

# IN THE SUPREME COURT OF THE STATE OF NEVADA

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Elizabeth A. Brown  
Clerk of Supreme Court

ALLA ZORIKOVA,  
Appellant(s),

vs.

JULIE PYLE; TAMMY WILLET; AND  
VEGAS SHEPHERD RESCUE,  
Respondent(s),

Case No: A-20-821249-C

Docket No: 83478

# RECORD ON APPEAL VOLUME 1

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**EIGHT JUDICIAL DISTRICT COURT**

**CASE NO: A-20-821249-C**  
**Department 20**

**CLARK COUNTY, NEVADA**

7 ALLA ZORIKOVA,

8 Plaintiff,

9 vs.

10 JULIE PYLE, TAMMY WILLET, VEGAS  
11 SHEPHERD RESCUE AND DOES I  
12 THROUGH X, INDIVIDUALS, AND ROE  
BUSINESS ENTITIES I THROUGH X,

13 Defendants

Case No.:

COMPLAINT: FOR DAMAGES

CIVIL CONSPIRACY, TRESPASS, THEFT,  
FRAUD, INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS, PROPERTY  
DAMAGE AND POSESSION OF STOLEN  
PROPERTY

14  
15 COMES NOW Plaintiff, Alla Zorikova, acting Pro Per complains and alleges  
16 against Defendants and each of them as follows:

17 I. THE PARTIES

18  
19 1. Plaintiff, Alla Zorikova, (hereinafter "Plaintiff") is individual, who is currently,  
20 and was at all relevant times herein, a resident of State of California, Los Angeles County.  
21

22 2. Defendant, JULIE PYLE, individual.

23 4233 HELEN AVE., LAS VEGAS, NV 89130  
24

25  
26 3. Defendant, TAMMY WILLET, individual

27 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
28 INFLICTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSESSION OF STOLEN  
PROPERTY - 1

1 2620 REGATTA DRIVE., LAS VEGAS, NV 89128

2  
3  
4 4. Defendant, Vegas Shepherd Rescue, Business entity,

5 2620 REGATTA DRIVE., LAS VEGAS, NV 89128

6  
7  
8 7. All of the acts and/or failures to act were within the scope of any agency or  
9 employment, or were ratified by Defendants and/or their alter egos sued herein as DOES I  
10 through X, ROE Business Entities I through X, inclusive, are presently unknown, and Plaintiff  
11 will amend this Complaint to insert the names when ascertained.  
12

13  
14  
15 II. JURISDICTION AND VENUE

16 8. All Defendants are residents of Clark County, Nevada and therefore, this Court  
17 has personal jurisdiction over Defendants.  
18

19 9. Venue in this district is proper.

20  
21 10. This Court has subject matter jurisdiction over Plaintiff's claim that exceeds  
22 \$15,000 in actual damages.  
23

24  
25 III. FACTS

26  
27  
28 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLECTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 2

1 11. Plaintiff is Alla Zorikova, an individual, an owner of 25 German Shepherd  
2 Dogs and puppies, brought to this court this action to recover damages arising from intentional  
3 acts by Defendants as trespassing Plaintiff's private property and of stealing Plaintiff's 25  
4 German Shepherd Dogs and puppies from Plaintiff's private property.  
5

6 12. At all times relevant hereto, Plaintiff has been and still is the holder of the  
7 exclusive ownership of 25 German Shepherd Dogs in vast majority imported from Europe, from  
8 top champion bloodlines, world class pedigrees, AKC registered and trained for personal  
9 protection (referred hereinafter as "Dogs").  
10

11 13. Plaintiff trains and sales Personal Protection German Shepherd Dogs  
12

13 <http://vonmarkgrafgermanshepherds.us>  
14

15 14. On August 08 of 2020 to August 10 of 2020 Defendants intentionally  
16 organized act of stealing Dogs from Plaintiff's private property located in San Bernandino  
17 County, CA.  
18

19 15. On August 08 of 2020 Plaintiff and her daughter was falsely arrested and  
20 released on August 11 of 2020, no charges have been filed.  
21

22 16. After Plaintiff returned on August 11 of 2020 to her property, she discovered  
23 that all her 50 Dogs and puppies have been missing from the property.  
24

25 17. Plaintiff and her attorney retrieved 25 missing Dogs from Devore Animal  
26 Shelter on August 12 of 2020.  
27

28 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLICTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 3



1 18. Plaintiff filed police report with San Bernandino County Sheriff Barstow  
2 Station regarding 25 Dogs and puppies being stolen of monetary value of \$1,150,000.00 total .  
3

4 19. Plaintiff mailed and emailed multiple Demand Letters to Defendants and left  
5 multiple voice messages on Defendant's Tammy Willet cellphone and on Defendants business  
6 phone demanding them to return Plaintiff's Dogs to Plaintiff.  
7

8 20. Plaintiff emailed to Defendants microchips numbers, AKC litters and other  
9 certifications for the Dogs demanded.  
10

11 21. Sheriff Barstow Station and Animal Control personnel stated that the missing  
12 25 Dogs and puppies have been taken by and in possession of Vegas Pet Rescue Project  
13 (Founder of which is Defendant Jamie Gregory).  
14

15 22. Further, Sheriff Barstow Station and Animal Control personnel stated that no  
16 one authorized Vegas Pet Rescue Project, nor any other rescue organization nor private person  
17 to enter Plaintiff's private Property and to take the Dogs.  
18

19 23. Furthermore, Plaintiff demanded from Defendant to disclose any and all  
20 information they have on the German Shepherd Dogs that Defendants "rescued" in San  
21 Bernandino County on August 08<sup>th</sup> to 11<sup>th</sup> of 2020.  
22

23 24. Furthermore, Plaintiff stated to Defendants that at least 7 German Shepherd  
24 Dogs displayed on Defendant's Business Face Book account belongs to Plaintiff and that  
25 Defendants must not neither sale nor alter nor dispose the Dogs in any manner but to return the  
26

27 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
28 INFLECTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 4

1 Dogs to Plaintiff. Detailed description with clear images that also constitutes names of the Dogs  
2 have been emailed to Defendants. (Attachments 1-9).

3  
4 25. Defendants failed to disclose to Plaintiff any information on the Dogs they  
5 “rescued” and received from San Bernardino County on August 08<sup>th</sup> to 11<sup>th</sup> of 2020.

6  
7 IV. CLAIMS FOR RELIEF

8 A. FIRST CAUSE OF ACTION THEFT (according to NRS 41.580)

9  
10 26. Plaintiff repeats and incorporates by this reference each and every allegation  
11 set  
12 forth in paragraphs 1 through 23, inclusive.

13  
14 27. Dogs defined as “property” in NRS **193.021**

15  
16 28. Defendants stole Plaintiff’s dogs with intent to deprive Plaintiff from it’s  
17 property.

18  
19 29. Defendant failed to return the Dogs to the Plaintiff.

20  
21 30. Action of stealing Plaintiff’s dogs was NOT authorized by Sheriff’s  
22 Department as only Animal Control of San Bernardino County is allowed legally to take the  
23 animals.

24  
25 31. Plaintiff is lawful owner of the Dogs.

26  
27 32. The Dogs stolen by Defendants were on Plaintiff’s Private Property.

28 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLECTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 5

1                   33. The 11 acres private Property was fully fenced with “No Trespassing” and  
2 “Private Property” signs displayed.

3  
4                   34. Plaintiff neither had nor gave consent nor permission to Defendants to take  
5 her Dogs.

6  
7                   35. Defendants had taken the Dogs from Plaintiff’s property with the intent of not  
8 returning them to the owner.

9                   36. Defendants committed aggravated larceny toward Plaintiff.

10  
11  
12  
13                   B. SECOND CAUSE OF ACTION CIVIL CONSPIRACY

14  
15  
16                   37. Plaintiff repeats and incorporates by this reference each and every allegation  
17 set forth in paragraphs 1 through 36, inclusive.

18  
19                   38. Plaintiff believes and alleges that Defendants had conspired to taking, selling,  
20 concealing, or disposing of Plaintiff’s Dogs with intent to defraud Plaintiff and to receive money  
21 from the sale of the Dog or for some impossible to reasoning evil motive.

22  
23                   C. THIRD CAUSE OF ACTION TRESPASS

24  
25                   39. Plaintiff repeats and incorporates by this reference each and every allegation  
26 set forth in paragraphs 1 through 38, inclusive.

27  
28 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLECTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 6

1 40. Plaintiff believes that Defendants entered Plaintiff's private property at 13350  
2 Trump Blvd., Barstow CA 92311 on August 08th to 11<sup>th</sup> of 2020 with intent to steal her German  
3 Shepherd Dogs.  
4

5 41. Plaintiff's 11 acres Property is fully fenced, 7 signs "Private Property" and  
6 "No Trespassing" placed around the Property.  
7

8 42. One of the Defendant's truck captured on pictures while Defendants were  
9 loading Plaintiff's Dogs on their truck (Attachment \_4\_).  
10

11 43. Another Picture displays Defendants on the Plaintiff's property while they are  
12 capturing the Dogs. (Attachment 5).  
13

#### 14 D. FOURTH CAUSE OF ACTION FRAUD

15 44. Plaintiff repeats and incorporates by this reference each and every allegation  
16 set forth in paragraphs 1 through 43, inclusive.  
17

18 45. Plaintiff provided Defendants with multiple Demand Letters in which Plaintiff  
19 asks and requests Defendants to return Plaintiff's Dogs that Defendants "rescued" on August 08<sup>th</sup>  
20 to 10<sup>th</sup> of 2020.  
21

22 46. Defendants concealed from Plaintiff the fact that they had "rescued" or took  
23 and received German Shepherd Dogs in San Bernardino County on August 08<sup>th</sup> to 11<sup>th</sup> of 2020.  
24

25 47. Defendants failed to return the Dogs and therefore, concealed the Dogs from  
26 Plaintiff.  
27

28 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLECTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 7

1 E. FIFTH CAUSE OF ACTION INTENTIONAL INFLICTION OF  
2 EMOTIONAL DISTRESS  
3

4 48. Plaintiff repeats and incorporates by this reference each and every allegation  
5 set forth in paragraphs 1 through 47, inclusive.  
6

7 49. Defendants caused substantial emotional distress to Plaintiff by stealing her  
8 Dogs.  
9

10 50. 2 stolen by Defendants German shepherd females were pregnant and one  
11 german shepherd female was in her whelping stage, also there were young puppies among stolen  
12 by Defendants Dogs.  
13

14 51. Plaintiff was travmatized by the intentional malicious actions of Defendant  
15 who stole Plaintiff's Dogs.  
16

17 52. Plaintiff could not sleep nor eat.  
18

19 53. Plaintiff was crying every day from the day she learned that her Dogs has  
20 been stolen.  
21

22 54. Plaintiff raised her Dogs from the day they were born and had big emotional  
23 attachments to each Dog.  
24

25 55. Plaintiff had high blood pressure and suffered heart pain.  
26

27 56. Plaintiff was taking aspirine daily to minimize her heart pain and to prevent  
28 heart attack.

COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLICTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 8

1 57. Plaintiff had high headaches.

2  
3  
4 F. SIX CAUSE OF ACTION PROPERTY DAMAGE

5  
6 58. Plaintiff repeats and incorporates by this reference each and every allegation  
7 set forth in paragraphs 1 through 57, inclusive.

8  
9 59. Plaintiff's Dogs and puppies that have been stolen, and most likely spayed or  
10 neutered by Defendants are of total value of \$890,000.00.

11  
12 V. JURY DEMAND

13 60. Plaintiff hereby demands a jury trial in this case.

14  
15 VI. PRAYER FOR RELIEF

16  
17 WHEREFORE, Plaintiff Alla Zorikova, acting Pro Per, respectfully prays for  
18 judgment as follows:

- 19 1. For immediate injunction relief under NRS 33.010 and to order to return the Dogs,  
20 displayed in Attachments 1-9 and all other Dogs owned by Plaintiff that are in possession  
21 of Defendants, to Plaintiff .  
22  
23 2. For immediate injunction relief under NRS 33.010 as to order to Defendants to disclose  
24 all information such as to show Dogs in person or to show their pictures or provide  
25 description on all and any German Shepherd Dogs and puppies that Defendant received,  
26 took into possession from August 08<sup>th</sup> of 2020 to September 12th of 2020.

27  
28 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLICTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 9

3. For immediate injunction relief under 33.015 restricting Defendants to sale, alter or otherwise destroy the German Shepherd Dogs and puppies that Defendant received, took into possession, had into possession from August 08<sup>th</sup> of 2020 until present, and particularly the Dogs displayed on Attachments 1-9.
4. That the Court enter a judgment against Defendants and each of them, that they have injured the Plaintiff by Defendants' acts and conduct set forth in this Complaint.
5. For actual, general and special damages in excess of \$15,000;
6. For compensatory damages in in excess of \$15,000;
7. For pain and suffering damages in in excess of \$15,000;
8. For punitive damages to punish or deter the misconduct according to proof as defined by NRS 42.005.
9. That the Court issue injunctive relief against Defendants, and that Defendants and each of them, returned the Plaintiff's Dogs immediately;
10. Three times the value of the property at the time it was willfully damaged or was the subject of a theft offense by NRS 41.580.
11. For loss of profit that Plaintiff suffered in the amount to be determined by juries at trial.
12. For an award of costs as otherwise provided by law;
13. For an award of pre-judgment interest and post-judgment interest in the maximum amount permitted by law;
14. For such other and further relief as the Court deems just and proper.

Dated: September 011 of 2020

COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSESSION OF STOLEN PROPERTY - 10

1  
2 Respectfully submitted, ALLA ZORIKOVA



3  
4 **VERIFICATION**

5 I, Alla Zorikova am a Plaintiff in the above-entitled action. I have read the foregoing  
6 complaint and know the contents thereof. The same is true of my own knowledge, except as to  
7 those matters which are therein alleged on information and belief, and as to those matters, I  
8 believe it to be true.  
9

10 I declare under penalty of perjury that the foregoing is true and correct and that this  
11 declaration was executed in San Bernardino county, CA.  
12

13  
14 

15 Alla Zorikova  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

27 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
28 INFLECTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 11



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*Heather S. Lemin*  
CLERK OF THE COURT

1 Alla Zorikova  
2 1905 Wilcox Av., #175  
3 Los Angeles, CA 90068  
4 3232095186  
5 Olivia.car@mail.ru

**EIGHT JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

7 ALLA ZORIKOVA,

8 Plaintiff,

9 vs.

10 JULIE PYLE, TAMMY WILLET, VEGAS  
11 SHEPHERD RESCUE AND DOES I  
12 THROUGH X, INDIVIDUALS, AND ROE  
13 BUSINESS ENTITIES I THROUGH X,

14 Defendants

Case No.:

*A-20-821249-C*

COMPLAINT: FOR DAMAGES

CIVIL CONSPIRACY, TRESPASS, THEFT,  
FRAUD, INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS, PROPERTY  
DAMAGE AND POSESSION OF STOLEN  
PROPERTY

15 COMES NOW Plaintiff, Alla Zorikova, acting Pro Per complains and alleges  
16 against Defendants and each of them as follows:

17 I. THE PARTIES

18  
19 1. Plaintiff, Alla Zorikova, (hereinafter "Plaintiff") is individual, who is currently,  
20 and was at all relevant times herein, a resident of State of California, Los Angeles County.  
21

22 2. Defendant, JULIE PYLE, individual.

23 4233 HELEN AVE., LAS VEGAS, NV 89130

24 3. Defendant, TAMMY WILLET, individual

25 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
26 INFLICTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSESSION OF STOLEN  
27 PROPERTY - 1

CLERK OF THE COURT  
SEP 21 2020  
RECEIVED

1 2620 REGATTA DRIVE., LAS VEGAS, NV 89128

2  
3  
4 4. Defendant, Vegas Shepherd Rescue, Business entity,

5 2620 REGATTA DRIVE., LAS VEGAS, NV 89128

6  
7  
8 7. All of the acts and/or failures to act were within the scope of any agency or  
9 employment, or were ratified by Defendants and/or their alter egos sued herein as DOES I  
10 through X, ROE Business Entities I through X, inclusive, are presently unknown, and Plaintiff  
11 will amend this Complaint to insert the names when ascertained.  
12

13  
14  
15 II. JURISDICTION AND VENUE

16 8. All Defendants are residents of Clark County, Nevada and therefore, this Court  
17 has personal jurisdiction over Defendants.  
18

19 9. Venue in this district is proper.

20  
21 10. This Court has subject matter jurisdiction over Plaintiff's claim that exceeds  
22 \$15,000 in actual damages.  
23

24  
25 III. FACTS

26  
27  
28 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLICTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 2

1 11. Plaintiff is Alla Zorikova, an individual, an owner of 25 German Shepherd  
2 Dogs and puppies, brought to this court this action to recover damages arising from intentional  
3 acts by Defendants as trespassing Plaintiff's private property and of stealing Plaintiff's 25  
4 German Shepherd Dogs and puppies from Plaintiff's private property.  
5

6 12. At all times relevant hereto, Plaintiff has been and still is the holder of the  
7 exclusive ownership of 25 German Shepherd Dogs in vast majority imported from Europe, from  
8 top champion bloodlines, world class pedigrees, AKC registered and trained for personal  
9 protection (referred hereinafter as "Dogs").  
10

11 13. Plaintiff trains and sales Personal Protection German Shepherd Dogs  
12

13 <http://vonmarkgrafgermanshepherds.us>  
14

15 14. On August 08 of 2020 to August 10 of 2020 Defendants intentionally  
16 organized act of stealing Dogs from Plaintiff's private property located in San Bernandino  
17 County, CA.  
18

19 15. On August 08 of 2020 Plaintiff and her daughter was falsely arrested and  
20 released on August 11 of 2020, no charges have been filed.  
21

22 16. After Plaintiff returned on August 11 of 2020 to her property, she discovered  
23 that all her 50 Dogs and puppies have been missing from the property.  
24

25 17. Plaintiff and her attorney retrieved 25 missing Dogs from Devore Animal  
26 Shelter on August 12 of 2020.  
27

28 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLICTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 3

1 18. Plaintiff filed police report with San Bernandino County Sheriff Barstow  
2 Station regarding 25 Dogs and puppies being stolen of monetary value of \$1,150,000.00 total .  
3

4 19. Plaintiff mailed and emailed multiple Demand Letters to Defendants and left  
5 multiple voice messages on Defendant's Tammy Willet cellphone and on Defendants business  
6 phone demanding them to return Plaintiff's Dogs to Plaintiff.  
7

8 20. Plaintiff emailed to Defendants microchips numbers, AKC litters and other  
9 certifications for the Dogs demanded.  
10

11 21. Sheriff Barstow Station and Animal Control personnel stated that the missing  
12 25 Dogs and puppies have been taken by and in possession of Vegas Pet Rescue Project  
13 (Founder of which is Defendant Jamie Gregory).  
14

15 22. Further, Sheriff Barstow Station and Animal Control personnel stated that no  
16 one authorized Vegas Pet Rescue Project, nor any other rescue organization nor private person  
17 to enter Plaintiff's private Property and to take the Dogs.  
18

19 23. Furthermore, Plaintiff demanded from Defendant to disclose any and all  
20 information they have on the German Shepherd Dogs that Defendants "rescued" in San  
21 Bernandino County on August 08<sup>th</sup> to 11<sup>th</sup> of 2020.  
22

23 24. Furthermore, Plaintiff stated to Defendants that at least 7 German Shepherd  
24 Dogs displayed on Defendant's Business Face Book account belongs to Plaintiff and that  
25 Defendants must not neither sale nor alter nor dispose the Dogs in any manner but to return the  
26

27  
28 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLICTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 4

1 Dogs to Plaintiff. Detailed description with clear images that also constitutes names of the Dogs  
2 have been emailed to Defendants. (Attachments 1-9).

3  
4 25. Defendants failed to disclose to Plaintiff any information on the Dogs they  
5 “rescued” and received from San Bernardino County on August 08<sup>th</sup> to 11<sup>th</sup> of 2020.

6  
7 IV. CLAIMS FOR RELIEF

8 A. FIRST CAUSE OF ACTION THEFT (according to NRS 41.580)

9  
10 26. Plaintiff repeats and incorporates by this reference each and every allegation  
11 set

12  
13 forth in paragraphs 1 through 23, inclusive.

14 27. Dogs defined as “property” in NRS 193.021

15 28. Defendants stole Plaintiff’s dogs with intent to deprive Plaintiff from it’s  
16  
17 property.

18 29. Defendant failed to return the Dogs to the Plaintiff.

19  
20 30. Action of stealing Plaintiff’s dogs was NOT authorized by Sheriff’s  
21 Department as only Animal Control of San Bernardino County is allowed legally to take the  
22 animals.

23  
24 31. Plaintiff is lawful owner of the Dogs.

25  
26 32. The Dogs stolen by Defendants were on Plaintiff’s Private Property.

27  
28 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLICTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 5



1 33. The 11 acres private Property was fully fenced with "No Trespassing" and  
2 "Private Property" signs displayed.

3  
4 34. Plaintiff neither had nor gave consent nor permission to Defendants to take  
5 her Dogs.

6  
7 35. Defendants had taken the Dogs from Plaintiff's property with the intent of not  
8 returning them to the owner.

9  
10 36. Defendants committed aggravated larceny toward Plaintiff.

11  
12  
13 B. SECOND CAUSE OF ACTION CIVIL CONSPIRACY

14  
15  
16 37. Plaintiff repeats and incorporates by this reference each and every allegation  
17 set forth in paragraphs 1 through 36, inclusive.

18  
19 38. Plaintiff believes and alleges that Defendants had conspired to taking, selling,  
20 concealing, or disposing of Plaintiff's Dogs with intent to defraud Plaintiff and to receive money  
21 from the sale of the Dog or for some impossible to reasoning evil motive.

22  
23 C. THIRD CAUSE OF ACTION TRESPASS

24  
25 39. Plaintiff repeats and incorporates by this reference each and every allegation  
26 set forth in paragraphs 1 through 38, inclusive.

27  
28 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLECTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 6

1 40. Plaintiff believes that Defendants entered Plaintiff's private property at 13350  
2 Trump Blvd., Barstow CA 92311 on August 08th to 11<sup>th</sup> of 2020 with intent to steal her German  
3 Shepherd Dogs.  
4

5 41. Plaintiff's 11 acres Property is fully fenced, 7 signs "Private Property" and  
6 "No Trespassing" placed around the Property.  
7

8 42. One of the Defendant's truck captured on pictures while Defendants were  
9 loading Plaintiff's Dogs on their truck (Attachment \_4\_).  
10

11 43. Another Picture displays Defendants on the Plaintiff's property while they are  
12 capturing the Dogs. (Attachment 5).  
13

#### 14 D. FOURTH CAUSE OF ACTION FRAUD

15 44. Plaintiff repeats and incorporates by this reference each and every allegation  
16 set forth in paragraphs 1 through 43, inclusive.  
17

18 45. Plaintiff provided Defendants with multiple Demand Letters in which Plaintiff  
19 asks and requests Defendants to return Plaintiff's Dogs that Defendants "rescued" on August 08<sup>th</sup>  
20 to 10<sup>th</sup> of 2020.  
21

22 46. Defendants concealed from Plaintiff the fact that they had "rescued" or took  
23 and received German Shepherd Dogs in San Bernandino County on August 08<sup>th</sup> to 11<sup>th</sup> of 2020.  
24

25 47. Defendants failed to return the Dogs and therefore, concealed the Dogs from  
26 Plaintiff.  
27

28 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLECTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 7

1 E. FIFTH CAUSE OF ACTION INTENTIONAL INFLECTION OF  
2 EMOTIONAL DISTRESS  
3

4 48. Plaintiff repeats and incorporates by this reference each and every allegation  
5 set forth in paragraphs 1 through 47, inclusive.  
6

7 49. Defendants caused substantial emotional distress to Plaintiff by stealing her  
8 Dogs.  
9

10 50. 2 stolen by Defendants German shepherd females were pregnant and one  
11 german shepherd female was in her whelping stage, also there were young puppies among stolen  
12 by Defendants Dogs.  
13

14 51. Plaintiff was travmatized by the intentional malicious actions of Defendant  
15 who stole Plaintiff's Dogs.  
16

17 52. Plaintiff could not sleep nor eat.  
18

19 53. Plaintiff was crying every day from the day she learned that her Dogs has  
20 been stolen.  
21

22 54. Plaintiff raised her Dogs from the day they were born and had big emotional  
23 attachments to each Dog.  
24

25 55. Plaintiff had high blood pressure and suffered heart pain.  
26

27 56. Plaintiff was taking aspirine daily to minimize her heart pain and to prevent  
28 heart attack.

COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLECTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSESSION OF STOLEN  
PROPERTY - 8

1 57. Plaintiff had high headaches.

2  
3  
4 F. SIX CAUSE OF ACTION PROPERTY DAMAGE

5  
6 58. Plaintiff repeats and incorporates by this reference each and every allegation  
7 set forth in paragraphs 1 through 57, inclusive.

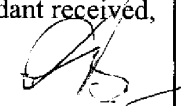
8  
9 59. Plaintiff's Dogs and puppies that have been stolen, and most likely spayed or  
10 neutered by Defendants are of total value of \$890,000.00.

11  
12 V. JURY DEMAND

13 60. Plaintiff hereby demands a jury trial in this case.

14  
15 VI. PRAYER FOR RELIEF

16  
17 WHEREFORE, Plaintiff Alla Zorikova, acting Pro Per, respectfully prays for  
18 judgment as follows:

- 19 1. For immediate injunction relief under NRS 33.010 and to order to return the Dogs,  
20 displayed in Attachments 1-9 and all other Dogs owned by Plaintiff that are in possession  
21 of Defendants, to Plaintiff.  
22  
23 2. For immediate injunction relief under NRS 33.010 as to order to Defendants to disclose  
24 all information such as to show Dogs in person or to show their pictures or provide  
25 description on all and any German Shepherd Dogs and puppies that Defendant received,  
26 took into possession from August 08<sup>th</sup> of 2020 to September 12th of 2020. 

27  
28 COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLICTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 9

3. For immediate injunction relief under 33.015 restricting Defendants to sale, alter or otherwise destroy the German Shepherd Dogs and puppies that Defendant received, took into possession, had into possession from August 08<sup>th</sup> of 2020 until present, and particularly the Dogs displayed on Attachments 1-9.
4. That the Court enter a judgment against Defendants and each of them, that they have injured the Plaintiff by Defendants' acts and conduct set forth in this Complaint.
5. For actual, general and special damages in excess of \$15,000;
6. For compensatory damages in in excess of \$15,000;
7. For pain and suffering damages in in excess of \$15,000;
8. For punitive damages to punish or deter the misconduct according to proof as defined by NRS 42.005.
9. That the Court issue injunctive relief against Defendants, and that Defendants and each of them, returned the Plaintiff's Dogs immediately;
10. Three times the value of the property at the time it was willfully damaged or was the subject of a theft offense by NRS 41.580.
11. For loss of profit that Plaintiff suffered in the amount to be determined by juries at trial.
12. For an award of costs as otherwise provided by law;
13. For an award of pre-judgment interest and post-judgment interest in the maximum amount permitted by law;
14. For such other and further relief as the Court deems just and proper.

Dated: September 011 of 2020



COMPLAINT: FOR DAMAGES CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN PROPERTY - 10

1  
2 Respectfully submitted, ALLA ZORIKOVA



3  
4 **VERIFICATION**

5 I, Alla Zorikova am a Plaintiff in the above-entitled action. I have read the foregoing  
6 complaint and know the contents thereof. The same is true of my own knowledge, except as to  
7 those matters which are therein alleged on information and belief, and as to those matters, I  
8 believe it to be true.  
9

10 I declare under penalty of perjury that the foregoing is true and correct and that this  
11 declaration was executed in San Bernardino county, CA.  
12

13  
14 Alla Zorikova



15  
16  
17  
18  
19  
20  
21  
22  
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26  
27  
28 COMPLAINT FOR DAMAGES, CIVIL CONSPIRACY, TRESPASS, THEFT, FRAUD, INTENTIONAL  
INFLECTION OF EMOTIONAL DISTRESS, PROPERTY DAMAGE AND POSSESSION OF STOLEN  
PROPERTY - 11



**Vegas Shepherd Rescue**

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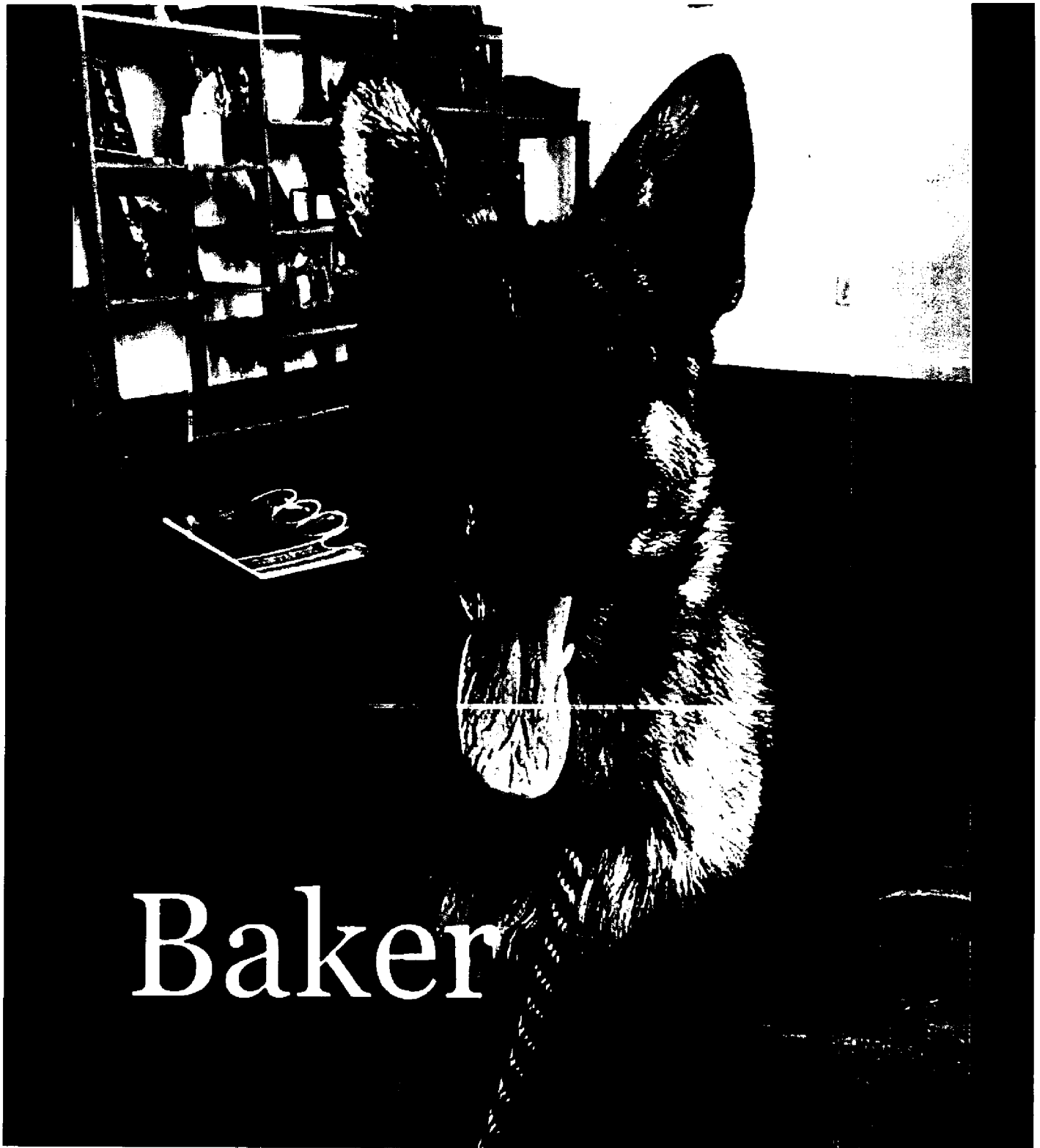
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*Case A-20-821249-C  
Plaintiff's Exhibit 1*



# Baker



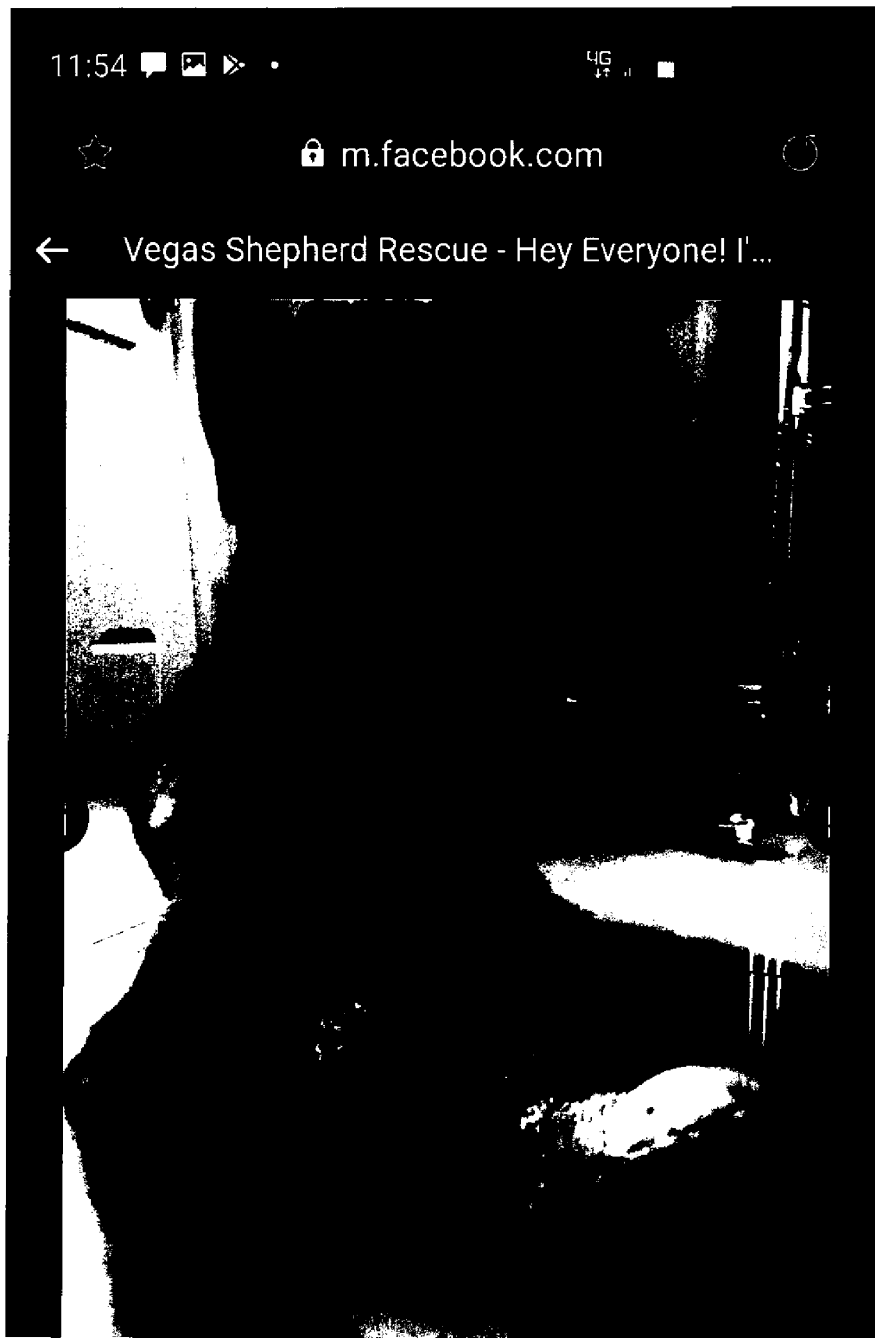
**Vegas Shepherd Rescue**

Mobile Uploads · Aug 11 ·

[View Full Size](#) · [More Options](#)

*Case A-20-821249-C  
Plaintiff's Exhibit 2*





**Vegas Shepherd Rescue**

Hey Everyone! I'm going to be on Las Vegas Morning Blend today at 9:32 am. Please watch me! I'm very excited to be making my television debut 😊

Timeline Photos · Sep 3 ·

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Case A-20-821249-C  
Plaintiff's Exhibit 3



**Vegas Shepherd Rescue**

Beacon · Aug 12 ·

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*Case A-20-821249-C  
Plaintiff's Exhibit 4*

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**Vegas Shepherd Rescue**

Timeline Photos · Aug 12 ·

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Comment



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Write a comment...



*Case H-20-821249-C  
Plaintiff's Exhibit*

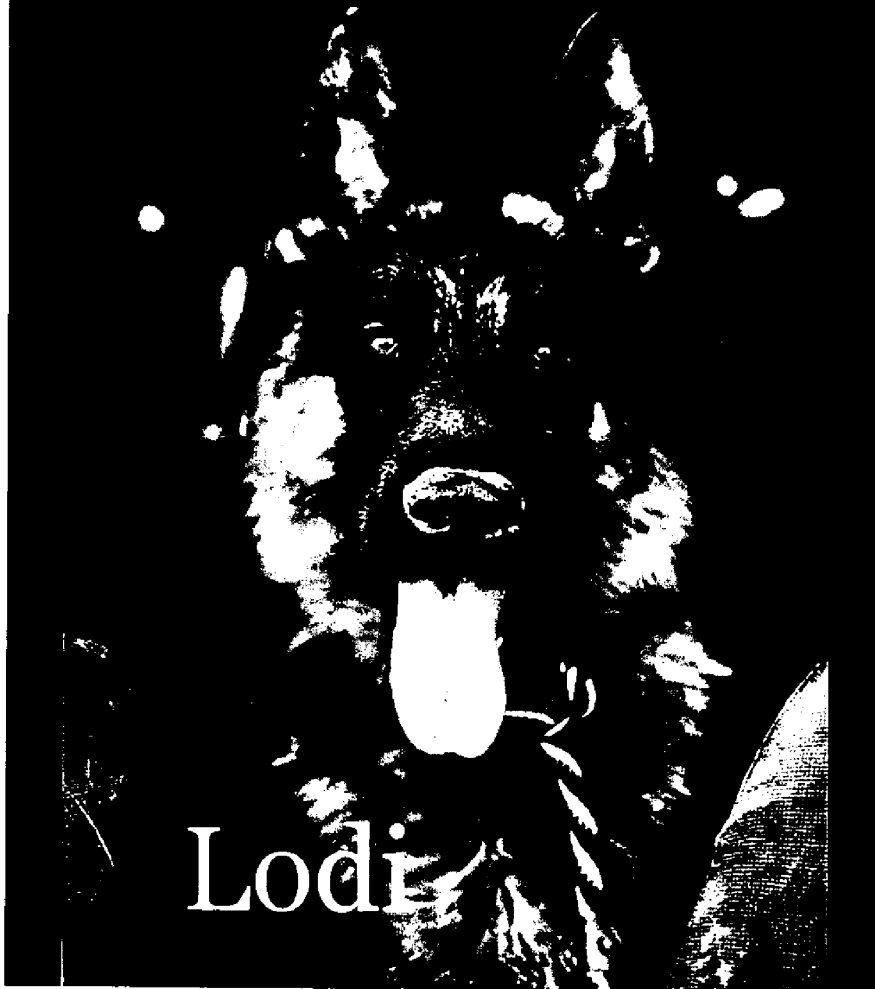
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Vegas Shepherd Rescue

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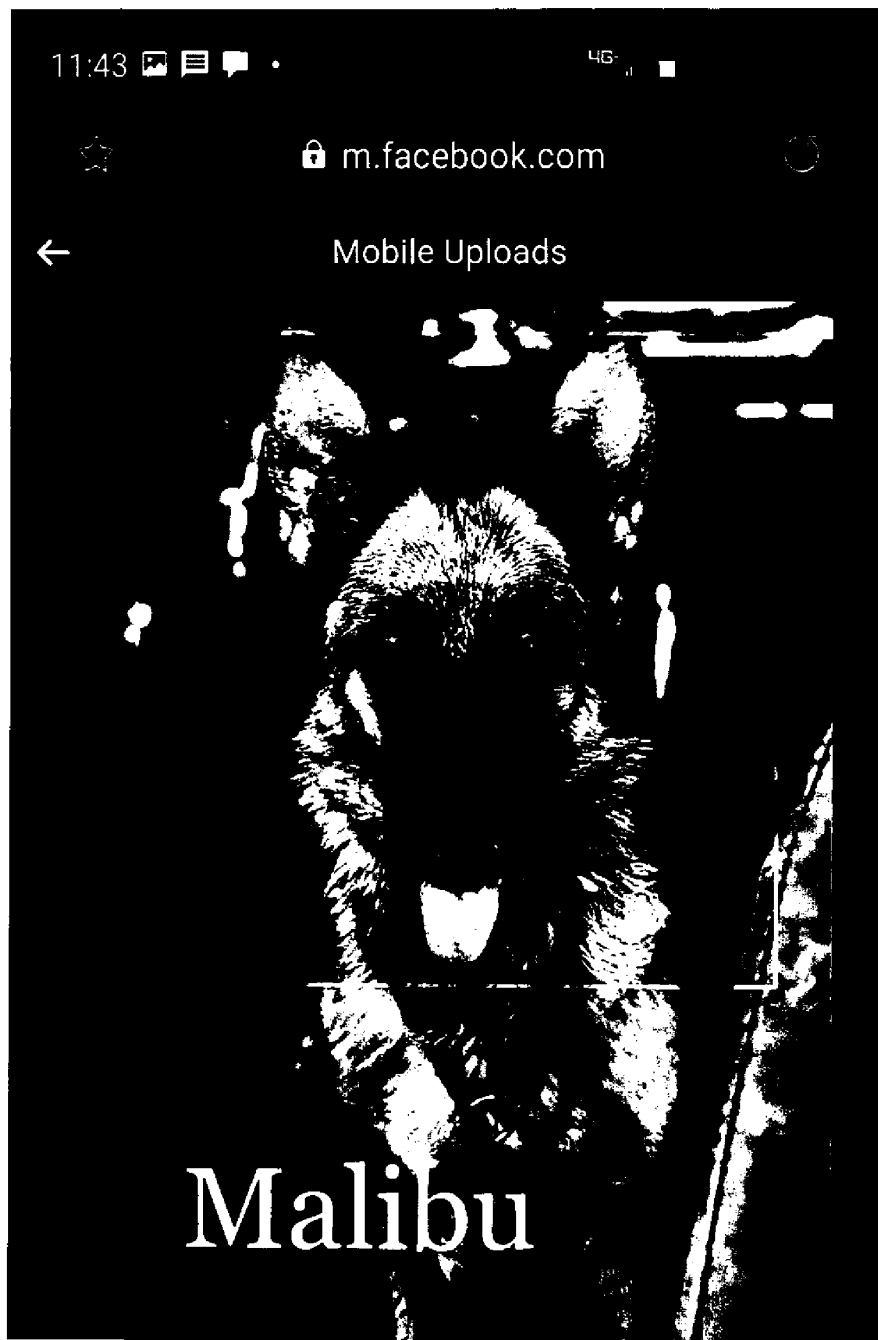
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*Case A-20-821249-C  
Plaintiff's Exhibit 5*



Vegas Shepherd Rescue

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Case A-20-821249-C  
Plaintiff's Exhibit 6




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*Case A-20-821249-C  
Plaintiff's Exhibit 2*

# DISTRICT COURT CIVIL COVER SHEET

County, Nevada  
Case No. A-PC-821249-C  
(Assigned by Clerk's Office)

## I. Party Information (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone):

**Alla Zarikova**  
1905 Wilcox Ave, #175,  
L.A., CA 90068  
323-209-5186

Attorney (name/address/phone):

**PROPER**

Defendant(s) (name/address/phone):

**Julie Pyle**, 4233 Helan Av.,  
Las Vegas, NV 89130  
**Tammy Willet**  
**Vegas Shepherd Rescue**  
2620 Regatta Dr., Las Vegas,  
NV 89128

Attorney (name/address/phone):

## II. Nature of Controversy (please select the one most applicable filing type below)

### Civil Case Filing Types

<p><b>Real Property</b></p> <p><b>Landlord/Tenant</b></p> <p><input type="checkbox"/> Unlawful Detainer</p> <p><input type="checkbox"/> Other Landlord/Tenant</p> <p><b>Title to Property</b></p> <p><input type="checkbox"/> Judicial Foreclosure</p> <p><input type="checkbox"/> Other Title to Property</p> <p><b>Other Real Property</b></p> <p><input type="checkbox"/> Condemnation/Eminent Domain</p> <p><input type="checkbox"/> Other Real Property</p>	<p><b>Negligence</b></p> <p><input type="checkbox"/> Auto</p> <p><input type="checkbox"/> Premises Liability</p> <p><input type="checkbox"/> Other Negligence</p> <p><b>Malpractice</b></p> <p><input type="checkbox"/> Medical/Dental</p> <p><input type="checkbox"/> Legal</p> <p><input type="checkbox"/> Accounting</p> <p><input type="checkbox"/> Other Malpractice</p>	<p><b>Torts</b></p> <p><b>Other Torts</b></p> <p><input type="checkbox"/> Product Liability</p> <p><input type="checkbox"/> Intentional Misconduct</p> <p><input type="checkbox"/> Employment Tort</p> <p><input type="checkbox"/> Insurance Tort</p> <p><input checked="" type="checkbox"/> Other Tort</p>
<p><b>Probate</b> (select case type and estate value)</p> <p><input type="checkbox"/> Summary Administration</p> <p><input type="checkbox"/> General Administration</p> <p><input type="checkbox"/> Special Administration</p> <p><input type="checkbox"/> Set Aside</p> <p><input type="checkbox"/> Trust/Conservatorship</p> <p><input type="checkbox"/> Other Probate</p> <p><b>Estate Value</b></p> <p><input type="checkbox"/> Over \$200,000</p> <p><input type="checkbox"/> Between \$100,000 and \$200,000</p> <p><input type="checkbox"/> Under \$100,000 or Unknown</p> <p><input type="checkbox"/> Under \$2,500</p>	<p><b>Construction Defect &amp; Contract</b></p> <p><b>Construction Defect</b></p> <p><input type="checkbox"/> Chapter 40</p> <p><input type="checkbox"/> Other Construction Defect</p> <p><b>Contract Case</b></p> <p><input type="checkbox"/> Uniform Commercial Code</p> <p><input type="checkbox"/> Building and Construction</p> <p><input type="checkbox"/> Insurance Carrier</p> <p><input type="checkbox"/> Commercial Instrument</p> <p><input type="checkbox"/> Collection of Accounts</p> <p><input type="checkbox"/> Employment Contract</p> <p><input type="checkbox"/> Other Contract</p>	<p><b>Judicial Review/Appeal</b></p> <p><b>Judicial Review</b></p> <p><input type="checkbox"/> Foreclosure Mediation Case</p> <p><input type="checkbox"/> Petition to Seal Records</p> <p><input type="checkbox"/> Mental Competency</p> <p><b>Nevada State Agency Appeal</b></p> <p><input type="checkbox"/> Department of Motor Vehicle</p> <p><input type="checkbox"/> Worker's Compensation</p> <p><input type="checkbox"/> Other Nevada State Agency</p> <p><b>Appeal Other</b></p> <p><input type="checkbox"/> Appeal from Lower Court</p> <p><input type="checkbox"/> Other Judicial Review/Appeal</p>
<p><b>Civil Writ</b></p> <p><b>Civil Writ</b></p> <p><input type="checkbox"/> Writ of Habeas Corpus</p> <p><input type="checkbox"/> Writ of Mandamus</p> <p><input type="checkbox"/> Writ of Quo Warrant</p> <p><input type="checkbox"/> Writ of Prohibition</p> <p><input type="checkbox"/> Other Civil Writ</p>		<p><b>Other Civil Filing</b></p> <p><b>Other Civil Filing</b></p> <p><input type="checkbox"/> Compromise of Minor's Claim</p> <p><input type="checkbox"/> Foreign Judgment</p> <p><input type="checkbox"/> Other Civil Matters</p>

Business Court filings should be filed using the Business Court civil cover sheet.

09/12/20  
Date

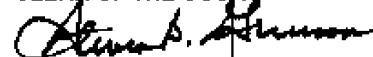
[Signature]  
Signature of initiating party or representative

See other side for family-related case filings.

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Steven D. Grierson  
CLERK OF THE COURT



1 **SUMM**

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DISTRICT COURT

CLARK COUNTY, NEVADA

Plaintiff(s),

CASE NO.

-vs-

DEPT. NO.

Defendant(s).

16

### SUMMONS - CIVIL

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**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU  
WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS.  
READ THE INFORMATION BELOW.**

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STEVEN D. GRIERSON  
CLERK OF COURT

Submitted by:

By: \_\_\_\_\_  
Deputy Clerk                      Date

Regional Justice Center  
200 Lewis Avenue  
Las Vegas, NV 89155

**NOTE: When service is by publication, add a brief statement of the object of the action. See Nevada Rules of Civil Procedure 4(b).**

**AFFIDAVIT OF SERVICE**

STATE OF \_\_\_\_\_ )  
 ) ss:  
COUNTY OF \_\_\_\_\_ )

\_\_\_\_\_, being duly sworn, says: That at all times herein affiant was and is over 18 years of age, not a party to nor interested in the proceeding in which this affidavit is made. That affiant received \_\_\_\_\_ copy(ies) of the Summons and Complaint, \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ and served the same on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ by:

**(Affiant must complete the appropriate paragraph)**

1. Delivering and leaving a copy with the Defendant \_\_\_\_\_ at (state address) \_\_\_\_\_
2. Serving the Defendant \_\_\_\_\_ by personally delivering and leaving a copy with \_\_\_\_\_, a person of suitable age and discretion residing at the Defendant's usual place of abode located at (state address) \_\_\_\_\_

**[Use paragraph 3 for service upon agent, completing (a) or (b)]**

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☐ Registered mail, return receipt requested

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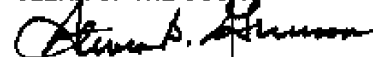
addressed to the Defendant \_\_\_\_\_ at Defendant's last known address which is  
(state address) \_\_\_\_\_

I declare under penalty of perjury under the law of the State of Nevada that the  
foregoing is true and correct.

EXECUTED this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Signature of person making service

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Steven D. Grierson  
CLERK OF THE COURT



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DISTRICT COURT

CLARK COUNTY, NEVADA

Plaintiff(s),

-vs-

Defendant(s).

CASE NO.

DEPT. NO.

### SUMMONS - CIVIL

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STEVEN D. GRIERSON  
CLERK OF COURT

Submitted by:

By: \_\_\_\_\_  
Deputy Clerk                      Date

Regional Justice Center  
200 Lewis Avenue  
Las Vegas, NV 89155

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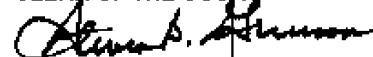
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\_\_\_\_\_  
Signature of person making service



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DISTRICT COURT

CLARK COUNTY, NEVADA

Plaintiff(s),

CASE NO.

-vs-

DEPT. NO.

Defendant(s).

16

# **SUMMONS - CIVIL**

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STEVEN D. GRIERSON  
CLERK OF COURT

Submitted by:

By: \_\_\_\_\_  
Deputy Clerk                      Date

Regional Justice Center  
200 Lewis Avenue  
Las Vegas, NV 89155

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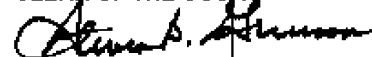
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I declare under penalty of perjury under the law of the State of Nevada that the  
foregoing is true and correct.

EXECUTED this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Signature of person making service

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CLERK OF THE COURT



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DISTRICT COURT  
CLARK COUNTY, NEVADA

Plaintiff(s),

-vs-

Defendant(s).

CASE NO.

DEPT. NO.

**SUMMONS - CIVIL**

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CLERK OF COURT

Submitted by:

By: \_\_\_\_\_  
Deputy Clerk                      Date

Regional Justice Center  
200 Lewis Avenue  
Las Vegas, NV 89155

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                                      ) ss:  
COUNTY OF                )

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3. Serving the Defendant \_\_\_\_\_ by personally delivering and leaving a copy at (state address) \_\_\_\_\_
  - (a) With \_\_\_\_\_ as \_\_\_\_\_, an agent lawfully designated by statute to accept service of process;
  - (b) With \_\_\_\_\_, pursuant to NRS 14.020 as a person of suitable age and discretion at the above address, which address is the address of the resident agent as shown on the current certificate of designation filed with the Secretary of State.
4. Personally depositing a copy in a mail box of the United States Post Office, enclosed in a sealed envelope, postage prepaid (Check appropriate method):

☐ Ordinary mail  
☐ Certified mail, return receipt requested  
☐ Registered mail, return receipt requested

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addressed to the Defendant \_\_\_\_\_ at Defendant's last known address which is  
(state address) \_\_\_\_\_

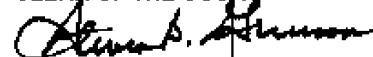
I declare under penalty of perjury under the law of the State of Nevada that the  
foregoing is true and correct.

EXECUTED this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Signature of person making service



Electronically Filed  
10/2/2020 5:32 PM  
Steven D. Grierson  
CLERK OF THE COURT



1 **SUMM**

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DISTRICT COURT

CLARK COUNTY, NEVADA

Plaintiff(s),

CASE NO.

-vs-

DEPT. NO.

Defendant(s).

16

# **SUMMONS - CIVIL**

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19

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.**

20

21

**TO THE DEFENDANT(S):** A civil Complaint has been filed by the Plaintiff(s) against you for the relief set forth in the Complaint.

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1. If you intend to defend this lawsuit, within 20 days after this Summons is served on you, exclusive of the day of service, you must do the following:
  - (a) File with the Clerk of this Court, whose address is shown below, a formal written response to the Complaint in accordance with the rules of the Court, with the appropriate filing fee.
  - (b) Serve a copy of your response upon the attorney whose name and address is shown below.

SUMM Civil/7/23/2009

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- 2. Unless you respond, your default will be entered upon application of the Plaintiff(s) and failure to so respond will result in a judgment of default against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.
- 3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.
- 4. The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislators each have 45 days after service of this Summons within which to file an Answer or other responsive pleading to the Complaint.

STEVEN D. GRIERSON  
CLERK OF COURT

Submitted by:

By: \_\_\_\_\_  
Deputy Clerk                      Date

Regional Justice Center  
200 Lewis Avenue  
Las Vegas, NV 89155

**NOTE: When service is by publication, add a brief statement of the object of the action. See Nevada Rules of Civil Procedure 4(b).**

**AFFIDAVIT OF SERVICE**

STATE OF \_\_\_\_\_ )  
COUNTY OF \_\_\_\_\_ ) ss:

\_\_\_\_\_, being duly sworn, says: That at all times herein affiant was and is over 18 years of age, not a party to nor interested in the proceeding in which this affidavit is made. That affiant received \_\_\_\_\_ copy(ies) of the Summons and Complaint, \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ and served the same on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ by:

**(Affiant must complete the appropriate paragraph)**

1. Delivering and leaving a copy with the Defendant \_\_\_\_\_ at (state address) \_\_\_\_\_
2. Serving the Defendant \_\_\_\_\_ by personally delivering and leaving a copy with \_\_\_\_\_, a person of suitable age and discretion residing at the Defendant's usual place of abode located at (state address) \_\_\_\_\_

**[Use paragraph 3 for service upon agent, completing (a) or (b)]**

3. Serving the Defendant \_\_\_\_\_ by personally delivering and leaving a copy at (state address) \_\_\_\_\_
  - (a) With \_\_\_\_\_ as \_\_\_\_\_, an agent lawfully designated by statute to accept service of process;
  - (b) With \_\_\_\_\_, pursuant to NRS 14.020 as a person of suitable age and discretion at the above address, which address is the address of the resident agent as shown on the current certificate of designation filed with the Secretary of State.

4. Personally depositing a copy in a mail box of the United States Post Office, enclosed in a sealed envelope, postage prepaid (Check appropriate method):

- ☐ Ordinary mail  
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addressed to the Defendant \_\_\_\_\_ at Defendant's last known address which is  
(state address) \_\_\_\_\_

I declare under penalty of perjury under the law of the State of Nevada that the  
foregoing is true and correct.

EXECUTED this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Signature of person making service



1 CNND

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

4  
5 Alla Zorikova, Plaintiff(s)

A-20-821249-C

6  
7 vs.

Department 20

8 Julie Pyle, Defendant(s)

9  
10 **CLERK'S NOTICE OF NONCONFORMING DOCUMENTS**

11  
12 Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, notice is  
13 hereby provided that the following electronically filed documents do not conform to the  
14 applicable filing requirements:

15 Titles of Nonconforming Documents:

(4) Summons - Civil

16 Party Submitting Documents for Filing:

Plaintiff

17  
18 10/02/2020 at 4:43 PM

19 10/02/2020 at 5:04 PM

20 Date(s) and Time(s) Submitted for Electronic  
21 Filing:

10/02/2020 at 5:30 PM

10/02/2020 at 5:32 PM

22 Reason for Nonconformity Determination:

- 23 ☐ The document filed to commence an action is not a complaint, petition,  
24 application, or other document that initiates a civil action. *See* Rule 3 of the  
25 Nevada Rules of Civil Procedure. In accordance with Administrative Order 19-5,  
26 the submitted document is stricken from the record, this case has been closed and  
27 designated as filed in error, and any submitted filing fee has been returned to the  
28 filing party.

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- ☐ The document initiated a new civil action and a cover sheet was not submitted as required by NRS 3.275.
- ☒ The documents were not signed by the submitting party or counsel for said party. The fillable field forms on the documents appear to be blank.
- ☐ The document filed was a court order that did not contain the signature of a judicial officer. In accordance with Administrative Order 19-5, the submitted order has been furnished to the department to which this case is assigned.
- ☐ Motion does not have a hearing designation per Rule 2.20(b). Motions must include designation “Hearing Requested” or “Hearing Not Requested” in the caption of the first page directly below the Case and Department Number.

Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, a nonconforming document may be cured by submitting a conforming document. All documents submitted for this purpose must use filing code “**Conforming Filing – CONFILE**.” Court filing fees will not be assessed for submitting the conforming document. Processing and convenience fees may still apply.

Dated this: 6th day of October, 2020

By:           /s/ Chaunte Pleasant            
Deputy District Court Clerk

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 06, 2020, I concurrently filed and served a copy of the foregoing Clerk’s Notice of Nonconforming Document, on the party that submitted the nonconforming document, via the Eighth Judicial District Court’s Electronic Filing and Service System.

By:       /s/ Chaunte Pleasant        
Deputy District Court Clerk



1 Alla Zorikova  
2 1905 Wilcox Av., #175  
3 Los Angeles, CA 90068  
4 3232095186  
5 Olivia.car@mail.ru

**EIGHT JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

7 ALLA ZORIKOVA,  
8  
9 Plaintiff,

Case No.: A-20-821249-C

10 vs.

11 JULIE PYLE, TAMMY WILLET, CASEY  
12 GISH, VEGAS SHEPHERD RESCUE AND  
13 DOES I THROUGH X, INDIVIDUALS, AND  
14 ROE BUSINESS ENTITIES I THROUGH X,

Defendants

EX PARTE APPLICATION FOR  
TEMPORARY RESTRAINING ORDER  
FROM CUSTODY OF PLAINTIFF'S DOGS  
AND FOR ORDER TO RETURN  
PLAINTIFF'S DOGS AND PLAINTIFF'S  
DECLARATION IN SUPPORT

15 No Notice provided to Defendants based on precedent of their violent actions they committed  
16 toward the Dogs and property owners.

17 If Notice would be given, Defendants would accelerate destruction of the stolen from Plaintiff  
18 dogs and possibly again trespass Plaintiff's property and attack Plaintiff.

20 I. STATEMENT OF FACTS

- 21 1. Plaintiff's business website is <http://vonmarkgrafgermanshepherds.us>
- 22 2. Defendants and each of them had stolen from Plaintiff's private property  
23 dozens of Top World class German shepherds value over \$1,000,000 on about  
24 August 09 of 2020.
- 25 3. This criminal act allegedly organized by Bryan Pease and Defendant Casey  
26 Gish, while dogs were delivered into possession of Defendant and each of  
27 them.

28 EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S  
DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN  
SUPPORT - 1



4. Stolen Dogs were trafficked to Las Vegas, Nevada by SNARL, Vegas Shepherd Rescue, the organizations where Defendant Casey Gish has ownership.
5. No legitimate authorization by sheriff department was never provided to thieves to trespass Plaintiff's private property and steal Plaintiff's dogs.
6. Animal control arrived multiple times on Plaintiff's property following harassing phone calls requests made by Bryan Pease and Defendant Casey Gish with false allegations stated against Plaintiff.
7. Every time, when Animal Control personnel visited Plaintiff's property, they found Plaintiff's dogs in great health, not distressed, all dogs having water, shelter (Attachment 1).
8. NO violations have been found by Animal Control.
9. San Bernardino Sheriff department conducts criminal investigation with case number assigned for the stolen dogs led by Detective J Guerry.
10. This criminal investigation was escalated to San Bernardino County Detectives.
11. Deputy Parsons of Barstow Sheriff Station is now under criminal investigation by San Bernardino Sheriff's Internal Affairs for conspiracy with thieves, as she conducted Plaintiff's unwarranted false arrest on August 08 of 2020 and Parsons not while on duty allegedly called to Defendants on about August 09 of 2020 with statement that there are dogs on private property, that she had arrested/removed the owners and the dogs are available for pick up and sale.
12. NO charges have been ever filed against Plaintiff.
13. Plaintiff is the lawful owner of Private Property at 13350 Trump Blvd., Barstow, CA 92311 via Grant Deed, 10 acres property paid fully in cash.
14. Plaintiff had applied for new residential permit and other permits starting from January of 2020 or about that time and currently in process of completing the permit.

EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN SUPPORT - 2

15. The aggressive actions of Defendants “animal rights activists” directed against dog breeders as whole and pet owners.
16. Defendants admitted multiple times that the stolen dogs in their possession are died, spayed or neutered and altered otherwise.
17. There were 13 young puppies aged 3 to 5 month old that could not be altered so far.
18. There were pregnant females that had to deliver puppies in October of 2020 and also could not be spayed so far.
19. The stolen dogs are important breeding stock for the USA and World wide and to safe them is in PUBLIC INTEREST.
20. The stolen dogs have been selectively bred for years toward protective qualities, loyalty to family, super natural health and other important for German Shepherd breed characteristics. Plaintiff’s Dogs were Sired by Top German VA studs and loss of these dogs impacts not only CA breeding stock but the whole world.
21. There is inevitable irreparable harm will be done to the stolen dogs by Defendant if the dogs are not returned immediately to the Plaintiff.
22. Dogs are the private property.
23. Defendants are now admitting possession of the Plaintiff’s dogs based on the undisputable evidences introduced by Animal Control officers and San Bernardino Sheriff’s Department.
24. However, Defendants are attempting to make the defense that the Plaintiff cannot keep the Dogs and therefore Defendants do not have to return stolen dogs.
25. Half of the stolen Dogs have been sold with deposits advanced toward them BEFORE they were stolen and upon return to Plaintiff they have to be picked up by the new owners.
26. Some other stolen Dogs has been planned to be shipped to Europe for training and breeding purpose.

EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF’S DOGS AND FOR ORDER TO RETURN PLAINTIFF’S DOGS AND PLAINTIFF’S DECLARATION IN SUPPORT - 3

- 1 27. In addition to the above, Plaintiff's Dogs will enjoy 400 acres outstanding  
2 private ranch with 41+ dogs kennel license.
- 3 28. There is war on breeders and pet owners in USA led by Ingrid Newkirk,  
4 Bryan Pease, Casey Gish and other "animal rights activists" masked by this  
5 misleading public name, while real agenda is to destroy breeding stock in  
6 USA.
- 7 29. See [https://protectharvest.com/news/petas-ingrid-newkirk-order-stealing-](https://protectharvest.com/news/petas-ingrid-newkirk-order-stealing-killing-pets/)  
8 [killing-pets/](https://protectharvest.com/news/petas-ingrid-newkirk-order-stealing-killing-pets/)
- 9 30. Unfortunately, this is NOT the first time people's private property trespassed,  
10 owners are hurt and dogs are stolen and destroyed. This violence and harm to  
11 the pet owners and the Dogs must be stopped. Criminals must be prosecuted.
- 12 31. First thing thieves do is surgically remove dog's microchips.
- 13 32. However, each Plaintiff's Dog has DNA traceable as Sired by the Dogs which  
14 DNA has been recorded.
- 15 33. Plaintiff will have irreparable injury and harm if the stolen Dogs not returned  
16 to her by Defendants.
- 17 34. Plaintiff is likely to succeed on the merits of the case
- 18 35. Plaintiff is to suffer irreparable harm in the absence of preliminary relief;
- 19 36. The balance of equities tips in Plaintiff's favor;
- 20 37. The request for enjoying Defendants from custody of Plaintiff's Dogs and  
21 to return the Dogs immediately to Plaintiff is in the public interest.

## 22 II. LEGAL STANDARDS

23 38. The standard for issuing a temporary restraining order is "substantially  
24 identical" to the standard for issuing a preliminary injunction. (Washington v.  
25 Trump, 847 F.3d 1151, 1159 n.3 (9th Cir. 2017) (quoting Stuhlberg Int'l Sales  
26 Co., Inc. v. John D. Brush & Co., Inc., 240 F.3d 832, 839 n.7 (9th Cir. 2001)). A  
27 preliminary injunction is "a device for preserving the status quo and preventing  
28 the irreparable loss of rights before judgment." Sierra On-Line, Inc. v. Phoenix  
Software, Inc., 739 F.2d 1415, 1422 (9th Cir. 1984).

1 39. In *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7 (2008), the Supreme  
2 Court held that a plaintiff seeking a preliminary injunction must establish “[1]  
3 that he is likely to succeed on the merits, [2] that he is likely to suffer irreparable  
4 harm in the absence of preliminary relief, [3] that the balance of equities tips in  
5 his favor, and [4] that an injunction is in the public interest.” (Id. at 20.)

6 40. The Ninth Circuit balances these factors using a “sliding scale” approach,  
7 where “a stronger showing of one element may offset a weaker showing of  
8 another.” *All. for the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1131 (9th Cir.  
2011).

9 41. Ex parte relief is reserved for the most emergent circumstances. See  
10 *Mission Power Eng’g Co. v. Cont’l Cas. Co.*, 883 F.Supp. 488 (C.D. Cal. 1995).  
11 These procedures should be used sparingly because they bypass the rules that  
12 ensure decisions are fairly made on the merits, to the detriment of the adverse  
13 party. Consistent with this general doctrine, “courts have recognized very few  
14 circumstances justifying the issuance of an ex parte [temporary restraining order  
15 (“TRO”)].” *Reno Air Racing Ass’n, Inc. v. McCord*, 452 F.3d 1126, 1131 (9th  
16 Cir. 2006).

17 42. A party seeking a TRO bears the burden of establishing four essential  
18 elements: 1) she is likely to succeed on the merits of the case; 2) she is likely to  
19 suffer irreparable harm in the absence of preliminary relief; 3) that the balance of  
20 equities tips in her favor; and, 4) that the request is in the public interest. *Winter*  
*v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008).

21 43. the Ninth Circuit uses a “sliding scale” approach to give varied weight to  
22 each factor depending on the circumstances of each case, a moving party must  
23 still make an adequate evidentiary showing on all four of these elements before a  
24 TRO may be issued. *Alliance for the Wild Rockies v. Cottrell*, 632 F.3d 1127,  
1135 (9th Cir. 2011).


25 44. Defendant Lamey failed to establish each and every required element  
26 pointed above and therefore is not entitled Application to be granted.

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3 III. CONCLUSION

4 If the German Shepherd Dogs are not returned immediately to Plaintiff,  
5 Plaintiff, Dogs and PUBLIC will suffer inevitable and irreparable harm;  
6 therefore, Plaintiff respectfully asks this Court:

- 7 a). to grant Temporary Restraining Order to enjoin Defendants and each of  
8 them from custody of Plaintiff's Dogs and for the order to return immediately  
9 all German Shepherd Dogs and puppies arrived to Defendants on August 09 to  
10 September 09 from San Bernardino County, Barstow area, particularly  
11 Malibu, Baker, Beacon, Cypress, Lodi etc (Attachment 2-9) and all others.  
12 b). To order DNA sample test be taken by Plaintiff of each German shepherd  
13 dog and puppies that were in possession of Defendants, and each of them,  
14 from August 09 to September 09 of 2020 even those dogs were sold, given for  
15 adoption or disposed.  
16 c). To return to Plaintiff all newborn puppies whelped from stolen Plaintiff's  
17 female german shepherds.  
18 d). To enjoin Defendants and each of them from possessing, killing, selling,  
19 disposing, giving for adoption, spaying or neutering Plaintiff's German  
20 Shepherds that they received in August or September of 2020 from California.  
21 e). To order pick up of the Dogs by Plaintiff from Las Vegas not later than 3  
22 days after Court's order issued.  
23 f) to arrange pick up of the Dogs by Defendants via contacting Plaintiff on  
24 323-209-5186 and via email olivia.car@mail.ru with date, time and address  
25 for pick up.

26 Dated: October 24 of 2020

1  
2 Respectfully submitted, ALLA ZORIKOVA 

3  
4 PLAINTIFF'S DECLARATION IN SUPPORT OF Plaintiff's ex parte  
5 application of TOR.  
6

7 I, Alla Zorikova, under penalty of perjury and in best of my knowledge declare  
8 the following:  
9

10 1. I will have irreparable injury and harm if the stolen Dogs not  
11 returned to her by Defendants.

12 2. I am to suffer irreparable harm in the absence of preliminary relief;

13 3. The request to enjoin Defendants from custody of my Dogs and to  
14 return the Dogs immediately to me is in the public interest.

15 4. Defendants and each of them had stolen from my private property  
16 dozens of Top World class German shepherds value over \$1,000,000 on  
17 about August 09 of 2020.

18 5. This criminal act allegedly organized by Bryan Pease and  
19 Defendant Casey Gish.

20 6. Stolen Dogs were trafficked to Las Vegas, Nevada by SNARL,  
21 Vegas Shepherd Rescue, the organizations where Casey Gish has  
22 ownership.

23 7. No legitimate authorization by sheriff department was never  
24 provided to thieves to trespass my private property and steal my dogs.

25 8. Animal control arrived multiple times on my property following  
26 harassing phone calls requests made by Bryan Pease and Casey Gish with  
27 false allegations stated against me.

28 EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S  
DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN  
SUPPORT - 7

1 9. Every time, when Animal Control personnel visited my property,  
2 they found my dogs in great health, not distress, all dogs having water,  
3 shelter (Attachment 1).

4 10. NO violations have been found by Animal Control.

5 11. San Bernardino Sheriff department conducts criminal investigation  
6 with case number assigned for the stolen dogs.

7 12. This criminal investigation was escalated to San Bernardino  
8 County Detectives.

9 13. Deputy Parsons of Barstow Sheriff Station is now under criminal  
10 investigation by San Bernardino Sheriff's Internal Affairs for conspiracy  
11 with thieves, as she conducted my unwarranted false arrest on August 08  
12 of 2020 and who allegedly called to Defendants on about August 09 of  
13 2020 with statement that there are dogs on private property, that she had  
14 arrested/removed the owners and the dogs are available for pick up and  
15 sale.

16 14. NO charges have been ever filed against me.

17 15. I am the lawful owner of Private Property at 13350 Trump Blvd.,  
18 Barstow, CA 92311 via Grant Deed, property paid fully in cash.

19 16. I had applied for new residential permit and other permits starting  
20 from January of 2020 or about that time and currently in process of  
21 completing the permit.

22 17. Defendants admitted multiple times that the stolen dogs in their  
23 possession are died, spayed or neutered and altered otherwise.

24 18. There were 13 young puppies aged 3 to 5 month old that could not  
25 be altered so far.

26 19. There were pregnant females that had to deliver puppies and also  
27 could not be spayed so far.

28 20. The stolen dogs are important breeding stock for the USA and  
World wide.

EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S  
DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN  
SUPPORT - 8

1 21. The stolen dogs have been selectively bred for years toward  
2 protective qualities, loyalty to family, super natural health and other  
3 characteristics. They were Sired by Top German VA studs and loss of  
4 these dogs impacts not only CA breeding stock but the whole world.

5 22. There is inevitable irreparable harm will be done to the stolen dogs  
6 by Defendant if the dogs are not returned immediately to me.

7 23. Half of the stolen Dogs have been sold with deposits advanced  
8 toward them BEFORE they were stolen and upon return they have to be  
9 picked up by the new owners.

10 24. Some other stolen Dogs has been planned to be shipped to Europe  
11 for training and breeding purpose.

12 25. In addition to the above, Plaintiff's Dogs will enjoy 400 acres  
13 outstanding private ranch with 41+ dogs kennel license.

14 26. Each my Dog has DNA traceable as Sired by the Dogs which DNA  
15 recorded.

16 I declare under penalty of perjury that the foregoing is true and correct and  
17 that this declaration was executed in San Bernardino county, CA.

18 

19 Alla Zorikova  
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22 ATTACHMENT 1 p1  
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28 EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S  
DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN  
SUPPORT - 9



A20-172252-1 ASSIST/POLICE Priority Level: 3 Total Animals: 20 Animal Type: DO  
Activity Address: LOCKHART RD RED MOUNTAIN  
Activity Comment: O-67 87 W/ DEP ALEXANDER. WILL DIRECT TO ADDRESS FOR ASSIST. LOG# BA022

Caller Information:

Result Codes:  
1 RSVLD

Officer: P999067 CHAVEZ Clerk: B4869

Call Date: 08/08/20 02:02 PM  
New Date: 08/08/20 02:02 PM  
Dispatch Date: 08/08/20 02:30 PM  
Working Date: 08/08/20 04:13 PM  
Complete Date: 08/08/20 04:21 PM

Memo:

08/17/20 Myself and O-94 MC with the owner and her daughter. The owner drove us to a Government owned spring where they get their water. She then walked us around the property and showed us all the dogs who all had water and shelter. She stated she picks up left over meat from Barstow Country Butcher daily for the dogs food. The address to the property is 1370 Trump Rd, but it does not come up on the map yet. I took pictures and put them in O-67 folder. H9045/0-85  
8/8/20 O-67 arrived to the call and said all dogs had water and shade. O-67 said all dogs were healthy and normal. He said there were 50+ dogs on the ppty and they all had water and shade in their cages. O-67 said the dog owner was going to be arrested for 597 due to the Deputy's not viewing water and shade. I told O-67 we weren't going to impound the dogs today. I told him to make sure the dogs have water and we will return on 8/9 to ensure the dogs still have water and aren't in distress, we hung up the phone. O-67 called me back asking about under age pups on the ppty. I asked to talk to an Officer on the ppty, the phone was handed to a SGT. I was unable to get his name due to the fact he was so upset we weren't impounding dogs. I listened to him about how he is leaving and didn't care what animal control does or doesn't do. I told O-67 to post the ppty and impound all under age pups that didn't have a mother. I called O-67 back to make sure SO knew ACC wouldn't pay for the cost of the dogs or any of the fees that incur. He put me on the phone with officer Parsons. I explained to her Sheriff Dpt will have to pay for all the cost of the dogs. She went on a rant about how she doesn't care she is only there to uphold her officer oath. I was able to explain to her we were not picking up 50+ dogs today and we would return each day to water and feed to ensure none of them go into distress, until we make arrangements to impound all 50+ dogs. B4869

8/8/20 I M/C with S/O and was able to see many dogs in plain view on property. The dogs were all large G. Sheps were in pens with shade cloth. All the G. sheps had shade and shelter all had little water. None of the dogs appear to be in distress and all appear to be healthy and normal, S/O and dog owner gave the dogs water. There were 12 pups unknown which of the female dogs was the mother. Per O-99/ O-90 the pups were to be impounded and the property is to be posted for 24 hr abandonment. I posted the front gate, side gate, and the little house/shack @ 16:20 for 48 G- Sheps per S/O they arrested dog owner for 597 animals in distress. ...pic in O-67 folder.....c3865

EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN SUPPORT - 10

1 Attachment 1 P2

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28 EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S  
DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN  
SUPPORT - 11

8/8/20 directions to the property.: hwy15 north to hwy 58 west, go north on Haper lake Rd for about 6.8 mi. you will then turn left on Hoffman Rd till paved rd. at end of paved rd go right for about 4.1 mi at the pole with blue ribbon go left for 0.1 mil first dirt rd go right for 0.8 mil then left at the red pole the prop will be to your right....c3865

08/09/20 I met with Dep Parson's and we fed and watered the dogs. All of O-67 notices were still up and the dogs were still on the property. I counted at least 63 dogs but they were hiding in the dens so it was hard to get a full count. I posted 7 ON next to O-67 advising abandonment for the 50+ dogs and 1 chicken. When I was leaving Dep Parsons had someone pulled over at Hoffman rd X Hoffman Rd and as I drove down Hoffman Rd to Harper Valley Lake rd and there was a lifted black Dodge Ram 2500 or 3500 with a man and a woman in it followed by a larger white van with German shep stickers on it. I tried to talk to them but they would not speak with me and drove East on Hoffman Rd. I did not get the lic plate numbers for the truck but I did get a partial plate on the van. The first 3 letters were "AKC". I was unable to take pictures as my camera was overheating and not working properly H9045/0-85

08/11/20 I took pictures and noticed a significant amount of dogs were missing and the chicken was gone. O-55/Stevens counted 25 dogs on the property. We impounded 1 dog that was stuck under fencing trying to get shade under a board. While pulling in Lt. Molina noticed goats on the North/East corner/side of the property line. I went to go check and there was a male Nigerian dwarf goat tied with a collar and chain to the ground as well as a Nubian/Alpine mix female goat who was also tied down by a collar and chain. Neither goat had food water or shelter. We put both goats in the truck and gave them water. 25 dogs and 2 goats where impounded in total. Lt Molina was then leaving the property and a white van with German shep stickers and advertising of rescues pulled up. Lt Molina asked why they were there and the woman stated this was the first time she was out here and Lt. Molina took down her lic plate which was "AKC GSD" and there was a phone number on the side of the van "909-297-6217". The woman would not give any more information and drove away. All pictures are in O-67 folder. h9045/0-85

DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN  
SUPPORT - 12

1 ATTACHMENT 3

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28 EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S  
DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN  
SUPPORT - 13

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FROM CUSTODY OF PLAINTIFF'S  
NTIFF'S DECLARATION IN

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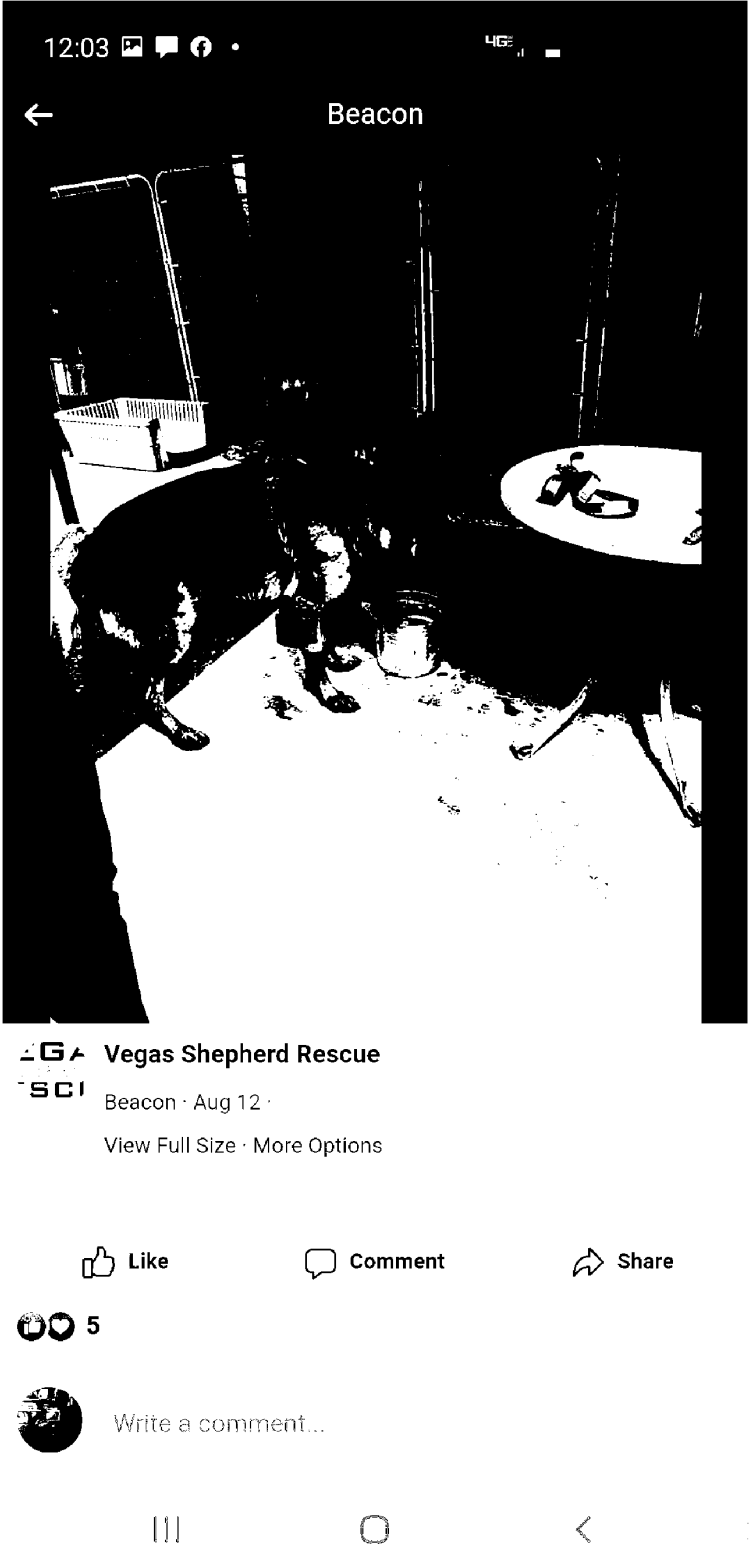
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28 EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S  
DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN  
SUPPORT - 15

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FROM CUSTODY OF PLAINTIFF'S  
NTIFF'S DECLARATION IN

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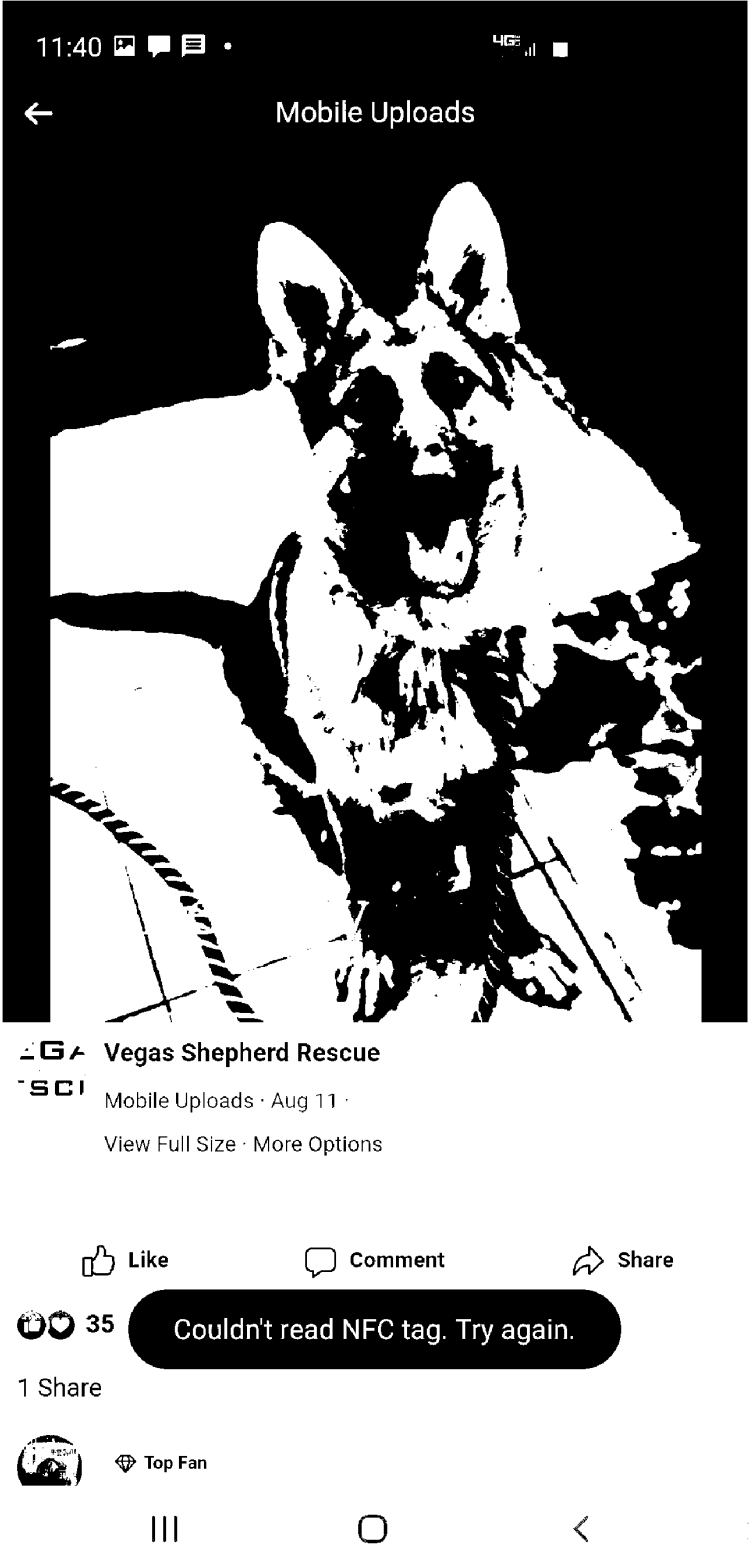
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28 EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S  
DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN  
SUPPORT - 17



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FROM CUSTODY OF PLAINTIFF'S  
NTIFF'S DECLARATION IN

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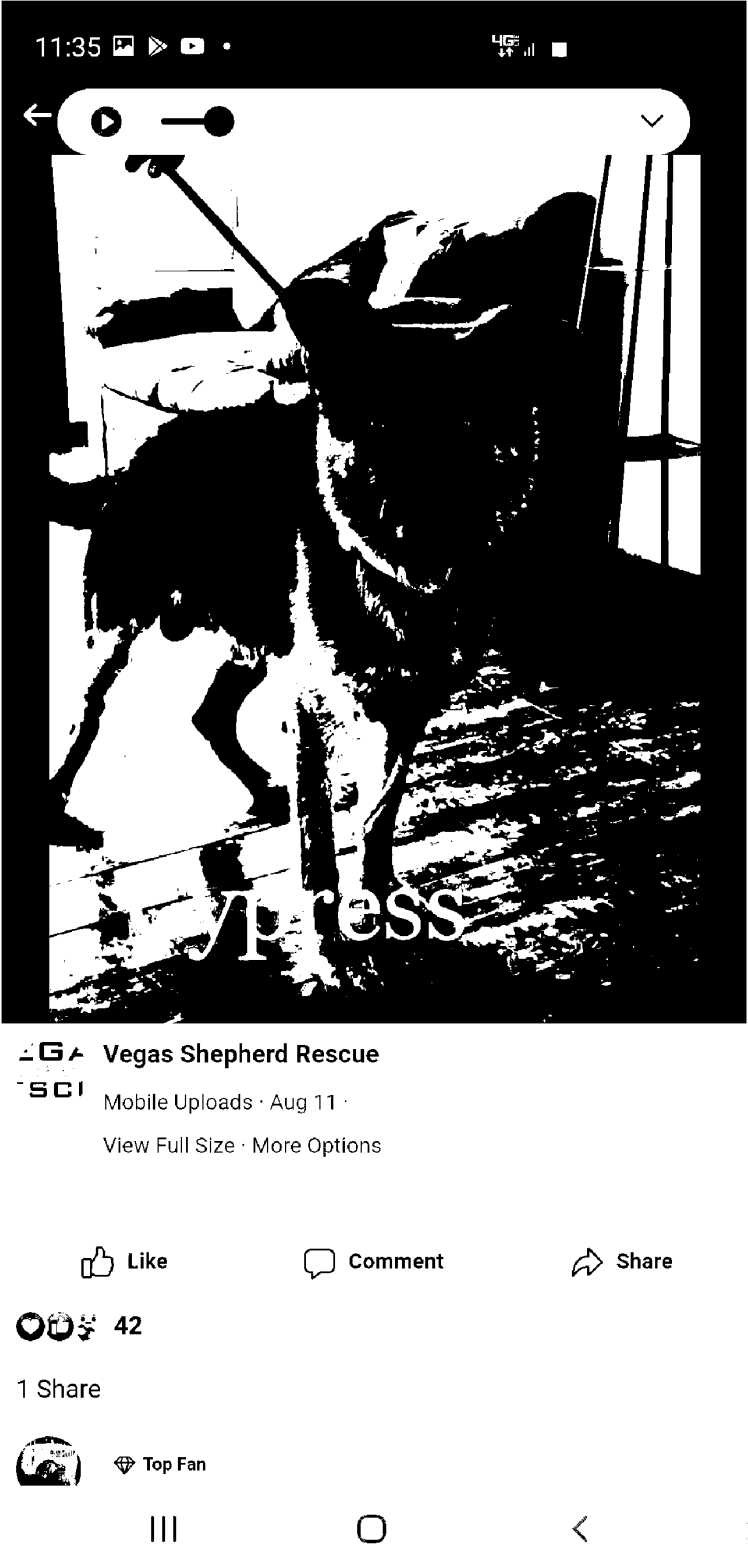
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28 EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S  
DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN  
SUPPORT - 19

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FROM CUSTODY OF PLAINTIFF'S  
NTIFF'S DECLARATION IN

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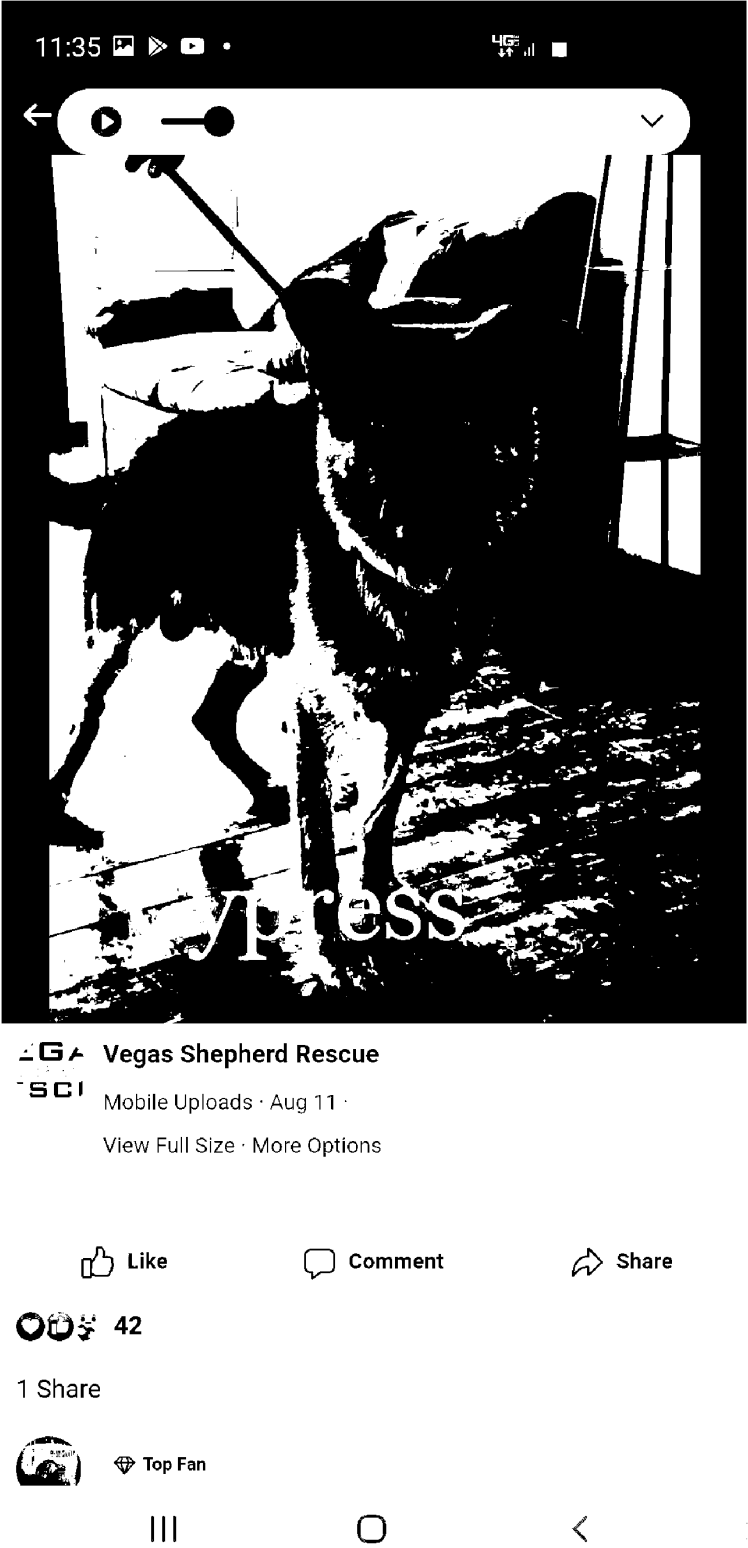
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28 EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S  
DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN  
SUPPORT - 21

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FROM CUSTODY OF PLAINTIFF'S  
NTIFF'S DECLARATION IN

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28 EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S  
DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN  
SUPPORT - 23

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FROM CUSTODY OF PLAINTIFF'S  
NTIFF'S DECLARATION IN

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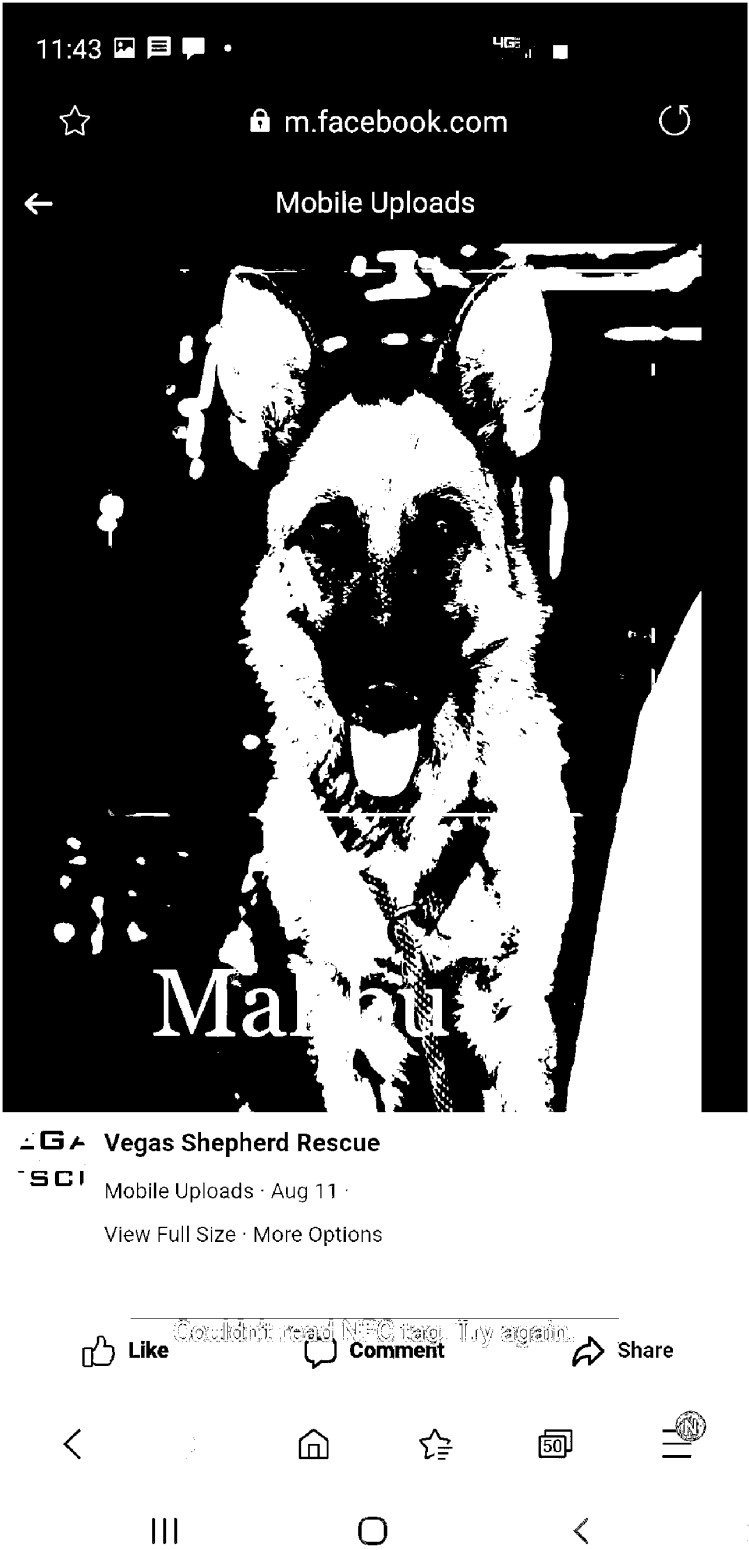
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28 EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S  
DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN  
SUPPORT - 25



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FROM CUSTODY OF PLAINTIFF'S  
NTIFF'S DECLARATION IN

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28 EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S  
DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN  
SUPPORT - 27

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FROM CUSTODY OF PLAINTIFF'S  
NTIFF'S DECLARATION IN



DMSC  
CASEY D. GISH, ESQ.  
Nevada Bar No. 006657  
**THE LAW OFFICE OF CASEY D. GISH**  
5940 S. Rainbow Blvd  
Las Vegas, NV 89118  
Casey@GishLawFirm.com  
(702) 583-5883 Telephone  
(702) 483-4608 Facsimile  
*Attorney for Defendants Julie Pyle, Tammy  
Willet, & Vegas Shepherd Rescue*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ALLA ZORIKOVA;

Plaintiff(s),

vs.

JULIE PYLE, TAMMY WILLET, VEGAS  
SHEPHERD RESCUE AND DOES I  
THROUGH X, INDIVIDUALS, AND ROE  
BUSINESS ENTITIES I THROUGH X,

Defendant(s).

CASE NO. A-20-821249-C

DEPT. NO. XX

**DEFENDANT, JULIE PYLE'S  
DEMAND FOR SECURITY OF COSTS**

NOTICE IS HEREBY GIVEN pursuant to N.R.S. 18.130 that Defendant, Julie Pyle, an individual defendant in the above-entitled case, hereby demands and requests security from ALLA ZORIKOVA, Plaintiff, a non-resident of this state, for defendant's costs and charges which may be awarded herein against Plaintiff in the sum of Five Hundred Dollars (\$500.00).

DATED this 26<sup>th</sup> day of October, 2020.

**THE LAW OFFICE OF CASEY D. GISH**

/s/ Casey D. Gish

CASEY D. GISH, ESQ.

Nevada Bar No. 006657

5940 S. Rainbow Blvd

Las Vegas, NV 89118

Casey@GishLawFirm.com

*Attorney for Defendants Julie Pyle, Tammy  
Willet, & Vegas Shepherd Rescue*

CERTIFICATE OF SERVICE

I, Casey D. Gish, declare:

I am a resident of and employed in Clark County, Nevada. I am over the age of eighteen (18) years and not a party to the action within. My business address is 5940 S. Rainbow Blvd., Las Vegas, Nevada 89118.

That I served the document described as **DEFENDANT, JULIE PYLE'S DEMAND FOR SECURITY OF COSTS** on the parties whose address appears below:

X VIA U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States Postal Service at Las Vegas, Nevada. I am "readily familiar" with the firm's practice of collection and processing correspondence by mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business.

X VIA ELECTRONIC SERVICE: in accordance with FRCP 5 through the CM/ECF electronic filing system. I am "readily familiar" with the firm's practice of electronically serving documents.

X VIA EMAIL: in accordance to the Consent of Service by Electronic Means on file herein. Via email by transmitting through an email service maintained by the person on whom it is served at the email address provided by that person. The copy of the document served by email bears a notation of the date and time of transmission and the email address to which transmitted.

ALLA ZORIKOVA  
1905 Wilcox Ave, #175  
Los Angeles. CA 90068  
P: (323) 209-5186  
E: olivia.car@mail.ru  
*Plaintiff*

Executed on the 26<sup>th</sup> day of October, 2020.

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5940 S. Rainbow Blvd, Las Vegas, NV 89118  
Phone (702) 583-5883 Fax (702) 483-4608  
Email Casey@GishLawFirm.com



*/s/ Casey D. Gish*  
An employee of THE LAW OFFICE OF  
CASEY D. GISH



DMSC

CASEY D. GISH, ESQ.

Nevada Bar No. 006657

**THE LAW OFFICE OF CASEY D. GISH**

5940 S. Rainbow Blvd

Las Vegas, NV 89118

Casey@GishLawFirm.com

(702) 583-5883 Telephone

(702) 483-4608 Facsimile

*Attorney for Defendants Julie Pyle, Tammy*

*Willet, & Vegas Shepherd Rescue*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ALLA ZORIKOVA;

Plaintiff(s),

vs.

JULIE PYLE, TAMMY WILLET, VEGAS  
SHEPHERD RESCUE AND DOES I  
THROUGH X, INDIVIDUALS, AND ROE  
BUSINESS ENTITIES I THROUGH X,

Defendant(s).

CASE NO. A-20-821249-C

DEPT. NO. XX

**DEFENDANT, TAMMY WILLET'S  
DEMAND FOR SECURITY OF COSTS**

NOTICE IS HEREBY GIVEN pursuant to N.R.S. 18.130 that Defendant, Tammy Willet, an individual defendant in the above-entitled case, hereby demands and requests security from ALLA ZORIKOVA, Plaintiff, a non-resident of this state, for defendant's costs and charges which may be awarded herein against Plaintiff in the sum of Five Hundred Dollars (\$500.00).

DATED this 26<sup>th</sup> day of October, 2020.

**THE LAW OFFICE OF CASEY D. GISH**

/s/ Casey D. Gish

CASEY D. GISH, ESQ.

Nevada Bar No. 006657

5940 S. Rainbow Blvd

Las Vegas, NV 89118

Casey@GishLawFirm.com

*Attorney for Defendants Julie Pyle, Tammy  
Willet, & Vegas Shepherd Rescue*



CERTIFICATE OF SERVICE

I, Casey D. Gish, declare:

I am a resident of and employed in Clark County, Nevada. I am over the age of eighteen (18) years and not a party to the action within. My business address is 5940 S. Rainbow Blvd., Las Vegas, Nevada 89118.

That I served the document described as **DEFENDANT, TAMMY WILLET'S DEMAND FOR SECURITY OF COSTS** on the parties whose address appears below:

X VIA U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States Postal Service at Las Vegas, Nevada. I am "readily familiar" with the firm's practice of collection and processing correspondence by mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business.

X VIA ELECTRONIC SERVICE: in accordance with FRCP 5 through the CM/ECF electronic filing system. I am "readily familiar" with the firm's practice of electronically serving documents.

X VIA EMAIL: in accordance to the Consent of Service by Electronic Means on file herein. Via email by transmitting through an email service maintained by the person on whom it is served at the email address provided by that person. The copy of the document served by email bears a notation of the date and time of transmission and the email address to which transmitted.

ALLA ZORIKOVA  
1905 Wilcox Ave, #175  
Los Angeles. CA 90068  
P: (323) 209-5186  
E: olivia.car@mail.ru  
*Plaintiff*

Executed on the 26<sup>th</sup> day of October, 2020.



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Email Casey@GishLawFirm.com



*/s/ Casey D. Gish*  
An employee of THE LAW OFFICE OF  
CASEY D. GISH



DMSC

CASEY D. GISH, ESQ.

Nevada Bar No. 006657

**THE LAW OFFICE OF CASEY D. GISH**

5940 S. Rainbow Blvd

Las Vegas, NV 89118

Casey@GishLawFirm.com

(702) 583-5883 Telephone

(702) 483-4608 Facsimile

*Attorney for Defendants Julie Pyle, Tammy*

*Willet, & Vegas Shepherd Rescue*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ALLA ZORIKOVA;

Plaintiff(s),

vs.

JULIE PYLE, TAMMY WILLET, VEGAS  
SHEPHERD RESCUE AND DOES I  
THROUGH X, INDIVIDUALS, AND ROE  
BUSINESS ENTITIES I THROUGH X,

Defendant(s).

CASE NO. A-20-821249-C

DEPT. NO. XX

**DEFENDANT, VEGAS SHEPHERD  
RESCUE'S DEMAND FOR SECURITY  
OF COSTS**

NOTICE IS HEREBY GIVEN pursuant to N.R.S. 18.130 that Defendant, Vegas Shepherd Rescue, a Nevada State Registered Non-Profit Organization defendant in the above-entitled case, hereby demands and requests security from ALLA ZORIKOVA, Plaintiff, a non-resident of this state, for defendant's costs and charges which may be awarded herein against Plaintiff in the sum of Five Hundred Dollars (\$500.00).

DATED this 26<sup>th</sup> day of October, 2020.

**THE LAW OFFICE OF CASEY D. GISH**

*/s/ Casey D. Gish*

CASEY D. GISH, ESQ.

Nevada Bar No. 006657

Casey@GishLawFirm.com

*Attorney for Defendants Julie Pyle, Tammy  
Willet, & Vegas Shepherd Rescue*



**CERTIFICATE OF SERVICE**

I, Casey D. Gish, declare:

I am a resident of and employed in Clark County, Nevada. I am over the age of eighteen (18) years and not a party to the action within. My business address is 5940 S. Rainbow Blvd., Las Vegas, Nevada 89118.

That I served the document described as **DEFENDANT, VEGAS SHEPHERD RESCUE'S DEMAND FOR SECURITY OF COSTS** on the parties whose address appears below:

  X   VIA U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States Postal Service at Las Vegas, Nevada. I am "readily familiar" with the firm's practice of collection and processing correspondence by mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business.

  X   VIA ELECTRONIC SERVICE: in accordance with FRCP 5 through the CM/ECF electronic filing system. I am "readily familiar" with the firm's practice of electronically serving documents.

  X   VIA EMAIL: in accordance to the Consent of Service by Electronic Means on file herein. Via email by transmitting through an email service maintained by the person on whom it is served at the email address provided by that person. The copy of the document served by email bears a notation of the date and time of transmission and the email address to which transmitted.

ALLA ZORIKOVA  
1905 Wilcox Ave, #175  
Los Angeles. CA 90068  
P: (323) 209-5186  
E: olivia.car@mail.ru  
*Plaintiff*

Executed on the 26<sup>th</sup> day of October, 2020.

*/s/ Casey D. Gish*

An employee of THE LAW OFFICE OF  
CASEY D. GISH

5940 S. Rainbow Blvd, Las Vegas, NV 89118  
Phone (702) 583-5883 Fax (702) 483-4608  
Email Casey@GishLawFirm.com



THE LAW OFFICE OF  
CASEY D. GISH



1 Alla Zorikova  
2 1905 Wilcox Av., #175  
3 Los Angeles, CA 90068  
4 3232095186  
5 Olivia.car@mail.ru

**EIGHT JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

7 ALLA ZORIKOVA,  
8 Plaintiff,

Case No.: A-20-821249C

9 vs.

10 JULIE PYLE, TAMMY WILLET, VEGAS  
11 SHEPHERD RESCUE AND DOES I  
12 THROUGH X, INDIVIDUALS, AND ROE  
13 BUSINESS ENTITIES I THROUGH X,

MOTION TO SCHEDULE HEARING ON  
PLAINTIFF'S EX PARTE APPLICATION  
FOR TEMPORARY RESTRAINING ORDER  
FROM CUSTODY OF PLAINTIFF'S DOGS  
AND FOR ORDER TO RETURN  
PLAINTIFF'S DOGS AND PLAINTIFF'S  
DECLARATION IN SUPPORT

14 Defendants

15 COMES NOW Plaintiff and respectfully asks this Court to schedule a Hearing for  
16 the closest available date as this is an emergency for her ExParte Application filed on October 24  
17 of 2020.

18 Dated: October 29 of 2020

19  
20  
21 Respectfully submitted, ALLA ZORIKOVA



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27 MOTION TO SCHEDULE HEARING ON PLAINTIFF'S EX PARTE APPLICATION FOR TEMPORARY  
28 RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S DOGS AND FOR ORDER TO RETURN  
PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN SUPPORT - 1



1 Alla Zorikova  
2 1905 Wilcox Av., #175  
3 Los Angeles, CA 90068  
4 3232095186  
5 Olivia.car@mail.ru

**EIGHT JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

7 ALLA ZORIKOVA,  
8 Plaintiff,

Case No.: A-20-821249C

9 vs.

PLAINTIFF'S OBJECTIONS TO  
DEFENDANT'S DEMAND OF SECURITY  
COSTS AND DECLARATION IN SUPPORT

10 JULIE PYLE, TAMMY WILLET, VEGAS  
11 SHEPHERD RESCUE AND DOES I  
12 THROUGH X, INDIVIDUALS, AND ROE  
13 BUSINESS ENTITIES I THROUGH X,

14 Defendants

15  
16 1. Defendants and each of them filed on 10/26/2020 with this Court  
17 Demand for Security of Costs.

18 2. The action for this complaint arises from malicious acts of  
19 Defendants by trespassing Plaintiff's Private property, stealing Plaintiff's  
20 dozens of Top World Class German Shepherd dogs, killing pregnant  
21 females and newborn puppies and totally destroying Plaintiff's business.  
22 Cash and most assets were stolen from the Plaintiff's Property.

23 3. While criminal investigation of this matter continues by San  
24 Bernardino Sheriff Department on this act of theft Plaintiff's Dogs,  
25 Plaintiff is in extremely difficult financial situation, when she has to pay  
26


27  
28 PLAINTIFF'S OBJECTIONS TO DEFENDANT'S DEMAND OF SECURITY COSTS AND DECLARATION IN  
SUPPORT - 1

1 back to her customers back from July of 2020 deposits that they placed on  
2 the dogs that were stolen and also has to withstand daily attacks of  
3 Defendants.

4 4. Plaintiff has been granted TO PROCEED IN FORMA PAUPERIS  
5 on 09/25/2020 including to be court costs waived.  
6

7 Therefore, Plaintiff respectfully asks this Court to Deny Defendants, and each of them, Demands  
8 for Security Costs.  
9

10 Dated: October 29 of 2020  
11

12 Respectfully submitted, ALLA ZORIKOVA   
13  
14

15 DECLARATION OF PLAINTIFF IN SUPPORT  
16

17 I, Alla Zorikova, declare under penalty of perjury to the best of my knowledge the  
18 following:


- 19 1. I was granted to Proceed in Forma Pauperis for this case.  
20 2. My business has been destroyed by Defendants.  
21 3. My assets have been stolen by Defendants.  
22 4. I do not have money neither to pay Demanded by Defendants Security  
23 Costs nor any surety bond fees for the same.  
24 5. Defendants continue their daily attacks on me, my daughter and on our  
25 business.  
26  
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28 PLAINTIFF'S OBJECTIONS TO DEFENDANT'S DEMAND OF SECURITY COSTS AND DECLARATION IN  
SUPPORT - 2

- 1                   6. They are posting online and other media sources false offensive  
2                   information on me and my business, come close to our private Property,  
3                   writing offensive signs and threatening my daughter.  
4  
5                   7. Defendants are Demanding to give them all dogs that we have left and that  
6                   they will kill the dogs and puppies, stating that they do not want single  
7                   puppy be born ever in United States.  
8  
9                   8. Defendants stating that they will put on fire our property if we not stop our  
10                  business.  
11                  9. As a result of these malicious actions, I cannot generate profit from the  
12                  totally destroyed business, and while I can not sleep, can not answer phone  
13                  without thinking that I will hear threats again, without constant threat of  
14                  my loved dogs that left to get killed or destroyed by Defendants.  
15

16  
17                  I certify that all the above is true to the best of my knowledge.  
18

19                  Dated: October 29 of 2020  
20

21  
22                  Respectfully submitted, ALLA ZORIKOVA   
23  
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1 Alla Zorikova  
2 1905 Wilcox Av., #175  
3 Los Angeles, CA 90068  
4 3232095186  
5 Olivia.car@mail.ru

**EIGHT JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

7 ALLA ZORIKOVA,  
8  
9 Plaintiff,

Case No.: A-20-821249C

10 vs.

PLAINTIFF'S PROOF OF SERVICE OF  
OBJECTIONS TO DEFENDANT'S  
DEMAND OF SECURITY COSTS AND  
DECLARATION IN SUPPORT

11 JULIE PYLE, TAMMY WILLET, VEGAS  
12 SHEPHERD RESCUE AND DOES I  
13 THROUGH X, INDIVIDUALS, AND ROE  
14 BUSINESS ENTITIES I THROUGH X,

Defendants

15  
16 I CERTIFY THAT I HAD EMAILED ON OCTOBER 31 OF 2020 TO C GISH PLAINTIFF'S  
17 PROOF OF SERVICE OF OBJECTIONS TO DEFENDANT'S DEMAND OF SECURITY  
18 COSTS AND DECLARATION IN SUPPORT

19 Dated: October 29 of 2020

20  
21  
22 Respectfully submitted, ALLA ZORIKOVA



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28 PLAINTIFF'S PROOF OF SERVICE OF OBJECTIONS TO DEFENDANT'S DEMAND OF SECURITY COSTS  
AND DECLARATION IN SUPPORT - 1

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**DISTRICT COURT  
CLARK COUNTY, NEVADA**  
\*\*\*\*

Electronically Filed  
11/2/2020 1:14 PM  
Steven D. Grierson  
CLERK OF THE COURT



Alla Zorikova, Plaintiff(s)  
vs.  
Julie Pyle, Defendant(s)

Case No.: A-20-821249-C  
Department 20

**NOTICE OF HEARING**

Please be advised that the Plaintiff's Motion to Schedule Hearing on Plaintiff's Ex Parte Application for Temporary Restraining Order from Custody of Plaintiff's Dogs and for Order to Return Plaintiff's Dogs and Plaintiff's Declaration in Support in the above-entitled matter is set for hearing as follows:

**Date:** December 09, 2020  
**Time:** 8:30 AM  
**Location:** RJC Courtroom 12A  
Regional Justice Center  
200 Lewis Ave.  
Las Vegas, NV 89101

**NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.**

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Marie Kramer  
Deputy Clerk of the Court

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

By: /s/ Marie Kramer  
Deputy Clerk of the Court

1 ORDR

2 EIGHTH JUDICIAL DISTRICT COURT

3 CLARK COUNTY, NEVADA

4 ALLA ZORIKOVA,

Case No. A-20-821249-C

5 Plaintiff,

Dept. No. XX

6 vs.

7 JULIE PYLE, TAMMY WILLET, VEGAS  
8 SHEPHERD RESCUE AND DOES I  
9 THROUGH X, INDIVIDUALS, AND ROE  
10 BUSINESS ENTITIES I THROUGH X,

Defendants.

11 **ORDER**

12 **COURT FINDS** after review that on October 24, 2020, Plaintiff Zorikova filed an Ex Parte  
13 Application for Temporary Restraining Order, after filing a Complaint on September 15, 2020:

14 **COURT FURTHER FINDS** after review that on September 25, 2020 an Order to Proceed  
15 in Forma Pauperis was entered granting Plaintiff's Application to Proceed in Forma Pauperis.  
16

17 **COURT FURTHER FINDS** after review that on October 26, 2020, Defendant Julie Pyle  
18 filed a Demand for Security Costs.

19 **COURT FURTHER FINDS** after review that on October 26, 2020, Defendant Tammy  
20 Willet filed a Demand for Security Costs.

21 **COURT FURTHER FINDS** after review that on October 26, 2020, Defendant Vegas  
22 Shepherd Rescue filed a Demand for Security Costs.  
23  
24

1           **COURT FURTHER FINDS** after review that on October 29, 2020, Plaintiff filed a Motion  
2 to Schedule Hearing on Plaintiff's Ex-Parte Application for Temporary Restraining Order from  
3 Custody of Plaintiff's Dogs and for Order to Return Plaintiff's Dogs and Plaintiff's Declaration in  
4 Support. Subsequently, a hearing was set on December 9, 2020 at 8:30 AM

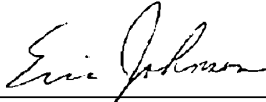
5           **COURT FURTHER FINDS** after review that on October 31, 2020, Plaintiff filed an  
6 Objection to Defendant's Demand for Security Costs on the basis that the Order granting Plaintiff to  
7 proceed in forma pauperis thereby waived court costs. However, security costs as prescribed by NRS  
8 18.130 are statutory and are not waived.

9           **THEREFORE, COURT ORDERS**, after a review that the case cannot move forward until  
10 each security for costs is posted. When security for costs is posted, a hearing can be set on  
11 Plaintiff's Ex-Parte Application for Temporary Restraining Order from Custody of Plaintiff's Dogs  
12 and for Order to Return Plaintiff's Dogs and Plaintiff's Declaration in Support. Service will be  
13 required on all parties. All hearings are done remotely through the Bluejeans application. When a  
14 hearing is set, a link will be sent to all parties.

15           **IT IS HEREBY FURTHER ORDERED** the hearing on December 9, 2020 is VACATED.  
16

17  
18 DATED this \_\_\_\_\_ day of December, 2020.

Dated this 4th day of December, 2020

19  
20   
21 \_\_\_\_\_  
22 ERIC JOHNSON  
23 DISTRICT COURT JUDGE  
24 10B B32 44B3 40B1  
Eric Johnson  
District Court Judge

1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Alla Zorikova, Plaintiff(s)

CASE NO: A-20-821249-C

7 vs.

DEPT. NO. Department 20

8 Julie Pyle, Defendant(s)

9  
10 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 12/4/2020

15 Casey Gish, Esq.

casey@gishlawfirm.com

16  
17 If indicated below, a copy of the above mentioned filings were also served by mail  
18 via United States Postal Service, postage prepaid, to the parties listed below at their last  
19 known addresses on 12/7/2020

20 Alla Zorikova

1905 wilcox ave, #175  
los angeles, CA, 90068

21 Casey Gish

20 Van Law Firm  
21 Attn: Casey D. Gish  
22 5940 S. Rainbow Blvd.  
23 Las Vegas, NV, 89118  
24  
25  
26  
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1 NOH

2 EIGHTH JUDICIAL DISTRICT COURT

3 CLARK COUNTY, NEVADA

4 ALLA ZORIKOVA,

Case No. A- 20-821249-C

5 Plaintiff,

Dept. No. XX

6 vs.

**NOTICE OF HEARING**

7 JULIE PYLE, et al.,

8 Defendant.

9  
10 **NOTICE OF HEARING**

11 Please be advised that a hearing on Plaintiff's Ex Parte Application for  
12 Temporary Restraining Order from Custody of Plaintiff's Dogs and for Order to  
13 Return Plaintiff's Dogs and Plaintiff's Declaration in Support has been scheduled  
14 for **June 9, 2021 at 8:30 a.m.**

15 DATED April 29, 2021.

16 /s/Kelly Muranaka

KELLY MURANAKA

17 Judicial Executive Assistant to:

18 ERIC JOHNSON

District Court Judge



1 Alla Zorikova  
2 1905 Wilcox Av., #175  
3 Los Angeles, CA 90068  
4 3232095186  
5 Olivia.car@mail.ru

**EIGHT JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

7 ALLA ZORIKOVA,  
8 Plaintiff,

Case No.: A-20-821249-C

9 vs.

DECLARATION OF OLIVIA JEONG  
IN SUPPORT  
OF PLAINTIFF'S EXPARTE APPLICATION  
HEARING ON 06/09/2021

11 JULIE PYLE, TAMMY WILLET, CASEY  
12 GISH, VEGAS SHEPHERD RESCUE AND  
13 DOES I THROUGH X, INDIVIDUALS, AND  
14 ROE BUSINESS ENTITIES I THROUGH X,

Defendants

**DECLARATION OF OLIVIA JEONG**

15 I, OLIVIA JEONG, declare:

- 17 1. I am the witness in this action. I make the following declaration based  
18 upon my personal knowledge and could, and would, testify competently  
19 and accurately regarding its contents.
- 21 2. I am the caretaker of the Dogs that Plaintiff Zorikova in this action is  
22 demanding to be returned to her.
- 23 3. I was present when animal control officer Shea, while visiting our kennel  
24 in September of 2020, submitted to Plaintiff Zorikova pictures (Exhibits 2-  
25 9) and stated that she saved those pictures as evidences of stolen from  
26 Plaintiff's property dogs by the Defendants.

28 DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EXPARTE APPLICATION HEARING  
ON 06/09/2021 - 1

4. I recognized those Dogs on the pictures (Exhibit 2-9) as the Dogs that I was raising from the moment they were born and was training them and taking good care.
5. I personally was hiking 3 miles per day with those dogs, in addition to exercising them daily and training.
6. I personally was given potable water for them EACH hour.
7. I fed the Dogs with exceptional fine organic beef, lamb and pork twice per day.
8. The Dogs were in excellent shape and health and were titled on Different German Shepherd Dogs shows, while measured, weighted and evaluated by World Class Judges from all required perspective according to World Standards.
9. I see that Defendants refer on pictures 2-9 to these Dogs as “beauties”, which they truly are.
10. If anyone would see our Dogs in public, most people would approach and express excitement following by words: ”wow”, what a beautiful dogs”.
11. All Dogs were in perfect health always, free from any and all parasites.
12. As to my knowledge, Defendants have about 25 of our stolen dogs
13. San Bernardino’s 10 acres our lawful private property was used as a training site only and never planned for kennel’s permanent location.
14. Our multiple kennel’s site is located in the State of Texas on 200 acres of our private property.
15. We have State of the Art finest facility for our Dogs (Exhibits 10 – 14).

DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF’S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 2



- 1 16. Each Dog enjoys daily walks and training and has 24' X 30' runs in  
2 addition to runs on whole 200 acres.  
3  
4 17. Each our dog is treated as family member, with personal love and care.  
5  
6 18. My heart is broken, I miss my loved Dogs (especially those in Exhibits 2-  
7 9) terribly and know they remember and miss us terribly too.  
8  
9 19. I cried daily months and months after our Dogs were stolen and do not  
10 know when it will feel better if Dogs are not returned.  
11  
12 20. I saw Defendant's Gish 2' by 3' cages that he calls "rooms" in his doggy  
13 daycare, about 500 of those cages on a tiny inside place. Gish thinks it's  
14 ok for Dogs, while I think it's animal cruelty.  
15  
16 21. However, I know that Animal Control's officers are the ONLY one who  
17 authorized to decide what is "ok" and evaluates dog's conditions.  
18  
19 22. We had 3 times Animal Control's personnel visited our kennels in San  
20 Bernardino and all 3 times, 3 different officers found NO violations, that  
21 the Dogs were in good health, not distressed, had shelter and water  
22 (Exhibit 1).  
23  
24 23. It's obvious to me (and I made a LOT of research) that there is a dirty  
25 agenda and dirty money flow behind those "rescued = stolen" dogs  
26 scheme. My latest investigation efforts led to findings that general  
27 socialist agenda is to eliminate ALL pet stores (which is completed)  
28 followed by eliminating ALL breeders (half way though), followed by  
eliminating farmers etc while suppressing HUMANS, hurting HUMANS,  
offending HUMANS, restricting HUMANS, destroying HUMAN's

DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 3

1 businesses and job places AND substituting “American MADE dogs” by  
2 IMPORTED (mainly from China) “rescued” dogs and other pets.

3 Furthermore, those “substituters” are making BILLIONS of dirty money  
4 on this scheme only on importing those “rescued” dogs, than lobbying  
5 with ridiculous animal laws that padding the dirty flow.  
6

7 24. And boy, what a value for thieves are those \$50k each on average young,  
8 trained, purebred, sired by champions, titled german shepherds including  
9 puppies and pregnant females!!  
10

11 25. I had started movement <http://humanrightsvsanimalrights.org>

12 26. I declare under penalty of perjury under the laws of the State of Nevada  
13 that the foregoing is true and correct.  
14

15 

16 · Olivia Jeong

17 ATTACHMENT 1 p1  
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28 DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF’S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 4

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**A20-172252-1 ASSIST/POLICE** Priority Level: 3 Total Animals: 20 Animal Type: DOG

Activity Address: LOCKHART RD RED MOUNTAIN  
 Activity Comment: O-67 87 W/ DEP ALEXANDER. WILL DIRECT TO ADDRESS FOR ASSIST. LOG# BA022

**Caller Information:**

**Result Codes:**  
1 RSVLD

Officer: P999067 CHAVEZ Clerk: B4869

Call Date: 08/08/20 02:02 PM  
 New Date: 08/08/20 02:02 PM  
 Dispatch Date: 08/08/20 02:30 PM  
 Working Date: 08/08/20 04:13 PM  
 Complete Date: 08/08/20 04:21 PM

**Memo:**

08/17/20 Myself and O-94 MC with the owner and her daughter. The owner drove us to a Government owned spring where they get their water. She then walked us around the property and showed us all the dogs who all had water and shelter. She stated she picks up left over meat from Barstow Country Butcher daily for the dogs food. The address to the property is 1370 Trump Rd, but it does not come up on the map yet. I took pictures and put them in O-67 folder. H9045/0-85

8/8/20 O-67 arrived to the call and said all dogs had water and shade. O-67 said all dogs were healthy and normal. He said there were 50+ dogs on the ppty and they all had water and shade in their cages. O-67 said the dog owner was going to be arrested for 597 due to the Deputy's not viewing water and shade. I told O-67 we weren't going to impound the dogs today. I told him to make sure the dogs have water and we will return on 8/9 to ensure the dogs still have water and aren't in distress, we hung up the phone. O-67 called me back asking about under age pups on the ppty. I asked to talk to an Officer on the ppty, the phone was handed to a SGT. I was unable to get his name due to the fact he was so upset we weren't impounding dogs. I listened to him about how he is leaving and didn't care what animal control does or doesn't do. I told O-67 to post the ppty and impound all under age pups that didn't have a mother. I called O-67 back to make sure SO knew ACC wouldn't pay for the cost of the dogs or any of the fees that incur. He put me on the phone with officer Parsons. I explained to her Sheriff Dpt will have to pay for all the cost of the dogs. She went on a rant about how she doesn't care she is only there to uphold her officer oath. I was able to explain to her we were not picking up 50+ dogs today and we would return each day to water and feed to ensure none of them go into distress, until we make arrangements to impound all 50+ dogs. B4869

8/8/20 I M/C with S/O and was able to see many dogs in plain view on property. The dogs were all large G. Sheps were in pens with shade cloth. All the G. sheps had shade and shelter all had little water. None of the dogs appear to be in distress and all appear to be healthy and normal, S/O and dog owner gave the dogs water. There were 12 pups unknown which of the female dogs was the mother. Per O-99/ O-90 the pups were to be impounded and the property is to be posted for 24 hr abandonment. I posted the front gate, side gate, and the little house/shack @ 16:20 for 48 G- Sheps per S/O they arrested dog owner for 597 animals in distress. ...pic in O-67 folder.....c3865

Attachment 1 P2

DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 5

8/8/20 directions to the property.: hwy15 north to hwy 58 west, go north on Haper lake Rd for about 6.8 mi. you will then turn left on Hoffman Rd till paved rd. at end of paved rd go right for about 4.1 mi at the pole with blue ribbon go left for 0.1 mil first dirt rd go right for 0.8 mil then left at the red pole the prop will be to your right....c3865

08/09/20 I met with Dep Parson's and we fed and watered the dogs. All of O-67 notices were still up and the dogs were still on the property. I counted at least 63 dogs but they were hiding in the dens so it was hard to get a full count. I posted 7 ON next to O-67 advising abandonment for the 50+ dogs and 1 chicken. When I was leaving Dep Parsons had someone pulled over at Hoffman rd X Hoffman Rd and as I drove down Hoffman Rd to Harper Valley Lake rd and there was a lifted black Dodge Ram 2500 or 3500 with a man and a woman in it followed by a larger white van with German shep stickers on it. I tried to talk to them but they would not speak with me and drove East on Hoffman Rd. I did not get the lic plate numbers for the truck but I did get a partial plate on the van. The first 3 letters were "AKC". I was unable to take pictures as my camera was overheating and not working properly H9045/0-85

08/11/20 I took pictures and noticed a significant amount of dogs were missing and the chicken was gone. O-55/Stevens counted 25 dogs on the property. We impounded 1 dog that was stuck under fencing trying to get shade under a board. While pulling in Lt. Molina noticed goats on the North/East corner/side of the property line. I went to go check and there was a male Nigerian dwarf goat tied with a collar and chain to the ground as well as a Nubian/Alpine mix female goat who was also tied down by a collar and chain. Neither goat had food water or shelter. We put both goats in the truck and gave them water. 25 dogs and 2 goats where impounded in total. Lt Molina was then leaving the property and a white van with German shep stickers and advertising of rescues pulled up. Lt Molina asked why they were there and the woman stated this was the first time she was out here and Lt. Molina took down her lic plate which was "AKC GSD" and there was a phone number on the side of the van "909-297-6217". The woman would not give any more information and drove away. All pictures are in O-67 folder. h9045/0-85

DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 6

1 ATTACHMENT 3

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28 DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 7

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PARTE APPLICATIONHEARING

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28 DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION HEARING  
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**Vegas Shepherd Rescue**

Beacon · Aug 12 ·

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PARTE APPLICATIONHEARING



1 ATTACHMENT 5

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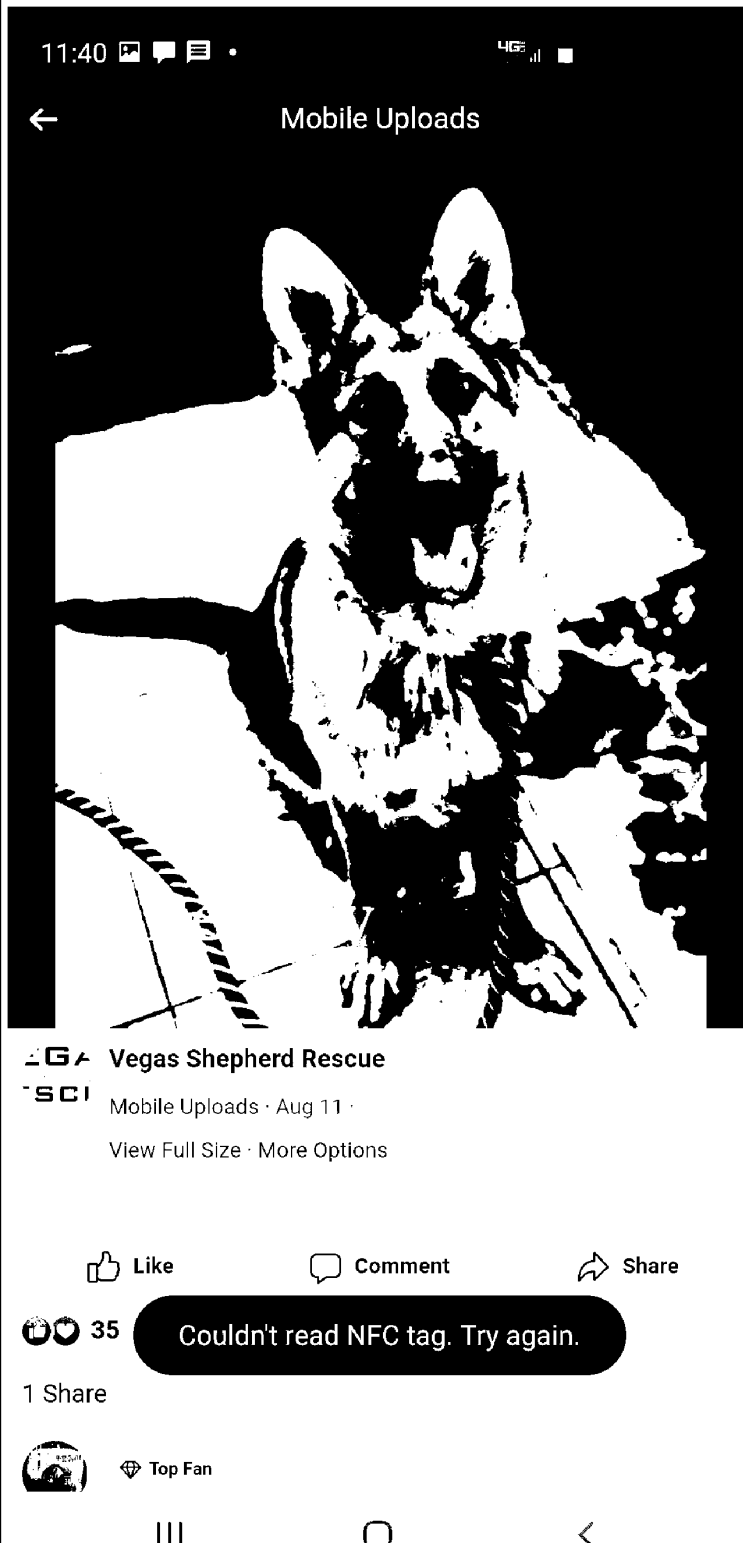
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28 DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 11

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PARTE APPLICATIONHEARING

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28 DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 13


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
   





 **Vegas Shepherd Rescue**




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1 ATTACHMENT 7

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28 DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 15

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 **Vegas Shepherd Rescue**




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28 DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 17

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 Vegas Shepherd Rescue

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PARTE APPLICATIONHEARING



1 ATTACHMENT 8

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28 DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 19

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PARTE APPLICATIONHEARING

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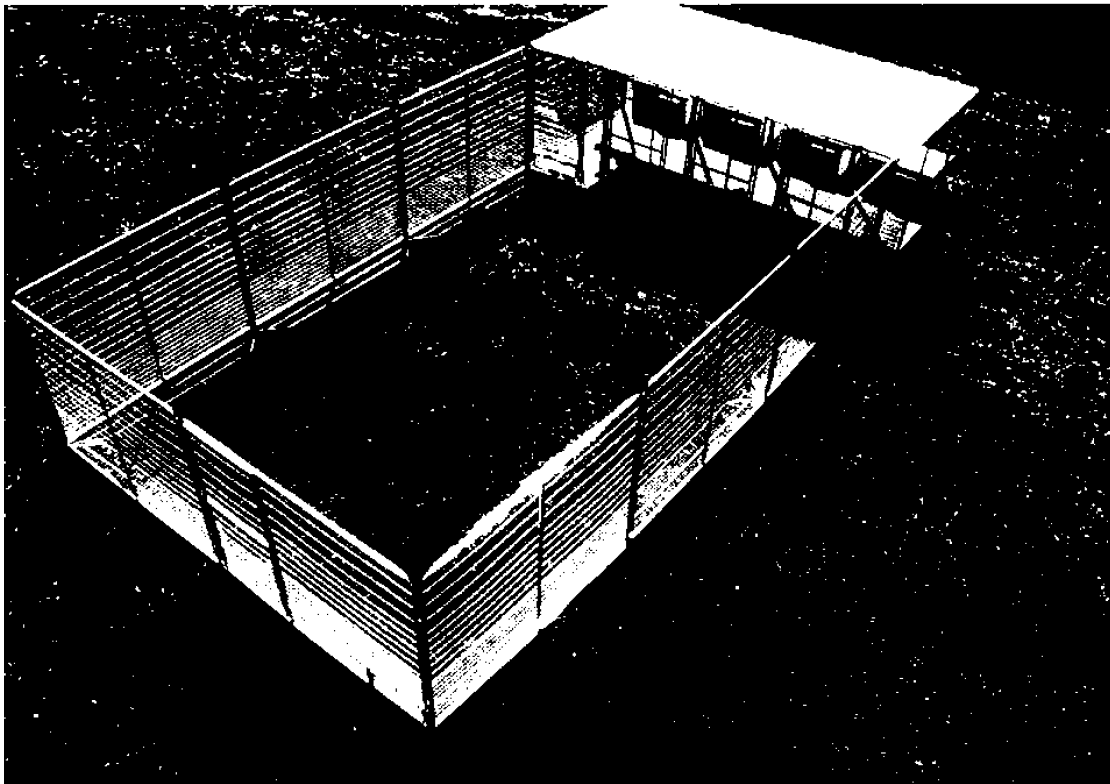
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28 DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 21

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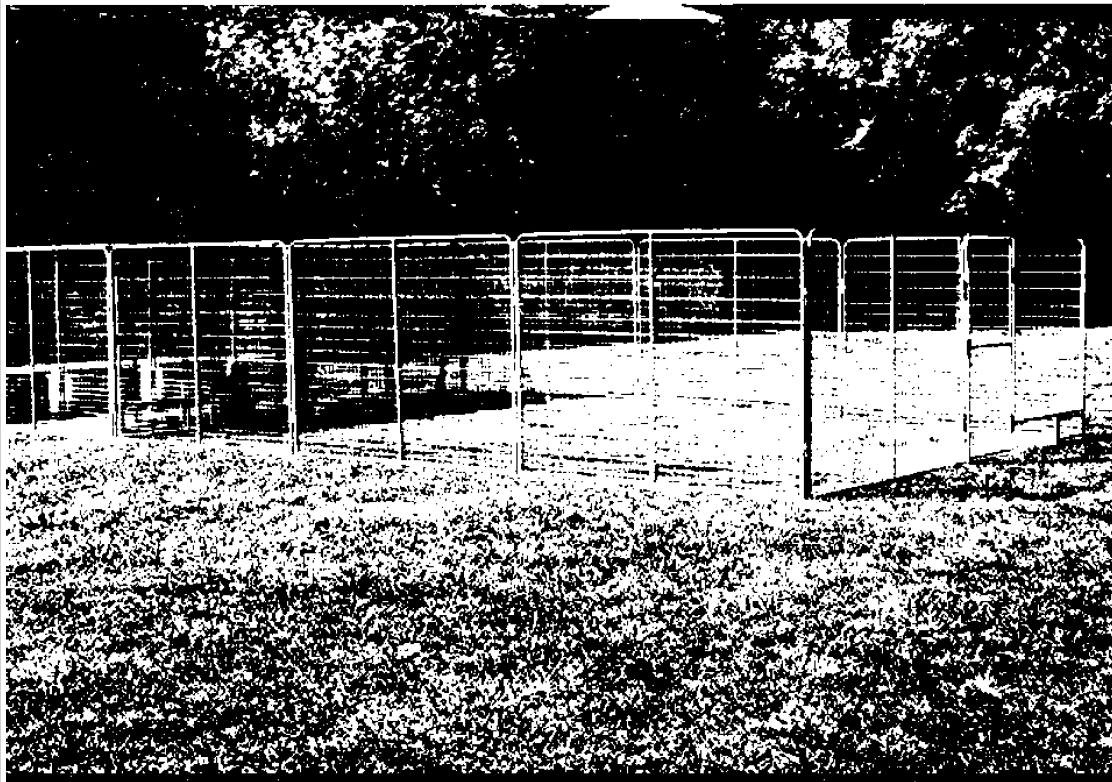
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## EXHIBIT 10

DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 23

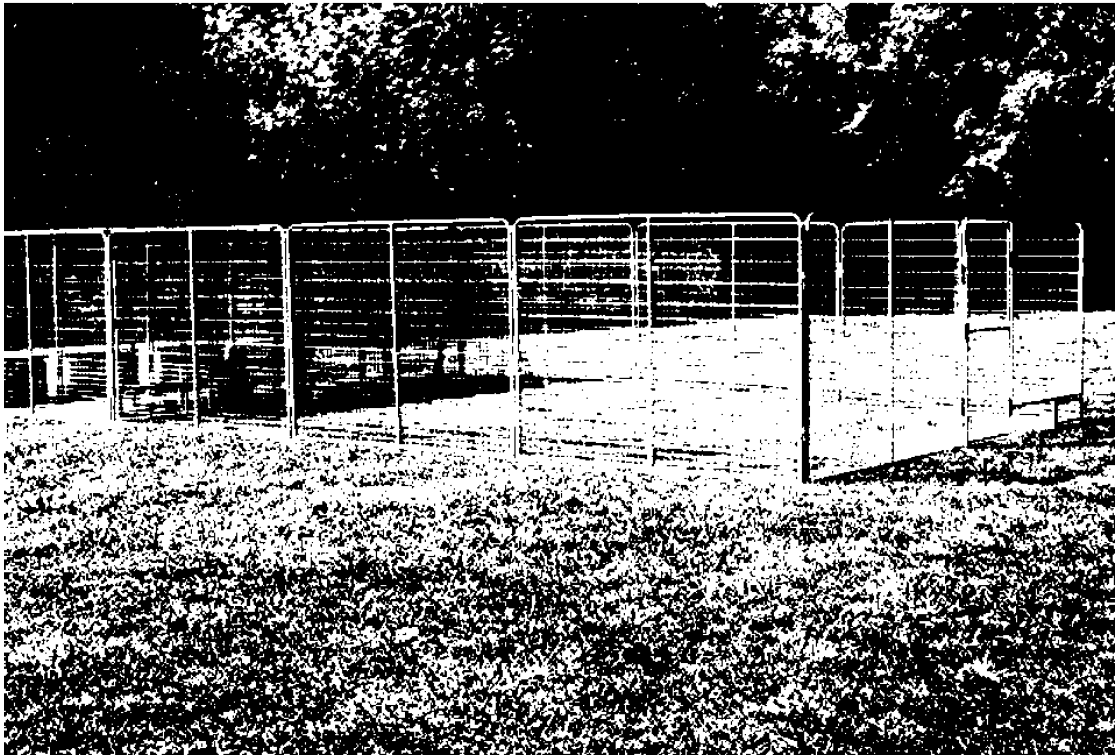
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## EXHIBIT 11

DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 24

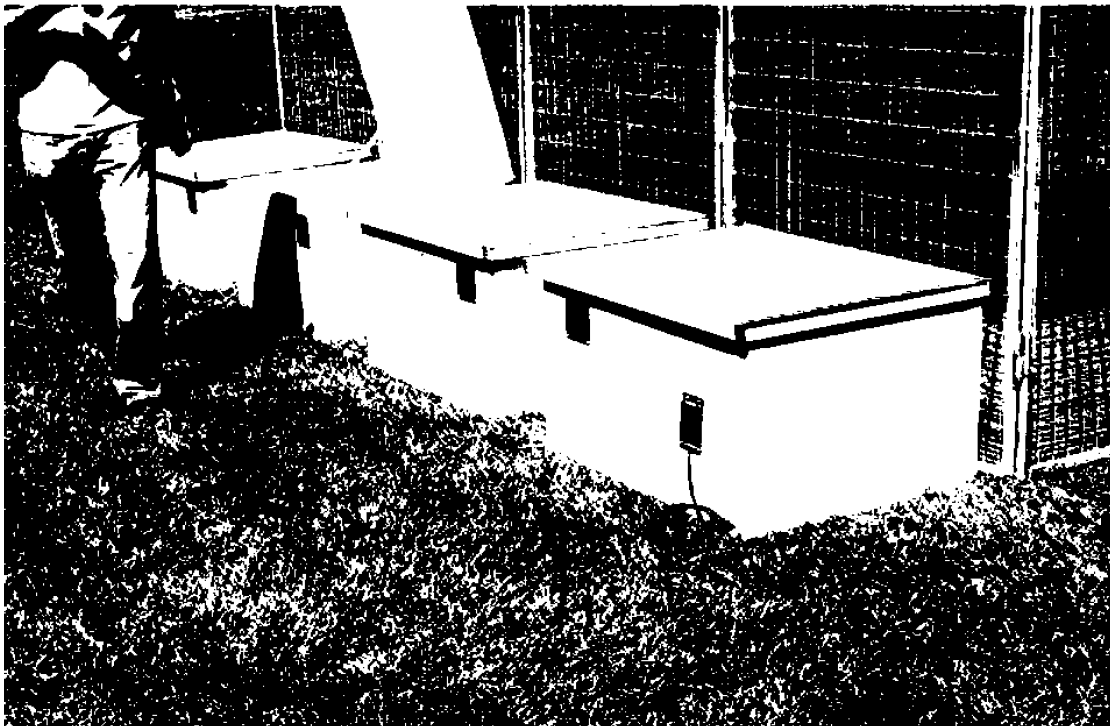
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## EXHIBIT 12

DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 25

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## EXHIBIT 14

DECLARATION OF OLIVIA JEONG IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION HEARING  
ON 06/09/2021 - 26





1 Alla Zorikova  
2 1905 Wilcox Av., #175  
3 Los Angeles, CA 90068  
4 3232095186  
5 Olivia.car@mail.ru

**EIGHT JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

7 ALLA ZORIKOVA,  
8 Plaintiff,

Case No.: A-20-821249-C

9 vs.

**CERTIFICATE OF SERVICE**

10  
11 JULIE PYLE, TAMMY WILLET, CASEY  
12 GISH, VEGAS SHEPHERD RESCUE AND  
13 DOES I THROUGH X, INDIVIDUALS, AND  
14 ROE BUSINESS ENTITIES I THROUGH X,  
15 Defendants

**CERTIFICATE OF SERVICE**

16  
17  
18 I, Alla Zorikova, certify that I had emailed Certificate of Service, Declaration of  
19 Olivia Jeong and Exhibits 10 -14 to Casey Gish on 05/06/2021.

20  
21 05/06/2021



23 Respectfully, Alla Zorikova

24  
25  
26  
27  
28  
CERTIFICATE OF SERVICE - 1



Alia Zaslavna  
1905 Wilton Ave., #17C  
Los Angeles, CA 90068  
3232095106  
Olivia.car@gmail.ru

EIGHT JUDICIAL DISTRICT COURT  
CLARK COUNTY, NEVADA

ALLA ZORIKOVA,	E.A. N. 131384
JULIE PYLLE TAYLOR WILLET, CASEY GEM VEGAS MEMPHIS RESCUE AND DOES1 THROUGH 9, INDENTICALS, AND ROE BUSINESS ENTITIES THROUGH 9,	PLAINTIFFS MOTION FOR LEAVE OF COURT TO AMEND COMPLAINT BY ADDING DEFENDANTS
	Deposition 28
	HEARING REQUESTED

COMES NOW, the PLAINTIFF ALLA ZORIKOVA appearing pro se and submits

following notation.

**Plaintiff Ali Zorbova respectfully asks the Court to add to this case the following Defendants:**

1. SNAREL (Southern Nevada Animal Rescue League), business entity.

Clark County, Las Vegas, NV

- <sup>2</sup> CHELSEA WARD MOORE, individual, president of ENARL.

Clark County, Las Vegas, NV

3. Vegas Pet Rescue Project. [bit.ly/vegaspetrescue](http://bit.ly/vegaspetrescue).

2817 Seashell Ct

Los Yemas, NY 1212

4. CASEY GISH, individual, board member of Vegas Pet Rescue (Exhibit 1)

Project

4940 S. Polakow-Baer

Los Angeles, CA 90012

## STATEMENT OF FACTS

- <sup>5</sup> There is ongoing clinical investigation on the allegedly stolen 24 primary sheepdog dogs conducted by detectives of San Bernardino Sheriff Department (the true and correct copy of attached therein "Declaration of Detective's Crime" as Exhibit 5.).

6. No criminal charges has ever been filed by District Attorney against Plaintiff. Further, Plaintiff does not have any criminal records.

7. On August 09, 10, 17 of 2020 and in October of 2020 Animal Control Personnel visited Plaintiff's Dog training private property and had found in all 4 visits of Plaintiff's Dogs in good health, not distressed, all having shelter and water, the one and correct copy of A.C. Report attached thereto as Exhibit 6) and therefore, never had legal reason to take Plaintiff's Dogs.

- 8 Animal Control's personnel Tara Campos, Desiree Molina and Clarity Hamrick stated to Plaintiff the half dogs were missing when they were arrived on August 16th of 2020 to the San Bernardino's Plaintiff's private property and AC officers had provided Plaintiff with all evidences they had and found regarding who stole the missing dogs and puppies on August 9<sup>th</sup> of 2020.

9. San Bernardino County Sheriff's Detachments conducted searches and seized property in suspect's Lashie Gregory and others homes in California and Nevada in September of 2019 (Exhibit S).

15. Investigation is still ongoing; however, some admissions to Derivatives have been made by Defendants during the investigation (the name and correct copy of case attached thereto as:

- CASE NO. 5:20-cv-01876-JGD-SPx Eddah 2.D

12. SNARE admitted receiving 20 of my dogs (the true and correct copy of case attached hereto as CASE NO. 5-20-cv-01576-JGB-SPc, Exhibit 4).

12. The following has been admitted as fact in the Second Amended Complaint filed by Defendants (in this case) against San Bernardino County and detectives and State's response Declaration of Detective Grimes: (Exhibit 7, 8)

- a). Sheriff's Department did NOT authorize anyone, nor any resources to take the Plaintiff's Dogs (the true and correct copy of case attached thereto as CASE NO. 820 cr-01556-JGB-SUP (Exhibit 1))

- b). SNAEL took without authorization Plaintiff's dogs (about 20 of those) from San Bernardino County in August of 2020.

- c). Defendants stated that the dogs are not in their possession any longer.

4. Defendants were inquired by Detectives as where they placed the stolen dogs and Defendants refused to state to Detectives where the dogs have been placed as well as they refused to show any documentation related to placement.

Case: Galt (case # A-10-329761C); however, that case was on stay upon Defendant's

received and was discussed without variation and without Plaintiff's knowledge.

## MEMORANDUM OF LAW

Newly Rules of Civil Procedure

RULE 15 AMENDED AND SUPPLEMENTAL PLEADINGS

- (c) *Annulment*.—A party may *annul* the party's pleading once at a matter of course at any time before a pre-answer pleading is served or, if the pleading is one to which no responsive pleading is permitted and the action has not been placed upon the trial calendar, the party may so *annul* it at any time within 20 days after it is served. Otherwise a party who *annuls* the party's pleading only be leave of court or by written consent of the adverse party, and leave shall be freely given when justice so requires. A party shall plead in response to an *annulment* of pleading—only the facts remaining for response to the original pleading or within 10 days after service on the party of the *annulment*, whichever period may be the longer, unless the court otherwise orders.

## CONCLUSION

Based on the fact that J. Gregory, Chelsea Ward and C. Gish are individuals and, as individuals and board members of Vegas Pet Rescue Project, SNARL admitted once possession of Plaintiff's dogs and for judicial efficiency, I, Alla Zarokova, respectfully ask this Court to add listed above Defendants to this matter based on the same causes of actions and relation to the facts and Defendants in this current case.

Manuscript received 4-1-84 (1984-1-1)

CERTIFICATE OF SERVICE

I, Alla Zorkova, certify that on May 28 of 2021 I had emailed the copy of the same to Carter Geth Jamie Gonzalez.

Print: Mar 26 of 2022

Respectfully submitted, A.L.A ZORIKOVA



opencorporates.com/comp

**Native Company Number**

E0599562017-1

**Status**

Active

**Incorporation Date**

27 December 2017 (over 3 years ago)

**Company Type**

Domestic Nonprofit Corporation

**Jurisdiction**

Nevada (US)

**Agent Name**

THE LAW OFFICE OF CASEY D. GISH, INC

**Agent Address**

5940 SOUTH RAINBOW BLVD., LAS VEGAS, NV, 89148

**Directors / Officers**

ALLIE BARTHOLOMEW, secretary

CASEY GISH, director

JAMIE GREGORY, director

JAMIE M GREGORY, president

JENNIFER SMITH, treasurer

SAMANTHA BRACCHI, treasurer

THE LAW OFFICE OF CASEY D. GISH, INC, agent

TINA HAYES, secretary

**Registry Page**<https://esos.nv.gov/EntitySearch/Onli...>**Recent filings for VEGAS PET RESCUE PROJECT**

17 Dec CHARITABLE SOLICITATION REGISTRATION  
2020 STATEMENT

17 Dec ANNUAL LIST  
2020

31 Dec ANNUAL LIST



[REDACTED]

On Monday, August 31, 2020, Detective Grimm contacted Chelsea Moore, the President of Southern Nevada Animal Rescue League, (SNARL), to ask about any involvement or knowledge of the stolen dogs from 46535 Lockhart, located in the unincorporated area of Hinkley. While Detective Grimm was on the phone with Moore, she asked to include an additional person into the phone conversation. Casey Gish got on the phone and identified himself as the attorney for SNARL. Casey Gish works at the Law Office of Casey Gish and is a civil attorney.

Gish confirmed knowledge of the stolen dogs. Gish said representatives of SNARL went to an unknown bar in the area of Barstow and met with other animal rescue organizations who were requesting assistance in placing the dogs. Gish confirmed, SNARL took about 20 dogs but was not certain on the exact number. The dogs are no longer physically in the care of SNARL. Detective Grimm asked Gish if SNARL had information where the dogs were placed after they took possession. He confirmed SNARL did have that information but he refused to provide any documentation of where the stolen dogs were placed. Gish is compiling a separate investigation and is going to provide his documentation of abuse to the dogs to several government agencies. Detective Grimm requested for Gish to provide him with any information about who contacted him and or facilitated taking possession of the dogs. Gish refused to provide any information in that regard. Gish instructed Moore not to speak with Detective Grimm without him being present. Moore was on the phone during the complete phone interview.

Detective Grimm tried to locate a separate business location for SNARL and during his conversation with Moore and Gish. Gish denied having a rescue center where they house animals. Detective Grimm believes a search of Moore's residence will produce evidence of the theft of the German Shepherds.

70. Thus, this redacted portion of the document, which Detective Grimm states a declaration is redacted "due to the ongoing investigation," contains no information privileged. The redacted portion: 1) admits that "deputies located approximately near Shephard's [sic] without food, water and adequate shelter," 2) the suspects,

re the purported owners of these dogs the County is now siding with in its "theft" action, "were arrested and booked into jail for Felony Cruelty to Animals," and gely, 3) "***Officers were not able to take the remaining 30 plus German rds,***" admitting that the County simply abandoned these dogs on vacant, oved land in the middle of the desert with no food, water, or shelter.

71. The affidavit then falsely claims, "An unknown person notified several rescues about the dogs still being on the property." The person is not unknown to ants. The County knows that the call to rescue came from within the San lino County Sheriff's Department.

72. The affidavit next falsely claims, "The animal rescues responded to the

1 it. CPS then came and interviewed the Ward's children separately after the officers had  
2 finished their three hour search, claiming it was due to the dog defecation in the  
3 bedroom.

4 50. CPS asked the Ward's children how they feel about their parents rescuing  
5 animals. CPS also went around the neighborhood knocking on all the neighbors' doors,  
6 asking if they had seen evidence of child abuse, which the neighbors said was not the  
7 case. The Ward's neighbors came over afterwards to make sure they were okay after  
8 seeing multiple law enforcement vehicles surrounding the Ward's home, followed by  
9 CPS canvassing the neighborhood.

10 51. Defendant Grimm's officers also took photos of everything in the Ward's  
11 home, including dishes in the sink from a dinner the previous night that had not been  
12 cleaned yet. During the search, Defendant Grimm even made us put our 14 year old  
13 senior dog outside for over an hour while officers searched their home. Despite  
14 repeatedly asking him, he would not allow the Wards to bring our dog inside.

15 52. Defendant Grimm said he was investigating the theft of German Shepherds  
16 from the desert in San Bernardino.

17 53. The German Shepherds SNARL received from San Bernardino that had  
18 been rescued from the desert in San Bernardino by other rescues who called SNARL for  
19 help adopting the animals all required extensive medical treatment. An example of one  
20 of the dog's veterinary charts is attached hereto as Exhibit 2.

21 54. SNARL spent thousands of dollars on caring for these dogs, including  
22 spaying and neutering them. When SNALR adopted them out, SNARL only received the  
23 standard adoption fee of \$500-\$700 dollars, which covered about one fourth of the  
24 veterinary costs SNARL incurred.

25 55. The rescue groups SNARL obtained these dogs from rescued them from the  
26 desert at the direction of San Bernardino County Sheriff's deputies after the people  
27 responsible for dumping them there were arrested and booked into jail on animal cruelty  
28 charges.

1 56. Defendants also showed up at the home of Plaintiff Jamie Gregory the next  
2 day, September 11, 2020, with a search warrant also obtained with false statements.  
3 Defendants had 10 officers who were not wearing masks during the pandemic inside  
4 Gregory's home tossing everything upside down, and eventually seizing two laptops and  
5 Gregory's cellphone.

6 57. Gregory offered to let Defendants look through her laptops and phone on  
7 the spot and told Defendants she could not afford to purchase another computer and  
8 phone and to please not take her property. Defendant Grimm took the property anyway.

9 **FIRST CAUSE OF ACTION**

10 **42 U.S.C. § 1983**

11 **(All Plaintiffs against Grimm, Gilmore, and Gregory, and Does 1-10)**

12 58. Plaintiffs re-allege and incorporate by reference all prior paragraphs of this  
13 Complaint as though each were set forth herein in full.

14 59. Title 42 U.S.C. § 1983 states in pertinent part: "Every person who, under  
15 color of [law] subjects, or causes to be subjected, any person of the United States . . . to

Electronically Filed

5/29/2021 4:54 AM

Steven D. Grierson

CLERK OF THE COURT



EXHIBIT 5

Case 5:20-cv-01876-JGB-SP Document 14-1 Filed 09/16/20 Page 1 of 4 Page ID #:121

1 HEIDI K. WILLIAMS (CA State Bar No. 297428)  
Deputy County Counsel  
2 MICHELLE D. BLAKEMORE (CA State Bar No. 110474)  
County Counsel  
3 385 North Arrowhead Avenue, Fourth Floor  
San Bernardino, California 92415-0140  
4 Telephone: (909) 387-5455  
Facsimile: (909) 387-4069  
5 E-Mail: heidi.williams@cc.sbcounty.gov

6 Attorneys for Specially Appearing Defendants Brian Grimm, J. Gregory, Darren  
Gilmore, and County of San Bernardino  
7

8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA  
10

11 CHRISTINA SATO, an individual;  
12 ROXANNE LOPEZ, an individual; and  
13 DILEY GREISER, an individual

14 Plaintiff,

15 v.

16 BRIAN GRIMM, an individual; J.  
GREGORY, an individual; DARREN  
17 GILMORE, an individual; and DOES  
1-10,

18 Defendants.  
19

Case No. 5:20-cv-01876 JGB-SP

DECLARATION OF BRIAN GRIMM IN  
OPPOSITION TO PLAINTIFFS' EX  
PARTE APPLICATION FOR  
TEMPORARY RESTRAINING ORDER

Honorable District Court Judge  
Jesus G. Bernal

Honorable Magistrate Judge  
Sheri Pym

20  
21 I, Brian Grimm, declare:

22 1. I am employed as a sworn peace officer by the County of San Bernardino to  
23 serve as a Detective in the Sheriff's Department. I make this Declaration of my own free  
24 will and if called to testify to the facts stated herein, I could and would competently do  
25 so as they are within my own personal knowledge.

26 2. I have been employed by the County of San Bernardino since July 2008. I  
27 have training, experience, and professional expertise pertaining to the investigation of  
28

DECLARATION OF BRIAN GRIMM IN OPPOSITION TO PLAINTIFFS' EX PARTE  
APPLICATION FOR TEMPORARY RESTRAINING ORDER



Case 5:20-cv-01876-JGB-SP Document 14-1 Filed 09/16/20 Page 2 of 4 Page ID #:122

1 suspected crimes, drafting affidavits and statements of probable cause in support of  
2 warrants to search and seize evidence, collection and preservation of evidence, and  
3 interviewing suspects and witnesses.

4 3. In August and September 2020, I was assigned to work at the Barstow  
5 Sheriff's Station.

6 4. I am currently the case agent for an investigation into the alleged theft of  
7 numerous German Shepherd canines from a property located in the County area of  
8 Barstow in the community of Hinkley, California. This location is within the  
9 jurisdiction of the County of San Bernardino Sheriff's Department.

10 5. On or about September 2, 2020, due to information collected during my  
11 investigation, I authored a search warrant for a residential property located on Riverside  
12 Drive in Apple Valley, California. I submitted the warrant along with a statement of  
13 probable cause and a statement of expertise of affiant to the Superior Court of California,  
14 County of San Bernardino for consideration by a bench officer. Judge Steve Mapes  
15 reviewed the items submitted and issued the warrant electronically on September 2, 2020  
16 at 5:04 p.m. A true and correct copy of the warrant pertaining to Riverside Drive is  
17 attached to this Declaration as Exhibit "A." The house number has been redacted from  
18 this document. The statement of probable cause and statement of expertise of affiant are  
19 not included as they are not provided when a warrant is served.

20 6. On September 3, 2020, I served the warrant on plaintiff CHRISTINA  
21 SATO, a resident of the premises on Riverside Drive to be searched. The premises was  
22 searched pursuant to the warrant. Property was seized from that premises pursuant to the  
23 warrant. I booked property collected into evidence to maintain the chain of custody for  
24 use in potential criminal prosecution.

25 7. On or about September 9, 2020, due to information collected during my  
26 investigation, I authored a search warrant for a residential property located on Pier Drive  
27 in Victorville, California. I submitted the warrant along with a statement of probable  
28

2  
DECLARATION OF BRIAN GRIMM IN OPPOSITION TO PLAINTIFFS' EX PARTE  
APPLICATION FOR TEMPORARY RESTRAINING ORDER

Case 5:20-cv-01876-JGB-SP Document 14-1 Filed 09/16/20 Page 3 of 4 Page ID #:123

1 cause and a statement of expertise of affiant to the Superior Court of California, County  
2 of San Bernardino for consideration by a bench officer. Judge Corey G. Lee reviewed  
3 the items submitted and issued the warrant electronically on September 9, 2020 at 11:59  
4 a.m. A true and correct copy of the warrant pertaining to Pier Drive is attached to this  
5 Declaration as Exhibit "B." The house number has been redacted from this document.  
6 The statement of probable cause and statement of expertise of affiant are not included as  
7 they are not provided when a warrant is served.

8 8. On September 9, 2020, I served the warrant on plaintiff DILEY GREISER,  
9 a resident of the premises on Pier Drive to be searched. The premises was searched  
10 pursuant to the warrant. Property was seized from that premises pursuant to the warrant.  
11 I booked property into evidence to maintain the chain of custody for use in potential  
12 criminal prosecution.

13 9. My investigation led to the discovery that potential evidence was located in  
14 the State of Nevada. I coordinated with law enforcement agencies in that jurisdiction for  
15 assistance in obtaining search warrants in that location.

16 10. On or about September 10, 2020, due to information collected during my  
17 investigation, Detective A. Antoniewicz of the North Las Vegas Police Department  
18 authored an Application and Affidavit for Search Warrant for a residential property  
19 located on Pine Blossom Avenue in North Las Vegas, Nevada. Detective Antoniewicz  
20 submitted the application for a warrant along with a statement of probable cause to the  
21 the North Las Vegas Justice Court, for consideration by a bench officer. Judge Kalani  
22 Hoo of that court reviewed the items submitted and issued the warrant on September 10,  
23 2020. A true and correct copy of the warrant pertaining to Pine Blossom Avenue is  
24 attached to this Declaration as Exhibit "C." The house number and portions of the  
25 probable cause declaration have been redacted from this document due to the ongoing  
26 investigation.

27 11. On September 10, 2020, I was present when Detective Antoniewicz served  
28

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DECLARATION OF BRIAN GRIMM IN OPPOSITION TO PLAINTIFFS' EX PARTE  
APPLICATION FOR TEMPORARY RESTRAINING ORDER

Case 5:20-cv-01876-JGB-SP Document 14-1 Filed 09/16/20 Page 4 of 4 Page ID #:124

1 the warrant on plaintiff CHELSEA WARD, a resident of the premises on Pine Blossom  
2 Avenue to be searched. The premises was searched pursuant to the warrant. No  
3 property was seized from that premises. Photographs were taken pursuant to the warrant  
4 by officers employed by North Las Vegas Police Department. As of September 15,  
5 2020, I was not in possession of those photographs and had not booked them into  
6 evidence.


7 12. As of September 15, 2020, the criminal investigation of the alleged theft of  
8 numerous German Shepherd canines is ongoing.

9  
10 I declare under penalty of perjury under the laws of the State of California and  
11 those of the United States of America that the foregoing is true and correct and that this  
12 Declaration was executed the 15th day of September, 2020 in Barstow, California.

13  
14  E3906  
15 DETECTIVE BRIAN GRIMM,  
16 DECLARANT  
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DECLARATION OF BRIAN GRIMM IN OPPOSITION TO PLAINTIFFS' EX PARTE  
APPLICATION FOR TEMPORARY RESTRAINING ORDER

# EXHIBIT “A”

	<b>SUPERIOR COURT OF CALIFORNIA</b> <b>County of San Bernardino</b>	Warrant No. _____
	<b>SEARCH WARRANT</b> Probable Cause Warrant to Search (Penal Code Section 1524)	Report #: <u>068001074</u>
<b>SEARCH WARRANT AND AFFIDAVIT</b>		
<b>AFFIDAVIT</b>		
I, Detective B. Grimm swear under oath that the facts expressed by me in the attached and incorporated Statement of Probable Cause are true and that based thereon I have probable cause to believe and do believe that the articles, property, and persons described below may be lawfully seized pursuant to Penal Code Section 1524, as indicated below, and is now located at the location(s) set forth below. Wherefore, I request that this Search Warrant be issued.		
_____ (Signature of Affiant)	MOBS SEALING REQUESTED: _____ NIGHT SEARCH REQUESTED: _____	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>SEARCH WARRANT</b>		
THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SAN BERNARDINO: proof by affidavit, under penalty of perjury, having been made before me by Deputy B. Grimm that there is probable cause to believe that the property or person described herein may be found at the location(s) set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524 et seq., as indicated below by " <input checked="" type="checkbox"/> "(s), in that:		
<input type="checkbox"/> It was stolen or embezzled;		
<input checked="" type="checkbox"/> It was used as the means of committing a felony;		
<input checked="" type="checkbox"/> It is possessed by a person with the intent to use it as means of committing a public offense or is possessed by another to whom he or she may have delivered it for the purpose of concealing it or preventing its discovery;		
<input checked="" type="checkbox"/> It tends to show that a felony has been committed or that a particular person has committed a felony;		
<input type="checkbox"/> It tends to show that sexual exploitation of a child, in violation of Penal Code Section 311.3, or possession of matter depicting sexual conduct of a person under the age of 18 years, in violation of Section 311.11, has occurred or is occurring;		
<input type="checkbox"/> an arrest warrant has been issued for _____ N/A _____;		
<input type="checkbox"/> a provider of electronic communication service or remote computing service has records of evidence, as specified in Penal Code Section 1524.3, showing that property was stolen or embezzled constituting a misdemeanor, or that property or things are in possession of any person with intent to use them as a means of committing a misdemeanor public offense, or in the possession of another to whom he or she may have delivered them for the purpose of concealing them or preventing their discovery;		
Search Warrant DR# _____ - 1 - _____		

Warrant ID: 000045029

Page 1 of 8

5

**PREMISES TO BE SEARCHED:**

██████████ Riverside Drive, Apple Valley CA 92307



██████████ Riverside Drive, Apple Valley CA 92306, is a single-family residence located on the west side of Riverside drive with red clay scalloped shingles on the roof and light tan stucco. The residence has a double entrance door and a three-car garage located on the north end of the residence.

**YOU ARE THEREFORE COMMANDED TO SEARCH:**

The search of the above location shall include all rooms, attics, basements, sub-basements, file cabinets, storage devices, electronic storage devices, cellular phones, smart phones, containers or compartments, surrounding grounds, any garages, out-buildings, sheds, cellars, safes, vaults and other parts therein; subterranean burial grounds, outside storage areas, storage units, bushes, easements, alleyways, trees, adjoining utility right-of-ways connected to the property, trash containers, trailers, campers, outbuildings of any kind and any place or thing not listed that could be reasonable to conceal or contain the following property and/or persons located therein, and all persons located on or at the premises. Any device or container of significant size to conceal the below listed property to be seized, that is found on or connected to the property to be searched. The search shall also include any vehicles, as defined by VC 670, which are found on the property or under the control of persons on the property.

The search shall specifically authorize the officers of the San Bernardino County Sheriff's Department, San Bernardino County District Attorney's Office, Federal Bureau of Investigation, San Bernardino County Fire Department Arson Investigators, California Highway Patrol, and any peace officer, as defined in Chapter 4.5 of the California Penal Code, a locksmith to be supervised by law enforcement personnel during the investigation, who are summoned to assist by the affiant, to photograph and/or videotape the location being searched in order to preserve the image of the scene, the location of property, and to identify any inhabitants or persons present or arriving at the property during the search.

Search Warrant DE#

- 3 -

Warrant ID: 0000460.

Page 2 of 9

6

Case 5:20-cv-01876-JGB-SP Document 14-2 Filed 09/16/20 Page 4 of 8 Page ID #:128

**FOR THE FOLLOWING PROPERTY:**

See attachment "A"

AND TO SEIZE IT IF FOUND and bring it before me, or this court, at the courthouse of this court. This Search Warrant and Incorporated Affidavit was sworn to and subscribed before me this 2 day of September, 2020, at \_\_\_\_\_ a.m./p.m. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

NIGHT SEARCH APPROVED: ☐ YES ☐ NO

(Signature of Magistrate)

Judge of the Superior Court, High Desert Judicial District

Search Warrant DRY

- 3 -

Warrant ID: 000046028

Page 3 of 8

7

**Attachment "A"**

**Documentation:**

Any written or electronically stored documentation relating to the possession, treatment or sales of the stolen German Shepherds from [REDACTED] Lockhart Road, Hinkley CA. Also, any documentation which may indicate who the German Shepherds were sold to or placed with. To include all business or personal records documenting the above mentioned stolen German Shepherds. The German Shepherds were stolen August 8, 2020 and August 12, 2020.

**Electronic Storage Devices & Hardware**

Electronic storage devices consist of all equipment which can collect, analyze, create, display, convert, store, conceal, or transmit electronic, magnetic, optical, or similar transmission, reception, collection and storage of data. Electronic storage device includes (but is not limited to) any wireless/cellular telephone, cordless telephone, pager, fax machine, digital camera, audio recorder, video recorder and any data-processing device e.g. central processing units, memory typewriters, self-contained "laptop", "notebook", "mini-notebook", or "personal data assistant" computers. Internal and external storage devices e.g. fixed disks (hard drives), memory cards, floppy disk, LS-120, zip drive, jazz drive, Orb drive, CD drive, DVD drive, diskettes, tape drives, optical storage devices, transistor logic binary devices, and other memory storage devices including the storage media used in the devices.

Peripheral input/output device e.g. as keyboards, printers, scanners, plotters, video display monitors, optical readers.

Related communication devices e.g. modems, cables and connections, recording equipment, RAM or ROM units, acoustic couplers, automatic dialers, speed dialers, programmable telephone dialing or signaling devices, and electronic tone-generating devices. Any device, mechanism, or parts that can be used to restrict access to electronic storage devices e.g. physical keys and locks bio metric readers, retinal scanners, facial recognition, signature verification, smart card or voice authentication.

**Software**

Computer/Equipment software (digital information) can be interpreted by electronic storage device equipment, computers and any of its related components to direct the way they work. Software is stored in electronic, magnetic, optical or other digital form. It commonly includes programs to run operating systems, applications (like word-processing, graphics, or spreadsheet programs), utilities, compilers, interpreters, and communication programs.

**Documentation**

Electronic storage device documentation consists of written, recorded, printed, or electronically stored material that explains or illustrates how to configure or use electronic storage device hardware, software, or other related items.

**Passwords and Data Security Devices**

Electronic storage device passwords and other data security devices are designed to restrict access to or hide software, documentation, or data. Data security devices may consist of hardware, software, or other programming code. A password (a string of alphanumeric

**Search Warrant DR#**

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Warrant ID: 0000460;

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character) usually operates as a sort of digital key to "unlock" particular data security devices. Data security hardware may include encryption devices, chips, dongles, biometric readers, retina scanners, facial recognition systems, voice authentication systems, hand writing authentication systems and circuit boards. Data security software or digital code may include programming code that creates "test" keys or "hot" keys, which perform certain pre-set security functions when touched. Data security software or code may also encrypt, compress, hide, or "booby-trap" protected data to make it inaccessible or unusable, as well as reverse the process to restore it.

#### **Authority to Duplicate Electronic Media**

It is further requested that a forensic technician, sworn or non-sworn, be granted authorization to examine; make duplicate images/copies of the above-mentioned electronic media and to determine if evidence of the offenses enumerated above are contained therein. Therefore, authorization is requested to make images/copies of the requested data. Evidence copies of the items relating to these offenses will be created and retained for further proceedings and made available to the authorities. Only those items recovered under the Search Warrant and relating to the offenses will be retained. The master copy will be retained in evidence storage for later discovery and trial purposes.

#### **Request for Off-Site Search Authorization**

For the following reasons, the execution of this warrant may take a great deal of time and require a secure facility, special equipment, and software:

It is unknown what operating system is running the computer(s) that is subject of this warrant and, therefore, it will take time to determine how the operating system permits access to data. The amount of data that may be stored in the hard drives and removable storage devices is enormous, and the number or size of the hard drives and removable storage devices that will have to be searched pursuant to this warrant is not known.

The data to be seized may be located anywhere on the hard drives and removable storage devices, including hidden files, program files, and "deleted" files that have not been overwritten. The data may be encrypted, or inaccessible without a password, and may be protected by self-destruct programming, all of which take time to bypass. Because data stored on a computer can be destroyed or altered rather easily, either intentionally or accidentally, the search must be conducted carefully and in a secure environment. To prevent alteration of data and insure the integrity of the search, clones (master copies) of all data storage devices will be made. The clones (master copies) will then be searched and this process will take time and special equipment.

Furthermore, a lengthy on-site search may pose a severe hardship on all people who [live][work] on the premises. It would also require the presence of law enforcement officers to secure the premises while the search is being conducted, thus depleting law enforcement resources in the community.

It is therefore requested that authorization be given to remove all electronic storage devices and storage media that are found on the premises to an off-site location, with the necessary resources and equipment to conduct the search safely and efficiently. It is further requested that authorization be given to search for and seize all peripheral devices that appear to be reasonably necessary to access data stored in the electronic storage devices and storage media.

Search Warrant DR#

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**Authority to Record Scene/Evidence**

The granting of this Search Warrant shall specifically authorize the officers to photograph and/or video tape the location being searched to preserve the image of the scene, the location of property, and to identify any inhabitants or persons present or arriving at the property during the search. Investigative personnel, sworn or non-sworn are authorized to assist in the search in order identify, document and collect evidence, provided their participation is supervised by a sworn officer.

**Disposition of Evidence seized**

It is further requested that the San Bernardino County Sheriff's Department be authorized, without necessity of further Court Order:

1. To evaluate, process and download any electronic storage devices seized, to produce information from them for analysis by detectives.
2. To retain seized evidence for scientific testing and storage prior to trial. The property will then be disposed of in accordance with law and Department Policy upon adjudication of the complaint and all appeals have been made.
3. To return seized property if found to have no evidentiary value to any known victims or other subjects if such items have been photographically documented and was not directly related to forensic evidence.

Search Warrant DR#

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Warrant ID: 00004502

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**WARRANT NOTES**

(No Notes)

County of San Bernardino.

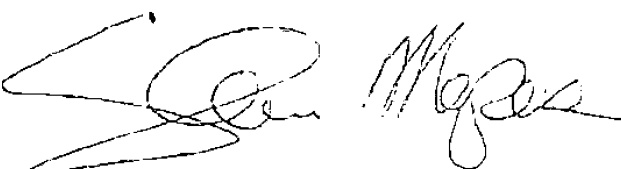
...the people of the State of California to any peace officer in the County of San Bernardino:

Proof, by affidavit, having been this day made before me by telephone by the officer whose signature is affixed to the affidavit, that there is probable cause for believing that evidence tending to show that a felony (or felonies) has or have been committed, you are therefore commanded to make search on the person and/or property set forth in the description page and/or affidavit, which is incorporated by reference herein; and, in the case of a thing or things or personal property, if you find the same or any part thereof, to bring the thing or things or personal property forthwith before me at the courthouse of this Court.

Given under my hand, and issued at 17:04 on this 2nd day of September, 2020

Hobbs Sealing Approved: NO

Night Service Approved: NO

A handwritten signature in black ink, appearing to read "Steve Mapes", is written over a horizontal line. The signature is cursive and somewhat stylized.

Judge Steve Mapes

Warrant ID: 000045029

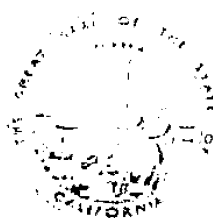
END OF WARRANT

# EXHIBIT “B”

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ORIGINAL

FIG 2



SUPERIOR COURT OF CALIFORNIA  
County of San Bernardino

Warrant  
No.

SEARCH WARRANT  
Probable Cause Warrant to Search  
(Penal Code Section 1524)

SEARCH WARRANT AND AFFIDAVIT

Report #: 082001074

AFFIDAVIT

I, Detective B. Grimm swear under oath that the facts expressed by me in the attached and incorporated Statement of Probable Cause are true and that based therein I have probable cause to believe and do believe that the articles, property, and persons described below may be lawfully seized pursuant to Penal Code Section 1524, as indicated below, and is now located at the location(s) set forth below. Wherefore, I request that this Search Warrant be issued.

  
(Signature of Affiant)

HOBBS SEALING REQUESTED:  
NIGHT SEARCH REQUESTED:

☐ YES ☒ NO  
☐ YES ☒ NO

SEARCH WARRANT

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SAN BERNARDINO: proof by affidavit, under penalty of perjury, having been made before me by Deputy B. Grimm that there is probable cause to believe that the property or person described herein may be found at the location(s) set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524 et seq., as indicated below by "☒"(s), in that:

- ☐ It was stolen or embezzled;
- ☒ It was used as the means of committing a felony;
- ☒ It is possessed by a person with the intent to use it as means of committing a public offense or is possessed by another to whom he or she may have delivered it for the purpose of concealing it or preventing its discovery;
- ☒ It tends to show that a felony has been committed or that a particular person has committed a felony;
- ☐ It tends to show that sexual exploitation of a child, in violation of Penal Code Section 311.3, or possession of matter depicting sexual conduct of a person under the age of 18 years, in violation of Section 311.11, has occurred or is occurring;
- ☐ an arrest warrant has been issued for \_\_\_\_\_ N/A \_\_\_\_\_;
- ☐ a provider of electronic communication service or remote computing service has records of evidence, as specified in Penal Code Section 1524.3, showing that property was stolen or embezzled constituting a misdemeanor, or that property or things are in possession of any person with intent to use them as a means of committing a misdemeanor public offense, or in the possession of another to whom he or she may have delivered them for the purpose of concealing them or preventing their discovery;

Search Warrant DRE

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Warrant ID: 000045384

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**PREMISES TO BE SEARCHED:**

██████████ Pier Drive, Victorville, CA 92395



██████████ Pier Drive, Victorville, CA 92395, is a single-family residence with a brown asphalt roof. The address is located on the curb on the north side of the driveway and affixed to the fascia above the garage. The residence is located on the east side of the roadway and the front door faces west.

**YOU ARE THEREFORE COMMANDED TO SEARCH:**

*The search of the above location shall include all: rooms, attics, basements, sub-basements, file cabinets, storage devices, electronic storage devices, cellular phones, smart phones, containers or compartments, surrounding grounds, any garages, out-buildings, sheds, cellars, safes, vaults and other parts therein; subterranean burial grounds, outside storage areas, storage units, bushes, easements, alleyways, trees, adjoining utility right-of-ways connected to the property, trash containers, trailers, campers, outbuildings of any kind and any place or thing not listed that could be reasonable to conceal or contain the following property and/or persons located therein, and all persons located on or at the premises. Any device or container of significant size to conceal the below listed property to be seized, that is found on or connected to the property to be searched. The search shall also include any vehicles, as defined by VC 670, which are found on the property or under the control of persons on the property.*

The search shall specifically authorize the officers of the San Bernardino County Sheriff's Department, San Bernardino County District Attorney's Office, Federal Bureau of Investigation, San Bernardino County Fire Department Arson Investigators, California Highway Patrol, and any peace officer, as defined in Chapter 4.5 of the California Penal Code, a locksmith to be supervised by law enforcement personnel during the investigation, who are summoned to assist by the affiant, to photograph and/or videotape the location being searched in order to preserve the image of the scene, the location of property, and to identify any inhabitants or persons present or arriving at the property during the search.

Search Warrant D99J

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**FOR THE FOLLOWING PROPERTY:**

See attachment "A"

**AND TO SEIZE IT IF FOUND** and bring it before me, or this court, at the courthouse of this court. This Search Warrant and Incorporated Affidavit was sworn to and subscribed before me this 4<sup>th</sup> day of SEPTEMBER, 2020, at \_\_\_\_\_ a.m./p.m. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

\_\_\_\_\_  
(Signature of Magistrate)  
Judge of the Superior Court, High Desert Judicial District

NIGHT SEARCH APPROVED: ☐ YES ☐ NO

Search Warrant ID# \_\_\_\_\_

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Warrant ID: 000045354

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**Attachment "A"**

**Documentation:**

Any written or electronically stored documentation relating to the possession, treatment or sales of the stolen German Shepherds from [REDACTED] Lockhart Road, Hinkley CA. Also, any documentation which may indicate who the German Shepherds were sold to or placed with. To include all business or personal records documenting the above mentioned stolen German Shepherds. The German Shepherds were stolen August 8, 2020 and August 12, 2020.

**Electronic Storage Devices & Hardware**

Electronic storage devices consist of all equipment which can collect, analyze, create, display, convert, store, conceal, or transmit electronic, magnetic, optical, or similar transmission, reception, collection and storage of data. Electronic storage device includes (but is not limited to) any wireless/cellular telephone, cordless telephone, pager, fax machine, digital camera, audio recorder, video recorder and any data-processing device e.g. central processing units, memory typewriters, self-contained "laptop", "notebook", "mini-notebook", or "personal data assistant" computers. Internal and external storage devices e.g. fixed disks (hard drives), memory cards, floppy disk, LS-120, zip drive, jazz drive, Orb drive, CD drive, DVD drive, diskettes, tape drives, optical storage devices, transistor-like binary devices, and other memory storage devices including the storage media used in the devices.

Peripheral input/output device e.g. as keyboards, printers, scanners, plotters, video display monitors, optical readers.

Related communication devices e.g. modems, cables and connections, recording equipment, RAM or ROM units, acoustic couplers, automatic dialers, speed dialers, programmable telephone dialing or signaling devices, and electronic tone-generating devices. Any device, mechanism, or parts that can be used to restrict access to electronic storage devices e.g. physical keys and locks bio metric readers, retinal scanners, facial recognition, signature verification, smart card or voice authentication.

**Software**

Computer/Equipment software (digital information) can be interpreted by electronic storage device equipment, computers and any of its related components to direct the way they work. Software is stored in electronic, magnetic, optical or other digital form. It commonly includes programs to run operating systems, applications (like word-processing, graphics, or spreadsheet programs), utilities, compilers, interpreters, and communication programs.

**Documentation**

Electronic storage device documentation consists of written, recorded, printed, or electronically stored material that explains or illustrates how to configure or use electronic storage device hardware, software, or other related items.

**Passwords and Data Security Devices**

Electronic storage device passwords and other data security devices are designed to restrict access to or hide software, documentation, or data. Data security devices may consist of hardware, software, or other programming code. A password (a string of alphanumeric

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characters) usually operates as a sort of digital key to "unlock" particular data security devices. Data security hardware may include encryption devices, chips, dongles, biometric readers, retina scanners, facial recognition systems, voice authentication systems, hand writing authentication systems and circuit boards. Data security software or digital code may include programming code that creates "test" keys or "hot" keys, which perform certain pre-set security functions when touched. Data security software or code may also encrypt, compress, hide, or "booby-trap" protected data to make it inaccessible or unusable, as well as reverse the process to restore it.

#### **Authority to Duplicate Electronic Media**

It is further requested that a forensic technician, sworn or non-sworn, be granted authorization to examine, make duplicate images/copies of the above-mentioned electronic media and to determine if evidence of the offenses enumerated above are contained therein. Therefore, authorization is requested to make images/copies of the requested data. Evidence copies of the items relating to these offenses will be created and retained for further proceedings and made available to the authorities. Only those items recovered under the Search Warrant and relating to the offenses will be retained. The master copy will be retained in evidence storage for later discovery and trial purposes.

#### **Request for Off-Site Search Authorization**

For the following reasons, the execution of this warrant may take a great deal of time and require a secure facility, special equipment, and software:

It is unknown what operating system is running the computer(s) that is subject of this warrant and, therefore, it will take time to determine how the operating system permits access to data. The amount of data that may be stored in the hard drives and removable storage devices is enormous, and the number or size of the hard drives and removable storage devices that will have to be searched pursuant to this warrant is not known.

The data to be seized may be located anywhere on the hard drives and removable storage devices, including hidden files, program files, and "deleted" files that have not been overwritten. The data may be encrypted, or inaccessible without a password, and may be protected by self-destruct programming, all of which take time to bypass. Because data stored on a computer can be destroyed or altered rather easily, either intentionally or accidentally, the search must be conducted carefully and in a secure environment. To prevent alteration of data and insure the integrity of the search, clones (master copies) of all data storage devices will be made. The clones (master copies) will then be searched and this process will take time and special equipment.

Furthermore, a lengthy on-site search may pose a severe hardship on all people who [live][work] on the premises. It would also require the presence of law enforcement officers to secure the premises while the search is being conducted, thus depleting law enforcement resources in the community.

It is therefore requested that authorization be given to remove all electronic storage devices and storage media that are found on the premises to an off-site location, with the necessary resources and equipment to conduct the search safely and efficiently. It is further requested that authorization be given to search for and seize all peripheral devices that appear to be reasonably necessary to access data stored in the electronic storage devices and storage media.

Search Warrant DR#

- 5 -

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**Authority to Record Scene/Evidence**

The granting of this Search Warrant shall specifically authorize the officers to photograph and/or video tape the location being searched to preserve the image of the scene, the location of property, and to identify any inhabitants or persons present or arriving at the property during the search. Investigative personnel, sworn or non-sworn are authorized to assist in the search in order identify, document and collect evidence, provided their participation is supervised by a sworn officer.

**Disposition of Evidence seized**

It is further requested that the San Bernardino County Sheriff's Department be authorized, without necessity of further Court Order:

1. To evaluate, process and download any electronic storage devices seized, to produce information from them for analysis by detectives.
2. To retain seized evidence for scientific testing and storage prior to trial. The property will then be disposed of in accordance with law and Department Policy upon adjudication of the complaint and all appeals have been made.
3. To return seized property if found to have no evidentiary value to any known victims or other subjects if such items have been photographically documented and was not directly related to forensic evidence.

Search Warrant DR#

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**WARRANT NOTES**

(No Notes)

County of San Bernardino.

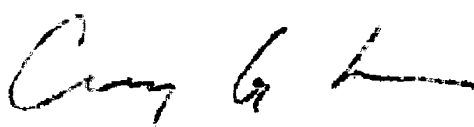
The people of the State of California to any peace officer in the County of San Bernardino:

Proof, by affidavit, having been this day made before me by telephone by the officer whose signature is affixed to the affidavit, that there is probable cause for believing that evidence tending to show that a felony (or felonies) has or have been committed, you are therefore commanded to make search on the person and/or property set forth in the description page and/or affidavit, which is incorporated by reference herein; and, in the case of a thing or things or personal property, if you find the same or any part thereof, to bring the thing or things or personal property forthwith before me at the courthouse of this Court.

Given under my hand, and issued at 11:59 on this 9th day of September, 2020

Hobbs Sealing Approved: NO

Night Service Approved: NO

A handwritten signature in black ink, appearing to read "Corey G Lee", is written within a rectangular box.

Judge Corey G Lee

Warrant ID: 000045354

END OF WARRANT

# EXHIBIT “C”

## 4. APPLICATION AND AFFIDAVIT FOR SEARCH WARRANT

STATE OF NEVADA )  
County of Clark ) ss:

Detective A. Antoniewicz, being first duly sworn, deposes and states that he is the Affiant herein and is a Detective with the North Las Vegas Police Department presently assigned to investigate Possession of Stolen Property. The Affiant has been employed with the North Las Vegas Police Department for the past 18 years and has been assigned to the Detective Bureau for the past 13 years.

That there is probable cause to believe that certain property hereinafter described will be found at the following premises, to wit:

■ Pine Blossom, North Las Vegas, NV 89031, County of Clark, State of Nevada. More particularly described as a two story, single family residence, that is tan in color with brown trim. The numbers ■ are posted in black numbers on the south side of the residence, east of the garage door. The front door of the residence is brown in color and faces south.

**The property referred to and sought to be seized consists of the following:**

**Documentation:**

Any written or electronically stored documentation relating to the possession, treatment or sales of the stolen German Shepherds from [REDACTED] Lockhart Road, Hinkley CA. Also, any documentation which may indicate who the German Shepherds were sold to or placed with. To include all business or personal records documenting the above mentioned stolen German Shepherds. Affiant also requests to include any personal electronic devices which may contain evidence proving the theft or possession of the stolen German shepherds. The German Shepherds were stolen August 8, 2020 and August 12, 2020.

## Electronic Storage Devices & Hardware

Electronic storage devices consist of all equipment which can collect, analyze, create, display, convert, store, conceal, or transmit electronic, magnetic, optical, or similar transmission, reception, collection and storage of data. Electronic storage device includes (but is not limited to) any wireless/cellular telephone, cordless telephone, pager, fax machine, digital camera, audio recorder, video recorder and any data-processing device e.g. central processing units, memory typewriters, self-contained "laptop", "notebook", "mini-notebook", or "personal data assistant" computers. Internal and external storage devices e.g. fixed disks (hard drives), memory cards, floppy disk.

LS-120, zip drive, jazz drive, Orb drive, CD drive, DVD drive, diskettes, tape drives, optical storage devices, transistor-like binary devices, and other memory storage devices including the storage media used in the devices.

Peripheral input/output device e.g. as keyboards, printers, scanners, plotters, video display monitors, optical readers.

Related communication devices e.g. modems, cables and connections, recording equipment, RAM or ROM units, acoustic couplers, automatic dialers, speed dialers, programmable telephone dialing or signaling devices, and electronic tone-generating devices. Any device, mechanism, or parts that can be used to restrict access to electronic storage devices e.g. physical keys and locks bio metric readers, retinal scanners, facial recognition, signature verification, smart card or voice authentication.

#### **Software**

Computer/Equipment software (digital information) can be interpreted by electronic storage device equipment, computers and any of its related components to direct the way they work. Software is stored in electronic, magnetic, optical or other digital form. It commonly includes programs to run operating systems, applications (like word-processing, graphics, or spreadsheet programs), utilities, compilers, interpreters, and communication programs.

#### **Documentation**

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#### **Passwords and Data Security Devices**

Electronic storage device passwords and other data security devices are designed to restrict access to or hide software, documentation, or data. Data security devices may

consist of hardware, software, or other programming code. A password (a string of alphanumeric characters) usually operates as a sort of digital key to "unlock" particular data security devices. Data security hardware may include encryption devices, chips, dongles, biometric readers, retina scanners, facial recognition systems, voice authentication systems, hand writing authentication systems and circuit boards. Data security software or digital code may include programming code that creates "test" keys or "hot" keys, which perform certain pre-set security functions when touched. Data security software or code may also encrypt, compress, hide, or "booby-trap" protected data to make it inaccessible or unusable, as well as reverse the process to restore it.

That Affiant is satisfied that there is probable cause to believe that said property is located as set forth above and that based upon the Affidavit attached hereto there are sufficient grounds for the issuance of a Search Warrant.

The property described constitutes evidence which tends to demonstrate the criminal offense of Possession of Stolen Property, has been committed at the premises to be searched in violation of Nevada Revised Statute 205.275.

In support of your Affiant's assertion to constitute the existence of probable cause the following facts are offered based on Affiant's personal knowledge and on information and belief.

On August 31, 2020, Affiant received correspondence from North Las Vegas Police Department Sergeant Nellie to contact San Bernardino County Sheriff's Department in reference to assistance needed in our jurisdiction.

On September 1, 2020, Affiant contacted Detective Brian Grimm (employee #E3908), who was the lead investigator on a grand larceny case that occurred in their jurisdiction (SBCSD case #082001074). Detective Grimm needed assistance in obtaining a search warrant for [REDACTED] the Blossom in North Las Vegas. Detective Grimm provided the following facts for the case:

On Saturday, August 8, 2020, San Bernardino County Sheriff's deputies responded to [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[illegible]

WHEREFOR, Affiant requests that a Search Warrant be issued directing a search for and seizure of the aforementioned items at the location set forth herein and authorizing a day time search between the hours of 7:00 a.m. and 7:00 p.m.

**A. Antoniewicz,**

SUBSCRIBED and SWORN to before me by  
A. Antoniewicz this 10 day of September, 2020.

## JUDGE



# SEARCH WARRANT

STATE OF NEVADA )  
 )  
County of Clark )

The State of Nevada, to any Peace Officer in the County of Clark. Proof by Application and Affidavit for Search Warrant having been made before me by Detective [Affiant] said Application and Affidavit for Search Warrant incorporated herein by reference, that there is probable cause to believe that certain property, namely:

### Documentation:

Any written or electronically stored documentation relating to the possession, treatment or sales of the stolen German Shepherds from [REDACTED] Lookhart Road, Hinkley CA. Also, any documentation which may indicate who the German Shepherds were sold to or placed with. To include all business or personal records documenting the above mentioned stolen German Shepherds. Affiant also requests to include any personal electronic devices which may contain evidence proving the theft or possession of the stolen German shepherds. The German Shepherds were stolen August 8, 2020 and August 12, 2020.

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optical storage devices, transistor-like binary devices, and other memory storage devices including the storage media used in the devices.

Peripheral input/output device e.g. as keyboards, printers, scanners, plotters, video display monitors, optical readers.

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alphanumeric characters) usually operates as a sort of digital key to "unlock" particular data security devices. Data security hardware may include encryption devices, chips, dongles, biometric readers, retina scanners, facial recognition systems, voice authentication systems, hand writing authentication systems and circuit boards. Data security software or digital code may include programming code that creates "test" keys or "hot" keys, which perform certain pre-set security functions when touched. Data security software or code may also encrypt, compress, hide, or "booby-trap" protected data to make it inaccessible or unusable, as well as reverse the process to restore it.

is presently located at:

■ Pine Blossom, North Las Vegas, NV 89031, County of Clark, State of Nevada. More particularly described as a two story, single family residence, that is tan in color with brown trim. The numbers ■ are posted in black numbers on the south side of the residence, east of the garage door. The front door of the residence is brown in color and faces south.

and I am satisfied that there is probable cause to believe that said property located as set forth above that based upon the Application and Affidavit for Search Warrant there are sufficient grounds for the issuance of the Search Warrant.

You are hereby commanded to search forthwith said premises for said property, serving this Search Warrant between the hours of 7:00 a.m. and 7:00 p.m. at ■ Pine Blossom, North Las Vegas, NV 89031. As set forth in the Application and Affidavit for Search Warrant in support hereto, and if the property there to seize it, prepare a written inventory of the property seized and make a return for me within ten (10) days.

Dated this 10 day of September, 2020.

JUDGE



Alla Zorikova

1905 Wilcox Av., #175

Los Angeles, CA 90068

3232095186

Olivia.car@mail.ru

**EIGHT JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ALLA ZORIKOVA,  .  JULIE PYLE, TAMMY WILLET, CASEY GISH, VEGAS SHEPHERD RESCUE AND DOES I THROUGH X, INDIVIDUALS, AND ROE BUSINESS ENTITIES I THROUGH X,  s	: A-20-821249-C  PLAINTIFF'S MOTION FOR LEAVE OF COURT TO AMEND COMPLAINT BY ADDIING DEFENDANTS  Department 20  HEARING REQUESTED
---	---

**COMES NOW, the PLAINTIFF ALLA ZORIKOVA** appearing *pro per* and submits  
following motion.

Plaintiff Alla Zorikova respectfully asks this Court to add to this case the following Defendants:

1. SNARL (Southern Nevada Animal Rescue League), business entity

Clark County, Las Vegas, NV

2. CHELSEA WARD/MOOR, individual, president of SNARL

Clark County, Las Vegas, NV

3. Vegas Pet Rescue Project, business entity

7817 Seychelles Ct.,

Las Vegas, NV 89129

4. CASEY GISH, individual, board member of Vegas Pet Rescue (Exhibit 1)

Project.

5940, S Rainbow Blvd.,

Las Vegas, NV 89118

#### STATEMENT OF FACTS

5. There is ongoing criminal investigation on the allegedly stolen my 25 german shepherd dogs conducted by detectives of San Bernardino Sheriff Department (the true and correct copy of attached thereto "Declaration of Detective Grimm" as Exhibit 5\_).

6. No criminal charges has ever been filed by District Attorney against Plaintiff, further, Plaintiff does not have any criminal records.

7. On August 09, 10, 17 of 2020 and in October of 2020 Animal Control Personel visited Plaintiff's Dog training private property and had found in all 4 visits all Plaintiff's Dogs in good

health, not distressed, all having shelter and water, the true and correct copy of AC Report attached thereto as (Exhibit 6 ) and therefore, never had legal reason to take Plaintiff's Dogs.

8. Animal Control's personnel Tara Campos, Desiree Molina and Christy Hamrick stated to Plaintiff that half dogs were missing when they arrived on August 10th of 2020 to the San Bernardino's Plaintiff's private property and AC officers had provided Plaintiff with all evidences they had and found regarding who stole the missing dogs and puppies on August 09 of 2020.

9. San Bernardino County Sheriff's Detectives conducted searches and seized property in suspect's Lamie Gregory and others homes in California and Nevada in September of 2020 (Exhibit 5).

10. Investigation is still ongoing; however, some admissions to Detectives have been made by Defendants during the investigation (the true and correct copy of case attached thereto as CASE NO. 5:20-cv-01876-JGB-SPx Exhibit 2,3).

11. SNARL admitted receiving 20 of my dogs ( the true and correct copy of case attached thereto as CASE NO. 5:20-cv-01876-JGB-SPx Exhibit 4)

12. The following has been admitted as fact in the Second Amended Complaint filed by Defendants (in this case) against San Bernardino County and detectives and State's response, Declaration of Detective Grimm, (Exhibit7\_ ):

a). Sheriff's Department did NOT authorize anyone, nor any rescues to take the Plaintiff's Dogs.(the true and correct copy of case attached thereto as CASE NO. 5:20-cv-01876-JGB-SPx (Exhibit 1))

b). SNARL took without authorization Plaintiff's dogs (about 20 of those) from San Bernardin County in August of 2020.

c). Defendants stated that the dogs are not in their possession any longer.

d). Defendants were inquired by Detectives as where they placed the stolen dogs and Defendants refused to state to Detectives where the dogs have been placed as well as they refused to show any documentation related to placement.

Plaintiff had case filed in the same court against J. Gregory, Vegas Pet Rescue Project and Casey Gish (case # A-20-820761C ); however, that case was on stay upon Defendant's request and was dismissed without prejudice and without Plaintiff's knowledge.

#### MEMORANDUM OF LAW

#### Nevada Rules of Civil Procedures

#### RULE 15. AMENDED AND SUPPLEMENTAL PLEADINGS

(a) Amendments. A party may amend the party's pleading once as a matter of course at any time before a responsive pleading is served or, if the pleading is one to which no responsive pleading is permitted and the action has not been placed upon the trial calendar, the party may so amend it at any time within 20 days after it is served. Otherwise a party may amend the party's pleading only by leave of court or by written consent of the adverse party; and leave shall be freely given when justice so requires. A party shall plead in response to an amended pleading within the time remaining for response to the original pleading or within 10 days after service of the amended pleading, whichever period may be the longer, unless the court otherwise orders.

#### CONCLUSION

Based on the fact that J.Gregory, Chelsea Ward and C. Gish as individuals and, as individuals and board's members of Vegas Pet Rescue Project, SNARL admitted once possession of Plaintiff's dogs and for judicial efficiency, I, Alla Zorikova, respectfully ask this Court to add listed above Defendants to this matter based on the same causes of actions and relation to the facts and Defendants in this current case.

Respectfully submitted, ALLA ZORIKOVA



#### CERTIFICATE OF SERVICE

I, Alla Zorikova, certify that on May 28 of 2021 I had emailed the copy of the same to Casey Gish, Jamie Gregory,

Dated: May 28 of 2020

Respectfully submitted, ALLA ZORIKOVA

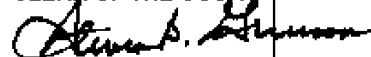




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**DISTRICT COURT  
CLARK COUNTY, NEVADA  
\*\*\*\***

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Steven D. Grierson  
CLERK OF THE COURT



Alla Zorikova, Plaintiff(s)  
vs.  
Julie Pyle, Defendant(s)

Case No.: A-20-821249-C  
Department 20

**NOTICE OF HEARING**

Please be advised that the Plaintiff's Motion for Leave of Court to Amend Complaint by Adding Defendants in the above-entitled matter is set for hearing as follows:

**Date:** June 30, 2021  
**Time:** 10:30 AM  
**Location:** RJC Courtroom 12A  
Regional Justice Center  
200 Lewis Ave.  
Las Vegas, NV 89101

**NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.**

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Joshua Raak  
Deputy Clerk of the Court

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

By: /s/ Joshua Raak  
Deputy Clerk of the Court

AOS

1 Alla Zorikova  
 2 (Your Name)  
 3 1905 Wilcox Ave. #125  
 4 (Your Mailing Address)  
 5 LA, CA 90068  
 6 (Your City, State, Zip Code)  
 7 3232095186  
 8 (Your Telephone Number)

9 (Your E-mail Address)  
 10 olivia.cara@mail.ru  
 11 Plaintiff, Self-Represented

EIGHTH JUDICIAL DISTRICT COURT  
 CLARK COUNTY, NEVADA

12 Plaintiff's Name: Zorikova  
 13 Plaintiff,

Case No.: A-20-821248-C  
 Dept. No.: 20

14 Defendant's Name: Pyle et al  
 15 Defendant.

## AFFIDAVIT/DECLARATION OF SERVICE UNDER PENALTY OF PERJURY

16 (Insert name of person performing service) Olivia Jeong, being duly  
 17 sworn or under penalty of perjury, states that at all times relevant, I was over 18 years of age and not a  
 18 party to or interested in the above-captioned case; that I served a copy of the ☒ Summons, ☒ Complaint,  
 19 ☐ Other (specify) \_\_\_\_\_ on (insert date and  
 20 time you served) 10/20, 20 20, at the hour of 1 P.M., on Defendant (insert Defendant's  
 21 name) J. PYLE by the

22 following method (complete appropriate paragraph below):

23 ☐ **Personal service per NRCPC 4.2(a)(1):** Delivering and leaving a copy with (insert  
 24 Defendant's name) \_\_\_\_\_ at (insert address at  
 25 which you served) \_\_\_\_\_

26  
 27  
 28

Page 1 of 2

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1 ☒ **Substitute service per NRCPC 4.2(a)(2):** Delivering and leaving a copy with (insert name or  
 2 physical description of person served) Reception, lady brown hair about 60 y.o, a person of suitable age  
 3 and discretion residing at Defendant's dwelling house or usual place of abode, at (insert Defendant's address)  
 4 2620 Rosetta Dr., #102, Las Vegas, NV 89128  
 5 ☐ **Service on a business entity per NRCPC 4.2(c)(1)(A):** Delivering and leaving a copy  
 6 with (insert name or physical description of person served) \_\_\_\_\_  
 7 who is Defendant's (check one) ☐ registered agent, ☐ officer or director, ☐ partner, ☐ member, ☐ manager,  
 8 ☐ trustee, or ☒ other (specify) Receptionist, at (insert address at which you served)  
 9 2620 Rosetta Dr., #102, Las Vegas, NV 89128  
 10 ☐ **Other method of service authorized by Nevada statute or court rule:**  
 11  
 12

13 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAW OF THE STATE OF  
 14 NEVADA THAT THE FOREGOING IS TRUE AND CORRECT.

15 SERVER'S SIGNATURE: [Signature] Date: 10/20/20

16 Server's Phone: \_\_\_\_\_

17 Server's ☐ Residential/ ☒ Business Address: 1905 Wilcox Ave. #125 LA, CA, 90068

18 ☐ I am a licensed process server or an employee of a licensed process server; my license or registration  
 19 number is (insert license or registration number): \_\_\_\_\_

20 ☒ I am not required to be licensed under chapter 648 of the Nevada Revised Statutes or another  
 21 provision of law because am not engaged in the business of serving legal process within the State of  
 22 Nevada.

Page 2 of 2

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Steven D. Gilman  
CLERK OF THE COURT

1 AOS  
2 Alla Zorikova  
3 (Your Name)  
4 1905 Wilcox Ave, #175  
5 (Your Mailing Address)  
6 Las Vegas, NV 89102  
7 (Your City, State, Zip Code)  
8 5232085186  
9 (Your Telephone Number)  
10  
11 (Your Fax Number)  
12 Olivia.CAR@mail.ru  
13 (Your E-mail Address)  
14 Plaintiff, Self-Represented  
15  
16 EIGHTH JUDICIAL DISTRICT COURT  
17 CLARK COUNTY, NEVADA  
18  
19 Plaintiff's Name: Zorikova Case No: A-20-821248-C  
20 Dept. No: 20  
21 vs.  
22 Defendant's Name: Pyle et al  
23 Defendant  
24  
25 AFFIDAVIT/DECLARATION OF SERVICE UNDER PENALTY OF PERJURY  
26 (Insert name of person performing service) Olivia Jeong, being duly  
27 sworn or under penalty of perjury, states that at all times relevant, I was over 18 years of age and not a  
28 party to or interested in the above-captioned case; that I served a copy of the ☒ Summons, ☒ Complaint,  
29 ☐ Other (specify) DECK 09 on (insert date and  
30 time you served) 10/20, 2020, at the hour of 1 p.m., on Defendant (insert Defendant's  
31 name) Tammy Willet by the  
32 following method (complete appropriate paragraph below).  
33 ☐ Personal service per NRCPC 4.2(a)(1): Delivering and leaving a copy with (insert  
34 Defendant's name) \_\_\_\_\_ at (insert address at  
35 which you served) \_\_\_\_\_  
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Page 1 of 2  
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☒ Substitute service per NRCPC 4.2(a)(2): Delivering and leaving a copy with (insert name or  
physical description of person served) Receptionist, Lady Brown, a person of suitable age  
and discretion residing at Defendant's dwelling house or usual place of abode, at (insert Defendant's address)  
2620 Regatta Dr, #102, Las Vegas, NV 89128  
☐ Service on a business entity per NRCPC 4.2(c)(1)(A): Delivering and leaving a copy  
with (insert name or physical description of person served) \_\_\_\_\_  
who is Defendant's (check one) ☐ registered agent, ☐ officer or director, ☐ partner, ☐ member, ☐ manager,  
☐ trustee, or ☒ other (specify) receptionist, at (insert address at which you served)  
2620 Regatta Dr, #102, Las Vegas, NV 89128  
☐ Other method of service authorized by Nevada statute or court rule.  
I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAW OF THE STATE OF  
NEVADA THAT THE FOREGOING IS TRUE AND CORRECT.  
SERVER'S SIGNATURE: [Signature] Date: 10/20/20  
Server's Phone: \_\_\_\_\_  
Server's ☐ Residential/ ☒ Business Address: 1905 Wilcox Ave #175 L.A.  
☐ I am a licensed process server or an employee of a licensed process server; my license or registration  
number is (insert license or registration number) \_\_\_\_\_  
☒ I am not required to be licensed under chapter 648 of the Nevada Revised Statutes or another  
provision of law because am not engaged in the business of serving legal process within the State of  
Nevada.  
Page 2 of 2  
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AOS

1 Alla Zorikova  
2 (Your Name)  
3 1905 Wilcox Ave #175  
4 (Your Mailing Address)  
5 LA CA 90068  
6 (Your City, State, Zip Code)  
7 3232095186  
8 (Your Telephone Number)  
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Olivia-CARA mail.RU  
(Your E-mail Address)  
Plaintiff, Self-Represented

EIGHTH JUDICIAL DISTRICT COURT  
CLARK COUNTY, NEVADA

Plaintiff's Name: Zorikova  
vs.  
Defendant's Name: Pyle et al  
Plaintiff.  
Defendant.

Case No.: A-20-821241-C  
Dept. No.: 20

**AFFIDAVIT/DECLARATION OF SERVICE UNDER PENALTY OF PERJURY**

(Insert name of person performing service) Olivia Jeong, being duly sworn or under penalty of perjury, states that at all times relevant, I was over 18 years of age and not a party to or interested in the above-captioned case; that I served a copy of the ☒ Summons, ☒ Complaint,

☐ Other (specify) \_\_\_\_\_ on (insert date and time you served) 10/9, 2020, at the hour of 1 P.M., on Defendant (insert Defendant's name) J. PYLE by the

following method (complete appropriate paragraph below):

☐ **Personal service per NRCP 4.2(a)(1):** Delivering and leaving a copy with (insert Defendant's name) \_\_\_\_\_ at (insert address at which you served) \_\_\_\_\_

Page 1 of 2

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☒ **Substitute service per NRCP 4.2(a)(2):** Delivering and leaving a copy with (insert name or physical description of person served) Reception, lady brown hair about 50 y.o, a person of suitable age and discretion residing at Defendant's dwelling house or usual place of abode, at (insert Defendant's address)

2620 Rosetta Dr., #102, Las Vegas, NV 89128

☐ **Service on a business entity per NRCP 4.2(c)(1)(A):** Delivering and leaving a copy with (insert name or physical description of person served) \_\_\_\_\_

who is Defendant's (check one) ☐ registered agent, ☐ officer or director, ☐ partner, ☐ member, ☐ manager, ☐ trustee, or ☒ other (specify) Receptionist, at (insert address at which you served)

2620 Rosetta Dr., #102, Las Vegas, NV 89128

☐ **Other method of service authorized by Nevada statute or court rule:** \_\_\_\_\_

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAW OF THE STATE OF NEVADA THAT THE FOREGOING IS TRUE AND CORRECT.

SERVER'S SIGNATURE: [Signature] Date: 10/20/20

Server's Phone: \_\_\_\_\_ Server's ☐ Residential/ ☒ Business Address: 1905 Wilcox Ave #175 LA, CA, 90068

☐ I am a licensed process server or an employee of a licensed process server, my license or registration number is (insert license or registration number): \_\_\_\_\_

☒ I am not required to be licensed under chapter 648 of the Nevada Revised Statutes or another provision of law because am not engaged in the business of serving legal process within the State of Nevada

Page 2 of 2

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Alla Zorikova

1905 Wilcox Av., #175

Los Angeles, CA 90068

3232095186

Olivia.car@mail.ru

**EIGHT JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ALLA ZORIKOVA,  PLAINTIFF,  JULIE PYLE, TAMMY WILLET, VEGAS SHEPHERD RESCUE AND DOES I THROUGH X, INDIVIDUALS, AND ROE BUSINESS ENTITIES I THROUGH X,  DEFENDANTS	: A-20-821249-C  PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT AND PLAINTIFF'S DECLARATION IN SUPPORT  Under NRCP 55 (b)(2)  Department 20  HEARING REQUESTED
--	---

COMES NOW Plaintiff, Alla Zorikova, and pursuant to NRCP 55 (b)(2) respectfully asks this Court to enter the Default Judgment against Defendants and each of them.

1. Plaintiff had filed her Complaint against Defendants, and each of them on 09/24/2020

2. Defendants Pyle, Willet, Vegas Shepherd Rescue have been duly served via personal service on October 09 of 2020.
3. Today is June 06 of 2021.
4. Defendants and each of them failed to plead or otherwise defend.
5. The time for Defendants to answer or otherwise response have expired.
6. CONCLUSION
7. Plaintiff Alla Zorikova respectfully asks this Court to enter the Default Judgment against the Defendants and each of them and to schedule Hearing for Determination of sum amount for damages in excess of \$15,000.00.

Respectfully,



06/06/2021

#### PLAINTIFF'S DECLARATION


I, Alla Zorikova, declare as follows:

I have personal knowledge of the following and if called upon to testify as witness I could and would competently testify to the facts set forth in this declaration

1. The Complaint has been filed against Defendants on 09/24/2020-
2. The Complaint has been personally served on Defendants on October 09 of 2020 by qualified server.
3. Defendants and each of them failed to plead or otherwise defend.

4. I did not receive the answer to the Complaint or other responsive pleadings from Defendants, and each of them as on today's date June 6th of 2021.

I declare under penalty of perjury under the law of State of Nevada that the

foregoing is true and correct. 

Alla Zorikova 06/06/2021

#### PROOF OF SERVICE

I certify that I had emailed to Bryan Pease the copy of the same on October 20 of 2020.

Respectfully submitted, ALLA ZORIKOVA

06/06/2021





Alla Zorikova

1905 Wilcox Av., #175

Los Angeles, CA 90068

3232095186

Olivia.car@mail.ru

**EIGHT JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ALLA ZORIKOVA,  PLAINTIFF,  JULIE PYLE, TAMMY WILLET, VEGAS SHEPHERD RESCUE AND DOES I THROUGH X, INDIVIDUALS, AND ROE BUSINESS ENTITIES I THROUGH X,  DEFENDANTS	: A-20-821249-C  PROOF OF SERVICE FOR PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT AND PLAINTIFF'S DECLARATION IN SUPPORT  Department 20
--	--

**PROOF OF SERVICE**

I certify that I had emailed to Casey Gish the Plaintiff's Motion for Entry of Default Judgment for Defendants and each of them and Declaration in support on June 06 of 2021 .

Respectfully submitted, ALLA ZORIKOVA

06/06/2021

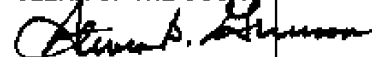




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DISTRICT COURT  
CLARK COUNTY, NEVADA  
\*\*\*\*

Electronically Filed  
6/9/2021 7:49 AM  
Steven D. Grierson  
CLERK OF THE COURT



Alla Zorikova, Plaintiff(s)  
vs.  
Julie Pyle, Defendant(s)

Case No.: A-20-821249-C  
Department 20

**NOTICE OF HEARING**

Please be advised that the Plaintiff's Motion for Default Judgment and Plaintiff's Declaration in Support in the above-entitled matter is set for hearing as follows:

**Date:** July 14, 2021  
**Time:** 8:30 AM  
**Location:** RJC Courtroom 12A  
Regional Justice Center  
200 Lewis Ave.  
Las Vegas, NV 89101

**NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.**

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Chaunte Pleasant  
Deputy Clerk of the Court

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

By: /s/ Chaunte Pleasant  
Deputy Clerk of the Court



<b>A20-172252-1</b>		<b>ASSIST/POLICE</b>	Priority Level: 3	Total Animals: 20	Animal Type: DC
Activity Address: LOCKHART RD		RED MOUNTAIN			
Activity Comment: O-67 87 W/ DEP ALEXANDER. WILL DIRECT TO ADDRESS FOR ASSIST. LOG# BA022.					
<b>Caller Information:</b>					
Officer: P999067		CHAVEZ	Clerk: B4869		
Call Date:	08/08/20 02:02 PM				
New Date:	08/08/20 02:02 PM				
Dispatch Date:	08/08/20 02:30 PM				
Working Date:	08/08/20 04:13 PM				
Complete Date:	08/08/20 04:21 PM				
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> <b>Result Codes:</b>            1 RSVD         </div>					

**Memo:**

08/17/20 Myself and O-94 MC with the owner and her daughter. The owner drove us to a Government owned spring where they get their water. She then walked us around the property and showed us all the dogs who all had water and shelter. She stated she picks up left over meat from Barstow Country Butcher daily for the dogs food. The address to the property is 1370 Trump Rd, but it does not come up on the map yet. I took pictures and put them in O-67 folder. H9045/0-85

8/8/20 O-67 arrived to the call and said all dogs had water and shade. O-67 said all dogs were healthy and normal. He said there were 50+ dogs on the ppty and they all had water and shade in their cages. O-67 said the dog owner was going to be arrested for 597 due to the Deputy's not viewing water and shade. I told O-67 we weren't going to impound the dogs today. I told him to make sure the dogs have water and we will return on 8/9 to ensure the dogs still have water and aren't in distress. We hung up the phone. O-67 called me back asking about under age pups on the ppty. I asked to talk to an Officer on the ppty, the phone was handed to a SGT. I was unable to get his name due to the fact he was so upset we weren't impounding dogs. I listened to him about how he is leaving and didn't care what animal control does or doesn't do. I told O-67 to post the ppty and impound all under age pups that didn't have a mother. I called O-67 back to make sure SO knew ACC wouldn't pay for the cost of the dogs or any of the fees that incur. He put me on the phone with officer Parsons, I explained to her Sheriff Dpt will have to pay for all the cost of the dogs. She went on a rant about how she doesn't care she is only there to uphold her officer oath. I was able to explain to her we were not picking up 50+ dogs today and we would return each day to water and feed to ensure none of them go into distress, until we make arrangements to impound all 50+ dogs. B4869

8/8/20 I M/C with S/O and was able to see many dogs in plain view on property. The dogs were all large G. Sheps were in pens with shade cloth. All the G. sheps had shade and shelter all had little water. None of the dogs appear to be in distress and all appear to be healthy and normal, S/O and dog owner gave the dogs water. There were 12 pups unknown which of the female dogs was the mother. Per O-99/ O-90 the pups were to be impounded and the property is to be posted for 24 hr abandonment. I posted the front gate, side gate, and the little house/shack @ 16:20 for 48 G- Sheps per S/O they arrested dog owner for 597 animals in distress. ...pic in O-67 folder.....c3865

8/8/20 directions to the property.: hwy15 north to hwy 58 west, go north on Haper lake Rd for about 6.8 mi. you will then turn left on Hoffman Rd till paved rd. at end of paved rd go right for about 4.1 mi at the pole with blue ribbon go left for 0.1 mil first dirt rd go right for 0.8 mil then left at the red pole the prop will be to your right....c3865

08/09/20 I met with Dep Parson's and we fed and watered the dogs. All of O-67 notices were still up and the dogs were still on the property. I counted at least 63 dogs but they were hiding in the dens so it was hard to get a full count. I posted 7 ON over at Hoffman rd X Hoffman Rd and as I drove down Hoffman Rd to Harper Valley Lake rd and there was a lifted black Dodge Ram 2500 or 3500 with a man and a woman in it followed by a larger white van with German shep stickers on it. I tried to talk to them but they would not speak with me and drove East on Hoffman Rd. I did not get the lic plate numbers for the truck but I did get a partial plate on the van. The first 3 letters were "AKC". I was unable to take pictures as my camera was overheating and not working properly H9045/0-85

08/11/20 I took pictures and noticed a significant amount of dogs were missing and the chicken was gone. O-55/Stevens counted 25 dogs on the property. We impounded 1 dog that was stuck under fencing trying to get shade under a board. While pulling in Lt. Molina noticed goats on the North/East corner/side of the property line. I went to go check and there was a male Nigerian dwarf goat tied with a collar and chain to the ground as well as a Nubian/Alpine mix female goat who was also tied down by a collar and chain. Neither goat had food water or shelter. We put both goats in the truck and gave them water. 25 dogs and 2 goats where impounded in total. Lt Molina was then leaving the property and a white van with German shep stickers and advertising of rescues pulled up. Lt Molina asked why they were there and the woman stated this was the first time she was out here and Lt. Molina took down her lic plate which was "AKC GSD" and there was a phone number on the side of the van "909-297-6217". The woman would not give any more information and drove away. All pictures are in O-67 folder. h9045/0-85

ATTACHMENT 3



ATTACHMENT 4



**Vegas Shepherd Rescue**

Beacon · Aug 12 ·

[View Full Size](#) · [More Options](#)

Like

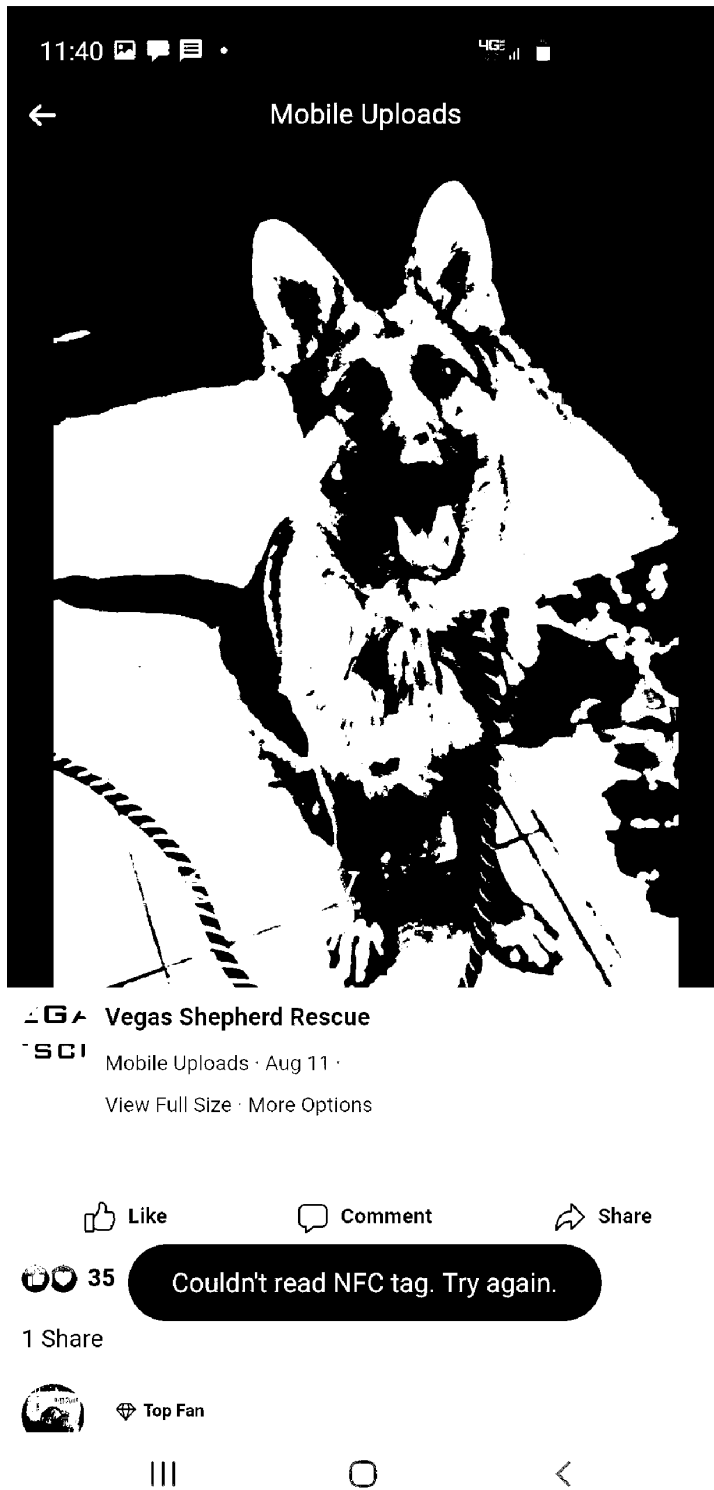
Comment

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5

Write a comment...

ATTACHMENT 5



ATTACHMENT 6




**Vegas Shepherd Rescue**

Mobile Uploads · Aug 11 ·

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 42

1 Share

 **Top Fan**



ATTACHMENT 7






**Vegas Shepherd Rescue**

Mobile Uploads · Aug 11 ·

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 **Top Fan**



ATTACHMENT 8

12:05



4G

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Mobile Uploads



Look

 Vegas Shepherd Rescue

Mobile Uploads · Aug 11 ·

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ATTACHMENT 8



ATTACHMENT 9





1 **NOAC**  
2 SHANA D. WEIR, ESQ.  
3 Nevada Bar No. 9468  
4 **WEIR LAW GROUP, LLC**  
5 6220 Stevenson Way  
6 Las Vegas, NV 89120  
7 (702) 509-4567 Telephone

8 *Attorneys for Defendants Julie Pyle, Tammy*  
9 *Willet, & Vegas Shepherd Rescue*

10 **DISTRICT COURT**

11 **CLARK COUNTY, NEVADA**

12 ALLA ZORIKOVA;

CASE NO. A-20-821249-C  
DEPT. NO. XX

13 Plaintiff(s),

14 vs.

15 JULIE PYLE, TAMMY WILLET, VEGAS  
16 SHEPHERD RESCUE AND DOES I  
17 THROUGH X, INDIVIDUALS, AND ROE  
18 BUSINESS ENTITIES I THROUGH X,

19 Defendant(s).

20 **ASSOCIATION OF COUNSEL**

21 TO: ALL INTERESTED PARTIES; and

22 TO: ALL COUNSEL OF RECORD:

23 PLEASE TAKE NOTICE that SHANA D. WEIR, ESQ. of WEIR LAW GROUP, LLC,  
24 hereby associates the following counsel for Defendants, Julie Pyle, Tammy Willet and Vegas  
25 Shepherd Rescue in this action

26 Shana D. Weir, Esq.  
27 WEIR LAW GROUP, LLC  
28 6220 Stevenson Way  
Las Vegas, NV 89120

///

1 Please direct all service and correspondence in this action to both WEIR LAW GROUP,  
2 LLC and THE LAW OFFICES OF CASEY D. GISH.

3 Dated this 18<sup>th</sup> day of June, 2021.

4 **WEIR LAW GROUP, LLC**

6 /s/ Shana D. Weir  
7 SHANA D. WEIR, ESQ.  
8 Nevada Bar No. 9468  
9 6220 Stevenson Way  
10 Las Vegas, NV 89120  
11 (702) 509-4567 Telephone  
12 Co-counsel for Defendants Julie Pyle,  
13 Tammy Willet and Vegas Shepherd Rescue

14 **CERTIFICATE OF SERVICE**

15 I hereby certify that on this 18<sup>th</sup> day of June, 2020, I served a true and correct copy of the  
16 foregoing **NOTICE OF ASSOCIATION OF COUNSEL** by electronic service to all parties listed  
17 on the master service list pursuant to Administrative Order 14-2 and Rule 9 of the NEFCR.

18 /s/ Shana D. Weir  
19 An Employee of Weir Law Group



**OPPS**

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**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

ALLA ZORIKOVA;

Plaintiff(s),

vs.

JULIE PYLE, TAMMY WILLET, VEGAS  
SHEPHERD RESCUE AND DOES I  
THROUGH X, INDIVIDUALS, AND ROE  
BUSINESS ENTITIES I THROUGH X,

Defendant(s).

CASE NO. A-20-821249-C  
DEPT. NO. XX

Hearing Date: 7/7/2021  
Hearing Time: 9:00 a.m.

**DEFENDANTS' OPPOSITION TO PLAINTIFF'S EX PARTE APPLICATION FOR  
TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S DOGS  
AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S  
DECLARATION IN SUPPORT; OPPOSITION TO PLAINTIFF'S MOTION TO  
AMEND; AND DEFENDANTS' COUNTER-MOTION TO DISMISS PLAINTIFF'S  
COMPLAINT**

COME NOW, Defendants<sup>1</sup> Julie Pyle, Tammy Willet, and Vegas Shepherd Rescue, and provides their Opposition to *PLAINTIFF'S EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN SUPPORT*; OPPOSITION TO *PLAINTIFF'S MOTION TO AMEND COMPLAINT*; and *DEFENDANTS' COUNTER-MOTION TO DISMISS PLAINTIFF'S COMPLAINT*.

These Oppositions are based upon all matters of record herein, the Points and Authorities submitted herewith, the exhibits attached hereto, and upon such oral argument as the Court may allow at the time of the hearing of this matter.

## **MEMORANDUM OF POINTS AND AUTHORITIES**

### **I.**

#### **INTRODUCTION**

Plaintiff, Alla Zorikova, filed her Complaint against Defendants on September 15, 2020, alleging causes of action for: 1) theft under NRS 41.580, 2) civil conspiracy, 3) trespass, 4) fraud; 5) intentional infliction of emotional distress; and 6) property damage. The general basis of her complaint is that she owns 50 German Shepherds, of which she claims 25 were stolen from her on August 8 or 9, 2020 while she and her daughter, Olivia Jeong, were in jail in San Bernardino County, California for felony animal cruelty to those dogs. Plaintiff allegedly effectuated service of process on Defendants (which is the subject of the Counter-Motion to Dismiss) on October 6, 2020. Plaintiff filed the instant motion on October 24, 2020. The Motion was filed ex-parte and not served on Defendants. This case was stayed on December 4, 2020 after Defendants timely

---

<sup>1</sup> The Complaint on file herein does not name attorney Casey D. Gish as a Defendant. Plaintiff unilaterally modified the caption at some point to include him as a Defendant. Plaintiff's later inclusion of attorney Casey D. Gish should be stricken, and arguments for same are included in Defendants' Counter-Motion to Dismiss filed concurrently herein. However, should the court allow Plaintiff's modified caption to stand, Mr. Gish incorporates the arguments herein.



1 filed Demands for Security of Costs due to Plaintiff being a California resident outside this  
2 Court's Jurisdiction. Please see Exhibit 1, a copy of this Court's December 4, 2020 Order staying  
3 this case.

4 Defendant Vegas Shepherd Rescue is a Nevada non-profit rescue group dedicated to  
5 rescuing homeless, abandoned, and abused dogs. Defendants Tammy Willet and Julie Pyle are the  
6 President and Director of Vegas Shepherd Rescue.

7  
8 In the Complaint, Ms. Zorikova claims that 25 of her missing dogs were retrieved from  
9 Devore Animal Shelter on August 12, 2020 (*See* Complaint on file herein, pp. 3, #17). She also  
10 claims that the other 25 dogs are in the possession of Vegas Pet Rescue Project and/or Jamie  
11 Gregory (*See* Complaint on file herein, pp. 4, #21). Neither Vegas Pet Rescue Project nor Jamie  
12 Gregory are defendants in this action.<sup>2</sup> Later, she claims that 7 of the 25 German Shepherds are  
13 displayed on Vegas Shepherd Rescue's Facebook page (*See* Complaint on file herein, at pp. 4,  
14 #24).  
15

16 In support of her claim that Defendants herein stole her dogs, she attached photos which  
17 she alleges are screen shots of 5 dogs (Exhibits 4-8 are identified as Beacon, Berkley, Cypress,  
18 Lodi, and Malibu), from a Facebook page for Defendant. (*See* Ex Parte Motion, at attachments 4-  
19 8). It is unclear where the photo of the dog depicted in attachment 3 came from, or who that dog  
20 is, as the photo does not identify it as being from Vegas Shepherd Rescue's Facebook page. It is  
21 unclear whether the dog in attachment 9 is duplicative of other dogs or a different dog, as the  
22 name is not identified therein. She does not allege the age, sex, names, dates of birth, microchip  
23 information, or otherwise demonstrate any proof of ownership or suggest why she believes the  
24  
25  
26

27  
28 <sup>2</sup> Vegas Pet Rescue Project and Jamie Gregory have been sued in another action that has been dismissed by Judge Nancy Alf for Plaintiff's failure to post the required security bonds demanded by the Defendants in that case, including Defendant, Casey D. Gish (Case No. A-20-820761-C) – Please see attachment marked as Exhibit 2, a copy of the February 9, 2021 Order from Judge Alf dismissing Plaintiff's Complaint against Vegas Pet Rescue Project, et. al, for Plaintiff's failure to post the required security bonds.

1 dogs depicted in Exhibits 3-9 are hers. She has provided no photos of her own, the names she  
2 gave those dogs, identifying characteristics, their ages, sex, date of birth or microchip  
3 information. There is no discussion or evidence regarding the identity of the remainder of the 16  
4 dogs she alleges were stolen by Defendants, except there is also a reference to a dog called Baker  
5 in one paragraph of her Motion. *See* Motion, at pp. 6: 6-10. In sum, Plaintiff has provided no  
6 evidence of identity or ownership of the dogs in Exhibits 3-9 (which constitutes 5 identified  
7 dogs), plus Baker (number 6); and no evidence at all of the remaining 19 dogs.

9 The Motion itself seeks return of dogs referenced as Malibu, Baker, Beacon, Cypress,  
10 Lodi etc. (Attachment 2-9) and all others.” *See* Motion at pp. 6: 6-10. She also seeks a DNA test  
11 of all German Shepherds in Defendants’ custody between August 8 and September 9, 2020. *See*  
12 *id.* at 6: 11-13. She seeks all newborn puppies. *See id.* at 6: 14-15. She further seeks to prevent  
13 Defendants from selling, disposing, adopting, spaying, neutering Plaintiff’s German Shepherds;  
14 an order to allow Plaintiff to pick up the dogs. *See id.* at 6: 16-23.

16 Defendants are not in possession of dogs Plaintiff claims are hers because they have all  
17 been adopted out nearly a year ago and were spayed/neutered in compliance with Clark County  
18 criminal and civil ordinances.

## 20 **FACTUAL BACKGROUND**

### 21 **A. THE ARREST**

22 According to the California Secretary of State, Plaintiff owns and operates a protection  
23 dogs training business in Los Angeles, CA.<sup>3</sup> However, as Plaintiff indicates in her Motion, she  
24 actually houses upwards of 50 dogs in cages in the middle of the desert on vacant land,  
25 approximately 25 miles outside of Hinkley, CA. *See* Motion on file herein, at pp. 2, #13.  
26 According to property records, Plaintiff has owned this land since May 17, 2018,<sup>4</sup> and likely has  
27

28  
<sup>3</sup> A true and correct copy of the Secretary of State filing is attached hereto as Exhibit 3.

<sup>4</sup> A true and correct copy of the property deed is attached hereto as Exhibit 4.

1 been illegally conducting her business at this location since that time. Plaintiff likewise owns a  
2 similar business in the heart of the puppy mill capital of the United States, Missouri.<sup>5</sup> Clearly,  
3 Plaintiff is an established illegal operator of puppy mills throughout the United States, and her  
4 dogs are kept in inhumane and cruel conditions that she goes to great lengths to conceal from the  
5 purchasers of her dogs. Her website(s) portray her dogs as being bred and raised in luxurious  
6 surroundings in Los Angeles, when in fact they are raised in horrific, cruel, and inhumane  
7 conditions in the California desert outside of Barstow, California.

8 Plaintiff and her daughter were arrested for felony animal cruelty on August 8, 2020 when  
9 San Bernardino Sheriff deputies became aware of approximately 50+ dogs being housed on  
10 unimproved land in cages in the middle of the desert approximately 2 hours outside of Barstow, in  
11 the middle of the summer.<sup>6</sup> The location of the property wherein the dogs were found was  
12 extremely remote, approximately 24 miles into the middle of the desert, north of Hinkley,  
13 California (which is outside of Barstow), on completely vacant, and unimproved, desert land.  
14 There were no dirt roads, no running water, no housing structures, or electricity. There are no  
15 neighbors or towns for miles. The dogs did not have any permanent housing or shelter from the  
16 extreme elements of the blistering desert heat, food or water, which is a violation of California  
17 law and San Bernardino County code.

18 Pursuant to a public records request, and only after Plaintiff's arrest, Plaintiff attempted to  
19 inquire about and file for a kennel permit, which was unable to be granted to her because kennel  
20 permits are not allowed on vacant unimproved land.<sup>7</sup> San Bernardino issued her a violation  
21 notice on October 13, 2020 for operating a kennel without a permit. See *Id.* The photos depicted  
22 in those records show the condition of the property on August 8, 2020, when Plaintiff was  
23 arrested. See *Id.*

24 As shown in Exhibit 7, the property is totally vacant and unimproved with only a small  
25 makeshift shanty or shed that was filthy with garbage and raw rotting meat everywhere. The shed  
26 had no toilet, sink, shower or bed. Therefore, Plaintiff could not possibly not live there and likely  
27

28 <sup>5</sup> A true and correct copy of the Missouri Secretary of State filing is attached hereto as Exhibit 5.

<sup>6</sup> See arrest report attached to Plaintiff's moving papers.

<sup>7</sup> See response to public records request attached hereto as Exhibit 7.

1 leaves the dogs tied up and alone for long periods of time, without food, water or human  
2 interaction/companionship (which is illegal under California law and under San Bernardino  
3 ordinances). The dogs most were likely exposed to predatory animals due to inadequate fencing  
4 around the property and lack of shelter.

5 Ms. Zorikova and Ms. Jeong represent themselves to be breeders of “protection dogs”  
6 whose company is based out of Los Angeles; and whose dogs are trained to bite  
7 (<http://www.vonmarkgrafgermanshepherds.us>). Screen shots of the website are attached as  
8 Exhibit 6. Neither Ms. Zorikova, nor Ms. Jeong, and/or VonMarkGraf German Shepherds has a  
9 breeder license, which is a violation of the California Puppy Mill Ban under California Health and  
10 Safety Code Sec. 122354.5 and is also a prohibited deceptive and unfair business under the  
11 California Legal Remedies Act, Civil Code Sec. 1750 et seq. Furthermore, pursuant to San  
12 Bernardino County Code, it is illegal to have more than 5 dogs on the property without a breeder  
13 license or kennel permit. Ms. Zorikova’s property contained over 70 dogs.

14 Ms. Zorikova and Ms. Jeong remain under investigation for felony animal cruelty in  
15 California according to the San Bernardino County District Attorney’s Office.

#### 16 **B. THE ALLEGED “THEFT”**

17 Plaintiff claims that Defendants went on her property and stole her dogs at some point  
18 between August 8 and 10, 2020, while she was incarcerated on felony animal cruelty charges in  
19 San Bernardino County, California. However, Defendants have never, ever been on Plaintiff’s  
20 property, to steal her dogs or otherwise. *See* Declaration of Julie Pyle and Tammy Willet attached  
21 hereto as Exhibits 8 and 9. In fact, for the last 8 years, Defendant Tammy Willet has not lived in  
22 the State of Nevada. See Exhibit 9. She was not in the State of Nevada or the State of California  
23 in all of 2020. *Id.* Defendant Julie Pyle lives in the State of Nevada; however, she was not in the  
24 State of California at any point in August 2020. See Exhibit 8.

25 In support of Plaintiff’s motion, she attaches a document that appears to be a police record  
26 that references a vehicle that was reportedly seen near Plaintiff’s property on August 9 and/or 11,  
27  
28

2020, with the license plate AKC GSD. None of Defendants have ever owned a vehicle with that license plate.

Additionally, in Ms. Zorikova's motion, pp. 2, she alleges:

11. Deputy Parsons of Barstow Sheriff Station is now under criminal investigation by San Bernardino Sheriff's Internal Affairs for conspiracy with thieves, as she conducted Plaintiff's unwarranted false arrest on August 08 of 2020 and Parsons not while on duty allegedly called to Defendants on about August 09 of 2020 with statement that there are dogs on private property, that she had arrested/removed the owners and the dogs are available for pick up and sale.

At no time were Defendants contacted by San Bernardino County Sheriffs or government officials, including but not limited to Deputy Parsons, about removing and/or rescuing dogs from Plaintiff's property. *See* Exhibits 9 and 10. Defendants were not in any way, shape or form, associated with the San Bernardino County Government Officials' request for removal of dogs from Plaintiff's property. *Id.*

Plaintiff's claims are self-defeating, in that she acknowledges that law enforcement officials told people (who are not Defendants) to go on the property and remove dogs. This directive by California government officials is the subject of multiple lawsuits by Ms. Zorikova against the Sheriff's department in San Bernardino County and San Diego County, California, a portion of which recently settled to Ms. Zorikova for \$10,000. Plaintiff has also sued various people in multiple counties in California, including rescue groups there, for the alleged theft and return of her 25 dogs.

### C. Vegas Shepherd Rescue

As a rescue group, Vegas Shepherd Rescue's singular purpose is to take in lost, found, abused, abandoned, and/or surrendered dogs – primarily German Shepherd Dogs as the name implies; obtain necessary medical attention, including spay and neuter as required by Nevada/Clark County law, and adopt them out. *Id.* Vegas Shepherd Rescue also takes shepherds in from kill shelters and adopts them out. *Id.* Vegas Shepherd Rescue rescues and places upwards

1 of a hundred dogs a year, approximately 85% of which are German Shepherd Dogs. *Id.* Vegas  
2 Shepherd Rescue has performed this service as a non-profit corporation that exists entirely on  
3 donations since its inception in 2012.<sup>8</sup> When Defendants come into possession of any dog, they  
4 immediately check to see if there is a microchip. *Id.* When they obtain veterinary care, which they  
5 do for each dog that comes into their possession, the veterinarian also checks to see if there is a  
6 microchip. *Id.*

8 Plaintiff alleges her dogs are all microchipped. (*See* Complaint, pp. 4, #20). Defendants  
9 are not, and have never been in possession of any dogs that have a microchip registered to Ms.  
10 Zorikova, Ms. Jeong and/or Von Mark Graf German Shepherds. *Id.* Because Plaintiff has alleged  
11 that “thieves remove microchips;” and for brevity’s sake, Defendants have never removed or  
12 directed the removal of a dog’s microchip. *Id.* Defendant’s veterinarians have likewise never  
13 removed a microchip (and Defendants are unsure if that is even legal for veterinarians to do so).  
14 *Id.*

16 It appears that Plaintiff simply stumbled upon a German Shepherd rescue group’s  
17 Facebook and decided, without proof, to claim various dogs as hers. She actually has no idea what  
18 dogs are hers. Puppy mills are like that. Take the case of Beacon, for example (Plaintiff’s Exhibit  
19 4). Defendants came into possession of Beacon, on July 8, 2020, a full month before Plaintiff was  
20 arrested and a full month before any of the facts that are the subject of Plaintiff’s claims. Beacon  
21 was found by a trucker running alongside the highway. The trucker brought Beacon to  
22 Defendants. Beacon had been shot in the face and required extensive medical care before being  
23 adopted. Beacon was not microchipped.

26 After Plaintiff and her daughter were arrested for felony animal cruelty by San Bernardino  
27 County Sheriff deputies, Plaintiff filed a police report for theft against various people, including  
28

---

<sup>8</sup> Counsel for Defendants are performing their services entirely on a pro bono basis in multiple lawsuits in Nevada and California.

1 Julie Pyle. In response, San Bernardino County Sheriff's deputies visited Ms. Pyle at her Las  
2 Vegas home in early September 2020. There, the deputies and Ms. Pyle talked for 40 minutes.  
3 The Sheriff determined Ms. Pyle was not in possession of any of Plaintiff's German Shepherds.  
4 The Sheriff did not find any reason to enter the residence of Ms. Pyle.

5 As a practical matter Baker, Berkley, Cypress, Lodi, and Malibu were adopted in August  
6 and September of 2020, with the last dog being adopted on or about September 15, 2020, weeks  
7 before Plaintiff served her Complaint on Defendants, and more than a month before the instant  
8 motion was filed (that was not served). As such, there was never any status quo to preserve vis-à-  
9 vis an injunction.

## 12 II. LEGAL ARGUMENT

### 13 A. Standard of Review

14 The Supreme Court has stated that courts must consider the following elements in  
15 determining whether to issue a temporary restraining order and preliminary injunction: (1) a  
16 likelihood of success on the merits; (2) likelihood of irreparable injury if preliminary relief is not  
17 granted; (3) balance of hardships; and (4) advancement of the public interest. Winter v. N.R.D.C.,  
18 555 U.S. 7, 20 (2008). The test is conjunctive, meaning the party seeking the injunction must  
19 satisfy each element. Backman v. Goggin, No. 2:16-CV-1108 JCM-PAL (D. Nevada 2016).

20 Additionally, post-Winter, the Ninth Circuit has maintained its serious question and  
21 sliding scale test. See Alliance for the Wild Rockies v. Cottrell, 632 F.3d 1127 (9th Cir. 2011).  
22 Under this approach, the elements of the preliminary injunction test are balanced, so that a  
23 stronger showing of one element may offset a weaker showing of another. Id. at 1131. Serious  
24 questions going to the merits and a balance of hardships that tips sharply towards the plaintiff can  
25 support issuance of a preliminary injunction, so long as the plaintiff also shows that there is a  
26 likelihood of irreparable injury and that the injunction is in the public interest. Id. at 1135.

27 The Nevada Supreme Court has recently stated that "[a] preliminary injunction to  
28 preserve the status quo is normally available upon a showing that the party seeking it  
enjoys a reasonable probability of success on the merits and that the defendant's  
conduct, if allowed to continue, will result in irreparable harm for which

compensatory damage is an inadequate remedy. Swarovski Ventures, Ltd. v. JGB Vegas Retail Lessee, LLC, No. 71618, (2018) (citing Dixon v. Thatcher, 103 Nev. 414, 415, 742 P.2d 1029, 1029 (1987)). The party seeking injunctive relief carries the burden of proving that there exists a reasonable probability of irreparable harm for which compensatory damages would not provide adequate remedy. S.O.C., Inc. v. Mirage Casino-Hotel, 117 Nev. 403, 408, 23 P.3d 243, 246 (2001) (Emphasis added.)

First, Plaintiff has provided no facts and no evidence that show she is entitled to an injunction because compensatory damages are an adequate remedy. Plaintiff has identified the amount of money she believes she is entitled to be compensated – namely, \$1,150,000 for 25 dogs. See Complaint, at pp 4, #18).

Plaintiff admittedly breeds dogs (without appropriate licenses) and sells them, so she is ultimately looking to make money off of them, not keep them as pets. That's why she keeps them in the middle of the desert in inhumane and cruel conditions without adequate shelter, and without even food and water.

As a practical matter, because Defendants adopted out the last dog Plaintiff claims ownership of weeks before being served with the Complaint, and approximately a month and half before Plaintiff ever filed her unserved motion for restraining order, Defendants cannot turn over dogs to Plaintiff.

As discussed above, Plaintiff is mistaken as to which dogs are hers and is globbing onto anyone and everyone for the same 25 dogs in multiple lawsuits. It's an honest mistake from the owner of a puppy mill because they simply cannot keep track of all of the dogs they breed and sell. Unfortunately for Plaintiff, none of the dogs in question had any microchips associated with Plaintiff, her daughter, or Von Mark Graf German Shepherds.

**B. Plaintiff's Motion Should Be Denied Because She Has Not Alleged Facts Or Circumstances By Which She Can Succeed On The Merits**

Plaintiff provides a single sentence in her motion regarding probability of success on the merits: "34. Plaintiff is likely to succeed on the merits of the case." See Motion at pp. 4. This utterly fails to meet Plaintiff's burden (which her moving papers acknowledge she has) of showing how she will succeed on the merits. It provides no law and no facts regarding the same and her motion should be denied on this basis.



1                   **a.     Plaintiff Cannot Succeed on the Merits Against Ms. Willet or Ms. Pyle**  
2                   **Because They Were Acting Within the Course And Scope of Their**  
3                   **Employment**

4                   Plaintiff will not succeed against Ms. Willet or Ms. Pyle individually because Plaintiff  
5 cannot maintain an action against them in addition to Vegas Shepherd Rescue. NRS 41.745  
6 provides employer liability for employees' acts when they are acting within the course and scope  
7 of employment. Plaintiff alleges in paragraph 7 of her Complaint, "All of the acts and/or failures  
8 to act were within the scope of any agency or employment. . . ." (See Complaint at pp. 2).

9                   **b.     Plaintiff Cannot Succeed On the Merits of Her Theft Claim under**  
10                   **NRS 41.580**

11                   NRS 41.580 states:

12                   Action by owner of property; treble damages. If property has been taken from its  
13 owner by larceny, robbery, burglary, embezzlement, theft or any other offense that is  
14 a crime against property and another person buys, receives, possesses or withholds  
15 the property under circumstances that make such conduct a violation of subsection 1  
16 of NRS 205.275, the owner of the property may bring a civil action against the person  
17 who bought, received, possessed or withheld the property and may recover treble the  
18 amount of any damage the owner has suffered, together with the owner's costs in the  
19 action and a reasonable attorney's fee.

20                   Plaintiff's viable claims, if any, are likely against the Sheriff's department or other San  
21 Bernardino officials for directing people or rescue groups (who were not Defendants) to remove  
22 suffering animals from her illegal and unpermitted puppy mill. The County has paid Ms.  
23 Zorikova at least \$10,000, and litigation is ongoing. Plaintiff has also sued other people and  
24 rescue groups in California and Nevada in multiple lawsuits relative to this matter.

25                   Plaintiff likewise cannot succeed on the merits as to her theft claim because Defendants  
26 were never on Plaintiff's property or even in the State of California at the time Plaintiff's dogs  
27 were allegedly stolen. Plaintiff has brought no evidence of this claim, other than to allege it is a  
28 fact. Defendants were never asked by any San Bernardino government officials to remove the  
dogs. Defendants have never possessed any animals with microchips that belong to Ms. Zorikova,  
Ms. Jeong and/or Von Mark Graf German Shepherds. It is undisputed that Defendants never

1 entered Plaintiff's property. It is also undisputed that Defendants never even entered the State of  
2 California anywhere near the timeframe that is the subject of Plaintiff's Complaint.

3 Plaintiff has provided no facts or evidence to show that any of the dogs observed on Vegas  
4 Shepherd Rescue's Facebook are her dogs. Nevertheless, the dogs she claims are hers were all  
5 adopted weeks before Plaintiff served her Complaint and Defendants were under no order or  
6 requirement to do anything different with those dogs than what they do with every other dog that  
7 comes to them: adopt them out.

8 **c. Plaintiff Cannot Succeed On The Merits On Her Conspiracy Claim**

9 Plaintiff alleges Defendants conspired among themselves to steal her dogs. *See* Complaint  
10 at pp. 6, #38. Agents and employees of a corporation cannot conspire with their corporate  
11 principal or employer where they act in their official capacities on behalf of the corporation and  
12 not as individuals for their individual advantage. *Collins v. Union Federal Savings and Loan*  
13 *Association*, 662 P.2d 610, 615 (1983) (quoting *Wise v. Southern Pacific Company, et al*, 35 Cal.  
14 *Rptr* 652, 655 (1963)). As the Defendants are the President and Director of Vegas Shepherd  
15 Rescue, they cannot conspire amongst themselves and this claim fails as a matter of law.  
16 Notwithstanding the above, Defendants were not involved in the "rescue" or the alleged "theft" of  
17 Plaintiff's dogs. Vegas Shepherd Rescue cannot conspire alone.

18 **d. Plaintiff's Claim for Trespass Enjoys No Success On the Merits**  
19 **Because Defendants Have Never Been On Plaintiff's Property**

20 Plaintiff alleges Defendants entered her property while she was incarcerated for animal  
21 cruelty, to steal her dogs. Plaintiff alleges these actions constitute trespass. Plaintiff alleges no  
22 damages resulting from alleged trespass in her Complaint, and therefore, it cannot succeed on the  
23 merits.  
24

25 Notwithstanding the above, as discussed herein, Defendants have never been to Plaintiff's  
26 property. Defendants were not even in the entire State at the time Plaintiff alleges they trespassed.  
27 Plaintiff has no evidence to the contrary. As a result, Plaintiff enjoys no success on the merits.  
28

**e. Plaintiff's Claim for Property Damage Enjoys No Success on the Merits Because Dogs in Clark County Must Be Spayed and Neutered**

Plaintiff's Complaint alleges that the spaying and neutering of dogs reduces their value, and constitutes property damage. *See* Complaint at pp. 9, #59. Her Motion seeks that dogs she identified as her property not be spayed or neutered.

In Clark County, it is the law that all dogs must be spayed or neutered (see Clark County Ordinance 7.14, North Las Vegas Ordinance 6.04, Municipal Ordinance 10.08 and Henderson Ordinance 7.04). Failure to do so constitutes a criminal and civil violation of law. Because Defendants cannot break the law by failing to spay and neuter dogs in their possession, Plaintiff enjoys no success on the merits.

Notwithstanding the above, Plaintiff had no breeder license at the time that would have allowed her to have intact dogs either.

**f. Even assuming all of Plaintiff's allegations against Defendants are true, which they are not, Plaintiff would be precluded as a matter of law from recovering against Defendants based upon her undisputed "dirty hands" due to her illegal operation of a cruel and inhumane puppy mill on unimproved land in the desert in California and based upon her deceptive business practices which mislead and defraud members of the public and therefore she has no probability of success on the merits.**

Even if this Court accepts all of Plaintiff's allegations as true, the undisputed facts of this matter conclusively prove that Plaintiff has been operating an illegal puppy mill in San Bernardino County, California in violation of San Bernardino County ordinances. Her "house of horrors" was investigated by San Bernardino County authorities and she was cited for her failure to have proper structures on her land adequate to meet the basic minimum requirements that kennel/breeding facilities must comply with in San Bernardino County. Please see attached Exhibit 10, which is a citation issued by San Bernardino County against Plaintiff for her failure to maintain her "kennel" in accordance with the requirements of San Bernardino County law. Also

1 included are pictures of the unimproved property taken by San Bernardino County investigators  
2 showing the atrocious conditions Plaintiff keeps her dogs in year-round. Of course, Plaintiff does  
3 not show such pictures in her own advertising materials on her website. She only shows false and  
4 fake images of dogs in lush green conditions at beautiful homes in Los Angeles which she falsely  
5 portrays as the location of where her dogs are bred, raised, and trained to bite. This is a lie and it  
6 is fraudulent.  
7

8 In addition, it is undisputed that Plaintiff has been arrested for and is currently under  
9 investigation for felony animal cruelty for keeping dogs hidden in the desert on vacant land  
10 without food, water, shelter and their most basic needs. Plaintiff also defrauds members of the  
11 public by making false representations that her dogs are bred in luxurious conditions in Los  
12 Angeles, California. She provides pictures on her website of beautiful German Shepherd Dogs in  
13 clean and healthy conditions. These images are actually stock images taken by her from other  
14 sites on the internet. If she provided members of the public with pictures of the true conditions in  
15 which her dogs are raised, no sane person would purchase one of these dogs. Plaintiff and her  
16 daughter, Ms. Jeong, represent themselves to be breeders of “protection dogs” whose company is  
17 based out of Los Angeles; and whose dogs are trained to bite  
18 (<http://www.vonmarkgrafgermanshepherds.us>). Screen shots of the website are attached hereto as  
19 Exhibit 6. Neither Plaintiff, nor Ms. Jeong, nor VonMarkGraf German Shepherds has a breeder  
20 license, which is a violation of the California Puppy Mill Ban under California Health and Safety  
21 Code Sec. 122354.5 and is also a prohibited deceptive and unfair business under the California  
22 Legal Remedies Act, Civil Code Sec. 1750 et seq. Furthermore, pursuant to San Bernardino  
23 County Code, it is illegal to have more than 5 dogs on the property without a breeder license or  
24 kennel permit. Ms. Zorikova’s property contained over 70 dogs. Her deceptive business  
25  
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1 practices, horrific animal abuse, and fraud against the public all constitute illegal activities by  
2 Plaintiff that preclude her from recovery under the doctrine of “unclean or dirty hands”.

3 In determining whether a plaintiff is precluded from recovering against a defendant based  
4 upon the plaintiff’s unclean hands, the Nevada Supreme Court has established a two-factor  
5 analysis: (1) the egregiousness of the misconduct at issue, and (2) the seriousness of the harm  
6 caused by the misconduct. See *Income Investors*, 101 P.2d at 974; cf. *Evans*, 116 Nev. at 610, 5  
7 P.3d at 1050-51; *Banks*, 120 Nev. at 843, 102 P.3d at 66. When these factors weigh against  
8 granting the requested relief, the unclean hands doctrine will bar Plaintiff from recovering. See  
9 *Evans*, 116 Nev. at 610, 5 P.3d at 1050-51; *Banks*, 120 Nev. at 843, 102 P.3d at 66; *Income*  
10 *Investors*, 101 P.2d at 974; see also *Smith v. Smith*, 68 Nev. 10, 24, 226 P.2d 279, 286 (1951)  
11 (recognizing that “the un-clean hands maxim is one founded on public policy”). The district court  
12 has broad discretion in applying these factors, and will not be overturned unless it is unsupported  
13 by substantial evidence. *Las Vegas Fetish and Fantasy Ball v. Ahern Rentals*, 124 Nev. 272, 276,  
14 182 P.3d 764 (2008). See also *See University Sys. v. Nevadans for Sound Gov’t*, 120 Nev. 712,  
15 721, 100 P.3d 179, 187 (2004) (recognizing the district court’s discretion in granting equitable  
16 injunctive relief).  
17

18 Based upon the forgoing, it is clear that Plaintiff would be precluded from recovering  
19 against Defendants due to her “dirty hands” based upon her continuous and illegal activities in  
20 operating an unlicensed puppy mill on unimproved land in the remote California desert and based  
21 upon her ongoing concealment from the public of the true cruel and inhumane conditions in  
22 which these dogs are bred in and raised in. Therefore, as a matter of law, Plaintiff cannot meet  
23 her burden of showing the probability of success on the merits.  
24

25  
26  
27  
28 **g. Plaintiff’s Claim for Fraud Enjoys No Success on the Merits because  
based upon the Undisputed Facts of this Case, Plaintiff Cannot Meet  
all the Elements of a Claim for Fraud as a Matter of Law**

NRCP 9 creates special rules governing the pleading of specified matters, including fraud. Plaintiff's first cause of action in her Complaint is based upon alleged fraud. When these specified matters are material to a pleading, the party must assert in some detail the factual basis of the matter. *See Ivory Ranch, Inc. v. Quinn River Ranch, Inc.*, 101 Nev. 471, 705 P.2d 673 (1985). An allegation of fraud must provide the circumstances with particularity and must include the time, place, and identity of the parties and the nature of the fraud. *Rocker v. KPMG LLP*, 122 Nev. 1185, 148 P.3d 703,704 (2006), *abrogated on other grounds by Buzz Stew, LLC v. City of N. Las Vegas*, 124 Nev. 224, 181 P.3d 670 (2008). Because Plaintiff's Complaint fails to specify the time, place, and identities and the nature of the fraud, it is obvious she will not be able to recover against Defendants for alleged fraud. In fact, Plaintiff puts forth no evidence that Defendants and Plaintiff have ever had an interaction or any type of conversation, communication, or discussion whatsoever. She alleges no communication whatsoever between herself and any of the defendants, and no such communications have ever taken place. Therefore, Plaintiff cannot recover on her claim for fraud as a matter of law, and therefore her Motion should be denied.

**h. Plaintiff's Claim for Intentional Infliction of Emotional Distress Enjoys No Success on the Merits because the facts alleged by Plaintiff, even if the Court assumes they are true, cannot support a claim for IIED as a matter of law because all the elements of such a claim cannot possibly be met by Plaintiff.**

For a plaintiff in Nevada to succeed on a claim for intentional infliction of emotional distress, the plaintiff must show three things: (1) the defendant engaged in extreme and outrageous conduct with either the intention of, or reckless disregard for, causing emotional distress, (2) the plaintiff suffered severe or extreme emotional distress, and (3) actual or proximate causation. *Dillard Dept. Stores, Inc. v. Beckwith*, 115 Nev. 372, 378 (1999) (Citing *Star v. Rabello*, 97 Nev. 124, 125 (1981)). The Nevada Supreme Court defines

1 extreme and outrageous conduct as "that which is outside all possible bounds of decency and is  
2 regarded as utterly intolerable in a civilized society." *Maduik v. Agency Rent-A-Car*, 114 Nev. 1,  
3 4 (1998) (internal quotations omitted). *Shoen v. Amerco, Inc.*, 111 Nev. 735, 747 (1995).

4  
5 The Defendants in this matter rescue abused and homeless and neglected dogs. That is  
6 undisputed. It is also undisputed that many German Shepherd Dogs come into the possession of  
7 Defendants, as part of their volunteer efforts to save dogs that have been abused and neglected. If  
8 Defendants came into the possession of any of Plaintiff's dogs, the purpose would have been to  
9 save the dogs lives and provide them with food, shelter, medical treatment, and find them homes.  
10 Plaintiff on the other hand runs an illegal puppy mill and keeps dogs in horrific, cruel, filthy, and  
11 inhumane conditions. If anyone has engaged in extreme and outrageous conduct, it is the  
12 Plaintiff. Because the facts alleged by Plaintiff clearly demonstrate that she has no chance of  
13 proving Defendants engaged in extreme and outrageous conduct, she has no likelihood of success  
14 on the merits and her Motion should be denied.  
15  
16

17  
18 C. **There is No Irreparable Injury Because Plaintiff Has Already Established**  
19 **Her Claimed Value of the Property and the Purpose of the Dogs is to Sell**  
20 **Them for Profit**

21 In her motion, Plaintiff merely states that she will suffer an irreparable injury if her motion  
22 is not granted, without any marshalling of the facts and circumstances that support her claim; and  
23 for that reason, her motion should be denied.

24 As discussed above, Plaintiff breeds her bite dogs for sale and will ship them anywhere.  
25 These are not her pets and she clearly does not think much of them since she keeps them in cruel  
26 and inhumane conditions in the hot desert summer and cold desert winter without so much as  
27 regular food, water or shelter. She does this for a profit, without the proper licensing, and with  
28 much suffering to the dogs. She operates an illegal puppy mill. Indeed, Plaintiff has already

1 provided what she believes is the value of the allegedly 25 stolen dogs: \$1,150,000. Therefore, if  
2 Plaintiff's claims are proven, money damages are appropriate to compensate Plaintiff. She'll just  
3 buy and breed more until she is no longer allowed.

4 **D. The Balance of Hardships Tips in Favor of Defendants Because An**  
5 **Injunction Would Be Impossible for Defendants to Accomplish, Given They**  
6 **Were Adopted Nearly a Year Ago**

7 Again, Plaintiff makes a single statement that the balance of hardships is in her favor,  
8 without any discussion as to why. *See* Motion, at pp. 4, #32. As a result, her motion should be  
9 denied.

10 More importantly, Defendants suffer the hardship in this scenario. They cannot effectuate  
11 the return dogs that have been adopted to subsequent purchasers for value. "A subsequent  
12 purchaser is bona fide under common-law principles if it takes the property 'for a valuable  
13 consideration and without notice of the prior equity, and without notice of facts which upon  
14 diligent inquiry would be indicated and from which notice would be imputed to him, if he failed  
15 to make such inquiry.' (*Shadow Woods Homeowners Association v. New York Community*  
16 *Bancorp*, 366 P3d. 1105 (2016) quoting *Bailey v. Butner*, 64 Nev. 1, 19, 176 P.2d 226, 234 (1947)  
17 (emphasis omitted); *see also Moore v. DeBernardi*, 47 Nev. 33, 54, 220 P. 544, 547 (1923) ('The  
18 decisions are uniform that the bona fide purchaser of a legal title is not affected by any latent  
19 equity founded either on a trust, [e]ncumbrance, or otherwise, of which he has no notice, actual or  
20 constructive.')"

21 Here, the last dog Plaintiff claims were hers was adopted on or before Plaintiff even filed  
22 her lawsuit, let alone served the same. Defendant adopted the dogs in good faith as they do with  
23 all of the 100 or so dogs that come into their possession each year. It will be impossible for  
24 Plaintiff to claw back dogs who have been purchased by families for money (who will not be  
25 leaving them in the middle of the desert without food, water, or shelter).

26 Defendants likewise cannot obtain DNA testing from dogs already adopted. Who would  
27 even pay for the cost of the same? Defendant is a non-profit entity that exists entirely on  
28 donations. Counsel for Defendants are providing their services pro bono in multiple lawsuits.



1 Plaintiff has an interest in protecting her unlicensed and unpermitted puppy mill business  
2 but she does not have an actual interest in these particular dogs. As a result, monetary damages, if  
3 proven, are sufficient.

4 **E. Public Interest Favors Plaintiff Never Possessing Dogs Again**

5 Plaintiff is currently under investigation for felony animal cruelty for keeping dogs hidden  
6 in the desert on vacant land without food, water, shelter and their most basic needs. It seems clear  
7 that the public interest would favor dogs not living in inhumane and illegal conditions. As a  
8 result, monetary damages, if proven, are sufficient.

9 Defendants, on the other hand, are a nonprofit animal rescue group that helps at least 100  
10 dogs a year with medical care, treatment, rehabilitation and finally, adoption. Plaintiff makes a  
11 living out of deceiving the public and fraudulently selling dogs under false pretenses. People like  
12 Defendants often spend their own money when donations come up short.

13 **F. If an Injunction Should Be Issued, Plaintiff Should Be Required to Post Bond**  
14 **in the Amount of the Damages, Multiplied by the Expected Time Until Trial**

15 As discussed above, Defendants have no way of giving any dogs that have been adopted  
16 to Plaintiff, let alone within the 3 days sought by Plaintiff. Defendants are not in possession of the  
17 dogs and believe that clawing dogs back is illegal because the new owners are subsequent  
18 purchasers for value (discussed above). Further, Defendants do not have resources to pay for  
19 DNA testing.  
20

21 However, should this Court issue an injunction, NRCP (65c) provides that the court may  
22 issue a preliminary injunction or a temporary restraining order only if the movant gives security in  
23 an amount that the court considers proper to pay the costs and damages sustained by any party  
24 found to have been wrongfully enjoined or restrained. The State, its officers, and its agencies are  
25 not required to give security.  
26

27 Here, Defendants are having to defend Plaintiff's baseless and vexatious lawsuits, where  
28 Plaintiff has produced ZERO proof of ownership of dogs she claimed Defendants once had in

1 their possession. Plaintiff alleges that the dogs are worth \$1,150,000; and Defendants request that  
2 be the amount of Plaintiff's bond (plus the expected time for resolution of Plaintiff's Complaint).  
3 This amount will make Defendants whole in the event Plaintiff's claims fail.

4 The Court is authorized under NRS 18.130(2) to order an increased security of costs bond  
5 on out of state Plaintiffs if the Court finds that the statutory minimum of \$500 is insufficient.  
6 Defendants request that based upon the number of motions pending from Plaintiff, the Plaintiff's  
7 repeated disregard for the Court's procedural rules, and the sheer volume of correspondence and  
8 discovery directed at Defendants' counsel constantly from Plaintiff, and the fact that counsel for  
9 Defendants are performing their work pro bono for Defendants, it is requested that the court  
10 increase the amount of the cost bonds to \$5,000 per Defendant.

11  
12  
13 **G. Opposition to Plaintiff's Motion to Amend.**

14 Plaintiff is seeking to amend her Complaint in this matter to add additional defendants,  
15 including Jamie Gregory, Vegas Pet Rescue Project, and attorney Casey D. Gish. A bit of  
16 procedural back ground may be instructive for the Court on this issue.

17 The instant matter is Case No. A821249 - Zorikova vs. Vegas Shepherd Rescue, Tammy  
18 Willet, and Julie Pyle. The Complaint was filed on 9/15/2020. An application to proceed in  
19 forma pauperis was filed by Zorikova on 9/20/2020. The application was denied on  
20 9/20/2020. A subsequent application to proceed in forma pauperis was filed on 9/24/2020. Also  
21 on 9/24/2020, it appears an amended complaint was filed. On 9/25/2020 the application to  
22 proceed in forma pauperis was granted. The summons in the case were issued on 10/2/2020. On  
23 10/6/2020 the court clerk issued a notice of non-conforming documents. Plaintiff allegedly  
24 "served" her Complaint at Vegas Shepherd Rescue's business address on 10/6/2020. A responsive  
25 pleading was due 10/26. On 10/26/2020, Demands for Security of Costs, due to Plaintiff being an  
26 out-of-state resident of California were filed on behalf of each Defendant. Defendant had 30 days  
27  
28

1 in which to post the security bonds under. On December 4, 2021, this Court issued an order  
2 staying this action until Plaintiff posted the required bond. Please see Exhibit 1 hereto. She failed  
3 to post the required bond until April 11, 2021. She failed to provide counsel with the required  
4 notice of posting of the bonds.

5 Case No. A820761 - Zorikova vs. Vegas Pet Rescue Project, Casey Gish, Jamie Gregory,  
6 Shannon Weeks, and Erica Weeks. The Complaint was filed on 9/6/2020. The court clerk issued  
7 a notice of non-conforming documents on 9/9/2020. The case was assigned to Judge Nancy Alf.  
8 An application to proceed in forma pauperis was filed by Zorikova on 9/24/2020. The application  
9 was granted the same day on 9/24/2020. Also, on 9/24/2020, it appears an amended complaint  
10 was filed. The summons in the case was issued on 10/2/2020. However, neither the summons,  
11 the Complaint, nor the Amended Complaint were ever served on any of the Defendants. On  
12 10/22/2020 Defendants and each of them filed Demands for Security of Costs from Plaintiff due  
13 to her out of state residency in California. Plaintiff had 30 days to post the required bonds. She  
14 never did. On 2/29/2021, Judge Alf issued an order dismissing Plaintiff's Complaint in that  
15 matter due to the failure to post the required security bonds. Please see Exhibit 2 attached hereto.

16 Plaintiff now seeks to amend her complaint by adding the dismissed defendants from the  
17 Zorikova v. Vegas Pet Rescue Project case (A820761). This constitutes improper "forum-  
18 shopping". Forum shopping is "[t]he practice of choosing the most favorable jurisdiction or court  
19 in which a claim might be heard." *Black's Law Dictionary* 681 (8th ed. 2004). Plaintiff's case  
20 was dismissed by Judge Alf. If she wants to resurrect that claim, she needs to take the appropriate  
21 procedural steps. Attempting to add parties that were previously dismissed in another lawsuit is  
22 procedurally improper. Plaintiff's Motion to Amend should be denied.

23  
24  
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28 ///

IV.

CONCLUSION

Based upon the foregoing, Defendants respectfully request that this Court deny Plaintiff's Motion for Restraining Order.

**COUNTER-MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

**MEMORANDUM OF POINTS AND AUTHORITIES**

I.

FACTUAL AND PROCEDURAL HISTORY

Defendants hereby incorporate by reference, as if fully set forth herein, the factual and procedural history stated in their Opposition to Plaintiff's Ex Parte Motion above, including the exhibits thereto.

II.

LEGAL ARGUMENT

A. Standard of Review

A Motion to Dismiss pursuant to NRCP 12(b)(5), failure to state a claim, the Court shall accept the allegations of the Complaint as true and draw all inferences in favor of the non-moving party. *Buzz Stew, LLC v. City of N. Las Vegas*, 124 Nev. 224, 228, 181 P.3d 670, 672 (2008). Dismissal is proper where the allegations are insufficient to establish the elements of a claim for relief. *Stockmeier v. Nevada Department of Corrections*, 124 Nev. 313, 316, 183 P.3d 133, 135 (2008).

B. Improper Service of Process

Plaintiff herself served a copy of the summons and complaint on 10/2/2020 at the mailing address of Defendant Vegas Shepherd Rescue. NRCP 4(c)(3) requires that a person, that is not a party to the action, must serve the summons and complaint. Defendant Vegas Shepherd Rescue has surveillance video of Plaintiff personally serving the documents herself. This constitutes invalid service of process and requires dismissal of the case pursuant to NRCP 12(b)(4). In addition, Plaintiff has sued Defendants Willet and Pyle personally. However, she failed to serve

1 them personally or at their residences as required by NRCP 4(2)(a). Again, this is improper  
2 service requiring the dismissal of Plaintiff's Complaint pursuant to NRCP 12(b)(4).

3 **C. Defendants Willet and Pyle have only acted within the course and scope of**  
4 **their responsibilities as members and officers of Vegas Shepherd Rescue and**  
5 **the claims against them should be dismissed.**

6 NRS 41.745 provides employer liability for employees' acts when they are acting within  
7 the course and scope of employment. Plaintiff alleges in paragraph 7 of her Complaint, "All of the  
8 acts and/or failures to act were within the scope of any agency or employment. . . ." (See  
9 Complaint at pp. 2). Therefore, Plaintiff's claims against Willet and Pyle fail as a matter of law  
10 pursuant to NRCP 12(b)(5).

11 **D. Plaintiff's Cause of Action No. 1 for Theft**

12 Plaintiff's claim for Theft fails as a matter of law due to Plaintiff's failure to state a claim  
13 upon which relief can be granted. Even assuming the facts asserted by Plaintiff are true, they  
14 cannot satisfy the elements of her claim

15 NRS 41.580 states:

16  
17 Action by owner of property; treble damages. If property has been taken from its  
18 owner by larceny, robbery, burglary, embezzlement, theft or any other offense that is  
19 a crime against property and another person buys, receives, possesses or withholds  
20 the property under circumstances that make such conduct a violation of subsection 1  
21 of NRS 205.275, the owner of the property may bring a civil action against the person  
22 who bought, received, possessed or withheld the property and may recover treble the  
23 amount of any damage the owner has suffered, together with the owner's costs in the  
24 action and a reasonable attorney's fee.

25 Plaintiff's viable claims, if any, are likely against the Sheriff's department or other San  
26 Bernardino officials for directing people or rescue groups (who were not Defendants) to remove  
27 suffering animals from her illegal and unpermitted puppy mill. The County has paid Ms.  
28 Zorikova at least \$10,000, and litigation is ongoing. Plaintiff has also sued other people and  
rescue groups in California and Nevada in multiple lawsuits relative to this matter.

1 Plaintiff likewise cannot succeed on the merits as to her theft claim because Defendants  
2 were never on Plaintiff's property or even in the State of California at the time Plaintiff's dogs  
3 were allegedly stolen. Defendants were never asked by any San Bernardino government officials  
4 to remove the dogs. Defendants have never possessed any animals with microchips that belong to  
5 Ms. Zorikova, Ms. Jeong and/or Von Mark Graf German Shepherds. It is undisputed that  
6 Defendants never entered Plaintiff's property. It is also undisputed that Defendants never even  
7 entered the State of California anywhere near the timeframe that is the subject of Plaintiff's  
8 Complaint.  
9

10 Plaintiff has provided no facts or evidence to show that any of the dogs observed on Vegas  
11 Shepherd Rescue's Facebook are her dogs. Nevertheless, the dogs she claims are hers were all  
12 adopted weeks before Plaintiff served her Complaint and Defendants were under no order or  
13 requirement to do anything different with those dogs than what they do with every other dog that  
14 comes to them: adopt them out. Plaintiff cannot recover as a matter of law on her theft cause of  
15 action and that claim should be dismissed pursuant to NRCP 12(b)(5).  
16  
17

18 **E. Plaintiff's Cause of Action No. 2 for Civil Conspiracy**

19 Plaintiff alleges Defendants conspired among themselves to steal her dogs. *See* Complaint  
20 at pp. 6, #38. Agents and employees of a corporation cannot conspire with their corporate  
21 principal or employer where they act in their official capacities on behalf of the corporation and  
22 not as individuals for their individual advantage. *Collins v. Union Federal Savings and Loan*  
23 *Association*, 662 P.2d 610, 615 (1983) (quoting *Wise v. Southern Pacific Company, et al*, 35 Cal.  
24 Rptr 652, 655 (1963)). As the Defendants are the President and Director of Vegas Shepherd  
25 Rescue, they cannot conspire amongst themselves and this claim fails as a matter of law.  
26 Notwithstanding the above, Defendants were not involved in the "rescue" or the alleged "theft" of  
27 Plaintiff's dogs. Vegas Shepherd Rescue cannot conspire alone. Plaintiff cannot recover as a  
28

1 matter of law on her theft cause of action and that claim should be dismissed pursuant to NRCP  
2 12(b)(5).

3 **F. Plaintiff's Cause of Action No. 3 for Trespass**

4 Plaintiff alleges Defendants entered her property while she was incarcerated for animal  
5 cruelty, to steal her dogs. Plaintiff alleges these actions constitute trespass. Plaintiff alleges no  
6 damages resulting from alleged trespass in her Complaint, and therefore, it cannot succeed on the  
7 merits. A necessary element of a trespass claim is damages. Therefore, Plaintiff cannot recover  
8 as a matter of law on her theft cause of action and that claim should be dismissed pursuant to  
9 NRCP 12(b)(5).  
10

11 **G. Plaintiff's Cause of Action No. 4 for Fraud**

12 NRCP 9 creates special rules governing the pleading of specified matters, including fraud.  
13 Plaintiff's first cause of action in her Complaint is based upon alleged fraud. When these  
14 specified matters are material to a pleading, the party must assert in some detail the factual basis  
15 of the matter. *See Ivory Ranch, Inc. v. Quinn River Ranch, Inc.*, 101 Nev. 471, 705 P.2d 673  
16 (1985). An allegation of fraud must provide the circumstances with particularity and must  
17 include the time, place, and identity of the parties and the nature of the fraud. *Rocker v. KPMG*  
18 *LLP*, 122 Nev. 1185, 148 P.3d 703,704 (2006), *abrogated on other grounds by Buzz Stew, LLC v.*  
19 *City of N. Las Vegas*, 124 Nev. 224, 181 P.3d 670 (2008). Because Plaintiff's Complaint fails to  
20 specify the time, place, and identities and the nature of the fraud, it is obvious she will not be able  
21 to recover against Defendants for alleged fraud. In fact, Plaintiff puts forth no evidence that  
22 Defendants and Plaintiff have every had an interaction or any type of conversation,  
23 communication, or discussion whatsoever. She alleges no communication whatsoever between  
24 herself and any of the defendants, and no such communications have ever taken place.  
25  
26  
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28

1 Therefore, Plaintiff cannot recover on her claim for fraud as a matter of law, and therefore her  
2 Complaint should be dismissed pursuant to NRCP 12(b)(5).

3  
4 **H. Plaintiff's Cause of Action No. 5 for Intentional Infliction of Emotional Distress.**

5 For a plaintiff in Nevada to succeed on a claim for intentional infliction of emotional  
6 distress, the plaintiff must show three things: (1) the defendant engaged in extreme and  
7 outrageous conduct with either the intention of, or reckless disregard for, causing emotional  
8 distress, (2) the plaintiff suffered severe or extreme emotional distress, and (3) actual or proximate  
9 causation. *Dillard Dept. Stores, Inc. v. Beckwith*, 115 Nev. 372, 378 (1999) (Citing *Star v. Rabello*, 97 Nev. 124, 125 (1981)). The Nevada Supreme Court defines extreme and outrageous  
10 conduct as "that which is outside all possible bounds of decency and is regarded as utterly  
11 intolerable in a civilized society." *Maduik v. Agency Rent-A-Car*, 114 Nev. 1, 4 (1998) (internal  
12 quotations omitted). *Shoen v. Amerco, Inc.*, 111 Nev. 735, 747 (1995).

13 The Defendants in this matter rescue abused and homeless and neglected dogs. That is  
14 undisputed. It is also undisputed that many German Shepherd Dogs come into the possession of  
15 Defendants, as part of their volunteer efforts to save dogs that have been abused and neglected. If  
16 Defendants came into the possession of any of Plaintiff's dogs, the purpose would have been to  
17 save the dogs lives and provide them with food, shelter, medical treatment, and find them homes.  
18 Plaintiff on the other hand runs an illegal puppy mill and keeps dogs in horrific, cruel, filthy, and  
19 inhumane conditions. If anyone has engaged in extreme and outrageous conduct, it is the  
20 Plaintiff. Because the facts alleged by Plaintiff do not demonstrate any extreme and outrageous  
21 conduct by Defendants, her claim fails as a matter of law and should be dismissed pursuant to  
22 NRCP 12(b)(5).  
23  
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28



**I. Plaintiff cannot recover as a matter of law under the doctrine of “unclean hands”**

Even if this Court accepts all of Plaintiff’s allegations as true, the undisputed facts of this matter conclusively prove that Plaintiff has been operating an illegal puppy mill in San Bernardino County, California in violation of San Bernardino County ordinances. In addition, it is undisputed that Plaintiff has been arrested for and is currently under investigation for felony animal cruelty for keeping dogs hidden in the desert on vacant land without food, water, shelter and their most basic needs.

In determining whether a plaintiff is precluded from recovering against a defendant based upon the plaintiff’s unclean hands, the Nevada Supreme Court has established a two-factor analysis: (1) the egregiousness of the misconduct at issue, and (2) the seriousness of the harm caused by the misconduct. *See Income Investors*, 101 P.2d at 974; *cf. Evans*, 116 Nev. at 610, 5 P.3d at 1050-51; *Banks*, 120 Nev. at 843, 102 P.3d at 66. When these factors weigh against granting the requested relief, the unclean hands doctrine will bar Plaintiff from recovering. *See Evans*, 116 Nev. at 610, 5 P.3d at 1050-51; *Banks*, 120 Nev. at 843, 102 P.3d at 66; *Income Investors*, 101 P.2d at 974; *see also Smith v. Smith*, 68 Nev. 10, 24, 226 P.2d 279, 286 (1951) (recognizing that “the un-clean hands maxim is one founded on public policy”). The district court has broad discretion in applying these factors, and will not be overturned unless it is unsupported by substantial evidence. *Las Vegas Fetish and Fantasy Ball v. Ahern Rentals*, 124 Nev. 272, 276, 182 P.3d 764 (2008). *See also See University Sys. v. Nevadans for Sound Gov’t*, 120 Nev. 712, 721, 100 P.3d 179, 187 (2004) (recognizing the district court’s discretion in granting equitable injunctive relief).

Based upon the forgoing, it is clear that Plaintiff would be precluded from recovering against Defendants due to her “dirty hands” based upon her continuous and illegal activities

1 Therefore, as a matter of law, Plaintiff cannot meet her burden of showing the probability of  
2 success on the merits and her claims should be dismissed pursuant to NRCP 12(b)(5).

3 **III.**

4 **CONCLUSION**

5 Based upon the foregoing, it is respectfully requested that Plaintiff's Complaint be  
6 dismissed.  
7

8 DATED this 18<sup>th</sup> day of June, 2021.

9 **THE LAW OFFICE OF CASEY D. GISH**

10 /s/ Casey D. Gish

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19 *Willet, & Vegas Shepherd Rescue*

20 **WEIR LAW GROUP, LLC**

21 /s/ Shana D. Weir

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THE LAW OFFICE OF  
CASEY D. GISH

CERTIFICATE OF SERVICE

I, Casey D. Gish, declare:

I am a resident of and employed in Clark County, Nevada. I am over the age of eighteen (18) years and not a party to the action within. My business address is 5940 S. Rainbow Blvd., Las Vegas, Nevada 89118.

That I served the document described as **DEFENDANTS' OPPOSITION TO PLAINTIFF'S EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER FROM CUSTODY OF PLAINTIFF'S DOGS AND FOR ORDER TO RETURN PLAINTIFF'S DOGS AND PLAINTIFF'S DECLARATION IN SUPPORT; OPPOSITION TO PLAINTIFF'S MOTION TO AMEND; AND DEFENDANTS' COUNTER-MOTION TO DISMISS PLAINTIFF'S COMPLAINT** on the parties whose address appears below:

X VIA ELECTRONIC SERVICE: in accordance with NRCP through the Odyssey File & Serve electronic filing system. I am "readily familiar" with the firm's practice of electronically serving documents.

ALLA ZORIKOVA  
1905 Wilcox Ave, #175  
Los Angeles. CA 90068  
P: (323) 209-5186  
E: stevejohn19732017@gmail.com  
*Plaintiff*

Executed on the 18<sup>th</sup> day of June, 2021.

*/s/ Casey D. Gish*

An employee of THE LAW OFFICE OF  
CASEY D. GISH

Electronically Filed  
6/18/2021 11:58 PM  
Steven D. Grierson  
CLERK OF THE COURT



## EXHIBIT “1”

1 ORDR

2 EIGHTH JUDICIAL DISTRICT COURT

3 CLARK COUNTY, NEVADA

4 ALLA ZORIKOVA,

Case No. A-20-821249-C

5 Plaintiff,

Dept. No. XX

6 vs.

7 JULIE PYLE, TAMMY WILLET, VEGAS  
8 SHEPHERD RESCUE AND DOES I  
9 THROUGH X, INDIVIDUALS, AND ROE  
10 BUSINESS ENTITIES I THROUGH X,

Defendants.

11 **ORDER**

12 **COURT FINDS** after review that on October 24, 2020, Plaintiff Zorikova filed an Ex Parte  
13 Application for Temporary Restraining Order, after filing a Complaint on September 15, 2020:

14 **COURT FURTHER FINDS** after review that on September 25, 2020 an Order to Proceed  
15 in Forma Pauperis was entered granting Plaintiff's Application to Proceed in Forma Pauperis.  
16

17 **COURT FURTHER FINDS** after review that on October 26, 2020, Defendant Julie Pyle  
18 filed a Demand for Security Costs.

19 **COURT FURTHER FINDS** after review that on October 26, 2020, Defendant Tammy  
20 Willet filed a Demand for Security Costs.

21 **COURT FURTHER FINDS** after review that on October 26, 2020, Defendant Vegas  
22 Shepherd Rescue filed a Demand for Security Costs.  
23  
24

1           **COURT FURTHER FINDS** after review that on October 29, 2020, Plaintiff filed a Motion  
2 to Schedule Hearing on Plaintiff's Ex-Parte Application for Temporary Restraining Order from  
3 Custody of Plaintiff's Dogs and for Order to Return Plaintiff's Dogs and Plaintiff's Declaration in  
4 Support. Subsequently, a hearing was set on December 9, 2020 at 8:30 AM

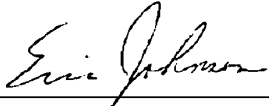
5           **COURT FURTHER FINDS** after review that on October 31, 2020, Plaintiff filed an  
6 Objection to Defendant's Demand for Security Costs on the basis that the Order granting Plaintiff to  
7 proceed in forma pauperis thereby waived court costs. However, security costs as prescribed by NRS  
8 18.130 are statutory and are not waived.

9           **THEREFORE, COURT ORDERS**, after a review that the case cannot move forward until  
10 each security for costs is posted. When security for costs is posted, a hearing can be set on  
11 Plaintiff's Ex-Parte Application for Temporary Restraining Order from Custody of Plaintiff's Dogs  
12 and for Order to Return Plaintiff's Dogs and Plaintiff's Declaration in Support. Service will be  
13 required on all parties. All hearings are done remotely through the Bluejeans application. When a  
14 hearing is set, a link will be sent to all parties.

15           **IT IS HEREBY FURTHER ORDERED** the hearing on December 9, 2020 is VACATED.  
16

17  
18 DATED this \_\_\_\_\_ day of December, 2020.

Dated this 4th day of December, 2020

19  
20   
21 \_\_\_\_\_  
22 ERIC JOHNSON  
23 DISTRICT COURT JUDGE  
24 10B B32 44B3 40B1  
Eric Johnson  
District Court Judge

1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Alla Zorikova, Plaintiff(s)

CASE NO: A-20-821249-C

7 vs.

DEPT. NO. Department 20

8 Julie Pyle, Defendant(s)

9  
10 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 12/4/2020

15 Casey Gish, Esq.

casey@gishlawfirm.com

16 If indicated below, a copy of the above mentioned filings were also served by mail  
17 via United States Postal Service, postage prepaid, to the parties listed below at their last  
18 known addresses on 12/7/2020

19 Alla Zorikova

1905 wilcox ave, #175  
los angeles, CA, 90068

20 Casey Gish

21 Van Law Firm  
22 Attn: Casey D. Gish  
5940 S. Rainbow Blvd.  
23 Las Vegas, NV, 89118

**PLEADING  
CONTINUES  
IN NEXT  
VOLUME**