

Steven D. Grierson

1 **SUPP**

2 LINDSEY LICARI

3 9564 SCORPION TRACK CT

4 LAS VEGAS, NV 89178

5 702-577-6657

6 LINDSEYLICARI14@AOL.COM

7 PLAINTIFF, LINDSEY LICARI, IN PROPER PERSON

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 LINDSEY LICARI, an individual,

11 Plaintiff,

12 v.

13 NIKKI SIKALIS BOTT, an individual;
14 NATIONAL TITLE CO., a Nevada
15 corporation; LINDA NAW, an individual.,
16 ERA BROKERS; a Nevada Corporation;
17 VALLEY WEST MORTGAGE, a Nevada
18 Corporation, DREW LEVY, an individual,
19 BOBBY ANTEE, an individual., ONE
20 REALTY GROUP; a Nevada Corporation;
21 MELISSA PARKER; an individual;
22 MELANIE TREANOR, an individual;
23 GREATER LAS VEGAS ASSOCIATION OF
24 REALTORS; a Nevada Corporation;
25 NEVADA REAL ESTATE DIVISION
BUSINESS AND INDUSTRY; a Nevada
Corporation; LINDA STRATTON, an
individual; INGRID TRUJILLO, an individual;
DARYL MCCLOSKEY; an individual;
VATCHE SAJIDIAN; an individual; CLARK
COUNTY RECORDERS OFFICE, a Nevada
Corporation; NEVADA SECRETARY OF
STATE OFFICE; a Nevada Corporation; LAS
VEGAS METROPOLITAN POLICE
DEPARTMENT; a Nevada Corporation
JENNINGS AND FULTON LTD, a Nevada
Corporation, SHUMWAY VAN LTD; a
Nevada Corporation; DOES I through X; and
ROE CORPORATIONS I through X, inclusive,

Defendants.

CASE NO.: A-20-820980-C

DEPT. NO.: 32

SUPPLEMENTAL MOTION TO
PLAINTIFF'S MOTION FOR QUIET
TITLE
AND
SUMMARY JUDGEMENT

1 PLAINTIFF, LINDSEY LICARI Hereby submits this SUPPLEMENTAL MOTION
2 for PLAINTIFF'S MOTION FOR QUIET TITLE AND SUMMARY JUDGEMENT. This
3 Supplemental Motion is based upon and supported by the following Memorandum of
4 Points and Authorities , the pleadings and papers on file with the Court, the attached
5 exhibits, and any argument the Court may allow at the time of the hearing.

6 *Lindsey Licari* (Signature)

7 LINDSEY LICARI

8 9564 SCORPION TRACK CT.

9 LAS VEGAS, NV 89178

7025776657

LINDSEYLICARI14@AOL.COM

Defendant LINDSEY LICARI, In Proper Person

10 **Memorandum of Points and Authorities**

11 1. Introduction

12 Ms. Licari submits this Supplemental Motion to inform the court of the continued
13 Mal Practice of Defendant Shumway Van in their continued representation of their
14 Co Defendants, Bobby Antee and Linda Naw. In June of 2018 Mr. Antee was
15 referred to Shumway Van by Defendant Linda Naw, to conceal her part in the
16 Mortgage Fraud of the purchase of 9564 Scorpion Track ct. Las Vegas, NV 89178. In
17 December 2018, Shumway Van and Garrett Chase submitted Respondent docs
18 submitted to GLVAR. Within that submission, Shumway Van and Garrett Chase
19 produced the documents that proved the Mortgage Fraud and false statements from
20 Defendants Linda Naw and Bobby Antee. Shumway Van, then knowingly filed
21 Defamation case against Ms. Licari, A-18-786141-C, when they had clear and
22 concise evidence that the Deed for 9564 Scorpion Track ct. Las Vegas, NV 89178
23 was not a vailed instrument, due to the forgery of the Deed. Ms. Licari was not
24 present at the closing, and did not consent to the purchase of the home, any debts, or
25

1 student loan payoffs. Shumway Van then continued to litigate the home along with
2 Jennings and Fulton for two years, while they tried to force Ms. Licari into a
3 settlement. When Ms. Licari refused to settle, Shumway Van and Jennings and Fulton
4 held a trial over a deed that was not even valid, putting Ms. Licari through 3 years of
5 litigation, to conceal the crimes of their clients Bobby Antee and Linda Naw. At
6 Trial, Shumway Van and Jennings and Fulton conspired together to remove Ms.
7 Licari's "Legal Separation Docs" filed in December of 2018 from the trial binder.
8 When Ms. Licari found out that her evidence was removed from the trial binder, she
9 then filed multiple motions to inform Rena Hughes of the fraud, to find out Rena
10 Hughes was also part of attempting to conceal the crimes of the Defendants. Ms.
11 Licari then filed Legal Malpractice against Shumway Van and Jennings and Fulton as
12 well as this complaint for Quiet Title. After being served Shumway Van has
13 continued to commit Legal Mal Practice by their continued representation for Mr.
14 Antee, and Ms. Naw in which they are co Defendants, imposing a clear conflict of
15 interest. Ms. Licari has also filed Legal Mal Practice case A-20-820446-C over the
16 representation in case D-18-573154-D, where Ms. Licari's evidence was removed,
17 and the constant harassment, and embezzlement from Shumway Van, Grayson
18 Moulton, and Garrett Chase. At trial for case D-18-573154-D Mr. Antee and
19 Shumway Van produced a fake tax bill, in which Ms. Licari has proven multiple
20 times was not valid and Shumway Van knowingly instructed Mr. Antee to commit
21 fraud by lying in court and allowing them to litigate a divorce, when Mr. Antee was
22 also part of committing fraud. Shumway Van has now also filed into this case,
23 representing Ms. Naw and Mr. Antee again, in which Mr. Antee can produce no
24 evidence of his ability to pay for legal services of this caliber. Shumway Van has also

1 filed into this case, without serving their motions on Ms. Licari, another great example
2 of the continued deceit of Defendants Shumway Van, Bobby Antee, and Linda Naw.
3 Defendant, Melanie Treanor also did not serve her Motion to Dismiss and in turn
4 should be thrown out. According to NRS 240.075 (1) (2) (3) Shumway Van must not
5 instruct their clients to commit fraud in which they have instructed them, and aided
6 them in doing so. At Divorce trial, and also can be confirmed in Rena Hughes ruling
7 that there was a tax debt for 2017 taxes, in which Rena Hughes fabricated her ruling
8 to state it was the sole responsibility of Ms. Licari, in which as Ms. Licari testified at
9 trial, it was not valid and she could not confirm the debt with the IRS. Ms. Licari also
10 received tax returns 2018 and 2019 so again confirms there was no IRS debt on her
11 behalf. It was another attempt to commit fraud and Mr. Antee submitted it to the court
12 to deceive. Ms. Licari has confirmed there is no debt and would like the court to take
13 their actions, dishonesty, and continued deception into account when granting the
14 Plaintiff's Motion for Summary Judgement and Quiet Title.

15 2. Conclusion

16 Ms. Licari's life has been controlled and manipulated by Shumway Van, Jennings and
17 Fulton, Bobby Antee, Linda Naw, and Rena Hughes for 3 years over a instrument that
18 was clearly not valid. Shumway Van and Jennings and Fulton knowingly litigated a
19 divorce that they had clear evidence was mortgage fraud. Shumway Van and Bobby
20 Antee produced a fake tax bill to the court to defraud and damage the credibility of
21 Ms. Licari. Shumway Van after being served with a Summons on this same case,
22 have continued to litigate on the behalf of Defendants, Linda Naw and Bobby Antee.
23 Ms. Licari has attached proof that Shumway Van filed into this case and refused to
24 serve Ms. Licari with the motions filed on the behalf of their clients. Ms. Licari asks

1 the court to enforce that Mr. Antee and Ms. Naw provide proof of payments made to
2 Shumway Van, as Mr. Antee makes \$14hr and hasn't worked from March until
3 September, and with Child Support, and his Car Payment could in no way afford an
4 attorney for 3 years. Shumway Van is still on case D-18-573154-D in which it has
5 now been sent to appeal, in which I should have never went to trial, this was a simple
6 annulment. Ms. Licari has been forced to stay living in the martial home, with no
7 access to the Mortgage, HOA, trash, and is still not listed on the homeowners
8 insurance held by Defendant Valley West Mortgage. Mr. Antee admitted to lying on
9 underwriting paperwork and continues to lie about every part of this transaction, yet
10 he was the one person who was supposed to protect Ms. Licari. Ms. Licari, over the
11 last 3 years has suffered daily because of the actions of the defendants, in which they
12 continue to commit Legal Malpractice in every filing they complete. All Defendants
13 in this case had the opportunity to do the right thing, and they all chose to protect
14 ERA Brokers and National Title Company at the cost of Ms. Licari. When Ms. Licari
15 refused to settle with ERA Brokers and National Title Company, Rena Hughes
16 simply fabricated her ruling and is now trying to force the sale of the home before this
17 court can hear he case. Ms. Licari has now been forced to litigate on her own behalf,
18 taking time away from her work. Since June 2020, Ms. Licari has had to file over 30
19 motions, taking up 20-30 hours a week, while Jennings and Fulton did nothing to
20 rectify the disaster they created. Ms. Licari asks that this court swiftly hold all
21 accountable, Quiet Title, and allow Ms. Licari to help the children of our community
22 in peace.

Exhibits

1. Mr. Antee Pay Stubs
2. Proof Mr. Antee and Shumway Van and Rena Hughes lied about IRS Debt
3. Proof Shumway Van Didn't serve Ms. Licari
4. Register of Actions to Prove Legal Malpractice
5. Affidavits of Service
6. Respondent Docs Submitted by Shumway Van

CERTIFICATE OF SERVICE

Pursuant to N.R.C.P. 5(b), I hereby certify that I am Plaintiff, Lindsey Licari in proper person, and that on the 21st day of OCTOBER, 2020, I caused a true and correct copy of the foregoing **PLAINTIFFS SUPPLEMENTAL MOTION FOR SUMMARY JUDGEMENT AND QUIET TITLE**

to be served as follows:

_____ by depositing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, enclosed in a sealed envelope; or

_____ by facsimile transmission, pursuant to E.D.C.R. 7.26, as indicated below; or

 X by electronic service, pursuant to N.E.F.C.R. 9 and Administrative Order 14-2, as indicated below:

DATED this 21 day of October, 2020.

Pursuant to NRS 53.045, I declare under penalty of perjury that the foregoing is true and correct.

MICHAEL C. VAN, ESQ.
Nevada Bar No. 3876
GARRETT R. CHASE, ESQ.
Nevada Bar No. 14498
SHUMWAY VAN
8985 S. Eastern Avenue, Suite 100

1 Ph: (702) 478-7770
2 Fax: (702) 478-7779
3 michael@shumwayvan.com
4 garrett@shumwayvan.com
5 Attorneys for Defendant

6 Pursuant to NRS 53.045, I declare under penalty of
7 perjury that the foregoing is true and correct.

8 *Lindsey Licari* (Signature)

9 LINDSEY LICARI

10 9564 SCORPION TRACK CT.

11 LAS VEGAS, NV 89178

12 7025776657

13 LINDSEYLICARI14@AOL.COM

14 Defendant LINDSEY LICARI, In Proper Person

Exhibit 1



Company Information	
Name	Address
Vdara Condo Hotel	3950 Las Vegas Blvd South Las Vegas, NV 89119 United States of America

Payslip Information					
Name	Employee ID	Pay Period Begin	Pay Period End	Check Date	Check Number
Bobby Antee		10/22/2018	11/04/2018	11/09/2018	

Current and YTD Totals					
Balance Period	Gross Pay	Post Tax Deductions	Taxes	Pre Tax Deductions	Net Pay
Current	1,206.98	368.34	246.52	0.00	592.12
YTD	26,277.62	7,234.83	5,344.44	0.00	13,698.35

Earnings					
Description	Dates	Hours	Rate	Amount	YTD
Tip Reported	10/22/2018 - 11/04/2018	0.00	0.00	171.76	3,475.82
Regular	10/22/2018 - 11/04/2018	80.00	14.4022	1,152.18	22,391.31
Overtime 1.5	10/22/2018 - 11/04/2018	0.28	14.4022	6.05	72.38
Tips - Distributed	10/22/2018 - 11/04/2018	0.00	0.00	48.75	1,122.95
Holiday Worked 2.0					1,098.82
Floating Holiday					224.48
Holiday Overtime 2.5					8.86
Vacation					1,358.82
Total:				1,378.74	29,753.44

Taxes		
Description	Amount	YTD
OASDI	85.48	1,844.71
Medicare	20.00	431.43
Federal Withholding	141.04	3,068.30
Total:	246.52	5,344.44

Post Tax Deductions		
Description	Amount	YTD
Badge/Card		5.00
Dues - Culinary	49.50	544.50
Support (250631000A-01)	27.69	609.18
Support (250631000A)	280.15	5,883.15
IWO Agency Fee (250631000A)	4.00	84.00
IWO Employer Fee	3.00	63.00
Foundation One Time	2.00	2.00
Foundation Ongoing	2.00	44.00
Total:	368.34	7,234.83

Subject or Taxable Wages



Description	Amount	YTD
OASDI - Taxable Wages	1,206.98	26,277.62
OASDI Tip Tax - Taxable Wages	171.76	3,475.82
Medicare - Taxable Wages	1,378.74	29,753.44
Federal Withholding - Taxable Wages	1,378.74	29,753.44

Withholding

Description	Federal	Work State
Marital Status	Single	
Allowances	0	0
Additional Withholding	0	

Payment Information

Bank	Account Name	Account Number	Amount in Pay Group Currency	Pay Group Currency
GE capitol bank	GE capitol bank *****8760	*****8760	592.12	USD
Total:			592.12	

Exhibit 2

CINCINNATI OH 45999-0059

In reply refer to: 0297884155
Oct. 19, 2020 LTR 3657C 0
530-88-1242 201712 30 c
00013543
BODC: WI

BOBBY D ANTEE
9564 SCORPION TRACK CT
LAS VEGAS NV 89178-6247



018554

Social security number: 530-88-1242

Form: 8857

Tax years: 2017

Contact person: Ms. Noble
Employee identification number: 1003096388
Contact telephone number: 855-851-2009
Fax: 855-233-8558

Dear Taxpayer:

This is a copy of a letter we sent to the taxpayer named above. We are sending it to you because you filed a joint return with that taxpayer for the tax period shown.

We received your Form 8857, Request for Innocent Spouse Relief. You don't meet the basic eligibility requirements.

Our records show no amount is currently owed and no additional assessments for tax years 2017.

In the future, if you're contacted regarding any changes to your return that'll result in a balance due, you can re-file Form 8857, Request for Innocent Spouse Relief, at that time.

The amount listed on your CP2000 is a proposed amount due. This amount has not actually been assessed and billed to your account. Once the balance is assessed, you may re-file the Form 8857.

You can do the following to get additional information:

- Review Publication 971, Innocent Spouse Relief, for more information about filing an innocent spouse claim.
- You can get the forms or publications mentioned in this letter by visiting our website at www.irs.gov/forms-pubs or by calling 800-TAX-FORM (800-829-3676).
- Contact us at the phone number shown on the first page of this letter between 7:30 a.m. and 3:30 p.m. EST, Mon - Fri., or

Exhibit 3

Court Documents - Case No. A-20-820980-C

Marina Scott <marinas@shumwayvan.com>

Wed 10/21/2020 10:41 AM

To: IINDSEYLICARI14@AOL.COM <IINDSEYLICARI14@AOL.COM>; Lindsey Licari <lindsey@aydensarmyofangels.org>

Cc: Grayson Moulton <Grayson@shumwayvan.com>; Garrett R. Chase <Garrett@shumwayvan.com>; Margaret Manning <MManning@shumwayvan.com>; Paula Lamprea <paulal@shumwayvan.com>

 4 attachments (2 MB)

NAW.LICARI.PLD.201009.D_MOTION TO DECL P_VIX LIT AND DISSMS CMPLT.pdf; NAW.LICARI.PLD.201015.IAFD_NAW.pdf; ANTEE.LICARI.PLD.201001.D_ANTEE_MOT DCLR P_VXATIOUS_LIT AND DSMS CMPLT.pdf; ANTEE.LICARI.PLD.201015.IAFD_ANTEE.pdf;

Dear Ms. Licari,

Please be advised that the attached documents were served to you via Certified Return USPS Mail. This e-mail was sent, with attached documents, as a courtesy notification.

Marina Scott, Legal Assistant

SHUMWAY • VAN

ATTORNEYS AT LAW

8985 S Eastern Ave

Suite 100

Las Vegas, NV 89123

Main: (702) 478-7770

Direct: (702) 570-6778

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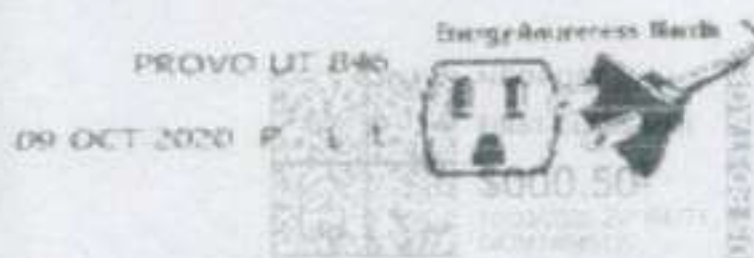
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Clarkson & Associates, LLC
ATTORNEYS AT LAW

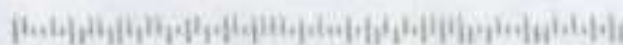
162 North 400 East, Suite A-204 • PO Box 1630 • St. George, UT 84771

Address Service Requested



Lindsey Licari
9564 Scorpion Track Ct.
Las Vegas, NV 89178

8917816247





Clarkson & Associates, LLC
ATTORNEYS AT LAW

182 North 400 East, Suite A-204 • P.O. Box 1630 • St. George, UT 84771



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CA2M14548327

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9517848247 H303



Department of
Veterans Affairs



Department of
Veterans Affairs
EVIDENCE INTAKE CENTER
PO BOX 4444

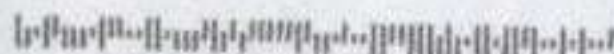
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Penalty for private use \$300

LARRY A BRADLEY
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LAS VEGAS NV 89178

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DEPARTMENT OF VETERANS AFFAIRS

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HNDONP1 89178



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NORWOOD, MA 02062-0400

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LAS VEGAS NV 89178-8247



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Anthem. 

3075 Vandercar Way
Cincinnati, OH 45209

IMPORTANT HEALTH BENEFITS UPDATE

307545209

J154985-E-019023 48

Annie Cornwall
9564 Scorpion Track Ct
Las Vegas, NV 89178-6247

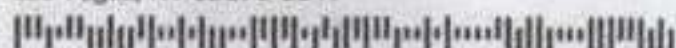


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Bobby Antee
9564 Scorpion Track Ct
Las Vegas, NV 89178-6247



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To Open - Fold and Tear Along Perforation

See Reverse Side For Easy Opening Instructions



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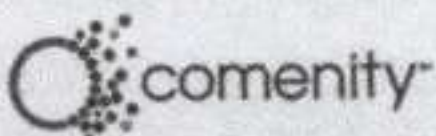
Re: Valley West Mortgage



0007027 1000014 P *****ALL FOR AADC 890

Bobby Antee
9564 Scorpion Track Ct
Las Vegas, NV 89178-6247

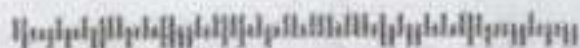
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Valley View Home Loans is not affiliated with or authorized by Valley West Mortgage.
This solicitation is not authorized by Valley West Mortgage, and your loan information
was not provided to Valley View Home Loans by Valley West Mortgage.



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LINDSEY LICARI
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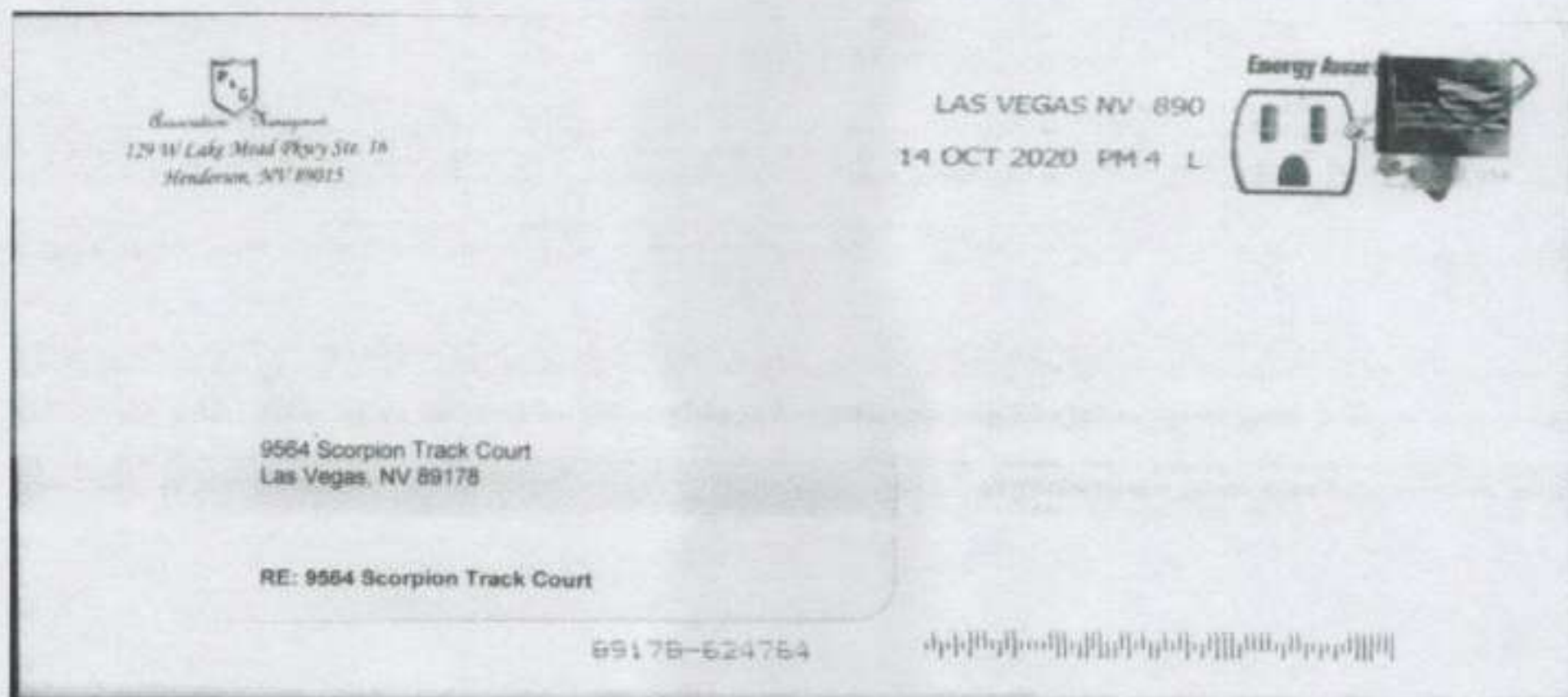


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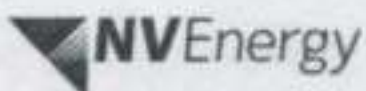


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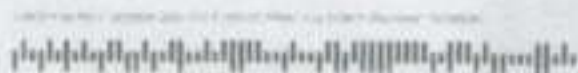
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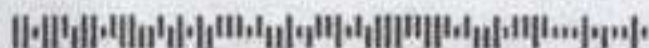
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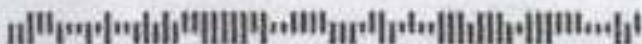
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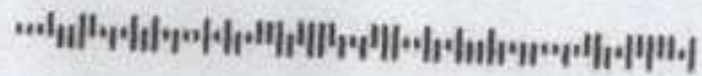

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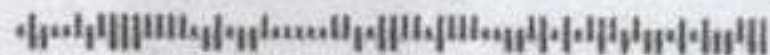
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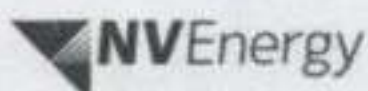


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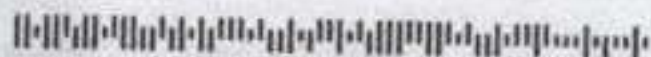
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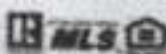
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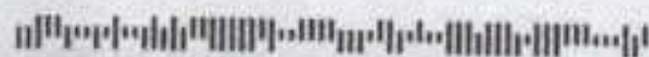
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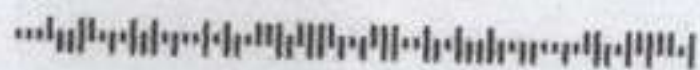

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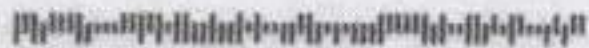
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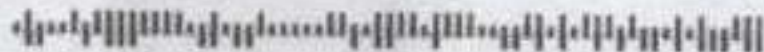
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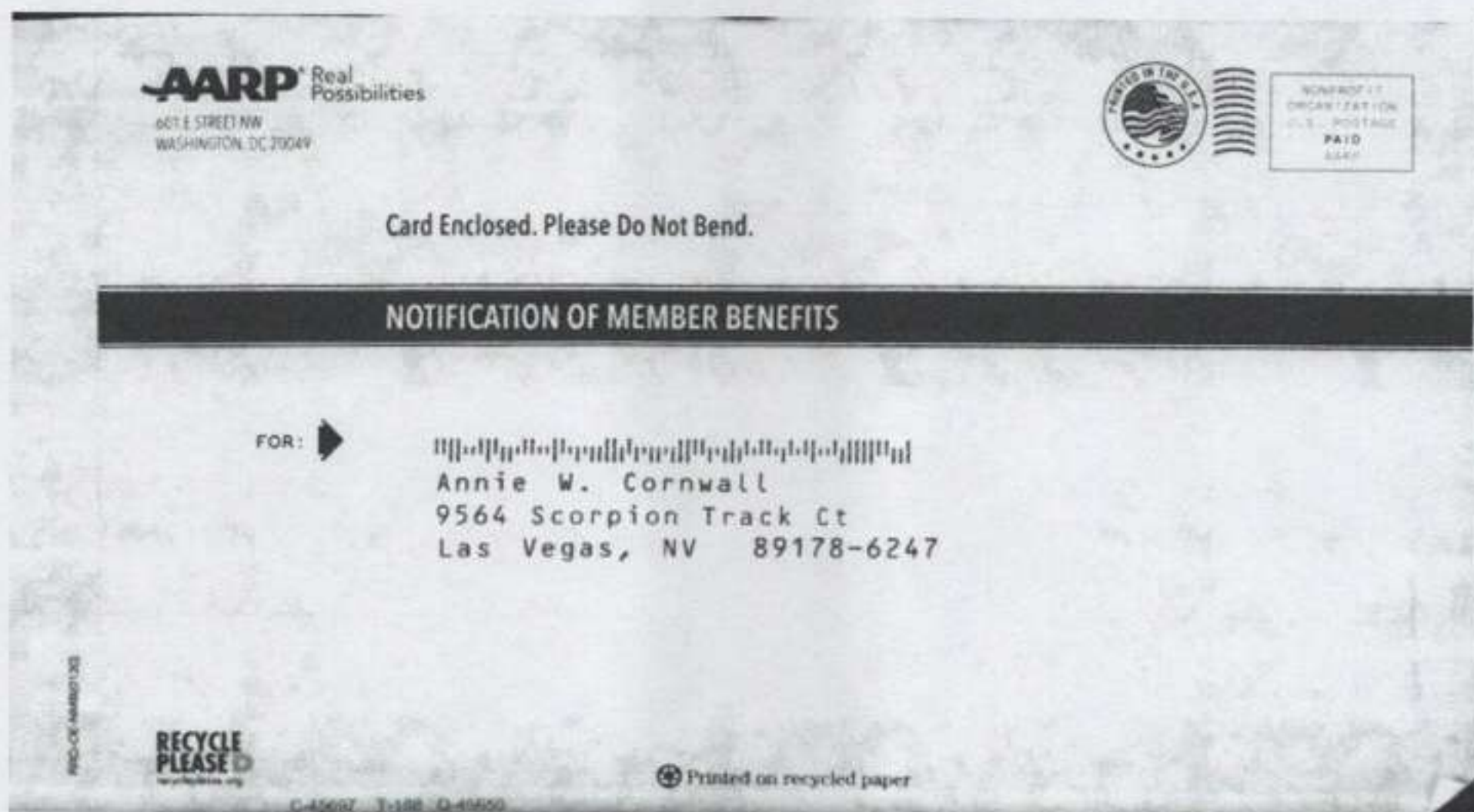


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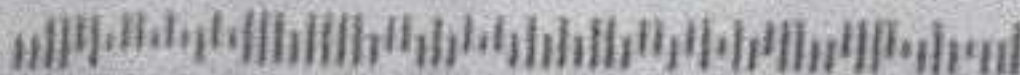
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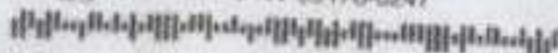
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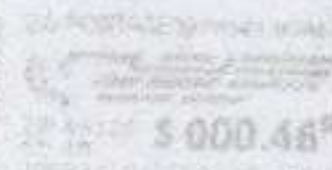
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From: USPSInformedDelivery@usps.gov,

To: lindseylicari14@aol.com,

Subject: Informed Delivery Daily Digest

Date: Mon, Oct 19, 2020 9:08 am

Attachments:

You have mail and packages arriving soon:

10/19/2020

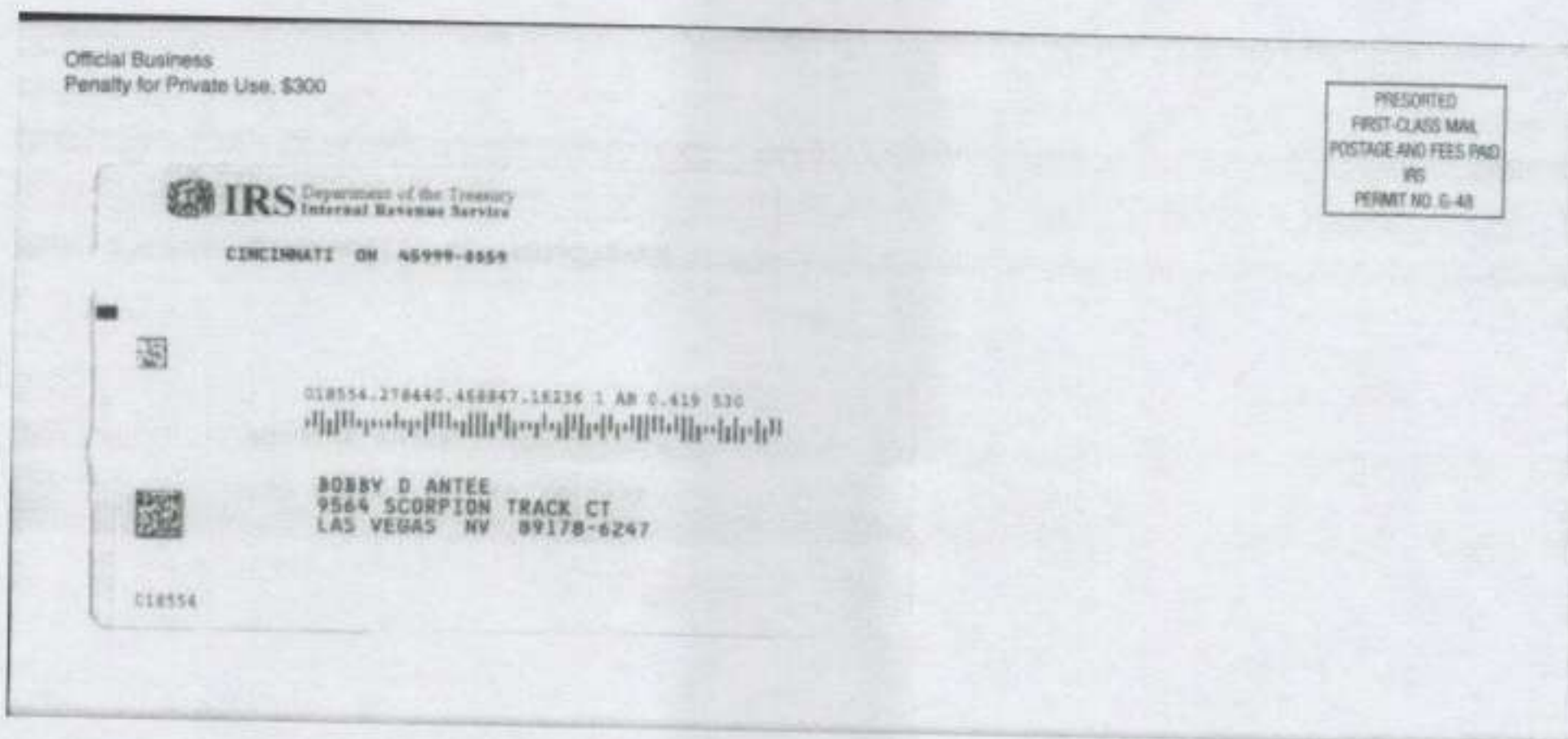


COMING TO YOUR MAILBOX SOON.



MAIL

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HSBC Bank USA, N.A.
PO BOX 9, BUFFALO, NY 14240



U.S. POSTAGE
FIRST CLASS
NO. 1000.50⁰

LINDSEY LICARI
9584 SCORPION TRACK CT
LAS VEGAS, NV 89178

891786247 H309



VEHICLE ALERT NOTICE

****Please Respond within 5 Business Days****

Customer ID No.

DLRe68667265

Owner:

Larry Bradley

Vehicle:

Volvo

Deadline:

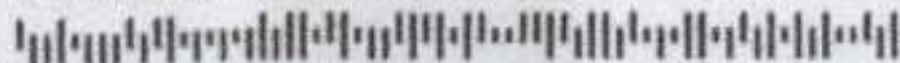
10/23/2020

PRST FIRST-CLASS
U.S. POSTAGE
PAID
ST. LOUIS, MO
PERMIT NO. 462

IMPORTANT INFORMATION ABOUT YOUR VEHICLE
Your Immediate Attention is Required

*P3*T19**12682*****ALL FOR AADC 890

Larry Bradley
9564 Scorpion Track Ct
Las Vegas, NV 89178-6247



MOTOR VEHICLE NOTIFICATION

PERMIT FIRST CLASS
U.S. POSTAGE
PAID
ASTORIA, OR
PERMIT #801

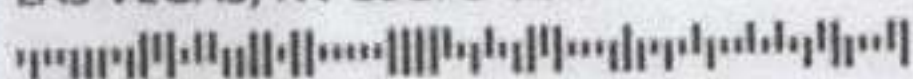
CUSTOMER ID# 288DW01201	YEAR / MAKE / MODEL 2017 VOLVO S SERIES	DEADLINE DATE 11/04/2020
----------------------------	--	-----------------------------

PLEASE CALL
NOW
1-888-582-6870
MONDAY-FRIDAY
7:00 am - 7:00 pm CST
SATURDAY
9:00 am - 4:00 pm CST



*****AUTO**ALL FOR AADC 890

Larry Bradley
9564 SCORPION TRACK CT
LAS VEGAS, NV 89178-6247



019237-288DW-20201008BA

GEICO

One GEICO Plaza
Washington, DC 20076-0001

PERMIT STD
U.S. POSTAGE
PAID
GEICO

Who doesn't love...

Roberta Licari
9564 Scorpion Track Ct
Las Vegas, NV 89178-6247



EASY MONEY?

(Go ahead, look inside.)



PACKAGES

[View all packages on dashboard](#)

Arriving Today

Monday, Oct 19

%RIDEALONGPACK% %RIDEALONGPACK%

9590940256899346700845

9590940256899346700852

Arriving Soon

No packages available to display.

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To: lindseylicari14@aol.com,

Subject: Informed Delivery Daily Digest

Date: Tue, Oct 20, 2020 9:33 am

Attachments:

You have mail and packages arriving soon.

10/20/2020

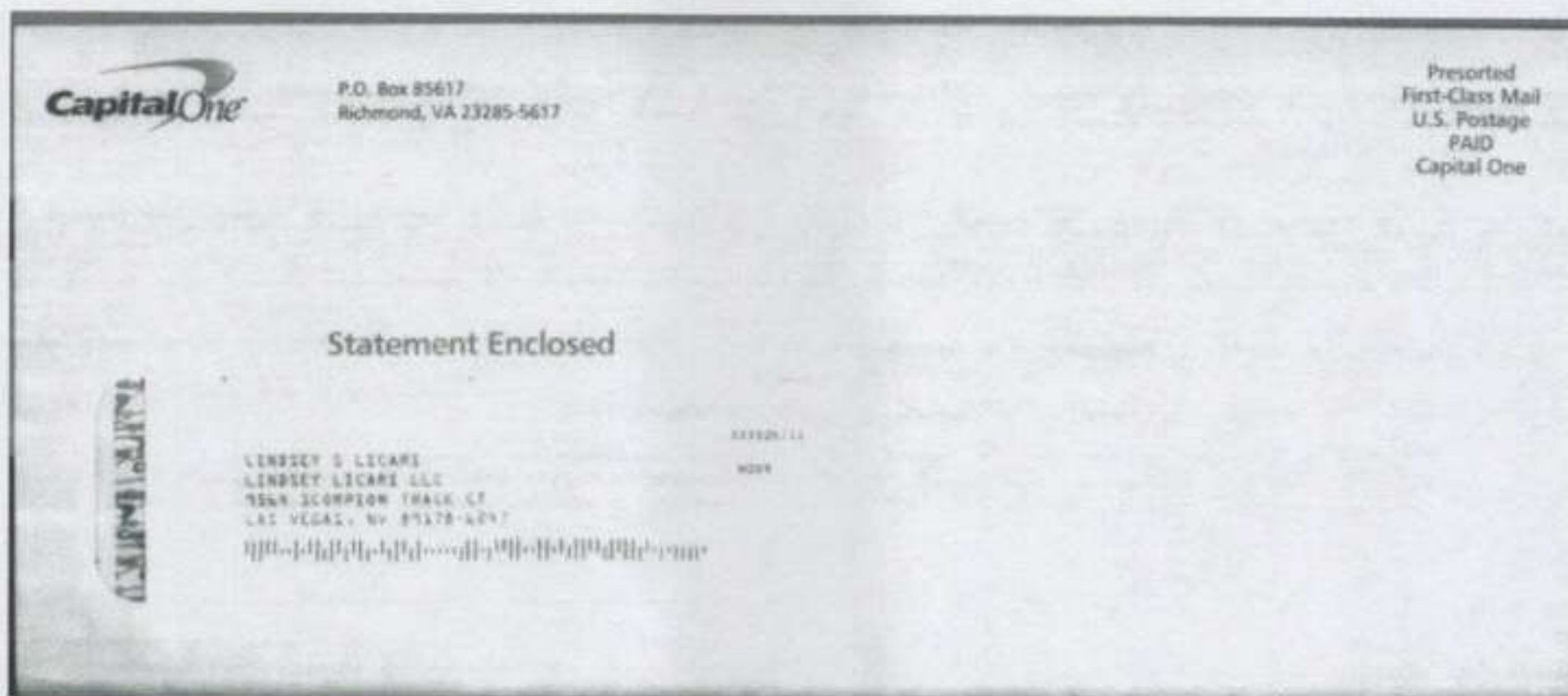


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MAIL

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PACKAGES

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No packages available to display.

Arriving Soon

%RIDEALONGPACK% %RIDEALONGPACK%

9590940256899346618751

Estimated Delivery on: Thursday, Oct 22

9590940256899346618775

Estimated Delivery on: Thursday, Oct 22

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9590940256899346618775

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To: lindseylicari14@aol.com,

Subject: Informed Delivery Daily Digest

Date: Wed, Oct 21, 2020 9:26 am

Attachments:

You have mail and packages arriving soon.

10/21/2020

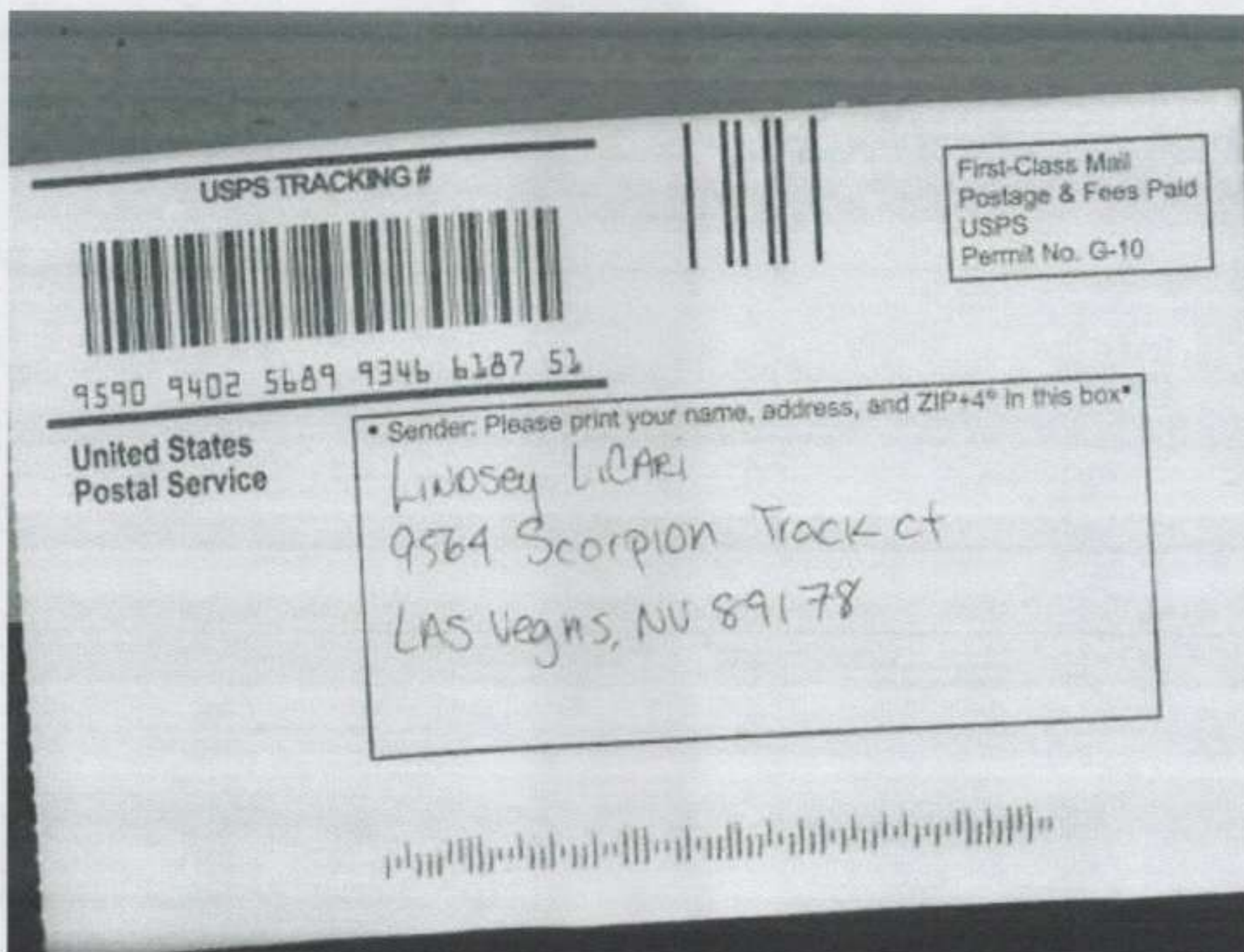


COMING TO YOUR MAILBOX SOON.

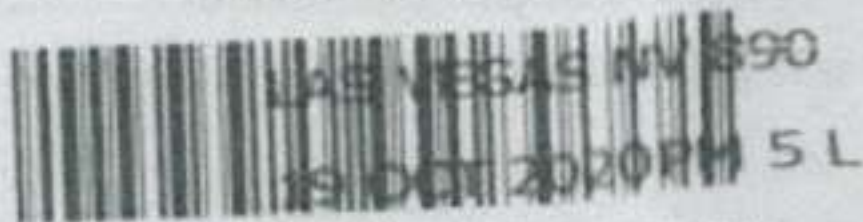


MAIL

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USPS TRACKING #



LAS VEGAS NV 890

19 OCT 2020 PM 5 L

9590 9402 5689 9346 6187 75

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box •

LINDSEY LICARI

9564 SCORPION TRACK CT
LAS VEGAS, NV 89178

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10



**Mailpieces that we do
not have an image for are
included in today's mail.**



PACKAGES

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Arriving Today

Wednesday, Oct 21

No packages available to display.

Arriving Soon

%RIDEALONGPACK% %RIDEALONGPACK%

9590940256899346618751

Estimated Delivery on: Thursday, Oct 22

9590940256899346618775

Estimated Delivery on: Thursday, Oct 22

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Exhibit 4

CASE No. A-20-820980-C

Case Type: **Other Title to Property**
Date Filed: **09/10/2020**
Location: **Department 32**
Case Number: **A820980**

Cross-Reference Case Number: **A820980**

Lead Attorneys

Pro Se

[illegible]

	<i>Summons</i>
9/10/2020	Summons Electronically Issued - Service Pending <i>Summons</i>
9/10/2020	Summons Electronically Issued - Service Pending <i>Summons</i>
9/10/2020	Summons Electronically Issued - Service Pending <i>Summons</i>
9/10/2020	Summons Electronically Issued - Service Pending <i>Summons</i>
9/10/2020	Summons Electronically Issued - Service Pending <i>Summons</i>
9/10/2020	Summons Electronically Issued - Service Pending <i>Summons</i>
9/12/2020	Summons Electronically Issued - Service Pending <i>Summons</i>
9/12/2020	Summons Electronically Issued - Service Pending <i>Summons</i>
9/15/2020	Clerk's Notice of Nonconforming Document <i>Clerk's Notice of Nonconforming Document</i>
9/18/2020	Clerk's Notice of Nonconforming Document and Curative Action <i>Clerk's Notice of Curative Action</i>
9/19/2020	Notice of Lis Pendens <i>Lis Pendens</i>
9/19/2020	Affidavit of Service <i>linda naw served</i>
9/19/2020	Affidavit of Service <i>ERA Brokers</i>
9/19/2020	Affidavit of Service <i>national title</i>
9/19/2020	Affidavit of Service <i>Nikki Bott</i>
9/21/2020	Affidavit of Service <i>Bobby Antee</i>
9/23/2020	Amended <i>COMPLAINT</i>
9/23/2020	Amended <i>Notice of Lis Pendens</i>
9/23/2020	Summons Electronically Issued - Service Pending <i>JENNINGS AND FULTON LTD</i>
9/23/2020	Complaint <i>Complaint Exempt from Arbitration (Amount in Controversy is Over \$50,000) (Amended)</i>
9/23/2020	Summons Electronically Issued - Service Pending <i>SHUMWAY VAN</i>
9/23/2020	Summons Electronically Issued - Service Pending <i>LVMPD</i>
9/23/2020	Summons Electronically Issued - Service Pending <i>sos</i>
9/23/2020	Summons Electronically Issued - Service Pending <i>ccr</i>
9/29/2020	Affidavit of Service <i>One Realty</i>
10/01/2020	Affidavit of Service <i>Clark County Recorder</i>
10/01/2020	Affidavit of Service <i>JENNINGS AND FULTON LTD</i>
10/01/2020	Affidavit of Service <i>SHUMWAY VAN</i>
10/04/2020	Affidavit of Service <i>Melissa Parker</i>
10/04/2020	Affidavit of Service <i>Vatche</i>
10/04/2020	Affidavit of Service <i>Daryl McClosky</i>
10/04/2020	Affidavit of Service <i>VALLEY WEST</i>
10/04/2020	Affidavit of Service <i>Ingrid Trujillo</i>
10/04/2020	Affidavit of Service <i>LVMPD</i>
10/04/2020	Affidavit of Service <i>GLVAR</i>
10/04/2020	Affidavit of Service <i>Melanie Treanor</i>
10/05/2020	Motion <i>Motion to Enforce Payout of Notary Bonds of Nikki-Sikalas Bott and Melanie Treanor</i>
10/05/2020	Answer to Complaint <i>Defendant(s), Melanie Treanor, Pro Se, Hereby Submits This Answer to the Complaint on File Herein, and Alleges and Avers as Follows:</i>
10/07/2020	Filing Fee Remittance <i>response to palintiff</i>
10/07/2020	Clerk's Notice of Nonconforming Document <i>Clerk's Notice of Nonconforming Document</i>
10/08/2020	Clerk's Notice of Nonconforming Document and Curative Action <i>Clerk's Notice of Curative Action</i>
10/08/2020	Clerk's Notice of Hearing <i>Notice of Hearing</i>
10/09/2020	Motion to Dismiss

3/09/2020	<i>Notice of Hearing</i> Certificate of Service <i>Certificate of Service</i>
3/09/2020	Motion to Dismiss <i>Defendant Linda Naw's Motion to Declare Lindsey Licari a Vexatious Litigant and Dismiss the Complaint or in the Alternative Motion to Stay</i>
3/09/2020	Motion to Dismiss <i>Defendant Bobby Antee's Motion to Declare Lindsey Licari a Vexatious Litigant and Dismiss the Complaint, or in the Alternative Motion to Stay</i>
3/12/2020	Clerk's Notice of Hearing <i>Notice of Hearing</i>
3/12/2020	Motion <i>Defendants Greater Las Vegas Association of Realtors and Ingrid Trujillo s Motion To Dismiss Plaintiff s First Amended Complaint; Motion To Strike Plaintiff s Second Amended Complaint</i>
3/12/2020	Initial Appearance Fee Disclosure <i>Defendants Greater Las Vegas Association of Realtors and Ingrid Trujillo's Initial Appearance Fee Disclosure (NRS Chapter 19)</i>
3/13/2020	Clerk's Notice of Hearing <i>Notice of Hearing</i>
3/14/2020	Initial Appearance Fee Disclosure <i>Initial Appearance Fee Disclosure</i>
3/14/2020	Answer <i>Answer to Plaintiff's Amended Complaint</i>
3/14/2020	Opposition and Countermotion <i>Opposition to Defendant ERA Brokers Motion to Dismiss Pursuant to NRCP 12(B)(5) and Defendant Lindanaw's Motion to Declare Lindsey Licari a Vexatious Litigant and Dismiss the Complaint or in the Alternative Motion to Say and Defendant Bobby Antee's Motion to Declare Lindsey Licari a Vexatious Litigant and Dismiss the Complaint, or in the Alternative Motion to Stay and Defendant Greater Las Vegas Association of Realtors and Ingrid Trujillo Motion to Dismiss Plaintiff's First Amended Complaint, or in the Alternative Motion to Stay and Defendant's Greater Las Vegas Association of Realtors and Ingrid Trujillo's Motion to Dismiss Plaintiff's First Amended Complaint; Motion to Strike Plaintiff's Second Amended Complaint and Plaintiff's Motion for Quiet Title and Plaintiff's Motion for Summary Judgment</i>
3/14/2020	Exhibits <i>Quiet Title</i>
3/14/2020	Supplement <i>Supplemental Exhibits for Opposition to Defendant Era Brokers Motion to Dismiss Pursuant to NRCP 12 (B) (5)</i>
3/14/2020	Exhibits <i>Exhibits</i>
3/14/2020	Exhibits <i>Quiet Title</i>
3/15/2020	Initial Appearance Fee Disclosure <i>Initial Appearance Fee Disclosure - Naw</i>
3/15/2020	Initial Appearance Fee Disclosure <i>Initial Appearance Fee Disclosure - Antee</i>
3/15/2020	Filing Fee Remittance <i>Summary Judgement</i>
3/20/2020	Initial Appearance Fee Disclosure <i>Initial Appearance Fee Disclosure</i>
3/20/2020	Opposition to Motion <i>Defendants National Title Co. and Nikki Sikalis Bott's Opposition to the Motion to Enforce Payout</i>
3/17/2020	Motion (9:30 AM) (Judicial Officer Bare, Rob) <i>Motion to Enforce Payout of Notary Bonds of Nikki-Sikalís Bott and Melanie Treanor</i>
3/17/2020	Motion to Dismiss (9:30 AM) (Judicial Officer Bare, Rob) <i>Defendants Era Brokers Motion To Dismiss Pursuant To Nrcp 12(B)(5)</i>
3/17/2020	Motion to Dismiss (9:30 AM) (Judicial Officer Bare, Rob) <i>Defendant Linda Naw's Motion to Declare Lindsey Licari a Vexatious Litigant and Dismiss the Complaint or in the Alternative Motion to Stay</i>
3/17/2020	Motion to Dismiss (9:30 AM) (Judicial Officer Bare, Rob) <i>Defendant Bobby Antee's Motion to Declare Lindsey Licari a Vexatious Litigant and Dismiss the Complaint, or in the Alternative Motion to Stay</i>
3/17/2020	Motion to Dismiss (9:30 AM) (Judicial Officer Bare, Rob) <i>Defendants Greater Las Vegas Association of Realtors and Ingrid Trujillo s Motion To Dismiss Plaintiff s First Amended Complaint; Motion To Strike Plaintiff s Second Amended Complaint</i>
3/17/2020	Opposition and Countermotion (9:30 AM) (Judicial Officer Bare, Rob) <i>Plaintiff's Opposition to Defendant ERA Brokers Motion to Dismiss Pursuant to NRCP 12(B)(5) and Defendant Lindanaw's Motion to Declare Lindsey Licari a Vexatious Litigant and Dismiss the Complaint or in the Alternative Motion to Say and Defendant Bobby Antee's Motion to Declare Lindsey Licari a Vexatious Litigant and Dismiss the Complaint, or in the Alternative Motion to Stay and Defendant Greater Las Vegas Association of Realtors and Ingrid Trujillo Motion to Dismiss Plaintiff's First Amended Complaint, or in the Alternative Motion to Stay and Defendant's Greater Las Vegas Association of Realtors and Ingrid Trujillo's Motion to Dismiss Plaintiff's First Amended Complaint; Motion to Strike Plaintiff's Second Amended Complaint and Plaintiff's Motion for Quiet Title and Plaintiff's Motion for Summary Judgment</i>

FINANCIAL INFORMATION

	Defendant Antee, Bobby		
	Total Financial Assessment		223.0
	Total Payments and Credits		223.0
	Balance Due as of 10/21/2020		0.0
3/15/2020	Transaction Assessment		223.0
3/15/2020	Efile Payment	Receipt # 2020-58162-CCCLK	Antee, Bobby (223.0)
	Defendant ERA Brokers		
	Total Financial Assessment		223.0
	Total Payments and Credits		0.0
	Balance Due as of 10/21/2020		223.0
3/09/2020	Transaction Assessment		223.0

		Defendant Greater Las Vegas Association of Realtor		
		Total Financial Assessment		253.
		Total Payments and Credits		253.
		Balance Due as of 10/21/2020		0.
3/12/2020	Transaction Assessment			253.
3/12/2020	Efile Payment	Receipt # 2020-57362-CCCLK	Greater Las Vegas Association of Realtor	(253.)
		Defendant National Title Company		
		Total Financial Assessment		253.
		Total Payments and Credits		253.
		Balance Due as of 10/21/2020		0.
3/20/2020	Transaction Assessment			253.
3/20/2020	Efile Payment	Receipt # 2020-59079-CCCLK	National Title Company	(253.)
		Defendant Naw-Perdue, Linda		
		Total Financial Assessment		223.
		Total Payments and Credits		223.
		Balance Due as of 10/21/2020		0.
3/15/2020	Transaction Assessment			223.
3/15/2020	Efile Payment	Receipt # 2020-58160-CCCLK	Naw-Perdue, Linda	(223.)
		Defendant Treanor, Melanie		
		Total Financial Assessment		223.
		Total Payments and Credits		223.
		Balance Due as of 10/21/2020		0.
3/07/2020	Transaction Assessment			223.
3/07/2020	Efile Payment	Receipt # 2020-56218-CCCLK	Treanor, Melanie	(223.)
		Defendant Valley West Mortgage		
		Total Financial Assessment		253.
		Total Payments and Credits		253.
		Balance Due as of 10/21/2020		0.
3/14/2020	Transaction Assessment			253.
3/14/2020	Efile Payment	Receipt # 2020-57785-CCCLK	Valley West Mortgage	(253.)
		Plaintiff Licari, Lindsey S		
		Total Financial Assessment		470.
		Total Payments and Credits		470.
		Balance Due as of 10/21/2020		0.
9/11/2020	Transaction Assessment			270.
9/11/2020	Efile Payment	Receipt # 2020-50845-CCCLK	Licari, Lindsey S	(270.)
3/15/2020	Transaction Assessment			200.
3/15/2020	Efile Payment	Receipt # 2020-58253-CCCLK	Licari, Lindsey S	(200.)

REGISTER OF ACTIONS

CASE No. A-18-786141-C

Linda Perdue, Plaintiff(s) vs. Lindsey Licari, Defendant(s)		Case Type: Intentional Misconduct Date Filed: 12/17/2018 Location: Department 18 Cross-Reference Case Number: A786141
---	--	--

PARTY INFORMATION		
Counter Plaintiff	Licari, Lindsey <i>Also Known As</i> Antee, Lindsey	Lead Attorneys Jared B. Jennings <i>Retained</i> 702-979-3565(W)
Counter Defendant	Naw Real Estate Inc	Michael C. Van <i>Retained</i> 702-478-7770(W)
Counter Defendant	Perdue, Linda <i>Also Known As</i> Naw, Linda	Michael C. Van <i>Retained</i> 702-478-7770(W)
Defendant	Licari, Lindsey <i>Also Known As</i> Antee, Lindsey	Jared B. Jennings <i>Retained</i> 702-979-3565(W)
Plaintiff	Naw Real Estate Inc	Michael C. Van <i>Retained</i> 702-478-7770(W)
Plaintiff	Perdue, Linda <i>Also Known As</i> Naw, Linda	Michael C. Van <i>Retained</i> 702-478-7770(W)
Third Party Defendant	Antee, Bobby	
Third Party Defendant	Era Brokers	Barry E. Clarkson <i>Retained</i> 702-345-7588(W)
Third Party Defendant	Levy, Drew	
Third Party Defendant	Moore, Jeff	Barry E. Clarkson <i>Retained</i> 702-345-7588(W)
Third Party Defendant	Parker, Melissa	Anthony T. Garasi <i>Retained</i> 7022586665(W)
Third Party Defendant	Realty One Inc	Anthony T. Garasi <i>Retained</i> 7022586665(W)
Third Party Defendant	Satdjian, Vatche	
Third Party Defendant	Valley West Mortgage	
Third Party Plaintiff	Licari, Lindsey <i>Also Known As</i> Antee, Lindsey	Jared B. Jennings <i>Retained</i> 702-979-3565(W)

	OTHER EVENTS AND HEARINGS
2/17/2018	Complaint <i>Complaint</i>
2/17/2018	Initial Appearance Fee Disclosure <i>Initial Appearance Fee Disclosure</i>
2/18/2018	Summons Electronically Issued - Service Pending <i>Summons.</i>
1/07/2019	Case Reassigned to Department 18 <i>Judicial Reassignment - From Judge Villani to Judge Holthus</i>
1/16/2019	Affidavit of Service <i>Affidavit of Service.</i>
5/15/2019	Three Day Notice to Plead <i>Three Day Notice to Plead on Defendant Lindsay Licari aka Lindsey Antee.</i>
5/17/2019	Answer and Counterclaim <i>DEFENDANT S ANSWER AND COUNTERCLAIM</i>
5/07/2019	Answer to Counterclaim <i>Plaintiffs' Answer to Defendant's Counterclaim</i>
5/17/2019	Notice of Early Case Conference <i>Notice of Telephonic Early Case Conference</i>
5/21/2019	Joint Case Conference Report <i>Joint Case Conference Report</i>
7/03/2019	Demand for Jury Trial <i>Defendant/Counter-Claimant Lindsey Licari's Demand for Jury Trial</i>
7/19/2019	Joint Request for Exemption <i>Joint Request for Exemption from Arbitration</i>
9/02/2019	Commissioners Decision on Request for Exemption - Granted <i>Commissioner's Decision on Joint Request for Exemption - GRANTED</i>
9/12/2019	Mandatory Rule 16 Conference Order <i>Order Scheduling Mandatory Case Management Conference</i>
9/18/2019	Mandatory Rule 16 Conference (9:00 AM) (Judicial Officer Holthus, Mary Kay) Parties Present Minutes <i>08/21/2019 Reset by Court to 09/18/2019</i> Result: Matter Heard
9/26/2019	Scheduling and Trial Order <i>Scheduling Order and Order Setting Civil Jury Trial, Pre-Trial Conference/Calendar Call</i>
3/25/2020	Stipulation and Order to Extend Discovery Deadlines <i>Stipulation and Order to Extend Discovery Deadlines and Trial Date</i>
4/08/2020	Motion <i>Motion to Withdraw as Attorney of Record</i>
4/09/2020	Amended Order Setting Jury Trial <i>Amended Order Setting Civil Jury Trial</i>
4/28/2020	Clerk's Notice of Hearing <i>Notice of Hearing</i>
5/01/2020	Motion to Withdraw as Counsel (3:00 AM) (Judicial Officer Holthus, Mary Kay) <i>Motion to Withdraw as Attorney of Record</i> Minutes Result: Minute Order - No Hearing Held
5/05/2020	Order to Withdraw as Attorney of Record <i>ORDER GRANTING MOTION TO WITHDRAW AS ATTORNEY OF RECORD</i>
5/06/2020	Motion for Leave to File <i>Courts Leave to File Third Party Complaint</i>
5/08/2020	Clerk's Notice of Hearing <i>Notice of Hearing</i>
5/08/2020	Notice of Entry <i>Notice of Entry of Order Granting Motion to Withdraw as Attorney of Record</i>
5/10/2020	Motion to Consolidate <i>Motion to Combine Cases</i>
5/18/2020	Supplement to List of Witnesses & Documents <i>Defendants/Counter Claimant First supplemental List of Witnesses and Production of Documents Pursuant to NRCP 16.1</i>
5/23/2020	Opposition to Motion <i>Opposition to Defendants' Motion [For] Court's Leave to File Third-Party Complaint</i>
5/23/2020	Supplement <i>Supplement to Motion for Third Party Complaint</i>
5/24/2020	Opposition to Motion <i>Opposition to Defendant's Motion to Combine Cases</i>
5/30/2020	Proof of Service <i>Served Summons ERA</i>
5/30/2020	Proof of Service <i>Served Summons Valley West</i>
5/30/2020	Proof of Service <i>Served Summons Melissa Parker</i>
5/30/2020	Proof of Service <i>Served Summons Vatche</i>
5/30/2020	Proof of Service <i>Served Summons One Realty</i>
5/30/2020	Proof of Service <i>Served Summons Jeff Moore</i>
7/06/2020	Motion for Partial Summary Judgment <i>Plaintiff's Motion for Partial Summary Judgment</i>
7/07/2020	Motion to Strike <i>Motion to Strike Defendant's Third-Party Complaint</i>
7/08/2020	Clerk's Notice of Hearing

7/08/2020	Opposition <i>Opposition to strike third party complaint</i>
7/08/2020	Exhibits <i>Exhibits for Opposition to strike third party complaint</i>
7/08/2020	Supplement <i>Opposition to Motion to Strike Third Party Complaint</i>
7/09/2020	Clerk's Notice of Nonconforming Document <i>Clerk's Notice of Nonconforming Document</i>
7/10/2020	Clerk's Notice of Nonconforming Document and Curative Action <i>Clerk's Notice of Curative Action</i>
7/12/2020	Opposition <i>Opposition for Partial Summary Judgement</i>
7/13/2020	Clerk's Notice of Hearing <i>Notice of Hearing</i>
7/14/2020	Motion to Dismiss <i>Third-Party Defendants ERA Brokers and Jeff Moore's Motion to Dismiss Pursuant to NRCP 12(b)(3) and 12(b)(5)</i>
7/15/2020	Motion to Consolidate (10:00 AM) (Judicial Officer Holthus, Mary Kay) <i>Defendant's Motion to Combine Cases</i> Parties Present Minutes Result: Motion Denied
7/15/2020	Clerk's Notice of Hearing <i>Notice of Hearing</i>
7/16/2020	Motion To Dismiss - Alternative Motion For Summary Judgment <i>Third-Party Defendants Realty One Group (erroneously name Realty One Inc.) and Melissa Parker's Motion to Dismiss Third-Party Complaint Pursuant to NRCP 12(B) and NRCP 9(b), or in the Alternative, Motion for Summary Judgment and Motion Strike Defendant/Counterclaimant/Third-Party Plaintiff Lindsey Licari's Third-Party Plaintiff Lindsey Licari's Motion for Leave to Amend</i>
7/16/2020	Initial Appearance Fee Disclosure <i>DEFENDANTS REALTY ONE GROUP (erroneously named REALTY ONE INC.) AND MELISSA PARKER S INITIAL APPEARANCE FEE DISCLOSURE</i>
7/17/2020	Motion for Sanctions <i>Rule 11 Motion for Sanctions</i>
7/17/2020	Clerk's Notice of Hearing <i>Notice of Hearing</i>
7/17/2020	Opposition to Motion <i>Opposition to Defendants Realty One Group (erroneously named Realty One Inc) and Melissa Parker's Initial Appearance Fee Disclosure and Opposition Third-Party Defendants Realty One Group (erroneously names Realty One Inc) and Melissa Parker's Motion to Dismiss Third-Party Complaint Pursuant to NRCP 12(b) and NRCP 9(b), or in the Alternative, Motion for Summary Judgment and Opposition to Motion to Strike Defendant/Counterclaimant and Opposition to Defendant/Counterclaimant/Third Party Plaintiff, Lindsey Lican's motion for Leave to Amend and Opposition to Era Brokers Strike Third Party Complaint and Dismissal Pursuant to NRCP 12(b) and 12(b)(5)</i>
7/17/2020	Exhibits <i>exhibits part 1</i>
7/17/2020	Exhibits <i>Part 2</i>
7/20/2020	Initial Appearance Fee Disclosure <i>Third Party Defendants Era Brokers and Jeff Moore's Initial Appearance and Fee Disclosure</i>
7/20/2020	Clerk's Notice of Nonconforming Document <i>Clerk's Notice of Nonconforming Document</i>
7/21/2020	Clerk's Notice of Nonconforming Document and Curative Action <i>Clerk's Notice of Curative Action</i>
7/22/2020	Confirmation of Counsel (10:00 AM) (Judicial Officer Holthus, Mary Kay) Parties Present Minutes Result: Confirmed
7/22/2020	Motion for Leave (10:00 AM) (Judicial Officer Holthus, Mary Kay) <i>Courts Leave to File Third Party Complaint</i> Parties Present Minutes Result: Motion Denied
7/22/2020	Clerk's Notice of Hearing <i>Notice of Hearing</i>
7/22/2020	All Pending Motions (10:00 AM) (Judicial Officer Holthus, Mary Kay) Parties Present Minutes Result: Matter Heard
7/28/2020	Motion <i>Motion for Reconsideration and opposition to sanctions</i>
7/30/2020	Clerk's Notice of Hearing <i>Notice of Hearing</i>
7/04/2020	Order Denying Motion <i>ORDER DENYING DEFENDANT S MOTION TO COMBINE CASES</i>
7/04/2020	Order Denying Motion <i>ORDER DENYING DEFENDANT S MOTION FOR COURT S LEAVE TO FILE A THIRD-PARTY COMPLAINT</i>
7/05/2020	Reply in Support <i>Defendant's Reply to Plaintiff's Reply in Support of Plaintiff's Motion for Summary Judgment</i>
7/06/2020	Reply <i>Reply to Plaintiffs Reply to Motion for Summary Judgement</i>
7/07/2020	Notice of Entry of Order <i>Notice of Entry of Order Denying Defendant's Motion for Court's Leave to File a Third-Party Complaint</i>
7/07/2020	Notice of Entry of Order <i>Notice of Entry of Order Denying Defendant's Motion to Combine Cases</i>
7/07/2020	Supplement to Motion for Summary Judgment

8/11/2020 **Supplemental Reply to Plaintiff's Reply in Support of Plaintiff's Motion for Summary Judgment**
Opposition to Motion
Plaintiff's Opposition to Defendant's Motion for Partial Summary Judgment and for Reconsideration to Consolidate Cases

8/12/2020 **Motion**
Defendant's Motion to Shorten Time for Motion for Reconsideration to Combine Cases

8/12/2020 **Exhibits**
eXHIBITS FOR MOTION SHORTENING TIME

8/12/2020 **Notice of Lis Pendens**
Notice of Lis Pendens

8/17/2020 **Clerk's Notice of Hearing**
Notice of Hearing

8/24/2020 **Opposition to Motion**
Defendants Opposition to Plaintiff's Motion for Partial Summary Judgment and Defendants Reply to Plaintiff for Defendants Motion for Partial Summary Judgment

8/24/2020 **Exhibits**
EXHIBITS FOR OPPOSITIONS TO PLAINTIFF'S SUMMARY JUDGEMENT

8/25/2020 **Opposition to Motion**
Plaintiff's Opposition to Defendant's Motion to Shorten Time for Motion for Reconsideration to Combine Cases

8/25/2020 **Objection**
Plaintiffs' Objection to Defendant's Opposition to Plaintiffs' Motion for Partial Summary Judgment

8/25/2020 **Reply in Support**
Reply in Support of Plaintiff's Opposition to Defendant's Motion to Shorten Time for Motion for Reconsideration to Combine Cases

8/26/2020 **Reply in Support**
Reply in Support of Plaintiffs' Motion for Sanctions Pursuant to NRCP 11

8/01/2020 **Reply in Support**
Reply in Support of Plaintiff's Reply in Support of Plaintiff's Motion for Sanctions Pursuant to NRCP 11 and Defendants Motion to Dismiss and Enforce Judgment

8/02/2020 **Motion for Partial Summary Judgment** (10:00 AM) (Judicial Officer Holthus, Mary Kay)
Plaintiff's Motion for Partial Summary Judgment
08/12/2020 Reset by Court to 09/02/2020
Result: Denied Without Prejudice

8/02/2020 **CANCELED Motion to Strike** (10:00 AM) (Judicial Officer Holthus, Mary Kay)
Vacated
Plaintiff's Motion to Strike Defendant's Third-Party Complaint
08/19/2020 Reset by Court to 09/02/2020

8/02/2020 **CANCELED Motion to Dismiss** (10:00 AM) (Judicial Officer Holthus, Mary Kay)
Vacated
Third-Party Defendants ERA Brokers and Jeff Moore's Motion to Dismiss Pursuant to NRCP 12(b)(3) and 12(b)(5)
08/19/2020 Reset by Court to 09/02/2020

8/02/2020 **CANCELED Motion to Dismiss** (10:00 AM) (Judicial Officer Holthus, Mary Kay)
Vacated
Third-Party Defendants Realty One Group (erroneously name Realty One Inc.) and Melissa Parker's Motion to Dismiss Third-Party Complaint Pursuant to NRCP 12(B) and NRCP 9(b), or in the Alternative, Motion for Summary Judgment and Motion Strike Defendant/Counterclaimant/Third-Party Plaintiff Lindsey Licari's Third-Party Plaintiff Lindsey Licari's Motion for Leave to Amend
08/26/2020 Reset by Court to 09/02/2020

8/02/2020 **Motion for Sanctions** (10:00 AM) (Judicial Officer Holthus, Mary Kay)
Plaintiffs' Motion for Sanctions
08/26/2020 Reset by Court to 09/02/2020
Result: Denied

8/02/2020 **Motion For Reconsideration** (10:00 AM) (Judicial Officer Holthus, Mary Kay)
Motion for Reconsideration and Opposition to Sanctions
Result: Denied

8/02/2020 **All Pending Motions** (10:00 AM) (Judicial Officer Holthus, Mary Kay)
[Parties Present](#)
[Minutes](#)
Result: Matter Heard

8/16/2020 **Motion** (10:00 AM) (Judicial Officer Holthus, Mary Kay)
Defendant's Motion to Shorten Time for Motion for Reconsideration to Combine Cases
[Parties Present](#)
[Minutes](#)
Result: Denied

8/17/2020 **Recorders Transcript of Hearing**
Recorder's Transcript Re: Pending Motions - September 2, 2020

8/19/2020 **Motion for Summary Judgment**
Motion for Summary Judgment

8/19/2020 **Exhibits**
Exhibits for Summary Judgment

8/22/2020 **Clerk's Notice of Nonconforming Document**
Clerk's Notice of Nonconforming Document

8/22/2020 **Exhibits**
Summary Judgment

8/23/2020 **Clerk's Notice of Nonconforming Document and Curative Action**
Clerk's Notice of Curative Action

8/23/2020 **Clerk's Notice of Hearing**
Notice of Hearing

8/23/2020 **Order Denying Motion**
Order Denying Plaintiff's Motion for Summary Judgment

8/23/2020 **Order Denying Motion**
Order Denying Defendant's Motion For Reconsideration to Consolidate Cases

8/23/2020 **Order Denying Motion**
Order Denying Motion For Sanctions Pursuant to NRCP 11

8/23/2020 **Order Denying Motion**
Order Denying Motion For Sanctions Pursuant to NRCP 11

3/24/2020	Notice of Entry of Order <i>Notice of Entry of Order Denying Plaintiff's Motion for Summary Judgment</i>
3/25/2020	Notice of Entry of Order <i>Notice of Entry of Order Denying Defendant's Motion for Reconsideration to Combine Cases</i>
3/05/2020	Opposition to Motion For Summary Judgment <i>Plaintiff's Opposition to Defendant's Motion for Summary Judgment</i>
3/16/2020	Motion for Summary Judgment <i>Plaintiff's Renewed Motion for Summary Judgment (Hearing Requested)</i>
3/19/2020	Clerk's Notice of Hearing <i>Notice of Hearing</i>
3/28/2020	Motion for Summary Judgment (10:00 AM) (Judicial Officer Holthus, Mary Kay) <i>Plaintiff Motion for Summary Judgment</i>
1/04/2020	CANCELED Pretrial/Calendar Call (10:00 AM) (Judicial Officer Holthus, Mary Kay) <i>Vacated - per Stipulation and Order</i>
1/16/2020	CANCELED Jury Trial (1:00 PM) (Judicial Officer Holthus, Mary Kay) <i>Vacated - per Stipulation and Order</i>
2/02/2020	Motion for Summary Judgment (10:00 AM) (Judicial Officer Holthus, Mary Kay) <i>Plaintiff's Renewed Motion for Summary Judgment</i>
4/07/2021	Pretrial/Calendar Call (9:00 AM) (Judicial Officer Holthus, Mary Kay)
4/19/2021	Jury Trial (1:00 PM) (Judicial Officer Holthus, Mary Kay)

FINANCIAL INFORMATION

Counter Claimant Licari, Lindsey				
Total Financial Assessment				423.0
Total Payments and Credits				423.0
Balance Due as of 10/21/2020				0.0
1/20/2019	Transaction Assessment			223.0
1/14/2019	Payment (Phone)	Receipt # 2019-49761-CCCLK	Jared V Jennings	(223.0)
1/19/2020	Transaction Assessment			200.0
1/19/2020	Efile Payment	Receipt # 2020-52387-CCCLK	Licari, Lindsey	(200.0)
 Counter Defendant Perdue, Linda				
Total Financial Assessment				700.0
Total Payments and Credits				700.0
Balance Due as of 10/21/2020				0.0
1/17/2018	Transaction Assessment			300.0
1/17/2018	Efile Payment	Receipt # 2018-82778-CCCLK	Perdue, Linda	(300.0)
1/06/2020	Transaction Assessment			200.0
1/06/2020	Efile Payment	Receipt # 2020-35388-CCCLK	Perdue, Linda	(200.0)
1/16/2020	Transaction Assessment			200.0
1/16/2020	Efile Payment	Receipt # 2020-58646-CCCLK	Perdue, Linda	(200.0)
 Third Party Defendant Realty One Inc				
Total Financial Assessment				453.0
Total Payments and Credits				453.0
Balance Due as of 10/21/2020				0.0
1/16/2020	Transaction Assessment			453.0
1/16/2020	Efile Payment	Receipt # 2020-38419-CCCLK	Realty One Inc	(453.0)

REGISTER OF ACTIONS

CASE No. A-20-808737-C

Indsey Licari, Plaintiff(s) vs. Nikki Bott, Defendant(s)

Case Type: Negligence - Other Negligence

Date Filed: 01/17/2020

Location: Department 11

Cross-Reference Case Number: A808737

Supreme Court No.: 81942

PARTY INFORMATION

Arbitrator	Apple, Robert M.	Lead Attorneys
Defendant	Antee, Bobby	
Defendant	Bott, Nikki Sikalis	Joseph P Garin Retained 702-382-1500(W)
Defendant	Chase, Garrett	
Defendant	Conway, Debbie	
Defendant	Era Brokers	
Defendant	Fulton, Adam	
Defendant	Greater Las Vegas Association of Realtors	
Defendant	Jennings & Fulton Ltd	
Defendant	Jennings, Jared	
Defendant	Levy, Drew	
Defendant	McClosky, Daryl	
Defendant	Moulton, Grayson	
Defendant	National Title Co.	Joseph P Garin Retained 702-382-1500(W)
Defendant	Naw, Linda	
Defendant	Nevada Real Estate Division Business and Industry	
Defendant	One Realty Group	
Defendant	Parker, Melissa	
Defendant	Sajidian, Vatche	
Defendant	Shumway Van Ltd	
Defendant	Stratton, Linda	

Defendant Trujillo, Ingrid
Defendant Valley West Mortgage
Defendant Willson, Logan
Plaintiff Licari, Lindsey

Pro Se

EVENTS & ORDERS OF THE COURT

DISPOSITIONS
10/13/2020 **Summary Judgment** (Judicial Officer: Gonzalez, Elizabeth)
Debtors: Lindsey Licari (Plaintiff)
Creditors: Nikki Sikalis Bott (Defendant), National Title Co. (Defendant)
Judgment: 10/13/2020, Docketed: 10/14/2020

OTHER EVENTS AND HEARINGS
11/17/2020 **Initial Appearance Fee Disclosure**
Initial Appearance Fee Disclosure
11/17/2020 **Complaint**
Complaint
11/17/2020 **Summons Electronically Issued - Service Pending**
Summons Electronically Issued
12/05/2020 **Affidavit of Service**
Affidavit of Service of Summons; Complaint; Initial Appearance Fee Disclosure
12/20/2020 **Answer to Complaint**
Defendants' Answer to Plaintiff's Complaint and Affirmative Defenses
12/20/2020 **Initial Appearance Fee Disclosure**
Initial Appearance Fee Disclosure
1/07/2020 **Appointment of Arbitrator**
Appointment of Arbitrator
1/28/2020 **ADR - Change of Status**
Change of Status
1/29/2020 **ADR - Action Required**
Action Required - settled
1/22/2020 **Motion**
Motion to Withdraw as Attorney of Record
1/22/2020 **Clerk's Notice of Hearing**
Notice of Hearing
1/28/2020 **Offer of Judgment**
Defendants Offer of Judgment
1/03/2020 **Opposition to Motion For Summary Judgment**
Opposition to Motion For Summary Judgment
1/19/2020 **Disclosure of Documents and Witnesses Pursuant to NRCP 16.1**
National Title Witnesses
1/26/2020 **Motion to Withdraw as Counsel** (3:00 AM) (Judicial Officer Gonzalez, Elizabeth)
Motion to Withdraw as Attorney of Record
[Minutes](#)
Result: Granted
1/07/2020 **Motion for Leave to File**
Motion Leave of the Court to File Third Party Complaints
1/07/2020 **Order to Withdraw as Attorney of Record**
Order Granting Motion to Withdraw as Attorney of Record
1/08/2020 **Clerk's Notice of Hearing**
Notice of Hearing
1/09/2020 **Notice of Entry**
Notice of Entry of Order Granting Motion to Withdraw as Attorney of Record
1/12/2020 **Supplement**
Supplemental Exhibits for Leave of the Court to Filed Third Party Complaints
1/13/2020 **Request for Exemption From Arbitration**
Exemption from arbitration
1/14/2020 **Notice of Early Arbitration Conference**
Notice of Early Arbitration Conference
1/20/2020 **Opposition to Request for Exemption**
Defendants' Opposition to the Request for Exemption from Arbitration
1/20/2020 **Opposition**
Defendants' Opposition to the Motion for Leave to File Third Party Complaints
1/29/2020 **Commissioners Decision on Request for Exemption - Granted**
Commissioner's Decision on Request for Exemption
1/02/2020 **Amended Complaint**
Complaint (Amended)
1/02/2020 **ADR - Change of Status**
Change of Status
1/02/2020 **Arbitrators Bill for Fees and Costs**
Arbitrator's Bill for Fees and Costs
1/03/2020 **Lis Pendens**
Notice Of Lis Pendens
1/04/2020 **Objection to Arbitrator's Bill for Fees and/or Costs**
Objection to Arbitrator's Bill for Fees and/or Costs

	<i>Supplemental for Motion to Grant Leave to Amend Complaint and Supplemental for Lis Pendens</i>
3/06/2020	Exhibits <i>Exhibit 1</i>
3/07/2020	Motion for Leave (3:00 AM) (Judicial Officer Gonzalez, Elizabeth) <i>Plaintiff's Motion Leave of the Court to File Third Party Complaints</i> Minutes
	Result: Denied
3/10/2020	Exhibits <i>Exhibit 1</i>
3/10/2020	Motion to Reconsider <i>Motion for Reconsideration to Amend Complaint and Notice of Lis Pendens</i>
3/10/2020	Exhibits <i>Exhibit 1</i>
3/10/2020	Notice of Lis Pendens <i>Notice of Lis Pendens</i>
3/12/2020	Clerk's Notice of Nonconforming Document <i>Clerk's Notice of Nonconforming Document</i>
3/12/2020	Amended Complaint <i>Complaint (Amended)</i>
3/12/2020	Exhibits <i>Exhibits for Motion for Reconsideration</i>
3/12/2020	Notice of Lis Pendens <i>Notice of Lis Pendens</i>
3/13/2020	Clerk's Notice of Nonconforming Document and Curative Action <i>Clerk's Notice of Curative Action</i>
3/17/2020	Clerk's Notice of Hearing <i>Notice of Hearing</i>
3/18/2020	Motion for Summary Judgment <i>Defendants' Motion for Summary Judgment Alternatively, to Enforce the Settlement</i>
3/19/2020	Clerk's Notice of Hearing <i>Notice of Hearing</i>
3/21/2020	Commissioner's Decision on Objection to Arbitrator <i>Commissioner's Ruling on Objection to Arbitrator's Bill for Fees and Costs</i>
3/24/2020	Opposition to Motion <i>Plaintiff's Opposition to Defendants Motion for Summary Judgment or Alternatively to Enforce Settlement</i>
3/24/2020	Exhibits <i>EXHIBITS FOR OPPOSITION TO DEFENDANTS SUMMARY JUDGEMENT</i>
3/26/2020	Opposition to Motion <i>Defendants' Opposition to the Motion for Reconsideration on the Motion for Leave to File Third Amended Complaints</i>
3/15/2020	Reply in Support <i>Defendants' Reply in Support of their Motion for Summary Judgment Alternatively, to Enforce the Settlement</i>
3/16/2020	Notice <i>Notice of Plaintiff's Subsequently Filed Complaints in other Courts</i>
3/17/2020	Order Denying Motion <i>Order Denying the Motion for Leave to File Third Party Complaints</i>
3/17/2020	Minute Order (9:59 AM) (Judicial Officer Gonzalez, Elizabeth) <i>Minute Order Resetting Motion for Reconsideration</i> Minutes
	Result: Minute Order - No Hearing Held
3/17/2020	Reply in Support <i>Reply in Support of Defendant's Reply in Support of Their Motion for Summary Judgment, Alternatively to Enforce the Settlement</i>
3/19/2020	Motion for Summary Judgment <i>Summary Judgment</i>
3/19/2020	Exhibits <i>Exhibits</i>
3/19/2020	Ex Parte Motion <i>Ex Parte Motion for Continuance</i>
3/21/2020	Minute Order (8:41 AM) (Judicial Officer Gonzalez, Elizabeth) <i>Minute Order regarding Ex Parte Motion for Continuance</i> Minutes
	Result: Granted
3/22/2020	Clerk's Notice of Nonconforming Document <i>Clerk's Notice of Nonconforming Document</i>
3/22/2020	Exhibits <i>exhibits for summary judgement</i>
3/23/2020	Clerk's Notice of Nonconforming Document and Curative Action <i>Clerk's Notice of Curative Action</i>
3/23/2020	Clerk's Notice of Hearing <i>Notice of Hearing</i>
3/23/2020	Clerk's Notice of Nonconforming Document and Curative Action <i>Clerk's Notice of Nonconforming Document and Curative Action</i>
0/06/2020	Motion For Reconsideration (9:00 AM) (Judicial Officer Gonzalez, Elizabeth) <i>Plaintiff's Motion for Reconsideration to Amend Complaint and Notice of Lis Pendens</i> <i>09/18/2020 Reset by Court to 09/22/2020</i> <i>09/22/2020 Reset by Court to 10/06/2020</i>
	Result: Withdrawn
0/06/2020	Motion for Summary Judgment (9:00 AM) (Judicial Officer Gonzalez, Elizabeth) <i>Defendants' Motion for Summary Judgment Alternatively, to Enforce the Settlement</i> <i>09/22/2020 Reset by Court to 10/06/2020</i>
	Result: Granted
0/06/2020	All Pending Motions (9:00 AM) (Judicial Officer Gonzalez, Elizabeth) Parties Present

3/12/2020	Notice of Entry of Order <i>Notice of Entry of Order Denying the Motion for Leave to File Third Party Complaints</i>
3/13/2020	Findings of Fact, Conclusions of Law and Judgment <i>Findings of Fact, Conclusions of Law and Judgment</i>
3/13/2020	Order to Statistically Close Case <i>Civil Order to Statistically Close Case</i>
3/13/2020	Notice of Appeal <i>Notice of Appeal</i>
3/13/2020	Notice of Entry of Order <i>NOTICE OF ENTRY OF ORDER OR JUDGMENT</i>
3/13/2020	Transcript of Proceedings <i>transcripts</i>
3/13/2020	Motion <i>Plaintiff's Motion to Dismiss Due to Fraud on the Court</i>
3/13/2020	Exhibits <i>Exhibits</i>
3/14/2020	Clerk's Notice of Hearing <i>Notice of Hearing</i>
3/14/2020	Case Appeal Statement <i>Case Appeal Statement</i>
3/16/2020	Memorandum of Costs and Disbursements <i>Defendants Nikki Sikalis Bott and National Title Co.'s Memorandum of Costs and Disbursements</i>
1/10/2020	CANCELED Motion for Summary Judgment (9:00 AM) (Judicial Officer Gonzalez, Elizabeth) <i>Vacated</i> <i>Plaintiff's Motion for Summary Judgment</i>
1/17/2020	Motion to Dismiss (9:00 AM) (Judicial Officer Gonzalez, Elizabeth) <i>Plaintiff's Motion to Dismiss Due to Fraud on the Court</i>

FINANCIAL INFORMATION

	Defendant Bott, Nikki Sikalis Total Financial Assessment Total Payments and Credits Balance Due as of 10/21/2020				30. 30. 0.
2/25/2020	Transaction Assessment				30.
2/27/2020	Payment (Phone)	Receipt # 2020-12103-CCCLK	Joseph Garin		(30.0
	Defendant National Title Co. Total Financial Assessment Total Payments and Credits Balance Due as of 10/21/2020				423. 423. 0.
2/20/2020	Transaction Assessment				223.
2/20/2020	Efile Payment	Receipt # 2020-10675-CCCLK	National Title Co.		(223.0
3/18/2020	Transaction Assessment				200.
3/18/2020	Efile Payment	Receipt # 2020-45716-CCCLK	National Title Co.		(200.0
	Plaintiff Licari, Lindsey Total Financial Assessment Total Payments and Credits Balance Due as of 10/21/2020				494. 494. 0.
1/17/2020	Transaction Assessment				270.
1/17/2020	Efile Payment	Receipt # 2020-03357-CCCLK	Licari, Lindsey		(270.0
3/19/2020	Transaction Assessment				200.
3/19/2020	Efile Payment	Receipt # 2020-52388-CCCLK	Licari, Lindsey		(200.0
3/13/2020	Transaction Assessment				24.
3/13/2020	Efile Payment	Receipt # 2020-57495-CCCLK	Licari, Lindsey		(24.0

Exhibit 5

1 AOS

2 LINDSEY LICARI

3 (Your Name)

4 9564 SCORPION TRAC CT

5 (Your Mailing Address)

6 LAS EGAS, NV 89178

7 (Your City, State, Zip Code)

8 7025776657

9 (Your Telephone Number)

10 (Your Fax Number)

11 LINDSEY LICARI14@AOL.COM

12 (Your E-mail Address)

13 Plaintiff, Self-Represented

14 EIGHTH JUDICIAL DISTRICT COURT

15 CLARK COUNTY, NEVADA

16 Plaintiff's
17 Name:

18 LINDSEY LICARI

19 Plaintiff,

20 vs.

21 Defendant's
22 Name:

23 SHUMWAY VAN LTD

24 Defendant.

Case No.: A-20-820980-C

Dept. No.: 32

25 **AFFIDAVIT/DECLARATION OF SERVICE UNDER PENALTY OF PERJURY**

26 (Insert name of person performing service) M. Game P #15503, being duly

27 sworn or under penalty of perjury, states that at all times relevant, I was over 18 years of age and not a
28 party to or interested in the above-captioned case; that I served a copy of the ☒ Summons, ☒ Complaint,

29 ☐ Other (specify) _____ ON (insert date and

30 time you served) Sept 24, 2020, at the hour of 1019 A.M., on Defendant (insert Defendant's

31 name) SHUMWAY VAN LTD by the

32 following method (complete appropriate paragraph below):

33 ☐ **Personal service per NRCP 4.2(a)(1):** Delivering and leaving a copy with (insert

34 Defendant's name) _____ at (insert address at

35 which you served) _____

36
37
38 ///

☐ **Substitute service per NRCP 4.2(a)(2):** Delivering and leaving a copy with *(insert name or physical description of person served)* _____, a person of suitable age and discretion residing at Defendant's dwelling house or usual place of abode, at *(insert Defendant's address)* _____.

☒ **Service on a business entity per NRCP 4.2(c)(1)(A):** Delivering and leaving a copy with *(insert name or physical description of person served)* PAULA LAMPANA, who is Defendant's *(check one)* ☐ registered agent, ☐ officer or director, ☐ partner, ☐ member, ☐ manager, ☐ trustee, or ☒ other *(specify)* RECEPTIONIST, at *(insert address at which you served)* 8985 S. EASTMAN AVE, STE 100, LV, NV 89123.

☐ **Other method of service authorized by Nevada statute or court rule:** _____

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAW OF THE STATE OF NEVADA THAT THE FOREGOING IS TRUE AND CORRECT.

SERVER'S SIGNATURE: [Signature] **Date:** 9-24-20

Server's Phone: 702-456-4099

Server's ☐ Residential/☒ Business Address: 301 E. CLARK AVE #100 LV, NV 89101

☐ I am a licensed process server or an employee of a licensed process server; my license or registration number is *(insert license or registration number)*: _____.

☒ I am not required to be licensed under chapter 648 of the Nevada Revised Statutes or another provision of law because am not engaged in the business of serving legal process within the State of Nevada.

SUMM

LINDSEY LICARI

(Your Name)

9564 SCORPION TRACK CT

(Your Mailing Address)

LAS VEGAS, NV 89178

(Your City, State, Zip Code)

7025776657

*(Your Telephone Number)**(Your Fax Number)*

LINDSEYLICARI14@AOL.COM

(Your E-mail Address)

Plaintiff, Self-Represented

EIGHTH JUDICIAL DISTRICT COURT**CLARK COUNTY, NEVADA***Plaintiff's
Name:*

LINDSEY LICARI

Plaintiff,

vs.

*Defendant's
Name:*

SHUMWAY VAN LTD

Defendant.

Case No.: A-20-820980-C

Dept. No.: 32

SUMMONS

NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU FILE A RESPONSE WITH THE COURT WITHIN 21 DAYS. READ THE INFORMATION BELOW CAREFULLY.

To the Defendant named above: SHUMWAY VAN LTD

A civil complaint has been filed by the Plaintiff against you. Plaintiff is seeking to recover the relief requested in the complaint, which could include a money judgment against you or some other form of relief.

If you intend to defend this lawsuit, within 21 calendar days¹ after this Summons is served on you (not counting the day of service), you must:

1. File with the Clerk of the Court, whose address is shown below, a formal written response (typically a legal document called an "answer," but potentially some other

¹ The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members, and legislators each have 45 days after service of this Summons within which to file a response to Plaintiff's complaint.

response) to Plaintiff's complaint.

2. Pay the required filing fee to the court, or file an Application to Proceed *In Forma Pauperis* and request a waiver of the filing fee.

3. Serve (by mail or hand delivery) a copy of your response upon the Plaintiff whose name and address is shown below.

Information and forms to assist you are available, free of charge, at the Civil Law Self-Help Center at the Regional Justice Center, 200 Lewis Avenue, Las Vegas, Nevada, and on the center's website at www.civillawselfhelpcenter.org.

If you fail to respond, the Plaintiff can request your default. The court can then enter judgment against you for the relief demanded by the Plaintiff in the complaint, which could result in money or property being taken from you or some other relief requested in Plaintiff's complaint.

If you intend to seek an attorney's advice, do it quickly so that your response can be filed on time.

STEVEN D. GRIERSON, CLERK OF COURT

Laurie Williams

9/23/2020

By: Deputy Clerk
Regional Justice Center
200 Lewis Avenue
Las Vegas, Nevada 89155

Date:

Issued at the request of:

Lindsey Licari

LINDSEY LICARI

(Your Name)

9564 SCORPION TRACK CT

(Your Street Address)

LAS VEGAS, NV 89178

(Your City, State, and Zip Code)

Plaintiff, Self-Represented

Note: When service is by publication, add a brief summary of the claims asserted, the relief sought, and include any special statutory requirements. This summary should have been proposed through a Motion Seeking Publication and approved through an Order for Service by Publication. See Nevada Rule of Civil Procedure 4.4(c).

Rev. 2/20/2019

© Civil Law Self-Help Center

Steven D. Grierson

1 **COMP**
2 LINDSEY LICARI
3 9564 SCORPION TRACK CT
4 LAS VEGAS, NV 89178
5 702-577-6657
6 LINDSEYLICARI14@AOL.COM
7 PLAINTIFF, LINDSEY LICARI, IN PROPER PERSON

8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 LINDSEY LICARI, an individual,
11
12 Plaintiff,

CASE NO.:

DEPT. NO.:

13 v.

COMPLAINT
Exempt from Arbitration
(Amount in Controversy is over
\$50,000)
(Amended)

14 NIKKI SIKALIS BOTT, an individual;
15 NATIONAL TITLE CO., a Nevada
16 corporation; LINDA NAW, an individual.,
17 ERA BROKERS; a Nevada Corporation;
18 VALLEY WEST MORTGAGE, a Nevada
19 Corporation, DREW LEVY, an individual,
20 BOBBY ANTEE, an individual., ONE
21 REALTY GROUP; a Nevada Corporation;
22 MELISSA PARKER; an individual;
23 MELANIE TREANOR, an individual;
24 GREATER LAS VEGAS ASSOCIATION OF
25 REALTORS; a Nevada Corporation;
26 NEVADA REAL ESTATE DIVISION
27 BUSINESS AND INDUSTRY; a Nevada
28 Corporation; LINDA STRATTON, an
individual; INGRID TRUJILLO, an individual;
DARYL MCCLOSKEY; an individual;
VATCHE SAJIDIAN; an individual; CLARK
COUNTY RECORDERS OFFICE, a Nevada
Corporation; NEVADA SECRETARY OF
STATE OFFICE; a Nevada Corporation; LAS
VEGAS METROPOLITAN POLICE
DEPARTMENT; a Nevada Corporation
JENNINGS AND FULTON LTD, a Nevada
Corporation, SHUMWAY VAN LTD; a
Nevada Corporation; DOES I through X; and
ROE CORPORATIONS I through X, inclusive,

Defendants.

Exhibit 6

18343E – RESPONDENT DOCUMENTS

Form #E-3

Greater Las Vegas Association of REALTORS®
6360 South Rainbow Blvd., Las Vegas, NV 89118
702-784-5052

CASE NUMBER: 18343E

Reply (Ethics)

To the Professional Standards Committee of the

Greater Las Vegas Association of REALTORS®
Board or State Association

Lindsey Antee

Complainant(s)

Filed November 20, 2018

Linda Naw, ERA Brokers Consolidated

Respondent(s)

in a matter of alleged violation of the Code of Ethics or other membership duty as set forth in the bylaws of this Board.

Respondent(s) replies and substantiates such reply by the following facts and/or attached statement: see attached statement

This is true and correct to the best knowledge and belief of the undersigned. I (we) declare that to the best of my (our) knowledge and belief, the statements contained in this Reply are true and correct.

Boards or Associations of REALTORS® where I hold or have held membership in the preceding three (3) years:

Greater Las Vegas Association of REALTORS(R)

I understand that, if found in violation of the Code of Ethics or other membership duty, a respondent will be assessed an administrative processing fee of \$500.00.

Respondent(s):

Linda Naw, ERA Brokers Consolidated

Type/Print Name



Signature

2855 St. Rose Parkway, Henderson, Nevada 89052

Address

(702) 306-3587

Phone

Linda@nawrealestategroup.com

Email

Type/Print Name

Signature

Address

Phone

Email

RECEIVED NOV 20 2018 - LH

*Fee not to exceed \$500 and may not be assessed unless the Board of Directors has established policy to assess this fee against respondents found in violation of the Code of Ethics or other membership duty.

R-1

Greater Las Vegas Association of REALTORS®
6360 South Rainbow Blvd.
Las Vegas, NV 89118

CASE NUMBER: 18343E

Notice of Right to Challenge Tribunal Members*

Notice is given herewith to parties in the matter of Lindsey Antee vs. Linda Naw, ERA Brokers Consolidated an ethics/arbitration proceeding, that a party has a right to challenge the qualifications of any individual who may be appointed to serve on a Hearing Panel or the Board of Directors. A list of such individuals is provided below. If you wish to challenge the qualifications of any of the individuals listed who may be appointed to sit on the Tribunal, please indicate by checking the appropriate blank, and return this form or a copy of same with a letter (or enclosed Form #A-8, if preferred) to the (Professional Standards Committee Chairperson) (Professional Standards Administrator) explaining your reason ("cause") for challenge. If your reason is deemed sufficient to support your challenge, the individual challenged will not be appointed to the Tribunal. Pursuant to Section 27, Qualification for Tribunal, challenges must be filed with the Board within ten (10) days from the date the list of names is transmitted.

Brian Tod Barton	Tina Helleberg	Benjamin Ramirez	BOD Appeal Process	
Vandana Bhalla	Melissa Jones	Di Redman-Wolgram	Christopher Bishop	Amber Diskin
Honey Borla	Jean Sharon Jones	Linda Rheinberger	Janet Carpenter	Tim Kelly Kiernan
Kathryn Bovard	Patty Kelley	Bradford Roberts	Krystal Sherry	Aldo M. Martinez
Teri Brenkus	Keith Kelley	Louise Rozich	Thomas Blanchard	Christopher McGarey
Rick Brenkus	Joan Kuptz	Donna Ruthe	David J. Tina	Mark Sivek
Damon Caldwell	Donald Lainer	Ronnie Schwartz	Jillian Batchelor	Chantel Tilley
Teresa Chapman	Patrick Leibovici	Carol Severe	David Crete	Shyla Magee
Elaine Christensen	Keith Lynam	Susan Sippel	Shawn Cunningham	
Rosilyn Cobb	Charles Martin	Nora Slagle		
Peggy Cook	Patrick Martino	Linda Stegall		
Charles Doty	Ashley McCormick	Roger Stein		
Candace Doyle	JC Melvin	Oana Sterlacci		
Ross Fabrizio	Eric Mendoza	David Tina		
Mina Farah	Michele Mittemiller	Tommy Uribe		
Deirdre Felgar	Fafie Moore	Cheryl A Van Elsis		
Britney Gaiten	Robert Morganti	Darryl Victorian		
Iddo Gavish	Eileen S. Pettengill	Susann Weisse		
Ernest Gonzales	Jacqueline Porter	Robyn Yates		
Danny Gennette	Dale E. Puhl			

_____ Challenge: _____ Yes _____ No

_____ Challenge: _____ Yes _____ No

_____ Challenge: _____ Yes _____ No

_____ Challenge: _____ Yes _____ No

_____ Challenge: _____ Yes _____ No

Linda Naw

Party's Name (Type/Print)



Party's Signature

11/20/18

Date

Party's Name (Type/Print)

Party's Signature

Date

R-2

Greater Las Vegas Association of REALTORS®
6360 South Rainbow Blvd., Las Vegas, NV 89118
702-784-5052

DATE: November 20, 2018

CASE NUMBER: 18343E

Challenge to Qualifications by Parties to Ethics Proceeding

I (we), as party to the matter in Lindsey Antee vs. Linda Naw, ERA Brokers Consolidated,
hereby challenge the qualification of the following named individual(s) who may be appointed as a member(s) of the Tribunal* for the
following reasons. (NOTE: Unsubstantiated challenges will be disregarded.)**

Panel Member Challenged: _____

Reason: _____

Panel Member Challenged: _____

Reason: _____

Panel Member Challenged: _____

Reason: _____

Type/Print Name of Party: Linda Naw

Signed: [Signature] Date: 11/20/2018

Type/Print Name of Party: _____

Signed: _____ Date: _____

Type/Print Name of Party: _____

Signed: _____ Date: _____

*Members of ethics Hearing Panels or the Board of Directors.

**Use additional pages as required to list additional challenges to the qualifications of individuals who have been or may be selected to serve as member(s) of a Tribunal in an ethics proceeding to which you are a party.

Greater Las Vegas Association of REALTORS®
6360 South Rainbow Blvd., Las Vegas, NV 89118
(702) 784-5052

DESIGNATION OF COUNSEL
(ETHICS)

DATE: 11/20/2018

CASE NUMBER: 18343E

COMPLAINANT(S):

Lindsey Antee

RESPONDENT(S):

Linda Naw, ERA Brokers Consolidated

v.

☐ *I do not wish to designate counsel at this time*

OR

☒ I, Linda Naw, do hereby designate the following counsel for representation in all aspects of these proceedings (please check one):

☒ Legal Counsel

☐ REALTOR® Counsel

Counsel Name: Garrett R. Chase, Esq. and Michael C. Van, Esq.

Firm/Company Name: Shumway Van

Address: 8985 S. Eastern Ave, Suite 100

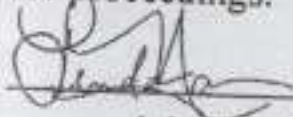
Las Vegas, NV 89123

Phone: () (702) 478-7770

Email: garrett@shumwayvan.com, michael@shumwayvan.com

The Greater Las Vegas Association of REALTORS® is requested to send copies of any and all future notices and other documents pertaining to this case to the above and the undersigned does hereby designate said counsel as his/her agent and spokesman in these proceedings.

Date: 11/20/2018

Signature: 

Name (please print): Linda Naw

Date: _____

Signature: _____

Name (please print): _____

Witnesses: _____

2-4

Greater Las Vegas Association of REALTORS®
6360 South Rainbow Blvd., Las Vegas, NV 89118
(702) 784-5052

CASE NUMBER: 18343E

**Respondent Linda Naw's Response to Appeal of Grievance Committee's
Dismissal of Ethics Complaint**

Ms. Linda Naw ("Ms. Naw"), of ERA Brokers Consolidated, by and through her counsel, the law firm of Shumway Van, hereby submits this statement in response to Lindsey Antee's ("Ms. Antee") Appeal of the Greater Las Vegas Association of Realtors ("GLVAR") Grievance Committee's Dismissal of Ms. Antee's Ethics Complaint. In her appeal statement, Ms. Antee has appealed the dismissal of her ethics complaint, which alleged violations of Articles 1, 9, 12, 13, and 16 of the National Association of Realtors' Code of Ethics and Standards of Practice (the "Code of Ethics"). Ms. Antee's appeal statement makes many false allegations about Ms. Naw as the basis for her disagreement with the Grievance Committee's decision. However, Ms. Antee's statements are not accurate or true. Furthermore, Ms. Naw fulfilled all of her obligations under the Code of Ethics. Therefore, and as discussed further below, the Grievance Committee's decisions dismissing Ms. Antee's complaint was well-founded and should be affirmed by this appellate panel.

Ms. Naw has already provided a detailed narrative of the transaction that is the subject of Ms. Antee's complaint and this appeal, in her response to Ms. Antee's complaint to the Real Estate Licensing Division (which was also dismissed entirely). Ms. Naw also provided documents, text messages, and a statement from Bobby Antee, in response to that complaint. Ms. Naw has attached that response as Exhibit A, along with the exhibits referenced therein (Exhibits #1-11), to this response packet and hereby reiterates and incorporates her statements and those documents in this response, as a statement of the facts underlying Ms. Antee's complaint and this appeal. Additionally, Ms. Naw has attached additional documents from the lender as

1 Exhibit B, discussed further below.

2 Ms. Antee's appeal statement accuses Ms. Naw of manipulating her into
3 signing gift letters, refusing to cancel the sale, taking her money, leaving Ms. Antee
4 off of the deed, and not disclosing fees or giving Ms. Antee an opportunity to review
5 "anything." But these accusations lack any support or evidence, and in fact, are
6 contradicted by the communications between Ms. Naw and Ms. Antee, as well as by
7 the actual purchaser in the subject transaction, Mr. Bobby Antee. In fact, it was the
8 lender in the transaction that requested the gift letters be executed by Ms. Antee, not
9 Ms. Naw. See Exhibit B. Ms. Naw only discussed the gift letters with Ms. Antee to
10 clarify what was being requested by the lender, after Ms. Antee and Mr. Antee did
11 not respond to the requests.

12 Regarding Ms. Antee's purported cancellation request, Ms. Antee had become
13 frustrated with the closing process and texted Ms. Naw on January 15, 2018, in a
14 group text conversation with her and Bobby Antee that she wanted to cancel because
15 the sale had not closed yet. See Exhibit 3 (Exhibit A). Yet when Ms. Naw said that
16 she would draft a cancellation, Bobby Antee stated that he and Ms. Antee only wanted
17 to cancel if they did not have keys by that upcoming Friday, January 19, 2018. See
18 Exhibit 4 (Exhibit A). Ms. Naw worked diligently with Bobby and Lindsey Antee, as
19 well as with the lender and seller, and closed the sale by January 19, 2018, which is
20 when Bobby and Lindsey Antee picked up keys and recorded the deed for the
21 property. See Exhibits 5-8 (Exhibit A). Ms. Naw also informed both Bobby and
22 Lindsey Antee that they could cancel after extending the closing, if they wanted.

23 Ms. Antee's accusations that Ms. Naw didn't disclose fees, or give her an
24 opportunity to review the documents, are also contradicted by the correspondences
25 between the parties, which demonstrate that Ms. Antee had ample time and
26 opportunity to review all aspects of the sale. Finally, Ms. Antee's accusation that Ms.
27 Naw violated the ethics rules by not putting Ms. Antee on the deed is completely
28 unwarranted. First, Ms. Naw had nothing to do with the decision to only list Bobby

1 Antee on the deed, as this decision was from the lender's instruction to title.
2 Furthermore, Ms. Antee willingly signed the title documents at the time of closing
3 without raising any concerns about Bobby being on title. See Exhibit 8 (Exhibit A).
4 Finally, as Ms. Antee was married to Mr. Antee, who does appear on the deed, she
5 had and has an interest in the property regardless of whether she appears on the
6 deed, and in fact, is currently in sole possession of the property, upon information and
7 belief. As such, the fact that Bobby Antee is the only party listed on the deed has not
8 had any impact on Ms. Antee's interest in or enjoyment of the property. Ms. Naw was
9 not responsible for the way that the deed was vested, and this cannot demonstrate
10 any violation of the Code of Ethics by Ms. Naw.

11 Ms. Antee alleged violations of Articles 1, 9, 12, 13, and 16 of the Code of Ethics.
12 But none of Ms. Antee's baseless accusations demonstrate any actual violation of any
13 Article, nor does Ms. Antee specify any particular violation. Article 1 requires realtors
14 to protect and promote the interests of their clients, which Ms. Naw did consistently
15 throughout the transaction that is the subject of this appeal. Article 9 requires that
16 realtors assure that all agreements are clear, and provided to their clients, which
17 again, Ms. Naw did in this case as is demonstrated by the correspondences between
18 the parties. Article 12 requires realtors to be honest and truthful. Again, Ms. Naw
19 was always honest with Ms. Antee, as demonstrated by the texts and emails between
20 the parties. Article 13 prohibits the unauthorized practice of law, and Article 16
21 prohibits conduct that is inconsistent with an exclusive representation agreement.
22 Not even Ms. Antee's accusations suggest any violation of either of these Articles, and
23 indeed, no such violation occurred.

24 Ms. Antee brings this appeal based entirely on groundless accusations, and
25 broad citation to five separate Articles of the Code of Ethics. The communications and
26 correspondences, as well as the statements of Ms. Naw and Mr. Antee demonstrate
27 that Ms. Naw diligently and loyally fulfiller her obligations to both Mr. Antee and
28 Ms. Antee. Accordingly, for these reasons, and those discussed in Ms. Naw's

SHUMWAY VAN
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Telephone: (702) 478-7770 Facsimile: (702) 478-7779

1 statements attached hereto as Exhibit A, this appellate panel should deny Ms.
2 Antee's appeal and affirm the decision of the Grievance Committee dismissing Ms.
3 Antee's ethics complaint entirely.

4
5 Dated November 20, 2018.

6
7 

8 Garrett R. Chase, Esq.
9 Nevada Bar No. 14498
10 SHUMWAY VAN
11 8985 South Eastern Avenue
12 Suite 100
13 Las Vegas, Nevada 89123
14 Telephone: (702) 478-7770
15 Facsimile: (702) 478-7779
16 garrett@shumwayvan.com
17 Attorney for Linda Naw
18
19
20
21
22
23
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25
26
27
28

Exhibit A

Exhibit A

R-9

Antee vs. Naw
Case No. 2018-910

July 12, 2018

Re: Lindsey Antee Complaint

9564 Scorpion Track

Close of Escrow: January 19, 2018

Lindsey (Liciari) Antee was referred to me in November 2017 to assist in purchasing a home. I knew of her from social media and knew that she had just lost her son to cancer. From the time I met Lindsey and Bobby Antee, I took an immediate liking to them. They were easy going and appeared to be a loving, happy couple. While showing homes to Lindsey and Bobby, I asked Lindsey how she was able to make such a big decision on buying a home since her son just recently died; she explained to me that she cannot stay in their apartment as it was too painful. I truly empathized with her and wanted to get them into a home as soon as possible. Everything was great until towards the last week of the transaction. Lindsey did a complete 180 and became a different person then I had met.

During the process, I knew they had a lot of frustrations/confusions with closing and the lender. This was nothing new. It was normal transaction headaches that we deal with. It was nothing out of the ordinary. I had to make a few calls to clear up the confusion and then things were fine again. (See exhibit#_1_) You can see here that I answered her text specifically on December 24, 2017 and told her a possible closing of "the 12th", her text to me on January 4th was that "...we should have closed by now". I called her immediately after my appointment to clear this up as I had no idea why she would think we should be closed. It was January 15th when things change in the transaction and Lindsey was threatening an attorney on the lender.

In my response, I have also attached my proof in group texts with Lindsey and Bobby Antee, as well as a letter from Bobby Antee, the husband of Lindsey Antee.

Working with Bobby:

First, I want to address the "predatory" transaction about me working with Bobby to use her money and purchase the home without her on the deed. This claim is the most ludicrous amongst the rest of her claim. I never knew Bobby Antee until Lindsey introduced him to me when we were previewing houses. Even though Bobby was the only client on the loan, I had more of a relationship with Lindsey and worked with her throughout the beginning of the transaction. When I had to make a call, I would call Lindsey as Bobby was at work. Our conversations were in a group message between the 3 of us. They were married there was no reason for me to believe that they were not communicating. The final week of the transaction, I worked mainly with Bobby as Lindsey was no longer corresponding to me, but everything was in the group text between the 3 of us. No reason for me to believe Lindsey was unaware of anything.

Lenders document request/Gift Letter:

(See exhibit #_2_)

This is lenders guidelines and request, nothing to do with me. I was helping them get their documents to the lender so that we could close on the house they wanted to buy. Lindsey was the "gifter" of the down payment and Bobby was the borrower. If the monies used for the purchase is NOT in the

purchaser's bank account for 90+ days; the lender require that wherever the money is obtained, it must be a "gift" and the "gifter" must sign the gift letter for the purchaser (name on purchase contract). This is monies that include paying off debts that the lender requires, down payment, etc. There were 3 gift letters that Lindsey had to sign according to the lender; 1) for paying off Bobby's car 2) for paying Bobby's two credit cards and 3) down payment and closing costs.

Lindsey complained that she told me and Bobby that she was willing to spend \$50,000 for the house. This is correct, she did, and I went out and helped them find a home that was within their budget as she had told me. It was them that went against my suggestion and agreed to purchase a home \$6000 higher than what they wanted to spend (See exhibit 9 in Bobby Antee's letter). I suggested to look at a home down the street since the seller was asking too much money but they both declined and said they loved the house. As far as the debts that was required to be paid off, had nothing to do with me. I am unsure of the details of this. I only helped facilitate providing the documents request towards the end. I never asked about how much debts Bobby had. This is not information I am privilege too and it's none of my business.

When they texted me of the first complaint about the lender, I called the lender to find out what was going on. The lender forwards me emails after emails of their request from Bobby and Lindsey to provide. It was clear to me that my buyers were ignoring and resisting the lender. They were very upset with the lender for requesting these documents. I knew they didn't understand the lending process, so I called Lindsey numerous times to explain and helped them get the letter of explanations for deposits and bank statements. (FYI- Letters of explanations were for random deposits that Bobby had made to his accounts and transfers of money from Lindsey's account. I have told them to not make any random deposits or transfers without asking the lender as it will create chaos with their loan when I met with them to go over the process. The lender also advised me that they told Bobby and Lindsey the same thing)

January 12, 2018

There were no signs of her having second thoughts about buying when I spoke with her. She was anxious to be in their home and was being cooperative with me. She was just frustrated with the lender/lending process. This was the point where I began being the source of communication between lender and buyers. They were pressuring me to close on the house, but they weren't cooperating with the lender. All the lender was requesting was explanations of deposits in Bobby's account and signed gift letter(s). This is very easy to provide but with clients resisting, it made this simple task extremely difficult. I kept having to reiterate what they had to do. We couldn't move forward without the documents the lender requested. I did my job above and beyond to help these clients so that they could get in their home.

Week of closing:

On Monday January 15, 2018, I called Lindsey as I knew she was upset through her text (see exhibit #_3_) When I spoke with her, Lindsey was angry and frustrated and threatened to sue the mortgage company. She demanded speaking to the underwriter in which I told her was not possible (I knew this to be true, but I still verified it with the lender). She kept telling me this wasn't true and her "attorney" told her otherwise, so I provided her the number to the COO of Valley West Mortgage and The Closing Disclosure so that her "attorney" may contact them (see exhibit # 4). She was upset

with the lender for asking for too much paperwork and claims they kept asking for the same things they had already submitted. She just wanted to close on the house. I explained to her it wasn't the lender or myself delaying their closing. It was them not cooperating with the lender, but I understand that this whole process can be so confusing. She appeared concerned about where she was going to live because they had to move out of their apartment, so I also explained that we were just days away from closing and that I can help them find a place to go. I also told them to ask their apartment if they could stay a few more days. At this point, I was really confused and wondered what the real reason was for her upset as few days earlier she was excited and cooperative. At the end of the conversation, Lindsey said she wanted to cancel. I followed her demand and started to draft cancellation. I followed up with a text to her and Bobby shortly after our conversation and advised them I was drafting the cancellation (see #_4_).

Bobby Antee responded back that if they don't have keys by Friday, they will turn in the cancellation. I am again now confused. I thought that maybe they were angry and just making threats to cancel but they really didn't want too. I went on to explain via our group text that to keep moving forward I would have to send them over an extension of escrow. I also went on to explain why we needed this as they did not understand. I then tried to call Bobby, in case my text was confusing but got no answer, so I texted him again. He confirmed for me to keep moving on with the loan, so this was exactly what I instructed the lender to do. I also informed them that if they wanted to cancel after the extension is signed, they still can. We then worked to complete the lender's request, so we could close by Friday. I had no reason to believe that he and Lindsey was not in communication together as everything was all communicated through our group text (See #_5_) From this point on, the only communication I had from Lindsey was when she sent me the gift letter via text, day before signing.

Signing/Deed:

On Tuesday January 16, 2018, I texted the group message that I needed to set up signing for them both. (See #_6_) Bobby responded that Lindsey was out of town, so I offered to send a mobile notary, but he said she would be back by midnight, so I went on to set up their signing for 10am the following day. We were still in need of the gift letter to be faxed to the lender, but Bobby advised me that Lindsey was trying to send me the gift letter, so I texted her to follow up and asked for a picture, so I can send to lender. She responded with the photo (See #_7_). This was the only communication I had with her since Monday January 15th. It was only Bobby responding to all requests from lender. I assumed she no longer wanted to deal with it and put him in charge. Lindsey did not have to sign the gift letter(s) nor continued to cooperate with the lenders request if she truly wanted to cancel. Since she was cooperating and at the instructions of Bobby, her husband; everyone moved forward.

Wednesday January 17, 2018

Signing day comes and Bobby texts me that Lindsey was not feeling well and did not want to go to the signing so again I tried to accommodate and asked if they wanted me to send a notary to the apartment. Bobby showed up to signing alone. Right before the signing, Lindsey sent Bobby a letter that if they were to divorce, he would agree to pay her back \$75,000. Bobby was confused and upset. He told me he loved his wife and he's not divorcing her, so he signed the letter. Lindsey knew that Bobby was at the signing for the house. In her complaint, she claims that Bobby and I knew she was "mentally not ok" but clearly, she was sane enough to draft a letter of repayment from him. She was also sane enough to go to the bank to wire the down payment and walk into the title company to sign the deed. Bottom line is if

3
R-12

she was that uncomfortable, she should never have wired the funds after the fact and go into title to sign the quit claim deed.

I thought Lindsey's behavior was due to her grieving her son's death and that the move was hard on her. Even though she told me it was too painful to be in that same apartment, I could understand how difficult it would be to move as well. I never once thought that she didn't want the house. After Bobby signed the closing documents, he was given wire instructions for the down payment. To close on the house, Lindsey would have to wire the down payment and still go into to title and sign the deed. Since Lindsey was not communicating with me, I had no idea when she went to title to sign nor when she wired the funds until the escrow officer emailed me the update. I never called/text to pressure her to wire funds or go in to sign the deed. This was up to Bobby and her to complete the process at this point.

Lindsey also made another claim that she dropped off the check to title (it was wired) and asked title where she is to sign but they just took her check and said she didn't have to sign anything. This is a lie. See attached exhibit # 8 of the deed and the letter from the title company stating that Lindsey signed the quit claim deed with the notary on January 17, 2018. Lindsey has always known that she needed to sign off on the deed. I had explained this many time through text, in person and via phone. See exhibit # 1 Pg. 2.

According to Bobby's letter (See exhibit # 9), he has no problem adding her to the deed, but they are now in the middle of a divorce and the attorneys are handling their property. Since they were married when it was purchased, the property belonged to them both whether she is on title or not. There was no malicious planning to use her money to purchase a home without her on it. They were told the instructions, they just didn't listen. Lindsey claims "she made it clear" she wanted to be on title. We never had this conversation ever HOWEVER we wouldn't need too. Whenever a married couple purchases a home together and the other spouse can't be on the loan, I explain to them the title process so that they are aware that they both will need to be available to sign at closing. But just like the whole purchasing/loan process, everything falls on deaf ears and gets lost. How buyers take title is not my job as a REALTOR® to determine nor am I in charge of making sure someone is on title. This is what the title company is for and this is what they review with the clients at signing. Because Lindsey cannot be on the loan, she cannot initially be on the deed/title. This is a lender's Insurance/title guideline not mine. They would have to go to sign another quit claim deed after closing to add her to the home. Even though she is quit claimed off the deed at closing, because they are married; community property law still applies. In conclusion, there was zero harm done to her by her not being on the deed initially as no matter what, she still owns 50% of that home. She basically entered a failed marriage and now wants a refund for everything.

Tuesday June 26, 2018

Lindsey claimed that she called me to "confront" me and that my response was "I sold Bobby a home not you". This is a lie...again. We never spoke. She texted me about the deed and threatened to sue me. Please see the attached exhibit # 10 with my response. I was so upset at the fact she was threatening suit out of nowhere again that I initially thought she wrote that "I bought a home with Bobby WITHOUT her knowledge" so I responded with "I did not buy a home with Bobby without your knowledge, Bobby and you purchased a home..." I stayed professional and kept it short, I knew there was no reasoning with her. I have followed her for a while on social media and I wasn't going to be one of her victims that she rants and slander. Sure enough, within an hour, she took to social media to

Antee vs. Naw
Case No. 2018-910

slander/lie about me and have her followers attack me (See exhibit# 11) I advised my broker immediately of what had transpired this day.

Additional Evidence


I knew my clients didn't understand the process especially with the lending part of it. Just like how Lindsey stopped her communication with me, Bobby and Lindsey both stopped communication with the lender, so I was the middle man trying to help the process and staying in communication with everyone. I knew they wanted the house. It was my job to see them through. No matter how much I explained the process and held their hands through, they just didn't get it. I tried on two separate occasions to bring them both in and explained the process again, but they declined and said they were fine (See exhibit _12_)

If you need additional information from the lender or the title company, below is their contact info.

Valley West Mortgage- Drew Levy (702) 531-4909

Stewart Title- Nikki Bott (702) 331-6900

Sincerely,



Linda Naw

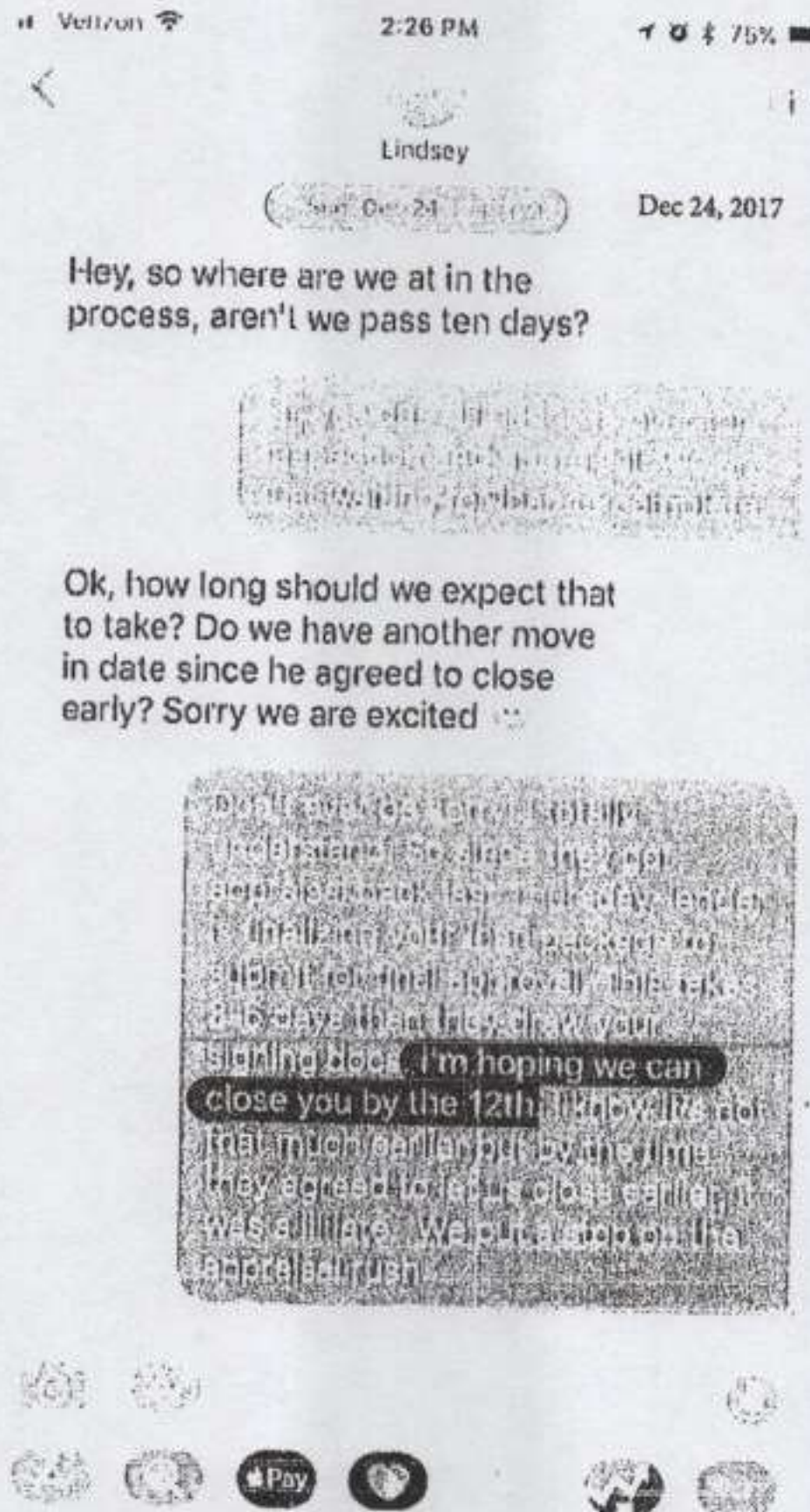
⁵
R-14

EXHIBIT 1

Linda Naw | ERA Brokers Consolidated

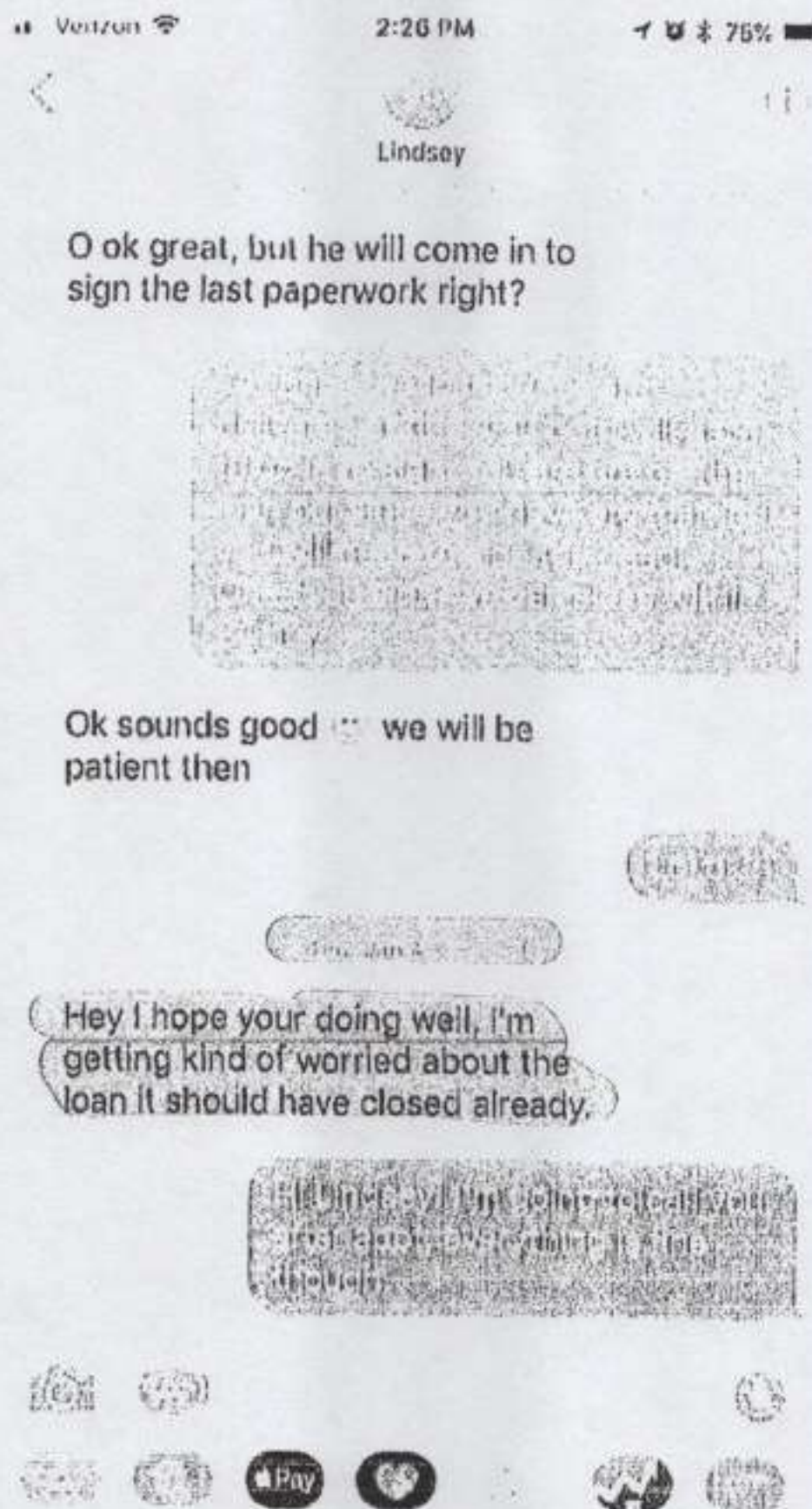
Evidence
Antee vs. Naw

P-15



R-14

Exhibit #1



Jan 4

She said we should be closed although I explained in the previous text that the 12th would be earliest.

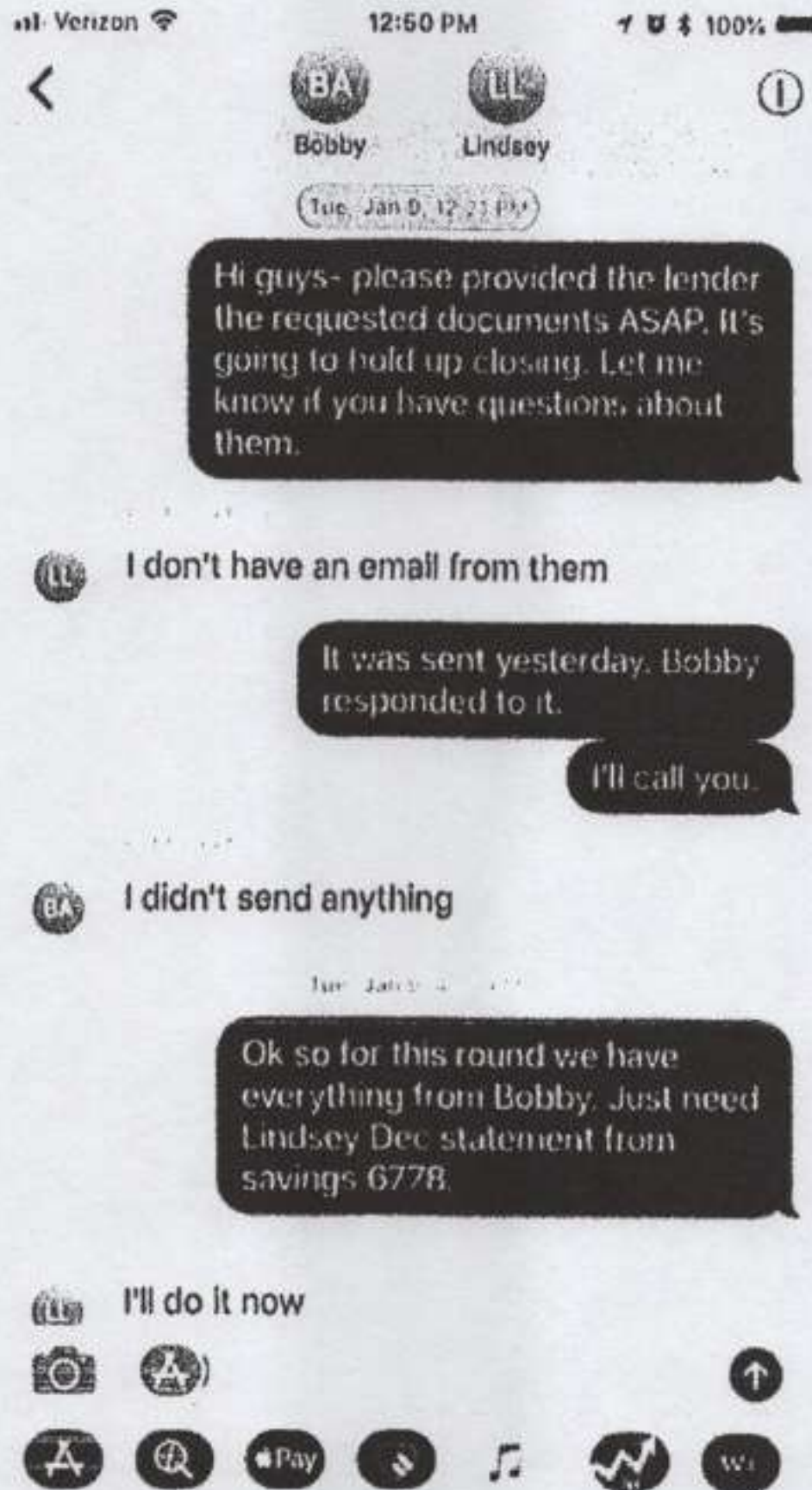
2-17

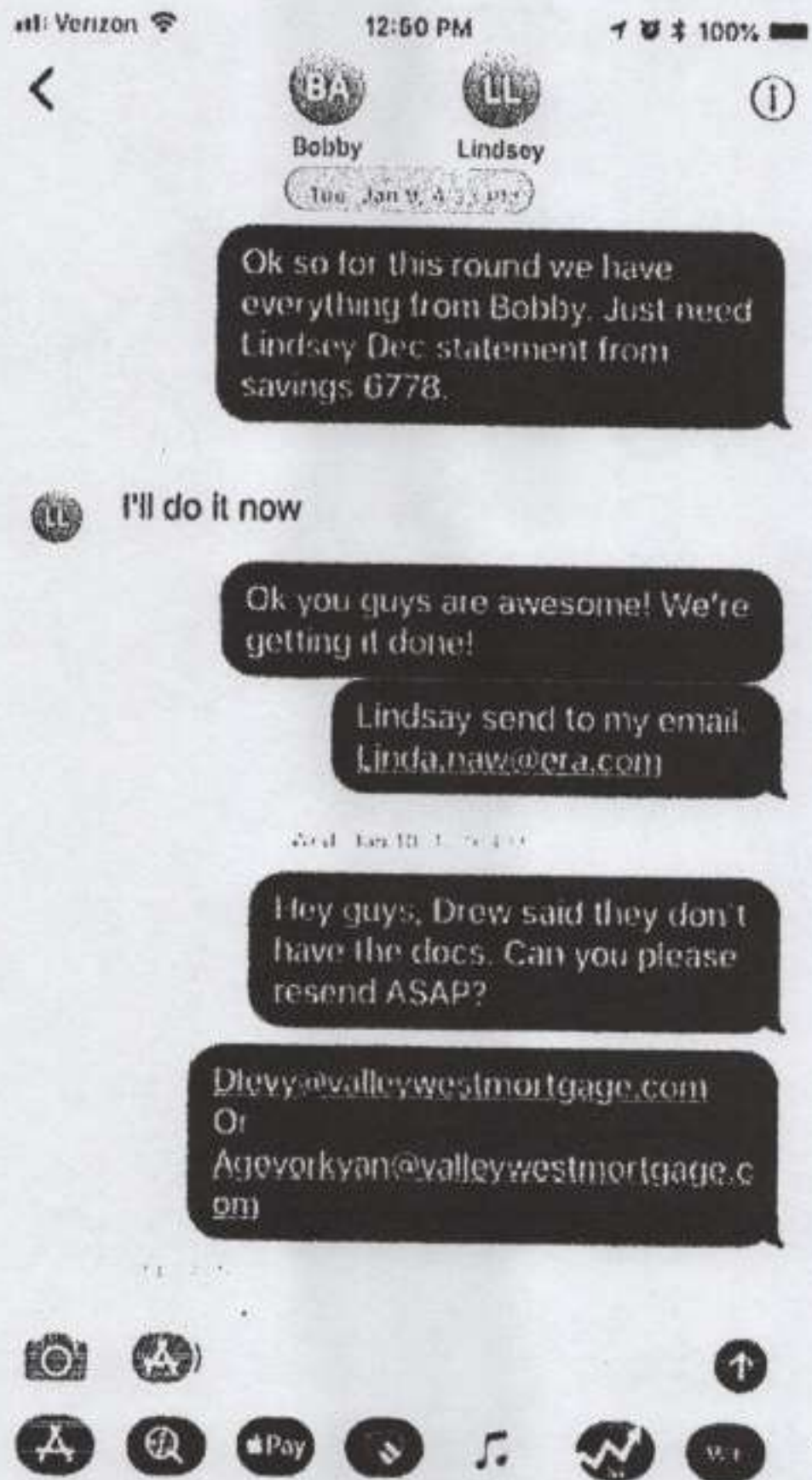
EXHIBIT 2

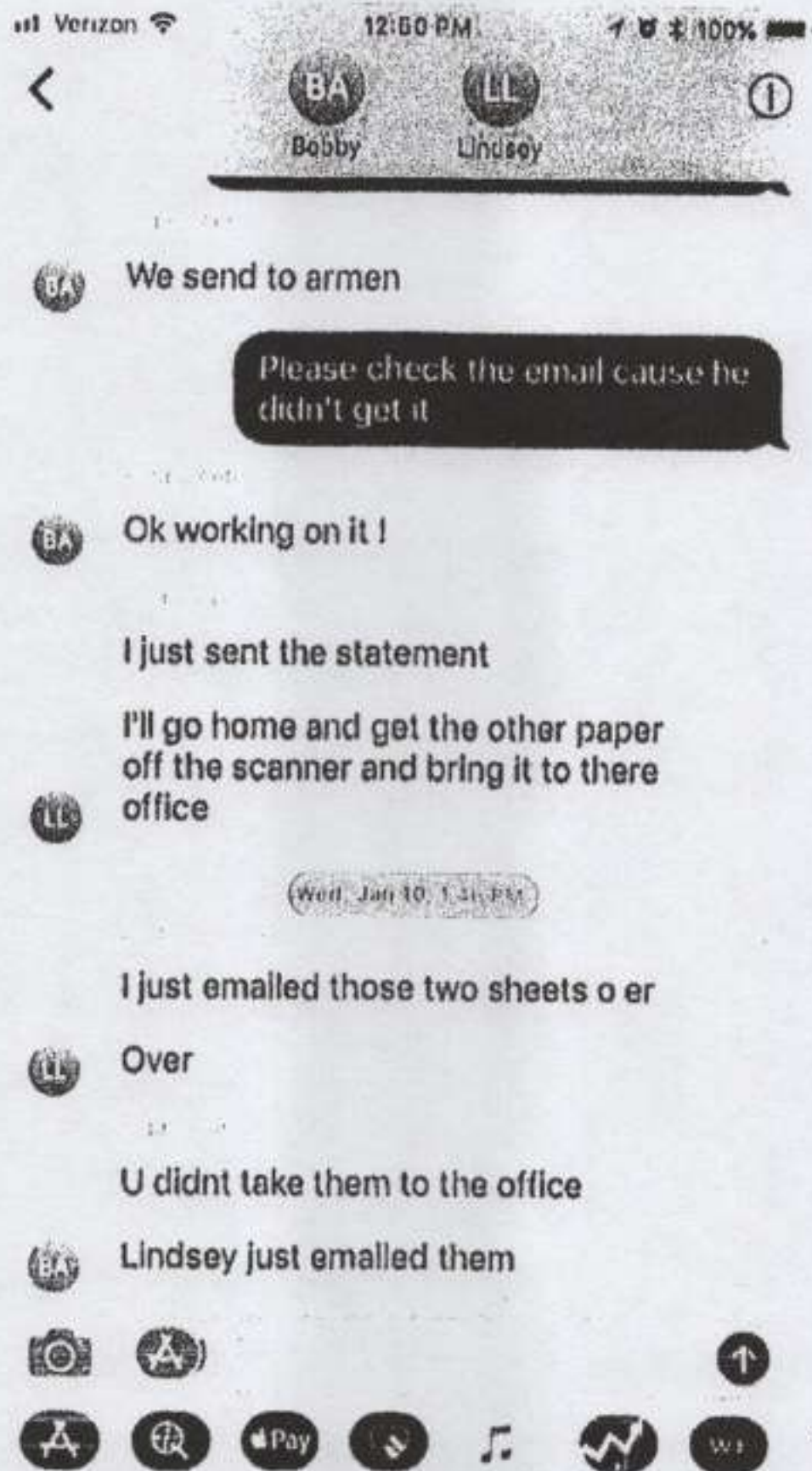
Linda Naw | ERA Brokers Consolidated

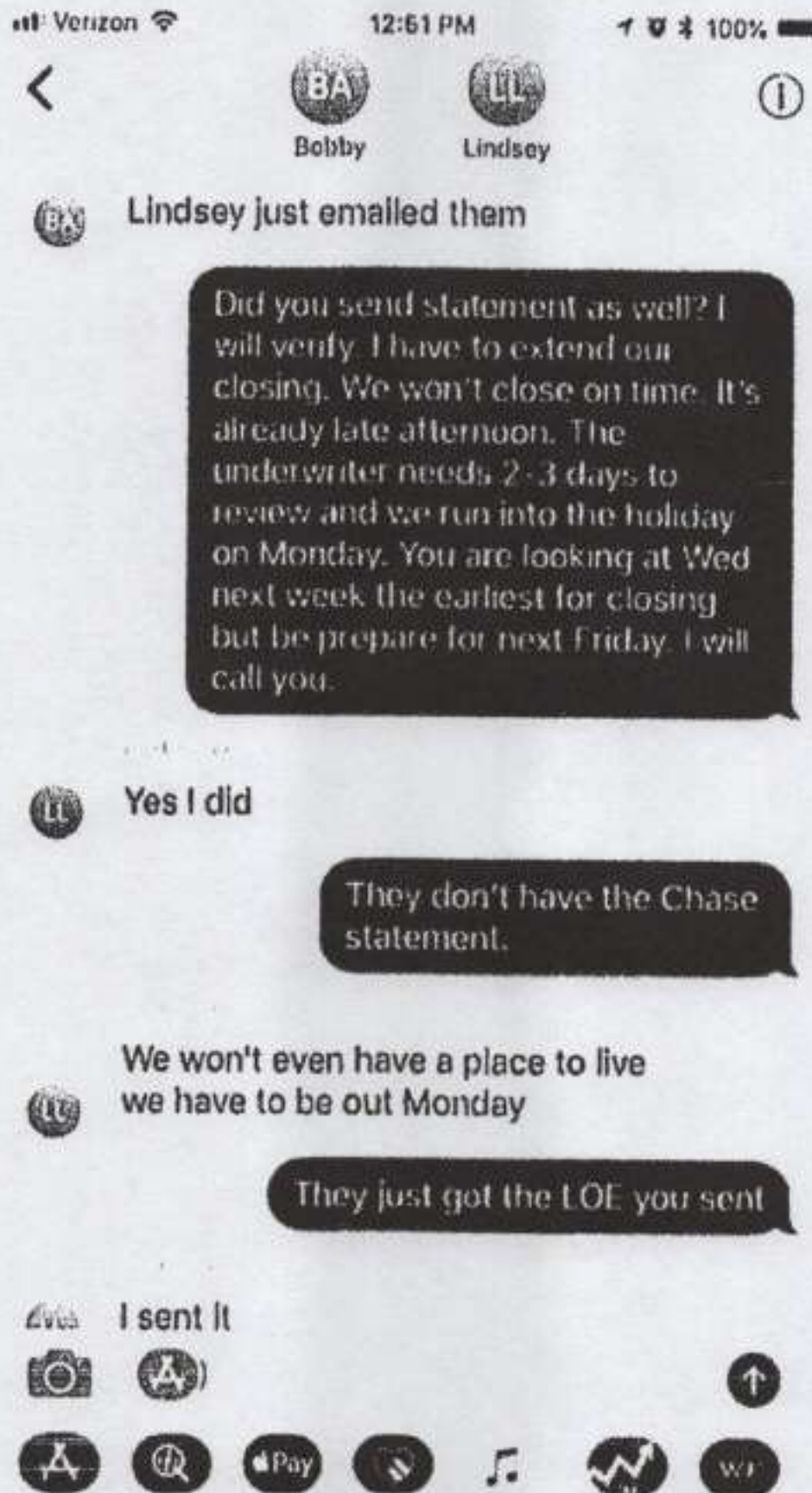
Evidence
Antee vs. Naw

P-18

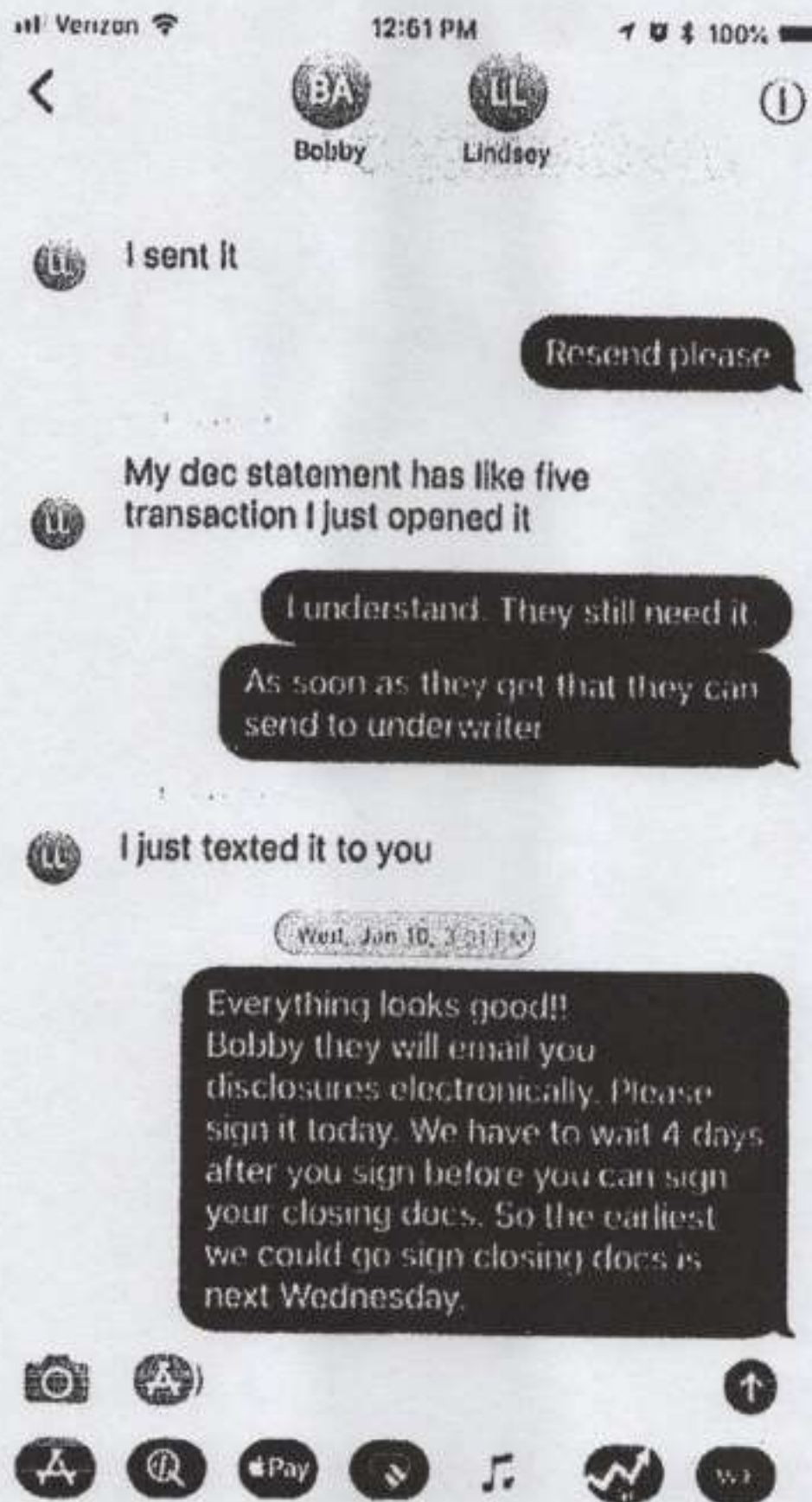








P-22



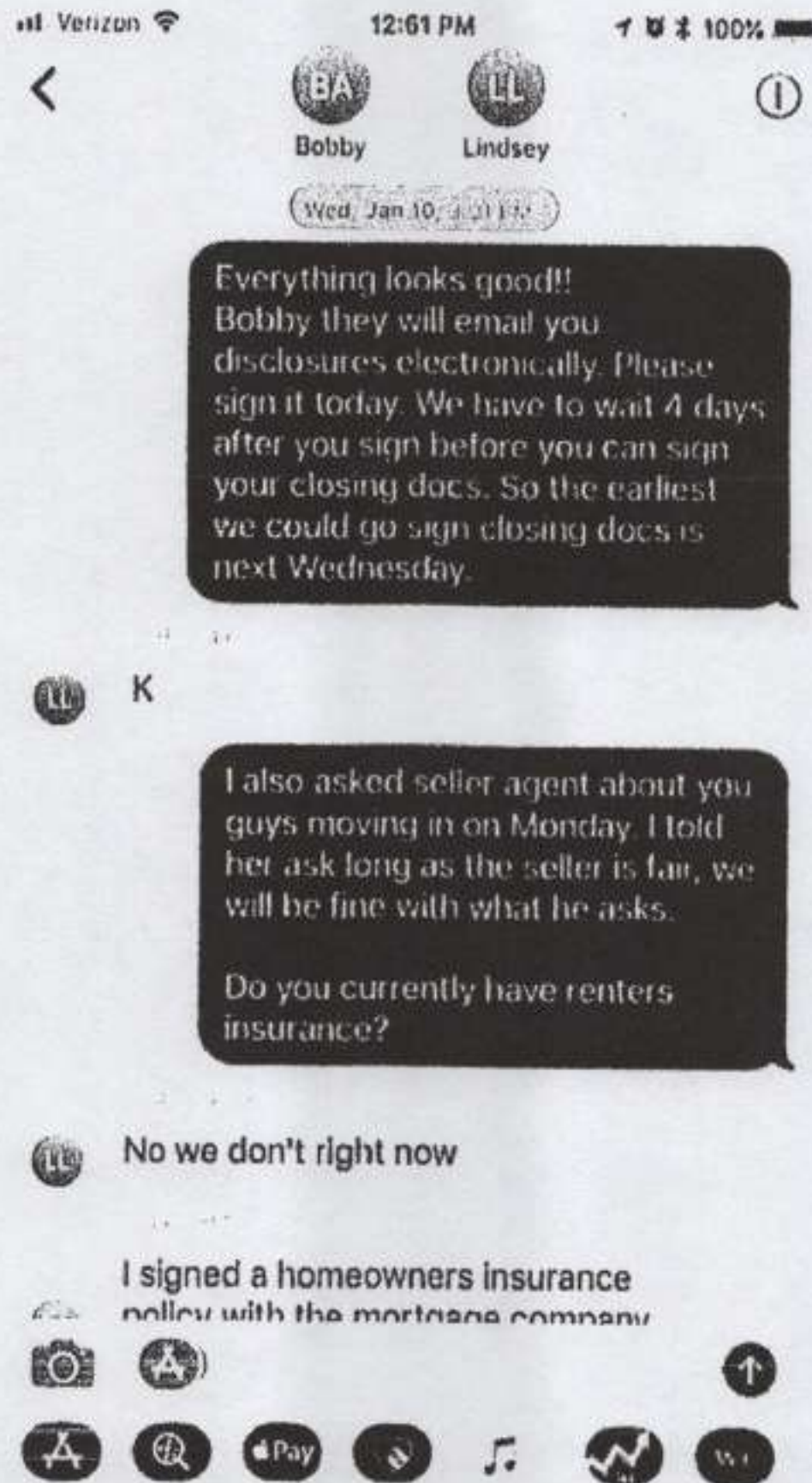
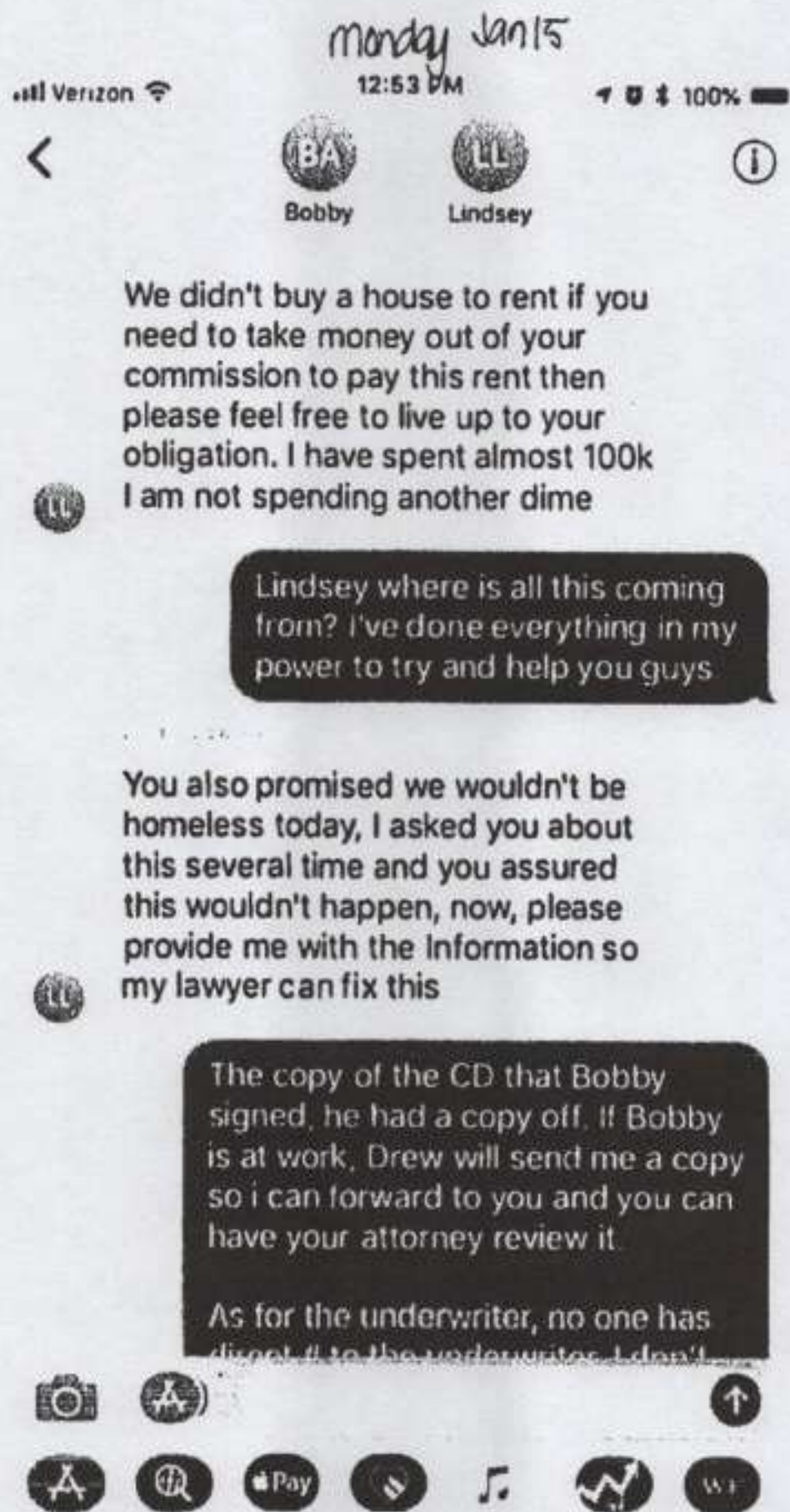


EXHIBIT 3

Linda Naw | ERA Brokers Consolidated

Evidence
Antee vs. Naw

R-25



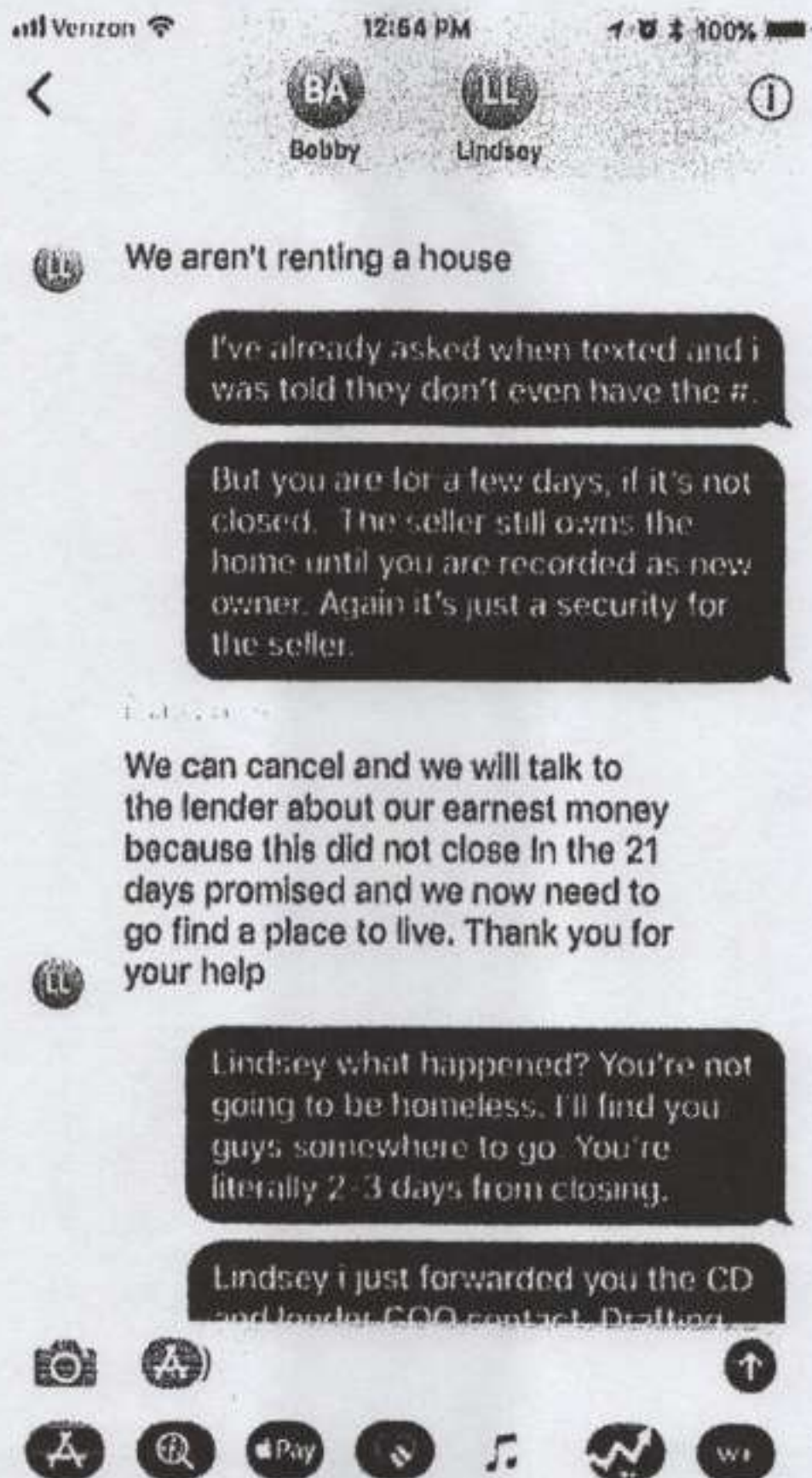


EXHIBIT 4

Linda Naw | ERA Brokers Consolidated

Evidence
Antee vs. Naw

P-28

Verizon 12:54 PM 100%

Bobby Lindsey

Drafting cancellation now

Lindsey Uciarl-Antee

Thx

Bobby Antee

If we don't have the keys by friday we will turn it in

Extension for?

R-29

Linda Naw

From: Linda Naw
Sent: (Monday, January 15, 2018 12:07 PM)
To: (lindseyLicari14@aol.com)
Cc: bobbyantee@gmail.com
Subject: FW: Bobby Antee CD
Attachments: Bobby Antee CD.pdf

Lindsey- attached is the Closing Disclosure that Bobby signed. Below is the phone # for the lender that your attorney can contact.

Valley West Mortgage
(702) 696-9900
Contact: COO JR

Kind Regards,

Linda Naw, 2017 President of the Women's Council of Realtors®



2855 St Rose Parkway Suite 100 Henderson, NV 89052
D (702) 306-3587 F (702) 933-9046
Linda@NawRealEstateGroup.com | LindaNaw.com

Assistant: Marie Mickelson
D (702) 966-6018 | Marie@NawRealEstateGroup.com

See how Women's Council of REALTORS® can help you serve your client better. Join us today at wcr.org

"I am an advocate for funding more money to childhood cancer research. Join me in giving these children a chance for tomorrow. Donate today to Combat for a Cure Foundation"



www.combatforacure.org

Combat for a Cure Foundation is officially a proud research partners with St Baldrick's Foundation.

From: Drew Levy [mailto:dlevy@valleywestmortgage.com]
Sent: Monday, January 15, 2018 11:58 AM
To: Linda Naw <Linda@NawRealEstateGroup.com>
Subject: Bobby Antee CD

Hi Linda,
Attached is a copy of Bobby Antee's CD. As previously discussed, these are not the final title fees. Fees are subject to change.

Please let me know if you have any further questions.



Drew Levy
Call Center Supervisor

VALLEY WEST MORTGAGE

9580 West Sahara Avenue, Suite 200 | Las Vegas, NV 89117
Tel (702) 696-9900 ext: 107 | Toll Free (888) 931-9444 | Fax (702) 436-2400

[website](#) | [map](#) | [email](#)

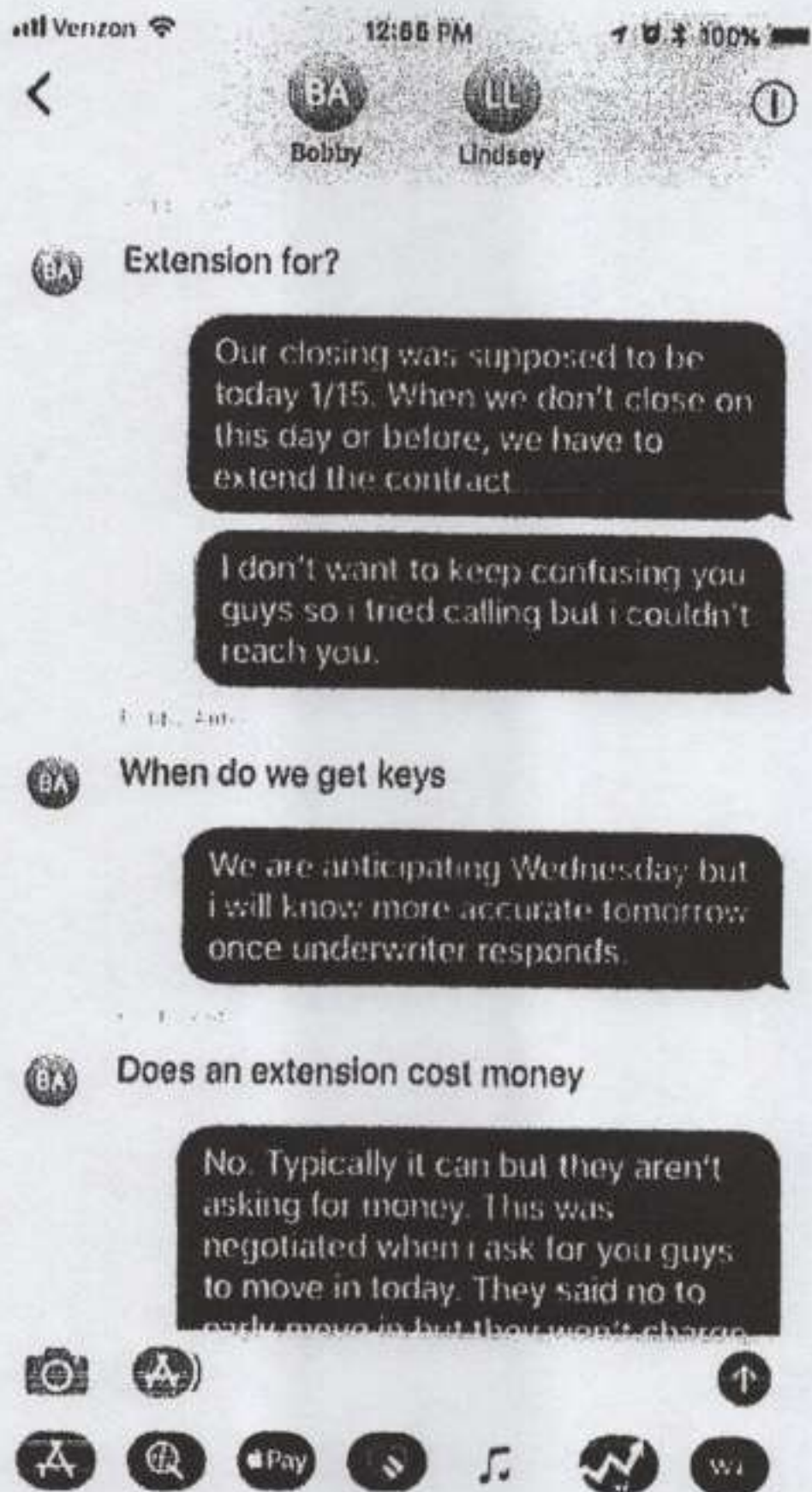


MORTGAGES WITHOUT OBSTACLES

► Get a Quote

NMLS company number: 65506 | [Send Me Files Securely](#)

Confidentiality Note: The information contained in and transmitted with this communication is strictly confidential, is intended only for the use of the intended recipient, and is the property of Valley West Mortgage or its affiliates and subsidiaries. If you are not the intended recipient, you are hereby notified that any use of the information contained in or transmitted with the communication or dissemination, distribution, or copying of this communication is strictly prohibited by law. If you have received this communication in error, please immediately return this communication to the sender and delete the original message and any copy of it in your possession.



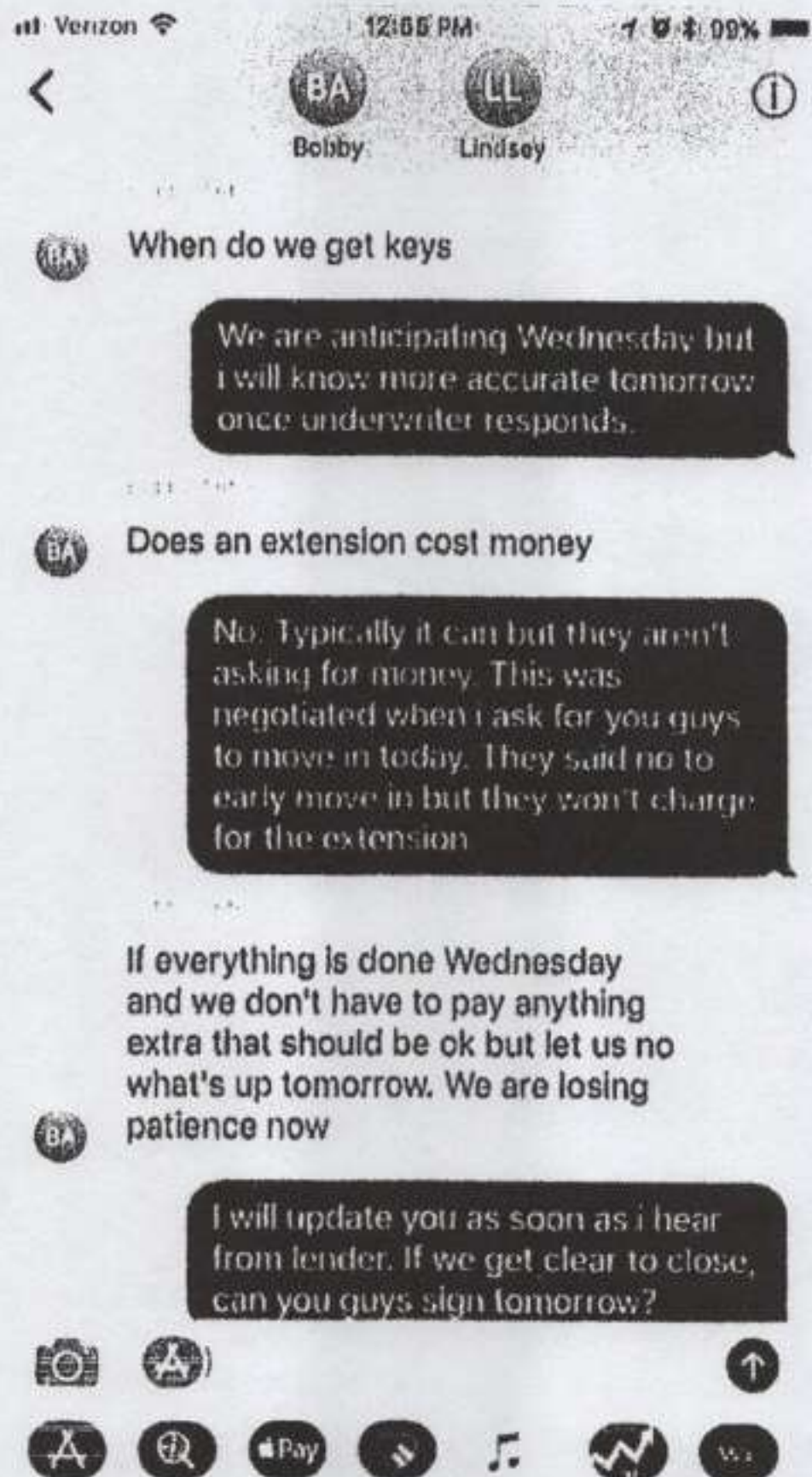
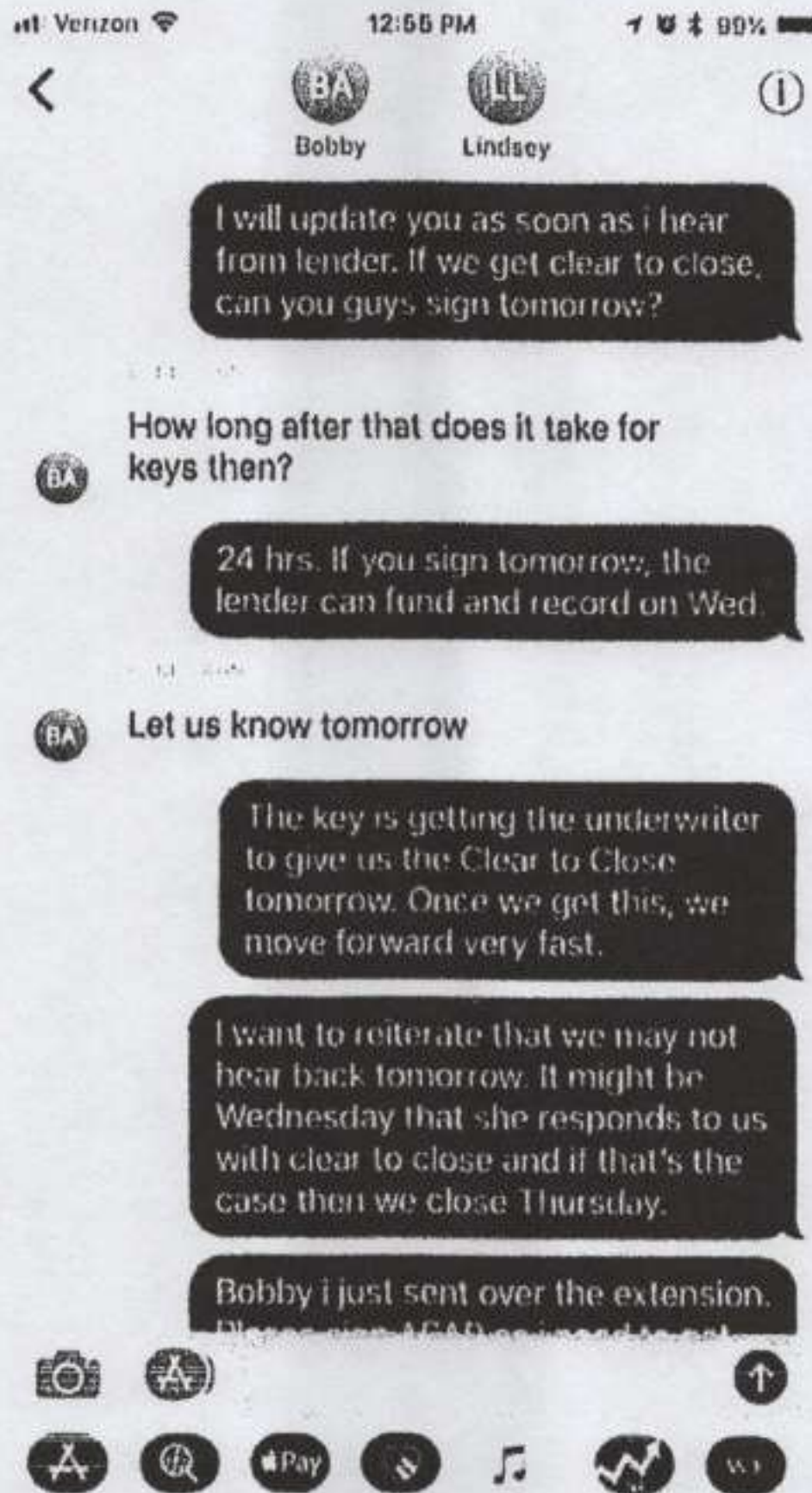


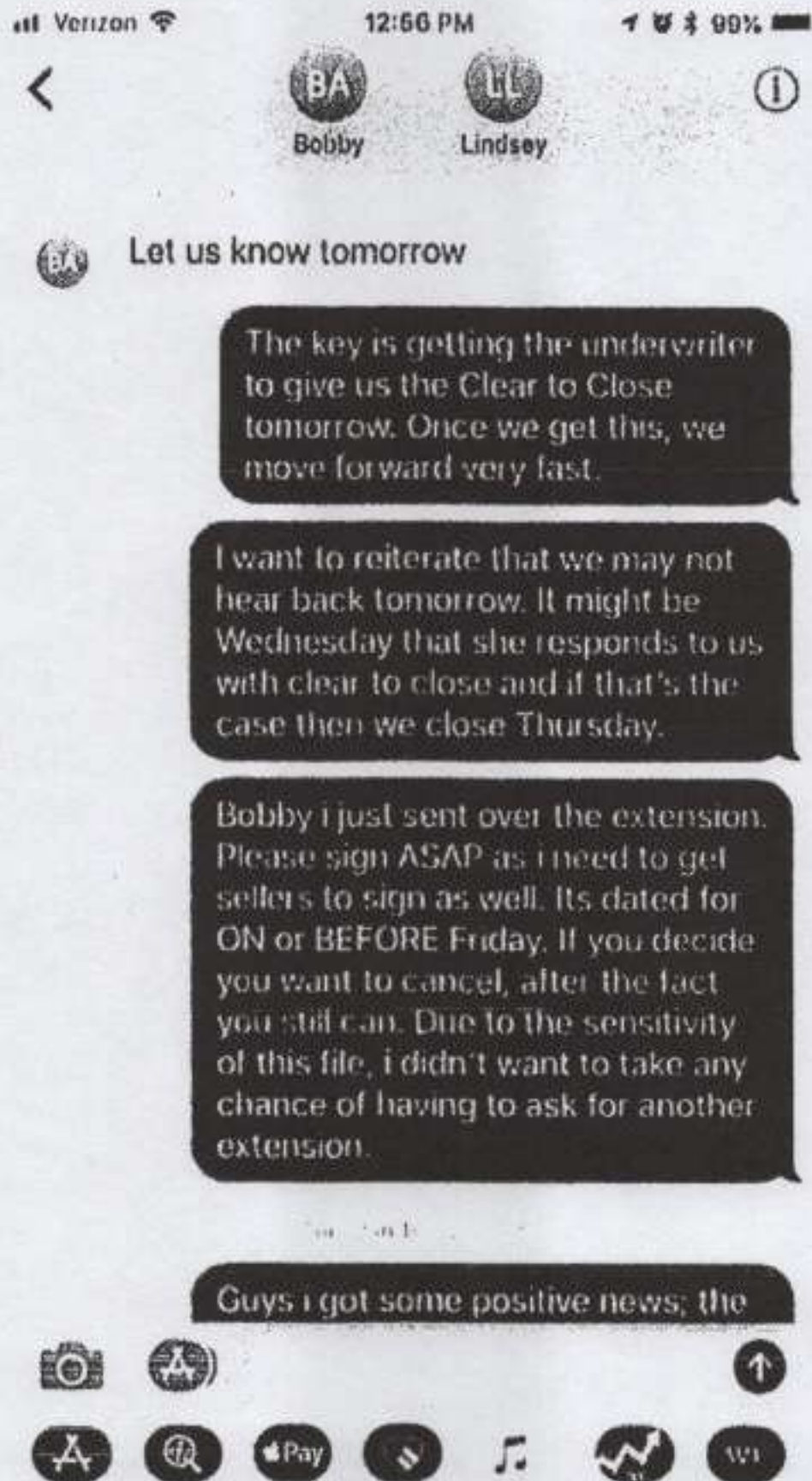
EXHIBIT 5

Linda Naw | ERA Brokers Consolidated

Evidence
Antee vs. Naw

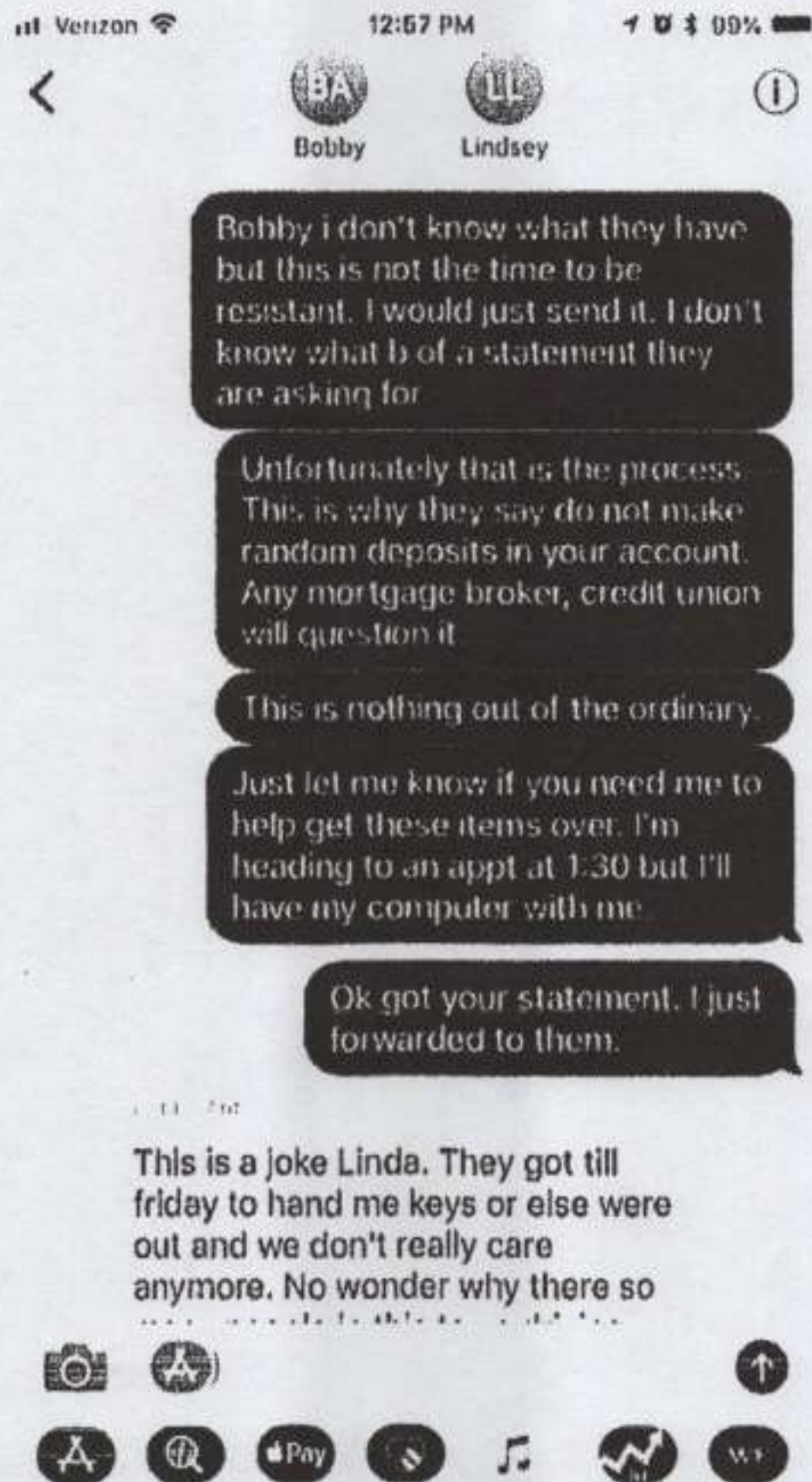
12-34

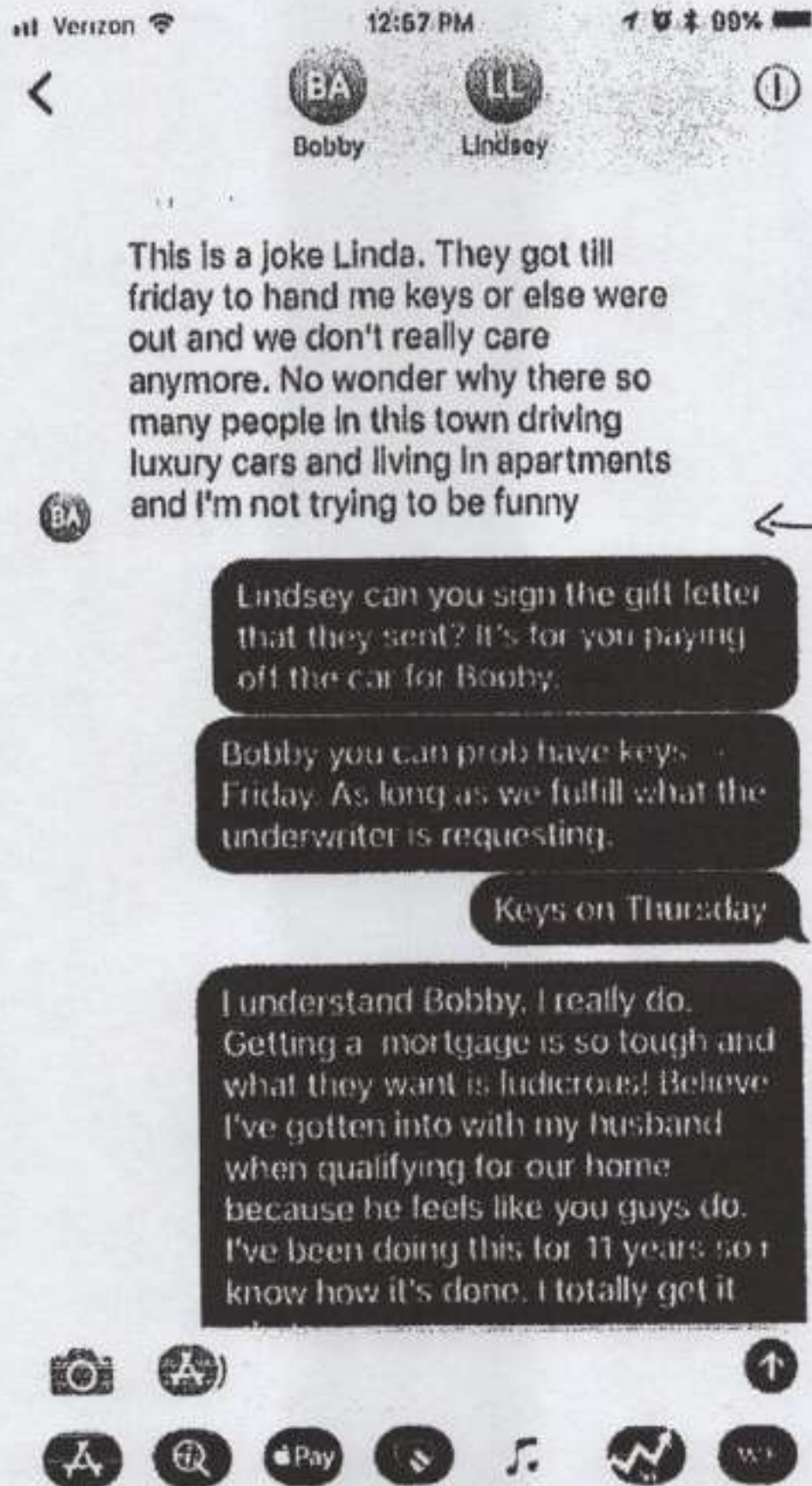




(They were made aware that they could still cancel if they change their mind after they sign the escrow extension.)







← I called him after this text.

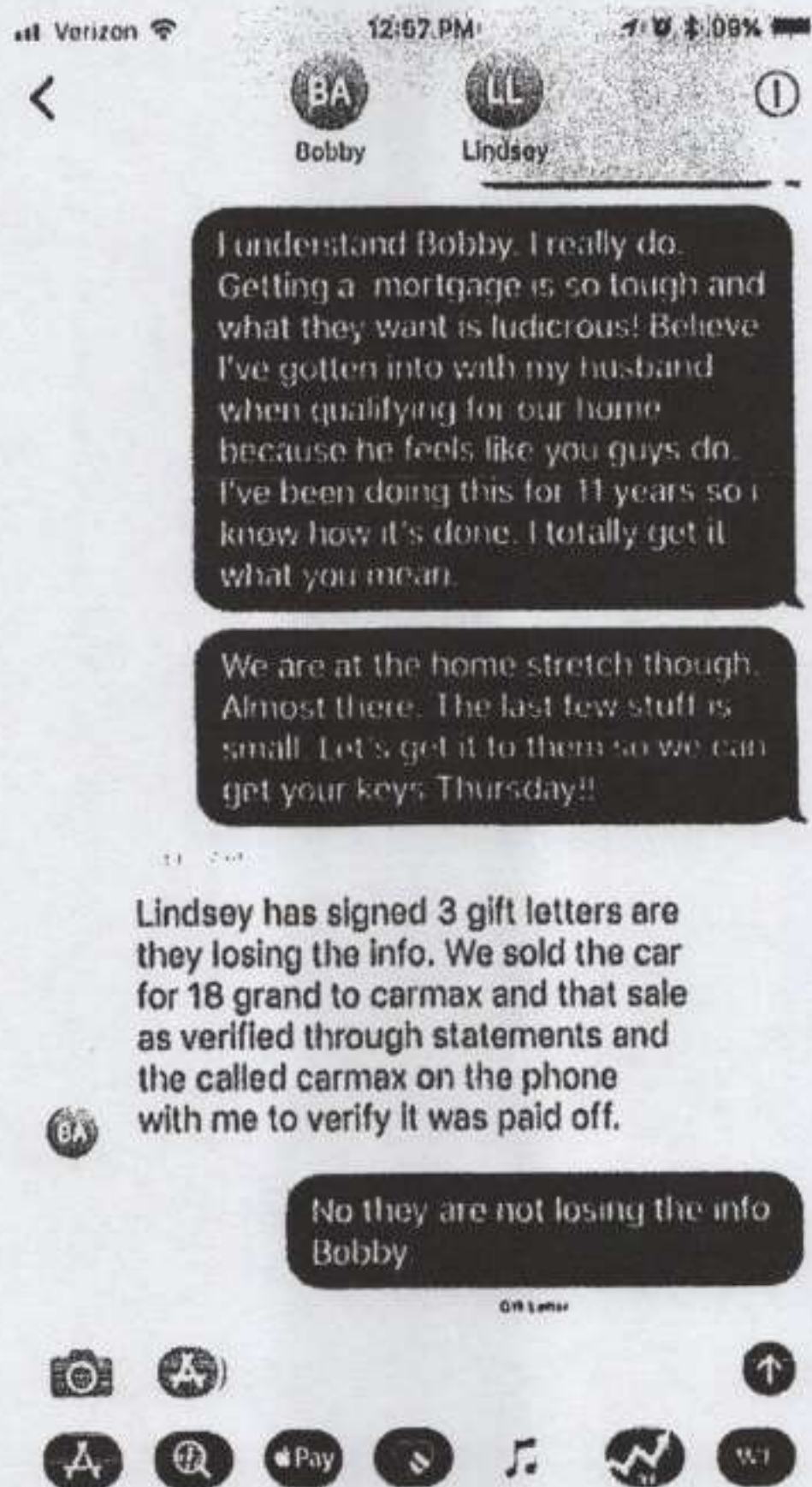
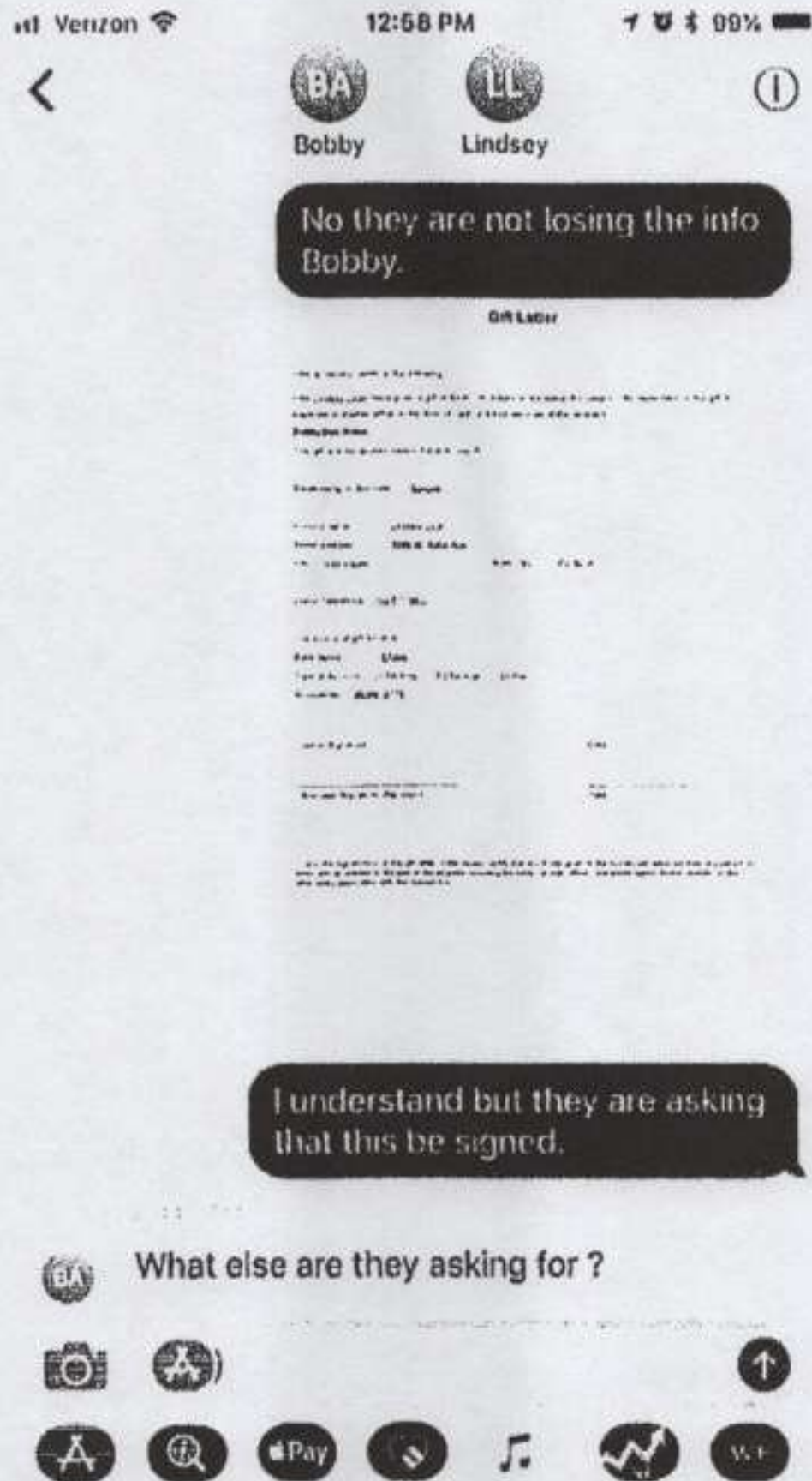


Exhibit #5



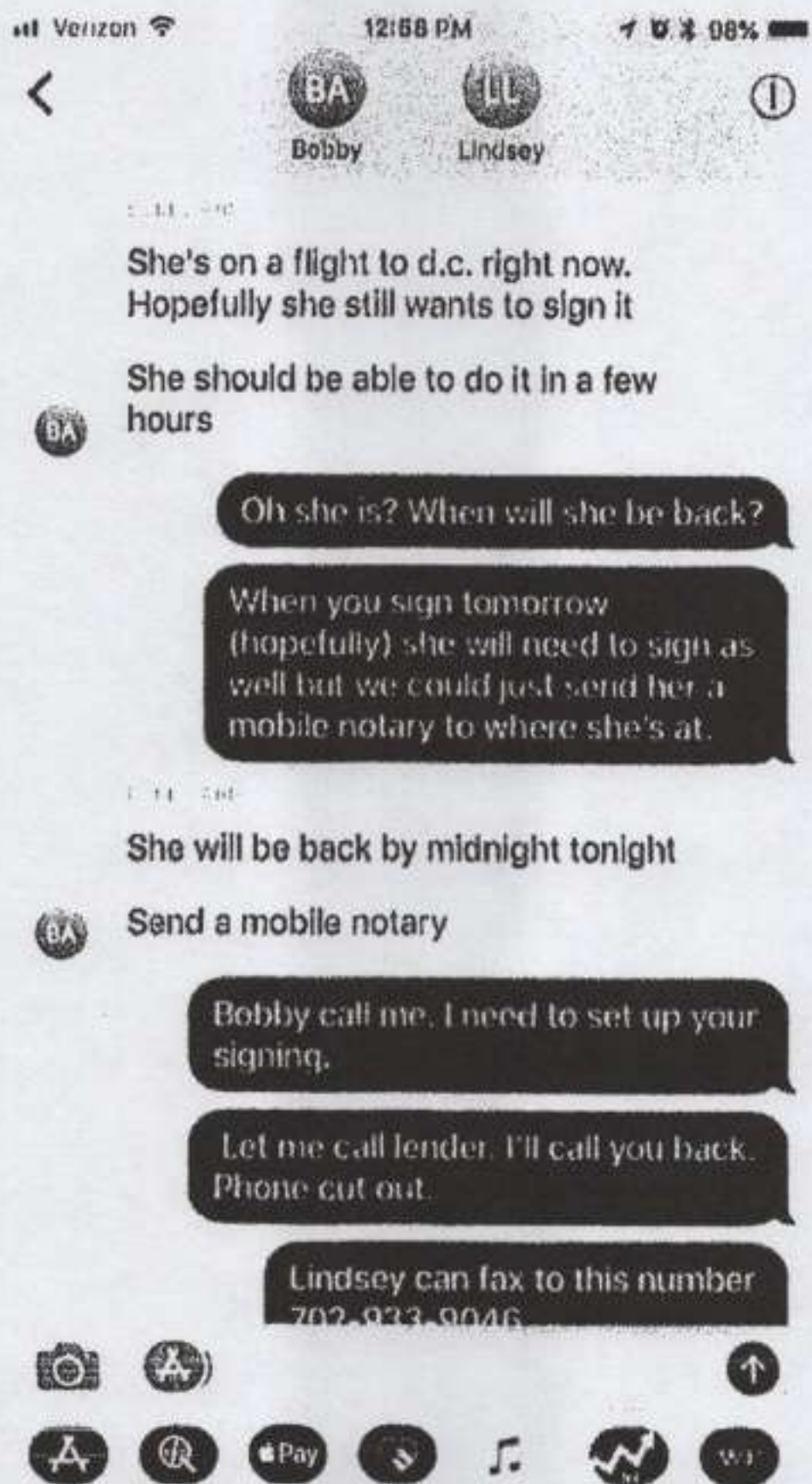
R-41

EXHIBIT 6

Linda Naw | ERA Brokers Consolidated

Evidence
Antee vs. Naw

R-42



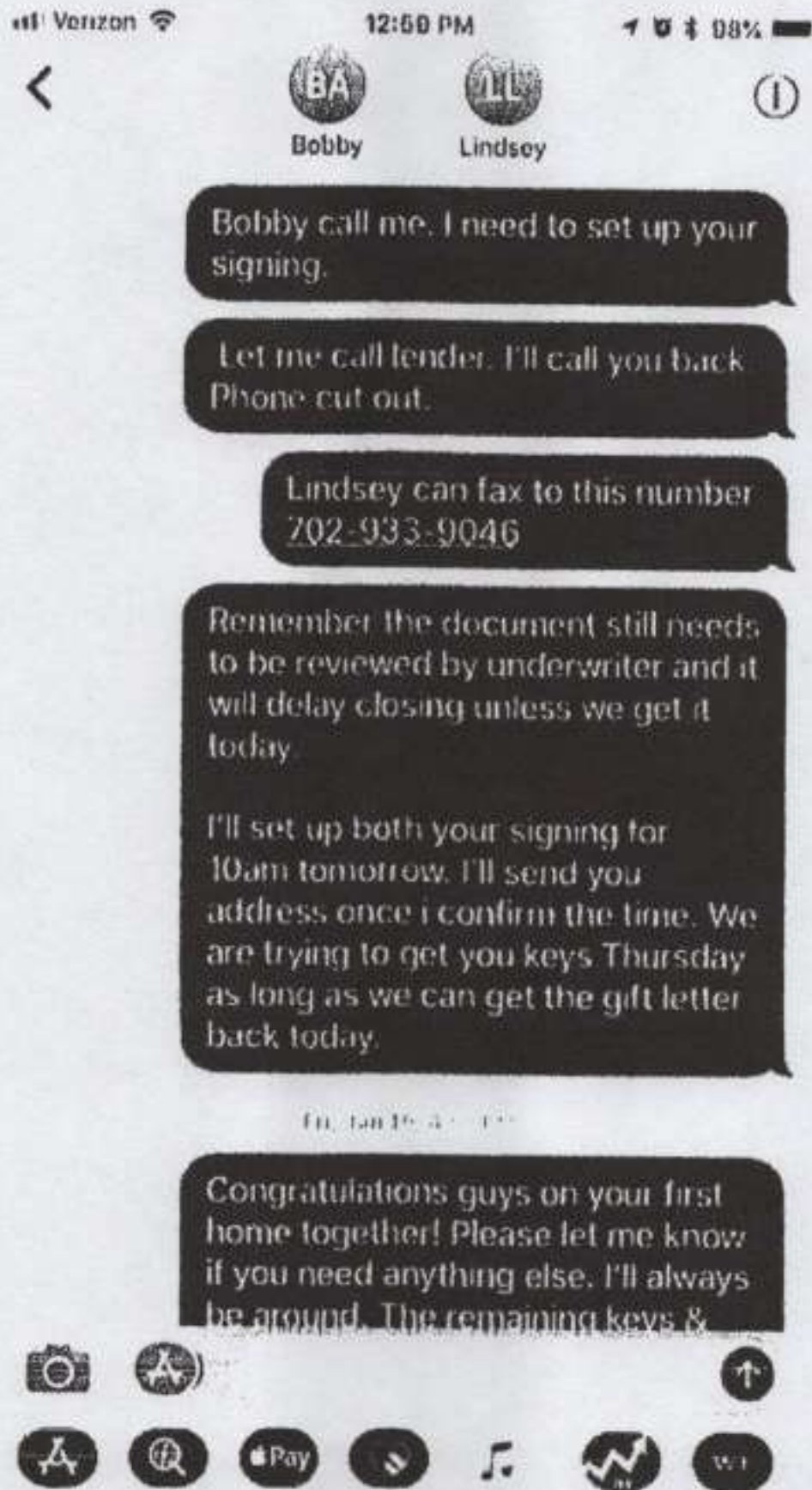


EXHIBIT 7

Linda Naw | ERA Brokers Consolidated

Evidence
Antee vs. Naw

P-45

EXHIBIT 8

Linda Naw | ERA Brokers Consolidated

Evidence
Antee vs. Naw

R-47

Inet #: 20180119-0001324

Fee: \$40.00

RPTT: \$0.00 Ex #: 006

01/19/2018 12:06:10 PM

Receipt #: 3301102

Requestor:

NATIONAL TITLE COMPANY

Recorded By: OSA Pgs: 4

DEBBIE CONWAY

CLARK COUNTY RECORDER

Src: ERECORD

Ofc: ERECORD

A.P.N. #	176-20-413-076
Escrow No.	17009321-003-NB1
R.P.T.T.	Exempt #5
Recording Requested By:	
National Title Co.	
Mail Tax Statements To:	<i>Same as below</i>
When Recorded Mail To:	
Bobby Dee Antee	
9564 Scorpion Tract Ct	
Las Vegas, NV 89178	

GRANT, BARGAIN, SALE DEED

THIS INDENTURE WITNESSETH: That for valuable consideration, the receipt of which is hereby acknowledged,

Lindsey Licari spouse of grantee

does hereby Grant, Bargain, Sell and Convey to

Bobby Dee Antee a married man as his sole and separate property

all that real property situated in the County of Clark, State of Nevada, bounded and described as follows:

FOR LEGAL DESCRIPTION, SEE ATTACHED EXHIBIT "A"

SUBJECT TO:

1. Taxes for fiscal year;
2. Reservations, restrictions, conditions, rights, rights of way and easements, if any of record on said premises.
3. Together with all and singular the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining, and any reversions, remainders, rents, issues or profits thereof.

The undersigned, by his/her execution of this Deed, does hereby acknowledge and agree that he/she shall forever relinquish any and all rights, title and interest he/she may have had in and to the subject property by means of Community Property Law.

See page 2 for signatures of Grantor(s) and Notary Acknowledgment

Escrow No. 17009321-003-NB1
Grant, Bargain, Sale Deed... Continued

Dated this 17 day of January, 2018

Lindsey Licari
Lindsey Licari

State of Nevada

County of Clark

This instrument was acknowledged before me on

1/17/18

by: Lindsey Licari

Signature:

[Signature]
Notary Public

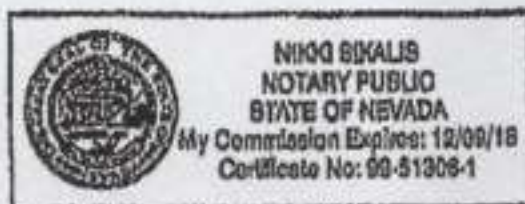


Exhibit #8

Escrow No. 17009321-003-NBI

EXHIBIT "A"
Legal Description

Parcel One (1):

Lot Seventy Six (76) in Block Five (5) of SOUTH MOUNTAIN LOT "B", as shown by map thereof on file in Book 123 of Plats, Page 55, in the Office of the County Recorder of Clark County, Nevada.

Parcel Two (2):

A non-exclusive easement for ingress, egress, use, enjoyment and public utility purposes, on, over and across the private streets and common areas on the map referenced hereinabove, which easement is appurtenant to Parcel One (1).

R-50

EXHIBIT 9

Bobby Antee Letter

Linda Naw | ERA Brokers Consolidated

Evidence
Antee vs. Naw

R-51

July 17, 2018

To whom it may concern,

My name is Bobby Antee. I am writing this letter to let you know my experience with our realtor Linda Naw against the false claims of my wife Lindsey Antee. Lindsey and I was referred to Linda through a friend of the foundation Aydens Army of Angels. From the beginning, Linda took us around to look at homes all over Las Vegas. She had so much patience with us, helping with whatever we were looking for in the price range we could afford and answering any questions we had. We ended up finally finding a home we liked and thought it be great for us. The seller wanted more money than what it was listed for and Linda advised us to just keep looking as they were asking for too much but we wanted the house even though it was more than we initially planned on spending so she helped us get our offer accepted and we were happy!

As first-time buyers going through the home buying process was a long and frustrating experience with all the paperwork that was asked from the lender. My wife knew she couldn't be on the loan due to her credit but she was the one that was putting the down payment. On paper I don't make a lot of income because I'm a tipped employee so we knew we had put a huge down payment. I was only qualified for \$200k and the house was \$256k. The plan was to buy our starter home and stay in it for 2 years so she can file her bankruptcy then we would move into something more spacious. This was our plan. We decided to invest in a home rather than pay \$20k in rent to an apartment.

The mortgage company after running my credit said that I would have to sell my car in order to get qualified. Then right before the closing they told us that we had to pay off my student loans and 2 credit cards which came out a little 11k. My car was upside down \$4000 which my wife paid off. The student loans came out of the down payment from the house. Lindsey had to sign multiple gift letters for the money she gave me for the house. It was very frustrating on our end but this had nothing to do with Linda. She was great in being an assistant and answering questions. She had to step in and help us get all the correct paperwork to the lender so we could close on our home.

The week of closing Lindsey was starting to get worried because the mortgage company hadn't called us with our approval and kept asking us for the same statement and gift letters. So she told me to deal with it. I told her to be patient that we were getting the house and not to worry so much. Linda and I communicated about our loan and closing through our group text until the end. Lindsey can't say she knew nothing about this. I went into the title company alone because she didn't want to go. Linda told us that we both needed to sign regardless if Lindsey was on the loan or not because we were married. She said she can send Lindsey a mobile notary. While I was there at the signing she sent me a contract for repayment of \$75K for the down payment and my debts if we were to get divorce. I don't know where she came up with \$75K. The total down payment and my debt repayment was a total of \$65k plus the car of \$4000. This made me feel very weird and confused to why my new wife would send me such a letter. In my mind and heart I knew Lindsey was my wife and I wasn't going to divorce her. In my mind I took vows and I would fight through all our issues no matter what so I signed her demand to pay her back. After I signed the paperwork for the house, I took the wire instruction to her office and told her that we would be homeowners all we had to do was wire the 62k over the bank. I left the wire instructions with her and I went to work. She later texted me and said its done. She went on her own to the bank. If she didn't want the house, she shouldn't have wired the money. After Lindsey wired the money, Linda checked on us to see how we were doing. I told her we weren't doing good so she told me

R-52

that we could still change our mind and cancel but she wouldn't be able to save our earnest money. I made the decision to keep moving forward.

We are currently going through a divorce right now and I am moved out of the home we bought. Lindsey is making outrageous claims and slandering me and Linda on social media. She's telling people that Linda and I were working together to buy the house with her money without putting her on the deed, like we were out to scam her. I barely knew Linda when we were buying the house I was doing what my wife and I had planned together! Because of her posts, her followers were sending me death threats and harassing me. Lindsey has even gone as far as to delete all text messages from my phone during the time we were buying the house because she knows she is lying. She knows that her and I agreed to do this together. I don't understand her problem with the deed. We are married and that house is ours. Although I didn't put the down payment, I am the only person paying all the bills with the house. Linda explained to me that all we need to do is go to the title company and do a quit claim to add her to the deed. If we were to stay married, I would have no problem going to add her name to the deed but everything is now being handled through my attorney. Linda isn't the only person Lindsey has had an issue with. She's has had issues and complaints with her son's doctors, her family, make a Wish foundation, St Jude etc. She's even had an issue with a cancer family she was supposed to be helping. It's all on her facebook page. If you have any questions in regards to my letter please call me at 702-578-5372.

Bobby Antee

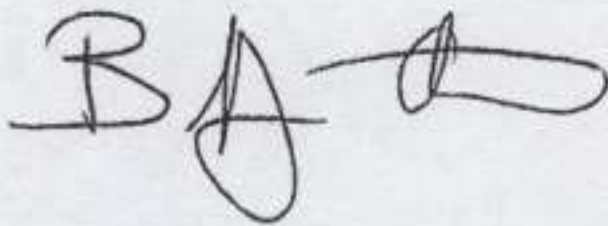
A handwritten signature in black ink, appearing to be 'BA' followed by a stylized flourish.

EXHIBIT 10

Linda Naw | ERA Brokers Consolidated

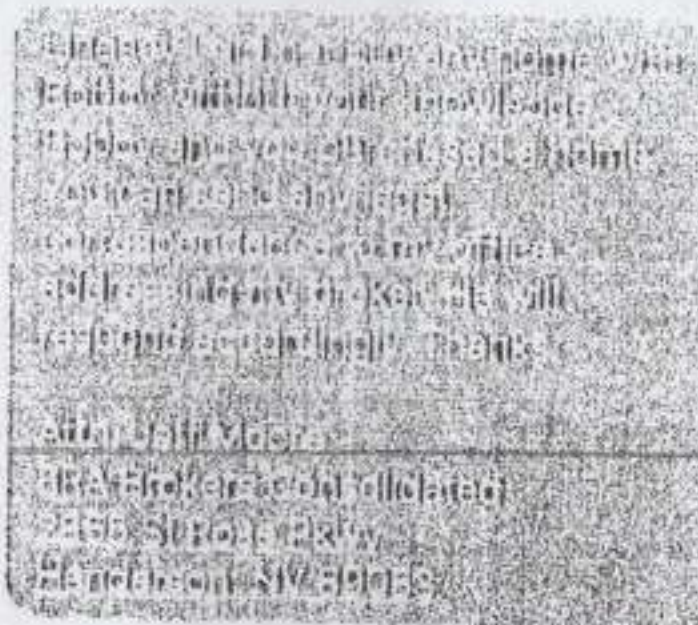
Evidence
Antee vs. Naw

R-54

Verizon 2:28 PM 74%
Lindsey

June 26, 2018

I see you and Bobby bought this house without me on the deed while we were married without my knowledge and with my money. I will be reporting you and filing a suit



I definitely will and no I have every message you sent and you will be



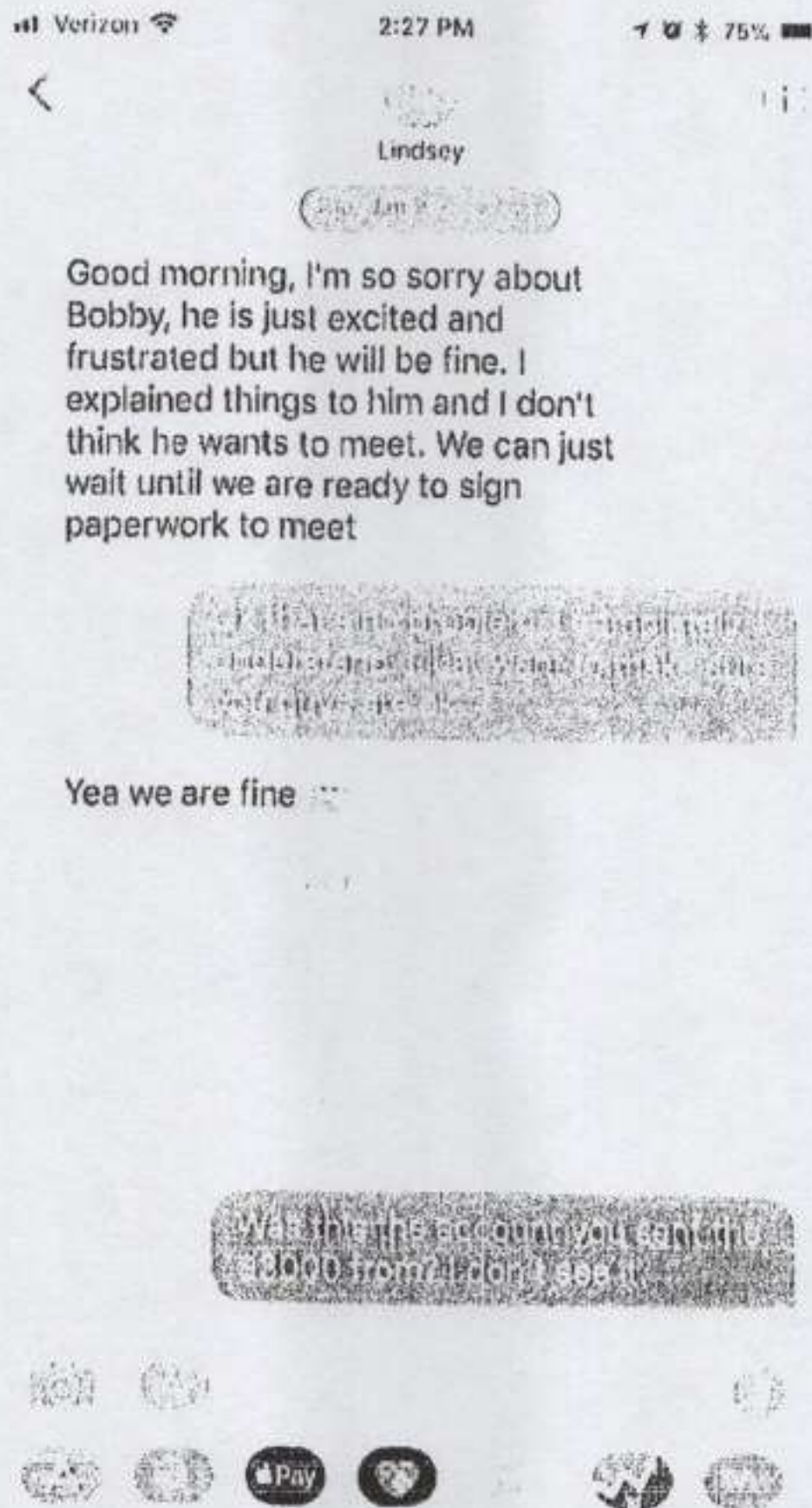
R-55

EXHIBIT 11

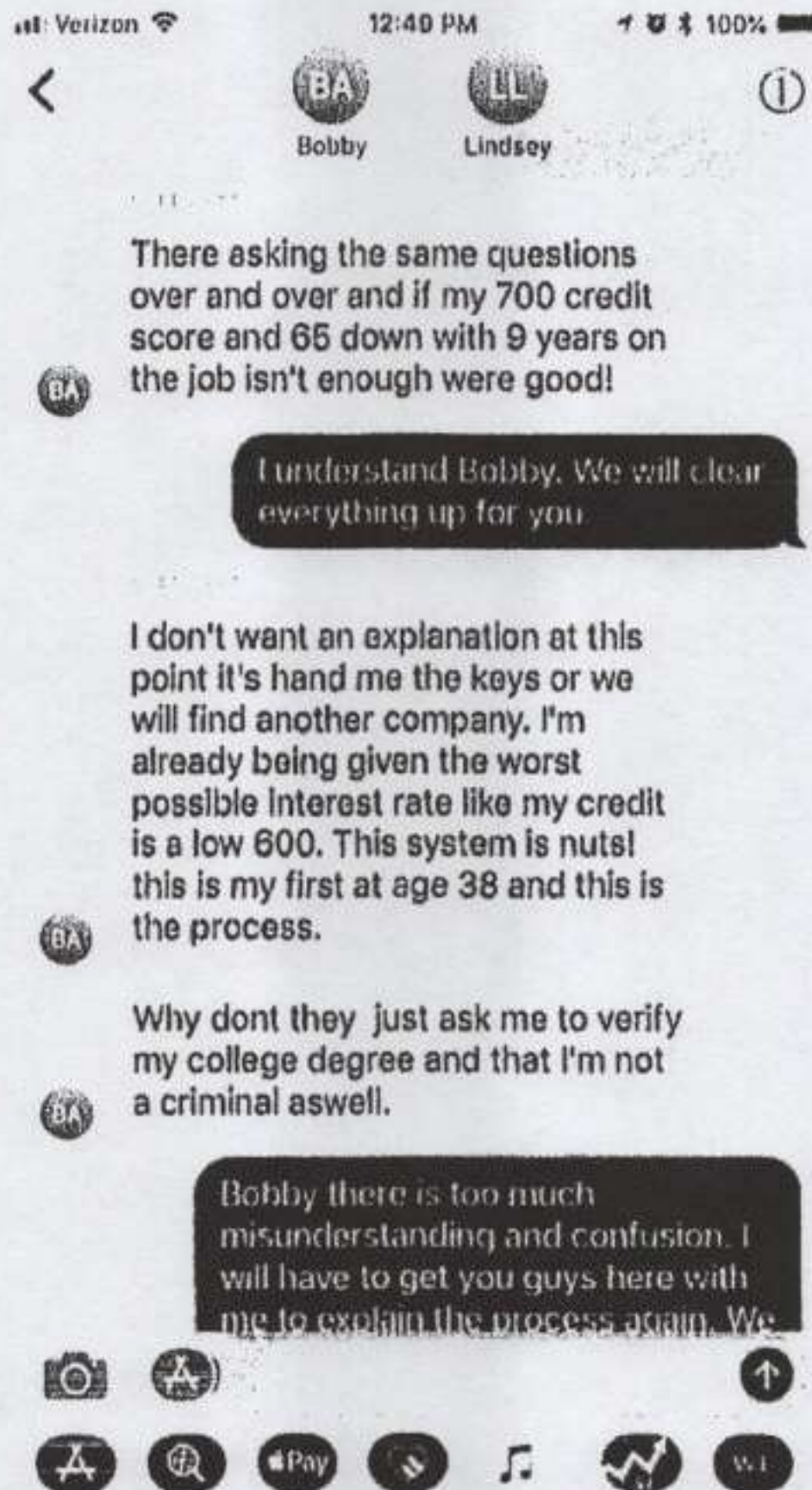
Linda Naw | ERA Brokers Consolidated

Evidence
Antee vs. Naw

R-56



R-57



R-58

