

IN THE SUPREME COURT OF THE STATE OF NEVADA

MDB TRUCKING, LLC,

Appellant,

vs.

VERSA PRODUCTS COMPANY,
INC.,

Respondent.

Supreme Court Case Nos.:

75022, consolidated with 75021
75319, consolidated with 75318
75321, consolidated with 75320
Electronically Filed
Sep 26 2018 03:23 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

[District Court Case Nos.:
CV15-02349, CV16-00976 and
CV16-01914]

**NOTICE OF NON-RESPONSE TO APPELLANT/CROSS-RESPONDENT
MDB TRUCKING, LLC'S MOTION TO CONSOLIDATE APPEALS**

TO THE COURT, THE RESPONDENT/CROSS-APPELLANT, AND THE
ATTORNEYS OF RECORD FOR RESPONDENT/CROSS-APPELLANT:


PLEASE TAKE NOTICE THAT Appellant/Cross-Defendant MDB
Trucking, LLC ("MDB"), by and through its counsel of record Nicholas M.
Wieczorek, Esq., Jeremy J. Thompson, Esq. and Colleen E. McCarty, Esq. of the
law firm of Clark Hill PLLC, filed and served its Motion to Consolidate Appeals
("Motion") on Respondent/Cross-Appellant Versa Products Company, Inc.
("Versa") on September 10, 2018. Pursuant to NRAP 27(a)(3)(A), the deadline for
Versa to file and serve any response to MDB's Motion was Monday, September
24, 2018.

MDB respectfully asserts that, pursuant to NRAP 27(c)(2), a Justice may
now act on MDB's Motion. MDB respectfully requests said Justice enter an Order

granting the Motion in its entirety and further consolidating Case Nos. 75022, 75319 and 75321 prior to the filing deadline for MDB's Opening Brief.

Dated this 26th day of September, 2018.

CLARK HILL PLLC

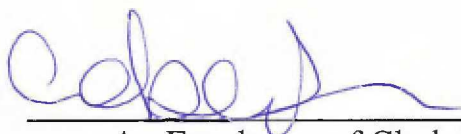
By: 
NICHOLAS M. WIECZOREK
Nevada Bar No. 6170
JEREMY J. THOMPSON
Nevada Bar No. 12503
COLLEEN E. MCCARTY
Nevada Bar No. 13186
3800 Howard Hughes Pkwy., Ste. 500
Las Vegas, Nevada 89169
Tel: (702) 862-8300
Attorneys for Appellant/Cross-Respondent
MDB Trucking, LLC

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Clark Hill PLLC and that on this 26th day of September, 2018, I served a true and correct copy of the foregoing
**NOTICE OF NON-RESPONSE TO APPELLANT/CROSS-RESPONDENT
MDB TRUCKING, LLC'S MOTION TO CONSOLIDATE APPEALS** as follows:

- ☐ By personally serving it upon counsel of record for Respondent/Cross-Appellant; or
- ☒ By placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada.

Josh Cole Aicklen, Esq.
David B. Avakian, Esq.
Paige S. Shreve, Esq.
LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 S. Rainbow Blvd., Suite 600
Las Vegas, Nevada 89118
Attorneys for Respondent/Cross-Appellant
Versa Products Company, Inc.



An Employee of Clark Hill PLLC