

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

IN RE: D.O.T. LITIGATION

TGIG, LLC; NEVADA HOLISTIC MEDICINE, LLC; GBS NEVADA PARTNERS, LLC; FIDELIS HOLDINGS, LLC; GRAVITAS NEVADA, LLC; NEVADA PURE, LLC; MEDIFARM, LLC; MEDIFARM IV LLC; THC NEVADA, LLC; HERBAL CHOICE, INC.; RED EARTH LLC; NEVCANN LLC; GREEN THERAPEUTICS LLC; AND GREEN LEAF FARMS HOLDINGS, LLC,

Appellants,

vs.

THE STATE OF NEVADA  
DEPARTMENT OF TAXATION,

Respondent.

Electronically Filed  
Jan 12 2022 03:55 p.m.  
Supreme Court No. 82014  
Elizabeth A. Brown  
Clerk of Supreme Court

**RESPONDENT LONE MOUNTAIN PARTNERS, LLC'S JOINDER  
IN RESPONDENT THE STATE OF NEVADA DEPARTMENT OF  
TAXATION'S UNOPPOSED MOTION TO EXTEND TIME  
TO FILE ANSWERING BRIEFS**

Respondent Lone Mountain Partners, LLC ("Lone Mountain"), by and through counsel undersigned, hereby files this Joinder to the legal arguments and authority contained in Respondent State of Nevada Department of Taxation ("DOT")'s Unopposed Motion to Extend Time to File Answering Briefs ("Unopposed Motion") filed on January 7, 2022.

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Lone Mountain incorporates herein, and on its behalf, the arguments made in the Unopposed Motion. Further, Lone Mountain joins in the DOT's request for a 60-day extension of the answering brief deadline for all respondents for the following additional reasons:

1. Lone Mountain should have been identified as a respondent in this appeal all along. As noted in the opening briefs, several parties (including Lone Mountain) intervened in the district court, participated in the proceedings, and were named by various appellants as party defendants in their complaints. *See, e.g.*, TGIG OB at 7 (“ . . . Appellants ultimately filed their operative Second Amended Complaint on or about November 26, 2019, naming the DoT and the intervening successful Applicants as party defendants”). Lone Mountain was one such “intervening successful Applicant” identified in TGIG's amended complaint. Moreover, Lone Mountain participated in the district court proceedings with the appellants and should likewise be afforded the opportunity to participate in this appeal to protect its interests.

2. Lone Mountain intends to file an answering brief addressing the three separate opening briefs filed by the three different groups of appellants—*i.e.*, the TGIG appellants, the THC appellants, and the Green Therapeutics appellants—including, without limitation, the arguments raised in the opening briefs that expressly reference and impact Lone Mountain. *See, e.g.*, TGIG OB at 42

(identifying Lone Mountain as a Tier 3 applicant); THC OB at 30 (same). Lone Mountain requires sufficient time to evaluate the multitude of arguments raised in appellants' three separate opening briefs and prepare an answering brief in response to same.

Dated this 12th day of January 2022.

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### **CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of January 2022, I submitted the foregoing NOTICE OF APPEARANCE OF COUNSEL OF RECORD FOR RESPONDENT LONE MOUNTAIN PARTNERS, LLC for filing and service via the Court's eFlex electronic filing system.



An employee of HONE LAW