

**No. 23-3227**  
**Cross Appeal Case No. 23-3390**  
**No. 24-159**

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*In the*  
**UNITED STATES COURT OF APPEALS**  
*for the*  
**NINTH CIRCUIT**

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WEALTHY, INC. AND DALE BUCZKOWSKI,

*Plaintiffs-Appellants,*

v.

SPENCER CORNELIA, CORNELIA MEDIA LLC, AND  
CORNELIA EDUCATION LLC,

*Defendants-Appellees.*

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On Appeal from the  
United States District Court for the District of Nevada  
No. 2:21-cv-01773-JCM-EJY, consolidated with  
No. 2:22-cv-00740-JCM-EJY  
Honorable James C. Mahan, United States District Judge

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**APPELLEES' OPPOSITION TO MOTION TO STAY MANDATE  
PENDING PETITION FOR CERTIORARI**

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Defendants-Appellees Spencer Cornelia, Cornelia Media, LLC, and Cornelia Education, LLC (collectively, “Appellees”) oppose Plaintiff-Appellants Wealthy Inc. and Dale Buczkowski’s (“Appellants”) Motion to Stay Mandate Pending Petition for Certiorari (ECF 84).

## **1.0 INTRODUCTION AND BACKGROUND**

Appellants filed the instant Motion as a delay tactic. Appellees have no objection to the stay if it comes with a requirement that Appellants post a bond of \$600,000, the amount of attorneys’ fees to which Appellees will likely be entitled when the mandate issues. That would be both just and proper, and will greatly limit litigation practice after Appellants’ futile petition for certiorari is denied. *See* Fed. R. Civ. P. 1 (stating that the rules of civil procedure “should be construed, administered, and employed by the court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding”). Accordingly, Appellees’ first choice of result here would be to grant the stay conditioned on the posting of a bond. Appellees do not consent to the stay absent the posting of a bond, and if this Honorable Court will not impose the bond, then Appellees request that the Court recognize the Motion as frivolous and deny it.

## **2.0 LEGAL STANDARD**

Fed. R. App. P. 41(d)(1) requires Appellants to show “1) a reasonable probability that four members of the Supreme Court would consider the underlying issue sufficiently meritorious for the grant of certiorari; 2) a significant possibility of reversal of the lower court’s decision; and 3) a likelihood that irreparable harm will result if that decision is not stayed.” *Epic Games, Inc. v. Google LLC (In re Google Play Store Antitrust Litig.)*, 152 F.4th 1078, 1081 (9th Cir. 2025).

Plaintiffs fail to meet any of these requirements, if for no other reason than because they never raised the issue underlying their cert petition until this very Motion.

## **3.0 ARGUMENT**

### **3.1 A Bond Will Resolve This Issue**

Fed. R. App. P. 41(d)(3) provides for a bond or other security as a condition to granting a stay of a mandate. *California v. American Stores Co.*, 492 U.S. 1301, 1304 (1989). Federal courts have likened a motion seeking to stay the mandate as equivalent to a motion for a temporary injunction, as “[a] stay is a form of temporary injunction, and in general is governed by the same principles . . . .” *United States v. Holland*, 1 F.3d

454, 456 (7th Cir. 1993) (quoting Robert L. Stern et al., Supreme Court Practice § 17.19 (6th ed. 1986)). And like any party seeking a preliminary injunction, it is appropriate for the Court to require Appellants to “give[] security in an amount that the court considers proper to pay the costs and damages sustained by any party found to have been wrongfully enjoined or restrained.” Fed. R. Civ. P. 65(c). Here, the required security should be linked to the attorneys’ fees Appellees are likely to recover.

Appellees, under NRS 41.670, are entitled to their reasonable attorneys’ fees incurred in connection with all of Appellants’ state law claims. They will also likely be entitled to all fees in connection with Appellants’ Lanham Act claim under 15 U.S.C. § 1117 given its weakness, as shown in part by the fact Appellants did not bother to seek rehearing on it. At the District Court, Appellees filed a motion for costs and fees, requesting a total of \$304,641.88 in fees and \$26,007.50 in non-taxable costs for their expert witness. Dist. Ct. ECF 258 at 12. Since then, Appellees incurred an additional \$200,813.28 in attorneys’ fees. Declaration of Alex J. Shepard (“Shepard Dec.”), attached as **Exhibit 1**, at ¶ 5. This number will only increase as Appellees are required to brief a fee motion in the district court and potentially respond to Appellants’

cert petition (however, the likelihood that a reply brief will be requested is unlikely). This amount has also begun to accrue interest at the rate of 3.5% now that Appellants are unconditionally entitled to a fee award. *See Friend v. Kolodziejczak*, 72 F.3d 1386, 1391-92 (9th Cir. 1995) (holding that “interest runs from the date that entitlement to fees is secured, rather than from the date that the exact quantity of fees is set”). Accordingly, it would be appropriate for the Court to condition a stay of the mandate on Appellants posting a bond of \$600,000.

This is an amount Appellants should be able to cover easily. Appellants are extremely successful public figures within the wealth coaching industry. They claimed economic damages, represented by loss of customers due to Appellants’ statements, far in excess of the requested bond even using conservative estimates. *See* ER-284. Appellants provide financial training programs for as much as \$75,000 per person. Dist. Ct. ECF 1 at ¶¶ 16-19. Appellants alleged that Wealthy Inc. “is a leading entrepreneurship, finance, business, real-estate and self-improvement company . . . .” *Id.* at ¶ 15. Absent some proof of economic hardship, which could not be shown without committing perjury at this point, the Court should presume Appellants can easily post the requested bond.

Second, posting the bond will help ensure that Appellants actually pay the fee award eventually entered against them. Appellants are not trustworthy. They engage in shifty business practices generally, as outlined in various unrebutted statements within Appellees' videos. *See* ECF 23 at 27-32; 1-SER-39-40 at 175:11-176:23. One of Buczkowski's companies, Larson Consulting, provided a false address to the Nevada Secretary of State and listed its address on tax returns as the primary residence of Carlos Huerta, an individual who had nothing to do with the company. Cor-FER-041 and Cor-FER-045 at 101:4-10, 147:14-23. And as the District Court found, despite Buczkowski claiming to be a Nevada resident for the entirety of the litigation below, "[d]eposition testimony from the owner of his alleged residence [stated that he] merely visits occasionally and has some mail delivered to a Nevada address." Dist. Ct. ECF 232 at 6. The owner further testified that, when he was in Vegas, Buczkowski would often stay at hotels or "his girlfriend's parents' house . . . ." 1-SER-066. He has no apparent fixed address. Given this suspicious behavior and Buczkowski's lack of candor and lack of any apparent moral objection to misleading the parties and the courts for years on end, it is fair to assume that Appellants will fraudulently attempt to frustrate and

evade collections efforts. Requiring Appellants to post a bond will prevent any such machinations while a stay is in place.<sup>1</sup> And in the unlikely event the Supreme Court actually sides with Appellants, they will be able to recover any costs associated with posting the bond.

It is particularly likely that Appellants will attempt to fraudulently frustrate collections efforts in light of their unreasonable conduct at the District Court. Appellants provided documents about their customers, then refused to answer deposition questions about those customers, thus necessitating a motion to compel that Appellees won. Dist. Ct. ECF 45-1 at ¶¶ 12-13; Dist. Ct. ECF 45-2 at 134-139, 149-150, & 154-160; Dist. Ct. ECF 63. When Appellants refused to work with Appellees' counsel to arrange dates for a continued deposition pursuant to the order granting the motion to compel, Appellees had to file *another* motion to compel (Dist. Ct. ECF 64), which the District Court also granted (Dist. Ct. ECF 76). Once Appellees learned that Buczkowski had likely been lying for the entire case about his state of residence, Appellants refused to consent to an extension of discovery to follow up on this revelation, necessitating

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<sup>1</sup> That said, if a bond is imposed, it is nearly certain that the Appellants will decline to post the bond, because they know the futility of their position as well as anyone.

additional motion practice resulting in the District Court granting an extension. Dist. Ct. ECFs 44, 50, 55, & 63. When Appellees tried to consolidate their case with the suit Appellants later filed against John Mulvehill and his companies when the facts were inextricably intertwined (the case was about Cornelia interviewing Mulvehill), Appellants refused to stipulate to consolidation, requiring yet more motion practice and the District Court granting Appellees' motion. Dist. Ct. ECFs 43, 47-48, & 94. In a final act of pettiness, after the District Court granted summary judgment in Appellees' favor, Appellants' counsel strategically refused to tell Appellees' counsel whether they planned to appeal and refused to consent to staying the deadline to file a fee motion. Dist. Ct. ECF 251-1 at ¶¶ 5-6. Appellants knew they were going to appeal, but were deliberately non-responsive because Appellees' deadline to file a fee motion, which required significant work, was before Appellants' deadline to file a notice of appeal. Where Appellants had an opportunity to behave in a dilatory or dishonest manner, they never failed to take advantage of that opportunity.

Given Appellants' clear pattern of conduct that is of record, it is certain they will engage in additional chicanery to make Appellants

spend even more time and money to be made whole, as is the goal of all SLAPP plaintiffs.

### **3.2 The Supreme Court Will Not Grant Certiorari<sup>2</sup>**

#### **3.2.1 Appellants Waived Arguments Supporting a Petition for Certiorari by Making them for the First Time in the Instant Motion**

Even if Appellants' legal position was not frivolous, they intend to raise it for the first time on a petition for certiorari. Appellants never raised this argument before and cannot make it here for the first time. It is well known that, absent exceptional circumstances, a party cannot raise an argument for the first time on appeal. *See, e.g., G & C Prods. LLC v. Rusic*, 902 F.3d 940, 950 (9th Cir. 2018) (stating that “[a] party’s unexplained failure to raise an argument that was indisputably available below is perhaps the least ‘exceptional’ circumstance warranting our exercise of this discretion” to entertain arguments brought for the first time on appeal). The Supreme Court will not entertain this late argument, either. *See Park Ave Inv. & Dev., Inc. v. Barkheimer*, 471 U.S. 1108, 1109 (1985) (holding that it does not consider constitutional

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<sup>2</sup> This analysis applies equally to the “significant possibility of reversal” requirement, as Appellants do not separately discuss that factor in their Motion.

arguments that were not properly presented below); *United States v. Ortiz*, 422 U.S. 891, 898 (1975) (declining to consider issue raised for the first time in petition for certiorari).

Appellants' only explanation for not previously bringing up the applicability of Anti-SLAPP statutes in federal court is that doing so would have been futile, citing *Carr v. Saul*, 593 U.S. 83 (2021). ECF 84 at 22. This is a faulty argument for two reasons: (1) This Court was free to reverse its precedent on applying the fee shifting provision of the Nevada Anti-SLAPP law in federal court, yet Appellants did not raise this issue in their district court nor appellate briefing; and (2) *Saul* is completely unrelated to Appellants' argument. It dealt with exceptions to the requirement that *administrative remedies* must be exhausted before filing a lawsuit challenging administrative actions. *Saul*, 593 U.S. at 92-93. Appellants are comparing apples to orangutans.

But even in this specific context, there is no dissent among the circuits. Appellants are not the first SLAPP plaintiffs to decide to make a desperate play to avoid the fee-shifting provisions of an Anti-SLAPP law once they finally accepted the reality that they had lost the case. *See Parekh v. CBS Corp.*, 820 F. App'x 827, 836 (11th Cir. 2020) ("Mr. Parekh

argues, for the first time on appeal, that Florida's anti-SLAPP statute should not be applied in federal court. He forfeited this argument, however, by not raising it before the district court.”); *Tobinick v. Novella*, 848 F.3d 935 (11th Cir. 2017) (Plaintiff who lost a California Anti-SLAPP application in federal court waived the argument when it was raised for the first time on appeal); *NCDR, L.L.C. v. Mauze & Bagby, P.L.L.C.*, 745 F.3d 742, 752 (5th Cir. 2014) (Texas anti-SLAPP loser could not raise *Erie* doctrine for the first time on appeal). Appellants are throwing a tantrum after having definitively lost their case. The Court should not slow things down further to accommodate them.

### **3.2.2 Appellants’ Alleged Circuit Split Regarding Burdens of Proof is a Non-Sequitur**

Appellants’ Motion rests on a theory that the Supreme Court will grant their proposed petition for certiorari because of “a sharp and well-recognized circuit split...” regarding whether “state anti-SLAPP special motions to dismiss that alter the burden of proof are applicable in federal court.” ECF 84 at 5-6. Appellants’ premise is baseless because the dismissal of their claims had nothing to do with any altered burden of proof standard. Appellants’ claims were dismissed by summary judgment

under Fed. R. Civ. P. 56. *See* ECF 83 at 10-12. Appellants' own Motion concedes this fact.

The Court further reversed the denial of the Cornelia Defendants' anti-SLAPP motion, holding that the Cornelia Defendants satisfied both prongs of Nevada's anti-SLAPP framework: they demonstrated good faith communication on an issue of public concern, and ***the second prong "collapsed" into the summary judgment standard under Fed. R. Civ. P. 56, thereby reversing the district court's denial of the anti-SLAPP motion.*** This Court noted that reversal of the anti-SLAPP denial was not mooted by summary judgment because a successful movant under Nevada anti-SLAPP has "the right to mandatory fee shifting, additional discretionary awards, and filing of a separate action for compensatory and punitive damages". Order (Dkt. 83.1), at 7 n.1 (citing Nev. Rev. Stat. §41.670(1)(a)–(b)).

ECF 84 at 7 (emphasis added).

Even if Appellants' claims had been dismissed pursuant to Nevada state law, rather than the Federal Rules, no burden-shifting occurs in federal court generally, and it did not here, because the parties, the District Court, and this Court all disclaimed any form of burden-shifting. Appellants' discussion of *other* Anti-SLAPP statutes that impose an "additional hurdle" on plaintiffs is off the mark. Such hurdles do not exist in federal court; the only additional requirement imposed by Nevada's Anti-SLAPP law is the *movant's* burden to show a claim is based upon conduct that qualifies for protection under NRS 41.637. As applied by the

District Court and this Court, the Anti-SLAPP law did not affect Appellants' burden in any way. The Supreme Court is not going to grant cert on a position that would be nothing more than an advisory opinion.

### **3.2.3 Anti-SLAPP Laws are Not Interchangeable, and There is No Circuit Split Regarding Nevada's Law or Entitlements to Anti-SLAPP Fees**

There is no circuit split about whether “Anti-SLAPP laws do not apply in Federal Court” because no Anti-SLAPP law is identical. Florida's, for example, has two-way fee shifting and no procedural elements to it at all. *See* Fla. Stat. § 768.295. California's has a 60-day time limit (Cal. Code Civ. Proc. § 425.16(f)), which is procedural, but it also has substantive portions, like fee shifting (*id.* at § 425.16(c)). This Court has had the intellectual ability to separate the procedural from the substantive portions like the 60-day time limit. *Sarver v. Chartier*, 813 F.3d 891, 900 (9th Cir. 2016) (finding that 60-day time limit collided with more permissive timing requirements of Fed. R. Civ. P. 56). Courts in this Circuit also recognize that the stay on discovery in the California statute does not apply in federal court. *Metabolife Int'l v. Wornick*, 264 F.3d 832, 846 (9th Cir. 2001). At the risk of duplicating briefing already provided in Appellees' Petition for Rehearing, the state procedural stay on

discovery is inapplicable, while the fee-shifting substantive element remains intact. *Gopher Media LLC v. Melone*, 154 F.4th 696, 707-08 (9th Cir. 2025) (Bennet, J., concurring).

And while there has been much ink spilled over whether the California Anti-SLAPP statute and its entitlement to attorneys' fees is substantive, all resulting in California's fee-shifting remaining intact, no such dispute exists regarding Nevada's law; NRS 41.650 provides that a movant is "immune from any civil action for claims based upon" qualifying communications. The state law thus, somewhat uniquely among Anti-SLAPP laws, creates a *substantive immunity* that is lost if the right to attorneys' fees does not apply in federal court. Courts have routinely found that state fee-shifting laws are substantive and apply in federal court. See *Alaska Rent-A-Car, Inc. v. Avis Budget Grp., Inc.*, 738 F.3d 960, 973 (9th Cir. 2013) ("The Supreme Court held in *Alyeska Pipeline Service Co. v. Wilderness Society* that for *Erie Railroad Co. v. Tompkins* purposes, state law on attorney's fees is substantive, so state law applies in diversity cases"); *Cohen v. Beneficial Indus. Loan Corp.*, 337 U.S. 541, 555-56 (1949) (holding that a state law that "create[d] a new liability where none existed before" was substantive). Failing to

apply fee-shifting in federal court would not only be brand-new precedent with nothing behind it, it would be a policy nightmare that would incentivize forum shopping. *Godin v. Schencks*, 629 F.3d 79, 92 (1st Cir. 2010) (“were [the anti-SLAPP provisions] not to apply in federal court, the incentives for forum shopping would be strong: electing to bring state-law claims in federal as opposed to state court would allow a plaintiff to . . . circumvent any liability for a defendant's attorney's fees or costs”); *United States ex rel. Newsham v. Lockheed Missiles & Space Co.*, 190 F.3d 963, 973 (9th Cir. 1999) (“Conversely, a litigant otherwise entitled to the protections of the Anti-SLAPP statute would find considerable disadvantage in a federal proceeding,” which would “run squarely against the ‘twin aims’ of the *Erie* doctrine”).

The only portion of Nevada’s Anti-SLAPP statute that was employed in this case was the unambiguous substantive right requiring Plaintiffs to pay Appellees’ attorneys’ fees. If the Supreme Court were actually inclined to find that Anti-SLAPP laws categorically do not apply in federal court, this would be the least likely case they would ever grant, considering that substantive fee-shifting is the only Anti-SLAPP issue relevant to this appeal. Moreover, Appellants have not identified any

circuit split about whether Anti-SLAPP fee-shifting provisions, specifically, apply in federal court, nor have they cited any cases involving a circuit split over whether Nevada's Anti-SLAPP law applies in federal court. There is no likelihood of certiorari being granted.

### **3.3 Appellants Would Suffer No Harm Without a Stay**

Appellants' irreparable harm argument is entirely contained within a single sentence claiming that "proceedings on remand – including mandatory attorney's fees under NRS § 41.670 as per the Order – [] would cause immediate and irreparable harm to Plaintiffs." ECF 84 at 23. This is an admission that money is the only thing at stake here and there is nothing irreparable about the alleged harm. The possibility of having to engage in motion practice that could be mooted by a subsequent appellate decision is not irreparable harm. *See Pers. Web Tech., LLC v. EMC Corp.*, No. 5:1-cv-01358-EJD, 2020 U.S. Dist. LEXIS 57441, \*6 (N.D. Cal. Apr. 1, 2020). "Mere litigation expense, even substantial and unrecouped cost, does not constitute irreparable injury." *Renegotiation Bd. v. Bannerkraft Clothing Co*, 415 U.S. 1, 24 (1974). Appellants have failed to make any showing on this element, and the Court should deny their Motion.

#### 4.0 CONCLUSION

For the aforementioned reasons, the Court should deny Appellants' Motion. If the Court is inclined to grant the Motion, it should condition any stay on Appellants posting a bond for \$600,000.

Date: March 5, 2026.

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/s/ Alex J. Shepard

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*Attorneys for Appellees*

**UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT**

**Certificate of Compliance**

**9th Cir. Case Number:** 23-3227; 23-3390; 24-159

I am the attorney or self-represented party.

I certify that pursuant to Circuit Rule 27, the attached Opposition to Motion to Stay Mandate Pending Petition for Certiorari is (select one):

Prepared in a format, typeface, and type style that complies with Fed. R. App. P. 32(a)(4)-(6) and **contains the following number of words: 3,199.**

**OR**

In compliance with Fed. R. App. P. 32(a)(4)-(6) and does not exceed 15 pages.

**Date: March 5, 2026.**

**Signature: s/ Alex J. Shepard**

(use "s/[typed name]" to sign electronically filed documents)

## CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2026, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate ACMS system.

Participants in the case who are registered ACMS users will be served by the appellate ACMS system.

Date: March 5, 2026.

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