Electronically Filed
8/30/2025 9:01 AM
Steven D. Grierson
CLERK OF THE COURT

LUBA DACE
[redacted]
Pro Per

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

LUBA DACE, Plaintiff, v. MELVIN GRIMES, BEN CHILDS, LAW OFFICE OF BENJAMIN B. CHILDS, MARY PERRY Defendants.	Case No.: A-25-922833-C Dept. No.: 29 **PLAINTIFF'S CONSOLIDATED NOTICE OF CLARIFICATION REGARDING CLAIMS AGAINST DEFENDANTS CHILDS AND GRIMES**

Plaintiff respectfully gives notice to the Court and all parties that, for purposes of the pending motion(s) to dismiss and related briefing:

1. **Defendant Benjamin B. Childs.** Plaintiff is not pursuing the following counts against Defendant Childs as pleaded in the Third Amended Complaint. Plaintiff limits her claims against Childs to **Count I (Professional Negligence/Legal Malpractice, including Breach of Fiduciary Duty)** and **Count II (Fraud/Intentional Misrepresentation)**, as reflected in the proposed Fourth Amended Complaint.

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2. **Defendant Melvin Grimes.** Plaintiff is not pursuing the following counts against Defendant Grimes as pleaded in the Third Amended Complaint: civil conspiracy, fraud/intentional misrepresentation, concert of action, or any other claims apart from abuse of process. Plaintiff limits her claims against Grimes to **Count III (Abuse of Process, Family Court Proceedings)**, as reflected in the proposed Fourth Amended Complaint.

This notice is filed to promote judicial economy and to narrow the issues while Plaintiff's motion for leave to amend remains pending. This filing is not a voluntary dismissal under NRCP 41(a)(1), and no dismissal is sought or effected by this notice. Upon the Court's grant of leave, the Fourth Amended Complaint will supersede prior pleadings as the operative complaint.

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that on the 30th day of August 2025, I served a true and correct copy of the foregoing **PLAINTIFF'S CONSOLIDATED NOTICE OF CLARIFICATION REGARDING CLAIMS AGAINST DEFENDANTS CHILDS AND GRIMES** by placing the same in the U.S. Mail, postage prepaid, addressed as follows:

Melvin Grimes
1888 Fairfield Terr [redacted]

Mary Perry
601 N Pecos [redacted]

Dated this 30th day of August 2025.

/s/Luba Dace

LUBA DACE, Plaintiff, Pro Per