

IN THE SUPREME COURT OF THE STATE OF NEVADA

GIANN BIANCHI, individually;
DARA DELPRIORE, individually,

Appellants,

vs.

SUSAN CLOKEY, Special
Administrator for the ESTATE OF
JAMES MCNAMEE, DOES I-X,
and ROE CORPORATIONS I-X,
inclusive,

Respondent.

Supreme Court No. 84064

District Court Case No. A-13-691887-C

Electronically Filed
Jun 13 2023 07:02 PM
Elizabeth A. Brown
Clerk of Supreme Court

**MOTION TO SUBSTITUTE
SPECIAL ADMINISTRATOR FOR
APPELLANT GIANN BIANCHI**

Pursuant to NRAP 43(a)(1), Appellants file this instant Motion to substitute Angela Embrey in the place and stead of decedent Giann Bianchi, to represent the interests of Mr. Bianchi's Estate with regard to these proceedings. Angela Embrey currently serves as the special administrator for Giann Bianchi's Estate ("Estate") and is authorized under the Probate Court's Order to litigate this Matter on behalf of the Estate. *See* Order Granting Ex Parte Petition for Special Letters of Administration attached as **Exhibit 1**. Accordingly, Appellants request that Angela Embrey, Special Administrator for the Estate of Giann Bianchi, be substituted into this matter in the place and stead of decedent Giann Bianchi.

///

///

///

Dated this 13th day of June, 2023

**PANISH SHEA BOYLE RAVIPUDI
LLP**

/s/ Julia Armendariz

IAN SAMSON, ESQ.

Nevada Bar No. 15089

ADAM ELLIS, ESQ.

Nevada Bar No. 14514

JULIA ARMENDARIZ, ESQ.

Nevada Bar No. 15865

300 S. Fourth Street, Suite 710

Las Vegas, Nevada 89101

samson@psblaw.com

ellis@psblaw.com

jarmendariz@psbr.law

AND

ER INJURY ATTORNEYS

COREY ESCHWEILER, ESQ.

Nevada Bar No. 6635

4795 S. Durango Drive

Las Vegas, NV 89147

ceschweiler@erinjuryattorneys.com

Attorneys for Appellants

CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2023, I submitted the foregoing **MOTION TO SUBSTITUTE SPECIAL ADMINISTRATOR FOR APPELLANT GIANN BIANCHI** for filing via the Court's eFlex electronic filing system. Electronic notification will be sent to the following:

PYATT SILVESTRI

JAMES P.C. SILVESTRI, ESQ.

Nevada Bar No. 3603

ROBERT P. MOLINA, ESQ.

Nevada Bar No. 6422

701 Bridger Avenue, Suite 600

Las Vegas, Nevada 89101

JOEL D. HENRIOD

Nevada Bar No. 8492

3993 Howard Hughes Pkwy Suite 600

Las Vegas, Nevada 89169

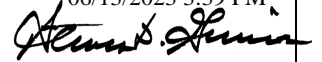
Attorneys for Respondent Susan

Clokey, Special Administrator for the

Estate of James McNamee

EXHIBIT 1

EXHIBIT 1


CLERK OF THE COURT

IAN SAMSON, ESQ.
Nevada Bar No. 15089
ADAM ELLIS, ESQ.
Nevada Bar No. 14514
JULIA ARMENDARIZ, ESQ.
Nevada Bar No. 15865
PANISH SHEA BOYLE RAVIPUDI LLP
300 South 4th Street, Suite 710
Las Vegas, Nevada 89101
Telephone: (702) 560-5520
Facsimile: (702) 975-2515
Email: *isamson@psbr.law*
aellis@psbr.law
jarmendariz@psbr.law

Attorneys for Petitioner

DISTRICT COURT
CLARK COUNTY, NEVADA

In the Matter of the Estate of:)	Case No. __P-22-114644-E__
GIANN BIANCHI,)	Dept. No. 26
)	
)	Probate
Deceased.)	

ORDER APPOINTING SPECIAL ADMINISTRATOR

THE COURT, having reviewed the Ex Parte Petition to Appoint Special Administrator and Notice of Hearing, and good cause appearing,

1. IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Angela Embrey be, and hereby is, appointed Special Administrator of the Estate of GIANN BIANCHI, without the necessity of posting bond.

2. IT IS FUTHER ORDERED, ADJUDGED, AND DECREED that Letters of Special Administration shall be issued to Angela Embrey upon her taking the oath.

1 3. IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that all of the
2 powers, authorities and duties of Special Administrator be conferred upon Petitioner including,
3 but not limited to, the authority to:

- 4 a. Commence, maintain, and execute any and all documentation necessary in
5 order to maintain and/or settle any negligence action;
6
7 b. Take charge of and care of the property of the Estate;
8
9 c. Ascertain the assets and protect the same in order to continue prosecuting a
10 liability claim which occurred prior to the decedent's death and is maintained as a
11 survival action under NRS 41.100(1).
12
13 d. Ascertain the full value of potential medical liens relating to the decedent's
14 medical treatment.

15 4. IT IS FURTHER ORDERED, ADJUDGED AND DECREED that all liquid
16 funds belonging to the Estate be placed in the **PANISH SHEA BOYLE RAVIPUDI LLC**
17 **CLIENT TRUST f/b/o BIANCHI ESTATE**, pending further Order of the Court.

18 DATED this ____ day of _____, 2023.

19
20 Dated this 13th day of June, 2023

21 _____
DISTRICT COURT JUDGE

22 261 8D2 FD43 6E43
23 Gloria Sturman
24 District Court Judge
25
26
27
28

1 Submitted by:
2 /s/ Julia Armendariz
3 IAN SAMSON, ESQ.
4 Nevada Bar No. 15089
5 ADAM ELLIS, ESQ.
6 Nevada Bar No. 14514
7 JULIA ARMENDARIZ, ESQ.
8 Nevada Bar No. 15865
9 **PANISH SHEA BOYLE RAVIPUDI LLP**
10 300 South 4th Street, Suite 710
11 Las Vegas, Nevada 89101
12 Telephone: (702) 560-5520
13 Facsimile: (702) 975-2515
14 Email: *isamson@psbr.law*
15 *aellis@psbr.law*
16 *jarmendariz@psbr.law*
17 *Attorneys for Petitioner*

1 **CSERV**

2
3 **DISTRICT COURT**
4 **CLARK COUNTY, NEVADA**

5
6 In the Matter of:

CASE NO: P-22-114644-E

7 Giann Bianchi, Deceased

DEPT. NO. Department 26

8
9 **AUTOMATED CERTIFICATE OF SERVICE**

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

13 Service Date: 6/13/2023

14 Isolde Parr

parr@psblaw.com

15 Adam Ellis

aellis@psbr.law

16 Julia Armendariz

armendariz@psblaw.com

17
18 If indicated below, a copy of the above mentioned filings were also served by mail
19 via United States Postal Service, postage prepaid, to the parties listed below at their last
20 known addresses on 6/14/2023

21 Ian Samson

Panish | Shea | Boyle | Ravipudi LLP

Attn: Ian Sampson

300 4th Street, Ste 710

22 Las Vegas, NV, 89101
23
24
25
26
27
28