



NEVADA Legal Update

Summer 2020

HIGHLIGHTS

Cannabis Business Consultant Recovered Almost \$3 Million in Fees Owed From Breached Licensing Agreement

A Cannabis grower breached a five-year licensing agreement for consultation services and discounted nutrient supplies, resulting in damages of over \$3.5 million in unpaid fees. Despite the grower's claim that the consultation services resulted in sub-standard yields, Plaintiff was awarded \$2,773,320.87 in damages for unpaid fees.

No Monetary Damages Awarded Despite a Finding That Defendant Was Negligent

Plaintiff homeowners sued their neighborhood's security service for permitting squatters to occupy Plaintiffs' home for over one month. Defendant claimed that Plaintiffs had prior business dealings with the squatters, which contributed to the damages. The jury found that Defendant had been negligent, but that Plaintiffs' actions had caused the monetary damages and no damages were awarded.

Auto Mechanic Awarded Nearly \$60,000.00 After Wrongful Termination

Plaintiff filed a worker's compensation claim after suffering a partial amputation of his thumb. He was subsequently terminated and several personal items were not returned to him. Defendant claimed Plaintiff was fired for behavioral reasons. The jury awarded Plaintiff \$56,000.00 in lost wages and over \$3,000.00 for his lost property.

NEVADA SUPREME COURT DECISIONS

DEFAMATION

Nevada Supreme Court Upholds an Individual's Right to Free Speech on Email Listservs When Statements Were Made in the Public Interest and in Good Faith

Jennifer Abrams and Louis Schneider were opposing counsel in a family law case and Mr. Schneider allegedly gave a video of a closed-court hearing in that case to Steve Sanson, president of the Veterans in Politics International. Mr. Sanson then published the video on his group's website and sent out multiple articles to the group's listserv criticizing the judiciary and Ms. Abrams' courtroom conduct and practices.

In a subsequent telephone conversation, a representative of Ms. Abrams asked Mr. Sanson to remove the videos or at least blur her face and Mr. Sanson reportedly responded with negative comments about Ms. Abrams. Ms. Abrams then filed a complaint against both Mr. Sanson and Mr. Schneider alleging defamation, intentional infliction of emotional distress, false light, and other causes of action.

Mr. Sanson and Mr. Schneider filed separate anti-SLAPP special motions to dismiss pursuant to NRS. 41.660. The district court granted the motions, finding that Mr. Sanson met his initial burden because (1) the statements involved issues of public concern relating to an attorney or professional's performance of a job or the public's interest in observing justice; (2) the statements were made in a public forum on a publicly accessible website, and republishing them by email did not remove them from a public forum; and (3) the statements were either true or statements of opinion incapable of being false. In regard to Mr. Schneider specifically, the district court held that he did not directly make any of the

statements at issue and should not be held liable.

Ms. Abrams appealed and the Nevada Supreme Court reviewed the district court's decision de novo. A special motion to dismiss under Nevada's anti-SLAPP statute should be granted where the defendant shows by a preponderance of the evidence that the claim was based upon a good-faith communication in furtherance of the right to petition or the right to free speech regarding a matter of public concern, NRS 41.600(3)(a), and the plaintiff cannot show with "prima facie evidence a probability of prevailing on the claim." NRS 41.660(3)(b); *Shapiro v. Welt*, 133 Nev. 35, 37, 389 P.3d 262, 267 (2017).

A good-faith communication in furtherance of the right to free speech regarding a matter of public concern includes any communication that is (1) "made in direct connection with an issue of public interest," (2) "in a place open to the public or in a public forum," and (3) "which is truthful or is made without knowledge of its falsehood." NRS 41.637(4). In this case, statements about an attorney's courtroom conduct and practice of sealing cases directly connect to an issue of public interest thus satisfying the first prong of the good-faith communication test.

The Nevada Supreme Court also

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determined Mr. Sanson's email listserv was a public forum because it contained nearly 50,000 subscribers, many of whom did not know each other. In addition, this listserv acted similarly to listeners who subscribed to radio or television broadcast or newsletters, which were mediums of communication that share contemporaneously perceptible images or sounds to large groups of people. As a result, Mr. Samson's listserv was a "vehicle for communicating a message about public matters to a large and interested community" and the Nevada Supreme Court made it clear that listservs were a medium through which public matters were disseminated. Mr. Sanson's listserv acted as a public forum for purposes of the anti-SLAPP statutes and satisfied the second prong of the good-faith communication test.

The court briefly addressed the private telephone conversation between Mr. Sanson and Ms. Abrams' representative and held that a private telephone conversation did not constitute a public forum. As a result, those statements did not fall within the scope of the anti-SLAPP statutes and should not be protected. The Nevada Supreme Court therefore reversed the district court's judgment regarding comments made during the private telephone call.

Finally, the Nevada Supreme Court determined that Mr. Sanson's statements were either truthful or statements of opinion incapable of being false. Mr. Sanson quoted parts of the video tape which showed the actual court proceedings and there were no signs of deceptive edits or changes to the original film. The remaining comments were based on Mr. Sanson's opinions, which were not knowingly false and were merely personal views and criticisms of Ms. Abrams' courtroom behavior. Because these opinions addressed public matters stated in a public forum they constituted good-faith communications under Nevada's anti-SLAPP statutes and the final prong of the good-faith communication test was met.

The Nevada Supreme Court further concluded that Ms. Abrams did not prove with prima facie evidence a probability of prevailing on her claims and affirmed the district court's

judgment regarding the comments made on the listserv. *Abrams v. Sanson*, March 5, 2020.

MEDICAL MALPRACTICE

Nevada Supreme Court Clarifies the Standard for Holding Surgeons Liable for Failure to Remove Foreign Objects during an At-Issue Removal Surgery

In 2013, Defendant Dr. Annabel Barber implanted a gastric stimulator into Plaintiff Melissa Cummings's stomach to treat her gastroparesis. In 2014, Defendant surgically removed Plaintiff's gastric stimulator, but failed to remove the surgical clips and wire fragments she used during her previous surgery. Three years following the removal of the gastric stimulator, Plaintiff underwent an appendectomy and the surgeon found and removed wire fragments from Plaintiff without difficulty.

Plaintiff filed a claim for medical malpractice against Defendant Barber and University Medical Center for breach of the professional standard of care. Plaintiff noted that Defendant either overlooked or unintentionally left surgical clips in Plaintiff's body. Plaintiff did not include a medical expert affidavit in her complaint. Under Nevada's *res ipsa loquitur* provision, medical expert testimony is not required and there is a rebuttable presumption that the personal injury or death was caused by negligence when evidence is presented that a foreign substance was unintentionally left within the body of a patient following surgery. NRS 41A.100(1)(a).

In her response pleading, Defendant provided an expert report which explained that Defendant's choice to leave the wire fragments in place was not negligent due to the difficulty of removing the fragments. Defendant therefore argued that Plaintiff could not establish the facts that gave rise to presumption of negligence and could not establish negligence without expert testimony. Plaintiff did not retain an expert to refute Defendant's expert and Defendant filed a motion for summary judgment which was granted by the district court.

The Nevada Supreme Court disagreed with the district court's interpretation of the statute, which the Court found conflicted with

the plain meaning of the statute. The district court's interpretation precluded application where the sole purpose of a surgery was removal of a medical device implanted in a previous surgery. The Court reasoned that a jury could conclude based on common knowledge that the surgeon's failure to remove all related hardware used during the previous surgery constituted negligence.

The Court also declined to adopt Plaintiff's interpretation because Plaintiff attempted to extend the statute to apply to foreign objects implanted or used during any previous surgery, even when the purpose of the later surgery was not to remove a previously implanted device. The Court noted Plaintiff's interpretation was inconsistent with the legislature's intent because surgeons do not have the affirmative duty to discover foreign objects implanted by a different surgeon in an unrelated procedure. The Nevada Supreme Court concluded that application of NRS 41A 100.1(a) applied to foreign objects implanted or used during an at-issue surgery and foreign objects implanted or used during a previous surgery where the purpose of the at-issue surgery was removal of those foreign objects.

In reviewing Defendant's motion for summary judgment, the Court noted that Defendant's own surgical report did not mention that she intentionally left wires in Plaintiff's stomach due to risks involved in removal. Rather, she noted that she had no difficulty removing the wires, which arguably negated Defendant's argument. The Court concluded that the district court erred in granting Defendant's motion for summary judgment and reversed and remanded the case for further proceedings. *Cummings v. Barber*, April 2020.

NEVADA JURY VERDICTS

PERSONAL INJURY

Jury Questions Cause of Plaintiff's Injuries and Finds for Defendant

While recovering from surgery, Plaintiff

was staying at Defendant AMG Specialty Hospital. When Plaintiff attempted to sit in a geriatric chair provided for her, she fell to the floor allegedly tearing her rotator cuff. Plaintiff argued that the geriatric chair provided by the Defendant's physical therapists failed to function properly, that Defendant was negligent in maintaining its equipment, and that Defendant did not post appropriate warning signs to prevent harm and acknowledge the possible dangers involved with said chair. Plaintiff sought compensatory damages plus the medical expenses she would expend for the surgical repair of her rotator cuff.

Defendant denied liability, arguing that the geriatric chair did not present an obvious danger to the Plaintiff, or any of Defendant's other patients. Defendant further argued that the Plaintiff was comparatively at fault and that there was no evidence Plaintiff's alleged injuries were caused by the subject incident. The jury returned a verdict for Defendant. *Lewis v. Las Vegas AMG Specialty Hospital, L.L.C.*, June 7, 2019.

Arbitration Appeal Results in Defense Verdict

Plaintiff Rodarte was driving a Dodge Charger with Plaintiff Rivera and Plaintiff Rivera-Reyes as passengers. While stopped at a traffic light, Plaintiffs were rear-ended by Defendant. In the arbitration case that followed, Plaintiff Rodarte was awarded \$17,832, Plaintiff Rivera was awarded \$6,577, and Plaintiff Rivera-Reyes was awarded \$9,128. Defendant appealed the arbitration decision, admitting liability but arguing that Plaintiffs' injuries were not caused by the subject incident. Defendant specifically argued that he was travelling at such a minimal speed at the time of the collision that the arbitration awards were inflated and could not possibly reflect the actual damages incurred.

Plaintiffs allegedly sustained back and soft tissue injuries, and one Plaintiff claimed that the collision aggravated a previous ankle injury. Plaintiffs' experts testified that the alleged injuries were causally related to the collision. Defendant's experts, a physician and an accident reconstructionist, both testified that no substantial injury could have been

sustained based on the forces of the impact.

During closing arguments, Plaintiffs asked the jury to award three times the alleged medical expenses. Defendant maintained that no property damage occurred and the Plaintiffs were not injured. The jury found unanimously for Defendant. *Rodarte, Rivera, & Rivera-Reyes v. Esteban*, June 7, 2019.

Experts Dispute Force and Damage Resulting from a Parking Lot Collision

Plaintiff, a bartender, alleged that Defendant, employed in customer service, negligently backed out of her parking space while Plaintiff was attempting to make a wide turn into an adjacent parking spot, causing a collision. Plaintiff alleged that the impact caused him to sustain a herniated lumbar disk. Defendant denied liability and argued that she barely took her foot off the brake pedal when her vehicle struck Plaintiff's vehicle. Defendant maintained that Plaintiff's alleged injuries were not causally related to the incident.

Plaintiff's expert, an orthopedic physician, opined that the injury was causally related to the impact, and that his treatment was reasonable and necessary. He further testified that Plaintiff required a future microdiscectomy at a cost of \$120,000. Defendant relied on the testimony of a biomechanical engineer and orthopedic physician. The engineer maintained that Defendant's vehicle was barely moving or not moving at all, and the force generated by the impact could not have caused the injuries claimed by Plaintiff. Defendant's expert specifically opined that the forces involved in the collision would have been less than those experienced in standing up from a chair. Defendant's medical expert opined that Plaintiff sustained only a lumbar strain and sprain and future surgery was not required.

Prior to trial, Plaintiff served a \$74,000 offer of judgment, and Defendant offered \$30,000. At trial, Plaintiff sought damages, including \$120,000 in future medical expenses. After a seven-day trial, the jury found for Plaintiff and awarded \$270,000 in damages, including \$120,000 in future medical expenses, \$70,000 for past pain and suffering, and \$80,000 for future pain and suffering. *Collazo*

v. Leano, June 21, 2019.

MEDICAL MALPRACTICE

Physician Liable for Failing to Remove Fifty-Seven Inch Metal Wire from Plaintiff's Body

On June 17, 2005, Defendant, who was assisted by non-party cardiology consultant, performed a left heart catheterization and angiogram on Plaintiff. During the angiogram, Defendant placed a catheter in Plaintiff's right femoral artery and performed an angiography. The catheter was subsequently exchanged for a pigtail catheter. The catheter was then removed and the procedure was completed. Plaintiff was diagnosed with congestive heart failure, new onset, improved; and dilated cardiomyopathy, status post cardiac catheterization. Plaintiff was discharged from the hospital on June 20, 2005.

Nearly ten years later, on April 18, 2015, Plaintiff presented to University Medical Center with breathing difficulty and shortness of breath. Plaintiff's chest x-ray revealed a retained metallic wire device coursing along Plaintiff's thoracic aorta. The abdomen and chest x-ray revealed a fractured wire fragment extending along Plaintiff's abdominal aorta and right iliac vasculature. A CT scan of Plaintiff's abdomen indicated that the metallic wire extended from Plaintiff's chest to thigh.

Plaintiff filed suit alleging Defendant fell below the standard of care when he failed to ensure that the guide wire had been extracted along with the sheath and closure device when they were removed. University Medical Center and the cardiology consultant settled with Plaintiff prior to trial. Defendant denied liability.

Plaintiff alleged that as a result of Defendant's negligence, Plaintiff lived with a fifty-seven-inch metal wire in his body for ten years before it was discovered and removed. Plaintiff sought compensatory damages and his spouse sought damages for loss of consortium. After a seven-day trial, and three-plus hours of deliberation, the jury found Defendant to be ninety-seven percent at fault. Plaintiff was awarded \$1,405,500 in compensatory damages, which was reduced to \$1,363,335. Plaintiff's



spouse was awarded \$375,000.00 for loss of consortium, which was reduced to \$363,750.00. *Ortiz v. Taylor*, M.D., June 18, 2019.

BREACH OF CONTRACT

Unwritten Contract Determines House Ownership

Plaintiff and Defendant McCoy were involved in a romantic relationship and purchased a home together. Plaintiff, however, had an IRS federal tax lien against him, and could not qualify for a mortgage. Defendant Kroenke, mother of Defendant McCoy, agreed to assist in financing the house and paid the \$46,800 down payment on the property. The title was originally in Defendant's name, and was transferred to Defendant Kroenke's trust.

Plaintiff alleged breach of contract when his relationship with Defendant McCoy started to deteriorate and he and his daughter were evicted from the property. He argued that the parties entered into an agreement for a "straw purchase." Plaintiff specifically claimed that he intended to secure his own mortgage for the property once the lien with the IRS was resolved. Plaintiff also alleged that he paid all the closing costs, the monthly mortgage payment, the insurance, the homeowner association fees, maintenance and improvement costs.

Defendants denied all liability and argued that there was no agreement between the two parties, so no breach occurred. Defendant Kroenke maintained that she purchased the property with the understanding that the title would pass to Defendant McCoy on the death of Defendant Kroenke. Defendants also argued that Plaintiff was guilty of slander, conversion, and unjust enrichment.

The jury determined that Plaintiff was entitled to a 50% ownership interest in the property. Defendant McCoy was awarded \$37,109 for her counterclaim of conversion. *Lefferts v. Kroenke FamilyTrust, McCoy, & Kroenke*, August 6, 2019.

Plaintiff Awarded Almost \$3 Million in Cannabis Growth Consultant Case

Plaintiff, a consultant in the cannabis growing business, offered a proprietary program called Cultivation Max. This program aimed

to help cannabis growing businesses maximize their yield, consistency, quality, and efficiency. As part of Cultivation Max, Plaintiff provided several services, including site selection, training and support, on-site advisors, harvest projections, and staffing.

Defendant entered into Plaintiff's license agreement under the Cultivation Max program, agreeing to an upfront development fee of \$25,000, monthly reimbursements for the on-site advisor at \$10,000, and twenty-five percent of the defined property value. The agreement term was five years from the date of the first harvest after integration of Plaintiff's Cultivation Max Service. The agreement also granted Defendant a fifty percent discount for all nutrients purchased from Plaintiff.

Plaintiff alleged that Defendant failed to make payments as agreed and relied on the testimony of a forensic accountant, who opined that based on market trends and Defendant's prior cultivation efficiencies, the loss to Plaintiff was in excess of \$3,500,000. Defendant countered that Plaintiff's services resulted in sub-standard yields because the cannabis had seeded, which reduced its market value. Defendant therefore counterclaimed for monetary losses from substandard yields, but the Court dismissed those claims.

Plaintiff made a pre-trial demand of \$1,144,000, and Defendant offered \$150,000. After a five-day trial and three hours of deliberation, the jury unanimously awarded Plaintiff \$2,773,320.87 in compensatory damages. *Medicine Man Technologies, Inc. v. Vegas Valley Growers, L.L.C.*, August 6, 2019.

Jury Unanimously Finds for Plaintiff in Medical Marijuana Contract Lawsuit

In April of 2014, Plaintiff, a physician with over 30 years of experience, and Defendant entered into a contract regarding Defendant's applications for one or more licenses to operate a medical marijuana establishment, the Las Vegas Medical Clinic, also known as "CannaCopia." Plaintiff, a doctor who specialized in addiction medicine, was to be an advisory board member on Defendant's advisory board. Defendant was to pay Plaintiff \$10,000.00 for each license and/or registration certificate from the State

of Nevada, and \$10,000 per month for service on the advisory board. If Defendant was denied a license, the contract would be terminated. Defendant paid Plaintiff an initial fee of \$25,000 but made no further payments.

Plaintiff alleged that after Defendant received registration certificates from the State of Nevada to operate a dispensary, Defendant refused to make any payments due under the contract. Plaintiff also claimed that even if Defendant complied with the terms of the contract, Defendant breached the covenant of good faith and fair dealing when it deliberately contravened the intention and spirit of the contract. Plaintiff claimed Defendant received the use of Plaintiff's name, credentials, and reputation in obtaining its licenses and his availability as a resource in the event that he was called upon to provide advice or other feedback as a member of Defendant's advisory board.

Defendant denied liability, arguing that Plaintiff had been fully compensated for his services under the contract. Defendant argued that because the registration certificates were provisional and would not be final until Defendant complied with all applicable local governmental ordinances and/or rules, and because the local government issued a business license for the operation of the establishment, Plaintiff was not due any additional funds.

Plaintiff sought \$150,000 in compensatory damages and served a \$140,000.00 pretrial offer of judgment. Defendant refused to make an offer. After a three-day trial, the jury deliberated for less than one hour and unanimously awarded Plaintiff \$150,000. *Levy, D.O., v. LVMC, L.L.C.*, July 10, 2019

NEGLIGENCE

Jury Awards \$625,000 to Man Assaulted by Casino Security Guards

Plaintiff, a man in his early thirties, alleged that, while visiting the Defendant's hotel and casino, he was violently attacked by its security guards. He claimed that the guards used excessive force in removing him from the premises, resulting in torn shoulder ligaments which required surgical repair, as well as abrasions and bruising. Plaintiff

further claimed that the security guards lied to responding police officers, claiming that Plaintiff threatened to stab the security guards and attempting to portray Plaintiff as the original aggressor.

Plaintiff asserted a claim against the hotel and casino for negligent hiring, training, and supervision of Defendant's security guards. Plaintiff relied on the testimony of a security expert who opined that Defendant failed to comply with its own policies and procedures.

Defendant denied liability, asserting that Plaintiff must have threatened deadly force or challenged the security guards to a physical altercation, which justified the use of force. In support of its defense, Defendant relied on a security expert who testified that if the security guard's statements were true, their actions towards Plaintiff were justified.

Plaintiff served a \$249,999 pretrial offer of judgment; Defendant offered \$5,000. After a five-day trial and two hours of deliberation, the jury awarded Plaintiff \$625,000 in compensatory damages. Because it found Defendant to be seventy percent at fault and Plaintiff to be thirty percent at fault, Plaintiff's award was reduced to \$437,500. *Torres v. Wynn Las Vegas, L.L.C.*, August 30, 2019.

Plaintiffs Denied Damages Despite Finding that the Defendants Allowed Squatters to Live in Plaintiffs' Home

Plaintiffs, husband and wife, were part-time residents and owners of a single-family residence located within the boundaries of Defendant homeowners association. Plaintiffs chose the community because it had a gated entrance and was patrolled daily by Defendant Securitas Security Services. Defendant homeowners association and its manager sent invoices for the monthly association fees to Plaintiffs' address in California.

In August 2013, "squatters" broke into Plaintiffs' home and occupied it for over one month. The original squatter forged a "lease" which identified him as a tenant. The squatter held numerous loud parties on the pool deck and dock. Plaintiffs also found drug paraphernalia on the premises. When Plaintiffs returned to their property, they found the furniture was rearranged, smelled cigarette smoke, saw other

evidence that someone was occupying the house, and noted extensive damage to their home and personal belongings. The original squatter admitted that he, his spouse, and a group of friends broke into Plaintiffs' house by prying open a locked kitchen window after breaking and removing the screen.

Plaintiffs claimed that they were not aware of a problem until they saw their telephone bill with numerous extra charges for calls made to numbers unknown to the Plaintiffs. Plaintiffs alleged that Defendant Securitas Security Services was aware that the squatter was living in Plaintiffs' home, but failed to question his presence and failed to request identification. Plaintiffs further argued that Defendants had Plaintiffs' mobile telephone numbers, but failed to verify the purported "lease," in violation of Defendant homeowner association's covenants, conditions, and restrictions. Additionally, Plaintiffs alleged that the purported "lease" did not include any material terms or items that would normally be found in a lease summary or a perfunctory rental agreement. Finally, Plaintiffs alleged that Defendants gave out the gate code and gate key entry fobs so anyone could enter the premises at any time.

Plaintiffs argued that Defendants acted with malice and, as a result of Defendants' negligence, they suffered emotional trauma and will continue to struggle with the effects of the incident for the remainder of their lives. Plaintiffs specifically claimed that they suffered from nightmares, physical damage to their lungs from the smoke, and injury to other body parts due to manual labor required to restore the house. Plaintiffs also claimed extensive property damage. Defendants denied liability and alleged that Plaintiffs had prior business dealings with the squatter, and were at fault for the incident.

After a seven-day trial, the jury found Defendants were negligent and breached their duty to Plaintiffs. The jury also found, however, that Plaintiffs' own actions caused them to suffer monetary damages, and awarded Plaintiffs no damages. *Wiese v. First Service Residential Nevada, LLC*, August 7, 2019.

WRONGFUL TERMINATION

Auto Mechanic Awarded \$59,111.16 After Being Fired for Filing a Workers' Compensation Claim

Plaintiff worked for Defendant as an auto mechanic and was injured in an industrial accident. The injury required partial amputation of Plaintiff's thumb and Plaintiff subsequently filed a workers' compensation claim. Plaintiff alleged he was asked not to return to work and was not allowed to retrieve his personal property from Defendant's premises. Later, when Defendant did return Plaintiff's personal property, Plaintiff's laptop, stereo, and many personal tools were allegedly missing. Plaintiff then claimed that he was wrongfully terminated in retaliation for filing the workers' compensation claim.

Defendant denied liability and maintained that Plaintiff was not fired for filing a workers' compensation claim. Instead, Defendant alleged that, after the injury, Plaintiff was hostile and refused to pick up his belongings when a manager was present. In addition, Defendant alleged that Plaintiff failed to communicate his availability to work.

Plaintiff sought \$3,111.16 for conversion of property and \$56,000 in lost wages. After a five-day trial and four hours of deliberation, Plaintiff was unanimously awarded \$59,111.16 in compensatory damages. *Fitzgerald v. Hillsboro Enterprises*, July 19, 2019.

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NEVADA Legal Update

COMMENTS

On March 13, 2020, Nevada Governor Steve Sisolak declared a state of emergency in response to COVID-19. Since the March 2020 declaration, Governor Sisolak has published multiple Emergency Directives which have shutdown Nevada's schools and businesses in an attempt to stop the spread of the virus. Recently, in consideration of the decreasing number of COVID-19 cases, Governor Sisolak reopened certain establishments in Nevada.

Pursuant to Governor Sisolak's June 10, 2020, Declaration of Emergency Directive 023, Nevada citizens must continue their social distancing and sanitation efforts. Local governments may permit the usage of outdoor recreational

activities so long as it does not result in the gathering of fifty or more persons. Youth sports that promote contact may resume on a limited basis; however, athletes may not have physical contact with other players. The Governor also granted municipal governments the authority to adopt additional protective measures to combat the spread of COVID-19, so long as the adopted measures were no more restrictive than those imposed in the March 12, 2020 Declaration of Emergency for COVID-19.

On June 1, 2020, the Clark County Courthouse in Las Vegas reopened customer service windows to the public. Social distancing and other safety measures are still in effect. Eviction actions remain temporarily suspended.

Pursuant to the Amended

Administrative Order 2020-3, the first-floor customer-service windows for the Justice Court in Reno, Nevada, remain closed to the public. Individuals may only file documents for civil actions on the Court's electronic-filing system or by emailing an electronic copy of the document. The second-floor lobby and courtrooms are closed to the general public. Additionally, the Reno Justice Court will continue to restrict eviction cases to emergency eviction matters as set forth in Administrative Order 2020-4. All other eviction cases are temporarily suspended.

The Second Judicial District Court in Washoe County remains closed to physical access and will continue virtual proceedings.