In The Supreme Court of the State of Nevada

NATIONSBUILDERS INSURANCE SERVICES INC., a foreign corporation; NBIS CONSTRUCTION & TRANSPORT INSURANCE SERVICES, INC., a foreign corporation;	Supreme Court Case No. 84227 District Court Case No. A-19-80535 Electronically Filed Apr 05 2022 05:36 p.m. Elizabeth A. Brown Clerk of Supreme Court
Petitioners,	
vs. THE EIGHTH JUDICIAL DISTRICT COURT of the State of Nevada, in and for the County of Clark; and THE HONORABLE MARK R. DENTON, District Judge;	
Respondents.	
DIANE SANCHEZ, an individual;	
Real Party in Interest.	

REAL PARTY IN INTEREST DIANE SANCHEZ'S ERRATA TO ANSWER TO PETITION FOR WRIT OF MANDAMUS, OR ALTERNATIVELY, PROHIBITION

Real Party in Interest Diane Sanchez ("Sanchez"), by and through her

counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW

GROUP, respectfully submits her Errata to Answer to Petition for Writ of

Mandamus, or Alternatively, Prohibition.

1. The case styled as *Lopez v. Merit Ins. Co.*, 109 Nev. 553, 853 P.2d 1266 (1993), referenced on page 26 of Sanchez's Answer to Petition for Writ of Mandamus, or Alternatively, Prohibition, should be included on page vi of the Table of Authorities, below *Lockyer v. Mirant Corp.*, 398 F.3d 1098 (9th Cir. 2005).

2. On page 10 of Sanchez's Answer to Petition for Writ of Mandamus, or Alternatively, Prohibition, lines 7-8 should read: "DMA classifies Blanco as Petitioners' direct employee who was involved in the handling of Sanchez's bodily injury claim."

3. On page 14 of Sanchez's Answer to Petition for Writ of Mandamus, or Alternatively, Prohibition, lines 11-12 should read, in part: "Now that Sanchez seeks to enforce her default judgment by stepping into Bon's shoes"

4. On page 20 of Sanchez's Answer to Petition for Writ of Mandamus, or Alternatively, Prohibition, lines 12-14 should read, in part: "Petitioners wish to control the timeframe in which they may be pursued for causing damages as a direct result of their contractual breach of the duty to defend. Not only is this outcome unfair to Bon as the innocent insured"

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5. On page 35 of Sanchez's Answer to Petition for Writ of Mandamus, or Alternatively, Prohibition, line 10 should read, in part: "discredits any suggestion that Petitioners are not using Bon to defend themselves in the personal injury action."

Based on this Errata, Sanchez's brief contains 6,972 words, which is still compliant with the type-volume limitation pursuant to NRAP 21(d).

DATED this 5th day of April, 2022.

Respectfully Submitted,

<u>/s/Kevin T. Strong</u> DENNIS M. PRINCE Nevada Bar No. 5092 KEVIN T. STRONG Nevada Bar No. 12107 **PRINCE LAW GROUP** 10801 W. Charleston Boulevard Suite 560 Las Vegas, Nevada 89135 Tel: (702) 534-7600 Fax: (702) 534-7601 Attorneys for Real Party in Interest *Diane Sanchez*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this document was filed electronically with the Supreme Court of Nevada on the <u>5th</u> day of April, 2022. Electronic service of the foregoing document entitled <u>REAL PARTY IN INTEREST</u>

DIANE SANCHEZ'S ERRATA TO ANSWER TO PETITION FOR

WRIT OF MANDAMUS, OR ALTERNATIVELY, PROHIBITION shall

be made in accordance with the Master Service List and the Court's eFlex

electronic filing system to the following:

Joseph P. Garin Megan H. Thongkham LIPSON NEILSON P.C. 9900 Covington Cross Drive Suite 120 Las Vegas, Nevada 89144 Attorneys for Petitioners NationsBuilders Insurance Services, Inc. and NBIS Construction & Transport Insurance Services, Inc.

> <u>/s/ Kevin T. Strong</u> An Employee of PRINCE LAW GROUP