No. 21-1061

In The
Supreme Court of the United States

ORIGINAL

COURTNEY KRISTEK,

Petitioner,

v.

THE TRAVELERS HOME & MARINE INSURANCE COMPANY; HARTFORD ACCIDENT & INDEMNITY COMPANY; 360 INSURANCE & INVESTMENTS, LLC DBA 360 INSURANCE,

Respondents.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

PETITION FOR WRIT OF CERTIORARI

COURTNEY DOLAN KRISTEK
PETITIONER
Appearing pro se for this writ
c/o DOLAN LAW GROUP, LTD.
5940 South Rainbow Boulevard
Las Vegas, NV 89118
Telephone: (702) 396-0910
Email: courtney@dolanlawlasvegas.com
COURTNEY KRISTEK aka COURTNEY DOLAN
Lower courts Attorney, not licensed with
US Supreme Court

LANTAGNE LEGAL PRINTING
801 East Main Street Suite 100 Richmond, Virginia 23219 (800) 847-0477

Questions Presented

Ninth Circuit affirmed jurisdiction over two insurance companies, one insurance agency, and the insured, Petitioner, when there is no complete diversity between the parties. Both lower courts agree that the parties are non-diverse. Specifically, Petitioner, Courtney Kristek, (hereinafter "Courtney" and her designated Hartford Insurance Agent, 360 Insurance Agency are both Nevada residents. There is also no federal question at issue. This is unrefuted. Yet, both lower courts fictionally finds jurisdiction when none exists. Ninth Circuit's findings that it has jurisdiction over this case conflicts with federal statutes, US Constitution, US Supreme Court precedence, and its own circuit as well.

Ninth Circuit affirmed that the removal was timely, and that the district court is allowed to not accommodate Courtney because of her disability for a hearing, and that the district court is not biased against Courtney, a female, by claiming that she is committing fraud by using her maiden name professionally, and her married name privately as both a party and counsel of record in the lower court proceedings. Ninth Circuit finds that the district court can discriminate against a person based gender and disability. Ninth Circuit's order violates US Supreme Court's precedence, the Americans With Disabilities Act, making the lower court's rulings in complete conflict with federal statutes, its own circuit, the United States Constitution, and

Ninth Circuit affirmed the district court's ruling when there was never a hearing for the 3 subject motions to dismiss along with the Ninth Circuit appeal. Ninth Circuit rules that parties are not entitled to hearings, ignoring Courtney's due process rights. Ninth Circuit granted Courtney's request for a hearing, but then initially denied her ADA request for a remote hearing to then grant the accommodation and then reverse course again and cancel the hearing. 42 U.S.C Sections 12101-12213. Ninth Circuit created new findings and cited new cases that are not a part of the record or the briefs, which is also a 14th Amendment due process violation. Ninth Circuit is in conflict with US Constitution, this Honorable Court's precedence, its own circuit, and all of the other circuit courts in this country.

Many issues of this case are in conflict with the Ninth Circuit, and the other circuits, including the issues of gender and disability discrimination. Furthermore, these same issues are of first impression to the Ninth Circuit and to the US Supreme which ultimately warrants the granting of this instant Writ Certiorari.

The five questions presented are:

1) Does the Petitioner have to disclose her specific disability to request a reasonable accommodation to the lower courts for a remote hearing under the Americans With Disability Act, 42 U.S.C Sections 12101-12213 and does it violate public policy?

2) Do the lower courts violate Petitioner's constitutional rights and public policy when they rule that she is not entitled to use her married and maiden name at the same time when fully disclosed at the start of the instant lawsuit?

3) Can jurisdiction be asserted over a party, Petitioner, when the parties are non-diverse and there is no federal question matter before the lower courts in a case and the removal is untimely? 28 U.S.C. Sections 1331 and 1332.

4) Can jurisdiction be asserted over a party when a petition for removal is not properly served, and is an order to dismiss a legitimate case in its entirety constitutional when a hearing never took place with all of the parties present? U.S. Constitution, 14th Amendment.

5) Are court orders constitutional and do not violate public policy when they interfere in Petitioner's constitutional right to appeal her case when no jurisdiction exists in the lower courts? Id, Fed. Rules Appel. Proced. 4,

List of Parties

The parties are properly listed in the above caption.

Corporate Disclosure Statement

The Petitioner is a private citizen, who only owns ownership interest of Dolan Law Group, Ltd., who is the law firm listed in the lower courts' records.

TABLE OF CONTENTS

TABLE OF AUTHORITIES

CASES

STATUTES AND OTHER AUTHORITIES

Opinions Below

Initial opinion for the United States Court of Appeals Ninth Circuit is reported at Kristek v. Travelers Insurance, 20-17072 (9th Cir. 10/21/21). A petition for rehearing was denied on November 4, 2021. Petition for Rehearing was denied in 2 days, and it was not cited. Ninth Circuit Court of Appeals affirmed the decision of the United States District Court of Nevada, with the trial court's decision issued on October 7, 2020, which is case 2:20-cv-01314-JAD-DJA. (See Appendix 1a-38(a).

Statement of Jurisdiction

Jurisdiction in this case is proper under 28 U.S,C.1254(1). The Ninth Court of Appeals issued their opinion on 10/21/21. A timely petition for rehearing was denied on November 4, 2021.

Constitutional and Statutory Provisions Involved

Title 42, United States Code, Sections 12101-12213

Americans With Disabilities Act "ADA"

(a) Findings. The Congress finds that—

(1) physical or mental disabilities in no way diminish a person's right to fully participate in all aspects of society, yet many people with physical or mental disabilities have been precluded from doing so because of discrimination; others who have a

record of a disability or are regarded as having a disability also have been subjected to discrimination;

(2) historically, society has tended to isolate and segregate individuals with disabilities, and, despite some improvements, such forms of discrimination against individuals with disabilities continue to be a serious and pervasive social problem;

(3) discrimination against individuals with disabilities persists in such critical areas as employment, housing, public accommodations, education, transportation, communication, recreation, institutionalization, health services, voting, and access to public services;

(4) unlike individuals who have experienced discrimination on the basis of race, color, sex, national origin, religion, or age, individuals who have experienced discrimination on the basis of disability have often had no legal recourse to redress such discrimination;

(5) individuals with disabilities continually encounter various forms of discrimination, including outright intentional exclusion, the discriminatory effects of architectural, transportation, and communication barriers, overprotective rules and policies, failure to make modifications to existing facilities and practices, exclusionary qualification standards and criteria, segregation, and relegation to lesser services, programs, activities, benefits, jobs, or other opportunities;

(6) census data, national polls, and other studies have documented that people with disabilities, as a group, occupy an inferior status in our society, and

are severely disadvantaged socially, vocationally, economically, and educationally;

(7) the Nation's proper goals regarding individuals with disabilities are to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for such individuals; and

(8) the continuing existence of unfair and unnecessary discrimination and prejudice denies people with disabilities the opportunity to compete on an equal basis and to pursue those opportunities for which our free society is justifiably famous, and costs the United States billions of dollars in unnecessary expenses resulting from dependency and nonproductivity.

(b) Purpose It is the purpose of this chapter—

(1) to provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities;

(2) to provide clear, strong, consistent, enforceable standards addressing discrimination against individuals with disabilities;

(3) to ensure that the Federal Government plays a central role in enforcing the standards established in this chapter on behalf of individuals with disabilities; and

(4) to invoke the sweep of congressional authority, including the power to enforce the fourteenth amendment and to regulate commerce, in order to address the major areas of discrimination

faced day-to-day by people with disabilities. 42 U.S.C. 12101

Pursuant to Supreme Court Rule 14.1(f), the rest of the ADA is attached to as Excerpt, because of their length.

Tile 28. United States Code, Section 1331

Under 28 U.S.C. Section 1331, "the district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States."

Tile 28. United States Code, Section 1332

Under 28 U.S.C. 1332, (a) The district courts shall have original jurisdiction of all civil actions where the matter in controversy exceeds the sum or value of $75,000, exclusive of interest and costs, and is between—

(1) citizens of different States;

(2) citizens of a State and citizens or subjects of a foreign state, except that the district courts shall not have original jurisdiction under this subsection of an action between citizens of a State and citizens or subjects of a foreign state who are lawfully admitted for permanent residence in the United States and are domiciled in the same State;

(3) citizens of different States and in which citizens or subjects of a foreign state are additional parties; and

(4) a foreign state, defined in section 1603(a) of this title, as plaintiff and citizens of a State or of different States.

Statement of the Case

Case arises from two insurance claims filed by Courtney with her two homeowner's insurance policies both in force at the time of the covered losses filed by Courtney Kristek aka Courtney Dolan, Petitioner. (Hereinafter "Courtney"). Two insurance claims at issue were filed in 2017-18, and two homeowner's insurance policies are with Appellees, Travelers and Hartford Insurance. Respondent, 360 Insurance is Courtney's insurance agent who sells and services the Hartford insurance policy and the subject claim. Courtney's covered loss under the two above policies originate from the related Eighth Judicial District court ("House" case), A813743, two writs filed in that case, that appeal, and instant lower court case, and this appeal.

Underlying facts of the House case are undisputed. Most defendants were successful in that case, and filed claims against Courtney in the form of motions to dismiss, summary judgment, affirmative defenses, and motions for attorney's fees, forcing Courtney to defend herself, not prosecute her case. Courtney and Steven Mack, Esq. defend against all of these claims, and she has at least 5 judgments against her. No one *denies* that there are multiple attorneys defending against the claims, so attorney's fees argument is waived. Courtney files 2 claims, one with Travelers and Hartford to tender a defense and to promptly pay out on the covered

claims, which they never did. *No one denies that they did not investigate claims.*

Most of the House case defendants were granted *judgments* against Courtney that she and co-counsel defend against. At least 4 of those Defendants sought attorney's fees and costs. There are 8 judgments House case defendants obtained against Courtney. None of the insurance parties *deny the judgments. None of them deny the House case defendants sought fees, costs against Courtney. They cannot, because the House case record shows the orders, motions, and judgments.* Travelers and Hartford owe duties to defend her under insurance policies as to all of the above claims, but they never did. All three do not deny the specific adjusters actions in the Complaint. Courtney's policies with Travelers and Hartford have similar language, stating that Courtney has first and third party liability coverage against "claims" or "suits" against her. Courtney does not have to be a defendant in a suit for claims coverage. *Respondents do not deny that Hartford adjuster filed a claim under her business policy without her consent.*

The original Complaint in the state court was filed in March 2020. All of the claims in the Complaint are state causes of action, which was filed in the Eighth Judicial District Court. Please see Append D. Courtney, the insured, is covered under both policies for first and third party liability. Policies state that she is covered for the two claims and that Travelers and Hartford have a general duty to defend Courtney as to all claims against her. 360 Insurance told Courtney that she has a covered

claim under Hartford, and that Hartford owes her a duty to defend her in the House case claims, so Courtney is entitled to relief in the Complaint

All of the actions are state actions. 28 U.S.C. Sect. 1331. Courtney and 360 Insurance are in Nevada, so there is no *complete diversity*. 28 U.S.C Sec 1332. Petition for removal ("Petition") is untimely and procedurally improper, so removal fails. No one finds a federal question at issue. 360 Insurance is not a sham party, because it is Courtney's Hartford agent under the subject insurance policy. *There was never an evidentiary hearing finding that 360 Insurance is a sham party. Both orders of the lower courts are invalid, because there were never any hearings other than the motion for remand.*

A valid complaint was dismissed that is sufficiently pled in a court with no jurisdiction. 28 U.S.C. Sections 1441, 1447. After a jury demand, the case was never decided on the merits. U.S. Const., 14th Amendment by a jury, but by a court without jurisdiction. 28 U.S.C. Sections 1331, 1332. *All respondents fail to address due process arguments, so they are waived.* Ninth Circuit fails to address any due process arguments or any of the causes of action in the underlying case.

Travelers' removal to district court is untimely. Travelers was served on June 16, 2020, and the Petition was filed on July 16, 2020. Since removal was on the 31st day, statutorily late, there is no jurisdiction. 28 U.S.C. Section 1446. *None of the parties refute these dates.* Judge Dorsey dismisses

the case without prejudice when she has no jurisdiction. Three respondents file *untimely* motions to dismiss. The lower court ignores and misapplies laws, violating constitutional rights. Ninth Circuit affirms an invalid order by tricking her into consenting to jurisdiction by forcing her to file a motion for leave to amend, or she forfeits her case and appeal. Courtney was not able to be at the entire hearing through no fault of her own due to zoom. District court issues an order without a hearing where all the parties and counsel are present.

Lower court requires an in person hearing during Covid 10 when most don't. Courtney requests an accommodation under the ADA because of her disability. Judge Jennifer Dorsey refuses to accommodate her 5 times, forcing Courtney to file a motion. 42 U.S.C Sections 12101-12213. Federal district order attacks Courtney on the basis of her maiden and married name, which is discriminatory. *No one finds that the ADA does not apply and that Courtney is not entitled to requested accommodations.* New arguments are brought up for the first time in Ninth Circuit in the Respondents' answers and the order. See Append. 1a-9a.

Lower courts' orders discriminate against Courtney by gender by taking issue that she goes by her married and maiden name. The courts are more concerned about Courtney's name than the merits of the case. Ninth Circuit's order affirms an order that fails to address the specific causes of action. Lower courts are fixated on a person's gender based named instead of the merits of the case. A person is legally entitled to use any name they want. It is not up to

the lower courts determine whether a woman or man hyphenates their name, or uses their maiden or married name. That is unconstitutional and discriminatory.

Ninth Circuit affirms order with no analysis. FRCP 12 is not even mentioned in the orders, either. 9th order fails to address jurisdiction. Append 1a-6a. Ninth circuit order (Hereinafter "9th order") ignores the respondents. 9th order ignores the record. Without a hearing, Ninth Circuit finds that a party is not entitled to service of Petition documents for removal. Both orders conflict with one another, while 9th order claims it affirms the order. Both orders ignore all due process arguments, and *also do not address the causes of action in the Complaint.* Lower courts' orders ignore statutes, and this Honorable Court's own precedence. Append. 6a-37a.

District Court grants Courtney's request for a remote hearing based on her ADA request. Append. 38a. This order was granted after Courtney made at least 5 ADA requests to district court. Append.56a On October 7, 2020, federal court conducts a bench trial without all the parties being present, dismissing the Complaint without prejudice. Append. 6a-37a. However, this order was a final order, tolling Courtney's time to appeal. Append. 6a-37a. To preserve Courtney's right to appeal, she timely files her appeal with the 9th Circuit. Courtney requested a hearing for the appeal, and it was granted. A month later, the 9th Circuit denied her request for a hearing, and issued its order on October 21, 2021. Append. 56a On November 2,

2021, Courtney filed a petition for rehearing, which was summarily denied in a record 2 days. The order denying the petition for rehearing was filed on November 4, 2021. Append. 39a

REASONS FOR ALLOWANCE OF THE WRIT

Whether a party must disclose her disability to a place of public accommodation to receive an accommodation violates the ADA. Pursuant to the ADA, a federal court is a place of public accommodation. 42 U.S.C. Sections 12101-12213. Ninth Circuit finds that a person with a disability must place her disability on the record before a place of public accommodation grants an accommodation. This violates the ADA. Id. 9th Order conflicts with the district court order, because Courtney was not required to disclose her disability on the record. 9th Order is in conflict with itself and this Honorable Court, and with 28 C.F.R. Section 311. And does the Ninth Circuit Court's discriminatory ruling, which conflicts with other circuits, violate against public policy and civil rights for people with disabilities?

Is it a civil rights violation and against public policy for the lower courts to determine whether or not is improper for a party to use both their married name and their maiden in their professional and private lives. Lower courts' orders violate the equal protection clause, and is in direct conflict with Moritz v. IRS, 469 F. Supp. 466 (10th Cir. 1972), which found that the federal government could not discriminate against parties based on gender or sex.

Whether it violates public policy for the Ninth Circuit to affirm a district court's orders, when there is no jurisdiction? 28 U.S.C. Sections 1331, 1332. And is it also against public policy for the Ninth Circuit Court to affirm federal court's order that conflicts with this Honorable Court's multiple rulings as to the timeliness and procedure of federal court removal and that also ignores and conflicts with FRCP 12?

ARGUMENT

I. Review is warranted to resolve a conflict with the application of the ADA

A. Lower courts' orders conflict with a public place requiring a person to disclose their disability to receive accommodations

The ADA, enacted in 1990, codified federal law protecting persons with disabilities from being discriminated against by public places and employers. 42 U.S.C. 12101. et. seq. Pursuant to the ADA," no individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation by any person who owns, leases (or leases to), or operates a place of public accommodation." 42 U.S.C. Section 12182. A place of public accommodation is defined as "auditorium, convention center, lecture hall, or other public gathering," which includes courts. 42 U.S.C. 12181(7)(d). Courtney is the person with the

disability. Courtney presented herself as a person with a disability to both lower courts. *District court did not require Courtney to disclose her disability. Ninth Circuit did not require Courtney to provide proof of her disability when it granted her first request for a hearing before it later revoked the remote hearing.* Motion for Remote Hearing, Reply brief, and Petition for Rehearing. Append 38a, 56a. 9th order conflicts with its own actions and the federal courts ruling and actions, making it unenforceable; warranting the granting of the Writ. Append. 1a-38a, 56a.

"Title II of the ADA prohibits discrimination on the basis of disability in all of a public entity's "services, programs, and activities." Id. § 12132; 28 C.F.R. § 35.130(a). Section 504 similarly prohibits such discrimination by entities that receive federal financial assistance. 29 U.S.C. § 794." Alboniga ex rel. A.M. v. Sch. Bd. of Broward Cnty. Fla., 87 F.Supp.3d 1319 (S.D. Fla. 2015). As two places of public accommodation under the ADA, Courtney asked for an accommodation to have a remote hearing because of her disability during Covid 19, and she was denied multiple times. District court partially granted the accommodation after Courtney was forced to file a motion. 9th Circuit order is unenforceable, because it conflicts with its own actions of granting the accommodation and then revoking it. Therefore, 9th Order is conflicting, because it contradicts the record and its prior actions, so hearing Writ is appropriate. Append. 38a., 56a.

Title II coverage is not limited to "executive agencies," but includes activities of the judicial branches of state and local governments. 28 CFR Sec. 35.102. *This Court, the ADA, and the first and second Circuit* are in direct conflict with 9th Order stating that it is improper for a place of public accommodation to ask a person's disability. Id. In Grill v. Costco, the ADA provides that discrimination is a failure to make a reasonable modification in policies when such a modification is necessary to afford the facilities to an individual with a disability. As the Department of Justice interpretations indicate, it is not necessary for Costco to modify their written policy to remove their "task or function" question."_312 F.Supp.2d 1349_(W.D. Wash. 2004). "[A] plaintiff can assert a failure to accommodate as an independent basis for liability under the ADA and [Section 504]."); McGary v. City of Portland, 386 F.3d 1259, 1266 (9th Cir.2004) (failure to make reasonable accommodates sufficient to state ADA claim); Henrietta D. v. Bloomberg, 331 F.3d 261, 276–77 (2d Cir.2003) ("[A] claim of discrimination based on a failure reasonably to accommodate is distinct from a claim of discrimination based on disparate impact."). Bailey v. Georgia–Pacific Corp., 306 F.3d 1162, 1166 (1st Cir.2002). Sheely v. MRI Radiology Network, P.A.,505 F.3d 1173, 1185 n. 11 (11th Cir.2007)(explaining "the ADA prohibits public accommodations from requiring proof that an animal is a service animal"). The regulation thus protects individuals with disabilities from possibly unwanted questioning." Cordoves v. Miami-Dade, 104 F.Supp.3d 1350 (S.D. Fla. 2015).

Even the District Court and Ninth Circuit did not ask Courtney her disability in the five times she asked for an accommodation, knowing that it was discriminatory to ask. Append. 38a, 56a. However, Ninth Circuit, *creates a new ruling and argument on appeal for the first time*, ruling that her disability must be on the record, which is improper. Append 1a-6a. Moreover, Ninth Circuit granted her request for a hearing and accommodation without a hearing and without a disclosure of her specific disability on the record before then taking away the remote hearing and accommodation as retaliation. So, that finding is erroneous, and conflicts with the ADA and the above circuit court rulings.

9th Order conflicts with two 5th Circuit rulings that state "we have stated, in the context of access to public education, that Title II of the ADA "mandat[es] physical accessibility and the removal and amelioration of architectural barriers." Pace v. Bogalusa City School Bd., 403 F.3d 272, 291 (5th Cir.2005)." Frame v. City of Arlington, 616 F.3d 476 (5th Cir. 2010). As stated above there is no dispute as to the courts being a public entity, and that Courtney has a qualifying disability. 9th Order also conflicts with the 7th Circuit, which finds " "'[F]ailure to accommodate is an independent basis for liability under the ADA.' Wisconsin Cmty. Servs., Inc. v. City of Milwaukee, 465 F.3d 737, 751 (7th Cir. 2006). District court and Ninth Circuit did not require proof of Courtney's disability when they both granted her request for a remote hearing. None of the parties opposed her request for an ADA accommodation remote hearing. To apply a different legal standard by requiring her to prove her disability one year into

the Ninth Circuit appeal is prejudicial, unconstitutional, and embarrassing. Ninth Circuit denying Courtney' request for a remote hearing after originally granting it 6 months ago violates public policy and discriminates against those with disabilities, making it harder for them to have access to the public courts.

"[T]he Supreme Court has instructed that a disabled prisoner can state a Title II-ADA claim if he is denied participation in an activity provided in state prison by reason of his disability." Bircoll v. Miami-Dade County, 480 F.3d 1072, 1081 (11th Cir. 2007) (citing Pa. Dep't of Corr. v. Yeskey, 524 U.S. 206, 211 (1998)). Lower courts violate Courtney's constitutional rights by treating her differently than other people who were granted remote hearings during the pandemic without a disability, violating public policy, and the equal protection clause of the US Constitution. Parties were to *originally* have a remote hearing in district court. There are no cases in the lower courts' orders supporting their violation of the ADA. The 9th Order's disability cases cited are irrelevant, and is waived, because no one ever opposed Courtney's request for remote hearing until appeal, so all arguments are waived as to disability arguments. "A point not urged in the trial court, unless it goes to the jurisdiction of that court, is deemed to have been waived and will not be considered on appeal." Britz v. Consolidated Casinos Corp., 87 Nev. 441, 447, 488 P.2d 911 (1971); Harper v. Lichtenberger, 59 Nev. 495, 92 P.2d 719 (1939). It was incumbent upon the appellant to direct the trial court's attention to its asserted omission to mention the counterclaim expressly in its judgment. For

example, the appellant could have moved the district *984 court for amended judgment which would have included an explicit ruling on its counterclaim. NRCP 52(b). Because the appellant neglected to raise the issue that a decision on its counterclaim needed to be made, and because this issue does not concern the jurisdiction of the trial court we will not consider that issue on appeal. Britz, cited above." Old Aztec Mine v. Brown, 623 P. 2d 981, 983 (Nev. 1981).

Hearing the Writ is necessary, because Courtney should not have to risk her life to attend a hearing during Covid 19 as she is immunocompromised. There was never a Ninth Circuit Court hearing for the appeal, even though it was originally granted. Append. 56a. There was never a full blown hearing with all the parties present in the District Court, and the lower court conducted a bench trial without Plaintiff being present in a court with no jurisdiction. 42 U.S.C. Sections 1331 and 1332. Hearing the Writ is proper, because the lower court orders are invalid and violate public policy as being discriminatory against people with disabilities and gender.

B. It Is Against Public Policy to Deny A Hearing to Disabled Petitioner

It is against public conscious and policy to deny access to our courts to people with disabilities. Wernick v. Federal Reserve Bank, 91 F.3d 379, 384 (2d Cir. 1996) (noting 'Congress intended simply that disabled persons have the same opportunities available to them as are available to non-disabled

persons'..." Secs. 34 Creighton L. Rev. 611 Hand-up or Handout? The Americans With Disabilities Act and Unreasonable Accommodation of Learning Disabled Bar Applicants: Toward a New Paradigm (Nebraska Creighton Law Review). Ninth Circuit's Order violates public policy, because it discriminates against a person's gender and their a disability. As to Courtney's disability, the Order does not deny that the ADA applies, but it violates it. It does not dispute that she has disability. Also, it does not dispute the fact that she requested an ADA accommodation, or that she is entitled to an ADA accommodation. Append. 1a-5a. A year into the appeal and after initially granting a remote hearing, Ninth Circuit reverses itself and denies her request for a remote hearing. Append 1a-5a, 56a. *District court did not request disclosure of Courtney's disability.* So it is waived on appeal. It is also against public policy for a court to ignore its own order, meaning Ninth Circuit granted initial request for remote hearing without her disability ever being disclosed but then requires it to be disclosed in its final order. Append 1a-5a, 56a. Petition for Rehearing should have been granted on this issue alone. *Ninth Circuit's orders are against public policy, because it is failing to follow its own orders of granting a remote hearing. Append. 1a-5a, and 39a.*

> *Violating the ADA is against public policy.* "A public accommodation shall not ask an individual using a wheelchair or other power-driven mobility device questions about the nature and extent of the individual's disability." 28 CFR 36.311 Mobility devices (Code of Federal Regulations (2021 Edition)).

9th Orders violate public policy, because it invades Courtney's privacy as a person with a disability. Id. Both lower courts embarrass and harass a person with a disability. The purpose of the ADA is to avoid this. Life is hard enough for someone to navigate the legal system without a disability. People are entitled to traverse legal proceedings without facing difficulty and discrimination. 9th Order is discriminatory stare decisis, because it invades Courtney's privacy by requiring her to disclose her disability in public. The Orders fail to address the merits of the case. The majority of the Orders are focused on her gender based name and her disability. The business of courts is to dispense justice, not to discriminate. Lower courts are discriminating against Courtney, who has a disability, by making her disability and gender based name the main focus of their orders to harass and embarrass her. Append. 1a-5a, 39a. These orders shock the conscience of society, and warrant hearing the Writ.

Hearing the Writ is proper, because people with disabilities are underrepresented in our society and especially in legal proceedings. If this Honorable Court ignores these discriminatory orders, then it will be affirming and rewarding discriminatory behavior by the Ninth Circuit and the District Court, allowing such egregious behavior to continue. According to the Center for Disease Control, there are 61 million Americans with a disability. Centers for Disease Control and Prevention. Disability and Health Data System (DHDS) [Internet]. [updated 2018 May 24; cited 2018 August 27]. Courtney is a person with a disability. She is entitled to have her

case heard on the merits like any other American with a disability. She is a large majority. In a civilized nation of law and order, courts are charged with the privilege to protect and preserve civil rights and human rights. Protection of persons with disabilities is human rights. Human rights are civil rights, and are meant to be preserved and protected by the courts and the U.S. Constitution.

Writ must also be heard, because the facts of this case are unique and important to this Honorable Court, because the case involves gender and disability discrimination concurrently. It is important public policy that this is heard, because the facts were ignored by both lower courts. The only facts in the orders are about Courtney's name and her disability. Writ must be heard, because her disability and her married and maiden are being used against her. The focus should be on the two insurance contracts and the insurance agent, who both courts just completely ignore in the orders. The two orders are personal attacks on Courtney, not addressing the merits of the case. The matter must be heard de novo, because orders do not address any of the causes of action. The language and diction of the 9th Order is shockingly similar to Judge Jennifer Dorsey's order. Append 1a-5a, 6a-37a. It must also be heard, because the orders do not address five unopposed, valid constitutional arguments made in the lower court. Lower courts issue an order without hearings. District court issues orders dismissing an entire complaint without full service of all documents to plaintiff, or hearings.

C. Ninth Circuit's Order conflicts with the Constitution, this Honorable Court, and other circuits because it penalizes people for using gender based names.

Ninth Circuit's Order directly conflicts with the US Constitution, 10th Circuit and this Honorable Court's rulings. Moritz v. IRS, 469 F. Supp. 466 (10th Cir.1972). This Order is unconstitutional, because a person has the right to identify themselves by any name they want, e.g. if a woman wants to use her maiden name professionally and her married name privately, such as Courtney, does, then she has constitutional right to do so. The same goes for any gender, or ethnicity. Any gender can choose to marry, not marry, separate be adopted, and change their name at any time without having to answer for it. Lower courts' first, main issue aside from Courtney's disability is her name. This was mentioned first by Respondents' counsel, William Reeves, Chad Butterfield, and Scott Rasmussen. Esqs. to intimidate and embarrass Courtney. It is discriminatory for the lower courts to allow Respondents to do this. All parties, including the lower courts, were aware that she used both names when she completed the insurance contract, because they require a copy of her driver's license for the insurance application. People have a constitutional right to use any name they want. A person has the right to sign and enter into contracts with any name they want, including suing a party. This case is an insurance bad faith, so Courtney's name is irrelevant.

Writ must be heard, because the 9th Order conflicts with itself, because it takes issue with Courtney's Complaint, but she never given a full blown hearing. It erroneously states that she could request a hearing. District Court order is a final order and tolls Courtney's time to file an appeal. Append. 6a-37a. However, then 9th Order states that she could have motioned the District Court for a hearing. If Courtney filed a motion in the lower court for a hearing or a motion to amend, the time to file an appeal is exhausted. A party has a constitutional right to an appeal.

The 9th Order also conflicts with itself, because it states that Courtney did not disclose her full name, when she never had the opportunity to amend the Complaint, because the lower courts never had jurisdiction. 42 U.S.C. Sections 1331,1332. Also, Courtney should not have to disclose her legal name in a complaint, because it is irrelevant. None of the other respondents or the attorneys were questioned or censured for using different names in the proceedings.

Writ should also be heard, because the lower courts' orders are unconstitutional by ordering Courtney how to sign her motions and pleadings as a party and as an attorney. This is the first time in over 15 years of practice that she has been told as an officer of the Court on how to sign her pleadings. Second, it interferes in Courtney's practicing law which violates her due process rights. Third, the State Bar of Nevada allows attorneys, Courtney included, to practice law under their maiden name, and use their either hyphenated or married name

interchangeably. Courtney fully disclosed and explained her name on motions and at the brief hearing she attended in lower court. Ninth Circuit Court and District were aware of full names, and allowed close to a dozen filings by Courtney and her law firm without issue using both names. Courtney's name is irrelevant, and to bring it up is discriminatory based on gender. Moritz, 469 F. Supp. 466 (10th Cir. 1972). Both the disability and gender discrimination issues were never addressed by Respondents in lower court, but 9th Circuit ignores waived arguments, and makes them the center focus of their Order, which violates U.S.Constit, 14th Amend, for the first time on appeal.

District court ordering, Courtney as long standing member of the State Bar of Nevada on how to sign her pleadings, is discriminatory. Courtney, as a protected class, a female, is allowed to sign her name however she wants. It is Courtney's fundamental right to sign her name as she wants. It is illegal to discriminate on the basis of sex which is a violation of the equal protection clause. Moritz, 469 F. Supp. 466 (10th Cir. 1972). Lower courts are *fixated on Courtney's name instead of the merits of the case.* This invades Courtney's privacy and constitutional rights. *No one refutes specific facts or the laws cited in Courtney's motions, Complaint, or briefs.* Hearing the Writ, because the lower courts are biased against Courtney by discriminating against her. It is unconstitutional for the lower court to be telling Courtney how to sign her name. Id. Moritz states, "an invidious discrimination and invalid under due process principles. It is not one having a fair and substantial relation to the object of

the legislation dealing with the amelioration of burdens on the taxpayer, citing Reed v. Reed. In Reed, in a *unanimous decision,* this Honorable Court ruled: 404 U.S. 71 (1971).

"To give a mandatory preference to members of either sex over members of the other, merely to accomplish the elimination of hearings on the merits, is to make the very kind of arbitrary legislative choice forbidden by the Equal Protection Clause of the Fourteenth Amendment; and whatever may be said as to the positive values of avoiding intra family controversy, the choice in this context may not lawfully be mandated solely on the basis of sex." (Emphasis added).

Writ must be heard, because, *ironically,* authors of the three orders of two lower courts try to embarrass and shame a female for using both her maiden and married name. It is discriminatory to shame Courtney for using both names. Ninth Circuit did not review this appeal de novo, because it uses Judge Jennifer *Dorsey's own words and 3/4ths* of its order. For instance, three of the orders place front and center Courtney's name in orders that are supposed to be authored from 4 different judges in two separate courts. Odd, maybe. Probably not.

Both lower courts never asked the three male attorneys why they use different names. Agent, Respondent, 360 Insurance has a doing business name that it does not fully use publically, but none of the lower courts cared. Defense counsel only uses his middle name with only a first initial, R. Scott Rasmussen, Esq., tons of other attorneys and

professionals do that, but the Ninth Circuit and Judge Jennifer Dorsey have to find a reason to go after Courtney about her name and her disability. These courts do not want to address the case on the merits, because Courtney would likely win. Moreover, 9th Circuit and district court did not change the caption, and accepted dozens of filings with both the Kristek and the Dolan names, so it is waived. 9th order conflicts with itself, because it allows the pleadings and motions filed by Courtney, but then condemns her signature only in the orders. It is discriminatory and violates the equal protection clause for the lower courts to treat Courtney differently than the other parties.

Writ must be heard, because the 9th Order conflicts with Moritz and rulings from this Honorable Court, and it violates the equal protection clause to discriminate against someone based on gender. Id. 9th order also conflicts with the 5th circuit. In U.S. v. Virginia, 518 U.S. 515, 533 (1996) (holding that an institution's refusal to admit women is intentional gender discrimination in violation of the Equal Protection Clause because, inter alia, of 'overbroad generalizations about the different talents, capacities, or preferences of males and females')..." Pederson v. Louisiana State, 213 F.3d 858 (5th Cir. 2000). "We conclude that, because classifications based on 'archaic' assumptions are facially discriminatory, actions resulting from an application of these attitudes constitutes intentional discrimination." The above cases apply to this case, because the 9th Order discriminates against Courtney on her marital status and gender with the archaic, categorical stance that a woman is only to

use either her married name or maiden name, not both. Id. These two cases apply, because they are gender discrimination cases. Courtney informed Judge Jennifer Dorsey that she wanted to go by Courtney Dolan, but she decided what name Courtney should go by, which is not up for her to decide.

Writ must also be heard, because the 9th Order is in conflict with 5th Circuit and others, because lower courts are discriminating against women. Id. Both lower court orders fail to address any of the contract or biographical facts of the case. Both orders fail to identify the parties in the case. Both orders only address the disability, and gender facts that are not a part of the record. Both orders cite no law that allow courts to discriminate against gender, because there is no legal precedence until now, which is why hearing Writ is warranted. This case also conflicts with the above rulings and "42 U.S.C. § 2000a. "A number of courts have relied on Price Waterhouse to expressly recognize a Title VII cause of action for discrimination based on an employee's failure to conform to stereotypical gender norms." Etsitty v. Utah Transit Auth., 502 F.3d 1215, 1223 (10th Cir.2007). 21..." Morrison v. Brumby, 724 F.Supp.2d 1284 (N.D. Ga. 2010). "The Supreme Court has recognized that individuals have a right, protected by the Equal Protection Clause, to be free from discrimination on the basis of sex in public employment. Davis v. Passman, 442 U.S. 228, 234-35, 99 S.Ct. 2264, 60 L.Ed.2d 846 (1979)." Morrison v. Brumby, 724 F.Supp.2d 1284 (N.D. Ga. 2010). Sex stereotyping is discrimination, ""Plaintiff's claim is based upon sex stereotyping, as recognized by this

Court, Price Waterhouse v. Hopkins,490 U.S. 228, 109 S.Ct. 1775, 104 L.Ed.2d 268 (1989)." Morrison v. Brumby, 724 F.Supp.2d 1284 (N.D. Ga. 2010). ""Sex stereotyping based upon a person's gender non-conforming behavior is impermissible discrimination, irrespective of the cause of that behavior ..."); Kastl v. Maricopa Co. Cmty. Coll. Dist., 325 Fed.Appx. 492, 493 (9th Cir.2009)..." Morrison v. Brumby, 724 F.Supp.2d 1284 (N.D. Ga. 2010)

Lower courts' orders conflict with Honorable Court's and the 10th Cir., because they are gender norming woman into only either going by their married name or maiden name, not both, which a woman is allowed to choose on her own. Courtney can use either her married, maiden, or hyphenated name in a legal proceeding. If a reasonable court can draw the necessary inference from the factual material stated in the complaint, the plausibility standard has been satisfied." Keys v. Humana, Inc., 684 F.3d 605 (6th Cir.2012). Here, it is on the record of the lower court's discriminatory intent in taking issue with Courtney's name. It does worse than that. Judge Jennifer Dorsey determines what name Courtney must go by. Courtney can go by whatever name she wants as a plaintiff in law suit. So, the caption needing to be accurate is not an accurate excuse to discriminate against women. No one provides a legal basis for the lower courts' discriminatory actions toward Courtney about her name. Using a married name versus a maiden is a gender norm of females, which a federal court in Ohio found that an employer discriminated against a male employee for using his husband's last name,

"accordingly, there are sufficient facts to support Koren's contention that Ohio Bell's proffered legitimate, nondiscriminatory reason for firing him was a pretext for discriminating against him for failure to conform to gender norms..." Koren v. Ohio Bell Tel. Co., 894 F.Supp 2d 1032, 1039 (N.D. Ohio 2012).

"All persons shall be entitled to the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of any place of public accommodation, as defined in this section, without discrimination or segregation on the ground of race, color, religion, or national origin." 42 U.S.C. 2000a

D. Discriminating against people using gender based name is against public policy.

Discrimination alone is against public policy. It is also against public policy for a court to promote and be discriminatory as both lower courts are. Id. It is against public policy for the lower courts to make an example of Courtney based on her gender based, married name. It is against public policy to punish someone who is married, who has done business with the Respondents using both names. It is also against public policy to set legal precedence of discrimination, but it will undo long standing legal precedence for women's rights. It is also public policy to police people's use of their names, because it will hinder others from using maiden names professionally. It is also against public policy for a court of law to bizarrely and without legal authority

to discriminate against a party based on gender. *Gender is a topic of public concern, "the D.C. Circuit has found statements about "discrimination on the part of a public agency [to be on a] matter of public concern." Tao v. Freeh, 27 F.3d 635, 640 (D.C.Cir.1994)..." Allen-Brown v. Dist. of Columbia, 54 F.Supp.3d 35 (D. D.C. 2014).*

Writ must be heard, because the discriminatory orders must be reversed. 9th order does not invalidate or disprove any of the cases cited by Petitioner. *It is not up to a court to determine what name a woman should go by, which lower courts are doing.* The orders also violate Courtney's privacy rights be determining and calling her out for using both her legal names. The orders are also violate public policy, because it ignores all law and order that have been in place for decades, such as the FRCP. If the orders stand, it opens the floodgates to bad, discriminatory precedence. For instance, the private sector would be allowed to discriminate against minorities and other genders, because courts can determine American citizens' names. Federal government identifications and documents with hyphenated and contain both married and maiden names are up for scrutiny. There will be more litigation. Also, if this Honorable Court does not hear this Writ then courts will disparately treat minorities when courts in this country are charged in protecting them against *gender and ethincity discrimination.* Legitimizing discrimination is against public policy, and it would be illegal for this Honorable Court to do so. Id.

Writ must be heard, because name discrimination is also against public policy. Name discrimination is based on someone's marital status for which someone cannot be discriminated against. Id. It is also ethnicity discrimination. Courts have no right to promote or punish a woman for being married, or retaining both her maiden and married name. Id. This case is a matter of precedence to this Honorable Court, and it must be heard, because the lower courts never heard the case on the merits. There never was a hearing. A person's name has nothing to do with the proceedings. Courtney was called a "fraud" for using both her maiden name professionally and her married name privately. It is against public policy for a court to determine someone's name, and to punish them for being married. People have the freedom to use whatever name they want. If a party wanted to sign their name as x to a contract that is their choice. That is the other troubling thing, lower courts are telling Courtney how to sign her pleadings and her motions when she is an officer of the court. That is interfering in her right to practice law, and it is the name she has registered with the State Bar of Nevada since 2005. So, it is against public policy for courts to name determine and to name discriminate against women. Parties have freedom and a right to privacy to select whatever name they want to go by, so in order to preserve people's right to use their names, this Honorable Court must reverse these two ridiculous, discriminatory orders.

E. Writ must be heard, because the lower courts ignore seminal law and address no facts other than disability and name facts on an untimely removal

28 U.S.C. Section 1446(b), states:

> "The notice of removal of a civil action or proceeding shall be filed within thirty days after the receipt by the defendant, through service or otherwise of a copy of the initial pleading, setting forth the claim for relief upon which such action or proceeding is based..."

Statute requires that petition for removal *must* be made within 30 days after service. Id. Lower court abuses discretion by allowing Travelers to file and grant untimely removal. No one denies 28 U.S.C. 1446(b) applies, or Petition was filed on the 31st day. Travelers wrongly argues that it is entitled to an extra day under FRCP 6. This contravenes the mandatory language of 28 U.S.C. 1446(b), which trumps any unpersuasive, case law. Travelers files Petition on July 16, 2020. Travelers is served on June 16, 2020. Petition is filed on the 31st day, violating 28 U,S.C 1446(b). Lower court abuses its discretion by ignoring laws, so case must reversed and remand the case. Id. An abuse of discretion is a plain error, discretion exercised to an end not justified by the evidence, a judgment that is clearly against the logic and effect of the facts as are found." Rabkin v. Ore. Health, 350 F.3d 967, 977 (9th Cir. 2003). In Murry Bros. v. Michetti, *a court confirms that 30 day tolling for removal begins the same day*

as service of complaint and summons. U.S. Supreme Court reverses and remands a late petition, beyond 30 days. Murry Bros, *526 U.S. 344 (1999).* Writ must be heard, because a late petition is *fatal.* Lower court ignores and conflicts with this Honorable Court's ruling, and ignores all federal removal statutes, so hearing Writ is in the interest of judicial economy, because many cases will be overturned because of lower courts' orders. Id.

A defendant generally cannot cure a defective notice of removal by asserting a new basis of jurisdiction not in the original notice of removal, which lower court allows appellees to do sua sponte without motion to amend petition filed by Travelers. Zamora v. Wells Fargo, *831 F. Supp. 2d 1284, 1293-94, 1303 (D.N.M. 2011)..." Travelers is not allowed to amend the Petition. 28 U.S.C. 1446(b).* Here, Travelers never filed a motion to amend its petition, which is required. Id. Insurance parties never filed a motion for leave to amend petition. *Amendment is also not allowed, because the original petition is untimely. 28 U.S.C. 1446(b), so all cases cited by appellees are inapplicable.* Amendment statute not mentioned until the appeal, so this argument is waived. Order is invalid, because it blocks Courtney to object to new Petition without forfeiting right to appeal, or filing other motions. *Id.* A party has due process rights to participate in proceedings, and also recognizes a due process right to respond to claims of an adverse party. Goldberg v. Kelly, 397 U.S. 291 (1970). Courtney never had the opportunity to respond to the amended Petition, so orders are invalid. Id. It is an abuse of discretion to ignore statutes. 28 U.S.C. 1446(b); Id; Reed v. Lieurance,

863 F.3d 1196, 1208 (9th Cir.2017). Removal statutes are "construed narrowly and doubts regarding the propriety of removal are resolved against such action." Pritchett v. Office Depot, 420 F.3d 1090, 1094-95 (10th Cir. 2005). Removal statutes are to be "strictly constue[d] . . . against removal jurisdiction."Gaus v. Miles, 980 F.2d 564, 566 (9th Cir. 1992). There is no jurisdiction, because all actions are state actions. Removal statutes mandates are jurisdictional, "..a court must strictly construe the requirements of the removal statute, as removal constitutes an infringement on state sovereignty." Beard v Lehman, 458 F.Supp. 2d 1314, 1317 (M.D. Ala. 2006), 28 U.S.C. Sec. 1446(a). There was no evidentiary hearing. *Conducting a bench trial without discovery when a party and counsel is not present violates due process rights. U.S. Constitution14th Amendment.* Both orders also violate FRCP 12, and a longtime case law by not finding that all the allegations in the Complaint are true by dismissing a valid law suit without prejudice.

360 files an answer, so it admits on the record it is not a sham party. But both courts ignore two records and pleadings by ignoring the Answer. Also, district court did not dismiss 360 Insurance out of the law suit, so it never found that it is a sham party. District Court's own order affirms that it does not have jurisdiction, because it kept a non-diverse party, non-sham party in the case, 360 Insurance. Importantly, district court order never found that 360 Insurance was a sham party. No one ever properly motioned the court for a sham party hearing. So, Ninth Circuit is making first time rulings on appeal,

that 360 Insurance is a sham party. This also violates Courtney's due process rights. U.S. Const. 14th Amend.

360's mod is invalid, because it files a motion to dismiss after filing an answer, which violates FRCP12. It must be treated as an msj, but both lower courts cite FRCP 12, but ignore it by applying the *wrong* legal standard. Hartford files a motion to dismiss 43 days, and 360 Insurance files a mod 62 days after service. Motions to dismiss are all late, because they are 21 days after service. Id.

This is an insurance bad faith case. Lower court orders do not even identify parties, or the causes of action. 9th order lies that all issues are addressed by district court. An insurer, who fails to properly reserve a defense or properly identify a conflict, may be found to be estopped from asserting them. State Farm v. Martinez, 384 Ill. App. 3d 494, 498, 893 N.E.2d 975, 979 (1st Dist. 2008). Hartford's documented, authorized agent, 360 Insurance told Courtney on a few occasions that her claim is covered, and that Hartford had a general duty to defend her in related cases. This ***"[D]efense" is about avoiding liability ... [and] a duty to defend would be nothing but a form of words if it did not encompass all litigation by the insured which could defeat its liability."*** Great West, (N.D. Ill. 2003). Hartford never preserved any reservation rights to claim, and Travelers only preserved the defense that it does not pay for law suits. District court granted 3 invalid mods with defenses that were not preserved by insurance parties. Id.

"A claim of insurance bad faith arises where an insurer refuses without good cause to defend or indemnify where the policy provides for coverage." Frog Switch v. Travelers,193 F.3d 742 750-751 (3rd Cir 1999). Bad faith claim supported by allegations showing an unfounded or frivolous refusal to pay a claim, or failure of a duty to investigate the facts, or failure to communicate with the insured concerning the claim, including but not limited to reckless disregard of the lack of the basis for the denial of coverage may. NVR v. Motor Mut. 2:16-cv-00722, 2016 U.S. Dist. Lexis 163351 (W.D. PA Nov. 18, 2016). Insurance parties' failure to investigate claims is sufficient alone for bad faith cause of action. "Well settled that an insurer undertaking the defense of an insured against a litigious assertion of an unprotected liability, without a disclaimer of contractual responsibility and a suitable reservation of its rights, is foreclosed from thereafter taking refuge in the policy provisions exempting the liability from coverage." Nat'l UnionFire 384 F.2d at 318; Diamond Serv. v. Utica Mut 476 A.2d 648, 655 (D.C.1984) Cincinnati Ins. v. All Plumb, 983 F.Supp.2d 162, 167 (D.C. 2013). *There is no exclusionary language in the policies denying coverage of the two claims.* Writ must be heard, because it lower courts' orders never address insurance law, and it conflicts with its own circuit, and the 1st and 3rd circuits, along with many other federal district court rulings. Orders do not even address the subject insurance policies, showing the case was not heard on the merits by both lower courts.

CONCLUSION

Removal was *untimely without proper service.* Writ must heard, because there was no jurisdiction, so the Ninth Circuit is in conflict with all removal, remand FRCP statutes, itself, and all other circuit courts. 9th's Order conflicts with this Court and multiple circuits on important public issues of disability and gender discrimination. Orders fail to identify the parties or any of the causes of action. There never was a h*earing* to decide the merits of the case, even after 9th Circuit stated that it would have a hearing, and accommodate Courtney and then *reversed* itself. Writ must also be heard, because all applicable laws of the case are ignored, including FRCP 12.

Ninth Circuit affirms lower court judgments and then goes against it by making rulings for the first time on appeal, that 360 Insurance is a sham party, and that Courtney has to put her disability on the record. 9th Order does not address any of the facts of the case, except for discriminating against Courtney's name and her disability, violating the ADA. Writ must be heard, because the 9th Order is an attack piece instead of addressing the case on the merits. You cannot tell from both orders it is an insurance case.

Writ must also be heard, because the orders are discriminatory. Both lower courts determine what a married woman's name is. They also violate the ADA. Ninth Circuit affirms a judgment, but then applies a different legal standard. Courtney is not required to do disclose her disability under the ADA.

It did not require her to disclose her disability when it granted her an appellate hearing and ADA accommodation, and then took it away. Writ must be heard, because the district court has no jurisdiction, and it is taking away and usurping state's rights by removing cases that only the state courts have jurisdiction over.

Respectfully submitted,

COURTNEY DOLAN KRISTEK
PETITIONER
Appearing pro se for this writ
c/o DOLAN LAW GROUP, LTD.
5940 South Rainbow Boulevard
Las Vegas, NV 89118
Telephone: (702) 396-0910
Email:courtney@dolanlawlasvegas.com
COURTNEY KRISTEK aka COURTNEY DOLAN
Lower courts Attorney, not licensed with US
Supreme Court