

6 DISTRICT COURT  
7 CLARK COUNTY, NEVADA

8 YVES GHIAI-CHAMLOU,  
9 Plaintiff,

Case No.: A-18-777196-C  
Dept. No.: XXII

10 vs.

11 RELIANT TITLE USA, LLC; HORIZON  
12 REALITY GROUP, LLC; BERKSHIRE  
13 HATHWAY HOMESERVICES NEVADA;  
DOES I through XXX, inclusive, and ROE  
BUSINESS ENTITIES I through X, inclusive,

14 Defendant.

15  
16 CASE APPEAL STATEMENT

17 YVES GHIAI-CHAMLOU, by and through his attorney, LEO P. FLANGAS, ESQ., hereby  
18 files his Case Appeal Statement.

- 19 1. Name of Appellants filing this case appeal statement: YVES GHIAI-CHAMLOU  
20  
21 2. Identify the Judge issuing the decision, judgment, or order appealed from: The  
22 Honorable Susan H. Johnson, District Court Judge.  
23 3. Identify each appellant and name and address of counsel for each appellant:  
24 YVES GHIAI-CHAMLOU, Appellant, and is represented on appeal by LEO P. FLANGAS, ESQ.,  
25 600 S. Third Street, Las Vegas, NV 89101. (702) 384-1990.  
26 4. Identify each Respondent and name and address of appellate counsel, if known, for each  
27  
28

4 Vegas, Nevada 89117, Telephone: (702) 888-0000 and J. DANIEL WEIDNER, ESQ., *pro hac vice*  
5 KOLEY JESSEN, P.C., L.L.O., 1125 South 103<sup>rd</sup> Street, Ste. 800, Omaha, NE 68124, (402)390-9500  
6 Appellant's counsel believes the same attorneys will represent respondent on appeal.

7  
8 5. Indicate whether any attorney identified above in response to questions 3 or 4 is not  
9 licensed to practice law in Nevada and, if so, whether the district court granted that attorney permission  
10 to appear under SCR 42 (attach a copy of any district court order granting such permission): As noted  
11 J. DANIEL WEIDNER, ESQ., *pro hac vice*, KOLEY JESSEN, P.C., L.L.O., 1125 South 103<sup>rd</sup> Street  
12 Ste. 800, Omaha, NE 68124, (402)390-9500. (See attached)

13  
14 6. Indicate whether appellant was represented by appointed or retained counsel in the  
15 district court: Represented by retained counsel.

16  
17 7. Indicate whether appellant is represented by appointed or retained counsel on appeal:  
18 Represented by retained counsel

19  
20 8. Indicate whether appellant was granted leave to proceed in forma pauperis and the date  
21 of entry of the district court order granting appellant permission: Appellant did not request to proceed  
22 in forma pauperis and therefore there is no order.

23  
24 9. Indicate the date the proceeding commenced in district court: The Complaint was  
25 filed on July 5, 2018.

26  
27 10. Provide a brief description of the nature of the Action and result in the district court,  
28 including the type of judgment or order being appealed and the relief granted by the district court:  
Respondent, Reliant Title, who shared office space with Defendant, Horizon, failed to protect the  
pending real estate sale either from employees or others which resulted in Appellant's funds of  
\$160,000.00 being stolen. The District Court dismissed Reliant Title because it determined there was

4 2020; Order for Motion for Reconsideration entered June 19, 2020.

5 11. Indicate whether the case was previously the subject of an appeal to or original writ  
6 proceeding in the Supreme Court and, if so, the caption and Supreme Court docket number of the prior  
7 proceeding: There was no prior appeal filed in Supreme Court.

8 12. Indicate whether this appeal involves child custody or visitation: This case does not  
9 involve child custody or visitation.

10 13. If this is a civil case, indicate whether this involves the possibility of settlement:  
11 Settlement is worth pursuing.

12 Dated this 22 day of October, 2021.

13  
14  
15 /s/ Leo P. Flangas  
16 FLANGAS CIVIL LAW FIRM, LTD.  
17 LEO P. FLANGAS, ESQ  
18 Nevada Bar No. 5637  
19 600 S. 3<sup>rd</sup> Street  
20 Las Vegas, NV 89101  
21 Phone: (702) 384-1990  
22 E-mail: leo@flangaslawfirm.com  
23 *Attorneys for Petitioners*  
24  
25  
26  
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4 was made upon each of the following persons via the Odyssey E-Filing System pursuant to NRCF

5  
6 5(b)(2)(D) and EDCR 8.05:

7  
8 Jay Kenyon jay@yan-kenyon.com  
9 Kelsey Priest kelsey@yan-kenyon.com  
10 Daniel Weidner daniel.weidner@koleyjessen.com  
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/s/ Natasha Smith  
An employee of FLANGAS LAW FIRM, LTD.

5 Fax: 702.888.0011  
6 [jay@yan-kenyon.com](mailto:jay@yan-kenyon.com)

7 J. Daniel Weidner, *admitted pro hac vice*  
8 (Bar No. 23738 NE)  
9 Koley Jessen, P.C., L.L.O.  
10 1125 South 103rd Street, Suite 800  
11 Omaha, NE 68124  
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12 *Attorneys for Defendant RELIANT TITLE USA, LLC*

13 **DISTRICT COURT**  
14 **CLARK COUNTY, NEVADA**

15 YVES GHIAL-CHAMLOU,

16  
17 Plaintiff,

18 vs.


19 RELIANT TITLE USA, LLC,  
20 VERONICA MARTINEX, HORIZON  
21 REALTY GROUP, LLO, DOES 1 through  
22 XXX, inclusive, and ROE BUSINESS  
23 ENTITIES 1 though X, inclusive,

Defendants.

Case No.: A-18-777196-C

Dept. No.: 22

**ORDER ADMITTING <sup>TO</sup> PRACTICE**

24  Yan Kenyon  
25 7881 W.  
26 Charleston Blvd.  
27 Suite 165  
28 Las Vegas, NV  
89117

24 **J. Daniel Weidner, Esq.** having filed his Motion to Associate Counsel under  
25 Nevada Supreme Court Rule 42, together with a Verified Application for Association of  
26 Counsel, a Certificate of Good Standing for the states of Nebraska and Iowa, and the  
27  
28

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