

IN THE SUPREME COURT OF THE STATE OF NEVADA

LINDSEY LICARI, an Individual,
Appellant,
vs.

NIKKI SIKALIS BOTT, an Individual; and
NATIONAL TITLE COMPANY, a Nevada
Corporation
Respondents.

Supreme Court No.81942

Electronically Filed
Oct 20 2020 05:00 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

RESPONDENTS' RESPONSE TO APPELLANT'S DOCKETING STATEMENT

Respondents file this instant Response to the Appellant's Docketing Statement and state the following:

8. Nature of Action: Lindsey Licari by and through her then counsel Jennings and Fulton filed a Complaint against National Title Co., and Nikki Sikalis Bott for the following causes of action: 1) Breach of Fiduciary Duty, 2) Fraud/Intentional Misrepresentation, 3) Constructive Fraud, 4) Negligence, 5) Negligent Hiring, 6) Retention and Supervision, 7) Violation of NRS 240.075, 8) Negligence Per Se, 9) Negligent Misrepresentation, 10) Unjust Enrichment. These claims arise out of Licari's claim that the defendants forged her signature on a Grant Bargain Sale Deed on a home that she currently lives in. Upon Judge Hughes issuing her Findings of Fact Conclusions of Law and Decree of Divorce in Licari's divorce after a two-day trial, Defendants moved for summary judgment on issue preclusion. Defendants prevailed and now the Plaintiff appeals.

9. Issues on Appeal: The issue on appeal solely relates to whether issue preclusion was appropriate.

10. Pending Proceedings in this Court: The other pending proceeding before this Court is the case called *Antee v. Antee* (Case No.81635), in which the issue is whether the court erred in the issuance of the Findings of Fact Conclusions of Law and Decree of Divorce. In the Findings of Fact Conclusions of Law and Decree of Divorce, Judge Hughes found among other things that Lindsey Licari executed the Grant Bargain Sale Deed that she claims was forged.

11. Constitutional issues: There are no constitutional issues related to this appeal.

13. Court of Appeals or Supreme Court: This matter presumptively falls under the Court of Appeals under NRAP 17(b)(5).

14. Judicial Disqualification: There is no known basis to seek disqualification of any Justice or Judge of the Court of Appeals.

23. Description of Claims and Disposition: Plaintiff filed a Complaint. Summary Judgment was entered against Plaintiff on her claims on October 13, 2020.

24. Adjudication of ALL claims: The Judgment was final and adjudicated all claims alleged in that action. Rule 54(b) certification is not necessary or appropriate.

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Dated this 20th day of October, 2020.

/s/ Angela Nakamura Ochoa
Angela Nakamura Ochoa, Esq. NV Bar No. 10164
9900 Covington Cross Dr., Suite 120
Las Vegas, NV 89144

*Attorney for Respondents Nikki Sikalis Bott and
National Title Co.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of October, 2020, I mailed the foregoing
RESPONDENTS' RESPONSE TO APPELLANT'S DOCKETING STATEMENT,
via U.S. First Class Mail, postage prepaid, addressed to:

Lindsey Licari, An Individual
9564 Scorpion Track Ct.
Las Vegas NV 89178
Lindseylicari14@aol.com
Appellant

/s/ Juan Cerezo
An employee of LIPSON NEILSON P.C.