

IN THE SUPREME COURT OF NEVADA

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BOULDER CAB, INC.,	Sup. Ct. No. 68949
Petitioners,	
vs.	Dist. Ct No.: A-13-691551-C
THE EIGHTH JUDICIAL DISTRICT	Dept. No. XVI
COURT of the State of Nevada, in	
and For the County of Clark, and	REAL PARTIES IN INTEREST'S
THE HONORABLE TIMOTHY C.	RESPONSE IN OPPOSITION TO
WILLIAMS, District Judge,	PETITIONER'S MOTION TO
Respondents,	SUPPLEMENT BRIEFS
AND	REGARDING PETITION FOR
DAN HERRING,	WRIT OF MANDAMUS
Real Party in Interest	

MEMORANDUM OF POINTS AND AUTHORITIES

**I. PETITIONER'S PROPOSED SUPPLEMENT OFFERS
IRRELEVANT SPECULATION AND SUPPOSITION**

The abject vapidness of the petitioner's proposed supplemental brief is readily apparent. Real party in interest does not want to waste the Court's time with its manifest frivolity. Petitioner suggests the irrelevancy that Article 15,

Section 15, of the Nevada Constitution (the minimum wage amendment or “MWA”) was “never intended” to be part of the Nevada Constitution but was drafted as a proposed statutory enactment. If so that does not change its status - it *is* part of the Nevada Constitution, duly placed therein by a vote of the citizens of Nevada as a result of two consecutive statewide elections. The balance of petitioner’s supplemental brief muses on the inequity it allegedly faces if this Court’s decision in *Thomas v. Nevada Yellow Cab*, 327 P.3d 518 (2014) is not applied in a purely prospective fashion. Petitioner also points out the broad powers of this Court to interpret and apply the law taking into account what it terms are “real world factors.” The former claim has already been fully presented in petitioner’s prior arguments and the Court is quite aware of the latter.

Petitioner’s motion should be denied.

Dated: July 12, 2016

Submitted by:

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