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DISTRICT COURT
CLARK COUNTY, NEVADA

ANDREA COLLIER, as trustee of the JACT
TRUST,

Plaintiff,

v.

PENNIE MOSSETT-PUHEK, individually;
ANTHEM HIGHLANDS COMMUNITY
ASSOCIATION, a Nevada Non-Profit Corporation;
CARMEN EASSA, an individual; K.G.D.O.
HOLDING COMPANY, LLC d/b/a TERRA
WEST MANAGEMENT SERVICES, a Nevada
limited liability company; DOES I through X and
ROE BUSINESS ENTITIES I through X,
inclusive,

Defendants.

Case No.: A-22-852032-C
Dept.: 8

**APPENDIX OF EXHIBITS IN SUPPORT
OF PLAINTIFF ANDREA COLLIER'S
OPPOSITION TO MOTION FOR
SUMMARY JUDGMENT MOTIONS**

Exhibit No.	Description	Page Nos.
1	Defendant Pennie Mossett-Puhek's ("Mossett-Puhek") Response to Plaintiff's First Set of Interrogatories dated March 31, 2023.	1 – 13
2	Deposition Transcript of Jason Esau taken on September 27, 2022.	14 – 49
3	Code Enforcement Case No. 22-625625 reflecting Plaintiff Andrea Collier ("Collier") was not in violation of any code provision regarding her oleander bushes.	50 – 51
4	Defendant Anthem Highlands Community Association's ("AHCA") Response to Collier's First Set of Interrogatories dated March 31, 2023.	52 – 69
5	Deposition Transcript of Shirley Breeden taken on June 26, 2023.	70 – 118
6	Deposition Transcript of Sydney Woo taken on June 28, 2023.	119 – 180
7	Building Permit Records for the Flag Pole dated August 19, 2022.	181 – 198

1	8	AHCA Board of Directors Meeting Minutes from May 2020 through July 2020.	199 – 209
2	9	AHCA Board of Director Mossett-Puhek’s Candidate Statement dated April 26, 2021.	210 – 211
3	10	Third ADR Claim to NRED dated July 26, 2023.	212 – 219
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21	28	Email Exchange between Collier and Woo in April 2021.	873 – 879
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35	Invoice from Beat The Heat.	923 – 924
36	Examples of Flagpoles following Enforcement against Collier.	925 – 932
37	Collier's First Set of Requests for Production of Documents to K.G.D.O. Holding Company dated May 8, 2024.	933 – 948
38	Exhibit 5 to Eassa's Deposition Transcript P00245.	949 – 950
39	Correspondence regarding Natalia Dubois	951 – 960
40	AHCA Board of Directors Meeting Minutes and related documents from 2016 through 2017.	961 – 981
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42	2018 Damales TPO Application	985 – 997
43	Excerpt of documents from Master HOA	998 – 1007
44	Email dated June 18, 2021	1008 – 1010
A	Declaration of Andrea Collier	1011 – 1015
B	Declaration of Timothy Elson, Esq.	1016 – 1022

DATED: August 2nd, 2024

Respectfully Submitted,

THE LAW OFFICES OF TIMOTHY ELSON

By: /s/ Timothy Elson

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CERTIFICATE OF SERVICE

The undersigned, an employee of the law firm of The Law Offices of Timothy Elson, hereby certifies that on August 2, 2024, she served a copy of the foregoing **APPENDIX OF EXHIBITS IN SUPPORT OF PLAINTIFF ANDREA COLLIER'S OPPOSITION TO MOTION FOR SUMMARY JUDGMENT MOTIONS** by electronic service through the Regional Justice Center for Clark County, Nevada's ECF System:

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