

IN THE SUPREME COURT OF THE STATE OF NEVADA
OFFICE OF THE CLERK

JOHN ILIESCU, JR.;
SONNIA ILIESCU, TRUSTEES OF
THE JOHN ILIESCU JR. AND
SONNIA ILIESCU 1992 FAMILY
TRUST AGREEMENT, DATED
JANUARY 24, 1992,

Appellants,

vs.

THE REGIONAL TRANSPORTATION
COMMISSION OF WASHOE
COUNTY, A SPECIAL PURPOSE
UNIT OF THE GOVERNMENT,

Respondent.

Supreme Court No. 81753
District Court Case No. CV1900753
Electronically Filed
Oct 08 2020 01:07 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

RESPONDENT'S RESPONSE TO APPELLANTS'
DOCKETING STATEMENT

Pursuant to NRAP 14(f), Respondent, The Regional Transportation Commission of Washoe County ("Respondent"), hereby responds to the Docketing Statement of Appellants, John Iliescu, Jr.; Sonia Iliescu, Trustees of the John Iliescu Jr., and Sonia Iliescu 1992 Family Trust Agreement, Dated January 23, 1992, (collectively "Appellants").

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Respondent strongly disagrees with Appellants' statement of the case at pages 3-4. Specifically, Respondent disagrees that it "calculated a new deadline," made any "incorrect representation" to the district court, or that the district court relied upon any "incorrect calculation of days." Appellants never moved for an extension of the expert deadline, but made a request in their opposition to the motion in limine that they be granted "a 45-day extension of time in which to disclose their expert and submit his report in this case." The expert disclosure deadline was February 7, 2020, forty-five days after which was March 23, 2020. On March 27, 2020, Respondent notified the district court that no expert disclosure had been made by the requested extended deadline. This was an accurate statement and by no means did RTC "calculate a new deadline." Had Appellants believed this at the time, they should have filed a response in the nearly two months that followed prior to the district court entering its order on the motion in limine. As the district court pointed out in its

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May 14, 2020 order, Appellants had not filed anything since March 2, 2020.

Dated: October 8, 2020.

WOODBURN AND WEDGE

By: /s/ Dane W. Anderson
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The Regional Transportation
Commission of Washoe County, a
Special Purpose Unit of the
Government*

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Woodburn and Wedge, and that on the 8th day of October, 2020, a copy of the foregoing document(s) were 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 this 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 U.S. mail as follows:

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Settlement Judge

Dated: October 8, 2020.

/s/ Dianne M. Kelling
An employee of Woodburn and Wedge