CASE NO. 84762

IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed
Sep 30 2022 08:46 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

JOHN DATTALA

Appellant

vs.

PRECISION ASSETS;
ACRY DEVELOPMENT LLC;
WFG NATIONAL TITLE INSURANCE COMPANY

Respondents

JOINT APPENDIX - VOLUME 10

Chronological Order [NRAP 30(c)(1)] Pages 3 - 5

Alphabetical Index [NRAP 30(c)(2)] Pages 6 - 9

Appeal from the Eighth Judicial District Court, Clark County, Nevada

District Court Case # A-19-794335-C

The Honorable District Court Judge Adriana Escobar

BENJAMIN B. CHILDS, ESQ.
Nevada Bar No. 3946
318 S. Maryland Parkway
Las Vegas, Nevada 89101
(702) 385-3865
Attorney for Appellant
JOHN DATTALA

ZACHARY T. BALL, ESQ.
Nevada Bar No. 8364
1935 Village Center Circle # 120
Las Vegas, NV 89134
(702) 303 8600
Attorney for Respondent
PRECISION ASSETS

Docket 84762 Document 2022-30843

JOHN BENEDICT, ESQ.
Nevada Bar No. 5581
2190 E/ Pebble Rd # 260
Las Vegas, NV 89123
(702) 333 3770
Attorney for Respondent
ACRY DEVELOPMENT LLC;

YANXIONG LI, ESQ.
Nevada Bar No. 12807
LUKASZ WOZNIAK,
Nevada Bar No.12138
7785 W. Sahara Ave. # 200
Las Vegas, NV 89117
Attorneys for Respondent
WFG NATIONAL TITLE
INSURANCE COMPANY

Dattala - NSC # 84762
Appendix index

Chronological Order [NRAP 30(c)(1)]

Document	Bates #
VOLUME 1	
Complaint filed 5/7/2019	1 - 13
Bursey Answer filed 5/10/2019	14 - 28
First Amended Complaint filed 7/11/2019	29 - 51
Service of Process - Acry Development filed 7/18/2019	52 - 56
Acceptance of Service - Bursey filed 7/30/2019	57 - 59
Service of Process - WFG file 7/30/2019	60 - 62
Acceptance of Service - Precision Assets and WFG filed 7/30/2019	63 - 67
Service - Spencer filed 8/8/2019	68 - 70
Service - Medina filed 8/20/2019	71 - 73
Answer - Spencer filed 8/23/2019	74 - 77
Answer and Counterclaim - Bursey filed 8/30/2019	78 - 92
Answer - Medina filed 9/5/2019	93 - 105
Answer to Counterclaim - Dattala filed 9/24/2019	106 - 109
Answer and Counterclaim - Precision Assets and WFG filed 3/2/2020	110-129
Answer to Counterclaim - Dattala filed 6/5/2020	130 - 135
Answer and Counterclaim - Acry Development filed 6/19/2020	136 - 141
Stipulation and Order Removing Spencer as a party filed 8/26/2020	142 - 146
Findings of Fact, Conclusions of Law and Judgment [with Notice of Entry] filed 10/15/2020	147 - 154
Cross-claim - Precision Assets vs. WFG filed 11/5/2020	155 - 170
Answer - WFG to cross-claim filed 11/30/2020	171 - 181
Second Amended Complaint [SAC] filed 1/31/2021	182 - 200
Answer to SAC - Medina filed 2/5/2021	201 - 210
Answer to SAC - WFG filed 2/16/2021	211 - 220
Answer to SAC - Acry Development filed 2/19/2021	221 - 225
Answer to SAC - Precision Assets, Cross-claim against Bursey filed 2/22/2021	226 - 241
VOLUME 2	
Amended Answer to SAC - Medina filed 7/20/2021	242 - 252
Motion for Summary Judgment - WFG v. Dattala filed 8/23/2021	253 - 335
Motion to Expunge Deed of Trust - Precision v. Dattala filed 8/23/2021	336 - 492
VOLUME 3	
Motion to Expunge Deed of Trust - Precision v. Dattala filed 8/23/2021	493 - 553

Motion to Expunge Lis Pendens - Precision v. Dattala filed 8/23/2021 554 - 575
Motion for Summary Judgment - Precision v. Dattala filed 8/23/2021 576 - 742

VOLUME 4
Motion for Summary Judgment - Precision v. Dattala filed 8/23/2021 743 - 993

VOLUME 5
Motion for Summary Judgment - Precision v. Dattala filed 8/23/2021 994 - 1084
Joinder to Precision Assets' motions - by Acry Development filed 8/25/2021 1085 - 1087
Joinder to WFG's motions - by Precision Assets filed 8/26/2021 1088 - 1091
Opposition to WFG's Motion for Summary Judgment - Dattala filed 9/13/2021 1092 - 1134
Opposition to Precision Assets' Motion for Summary Judgment - Dattala filed 9/13/2021 1135 - 1244

VOLUME 6
Opposition to Precision Assets' Motion for Summary Judgment - Dattala filed 9/13/2021 1245 - 1384
Opposition to Precision Assets' Motion to Expunge Deed of Trust and Conter- motion - Dattala filed 9/13/2021 1385 - 1393
Reply to Opposition - Precision Assets' Summary Judgment filed 9/21/2021 1394 - 1402
Reply to Opposition - Precision Assets' Motion Expunge Deed of Trust filed 9/21/2021 1403 - 1409
Reply to Opposition - Precision Assets' Motion Expunge Lis Pendens filed 9/21/2021 1410 - 1416
Reply to Opposition to Countermotion - Dattala filed 9/22/2021 1417 - 1438
Motion for Reconsideration (Precision Assets motions) Dattala filed 10/9/2021 1439 - 1495

VOLUME 7
Motion for Reconsideration (Precision Assets motions) Dattala filed 10/9/2021 1496 -1531
Findings of Facts, Conclusions of Law and Judgment - Dattala v. Bursey and Medina [with Notice of Entry] filed 10/15/2021 1532 - 1556
Supplement to Dattala's Motion for Reconsideration filed 10/18/2021 1557 - 1596
Motion for Declaratory Relief - Dattala filed 10/20/2021 1597 - 1677
Order on Plaintiff/Counterdefendant's Motions in Limine [with Notice of Entry] filed 10/21/2021 1678 - 1692
Order on Precision Assets' Motion in Limine No. 4 [with Notice of Entry] filed 10/21/2021 1693 - 1697
Order Granting Precision Assets' Motions for Summary Judgment, to Expunge Deed of Trust and to Expunge Lis Pendens [with Notice of Entry] filed 10/22/2021 [Order being appealed] 1698 - 1712
Opposition to Motion for Reconsideration - Precision Assets filed 10/24/2021 1713 - 1717
Order Granting WFG's Motions for Summary Judgment, [with Notice of Entry] filed 10/25/2021 [Order being appealed] 1718 - 1727

Joinder in Opposition to Motion for Reconsideration - Acry Development and Precision Assets filed 11/4/2021 1728 - 1730

VOLUME 8
Motion for Reconsideration (WFG motions)- Dattala filed 11/8/2021 1731 - 1779
Reply to Opposition - Dattala filed 11/9/2021 1780 - 1797
Opposition to Motion for Reconsideration - WFG filed 11/22/21 1798 - 1804
Joinder in Opposition to Motion for Reconsideration - Acry Development and Precision Assets filed 11/29/2021 1805 - 1806
Reply to Opposition and Joinder - Dattala filed 12/2/2021 1807 - 1813
Declaration of Eustachius Bursey - Dattala filed 12/08/2021 1814 - 1817
Reply to Opposition and Joinder - Dattala filed 1/13/2022 1818 - 1825
Order Denying Motion for Reconsideration [with Notice of Entry] for Dattala's Motion v. WFG, filed 1/31/2022 [Order being appealed] 1826 - 1838
Release of Lis Pendens - Acry Development and Precision Assets filed 2/4/2022 1839 - 1841
Order Denying Motion for Declaratory Relief [with Notice of Entry] filed 2/28/2022. [Order being appealed] 1842 - 1859
Order Denying Motion for Reconsideration [with Notice of Entry] for Dattala's Motion v. Precision Assets filed 5/4/2022 1860 - 1877
Stipulation and Order to Dismiss - WFG and Precision Assets [with Notice of Entry] filed 5/11/2022 1878 - 1886
Notice of Appeal filed May 17, 2022 1887 - 1888
Amendment to Order Granting Defendant's Motion for Summary Judgment, Motion to Expunge Lis Pendens and Motion to Expunge Deed of Trust [with Notice of Entry] filed August 16, 2022 1889 - 1893

VOLUME 9
Transcript of 9/28/2021 hearing 1894 - 1987
Transcript of 11/16/2021 hearing 1988 - 2005
Transcript of 12/16/2021 hearing 2006 - 2020
Transcript of 1/20/2022 hearing 2021 - 2046

VOLUME 10
Transcript of 10/13/2021 hearing 2047 - 2207

Alphabetical Index [NRAP 30(c)(2)]

VOLUME 1

Acceptance of Service - Bursey filed 7/30/2019	57 - 59
Acceptance of Service - Precision Assets and WFG filed 7/30/2019	63 - 67

VOLUME 2

Amended Answer to SAC - Medina filed 7/20/2021	242 - 252

VOLUME 8

Amendment to Order Granting Defendant's Motion for Summary Judgment, Motion to Expunge Lis Pendens and Motion to Expunge Deed of Trust [with Notice of Entry] filed August 16, 2022	1889 - 1893

VOLUME 1

Answer and Counterclaim - Acry Development filed 6/19/2020	136 - 141
Answer and Counterclaim - Bursey filed 8/30/2019	78 - 92
Answer and Counterclaim - Precision Assets and WFG filed 3/2/2020	110-129
Answer - Bursey filed 5/10/2019	14 - 28
Answer - Medina filed 9/5/2019	93 - 105
Answer - Spencer filed 8/23/2019	74 - 77
Answer - WFG to cross-claim filed 11/30/2020	171 - 181
Answer to Counterclaim - Dattala filed 9/24/2019	106 - 109
Answer to Counterclaim - Dattala filed 6/5/2020	130 - 135
Answer to SAC - Medina filed 2/5/2021	201 - 210
Answer to SAC - WFG filed 2/16/2021	211 - 220
Answer to SAC - Acry Development filed 2/19/2021	221 - 225
Answer to SAC - Precision Assets, Cross-claim against Bursey filed 2/22/2021	226 - 241
Complaint filed 5/7/2019	1 - 13
Cross-claim - Precision Assets vs. WFG filed 11/5/2020	155 - 170

VOLUME 8

Declaration of Eustachius Bursey - Dattala filed 12/08/2021	1814 - 1817

VOLUME 1

Findings of Fact, Conclusions of Law and Judgment [with Notice of Entry] filed 10/15/2020	147 - 154

///

VOLUME 7
Findings of Facts, Conclusions of Law and Judgment - Dattala v. Bursey and Medina [with Notice of Entry] filed 10/15/2021 1532 - 1556
Joinder in Opposition to Motion for Reconsideration - Acry Development and Precision Assets filed 11/4/2021 1728 - 1730

VOLUME 8
Joinder in Opposition to Motion for Reconsideration - Acry Development and Precision Assets filed 11/29/2021 1805 - 1806

VOLUME 5
Joinder to Precision Assets' motions - by Acry Development filed 8/25/2021 1085 - 1087
Joinder to WFG's motions - by Precision Assets filed 8/26/2021 1088 - 1091

VOLUME 7
Motion for Declaratory Relief - Dattala filed 10/20/2021 1597 - 1677
Motion for Reconsideration (Precision Assets motions) Dattala filed 10/9/2021 1496 -1531

VOLUME 8
Motion for Reconsideration (WFG motions)- Dattala filed 11/8/2021 1731 - 1779

VOLUMES 3, 4 and 5
Motion for Summary Judgment - Precision v. Dattala filed 8/23/2021 576 - 1084

VOLUME 2
Motion for Summary Judgment - WFG v. Dattala filed 8/23/2021 253 - 335

VOLUMES 2 and 3
Motion to Expunge Deed of Trust - Precision v. Dattala filed 8/23/2021 493 - 553

VOLUME 3
Motion to Expunge Lis Pendens - Precision v. Dattala filed 8/23/2021 554 - 575

VOLUME 8
Opposition to Motion for Reconsideration - WFG filed 11/22/21 1798 - 1804

VOLUME 5
Opposition to Precision Assets' Motion for Summary Judgment - Dattala filed 9/13/2021 1135 - 1244

VOLUME 6
Opposition to Precision Assets' Motion to Expunge Deed of Trust and Conter- motion - Dattala filed 9/13/2021 1385 - 1393

VOLUME 5
Opposition to WFG's Motion for Summary Judgment - Dattala filed 9/13/2021 1092 - 1134

VOLUME 8
Order Denying Motion for Declaratory Relief [with Notice of Entry]
filed 2/28/2022. [Order being appealed] 1842 - 1859
Order Denying Motion for Reconsideration [with Notice of Entry] for Dattala's
Motion v. Precision Assets filed 5/4/2022 1860 - 1877
Order Denying Motion for Reconsideration [with Notice of Entry]
for Dattala's Motion v. WFG, filed 1/31/2022 [Order being appealed] 1826 - 1838

VOLUME 7
Order Granting Precision Assets' Motions for Summary Judgment,
to Expunge Deed of Trust and to Expunge Lis Pendens [with Notice of Entry]
filed 10/22/2021 [Order being appealed] 1698 - 1712
Order Granting WFG's Motions for Summary Judgment, [with Notice of Entry]
filed 10/25/2021 [Order being appealed] 1718 - 1727
Order on Plaintiff/Counterdefendant's Motions in Limine [with Notice of Entry]
filed 10/21/2021 1678 - 1692
Order on Precision Assets' Motion in Limine No. 4 [with Notice of Entry]
filed 10/21/2021 1693 - 1697

VOLUME 8
Release of Lis Pendens - Acry Development and Precision Assets filed 2/4/2022 1839 - 1841
Reply to Opposition and Joinder - Dattala filed 12/2/2021 1807 - 1813

VOLUME 6
Reply to Opposition to Countermotion - Dattala filed 9/22/2021 1417 - 1438
Reply to Opposition - Precision Assets' Motion Expunge Deed of Trust
filed 9/21/2021 1403 - 1409
Reply to Opposition - Precision Assets' Motion Expunge Lis Pendens
filed 9/21/2021 1410 - 1416
Reply to Opposition - Precision Assets' Summary Judgment filed 9/21/2021 1394 - 1402

VOLUME 1
Service of Process - Acry Development filed 7/18/2019 52 - 56
Service of Process- Spencer filed 8/8/2019 68 - 70
Service of Process - Medina filed 8/20/2019 71 - 73
Service of Process - WFG file 7/30/2019 60 - 62
Stipulation and Order Removing Spencer as a party filed 8/26/2020 142 - 146

///

VOLUME 8
Stipulation and Order to Dismiss - WFG and Precision Assets [with Notice of Entry] filed 5/11/2022 1878 - 1886

VOLUME 7
Supplement to Dattala's Motion for Reconsideration filed 10/18/2021 1557 - 1596

VOLUME 9
Transcript of 9/28/2021 hearing 1894 - 1987
Transcript of 11/16/2021 hearing 1988 - 2005
Transcript of 12/16/2021 hearing 2006 - 2020
Transcript of 1/20/2022 hearing 2021 - 2046

VOLUME 10
Transcript of 10/13/2021 hearing 2047 - 2207

Electronically Filed
7/18/2022 9:42 AM
Steven D. Grierson
CLERK OF THE COURT

TRAN

DISTRICT COURT
CLARK COUNTY, NEVADA
* * * * *

JOHN DATTALA,	)	
	)	
Plaintiff,	)	CASE NO. A-19-794335-C
	)	DEPT NO. XIV
vs.	)	
	)	
EUSTACHIUS BURSEY,	)	
	)	**TRANSCRIPT OF PROCEEDINGS**
	)	
Defendant.	)	
	)	
AND RELATED PARTIES	)	

BEFORE THE HONORABLE ADRIANA ESCOBAR, DISTRICT COURT JUDGE

WEDNESDAY, OCTOBER 13, 2021

PROVE-UP HEARING

APPEARANCES:

FOR JOHN DATTALA: BENJAMIN B. CHILDS, ESQ.

FOR WFG NAT'L TITLE INS.: AARON LANCASTER, ESQ.

FOR PRECISION ASSETS: JOHN G. BENEDICT, ESQ.

RECORDED BY: STACEY RAY, COURT RECORDER
TRANSCRIBED BY: JD REPORTING, INC.

LAS VEGAS, CLARK COUNTY, NEVADA, OCTOBER 13, 2021, 11:42 A.M.

*** * * * ***

THE COURT: I'd like your appearances for the record, please. Starting with plaintiff.

MR. CHILDS: Benjamin Childs for the plaintiff, 3946 and my client, John Dattala, is present.

THE COURT: Okay. Good morning, Mr. Childs.

MR. LANCASTER: Aaron Lancaster on behalf of WFG National Title. Bar Number is 10105.

THE COURT: Okay. Good morning, Mr. Lancaster.

MR. LANCASTER: Good morning, Your Honor.

MR. BENEDICT: Good morning, Your Honor. John Benedict, Bar Number 5581. On behalf of Precision Assets as cross-claimant. In court with me as the principal of the business, Avi Segal.

THE COURT: Okay. Good morning --

MR. SEGAL: Morning.

THE COURT: -- Mr. Benedict and good morning, Mr. Segal. Okay. All right.

I sent the jury to lunch because here's what's happening. I was in trial -- I had a calendar yesterday morning and then I was in trial all afternoon on a -- and so I just realized that you've filed this --

Mr. Childs, are you aware of the motion to bifurcate the trial? I have a copy here for you. I realize that there's

1 no time for service but would you like to --
2 MR. CHILDS: No, I have it.
3 THE COURT: You have it?
4 MR. CHILDS: Oh yeah. I have --
5 THE COURT: Okay. Do you waive the service?
6 MR. CHILDS: What's that?
7 THE COURT: Do you waive the service so we can
8 discuss this today or --
9 MR. CHILDS: Absolutely not. I received it. I'm not
10 denying I received it, but I mean if this --
11 THE COURT: Okay. Let's just go one by one; all
12 right?
13 MR. CHILDS: Okay.
14 THE COURT: Okay. So this is -- I have to say this
15 is done on the eve of trial. It's pretty difficult; right?
16 But are you prepared -- oh, one thing I need to tell all of you
17 is when you put the -- when you put it in the orders it doesn't
18 show, necessarily, that it needs to happen right away. So I
19 just want you to be aware of that. So -- and we get -- you can
20 imagine how many orders we get; right? So it's very important
21 that you somehow identify that if you're going to send it to
22 the order email where it's easier to take a look at; okay?
23 Because it's just, like you, everything, it's like a tidal
24 wave; right? Okay. And so that's what I wanted to let you
25 know just for practical purposes in the future.

1 And then, let's see. I realize that it was,
2 Mr. Childs, that it was filed yesterday. We have a jury I sent
3 to lunch because, frankly, I wasn't aware of this order until
4 this morning. We were here until about 10 after or at least I
5 was here until later, but I was working on something else, and
6 of course I would have reviewed this immediately.
7 So I am concerned that Mr. Childs does not have
8 sufficient notice to hear this, technically. I mean, not
9 technically, I mean -- and I've read the motion and I see that,
10 Mr. Childs, your motion for reconsideration is -- and it also
11 discusses that in here.
12 Let's just talk about something that's in this motion
13 for bifurcation but it's also a reality that I -- that we can
14 see. It was set on order shortening time, your motion for
15 reconsideration.
16 MR. CHILDS: No, it wasn't.
17 THE COURT: Okay. I was told that it was. You're
18 saying it was not?
19 MR. CHILDS: It was set on November 15th, and I
20 uploaded an ex parte application and order and CC'd everybody.
21 THE COURT: Okay. All right. So anyway it is set
22 for November 16th.
23 MR. CHILDS: Right.
24 THE COURT: Right? And --
25 MR. CHILDS: But I did upload an application. But I

1 might be able to, perhaps, save everybody --
2 THE COURT: I'm sorry?
3 MR. CHILDS: I can, perhaps, save everybody a little
4 time if you want me to address the Court --
5 THE COURT: If, if what?
6 MR. CHILDS: I think I could save everybody a lot of
7 time if you wanted me to address the Court about this
8 bifurcation.
9 THE COURT: Well, yes, that's the first thing I need
10 to discuss. Thank you for --
11 MR. CHILDS: Sure.
12 THE COURT: -- yes, because of the service issues or
13 the time concerns it's something that I would like to hear from
14 you about; okay?
15 MR. CHILDS: Yeah. So I received it. They -- you
16 can't have a hearing on less than one day's notice. It was
17 1:30 yesterday afternoon, but here's where I'm at.
18 THE COURT: Okay.
19 MR. CHILDS: We are here for trial, my client and I.
20 THE COURT: Yes.
21 MR. CHILDS: We only have two defendants left after
22 these summary judgment motions which there aren't orders on it.
23 I have a motion for reconsideration. I got that, but my two
24 defendants aren't here.
25 THE COURT: Okay.

1 MR. CHILDS: And so I'm wondering, I guess, it's up
2 to the Court how the Court wants to proceed because it seems
3 like it's not going to be a very difficult case for my client
4 and there are notice issues especially with Lillian Medina
5 because she's represented by an attorney who has not withdrawn.
6 So in order for me to seek a default, I have to
7 comply with the local ethical ruling; I think it's 3.5RPC, I
8 think it's 3.5. Give him seven-days notice of intent to seek
9 default before I do that. Then seek the default. Then have a
10 motion on my motion to seek the default and I'll just -- it's a
11 time -- it's a much more cumbersome process than the Court, I
12 believe, doesn't have those ethical issues.
13 THE COURT: I'm sorry?
14 MR. CHILDS: I believe the Court doesn't have those
15 ethical issues of requiring notice about a default. They're
16 not here, and I don't have the rule memorized. It's EDR --
17 EDCR 6. -- strike that -- 2.67 and I believe 2.69. Perhaps the
18 clerk will look it up, but if they don't -- they didn't show
19 up -- they didn't file a pretrial -- this is addressed in
20 that --
21 THE COURT: Go ahead.
22 MR. CHILDS: -- this is addressed in their
23 bifurcation motion, I believe.
24 THE COURT: I don't -- okay. I may have missed it.
25 MR. CHILDS: That the other -- that these two

1 defendants are not participating, have never participated and
2 these are Eustachius Bursey and Lillian Medina. And Lillian
3 Medina is represented by an attorney, Joel Hansen. But they
4 haven't done anything in months. They didn't file it. They
5 didn't participate -- well, actually, I talked to Joel Hansen
6 before I -- for the 2.67 meeting, but he didn't file a pretrial
7 memo, didn't join in our pretrial memos, didn't show up at
8 calendar call. And here we are and they're not here.
9 And so I believe the Court could simply strike
10 Lillian Medina's answer for non -- you know, under these local
11 rules that I cited, I think it's 2.67, 2.69. They're not here,
12 and as far as Mr. -- and as far as Mr. Bursey goes I have a
13 motion in limine that was granted where all of his factual
14 assertions which I have a proposed --
15 THE COURT: Go on.
16 MR. CHILDS: Go ahead and take your time, Judge. If
17 you need to look --
18 THE COURT: No, no, go on. Go on.
19 MR. CHILDS: I have a proposed jury instruction based
20 on the motion in limine that Mr. Bursey's never responded to
21 certain allegations in the complaint. And so those are facts.
22 So that's -- I have a proposed jury instruction, but I don't
23 know we really need to go that far because I think the Court
24 can just accept that those are facts. There's no need to have
25 a trial.

1 And now, again, I don't have a default order about
2 Medina, but the same the process could happen is her answer's
3 stricken for nonparticipation. We're here at trial, and then I
4 could just essentially do a prove-up because those are all
5 facts. All the allegations that are unopposed against Medina
6 and Bursey are facts. And so that pretty much resolves my
7 client's case, and then they can go forward or whatever
8 happens, but if my client has to go forward, we're not
9 stipulating to bifurcate. And I've discussed it with my
10 client; he's here. You can query him if you want.
11 THE COURT: No, no. Good morning.
12 UNIDENTIFIED SPEAKER: Hi.
13 THE COURT: Okay.
14 MR. LANCASTER: Thank you, Your Honor.
15 THE COURT: Yes, Counsel?
16 MR. LANCASTER: Couple of points that I wanted to
17 make that were identified but wanted to reemphasize is that the
18 Court knows how these issues are complex issues, and they're
19 confusing, to be honest. And you look at the claims related to
20 plaintiff's remaining claims and Precision's cross-claims,
21 they're all separate.
22 Our concern is that if we start trial and plaintiff's
23 allowed to make opening statements, the Court reads the
24 plaintiff's complaint to the jury and the plaintiff moves
25 forward to try to prove-up damages that it's going to really

1 confuse the jury as to what our issues are.
2 We believe our issues are complex enough, but adding
3 in these additional claims and additional parties we think that
4 it would be prejudicial especially if all of these facts that
5 are in plaintiff's complaint are deemed admitted and the jury
6 hears those and then how is the jury going to separate, well,
7 those facts are deemed admitted for him but maybe not against
8 us because they do linger and mesh between each other.
9 They talk about, you know, Precision's knowledge,
10 what WFG did. So if the jury hears that these facts are
11 admitted for one person, one plaintiff and not the others, we
12 think that's very prejudicial and very difficult and probably
13 impossible for the jury to try to distinguish and decipher
14 between those two.
15 The other issue I wanted to bring up is that WFG and
16 Precision were progressing and settlement looked very
17 reasonable. And up until -- we were moving in that direction
18 until the motion for reconsideration was filed because what
19 that does is brings back in to the title of the property those
20 issues. And because those issues are still lingering and
21 they're outside -- outstanding, it's difficult to be able to
22 formulate settlement discussions.
23 And so we would -- we would request that, you know,
24 if we're allowed to bifurcate, separate, allow that the motion
25 for reconsideration to be heard and determined; one, we think

that there's a reasonable chance that settlement would be achieved and if not, then the issues would be separated, and they would be a lot more manageable for the jury to handle.

THE COURT: Thank you.

MR. LANCASTER: Thank you.

THE COURT: Mr. Benedict.

MR. BENEDICT: Your Honor, a couple of things. First of all --

THE COURT: I just want you to speak a little bit louder, closer to the mic, please. Thank you.

MR. BENEDICT: Okay. Sure. First of all, you know as an officer of the court that I'm very cognizant of the Court's hard work and schedule. And so this coming at the last minute, I want to put some context on that.

These issues really started to really take light after you granted summary judgment motions, which we don't have even a final order on at this point.

Secondly, I don't just file motions. We had discussions with Mr. Childs about the very things that he just raised in court and getting those, kind of, out of the way in terms of his claims versus Mr. Bursey, his claims versus Ms. Medina. He's entitled to handle his case as he sees fit, but we did discuss those things.

Similarly, we did circulate what you now have in front of you as a joint motion, we did circulate it as a

1 proposed stipulation. And no one has to stipulate to anything,
2 and Mr. Childs chose not to, but that's what impacted the
3 timing. So that I want to put into context that we understand
4 the preparation. I also want you to know that we've been
5 preparing very hard for this trial. It's not as if -- it's not
6 as if this just came up and, you know, we don't want to go to
7 trial.
8 As an officer of the court, I'm here to tell you that
9 we've made significant progress. I echo what Mr. Lancaster
10 says. We've made significant process -- progress; however, the
11 issues are still not finalized. As you know, you don't have a
12 summary judgment order in with findings of fact and conclusions
13 of law.
14 There's now a motion for reconsideration pending.
15 There's no, you know, final orders although they've been
16 circulated in both instances on the motion in limines -- the
17 motions in limine.
18 And so practically speaking, we had asked to be
19 pushed to the court stack on February 7th for the purpose of to
20 allow whatever Mr. Childs is going to do to be done. So that
21 if we're unable to settle, and I really significantly believe
22 we are going to be able to settle, then at least the issues are
23 crystalized and narrowed. And one of my points for the joint
24 motion was, you know, the original trial estimate was 7 to 10
25 days and then we talked about 6 to 8 days.

1 THE COURT: I saw that in your emails.
2 MR. BENEDICT: With the Dattala issues resolved, I
3 believe that we could probably do this in 4 to 5 days with jury
4 selection. Do you agree with that?
5 MR. LANCASTER: Yes.
6 MR. BENEDICT: So we're actually -- I'm cognizant of,
7 you know, judicial resources as well, but I think it works out
8 to be the same amount of court time that we would need
9 ultimately and actually less so.
10 And then the third point is Mr. Lancaster highlighted
11 the difficulty. Frankly, I don't even like sitting on this
12 side of the court room. We're talking about practical things
13 like splitting up peremptory challenges when we're adverse to
14 one another. And we're talking about practical things about,
15 you know, the admissibility of Mr. Childs' proposed evidence
16 and one indication he said, well, you guys don't have -- we
17 don't have any claims against you, WFG or Precision Assets, you
18 can't object.
19 So I'm very concerned that there would be, not on
20 purpose, but invited error to the Court to have these kinds of,
21 you know, facts come in, exhibits come in and then hoping at
22 the end that the jury is able to ferret everything out. And
23 based upon Rule 42 where the Court has discretion can grant a
24 motion for, you know, to save prejudice, to save duplication
25 and when the issues are clearly separate as they are here.

1 Once upon a time, as of September 28th, they were not
2 because the title to the properties were all up in the air, and
3 we were going to have to go through all of this in order to be
4 able to determine that and that changed. And we started trying
5 to resolve it between WFG and Precision at that time. We
6 worked diligently to get everything ready for trial so that we
7 could be prepared, but I think the judicial economy of it, the
8 Court's time, the party's resources are better served,
9 respectfully, if we're able to sever out the cross-claim by
10 Precision Assets versus WFG and reset it for the September 7th
11 stack.
12 If there's any questions, I'd be happy to answer them
13 for the Court.
14 THE COURT: Did you say -- I thought the request was
15 February?
16 MR. BENEDICT: I probably just misspoke.
17 THE COURT: That's okay.
18 MR. BENEDICT: February 7, 2022. Thank you.
19 THE COURT: Okay. Mr. Childs.
20 MR. CHILDS: Well, now we -- are we discussing the
21 motion for reconsideration? It certainly has come up and
22 Mr. Ball's not here. But you're -- they're exactly right. The
23 title to the property is back in -- I don't even think it's an
24 admitted fact now, and I'm just looking at page 13 of the --
25 THE COURT: I must tell you that I'm having -- this

is not usually how my cases work out. I think this -- the responsibility is completely mine, but it's been very difficult trying to --

MR. CHILDS: It's a complicated case.

THE COURT: -- have many balls -- this case. And then having issue -- not the same situation with other cases but other situations; okay? It's just very -- it's been very difficult. I try -- we try -- I have a great team, and we're very dedicated, all of us, but it's very hard -- I may not need to say that as a Judge, but I'm just being -- I'm very frank. That's my personality.

I cut you off, Mr. Childs, forgive me. So what are your thoughts?

MR. CHILDS: I apologize for interrupting. I'm just --

THE COURT: No. No.

MR. CHILDS: -- empathizing with it's a complicated case.

THE COURT: It's very --

MR. CHILDS: I think everybody including the clerks in this room --

THE COURT: Right.

MR. CHILDS: -- will stipulate to that. That's one thing we can all agree on. There's a lot of moving parts that affect other --

1 THE COURT: I see that.
2 MR. CHILDS: -- moving parts. I agree with that.
3 But yeah, the title's back in dispute, and again these statutes
4 that I cited are -- once it's -- there's a fraudulent deed and
5 the chain of title, all purchasers are subject. Every -- I'm
6 just reading the statute from page 2 of my motion, and I
7 don't -- again, I'm just pointing out Mr. Ball isn't here.
8 So --
9 THE COURT: Is there a reason why Mr. Ball -- does
10 anyone have a --
11 MR. CHILDS: Because he had summary judgment granted
12 so he --
13 THE COURT: Oh, that's right, that's right.
14 MR. CHILDS: -- thinks he's not participating.
15 THE COURT: Okay.
16 MR. CHILDS: Every conveyance, charge, instrument
17 declared to be void by the provisions of this chapter, and this
18 is Chapter 111, as against purchasers, shall be equally void
19 against the heirs, successors, personal representatives or
20 assigns of such purchasers.
21 THE COURT: And you are -- let me just make sure I
22 have my notes right. Your motion -- we don't have a motion yet
23 on the decision on the motion for summary judgment. We don't
24 have an order yet; right?
25 MR. CHILDS: No, they circulated it.

1 THE COURT: Okay. But I don't -- I don't -- I
2 haven't reviewed it. I haven't signed it. If I have it, I'm
3 not aware; okay? And then your motion for reconsideration on
4 that -- on that, which I don't have an order for yet, is on
5 November 16th. That's the date right now that it's on
6 calendar.
7 MR. CHILDS: I know, I found it, literally, the next
8 day after I got the --
9 THE COURT: Right. I think too one of them was sent
10 back. I don't know which one it was, but that's something that
11 we can -- we can get over if we work at. So let -- I think we
12 should work together. I have to be very honest with you given
13 the issue of how late this is, my instinct -- my first thought
14 was I'm not going to grant this. This is on the eve of trial,
15 but it's a very complicated case. You are correct. And so --
16 I know you've objected to the bifurcation. Do you still object
17 to it or?
18 MR. CHILDS: Yes, absolutely, I object to that.
19 THE COURT: Okay.
20 MR. CHILDS: Well, I've discussed -- yes, I object to
21 it. I've discussed it extensively with my client for about an
22 hour yesterday.
23 THE COURT: Okay.
24 MR. CHILDS: And we object to it.
25 THE COURT: All right. And then --

1 MR. CHILDS: But if I could finish?
2 THE COURT: I'm sorry?
3 MR. CHILDS: I had a very brief -- I was getting to
4 the punch line.
5 THE COURT: Oh, go ahead. I'm sorry. Go ahead.
6 MR. CHILDS: Okay. The punch line is that --
7 THE COURT: You can remember and, you know, it's been
8 fine for nine years but sometimes having, like, 1300 cases --
9 MR. CHILDS: I know.
10 THE COURT: -- is a little bit difficult; right?
11 Because each one has different issues and so forth.
12 MR. CHILDS: Well, this case is like five cases. I
13 mean --
14 THE COURT: I agree. I agree with you.
15 MR. CHILDS: Yeah, it's --
16 THE COURT: I think we all agree with you.
17 MR. CHILDS: -- it's a law school exam without an
18 answer.
19 THE COURT: Right. Okay.
20 MR. CHILDS: So the punch line is that because if the
21 Burseys hadn't filed an answer that all these facts are now
22 admitted including Dattala was tricked and defrauded into
23 signing the quick claim deed for 59 Sacramento. I'm just
24 reading from my motion on -- and this is a quote from my --
25 THE COURT: Is that the one that you filed that's

1 supposed to be heard on the 23rd?
2 MR. CHILDS: Yes.
3 THE COURT: Okay.
4 MR. CHILDS: No, it's supposedly following the
5 November 15th or 16th. I filed it immediately after the --
6 THE COURT: No, no, no, it's on calendar right now
7 for some time in -- November 16th.
8 MR. CHILDS: Yeah.
9 THE COURT: Okay. Thank you.
10 MR. CHILDS: But I'm just quoting from my second
11 amended complaint and that they -- they conspired to obtain
12 the -- making false representations about the title of 59
13 Sacramento. And then paragraph 27, 28, this is just from my
14 second amended complaint.
15 THE COURT: Right. I have that but go on.
16 MR. CHILDS: Yeah, the fact -- well, I quoted it in
17 my motion. Bursey fraudulently recorded the quick claim deed.
18 And the deed of reconveyance in an attempt to obtain record
19 title to 50 Sacramento by attaching a signature page from
20 another document to those documents. That's an admitted fact.
21 So that's the punch line that they're right and here's the
22 thing.
23 My big concern was there's a final judgment that I
24 believe, and, frankly, I didn't look at the email very closely
25 about 54B certification for the Precision Assets summary

1 judgment orders. Whether I have to, if I appeal it, get a
2 stay. My client can't afford a stay. But guess what? I don't
3 need a stay at all because of these statutes. They prevail.
4 It's on appeal. They're perfectly aware of the issues, and if
5 it's remanded on appeal and I think it should be now because of
6 these findings, the current owner's going to be subject to this
7 new quiet title issue if they're willing to ensure over it,
8 we're going to be back here again.
9 They're aware, Mr. Segal, title company, if they go
10 to another title company and sell it they're all aware that the
11 subsequent purchaser is subject to this void deed in the chain
12 of title. So I don't need a stay. So I think it would be --
13 I'd like my, of course, I like me -- I like my
14 suggestion of if we can just get Medina and Bursey resolved
15 today as far as my client then they can go forward. So they
16 don't have to wait till February. But if we're not going to
17 resolve my client as to the two remaining defendants and then
18 this Precision Assets issue would have to be hashed out.
19 Mr. Ball certainly is entitled to file an opposition on me
20 because this is for Precision Assets, Mr. Benedict, I'm sorry
21 for pointing, Mr. Benedict doesn't represent Precision Assets
22 as the defendant.
23 THE COURT: Right.
24 MR. CHILDS: Yeah, he only represents them as the
25 cross-claimant. So Mr. Ball should have an opportunity to

1 weigh in. I filed it immediately on an order shortening time
2 hoping there could be a hearing before Monday, but here we are
3 on Wednesday, and I'm doing the best I can. I mean --
4 THE COURT: I understand. I think we all are.
5 MR. CHILDS: Yeah. And I -- and so anyway, that's
6 really all I have to say unless you have specific questions
7 because it seems like we could resolve Dattala as far as the
8 two defendants today and they could go forward. And if not,
9 then we can all go forward.
10 THE COURT: Any thoughts on that, Counsel?
11 MR. CHILDS: Because their thing is bifurcation, not
12 eliminating my client's trial today.
13 THE COURT: I'm sorry? Yes.
14 MR. CHILDS: Yeah.
15 MR. LANCASTER: Right. And so I think Mr. Childs
16 points to the complexity and what he's going to talk to the
17 jury about, and to kind of emphasize on a couple of points. If
18 the jury hears that all of these facts are deemed admitted, how
19 are we supposed to be able to bring up our claims and our --
20 and our evidence and not have that be completely confusing to
21 everybody involved? It's impossible.
22 THE COURT: Frankly, it's a little bit confusing to
23 me.
24 MR. LANCASTER: It's impossible. And we've been
25 practicing --

1 THE COURT: I've got it, but still, it's very -- it
2 is very complex.
3 MR. LANCASTER: It is, and that's even when you're
4 not dealing with facts admitted. If the jury hears these facts
5 are admitted and then we discuss things that are differently
6 because they're not admitted as to our individual clients,
7 that's impossible for them to have a dividing line and try to
8 separate those issues.
9 And then going back to the fact that the motion for
10 reconsideration, as Mr. Childs points out, it regurgitates all
11 of the issues related to the title of the properties. And
12 that's the linchpin for WFG and Precision to continue moving
13 forward on settlement. And we're very cognizant of the Court's
14 judicial resources, and we believe that there's a very good
15 shot that it would be resolved, and it would say those things
16 if we were able to move past these issues related to the title.
17 And as soon as those are clarified, we can go back and
18 hopefully finalize settlement, and if Mr. Childs goes up on
19 appeal then, you know, those issues are the only thing
20 remaining, and we still try to clear the Court's docket
21 according to the party's interest and the understanding that
22 title, in this court, has been determined.
23 THE COURT: Mr. Benedict?
24 MR. BENEDICT: May I add something quickly?
25 It seems, you know, the Court suggested, perhaps,

1 that we could work together, all parties in the court. And I
2 think I'm hearing the framework for that to happen. Mr. Childs
3 is correct that we're not here objecting to his client's right
4 to move forward against Bursey or Medina.
5 What we would like is some certainty and some timing
6 parameters. And so with a hearing already set for the 16th,
7 and I do want to be clear, I don't represent Precision in
8 response to the summary judgment motion at all nor will I
9 represent --
10 THE COURT: It's Mr. Ball.
11 MR. BENEDICT: Mr. Ball and, you know, those deed
12 issues and the statutes that Mr. Childs is reading to the Court
13 have already been briefed extensively, and I think the oral
14 argument approached, I don't know, three hours or two and a
15 half hours. So they've been thoroughly vetted.
16 But perhaps a workable situation would be to get
17 agreement from Mr. Childs to the severance and to go ahead and
18 strike Mr. Bursey -- Mr. Bursey's -- he didn't answer, but to
19 enter default and to strike Ms. Medina's answer with an idea
20 that he'll do the prove-up, you know, or as soon as he can but
21 preferably around that November 16th timeframe. Because then
22 we have finality one way or the other, and WFG and Precision
23 will be able to work out their issues subject only to, you
24 know, possible appeal.
25 THE COURT: Okay. So Mr. Childs has made a motion

1 under -- excuse me, NRCP 16 and 37 for failure to appear and
2 EDCR 2.67 and 2.69 which, you know, this Court has the ability
3 to default the parties as to the situation and that's your --
4 actually, your suggestion.
5 MR. BENEDICT: I would suggest that if that were
6 granted then the severance would be -- would make perfect --
7 THE COURT: Would make sense.
8 MR. BENEDICT: -- perfectly logical sense at that
9 point.
10 THE COURT: Right. Mr. -- I'm sorry --
11 MR. LANCASTER: Lancaster.
12 THE COURT: -- Lancaster, forgive me.
13 MR. LANCASTER: You're good, Your Honor.
14 THE COURT: Mr. Lancaster.
15 MR. LANCASTER: I agree with everything that
16 Mr. Benedict has said. The finality of the Court's decision
17 regarding title here really is critical for our claims, WFG's
18 and Precision's, to be able to be handled and resolved.
19 THE COURT: Okay. Mr. Childs?
20 MR. CHILDS: This is exactly what my client and I are
21 emphatically opposed to. If we're going to -- if we're going
22 to enter default or strike -- we don't have to strike the
23 answer for Bursey; that's dealt with on motion in limine.
24 If --
25 THE COURT: That what? Forgive me.

1 MR. CHILDS: That's dealt with on the -- that was
2 dealt with an order on my motion in limine.
3 THE COURT: Okay.
4 MR. CHILDS: And then Medina I didn't because she has
5 an attorney. And so if we -- if the Court strikes her answer,
6 we're not -- we're totally opposed to continue anything. We
7 are here today. We can do the prove-up. You don't have to
8 call a jury in. He's here. He can testify. They can go
9 forward with their trial. I don't see how that that's not the
10 most efficient way to -- that's not the most efficient way
11 because there's only two defendants that my client has that
12 aren't here.
13 So if they're resolved, and I don't agree to
14 something in the future -- doing something in the future. My
15 client's here today. He can barely walk, Judge. We were, I
16 don't know, five minutes late but just because Ben was
17 stressing out at his office when he can't even walk to his car
18 to get here. So he -- I said, you crawl. Don't walk, crawl.
19 Do whatever you got to do because we're not continuing anything
20 else.
21 And so coming back is unnecessary. He's here,
22 they're not. There's a second amended complaint with
23 allegations with numbers in it that my client could testify to,
24 and I don't even think that's necessary because the second
25 amended complaint is a filed document that I can prove up. And

1 then they can go forward. I'm not agreeing to anything where,
2 okay, come back in November. Because I know how things go.
3 And then something -- and then it's like okay, Mr. Childs, now
4 your trial's going to start in February or oh, we're busy then
5 so now it's going to be in May.
6 And Mr. Ball's not here. There's no written order.
7 And he had notice of this motion so I'm completely opposed.
8 THE COURT: Well, actually, I didn't know that this
9 motion was on until this morning. I mean, we're not -- it's
10 not -- I didn't know it was filed; okay.
11 MR. CHILDS: Yeah, I understood.
12 THE COURT: Right.
13 MR. CHILDS: So we're completely opposed to anything
14 in the future. He's here and he can -- we can get testimony if
15 it's even necessary. I, personally, don't think it's
16 necessary. There's a complaint that -- that was admitted. And
17 then they can continue. They're all here ready to go too. I
18 mean, that's -- I'm opposed to the continuance thing of come
19 back later and prove it up after November 15th.
20 THE COURT: Right.
21 MR. BENEDICT: Your Honor, that was just a
22 suggestion. If the Court -- the Court's going to make the
23 decision on what it wants to do with Mr. Dattala's case. We
24 don't object to you taking your actions on the local rules and
25 your scheduling order as against Mr. Bursey and against

1 Ms. Medina. If that -- if you want to do as a prove-up today
2 that's the Court's pleasure then we have no objection to that.
3 But then Mr. Childs would be out of it, and it would
4 be in the Court's discretion to allow us to move the trial to
5 February because we're still dealing with the titles and the
6 property and the motion for reconsideration which cannot be
7 advanced today because it hasn't been opposed.
8 MR. CHILDS: And I wouldn't, of course, I wouldn't
9 oppose that because then my -- if my client's out then they
10 can --
11 THE COURT: That it makes sense; doesn't it?
12 MR. CHILDS: -- they can do whatever they want to do.
13 So problem solved. There you go.
14 THE COURT: Okay.
15 MR. CHILDS: We all worked together.
16 THE COURT: All right. So you stipulate to that?
17 MR. CHILDS: As long as we can do the prove-up --
18 THE COURT: Mr. Childs.
19 MR. CHILDS: -- today and get the -- get some numbers
20 in that I can submit a judgment on then, yes. Of course, I
21 don't oppose anything once my client's out.
22 THE COURT: Okay.
23 MR. CHILDS: As far as the two defendants.
24 THE COURT: And --
25 MR. CHILDS: Because that he -- because he signed --

1 THE COURT: Mr. Bursey and Ms. Medina?
2 MR. CHILDS: Yes. Because he's not involved with
3 their case. Other than --
4 THE COURT: Who's he?
5 MR. CHILDS: -- if you want him to think --
6 THE COURT: Who are you talking about?
7 MR. CHILDS: -- they want him to be a witness and, of
8 course, he's --
9 THE COURT: Who are you talking about? He?
10 MR. CHILDS: The WFG and Precision, those two.
11 THE COURT: Okay. Right.
12 MR. CHILDS: It's a somewhat of a separate case but
13 it's inside this case.
14 THE COURT: Yes, I know.
15 MR. CHILDS: And they want him to come back and he's
16 local. I will try to get him back here to -- if they need him
17 to testify at their trial.
18 THE COURT: Okay.
19 MR. BENEDICT: I would suggest to the Court that with
20 Mr. Childs' stipulation that would -- that would resolve it.
21 He does his prove-up today. The Court has discretion to move
22 ours to the February stack. And it's everything is pending on
23 the motion for reconsideration, November 16th.
24 THE COURT: Stipulated to, Mr. Childs?
25 MR. CHILDS: Sure if we can get the final -- an order

1 that I can submit a written order on today.
2 MR. LANCASTER: Yes, Your Honor.
3 THE COURT: Okay.
4 MR. LANCASTER: Your Honor, stipulated.
5 THE COURT: All right. So I have a stipulation from
6 all three counsel, Mr. Childs, Mr. Lancaster and Mr. Benedict.
7 All right. So at -- it's very nice that you're all working
8 together. This is kind of a unique situation. All right.
9 MR. BENEDICT: And we appreciate the juggling act you
10 have to do, Judge.
11 THE COURT: Okay. So pursuant to Mr. Childs' motion
12 for default of Mr. Bursey and Ms. Medina and also Mr. Benedict
13 and Mr. Armstrong --
14 MR. LANCASTER: Lancaster.
15 THE COURT: Forgive me. Forgive me. I'm so sorry.
16 MR. LANCASTER: I like the compliments though.
17 THE COURT: Okay. Mr. Lancaster. Mr. Childs?
18 MR. CHILDS: I'd like to be clear for ethical reasons
19 that I don't want to make a motion to enter default against
20 Medina because then I'm required to give Mr. --
21 THE COURT: All right.
22 MR. CHILDS: -- Hansen -- the Court can do it. I
23 don't think the Court has the same ethical --
24 THE COURT: Oh, okay. Wait a second though. I have
25 a stipulation that -- let's back up a little bit.

1 Mr. Benedict, Mr. Lancaster and Mr. Childs, do you
2 stipulate to, especially, Mr. Benedict and Mr. Lancaster, with
3 respect to this issue for this Court to default Mr. Bursey and
4 Ms. Medina?
5 MR. LANCASTER: Yes, Your Honor.
6 MR. BENEDICT: Your Honor, I think what Mr. Childs is
7 just bringing up a technical issue --
8 THE COURT: Right.
9 MR. BENEDICT: -- so that the Court will be fully
10 educated on it. He, if I understand correctly --
11 MR. CHILDS: Thank you, yes. Please give it a shot.
12 MR. BENEDICT: -- if I understand correctly, he has a
13 motion in limine already granted against Mr. Bursey.
14 Mr. Bursey has never answered in this -- in this proceeding.
15 So I think he's drawing a distinction between striking and
16 answering and defaulting someone versus allowing him to go with
17 a default prove-up based upon his motion in limine.
18 MR. CHILDS: Plus, Medina's represented by an
19 attorney. That's my point.
20 THE COURT: Understood.
21 MR. BENEDICT: So it'd have to be not by the
22 stipulation of the parties, but by the Court --
23 THE COURT: Thank you.
24 MR. BENEDICT: -- first making a ruling on the 267
25 and 269 which I think the Court is well within its --

1 MR. CHILDS: Yeah, don't put me in the middle there.
2 THE COURT: Thank you. I understood. All right.
3 So pursuant to EDCR 267 and 269, this Court defaults
4 with respect to this issue, the issues with plaintiff
5 Mr. Childs -- I can't believe I'm short of words here.
6 MR. CHILDS: Don't say it.
7 THE COURT: Mr. Childs' client -- case, and we will
8 move forward on a prove-up hearing; okay? So that -- that is
9 done. All right.
10 I just need to take a break and make sure -- just
11 like a five minute break to make sure I'm doing everything
12 right here. And so --
13 MR. CHILDS: If you want to check the ethical rule,
14 it's -- I think it's 3.5. It's a local Nevada -- it's a Nevada
15 specific rule that I'm not --
16 MR. BENEDICT: It is, that's the rule.
17 THE COURT: Okay. I'm just going to take a 10
18 minute --
19 MR. CHILDS: Thank you.
20 THE COURT: -- recess so that I can make sure that --
21 I think we're on the right track. I know that you're all very
22 well educated in this. Frankly, I haven't read the -- I
23 haven't had a chance to read and really think about this until
24 now, but I do like it that we're all working together, and it
25 sounds like it's a plan.

1 Jerry, when is the jury coming back?
2 THE MARSHAL: They're due back 12:34, 12:45 start.
3 THE COURT: Okay. So we would not need a jury today;
4 correct?
5 MR. LANCASTER: Correct, Your Honor.
6 THE COURT: Mr. Childs?
7 MR. CHILDS: Assuming this is implicated --
8 THE COURT: Yes, yes. Correct?
9 MR. CHILDS: Correct.
10 THE COURT: Okay. I just want to make sure. All
11 right. And then we'll -- I will let you know.
12 THE MARSHAL: Okay.
13 THE COURT: I just want to make sure I have all my
14 ducks in order.
15 THE MARSHAL: No problem.
16 THE COURT: So that -- all right. Okay. I'll be
17 right back.
18 (Court recessed 12:22 p.m., until 12:34 p.m.)
19 THE COURT: All right. Pursuant to EDCR 2.6 and
20 2.69, this Court enters default against Mr. Bursey and
21 Ms. Medina. This is a default judgment, and there'll be a
22 prove-up that follows; okay?
23 We are not going to need the jury today. So before I
24 let them go, I'm going to set you for trial right now because I
25 don't want -- you're going to have an opportunity to -- for me

1 to hear -- for me to see an order, first of all.
2 And I believe you have a motion for the
3 reconsideration, Mr. Childs?
4 MR. CHILDS: Yeah. I'd say just leave it on till
5 November 15th.
6 THE COURT: Okay. That's why this is going to
7 February --
8 MR. CHILDS: Given the current --
9 THE COURT: -- otherwise I'd bring them sooner, but I
10 think it's good. All right. My trial stack starts on February
11 7th, Counsel, and that's a Monday and of 2022 to be clear. And
12 your calendar call will be held on January 20th 2, 0, at 2:00
13 p.m. You need to be ready to go to trial that day; okay? All
14 right. And then in the meantime, the motion practice will
15 occur.
16 Jerry?
17 THE MARSHAL: Yes, Your Honor.
18 THE COURT: Will you please ask Jill to inform Mariah
19 from the jury and you can take them now and escort them there.
20 We're not going to need their services. There's been a default
21 judgment entered against and we're not --
22 THE MARSHAL: Why don't we just let --
23 THE COURT: Pardon?
24 THE MARSHAL: Why don't we just release them?
25 THE COURT: Yes, but -- oh, Jill's going to talk to

1 you --
2 THE MARSHAL: Okay.
3 THE COURT: So you can just release them.
4 THE MARSHAL: Okay.
5 THE COURT: Thank you. All right.
6 So let's talk about the default -- the prove-up
7 hearing. Is that something that you're ready to proceed with
8 now?
9 MR. CHILDS: Absolutely.
10 THE COURT: Would you like an hour break for lunch?
11 MR. CHILDS: No, I don't think they're --
12 MR. BENEDICT: Your Honor, as a cross-claimant with
13 respect to the Court, I would not participate in that, I
14 wouldn't.
15 THE COURT: Okay.
16 MR. LANCASTER: Same as a defendant and a
17 cross-claimant defendant --
18 THE COURT: That's right. That's right. Okay.
19 Thank you. I have you all in front of me so it's -- all right.
20 Mr. Childs, let's do it.
21 MR. CHILDS: Okay. Well, now I might have to come up
22 to the podium.
23 THE COURT: Okay.
24 MR. CHILDS: Can I call my --
25 THE COURT: Have a great day, Counsel.

1 MR. LANCASTER: Thank you, Judge.
2 MR. BENEDICT: Thank you, Your Honor.
3 THE COURT: I want to thank you for all working
4 together on this; okay?
5 MR. CHILDS: Oh, believe it or not, we actually --
6 well, I don't know. I'm speaking for myself, I don't feel any
7 animosity to the other attorneys. I mean, it's just --
8 THE COURT: No.
9 MR. CHILDS: -- it's a high emotion case --
10 THE COURT: Understood.
11 MR. CHILDS: -- with a lot of moving parts, but --
12 MR. LANCASTER: (indiscernible) and I'd like to thank
13 the Court and its staff has been very accommodating for all the
14 moving pieces in this trial so I appreciate it.
15 THE COURT: You're welcome and it is very -- it's
16 just been very difficult with all of the -- all of the other
17 cases. It's just been amazing.
18 MR. LANCASTER: Understood.
19 THE COURT: So I'm very happy that you've worked
20 together. It's wonderful, and it's nice to see you in person.
21 I've seen very few people in person in a while. So have a
22 great day, Counsel; okay.
23 MR. LANCASTER: Thank you.
24 MR. BENEDICT: Thank you, Your Honor.
25 MR. CHILDS: Okay. And, obviously, I want to get my

exhibit books back because I mean, don't know what's going to happen in the future so.

THE COURT: Right. Wait.

MR. BENEDICT: I'm sorry to interrupt, but do you want me to --

THE COURT: Here's your --

MR. CHILDS: Yeah. Yeah. Let me have -- yeah, if I could keep those.

THE COURT: Sure, you can have anything back that you want, Mr. Childs.

MR. CHILDS: Yeah.

THE COURT: All right. Thank you, Madam Clerk. All right.

MR. CHILDS: So.

THE COURT: Just give me a moment to --

MR. CHILDS: I got all afternoon, Judge.

THE COURT: I just want to make sure I have all the -- you have exhibits there?

MR. CHILDS: Yeah.

THE COURT: That you can use --

MR. CHILDS: And in that pleadings book you should have the second amended complaint is -- I'd have to look --

THE COURT: It's right here. Got it.

MR. CHILDS: -- probably whatever exhibit, there's at least --

1 THE COURT: Okay. Just a moment. Second amended
2 complaint and that's Exhibit 7.
3 MR. CHILDS: Because it's chronological.
4 THE COURT: I'm there, yes. Very nice preparation of
5 your exhibits, Mr. Childs.
6 MR. CHILDS: Thank you.
7 THE COURT: Okay.
8 MR. CHILDS: Now, that's a big chore.
9 THE COURT: I know it is.
10 MR. CHILDS: Yeah.
11 THE COURT: You know, I've been an attorney for 30
12 years and I've practiced.
13 MR. CHILDS: Well, that didn't --
14 THE COURT: I know. I know.
15 MR. CHILDS: Yeah, those things don't create
16 themselves.
17 THE COURT: No, I know, believe me. I've had help
18 doing them and I've done them on my own. So I see you as they
19 say now. I understand.
20 MR. CHILDS: So I think that perhaps I should start
21 with --
22 THE COURT: Okay. I just want to make a record. We
23 are now moving into -- the jury trial has been set for
24 February --
25 MR. CHILDS: 7th.

1 THE COURT: -- 7th on the other issues. We are
2 now -- Mr. Childs has been granted a default judgment with
3 respect to Mr. Bursey and Ms. Medina. And now we are moving
4 forward to the phase where he is -- it's a prove-up hearing;
5 okay?
6 MR. CHILDS: Yes.
7 THE COURT: I just want to make sure that this is --
8 I have a good record, Mr. Childs.
9 MR. CHILDS: Yeah. Maybe the other parties have left
10 and Mr. Dattala is still here. I'd like that to be in the
11 record. So do you want me to call him to give testimony,
12 Judge, or can we just prove it up on the --
13 THE COURT: Well, actually --
14 MR. CHILDS: -- on the complaint?
15 THE COURT: -- I want you to swear him in because I
16 have --
17 MR. CHILDS: Okay.
18 THE COURT: -- all my prove-ups sworn in.
19 MR. CHILDS: Can he stay there because --
20 THE COURT: Yes, of course.
21 MR. CHILDS: (indiscernible).
22 THE COURT: Of course. All right.
23 You can sit down, Mr. Dattala. If you're not well,
24 that's fine. Just raise your right hand.
25 Madam Clerk.

JOHN DATTALA

[having been called as a witness and being first duly sworn, testified as follows:]

THE CLERK: If you could please state and spell your first and last name for the record.

THE WITNESS: John Dattala. J-o-h-n, D-a-t-t-a-l-a.

THE CLERK: Thank you.

THE COURT: Please proceed, Mr. Childs.

MR. CHILDS: Okay. So I'm going to be referring to the second amended complaint --

THE COURT: Okay. I have it right in front of me.

MR. CHILDS: -- filed on January 31st, 2021.

THE COURT: Okay. Perfect. That's the document that I have.

MR. CHILDS: And I suggest but it's totally up to you that we go through each party separately. Like, because the damages are not the same.

THE COURT: Understood.

MR. CHILDS: So which --

THE COURT: Well, look, the clearer our record is -- we no longer have a jury waiting which is a very, for me, a very, for the Court, a very significant situation. We've moved forward, and so I think the most orderly fashion is the best fashion. So we're on the same page.

MR. CHILDS: No hurry. Thank you. So --

1 THE COURT: Yeah, exactly.
2 MR. CHILDS: So, frankly, it'd probably easier to
3 start with Medina.
4 THE COURT: Whatever -- it's your prove-up hearing,
5 Mr. Childs.
6 MR. CHILDS: Okay. So I just went through during the
7 break and noted the paragraphs where Medina is mentioned which
8 are --
9 THE COURT: Okay. You know what, let me get --
10 excuse me, one second.
11 All right. Go on, please. So what page do I need to
12 look at?
13 MR. CHILDS: Well, I started -- well, page 2.
14 THE COURT: Page 2, got it.
15 MR. CHILDS: And I'm just going to go down --
16 THE COURT: And we're starting with the default
17 prove-up of Ms. Medina?
18 MR. CHILDS: Yes.
19 THE COURT: Okay.
20 MR. CHILDS: Thank you.
21 So exhibit -- or sorry, paragraph 5.
22 THE COURT: Okay. Paragraph 5. Okay.
23 MR. CHILDS: It's on page 2. And I'm just going to
24 refer to paragraphs just --
25 THE COURT: No, that's good. This is very important.

1 All right. Go on.
2 MR. CHILDS: And so these are all admitted facts now,
3 that she was a resident. She was employed in or an agent of
4 WFG. Was within her scope of agent employment or agency
5 relationship in performing the acts described below.
6 THE COURT: Okay.
7 MR. CHILDS: Okay. And so now paragraph 30 -- let's
8 get them the way I had.
9 THE COURT: Paragraph 3.
10 MR. CHILDS: 30.
11 THE COURT: 30, 3-0.
12 MR. CHILDS: On page 7.
13 THE COURT: Okay. One moment. In fact, everything,
14 make sure you take your time. We're not in a hurry; okay?
15 MR. CHILDS: Yeah, because a lot of it has to do --
16 THE COURT: No, you're going to have to move back and
17 forth so I want you to take your time. So that we make sure we
18 have everything we need.
19 MR. CHILDS: A lot of it has to do with Bursey --
20 THE COURT: Okay. Well, just take your time looking
21 through them though; okay. So you don't miss anything.
22 MR. CHILDS: Paragraph --
23 THE COURT: 30 on page 7.
24 MR. CHILDS: -- 30, yeah. That's when Medina comes
25 back into the picture in the complaint. So I have a civil

1 conspiracy cause of action that's going to come in later, but
2 paragraph 30 is that on April 29th Bursey and Medina conspired
3 to further Bursey's fraudulent scheme, which is described
4 earlier, by forging Dattala's signature on two documents titled
5 affidavit of grantor supporting the fact that Dattala was
6 making numerous factual representations about the title to 59
7 Sacramento and Colusa which has been resolved --
8 THE COURT: Understood.
9 MR. CHILDS: -- with Medina notarizing that document.
10 THE COURT: Right. Let's go to 31, paragraph 31.
11 MR. CHILDS: Well, 32 I think. Well, 31 says he did
12 not sign the affidavit --
13 THE COURT: And I think that's important.
14 MR. CHILDS: Yeah, described in paragraph 3.
15 THE COURT: Right.
16 MR. CHILDS: And then 32 just she's a notary public.
17 And so this is -- she produced what was represented to be --
18 this is a true, correct and complete copy of her notary book
19 with Dattala's purported signatures on the affidavit of grantor
20 described in paragraph 30.
21 THE COURT: Okay. 33?
22 MR. CHILDS: And she purportedly -- 33, purportedly
23 provided a copy of her notary book to support her own
24 affidavits to WFG. And WFG provided that copy of Bursey, and
25 that copy was filed with the court by Bursey's attorney on June

3rd, 2019, to contradict Dattala's statements about not signing the affidavits of grantor described in paragraph 30 above.

THE COURT: Okay.

MR. CHILDS: So this is a -- this was filed in exhibit to -- by Bursey's attorney on June 3rd, 2019, the notary book.

THE COURT: Let me just make a note of this.

MR. CHILDS: And on -- so go on to 34. And then she's signing affidavit on --

THE COURT: On June 7th, what year?

MR. CHILDS: 2019. June 3rd, 2019.

THE COURT: Okay. Thank you. June 3rd?

MR. CHILDS: June 3rd, 2019.

THE COURT: Okay.

MR. CHILDS: This is when Bursey had filed a motion. Judge Togliatti is the Judge that heard this motion. Bursey had filed a motion to cancel the lis pendens.

THE COURT: Right.

MR. CHILDS: And then Mr. Dattala filed an opposition, and then Bursey filed this supplement on June 3rd.

THE COURT: Understood. And then paragraph 34.

MR. CHILDS: Okay. Medina signed an affidavit dated April 29, 2019, falsely stating that she had complied with all applicable state and local laws concerning Bursey's signature on the affidavits of grantor described in paragraph 30 above.

1 And then 35 is that Medina signed an affidavit dated
2 June 3rd falsely stating that she had complied with all
3 applicable state and local laws concerning Dattala's signature
4 on the affidavits of grantor described in paragraph 30 above.
5 Just want to be clear for the Court, separate affidavit. Yeah,
6 on June 3rd.
7 THE COURT: Do you have those exhibits?
8 MR. CHILDS: Yes. I --
9 THE COURT: Okay. But what we're going to do after
10 we go through this, we're going to pick out each exhibit so
11 that they can be -- I need those exhibits for this; okay?
12 MR. CHILDS: We'll do that.
13 THE COURT: All right. I just don't want to take the
14 time to interrupt each paragraph and find an exhibit; all
15 right?
16 MR. CHILDS: I got them. Both of the -- okay. 36 is
17 both of Medina's affidavits described in paragraph 34 and 35
18 purport to be supported by a copy of her notary law book. 37,
19 in both of Medina's affidavits described in paragraphs 34 and
20 35 above she certifies under penalty, in quotes, under penalty
21 of perjury I am authorized to act as a notary public in and for
22 the county and state -- in and for the above county and state
23 and that in performing my duties as a notary public I have
24 complied with all applicable state and local laws, end quote.
25 THE COURT: Right.

1 MR. CHILDS: Now 38 is just a recitation of the
2 statute and I would like to read that on the record.
3 THE COURT: That's fine.
4 MR. CHILDS: Okay. NRS 240.120, sub 1, sub (d), as
5 in David, states as follows; NRS 240.120, Journal of notarial
6 acts. Duty to maintain contents, verification based upon
7 credible witness, copy of entry storage, period of retention,
8 report of loss or theft and exceptions.
9 Sub 1, except as otherwise provided in Subsection 2,
10 each notary public shall keep a journal in his or her office in
11 which --
12 THE COURT: Can you just read a little bit slower?
13 MR. CHILDS: Oh, sure.
14 THE COURT: Thank you.
15 MR. CHILDS: So keep a journal in his or her office
16 in which the notary public shall enter for each notarial act
17 performed at the time the act is performed.
18 Subsection D, except as otherwise as provided
19 Subsection 3, the name and signature -- this is bold in the
20 complaint -- name and signature of the person whose signature
21 is being notarized. That's the end of paragraph 38.
22 39, Medina's log -- notary log book filed on June
23 3rd, 2019, does not have the signature of either Bursey or --
24 of either Dattala or Bursey.
25 Paragraph 40, in an effort to cover up her violation

of NRS 120 -- 240.120, Sub 1, Sub (d); Medina either forged or had someone forge Dattala's signature in her notary book. Paragraph -- let's see here. So now we skip into paragraph 61.

THE COURT: Okay. Just give me one moment. Okay. 61; correct?

MR. CHILDS: Yes, page 12.

THE COURT: Okay. Let me get (video interference). Okay.

MR. CHILDS: This is the --

THE COURT: 61. Wait just a moment. 62 -- okay. 61, go ahead. That's on the bottom of page 12 --

MR. CHILDS: Yes. This is --

THE COURT: -- of the second amended complaint.

MR. CHILDS: Yes.

THE COURT: Go on.

MR. CHILDS: This is the fourth cause of action which is civil conspiracy as to both defendants, Bursey and Medina. Now, keep in mind, Bursey has also admitted these facts so.

THE COURT: Understood. But we're going to go through Mr. Bursey --

MR. CHILDS: Yeah, I know.

THE COURT: -- separately.

MR. CHILDS: Right. We're going to go through them separately.

So 61 is at the reallegation paragraph about previous

1 paragraphs as it --
2 THE COURT: Right.
3 MR. CHILDS: -- fully set forth. And then 62, the
4 forged affidavits of grantor described in paragraph 30 above
5 are evidence of the concert of action between Bursey and
6 Medina.
7 63, Bursey and Medina engaged in concerted action to
8 allow Bursey to sell the 50 Sacramento property and the 59
9 Sacramento property using an escrow and title insurance as
10 described above. These are allegations about Bursey above.
11 THE COURT: Yes.
12 MR. CHILDS: And 64 is, The concerted action engaged
13 in by Bursey and Medina was intended to accomplish an unlawful
14 objective for the purpose of harming plaintiff, and the
15 plaintiff is Mr. Dattala.
16 THE COURT: Yes.
17 MR. CHILDS: 65, plaintiff was damaged by the acts --
18 act or acts of Bursey and Medina and plaintiff has suffered
19 general inconsequential damages in excess of $15,000.
20 And then paragraph 66 is just the allegation that my
21 client should be entitled to attorney fees and cost.
22 THE COURT: Okay.
23 MR. CHILDS: So 67 is negligence per se. Paragraph
24 67, it's in the negligence per se cause of action.
25 THE COURT: Right.

1 MR. CHILDS: 67 is the reallegation paragraph about
2 previously made representations.
3 68 is repeating the statute cite of -- that I put on
4 the record about five minutes ago.
5 THE COURT: NRS 240.120 1(d).
6 MR. CHILDS: Yes. And I'm not going to read that
7 into the record again, it just recites.
8 THE COURT: It's -- very quickly though, it -- the
9 one that imposes a specific duty as a notary; all right?
10 MR. CHILDS: Yeah. Mainly to have the signature of a
11 person in her notary book. That's the key part of that
12 statute.
13 THE COURT: Correct.
14 MR. CHILDS: So 69 is that Medina breached that duty
15 by notarizing two affidavits described in paragraph 30 without
16 complying with NRS 240.120, sub 1, sub (d).
17 THE COURT: Okay.
18 MR. CHILDS: 70, Medina, at all times, was an
19 employer agent under the control of WFG.
20 71 is Medina was within the nature and scope of her
21 employment as an employee or was acting as WFG's agent or was
22 in the scope of agency when performing the notarial acts
23 described above.
24 And then 72 is that -- this is important for a
25 negligence per se cause of action. Dattala is in the class of

1 persons whom NRS 240.120, sub 1, sub (d) is intended to
2 protect, and the injury to him is the type against which NRS
3 240.120, sub 1, sub (d) is intended to protect. In other
4 words, he's in the class of persons that that statute --
5 THE COURT: Correct.
6 MR. CHILDS: -- applies to.
7 And then -- I mean, 73 says that WFG is liable for
8 damages incurred as a result of Medina's negligence under the
9 doctrine of respondeat superior.
10 And then 74 is due to the violation of NRS 240.120,
11 sub 1, sub (d) plaintiff has been damaged in an amount in
12 excess of $15,000 which amount is going to be proven at trial,
13 which we're going to do in this prove-up.
14 THE COURT: In the prove-up hearing.
15 MR. CHILDS: Yeah, in about five minutes we're going
16 to -- I'm going to get to that.
17 And then paragraph 75 is that plaintiff has been
18 required to retain an attorney --
19 THE COURT: Right.
20 MR. CHILDS: -- and incur costs so. Skipping ahead
21 to paragraph 83 which is at the bottom of page 15.
22 THE COURT: Just a moment. I want to be real with
23 you. This is on the bottom of page 15 and the cause of
24 action --
25 MR. CHILDS: Is the --

1 THE COURT: -- RICO start at line 23. Go on.
2 MR. CHILDS: Yeah. This is the seventh cause of
3 action RICO. Paragraph 83 is the reallegation paragraph.
4 THE COURT: Correct.
5 MR. CHILDS: Paragraph 84.
6 THE COURT: Give me a moment. Okay.
7 MR. CHILDS: And let's see here. It describes Bursey
8 engaging in the criminal enterprise with at least one other
9 individual and engaged in the criminal activity by knowingly
10 making false representations to commit fraud on plaintiff,
11 forging plaintiff's signature on real estate and financial
12 documents, placing forged documents in the public record,
13 committing perjury by executing and recording false
14 declarations of value forms and conspiring with Medina, as a
15 notary public, to fabricate signatures on documents, to sign
16 and stamp real estate documents with notary seals to give the
17 document the appearance of authenticity, genuineness and
18 enforceability.
19 Paragraph 85, Defendant Medina engaged in a criminal
20 enterprise with at least one other individual by engaging in
21 criminal activity with Bursey by falsely notarizing real estate
22 documents in violation of NRS 240.001 to 240.169 inclusive
23 where a regulation or order adopted or issued pursuant thereto
24 by forging Dattala's signature in her notary book and by
25 committing perjury by executing the affidavits described above

1 in paragraphs 34 and 35.
2 Paragraph 86, NRS 240.175 makes a violation of NRS
3 240.001 to 240.169 inclusive where a regulation or order
4 adopted or issued pursuant thereto a Category D felony. That's
5 important for the RICO.
6 THE COURT: For RICO, yes.
7 MR. CHILDS: Yeah, that you have to have it.
8 THE COURT: I know. I use to prosecute --
9 MR. CHILDS: Okay.
10 THE COURT: -- white collar crime.
11 MR. CHILDS: I'm just saying why I'm fixated on it.
12 THE COURT: No, no, I know.
13 MR. CHILDS: Okay.
14 THE COURT: I used to prosecute white collar crimes,
15 I understand.
16 MR. CHILDS: Paragraph 87, Defendant Medina engaged
17 in criminal enterprise with at least one other individual, that
18 being Bursey, by engaging in criminal activity with Bursey by
19 violating NRS 205.120 which is a Category D felony.
20 Paragraph 88, defendant Medina engaged in criminal
21 enterprise with at least one other individual, that being
22 Bursey, by engaging in criminal activity with Bursey by
23 violating NRS 205.090 which is a Category D felony.
24 Paragraph 89, Medina committed perjury by executing
25 the documents described above in paragraphs 34 and 35. And

1 then if you -- I don't know if you have a question about that
2 because she signed an affidavit under penalty of perjury that
3 she had complied with that statute --
4 THE COURT: Right.
5 MR. CHILDS: -- when she had not complied with that
6 notary journal statute.
7 Paragraph 90, Medina offered false evidence by
8 executing the affidavits described in paragraphs 34 and 35.
9 THE COURT: Just give me one moment. I'm making a
10 note. Okay.
11 So did you say you just read 90?
12 MR. CHILDS: 90. Now I'm on 91. It's on top of page
13 17.
14 THE COURT: Okay. So wait -- 90, let me just take a
15 quick look at it. Okay. Very good. Let's go to page 91.
16 MR. CHILDS: Okay.
17 THE COURT: That is on line 1, paragraph 91, line 1
18 of page 17. Go on.
19 MR. CHILDS: Bursey and Medina engaged in unlawful
20 activity as defined by NRS 207.400.
21 92, as a direct and probable cause -- strike that.
22 As a direct and probable result of the actions of defendants,
23 Bursey and Medina, plaintiffs have -- has suffered and will
24 suffer general inconsequential damages and will suffer general
25 inconsequential damages in the amount of $370,000 exclusive of

1 cost and interest. And I'll get to that in a second; we're
2 almost done.
3 THE COURT: Okay.
4 MR. CHILDS: And then paragraph 93 is, plaintiff has
5 been required to retain the services of an attorney, and the
6 attorney can request for attorney's fees and costs.
7 THE COURT: Understood.
8 MR. CHILDS: So if you look at page 10.
9 THE COURT: Okay. Give me a moment to get there.
10 All right. I'm there.
11 MR. CHILDS: At the top, there's a graph -- not a
12 graph but --
13 THE COURT: Starts at page 1, but yeah it's sort of a
14 graph.
15 MR. CHILDS: There's a mathematical chart --
16 THE COURT: Right.
17 MR. CHILDS: -- or a chart with just -- summarizing
18 and itemizing the damages that plaintiff suffered, and it adds
19 up to $370,000. And I have -- we can go over the documents,
20 you know. I have documents supporting --
21 THE COURT: Well, we have -- we do have to have
22 exhibits.
23 MR. CHILDS: Yeah, I have these in my exhibits.
24 That's where I got the $370,000 number from --
25 THE COURT: Understood.

1 MR. CHILDS: -- from paragraph 92.
2 THE COURT: Thank you.
3 MR. CHILDS: And I can -- if you have questions about
4 that, I could certainly --
5 THE COURT: Yes, I'd like you to go through it.
6 MR. CHILDS: Oh, okay. Well --
7 THE COURT: So our record is --
8 MR. CHILDS: He had a contract from Bursey --
9 THE COURT: He?
10 MR. CHILDS: Plaintiff.
11 THE COURT: Okay.
12 MR. CHILDS: John Dattala had a contract to sell 50
13 Sacramento to Bursey for $150,000.
14 THE COURT: Okay.
15 MR. CHILDS: And he had a contract to sell 59
16 Sacramento for $220,000. That's where I got the $370,000 from.
17 THE COURT: Correct.
18 MR. CHILDS: And then by his own admission, he
19 received --
20 THE COURT: He is the plaintiff?
21 MR. CHILDS: Yes, thank you. I need to slow down.
22 THE COURT: I just want to make sure we have a good
23 record.
24 MR. CHILDS: By his own admission, plaintiff received
25 $10,000 in earnest money for both properties, $5,000 each.

1 THE COURT: Okay. Let me write that down.
2 MR. CHILDS: And then 446 --
3 THE COURT: Just one moment. Okay.
4 MR. CHILDS: Yeah, I'm just reading from paragraph --
5 THE COURT: I have it right here. Actually, why
6 don't you go to paragraph 44.
7 MR. CHILDS: Yeah, I know.
8 THE COURT: Okay. Go on.
9 MR. CHILDS: And then he $4,467 of principal from
10 Mr. Bursey and $9,996 in interest which I don't think that they
11 should get credit for because that was interest.
12 THE COURT: Right.
13 MR. CHILDS: Yeah. The principal was $4,467. And so
14 that amount, the 10,000 and the $4,467 should be deducted from
15 the $370,000 because he received it.
16 THE COURT: Okay. So that's -- so we're looking at
17 3 -- and what paragraph was that?
18 MR. CHILDS: Well, I'm just reading from the chart --
19 THE COURT: Right. Okay. So --
20 MR. CHILDS: -- and then if you read paragraph 44
21 below it.
22 THE COURT: -- because there was an earnest money
23 deposit, 5,000 for each property.
24 MR. CHILDS: Right.
25 THE COURT: The 370,000 would be actually 360,000

1 without the interest issues; right?
2 MR. CHILDS: Yes.
3 THE COURT: Okay.
4 MR. CHILDS: And then also I'm straight up.
5 Mr. Dattala received $4,467 of principal.
6 THE COURT: 4,000.
7 MR. CHILDS: $467 of principal. So it should be
8 $360,000 minus 4467.
9 THE COURT: Okay. Minus 4,000 --
10 MR. CHILDS: $467.
11 THE COURT: -- $467.
12 MR. CHILDS: So that's --
13 THE COURT: I've got to do that on a calculator
14 because --
15 MR. CHILDS: Okay.
16 THE COURT: -- I just want to make sure or you -- if
17 you one so we can --
18 MR. CHILDS: No, but we can do it. That's --
19 THE COURT: I just want to make sure that we have
20 everything perfectly done. All right. Go on.
21 MR. CHILDS: That's all I got on Medina.
22 THE COURT: Okay. Why don't we start with Bursey
23 now. Let's go on to Bursey. And then we need to pull, as we
24 go -- then we'll back up and pull the exhibits; all right? All
25 right. So now we have --

1 MR. CHILDS: And, Judge, do you want to make a list
2 of the exhibits that I need to pull out because some of
3 these --
4 THE COURT: Yeah, that's a good idea. Let's do that
5 now. All right. So I'm just going to go by your -- all right.
6 So the first thing I have is paragraph 3. Okay. I don't think
7 you need an exhibit for that. Or that it was in their scope of
8 employment. Walk this through with me, please.
9 MR. CHILDS: Okay.
10 THE COURT: All right. Go to paragraph 30.
11 MR. CHILDS: Affidavit of grantor.
12 THE COURT: Okay.
13 MR. CHILDS: April 29th.
14 THE COURT: Correct. So the first one we need,
15 exhibits, is the affidavit -- it goes with paragraph 31, and
16 that's going to be the affidavits --
17 MR. CHILDS: Yep.
18 THE COURT: -- of the grantor. Okay. Are we on the
19 same page here?
20 MR. CHILDS: Yes, I'm writing that down.
21 THE COURT: Okay. All right. Okay. We're also
22 going to need a second exhibit that's consistent with paragraph
23 32.
24 MR. CHILDS: Mm-hmm. Her notary book.
25 THE COURT: Her notary book. All right. And I'm

1 going to take a quick look at everything before. Okay. 30 --
2 also 33 -- hold on. Provided a copy of her notary log book to
3 support her own affidavits. So we also need -- so we need the
4 affidavits, and we need Medina's notary book. But Number 33
5 discusses a copy of her notary log book which I believe is the
6 same thing; correct?
7 MR. CHILDS: Yeah, that's what was filed on June 3rd,
8 2019, in this case.
9 THE COURT: All right. Hold on. June --
10 MR. CHILDS: 3rd, 2019.
11 THE COURT: -- 3rd. Okay. Very good. All right.
12 Let's go on to -- okay. That -- and also that's discussed in
13 paragraph 33. We've already done that. Hold on a second.
14 They provided and that's the copy that they provided to Bursey.
15 MR. CHILDS: It was filed.
16 THE COURT: And that copy was filed in the record
17 by -- Okay. Got it. You're a little bit ahead of me. All
18 right.
19 What about 34, is there anything else?
20 MR. CHILDS: Yes. These are other affidavits.
21 THE COURT: Okay. No, that's very important.
22 MR. CHILDS: Yeah, different affidavit.
23 THE COURT: So let's go to paragraph 34. And these
24 are other affidavits; right?
25 MR. CHILDS: Yep, different affidavits.

1 THE COURT: And do you know what exhibits those are
2 by chance or -- of Ms. Medina?
3 MR. CHILDS: Let's do that a separate time. I
4 might -- you might want to take a break and give me 10 minutes
5 to --
6 THE COURT: All right. So far I have four. Yeah,
7 that's a good idea. Maybe you can take lunch and while you --
8 MR. CHILDS: Yeah.
9 THE COURT: -- organize everything and then we'll
10 just come back and wrap it up; okay?
11 MR. CHILDS: Yeah, let's make a list of everything
12 and then I'll -- it might take me a little bit.
13 THE COURT: No, I understand. Okay. So do you want
14 to make a list now or not?
15 MR. CHILDS: No, I want to make the list now.
16 THE COURT: Okay.
17 MR. CHILDS: And then we'll take a break.
18 THE COURT: All right. Very good. Just give me a
19 little bit.
20 MR. CHILDS: I'll go through them.
21 THE COURT: All right. So paragraph 34 -- now let's
22 go to paragraph -- so those are the affidavits filed as well?
23 MR. CHILDS: Yeah, they're not filed. These are just
24 documents that --
25 THE COURT: Documents. Okay.

1 MR. CHILDS: -- WFG had.
2 Yeah, so maybe I should walk through what the -- what
3 happened was there was an uninsured deed, this quick-claim
4 deed, that Mr. Bursey had forged. And then WFG sent Medina
5 out, theoretically, to get my client's signature on these
6 affidavits because there wasn't an insured deed.
7 THE COURT: Right.
8 MR. CHILDS: And so that's what all these -- that's
9 what generated all these -- that's what led them --
10 THE COURT: Okay. So we're definitely going to want
11 all of those. All right.
12 MR. CHILDS: And then there's another affidavit on
13 June 3rd.
14 THE COURT: Okay. And there's also another
15 affidavit.
16 MR. CHILDS: That's on paragraph 35.
17 THE COURT: Okay. June 3rd, paragraph 35. Then
18 let's go to 36. I don't think there -- I think that includes
19 the others; doesn't it?
20 MR. CHILDS: Mm-hmm.
21 THE COURT: It says here --
22 MR. CHILDS: Yes, it goes --
23 THE COURT: -- both of them, in paragraphs 35, it
24 just of sort of your -- I don't think that's a different
25 exhibit.

1 MR. CHILDS: No.
2 THE COURT: It's the one we just discussed.
3 37 -- let me know if you think differently.
4 MR. CHILDS: I -- no, well --
5 THE COURT: Okay. Right. And that's where she,
6 under penalty of perjury, authorized to act as a notary public
7 in the state above -- okay. So that's affidavit, we need that.
8 That's paragraph 37. It might be the same one.
9 MR. CHILDS: It's the same one.
10 THE COURT: I know. But I'm just still making a
11 list. All right. 38 is the actual statute. We don't need
12 that.
13 MR. CHILDS: Nope.
14 THE COURT: 39, it's the log book.
15 MR. CHILDS: So that's the same.
16 THE COURT: We already have that.
17 MR. CHILDS: It's the same one.
18 THE COURT: Right. Let's go to 40. In an effort to
19 cover up she either forged or had someone forge Mr. Dattala's
20 signature in her notary book. And I imagine that's going to be
21 in the notary book?
22 MR. CHILDS: This is a different exhibit. So --
23 THE COURT: Okay.
24 MR. CHILDS: Yeah. This is a --
25 THE COURT: Next is paragraph --

1 MR. CHILDS: This is the punch line, this one.
2 THE COURT: -- 40. Just give me one moment.
3 MR. CHILDS: Sure.
4 THE COURT: 40 is the forged signature in her notary
5 book of Mr. Dattala.
6 MR. CHILDS: Mm-hmm. And I think that's pretty much
7 it probably.
8 THE COURT: Okay. Let's go to. Then I have the
9 chart at the top --
10 MR. CHILDS: Mm-hmm.
11 THE COURT: -- for 50 Sacramento.
12 MR. CHILDS: Okay.
13 THE COURT: And do you have evidence --
14 MR. CHILDS: Yes.
15 THE COURT: -- of that?
16 MR. CHILDS: Yes.
17 THE COURT: So I need for paragraph please -- hold
18 on, let me just.
19 MR. CHILDS: In the purchase agreements.
20 THE COURT: Hold on one second. Top of page -- it's
21 page -- it's paragraph 43. Top of page 10. This is we're
22 taking an inventory here. These are the purchase agreements?
23 MR. CHILDS: Yes.
24 THE COURT: Is that correct?
25 MR. CHILDS: One for each property.

1 THE COURT: Agreements, so two of them. One for 50
2 Sacramento and a second one for 59 Sacramento; right?
3 MR. CHILDS: Yes.
4 THE COURT: All right. Let's move forward. 44,
5 you're going to show -- so do we have evidence of the -- do we
6 have evidence of the $10,000 that he paid?
7 MR. CHILDS: Mm-hmm.
8 THE COURT: Let's make sure we have that in. That's
9 still part of 43.
10 MR. CHILDS: Sure.
11 THE COURT: 43, so --
12 MR. CHILDS: Yeah, because she gets a credit for
13 that.
14 THE COURT: -- evidence of the $10,000 paid. And
15 then we have paragraph 44. We need evidence of the 4,600 --
16 forgive me, 4,467 principal and the $9,976 --
17 MR. CHILDS: Yeah, but I'll be upfront. We don't
18 have that. It's just an acknowledgment --
19 THE COURT: -- in interest.
20 MR. CHILDS: -- that Bursey paid $1,500 a month
21 for -- do we have evidence of that, John?
22 MR. DATTALA: (Indiscernible.)
23 THE COURT: You don't have --
24 MR. CHILDS: That's just an acknowledgment that
25 Bursey paid $1,500 a month for, I think, 11 months.

1 THE COURT: Okay. Just a moment.
2 MR. CHILDS: But he can -- he's --
3 THE COURT: He can testify to that?
4 MR. CHILDS: He'll acknowledge -- yeah, he's --
5 THE COURT: Well, he's going to have to.
6 MR. CHILDS: He will.
7 THE COURT: If I don't have -- well, why don't we --
8 why don't you ask him that question right now?
9 MR. CHILDS: Okay.
10 THE COURT: Okay.
11 MR. CHILDS: John, so --
12 THE COURT: Mr. Bursey.
13 MR. CHILDS: During the time -- so just like the
14 timeframe, you -- this all happened on selling 50 Sacramento,
15 that's the property I'm talking about --
16 MR. DATTALA: Right.
17 MR. CHILDS: -- and he bought it in, like, July of
18 2018; correct?
19 MR. DATTALA: Right.
20 MR. CHILDS: And then what did you receive from him?
21 MR. DATTALA: He paid me $1400 a month on the house
22 and paid about 11 months.
23 THE COURT: For 11 months?
24 MR. DATTALA: And then just gave up on paying on it.
25 THE COURT: Okay.

1 MR. CHILDS: And I calculated this interest from the
2 amortization schedule.
3 THE COURT: Okay. So --
4 MR. CHILDS: At what interest rate was it?
5 MR. DATTALA: 8 percent interest.
6 THE COURT: You can do that during lunch time too to
7 be sure that everything's right. So $1300 a month --
8 MR. CHILDS: 14.
9 MR. DATTALA: 14.
10 THE COURT: 14. I'm sorry, I didn't hear that part.
11 MR. CHILDS: For 11 months.
12 THE COURT: For 11 months. So that equals?
13 MR. CHILDS: Should be about 13 --
14 THE COURT: Well, we'll make sure the math is right;
15 okay?
16 MR. CHILDS: Yeah. Okay.
17 THE COURT: All right. So he's -- Mr. Dattala has
18 testified to that. So -- all right.
19 Let's move on and let's go to -- let's see. You went
20 straight to the third cause of action. Or no, we went to --
21 MR. CHILDS: Yeah, it's on page 12, but --
22 THE COURT: Page 12. You went to civil conspiracy.
23 MR. CHILDS: Yeah. And this just talks about the
24 affidavits in paragraph 40 so I think we're --
25 THE COURT: Okay. 61 -- let me just write this down.

1 Equals affidavits above; right?
2 MR. CHILDS: Yeah.
3 THE COURT: Okay. I just wanted to recover
4 everything.
5 Now, what about page 62? We've already -- you have
6 to present the forged affidavits --
7 MR. CHILDS: Right.
8 THE COURT: -- that are discussed in paragraph 30.
9 Then 63, I think that all of the exhibits will show
10 that, that they acted in concert; right?
11 MR. CHILDS: Mm-hmm.
12 THE COURT: 64, I think that that's proved in -- with
13 the -- you've already made a record of that and it's -- I
14 believe it'll be proved with the evidence that we've already
15 discussed. 65, the same.
16 And 66, Mr. Bursey is -- I'm going to have to have
17 a -- this is paragraph 66, attorney's fees will be granted
18 and -- reasonable attorney's fees, and I need to have a -- if
19 you don't have them now, you know, pursuant to -- I can't
20 believe I can't think of the case right now.
21 MR. CHILDS: Yeah, I know. The Cardel (phonetic) or
22 something like that. Candle, something.
23 THE COURT: *Cadle* is costs.
24 MR. CHILDS: But I'll -- *Brunzell*.
25 THE COURT: And *Brunzell*. So I need to see something

with the analysis because --

MR. CHILDS: I know how to do that.

THE COURT: I know, I know you do, but I'm just making a record. So that will be provided to this Court.

Are the attorney's fees pursuant to Brunzell and the costs pursuant to Cadle, and they need to be followed very specifically because before I don't think that was happening. I've always requested it. I've always -- but now I think the Supreme Court is looking closer. But the good news is I've been doing it the entire time so.

MR. CHILDS: It's going to be a couple of hundred pages.

THE COURT: Well, yeah. All right. So cause of action Number 5, negligence per se and that starts on page 17.

MR. CHILDS: Mm-hmm.

THE COURT: No, forgive me, paragraph -- Number 17, line Number 17, page 13. So this is the fifth cause of action and it's negligence per se. So it's -- you have 67, your reallegation paragraph. You're talking about the -- 68, talks about the journal of notarial acts which you've already discussed in the record. 68, you've already discussed, the breach of a duty.

70, you've already made a record of. Number 71, you have. 72, you've made a record. All right. I don't think there's any new evidence in paragraph 69 through 75 except for

1 trial on 74 is gone and this is a prove-up hearing.
2 Then let's go to the seventh cause of action which
3 begins on page 15, line 23. And that is the RICO. Okay. And
4 that is the restatement paragraph. Let's go to page 84. Take
5 a look at that and see if there's a different exhibit. I don't
6 think so but let me know --
7 MR. CHILDS: No, I think --
8 THE COURT: -- let me know if there is.
9 MR. CHILDS: No, I think it's talking about the
10 exhibits on 34 and 35 --
11 THE COURT: That's what I think.
12 MR. CHILDS: -- which are the separate affidavits.
13 THE COURT: Right. The ones that you indicated
14 before.
15 MR. CHILDS: I'm going to get them.
16 THE COURT: Okay. 86, I think that you have
17 everything there. 87, the same. 88, the same. These are your
18 allegations which are correct in my view. Okay. 89 --
19 MR. CHILDS: These are the affidavits that I
20 discussed before.
21 THE COURT: Right. 90, the same. 91, the same. And
22 2 the same. 93, I don't think you have any more exhibits to
23 do.
24 Just one moment, Mr. Childs.
25 Let's take a 10 minute comfort break, Mr. Childs, 10

1 to 15 minutes; all right?
2 (Court recessed 1:19 p.m., until 1:40 p.m.)
3 THE COURT: All right. Mr. Childs, so we have just
4 gone through the discussion of Ms. Medina, and we've taken the
5 time to list the exhibits that pertain to Ms. Medina's
6 defaulting.
7 MR. CHILDS: Yeah, do you want to do those and get
8 Medina out of the way or? Some of them are the same, like
9 the --
10 THE COURT: I know -- no, no. I wanted -- we're
11 listing them. We've already listed them. Some of them are
12 going to be the same, I'm certain, for --
13 MR. CHILDS: Mm-hmm. Okay. Bursey.
14 THE COURT: -- Mr. Bursey, but no, I want you to pull
15 those during a break so --
16 MR. CHILDS: I got them.
17 THE COURT: Okay. You have them?
18 MR. CHILDS: Yeah.
19 THE COURT: Okay. Let's make sure that we know which
20 ones -- do you want a Post-it so that when you give them to
21 the --
22 MR. CHILDS: I put your book up there and we can look
23 at them.
24 THE COURT: Let's go through Mr. Bursey now; okay?
25 Let's do -- that was our original plan.

1 MR. CHILDS: Yep.
2 THE COURT: Okay. Let's go through Mr. Bursey, and
3 this is his default judgment (indiscernible) -- his prove-up;
4 okay? Let's keep it organized. Some of the evidence is
5 overlapping, of course, because they conspired, but we still
6 need to make a clean -- a very good record. Okay.
7 MR. CHILDS: So I'm still referring to the second
8 amended complaint.
9 THE COURT: Okay. Very good.
10 MR. CHILDS: And paragraph 3 is the -- just
11 describing that he's a -- was a resident and now is a resident
12 of Wayne County, Michigan.
13 THE COURT: Just give me one moment. I'm going to a
14 different color so that I can distinguish it. All right. Very
15 good, go on. Paragraph 3; you say?
16 MR. CHILDS: Yeah, paragraph 3.
17 THE COURT: Okay. That's on page --
18 MR. CHILDS: 2.
19 THE COURT: -- 2, line 7 of the complaint -- the
20 second amended complaint that he was at the time a resident of
21 Clark County; is that correct?
22 MR. CHILDS: Mm-hmm. Yeah, now he's a resident of
23 Wayne County, Michigan.
24 THE COURT: Okay. Go on.
25 MR. CHILDS: And then page 10 -- or strike that. Now

1 you got me doing it. Paragraph --
2 THE COURT: Paragraph 10?
3 MR. CHILDS: Paragraph 10. I'm sorry. I'm getting
4 tired too. Okay.
5 THE COURT: Paragraph 10 starts on line 14 of page 3
6 of the second amended complaint.
7 MR. CHILDS: And it talks about these parcels of real
8 estate. Do you want me to read these into the record, Judge,
9 or?
10 THE COURT: Yes.
11 MR. CHILDS: Okay. When Dattala met Bursey in 2016,
12 Dattala owned Parcels of Real Property described below referred
13 to collectively as the subject properties. A, 50 Sacramento
14 Drive, Las Vegas, Nevada, 89110 was his residence since 1992,
15 referred to herein as the 50 Sacramento Property. Street
16 address, 50 Sacramento Drive, Las Vegas, Nevada, 89110. Brief
17 legal description, Lot 28, Block 2 of Meadow Homes Unit
18 Number 1 as shown in Plat Book 7, page 5 in the Clark County
19 Recorder's Office. APN, which stands for Assessor's Parcel
20 Number, 140-31-817-043.
21 THE COURT: Okay.
22 MR. CHILDS: B, 59 Sacramento Drive, Las Vegas,
23 Nevada, 89110. Referred to herein as 50 Sacramento as The 59
24 Sacramento Property. Street address, 59 Sacramento Drive, Las
25 Vegas, Nevada, 89110. Brief legal description, Lot 87 and

1 Block 5 of Meadow Homes Unit Number 3, second amended, as shown
2 in Plat Book 9, page 63 in the Clark County Recorder's Office.
3 APN 140 31 810 025.
4 THE COURT: Okay. Very good.
5 MR. CHILDS: And then C is the Colusa Drive property
6 that's been resolved.
7 THE COURT: That's already in -- that's not in
8 this -- okay. Thank you.
9 MR. CHILDS: So I'm going to skip reading that legal
10 description.
11 THE COURT: Good.
12 MR. CHILDS: Okay. And then 11, paragraph 11,
13 Dattala had no relationship with Bursey other than the dealings
14 with the three properties described above.
15 THE COURT: Okay.
16 MR. CHILDS: And I think we should put on the record
17 that this 4029 Colusa Circle, Las Vegas, Nevada, 89110 was
18 resolved by previous order back in October of 2020.
19 THE COURT: Okay.
20 MR. CHILDS: Thank you. Paragraph 12, although
21 throughout his dealings with Bursey, Dattala drafted no
22 documents, Dattala is at most semi-literate and is incapable of
23 drafting legal documents involving real estate transactions.
24 Dattala does not even have a copier and until the middle of May
25 2019 did not have an email address.

1 Paragraph 13, in 2017, Bursey sought to befriend
2 Dattala and raise the idea of Dattala selling Dattala's three
3 properties described above.
4 Paragraph 14, Bursey presented Dattala with a
5 purchase agreement which was signed by Bursey and Dattala on
6 June 3rd, 2018, for the purchase of the 50 Sacramento property.
7 The June 3rd, 2018, purchase agreement required Bursey to pay
8 Dattala $5,000 and transfer was to be made by warranty deed or
9 deed of trust. Period, new sentence. A deed of trust in the
10 amount of $150,000 was recorded on August 2nd, 2019,
11 encumbering title to the 50 Sacramento property.
12 THE COURT: Before we go on, Mr. Childs, have we
13 listed this as an exhibit yet?
14 MR. CHILDS: You know, I don't think -- second
15 amended complaint?
16 THE COURT: The subject of paragraph --
17 MR. CHILDS: No, I have it. The purchase agreement?
18 THE COURT: Right.
19 MR. CHILDS: Yes, I have that.
20 THE COURT: So let's add that to our exhibit list
21 now.
22 MR. CHILDS: Yeah.
23 THE COURT: So that we don't have to go back
24 afterwards. So that'll be the purchase agreement; okay? That
25 way we don't have to -- I mean, since we're not -- we don't

1 have other attorneys waiting. All right. Let's go on.
2 MR. CHILDS: Now you threw me off, I forgot where --
3 THE COURT: I'm sorry. We're on 14, and it says
4 Bursey presented Dattala with a purchase agreement.
5 MR. CHILDS: Okay.
6 THE COURT: We're going to need that.
7 MR. CHILDS: Yeah, which was signed by Bursey and
8 Dattala on June 3rd, 2018, for the purchase of the 50
9 Sacramento property. The June 3rd, 2018, purchase agreement
10 required Bursey to pay Dattala $5,000, and transfer was to be
11 by, quote, warranty deed or deed of trust, end quote. The deed
12 of trust in the amount of $150,000 was recorded on August 2nd,
13 2018, encumbering title to the 50 Sacramento property.
14 THE COURT: Okay. Mr. Childs, that's going to be
15 another exhibit.
16 MR. CHILDS: No, that's it, that's the exhibit.
17 THE COURT: Okay. Okay. Very good. Go on.
18 MR. CHILDS: Bursey did pay Dattala $5,000 on or
19 about June 3rd, 2018, as required by the June 3rd, 2018,
20 purchase agreement. The August 2nd, 2018, deed of trust
21 encumbering title to the 50 Sacramento property states that
22 there is an associated promissory note, but Dattala does not
23 believe there was ever a promissory note executed which was
24 associated with the August 2nd, 2018, deed of trust.
25 THE COURT: So, Mr. Dattala, did you receive that? I

1 just -- we're in a prove-up hearing so you can't just -- I want
2 to know.
3 Did you receive a promissory note for the 50
4 Sacramento property?
5 MR. DATTALA: No.
6 THE COURT: Okay. Thank you.
7 MR. CHILDS: With regards to the August 2nd, 2018,
8 deed of trust encumbering title to the 50 Sacramento property,
9 Bursey did pay $1443 per month for 10 months starting August
10 2018, with the last payment being made May 4th, 2019.
11 THE COURT: Okay.
12 MR. CHILDS: Paragraph 15, in the last --
13 THE COURT: Do you have anything to confirm that?
14 MR. CHILDS: The payment? No, just that Mr. --
15 THE COURT: Your client, Mr. Dattala, has already
16 testified to that.
17 MR. CHILDS: Yeah, that's --
18 THE COURT: Okay. Let's keep going. 15.
19 MR. CHILDS: In the latter part of 2018, Bursey made
20 the following factual representations to Dattala. A, that
21 Bursey's father had died; B, that Bursey expected an
22 inheritance from his deceased father's estate; C, that Bursey
23 wanted to buy the 59 Sacramento property and the Colusa
24 property from Dattala and planned to pay Dattala when Bursey
25 received his inheritance from his father's estate.

1 THE COURT: Before you go on.
2 Mr. Dattala, did Mr. Bursey indicate in 2018 the
3 latter part that his father had died?
4 MR. DATTALA: Yes.
5 THE COURT: Did Bursey indicate to you that he
6 expected an inheritance from his father's estate?
7 MR. DATTALA: Yes.
8 THE COURT: Did Bursey express to you that he wanted
9 to buy 59 Sacramento property, the -- forgive me, and we're not
10 going to talk about the Colusa property, really, once he
11 received his inheritance?
12 MR. DATTALA: Yes.
13 THE COURT: Okay. Very good. Let's go on.
14 MR. CHILDS: Paragraph 16, on March 19th, 2019, and
15 again on March 27th, 2019, Bursey represented to Dattala that
16 Dattala needed to fix the 50 Sacramento property so he could
17 bring it up to code and get insurance and move back in and that
18 he had a child on the way -- child had a parenthesis quotation
19 mark, child on the way in September, end quotation mark.
20 THE COURT: Mr. Dattala, is that correct?
21 MR. DATTALA: That's correct.
22 THE COURT: Okay. Thank you. Let's go on to 17.
23 MR. CHILDS: Bursey's representations in the latter
24 part of the year 2018 that his father had died when he was
25 waiting for his inheritance to come were false. And when he

1 made these representations, Bursey knew those representations
2 were false, and Bursey made those representations to induce
3 Dattala to enter into sales agreements for the 59 Sacramento
4 property.
5 THE COURT: Okay. Paragraph 18.
6 MR. CHILDS: Paragraph 18, Bursey's representation on
7 March 19th, 2019, and again on March 27th, 2019, to Dattala
8 that Bursey needed to fix the 50 Sacramento property so he
9 could bring it up to code and get insurance and move back in
10 and that he had a, quote, a child on the way in September, end
11 quote were false. When he made those representations, Bursey
12 knew those representations were false, and Bursey had made
13 those representations to induce Dattala to enter into sales
14 agreements for the 59 Sacramento property.
15 THE COURT: Okay. Very good. 19.
16 MR. CHILDS: Paragraph 19, for the purported purchase
17 of the 59 Sacramento property, Bursey presented Dattala with a
18 deed of trust in the amount of $220,000 dated April 15th, 2019,
19 with a Zillow printout and an amortization schedule at 8
20 percent interest.
21 THE COURT: Okay. Do we have that as an exhibit?
22 MR. CHILDS: Yep.
23 THE COURT: Okay. So that is the deed of trust, the
24 Zillow printout?
25 MR. CHILDS: Mm-hmm.

1 THE COURT: Is there something else there?
2 MR. CHILDS: No.
3 THE COURT: And that indicated --
4 MR. CHILDS: And an amortization schedule is attached
5 to it.
6 THE COURT: -- 8 percent --
7 MR. CHILDS: And then just for the Court's
8 edification, the two purchase agreements on the deed of trust
9 are Exhibits 1, 2 and 3.
10 THE COURT: Okay. What about the amortization?
11 MR. CHILDS: It's attached to Exhibit 3.
12 THE COURT: Okay.
13 MR. CHILDS: It was one document.
14 THE COURT: Very good. Let's go on to page 6.
15 MR. CHILDS: I'd ask Mr. Dattala to confirm that he
16 presented these documents to him.
17 THE COURT: Okay. He is your client, why don't you
18 ask him.
19 MR. CHILDS: This is for the purchase of the 59
20 Sacramento property, do you remember?
21 MR. DATTALA: Gave me amortization chart, yes.
22 THE COURT: Wait, I didn't hear what you said.
23 MR. DATTALA: The amortization chart and the -- do I
24 remember getting it? Yes, I do.
25 THE COURT: Okay.

1 MR. CHILDS: From Mr. Bursey?
2 MR. DATTALA: From Mr. Bursey.
3 THE COURT: Okay. Very good. Let's go on.
4 Paragraph 19, Mr. Childs.
5 MR. CHILDS: I read 19, I think we're on 20.
6 THE COURT: We're on 20? Oh, yes, you're correct.
7 All right.
8 MR. CHILDS: For purported purchase of the 59
9 Sacramento property, Bursey paid Dattala $10,000 purportedly as
10 an earnest money deposit on August -- sorry, April 19th, 2019.
11 So we --
12 THE COURT: And you've already asked Mr. Bursey --
13 Mr. Dattala about that; right?
14 MR. CHILDS: Right. And I have a document for that.
15 THE COURT: Okay. So you have a document.
16 MR. CHILDS: 21, Bursey knew that he did not intend
17 to purchase the 59 Sacramento property for $220,000 at the time
18 that he presented Dattala with what was purported to be $10,000
19 as an earnest money deposit on April 19th, 2019.
20 THE COURT: Okay. That's -- you have an exhibit for
21 that as well.
22 MR. CHILDS: Um-hum.
23 THE COURT: Okay.
24 MR. CHILDS: Paragraph 22, Bursey knew that he did
25 not intend to purchase the 50 Sacramento property for $220,000

1 at the time he presented Dattala with a deed of trust in the
2 amount of $220,000 dated April 15th, 2020, with a Zillow
3 printout and amortization schedule at 8.
4 THE COURT: All right. And those exhibits are
5 already above.
6 MR. CHILDS: Yeah, that's the same document.
7 THE COURT: Yes.
8 MR. CHILDS: Paragraph 23, in April 2019, Bursey
9 stated to Dattala that once Bursey receives his inheritance
10 from his father's estate he would pay Dattala the balance of
11 the purchase price for the 59 Sacramento property as the April
12 19th, 2019, $10,000 payment was just earnest money or down
13 payment until Bursey's inheritance came.
14 So, Mr. Dattala, is that what Bursey told you?
15 MR. DATTALA: That's correct.
16 THE COURT: Okay.
17 MR. CHILDS: Paragraph 24, on April -- in April 2019,
18 but prior to April 19th, 2019, Bursey stated to Dattala that
19 Bursey was waiting for money from his inheritance and would
20 rent out the properties -- would rent the properties out and
21 make payments until he'd received his inheritance.
22 THE COURT: Is that correct, Mr. Dattala?
23 MR. DATTALA: That's correct.
24 THE COURT: Okay. Thank you.
25 MR. CHILDS: Paragraph 25, in April 2019, but prior

1 to April 19th, 2019, Bursey stated to Dattala that Bursey had
2 to have a property management company come to clean up the 59
3 Sacramento property and that he needed to have documents signed
4 and notarized.
5 MR. DATTALA: That is correct.
6 THE COURT: That is correct, Mr. --
7 MR. DATTALA: Yes.
8 THE COURT: Just for the record, Mr. Dattala is
9 confirming that.
10 MR. DATTALA: Yes.
11 THE COURT: All right. Let's go on to 26.
12 MR. CHILDS: Bursey arranged for Dattala to sign two
13 documents on April 5th, 2019, being represented as a warranty
14 deed and a deed of trust and then Bursey had Dattala
15 acknowledge his signatures on those documents to Bonita
16 (phonetic) Spencer, Spencer herein, a Nevada Notary Public on
17 the same date. So do you remember doing that?
18 MR. DATTALA: That is correct.
19 THE COURT: Wait, what was the question? Do you
20 remember --
21 MR. CHILDS: Do you remember doing that?
22 MR. DATTALA: Yes.
23 MR. CHILDS: The representation from Bursey about why
24 he wanted you to sign these documents?
25 MR. DATTALA: Yes.

1 THE COURT: And did -- was -- did a Bonita Spencer or
2 Ms. Spencer serve as a notary public on that day?
3 MR. DATTALA: Yes.
4 THE COURT: What are your exhibits, Mr. Childs? I
5 want that as well please.
6 MR. CHILDS: Okay. Well, that might be -- I can have
7 this document, but the thing on that is Bonita Spencer's
8 testimony that the documents that were recorded were not the
9 documents that she notarized.
10 THE COURT: Okay. And do we have anything?
11 MR. CHILDS: I have her original deposition
12 transcript.
13 THE COURT: Okay. No, I'm not doubting it.
14 MR. CHILDS: Yes, yes.
15 THE COURT: I just want to make sure we have that.
16 Okay. Let me just write a note. So that's from the original
17 depo transcript. So when we're at lunch, you can make sure
18 that the ones that we don't have right now.
19 MR. CHILDS: I got it.
20 THE COURT: Okay. Let's go -- so we are on 27 now.
21 MR. CHILDS: 27. Dattala did not --
22 THE COURT: And also for the record, Mr. Dattala has
23 confirmed that.
24 But I think it's good to have that as an exhibit,
25 Mr. Childs. Go on.

1 MR. CHILDS: Sure.
2 THE COURT: 27.
3 MR. CHILDS: Dattala did not know and was never told
4 that Bursey intended to attach the signature page from one of
5 the documents Dattala had signed and acknowledged to Spencer on
6 April 5th, 2019, do a quick-claim deed and that Bursey intended
7 to and did record that quick-claim deed to attempt to obtain
8 record title to the 50 Sacramento property.
9 THE COURT: Is that correct?
10 MR. DATTALA: Yes, it is.
11 THE COURT: Okay. Thank you, Mr. Dattala.
12 MR. CHILDS: 28, Dattala did not know and was never
13 told that Bursey intended to attach the signature page from one
14 of the documents Dattala had signed and acknowledged to Spencer
15 on April 5th, 2019, to a deed of reconveyance and that Bursey
16 intended to and did record that deed of reconveyance to attempt
17 to remove the lien created by the deed of trust described in
18 paragraph 14 above which deed of trust encumbered title to the
19 50 Sacramento property.
20 THE COURT: And, Mr. Childs, do you have anything in
21 your exhibits that evidences this --
22 MR. CHILDS: Deed of reconveyance?
23 THE COURT: -- deed of reconveyance?
24 MR. CHILDS: Yeah, it's in Bonita Spencer's
25 deposition.

1 THE COURT: Okay. Okay.
2 MR. CHILDS: It's an exhibit and I asked her are
3 those the documents that you --
4 THE COURT: No, no, I'm not doubting you.
5 MR. CHILDS: Yes, I know.
6 THE COURT: I'm trying to make a proper record and
7 make sure that I have the proper exhibits. That's it.
8 MR. CHILDS: Okay. I'm -- I got to back myself down.
9 It's a real emotional thing for me.
10 THE COURT: I know. I know. But you don't have to
11 worry, I want to make sure we have an airtight record here;
12 okay?
13 MR. CHILDS: Me too. You're the second most
14 motivated person here.
15 THE COURT: Perhaps the first, believe it or not.
16 Okay. Go on.
17 MR. CHILDS: Paragraph 29, Bursey forged Dattala's
18 signature on a document entitled notice of purchase purportedly
19 dated April 1st, 2019, in an attempt to justify why Dattala
20 would accept a total amount of $10,000 from Bursey for the
21 purported purchase of the 50 Sacramento property when Dattala
22 was entitled to receive payments under the deed of trust
23 described in exhibit -- in paragraph 14 above.
24 THE COURT: Okay.
25 MR. CHILDS: So let me make a note of that.

1 THE COURT: So I think this one we need the notice of
2 purchase?
3 MR. CHILDS: Yes.
4 THE COURT: Okay. Let's go to 30.
5 MR. CHILDS: On April 29th, 2019, Bursey and Medina
6 conspired to further Bursey's fraudulent scheme by forging
7 Dattala's signature on two documents titled affidavit of
8 grantor purporting to state that Dattala was making numerous
9 factual representations about the title to the 59 Sacramento
10 property and it mentioned the Colusa property.
11 THE COURT: Understood.
12 MR. CHILDS: With Medina notarizing that document.
13 THE COURT: And that's going to be an exhibit that
14 we've already identified. Do you know which one that is?
15 MR. CHILDS: I sure do. Two documents titled
16 affidavit -- it's Exhibit 4 --
17 THE COURT: 4?
18 MR. CHILDS: -- page 45.
19 THE COURT: Okay. Exhibit 4, page 45. Excuse me
20 just a moment. Okay. Go on.
21 We're on paragraph 31 now.
22 MR. CHILDS: 31, Dattala did not sign the affidavits
23 of grantor described in paragraph 30 above.
24 THE COURT: Mr. Dattala, is that correct? You did
25 not sign them?

1 MR. DATTALA: Yes.
2 THE COURT: Okay. And we have these affidavits, and
3 they are exhibit -- we don't need to have two of each as long
4 as we can -- we know which exhibit it is.
5 MR. CHILDS: I think it's exhibit -- one was Exhibit
6 7 and --
7 THE COURT: Exhibit 7?
8 MR. CHILDS: Exhibit 7, and I think it's Exhibit 4 on
9 page 45 is where a lot of them...
10 THE COURT: We can go on now, and then I'm making a
11 note that we don't -- we're not certain yet which one it is.
12 MR. CHILDS: It's Exhibit 4, page 45 and 46.
13 Those --
14 THE COURT: Exhibit 4.
15 MR. CHILDS: Yeah, and the Bates page is 45 and 46 on
16 the lower right.
17 THE COURT: 45 and 46 Bates. Okay. Very good.
18 Let's go on to paragraph Number 32.
19 MR. CHILDS: 32, Medina is a notary public for the
20 State of Nevada, and she produced what she represented to be a
21 true, correct and complete copy of her notary book associated
22 with Dattala's purported signatures on the affidavits of
23 grantor described in paragraph 30 above.
24 THE COURT: Okay. And we have this exhibits already.
25 Okay. And that is exhibit?

1 MR. CHILDS: Exhibit 5, page 89 and also --
2 THE COURT: Do you want to tab those so you don't
3 have to keep going back, page 89? I have Post-its if you want
4 to tab them.
5 MR. CHILDS: Oh no, I have them.
6 THE COURT: Okay. So that's Exhibit 5, page 89.
7 That way you don't have to keep looking for them once we're
8 done.
9 MR. CHILDS: And the document your Madam Clerk here,
10 I have the document that was filed on June 3rd, 2019, is the,
11 really, perhaps, the most key.
12 THE COURT: Okay.
13 MR. CHILDS: Because --
14 THE COURT: We're already -- we've already --
15 MR. CHILDS: Discussed it.
16 THE COURT: Yes. Okay. Very good.
17 MR. CHILDS: But I have it.
18 THE COURT: All right. Let's keep going. 33.
19 MR. CHILDS: 33, Medina purportedly provided a copy
20 of her notary book to support her own affidavit, and WFG
21 provided that affidavit to Bursey, and that copy was filed with
22 the court by Bursey's attorney on June 3rd, 2019, to contradict
23 Dattala's statements about not signing the affidavits of
24 grantor described in paragraph 30 above.
25 THE COURT: Okay. So that was 33. And let's go

1 to --
2 MR. CHILDS: The rest of it has to do with Medina.
3 If we can skip down to 41 --
4 THE COURT: We can. Let me just take a look and make
5 sure that none of those have to do with Mr. Bursey. 39 talks
6 about Bursey.
7 MR. CHILDS: It is not of the signature of either
8 Bursey -- her notary book does not --
9 THE COURT: Okay. All right. Let's go to -- did you
10 say 41?
11 MR. CHILDS: 41, I think.
12 THE COURT: Okay. Let's go to paragraph 41.
13 MR. CHILDS: Without an escrow or title insurance,
14 Bursey recorded quick-claim deeds for the subject properties as
15 set forth below. A, for the 50 Sacramento property quick-claim
16 deed recorded April 8th, 2019, as set forth in paragraph 27
17 above. Bursey attached the signature pages from one of the
18 documents Dattala signed and acknowledged to Spencer on April
19 5th, 2019, to the quick-claim deed Bursey recorded in an
20 attempt to obtain title to the 50 Sacramento property.
21 B, for the 59 Sacramento property, quick-claim deed
22 recorded April 22nd, 2019. C, and then C is --
23 THE COURT: Let me just ask you this. Do you have a
24 copy of those quick-claim deeds?
25 MR. CHILDS: Yes.

1 THE COURT: Okay. I'd like those as part of this
2 evidence. Let's -- and they're consistent with paragraph 41.
3 So two quick-claim deeds for the relevant two properties 50
4 Sacramento property and 59 Sacramento.
5 MR. CHILDS: Mm-hmm.
6 THE COURT: Okay. Go on. Let's go to 42.
7 MR. CHILDS: Ownership and financial issues regarding
8 the Colusa property were resolved. I think this is important
9 to have on the record.
10 THE COURT: Correct.
11 MR. CHILDS: By findings of fact and conclusions of
12 law and judgment filed in this case on October 15th, 2020.
13 THE COURT: All right.
14 MR. CHILDS: 43, Dattala was tricked and defrauded
15 into signing the quick-claim deed for the 59 Sacramento
16 property to Bursey, and plaintiff received only the payment set
17 forth in the table below from Bursey.
18 THE COURT: Okay.
19 MR. CHILDS: And then this is this --
20 THE COURT: Is that correct, Mr. Dattala?
21 MR. DATTALA: Yes, it is.
22 THE COURT: Okay. Thank you.
23 MR. CHILDS: And then this is referring to a table
24 that's on the top of page 10.
25 THE COURT: Yes.

1 MR. CHILDS: That sets forth how much was received
2 and how much he was --
3 THE COURT: We already have a record of that; right?
4 MR. CHILDS: Yeah, (indiscernible).
5 THE COURT: But this applies to Mr. Bursey, not just
6 Ms. Medina.
7 MR. CHILDS: Well, it goes to Medina somewhat to
8 establish the damages. And 44, based on the purchase contract
9 drafted by Bursey, Dattala should have received a total of
10 $370,000 for the 50 Sacramento and the 59 Sacramento
11 properties, but instead received $10,000 in earnest money from
12 down payments and 440 -- $4,467 in principal and $9,976 in
13 interest.
14 THE COURT: Okay.
15 MR. CHILDS: Dattala should have received a total of
16 $152,263 based on the declaration of value forms for the 50
17 Sacramento property and the 59 Sacramento property which
18 statements were made under penalty of perjury, executed by
19 Bursey or Bursey's agent and attached to the recorded
20 quick-claim deeds.
21 THE COURT: And, again, Mr. Dattala has confirmed
22 that and you have the quick-claim deeds?
23 MR. CHILDS: Mm-hmm.
24 THE COURT: Okay. Let's go on to 45.
25 MR. CHILDS: As to the 50 Sacramento property, Bursey

1 immediately transferred his interest to Precision Assets, LLC,
2 by grant bargain and sale deed recorded April 15th, 2019,
3 purportedly for $95,000.
4 And then 46, as to the 50 Sacramento property despite
5 having no record title or other ownership interest -- well,
6 this is talking about Precision Assets.
7 THE COURT: All right. So 45 is as well.
8 MR. CHILDS: Well, 45 is that Bursey immediately
9 transferred his interest --
10 THE COURT: Right.
11 MR. CHILDS: -- that he received but then 46 is
12 talking about Precision Assets doing other things, and it
13 doesn't affect the claim.
14 THE COURT: Right. So let's go to 47.
15 MR. CHILDS: 47, as to the 59 Sacramento property,
16 Bursey immediately transferred his interest to Precision Assets
17 by grant bargain and sale deed recorded May 2nd, 2019,
18 purportedly for $130,000.
19 THE COURT: Do you have that?
20 MR. CHILDS: Yeah.
21 THE COURT: Okay.
22 MR. CHILDS: 48, Dattala seeks to impose a
23 constructive trust on -- well, I don't know if we need to go
24 into any of that. Let's see.
25 THE COURT: We do have 49 there.

1 MR. CHILDS: Yeah, and 48 talks about a constructive
2 trust, and I don't think we need that for purposes of this --
3 THE COURT: No.
4 MR. CHILDS: -- proceeding. Thank you.
5 THE COURT: I don't believe so.
6 MR. CHILDS: Bursey -- 49, Bursey and Medina engaged
7 in concerted action intended to accomplish an unlawful
8 objective for the purpose of harming plaintiff.
9 THE COURT: Correct.
10 MR. CHILDS: And so I think we go right to 57 because
11 first and second causes of action are declaratory relief
12 regarding the title to the property. So 50 --
13 THE COURT: Hold on, let me go to 57. All right. So
14 this is the third cause of action, fraudulent conveyance.
15 MR. CHILDS: Right.
16 THE COURT: We are -- first one is just the general
17 paragraph. 57 starts -- paragraph 57 starts on page -- line 14
18 of page 12 of the second amended complaint.
19 MR. CHILDS: Yes. Bursey never paid claimant the
20 full amount due to plaintiff -- claimant and plaintiff never
21 received the full amount due to him from Bursey for the sale of
22 the subject properties.
23 THE COURT: That is correct, Mr. Dattala?
24 MR. DATTALA: Yes, it is.
25 THE COURT: Okay. Is that correct, Mr. Dattala?

1 MR. DATTALA: Yes.
2 THE COURT: Okay. Let's go to 58.
3 MR. CHILDS: When Bursey transferred his interest in
4 the 50 Sacramento property on April 15th, 2019, it was with
5 actual intent to hinder, delay or defraud plaintiff.
6 And 59 is when Bursey transferred his interest in the
7 59 Sacramento property on May 2nd, 2019, it was with the actual
8 intent to hinder, delay or defraud plaintiff. Then 60 is
9 plaintiff suffered damages as a result of Bursey's actions.
10 THE COURT: Which we're proving at this time.
11 MR. CHILDS: Yep.
12 THE COURT: All right. Let's go to the fourth cause
13 of action which starts on page 12 at paragraph 23, civil
14 conspiracy.
15 MR. CHILDS: Yeah, paragraph 61 and that's the
16 first -- paragraph 61 is the reallegation paragraph.
17 THE COURT: Understood.
18 MR. CHILDS: 62 is the forged affidavits of grantor
19 described in paragraph 3 above -- 30 above are evidence of the
20 concert of action between Bursey and Medina.
21 THE COURT: And we already have that; correct?
22 MR. CHILDS: Yes.
23 THE COURT: All right. Let's keep going.
24 MR. CHILDS: 63, Bursey and Medina engaged in
25 concerted action to allow Bursey to sell the 50 Sacramento

1 property and the 59 Sacramento property using an escrow and
2 title insurance as described above.
3 THE COURT: Correct.
4 MR. CHILDS: 64 is the concerted action engaged in by
5 Bursey and Medina was intended to accomplish an unlawful
6 objective for the purpose of harming plaintiff.
7 And 65, plaintiff was damaged by the acts or acts of
8 Bursey and Medina, and the plaintiff has suffered and will
9 suffer general and consequential damages in excess of $15,000
10 exclusive of costs of interest in an amount to be determined
11 according to proof at trial.
12 THE COURT: Okay.
13 MR. CHILDS: And then 66 is the attorney -- request
14 for attorney's fees and costs.
15 THE COURT: Correct. All right. Let's go to the
16 fifth cause of action, negligence per se. That starts on page
17 13.
18 MR. CHILDS: Yeah, that just has to do with Medina.
19 THE COURT: Okay. So that just has to do with
20 Ms. Medina, correct.
21 MR. CHILDS: So I think we skip to 84.
22 THE COURT: Let's -- as to Bursey, third cause of
23 action is as to Bursey on page 12 with -- wait, I'm sorry. I
24 need to move it to a different page.
25 MR. CHILDS: I think we need to skip to page 15; it's

80, paragraph --

THE COURT: Let me just have a sec. Sixth cause of action -- oh, that's defendant. Okay. So seventh cause of action, RICO, as to Bursey and Medina.

MR. CHILDS: Right.

THE COURT: That starts at page 15 is paragraph 83, and it starts at line 26.

MR. CHILDS: Right. And 83 is the reallegation paragraph.

THE COURT: Yes.

MR. CHILDS: 84 is defendant Bursey engaged in criminal enterprise with at least one other individual and engaged in criminal activity by knowingly making false representations of fact to commit fraud on plaintiff.

THE COURT: Right.

MR. CHILDS: Forging plaintiff's signature on real estate and financial documents and placing forged documents in the public record, committing perjury by executing and recording a false declaration of value forms and conspiring with Medina as a notary public to fabricate signatures on documents to sign and stamp real estate documents with notary seals.

THE COURT: Do we have the -- just maybe we do but I just want to be sure. Do we have the false declaration of value forms?

1 MR. CHILDS: Yeah.
2 THE COURT: Okay.
3 MR. CHILDS: They're attached to the deeds.
4 THE COURT: Very good.
5 MR. CHILDS: With notary seals to give the document
6 the appearance of authenticity, genuineness and enforceability.
7 THE COURT: All right.
8 MR. CHILDS: Defendant Medina engaged in criminal
9 enterprise -- and let's see.
10 THE COURT: This is what, 85?
11 MR. CHILDS: 85.
12 THE COURT: It does say that with Mr. Bursey --
13 MR. CHILDS: Yeah, with at least one other individual
14 by engaging in criminal activity with Bursey.
15 THE COURT: Mm-hmm.
16 MR. CHILDS: By falsely notarizing real estate
17 documents in violation of NRS 240.001 to 240.169 inclusive
18 where regulation or order adopted or issued pursuant thereto by
19 forging Dattala's signature in notary book and by committing
20 perjury by executing the affidavits described in paragraphs 34
21 and 35.
22 THE COURT: Okay. Let's go to 86.
23 MR. CHILDS: 86.
24 THE COURT: Is this specifically -- this is about --
25 MR. CHILDS: This is about Medina.

1 THE COURT: -- Medina, yeah.
2 MR. CHILDS: But maybe it's important because it's a
3 conspiracy charge.
4 THE COURT: It is a conspiracy charge, so you are
5 correct.
6 MR. CHILDS: So I'd like to read it. We've come this
7 far. NRS --
8 THE COURT: You know, we have read that. We --
9 MR. CHILDS: Okay. I'm fine with just --
10 THE COURT: For the conspiracy charge, for the
11 record, at --
12 MR. CHILDS: This is the RICO charge, I'm sorry.
13 THE COURT: The RICO charge. Okay.
14 MR. CHILDS: We've read it into the record.
15 THE COURT: We've read it into the record, but I just
16 want to make a record of that so.
17 MR. CHILDS: Okay.
18 THE COURT: So the seventh cause of action, RICO,
19 R-I-C-O, from paragraphs 83 to paragraphs 93 involve both
20 defendant Medina and Bursey when during this prove-up hearing
21 Mr. Childs has already read all of those paragraphs which
22 includes -- it begins at 83 all -- 83, 4, 85, 86, 87, 88, 89,
23 90, 91, 92, 93 into the record when doing -- during the
24 prove-up section or the prove-up time for Ms. Medina but
25 this -- every one of those paragraphs has been read into the

1 record and also apply to Defendant Bursey. I think we can move
2 forward with -- after that record; okay?
3 MR. CHILDS: Okay. So that's all I have on Bursey.
4 I would like to make, perhaps, an argument --
5 THE COURT: Go ahead.
6 MR. CHILDS: -- if you will allow it.
7 Well, these are going to establish damages which I
8 think we agreed was $370,000 less 10 that Mr. Dattala admits
9 receiving which would be $360,000 less $4,467 --
10 THE COURT: Four thousand --
11 MR. CHILDS: $467.
12 THE COURT: $4,467 which was --
13 MR. CHILDS: Principal.
14 THE COURT: -- principal.
15 MR. CHILDS: Principal that my client paid.
16 THE COURT: Okay.
17 MR. CHILDS: So that leaves damages of $3,5 -- strike
18 that, $355,533 of actual --
19 THE COURT: $355,000 --
20 MR. CHILDS: 533.
21 THE COURT: -- 533. I'm just going to make sure that
22 this -- that I do the calculation --
23 MR. CHILDS: Absolutely.
24 THE COURT: -- you know, the Court does this
25 calculation as well because we always do before a prove-up

1 hearing. This is a bit different. And then is this the amount
2 that was paid for 11 months?
3 MR. CHILDS: No, that includes -- that's what the
4 400 -- $4,467 was the principal part of those $1443 payments.
5 THE COURT: For 11 months?
6 MR. CHILDS: For 11 months.
7 THE COURT: Okay.
8 MR. CHILDS: And $9,976 is interest.
9 THE COURT: Hold on one sec, one second. And that is
10 the -- all right. Go on. And then the balance?
11 MR. CHILDS: So I think the balance is $355,533 --
12 THE COURT: Will you repeat that, please.
13 MR. CHILDS: 355,000.
14 THE COURT: 355,000.
15 MR. CHILDS: $533.
16 THE COURT: Okay. And then --
17 MR. CHILDS: That's my --
18 THE COURT: -- the portion of interest --
19 MR. CHILDS: It's factored in there.
20 THE COURT: For the 11 months? It is; is that
21 correct?
22 MR. DATTALA: Yes.
23 MR. CHILDS: Well, interest, I don't think is --
24 THE COURT: Mr. Bursey?
25 MR. CHILDS: I don't think they should get a credit

1 for.
2 THE COURT: Mr. Dattala, forgive me.
3 MR. CHILDS: I don't think they should get a credit
4 for the interest because that was not a reduction of principal.
5 THE COURT: Correct. And this is fraudulent so --
6 MR. CHILDS: Yeah.
7 THE COURT: Okay. Very good. I agree with you, they
8 can -- I would. I think that's reasonable. It's part of the
9 sanction; okay? All right. Go on.
10 MR. CHILDS: So this is the actual compensatory
11 damages that my client is seeking. And then the RICO
12 statute --
13 THE COURT: Gives you triple damages.
14 MR. CHILDS: -- imposes triple damages.
15 THE COURT: That's right.
16 MR. CHILDS: There you go. And so I don't even need
17 to get to fraud NRS 42.001 punitive damages because the RICO
18 damages --
19 THE COURT: Your -- the RICO is going to be the
20 troubled one --
21 MR. CHILDS: The same.
22 THE COURT: -- because we're not going to go into
23 RICO, trouble and punitive.
24 MR. CHILDS: Right.
25 THE COURT: You don't need to --

1 MR. CHILDS: No.
2 THE COURT: -- because you may be doing better with
3 the RICO.
4 MR. CHILDS: It's fine.
5 THE COURT: And that's a tried and true statute which
6 I've used many times in the past as a prosecutor. Okay.
7 So I want to do -- why don't we do this. Do you --
8 I'd like you to make sure that you -- if you need more of
9 these --
10 MR. CHILDS: No, I got them.
11 THE COURT: -- so that we go through and each of
12 the -- you mark -- they're marked so that Madam Clerk can -- it
13 doesn't become, you know, confusing too.
14 MR. CHILDS: I'll be as efficient as possible.
15 THE COURT: Very good, but I mean, this is a unique
16 situation; right? Because we've just been -- I have a list of
17 what I believe as well. And then I want a -- I will be
18 calculating --
19 MR. CHILDS: Okay.
20 THE COURT: -- with respect of what -- and so
21 granted. It's granted.
22 MR. CHILDS: Thank you.
23 THE COURT: Okay. But --
24 MR. CHILDS: And so I talked to client, these are
25 such huge numbers that he waives the attorney fees and costs

1 because that's going to, literally, take me five hours.
2 THE COURT: I know.
3 MR. CHILDS: And so he's waiving --
4 THE COURT: But that's the case, you know, that's --
5 MR. CHILDS: -- so he's waiving that so.
6 THE COURT: Okay. Are you sure?
7 MR. DATTALA: Yeah, it's going to take him that long.
8 It's going to probably going to cost me that much anyway.
9 THE COURT: All right.
10 MR. CHILDS: Because it's such a large amount anyway.
11 THE COURT: I understand. I understand that, but I
12 mean, you have a right. I mean, Mr. Dattala has a right.
13 MR. CHILDS: Yes.
14 THE COURT: And I agree that that will be a lengthy
15 exercise given this case. So the attorney's fees are waived.
16 MR. CHILDS: And the costs.
17 THE COURT: Okay. So for the record, Mr. Dattala has
18 waived the attorney's fees and costs --
19 MR. CHILDS: Just against these two defendants.
20 THE COURT: -- against Mr. Bursey and Ms. Medina
21 only. Okay.
22 MR. CHILDS: Thank you.
23 THE COURT: Let me -- I -- let's go -- here's what --
24 MR. CHILDS: Do you want to take 40 minutes or?
25 THE COURT: Here's my -- yeah. Let's do that. Let's

1 take about 40 minutes, 40 to 45. Please get all of the --
2 everything in line yourself, before you present it to the clerk
3 because that way it would be quicker, I think. And then you
4 will need to -- you have an order from the Court; you just need
5 to up --
6 MR. CHILDS: Prepare.
7 THE COURT: -- memorialize it in writing if you put
8 it into an -- everything. If I receive it today or tomorrow,
9 I'll sign it right away.
10 MR. CHILDS: Yeah, because I'm just going to copy and
11 paste these.
12 THE COURT: That's all you have to do. I mean, I'm
13 not -- I can't tell you what to do, but I mean, that's
14 reasonable.
15 MR. CHILDS: And I'll give the clerk her own
16 (indiscernible).
17 THE COURT: But it is important to have all those
18 details. That's one thing that -- however you do it.
19 MR. CHILDS: I'll give the clerk an evidence book
20 when we come back and we'll go over it.
21 THE COURT: Perfect.
22 MR. CHILDS: It will be real quick.
23 THE COURT: And then it's a wrap after that.
24 MR. CHILDS: Okay.
25 THE COURT: Okay. So we're taking 45 minutes and

1 we'll be back -- what time, Perry (phonetic)?
2 THE MARSHAL: I'll calculate it. Quarter after
3 (indiscernible).
4 THE COURT: I'm sorry?
5 THE MARSHAL: Yes. It's 23 right now plus 45.
6 THE COURT: Let's say it's 25; okay?
7 THE MARSHAL: So eight after.
8 THE COURT: Okay. So let's try to get here at five
9 after if we can.
10 MR. CHILDS: Well, can I work in here or?
11 THE COURT: He can work in here.
12 THE MARSHAL: Yes, sure.
13 THE COURT: It's fine, it's fine. Okay.
14 (Court recessed 2:24 p.m., until 3:25 p.m.)
15 THE COURT: Mr. Childs is here with his client,
16 Mr. Dattala, and we are going over the exhibits that are going
17 to be -- that have been introduced for the purposes of the
18 default judgment hearing -- the prove-up hearing against
19 defendants Medina and Bursey. All right.
20 So that's number -- so let's start with Number 1 it's
21 going -- that's been offered is the affidavits of the grantor.
22 Is there anything that specifically puts -- what is it -- what
23 date is that? Does it have a date or?
24 MR. CHILDS: Yes, it has a date. April 29th, 2019.
25 THE COURT: Okay. April 29th of 2019. Okay.

1 Then Number 2 is a -- Exhibit Number 2 is a copy of
2 Medina's notary book attached to the June 3rd, 2019, filing for
3 the purposes of this is Exhibit Number 2.
4 MR. CHILDS: And this was Exhibit C to that filing.
5 THE COURT: Okay.
6 MR. CHILDS: Just to be as clear as possible. And so
7 I have the entire filing. You just want me to get rid of
8 everything else except for Exhibit C?
9 THE COURT: Yes.
10 MR. CHILDS: Good.
11 THE COURT: That's fine.
12 MR. CHILDS: Okay.
13 THE COURT: We don't need the expert pages.
14 MR. CHILDS: There you go.
15 THE COURT: Okay. So just tab that as Number 2.
16 Now, Exhibit Number 3 I show, Mr. Childs, is a copy
17 of the notary book or something on June 3rd of 2019, I believe.
18 MR. CHILDS: Yes.
19 THE COURT: What is it? Can you please describe it.
20 MR. CHILDS: That's an affidavit that Lillian Medina
21 signed.
22 THE COURT: Wait, this is Exhibit Number 3?
23 MR. CHILDS: Mm-hmm.
24 THE COURT: I have copy of notary's something June
25 3rd, 2019. So what is that?

UNIDENTIFIED SPEAKER: That was Number 2.

THE COURT: That was Number 2? No, that was -- Number 2 is a copy of Ms. Medina's notary book. I just don't know if this was a different affidavit. Number 3 is?

MR. CHILDS: Yes, it's a different affidavit.

THE COURT: Okay. That's what I thought. And if you can describe that and place a Post-it on that, please. You can tell me the date or the name of the affidavit.

MR. CHILDS: Yeah, it's -- at the top it says notice exclamation point, a separate affidavit must be completed for each filer.

THE COURT: All right. Will you please place a Post-it on that as Exhibit Number 3 to this preceding.

MR. CHILDS: Yep.

THE COURT: Let's go now to Exhibit Number 4. And that came up with -- when you're reviewing paragraph 34 with respect to Ms. Medina. I show it as other affidavits of Ms. Medina filed in a document by WFG. No. No. That's underneath. Other affidavits by Ms. Medina and that came up with paragraph 34. Do you have it, Mr. Childs?

MR. CHILDS: I do.

THE COURT: Okay.

MR. CHILDS: But I'm --

THE COURT: And if you could just describe those. If it's more than one just put a -- if -- do you need a paper

clip; we have them. And just make sure to put a Post-it that says Exhibit 4 on those, please.

MR. CHILDS: Okay. Just give me a second to get it organized a little. I think that's the same as Exhibit 3.

THE COURT: Are you positive?

MR. CHILDS: Because that says April 29th.

THE COURT: Exhibit 3 --

MR. CHILDS: Oh, no, hold on. That's --

THE COURT: This is an affidavit --

MR. CHILDS: Yeah, that's a different --

THE COURT: -- dated 29th. I think it's a different one from what I understood. That she complied with all the applicable state and local laws concerning Bursey's signature on the affidavit of grantor described in paragraph 30.

MR. CHILDS: I have it. Thank you.

THE COURT: You have that? Okay. And that's Number 4; okay.

Now let's go to Exhibit Number 4 is something that we came upon in paragraph 34 as well. And that is -- okay. No, we just did Number 4, forgive me. Okay.

Number 5. This is -- came up with -- during the Medina portion, an affidavit dated June 3rd falsely stating that she had complied with all applicable state and local laws concerning Dattala's signature on the affidavits of grantor described in paragraph 30.

1 MR. CHILDS: Yeah, that's the same one as Exhibit 3.
2 THE COURT: Exhibit 3 and also -- okay. So that's
3 the same.
4 MR. CHILDS: Yeah.
5 THE COURT: So we don't -- so we don't need a five.
6 Okay. No Exhibit 5. All right. Exhibit --
7 Wait, no, we need a five. It's just isn't -- that's
8 not going to be it; right?
9 MR. CHILDS: Right. Mm-hmm.
10 THE COURT: So Exhibit 5 now. And that -- let's see.
11 I show -- all right. So we don't need the one that was there
12 before, it's already in -- I show here that it was a filed
13 document WFG that there was a uninsured quick-claim deed.
14 MR. CHILDS: Yeah, that -- it's Exhibit 3.
15 THE COURT: 3 or 1?
16 MR. CHILDS: It's Exhibit 3, the June 3rd affidavit.
17 THE COURT: Okay. All right. As long as we have
18 everything that we need. All right.
19 MR. CHILDS: I think --
20 THE COURT: So let me just mark that off. Hold on.
21 Now, let's move forward and I think the -- when we
22 were at paragraph 40 -- let me just see. I believe in an
23 effort to cover up her violation --
24 MR. CHILDS: Yep.
25 THE COURT: -- of the statute, Medina either forged

or had someone forge Dattala's signature in her notary book. So what exhibit is that? Is that in Number 2?

MR. CHILDS: No, that'd be 5. No, it's a separate thing.

THE COURT: This is a separate one? Okay. Five is -- and what is it exactly?

MR. CHILDS: It's a excerpt from Medina's notary book.

THE COURT: Okay. And what page is it in that book; do you know?

MR. CHILDS: It's page 96.

THE COURT: Okay. That's very good. That gives us more -- as specific as we can be is good; right?

MR. CHILDS: Yeah. You'll see when you look at it why I'm --

THE COURT: I know, but -- so will you mark that --

MR. CHILDS: Yep.

THE COURT: -- will you place a Post-it? Do you have enough Post-its?

MR. CHILDS: Mm-hmm.

THE COURT: Okay.

MR. CHILDS: I'm good.

THE COURT: Okay. Excerpt from Medina's notary book. Okay. Let's keep going. Now, we have -- all right. We have something that came up during paragraph 43, which was at the

1 top of the page, and this is the -- excuse me, just a moment.
2 Dattala was tricked and defrauded by signing the
3 quick-claim deed for the 59 Sacramento property. So here, I
4 believe, we have two purchase agreements as -- now it's going
5 to be Exhibit Number 6, this is 6 now. Two purchase
6 agreements; one for 50 Sacramento and two -- and the second one
7 is for -- why don't we make that 6 and 7?
8 MR. CHILDS: Yeah.
9 THE COURT: Okay. So the purchase agreement for 50
10 Sacramento is Exhibit 6. Let's write that down. Okay. And
11 Number 7, Exhibit Number 7, is the purchase agreement for 59
12 Sacramento; okay. So are you placing those --
13 MR. CHILDS: Yep, I'm --
14 THE COURT: -- in order with your Post-its? Okay.
15 Very good.
16 MR. CHILDS: -- looking for them.
17 THE COURT: Let's move on now to Number 8. This
18 came -- this was evidence of the 10,000 paid. So that's going
19 to be Exhibit Number 8. And what evidence -- which evidence of
20 the $10,000 earnest money paid by Mr. Bursey to Mr. Dattala;
21 correct?
22 MR. CHILDS: Yep.
23 THE COURT: Okay. And so that's going to be Number
24 8; okay.
25 Let's go to Number 9 now. Lucky I take good notes.

1 Okay. Now, Number 9 is evidence, Mr. Childs, of the $4,467
2 that Mr. Bursey paid over 11 months to Mr. Dattala -- no, yes.
3 Okay. Sorry. All right. And there's also evidence of $9,976
4 in interest which I am going to not allow be counted as part of
5 the default judgment penalties; okay.
6 MR. CHILDS: Okay. I don't have --
7 THE COURT: But I would like --
8 MR. CHILDS: I don't have any written evidence of the
9 payments.
10 THE COURT: Well, we have the evidence that came in
11 through the testimony of Mr. Dattala.
12 MR. CHILDS: Right.
13 THE COURT: Okay. So that's not -- those are not
14 coming in; right? But we know in the calculation that that's
15 there, that it's 9,976 -- $4,467 total paid over 11 months that
16 were applied to principal; $9,976 over 11 months were applied
17 to interest, and this Court is disallowing those interest
18 payments because of the fraud involved as a -- as part of a
19 default judgment penalty. All right.
20 Let's move on and go to -- just give me one moment.
21 All right.
22 When we were discussing -- okay. So -- that -- I
23 just have a definition for myself what -- All right.
24 Let's go next to paragraph 61, Mr. Childs. No. Oh,
25 and also those payments that we just discussed, the $4,467

1 principal and the interest, that was discussed in paragraph 8
2 or 9, I believe, paragraph 9. Okay.
3 Then let's go to paragraph 61; that's the next one
4 that I show for Ms. Medina. 61, again, we are just addressing
5 Ms. Medina at this time. And so we'll overlap. One moment.
6 Okay. 61 is with the -- originates under the fourth cause of
7 action on page 12, civil conspiracy.
8 And after the reallegation paragraph, we go to 62,
9 the forged affidavits of grantor described in paragraph 30.
10 Do we need a new exhibit for that or is it something
11 else?
12 MR. CHILDS: No, I think that's Exhibit 1.
13 THE COURT: Okay. That's what I think. Okay. So no
14 more exhibit there.
15 Then we go to 66. That was the attorney's fees and
16 costs under *Brunzell* and *Cadle*, and you've decided to waive
17 that?
18 MR. CHILDS: Yeah, Mr. Dattala.
19 THE COURT: Mr. Dattala, you've waived the attorney's
20 fees and costs; is that correct?
21 MR. DATTALA: Yes.
22 THE COURT: Okay. So those are not going to be
23 included here. And you have a right to do that.
24 Now, let's start with the information with respect to
25 the second part of this hearing which has to do with

1 Mr. Bursey. I show that when we were reviewing paragraph 14, I
2 have the purchase agreement. Is that something that's come up
3 before? I don't -- oh, I do show that as 6 and 7.
4 MR. CHILDS: Mm-hmm. That's for --
5 THE COURT: Or is it different than Exhibit 6, the
6 purchase agreement for 50 Sacramento or Exhibit 7, the purchase
7 for 59 Sacramento?
8 MR. CHILDS: Oh, yeah, 56 is the purchase agreement
9 for 50 and 7 is -- actually, it's not a purchase, it's a deed
10 of trust that Mr. Bursey presented to Mr. Dattala for 59
11 Sacramento.
12 THE COURT: Okay. Do you have that deed of trust?
13 MR. CHILDS: Yeah, it's --
14 THE COURT: Okay. So that's the next exhibit. We
15 already have the purchase agreements.
16 MR. CHILDS: Well, 59 didn't have a purchase
17 agreement.
18 THE COURT: Okay.
19 MR. CHILDS: It had --
20 THE COURT: So the purchase -- so we have 6, Number 6
21 is a purchase agreement for 50 Sacramento?
22 MR. CHILDS: Yes.
23 THE COURT: But I also show that 7 is the purchase
24 agreement for 59 Sacramento; is that incorrect?
25 MR. CHILDS: Well, they were -- yes. They were

1 operating down this deed of trust that Mr. Bursey presented.
2 THE COURT: Okay. But does the purchase -- does
3 Exhibit 6, take a look at what you've tabbed as 6. 50
4 Sacramento, does that have a purchase agreement?
5 MR. CHILDS: Yes.
6 THE COURT: Okay. And that's already Exhibit 6?
7 MR. CHILDS: Yes.
8 THE COURT: Okay. Number 7 is 59 Sacramento. That's
9 not a purchase agreement?
10 MR. CHILDS: No, it's a deed of trust. I went over
11 this with Mr. Dattala.
12 THE COURT: Okay. It's a deed of trust. So I'm
13 changing Number 7, instead of a purchase agreement --
14 MR. CHILDS: Right.
15 THE COURT: -- it's a deed of trust.
16 MR. CHILDS: Right.
17 THE COURT: Will you please mark that Number 7.
18 MR. CHILDS: Yep.
19 THE COURT: And take -- okay. I need you to tab --
20 make sure you tab that for --
21 MR. CHILDS: Mm-hmm.
22 THE COURT: Okay. All right. So we don't have to
23 change anything else so far. All right.
24 Let's go now to -- hold on a second. So one's a
25 purchase agreement and one was a deed of trust.

1 Now, we go to paragraph 19 because we already have
2 the promissory notes; right?
3 Take a look at paragraph 14, Mr. Childs, line 22. It
4 says -- it starts out with the August 2nd, 2018, deed of trust
5 encumbering title to 50 Sacramento.
6 MR. CHILDS: Mm-hmm.
7 THE COURT: Is that a deed of trust also or a
8 purchase agreement?
9 MR. CHILDS: Yeah, that's a deed of trust on 50
10 Sacramento.
11 THE COURT: And 59 as well?
12 MR. CHILDS: No.
13 THE COURT: It's an extra one. So this is Number 9
14 is a deed of trust on 50 Sacramento. All right. Please tab
15 that as Number 9. Okay.
16 Then let's go to -- okay. Let's go to paragraph 19.
17 That was the next one that came up with -- when we were
18 reviewing this. 19 I show a deed of trust in the amount of 220
19 dated April 15th and attached to it is a Zillow printout and
20 amortization schedule of 8 percent. That is Exhibit 10.
21 MR. CHILDS: No, that's Exhibit 7. It's the same as
22 Exhibit 7.
23 THE COURT: Okay. So we don't need -- did it have
24 the Zillow printout and amortization as well?
25 MR. CHILDS: It's attached to it.

1 THE COURT: Okay. So see Exhibit 7. But when we
2 discussed Exhibit 7, we didn't talk about the Zillow printout
3 and amortization schedule. So I'm just drawing a little line
4 here so Exhibit 7. So this is a deed of trust in the amount of
5 $220,000 dated April 15th of 2019, with a Zillow printout --
6 MR. CHILDS: Mm-hmm. Yes.
7 THE COURT: Okay. One moment. And an amortization
8 schedule of 18 percent -- excuse me, 8 percent interest is
9 attached; correct?
10 MR. CHILDS: I don't know what the interest is.
11 THE COURT: You said -- it says right here.
12 MR. CHILDS: No, that was on 50 Sacramento.
13 MR. DATTALA: Same, same (indiscernible).
14 MR. CHILDS: Oh, was it? Okay.
15 THE COURT: This is 59.
16 MR. CHILDS: There's an amortization schedule and
17 that's all I can represent to you.
18 THE COURT: Well, you haven't given me a Zillow issue
19 and --
20 MR. CHILDS: Oh yeah, I'm sorry. I need to go page
21 before, yeah, it's 8 percent.
22 THE COURT: Okay. And this is on 59 Sacramento?
23 MR. CHILDS: Yes.
24 THE COURT: Do you have more -- do you have a Zillow
25 printout that -- in addition to the deed of trust, do you have

a Zillow printout and amortization schedule for 50 Sacramento? Because I thought that had a purchase agreement.

MR. DATTALA: No, we don't have.

THE COURT: Exhibit 6, look at Exhibit 6. Okay. So let's keep going. Okay.

So the next one is -- okay. So we have this one now.

So the next exhibit is Exhibit 10 now, the new Exhibit 10 on my list, and this is the original deposition transcript of Ms. -- excuse me just one second -- this is paragraph 26 of Ms. Bonita Spencer.

MR. CHILDS: That --

THE COURT: Yes, that was the next thing.

MR. CHILDS: Yeah. Now, Judge, I have that in a sealed document that WFG was very emphatic about --

THE COURT: To not unseal?

MR. CHILDS: Yeah. Can you bring the blah, blah, because I have it. I have -- this is a certified copy.

THE COURT: Well, let's use the certified --

MR. CHILDS: Yeah. Okay.

THE COURT: Let's not open something that we shouldn't.

MR. CHILDS: Yeah, it's --

THE COURT: And if there's a certified copy, I think that that's more than enough. I mean, that's sufficient, sufficient; okay. So it is a certified copy. What pages --

1 okay. Because I think that's important -- of Ms. Bonita
2 Spencer's deposition which was taken on what date, Mr. --
3 MR. CHILDS: October 15th, 2019.
4 THE COURT: Okay. Taken October --
5 MR. CHILDS: 15th.
6 THE COURT: -- 15th --
7 MR. CHILDS: 2019.
8 THE COURT: -- 2019. And I think it'd be important
9 if we had the salient pages.
10 MR. CHILDS: Well --
11 THE COURT: And you can tab those, please.
12 MR. CHILDS: Sure. And it's referring to Exhibits --
13 THE COURT: This was paragraph 26, and it says Bursey
14 arranged for Dattala to sign two documents on April 5th; he
15 represented as a warranty deed and a deed of trust. And then
16 Bursey had Dattala acknowledge his signatures on those two
17 documents to Bonita Spencer, a Nevada notary public on the same
18 day.
19 Mr. Dattala did not know and was never told that
20 Bursey intended to attach the signature page from one of the
21 documents Dattala had signed and acknowledged to Spencer's
22 April 5th to a quick-claim deed and so forth.
23 So we need the deposition of --
24 You're still under oath, Mr. Dattala, and I don't
25 believe -- did you know that that page was going to be attached

1 to a quick-claim deeds?
2 MR. DATTALA: No, I did not.
3 THE COURT: Okay. So we have testimony to that but
4 where -- what pages in that -- in Exhibit 10 do we need to look
5 at that Ms. Spencer --
6 MR. CHILDS: Spencer.
7 THE COURT: -- that Ms. Spencer testified -- hold on
8 one second.
9 MR. CHILDS: Your Honor, I can clear it up real
10 quick.
11 THE COURT: Okay. Go ahead. Just tell me the page,
12 I think --
13 MR. CHILDS: Well, it's page 10 --
14 THE COURT: Okay.
15 MR. CHILDS: -- starting at line 9, and I'm asking
16 about, in the deposition, Exhibit 3 to her deposition is the
17 quick-claim deed for Nevada recorded April 8th, 2019.
18 THE COURT: Okay.
19 MR. CHILDS: And Exhibit --
20 THE COURT: So that's Exhibit 3. Let me just write
21 this down. Is to depo is -- just one moment, the --
22 MR. CHILDS: Quick-claim deed for Nevada --
23 THE COURT: -- quick-claim deed in Nevada -- for
24 Nevada?
25 MR. CHILDS: -- for Nevada.

1 THE COURT: For Nevada. Okay. I use to say Nevada
2 the way that you do --
3 MR. CHILDS: Okay.
4 THE COURT: -- because that's how it sounds in
5 Spanish and they told me not to. Okay.
6 MR. CHILDS: That's the title of the document and it
7 was --
8 THE COURT: No, no, no, the pronunciation.
9 MR. CHILDS: Okay.
10 THE COURT: Even though I speak the native language
11 but --
12 MR. CHILDS: Okay. And it -- it was --
13 THE COURT: Okay. So -- all right. So that's --
14 MR. CHILDS: -- recorded --
15 THE COURT: -- Exhibit 3.
16 MR. CHILDS: -- 4/8/2019.
17 THE COURT: 4 is --
18 MR. CHILDS: April 8th --
19 THE COURT: -- April 8th --
20 MR. CHILDS: -- 2019.
21 THE COURT: -- 2019.
22 MR. CHILDS: And Exhibit 4 is the deed of full
23 reconveyance.
24 THE COURT: Okay. Exhibit 4 to our Exhibit 10 --
25 MR. CHILDS: Yes.

1 THE COURT: -- is the deed --
2 MR. CHILDS: Of full reconveyance.
3 THE COURT: Okay. The deed of full reconveyance, and
4 that is dated?
5 MR. CHILDS: Well, it was recorded. I can -- the
6 date is April 5th, but it was recorded April 8th, 2019.
7 THE COURT: April 5th is the signature?
8 MR. CHILDS: Yes. Well --
9 THE COURT: No, no. Okay. April 5th -- what
10 happened on April 5th?
11 MR. CHILDS: He went to the -- Bonita Spencer and
12 signed --
13 THE COURT: That's when it happened. Notarized,
14 notarized on April 5th.
15 MR. CHILDS: Yeah, he signed other documents and then
16 Bursey took the signature page --
17 THE COURT: Right.
18 MR. CHILDS: -- and put it on these documents.
19 THE COURT: Okay. And it was recorded what date?
20 MR. CHILDS: April 8th.
21 THE COURT: Recorded in Nevada, Clark County?
22 MR. CHILDS: Yes.
23 THE COURT: Clark County.
24 MR. CHILDS: Yes.
25 THE COURT: April 8th of what year?

1 MR. CHILDS: 2019.
2 THE COURT: 2019. Okay. Very good. Let me just
3 grab another piece of paper. Just a moment. Okay. Is there
4 anything that's a part of that deposition --
5 MR. CHILDS: Well, I think --
6 THE COURT: -- of Ms. Spencer?
7 MR. CHILDS: I think this is the key part on
8 page 10 --
9 THE COURT: Right.
10 MR. CHILDS: -- they asked her about the document
11 separately. On page 10 she says -- I said, is this the
12 document that you notarized, referring to Exhibit 3?
13 THE COURT: Yes.
14 MR. CHILDS: And she said, well, it says quick-claim
15 deed so obviously it wouldn't be a quick-claim deed. It's not
16 what my book states.
17 THE COURT: What does her book state? What pages is
18 she -- what page did she say that on?
19 MR. CHILDS: Page 10.
20 THE COURT: It all happens on -- is the -- it starts
21 on page 10 and it ends where?
22 MR. CHILDS: It -- page 10 is where it talks about
23 where I asked her --
24 THE COURT: Right, page 10, line 9.
25 MR. CHILDS: -- to testify about the quick-claim

1 deed. And then page, I think it's --
2 THE COURT: I think if we state that it begins on
3 page 10 of the --
4 MR. CHILDS: Yeah, it begins on --
5 THE COURT: -- deposition, that's sufficient.
6 MR. CHILDS: It's only like a 15 page depo.
7 THE COURT: No, no, no, I think that's enough.
8 MR. CHILDS: Okay.
9 THE COURT: I think if we --
10 MR. CHILDS: Starting on page --
11 THE COURT: Actually, I don't even know -- I'm a very
12 detailed person. We may not -- I don't see -- I think you can
13 tell that by now. I don't even know if we have to reference
14 the page but we have. Okay.
15 THE CLERK: Judge, did you want to just me accept the
16 whole deposition and publish it that way or?
17 THE COURT: Do you want -- do you want to publish the
18 entire deposition as an exhibit?
19 MR. CHILDS: Sure. I ask that it be an exhibit.
20 THE COURT: Yes. So the deposition of Ms. Bonita
21 Spencer --
22 MR. CHILDS: Right.
23 THE COURT: -- Bonita Spencer taken October 15th of
24 2019, is Exhibit 10 in its entirety. Please make sure to
25 reference that Exhibit 3 to that deposition --

1 MR. CHILDS: And Exhibit 4.
2 THE COURT: -- is the quick-claim deed for Nevada.
3 And exhibit -- that was signed on April 8th, 2019, and
4 Exhibit 4 to the deposition is the deed of full reconveyance
5 notarized on April 5th and recorded in Clark County as April
6 8th -- on April 8th of 2019. That's important.
7 MR. CHILDS: Yes.
8 THE COURT: Okay. Let's move -- let's move on,
9 Mr. Childs. All right.
10 So now we have a deed of trust for Bonita, we already
11 have that; right?
12 MR. CHILDS: Yes.
13 THE COURT: Okay. Notice of purchase.
14 MR. CHILDS: Okay.
15 THE COURT: I show here that came up in paragraph 29.
16 MR. CHILDS: Yeah, that's Exhibit 8.
17 THE COURT: Exhibit 8? Okay. So we don't need to
18 add that.
19 MR. CHILDS: I don't think so.
20 THE COURT: No, we only need the exhibit once. All
21 right. So that's gone. All right.
22 Paragraph 30 is evidence above -- we have this
23 Exhibit 4, page 45. What is Exhibit 4, page 45 of the
24 deposition? So I can just make a record for that.
25 MR. CHILDS: No, Exhibit 4, page 45 that's one of

1 these affidavits that --
2 THE COURT: Okay.
3 MR. CHILDS: -- the deed was signed.
4 THE COURT: So we -- that's not in your exhibit?
5 MR. CHILDS: No.
6 THE COURT: All right. Are you caught up?
7 MR. CHILDS: Yep.
8 THE COURT: All right. Let's go to line -- the next
9 one that I show -- I show no, it's not necessary. I show
10 affidavit exhibits for pages 45 and 46 Bates.
11 MR. CHILDS: Yeah, those are the --
12 THE COURT: Pardon me?
13 MR. CHILDS: Those are the affidavits of Lillian
14 Medina.
15 THE COURT: Which are above; right?
16 MR. CHILDS: Yeah. Yes.
17 THE COURT: Okay. So we don't have to really review
18 that again.
19 Now, do we have when we come to paragraph 32, and
20 remember some of these -- these were already entered when we
21 discussed it's a conspiracy. So we have some that are already
22 filed that both of the defendants that needed to follow through
23 on their conspiracy. So I show paragraph 32, Exhibit 5, page
24 90 -- 89. So that's an expert -- excerpt from Medina's notary
25 book.

1 MR. CHILDS: Yeah, page 96.
2 THE COURT: Page 96?
3 MR. CHILDS: Yes.
4 THE COURT: Why don't I add that to the excerpt from
5 page 96 -- that's -- I actually have that as Exhibit 5.
6 MR. CHILDS: Me too.
7 THE COURT: Okay. So we don't have to add another
8 exhibit for that; right?
9 MR. CHILDS: Yes, we do not.
10 THE COURT: Okay. Then paragraph 33 --
11 MR. CHILDS: Do you mind if I take my coat off,
12 Judge?
13 THE COURT: No, that's fine, that's fine.
14 MR. CHILDS: We're both going to --
15 THE COURT: Believe me, I would like to take my robe
16 off because it's very warm --
17 MR. CHILDS: Thank you.
18 THE COURT: -- but I have to be very respectful of
19 the court so I can't. Okay. But I'm saying yes, you can take
20 your coat off. All right.
21 But let's keep going though because we're almost
22 done, Mr. Childs.
23 MR. CHILDS: All right.
24 THE COURT: Okay. Now, the next one I show is -- we
25 already have Exhibit 5. Now, when you go to paragraph 41

because the other one is, again, a copy of the notary log book which we already have. Paragraph 41 is -- this is the first time -- okay. This we discussed with -- concerning Mr. Bursey, and it's without an escrow title insurance, Bursey recorded quick-claim deeds for the subject properties, and it's the 50 Sacramento and 59 Sacramento.

The quick-claim deed from one of the documents that Mr. Dattala signed with Ms. Spencer was recorded -- oh, okay, for 50 Sacramento. We already have that.

MR. CHILDS: Yes.

THE COURT: And we already have the quick-claim deed that was recorded for 59. So we're not going to add another exhibit.

MR. CHILDS: Wait, I don't think we had the quick-claim deed for 59.

THE COURT: Oh, we don't?

MR. CHILDS: I think --

THE COURT: Hold on, let me see.

MR. CHILDS: Madam, did you print that out?

THE CLERK: Is that Exhibit 25?

MR. CHILDS: Yeah, that's the one I had asked your Clerk.

THE COURT: Hold on.

MR. CHILDS: Thank you.

THE COURT: Quick-claim deeds, I think we have

1 testimony. Exhibit 3 to the deposition is quick-claim deed for
2 Nevada, April 8th of 2019, and Exhibit 4 to Ms. Spencer's
3 deposition is a deed of full reconveyance.
4 MR. CHILDS: Mm-hmm.
5 THE COURT: So Exhibit 3 to our Exhibit 10, the
6 deposition of Ms. Spencer, which property is that?
7 MR. CHILDS: 50 Sacramento.
8 THE COURT: Okay. This is for 50 Sacramento.
9 And what about Exhibit 4? I have a deed of full
10 reconveyance notarized, recorded in Clark County on April 18th.
11 MR. CHILDS: Yeah, that's for 50 Sacramento too.
12 THE COURT: That's 50 Sacramento?
13 MR. CHILDS: Yes.
14 THE COURT: All right. So what do we have for 59
15 Sacramento?
16 MR. CHILDS: Well, the next in line would be
17 Number 11.
18 THE COURT: Well, wait. When we discussed -- yes,
19 you're right. It will be Number 11, but when we discussed --
20 when we were discussing this -- when we -- when you were
21 offering testimony, 41, I show Bursey quick-claim deeds,
22 paragraph 27. And then two quick-claim deeds A and B that were
23 recorded.
24 MR. CHILDS: Mm-hmm.
25 THE COURT: Do we have these anywhere else or are

1 these now Exhibit 11?
2 MR. CHILDS: No, these are unique.
3 THE COURT: Okay. Perfect.
4 MR. CHILDS: These are new.
5 THE COURT: All right. And will you -- this is a
6 quick-claim --
7 MR. CHILDS: No, this is a grant bargain and sale
8 deed. This --
9 THE COURT: I have it down as recorded quick-claim
10 deeds. That's what we -- look at paragraph 41. Look at A.
11 MR. CHILDS: Oh, I'm sorry. I apologize, Judge.
12 Yes, that's Exhibit 3 too.
13 THE COURT: Okay. So we don't need this quick-claim
14 deed again?
15 MR. CHILDS: No, that's Exhibit 3 to Bonita Spencer's
16 deposition.
17 THE COURT: Okay. What about B? For the 59
18 Sacramento property. Do we have a quick-claim deed for that?
19 MR. CHILDS: Yes.
20 THE COURT: Because I don't think that that was --
21 both of the things, Exhibit 3 and 4, to Ms. Spencer's
22 deposition have to do with 50 Sacramento, not 59.
23 MR. CHILDS: Right.
24 THE COURT: So where is the quick-claim deed for 59?
25 MR. CHILDS: Unfortunately or maybe fortunately, it's

1 attached to Lillian Medina's deposition.
2 THE COURT: Hold on. 59 is -- what page is it?
3 MR. CHILDS: Well, it's attached as exhibit --
4 THE COURT: What exhibit is it?
5 MR. CHILDS: 12.
6 THE COURT: Exhibit 12 to Ms. Medina's deposition;
7 correct?
8 MR. CHILDS: Yes. October 15th, 2019. Same day.
9 THE COURT: Okay. Deposition on October -- what
10 date?
11 MR. CHILDS: 15th.
12 THE COURT: 15th of 2019?
13 MR. CHILDS: Yes.
14 THE COURT: Is that -- is that any exhibit yet?
15 MR. CHILDS: Nope.
16 THE COURT: Okay. So we're going to introduce that.
17 Okay. That's going to be Ms. Medina's deposition taken on
18 October 15 of 2019. And Exhibit 12 is a quick-claim deed that
19 is the topic of the 59 Sacramento property; right? Is that
20 correct? Mr. Childs?
21 MR. CHILDS: Let me triple check it. Yes, that's
22 correct.
23 THE COURT: Okay. Let's go on now. We have next,
24 there's an order of this Court from October 15th of 2020.
25 Please take a look at paragraph 42. It says -- oh, that has to

do with the Colusa property, quick-claim. I don't think we need to introduce that here; okay?

MR. CHILDS: Okay.

THE COURT: That's been -- but it was a good thing you made a record, but I don't believe I need it as an exhibit.

43 is the chart. I don't know that we really need the chart because I'm going to discuss that very quickly, make a -- so I'm not going to -- I don't believe the chart needs to become part of the evidence here; okay? That will be discussed quickly when we finish above.

Paragraph 44, Mr. Childs, is also explaining the chart. So that does not need to be brought in as an exhibit except for the fact that when I discuss it, the numbers, they have to do with both properties, and I'll make a record of that.

Let's move forward. Paragraph Number 45. This is -- okay. We already have the grant bargain and sale deed recorded April 15th; right?

MR. CHILDS: I don't think so.

THE COURT: Okay. Do you have that?

MR. CHILDS: This is on 50 Sacramento.

THE COURT: This is for -- okay. Paragraph 45 as to the 50 Sacramento property, Bursey immediately transferred his interest to Precision Assets, LLC, by grant bargain and sale deed recorded April 15th, 2019, purportedly for 95,000; do you

1 have that?
2 MR. CHILDS: Yes, I have it.
3 THE COURT: Okay. So this is the quick-claim deed
4 from defendant --
5 MR. CHILDS: Oh, no, this is a grant bargain sale
6 deed.
7 THE COURT: I'm looking at your paragraph 45.
8 MR. CHILDS: Yeah, by grant bargain and sale deed.
9 THE COURT: Okay. What line is that on, please?
10 MR. CHILDS: 19.
11 THE COURT: Thank you. Sorry about that. Okay. Not
12 quick-claim deed. It's the grant bargain and sale deed from
13 Mr. Bursey, Defendant Bursey, to Precision Assets, LLC. This
14 happened dated April 15th --
15 MR. CHILDS: You want the recording date? Yeah,
16 April 15th, 2019.
17 THE COURT: I'm going by your complaint.
18 MR. CHILDS: Yeah.
19 THE COURT: April 15th, 2019, for 95,000.
20 MR. CHILDS: Yes.
21 THE COURT: Okay. $95,000. Let's move on. We're
22 almost done with this. Okay.
23 Then the next one I show is paragraph 47. This is
24 the Sacramento property deed of trust recorded April 18th. Is
25 that a -- do you -- have we introduced that yet? Deed of

1 trust, Exhibit 7. Look at -- no, look at 7, Exhibit 7. Deed
2 of trust, $220,000 dated April 15th of 2019, with a printout
3 and amortization. That's for 59 Sacramento. That's Exhibit 7.
4 MR. CHILDS: No. No. This deed of trust is from --
5 between Bursey and Dattala.
6 THE COURT: Okay. So that's going to be Exhibit 13.
7 Do you have it?
8 MR. CHILDS: Exhibit -- let's see.
9 THE COURT: And this is in -- this is paragraph 47.
10 MR. CHILDS: Wait, I'm looking at it. 59 --
11 MR. DATTALA: It'd be the amortization
12 (indiscernible).
13 MR. CHILDS: No, this is from Bursey to Precision.
14 MR. DATTALA: Oh.
15 THE COURT: Okay. From --
16 MR. CHILDS: This is a grant bargain and sale deed.
17 THE COURT: From Bursey -- this is deed of trust for
18 59 Sacramento.
19 MR. CHILDS: Mm-hmm.
20 THE COURT: And this is from Defendant Bursey to
21 Precision Assets.
22 MR. CHILDS: Right.
23 THE COURT: It's a grant bargain and sale deed.
24 MR. CHILDS: Yeah, I think that's Exhibit 11.
25 THE COURT: And that you told me that was a quick --

1 oh, no. Was it a quick-claim deed, 11?
2 MR. CHILDS: No, Exhibit 11 is a grant bargain and
3 sale deed from Bursey to --
4 THE COURT: All right. Well, let's try to catch this
5 sooner, Mr. Childs, so I don't spend so much time.
6 MR. CHILDS: I'm sorry.
7 THE COURT: All right. So this is Exhibit 11. We
8 don't have -- no, that one was for how much?
9 MR. CHILDS: It doesn't have the declaration of value
10 form on it.
11 THE COURT: Let me tell you what I have here. As
12 Exhibit 11, I have -- first of all, it was a quick-claim deed
13 for 59 Sacramento. And then that turned into a grant -- and
14 that's Exhibit 12 to Ms. Medina's deposition on October 15th of
15 2019. So it's not a quick-claim deed, Exhibit 11? 11, excuse
16 me, and that's 59 Sacramento.
17 MR. CHILDS: Yeah, Exhibit 11 is --
18 THE COURT: Is what?
19 MR. CHILDS: -- 59 Sacramento, grant bargain and sale
20 deed --
21 THE COURT: Okay.
22 MR. CHILDS: -- from Bursey --
23 THE COURT: So it's not a quick-claim deed?
24 MR. CHILDS: No.
25 THE COURT: Okay. Let me just correct this. Okay.

1 Grant -- no, do you actually have the deed? Is that Exhibit 12
2 to Ms. Medina's deposition dated --
3 MR. CHILDS: No, Exhibit 12 is the quick-claim deed.
4 THE COURT: Okay. So no, that's -- we're not, I'm
5 sorry, I'm not trying to be difficult. I just -- this is
6 starting to look crazy. 11 -- okay. Exhibit 11 --
7 MR. CHILDS: Mm-hmm.
8 THE COURT: -- is the quick-claim deed. I know this
9 is confusing, but we need to get through it.
10 MR. CHILDS: Sure.
11 THE COURT: We can't spend hours and hours. To 59
12 Sacramento and that was Exhibit 11, and this is Exhibit 12 to
13 Exhibit 11 which is Medina's deposition. 13 is the grant
14 bargain and sale deed of trust with respect to 59 Sacramento
15 from Bursey to Precision Assets; is that correct?
16 MR. CHILDS: No, that's 50 Sacramento to --
17 THE COURT: Okay. All right. 13 is 50 Sacramento
18 not 59?
19 MR. CHILDS: Right.
20 THE COURT: Okay. That's fine. 50 Sacramento and
21 that's for how much?
22 MR. CHILDS: $95,000.
23 THE COURT: I'm sorry. One moment. 130,000 --
24 MR. CHILDS: No, 95. That's what Bursey sold it to
25 Precision Assets for. That's what it says here.

1 THE COURT: Oh, okay. So wait. I've just -- okay.
2 One moment. Look at Exhibit 12. That's a grant bargain and
3 sale deed from Mr. Bursey to Precision Assets, LLC, dated April
4 15th of 2019 for 95,000. What property is that? 50
5 Sacramento? The one above is a quick-claim deed for 59. Is
6 this for 50 or 59? Just look at Exhibit 12 of Ms. Medina's, I
7 believe that's where it is.
8 MR. CHILDS: No, that's a quick-claim deed.
9 THE COURT: Which one?
10 MR. CHILDS: Exhibit 12 to Exhibit 12 --
11 THE COURT: First, you told me it was a quick-claim
12 deed, and then you told me it was a grant bargain and sale deed
13 from Mr. Bursey to Precision Assets, LLC, dated April 15th,
14 2019, for 95,000.
15 MR. DATTALA: Yes.
16 MR. CHILDS: Yeah, that's Exhibit 13.
17 THE COURT: No, that's 12.
18 MR. CHILDS: Well, 12 is Medina's deposition.
19 THE COURT: No.
20 MR. CHILDS: Oh.
21 THE COURT: Just a moment. No -- Medina's
22 deposition, hold on one second. 12 -- 11 is Medina's
23 deposition.
24 MR. CHILDS: Oh, okay.
25 THE COURT: 11 is 59 Sacramento. Is it a quick

1 deed -- quick-claim deed or is it a grant bargain and sale
2 deed, Exhibit 12 to Medina's deposition, which is it?
3 MR. CHILDS: Quick-claim deed. Quick-claim deed for
4 Nevada.
5 THE COURT: Okay. So it is the quick-claim deed.
6 12 -- don't put it away yet.
7 MR. CHILDS: Okay.
8 THE COURT: I have grant bargain and sale deed from
9 Mr. Bursey to Precision Assets dated April 15th of 2019, for
10 95,000. What property is that for?
11 MR. CHILDS: 50 Sacramento.
12 THE COURT: Okay. For 50 Sacramento. Then I have
13 Exhibit 13, a grant bargain and sale deed of trust for -- so
14 wait a second. 12 is a grant bargain and sale deed from
15 Mr. Bursey to Precision Assets for 95,000 and that's for 50
16 Sacramento.
17 MR. CHILDS: Yes.
18 THE COURT: 13, I have grant bargain and sale deed
19 for 50 Sacramento from Bursey to Precision -- I don't need 13.
20 MR. CHILDS: No, it'd be 59.
21 THE COURT: No, not 59. It's the next exhibit. What
22 is the next exhibit? After 12 -- so we have 11 is 59, 12 is 50
23 Sacramento. So I'm not going to duplicate this.
24 MR. CHILDS: Yeah.
25 THE COURT: We don't need to duplicate. Now, we're

1 going to have a new 13 if we need one.
2 MR. CHILDS: Okay.
3 THE COURT: Excuse me just a second. I just have to
4 just breathe for a moment. Okay. All right. Now, lucky I
5 take copious notes. All right.
6 Let's go to paragraph -- we've already done paragraph
7 47, I believe. Wait, hold on.
8 11 has to do with 59 Sacramento, but it doesn't state
9 where -- what state -- I have here, Sacramento property which
10 deed of trust was recorded April 18th -- this is paragraph
11 47 -- 2019, as to 59 Sacramento. Bursey immediately
12 transferred his interest to Precision Assets grant bargain and
13 sale deed recorded on May 2nd purportedly for 130,000. We
14 don't have this one yet. We only have the 50 Sacramento. Or
15 we have the 59 Sacramento that's Exhibit 12 to Medina's, but we
16 don't have the information that it was for 130,000.
17 MR. CHILDS: Yeah, that's a separate document.
18 THE COURT: All right. So is this a new document?
19 Because there can only be so many documents for two properties.
20 MR. CHILDS: It's an --
21 THE COURT: I have 59 Sacramento, quick-claim deed.
22 I have 50 Sacramento, grant bargain and sale deed already for
23 95. So this looks like it's 59 Sacramento from Bursey to
24 Precision. I don't think we have that one yet. If we do, then
25 let's not add another one to it. Okay. I'm sorry, my notes

1 were really good and they're starting to get a little crazy.
2 UNIDENTIFIED SPEAKER: It's okay, you're fine.
3 MR. CHILDS: It's confusing.
4 UNIDENTIFIED SPEAKER: As long as he's putting them
5 in the order of --
6 THE COURT: Yeah, you need to put them in the order
7 we're going through or it --
8 MR. CHILDS: I'm --
9 THE COURT: -- and I don't want to have to, like, sit
10 here and make sure.
11 MR. CHILDS: Nope.
12 THE COURT: Please be sure that you're doing that
13 properly.
14 MR. CHILDS: I am.
15 THE COURT: All right. Look, again, Exhibit 10, the
16 deposition of Ms. Spencer, Exhibit 3 to that deposition is a
17 quick-claim deed for Nevada for 50 Sacramento; all right?
18 MR. CHILDS: Yes.
19 THE COURT: Exhibit 11 is the quick-claim deed from
20 Ms. Medina's deposition, Exhibit 12, of 59 Sacramento; okay.
21 So we have two quick-claim deeds in.
22 MR. CHILDS: Yep.
23 THE COURT: Now, Exhibit 4 to Ms. Spencer's
24 deposition which is Exhibit 10 is a deed of full reconveyance
25 notarized, recorded in Clark County for 50 Sacramento.

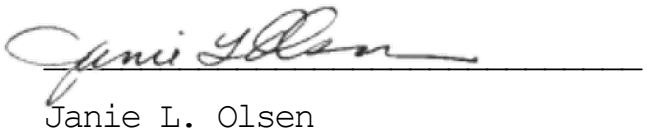
1 MR. CHILDS: Yes.
2 THE COURT: Okay. Now, we go to Exhibit 12. We have
3 a grant bargain and sale deed from Bursey to Precision Assets
4 dated April 15th for $95,000; that's for 50 Sacramento.
5 MR. CHILDS: Yes.
6 THE COURT: Okay. Then for -- I don't have anything
7 else. Do I need anything else?
8 MR. CHILDS: I think we need a deed for 59 Sacramento
9 from Bursey to Precision Assets.
10 THE COURT: We have 50, we have 50. We have -- I
11 don't -- where is it?
12 MR. CHILDS: Grant bargain and sale deed.
13 THE COURT: Do you have it?
14 MR. CHILDS: Yeah.
15 THE COURT: Okay. So Exhibit 13, please state it so
16 I can make good note of it.
17 MR. CHILDS: It's a grant bargain and sale deed from
18 Bursey to Precision Assets.
19 THE COURT: Hold on one second. Grant bargain and
20 sale deed from Bursey --
21 MR. CHILDS: Yes. To Precision Assets.
22 THE COURT: -- to Precision Assets. It's getting
23 late. Okay. Dated?
24 MR. CHILDS: May -- well, it was recorded May 2nd,
25 2019.

1 THE COURT: Recorded May 2nd, 2019. That's Exhibit
2 13, Mr. Childs.
3 MR. CHILDS: Yes.
4 THE COURT: All right. And -- all right. Let's see.
5 I don't believe we have any other exhibits. I think we have
6 all the -- I mean, in my mind, we have 13 exhibits. They cover
7 all of the transactions on both properties and show everything
8 that's occurred that Ms. Medina did on her own, that Mr. Bursey
9 did on his own and how they acted together.
10 Do you think that there's anything else we need?
11 MR. CHILDS: No, I don't.
12 THE COURT: Okay. I'd like you to give me those,
13 please. Are they in chronological order as far as --
14 MR. CHILDS: No, they're just in this number order
15 that you gave me.
16 THE COURT: No, that's what I mean. In the
17 chronological numbered order for the exhibits in this hearing.
18 MR. CHILDS: Yes.
19 THE COURT: Okay. I'd like you to please hand those
20 to Madam Clerk. And you're going to want this.
21 THE CLERK: Okay. I have one more question and I
22 hate to ask.
23 THE COURT: No, no, no, don't -- wait, Mr. -- What's
24 the question?
25 THE CLERK: I'm --

1 THE COURT: Don't hate to ask anything because if we
2 don't have a good record, we don't have anything. Go on.
3 THE CLERK: Before you went to recess so you can give
4 him the order, I notated declaratory forms.
5 THE COURT: You mean declaratory forms?
6 THE CLERK: Yes.
7 THE COURT: For?
8 THE CLERK: I didn't get the full report but I do
9 have --
10 THE COURT: So do you know what paragraph it was?
11 THE CLERK: No.
12 THE COURT: Okay. Let me just look and see my notes
13 because I take really good notes actually. Do you know of
14 anything that had to do with a declaratory in its --
15 MR. CHILDS: Declaratory relief?
16 THE CLERK: The form.
17 MR. CHILDS: The declaration of value form? Oh yeah,
18 that's attached to those deeds.
19 THE CLERK: Got it. Okay.
20 THE COURT: Okay.
21 MR. CHILDS: Yeah, it should be a part of --
22 THE COURT: Thank you. Thank you. Good catch, Madam
23 Clerk.
24 MR. CHILDS: -- it should be a part of the -- see
25 that's a part of a deed.

1 THE COURT: Okay. We're done with that.
2 Madam Clerk, do you have any questions? Take a look
3 while we're discussing this. Okay.
4 Now, we're moving to the judgment; all right? So as
5 we discussed earlier, the amount was 370,000.
6 Are you following, Mr. Childs?
7 MR. CHILDS: Yes.
8 THE COURT: Okay. And deducted from that is $10,000,
9 5 for an earnest money deposit from Mr. Bursey for the 50
10 Sacramento property and 5 from Mr. Bursey for the 59 Sacramento
11 property which leaves us with 360,000. We're going to reduce
12 that by $4,467 which was the principal paid over 11 months by
13 Mr. Bursey to Mr. Dattala.
14 I am as a -- just give me a moment, as a -- give me
15 one moment. As a sanction including the default waiving the
16 principal amount; okay. So we are down, after deducting from
17 360,000, $4,467 we are at $355,533. You have a demand for
18 treble damages because of your, R-I-C-O, RICO claim which is --
19 let's see, which cause of action it is because that's
20 important.
21 MR. CHILDS: The last one.
22 THE COURT: The last one? Okay. One moment.
23 Your seventh cause of action which is RICO, that
24 allows treble damages and that is granted. So three times --
25 treble damages are three times the $355,533 -- sorry, 355,533

1 times three I show it, waiving attorney's fees and costs that
2 Mr. Dattala has done, is $1,066,599.
3 MR. CHILDS: Okay.
4 THE COURT: And do you have any other questions
5 because I think we are done?
6 MR. CHILDS: Sounds good.
7 THE COURT: Please provide a order with detailed
8 findings of fact and conclusions of law and everything that
9 we've been through today, and when I get that in my orders --
10 MR. CHILDS: Sure.
11 THE COURT: -- I will be happy to look at it, and if
12 everything's consistent, I'll sign it as soon as possible.
13 MR. CHILDS: It will be tomorrow.
14 / / /
15 / / /
16 / / /
17 / / /
18 / / /
19 / / /
20 / / /
21 / / /
22 / / /
23 / / /
24 / / /
25 / / /

1 THE COURT: Mr. Dattala, I wish you a lot of luck. I
2 hope -- I don't know what's wrong, but I hope you're feeling
3 better.
4 And so we're done.
5 MR. CHILDS: Yep.
6 THE COURT: Off the record. It's a wrap.
7 (Proceedings concluded at 4:21 p.m.)
8 -oOo-
9 ATTEST: I do hereby certify that I have truly and correctly
10 transcribed the audio/video proceedings in the above-entitled
11 case to the best of my ability.
12
13 
14 Janie L. Olsen
Transcriber
15
16
17
18
19
20
21
22
23
24
25

MR. BENEDICT: [24] 2/12 10/7 10/11 12/2 12/6 13/16 13/18 21/24 22/11 23/5 23/8 25/21 27/19 28/9 29/6 29/9 29/12 29/21 29/24 30/16 33/12 34/2 34/24 35/4
MR. CHILDS: [740]
MR. DATTALA: [38] 62/22 63/16 63/19 63/21 63/24 64/5 64/9 74/5 75/4 75/7 75/12 75/21 77/21 77/23 78/2 79/15 79/23 80/5 80/7 80/10 80/18 80/22 80/25 81/3 82/10 85/1 88/21 91/24 92/1 98/22 101/7 111/21 115/13 116/3 118/2 132/11 132/14 135/15
MR. LANCASTER: [23] 2/8 2/11 8/14 8/16 10/5 12/5 20/15 20/24 21/3 23/11 23/13 23/15 28/2 28/4 28/14 28/16 29/5 31/5 33/16 34/1 34/12 34/18 34/23
MR. SEGAL: [1] 2/17
THE CLERK: [12] 38/4 38/7 122/15 126/20 140/21 140/25 141/3 141/6 141/8 141/11 141/16 141/19
THE COURT: [810]
THE MARSHAL: [12] 31/2 31/12 31/15 32/17 32/22 32/24 33/2 33/4 103/2 103/5 103/7 103/12
THE WITNESS: [1] 38/6
UNIDENTIFIED SPEAKER: [4] 8/12 105/1 138/2 138/4

$

$1,066,599 [1] 143/2
$1,500 [2] 62/20 62/25
$10,000 [10] 53/25 62/6 62/14 78/9 78/18 79/12 83/20 89/11 109/20 142/8
$130,000 [1] 90/18
$1300 [1] 64/7
$1400 [1] 63/21
$1443 [2] 74/9 98/4
$15,000 [3] 46/19 48/12 93/9
$150,000 [3] 53/13 72/10 73/12
$152,263 [1] 89/16
$220,000 [7] 53/16 76/18 78/17 78/25 79/2 115/5 132/2
$3,5 [1] 97/17
$355,000 [1] 97/19
$355,533 [4] 97/18 98/11 142/17 142/25
$360,000 [2] 55/8 97/9
$370,000 [7] 51/25 52/19 52/24 53/16 54/15 89/10 97/8
$4,467 [13] 54/9 54/13 54/14 55/5 89/12 97/9 97/12 98/4 110/1 110/15 110/25 142/12 142/17
$467 [4] 55/7 55/10 55/11 97/11
$5,000 [4] 53/25 72/8 73/10 73/18
$533 [1] 98/15
$9,976 [5] 62/16 89/12 98/8 110/3 110/16
$9,996 [1] 54/10
$95,000 [4] 90/3 131/21 134/22 139/4

-

-oOo [1] 144/8

0

025 [1] 71/3
043 [1] 70/20

1

10 [32] 4/4 11/24 30/17 52/8 58/4 61/21 67/25 67/25 69/25 70/2 70/3 70/5 74/9 88/24 97/8 114/20 116/7 116/8 118/4 118/13 119/24 121/8 121/11 121/19 121/21 121/22 121/24 122/3 122/24 127/5 138/15 138/24
10,000 [2] 54/14 109/18
10105 [1] 2/9
11 [35] 62/25 63/22 63/23 64/11 64/12 71/12 71/12 98/2 98/5 98/6 98/20 110/2 110/15 110/16 127/17 127/19 128/1 132/24 133/1 133/2 133/7 133/12 133/15 133/15 133/17 134/6 134/6 134/12 134/13 135/22 135/25 136/22 137/8 138/19 142/12
111 [1] 15/18
11:42 [1] 2/1
12 [31] 45/6 45/11 64/21 64/22 71/20 91/18 92/13 93/23 111/7 129/5 129/6 129/18 133/14 134/1 134/3 134/12 135/2 135/6 135/10 135/10 135/17 135/18 135/22 136/2 136/6 136/14 136/22 136/22 137/15 138/20 139/2
120 [1] 45/1
12:22 [1] 31/18
12:34 [2] 31/2 31/18
12:45 [1] 31/2
13 [18] 1/12 2/1 13/24 64/13 66/17 72/1 93/17 132/6 134/13 134/17 135/16 136/13 136/18 136/19 137/1 139/15 140/2 140/6
130,000 [3] 134/23 137/13 137/16
1300 [1] 17/8
14 [11] 64/8 64/9 64/10 70/5 72/4 73/3 82/18 83/23 91/17 112/1 114/3
140 [1] 71/3
140-31-817-043 [1] 70/20
15 [10] 48/21 48/23 67/3 68/1 74/12 74/18 93/25 94/6 122/6 129/18
15th [30] 4/19 18/5 25/19 32/5 76/18 79/2 88/12 90/2 92/4 114/19 115/5 117/3 117/5 117/6 122/23 129/8 129/11 129/12 129/24 130/18 130/25 131/14 131/16 131/19 132/2 133/14 135/4 135/13 136/9 139/4
16 [2] 23/1 75/14
16th [7] 4/22 16/5 18/5 18/7 22/6 22/21 27/23
17 [6] 51/13 51/18 66/14 66/16 66/17 75/22
18 [3] 76/5 76/6 115/8
18th [3] 127/10 131/24 137/10
19 [8] 76/15 76/16 78/4 78/5 114/1 114/16 114/18 131/10
1992 [1] 70/14
19th [7] 75/14 76/7 78/10 78/19 79/12 79/18 80/1
1:19 [1] 68/2
1:30 [1] 5/17
1:40 [1] 68/2
1st [1] 83/19

2

2.6 [1] 31/19
2.67 [4] 6/17 7/6 7/11 23/2
2.69 [4] 6/17 7/11 23/2 31/20
20 [2] 78/5 78/6
2016 [1] 70/11
2017 [1] 72/1
2018 [16] 63/18 72/6 72/7 73/8 73/9 73/13 73/19 73/19 73/20 73/24 74/7 74/10 74/18 75/2 75/24 114/4
2019 [73] 42/1 42/5 42/11 42/11 42/13 42/23 44/23 57/8 57/10 71/25 72/10 74/10 75/14 75/15 76/7 76/7 76/18 78/10 78/19 79/8 79/12 79/17 79/18 79/25 80/1 80/13 82/6 82/15 83/19 84/5 86/10 86/22 87/16 87/19 87/22 90/2 90/17 92/4 92/7 103/24 103/25 104/2 104/17 104/25 115/5 117/3 117/7 117/8 118/17 119/16 119/20 119/21 120/6 121/1 121/2 122/24 123/3 123/6 127/2 129/8 129/12 129/18 130/25 131/16 131/19 132/2 133/15 135/4 135/14 136/9 137/11 139/25 140/1
2020 [4] 71/18 79/2 88/12 129/24
2021 [3] 1/12 2/1 38/12
2022 [2] 13/18 32/11
205.090 [1] 50/23
205.120 [1] 50/19
207.400 [1] 51/20
20th [1] 32/12
21 [1] 78/16
22 [2] 78/24 114/3
220 [1] 114/18
22nd [1] 87/22
23 [5] 49/1 67/3 79/8 92/13 103/5
23rd [1] 18/1
24 [1] 79/17
240.001 [3] 49/22 50/3 95/17
240.120 [8] 44/4 44/5 45/1 47/5 47/16 48/1 48/3 48/10
240.169 [3] 49/22 50/3 95/17
240.175 [1] 50/2
25 [3] 79/25 103/6 126/20
26 [4] 80/11 94/7 116/10 117/13
267 [2] 29/24 30/3
269 [2] 29/25 30/3
27 [6] 18/13 81/20 81/21 82/2 87/16 127/22
27th [2] 75/15 76/7
28 [3] 18/13 70/17 82/12
28th [1] 13/1
29 [3] 42/23 83/17 123/15
29th [7] 41/2 56/13 84/5 103/24 103/25 106/6 106/11
2:00 [1] 32/12
2:24 [1] 103/14
2nd [1] 72/10 73/18 73/20 73/24 74/7 90/17 92/7 114/4 137/13 139/24 140/1

3

3-0 [1] 40/11
3.5 [2] 6/8 30/14
3.5RPC [1] 6/7
30 [25] 36/11 40/7 40/10 40/11 40/23 40/24 41/2 41/20 42/2 42/25 43/4 46/4 47/15 56/10 57/1 65/8 84/4 84/23 85/23 86/24 92/19 106/14 106/25 111/9 123/22
31 [7] 41/10 41/10 41/11 56/15 71/3 84/21 84/22
31st [1] 38/12
32 [7] 41/11 41/16 56/23 85/18 85/19 124/19 124/23
33 [9] 41/21 41/22 57/2 57/4 57/13 86/18 86/19 86/25 125/10
34 [15] 42/8 42/21 43/17 43/19 50/1 50/25 51/8 57/19 57/23 58/21 67/10 95/20 105/16 105/20 106/19
35 [11] 43/1 43/17 43/20 50/1 50/25 51/8 59/16 59/17 59/23 67/10 95/21
355,000 [2] 98/13 98/14
355,533 [1] 142/25
36 [2] 43/16 59/18
360,000 [3] 54/25 142/11 142/17
37 [4] 23/1 43/18 60/3 60/8
370,000 [2] 54/25 142/5
38 [3] 44/1 44/21 60/11
39 [3] 44/22 60/14 87/5
3946 [1] 2/5
3:25 [1] 103/14
3rd [27] 42/1 42/5 42/11 42/12 42/13 42/20 43/2 43/6 44/23 57/7 57/10 57/11 59/13 59/17 72/6 72/7 73/8 73/9 73/19 73/19 86/10 86/22 104/2 104/17 104/25 106/22 107/16

4

4,000 [2] 55/6 55/9
4,467 [1] 62/16
4,600 [1] 62/15
4/8/2019 [1] 119/16
40 [9] 44/25 60/18 61/2 61/4 64/24 101/24 102/1 102/1 107/22
400 [1] 98/4
4029 [1] 71/17
41 [9] 83/3 87/10 87/11 87/12 88/2 125/25 126/2 127/21 128/10

4

42 [3] 12/23 88/6 129/25
42.001 [1] 99/17
43 [6] 61/21 62/9 62/11 88/14 108/25 130/6
44 [6] 54/6 54/20 62/4 62/15 89/8 130/11
440 [1] 89/12
446 [1] 54/2
4467 [1] 55/8
45 [19] 84/18 84/19 85/9 85/12 85/15 85/17 89/24 90/7 90/8 102/1 102/25 103/5 123/23 123/23 123/25 124/10 130/16 130/22 131/7
46 [6] 85/12 85/15 85/17 90/4 90/11 124/10
47 [6] 90/14 90/15 131/23 132/9 137/7 137/11
48 [2] 90/22 91/1
49 [2] 90/25 91/6
4:21 [1] 144/7
4th [1] 74/10

5

5,000 [1] 54/23
50 [71] 18/19 46/8 53/12 61/11 62/1 63/14 70/13 70/15 70/16 70/23 72/6 72/11 73/8 73/13 73/21 74/3 74/8 75/16 76/8 78/25 82/8 82/19 83/21 87/15 87/20 88/3 89/10 89/16 89/25 90/4 91/12 92/4 92/25 109/6 109/9 112/6 112/9 112/21 113/3 114/5 114/9 114/14 115/12 116/1 126/5 126/9 127/7 127/8 127/11 127/12 128/22 130/21 130/23 134/16 134/17 134/20 135/4 135/6 136/11 136/12 136/15 136/19 136/22 137/14 137/22 138/17 138/25 139/4 139/10 139/10 142/9
533 [2] 97/20 97/21
54B [1] 18/25
5581 [1] 2/13
56 [1] 112/8
57 [4] 91/10 91/13 91/17 91/17
58 [1] 92/2
59 [71] 17/23 18/12 41/6 46/8 53/15 62/2 70/22 70/23 70/24 74/23 75/9 76/3 76/14 76/17 77/19 78/8 78/17 79/11 80/2 84/9 87/21 88/4 88/15 89/10 89/17 90/15 92/6 92/7 93/1 109/3 109/11 112/7 112/10 112/16 112/24 113/8 114/11 115/15 115/22 126/6 126/12 126/15 127/14 128/17 128/22 128/24 129/2 129/19 132/3 132/10 132/18 133/13 133/16 133/19 134/11 134/14 134/18 135/5 135/6 135/25 136/20 136/21 136/22 137/8 137/11 137/15 137/21 137/23 138/20 139/8 142/10
5th [12] 80/13 82/6 82/15 87/19 117/14 117/22 120/6 120/7 120/9 120/10 120/14 123/5

6

60 [1] 92/8
61 [12] 45/3 45/5 45/10 45/11 45/25 64/25 92/15 92/16 110/24 111/3 111/4 111/6
62 [5] 45/10 46/3 65/5 92/18 111/8
63 [4] 46/7 65/9 71/2 92/24
64 [3] 46/12 65/12 93/4
65 [3] 46/17 65/15 93/7
66 [5] 46/20 65/16 65/17 93/13 111/15
67 [4] 46/23 46/24 47/1 66/18
68 [3] 47/3 66/19 66/21
69 [2] 47/14 66/25

7

70 [2] 47/18 66/23
71 [2] 47/20 66/23
72 [2] 47/24 66/24
73 [1] 48/7
74 [2] 48/10 67/1
75 [2] 48/17 66/25
7th [6] 11/19 13/10 32/11 36/25 37/1 42/10

8

80 [1] 94/1
810 [1] 71/3
83 [7] 48/21 49/3 94/6 94/8 96/19 96/22 96/22
84 [4] 49/5 67/4 93/21 94/11
85 [4] 49/19 95/10 95/11 96/22
86 [5] 50/2 67/16 95/22 95/23 96/22
87 [4] 50/16 67/17 70/25 96/22
88 [3] 50/20 67/17 96/22
89 [7] 50/24 67/18 86/1 86/3 86/6 96/22 124/24
89110 [5] 70/14 70/16 70/23 70/25 71/17
8th [11] 87/16 118/17 119/18 119/19 120/6 120/20 120/25 123/3 123/6 123/6 127/2

9

9,976 [1] 110/15
90 [7] 51/7 51/11 51/12 51/14 67/21 96/23 124/24
91 [5] 51/12 51/15 51/17 67/21 96/23
92 [3] 51/21 53/1 96/23
93 [4] 52/4 67/22 96/19 96/23
95 [2] 134/24 137/23
95,000 [6] 130/25 131/19 135/4 135/14 136/10 136/15
96 [4] 108/11 125/1 125/2 125/5

A

A.M [1] 2/1
AARON [2] 1/18 2/8
ability [2] 23/2 144/11
able [10] 5/1 9/21 11/22 12/22 13/4 13/9 20/19 21/16 22/23 23/18
about [62] 4/4 4/12 5/7 5/14 6/15 8/1 9/9 10/19 11/25 12/12 12/14 12/14 16/21 18/12 18/25 20/17 27/6 27/9 30/23 33/6 41/6 42/1 45/25 46/10 47/1 47/4 48/15 51/1 53/3 57/19 63/15 63/22 64/13 64/23 65/5 66/19 66/20 67/9 70/7 73/19 75/10 77/10 78/13 80/23 84/9 86/23 87/6 90/6 90/12 91/1 95/24 95/25 102/1 115/2 116/14 118/16 121/10 121/22 121/25 127/9 128/17 131/11
above [30] 42/2 42/25 43/4 43/20 43/22 46/4 46/10 46/10 47/23 49/25 50/25 60/7 65/1 71/14 72/3 79/5 82/18 83/23 84/23 85/23 86/24 87/17 92/19 92/19 93/2 123/22 124/15 130/10 135/5 144/10
above-entitled [1] 144/10
absolutely [4] 3/9 16/18 33/9 97/23
accept [3] 7/24 83/20 122/15
accommodating [1] 34/13
accomplish [3] 46/13 91/7 93/5
according [2] 21/21 93/11
achieved [1] 10/2
acknowledge [3] 63/4 80/15 117/16
acknowledged [4] 82/5 82/14 87/18 117/21
acknowledgment [2] 62/18 62/24
act [6] 28/9 43/21 44/16 44/17 46/18 60/6
acted [2] 65/10 140/9
acting [1] 47/21
action [28] 41/1 45/16 46/5 46/7 46/12 46/24 47/25 48/24 49/3 64/20 66/14 66/17 67/2 91/7 91/11 91/14 92/13 92/20 92/25 93/4 93/16 93/23 94/3 94/4 96/18 111/7 142/19 142/23
actions [3] 25/24 51/22 92/9
activity [7] 49/9 49/21 50/18 50/22 51/20 94/13 95/14
acts [8] 40/5 44/6 46/17 46/18 47/22 66/20 93/7 93/7
actual [5] 60/11 92/5 92/7 97/18 99/10
actually [14] 7/5 12/6 12/9 23/4 25/8 34/5 37/13 54/5 54/25 112/9 122/11 125/5 134/1 141/13
add [7] 21/24 72/20 123/18 125/4 125/7 126/12 137/25
adding [1] 9/2
addition [1] 115/25
additional [2] 9/3 9/3
address [5] 5/4 5/7 70/16 70/24 71/25
addressed [2] 6/19 6/22
addressing [1] 111/4
adds [1] 52/18
admissibility [1] 12/15
admission [2] 53/18 53/24
admits [1] 97/8
admitted [13] 9/5 9/7 9/11 13/24 17/22 18/20 20/18 21/4 21/5 21/6 25/16 40/2 45/18
adopted [3] 49/23 50/4 95/18
ADRIANA [1] 1/11
advanced [1] 26/7
adverse [1] 12/13
affect [2] 14/25 90/13
affidavit [28] 41/5 41/12 41/19 42/9 42/22 43/1 43/5 51/2 56/11 56/15 57/22 59/12 59/15 60/7 84/7 84/16 86/20 86/21 104/20 105/4 105/5 105/8 105/10 105/18 105/21 106/22 107/16 124/10
affidavits [36] 41/24 42/2 42/25 43/4 43/17 43/19 46/4 47/15 49/25 51/8 56/16 57/3 57/4 57/20 57/24 57/25 58/22 59/6 64/24 65/1 65/6 67/12 67/19 84/22 85/2 85/22 86/23 92/18 95/20 103/21 105/17 105/19 106/24 111/9 124/1 124/13
afford [1] 19/2
after [15] 4/4 5/21 10/16 16/8 18/5 25/19 43/9 97/2 102/23 103/2 103/7 103/9 111/8 136/22 142/16
afternoon [3] 2/22 5/17 35/16
afterwards [1] 72/24
again [13] 8/1 15/3 15/7 19/8 47/7 75/15 76/7 89/21 111/4 124/18 126/1 128/14 138/15
against [16] 8/5 9/7 12/17 15/18 15/19 22/4 25/25 25/25 28/19 29/13 31/20 32/21 48/2 101/19 101/20 103/18
agency [2] 40/4 47/22
agent [5] 40/3 40/4 47/19 47/21 89/19
ago [1] 47/4
agree [10] 12/4 14/24 15/2 17/14 17/14 17/16 23/15 24/13 99/7 101/14
agreed [1] 97/8
agreeing [1] 25/1
agreement [22] 22/17 72/5 72/7 72/17 72/24 73/4 73/9 73/20 109/9 109/11 112/2 112/6 112/8 112/17 112/21 112/24 113/4 113/9 113/13 113/25 114/8 116/2
agreements [9] 61/19 61/22 62/1 76/3 76/14 77/8 109/4 109/6 112/15
ahead [10] 6/21 7/16 17/5 17/5 22/17 45/11 48/20 57/17 97/5 118/11
air [1] 13/2
airtight [1] 83/11
all [167]
allegation [1] 46/20
allegations [5] 7/21 8/5 24/23 46/10 67/18
allow [7] 9/24 11/20 26/4 46/8 92/25 97/6 110/4
allowed [2] 8/23 9/24
allowing [1] 29/16
allows [1] 142/24
almost [3] 52/2 125/21 131/22

A

already [37] 22/6 22/13 29/13 57/13 60/16 65/5 65/13 65/14 66/20 66/21 66/23 68/11 71/7 74/15 78/12 79/5 84/14 85/24 86/14 86/14 89/3 92/21 96/21 107/12 112/15 113/6 114/1 123/10 124/20 124/21 125/25 126/2 126/9 126/11 130/17 137/6 137/22
also [20] 4/10 4/13 11/4 28/12 45/18 55/4 56/21 57/2 57/3 57/12 59/14 81/22 86/1 97/1 107/2 110/3 110/25 112/23 114/7 130/11
although [2] 11/15 71/20
always [3] 66/8 66/8 97/25
am [5] 4/7 43/21 110/4 138/14 142/14
amazing [1] 34/17
amended [14] 18/11 18/14 24/22 24/25 35/22 36/1 38/10 45/13 69/8 69/20 70/6 71/1 72/15 91/18
amortization [15] 64/2 76/19 77/4 77/10 77/21 77/23 79/3 114/20 114/24 115/3 115/7 115/16 116/1 132/3 132/11
amount [19] 12/8 48/11 48/12 51/25 54/14 72/10 73/12 76/18 79/2 83/20 91/20 91/21 93/10 98/1 101/10 114/18 115/4 142/5 142/16
analysis [1] 66/1
animosity [1] 34/7
another [10] 12/14 18/20 19/10 59/12 59/14 73/15 121/3 125/7 126/12 137/25
answer [8] 7/10 13/12 17/18 17/21 22/18 22/19 23/23 24/5
answer's [1] 8/2
answered [1] 29/14
answering [1] 29/16
any [12] 12/17 13/12 20/10 34/6 66/25 67/22 90/24 110/8 129/14 140/5 142/2 143/4
anyone [1] 15/10
anything [22] 7/4 11/1 24/6 24/19 25/1 25/13 26/21 35/9 40/21 57/19 74/13 81/10 82/20 103/22 113/23 121/4 139/6 139/7 140/10 141/1 141/2 141/14
anyway [4] 4/21 20/5 101/8 101/10
anywhere [1] 127/25
APN [2] 70/19 71/3
apologize [2] 14/14 128/11
appeal [5] 19/1 19/4 19/5 21/19 22/24
appear [1] 23/1
appearance [2] 49/17 95/6
appearances [2] 1/15 2/3
applicable [5] 42/24 43/3 43/24 106/13 106/23
application [2] 4/20 4/25
applied [2] 110/16 110/16
applies [2] 48/6 89/5
apply [1] 97/1
appreciate [2] 28/9 34/14
approached [1] 22/14
April [60] 41/2 42/23 56/13 76/18 78/10 78/19 79/2 79/8 79/11 79/17 79/17 79/18 79/25 80/1 80/13 82/6 82/15 83/19 84/5 87/16 87/18 87/22 90/2 92/4 103/24 103/25 106/6 114/19 115/5 117/14 117/22 118/17 119/18 119/19 120/6 120/6 120/7 120/9 120/10 120/14 120/20 120/25 123/3 123/5 123/5 123/6 127/2 127/10 130/18 130/25 131/14 131/16 131/19 131/24 132/2 135/3 135/13 136/9 137/10 139/4
are [104] 2/24 3/16 5/19 6/4 7/1 7/2 7/8 7/21 7/24 8/4 8/5 8/6 8/18 9/1 9/2 9/5 9/5 9/7 9/10 9/20 11/11 11/22 11/22 12/25 12/25 13/8 13/20 14/12 15/4 15/5 15/21 16/15 17/21 20/2 20/4 20/18 20/19 21/5 21/5 21/17 21/19 23/20 24/7 27/6 27/9 31/23 36/23 37/1 37/3 38/17 39/8 40/2 46/5 46/10 56/18 57/20 57/24 58/1 58/22 58/23 61/22 65/8 66/5 67/12 67/17 67/18 67/19 68/8 68/11 77/9 79/4 81/4 81/20 83/2 85/3 91/11 91/16 92/19 96/4 97/7 100/24 101/6 101/15 103/16 103/16 106/5 109/12 110/13 111/4 111/22 124/6 124/11 124/13 124/15 124/21 127/25 128/2 128/4 140/13 142/6 142/16 142/17 142/25 143/5
aren't [3] 5/22 5/24 24/12
argument [2] 22/14 97/4
Armstrong [1] 28/13
around [1] 22/21
arranged [2] 80/12 117/14
as [146]
ask [8] 32/18 63/8 77/15 77/18 87/23 122/19 140/22 141/1
asked [6] 11/18 78/12 83/2 121/10 121/23 126/21
asking [1] 118/15
assertions [1] 7/14
Assessor's [1] 70/19
ASSETS [27] 1/21 2/13 12/17 13/10 18/25 19/18 19/20 19/21 90/1 90/6 90/12 90/16 130/24 131/13 132/21 134/15 134/25 135/3 135/13 136/9 136/15 137/12 139/3 139/9 139/18 139/21 139/22
assigns [1] 15/20
associated [3] 73/22 73/24 85/21
Assuming [1] 31/7
at [82] 3/22 4/4 5/17 7/7 8/3 8/19 10/13 10/17 11/22 12/21 13/5 13/24 16/11 18/24 19/3 22/8 23/8 24/17 27/17 28/7 32/12 35/24 39/12 44/17 45/25 47/18 48/12 48/21 49/1 49/8 49/20 50/17 50/21 51/15 52/8 52/11 52/13 54/16 57/1 61/9 64/4 67/5 68/23 69/20 71/22 76/19 78/17 79/1 79/3 81/17 92/10 92/13 93/11 94/6 94/7 94/12 95/13 96/11 96/22 103/8 105/9 107/22 108/14 108/25 111/5 113/3 114/3 116/4 118/5 118/15 128/10 128/10 129/25 131/7 132/1 132/1 132/10 135/2 135/6 142/17 143/11 144/7
attach [3] 82/4 82/13 117/20
attached [13] 77/4 77/11 87/17 89/19 95/3 104/2 114/19 114/25 115/9 117/25 129/1 129/3 141/18
attaching [1] 18/19
attempt [5] 18/18 82/14 82/16 83/19 87/20
ATTEST [1] 144/9
attorney [14] 6/5 7/3 24/5 29/19 36/11 41/25 42/5 46/21 48/18 52/5 52/6 86/22 93/13 100/25
attorney's [10] 52/6 65/17 65/18 66/5 93/14 101/15 101/18 111/15 111/19 143/1
attorneys [2] 34/7 73/1
audio [1] 144/10
audio/video [1] 144/10
August [8] 72/10 73/12 73/20 73/24 74/7 74/9 78/10 114/4
authenticity [2] 49/17 95/6
authorized [2] 43/21 60/6
Avi [1] 2/15
aware [7] 2/24 3/19 4/3 16/3 19/4 19/9 19/10
away [3] 3/18 102/9 136/6

B

back [30] 9/19 13/23 15/3 16/10 19/8 21/9 21/17 24/21 25/2 25/19 27/15 27/16 28/25 31/1 31/2 31/17 35/1 35/9 40/16 40/25 55/24 58/10 71/18 72/23 75/17 76/9 83/8 86/3 102/20 103/1
balance [3] 79/10 98/10 98/11
Ball [6] 15/7 15/9 19/19 19/25 22/10 22/11
Ball's [2] 13/22 25/6
balls [1] 14/5
Bar [2] 2/9 2/13
barely [1] 24/15
bargain [26] 90/2 90/17 128/7 130/17 130/24 131/5 131/8 131/12 132/16 132/23 133/2 133/19 134/14 135/2 135/12 136/1 136/8 136/13 136/14 136/18 137/12 137/22 139/3 139/12 139/17 139/19
based [6] 7/19 12/23 29/17 44/6 89/8 89/16
Bates [3] 85/15 85/17 124/10
be [124] 3/19 5/1 6/3 8/19 9/4 9/21 9/25 10/1 10/2 10/3 11/18 11/20 11/22 12/8 12/19 13/3 13/7 13/12 15/17 15/18 16/12 18/1 19/5 19/6 19/8 19/12 19/18 20/2 20/19 20/20 21/15 22/7 22/16 22/23 23/6 23/18 23/18 25/6 26/3 26/4 26/6 27/7 28/18 29/9 29/21 31/16 31/21 32/11 32/12 32/13 37/10 38/9 41/17 43/5 43/11 43/18 46/21 48/12 48/22 54/14 54/25 55/7 56/16 60/8 60/20 62/17 64/7 64/13 65/14 65/17 66/4 66/6 66/11 68/12 72/8 72/24 73/10 73/14 78/18 81/6 84/13 85/20 93/10 94/24 97/9 99/19 100/2 100/14 100/17 101/14 102/3 102/22 103/1 103/17 104/6 105/10 107/8 108/3 108/13 109/5 109/19 109/23 110/4 111/22 117/8 117/25 121/15 122/19 125/18 127/16 127/19 129/17 130/9 130/12 132/6 132/11 134/5 136/20 137/19 138/12 141/21 141/24 143/11 143/13
because [84] 2/20 3/23 4/3 5/12 6/2 6/5 7/23 8/4 9/8 9/18 9/20 13/2 15/11 17/11 17/20 19/3 19/5 19/20 20/7 20/11 21/6 22/21 24/4 24/11 24/16 24/19 24/24 25/2 26/5 26/7 26/9 26/25 26/25 27/2 28/20 31/24 35/1 36/3 37/15 37/19 38/16 40/15 51/2 54/11 54/15 54/22 55/14 56/2 59/6 62/12 66/1 66/7 69/5 86/13 91/10 96/2 97/25 99/4 99/17 99/22 100/2 100/16 101/1 101/10 102/3 102/10 106/6 110/18 114/1 116/2 116/17 117/1 119/4 125/16 125/21 126/1 128/20 130/7 137/19 141/1 141/13 142/18 142/19 143/5
become [2] 100/13 130/9
been [30] 11/4 11/15 14/2 14/7 17/7 20/24 21/22 22/13 22/15 26/7 32/20 34/13 34/16 34/17 36/11 36/23 37/2 38/2 41/7 48/11 48/17 52/5 66/10 71/6 96/25 100/16 103/17 103/21 130/4 143/9
before [17] 1/11 6/9 7/6 20/2 31/23 57/1 66/7 67/14 67/20 72/12 75/1 97/25 102/2 107/12 112/3 115/21 141/3
befriend [1] 72/1
begins [4] 67/3 96/22 [illegible] 2/14
behalf [2] 2/8 2/13
being [7] 14/10 38/2

B

being... [5] 44/21 50/18 50/21 74/10 80/13
believe [32] 6/12 6/14 6/17 6/23 7/9 9/2 11/21 12/3 18/24 21/14 30/5 32/2 34/5 36/17 57/5 65/14 65/20 73/23 83/15 91/5 100/17 104/17 107/22 109/4 111/2 117/25 125/15 130/5 130/8 135/7 137/7 140/5
below [5] 40/5 54/21 70/12 87/15 88/17
Ben [1] 24/16
BENEDICT [12] 1/21 2/13 2/18 10/6 19/20 19/21 21/23 23/16 28/6 28/12 29/1 29/2
BENJAMIN [2] 1/16 2/5
best [3] 20/3 38/23 144/11
better [3] 13/8 100/2 144/3
between [7] 9/8 9/14 13/5 29/15 46/5 92/20 132/5
bifurcate [3] 2/24 8/9 9/24
bifurcation [5] 4/13 5/8 6/23 16/16 20/11
big [2] 18/23 36/8
bit [9] 10/9 17/10 20/22 28/25 44/12 57/17 58/12 58/19 98/1
blah [2] 116/16 116/16
Block [2] 70/17 71/1
bold [1] 44/19
Bonita [12] 80/15 81/1 81/7 82/24 116/10 117/1 117/17 120/11 122/20 122/23 123/10 128/15
book [37] 35/21 41/18 41/23 42/6 43/18 44/22 45/2 47/11 49/24 56/24 56/25 57/2 57/4 57/5 60/14 60/20 60/21 61/5 68/22 70/18 71/2 85/21 86/20 87/8 95/19 102/19 104/2 104/17 105/3 108/1 108/8 108/9 108/23 121/16 121/17 124/25 126/1
books [1] 35/1
both [13] 11/16 43/16 43/17 43/19 45/17 53/25 59/23 96/19 124/22 125/14 128/21 130/14 140/7
bottom [3] 45/11 48/21 48/23
bought [1] 63/17
breach [1] 66/22
breached [1] 47/14
break [8] 30/10 30/11 33/10 39/7 58/4 58/17 67/25 68/15
breathe [1] 137/4
brief [3] 17/3 70/16 70/25
briefed [1] 22/13
bring [6] 9/15 20/19 32/9 75/17 76/9 116/16
bringing [1] 29/7
brings [1] 9/19
brought [1] 130/12
Brunzell [4] 65/24 65/25 66/5 111/16
BURSEY [183]
Bursey's [15] 7/20 22/18 41/3 41/25 42/5 42/24 74/21 75/23 76/6 79/13 84/6 86/22 89/19 92/9 106/13
Burseys [1] 17/21
business [1] 2/15
busy [1] 25/4
but [113] 3/1 3/10 3/16 4/5 4/13 4/25 4/25 5/17 5/23 6/18 7/3 7/6 7/22 8/2 8/8 8/17 9/2 9/7 10/23 11/2 12/7 12/20 13/7 13/22 14/2 14/7 14/9 14/10 15/3 16/1 16/10 16/15 17/1 17/8 18/10 18/15 19/2 19/16 20/2 21/1 22/16 22/18 22/20 24/16 26/3 27/12 29/22 30/24 32/9 32/25 34/11 35/4 38/15 41/1 43/9 45/19 52/12 52/13 55/18 57/4 60/10 62/17 63/2 64/21 65/24 66/3 66/8 66/9 67/6 68/14 69/5 73/22 79/18 79/25 81/7 81/24 83/10 86/17 89/5 89/11 90/11 94/23 96/2 96/15 96/24 100/15 100/23 101/4 101/11 102/13 102/17 105/23 108/16 110/7 110/14 112/23 113/2 115/1 118/3 119/11 120/6 122/14 125/18 125/19 125/21 127/19 130/4 130/5 134/9 137/8 137/15 141/8 144/2
buy [2] 74/23 75/9

C

Cadle [3] 65/23 66/6 111/16
calculate [1] 103/2
calculated [1] 64/1
calculating [1] 100/18
calculation [3] 97/22 97/25 110/14
calculator [1] 55/13
calendar [5] 2/21 7/8 16/6 18/6 32/12
call [5] 7/8 24/8 32/12 33/24 37/11
called [1] 38/2
came [11] 11/6 79/13 105/16 105/19 106/19 106/21 108/25 109/18 110/10 114/17 123/15
can [83] 3/7 3/19 4/13 5/3 7/24 8/7 8/10 12/23 14/24 16/11 16/11 17/7 19/14 19/15 20/3 20/9 21/17 22/20 24/7 24/8 24/8 24/15 24/25 25/1 25/14 25/14 25/17 26/10 26/12 26/17 26/20 27/25 28/1 28/22 30/20 32/19 33/3 33/24 35/9 35/20 37/12 37/19 37/23 43/11 44/12 52/6 52/19 53/3 55/17 55/18 58/7 63/2 63/3 64/6 68/22 69/14 81/6 81/17 85/4 85/10 87/3 87/4 97/1 99/8 100/12 103/9 103/10 103/11 104/19 105/7 105/7 108/13 115/17 116/16 117/11 118/9 120/5 122/12 123/24 125/19 137/19 139/16 141/3
can't [11] 5/16 12/18 19/2 24/17 30/5 65/19 65/20 74/1 102/13 125/19 134/11
cancel [1] 42/17
Candle [1] 65/22
cannot [1] 26/6
car [1] 24/17
Cardel [1] 65/21
case [21] 1/5 6/3 8/7 10/22 14/4 14/5 14/18 16/15 17/12 25/23 27/3 27/12 27/13 30/7 34/9 57/8 65/20 88/12 101/4 101/15 144/11
cases [5] 14/1 14/6 17/8 17/12 34/17
catch [2] 133/4 141/22
Category [3] 50/4 50/19 50/23
caught [1] 124/6
cause [21] 41/1 45/16 46/24 47/25 48/23 49/2 51/21 64/20 66/13 66/17 67/2 91/14 92/12 93/16 93/22 94/2 94/3 96/18 111/6 142/19 142/23
causes [1] 91/11
CC'd [1] 4/20
certain [3] 7/21 68/12 85/11
certainly [3] 13/21 19/19 53/4
certainty [1] 22/5
certification [1] 18/25
certified [4] 116/17 116/18 116/23 116/25
certifies [1] 43/20
certify [1] 144/9
chain [2] 15/5 [illegible]
challenges [1] 12/13
chance [3] 10/1 30/23 58/2
change [1] 113/23
changed [1] 13/4
changing [1] 113/13
chapter [2] 15/17 15/18
charge [6] 15/16 96/3 96/4 96/10 96/12 96/13
chart [10] 52/15 52/17 54/18 61/9 77/21 77/23 130/6 130/7 130/8 130/12
check [2] 30/13 129/21
child [4] 75/18 75/18 75/19 76/10
CHILDS [61] 1/16 2/5 2/7 2/24 4/2 4/7 4/10 10/19 11/2 11/20 13/19 14/12 20/15 21/10 21/18 22/2 22/12 22/17 22/25 23/19 25/3 26/3 26/18 27/24 28/6 28/17 29/1 29/6 30/5 31/6 32/3 33/20 35/10 36/5 37/2 37/8 38/8 39/5 67/24 67/25 68/3 72/12 73/14 78/4 81/4 81/25 82/20 96/21 103/15 104/16 105/20 110/1 110/24 114/3 123/9 125/22 129/20 130/11 133/5 140/2 142/6
Childs' [4] 12/15 27/20 28/11 30/7
chore [1] 36/8
chose [1] 11/2
chronological [3] 36/3 140/13 140/17
Circle [1] 71/17
circulate [2] 10/24 10/25
circulated [2] 11/16 15/25
cite [1] 47/3
cited [2] 7/11 15/4
civil [5] 40/25 45/17 64/22 92/13 111/7
claim [62] 13/9 17/23 18/17 59/3 82/6 82/7 87/14 87/15 87/19 87/21 87/24 88/3 88/15 89/20 89/22 90/13 107/13 109/3 117/22 118/1 118/17 118/22 118/23 121/14 121/15 121/25 123/2 126/5 126/7 126/11 126/15 126/25 127/1 127/21 127/22 128/6 128/9 128/13 128/18 128/24 129/18 130/1 131/3 131/12 133/1 133/12 133/15 133/23 134/3 134/8 135/5 135/8 135/11 136/1 136/3 136/3 136/5 137/21 138/17 138/18 138/23 142/18
claimant [6] 2/14 19/25 33/12 33/17 91/19 91/20
claims [9] 8/19 8/20 8/20 9/3 10/21 10/21 12/17 20/19 23/17
clarified [1] 21/17
CLARK [10] 1/2 2/1 69/21 70/18 71/2 120/21 120/23 123/5 127/10 138/25
class [2] 47/25 48/4
clean [2] 69/6 80/2
clear [7] 21/20 22/7 28/18 32/11 43/5 104/6 118/9
clearer [1] 38/20
clearly [1] 12/25
clerk [12] 6/18 35/12 37/25 86/9 100/12 102/2 102/15 102/19 126/22 140/20 141/23 142/2
clerks [1] 14/20
client [20] 2/6 5/19 6/3 8/8 8/10 16/21 19/2 19/15 19/17 23/20 24/11 24/23 30/7 46/21 74/15 77/17 97/15 99/11 100/24 103/15
client's [7] 8/7 20/12 22/3 24/15 26/9 26/21 59/5
clients [1] 21/6
clip [1] 106/1
closely [1] 18/24
closer [2] 10/10 66/9
coat [2] 125/11 125/20
code [2] 75/17 76/9
cognizant [3] 10/12 12/6 21/13
collar [2] 50/10 50/14
collectively [1] 70/13
color [1] 69/14
Colusa [8] 41/7 71/5 71/17 74/23 75/10 84/10 88/8 130/1
come [15] 12/21 12/21 13/21 25/2 25/18 27/15 33/21 41/1 58/10 75/25 80/2 96/6 102/20 112/2 124/19
comes [1] 40/24
comfort [1] 67/25
coming [4] 10/13 24/21 31/1 110/14
commit [2] 49/10 94/14
committed [1] 50/24
committing [4] 49/13 49/25 94/18 95/19
company [3] 19/9 19/10 80/2
compensatory [1] 99/10
complaint [22] 7/21 8/24 9/5 18/11 18/14 24/22 24/25 25/16 [illegible] 37/14 38/10 40/25 44/20 45/13 69/8 69/19 69/20 70/6 72/15

C

complaint... [2] 91/18 131/17
complete [2] 41/18 85/21
completed [1] 105/10
completely [4] 14/2 20/20 25/7 25/13
complex [3] 8/18 9/2 21/2
complexity [1] 20/16
complicated [3] 14/4 14/17 16/15
complied [7] 42/23 43/2 43/24 51/3 51/5 106/12 106/23
compliments [1] 28/16
comply [1] 6/7
complying [1] 47/16
concern [2] 8/22 18/23
concerned [2] 4/7 12/19
concerning [5] 42/24 43/3 106/13 106/24 126/3
concerns [1] 5/13
concert [3] 46/5 65/10 92/20
concerted [5] 46/7 46/12 91/7 92/25 93/4
concluded [1] 144/7
conclusions [3] 11/12 88/11 143/8
confirm [2] 74/13 77/15
confirmed [2] 81/23 89/21
confirming [1] 80/9
confuse [1] 9/1
confusing [6] 8/19 20/20 20/22 100/13 134/9 138/3
consequential [1] 93/9
consistent [3] 56/22 88/2 143/12
conspiracy [10] 41/1 45/17 64/22 92/14 96/3 96/4 96/10 111/7 124/21 124/23
conspired [4] 18/11 41/2 69/5 84/6
conspiring [2] 49/14 94/19
constructive [2] 90/23 91/1
contents [1] 44/6
context [2] 10/14 11/3
continuance [1] 25/18
continue [3] 21/12 24/6 25/17
continuing [1] 24/19
contract [4] 53/8 53/12 53/15 89/8
contradict [2] 42/1 86/22
control [1] 47/19
conveyance [2] 15/16 91/14
copier [1] 71/24
copious [1] 137/5
copy [24] 2/25 41/18 41/23 41/24 41/25 43/18 44/7 57/2 57/5 57/14 57/16 85/21 86/19 86/21 87/24 102/10 104/1 104/16 104/24 105/3 116/17 116/23 116/25 126/1
correct [50] 16/15 22/3 31/4 31/5 31/8 31/9 41/18 45/5 47/13 48/5 49/4 53/17 56/14 57/6 61/24 63/18 67/18 69/21 75/20 75/21 78/6 79/15 79/22 79/23 80/5 80/6 80/18 82/9 84/24 85/21 88/10 88/20 91/9 91/23 91/25 92/21 93/3 93/15 93/20 96/5 98/21 99/5 109/21 111/20 115/9 129/7 129/20 129/22 133/25 134/15
correctly [3] 29/10 29/12 144/9
cost [3] 46/21 52/1 101/8
costs [12] 48/20 52/6 65/23 66/6 93/10 93/14 100/25 101/16 101/18 111/16 111/20 143/1
could [18] 5/6 7/9 8/2 8/4 12/3 13/7 17/1 20/2 20/7 20/8 22/1 24/23 35/8 38/4 53/4 75/16 76/9 105/24
counsel [6] 8/15 20/10 28/6 32/11 33/25 34/22
counted [1] 110/4
county [14] 1/2 2/1 43/22 43/22 69/12 69/21 69/23 70/18 71/2 120/21 120/23 123/5 127/10 138/25
couple [4] 8/16 10/7 20/17 66/11
course [8] 4/6 19/13 26/8 26/20 27/8 37/20 37/22 69/5
court [56] 1/2 1/11 1/24 2/14 5/4 5/7 6/2 6/2 6/11 6/14 7/9 7/23 8/18 8/23 10/12 10/20 11/8 11/19 12/8 12/12 12/20 12/23 13/13 21/22 21/25 22/1 22/12 23/2 24/5 25/22 27/19 27/21 28/22 28/23 29/3 29/9 29/22 29/25 30/3 31/18 31/20 33/13 34/13 38/22 41/25 43/5 66/4 66/9 68/2 86/22 97/24 102/4 103/14 110/17 125/19 129/24
Court's [9] 10/13 13/8 21/13 21/20 23/16 25/22 26/2 26/4 77/7
cover [4] 44/25 60/19 107/23 140/6
crawl [2] 24/18 24/18
crazy [2] 134/6 138/1
create [1] 36/15
created [1] 82/17
credible [1] 44/7
credit [4] 54/11 62/12 98/25 99/3
crime [1] 50/10
crimes [1] 50/14
criminal [12] 49/8 49/9 49/19 49/21 50/17 50/18 50/20 50/22 94/12 94/13 95/8 95/14
critical [1] 23/17
cross [6] 2/14 8/20 13/9 19/25 33/12 33/17
cross-claim [1] 13/9
cross-claimant [4] 2/14 19/25 33/12 33/17
cross-claims [1] 8/20
crystalized [1] 11/23
cumbersome [1] 6/11
current [2] 19/6 32/8
cut [1] 14/12

D

D-a-t-t-a-l-a [1] 38/6
damaged [3] 46/17 48/11 93/7
damages [20] 8/25 38/17 46/19 48/8 51/24 51/25 52/18 89/8 92/9 93/9 97/7 97/17 99/11 99/13 99/14 99/17 99/18 142/18 142/24 142/25
date [11] 16/5 80/17 103/23 103/23 103/24 105/8 117/2 120/6 120/19 129/10 131/15
dated [18] 42/22 43/1 76/18 79/2 83/19 106/11 106/22 114/19 115/5 120/4 131/14 132/2 134/2 135/3 135/13 136/9 139/4 139/23
DATTALA [106] 1/4 1/16 2/6 12/2 17/22 20/7 37/10 37/23 38/1 38/6 41/5 42/19 44/24 46/15 47/25 53/12 55/5 61/5 64/17 70/11 70/12 71/13 71/21 71/22 71/24 72/2 72/2 72/4 72/5 72/8 73/4 73/8 73/10 73/18 73/22 73/25 74/15 74/20 74/24 74/24 75/2 75/15 75/16 75/20 76/3 76/7 76/13 76/17 77/15 78/9 78/13 78/18 79/1 79/9 79/10 79/14 79/18 79/22 80/1 80/8 80/12 80/14 81/21 81/22 82/3 82/5 82/11 82/[illegible] 83/19 83/21 84/8 84/22 84/24 87/18 88/14 88/20 89/9 89/15 89/21 90/22 91/23 91/25 97/8 99/2 101/12 101/17 103/16 109/2 109/20 110/2 110/11 111/18 111/19 112/10 113/11 117/14 117/16 117/19 117/21 117/24 126/8 132/5 142/13 143/2 144/1
Dattala's [16] 25/23 41/4 41/19 42/1 43/3 45/2 49/24 60/19 72/2 83/17 84/7 85/22 86/23 95/19 106/24 108/1
David [1] 44/5
day [7] 16/8 32/13 33/25 34/22 81/2 117/18 129/8
day's [1] 5/16
days [4] 6/8 11/25 11/25 12/3
dealing [2] 21/4 26/5
dealings [2] 71/13 71/21
dealt [3] 23/23 24/1 24/2
deceased [1] 74/22
decided [1] 111/16
decipher [1] 9/13
decision [3] 15/23 23/16 25/23
declaration [5] 89/16 94/19 94/24 133/9 141/17
declarations [1] 49/14
declaratory [5] 91/11 141/4 141/5 141/14 141/15
declared [1] 15/17
dedicated [1] 14/9
deducted [2] 54/14 142/8
deducting [1] 142/16
deed [134] 15/4 17/23 18/17 18/18 19/11 22/11 59/3 59/4 59/6 72/8 72/9 72/9 73/11 73/11 73/11 73/20 73/24 74/8 76/18 76/23 77/8 79/1 80/14 80/14 82/6 82/7 82/15 82/16 82/17 82/18 82/22 82/23 83/22 87/16 87/19 87/21 88/15 90/2 90/17 107/13 109/3 112/9 112/12 113/1 113/10 113/12 113/15 113/25 114/4 114/7 114/9 114/14 114/18 115/4 115/25 117/15 117/15 117/22 118/17 118/22 118/23 119/22 120/1 120/3 121/15 121/15 122/1 123/2 123/4 123/10 124/3 126/7 126/13 126/15 127/1 127/3 127/9 128/8 128/14 128/18 128/24 129/18 130/17 130/25 131/3 131/6 131/8 131/12 131/12 131/24 131/25 132/1 132/4 132/16 132/17 132/23 133/1 133/3 133/12 133/15 133/20 133/23 134/1 134/3 134/8 134/14 135/3 135/5 135/8 135/12 135/12 136/1 136/1 136/2 136/3 136/3 136/5 136/8 136/13 136/14 136/18 137/10 137/13 137/21 137/22 138/17 138/19 138/24 139/3 139/8 139/12 139/17 139/20 141/25
deeds [14] 87/14 87/24 88/3 89/20 89/22 95/3 118/1 126/5 126/25 127/21 127/22 128/10 138/21 141/18
deemed [3] 9/5 9/7 20/18
default [24] 6/6 6/9 6/9 6/10 6/15 8/1 22/19 23/3 23/22 28/12 28/19 29/3 29/17 31/20 31/21 32/20 33/6 37/2 39/16 69/3 103/18 110/5 110/19 142/15
defaulting [2] 29/16 68/6
defaults [1] 30/3
defendant [15] 1/9 19/22 33/16 33/17 49/19 50/16 50/20 94/3 94/11 95/8 96/20 97/1 131/4 131/13 132/20
defendants [12] 5/21 5/24 7/1 19/17 20/8 24/11 26/23 45/17 51/22 101/19 103/19 124/22
defined [1] 51/20
definitely [1] 59/10
definition [1] 110/23
defraud [2] 92/5 92/8
defrauded [3] 17/22 88/14 109/2
delay [2] 92/5 92/8
demand [1] 142/17
denying [1] 3/10
depo [3] 81/17 118/21 122/6
deposit [4] 54/23 78/10 78/19 142/9
deposition [35] 81/11 82/25 116/8 117/2 117/23 118/16 118/16 121/4 122/5 122/16 122/18 122/20 122/25 123/4 123/24 127/1 127/3 127/6 128/16 128/22 129/1 129/6 129/9 129/17 133/14 134/2 134/13 135/18 135/22 135/23 136/2

D

deposition... [4] 138/16 138/16 138/20 138/24
DEPT [1] 1/6
describe [3] 104/19 105/7 105/24
described [30] 40/5 41/3 41/14 41/20 42/2 42/25 43/4 43/17 43/19 46/4 46/10 47/15 47/23 49/25 50/25 51/8 70/12 71/14 72/3 82/17 83/23 84/23 85/23 86/24 92/19 93/2 95/20 106/14 106/25 111/9
describes [1] 49/7
describing [1] 69/11
description [3] 70/17 70/25 71/10
despite [1] 90/4
detailed [2] 122/12 143/7
details [1] 102/18
determine [1] 13/4
determined [3] 9/25 21/22 93/10
did [39] 4/25 9/10 10/23 10/24 10/25 13/14 41/11 51/11 63/20 71/25 73/18 73/25 74/3 74/9 75/2 75/5 75/8 78/16 78/24 81/1 81/1 81/21 82/3 82/7 82/12 82/16 84/22 84/24 87/9 106/20 114/23 117/19 117/25 118/2 121/18 122/15 126/19 140/8 140/9
didn't [18] 6/18 6/19 7/4 7/5 7/6 7/7 7/7 18/24 22/18 24/4 25/8 25/10 36/13 64/10 77/22 112/16 115/2 141/8
died [3] 74/21 75/3 75/24
different [14] 17/11 57/22 57/25 59/24 60/22 67/5 69/14 93/24 98/1 105/4 105/5 106/10 106/11 112/5
differently [2] 21/5 60/3
difficult [9] 3/15 6/3 9/12 9/21 14/2 14/8 17/10 34/16 134/5
difficulty [1] 12/11
diligently [1] 13/6
direct [2] 51/21 51/22
direction [1] 9/17
disallowing [1] 110/17
discretion [3] 12/23 26/4 27/21
discuss [6] 3/8 5/10 10/23 21/5 130/7 130/13
discussed [20] 8/9 16/20 16/21 57/12 60/2 65/8 65/15 66/21 66/21 67/20 86/15 110/25 111/1 115/2 124/21 126/3 127/18 127/19 130/9 142/5
discusses [2] 4/11 57/5
discussing [4] 13/20 110/22 127/20 142/3
discussion [1] 68/4
discussions [2] 9/22 10/19
dispute [1] 15/3
distinction [1] 29/15
distinguish [2] 9/13 69/14
DISTRICT [2] 1/2 1/11
dividing [1] 21/7
do [131] 3/5 3/7 6/9 8/4 9/8 11/20 12/3 12/4 16/16 22/7 22/20 24/7 24/19 24/19 25/23 26/1 26/12 26/12 26/17 28/10 28/22 29/1 30/24 33/20 35/4 37/11 39/11 40/15 40/19 43/7 43/9 43/12 48/13 52/21 55/13 55/18 56/1 56/4 58/1 58/3 58/13 61/13 62/5 62/5 62/21 64/6 66/2 66/3 67/23 68/7 68/7 68/20 68/25 70/8 74/13 76/21 77/20 77/23 77/24 80/17 80/19 80/21 81/10 82/6 82/20 84/14 84/15 86/2 87/2 87/5 87/23 90/19 90/25 93/18 93/19 94/23 94/23 94/24 97/22 97/25 100/7 100/7 100/7 101/24 101/25 102/12 102/13 102/18 105/20 105/21 105/25 108/10 108/18 111/10 111/23 111/25 112/3 112/12 115/24 115/24 115/25 118/4 119/2 122/17 122/17 124/19 125/9 125/11 127/14 127/25 128/18 128/22 130/1 130/14 130/20 130/25 131/25 132/7 134/1 137/8 137/24 139/7 139/13 140/10 141/8 141/10 141/13 141/14 142/2 143/4 144/9
docket [1] 21/20
doctrine [1] 48/9
document [23] 18/20 24/25 38/13 41/9 49/17 77/13 78/14 78/15 79/6 81/7 83/18 84/12 86/9 86/10 95/5 105/18 107/13 116/14 119/6 121/10 121/12 137/17 137/18
documents [39] 18/20 41/4 49/12 49/12 49/15 49/16 49/22 50/25 52/19 52/20 58/24 58/25 71/22 71/23 77/16 80/3 80/13 80/15 80/24 81/8 81/9 82/5 82/14 83/3 84/7 84/15 87/18 94/17 94/17 94/21 94/21 95/17 117/14 117/17 117/21 120/15 120/18 126/7 137/19
does [16] 4/7 9/19 15/9 27/21 44/23 71/24 73/22 87/8 95/12 97/24 103/23 113/2 113/2 113/4 121/17 130/12
doesn't [10] 3/17 6/12 6/14 19/21 26/11 59/19 90/13 100/13 133/9 137/8
doing [12] 20/3 24/14 30/11 36/18 66/10 70/1 80/17 80/21 90/12 96/23 100/2 138/12
don't [136] 6/16 6/18 6/24 7/22 8/1 10/16 10/18 11/6 11/11 12/11 12/16 12/17 13/23 15/7 15/22 15/23 16/1 16/1 16/4 16/10 19/2 19/12 19/16 22/7 22/14 23/22 24/7 24/9 24/13 24/16 24/18 24/24 25/15 25/24 26/21 28/19 28/23 30/1 30/6 31/25 32/22 32/24 33/11 34/6 34/6 35/1 36/15 40/21 43/13 51/1 54/6 54/10 55/22 56/6 59/18 59/24 60/11 62/17 62/23 63/7 63/7 63/8 65/19 66/7 66/24 67/5 67/22 72/14 72/23 72/25 72/25 77/17 81/18 83/10 85/3 85/11 86/2 86/7 90/23 91/2 91/5 98/23 98/25 99/3 99/16 99/25 100/7 104/13 105/3 107/5 107/5 107/11 109/7 110/6 110/8 112/3 113/22 114/23 115/10 116/3 117/24 122/11 122/12 122/13 123/17 123/19 124/17 125/4 125/7 126/14 126/16 128/13 128/20 130/1 130/5 130/6 130/8 130/19 133/5 133/8 136/6 136/19 136/25 137/14 137/16 137/24 138/9 139/6 139/11 140/5 140/11 140/23 141/1 141/2 141/2 144/2
done [16] 3/15 7/4 11/20 30/9 36/18 52/22 55/20 57/13 86/8 125/22 131/22 137/6 142/1 143/2 143/5 144/4
doubting [2] 81/13 83/4
down [15] 37/23 39/15 53/21 54/1 56/20 64/25 79/12 83/8 87/3 89/12 109/10 113/1 118/21 128/9 142/16
drafted [2] 71/21 89/9
drafting [1] 71/23
drawing [2] 29/15 115/3
Drive [5] 70/14 70/16 70/22 70/24 71/5
ducks [1] 31/14
due [4] 31/2 48/10 91/20 91/21
duly [1] 38/2
duplicate [2] 136/23 136/25
duplication [1] 12/24
during [8] 39/6 63/13 64/6 68/15 96/20 96/23 106/21 108/25
duties [1] 43/23
duty [4] 44/6 47/9 47/14 66/22

E

each [13] 9/8 17/11 38/16 43/10 43/14 44/10 44/16 53/25 54/23 61/25 85/3 100/11 105/11
earlier [2] 41/4 142/5
earnest [8] 53/25 54/22 78/10 78/19 79/12 89/11 109/20 142/9
easier [2] 3/22 39/2
echo [1] 11/9
economy [1] 13/7
EDCR [4] 6/17 23/2 30/3 31/19
edification [1] 77/8
EDR [1] 6/16
educated [2] 29/10 30/22
efficient [3] 24/10 24/10 100/14
effort [3] 44/25 60/18 107/23
eight [1] 103/7
either [6] 44/23 44/24 45/1 60/19 87/7 107/25
eliminating [1] 20/12
else [11] 4/5 24/20 57/19 77/1 104/8 111/11 113/23 127/25 139/7 139/7 140/10
email [3] 3/22 18/24 71/25
emails [1] 12/1
emotion [1] 34/9
emotional [1] 83/9
empathizing [1] 14/17
emphasized [1] 20/17
emphatic [1] 116/14
emphatically [1] 23/21
employed [1] 40/3
employee [1] 47/21
employer [1] 47/19
employment [3] 40/4 47/21 56/8
encumbered [1] 82/18
encumbering [5] 72/11 73/13 73/21 74/8 114/5
end [6] 12/22 43/24 44/21 73/11 75/19 76/10
ends [1] 121/21
enforceability [2] 49/18 95/6
engaged [13] 46/7 46/12 49/9 49/19 50/16 50/20 51/19 91/6 92/24 93/4 94/11 94/13 95/8
engaging [5] 49/8 49/20 50/18 50/22 95/14
enough [4] 9/2 108/19 116/24 122/7
ensure [1] 19/7
enter [6] 22/19 23/22 28/19 44/16 76/3 76/13
entered [2] 32/21 124/20
enterprise [6] 49/8 49/20 50/17 50/21 94/12 95/9
enters [1] 31/20
entire [3] 66/10 104/7 122/18
entirety [1] 122/24
entitled [6] 10/22 19/19 46/21 83/18 83/22 144/10
entry [1] 44/7
equally [1] 15/18
equals [2] 64/12 65/1
error [1] 12/20
ESCOBAR [1] 1/11
escort [1] 32/19
escrow [4] 46/9 87/13 93/1 126/4
especially [3] 6/4 9/4 29/2
ESQ [3] 1/16 1/18 1/21
essentially [1] 8/4
establish [2] 89/8 97/7
estate [12] 49/11 49/16 49/21 70/8 71/23 74/22 74/25 75/6 79/10 94/17 94/21 95/16
estimate [1] 11/24
ethical [6] 6/7 6/12 6/15 28/18 28/23 30/13
EUSTACHIUS [2] 1/7 7/2
eve [2] 3/15 16/14
even [12] 10/17 12/11 13/23 21/3 24/17 24/24 25/15 71/24 99/16 119/10 122/11 122/13
ever [1] 73/23
every [3] 15/5 15/16 96/25
everybody [6] 4/20 5/1

E

everybody... [4] 5/3 5/6 14/20 20/21
everything [20] 3/23 12/22 13/6 23/15 27/22 30/11 40/13 40/18 55/20 57/1 58/9 58/11 65/4 67/17 102/2 102/8 104/8 107/18 140/7 143/8
everything's [2] 64/7 143/12
evidence [25] 12/15 20/20 46/5 51/7 61/13 62/5 62/6 62/14 62/15 62/21 65/14 66/25 69/4 88/2 92/19 102/19 109/18 109/19 109/19 110/1 110/3 110/8 110/10 123/22 130/9
evidences [1] 82/21
ex [1] 4/20
exactly [4] 13/22 23/20 39/1 108/6
exam [1] 17/17
except [5] 44/9 44/18 66/25 104/8 130/13
exceptions [1] 44/8
excerpt [4] 108/7 108/23 124/24 125/4
excess [3] 46/19 48/12 93/9
exclamation [1] 105/10
exclusive [2] 51/25 93/10
excuse [8] 23/1 39/10 84/19 109/1 115/8 116/9 133/15 137/3
executed [2] 73/23 89/18
executing [6] 49/13 49/25 50/24 51/8 94/18 95/20
exercise [1] 101/15
exhibit [162]
Exhibit 4 [1] 123/4
exhibits [27] 12/21 35/18 36/5 43/7 43/11 52/22 52/23 55/24 56/2 56/15 58/1 65/9 67/10 67/22 68/5 77/9 79/4 81/4 82/21 83/7 85/24 103/16 117/12 124/10 140/5 140/6 140/17
expected [2] 74/21 75/6
expert [2] 104/13 124/24
explaining [1] 130/11
express [1] 75/8
extensively [2] 16/21 22/13
extra [1] 114/13

F

fabricate [2] 49/15 94/20
fact [11] 11/12 13/24 18/16 18/20 21/9 40/13 41/5 88/11 94/14 130/13 143/8
factored [1] 98/19
facts [14] 7/21 7/24 8/5 8/6 9/4 9/7 9/10 12/21 17/21 20/18 21/4 21/4 40/2 45/18
factual [4] 7/13 41/6 74/20 84/9
failure [1] 23/1
false [11] 18/12 49/10 49/13 51/7 75/25 76/2 76/11 76/12 94/13 94/19 94/24
falsely [5] 42/23 43/2 49/21 95/16 106/22
far [10] 7/12 7/12 7/23 19/15 20/7 26/23 58/6 96/7 113/23 140/13
fashion [2] 38/23 38/24
father [3] 74/21 75/3 75/24
father's [4] 74/22 74/25 75/6 79/10
February [10] 11/19 13/15 13/18 19/16 25/4 26/5 27/22 32/7 32/10 36/24
feel [1] 34/6
feeling [1] 144/2
fees [12] 46/21 52/6 65/17 65/18 66/5 93/14 100/25 101/15 101/18 111/15 111/20 143/1
felony [3] 50/4 50/19 50/23
ferret [1] 12/22
few [1] 34/21
fifth [2] 66/17 93/16
file [5] 6/19 7/4 7/6 10/18 19/19
filed [28] 2/23 4/2 9/18 17/21 17/25 18/5 20/1 24/25 25/10 38/12 41/25 42/4 42/15 42/17 42/19 42/20 44/22 57/7 57/15 57/16 58/22 58/23 86/10 86/21 88/12 105/18 107/12 124/22
filer [1] 105/11
filing [3] 104/2 104/4 104/7
final [4] 10/17 11/15 18/23 27/25
finality [2] 22/22 23/16
finalize [1] 21/18
finalized [1] 11/11
financial [3] 49/11 88/7 94/17
find [1] 43/14
findings [4] 11/12 19/6 88/11 143/8
fine [12] 17/8 37/24 44/3 96/9 100/4 103/13 103/13 104/11 125/13 125/13 134/20 138/2
finish [2] 17/1 130/10
first [17] 5/9 10/7 10/11 16/13 29/24 32/1 38/2 38/5 56/6 56/14 83/15 91/11 91/16 92/16 126/2 133/12 135/11
fit [1] 10/22
five [10] 17/12 24/16 30/11 47/4 48/15 101/1 103/8 107/5 107/7 108/5
fix [2] 75/16 76/8
fixated [1] 50/11
follow [1] 124/22
followed [1] 66/6
following [3] 18/4 74/20 142/6
follows [3] 31/22 38/3 44/5
forge [3] 45/2 60/19 108/1
forged [12] 45/1 46/4 49/12 59/4 60/19 61/4 65/6 83/17 92/18 94/17 107/25 111/9
forging [6] 41/4 49/11 49/24 84/6 94/16 95/19
forgive [10] 14/12 23/12 23/25 28/15 28/15 62/16 66/16 75/9 99/2 106/20
forgot [1] 73/2
form [3] 133/10 141/16 141/17
forms [6] 49/14 89/16 94/19 94/25 141/4 141/5
formulate [1] 9/22
forth [8] 17/11 40/17 46/3 87/15 87/16 88/17 89/1 117/22
fortunately [1] 128/25
forward [17] 8/7 8/8 8/25 19/15 20/8 20/9 21/13 22/4 24/9 25/1 30/8 37/4 38/23 62/4 97/2 107/21 130/16
found [1] 16/7
four [2] 58/6 97/10
fourth [3] 45/16 92/12 111/6
framework [1] 22/2
frank [1] 14/10
frankly [6] 4/3 12/11 18/24 20/22 30/22 39/2
fraud [4] 49/10 94/14 99/17 110/18
fraudulent [5] 15/4 41/3 84/6 91/14 99/5
fraudulently [1] 18/17
front [3] 10/25 33/19 38/11
full [10] 91/20 91/21 119/22 120/2 120/3 123/4 127/3 127/9 138/24 141/8
fully [2] 29/9 46/3
further [2] 41/3 84/6
future [5] 3/25 24/14 24/14 25/14 35/2

G

gave [3] 63/24 77/21 140/15
general [5] 46/19 51/24 51/24 91/16 93/9
generated [1] 59/9
genuineness [2] 49/17 95/6
get [37] 3/19 3/20 13/6 16/11 19/1 19/14 22/16 24/18 25/14 26/19 26/19 27/16 27/25 34/25 39/9 40/8 45/7 48/16 52/1 52/9 54/11 59/5 67/15 68/7 75/17 76/9 98/25 99/3 99/17 102/1 103/8 104/7 106/3 134/9 138/1 141/8 143/9
gets [1] 62/12
getting [5] 10/20 17/3 70/3 77/24 139/22
give [24] 6/8 28/20 29/11 35/15 37/11 45/4 49/6 49/16 51/9 52/9 58/4 58/18 61/2 68/20 69/13 95/5 102/15 102/19 106/3 110/20 140/12 141/3 142/14 142/14
given [4] 16/12 32/8 101/15 115/18
gives [2] 99/13 108/12
go [125] 3/11 6/21 7/15 7/16 7/18 7/18 7/23 8/7 8/8 11/6 13/3 17/5 17/5 18/15 19/9 19/15 20/8 20/9 21/17 22/17 24/8 25/1 25/2 25/17 26/13 29/16 31/24 32/13 38/16 39/11 39/15 40/1 41/10 42/8 43/10 45/11 45/15 45/19 45/23 49/1 51/15 51/18 52/19 53/5 54/6 54/8 55/20 55/23 55/24 56/5 56/10 57/12 57/23 58/20 58/22 59/18 60/18 61/8 64/19 67/2 67/4 68/24 69/2 69/15 69/24 72/12 72/23 73/1 73/17 75/1 75/13 75/22 77/14 78/3 80/11 81/20 81/25 83/16 84/4 84/20 85/10 85/18 86/25 87/9 87/12 88/6 88/6 89/24 90/14 90/23 91/10 91/13 92/2 92/12 93/15 95/22 97/5 98/10 99/9 99/16 99/22 100/11 101/23 102/20 104/14 105/15 106/18 109/25 110/20 110/24 111/3 111/8 111/15 113/24 114/1 114/16 114/16 115/20 118/11 124/8 125/25 129/28 137/6 139/2 141/2
goes [5] 7/12 [illegible]
56/15 59/22 89/7
going [97] 3/21 6/3 8/25 9/6 11/20 11/22 13/3 16/14 19/6 19/8 19/16 20/16 21/9 23/21 23/21 25/4 25/5 25/22 30/17 31/23 31/24 31/25 32/6 32/20 32/25 35/1 38/9 39/15 39/23 40/16 41/1 43/9 43/10 45/19 45/23 47/6 48/12 48/13 48/15 48/16 56/5 56/16 56/22 57/1 59/10 60/20 62/5 63/5 65/16 66/11 67/15 68/12 69/13 71/9 73/6 73/14 74/18 75/10 84/13 86/3 86/18 92/23 97/7 97/21 99/19 99/22 101/1 101/7 101/8 101/8 102/10 103/16 103/16 103/21 107/8 108/24 109/4 109/18 109/23 110/4 111/22 116/5 117/25 125/14 125/21 126/12 129/16 129/17 130/7 130/8 131/17 132/6 136/23 137/1 138/7 140/20 142/11
gone [3] 67/1 68/4 123/21
good [49] 2/7 2/10 2/11 2/12 2/16 2/18 8/11 21/14 23/13 32/10 37/8 39/25 51/15 53/22 56/4 57/11 58/7 58/18 66/9 69/6 69/9 69/15 71/4 71/11 73/17 75/13 76/15 77/14 78/3 81/24 85/17 86/16 95/4 99/7 100/15 104/10 108/12 108/13 108/22 109/15 109/25 121/2 130/4 138/1 139/16 141/2 141/13 141/22 143/6
got [19] 5/23 16/8 21/1 24/19 35/16 35/23 39/14 43/16 52/24 53/16 55/13 55/21 57/17 68/16 70/1 81/19 83/8 100/10 141/19
grab [1] 121/3
grant [30] 12/23 16/14 90/2 90/17 128/7 130/17 130/24 131/5 131/8 131/12 132/16 132/23 133/2 133/13 133/19 134/1 134/13 135/2 135/12 136/1 136/8 136/13 136/14 136/18 137/12 137/22 139/3 139/12 139/17 139/19
granted [10] 7/13 10/16 15/11 23/6 29/13 37/2 65/17 100/21 [illegible] 142/24
grantor [17] 41/5 41/19 42/2 42/25 43/4 46/4

G

grantor... [11] 56/11 56/18 84/8 84/23 85/23 86/24 92/18 103/21 106/14 106/24 111/9
graph [3] 52/11 52/12 52/14
great [3] 14/8 33/25 34/22
guess [2] 6/1 19/2
guys [1] 12/16

H

had [44] 2/21 10/18 11/18 15/11 17/3 25/7 30/23 36/17 40/8 42/15 42/17 42/23 43/2 45/2 51/3 51/5 53/8 53/12 53/15 59/1 59/4 60/19 71/13 74/21 75/3 75/18 75/18 75/24 76/10 76/12 80/1 80/14 82/5 82/14 106/23 108/1 112/19 116/2 117/9 117/16 117/21 126/14 126/21 141/14
hadn't [1] 17/21
half [1] 22/15
hand [2] 37/24 140/19
handle [2] 10/3 10/22
handled [1] 23/18
Hansen [3] 7/3 7/5 28/22
happen [4] 3/18 8/2 22/2 35/2
happened [5] 59/3 63/14 120/10 120/13 131/14
happening [2] 2/21 66/7
happens [2] 8/8 121/20
happy [3] 13/12 34/19 143/11
hard [3] 10/13 11/5 14/9
harming [3] 46/14 91/8 93/6
has [45] 6/5 8/8 11/1 12/23 13/21 17/11 21/22 22/25 23/2 23/16 24/4 24/11 27/21 28/23 29/12 29/14 34/13 36/23 37/2 40/15 40/19 41/7 45/18 46/18 48/11 48/17 51/23 52/4 64/17 74/15 81/22 87/2 89/21 93/8 93/18 93/19 96/21 96/25 101/12 101/17 103/24 111/25 129/25 137/8 143/2
hashed [1] 19/18
hasn't [1] 26/7
hate [2] 140/22 141/1
have [282]
haven't [6] 7/4 16/2 16/2 30/22 30/23 115/18
having [5] 13/25 14/6 17/8 38/2 90/5
he [65] 7/6 10/19 10/22 12/16 15/11 15/12 19/24 22/18 22/20 24/8 24/15 24/17 24/18 25/7 25/14 26/25 26/25 27/4 27/9 27/21 29/10 29/12 37/4 37/19 41/11 53/8 53/9 53/15 53/18 53/20 54/9 54/15 62/6 63/2 63/3 63/6 63/17 63/21 69/20 75/5 75/8 75/10 75/16 75/18 75/24 75/25 76/8 76/10 76/11 77/15 77/17 78/16 78/18 78/24 79/1 79/10 80/3 80/24 89/2 90/11 100/25 103/11 117/14 120/11 120/15
he'd [1] 79/21
he'll [2] 22/20 63/4
he's [21] 8/10 10/22 15/14 20/16 24/8 24/21 25/14 27/2 27/8 27/15 29/15 48/4 63/2 63/4 63/5 64/17 69/11 69/22 101/3 101/5 138/4
hear [5] 4/8 5/13 32/1 64/10 77/22
heard [3] 9/25 18/1 42/16
hearing [18] 1/13 5/16 20/2 22/2 22/6 30/8 33/7 37/4 39/4 48/14 67/1 74/1 96/20 98/1 103/18 103/18 111/25 140/17
hears [4] 9/6 9/10 20/18 21/4
heirs [1] 15/19
held [1] 32/12
help [1] 36/17
her [35] 8/2 24/5 40/4 41/18 41/23 41/23 43/18 44/10 44/15 44/25 45/2 47/11 47/20 49/24 56/24 56/25 57/2 57/3 57/5 60/20 61/4 81/11 83/2 85/21 86/20 86/20 87/8 102/15 107/23 108/1 118/16 121/10 121/17 121/23 140/8
here [59] 2/25 4/4 4/5 4/11 5/19 5/24 6/16 7/8 7/8 7/11 8/3 8/10 11/8 12/25 13/22 15/7 19/8 20/2 22/3 23/17 24/7 24/8 24/12 24/15 24/18 24/21 25/6 25/14 25/17 27/16 30/5 30/12 35/23 37/10 45/3 49/7 54/5 56/19 59/21 61/22 83/11 83/14 86/9 103/8 103/10 103/11 103/15 107/12 109/3 111/23 115/4 115/11 123/15 130/2 130/9 133/11 134/25 137/9 138/10
here's [6] 2/20 5/17 18/21 35/6 101/23 101/25
hereby [1] 144/9
herein [3] 70/15 70/23 80/16
Hi [1] 8/12
high [1] 34/9
highlighted [1] 12/10
him [19] 6/8 8/10 9/7 27/5 27/7 27/15 27/16 27/16 29/16 37/11 37/15 48/2 63/8 63/20 77/16 77/18 91/21 101/7 141/4
hinder [2] 92/5 92/8
his [40] 7/13 10/21 10/21 10/22 22/3 24/17 24/17 27/21 29/17 44/10 44/15 53/18 53/24 69/3 69/3 70/14 71/21 74/22 74/25 74/25 75/3 75/6 75/11 75/24 75/25 79/9 79/10 79/19 79/21 80/15 90/1 90/9 90/16 92/3 92/6 103/15 117/16 130/23 137/12 140/9
hmm [24] 56/24 59/20 61/6 61/10 62/7 65/11 66/15 68/13 69/22 76/25 88/5 89/23 95/15 104/23 107/9 108/20 112/4 113/21 114/6 115/6 127/4 127/24 132/19 134/7
hold [17] 57/2 57/9 57/13 61/17 61/20 91/13 98/9 106/8 107/20 113/24 118/7 126/18 126/23 129/2 135/22 137/7 139/19
Homes [2] 70/17 71/1
honest [2] 8/19 16/12
Honor [16] 2/11 2/12 8/14 10/7 23/13 25/21 28/2 28/4 29/5 29/6 31/5 32/17 33/12 34/2 34/24 118/9
HONORABLE [1] 1/11
hope [2] 144/2 144/2
hopefully [1] 21/18
hoping [2] 12/21 20/2
hour [2] 16/22 33/10
hours [5] 22/14 22/15 101/1 134/11 134/11
house [1] 63/21
how [16] 3/20 6/2 8/18 9/6 14/1 16/13 20/18 24/9 25/2 66/2 89/1 89/2 119/4 133/8 134/21 140/9
however [2] 11/10 102/18
huge [1] 100/25
hum [1] 78/22
hundred [1] 66/4
hurry [2] 38/25 40/14

I

I'd [16] 2/3 13/12 19/13 28/18 32/4 32/9 34/12 35/22 37/10 53/5 77/15 88/1 96/6 100/8 140/12 140/19
I'll [14] 6/10 31/16 52/1 58/12 58/20 62/17 65/24 100/14 102/9 102/15 102/19 103/2 130/14 143/12
I'm [106] 3/9 5/2 5/17 6/1 6/13 10/12 11/8 12/6 12/19 13/24 13/25 14/10 14/10 14/14 15/5 15/7 16/2 16/14 17/2 17/5 17/23 18/10 19/20 20/3 20/13 22/2 23/10 25/1 25/7 25/18 28/15 28/20 30/5 30/11 30/15 30/17 31/24 34/6 34/19 35/4 36/4 38/9 39/15 39/23 47/6 48/16 50/11 50/11 51/9 51/12 52/10 54/4 54/18 55/4 56/5 56/20 56/25 60/10 63/15 64/10 65/16 66/3 67/15 68/12 69/7 69/13 70/3 70/3 71/9 73/3 81/13 83/4 83/6 83/8 85/10 93/23 96/9 96/12 97/21 102/10 102/12 103/4 105/23 108/15 108/22 109/13 113/12 115/3 115/20 118/15 122/11 125/19 128/11 130/7 130/8 131/7 131/17 132/10 133/6 134/4 134/5 134/23 136/23 137/25 138/8 140/25
I've [16] 4/9 8/9 16/20 16/21 21/1 34/21 36/11 36/12 36/17 36/18 55/13 66/8 66/8 66/9 100/6 135/1
idea [4] 22/19 56/4 58/7 72/2
identified [2] 8/17 84/14
identify [1] 3/21
if [90] 3/10 3/21 5/4 5/5 5/5 5/7 6/18 7/16 8/8 8/10 8/22 9/4 9/10 9/24 10/2 11/5 11/6 11/21 13/9 13/12 16/2 16/11 17/1 17/20 19/1 19/4 19/7 19/9 19/14 19/16 20/8 20/17 21/4 21/16 21/18 23/5 23/21 23/21 23/24 24/5 24/5 24/13 25/14 25/22 26/1 26/1 26/9 27/5 27/16 27/25 29/10 29/12 30/13 35/7 37/23 38/4 51/1 51/1 52/8 53/3 54/20 55/16 60/3 63/7 65/18 67/5 67/8 86/3 87/3 90/23 97/6 100/8 102/7 102/8 103/9 105/4 105/6 105/24 105/24 105/25 116/23 117/9 122/2 122/9 122/13 125/11 137/1 137/24 141/1 143/11
imagine [2] 3/20 60/20
immediately [8] 4/6 18/5 20/1 90/1 90/8 90/16 130/23 137/11
impacted [1] 11/2
implicated [1] 31/7
important [13] 3/20 39/25 41/13 47/24 50/5 57/21 88/8 96/2 102/17 117/1 117/8 123/6 142/20
impose [1] 90/22
imposes [2] 47/9 99/14
impossible [4] 9/13 20/21 20/24 21/7
in [270]
INC [1] 1/25
incapable [1] 71/22
included [1] 111/23
includes [3] 59/18 96/22 98/3
including [3] 14/20 17/22 142/15
inclusive [3] 49/22 50/3 95/17
inconsequential [3] 46/19 51/24 51/25
incorrect [1] 112/24
incur [1] 48/20
incurred [1] 48/8
indicate [2] 75/2 75/5
indicated [2] 67/13 77/3
indication [1] 12/16
indiscernible [9] 34/12 37/21 62/22 69/3 89/4 102/16 103/3 115/13 132/12
individual [7] 21/6 49/9 49/20 50/17 50/21 94/12 95/13
induce [2] 76/2 76/13
inform [1] 32/18
information [2] 111/24 137/16
inheritance [9] 74/22 74/25 75/6 75/11 75/25 79/9 79/13 79/19 79/21
injury [1] 48/2
INS [1] 1/18
inside [1] 27/13
instances [1] 11/16
instead [2] 89/11 113/13
instinct [1] 16/13
instruction [2] 7/19 7/22
instrument [1] 15/16
insurance [6] 46/9 [illegible] 87/13 93/2 126/4
insured [1] 59/6

I

intend [2] 78/16 78/25
intended [10] 46/13 48/1 48/3 82/4 82/6 82/13 82/16 91/7 93/5 117/20
intent [3] 6/8 92/5 92/8
interest [30] 21/21 52/1 54/10 54/11 55/1 62/19 64/1 64/4 64/5 76/20 89/13 90/1 90/5 90/9 90/16 92/3 92/6 93/10 98/8 98/18 98/23 99/4 110/4 110/17 110/17 111/1 115/8 115/10 130/24 137/12
interference [1] 45/7
interrupt [2] 35/4 43/14
interrupting [1] 14/14
into [18] 11/3 17/22 36/23 40/25 45/3 47/7 70/8 76/3 76/13 88/15 90/24 96/14 96/15 96/23 96/25 99/22 102/8 133/13
introduce [2] 129/16 130/2
introduced [2] 103/17 131/25
inventory [1] 61/22
invited [1] 12/20
involve [1] 96/19
involved [3] 20/21 27/2 110/18
involving [1] 71/23
is [379]
isn't [2] 15/7 107/7
issue [9] 9/15 14/6 16/13 19/7 19/18 29/3 29/7 30/4 115/18
issued [3] 49/23 50/4 95/18
issues [28] 5/12 6/4 6/12 6/15 8/18 8/18 9/1 9/2 9/20 9/20 10/2 10/15 11/11 11/22 12/2 12/25 17/11 19/4 21/8 21/11 21/16 21/19 22/12 22/23 30/4 37/1 55/1 88/7
it [269]
it'd [5] 29/21 39/2 117/8 132/11 136/20
it'll [1] 65/14
it's [160]
itemizing [1] 52/18
its [7] 29/25 34/13 86/3 108/19 109/14 122/24 141/14

J

J-o-h-n [1] 38/6
Janie [1] 144/14
January [2] 32/12 38/12
JD [1] 1/25
Jerry [2] 31/1 32/16
Jill [1] 32/18
Jill's [1] 32/25
Joel [2] 7/3 7/5
JOHN [10] 1/4 1/16 1/21 2/6 2/12 38/1 38/6 53/12 62/21 63/11
join [1] 7/7
joint [2] 10/25 11/23
journal [5] 44/5 44/10 44/15 51/6 66/20
JUDGE [16] 1/11 7/16 14/10 24/15 28/10 34/1 35/16 37/12 42/16 42/16 56/1 70/8 116/13 122/15 125/12 128/11
judgment [18] 5/22 10/16 11/12 15/11 15/23 18/23 19/1 22/8 26/20 31/21 32/21 37/2 69/3 88/12 103/18 110/5 110/19 142/4
judicial [3] 12/7 13/7 21/14
juggling [1] 28/9
July [1] 63/17
June [27] 41/25 42/5 42/10 42/11 42/12 42/13 42/20 43/2 43/6 44/22 57/7 57/9 59/13 59/17 72/6 72/7 73/8 73/9 73/19 73/19 86/10 86/22 104/2 104/17 104/24 106/22 107/16
jury [23] 2/20 4/2 7/19 7/22 8/24 9/1 9/5 9/6 9/10 9/13 10/3 12/3 12/22 20/17 20/18 21/4 24/8 31/1 31/3 31/23 32/19 36/23 38/21
just [158]
justify [1] 83/19

K

keep [13] 35/8 44/10 44/15 45/18 69/4 74/18 86/3 86/7 86/18 92/23 108/24 116/5 125/21
key [3] 47/11 86/11 121/7
kind [3] 10/20 20/17 28/8
kinds [1] 12/20
knew [4] 76/1 76/12 78/16 78/24
know [89] 3/25 7/10 7/23 9/9 9/23 10/11 11/4 11/6 11/11 11/15 11/24 12/7 12/15 12/21 12/24 16/7 16/10 16/16 17/7 17/9 21/19 21/25 22/11 22/14 22/20 22/24 23/2 24/16 25/2 25/8 25/10 27/14 30/21 31/11 34/6 35/1 36/9 36/11 36/14 36/14 36/17 39/9 45/21 50/8 50/12 51/1 52/20 54/7 58/1 60/3 60/10 65/19 65/21 66/2 66/3 66/3 67/6 67/8 68/10 68/19 72/14 74/2 82/3 82/12 83/5 83/10 83/10 84/14 85/4 90/23 96/8 97/24 100/13 101/2 101/4 105/4 108/10 108/16 110/14 115/10 117/19 117/25 122/11 122/13 130/6 134/8 141/10 141/13 144/2
knowingly [2] 49/9 94/13
knowledge [1] 9/9
knows [1] 8/18

L

LANCASTER [13] 1/18 2/8 2/10 11/9 12/10 23/11 23/12 23/14 28/6 28/14 28/17 29/1 29/2
language [1] 119/10
large [1] 101/10
LAS [6] 2/1 70/14 70/16 70/22 70/24 71/17
last [6] 10/13 38/5 74/10 74/12 142/21 142/22
late [3] 16/13 24/16 139/23
later [3] 4/5 25/19 41/1
latter [3] 74/19 75/3 75/23
law [5] 11/13 17/17 43/18 88/12 143/8
laws [5] 42/24 43/3 43/24 106/13 106/23
least [9] 4/4 11/22 35/25 49/8 49/20 50/17 50/21 94/12 95/13
leave [1] 32/4
leaves [2] 97/17 142/11
led [1] 59/9
left [2] 5/21 37/9
legal [4] 70/17 70/25 71/9 71/23
lengthy [1] 101/14
less [4] 5/16 12/9 97/8 97/9
let [33] 3/24 15/21 16/11 31/11 31/24 32/22 35/7 39/9 42/7 45/7 51/14 54/1 60/3 61/18 64/25 67/6 67/8 81/16 83/25 87/4 87/23 91/13 94/2 101/23 107/20 107/22 118/20 121/2 126/18 129/21 133/11 133/25 141/12
let's [98] 3/11 4/1 4/12 28/25 33/6 33/20 40/7 41/10 45/3 49/7 51/15 55/23 56/4 57/12 57/23 58/3 58/11 58/21 59/18 60/18 61/8 62/4 62/8 64/19 64/19 64/19 67/2 67/4 67/25 68/19 68/24 68/25 69/2 69/4 69/8 69/14 73/1 74/18 75/13 75/22 77/14 78/3 80/11 81/20 84/4 85/18 86/18 86/25 87/9 87/12 88/2 88/6 89/24 90/14 90/24 92/2 92/12 92/23 93/15 93/22 95/9 95/22 101/23 101/25 101/25 103/6 103/8 103/20 105/15 106/18 107/10 107/21 108/24 109/10 109/17 109/25 110/20 110/24 111/3 111/24 113/24 114/16 114/16 116/5 116/18 116/20 123/8 123/8 124/8 125/21 129/23 130/16 131/21 132/8 133/4 137/6 137/25 140/4 142/19
liable [1] 48/7
lien [1] 82/17
light [1] 10/15
like [42] 2/3 3/1 3/23 3/23 5/13 6/3 12/11 12/13 17/8 17/12 19/13 19/13 19/13 20/7 22/5 25/3 28/16 28/18 30/11 30/24 30/25 33/10 34/12 37/10 38/16 44/2 53/5 63/13 63/17 65/22 68/8 88/1 96/6 97/4 100/8 110/7 122/6 125/15 137/23 138/9 140/12 140/19
Lillian [7] 6/4 7/2 7/2 7/10 104/20 124/13 129/1
limine [7] 7/13 7/20 11/17 23/23 24/2 29/13 29/17
limines [1] 11/16
linchpin [1] 21/12
line [23] 17/4 17/6 17/20 18/21 21/7 49/1 51/17 51/17 61/1 66/17 67/3 69/19 70/5 91/17 94/7 102/2 114/3 115/3 118/15 121/24 124/8 127/16 131/9
linger [1] 9/8
lingering [1] 9/20
lis [1] 42/17
list [9] 56/1 58/11 58/14 58/15 60/11 68/5 72/20 100/16 116/8
listed [2] 68/11 72/13
listing [1] 68/11
literally [2] 16/7 101/1
literate [1] 71/22
little [12] 5/3 10/9 17/10 20/22 28/25 44/12 57/17 58/12 58/19 106/4 115/3 138/1
LLC [5] 90/1 130/24 131/13 135/3 135/13
local [10] 6/7 7/10 25/24 26/16 30/14 42/24 43/3 43/24 106/13 106/23
log [6] 44/22 44/22 57/2 57/5 60/14 126/1
logical [1] 23/8
long [5] 26/17 85/3 101/7 107/17 138/4
longer [1] 38/21
look [31] 3/22 6/18 7/17 8/19 18/24 35/22 38/20 39/12 51/15 52/8 57/1 67/5 68/22 87/4 108/14 113/3 114/3 116/4 118/4 128/10 128/10 129/25 132/1 132/1 134/6 135/2 135/6 138/15 141/12 142/2 143/11
looked [1] 9/16
looking [8] 13/24 40/20 54/16 66/9 86/7 109/16 131/7 132/10
looks [1] 137/23
loss [1] 44/8
lot [10] 5/6 10/3 14/24 34/11 40/15 40/19 70/17 70/25 85/9 144/1
louder [1] 10/10
lower [1] 85/16
luck [1] 144/1
lucky [2] 109/25 137/4
lunch [6] 2/20 4/3 33/10 58/7 64/6 81/17

M

Madam [8] 35/12 37/25 86/9 100/12 126/19 140/20 141/22 142/2
made [16] 11/9 11/10 22/25 47/2 65/13 66/23 66/24 72/8 74/10 74/19 76/1 76/2 76/11 76/12 89/18 130/5
Mainly [1] 47/10
maintain [1] 44/6
make [50] 8/17 8/23 15/21 23/6 23/7 25/22 28/19 30/10 30/11 30/20 31/10 31/13 35/17 36/22 37/7 40/14 40/17 42/7 53/22 55/16 55/19 56/1 58/11 58/14 58/15 62/8 64/14 68/19 69/6 79/21 81/15 81/17 83/6 83/7 83/11 83/25 87/4 96/16 97/4 97/21 100/8 106/1 109/7 113/20 122/24 123/24 130/7 130/14 138/10 139/16
makes [2] 26/11 50/2
making [10] 18/12 29/24 41/6 49/10 51/9 60/10 66/4 84/8 85/10 94/13
manageable [1] 10/3
management [1] 80/2
many [4] 3/20 14/5 [illegible] 13/19
March [4] 75/14 75/15 76/7 76/7

M

Mariah [1] 32/18
mark [6] 75/19 75/19 100/12 107/20 108/16 113/17
marked [1] 100/12
math [1] 64/14
mathematical [1] 52/15
may [14] 6/24 14/9 21/24 25/5 71/24 74/10 90/17 92/7 100/2 122/12 137/13 139/24 139/24 140/1
maybe [7] 9/7 37/9 58/7 59/2 94/23 96/2 128/25
me [101] 2/14 5/4 5/7 6/6 14/12 15/21 19/13 19/19 20/23 23/1 23/12 23/25 28/15 28/15 30/1 31/25 32/1 33/19 35/5 35/7 35/15 36/17 37/11 38/11 38/21 39/9 39/10 42/7 45/4 45/7 49/6 51/9 51/14 52/9 54/1 56/8 57/17 58/4 58/12 58/18 60/3 61/2 61/18 62/16 63/21 64/25 66/16 67/6 67/8 69/13 70/1 70/8 73/2 75/9 77/21 81/16 83/9 83/13 83/25 84/19 87/4 87/23 91/13 94/2 99/2 101/1 101/8 101/23 104/7 105/8 106/3 106/20 107/20 107/22 109/1 110/20 115/8 115/18 116/9 118/11 118/20 119/5 121/2 122/15 124/12 125/6 125/15 126/18 129/21 132/25 133/11 133/16 133/25 135/11 135/12 137/3 140/12 140/15 141/12 142/14 142/14
Meadow [2] 70/17 71/1
mean [20] 3/10 4/8 4/9 17/13 20/3 25/9 25/18 34/7 35/1 48/7 72/25 100/15 101/12 101/12 102/12 102/13 116/24 140/6 140/16 141/5
meantime [1] 32/14
Medina [79] 6/4 7/2 7/3 8/2 8/5 10/22 19/14 22/4 24/4 26/1 27/1 28/12 28/20 29/4 31/21 37/3 39/3 39/7 39/17 40/24 41/2 41/9 42/22 43/1 45/1 45/17 46/6 46/7 46/13 46/18 47/14 47/18 47/20 49/14 49/19 50/16 50/20 50/24 51/7 51/19 51/23 55/21 58/2 59/4 68/4 68/8 84/5 84/12 85/19 86/19 87/2 89/6 89/7 91/6 92/20 92/24 93/5 93/8 93/18 93/20 94/4 94/20 95/8 95/25 96/1 96/20 96/24 101/20 103/19 104/20 105/17 105/18 105/19 106/22 107/25 111/4 111/5 124/14 140/8
Medina's [27] 7/10 22/19 29/18 43/17 43/19 44/22 48/8 57/4 68/5 104/2 105/3 108/7 108/23 124/24 129/1 129/6 129/17 133/14 134/2 134/13 135/6 135/18 135/21 135/22 136/2 137/15 138/20
meeting [1] 7/6
memo [1] 7/7
memorialize [1] 102/7
memorized [1] 6/16
memos [1] 7/7
mentioned [2] 39/7 84/10
mesh [1] 9/8
met [1] 70/11
mic [1] 10/10
Michigan [2] 69/12 69/23
middle [2] 30/1 71/24
might [7] 5/1 33/21 58/4 58/4 58/12 60/8 81/6
mind [3] 45/18 125/11 140/6
mine [1] 14/2
minus [2] 55/8 55/9
minute [4] 10/14 30/11 30/18 67/25
minutes [8] 24/16 47/4 48/15 58/4 68/1 101/24 102/1 102/25
miss [1] 40/21
missed [1] 6/24
misspoke [1] 13/16
Mm [24] 56/24 59/20 61/6 61/10 62/7 65/11 66/15 68/13 69/22 76/25 88/5 89/23 95/15 104/23 107/9 108/20 112/4 113/21 114/6 115/6 127/4 127/24 132/19 134/7
Mm-hmm [24] 56/24 59/20 61/6 61/10 62/7 65/11 66/15 68/13 69/22 76/25 88/5 89/23 95/15 104/23 107/9 108/20 112/4 113/21 114/6 115/6 127/4 127/24 132/19 134/7
moment [28] 35/15 36/1 40/13 45/4 45/10 48/22 49/6 51/9 52/9 54/3 61/2 63/1 67/24 69/13 84/20 109/1 110/20 111/5 115/7 118/21 121/3 134/23 135/2 135/21 137/4 142/14 142/15 142/22
Monday [2] 20/2 32/11
money [9] 53/25 54/22 78/10 78/19 79/12 79/19 89/11 109/20 142/9
month [5] 62/20 62/25 63/21 64/7 74/9
months [15] 7/4 62/25 63/22 63/23 64/11 64/12 74/9 98/2 98/5 98/6 98/20 110/2 110/15 110/16 142/12
more [10] 6/11 10/3 67/22 100/8 105/25 108/13 111/14 115/24 116/24 140/21
morning [11] 2/7 2/10 2/11 2/12 2/16 2/17 2/18 2/22 4/4 8/11 25/9
most [6] 24/10 24/10 38/23 71/22 83/13 86/11
motion [44] 2/24 4/9 4/10 4/12 4/14 5/23 6/10 6/10 6/23 7/13 7/20 9/18 9/24 10/25 11/14 11/16 11/24 12/24 13/21 15/6 15/22 15/22 15/23 16/3 17/24 18/17 21/9 22/8 22/25 23/23 24/2 25/7 25/9 26/6 27/23 28/11 28/19 29/13 29/17 32/2 32/14 42/15 42/16 42/17
motions [4] 5/22 10/16 10/18 11/17
motivated [1] 83/14
move [19] 21/16 22/4 26/4 27/21 30/8 40/16 62/4 64/19 75/17 76/9 93/24 97/1 107/21 109/17 110/20 123/8 123/8 130/16 131/21
moved [1] 38/22
moves [1] 8/24
moving [9] 9/17 14/24 15/2 21/12 34/11 34/14 36/23 37/3 142/4
Mr [115] 2/7 2/10 2/24 7/12 7/12 7/20 10/21 11/9 12/10 12/15 15/7 15/9 19/25 22/10 22/11 22/18 22/18 23/10 23/14 25/6 25/23 25/25 27/1 27/20 28/6 28/11 28/12 28/13 28/17 28/20 29/1 29/2 29/3 29/13 30/7 31/20 37/3 37/10 42/19 45/20 46/15 59/4 60/19 61/5 63/12 64/17 65/16 68/14 68/24 69/2 73/25 74/14 74/15 75/2 75/2 75/20 77/15 78/1 78/2 78/12 78/13 79/14 79/22 80/6 80/12 81/12 82/11 84/24 87/5 88/20 89/5 89/21 91/23 91/25 95/12 97/8 98/24 99/2 101/12 101/17 101/20 109/20 109/20 110/2 110/2 110/11 111/18 111/19 112/10 112/10 113/1 113/11 117/2 117/19 117/24 125/22 126/3 126/8 129/20 130/11 131/13 133/5 135/3 135/13 136/9 140/2 140/8 140/23 142/6 142/9 142/10 142/13 142/13 143/2 144/1
Mr. [72] 2/18 2/19 4/2 4/7 4/10 10/6 10/19 11/2 11/20 13/19 13/22 14/12 19/9 19/19 19/20 19/21 20/15 21/10 21/18 21/23 22/2 22/12 22/17 22/25 23/16 23/19 25/3 26/3 26/18 27/24 28/6 28/6 28/12 28/17 29/1 29/1 29/2 29/6 29/14 30/5 31/6 32/3 33/20 35/10 36/5 37/2 37/8 37/23 38/8 39/5 54/10 55/5 67/24 67/25 68/3 72/12 73/14 78/4 81/4 81/25 82/20 96/21 103/15 103/16 104/16 105/20 110/1 110/24 112/1 114/3 123/9 136/15
Mr. Ball [1] 19/19
Mr. Ball's [1] 13/22
Mr. Benedict [10] 2/18 10/6 19/20 19/21 21/23 23/16 28/6 28/12 29/1 29/2
Mr. Bursey [4] 29/14 54/10 112/1 136/15
Mr. Childs [51] 4/2 4/7 4/10 10/19 11/2 11/20 13/19 14/12 20/15 21/10 21/18 22/2 22/12 22/17 22/25 23/19 25/3 26/3 26/18 27/24 28/6 28/17 29/1 29/6 30/5 31/6 32/3 33/20 35/10 36/5 37/2 37/8 38/8 39/5 67/24 67/25 68/3 72/12 73/14 78/4 81/4 81/25 82/20 96/21 103/15 104/16 105/20 110/1 110/24 114/3 123/9
Mr. Dattala [3] 37/23 55/5 103/16
Mr. Segal [2] 2/19 19/9
Ms [38] 22/19 27/1 28/12 29/4 37/3 39/17 58/2 68/4 68/5 81/2 89/6 96/24 101/20 105/3 105/17 105/19 111/4 111/5 116/9 116/10 116/18 118/5 118/7 121/6 122/20 126/8 127/2 127/6 128/21 129/6 129/17 133/14 134/2 135/6 138/16 138/20 138/23 140/8
Ms. [5] 10/22 26/1 31/21 93/20 105/18
Ms. Medina [5] 10/22 26/1 31/21 93/20 105/18
much [9] 6/11 8/6 61/6 89/1 89/2 101/8 133/5 133/8 134/21
must [2] 13/25 105/10
my [61] 2/6 5/19 5/23 6/3 6/10 8/6 8/8 8/9 11/23 14/1 14/11 15/6 15/22 16/13 16/13 16/21 17/24 17/24 18/10 18/13 18/17 18/23 19/2 19/13 19/13 19/15 19/17 20/12 23/20 24/2 24/11 24/14 24/23 26/9 26/9 26/21 29/19 31/13 32/10 33/24 34/25 36/18 37/18 43/23 46/20 52/23 59/5 67/18 97/15 98/17 99/11 101/25 116/8 121/16 125/11 125/15 137/25 140/6 141/12 143/9 144/11
myself [3] 34/6 83/8 110/23

N

name [4] 38/5 44/19 44/20 105/8
narrowed [1] 11/23
NAT'L [1] 1/18
National [1] 2/9
native [1] 119/10
nature [1] 47/20
necessarily [1] 3/18
necessary [4] 24/24 25/15 25/16 124/9
need [74] 3/16 5/9 7/17 7/23 7/24 12/8 14/9 19/3 19/12 27/16 30/10 31/3 31/23 32/13 32/20 39/11 40/18 43/11 53/21 55/23 56/2 56/7 56/14 56/22 57/3 57/3 57/4 60/7 60/11 61/17 62/15 65/18 65/25 66/6 69/6 73/6 84/1 85/3 90/23 91/2 93/24 93/25 99/16 99/25 100/8 102/4 102/4 104/13 105/25 107/5 107/7 107/11 107/18 111/10 113/19 114/23 115/20 117/23 118/4 123/17 123/20 128/13 130/2 130/5 130/6 130/12 134/9 136/19 136/25 137/1 138/6 139/7 139/9 139/10
needed [4] 75/16 76/8 80/3 124/22

N

needs [2] 3/18 130/8
negligence [7] 46/23 46/24 47/25 48/8 66/14 66/18 93/16
NEVADA [24] 1/2 2/1 30/14 30/14 70/14 70/16 70/23 70/25 71/17 80/16 85/20 117/17 118/17 118/22 118/23 118/24 118/25 119/1 119/1 120/21 123/2 127/2 136/4 138/17
never [8] 7/1 7/20 29/14 82/3 82/12 91/19 91/20 117/19
new [8] 19/7 66/25 72/9 111/10 116/7 128/4 137/1 137/18
news [1] 66/9
next [16] 16/7 60/25 110/24 111/3 112/14 114/17 116/6 116/7 116/12 124/8 125/24 127/16 129/23 131/23 136/21 136/22
nice [3] 28/7 34/20 36/4
nine [1] 17/8
no [122] 1/5 1/6 3/1 3/2 4/16 7/18 7/18 7/24 8/11 8/11 11/1 11/15 14/16 14/16 15/25 18/4 18/6 18/6 18/6 25/6 26/2 31/15 33/11 34/8 36/17 38/21 38/25 39/25 40/16 50/12 50/12 55/18 57/21 58/13 58/15 60/1 60/4 64/20 66/16 67/7 67/9 68/10 68/10 68/14 71/13 71/21 72/17 73/16 74/5 74/14 77/2 81/13 83/4 83/4 86/5 90/5 91/3 98/3 100/1 100/10 105/2 105/18 105/18 106/8 106/19 107/6 107/7 108/3 108/3 110/2 110/24 111/12 111/13 113/10 114/12 114/21 115/12 116/3 118/2 119/8 119/8 119/8 120/9 120/9 122/7 122/7 122/7 123/20 123/25 124/5 124/9 125/13 128/2 128/7 128/15 131/5 132/1 132/4 132/4 132/13 133/1 133/2 133/8 133/24 134/1 134/3 134/4 134/16 134/24 135/8 135/17 135/19 135/21 136/20 136/21 140/11 140/14 140/16 140/23 140/23 140/23 141/11
non [1] 7/10
none [1] 87/5
nonparticipation [1] 8/3
Nope [3] 60/13 129/15 138/11
nor [1] 22/8
not [119] 3/9 3/9 4/7 4/8 4/18 6/3 6/5 6/16 7/1 7/8 7/11 8/8 9/7 9/11 10/2 11/2 11/5 11/5 11/11 12/19 13/1 13/22 14/1 14/6 14/9 15/14 16/3 16/14 19/16 20/8 20/11 20/20 21/4 21/6 22/3 24/6 24/9 24/10 24/19 24/22 25/1 25/6 25/9 25/10 27/2 29/21 30/15 31/3 31/23 32/20 32/21 33/13 34/5 37/23 38/17 40/14 41/12 42/1 44/23 47/6 51/5 52/11 58/14 58/23 71/7 71/24 71/25 72/25 73/22 75/9 78/16 78/25 81/8 81/13 81/21 82/3 82/12 83/4 83/15 84/22 84/25 85/11 86/23 87/7 87/8 89/5 99/4 99/22 102/13 107/8 110/4 110/13 110/13 111/22 112/9 113/9 116/15 116/20 117/19 118/2 119/5 121/15 122/12 124/4 124/9 125/9 126/12 128/22 130/8 130/12 131/11 133/15 133/23 134/4 134/5 134/18 136/21 136/23 137/25
notarial [4] 44/5 44/16 47/22 66/20
notarized [9] 44/21 80/4 81/9 120/13 120/14 121/12 123/5 127/10 138/25
notarizing [5] 41/9 47/15 49/21 84/12 95/16
notary [45] 41/16 41/18 41/23 42/6 43/18 43/21 43/23 44/10 44/16 44/22 45/2 47/9 47/11 49/15 49/16 49/24 51/6 56/24 56/25 57/2 57/4 57/5 60/6 60/20 60/21 61/4 80/16 81/2 85/19 85/21 86/20 87/8 94/20 94/21 95/5 95/19 104/2 104/17 105/3 108/1 108/7 108/23 117/17 124/24 126/1
notary's [1] 104/24
notated [1] 141/4
note [9] 42/7 51/10 73/22 73/23 74/3 81/16 83/25 85/11 139/16
noted [1] 39/7
notes [7] 15/22 109/25 114/2 137/5 137/25 141/12 141/13
notice [10] 4/8 5/16 6/4 6/8 6/15 25/7 83/18 84/1 105/9 123/13
November [10] 4/19 4/22 16/5 18/5 18/7 22/21 25/2 25/19 27/23 32/5
now [78] 8/1 10/24 11/14 13/20 13/24 16/5 17/21 18/6 19/5 25/3 25/5 30/24 31/24 32/19 33/8 33/21 36/8 36/19 36/23 37/2 37/3 40/2 40/7 44/1 45/3 45/18 51/12 55/23 55/25 56/5 58/14 58/15 58/21 63/8 65/5 65/19 65/20 66/8 68/24 69/11 69/22 69/25 72/21 73/2 81/18 81/20 84/21 85/10 103/5 104/16 105/15 106/18 107/10 107/21 108/24 109/4 109/5 109/17 109/25 110/1 111/24 113/24 114/1 116/6 116/7 116/13 122/13 123/10 124/19 125/24 125/25 128/1 129/23 136/25 137/4 138/23 139/2 142/4
NRCP [1] 23/1
NRS [17] 44/4 44/5 45/1 47/5 47/16 48/1 48/2 48/10 49/22 50/2 50/2 50/19 50/23 51/20 95/17 96/7 99/17
number [49] 2/9 2/13 52/24 57/4 66/14 66/16 66/17 66/23 70/18 70/20 71/1 85/18 103/20 103/20 104/1 104/1 104/3 104/15 104/16 104/22 105/1 105/2 105/3 105/4 105/13 105/15 106/16 106/18 106/20 106/21 108/2 109/5 109/11 109/11 109/17 109/19 109/23 109/25 110/1 112/20 113/8 113/13 113/17 114/13 114/15 127/17 127/19 130/16 140/14
Number 1 [1] 70/18
Number 11 [1] 127/17
numbered [1] 140/17
numbers [4] 24/23 26/19 100/25 130/13
numerous [2] 41/6 84/8

O

oath [1] 117/24
object [6] 12/18 16/16 16/18 16/20 16/24 25/24
objected [1] 16/16
objecting [1] 22/3
objection [1] 26/2
objective [3] 46/14 91/8 93/6
obtain [4] 18/11 18/18 82/7 87/20
obviously [2] 34/25 121/15
occur [1] 32/15
occurred [1] 140/8
OCTOBER [12] 1/12 2/1 71/18 88/12 117/3 117/4 122/23 129/8 129/9 129/18 129/24 133/14
off [7] 14/12 73/2 107/20 125/11 125/16 125/20 144/6
offered [2] 51/7 103/21
offering [1] 127/21
office [5] 24/17 44/10 44/15 70/19 71/2
officer [2] 10/12 11/8
oh [30] 3/4 3/16 15/13 17/5 25/4 28/24 32/25 34/5 44/13 53/6 78/6 86/5 94/3 106/8 110/24 112/3 112/8 115/14 115/20 126/8 126/16 128/11 129/25 131/5 132/14 133/1 135/1 135/20 135/24 141/17
okay [401]
Olsen [1] 144/14
on [259]
once [7] 13/1 15/4 26/21 75/10 79/9 86/7 123/20
one [100] 3/11 3/11 3/16 5/16 9/11 9/11 9/25 11/1 11/23 12/14 12/16 14/23 16/9 16/10 17/11 17/25 22/22 39/10 40/13 45/4 47/9 49/8 49/20 50/17 50/21 51/9 54/3 55/17 56/14 60/2 60/8 60/9 60/17 61/1 61/2 61/20 61/25 62/1 62/2 67/24 69/13 77/13 82/4 82/13 84/1 84/14 85/5 85/11 87/17 91/16 94/12 95/13 96/25 98/9 98/9 99/20 102/18 105/25 106/12 107/1 107/11 108/5 109/6 109/6 110/20 111/3 111/5 113/25 114/13 114/17 115/7 116/6 116/6 116/9 117/20 118/8 118/21 123/25 124/9 125/24 126/1 126/7 126/21 131/23 133/8 134/23 135/2 135/5 135/9 135/22 137/1 137/14 137/24 137/25 139/19 140/21 142/18 142/21 142/22 142/22
one's [1] 113/24
ones [3] 67/13 68/20 81/18
only [11] 5/21 19/24 21/19 22/23 24/11 88/16 101/21 122/6 123/20 137/14 137/19
oOo [1] 144/8
open [1] 116/20
opening [1] 8/23
operating [1] 113/1
opportunity [2] 19/25 31/25
oppose [2] 26/9 26/21
opposed [6] 23/21 24/6 25/7 25/13 25/18 26/7
opposition [2] 19/19 42/20
or [78] 3/8 4/4 5/12 8/7 12/17 15/19 16/17 18/5 22/4 22/14 22/20 22/22 23/22 25/4 34/5 37/12 39/21 40/3 40/4 44/8 44/10 44/15 44/23 44/24 45/1 46/18 47/21 47/21 49/23 49/23 50/3 50/4 52/17 55/16 56/7 58/2 58/14 60/19 64/20 65/21 68/8 69/25 70/9 72/8 73/11 73/18 79/12 81/1 83/15 87/13 89/19 90/5 92/5 92/8 93/7 95/18 95/18 96/24 101/24 102/8 103/10 103/23 104/17 105/8 107/15 108/1 111/2 111/10 112/5 112/6 114/7 122/16 127/25 128/25 135/6 136/1 137/14 138/7
oral [1] 22/13
order [33] 3/22 4/3 4/14 4/20 6/6 8/1 10/17 11/12 13/3 15/24 16/4 20/1 24/2 25/6 25/25 27/25 28/1 31/14 32/1 49/23 50/3 71/18 95/18 102/4 109/14 129/24 138/5 138/6 140/13 140/14 140/17 141/4 143/7
orderly [1] 38/23
orders [6] 3/17 3/20 5/22 11/15 19/1 143/9
organize [1] 58/9
organized [2] 69/4 106/4
original [5] 11/24 68/25 81/11 81/16 116/8
originates [1] 111/6
other [31] 6/25 9/8 9/15 14/6 14/7 14/25 22/22 27/3 34/7 34/16 37/1 37/9 48/3 49/8 49/20 50/17 50/21 [illegible] 71/13 73/1 90/5 90/12 94/12 95/13 103/17 105/19 120/15

O

other... [3] 126/1 140/5 143/4
others [2] 9/11 59/19
otherwise [3] 32/9 44/9 44/18
our [15] 7/7 8/22 9/1 9/2 20/19 20/19 20/20 21/6 23/17 38/20 53/7 68/25 72/20 119/24 127/5
ours [1] 27/22
out [21] 10/20 12/7 12/22 13/9 14/1 15/7 19/18 21/10 22/23 24/17 26/3 26/9 26/21 43/10 56/2 59/5 68/8 79/20 79/20 114/4 126/19
outside [1] 9/21
outstanding [1] 9/21
over [10] 16/11 19/7 52/19 102/20 103/16 110/2 110/15 110/16 113/10 142/12
overlap [1] 111/5
overlapping [1] 69/5
own [9] 36/18 41/23 53/18 53/24 57/3 86/20 102/15 140/8 140/9
owned [1] 70/12
owner's [1] 19/6
ownership [2] 88/7 90/5

P

p.m [8] 31/18 31/18 32/13 68/2 68/2 103/14 103/14 144/7
page [85] 13/24 15/6 18/19 38/24 39/11 39/13 39/14 39/23 40/12 40/23 45/6 45/11 48/21 48/23 51/12 51/15 51/18 52/8 52/13 56/19 61/20 61/21 61/21 64/21 64/22 65/5 66/14 66/17 67/3 67/4 69/17 69/25 70/5 70/18 71/2 77/14 82/4 82/13 84/18 84/19 85/9 85/12 85/15 86/1 86/3 86/6 88/24 91/17 91/18 92/13 93/16 93/23 93/24 93/25 94/6 108/9 108/11 109/1 111/7 115/20 117/20 117/25 118/11 118/13 120/16 121/8 121/11 121/18 121/19 121/21 121/22 121/24 122/1 122/3 122/6 122/10 122/14 123/23 123/23 123/25 124/23 125/1 125/2 125/5 129/2
page 10 [1] 121/8
pages [8] 66/12 87/17 104/13 116/25 117/9 118/4 121/17 124/10
paid [15] 62/6 62/14 62/20 62/25 63/21 63/22 78/9 91/19 97/15 98/2 109/18 109/20 110/2 110/15 142/12
paper [2] 105/25 121/3
paragraph [148]
paragraphs [13] 39/7 39/24 43/19 46/1 50/1 50/25 51/8 59/23 95/20 96/19 96/19 96/21 96/25
parameters [1] 22/6
Parcel [1] 70/19
parcels [2] 70/7 70/12
Pardon [2] 32/23 124/12
parenthesis [1] 75/18
part [18] 47/11 62/9 64/10 74/19 75/3 75/24 88/1 98/4 99/8 110/4 110/18 111/25 121/4 121/7 130/9 141/21 141/24 141/25
parte [1] 4/20
participate [2] 7/5 33/13
participated [1] 7/1
participating [2] 7/1 15/14
parties [6] 1/10 9/3 22/1 23/3 29/22 37/9
parts [3] 14/24 15/2 34/11
party [1] 38/16
party's [2] 13/8 21/21
past [2] 21/16 100/6
paste [1] 102/11
pay [6] 72/7 73/10 73/18 74/9 74/24 79/10
paying [1] 63/24
payment [5] 74/10 74/14 79/12 79/13 88/16
payments [7] 79/21 83/22 89/12 98/4 110/9 110/18 110/25
penalties [1] 110/5
penalty [6] 43/20 43/20 51/2 60/6 89/18 110/19
pendens [1] 42/17
pending [2] 11/14 27/22
people [1] 34/21
per [7] 46/23 46/24 47/25 66/14 66/18 74/9 93/16
percent [7] 64/5 76/20 77/6 114/20 115/8 115/8 115/21
peremptory [1] 12/13
perfect [4] 23/6 38/13 102/21 128/3
perfectly [3] 19/4 23/8 55/20
performed [2] 44/17 44/17
performing [3] 40/5 43/23 47/22
perhaps [9] 5/1 5/3 6/17 21/25 22/16 36/20 83/15 86/11 97/4
period [2] 44/7 72/9
perjury [9] 43/21 49/13 49/25 50/24 51/2 60/6 89/18 94/18 95/20
Perry [1] 103/1
person [7] 9/11 34/20 34/21 44/20 47/11 83/14 122/12
personal [1] 15/19
personality [1] 14/11
personally [1] 25/15
persons [2] 48/1 48/4
pertain [1] 68/5
phase [1] 37/4
phonetic [3] 65/21 80/16 103/1
pick [1] 43/10
picture [1] 40/25
piece [1] 121/3
pieces [1] 34/14
place [3] 105/7 105/12 108/18
placing [3] 49/12 94/17 109/12
plaintiff [29] 1/5 2/4 2/5 8/24 9/11 30/4 46/14 46/15 46/17 46/18 48/11 48/17 49/10 52/4 52/18 53/10 53/20 53/24 88/16 91/8 91/20 91/20 92/5 92/8 92/9 93/6 93/7 93/8 94/14
plaintiff's [6] 8/20 8/22 8/24 9/5 49/11 94/16
plaintiffs [1] 51/23
plan [2] 30/25 68/25
planned [1] 74/24
Plat [2] 70/18 71/2
pleadings [1] 35/21
please [27] 2/4 10/10 29/11 32/18 38/4 38/8 39/11 56/8 61/17 81/5 98/12 102/1 104/19 105/7 105/12 106/2 113/17 114/14 117/11 122/24 129/25 131/9 138/12 139/15 140/13 140/19 143/7
pleasure [1] 26/2
plus [2] 29/18 103/5
podium [1] 33/22
point [5] 10/17 12/10 23/9 29/19 105/10
pointing [2] 15/7 19/21
points [5] 8/16 11/23 20/16 20/17 21/10
portion [2] 98/18 106/22
positive [1] 106/5
possible [4] 22/24 100/14 104/6 143/12
Post [8] 68/20 [illegible] 105/7 105/13 106/1 108/18 108/19 109/14
Post-it [5] 68/20 105/7 105/13 106/1 108/18
Post-its [3] 86/3 108/19 109/14
practical [3] 3/25 12/12 12/14
practically [1] 11/18
practice [1] 32/14
practiced [1] 36/12
practicing [1] 20/25
preceding [1] 105/13
PRECISION [36] 1/21 2/13 9/16 12/17 13/5 13/10 18/25 19/18 19/20 19/21 21/12 22/7 22/22 27/10 90/1 90/6 90/12 90/16 130/24 131/13 132/13 132/21 134/15 134/25 135/3 135/13 136/9 136/15 136/19 137/12 137/24 139/3 139/9 139/18 139/21 139/22
Precision's [3] 8/20 9/9 23/18
preferably [1] 22/21
prejudice [1] 12/24
prejudicial [2] 9/4 9/12
preparation [2] 11/4 36/4
Prepare [1] 102/6
prepared [2] 3/16 13/7
preparing [1] 11/5
present [3] 2/6 65/6 102/2
presented [8] 72/4 73/4 76/17 77/16 78/18 79/1 112/10 113/1
pretrial [3] 6/19 7/6 7/7
pretty [3] 3/15 8/6 61/6
prevail [1] 19/3
previous [2] 45/25 71/18
previously [1] 47/2
price [1] 79/11
principal [16] 2/14 54/9 54/13 55/5 55/7 62/16 89/12 97/13 97/14 97/15 98/4 99/4 110/16 111/1 142/12 142/16
print [1] 126/19
printout [10] 76/19 76/24 79/3 114/19 114/24 115/2 115/5 115/25 116/1 132/2
prior [2] 79/18 79/25
probable [2] 51/21 51/22
probably [7] 9/12 12/3 13/16 35/24 39/2 61/7 101/8
problem [2] 26/13 31/15
proceed [3] 6/2 33/7 38/8
proceeding [2] 29/15 91/4
proceedings [3] 1/8 [illegible] 144/7 144/10
process [3] 6/11 8/2 11/10
produced [2] 41/17 85/20
progress [2] 11/9 11/10
progressing [1] 9/16
promissory [4] 73/22 73/23 74/3 114/2
pronunciation [1] 119/8
proof [1] 93/11
proper [2] 83/6 83/7
properly [1] 138/13
properties [16] 13/2 21/11 53/25 70/13 71/14 72/3 79/20 79/20 87/14 88/3 89/11 91/22 126/5 130/14 137/19 140/7
property [68] 9/19 13/23 26/6 46/8 46/9 54/23 61/25 63/15 70/12 70/15 70/24 71/5 72/6 72/11 73/9 73/13 73/21 74/4 74/8 74/23 74/24 75/9 75/10 75/16 76/4 76/8 76/14 76/17 77/20 78/9 78/17 78/25 79/11 80/2 80/3 82/8 82/19 83/21 84/10 84/10 87/15 87/20 87/21 88/4 88/8 88/16 89/17 89/17 89/25 90/4 90/15 91/12 92/4 92/7 93/1 93/1 109/3 127/6 128/18 129/19 130/1 130/23 131/24 135/4 136/10 137/9 142/10 142/11
proposed [5] 7/14 7/19 7/22 11/1 12/15
prosecute [2] 50/8 50/14
prosecutor [1] 100/6
protect [2] 48/2 48/3
prove [29] 1/13 8/4 8/25 22/20 24/7 24/25 25/19 26/1 26/17 27/21 29/17 30/8 31/22 33/6 37/4 37/12 37/18 39/4 39/17 48/13 48/14 67/1 69/3 74/1 96/20 96/24 96/24 97/25 103/18
prove-up [25] 1/13 8/4 8/25 22/20 24/7 26/1 26/17 27/21 29/17 30/8 31/22 33/6 37/4 39/4 39/17 48/13 48/14 67/1 69/3 74/1 96/20 96/24 96/24 97/25 103/18
prove-ups [1] 37/18
proved [2] 65/12 65/14
proven [1] 48/12
provide [1] 143/7
provided [10] 41/23 41/24 44/9 44/18 57/2 57/14 57/14 66/4 86/19

P

provided... [1] 86/21
proving [1] 92/10
provisions [1] 15/17
public [14] 41/16 43/21 43/23 44/10 44/16 49/12 49/15 60/6 80/16 81/2 85/19 94/18 94/20 117/17
publish [2] 122/16 122/17
pull [4] 55/23 55/24 56/2 68/14
punch [5] 17/4 17/6 17/20 18/21 61/1
punitive [2] 99/17 99/23
purchase [44] 61/19 61/22 72/5 72/6 72/7 72/17 72/24 73/4 73/8 73/9 73/20 76/16 77/8 77/19 78/8 78/17 78/25 79/11 83/18 83/21 84/2 89/8 109/4 109/5 109/9 109/11 112/2 112/6 112/6 112/8 112/9 112/15 112/16 112/20 112/21 112/23 113/2 113/4 113/9 113/13 113/25 114/8 116/2 123/13
purchaser [1] 19/11
purchasers [3] 15/5 15/18 15/20
purport [1] 43/18
purported [6] 41/19 76/16 78/8 78/18 83/21 85/22
purportedly [9] 41/22 41/22 78/9 83/18 86/19 90/3 90/18 130/25 137/13
purporting [1] 84/8
purpose [5] 11/19 12/20 46/14 91/8 93/6
purposes [4] 3/25 91/2 103/17 104/3
pursuant [9] 28/11 30/3 31/19 49/23 50/4 65/19 66/5 66/6 95/18
pushed [1] 11/19
put [14] 3/17 3/17 10/14 11/3 30/1 47/3 68/22 71/16 102/7 105/25 106/1 120/18 136/6 138/6
puts [1] 103/22
putting [1] 138/4

Q

Quarter [1] 103/2
query [1] 8/10
question [5] 51/1 63/8 80/19 140/21 140/24
questions [5] 13/12 20/6 53/3 142/2 143/4
quick [65] 17/23 18/17 51/15 57/1 59/3 82/6 82/7 87/14 87/15 87/19 87/21 87/24 88/3 88/15 89/20 89/22 102/22 107/13 109/3 117/22 118/1 118/10 118/17 118/22 118/23 121/14 121/15 121/25 123/2 126/5 126/7 126/11 126/15 126/25 127/1 127/21 127/22 128/6 128/9 128/13 128/18 128/24 129/18 130/1 131/3 131/12 132/25 133/1 133/12 133/15 133/23 134/3 134/8 135/5 135/8 135/11 135/25 136/1 136/3 136/3 136/5 137/21 138/17 138/19 138/21
quick-claim [57] 59/3 82/6 82/7 87/14 87/15 87/19 87/21 87/24 88/3 88/15 89/20 89/22 107/13 109/3 117/22 118/1 118/17 118/22 118/23 121/14 121/15 121/25 123/2 126/5 126/7 126/11 126/15 126/25 127/1 127/21 127/22 128/6 128/9 128/13 128/18 128/24 129/18 130/1 131/3 131/12 133/1 133/12 133/15 133/23 134/3 134/8 135/5 135/8 135/11 136/1 136/3 136/3 136/5 137/21 138/17 138/19 138/21
quicker [1] 102/3
quickly [4] 21/24 47/8 130/7 130/10
quiet [1] 19/7
quotation [2] 75/18 75/19
quote [6] 17/24 43/24 73/11 73/11 76/10 76/11
quoted [1] 18/16
quotes [1] 43/20
quoting [1] 18/10

R

R-I-C-O [2] 96/19 142/18
raise [2] 37/24 72/2
raised [1] 10/20
rate [1] 64/4
RAY [1] 1/24
read [16] 4/9 30/22 30/23 44/2 44/12 47/6 51/11 54/20 70/8 78/5 96/6 96/8 96/14 96/15 96/21 96/25
reading [6] 15/6 17/24 22/12 54/4 54/18 71/9
reads [1] 8/23
ready [4] 13/6 25/17 32/13 33/7
real [13] 48/22 49/11 49/16 49/21 70/7 70/12 71/23 83/9 94/16 94/21 95/16 102/22 118/9
reality [1] 4/13
realize [2] 2/25 4/1
realized [1] 2/23
reallegation [7] 45/25 47/1 49/3 66/19 92/16 94/8 111/8
really [14] 7/23 8/25 10/15 10/15 11/21 20/6 23/17 30/23 75/10 86/11 124/17 130/6 138/1 141/13
reason [1] 15/9
reasonable [5] 9/17 10/1 65/18 99/8 102/14
reasons [1] 28/18
receive [5] 63/20 73/25 74/3 83/22 102/8
received [17] 3/9 3/10 5/15 53/19 53/24 54/15 55/5 74/25 75/11 79/21 88/16 89/1 89/9 89/11 89/15 90/11 91/21
receives [1] 79/9
receiving [1] 97/9
recess [2] 30/20 141/3
recessed [3] 31/18 68/2 103/14
recitation [1] 44/1
recites [1] 47/7
reconsideration [12] 4/10 4/15 5/23 9/18 9/25 11/14 13/21 16/3 21/10 26/6 27/23 32/3
reconveyance [12] 18/18 82/15 82/16 82/22 82/23 119/23 120/2 120/3 123/4 127/3 127/10 138/24
record [46] 2/3 18/18 36/22 37/8 37/11 38/5 38/20 44/2 47/4 47/7 49/12 53/7 53/23 57/16 65/13 66/4 66/21 66/23 66/24 69/6 70/8 71/16 80/8 81/22 82/7 82/8 82/16 83/6 83/11 88/9 89/3 90/5 94/18 96/11 96/14 96/15 96/16 96/23 97/1 97/2 101/17 123/24 130/5 130/14 141/2 144/6
recorded [33] 1/24 18/17 72/10 73/12 81/8 87/14 87/16 87/19 87/22 89/19 90/2 90/17 118/17 119/14 120/5 120/6 120/19 120/21 123/5 126/4 126/8 126/12 127/10 127/23 128/9 130/17 130/25 131/24 137/10 137/13 138/25 139/24 140/1
RECORDER [1] 1/24
Recorder's [2] 70/8 71/2
recording [3] 49/13 94/19 131/15
recover [1] 65/3
reduce [1] 142/11
reduction [1] 99/4
reemphasize [1] 8/17
refer [1] 39/24
reference [2] 122/13 122/25
referred [3] 70/12 70/15 70/23
referring [5] 38/9 69/7 88/23 117/12 121/12
regarding [3] 23/17 88/7 91/12
regards [1] 74/7
regulation [3] 49/23 50/3 95/18
regurgitates [1] 21/10
related [4] 1/10 8/19 21/11 21/16
relationship [2] 40/5 71/13
release [2] 32/24 33/3
relevant [1] 88/3
relief [2] 91/11 141/15
remaining [3] 8/20 19/17 21/20
remanded [1] 19/5
remember [7] 17/7 77/20 77/24 80/17 80/20 80/21 124/20
remove [1] 82/17
rent [2] 79/20 79/20
repeat [1] 98/12
repeating [1] 47/3
report [2] 44/8 141/8
REPORTING [1] 1/25
represent [4] 19/21 22/7 22/9 115/17
representation [2] 76/6 80/23
representations [14] 18/12 41/6 47/2 49/10 74/20 75/23 76/1 76/1 76/2 76/11 76/12 76/13 84/9 94/14
representatives [1] 15/19
represented [8] 6/5 7/3 29/18 41/17 75/15 80/13 85/20 117/15
represents [1] 19/24
request [4] 9/23 13/14 52/6 93/13
requested [1] 66/8
required [6] 28/20 48/18 52/5 72/7 73/10 73/19
requiring [1] 6/15
reset [1] 13/10
residence [1] 70/14
resident [5] 40/3 69/11 69/11 69/20 69/22
resolve [4] 13/5 19/17 20/7 27/20
resolved [9] 12/2 19/14 21/15 23/13 24/13 [illegible] 71/6 71/18 88/8
resolves [1] 8/6
resources [3] 12/7 13/8 21/14
respect [8] 29/3 30/4 33/13 37/3 100/20 105/17 111/24 134/14
respectful [1] 125/18
respectfully [1] 13/9
respondeat [1] 48/9
responded [1] 7/20
response [1] 22/8
responsibility [1] 14/2
rest [1] 87/2
restatement [1] 67/4
result [3] 48/8 51/22 92/9
retain [2] 48/18 52/5
retention [1] 44/7
review [1] 124/17
reviewed [2] 4/6 16/2
reviewing [3] 105/16 112/1 114/18
RICO [16] 49/1 49/3 50/5 50/6 67/3 94/4 96/12 96/13 96/18 99/11 99/17 99/19 99/23 100/3 142/18 142/23
rid [1] 104/7
right [213]
robe [1] 125/15
room [2] 12/12 14/21
rule [5] 6/16 12/23 30/13 30/15 30/16
rules [2] 7/11 25/24
ruling [2] 6/7 29/24

S

Sacramento [123] 17/23 18/13 18/19 41/7 46/8 46/9 53/13 53/16 61/11 62/2 62/2 63/14 70/13 70/15 70/16 70/22 70/23 70/24 70/24 72/6 72/11 73/9 73/13 73/21 74/4 74/8 74/23 75/9 75/16 76/3 76/8 76/14 76/17 77/20 78/9 78/17 78/25 79/11 80/3 82/8 82/19 83/21 84/9 87/15 87/20 87/21 88/4 88/4 88/15 89/10 89/10 89/17 89/17 89/25 90/4 90/15 92/4 92/7 92/25 93/1 109/3 109/6 109/10 109/12 112/6 112/7 112/11 112/21 112/24 113/4 113/8 114/5 114/10 114/14 115/12 115/22 116/1 126/6 126/6 126/9 127/7 127/8 127/11 127/12 127/15 128/18 128/22 129/19 130/21 130/23 131/24 132/3 132/18 133/13 133/16 133/19 134/12 [illegible] 134/16 134/17 134/20 135/5 135/25 136/1 136/12 136/16

S

Sacramento... [17] 136/19 136/23 137/8 137/9 137/11 137/14 137/15 137/21 137/22 137/23 138/17 138/20 138/25 139/4 139/8 142/10 142/10
said [7] 12/16 23/16 24/18 77/22 115/11 121/11 121/14
sale [27] 90/2 90/17 91/21 128/7 130/17 130/24 131/5 131/8 131/12 132/16 132/23 133/3 133/19 134/14 135/3 135/12 136/1 136/8 136/13 136/14 136/18 137/13 137/22 139/3 139/12 139/17 139/20
sales [2] 76/3 76/13
salient [1] 117/9
same [32] 8/2 12/8 14/6 28/23 33/16 38/17 38/24 56/19 57/6 60/8 60/9 60/15 60/17 65/15 67/17 67/17 67/21 67/21 67/22 68/8 68/12 79/6 80/17 99/21 106/4 107/1 107/3 114/21 115/13 115/13 117/17 129/8
sanction [2] 99/9 142/15
save [5] 5/1 5/3 5/6 12/24 12/24
saw [1] 12/1
say [15] 3/14 13/14 14/10 20/6 21/15 30/6 32/4 36/19 51/11 69/15 87/10 95/12 103/6 119/1 121/18
saying [3] 4/18 50/11 125/19
says [15] 11/10 41/11 48/7 59/21 73/3 105/9 106/2 106/6 114/4 115/11 117/13 121/11 121/14 129/25 134/25
schedule [10] 10/13 64/2 76/19 77/4 79/3 114/20 115/3 115/8 115/16 116/1
scheduling [1] 25/25
scheme [2] 41/3 84/6
school [1] 17/17
scope [4] 40/4 47/20 47/22 56/7
se [6] 46/23 46/24 47/25 66/14 66/18 93/16
sealed [1] 116/14
seals [3] 49/16 94/22 95/5
sec [2] 94/2 98/9
second [34] 18/10 18/14 24/22 24/24 28/24 35/22 36/1 38/10 39/10 45/13 52/1 56/22 57/13 61/20 62/2 69/7 69/20 70/6 71/1 72/14 83/13 91/11 91/18 98/9 106/3 109/6 111/25 113/24 116/9 118/8 135/22 136/14 137/3 139/19
Secondly [1] 10/18
section [1] 96/24
see [26] 4/1 4/9 4/14 15/1 24/9 32/1 34/20 36/18 45/3 49/7 64/19 65/25 67/5 90/24 95/9 107/10 107/22 108/14 115/1 122/12 126/18 132/8 140/4 141/12 141/24 142/19
seek [4] 6/6 6/8 6/9 6/10
seeking [1] 99/11
seeks [1] 90/22
seems [3] 6/2 20/7 21/25
seen [1] 34/21
sees [1] 10/22
Segal [3] 2/15 2/19 19/9
selection [1] 12/4
sell [5] 19/10 46/8 53/12 53/15 92/25
selling [2] 63/14 72/2
semi [1] 71/22
semi-literate [1] 71/22
send [1] 3/21
sense [3] 23/7 23/8 26/11
sent [4] 2/20 4/2 16/9 59/4
sentence [1] 72/9
separate [13] 8/21 9/6 9/24 12/25 21/8 27/12 43/5 58/3 67/12 105/10 108/3 108/5 137/17
separated [1] 10/2
separately [4] 38/16 45/22 45/24 121/11
September [4] 13/1 13/10 75/19 76/10
serve [1] 81/2
served [1] 13/8
service [4] 3/1 3/5 3/7 5/12
services [2] 32/20 52/5
set [10] 4/14 4/19 4/21 22/6 31/24 36/23 46/3 87/15 87/16 88/16
sets [1] 89/1
settle [2] 11/21 11/22
settlement [5] 9/16 9/22 10/1 21/13 21/18
seven [1] 6/8
seven-days [1] 6/8
seventh [5] 49/2 67/2 94/3 96/18 142/23
sever [1] 13/9
severance [2] 22/17 23/6
shall [3] 15/18 44/10 44/16
she [23] 24/4 40/3 40/3 41/17 41/22 42/23 43/2 43/20 51/2 51/3 51/5 60/5 60/19 62/12 81/9 85/20 85/20 106/12 106/23 121/11 121/14 121/18 121/18
she's [3] 6/5 41/16 42/9
short [1] 30/5
shortening [2] 4/14 20/1
shot [2] 21/15 29/11
should [18] 16/12 19/5 19/25 35/21 36/20 46/21 54/11 54/14 55/7 59/2 64/13 71/16 89/9 89/15 98/25 99/3 141/21 141/24
shouldn't [1] 116/21
show [24] 3/18 6/18 7/7 62/5 65/9 104/16 105/17 107/11 107/12 111/4 112/1 112/3 112/23 114/18 123/15 124/9 124/9 124/9 124/23 125/24 127/21 131/23 140/7 143/1
shown [2] 70/18 71/1
side [1] 12/12
sign [10] 41/12 49/15 80/12 80/24 84/22 84/25 94/21 102/9 117/14 143/12
signature [29] 18/19 41/4 42/24 43/3 44/19 44/20 44/20 44/23 45/2 47/10 49/11 49/24 59/5 60/20 61/4 82/4 82/13 83/18 84/7 87/7 87/17 94/16 95/19 106/13 106/24 108/1 117/20 120/7 120/16
signatures [6] 41/19 49/15 80/15 85/22 94/20 117/16
signed [18] 16/2 26/25 42/22 43/1 51/2 72/5 73/7 80/3 82/5 82/14 87/18 104/21 117/21 120/12 120/15 123/3 124/3 126/8
significant [3] 11/9 11/10 38/22
significantly [1] 11/21
signing [6] 17/23 42/1 42/9 86/23 88/15 109/2
Similarly [1] 10/24
simply [1] 7/9
since [2] 70/14 72/25
sit [2] 37/23 138/9
sitting [1] 12/11
situation [6] 14/6 22/16 23/3 28/8 38/22 100/16
situations [1] 14/7
Sixth [1] 94/2
skip [5] 45/3 71/9 87/3 93/21 93/25
Skipping [1] 48/20
slow [1] 53/21
slower [1] 44/12
so [304]
sold [1] 134/24
solved [1] 26/13
some [11] 10/14 18/7 22/5 22/5 26/19 56/2 68/8 68/11 69/4 124/20 124/21
somehow [1] 3/21
someone [4] 29/16 45/2 60/19 108/1
something [20] 4/5 4/12 5/13 16/10 21/24 24/14 24/14 25/3 33/7 65/22 65/22 65/25 77/1 104/17 104/24 106/18 108/25 111/10 112/2 116/20
sometimes [1] 17/8
somewhat [2] 27/12 89/7
soon [3] 21/17 22/20 143/12
sooner [2] 32/9 133/5
sorry [26] 5/2 6/13 17/2 17/5 19/20 20/13 23/10 28/15 35/4 39/21 64/10 70/3 73/3 78/10 93/23 96/12 103/4 110/3 115/20 128/11 131/11 133/6 134/5 134/23 137/25 142/25
sort [2] 52/13 59/24
sought [1] 72/1
sounds [3] 30/25 119/4 143/6
Spanish [1] 119/5
speak [2] 10/9 119/10
speaking [2] 11/18 34/6
specific [4] 20/6 30/15 47/9 108/13
specifically [3] 66/7 95/24 103/22
spell [1] 38/4
Spencer [19] 80/16 80/16 81/1 81/2 82/5 82/14 87/18 116/10 117/17 118/5 118/6 118/7 120/11 121/6 122/21 122/23 126/8 127/6 138/16
Spencer's [8] 81/7 82/24 117/2 117/21 127/2 128/15 128/21 138/23
spend [2] 133/5 134/11
splitting [1] 12/13
STACEY [1] 1/24
stack [4] 11/19 13/11 27/22 32/10
staff [1] 34/13
stamp [2] 49/16 94/22
stands [1] 70/19
start [9] 8/22 23/4 31/2 36/20 39/3 49/1 55/22 103/20 111/24
started [3] 10/15 13/4 39/13
starting [7] 2/4 39/16 74/9 118/15 122/10 134/6 138/1
starts [12] 32/10 52/13 66/14 70/5 91/17 91/17 92/13 93/16 94/6 94/7 114/4 121/20
state [16] 38/4 42/24 43/3 43/22 43/22 43/24 60/7 84/8 85/20 106/13 106/23 121/17 122/2 137/8 137/9 139/15
stated [3] 79/9 79/18 80/1
statements [4] 8/23 42/1 86/23 89/18
states [3] 44/5 73/21 121/16
stating [3] 42/23 43/2 106/22
statute [11] 15/6 44/2 47/3 47/12 48/4 51/3 51/6 60/11 99/12 100/5 107/25
statutes [3] 15/3 19/3 22/12
stay [5] 19/2 19/2 19/3 19/12 37/19
still [12] 9/20 11/11 16/16 21/1 21/20 26/5 37/10 60/10 62/9 69/5 69/7 117/24
stipulate [4] 11/1 14/23 26/16 29/2
stipulated [2] 27/24 28/4
stipulating [1] 8/9
stipulation [5] 11/1 27/20 28/5 28/25 29/22
storage [1] 44/7
straight [2] 55/4 64/20
Street [2] 70/15 70/24
stressing [1] 24/17
stricken [1] 8/3
strike [9] 6/17 7/9 22/18 22/19 23/22 23/22 51/21 69/25 97/17
strikes [1] 24/5
striking [1] 29/15
sub [13] 44/4 44/4 44/9 45/1 45/1 47/16 47/16 48/1 48/1 48/3 48/3 48/11 48/11
subject [9] 15/5 19/6 19/11 22/23 70/13 72/16 87/14 91/22 126/5
submit [2] 26/20 28/1
Subsection [3] 44/9 44/18 44/19
subsequent [1] 19/11
successors [1] 15/19
such [3] 15/20 100/25 101/10

S

suffer [3] 51/24 51/24 93/9
suffered [5] 46/18 51/23 52/18 92/9 93/8
sufficient [4] 4/8 116/24 116/25 122/5
suggest [3] 23/5 27/19 38/15
suggested [1] 21/25
suggestion [3] 19/14 23/4 25/22
summarizing [1] 52/17
summary [7] 5/22 10/16 11/12 15/11 15/23 18/25 22/8
superior [1] 48/9
supplement [1] 42/20
support [3] 41/23 57/3 86/20
supported [1] 43/18
supporting [2] 41/5 52/20
supposed [2] 18/1 20/19
supposedly [1] 18/4
Supreme [1] 66/9
sure [45] 5/11 10/11 15/21 27/25 30/10 30/11 30/20 31/10 31/13 35/9 35/17 37/7 40/14 40/17 44/13 53/22 55/16 55/19 61/3 62/8 62/10 64/7 64/14 68/19 81/15 81/17 82/1 83/7 83/11 84/15 87/5 94/24 97/21 100/8 101/6 103/12 106/1 113/20 117/12 122/19 122/24 134/10 138/10 138/12 143/10
swear [1] 37/15
sworn [2] 37/18 38/2

T

tab [7] 86/2 86/4 104/15 113/19 113/20 114/14 117/11
tabbed [1] 113/3
table [2] 88/17 88/23
take [34] 3/22 7/16 10/15 30/10 30/17 32/19 40/14 40/17 40/20 43/13 51/14 57/1 58/4 58/7 58/12 58/17 67/4 67/25 87/4 101/1 101/7 101/24 102/1 109/25 113/3 113/19 114/3 125/11 125/15 125/19 129/25 137/5 141/13 142/2
taken [5] 68/4 117/2 117/4 122/23 129/17
taking [3] 25/24 61/22 102/25
talk [7] 4/12 9/9 20/16 32/25 33/6 75/10 115/2
talked [3] 7/5 11/25 100/24
talking [9] 12/12 12/14 27/6 27/9 63/15 66/19 67/9 90/6 90/12
talks [6] 64/23 66/19 70/7 87/5 91/1 121/22
team [1] 14/8
technical [1] 29/7
technically [2] 4/8 4/9
tell [8] 3/16 11/8 13/25 102/13 105/8 118/11 122/13 133/11
terms [1] 10/21
testified [4] 38/3 64/18 74/16 118/7
testify [5] 24/8 24/23 27/17 63/3 121/25
testimony [7] 25/14 37/11 81/8 110/11 118/3 127/1 127/21
than [7] 5/16 6/11 27/3 71/13 105/25 112/5 116/24
thank [44] 5/10 8/14 10/4 10/5 10/10 13/18 18/9 29/11 29/23 30/2 30/19 33/5 33/19 34/1 34/2 34/3 34/12 34/23 34/24 35/12 36/6 38/7 38/25 39/20 42/12 44/14 53/2 53/21 71/8 71/20 74/6 75/22 79/24 82/11 88/22 91/4 100/22 101/22 106/15 125/17 126/24 131/11 141/22 141/22
that [552]
that'd [1] 108/3
that'll [1] 72/24
that's [194]
theft [1] 44/8
their [9] 6/22 20/11 22/23 24/9 27/3 27/17 32/20 56/7 124/23
them [40] 13/12 16/9 19/24 21/7 31/24 32/9 32/19 32/19 32/24 33/3 36/18 36/18 40/8 40/21 43/16 45/23 58/20 59/9 59/23 62/1 65/19 67/15 68/8 68/11 68/11 68/11 68/16 68/17 68/20 68/23 84/25 85/9 86/4 86/5 86/7 100/10 106/1 109/16 138/4 138/6
themselves [1] 36/16
then [106] 2/22 4/1 6/9 6/9 8/3 8/7 9/6 10/2 11/22 11/25 12/10 12/21 14/6 16/3 16/25 18/13 19/15 19/17 20/9 21/5 21/9 21/19 22/21 23/6 24/4 25/1 25/3 25/3 25/4 25/17 26/2 26/3 26/9 26/9 26/20 28/20 31/11 32/14 41/16 42/8 42/19 42/20 42/21 43/1 46/3 46/20 47/24 48/7 48/10 48/17 51/1 52/4 53/18 54/2 54/9 54/20 55/4 55/23 55/24 58/9 58/12 58/17 59/4 59/12 59/17 61/8 62/15 63/20 63/24 65/9 67/2 69/25 71/5 71/12 77/7 80/14 85/10 87/22 88/19 88/23 90/4 90/11 92/8 93/13 98/1 98/10 98/16 99/11 100/17 102/3 102/23 104/1 111/3 111/15 114/16 117/15 120/15 122/1 125/10 127/22 131/23 133/13 135/12 136/12 137/24 139/6
theoretically [1] 59/5
there [36] 5/22 6/4 12/19 15/9 20/2 26/13 30/1 32/19 35/18 36/4 37/19 52/9 52/10 54/22 57/19 59/3 59/6 59/18 67/8 67/17 68/22 73/22 73/23 77/1 77/1 90/25 98/19 99/16 103/22 104/14 107/11 107/13 110/15 111/14 121/3 137/19
there'll [1] 31/21
there's [27] 2/25 7/24 10/1 11/14 11/15 13/12 14/24 15/4 18/23 21/14 24/11 24/22 25/6 25/16 32/20 35/24 52/11 52/15 59/12 59/14 66/25 67/5 110/3 115/16 116/23 129/24 140/10
thereto [3] 49/23 50/4 95/18
these [50] 5/22 6/25 7/2 7/10 8/18 9/3 9/4 9/10 10/15 12/20 15/3 17/21 19/3 19/6 20/18 21/4 21/16 40/2 45/18 46/10 52/23 56/3 57/20 57/23 58/23 59/5 59/8 59/9 61/22 67/17 67/19 70/7 70/8 76/1 77/16 80/24 85/2 97/7 100/9 100/24 101/19 102/11 120/18 124/1 124/20 124/20 127/25 128/1 128/2 128/4
they [50] 5/15 6/18 6/18 6/19 7/3 7/4 7/4 8/7 9/8 9/9 10/3 12/25 13/1 15/25 18/11 18/11 19/3 19/9 19/15 19/15 20/8 24/8 25/1 25/17 26/9 26/12 26/12 27/7 27/15 27/16 36/18 43/11 54/10 57/14 57/14 65/10 66/6 69/5 85/3 98/25 99/3 99/7 112/25 112/25 119/5 121/10 130/13 140/6 140/9 140/13
they're [24] 6/15 7/8 7/11 8/18 8/21 9/21 13/22 18/21 19/4 19/7 19/9 19/10 21/6 24/13 24/22 25/17 31/2 33/11 58/23 88/2 95/3 100/12 138/1 140/14
they've [2] 11/15 22/15
thing [15] 3/16 5/9 14/24 18/22 20/11 21/19 25/18 56/6 57/6 81/7 83/9 102/18 108/4 116/12 130/4
things [11] 10/7 10/19 10/23 12/12 12/14 21/5 21/15 25/2 36/15 90/12 128/21
think [110] 5/6 6/7 6/8 7/11 7/23 9/3 9/12 9/25 12/7 13/7 13/23 14/1 14/20 16/9 16/11 17/16 19/5 19/12 20/4 20/15 22/2 22/13 24/24 25/15 27/5 28/23 29/6 29/15 29/25 30/14 30/21 30/23 32/10 33/11 36/20 38/23 41/11 41/13 54/10 56/6 59/18 59/18 59/24 60/3 61/6 62/25 64/24 65/9 65/12 65/20 66/7 66/8 66/24 67/6 67/7 67/9 67/11 67/16 67/22 71/16 72/14 78/5 81/24 84/1 85/5 85/8 87/11 88/8 91/2 91/10 93/21 93/25 97/1 97/8 98/11 98/23 98/25 99/3 99/8 102/3 106/4 106/11 107/19 107/21 111/12 111/13 116/23 117/1 117/8 118/12 121/5 121/7 122/1 122/2 122/7 122/9 122/12 123/19 126/14 126/17 126/25 128/20 130/1 130/19 132/24 137/24 139/8 140/5 140/10 143/5
thinks [1] 15/14
third [4] 12/10 64/20 91/14 93/22
this [203]
thoroughly [1] 22/15
those [59] 6/12 6/14 7/21 7/24 8/4 9/6 9/7 9/14 9/19 9/20 10/20 10/23 18/20 21/8 21/15 21/17 21/19 22/11 27/10 35/8 36/15 43/7 43/11 58/1 58/22 59/11 68/7 68/15 76/1 76/2 76/11 76/12 76/13 79/4 80/15 83/3 85/13 86/2 87/5 87/24 88/1 96/21 96/25 98/4 102/17 105/24 106/2 109/12 110/13 110/17 110/25 111/22 113/1 117/16 124/11 124/13 140/12 140/19 141/18
though [6] 28/16 28/24 40/21 47/8 119/10 125/21
thought [4] 13/14 16/13 105/6 116/2
thoughts [2] 14/13 20/10
thousand [1] 97/10
three [7] 22/14 28/6 71/14 72/2 142/24 142/25 143/1
threw [1] 73/2
through [21] 13/3 38/16 39/6 40/21 43/10 45/20 45/23 53/5 56/8 58/20 59/2 66/25 68/4 68/24 69/2 100/11 110/11 124/22 134/9 138/7 143/9
throughout [1] 71/21
tidal [1] 3/23
till [2] 19/16 32/4
time [32] 3/1 4/14 5/4 5/7 5/13 6/11 7/16 12/8 13/1 13/5 13/8 18/7 20/1 40/14 40/17 40/20 43/14 44/17 58/3 63/13 64/6 66/10 68/5 69/20 78/17 79/1 92/10 96/24 103/1 111/5 126/3 133/5
timeframe [2] 22/21 63/14
times [5] 47/18 100/6 142/24 142/25 143/1
timing [2] 11/3 22/5
tired [1] 70/4
title [33] 1/18 2/9 9/19 13/2 13/23 15/5 18/12 18/19 19/7 19/9 19/10 19/12 21/11 21/16 21/22 23/17 41/6 46/9 72/11 73/13 73/21 74/8 82/8 82/18 84/9 87/13 87/20 90/5 91/12 93/2 114/5 119/6 126/4
title's [1] 15/3
titled [3] 41/4 84/7 84/15
titles [1] 26/5
today [15] 3/8 19/15 20/8 20/12 24/7 24/15 26/1 26/7 26/19 27/21 28/1 31/3 31/23 102/8 143/9
together [8] 16/12 22/1 26/15 28/8 30/24 34/4 34/20 140/9
Togliatti [1] 42/16
told [9] 4/17 79/14 82/3 82/13 117/19 119/5 132/25 135/11 135/12
tomorrow [2] 102/8 143/13
too [9] 16/9 25/17 64/6 70/4 83/13 100/13 [illegible] 128/12
took [1] 120/16
top [8] 51/12 52/11

T

top... [6] 61/9 61/20 61/21 88/24 105/9 109/1
topic [1] 129/19
total [4] 83/20 89/9 89/15 110/15
totally [2] 24/6 38/15
track [1] 30/21
TRAN [1] 1/1
transactions [2] 71/23 140/7
transcribed [2] 1/25 144/10
Transcriber [1] 144/14
transcript [4] 1/8 81/12 81/17 116/9
transfer [2] 72/8 73/10
transferred [7] 90/1 90/9 90/16 92/3 92/6 130/23 137/12
treble [3] 142/18 142/24 142/25
trial [25] 2/21 2/22 2/25 3/15 5/19 7/25 8/3 8/22 11/5 11/7 11/24 13/6 16/14 20/12 24/9 26/4 27/17 31/24 32/10 32/13 34/14 36/23 48/12 67/1 93/11
trial's [1] 25/4
tricked [3] 17/22 88/14 109/2
tried [1] 100/5
triple [3] 99/13 99/14 129/21
trouble [1] 99/23
troubled [1] 99/20
true [3] 41/18 85/21 100/5
truly [1] 144/9
trust [41] 72/9 72/9 73/11 73/12 73/20 73/24 74/8 76/18 76/23 77/8 79/1 80/14 82/17 82/18 83/22 90/23 91/2 112/10 112/12 113/1 113/10 113/12 113/15 113/25 114/4 114/7 114/9 114/14 114/18 115/4 115/25 117/15 123/10 131/24 132/1 132/2 132/4 132/17 134/14 136/13 137/10
try [9] 8/25 9/13 14/8 14/8 21/7 21/20 27/16 103/8 133/4
trying [4] 13/4 14/3 83/6 134/5
turned [1] 133/13
two [29] 5/21 5/23 6/25 9/14 19/17 20/8 22/14 24/11 26/23 27/10 41/4 47/15 62/1 77/8 80/12 84/7 84/15 85/3 88/3 88/3 101/19 109/4 109/5 109/6 117/14 117/16 127/22 137/19 138/21
type [1] 48/2

U

ultimately [1] 12/9
Um [1] 78/22
Um-hum [1] 78/22
unable [1] 11/21
under [13] 7/10 23/1 43/20 43/20 47/19 48/8 51/2 60/6 83/22 89/18 111/6 111/16 117/24
underneath [1] 105/19
understand [9] 11/3 20/4 29/10 29/12 36/19 50/15 58/13 101/11 101/11
understanding [1] 21/21
understood [14] 25/11 29/20 30/2 34/10 34/18 38/18 41/8 42/21 45/19 52/7 52/25 84/11 92/17 106/12
Unfortunately [1] 128/25
uninsured [2] 59/3 107/13
unique [3] 28/8 100/15 128/2
Unit [2] 70/17 71/1
unlawful [4] 46/13 51/19 91/7 93/5
unless [1] 20/6
unnecessary [1] 24/21
unopposed [1] 8/5
unseal [1] 116/15
until [13] 4/3 4/4 4/5 9/17 9/18 25/9 30/23 31/18 68/2 71/24 79/13 79/21 103/14
up [66] 1/13 6/1 6/18 6/19 7/7 8/4 8/25 9/15 9/17 11/6 12/13 13/2 13/21 20/19 21/18 22/20 24/7 24/25 25/19 26/1 26/17 27/21 28/25 29/7 29/17 30/8 31/22 33/6 33/21 37/4 37/12 38/15 39/4 39/17 44/25 48/13 48/14 52/19 55/4 55/24 58/10 60/19 63/24 67/1 68/22 69/3 74/1 75/17 76/9 80/2 96/20 96/24 96/24 97/25 102/5 103/18 105/16 105/19 106/21 107/23 108/25 112/2 114/17 118/9 123/15 124/6
upfront [1] 62/17
upload [1] 4/25
uploaded [1] 4/20
upon [5] 12/23 13/1 29/17 44/6 106/19
ups [1] 37/18
us [5] 9/8 14/9 26/4 108/12 142/11
use [4] 35/20 50/8 116/18 119/1
used [2] 50/14 100/6
using [2] 46/9 93/1
usually [1] 14/1

V

value [6] 49/14 89/16 94/19 94/25 133/9 141/17
VEGAS [6] 2/1 70/14 70/16 70/22 70/25 71/17
verification [1] 44/6
versus [4] 10/21 10/21 13/10 29/16
very [64] 3/20 6/3 9/12 9/12 9/16 10/12 10/19 11/5 12/19 14/2 14/7 14/7 14/9 14/9 14/10 14/19 16/12 16/15 17/3 18/24 21/1 21/2 21/13 21/14 28/7 30/21 34/13 34/15 34/16 34/19 34/21 36/4 38/21 38/22 38/22 39/25 47/8 51/15 57/11 57/21 58/18 66/6 69/6 69/9 69/14 71/4 73/17 75/13 76/15 77/14 78/3 85/17 86/16 95/4 99/7 100/15 108/12 109/15 116/14 121/2 122/11 125/16 125/18 130/7
vetted [1] 22/15
video [2] 45/7 144/10
view [1] 67/18
violating [2] 50/19 50/23
violation [6] 44/25 48/10 49/22 50/2 95/17 107/23
void [3] 15/17 15/18 19/11

W

wait [17] 19/16 28/24 35/3 45/10 51/14 77/22 80/19 93/23 104/22 107/7 126/14 127/18 132/10 135/1 136/14 137/7 140/23
waiting [4] 38/21 73/1 75/25 79/19
waive [3] 3/5 3/7 111/16
waived [3] 101/15 101/18 111/19
waives [1] 100/25
waiving [4] 101/3 101/5 142/15 143/1
walk [5] 24/15 24/17 24/18 56/8 59/2
want [62] 3/19 5/4 8/10 10/9 10/14 11/3 11/4 11/6 22/7 26/1 26/12 27/5 27/7 27/15 28/19 30/13 31/10 31/13 31/25 34/3 34/25 35/5 35/10 35/17 36/22 37/7 37/11 37/15 40/17 43/5 43/13 48/22 53/22 55/16 55/19 56/1 58/4 58/13 58/15 59/10 68/7 68/14 68/20 70/8 74/1 81/5 81/15 83/11 86/2 86/3 94/24 96/16 100/7 100/17 101/24 104/7 122/15 122/17 122/17 131/15 138/9 140/20
wanted [10] 3/24 5/7 8/16 8/17 9/15 65/3 68/10 74/23 75/8 80/24
wants [2] 6/2 25/23
warm [1] 125/16
warranty [4] 72/8 73/11 80/13 117/15
was [141] 2/21 2/22 4/1 4/2 4/5 4/5 4/14 4/17 4/17 4/18 4/19 5/16 7/13 9/18 11/24 11/24 13/14 16/9 16/10 16/14 17/3 17/22 18/23 24/1 24/16 25/9 25/10 25/16 25/21 40/3 40/3 40/4 41/5 41/17 41/25 42/4 46/13 46/17 47/18 47/20 47/21 47/21 54/11 54/13 54/17 54/22 56/7 57/7 57/15 57/16 59/3 59/3 64/4 66/7 68/25 69/11 69/20 70/14 71/17 72/5 72/8 72/10 73/7 73/10 73/12 73/23 73/23 75/24 77/13 78/18 79/12 79/19 80/19 81/1 82/3 82/12 83/22 84/8 85/5 86/10 86/21 86/25 88/14 89/1 89/2 92/4 92/7 93/5 93/7 97/8 97/12 98/2 98/4 99/4 104/4 105/1 105/2 105/2 105/4 107/11 107/12 107/13 108/25 109/2 109/18 111/1 111/15 113/25 114/17 115/12 115/14 116/12 116/14 117/2 117/13 117/19 117/25 119/7 119/12 120/5 120/6 120/19 123/3 124/3 126/8 126/12 128/20 130/4 132/25 133/1 133/8 133/12 134/12 135/11 135/12 137/10 137/16 139/24 141/10 142/5 142/12
wasn't [3] 4/3 4/16 59/6
wave [1] 3/24
way [14] 10/20 22/22 24/10 24/10 40/8 68/8 72/25 75/18 75/19 76/10 86/7 102/3 119/2 122/16
Wayne [2] 69/12 69/23
we [279]
we'll [9] 31/11 43/12 55/24 58/9 58/17 64/14 102/20 103/1 111/5
we're [71] 8/3 8/8 9/24 11/21 12/6 12/12 12/13 12/14 13/9 14/8 19/8 19/16 21/13 22/3 23/21 23/21 24/6 24/6 24/19 25/4 25/9 25/13 26/5 30/21 30/24 32/20 32/21 38/24 39/16 40/14 43/9 43/10 45/19 45/23 48/13 48/15 52/1 54/16 56/21 59/10 61/21 64/24 68/10 72/25 73/3 73/6 74/1 75/9 78/5 78/6 81/17 84/21 85/11 86/7 86/14 92/10 99/22 102/25 125/14 125/21 126/12 129/16 131/21 134/4 136/25 138/7 142/1 142/3 142/4 142/11 144/4
we've [18] 11/4 11/9 11/10 20/24 38/22 57/13 65/5 65/14 68/4 68/11 84/14 86/14 96/6 96/14 96/15 100/16 137/6 143/9
WEDNESDAY [2] 1/12 20/3
weigh [1] 20/1
welcome [1] 34/15
well [65] 5/9 7/5 9/6 12/7 12/16 13/20 16/20 17/12 18/16 25/8 29/25 30/22 33/21 34/6 36/13 37/13 37/23 38/20 39/13 39/13 40/20 41/11 41/11 52/21 53/6 54/18 58/22 60/4 63/5 63/7 64/14 66/13 78/21 81/5 81/6 89/7 90/5 90/7 90/8 90/23 97/7 97/25 98/23 100/17 103/10 106/19 110/10 112/16 112/25 114/11 114/24 115/18 116/18 117/10 118/13 120/5 120/8 121/5 121/14 127/16 127/18 129/3 133/4 135/18 139/24
went [7] 39/6 64/19 64/20 64/22 113/10 120/11 141/3
were [31] 4/4 8/17 9/16 9/17 13/1 13/2 13/3 21/16 23/5 24/15 75/25 76/2 76/11 76/12 81/8 81/8 88/8 89/18 107/22 110/16 110/16 110/22 112/1 112/25 112/25 114/17 124/20 127/20 127/20 127/22 138/1
WFG [21] 1/18 2/8 9/10 9/15 12/17 13/5 13/10 [illegible] 27/10 40/4 41/24 41/24 47/19 48/7 59/1 59/4 86/20 105/18

W

WFG... [2] 107/13 116/14
WFG's [2] 23/17 47/21
what [91] 3/24 5/5 9/1 9/10 9/18 10/24 11/2 11/9 14/12 19/2 20/16 22/5 23/20 23/25 25/23 29/6 39/9 39/11 41/17 42/10 43/9 54/17 57/7 57/19 58/1 59/2 59/2 59/8 59/9 59/9 63/20 64/4 65/5 67/11 77/10 77/22 78/18 79/14 80/19 81/4 85/20 95/10 98/3 100/17 100/20 101/23 102/13 103/1 103/22 103/22 104/19 104/25 105/6 106/12 108/2 108/6 108/9 109/19 110/23 111/13 113/3 115/10 116/25 117/2 118/4 120/9 120/19 120/25 121/16 121/17 121/17 121/18 123/23 127/9 127/14 128/10 128/17 129/2 129/4 129/9 131/9 133/11 133/18 134/24 134/25 135/4 136/10 136/21 137/9 140/16 141/10
what's [5] 2/20 3/6 35/1 140/23 144/2
whatever [6] 8/7 11/20 24/19 26/12 35/24 39/4
when [43] 3/17 3/17 12/13 12/25 21/3 24/17 31/1 40/24 42/15 47/22 51/5 68/20 70/11 74/24 75/24 75/25 76/11 81/17 83/21 92/3 92/6 96/20 96/23 102/20 105/16 107/21 108/14 110/22 112/1 114/17 115/1 120/13 124/19 124/20 125/25 127/18 127/19 127/20 127/20 127/20 130/10 130/13 143/9
where [23] 3/22 5/17 7/13 12/23 25/1 37/4 39/7 49/23 50/3 52/24 53/16 60/5 73/2 85/9 95/18 118/4 121/21 121/22 121/23 128/24 135/7 137/9 139/11
Whether [1] 19/1
which [63] 5/22 7/14 10/16 16/4 16/10 23/2 26/6 29/25 38/19 38/21 39/7 41/3 41/7 44/11 44/16 45/16 48/2 48/12 48/13 48/21 50/19 50/23 54/10 57/5 66/20 67/2 67/12 67/18 68/19 70/19 72/5 73/7 73/23 82/18 84/14 85/4 85/11 89/17 92/10 92/13 96/21 97/7 97/9 97/12 100/5 108/25 109/19 110/4 111/25 117/2 124/15 126/2 127/6 134/13 135/9 136/2 137/9 138/24 142/11 142/12 142/18 142/19 142/23
while [3] 34/21 58/7 142/3
white [2] 50/10 50/14
who [3] 6/5 27/6 27/9
Who's [1] 27/4
whole [1] 122/16
whom [1] 48/1
whose [1] 44/20
why [16] 15/9 32/6 32/22 32/24 50/11 54/5 55/22 63/7 63/8 77/17 80/23 83/19 100/7 108/15 109/7 125/4
will [33] 6/18 14/23 22/8 22/23 27/16 29/9 30/7 31/11 32/12 32/14 32/18 51/23 51/24 63/6 65/9 65/17 66/4 93/8 97/6 98/12 100/17 101/14 102/4 102/22 105/12 108/16 108/18 113/17 127/19 128/5 130/9 143/11 143/13
willing [1] 19/7
wish [1] 144/1
withdrawn [1] 6/5
within [3] 29/25 40/4 47/20
without [5] 17/17 47/15 55/1 87/13 126/4
witness [3] 27/7 38/2 44/7
wonderful [1] 34/20
wondering [1] 6/1
words [2] 30/5 48/4
work [8] 10/13 14/1 16/11 16/12 22/1 22/23 103/10 103/11
workable [1] 22/16
worked [3] 13/6 26/15 34/19
working [4] 4/5 28/7 30/24 34/3
works [1] 12/7
worry [1] 83/11
would [42] 3/1 4/6 5/13 9/4 9/23 9/23 10/1 10/2 10/3 12/8 12/19 19/12 19/18 21/15 21/15 22/5 22/16 23/5 23/6 23/6 23/7 26/3 26/3 27/19 27/20 27/20 31/3 33/10 33/13 44/2 54/25 79/10 79/19 79/20 83/20 97/4 97/9 99/8 102/3 110/7 125/15 127/16
wouldn't [4] 26/8 26/8 33/14 121/15
wrap [3] 58/10 102/23 144/6
write [5] 54/1 64/25 81/16 109/10 118/20
writing [2] 56/20 102/7
written [3] 25/6 28/1 110/8
wrong [1] 144/2

X

XIV [1] 1/6

Y

yeah [112] 3/4 5/15 15/3 17/15 18/8 18/16 19/24 20/5 20/14 25/11 30/1 32/4 35/7 35/7 35/7 35/11 35/19 36/10 36/15 37/9 39/1 40/15 40/24 41/14 43/5 45/21 47/10 48/15 49/2 50/7 52/13 52/23 54/4 54/7 54/13 56/4 57/7 57/22 58/6 58/8 58/11 58/23 59/2 60/24 62/12 62/17 63/4 64/16 64/21 64/23 65/2 65/21 66/13 68/7 68/18 69/16 69/22 72/22 73/7 74/17 79/6 82/24 85/15 89/4 90/20 91/1 92/15 93/18 95/1 95/13 96/1 99/6 101/7 101/25 102/10 105/9 106/10 107/1 107/4 107/14 108/14 109/8 111/18 112/8 112/13 114/9 115/20 115/21 116/13 116/16 116/19 116/22 120/15 122/4 123/16 124/11 124/16 125/1 126/21 127/11 131/8 131/15 131/18 132/24 133/17 135/16 136/24 137/17 138/6 139/14 141/17 141/21
year [3] 42/10 75/24 120/25
years [2] 17/8 36/12
Yep [14] 56/17 57/25 69/1 76/22 92/11 105/14 107/24 108/17 109/13 109/22 113/18 124/7 138/22 144/5
yes [119] 5/9 5/12 5/20 8/15 12/5 16/18 16/20 18/2 20/13 26/20 27/2 27/14 28/2 29/5 29/11 31/8 31/8 32/17 32/25 36/4 37/6 37/20 39/18 43/8 45/6 45/12 45/14 46/11 46/16 47/6 50/6 53/5 53/21 55/2 56/20 57/20 59/22 61/14 61/16 61/23 62/3 70/10 72/19 75/4 75/7 75/12 77/21 77/24 78/6 79/7 80/7 80/10 80/22 80/25 81/3 81/14 81/14 82/10 83/5 84/3 85/13 86/18 87/25 88/21 88/25 91/19 91/24 92/1 92/22 94/10 98/22 101/13 103/5 103/12 103/24 104/9 104/18 105/5 110/2 111/21 112/22 112/25 113/5 113/7 115/6 115/23 116/12 119/25 120/8 120/22 120/24 121/13 122/20 123/7 123/12 124/16 125/3 125/9 125/19 126/10 127/13 127/18 128/12 128/19 129/8 129/13 129/21 131/2 131/20 135/15 136/17 138/18 139/1 139/5 139/21 140/3 140/18 141/6 142/7
yesterday [4] 2/21 4/2 5/17 16/22
yet [10] 15/22 15/24 16/4 72/13 85/11 129/14 131/25 136/6 137/14 137/24
you [332]
You'll [1] 108/14
you're [24] 3/21 4/17 13/22 21/3 23/13 28/7 30/21 31/25 33/7 34/15 37/23 40/16 57/17 62/5 66/19 78/6 83/13 105/16 117/24 127/19 138/2 138/12 140/20 144/2
you've [12] 2/23 16/16 34/19 65/13 66/20 66/21 66/23 66/24 78/12 111/16 111/19 113/3
your [57] 2/3 2/11 2/12 4/10 4/14 7/16 8/14 10/7 12/1 14/13 15/22 16/3 23/3 23/4 23/13 25/4 25/21 25/24 25/25 28/2 28/4 29/5 29/6 31/5 32/12 32/17 33/12 34/2 34/24 35/6 36/5 37/24 38/4 39/4 40/14 40/17 40/20 56/5 59/24 66/18 67/17 68/22 74/15 77/17 81/4 82/21 86/9 99/19 109/14 118/9 124/4 125/20 126/21 131/7 131/17 142/18 142/23
yourself [1] 102/2

Z

Zillow [10] 76/19 76/24 79/2 114/19 114/24 115/2 115/5 115/18 115/24 116/1