

1                   **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2           IN THE MATTER OF THE  
3           CHRISTIAN FAMILY TRUST U/A/D 10/11/16

Case No.: 75750  
Electronically Filed  
May 10 2019 08:13 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

4           \_\_\_\_\_  
5           SUSAN CHRISTIAN-PAYNE,  
6           ROSEMARY KEACH, AND  
7           RAYMOND CHRISTIAN, JR.,  
  Appellants,

8                                   vs.  
9           JACQUELINE UTKIN,  
  Respondent.

10           **MOTION FOR SANCTIONS AND AWARD OF ATTORNEY’S FEES**

11           Anthony L. Barney, Ltd. (hereinafter ALB, Ltd.) by and through its attorney  
12           Anthony L. Barney, Esq. hereby files its Motion for Sanctions (“Motion”) against  
13           Cary Colt Payne, Esq. and Appellants Susan Christian-Payne, Rosemary Keach,  
14           and Raymond Christian, Jr. (“Appellants”). This Motion is based upon the  
15           following legal points and authorities, referenced documents, pleadings, and any  
16           evidence that may be adduced at a hearing upon this Motion.  
17

18                                   **LEGAL POINTS AND AUTHORITIES**

19           **A. FACTS**

- 20           1. On June 7, 2018, the Appellants and Cary Colt Payne, Esq. (hereinafter  
21           “Payne”) signed their docketing statement under penalty of perjury stating  
22           ALB, Ltd. was the only Respondent. *See Appellant’s Docketing Statement*  
23           *filed 6/7/18 at Paragraph 3 (hereinafter as “ADS 2018”)*  
24  
25           2. Based upon the Appellants’ docketing statement, the Supreme Court ordered  
26           ALB, Ltd. to file a docketing statement within ten (10) days. *See Notice of*  
27           *Filing Docketing Statement filed 6/7/18 hereinafter “NOTFDS 2018.”*  
28

- 1 3. On June 13, 2018, this Court *sua sponte* added Jacqueline Utkin as a  
2 Respondent to this appeal. *See Order Modifying Caption filed 6/13/18*  
3 *(hereinafter, "OMC 2018")*
- 4
- 5 4. Payne did not notify the Court within 11 days that her addition or his prior  
6 naming of ALB, Ltd. was not an accurate reflection of the parties' status.
- 7 5. Appellants alleged that ALB, Ltd. was never a real party in interest. *See*  
8 *Appellant/Cross-Respondents' Opening Brief dated 1/9/19 at Page 9*  
9 *hereinafter as "AOB 2019" and Appellant/Cross-Respondent's Motion to*  
10 *Strike Combined Answering Brief/Cross Appeal Opening Brief, Dismiss*  
11 *Cross Appeal, Etc., and Stay of Briefing Pending Resolution dated 4/10/19*  
12 *at Page 6 hereinafter, "MTS 2019."*
- 13
- 14 6. Appellants argued against their own sworn statements, stating, "It is  
15 submitted that the Supreme Court lacks jurisdiction to hear cross-appeal of  
16 The Barney Firm, and same should be dismissed in in its entirety...The  
17 Barney Firm lacks standing to participate in the appeal as a party." *See MTS*  
18 *2019 at 6.*
- 19
- 20 7. Appellant and Payne's arguments were confirmed against their prior sworn  
21 statements to this Court, holding, "Appellants/cross-respondents' appeal is  
22 dismissed as to Anthony L. Barney, Ltd. only. Anthony L. Barney's cross  
23 appeal is dismissed in its entirety, and the clerk shall strike its combined  
24 brief file on March 27, 2019." *See Order Dismissing Appeal In Part and*  
25 *Dismissing Cross-Appeal dated 5/7/19 at Page 2 hereinafter "ODA 2019."*
- 26
- 27 8. While Jacqueline Utkin was the trustee of the Christian Family Trust dated  
28 October 13, 2016 ("CFT") and the real party in interest until November 13,

1 2018, she was not a trustee of the CFT thereafter. *See Response to Order*  
2 *Granting Motion and Regarding Caption dated 2/4/19 at Pages 1-2*  
3 *hereinafter "ROGM 2019."*

4  
5 9. The Appellants have admittedly created an appeal against the CFT without  
6 naming its trustee, Fred Waid, as a real party in interest stating "the only  
7 individual/entity who could oppose the instant appeal would be the current  
8 trustee of the CFT as the real party in interest or the CFT beneficiaries." *See*  
9 *AOB 2019 at 9*

10  
11 10. Fred Waid's counsel entered a notice of appearance with this Court on  
12 February 13, 2019. *See Notice of Appearance dated 2/13/19,*

13 11. On January 24, 2019, this Court attempted to clarify the real party in interest  
14 again stating, "Accordingly, appellants and cross-appellant shall have 7 days  
15 from the date of this order to inform this court in writing whether Ms. Utkin  
16 remains a party to this appeal." *See Order dated 1/24/19, emphasis added.*

17  
18 12. Appellants represented to this Court that, "She [Jacqueline Utkin] is the  
19 consenting and necessary party in this matter, and should file a response,  
20 etc." *See Appellant/Cross-Respondents' Response Regarding Respondent*  
21 *Utkin filed 1/13/19 at Page 2, contrast with AOB 2019 at 9.*

22  
23 13. Conversely, ALB, Ltd. stated, "Jacqueline Utkin ("Ms. Utkin") was a real  
24 party in interest to this appeal, if at all, solely because she was trustee of the  
25 [CFT] at the time the appeal was noticed. Ms. Utkin has since been  
26 removed as Trustee of the Trust by the Eighth Judicial District  
27 Court's...therefore, Fred Waid, as the newly appointed trustee of the Trust,  
28 is the only authorized person to act on behalf of the Trust [CFT] at this time

1 and, thus, would be the real party in interest.” *See Response to Order*  
2 *Granting Motion and Regarding Caption dated February 4, 2019 at Pages*  
3 *1-2 hereinafter as “RTOGM 2019.”*

4  
5 14. Although not disclosed at the time, it appears that the Appellants agreed with  
6 this statement regarding the current trustee of the CFT when they stated that  
7 “the only individual/entity who could oppose the instant appeal would be the  
8 current trustee of the CFT as the real party in interest or the CFT  
9 beneficiaries.” *See AOB 2019 at 9.*

10  
11 15. Proceeding pro se in her individual capacity, “Ms. Utkin filed a document,  
12 dated March 12, 2019, stating, “I’m opting out-Please remove me.” *See*  
13 *ODA 2019.*

14  
15 16. Despite their docketing statement sworn under penalty of perjury that ALB,  
16 Ltd. was the real party in interest, Appellants and Payne remained silent for  
17 more than ten (10) months prior to filing a motion to reverse their sworn  
18 statements to this Court. *Compare NOTFDS 2018 and MTS 2019 at Page 6.*

19  
20 17. On June 13, 2018, this Court ordered that Appellants notify it within 11 days  
21 if the Court’s caption naming ALB, Ltd. was not an accurate reflection of  
22 the parties’ status. Payne and Appellants remained silent for ten (10) months.

23  
24 18. Only after Appellants caused ALB, Ltd. to respond did they move to  
disclose that they believed that ALB, Ltd. was not the real party in interest.

## 25 **B. LEGAL ARGUMENT**

### 26 1. Sworn Verification that ALB, Ltd. Was the only Real Party In Interest

27 The Appellants and Payne filed their docketing statement on June 7, 2018 and  
28 affirmed under penalty of perjury their duties under NRAP 14(c) and the

1 imposition of sanctions pursuant to *KDI Sylvan Pools, v. Workman*, 107 Nev. 340,  
2 344, 810 P.2d 1217, 1220 (1991)....” See *ADS 2018*.

3 The Appellants and Payne then verified under penalty of perjury that ALB, Ltd.  
4 was the only Respondent. *Id.* Despite their admitted belief to the contrary,  
5 Appellants and Payne never corrected the real party in interest designation sworn  
6 under penalty of perjury ten (10) months prior, even after given an opportunity to  
7 do so by this court on June 13, 2018. See *OMC 2018*.

8  
9 2. Violation of Attorney Certification under NRAP Rules 28.2 and NRAP 26.1

10 In Appellants’ opening brief, Payne certifies that understanding of the potential  
11 sanctions under NRAP 28(e)(1). See *AOB 2019 at Page ii*.

12 As part of Payne’s NRAP 26.1 Disclosure, he lists ALB, Ltd. as the  
13 Respondent/Cross Appellant. See *AOB 2019 at Page i*. Appellants list “Anthony  
14 L. Barney, Ltd. (creditor)” as the Respondent. See *AOB 2019 at Page 1*. However,  
15 Payne then argued, “...The Barney Firm lacks standing to participate in the appeal  
16 as a party...” See *MTS 2019 at Page 6*.

17 It is clear that Payne’s certifications to this Court were false and were never  
18 corrected. Payne discloses the extent of his knowledge stating, “Barney is not a  
19 real party in interest” and further stating “the only individual/entity who could  
20 oppose the instant appeal would be the current trustee of the CFT as the real party  
21 in interest or the CFT beneficiaries.” See *AOB 2019 at Page 9*.

22 NRAP 28 (j) provides that, “All briefs...must be concise, presented with  
23 accuracy,...Briefs that are not in compliance may be disregarded or stricken, on  
24 motion...and the court may assess attorneys fees or other monetary sanctions.”  
25  
26  
27  
28

1 Payne and Appellants presented ALB, Ltd. as the Respondent even though it was  
2 their stated belief that ALB, Ltd. was not the real party in interest. After providing  
3 sworn statements that ALB, Ltd. was the real party in interest to respond their  
4 appeal, Appellants and Payne waited ten (10) months burdening both ALB, Ltd.  
5 and this Court with reviewing pleadings, making numerous orders regarding the  
6 caption, and then moving to strike ALB, Ltd.'s response. *See ADS 2018 and AOB*  
7 *2019 at Pages i. and ii, and 9 and MTS 2019 at Page 6.*

8  
9 NRAP Rule 28.2(c) provides in pertinent part that, "The Supreme Court....may  
10 impose sanctions against an attorney whose certification is incomplete or  
11 inaccurate. In addition, the Supreme Court...may impose sanctions against any  
12 attorney who, upon being informed that the brief does not contain the certificate  
13 provided for by subsection (a), fails to cure the deficiency within 14 days after the  
14 omission is called to his or her attention." It is clear that Payne and the Appellants  
15 believed that ALB, Ltd. "is not a real party in interest" to respond to their appeal at  
16 the latest on January 9, 2019, and failed to cure their deficiency within 14 days.  
17 *See AOB 2019 at Page 9.* To date, Payne and Appellants haven't corrected their  
18 certifications to reflect their belief that ALB, Ltd. is not a real party in interest.  
19  
20

### 21 3. Attorney and Appellant Violation of NRAP 38

22 NRAP 38 provides that if this Court "determines that an appeal is frivolous, it  
23 may impose monetary sanctions. *See NRAP 38(a).* NRAP 38(b) provides that  
24 when an appeal has frivolously been taken or been processed in a frivolous  
25 manner, when circumstances indicate that an appeal has been taken or processed  
26 solely for purposes of delay, when an appeal has been occasioned through  
27 respondent's imposition on the court below, or whenever the appellate processes of  
28

1 the court have otherwise been misused, the court may, on its own motion, require  
2 the offending party to pay, as cost on appeal, such attorney fees as it deems  
3 appropriate to discourage like conduct in the future. ALB, Ltd.'s billing records  
4 have been provided to this Court for such an award of attorney's fees as Exhibit 1.  
5

6 Payne and Appellants admittedly believed that ALB, Ltd. was not a real party in  
7 interest. *See AOB 2019 at Page 9.* Notwithstanding this admitted knowledge, they  
8 willingly perjured themselves, and then waited until ALB, Ltd. had provided them  
9 with a response to their appellate arguments before disclosing their belief that  
10 ALB, Ltd. was not a real party in interest. *See ADS 2018.*  
11

12 *a. Payne and Appellants Conduct Was Frivolous*

13 It is clear from the admission of Payne and the Appellants that they processed an  
14 appeal against a party that they clearly believed was not the real party in interest,  
15 and caused them to file a response to their appeal before disclosing this knowledge.  
16 *See MTS 2019 at Page 6.* Payne and the Appellants designated ALB, Ltd. as the  
17 responding party and then moved to strike the response of the responding party.  
18 Payne and the Appellants misconduct caused ALB, Ltd. to expend financial  
19 resources, while they delayed their disclosure to this Court regarding their belief  
20 that ALB, Ltd. was not a real party in interest.  
21

22  
23 Payne and the Appellants' egregious conduct is amplified when considered  
24 within the context of these proceedings. On February 4, 2019, ALB, Ltd. explained  
25 that, "Jacqueline Utkin ("Ms. Utkin") was a real party in interest to this appeal, if  
26 at all, solely because she was trustee of the Trust [CFT] at the time the appeal was  
27 noticed. Ms. Utkin has since been removed as Trustee of the Trust  
28 [CFT]...therefore, Fred Waid, as the newly appointed trustee of the Trust [CFT], is

1 the only authorized person to act on behalf of the Trust at this time and, thus,  
2 would be the real party in interest.” See *RTOGM 2019 at Pages 1-2*. Despite ALB,  
3 Ltd.’s explanation that Fred Waid, as court appointed trustee of the Trust would be  
4 a proper real party in interest, and Appellants subsequent agreement by their  
5 statement that “the only individual/entity who could oppose the instant appeal  
6 would be the current trustee of the CFT as the real party in interest or the CFT  
7 beneficiaries,” Payne and Appellants forged ahead with the appeal against ALB,  
8 Ltd., a party that they admittedly believed was not a real party in interest. Such  
9 conduct is clearly at a minimum the “processing” of a frivolous appeal and at a  
10 maximum a clear “taking” of a frivolous appeal against ALB, Ltd.  
11  
12

13 The Nevada Legislature revised NRS 18.010 in 2003 to further define a frivolous  
14 claim as one that is maintained without reasonable ground. *2003 Nev. Stat., ch.*  
15 *508, §153, at 3478*. Payne and the Appellants have now been forced to concede by  
16 order of this Court that any claim against ALB, Ltd. (a nonparty) is without  
17 reasonable ground based upon Payne and the Appellants’ adopted declaration by  
18 this Court that ALB, Ltd. is not a real party in interest, and must be dismissed.  
19

20 NRS 18.010 (2)(b) provides in pertinent part, “Without regard to the recovery  
21 sought, when the court finds that the claim, counterclaim, cross-claim or third-  
22 party complaint or defense of the opposing party was brought or maintained  
23 without reasonable ground or to harass the prevailing party. The Court shall  
24 liberally construe the provisions of this paragraph in favor of awarding attorney’s  
25 fees in all appropriate situations...to punish for and deter frivolous or vexatious  
26 claims and defenses because such claims and defenses overburden limited judicial  
27  
28



1 resources, hinder the timely resolution of meritorious claims and increase the costs  
2 of engaging in business and providing professional services to the public.

3 It was clear from their sworn declaration of Payne and Appellants that they  
4 named ALB, Ltd. as the real party in interest, only to later disclose their belief that  
5 ALB, Ltd. was not the real party in interest. It was clear that this knowledge was  
6 held by the Payne and Appellants from the inception of their appeal, and only  
7 disclosed to this Court after ALB, Ltd. set forth its responsive briefing, which will  
8 now never be considered upon its merits.  
9

10  
11 Despite maintaining an appeal against a party that Payne and the Appellants'  
12 admittedly believed could not file a responsive pleading as a real party in interest,  
13 they misused this Court's resources, and caused severe financial detriment to ALB,  
14 Ltd. in responding to their appeal.

15  
16 Rather than seeking to voluntarily correct their false statements to this Court or to  
17 voluntarily dismiss ALB, Ltd. as the named Respondent, the Appellants instead  
18 motioned the Court to strike ALB, Ltd.'s responsive briefing. ALB, Ltd. chose not  
19 to incur further legal expense or multiply its damages by filing a response to  
20 Appellant/Cross-Respondents' MTS 2019, because it simply was unable to argue  
21 on behalf of Fred Waid, the court-appointed trustee of the CFT, who it believes is  
22 the only real party in interest able to act for the CFT.  
23

24 While there is no requirement that "frivolousness" be determined at the time an  
25 appellate pleading is filed, it is clear that Payne and Appellants believed ALB, Ltd.  
26 was not a real party in interest from the inception of their appeal. *Prestige of*  
27 *Beverly Hills, Inc. v. Weber*, No. 55837, 2012 Nev. Unpub. LEXIS 422, at \*25  
28 (Mar. 21, 2012) (frivolousness is not required to be determined at the time the

1 claim is filed if maintained without reasonable ground). Notwithstanding, Payne  
2 and the Appellants frivolously continued to prosecute their appellate claims against  
3 ALB, Ltd. for a response it would seek to strike.  
4

### 5 **C. REQUEST FOR RELIEF**

6 Based upon the foregoing, ALB, Ltd. respectfully requests that this Court issue  
7 sanctions in an amount be determined by this Court to discourage similar conduct  
8 in the future and award its attorneys fees and cost pursuant to NRAP 38 as follows,  
9

10 1. Sanction Cary Colt Payne, Esq. and the Appellants for their false statements  
11 to this Court under penalty of perjury;

12 2. Sanction Cary Colt Payne, Esq. for his misrepresentations to this Court that  
13 ALB, Ltd. was the proper Respondent in violation of NRAP Rule 28.2(c);

14 3. Sanction Cary Colt Payne, Esq. for failing to remove his misrepresentation  
15 within 14 days of his knowledge thereof in violation of NRAP Rule 28.2(c);

16 4. Sanction Cary Colt Payne, Esq. and the Appellants for frivolously taking and  
17 processing an appeal against ALB, Ltd. which they admittedly believed had no  
18 legal standing or ability to respond to the appeal;  
19

20 5. Sanction Cary Colt Payne, Esq. and Appellants for taking and processing an  
21 appeal that it knew would misuse this Court's appellate resources;  
22

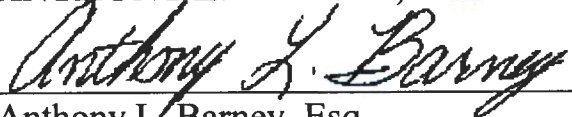
23 6. Award attorney's fees to ALB, Ltd. in the amount of \$20,470.00 in  
24 responding to the frivolous appeal by taken and processed by Payne and the  
25 Appellants against ALB, Ltd.

26 7. Such further relief that this Court deems appropriate against Cary Colt  
27 Payne, Esq. and the Appellants in light of their misrepresentations to this Court.  
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DATED this 10<sup>th</sup> day of May 2019.

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Respectfully Submitted,  
**ANTHONY L. BARNEY, LTD.**

  
\_\_\_\_\_

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office@anthonybarney.com  
*Attorneys for Anthony L. Barney, Ltd.*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of Anthony L. Barney, Ltd., and not a  
3 party to this action. I further certify that, except as otherwise noted, on May 10,  
4 2019, I served the foregoing MOTION FOR SANCTIONS AND AWARD OF  
5 ATTORNEY’S FEES through the Nevada Supreme Court electronic filing system  
6 upon the following persons or entities:  
7

8 Cary Colt Payne, Esq.  
9 700 S. 8<sup>th</sup> St.  
10 Las Vegas, NV 89101  
11 *Attorney for Susan Christian-Payne,  
Rosemary Keach, and Raymond Christian, Jr.*

12 Russel J. Geist, Esq.  
13 10080 West Alta Drive, Suite 200  
14 Las Vegas, Nevada 89145  
15 *Attorney for Fredrick P. Waid*

16 Jacqueline Utkin  
17 445 Seaside Avenue Apt 4005  
18 Honolulu, Hawaii 96815

19  
20   
21 \_\_\_\_\_  
22 Employee of Anthony L. Barney, Ltd.

## EXHIBIT 1

# Anthony L. Barney, Ltd.

## SALES BY CUSTOMER DETAIL

January 9 - May 9, 2019

DATE	TRANSACTION TYPE	NUM	PRODUCT/SERVICE	MEMO/DESCRIPTION	QTY	SALES PRICE	AMOUNT	BALANCE
Christian, Nancy								
01/15/2019	Invoice	3746	Review	01/10/19 Review Opening Brief from Former Trustees; Interoffice discussion re: issues in opening brief (TSB)	0.80	350.00	280.00	280.00
01/15/2019	Invoice	3746	Review	01/10/19 Review Appellate Brief by Payne (ZDH)	1.30	300.00	390.00	670.00
01/15/2019	Invoice	3746	Draft/Revise	01/11/19 Begin Draft of Answering Brief (TSB)	3.30	350.00	1,155.00	1,825.00
01/31/2019	Invoice	3784	Draft/Revise	01/25/19 Draft Answering Brief; Discussion re: Utkin attorney's withdrawal and removal of Utkin from SC case (TSB)	5.10	350.00	1,785.00	3,610.00
01/31/2019	Invoice	3784	Review	01/24/19 Review filing regarding removal of party, prepare analysis for response (ALB)	0.40	450.00	180.00	3,790.00
01/31/2019	Invoice	3784	Draft/Revise	01/31/19 Draft/revise Answering Brief and Opening Brief (TSB)	3.30	350.00	1,155.00	4,945.00
01/31/2019	Invoice	3784	Draft/Revise	01/30/19 Draft Opening Brief; Research cases and statutes (TSB)	1.50	350.00	525.00	5,470.00
01/31/2019	Invoice	3784	Draft/Revise	01/29/19 Begin draft of Opening Brief (TSB)	1.60	350.00	560.00	6,030.00
02/15/2019	Invoice	3835	Draft/Revise	02/01/19 Draft response and prepare for filing with NV Supreme Court (TSB)	0.60	350.00	210.00	6,240.00
02/15/2019	Invoice	3835	Review	02/13/19 Review Notice of Entry of Order filed by Kirschner; Review Notice of Appearance filed by Fred Waid (TSB)	0.10	350.00	35.00	6,275.00
02/28/2019	Invoice	3868	Meeting	02/15/19 Review court's order re: Jackie Utkin (TSB)	0.10	350.00	35.00	6,310.00
03/15/2019	Invoice	3908	Draft/Revise	03/11/19 Draft Answering Brief and Opening Brief on Cross-Claim (TSB)	2.70	350.00	945.00	7,255.00
03/29/2019	Invoice	3934	Review	03/20/19 Review and revise appellate brief (ZDH)	2.60	300.00	780.00	8,035.00
03/29/2019	Invoice	3934	Prepare	03/26/19 Prepare update to appellate brief (ALB)	1.60	450.00	720.00	8,755.00
03/29/2019	Invoice	3934	Review	03/21/19 Review file and appellate brief (ZDH)	2.00	300.00	600.00	9,355.00
03/29/2019	Invoice	3934	Review	03/18/19 Review appellate brief (ZDH)	1.30	300.00	390.00	9,745.00
03/29/2019	Invoice	3934	Meeting	03/26/19 Meeting, case discussion (.5); Review brief (.7) (ZDH)	1.20	300.00	360.00	10,105.00
03/29/2019	Invoice	3934	Review	03/27/19 Review Brief (ZDH)	0.50	300.00	150.00	10,255.00
03/29/2019	Invoice	3934	Draft/Revise	03/25/19 Telephone call to R. Geist; Draft/revise opening brief, Research appeal issues	7.20	350.00	2,520.00	12,775.00

DATE	TRANSACTION TYPE	NUM	PRODUCT/SERVICE	MEMO/DESCRIPTION	QTY	SALES PRICE	AMOUNT	BALANCE
03/29/2019	Invoice	3934	Draft/Revise	(TSB) 03/26/19 Compile appendices; Draft appendices; Research issues; Revise answering brief and opening brief; Telephone conversation with R. Geist re: no trustee delegation of authority (TSB)	6.80	350.00	2,380.00	15,155.00
03/29/2019	Invoice	3934	Draft/Revise	03/27/19 Finalize appendices; Finalize answering brief and opening brief; Prepare for filing with NV Supreme Court and for service (TSB)	6.40	350.00	2,240.00	17,395.00
03/29/2019	Invoice	3934	Draft/Revise	03/21/19 Draft and revise opening brief (ALB)	4.50	450.00	2,025.00	19,420.00
03/29/2019	Invoice	3934	Draft/Revise	03/19/19 Draft letter to R. Geist re: delegation of authority; Compile exhibits for appendices (TSB)	2.70	350.00	945.00	20,365.00
04/15/2019	Invoice	3991	Draft/Revise	03/28/19 Review filed documents; Prepare documents for service on J. Utkin; Draft email to J. Kirschner re: address for previous client (TSB)	0.30	350.00	105.00	20,470.00
<b>Total for Christian, Nancy</b>							<b>\$20,470.00</b>	
<b>TOTAL</b>							<b>\$20,470.00</b>	