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CLERK OF THE COURT

Marquis Aurbach Coffing
Micah S. Echols, Esq.
Nevada Bar No. 8437
Liane K. Wakayama, Esq.
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Las Vegas, Nevada 89145
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mechols@maclaw.com
lwakayama@maclaw.com
Attorneys for Plaintiff, G2 Ventures, LLC

Electronically Filed
Apr 19 2016 09:29 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

DISTRICT COURT

CLARK COUNTY, NEVADA

G2 VENTURES LLC, a Nevada Limited Liability Company,

Plaintiff,

vs.

TWINROCK PARTNERS, LLC, a California Limited Liability Company; DOES I-X, and ROES I-X, inclusive,

Defendant.

Case No.: A-15-720835-C
Dept. No.: XXXI

NOTICE OF APPEAL

MARQUIS AURBACH COFFING
10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

MAC:14304-001 2769671_1

Docket 70176 Document 2016-12104

NOTICE OF APPEAL

Plaintiff, G2 Ventures, LLC, by and through its attorneys of record, the law firm of Marquis Aurbach Coffing, hereby appeals to the Supreme Court of Nevada from: (1) the Findings of Fact, Conclusions of Law and Order Denying Plaintiff G2 Ventures, LLC's Motions for Rehearing and Reconsideration of Order Granting Summary Judgment, which was filed on March 16, 2016 and noticed on March 18, 2016; and (2) the Findings of Fact, Conclusions of Law and Order Granting Defendant Twinrock Partners, LLC's Motion for Summary Judgment, which was filed on December 2, 2015 and noticed on December 3, 2015.

Dated this 13th day of April, 2016.

MARQUIS AURBACH COFFING

By /s/ Micah S. Echols
Micah S. Echols, Esq.
Nevada Bar No. 8437
Liane K. Wakayama, Esq.
Nevada Bar No. 11313
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Plaintiff, G2 Ventures, LLC

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CERTIFICATE OF SERVICE

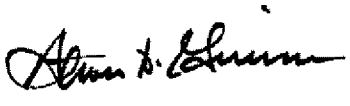
I hereby certify that the foregoing **NOTICE OF APPEAL** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 13th day of April, 2016. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:[1]

Cella Lange & Cella LLP	
Contact	**Email**
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Christopher L. Cella	clcella@cellalange.net
James D. Luhmann	jdluhmann@cellalange.net
Rocco Lange	rocco@cellalange.net
The Wright Law Group, P.C.	
Contact	**Email**
Dayana	dayana@wrightlawgroupnv.com

/s/ Leah Dell
Leah Dell, an employee of
Marquis Aurbach Coffing

[1] Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

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CLERK OF THE COURT

Marquis Aurbach Coffing
Micah S. Echols, Esq.
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mechols@maclaw.com
lwakayama@maclaw.com
Attorneys for Plaintiff, G2 Ventures, LLC

DISTRICT COURT

CLARK COUNTY, NEVADA

G2 VENTURES LLC, a Nevada Limited Liability Company, Plaintiff, vs. TWINROCK PARTNERS, LLC, a California Limited Liability Company; DOES I-X, and ROES I-X, inclusive, Defendant.	Case No.: A-15-720835-C Dept. No.: XXXI

CASE APPEAL STATEMENT

Plaintiff, G2 Ventures, LLC (hereinafter "Plaintiff"), by and through its attorneys of record, the law firm of Marquis Aurbach Coffing, hereby files this Case Appeal Statement.

1. Name of appellant filing this Case Appeal Statement:

   Appellant: G2 Ventures, LLC

2. Identify the Judge issuing the decision, judgment, or order appealed from:

   The Honorable Joanna S. Kishner

3. Identify each appellant and the name and address of counsel for each appellant:

   Appellant: G2 Ventures, LLC
   Counsel for Appellant:
   Micah S. Echols, Esq.
   Liane K. Wakayama, Esq.
   Marquis Aurbach Coffing
   10001 Park Run Drive
   Las Vegas, Nevada 89145

MARQUIS AURBACH COFFING
10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

4. Identify each respondent and the name and address of appellate counsel, if known, for each respondent (if the name of a respondent's appellate counsel is unknown, indicated as much and provide the name and address of that respondent's trial counsel):

Respondent: TwinRock Partners, LLC
Counsel for Respondent:
John Henry Wright, Esq.
The Wright Law Group
2340 Paseo Del Prado, Suite D-305
Las Vegas, Nevada 89102

5. Indicate whether any attorney identified above in response to question 3 or 4 is not licensed to practice law in Nevada and, if so, whether the district court granted that attorney permission to appear under SCR 42 (attach a copy of any district court order granting such permission):

Not Applicable.

6. Indicated whether appellant was represented by appointed or retained counsel in the district court:

Appellant, G2 Ventures, LLC, is represented by retained counsel, the law firm of Marquis Aurbach Coffing.

7. Indicate whether appellant is represented by appointed or retained counsel on appeal:

Appellant, G2 Ventures, LLC, is represented by retained counsel, the law firm of Marquis Aurbach Coffing.

8. Indicate whether appellant was granted leave to proceed in forma pauperis, and the date of entry of the district court order granting such leave:

Not Applicable.

9. Indicate the date the proceedings commenced in the district court (e.g., date complaint indictment, information, or petition was filed):

The proceeding commenced in the District Court on July 2, 2015 from the complaint filed by Plaintiff, G2 Ventures, LLC.

MARQUIS AURBACH COFFING
10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

10. Provide a brief description of the nature of the action and result in the district court, including the type of judgment or order being appealed and the relief granted by the district court:

> The underlying facts of the case deal with a business venture between G2 and TwinRock to acquire HOA foreclosure properties. After the properties were acquired under a contract using G2's strategy, TwinRock acquired more properties in which they deny G2 has any interest. G2 filed this action against TwinRock alleging claims for: (1) breach of joint venture agreement; (2) preliminary and permanent injunction; (3) breach of fiduciary duty; (4) breach of contract implied in fact; (5) misappropriation of trade secrets; (6) breach of confidence; (7) conversion; (8) restitution; and (9) accounting.
>
> Prior to discovery, the District Court granted summary judgment to TwinRock. Upon G2's motion for reconsideration, the District Court considered the arguments on the merits but denied reconsideration. G2 now appeals from these orders.

11. Indicate whether the case has previously been the subject of an appeal to or original writ proceeding in the Supreme Court and, if so, the caption and Supreme Court docket number of the prior proceeding:

> Not Applicable.

12. Indicate whether this appeal involves child custody or visitation:

> Not Applicable.

13. If this is a civil case, indicate whether this appeal involves the possibility of settlement:

> Settlement is not likely until the disputed issues of law are resolved on appeal. Plaintiff asks the Supreme Court to exempt this case from the NRAP 16 settlement conference program.

Dated this 13th day of April, 2016.

MARQUIS AURBACH COFFING

By /s/ Micah S. Echols
Micah S. Echols, Esq.
Nevada Bar No. 8437
Liane K. Wakayama, Esq.
Nevada Bar No. 11313
10001 Park Run Drive
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **CASE APPEAL STATEMENT** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 13th day of April, 2016. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:[1]

Cella Lange & Cella LLP	
Contact	**Email**
Brian L. Cella	blcella@cellalange.net
Christopher L. Cella	clcella@cellalange.net
James D. Luhmann	jdluhmann@cellalange.net
Rocco Lange	rocco@cellalange.net
The Wright Law Group, P.C.	
Contact	**Email**
Dayana	dayana@wrightlawgroupnv.com

/s/ Leah Dell
Leah Dell, an employee of
Marquis Aurbach Coffing

[1] Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

DEPARTMENT 31

CASE SUMMARY

CASE NO. A-15-720835-C

G2 Ventures LLC, Plaintiff(s)	§	Location:	**Department 31**
vs.	§	Judicial Officer:	**Kishner, Joanna S.**
TwinRock Partners LLC, Defendant(s)	§	Filed on:	**07/02/2015**
	§	Cross-Reference Case Number:	**A720835**
	§		

CASE INFORMATION

Statistical Closures
12/02/2015 Summary Judgment

Case Type: **Other Contract**

Case Flags: **In Arbitration Program**
Appealed to Supreme Court

DATE — CASE ASSIGNMENT

Current Case Assignment

Case Number	A-15-720835-C
Court	Department 31
Date Assigned	07/02/2015
Judicial Officer	Kishner, Joanna S.

PARTY INFORMATION

		Lead Attorneys
Plaintiff	**G2 Ventures LLC**	**Wakayama, Liane K.** *Retained* 702-382-0711(W)
Defendant	**TwinRock Partners LLC**	**Wright, John H.** *Retained* 702-405-0001(W)

DATE	EVENTS & ORDERS OF THE COURT	INDEX
07/02/2015	Complaint Filed By: Plaintiff G2 Ventures LLC *Verified Complaint*	
07/03/2015	Initial Appearance Fee Disclosure Filed By: Plaintiff G2 Ventures LLC *Initial Appearance Fee Disclosure*	
07/30/2015	Affidavit of Service Filed By: Plaintiff G2 Ventures LLC *Affidavit of Service*	
08/03/2015	Motion to Associate Counsel Filed By: Plaintiff G2 Ventures LLC *Motion to Associate Counsel*	
08/03/2015	Motion to Associate Counsel Filed By: Plaintiff G2 Ventures LLC *Motion to Associate Counsel*	
08/03/2015	Motion to Associate Counsel Filed By: Plaintiff G2 Ventures LLC *Motion to Associate Counsel*	

08/04/2015	Answer Filed By: Defendant TwinRock Partners LLC *Answer*
08/04/2015	Initial Appearance Fee Disclosure Filed By: Defendant TwinRock Partners LLC *Initial Appearance Fee Disclosure*
08/18/2015	Notice of Early Case Conference Filed By: Plaintiff G2 Ventures LLC *Notice of Early Case Conference*
09/04/2015	**Motion to Associate Counsel** (3:00 AM) (Judicial Officer: Kishner, Joanna S.) *Plaintiff's Motion to Associate Counsel (Brian Louis Cella, Esq)*
09/04/2015	**Motion to Associate Counsel** (3:00 AM) (Judicial Officer: Kishner, Joanna S.) *Plaintiff's Motion to Associate Counsel (Christopher Lawrence Cella, Esq)*
09/04/2015	**Motion to Associate Counsel** (3:00 AM) (Judicial Officer: Kishner, Joanna S.) *Plaintiff's Motion to Associate Counsel (James Dennis Luhmann, Esq)*
09/08/2015	Amended Notice Filed By: Plaintiff G2 Ventures LLC *Amended Notice of Early Case Conference*
09/10/2015	Order Admitting to Practice Filed By: Plaintiff G2 Ventures LLC *Order Admitting to Practice - Christopher L Cella*
09/10/2015	Order Admitting to Practice Filed By: Plaintiff G2 Ventures LLC *Order Admitting to Practice - James D Luhmann*
09/10/2015	Order Admitting to Practice Filed By: Plaintiff G2 Ventures LLC *Order Admitting to Practice - Brian L Cella*
09/11/2015	Motion for Summary Judgment Filed By: Defendant TwinRock Partners LLC *Defendant Twinrock Partners, LLC's Motion for Summary Judgment*
09/15/2015	Notice of Entry of Order Filed By: Plaintiff G2 Ventures LLC *Notice of Entry of Order - Christopher Cella*
09/15/2015	Notice of Entry of Order Filed By: Plaintiff G2 Ventures LLC *Notice of Entry of Order - James Luhmann*
09/15/2015	Notice of Entry of Order Filed By: Plaintiff G2 Ventures LLC *Notice of Entry of Order - Brian Cella*
09/28/2015	

	Opposition Filed By: Plaintiff G2 Ventures LLC *Plaintiff G2 Venture's Opposition to Motion for Summary Judgment*
09/28/2015	Declaration Filed By: Plaintiff G2 Ventures LLC *Declaration of Richard Simmons in Support of G2 Venture's Opposition to Motion for Summary Judgment*
09/29/2015	Errata Filed By: Plaintiff G2 Ventures LLC *Errata and Supplement to Plaintiff G2 Venture's Opposition to Motion for Summary Judgment*
10/06/2015	Reply to Motion Filed By: Defendant TwinRock Partners LLC *Defendant Twinrock Partners, LLC's Reply to G2 Ventures, LLC's Opposition to Motion for Summary Judgment*
10/13/2015	**Motion for Summary Judgment** (9:30 AM) (Judicial Officer: Kishner, Joanna S.) *Defendant Twinrock Partners, LLC's Motion for Summary Judgment*
10/23/2015	Recorders Transcript of Hearing *Transcript of Proceedings: Defendant TwinRock Partners, LLC's Motion for Summary Judgment -- 10-13-15*
10/29/2015	**Status Check** (3:00 AM) (Judicial Officer: Kishner, Joanna S.) *Status Check: Order 10/13/15*
12/02/2015	Findings of Fact, Conclusions of Law and Order Filed By: Defendant TwinRock Partners LLC *Findings of Fact, Conclusions of Law and Order Granting Defendant Twinrock Partners, LLC's Motion for Summary Judgment*
12/02/2015	**Summary Judgment** (Judicial Officer: Kishner, Joanna S.) Debtors: G2 Ventures LLC (Plaintiff) Creditors: TwinRock Partners LLC (Defendant) Judgment: 12/02/2015, Docketed: 12/10/2015
12/03/2015	Notice of Entry of Order Filed By: Defendant TwinRock Partners LLC *Notice of Entry of Order*
12/21/2015	Notice of Appearance Party: Plaintiff G2 Ventures LLC *Notice of Appearance*
12/21/2015	Motion to Reconsider Filed By: Plaintiff G2 Ventures LLC *Plaintiff G2 Venture's Motions for Rehearing and Reconsideration of Order Granting Summary Judgment*
01/05/2016	Substitution of Attorney Filed by: Plaintiff G2 Ventures LLC *Substitution of Attorney*

01/08/2016	Opposition to Motion Filed By: Defendant TwinRock Partners LLC *Defendant Twinrock Partners, LLC's Opposition to G2 Ventures, LLC's Motion for Rehearing and Reconsideration of Order for Summary Judgments*
01/14/2016	Motion Filed By: Plaintiff G2 Ventures LLC *Plaintiff's Motion to Exceed Page Limit of Reply in Support of Plaintiff's Motions for Rehearing and Reconsideration of Order Granting Summary Judgment*
01/15/2016	Reply in Support Filed By: Plaintiff G2 Ventures LLC *Reply in Support of Plaintiff G2 Ventures, LLC's Motions for Rehearing and Reconsideration of Order Granting Summary Judgment*
01/20/2016	Order Filed By: Plaintiff G2 Ventures LLC *Order Granting Motion to Exceed Page Limit*
01/21/2016	Notice of Entry of Order Filed By: Plaintiff G2 Ventures LLC *Notice of Entry of Order*
01/21/2016	Notice of Hearing Filed By: Plaintiff G2 Ventures LLC *Notice of Hearing*
01/26/2016	**Motion to Reconsider** (10:00 AM) (Judicial Officer: Kishner, Joanna S.) *Plaintiff G2 Venture's Motions for Rehearing and Reconsideration of Order Granting Summary Judgment*
02/02/2016	Transcript of Proceedings *Transcript Re: Plaintiff G2 Venture's Motions for Rehearing and Reconsideration of Order Granting Summary Judgment 1-26-16*
02/12/2016	**Status Check** (3:00 AM) (Judicial Officer: Kishner, Joanna S.) *Status Check: Order 1/26/16*
03/16/2016	Notice Filed By: Plaintiff G2 Ventures LLC *Notice of Rejected Order*
03/16/2016	Findings of Fact, Conclusions of Law and Order Filed By: Defendant TwinRock Partners LLC *Findings of Fact, Conclusion of Law and Order Denying Plaintiff G2 Ventures, LLC's Motions for Rehearing and Reconsideration of Order Granting Summary Judgment*
03/18/2016	Notice of Entry of Order Filed By: Defendant TwinRock Partners LLC *Notice of Entry of Order*
03/22/2016	Arbitration File *Arbitration File*
04/13/2016	

	Notice of Appeal Filed By: Plaintiff G2 Ventures LLC *Notice of Appeal*	
04/13/2016	Case Appeal Statement Filed By: Plaintiff G2 Ventures LLC *Case Appeal Statement*	

DATE	FINANCIAL INFORMATION	
	Defendant TwinRock Partners LLC	
	Total Charges	423.00
	Total Payments and Credits	423.00
	Balance Due as of 4/15/2016	**0.00**
	Plaintiff G2 Ventures LLC	
	Total Charges	325.50
	Total Payments and Credits	325.50
	Balance Due as of 4/15/2016	**0.00**
	Plaintiff G2 Ventures LLC	
	Appeal Bond Balance as of 4/15/2016	**500.00**

DISTRICT COURT CIVIL COVER SHEET

County, Nevada

Case No. A-15-720835-C
(Assigned by Clerk's Office) XXXI

I. Party Information *(provide both home and mailing addresses if different)*

Plaintiff(s) (name/address/phone):	Defendant(s) (name/address/phone):
G2 Ventures LLC	Twinrock Partners, LLC
Attorney (name/address/phone):	Attorney (name/address/phone):
Zachary T. Ball, Esq.	
The Ball Law Group	
3455 Cliff Shadows Parkway, Suite 150	
Las Vegas, Nevada 89129	

II. Nature of Controversy *(please select the one most applicable filing type below)*

Civil Case Filing Types

Real Property	Torts	
Landlord/Tenant	**Negligence**	**Other Torts**
☐ Unlawful Detainer	☐ Auto	☐ Product Liability
☐ Other Landlord/Tenant	☐ Premises Liability	☐ Intentional Misconduct
Title to Property	☐ Other Negligence	☐ Employment Tort
☐ Judicial Foreclosure	**Malpractice**	☐ Insurance Tort
☐ Other Title to Property	☐ Medical/Dental	☐ Other Tort
Other Real Property	☐ Legal	
☐ Condemnation/Eminent Domain	☐ Accounting	
☐ Other Real Property	☐ Other Malpractice	

Probate	Construction Defect & Contract	Judicial Review/Appeal
Probate *(select case type and estate value)*	**Construction Defect**	**Judicial Review**
☐ Summary Administration	☐ Chapter 40	☐ Foreclosure Mediation Case
☐ General Administration	☐ Other Construction Defect	☐ Petition to Seal Records
☐ Special Administration	**Contract Case**	☐ Mental Competency
☐ Set Aside	☐ Uniform Commercial Code	**Nevada State Agency Appeal**
☐ Trust/Conservatorship	☐ Building and Construction	☐ Department of Motor Vehicle
☐ Other Probate	☐ Insurance Carrier	☐ Worker's Compensation
Estate Value	☐ Commercial Instrument	☐ Other Nevada State Agency
☐ Over $200,000	☐ Collection of Accounts	**Appeal Other**
☐ Between $100,000 and $200,000	☐ Employment Contract	☐ Appeal from Lower Court
☐ Under $100,000 or Unknown	☒ Other Contract	☐ Other Judicial Review/Appeal
☐ Under $2,500		

Civil Writ		Other Civil Filing
Civil Writ		**Other Civil Filing**
☐ Writ of Habeas Corpus	☐ Writ of Prohibition	☐ Compromise of Minor's Claim
☐ Writ of Mandamus	☐ Other Civil Writ	☐ Foreign Judgment
☐ Writ of Quo Warrant		☐ Other Civil Matters

Business Court filings should be filed using the Business Court civil coversheet.

July 2, 2015
Date

Signature of initiating party or representative

See other side for family-related case filings.

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CLERK OF THE COURT

ORDD
JOHN HENRY WRIGHT
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THE WRIGHT LAW GROUP, P.C.
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Las Vegas, Nevada 89102
Telephone: (702) 405-0001
Facsimile: (702) 405-8454
Email: john@wrightlawgroupnv.com
Attorney for Defendant
TWINROCK PARTNERS, LLC

DISTRICT COURT

CLARK COUNTY, NEVADA

G2 VENTURES, LLC, a Nevada Limited Liability Company, Plaintiff, vs. TWINROCK PARTNERS, LLC, a California Limited Liability Company; DOES I-X, and ROES I-X, inclusive, Defendants.	CASE NO. A-15-720835-C DEPT. NO. XXXI

THE WRIGHT LAW GROUP P.C.
2340 Paseo Del Prado, Suite D-305
Las Vegas, Nevada 89102
Tel: (702) 405-0001 Fax: (702) 405-8454

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER DENYING PLAINTIFF G2 VENTURES, LLC'S MOTIONS FOR REHEARING AND RECONSIDERATION OF ORDER GRANTING SUMMARY JUDGMENT

This matter having come on for hearing on January 26, 2016 and JOHN HENRY WRIGHT, ESQ. appearing on behalf of Defendant TWINROCK PARTNERS, LLC and LIANE K. WAKAYAMA, ESQ. and ADELE V. KAROUM, ESQ. appearing on behalf of Plaintiff G2 VENTURES, LLC, the Court having reviewed the pleadings and papers on file herein regarding Defendant TWINROCK PARTNERS, LLC'S Motions for Rehearing and Reconsideration of this Court's Order Granting Summary Judgment filed on December 2, 2015, hearing the arguments of counsel and reviewing the exhibits provided and good cause appearing therefore, the Court makes the following Findings of Fact, Conclusions of Law and Order:

FINDINGS OF FACT

1. Defendant TWINROCK PARTNERS, LLC filed Motion for Summary Judgment

02-16-16 A03:38 IN

THE WRIGHT LAW GROUP P.C.
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Las Vegas, Nevada 89102
Tel: (702) 405-0001 Fax: (702) 405-8454

expressly states that it is as to all causes of action and the Court identified and referred to that representation in deciding the Motion for Summary Judgment on all nine causes of action in Plaintiff's Verified Complaint filed on July 2, 2015 for: (1) Breach of Joint Venture Agreement; (2) Preliminary and Permanent Injunction, (3) Breach of Fiduciary Duty; (4) Breach of Contract Implied in Fact; (5) Misappropriation of Trade Secrets; (6) Breach of Confidence; (7) Conversion; (8) Restitution; and (9) Accounting.

2. The Court specifically asked whether Plaintiff was asking for NRCP 56(f) relief at the hearing on the Motion for Summary Judgment and the response was negative.

3. None of the exhibits attached to Plaintiff's Reply in Support of its Motions for Rehearing and Reconsideration are newly discovered evidence. They are old evidence either previously provided to the Court albeit with a new spin on them or not produced in the earlier hearing but could have been as they were in Plaintiff's possession in 2013 and could have been provided at the hearing in 2015 but were not.

4. Plaintiff has not identified any new law or change in law.

5. Plaintiff did not in its Motion or Reply set forth the particularity and/or grounds required for a NRCP 59(e) motion and filed the Motions under NRCP 62(e).

6. Defendant objected to the use of exhibits in the Reply submitted by Plaintiff which included exhibits and arguments not set forth in the Motions.

7. Plaintiff produced no evidence or law that this Court Order Granting Summary Judgment was clearly erroneous.

CONCLUSIONS OF LAW

1. Plaintiff failed to alleged with particularity some grounds under NRCP 62(e) or NRCP 59(e) upon which the Court can rely to reverse the Order Granting Summary Judgment pursuant to *AA Primo Builders v. Washington*, 245 P.3d 1190 (Nev. 2010).

2. There was no misunderstanding of the parties that Defendant's Motion for

Summary Judgment was as to all causes of action in Plaintiff's Verified Complaint.

3. Plaintiff failed to provide any newly discovered facts or law upon which the Court can rely to reverse the Order Granting Summary Judgment under EDCR 2.24.

4. For the purpose of a motion for reconsideration, this Court should not consider the arguments raised for the first time in Plaintiff's reply.

5. This Court, looking at the totality of the briefing including the arguments and exhibits attached to Plaintiff's Reply "whether or not I should or shouldn't have under defendant's objection, but just to try and evaluate it, giving everything full breadth and considering everything in the reply, I still would affirm the decision that summary judgment was appropriately granted as to all causes of action on what was presented to the Court from both a legal and appropriate manner."

6. The Order granting Summary Judgment was as to all claims in Plaintiff's Verified Complaint of July 2, 2015, Plaintiff did not request additional discovery although the issue was raised by the Court, and that the granting of Summary Judgment in favor of Defendant TWINROCK PARTNERS, LLC as to all causes of action was and remains appropriate.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Plaintiff G2 VENTURES, LLC's Motions for Rehearing and Reconsideration of Order Granting Summary Judgment is denied.

DATED this 11 day of ~~February~~ March, 2016.

JOANNA S. KISHNER

HONORABLE JOANNA S. KISHNER

Respectfully submitted by:

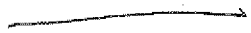
THE WRIGHT LAW GROUP, P.C.

JOHN HENRY WRIGHT
Nevada Bar No. 6182
THE WRIGHT LAW GROUP, P.C.
2340 Paseo Del Prado, Suite D-305
Las Vegas, Nevada 89102
Attorney for Defendant

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Approved as to form/content

MARQUIS AURBACH & COFFING



LIANE K. WAKAYAMA, ESQ.
ADELE V. KAROUM, ESQ.
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Plaintiff

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CLERK OF THE COURT

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Telephone: (702) 405-0001
Facsimile: (702) 405-8454
Attorney for TWINROCK PARTNERS, LLC

DISTRICT COURT

CLARK COUNTY, NEVADA

G2 VENTURES, LLC, a Nevada Limited Liability Company, Plaintiff, vs. TWINROCK PARTNERS, LLC, a California Limited Liability Company; DOES I-X, and ROES I-X, inclusive, Defendants.	CASE NO. A-15-720835-C DEPT. NO. XXXI

NOTICE OF ENTRY OF ORDER

NOTICE IS HEREBY GIVEN that a Findings of Fact, Conclusion of Law and Order Denying Plaintiff G2 Ventures, LLC's Motions for Rehearing and Reconsideration of Order Granting Summary Judgment, was entered on March 16, 2016, a copy of which is hereto attached as Exhibit 1.

Dated this 18th day of March, 2016

JOHN HENRY WRIGHT, ESQ.
Nevada Bar No. 6182
THE WRIGHT LAW GROUP
2340 Paseo Del Prado, Suite D-305
Las Vegas, Nevada 89102
Telephone: (702) 405-0001
Facsimile: (702) 405-8454
Attorney for Defendant

THE WRIGHT LAW GROUP P.C.
2340 Paseo Del Prado, Suite D-305
Las Vegas, Nevada 89102
Tel: (702) 405-0001 Fax: (702) 405-8454

CERTIFICATE OF SERVICE

I hereby certify that the foregoing NOTICE OF ENTRY OF ORDER was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 10th **day of March, 2016.** Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:[1]

CELLA LANGE & CELLA LLP
Brian L. Cella, Esq. **Blcella@cellalange.com**

THE BALL LAW GROUP
Zachary T. Ball, Esq. Zball@balllawgroup.com

MARQUIS AURBACH COFFING
Cally Hatfield, Esq. Chatfield@maclaw.com

I further certify that I served a copy of this document by Electronic mail a true and correct copy, addressed to:

None.

an employee of THE WRIGHT LAW GROUP, P.C.

[1] Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

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EXHIBIT 1

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CLERK OF THE COURT

ORDD
JOHN HENRY WRIGHT
Nevada Bar No. 6182
THE WRIGHT LAW GROUP, P.C.
2340 Paseo Del Prado, Suite D-305
Las Vegas, Nevada 89102
Telephone: (702) 405-0001
Facsimile: (702) 405-8454
Email: john@wrightlawgroupnv.com
Attorney for Defendant
TWINROCK PARTNERS, LLC

DISTRICT COURT

CLARK COUNTY, NEVADA

G2 VENTURES, LLC, a Nevada Limited Liability Company, Plaintiff, vs. TWINROCK PARTNERS, LLC, a California Limited Liability Company; DOES I-X, and ROES I-X, inclusive, Defendants.	CASE NO. A-15-720835-C DEPT. NO. XXXI

THE WRIGHT LAW GROUP P.C.
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Las Vegas, Nevada 89102
Tel: (702) 405-0001 Fax: (702) 405-8454

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER DENYING PLAINTIFF G2 VENTURES, LLC'S MOTIONS FOR REHEARING AND RECONSIDERATION OF ORDER GRANTING SUMMARY JUDGMENT

This matter having come on for hearing on January 26, 2016 and JOHN HENRY WRIGHT, ESQ. appearing on behalf of Defendant TWINROCK PARTNERS, LLC and LIANE K. WAKAYAMA, ESQ. and ADELE V. KAROUM, ESQ. appearing on behalf of Plaintiff G2 VENTURES, LLC, the Court having reviewed the pleadings and papers on file herein regarding Defendant TWINROCK PARTNERS, LLC'S Motions for Rehearing and Reconsideration of this Court's Order Granting Summary Judgment filed on December 2, 2015, hearing the arguments of counsel and reviewing the exhibits provided and good cause appearing therefore, the Court makes the following Findings of Fact, Conclusions of Law and Order:

FINDINGS OF FACT

1. Defendant TWINROCK PARTNERS, LLC filed Motion for Summary Judgment

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expressly states that it is as to all causes of action and the Court identified and referred to that representation in deciding the Motion for Summary Judgment on all nine causes of action in Plaintiff's Verified Complaint filed on July 2, 2015 for: (1) Breach of Joint Venture Agreement; (2) Preliminary and Permanent Injunction, (3) Breach of Fiduciary Duty; (4) Breach of Contract Implied in Fact; (5) Misappropriation of Trade Secrets; (6) Breach of Confidence; (7) Conversion; (8) Restitution; and (9) Accounting.

2. The Court specifically asked whether Plaintiff was asking for NRCP 56(f) relief at the hearing on the Motion for Summary Judgment and the response was negative.

3. None of the exhibits attached to Plaintiff's Reply in Support of its Motions for Rehearing and Reconsideration are newly discovered evidence. They are old evidence either previously provided to the Court albeit with a new spin on them or not produced in the earlier hearing but could have been as they were in Plaintiff's possession in 2013 and could have been provided at the hearing in 2015 but were not.

4. Plaintiff has not identified any new law or change in law.

5. Plaintiff did not in its Motion or Reply set forth the particularity and/or grounds required for a NRCP 59(e) motion and filed the Motions under NRCP 62(e).

6. Defendant objected to the use of exhibits in the Reply submitted by Plaintiff which included exhibits and arguments not set forth in the Motions.

7. Plaintiff produced no evidence or law that this Court Order Granting Summary Judgment was clearly erroneous.

CONCLUSIONS OF LAW

1. Plaintiff failed to alleged with particularity some grounds under NRCP 62(e) or NRCP 59(e) upon which the Court can rely to reverse the Order Granting Summary Judgment pursuant to *AA Primo Builders v. Washington*, 245 P.3d 1190 (Nev. 2010).

2. There was no misunderstanding of the parties that Defendant's Motion for

Summary Judgment was as to all causes of action in Plaintiff's Verified Complaint.

3. Plaintiff failed to provide any newly discovered facts or law upon which the Court can rely to reverse the Order Granting Summary Judgment under EDCR 2.24.

4. For the purpose of a motion for reconsideration, this Court should not consider the arguments raised for the first time in Plaintiff's reply.

5. This Court, looking at the totality of the briefing including the arguments and exhibits attached to Plaintiff's Reply "whether or not I should or shouldn't have under defendant's objection, but just to try and evaluate it, giving everything full breadth and considering everything in the reply, I still would affirm the decision that summary judgment was appropriately granted as to all causes of action on what was presented to the Court from both a legal and appropriate manner."

6. The Order granting Summary Judgment was as to all claims in Plaintiff's Verified Complaint of July 2, 2015, Plaintiff did not request additional discovery although the issue was raised by the Court, and that the granting of Summary Judgment in favor of Defendant TWINROCK PARTNERS, LLC as to all causes of action was and remains appropriate.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Plaintiff G2 VENTURES, LLC's Motions for Rehearing and Reconsideration of Order Granting Summary Judgment is denied.

DATED this 11 day of ~~February~~ March, 2016.

JOANNA S. KISHNER

HONORABLE JOANNA S. KISHNER

Respectfully submitted by:

THE WRIGHT LAW GROUP, P.C.

JOHN HENRY WRIGHT
Nevada Bar No. 6182
THE WRIGHT LAW GROUP, P.C.
2340 Paseo Del Prado, Suite D-305
Las Vegas, Nevada 89102
Attorney for Defendant

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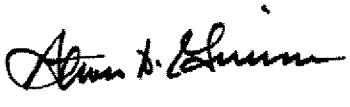
Approved as to form/content

MARQUIS AURBACH & COFFING

LIANE K. WAKAYAMA, ESQ.
ADELE V. KAROUM, ESQ.
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Plaintiff

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CLERK OF THE COURT

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Facsimile: (702) 405-8454
Email: john@wrightlawgroupnv.com
Attorney for Defendant
TWINROCK PARTNERS, LLC

DISTRICT COURT

CLARK COUNTY, NEVADA

G2 VENTURES, LLC, a Nevada Limited Liability Company, Plaintiff, vs. TWINROCK PARTNERS, LLC, a California Limited Liability Company; DOES I-X, and ROES I-X, inclusive, Defendants.	CASE NO. A-15-720835-C DEPT. NO. XXXI

THE WRIGHT LAW GROUP P.C.
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Las Vegas, Nevada 89102
Tel: (702) 405-0001 Fax: (702) 405-8454

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER GRANTING DEFENDANT TWINROCK PARTNERS, LLC'S MOTION FOR SUMMARY JUDGMENT

This matter having come on for hearing on October 13, 2015 and JOHN HENRY WRIGHT, ESQ. appearing on behalf of Defendant TWINROCK PARTNERS, LLC and ZACHARY T. BALL and CHRISTOPHER L. CELLA, ESQ. appearing on behalf of Plaintiff G2 VENTURES, LLC, the Court having reviewed the pleadings and papers on file herein regarding Defendant TWINROCK PARTNERS, LLC'S Motion for Summary Judgment, hearing the arguments of counsel and reviewing the exhibits provided and good cause appearing therefore, the Court makes the following Findings of Fact, Conclusions of Law and Order:

FINDINGS OF FACT

1. Plaintiff G2 VENTURES, LLC filed its' Verified Complaint on July 2, 2015 alleging nine causes of action for: (1) Breach of Joint Venture Agreement; (2)

☐ Voluntary Dismissal
☐ Involuntary Dismissal
☐ Stipulated Dismissal
☐ Motion to Dismiss by Deft(s)
☒ Summary Judgment
☐ Stipulated Judgment
☐ Default Judgment
☐ Judgment of Arbitration

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Preliminary and Permanent Injunction, (3) Breach of Fiduciary Duty; (4) Breach of Contract Implied in Fact; (5) Misappropriation of Trade Secrets; (6) Breach of Confidence; (7) Conversion; (8) Restitution; and (9) Accounting. All of these claims arise out of the allegation of the existence of a joint venture between Plaintiff G2 Ventures and Defendant Twinrock Partners.

2. Defendant TWINROCK PARTNERS, LLC filed an answer on August 4, 2015 and, subsequently, a Motion for Summary Judgment on or about September 11, 2015.

3. Plaintiff filed an Opposition to the Motion for Summary Judgment attaching a Declaration which is a restatement of paragraphs 9-35 of the Verified Complaint.

4. Plaintiff did not request additional discovery pursuant to NRCP 56(f).

5. Plaintiff's sole evidence is a document entitled "G2 Ventures LLC Confidential Information Memorandum" which is a 4 page document referring to a an Advisory Opinion of the Nevada Real Estate Division from December 12, 2012, a News Article from December 9, 2012 and a portion of a publication from ForeclosureRadar from January 6, 2013.

6. The Confidential Information Memorandum specifically requires that "any agreement with G2 Ventures and/or its principals requires a written agreement". (page 2 at footnote 1).

7. A Management and Services Agreement was ~~executed on~~ dated April 15, 2013 between two different parties, Summit Real Estate Group, Inc. and Underwood Partners, LLC, neither of whom is party to the instant litigation. (See Exhibit "A")

8. Plaintiff refers to this Agreement as evidence of the employment of the Confidential Information Memorandum in furtherance of the joint venture. Verified Complaint at paragraph 26.

9. The Management and Services Agreement contains an "entire agreement" provision [6b] which states:

> This Agreement contains the entire and complete understanding between the parties concerning its subject matter and all representations; agreements; arrangments and understandings between or among the parties, whether oral or

written, have been fully merged herein and are superseded hereby.

10. Plaintiff claims the implied joint venture was intended to be in *pari passu* which means proportionally. Verified Complaint at paragraph 3. Plaintiff ~~claims~~ alleges this entitles it to 50% of any profit realized by Defendant for any of the properties it purchased since the sharing of the Confidential Information Memorandum but does not admit any liability for losses. The Confidential Information Memorandum contains no provision for any sharing of profits or losses from its use. The Management and Services Agreement provides for a sharing of net profits at a rate of 90% to the investor-10% (after an 8% return and return of equity to the party providing the funds for the purchase of properties) to the party providing the knowledge. [provision 4]

11. Underwood Partners (which Plaintiff contends is the vehicle through which Defendant TWINROCK PARTNERS acted) has contributed over $1,000,000 for the purchase, repair, and maintenance of approximately 40 properties and Plaintiff G2 Ventures has contributed $0.00. Plaintiff has provided no evidence that it has contributed any monies for the purchase, repair and maintenance of the alleged 30-60 additional properties purchased by Defendant TWINROCK PARTNERS.

12. Plaintiff has shown no evidence that it had any voice in the control of the purchase of properties ~~in any way, shape or form~~. Instead, counsel stated that it "heard on the street" properties were

13. Plaintiff produced no evidence of the existence of a joint venture between itself and Defendant TWINROCK PARTNERS.

14. ~~Plaintiff produced no evidence that the~~ Based on what was presented to the Court, the Court cannot determine that the Confidential Information Memorandum contains any trade secrets.

CONCLUSIONS OF LAW

1. In order to show the existence of a joint venture, Plaintiff must establish (1) the existence of an express or implied agreement; (2) a common purpose that the group intends to carry out; (3) the rights of the parties to share profits and losses; and (4) the existence of an equal voice in controlling the project. *Bank of California v.*

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Connolly, 36 Cal. App. 3d 350, 364-365; 111 Cal. Rptr. 468, 477-478 (1973). *Black's Law Dictionary*, 9th Ed. p. 915 (2009). Plaintiff has failed to show any of these elements exist.

2. There is no express or implied agreement between Plaintiff and Defendant.

3. There is no course of dealing indicating the existence of a joint venture.

4. The Confidential Information Memorandum contains no evidence of any agreement as to the sharing of profits, losses or control.

5. Underwood Partners' (which Plaintiff contends is the vehicle through which Defendant TWINROCK PARTNERS acted) complete funding of the purchase price, repair and maintenance costs of all properties as well as responsibility to the various home owners associations is contrary to the existence of a joint venture.

6. Plaintiff failed to provide any evidence of any control or voice in the control of the alleged joint venture.

7. The Management and Services Agreement to which Plaintiff refers as the establishment of the joint venture clearly denies the existence of a joint venture and contains terms and conditions that disprove the existence of a joint venture and disprove any agreement to share profits at 50%. The actual amount shared is 10% after repayment of the return of equity to Underwood Partners (which Plaintiff contends is the vehicle through which Defendant TWINROCK PARTNERS acted) and a further offset of an 8% annual return on the investment. There is clearly no agreement to a 50% sharing or even an in *pari passu* sharing of profits.

8. The Court does not reach the issue of whether the Confidential Information Memorandum contains trade secrets as the lack of the existence of a joint venture is a threshold issue determinative of all claims in the Verified Complaint.

9. The Declaration of Richard Simmons is self-serving and unsupported by any other fact or evidence. *Dennison v. Allen Group Leasing, Corp.*, 110 Nev. 181, 185; 871 P.2d 288, 290-291 (1994).

10. Plaintiff has produced no credible evidence supporting the existence of a joint

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venture between Plaintiff and Defendant and therefore summary judgment should be and is granted.

11. No additional discovery was requested pursuant to NRCP 56(f) at any time and therefore the parties agreed it was proper for this Court to proceed on the Motion for Summary Judgment as set forth herein.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Defendant TWINROCK PARTNERS, LLC's Motion for Summary Judgment is granted.

DATED this 24 day of ~~October~~ November, 2015.

HONORABLE JOANNA S. KISHNER

Respectfully submitted by:

THE WRIGHT LAW GROUP, P.C.

JOHN HENRY WRIGHT
Nevada Bar No. 6182
THE WRIGHT LAW GROUP, P.C.
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Attorney for Defendant

Approved as to form/content

THE BALL LAW GROUP

ZACHARY T. BALL, ESQ.
3455 Cliff Shadows Parkway, #150
Las Vegas, Nevada 89129
Attorneys for Plaintiff

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CLERK OF THE COURT

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Telephone: (702) 405-0001
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Attorney for TWINROCK PARTNERS, LLC

DISTRICT COURT

CLARK COUNTY, NEVADA

G2 VENTURES, LLC, a Nevada Limited Liability Company, Plaintiff, vs. TWINROCK PARTNERS, LLC, a California Limited Liability Company; DOES I-X, and ROES I-X, inclusive, Defendants.	CASE NO. A-15-720835-C DEPT. NO. XXXI

NOTICE OF ENTRY OF ORDER

NOTICE IS HEREBY GIVEN that a Findings of Fact, Conclusion of Law and Order Granting Defendant Twinrock Partners, LLC's Motion for Summary Judgment, was entered on December 2, 2015, a copy of which is hereto attached as Exhibit 1.

Dated this 3rd day of December, 2015

JOHN HENRY WRIGHT, ESQ.
Nevada Bar No. 6182
THE WRIGHT LAW GROUP
2340 Paseo Del Prado, Suite D-305
Las Vegas, Nevada 89102
Telephone: (702) 405-0001
Facsimile: (702) 405-8454
Attorney for Plaintiffs

THE WRIGHT LAW GROUP P.C.
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Las Vegas, Nevada 89102
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing NOTICE OF ENTRY OF ORDER was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 3rd **day of December, 2015.** Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:[1]

THE BALL LAW GROUP
Zachary T. Ball, Esq. **zball@balllawgroup.com**

I further certify that I served a copy of this document by Electronic mail a true and correct copy, addressed to:

an employee of THE WRIGHT LAW GROUP, P.C.

THE WRIGHT LAW GROUP P.C.
2340 Paseo Del Prado, Suite D-305
Las Vegas, Nevada 89102
Tel: (702) 405-0001 Fax: (702) 405-8454

[1] Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

EXHIBIT 1

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CLERK OF THE COURT

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Email: john@wrightlawgroupnv.com
Attorney for Defendant
TWINROCK PARTNERS, LLC

DISTRICT COURT

CLARK COUNTY, NEVADA

G2 VENTURES, LLC, a Nevada Limited Liability Company, Plaintiff, vs. TWINROCK PARTNERS, LLC, a California Limited Liability Company; DOES I-X, and ROES I-X, inclusive, Defendants.	CASE NO. A-15-720835-C DEPT. NO. XXXI

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Tel: (702) 405-0001 Fax: (702) 405-8454

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER GRANTING DEFENDANT TWINROCK PARTNERS, LLC'S MOTION FOR SUMMARY JUDGMENT

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FINDINGS OF FACT

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☐ Voluntary Dismissal
☐ Involuntary Dismissal
☐ Stipulated Dismissal
☐ Motion to Dismiss by Deft(s)

☒ Summary Judgment
☐ Stipulated Judgment
☐ Default Judgment
☐ Judgment of Arbitration

11-00-15 P03:10 IN

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Preliminary and Permanent Injunction, (3) Breach of Fiduciary Duty; (4) Breach of Contract Implied in Fact; (5) Misappropriation of Trade Secrets; (6) Breach of Confidence; (7) Conversion; (8) Restitution; and (9) Accounting. All of these claims arise out of the allegation of the existence of a joint venture between Plaintiff G2 Ventures and Defendant Twinrock Partners.

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3. Plaintiff filed an Opposition to the Motion for Summary Judgment attaching a Declaration which is a restatement of paragraphs 9-35 of the Verified Complaint.

4. Plaintiff did not request additional discovery pursuant to NRCP 56(f).

5. Plaintiff's sole evidence is a document entitled "G2 Ventures LLC Confidential Information Memorandum" which is a 4 page document referring to a an Advisory Opinion of the Nevada Real Estate Division from December 12, 2012, a News Article from December 9, 2012 and a portion of a publication from ForeclosureRadar from January 6, 2013.

6. The Confidential Information Memorandum specifically requires that "any agreement with G2 Ventures and/or its principals requires a written agreement". (page 2 at footnote 1).

7. A Management and Services Agreement was ~~executed on~~ dated April 15, 2013 between two different parties, Summit Real Estate Group, Inc. and Underwood Partners, LLC, neither of whom is party to the instant litigation. (See Exhibit "A")

8. Plaintiff refers to this Agreement as evidence of the employment of the Confidential Information Memorandum in furtherance of the joint venture. Verified Complaint at paragraph 26.

9. The Management and Services Agreement contains an "entire agreement" provision [6b] which states:

> This Agreement contains the entire and complete understanding between the parties concerning its subject matter and all representations; agreements; arrangments and understandings between or among the parties, whether oral or

written, have been fully merged herein and are superseded hereby.

10. Plaintiff claims the implied joint venture was intended to be in *pari passu* which means proportionally. Verified Complaint at paragraph 3. Plaintiff ~~claims~~ alleges this entitles it to 50% of any profit realized by Defendant for any of the properties it purchased since the sharing of the Confidential Information Memorandum but does not admit any liability for losses. The Confidential Information Memorandum contains no provision for any sharing of profits or losses from its use. The Management and Services Agreement provides for a sharing of net profits at a rate of 90% to the investor-10% (after an 8% return and return of equity to the party providing the funds for the purchase of properties) to the party providing the knowledge. [provision 4]

11. Underwood Partners (which Plaintiff contends is the vehicle through which Defendant TWINROCK PARTNERS acted) has contributed over $1,000,000 for the purchase, repair, and maintenance of approximately 40 properties and Plaintiff G2 Ventures has contributed $0.00. Plaintiff has provided no evidence that it has contributed any monies for the purchase, repair and maintenance of the alleged 30-60 additional properties purchased by Defendant TWINROCK PARTNERS.

12. Plaintiff has shown no evidence that it had any voice in the control of the purchase of properties ~~in any way, shape or form~~. Instead, counsel stated that it "heard on the street" properties were purchased.

13. Plaintiff produced no evidence of the existence of a joint venture between itself and Defendant TWINROCK PARTNERS.

14. ~~Plaintiff produced no evidence that the~~ Based on what was presented to the Court, the Court cannot determine that the Confidential Information Memorandum contains any trade secrets.

CONCLUSIONS OF LAW

1. In order to show the existence of a joint venture, Plaintiff must establish (1) the existence of an express or implied agreement; (2) a common purpose that the group intends to carry out; (3) the rights of the parties to share profits and losses; and (4) the existence of an equal voice in controlling the project. *Bank of California v.*

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Connolly, 36 Cal. App. 3d 350, 364-365; 111 Cal. Rptr. 468, 477-478 (1973). *Black's Law Dictionary*, 9th Ed. p. 915 (2009). Plaintiff has failed to show any of these elements exist.

2. There is no express or implied agreement between Plaintiff and Defendant.

3. There is no course of dealing indicating the existence of a joint venture.

4. The Confidential Information Memorandum contains no evidence of any agreement as to the sharing of profits, losses or control.

5. Underwood Partners' (which Plaintiff contends is the vehicle through which Defendant TWINROCK PARTNERS acted) complete funding of the purchase price, repair and maintenance costs of all properties as well as responsibility to the various home owners associations is contrary to the existence of a joint venture.

6. Plaintiff failed to provide any evidence of any control or voice in the control of the alleged joint venture.

7. The Management and Services Agreement to which Plaintiff refers as the establishment of the joint venture clearly denies the existence of a joint venture and contains terms and conditions that disprove the existence of a joint venture and disprove any agreement to share profits at 50%. The actual amount shared is 10% after repayment of the return of equity to Underwood Partners (which Plaintiff contends is the vehicle through which Defendant TWINROCK PARTNERS acted) and a further offset of an 8% annual return on the investment. There is clearly no agreement to a 50% sharing or even an in *pari passu* sharing of profits.

8. The Court does not reach the issue of whether the Confidential Information Memorandum contains trade secrets as the lack of the existence of a joint venture is a threshold issue determinative of all claims in the Verified Complaint.

9. The Declaration of Richard Simmons is self-serving and unsupported by any other fact or evidence. *Dennison v. Allen Group Leasing, Corp.*, 110 Nev. 181, 185; 871 P.2d 288, 290-291 (1994).

10. Plaintiff has produced no credible evidence supporting the existence of a joint

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venture between Plaintiff and Defendant and therefore summary judgment should be and is granted.

11. No additional discovery was requested pursuant to NRCP 56(f) at any time and therefore the parties agreed it was proper for this Court to proceed on the Motion for Summary Judgment as set forth herein.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Defendant TWINROCK PARTNERS, LLC's Motion for Summary Judgment is granted.

DATED this 24 ,day of ~~October~~ November, 2015.

HONORABLE JOANNA S. KISHNER

Respectfully submitted by:

THE WRIGHT LAW GROUP, P.C.

JOHN HENRY WRIGHT
Nevada Bar No. 6182
THE WRIGHT LAW GROUP, P.C.
2340 Paseo Del Prado, Suite D-305
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Attorney for Defendant

Approved as to form/content

THE BALL LAW GROUP

ZACHARY T. BALL, ESQ.
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Attorneys for Plaintiff

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DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	COURT MINUTES	October 13, 2015

A-15-720835-C G2 Ventures LLC, Plaintiff(s)
vs.
TwinRock Partners LLC, Defendant(s)

October 13, 2015 **9:30 AM** **Motion for Summary Judgment**

HEARD BY: Kishner, Joanna S. COURTROOM: RJC Courtroom 12B

COURT CLERK: Sandra Harrell

RECORDER: Debbie Winn

REPORTER:

PARTIES PRESENT:

Ball, Zachary T	Attorney
Cella, Christopher L,	Attorney
Wright, John H.	Attorney

JOURNAL ENTRIES

- Arguments by counsel. Court stated its findings, and ORDERED, Defendant Twinrock Partners, LLC's Motion for Summary Judgment is GRANTED. Defense counsel to prepare the Order, to include findings of fact and conclusions of law, circulating to Plaintiff's counsel for approval as to form and content. Matter SET for Status Check regarding receipt of proposed order.

10/29/15 STATUS CHECK: ORDER (CHAMBERS)

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	COURT MINUTES	January 26, 2016

A-15-720835-C G2 Ventures LLC, Plaintiff(s)
vs.
TwinRock Partners LLC, Defendant(s)

January 26, 2016 **10:00 AM** **Motion to Reconsider**

HEARD BY: Kishner, Joanna S. COURTROOM: RJC Courtroom 12B

COURT CLERK: Sandra Harrell

RECORDER: Rachelle Hamilton

REPORTER:

PARTIES
PRESENT:

Karoum, Adele V., ESQ	Attorney
Wakayama, Liane K.	Attorney
Wright, John H.	Attorney

JOURNAL ENTRIES

- Also present, Rick Simmons, Principle for G2 Ventures.
Upon Court's inquiry, Ms. Wakayama states typo in pleading and is moving under EDCR 2.24 and NRCP 59(e) (not NRCP 62(e)). Mr. Wright objected. Colloquy. Mw. Wayayama states she is moving under EDCR 2.24 only. Arguments by counsel. Court stated its findings, and ORDERED, Plaintiff G2 Venture's Motion for Reconsideration of Order Granting Summary Judgment is DENIED. Mr. Wright to prepare the Order, circulating to Ms. Wakayama for approval as to form and content. Matter SET for Status Check regarding receipt of proposed order.

2/12/16 STATUS CHECK: ORDER (CHAMBERS)

Certification of Copy

State of Nevada
County of Clark } **SS:**

I, Steven D. Grierson, the Clerk of the Court of the Eighth Judicial District Court, Clark County, State of Nevada, does hereby certify that the foregoing is a true, full and correct copy of the hereinafter stated original document(s):

NOTICE OF APPEAL; CASE APPEAL STATEMENT; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET; FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER DENYING PLAINTIFF G2 VENTURES, LLC'S MOTIONS OF REHEARING AND RECONSIDERATION OF ORDER GRANTING SUMMARY JUDGMENT; NOTICE OF ENTRY OF ORDER; FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER GRANTING DEFENDANT TWINROCK PARTNERS, LLC'S MOTION FOR SUMMARY JUDGMENT; NOTICE OF ENTRY OF ORDER; DISTRICT COURT MINUTES

G2 VENTURES LLC,

Plaintiff(s),

vs.

TWINROCK PARTNERS, LLC,

Defendant(s),

Case No: A720835

Dept No: XXXI

now on file and of record in this office.

IN **WITNESS THEREOF**, I have hereunto
Set my hand and Affixed the seal of the
Court at my office, Las Vegas, Nevada
This 15 day of April 2016.

Steven D. Grierson, Clerk of the Court

Heather Ungermann

Heather Ungermann, Deputy Clerk

MARQUIS AURBACH COFFING • Attorneys at Law

117877

WKL *Clerk of the Supreme Court* 4/14/2016 ***$250.00***

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