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ATTORNEY FOR DEFENDANT DWAYNE PIKE

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF THE STATE  
OF IDAHO, IN AND FOR THE COUNTY OF NEZ PERCE

DPW Enterprises LLC and Mountain	)	
Prime 2018 LLC,	)	CASE NO. CV35-24-1063
	)	
Plaintiff,	)	RESPONSE TO MOTIONS
v.	)	OF CO-DEFENDANT
	)	
Jeremy L. Bass, Dwayne Pike, and Current	)	
occupant, and Unknown Parties in	)	
Possession of the real property commonly	)	
known as 1515 21 <sup>st</sup> Avenue, Lewiston,	)	
Idaho 83501,	)	
	)	
Defendants.	)	
	)	

COMES NOW the Defendant Dwayne Pike (hereinafter “Defendant Pike”), by and through his attorney of record, Ken Nagy, of Idaho Legal Aid Services, Inc., and hereby responds to the following motions filed by Co-Defendant Jeremy L. Bass (hereinafter “Defendant Bass”) in the above-entitled proceeding:

1. Motion for Appointment of Co-Counsel filed on August 14, 2024;

RESPONSE TO MOTIONS  
OF CO-DEFENDANT

KEN NAGY  
Idaho Legal Aid Services, Inc.  
Lewiston, Idaho

2. Motion to Dismiss and Strike Summons and Complaint filed on August 14, 2024;  
and
3. Motion to Amend Filings to Include Verification filed on August 19, 2024.

With regards to Defendant Bass' Motion for Appointment of Co-Counsel, it appears that said Motion repeatedly contains the same typographical error in that Defendant Bass has moved the Court to appoint "co-counsel". . .for the Plaintiff". *Mtn.* at 1-3. However, it appears that Defendant Bass is seeking the appointment of an attorney to assist him with the proceeding, not the appointment of an attorney to assist the Plaintiff DPW Enterprises LLC and Prime 2018 LLC. If that is the case, Defendant Pike does not object to said Motion. However, in the event that Defendant Bass is seeking the appointment of an attorney to assist the Plaintiff with the proceeding, Defendant Pike objects as there is no legal authority upon which the Court may accomplish such an appointment.

With regards to Defendant Bass' Motion to Dismiss and Strike Summons and Complaint, Defendant Pike does not object to said Motion.

With regards to Defendant Bass' Motion to Amend Filings to Include Verification, Defendant Pike does not object to said Motion.

DATED this 17<sup>th</sup> day of September, 2024.

IDAHO LEGAL AID SERVICES, INC.



Ken Nagy  
Attorney for Defendant Dwayne Pike

**KEN NAGY**  
Idaho Legal Aid Services, Inc.  
Lewiston, Idaho

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 17<sup>th</sup> day of September, 2024, I caused to be served a full, true and accurate copy of the foregoing by the method indicated below, and addressed to the following:

Lewis N. Stoddard  
Halliday, Watkins & Mann, P.C.  
376 East 400 South, Suite 300  
Salt Lake City, UT 84111  
Phone: (801) 355-2886  
Fax: (801) 328-9714  
Email: [lewis@wmlawfirm.com](mailto:lewis@wmlawfirm.com)

☐ U.S. mail  
☐ Hand delivered  
☐ Overnight mail  
☐ Facsimile transmission to #  
☐ Email  
☒ i-Court

Jeremy L. Bass  
1515 21<sup>st</sup> Ave.  
Lewiston, ID 83501-3926  
Email: [Quantum.J.L.Bass@RAWdeal.io](mailto:Quantum.J.L.Bass@RAWdeal.io)

☐ U.S. mail  
☐ Hand delivered  
☐ Overnight mail  
☐ Facsimile transmission to #  
☒ Email  
☐ i-Court

  
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Ken Nagy

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Lewiston, Idaho