



Early Sullivan's attorneys are experienced in handling appeals across a broad spectrum of the law. We believe that there is nothing more important on appeal than the written work product.

We put in the time and extraordinary effort required to prepare meticulous and persuasive briefs, which crystallize our clients' positions and place them in the best position to win.

Since the Firm opened its doors four years ago, we have briefed and argued appeals in the California Court of Appeal, Ninth Circuit Court of Appeals, Nevada Supreme Court, High Court of American Samoa and United States District Court for the District of Nevada. Our briefs are available for review upon request.

EARLY SULLIVAN'S PENDING AND RECENT APPELLATE MATTERS

California Court of Appeal

Moorefield Construction, Inc. v. Intervest Mortgage Investment Company (Case No. E055666)

- Early Sullivan was retained to represent deed of trust holder Intervest Mortgage Investment Company for its appeal from a judgment entered after a bench trial finding that plaintiff Moorefield Construction, Inc.'s mechanic's lien was prior and senior to Intervest's deed of trust. Early Sullivan's appeal on behalf of Intervest prevailed. *Moorefield Construction, Inc. v. Intervest - Mortgage Investment Co.*, 230 Cal. App. 4th 146 (2014).

RNT Holdings, LLC v. United General Title Ins. Co. (Case No. B250089)

- After Early Sullivan litigators obtained summary judgment on behalf of United General Title Insurance Company based on Exclusion 3(a) and Condition 10(b) of the ALTA form lender's title insurance policy, Early Sullivan was retained to represent United General in plaintiff RNT Holdings, LLC's appeal from that judgment. Early Sullivan successfully defeated RNT's appeal. *RNT Holdings, LLC v. United General Title Ins. Co.*, 230 Cal. App. 4th 1289 (2014).

Santos v. First American Title Ins. Co. (Case No. E060650)

- After Early Sullivan litigators obtained a judgment of dismissal on behalf of First American Title Insurance Company, Early Sullivan was retained to again represent First American in cross-complainant Santos's appeal in this "duty to defend" case. The case resolved while the appeal was pending.

1500 Viewsite Terrace, LLC v. Pickford Escrow, Inc., et al. (Case No. B256246)

- After Early Sullivan litigators obtained summary judgment in favor of First American Title Insurance Company, Early Sullivan was retained to represent First American in plaintiff 1500 Viewsite Terrace, LLC's appeal of the trial court's judgment in this breach of title insurance policy and insurance bad faith litigation. The appeal is pending.

Nevada Supreme Court

R&S St. Rose Lenders v. Branch Banking and Trust, Co. (Case No. 56640)

- Early Sullivan was retained to represent respondent Commonwealth Title Insurance Company in seeking to uphold the trial court's interest award on an unpaid loan.

Jess Arndell Construction Co., Inc. v. Henderson et al. (Case No. 63629)

- After Early Sullivan litigators obtained a judgment of dismissal in favor of its client, Early Sullivan was retained to represent the client in the plaintiff's appeal of the trial court's interpretation of Nevada's "5-year rule."

Vintage Plaza Limited v. First American Title Insurance Co. (Case No. 65697)

- After Early Sullivan litigators obtained summary judgment at the trial court level against plaintiff Vintage Plaza Limited, First American retained Early Sullivan to represent it in Vintage Plaza's appeal from the summary judgment ruling.

JMA Architects, Inc. v. Citation Property Group (Case No. 55355)

- Early Sullivan represented developer Citation Property Group before the Nevada Supreme Court regarding the validity of JMA Architect's mechanics liens.

9th Circuit Court of Appeals

Twentieth Century Fox v. Bodo Scriba (Case No. 08-56735)

- After obtaining a judgment of dismissal for lack of personal jurisdiction on behalf of film financier Bodo Scriba, Early Sullivan represented Mr. Scriba before the Ninth Circuit Court of Appeals in Twentieth Century Fox Film Corporation's appeal from that judgment.

High Court of American Samoa, Appellate Division

Progressive Ins. Co. (Pago Pago) Ltd. v. Am. Samoa Gov't

- After obtaining a \$6.6 million judgment at trial against the American Samoa Government, Early Sullivan represented Progressive Insurance Company (Pago Pago) Ltd. in the Samoan government's appeal.

United States District Court, District of Nevada

Commonwealth Land Title Ins. Co. v. R&S St Rose, LLC (Case Nos. 2:12-cv-01615-LDG, 2:12-cv-01617-LDG, 2:12-cv-01647-LDG, 2:12-cv-01667-LDG)

- Early Sullivan was retained to represent appellant Commonwealth Land Title Insurance Company regarding a bankruptcy court order on Commonwealth's motion for substantive consolidation of several related Chapter 11 bankruptcy actions. Early Sullivan's appeal prevailed and the order was reversed.

While at his former firm, Bryan Sullivan wrote the briefing for the following published decisions:

Burkle v. Burkle, 144 Cal.App.4th 387 (2006)

Burkle v. Burkle, 141 Cal.App.4th 1029 (2006)

And Bryan participated in writing the appeals for:

In re Marriage of Burkle, 139 Cal.App.4th 712 (2006)

Burkle v. Burkle, 135 Cal.App.4th 1045 (2006)

While at his former firms, Devin McRae wrote the briefing and presented oral argument for the following decisions in the Ninth Circuit Court of Appeals and California Court of Appeal:

Desire v. Gonzales, 245 Fed.Appx. 627 (9th Cir. 2007)

Kookmin v. Super. Ct., 2005 WL 1030139, Cal. App. 4th Dist. 2005

And Devin wrote the briefing in the following matters:

Friedman v. Dangerfield, 2d Dist. Cal. Court of Appeal Case No. B200670

Smith v. Best. Am. Hospitality, 2003 WL 21689913, Cal. App. 2d Dist. 2003

While at her former firm, Allison Hyatt handled large portions of the briefing of the following decisions:

Margot Palazzo, LLC v. Los Angeles Unified School District, 2008 WL 2908753, Cal. App. 2 Dist. 2008

Taubman v U.S. Bank, 2007 WL 3087874, Cal. App. 2d Dist., 2007

In re Sneed Family Trust, 2005 WL 950001, Cal. App. 2d Dist., 2005

In re Estate of Taubman, 2004 WL 2051222, Cal. App. 2d Dist., 2004

Rio Properties, Inc. v. Armstrong Hirsch Jackoway Tyerman & Wertheimer, 254 Fed. Appx. 600, 2007 WL 3390930, C.A. 9 (Nev.) 2007

Notesan Pty. Ltd., v. WCI Cable, Inc., Ninth Circuit Court of Appeals Case No., 03-35226 (2003)

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