

**Case No. 81474**

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IN THE SUPREME COURT OF  
THE STATE OF NEVADA

Electronically Filed  
Nov 12 2020 06:51 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

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CITY OF HENDERSON, a Political Subdivision of the State of Nevada

Petitioner,

vs.

EIGHTH JUDICIAL DISTRICT COURT of the State of Nevada, in and for the  
County of Clark, and the Honorable Timothy C. Williams, District Court Judge

Respondents

and

SOLID STATE PROPERTIES, LLC., a Nevada Limited Liability Company,

Real Party in Interest

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District Court Case No. A-19-788817-B  
Eighth Judicial District Court of Nevada

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**SUPPLEMENT TO PETITION FOR WRIT OF MANDAMUS**  
**PURSUANT TO NRAP 21(a)**

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HENDERSON CITY  
ATTORNEY'S OFFICE  
Nicholas G. Vaskov (#8298)  
Wade P. Gochnour (#6314)  
Brandon P. Kemble (#11175)  
240 Water Street, MSC 144  
Henderson, NV 89015

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*Attorneys for* CITY OF HENDERSON

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**November 12, 2020**

The City of Henderson hereby files this Supplement to its Petition for Writ of Mandamus to include the following documents pursuant to NRAP 21(a):

1. Proof of service of the City of Henderson's Petition for Writ of Mandamus upon the Honorable Timothy C. Williams, District Court Judge, Eighth Judicial District Court, Department 16.

2. Notice of Filing of Petition for Writ of Mandamus.

3. Service of courtesy copies of Solid State Properties, LLC's Answer to Petition for Writ of Mandamus, and City of Henderson's Reply in Support of Petition for Writ of Mandamus, upon the Honorable Timothy C. Williams, District Court Judge, Eighth Judicial District Court, Department 16.

DATED this November 12, 2020.

CITY OF HENDERSON

BY: /s/ Brandon P. Kemble  
Nicholas G. Vaskov (#8298)  
City Attorney  
Wade B. Gochmour (#6314)  
Assistant City Attorney  
Brandon P. Kemble (#11175)  
Assistant City Attorney  
240 Water Street, MSC 144  
Henderson, NV 89015

Attorneys for Petitioner  
*City of Henderson*

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of the Henderson City Attorney's Office, and that on November 12, 2020, a copy of the foregoing Supplement to Petition for Writ of Mandamus Pursuant to NRAP 21(a) was electronically filed with the Clerk of the Court for the Nevada Supreme Court by using the Nevada Supreme Court's E-Filing system (E-Flex). Participants in the case who are registered with E-Flex as users will be served by the E-Flex system and others not registered will be served via electronic mail as follows:

Brian C. Whitaker, Esq. (bwhitaker@ericksonwhitaker.com)  
Ryan B. Davis, Esq. (rdavis@ericksonwhitaker.com)  
ERICKSON & WHITAKER PC  
1349 Galleria Drive, Suite 200  
Henderson, NV 89014

Attorneys for Respondent  
*SOLID STATE PROPERTIES LLC.*

/s/ Cheryl Boyd  
An employee of the  
Henderson City Attorney's Office

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**From:** Berkheimer, Lynn <Berkheimerl@clarkcountycourts.us>  
**Sent:** Thursday, November 12, 2020 8:51 AM  
**To:** Cheryl Boyd <Cheryl.Boyd@cityofhenderson.com>  
**Subject:** RE: Solid State Properties LLC v. City of Henderson, A-19-788817-B

**EXTERNAL EMAIL – USE CAUTION**

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I have received the zip file consisting of 381 pages. Thank you

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**From:** Cheryl Boyd  
**Sent:** Monday, November 9, 2020 12:34 PM  
**To:** [Dept16EA@clarkcountycourts.us](mailto:Dept16EA@clarkcountycourts.us)  
**Subject:** Solid State Properties LLC v. City of Henderson, A-19-788817-B

Lynn:

The City has Writ of Mandamus documents that were filed with the NV Supreme Court and which have to be served upon Judge Williams. Please advise by what method service should be effectuated: by direct service with Legal Wings; by email; through USPS; through Odyssey using the District Court Case Number or other method.

Please advise by responsive email or feel free to call me at (702) 267-1231.

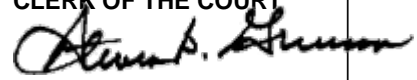
Thank you.

**Cheryl Boyd | Senior Legal Assistant**  
**x. 1231/MSC 144**

Legal Assistant to Assistant City Attorneys: [Brandon P. Kemble](#) | [Brian R. Reeve](#)



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**NOTC**  
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Attorneys for Defendant  
City of Henderson

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

Solid State Properties LLC, a Nevada Limited  
Liability Company,

Plaintiff,

v.

CITY OF HENDERSON, a Municipality,

Defendant.

CASE NO.: A-19-788817-B

DEPT NO.: XVI

**DEFENDANT CITY OF HENDERSON'S NOTICE OF FILING OF**  
**PETITION FOR WRIT OF MANDAMUS**

Notwithstanding the fact that Solid State Properties, LLC and the City of Henderson are the only parties to this case; notwithstanding the parties' Stipulation to Stay Case Pending Resolution of Writ Proceedings filed on July 22, 2020; and notwithstanding the fact that Solid State Properties, LLC has filed its Answer to the City's Petition for Writ of Mandamus, the City of Henderson files this Notice of Filing of Petition for Writ of Mandamus (pursuant to NRAP 21(a)(1)), which was filed on

July 16, 2020, Nevada Supreme Court Case No. 81474. The Petition for Writ of Mandamus was served separately on the District Court and on Solid State Properties, LLC.

DATED this November 12, 2020.

BY: /s/ Brandon P. Kemble  
Brandon P. Kemble  
Nevada Bar No. 11175  
240 Water Street, MSC 144  
Henderson, NV 89015

Attorney for Defendant  
City of Henderson

**CERTIFICATE OF SERVICE**

On November 12, 2020, a true and correct copy of the above and foregoing DEFENDANT CITY OF HENDERSON'S NOTICE OF FILING OF PETITION FOR WRIT OF MANDAMUS was served to the following party via E-Service through EJDC E-Filing (Odyssey); and that the date and time of the electronic service is in place and instead of service by U.S. Mail.

Brian C. Whitaker, Esq. (bwhitaker@ericksonwhitaker.com)  
Ryan B. Davis, Esq. (rdavis@ericksonwhitaker.com)  
ERICKSON & WHITAKER PC

Attorneys for Plaintiff  
SOLID STATE PROPERTIES LLC.

/s/ Cheryl Boyd  
An employee of the  
City of Henderson

**From:** [Cheryl Boyd](#)  
**To:** [Dept16EA@clarkcountycourts.us](mailto:Dept16EA@clarkcountycourts.us)  
**Subject:** Nevada Supreme Court Case No. 81474 (District Court Case No. A-19-788817-B) - Courtesy Copies [COHCAO-LEGAL.FID70328]  
**Date:** Thursday, November 12, 2020 6:07:16 PM  
**Attachments:** [Solid State's Answering Brief - Filed Oct 15 2020.pdf](#)  
[Reply in Support of Petition for Writ of Mandamus - Filed Nov 12 2020.pdf](#)

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Lynn:

Attached are courtesy copies of the following documents in Nevada Supreme Court Case No. 81474 (District Court Case No. A-19-788817-B):

1. Solid State Properties, LLC's Answer to Petition for Writ of Mandamus, filed October 15, 2020; and
2. City of Henderson's Reply in Support of Petition for Writ of Mandamus, November 12, 2020.

**Cheryl Boyd | Senior Legal Assistant**  
240 Water St., MSC 144  
Henderson, NV 89015  
Mon – Thurs, 7:30 a.m. – 5:30 p.m.  
**(702) 267-1231**  
[cheryl.boyd@cityofhenderson.com](mailto:cheryl.boyd@cityofhenderson.com)

Legal Assistant to Assistant City Attorneys: Brandon P. Kemble | Brian R. Reeve



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