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1 Appellant Waste Management of Nevada, Inc., ("WM") by and through its
2 attorney Mark G. Simons of SIMONS HALL JOHNSTON PC, hereby submits its
3 opposition to the Motion to Reschedule Hearing as to Time and Place.
4

5 WM opposes the motion since WM and its counsel have already arranged
6 and paid for travel and lodging to attend the Oral Argument on WM's appeal,
7 which is scheduled to take place on April 2, 2019, in Las Vegas, Nevada. Further,
8 WM opposes the motion because any further delay in rendering a decision on
9 WM's appeal is causing WM hundreds of thousands of dollars in financial harm.
10
11

12 In addition, there are numerous flights between Reno and Las Vegas that
13 leave early enough in the morning to arrive and participate in the 10:00 a.m.
14 hearing. Specifically, as of March 5, 2019, Southwest Airlines online reservation
15 system is showing flights departing Reno to Las Vegas on April 2, 2019, at 5:20
16 a.m. with a 6:40 a.m. arrival for \$78.00 and a 6:55 a.m. departure with an 8:15 a.m.
17 arrival for \$91.00. See Exhibit 1. Accordingly, in relation to the amount of harm
18 being sustained by WM, the flight costs are minimal and do not justify any further
19 delay.
20
21

22 DATED this 6th day of March, 2019.
23

24 SIMONS HALL JOHNSTON PC
25 6490 S. McCarran Blvd., Ste. F-46
26 Reno, NV 89509

27 By: 

28 MARK G. SIMONS NV State Bar No. 5132
Attorneys for Appellant

CERTIFICATE OF SERVICE

Pursuant to NRAP 25, I certify that I am an employee of SIMONS HALL JOHNSTON PC, and that on this date I caused to be served a true copy of the **OPPOSITION TO MOTION TO RESCHEDULE HEARING AS TO TIME AND PLACE** on all parties to this action by the method(s) indicated below:

☒ by using the Supreme Court Electronic Filing System:

C. Nicholas Pereos, Esq.
Attorneys for Respondent

DATED: This 4 day of March, 2019.


An employee of Simons Hall Johnston PC

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EXHIBIT LIST

NO.	DESCRIPTION	PAGES
1	Southwest Printout	1

EXHIBIT 1

EXHIBIT 1



RNO → LAS

Monday

Sort by Departure time Filter by All day

Departing flights

Change planes

Business Select

Anytime

Wanna Get Away

SUN
Mar 31

MON
Apr 01

TUE
Apr 02

WED
Apr 03

THU
Apr 04



Low Fare
Calendar



First 2 bags fly free®

Weight, size & excess limits apply

View fare type benefits

Plus no
change fees*,
no hidden
fees,

and no what-the-heck-
was-that-even-for fees.

(That's Transparency!)

*Fare difference may apply.

2 free checked bags
(1st and 2nd checked
bags fly free. Weight and
size limits apply.)

No change fee
(Fare difference may
apply.)

Reusable funds

EarlyBird eligible

Refundable

Priority boarding A1-A15

Fly By® (Priority Security Lane)

Complimentary premium drink

Rapid Rewards® earning
formula

Business Select

Anytime

Wanna Get Away

✓

✓

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N/A

✓

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✓

✓

✓

✓

12x Fare

10x Fare

6x Fare

Nonstop #1447

5:20AM → 6:40AM

Duration
1h 20m

\$271

\$249

\$78

Nonstop #2250

6:55AM → 8:15AM

Duration
1h 20m

\$271

\$249

\$128

Nonstop #323

9:15AM → 10:30AM

Duration
1h 15m

\$271

\$249

\$128

Nonstop #561

10:05AM → 11:25AM

Duration
1h 20m

\$271

\$249

\$128

Nonstop #1803

11:00AM → 12:15PM

Duration
1h 15m