

FILED

BEFORE THE REAL ESTATE COMMISSION

NOV 23 2016

STATE OF NEVADA

SHARATH CHANDRA, Administrator,  
REAL ESTATE DIVISION,  
DEPARTMENT OF BUSINESS &  
INDUSTRY, STATE OF NEVADA,

Case no. 2015-620

REAL ESTATE COMMISSION  
BY *[Signature]*

Petitioner,

v.

JULIANN SOKACH,

Respondent.

**RESPONSE TO COMPLAINT**

Comes now, Respondent, Juliann Sokach, by and through Steven Mack, Esq., of Black & LoBello, her attorneys of record, hereby responds to the Complaint on file herein as follows:

1. Respondent admits the allegations contained in Paragraphs 1, 2 and 10.
2. Answering Paragraph 3, it is believed that the owners of Centennial Real Estate are Sandra Salisbury, Vince Hackett and Lee Paniero, and as a result, and to the extent that this differs from the facts alleged, Respondent Denies this Paragraph.
2. Respondent denies the allegations contained in Paragraphs 5, 6, 7, 8, 11, 14, and 15.
3. Answering Paragraphs 4, 9, 12, 13, 16, 17, and 18, the statements are ambiguous or Respondent is without sufficient information and/or knowledge to form a belief as to the truthfulness of said allegations and on that basis denies the same.

FIRST AFFIRMATIVE DEFENSE

Petitioner's Complaint fails to state a claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

Any damages which Petitioner may have sustained by reason of the allegations of its Complaint were proximately caused by the acts of persons other than this answering Respondent and, therefore, Petitioner is not entitled to any relief from this answering Respondent.

**BLACK & LOBELLO**  
10777 W. Twain Avenue, 3rd Floor  
Las Vegas, Nevada 89135  
(702) 869-8801 FAX: (702) 869-2669

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THIRD AFFIRMATIVE DEFENSE

The actions of this answering Respondent complained of by the Petitioner in no way caused or contributed to any damages.

FOURTH AFFIRMATIVE DEFENSE

Petitioner has suffered no damages.

FIFTH AFFIRMATIVE DEFENSE

Petitioner's claims are not well grounded in fact and are not warranted by existing law or good faith argument for the extension or modification of existing law but pursued only for the purpose of harassment, unnecessary delay and the incurrence of needless cost of litigation to the Respondent.

SIXTH AFFIRMATIVE DEFENSE

Petitioner's Complaint is barred by laches.

SEVENTH AFFIRMATIVE DEFENSE

Pursuant to NRCPC 11, as amended, all possible Affirmative Defenses may not have been alleged herein insofar as sufficient facts were not available after reasonable inquiry upon the filing of these answering Respondent's Answer, and, therefore, this answering Respondent reserves the right to amend this Answer to allege additional Affirmative Defenses if subsequent investigation and discovery warrant.

EIGHTH AFFIRMATIVE DEFENSE

Respondent has been required to retain the services of Black & LoBello to defend this action and reasonable attorney's fees and costs of suit herein incurred should be awarded therefore.

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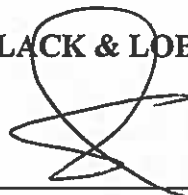
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WHEREFORE, Respondent prays as follows:

1. That Petitioner take nothing by way of its Complaint on file herein;
2. For reasonable attorney's fees and the costs of litigation incurred herein; and
3. Such other ~~and~~ further relief as the Commission may deem just and proper.

DATED this 10 day of November, 2016.

**BLACK & LOBELLO**



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Steven Mack, Esq.  
Nevada Bar No. 4000  
10777 W. Twain Avenue, Third Floor  
Las Vegas, NV 89135  
Attorney for Respondent

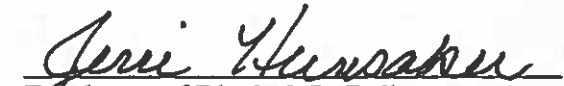
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**CERTIFICATE OF SERVICE**

I certify that on the 18<sup>th</sup> day of November, 2016, I deposited a copy of the foregoing  
**Response to Complaint** in the United States mail, postage pre-paid, in Las Vegas, Nevada,  
address to the following at their last known address as follows:

Real Estate Division State of Nevada Attn: Legal Administrative Officer 2501 East Sahara Avenue Las Vegas, NV 89104-4137	Keith E. Kizer Senior Deputy Attorney General 555 E. Washington Avenue, Suite 3900 Las Vegas, NV 89101
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Employee of Black & LoBello