

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

SOMERSETT OWNERS  
ASSOCIATION, a Domestic Non-  
Profit Corporation,

Appellant,

vs.

SOMERSETT DEVELOPMENT  
COMPANY, LTD, a Nevada  
Limited Liability Company;  
SOMERSETT, LLC a dissolved  
Nevada Limited Liability Company;  
SOMERSETT DEVELOPMENT  
CORPORATION, a dissolved  
Nevada Corporation; ; Q & D  
CONSTRUCTION, INC., a Nevada  
Corporation; PARSONS BROS  
ROCKERIES, INC. a Washington  
Corporation; STANTEC  
CONSULTING SERVICES, INC.,  
an Arizona Corporation,

Respondents.

SOMERSETT OWNERS  
ASSOCIATION, a Domestic Non-  
Profit Corporation,

Appellant,

vs.

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Apr 10 2020 11:33 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**Case No. 79920**

**Case No. 79921**

District Court Case No.:  
CV-1702427

Judge: Hon. Elliott A. Sattler

SOMERSETT DEVELOPMENT  
COMPANY, LTD, a Nevada  
Limited Liability Company;  
SOMERSETT, LLC a dissolved  
Nevada Limited Liability Company;  
SOMERSETT DEVELOPMENT  
CORPORATION, a dissolved  
Nevada Corporation; ; Q & D  
CONSTRUCTION, INC., a Nevada  
Corporation; PARSONS BROS  
ROCKERIES, INC. a Washington  
Corporation; STANTEC  
CONSULTING SERVICES, INC.,  
an Arizona Corporation,

Respondents.

### **MOTION TO CONSOLIDATE APPEALS**

This Court, by order dated March 30, 2020, consolidated Cases No. 79920 and 79921.

Three Respondents in those matters (Stantec Consulting Services, Inc.; Q & D Construction, Inc.; and Somerset Development Co., Inc.) have now filed notices of appeal in the same district court case below, seeking review of denials of motions for attorney fees and associated relief. Appellants here ask the Court to consolidate those actions—**Cases No. 80843, No. 80880, and 80881**—with the present consolidated appeals pursuant to NRAP 3(b)(2), to achieve efficiency in the Court’s review and to focus the briefing and presentations of the

parties. The parties would also be served by the setting of a unified briefing schedule for what will now effectively be two appeals and three cross-appeals.

Respectfully submitted this 10th day of April, 2020.

**WOLF, RIFKIN, SHAPIRO, SCHULMAN &  
RABKIN, LLP**

By: /s/ Bradley S. Schrager, Esq.

DON SPRINGMEYER, ESQ. (NSB: 1021)  
BRADLEY SCHRAGER, ESQ. (NSB: 10217)  
JOHN SAMBERG, ESQ. (NSB 10828)  
ROYI MOAS, ESQ. (NSB 10686)  
5594 B Longley Lane  
Reno, Nevada 89511  
(775) 853-6787/Fax (775) 853-6774

*Attorneys for Appellant Somersett Owners Association*

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of April, 2020, a true and correct copy of the foregoing **MOTION TO CONSOLIDATE APPEALS** was served upon all counsel of record by electronically filing the document using the Nevada Supreme Court's electronic filing system in all named cases herein.

By: /s/ Dannielle Fresquez

Dannielle Fresquez, an Employee of  
WOLF, RIFKIN, SHAPIRO,  
SCHULMAN & RABKIN, LLP