

SUPREME COURT OF NEVADA

Yanling Zhang v. Yanhui Zhang

142 Nev. Adv. Op. No. 45 · No. 90509 · Decided June 18, 2026

SUMMARY

The Nevada Supreme Court held that a party seeking quantifiable damages in a civil action must disclose a computation of damages under NRCP 16.1. However, because excluding the appellant’s damages evidence effectively terminated the case, the district court was required to analyze the Young v. Johnny Ribeiro Building, Inc. factors before imposing that case-ending sanction. The court vacated the dismissal with prejudice and remanded for that analysis.

CASE DETAILS

COURT	Supreme Court of Nevada
WRITING FOR THE COURT	Cadish, J.; Stiglich, J.; Lee, J.
JURISDICTION	Supreme Court of Nevada
DECIDED	June 18, 2026
DOCKET	90509
DISPOSITION	vacated
PROCEDURAL POSTURE	Appeal from a district court order dismissing a complaint with prejudice after the district court granted a motion in limine barring the plaintiff from presenting damages evidence for failure to provide a required damages computation.
STANDARD OF REVIEW	Discovery sanctions are generally reviewed for abuse of discretion. A somewhat heightened standard applies to case-terminating sanctions; the sanction must be just and related to the claims at issue.
PRECEDENTIAL VALUE	Published Nevada Supreme Court opinion
PARTIES	Yanling Zhang v. Yanhui Zhang

TOPICS

- discovery dispute
- sanctions
- appellate procedure
- civil procedure
- breach of contract

PRACTICE AREAS

- civil procedure
- appellate procedure
- commercial litigation
- contracts
- real estate

QUESTIONS PRESENTED

1. Whether NRCP 16.1(a)(1)(A)(iv) required Yanling to disclose a computation of her claimed damages.
2. Whether the district court abused its discretion by imposing an effectively case-terminating sanction without analyzing the factors required by *Young v. Johnny Ribeiro Building, Inc.*
3. Whether the district court was required to address whether the disclosure failure was substantially justified or harmless under NRCP 37(c)(1).

HOLDINGS

1. NRCP 16.1(a)(1)(A)(iv) required Yanling to disclose a computation of each category of damages claimed because her contract- and tort-based claims sought tangible, quantifiable damages based on her \$200,000 investment and the rental income or sale proceeds from the properties.
2. When a discovery sanction under NRCP 37 ultimately and necessarily results in dismissal with prejudice, the district court must expressly and carefully analyze the *Young* factors before imposing the sanction. Barring all damages evidence had the practical effect of terminating Yanling's case, so the district court abused its discretion by failing to conduct that analysis.
3. On remand, the district court must address whether Yanling's failure to properly disclose damages was substantially justified or harmless under NRCP 37(c)(1) as part of analyzing the propriety of the case-ending sanction.

KEY QUOTATIONS

“We agree with Yanling that when a district court issues a discovery sanction under NRCP 37 that ultimately and necessarily results in a dismissal with prejudice—here, granting a motion in limine to bar evidence of damages—the district court must support its order “by an express, careful and preferably written explanation of the court’s analysis of the pertinent factors.”” (at 8)

*“A district court cannot issue a discovery sanction for failing to provide required disclosures under NRCP 16.1 that, in effect, is a case-ending sanction without analysis of the *Young* factors.” (at 9)*

FACTUAL BACKGROUND

Yanling alleged that she contributed \$200,000 toward Yanhui's purchase of four Las Vegas residential properties pursuant to an unwritten joint venture under which Yanling would receive one-half of rental income and sale proceeds. Yanhui took title in her own name, later sold one property, and retained the proceeds. Yanling brought claims including breach of contract, breach of the implied covenant of good faith and fair dealing, unjust enrichment, and conversion.

PROCEDURAL HISTORY

Yanling Zhang sued Yanhui Zhang over an alleged joint venture involving four investment properties. After setting aside an entry of default, the district court considered Yanhui's motion in limine under NRCP 16.1 and barred evidence of special damages because Yanling had not timely provided a computation. The district court then dismissed the complaint with prejudice, concluding that no claims remained for trial. The Supreme Court of

Nevada held that the damages computation was required but vacated the dismissal because the district court had not analyzed the Young factors applicable to case-terminating discovery sanctions.

DISPOSITION

vacated

REMAND INSTRUCTIONS

Vacate the order granting dismissal with prejudice and remand for the district court to analyze the Young factors, including whether Yanling's failure to properly disclose damages was substantially justified or harmless under NRCP 37(c)(1).

CASES CITED

- Young v. Johnny Ribeiro Building, Inc., 106 Nev. 88, 787 P.2d 777 (1990)
- Foster v. Dingwall, 126 Nev. 56, 227 P.3d 1042 (2010)
- Pizarro-Ortega v. Cervantes-Lopez, 133 Nev. 261, 396 P.3d 783 (2017)
- Calvert v. Ellis, No. 2:13-CV-00464-APG, 2015 WL 631284 (D. Nev. Feb. 12, 2015)
- Capanna v. Orth, 134 Nev. 888, 432 P.3d 726 (2018)
- Reads Co., LLC v. Katz, 72 A.D.3d 1054 (N.Y. App. Div. 2010)