

IN THE SUPREME COURT OF THE STATE OF NEVADA

YVES GHIAI-CHAMLOU,

Appellant,

vs.

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

Respondent.

Electronically Filed
Nov 10 2021 10:44 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

No. 83635

MOTION TO DISMISS

YAN KENYON

Jay Kenyon (NSBN 2367)
7881 W. Charleston Blvd., Suite 165
Las Vegas, Nevada 89117
(702) 888-0000
jay@yan-kenyon.com

KOLEY JESSEN, P.C., L.L.O.

J. Daniel Weidner, *pro hac vice* (Bar No. 237389 NE)
1125 South 103rd Street, Suite 800
Omaha, Nebraska 68124
(402) 390-9500
daniel.weidner@koleyjessen.com

McDONALD CARANO, LLP
Rory T. Kay (NSBN 12416)
Jane Susskind (NSBN 15099)
2300 W. Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
(702) 873-4100
rkay@mcdonaldcarano.com
jsusskind@mcdonaldcarano.com

Attorneys for Respondent, Reliant Title USA, LLC

NRAP 26.1 DISCLOSURE STATEMENT

Pursuant to NRAP 26.1, the undersigned counsel of record certifies that the following are persons and entities as described in NRAP 26.1(a) and must be disclosed. These representations are made in order that the justices of the Supreme Court and the judges of the Court of Appeals may evaluate possible disqualification or recusal.

Respondent Reliant Title USA, LLC (“Respondent” or “Reliant Title”) has no parent corporation and no publicly held company owns 10% or more of Reliant Title.

The following law firms have lawyers who appeared for Reliant Title in the case or are expected to appear on its behalf in this Court:

(1) Yan Kenyon, (2) Koley Jessen, P.C., L.L.O. and (3) McDonald Carano LLP.

Dated: November 10, 2021.

MCDONALD CARANO LLP

By: /s/ Rory T. Kay
Rory T. Kay (NSBN 12416)
2300 W. Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102

YAN KENYON
Jay Kenyon (NSBN 2367)
7881 W. Charleston Blvd., Suite 165
Las Vegas, NV 89117

KOLEY JESSEN, P.C., L.L.O.
J. Daniel Weidner, *pro hac vice*
(Bar No. 23738 NE)
1125 South 103rd Street, Suite 800
Omaha, Nebraska 68124

*Attorneys for Respondent, Reliant
Title USA, LLC*

INTRODUCTION

On January 28, 2021, the district court entered a civil order to statistically close this case based on a stipulated dismissal. Shortly thereafter, this matter was fully resolved on February 27, 2021, when the district court entered a Stipulated Judgment against the final defendant remaining in the case. However, instead of filing a Notice of Entry of Order within 14 days as required by NRCP 58 (e)(1), Appellant Yves Ghiai-Chamlou (“Ghiai-Chamlou”) did not file his Notice of Entry of Order related to the final Stipulated Judgment until 205 days after the district court signed the Stipulated Judgment. In his Notice of Appeal, Ghiai-Chamlou attempts to misdirect the court when he states, “[t]his matter became ripe for Appeal upon Notice of Entry of the September 10, 2021, Stipulated Judgment Against Horizon Realty Group, LLC (“Horizon”) resolving all remaining claims of all parties.” Had Ghiai-Chamlou complied with NRCP 58(e)(1), which requires a party to file a notice of entry within 14 days of judgment, the last day this matter could have been appealed was April 2, 2021. In other words, Ghiai-Chamlou filed his notice of appeal 188 days late.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.