Vinesign Document ID: 482D6AE5-A341-40DE-BE54-F6F6F59687F8

Electronically Filed
10/30/2023 4:47 PM
Steven D. Grierson
CLERK OF THE COURT

~~NOA~~ NOAS

Manoucher Dezfoolo
2074 Troon Drive,
Henderson, NV 89074
In Proper Person

Electronically Filed
Nov 03 2023 11:10 AM
Elizabeth A. Brown
Clerk of Supreme Court

DISTRICT COURT
CLARK COUNTY, NEVADA

THE EHH VENTURE, LLC., a Nevada limited liability company

Plaintiff,

vs.

MEELAD M. DEZFOOLI, an individual; JOSE BOLANOS, an individual; and DOES 1-10, and ROE ENTITIES 1-10 inclusive.

Defendants.

THE EHH VENTURE, LLC., a Nevada limited liability company

Plaintiff,

vs.

BEST BUY FLOORS LTD., dba BEST BUY FLOORING, a Nevada limited liability company; and DOES 1-10, and ROE ENTITIES -1-10 inclusive.

Defendants.

BEST BUY FLOORS LTD., dba BEST BUY FLOORING, a Nevada limited liability company.

Counterclaimant

vs

THE EHH VENTURE, LLC., a Nevada limited liability company; and DOES 1-10, and ROE ENTITIES -1-10 inclusive

Counter-Defendants.

Case No. **A-16-746034-C**
Dept No. **31**

NOTICE OF APPEAL

The signed document can be validated at https://app.vinesign.com/Verify

Notice is hereby given that MANOUCHER DEZFOOLO, hereby appeals to the Supreme Court of Nevada from the District Court's Order Denying Manoucher Dezfoolo's Motion to Release Bond; and Granting The EHH Venture, LLC's Countermotion For Release Of Bond To Plaintiff Pursuant To This Court's March 5, 2021 Order and the Notice of Entry of Order entered in this action on September 29, 2023.

DATED this 10/30/2023 day of October, 2023.

Manoucher Dezfoolo In Proper Person

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HINDS INJURY LAW LAS VEGAS, LLC., that I am a citizen of the United States am employed in Clark County, where this service occurs. I am over the age of 18 years and not a party to the within cause. That on this 10/30/2023 day of _____, 2023, I served a true and complete copy of the foregoing document described as **NOTICE OF APPEAL** in the following manner(s) indicated, to individual(s) listed below:

____X___ BY E-SERVICE: in compliance with NRCP 5 and the NEFCR

James E. Shapiro, Esq.
Andrew S. Blaylock, Esq.
SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite #130
Henderson, NV 89074
jshapiro@smithshapiro.com

Meelad M. Dezfooli In Proper Person

Electronically Filed
11/1/2023 2:44 PM
Steven D. Grierson
CLERK OF THE COURT

ASTA

IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA IN AND FOR THE COUNTY OF CLARK

THE EHH VENTURE LLC,

Plaintiff(s),

vs.

MEELAD DEZOOLI; JOSE BOLANOS,

Defendant(s),

Case No: A-16-746034-C

Dept No: XXXI

CASE APPEAL STATEMENT

1. Appellant(s): Manoucher Dezfoolo

2. Judge: Joanna Kishner

3. Appellant(s): Manoucher Dezfoolo

Counsel:

Manoucher Dezfoolo
2074 Troon Dr.
Henderson, NV 89074

4. Respondent (s): The EHH Venture, LLC

Counsel:

James E. Shapiro, Esq.
3333 E. Serene Ave., Ste. #130
Henderson, NV 89074

Case Number: A-16-746034-C

5. Appellant(s)'s Attorney Licensed in Nevada: N/A
Permission Granted: N/A

Respondent(s)'s Attorney Licensed in Nevada: Yes
Permission Granted: N/A

6. Has Appellant Ever Been Represented by Appointed Counsel In District Court: No

7. Appellant Represented by Appointed Counsel On Appeal: N/A

8. Appellant Granted Leave to Proceed in Forma Pauperis**: N/A
***Expires 1 year from date filed*
Appellant Filed Application to Proceed in Forma Pauperis: No
Date Application(s) filed: N/A

9. Date Commenced in District Court: November 2, 2023

10. Brief Description of the Nature of the Action: Breach of Contract

Type of Judgment or Order Being Appealed: Judgment

11. Previous Appeal: No

Supreme Court Docket Number(s): N/A

12. Child Custody or Visitation: N/A

13. Possibility of Settlement: Unknown

Dated This 1 day of November 2023.

Steven D. Grierson, Clerk of the Court

/s/ Cierra Borum
Cierra Borum, Deputy Clerk
200 Lewis Ave
PO Box 551601
Las Vegas, Nevada 89155-1601
(702) 671-0512

cc: Manoucher Dezfoolo

Electronically Filed
11/1/2023 2:55 PM
Steven D. Grierson
CLERK OF THE COURT

ASTA

IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA IN AND FOR THE COUNTY OF CLARK

THE EHH VENTURE LLC,

Plaintiff(s),

vs.

MEELAD DEZOOLI; JOSE BOLANOS,

Defendant(s),

Case No: A-16-746034-C
Consolidated with A-16-748846-C
Dept No: XXXI

Amended

CASE APPEAL STATEMENT

1. Appellant(s): Manoucher Dezfoolo

2. Judge: Joanna Kishner

3. Appellant(s): Manoucher Dezfoolo

Counsel:

Manoucher Dezfoolo
2074 Troon Dr.
Henderson, NV 89074

4. Respondent (s): The EHH Venture, LLC

Counsel:

James E. Shapiro, Esq.
3333 E. Serene Ave., Ste. #130
Henderson, NV 89074

Case Number: A-16-746034-C

5. Appellant(s)'s Attorney Licensed in Nevada: N/A
Permission Granted: N/A

Respondent(s)'s Attorney Licensed in Nevada: Yes
Permission Granted: N/A

6. Has Appellant Ever Been Represented by Appointed Counsel In District Court: No

7. Appellant Represented by Appointed Counsel On Appeal: N/A

8. Appellant Granted Leave to Proceed in Forma Pauperis**: N/A
***Expires 1 year from date filed*
Appellant Filed Application to Proceed in Forma Pauperis: No
Date Application(s) filed: N/A

9. Date Commenced in District Court: November 2, 2023

10. Brief Description of the Nature of the Action: Breach of Contract

Type of Judgment or Order Being Appealed: Judgment

11. Previous Appeal: No

Supreme Court Docket Number(s): N/A

12. Child Custody or Visitation: N/A

13. Possibility of Settlement: Unknown

Dated This 1 day of November 2023.

Steven D. Grierson, Clerk of the Court

/s/ Cierra Borum
Cierra Borum, Deputy Clerk
200 Lewis Ave
PO Box 551601
Las Vegas, Nevada 89155-1601
(702) 671-0512

cc: Manoucher Dezfoolo

EIGHTH JUDICIAL DISTRICT COURT

CASE SUMMARY

CASE NO. A-16-746034-C

EHH Venture LLC, Plaintiff(s)	§	Location:	**Department 31**
vs.	§	Judicial Officer:	**Kishner, Joanna S.**
Meelad Dezfooli, Defendant(s)	§	Filed on:	**11/02/2016**
	§	Cross-Reference Case Number:	**A746034**

CASE INFORMATION

Related Cases
A-16-748846-C (Consolidated)

Case Type: **Other Contract**

Case Status: **04/01/2021 Closed**

Statistical Closures
04/01/2021 Default Judgment
08/01/2019 Judgment Reached (bench trial)

Warrants
Bench Warrant - Dezfooli, Meelad M (Judicial Officer: Kishner, Joanna S.)
06/02/2020 4:47 PM Returned - Served
Fine: $0
Bond: **$10,000.00** **Any**

Bonds
Cash $.00
3/1/2021 Entered in Error
2/23/2021 Posted
Counts:

Cash #PT-2021-01562 $.00
3/1/2021 Entered in Error
2/23/2021 Posted
Counts:

Cash $10,000.00
2/23/2021 Posted
Counts:

DATE — CASE ASSIGNMENT

Current Case Assignment

Case Number	A-16-746034-C
Court	Department 31
Date Assigned	11/02/2016
Judicial Officer	Kishner, Joanna S.

PARTY INFORMATION

Plaintiff	**EHH Venture LLC**	**Shapiro, James E.** *Retained* 702-318-5033(W)
Defendant	**Bolanos, Jose**	
	Dezfooli, Meelad M	

DATE — EVENTS & ORDERS OF THE COURT — INDEX

EVENTS

11/02/2016 Complaint
Filed By: Plaintiff EHH Venture LLC
[1] Complaint

11/03/2016	Initial Appearance Fee Disclosure Filed By: Plaintiff EHH Venture LLC *[2] Initial Appearance Fee Disclsoure*
11/29/2016	Affidavit of Service Filed By: Plaintiff EHH Venture LLC *[3] Affidavit of Service*
11/29/2016	Affidavit of Service Filed By: Plaintiff EHH Venture LLC *[4] Affidavit of Service - Meelad Dezfooli*
12/12/2016	Answer to Complaint Filed by: Defendant Dezfooli, Meelad M *[5] Answer To Complaint*
12/13/2016	Initial Appearance Fee Disclosure Filed By: Defendant Dezfooli, Meelad M *[6] Initial Appearance Fee Disclosure*
12/14/2016	Motion for Summary Eviction Filed By: Defendant Dezfooli, Meelad M *[7] Defendant Meelad Dezfooli's Affidavit In Contravention Of Five-Day Notice on Summary Eviction, Request For Hearing, And Motion For Order Preventing Plaintiff From Locking Out Defendant And From Further Attempts At Summary Eviction*
12/16/2016	Application for Entry of Default Filed By: Plaintiff EHH Venture LLC *[8] Application for Entry of Default*
12/19/2016	Objection Filed By: Defendant Dezfooli, Meelad M *[9] Defendant, Meelad Dezfooli's Objection To Plaintiff's Application For Entry of Default And Affidavit In Support Of Application For Default Against Defendant, Jose Bolanos*
12/28/2016	Default Filed By: Plaintiff EHH Venture LLC *[10] Default of Defendant Jose Bolanos*
12/29/2016	Notice of Entry of Default Party: Plaintiff EHH Venture LLC *[11] Notice of Entry of Default of Defendant Jose Bolanos*
01/05/2017	Opposition to Motion Filed By: Plaintiff EHH Venture LLC *[12] Opposition to Motion for Order Preventing Plaintiff from Locking Out Defendant and From Further Attempts at Summary Eviction*
01/20/2017	Affidavit of Service Filed By: Plaintiff EHH Venture LLC *[13] Affidavit of Service - Best Floors Ltd. dba Best Buy Flooring, a Nevada Limited Liability Company*
02/06/2017	

	Individual Case Conference Report Filed By: Plaintiff EHH Venture LLC *[14] Individual Case Conference Report Pursuant to N.R.C.P. 16.1*
02/22/2017	Stipulation and Order Filed by: Plaintiff EHH Venture LLC *[15] Stipulation and Order to Continue Hearing on Motion for Order Preventing Plaintiff From Locking Out Defendant*
02/23/2017	Notice of Entry of Stipulation and Order Filed By: Plaintiff EHH Venture LLC *[17] Notice of Entry of Stipulation and Order to Continue Hearing on Motion for Order Preventing Plaintiff from Locking Out Defendant*
03/03/2017	Commissioners Decision on Request for Exemption - Granted *[18] Commissioner's Decision on Request for Exemption - Granted*
03/03/2017	Arbitration File *[19] Arbitration File*
03/15/2017	Notice to Appear for Discovery Conference *[20] Notice to Appear for Discovery Conference*
03/16/2017	Early Case Conference Report Filed By: Defendant Dezfooli, Meelad M *[21] Defendant's Individual Case Conference Report Pursaunt to NRCP 16.1*
03/29/2017	Scheduling Order *[22] Scheduling Order*
04/10/2017	Notice of Compliance Party: Plaintiff EHH Venture LLC *[23] Notice of Compliance*
04/26/2017	Order Setting Civil Jury Trial, Pre-Trial, and Calendar Call *[24] Order Setting Civil Non-Jury Trial, Pre-Trial Conference, Calendar Call, and Status Check*
05/22/2017	Notice of Hearing *[25] Notice of Hearing on Stipulation and Order to Stay Proceedings*
07/25/2017	Stipulation and Order Filed by: Plaintiff EHH Venture LLC *[26] Stipulation and Order to Consolidate Case No. A-16-746034-C With Case No. A-16-748846-C; Stipulation and Order to Extend Discovery (First Request); and Stipulation and Order to Continue Trial Setting*
07/26/2017	Notice of Entry of Stipulation and Order Filed By: Plaintiff EHH Venture LLC *[27] Notice of Entry of Stipulation and Order to Consolidate Case No. A-16-746064-C With Case No. A-16-748846-C; Stipulation and Order to Extend Discovery (First Request); and Stipulation and Order to Continue Trial*
08/09/2017	Amended Order Setting Civil Non-Jury Trial

[28] Amended Order Setting Civil Non-Jury Trial, Pre-Trial Conference, Calendar Call, and Status Check

08/14/2017 Application
Filed By: Plaintiff EHH Venture LLC
[29] Second Renewed Application for Order to Show Cause Why Defendant Should not be Held in Contempt & Why a Temporary Writ of Restitution Should not Issue on Order Shortening Time

08/18/2017 Certificate of Service
Filed by: Plaintiff EHH Venture LLC
[30] Certificate of Service

08/18/2017 Order to Show Cause
Filed by: Plaintiff EHH Venture LLC
[31] Order to Show Cause Why Defendant Best Floors LTD dba Best Buy Flooring Should Not Be Held In Contempt for Violating an Order of the Court and Why a Temporary Writ of Restitution Should Not Issue

08/22/2017 Notice of Entry of Order
Filed By: Plaintiff EHH Venture LLC
[32] Notice of Entry of Order to Show Cause Why Defendant Best Floors Ltd dba Best Buy Flooring Should not be Held in Contempt for Violating an Order of the Court and Why a Temporary Writ of Restitution Should not Issue

09/07/2017 Supplement
Filed by: Plaintiff EHH Venture LLC
[33] Plaintiff's Supplement to Second Renewed Application for Order to Show Cause Why Defendant Should not be Held in Contempt & Why a Temporary Writ of Restitution Should not Issue on Order Shortening Time

09/08/2017 Opposition and Countermotion
Filed By: Defendant Dezfooli, Meelad M
[34] Opposition To Plaintiff s Second Renewed Application For Order To Show Cause Why Defendant Should Not Be Held In Contempt & Why A Temporary Writ Of Restitution Should Not Issue On Order Shortening Time And Countermotion For Sanctions And Award For Attorney Fees And Costs

09/11/2017 Reply to Opposition
Filed by: Plaintiff EHH Venture LLC
[35] Plaintiff's Reply to Defendant's Opposition to Second Renewed Application for Order to Show Cause Why Defendant Should not be Held in Contempt & Why a Temporary Writ of Restitution Should not Issue on Order Shortening Time and Countermotion for Sanctions and Award for Attorney Fees and Cost

09/20/2017 Motion to Compel
Filed By: Plaintiff EHH Venture LLC
[36] Plaintiff's Motion to Compel Discovery

09/22/2017 Motion for Withdrawal
[37] Motion to Withdraw as Attorney of Record on Order Shortening Time

09/25/2017 Certificate of Service
Filed by: Defendant Dezfooli, Meelad M
[38] Certificate Of Service

09/28/2017

	Opposition to Motion *[39] Plaintiff's Opposition to Motion to Withdraw as Attorney of Record*
10/13/2017	Notice of Non Opposition Filed By: Plaintiff EHH Venture LLC *[40] Notice of Non-Opposition and Request for Ruling Re: Plaintiff's Motinon to Compel Discovery*
10/17/2017	Order Granting Filed By: Defendant Dezfooli, Meelad M *[41] Order Granting Motion To Withdraw As Counsel Of Record*
10/17/2017	Notice of Entry of Order Filed By: Defendant Dezfooli, Meelad M *[42] Notice Of Entry Of Order Granting Motion To Withdraw As Counsel Of Record*
10/18/2017	Addendum Filed By: Plaintiff EHH Venture LLC *[43] Addendum to Notice of Non-Opposition and Request for Ruling Re:Plaintiff's Motion to Compel Discovery*
10/26/2017	Motion to Compel Filed By: Plaintiff EHH Venture LLC *[44] Plaintiff's Second Motion to Compel Discovery*
10/30/2017	Notice of Appearance Party: Defendant Dezfooli, Meelad M *[45] (A746034, A748846) Notice of Appearance and Request for Notice*
12/05/2017	Order Filed By: Defendant Dezfooli, Meelad M *[46] Order on Plaintiff's Second Renewed Application for Order to Show Cause Why Defendant Should Not be Held in Contempt & Why a Temporary Writ of Restitution Should Not Issue*
12/06/2017	Notice of Entry of Order Filed By: Defendant Dezfooli, Meelad M *[47] Notice of Entry of Order*
12/13/2017	Stipulation and Order Filed by: Plaintiff EHH Venture LLC *[48] (A746034, A748846) Stipulation and Order Re: Plaintiff's Request for Attorney Fees*
12/13/2017	Notice of Entry of Stipulation and Order Filed By: Plaintiff EHH Venture LLC *[49] Notice of Entry of Stipulation and Order Re:Plaintiff's Request for Attorney Fees*
01/02/2018	Stipulation to Extend Discovery Party: Plaintiff EHH Venture LLC *[50] Stipulation and Order to Extend Discovery (Second Request); and Stipulation and Order to Continue Trial Setting*
01/03/2018	Notice of Entry of Stipulation and Order Filed By: Plaintiff EHH Venture LLC

[51] Notice of Entry of Stipulation and Order to Extend Discovery (Second Request); and Stipulation and Order to Continue Trial Setting

02/22/2018 Recorders Transcript of Hearing
[52] Transcript - All Pending Motions 11/2/17

02/23/2018 Amended Order Setting Civil Non-Jury Trial
[53] Amended Order Setting Civil Non-Jury Trial, Pre Trial Conference, Calendar Call and Status Check

04/06/2018 Stipulation and Order
Filed by: Plaintiff EHH Venture LLC
[54] Stipulation And Order To Extend Discovery (Third Request) And Stipulation And Order To Continue Trial Setting

04/10/2018 Amended Order Setting Civil Non-Jury Trial
[55] Amended Order Setting Civil Non Jury Trial, Pre Trial Conference, Calendar Call and Status Check

07/12/2018 Proof of Service
Filed by: Plaintiff EHH Venture LLC
[56] PROOF OF SERVICE RE: JOSE BOLANOS

09/17/2018 Motion to Withdraw As Counsel
Filed By: Defendant Dezfooli, Meelad M
[57] Motion to Withdraw as Attorney of Record on Order Shortening Time

09/17/2018 Receipt of Copy
Filed by: Defendant Dezfooli, Meelad M
[58] Receipt of Copy (Best Floors Ltd dba Best Buy Flooring)

09/17/2018 Receipt of Copy
Filed by: Defendant Dezfooli, Meelad M
[59] Receipt of Copy (The EHH Venture LLC)

09/17/2018 Certificate of Service
Filed by: Defendant Dezfooli, Meelad M
[60] Certificate of Service

09/26/2018 Motion in Limine
Filed By: Plaintiff EHH Venture LLC
[61] Plaintiff's Motion in Limine

10/09/2018 Order Granting Motion
Filed By: Defendant Dezfooli, Meelad M
[62] Order Granting Motion to Withdraw as Attorney of Record on Order Shortening Time

10/10/2018 Notice of Entry of Order
Filed By: Defendant Dezfooli, Meelad M
[63] Notice of Entry of Order

11/09/2018 Order Granting Motion
[64] Order Granting Plaintiff's Motion In Limine

11/12/2018	Notice of Entry of Order *[65] Notice of Entry of Order Granting Plaintiff's Motion in Limine*
11/26/2018	Notice of Appearance Party: Defendant Dezfooli, Meelad M *[66] Notice of Appearance*
11/27/2018	Order Setting Civil Non-Jury Trial and Calendar Call *[67] Amended Order Setting Civil Non-Jury Trial, Pre-Trial Conference, Calendar Call, and Status Check*
01/29/2019	Pre-trial Memorandum Filed by: Plaintiff EHH Venture LLC *[68] Plaintiff's Pre-Trial Memorandum*
02/05/2019	Proof of Service Filed by: Plaintiff EHH Venture LLC *[69] Proof of Service (Jose Bolanos)*
02/05/2019	Proof of Service Filed by: Plaintiff EHH Venture LLC *[70] Proof of Service (Octavio Terrazas)*
02/05/2019	Trial Subpoena Filed by: Plaintiff EHH Venture LLC *[71] Trial Subpoena*
02/05/2019	Trial Subpoena Filed by: Plaintiff EHH Venture LLC *[72] Trial Subpoena*
02/07/2019	Application Filed By: Plaintiff EHH Venture LLC *[73] Third Renewed Application for Order to Show Cause Why Defendant Should not be Held in Contempt & Why a Temporary Writ of Restitution Should not Issue on Order Shortening Time*
02/07/2019	Order to Show Cause Filed by: Plaintiff EHH Venture LLC *[76] Order to Show Cause*
02/08/2019	Deposition Filed By: Plaintiff EHH Venture LLC *[74] Plaintiff's Deposition Designations (Mark Anthony)*
02/08/2019	Proof of Service Filed by: Plaintiff EHH Venture LLC *[75] Proof of Service*
02/08/2019	Notice of Entry of Order Filed By: Plaintiff EHH Venture LLC *[77] Notice of Entry of Order to Show Cause Why Defendant Best Floors Ltd dba Best Buy Flooring Should not be Held in Contempt for Violating an Order of the Court and Why a Temporary Writ of Restitution Should not Issue*

02/19/2019	Order to Show Cause Filed by: Plaintiff EHH Venture LLC *[78] Order Granting Plaintiff's Third Renewed Application for Order to Show Cause Why Defendant Should Not be Held in Contempt and Why a Temporary Writ of Restitution Should Not Issue, (2) Striking Meelad Dezfooli's Answer, (3) Striking Best Floors Ltd.'s Answer and Counterclaims, and (3) Enter Default Against Defendants Meelad Dezfooli and Best Floors Ltd dba Best Buy Flooring.*
02/19/2019	Notice of Entry of Order Filed By: Plaintiff EHH Venture LLC *[79] Notice of Entry of Order Granting Plaintiff's Third Renewed Application for Order to Show Cause Why Defendant Should Not be Held in Contempt and Why a Temporary Writ of Restitution Should Not Issue, (2) Striking Meelad Dezfooli's Answer, (3) Striking Best Floors Ltd.'s Answer and Counterclaims, and (3) Enter Default Against Defendants Meelad Dezfooli and Best Floors Ltd dba Best Buy Flooring.*
02/20/2019	Notice of Posting of Cost Bond Filed By: Plaintiff EHH Venture LLC *[80] Notice of Posting Cash in Lieu of Bond*
02/25/2019	Writ of Restitution Filed by: Plaintiff EHH Venture LLC *[81] Temporary of Writ of Restitution*
03/15/2019	Application for Default Judgment Party: Plaintiff EHH Venture LLC *[82] Application for Default Judgment*
03/15/2019	Exhibits Filed By: Plaintiff EHH Venture LLC *[83] Exhibits - Part 2*
03/21/2019	Notice of Hearing Filed By: Plaintiff EHH Venture LLC *[84] Notice of Hearing Regarding Prove Up Default Judgment (Best Floors Ltd. dba Best Buy Flooring)*
03/25/2019	Clerk's Notice of Hearing *[85] Clerk's Notice of Hearing*
03/29/2019	Motion for Relief Filed By: Defendant Dezfooli, Meelad M *[86] Motion for Relief Under NRCP Rule 60(B)*
04/01/2019	Notice of Hearing Filed By: Defendant Dezfooli, Meelad M *[87] Notice of Hearing*
04/11/2019	Opposition Filed By: Defendant Dezfooli, Meelad M *[88] Defedants' Meelad Dezfooli and Best Floors Ltd's Opposition to Plaintiff's Application for Default Judgment*
04/11/2019	Notice of Hearing

Filed By: Defendant Dezfooli, Meelad M
[89] Notice of Hearing

04/11/2019 Clerk's Notice of Hearing
[90] Notice of Hearing

04/12/2019 Opposition to Motion
Filed By: Plaintiff EHH Venture LLC
[91] Opposition to Motion for Relief Under NRCP 60(B)

04/22/2019 Request
Filed by: Defendant Dezfooli, Meelad M
[92] Request to Participate in Default Judgment Hearing

04/30/2019 Stipulation and Order
Filed by: Plaintiff EHH Venture LLC
[93] Stipulation and Order Regarding Briefing Schedule and Hearing

04/30/2019 Notice of Entry of Stipulation and Order
Filed By: Plaintiff EHH Venture LLC
[94] Notice of Entry Stipulation and Order Regarding Briefing Schedule and Hearing

04/30/2019 Response
Filed by: Plaintiff EHH Venture LLC
[95] Plaintiff's Response to Defendants' Request to Participate in Default Judgment Hearing

06/06/2019 Notice of Hearing
[96] Notice of Hearing for Prove-Up Default Judgment hearing

06/11/2019 Order
Filed By: Plaintiff EHH Venture LLC
[97] Order Denying Motion for Relief Under NRCP Rule 60(B)

06/13/2019 Order
Filed By: Plaintiff EHH Venture LLC
[98] Order Re: Defendants' Request to Participate in Default Judgment Hearing

06/13/2019 Notice of Entry of Order
Filed By: Plaintiff EHH Venture LLC
[99] Notice of Entry of Order Denying Motion for Relief Under FRCP 60(B)

06/13/2019 Notice of Entry of Order
Filed By: Plaintiff EHH Venture LLC
[100] Notice of Entry of Order Re: Defendants' Request to Participate in Default Judgment Hearing

08/01/2019 Default Judgment
Filed By: Plaintiff EHH Venture LLC
[101] Default Judgmemt

08/01/2019 Notice of Entry of Default Judgment
Filed By: Plaintiff EHH Venture LLC
[102] Notice of Entry of Default Judgment

08/02/2019	Supplement Filed by: Plaintiff EHH Venture LLC *[103] Supplemental Brief Regarding Treble Damages*
10/14/2019	Writ Electronically Issued *[104] Writ of Execution*
10/22/2019	Order Filed By: Plaintiff EHH Venture LLC *[105] Order Re: Request for Treble Damages*
10/23/2019	Notice of Entry of Order Filed By: Plaintiff EHH Venture LLC *[106] Notice of Entry of Order Re: Request for Treble Damages*
01/14/2020	Ex Parte Application *[107] Ex Parte Application for Charging Order*
01/14/2020	Order *[108] Charging Order*
01/21/2020	Proof of Service *[109] Proof of Service - Charging Order*
01/22/2020	Motion to Compel *[110] Judgment Creditor's Motion to Compel and for Sanctions*
01/22/2020	Writ Electronically Issued *[111] Writ of Execution - Citibank -Dezfooli*
01/22/2020	Writ Electronically Issued *[112] Writ of Execution - Citibank - Best Floors*
01/22/2020	Writ Electronically Issued *[113] Writ of Execution - Best Floors*
01/27/2020	Motion to Compel Filed By: Plaintiff EHH Venture LLC *[114] Notice of Hearing of Judgment Creditor's Motion to Compel and for Sanctions*
01/27/2020	Clerk's Notice of Hearing *[115] Notice of Hearing*
03/13/2020	Motion to Withdraw As Counsel Filed By: Defendant Dezfooli, Meelad M *[116] Motion To Withdraw As Counsel Of Record*
03/16/2020	Clerk's Notice of Hearing *[117] Notice of Hearing*
03/18/2020	Opposition to Motion *[118] Judgment Creditor's Opposition to Motion to Withdraw as Counsel of Record*

03/31/2020	Discovery Commissioners Report and Recommendations *[119] Discovery Commissioner s Report and Recommendations -Originals*
04/15/2020	Order *[120] Order RE: Judgment Creditor's Motion to Compel and for Sanctions*
04/21/2020	Order Denying Motion *[121] Order Denying Whitehead & Burnett's Motion to Withdraw as Counsel of Record*
04/23/2020	Notice of Entry of Order Filed By: Plaintiff EHH Venture LLC *[122] Notice of Entry of Order*
04/24/2020	Motion for Order to Show Cause *[123] Judgment Creditor s Application for Order to Show Cause Why Judgment Debtors Meelad Dezfooli and Best Floors Ltd. dba Best Buy Flooring Should Not be Held in Contempt for Violating an Order of the Court*
04/29/2020	Order to Show Cause *[124] Order to Show Cause Why Judgment Debtors Meelad Dezfooli and Best Floors, LTD d/b/a/ Best Buy Flooring Should not be Held in Contempt for Violating an Order of the Court*
04/29/2020	Order to Show Cause *[125] Order to Show Cause Why Judgment Debtors Meelad Dezfooli and Best Floors Ltd. dba Best Buy Flooring Should Not be Held in Contempt for Violating an Order of the Court*
04/30/2020	Notice of Entry of Order Filed By: Plaintiff EHH Venture LLC *[126] Notice of Entry of Order to Show Cause Why Judgment Debtors Meelad Dezfooli and Best Floors Ltd. dba Best Buy Flooring Should Not be Held in Contempt for Violating an Order of the Court*
04/30/2020	Certificate of Service Filed by: Plaintiff EHH Venture LLC *[127] Certificate of Service*
05/07/2020	Motion to Withdraw As Counsel *[128] Motion to Withdraw As Counsel of Record*
05/08/2020	Clerk's Notice of Hearing *[129] Notice of Hearing*
05/12/2020	Audiovisual Transmission Equipment Appearance Request *[130] Judgment Creditor's Notice to Appear Simultaneous Audiovisual Transmission Equipment at the May 14, 2020 Hearing on Application for OSC*
05/13/2020	Opposition to Motion Filed By: Plaintiff EHH Venture LLC *[131] Judgment Creditor's Opposition to Motion to Withdraw as Counsel of Record*
05/15/2020	Order Granting Judgment Filed By: Plaintiff EHH Venture LLC *[132] (A746034) Order Granting Judgment Creditor's Application for Order to Show Cause*

	Why Judgment Debtors Meelad Dezfooli and Best Floors Ltd. dba Best Buy Flooring Should not be Held in Contempt for Violating an Order of the Court
05/18/2020	Notice of Entry of Order Filed By: Plaintiff EHH Venture LLC *[133] (A746034) NOTICE OF ENTRY OF ORDER GRANTING JUDGMENT CREDITOR S APPLICATION FOR ORDER TO SHOW CAUSE WHY JUDGMENT DEBTORS SHOULD NOT BE HELD IN CONTEMPT FOR VIOLATING AN ORDER OF THE COURT*
05/18/2020	Certificate of Service Filed by: Plaintiff EHH Venture LLC *[134] Certificate of Service*
05/18/2020	Reply to Opposition Filed by: Defendant Dezfooli, Meelad M *[135] Reply to Plaintiff's Judgment Creditor's Opposition to Motion to Withdraw as Counsel of Record.*
05/29/2020	Audiovisual Transmission Equipment Appearance Request *[136] Judgment Creditor's Notice to Appear by Simultaneous Audiovisual Transmission Equipment for the June 2, 2020 Contempt Proceedings*
06/02/2020	Certificate of Service Filed by: Plaintiff EHH Venture LLC *[137] Certificate of Service*
06/10/2020	Bench Warrant *[138] Bench Warrant as to Meelad Dezfooli*
06/10/2020	Order Granting *[139] Order Holding Judgment Debtors/Defendants Meelad Dezfooli and Best Floors, LTD in Contempt of court and Issuance of Bench Warrant*
06/15/2020	Notice of Entry of Order Filed By: Plaintiff EHH Venture LLC *[140] Notice of Entry of Order Holding Judgment Debtors/Defendants Meelad Dezfooli and Best Floors, Ltd. in Contempt of Court and Issuance of Bench Warrant*
06/15/2020	Notice of Entry of Order Filed By: Plaintiff EHH Venture LLC *[141] Notice of Entry of Bench Warrant*
06/22/2020	Order Granting Motion *[142] Order Granting Motion to Withdraw as Counsel of Record for Defendant*
06/22/2020	Notice of Entry of Order Filed By: Defendant Dezfooli, Meelad M *[143] Notice of Entry of Order*
11/05/2020	Motion to Increase Filed By: Plaintiff EHH Venture LLC *[144] Motion to Increase Bail Amount in Bench Warrant for Judgment Debtor Meelad Dezfooli*
11/05/2020	Clerk's Notice of Hearing

[145] Notice of Hearing

11/06/2020 Certificate of Service
[146] Certificate of Service

12/03/2020 Memorandum
[147] Court's Memo RE: Remote appearance for 12/8/20 hearing

12/04/2020 Opposition to Motion
Filed By: Defendant Dezfooli, Meelad M
[148] Defendant Meelad M. Dezfooli's Opposition to Plaintiff's Motion to Increase Bail Amount in Bench Warrant for Judgment Debtor Meelad M Dezfooli

12/11/2020 Bench Warrant
[149] Bench Warrant

12/11/2020 Order Granting
[150] Order Granting Motion to Increase Bail Amount in Bench Warrant for Judgment Debtor Meelad Dezfooli

12/11/2020 Notice of Entry of Order
[151] Notice of Entry of Order Granting Motion to Increase Bail Amount in Bench Warrant for Judgment Debtor Meelad Dezfooli

02/25/2021 Amended Order
[152] Amended Order Granting Motion to Increase Bail Bench Warrant Amount for Judgment Debtor Meelad Dezfooli

02/25/2021 Bench Warrant Return
[153] Re; Meelad Dezfooli

02/25/2021 Notice of Entry of Order
[154] Notice of Entry of Amended Order Granting Motion to Increase Bail Amount in Bench Warrant for Judgment Debtor Meelad Dezfooli

02/25/2021 Writ Electronically Issued
[155] Writ of Execution - Detention Center

02/25/2021 Writ Electronically Issued
[156] Writ of Execution - Clerk of the Court

02/26/2021 Memorandum
[157] Court's Memo RE: Remote Appearance Information for March 2, 2021, Hearing
Please Read Memo in its Entirety

03/01/2021 Initial Appearance Fee Disclosure
Filed By: Defendant Dezfooli, Meelad M
[158] Initial Appearance Fee Disclosure

03/01/2021 Notice of Appearance
Party: Defendant Dezfooli, Meelad M
[159] Notice of Appearance

03/02/2021	Writ Electronically Issued *[160] Writ of Execution*
03/05/2021	Order *[161] Order Regarding Bench Warrant Return for Judgment Debtor Meelad Dezfooli*
03/05/2021	Notice of Entry of Order Filed By: Plaintiff EHH Venture LLC *[162] Notice of Entry of Order Regarding Bench Warrant Return for Judgment Debtor Meelad Dezfooli*
03/25/2021	Status Report Filed By: Plaintiff EHH Venture LLC *[163] Judgment Creditor's Status Report and Supplemental Brief*
03/26/2021	Memorandum *[164] Court's Memo RE: Continuance of Hearing set for March 29, 2021*
03/31/2021	Status Report *[165] Judgment Creditor's 2nd Status Report*
04/01/2021	Order to Statistically Close Case *[166] Civil Order to Statistically Close Case*
07/09/2021	Satisfaction of Judgment *[167] Partial Satisfaction of Judgment*
05/23/2022	Clerk's Refund Request *[168]*
08/16/2023	Motion to Release Funds Filed By: Cash Bond Payer Dezfoolo, Manouchehr *[169] Motion to Release Bond*
08/16/2023	Initial Appearance Fee Disclosure Filed By: Cash Bond Payer Dezfoolo, Manouchehr *[170] Initial Appearance Fee Disclosure*
08/16/2023	Clerk's Notice of Hearing *[171] Notice of Hearing*
08/28/2023	Opposition and Countermotion *[172] Opposition to Motion to Release Bond and Countermotion for Release of Bond to Plaintiff Pursuant to this Court's March 5, 2021 Order*
09/01/2023	Audiovisual Transmission Equipment Appearance Request *[173] Audiovisual Transmission Equipment Appearance Request*
09/05/2023	Reply Filed by: Defendant Dezfooli, Meelad M; Cash Bond Payer Dezfoolo, Manouchehr *[174] Reply to Opposition to Motion to Release Bond*
09/11/2023	

Audiovisual Transmission Equipment Appearance Request
Party: Cash Bond Payer Dezfoolo, Manouchehr
[175] audiovisual Transmission Equipment Appearance Request

09/11/2023 Audiovisual Transmission Equipment Appearance Consent
Party: Cash Bond Payer Dezfoolo, Manouchehr
[176] Audiovisual Transmission Equipment appearance Consent

09/12/2023 Reply
Filed by: Plaintiff EHH Venture LLC
[177] Reply to Opposition to Countermotion for Release of Bond to Plaintiff Pursuant to this Court's March 5, 2021 Order

09/14/2023 Memorandum
*[178] Court's Memo RE: Remote Appearance Information for SEPTEMBER 19, 2023, Hearing **PLEASE REVIEW IN ITS ENTIRETY***

09/29/2023 Order
[179] Order: (1) Denying Manoucher Dezfooli's Motion To Release Bond; And (2) Granting The Ehh Venture, Llc's Countermotion For Release Of Bond To Plaintiff Pursuant To This Court's March 5, 2021 Order

09/29/2023 Notice of Entry of Order
[180] ORDER: (1) DENYING MANOUCHER DEZFOOLIS MOTION TO RELEASE BOND; AND (2) GRANTING THE EHH VENTURE, LLCS COUNTERMOTION FOR RELEASE OF BOND TO PLAINTIFF PURSUANT TO THIS COURTS MARCH 5, 2021 ORDER

10/30/2023 Notice of Withdrawal
Filed by: Defendant Dezfooli, Meelad M; Cash Bond Payer Dezfoolo, Manouchehr
[181] Notice of Withdraw Pursuant to E.D.C.R. 5.302(c)

10/30/2023 Notice of Appeal
Filed By: Defendant Dezfooli, Meelad M; Cash Bond Payer Dezfoolo, Manouchehr
[182] Notice of Appeal

11/01/2023 Case Appeal Statement
Case Appeal Statement

DISPOSITIONS

12/13/2017 **Order** (Judicial Officer: Kishner, Joanna S.)
Debtors: Meelad M Dezfooli (Defendant)
Creditors: EHH Venture LLC (Plaintiff)
Judgment: 12/13/2017, Docketed: 12/13/2017
Total Judgment: 2,500.00

08/01/2019 **Default Judgment Plus Interest** (Judicial Officer: Kishner, Joanna S.)
Debtors: Meelad M Dezfooli (Defendant), Jose Bolanos (Defendant)
Creditors: EHH Venture LLC (Plaintiff)
Judgment: 08/01/2019, Docketed: 08/01/2019
Total Judgment: 350,046.89
Satisfaction: Partial Satisfaction
Comment: 7/9/21 Partial Satisfaction of judgment to Meelad Defooli and Best Floors) (Default Includes Best Floors Ltd in Cons. Case A748846-Joint Default)

HEARINGS

01/17/2017 **Motion** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)

Events: 12/14/2016 Motion for Summary Eviction
Defendant Meelad Dezfooli's Affidavit In Contravention Of Five-Day Notice on Summary Eviction, Request For Hearing, And Motion For Order Preventing Plaintiff From Locking Out Defendant And From Further Attempts At Summary Eviction

MINUTES

Motion for Summary Eviction
Filed By: Defendant Dezfooli, Meelad M
[7] Defendant Meelad Dezfooli's Affidavit In Contravention Of Five-Day Notice on Summary Eviction, Request For Hearing, And Motion For Order Preventing Plaintiff From Locking Out Defendant And From Further Attempts At Summary Eviction
Continued;
Pursuant to fax from counsel - all parties in agreement
Journal Entry Details:
DEFENDANT MEELAD DEZFOOLI'S AFFIDAVIT IN CONTRAVENTION OF FIVE-DAY NOTICE ON SUMMARY EVICTION, REQUEST FOR HEARING, AND MOTION FOR ORDER PREVENTING PLAINTIFF FROM LOCKING OUT DEFENDANT AND FROM FURTHER ATTEMPTS AT SUMMARY EVICTION Court notes matter filed in District Court instead of Justice Court, parties to address Jurisdiction issue. Colloquy. Mr. Thomson states issue may be moot because the Plaintiffs have filed an unlawful detainer action in another department (Dept 9), next motion may be a motion to consolidate. Mr. Blaylock argued standing issue, agree that today's motion is probably moot. Counsel state unlawful detainer hearing set for 2/8/17. COURT ORDERED, matter CONTINUED. CONTINUED TO: 2/21/17 9:30 AM;

03/28/2017 *CANCELED* **Discovery Conference** (9:30 AM) (Judicial Officer: Bulla, Bonnie)
Vacated - per Commissioner

06/22/2017 **Hearing** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Hearing on Stipulation and Order to Stay Proceedings
Set Status Check;
Journal Entry Details:
The Court NOTED the parties submitted a Stipulation and Order to Stay Proceedings and the Court needs additional information as no reason was given for the stay and it was also an open ended stay. Mr. Shapiro indicated that there is another case that has had a number of hearings which will resolve a majority of the issues in this case; the other case before Judge Togliatti is set for trial February 12, 2018. Mr. Thomson indicated that procedurally the cases were filed in reverse; that this case is regarding the guarantee on the lease and because they are alleging continued defaults of that lease, they cannot ascertain what their damage or remedy; and that ideally the unlawful detainer action would have been filed first and then the breach of contract, breach of guarantee would have been filed later; and he did suggest a consolidation which was denied. Court inquired if the cases should not be consolidated as there are overlapping issues. Mr. Thomson indicated that plaintiff could dismiss the case without prejudice and then refile it. Mr. Shapiro indicated he would discuss the matter with his client and that they would either dismiss or move for consolidation. COURT DIRECTED counsel to submit a new stipulation or a status update by noon on June 29, 2017 and ORDERED, matter SET for Status Check on the Court's Chambers Calendar. 6/30/17 (CHAMBERS) STATUS CHECK: DISMISSAL OR STIPULATION TO CONSOLIDATE;

06/30/2017 **Status Check** (3:00 AM) (Judicial Officer: Kishner, Joanna S.)
Status Check: Dismissal or Stipulation to Consolidate
Minute Order - No Hearing Held;
Journal Entry Details:
COURT indicated they have not received an update Re; Stipulation and order for Dismissal or for Consolidation and ORDERED matter SET for in person Status Check. 7/27/17 9:00 A.M. STATUS CHECK: DISMISSAL OR STIPULATION TO CONSOLIDATE CLERK'S NOTE: Counsel is to ensure a copy of the foregoing minute order is distribute to all interested parties; additionally, a copy of the foregoing minute order was distributed electronically to all parties. (6-30-17 ks);

07/27/2017 *CANCELED* **Status Check** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Vacated - per Stipulation and Order

09/07/2017 *CANCELED* **Pre Trial Conference** (10:15 AM) (Judicial Officer: Kishner, Joanna S.)
Vacated - per Stipulation and Order

09/13/2017 **Show Cause Hearing** (9:30 AM) (Judicial Officer: Kishner, Joanna S.)
09/13/2017, 10/03/2017, 11/02/2017
Show Cause Hearing
Set Status Check;
Evidentiary Hearing set
Matter Continued;
Matter Heard;
Set Status Check;
Evidentiary Hearing set
Matter Continued;
Matter Heard;
Set Status Check;
Evidentiary Hearing set
Matter Continued;
Matter Heard;
Journal Entry Details:
Arguments by counsel regarding whether an evidentiary hearing would be necessary. Upon Court's inquiry, Mr. Shapiro stated a settlement conference would not be necessary, noting there is no trust. Colloquy between Court and counsel regarding an evidentiary hearing. Matter TRAILED for counsel to discuss date availability for an evidentiary hearing. Matter RECALLED. COURT ORDERED, status check SET on Chambers Calendar and directed counsel to contact Chambers regarding date availability. 9/15/17 STATUS CHECK (CHAMBERS);

09/28/2017 **Telephonic Conference** (2:30 PM) (Judicial Officer: Kishner, Joanna S.)
Matter Heard;
Journal Entry Details:
Court advised an order shortening time was received on a motion to withdraw which was set the same time as the evidentiary hearing. Further, it is not clear if counsel wants motion to be heard. Mr. Shapiro stated he wants evidentiary hearing to move forward as soon as possible. Mr. Thomson stated he would like motion to withdraw heard on October 3, 2017, advised he is not prepared to go forward with evidentiary hearing and believes it is not appropriate for counsel to go forward with evidentiary hearing. Court stated no rulings will be made today and will leave things as is for date and time already scheduled for. Mr. Thomson further stated as stated in letter, counsel responded to Mr. Shapiro's communication a week ago and was told by his office matter set for October 3, 2017. Counsel was not available to prepare for hearing due to travel schedule and Mr. Thomson stated he is concerned there was ex-parte communication with Department XXXI which has since been clarified in a letter. Further, Mr. Thomson stated he was under the impression date had not been set yet as he received no notice from Mr. Shapiro's office. Motion to withdraw was filed and noted there is 75 days until end of discovery. Additionally, there has been prior delays at no fault of counsel or client, received un-filed opposition, request evidentiary hearing be continued for client to obtain new counsel and request to have motion to withdraw heard on October 3, 2017. Court noted there is a properly noticed motion and properly noticed order shortening time. Further, there was no ex-parte communication, parties provided the Court with dates and the Court chose date available for the Court. Colloquy. COURT ORDERED, all matters STAND for October 3, 2017, at 1:30 p.m.;

10/03/2017 *CANCELED* **Calendar Call** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Vacated - per Stipulation and Order

10/03/2017 **Evidentiary Hearing** (1:00 PM) (Judicial Officer: Kishner, Joanna S.)
10/03/2017, 11/02/2017
Matter Continued;
Matter Heard;
Matter Continued;
Matter Heard;

10/03/2017 **Motion to Withdraw as Counsel** (1:00 PM) (Judicial Officer: Kishner, Joanna S.)

Motion to Withdraw as Attorney of Record on Order Shortening Time
Motion Granted;

10/03/2017 **Countermotion** (1:00 PM) (Judicial Officer: Kishner, Joanna S.)
10/03/2017, 11/02/2017
Defts' Countermotion for Sanctions and Award of Attorney Fees and Costs
Matter Continued;
Granted;
Matter Continued;
Granted;

10/03/2017 **All Pending Motions** (1:00 PM) (Judicial Officer: Kishner, Joanna S.)
Matter Heard;
Journal Entry Details:
Joseph Lee, Representative for Pltf. JOHN W. THOMSON, ESQ'S MOTION TO WITHDRAW AS ATTORNEY OF RECORD ON ORDER SHORTENING TIME... SHOW CAUSE HEARING...EVIDENTIARY HEARING...DEFT'S COUNTERMOTION FOR SANCTIONS AND AWARD OF ATTORNEY FEES AND COSTS Mr. Shapiro objected to motion to withdraw until after evidentiary hearing is held. Statement by Mr. Thomson. Colloquy. Mr. Thomson argued he has certified under oath that counsel cannot continue to represent Defts', reasons are clear, uncontroverted and requested to continue all pending matters on behalf of client. Further opposition by Mr. Shapiro. Additional argument by Mr. Thomson. Upon Court's inquiry, Deft. Dezfooli advised he has sought out counsel and requested additional time. Additional arguments by counsel. Court FINDS motion is appropriate, have proper affidavit, proper order shortening time, took into account counsel is sole practitioner and ORDERED, motion GRANTED. Deft. Dezfooli stated the only objection he has is time to get counsel and has no objection to motion to withdraw. Court stated motion was granted on individual and corporation and ORDERED, matter SET for status check on corporate counsel. Further, Court stated cannot conduct hearing as to the corporation but can hear as to individual, inclined to continue and inclined to keep trial dates. Mr. Shapiro argued there has been 19 violations of the Court's order and prepared to show violations. Further, rent due on the first, amount submitted was not correct, have not received appropriate rent for October, have checks that have been returned and noted a personal check was received in the amount of $9,233.46. Mr. Thomson stated per order, amount has been received every month since the order. Further, still disputing CAM charges as accounting has not been made and Deft. has paid. Court stated she is not inclined to give 60 days to obtain counsel but will give 30 days to obtain counsel. Upon further inquiry of the Court, Mr. Shapiro advised two witnesses, two and a half hours for Pltf. for evidentiary hearing. Mr. Thomson stated two witnesses and approximately 26 exhibits right now. FURTHER ORDERED, countermotion, order to show cause, status check regarding fees and costs as a result of Deft. not being prepared for scheduled hearing on October 3, 2017. Deft's counsel to prepare the order within 10 days pursuant to EDCR 7.21. Order must contain all new court dates and future court dates for all pending motions. 11/2/17 10:00 AM STATUS CHECK: PURSUANT TO EDCR 7.42 REGARDING CORPORATE COUNSEL...DEFT'S COUNTERMOTION FOR SANCTIONS AND AWARD OF ATTORNEY FEES AND COSTS...SHOW CAUSE HEARING...EVIDENTIARY HEARING;

10/09/2017 *CANCELED* **Bench Trial** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Vacated - per Stipulation and Order

11/02/2017 **Status Check** (10:00 AM) (Judicial Officer: Kishner, Joanna S.)
Status Check Pursuant to EDCR 7.42 Regarding Corporate Counsel
Matter Heard;

11/02/2017 **Status Check** (10:00 AM) (Judicial Officer: Kishner, Joanna S.)
Status Check: Fees & Costs as a Result of Deft. Not Being Prepared For Scheduled Hearing on October 3, 2017
Matter Heard;

11/02/2017 **All Pending Motions** (10:00 AM) (Judicial Officer: Kishner, Joanna S.)
Matter Heard;
Journal Entry Details:
Joseph Lee, a representative of EHH Venture LLC, also present. Court noted Mr. Fell

previously filed a Notice of Appearance on October 30, 2017; however, the Court has not received any substantive oppositions or pleadings. Mr. Fell confirmed, noting previous counsel filed an opposition to the Motion on calendar today. Upon Court's inquiry, Mr. Fell confirmed he is representing Best Flooring Ltd and Mr. Dezfooli. Testimony and exhibits presented (see worksheets). Parties rest. CONFERENCE AT BENCH. Closing arguments by Mr. Shapiro and Mr. Fell. COURT STATED ITS FINDINGS, and ORDERED, Writ of Restitution DENIED WITHOUT PREJUDICE. COURT FURTHER ORDERED, Sanctions INCREASED to $14,880.35; which shall be 3 times the ordered amount if paid by bond and will be the amount as ordered if paid by cash. Colloquy regarding outstanding check for rent for the month of November. COURT ORDERED, funds in the amount of $9,432.26 be subtracted from the ordered amount of $14,880.35; which shall be deposited by the close of business on November 27, 2017. Court noted confirmation that the funds were deposited shall be provided to the Court. Further colloquy regarding monthly rental amount. Mr. Fell confirmed his client will pay the amount of $9,468.26 in rental fees until trial commences. COURT SO NOTED. With respect to the global request for Attorney Fees, COURT FURTHER ORDERED, ruling DEFERRED, pending trial. Colloquy regarding fees for multiplying the proceedings. Further colloquy regarding future rent payments. Court DIRECTED Mr. Shapiro to prepare the order and circulate to defense counsel pursuant to EDCR 7.21. Court clarified submission of exhibits 31-33.;

11/08/2017 **Motion to Compel** (9:30 AM) (Judicial Officer: Bulla, Bonnie)
Plaintiff's Motion to Compel Discovery
Granted; Plaintiff's Motion to Compel Discovery
Journal Entry Details:
Tyre Gray, Esquire, for Best Flooring Ltd. Mr. Shapiro stated Mr. Gray agreed to produce documents by the 20th, but counsel cannot agree on Mr. Shapiro's request for $1,500 attorney fee award against the client (not new counsel). Colloquy re: Johnny Ribeiro. COMMISSIONER RECOMMENDED, motion is GRANTED within parameters; Commissioner RESERVED THE RIGHT to impose Rule 37 sanctions if there is a failure to supplement by 11-20-17 as agreed to by counsel; Status Check SET. Mr. Shapiro to prepare the Report and Recommendations, and Mr. Gray to approve as to form and content. A proper report must be timely submitted within 10 days of the hearing. Otherwise, counsel will pay a contribution. Counsel can contact Discovery to take the Status Check off calendar. 11-29-17 9:00 a.m. Status Check: Compliance / Attorney fees;

11/29/2017 *CANCELED* **Motion to Compel** (9:00 AM) (Judicial Officer: Bulla, Bonnie)
Vacated
Plaintiff's Second Motion to Compel Discovery

11/29/2017 *CANCELED* **Status Check: Compliance** (9:00 AM) (Judicial Officer: Bulla, Bonnie)
Vacated
Status Check: Compliance

01/04/2018 **Status Check: Compliance** (3:00 AM) (Judicial Officer: Bulla, Bonnie)
11-8-17 DCRR
Matter Continued;
complied
Journal Entry Details:
The 11-8-17 Report and Recommendation remains outstanding. Mr. Shapiro was given the responsibility to submit the Report and Recommendation from the 11-8-17 hearing. A proper report must be timely submitted within 10 days of the hearing. Otherwise, counsel will pay a sanction. COMMISSIONER RECOMMENDED, matter CONTINUED to an in chambers status check. CLERK'S NOTE: A copy of this minute order was placed in the attorney folder(s) of: James Shapiro - Smith & Shapiro;

01/09/2018 *CANCELED* **Status Check** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Vacated - per Stipulation and Order

02/15/2018 *CANCELED* **Pre Trial Conference** (10:15 AM) (Judicial Officer: Kishner, Joanna S.)
Vacated - per Stipulation and Order

03/13/2018 *CANCELED* **Calendar Call** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Vacated - per Stipulation and Order

03/19/2018	*CANCELED* **Bench Trial** (9:00 AM) (Judicial Officer: Kishner, Joanna S.) *Vacated - per Stipulation and Order*
04/12/2018	*CANCELED* **Status Check** (9:00 AM) (Judicial Officer: Kishner, Joanna S.) *Vacated - per Stipulation and Order*
06/28/2018	*CANCELED* **Pre Trial Conference** (10:15 AM) (Judicial Officer: Kishner, Joanna S.) *Vacated - per Stipulation and Order*
07/31/2018	*CANCELED* **Calendar Call** (9:00 AM) (Judicial Officer: Kishner, Joanna S.) *Vacated - per Stipulation and Order*
08/02/2018	**Status Check** (9:00 AM) (Judicial Officer: Kishner, Joanna S.) Matter Heard; Journal Entry Details: *Counsel announced ready and anticipate 3-5 days for Trial. The Court inquired if the parties would like to go to a settlement conference. Mr. Rawlins indicated no and Mr. Gray stated he would discuss the matter further with opposing counsel.;*
08/06/2018	*CANCELED* **Bench Trial** (9:00 AM) (Judicial Officer: Kishner, Joanna S.) *Vacated - per Stipulation and Order*
09/27/2018	**Motion to Withdraw as Counsel** (9:00 AM) (Judicial Officer: Kishner, Joanna S.) *Fennemore Craig, P.C.'s Motion to Withdraw as Attorney of Record on Order Shortening Time* Motion Granted; Journal Entry Details: *Following arguments by Mr. Fell, Mr. Blaylock and Mr. Dezfooli, the Court stated its FINDINGS and ORDERED Fennemore Craig, P.C.'s Motion to Withdraw as Attorney of Record GRANTED and matter SET for Status Check regarding Corporate Counsel for Best Flooring, Ltd. Mr. Fell to prepare the Order and including all upcoming dates in the Order within ten (10) days pursuant to EDCR 7.21. 10/18/18 10:15 AM STATUS CHECK: CORPORATE COUNSEL FOR BEST FLOORING, LTD.;*
10/18/2018	**Pre Trial Conference** (10:15 AM) (Judicial Officer: Kishner, Joanna S.) Trial Date Set;
10/18/2018	**Status Check: Confirmation of Counsel** (10:15 AM) (Judicial Officer: Kishner, Joanna S.) **10/18/2018, 11/27/2018** *Status Check: EDCR 7.42 Corp Counsel for Best Flooring Ltd.* Matter Continued; Matter Heard; Journal Entry Details: *Mr. Burnett indicated he recently filed a notice of appearance and he represents both Mr. Dezfooli and Best Flooring Ltd. Court reviewed upcoming dates, reminding counsel Trial dates remain and to comply with EDCR 2.67, 2.68 and 2.69.;* Matter Continued; Matter Heard;
10/18/2018	**All Pending Motions** (10:15 AM) (Judicial Officer: Kishner, Joanna S.) Matter Heard; Journal Entry Details: *PRE TRIAL CONFERENCE...STATUS CHECK: EDCR 7.42 CORP COUNSEL FOR BEST FLOORING LTD. Mr. Dezfooli stated he has contacted six office to try and secure counsel for Best Flooring and due to the impending trial date and their current schedules had has been unable to retain counsel and requested a trial continuance. The Court noted this was the fourth setting and inquired of plaintiff counsel's position. Mr. Shapiro indicated he would defer to the Court. Mr. Dezfooli further stated that he has retained settlement conference counsel to attempt to negotiate a settlement otherwise he would like to move forward with trial but that he needed*

more time to secure counsel for Best Flooring. Mr. Shapiro stated he would have no objection to continuing to the next or February 2019 Stack, but that he would like it to be a firm setting. The Court noted Best Flooring is non-compliant with EDCR 7.42, however based on the agreement of the parties, the matter will be set for a fifth trial setting. Accordingly, COURT ORDERED, Trial Dates VACATED and RESET; the Court is not opening up any past deadlines and only continuing trial to allow Mr. Dezfooli to retain corporate counsel for Best Flooring, Ltd. COURT FURTHER ORDERED, Status Check for Corporate Counsel CONTINUED to November 27, 2018 at 9:00 a.m. as requested by Mr. Dezfooli, noting that the Court has now allowed 60 days to retain counsel and if Corporate Counsel is not retained by the next hearing date, the Court will be considering sanctions, up to and including Striking Defendant Best Flooring, Ltd. answer. At the request of Mr. Shapiro, COURT ORDERED Plaintiff's Motion in Limine previously set for hearing on October 30, 2018, STANDS. 10/30/18 9:00 AM PLAINTIFF'S MOTION IN LIMINE 11/27/18 9:00 AM STATUS CHECK: EDCR 7.42 CORP COUNSEL FOR BEST FLOORING LTD. 1/10/19 10:15 AM PRE TRIAL CONFERENCE 2/5/19 9:00 AM CALENDAR CALL 2/11/19 9:00 AM BENCH TRIAL (5 WEEK STACK) CLERK'S NOTE: Minutes corrected to reflect Plaintiff's Motion in Limine hearing would remain as scheduled for hearing on October 30, 2018. (tmj:10/29/18);

10/30/2018 **Motion in Limine** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Plaintiff's Motion in Limine
Motion Granted;
Journal Entry Details:
The Court noted it was inclined to grant Plaintiff's Motion in Limine pursuant to EDCR 2.20 and on the merits as there was no opposition and previously stated it would be granted as unopposed. Mr. Shapiro stated Mr. Dezfooli cannot represent a corporate entity. Mr. Dezfooli stated he needed time to retain corporate counsel and was unaware that he could oppose personally. Court FINDS no good cause to have not opposed and will allow oral argument. Mr. Dezfooli stated he opposed the motion and indicated his new counsel is Zachary Takos. Mr. Shapiro requested that motion be granted and the case move forward. Taking into account defendant's oral statement in opposition, COURT ORDERED, Plaintiff's Motion In Limine GRANTED pursuan to EDCR 2.20, both individually and on behalf of Best Flooring, Ltd. Mr. Shapiro to prepare the Order, circulating to opposing counsel and provide it back to the Court in accordance with EDCR 7.21.;

11/13/2018 *CANCELED* **Calendar Call** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Vacated - per Judge

11/19/2018 *CANCELED* **Bench Trial** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Vacated - per Judge

01/10/2019 **Pre Trial Conference** (10:15 AM) (Judicial Officer: Kishner, Joanna S.)
Trial Date Set;
Journal Entry Details:
Defense counsel not present when case was called. The Court confirmed that Chambers had received notification from Mr. Burnett's office that he was enroute and matter was TRAILED. MATTER RECALLED. Mr. Shapiro anticipated 3-4 days for trial and requested February 19, 2019 for trial. Mr. Burnett indicated that co-counsel teaches on Mondays and Tuesdays. Colloquy regarding trial setting. At counsel's request, COURT ORDERED, Trial SET for for February 20 - 22, 2019 as No. 2 setting; Calendar Call RESET; and Joint Pretrial Memorandum DUE by 4:00 p.m. February 5, 2019. 2/12/19 9:00 AM CALENDAR CALL 2/20/19 10:00 AM BENCH TRIAL;

02/12/2019 **Calendar Call** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Matter Heard;

02/12/2019 **Show Cause Hearing** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Matter Heard;

02/12/2019 **All Pending Motions** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Matter Heard;
Journal Entry Details:

SHOW CAUSE HEARING...CALENDAR CALL The Court noted there was no opposition filed

regarding the Order to Show Cause. Mr. Burnett indicated payment was made last Friday. Mr. Shapiro indicated only the rent payment was made, no late fees or interest and defendant was required to pay all amounts due, has been given every opportunity, has done nothing, and requested defendant's answer be stricken. Mr. Burnett acknowledged there was no dispute that only the rent was paid on February 8, 2019. The Court then reviewed plaintiff's compliance and defendant's non-compliance with EDCR 2.67, 2.68 and 2.69. COURT ORDERED Defendant's Answer and Counter-Claim STRICKEN and Trial Dates VACATED. Mr. Shapiro to prepare the Order, circulating to opposing counsel and provide it back to the Court in accordance with EDCR 7.21. Mr. Shapiro indicated he would Notice a default judgment hearing in the ordinary course.;

02/20/2019 *CANCELED* **Bench Trial** (10:00 AM) (Judicial Officer: Kishner, Joanna S.)
Vacated - per Judge

04/11/2019 **Prove Up/Default** (10:00 AM) (Judicial Officer: Kishner, Joanna S.)
Notice of Hearing Regarding Prove Up Default Judgment (Best Floors LTD dba Best Buy Flooring)
Pursuant to faxed request from counsel
Matter Continued; Notice of Hearing Regarding Prove Up Default Judgment (Best Floors LTD dba Best Buy Flooring)
Journal Entry Details:
Mr. Shaprio indicated he has a copy of the exhibits in a binder for the Court to review. Upon Court's inquiry, Mr. Whitehead confirmed he would like to participate in the hearing today. Mr. Shapiro argued to his knowledge Mr. Whitehead does not have a right to participate once a default has been entered against his client. COURT INFORMED parties a determination needs to be made whether Mr. Whitehead can participate today, adding there has been no request, and nothing has been noticed to the Court prior to this hearing. Upon Courts' inquiry, parties confirm there is no agreement with Mr. Whitehead participating today. Mr. Shaprio informed the Court he was not aware Mr. Whitehead was going to appear in Court today. Colloquy regarding Foster v. Dingwall. Mr. Whitehead requested to cross examine the witness, adding parities stipulated to moving the matter to today. Mr. Shapiro stated his concern with Mr. Whitehead cross examining the witness is the matter would be turned into a trial and not a prove up for default. Mr. Shapiro requested the Defense attorney be required to identify the nature and the scope of their involvement, and he would like an opportunity to provide written briefing to address the issue, and requested the Court rule on the matter. Mr. Whitehead stated no objection to the briefing, however requested it be short and expedited. Colloquy regarding scheduling of continued hearing. COURT STATED pursuant to conversations, parties will let the Court know when the matter can be continued.;

05/16/2019 **Motion for Relief** (9:30 AM) (Judicial Officer: Kishner, Joanna S.)
Events: 04/11/2019 Notice of Hearing
Notice of Hearing on Motion for Relief Under NRCP Rule 60B
Denied;

05/16/2019 **Request** (9:30 AM) (Judicial Officer: Kishner, Joanna S.)
Defendants' request to participate in Default Judgment hearing
Granted in Part;

05/16/2019 **All Pending Motions** (9:30 AM) (Judicial Officer: Kishner, Joanna S.)
All Pending Motions (5/16/2019)
Matter Heard;
Journal Entry Details:
DEFENDANTS' MOTION FOR RELIEF UNDER NRCP RULE 60B...DEFENDANTS' REQUEST TO PARTICIPATE IN DEFAULT JUDGMENT HEARING Arguments by counsel. COURT ORDERED, Motion for relief DENIED; request to participate in default judgment hearing GRANTED IN PART, as Defendant will be permitted to cross examine the witness for default proceedings. Mr. Shapiro to prepare the order and run it by opposing counsel for approval of form and content.;

07/11/2019 **Bench Trial** (1:00 PM) (Judicial Officer: Kishner, Joanna S.)
Judgment for the Plaintiff;
Journal Entry Details:

This prove up hearing proceeded as a bench trial. Testimony and Exhibits presented (See Worksheets.). Both sides rested. Closing arguments by counsel. COURT ORDERED, Plaintiff's Application for Default Judgment GRANTED IN PART and DENIED IN PART; Court GRANTS damages in the amount of $354,646.89, minus the HVAC of $4,600.00, attorney fees in the amount of $194,733.00 will be awarded, and costs in the amount of $20,359.39 will also be awarded. COURT ADDITIONALLY ORDERED, the bond posted by Plaintiff in the amount of $1,000.00 is appropriate to be released to Plaintiff, this does not offset $354,646.89, the bond in the amount of $20,238.35 will be released to Plaintiff, and this does offset the $354,646.89. At request of counsel, COURT FURTHER ORDERED, the Court will reserve ruling regarding treble damages, and counsel may submit supplemental briefing on this, including courtesy copies by no later than August 2, 2019 by 4:00 P.M. Mr. Shapiro to submit the proposed judgment; opposing counsel to approve form and content.;

09/04/2019

Minute Order (3:00 AM) (Judicial Officer: Kishner, Joanna S.)

Minute Order - No Hearing Held;

Journal Entry Details:

On March 15, 2019, an Application for Default Judgment was filed by Plaintiff EHH Venture LLC. On April 11, 2019, an Opposition was filed by Defendants' Best Floors Ltd. and Meelad Dezfooli. The matter came on for prove-up hearing on Department XXXI's July 11, 2019 Motion Calendar. The Court allowed Defendants to cross examine Plaintiff's witnesses and make arguments relating thereto. The Court granted in part and denied in part the Application for Default Judgment. The Court reserved ruling regarding treble damages and allowed the parties to submit supplemental briefing on this issue, including a courtesy copy to the Court by August 2, 2019 at 4:00 p.m. On August 1, 2019, the Default Judgment Order was filed by Plaintiff with Notice of Entry. On August 2, 2019 at 3:08 p.m., a Supplemental Brief Regarding Treble Damages was filed by Plaintiff. After thorough review of the papers and pleadings in this matter the Court finds as follows: Pursuant to NRS 40.2512 and NRS 40.360, the Court DENIES the request for treble damages. NRS 40.2512 sets forth the legal standard for unlawful detainer after default in payment of rents, and states: A tenant of real property or a mobile home for a term less than life is guilty of an unlawful detainer when the tenant continues in possession, in person or by subtenant, after default in the payment of any rent and after a notice in writing, requiring in the alternative the payment of the rent or the surrender of the detained premises, remains uncomplied with for a period of 5 days, or in the case of a mobile home lot, 10 days after service thereof. The notice may be served at any time after the rent becomes due. NRS 40.360, which explains the judgment to be entered for unlawful detainer, states in pertinent part: 1. Judgment. If, upon the trial, the verdict of the jury, or, if the case be tried without a jury, the finding of the court, be in favor of the plaintiff and against the defendant, judgment shall be entered for the restitution of the premises; and, if the proceeding be for unlawful detainer after neglect or failure to perform any condition or covenant of the lease or agreement under which the property is held, or after default in the payment of rent, the judgment shall also declare the forfeiture of such lease or agreement. 2. Damages. The jury or the court, if the proceeding be tried without a jury, shall also assess the damages occasioned to the plaintiff by any forcible entry, or by any forcible or unlawful detainer, and any amount found due the plaintiff by reason of waste of the premises by the defendant during the tenancy, alleged in the complaint and proved on the trial, and find the amount of any rent due, if the alleged unlawful detainer be after default in the payment of rent; and the judgment shall be rendered against the defendant guilty of the forcible entry, or forcible or unlawful detainer, for the rent and for three times the amount of the damages thus assessed. (emphasis added) . In this case, Best Floors was delinquent in paying CAM charges starting in Jun 2016 (two months after the Leases were signed) and was likewise delinquent in paying rent starting in September 2016. The case was about delinquent rent rather than damage to the premises or a wasting of the premises as set forth in the statute. Thus, the Court does not find that the intent or the plain language of the statute would be met by the award of treble damages in the instant case. While the Court is appreciative of the delay in rent payments, the delay in the recovery of those rent payments and the time it took to have the matter heard due to the actions of defendants; Plaintiff received damages consistent with the terms of the contract between the parties and in accordance with applicable law. There was no evidence presented to the Court that defendant damaged the premises, did a forcible entry, or laid waste to the premises or otherwise engaged in conduct that would merit treble damages. Thus, the Court DENIES the request for treble damages. This Decision sets forth the Court's intended disposition on the subject but anticipates further Order of the Court to make such disposition effective as an Order or Judgment. Such Order should set forth a synopsis of the supporting reasons proffered to the Court in briefing. Counsel is directed to prepare the Order, and submit to Chambers for consideration in accordance with EDCR 7.21. CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk Susan Botzenhart, to all parties registered for Odyssey File & Serve. sb;

02/27/2020 **Motion to Compel** (9:00 AM) (Judicial Officer: Truman, Erin)
Notice of Hearing of Judgment Creditor's Motion to Compel and for Sanctions
Granted; Notice of Hearing of Judgment Creditor's Motion to Compel and for Sanctions
Journal Entry Details:
Motion having been duly filed and served, no opposition having been filed, pursuant to EDCR 2.20(e) and for good cause shown, COMMISSIONER RECOMMENDED, motion GRANTED; objections WAIVED except for privileges, and the Judgment Debtor must respond to all served discovery within 30 days from today, by 3-27-2020; Commissioner Will Not Grant Attorney fees today. Commissioner RESERVED RULING on the Motion for Sanctions, and for Attorney fees; Status Check SET for Commissioner to determine if Attorney fees are warranted. Mr. Blaylock to prepare the Report and Recommendations, and opposing counsel to approve as to form and content. A proper report must be timely submitted within 14 days of the hearing. Otherwise, counsel will pay a contribution. 4-3-2020 9:30 a.m. Status Check: Compliance / Production of Documents / Attorney fees CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Jennifer Lott, to all registered parties for Odyssey File & Serve. jl;

03/26/2020 *CANCELED* **Status Check: Compliance** (3:00 AM) (Judicial Officer: Truman, Erin)
Vacated
Status Check: Compliance / 2-27-2020 DCRR

04/03/2020 **Status Check** (9:30 AM) (Judicial Officer: Truman, Erin)
Status Check: Compliance / Production of documents / Attorney fees
Matter Heard; Status Check: Compliance / Production of documents / Attorney fees
Journal Entry Details:
Mr. Shapiro stated there was no compliance, he has been in contact with the Judgment Creditor's counsel, and the client is not speaking with his attorney. Colloquy. COMMISSIONER RECOMMENDED, Motion for Sanctions (Attorney fees) is DENIED. No further Status Check set. The Minute Order will suffice. CLERK S NOTE: This Minute Order was electronically served by Courtroom Clerk, Jennifer Lott, to all registered parties for Odyssey File & Serve. jl;

04/17/2020 **Motion to Withdraw as Counsel** (3:00 AM) (Judicial Officer: Kishner, Joanna S.)
Defendant's Motion To Withdraw As Counsel Of Record
Minute Order - No Hearing Held;
Journal Entry Details:
On February 28, 2020, a Motion to Withdraw as Counsel was filed by counsel for Defendant Best Floors Ltd. On March 18, 2020, an Opposition was filed by Plaintiff The EHH Venture, LLC. The matter was placed on Department XXXI's Chambers Calendar for April 17, 2020. The Court is concerned that the "Motion" appears to be filed utilizing opposing counsel s letterhead and contains opposing counsel s name and contact information on the first page as well as the signature page. It is unclear if defense counsel had authorization to use Plaintiff s counsel letterhead but as presented the Motion does not comply with EDCR 7.20. In addition, the Motion does not include the contact information for Best Floors Ltd. as required by EDCR 7.40 and has several other procedural challenges as set forth in Plaintiff s Opposition. Moreover, given the pending outstanding Discovery Commissioner s Report and Recommendations Re: Judgment Creditor s Motion to Compel and for Sanctions, which was electronically signed by the Court, there are additional issues that need to be set forth in the Motion. Additionally, pursuant to EDCR 7.42, a corporate entity may not proceed in proper person, which is not stated in the Motion. Further, it is unclear whether the Motion was served on all parties. It is also unclear whether counsel represents both Defendants Dezfooli and Best Floor Ltd. and seeks to withdraw on behalf of both or only Best Floors. Finally, this matter was set for the Court s Chambers Calendar but the motion also sets forth that a hearing is requested. Given the numerous procedural challenges, the Court finds it appropriate to Deny the Motion for inter alia the reasons set forth herein. A hearing would not alleviate the procedural issues or the letterhead issue and thus a determination in Chambers is appropriate. Accordingly, the Court Orders that the Motion to Withdraw is DENIED WITHOUT PREJUDICE. This Decision sets forth the Court s intended disposition on the subject but anticipates further Order of the Court to make such disposition effective as an Order or Judgment. Such Order should set forth a synopsis of the supporting reasons proffered to the Court in briefing. CLERK S NOTE: A copy of this minute order was distributed via the E-Service Master List. /lg 4-17-20;

05/14/2020 *CANCELED* **Show Cause Hearing** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Vacated - Duplicate Entry

05/14/2020 **Show Cause Hearing** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Matter Heard;
Journal Entry Details:
Mr. Shapiro argued in support of motion regarding non-compliance. Court finds there was notice of this hearing. Court stated its findings and ORDERED, Motion GRANTED. COURT FURTHER ORDERED, contempt hearing SET. Mr. Shapiro to prepare Order in accordance with EDCR 7.21. 6/2/20 9:00 AM CONTEMPT HEARING;

06/02/2020 **Contempt Hearing** (10:00 AM) (Judicial Officer: Kishner, Joanna S.)
Bench Warrant Issued; Bond Set $500.00
Journal Entry Details:
Court noted there were no appearances on behalf of Mr. Dezfooli or Best Floors. Court advised there was a Motion to Withdraw filed by counsel and it wrote a memo regarding its concerns/issues. Subsequently, the Motion was denied without prejudice. And then a second Motion to Withdraw as Counsel was filed and set for June 10th, noting there was no request to hear it on an order shortening time. Court advised it did not receive any notification asking the Motion to Withdraw to be advanced. Upon Court's inquiry, Mr. Shapiro stated he did not receive any notification either. Mr. Shapiro stated in addition to service on Defendant's counsel, he took the new order that had today's date and mailed it to Mr. Dezfooli's home address, as well as mailed it to the registered agent of Best Buy Flooring. Mr. Shapiro argued legal basis for contempt pursuant to NRS 22.010 and requested the Court find Defendant in contempt and issue a bench warrant. COURT FINDS Defendants violated the Court's February Order and they have been noticed of all subsequent Orders to Show Cause and failed to appear. Court finds the standards in NRS 22.010 and NRS 22.100 have been met. COURT ORDERED Bench Warrant to ISSUE against Meelad Dezfooli and BOND SET in the amount of $500.00. Sanctions DEFERRED until after it is determined whether Defendants complied with the Bench Warrant. Mr. Shapiro to prepare Order. CLERK'S NOTE: Minute Order amended to setting $500.00 Bond as to Meelad Dezfooli only, and not Jose Bolanos. /lg 6-10-20;

06/10/2020 **Motion to Withdraw as Counsel** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Motion to Withdraw As Counsel of Record
Motion Granted; Motion to Withdraw As Counsel of Record
Journal Entry Details:
Court noted it signed the bench warrant and contempt order because of a pattern of conduct on behalf of Defendants. Court cited case law. Upon Court s inquiry, Mr. Whitehead stated he provided notice to his client at his last known address. Mr. Shapiro deferred the matter to the Court. Court noted the only opposition was a procedural opposition. Based on representations, COURT ORDERED, Motion to Withdraw GRANTED. Mr. Whitehead to prepare Order in accordance with EDCR 7.21. COURT FURTHER ORDERED, matter SET for status check. 7/9/20 9:00 AM STATUS CHECK: CORPORATE COUNSEL ;

07/09/2020 *CANCELED* **Status Check: Confirmation of Counsel** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Vacated - Case Closed
Status Check: Corporate Counsel

12/08/2020 **Motion** (9:00 AM) (Judicial Officer: Kishner, Joanna S.)
Motion to Increase Bail Amount in Bench Warrant for Judgment Debtor Meelad Dezfooli
Granted;
Journal Entry Details:
Mr. Shapiro argued the police would not execute on a $500.00 bond and requested an increase to $50,000.00 for Defendant's non compliance with the judicial process under NRS 22.100. Opposition by Mr. Dezfooli. Argument that he did not have money to a pay. Court does not find any evidence of hardship; no payment had been made on the Judgment; there has been no attempt to comply; it was becoming a pattern; and under the totality of the circumstances. COURT ORDERED, motion GRANTED; Bail INCREASED to $10,000.00.;

03/02/2021	**Bench Warrant Return** (9:00 AM) (Judicial Officer: Kishner, Joanna S.) Hearing Set; Journal Entry Details: *Ms. Hinds advised she spoke with Mr. Dezfooli and he indicated he would be able to comply with the outstanding request and would need time to turn over to Plaintiff. Mr. Shapiro noted that the Discovery request dates were from 2019 and would need to be updated. He could e-serve the Discovery request with the updated dates by the end of the day. Then Defendant would be allowed two weeks to provide a response, thereafter, a status check date was requested. Ms. Hinds noted she had not worked with Defendant previously and would require at least three weeks or thirty days to respond. Upon Court's request, Ms. Hinds advised Defendant indicated he posted the bond through a bonding company. Mr. Shapiro requested that if any money was to be returned to Defendant that it should be turned over to Plaintiff and applied to the judgment. COURT ORDERED, Mr. Shapiro's request GRANTED. COURT FURTHER ORDERED, the Bench Warrant portion CLOSED. COURT ADDITIONALLY ORDERED, Discovery response due twenty-one (21) days from the date Mr. Shapiro e-serves. COURT ORDERED, Status Check SET and NOTED if the parties wished to vacate the hearing then they should submit a joint letter or a stipulation no less than twenty-four hours prior to the scheduled hearing. 03/30/21 9:00 AM STATUS CHECK;*
04/06/2021	*CANCELED* **Status Check** (9:00 AM) (Judicial Officer: Kishner, Joanna S.) *Vacated - Case Closed*
09/19/2023	**Motion** (9:00 AM) (Judicial Officer: Kishner, Joanna S.) *Motion to Release Bond* Denied;
09/19/2023	**Opposition and Countermotion** (9:00 AM) (Judicial Officer: Kishner, Joanna S.) *Opposition to Motion to Release Bond and Countermotion for Release of Bond to Plaintiff Pursuant to this Court's March 5, 2021 Order* Granted;
09/19/2023	**All Pending Motions** (9:00 AM) (Judicial Officer: Kishner, Joanna S.) Matter Heard; Journal Entry Details: *MOTION TO RELEASE BOND... OPPOSITION TO MOTION TO RELEASE BOND AND COUNTERMOTION FOR RELEASE OF BOND TO PLAINTIFF PURSUANT TO THIS COURT'S MARCH 5, 2021 ORDER Upon Court's inquiry, Ms. Hinds provided a brief background history of the case and argued Mr. Manouchehr Dezfooli posted the bond in Justice Court on behalf of his son, the Defendant. Ms. Hinds argued the Judgment had been satisfied according to the Court's records and there was nothing specific in the Contempt Order which allowed a Judgment Creditor to take money posted by a third party. Colloquy regarding Partial Satisfaction of Judgment (Doc 167). Mr. Shapiro stated the Order was issued after Defendant was found to be numerous times in contempt. Mr. Shapiro provided a brief background history of the case and referenced the March 5, 2021 Order attached as an exhibit to his Countermotion. Mr. Shapiro argued Mr. Manouchehr Dezfooli only provided evidence he posted the bond, not that he paid it, and regardless, the Order required the bond be turned over to Plaintiff and applied to the outstanding judgment. Mr. Shapiro stated the outstanding judgment had not been satisfied as evidenced by the partial satisfaction of judgment. Furthermore, Plaintiff agreed to accept less than the full judgment from Meelad Dezfooli / Best Floors, LTD. and the bond should be turned over to Plaintiff. Counsel confirmed in 2021 it was not represented to the Court the bond was posted by someone other than Defendant. Court stated its Findings and ORDERED Defendant's Motion to Release Bond DENIED and Plaintiff's Countermotion for Release of Bond to Plaintiff Pursuant to this Court's March 5, 2021 Order GRANTED. COURT DIRECTED Mr. Shapiro to prepare the Order with detailed Findings of Fact and Conclusions of Law, circulate to opposing counsel, submit to the Court pursuant to EDCR 7.21 and the current Administrative Orders and cite to and attach the March 5, 2021 Order.;*

DATE	FINANCIAL INFORMATION	
	Defendant Dezfooli, Meelad M	
	Total Charges	494.00
	Total Payments and Credits	494.00
	Balance Due as of 11/1/2023	**0.00**

Plaintiff EHH Venture LLC	
Total Charges	452.00
Total Payments and Credits	452.00
Balance Due as of 11/1/2023	**0.00**
Defendant Bolanos, Jose	
Cash Bail -- Trust Balance as of 11/1/2023	**0.00**
Defendant Bolanos, Jose	
Cash Bail -- Trust Balance as of 11/1/2023	**0.00**
Defendant Dezfooli, Meelad M	
Cash Bail -- Trust Balance as of 11/1/2023	**0.00**
Plaintiff EHH Venture LLC	
Miscellaneous Fee Code Balance as of 11/1/2023	**0.00**

A- 16- 746034- C

DISTRICT COURT CIVIL COVER SHEET

XXXI

County, Nevada

Case No. .....
(Assigned by Clerk's Office)

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

Plaintiff(s) (name/address/phone):	Defendant(s) (name/address/phone):
THE EHH VENTURE LLC	MEELAD DEZFOOLI, an individual; JOSE BOLANOS,
	an individual; and DOES 1-10, and ROE ENTITES 1-10, inclusive
Attorney (name/address/phone):	Attorney (name/address/phone):
James E. Shapiro, Esq. and Andrew S. Blaylock Esq.	
Smith & Shapiro, PLLC	
2520 St. Rose Parkway, Suite 220	
Henderson, NV 89074	

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.

11/02/16
Date

Signature of initiating party or representative

See other side for family-related case filings.

Electronically Filed
09/29/2023 9:26 AM
CLERK OF THE COURT

ORDR
James E. Shapiro, Esq.
Nevada Bar No. 7907
Smith & Shapiro, PLLC
3333 E. Serene Ave., Suite #130
Henderson, NV 89074
(702) 318-5033
Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

THE EHH VENTURE LLC, a Nevada limited liability company,
Plaintiff,
vs.
MEELAD DEZFOOLI, an individual; JOSE BOLANOS,an individual; and DOES 1-10, and ROE ENTITIES 1-10, inclusive,
Defendants.

THE EHH VENTURE LLC, a Nevada limited liability company,
Plaintiff,
vs.
BEST FLOORS LTD dba BEST BUY FLOORING, a Nevada limited liability company; and DOES 1-10, and ROE ENTITIES 1-10, inclusive
Defendants.

BEST FLOORS LTD dba BEST BUY FLOORING, a Nevada limited liability company,
Counterclaimant,
vs.
THE EHH VENTURE LLC, a Nevada limited liability company; and DOES 1-10, and ROE ENTITIES 1-10, inclusive
Counterdefendants.

Case No. **A-16-746034-C**
Dept: XXXI

Consolidated with
A-16-748846-C

ORDER:

(1) DENYING MANOUCHER DEZFOOLI'S MOTION TO RELEASE BOND;

AND

(2) GRANTING THE EHH VENTURE, LLC'S COUNTERMOTION FOR RELEASE OF BOND TO PLAINTIFF PURSUANT TO THIS COURT'S MARCH 5, 2021 ORDER

Date: September 19, 2020
Time: 9:00 a.m.

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SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

SMITH & SHAPIRO, PLLC
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ORDER: (1) DENYING MANOUCHER DEZFOOLI'S MOTION TO RELEASE BOND; AND (2) GRANTING THE EHH VENTURE, LLC'S COUNTERMOTION FOR RELEASE OF BOND TO PLAINTIFF PURSUANT TO THIS COURT'S MARCH 5, 2021 ORDER

This matter having come on for hearing on September 19, 2023, on MANOUCHER DEZFOOLI'S MOTION TO RELEASE BOND [Doc ID# 169] (the "***Motion***"), and on THE EHH VENTURE, LLC'S COUNTERMOTION FOR RELEASE OF BOND TO PLAINTIFF PURSUANT TO THIS COURT'S MARCH 5, 2021 ORDER [Doc ID# 172] (the "***Countermotion***"); MANOUCHER DEZFOOLI ("***Mr. Dezfooli***"[1]) having appeared by and through his attorney of record, Cristina Hinds, Esq., of HINDS INJURY LAW LAS VEGAS, LLC; THE EHH VENTURE, LLC ("***EHH***") having appeared by and through its attorney of record, James E. Shapiro, Esq., of SMITH & SHAPIRO, PLLC; the Court having reviewed and considered the pleadings and papers on file herein [Doc ID#'s 161, 169, 171, 172, 174, & 177] and the arguments of counsel; the Court being fully advised in the premises and good cause appearing therefore, the Court finds, concludes and orders as follows:

1. On February 23, 2021, a Ten Thousand Dollars ($10,000.00) bond (the "***Bond***") was posted on behalf of Defendant / Judgment Debtor Meelad Dezfooli in conjunction with the bench warrant previously issued by this Court [Doc ID#'s 138, & 149]. A copy of the CASH BOND ACCEPTANCE NOTICE is attached hereto as ***Exhibit "A"***.

2. On March 2, 2021, this Court held on a hearing on the Bench Warrant Return.

3. All representations to the Court at the March 2, 2021 hearing were that Defendant Meelad Dezfooli was the one who had posted the Bond at issue.[2] There was no mention or representation that Mr. Dezfooli was the one who had posted the Bond on behalf of Defendant.

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[1] Not to be confused with the Defendant Meelad Dezfooli, although Mr. Dezfooli is Defendant Dezfooli's father.

[2] According to the Court's minutes from that hearing: "Defendant indicated ***he*** posted the bond through a bonding company." (emphasis added).

4. Three days later, on March 5, 2021, this Court entered an order (the "***March 5, 2021 Order***") in which this Court specifically ruled that: "the Bond and/or all monies relating to the Bond that would have otherwise been returned to Dezfooli are ordered to be turned over to EHH and applied against the outstanding judgment." A copy of the Court's March 5, 2021 order is attached hereto as ***Exhibit "B"*** and incorporated herein by this reference.

5. The plain reading of the March 5, 2021 Order demonstrates that the Bond, which Defendant Dezfooli represented had been posted by himself, was previously ordered to be turned over to EHH and applied against the outstanding judgment.

6. More than two years passed after entry of the March 5, 2021 Order before Mr. Dezfooli asserted that he, Mr. Dezfooli, was the one who had posted the Bond.

7. The time period to modify or amend the March 5, 2021 Order has long since passed, and the Court has not been provided with good cause to reconsider its prior ruling.

8. The March 5, 2021 Order is and remains a valid and enforceable order, which has not been modified, amended nor revoked.

NOW THEREFORE:

9. IT IS HEREBY ORDERED that MANOUCHER DEZFOOLI'S MOTION TO RELEASE BOND [Doc ID# 169] is hereby DENIED.

10. IT IS FURTHER ORDERED that THE EHH VENTURE, LLC'S COUNTERMOTION FOR RELEASE OF BOND TO PLAINTIFF PURSUANT TO THIS COURT'S MARCH 5, 2021 ORDER [Doc ID# 172] is hereby GRANTED.

11. IT IS FURTHER ORDERED that Clerk of the Court is hereby ordered and directed to return and deliver the Bond to The EHH Venture, LLC, by issuing a check in the amount of Ten Thousand Dollars ($10,000.00) made payable to "Smith & Shapiro, PLLC" and delivering the same to Smith & Shapiro, PLLC, attention James E. Shapiro, Esq., 3333 E. Serene Ave., Suite 130, Henderson, NV 89074, to be deposited into Smith & Shapiro, PLLC's trust account for the benefit of

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SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

The EHH Venture, LLC, to be released to The EHH Venture, LLC (subject to any applicable fee agreement) and applied against the outstanding judgment.

IT IS SO ORDERED.

Dated: _____

Dated this 29th day of September, 2023

DISTRICT COURT JUDGE

F30 614 E7EE 984C
Joanna S. Kishner
District Court Judge

Prepared and Submitted By:

SMITH & SHAPIRO, PLLC

/s/ James E. Shapiro
James E. Shapiro, Esq.
Nevada Bar No. 7907
3333 E. Serene Ave., Suite 130
Henderson, Nevada 89074
Attorneys for Plaintiff

Approved as to Form:

HINDS INJURY LAW LAS VEGAS, LLC

Declined to sign
Cristina Hinds, Esq.
Nevada Bar No. 7014
600 South Eighth Street
Las Vegas, NV 89101
Attorneys for Manoucher Dezxfooli

SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

Exhibit “A”

Exhibit “A”

LV JUSTICE CT CRIMINAL
200 LEWIS 2ND FLOOR
LAS VEGAS, NV 89155

02/23/2021 15:33:16

CREDIT CARD

MC SALE

Card #	XXXXXXXXXXX7317
Chip Card:	MASTERCARD
AID:	A0000000041010
SEQ #:	3
Batch #:	1807
INVOICE	4
Approval Code:	094992
Entry Method:	Chip Read
Mode:	Issuer

SALE AMOUNT $10000.00

CUSTOMER COPY

Las Vegas Justice Court

Regional Justice Center

200 Lewis Avenue 2nd Fl • Box 552511 • Las Vegas NV 89155-2511

(702) 671-3116

http://www.clarkcountycourts.us/lvjc/index.html

CASH BOND ACCEPTANCE NOTICE

NOTICE TO APPEAR OFFICIAL RECEIPT

2/23/2021

A-16-746034-C

DEZFOOLI, MEELAD

Scope ID: **2869532**

Charges:	Contempt of court [52909]
Bail Amount:	$10,000.00
Cash Bond Payor:	MANOUCHEHR DEZFOOLO

YOU ARE TO APPEAR ON:

03/29/2021 at 9:00 am in District Court 702-671-4528

Failure to appear could result in a bench warrant being issued for your arrest.

Appropriate Courtroom attire required
No shorts, halter tops or tank tops, shoes are required.
(NO FOOD OR DRINK PERMITTED)

Exhibit “B”

Exhibit “B”

Electronically Filed
3/5/2021 1:26 PM
Steven D. Grierson
CLERK OF THE COURT

ORDR
James E. Shapiro, Esq.
Nevada Bar No. 7907
Andrew S. Blaylock, Esq.
Nevada Bar No. 13666
SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite #130
Henderson, NV 89074
(702) 318-5033
Attorneys for THE EHH VENTURE, LLC

DISTRICT COURT

CLARK COUNTY, NEVADA

THE EHH VENTURE LLC, a Nevada limited liability company,
Plaintiff,
vs.
MEELAD DEZFOOLI, an individual; JOSE BOLANOS, an individual; and DOES 1-10, and ROE ENTITIES 1-10, inclusive,
Defendants.

Case No. **A-16-746034-C**
Dept: XXXI

Consolidated with
A-16-748846-C

THE EHH VENTURE LLC, a Nevada limited liability company,
Plaintiff,
vs.
BEST FLOORS LTD dba BEST BUY FLOORING, a Nevada limited liability company; and DOES 1-10, and ROE ENTITIES 1-10, inclusive
Defendants.

BEST FLOORS LTD dba BEST BUY FLOORING, a Nevada limited liability company,
Counterclaimant,
vs.
THE EHH VENTURE LLC, a Nevada limited liability company; and DOES 1-10, and ROE ENTITIES 1-10, inclusive
Counterdefendants.

ORDER REGARDING BENCH WARRANT RETURN FOR JUDGMENT DEBTOR MEELAD DEZFOOLI

\ \ \

SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

Case Number: A-16-746034-C

ORDER REGARDING BENCH WARRANT RETURN FOR JUDGMENT DEBTOR MEELAD DEZFOOLI

THIS MATTER having come before the Court on the bench warrant return of Meelad Dezfooli ("***Dezfooli***"), Judgment Debtor Dezfooli having appeared by and through his attorneys of record, HINDS INJURY LAW LAS VEGAS, Judgment Creditor THE EHH VENTURE LLC, a Nevada limited liability company ("***EHH***" or "***Judgment Creditor***") having appeared by and through its attorneys of record, SMITH & SHAPIRO, PLLC, the Court being fully advised in the premises, and good cause appearing therefore:

1. On June 9, 2020, the Court, having found Dezfooli in contempt of court for failing to comply with the Court's orders, and pursuant to NRS 22.010 and 22.100, issued a bench warrant to arrest Dezfooli, with a bail amount of Five Hundred and 00/100 Dollars ($500.00) (the "***Original Bench Warrant***").

2. On December 11, 2020, the Court issued an amended bench warrant to arrest Dezfooli, with a bail amount of Ten Thousand and 00/100 Dollars ($10,000.00) (the "***Amended Bench Warrant***").

3. On February 23, 2020, Dezfooli was arrested and booked into the Clark County Detention Center.

4. On February 25, 2020, Dezfooli posted bond in the amount of $10,000 (the "***Bond***") and was released from the Clark County Detention Center.

5. To date, neither Dezfooli nor Best Floors LTD dba Best Buy Flooring ("***Best Floors***" and collectively with Dezfooli referred to as "***Judgment Debtors***") has responded to EHH's Interrogatories and Request for Documents served on Dezfooli and Best Floors on December 10, 2019 (the "***Original Discovery Requests***").

6. Given the time that has passed since service of the Original Discovery Requests, the parties agree to allow EHH to serve amended discovery requests (the "***Amended Discovery Requests***") on Judgment Debtors, to be answered within 21 days of service.

\ \ \

\ \ \

SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

7. Given the history of this case and the Court's extensive past involvement, the Court will retain jurisdiction over any dispute that arises regarding the Amended Discovery Requests.

Accordingly, NOW THEREFORE:

8. IT IS HEREBY ORDERED that both the Original Bench Warrant and Amended Bench Warrant are and shall be QUASHED.

9. IT IS FURTHER ORDERED that the Bond and/or all monies relating to the Bond that would have otherwise been returned to Dezfooli are ordered to be turned over to EHH and applied against the outstanding judgment.

10. IT IS FURTHER ORDERED that EHH shall have until the end of business on March 3, 2021 to serve the Amended Discovery Requests on Judgment Debtors via the Court's e-serve system.

11. IT IS FURTHER ORDERED that Judgment Debtors shall have 21 days from the date of service of the Amended Discovery Requests to provide full and complete responses.

12. IT IS FURTHER ORDERED that this Court shall retain jurisdiction over any dispute that arises regarding the Amended Discovery Requests, such that all motions relating thereto shall be brought to the Court as opposed to the Discovery Commissioner.

13. IT IS FURTHER ORDERED that a status check is and shall be set for **March 30, 2021 at 9:00 A.M.** to verify that Judgment Debtors have complied by providing full and complete responses to the Amended Discovery Requests.

IT IS SO ORDERED this 5th day of March, 2021.

Joanna S Kishner

DISTRICT COURT JUDGE

SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

Respectfully Submitted by:

SMITH & SHAPIRO, PLLC

/s/ James E. Shapiro

James E. Shapiro, Esq.
Nevada Bar No. 7907
Aimee M. Cannon Esq.
Nevada Bar No. 11780
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
Attorneys for Plaintiff The EHH Venture, LLC

Approved as to form:

HINDS INJURY LAW LAS VEGAS, LLC

/s/ Christina A. Hinds

Christina A. Hinds, Esq.
Nevada Bar No. 7014
600 S. Eighth St.
Las Vegas, NV 89101
Attorneys for Defendant Meelad Dezfooli

SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

EHH Venture LLC, Plaintiff(s)	CASE NO: A-16-746034-C
vs.	DEPT. NO. Department 31
Meelad Dezfooli, Defendant(s)	

AUTOMATED CERTIFICATE OF SERVICE

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Service Date: 9/29/2023

Andrew S. Blaylock .	ablaylock@smithshapiro.com
James E. Shapiro .	jshapiro@smithshapiro.com
Jill Berghammer .	jberghammer@smithshapiro.com
Sheldon Herbert .	sherbert@smithshapiro.com
James Shapiro	jshapiro@smithshapiro.com
Thomas Fell	tfell@fennemorelaw.com
Jennifer Bidwell	jbidwell@smithshapiro.com
Nicole Brewer	assistant@whiteheadburnett.com
Cheryl Landis	clandis@fennemorelaw.com
Cristina Hinds	cristina@hindsinjurylawlasvegas.com
Leah Roberts	paralegal@hindsinjurylawlasvegas.com

Electronically Filed
9/29/2023 9:47 AM
Steven D. Grierson
CLERK OF THE COURT

NEOJ
James E. Shapiro, Esq.
Nevada Bar No. 7907
Smith & Shapiro, PLLC
3333 E. Serene Ave., Suite #130
Henderson, NV 89074
(702) 318-5033
Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

THE EHH VENTURE LLC, a Nevada limited liability company,

Plaintiff,

vs.

MEELAD DEZFOOLI, an individual; JOSE BOLANOS,an individual; and DOES 1-10, and ROE ENTITIES 1-10, inclusive,

Defendants.

THE EHH VENTURE LLC, a Nevada limited liability company,

Plaintiff,

vs.

BEST FLOORS LTD dba BEST BUY FLOORING, a Nevada limited liability company; and DOES 1-10, and ROE ENTITIES 1-10, inclusive

Defendants.

BEST FLOORS LTD dba BEST BUY FLOORING, a Nevada limited liability company,

Counterclaimant,

vs.

THE EHH VENTURE LLC, a Nevada limited liability company; and DOES 1-10, and ROE ENTITIES 1-10, inclusive

Counterdefendants.

Case No. **A-16-746034-C**
Dept: XXXI

Consolidated with
A-16-748846-C

NOTICE OF ENTRY OF ORDER

\ \ \

\ \ \

SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

Case Number: A-16-746034-C

NOTICE OF ENTRY OF ORDER

PLEASE TAKE NOTICE that on September 29, 2023, the Court entered an ORDER: (1) DENYING MANOUCHER DEZFOOLI'S MOTION TO RELEASE BOND; AND (2) GRANTING THE EHH VENTURE, LLC'S COUNTERMOTION FOR RELEASE OF BOND TO PLAINTIFF PURSUANT TO THIS COURT'S MARCH 5, 2021 ORDER, a copy of which is attached hereto.

Dated this 29th day of September, 2023.

SMITH & SHAPIRO, PLLC

/s/ James E. Shapiro
James E. Shapiro, Esq.
Nevada Bar No. 7907
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of SMITH & SHAPIRO, PLLC, and that on the 29th day of September, 2023, I served a true and correct copy of the forgoing **ORDER: (1) DENYING MANOUCHER DEZFOOLI'S MOTION TO RELEASE BOND; AND (2) GRANTING THE EHH VENTURE, LLC'S COUNTERMOTION FOR RELEASE OF BOND TO PLAINTIFF PURSUANT TO THIS COURT'S MARCH 5, 2021 ORDER**, by e-serving a copy on all parties registered and listed as Service Recipients in Odyssey File & Serve.

/s/ Jennifer A. Bidwell
An employee of SMITH & SHAPIRO, PLLC

SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

ELECTRONICALLY SERVED
9/29/2023 9:28 AM

Electronically Filed
09/29/2023 9:26 AM
CLERK OF THE COURT

ORDR
James E. Shapiro, Esq.
Nevada Bar No. 7907
Smith & Shapiro, PLLC
3333 E. Serene Ave., Suite #130
Henderson, NV 89074
(702) 318-5033
Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

THE EHH VENTURE LLC, a Nevada limited liability company,
Plaintiff,
vs.
MEELAD DEZFOOLI, an individual; JOSE BOLANOS,an individual; and DOES 1-10, and ROE ENTITIES 1-10, inclusive,
Defendants.

THE EHH VENTURE LLC, a Nevada limited liability company,
Plaintiff,
vs.
BEST FLOORS LTD dba BEST BUY FLOORING, a Nevada limited liability company; and DOES 1-10, and ROE ENTITIES 1-10, inclusive
Defendants.

BEST FLOORS LTD dba BEST BUY FLOORING, a Nevada limited liability company,
Counterclaimant,
vs.
THE EHH VENTURE LLC, a Nevada limited liability company; and DOES 1-10, and ROE ENTITIES 1-10, inclusive
Counterdefendants.

Case No. **A-16-746034-C**
Dept: XXXI

Consolidated with
A-16-748846-C

ORDER:

(1) DENYING MANOUCHER DEZFOOLI'S MOTION TO RELEASE BOND;

AND

(2) GRANTING THE EHH VENTURE, LLC'S COUNTERMOTION FOR RELEASE OF BOND TO PLAINTIFF PURSUANT TO THIS COURT'S MARCH 5, 2021 ORDER

Date: September 19, 2020
Time: 9:00 a.m.

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SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

ORDER: (1) DENYING MANOUCHER DEZFOOLI'S MOTION TO RELEASE BOND; AND (2) GRANTING THE EHH VENTURE, LLC'S COUNTERMOTION FOR RELEASE OF BOND TO PLAINTIFF PURSUANT TO THIS COURT'S MARCH 5, 2021 ORDER

This matter having come on for hearing on September 19, 2023, on MANOUCHER DEZFOOLI'S MOTION TO RELEASE BOND [Doc ID# 169] (the "***Motion***"), and on THE EHH VENTURE, LLC'S COUNTERMOTION FOR RELEASE OF BOND TO PLAINTIFF PURSUANT TO THIS COURT'S MARCH 5, 2021 ORDER [Doc ID# 172] (the "***Countermotion***"); MANOUCHER DEZFOOLI ("***Mr. Dezfooli***"[1]) having appeared by and through his attorney of record, Cristina Hinds, Esq., of HINDS INJURY LAW LAS VEGAS, LLC; THE EHH VENTURE, LLC ("***EHH***") having appeared by and through its attorney of record, James E. Shapiro, Esq., of SMITH & SHAPIRO, PLLC; the Court having reviewed and considered the pleadings and papers on file herein [Doc ID#'s 161, 169, 171, 172, 174, & 177] and the arguments of counsel; the Court being fully advised in the premises and good cause appearing therefore, the Court finds, concludes and orders as follows:

1. On February 23, 2021, a Ten Thousand Dollars ($10,000.00) bond (the "***Bond***") was posted on behalf of Defendant / Judgment Debtor Meelad Dezfooli in conjunction with the bench warrant previously issued by this Court [Doc ID#'s 138, & 149]. A copy of the CASH BOND ACCEPTANCE NOTICE is attached hereto as ***Exhibit "A"***.

2. On March 2, 2021, this Court held on a hearing on the Bench Warrant Return.

3. All representations to the Court at the March 2, 2021 hearing were that Defendant Meelad Dezfooli was the one who had posted the Bond at issue.[2] There was no mention or representation that Mr. Dezfooli was the one who had posted the Bond on behalf of Defendant.

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[1] Not to be confused with the Defendant Meelad Dezfooli, although Mr. Dezfooli is Defendant Dezfooli's father.

[2] According to the Court's minutes from that hearing: "Defendant indicated ***he*** posted the bond through a bonding company." (emphasis added).

4. Three days later, on March 5, 2021, this Court entered an order (the "***March 5, 2021 Order***") in which this Court specifically ruled that: "the Bond and/or all monies relating to the Bond that would have otherwise been returned to Dezfooli are ordered to be turned over to EHH and applied against the outstanding judgment." A copy of the Court's March 5, 2021 order is attached hereto as ***Exhibit "B"*** and incorporated herein by this reference.

5. The plain reading of the March 5, 2021 Order demonstrates that the Bond, which Defendant Dezfooli represented had been posted by himself, was previously ordered to be turned over to EHH and applied against the outstanding judgment.

6. More than two years passed after entry of the March 5, 2021 Order before Mr. Dezfooli asserted that he, Mr. Dezfooli, was the one who had posted the Bond.

7. The time period to modify or amend the March 5, 2021 Order has long since passed, and the Court has not been provided with good cause to reconsider its prior ruling.

8. The March 5, 2021 Order is and remains a valid and enforceable order, which has not been modified, amended nor revoked.

NOW THEREFORE:

9. IT IS HEREBY ORDERED that MANOUCHER DEZFOOLI'S MOTION TO RELEASE BOND [Doc ID# 169] is hereby DENIED.

10. IT IS FURTHER ORDERED that THE EHH VENTURE, LLC'S COUNTERMOTION FOR RELEASE OF BOND TO PLAINTIFF PURSUANT TO THIS COURT'S MARCH 5, 2021 ORDER [Doc ID# 172] is hereby GRANTED.

11. IT IS FURTHER ORDERED that Clerk of the Court is hereby ordered and directed to return and deliver the Bond to The EHH Venture, LLC, by issuing a check in the amount of Ten Thousand Dollars ($10,000.00) made payable to "Smith & Shapiro, PLLC" and delivering the same to Smith & Shapiro, PLLC, attention James E. Shapiro, Esq., 3333 E. Serene Ave., Suite 130, Henderson, NV 89074, to be deposited into Smith & Shapiro, PLLC's trust account for the benefit of

\ \ \

\ \ \

SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

The EHH Venture, LLC, to be released to The EHH Venture, LLC (subject to any applicable fee agreement) and applied against the outstanding judgment.

IT IS SO ORDERED.

Dated: _____

Dated this 29th day of September, 2023

DISTRICT COURT JUDGE

F30 614 E7EE 984C
Joanna S. Kishner
District Court Judge

Prepared and Submitted By:

SMITH & SHAPIRO, PLLC

/s/ James E. Shapiro
James E. Shapiro, Esq.
Nevada Bar No. 7907
3333 E. Serene Ave., Suite 130
Henderson, Nevada 89074
Attorneys for Plaintiff

Approved as to Form:

HINDS INJURY LAW LAS VEGAS, LLC

Declined to sign
Cristina Hinds, Esq.
Nevada Bar No. 7014
600 South Eighth Street
Las Vegas, NV 89101
Attorneys for Manoucher Dezxfooli

SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

Exhibit “A”

Exhibit “A”

LV JUSTICE CT CRIMINAL
200 LEWIS 2ND FLOOR
LAS VEGAS, NV 89155

02/23/2021 15:33:16

CREDIT CARD

MC SALE

Card #	XXXXXXXXXXX7317
Chip Card:	MASTERCARD
AID:	A0000000041010
SEQ #:	3
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INVOICE	4
Approval Code:	094992
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Mode:	Issuer

SALE AMOUNT $10000.00

CUSTOMER COPY

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(702) 671-3116

http://www.clarkcountycourts.us/lvjc/index.html

CASH BOND ACCEPTANCE NOTICE

NOTICE TO APPEAR OFFICIAL RECEIPT

2/23/2021

A-16-746034-C

DEZFOOLI, MEELAD

Scope ID: **2869532**

Charges:	Contempt of court [52909]
Bail Amount:	$10,000.00
Cash Bond Payor:	MANOUCHEHR DEZFOOLO

YOU ARE TO APPEAR ON:

03/29/2021 at 9:00 am in District Court 702-671-4528

Failure to appear could result in a bench warrant being issued for your arrest.

Appropriate Courtroom attire required
No shorts, halter tops or tank tops, shoes are required.
(NO FOOD OR DRINK PERMITTED)

Exhibit “B”

Exhibit “B”

Electronically Filed
3/5/2021 1:26 PM
Steven D. Grierson
CLERK OF THE COURT

ORDR
James E. Shapiro, Esq.
Nevada Bar No. 7907
Andrew S. Blaylock, Esq.
Nevada Bar No. 13666
SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite #130
Henderson, NV 89074
(702) 318-5033
Attorneys for THE EHH VENTURE, LLC

DISTRICT COURT

CLARK COUNTY, NEVADA

THE EHH VENTURE LLC, a Nevada limited liability company,
Plaintiff,
vs.
MEELAD DEZFOOLI, an individual; JOSE BOLANOS, an individual; and DOES 1-10, and ROE ENTITIES 1-10, inclusive,
Defendants.

Case No. **A-16-746034-C**
Dept: XXXI

Consolidated with
A-16-748846-C

THE EHH VENTURE LLC, a Nevada limited liability company,
Plaintiff,
vs.
BEST FLOORS LTD dba BEST BUY FLOORING, a Nevada limited liability company; and DOES 1-10, and ROE ENTITIES 1-10, inclusive
Defendants.

BEST FLOORS LTD dba BEST BUY FLOORING, a Nevada limited liability company,
Counterclaimant,
vs.
THE EHH VENTURE LLC, a Nevada limited liability company; and DOES 1-10, and ROE ENTITIES 1-10, inclusive
Counterdefendants.

ORDER REGARDING BENCH WARRANT RETURN FOR JUDGMENT DEBTOR MEELAD DEZFOOLI

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SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

Case Number: A-16-746034-C

ORDER REGARDING BENCH WARRANT RETURN FOR JUDGMENT DEBTOR MEELAD DEZFOOLI

THIS MATTER having come before the Court on the bench warrant return of Meelad Dezfooli ("***Dezfooli***"), Judgment Debtor Dezfooli having appeared by and through his attorneys of record, HINDS INJURY LAW LAS VEGAS, Judgment Creditor THE EHH VENTURE LLC, a Nevada limited liability company ("***EHH***" or "***Judgment Creditor***") having appeared by and through its attorneys of record, SMITH & SHAPIRO, PLLC, the Court being fully advised in the premises, and good cause appearing therefore:

1. On June 9, 2020, the Court, having found Dezfooli in contempt of court for failing to comply with the Court's orders, and pursuant to NRS 22.010 and 22.100, issued a bench warrant to arrest Dezfooli, with a bail amount of Five Hundred and 00/100 Dollars ($500.00) (the "***Original Bench Warrant***").

2. On December 11, 2020, the Court issued an amended bench warrant to arrest Dezfooli, with a bail amount of Ten Thousand and 00/100 Dollars ($10,000.00) (the "***Amended Bench Warrant***").

3. On February 23, 2020, Dezfooli was arrested and booked into the Clark County Detention Center.

4. On February 25, 2020, Dezfooli posted bond in the amount of $10,000 (the "***Bond***") and was released from the Clark County Detention Center.

5. To date, neither Dezfooli nor Best Floors LTD dba Best Buy Flooring ("***Best Floors***" and collectively with Dezfooli referred to as "***Judgment Debtors***") has responded to EHH's Interrogatories and Request for Documents served on Dezfooli and Best Floors on December 10, 2019 (the "***Original Discovery Requests***").

6. Given the time that has passed since service of the Original Discovery Requests, the parties agree to allow EHH to serve amended discovery requests (the "***Amended Discovery Requests***") on Judgment Debtors, to be answered within 21 days of service.

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\ \ \

SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

7. Given the history of this case and the Court's extensive past involvement, the Court will retain jurisdiction over any dispute that arises regarding the Amended Discovery Requests.

Accordingly, NOW THEREFORE:

8. IT IS HEREBY ORDERED that both the Original Bench Warrant and Amended Bench Warrant are and shall be QUASHED.

9. IT IS FURTHER ORDERED that the Bond and/or all monies relating to the Bond that would have otherwise been returned to Dezfooli are ordered to be turned over to EHH and applied against the outstanding judgment.

10. IT IS FURTHER ORDERED that EHH shall have until the end of business on March 3, 2021 to serve the Amended Discovery Requests on Judgment Debtors via the Court's e-serve system.

11. IT IS FURTHER ORDERED that Judgment Debtors shall have 21 days from the date of service of the Amended Discovery Requests to provide full and complete responses.

12. IT IS FURTHER ORDERED that this Court shall retain jurisdiction over any dispute that arises regarding the Amended Discovery Requests, such that all motions relating thereto shall be brought to the Court as opposed to the Discovery Commissioner.

13. IT IS FURTHER ORDERED that a status check is and shall be set for **March 30, 2021 at 9:00 A.M.** to verify that Judgment Debtors have complied by providing full and complete responses to the Amended Discovery Requests.

IT IS SO ORDERED this 5th day of March, 2021.

Joanna S Kishner

DISTRICT COURT JUDGE

SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

Respectfully Submitted by:

SMITH & SHAPIRO, PLLC

/s/ James E. Shapiro

James E. Shapiro, Esq.
Nevada Bar No. 7907
Aimee M. Cannon Esq.
Nevada Bar No. 11780
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
Attorneys for Plaintiff The EHH Venture, LLC

Approved as to form:

HINDS INJURY LAW LAS VEGAS, LLC

/s/ Christina A. Hinds

Christina A. Hinds, Esq.
Nevada Bar No. 7014
600 S. Eighth St.
Las Vegas, NV 89101
Attorneys for Defendant Meelad Dezfooli

SMITH & SHAPIRO, PLLC
3333 E. Serene Ave., Suite 130
Henderson, NV 89074
O:(702)318-5033 F:(702)318-5034

CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

EHH Venture LLC, Plaintiff(s)	CASE NO: A-16-746034-C
vs.	DEPT. NO. Department 31
Meelad Dezfooli, Defendant(s)	

AUTOMATED CERTIFICATE OF SERVICE

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Service Date: 9/29/2023

Andrew S. Blaylock .	ablaylock@smithshapiro.com
James E. Shapiro .	jshapiro@smithshapiro.com
Jill Berghammer .	jberghammer@smithshapiro.com
Sheldon Herbert .	sherbert@smithshapiro.com
James Shapiro	jshapiro@smithshapiro.com
Thomas Fell	tfell@fennemorelaw.com
Jennifer Bidwell	jbidwell@smithshapiro.com
Nicole Brewer	assistant@whiteheadburnett.com
Cheryl Landis	clandis@fennemorelaw.com
Cristina Hinds	cristina@hindsinjurylawlasvegas.com
Leah Roberts	paralegal@hindsinjurylawlasvegas.com

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract **COURT MINUTES** **January 17, 2017**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

January 17, 2017 **9:00 AM** **Motion**

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

COURT CLERK: Sandra Harrell

RECORDER: Rachelle Hamilton

REPORTER:

PARTIES PRESENT:

Blaylock, Andrew S.	Attorney
Dezfooli, Meelad M	Defendant
Thomson, John W.	Attorney

JOURNAL ENTRIES

- DEFENDANT MEELAD DEZFOOLI'S AFFIDAVIT IN CONTRAVENTION OF FIVE-DAY NOTICE ON SUMMARY EVICTION, REQUEST FOR HEARING, AND MOTION FOR ORDER PREVENTING PLAINTIFF FROM LOCKING OUT DEFENDANT AND FROM FURTHER ATTEMPTS AT SUMMARY EVICTION

Court notes matter filed in District Court instead of Justice Court, parties to address Jurisdiction issue. Colloquy. Mr. Thomson states issue may be moot because the Plaintiffs have filed an unlawful detainer action in another department (Dept 9), next motion may be a motion to consolidate. Mr. Blaylock argued standing issue, agree that today's motion is probably moot. Counsel state unlawful detainer hearing set for 2/8/17. COURT ORDERED, matter CONTINUED.

CONTINUED TO: 2/21/17 9:30 AM

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**June 22, 2017**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

June 22, 2017 **9:00 AM** **Hearing**

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

COURT CLERK: Tena Jolley

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT:

Shapiro, James E.	Attorney
Thomson, John W.	Attorney

JOURNAL ENTRIES

- The Court NOTED the parties submitted a Stipulation and Order to Stay Proceedings and the Court needs additional information as no reason was given for the stay and it was also an open ended stay. Mr. Shapiro indicated that there is another case that has had a number of hearings which will resolve a majority of the issues in this case; the other case before Judge Togliatti is set for trial February 12, 2018. Mr. Thomson indicated that procedurally the cases were filed in reverse; that this case is regarding the guarantee on the lease and because they are alleging continued defaults of that lease, they cannot ascertain what their damage or remedy; and that ideally the unlawful detainer action would have been filed first and then the breach of contract, breach of guarantee would have been filed later; and he did suggest a consolidation which was denied. Court inquired if the cases should not be consolidated as there are overlapping issues. Mr. Thomson indicated that plaintiff could dismiss the case without prejudice and then refile it. Mr. Shapiro indicated he would discuss the matter with his client and that they would either dismiss or move for consolidation. COURT DIRECTED counsel to submit a new stipulation or a status update by noon on June 29, 2017 and ORDERED, matter SET for Status Check on the Court's Chambers Calendar.

6/30/17 (CHAMBERS) STATUS CHECK: DISMISSAL OR STIPULATION TO CONSOLIDATE

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**June 30, 2017**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

June 30, 2017 **3:00 AM** **Status Check**

HEARD BY: Kishner, Joanna S. **COURTROOM:** Chambers

COURT CLERK: Kory Schlitz

RECORDER:

REPORTER:

PARTIES PRESENT:

JOURNAL ENTRIES

- COURT indicated they have not received an update Re; Stipulation and order for Dismissal or for Consolidation and ORDERED matter SET for in person Status Check.

7/27/17 9:00 A.M. STATUS CHECK: DISMISSAL OR STIPULATION TO CONSOLIDATE

CLERK'S NOTE: Counsel is to ensure a copy of the foregoing minute order is distribute to all interested parties; additionally, a copy of the foregoing minute order was distributed electronically to all parties. (6-30-17 ks)

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**September 13, 2017**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

September 13, 2017 9:30 AM Show Cause Hearing

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

COURT CLERK: Denise Duron

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT:

Dezfooli, Meelad M	Defendant
Shapiro, James E.	Attorney
Thomson, John W.	Attorney

JOURNAL ENTRIES

- Arguments by counsel regarding whether an evidentiary hearing would be necessary. Upon Court's inquiry, Mr. Shapiro stated a settlement conference would not be necessary, noting there is no trust. Colloquy between Court and counsel regarding an evidentiary hearing. Matter TRAILED for counsel to discuss date availability for an evidentiary hearing. Matter RECALLED. COURT ORDERED, status check SET on Chambers Calendar and directed counsel to contact Chambers regarding date availability.

9/15/17 STATUS CHECK (CHAMBERS)

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**September 28, 2017**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

September 28, 2017 2:30 PM Telephonic Conference

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

COURT CLERK: April Watkins

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT:

Blaylock, Andrew S.	Attorney
Shapiro, James E.	Attorney
Thomson, John W.	

JOURNAL ENTRIES

- Court advised an order shortening time was received on a motion to withdraw which was set the same time as the evidentiary hearing. Further, it is not clear if counsel wants motion to be heard. Mr. Shapiro stated he wants evidentiary hearing to move forward as soon as possible. Mr. Thomson stated he would like motion to withdraw heard on October 3, 2017, advised he is not prepared to go forward with evidentiary hearing and believes it is not appropriate for counsel to go forward with evidentiary hearing. Court stated no rulings will be made today and will leave things as is for date and time already scheduled for. Mr. Thomson further stated as stated in letter, counsel responded to Mr. Shapiro's communication a week ago and was told by his office matter set for October 3, 2017. Counsel was not available to prepare for hearing due to travel schedule and Mr. Thomson stated he is concerned there was ex-parte communication with Department XXXI which has since been clarified in a letter. Further, Mr. Thomson stated he was under the impression date had not been set yet as he received no notice from Mr. Shapiro's office. Motion to withdraw was filed and noted there is 75 days until end of discovery. Additionally, there has been prior delays at no fault of counsel or client, received un-filed opposition, request evidentiary hearing be continued for client to obtain new counsel and request to have motion to withdraw heard on October 3, 2017. Court noted there is a properly noticed motion and properly noticed order shortening time. Further, there was no ex-parte

communication, parties provided the Court with dates and the Court chose date available for the Court. Colloquy. COURT ORDERED, all matters STAND for October 3, 2017, at 1:30 p.m.

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**October 03, 2017**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

October 03, 2017 **1:00 PM** **All Pending Motions**

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

COURT CLERK: April Watkins

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT:

Blaylock, Andrew S.	Attorney
Dezfooli, Meelad M	Defendant
Shapiro, James E.	Attorney
Thomson, John W.	

JOURNAL ENTRIES

- Joseph Lee, Representative for Pltf.

JOHN W. THOMSON, ESQ'S MOTION TO WITHDRAW AS ATTORNEY OF RECORD ON ORDER SHORTENING TIME... SHOW CAUSE HEARING...EVIDENTIARY HEARING...DEFT'S COUNTERMOTION FOR SANCTIONS AND AWARD OF ATTORNEY FEES AND COSTS

Mr. Shapiro objected to motion to withdraw until after evidentiary hearing is held. Statement by Mr. Thomson. Colloquy. Mr. Thomson argued he has certified under oath that counsel cannot continue to represent Defts', reasons are clear, uncontroverted and requested to continue all pending matters on behalf of client. Further opposition by Mr. Shapiro. Additional argument by Mr. Thomson. Upon Court's inquiry, Deft. Dezfooli advised he has sought out counsel and requested additional time. Additional arguments by counsel. Court FINDS motion is appropriate, have proper affidavit, proper order shortening time, took into account counsel is sole practitioner and ORDERED, motion GRANTED. Deft. Dezfooli stated the only objection he has is time to get counsel and has no objection to motion to withdraw. Court stated motion was granted on individual and corporation and

ORDERED, matter SET for status check on corporate counsel. Further, Court stated cannot conduct hearing as to the corporation but can hear as to individual, inclined to continue and inclined to keep trial dates. Mr. Shapiro argued there has been 19 violations of the Court's order and prepared to show violations. Further, rent due on the first, amount submitted was not correct, have not received appropriate rent for October, have checks that have been returned and noted a personal check was received in the amount of $9,233.46. Mr. Thomson stated per order, amount has been received every month since the order. Further, still disputing CAM charges as accounting has not been made and Deft. has paid. Court stated she is not inclined to give 60 days to obtain counsel but will give 30 days to obtain counsel. Upon further inquiry of the Court, Mr. Shapiro advised two witnesses, two and a half hours for Pltf. for evidentiary hearing. Mr. Thomson stated two witnesses and approximately 26 exhibits right now. FURTHER ORDERED, countermotion, order to show cause, status check regarding fees and costs as a result of Deft. not being prepared for scheduled hearing on October 3, 2017.

Deft's counsel to prepare the order within 10 days pursuant to EDCR 7.21. Order must contain all new court dates and future court dates for all pending motions.

11/2/17 10:00 AM STATUS CHECK: PURSUANT TO EDCR 7.42 REGARDING CORPORATE COUNSEL...DEFT'S COUNTERMOTION FOR SANCTIONS AND AWARD OF ATTORNEY FEES AND COSTS...SHOW CAUSE HEARING...EVIDENTIARY HEARING

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**November 02, 2017**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

November 02, 2017 10:00 AM All Pending Motions

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

COURT CLERK: Aja Brown

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT:

Blaylock, Andrew S.	Attorney
Dezfooli, Meelad M	Defendant
Fell, Thomas H	Attorney
Shapiro, James E.	Attorney

JOURNAL ENTRIES

- Joseph Lee, a representative of EHH Venture LLC, also present.

Court noted Mr. Fell previously filed a Notice of Appearance on October 30, 2017; however, the Court has not received any substantive oppositions or pleadings. Mr. Fell confirmed, noting previous counsel filed an opposition to the Motion on calendar today. Upon Court's inquiry, Mr. Fell confirmed he is representing Best Flooring Ltd and Mr. Dezfooli. Testimony and exhibits presented (see worksheets). Parties rest. CONFERENCE AT BENCH. Closing arguments by Mr. Shapiro and Mr. Fell. COURT STATED ITS FINDINGS, and ORDERED, Writ of Restitution DENIED WITHOUT PREJUDICE. COURT FURTHER ORDERED, Sanctions INCREASED to $14,880.35; which shall be 3 times the ordered amount if paid by bond and will be the amount as ordered if paid by cash. Colloquy regarding outstanding check for rent for the month of November. COURT ORDERED, funds in the amount of $9,432.26 be subtracted from the ordered amount of $14,880.35; which shall be deposited by the close of business on November 27, 2017. Court noted confirmation that the funds were deposited shall be provided to the Court. Further colloquy regarding monthly rental amount. Mr. Fell confirmed his client will pay the amount of $9,468.26 in rental fees until trial commences.

COURT SO NOTED. With respect to the global request for Attorney Fees, COURT FURTHER ORDERED, ruling DEFERRED, pending trial. Colloquy regarding fees for multiplying the proceedings. Further colloquy regarding future rent payments. Court DIRECTED Mr. Shapiro to prepare the order and circulate to defense counsel pursuant to EDCR 7.21. Court clarified submission of exhibits 31-33.

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**November 08, 2017**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

November 08, 2017	**9:30 AM**	**Motion to Compel**	**Plaintiff's Motion to Compel Discovery**

HEARD BY: Bulla, Bonnie **COURTROOM:** RJC Level 5 Hearing Room

COURT CLERK: Jennifer Lott

RECORDER: Francesca Haak

REPORTER:

PARTIES PRESENT:

Gray, Tyre	Attorney
Shapiro, James E.	Attorney

JOURNAL ENTRIES

- Tyre Gray, Esquire, for Best Flooring Ltd.

Mr. Shapiro stated Mr. Gray agreed to produce documents by the 20th, but counsel cannot agree on Mr. Shapiro's request for $1,500 attorney fee award against the client (not new counsel). Colloquy re: Johnny Ribeiro. COMMISSIONER RECOMMENDED, motion is GRANTED within parameters; Commissioner RESERVED THE RIGHT to impose Rule 37 sanctions if there is a failure to supplement by 11-20-17 as agreed to by counsel; Status Check SET. Mr. Shapiro to prepare the Report and Recommendations, and Mr. Gray to approve as to form and content. A proper report must be timely submitted within 10 days of the hearing. Otherwise, counsel will pay a contribution. Counsel can contact Discovery to take the Status Check off calendar.

11-29-17 9:00 a.m. Status Check: Compliance / Attorney fees

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract **COURT MINUTES** **January 04, 2018**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

January 04, 2018 **3:00 AM** **Status Check: Compliance**

HEARD BY: Bulla, Bonnie **COURTROOM:** No Location

COURT CLERK: Jennifer Lott

RECORDER:

REPORTER:

PARTIES PRESENT:

JOURNAL ENTRIES

- The 11-8-17 Report and Recommendation remains outstanding. Mr. Shapiro was given the responsibility to submit the Report and Recommendation from the 11-8-17 hearing. A proper report must be timely submitted within 10 days of the hearing. Otherwise, counsel will pay a sanction. COMMISSIONER RECOMMENDED, matter CONTINUED to an in chambers status check.

CLERK'S NOTE: A copy of this minute order was placed in the attorney folder(s) of:

James Shapiro - Smith & Shapiro

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract **COURT MINUTES** **August 02, 2018**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

August 02, 2018 **9:00 AM** **Status Check**

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

COURT CLERK: Tena Jolley

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT:

Gray, Tyre	Attorney
Rawlins, Michael D	Attorney

JOURNAL ENTRIES

- Counsel announced ready and anticipate 3-5 days for Trial. The Court inquired if the parties would like to go to a settlement conference. Mr. Rawlins indicated no and Mr. Gray stated he would discuss the matter further with opposing counsel.

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**September 27, 2018**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

September 27, 2018 9:00 AM Motion to Withdraw as Counsel

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

COURT CLERK: Tena Jolley

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT:

Blaylock, Andrew S.	Attorney
Dezfooli, Meelad M	Defendant
Fell, Thomas H	Attorney

JOURNAL ENTRIES

- Following arguments by Mr. Fell, Mr. Blaylock and Mr. Dezfooli, the Court stated its FINDINGS and ORDERED Fennemore Craig, P.C.'s Motion to Withdraw as Attorney of Record GRANTED and matter SET for Status Check regarding Corporate Counsel for Best Flooring, Ltd. Mr. Fell to prepare the Order and including all upcoming dates in the Order within ten (10) days pursuant to EDCR 7.21.

10/18/18 10:15 AM STATUS CHECK: CORPORATE COUNSEL FOR BEST FLOORING, LTD.

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**October 18, 2018**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

October 18, 2018 **10:15 AM** **All Pending Motions**

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

COURT CLERK: Tena Jolley

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT:

Dezfooli, Meelad M	Defendant
Shapiro, James E.	Attorney

JOURNAL ENTRIES

- PRE TRIAL CONFERENCE...STATUS CHECK: EDCR 7.42 CORP COUNSEL FOR BEST FLOORING LTD.

Mr. Dezfooli stated he has contacted six office to try and secure counsel for Best Flooring and due to the impending trial date and their current schedules had has been unable to retain counsel and requested a trial continuance. The Court noted this was the fourth setting and inquired of plaintiff counsel's position. Mr. Shapiro indicated he would defer to the Court. Mr. Dezfooli further stated that he has retained settlement conference counsel to attempt to negotiate a settlement otherwise he would like to move forward with trial but that he needed more time to secure counsel for Best Flooring. Mr. Shapiro stated he would have no objection to continuing to the next or February 2019 Stack, but that he would like it to be a firm setting. The Court noted Best Flooring is non-compliant with EDCR 7.42, however based on the agreement of the parties, the matter will be set for a fifth trial setting. Accordingly, COURT ORDERED, Trial Dates VACATED and RESET; the Court is not opening up any past deadlines and only continuing trial to allow Mr. Dezfooli to retain corporate counsel for Best Flooring, Ltd. COURT FURTHER ORDERED, Status Check for Corporate Counsel CONTINUED to November 27, 2018 at 9:00 a.m. as requested by Mr. Dezfooli, noting that the Court has now allowed 60 days to retain counsel and if Corporate Counsel is not retained by the next

hearing date, the Court will be considering sanctions, up to and including Striking Defendant Best Flooring, Ltd. answer.

At the request of Mr. Shapiro, COURT ORDERED Plaintiff's Motion in Limine previously set for hearing on October 30, 2018, STANDS.

10/30/18 9:00 AM PLAINTIFF'S MOTION IN LIMINE

11/27/18 9:00 AM STATUS CHECK: EDCR 7.42 CORP COUNSEL FOR BEST FLOORING LTD.

1/10/19 10:15 AM PRE TRIAL CONFERENCE

2/5/19 9:00 AM CALENDAR CALL

2/11/19 9:00 AM BENCH TRIAL (5 WEEK STACK)

CLERK'S NOTE: Minutes corrected to reflect Plaintiff's Motion in Limine hearing would remain as scheduled for hearing on October 30, 2018. (tmj:10/29/18)

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**October 30, 2018**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

October 30, 2018 **9:00 AM** **Motion in Limine**

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

COURT CLERK: Tena Jolley

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT:

Dezfooli, Meelad M	Defendant
Shapiro, James E.	Attorney

JOURNAL ENTRIES

- The Court noted it was inclined to grant Plaintiff's Motion in Limine pursuant to EDCR 2.20 and on the merits as there was no opposition and previously stated it would be granted as unopposed. Mr. Shapiro stated Mr. Dezfooli cannot represent a corporate entity. Mr. Dezfooli stated he needed time to retain corporate counsel and was unaware that he could oppose personally. Court FINDS no good cause to have not opposed and will allow oral argument. Mr. Dezfooli stated he opposed the motion and indicated his new counsel is Zachary Takos. Mr. Shapiro requested that motion be granted and the case move forward. Taking into account defendant's oral statement in opposition, COURT ORDERED, Plaintiff's Motion In Limine GRANTED pursuan to EDCR 2.20, both individually and on behalf of Best Flooring, Ltd. Mr. Shapiro to prepare the Order, circulating to opposing counsel and provide it back to the Court in accordance with EDCR 7.21.

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**November 27, 2018**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

November 27, 2018 **9:00 AM** **Status Check: Confirmation of Counsel**

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

COURT CLERK: Tena Jolley

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT:

Burnett, Gary B.	Attorney
Shapiro, James E.	Attorney

JOURNAL ENTRIES

- Mr. Burnett indicated he recently filed a notice of appearance and he represents both Mr. Dezfooli and Best Flooring Ltd. Court reviewed upcoming dates, reminding counsel Trial dates remain and to comply with EDCR 2.67, 2.68 and 2.69.

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract **COURT MINUTES** **January 10, 2019**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

January 10, 2019 **10:15 AM** **Pre Trial Conference**

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

COURT CLERK: Tena Jolley

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT:

Burnett, Gary B.	Attorney
Shapiro, James E.	Attorney

JOURNAL ENTRIES

- Defense counsel not present when case was called. The Court confirmed that Chambers had received notification from Mr. Burnett's office that he was enroute and matter was TRAILED.

MATTER RECALLED. Mr. Shapiro anticipated 3-4 days for trial and requested February 19, 2019 for trial. Mr. Burnett indicated that co-counsel teaches on Mondays and Tuesdays. Colloquy regarding trial setting. At counsel's request, COURT ORDERED, Trial SET for for February 20 - 22, 2019 as No. 2 setting; Calendar Call RESET; and Joint Pretrial Memorandum DUE by 4:00 p.m. February 5, 2019.

2/12/19 9:00 AM CALENDAR CALL

2/20/19 10:00 AM BENCH TRIAL

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**February 12, 2019**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

February 12, 2019 **9:00 AM** **All Pending Motions**

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

COURT CLERK: Tena Jolley

RECORDER: Sandra Pruchnic

REPORTER:

PARTIES PRESENT:

Burnett, Gary B.	Attorney
Shapiro, James E.	Attorney

JOURNAL ENTRIES

- SHOW CAUSE HEARING...CALENDAR CALL

The Court noted there was no opposition filed regarding the Order to Show Cause. Mr. Burnett indicated payment was made last Friday. Mr. Shapiro indicated only the rent payment was made, no late fees or interest and defendant was required to pay all amounts due, has been given every opportunity, has done nothing, and requested defendant's answer be stricken. Mr. Burnett acknowledged there was no dispute that only the rent was paid on February 8, 2019. The Court then reviewed plaintiff's compliance and defendant's non-compliance with EDCR 2.67, 2.68 and 2.69. COURT ORDERED Defendant's Answer and Counter-Claim STRICKEN and Trial Dates VACATED. Mr. Shapiro to prepare the Order, circulating to opposing counsel and provide it back to the Court in accordance with EDCR 7.21. Mr. Shapiro indicated he would Notice a default judgment hearing in the ordinary course.

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**April 11, 2019**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

April 11, 2019	**10:00 AM**	**Prove Up/Default**	**Notice of Hearing Regarding Prove Up Default Judgment (Best Floors LTD dba Best Buy Flooring)**

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

COURT CLERK: Tena Jolley

RECORDER: Rubina Feda

REPORTER:

PARTIES PRESENT:

Dezfooli, Meelad M	Defendant
Shapiro, James E.	Attorney
Whitehead, Jeffrey J, ESQ	Attorney

JOURNAL ENTRIES

- Mr. Shaprio indicated he has a copy of the exhibits in a binder for the Court to review. Upon Court's inquiry, Mr. Whitehead confirmed he would like to participate in the hearing today. Mr. Shapiro argued to his knowledge Mr. Whitehead does not have a right to participate once a default has been entered against his client. COURT INFORMED parties a determination needs to be made whether Mr. Whitehead can participate today, adding there has been no request, and nothing has been noticed to the Court prior to this hearing. Upon Courts' inquiry, parties confirm there is no agreement with Mr. Whitehead participating today. Mr. Shaprio informed the Court he was not aware Mr. Whitehead was going to appear in Court today. Colloquy regarding Foster v. Dingwall. Mr. Whitehead requested to cross examine the witness, adding parities stipulated to moving the matter to today. Mr. Shapiro stated his concern with Mr. Whitehead cross examining the witness is the matter would be turned into a trial and not a prove up for default. Mr. Shapiro requested the Defense attorney be required to identify the nature and the scope of their involvement, and he would like an opportunity

to provide written briefing to address the issue, and requested the Court rule on the matter. Mr. Whitehead stated no objection to the briefing, however requested it be short and expedited. Colloquy regarding scheduling of continued hearing. COURT STATED pursuant to conversations, parties will let the Court know when the matter can be continued.

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**May 16, 2019**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

May 16, 2019 **9:30 AM** **All Pending Motions**

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

COURT CLERK: Susan Botzenhart

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT:

Shapiro, James E.	Attorney
Whitehead, Jeffrey J, ESQ	Attorney

JOURNAL ENTRIES

- DEFENDANTS' MOTION FOR RELIEF UNDER NRCP RULE 60B...DEFENDANTS' REQUEST TO PARTICIPATE IN DEFAULT JUDGMENT HEARING

Arguments by counsel. COURT ORDERED, Motion for relief DENIED; request to participate in default judgment hearing GRANTED IN PART, as Defendant will be permitted to cross examine the witness for default proceedings. Mr. Shapiro to prepare the order and run it by opposing counsel for approval of form and content.

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract **COURT MINUTES** **July 11, 2019**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

July 11, 2019 **1:00 PM** **Bench Trial**

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

COURT CLERK: Susan Botzenhart

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT:

Burnett, Gary B.	Attorney
Shapiro, James E.	Attorney

JOURNAL ENTRIES

- This prove up hearing proceeded as a bench trial.

Testimony and Exhibits presented (See Worksheets.). Both sides rested. Closing arguments by counsel.

COURT ORDERED, Plaintiff's Application for Default Judgment GRANTED IN PART and DENIED IN PART; Court GRANTS damages in the amount of $354,646.89, minus the HVAC of $4,600.00, attorney fees in the amount of $194,733.00 will be awarded, and costs in the amount of $20,359.39 will also be awarded.

COURT ADDITIONALLY ORDERED, the bond posted by Plaintiff in the amount of $1,000.00 is appropriate to be released to Plaintiff, this does not offset $354,646.89, the bond in the amount of $20,238.35 will be released to Plaintiff, and this does offset the $354,646.89.

At request of counsel, COURT FURTHER ORDERED, the Court will reserve ruling regarding treble damages, and counsel may submit supplemental briefing on this, including courtesy copies by no later than August 2, 2019 by 4:00 P.M.

Mr. Shapiro to submit the proposed judgment; opposing counsel to approve form and content.

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**September 04, 2019**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

September 04, 2019 3:00 AM Minute Order

HEARD BY: Kishner, Joanna S. **COURTROOM:** Chambers

COURT CLERK: Susan Botzenhart

RECORDER:

REPORTER:

PARTIES PRESENT:

JOURNAL ENTRIES

- On March 15, 2019, an Application for Default Judgment was filed by Plaintiff EHH Venture LLC. On April 11, 2019, an Opposition was filed by Defendants' Best Floors Ltd. and Meelad Dezfooli. The matter came on for prove-up hearing on Department XXXI's July 11, 2019 Motion Calendar. The Court allowed Defendants to cross examine Plaintiff's witnesses and make arguments relating thereto. The Court granted in part and denied in part the Application for Default Judgment. The Court reserved ruling regarding treble damages and allowed the parties to submit supplemental briefing on this issue, including a courtesy copy to the Court by August 2, 2019 at 4:00 p.m.

On August 1, 2019, the Default Judgment Order was filed by Plaintiff with Notice of Entry. On August 2, 2019 at 3:08 p.m., a Supplemental Brief Regarding Treble Damages was filed by Plaintiff. After thorough review of the papers and pleadings in this matter the Court finds as follows:

Pursuant to NRS 40.2512 and NRS 40.360, the Court DENIES the request for treble damages. NRS 40.2512 sets forth the legal standard for unlawful detainer after default in payment of rents, and states:

A tenant of real property or a mobile home for a term less than life is guilty of an unlawful detainer when the tenant continues in possession, in person or by subtenant, after default in the payment of

any rent and after a notice in writing, requiring in the alternative the payment of the rent or the surrender of the detained premises, remains uncomplied with for a period of 5 days, or in the case of a mobile home lot, 10 days after service thereof. The notice may be served at any time after the rent becomes due.

NRS 40.360, which explains the judgment to be entered for unlawful detainer, states in pertinent part:

1. Judgment. If, upon the trial, the verdict of the jury, or, if the case be tried without a jury, the finding of the court, be in favor of the plaintiff and against the defendant, judgment shall be entered for the restitution of the premises; and, if the proceeding be for unlawful detainer after neglect or failure to perform any condition or covenant of the lease or agreement under which the property is held, or after default in the payment of rent, the judgment shall also declare the forfeiture of such lease or agreement.

2. Damages. The jury or the court, if the proceeding be tried without a jury, shall also assess the damages occasioned to the plaintiff by any forcible entry, or by any forcible or unlawful detainer, and any amount found due the plaintiff by reason of waste of the premises by the defendant during the tenancy, alleged in the complaint and proved on the trial, and find the amount of any rent due, if the alleged unlawful detainer be after default in the payment of rent; and the judgment shall be rendered against the defendant guilty of the forcible entry, or forcible or unlawful detainer, for the rent and for three times the amount of the damages thus assessed. (emphasis added)
.

In this case, Best Floors was delinquent in paying CAM charges starting in Jun 2016 (two months after the Leases were signed) and was likewise delinquent in paying rent starting in September 2016. The case was about delinquent rent rather than damage to the premises or a wasting of the premises as set forth in the statute. Thus, the Court does not find that the intent or the plain language of the statute would be met by the award of treble damages in the instant case. While the Court is appreciative of the delay in rent payments, the delay in the recovery of those rent payments and the time it took to have the matter heard due to the actions of defendants; Plaintiff received damages consistent with the terms of the contract between the parties and in accordance with applicable law. There was no evidence presented to the Court that defendant damaged the premises, did a forcible entry, or laid waste to the premises or otherwise engaged in conduct that would merit treble damages. Thus, the Court DENIES the request for treble damages.

This Decision sets forth the Court's intended disposition on the subject but anticipates further Order of the Court to make such disposition effective as an Order or Judgment. Such Order should set forth a synopsis of the supporting reasons proffered to the Court in briefing.

Counsel is directed to prepare the Order, and submit to Chambers for consideration in accordance with EDCR 7.21.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk Susan

Botzenhart, to all parties registered for Odyssey File & Serve. sb

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**February 27, 2020**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

February 27, 2020	**9:00 AM**	**Motion to Compel**	**Notice of Hearing of Judgment Creditor's Motion to Compel and for Sanctions**

HEARD BY: Truman, Erin **COURTROOM:** RJC Level 5 Hearing Room

COURT CLERK: Jennifer Lott

RECORDER: Francesca Haak

REPORTER:

PARTIES PRESENT: Blaylock, Andrew S. Attorney

JOURNAL ENTRIES

- Motion having been duly filed and served, no opposition having been filed, pursuant to EDCR 2.20(e) and for good cause shown, COMMISSIONER RECOMMENDED, motion GRANTED; objections WAIVED except for privileges, and the Judgment Debtor must respond to all served discovery within 30 days from today, by 3-27-2020; Commissioner Will Not Grant Attorney fees today.

Commissioner RESERVED RULING on the Motion for Sanctions, and for Attorney fees; Status Check SET for Commissioner to determine if Attorney fees are warranted. Mr. Blaylock to prepare the Report and Recommendations, and opposing counsel to approve as to form and content. A proper report must be timely submitted within 14 days of the hearing. Otherwise, counsel will pay a contribution.

4-3-2020 9:30 a.m. Status Check: Compliance / Production of Documents / Attorney fees

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Jennifer Lott, to all registered parties for Odyssey File & Serve. jl

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**April 03, 2020**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

April 03, 2020	**9:30 AM**	**Status Check**	**Status Check: Compliance / Production of documents / Attorney fees**

HEARD BY: Truman, Erin **COURTROOM:** RJC Level 5 Hearing Room

COURT CLERK: Jennifer Lott

RECORDER: Francesca Haak

REPORTER:

PARTIES PRESENT: Shapiro, James E. Attorney

JOURNAL ENTRIES

- Mr. Shapiro stated there was no compliance, he has been in contact with the Judgment Creditor's counsel, and the client is not speaking with his attorney. Colloquy. COMMISSIONER RECOMMENDED, Motion for Sanctions (Attorney fees) is DENIED. No further Status Check set. The Minute Order will suffice.

CLERK S NOTE: This Minute Order was electronically served by Courtroom Clerk, Jennifer Lott, to all registered parties for Odyssey File & Serve. jl

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**April 17, 2020**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

April 17, 2020 **3:00 AM** **Motion to Withdraw as Counsel**

HEARD BY: Kishner, Joanna S. **COURTROOM:** Chambers

COURT CLERK: Louisa Garcia

RECORDER:

REPORTER:

PARTIES PRESENT:

JOURNAL ENTRIES

- On February 28, 2020, a Motion to Withdraw as Counsel was filed by counsel for Defendant Best Floors Ltd. On March 18, 2020, an Opposition was filed by Plaintiff The EHH Venture, LLC. The matter was placed on Department XXXI's Chambers Calendar for April 17, 2020.

The Court is concerned that the "Motion" appears to be filed utilizing opposing counsel s letterhead and contains opposing counsel s name and contact information on the first page as well as the signature page. It is unclear if defense counsel had authorization to use Plaintiff s counsel letterhead but as presented the Motion does not comply with EDCR 7.20. In addition, the Motion does not include the contact information for Best Floors Ltd. as required by EDCR 7.40 and has several other procedural challenges as set forth in Plaintiff s Opposition. Moreover, given the pending outstanding Discovery Commissioner s Report and Recommendations Re: Judgment Creditor s Motion to Compel and for Sanctions, which was electronically signed by the Court, there are additional issues that need to be set forth in the Motion. Additionally, pursuant to EDCR 7.42, a corporate entity may not proceed in proper person, which is not stated in the Motion. Further, it is unclear whether the Motion was served on all parties. It is also unclear whether counsel represents both Defendants Dezfooli and Best Floor Ltd. and seeks to withdraw on behalf of both or only Best Floors. Finally, this matter was set for the Court s Chambers Calendar but the motion also sets forth that a hearing is

requested. Given the numerous procedural challenges, the Court finds it appropriate to Deny the Motion for inter alia the reasons set forth herein. A hearing would not alleviate the procedural issues or the letterhead issue and thus a determination in Chambers is appropriate. Accordingly, the Court Orders that the Motion to Withdraw is DENIED WITHOUT PREJUDICE.

This Decision sets forth the Court s intended disposition on the subject but anticipates further Order of the Court to make such disposition effective as an Order or Judgment. Such Order should set forth a synopsis of the supporting reasons proffered to the Court in briefing.

CLERK S NOTE: A copy of this minute order was distributed via the E-Service Master List. /lg 4-17-20

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**May 14, 2020**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

May 14, 2020 **9:00 AM** **Show Cause Hearing**

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

COURT CLERK: Louisa Garcia

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT: Shapiro, James E. Attorney

JOURNAL ENTRIES

- Mr. Shapiro argued in support of motion regarding non-compliance. Court finds there was notice of this hearing. Court stated its findings and ORDERED, Motion GRANTED. COURT FURTHER ORDERED, contempt hearing SET. Mr. Shapiro to prepare Order in accordance with EDCR 7.21.

6/2/20 9:00 AM CONTEMPT HEARING

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract **COURT MINUTES** **June 02, 2020**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

June 02, 2020 **10:00 AM** **Contempt Hearing** **Bond Set $500.00**

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

COURT CLERK: Louisa Garcia

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT: Shapiro, James E. Attorney

JOURNAL ENTRIES

- Court noted there were no appearances on behalf of Mr. Dezfooli or Best Floors. Court advised there was a Motion to Withdraw filed by counsel and it wrote a memo regarding its concerns/issues. Subsequently, the Motion was denied without prejudice. And then a second Motion to Withdraw as Counsel was filed and set for June 10th, noting there was no request to hear it on an order shortening time. Court advised it did not receive any notification asking the Motion to Withdraw to be advanced. Upon Court's inquiry, Mr. Shapiro stated he did not receive any notification either. Mr. Shapiro stated in addition to service on Defendant's counsel, he took the new order that had today's date and mailed it to Mr. Dezfooli's home address, as well as mailed it to the registered agent of Best Buy Flooring. Mr. Shapiro argued legal basis for contempt pursuant to NRS 22.010 and requested the Court find Defendant in contempt and issue a bench warrant.

COURT FINDS Defendants violated the Court's February Order and they have been noticed of all subsequent Orders to Show Cause and failed to appear. Court finds the standards in NRS 22.010 and NRS 22.100 have been met. COURT ORDERED Bench Warrant to ISSUE against Meelad Dezfooli and BOND SET in the amount of $500.00. Sanctions DEFERRED until after it is determined whether Defendants complied with the Bench Warrant. Mr. Shapiro to prepare Order.

CLERK'S NOTE: Minute Order amended to setting $500.00 Bond as to Meelad Dezfooli only, and not

Jose Bolanos. /lg 6-10-20

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**June 10, 2020**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

June 10, 2020	**9:00 AM**	**Motion to Withdraw as Counsel**	**Motion to Withdraw As Counsel of Record**

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

COURT CLERK: Louisa Garcia

RECORDER: Sandra Harrell

REPORTER:

PARTIES PRESENT:

Shapiro, James E.	Attorney
Whitehead, Jeffrey J, ESQ	Attorney

JOURNAL ENTRIES

- Court noted it signed the bench warrant and contempt order because of a pattern of conduct on behalf of Defendants. Court cited case law. Upon Court s inquiry, Mr. Whitehead stated he provided notice to his client at his last known address. Mr. Shapiro deferred the matter to the Court. Court noted the only opposition was a procedural opposition. Based on representations, COURT ORDERED, Motion to Withdraw GRANTED. Mr. Whitehead to prepare Order in accordance with EDCR 7.21. COURT FURTHER ORDERED, matter SET for status check.

7/9/20 9:00 AM STATUS CHECK: CORPORATE COUNSEL

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract **COURT MINUTES** **December 08, 2020**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

December 08, 2020 9:00 AM Motion

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

COURT CLERK: Alice Jacobson

RECORDER: Patti Slattery

REPORTER:

PARTIES PRESENT:

Dezfooli, Meelad M	Defendant
Shapiro, James E.	Attorney

JOURNAL ENTRIES

- Mr. Shapiro argued the police would not execute on a $500.00 bond and requested an increase to $50,000.00 for Defendant's non compliance with the judicial process under NRS 22.100.

Opposition by Mr. Dezfooli. Argument that he did not have money to a pay.

Court does not find any evidence of hardship; no payment had been made on the Judgment; there has been no attempt to comply; it was becoming a pattern; and under the totality of the circumstances. COURT ORDERED, motion GRANTED; Bail INCREASED to $10,000.00.

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**March 02, 2021**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

March 02, 2021 **9:00 AM** **Bench Warrant Return**

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

COURT CLERK: Natalie Ortega

RECORDER: Lara Corcoran

REPORTER:

PARTIES PRESENT:

Hinds, Cristina A.	Attorney
Shapiro, James E.	Attorney

JOURNAL ENTRIES

- Ms. Hinds advised she spoke with Mr. Dezfooli and he indicated he would be able to comply with the outstanding request and would need time to turn over to Plaintiff. Mr. Shapiro noted that the Discovery request dates were from 2019 and would need to be updated. He could e-serve the Discovery request with the updated dates by the end of the day. Then Defendant would be allowed two weeks to provide a response, thereafter, a status check date was requested. Ms. Hinds noted she had not worked with Defendant previously and would require at least three weeks or thirty days to respond. Upon Court's request, Ms. Hinds advised Defendant indicated he posted the bond through a bonding company. Mr. Shapiro requested that if any money was to be returned to Defendant that it should be turned over to Plaintiff and applied to the judgment. COURT ORDERED, Mr. Shapiro's request GRANTED. COURT FURTHER ORDERED, the Bench Warrant portion CLOSED. COURT ADDITIONALLY ORDERED, Discovery response due twenty-one (21) days from the date Mr. Shapiro e-serves. COURT ORDERED, Status Check SET and NOTED if the parties wished to vacate the hearing then they should submit a joint letter or a stipulation no less than twenty-four hours prior to the scheduled hearing.

03/30/21 9:00 AM STATUS CHECK

DISTRICT COURT
CLARK COUNTY, NEVADA

Other Contract	**COURT MINUTES**	**September 19, 2023**

A-16-746034-C EHH Venture LLC, Plaintiff(s)
vs.
Meelad Dezfooli, Defendant(s)

September 19, 2023 9:00 AM All Pending Motions

HEARD BY: Kishner, Joanna S. **COURTROOM:** RJC Courtroom 16B

COURT CLERK: Stephanie Rapel

RECORDER: Lara Corcoran

REPORTER:

PARTIES PRESENT:

Hinds, Cristina A.	Attorney
Shapiro, James E.	Attorney

JOURNAL ENTRIES

- MOTION TO RELEASE BOND... OPPOSITION TO MOTION TO RELEASE BOND AND COUNTERMOTION FOR RELEASE OF BOND TO PLAINTIFF PURSUANT TO THIS COURT'S MARCH 5, 2021 ORDER

Upon Court's inquiry, Ms. Hinds provided a brief background history of the case and argued Mr. Manouchehr Dezfooli posted the bond in Justice Court on behalf of his son, the Defendant. Ms. Hinds argued the Judgment had been satisfied according to the Court's records and there was nothing specific in the Contempt Order which allowed a Judgment Creditor to take money posted by a third party. Colloquy regarding Partial Satisfaction of Judgment (Doc 167). Mr. Shapiro stated the Order was issued after Defendant was found to be numerous times in contempt. Mr. Shapiro provided a brief background history of the case and referenced the March 5, 2021 Order attached as an exhibit to his Countermotion. Mr. Shapiro argued Mr. Manouchehr Dezfooli only provided evidence he posted the bond, not that he paid it, and regardless, the Order required the bond be turned over to Plaintiff and applied to the outstanding judgment. Mr. Shapiro stated the outstanding judgment had not been satisfied as evidenced by the partial satisfaction of judgment. Furthermore, Plaintiff agreed to accept less than the full judgment from Meelad Dezfooli / Best Floors, LTD. and the bond should be turned over to Plaintiff. Counsel confirmed in 2021 it was not represented to the

Court the bond was posted by someone other than Defendant. Court stated its Findings and ORDERED Defendant's Motion to Release Bond DENIED and Plaintiff's Countermotion for Release of Bond to Plaintiff Pursuant to this Court's March 5, 2021 Order GRANTED. COURT DIRECTED Mr. Shapiro to prepare the Order with detailed Findings of Fact and Conclusions of Law, circulate to opposing counsel, submit to the Court pursuant to EDCR 7.21 and the current Administrative Orders and cite to and attach the March 5, 2021 Order.

A746034

EXHIBIT LOG

DATE: November 2, 2017

Exhibit	THE EHH VENTURE LLC, a Nevada limited liability company, Plaintiff, vs. MEELAD DEZFOOLI, an individual; JOSE BOLANOS, an individual; and DOES 1-10, and ROE ENTITIES 1-10, inclusive, Defendants. THE EHH VENTURE LLC, a Nevada limited liability company, Plaintiff, vs. BEST FLOORS LTD DBA BEST BUY FLOORING, a Nevada limited liability company; and DOES 1-10, and ROE ENTITIES 1-10, inclusive, Defendants.	

Offered	Admitted	Exh. #	Identification / Date	Description	Offers Objections Rulings Exceptions	Stipd.	Authentication by:
11/2/17	11/2/17	1		1621 Lease	Y		
11/2/17	11/2/17	2		1631 C105-106 Lease	Y		
11/2/17	11/2/17	3		2016 Cam Statement	N		
		4		Notice of Cam Increase			
11/2/17	11/2/17	5		Letter to John Thomson dated March 31, 2017	N		
11/2/17	11/2/17	6		Court's February 23rd Order	Y		
11/2/17	11/2/17	7		March 2017 Original Check	N		
11/2/17	11/2/17	8		April 2017 Original Check	N		
11/2/17	11/2/17	9		April 2017 NSF Payment	N		
11/2/17	11/2/17	10		Letter to John Thompson, Meelad Dezfooli and Jose Bolanos dated April 21, 2017	N		

11/2/17	11/2/17	11		June 2017 Original Checks & Envelope	N		
11/2/17	11/2/17	12		June 2017 NSF Payment	N		
11/2/17	11/2/17	13		Letter to John Thomson dated June 14, 2017	N		
		14		June 2017 Wells Fargo Letter & Replacement Check			
		15		Letter from John Thompson to Jim Shapiro dated June 19, 2017			
		16		Letter to John Thompson dated June 22, 2017			
		17		Receipt of Checks (June Replacement Checks)			
11/2/17	11/2/17	18		June 2017 Original Checks	N		
		19		Letter to John Thomson dated July 3, 2017			
11/2/17	11/2/17	20		July 2017 Cashier's Check ($8,962.70)	N		
11/2/17	11/2/17	21		July 2017 Cashier's Check ($270.76)	N		
11/2/17	11/2/17	22		August 2017 Original Checks	N		
		23		Forged Addendum			
		24		Letter to John Thomson dated August 8, 2017			
11/2/17	11/2/17	25		August 2017 Cashier's Checks	N		
11/2/17	11/2/17	26		September 2017 Cashier's Checks	N		
11/2/17	11/2/17	27		October 2017 Checks	N		
11/2/17	11/2/17	28		Current Amount Owed	Y		
		29		Affidavit of Attorney Fees (OSC)			
		30		Affidavit of Attorney Fees (Continuance)			
11/2/17	11/2/17	31		LEASE ADDENDUM EMAIL	N		
11/2/17	11/2/17	32		ADDENDUM TO LEASE	N		
11/2/17	11/2/17	33		EMAIL FROM JOSEPH LEE	N		
		34					
		35					

EXHIBIT(S) LIST

Case No.: A-16-746034-C

Dept. No.: XXXI

Plaintiff: THE EHH VENTURE LLC,

vs.

Defendant: MEELAD DEZFOOLI

Bench Trial Date: 7/11/19

Judge: Joanna S. Kishner

Court Clerk: Susan Botzenhart

Recorder: Sandra Harrell

Counsel for Plaintiff: James E. Shapiro

Counsel for Defendant: Gary B. Burnett

BENCH TRIAL BEFORE THE COURT

PLAINTIFF'S EXHIBITS

Exhibit Number	Exhibit Description	Date Offered	Objection	Date Admitted	
1.	Declaration of Joseph Lee				WA
2.	Shopping Center Lease	7-11-19	no	7-11-19	WA
3.	Shopping Center Lease	7-11-19	no	7-11-19	WA
4.	Copies of six checks	7-11-19	no	7-11-19	WA
5.	Default of Defendant Jose Bolanos				WA
6.	Order on show cause Application				WA
7	Cam Statement	7-11-19	no	7-11-19	WA
8.	Letter to Mr. Thomson				WA
9.	Payment Ledger				WA
10.	Returned Check	7-11-19	no	7-11-19	WA
11.	Returned Check	7-11-19	no	7-11-19	WA
12.	Letter to Mr. Thomson	7-11-19	no	7-11-19	WA
13.	Copies of two checks				WA
14.	Copies of Two Checks				WA
15.	Order on Second Renewed show cause Application				WA
16.	Order				WA

EXHIBIT(S) LIST

The EHH Venture LLC vs. Meelad Dezfooli

PLAINTIFF'S EXHIBITS

Exhibit Number	Exhibit Description	Date Offered	Objection	Date Admitted	
17.	letter to Mr. Dezfooli + mr. Bolanos				
18.	Rent Payment Notice				
19.	Statement	7-11-19	no	7-11-19	
20.	Affidavit of Attorneys' fees	7-11-19	no	7-11-19	
21.	Memorandum of Costs	7-11-19	no	7-11-19	
22.	Notice of Compliance				
23.	Noticeof Posting cash in lieu of Bond				
24.	Invoice	7-11-19	no	7-11-19	
25.	Invoice	7-11-19	no	7-11-19	
26.	Invoice	7-11-19	no	7-11-19	
27.	Invoice	7-11-19	no	7-11-19	
28.	Listof amounts sought	7-11-19	no	7-11-19	
29.	Balance sheet				

EIGHTH JUDICIAL DISTRICT COURT CLERK'S OFFICE

NOTICE OF DEFICIENCY

ON APPEAL TO NEVADA SUPREME COURT

MANOUCHER DEZFOOLO
2074 TROON DR.
HENDERSON, NV 89074

DATE: November 1, 2023
CASE: A-16-746034-C
C/W A-16-748846-C

RE CASE: THE EHH VENTURE LLC vs. MEELAD DEZOOLI; JOSE BOLANOS

NOTICE OF APPEAL FILED: October 30, 2023

YOUR APPEAL HAS BEEN SENT TO THE SUPREME COURT.

PLEASE NOTE: DOCUMENTS **NOT** TRANSMITTED HAVE BEEN MARKED:

☒ $250 – Supreme Court Filing Fee (Make Check Payable to the Supreme Court)**
- If the $250 Supreme Court Filing Fee was not submitted along with the original Notice of Appeal, it must be mailed directly to the Supreme Court. The Supreme Court Filing Fee will not be forwarded by this office if submitted after the Notice of Appeal has been filed.

☐ $24 – District Court Filing Fee (Make Check Payable to the District Court)**

☒ $500 – Cost Bond on Appeal (Make Check Payable to the District Court)**
- NRAP 7: Bond For Costs On Appeal in Civil Cases
- *Previously paid Bonds are not transferable between appeals without an order of the District Court.*

☐ Case Appeal Statement
- NRAP 3 (a)(1), Form 2

☐ Order

☐ Notice of Entry of Order

NEVADA RULES OF APPELLATE PROCEDURE 3 (a) (3) states:

"The district court clerk must file appellant's notice of appeal despite perceived deficiencies in the notice, including the failure to pay the district court or Supreme Court filing fee. The district court clerk shall apprise appellant of the deficiencies in writing, and shall transmit the notice of appeal to the Supreme Court in accordance with subdivision (g) of this Rule with a notation to the clerk of the Supreme Court setting forth the deficiencies. Despite any deficiencies in the notice of appeal, the clerk of the Supreme Court shall docket the appeal in accordance with Rule 12."

Please refer to Rule 3 for an explanation of any possible deficiencies.

***Per District Court Administrative Order 2012-01, in regards to civil litigants, "...all Orders to Appear in Forma Pauperis expire one year from the date of issuance." You must reapply for in Forma Pauperis status.*

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; AMENDED CASE APPEAL STATEMENT; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET; ORDER: (1) DENYING MANOUCHER DEZFOOLI'S MOTION TO RELEASE BOND; AND (2) GRANTING THE EHH VENTURE, LLC'S COUNTERMOTION FOR RELEASE OF BOND TO PLAINTIFF PURSUANT TO THIS COURT'S MARCH 5, 2021 ORDER; NOTICE OF ENTRY OF ORDER; DISTRICT COURT MINUTES; EXHIBITS LIST; NOTICE OF DEFICIENCY

THE EHH VENTURE LLC,

Plaintiff(s),

vs.

MEELAD DEZOOLI; JOSE BOLANOS,

Defendant(s),

Case No: A-16-746034-C
Consolidated with A-16-748846-C
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 1 day of November 2023.

Steven D. Grierson, Clerk of the Court

Cierra Borum, Deputy Clerk