

Form 1. Notice of Appeal to the Supreme Court from a Judgment or Order of a  
District Court

Case # A-21-838187-C

Dept.#22  
Electronically Filed  
Feb 26 2024 11:57 AM  
Elizabeth A. Brown  
Clerk of Supreme Court

IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
IN AND FOR THE COUNTY OF CLARK

A., Plaintiff }

RENE SHERIDAN, an individual.

v. }

B., Defendants }

JOSEPH A.GUTIERREZ, an individual;

STEVEN G. KNAUSS, an individual;

JASON R. MILLER, an individual;

MAIER GUTIERREZ & ASSOCIATES;

a Domestic Professional LLC, and

DOES I-XX, inclusive

### NOTICE OF APPEAL

Notice is hereby given that plaintiff above named, hereby appeals to the Supreme  
Court of Nevada from the order re: defendant's motions in limine entered in this  
action on the 23rd day of January, 2024.

/s/ 

Rene Sheridan

in pro se

23823 Malibu Road, #50-364

Malibu, CA. 90265

Tel. (310) 422-9944

IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE  
STATE OF NEVADA IN AND FOR  
THE COUNTY OF CLARK

RENE SHERIDAN, an individual

Plaintiff

Vs.

JOSEPH A. GUTIERREZ, Esq.

STEVEN G. KNAUSS, Esq.

JASON R. MAIER, Esq.

MAIER GUTIERREZ & ASSOCIATES

Defendants.

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**PLAINTIFF'S APPELLANT'S**  
**CASE APPEAL STATEMENT**

Pursuant to Nevada Rules of Appellate Procedure 3(f)(3), Plaintiff/Appellant

RENE SHERIDAN ("Plaintiff/Appellant") hereby submits the following Case

Appeal Statement:

1. This Case Appeal Statement is filed by Plaintiff/Appellant RENE

SHERIDAN

(Plaintiff/Appellant in the above captioned case against Defendants-Respondents

Joseph Gutierrez, Esq., Steven Knauss, Esq., Jason R. Maier, Esq.,

and Maier Gutierrez & Associates, District Court Case A-21-838187-C.

2. This appeal is from an Order entered by Judge Susan H. Johnson, District

Court Judge dated 23<sup>rd</sup> day of January, 2024.

1       *See* Exhibit 1, (January 23<sup>rd</sup>, 2024 Notice of Entry of Order).

2  
3       3. Plaintiff-Appellant is acting pro per and representing themselves:

4       Rene Sheridan  
5       23823 Malibu Road, #50-364  
6       Malibu, CA. 90265

7       4. Defendant-Respondents Joseph A. Gutierrez, Esq., Steven G. Knauss, Esq.,  
8       Jason R. Maier, Esq., individuals and Maier Gutierrez & Associates, a  
9       Limited Liability Partnership (“Defendant-Respondents”) are represented by  
10      counsel:

11      Respondents Counsel:  
12      Lipson Neilson P.C.  
13      Joseph P. Garin, Esq.  
14      Jonathan K. Wong, Esq.  
15      9900 Covington Cross Drive, Suite 120  
16      Las Vegas, NV 89144

17      5. Plaintiff-Appellant is acting pro per and is not licensed to practice law in the  
18      State of Nevada. Defendants-Respondents are licensed to practice law in the  
19      State of Nevada.  
20      State of Nevada.

21      6. Plaintiff-Appellant is not represented by appointed or retained counsel on  
22      appeal.

23  
24      7. Plaintiff-Appellant has not requested to proceed in forma pauperis.

25      8. Plaintiff-Appellant filed this action on April 14, 2020.

26      9. Plaintiff-Appellant filed this action as Legal Malpractice.  
27  
28

1 Defendant's Motion to Dismiss had been filed, heard and denied in both the  
2 Second and Eighth Judicial District Courts of Nevada.

3 Defendants, in violation of EDCR 2.24/DCR 13(7), retitled the action fictitiously  
4 as "Other Civil Matters ", and added other misinformation into the Court Record.  
5

6 10. Defendants have filed three Motions to Dismiss and two Motions for  
7 Summary Judgment all of which have been denied by the Courts.  
8

9 11. In the Eighth District Court Department No. 22, Judge Susan Johnson  
10 presiding, Plaintiff was denied due process under Nevada law and the United  
11 States Constitution.  
12

13 Judge Johnson, in her chambers, as opposed to open court, chose to ignore  
14 evidence that exceeded any reasonable doubt, evidence that included Defendant's  
15 admissions in deposition of Defendant's guilt, and instead ruled incorrectly to  
16 eliminate Plaintiff's sufficiently pled and well evidenced claims.  
17

18 12. Judge Johnson has effectively eviscerated the claims of the Plaintiff in  
19 violation of NRCP 12(b)(5) which provides "that a complaint should be  
20 dismissed for failure to state a claim only if it appears beyond a doubt that  
21 plaintiff could prove no set of facts which, if true, would entitle plaintiff to  
22 relief." *Buzz Stew, LLC v. N. Las Vegas*, 124 Nev. 224, 228, 181 P3d 670, 672  
23 (Nev. 2008).  
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1 As will be evidenced in the Nevada Supreme Court, Judge Johnson's desire to  
2 dispose of this case exceeded her desire to administer justice under the law.

3 (Please see Exhibit #3 ADR Commissioner's Decision).  
4

5 12. Plaintiff is appealing from an entry of ORDER dated January 23<sup>rd</sup>, 2024. The  
6 filing date for the Motion in Limine had expired by Judge Johnson's own Order.  
7 (See Exhibit #2, Scheduling Order).  
8

9 Judge Johnson, along with the Defendants/Allied Insurance, had the Defendant's  
10 Motion in Limine extended beyond the Judge's due date only in order to  
11 eliminate Plaintiff's well evidenced claims.  
12

13 Please see Judge Johnson Minute Order stating that "these issues must go before  
14 the jury", dated December 14<sup>th</sup>, 2023.

15 (Exhibit #4)  
16

17 13. This case has not been the subject of Appeal in the Supreme Court.

18 14. This case does not involve child custody or visitation.

19 This case involves the possibility of settlement.  
20

21 Dated this 16th Day of February, 2024.  
22

23 

24 Rene Sheridan in pro se)  
25 23823 Malibu Road, #50-364  
26 Malibu, CA. 90265  
27 Tel. (310) 422-9944  
28

**CERTIFICATE OF SERVICE**

I certify that on the date below, I served a copy of this completed PLAINTIFF’S –  
APPELANT’S CASE APPEAL STATEMENT upon all parties as follows:

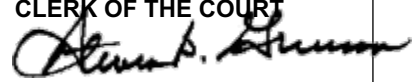
XX- By Electronic Service through Clark County e Filing system.

XX- By mailing first-class mail with sufficient postage prepaid to the  
following address:

Lipson Neilson P.C.  
Joseph P. Garin, Esq.  
Jonathon K. Wong, Esq.  
9900 Covington Cross Drive, Suite 120  
Las Vegas, NV. 89144

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EXHIBIT “1”



**NEOJ**  
LIPSON NEILSON P.C.  
JOSEPH P. GARIN, ESQ.  
Nevada Bar No. 6653  
JONATHAN K. WONG, ESQ.  
Nevada Bar No. 13621  
9900 Covington Cross Drive, Suite 120  
Las Vegas, Nevada 89144  
Phone: (702) 382-1500  
Fax: (702) 382-1512  
[jgarin@lipsonneilson.com](mailto:jgarin@lipsonneilson.com)  
[jwong@lipsonneilson.com](mailto:jwong@lipsonneilson.com)

*Attorneys for Defendants*

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

\* \* \*

RENE SHERIDAN, an individual  
  
Plaintiff,

vs.

JOSEPH A. GUTIERREZ, Esq.  
STEVEN G. KNAUSS, Esq.  
JASON R. MAIER, Esq.  
MAIER GUTIERREZ & ASSOCIATES  
  
Defendants.

) Case No: A-21-838187-C  
) Dept. No.: 22

) **NOTICE OF ENTRY OF ORDER RE:**  
) **DEFENDANTS' MOTIONS IN LIMINE**  
) **NOS. 1, 2 AND 3**

**PLEASE TAKE NOTICE** that an Order Re: Defendants' Motions in Limine Nos. 1, 2  
and 3 was entered by the Court on January 23, 2024, a copy of which is attached hereto.

DATED this 23<sup>rd</sup> day of January, 2024.

LIPSON NEILSON P.C.

By: /s/ Jonathan K. Wong

JOSEPH P. GARIN, ESQ. (Nv Bar No. 6653)  
JONATHAN K. WONG, ESQ. (NV Bar No. 13621)  
9900 Covington Cross Drive, Suite 120  
Las Vegas, Nevada 89144

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b) and Administrative Order 14-2, I certify that on the 23<sup>rd</sup> day of January, 2024, I electronically served the foregoing **NOTICE OF ENTRY OF ORDER RE: DEFENDANTS' MOTIONS IN LIMINE NOS. 1, 2 AND 3** to the following parties utilizing the Court's E-File/ServeNV System:

Michael R. Mushkin, Esq. L. Joe Coppedge, Esq. MUSHKIN & COPPEDGE 6070 S. Eastern Avenue, Suite 270 Las Vegas, Nevada 89119 <a href="mailto:michael@mushlaw.com">michael@mushlaw.com</a> <a href="mailto:lcoppedge@mccnvlaw.com">lcoppedge@mccnvlaw.com</a>	
---	--

*Attorneys for Plaintiff*

/s/ Michele Stones  
An Employee of LIPSON NEILSON P.C.

1 **ORDR**

2 **DISTRICT COURT**

3 **CLARK COUNTY, NEVADA**

4  
5 **RENE SHERIDAN, an individual,**  
6 **Plaintiff,**

**Case No. A-21-838187-C**  
**Dept. No. XXII**

7 **Vs.**

8 **JOSEPH A. GUTIERREZ, an individual;**  
9 **STEVEN G. KNAUSS, an individual;**  
10 **JASON H. MAIER, an individual; MAIER**  
11 **GUTIERREZ & ASSOCIATES, a**  
12 **Domestic Professional LLC; and DOES I-**  
13 **XX, inclusive; and XYZ**  
14 **CORPORATIONS I-XX, inclusive,**  
15 **Defendants.**

16 **ORDER RE: DEFENDANTS' MOTIONS IN LIMINE NOS. 1, 2 AND 3**

17 These matters concerning the Motions in Limine Nos. 1, 2 and 3 filed by Defendants  
18 JOSEPH A. GUTIERREZ, STEVEN G. KNAUSS, JASON H. MAIER and MAIER GUTIERREZ  
19 & ASSOCIATES to:

- 20 1. Exclude Reference to the Satisfaction of Judgment;
- 21 2. Preclude Steven Istock from Testifying as to Damages; and
- 22 3. Preclude Damages Not Disclosed in Plaintiff's Rule 16.1 Disclosures,

23 all filed December 22, 2023 came, *in chambers*, to the attention of Department XXII of the Eighth  
24 Judicial District Court, in and for Clark County, Nevada, with JUDGE SUSAN JOHNSON  
25 presiding, in preparation for the January 30, 2024 hearing. Having reviewed the papers and  
26 pleadings on file herein including Defendants' Motions and Plaintiff's Opposition thereto, and

27 ...

1 finding it unnecessary to hear oral argument, this Court decides the Motions in Limine, and orders as  
2 follows:

3 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED** Defendants' Motion in  
4 Limine No. 1: to Exclude Reference to the Satisfaction of Judgment filed December 22, 2023 is  
5 granted for at least a few reasons: *First*, while the Defendants' Judgment filed against MS.  
6 SHERIDAN is addressed in Paragraph 41 of the Complaint filed August 31, 2020, the fact the  
7 Judgment ultimately was satisfied is not alleged at all within the initial pleading—perhaps as it had  
8 not been satisfied at that point. It follows then, as the Satisfaction of Judgment was not addressed,  
9 the issues relating to causation of damages (if any) resulting from the Notice of Satisfaction of  
10 Judgment not being filed until January 24, 2022 also were not alleged. *Second*, if she believed she  
11 had sustained damages caused by the January 24, 2022 filing of the Notice of Satisfaction of  
12 Judgment, MS. SHERIDAN could have moved this Court to amend her pleading which she did not  
13 do. *Third*, MS. SHERIDAN did not demand a signed Satisfaction of Judgment be provided by  
14 Defendants when the Judgment was satisfied. Further, as fees necessarily are involved to file a  
15 Satisfaction of Judgment with the Court and to record such in the County's Recorder's Office, this  
16 Court finds it was incumbent upon MS. SHERIDAN—the party who would benefit from such a  
17 filing/recording—to do so.

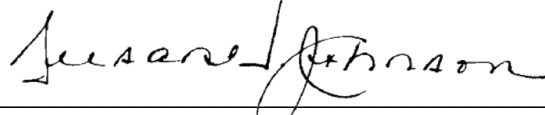
18 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** this Court's ruling  
19 concerning Defendants' Motion in Limine No. 2: to Preclude Steven Istock from Testifying as to  
20 Damages filed December 22, 2023 shall be deferred to the time of trial. With that said, this Court is  
21 mindful, to testify as an expert witness under NRS 50.275, (1) MR. ISTOCK must be qualified in an  
22 area of “scientific, technical or other specialized knowledge” (the qualification requirement); (2) his  
23 specialized knowledge must “assist the trier of fact to understand the evidence or to determine a fact  
24 in issue” (the assistance requirement); and (3) his testimony must be limited “to matters within the  
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1 scope of his specialized knowledge (the limited scope requirement). *See Hallmark v. Eldridge*, 124  
2 Nev. 492, 498, 189 P.3d 646 (2008).

3 **IT IS FURTHER ORDERED, ADUDGED AND DECREED** this Court shall defer its  
4 ruling regarding Defendants' Motion in Limine No. 3: to Preclude Damages Not Disclosed in  
5 Plaintiff's Rule 16.1 Disclosures filed December 22, 2023 to the time of trial. With that said,  
6 damages must be substantiated by the evidence presented at trial. Further, at the outset, MS.  
7 SHERIDAN must have provided "a computation of each category of damages claimed by the  
8 disclosing party—who must make available for inspection and copying as under [NRCP] 34 the  
9 documents or other evidentiary material, unless privileged or protected from disclosure, on which  
10 each computation is based, including materials bearing on the nature and extent of injuries  
11 suffered..." *See* NRCP 16.1(a)(1)(A)(iv).  
12

13 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, as this Court has decided  
14 the issues presented within Defendants' Motions in Limine Nos. 1, 2 and 3, the matters scheduled to  
15 be heard on Tuesday, January 30, 2024 are vacated pursuant to Rule 2.23 of the Eighth Judicial  
16 District Court Rules (EDCR).  
17

18 **Dated this 23rd day of January, 2024**

19 

20 SUSAN H. JOHNSON, DISTRICT COURT JUDGE

21 **D37 1C1 143D ED40**  
22 **Susan Johnson**  
23 **District Court Judge**  
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1 **CSERV**

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3 DISTRICT COURT  
CLARK COUNTY, NEVADA

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6 Rene Sheridan, Plaintiff(s)

CASE NO: A-21-838187-C

7 vs.

DEPT. NO. Department 22

8 Joseph Gutierrez, ESQ,  
9 Defendant(s)

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11 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 1/23/2024

15 Charity Johnson

cmj@mgalaw.com

16 Jason Maier

jrm@mgalaw.com

17 Joseph Gutierrez

jag@mgalaw.com

18 Karen Foley

kfoley@mccnvlaw.com

19 Michael Mushkin

michael@mccnvlaw.com

20 Joseph Garin

jgarin@lipsonneilson.com

21 Jonathan Wong

22 jwong@lipsonneilson.com

23 RENE SHERIDAN

RSHERIDAN34@AOL.COM

24 PATRICK CANNON

HOTOPIX@GMAIL.COM

25 Cristiana Lopez

26 clopez@mccnvlaw.com

27 Michele Stones

mstones@lipsonneilson.com

28

1 Suzanne Zaranti

szaranti@mccnvlaw.com

2  
3 If indicated below, a copy of the above mentioned filings were also served by mail  
4 via United States Postal Service, postage prepaid, to the parties listed below at their last  
5 known addresses on 1/24/2024

6 Kenneth Webster

Hall Prangle & Schoonveld, LLC

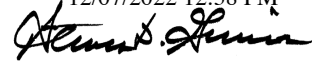
Attn: Kenneth Webster, Esq

1140 North Town Center Drive, Suite 350

Las Vegas, NV, 89144  
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EXHIBIT “2”



CLERK OF THE COURT

SCHTO

DISTRICT COURT  
CLARK COUNTY, NEVADARENE SHERIDAN, an individual,  
Plaintiff,CASE NO.: A-21-838187-C  
DEPT. NO.: XXII

vs.

JOSEPH A. GUTIERREZ, Esq.; STEVEN G.  
KNAUSS, Esq.; JASON R. MAIER, Esq.; MAIER  
GUTIERREZ & ASSOCIATES,

Defendants.

SCHEDULING ORDER AND ORDER SETTING CIVIL JURY TRIALNATURE OF ACTION: **Other Civil Matter**TIME REQUIRED FOR TRIAL: **3-5 days**DATES FOR SETTLEMENT CONFERENCE: **None requested**

Counsel representing all parties and after consideration by the District Court Judge,

IT IS HEREBY ORDERED:

1. All parties shall complete discovery on or before October 11, 2023.
2. All parties shall file motions to amend pleadings or add parties on or before July 13, 2023.
3. All parties shall make initial expert disclosures pursuant to N.R.C.P. 16.1(a)(2) on or before July 13, 2023.
4. All parties shall make rebuttal expert disclosures pursuant to N.R.C.P. 16.1(a)(2) on or before August 11, 2023.

5. All parties shall file dispositive motions on or before November 9, 2023.

Certain dates from your case conference report(s) may have been changed to bring them into compliance with N.R.C.P. 16.1.

Unless otherwise directed by the court, all pretrial disclosures pursuant to N.R.C.P. 16.1(a)(3) must be made at least 30 days before trial.

1 Motions for extensions of discovery shall be made to the Department in strict accordance with  
2 E.D.C.R. 2.35. Discovery is completed on the day responses are due or the day a deposition begins.

3 Unless otherwise ordered, all discovery disputes (except disputes presented at a pre-trial conference  
4 or at trial) must first be heard by the Discovery Commissioner.

5 IT IS HEREBY ORDERED THAT:

6 A. The above entitled case is set to be tried to a jury on a five-week stack to begin,  
7 **Monday, February 5, 2024, at 8:30 a.m.**

8 B. A Pre-Trial Conference/Calendar Call with the designated trial attorney and/or parties  
9 in proper person will be held on **Wednesday, January 24, 2024, at 8:30 a.m.** Parties must bring to  
10 Calendar Call the following:

11 (1) Typed exhibit lists;

12 (2) List of depositions;

13 (3) List of equipment needed for trial; and

14 (4) Courtesy copies of any legal briefs on trial issues.

15 C. Parties are **to appear on Wednesday, October 18, 2023, at 8:30 a.m. for a Status**  
16 **Check on the matter.**

17 D. The Pre-trial Memorandum must be filed no later than noon on January 22, 2024,  
18 with a courtesy copy hand delivered to Department XXII. All parties, (Attorneys and parties in  
19 proper person) **MUST** comply with **ALL REQUIREMENTS** of E.D.C.R. 2.67 and 2.69.

20 E. All pre-trial motions, including but not limited to motions in limine, must be in  
21 writing and **filed no later than December 11, 2023**, and must be heard not less than 14 days prior to  
22 trial. The parties must adhere to the requirements set forth within the Eighth Judicial District Court  
23 Rules (EDCR), and particularly, EDCR 2.47(b), which requires the lawyers personally consult with  
24 one another by way of face-to-face meeting or via telephone conference before a motion in limine  
25 can be filed. **Counsel are required to confer, pursuant to EDCR 2.47 at least two weeks prior to**  
26 **filing any motion in limine.** If a personal or telephone conference was not possible, the attorney's  
27 declaration and/or affidavit attached to the motion in limine shall set forth the reasons. Should a  
28 party and/or his or her attorney fail to abide by the requirements of EDCR 2.47(b) before filing his

1 or her motion in limine, such motion will not be heard by the Court. **Orders shortening time will**  
2 **not be signed except in extreme emergencies. An upcoming trial date is not an extreme**  
3 **emergency.**

4 **Failure of the designated trial attorney or any party appearing in proper person**  
5 **to appear for any court appearances or to comply with this Order shall result in any of the**  
6 **following: (1) dismissal of the action (2) default judgment; (3) monetary sanctions; (4) vacation**  
7 **of trial date; and/or any other appropriate remedy or sanction.**

8 Counsel is required to advise the Court immediately when the case settles or is otherwise  
9 resolved prior to trial. A stipulation which terminates a case by dismissal shall also indicate  
10 whether a Scheduling Order has been filed and, if a trial date has been set, the date of that trial. A  
11 copy should be given to Chambers.

Dated this 7th day of December, 2022



12  
13  
14 **SUSAN H. JOHNSON, DISTRICT COURT JUDGE**  
15 **A1B-B02-4DA6-A437**  
16 **Susan Johnson**  
17 **District Court Judge**  
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1 **CSERV**

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3 DISTRICT COURT  
CLARK COUNTY, NEVADA

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6 Rene Sheridan, Plaintiff(s)

CASE NO: A-21-838187-C

7 vs.

DEPT. NO. Department 22

8 Joseph Gutierrez, ESQ,  
9 Defendant(s)

10  
11 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 12/7/2022

15 Charity Johnson

cmj@mgalaw.com

16 Jason Maier

jrm@mgalaw.com

17 Joseph Gutierrez

jag@mgalaw.com

18 Joseph Garin

jgarin@lipsonneilson.com

19 Kimberly Glad

kglad@lipsonneilson.com

20 Jonathan Wong

jwong@lipsonneilson.com

21 RENE SHERIDAN

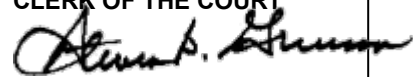
RSHERIDAN34@AOL.COM

22 PATRICK CANNON

HOTOPIX@GMAIL.COM

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EXHIBIT “3”



CDRG

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

Rene Sheridan, Plaintiff(s)

vs.

Joseph Gutierrez, ESQ, Defendant(s)

CASE NO: A-21-838187-C  
DEPT. NO: XXII

**COMMISSIONER'S DECISION ON REQUEST FOR EXEMPTION**

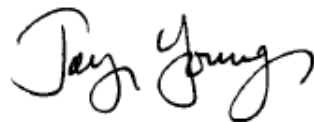
REQUEST FOR EXEMPTION FILED ON: September 14, 2022

EXEMPTION FILED BY: Plaintiff OPPOSITION: No

**DECISION**

Having reviewed the Request for Exemption, and all related pleadings, the Request  
for Exemption is hereby GRANTED.

DATED this 28th of September, 2022.



ADR COMMISSIONER

**NOTICE**

Pursuant to Nevada Arbitration Rule 5(D), you are hereby notified you have five (5) days from the date you are served with this document within which to file written objections with the Clerk of Court and serve all parties. The Commissioner's Decision is deemed served three (3) days after the Commissioner's designee deposits a copy of the Decision in the U.S. Mail. **Pursuant to NEFCR Rule 9(f)(2) an additional 3 days is not added to the time if served electronically (via e-service).**

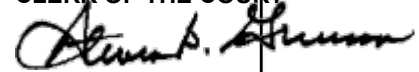
**A copy of the foregoing Commissioner's Decision on Request for Exemption was electronically served, pursuant to N.E.F.C.R. Rule 9, to all registered parties in the Eighth Judicial District Court Electronic Filing Program on the date of e-filing.**

*If indicated below*, a copy of the foregoing Commissioner's Decision on Request for Exemption was also:

☐ Mailed by United States Postal Service, Postage prepaid, to the proper parties listed below at their last known address(es) on \_\_\_\_\_, 2022.

Rene Sheridan  
23823 Maliby RD #50-364 Malibu, CA

/s/ Loretta Walker  
ADR COMMISSIONER'S DESIGNEE



1 ABREA  
2 Rene Sheridan  
3 23823 Malibu Road, #50-364  
4 Malibu, CA 90265  
5 Tel: 310-422-9944  
6 In Pro Per

7 **EIGHTH JUDICIAL DISTRICT COURT**  
8 **CLARK COUNTY, NEVADA**

9 RENE SHERIDAN, an individual,  
10 Plaintiff,

11 v.

12 Case No. A-21-838187-C  
13 Dept. No. 22

14 JOSEPH A. GUTIERREZ, an individual;  
15 STEVEN G. KNAUSS, an individual;  
16 JASON R. MAIER, an individual;  
17 MAIER GUTIERREZ & ASSOCIATES;  
18 A Domestic Professional LLC, and  
19 DOES I-XX, inclusive, and XYZ  
20 CORPORATIONS' I-XX, inclusive,

21 Defendants.

22 **REQUEST FOR EXEMPTION FROM ARBITRATION**

23 Plaintiff hereby requests the above-entitled matter be exempted from The Court Annexed  
24 Arbitration Program pursuant to Nevada Arbitration Rules 3 and 5, as this case:

- 25 1. \_\_\_\_ presents a significant issue of public policy;  
2 2. X involves an amount in excess of \$50,000 per Plaintiff, exclusive of interest and  
3 costs;  
4 3. \_\_\_\_ presents unusual circumstances which constitute good cause for removal from  
5 the program.

6 A specific summary of the facts which supports the Plaintiff's contention for exemption  
7 is as follows:

8 This is a Legal Malpractice case in which the Plaintiff's former attorneys caused significant  
9 damage to the Plaintiff's credit worthiness and professional reputation. The Plaintiff's former  
10 attorneys worked against their client's interest by engaging in the following acts.

1  
2  
3 1. Created a one-sided Settlement Agreement that was damaging to their client and  
4 beneficial to the opposing Parties.

5 2. The Plaintiff violated and breached the Plaintiff's Settlement Agreement's essential  
6 material term in the Confidentiality Clause by publicly disclosing the financial terms of the  
7 Agreement without redaction, causing significant harm to the Plaintiff's professional reputation  
8 and ability to raise financing.

9 3.. The Plaintiff's former attorneys openly colluded with the opposing attorneys to  
10 receive inflated billing from Plaintiff directly from Plaintiff's Settlement award in a conflict of  
11 Plaintiff's Attorney/Client relationship.


12 4. Plaintiff's former attorneys then placed an unnecessary Judgement against the  
13 Plaintiff in the amount of their inflated billing with the knowledge that their full payment of legal  
14 fees was assured, and after receiving these funds refused to file the legally mandatory  
15 Satisfaction of Judgment for over 706 days furthering the damage to their former client.  
16 The illegal and unethical actions by the Plaintiff's former attorneys caused damage in excess of  
17 three million dollars (\$3,000,000) and the Plaintiff asks the Court for this Exemption from  
18 Arbitration for the reasons stated above.

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25 Please see attached Exhibits 1-3.

1 I hereby certify pursuant to N.R.C.P. 11 this case is included within the exemption(s) marked  
2 above and am aware of the sanctions which may be imposed against any attorney or party who  
3 without good cause or justification attempts to remove a case from the arbitration program.

4 I further certify pursuant to NRS Chapter 239B and NRS 603A.040 that this document  
5 and any attachments thereto do not contain personal information including, without limitation,  
6 home address/phone number, social security number, driver's license number or identification  
7 card number, account number, PIN numbers, credit card number or debit card number, in  
8 combination with any required security code, access code or password that would permit access  
9 to the person's financial account.

DATED this 14th day of September, 2022.

10   
11 Rene Sheridan  
12 23823 Malibu Road #50-364  
13 Malibu, CA. 90265  
14 Tel: 310-422-9944  
15 *In Pro Per*

16 CERTIFICATE OF SERVICE

17 I hereby certify that on the 14th day of September, 2022 I mailed a copy of the foregoing  
18 REQUEST FOR EXEMPTION FROM ARBITRATION in a sealed envelope to the following  
19 counsel of record and that postage was fully prepaid thereon *OR* this document was served via E-  
20 Service:  
21

22 LIPSON NEILSON P.C.  
23 JOSEPH P. GARIN, Esq.  
24 JONATHON K. WONG, Esq.  
25 9900 Covington Cross Drive, Ste #120  
Las Vegas, Nevada 89144  
Phone: (702) 382-1500

List of Exhibits

Ex No.	Description
--------	-------------

- |    |  |
|----|--|
| 1. | Defendant Joseph Gutierrez's Admission of his Firm's Legal Malpractice |
| 2. | 16 August 2022- filed- attorney- satisfaction of judgment              |
| 3. | Senior Moment- Sales Estimates- 11 April 2017                          |

# EXHIBIT “1”

-----Original Message-----

From: Joseph Gutierrez <jag@mgalaw.com>

To: hotopix <hotopix@gmail.com>; rsheridan34 <rsheridan34@aol.com>

Sent: Sun, Oct 28, 2018 10:22 am

Subject: RE: Notes on Motion and oral argument

Rene/Patrick,

After going through our *filed* limited opposition to the motion to enforce settlement, I realized that our office made the mistake of not redacting the settlement amounts contained in the emails attached as Exhibit 5 to our opposition brief that was ultimately used as Exhibit A to the Defendants' reply brief.

I take full responsibility for this mistake and I intend on correcting it as follows:

1. File the attached motion to redact Exhibit 5 and Defendants' Exhibit A tomorrow morning (or put a stipulation on the record if Defendants agree to file redacted versions of this document).
2. As an alternative to the motion (or stipulation if Defendants will stipulate), is for me to request orally tomorrow that that Judge Denton strike both the opposition and reply from the record, and allow both parties to refile them with proper redactions.

Given that the filing of this unredacted exhibit was my mistake, I cannot take to position in court tomorrow that Defendants breached the confidentiality portion of the Material Terms agreement by refiling the unredacted email exhibit in support of their reply brief.

Defendants are not taking the position that this filing was a breach of any kind on your part, as their reply is still focusing on confirming the settlement agreement based on the Material Terms document.

Therefore, my focus tomorrow will be to argue the merits of the opposition to the enforce settlement agreement by attacking Sedlak's failure to appear to the MSC, Defendants' failure to comply with the material terms of indemnity and payment, and requesting sanctions for Sedlak's failure to appear.

I am in the office for the next few hours if you want to discuss.

If not, I will plan on seeing you tomorrow morning at 7am at the Tuscany to drive you to court and prepare for the hearing.

**Joseph A. Gutierrez**  
**MAIER GUTIERREZ & ASSOCIATES**  
8816 Spanish Ridge Avenue  
Las Vegas, Nevada 89148  
Tel: 702.629.7900 | Fax: 702.629.7925  
jag@mgalaw.com | www.mgalaw.com

# EXHIBIT “2”



**SATF**

JOSEPH A. GUTIERREZ, ESQ.

Nevada Bar No. 9046

JASON R. MAIER, ESQ.

Nevada Bar No. 8557

**MAIER GUTIERREZ & ASSOCIATES**

8816 Spanish Ridge Avenue

Las Vegas, Nevada 89148

Telephone: 702.629.7900

Facsimile: 702.629.7925

E-mail: [jag@mgalaw.com](mailto:jag@mgalaw.com)

[jrm@mgalaw.com](mailto:jrm@mgalaw.com)

*Former Attorneys for Plaintiffs/Counter-Defendants*

*Rene Sheridan and GoRock LLC*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

RENE SHERIDAN, an individual; and  
GOROCK, LLC, a Delaware limited liability  
company,

Plaintiffs,

vs.

GINA GOFF, an individual; GOFF  
PRODUCTIONS, LLC, a California limited  
liability company, SENIOR MOMENT MOVIE,  
LLC, a California limited liability company;  
RUDOLF SEDLAK, an individual; DOES I-X,  
inclusive; and ROE CORPORATIONS I-X,  
inclusive,

Defendants.

Case No.: A-17-756902-B

Dept. No.: XIII

**SATISFACTION OF  
JUDGMENT ON ATTORNEY LIEN**

**AND RELATED COUNTERCLAIMS.**

Maier Gutierrez & Associates hereby acknowledges that the judgment on attorney lien entered in this matter on January 24, 2019, in favor of Maier Gutierrez & Associates and against Rene Sheridan and GoRock, LLC, in the total sum of \$118,715.25, was satisfied by Senior Moment Movie, LLC, on September 9, 2020.

///

Accordingly, Maier Gutierrez & Associates hereby authorizes and directs the Clerk of the Court to enter this satisfaction of judgment.

DATED this 16th day of August, 2022.

Respectfully submitted,

**MAIER GUTIERREZ & ASSOCIATES**

/s/ Jason R. Maier

JOSEPH A. GUTIERREZ, ESQ.

Nevada Bar No. 9046

JASON R. MAIER, ESQ.

Nevada Bar No. 8557

8816 Spanish Ridge Avenue

Las Vegas, Nevada 89148

*Former Attorneys for Plaintiffs/Counter-*

*Defendants Rene Sheridan and GoRock LLC*

# EXHIBIT “3”

**PROJECT:** Senior Moment

**CAST:** William Shatner  
Christopher Lloyd  
Jean Smart

Non-contractual estimates based on world wide sales and value.

<b>Territories</b>	<b>Take</b>	<b>Asking</b>
<b>EUROPE</b>		
Benelux	80,000	120,000
France	120,000	150,000
Germany	120,000	140,000
Greece	30,000	50,000
Italy	70,000	90,000
Portugal	30,000	50,000
Switzerland	50,000	50,000
Spain	60,000	80,000
Turkey	15,000	30,000
UK	100,000	120,000
<b>TOTAL EUROPE</b>	<b>675,000</b>	<b>880,000</b>
<b>EASTERN EUROPE</b>		
Bulgaria	20,000	40,000
CEI	60,000	80,000
Czech Republic	30,000	50,000
Ex-Yugoslavia	20,000	40,000
Hungary	30,000	50,000
Poland	30,000	50,000
Romania	20,000	40,000
<b>TOTAL EAST EUR</b>	<b>210,000</b>	<b>350,000</b>
<b>MIDDLE EAST</b>		
Israel	40,000	60,000
Middle East	60,000	80,000
<b>TOTAL MIDDLE E</b>	<b>100,000</b>	<b>140,000</b>
<b>AFRICA</b>		
Africa	80,000	100,000
<b>TOTAL AFRICA</b>	<b>80,000</b>	<b>100,000</b>
<b>OCEANIA</b>		
Australia & NZ	150,000	180,000
<b>TOTAL OCEANIA</b>	<b>150,000</b>	<b>180,000</b>
<b>LATIN AMERICA</b>		
Argentina	60,000	80,000
Brazil	40,000	60,000
Central America	30,000	50,000
Colombia	30,000	50,000
Mexico	60,000	80,000
PAY PAN TV	60,000	80,000
Peru	20,000	40,000
Venezuela	20,000	40,000
East Indies	50,000	60,000
<b>TOTAL LAT. AM.</b>	<b>370,000</b>	<b>540,000</b>
<b>ASIA</b>		
China	70,000	90,000
Hong Kong	60,000	80,000
India	40,000	60,000
Indonesia	30,000	50,000
Japan	80,000	100,000
Korea	60,000	80,000
Malaysia	20,000	40,000
Philippines	30,000	50,000
Singapore	40,000	60,000
Taiwan	20,000	40,000
Thailand	60,000	80,000
<b>TOTAL ASIA</b>	<b>510,000</b>	<b>730,000</b>
<b>TOTAL WORLD</b>	<b>2,095,000</b>	<b>2,920,000</b>
<b>NORTH AMERICA</b>	<b>1,500,000</b>	<b>3,000,000</b>
<b>GRAN TOTAL</b>	<b>3,595,000</b>	<b>5,920,000</b>

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EXHIBIT “4”

Done

A-21-838187-C

DISTRICT COURT  
CLARK COUNTY, NEVADA

Other Civil Matters

COURT MINUTES

December 14, 2023

A-21-838187-C      Rene Sheridan, Plaintiff(s)  
vs.  
Joseph Gutierrez, ESQ, Defendant(s)

Department 22

December 14, 2023      09:00 AM      All Pending Motions

HEARD BY:      Johnson, Susan

COURTROOM:      RJC Courtroom 15D

COURT CLERK:      Graves, Brittany

RECORDER:      Ramirez, Norma

REPORTER:

PARTIES PRESENT:

Jonathan K. Wong

Attorney for Defendant

Michael R. Mushkin

Attorney for Plaintiff

## JOURNAL ENTRIES

## PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Arguments by counsel regarding Motion. COURT ORDERED, Motion DENIED. Court noted these are issues that need to go to the jury.

## MOTION FOR SUMMARY JUDGMENT

Arguments by counsel regarding Motion. COURT ORDERED, Motion DENIED.

PLAINTIFF'S MOTION TO ALTER OR AMEND ORDER ENTERED ON October 14TH, 2003  
Court noted it is inclined to deny this as the order reflected exactly as ordered in court. COURT ORDERED, Motion DENIED.

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT BASED ON PLAINTIFF S FAILURE  
TO PROVIDE DAMAGES COMPUTATION, OR ALTERNATIVELY, FOR RULE 37  
SANCTIONS

Arguments by counsel regarding Motion. COURT ORDERED, Motion DENIED.

Printed Date: 12/22/2023

Page 1 of 1

Minutes Date:

December 14, 2023

Prepared by: Brittany Graves





ASTA

**IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE  
STATE OF NEVADA IN AND FOR  
THE COUNTY OF CLARK**

RENE SHERIDAN,

Plaintiff(s),

vs.

JOSEPH A. GUTIERREZ; STEVEN G. KNAUSS;  
JASON R. MILLER.; MAIER GUTIERREZ &  
ASSOCIATES,

Defendant(s),

Case No: A-21-838187-C

Dept No: XXII

**CASE APPEAL STATEMENT**

1. Appellant(s): Rene Sheridan

2. Judge: Susan Johnson

3. Appellant(s): Rene Sheridan

Counsel:

Rene Sheridan  
23823 Malibu Rd., #50-364  
Malib, CA 90265

4. Respondent (s): Joseph A. Gutierrez; Steven G. Knauss; Jason R. Miller; Maier Gutierrez & Associates

Counsel:

Joseph P. Garin, Esq.  
9900 Covington Cross Dr., Ste. 120  
Las Vegas, NV 89144

5. Appellant(s)'s Attorney Licensed in Nevada: N/A  
Permission Granted: N/A

Respondent(s)'s Attorney Licensed in Nevada: Yes  
Permission Granted: N/A

6. Has Appellant Ever Been Represented by Appointed Counsel In District Court: No

7. Appellant Represented by Appointed Counsel On Appeal: N/A

8. Appellant Granted Leave to Proceed in Forma Pauperis\*\*: N/A  
*\*\*Expires 1 year from date filed*  
Appellant Filed Application to Proceed in Forma Pauperis: No  
Date Application(s) filed: N/A

9. Date Commenced in District Court: July 20, 2021

10. Brief Description of the Nature of the Action: Unknown

Type of Judgment or Order Being Appealed: Misc. Order

11. Previous Appeal: Yes

Supreme Court Docket Number(s): 84818, 85003

12. Child Custody or Visitation: N/A

13. Possibility of Settlement: Unknown

Dated This 21 day of February 2024.

Steven D. Grierson, Clerk of the Court

/s/ Cierra Borum

Cierra Borum, Deputy Clerk  
200 Lewis Ave  
PO Box 551601  
Las Vegas, Nevada 89155-1601  
(702) 671-0512

cc: Rene Sheridan

**CASE SUMMARY****CASE NO. A-21-838187-C****Rene Sheridan, Plaintiff(s)****vs.****Joseph Gutierrez, ESQ, Defendant(s)**§  
§  
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§

Location: **Department 22**  
 Judicial Officer: **Johnson, Susan**  
 Filed on: **07/20/2021**  
 Case Number History:  
 Cross-Reference Case Number: **A838187**  
 Supreme Court No.: **84818**  
**85003**




**CASE INFORMATION**Case Type: **Other Civil Matters**Case Status: **07/20/2021 Open****DATE****CASE ASSIGNMENT****Current Case Assignment**

Case Number A-21-838187-C  
 Court Department 22  
 Date Assigned 05/02/2022  
 Judicial Officer Johnson, Susan

**PARTY INFORMATION**

		<i>Lead Attorneys</i>
<b>Plaintiff</b>	<b>Sheridan, Rene</b>	<b>Mushkin, Michael R.</b> <i>Retained</i> 702-454-3333(W)
<b>Defendant</b>	<b>Gutierrez, Joseph A, ESQ</b>	<b>Garin, Joseph P</b> <i>Retained</i> 702-382-1500(W)
	<b>Knaus, Steven, ESQ</b>	<b>Garin, Joseph P</b> <i>Retained</i> 702-382-1500(W)
	<b>Maier Gutierrez &amp; Associates</b>	<b>Garin, Joseph P</b> <i>Retained</i> 702-382-1500(W)
	<b>Maier, Jason, ESQ</b>	<b>Garin, Joseph P</b> <i>Retained</i> 702-382-1500(W)

**DATE****EVENTS & ORDERS OF THE COURT****INDEX****EVENTS**

07/20/2021	 Order Granting Motion Filed By: Defendant Gutierrez, Joseph A, ESQ <i>[1] Order Granting Defendants' Motion to Transfer Venue</i>
07/22/2021	 Filing Fee Remittance Filed By: Defendant Gutierrez, Joseph A, ESQ <i>[2] Filing Fee Remittance</i>
07/27/2021	 Motion to Dismiss

**CASE SUMMARY**

**CASE NO. A-21-838187-C**

Filed By: Defendant Gutierrez, Joseph A, ESQ  
*[3] Defendant's Motion to Dismiss Pursuant to NRCP 12(b)(5) [Hearing Requested]*

07/27/2021



Initial Appearance Fee Disclosure

Filed By: Defendant Gutierrez, Joseph A, ESQ  
*[4] Initial Appearance Fee Disclosure*

07/27/2021



Clerk's Notice of Hearing

*[5] Notice of Hearing*

07/27/2021



Certificate of Service

Filed by: Defendant Gutierrez, Joseph A, ESQ  
*[6] Certificate of Service*

08/03/2021



Motion to Strike

Filed By: Plaintiff Sheridan, Rene  
*[7] Plaintiff's Motion to Strike Defendant's Motion to Dismiss and Affidavit for Recusal of Judge Elizabeth Gonzalez Hearing Not Requested*

08/03/2021



Clerk's Notice of Hearing

*[8] Notice of Hearing*

08/03/2021



Certificate of Service

Filed by: Defendant Gutierrez, Joseph A, ESQ  
*[9] Certificate of Service*

08/04/2021



Declaration

*[10] Declaration of Elizabeth Gonzalez*

08/11/2021



Motion to Continue

Filed By: Plaintiff Sheridan, Rene  
*[11] Plaintiff's Ex Parte Motion for Continuance Hearing Not Requested*

08/11/2021



Opposition to Motion

Filed By: Plaintiff Sheridan, Rene  
*[12] Plaintiff's Opposition to Defendant's Motion to Dismiss and Affidavit for Recusal of Judge Elizabeth Gonzalez*

08/12/2021



Clerk's Notice of Hearing

*[13] Notice of Hearing*

08/12/2021



Opposition to Motion to Dismiss

Filed By: Plaintiff Sheridan, Rene  
*[14] Plaintiff's Opposition to Defendant's Motion to Dismiss and Affidavit for Recusal of Judge Elizabeth Gonzalez Hearing Not Requested*

08/17/2021



Opposition to Motion

Filed By: Defendant Gutierrez, Joseph A, ESQ  
*[15] Defendants' Opposition to Plaintiff's Motion to Strike and Affidavit of Recusal*

08/23/2021







Reply to Opposition

Filed by: Plaintiff Sheridan, Rene  
*[16] Plaintiff's Reply to Defendant's Opposition to Plaintiff's Motion to Strike and Affidavit of Recusal Hearing Not Requested*
















# CASE SUMMARY

CASE NO. A-21-838187-C

08/24/2021	 Reply in Support Filed By: Defendant Gutierrez, Joseph A, ESQ <i>[17] Defendants' Reply in Support of Motion to Dismiss Pursuat to NRCp 12(b)(5)</i>
08/25/2021	 Opposition to Motion Filed By: Defendant Gutierrez, Joseph A, ESQ <i>[18] Defendants' Limited Opposition to Plaintiff's Motion for Continuance</i>
08/26/2021	 Reply in Support Filed By: Plaintiff Sheridan, Rene <i>[19] Plaintiff's Reply in Support of Opposition to Defendant's Motion to Dismiss and Reply to Defendant's Motion to Dismiss and Reply to Defendant's Opposition to Plaintiff's Motion for Continuance</i>
09/07/2021	Administrative Reassignment - Judicial Officer Change <i>From Judge Elizabeth Gonzalez to Vacant, DC 11</i>
10/08/2021	 Notice of Default Filed By: Plaintiff Sheridan, Rene <i>[20] Notice of Defendant's Default</i>
10/12/2021	 Motion to Strike Filed By: Defendant Gutierrez, Joseph A, ESQ <i>[21] Defendant's Motion to Strike Plaintiff's Notice of Default Hearing Requested</i>
10/13/2021	 Clerk's Notice of Hearing <i>[22] Notice of Hearing</i>
10/21/2021	 Order <i>[23] Entry of Order</i>
10/25/2021	 Opposition to Motion Filed By: Plaintiff Sheridan, Rene <i>[24] Opposition to Defendant's Motion to Strike Plaintiff's Notice of Defendant's Default</i>
11/03/2021	 Notice of Department Reassignment <i>[25] Notice of Department Reassignment</i>
05/12/2022	 Order <i>[26] Order Communications with Court Staff be in Writing</i>
05/12/2022	 Order <i>[33] Order De-Consolidating Cases and Closing Case No. A-20-813635-C</i>
05/16/2022	 Stipulation and Order Filed by: Plaintiff Sheridan, Rene <i>[27] Stipulation and Order to Continue Hearing</i>
05/30/2022	 Supplement Filed by: Plaintiff Sheridan, Rene <i>[28] Supplemental Information Plaintiff's Supreme Court Notice Of Appeal and Case Appeal Statement</i>

# CASE SUMMARY

CASE NO. A-21-838187-C

05/31/2022	 Notice of Appeal Filed By: Plaintiff Sheridan, Rene <i>[29] Notice of Appeal</i>
06/01/2022	 Notice of Hearing <i>[30] Instructions for Department 22 Hearing Appearances</i>
06/01/2022	 Motion Filed By: Plaintiff Sheridan, Rene <i>[31] Plaintiff's Motion and Affidavit for Recusal of Judge Susan Johnson</i>
06/02/2022	 Affidavit <i>[32] Answer to Plaintiff's Motion and Affidavit for Recusal of Judge Susan Johnson</i>
06/06/2022	 Case Appeal Statement <i>[34] Case Appeal Statement</i>
06/06/2022	 Clerk's Notice of Hearing <i>[35] Notice of Hearing</i>
06/15/2022	 Opposition to Motion Filed By: Defendant Gutierrez, Joseph A, ESQ <i>[36] Defendants Opposition to Plaintiffs Motion and Affidavit for Recusal of Judge Susan Johnson</i>
06/21/2022	 Reply Filed by: Plaintiff Sheridan, Rene <i>[37] Plaintiff's Reply to Affidavit in the Recusal of Judge Susan Johnson</i>
06/28/2022	 Decision and Order <i>[38] Decision and Order</i>
07/07/2022	 NV Supreme Court Clerks Certificate/Judgment - Dismissed <i>[39] Nevada Supreme Court Clerk's Certificate/Remittitur Judgment - Dismissed</i>
07/09/2022	 Notice of Appeal Filed By: Plaintiff Sheridan, Rene <i>[40] Notice of Appeal</i>
07/12/2022	 Case Appeal Statement <i>[41] Case Appeal Statement</i>
07/18/2022	 Plaintiffs List of Documents and Witnesses Filed by: Plaintiff Sheridan, Rene <i>[42] Defendant Joseph Gutierrez's Admission of His Firms Legal Malpractice (Refiled)</i>
07/19/2022	 Plaintiffs List of Documents and Witnesses Filed by: Plaintiff Sheridan, Rene <i>[43] Plaintiff's documents that had been omitted from the court record-HEARING NOT REQUESTED</i>
07/19/2022	 Plaintiffs List of Documents and Witnesses Filed by: Plaintiff Sheridan, Rene

# CASE SUMMARY

CASE NO. A-21-838187-C

	<i>[44] Plaintiff's Legal Malpractice Complaint (Exhibits Filed Separately) -Hearing Not Requested.</i>
07/19/2022	 Exhibits Filed By: Plaintiff Sheridan, Rene <i>[45] Exhibit 1</i>
07/19/2022	 Plaintiffs List of Documents and Witnesses Filed by: Plaintiff Sheridan, Rene <i>[46] Defendant's Motion to Dismiss Pursuant to NRCP 12(B) (5)</i>
07/19/2022	 Plaintiffs List of Documents and Witnesses Filed by: Plaintiff Sheridan, Rene <i>[47] Plaintiff's Opposition to Motion to dismiss (Refiled) Hearing not requested</i>
07/19/2022	 Plaintiffs List of Documents and Witnesses Filed by: Plaintiff Sheridan, Rene <i>[48] Plaintiff's Opposition to Defendant's Request for Sanctions (Refiled) Hearing Not Requested</i>
07/19/2022	 Plaintiffs List of Documents and Witnesses Filed by: Plaintiff Sheridan, Rene <i>[49] Defendant's Motion to Strike Notice of Default</i>
07/19/2022	 Plaintiffs List of Documents and Witnesses Filed by: Plaintiff Sheridan, Rene <i>[50] Order Confirming Same Cause, Transactions and Parties (Refiled) Hearing Not Requested</i>
07/19/2022	 Plaintiffs List of Documents and Witnesses Filed by: Plaintiff Sheridan, Rene <i>[51] Order Denying Defendant's Motion to Dismiss (Refiled) Hearing Not Required</i>
07/19/2022	 Plaintiffs List of Documents and Witnesses Filed by: Plaintiff Sheridan, Rene <i>[52] Defendant Joseph Gutierrez's Admission of His Firm's Legal Malpractice (Refiled) Hearing Not Required</i>
07/20/2022	 Plaintiffs List of Documents and Witnesses Filed by: Plaintiff Sheridan, Rene <i>[53] Defendant's Refusal to File Satisfaction of Judgment in Violation of Professional Ethics and Nevada Law</i>
07/20/2022	 Plaintiffs List of Documents and Witnesses Filed by: Plaintiff Sheridan, Rene <i>[54] Second Judicial District Court State of Nevada - Order Denying Defendant's Motion to Strike Plaintiff's Notice of Default</i>
07/27/2022	 Opposition to Motion Filed By: Plaintiff Sheridan, Rene <i>[55] Plaintiff's Opposition to the Defendant's Motion to Dismiss (Refiled)</i>
07/28/2022	 Notice <i>[56] Notice of Department 22 Courtesy Copy &amp; Appearance Instructions</i>









# CASE SUMMARY

CASE NO. A-21-838187-C

07/28/2022	 Reply Filed by: Defendant Gutierrez, Joseph A, ESQ <i>[57] Defendants Reply To Plaintiffs Rogue Opposition To Their Motion To Dismiss</i>
08/15/2022	 Order Filed By: Defendant Gutierrez, Joseph A, ESQ <i>[58] Order Granting in Part and Denying in Part Defendants' Motion for Sanctions and to Deem Plaintiff a Vexatious Litigant, and Denying Plaintiff's Countermotion for Sanctions Against Defendants</i>
08/16/2022	 Order <i>[59] Order Granting in Part and Denying in Part Defendants' Motion to Dismiss, and Denying Plaintiff's Motion to Strike</i>
08/17/2022	 NV Supreme Court Clerks Certificate/Judgment - Dismissed <i>[60] Nevada Supreme Court Clerk's Certificate/Remittitur Judgment - Dismissed</i>
08/17/2022	 Notice of Entry of Order Filed By: Defendant Gutierrez, Joseph A, ESQ <i>[61] Notice of Entry of Order Granting in Part and Denying In Part Defendants Motion to Dismiss, and Denying Plaintiffs Motion to Strike</i>
08/17/2022	 Notice of Entry of Order Filed By: Defendant Gutierrez, Joseph A, ESQ <i>[62] Notice of Entry of Order Granting in Part and Denying in Part Defendants Motion for Sanctions and to Deem Plaintiff a Vexatious Litigant, and Denying Plaintiffs Countermotion for Sanctions Against Defendants</i>
08/22/2022	 Motion to Reconsider Filed By: Plaintiff Sheridan, Rene <i>[63] Plaintiff's Motion to Reconsider Order Granting in Part and Denying in Part Defendant's Motion to Dismiss</i>
08/22/2022	 Motion to Reconsider Filed By: Plaintiff Sheridan, Rene <i>[64] Plaintiff's Motion to Reconsider Order Granting Defendant's Motion for Sanctions and Denying Plaintiff's Counter Motion for Sanctions</i>
08/23/2022	 Clerk's Notice of Hearing <i>[65] Notice of Hearing</i>
08/31/2022	 Answer Filed By: Defendant Gutierrez, Joseph A, ESQ <i>[66] Defendants Answer and Affirmative Defenses</i>
09/06/2022	 Opposition to Motion Filed By: Defendant Gutierrez, Joseph A, ESQ <i>[67] Defendants Omnibus Opposition to Plaintiffs Motions for Reconsideration of Order Granting Defendants Motion to Dismiss and Order Granting in Part Defendants Motion for Sanctions.</i>
09/08/2022	 Amended Answer Filed By: Defendant Gutierrez, Joseph A, ESQ <i>[68] Defendants Amended Answer and Affirmative Defenses</i>

# CASE SUMMARY

CASE NO. A-21-838187-C

09/14/2022	 Motion to Strike Filed By: Defendant Gutierrez, Joseph A, ESQ; Defendant Maier Gutierrez & Associates; Defendant Knaus, Steven, ESQ; Defendant Maier, Jason, ESQ <i>[70] Defendants' Motion to Strike Plaintiff's Improper Subpoena Duces Tecum and Request for Sanctions</i>
09/14/2022	 Request for Exemption From Arbitration Filed by: Plaintiff Sheridan, Rene <i>[71] REQUEST FOR EXEMPTION FROM ARBITRATION</i>
09/14/2022	 Order Denying Motion <i>[72] Order Denying Plaintiff's Motions to Reconsider Orders (1) Granting in Part Denying in Part Defendants' Motion to Dismiss and (2) Granting Defendant's Motion for Sanctions and Denying Plaintiff's Counter-motion for Sanctions</i>
09/14/2022	 Reply to Opposition Filed by: Plaintiff Sheridan, Rene <i>[73] Plaintiff's Reply to Defendants' Opposition to Plaintiff's Motion for Reconsideration</i>
09/15/2022	 Undertaking for Security for Costs for Non-Resident <i>[74] Draft Only - Undertaking for Security for Costs for Non-Resident</i>
09/15/2022	 Clerk's Notice of Hearing <i>[75] Notice of Hearing</i>
09/15/2022	 Undertaking for Security for Costs for Non-Resident <i>[76] Undertaking for Security for Costs for Non-Resident - Draft Only</i>
09/19/2022	 Response Filed by: Defendant Gutierrez, Joseph A, ESQ; Defendant Maier Gutierrez & Associates; Defendant Knaus, Steven, ESQ; Defendant Maier, Jason, ESQ <i>[77] Defendants' Response to Plaintiff's Request for Exemption from Arbitration</i>
09/19/2022	 Undertaking for Security for Costs for Non-Resident <i>[78] Undertaking for Security for Costs for Non-Resident</i>
09/19/2022	 Undertaking for Security for Costs for Non-Resident <i>[79] Undertaking for Security for Costs for Non-Resident</i>
09/22/2022	 Demand for Jury Trial Filed By: Plaintiff Sheridan, Rene <i>[80] Demand for Jury Trial</i>
09/26/2022	 Reply Filed by: Plaintiff Sheridan, Rene <i>[81] Plaintiff's Reply To Defendants' Opposition To Plaintiff's Subpoena For Plaintiff's Enredacted Billing Statements</i>
09/28/2022	 Commissioners Decision on Request for Exemption - Granted <i>[82] Commissioner's Decision on Request for Exemption - GRANTED</i>
10/11/2022	 Reply in Support Filed By: Defendant Gutierrez, Joseph A, ESQ; Defendant Maier Gutierrez & Associates; Defendant Knaus, Steven, ESQ; Defendant Maier, Jason, ESQ

# CASE SUMMARY

CASE NO. A-21-838187-C

*[83] Defendants' Reply in Support of their Motion to Strike Plaintiff's Improper Subpoena Duces Tecum and Request for Sanctions*

10/11/2022



Notice

*[84] Department 22 Courtesy Copy & Appearance Instructions*

10/14/2022



Order

*[85] Order Re: Defendants Motion to Strike Plaintiff's Improper Subpoena Duces Tecum and Request for Sanctions*

10/25/2022



NRCP 16.1 Initial List of Witnesses and Documents

Filed By: Plaintiff Sheridan, Rene

*[86] Plaintiff's Initial Disclosure of Witnesses and Documents Pursuant to NRCP 16.1*

11/14/2022



Individual Case Conference Report

Filed By: Plaintiff Sheridan, Rene

*[87] Individual Case Conference Report*

11/15/2022



Individual Case Conference Report

Filed By: Defendant Gutierrez, Joseph A, ESQ; Defendant Maier Gutierrez & Associates; Defendant Knaus, Steven, ESQ; Defendant Maier, Jason, ESQ

*[88] Defendants Individual Case Conference Report*

11/15/2022



Mandatory Rule 16 Conference Order

*[89] Order Scheduling Mandatory Rule 16 Conference*

11/30/2022



Instructions for Bluejeans Conference

*[90] Instructions for BlueJeans Conference*

12/07/2022



Scheduling and Trial Order

*[91] Scheduling Order and Order Setting Civil Jury Trial*

12/19/2022



Answer

Filed By: Plaintiff Sheridan, Rene

*[92] Plaintiffs Answers to Defendants First Set of Request for Production of Documents to Rene Sheridan*

12/19/2022



Answer

Filed By: Plaintiff Sheridan, Rene

*[93] Plaintiffs Answers to Defendants First Set of Interrogatories to Plaintiff Rene Sheridan*

01/13/2023



Request

Filed by: Plaintiff Sheridan, Rene

*[94] PLAINTIFFS FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANT MAIER GUTIERREZ & ASSOCIATES*

02/24/2023



Subpoena Duces Tecum

Filed by: Plaintiff Sheridan, Rene

*[95] SUBPOENA DUCES TECUM*

02/24/2023



Subpoena Duces Tecum

Filed by: Plaintiff Sheridan, Rene

*[96] SUBPOENA DUCES TECUM*

# CASE SUMMARY

CASE NO. A-21-838187-C

05/22/2023	 Motion for Partial Summary Judgment Filed By: Plaintiff Sheridan, Rene <i>[97] Motion for Partial Summary Judgment</i>
05/23/2023	 Clerk's Notice of Hearing <i>[98] Notice of Hearing</i>
06/01/2023	 Notice Filed By: Plaintiff Sheridan, Rene <i>[99] NOTICE OF SUBPOENA DUCES TECUM PURSUANT TO NRCP 45</i>
06/01/2023	 Notice Filed By: Plaintiff Sheridan, Rene <i>[100] NOTICE OF SUBPOENA DUCES TECUM PURSUANT TO NRCP 45</i>
06/01/2023	 Notice Filed By: Plaintiff Sheridan, Rene <i>[101] NOTICE OF SUBPOENA DUCES TECUM PURSUANT TO NRCP 45</i>
06/01/2023	 Subpoena Duces Tecum Filed by: Plaintiff Sheridan, Rene <i>[103] SUBPOENA DUCES TECUM</i>
06/01/2023	 Subpoena Duces Tecum Filed by: Plaintiff Sheridan, Rene <i>[104] SUBPOENA DUCES TECUM</i>
06/01/2023	 Notice Filed By: Plaintiff Sheridan, Rene <i>[105] NOTICE OF SUBPOENA DUCES TECUM PURSUANT TO NRCP 45 AND SUBPOENA DUCES TECUM - CUSTODIAN OF RECORDS - ALLIED WORLD INSURANCE COMPANY</i>
06/01/2023	 Notice Filed By: Plaintiff Sheridan, Rene <i>[106] NOTICE OF SUBPOENA DUCES TECUM PURSUANT TO NRCP 45 AND SUBPOENA DUCES TECUM - GWENDOLYN HALL - CLARK COUNTY CLERKS</i>
06/01/2023	 Notice Filed By: Plaintiff Sheridan, Rene <i>[107] NOTICE OF SUBPOENA DUCES TECUM PURSUANT TO NRCP 45 AND SUBPOENA DUCES TECUM - KRISTEN T. GALLAGHER, ESQ. - MCDONALD CARANO</i>
06/05/2023	 Opposition to Motion For Summary Judgment Filed By: Defendant Gutierrez, Joseph A, ESQ; Defendant Maier Gutierrez & Associates; Defendant Knaus, Steven, ESQ; Defendant Maier, Jason, ESQ <i>[108] Defendants' Opposition to Plaintiff's Motion for Partial Summary Judgment</i>
06/14/2023	 Reply to Opposition Filed by: Plaintiff Sheridan, Rene <i>[109] Plaintiff's Reply To Defendant's Opposition To Plaintiff's Motion For Partial Summary Judgment</i>
06/20/2023	 Instructions for Bluejeans Conference <i>[110] Instructions for BlueJeans Conference</i>

# CASE SUMMARY













CASE NO. A-21-838187-C

06/26/2023	 Audiovisual Transmission Equipment Appearance Request <i>[111] Defendants' Notice of Intent to Appear by Simultaneous Audiovisual Transmission Equipment (BlueJeans)</i>
07/07/2023	 Affidavit of Service Filed By: Plaintiff Sheridan, Rene <i>[112] Affidavit of Service of Subpoena to Allied World Insurance Company</i>
07/10/2023	 Order Shortening Time <i>[113] Defendants Motion for Protective Order on Order Shortening Time</i>
07/10/2023	 Certificate of Service <i>[114] Certificate of Service</i>
07/10/2023	 Instructions for Bluejeans Conference <i>[115] Instructions for BlueJeans Conference</i>
07/10/2023	 Disclosure of Expert Filed By: Plaintiff Sheridan, Rene <i>[116] Plaintiff's Disclosure of Expert Witnesses</i>
07/10/2023	 Affidavit of Service Filed By: Plaintiff Sheridan, Rene <i>[117] Affidavit of Service of Subpoena to Custodian of Records, Clark County Clerk's Office - Gwendolyn Johnson Hall</i>
07/10/2023	 Affidavit of Service Filed By: Plaintiff Sheridan, Rene <i>[118] Affidavit of Service of Subpoena to Custodian of Records, McDonald Carano - Kristen T. Gallagher</i>
07/11/2023	 Opposition Filed By: Plaintiff Sheridan, Rene <i>[119] PLAINTIFFS OPPOSITION TO DEFENDANTS MOTION FOR PROTECTIVE ORDER</i>
07/12/2023	 Objection Filed By: Subpoena'd (Non) Party Allied World Insurance Company <i>[120] Non-Party Allied World Insurance Company's Objections to Subpoena Duces Tecum</i>
07/24/2023	 Order Denying Motion Filed By: Defendant Gutierrez, Joseph A, ESQ; Defendant Maier Gutierrez & Associates; Defendant Knaus, Steven, ESQ; Defendant Maier, Jason, ESQ <i>[121] Order Denying Plaintiff's Motion for Partial Summary Judgment</i>
07/24/2023	 Notice of Entry of Order <i>[122] Notice of Entry of Order Denying Plaintiff's Motion for Partial Summary Judgment</i>
07/31/2023	 Order Granting Motion <i>[123] Order Granting Defendants' Motion for Protective Order and to Strike Plaintiff's Subpoena to Allied World Insurance Company</i>
07/31/2023	 Notice of Entry of Order <i>[124] Notice of Entry of Order Granting Defendants' Motion for Protective Order and to</i>

# CASE SUMMARY

CASE NO. A-21-838187-C

*Strike Plaintiff's Subpoena to Allied World Insurance Company*

08/03/2023	 Motion to Reconsider Filed By: Plaintiff Sheridan, Rene <i>[125] Plaintiff's Motion to Reconsider Order Granting Defendant's Motion for A Protective Order</i>
08/07/2023	 Clerk's Notice of Hearing Party: Plaintiff Sheridan, Rene <i>[126] Notice of Hearing</i>
08/10/2023	 Disclaimer Filed By: Plaintiff Sheridan, Rene <i>[127] PLAINTIFF'S REBUTTAL RE: DEFENDANT'S STATEMENTS AND EXPERT WITNESS TESTIMONY</i>
08/17/2023	 Opposition to Motion Filed By: Defendant Gutierrez, Joseph A, ESQ; Defendant Maier Gutierrez & Associates; Defendant Knaus, Steven, ESQ; Defendant Maier, Jason, ESQ <i>[128] Defendants' Opposition to Plaintiff's Motion for Reconsideration of Order Granting Defendants' Motion for Protective Order</i>
08/18/2023	 Notice Filed By: Plaintiff Sheridan, Rene <i>[129] NOTICE OF SUBPOENA DUCES TECUM PURSUANT TO NRCP 45</i>
08/22/2023	 Motion for Summary Judgment Filed By: Defendant Gutierrez, Joseph A, ESQ; Defendant Maier Gutierrez & Associates; Defendant Knaus, Steven, ESQ; Defendant Maier, Jason, ESQ <i>[130] Defendants' Motion for Summary Judgment</i>
08/22/2023	 Appendix <i>[131] Appendix of Exhibits to Defendants' Motion for Summary Judgment (Volume I of II)</i>
08/22/2023	 Appendix <i>[132] Appendix of Exhibits to Defendants' Motion for Summary Judgment (Volume II of II)</i>
08/22/2023	 Reply to Opposition Filed by: Plaintiff Sheridan, Rene <i>[133] Plaintiff's Reply to Defendant's Opposition to Plaintiff's Motion for Reconsideration of Protective Order</i>
08/22/2023	 Clerk's Notice of Hearing Party: Defendant Gutierrez, Joseph A, ESQ <i>[134] Notice of Hearing</i>
08/25/2023	 Subpoena Electronically Issued Filed by: Plaintiff Sheridan, Rene <i>[135] Subpoena Duces Tecum for Business Records</i>
08/31/2023	 Affidavit of Service Filed By: Plaintiff Sheridan, Rene <i>[136] Affidavit of Service of Subpoena Duces Tecum for Business Records</i>
09/01/2023	

# CASE SUMMARY















CASE NO. A-21-838187-C

	 Certificate <i>[137] Certificate of Custodian of Records ( Exhibit "B")</i>
09/06/2023	 Notice of Deposition Filed By: Plaintiff Sheridan, Rene <i>[138] NOTICE OF TAKING DEPOSITION OF DEFENDANT STEPHEN G. KNAUSS</i>
09/07/2023	 Order Denying Motion <i>[139] Order Denying Plaintiff's Motion to Reconsider Order Granting Defendants' Motion for a Protective Order</i>
09/07/2023	 Notice of Entry of Order <i>[142] Notice of Entry of Order Denying Plaintiff's Motion to Reconsider Order Granting Defendants' Motion for a Protective Order</i>
09/07/2023	 Notice of Non Opposition <i>[143] Notice of Non-Opposition to Defendants' Motion for Summary Judgment</i>
09/07/2023	 Opposition to Motion For Summary Judgment Filed By: Plaintiff Sheridan, Rene <i>[144] PLAINTIFFS OPPOSITION TO DEFENDANTS MOTION FOR SUMMARY JUDGMENT</i>
09/21/2023	 Notice Filed By: Plaintiff Sheridan, Rene <i>[145] NOTICE OF TAKING DEPOSITION OF DEFENDANT JOSEPH A. GUTIERREZ</i>
09/26/2023	 Declaration Filed By: Plaintiff Sheridan, Rene <i>[146] Plaintiffs Declaration In Support Of Opposition To Defendants Motion For Summary Judgment</i>
09/28/2023	 Instructions for Bluejeans Conference <i>[147] Instructions for BlueJeans Conference</i>
09/28/2023	 Reply in Support <i>[148] Defendants' Reply in Support of Motion for Summary Judgment</i>
09/29/2023	 Order Shortening Time <i>[149] Defendants' Motion to Strike 1) Plaintiff's Untimely Opposition to Defendants' Motion for Summary Judgment; and 2) Improper Supplement to Initial Expert Disclosures on Order Shortening Time</i>
09/29/2023	 Opposition to Motion Filed By: Plaintiff Sheridan, Rene <i>[150] Plaintiffs Opposition to Defendants Motion to Strike and Response to Defendants Reply</i>
10/09/2023	 Notice <i>[151] AMENDED NOTICE OF TAKING DEPOSITION OF DEFENDANT JOSEPH A. GUTIERREZ</i>
10/09/2023	 Notice Filed By: Plaintiff Sheridan, Rene <i>[152] AMENDED NOTICE OF TAKING DEPOSITION OF DEFENDANT STEVEN G.</i>

# CASE SUMMARY

CASE NO. A-21-838187-C

KNAUSS

10/11/2023	 Instructions for Bluejeans Conference <i>[153] Instructions for BlueJeans Conference</i>
10/14/2023	 Order <i>[154] Order on Defendants' Motion to Strike 1) Plaintiff's Untimely Opposition to Defendants' Motion for Summary Judgment; and 2) Improper Supplement to Initial Expert Disclosures; and Defendants' Motion for Summary Judgment</i>
10/16/2023	 Notice of Entry of Order <i>[155] Notice of Entry of Order</i>
10/16/2023	 Motion to Compel Filed By: Plaintiff Sheridan, Rene <i>[156] Plaintiff's Motion to Compel Deposition of Defendant Steven Knauss Sanctions Requested</i>
10/17/2023	 Clerk's Notice of Hearing <i>[157] Notice of Hearing</i>
10/17/2023	 Clerk's Notice of Hearing <i>[158] Amended Notice of Hearing</i>
10/25/2023	 Motion Filed By: Plaintiff Sheridan, Rene <i>[159] Plaintiff's Motion to Alter or Amend Order Entered on October 14th, 2023</i>
10/26/2023	 Motion to Amend Filed By: Plaintiff Sheridan, Rene <i>[160] Plaintiff's Motion to Alter or Amend Order Entered on October 14th, 2023</i>
10/26/2023	 Motion for Partial Summary Judgment Filed By: Plaintiff Sheridan, Rene <i>[161] Motion for Partial Summary Judgment</i>
10/30/2023	 Clerk's Notice of Hearing <i>[162] Notice of Hearing</i>
10/30/2023	 Opposition to Motion to Compel <i>[163] Defendants' Opposition to Plaintiff's Motion to Compel Deposition of Defendant Steven Knauss</i>
10/30/2023	 Notice of Taking Deposition Filed By: Plaintiff Sheridan, Rene <i>[164] AMENDED NOTICE OF TAKING DEPOSITION OF DEFENDANT JOSEPH A GUTIERREZ</i>
11/08/2023	 Opposition to Motion <i>[165] Defendants' Opposition to Plaintiff's Motion to Alter or Amend Order Entered on October 14, 2023</i>
11/09/2023	 Opposition to Motion <i>[166] Defendants' Opposition to Plaintiff's Motion for Partial Summary Judgment</i>















# CASE SUMMARY

CASE NO. A-21-838187-C

11/09/2023	 Motion for Summary Judgment <i>[167] Defendants' Motion for Summary Judgment Based on Plaintiff's Failure to Provide Damages Computation, or Alternatively, for Rule 37 Sanctions - Hearing Requested</i>
11/13/2023	 Notice of Appearance <i>[168] Notice of Appearance of Counsel</i>
11/13/2023	 Reply in Support <i>[169] Reply in Support of Plaintiff's Motion to Compel Deposition of Defendant Steven Knaus</i>
11/13/2023	 Clerk's Notice of Hearing <i>[170] Notice of Hearing</i>
11/28/2023	 Instructions for Bluejeans Conference <i>[171] Instructions for BlueJeans Conference</i>
11/28/2023	 Opposition to Motion For Summary Judgment <i>[172] Plaintiffs Opposition to Defendants Motion for Summary Judgment Based on Plaintiffs Failure to Provide Damages Computation, or Alternatively, for Rule 37 Sanctions</i>
11/29/2023	 Discovery Commissioners Report and Recommendations <i>[173] Discovery Commissioners Report and Recommendations -Originals</i>
12/07/2023	 Reply in Support <i>[174] Defendants' Reply in Support of Motion for Summary Judgment Based on Plaintiff's Failure to Provide Damages Computation, or Alternatively, for Rule 37 Sanctions</i>
12/13/2023	 Instructions for Bluejeans Conference <i>[175] Instructions for BlueJeans Conference</i>
12/13/2023	 Reply <i>[176] Reply in Support of Plaintiff's Motion for Partial Summary Judgment</i>
12/15/2023	 Stipulation and Order <i>[177] Stipulation and Order to Extend Deadline for Filing Motions in Limine</i>
12/15/2023	 Order <i>[178] Order Re: Discovery Commissioner's Report and Recommendations</i>
12/15/2023	 Notice of Entry of Stipulation and Order <i>[179] Notice of Entry of Stipulation and Order to Extend Deadline for Filing Motions in Limine</i>
12/22/2023	 Motion in Limine Filed By: Defendant Gutierrez, Joseph A, ESQ; Defendant Maier Gutierrez & Associates; Defendant Knaus, Steven, ESQ; Defendant Maier, Jason, ESQ <i>[180] Defendants' Motion in Limine No. 1: to Exclude Reference to the Satisfaction of Judgment</i>
12/22/2023	 Motion in Limine Filed By: Defendant Gutierrez, Joseph A, ESQ; Defendant Maier Gutierrez & Associates; Defendant Knaus, Steven, ESQ; Defendant Maier, Jason, ESQ

# CASE SUMMARY

CASE NO. A-21-838187-C

	<i>[181] Defendants' Motion in Limine No. 2: to Preclude Steven Istock from Testifying as to Damages</i>
12/22/2023	 Motion in Limine Filed By: Defendant Gutierrez, Joseph A, ESQ; Defendant Maier Gutierrez & Associates; Defendant Knaus, Steven, ESQ; Defendant Maier, Jason, ESQ <i>[182] Defendants' Motion in Limine No. 3: to Preclude Damages Not Disclosed in Plaintiff's Rule 16.1 Disclosures</i>
12/26/2023	 Clerk's Notice of Hearing Party: Defendant Gutierrez, Joseph A, ESQ <i>[183] Notice of Hearing</i>
01/05/2024	 Pre-Trial Disclosure <i>[184] Defendants' Pretrial Disclosures</i>
01/08/2024	 Pre-Trial Disclosure <i>[185] Plaintiff's Pretrial Disclosures</i>
01/10/2024	 Instructions for Bluejeans Conference <i>[186] Instructions for BlueJeans Conference</i>
01/10/2024	 Opposition to Motion in Limine <i>[187] Combined Opposition to Defendants' Motions in Limine 1, 2, &amp; 3</i>
01/12/2024	 Order Denying Motion Filed By: Defendant Gutierrez, Joseph A, ESQ; Defendant Maier Gutierrez & Associates; Defendant Knaus, Steven, ESQ; Defendant Maier, Jason, ESQ <i>[188] Order Denying (1) Plaintiff's Motion to Alter or Amend Order; (2) Plaintiff's Motion for Partial Summary Judgment; (3) Defendant's Motion for Summary Judgment or Alternatively for Rule 37 Sanctions; and (4) Defendants' Motion for Summary Judgment Filed August 22, 2023</i>
01/15/2024	 Notice of Entry of Order <i>[189] Notice of Entry of Order</i>
01/16/2024	 Pre-Trial Disclosure <i>[190] Plaintiff's Amended Pre-trial Disclosures</i>
01/17/2024	 Amended Order Setting Jury Trial <i>[191] Amended Order Setting Civil Jury Trial</i>
01/23/2024	 Instructions for Bluejeans Conference <i>[192] Instructions for BlueJeans Conference</i>
01/23/2024	 Reply in Support <i>[193] Defendants' Omnibus Reply Brief in Support of Motions in Limine Nos. 1, 2, and 3</i>
01/23/2024	 Order <i>[194] Order Re: Defendants' Motions in Limine Nos. 1, 2 and 3</i>
01/23/2024	 Notice of Entry of Order <i>[195] Notice of Entry of Order Re: Defendants' Motions in Limine Nos. 1, 2 and 3</i>

# CASE SUMMARY

CASE NO. A-21-838187-C

01/24/2024	 Court Recorders Invoice for Transcript [196]
01/24/2024	 Recorders Transcript of Hearing [197] <i>Plaintiff's Motion for Summary Judgment December 14, 2023</i>
01/30/2024	 Order Shortening Time [198] <i>Defendant's Motion to Continue Trial on an Order Shortening Time</i>
02/01/2024	 Notice of Change of Hearing [199] <i>Notice of Change of Hearing</i>
02/08/2024	 Order Shortening Time [200] <i>Motion to Withdraw as Plaintiff's Counsel of Record and Order Shortening Time</i>
02/08/2024	 Notice of Non Opposition [201] <i>Notice of Non-Opposition to Defendant's Motion to Continue Trial on an Order Shortening Time</i>
02/08/2024	 Certificate of Mailing [202] <i>Certificate of Mailing</i>
02/09/2024	 Notice of Non Opposition Filed By: Defendant Gutierrez, Joseph A, ESQ; Defendant Maier Gutierrez & Associates; Defendant Knaus, Steven, ESQ; Defendant Maier, Jason, ESQ [203] <i>Notice of Non-Opposition to Plaintiff's Motion to Withdraw as Plaintiff's Counsel of Record and Order Shortening Time</i>
02/14/2024	 Notice [204] <i>Instructions for Zoom Conference</i>
02/15/2024	 Notice [205] <i>Instructions for Zoom Conference</i>
02/16/2024	 Notice of Appeal Filed By: Plaintiff Sheridan, Rene [206] <i>NOTICE OF APPEAL</i>
02/21/2024	 Case Appeal Statement <i>Case Appeal Statement</i>

## **DISPOSITIONS**

07/07/2022	<b>Clerk's Certificate</b> (Judicial Officer: Johnson, Susan) Debtors: Rene Sheridan (Plaintiff) Creditors: Joseph A Gutierrez, ESQ. (Defendant) Judgment: 07/07/2022, Docketed: 07/07/2022 Comment: Supreme Court No. 84818; Appeal Dismissed
08/15/2022	<b>Sanctions</b> (Judicial Officer: Johnson, Susan) Debtors: Rene Sheridan (Plaintiff) Creditors: Joseph A Gutierrez, ESQ. (Defendant) Judgment: 08/15/2022, Docketed: 08/16/2022
08/16/2022	<b>Order of Dismissal</b> (Judicial Officer: Johnson, Susan)

# CASE SUMMARY

CASE NO. A-21-838187-C


Debtors: Rene Sheridan (Plaintiff)  
Creditors: Joseph A Gutierrez, ESQ. (Defendant)  
Judgment: 08/16/2022, Docketed: 08/17/2022  
Comment: Certain Causes

08/17/2022

**Clerk's Certificate** (Judicial Officer: Johnson, Susan)  
Debtors: Rene Sheridan (Plaintiff)  
Creditors: Joseph A Gutierrez, ESQ. (Defendant)  
Judgment: 08/17/2022, Docketed: 08/18/2022  
Comment: Supreme Court No. 85003 Appeal Dismissed

## HEARINGS

08/16/2021


 **Minute Order** (3:00 AM) (Judicial Officer: Gonzalez, Elizabeth)

Minute Order - No Hearing Held;

Journal Entry Details:

*The Court notes plaintiff has filed a motion to continue. Pursuant to NRS 1.235(5) the Court can take no action on that motion and shall proceed no further with the matter until a decision is made on Plaintiffs motion for DQ. CLERK S NOTE: A copy of this minute order was distributed via Odyssey File and Serve. - vg/8/16/21;*

08/31/2021

 **Motion to Dismiss** (3:00 AM) (Judicial Officer: Gonzalez, Elizabeth)


*Defendant's Motion to Dismiss Pursuant to NRCP 12(b)(5)*

Minute Order - No Hearing Held;

Journal Entry Details:

*Pursuant to NRS 1.235(5) the Court can take no action on that motion and shall proceed no further with the matter until a decision is made on Plaintiffs motion for DQ. CLERK S NOTE: A copy of this minute order was distributed via Odyssey File and Serve. - vg/9/3/21;*

09/09/2021

 **Motion to Strike** (9:00 AM) (Judicial Officer: Hardcastle, Kathy)


*Plaintiff's Motion to Strike Defendant's Motion to Dismiss and Affidavit for Recusal of Judge Elizabeth Gonzalez*

Motion Denied;

Journal Entry Details:

*Court FOUND the present matter was previously filed and assigned to Judge Crockett as case No. A-20-813635-C. The latter Judge Crockett granted Defendant's Motion to Dismiss Without Prejudice. After the case was dismissed Plaintiff filed the in the Second Judicial District Court in Reno, NV. Plaintiff filed in the Second Judicial District Court to avoid further action from Judge Corckett. Defendants filed a motion to dismiss citing Judge Crockett's decision. The motion to dismissed was denied and Defendants filed a motion to change venue which was granted and the case was moved to the Eight Judicial District Court. Under the rules of the District Court when subsequent case is brought about involving the same parties and transactions in order to prevent judge or forum shopping the case is required to be reassigned to the department with the lowest case number. COURT ORDERED, case A-21-838187-C to be consolidated with A-20-813635-C and transferred to Department 24. COURT DENIED, Plaintiff's Affidavit of Prejudice since Judge Gonzalez had retired, matter is MOOT. Defendants pending motion to dismiss needs to be renoticed under A-20-813635-C if it is to be heard. Pending motion to strike needs to be renoticed under A-20-813635-C if it is to be heard. ;*

09/17/2021

 **Motion** (3:00 AM) (Judicial Officer: Hardcastle, Kathy)

*[11] Plaintiff's Ex Parte Motion for Continuance*

Off Calendar;

Journal Entry Details:

*The Motion for Continuance came before this Court on the September 17, 2021 Chamber Calendar. The Court has reviewed the Motion and the Limited Opposition. The Court previously reviewed the Motion for Continuance in Relation to the Hearing on September 9, 2021. The Court entered a Minute Order on September 9, 2021 transferring the case to Department 24 to be consolidated with A-20-813635-C. As such, this Department cannot take any further action on this motion. Therefore, COURT ORDERED matter OFF CALENDAR and Plaintiff to Re-notice the Motion if further action is needed. CLERK S NOTE: A copy of this minute order was distributed via Odyssey File and Serve. - vg/9/21/21;*

# CASE SUMMARY

CASE NO. A-21-838187-C

10/21/2021



**Minute Order** (12:00 PM) (Judicial Officer: Bixler, James)

Minute Order - No Hearing Held;

Journal Entry Details:

*The Court hereby corrects its minute orders of September 9, 2021 and September 17, 2021. The Minute Orders incorrectly identified the department handling the lower numbered case as Department 24. Case number A-20-813635-C, the lower numbered case into which this matter is consolidated was transferred to Department 8 as a result of Administrative Order 20-25 filed December 31, 2020, which reassigned all civil cases in Department 24 to Department 8. See AO-20-25, page 2:17-18. Therefore, the minute orders are hereby ORDERED CORRECTED to reflect the department assigned to this case instead of Department 24*  
**CLERK S NOTE:** Counsel are to ensure a copy of the forgoing minute order is distributed to all interested parties; additionally, a copy of the foregoing minute order was distributed to the registered service recipients via Odyssey eFileNV E-Service (10-21-2021 ks).;

11/16/2021

**CANCELED Motion to Strike** (9:00 AM) (Judicial Officer: Crockett, Jim)

*Vacated - Case Reassigned*

*Defendant's Motion to Strike Plaintiff's Notice of Default*

06/01/2022



**Minute Order** (3:00 AM) (Judicial Officer: Johnson, Susan)

Minute Order - No Hearing Held;

Journal Entry Details:

*Having noted Plaintiff filed a Motion and Affidavit for Recusal of Judge Susan Johnson on June 1, 2022, this Court ORDERS the hearings concerning Plaintiff's Motion to Strike Defendants Motion to Dismiss and Defendants Motion to Dismiss scheduled to be heard Thursday, June 2, 2022 at 9:00 a.m. to be VACATED. CLERK'S NOTE: The above minute order has been distributed to all parties by the Court Clerk via electronic service and/or mail. nc// 6/1/2022;*

06/02/2022

**CANCELED Motion to Dismiss** (9:00 AM) (Judicial Officer: Johnson, Susan)

*Vacated*

*Defendant's Motion to Dismiss*

*05/17/2022*

*Continued to 06/02/2022 - Stipulation and Order - Sheridan, Rene; Gutierrez, Joseph A, ESQ*

06/02/2022

**CANCELED Motion to Strike** (9:00 AM) (Judicial Officer: Johnson, Susan)

*Vacated*

*Plaintiff's Motion to Strike Defendant's Motion to Dismiss*

*05/17/2022*

*Continued to 06/02/2022 - Stipulation and Order - Sheridan, Rene; Gutierrez, Joseph A, ESQ*

06/30/2022

**CANCELED Motion** (10:30 AM) (Judicial Officer: Bell, Linda Marie)

*Vacated*

*Plaintiff's Motion and Affidavit for Recusal of Judge Susan Johnson*

08/04/2022

**Motion to Dismiss** (9:00 AM) (Judicial Officer: Johnson, Susan)

*Defendant's Motion to Dismiss*

*Granted in Part;*

08/04/2022

**Motion to Strike** (9:00 AM) (Judicial Officer: Johnson, Susan)

*Plaintiff's Motion to Strike Defendant's Motion to Dismiss*

*Denied;*

08/04/2022



**All Pending Motions** (9:00 AM) (Judicial Officer: Johnson, Susan)

Matter Heard;




Journal Entry Details:

**DEFENDANT'S MOTION TO DISMISS...PLAINTIFF'S MOTION TO STRIKE**  
**DEFENDANT'S MOTION TO DISMISS** As to Plaintiff's Motion to Strike, arguments by counsel. Ms. Sheridan stated she had 5 causes of action. Mr. Wong advised they were not denying a contractual relationship. Court STATED ITS FINDINGS and ORDERED, Motion DENIED. As to Defendant's Motion to Dismiss, arguments by counsel. Upon Court's inquiry,

# CASE SUMMARY

CASE NO. A-21-838187-C

Mr. Wong was not sure if a Satisfaction of Judgment had been filed. COURT FURTHER ORDERED, Motion GRANTED IN PART as to Claim #2, breach of contract, quasi contract, and Claim #4, breach of implied covenant of good faith and fair dealing, which was all within the professional negligence claim and DENIED IN PART as to the negligence claim and DISMISSED the prayer for punitive damages, as punitive damages are not awarded for negligence, breach of contract, quasi contract and breach of implied covenant of good faith and fair dealing claims. Court FINDS there was no claim for fraud as that was dismissed by the Second District Court and Plaintiff had failed to provide facts to indicate the failing to file a Judgment of Satisfaction was fraudulent. Court advised Ms. Sheridan she would need an expert witness, who was a lawyer, to testify on her behalf as to professional negligence. COURT FURTHER ORDERED, the first cause of action would REMAIN. Ms. Sheridan requested leave to amend the Complaint. Court advised it would not grant Ms Sheridan's oral request for leave to amend and directed her to file the appropriate pleading with the proposed amendment. Court directed Mr. Wong to prepare the order and speak to his clients regarding the filing of a Satisfaction of Judgment.;

- |            |   |
|------------|---|
| 09/27/2022 | <p><b>CANCELED Motion to Reconsider</b> (8:30 AM) (Judicial Officer: Johnson, Susan)</p> <p><i>Vacated - per Order</i></p> <p><i>Plaintiff's Motion to Reconsider Order Granting in Part and Denying in Part Defendant's Motion to Dismiss</i></p>  |
| 09/27/2022 | <p><b>CANCELED Motion to Reconsider</b> (8:30 AM) (Judicial Officer: Johnson, Susan)</p> <p><i>Vacated - per Order</i></p> <p><i>Plaintiff's Motion to Reconsider Order Granting Defendant's Motion for Sanctions and Denying Plaintiff's Counter Motion for Sanctions</i></p>  |
| 10/18/2022 | <p><b>CANCELED Motion to Strike</b> (8:30 AM) (Judicial Officer: Johnson, Susan)</p> <p><i>Vacated</i></p> <p><i>Defendants' Motion to Strike Plaintiff's Improper Subpoena Duces Tecum and Request for Sanctions</i></p>   |
| 12/07/2022 | <p> <b>Mandatory Rule 16 Conference</b> (8:30 AM) (Judicial Officer: Johnson, Susan)</p> <p>Matter Heard;</p> <p>Journal Entry Details:</p> <p><i>Counsel anticipated 3-5 days to try. Colloquy on close of discovery date. Court reviewed the following due dates set forth in the Joint Case Conference Report: Close of discovery: 10/11/2023, Motions to amend: 7/13/2023, Expert disclosures - initial: 7/13/2023, Expert disclosures - rebuttal: 8/11/2023, Dispositive motions: 11/9/2023. COURT ORDERED, trial dates SET; advised it would send out a Trial Scheduling Order. Court advised the judicial settlement conference program was available through Department 30 and that counsel could contact the Department's Judicial Executive Assistant, Angela McBride (McBrideA@clarkcountycourts.us), if interested; further advised it could be done either in-house or remotely. Ms. Sheridan stated she has requested Mr. Garin to provide an unredacted billing statements. Court advise Ms. Sheridan that discovery begins and she can make her request in writing to Mr. Garin. Mr. Garin has 30 days to reply and provide whatever documents she has requested. 10/18/2023 - 8:30 AM - STATUS CHECK: TRIAL READINESS 1/24/2024 - 8:30 AM - PRETRIAL CONFERENCE/CALENDAR CALL 2/5/2024 - 8:30 AM - JURY TRIAL ;</i></p> |
| 06/27/2023 | <p> <b>Motion for Partial Summary Judgment</b> (8:30 AM) (Judicial Officer: Johnson, Susan)</p> <p><i>Plaintiff's Motion for Partial Summary Judgment</i></p> <p>Denied Without Prejudice;</p> <p>Journal Entry Details:</p> <p><i>Arguments by counsel and Ms. Sheridan. COURT ORDERED, motion DENIED WITHOUT PREJUDICE. COURT FURTHER ORDERED, Defendant's request for attorney fees and costs DENIED. Mr. Wong to prepare the Order.;</i></p>   |
| 07/13/2023 | <p> <b>Motion for Protective Order</b> (9:00 AM) (Judicial Officer: Johnson, Susan)</p> <p><i>Defendants' Motion for Protective Order on Order Shortening Time</i></p> <p>Motion Granted;</p> <p>Journal Entry Details:</p> <p><i>Arguments by Plaintiff regarding using previous malpractice cases for trial. Mr. Wong</i></p>  |

# CASE SUMMARY

CASE NO. A-21-838187-C

indicated the Plaintiff has served subpoenas, filed a Notice of Intent, and Plaintiff received policy regarding coverage. COURT ORDERED, subpoenas are hereby STRICKEN, and Motion is GRANTED. Plaintiff is not allowed to bring in every malpractice case regarding the same hospital, Plaintiff is only allowed to bring in evidence of what harm was done to Plaintiff. Mr. Wong to prepare the Order.;

08/29/2023



**Minute Order** (3:00 AM) (Judicial Officer: Johnson, Susan)

Minute Order - No Hearing Held;

Journal Entry Details:

*Having examined Plaintiff's Motion to Reconsider Order Granting Defendant's Motion for a Protective Order filed August 3, 2023 in preparation for the hearing scheduled Thursday, September 7, 2023 at 9:00 a.m., noted Plaintiff did not seek leave of this Court to rehear the Motion for Protective Order pursuant to Rule 2.24(a) of the Eighth Judicial District Court Rules (EDCR) and Rule 13(7) of the District Court Rules (DCR), and did not provide a basis for the matter to be reconsidered and there is good cause therefore, COURT ORDERS Plaintiff's Motion to Reconsider Order Granting Defendant's Motion for a Protective Order filed August 3, 2023 is DENIED. The matter scheduled to be heard Thursday, September 7, 2023 at 9:00 a.m. is VACATED pursuant to EDCR 2.23. Defendant's request for reimbursement of attorney's fees and costs incurred in defending the motion is DENIED without prejudice. Defense counsel is to prepare and submit a proposed Order to the Court within fourteen (14) days of this Minute Order or no later than Tuesday, September 12, 2023 pursuant to EDCR 7.21. CLERK'S NOTE: The above minute order has been distributed to all parties by the Court Clerk via electronic service and/or mail. nc// 8/29/2023;*

08/30/2023

**CANCELED Minute Order** (3:00 AM) (Judicial Officer: Johnson, Susan)

*Vacated - Set in Error*

09/07/2023

**CANCELED Motion to Reconsider** (9:00 AM) (Judicial Officer: Johnson, Susan)

*Vacated*

*Plaintiff's Motion to Reconsider Order Granting Defendant's Motion for A Protective Order*

10/05/2023

**Motion for Summary Judgment** (9:00 AM) (Judicial Officer: Johnson, Susan)

**10/05/2023, 12/14/2023**

Matter Continued;

10/05/2023

**Motion to Strike** (9:00 AM) (Judicial Officer: Johnson, Susan)

*Defendants' Motion to Strike 1) Plaintiff's Untimely Opposition to Defendants' Motion for Summary Judgment; and 2) Improper Supplement to Initial Expert Disclosures on Order Shortening Time*

Granted in Part;

10/05/2023



**All Pending Motions** (9:00 AM) (Judicial Officer: Johnson, Susan)

Matter Heard;

Journal Entry Details:

*DEFENDANT'S MOTION TO STRIKE (1) PLAINTIFF'S UNTIMELY OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT; AND (2) IMPROPER SUPPLEMENT TO INITIAL EXPERT DISCLOSURES ON ORDER SHORTENING TIME... DEFENDANTS' MOTION FOR SUMMARY JUDGMENT Upon Court's inquiry, Mr. Wong argued Ms. Sheridan's Opposition to Defendant's Motion for Summary Judgment ("MSJ") was untimely, there was no excusable neglect or good cause for the delay and the Court had authority to grant the Motion as unopposed. Mr. Wong further argued Plaintiff's supplemental expert report was improper considering the purpose of the report was to rebut arguments in Defendant's MSJ. Ms. Sheridan elaborated on misleading information which resulted in her late opposition and argued, as a pro se litigant, she was entitled to some leeway. Following further arguments, Court stated its Findings and ORDERED Motion to Strike DENIED as to untimely Opposition and GRANTED as to Improper Supplement to Initial Expert Disclosures. COURT DIRECTED Mr. Wong to prepare the Order with detailed Findings of Fact and Conclusions of Law, circulate to opposing party, and submit to the Court pursuant to EDCR 7.21 and the current Administrative Orders. Court INQUIRED into Rule 56 (d) request for continuance and discovery deadline. Mr. Wong argued Plaintiff's declaration was insufficient considering it did not address what information would be sought to defeat the Motion for Summary Judgment. Upon Court's inquiry, Ms. Sheridan elaborated on the outstanding information needed to combat Defendant's Motion for Summary Judgment and noted the*

**CASE SUMMARY****CASE NO. A-21-838187-C**

*discovery deadline had yet to expire. Colloquy regarding Mr. Gutierrez, Mr. Knaus and Ms. Sheridan's outstanding depositions. Court stated its Findings and ORDERED Defendant's Motion for Summary Judgment CONTINUED to allow Plaintiff time to complete discovery before October 11, 2023 and to take Mr. Gutierrez's deposition. Court FURTHER GRANTED an audiovisual deposition of Ms. Sheridan with the perimeters outlined in Open Court.;*

10/18/2023

**Status Check: Trial Readiness (8:30 AM)** (Judicial Officer: Johnson, Susan)

Matter Heard;

Journal Entry Details:

*Court stated the matter is set for a jury trial and is number three on the trial stack. Upon inquiry of the Court regarding trial readiness, Ms. Sheridan stated she is not ready. Ms. Sheridan further stated a Motion to Compel is set before the Discovery Commissioner for November 17; advised there are issues that would need to be address and effect the trial date. Court stated it will not continue deadlines until the Discovery Commissioner issues their decision. Ms. Sheridan requested Defendant's Motion for Summary Judgment to be rescheduled pending the Motion to Compel to be heard. Mr. Wong stated he has no objection to rescheduling the Motion for Summary Judgment if Ms. Sheridan agreed to rescheduling Mr. Gutierrez's deposition. Following colloquy regarding depositions, COURT ORDERED, Motion for Summary Judgment RESET. Court DIRECTED counsel and Ms. Sheridan to discuss new dates for Mr. Gutierrez's deposition date; advised the deposition should take place after Mr. Gutierrez's trial when he is available. 12/12/2023 8:30 AM DEFENDANT'S MOTION FOR SUMMARY JUDGMENT;*

11/17/2023

**Motion to Compel (9:30 AM)** (Judicial Officer: Ganz, Adam)*Plaintiff's Motion to Compel Deposition of Defendant Steven Knauss Sanctions Requested***MINUTES**

Email Rcvd. 10-17-2023 From Discovery Clerk N. Simonetti

Granted;

Journal Entry Details:

*Argument by counsel. Commissioner noted a notary needs to be present with the deponent. COMMISSIONER RECOMMENDED, Plaintiff's Motion to Compel Deposition of Defendant Steven Knauss Sanctions Request GRANTED IN PART/DENIED IN PART. Motion GRANTED as to the Deposition and DENIED as to the Request for Sanctions. Commissioner further noted he found good cause and excusable neglect. Commissioner stated he would like the Deposition at issue to take place on the same date as Mr. Gutierrez Deposition. COMMISSIONER FURTHER RECOMMENDED, the fourteen-day notice for the Deposition is WAIVED. Commissioner directed Plaintiff to re-notice the Deposition. Mr. Mushkin to prepare the Report and Recommendations, and Mr. Wong to approve as to form and content. Comply with Administrative Order 20-10, and submit the DCRR to DiscoveryInbox@clarkcountycourts.us. A proper report must be timely submitted within fourteen days of the hearing. Otherwise, counsel will pay a contribution. COMMISSIONER RECOMMENDED, Status Check SET; if the DCRR is submitted, the Discovery office will vacate the Status Check. 12/15/2023 9:15 AM STATUS CHECK: COMPLIANCE 11/17/2023 DCRR (MR. MUSHKIN);*

**SCHEDULED HEARINGS**

**CANCELED Status Check: Compliance (12/15/2023 at 9:15 AM)** (Judicial Officer: Ganz, Adam)

*Vacated**Status Check: Compliance 11/17/2023 DCRR (Mr. Mushkin)*

12/14/2023

**Motion to Amend (9:00 AM)** (Judicial Officer: Johnson, Susan)

Events: 10/26/2023 Motion to Amend

*Plaintiff's Motion to Alter or Amend Order Entered on October 14th, 2023*

Denied;

12/14/2023

**Motion for Partial Summary Judgment (9:00 AM)** (Judicial Officer: Johnson, Susan)

Events: 10/26/2023 Motion for Partial Summary Judgment

*Plaintiff's Motion for Partial Summary Judgment*



Denied;

12/14/2023

**Motion for Summary Judgment (9:00 AM)** (Judicial Officer: Johnson, Susan)*Defendants' Motion for Summary Judgment Based on Plaintiff's Failure to Provide Damages*

# CASE SUMMARY

CASE NO. A-21-838187-C

	<p><i>Computation, or Alternatively, for Rule 37 Sanctions</i></p> <p>Denied;</p> <p>Journal Entry Details:</p> <p>;</p>
12/14/2023	<p> <b>All Pending Motions</b> (9:00 AM) (Judicial Officer: Johnson, Susan)</p> <p>Matter Heard;</p> <p>Journal Entry Details:</p> <p><i>PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT Arguments by counsel regarding Motion. COURT ORDERED, Motion DENIED. Court noted these are issues that need to go to the jury. MOTION FOR SUMMARY JUDGMENT Arguments by counsel regarding Motion. COURT ORDERED, Motion DENIED. PLAINTIFF'S MOTION TO ALTER OR AMEND ORDER ENTERED ON October 14TH, 2003 Court noted it is inclined to deny this as the order reflected exactly as ordered in court. COURT ORDERED, Motion DENIED. DEFENDANTS' MOTION FOR SUMMARY JUDGMENT BASED ON PLAINTIFF S FAILURE TO PROVIDE DAMAGES COMPUTATION, OR ALTERNATIVELY, FOR RULE 37 SANCTIONS Arguments by counsel regarding Motion. COURT ORDERED, Motion DENIED.</i></p> <p>;</p>
12/15/2023	<p><b>CANCELED Status Check: Compliance</b> (9:15 AM) (Judicial Officer: Ganz, Adam)</p> <p><i>Vacated</i></p> <p><i>Status Check: Compliance 11/17/2023 DCRR (Mr. Mushkin)</i></p>
01/17/2024	<p> <b>Pretrial/Calendar Call</b> (8:30 AM) (Judicial Officer: Johnson, Susan)</p> <p>Matter Heard;</p> <p>Journal Entry Details:</p> <p><i>Court noted this case is number two on the stack. Mr. Wong inquired they are not prepared for trial as he is doing a Writ Petition with client, waiting on transcript from December, speaking with insurance carrier about settlement offer, and need to speak with opposing counsel about settlement. Mr. Mushkin agreed there has been discussion about a settlement conference. COURT ORDERED, trial is VACATED and RESET. A new scheduling order will be issued. 02/28/24 8:30 AM CALENDAR CALL 03/11/24 8:30 AM JURY TRIAL ;</i></p>
01/30/2024	<p><b>CANCELED Motion in Limine</b> (10:30 AM) (Judicial Officer: Johnson, Susan)</p> <p><i>Vacated - Previously Decided</i></p> <p><i>Defendants' Motion in Limine No. 1: to Exclude Reference to the Satisfaction of Judgment</i></p>
01/30/2024	<p><b>CANCELED Motion in Limine</b> (10:30 AM) (Judicial Officer: Johnson, Susan)</p> <p><i>Vacated - Previously Decided</i></p> <p><i>Defendants' Motion in Limine No. 2: to Preclude Steven Istock from Testifying as to Damages</i></p>
01/30/2024	<p><b>CANCELED Motion in Limine</b> (10:30 AM) (Judicial Officer: Johnson, Susan)</p> <p><i>Vacated - Previously Decided</i></p> <p><i>Defendants' Motion in Limine No. 3: to Preclude Damages Not Disclosed in Plaintiff's Rule 16.1 Disclosures</i></p>
02/05/2024	<p><b>CANCELED Jury Trial</b> (8:30 AM) (Judicial Officer: Johnson, Susan)</p> <p><i>Vacated - per Judge</i></p>
02/21/2024	<p><b>Pretrial/Calendar Call</b> (8:30 AM) (Judicial Officer: Johnson, Susan)</p>
02/21/2024	<p><b>Motion to Continue Trial</b> (8:30 AM) (Judicial Officer: Johnson, Susan)</p> <p><i>Defendant's Motion to Continue Trial on an Order Shortening Time</i></p>
02/21/2024	<p><b>Motion</b> (8:30 AM) (Judicial Officer: Johnson, Susan)</p> <p><i>Motion to Withdraw as Plaintiff's Counsel of Record and Order Shortening Time</i></p>
03/11/2024	<p><b>CANCELED Jury Trial</b> (8:30 AM) (Judicial Officer: Johnson, Susan)</p> <p><i>Vacated</i></p>
07/17/2024	<p><b>Pretrial/Calendar Call</b> (8:30 AM) (Judicial Officer: Johnson, Susan)</p>

# CASE SUMMARY

CASE NO. A-21-838187-C

07/29/2024	Jury Trial (8:30 AM) (Judicial Officer: Johnson, Susan)	
DATE	FINANCIAL INFORMATION	

<b>Defendant</b> Gutierrez, Joseph A, ESQ	
Total Charges	818.80
Total Payments and Credits	818.80
<b>Balance Due as of 2/21/2024</b>	<b>0.00</b>
<b>Defendant</b> Maier Gutierrez & Associates	
Total Charges	400.00
Total Payments and Credits	400.00
<b>Balance Due as of 2/21/2024</b>	<b>0.00</b>
<b>Plaintiff</b> Sheridan, Rene	
Total Charges	424.00
Total Payments and Credits	224.00
<b>Balance Due as of 2/21/2024</b>	<b>200.00</b>

## DISTRICT COURT CIVIL COVER SHEET

XI

County, Nevada

Case No. \_\_\_\_\_  
(Assigned by Clerk's Office)**I. Party Information** (provide both home and mailing addresses if different)

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

Rene Sheridan

# 1394

# 14466

Attorney (name/address/phone):

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

Joseph A Gutierrez

# 6653

# 13621

Attorney (name/address/phone):

**II. Nature of Controversy** (please select the one most applicable filing type below)**Civil Case Filing Types**

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

Business Court filings should be filed using the Business Court civil coversheet.

7/20/21

Date

Prepared by the Clerk

Signature of initiating party or representative

See other side for family-related case filings.

1 **ORDR**

2 **DISTRICT COURT**

3 **CLARK COUNTY, NEVADA**

4 **RENE SHERIDAN, an individual,**

**Case No. A-21-838187-C**

5 **Plaintiff,**

**Dept. No. XXII**

6 **Vs.**

7  
8 **JOSEPH A. GUTIERREZ, an individual;**  
9 **STEVEN G. KNAUSS, an individual;**  
10 **JASON H. MAIER, an individual; MAIER**  
11 **GUTIERREZ & ASSOCIATES, a**  
12 **Domestic Professional LLC; and DOES I-**  
13 **XX, inclusive; and XYZ**  
14 **CORPORATIONS I-XX, inclusive,**

15 **Defendants.**

16 **ORDER RE: DEFENDANTS' MOTIONS IN LIMINE NOS. 1, 2 AND 3**

17 These matters concerning the Motions in Limine Nos. 1, 2 and 3 filed by Defendants

18 JOSEPH A. GUTIERREZ, STEVEN G. KNAUSS, JASON H. MAIER and MAIER GUTIERREZ

19 & ASSOCIATES to:

- 20 1. Exclude Reference to the Satisfaction of Judgment;
- 21 2. Preclude Steven Istock from Testifying as to Damages; and
- 22 3. Preclude Damages Not Disclosed in Plaintiff's Rule 16.1 Disclosures,

23 all filed December 22, 2023 came, *in chambers*, to the attention of Department XXII of the Eighth

24 Judicial District Court, in and for Clark County, Nevada, with JUDGE SUSAN JOHNSON

25 presiding, in preparation for the January 30, 2024 hearing. Having reviewed the papers and

26 pleadings on file herein including Defendants' Motions and Plaintiff's Opposition thereto, and

27 ...

1 finding it unnecessary to hear oral argument, this Court decides the Motions in Limine, and orders as  
2 follows:

3 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED** Defendants' Motion in  
4 Limine No. 1: to Exclude Reference to the Satisfaction of Judgment filed December 22, 2023 is  
5 granted for at least a few reasons: *First*, while the Defendants' Judgment filed against MS.  
6 SHERIDAN is addressed in Paragraph 41 of the Complaint filed August 31, 2020, the fact the  
7 Judgment ultimately was satisfied is not alleged at all within the initial pleading—perhaps as it had  
8 not been satisfied at that point. It follows then, as the Satisfaction of Judgment was not addressed,  
9 the issues relating to causation of damages (if any) resulting from the Notice of Satisfaction of  
10 Judgment not being filed until January 24, 2022 also were not alleged. *Second*, if she believed she  
11 had sustained damages caused by the January 24, 2022 filing of the Notice of Satisfaction of  
12 Judgment, MS. SHERIDAN could have moved this Court to amend her pleading which she did not  
13 do. *Third*, MS. SHERIDAN did not demand a signed Satisfaction of Judgment be provided by  
14 Defendants when the Judgment was satisfied. Further, as fees necessarily are involved to file a  
15 Satisfaction of Judgment with the Court and to record such in the County's Recorder's Office, this  
16 Court finds it was incumbent upon MS. SHERIDAN—the party who would benefit from such a  
17 filing/recording—to do so.

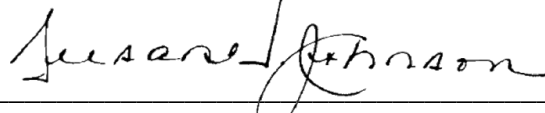
18 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** this Court's ruling  
19 concerning Defendants' Motion in Limine No. 2: to Preclude Steven Istock from Testifying as to  
20 Damages filed December 22, 2023 shall be deferred to the time of trial. With that said, this Court is  
21 mindful, to testify as an expert witness under NRS 50.275, (1) MR. ISTOCK must be qualified in an  
22 area of “scientific, technical or other specialized knowledge” (the qualification requirement); (2) his  
23 specialized knowledge must “assist the trier of fact to understand the evidence or to determine a fact  
24 in issue” (the assistance requirement); and (3) his testimony must be limited “to matters within the  
25  
26  
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28

1 scope of his specialized knowledge (the limited scope requirement). *See* Hallmark v. Eldridge, 124  
2 Nev. 492, 498, 189 P.3d 646 (2008).

3 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** this Court shall defer its  
4 ruling regarding Defendants’ Motion in Limine No. 3: to Preclude Damages Not Disclosed in  
5 Plaintiff’s Rule 16.1 Disclosures filed December 22, 2023 to the time of trial. With that said,  
6 damages must be substantiated by the evidence presented at trial. Further, at the outset, MS.  
7 SHERIDAN must have provided “a computation of each category of damages claimed by the  
8 disclosing party—who must make available for inspection and copying as under [NRCP] 34 the  
9 documents or other evidentiary material, unless privileged or protected from disclosure, on which  
10 each computation is based, including materials bearing on the nature and extent of injuries  
11 suffered...” *See* NRCP 16.1(a)(1)(A)(iv).  
12

13 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, as this Court has decided  
14 the issues presented within Defendants’ Motions in Limine Nos. 1, 2 and 3, the matters scheduled to  
15 be heard on Tuesday, January 30, 2024 are vacated pursuant to Rule 2.23 of the Eighth Judicial  
16 District Court Rules (EDCR).  
17

18 **Dated this 23rd day of January, 2024**

19 

20 SUSAN H. JOHNSON, DISTRICT COURT JUDGE

21 **D37 1C1 143D ED40**  
22 **Susan Johnson**  
23 **District Court Judge**  
24  
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26  
27  
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1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Rene Sheridan, Plaintiff(s)

CASE NO: A-21-838187-C

7 vs.

DEPT. NO. Department 22

8 Joseph Gutierrez, ESQ,  
9 Defendant(s)

10  
11 **AUTOMATED CERTIFICATE OF SERVICE**

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

Service Date: 1/23/2024

15 Charity Johnson

cmj@mgalaw.com

16 Jason Maier

jrm@mgalaw.com

17 Joseph Gutierrez

jag@mgalaw.com

18 Karen Foley

kfoley@mccnvlaw.com

19 Michael Mushkin

michael@mccnvlaw.com

20 Joseph Garin

jgarin@lipsonneilson.com

21 Jonathan Wong

jwong@lipsonneilson.com

22 RENE SHERIDAN

RSHERIDAN34@AOL.COM

23 PATRICK CANNON

HOTOPIX@GMAIL.COM

24 Cristiana Lopez

clopez@mccnvlaw.com

25 Michele Stones

mstones@lipsonneilson.com

26  
27  
28

1 Suzanne Zaranti

szaranti@mccnvlaw.com

2  
3 If indicated below, a copy of the above mentioned filings were also served by mail  
4 via United States Postal Service, postage prepaid, to the parties listed below at their last  
5 known addresses on 1/24/2024

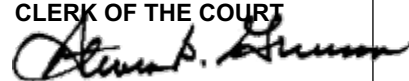
6 Kenneth Webster

Hall Prangle & Schoonveld, LLC

Attn: Kenneth Webster, Esq

1140 North Town Center Drive, Suite 350

Las Vegas, NV, 89144  
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**NEOJ**

LIPSON NEILSON P.C.  
 JOSEPH P. GARIN, ESQ.  
 Nevada Bar No. 6653  
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*Attorneys for Defendants*

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

\* \* \*

RENE SHERIDAN, an individual

Plaintiff,

vs.

JOSEPH A. GUTIERREZ, Esq.  
 STEVEN G. KNAUSS, Esq.  
 JASON R. MAIER, Esq.  
 MAIER GUTIERREZ & ASSOCIATES

Defendants.

) Case No: A-21-838187-C  
 ) Dept. No.: 22

) **NOTICE OF ENTRY OF ORDER RE:**  
 ) **DEFENDANTS' MOTIONS IN LIMINE**  
 ) **NOS. 1, 2 AND 3**

**PLEASE TAKE NOTICE** that an Order Re: Defendants' Motions in Limine Nos. 1, 2  
 and 3 was entered by the Court on January 23, 2024, a copy of which is attached hereto.

DATED this 23<sup>rd</sup> day of January, 2024.

LIPSON NEILSON P.C.

By: /s/ Jonathan K. Wong

JOSEPH P. GARIN, ESQ. (Nv Bar No. 6653)  
 JONATHAN K. WONG, ESQ. (NV Bar No. 13621)  
 9900 Covington Cross Drive, Suite 120  
 Las Vegas, Nevada 89144

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b) and Administrative Order 14-2, I certify that on the 23<sup>rd</sup> day of January, 2024, I electronically served the foregoing **NOTICE OF ENTRY OF ORDER RE: DEFENDANTS' MOTIONS IN LIMINE NOS. 1, 2 AND 3** to the following parties utilizing the Court's E-File/ServeNV System:

Michael R. Mushkin, Esq. L. Joe Coppedge, Esq. MUSHKIN & COPPEDGE 6070 S. Eastern Avenue, Suite 270 Las Vegas, Nevada 89119 <a href="mailto:michael@mushlaw.com">michael@mushlaw.com</a> <a href="mailto:lcoppedge@mccnvlaw.com">lcoppedge@mccnvlaw.com</a>	
---	--

*Attorneys for Plaintiff*

/s/ Michele Stones  
An Employee of LIPSON NEILSON P.C.

1 **ORDR**

2 **DISTRICT COURT**

3 **CLARK COUNTY, NEVADA**

4  
5 **RENE SHERIDAN, an individual,**  
6 **Plaintiff,**

**Case No. A-21-838187-C**  
**Dept. No. XXII**

7 **Vs.**

8 **JOSEPH A. GUTIERREZ, an individual;**  
9 **STEVEN G. KNAUSS, an individual;**  
10 **JASON H. MAIER, an individual; MAIER**  
11 **GUTIERREZ & ASSOCIATES, a**  
12 **Domestic Professional LLC; and DOES I-**  
13 **XX, inclusive; and XYZ**  
14 **CORPORATIONS I-XX, inclusive,**  
15 **Defendants.**

16 **ORDER RE: DEFENDANTS' MOTIONS IN LIMINE NOS. 1, 2 AND 3**

17 These matters concerning the Motions in Limine Nos. 1, 2 and 3 filed by Defendants  
18 JOSEPH A. GUTIERREZ, STEVEN G. KNAUSS, JASON H. MAIER and MAIER GUTIERREZ  
19 & ASSOCIATES to:

- 20 1. Exclude Reference to the Satisfaction of Judgment;
- 21 2. Preclude Steven Istock from Testifying as to Damages; and
- 22 3. Preclude Damages Not Disclosed in Plaintiff's Rule 16.1 Disclosures,

23 all filed December 22, 2023 came, *in chambers*, to the attention of Department XXII of the Eighth  
24 Judicial District Court, in and for Clark County, Nevada, with JUDGE SUSAN JOHNSON  
25 presiding, in preparation for the January 30, 2024 hearing. Having reviewed the papers and  
26 pleadings on file herein including Defendants' Motions and Plaintiff's Opposition thereto, and

27 ...

1 finding it unnecessary to hear oral argument, this Court decides the Motions in Limine, and orders as  
2 follows:

3 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED** Defendants' Motion in  
4 Limine No. 1: to Exclude Reference to the Satisfaction of Judgment filed December 22, 2023 is  
5 granted for at least a few reasons: *First*, while the Defendants' Judgment filed against MS.  
6 SHERIDAN is addressed in Paragraph 41 of the Complaint filed August 31, 2020, the fact the  
7 Judgment ultimately was satisfied is not alleged at all within the initial pleading—perhaps as it had  
8 not been satisfied at that point. It follows then, as the Satisfaction of Judgment was not addressed,  
9 the issues relating to causation of damages (if any) resulting from the Notice of Satisfaction of  
10 Judgment not being filed until January 24, 2022 also were not alleged. *Second*, if she believed she  
11 had sustained damages caused by the January 24, 2022 filing of the Notice of Satisfaction of  
12 Judgment, MS. SHERIDAN could have moved this Court to amend her pleading which she did not  
13 do. *Third*, MS. SHERIDAN did not demand a signed Satisfaction of Judgment be provided by  
14 Defendants when the Judgment was satisfied. Further, as fees necessarily are involved to file a  
15 Satisfaction of Judgment with the Court and to record such in the County's Recorder's Office, this  
16 Court finds it was incumbent upon MS. SHERIDAN—the party who would benefit from such a  
17 filing/recording—to do so.

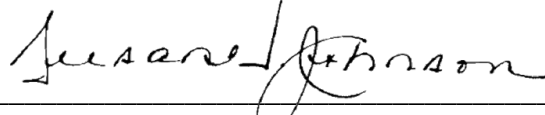
18 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** this Court's ruling  
19 concerning Defendants' Motion in Limine No. 2: to Preclude Steven Istock from Testifying as to  
20 Damages filed December 22, 2023 shall be deferred to the time of trial. With that said, this Court is  
21 mindful, to testify as an expert witness under NRS 50.275, (1) MR. ISTOCK must be qualified in an  
22 area of “scientific, technical or other specialized knowledge” (the qualification requirement); (2) his  
23 specialized knowledge must “assist the trier of fact to understand the evidence or to determine a fact  
24 in issue” (the assistance requirement); and (3) his testimony must be limited “to matters within the  
25  
26  
27  
28

1 scope of his specialized knowledge (the limited scope requirement). *See* Hallmark v. Eldridge, 124  
2 Nev. 492, 498, 189 P.3d 646 (2008).

3 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** this Court shall defer its  
4 ruling regarding Defendants' Motion in Limine No. 3: to Preclude Damages Not Disclosed in  
5 Plaintiff's Rule 16.1 Disclosures filed December 22, 2023 to the time of trial. With that said,  
6 damages must be substantiated by the evidence presented at trial. Further, at the outset, MS.  
7 SHERIDAN must have provided "a computation of each category of damages claimed by the  
8 disclosing party—who must make available for inspection and copying as under [NRCP] 34 the  
9 documents or other evidentiary material, unless privileged or protected from disclosure, on which  
10 each computation is based, including materials bearing on the nature and extent of injuries  
11 suffered..." *See* NRCP 16.1(a)(1)(A)(iv).  
12

13 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED**, as this Court has decided  
14 the issues presented within Defendants' Motions in Limine Nos. 1, 2 and 3, the matters scheduled to  
15 be heard on Tuesday, January 30, 2024 are vacated pursuant to Rule 2.23 of the Eighth Judicial  
16 District Court Rules (EDCR).  
17

18 **Dated this 23rd day of January, 2024**

19 

20 SUSAN H. JOHNSON, DISTRICT COURT JUDGE

21 **D37 1C1 143D ED40**  
22 **Susan Johnson**  
23 **District Court Judge**  
24  
25  
26  
27  
28

1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Rene Sheridan, Plaintiff(s)

CASE NO: A-21-838187-C

7 vs.

DEPT. NO. Department 22

8 Joseph Gutierrez, ESQ,  
9 Defendant(s)

10  
11 **AUTOMATED CERTIFICATE OF SERVICE**

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

Service Date: 1/23/2024

15 Charity Johnson

cmj@mgalaw.com

16 Jason Maier

jrm@mgalaw.com

17 Joseph Gutierrez

jag@mgalaw.com

18 Karen Foley

kfoley@mccnvlaw.com

19 Michael Mushkin

michael@mccnvlaw.com

20 Joseph Garin

jgarin@lipsonneilson.com

21 Jonathan Wong

jwong@lipsonneilson.com

22 RENE SHERIDAN

RSHERIDAN34@AOL.COM

23 PATRICK CANNON

HOTOPIX@GMAIL.COM

24 Cristiana Lopez

clopez@mccnvlaw.com

25 Michele Stones

mstones@lipsonneilson.com

26  
27  
28

1 Suzanne Zaranti

szaranti@mccnvlaw.com

2  
3 If indicated below, a copy of the above mentioned filings were also served by mail  
4 via United States Postal Service, postage prepaid, to the parties listed below at their last  
5 known addresses on 1/24/2024

6 Kenneth Webster

Hall Prangle & Schoonveld, LLC

Attn: Kenneth Webster, Esq

1140 North Town Center Drive, Suite 350

7 Las Vegas, NV, 89144  
8  
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**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Civil Matters**

**COURT MINUTES**

**August 16, 2021**

---

A-21-838187-C      Rene Sheridan, Plaintiff(s)  
vs.  
Joseph Gutierrez, ESQ, Defendant(s)

---

**August 16, 2021      3:00 AM      Minute Order**

**HEARD BY:** Gonzalez, Elizabeth      **COURTROOM:** Chambers

**COURT CLERK:** Valeria Guerra

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- The Court notes plaintiff has filed a motion to continue. Pursuant to NRS 1.235(5) the Court can take no action on that motion and shall proceed no further with the matter until a decision is made on Plaintiffs motion for DQ.

CLERK S NOTE: A copy of this minute order was distributed via Odyssey File and Serve. -  
vg//8/16/21

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Civil Matters**

**COURT MINUTES**

**August 31, 2021**

---

A-21-838187-C      Rene Sheridan, Plaintiff(s)  
vs.  
Joseph Gutierrez, ESQ, Defendant(s)

---

**August 31, 2021      3:00 AM      Motion to Dismiss**

**HEARD BY:** Gonzalez, Elizabeth      **COURTROOM:** Chambers

**COURT CLERK:** Valeria Guerra

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- Pursuant to NRS 1.235(5) the Court can take no action on that motion and shall proceed no further with the matter until a decision is made on Plaintiffs motion for DQ.

CLERK S NOTE: A copy of this minute order was distributed via Odyssey File and Serve. -  
vg//9/3/21

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

## Other Civil Matters

# COURT MINUTES

September 09, 2021

A-21-838187-C      Rene Sheridan, Plaintiff(s)  
vs.  
Joseph Gutierrez, ESQ, Defendant(s)

**September 09, 2021      9:00 AM      Motion to Strike**

**HEARD BY:** Vacant, DC 11; Hardcastle, Kathy    **COURTROOM:** RJC Courtroom 03E

**COURT CLERK:** Valeria Guerra

**RECORDER:** Jill Hawkins

**REPORTER:**

**PARTIES  
PRESENT:**

## JOURNAL ENTRIES

- Court FOUND the present matter was previously filed and assigned to Judge Crockett as case No. A-20-813635-C. The latter Judge Crockett granted Defendant's Motion to Dismiss Without Prejudice. After the case was dismissed Plaintiff filed the in the Second Judicial District Court in Reno, NV. Plaintiff filed in the Second Judicial District Court to avoid further action from Judge Corckett. Defendants filed a motion to dismiss citing Judge Crockett's decision. The motion to dismissed was denied and Defendants filed a motion to change venue which was granted and the case was moved to the Eight Judicial District Court. Under the rules of the District Court when subsequent case is brought about involving the same parties and transactions in order to prevent judge or forum shopping the case is required to be reassigned to the department with the lowest case number.

COURT ORDERED, case A-21-838187-C to be consolidated with A-20-813635-C and transferred to Department 24.

COURT DENIED, Plaintiff's Affidavit of Prejudice since Judge Gonzalez had retired, matter is MOOT.

Defendants pending motion to dismiss needs to be renoticed under A-20-813635-C if it is to be heard.

Pending motion to strike needs to be renoticed under A-20-813635-C if it is to be heard.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Civil Matters**

**COURT MINUTES**

**September 17, 2021**

---

A-21-838187-C      Rene Sheridan, Plaintiff(s)  
vs.  
Joseph Gutierrez, ESQ, Defendant(s)

---

**September 17, 2021      3:00 AM      Motion**

**HEARD BY:** Hardcastle, Kathy

**COURTROOM:** Chambers

**COURT CLERK:** Valeria Guerra

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- The Motion for Continuance came before this Court on the September 17, 2021 Chamber Calendar. The Court has reviewed the Motion and the Limited Opposition. The Court previously reviewed the Motion for Continuance in Relation to the Hearing on September 9, 2021. The Court entered a Minute Order on September 9, 2021 transferring the case to Department 24 to be consolidated with A-20-813635-C. As such, this Department cannot take any further action on this motion. Therefore, COURT ORDERED matter OFF CALENDAR and Plaintiff to Re-notice the Motion if further action is needed.

CLERK S NOTE: A copy of this minute order was distributed via Odyssey File and Serve. -  
vg//9/21/21

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Civil Matters**

**COURT MINUTES**

**October 21, 2021**

---

A-21-838187-C	Rene Sheridan, Plaintiff(s)
	vs.
	Joseph Gutierrez, ESQ, Defendant(s)

---

<b>October 21, 2021</b>	<b>12:00 AM</b>	<b>Minute Order</b>
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**HEARD BY:** Bixler, James

**COURTROOM:** Chambers

**COURT CLERK:**  
Kory Schlitz

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- The Court hereby corrects its minute orders of September 9, 2021 and September 17, 2021. The Minute Orders incorrectly identified the department handling the lower numbered case as Department 24. Case number A-20-813635-C, the lower numbered case into which this matter is consolidated was transferred to Department 8 as a result of Administrative Order 20-25 filed December 31, 2020 ,which reassigned all civil cases in Department 24 to Department 8. See AO-20-25, page 2:17-18. Therefore, the minute orders are hereby ORDERED CORRECTED to reflect the department assigned to this case instead of Department 24

CLERK S NOTE: Counsel are to ensure a copy of the forgoing minute order is distributed to all interested parties; additionally, a copy of the foregoing minute order was distributed to the registered service recipients via Odyssey eFileNV E-Service (10-21-2021 ks).

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Civil Matters**

**COURT MINUTES**

**June 01, 2022**

---

A-21-838187-C      Rene Sheridan, Plaintiff(s)  
vs.  
Joseph Gutierrez, ESQ, Defendant(s)

---

**June 01, 2022      3:00 AM      Minute Order**

**HEARD BY:** Johnson, Susan      **COURTROOM:** Chambers

**COURT CLERK:** Nicole Cejas

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- Having noted Plaintiff filed a Motion and Affidavit for Recusal of Judge Susan Johnson on June 1, 2022, this Court ORDERS the hearings concerning Plaintiff s Motion to Strike Defendants Motion to Dismiss and Defendants Motion to Dismiss scheduled to be heard Thursday, June 2, 2022 at 9:00 a.m.to be VACATED.

CLERK'S NOTE: The above minute order has been distributed to all parties by the Court Clerk via electronic service and/or mail. nc// 6/1/2022

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Civil Matters**

**COURT MINUTES**

**August 04, 2022**

---

A-21-838187-C      Rene Sheridan, Plaintiff(s)  
vs.  
Joseph Gutierrez, ESQ, Defendant(s)

---

**August 04, 2022      9:00 AM      All Pending Motions**

**HEARD BY:** Johnson, Susan      **COURTROOM:** RJC Courtroom 15D

**COURT CLERK:** Samantha Albrecht

**RECORDER:** Norma Ramirez

**REPORTER:**

**PARTIES**

**PRESENT:** Sheridan, Rene      Plaintiff  
Wong, Jonathan K.      Attorney

**JOURNAL ENTRIES**

- DEFENDANT'S MOTION TO DISMISS...PLAINTIFF'S MOTION TO STRIKE DEFENDANT'S MOTION TO DISMISS

As to Plaintiff's Motion to Strike, arguments by counsel. Ms. Sheridan stated she had 5 causes of action. Mr. Wong advised they were not denying a contractual relationship. Court STATED ITS FINDINGS and ORDERED, Motion DENIED.

As to Defendant's Motion to Dismiss, arguments by counsel. Upon Court's inquiry, Mr. Wong was not sure if a Satisfaction of Judgment had been filed. COURT FURTHER ORDERED, Motion GRANTED IN PART as to Claim #2, breach of contract, quasi contract, and Claim #4, breach of implied covenant of good faith and fair dealing, which was all within the professional negligence claim and DENIED IN PART as to the negligence claim and DISMISSED the prayer for punitive damages, as punitive damages are not awarded for negligence, breach of contract, quasi contract and breach of implied covenant of good faith and fair dealing claims. Court FINDS there was no claim for fraud as that was dismissed by the Second District Court and Plaintiff had failed to provide facts to indicate the failing to file a Judgment of Satisfaction was fraudulent.

Court advised Ms. Sheridan she would need an expert witness, who was a lawyer, to testify on her behalf as to professional negligence. COURT FURTHER ORDERED, the first cause of action would REMAIN. Ms. Sheridan requested leave to amend the Complaint. Court advised it would not grant Ms Sheridan's oral request for leave to amend and directed her to file the appropriate pleading with the proposed amendment. Court directed Mr. Wong to prepare the order and speak to his clients regarding the filing of a Satisfaction of Judgment.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Civil Matters**

**COURT MINUTES**

**December 07, 2022**

---

A-21-838187-C      Rene Sheridan, Plaintiff(s)  
vs.  
Joseph Gutierrez, ESQ, Defendant(s)

---

**December 07, 2022      8:30 AM      Mandatory Rule 16  
Conference**

**HEARD BY:** Johnson, Susan      **COURTROOM:** RJC Courtroom 15D

**COURT CLERK:** Nicole Cejas

**RECORDER:** Norma Ramirez

**REPORTER:**

**PARTIES**

**PRESENT:**      Garin, Joseph P      Attorney  
Sheridan, Rene      Plaintiff

**JOURNAL ENTRIES**

- Counsel anticipated 3-5 days to try. Colloquy on close of discovery date. Court reviewed the following due dates set forth in the Joint Case Conference Report:

Close of discovery: 10/11/2023, Motions to amend: 7/13/2023, Expert disclosures - initial: 7/13/2023, Expert disclosures - rebuttal: 8/11/2023, Dispositive motions: 11/9/2023.

COURT ORDERED, trial dates SET; advised it would send out a Trial Scheduling Order.

Court advised the judicial settlement conference program was available through Department 30 and that counsel could contact the Department's Judicial Executive Assistant, Angela McBride (McBrideA@clarkcountycourts.us), if interested; further advised it could be done either in-house or remotely.

Ms. Sheridan stated she has requested Mr. Garin to provide an unredacted billing statements. Court advise Ms. Sheridan that discovery begins and she can make her request in writing to Mr. Garin. Mr. Garin has 30 days to reply and provide whatever documents she has requested.

10/18/2023 - 8:30 AM - STATUS CHECK: TRIAL READINESS

1/24/2024 - 8:30 AM - PRETRIAL CONFERENCE/CALENDAR CALL

2/5/2024 - 8:30 AM - JURY TRIAL

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Civil Matters**

**COURT MINUTES**

**June 27, 2023**

---

A-21-838187-C      Rene Sheridan, Plaintiff(s)  
vs.  
Joseph Gutierrez, ESQ, Defendant(s)

---

**June 27, 2023      8:30 AM      Motion for Partial  
Summary Judgment**

**HEARD BY:** Johnson, Susan      **COURTROOM:** RJC Courtroom 15D

**COURT CLERK:** Nicole Cejas

**RECORDER:** Norma Ramirez

**REPORTER:**

**PARTIES**

**PRESENT:** Sheridan, Rene      Plaintiff  
Wong, Jonathan K.      Attorney

**JOURNAL ENTRIES**

- Arguments by counsel and Ms. Sheridan. COURT ORDERED, motion DENIED WITHOUT PREJUDICE. COURT FURTHER ORDERED, Defendant's request for attorney fees and costs DENIED. Mr. Wong to prepare the Order.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Civil Matters**

**COURT MINUTES**

**July 13, 2023**

---

A-21-838187-C      Rene Sheridan, Plaintiff(s)  
vs.  
Joseph Gutierrez, ESQ, Defendant(s)

---

**July 13, 2023      9:00 AM      Motion for Protective  
Order**

**HEARD BY:** Johnson, Susan

**COURTROOM:** RJC Courtroom 15D

**COURT CLERK:** Stephanie Squyres

**RECORDER:** Norma Ramirez

**REPORTER:**

**PARTIES**

**PRESENT:** Sheridan, Rene      Plaintiff  
Wong, Jonathan K.      Attorney

**JOURNAL ENTRIES**

- Arguments by Plaintiff regarding using previous malpractice cases for trial. Mr. Wong indicated the Plaintiff has served subpoenas, filed a Notice of Intent, and Plaintiff received policy regarding coverage. COURT ORDERED, subpoenas are hereby STRICKEN, and Motion is GRANTED. Plaintiff is not allowed to bring in every malpractice case regarding the same hospital, Plaintiff is only allowed to bring in evidence of what harm was done to Plaintiff. Mr. Wong to prepare the Order.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Civil Matters**

**COURT MINUTES**

**August 29, 2023**

---

A-21-838187-C	Rene Sheridan, Plaintiff(s)
	vs.
	Joseph Gutierrez, ESQ, Defendant(s)

---

<b>August 29, 2023</b>	<b>3:00 AM</b>	<b>Minute Order</b>
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<b>HEARD BY:</b> Johnson, Susan	<b>COURTROOM:</b> Chambers
---------------------------------	----------------------------

**COURT CLERK:** Nicole Cejas

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- Having examined Plaintiff s Motion to Reconsider Order Granting Defendant s Motion for a Protective Order filed August 3, 2023 in preparation for the hearing scheduled Thursday, September 7, 2023 at 9:00 a.m., noted Plaintiff did not seek leave of this Court to rehear the Motion for Protective Order pursuant to Rule 2.24(a) of the Eighth Judicial District Court Rules (EDCR) and Rule 13(7) of the District Court Rules (DCR), and did not provide a basis for the matter to be reconsidered and there is good cause therefore, COURT ORDERS Plaintiff s Motion to Reconsider Order Granting Defendant s Motion for a Protective Order filed August 3, 2023 is DENIED. The matter scheduled to be heard Thursday, September 7, 2023 at 9:00 a.m. is VACATED pursuant to EDCR 2.23. Defendant s request for reimbursement of attorney s fees and costs incurred in defending the motion is DENIED without prejudice. Defense counsel is to prepare and submit a proposed Order to the Court within fourteen (14) days of this Minute Order or no later than Tuesday, September 12, 2023 pursuant to EDCR 7.21.

CLERK'S NOTE: The above minute order has been distributed to all parties by the Court Clerk via electronic service and/or mail. nc / / 8/29/2023

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Civil Matters****COURT MINUTES****October 05, 2023**

A-21-838187-C      Rene Sheridan, Plaintiff(s)  
    vs.  
    Joseph Gutierrez, ESQ, Defendant(s)

**October 05, 2023      9:00 AM      All Pending Motions**

**HEARD BY:** Johnson, Susan      **COURTROOM:** RJC Courtroom 15D

**COURT CLERK:** Stephanie Rapel

**RECORDER:** Norma Ramirez

**REPORTER:**

**PARTIES**

**PRESENT:**      Sheridan, Rene      Plaintiff  
    Wong, Jonathan K.      Attorney

**JOURNAL ENTRIES**

- DEFENDANT'S MOTION TO STRIKE (1) PLAINTIFF'S UNTIMELY OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT; AND (2) IMPROPER SUPPLEMENT TO INITIAL EXPERT DISCLOSURES ON ORDER SHORTENING TIME... DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Upon Court's inquiry, Mr. Wong argued Ms. Sheridan's Opposition to Defendant's Motion for Summary Judgment ("MSJ") was untimely, there was no excusable neglect or good cause for the delay and the Court had authority to grant the Motion as unopposed. Mr. Wong further argued Plaintiff's supplemental expert report was improper considering the purpose of the report was to rebut arguments in Defendant's MSJ. Ms. Sheridan elaborated on misleading information which resulted in her late opposition and argued, as a pro se litigant, she was entitled to some leeway. Following further arguments, Court stated its Findings and ORDERED Motion to Strike DENIED as to untimely Opposition and GRANTED as to Improper Supplement to Initial Expert Disclosures. COURT DIRECTED Mr. Wong to prepare the Order with detailed Findings of Fact and Conclusions of Law, circulate to opposing party, and submit to the Court pursuant to EDCR 7.21 and the current Administrative Orders.

Court INQUIRED into Rule 56 (d) request for continuance and discovery deadline. Mr. Wong argued Plaintiff's declaration was insufficient considering it did not address what information would be sought to defeat the Motion for Summary Judgment. Upon Court's inquiry, Ms. Sheridan elaborated on the outstanding information needed to combat Defendant's Motion for Summary Judgment and noted the discovery deadline had yet to expire. Colloquy regarding Mr. Gutierrez, Mr. Knaus and Ms. Sheridan's outstanding depositions. Court stated its Findings and ORDERED Defendant's Motion for Summary Judgment CONTINUED to allow Plaintiff time to complete discovery before October 11, 2023 and to take Mr. Gutierrez's deposition. Court FURTHER GRANTED an audiovisual deposition of Ms. Sheridan with the perimeters outlined in Open Court.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Other Civil Matters

COURT MINUTES

October 18, 2023

A-21-838187-C      Rene Sheridan, Plaintiff(s)  
vs.  
Joseph Gutierrez, ESQ, Defendant(s)

October 18, 2023      8:30 AM      Status Check: Trial  
Readiness

HEARD BY: Johnson, Susan      COURTROOM: RJC Courtroom 15D

COURT CLERK: Nicole Cejas

RECORDER: Norma Ramirez

REPORTER:

**PARTIES**

PRESENT:      Sheridan, Rene      Plaintiff  
Wong, Jonathan K.      Attorney

**JOURNAL ENTRIES**

- Court stated the matter is set for a jury trial and is number three on the trial stack. Upon inquiry of the Court regarding trial readiness, Ms. Sheridan stated she is not ready. Ms. Sheridan further stated a Motion to Compel is set before the Discovery Commissioner for November 17; advised there are issues that would need to be address and effect the trial date. Court stated it will not continue deadlines until the Discovery Commissioner issues their decision. Ms. Sheridan requested Defendant's Motion for Summary Judgment to be rescheduled pending the Motion to Compel to be heard. Mr. Wong stated he has no objection to rescheduling the Motion for Summary Judgment if Ms. Sheridan agreed to rescheduling Mr. Gutierrez's deposition. Following colloquy regarding depositions, COURT ORDERED, Motion for Summary Judgment RESET. Court DIRECTED counsel and Ms. Sheridan to discuss new dates for Mr. Gutierrez's deposition date; advised the deposition should take place after Mr. Gutierrez's trial when he is available.

12/12/2023 8:30 AM DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

## Other Civil Matters

# COURT MINUTES

November 17, 2023

A-21-838187-C      Rene Sheridan, Plaintiff(s)  
vs.  
Joseph Gutierrez, ESQ, Defendant(s)

**November 17, 2023      9:30 AM      Motion to Compel**

**HEARD BY:** Ganz, Adam

**COURTROOM:** RJC Level 5 Hearing Room

**COURT CLERK:** Briana Barrett

**RECORDER:** Francesca Haak

**REPORTER:**

## PARTIES

**PRESENT:** Mushkin, Michael R. Attorney  
Wong, Jonathan K. Attorney

## JOURNAL ENTRIES

- Argument by counsel. Commissioner noted a notary needs to be present with the deponent. COMMISSIONER RECOMMENDED, Plaintiff s Motion to Compel Deposition of Defendant Steven Knauss Sanctions Request GRANTED IN PART/DENIED IN PART. Motion GRANTED as to the Deposition and DENIED as to the Request for Sanctions. Commissioner further noted he found good cause and excusable neglect. Commissioner stated he would like the Deposition at issue to take place on the same date as Mr. Gutierrez Deposition. COMMISSIONER FURTHER RECOMMENDED, the fourteen-day notice for the Deposition is WAIVED. Commissioner directed Plaintiff to re-notice the Deposition.

Mr. Mushkin to prepare the Report and Recommendations, and Mr. Wong to approve as to form and content. Comply with Administrative Order 20-10, and submit the DCCR to [DiscoveryInbox@clarkcountycourts.us](mailto:DiscoveryInbox@clarkcountycourts.us). A proper report must be timely submitted within fourteen days of the hearing. Otherwise, counsel will pay a contribution. COMMISSIONER RECOMMENDED, Status Check SET; if the DCCR is submitted, the Discovery office will vacate the Status Check.

12/15/2023 9:15 AM STATUS CHECK: COMPLIANCE 11/17/2023 DCRR (MR. MUSHKIN)

PRINT DATE: 02/21/2024

Page 18 of 20

Minutes Date: August 16, 2021

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Civil Matters**

**COURT MINUTES**

**December 14, 2023**

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A-21-838187-C      Rene Sheridan, Plaintiff(s)  
vs.  
Joseph Gutierrez, ESQ, Defendant(s)

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**December 14, 2023      9:00 AM      All Pending Motions**

**HEARD BY:** Johnson, Susan      **COURTROOM:** RJC Courtroom 15D

**COURT CLERK:** Brittany Graves

**RECORDER:** Norma Ramirez

**REPORTER:**

**PARTIES**

**PRESENT:**      Mushkin, Michael R.      Attorney  
Wong, Jonathan K.      Attorney

**JOURNAL ENTRIES**

**- PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Arguments by counsel regarding Motion. COURT ORDERED, Motion DENIED. Court noted these are issues that need to go to the jury.

**MOTION FOR SUMMARY JUDGMENT**

Arguments by counsel regarding Motion. COURT ORDERED, Motion DENIED.

**PLAINTIFF'S MOTION TO ALTER OR AMEND ORDER ENTERED ON October 14TH, 2003**

Court noted it is inclined to deny this as the order reflected exactly as ordered in court. COURT ORDERED, Motion DENIED.

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT BASED ON PLAINTIFF S FAILURE TO PROVIDE DAMAGES COMPUTATION, OR ALTERNATIVELY, FOR RULE 37 SANCTIONS**

Arguments by counsel regarding Motion. COURT ORDERED, Motion DENIED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Civil Matters**

**COURT MINUTES**

**January 17, 2024**

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A-21-838187-C      Rene Sheridan, Plaintiff(s)  
vs.  
Joseph Gutierrez, ESQ, Defendant(s)

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**January 17, 2024      8:30 AM      Pretrial/Calendar Call**

**HEARD BY:** Johnson, Susan      **COURTROOM:** RJC Courtroom 15D

**COURT CLERK:** Stephanie Squyres

**RECORDER:** Norma Ramirez

**REPORTER:**

**PARTIES**

**PRESENT:**      Mushkin, Michael R.      Attorney  
                 Sheridan, Rene      Plaintiff  
                 Wong, Jonathan K.      Attorney

**JOURNAL ENTRIES**

- Court noted this case is number two on the stack. Mr. Wong inquired they are not prepared for trial as he is doing a Writ Petition with client, waiting on transcript from December, speaking with insurance carrier about settlement offer, and need to speak with opposing counsel about settlement. Mr. Mushkin agreed there has been discussion about a settlement conference. COURT ORDERED, trial is VACATED and RESET. A new scheduling order will be issued.

02/28/24 8:30 AM CALENDAR CALL

03/11/24 8:30 AM JURY TRIAL



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

**RENE SHERIDAN**  
**23823 MALIBU RD., #50-364**  
**MALIBU, CA 90265**

**DATE: February 21, 2024**  
**CASE: A-21-838187-C**

**RE CASE:** RENE SHERIDAN vs. JOSEPH A. GUTIERREZ; STEVEN G. KNAUSS; JASON R. MILLER.; MAIER  
GUTIERREZ & ASSOCIATES

NOTICE OF APPEAL FILED: February 16, 2024

**YOUR APPEAL HAS BEEN SENT TO THE SUPREME COURT.**

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

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

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

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

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

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

# Certification of Copy

State of Nevada }  
County of Clark } SS:

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

NOTICE OF APPEAL; CASE APPEAL STATEMENT; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET; ORDER RE: DEFENDANTS' MOTIONS IN LIMINE NOS. 1, 2 AND 3; NOTICE OF ENTRY OF ORDER RE: DEFENDANTS' MOTIONS IN LIMINE NOS. 1, 2 AND 3; DISTRICT COURT MINUTES; NOTICE OF DEFICIENCY

RENE SHERIDAN,

Plaintiff(s),

vs.

JOSEPH A. GUTIERREZ; STEVEN G.  
KNAUSS; JASON R. MILLER.; MAIER  
GUTIERREZ & ASSOCIATES,

Defendant(s),

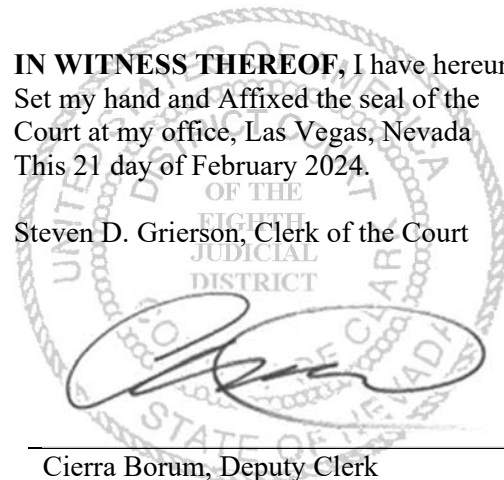
Case No: A-21-838187-C

Dept No: XXII

now on file and of record in this office.

**IN WITNESS THEREOF**, I have hereunto  
Set my hand and Affixed the seal of the  
Court at my office, Las Vegas, Nevada  
This 21 day of February 2024.

Steven D. Grierson, Clerk of the Court



Cierra Borum, Deputy Clerk