

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * *

JAMES D. BALODIMAS, M.D.;
JAMES D. BALODIMAS, M.D., PC;
LAS VEGAS RADIOLOGY, LLC, a
Nevada Limited Liability Company;
BRUCE A. KATUNA, M.D.; ROCKY
MOUNTAIN NEURODIAGNOSTICS,
LLC, a Colorado Limited Liability
Company; ANDREW M. CASH, M.D.;
ANDREW M. CASH, M.D., P.C. aka
ANDREW MILLER CASH, M.D., P.C.;
and DESERT INSTITUTE OF SPINE
CARE, LLC, a Nevada Limited Liability
Company,

Petitioner,

vs.

THE EIGHTH JUDICIAL DISTRICT
COURT, of the State of Nevada, in and
for the County of Clark, and the
HONORABLE JERRY A. WIESE,
District Court Judge,

Respondents

REPUBLIC SILVER STATE
DISPOSAL, INC., a Nevada
Corporation; JAMES D. BALODIMAS,
M.D.; JAMES D. BALODIMAS, M.D.,
P.C.; DANIELLE MILLER aka
DANIELLE SHOPSHIRE;
NEUROMONITORING ASSOCIATES,
INC.,

Real Parties in Interest.

SUPREME COURT CASE NO.:
72123

EIGHTH JUDICIAL DISTRICT
COURT CASE NO.: A-16-738123-C

PETITIONERS, ANDREW M.
CASH, M.D.; ANDREW M. CASH,
M.D., P.C. AKA ANDREW
MILLER CASH, M.D., P.C.; &
DESERT INSTITUTE OF SPINE
CARE, LLC'S JOINDER TO
PETITIONER BALODIMAS'
RESPONSE TO ANSWER TO
PETITION FOR WRIT OF
MANDAMUS AND WRIT OF
PROHIBITION

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and Desert Institute of Spine Care,
LLC

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Apr 28 2017 08:45 a.m.
Elizabeth A. Brown
Nevada Supreme Court

1 Petitioners, Andrew M. Cash, M.D.; Andrew M. Cash, M.D., P.C. aka
2 Andrew Miller Cash, M.D., P.C.; & Desert Institute of Spine Care, LLC
3
4 (“Petitioners”) by and through their attorneys of record, ROBERT C. McBRIDE,
5 ESQ. and HEATHER S. HALL, ESQ. of CARROLL, KELLY, TROTTER,
6 FRANZEN, McKENNA & PEABODY, hereby submit this Joinder to Petitioner
7
8 Balodimas’ Response to Answer to Petition for Writ of Mandamus and Writ of
9 Prohibition.

10 This Joinder is made and based upon the papers and pleadings on file herein
11
12 and any documentary evidence and oral argument that may be presented at the time
13 of the hearing of this matter. These Petitioners hereby adopt the following as set
14 forth in Petitioners James D. Balodimas, M.D. and James D. Balodimas, M.D.,
15 P.C.’s Response to Answer to Petition for Writ of Mandamus and Writ of
16 Prohibition: (I) Introduction; (II) Discussion; and (III) Conclusion. These
17
18 Petitioners expressly adopt all factual and legal arguments contained therein.
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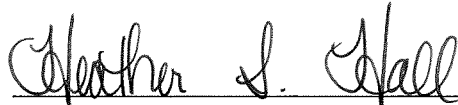
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1 By this Joinder, these Petitioners respectfully request that the Court grant the
2 Petition for Writ of Mandamus.
3

4 Dated this 27th day of April, 2017.

5 CARROLL, KELLY, TROTTER,
6 FRANZEN, McKENNA & PEABODY

7 

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17 *P.C.; & Desert Institute of Spine Care, LLC*

1 **NRAP 28.2 ATTORNEY'S CERTIFICATE OF COMPLIANCE**

2 1. I hereby certify that this brief complies with the formatting
3 requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and
4 the type style requirements of NRAP 32 (a)(6) because:
5

6 [X] It has been prepared in proportionally spaced typeface using Word in
7
8 14 point Times New Roman Font.

9 2. I further certify that this brief complies with the page-or type-volume
10 limitations of NRAP 32(a)(7) because, excluding the parts of the brief exempted by
11 NRAP 32(a)(7)(C), it is:
12

13 [X] Proportionally spaced, has a typeface font of 14 points or more, and
14 contains 235 words.
15

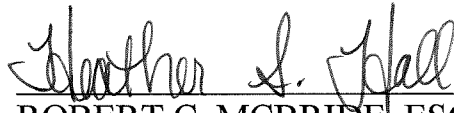
16 3. I hereby certify that I have read Petitioners, Andrew M. Cash, M.D.;
17 Andrew M. Cash, M.D., P.C. aka Andrew Miller Cash, M.D., P.C.; & Desert
18 Institute of Spine Care, LLC Joinder to Petitioner Balodimas' Response to Answer
19 to Petition for Writ of Mandamus and Writ of Prohibition, and to the best of my
20 knowledge, information, and belief, it is not frivolous or interposed for any
21 improper purposes. I further certify that this brief complies with all applicable
22 Nevada Rules of Appellate Procedure, in particular NRAP 28(e), which requires
23 every assertion in the brief regarding matters in the record to be supported to a
24 reference to the page of the transcript or appendix where the matter relied on is to
25
26
27
28

1 be found.

2 I understand that I may be subject to sanctions in the event that the
3
4 accompanying brief is not in conformity with the requirements to the Nevada
5 Rules of Appellate Procedure.

6 Dated this 27th day of April, 2017.

7
8 CARROLL, KELLY, TROTTER,
FRANZEN, McKENNA & PEABODY

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20 *P.C.; & Desert Institute of Spine Care, LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 21 day of April, 2017, a true and correct copy of the foregoing **PETITIONERS, ANDREW M. CASH, M.D.; ANDREW M. CASH, M.D., P.C. AKA ANDREW MILLER CASH, M.D., P.C.; & DESERT INSTITUTE OF SPINE CARE, LLC'S JOINDER TO PETITIONER BALODIMAS' RESPONSE TO ANSWER TO PETITION FOR WRIT OF MANDAMUS AND WRIT OF PROHIBITION** was electronically filed and served in accordance with the Master Service List as follows:

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(Via U.S. Mail)

The Honorable Jerry A. Wiese
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