

Electronically Filed
Feb 14 2022 08:43 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court No. Feb
Eliza
District Court Case No. Cler
A-19-805351-C

VS.

Respondents.

Real Party in Interest.

and

**RULE 27(e) EMERGENCY MOTION FOR
INTERIM EXTENSION OF STAY
(Action Required by February 14, 2022)**

POINTS AND AUTHORITIES

I. INTRODUCTION

At a motion hearing on January 27, 2022, the district court granted in part, and denied in part Petitioners NationsBuilders Insurance Services, Inc. (“NBIS”) and NBIS Construction & Transport Insurance Services, Inc. (“CTIS”) motion for reconsideration of the order denying their renewed motion to stay proceedings, pending the outcome of the appeal in the underlying personal injury lawsuit. The district court declined to stay the entire case pending appeal, but granted a temporary 15 day stay of litigation, until February 14, 2022, to allow NBIS and CTIS to seek additional relief from the Nevada Supreme Court.

Because of that approaching deadline, Petitioners make two requests. First, under NRAP 8(a)(2)(A)(ii), NBIS and CTIS ask this Court to extend the district court’s stay through the course of these writ proceedings. An extension of the stay is appropriate under the NRAP 8(c) factors, particularly as denying the stay would defeat the object of this petition. Second, NBIS and CTIS request under NRAP 27(e) an interim extension of stay pending consideration of the full stay motion.

II. BACKGROUND

As set forth in their petition, NBIS and CTIS moved to stay the bad faith litigation initiated by Real Party in Interest Diane Sanchez pending the appeal of the order refusing to set aside the default judgment in the underlying personal injury

lawsuit. Existing federal case law supports a finding that a bad faith claim is not ripe until the appellate process is complete, as the outcome of the appeal could materially alter the insurance entities' purported liability in the bad faith action.

Moreover, allowing a bad faith action to proceed while the underlying judgment is subject to being set aside reverses the normal course and resolution of these cases, drives up the costs of litigation, and allows for the potential abuse and misuse of information and documents between the two cases. NBIS and CTIS have already experienced such abuse by Sanchez, who has already taken discovery she obtained in the bad faith action and used it to attempt to improperly influence the outcome of the appeal in the personal injury matter.

Despite these prejudices and abuses, the district court only granted the motion for reconsideration in part, staying litigation for 15 days, up to and including February 14, 2022, to allow NBIS and CTIS to seek further relief from this Court. NBIS and CTIS filed their petition on Friday, February 11, 2022. *See* Hr'g Tr. 01/27/22 at 12:24–13:21. Exhibit 1.

III. LEGAL ARGUMENT

A. Motion to Extend District Court Stay Pending Writ Petition.

The district court stayed the entire bad faith action for 15 days, up to and including February 14, 2022. *Id.* Extending the stay is the only way to preserve appellate review of the issue in the writ petition and to prevent an irreversible and

highly prejudicial abuse of documents disclosed by the defendants in the bad faith action. As all of the NRAP 8(c) factors continue to favor a stay, the extension of the district court's stay through this Court's resolution of the writ petition is warranted.

i. Denying a Stay Would Defeat the Object of the Petition and Allow Sanchez to Continue Misusing Disclosures in the Bad Faith Action to Improperly Influence the Personal Injury Action and Appeal.

“Given the interlocutory nature of [this] appeal [, . . .] the first stay factor takes on added significance.” *Mikohn Gaming Corp. v. McCrea*, 120 Nev. 248, 253, 89 P.3d 36, 38 (2004). If discovery in the underlying district court matter is not stayed pending decision of the writ, and pending decision of the underlying appeal, NBIS and CTIS will be forced to participate in time-consuming, costly, and likely unnecessary discovery process. It is highly prejudicial to require NBIS and CTIS to proceed with discovery while the writ is pending.

More importantly, Sanchez has already established that she is willing to take documents produced under a stipulated protective order in the bad faith action and submit them to the district court in the personal injury lawsuit in order to improperly influence the outcome of Bon's appeal¹. Without a stay, NBIS and CTIS have no shield (and no remedy) against this conduct. Additionally, allowing discovery to

¹ Amended stipulated protective order filed November 15, 2021, Paragraph 10-Confidential Information and Materials designated “CONFIDENTIAL” or “CONFIDENTIAL – ATTORNEYS’ EYES ONLY” shall be used solely for the prosecution or defense of this action.

proceed while the writ and appeal are pending would be against the general public policy of allowing cost-effective, fair discovery. The first factor therefore strongly weighs in favor of granting the stay requested.

ii. Denying a Stay Will Allow Sanchez to Continue Abusing Discovery Produced in the Bad Faith Action, Causing Petitioners Irreparable Harm.

Similarly, denying a stay of litigation would cause NBIS and CTIS irreparable harm. *See* NRAP 8(c)(2). If discovery in bad faith action is not stayed, Sanchez will be permitted to continue her efforts to obtain discovery in the bad faith action to try and improperly influence the outcome of Bon's appeal. Sanchez's conduct creates an obvious danger of irreparable harm to NBIS and CTIS, both of which have no choice but to participate in discovery in the absence of a stay, and conversely, cannot intervene in the personal injury action in which the appealed-from judgment was entered. *Nalder v. Eighth Judicial Dist. Court*, 136 Nev. 200, 203, 462 P.3d 677, 682 (2020).

Additionally, discovery is often the most expensive stage in litigation, and the discovery process in the bad faith action would be no different. In *Mikhon Gaming*, this Court ordered a stay of a lower court order denying arbitration even though the only harm threatened was increased litigation costs and delay. *Cf. Mikohn Gaming*, 120 Nev. at 253, 89 P.3d at 39. Ultimately, if discovery continues during the pendency of the writ, Petitioners will be forced to spend tens of thousands of dollars

in legal fees to conduct discovery in a case that may not even exist after this Court issues a decision on the underlying appeal.

And if the bad-faith action proceeds to judgment before a reversal of the underlying default judgment against Bon, petitioners are at risk of paying—and never recouping—payments on an invalid judgment to Sanchez.

Accordingly, these factors weigh in favor of a stay of discovery.

iii. A Stay Will Not Irreparably Harm the Real Party in Interest.

By contrast, a stay will cause no irreparable harm to the real party in interest. *See* NRAP 8(c)(3); *see also Mikohn Gaming*, 89 P.3d at 39. As discussed in Petitioners’ writ, Sanchez waited *nearly three years* after a default was entered against Mr. Bon in the underlying personal injury action before initiating the bad faith action in the first place.² In fact, Sanchez took no action to enforce the default until she had agreed to a dismissal of the entire action against all the parties and the district court, as a consequence, statistically closed the case. She cannot now claim that waiting for any bad-faith claim to ripen (and any assignment of that claim be validated) will be unduly prejudicial to her, literally years after both the accident and the inception of the personal injury lawsuit.

² As of the date of this Motion, more than *six years* have passed since Ms. Sanchez filed her personal injury action on August 7, 2015; more than two and a half years have passed since default judgment was entered against Mr. Bon on July 19, 2019.

iv. The Petition has Substantial Merit

In these circumstances, where a writ petition is the only way to protect against the irreparable harm caused by allowing the bad faith action to proceed while the underlying judgment is on appeal, only a showing that the petition is frivolous or sought solely for dilatory purposes will defeat a stay. *See State v. Robles-Nieves*, 129 Nev. 537, 539, 306 P.3d 399, 406 (2013); see also *Fritz Hansen A/S v. Eighth Judicial Dist. Court*, 116 Nev. 650, 659, 6 P.3d 982, 987 (2000) (quoting *Ruiz v. Estelle*, 650 F.2d 555, 565 (5th Cir. 1981)). Indeed, this Court has granted a stay even where “the merits [were] unclear.” *Mikohn Gaming*, 120 Nev. at 254, 89 P.3d at 40.

Here, Petitioners have shown that the district court’s ruling is likely to be reversed. Petitioners have demonstrated that Sanchez’s bad faith claim is not ripe until the appellate process is complete. *Branch Banking & Tr. Co. v. Nev. Title Co.*, No. 2:10-CV-1970 JCM (RJJ), 2011 U.S. Dist. LEXIS 40948, at *10 (D. Nev. Apr. 13, 2011) (“Plaintiff asserts a claim for bad faith ... However, this claim is not ripe until the appeal process is complete.”), citing *Barnes v. Allstate Ins. Co.*, No. 8:10-cv-2434-T-30MAP, 2010 U.S. Dist. LEXIS 138340, at *6-7 (M.D. Fla. Dec. 28, 2010) and *Premcor USA, Inc. v. Am. Home Assurance Co.*, 400 F.3d 523, 529 (7th Cir. 2005); see also *Semenza v. Nevada Medical Liability Ins. Co.*, 765 P.2d 184, 186, 104 Nev. 666, 668 (1988) (legal malpractice claim does not accrue when

appeal pending). Thus, at the very least, this case presents a “serious legal question” warranting a stay. *Fritz Hansen A/S*, 116 Nev. at 659, 6 P.3d at 987. Additionally, however, Petitioners have demonstrated that allowing the bad faith action to move forward has resulted in Sanchez abusing discovery produced in the bad faith action to improperly influence the outcome of the personal injury lawsuit and related appeal.

B. Rule 27(e) Emergency Motion for Interim Extension of Stay

Because the temporary stay of the bad faith action will be lifted in less than 14 days, on February 14, 2022, an interim extension of the lower court’s stay order is needed to avoid serious and imminent harm. *See* NRAP 27(e)(4). Petitioners and their counsel have worked diligently to prepare the petition and this motion for stay in within the deadlines set by the district court. Petitioners recognize, however, that this Court may want additional time to consider the request to extend the district court’s stay through the resolution of the writ petition. If so, this Court should at least stay the disclosure order while the Court considers that stay request. Absent this emergency relief, Petitioners would be forced to continue litigating the bad faith action, at the risk of making both the stay and the underlying petition moot.

III. CONCLUSION

Based on the foregoing, each of the four factors of NRAP 8(c) are satisfied, and Petitioners are entitled to a stay of discovery in the underlying bad faith action.

Accordingly, Petitioners respectfully request that their Emergency Motion for Interim Extension of Stay pursuant to NRAP 27(E) be granted.

Dated this 11th day of February, 2022.

LIPSON NEILSON P.C.

/s/ Megan H. Thongkham

By:

JOSEPH P. GARIN, ESQ.
Nevada Bar No. 6653
MEGAN H. THONGKHAM, ESQ.
Nevada Bar No. 12404
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
*Attorneys for Petitioners NationsBuilders
Insurance Services, Inc. and NBIS Construction
& Transport Services, Inc.*

NRAP 27(e) CERTIFICATE

A. Contact information

Dennis M. Prince, Esq.
Kevin T. Strong, Esq.
PRINCE LAW GROUP
10801 West Charleston Blvd., Suite 560
Las Vegas, NV 89135
eservice@thedplg.com
Attorneys for Respondent
Diane Sanchez

Robert E. Schumacher
Wing Yan Wong
GORDON REES SCULLY
MANSUKHANI, LLP
300 South 4th Street
Suite 1550
Las Vegas, Nevada 89101
Attorneys for
DMA Claims Management, Inc.

John H. Podesta
Christopher Phipps
WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER, LLP
6689 Las Vegas Boulevard South
Suite 200
Las Vegas, Nevada 89119
Attorneys for
Windhaven National Insurance
Company f/k/a ATX Premier Insurance
Company

B. Facts Showing Nature of Claimed Emergency

On January 27, 2022, the district court granted in part and denied in part Petitioner's Motion for Reconsideration of Order regarding its Renewed Motion to Stay Proceedings following oral argument. *Id.* The court's order was filed February 1, 2022, and notice of entry of order was filed the same day. *Ex. 2.* Petitioners filed their writ on Friday, February 11, 2022. Without an immediate extension of the stay

from this Court, Petitioners will be forced to participate in the bad faith action despite the fact that the judgment which gives rise to the bad faith claims may be set aside. Additionally, Petitioners will have no remedy against Sanchez's attempt to use documents produced in the bad faith action to influence the underlying personal injury lawsuit and appeal.

C. Notice and Service

On February 11, 2022, I contacted Prince Law Group and notified Mr. Strong of this motion to stay and emergency motion for interim extension of stay. My office e-mailed copies of the motion for stay and this certificate to each of the listed attorneys for real parties in interest.

Dated this 11th day of February, 2022.

LIPSON NEILSON P.C.

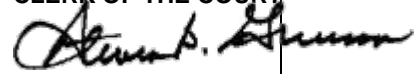
/s/ Megan H. Thongkham

By:

JOSEPH P. GARIN, ESQ.
Nevada Bar No. 6653
MEGAN H. THONGKHAM, ESQ.
Nevada Bar No. 12404
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
*Attorneys for Petitioners NationsBuilders
Insurance Services, Inc. and NBIS Construction
& Transport Services, Inc.*

EXHIBIT 1

EXHIBIT 1



TRAN

DISTRICT COURT
CLARK COUNTY, NEVADA

DIANE SANCHEZ,

Plaintiff,

vs.

ATX PREMIER INSURANCE
COMPANY,

Defendant.

CASE NO. A-19-805351-C

DEPT. XIII

BEFORE THE HONORABLE MARK R. DENTON,
DISTRICT COURT JUDGE

THURSDAY, JANUARY 27, 2022

TRANSCRIPT OF HEARING

**MOTION FOR RECONSIDERATION OF ORDER DENYING
NATIONSBUILDERS INSURANCE SERVICES, INC. AND NBIS
CONSTRUCTION & TRANSPORT INSURANCE SERVICES RENEWED
MOTION TO STAY PROCEEDINGS PURSUANT TO NRCP 60(B)(6), OR
ALTERNATIVELY, EDCR 2.24(B) ON AN ORDER SHORTENING TIME
PLAINTIFF DIANE SANCHEZ'S MOTION FOR COURT ORDER
DIRECTING DEFENDANTS NATIONSBUILDERS INSURANCE
SERVICES, INC. & NBIS CONSTRUCTION & TRANSPORT INSURANCE
SERVICES, INC. TO REDESIGNATE DOCUMENTS UNILATERALLY
DEEMED CONFIDENTIAL ON ORDER SHORTENING TIME**

SEE APPEARANCES ON PAGE 2

RECORDED BY: JENNIFER P. GEROLD, COURT RECORDER

TRANSCRIBED BY: MANGELSON TRANSCRIBING

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCES:

For the Plaintiff:

DENNIS M. PRINCE, ESQ.
KEVIN T. STRONG, ESQ.
Appearing Via Video

For the Defendant
DMA Claims Management:

JOHN F. SCHNERINGER, ESQ.
Appearing Via Video

NBIS Defendants:

MEGAN H. THONGKHAM, ESQ.
Appearing Via Video

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Las Vegas, Nevada, Thursday, January 27, 2022

[Case called at 10:17 a.m.]

THE COURT: Diane Sanchez versus ATX Premier Insurance Company.

MR. PRINCE: Good morning, Your Honor. Dennis Prince and Kevin Strong for Plaintiff.

MS. THONGKHAM: Good morning, Your Honor. Megan Thongkham on behalf of Defendants Nationsbuilders Insurance Services and NBIS Construction and Transport Insurance Services.

MR. SCHNERINGER: Good morning, Your Honor. John Schneringer on behalf of DMA Claims.

THE COURT: Good morning.

All right. I've got a couple motions on. One's a Motion for Reconsideration and Order Denying Nationsbuilders Insurance Services, Inc. and NBIS Construction and Transport Insurance Services Renewed Motion to Stay Proceedings Pursuant to NRCP 60(b)(6), or Alternatively EDCR 2.24(b).

And then I've got Plaintiff Diane Sanchez's Motion for Court Order Directing Defendants Nationsbuilders Insurance Services, Inc. & NBIS Construction & Transport Insurance Services, Inc. To De-Designate Documents Unilaterally Deemed Confidential. Okay.

Any consensus on the order in which I should hear these?

MS. THONGKHAM: Your Honor, the Motion for

1 Reconsideration should be heard first.

2 THE COURT: I'm hearing no objection to that. Go ahead.

3 MS. THONGKHAM: Thank you, Your Honor. This is -- I'm
4 going to refer to them as NBIS and CTIS, if you don't mind; they're
5 defendants.

6 We came before the Court on December 9th on
7 Defendant's Renewed Motion to Stay Proceedings and the big issue
8 that came up at that hearing was that in order to show cause, the
9 Supreme Court had issued, November 19th, in the appeal, pending
10 in the underlying personal injury action and whether that Order to
11 Show Cause would somehow affect the efficacy of the appeal or
12 result in the dismissal of the appeal.

13 And so based on that, Your Honor denied the renewed
14 motion without prejudice and essentially told Defendants, come
15 back when the dust settles, and we can revisit the Motion to Stay.
16 We're here today, hopefully to address your concerns, Your Honor,
17 and ask you to reconsider the order denying the Renewed Motion
18 because the order to show cause on which the Court based the
19 denial has zero impact on whether the appeal will move forward.

20 There are multiple orders on appeal in the underlying
21 action. The order that's most central, that's absolutely crucial to
22 this action is the order that refused to set aside the default
23 judgment. That order is moving forward no matter what. The OSC
24 that was issued in November, deals specifically with a potential
25 jurisdictional defect in the appeal from the judicial assignment; it

1 has nothing to do with the appeal from the order refusing to set
2 aside the default.

3 As long as that order is pending, it is absolutely
4 antithetical to principles of equity and fairness in opposition to
5 existing case law to allow the bad faith action to move forward
6 when the judgment that allegedly gives rise to the bad faith could
7 be set aside.

8 The prejudice to my clients, in particular, is extremely
9 widespread. It's not just the cost of discovery in this matter and the
10 time, although that has been immense, it's also the risk that a
11 judgment could be entered in this case when the underlying
12 judgment is not settled.

13 And unfortunately, Your Honor, we're seeing that the
14 Plaintiff is already using the discovery produced in this action to
15 attempt to influence the outcome of the underlying appeal, in
16 violation of the protective order, first of all, but also, this outcome is
17 precisely the opposite of the normal order resolution. In the
18 underlying action, the Plaintiff would never have access to the claim
19 file. They'd never be able to submit the insurance documents to the
20 District Court Judge, to attempt to influence how the appeal comes
21 out on the Order to Set Aside the Default Judgment.

22 So by entering a stay in this case, you not only save all of
23 the parties' time and money, you conserve judicial resources and
24 you protect the Defendants against the absolute abuse of their
25 documents in submission in the underlying action.

1 THE COURT: All right. Mr. Prince.

2 MR. PRINCE: Yes, Your Honor. Thank you.

3 This motion has been brought before you numerous times
4 and you've denied it each and every time.

5 I want to address two aspects of the request. One is -- just
6 let's talk about the order to show cause. I mean, the Court has
7 determined that there is a potential jurisdictional defect as it relates
8 to the judicial assignment order; that is true. But however, that
9 doesn't impact what you're doing here in this case, in this
10 enforcement proceeding.

11 The appeal will go forward as Ms. -- as Counsel indicates
12 on the issue of the valid -- the order denying the Motion to Set
13 Aside the Default Judgment; however, what we have is a valid final
14 judgment issued in Judge Delaney's Court that -- we also have a
15 valid judicial assignment of all of Mr. Bon's rights, the claimed
16 insured, which gives rise to Ms. Sanchez's ability to file this direct
17 action against NBIS, CTIS, and DMA, which is the other co-
18 defendant in this case, to enforce the default judgment.

19 Contrary to Counsel's arguments, this proceeding is not
20 antithetical to concepts of equity or other notions of justice. This
21 insurer and/or representative of an insurer, NBICTIS, Number 1,
22 they knew that Mr. Bon was an insurer, they knew there was a
23 lawsuit. They had notice of the lawsuit; those facts are undisputed.
24 They knew that Mr. Bon was served through the Department of
25 Motor Vehicles as appropriate substitute of services, as allowed

1 under Nevada law. With that in mind, they never provided a legal
2 defense to challenge the efficacy of the service. When they had
3 notice of the action and opportunity to defend, they chose to ignore
4 it.

5 Next, they actually spoke to Mr. Bon, explained the
6 lawsuit to him and even though they knew he was served through
7 the Department of Motor Vehicles, there was an attempt for a
8 substitute of service, they explained the lawsuit to him and then
9 again elected --

10 THE COURT: All right. I under --

11 MR. PRINCE: -- not to --

12 THE COURT: I understand all your --

13 MR. PRINCE: -- provide a legal defense --

14 THE COURT: -- contentions. What I'm focusing on here --

15 MR. PRINCE: And I guess the point is with that -- because
16 they're making an equitable argument and because they had an
17 opportunity to defend, elected not to defend prior to the entry of a
18 default judgment that they shouldn't be heard now when the
19 absence of appropriate security. They never moved for a stay in
20 Judge Delaney and sought Rule 62 relief by posting a bond.

21 Similarly, they shouldn't be able to circumvent that here
22 in your action and halt all enforcement proceedings. Ms. Sanchez's
23 only known asset right now is this insurance policy and the rights
24 flowing from that insurance policy and the briefs, the duties by
25 NBIS and CTIS. They -- she shouldn't be at risk now of -- with no

1 bond and no security or anything else and prevented from moving
2 forward against those two entities who made the decision not to
3 defend in the first place.

4 And I think -- I raise those arguments because I think it's
5 important to your analysis in terms of the equity. It's not as if you
6 had a carrier who said we didn't have notice of the accident, we
7 didn't have an opportunity to defend and we want to challenge
8 those issues. That's not what you have here. And so that's why I
9 highlight those facts because they come in here after already
10 breaching their obligations.

11 They don't have the right to equity, they don't have clean
12 hands, they don't have the sense of hey, there's a potential injustice
13 happening in the underlying tort case that we now need to get relief
14 from because no one knew the lawsuit was filed or there was an
15 effort of service or even a default or a default judgment. They knew
16 about all of those facts and so we have a valid and final de --
17 judgment that we're seeking to enforce here.

18 If the Court is inclined -- so we never really addressed the
19 merits of the -- and the substance of the stay arguments. We talked
20 kind of loosely about the appellate-related issues but quite frankly
21 those are irrelevant. They have the ability to get a stay, they have
22 elected not to post a bond. If they want to have a meaningful
23 opportunity to litigate the underlying appeal, go ahead. And if they
24 want a stay, then post a bond like any other Defendant would under
25 Rule 62. They've chosen not to do that.

1 But we're asking you here, Your Honor, because the
2 equities of the position, their refusal to post security and get a stay
3 in front of Judge Delaney, under Rule 62, that if you grant a stay
4 and post a security requirement so that the Plaintiff, Diane Sanchez
5 is not prejudiced by a two-year stay of this action against this entity.
6 We don't know what's going to happen in two years. Their
7 solvency, ability to recover, if they'd sell assets, what impact that's
8 going to have on Ms. Sanchez's rights to pursue this matter. And
9 that would be manifestly unfair to her in seeking the payment of
10 redress for her 15-plus million-dollar default judgment.

11 And so for those reasons, Your Honor, we don't believe
12 that under Rule 60(b)(6) that there's been any sufficient cause. They
13 need to present to you substantially different evidence; they have
14 not. It's the same arguments they've made over and over. They
15 haven't satisfied the Rule 60(b)(6) requirements.

16 Moreover, they can't satisfy the local rule because they
17 haven't demonstrated any good cause or stopping this enforcement
18 proceeding while they pursue an appeal that they could have
19 challenged a service early on. They could have avoided the default
20 judgment by simply appearing in the action; that -- they themselves
21 could have done that.

22 So this is not the entity that deserves a stay. There is no
23 equitable basis or legal basis for an entity who knows about a
24 lawsuit and elects not to defend. That was a voluntary choice they
25 made, and they shouldn't now benefit from their own decision-

1 making which results in a catastrophic default judgment entered
2 against their insured.

3 So for those reasons, Your Honor, we're requesting you
4 deny.

5 THE COURT: How do you respond to Counsel's statement
6 that the pending Order to Show Cause has nothing to do with the
7 judgment?

8 Did you hear me, Mr. Prince?

9 MR. PRINCE: I'm sorry?

10 THE COURT: How do you respond to what --

11 MR. PRINCE: I'm sorry --

12 THE COURT: How do you respond to what Counsel said
13 about the pending Order to Show Cause and the Supreme Court
14 having nothing to do with the judgment that's the subject of this?

15 MR. PRINCE: Oh I think I -- I'm sorry, Your Honor, I
16 thought -- I apologize. I thought I addressed that at the beginning. I
17 agreed with her that the Order to Show Cause related to the order
18 relating to judicial assignment and not the underlying judgment
19 itself.

20 THE COURT: Okay.

21 MR. PRINCE: I agreed with that.

22 THE COURT: What is your understanding relative to the
23 timeframe -- what do Supreme Court records show relative to when
24 it's going to be expected that a determination will be made in the
25 Supreme Court on the appeal?

1 MR. PRINCE: We -- oh, we have no indication. We
2 haven't even started the briefing on appeal. And from my
3 experience in dealing with intricate appellate matters over the
4 course of my career, you're looking at a probably almost 24
5 months -- by the time we brief it, decision, potential argument,
6 we're looking at probably close to two years from now.

7 THE COURT: Okay. All right. Thank you.
8 Counsel?

9 MS. THONGKHAM: Yes, Your Honor. A couple thoughts I
10 had. First of all, Mr. Prince referred to my clients as insurers; they
11 are not insurers. We've represented that many times in briefing but
12 just to make sure that record is clear.

13 And, you know, I think it's important to point out, we're
14 not asking this Court to, you know, overturn the judgment. We're
15 asking for a discretionary stay, pending the outcome of the appeal.
16 And there's lots --

17 THE COURT: Pending the outcome --

18 MS. THONGKHAM: -- of use --

19 THE COURT: -- of the appeal that will take maybe up to
20 two years or whatever; is that what I -- or a year?

21 MS. THONGKHAM: If that's what it takes, Your Honor.
22 But here's the other part, Your Honor, there's a lot of use of the
23 word they; they should have done this, they should have done that.
24 NBIS and CTIS are not Defendants in the underlying matter. The
25 judgment was not entered against them. There's no dispute that

1 Mr. Bon, you know, has very limited financial resources.

2 And to the extent that there's a discussion about a bond,
3 that shouldn't be here in the bad faith action, that should be in front
4 of Judge Delaney. We are not named Defendants in the underlying
5 case. And the way that this -- the two cases have run almost
6 simultaneously instead of finishing the personal injury action first
7 and the appeal and then proceeding to bad faith, my clients don't
8 even have a real opportunity to move to intervene.

9 We're post-judgment now. We're faced with fighting
10 violations of our protective order, the submission of documents to
11 the underlying court, in violation of our protective order. And we
12 can't even intervene because it's post-judgment. So the quagmire
13 of issues that are presented by the procedural status of these two
14 cases really can't be understated.

15 Mr. Prince made some representations about the impact
16 on his client. We've never seen any sort of financial affidavit from
17 Ms. Sanchez. We've never seen any information that would
18 indicate that she can't wait another two years in the interest of, you
19 know, ensuring that the Defendants are protected against the entry
20 of yet another judgment that could be subject to reversal.

21 THE COURT: All right. I don't know off the top of my
22 head whether or not an order granting or denying a stay would be
23 an appealable order. It certainly, I guess, could be the subject of a
24 writ petition, one way or the other. But here's what I'm going to do,
25 I will grant a temporary stay for a period of 15 days. Okay?

1 And let's see here, I'll have the matter come before me
2 again on February 14th at 9:00 a.m. In other words, I'll grant the
3 stay effective until February 14th, at 9:00 a.m., close of business.
4 That's a temporary stay that will give you an opportunity, Counsel,
5 to determine what you want to do relative to that ruling.

6 I'm not going to grant a full stay or a permanent stay, just
7 a temporary stay to that point. And in the meantime, you can
8 determine whether or not to seek relief from the Supreme Court,
9 either by way of appeal or writ. Okay?

10 And I'm also going to continue the hearing on the other
11 motion that's before the Court today, which is the De-Designation
12 of Documents to the same time; February 14th at 9:00 a.m. In other
13 words, the Stay --

14 MR. PRINCE: Your Honor, I guess --

15 THE COURT: The Stay is effective until the end of the day
16 of February 14th. I'm continuing for further proceedings on the
17 Motion for Reconsideration and the -- let's put it this way. I'm
18 denying the Motion for Reconsideration to the extent that it seeks a
19 stay pending the appeal, but I am granting it in part, to the extent
20 that it seeks a temporary stay so that further relief can be sought by
21 the moving party in the Supreme Court. Okay?

22 MR. PRINCE: Very good.

23 MS. THONGKHAM: Thank you.

24 MR. PRINCE: Thank you, Judge.

25 THE COURT: So what I need then is -- and I'll hear -- I'm

1 deferring -- I'm passing the motion regarding the de-designation to
2 the 14th as well. Okay?

3 MR. PRINCE: With respect to --

4 THE COURT: Actually, I don't need --

5 MR. PRINCE: -- them --

6 THE COURT: I don't need to -- I don't need to pass any
7 part of the Motion for Reconsideration to the 14th because I've
8 ruled on that motion; temporary stay. Okay?

9 But I'll -- on the 14th of February, I'll then take a look at
10 what the record is reflecting regarding whether or not the Supreme
11 Court issued a stay or not. Okay?

12 MR. PRINCE: At the request of the moving party, correct?
13 I mean, you're not putting that on the Plaintiff --

14 THE COURT: Oh, yes --

15 MR. PRINCE: -- to do that.

16 THE COURT: Oh, yes. I'm sorry. Yes, it's -- if the moving
17 party wants to seek further stay beyond the temporary stay that I've
18 issued, the moving party can proceed accordingly in the Supreme
19 Court, either by of appeal, if it's an appealable order, or by --

20 MR. PRINCE: Okay.

21 THE COURT: -- way of writ. But the point is, get that
22 order to me ASAP, Mr. Prince; the order on the ruling --

23 MR. PRINCE: Yeah, we'll do it --

24 THE COURT: -- I've just made.

25 MR. PRINCE: Yeah, we'll get that to you today.

1 THE COURT: Okay.
2 MR. PRINCE: Yep, no problem.
3 THE COURT: So then Counsel --
4 MR. PRINCE: Yep.
5 THE COURT: -- can have that --
6 MR. PRINCE: Thank you.
7 THE COURT: -- in hand and be able to seek relief. Okay?
8 MS. THONGKHAM: Thank you, Your Honor.
9 THE COURT: Thank you.
10 MR. PRINCE: Thank you.

11 [Hearing concluded at 10:34 a.m.]

12 * * * * *

13
14
15
16
17
18
19
20
21
22
23
24
25

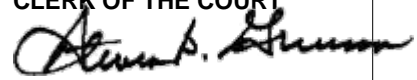
ATTEST: I do hereby certify that I have truly and correctly transcribed the audio/video proceedings in the above-entitled case to the best of my ability.



Brittany Mangelson
Independent Transcriber

EXHIBIT 2

EXHIBIT 2



LIPSON NEILSON P.C.
JOSEPH P. GARIN, ESQ.
Nevada Bar No. 6653
MEGAN H. THONGKHAM, ESQ
Nevada Bar No. 12404
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
Phone: (702) 382-1500
Fax: (702) 382-1512
jgarin@lipsonneilson.com
mthongkham@lipsonneilson.com

*Attorneys for Defendants,
NationsBuilders Insurance Services, Inc.,
NBIS Construction & Transport Insurance Services, Inc.*

**DISTRICT COURT
CLARK COUNTY, NEVADA**

DIANE SANCHEZ,

Plaintiff,

vs.

ATX PREMIER INSURANCE COMPANY
now known as WINDHAVEN NATIONAL
INSURANCE COMPANY, a foreign
corporation; NATIONSBUILDERS
INSURANCE SERVICES, INC., a foreign
corporation; NBIS CONSTRUCTION &
TRANSPORT INSURANCE SERVICES,
INC., a foreign corporation; DMA CLAIMS
MANAGEMENT, INC., a foreign
corporation; BLAS BON, an individual;
DOES I-X; and ROE CORPORATIONS I-X,
inclusive,

Defendants.

Case No: A-19-805351-C
Dept. No.: XIII

**NOTICE OF ENTRY OF ORDER
GRANTING IN PART AND DENYING
IN PART, MOTION FOR
RECONSIDERATION OF
DEFENDANTS NATIONSBUILDERS
INSURANCE SERVICES, INC. AND
NBIS CONSTRUCTION &
TRANSPORT SERVICES, INC.'S
RENEWED MOTION TO STAY
PROCEEDINGS PURSUANT TO
NRCP 60(B)(6), OR
ALTERNATIVELY, EDCR 2.24(B) ON
AN ORDER SHORTENING TIME**

TO: ALL PARTIES; and

TO: THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on the 1st day of February, 2022, an **ORDER
GRANTING IN PART AND DENYING IN PART, MOTION FOR RECONSIDERATION
OF DEFENDANTS NATIONSBUILDERS INSURANCE SERVICES, INC. AND NBIS**

1 **CONSTRUCTION & TRANSPORT SERVICES, INC.’S RENEWED MOTION TO STAY**
2 **PROCEEDINGS PURSUANT TO NRCP 60(B)(6), OR ALTERNATIVELY, EDCR**
3 **2.24(B) ON AN ORDER SHORTENING TIME**, was entered in the above-captioned
4 matter.

5 A copy of said Order is attached hereto and made part hereof.

6 Dated this 1st day of February, 2022.

7 LIPSON NEILSON P.C.

8 */s/ Megan H. Thongkham*

9 By:

10 Joseph P. Garin, Esq. (NV Bar No. 6653)
11 Megan H. Thongkham, Esq. (NV Bar No. 12404)
12 9900 Covington Cross Drive, Suite 120
13 Las Vegas, Nevada 89144

14 *Attorneys for Defendants,*
15 *NationsBuilders Insurance Services, Inc.,*
16 *NBIS Construction & Transport Insurance Services, Inc.*
17
18
19
20
21
22
23
24
25
26
27
28

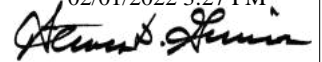
CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b) and Administrative Order 14-2, I certify that on the 1st day of February, 2022, I electronically served the foregoing **NOTICE OF ENTRY OF ORDER GRANTING IN PART AND DENYING IN PART, MOTION FOR RECONSIDERATION OF DEFENDANTS NATIONSBUILDERS INSURANCE SERVICES, INC. AND NBIS CONSTRUCTION & TRANSPORT SERVICES, INC.'S RENEWED MOTION TO STAY PROCEEDINGS PURSUANT TO NRCP 60(B)(6), OR ALTERNATIVELY, EDCR 2.24(B) ON AN ORDER SHORTENING TIME** to the following parties utilizing the Court's E-File/ServeNV System:

Dennis M. Prince, Esq. Kevin T. Strong, Esq. PRINCE LAW GROUP 10801 West Charleston Blvd., Suite 560 Las Vegas, NV 89135 eservice@thedplg.com <i>Attorneys for Plaintiff,</i> <i>Diane Sanchez</i>	John H. Podesta, Esq. Chris Richardson, Esq. WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP 525 Market Street, 17th Floor San Francisco, CA 94105-2725 John.Podesta@wilsonelser.com Chris.Richardson@wilsonelser.com <i>Attorneys for Defendants</i> <i>Windhaven National Insurance Company,</i> <i>Windhaven National Insurance Company</i> <i>fka ATX Premier Insurance</i>
Robert E. Schumacher, Esq. Wing Yan Wong, Esq. GORDON REES SCULLY MANSUKHANI, LLP 300 South 4 th Street, Suite 1550 Las Vegas, Nevada 89101 rschumacher@grsm.com wwong@grsm.com <i>Attorneys for Defendant,</i> <i>DMA CLAIMS MANAGEMENT, INC.,</i> <i>erroneously sued as DMA CLAIMS INC.</i>	

/s/ Debra Marquez

An Employee of LIPSON NEILSON P.C.


CLERK OF THE COURT

ORDR

LIPSON NEILSON P.C.
JOSEPH P. GARIN, ESQ.
Nevada Bar No. 6653
MEGAN H. THONGKHAM, ESQ
Nevada Bar No. 12404
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
Phone: (702) 382-1500
Fax: (702) 382-1512
jgarin@lipsonneilson.com
mthongkham@lipsonneilson.com

*Attorneys for Defendants,
NationsBuilders Insurance Services, Inc. and
NBIS Construction & Transport Insurance Services, Inc.*

DISTRICT COURT

CLARK COUNTY, NEVADA

DIANE SANCHEZ,

Plaintiff,

vs.

ATX PREMIER INSURANCE COMPANY
now known as WINDHAVEN NATIONAL
INSURANCE COMPANY, a foreign
corporation; NATIONSBUILDERS
INSURANCE SERVICES, INC., a foreign
corporation; NBIS CONSTRUCTION &
TRANSPORT INSURANCE SERVICES,
INC., a foreign corporation; DMA CLAIMS
MANAGEMENT, INC., a foreign
corporation; BLAS BON, an individual;
DOES I-X; and ROE CORPORATIONS I-X,
inclusive,

Defendants.

Case No: A-19-805351-C

Dept. No.: XIII

**ORDER GRANTING IN PART AND
DENYING IN PART, MOTION FOR
RECONSIDERATION OF
DEFENDANTS NATIONSBUILDERS
INSURANCE SERVICES, INC. AND
NBIS CONSTRUCTION &
TRANSPORT SERVICES, INC.'S
RENEWED MOTION TO STAY
PROCEEDINGS PURSUANT TO
NRCP 60(B)(6), OR ALTERNATIVELY,
EDCR 2.24(B) ON AN ORDER
SHORTENING TIME**

On January 27, 2022, Defendants Nationsbuilders Insurance Services, Inc.
("NBIS") and NBIS Construction & Transport Services, Inc.'s (CTIS") Motion for
Reconsideration of the Order Denying NBIS and CTIS' Motion to Stay Proceedings
Pursuant to NRCP 60(b)(6), or alternatively, EDCR 2.24(b), on an Order Shortening

Time, was brought for hearing before the Honorable Judge Mark R. Denton. Dennis Prince of PRINCE LAW GROUP, appearing on behalf of Plaintiff Diane Sanchez; Megan H. Thongkham of LIPSON NEILSON P.C., appearing on behalf of NBIS and CTIS; and John Schneringer of GORDON REES SCULLY MANSUKHANI, LLP, appearing on behalf of Defendant DMA Claims Management, Inc. The Court, having reviewed the pleadings and papers on file herein, having heard oral argument, and for good cause appearing therefor:

ORDER

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that NBIS and CTIS' Motion for Reconsideration of the Order Denying NBIS and CTIS' Renewed Motion to Stay Proceedings Pursuant to NRCP 60(b)(6), or alternatively, EDCR 2.24(b), on an Order Shortening Time is **GRANTED IN PART**, and **DENIED IN PART**, as follows:

1. The action shall be temporarily stayed from Thursday, January 27, 2022, through Monday, February 14, 2022.

///

///

///

///

///

///

///

///

///

///

///

///

Dated this 1st day of February, 2022



F88 0F4 64EE 48A4
Mark R. Denton
District Court Judge

ABG

DIANE SANCHEZ v. ATX PREMIER INSURANCE COMPANY
Case No: A-19-805351-C

2. The Court's entry of a temporary stay allows Defendants NBIS and CTIS to seek any further stay relief from the Nevada Supreme Court.

IT IS SO ORDERED.

Dated this 28th day of January, 2022.

Respectfully Submitted by:

/s/ Megan H. Thongkham

JOSEPH P. GARIN
Nevada Bar No. 6653
MEGAN H. THONGKHAM
Nevada Bar No. 12404
9900 Covington Cross Drive
Suite 120
Las Vegas, Nevada 89144
Attorneys for NBIS and CTIS

Dated this 28th day of January, 2022.

Approved as to Form and Content:

/s/ Refused to sign

DENNIS M. PRINCE
Nevada Bar No. 5092
KEVIN T. STRONG
Nevada Bar No. 12107
10801 West Charleston Boulevard
Suite 560
Las Vegas, Nevada 89135
Attorneys for Plaintiff Diane Sanchez

Dated this 28th day of January, 2022.

Approved as to Form and Content:

/s/ John F. Schneringer

ROBERT E. SCHUMACHER
Nevada Bar No. 7504
JOHN F. SCHNERINGER
Nevada Bar No. 14268
300 South 4th Street
Suite 1550
Las Vegas, Nevada 89101
Attorneys for DMA Claims Management, Inc.

From: John Schneringer <jschneringer@grsm.com>
Sent: Friday, January 28, 2022 8:21 AM
To: Megan Thongkham
Cc: Debra Marquez
Subject: RE: Sanchez v. NBIS, et al. - Proposed Order Granting, in part and Denying, in part, NBIS and CTIS's Motion for Reconsideration

Follow Up Flag: Follow up
Flag Status: Completed

Confirmed, thanks Megan.

JOHN F. SCHNERINGER | Associate

GORDON REES SCULLY MANSUKHANI
YOUR 50 STATE PARTNER®

300 South Fourth Street, Suite 1550
Las Vegas, NV 89101
D: 702-577-9302 | jschneringer@grsm.com

www.grsm.com
[vCard](#)

From: Megan Thongkham <MThongkham@lipsonneilson.com>
Sent: Thursday, January 27, 2022 10:52 PM
To: John Schneringer <jschneringer@grsm.com>
Cc: Debra Marquez <DMarquez@lipsonneilson.com>; Megan Thongkham <MThongkham@lipsonneilson.com>
Subject: FW: Sanchez v. NBIS, et al. - Proposed Order Granting, in part and Denying, in part, NBIS and CTIS's Motion for Reconsideration

Hi John,

Please confirm that we may submit with your electronic signature.

Thanks,

Please note my new email address: mthongkham@lipsonneilson.com



Megan H. Thongkham, Esq.
Lipson Neilson P.C.
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144-7052
(702) 382-1500
(702) 382-1512 (fax)

E-Mail: mhummel@lipsonneilson.com

Website: www.lipsonneilson.com [lipsonneilson.com]

OFFICES IN NEVADA, MICHIGAN, ARIZONA & COLORADO

CONFIDENTIALITY NOTICE

This message is confidential, intended only for the named recipient(s) and may contain information that is privileged, attorney work product or exempt from disclosure under applicable law. If you are not the intended recipient(s), you are notified that any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on the contents of this information is prohibited and may be unlawful. If you receive this message in error, or are not the named recipient(s), please notify the sender, delete this e-mail from your computer, and destroy any copies in any form immediately. Receipt by anyone other than the named recipient(s) is not a waiver of any attorney-client, work product, or other applicable privilege.

From: Kevin Strong <kstrong@thedplg.com>

Sent: Thursday, January 27, 2022 5:04 PM

To: Megan Thongkham <MThongkham@lipsonneilson.com>; John Schneringer <jschneringer@grsm.com>

Cc: Dennis Prince <dprince@thedplg.com>; Andrew Brown <abrown@thedplg.com>; Amy Ebinger <aebinger@thedplg.com>

Subject: RE: Sanchez v. NBIS, et al. - Proposed Order Granting, in part and Denying, in part, NBIS and CTIS's Motion for Reconsideration

Dear Megan:

Thank you for your prompt response. We will submit our proposed order and advise that a competing order will be submitted. Thanks.

Sincerely,

Kevin



Kevin T. Strong | Attorney

PRINCE LAW GROUP

10801 West Charleston Boulevard, Suite 560

Las Vegas, Nevada 89135

P: 702.534.7600 | F: 702.534-7601

kstrong@thedplg.com | www.thedplg.com

From: Megan Thongkham <MThongkham@lipsonneilson.com>

Sent: Thursday, January 27, 2022 5:00 PM

To: Kevin Strong <kstrong@thedplg.com>; John Schneringer <jschneringer@grsm.com>

Cc: Dennis Prince <dprince@thedplg.com>; Andrew Brown <abrown@thedplg.com>; Amy Ebinger <aebinger@thedplg.com>

Subject: RE: Sanchez v. NBIS, et al. - Proposed Order Granting, in part and Denying, in part, NBIS and CTIS's Motion for Reconsideration

Hi Kevin,

I agree with John that Judge Denton stayed the entire case through February 14.

Thanks,

Please note my new email address: mthongkham@lipsonneilson.com



Megan H. Thongkham, Esq.
Lipson Neilson P.C.
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144-7052
(702) 382-1500
(702) 382-1512 (fax)
E-Mail: mthongkham@lipsonneilson.com
Website: www.lipsonneilson.com

OFFICES IN NEVADA, MICHIGAN, ARIZONA & COLORADO

CONFIDENTIALITY NOTICE

This message is confidential, intended only for the named recipient(s) and may contain information that is privileged, attorney work product or exempt from disclosure under applicable law. If you are not the intended recipient(s), you are notified that any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on the contents of this information is prohibited and may be unlawful. If you receive this message in error, or are not the named recipient(s), please notify the sender, delete this e-mail from your computer, and destroy any copies in any form immediately. Receipt by anyone other than the named recipient(s) is not a waiver of any attorney-client, work product, or other applicable privilege.

From: Kevin Strong <kstrong@thedplg.com>

Sent: Thursday, January 27, 2022 4:57 PM

To: John Schneringer <jschneringer@grsm.com>; Megan Thongkham <MThongkham@lipsonneilson.com>

Cc: Dennis Prince <dprince@thedplg.com>; Andrew Brown <abrown@thedplg.com>; Amy Ebinger <aebinger@thedplg.com>

Subject: RE: Sanchez v. NBIS, et al. - Proposed Order Granting, in part and Denying, in part, NBIS and CTIS's Motion for Reconsideration

John,

We equally disagree with your interpretation of Jude Denton's ruling. We will await Megan's input and submit competing orders.

Sincerely,

Kevin



Kevin T. Strong | Attorney

PRINCE LAW GROUP

10801 West Charleston Boulevard, Suite 560

Las Vegas, Nevada 89135

P: 702.534.7600 | F: 702.534-7601

kstrong@thedplg.com | www.thedplg.com

From: John Schneringer <jschneringer@grsm.com>

Sent: Thursday, January 27, 2022 4:47 PM

To: Kevin Strong <kstrong@thedplg.com>; Megan Thongkham <MThongkham@lipsonneilson.com>

Cc: Dennis Prince <dprince@thedplg.com>; Andrew Brown <abrown@thedplg.com>; Amy Ebinger <aebinger@thedplg.com>

Subject: RE: Sanchez v. NBIS, et al. - Proposed Order Granting, in part and Denying, in part, NBIS and CTIS's Motion for Reconsideration

Hello Kevin,

As we discussed previously, I disagree with your characterization of Judge Denton's ruling. Please find attached proposed redlines which I believe more accurately reflect Judge Denton's ruling.

JOHN F. SCHNERINGER | Associate

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE PARTNER®

300 South Fourth Street, Suite 1550

Las Vegas, NV 89101

D: 702-577-9302 | jschneringer@grsm.com

www.grsm.com

[vCard](#)

From: Kevin Strong <kstrong@thedplg.com>

Sent: Thursday, January 27, 2022 4:04 PM

To: Megan Thongkham <MThongkham@lipsonneilson.com>; John Schneringer <jschneringer@grsm.com>

Cc: Dennis Prince <dprince@thedplg.com>; Andrew Brown <abrown@thedplg.com>; Amy Ebinger <aebinger@thedplg.com>

Subject: Sanchez v. NBIS, et al. - Proposed Order Granting, in part and Denying, in part, NBIS and CTIS's Motion for Reconsideration

Counsel,

Attached, please find our proposed order regarding NBIS and CTIS's Motion for Reconsideration for your review. Please provide any proposed revisions. If you have no proposed revisions, please confirm that we may affix your e-signature. Thanks.

Sincerely,

Kevin



Kevin T. Strong | Attorney

PRINCE LAW GROUP

10801 West Charleston Boulevard, Suite 560

Las Vegas, Nevada 89135

P: 702.534.7600 | F: 702.534-7601

kstrong@thedplg.com | www.thedplg.com

This email communication may contain CONFIDENTIAL INFORMATION WHICH ALSO MAY BE LEGALLY PRIVILEGED and is intended only for the use of the intended recipients identified above. If you are not the intended recipient of this communication, you are hereby notified that any unauthorized review, use, dissemination, distribution, downloading, or copying of this communication is strictly prohibited. If you are not the intended recipient and have received this communication in error, please immediately notify us by reply email, delete the communication and destroy all copies.

GORDON REES SCULLY MANSUKHANI, LLP

YOUR 50 STATE PARTNER[®]

<http://www.grsm.com>

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

4
5
6 Diane Sanchez, Plaintiff(s)

CASE NO: A-19-805351-C

7 vs.

DEPT. NO. Department 13

8 ATX Premier Insurance
9 Company, Defendant(s)

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 2/1/2022

15 Kimberly Glad

kglad@lipsonneilson.com

16 Debra Marquez

dmarquez@lipsonneilson.com

17 Brenda Correa

bcorrea@lipsonneilson.com

18 Efile LasVegas

efilelasvegas@wilsonelser.com

19 Sean Owens

sowens@grsm.com

20 Andrea Montero

amontero@grsm.com

21 John Podesta

john.podesta@wilsonelser.com

22 Joseph Garin

JGarin@lipsonneilson.com

23 Cristina Pagaduan

cpagaduan@grsm.com

24 Wing Wong

wwong@grsm.com

25 Chris Richardson

chris.richardson@wilsonelser.com

26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Robert Schumacher	rschumacher@grsm.com
Eservice Filing	eservice@thedplg.com
E-serve GRSM	WL_LVSupport@grsm.com
Megan Thongkham	mthongkham@lipsonneilson.com
Kaitlyn Brooks	Kaitlyn.Brooks@wilsonelser.com
Rachel Sodupe	rsodupe@thedplg.com
John Schneringer	jschneringer@grsm.com
Nicole Littlejohn	nlittlejohn@thedplg.com
Andrew Brown	abrown@thedplg.com