

911 LAW GROUP
911 N. Buffalo Dr., Suite 201
Las Vegas, Nevada 89128
TEL: (702) 333-3334 FAX: (702) 385-2899

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

MITCHELL S. BISSON, ESQ.
Nevada Bar No. 011920
911 LAW GROUP
911 N. Buffalo Dr., Ste. 201
Las Vegas, NV 89128
Telephone No.: (702) 333-3334
Facsimile No.: (702) 385-2899
Email: mbisson@911legalgroup.com
*Attorney for Respondent
Hillary Brown*

FILED

NOV 17 2020

REAL ESTATE COMMISSION
BY *[Signature]*

**BEFORE THE REAL ESTATE COMMISSION
STATE OF NEVADA**

Case No.: 2018-1087

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

**RESPONDENT'S ANSWER TO
PETITIONER'S COMPLAINT**

Petitioner,
vs.
HILLARY BROWN,
Respondent.

Respondent Hillary Brown, by and through her counsel of record, Mitchell S. Bisson, Esq. of the 911 Law Group, hereby files her Answer to Petitioner's Complaint, as follows:

ANSWER

1. As to Paragraphs 1 and 2 of Petitioner's Complaint, Respondent admits to the allegations contained therein.
2. As to Paragraphs 3, 4, 5, 7, 8, and 9 of Petitioner's Complaint, Respondent is asked to make a legal conclusion and thus lacks sufficient information as for the allegations contained therein, and therefore deny the same.
3. As to Paragraphs 6 and 10 of Petitioner's Complaint, Respondent lacks sufficient information as for the allegations contained therein and therefore denies the same.

1 4. As to the non-numbered assertions set forth on page 1 of the Complaint,
2 specifically under the Paragraphs entitled "Complaint and Notice of Hearing" and "Jurisdiction,"
3 Defendant is asked to make a legal conclusion and thus lack sufficient information as for the
4 allegations contained therein, and therefore deny the same.

5 5. Any other allegations not specifically responded to were inadvertently omitted
6 and are further denied.

7
8 **AFFIRMATIVE DEFENSES**

9 **FIRST AFFIRMATIVE DEFENSE –**

10 Respondent has not received any commissions or profits from the alleged transaction.

11 **SECOND AFFIRMATIVE DEFENSE –**

12 Petitioner has failed to state a claim for which relief or penalty may be granted.

13 **THIRD AFFIRMATIVE DEFENSE –**

14 Petitioner has suffered no legal damages.

15 **FOURTH AFFIRMATIVE DEFENSE –**

16 Plaintiff is not entitled to equitable relief.

17 **FIFTH AFFIRMATIVE DEFENSE –**

18 The damages and violations alleged were due to the acts and omissions of other parties.

19 **SIXTH AFFIRMATIVE DEFENSE –**

20 To the extent that a contract existed, the other parties, apart from Respondent, have not
21 fully performed under the contract.

22 **SEVENTH AFFIRMATIVE DEFENSE –**

23 Petitioners claims are made without adequate substance, to such an extent that
24 Respondent is entitled to an award of attorney fees and costs for defending this action.
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EIGHTH AFFIRMATIVE DEFENSE –

Petitioner has failed to mitigate their damages, if any.

NINTH AFFIRMATIVE DEFENSE –

Petitioner’s Complaint is barred by the doctrine of laches.

TENTH AFFIRMATIVE DEFENSE –

Petitioner’s Complaint is barred by the applicable statute of limitations.

ELEVENTH AFFIRMATIVE DEFENSE –

Petitioner’s Complaint failed to allege conduct by or attributable to Respondent that actually or proximately caused any of the injuries or violations alleged in the Complaint.

TWELFTH AFFIRMATIVE DEFENSE –

Respondent has been required to retain the services of 911 Law Group to defend against Petitioner’s Complaint and is therefore entitled to reasonable attorney’s fees and costs herein.

THIRTEENTH AFFIRMATIVE DEFENSE –

To the extent applicable, Respondent incorporates by reference any and all affirmative defenses enumerated in Rule 8 of the Nevada Rules of Civil Procedure as if fully set forth herein for the purpose of not waiving them. In the event additional affirmative defenses become applicable, Respondent reserves the right to seek leave of Court to amend her Answer to assert them.

PRAYER FOR RELIEF

Wherefore, Respondent prays for the following relief:

1. That it be held that Respondent has committed no violations.
2. That no penalties be imposed upon Respondent.
3. That no damages be imposed upon Respondent.
4. That Petitioner take nothing by reason of its Complaint.

911 LAW GROUP
911 N. Buffalo Dr., Suite 201
Las Vegas, Nevada 89128
TEL: (702) 333-3334 FAX: (702) 385-2899

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- 5. That the Complaint be dismissed.
- 6. That judgment be entered in favor of Respondent and against Petitioner.
- 7. For reasonable attorney fees and costs.
- 8. For any further relief this Court deems just and proper.

Dated this 17th day of November, 2020.

911 LAW GROUP

/s/ MITCHELL S. BISSON, ESQ.
MITCHELL S. BISSON, ESQ
Nevada Bar No. 11920
911 N. Buffalo Dr., Ste. 201
Las Vegas, NV 89128
*Attorney for Respondent
Hillary Brown*