

IN THE SUPREME COURT OF NEVADA

Electronically Filed
Jan 22 2016 08:42 a.m.

Sup. Ct. No. 68975
Tracie K. Lindeman
Clerk of Supreme Court
Dist. Ct No.:A-12-661726-C
Dept. No. XXVIII

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NEVADA YELLOW CAB)
CORPORATION, NEVADA)
CHECKER CAB CORPORATION,)
NEVADA STAR CAB)
CORPORATION,)

) Petitioners,

vs.)

THE EIGHTH JUDICIAL DISTRICT)
COURT of the State of Nevada, in)
and For the County of Clarki, and)
THE HONORABLE RONALD J.)
ISRAEL, District Judge,)

) Respondents,

) AND

CHRISTOPHER THOMAS and)
CHRISTOPHER CRAIG,)

) Real Parties in Interest
_____)

MOTION FOR LEAVE TO FILE *AMICUS CURIAE BRIEF*

RICHARD SEGERBLOM
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Attorney for Amicus Curiae Industrial Technical Professional Employees
Union/Office and Professional Employees International Union Local 4873,
AFL-CIO

The Industrial Technical Professional Employees Union/Office and Professional Employees International Union Local 4873, AFL-CIO (ITPEU) respectfully moves this Court for leave to file the brief submitted herewith, as *amicus curiae* in support of Real Parties in Interest Christopher Thomas and Christopher Craig Answer to Petitioner's Writ of Mandamus. The ITPEU has, pursuant to the provisions of the National Labor Relations Act, been certified as the collective bargaining representative of the YCS taxi drivers who are affected by this Court's decision in this case. The ITPEU, as the labor union representing the YCS taxi drivers, is an organization controlled by its members, including the YCS taxi drivers. As such it is in a unique position to express the views and interests of its members, the YCS taxi drivers, who have a direct and personal interest in this proceeding.

Wherefore, the ITPEU as *amicus curiae* in support of the Real Parties in Interest respectfully requests that the Court grant this Motion for Leave to File Amicus Curiae Brief, as filed herewith.

Dated this 21st day of January 2016.

Respectfully submitted.

/s/ Richard Segerblom

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CERTIFICATE OF MAILING

The undersigned certifies that on January 21, 2016 he served the within:

MOTION TO FILE AMICUS BRIEF AND
AMICUS BRIEF IN SUPPORT OF
ANSWER TO WRIT OF MANDAMUS

by court electronic service to

Marc C. Gordon, Esq.
Yellow Checker Star Transportation Co. Legal Dept.
5225 W. Post Road
Las Vegas, NV 89118

and

by depositing the same in the U.S. mail, first class postage, prepaid, addressed as follows:

The Honorable Ronald J. Israel
Regional Justice Center
Department 28
200 Lewis Avenue
Las Vegas, Nevada 89155

/s/ Richard Segerblom

RICHARD SEGERBLOM, ESQ.