

1 **Code: 1075**

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8 Special Master

9 **IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

10 **IN AND FOR THE COUNTY OF WASHOE**

11
12 LAWRENCE GARVEY, AN INDIVIDUAL; AND
13 ROBERT PAYTON, AN INDIVIDUAL,

14 Plaintiff,

15 vs.

16 CLUB TAHOE RESORT OWNERS'
17 ASSOCIATION, INC., A NEVADA NON-PROFIT
18 CORPORATION; KEITH WILSON, GLORIA
19 DEALBA; DONALD WALL; ROBERT
20 VERMELTFOORT; CHRISTINA BECKER;
21 KEITH OGDEN AND MARK PEARL
(ASSOCIATION BOARD MEMBERS SUED IN
THEIR INDIVIDUAL CAPACITIES); AND DOES
1 THROUGH 10, INCLUSIVE AND ROE
CORPORATIONS I THROUGH X, INCLUSIVE,

22 Defendant

Case No.: CV25-02319

AFFIDAVIT OF E. ALAN TIRAS
PURSUANT TO NRCP 53(B)(4)

23 **AFFIDAVIT**

24 STATE OF NEVADA
25 COUNTY OF WASHOE

26 I, E. Alan Tiras, Esq., being duly sworn, depose and state as follows:
27
28

Affidavit of E. Alan Tiras pursuant to NRCP 53(b)(4) - 1

1 1. I am an attorney duly licensed to practice law in the State of Nevada. I maintain my
2 principal place of business at E. Alan Tiras P.C., 937 Tahoe Boulevard, Suite 130-B, Incline Village,
3 Nevada 89451.

4
5 2. I have been appointed as Special Master in the above-captioned action by Order of the
6 Second Judicial District Court dated April 3, 2026 (the "Order"), pursuant to NRCP 53(a)(2)(B).

7
8 3. This Affidavit is submitted pursuant to NRCP 53(b)(4), which requires a Special Master
9 to disclose whether there is any ground for disqualification under Rule 2.11 of the Revised Nevada Code
10 of Judicial Conduct ("Rule 2.11").

11 **DISCLOSURE OF POTENTIAL GROUNDS FOR DISQUALIFICATION**

12
13 4. I have carefully reviewed Rule 2.11 of the Revised Nevada Code of Judicial Conduct,
14 which sets forth the circumstances under which a judicial officer must disqualify himself or herself,
15 including circumstances involving: (a) personal bias or prejudice concerning a party or a party's lawyer;
16 (b) personal knowledge of disputed evidentiary facts; (c) prior service as a lawyer or material witness in
17 the matter; (d) financial interests in the matter or in a party; (e) close familial or personal relationships
18 with the parties, counsel, or persons with a substantial interest in the outcome; or (f) other circumstances
19 that may reasonably question the Special Master's impartiality.

20
21 5. To the best of my knowledge and belief, I have no personal bias or prejudice concerning
22 any party or any party's counsel in this action.

23
24 6. To the best of my knowledge and belief, I have no personal knowledge of any disputed
25 evidentiary facts in this action.

1 7. I have not previously served as an attorney, counsel, advisor, or material witness in this
2 matter or in any matter directly related to the present dispute involving Club Tahoe Resort Owners'
3 Association, Inc. or any of the named parties.
4

5 8. I have no financial interest in Club Tahoe Resort Owners' Association, Inc., nor in any of
6 the named parties, nor in the outcome of this litigation.
7

8 9. I have no close familial relationship, within the third degree of relationship, with any
9 party, counsel of record, or any person known to me to have a substantial interest in the outcome of this
10 proceeding.
11

12 10. I am not aware of any other circumstance that might reasonably call into question my
13 impartiality or otherwise constitute a ground for disqualification under Rule 2.11 of the Revised Nevada
14 Code of Judicial Conduct.
15

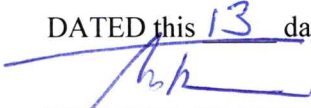
16 11. I am familiar with the duties assigned to me under the Order and I am able and willing to
17 serve as Special Master in this action. I will proceed with all reasonable diligence in the performance of
18 my duties, with a view to avoiding disputes wherever possible, and to resolving any disputes as quickly
19 and inexpensively as possible, in accordance with the Order.
20

21 12. I understand and accept that this Affidavit may be relied upon by the Court and the
22 parties in connection with my service as Special Master in this action.
23

24 13. I understand my continuing obligation to promptly disclose to the Court and to all parties
25 any circumstances that arise during my service as Special Master that might give rise to a ground for
26 disqualification under Rule 2.11 or that might otherwise call into question my impartiality.
27
28

1 I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true
2 and correct.

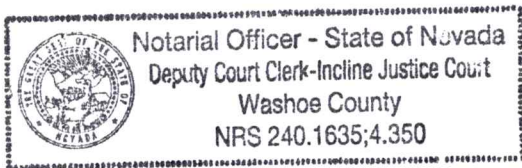
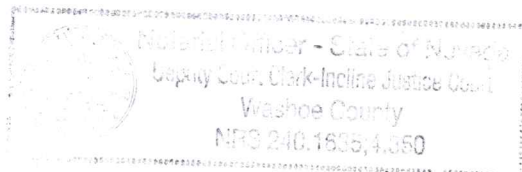
3 DATED this 13 day of April, 2026.

4 
5 E. Alan Tiras, Esq.
6 E. Alan Tiras P.C.
7 937 Tahoe Boulevard, Suite 130-B
8 Incline Village, Nevada 89451

9 SUBSCRIBED AND SWORN to before me this 13 day of April, 2026.

10 Steven F Brooks
11 Notary Public in and for the State of Nevada

12 My Commission Expires: 01/01/2031



**SECOND JUDICIAL DISTRICT COURT
COUNTY OF WASHOE, STATE OF NEVADA**

LAWRENCE GARVEY, an individual; and ROBERT PAYTON, an individual,
Plaintiffs,

v.

CLUB TAHOE RESORT OWNERS' ASSOCIATION, INC., a Nevada non-profit corporation; KEITH WILSON, GLORIA DEALBA; DONALD WALL; ROBERT VERMELTFOORT; CHRISTINA BECKER; KEITH OGDEN AND MARK PEARL (Association Board Members Sued In Their Individual Capacities); and DOES 1 through 10, inclusive and ROE CORPORATIONS I through X, inclusive,
Defendants.

Case No.: CV25-02319

Dept. No.: 9

**AFFIRMATION
Pursuant to NRS 239B.030**

The undersigned does hereby affirm that the preceding document,

Affidavit of E. Alan Tiras, Esq. Pursuant to NRCP 53(b)(4)

filed in case number: CV25-02319

☒ **Document does not contain the personal information of any person.**

—OR—

☐ Document contains the personal information of a person as required by:

☐ A specific state or federal law, to wit:

(State specific state or federal law)

☐ For the administration of a public program

☐ For an application for a federal or state grant

☐ Confidential Family Court Information Sheet (NRS 125.130, NRS 125.230 and NRS 125B.055)

Date: April 14, 2026


(Signature)

E. ALAN TIRAS
(Print Name)

SPECIAL MASTER
(Title / Capacity)