

IN THE SUPREME COURT OF THE STATE OF NEVADA

THOMAS A. PICKENS, individually, and as) Docket No: 83491
trustee of the LV Blue Trust,)
Appellant,)
vs.)
DANKA K. MICHAELS, individually, and)
as trustee of the Mich-Mich Trust,)
Respondent.)

Electronically Filed
Oct 28 2021 02:47 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

RESPONSE TO APPELLANT'S DOCKETING STATEMENT

COMES NOW Respondent, Danka Michaels, by and through Attorney Jennifer V. Abrams, Esq., and responds to Thomas Pickens' Docketing Statement as follows:

8. Nature of the action: Nowhere in the *Complaint for Divorce and for Set Aside of Deeds of Real Property and Assignment of L.L.C. Interest*, in the *First Amended Complaint for Divorce; For Set Aside of Deeds of Real Property and Assignment of L.L.C. Interest; and for Alternative Equitable Relief Under the Putative Spouse Doctrine*, or in the *Second Amended Complaint for Equitable Relief Under (1) the Putative Spouse Doctrine, and (2) Pursuant to Express and/or Implied Agreement to Hold Property as if the Parties were Married Under Michoff; and to Set Aside Deeds of Real Property and Assignment of L.L.C. Interest* did Thomas Pickens plead a claim "to rescind transfers of property without consideration."

12. Other issues: This case involved the enforcement of a fully performed agreement between unmarried persons (which included valid transfers of property for good and sufficient consideration). The disputed issues of material fact hinged entirely on the evidence presented and the credibility of the parties. There is no substantial issue of first impression.

Dated Thursday, October 28, 2021.

/s/ Jennifer V. Abrams, Esq.
JENNIFER V. ABRAMS, ESQ. (7575)
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Attorney for Respondent

CERTIFICATE OF SERVICE

I hereby certify that the foregoing *Response to Appellant's Docketing Statement* was filed electronically with the Nevada Supreme Court in the above-entitled matter on Thursday, October 28, 2021. Electronic service of the foregoing document shall be made in accordance with the Master Service List, pursuant to NEFCR 9, as follows:

John D. Jones, Esq.
Jones & LoBello
Attorney for Appellant

/s/ Chantel Wade

An employee of The Abrams & Mayo Law Firm