

**DECLARATION OF JONAH GAVISH IN SUPPORT OF
MOTION TO SET ASIDE DEFAULT**

I, Jonah Gavish, after being sworn, declares as follows:

1. I am an attorney licensed to practice law in the State of Nevada and am an associate at the law firm of McDonald Carano LLP. I am over the age of 18 years and a resident of Clark County, Nevada. I make this declaration based on personal knowledge, except as stated to be based on information and belief, and as to that information, I believe it to be true. If called upon to testify as to the contents of this declaration, I am legally competent to do so in a court of law.

2. I am counsel for Defendant Cellular Sales of Knoxville, Inc. ("CSOKI").

3. I make this declaration in support of the Motion to Set Aside Default ("Motion") and, under EDCR 2.26, in support of CSOKI's request for an order shortening time for hearing on the Motion.

4. Based on my representation of and communications with CSOKI, and on information and belief, CSOKI is a Tennessee corporation. It is not incorporated in Nevada, does not maintain its principal place of business in Nevada, and has no offices, employees, property, agents, bank accounts, or operations in Nevada. CSOKI does not transact business in Nevada and has no contacts of any kind with this State.

5. CSOKI was never served. As reflected in the Declaration of Service Plaintiff filed on July 7, 2026 (attached as **Exhibit E**), Plaintiff purported to serve CSOKI by delivering the summons and complaint to CT Corporation System in Carson City, Nevada, as the registered agent of a Nevada entity. CT Corporation System is not CSOKI's registered agent; CSOKI, a Tennessee corporation, has no registered agent in Nevada. Plaintiff served the Nevada registered agent of a different entity, not CSOKI.

6. My firm was retained to represent CSOKI on the morning of July 28, 2026, the same day on which any response would have been due had service been proper. CSOKI's retained counsel from Texas, C. Larry Carbo, III, promptly requested an extension of time to respond from Plaintiff.

7. Plaintiff agreed to a two-week extension of CSOKI's time to respond. Mr. Carbo confirmed Plaintiff's agreement to the two-week extension by email, a true and correct copy of which is attached as **Exhibit A**.

1 8. Also on July 28, I sent Plaintiff an email attaching a proposed stipulation and order
2 memorializing the two-week extension, a true and correct copy of which is attached as **Exhibit B**.
3 Plaintiff did not respond to that email.

4 9. Notwithstanding Plaintiff's agreement to the extension, Plaintiff requested entry of
5 default against CSOKI on July 28, 2026 at 4:46 p.m., the very day any response would have originally
6 been due, and the Clerk entered default on July 29, 2026. A true and correct copy of the Default is
7 attached as **Exhibit D**. Plaintiff gave CSOKI no notice of her intent to take default and did not inquire
8 into CSOKI's intent to defend before requesting it, even though she knew CSOKI had retained counsel
9 and was actively communicating with her about its response.

10 10. Separately, Plaintiff responded with a series of hostile and abusive messages. A true and
11 correct copy of that email exchange is attached as **Exhibit C**.

12 11. Plaintiff's messages included an email she sent on July 28, 2026 at 5:30 p.m. stating:
13 "Don't you ever disrespect me you little boy: www.jonahgavish.com**Error! Hyperlink reference**
14 **not valid..**" The link directs to a website Plaintiff created that publishes false information about me and
15 appears intended to disparage my professional reputation. See **Exhibit C**. It is my understanding that
16 Plaintiff has created these websites on numerous occasions, against other attorneys and judges, and has
17 sworn to that fact in her *Motion for Voluntary Recusal of District Judge Joanna S. Kishner*. See Pl's
18 Motion for Vol. Rec. of Dis. Judge. Joanna S. Kishner at p. 3-4.

19 12. CSOKI seeks relief on an order shortening time because a default is now on file against
20 a defendant that was never served and over which this Court lacks personal jurisdiction, and CSOKI
21 wishes to promptly present its defenses without laboring under an improper default. No party will be
22 prejudiced by an expedited hearing and this case is in its infancy.

23 13. I understand that a Motion for Temporary Restraining Order is set for **August 11, 2026,**
24 **at 9:00 a.m.** If this Court is inclined to set the hearing on this Motion on that same date and time, I am
25 available to appear and argue this Motion.

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I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Jonah Gavish