

FILED

JUN 06 2022

IN THE SUPREME COURT OF THE STATE OF NEVADA

BY ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK

Apla Zorikgva
Appellant, Plaintiff

vs.

Julie Pyle
Respondent, Defendant

Supreme Court No. 84186

District Court No. A-20-821249-C

APPELLANT'S INFORMAL BRIEF

INSTRUCTIONS: If you are an appellant proceeding pro se (without an attorney) in the Nevada Supreme Court, you must file either (1) a brief that complies with Nevada Rule of Appellate Procedure (NRAP) 28(a), or (2) a completed copy of this informal brief form, see NRAP 28(k), with the Nevada Supreme Court on or before the due date, see NRAP 31. In civil appeals, if you do not file one of these documents by the due date, the Nevada Supreme Court may dismiss your appeal. In postconviction criminal appeals, if you do not file one of these documents by the due date, the Nevada Supreme Court or Nevada Court of Appeals may decide your appeal on the record without briefing.

HOW TO FILL OUT THIS FORM: This form must be typed, unless you are incarcerated, in which case it must be clearly handwritten. You do not need to refer to legal authority or the district court record. If you are completing your brief on this form, write only in the space allowed on the form. **Additional pages and attachments are not allowed.** If typing an informal brief, you may either use the lined paper contained in this form or an equivalent number of pages of your own paper. Your brief will be stricken if you fail to follow the directions in this form and the Nevada Rules of Appellate Procedure.

WHERE TO FILE THE BRIEF: You may submit your brief for filing in person or by mail.

To file your brief in person: Briefs may be submitted for filing Monday through Friday, 8:00 a.m. to 4:00 p.m.

Carson City: Bring the brief to the Clerk's Office at the Supreme Court of Nevada, 201 South Carson Street, Carson City, Nevada, 89701.

Las Vegas: Place your brief in the Clerk's Office Drop Box at the Las Vegas courthouse for the Nevada Appellate Courts, 408 East Clark Avenue, Las Vegas, Nevada, 89101.

Informal Brief Form October 2017
JUN 06 2022

22-17929

To file your brief by mail: Mail the brief to the Clerk of the Supreme Court of Nevada, 201 South Carson Street, Carson City, Nevada 89701. **Your brief must be postmarked on or before the due date.**

You must file the original brief and 1 copy with the clerk of the Nevada Supreme Court. If you want the clerk to return a file-stamped copy of your brief, you must file the original form and 2 copies and include a self-addressed, stamped envelope. Documents cannot be faxed or emailed to the Supreme Court Clerk's Office.

Copies of the brief must be mailed or delivered to the other parties to this appeal or to the parties' attorneys, if they have attorneys. You must also include a proper certificate of service or complete the certificate that is attached to the informal brief form.

CAUTION: Pro se parties are prohibited from representing other parties. A pro se party may not complete a brief on behalf of other parties. Pro se parties may collaborate on their briefs, however, provided that if one brief is submitted on behalf of multiple pro se parties, each party must sign and date the brief to confirm that he or she has participated in the preparation of the brief and, by his or her signature, joins in the arguments and representations contained therein.

Judgment or Order You Are Appealing. List the judgment or order that you are appealing from and the date that the judgment or order was filed in the district court.

Filed Date	Name of Judgment or Order
01/25/22	ERIC Johnson Notice of Entry
01/13/22	ERIC Johnson order

Notice of Appeal. Give the date you filed your notice of appeal in the district court: 02/04/2022

Related Cases. List all other court cases related to this case. Provide the case number, title of the case and name of the court where the case was filed.

Case No.	Case Title	Name of Court
83478	ZORIKOVA v Pyle	Nevada Supreme
83478-CAT	ZORIKOVA v Pyle	Nevada Court Supreme Court

Pro Bono Counsel. Would you be interested in having pro bono counsel assigned to represent you in this appeal?

☒ Yes ☐ No

NOTE: If the court determines that your case may be appropriate for having pro bono counsel assigned, an appropriate order will be entered. Assignment of pro bono counsel is not automatic.

Statement of Facts. Explain the facts of your case. (Your answer must be provided in the space allowed.)

I filed complaint based on the fact of my top German Shepherd dogs trained in personal protection with Top World Class Pedigrees and value over \$1,000,000 stolen on August 09-10 of 2020 from my private property by

Julie Pyle, other Defendants
in this case.

I filed police report w/ San Bernar-
dino Sheriff Department who inves-
tigated with homicide special in-
vestigation unit the stolen dogs
event for over the year.

Casey Gish by now is confirmed
person who stolen my dogs and had
them in his possession (Declaration
of Casey Gish attached); However,
Gish was Defendant in a different
case I filed in September of 2020
with Nevada Clark County District
Court (case # A-20-820761-C) which was
dismissed WITHOUT prejudice for failure
to post out of State Plaintiff's bond.

In Appealed here case # A-20-821249-C
There were NO Gish as Defendant, NO
Summon against upon Gish was neither
requested nor issued, NO service made
upon Gish, NO amended Complaint was filed
that would list Gish here as Defendant.
However, Gish "appeared" on Judgment
as Defendant in tiny letters, which is
against facts of this case. Furthermore,
Gish certified in his proof of service that

he is NOT a party of this case.
Furthermore, fees for Gish's attorney fees are NOT authorized by any statute and ~~are~~ grossly excessive. No evidence Gish presented that he ever received rate he claims. Gish stated ~~that~~ that he received donation in \$100,000 for this case already. Attorney Weir claimed her attorney fees without properly entering the case without notifying Appellant. Weir's fees are also excessive

Statement of District Court Error. Explain why you believe the district court was wrong. Also state what action you want the Nevada Supreme Court to take. (Your answer must be provided in the space allowed.)

Defendant filed Application for fees in October of 2021. None of statutes listed by Respondent/Defendant authorize attorney fees for this action. There were neither contractual agreement between Appellant and Respondents and each of them, nor any other statute that authorize attorney fees would be applicable in this case.

Further, There were no court's case nor other common law³ precedent applicable here that would authorize award of attorney fees to Defendant/Respondent.

Case, was never decided on merits and dismissal with prejudice is not authorized if not decided on merits. Respondent in his motion for attorney fees referred to statute 18.005, which is just a definition of "costs". 18.010 (referred again by Respondent) requires written agreement or allowance, which again, not the case here. There were no any agreement between Appellant and Respondent particularly regarding any attorney's fees. Further, Respondent refers, once again, inapplicable NRS 18.020 in which attorney fees awarded in cases related to real estate, which is NOT the case here. Further, Gish carelessly refers NRS 17.130 "Computation of Amount of Judgment", while Respondent is Defendant and no monetary judgment was entered in Defendant's favor. Lastly, Respon-

dent refers to NRSP 68 which is statute regarding execution of judgment.

Further, Respondent misapplies ALL the cases he attempts to cite, details of misapplication Appellant wrote in her "Plaintiff's objections To Defendant fees & costs" attached as Attachment 1 and listed on docket as filed on 10/19/21. paragraphs # 11, 12.

By this time Appellant was issued AZ "Certificate of Detention" (Attachment 2) in which under Penal Code of California 851.6-8 certified, that Plaintiff was NEVER arrested but detained only because NO charges have been filed by District Attorney, case was turned down in 2020 and closed. "Certificate of Detention" was provided to Gish and Weir multiple times, yet, they still propagating their false narratives, while it's Gish who allegedly fabricated and organized theft of Appellant's dogs in August of 2020.

In its Judgment (Attachment 2) on p.1 Judge Johnson listing Defendants Pyle, Willet, Vegas Shepherd Rescue ("Defendants")

By mistake, error & fraud- however,
in his judgment from Sept. 04/2021
appealed by Appellant in case # 83478
"Defendant Gish" appeared. No Defendant
Gish exists in A-21-821249-C case and there-
fore award of attorney fees, especially for
Gish as "Defendant" is improper. Court
erred in awarding any attorney fees
& costs. Awarded fees & costs were grossly
excessive. No any "false statements" was
stated by Appellant in Court and Court failed
to list any "false statement". Court misapplying
cases. Wherefore:

Appellant asks that award for Attorney's
fees and costs in favor of Respondent would
be reversed, Casey Gish would not be listed
as "Defendant" in this case and it's orders, judg-
ments

DATED this 02 day of June, 2022


Signature of Appellant

Alla Zorikova
Print Name of Appellant

CERTIFICATE OF SERVICE

I certify that on the date indicated below *I have served a copy*
of completed informal brief form upon all parties to the *appeal as follows:*

☐ By personally serving it upon him/her; or

☒ By mailing it by first-class mail with sufficient *mailing prepaid*
postage

the following address(es) (list names and addresses of parties served):

USPS Tracking # Priority Mail

*1125 Coral Rainbow Ave,
Las Vegas, NV, 89123*

*5940 S. Rainbow Blvd.,
Las Vegas, NV, 89118*

*2620 Regatta Dr.
Las Vegas, NV 89128*

DATED this *03* day of *June* *2022*

[Signature]
Signature

Alla Zorikova

Print Name

7101 N. Mesa, #332

Address

El Paso, TX 79912

City/State

323 209 5186

Telephone

Steve John 19732017@gmail.com