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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, BENJAMIN CHILDS, LAW OFFICE OF BENJAMIN B. CHILDS, ROBERTS STOFFEL FAMILY LAW GROUP,

Defendants.

Case No.: A-25-922833-C
Dept. No.: 29

PLAINTIFF'S NOTICE OF NO OPPOSITION BY DEFENDANT GRIMES TO PLAINTIFF'S MOTION FOR LEAVE TO FILE FOURTH AMENDED COMPLAINT

Plaintiff Luba Dace, appearing in proper person, hereby gives notice that Defendant Melvin Grimes has not filed any written opposition to Plaintiff's Motion for Leave to File Fourth Amended Complaint, which was filed and served on August 15, 2025.

The Notice of Motion advised that a written opposition must be filed within ten (10) judicial days plus 3 days for service by mail. The opposition deadline therefore expired on September 2, 2025, and no opposition by Defendant Grimes has been filed or served as of the date of this Notice. See EDCR 2.20(e) (failure to timely serve and file a written opposition may

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be construed as consent to granting the motion). For avoidance of doubt, Defendant Grimes's separate filing on August 29, 2025, is a special motion to dismiss under NRS 41.660 and does not constitute an opposition to Plaintiff's motion to amend.

Accordingly, Plaintiff respectfully requests that the Court deem the Motion for Leave to File Fourth Amended Complaint unopposed as to Defendant Grimes and grant the motion pursuant to EDCR 2.20(e).

DATED: September 3, 2025.

Respectfully submitted,

/s/ Luba Dace

Luba Dace, Plaintiff Pro Per

[redacted]

[redacted]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON OR AROUND THE 3RD DAY OF SEPTEMBER 2025, I CAUSED A TRUE AND CORRECT COPY OF THE FOREGOING **PLAINTIFF'S NOTICE OF NO OPPOSITION BY DEFENDANT GRIMES TO PLAINTIFF'S MOTION FOR LEAVE TO FILE FOURTH AMENDED COMPLAINT** TO BE SERVED UPON ALL PARTIES BY:

- **Electronic service** through the Court's e-filing system (Odyssey File & Serve), addressed to counsel of record; and

to: DATED this 3rd day of August 2025.

/s/Luba Dace

Luba Dace, Plaintiff Pro Per