

1 **NOAS**
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Electronically Filed
Mar 21 2022 03:36 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**DISTRICT COURT
CLARK COUNTY, NEVADA**

8 **ROBERT G. REYNOLDS**, an individual,
9 **DIAMANTI FINE JEWELERS, LLC**, a
10 Nevada limited liability company,

Case No.: A-17-753532-B

Dept. No.: 13

11 Plaintiffs,

12 vs.

13 **RAFFI TUFENKJIAN**, an individual,
14 and **LUXURY HOLDINGS LV, LLC**, a
15 Nevada Limited Liability Company,
16 **DOES 1-10**, and **ROE CORPORATIONS**
17 1-10 inclusive,

18 Defendants.

NOTICE OF APPEAL

20 Notice is hereby given that **ROBERT REYNOLDS**, and **DIAMANTI**
21 **FINE JEWELERS, LLC**, Plaintiff above named, hereby appeals to the Supreme
22 Court of Nevada from the **NOTICE OF ENTRY OF ORDER GRANTING**
23 **DEFENDANTS' MOTION FOR ATTORNEY'S FEES AND COSTS**, entered
24 in this action on the 15th day of February 2021.

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27 ///

1 **DATED** this 16th day of March 2022.

2
3 Submitted by:

4
5 By Joseph Z. Gersten
6 JOSEPH Z. GERSTEN, ESQ.
7 Nevada Bar No.: 13876
8 The Gersten Law Firm PLLC
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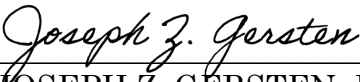
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THE GERSTEN LAW FIRM PLLC
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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of March 2022, I filed a true and correct copy of the **NOTICE OF APPEAL** using the Eighth Judicial District's electronic filing system and/or deposited a true and correct copy in the United States Mail at Las Vegas, Nevada, enclosed in a sealed envelope, first class mail, postage prepaid, addressed as follows:

Terry A. Moore, Esq.
Nevada Bar No. 7831
Christian T. Balducci, Esq.
Nevada Bar No. 12688
10001 Park Run Drive
Las Vegas, NV 89145
Attorney for Defendants



JOSEPH Z. GERSTEN, ESQ.
An Employee of The Gersten Law Firm PLLC

DISTRICT COURT
CASE SUMMARY
CASE NO. A-17-753532-B

Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

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§

Location: **Department 13**
Judicial Officer: **Denton, Mark R.**
Filed on: **04/05/2017**
Case Number History: **A-17-753532-C**
Cross-Reference Case Number: **A753532**
Supreme Court No.: **78187**
84000

CASE INFORMATION

Statistical Closures

11/19/2021 Judgment Reached (bench trial)
11/14/2018 Summary Judgment

Case Type: **Other Business Court Matters**

Case Flags: **Appealed to Supreme Court**
Business Court
Other Contract Case

DATE

CASE ASSIGNMENT

Current Case Assignment

Case Number A-17-753532-B
Court Department 13
Date Assigned 05/02/2017
Judicial Officer Denton, Mark R.

PARTY INFORMATION

Lead Attorneys

Plaintiff

Diamanti Jewelers LLC

Reyco LLC

Removed: 05/12/2017
Inactive

Reynolds, Robert G.

Pro Se
702-435-5200(H)

Defendant

Great Wash Park LLC

Removed: 04/25/2019
Dismissed

Luxury Holdings LV LLC

Moore, Terry A, ESQ
Retained
702-382-0711(W)

Tufenkjian, Raffi

Moore, Terry A, ESQ
Retained
702-382-0711(W)

DATE

EVENTS & ORDERS OF THE COURT

INDEX

04/05/2017



Complaint

Filed By: Plaintiff Reynolds, Robert G.
[1] Complaint

04/13/2017



Acceptance of Service

Filed By: Plaintiff Reynolds, Robert G.
[2] Acceptance of Service












04/28/2017



Notice of Appearance

Party: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC












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	<i>[3] Notice of Appearance of Counsel for Defendants Raffi Tufenkjian and Luxury Holdings LV LLC</i>
04/28/2017	 Initial Appearance Fee Disclosure Filed By: Defendant Luxury Holdings LV LLC <i>[4] Initial Appearance Fee Disclosure</i>
05/02/2017	Other Contract Case
05/02/2017	 Request to Transfer to Business Court Filed by: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[6] Request to Transfer to Business Court</i>
05/03/2017	 Notice of Department Reassignment <i>[5] Notice of Department Reassignment</i>
05/12/2017	 First Amended Complaint Filed By: Plaintiff Reynolds, Robert G. <i>[7] First Amended Complaint</i>
05/25/2017	 Motion to Dismiss Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[9] Motion to Dismiss Against Robert Reynolds and Each of His Claims</i>
05/26/2017	 Answer to Amended Complaint Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[8] Defendants' Answer to Diamanti Fine Jewelers LLC's First Amended Complaint, Only</i>
05/30/2017	 Notice of Motion Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[10] Notice of Motion</i>
06/13/2017	 Business Court Order <i>[11] Business Court Order</i>
06/16/2017	 Opposition to Motion to Dismiss Filed By: Plaintiff Reynolds, Robert G. <i>[12] Defendant Robert Reynolds' Opposition to Defendants' Motion to Dismiss Robert Reynolds and Each of His Claims</i>
06/26/2017	 Reply in Support Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[13] Reply in Support of Motion to Dismiss Against Robert Reynolds and Each of His Claims</i>
07/06/2017	 Motion to Dismiss (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Defendant's Motion to Dismiss Against Robert Reynolds and each of his Claims</i> Granted in Part; <i>Granted in Part</i>
07/10/2017	 Mandatory Rule 16 Conference (2:00 PM) (Judicial Officer: Denton, Mark R.) MINUTES Matter Heard; <i>Matter Heard</i>













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CASE SUMMARY
CASE NO. A-17-753532-B

SCHEDULED HEARINGS












CANCELED Status Check (08/10/2017 at 9:00 AM) (Judicial Officer: Denton, Mark R.)
Vacated
Status Check Re JCCR Filing

07/17/2017	 Order Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[14] Order Granting in Part and Denying in Part</i>
07/18/2017	 Notice of Entry of Order Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[15] Notice of Entry of Order</i>
07/19/2017	 Order Setting Civil Non-Jury Trial <i>[16] Order Re Rule 16 Conference, Setting Civil Non-Jury Trial, Calendar Call, and Deadlines for Motions; Discovery Scheduling Order</i>
07/25/2017	 Second Amended Complaint Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[17] Second Amended Complaint</i>
08/01/2017	 Joint Case Conference Report Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[18] Joint Case Conference Report</i>
08/03/2017	 Recorders Transcript of Hearing <i>[19] Recorders Transcript of Hearing Re: Defendant's Motion To Dismiss Against Robert Reynolds And Each Of His Claims, July 6, 2017</i>
08/07/2017	 Motion to Dismiss Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[20] Motion to Dismiss Against Robert Reynolds and Each of His Claims</i>
08/10/2017	CANCELED Status Check (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated</i> <i>Status Check Re JCCR Filing</i>
08/23/2017	 Stipulation and Order Filed by: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[21] Stipulation and Order to Continue Hearing and for Briefing Schedule</i>
08/23/2017	 Notice of Entry of Stipulation and Order Filed By: Defendant Tufenkjian, Raffi <i>[22] Notice of Entry of Stipulation and Order</i>
09/06/2017	 Opposition to Motion to Dismiss Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[23] Opposition To Motion To Dismiss And Counter Motion For Leave To File Third Amended Complaint</i>
09/12/2017	 Reply to Motion Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[24] Defendants' Reply in Support of Motion to Dismiss Robert Reynolds' Claims and Opposition to Counter-Motion for Leave to File Third Amended Complaint</i>













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09/14/2017	 Reply in Support Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[25] Reply Brief in Support of Counter-Motion for Leave to File Third Amended Complaint</i>
09/18/2017	Motion to Dismiss (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Defendants, Raffi Tufenkjian and Luxury Holdings LV, LLC's Motion to Dismiss Against Robert Reynolds and Each of His Claims</i> Denied; <i>Denied</i>
09/18/2017	Opposition and Countermotion (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Plaintiffs, Robert G. Reynolds and Diamanti Fine Jewelers, LLC's Opposition to Motion to Dismiss and Counter Motion for Leave to File Third Amended Complaint</i> Granted; <i>Granted</i>
09/18/2017	 All Pending Motions (9:00 AM) (Judicial Officer: Denton, Mark R.) Matter Heard; <i>Matter Heard</i>
10/26/2017	 Order <i>[26] Order Denying Defendant's Motion to Dismiss & Granting Counter-Motion for Leave to File Third Amended Complaint</i>
10/30/2017	 Notice of Entry of Order Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[27] Notice of Entry of Order</i>
11/01/2017	 Summons Electronically Issued - Service Pending Party: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[28] Summons</i>
11/01/2017	 Amended Complaint Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[29] Third Amended Complaint</i>
11/06/2017	 Summons Filed by: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[30] Summons - Civil</i>
01/16/2018	 Stipulation and Order <i>[31] Stipulation and Order to Continue Discovery and Trial</i>
01/18/2018	 Notice of Entry of Stipulation and Order Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[32] Notice of Entry of Stipulation and Order</i>
01/18/2018	 Stipulated Protective Order <i>[33] Stipulated Confidentiality Agreement and Protective Order</i>
01/19/2018	 Notice of Entry of Order Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[34] Notice of Entry of Order</i>
01/22/2018	 Order Setting Civil Non-Jury Trial and Calendar Call














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	<i>[35] Order Setting Civil Non-Jury Trial and Calendar Call</i>
07/02/2018	CANCELED Calendar Call (2:00 PM) (Judicial Officer: Denton, Mark R.) <i>Vacated - per Stipulation and Order</i>
07/10/2018	CANCELED Bench Trial (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated - per Stipulation and Order</i>
07/26/2018	 Answer to Amended Complaint Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[36] Answer to Third Amended Complaint</i>
08/10/2018	 Motion Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[37] Defendants' Motion to Exceed Page Limit of Defendants' Motion for Summary Judgment</i>
08/10/2018	 Motion for Summary Judgment Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[38] Defendants' Motion for Summary Judgment</i>
08/10/2018	 Appendix Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[39] Appendix in Support of Defendants' Motion for Summary Judgment</i>
08/30/2018	 Stipulation and Order Filed by: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[40] Stipulation and Order to Extend Deadline for Plaintiffs' Opposition to Motion for Summary Judgment</i>
09/05/2018	 Opposition to Motion For Summary Judgment Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[41] Plaintiffs' Opposition to Motion for Summary Judgment</i>
09/06/2018	 Minute Order (2:00 PM) (Judicial Officer: Denton, Mark R.) <i>Re: Defendants Motion to Exceed Page Limit of Defendants Motion for Summary Judgment</i> Minute Order - No Hearing Held; Minute Order - No Hearing Held
09/06/2018	 Opposition to Motion For Summary Judgment Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[42] Plaintiffs' Opposition to Motion for Summary Judgment</i>
09/10/2018	CANCELED Motion (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated</i> <i>Defendants' Motion to Exceed Page Limit of Defendants' Motion for Summary Judgment</i>
09/11/2018	 Stipulation and Order Filed by: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[43] Stipulation and Order to Continue Hearing on Motion for Summary Judgment</i>
09/18/2018	 Notice of Entry of Stipulation and Order Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[44] Notice of Entry of Stipulation and Order</i>
09/21/2018	 Reply







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CASE NO. A-17-753532-B

	Filed by: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[45] Reply to Defendants' Motion for Summary Judgment</i>
09/27/2018	 Motion for Summary Judgment (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Defendants' Motion for Summary Judgment</i> Granted; <i>Granted</i>
10/12/2018	 Decision <i>[46] Decision</i>
10/15/2018	 Order <i>[47] Order Rescheduling Calendar Call</i>
10/29/2018	 Ex Parte Application Party: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[48] Ex Parte Application Pre-Judgment Writ of Attachment</i>
10/29/2018	 Notice of Hearing Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[50] Notice of Hearing</i>
10/30/2018	 Receipt of Copy Filed by: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[49] Receipt of Copy</i>
11/01/2018	 Hearing (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Ex Parte Application Pre-Judgment Writ of Attachement</i> Granted in Part; <i>Granted in Part</i>
11/13/2018	 Calendar Call (1:00 PM) (Judicial Officer: Denton, Mark R.) Matter Heard; <i>Matter Heard</i>
11/13/2018	 Decision <i>[51] Decision</i>
11/14/2018	Summary Judgment (Judicial Officer: Denton, Mark R.) Debtors: Robert G. Reynolds (Plaintiff), Diamanti Jewelers LLC (Plaintiff) Creditors: Raffi Tufenkjian (Defendant), Luxury Holdings LV LLC (Defendant) Judgment: 11/14/2018, Docketed: 11/15/2018 Comment: Amended in Part to Certain Paragraph 5 pg.6 - 1/28/19 Per Order
11/14/2018	 Order Granting Summary Judgment Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[52] (1/28/19 Per Order Amending Only In Part as to Certain Paragraph 5,pg. 6 "Removing Therefore" and Denying the Rest.) Order Granting Summary Judgment</i>
11/16/2018	 Notice of Entry of Order Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[53] Notice of Entry of Order</i>
11/16/2018	 Memorandum of Costs and Disbursements Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC

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	<i>[54] Verified Memorandum of Costs and Disbursements</i>
11/20/2018	 Notice of Posting Bond Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[55] Notice of Posting Surety Bond</i>
11/26/2018	 Motion for Attorney Fees and Costs Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[56] Defendants' Motion for Attorney's Fees and Costs</i>
11/27/2018	CANCELED Bench Trial (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated</i>
11/27/2018	 Motion to Withdraw As Counsel Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[57] Motion to Withdraw as Attorney of Record</i>
11/27/2018	 Motion to Amend Judgment Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[58] Plaintiffs' Motion to Amend Judgment</i>
11/28/2018	 Certificate of Service <i>[59] Certificate of Service</i>
11/30/2018	 Notice of Non Opposition Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[60] Notice of Non-Opposition to Motion to Withdraw, Only</i>
12/03/2018	 Order Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[61] Order</i>
12/03/2018	 Order Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[62] Order</i>
12/04/2018	 Notice of Entry of Order Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[63] Notice of Entry of Order</i>
12/04/2018	 Notice of Entry of Order Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[64] Notice of Entry of Order</i>
12/05/2018	 Opposition to Motion Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[65] Defendants' Opposition to Plaintiffs' Motion to Amend Judgment</i>
12/12/2018	 Opposition to Motion Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[66] Plaintiffs' Opposition to Motion for Attorneys' Fees and Costs</i>
01/04/2019	 Reply in Support Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC

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	<i>[67] Defendants' Reply in Support of Motion for Attorney's Fees and Costs</i>
01/07/2019	Motion for Attorney Fees and Costs (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Defendants' Motion for Attorney's Fees and Costs</i> Granted in Part; <i>Granted in Part</i>
01/07/2019	Motion to Withdraw as Counsel (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Motion to Withdraw as Attorney of Record</i> Granted; <i>Granted</i>
01/07/2019	Motion to Amend Judgment (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Plaintiffs' Motion to Amend Judgment</i> Granted in Part; <i>Granted in Part</i>
01/07/2019	 All Pending Motions (9:00 AM) (Judicial Officer: Denton, Mark R.) Matter Heard; <i>Matter Heard</i>
01/18/2019	 Order Granting <i>[68] Order Granting Peter L. Chasey's Motion to Withdraw as Plaintiffs' Counsel of Record</i>
01/23/2019	Order (Judicial Officer: Denton, Mark R.) Debtors: Robert G. Reynolds (Plaintiff), Diamanti Jewelers LLC (Plaintiff) Creditors: Raffi Tufenkjian (Defendant), Luxury Holdings LV LLC (Defendant), Great Wash Park LLC (Defendant) Judgment: 01/23/2019, Docketed: 01/23/2019 Total Judgment: 57,941.92 Comment: In Part
01/23/2019	 Decision <i>[69] Decision</i>
01/28/2019	 Order <i>[70] Order Granting in Part, Denying in Part, Plaintiffs' Motion to Amend Judgment</i>
01/29/2019	 Notice of Entry of Order Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[71] Notice of Entry of Order</i>
01/29/2019	 Notice of Entry of Order <i>[72] Notice of Entry of Order</i>
02/14/2019	Order (Judicial Officer: Denton, Mark R.) Debtors: Robert G. Reynolds (Plaintiff), Diamanti Jewelers LLC (Plaintiff) Creditors: Luxury Holdings LV LLC (Defendant) Judgment: 02/14/2019, Docketed: 02/14/2019 Total Judgment: 50,000.00 Debtors: Robert G. Reynolds (Plaintiff), Diamanti Jewelers LLC (Plaintiff) Creditors: Raffi Tufenkjian (Defendant), Luxury Holdings LV LLC (Defendant) Judgment: 02/14/2019, Docketed: 02/14/2019 Total Judgment: 7,941.92
02/14/2019	Judgment (Judicial Officer: Denton, Mark R.) Debtors: Robert G. Reynolds (Plaintiff), Diamanti Jewelers LLC (Plaintiff) Creditors: Luxury Holdings LV LLC (Defendant)

DISTRICT COURT
CASE SUMMARY
CASE NO. A-17-753532-B

Judgment: 02/14/2019, Docketed: 02/14/2019













Total Judgment: 5,000.00

Debtors: Robert G. Reynolds (Plaintiff), Diamanti Jewelers LLC (Plaintiff)












Creditors: Raffi Tufenkjian (Defendant)

Judgment: 02/14/2019, Docketed: 02/14/2019














Total Judgment: 7,941.92

02/14/2019	 Order Granting Motion Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[73] Order Granting Defendants' Motion for Attorney's Fees and Costs and Judgment Against Plaintiffs</i>
02/19/2019	 Notice of Entry of Order Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[74] Notice of Entry of Order</i>
02/19/2019	 Case Appeal Statement <i>[75] Case Appeal Statement</i>
02/19/2019	 Notice of Appeal <i>[76] Notice of Appeal</i>
03/25/2019	 Writ Electronically Issued Party: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[77] Writ of Execution</i>
03/27/2019	 Writ Electronically Issued Party: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[78] Writ of Execution</i>
03/28/2019	 Writ Electronically Issued Party: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[79] Writ of Execution - Choses in Action</i>
04/05/2019	 Motion for Stay of Execution <i>[80] Motion to Stay Execution and Enforcement of Judgment Pending Appeal on an Order Shortening Time</i>
04/16/2019	 Opposition to Motion Filed By: Defendant Tufenkjian, Raffi; Plaintiff Diamanti Jewelers LLC <i>[81] Opposition to Motion for Stay of Execution</i>
04/24/2019	 Claim <i>[82] Claim of Exemption from Execution</i>
04/24/2019	 Claim <i>[83] Claim of Exemption from Execution</i>
04/25/2019	 Voluntary Dismissal <i>[84] Voluntary Dismissal of Great Wash Park, LLC</i>
04/25/2019	Dismissal Pursuant to NRCP 41 (Judicial Officer: Denton, Mark R.) Debtors: Great Wash Park LLC (Defendant) Creditors: Robert G. Reynolds (Plaintiff), Diamanti Jewelers LLC (Plaintiff) Judgment: 04/25/2019, Docketed: 05/02/2019

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05/03/2019	 Objection Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[85] Objection to Claim for Exemption - Ninacci, Inc.</i>
05/03/2019	 Objection Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[86] Objection to Claim for Exemption - Robert Reynolds</i>
05/06/2019	 Clerk's Notice of Hearing <i>[87] Notice of Hearing</i>
05/06/2019	 Clerk's Notice of Hearing <i>[88] Notice of Hearing</i>
05/13/2019	Objection (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Objection to Claim of Exemption from Execution (Plaintiff Robert Reynolds)</i> Sustained; <i>Sustained</i>
05/13/2019	Objection (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Objection to Claim of Exemption from Execution (Third Party Ninacci, Inc.,)</i> Matter Resolved; <i>Matter Resolved</i>
05/13/2019	 All Pending Motions (9:00 AM) (Judicial Officer: Denton, Mark R.) Matter Heard; <i>Matter Heard</i>
05/13/2019	 Stipulation and Order for Dismissal With Prejudice <i>[89] Stip and Order to Dismiss Great Wash Park LLC With Prejudice</i>
05/13/2019	Order of Dismissal With Prejudice (Judicial Officer: Denton, Mark R.) Debtors: Great Wash Park LLC (Defendant) Creditors: Robert G. Reynolds (Plaintiff), Diamanti Jewelers LLC (Plaintiff) Judgment: 05/13/2019, Docketed: 05/13/2019
05/13/2019	 Notice of Entry of Stipulation & Order for Dismissal <i>[90] Notice of Entry of Stipulation and Order for Dismissal of Great Wash Park LLC With Prejudice</i>
05/14/2019	 Minute Order (10:00 AM) (Judicial Officer: Denton, Mark R.) <i>Re: Defendants' Objection to Claim of Exemption from Execution (Robert Reynolds)</i> Minute Order - No Hearing Held; <i>Minute Order - No Hearing Held</i>
05/20/2019	 Notice of Sheriff's Sale Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[91] Notice of Sheriff's Sale</i>
06/03/2019	 Order Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[92] Order Sustaining Objection to Claim of Exemption from Execution</i>
06/03/2019	 Notice of Entry of Order


DISTRICT COURT
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CASE NO. A-17-753532-B

	Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[93] Notice of Entry of Order - Order Sustaining Objection to Claim of Exemption from Execution</i>
06/04/2019	 Affidavit of Publication Filed By: Plaintiff Reynolds, Robert G.; Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC; Plaintiff Diamanti Jewelers LLC <i>[94] Affidavit of Publication</i>
07/09/2019	 Affidavit of Posting Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[95] Affidavit of Posting</i>
07/18/2019	 Certificate Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[96] Certificate of Sale of Personal Property</i>
07/18/2019	 Notice Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[97] Notice of Filing Certificate of Sale of Personal Property</i>
09/10/2019	 Notice of Sheriff's Sale <i>[98] Notice of Sheriff's Sale of Personal Property</i>
09/24/2019	 Affidavit of Publication Filed By: Plaintiff Reynolds, Robert G.; Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC; Plaintiff Diamanti Jewelers LLC <i>[99] Affidavit of Publication</i>
09/24/2019	 Affidavit of Posting Filed By: Defendant Tufenkjian, Raffi <i>[100] Affidavit of Posting</i>
10/10/2019	 Writ of Execution Filed by: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[101] Writ of Execution</i>
10/10/2019	 Certificate Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[102] Certificate of Sale of Personal Property</i>
03/18/2021	 NV Supreme Court Clerks Certificate/Judgment - Affd/Rev Part <i>[103] Nevada Supreme Court Clerk's Certificate/Remittitur Judgment - Affirmed in Part, Reversed in Part and Remand; Rehearing Denied; Petition Denied</i>
03/22/2021	 Order Scheduling Status Check <i>[104] Order Re: Status Check</i>
04/13/2021	 Minute Order (1:45 PM) (Judicial Officer: Denton, Mark R.) <i>Re: BlueJeans Appearance</i> Minute Order - No Hearing Held; <i>Minute Order - No Hearing Held</i>
04/15/2021	 Status Check (9:00 AM) (Judicial Officer: Denton, Mark R.)


DISTRICT COURT
CASE SUMMARY
CASE NO. A-17-753532-B

Status check re: further proceedings
Matter Heard;
Matter Heard


04/21/2021

 Order Setting Civil Non-Jury Trial
[105] Order Setting Civil Non-Jury Trial and Calendar Call


09/08/2021

 Joint Pre-Trial Memorandum
Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC
[106] Joint Pre-Trial Memorandum


09/09/2021

 **Minute Order** (7:00 AM) (Judicial Officer: Denton, Mark R.)
Re: BlueJeans Appearance
Minute Order - No Hearing Held;
Minute Order - No Hearing Held


09/13/2021

 **Calendar Call** (2:00 PM) (Judicial Officer: Denton, Mark R.)
Trial Date Set;
Trial Date Set

09/20/2021

 **Minute Order** (7:15 AM) (Judicial Officer: Denton, Mark R.)
Re: BlueJeans Appearance for Trial
Minute Order - No Hearing Held;
Minute Order - No Hearing Held


09/20/2021

 Proof of Service
Filed by: Defendant Tufenkjian, Raffi
[107] Proof of Service of Trial Subpoena of Robert Reynolds


09/20/2021

 Brief
Filed By: Defendant Tufenkjian, Raffi
[108] Civil Trial Memoranda in Accord with EDCR 7.27: Burden of Proof and Fraud Elements


09/21/2021

 **Non-Jury Trial** (9:00 AM) (Judicial Officer: Denton, Mark R.)
09/21/2021-09/22/2021, 10/06/2021
Trial Continues;
Trial Continues;
Court Finds for Defendant;
Trial Continues;
Trial Continues;
Court Finds for Defendant;
Trial Continues;
Trial Continues;
Court Finds for Defendant;
Trial Continues














09/27/2021

 Stipulation and Order
Filed by: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC
[109] Stipulation and Order to Continue the Resumption of Trial to October 6 and 7, 2021










09/27/2021

 Notice of Entry of Stipulation and Order
Filed By: Defendant Tufenkjian, Raffi
[110] Notice of Entry of Stipulation and Order




DISTRICT COURT
CASE SUMMARY
CASE NO. A-17-753532-B

09/29/2021	 Recorders Transcript of Hearing <i>[111] Recorder's Transcript of Hearing Re: Non-Jury Trial - Day 2 - September 22, 2021</i>
10/28/2021	 Findings of Fact, Conclusions of Law and Order <i>[112] Proposed Findings of Fact and Conclusions of Law with Order</i>
10/28/2021	 Findings of Fact, Conclusions of Law and Judgment Filed by: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[113] Raffi Tufenkjian and Luxury Holdings LV, LLC's Proposed Findings of Fact, Conclusions of Law, and Judgment</i>
11/19/2021	 Findings of Fact, Conclusions of Law and Judgment <i>[114] Findings of Fact, Conclusions of Law, and Judgment</i>
11/22/2021	Judgment (Judicial Officer: Denton, Mark R.) Debtors: Robert G. Reynolds (Plaintiff), Diamanti Jewelers LLC (Plaintiff) Creditors: Raffi Tufenkjian (Defendant), Luxury Holdings LV LLC (Defendant) Judgment: 11/22/2021, Docketed: 11/22/2021
11/23/2021	 Motion to Withdraw As Counsel Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[115] Motion to Withdraw as Counsel for Plaintiffs Robert G. Reynolds and Diamanti Fine Jewelers LLC</i>
11/23/2021	 Clerk's Notice of Hearing <i>[116] Notice of Hearing</i>
11/24/2021	 Certificate of Service <i>[117] Supplement to Certificate of Service</i>
11/24/2021	 Memorandum of Costs and Disbursements Filed By: Defendant Tufenkjian, Raffi <i>[118] Verified Memorandum of Costs and Disbursements</i>
11/24/2021	 Notice of Entry of Findings of Fact, Conclusions of Law Filed By: Defendant Tufenkjian, Raffi <i>[119] Notice of Entry of Findings of Facts, Conclusion of Law, and Judgment</i>
12/15/2021	 Motion for Attorney Fees and Costs Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[120] Defendants' Motion for Attorney's Fees and Costs</i>
12/16/2021	 Clerk's Notice of Hearing Party: Defendant Tufenkjian, Raffi <i>[121] Notice of Hearing</i>
12/20/2021	 Notice of Appeal Filed By: Plaintiff Reynolds, Robert G. <i>[122] Notice of Appeal - NOAS (CIV)</i>
12/27/2021	 Opposition to Motion Filed By: Plaintiff Reynolds, Robert G.; Plaintiff Diamanti Jewelers LLC <i>[123] Plaintiffs' Opposition to Defendants Motion for Fees and Costs</i>

DISTRICT COURT
CASE SUMMARY
CASE NO. A-17-753532-B

12/29/2021	 Reply in Support Filed By: Defendant Tufenkjian, Raffi <i>[124] Reply in Support of their Motion for Attorney's Fees and Costs</i>
01/04/2022	 Minute Order (7:00 AM) (Judicial Officer: Denton, Mark R.) <i>Re: BlueJeans Appearance</i> Minute Order - No Hearing Held; <i>Minute Order - No Hearing Held</i>
01/06/2022	Motion to Withdraw as Counsel (9:00 AM) (Judicial Officer: Denton, Mark R.) Events: 11/23/2021 Motion to Withdraw As Counsel <i>Motion to Withdraw as Counsel for Plaintiffs Robert G. Reynolds and Diamanti Fine Jewelers LLC</i> Granted; <i>Granted</i>
01/06/2022	Motion for Attorney Fees and Costs (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>[120] Defendants' Motion for Attorney's Fees and Costs</i> Granted; <i>Granted</i>
01/06/2022	 All Pending Motions (9:00 AM) (Judicial Officer: Denton, Mark R.) Matter Heard; <i>Matter Heard</i>
01/25/2022	 Order to Withdraw as Attorney of Record <i>[125] Order Granting Motion to Withdraw as Counsel for Plaintiffs Robert G. Reynolds and Diamanti Fine Jewelers LLC</i>
01/26/2022	 Minute Order (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Re: Defendants' Motion for Attorney's Fees and Costs</i> Minute Order - No Hearing Held; <i>Minute Order - No Hearing Held</i>
01/26/2022	 Notice of Entry of Order <i>[126] Notice of Entry of Order Granting Motion to Withdraw As Counsel For Plaintiffs Robert G. Reynolds and Diamanti Fine Jewelers LLC</i>
02/15/2022	 Order Granting Motion <i>[127] Order Granting Defendants' Motion for Attorney's Fees and Costs</i>
02/15/2022	 Notice of Entry of Order Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[128] Notice of Entry of Order Granting Defendants' Motion for Attorneys' Fees and Costs</i>
02/15/2022	Judgment (Judicial Officer: Denton, Mark R.) Debtors: Robert G. Reynolds (Plaintiff), Diamanti Jewelers LLC (Plaintiff) Creditors: Raffi Tufenkjian (Defendant), Luxury Holdings LV LLC (Defendant) Judgment: 02/15/2022, Docketed: 02/16/2022 Total Judgment: 120,802.42 Comment: \$7,744.42 of that amount being in favor of Raffi Tufenkjian
02/28/2022	 Notice of Intent Filed By: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[129] Notice of Intent to Serve Subpoena Duces Tecum</i>

DISTRICT COURT
CASE SUMMARY
CASE NO. A-17-753532-B

03/03/2022	 Writ Electronically Issued Party: Defendant Tufenkjian, Raffi; Defendant Luxury Holdings LV LLC <i>[130] Writ of Execution</i>	
03/16/2022	 Notice of Appeal Filed By: Plaintiff Reynolds, Robert G. <i>[131] Notice of Appeal</i>	
03/16/2022	 Notice of Appeal Filed By: Plaintiff Reynolds, Robert G. <i>[132] Corrected Notice of Appeal</i>	

DATE	FINANCIAL INFORMATION	
	Plaintiff Reyco LLC	
	Total Charges	30.00
	Total Payments and Credits	30.00
	Balance Due as of 3/18/2022	0.00
	Defendant Luxury Holdings LV LLC	
	Total Charges	31.00
	Total Payments and Credits	31.00
	Balance Due as of 3/18/2022	0.00
	Defendant Tufenkjian, Raffi	
	Total Charges	1,933.50
	Total Payments and Credits	1,933.50
	Balance Due as of 3/18/2022	0.00
	Plaintiff Reynolds, Robert G.	
	Total Charges	373.00
	Total Payments and Credits	373.00
	Balance Due as of 3/18/2022	0.00
	Plaintiff Reynolds, Robert G.	
	Appeal Bond Balance as of 3/18/2022	500.00

BUSINESS COURT CIVIL COVER SHEET

Clark County, Nevada
Case No. A-17-753532-C-B XIII
(Assigned by Clerk's Office)

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

Plaintiff(s) (name/address/phone):
Robert G. Reynolds; Reyco, LLC dba Diamanti Fine Jewelers

Attorney (name/address/phone):
Peter L. Chasey, Esq. (NV Bar No. 7650)
Chasey Law Offices
3295 N. Forte Apache Road, Suite 110
Las Vegas, Nevada 89129
(702) 233-0393

Defendant(s) (name/address/phone):
Raffi Tufenkjian; Luxury Holdings LV, LLC

Attorney (name/address/phone):
Christian T. Balducci, Esq. (NV Bar No. 7650)
Marquis Aurbach Coffing
10001 Park Rub Drive
Las Vegas, NV 89145
(702) 382-0711

II. Nature of Controversy (Please check the applicable boxes for both the civil case type and business court case type)

☐ Arbitration Requested

Civil Case Filing Types		Business Court Filing Types
Real Property	Torts	CLARK COUNTY BUSINESS COURT
Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	Negligence <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice Other Torts <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort	<input type="checkbox"/> NRS Chapters 78-89 <input type="checkbox"/> Commodities (NRS 91) <input type="checkbox"/> Securities (NRS 90) <input type="checkbox"/> Mergers (NRS 92A) <input type="checkbox"/> Uniform Commercial Code (NRS 104) <input type="checkbox"/> Purchase/Sale of Stock, Assets, or Real Estate <input type="checkbox"/> Trademark or Trade Name (NRS 600) <input type="checkbox"/> Enhanced Case Management <input checked="" type="checkbox"/> Other Business Court Matters
Construction Defect & Contract	Civil Writs	WASHOE COUNTY BUSINESS COURT
Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input checked="" type="checkbox"/> Other Contract	<input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ	<input type="checkbox"/> NRS Chapters 78-88 <input type="checkbox"/> Commodities (NRS 91) <input type="checkbox"/> Securities (NRS 90) <input type="checkbox"/> Investments (NRS 104 Art. 8) <input type="checkbox"/> Deceptive Trade Practices (NRS 598) <input type="checkbox"/> Trademark/Trade Name (NRS 600) <input type="checkbox"/> Trade Secrets (NRS 600A) <input type="checkbox"/> Enhanced Case Management <input type="checkbox"/> Other Business Court Matters
Judicial Review/Appeal/Other Civil Filing		
Judicial Review <input type="checkbox"/> Foreclosure Mediation Case Appeal Other <input type="checkbox"/> Appeal from Lower Court	Other Civil Filing <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters	

5/3/17

Date

/s/ Christian T. Balducci

Signature of initiating party or representative

OGM
Marquis Aurbach
Christian T. Balducci, Esq.
Nevada Bar No. 12688
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
tmoore@maclaw.com
cbalducci@maclaw.com
Attorneys for Defendants

DISTRICT COURT

CLARK COUNTY, NEVADA

ROBERT G. REYNOLDS, an individual,
DIAMANTI FINE JEWELERS, LLC, a Nevada
limited liability company,

Plaintiffs,

vs.

RAFFI TUFENKJIAN, an individual, and
LUXURY HOLDINGS LV, LLC, a Nevada
Limited Liability Company, DOES 1-10, and
ROE CORPORATIONS 1-10 inclusive,

Defendants.

Case No.: A-17-753532-B
Dept. No.: 13

Hearing Date: January 6, 2022
Hearing Time: 9:00 a.m.

ORDER GRANTING DEFENDANTS'
MOTION FOR ATTORNEY'S FEES AND COSTS

THIS MATTER having come before this Court on January 6, 2022, on Defendants' Motion for Attorney's Fees and Costs; Christian T. Balducci, Esq. of the law firm of Marquis Aurbach appearing on behalf of Raffi Tufenkjian and Luxury Holdings LV, LLC ("Defendants") and Bradley M. Marx of the Marx Law Firm, PPC, appearing on behalf of Plaintiffs Robert G. Reynolds and Diamanti Fine Jewelers, LLC ("Plaintiffs").

This Court, having reviewed the papers and pleadings on file herein, the evidence and declarations on file herein, the papers and pleadings filed in this matter, and oral argument of counsel, hereby ORDERS that Defendants' Motion for Attorney's Fees and Costs is GRANTED IN PART, and enters further MONETARY JUDGMENT, based on the following:

1 1. Defendants' Motion seeks attorney's fees based on a contractual provision and, in
2 the alternative, based on rejected offers of judgment under NRCP 68.

3 2. The contract at the heart of this litigation contained an express and unambiguous
4 provision entitling the prevailing party to recover reasonable attorney's fees and costs incurred in
5 litigation arising out of the contract. *See* Plaintiff's offer dated January 12, 2015; Defendants'
6 counter-offer dated January 13, 2015; and Closing Agreement dated March 24, 2015.

7 3. Thus, both Plaintiff Reynolds and Plaintiff Diamanti are contractually bound to
8 this fee provision.

9 4. Because Plaintiffs filed suit based on allegations that the Defendants
10 misrepresented material facts about the business's profitability during negotiations of the sale
11 agreement, as well as for an alleged breach of contract, this litigation arises out of the contract
12 between the parties, and thus the prevailing party is entitled to reasonable attorney's fees and
13 costs.

14 5. Previously, Defendants obtained summary judgment against all of Plaintiffs
15 claims, and on February 14, 2019, this Court awarded Defendants \$50,000.00 in attorney fees
16 and \$7,941.92 in costs as further set forth in that order, notice of entry of which was noticed and
17 entered on February 19, 2019 ("**First Fee and Cost Award**").

18 6. Defendants began execution on the First Fee and Cost Award, which resulted in
19 only \$200.00 in collections.

20 7. Plaintiffs appealed the summary judgment order.

21 8. On appeal, the claims for breach of contract and negligent misrepresentation were
22 dismissed. *See Reynolds v. Tufenkjian*, 136 Nev. Adv. Op. 19, 475 P.3d 777 (2020).

23 9. Summary judgment against the elder abuse claim was affirmed on the basis that
24 the underlying transaction was at arms' length, and thus there could not be a relationship of
25 "trust and confidence" between Mr. Reynolds and Mr. Tufenkjian.

26 10. Summary judgment against the intentional misrepresentation was reversed.

27 11. A bench trial was conducted on Plaintiffs' fraud claims culminating in this
28 Court's findings of fact, conclusions of law, and judgment entered on November 19, 2021, in

1 which this Court rendered judgment in favor of the Defendants, and against Plaintiffs, notice of
2 entry of which was filed and served on November 24, 2021.

3 12. Defendants filed a timely memorandum of costs and disbursements seeking all of
4 the costs incurred in this matter which total \$15,686.34.

5 13. The \$15,686.34 includes costs the Defendants previously applied for, which were
6 awarded in connection with the First Fee and Cost Award.

7 14. Defendants also filed a timely motion for attorney fees seeking all of the attorney
8 fees reasonably incurred in this matter totaling \$163,058.00 minus \$200.00 in sums collected
9 from the First Fee and Cost Award.

10 15. Based upon the contract, Luxury Holdings LV, LLC is entitled to recover
11 reasonable attorney's fees and costs incurred in this action.

12 16. Mr. Tufenkjian and Luxury Holdings LV, LLC prevailed in this action following
13 a bench trial before this Court.

14 17. As prevailing parties, both Mr. Tufenkjian and Luxury Holdings LV, LLC are
15 entitled to costs.

16 18. On May 25, 2017, Defendants served offers of judgment to both Plaintiff
17 Reynolds and Plaintiff Diamanti Fine Jewelers, LLC for \$250.00 and \$5,000.00, respectively.

18 19. The decision to award attorney fees is within the sound discretion of the Court.
19 *Allianz Ins. Co. v. Gagnon*, 109 Nev. 990 (1993) (citing *County of Clark v. Blanchard Constr.*
20 *Co.*, 98 Nev. 488, 492, 653 P.2d 1217, 1220 (1982)).

21 20. The Court considers the amounts offered in Defendants' respective offers of
22 judgment to be unlikely to have elicited serious consideration of acceptance in the context of the
23 contentions being vehemently advanced by Plaintiffs at the time the offers were made. *See*
24 *Beattie v. Thomas*, 99 Nev. 579, 588, 668 P.2d 753 (1983). Thus, the Court applies the subject
25 contractual provision in awarding attorney's fees in lieu of NRCP 68.

26 21. The Nevada Supreme Court has mandated that a district court analyze the
27 reasonableness of attorney's fees by considering the factors enumerated in *Brunzell v. Golden*
28 *Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969), which are (1) the qualities of the

1 advocate; (2) the character of the work to be done; (3) the work actually performed; and (4) the
2 result.

3 22. The Court has analyzed the *Brunzell* factors as they relate to the instant motion,
4 and agrees with Defendants' analysis proffered in the Motion. The Court further finds that
5 Plaintiff Reynolds has wide experience in business transactions, that Plaintiffs made serious
6 allegations against Defendants, and that it would reasonably be expected that Defendants would
7 vigorously defend themselves, which they did in a professional and appropriate manner. In light
8 of these considerations, the Court awards all fees and costs incurred in this action as set forth in
9 Defendants' motion for attorney fees and the verified memorandum of costs.

10 23. During the hearing in this matter, counsel for Plaintiffs said he took no issue with
11 the First Fee and Cost Award and requested that the Court address all additionally incurred fees
12 and costs.

13 24. Consequently, this Court finds it will address all additionally incurred fees and
14 costs via this order granting Defendants fees and costs.

15 25. This makes the most sense since the First Fee and Cost Award will have accrued
16 interest since the date of its entry.

17 26. Why this may cause some confusion since there will be a different renewal date
18 for the First Fee and Cost Award when compared to this award, legally it is appropriate to have
19 two separate, stand alone fee and cost awards, each of which can be the subject of their own
20 collection proceedings and execution, among all other remedies available to a judgment creditor.

21 27. Simply for the sake of clarification since it was raised in the opposition, the First
22 Fee and Cost Award is a standalone fee and cost award, which is good, valid, and collectable
23 separate from this fee and cost award.

24 28. Because the First Fee and Cost Award was never the subject of an appeal, it was
25 never vacated as a result of the reversal of the previously entered summary judgment order and
26 remained (and remains) a valid award.

27 ///

28 ///

ORDER

IT IS HEREBY ORDERED, ADJUDGED AND DECREED

1. Defendants' Motion for Attorney's Fees and Costs is GRANTED IN PART.

2. Defendant Luxury Holdings LV, LLC is awarded additional attorney's fees in the sum of \$113,058.00, and Defendants Luxury Holdings LV, LLC and Raffi Tufenkjian are awarded additional costs in the sum of \$7,744.42.

3. The First Fee and Cost Award is a valid fee and cost award which is collectable separate from this particular fee and cost award.

4. Based upon the foregoing, further award and judgment is hereby entered and against Plaintiffs Robert G. Reynolds and Diamanti Fine Jewelers, LLC, in the total amount of \$120,802.42, with that entire amount being in favor Defendant Luxury Holdings LV, LLC, and \$7,744.42 of that amount being in favor of Raffi Tufenkjian (joint and severally against each of the Plaintiffs).

IT IS SO ORDERED.

Dated this 15th day of February, 2022



ABG
C88 A8B 912F 6D99
Mark R. Denton
District Court Judge

Respectfully Submitted By:

MARQUIS AURBACH

By: /s/ Christian T. Balducci
Christian T. Balducci, Esq.
Nevada Bar No. 12688
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendants

1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Robert Reynolds, Plaintiff(s)

CASE NO: A-17-753532-B

7 vs.

DEPT. NO. Department 13

8 Raffi Tufenkjian, 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 Granting Motion was served via the court's electronic eFile
13 system to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 2/15/2022

15 Peter Chasey .

peter@chaseylaw.com

16 Shannon .

shannon@chaseylaw.com

17 Christian Balducci

cbalducci@maclaw.com

18 Joseph Gersten

joe@thegerstenlawfirm.com

19 Bradley Marx

brad@marxfirm.com

20 Lynda Arzate-Reza

larzate@maclaw.com

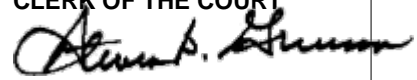
21 Nicara Brown

nicara@thegerstenlawfirm.com

22 Diana Gonzalez

diana@thegerstenlawfirm.com

23
24
25
26
27
28



NEOJ
Marquis Aurbach
Christian T. Balducci, Esq.
Nevada Bar No. 12688
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
cbalducci@maclaw.com
Attorneys for Defendants

DISTRICT COURT

CLARK COUNTY, NEVADA

ROBERT G. REYNOLDS, an individual,
DIAMANTI FINE JEWELERS, LLC, a Nevada
limited liability company,

Case No.: A-17-753532-B
Dept. No.: 13

Plaintiffs,

vs.

**NOTICE OF ENTRY OF ORDER
GRANTING DEFENDANTS' MOTION
FOR ATTORNEY'S FEES AND COSTS**

RAFFI TUFENKJIAN, an individual, and
LUXURY HOLDINGS LV, LLC, a Nevada
Limited Liability Company, DOES 1-10, and
ROE CORPORATIONS 1-10 inclusive,

Defendants.

PLEASE TAKE NOTICE that on February 15, 2022, an Order Granting Defendants' Motion for Attorney's Fees and Costs was entered in the above-entitled matter, a copy of which is attached hereto.

Dated this 15th day of February 2022.

MARQUIS AURBACH

/s/ Christian T. Balducci
Christian T. Balducci, Esq.
Nevada Bar No. 12688
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **NOTICE OF ENTRY OF ORDER GRANTING DEFENDANTS' MOTION FOR ATTORNEY'S FEES AND COSTS** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 15th day of February 2022. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:¹

N/A

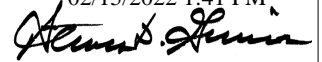
I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to:

Robert G. Reynolds
6885 W. Lone Mountain Rd., Apt. 140
Las Vegas, Nevada 89108
Plaintiff

Diamanti Fine Jewelers
5117 Cedar Lawn Drive
Las Vegas, Nevada 89130
Plaintiff

/s/ Kellie Piet
An employee of Marquis Aurbach Coffing

¹ Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).


CLERK OF THE COURT

OGM
Marquis Aurbach
Christian T. Balducci, Esq.
Nevada Bar No. 12688
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
tmoore@maclaw.com
cbalducci@maclaw.com
Attorneys for Defendants

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Case No.: A-17-753532-B
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Hearing Date: January 6, 2022
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ORDER GRANTING DEFENDANTS'
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THIS MATTER having come before this Court on January 6, 2022, on Defendants' Motion for Attorney's Fees and Costs; Christian T. Balducci, Esq. of the law firm of Marquis Aurbach appearing on behalf of Raffi Tufenkjian and Luxury Holdings LV, LLC ("Defendants") and Bradley M. Marx of the Marx Law Firm, PPC, appearing on behalf of Plaintiffs Robert G. Reynolds and Diamanti Fine Jewelers, LLC ("Plaintiffs").

This Court, having reviewed the papers and pleadings on file herein, the evidence and declarations on file herein, the papers and pleadings filed in this matter, and oral argument of counsel, hereby ORDERS that Defendants' Motion for Attorney's Fees and Costs is GRANTED IN PART, and enters further MONETARY JUDGMENT, based on the following:

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3 2. The contract at the heart of this litigation contained an express and unambiguous
4 provision entitling the prevailing party to recover reasonable attorney's fees and costs incurred in
5 litigation arising out of the contract. *See* Plaintiff's offer dated January 12, 2015; Defendants'
6 counter-offer dated January 13, 2015; and Closing Agreement dated March 24, 2015.

7 3. Thus, both Plaintiff Reynolds and Plaintiff Diamanti are contractually bound to
8 this fee provision.

9 4. Because Plaintiffs filed suit based on allegations that the Defendants
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6 awarded in connection with the First Fee and Cost Award.

7 14. Defendants also filed a timely motion for attorney fees seeking all of the attorney
8 fees reasonably incurred in this matter totaling \$163,058.00 minus \$200.00 in sums collected
9 from the First Fee and Cost Award.

10 15. Based upon the contract, Luxury Holdings LV, LLC is entitled to recover
11 reasonable attorney's fees and costs incurred in this action.

12 16. Mr. Tufenkjian and Luxury Holdings LV, LLC prevailed in this action following
13 a bench trial before this Court.

14 17. As prevailing parties, both Mr. Tufenkjian and Luxury Holdings LV, LLC are
15 entitled to costs.

16 18. On May 25, 2017, Defendants served offers of judgment to both Plaintiff
17 Reynolds and Plaintiff Diamanti Fine Jewelers, LLC for \$250.00 and \$5,000.00, respectively.

18 19. The decision to award attorney fees is within the sound discretion of the Court.
19 *Allianz Ins. Co. v. Gagnon*, 109 Nev. 990 (1993) (citing *County of Clark v. Blanchard Constr.*
20 *Co.*, 98 Nev. 488, 492, 653 P.2d 1217, 1220 (1982)).

21 20. The Court considers the amounts offered in Defendants' respective offers of
22 judgment to be unlikely to have elicited serious consideration of acceptance in the context of the
23 contentions being vehemently advanced by Plaintiffs at the time the offers were made. *See*
24 *Beattie v. Thomas*, 99 Nev. 579, 588, 668 P.2d 753 (1983). Thus, the Court applies the subject
25 contractual provision in awarding attorney's fees in lieu of NRCP 68.

26 21. The Nevada Supreme Court has mandated that a district court analyze the
27 reasonableness of attorney's fees by considering the factors enumerated in *Brunzell v. Golden*
28 *Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969), which are (1) the qualities of the

1 advocate; (2) the character of the work to be done; (3) the work actually performed; and (4) the
2 result.

3 22. The Court has analyzed the *Brunzell* factors as they relate to the instant motion,
4 and agrees with Defendants' analysis proffered in the Motion. The Court further finds that
5 Plaintiff Reynolds has wide experience in business transactions, that Plaintiffs made serious
6 allegations against Defendants, and that it would reasonably be expected that Defendants would
7 vigorously defend themselves, which they did in a professional and appropriate manner. In light
8 of these considerations, the Court awards all fees and costs incurred in this action as set forth in
9 Defendants' motion for attorney fees and the verified memorandum of costs.

10 23. During the hearing in this matter, counsel for Plaintiffs said he took no issue with
11 the First Fee and Cost Award and requested that the Court address all additionally incurred fees
12 and costs.

13 24. Consequently, this Court finds it will address all additionally incurred fees and
14 costs via this order granting Defendants fees and costs.

15 25. This makes the most sense since the First Fee and Cost Award will have accrued
16 interest since the date of its entry.

17 26. Why this may cause some confusion since there will be a different renewal date
18 for the First Fee and Cost Award when compared to this award, legally it is appropriate to have
19 two separate, stand alone fee and cost awards, each of which can be the subject of their own
20 collection proceedings and execution, among all other remedies available to a judgment creditor.

21 27. Simply for the sake of clarification since it was raised in the opposition, the First
22 Fee and Cost Award is a standalone fee and cost award, which is good, valid, and collectable
23 separate from this fee and cost award.

24 28. Because the First Fee and Cost Award was never the subject of an appeal, it was
25 never vacated as a result of the reversal of the previously entered summary judgment order and
26 remained (and remains) a valid award.

27 ///

28 ///

ORDER

IT IS HEREBY ORDERED, ADJUDGED AND DECREED

1. Defendants' Motion for Attorney's Fees and Costs is GRANTED IN PART.

2. Defendant Luxury Holdings LV, LLC is awarded additional attorney's fees in the sum of \$113,058.00, and Defendants Luxury Holdings LV, LLC and Raffi Tufenkjian are awarded additional costs in the sum of \$7,744.42.

3. The First Fee and Cost Award is a valid fee and cost award which is collectable separate from this particular fee and cost award.

4. Based upon the foregoing, further award and judgment is hereby entered and against Plaintiffs Robert G. Reynolds and Diamanti Fine Jewelers, LLC, in the total amount of \$120,802.42, with that entire amount being in favor Defendant Luxury Holdings LV, LLC, and \$7,744.42 of that amount being in favor of Raffi Tufenkjian (joint and severally against each of the Plaintiffs).

IT IS SO ORDERED.

Dated this 15th day of February, 2022



ABG
C88 A8B 912F 6D99
Mark R. Denton
District Court Judge

Respectfully Submitted By:

MARQUIS AURBACH

By: /s/ Christian T. Balducci
Christian T. Balducci, Esq.
Nevada Bar No. 12688
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendants

1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Robert Reynolds, Plaintiff(s)

CASE NO: A-17-753532-B

7 vs.

DEPT. NO. Department 13

8 Raffi Tufenkjian, 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 Granting Motion was served via the court's electronic eFile
13 system to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 2/15/2022

15 Peter Chasey .

peter@chaseylaw.com

16 Shannon .

shannon@chaseylaw.com

17 Christian Balducci

cbalducci@maclaw.com

18 Joseph Gersten

joe@thegerstenlawfirm.com

19 Bradley Marx

brad@marxfirm.com

20 Lynda Arzate-Reza

larzate@maclaw.com

21 Nicara Brown

nicara@thegerstenlawfirm.com

22 Diana Gonzalez

diana@thegerstenlawfirm.com

23
24
25
26
27
28

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

July 06, 2017

A-17-753532-B	Robert Reynolds, Plaintiff(s) vs. Raffi Tufenkjian, Defendant(s)
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July 06, 2017	9:00 AM	Motion to Dismiss
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HEARD BY: Denton, Mark R.	COURTROOM: RJC Courtroom 03D
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COURT CLERK: Marwanda Knight

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:	Balducci, Christian T.	Attorney
	Chasey, Peter L.	Attorney
	Moore, Terry A, ESQ	Attorney
	Tufenkjian, Raffi	Defendant

JOURNAL ENTRIES

- In support of the Motion, Mr. Balducci argued that Pltf, Robert Reynolds lacks standing, noting he lacks a legally enforceable right to pursue a claim. In response, Mr. Chasey argued Mr. Reynolds personally satisfies the standing to proceed in this case.

Following argument, Court stated it could not say that the Complaint fails to state claims upon which relief can be granted, and ORDERED, Motion DENIED WITHOUT PREJUDICE to any Rule 56 practice. Colloquy regarding the guarantee issue and Pltf amending the Complaint.

Court revised its ruling, and ORDERED, Motion GRANTED WITHOUT PREJUDICE to Pltf seeking leave to amend, noting the Court could not grant an amendment without a proposed pleading as the rule requires. Mr. Balducci stated he would stipulate to counsel filing an amended pleading, to which Mr. Chasey agreed.

Following additional review of the Complaint, Court stated it would require a more definite statement, and ORDERED, Motion GRANTED IN PART to the extent it seeks a more definite

statement; DENIED to the extent it seeks dismissal.

Mr. Balducci directed to submit the proposed order; Mr. Chasey directed to promptly file and serve the amended complaint, which is DEEMED to contain a more definite statement relative to your contentions. Additional colloquy as to pushing back the Rule 16 Conference currently scheduled for Monday, July 10, 2017 to allow all parties to appear. Court stated the conference would remain in place.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

July 10, 2017

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

**July 10, 2017 2:00 PM Mandatory Rule 16
Conference**

HEARD BY: Denton, Mark R.

COURTROOM: No Location

COURT CLERK: Marwanda Knight

RECORDER:

REPORTER:

PARTIES

PRESENT: Balducci, Christian T. Attorney
Chasey, Peter L. Attorney

JOURNAL ENTRIES

- Counsel met with the Court in Chambers for the purpose of the Mandatory Rule 16 Conference. Colloquy regarding the Court's ruling and the Pltff filing a more definite statement. Court advised discovery is now heard by the Department for Business Court matters and all discovery motions should be directed to this Court's attention. Further, Court noted counsel could consider today's conference to be their Rule 16.1 Conference.

Thereafter, Court stated that it still requires a Joint Case Conference Report and directed it to be submitted by the close of business on July 31, 2017; the JCCR is to comply with NRCP 16.1(c)(1,3, & 4). COURT ORDERED, status check SET for August 10, 2017 at 9:00 am to determine if the Joint Case Conference Report (JCCR) has been filed. If filed, attendance is not required. However, if the JCCR has not been filed counsel must appear to explain why it has not been filed and the amount of time needed for compliance.

Upon the Court's inquiry as to how much time counsel would require for discovery; both counsel confirmed they would require nine (9) months until the close of discovery. Court advised that based

upon that date the Department would issue a combined Scheduling/Trial Order. Based upon the stipulation of counsel and Order of the Court, Court advised counsel could start discovery now. Court further noted that the case is currently being carried as a non-jury case.

Mr. Balducci addressed Pltfs preserving due diligence material received by the buyer, which includes a computer system and having an IT vendor coming in to retrieve the material. Court queried whether Mr. Chasey had discussed protecting and perserving the system for discovery purosses with his clients, to which Mr. Chasey indicated he had and that Mr. Balducci retrieving the material would not be a problem. Colloquy regarding the parties signing a confidentiality agreement.

The Court then queried counsel as to the case being ripe for a Settlement Conference; however, Mr. Balducci stated it would be premature until Pltf could get an understanding of what their damages are. Court directed counsel to contact the Department's Judicial Executive Assistant if at some point there was a consensus for a Settlement Conference. If no consensus, the party that desires a Settlement Conference may file a motion to compel.

08/10/2017 9:00 A.M. | STATUS CHECK RE: JCCR FILING

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

September 18, 2017

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

September 18, 2017 9:00 AM All Pending Motions

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Marwanda Knight

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- APPEARANCES: Peter Chasey, Attorney for Pltf
Christian Balducci, Attorney for Defts
Raffi Tufenkjian, Deft

DEFENDANTS, RAFFI TUFENKJIAN AND LUXURY HOLDINGS LV, LLC's MOTION TO DISMISS AGAINST ROBERT REYNOLDS AND EACH OF HIS CLAIMS ... PLAINTIFFS, ROBERT G. REYNOLDS AND DIAMANTI FINE JEWELERS, LLC's OPPOSITION TO MOTION TO DISMISS AND COUNTERMOTION FOR LEAVE TO FILE THIRD AMENDED COMPLAINT

Following argument by counsel, COURT STATED ITS FINDINGS, and ORDERED, Motion DENIED and FURTHER ORDERED, Countermotion GRANTED.

Counsel for Pltf to submit the proposed order.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

September 06, 2018

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

September 06, 2018 2:00 PM Minute Order

HEARD BY: Denton, Mark R.

COURTROOM: Chambers

COURT CLERK: Madalyn Kearney

RECORDER:

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- Cause appearing, and pursuant to EDCR 2.20(e) and EDCR 2.23 (c), the Court GRANTS Defendants Motion to Exceed Page Limit of Defendants Motion for Summary Judgment without oral argument and ORDERS such Motion removed from its civil motion calendar of Monday, September 10, 2018. Counsel for Defendants to submit a proposed Order.

IT IS SO ORDERED.

CLERK'S NOTE: A copy of this minute order was sent via fax to: Terry A. Moore, Esq. (702-382-5816) and Peter L. Chasey, Esq. (702-233-2107) /mk 9/6/18

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

September 27, 2018

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

**September 27, 2018 9:00 AM Motion for Summary
Judgment**

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Elizabeth Vargas

RECORDER: Sandra Pruchnic

REPORTER:

PARTIES

PRESENT: Balducci, Christian T. Attorney
Chasey, Peter L. Attorney

JOURNAL ENTRIES

- Court noted it reviewed the briefs. Arguments by counsel regarding the Motion. COURT ORDERED, matter TAKEN UNDER ADVISEMENT.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

November 01, 2018

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

November 01, 2018 9:00 AM Hearing

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Sandra Pruchnic

REPORTER:

PARTIES

PRESENT:	Balducci, Christian T.	Attorney
	Chasey, Peter L.	Attorney
	Reynolds, Robert G.	Plaintiff
	Tufenkjian, Raffi	Defendant

JOURNAL ENTRIES

- Arguments by Mr. Balducci and Mr. Chasey regarding Defendant's Ex Parte Application Pre-Judgment Writ of Attachment. COURT ORDERED, Ex Parte Application Pre-Judgment Writ of Attachment UNDER ADVISEMENT. Court advised in the meantime it will enter an injunction against the disposition of the items set forth in the pictures. Mr. Chasey inquired if his client is prevented from selling the items through a proper sale. Colloquy regarding selling the items in the pictures, some of the items being in possession with a memo of consignment and cash flow concerns. Court advised the injunction will not preclude or bar sales in the ordinary course of business that are commercially reasonable; monies derived from those sales will be applied as appropriate to the consignors and there will be an injunction against disposition of any balance until further order of the Court. Statement by Plaintiff. Mr. Balducci suggested setting up a blocked account for the funds. Court noted a blocked account is appropriate; the balance remaining after payment of the consignors will not be disposed of and Plaintiff can apply to the Court to dispose of the funds. Mr. Balducci to prepare the order.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

November 13, 2018

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

November 13, 2018 1:00 PM Calendar Call

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Sandra Pruchnic

REPORTER:

PARTIES

PRESENT: Balducci, Christian T. Attorney

JOURNAL ENTRIES

- Mr. Balducci advised he spoke with Mr. Chasey's office and confirmed no one will be appearing today. Court noted there was a Motion before the Court and the Court disposed of all claims in the case. As such, there is nothing left to try. Mr. Balducci concurred. Accordingly, Court advised there will be no setting in the case. Court added it signed the order that was submitted today.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

January 07, 2019

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

January 07, 2019 9:00 AM All Pending Motions

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Balducci, Christian T. Attorney
Chasey, Peter L. Attorney

JOURNAL ENTRIES

- DEFENDANT'S MOTION FOR ATTORNEY'S FEES AND COSTS...MOTION TO WITHDRAW AS ATTORNEY OF RECORD...PLAINTIFFS' MOTION TO AMEND JUDGMENT

Following arguments by Mr. Chasey and Mr. Balducci, COURT ORDERED, Plaintiffs' Motion to Amend Judgment GRANTED IN PART only in reference to Paragraph 5, removing the first sentence in Paragraph 5 that states "While Plaintiffs asserted that there are material misrepresentations that formed the foundation of Plaintiffs' claims, Plaintiffs failed to reference any particular records which evidence such misrepresentations." and removing "therefore" from the following sentence. Following arguments by Mr. Balducci and Mr. Chasey regarding Defendants' Motion for Attorney's Fees and Costs, COURT FURTHER ORDERED, Motion UNDER ADVISEMENT. As to the Motion to Withdraw, Mr. Balducci advised he had no opposition. There being no opposition, COURT ORDERED, Motion to Withdraw as Attorney of Record GRANTED.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

May 13, 2019

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

May 13, 2019

9:00 AM

All Pending Motions

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES**PRESENT:**

Moore, Terry A, ESQ
Reynolds, Robert G.

Attorney
Plaintiff

JOURNAL ENTRIES

- Bradley Marx, Esq., appellate counsel for Plaintiff, also present. Raman Nourizad, Representative for Ninacci, Inc., present telephonically.

Mr. Marx advised his appearance in this court is limited to cleaning up the record in order to go forward with the appeal. As such, there was another Defendant that was served but has not made an appearance; the Supreme Court has requested Mr. Marx get a dismissal in order to go forward with the appeal. Mr. Marx advised he has a proposed stipulation and order to dismiss with prejudice as to that entity and provided it to the Court. Mr. Moore had no objection. Court read the stipulation and order into the record. Stipulation and Order for Dismissal of Great Wash Park, LLC, with Prejudice SIGNED IN OPEN COURT. Mr. Marx added the motions today are outside the scope of his representation and he will not be arguing. Court so noted. Court noted it appears the Objection to Claim of Exemption from Execution regarding Third Party Ninacci, Inc. is moot as something in the record indicates that item has been settled. Mr. Moore advised an agreement has been reached with Ninacci to provide further release of the items being held by the Sheriff that are listed in memorandums 614712, 62833, and 63834. Court so noted the settlement. Arguments by Mr. Moore and Mr. Reynolds regarding the Objection to Claim of Exemption from Execution (Plaintiff Robert Reynolds). COURT ORDERED, Objection to Claim of Exemption from Execution (Plaintiff Robert

Reynolds) UNDER ADVISEMENT.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

May 14, 2019

A-17-753532-B	Robert Reynolds, Plaintiff(s)
	vs.
	Raffi Tufenkjian, Defendant(s)

May 14, 2019	10:00 AM	Minute Order
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HEARD BY: Denton, Mark R.	COURTROOM: Chambers
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COURT CLERK: Madalyn Kearney

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- HAVING further reviewed the subject of Defendants Objection to Claim of Exemption from Execution pertaining to Plaintiff Robert Reynolds coming before the Court on May 13, 2019 and then taken under advisement, and being now fully advised in the premises, the Court SUSTAINS such Objection.

The within ruling is without prejudice to Plaintiffs Motion for Stay of Execution which was filed on April 5, 2019 but which has not been noticed for hearing.

Counsel for Defendants is directed to submit a proposed order consistent herewith.

IT IS SO ORDERED.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Madalyn Kearney, to all registered parties for Odyssey File & Serve. /mk 5/14/19

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

April 13, 2021

A-17-753532-B	Robert Reynolds, Plaintiff(s)
	vs.
	Raffi Tufenkjian, Defendant(s)

April 13, 2021	1:45 PM	Minute Order
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HEARD BY: Denton, Mark R.	COURTROOM: Chambers
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COURT CLERK: Madalyn Kearney

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- Until further notice, Department 13 will be conducting court hearings REMOTELY using the BlueJeans Video Conferencing system. Department 13 has adopted this policy as a precautionary measure in light of public health concerns for Coronavirus COVID-19, and the Court orders that any party intending to appear before Department 13 for law and motion matters do so by BlueJeans only. As a result, your matter scheduled April 15, 2021 in this case will be conducted via BlueJeans. You have the choice to appear either by phone or computer/video.

Dial the following number: 1-408-419-1715
Meeting ID: 751 790 305
URL: [bluejeans.com/ 751790305](https://bluejeans.com/751790305)

To connect by phone, dial the number provided and enter the meeting ID followed by #.

To connect by computer if you do NOT have the app, copy the URL link into a web browser. Google Chrome is preferred but not required. Once you are on the BlueJeans website click on Join with Browser which is located on the bottom of the page. Follow the instructions and prompts given by BlueJeans.

You may also download the BlueJeans app and join the meeting by entering the meeting ID.

PLEASE NOTE the following protocol each participant will be required to follow:

You will be automatically muted upon entry to the meeting. Please remain muted while waiting for your matter to be called. If you are connecting by phone, you can mute/unmute yourself on your phone or by pressing *4.

Do NOT place the call on hold since some phones may play wait/hold music.

Please do NOT use speaker phone as it causes a loud echo/ringing noise.

Please state your name each time you speak so that the court recorder can capture a clear record.

Please be mindful of rustling papers, background noise, and coughing or loud breathing.

Please be mindful of where your camera is pointing.

We encourage you to visit the Bluejeans.com website to get familiar with the BlueJeans phone/videoconferencing system before your hearing.

If your hearing gets continued to a different date after you have already received this minute order please note a new minute order will issue with a different meeting ID since the ID number changes with each meeting/hearing.

Please be patient if you call in and we are in the middle of oral argument from a previous case. Your case should be called shortly. Again, please keep your phone or computer mic on MUTE until your case is called.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Madalyn Kearney, to all registered parties for Odyssey File & Serve. /mk 4/13/21

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

April 15, 2021

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

April 15, 2021 9:00 AM Status Check

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Balducci, Christian T. Attorney

JOURNAL ENTRIES

- Bradley Marx, Esq. present for Plaintiff Robert Reynolds. Counsel present via BlueJeans.

Mr. Balducci advised the case went up on appeal, the summary judgment order was reversed, and discovery already closed. As such, Mr. Balducci requested a trial date be set. Mr. Marx concurred. Upon Court's inquiry, counsel confirmed a jury demand was not made. Upon Court's inquiry, counsel had no preference as to when to set trial. Court advised it will issue a new trial order.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

September 09, 2021

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

September 09, 2021 7:00 AM Minute Order

HEARD BY: Denton, Mark R.

COURTROOM: Chambers

COURT CLERK: Madalyn Kearney

RECORDER:

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- Until further notice, Department 13 will be conducting court hearings REMOTELY using the BlueJeans Video Conferencing system. Department 13 has adopted this policy as a precautionary measure in light of public health concerns for Coronavirus COVID-19, and the Court orders that any party intending to appear before Department 13 for law and motion matters do so by BlueJeans only. As a result, your matter scheduled September 13, 2021 in this case will be conducted via BlueJeans. You have the choice to appear either by phone or computer/video.

Dial the following number: 1-408-419-1715

Meeting ID: 869 862 085

Participant Passcode: 0049

URL: <https://bluejeans.com/869862085/0049>

To connect by phone, dial the number provided and enter the meeting ID followed by #.

To connect by computer if you do NOT have the app, copy the URL link into a web browser. Google Chrome is preferred but not required. Once you are on the BlueJeans website click on Join with Browser which is located on the bottom of the page. Follow the instructions and prompts given by BlueJeans.

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Do NOT place the call on hold since some phones may play wait/hold music.

Please do NOT use speaker phone as it causes a loud echo/ringing noise.

Please state your name each time you speak so that the court recorder can capture a clear record.

Please be mindful of rustling papers, background noise, and coughing or loud breathing.

Please be mindful of where your camera is pointing.

We encourage you to visit the Bluejeans.com website to get familiar with the BlueJeans phone/videoconferencing system before your hearing.

If your hearing gets continued to a different date after you have already received this minute order please note a new minute order will issue with a different meeting ID since the ID number changes with each meeting/hearing.

Please be patient if you call in and we are in the middle of oral argument from a previous case. Your case should be called shortly. Again, please keep your phone or computer mic on MUTE until your case is called.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Madalyn Kearney, to all registered parties for Odyssey File & Serve. /mk 9/9/21

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

September 13, 2021

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

September 13, 2021 2:00 PM Calendar Call

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Trisha Garcia

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- Bradley Marx, Esq. present for Plaintiffs. Robert Loftus, Esq. present for Defendants. Counsel present for BlueJeans.

Upon Court's inquiry, counsel estimated trial to take two days, announced ready for trial, and provided their availability. MATTER TRAILED.

MATTER RECALLED. All parties present as before. COURT ORDERED, September 21, 2021 trial date STANDS. Court noted Pre-Trial Memoranda have already been filed.

9/21/21 9:00 AM NON-JURY TRIAL

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

September 20, 2021

A-17-753532-B	Robert Reynolds, Plaintiff(s)
	vs.
	Raffi Tufenkjian, Defendant(s)

September 20, 2021 7:15 AM Minute Order

HEARD BY: Denton, Mark R.

COURTROOM: Chambers

COURT CLERK: Madalyn Kearney

RECORDER:

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- In accordance with AO 21-03, Department 13 will be conducting Non-Jury Trial in this case REMOTELY using the BlueJeans Video Conferencing system. Counsel/ Parties in proper person and witnesses are to appear only by video conferencing and not by telephone. A notary is NOT required to be present with the witness if the witness is testifying via video conferencing.

The following URL and meeting ID will be used for the entire length of the trial. Please distribute this information to your witnesses as this is the information they will need in order to testify.

Meeting ID: 869 862 085

Participant Passcode: 0049

URL: <https://bluejeans.com/869862085/0049>

To connect by computer if you do NOT have the app, copy the URL link into a web browser. Google Chrome is preferred but not required. Once you are on the BlueJeans website click on Join with Browser which is located on the bottom of the page. Follow the instructions and prompts given by BlueJeans.

You may also download the BlueJeans app and join the meeting by entering the meeting ID.

You are encouraged to visit bluejeans.com to familiarize yourself with the BlueJeans system before trial.

PLEASE NOTE the following protocol for trial:

Please mute yourself when you are not speaking. During examination of a witness, both the witness and person examining can be unmuted in order to prevent delays.

Counsel/ Parties in proper person are required to provide witnesses copies of all exhibits prior to their testimony. If counsel/ parties in proper person intend to cross-examine a witness with a document or documents, they must provide copies to the witness before cross-examination begins. It is incumbent on counsel/ parties in proper person to provide the above BlueJeans meeting information to their witnesses before the start of trial. We recommend counsel/ parties in proper person test with their witnesses at least 24 hours in advance of their testimony to address any technical issues there may be.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Madalyn Kearney, to all registered parties for Odyssey File & Serve. /mk 9/20/21

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

September 21, 2021

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

September 21, 2021 9:00 AM Non-Jury Trial

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:	Balducci, Christian T.	Attorney
	Reynolds, Robert G.	Plaintiff
	Tufenkjian, Raffi	Defendant

JOURNAL ENTRIES

- Bradley Marx, Esq. present for Plaintiffs. All parties present via BlueJeans.

Opening statement by Mr. Marx. Mr. Balducci reserved his opening statement for his case in chief.
Testimony and exhibits presented (see worksheets). COURT ORDERED, trial CONTINUED.

CONTINUED TO: 9/22/21 9:00 AM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

September 22, 2021

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

September 22, 2021 9:00 AM Non-Jury Trial

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:	Balducci, Christian T.	Attorney
	Reynolds, Robert G.	Plaintiff
	Tufenkjian, Raffi	Defendant

JOURNAL ENTRIES

- Bradley Marx, Esq. also present for Plaintiffs. All parties present via BlueJeans.

Testimony and exhibits presented (see worksheets). Mr. Balducci moved for a directed verdict. Arguments by Mr. Balducci and Mr. Marx regarding the Rule 52(c) motion. Court noted in looking at Rule 52(c), the Court may decline to render any judgment until the close of evidence. Accordingly, COURT ORDERED, Rule 52(c) motion DENIED. COURT FURTHER ORDERED, trial CONTINUED.

CONTINUED TO: 9/28/21 1:00 PM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

October 06, 2021

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

October 06, 2021 9:00 AM Non-Jury Trial

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Balducci, Christian T. Attorney
Reynolds, Robert G. Plaintiff
Tufenkjian, Raffi Defendant

JOURNAL ENTRIES

- Bradley Marx, Esq. present for Plaintiffs. All parties present via BlueJeans.

Testimony and exhibits presented (see worksheets). Defense RESTED. Closing arguments by Mr. Marx and Mr. Balducci. Court directed counsel to each file and serve proposed findings of fact and conclusions of law and proposed judgment by close of business October 28, 2021. COURT ORDERED, decision UNDER ADVISEMENT as of that date.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

January 04, 2022

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

January 04, 2022 7:00 AM Minute Order

HEARD BY: Denton, Mark R.

COURTROOM: Chambers

COURT CLERK: Madalyn Kearney

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- Until further notice, Department 13 will be conducting court hearings REMOTELY using the BlueJeans Video Conferencing system. Department 13 has adopted this policy as a precautionary measure in light of public health concerns for Coronavirus COVID-19, and the Court orders that any party intending to appear before Department 13 for law and motion matters do so by BlueJeans only. As a result, your matter scheduled January 6, 2022 in this case will be conducted via BlueJeans. You have the choice to appear either by phone or computer/video.

Dial the following number: 1-408-419-1715
Meeting ID: 869 862 085
Participant Passcode: 0049
URL: <https://bluejeans.com/869862085/0049>

To connect by phone, dial the number provided and enter the meeting ID followed by #.

To connect by computer if you do NOT have the app, copy the URL link into a web browser. Google Chrome is preferred but not required. Once you are on the BlueJeans website click on Join with Browser which is located on the bottom of the page. Follow the instructions and prompts given by BlueJeans.

You may also download the BlueJeans app and join the meeting by entering the meeting ID.

PLEASE NOTE the following protocol each participant will be required to follow:

You will be automatically muted upon entry to the meeting. Please remain muted while waiting for your matter to be called. If you are connecting by phone, you can mute/unmute yourself on your phone or by pressing *4.

Do NOT place the call on hold since some phones may play wait/hold music.

Please do NOT use speaker phone as it causes a loud echo/ringing noise.

Please state your name each time you speak so that the court recorder can capture a clear record.

Please be mindful of rustling papers, background noise, and coughing or loud breathing.

Please be mindful of where your camera is pointing.

We encourage you to visit the Bluejeans.com website to get familiar with the BlueJeans phone/videoconferencing system before your hearing.

Please be patient if you call in and we are in the middle of oral argument from a previous case. Your case should be called shortly. Again, please keep your phone or computer mic on MUTE until your case is called.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Madalyn Kearney, to all registered parties for Odyssey File & Serve. /mk 1/4/22

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

January 06, 2022

A-17-753532-B Robert Reynolds, Plaintiff(s)
vs.
Raffi Tufenkjian, Defendant(s)

January 06, 2022 9:00 AM All Pending Motions

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 16D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Balducci, Christian T. Attorney

JOURNAL ENTRIES

- DEFENDANTS' MOTION FOR ATTORNEY'S FEES AND COSTS...MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFFS ROBERT G. REYNOLDS AND DIAMANTI FINE JEWELERS LLC

Bradley Marx, Esq. present for Plaintiffs. Counsel present via BlueJeans.

Following arguments by Mr. Balducci and Mr. Marx, COURT ORDERED, Defendants' Motion for Attorney's Fees and Costs UNDER ADVISEMENT. Mr. Balducci advised he had no opposition to the Motion to Withdraw. Cause appearing and there being no opposition, COURT FURTHER ORDERED, Motion to Withdraw as Counsel for Plaintiffs Robert G. Reynolds and Diamanti Fine Jewelers LLC GRANTED. Mr. Marx to prepare the order.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

January 26, 2022

A-17-753532-B	Robert Reynolds, Plaintiff(s)
	vs.
	Raffi Tufenkjian, Defendant(s)

January 26, 2022	9:00 AM	Minute Order
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HEARD BY: Denton, Mark R.

COURTROOM: Chambers

COURT CLERK: Madalyn Kearney

RECORDER:

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- HAVING further reviewed and considered the parties' filings and argument of counsel pertaining to Defendants' Motion for Attorney's Fees and Costs, heard and taken under advisement on January 6, 2022, and being fully advised in the premises, and being unpersuaded by Defendants' offer of judgment contentions, but being persuaded by their contractual contentions, the Court GRANTS Defendants' subject Motion and will award attorneys' fees and costs beyond those previously awarded in the Order of February 14, 2019 for Defendants in the additional sums of \$113,058.00 (fees) and \$7,744.42 (costs). With regard to costs, this ruling is based on Defendants' cost showings, not upon their untimeliness contention. Counsel for Defendants is directed to submit a proposed order consistent herewith and with supportive briefing/argument.

IT IS SO ORDERED.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Madalyn Kearney, to all registered parties for Odyssey File & Serve. /mk 1/26/22

EXHIBIT(S) LIST

Case No.: A753532

Trial Date: 9/21/21

Dept. No.: XIII

Judge: Mark Denton

Plaintiff: Robert Reynolds

Court Clerk: Madalyn Kearney

Recorder: Jennifer Gerold

Counsel for Plaintiff: Bradley Marx

vs.

Defendant: Raffi Tufenkjian

Counsel for Defendant: Christian Balducci

TRIAL BEFORE THE COURT

JOINT EXHIBITS

Exhibit Number	Exhibit Description	Date Offered	Objection	Date Admitted	
J1	DEFTS 000234-000239 Offer to Purchase and Sale of Business Assets with Earnest Money Provision	9/21/21	Stip	9/21/21	WA
J2	DEFTS 000233 Amendment to Purchase Agreement				WA
J3	DEFTS 000418 Personal Financial Statement				WA
J4	DEFTS 000797-000841 Business Opportunity Summary				WA
J5	DEFTS 000200-000201 Certificate of Limited Liability Company Status and Authority of Diamanti Fine Jewelers LLC				WA
J6	DEFTS 000221-000226 Business/Bulk Sale Transfer Instructions (Closing Agreement)				WA
J7	REYNOLDS 000193 Bill of Sale: Jewelers				WA
J8	REYNOLDS 000200-000203 Bill of Sale – Typed				WA
J9	DEFTS 000199 Joint Acknowledgement of Change of Possession				WA
J10	DEFTS 000204 Uniform Commercial Code (U.C.C.) & Federal Tax Lien Document Report				WA
J11	DEFTS 000211-000212 Sales Tax Agreement				WA
J12	DEFTS 000213-000214 State of Nevada Unemployment "DETR" Tax Agreement				WA
J13	DEFTS 000216 Inventory Report Approval and Mutual Understanding				WA
J14	DEFTS 001327-001329 Assignment and Assumption of Retail Lease	9/21/21	Stip	9/21/21	WA

EXHIBIT(S) LIST

Exhibit Number	Exhibit Description	Date Offered	Objection	Date Admitted	
J15	DEFTS 000794-000796 January 5, 2015 Email	9/21/21	Stip	9/21/21	WA
J16	DEFTS 000183-000184 Certificate of Custodian of Records to Accompany Copies of Records Pursuant to NRS 52.260 (Accelerated Law Group, Inc.)				WA
J17	DEFTS 000325-000326 Certificate of Custodian of Records to Accompany Copies of Records Pursuant to NRS 52.260 (Sunbelt Business Brokers)				WA
J18	REYNOLDS000001-62 Tivoli Village Lease				WA
J19	REYNOLDS000063-120 Tivoli Village Retail Restaurant Tenant Criteria Manual				WA
J20	REYNOLDS001829-1832 License Agreement				WA
J21	REYNOLDS001827 Specialty Leasing Merchant Vacating Notice				WA
J22	REYNOLDS001837 Emails				WA
J23	REYNOLDS000132-175 Business Opportunity Summary				WA
J24	REYNOLDS000240-277 Customer List				WA
J25	REYNOLDS000312-340 Inventory				WA
J26	REYNOLDS000215 Allocation of Purchase Price				WA
J27	REYNOLDS000236-238 Assignment and Assumption of Lease				WA
J28	REYNOLDS001778-1825 Item Cost History Report				WA
J29	REYNOLDS000239 Emails				WA
J30	REYNOLDS000344-355 Sales and Use Tax Return				WA
J31	REYNOLDS1844-1842 Diamanti Jewelers Records				WA
J32	DEFTS000609 Emails				WA
J33	DEFTS000346 Emails				WA
J34	DEFTS000349 Emails				WA
J35	DEFTS000567-570 Emails				WA
J36	DEFTS000559 Emails				WA
J37	DEFTS000856 Emails				WA
J38	DEFTS001164-1169 Listing Agreement	9/21/21	Stip	9/21/21	WA



EIGHTH JUDICIAL DISTRICT COURT CLERK'S OFFICE
NOTICE OF DEFICIENCY
ON APPEAL TO NEVADA SUPREME COURT

JOSEPH Z. GERSTEN, ESQ.
9680 W. TROPICANA AVE. #146
LAS VEGAS, NV 89147

DATE: March 18, 2022
CASE: A-17-753532-B

RE CASE: ROBERT G. REYNOLDS; DIAMANTI FINE JEWELERS, LLC vs. RAFFI TUFENKJIAN; LUXURY HOLDINGS LV, LLC

NOTICE OF APPEAL FILED: March 16, 2022

YOUR APPEAL HAS BEEN SENT TO THE SUPREME COURT.

PLEASE NOTE: DOCUMENTS **NOT** TRANSMITTED HAVE BEEN MARKED:

- ☒ \$250 – Supreme Court Filing Fee (Make Check Payable to the Supreme Court)**
 - If the \$250 Supreme Court Filing Fee was not submitted along with the original Notice of Appeal, it must be mailed directly to the Supreme Court. The Supreme Court Filing Fee will not be forwarded by this office if submitted after the Notice of Appeal has been filed.
- ☐ \$24 – District Court Filing Fee (Make Check Payable to the District Court)**
- ☒ \$500 – Cost Bond on Appeal (Make Check Payable to the District Court)**
 - NRAP 7: Bond For Costs On Appeal in Civil Cases
 - *Previously paid Bonds are not transferable between appeals without an order of the District Court.*
- ☒ Case Appeal Statement
 - NRAP 3 (a)(1), Form 2
- ☐ Order
- ☐ Notice of Entry of Order

NEVADA RULES OF APPELLATE PROCEDURE 3 (a) (3) states:

"The district court clerk must file appellant's notice of appeal despite perceived deficiencies in the notice, including the failure to pay the district court or Supreme Court filing fee. **The district court clerk shall apprise appellant of the deficiencies in writing**, and shall transmit the notice of appeal to the Supreme Court in accordance with subdivision (g) of this Rule with a notation to the clerk of the Supreme Court setting forth the deficiencies. Despite any deficiencies in the notice of appeal, the clerk of the Supreme Court shall docket the appeal in accordance with Rule 12."

Please refer to Rule 3 for an explanation of any possible deficiencies.

*****Per District Court Administrative Order 2012-01, in regards to civil litigants, "...all Orders to Appear in Forma Pauperis expire one year from the date of issuance." You must reapply for in Forma Pauperis status.***

Certification of Copy

State of Nevada }
County of Clark } SS:

I, Steven D. Grierson, the Clerk of the Court of the Eighth Judicial District Court, Clark County, State of Nevada, does hereby certify that the foregoing is a true, full and correct copy of the hereinafter stated original document(s):

NOTICE OF APPEAL; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET; ORDER GRANTING DEFENDANTS' MOTION FOR ATTORNEY'S FEES AND COSTS; NOTICE OF ENTRY OF ORDER GRANTING DEFENDANTS' MOTION FOR ATTORNEY'S FEES AND COSTS; DISTRICT COURT MINUTES; EXHIBITS LIST; NOTICE OF DEFICIENCY

ROBERT G. REYNOLDS; DIAMANTI FINE
JEWELERS, LLC,

Plaintiff(s),

vs.

RAFFI TUFENKJIAN; LUXURY HOLDINGS
LV, LLC,

Defendant(s),

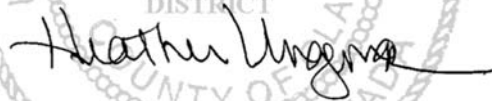
Case No: A-17-753532-B

Dept No: XIII

now on file and of record in this office.

IN WITNESS THEREOF, I have hereunto
Set my hand and Affixed the seal of the
Court at my office, Las Vegas, Nevada
This 18 day of March 2022.

Steven D. Grierson, Clerk of the Court



Heather Ungermann, Deputy Clerk

