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STATE BAR OF NEVADA

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March 30, 2020

CERTIFIED MAIL RETURN RECEIPT REQUESTED

State Bar of Nevada
Attn: Phillip Pattee, Esq.
3100 W. Charleston Blvd. #100
Las Vegas, Nevada 89102

Re: Grievance #OVG19-1545 Lindsey Antee Licari

Dear Mr. Patee:

This letter is in response to Lindsey Antee Licari's Fee dispute of March 10, 2020. In that regard, I have the following reply:

Lindsey retained my office for an uncontested divorce on or about July 12, 2018. A copy of my retainer agreement is attached hereto as Exhibit 1. Also attached is my contested retainer agreement which was given to Lindsey on the same date as her consultation. A copy of all of my Invoices are attached as Exhibit 2 which total \$3,443.00. A copy of her payments totaling \$3,500.00 is attached hereto as Exhibit "4".

Lindsey started the divorce in proper person. However, she failed to inform me or my staff that she had Bobby served nor did she file the appropriate Affidavit of Service. Please see the e-mail to my staff dated July 18, 2018, telling us where to serve Bobby and proving us with a photograph. The divorce was highly contested, which is why Lindsey paid additional funds, even though she failed to sign my contested retainer agreement.

Lindsey fired me and re-hired me. She refused to listen to my legal advice and during my representation in the middle of her contested divorce, she filed a Legal Separation in proper person on December 20, 2018. I was forced to file a Motion to Dismiss same as opposing counsel refused to stipulate to dismiss. A copy of that Register of Actions is attached as Exhibit 5. I also recall that at the same time Lindsey had a Civil matter also proceeding over funds which Bobby Antee took from her foundation. However, I was not involved in the civil case. So this matter was convoluted.

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OFFICE OF BAR COUNSEL

State Bar of Nevada
Phillip Patee, Esq.
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Lindsey was a difficult client to represent. She would call and yell at my paralegal, Kathy, then the next day sent us a thank you by having delivered chocolate covered strawberries from Edible Arrangements. Lindsey came in for an appointment and she brought her mother with her. My staff can testify that we had to air out our lobby because it reeked of marijuana. We had to use numerous sprays and turn on the ceiling fan and open the door so other clients would not be offended by the smell which permeated the entire office. The bottom line is Lindsey refused to listen to legal advice, so I was forced to file a motion to withdraw.

Lindsey was in a contested divorce but she refused to cooperate. We were gearing up for trial then she asked that I withdraw for the second time and I did so. As you can see from my invoices my billing is very conservative as I take pride in not over-charging any client.

Please note that this is our FOURTH Response to the State Bar regarding Lindsey. How many times should she be able to file Complaints against my office. At this point in time, I do not feel that this is fair and I ask that you take this into consideration. Should you wish to discuss this with me further, please do not hesitate to contact me. Thank you for your time and consideration.

Sincerely,



Christopher R. Tilman, Esq.

CRT/kg
Enclosures