

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2 DEKKER/PERICH/SABATINI, LTD.,
3 NEVADA BY DESIGN, LLC d/b/a
4 NEVADA BY DESIGN, MELROY
5 ENGINEERING, INC. d/b/a MSA
6 ENGINEERING CONSULTANTS, JW
7 ZUNINO & ASSOCIATES, LLC, and
8 NINYO & MOORE,
9 GEOTECHNICAL CONSULTANTS,
10 RICHARDSON CONSTRUCTION,
11 INC.; AND THE GUARANTEE
12 COMPANY OF NORTH AMERICA
13 USA

14 Petitioners,

15 vs.

16 THE EIGHTH JUDICIAL DISTRICT
17 COURT OF THE STATE OF
18 NEVADA, IN AND FOR THE
19 COUNTY OF CLARK; AND THE
20 HONORABLE TREVOR ATKIN,

21 Respondents, and

22 CITY OF NORTH LAS VEGAS,

23 Real Party in Interest.

24 **RICHARDSON CONSTRUCTION, INC. AND THE GUARANTEE**
25 **COMPANY OF NORTH AMERICA USA'S NOTICE OF SERVICE OF**
26 **JOINDER TO JOINT PETITION FOR WRIT OF MANDAMUS OR,**
27 **ALTERNATIVELY, PROHIBITION**

28 Pursuant to this Court's August 24, 2020 Order, attached as Exhibit "A" please
find proof of service of Richardson Construction, In., and The Guarantee Company of

Electronically Filed
Aug 28 2020 03:35 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Case No.: 81459

**Lower Court Case No.: A-19-798346-
C**

1 North America USA's Joinder to Joint Petition for Writ of Mandamus or,
2 Alternatively, Prohibition.

3 DATED this 28th, of August, 2020.

4 **PARKER NELSON & ASSOCIATES, CHTD.**

5 
6
7 **THEODORE PARKER, ESQ.**

8 Nevada Bar No. 4716

9 **JENNIFER A. DELCARMEN, ESQ.**

10 Nevada Bar No. 12727

11 2460 Professional Court, Suite 200

12 Las Vegas, Nevada 89128

13 *Attorneys for Petitioners,*

14 *Richardson Construction, Inc. and*

15 *The Guarantee Company of North America USA*
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CERTIFICATE OF SERVICE

Pursuant to NRAP 25, I hereby certify that on this 28th, day of August, 2020, the foregoing **RICHARDSON CONSTRUCTION, INC. AND THE GUARANTEE COMPANY OF NORTH AMERICA USA'S JOINDER TO JOINT PETITION FOR WRIT OF MANDAMUS OR, ALTERNATIVELY, PROHIBITION**, were e-submitted to the Clerk of the Supreme Court of the State of Nevada and services were executed to the addresses shown below in the manner indicated:

Party	Attorney	E-Mail
Dekker/Perich/Sabatini. Ltd.	John T. Wendland, Esq. Jeremy R. Kilber, Esq. WEIL & DRAGE, APC 861 Coronado Center Drive, Suite 231 Henderson, NV 89052 (702) 314-1905 Fax: (702) 314-1909	jwendland@weildrage.com jkilber@weildrage.com
Melroy Engineering, Inc. d/b/a MSA Engineering Consultants	Jeremy R. Kilber, Esq. WEIL & DRAGE, APC 861 Coronado Center Drive, Suite 231 Henderson, NV 89052 (702) 314-1905 Fax: (702) 314-1909	jkilber@weildrage.com
JW Zunino & Associates	Dylan P. Todd, Esq. Lee H. Gorlin, Esq. FORAN GLENNON PALANDECH PONZI & RUDLOFF 2200 Paseo Verde Parkway, Suite 280 Henderson, NV 89052 (702) 827-1510 Fax: (312) 863-5099	dtodd@fgppr.com lgorlin@fgppr.com
Ninyo & Moore, Geotechnical Consultants	Jorge A. Ramirez, Esq. Jonathan C. Pattillo, Esq. WILSON ELSEER MOSKOWITZ EDELMAN & DICKER LLP 300 S. Fourth Street, 11th Floor Las Vegas, NV 89101-6014 (702) 727-1400 Fax: (702) 727-1401	Jorge.Ramirez@wilsonelser.com Jonathan.Pattillo@wilsonelser.com

Party	Attorney	E-Mail
City of North Las Vegas	Richard C. Gordon, Esq. Aleem A. Dhalla, Esq. SNELL & WILMER L.L.P. 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, NV 89169 (702) 784-5200 Fax: (702) 784-5252	<u>rgordon@swlaw.com</u> <u>adhalla@swlaw.com</u>

/s/Jeanne L. Calix
An employee of Parker, Nelson & Associates Chtd.

EXHIBIT “A”



1 **NOTC**
2 THEODORE PARKER, III, ESQ.
3 Nevada Bar No. 4716
4 JENNIFER DELCARMEN, ESQ.
5 Nevada Bar No. 12727
6 **PARKER, NELSON & ASSOCIATES, CHTD.**
7 2460 Professional Court, Suite 200
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9 Telephone: (702) 868-8000
10 Facsimile: (702) 868-8001
11 Email: tparker@pnalaw.net
12 *Attorneys for Defendant/Cross-Claimant/Third-Party*
13 *Plaintiff, Richardson Construction, Inc. and Defendant,*
14 *The Guarantee Company of North America USA*

15 **DISTRICT COURT**
16
17 **CLARK COUNTY, NEVADA**

18 CITY OF NORTH LAS VEGAS,
19
20 Plaintiff,

21 v.

22 DEKKER/PERICH/SABATINI LTD.;
23 RICHARDSON CONSTRUCTION, INC.;
24 NEVADA BY DESIGN, LLC D/B/A NEVADA
25 BY DESIGN ENGINEERING CONSULTANTS;
26 JW ZUNINO & ASSOCIATES, LLC; MELROY
27 ENGINEERING, INC. D/B/A MSA
28 ENGINEERING CONSULTANTS; O'CONNOR
CONSTRUCTION MANAGEMENT INC.;
NINYO & MOORE, GEOTECHNICAL
CONSULTANTS; JACKSON FAMILY
PARTNERSHIP LLC D/B/A STARGATE
PLUMBING; AVERY ATLANTIC, LLC; BIG C
LLC; RON HANLON MASONRY, LLC; THE
GUARANTEE COMPANY OF NORTH
AMERICA USA; P & W BONDS, LLC;
PAFFENBARGER & WALDEN, LLC; DOES I
through X, inclusive; and ROE CORPORATIONS
I through X, inclusive,

Defendants.

RICHARDSON CONSTRUCTION, INC.

Cross-Claimant,

v.

JACKSON FAMILY PARTNERSHIP LLC
D/B/A STARGATE PLUMBING; AVERY
ATLANTIC, LLC; BIG C LLC; RON HANLON
MASONRY, LLC; DOES I through X; ROE
CORPORATIONS I through X,

CASE NO. A-19-798346-C
DEPT. NO. VIII

**DEFENDANT/CROSS-
CLAIMANT/THIRD-PARTY
PLAINTIFF RICHARDSON
CONSTRUCTION, INC. AND
DEFENDANT THE GUARANTEE
COMPANY OF NORTH AMERICA
USA'S NOTICE OF FILING
JOINDER TO JOINT PETITION
FOR WRIT OF MANDAMUS OR,
ALTERNATIVELY, PROHIBITION**


1 Cross-Defendants,)
2)
3 RICHARDSON CONSTRUCTION, INC.,)
4 Third-Party Plaintiffs,)
5 v.)
6 AZTECH PLASTERING, LLC; BAZOOKA)
7 BUB, INC.; INSTANT JUNGLE LANDSCAPE,)
8 INC.; PRIME CONTRACTING, INC. D/B/A)
9 PRIME GRADING & PAVING; WESTERN)
10 SEALANTS, LLC; DOES XI through XX; ROE)
11 CORPORATIONS XI through XX,)
12 Third-Party Defendants.)
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**DEFENDANT/CROSS-CLAIMANT/THIRD-PARTY PLAINTIFF RICHARDSON
CONSTRUCTION, INC. AND THE GUARENTEE COMPANY OF NORTH AMERICA
USA'S NOTICE OF FILING JOINDER TO JOINT PETITION FOR WRIT OF
MANDAMUS OR, ALTERNATIVELY, PROHIBITION**

COMES NOW, Defendant/Cross-Claimant/Third-Party Defendant, RICHARDSON
CONSTRUCTION, INC. and Defendant, THE GUARANTEE COMPANY OF NORTH AMERICA
USA, (hereinafter collectively referred to as "Richardson Defendants"), by and through its attorney
of record, THEODORE PARKER, III, ESQ., hereby gives notice that on August 28, 2020, the
Richardson Defendants filed the attached Joinder to Joint Petition for Writ of Mandamus or,
Alternatively, Prohibition.

DATED this 28th, day of August, 2020.

PARKER, NELSON & ASSOCIATES, CHTD.



THEODORE PARKER, III, ESQ.
Nevada Bar No. 4716
JENNIFER DELCARMEN, ESQ.
Nevada Bar No. 12727
2460 Professional Court, Suite 200
Las Vegas, Nevada 89128
*Attorneys for Defendant/Cross-Claimant/Third-
Party Plaintiff, Richardson Construction, Inc. and
Defendant, The Guarantee Company of North
America USA*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of the Law Offices of PARKER, NELSON & ASSOCIATES, CHTD., and that on this 28th, day of August, 2020 and pursuant to NRCP 5(b), I served a true and correct copy of the foregoing **DEFENDANT/CROSS-CLAIMANT/THIRD-PARTY PLAINTIFF RICHARDSON CONSTRUCTION, INC. AND DEFENDANT THE GUARANTEE COMPANY OF NORTH AMERICA USA'S NOTICE OF FILING JOINDER TO JOINT PETITION FOR WRIT OF MANDAMUS OR, ALTERNATIVELY, PROHIBITION** on the party(s) set forth below by:

- ☐ Placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Las Vegas, NV, postage prepaid, following ordinary business practices.
- ☐ Facsimile transmission, pursuant to the amendment to the Eighth Judicial District Court Rule 7.26, by faxing a true and correct copy of the same to each party addressed as follows:
- ☐ By E-mail: by electronic mail delivering the document(s) listed above to the e-mail address(es) set forth below on this date before 5:00 p.m.
- ☒ By EFC: by electronic filing and service with the Court delivering the document(s) listed above via E-file & E-serve (Odyssey) filing system.

Party	Attorney	E-Mail
Plaintiff	Richard C. Gordon, Esq. Aleem A. Dhalla, Esq. SNELL & WILMER L.L.P. 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, NV 89169 (702) 784-5200 Fax: (702) 784-5252	rgordon@swlaw.com adhalla@swlaw.com
Defendant, Jackson Family Partnership LLC d/b/a Stargate Plumbing	Shannon G. Splaine, Esq. LINCOLN GUSTAFSON & CERCOS, LLP 3960 Howard Hughes Parkway, Suite 200 Las Vegas, NV 89169 (702) 257-1997 Fax: (702) 257-2203	ssplaine@lgclawoffice.com
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Party	Attorney	E-Mail
Defendant, Nevada by Design, LLC d/b/a Nevada by Design Engineering Consultants	John T. Wendland, Esq. Anthony D. Platt, Esq. WEIL & DRAGE, APC 861 Coronado Center Drive, Suite 231 Henderson, NV 89052 (702) 314-1905 Fax: (702) 314-1909	jwendland@weildrage.com aplatt@weildrage.com
Defendant, Dekker/Perich/Sabatini, Ltd.	John T. Wendland, Esq. Jeremy R. Kilber, Esq. WEIL & DRAGE, APC 861 Coronado Center Drive, Suite 231 Henderson, NV 89052 (702) 314-1905 Fax: (702) 314-1909	jwendland@weildrage.com jkilber@weildrage.com
Defendant, Melroy Engineering, Inc. d/b/a MSA Engineering Consultants	Jeremy R. Kilber, Esq. WEIL & DRAGE, APC 861 Coronado Center Drive, Suite 231 Henderson, NV 89052 (702) 314-1905 Fax: (702) 314-1909	jkilber@weildrage.com
Defendant, Ninyo & Moore, Geotechnical Consultants	Jorge A. Ramirez, Esq. Jonathan C. Pattillo, Esq. WILSON ELSEER MOSKOWITZ EDELMAN & DICKER LLP 300 S. Fourth Street, 11th Floor Las Vegas, NV 89101-6014 (702) 727-1400 Fax: (702) 727-1401	Jorge.Ramirez@wilsonelser.com Jonathan.Pattillo@wilsonelser.com
Defendants, P & W Bonds, LLC and Paffenbarger & Walden, LLC	Charles W. Bennion, Esq. ELLSWORTH & BENNION, CHTD. 777 N. Rainbow Blvd., Suite 270 Las Vegas, NV 89107 (702) 658-6100 Fax: (702) 658-2502	charles@silverstatelaw.com
	Patrick F. Welch, Esq. JENNINGS STROUSS & SALMON, PLC One East Washington Street, Suite 1900 Phoenix, AZ 85004-2554 (602) 262-5847 Fax: (602) 495-2781	pwelch@jsslaw.com

Party	Attorney	E-Mail
Defendants, JW Zunino & Associates	Dylan P. Todd, Esq. Lee H. Gorlin, Esq. FORAN GLENNON PALANDECH PONZI & RUDLOFF 2200 Paseo Verde Parkway, Suite 280 Henderson, NV 89052 (702) 827-1510 Fax: (312) 863-5099	dtodd@fgppr.com lgorlin@fgppr.com

/s/Jeanne L. Calix
An employee of PARKER, NELSON & ASSOCIATES CHTD.

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2 DEKKER/PERICH/SABATINI, LTD.,
3 NEVADA BY DESIGN, LLC d/b/a
4 NEVADA BY DESIGN, MELROY
5 ENGINEERING, INC. d/b/a MSA
6 ENGINEERING CONSULTANTS, JW
7 ZUNINO & ASSOCIATES, LLC, and
8 NINYO & MOORE,
9 GEOTECHNICAL CONSULTANTS,
10 RICHARDSON CONSTRUCTION,
11 INC.; AND THE GUARANTEE
12 COMPANY OF NORTH AMERICA
13 USA

14 Petitioners,

15 vs.

16 THE EIGHTH JUDICIAL DISTRICT
17 COURT OF THE STATE OF
18 NEVADA, IN AND FOR THE
19 COUNTY OF CLARK; AND THE
20 HONORABLE TREVOR ATKIN,

21 Respondents, and

22 CITY OF NORTH LAS VEGAS,

23 Real Party in Interest.

24 **RICHARDSON CONSTRUCTION, INC. AND THE GUARANTEE**
25 **COMPANY OF NORTH AMERICA USA'S JOINDER TO JOINT PETITION**
26 **FOR WRIT OF MANDAMUS OR, ALTERNATIVELY, PROHIBITION**

27 PARKER NELSON & ASSOCIATES, CHTD.

28 _____
 THEODORE PARKER, ESQ.

 Nevada Bar No. 4716

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 2460 Professional Court, Suite 200

 Las Vegas, Nevada 89128

 Attorneys for Petitioners,

 Richardson Construction, Inc. and

 The Guarantee Company of North America USA

Case No.: 81459

Lower Court Case No. C

Electronically Filed

Aug. 28, 2020 11:08 a.m.

Elizabeth A. Brown

Clerk of Supreme Court

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COUNTY OF CLARK)

and says that:

COMPANY OF NORTH AMERICA USA.

requirements of Rule 21(d).

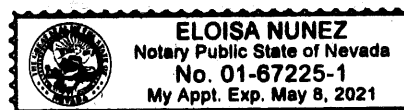
believe them to be true.

///

1 4. I declare under penalty of perjury under the laws of the State of Nevada
2 that the forgoing is true and correct.

3
4 
5 THEODORE PARKER, III, ESQ.

6 SUBSCRIBED and SWORN to before me
7 this 28th day of August, 2020.



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11 NOTARY PUBLIC in and for
12 said County and State

NRAP 26.1 DISCLOSURE

RICHARDSON CONSTRUCTION, INC., by and through its counsel of record, Parker, Nelson & Associates, Chtd., hereby certifies that RICHARDSON CONSTRUCTION, INC. is not publicly traded, nor is ten percent of it or more owned by a publicly traded company.

THE GUARANTEE COMPANY OF NORTH AMERICA USA was acquired by Intact Financial Corporation and is a wholly owned by Intact Financial Corporation, which is a publicly traded corporation.

Both RICHARDSON CONSTRUCTION, INC. and THE GUARANTEE COMPANY OF NORTH AMERICA USA are represented in the district court and in this Court by the law firm Parker, Nelson & Associates.

DATED 26th day of August, 2020.

PARKER NELSON & ASSOCIATES, CHTD.


THEODORE PARKER, ESQ.

Nevada Bar No. 4716

JENNIFER A. DELCARMEN, ESQ.

Nevada Bar No. 12727

2460 Professional Court, Suite 200

Las Vegas, Nevada 89128

Attorneys for Petitioners,

Richardson Construction, Inc. and

The Guarantee Company of North America USA

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ROUTING STATEMENT

The Nevada Supreme Court has original jurisdiction regarding writ petitions. This writ petition should be retained by the Nevada Supreme Court. See Segovia v. Eighth Judicial Dist. Court, 407 P.3d 783, 785, 133 Nev. Adv. Rep. 112 (2017). Further, the Petition and this Joinder should be retained by the Nevada Supreme Court because it raises a question of “statewide public importance” and is an issue of first impression. NRAP 17(a)(11)(12).

I.

INTRODUCTION AND RELIEF SOUGHT

RICHARDSON CONSTRUCTION, INC. (hereinafter “Richardson”) and THE GUARANTEE COMPANY OF NORTH AMERICA (hereinafter “GCNA”) join in the introduction and relief sought by Petitioners, as contained within the Writ filed on August 18, 2020, on the basis of the statute of repose, as though fully set forth herein. Richardson and GCNA seek a directive to the district court to vacate the order granting the CITY OF NORTH LAS VEGAS’ (hereinafter “CNLV”) motion to alter judgment and to re-affirm the district court’s prior order dismissing the action.

Richardson and GCNA take no position on the substantive basis contained within the Joint Writ in regards to NRS 11.258. However, this Court should be aware that Richardson relied on the designs and specifications provided by the original Joint Petitioners in constructing the fire station.

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II.

ISSUES PRESENTED FOR REVIEW

Richardson and GCNA join in the first two issues as presented in the Joint Petition.

III.

SUMMARY OF FACTS AND PROCEDURAL HISTORY

Richardson and GCNA join in the facts as presented in the Joint Petition as though fully stated herein, on the same pertain to issues surrounding the statute of repose. Again, Richardson and GCNA take no position, and do not join in, the facts as presented in regards to NRS 11.258. In addition, Richardson and GCNA present the below additional, pertinent facts.

The applicable statute of repose, when the City filed its Complaint, was six years. The City filed its Complaint on July 11, 2019, well after the expiration of the six-year statute of repose. (PET.APP000001-000017.) As such, once served, Richardson and GCNA filed a motion to dismiss based on the statute of repose. (RCI00001-RCI00006). Richardson and GCNA's motion to dismiss was based on similar grounds as the motion to dismiss filed by Petitioner, NEVADA BY DESIGN, LLC d/b/a NEVADA BY DESIGN (hereinafter "NBD").¹ (Compare Id. to PET.APP. 000648-000663.) Plaintiff opposed Richardson and GCNA's motion. (RCI00007-RCI00013.) On September 23, 2019, Richardson and GCNA filed their reply in

¹NBD's motion to dismiss was also based in part on NRS 11.258. Richardson and GCNA's motion to dismiss was solely based on the statute of repose.

1 support of their motion to dismiss. (RCI00014-RCI00021.) Richardson and GCNA
2 also joined NBD's motion to dismiss, in regards to NRS 11.202. (RCI00022-
3 RCI00026.)

4
5 The hearing on NBD's motion to dismiss occurred before the hearing on
6 Richardson and GCNA's motion to dismiss. (PET.APP.002399-002406.) NBD's
7 Motion was granted. (Id.) Richardson and GCNA's motion to dismiss was deemed
8 moot. (PET.APP.002405.)
9

10 In response, CITY filed a motion to alter judgment. (PET.APP.002407-
11 002421.) Multiple parties filed oppositions. Richardson and GCNA filed an
12 opposition and joined the opposition of NBD. (PET.APP.002694-002887.) Following
13 completion of briefing, the district court ruled that the revised statute of repose could
14 be utilized to revive the City's stale claims. (PET.APP.003064-003067.)
15
16

17 IV.

18 **STATEMENT OF REASONS WHY THE WRIT SHOULD ISSUE**

19 Richardson and GCNA join in the factual and legal arguments presented by the
20 Joint Petition to issue a writ in regards to the proper application and ruling regarding
21 NRS 11.202 as though fully set forth herein. The issue raised is strictly a question of
22 law as there are no factual disputes at issue. Richardson and GCNA, as well as all
23 other professionals, persons, or entities, who performed work on the fire station at
24 issue obtained a vested property right at the expiration of the six-year statute of
25 repose. Richardson and GCNA have now been deprived of this fundamental property
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1 right by the district court's retroactive application of the recently amended NRS
2 11.202 to revive a the CITY's stale claims.

3 Moreover, as aptly argued, the CITY's motion to amend should never have
4 been granted. NRCP 3 provides that [a] civil action is commenced by filing a
5 complaint with the Court." NRS 11.202, both the prior and newly amended version,
6 provide "no action shall be commenced...", with the difference between the statutes
7 being one provided a six-year statute of repose, and the amended version a ten-year
8 limitation. This means that the CITY's Complaint, filed on July 11, 2019, past the
9 then applicable six-year statute of repose never "commenced". As the CITY's
10 untimely complaint was barred from commencing, it is properly considered void ab
11 initio. A complaint that is void ab initio "has no force and effect, does not legally
12 exist, and therefore, cannot be amended" nor should it be revived by the district court.
13 See generally, S. Nev. Adult Mental Health Servs. V. Eighth Jud. Dist. Crt., 132 Nev.
14 1031 (2016). Thus, the original complaint cannot be brought back to life by the
15 district court.
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V.

CONCLUSION

For the reasons stated herein, which includes incorporation of the arguments contained within the Joint Petition, Richardson and GCNA respectfully request this Court grant the Petition for a Writ of Mandamus, or Alternatively, Prohibition, and provide the relief requested herein.

DATED 28th, day of August, 2020.

PARKER NELSON & ASSOCIATES, CHTD.

THEODORE PARKER, ESQ.

Nevada Bar No. 4716

JENNIFER A. DELCARMEN, ESQ.

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2460 Professional Court, Suite 200

Las Vegas, Nevada 89128

Attorneys for Real Parties in Interest

Richardson Construction, Inc. and

The Guarantee Company of North America USA

1
2 **CERTIFICATE OF COMPLIANCE**

- 3 1. I hereby certify that this brief complies with the formatting requirements of
4 NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type
5 style requirements of NRAP 32(a)(6) because this brief has been prepared in
6 a proportionally spaced typeface using Word version in 14 point Times New
7 Roman type style.
8
9
10 2. I hereby certify that this brief complies with the page and volume type
11 requirements of NRAP 32(a)(7) as the brief is 5 pages long and contains 885
12 words.
13
14 3. I hereby certify that I have read this brief, and to the best of my knowledge,
15 information, and belief, it is not frivolous or interposed for any improper
16 purpose. I further certify that this answer complies with all applicable
17 Nevada Rules of appellate procedure, in particular NRAP 28(e)(1), which
18 requires every assertion in a brief regarding matters in the record to be
19 supported by appropriate references to page and volume number, if any, of
20 the transcript or appendix where the matter relied on is
21
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26 ///

1 to be found. I understand that I may be subject to sanctions in the event that the
2 accompanying answer is not in conformity with the requirements of the Nevada
3 Rules of Appellate Procedure.
4

5 DATED this 28th, day of August, 2020.

6 **PARKER NELSON & ASSOCIATES,**
7 **CHTD.**

8 

9 **THEODORE PARKER, ESQ.**

10 Nevada Bar No. 4716

11 **JENNIFER A. DELCARMEN, ESQ.**

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13 2460 Professional Court, Suite 200

14 Las Vegas, Nevada 89128

15 *Attorneys for Real Parties in Interest*

16 *Richardson Construction, Inc. and*

17 *The Guarantee Company of North America*

18 *USA*
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CERTIFICATE OF SERVICE

Pursuant to NRAP 25, I hereby certify that on this 28th, day of August, 2020, the foregoing **RICHARDSON CONSTRUCTION, INC. AND THE GUARANTEE COMPANY OF NORTH AMERICA USA'S JOINDER TO JOINT PETITION FOR WRIT OF MANDAMUS OR, ALTERNATIVELY, PROHIBITION**, were e-submitted to the Clerk of the Supreme Court of the State of Nevada and services were executed to the addresses shown below in the manner indicated:

X By EFC: by electronic filing and service with the Court delivering the document(s) listed above via E-file & E-serve (Odyssey) filing system.

Party	Attorney	E-Mail
Dekker/Perich/Sabatini . Ltd.	John T. Wendland, Esq. Jeremy R. Kilber, Esq. WEIL & DRAGE, APC 861 Coronado Center Drive, Suite 231 Henderson, NV 89052 (702) 314-1905 Fax: (702) 314-1909	jwendland@weildrage.com jkilber@weildrage.com
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Party	Attorney	E-Mail
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Trial Court Judge	<i>VIA E-MAIL ONLY:</i> The Honorable Judge Trevor Atkin Eighth Judicial District Court, Department No. 8 Phoenix Building Courtroom 11th Floor 110330 S. 3rd Street Las Vegas, NV 89101	Dept08lc@clarkcountycourts.us . LernerL@clarkcountycourts.us

/s/Jeanne L. Calix

An employee of Parker, Nelson & Associates Chtd.