

JAN 19 2024

REAL ESTATE COMMISSION
BY Kelly Valadez

BEFORE THE REAL ESTATE COMMISSION

STATE OF NEVADA

SHARATH CHANDRA, Administrator,)
REAL ESTATE DIVISION,)
DEPARTMENT OF BUSINESS &) CASE NO.: 2023-460
INDUSTRY, STATE OF NEVADA)

Petitioner,) **RESPONDENT DINORA SHARPE'S**
vs.) **ANSWER TO COMPLAINT**

DINORA SHARPE,)
Respondent.)

COMES NOW, Respondent DINORA SHARPE, by and through her attorneys of record, JOHN V. SPILOTRO, ESQ., of THE LAW OFFICE OF JOHN V. SPILOTRO, ESQ., P.C. and LISA M. SZYC, ESQ. of BACKUS | BURDEN and answers Petitioner's Complaint on file herein by admitting, denying, and answering the allegations contained in said Complaint as set forth hereinafter.

ANSWER TO COMPLAINT

JURISDICTION

In this answering paragraph of Petitioner's Complaint, Answering Respondent denies the allegations contained therein.

GENERAL ALLEGATIONS

1. In answering paragraph 1 of Petitioner's Complaint, Answering Respondent is without knowledge or information sufficient to enable her to admit or deny the allegations and on that basis deny the allegations contained therein.

2. In answering paragraphs 2, 3, 4, 6, 7, 8, 9, 10, 11, 13, 19, 22, and 26 of Petitioner's Complaint, Answering Respondent admits the allegations contained therein.

1 harassment, unnecessary delay and the incurrence of needless cost of litigation to the Answering
2 Respondent.

3 **FIFTH AFFIRMATIVE DEFENSE**

4 The Answering Respondent has been required to retain the services of an attorney in order to
5 defend this action and is therefore, entitled to reasonable attorney's fees plus costs of suit incurred
6 herein.

7 **SIXTH AFFIRMATIVE DEFENSE**

8 Petitioner's claims are barred, in whole or in part, because at all times mentioned in the
9 Complaint, Answering Respondent acted in a manner authorized and/or required by law or contract.
10

11 **SEVENTH AFFIRMATIVE DEFENSE**

12 The damages allegedly sustained by Petitioner was the result of Petitioner's own acts and/or
13 omissions and/or those of others over whom Answering Respondent has no control and said alleged
14 damages are not the result of any acts and/or omissions of Answering Respondent.
15

16 **EIGHTH AFFIRMATIVE DEFENSE**

17 Answering Respondent is informed and believe, and thereon alleges, that the Petitioner has
18 failed to join all necessary and indispensable parties to this lawsuit.
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20 **NINTH AFFIRMATIVE DEFENSE**

21 The Complaint, and each and every cause of action contained therein, is barred by the
22 applicable Statue of Repose.
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24 **TENTH AFFIRMATIVE DEFENSE**

25 This Court is without Jurisdiction.

26 **ELEVENTH AFFIRMATIVE DEFENSE**

27 The action must be dismissed under the doctrine of forum non conveniens.
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TWELVTH AFFIRMATIVE DEFENSE

The Complaint, and each and every cause of action contained therein, is barred by the applicable Statue of Limitations and/or laches.

THIRTEENTH AFFIRMATIVE DEFENSE

Plaintiff lacks standing.

FOURTEENTH AFFIRMATIVE DEFENSE

Answering Respondent is informed and believe, and upon such information and belief, allege that the Petitioner has engaged in conduct and activities sufficient to constitute a waiver by reason of which they are estopped to assert any claim or cause of action against Answering Respondent.

FIFTEENTH AFFIRMATIVE DEFENSE

This instant action must be dismissed under the doctrine of estoppel.

SIXTEENTH AFFIRMATIVE DEFENSE

The Injuries complained of in the Petitioner’s Complaint, if any, were not the result of willful, malicious, oppressive, or deliberate conduct on the part of the Answering Respondent.

SEVENTEENTH AFFIRMATIVE DEFENSE

Pursuant to NRCPC 8, 9 and 11, all possible affirmative defenses may have been alleged herein insofar as sufficient facts were not available after reasonable inquiry upon filing the Answer, therefore, Answering Respondent reserves the right to amend this answer to allege additional Affirmative Defenses as subsequent investigation warrants.

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WHEREFORE, Answering Respondent prays that Petitioner takes nothing by reason of their Complaint on file herein and that the same be dismissed.

DATED this 19th day of January, 2024.

THE LAW OFFICE OF
JOHN V. SPILOTRO, ESQ. P.C.

BACKUS | BURDEN

/s/: John V. Spilotro
JOHN V. SPILOTRO, ESQ.
Nevada Bar No. 4134
319 S. Third Street, Suite 100
Las Vegas, Nevada 89101
Attorney for Defendant

/s/: Lisa M. Szyk
LISA M. SZYC, ESQ.
Nevada Bar No. 11726
3050 S. Durango Drive
Las Vegas, Nevada 89117
Attorney for Defendant

1 **CERTIFICATE OF SERVICE**

2 Pursuant to N.R.C.P 5(b), I hereby certify that I am an employee of THE LAW
3 OFFICE OF JOHN V. SPILOTRO, ESQ. PC. and that on the 19th day of January, 2024, I served via

4 Electronically served via the Courts *E-filing System*

5 Mailed a true and correct copy, postage prepaid in Las Vegas, Clark County

6 Sent via Facsimile

7 Sent via Electronic Mail

8 a true and correct copy of the foregoing **RESPONDENT DINORA SHARPE'S ANSWER TO**
9 **COMPLAINT** in the above matter addresses as follows:

10 REAL ESTATE DIVISION
11 STATE OF NEVADA
12 3300 W. Sahara Avenue, Suite 350
13 Las Vegas, Nevada 89102
14 Attn: Legal Administrative Officer

15 Christal P. Keegan, Esq.
16 Deputy Attorney General
17 5420 Kietzke Lane, #202
18 Reno, Nevada 89511
19 ckeegan@ag.nv.gov

20 */s/ Adalena Clayton*
21 Employee of The Law Office of
22 John V. Spilotro, Esq.
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