

2019

**Melanie A. Madsen Thatcher, Plaintiff/Appellee/Cross-Appellant,
v. Michael Lang, Defendant/Appellant/Cross-Appellee : Brief of
Appellee**

Utah Court of Appeals

Follow this and additional works at: https://digitalcommons.law.byu.edu/byu_ca3



Part of the [Law Commons](#)

Original Brief Submitted to the Utah Court of Appeals; hosted by the Howard W. Hunter Law Library, J. Reuben Clark Law School, Brigham Young University, Provo, Utah.

Bryan J. Pattison, Durham Jones & Pinegar P.C.; attorneys for appellant.

Karra J. Porter, Kristen C. Kiburtz, J.D. Lauritzen, Christensen & Jensen P.C.; attorneys for appellee.

Recommended Citation

Brief of Appellee, *Thatcher v. Lang*, No. 20180009 (Utah Court of Appeals, 2019).

https://digitalcommons.law.byu.edu/byu_ca3/3799

This Brief of Appellee is brought to you for free and open access by BYU Law Digital Commons. It has been accepted for inclusion in Utah Court of Appeals Briefs (2007–) by an authorized administrator of BYU Law Digital Commons. Policies regarding these Utah briefs are available at http://digitalcommons.law.byu.edu/utah_court_briefs/policies.html. Please contact the Repository Manager at hunterlawlibrary@byu.edu with questions or feedback.

IN THE UTAH COURT OF APPEALS

MELANIE A. MADSEN THATCHER,

Plaintiff/Appellee/Cross-Appellant,
vs.

MICHAEL LANG,

Defendant/Appellant/Cross-Appellee.

Case No. 20180009-CA

APPEAL FROM THE FIFTH DISTRICT COURT,
WASHINGTON COUNTY, STATE OF UTAH
THE HON. G. MICHAEL WESTFALL, CIVIL NO. 120500520

SUPPLEMENTAL BRIEF OF APPELLEE/CROSS-APPELLANT

Karra J. Porter, 5223
Kristen C. Kiburtz, 12572
J. D. Lauritzen, 14237
CHRISTENSEN & JENSEN, P.C.
257 East 200 South, Suite 1100
Salt Lake City, Utah 84111-2048
Telephone: (801) 323-5000
*Attorneys for Melanie A. Madsen
Thatcher*

Bryan J. Pattison, 8766
Durham Jones & Pinegar, P.C.
192 East 200 North, Third Floor
St. George, UT 84770
(435) 674-0400
bpattison@djplaw.com
Attorneys for Michael Lang

FILED
UTAH APPELLATE COURTS

DEC 27 2019

TABLE OF CONTENTS

INTRODUCTION.....3

ARGUMENT.....3

INTRODUCTION

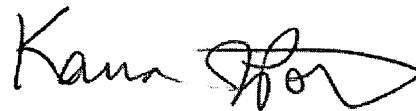
On or about December 16, 2019, the Court issued an Order requesting supplemental briefing. In its order, the Court directed the parties to file simultaneous supplemental briefs by no later than December 27, 2019 informing the Court as to whether the subject property has been sold.

ARGUMENT

Ms. Thatcher has sold the subject property. A warranty deed (Entry No. 20180036543) reflecting the conveyance was recorded with the Washington County Recorder's office on or about September 6, 2018. A corrected warranty deed (Entry No. 20180040686), dated September 12, 2018, was thereafter recorded with the Washington County Recorder's office on or about October 8, 2018.

DATED this 27th day of December, 2019.

CHRISTENSEN & JENSEN, P.C.



Karra J. Porter

Kristen C. Kiburtz

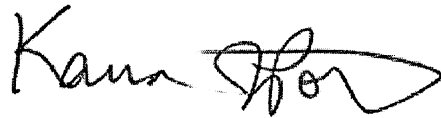
J. D. Lauritzen

Attorneys for Melanie A. Madsen Thatcher

CERTIFICATE OF SERVICE

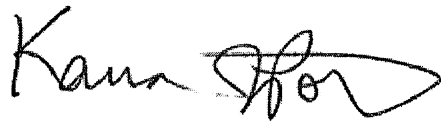
I hereby certify that on this 27th day of December, 2019, I caused to be sent via email a true and correct copy of the foregoing, **SUPPLEMENTAL BRIEF OF APPELLEE/CROSS-APPELLANT** to the following:

Bryan J. Pattison
Durham Jones & Pinegar, P.C.
192 East 200 North, Third Floor
St. George, UT 84770
bpattison@djplaw.com



CERTIFICATE OF COMPLIANCE

Pursuant to U.R.A.P. 24(f), Counsel for Plaintiff/Appellee/Cross-Appellant hereby certifies that the foregoing brief contains a proportionally spaced 13-point typeface and contains 104 words, as determined by an automatic word count feature on Microsoft Word 2016, including headings and footnotes, and excluding the table of contents, table of authorities, and the addendum. Pursuant to U.R.A.P. 21(g), counsel for Plaintiff/Appellee/Cross-Appellant certifies that the foregoing brief contains no non-public information.



Karra J. Porter
Attorneys for Plaintiff/Appellee/Cross-Appellant