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Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

JACQUELINE UTKIN, Successor Trustee to the
Christian Family Trust, Dated October 11, 2016

Petitioner

And

SUSAN CHRISTIAN-PAYNE, ROSEMARY
KEACH, RAYMOND CHRISTIAN, JR,
MONTE REASON, TOMMY L. CHRISTIAN,
CHRISTOPHER A. CHRISTIAN

Real Parties in Interest

v.

THE EIGHTH JUDICIAL DISTRICT COURT
OF THE STATE OF NEVADA,
IN AND FOR THE COUNTY OF CLARK AND
THE HONORABLE VINCENT OCHOA,

Respondents

Supreme Court No. 76053

District Ct. Case No: P-17-092512-T

**MOTION TO FILE VIDEO AS PART
OF APPENDIX**

MOTION TO FILE VIDEO AS PART OF APPENDIX

Comes Now, Petitioner Jacqueline Utkin, Successor Trustee to the Christian Family Trust
dated October 11, 2016 ("Petitioner"), by and through counsel, Jeremy Kirschner & Associates,
PLLC., and hereby files this MOTION TO FILE VIDEO AS PART OF APPENDIX ("Motion").

This Motion is made based on the following Memorandum of Points and Authorities, the exhibits thereto, the papers and pleadings already on file herein and any oral argument the Court may permit at a hearing of this matter.

MEMORANDUM OF POINTS AND AUTHORITIES

I. BRIEF STATEMENT OF FACTS AND PROCEDURAL HISTORY.

1. On June 1, 2018, the lower court entered an order pertaining to Petitioner and upon which review has been sought (“June 1st Order”).

2. The June 1st Order set a hearing for removal of Petitioner and appointment of an independent trustee for June 28, 2018.

3. On June 12, 2018, Petitioner filed her Petition for Writ of Mandamus or, in the Alternative, Writ Of Prohibition (“Petition for Writ”).

4. On June 12, 2018, Petitioner also filed her appendix comprised of two volumes (“Appendix”).

5. Item 16 to the appendix, referenced as 2 App. 302, is a video of a hearing held May 16, 2018 (“Video”) which is pertinent to the Petition for Writ.

6. The Video is approximately forty-five minutes and twenty-one (45:21) seconds long.

7. The Petition for Writ references the Video at various points, with exact timestamps for certain statements.

8. Time constraints made production of a transcript impractical, however Petitioner intends on supplementing the record when one becomes available.

III. ARGUMENT

The Video provides significant context which is crucial to the Petition for Writ. The Video also serves as a timely record given the temporal constraints of the Petition for Writ. Petitioner hereby requests permission to file the Video as item 16 to the appendix.

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II. CONCLUSION

Petitioner hereby requests permission to file the Video as item 16 to the appendix.

DATED this 14TH day of JUNE, 2018.

JERIMY KIRSCHNER & ASSOCIATES, PLLC

/s/Jerimy L. Kirschner, Esq.

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*Attorney for Petitioner Jacqueline Utkin,
Successor Trustee*

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing MOTION TO FILE VIDEO AS PART OF APPENDIX to be served by electronic means to those on record with the court as having consented to such, or by US Mail on this 14TH day of June:

The Honorable Judge Vincent Ochoa
Eighth Judicial District Court of
Clark County, Nevada
Regional Justice Center
200 Lewis Avenue
Las Vegas, Nevada 89155

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An Employee of Jerimy Kirschner & Associates, PLLC