

1 Patrick S. Davis
2 Redacted
3 Sparks, NV 89431
4 (775) Redacted
5 Plaintiff in Proper Person

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NITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PATRICK STEPHEN DAVIS)
Plaintiff,) Case No. 3:13-CV-00559-MMD-WGC
vs.)
STATE OF NEVADA ET AL;) **MOTION FOR NOTICE OF**
Defendants) **DEFICIENCY**

COMES NOW, the Plaintiff, in proper person and on his own behalf, and respectfully requests the Court to grant his Motion for Notice of Deficiency regarding his original Complaint filed to this Court on October 4, 2013, in the above entitled action. Plaintiff seeks redress for his claims for relief against Defendants, and each of them, individually and in their official capacities, jointly and severally, based upon knowledge, information, and reasonable belief derived therefrom. This Motion for Notice of Deficiency is based on Fed. R. Civ. P. 8; Fed. R. Civ. P. 15; the attached Memorandum of Points and Authorities and all other papers and pleadings filed therein.

JURISDICTION AND VENUE

This Court has subject matter jurisdiction over the federal Constitutional violations that have been and will further be alleged in an amended Complaint to be filed by all Plaintiffs if this Motion for Notice of Deficiency and the concurrent Motion for Permissive Joinder and Motion to Amend is granted. Jurisdiction is granted to this Court pursuant to 28 U.S.C. § 1331 and 1343. All of the Plaintiff's causes of action arise under 42 U.S.C. § 1981; 42 U.S.C. § 1983; 42 U.S.C. § 1985; 42 U.S.C. § 1986; 42 U.S.C. § 1988; and are due to the deprivation by Defendants of all Plaintiff's rights, privileges and immunities secured to them under the First; Fourth; Fifth; Sixth and Fourteenth Amendments to the United States Constitution.

This Court has supplemental jurisdiction over all Plaintiff's causes of action arising under Nevada state law pursuant to 28 U.S.C. § 1367. This court has jurisdiction to issue injunctive

1 and declaratory relief pursuant to 28 U.S.C. § 2201; 42 U.S.C. § 1983; NRS 233B.110 and NRS
2 30.030 to NRS 30.060 inclusive.

3 Venue lies in the Northern Division of the United States District Court for the District of
4 Nevada pursuant to 28 U.S.C. § 1391(a)(1) and 28 U.S.C. § 1391(b)(2). The causes of action
5 alleged herein arise from factual allegations occurring in this judicial district. One or more of the
6 Defendants is a political subdivision of the State of Nevada, and the underlying acts, omissions,
7 events, injuries and related facts upon which the present action is based occurred in Washoe
8 County, Nevada, and Carson City, Nevada.

9 On information and belief, it is alleged that all causes of action were committed in this
10 judicial district; it is alleged that each of the named Defendants reside and work in this judicial
11 district; and individually, each of the Plaintiff's seeking joinder resides in this judicial district, or
12 in the State of Nevada.

13 **NATURE OF THE ACTION**

14 Plaintiff has brought this action against Defendants based on various statutes, directives,
15 Policy and Procedure, custom and usage, and occurrences as imposed and applied to him and
16 others in regards to his status as and their status or non-status as an offender serving the **civil**
17 sentence of Lifetime Supervision. The instant action is for monetary damages; declaratory and
18 injunctive relief brought pursuant to 42 U.S.C. § 1981, 1983, 1985, 1986 and 1988; violations of
19 the First, Fourth, Fifth, Sixth, and Fourteenth Amendments to the United States Constitution;
20 violations of the Constitution of the State of Nevada; and violations of the laws of the State of
21 Nevada, against the named Defendants. These Defendants include the Chairman of the Board of
22 Parole Commissioners; the Director and Officers of the Nevada Department of Public Safety; the
23 Chief and Officers of the Nevada Division of Parole and Probation; in their individual and
24 official capacities, and is also a complaint against the State of Nevada; the Nevada Attorney
25 General; the Nevada Department of Public Safety; and the Nevada Division of Parole and
26 Probation.

27 **MEMORANDUM OF POINTS AND AUTHORITIES**

28 **I. INTRODUCTION**

Plaintiff respectfully requests the Court to notice the Plaintiff on the deficiencies of the
original complaint as required before the Court opines on the Motion to Dismiss filed by
Defendants. In order to protect Plaintiffs constitutional rights, privileges and immunities granted

1 to him by the United States and Nevada Constitutions; and in the interests of judicial economy,
2 Plaintiff seeks notice of deficiency in this motion in the instant case and the concurrent Motion
3 for Permissive Joinder and Motion to Amend against Defendants.

4 **II. BACKGROUND**

5 Defendants have moved to dismiss the original complaint filed by Plaintiff on various
6 grounds including statute of limitations issues, sovereign and qualified immunity; failure to state
7 a justiciable claim, and for failure to properly join a party to the action. The Motion to Dismiss
8 and Opposition is pending before this Court.

9 **III. ARGUMENT**

10 An amended Complaint, if granted to Plaintiff by this Court, will allow all Plaintiff's to
11 state with greater clarity which offenses specifically relates to the actions of individual officers,
12 clearly identify the causes of action including claims for relief, add additional parties to the
13 action pursuant to federal rule, including additional Defendants, and the various state agencies
14 which condone and approve of those actions. In will satisfy any issue of a failure to state a
15 justiciable claim or failure to properly join a party to the action and will allow a determination on
16 the merits of the instant action. Statutes of limitations and sovereign or qualified immunity are
17 affirmative defenses, and as such should not be the underlying reason to grant a Motion to
18 Dismiss. They are in effect better suited to a Motion for Summary Judgment, which Defendants
19 seem to be asserting at this time. The Court has a duty to notify the pro se Plaintiff of any
20 deficiencies to help mitigate the chances that a complaint will not be heard on its merits before
21 summary dismissal due to "technicalities".

22 **1. Pro Se Standing.**

23 The United States Supreme Court has championed the cause of litigants who file their
24 own lawsuits. It is well settled law that the allegations of such a [pro se] complaint, "however
25 inartfully pleaded" are held "to less stringent standards than formal pleadings drafted by lawyers,
26 Haines v. Kerner, 404 U.S. 519,520 (1972). See also Maclin v. Paulson, 627 F.2d 83, 86 (CA7
27 1980); French v. Heyne, 547 F.2d 994,996 (CA7 1976).

28 Such a complaint should not be dismissed for failure to state a claim unless it appears
beyond doubt that the plaintiff can prove no set of facts in support of his claim which would
entitle him to relief. *Haines*, supra, at 520, 521. quoting Conley v. Gibson, 355 U.S. 41, 45, 46,

1 (1957). And, of course, the allegations of a complaint are generally taken as true for purposes of
2 a motion to dismiss. Cruz v. Beto, 405 U.S. 319,322 (1972).

3 **2. Pro Se Pleadings should be construed liberally and to allow Substantial Justice.**

4 Rule 8(f) provides that 'pleadings shall be so construed as to do substantial justice.' We
5 frequently have stated that *pro se* pleadings are to be given a liberal construction. Baldwin
6 County Welcome Center v. Brown, 466 U.S. 147,104 S. Ct. 1723, (1984). In Rabin v. Dep't of
7 State, 980 F. Supp. 116, No. 95-4310, (U.S. Dist. Ct. E.D. NY, 1997), the court noted that *pro*
8 *se* plaintiffs should be afforded "special solicitude."

9 In the 9th Circuit, it has been allowed to a pro se plaintiff who was pleading only under §
10 1983 to proceed under § 1985, noting our "obligation where the petitioner is pro se, particularly
11 in civil rights cases, to construe the pleadings liberally and to afford the petitioner the benefit of
12 any doubt." Bretz v. Kelman, 773 F.2d 1026, at 1027 n. 1, (1985); see also Christensen v.
13 C.I.R., 786 F.2d 1382, 1384-85 (9th Cir.1986).

14 **3. Pro Se Plaintiff is entitled to Notice of the Complaint's Deficiencies.**

15 Plaintiff argues that the Courts give special consideration to pro se litigants requesting
16 leave to amend a complaint. "Courts are particularly reluctant to deny leave to amend to pro se
17 litigants." Flowers v. First Hawaiian Bank, 295 F.3d 966, 976 (9th Cir. 2002). In particular,
18 "[u]nless it is absolutely clear that no amendment can cure the defect ... a pro se litigant is
19 entitled to notice of the complaint's deficiencies and an opportunity to amend prior to dismissal
20 of the action." Lucas v. Dept. of Corrections, 66 F.3d 245, 248 (9th Cir. 1995).

21 Plaintiff argues that if there is any chance that an amendment can cure the defect; a pro se
22 litigant is entitled to notice of the complaint's deficiencies and an opportunity to amend prior to
23 dismissal of the action. Noll v. Carlson, 809 F.2d 1446, 1448 (9th Cir.1987); Franklin v.
24 Murphy, 745 F.2d 1221, 1230 (9th Cir.1984); see also Jackson v. Arizona, 885 F.2d 639, 640
25 (9th Cir.1989) (noting that "an indigent plaintiff with an arguable claim is entitled to issuance
26 and service of process").

27 While Fed.R.Civ.P. 15 places leave to amend within the sound discretion of the trial
28 court, the 9th Circuit has stressed that a court must remain guided by "the underlying purpose of
Rule 15 ... to facilitate decision on the merits, rather than on the pleadings or
technicalities." United States v. Webb, 655 F.2d 977, 979 (9th Cir.1981); see also Conley v.
Gibson, 355 U.S. 41, 48, 78 S. Ct. 99, 103, 2 L.Ed.2d 80 (1957). A pro se litigant must be given

1 leave to amend his or her complaint unless it is "absolutely clear that the deficiencies of the
2 complaint could not be cured by amendment." Broughton v. Cutter Laboratories, 622 F.2d 458,
3 460 (9th Cir.1980) (Per Curiam).

4 Plaintiff argues that the rule favoring liberality in amendments to pleadings is particularly
5 important for the pro se litigant. Presumably unskilled in the law, the pro se litigant is far more
6 prone to making errors in pleading than the person who benefits from the representation of
7 counsel. Indeed, the Supreme Court has held that allegations of a pro se complaint are held to
8 less stringent standards than formal pleadings drafted by lawyers. Haines v. Kerner, 404 U.S.
9 519, 520-21, 92 S. Ct. 594, 595-96, 30 L.Ed.2d 652 (1972) (Per Curiam); see also Maurer v.
10 Individually and as Members of Los Angeles County Sheriff's Dept., 691 F.2d 434, 437 (9th
11 Cir.1982) and Gillespie v. Civiletti, 629 F.2d 637, 649 (9th Cir.1980).

12 Plaintiff contends that the requirement that courts provide a pro se litigant with notice of
13 the deficiencies in his or her complaint helps ensure that the pro se litigant can use the
14 opportunity to amend effectively. Without the benefit of a statement of deficiencies, the pro se
15 litigant will likely repeat previous errors. This is equally true for the pro se litigant who amends
16 his complaint at his own instance without any guidance from the court. Amendments that are
17 made without an understanding of underlying deficiencies are rarely sufficient to cure inadequate
18 pleadings.

19 If, in reviewing whether a complaint states an arguable claim, the court considers matters
20 outside the pleadings, the dismissal is in fact a summary judgment pursuant to Fed.R.Civ.P.
21 56. See, e.g., Fed. R. Civ. P. 12(b)(6); Tanner v. Heise, 879 F.2d 572, 576 (9th
22 Cir.1989) (construing defendant's motion to dismiss as a motion for summary judgment because
23 district court considered plaintiff's affidavit). When the district court transforms a dismissal into
24 a summary judgment proceeding, it must inform a plaintiff who is proceeding pro se that it is
25 considering more than the pleadings, and must afford a reasonable opportunity to present all
26 pertinent material. Garaux v. Pulley, 739 F.2d 437, 438-39 (9th Cir.1984)(adopting rule of strict
27 adherence to formal notice requirements where court converts motion to dismiss into one for
28 summary judgment, and nonmoving party is appearing pro se); Fed.R.Civ.P. 12(b)(6). The notice
requirement is consistent with the "rule of liberal construction of pleadings presented by *pro*
se litigants," particularly when dismissal is considered. Garaux, 739 F.2d at 439.

1 Plaintiff respectfully contends that the Court be leery of granting the Motion to Dismiss
2 based on Defendants affirmative defenses, which is a matter for summary judgment, and should
3 allow every opportunity to the Plaintiff, who is acting pro se, and grant this Motion for Notice of
4 Deficiency and the concurrent Motion for Permissive Joinder and Motion to Amend before
5 ruling on the Motion to Dismiss.

6 If the Court intends to proceed as if on a motion for summary judgment, a reasonable
7 opportunity to submit responsive evidence should be granted to Plaintiff before rendering
8 judgment. See Id. at 439-40; Klinge v. Eikenberry, 849 F.2d 409, at 411-12, (1988).

9 Plaintiff has specifically identified discovery that would tend to favor his factual
10 allegations in his concurrent Motion to Preserve Evidence. Plaintiff believes that this evidence,
11 and all exhibits mentioned in the original complaint, and those to be supplied in an amended
12 complaint would definitively tip the scales exponentially in his favor. Granting Plaintiff this
13 Motion and all other concurrent motions, which are definitively within this Courts judicial
14 discretion, would allow Plaintiff a decision on the constitutional merits of the instant case.

15 The 9th Circuit disfavors summary judgment where relevant evidence remains to be
16 discovered. Taylor v. Sentry Life Ins., 729 F.2d 652, 656 (9th Cir.1984) (per curiam). The Court
17 should not enter summary judgment or the Motion to Dismiss since Plaintiff has satisfied his
18 burden of justifying discovery by setting forth the particular facts that he expects to uncover
19 through discovery. Mission Indians v. American Mgmt. & Amusement, 824 F.2d 710, 716 (9th
20 Cir. 1987); Hall v. Hawaii, 791 F.2d 759, at 761, (1986), and identified specific facts tending to
21 show that the evidence sought actually exists. Visa Int'l Service v. Bankcard Holders, 784 F.2d
22 1472, 1475 (9th Cir. 1986).

23 **4. Federal Rule of Civil Procedure 15 applies in the instant motion to Plaintiff.**

24 Generally, Federal Rule of Civil Procedure 15(a) liberally allows for amendments to
25 pleadings. As neither amendment nor answer has yet been filed in the instant case, due to
26 Defendants dispositive Motion to Dismiss, the Court should allow notice of the deficiencies of
27 the original complaint to Plaintiff upon Motion for same.

28 If the Court denies Defendants Motion to Dismiss, Plaintiff has already requested of this
Court the right to amend the original complaint in his Opposition to the Motion to Dismiss, and
in his concurrent Motion for Permissive Joinder and Motion to Amend, therefore notice of
deficiencies at this time would be appropriate, timely and applicable under this rule.

1 Under Rule 15(a), “[a] party may amend the party’s pleading once as a matter of course
2 at any time before a responsive pleading is served Otherwise a party may amend the party’s
3 pleading only by leave of court . . . ; and leave shall be freely given when justice so requires.”

4 Plaintiff contends that he is filing the present motion before the Defendants have served
5 their responsive pleadings. The Defendants have not yet filed answers to the original complaint
6 as Defendants have filed a Motion to Dismiss, which is not considered a responsive pleading
7 within the meaning of Rule 15(a). Young v. Track, Inc., 324 F.3d 409, 415 n.6 (6th Cir. 2003).

8 Rule 15(a) allows amendment of the original complaint without the leave of the Court.
9 With respect to Rule 15(a), the courts are divided on the issue of whether, prior to service of a
10 responsive pleading, a party may amend its pleading under Rule 15(a) to add or drop parties
11 without first obtaining leave of court.

12 Some courts take the position that joining parties is governed by Rule 21, and that an
13 amended pleading that changes the parties requires leave of court even though it is filed before a
14 responsive pleading is served. See, e.g., Williams v. United States Postal Serv., 873 F.2d 1069,
15 1072 n.2 (7th Cir. 1989); United States ex rel. Tucker v. Thomas Howell Kiewit (USA) Inc., 149
16 F.R.D. 125, 126 (E.D. Va. 1993); International Bhd. of Teamsters v. AFL-CIO, 32 F.R.D. 441
17 (E.D. Mich. 1963).

18 Other courts and commentators, however, take the position that prior to service of a
19 responsive pleading, parties may amend pleadings under Rule 15(a) to add or drop parties
20 without leave of court. See, e.g., United States ex rel Precision Co. v. Koch Indus., Inc., 31 F.3d
21 1015, 1018-19 (10th Cir. 1994); Washington v. New York City Bd. of Estimate, 709 F.2d 792,
22 795 (2d Cir. 1983); McClellan v. Mississippi Power & Light Co., 526 F.2d 870, 872-73 (5th Cir.
23 1976), mod. in part on other grounds, 545 F.2d 919 (5th Cir. 1977); Matthews Metals Products,
24 Inc. v. RBM Precision Metal Products, Inc., 186 F.R.D. 581, 583 (N.D. Cal. 1999); 3 James Wm.
25 Moore et al., Moore’s Federal Practice § 15.16[1] at 15-54 (3d ed. 2000).

26 With respect to this Court, Plaintiff and all other Plaintiffs who are also in the process of
27 filing their Motions for Permissive Joinder and Motions to Amend at this time are not attempting
28 to amend the original complaint without leave of the Court. Plaintiff and all additional Plaintiffs
in the instant action before this Court are respectfully requesting this Court to grant them leave to
join and amend the original complaint upon their Motions to the Court at the same time to

1 promote judicial economy, and timely notice of the deficiencies of the original complaint would
2 further that goal.

3 Federal Rule of Civil Procedure 15(a)(2) provides that “[t]he court should freely give
4 leave [to amend a complaint] when justice so requires”. Fed. R. Civ. P. 15(a)(2). The district
5 court has the discretion to decide whether to grant Plaintiff leave to amend. Swanson v. U.S.
6 Forest Serv., 87 F.3d 339, 343 (9th Cir. 1996); Jordan v. County of Los Angeles, 669 F.2d 1311,
7 1324 (9th Cir.1982), vacated on other grounds, 459 U.S. 810 (1982). In its exercise of this
8 discretion, the court applies Rule 15 to “facilitate [a] decision on the merits, rather than on the
9 pleadings or technicalities.” U.S. v. Webb, 655 F.2d 977, 979 (9th Cir. 1981). Furthermore, the
10 court interprets the language for granting amendments under Rule 15 with “extreme liberality.”
11 Id.

12 When deciding whether to grant leave to amend, a court must consider: (1) whether the
13 amendment was filed with undue delay; (2) whether the movant has requested the amendment in
14 bad faith or as a dilatory tactic; (3) whether movant was allowed to make previous amendments
15 which failed to correct deficiencies of the complaint; (4) whether the amendment will unduly
16 prejudice the opposing party and; (5) whether the amendment is futile. See Eminence Capital,
17 LLC v. Aspeon, Inc., 316 F.3d 1048, 1052 (9th Cir. 2003) (citing Foman v. Davis, 371 US 178,
18 182 (1962)).

19 The five factors are not considered equally. Prejudice is the most important factor and is
20 given the most weight. *Eminence*, 316 F.3d at 1052. Therefore, “[a]bsent prejudice, or a strong
21 showing of any of the remaining *Foman* factors, there exists a presumption under Rule 15(a) in
22 favor of granting leave to amend.” Id. See also Talwar v. Creative Labs, Inc., No. CV 05-3375,
23 2007 WL 1723609 (C.D. Cal. June 14, 2006) (finding the plaintiffs should be granted leave to
24 amend because additional discovery would not unduly prejudice the defendant and the defendant
25 did not make a strong enough showing of bad faith on the part of the plaintiffs or that the
26 plaintiffs requested leave to amend as a dilatory tactic, despite the suspect timing of the filing).

27 The Ninth Circuit has also held that one of the five *Foman* factors alone is not sufficient
28 to justify the denial of a request for leave to amend. The Ninth Circuit has found that undue
delay alone “is insufficient to justify denying a motion to amend” and has “reversed the denial of
a motion for leave to amend where the district court did not provide a contemporaneous specific

1 finding of prejudice to the opposing party, bad faith by the moving party, or futility of the
2 amendment.” Bowles v. Reade, 198 F.3d 752, 758 (9th Cir. 1999).

3 **5. A reasoned look at the Five Factors as stated above:**

4 (1) whether the amendment was filed with undue delay;

5 No delay is foreseen by Plaintiff at this time due to the position the instant case is
6 in and is well within his rights pursuant to the Federal Rules to request
7 amendment at this time and of this Court. As no answer has been given to the
8 original Complaint and we are awaiting a decision on the dispositive Motion to
Dismiss, this Motion is not untimely nor inappropriate.

9 (2) whether the movant has requested the amendment in bad faith or as a dilatory
10 tactic;

11 There is no evidence of bad faith by Plaintiff at this stage of the proceeding or of
12 a dilatory tactic. In actual fact, it should allow the Court to make a more informed
13 decision on the merits, which is always favored as shown in precedent above,
14 rather than a decision based on mere technicality, as Plaintiff contends in regards
15 to the Motion to Dismiss, and the Motion to Stay Discovery by Defendants. Any
16 attempt at delay or bad faith in the instant case could be construed as detailed in
17 the concurrent Motion for Discovery Plan and Scheduling Order with Special
Scheduling Review Requested.

18 (3) whether movant was allowed to make previous amendments which failed to
19 correct deficiencies of the complaint;

20 Plaintiff has not made a previous amendment, either as a matter or right pursuant
21 to the Federal Rules nor as a request to the Court, therefore this factor is moot.

22 (4) whether the amendment will unduly prejudice the opposing party;

23 Plaintiff is allowed Permissive Joinder, Amendment, and Notice of Deficiency by
24 Federal Rule and controlling precedent and opinion. In the instant case, the
25 parties are awaiting a decision on the Defendants Motion to Dismiss and Plaintiffs
26 Opposition, amongst other Motions, and no discovery has been granted due to a
27 Motion to Stay Discovery, which has not been opposed by the Plaintiff.

28 Therefore no embarrassment, delay, expense, or other prejudice is possible or
applicable at this early stage in the proceedings. If Notice of Deficiency,

1 Permissive Joinder and Amendment of the original Complaint are granted to
2 Plaintiff by the Court at this time, and at this early stage in the proceedings, no
3 harm or prejudice to Defendants is caused by the concurrent Motions placed
4 before this Court as no answer by the Defendants has been filed.

5 (5) and; whether the amendment is futile.

6 Plaintiff is of the belief that he has stated with enough sufficiency applicable
7 grounds for his causes of action and claims for relief in his original complaint
8 pursuant to Fed. R. Civ. P. 8. The Court has discretion to grant Plaintiffs
9 concurrent Motions placed before the Court today, which is his prerogative per
10 Federal Rule, and which would alleviate the claims asserted by the Defendants
11 based on technicalities. This would allow the Court to hear the issues presented
12 on their merits, as favored by the Supreme Court and 9th Circuit in the above
13 stated precedent and opinions. This will allow for judicial economy, and will
14 allow all Plaintiffs with justiciable claims to be joined and heard. Any amendment
15 of the original complaint at this time, and with a Notice of Deficiency provided to
16 Plaintiff by the Court per precedent, would benefit the Court in reaching a
17 reasoned and well thought out opinion based on the merits of the case. Therefore
18 the concurrent Motions before the Court would not be futile.

19 **IV. CONCLUSION**

20 For the reasons as set forth above, Plaintiff respectfully requests that this Court grant the
21 Motion for Notice of Deficiency to him in the above entitled action. This is pursuant to Federal
22 Rule of Civil Procedure 15 and the attached Memorandum of Points and Authorities. Plaintiff
23 requests that the Court grant this Motion for Notice of Deficiency before rendering judgment on
24 the Motion to Dismiss filed by the Defendants. Plaintiff further request that the Court grant the
25 Motion for Permissive Joinder and Motion to Amend that is filed concurrently with this Motion,
26 and grant all Motions for Permissive Joinder filed by other parties to the instant action. Lastly,
27 Plaintiff asks the court to deny the Motion to Dismiss in its entirety as the allegations and facts
28 are of constitutional dimension and a ruling on the merits of the case should be allowed by the
Court in relation to Plaintiff and all additional Plaintiffs who are seeking to join the instant case.

AFFIRMATION PURSUANT TO FED.R.CIV.P. 5.2(a)

1 The undersigned does hereby affirm that the preceding document does not contain the
2 social security number of any person.
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4 Respectfully dated this 10th day of March, 2014.
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7 Patrick S. Davis
8 Plaintiff in Proper Person
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CERTIFICATE OF MAILING

I hereby certify as the Plaintiff in Proper Person, that on March 10, 2014, I deposited for mailing at Reno, Washoe County, Nevada, postage prepaid, a true copy of the foregoing document, Motion for Notice of Deficiency addressed to:

CATHERINE CORTEZ-MASTO
ATTORNEY GENERAL

LORI M. STORY, ESQ.
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Patrick S. Davis
Plaintiff in Proper Person