docket number(s) of those proceedings:

None

14. Procedural history. Briefly describe the procedural history of the case (provide citation or every assertion of fact to the appendix or record, if any, or to the transcript or rough draft transcript:

This is an appeal from a final judgment pursuant to NRAP 3A(b)(1). The Decree of Divorce was entered on April 8, 2021. The Order denying the request to set aside under NRCP 60(b) was entered November 9, 2021. Minh timely filed a Notice of Appeal regarding the denial of her request to set aside the Decree of Divorce as to the 529 educational accounts and the granting of Jim's request to require Minh to turn over the passports on December 8, 2021.

15. Statement of facts. Briefly set forth the facts material to the issues on appeal (provide citations for every assertion of fact to the appendix or record, if any, or to the transcript or rough draft transcript):

On June 14, 2006, in anticipation of marriage, Appellant, Minh Nguyet Luong (hereinafter "Minh"), and Respondent, Jim Vahey (hereinafter "Jim"), entered into a Premarital Agreement. Jim insisted upon there being a prenuptial agreement because he was a physician and Minh was a dentist and as a physician Jim was going to earn more than she did.

In the Premarital Agreement, the parties essentially agreed that everything that the parties acquired after the marriage would remain the respective parties' sole and separate property. Minh and Jim were married to each other on July 8, 2006,

Over the course of the marriage, as it relates to earnings, the exact opposite occurred. Minh was far more successful in her professional practice. Jim ended up owing Minh for the mortgage on his residence, and owed Minh for the mortgage on the building containing his practice in order to bail Jim out of the financial burdens be placed himself.[1]

[1] In 2017, Jim was involved with real estate fraud scheme with his realtor to defraud a lender for $3,000,000. Jim lost a substantial amount of money as a result of his attempt to defraud the lender and requested for Minh to bail him out. Because Jim involved Minh in his lawsuits, Minh was also sued by the lender. Jim decided to settle with the lender. During Jim's settlement's conference, Jim called Minh and informed her that the seller was willing to drop Jim's lawsuit for $800,000. Minh asked Jim what about her lawsuit which Jim answered, "I am going to get myself out first and worry about you later."

There are three minor children the issue of the marriage: Hannah Vahey March 19, 2009, Matthew Vahey, June 26, 2010, and Selena Vahey, April 4, 2014.

Shortly after each of the children were born, Minh, and Minh's family, contributed $382,203.00 of sole and separate property toward the educational funds for the children. Jim made a contribution of his sole and separate property $113,473.75.

On December 13, 2018, Jim filed his Complaint for Divorce. In his Complaint for Divorce, Jim admitted that the Premarital Agreement he wanted was valid and binding. The matter was assigned to district court judge the Hon. T. Art Ritchie. On January 11, 2019, Appellant, Minh Luong (hereinafter "Minh") filed her Answer and Counterclaim. In her Answer, Minh agreed that the Premarital Agreement was valid and binding.

At the conclusion of the evidentiary hearing on September 4, 2020, regarding some outstanding financial issues, the Court made the following statement as it related to the 529 accounts for the children:

> The 529 account shall be divided based upon the contribution of percentage. Plaintiff shall receive 25% of the account and control it for the benefit of the children and Defendant shall receive 75% of the account and control it for the benefit of the children.

At the beginning of 2021, the case as part of an overall judicial reassignment due to new judgeships being opened was reassigned to the Hon. Dawn T. Throne.

On March 26, 2021, the Findings of Fact, Conclusions of Law, and Decree of Divorce was filed. On April 8, 2021, the Notice of Entry of Decree was filed. On page 24, of the Decree, the following language was included,

> IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the 529 accounts the parties established for their children shall each be divided into two (2) separate accounts (529 accounts), with MINH having one (1) such account in her name for the benefit of the children, and JIM having the other account in his name for the benefit of the children. In this regard, MINH shall be entitled to receive seventy five percent (75%) of the monies currently held in the 529 accounts, and JIM shall receive the remaining twenty five percent (25%) of the monies held in the 529 accounts. Such accounts shall be held by each party for the benefit of the children and shall continue to be held by each party in trust for the child for whom the account has been opened, and each party agrees to use the monies held in each child's account for the benefit of the child's attainment of his or her post-high school education. The parties have a fiduciary responsibility to use the monies in the 529 accounts for the benefit of the children, and shall account to each other regarding the 529 accounts.

On September 20, 2021, Adam Udy of Every Season Wealth Management provided an analysis and Declaration regarding the amounts contributed by Minh and her family and the amounts contributed by Jim toward the children's educational funds. Mr. Udy's analysis showed that the percentages in the Decree were incorrect. Mr. Udy's analysis showed that Minh and her family contributed 77.11 percent of the total value to the 529 accounts and Jim contributed 22.89 percent of the total value to the 529 accounts.

On September 27, 2021, Minh filed her *Motion to Correct Clerical Error in the Decree of Divorce Regarding the 529 Accounts, or in the Alternative, to Set Aside*

the Terms in the Decree of Divorce Regarding the Division of the 529 Accounts and for Attorney's Fees and Costs. As to the NRCP 60(b) request, Minh stepped through the analysis under *Yochum v. Davis*, 98 Nev. 484, 486, 653 P.2d 1215, 1216 (1982); by way of *Lesley v. Lesley*, 113 Nev. 727, 941 P.2d 451 (1997), that she had promptly applied and that domestic relations matters should be determined on their merits.

On October 12, 2021, Jim filed his *Opposition to Minh's Motion to Correct Clerical Error in the Decree of Divorce Regarding the 529 Accounts, or in the Alternative, to Set Aside the Terms in the Decree of Divorce Regarding the Division of the 529 Accounts and Attorney's Fees and Costs; and Countermotion for Immediate Return of Hannah to Jim s Custody, an Order that Hannah Immediately Participate in Therapy with Dr. Dee Pierce, an Order that Hannah Have a Forensic Psychiatric Evaluation, an Order Requiring the Parties to Participate in Co-Parenting Counseling with Dr. Bree Mullin, Sole Legal Custody, School Choice Determination, Return of Children s Passports, and Attorney's Fees and Costs*.

In his Countermotion, admitted that the 529 accounts were to be divided according to contribution. Jim attached emails and correspondence to support that contention.

Jim also demanded that Minh be required to turn over the children's passports. Jim claimed that he was "concerned" that Minh would do something drastic if she did not get her way and because Minh has relatives in Vietnam, Germany, and

Australia she might abduct the children and requested that the passports be turned over to him.

Jim requested and on October 13, 2021, received an Order Shortening Time setting the hearing for October 18, 2021.

On October 17, 2021, Minh filed her *Reply to Plaintiff's Opposition to Motion to Correct Clerical Error in the Decree of Divorce Regarding the 529 Accounts, or in the Alternative, to Set Aside the Terms in the Decree of Divorce Regarding the Division of the 529 Accounts and for Attorney s Fees and Costs and Opposition to Plaintiff s Countermotion for Immediate Return of Hannah to Jim s Custody, an Order that Hannah Immediately Participate in Therapy with Dee Pierce, Ph.D., an Order that Hannah Have a Forensic Psychiatric Evaluation, an Order Requiring the Parties to Participate in Co-Parenting Counseling with Bree Mullin, Ph.D., Sole Legal Custody, School Choice Determination, Return of the Children s Passports, and Attorney s Fees and Costs.*

In her Reply, Minh pointed that she had a thriving practice in Las Vegas, owned multiple real properties, and Jim owed her $1,500,000 for bailing him out when a tried to defraud an investor in a real estate transaction and that the idea that she was going to flee with the children because of that was laughable.

On October 18, the hearing on Minh's Motion and Jim's Countermotion was held. At the hearing, the district court summarily denied Minh's Motion for both

NRCP 60(a) and NRCP 60(b) relief and called Minh's requests frivolous. The district court further ordered Minh to surrender Hannah's and Selena's passports.

16. Issues on appeal. State concisely the principal issues(s) in this appeal.

1. Whether the district court erred in declining to set aside the Decree of Divorce as it relates to the 529 educational accounts under NRCP 60(a).
2. Whether the district court erred in declining to set aside the Decree of Divorce as it relates to the 529 educational accounts under NRCP 60(b).
3. Whether there was error in the district court judge in requiring Appellant to turn over the passports for two of the minor children.

17. Legal argument, including authorities:

Most trial court orders in family law issues are reviewed for an abuse of discretion. *Rivero v. Rivero*, 125 Nev. 410, 428, 216 P.3d 213, 226 (2009); *Wallace v. Wallace*, 112 Nev. 1015, 1019, 922 P.2d 451, 543 (1996).

In *NOLM, LLC v. County of Clark*, 120 Nev. 736, 100 P.3d 658 (2004) the Supreme Court held that it reviews the district Court's findings of fact for an abuse of discretion and will no set aside those findings, "unless they are clearly erroneous or not supported by substantial evidence." 100 P.3d at 366. A court abuses its discretion when it makes a factual finding which is not supported by substantial evidence and is "clearly erroneous." *Real Estate Division v. Jones,* 98 Nev. 260, 645 P.2d 1371 (1982).

In *Willard v. Berry-Hinkley Indus.*, 136 Nev 467, 471, 469 P.3d 176, 179 (2020), the Supreme Court stated and held, "district courts must issue explicit and detailed findings, preferably in writing with respect to the four *Yochum* factors to facilitate this courts' appellate review of NRCP 60(b)(1) determinations." Review of NRCP 60(b)(1) determinations "necessarily requires district courts to issue findings pursuant to the pertinent factors in the first instance." Id. at 47071, 469 at P.3d at 180 (citing *Jitnan v. Oliver*, 127 Nev. 424, 433, 254 P.3d 623, 629 (2011). "Without an explanation of the reasons or bases for a district court's decision, meaningful appellate review, even a differential one, is hampered because we left to mere speculation." *Jitnan*, 127 Nev. 433, 254 P.2d at 629.

A. Whether the District Court Erred in Refusing to Set Aside Decree of Divorce Under NRCP 60(b)(1)

1. The District Court's Findings Are Unsupported by The Record and the District Court's Orders Should be Reversed and Remanded

The district court failed to provide sufficient findings as required under *Yochum, supra* as to promptness, lack of intent to delay, good faith, and lack of knowledge. There was no discussion of the policy of the Nevada Legislature that matters should be heard on their merits and that this policy is especially heightened in domestic relations cases.

The district court reacted emotionally and essentially engaged in a harangue against Minh as to why she filed her Motion and complained that Minh provided a

numerical breakdown as to why the division should be more precise. In the Order signed by the district court, no findings were required by the district court. The record is absent, and as required by *Willard, supra* as to how and why Minh allegedly failed to meet the elements set forth in *Yochum*. The district failed to state how Minh failed to meet her burden for allowing for relief under NRCP 60(b) and simply summarily denied the request.

No meaningful findings that would be required were present in the district court's statements. As stated in *Jitnan*, "[w]ithout an explanation of the reasons or bases for a district court's decision, meaningful appellate review, even a differential one, is hampered because we left to mere speculation." *Id.* at 127 Nev. 433.

There should have been an evidentiary hearing scheduled. The burden for an evidentiary hearing is whether there is adequate cause is set forth under *Rooney v. Rooney*, 109 Nev. 540, 853 P.2d 123 (1993). Under *Rooney*, "adequate cause" arises where the moving party presents a prima facie case for modification. To constitute a *prima facie* case, one must show that: (1) the facts alleged in the affidavits are relevant to the grounds for modification; and (2) the evidence is not merely cumulative or impeaching. *Rooney* at 543.

Once there is an evidentiary hearing is a preponderance of the evidence. Nevada Jury Instructions 3.0 defines preponderance of the evidence standard as meaning ". . .such evidence as, when weighed with that opposed to it, has more

convincing force, and from which is appears that the greater probability of truth lies therein."

As part of determining adequate cause the district court should have analyzed and stepped through each of the *Yochum* factors as required by *Willard*, *supra* as well as following the Legislature's directive that matters should be heard on their merits. It is submitted that there was more than sufficient adequate cause under *Rooney*, *supra*, for there to be an evidentiary hearing as to whether the Decree of Divorce should be set aside as it relates to the 529 plans.

It is apparent from the lack of findings that the the district court judge had her mind made up regardless of the evidence that there was a mistake in the division of the 529 accounts. Accordingly, the matter should be reversed and remanded, for proper findings, and an evidentiary hearing be ordered for set aside of the Decree under NRCP 60(b)(1).

2. The Decree of Divorce Should Have Been Set Aside for Mistake, Inadvertence, Surprise, or Excusable Neglect Regarding the Division of the 529 Accounts

Upon a finding of timeliness, an analysis is to be done under Nevada Rule of Civil Procedure 60(b)(1) as to whether there is mistake, inadvertence, surprise, or excusable neglect. The Rule states,

> On motion and just terms, the court may relieve a party or its legal representative from a final judgment, order, or proceeding for the following reasons:

(1) mistake, inadvertence, surprise, or excusable neglect;

. . .

(c)(1) a motion under Rule 60(b) must be made within a reasonable time — and for reasons (1), (2), and (3) no more than 6 months after the date of the proceeding or the date of service of written notice of entry of the judgment or order, whichever date is later. The time for filing the motion cannot be extended under Rule 6(b).

The is nothing in the case law, Nevada Rules of Civil Procedure, or statutes that prevents a district court judge from *sua sponte* setting aside a Decree of Divorce upon being presented an appropriate Motion to Set Aside Under NRCP 60(b).

a. The Requirements of *Yochum, Supra* Have Been Met

The factors under *Yochum, supra*, have been met. In *Lesley*, *supra*, which relies upon *Yochum, supra*, the Supreme Court held that the factors to be applied by the court in an NRCP 60(b)(1) motion are whether the movant:

1. Promptly applied to remove the judgment;
2. Lacked intent to delay the proceedings;
3. Demonstrated good faith; and
4. Lacked knowledge of procedural requirements;

Id. at 1216.

In *Lesley*, *supra*, a district court must also consider the general policy in favor of resolving issues on their merits. The Supreme Court also stated in *Lesley* that when it reviews district court decisions on NRCP 60(b) motions, it also examines

whether the case "should be tried on the merits for policy reasons," citing *Kahn v. Orme*, 108 Nev. 510, 561, 835 P.2d 790,794 (1992). *Id. at* 113 Nev. at 734, 941 P.2d at 455

The Supreme Court in *Lesley* expanded on that holding further stating that, "This court has held that Nevada has a basic underlying policy that cases should be decided on the merits. . . Our policy is heightened in cases involving domestic relations matters," citing *Hotel Last Frontier v. Frontier Prop.* 79 Nev. 150, 380 P.2d 293 (1963); *Price v. Dunn* 106 Nev. 100, 787 P.2d 785 (1990).

1. Minh Promptly Applied to Have the Decree Set Aside

As part of the district court's bias against Minh, the district court tried to claim that Minh's Motion was untimely, even though the Notice of Entry of Order was not filed until April 6, 2021. Jim's counsel did not even argue that Minh's Motion to set aside was untimely. The district court conducted its own calculations and tried to bring that up *sua sponte*. The record in this case is that Minh's Motion to Set Aside was filed within the 180 days permitted by the Nevada Rules of Civil Procedure.

2. Lack of Intent to Delay Proceedings

Because the Motion was filed with the confines set forth in Nevada Rule of Civil Procedure 60(b), and is separate and apart of from any custody issues the

parties are having, there was no intent to delay proceedings. However, as indicated, the district made no findings in this regard.

3. The Movant Must Show Lack of Knowledge of Procedural Requirements

There is nothing in the district court findings that regarding any lack of knowledge of any procedural requirements on the part of Minh.

4. The Motion Must Be Made in Good Faith

There is nothing in the district court's findings that Minh's motion was not made in good faith.

5. The Court Must Consider the General Policy in Favor of Resolving Cases on Their Merits

The district court was provided the citations to *Price v. Dunn*, *supra* and *Hotel Last Frontier v. Frontier Prop.*, *supra* and that the policy favoring decision on the merits is heightening in cases involving domestic relations matter in multiple filings. The district court never addressed those cases, never acknowledging that they even existed, and never made any findings or conclusions regarding the policy that cases be resolved on their merits. The merits of this matter are that the 529 accounts should be divided accurately.

It is requested that as part of having the matter reversed and remanded that this Court specifically conclude that as part of the Legislature's policy of having matters be heard on their merits, that the Decree in this case should be set aside.

B. Whether the District Court Erred in Refusing to Set Aside Decree of Divorce Under NRCP 60(a)

The agreement between the parties regarding the 529 accounts was that the division was going to be "according to contributions." Prior counsel for Jim stated to Minh's counsel that division of the 529 account would be "according to contributions." Jim's counsel responded in an email that this was agreeable. It was advised by Minh's counsel to Jim's counsel that exact figures would be provided. There was no disagreement from Jim's counsel.

The district court judge assigned to the case at that time, Judge Ritchie, in the Minutes stated, "[t]he 529 account shall be divided based upon the contribution of percentage. Plaintiff shall receive 25% of the account and control it for the benefit of the children and Defendant shall receive 75% of the account and control it for the benefit of the children." The Decree omitted the language contribution of percentage. The omission is a clerical error.

Nevada Rule of Civil Procedure 60(a) states, "The court may correct a clerical mistake or a mistake arising from oversight or omission whenever one is found in a judgment, order, or other part of the record." In *McKissick v. McKissick*, 93 Nev. 139, 141, 520 P.2d 1366, 1368 (1977), the Supreme Court held that clerical errors can be corrected at any time under NRCP 60(a), citing to *Alamo Irrigation Co. v. United States*, 81 Nev. 390, 404 P.2d 5 (1965).

Once it was determined that there was a clerical error and the Decree of Divorce did not contain amounts "according to contributions" or "contribution of percentage" with the specificity as required, the request was made of the district court to correct the error.

The district court ignored the evidence presented to it regarding whether the language "according to contributions" or "contribution of percentage" should control. The district court failed to make any findings as to whether the language of "according to contributions" should be given weight and whether the failure to divide the 529 accounts according to contributions was a clerical error. Instead, of engaging in legal analysis the district court called Minh's Motion "frivolous" and summarily denied her Motion and awarded Jim attorney's fees.

Accordingly, the district court's denial of Minh's request to correct the clerical error should be reversed and remanded for appropriate findings, and with a directive to the district court that clerical error be corrected and that the 529 account be divided according to contributions.

C. Whether the District Court Erred in Requiring Minh to Surrender Passports for the Children

Under NRS 125C.0045(1)(a), a district court, "[d]uring the pendency of the action, at the final hearing or at any time thereafter during the minority of the child, make such an order for the custody, care, education, maintenance and support of the minor child as appears in his or her best interest; . . ." The district court failed to

make sufficient findings that requiring Minh to turn over the children's passports was in the children's best interests.

In his Countermotion, Jim argued that Minh was a flight risk because she "undisclosed cash" and had relatives in Vietnam, Germany, and Australia. Minh pointed out in her Opposition that she had a thriving dental practice, substantial real estate holdings in Nevada and California, and Jim still owed her $1,500,000.

At the October 18, 2021, hearing, the district court ordered that Hannah and Selena's passports were to be given to Jim's counsel. There were no findings that such an order would be in the children's best interests.

If Minh had blond hair and blue eyes and had the last name of "Jones" or "Smith," there is absolutely no chance that the district court would have entertained entering such that a white American citizen in Minh's position would have to surrender the passports for two of her children. There is no good explanation that can be given the client for such an order. Minh is left having immigrated to the United States, as a child and is an American citizen, that she somehow less than every other American, that she is not subject to the same protections under the law, because she has the wrong last name and because she is not white.

Before entering such a order, the district court should have engaged in some analysis that should have included but be not limited to, (1) whether the litigant is a United States citizen, (2) whether the litigant has significant connections to the

United States in the form of employment or property holdings, (3) whether the litigant has significant family connections in the United States, (4), the length of time the litigant has resided in the United States, (5) whether the litigant has significant connections to non-signatories to the Hague Convention on the Civil Aspects of International Child Abduction, and (6) the amount of contact that the objecting parent has with the children.

Accordingly, because the district court declined to enter into any analysis for her decision, the order by the district court should be reversed and remanded.

18. Issues of first impression or of public interest. Does this appeal present a substantial legal issue of first impression in this jurisdiction or one affecting an important public interest: Yes __X__ No _____ If so, explain:

Whether the district court should have engaged in a meaningful analysis before directing that Minh have to turn over the passports for two of the minor children.

VERIFICATION

1. I hereby certify this fast-track statement complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6).

[X] This fast track statement has been prepared in a proportionally spaced typeface using [Word 2013 in 14 point, Times New Roman Font; or

[ ] This fast track statement has been prepared in a monospaced typeface using [state name and version of word processing program] with [state number of characters per inch and name of type style]

2. I further certify that this fast track statement complies with the page- or type volume limitations of NRAP 3E(e)(2) because it is either:

[X] Proportionally spaced, has a typeface of 14 points or more, and contains 5,412 words; or

[ ] Monospaced, has 10.5 or fewer characters per inch, and contains _____ word or _____ lines of text; or

[ ] does not exceed _____ pages.

3. Finally, I recognize that under NRAP 3E I am responsible for timely filing a fast-track statement and that the Supreme Court of Nevada may impose sanction for failing to timely file a fast track statement, or failing to raise

material issues or arguments in the fast track statement. I therefore certify that the information provided in this fast track statement is true and complete to the best of my knowledge, information, and belief.

DATED this 24th day of May 2022

PAGE LAW FIRM

FRED PAGE, ESQ.
Nevada Bar No. 6080
6930 South Cimarron Road, Suite 140
Las Vegas, Nevada 89113
(702) 823-2888
Attorney for Appellants

ROUTING STATEMENT – RETENTION IN THE SUPREME COURT

This case is presumptively assigned to the Court of Appeals per NRAP 17(b)(5), as the issues relate to Chapter 125. Because this case raises issues of statewide public importance, the Supreme Court may wish to hear it. NRAP 17(a)(14).

DATED this 24th day of May 20212

Respectfully submitted,
PAGE LAW FIRM

FRED PAGE, ESQ.
Nevada Bar No. 6080
6930 South Cimarron Road, Suite 140
Las Vegas, Nevada 89113
(702) 823-2888
Attorney for Appellant

CERTIFICATE OF SERVICE BY ELECTRONIC FILING

I hereby certify that I am an employee of the PAGE LAW FIRM and that on the 24th day of May 2022, I did serve by way of electronic filing a true and correct copy of the above and foregoing APPELLANT'S FAST TRACK STATEMENT on the following:

Robert P. Dickerson, Esq.
Dickerson Karacsonyi Law Group
1645 Village Center Circle, Suite 291
Las Vegas, Nevada 89134
Counsel for Respondent

An employee of Page Law Firm