

No. 74876

---

IN THE SUPREME COURT OF THE STATE OF NEVADA

---

WASTE MANAGEMENT OF NEVADA, INC.,

*Appellant,*

vs.

WEST TAYLOR STREET, LLC,

*Respondent.*

---

Appeal from the Second Judicial District Court, The Honorable  
Connie J. Steinheimer (Case No. CV12-02995)

---

**ERRATA TO REPUBLIC SILVER STATE DISPOSAL,  
INC.'S REPLY IN SUPPORT OF MOTION FOR LEAVE  
TO FILE AN *AMICUS CURIAE* BRIEF IN SUPPORT OF  
APPELLANT AND REVERSAL**

---

Tamara Beatty Peterson, Esq.  
Nevada Bar No. 5218  
tpeterson@petersonbaker.com  
Nikki L. Baker, Esq.  
Nevada Bar No. 6562  
nbaker@petersonbaker.com  
PETERSON BAKER, PLLC  
10001 Park Run Drive  
Las Vegas, NV 89145  
(702) 786-1001

*Counsel for the Amicus Curiae*

Electronically Filed  
Aug 15 2018 08:29 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

Republic Silver State Disposal, Inc. ("Republic"), submits its Errata to Reply in Support of Motion for Leave to File an *Amicus Curiae* Brief in Support of Appellant and Reversal.

Republic erroneously failed to include its signature block on page 5 of its Reply in Support of Motion for Leave to File an *Amicus Curiae* Brief in Support of Appellant and Reversal ("Reply") filed August 13, 2018 in the present action. A correct copy page 5 of the Reply is attached to this Errata as Exhibit 1.

DATED this 14th day of August, 2018.

Respectfully submitted,

By: /s/ Tamara Beatty Peterson  
Tamara Beatty Peterson, Esq.  
Nevada Bar No. 5218  
Nikki L. Baker, Esq.  
Nevada Bar No. 6562  
PETERSON BAKER, PLLC  
10001 Park Run Drive  
Las Vegas, NV 89145  
(702) 786-1001

## **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **ERRATA TO REPUBLIC SILVER STATE DISPOSAL, INC.'S REPLY IN SUPPORT OF MOTION FOR LEAVE TO FILE AN *AMICUS CURIAE* BRIEF IN SUPPORT OF APPELLANT AND REVERSAL** with the Clerk of the Court of the Supreme Court of Nevada by using the Court's Electronic Filing System on August 14, 2018.

I certify that the participants in the case are listed below and are registered electronic filing users and the service will be accomplished by the Court's Electronic Filing system.

MARK G. SIMONS, ESQ.  
mark@mgsimonslaw.com  
SIMONS LAW, PC  
9490 S. McCarran Blvd., #C-20  
Reno, Nevada 89509  
*Attorneys for Appellant Waste  
Management of Nevada, Inc.*

C. NICHOLAS PEREOS, ESQ.  
C. NICHOLAS PEREOS, LTD.  
1610 Meadow Wood Lane  
Suite 202  
Reno, NV, 89502  
*Attorneys for Respondent West  
Taylor Street, LLC*

/s/ Erin L. Parcels  
an employee of Peterson Baker, PLLC

# **EXHIBIT 1**

# **EXHIBIT 1**

brief.<sup>3</sup>

In sum, Respondent's tactical request to limit the Court's consideration of Republic's arguments provides no basis to deny Republic's Motion. In deciding this appeal, the Court should consider not just the specific findings of the District Court's Order, but the broad implications of its decision. It should do so here, with whatever assistance Republic's *Amicus Curiae* brief may provide. For the reasons set forth above and in its Motion, Republic respectfully requests that the Court grant the Motion pursuant to NRAP 29(a).

DATED this 13th day of August, 2018.

Respectfully submitted,

By: /s/ Tamara Beatty Peterson  
Tamara Beatty Peterson, Esq.  
Nevada Bar No. 5218  
Nikki L. Baker, Esq.  
Nevada Bar No. 6562  
PETERSON BAKER, PLLC  
10001 Park Run Drive  
Las Vegas, NV 89145  
(702) 786-1001

---

<sup>3</sup> See *Nevada Power Co. v. Haggerty*, 115 Nev. 353, 365 n.9, 989 P.2d 870, 877 (1999) (finding that, although an argument concerning statutory interpretation was presented for the first time in an *amicus curiae* brief, the Court would, in the interests of judicial economy, "address the matter at this time" rather than require the party to raise the issue in district court).