

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

ROCHELLE MEZZANO

Petitioner,

vs.

THE SECOND JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, In and For the County of
Washoe, and the Honorable BRIDGET
ROBB and Honorable CYNTHIA LU

Respondent.

And

JOHN TOWNLEY

Real Party in Interest

Electronically Filed
Mar 16 2022 02:49 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

District Court Case No. DV19-01564

**PETITIONER'S REQUEST TO STAY PROCEEDINGS PENDING
DECISION ON PETITION FOR WRIT RELIEF IN THE COURT OF
APPEALS**

THE O'MARA LAW FIRM, P.C.
DAVID C. O'Mara, Esq.
Nevada Bar No. 8599
311 East Liberty Street
Reno, NV 89501
Telephone: 775/323-1321
Facsimile: 775/323-4082
Attorneys for Petitioner

Petitioner, Rochelle Mezzano (“Ms. Mezzano”), by and through her counsel, David C. O’Mara, Esq., of The O’Mara Law Firm, P.C. hereby requests that the underlying action, currently being litigated in the Second Judicial District Court, entitled *Townley v. Mezzano*, Case No. DV19-01564, be stayed pending a decision by the Nevada Court of Appeals in connection with Petitioner’s request that the Court of Appeals issue a writ of mandamus, or in the alternative, writ of prohibition, directing the Second Judicial District Court to reassign the underlying action back to Judge Lu as the peremptory challenge was timely.

This request is based on NRAP 8(a), the following Memorandum of Points and Authorities, the attached exhibits and any other evidence this Court may wish to consider.

MEMORANDUM OF POINTS OF AUTHORITIES

I. Background

In September 2019, John Townley (“Mr. Townley”) filed a complaint seeking a divorce from Rochelle Mezzano. Mr. Townley exercised his right to challenge one of the judges and the matter was re-assigned to a different judicial department.

On December 11, 2019, the court granted Mr. Townley's application for default judgment, after which the district court entered a default divorce decree. On January 4, 2020, Mr. Townley's counsel received a letter from an attorney stating that he represented Ms. Mezzano and intended to move to set aside the default

judgment and asking if Townley would stipulate thereto. Mr. Townley rejected the offer to stipulate and thus forced Ms. Mezzano to file a motion to set aside the default judgment.

The district court denied the motion to set aside the default judgement. Ms. Mezzano appealed, and the Supreme Court reversed and remanded the case back to the “district court for proceedings consistent with this order.” *See Mezzano v. Townley*, 497 P.3d 624 (2021). The Nevada Supreme Court found that the “district court abused its discretion by denying Mezzano’s motion because the judgment was void for lack of service. *Id.*

On December 2, 2021, the Nevada Supreme Court issued its Remittitur. However, prior to issuing the Remittitur, Mr. Townley filed a second Divorce/Annulment action against Ms. Mezzano entitled *Townley v. Mezzano*, DV21-015640, which involved the same parties and controversy.

On December 22, 2021, undersigned counsel appeared in the 2019 divorce action. The peremptory challenge to Judge Robb was filed on December 28, 2021. Shortly thereafter, Mr. Townley filed an *ex parte* request for status hearing. *See* Exhibit 1. Specifically, Mr. Townley sought an in-person hearing in order to determine “the procedural posture of this matter and the precedence of this case (or

lack thereof) over the 2021 action, case DV21-01640¹, involving the same parties and controversy.” Mr. Townley also filed an objection to the peremptory challenge on December 28, 2021.

On January 3, 2021, the DV19-01564 case was reassigned to Judge Lu. Thereafter, on January 5, 2021, Judge Lu issued an order striking the peremptory challenge.

On January 18, 2022, Judge Robb issued an order granting the status hearing to address the procedural issues related to this case moving forward. *See* Exhibit 2. The Writ Petition was filed on February 14, 2022.

Notwithstanding that the fact that the Court has set a status hearing for April 6, 2022, Mr. Townley has decided not to wait, and instead, has decided to file frivolous and unwarranted motions that either baseless and/or moot because counsel has made an appearance in the case. Mr. Townley has filed a motion for summary judgement to determine if the district court has personal jurisdiction over Ms. Mezzano, and then a motion to extend the time to serve the summons and complaint. These motions are frivolous and unwarranted because undersigned counsel made an appearance in December of 2021. However, the abusive litigation tactics continue as Ms. Mezzano sought to obtain a stipulation to stay the

¹ Mr. Townley also sought to consolidate the DV21-01640 case with the DV19-01564 case. Mr. Townley filed a motion for consolidation; however, he has taken no action since. Judge Lu recently quashed service of the summons and complaint because service was not proper.

district court matter pending the determination of the Writ Petition. *See* Exhibit 3. Mr. Townley would not agree to a stay and instead, has threatened to default Ms. Mezzano if she does not file her responsive pleading by March 18, 2021. *See* Exhibits 4 and 5.²

At this time, the district court has not conducted the necessary proceeding to be consistent and compliant with the Nevada Supreme Court's decision in *Mezzano v. Townley*, 487 P.3d 624 (2021). Indeed, while the Supreme Court specifically ruled that the default judgment is void, the district court still needs to set aside the default judgment, and subsequent orders, before the case can resume from the beginning.

Instead, Mr. Townley wants to increase the costs of litigation and waste the Court's time and judicial resources by making improper demands, especially since it is likely that Judge Robb will be removed, and a new judge will need to conduct the necessary proceedings to set aside the void judgement and orders before starting the litigation in DV19-01564.

Before the litigation in the district court can move forward, the Court of Appeals needs to decide this Writ Petition and then the district court will need to set aside the default judgment and subsequent orders. As such, and based upon the

² Agreeing that no order will take effect until after the Court of Appeals disposes of the Writ, continues his wasteful litigation strategy since any order Judge Robb while the Writ is pending, will be rendered void.

factors below, the Court of Appeals should issue a stay of the DV19-01564 case until a decision on the Writ Petition is made. A stay would conserve not only the parties' resources, but also judicial time and resources.

II. Legal Discussion

The action in the district court should be stayed pending a determination from the Court of Appeals on Petitioner's Petition for Writ Relief. NRAP 8 applies with equal force to writ petitions and to direct appeals. *See Hansen v. Eighth Judicial Dist. Court ex rel. County of Clark*, 116 Nev. 650, 657, 6 P.3d 982 986 (2000). NRAP 8 (a) allows for the Court of Appeals to enter a stay pending a request for writ relief if moving first in the district court would be impracticable. NRAP(a)(2)(A)(i). In deciding whether to issue a stay, the following factors must be considered (1) whether the object of the writ petition will be defeated if the stay is denied; (2) whether the petitioner will suffer irreparable or serious injury if the stay is denied; (3) whether the real party in interest will suffer irreparable or serious injury if the stay is granted; and (4) whether the petitioner is likely to prevail on the merits in the appeal or writ petition. NRAP 8(c); *Kress v. Corey*, 65 Nev. 1, 189 P.3d 352 (1948).

I. Seeking a stay in the district court would be impractical.

Ms. Mezzano has filed a writ of mandamus challenging the Honorable Cynthia Lu's decision to transfer the matter known as case *Townley v. Mezzano*,

DV19-01564, to the Honorable Bridget Robb, after Ms. Mezzano filed a timely peremptory challenge. Petitioner is requesting that Writ of Mandamus direct Judge Robb immediately transfer the case, *Townley v. Mezzano*, DV19-01564 back to the Honorable Cynthia Lu. Additionally, Petitioner seeks a writ of prohibition arresting the *Townley v. Mezzano* proceedings because Judge Robb is exercising the judicial functions that are in excess of her jurisdiction after the timely challenge.

Seeking a stay pending this Writ from the Honorable Bridget Robb would be impracticable because the result of this Writ Petition would render any decision from Judge Robb void. *See e.g. Bolt v. Smith*, 594 So.2d 864, 864 (Fla.Ct.App.1992) (“further orders of the recused judge are void and have not effect”).

Indeed, because of the timely challenge, Judge Robb is divested of jurisdiction over this matter, and accordingly, should only perform “mechanical duties of transferring the case to another judge or other essential ministerial duties short of adjudication.” *Stringer v. United States*, 233 F.2d 947, 948 (9th Cir. 1956).

II. The purpose of the writ petition would be defeated if a stay is denied

The purpose of the Writ is to reverse Judge Lu’s decision to transfer the *Townley v. Mezzano* matter back to Judge Robb because the challenge was

untimely. When proceedings are not stayed pending the outcome of a challenge to a denial of a timely peremptory challenge, the purpose of the challenge will be frustrated. The litigation will continue despite a serious question pending in the Court of Appeals as to whether Judge Robb has jurisdiction after a timely challenge was filed.

In this case, Ms. Mezzano is challenging Judge Lu's decision to return the underlying matter back to Judge Robb when Ms. Mezzano had filed a peremptory challenge. Ms. Mezzano believes that she is still entitled to challenge Judge Robb because the district court did not have jurisdiction over Ms. Mezzano when the void orders were issued and thus, all the issued orders are a nullity, of no legal effect. Because all of Judge Robb's previous actions are null and void from their inception, there have been no issues raised by the complaint that have been disposed of or otherwise determined. *See e.g. Dobson v Dobson*, 108 Nev 346 (1992)(Steffen, dissenting); *See also C.H.A. Venture v. G. C. Wallace Consulting*, 106 Nev. 381, 794 P.2d 707 (1990) (judgment reversed because service was not properly effected, jurisdiction did not attach and the district court had no power to enter a valid judgment); *Foster v. Lewis*, 78 Nev. 330, 337, 372 P.2d 679, 682 (1962) (a judgment that is based on a void order of publication is void); The Writ petition raises a pure legal question and its purpose will undeniably be defeated if a stay is not granted. Because there is an issue as to whether Judge Robb has

jurisdiction over the underlying district court case, Petitioner should not be required to litigate this matter while the Writ Petition is pending.

Allowing Mr. Townley to continue the underlying litigation as though there were no writ petition pending and before the Court of Appeals renders a decision on Judge Robb's jurisdiction would frustrate the purpose of the Writ Petition and subject Ms. Mezzano to needless litigation and proceedings in derogation of the writ petition. Therefore, the purpose of the Writ Petition would be frustrated if no stay is issued.

III . Petitioner will suffer irreparable or serious injury if the stay is denied

In this case, if no stay is granted, Ms. Mezzano will be forced to continue with the litigation and undoubtedly incurring additional expenses for attorneys' fees and costs for which she will not likely recover from Mr. Townley. If the Writ Petition is granted after Judge Robb makes various orders, then all the orders will be rendered void, and the parties will be back at square one, after spending hours of time and money litigating the case. This would also result in a waste of judicial time and resources as well.

IV . Real Party in Interest will suffer no serious or irreparable harm if the say is granted.

Mr. Townley will not suffer irreparable injury if this Court stays the action pending the determination of Ms. Mezzano's Writ Petition. A stay in this case will

benefit all parties, including Mr. Townley, because the parties will be required to spend needless time and energy litigating the underlying case and obtaining Orders from Judge Robb, only to have those Orders rendered void because the court lacks jurisdiction, because Ms. Mezzano's challenge was proper. Indeed, Mr. Townley currently has two pending motions before Judge Robb that may be rendered void if they are decided before the Court of Appeals renders its decision in favor of Ms. Mezzano.

V. ***Petitioner is likely to succeed on the merits of the writ petition.***

As a matter of right, Ms. Mezzano is entitled to one change of judge by peremptory challenge in any civil action pending in the district court. Ms. Mezzano exercised this right, however, Judge Lu rejected the challenge after failing to consider the Nevada Supreme Court's decision in *Mezzano v. Townley*, 497 P.3d 624 (2021), where the Court concluded that Judge Robb abused her discretion by denying Ms. Mezzano's motion to set aside the default judgment because the judgment was void for lack of service.

The Nevada Supreme Court has consistently held that any order issued by a district court without proper jurisdiction is void, a nullify, and without legal effect. As such, because the district court lacked the power to enter judgment, the district court has effectively rendered no decision related to this case.

Ms. Mezzano is likely to succeed on the merits because it is unlikely that the Court of Appeals will disregard years of legal decisions regarding void orders and find that a void order is a nullity and without legal effect, except when it comes to a peremptory challenge of a judge. Therefore, Ms. Mezzano believes that it is likely that the Court of Appeals will grant her Writ Petition and require the district court to re-assign the underlying case to another judge within the Second Judicial District Court.

III. Conclusion

Because the purpose of the Writ Petition requesting review of Ms. Mezzano's peremptory challenge of Judge Robb would be defeated by allowing litigation to continue; because it is in both Ms. Mezzano and Mr. Townley's best interest to stay the proceedings until the Court of Appeals has made a determination on the Writ since both will suffer serious and irreparable harm; and because it is likely that the Court of Appeals will conclude that Ms. Mezzano's peremptory challenge was timely, this Court of Appeals should grant a stay in the district court proceedings until the Court of Appeals has made a determination on Ms. Mezzano's Writ Petition.

Dated: March 16, 2022.

THE O'MARA LAW FIRM, P.C.

/s/ David C. O'Mara, Esq.

311 E. Liberty Street
Reno, NV 89501

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of The O'Mara Law Firm, P.C., 311 E. Liberty Street, Reno, Nevada 89501, and on this date I served a true and correct copy of the foregoing document on all parties to this action by:

- ☒ Depositing in a sealed envelope placed for collection and mailing in the United States Mail. at Reno, Nevada. following ordinary business practices
- ☐ Personal Delivery
- ☐ Email
- ☐ Federal Express or other overnight delivery
- ☐ Messenger Service
- ☐ Certified Mail with Return Receipt Requested
- ☐ Electronically through the Court's ECF system

addressed as follows:

SILVERMAN KATTELMAN SPRINGGATE, CHTD.
Alexander C. Morey, Esq.
500 Damonte Ranch Pkwy, Ste 675
Reno, Nevada 89521

Counsel for Real Party in Interest

DATED: March 16, 2022

/s/ Bryan Snyder
BRYAN SNYDER

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of The O'Mara Law Firm, P.C., 311 E. Liberty Street, Reno, Nevada 89501, and on this date I served a true and correct copy of the foregoing document on all parties to this action by:

- ☒ Depositing in a sealed envelope placed for collection and mailing in the United States Mail. at Reno, Nevada. following ordinary business practices
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- ☐ Electronically through the Court's ECF system

addressed as follows:

SILVERMAN KATTELMAN SPRINGGATE, CHTD.
Alexander C. Morey, Esq.
500 Damonte Ranch Pkwy, Ste 675
Reno, Nevada 89521

Counsel for Real Party in Interest

DATED: March 16, 2022

/s/ Bryan Snyder
BRYAN SNYDER

INDEX OF EXHIBITS

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5	Letter to Counsel for Ms. Mezzano dated March 11, 2022	2

EXHIBIT 1

EXHIBIT 1

Code:
1 Gary R. Silverman (NSB# 409) Michael V. Kattelman (NSB#6703)
2 John P. Springgate (NSB# 1350) Alexander C. Morey (NSB#11216)
3 Kenton Karrasch (NSB#13515) Benjamin Albers (NSB#11895)
4 Silverman Kattelman Springgate, Chtd.
5 500 Damonte Ranch Parkway, Suite 675
6 Reno, Nevada 89521
7 Telephone: 775/322-3223
8 Facsimile: 775/322-3649
9 Attorney for John Townley

10 **IN THE FAMILY DIVISION**
11 **OF THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
12 **IN AND FOR THE COUNTY OF WASHOE**

13 JOHN TOWNLEY,

14 Plaintiff

Case No. DV19-01564

15 vs.

Dept. 13

16 ROCHELLE MEZZANO and
17 DOES I through XX,
18 to include Doe individuals,
19 corporations, limited liability companies,
20 partnerships, trusts, limited partnerships,
21 and such other individuals or entities
22 as may exist or be formed
23 Defendants.

24 **EX PARTE REQUEST FOR STATUS HEARING**

25 John Townley, through undersigned counsel, requests this Court set an in-person
26 status hearing and direct the parties and their counsel to appear for the purpose of
27 determining the procedural posture of this matter and the precedence of this case (or
28 lack thereof) over the 2021 action, case DV21-01640, involving the same parties and
controversy.

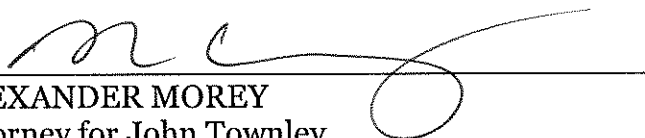
Undersigned counsel provided a copy of this Request to counsel for Rochelle
Mezzano on December 28, 2021. This Request shall be submitted to the Court for
decision after noon on December 29, 2021.

1 This Request for Status Hearing is made pursuant to NRCP 1 and the Nevada
2 Rules of Civil Procedure, the Washoe District Court Rules, Washoe District Family Court
3 Rule 43, the Court's inherent authority to control and order the proceedings before it,
4 Nevada law, and the file in this matter.

5 The undersigned affirms this Request contains no personal information as
6 defined in NRS 239B.030.
7

8 Dated this 28th day of December 2019.

9
10 SILVERMAN KATTELMAN SPRINGGATE, CHTD.

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13 ALEXANDER MOREY
14 Attorney for John Townley
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IN THE FAMILY DIVISION OF THE SECOND JUDICIAL DISTRICT COURT
OF THE STATE OF NEVADA IN AND FOR THE COUNTY OF WASHOE

John Lowley)
)
)
Rockelle vs. Mezzano)
)
)
)

FAMILY DIVISION MOTION/OPPOSITION NOTICE (REQUIRED)
CASE NO. <u>019-01564</u>
DEPT. NO. <u>13</u>

NOTICE: THIS MOTION/OPPOSITION NOTICE **MUST BE ATTACHED AS THE LAST PAGE** to every motion or other paper filed to modify or adjust a final order that was issued pursuant to chapter 125, 125B or 125C of NRS and to any answer or response to such a motion or other paper.

A.	Mark the CORRECT ANSWER with an X .	YES	NO
	1. Has a final decree or custody order been entered in this case? If yes , then continue to Question 2. If no , you do not need to answer any other questions.		X
	2. Is this a motion or an opposition to a motion filed to change a final order? If yes , then continue to Question 3. If no , you do not need to answer any other questions.		
	3. Is this a motion or an opposition to a motion filed only to change the amount of child support?		
	4. Is this a motion or an opposition to a motion for reconsideration or a new trial and the motion was filed within 14 days of the Judge's Order?		
	IF the answer to Question 4 is YES , write in the <u>filing date</u> found on the front page of the Judge's Order.	Date	
B.	If you answered NO to either Question 1 or 2 or YES to Question 3 or 4, you are <u>exempt</u> from the filing fee. However, if the Court later determines you should have paid the filing fee, your motion will <u>not</u> be decided until the fee is paid.		

I affirm that the answers provided on this Notice are true.

Date: 12/26, 2021

Signature:

Print Name:

Print Address:

Telephone Number:

Alexander Moray
Silverman • Kattelman • Springgate, Chtd.
500 Damonte Ranch Parkway, Suite 675
Reno, Nevada 89521
775-322-3223

EXHIBIT 2

EXHIBIT 2

1 CODE:
2
3
4

5 IN THE FAMILY DIVISION
6 OF THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
7 IN AND FOR THE COUNTY OF WASHOE
8

9 JOHN TOWNLEY,
10

11 Plaintiff,

12 vs.

13 ROCHELLE MEZZANO,
14

15 Defendant.
16

Case No. DV19-01564

Dept. No. 13

17 **ORDER GRANTING EX PARTE REQUEST FOR STATUS HEARING**
18

19 This Court reviewed John Townley's ("Mr. Townley") *Ex Parte Request for Status*
20 *Hearing*, submitted on December 29, 2021. It now finds and orders as follows:

21 1. Mr. Townley requests the Court set a status hearing for "determining the
22 procedural posture of this matter and the precedence of this case (or lack thereof) over the
23 2021 action, case DV21-01640, involving the same parties and controversy." Mr. Townley's
24 counsel states he provided a copy of the request to Ms. Mezzano's counsel on December 28,
25 2021.

26 2. The Court finds Mr. Townley has given Ms. Mezzano reasonable notice of his
27 request, and the circumstances justify setting a hearing to address procedural issues related
28 to this case moving forward. See WDFCR 43; see also NRCp 1. The Court finds Ms. Mezzano

1 was electronically served with the request on December 28, 2021. She has not filed a
2 response.

3 3. Good cause appearing, the Parties shall jointly contact the Department 13
4 Judicial Assistant at Janet.Taylor@washoecourts.us within fourteen (14) days of the date
5 of this Order to set a status hearing.

6 IT IS SO ORDERED.

7 Dated: January 15th, 2022.

8 
9 District Judge

EXHIBIT 3

EXHIBIT 3

David O'Mara, Esq.

From: David O'Mara, Esq.
Sent: Tuesday, March 8, 2022 5:09 PM
To: Bryan Snyder; Toni Matts; Alexander Morey
Subject: Townley v. Mezzano

Mr. Morey,

On March 4, 2022, the Nevada Supreme Court transferred Ms. Mezzano's Writ of Mandamus and/or in the Alternative, Writ of Prohibition. Of note, the Nevada Supreme Court did not summarily dismiss the Writ, and thus, one could reasonably assume that the matter will be heard by the Court of Appeals.

I also note that you have filed two motions before Judge Robb, one of which has been submitted, and the other will likely be submitted shortly. While neither of your client's motions are relevant to this matter since the issue of service has not been an issue since my appearance, your request for submissions may cause Judge Robb to issue decisions that are ultimately ruled void because she lacks jurisdiction. In all reality, Mr. Townley's motions are moot and unnecessary so the best course of action would be to withdraw them. Additionally, Judge Robb has set forth a status hearing on this matter for April 6, 2022.

I believe that a stay pending the Court of Appeals decision on the Writ is necessary so that we avoid any adverse consequences should Judge Robb issue orders that are later determined to be void because she did not have jurisdiction after the peremptory challenge was filed.

Again, this certainly does not mean we cannot move forward with the divorce proceedings outside of the Court, however, we certainly don't want to litigate this matter before Judge Robb and then have the Court of Appeal render all of Judge Robb's orders void.

Please let me know if you will stipulate to a stay pending the determination of the writ petition by close of business Thursday, March 10, 2022. Otherwise, I plan to file a motion for stay with the Court of Appeals on Friday, March 11, 2022.

David

David C. O'Mara, Esq.
The O'Mara Law Firm, P.C.
311 E. Liberty Street
Reno, Nevada 89501
775.323.1321

EXHIBIT 4

EXHIBIT 4

SILVERMAN
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SPRINGGATE, Chtd.

Gary R. Silverman*
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March 10, 2022
Via US Mail and email

David O'Mara
O'Mara Law Firm PC
311 E. Liberty St.
Reno, NV 89501

Re: Marriage of Townley and Mezzano, DV19-01564

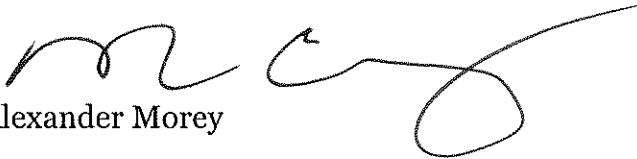
Dear David:

It is unwise to vacate or otherwise lose our calendar time in this case as it may take us months to obtain another hearing date, and I do not agree the Supreme Court's transfer of Ms. Mezzano's writ petition to the Court of Appeals under NRAP 17 necessarily means the writ will not be denied without answer. Nevertheless, I will agree to a stipulation that no order made by Judge Robb in this case will take effect until the Court of Appeals disposes of Ms. Mezzano's writ petition.

Such a stipulation addresses your concern of potentially void orders taking effect and preserves our calendared time with Judge Robb. I await a draft stipulation from your office.

Regards,

SILVERMAN KATTELMAN SPRINGGATE,
CHTD.


Alexander Morey

ACM: tm
cc: client

EXHIBIT 5

EXHIBIT 5

SILVERMAN KATTELMAN SPRINGGATE, Chtd.

Gary R. Silverman*
Michael V. Kattelman
John P. Springgate†
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March 11, 2022
Via US Mail and email

David O'Mara
O'Mara Law Firm PC
311 E. Liberty St.
Reno, NV 89501

Re: Marriage of Townley and Mezzano, DV19-01564

Dear David:

Ms. Mezzano has asserted the following legal positions in this case:

- Ms. Mezzano cannot plead or otherwise defend because the trial court entered her default.
- The trial court's actions prior to the Supreme Court's order of reversal and remand were void.
- The filing of a notice of appearance by counsel on Ms. Mezzano's behalf dispensed with process and service subjecting her to the personal jurisdiction of the court.

Ms. Mezzano's premises lead to the following: because the trial court's actions were void, the trial court had no power to enter Ms. Mezzano's default, and, therefore, Ms. Mezzano has not been defaulted; because the appearance by counsel dispensed with the need for process and service, Ms. Mezzano's time to plead or otherwise defend began to run on that appearance; because that appearance dispensed with the need for process and service, Ms. Mezzano is subject to the jurisdiction of the trial court, and the trial court may enter her default; because it has been more than 21 days since the appearance of counsel, Ms. Mezzano has failed to plead or otherwise defend within the time allotted by the NRCP; because Ms. Mezzano has failed to plead or otherwise defend within the allotted time, the trial court may now enter her default.

///

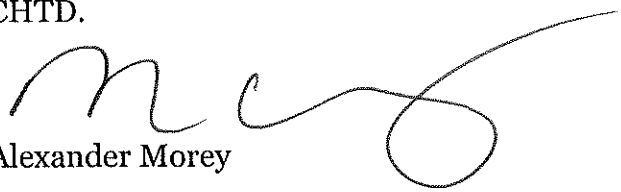
///

*Fellow of the American Academy of Matrimonial Lawyers.
†Nevada Certified Family Law Specialist

In accord with Ms. Mezzano's logic in this action, I will enter her default on March 18, 2022, if Ms. Mezzano has not filed an answer prior to that date.

Regards,

SILVERMAN KATTELMAN SPRINGGATE,
CHTD.


Alexander Morey

ACM: tm
cc: client