**Electronically Filed** 03/09/2017 02:52:20 PM

1 DAMON A. SCHUETZE, ESQ. 2 Nevada Bar #4047 EVA L. D. JOHNSON, ESQ. Nevada Bar #10628 SCHUETZE & McGAHA, P.C. 601 South Rancho Drive, Suite C-20 Las Vegas, Nevada 89106 (702) 369-3225 Attorneys for Plaintiff/Counterdefendant

CLERK OF THE COURT

## DISTRICT COURT

#### CLARK COUNTY, NEVADA

ARTHUR TERABELIAN,

CASE NO.: D-11-449918-D DEPT. NO.: B

Plaintiff,

VS.

JULIE KLATT,

Date of Hearing: 03/15/17 Time of Hearing: 9:30 a.m.

Defendant.

### NOTICE OF INTENT TO APPEAR BY COMMUNICATION EQUIPMENT

COMES NOW Defendant, JULIE KLATT, pursuant to Order Adopting Part IX of the Supreme Court Rules filed December 18, 2008, and here by submits notice of intent to appear by communication equipment for the March 15, 2017 at 9:30 a.m., hearing. Defendant can be reached at 1-402-756-8020. Defendant understands that it is her responsibly to ensure that she can be reached at this telephone number and that the hearing my be called at a time other than the scheduled time due to the unpredictability of hearings.

DATED this 9th day of March, 2017.

SCHUETZE & McGAHA, P.C.

By /s/ Eva L. D. Johnson DAMON A. SCHUETZE, ESQ. Nevada Bar #4047 EVA L. D. JOHNSON, ESQ. Nevada Bar # 10628 601 S. Rancho Drive, Suite C-20 Las Vegas, Nevada 89106 Attorney for Defendant

Page 1 of 2

CERTIFICATE OF SERVICE Pursuant to NRCP 5(b), I certify that I am an employee of SCHUETZE & McGAHA, P.C. and that on this 9th day of March, 2017, I caused the foregoing NOTICE OF INTENT TO APPEAR BY COMMUNICATION EQUIPMENT listed on the service list: Matthew H. Friedman, Esq. Stephen S. Oliver, Esq. FORD & FRIEDMAN 2200 Paseo Verde Parkway, Suite 350 Henderson, Nevada 89052 /s/ Nancy L. Arrington
An employee of SCHUETZE & McGAHA 

### 

#### POINTS AND AUTHORITIES

#### I. FACTS/HISTORY

Plaintiff hired MATTHEW FRIEDMAN, ESQ., on January 30, 2017, to represent him in a hearing on February 14, 2017. However, Mr. Friedman chose to continue the matter until March 10, 2017. The matter was again continued by him to April 4, 2017. He then decided to go on vacation - and had the case continued once again. He failed to provide a 5.501 letter to the opposing side. To this day, the matter has not been before the court - yet Mr. Friedman billed in excess of \$13,000 in fees in this matter, and unilaterally filed a motion to withdraw three days before the hearing, without informing Plaintiff, who was forced to learn of this on his own through the court website.

Mr. Friedman was ineffective counsel. He did not progress the case AT ALL. The only thing he did was spin and continue the case, churning attorney fees as he went.

On May 2, 2017, Plaintiff was forced to file a police report due to the verbal assault, harassment, intimidation and threats made by Mr. Friedman. See Exhibit "1".

Plaintiff was also forced to file a bar complaint due to the above as well as INEFFECTIVE COUNSEL. See Exhibit "2".

Plaintiff is concerned that Mr. Friedman has done nothing by defame other attorneys in this matter, yet failed to perform his job. He has violated the Professional Code of Conduct, and should be held accountable to protect the public from his antics.

Plaintiff requests the court order the immediate removal of Mr. Friedman from this case.

Plaintiff requests this court acknowledge the matter is being addressed before the Nevada State Bar.

Dated this A day of MAY, 2017

ARTUR TERABELIAN Plaintiff in Proper Person

#### 1 AFFIDAVIT OF PLAINTIFF State of Nevada ) 2 ) ss County of Clark ) 3 4 I, ARTUR TERABELIAN, being first duly sworn, depose and say: 5 1. I am the Plaintiff in the above entitled matter, and I make this affidavit attesting to the facts. I am replacing my former attorney, who I have been forced to file a complaint against at 6 the Nevada State Bar. 7 2. Mr. Friedman has not been effective counsel. He has repeatedly continued the court 8 hearing for the sole purpose of running up an exorbinate bill. He makes a habit of badmouthing other attorneys, and he has threatened and harassed me so bad that I have been forced to file a 9 POLICE REPORT. 10 3. I request the court immediately remove him from representation, and that the court 11 acknowledge the ethical issues in this matter. His actions are harming my case, and my child. 12 FURTHER YOUR AFFIANT SAYETH AUGHT 13 14 RTUR TERABEI Sworn and subscribed to before me 15 EMILY STEVENS this day of . 2017. NOTARY PUBLIC 16 17 **NOTARY PUBLIC** 18 19 20 21 22

23

24

25

26

27

28



Case Report No.: LLV170509002365

#### Administrative

Location

5071 N RAINBOW BLVD LAS VEGAS, NV 89130 Occurred On (Date / Time)

Tuesday 5/2/2017 7:42:00 PM

Reporting Officer Entered By

14051 - Mourning, Sara L 14051 - Mourning, Sara L

Related Cases

Or Between (Date / Time) Reported On 5/9/2017

Entered On

5/9/2017 2:22:46 PM

Jurisdiction

Las Vegas, City of

Sector /Beat

X4

Traffic Report

No

Place Type

Accident Involved

Offenses:

Harassment, (1st)(M)-NRS 200.571.2A Completed Yes

Criminal Activities

Domestic Violence Premises Entered

No

Hate/Bias

Type Security

Tools

Location Type Commercial/Office Building

Victims:

Entry

Weapons

Name: TERABELIAN, ARTUR

Victim Type Victim of

Individual

Written Statement 50328 - Harassment, (1st)(M)-NRS 200.571.2A

Yes

Can ID Suspect

Yes

DOB Height

Injury

6/8/1971

5' 8"

Weight

Sex

5071 N Rainbow Blvd #110 LAS VEGAS, NV 89130

Male

Race White Hair Color **Brown**  Ethnicity

Not Hispanic or Latino

Eye Color Brown

Employer/School Occupation/Grade

OWNER

GENESIS REALTY GROUP

Work Schedule Injury Weapons

Addresses Business

Phones

Business/Work Business/Work

(702) 806-9595 (702) 251-9595

\*\*THIS REPORT IS SUBJECT TO CHANGE UPON SUPERVISORY APPROVAL\*\*

Offender Relationships Notes:

Suspects:

Name: FRIEDMAN, MATT

Alias:

Scope ID

DOB

Age 38 Race

White

Ethnicity

Brown

Not Hispanic or

Sex Male Employer/School

Height

5' 9"

Weight

180

Hair Color

Brown

Occupation/Grade

Eye Color ATTORNEY

Latino

Addresses

Residence

16 Summit Walk Trl HENDERSON, NV 89052

Phones Cellular

(702) 476-2400

Notes:

Arrestees:

LINEAWFUL DISSEMENATION of this Witnesses:

Restricted information is PROHIBITED. Violation will subject the offender to

must and By Liability.

Other Entities:

Properties: ()

Date:

as Vegas Metropolitan Police Department

Narrative

Victim Artur Terabelian came into NWAC on 05/09/2017 and stated the following:

Artur states on 05/02/2017 at approximately 1942 hours he was contacted by Matt Friedman. Artur states that Matt was asking him how things were going and he advised him that he was just waiting for his custody hearing. Artur states Matt then advised him of a \$4000.00 balance still owed. 5/9/2017 2:40 PM

LLV170509002365

Artur states he advised Matt that he has already paid him \$10,000.00 and they had not yet stepped into a court room.

Artur states Matt immediately began cussing at him and stated, "you mother fucker you will pay me".

Artur states he was shocked and went back at Matt verbally stating, "you do not have the right to cuss at me and don't ever mistake my kindness

Artur states the conversation went back and forth for a bit until he just decided to hang up and end it. Artur states he will be contacting the board to report Matt Friedman.

Artur was advised to file a police report and provided a victim information guide.

. ,	$\sim$
Page_	of of

## LAS VEGAS METROPOLITAN POLICE DEPARTMENT

VOLUNTARY STATEMENT

170509-2365

THIS PORTION TO BE COMPLETED BY OFFICER		
Specific Crime	Date Occurred	Time Occurred
Location of Occurrence 5071 N. Agan Man LVN 89130	5/2/17 Sector/Beat	- Leity
THE MENT LYN 1100	1 14	☐ County
Your Name (Last / First / Middle)		
TERABELIAN ARTUR	Date of Birth	Social Security #
WY 17 M 5'8" 190 BRW 88W Work Scholl. (Hours) (Days Off	Business / Scho	ol
Residence Address: (Number & Street)  Bldg./Apt.# City  State Zip Code	Res. Phone:	02 806 4595
Bus. (Local) Address: (Number & Street)  Bldg./Apt.# City  State Zip Code	Bus. Phone:	Depart Date (if visitor)
Best place to contact you during the day  Best time to contact you during the	lav	
		Can You Identify ☐ Yes the Suspect? ☐ No
DETAILS ON MAY 2ND APROX. 742 Pm MA	thew F	willman
called me while I was still At the office	Warking	x he short
ASKING HOW I WAS & JAID I'M DUST WAITH	y to go	
and the Diagram	Bornu	00111
Autof \$ 3000 00 Till a	0 - 1	6
	Dy My pa	a A pome
100 1-0 Dicht 8810	g NW	\$000 AUN
	Mr. Charis	by By me
4 Total Joseph Marie Joseph	me " I	tolo him
Don't you over work of me And I solo	Why And	2 you
Other Estangly I floor you \$ 10000- 81 you	1 hAVE A	volue foc
steppes in the count Room All you have Da	se is self	on of Oxtrailer
I so At You 3 welks Ago send \$ 5-1) Form	n Reque	st to my
EX'S Attorney to request to TATE to my SA		
I have not has since co I is	And are served	1 sin
and at her four extension	ARR NO.	t downly
1. 1/2	Y-00) 9/1	ov weven
The own		on coll
HAVE READ THIS STATEMENT AND AFFIRM TO THE TRUTH AND ACCURACY OF THE FACTS CONTAIN	ED HEREIN. THIS	STATEMENT WAS
N THE DAY OF MAY AT 190 (AM / PM), 2017		
/itness/Officer: (SIGNATORE)	A	
/itness/Officer:		
SIGNATUR	OF PERSON GIVING S	TATEMENT

LAS VEGAS METROPOLITAN POLICE DEPARTMENT VOLUNTARY STATEMENT CONTINUATION Page 2 of d me is when your osking PARCE stood up for my slit MAH voice to lo me to calm Dowd. I Tolo win KOND Mys for my wearness. Ton) mother frechen to topk to your man, DAD work kins, then 60 hlm.

:SS:

SIGNATURE OF PERSON GIVING STATEMENT



RECEIVED BY
MAY 0 9 2017
STATE BAR OF NEVADA

# RECEIPT OF DOCUMENT

	ţ	On this_	From:		The Stat
		day of	カ	2.3	The State Bar of Nevada is in Receipt of:
		of O	Terabolian	WHILL	ıda is in Rece
State Bar		٤,	/	2)	ipt of:
State Bar of Nevada Employee	X	20 17.		indman, E	(resple
Employee	Ų		C	E59.	5

EXB 2





# RECEIPT OF DOCUMENT

		On this	From:	10	The Sta
		On this 10, day of MON	A T	re Complaint against matthew Friednam, ESQ.	The State Bar of Nevada is in Receipt of: Aditional decuments
		lay of Mc	erabeli	aint	evada is in
Si		Z	8	Evins-	Receipt of:
State Bar of Nevada Employee	Man	, 20		H-DIA+	Addi
Nevada Eı				new Fri	ticazel
nployee				"Tuzzup	docum
	,			ESQ.	rint