

Glen Rothner (*Pro hac vice*)
Jonathan M. Cohen (10551)
Maria Keegan Myers (12049)
ROTHNER, SEGALL & GREENSTONE
510 South Marengo Avenue
Pasadena, California 91101
Telephone: (626) 796-7555
Facsimile: (626) 577-0124
E-mail:

Electronically Filed
Mar 05 2020 09:48 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

Attorneys for Respondent
SERVICE EMPLOYEES INTERNATIONAL UNION

IN THE SUPREME COURT OF THE STATE OF NEVADA

ROBERT CLARKE, AN INDIVIDUAL,

Appellant,

v.

SERVICE EMPLOYEES
INTERNATIONAL UNION, A
NONPROFIT COOPERATIVE
CORPORATION; AND CLARK
COUNTY PUBLIC EMPLOYEES
ASSOCIATION, A/K/A SEIU 1107, A
NON-PROFIT COOPERATIVE
CORPORATION

Respondents.

Supreme Court No. 80520
District Case No. A764942

**RESPONSE TO APPELLANT'S
DOCKETING STATEMENT**

Pursuant to Nevada Rule of Appellate Procedure 14(f), respondents Service Employees International Union and Nevada Service Employees Union (collectively, “Respondents”) hereby jointly respond to appellant Robert Clarke’s docketing statement, filed on March 2, 2020.

In his answer to question 22 of his docketing statement, Clarke notes that “[o]nly one plaintiff appealed. Dana Gentry chose not to appeal due to personal reasons. *Any ruling in favor of Robert Clarke would also apply to Ms. Gentry’s claims.*” (emphasis added.)

Respondents dispute the portion of Clarke’s response italicized above. Although briefing on the matter is premature at this stage, Respondents object to that assertion and reserve their right to contest it at the appropriate time.

DATED: March 5, 2020

ROTHNER, SEGALL & GREENSTONE

By /s/ Jonathan Cohen
Jonathan Cohen
Attorneys for Respondent
SERVICE EMPLOYEES INTERNATIONAL
UNION

DATED: March 5, 2020

CHRISTENSEN JAMES & MARTIN

By /s/ Evan L. James
Evan L. James
Attorneys for Respondent
NEVADA SERVICE EMPLOYEES UNION

CERTIFICATE OF SERVICE

Clarke v. Service Employees International Union, et al.

Supreme Court No. 80520

Case No. A-17-764942-C

I hereby certify that on this date, 5th day of March, 2020, I submitted the foregoing **RESPONSE TO APPELLANT'S DOCKETING STATEMENT** for filing and service through the Court's eFlex electronic filing service. According to the system, electronic notification will automatically be sent to the following:

Michael J. Mcavoyamaya 4539 Paseo Del Ray Las Vegas, NV 89121 Tel: (702) 685-0879 Email:Mmcavoyamayalaw@gmail.com	Evan L. James Christensen James & Martin 7440 W. Sahara Avenue Las Vegas, NV 89117 Tel: (702) 255-1718 Fax: (702) 255-0871 Email: elj@cjmlv.com
---	---

I hereby certify that on March 5, 2020, I caused such envelope to be placed in the Unites States Mail by depositing a true and correct copy of **RESPONSE TO APPELLANT'S DOCKETING STATEMENT** with prepaid first-class postage, addressed as follows:

Hon. Stephen E. Haberfeld
8224 Blackburn Avenue, Suite 100
Los Angeles, CA 90048
Tel: (323) 697-9494

/s/ Lisa C. Posso
Lisa C. Posso