

**In The Supreme Court of the State Of Nevada**

---

***Supreme Court Case No. 75053***

---

Electronically Filed  
Sep 08 2020 04:45 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

JAMES J. COTTER, JR., Individually )  
And Derivatively on Behalf of )  
Reading International, Inc., )

Petitioner, )

v. )

Coordinated with Case  
Nos. 76981, 77648, 77333

DOUGLAS McEACHERN, EDWARD )  
KANE, JUDY CODDING, MICHAEL )  
WROTNIAK, MARY ANN GOULD, )  
Personal Representative of the Estate of )  
William Gould, AND Nominal Defendant )  
READING INTERNATIONAL, INC., )  
a Nevada Corporation, )

District Court Case  
No. A-15-719860-B

Respondents. )

**Appeal**

Eighth Judicial District Court, Dept. XI  
The Honorable Elizabeth G. Gonzalez

**NOTICE OF RESPONDENTS ELLEN COTTER, MARGARET COTTER,  
GUY ADAMS, DOUGLAS McEACHERN, EDWARD KANE, JUDY  
CODDING, MICHAEL WROTNIAK, AND MARY ANN GOULD  
CLARIFYING STATEMENT MADE AT ORAL ARGUMENT**

H. STAN JOHNSON, ESQ. (SBN 00265)  
COHEN JOHNSON LLC  
375 E. Warm Springs Road  
Suite 104  
Las Vegas, Nevada 89119  
(702) 823-3500  
sjohnson@cohenjohnson.com

CHRISTOPHER TAYBACK, ESQ.\*  
MARSHALL M. SEARCY, ESQ.\*  
QUINN EMANUEL URQUHART &  
SULLIVAN LLP  
865 South Figueroa Street,  
10th Floor  
Los Angeles, CA 90017  
213-443-3000  
christayback@quinnemanuel.com  
marshallsearcy@quinnemanuel.com  
*\*Admitted Pro Hac Vice*

## NOTICE

Respondents Ellen Cotter, Margaret Cotter, Guy Adams, Douglas McEachern, Edward Kane, Judy Coddington, Michael Wrotniak, and Mary Ann Gould (personal representative of the Estate of William Gould) (collectively, the “Director Defendants”) submit this notice to clarify a statement made by their attorney, Christopher Tayback of Quinn Emanuel Urquhart & Sullivan LLP, at the oral argument before the Nevada Supreme Court held in this coordinated matter on September 8, 2020.

On February 1, 2017, the Director Defendants filed a Petition for Writ of Prohibition or, in the Alternative, Mandamus after denial of partial summary judgment by the District Court (Nevada Supreme Court Case No. 72261). The Director Defendants’ challenge to Cotter Jr.’s derivative standing was the focus of that writ petition.<sup>1</sup> This Court denied the Director Defendants’ writ petition in an order dated April 14, 2017.<sup>2</sup>

Dated this 8th day of September 2020.

---

<sup>1</sup> See 2/1/17 Writ Petition at pp. 19–48 (Nev. Supreme Court Case No. 72261).

<sup>2</sup> See 4/14/17 Order at 1–2.

COHEN JOHNSON LLC

By: /s/ H. Stan Johnson  
H. Stan Johnson, Esq. (00265)  
375 E. Warm Springs Road, Suite 104  
Las Vegas, Nevada 89119

Christopher Tayback, Esq.\*  
Marshall M. Searcy, Esq.\*  
Quinn Emanuel Urquhart & Sullivan, LLP  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017

*Attorneys of Record for Respondents Ellen  
Cotter, Margaret Cotter, Guy Adams, Douglas  
McEachern, Edward Kane, Judy Coddling,  
Michael Wrotniak, and Mary Ann Gould,  
Personal Representative of the Estate of  
William Gould*

**CERTIFICATE OF SERVICE**

Pursuant to NRAP 25, I certify that I am an employee of  
COHEN|JOHNSON|PARKER|EDWARDS, that in accordance therewith, I caused  
a copy of the **NOTICE OF RESPONDENTS ELLEN COTTER, MARGARET  
COTTER, GUY ADAMS, DOUGLAS MCEACHERN, EDWARD KANE,  
JUDY CODDING, MICHAEL WROTNIAK, AND MARY ANN GOULD  
CLARIFYING STATEMENT MADE AT ORAL ARGUMENT** to be served as  
indicated below, on the date and to the addressee(s) shown below:

VIA THE COURT'S ELECTRONIC FILING SYSTEM, ON SEPTEMBER 8,  
2020

Tami Cowden  
Mark Ferrario  
Steve Morris  
H. Johnson  
Kara Hendricks

*/s/ Sarah Gondek*  
An employee of Cohen Johnson LLC