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8 *Attorney for Linda Naw, Bobby Antee, and  
Shumway Van*

9 **EIGHTH JUDICIAL DISTRICT COURT**  
10 **CLARK COUNTY, NEVADA**

LINDSEY LICARI, an individual,

Case No.: A-20-820980-C

Plaintiff,

Dept. No.: XXXII

v.

11  
12 NIKKI SIKALIS BOTT, an individual;  
13 NATIONAL TITLE CO., a Nevada  
14 Corporation; LINDA NAW, an individual;  
15 ERA BROKERS, a Nevada Corporation;  
16 VALLEY WEST MORTGAGE, a Nevada  
17 Corporation; DREW LEVY, an individual;  
18 BOBBY ANTEE, an individual; ONE  
19 REALTY GROUP, a Nevada Corporation;  
20 MELISSA PARKER, an individual;  
21 MELANIE TREANOR, an individual;  
22 GREATER LAS VEGAS ASSOCIATION OF  
23 REALTORS; a Nevada corporation;  
24 NEVADA REAL ESTATE DIVISION  
25 BUSINESS AND INDUSTRY; a Nevada  
26 Corporation; LINDA STRATTON, an  
27 individual; INGRID TRUJILLO, an  
28 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,

**DEFENDANT SHUMWAY VAN'S**  
**JOINDER TO MOTIONS TO DECLARE**  
**LINDSEY LICARI A VEXATIOUS**  
**LITIGANT AND DISMISS THE**  
**COMPLAINT, OR IN THE**  
**ALTERNATIVE MOTION TO STAY,**  
**AND OBJECTIONS TO PLAINTIFF'S**  
**COMPLAINTS**

Defendants.

1 **DEFENDANT SHUMWAY VAN’S JOINDER TO MOTIONS TO DECLARE LINDSEY**  
2 **LICARI A VEXATIOUS LITIGANT AND DISMISS THE COMPLAINT, OR IN THE**  
3 **ALTERNATIVE MOTION TO STAY, AND OBJECTION TO PLAINTIFF’S**  
4 **COMPLAINTS**

5 Defendant SHUMWAY VAN (“SV”) by and through their attorneys of record, Garrett R.  
6 Chase, Esq. of the law firm of Shumway Van, hereby joins Linda Naw and Bobby Antee’s Motions  
7 to Declare Lindsey Licari (“Plaintiff”) a Vexatious Litigant and Dismiss the Complaint, or in the  
8 Alternative Motion to Stay (the “Motions”) in their entirety and files this objection to Plaintiff’s  
9 Complaints in this matter. In particular, SV hereby incorporates by reference the arguments and  
10 law cited in the Motions as if set forth fully herein. As they pertain to SV, Plaintiff has lodged or  
11 attempted to lodge virtually identical claims against Shumway Van in two separate proceedings  
12 including Case No. A-20-820446-C and Case No. A-20-820963-C, and has referenced the same  
13 baseless allegations in virtually all of the cases described in the Motions. Accordingly, SV  
14 explicitly joins in the request that Plaintiff be declared a vexatious litigant with regard to SV and  
15 that her Complaints in the instant case be dismissed. In the alternative, SV requests that Plaintiff’s  
16 claims against SV be stayed pending determinations in the above-referenced cases.

17 SV additionally objects to the numerous Complaints filed in this matter. More specifically,  
18 Plaintiff has filed three similar yet distinct complaints in this case. The first was filed on September  
19 10, 2020. Subsequently, and without leave of the Court, Plaintiff filed two additional Complaints,  
20 one identified as “Amended COMPLAINT” in the filing, which was filed on September 23, 2020  
21 and the second which was filed later on September 23, 2020, which is characterized as Complaint  
22 Exempt from Arbitration (Amount in Controversy is Over \$50,000) (Amended). SV first objects  
23 to the third Complaint as procedurally improper. NRCP 15 allows for amendment “once as a  
24 matter of course.” NRCP 15(a)(1). After that, a party may amend its pleading only with the  
25 opposing party’s written consent or the court’s leave.” NRCP 15(a)(2). Here, Plaintiff undisputedly  
26 filed a third Complaint without leave of the Court or consent of the parties. As such, SV also  
27 objects to the service of these Complaints upon SV as it is unclear which Complaint was  
28 purportedly served upon SV and whether or not that Complaint is void ab initio based on Plaintiff’s

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failure to comply with NRCP 15. Accordingly, Plaintiff states these objections for the record and reserves the right to make additional argument regarding these objections at the time of hearing, if any, in this matter.

DATED this 17th day of November, 2020.

**SHUMWAY VAN**

By: /s/ Garrett R. Chase  
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**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to NRCP 5(b), on the 17th day of November 2020, I served a true and correct copy of the foregoing **DEFENDANT SHUMWAY VAN'S JOINDER TO MOTIONS TO DECLARE LINDSEY LICARI A VEXATIOUS LITIGANT AND DISMISS THE COMPLAINT, OR IN THE ALTERNATIVE MOTION TO STAY, AND OBJECTION TO PLAINTIFF'S COMPLAINTS** to all parties listed on the master service list in accordance with the Electronic Service and Filing Order created in this matter.

*/s/ Marina Scott*  
An Employee of Shumway Van

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