

**Phillips v. The Eighth Judicial District Court of the State of Nevada, No. 69722,
Order Denying Petition for Writ of Prohibition or Mandamus (Unpublished
Disposition July 13, 2016)
SC UNPUB**

Pursuant to *Argentena*, personal jurisdiction over an attorney can be based on “the attorney’s appearance as the client’s counsel of record.” Here, Petitioner filed the complaint on behalf of his clients and moved for an adjudication of his lien, thus placing himself within the jurisdiction of the district court.

Furthermore, Petitioner had a common law retaining lien on his clients' files and the UIM proceeds. The district court’s jurisdiction over the retaining lien was governed by *Argentena*, in which it was held that a district court could adjudicate a retaining lien with the consent of the clients. Here, his clients consented to the district court’s adjudication of the retaining lien, giving the district court jurisdiction to do so.

Thus, the district court had both personal and subject matter jurisdiction over the matter.