

IN THE SUPREME COURT OF THE STATE OF NEVADA

VALLEY HEALTH SYSTEM, LLC
(doing business as "Centennial Hills
Hospital Medical Center"), a foreign
limited liability company,

Petitioner,

vs.

EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, ex rel. THE COUNTY OF
CLARK, AND THE HONORABLE
JUDGE JERRY A. WIESE II,

Respondent,

and

ESTATE OF REBECCA POWELL,
through BRIAN POWELL, as Special
Administrator; DARCI CREECY,
individually and as Heir; TARYN
CREECY, individually and as an Heir;
ISAIAH KHOSROF, individually and
as an Heir; LLOYD CREECY,
individually,

Real Parties In Interest,
And

DR. DIONICE S. JULIANO, M.D., an
individual; DR. CONRADO C.D.
CONCIO, M.D., an individual; DR.
VISHAL S. SHAH, M.D., an individual,

Additional Parties in Interest.

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Mar 30 2021 03:08 p.m.
Elizabeth A. Brown
Clerk of Supreme Court
Supreme Court Case No.: 82250

District Court Case No.: A-19-788787-C

Petition for Writ of Mandamus from Eighth Judicial District Court, Clark County
The Honorable Jerry A. Wiese II, District Judge
District Court Case No. A-19-A788787-C

**REAL PARTIES IN INTEREST DIONICE S. JULIANO, M.D., CONRADO
CONCIO, M.D., AND VISHAL SHAH, M.D.'S NOTICE OF NON-
OPPOSITION TO PETITIONER VALLEY HEALTH SYSTEM,
LLC'S APPLICATION FOR WRIT OF MANDAMUS AND MOTION
TO JOIN PETITION FOR WRIT OF MANDAMUS**

JOHN H. COTTON, ESQ.

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*Dionice Juliano, M.D., Conrado Concio, M.D.,
and Vishal Shah, M.D.*

NRAP 26.1 DISCLOSURE

The undersigned counsel of record certifies that the following are persons and entities as described in NRAP 26.1(a), and must be disclosed. These representations are made in order that the judges of this court may evaluate possible disqualification or recusal.

1. Real parties in interest Dionice Juliano, MD, Conrado Concio, MD, and Vishal Shah, MD, are natural persons and not corporations, and therefore no disclosure pursuant to NRAP 26.1 is required.

2. Respondents' counsel is the only law firm that has appeared for Respondents in this matter and who are expected to appear in this matter for Respondents.

Dated this 30th day of March 2021.

JOHN H. COTTON & ASSOCIATES

By: /s/ Brad Shipley

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*Dionice Juliano, M.D., Conrado Concio,
M.D., and Vishal Shah, M.D.*

TABLE OF CONTENTS

I.	Notice of non-opposition and motion to join petition for writ of mandamus.....	1
----	--	---

TABLE OF AUTHORITIES

Statutes:

NRS 41A.097.....	1
------------------	---

**I. NOTICE OF NON-OPPOSITION AND MOTION TO JOIN
PETITION FOR WRIT OF MANDAMUS**

Pursuant to this Court's order dated March 8, 2021, real parties in interest Dionice Juliano, M.D., ("Dr. Juliano") Conrado Concio, M.D., ("Dr. Concio") and Vishal Shah, M.D., ("Dr. Shah") have been ordered to respond to the petition. In response to the petition, Dr. Juliano, Dr. Concio and Dr. Shah each hereby give notice that they have no opposition to the petition for writ of mandamus, and pursuant to NRS 41A.071, each hereby submits that the arguments set forth in the petition apply equally to them, and they therefore request to join the petition, incorporating by reference each of the points and authorities set forth in Petitioner Valley Health System, LLC's Petition for Writ of Mandamus as if fully set forth herein.

Dated this 30th day of March, 2021.

**JOHN H. COTTON & ASSOCIATES,
LTD**

By: /s/ Brad Shipley

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Attorneys for Respondents

NRAP 32(a)(9)(A)-(C) CERTIFICATE OF COMPLIANCE

1. I hereby certify that this brief complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6) because this brief has been prepared in a proportionally spaced typeface using Microsoft Word in 14-point Times New Roman font.

2. I further certify that this brief complies with the page- or type-volume limitations of NRAP 32(a)(7)(A) because, excluding the parts of the brief exempted by NRAP 32(a)(7)(C), it does not exceed 30 pages and contains less than 14,000 words.

3. Finally, I hereby certify that I have read this brief, and to the best of my knowledge, information and belief, it is not frivolous or interposed for any improper purpose. I further certify that this brief complies with all applicable Nevada Rules of Appellate Procedure, in particular NRAP 28(e)(1), which requires every assertion in the brief regarding matters in the record to be supported by a reference to the page and volume number, if any, of the transcript or appendix where the matter relied on is to be found. I understand that I may be subject to sanctions in the event that the accompanying brief is not in conformity with the requirements of the Nevada Rules of Appellate Procedure.

///

4. I affix my signature to this brief pursuant to NRCP 32(c)(2)(d).

Dated this 30th day of March 2021.

JOHN H. COTTON & ASSOCIATES, LTD.

By: /s/ John H. Cotton

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Dionice Juliano, M.D., Conrado Concio,

M.D., and Vishal Shah, M.D.

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of March 2021, I served the foregoing **REAL PARTIES IN INTEREST DIONICE S. JULIANO, M.D., CONRADO CONCIO, M.D., AND VISHAL SHAH, M.D.'S NOTICE OF NON-OPPOSITION TO PETITIONER VALLEY HEALTH SYSTEM, LLC'S APPLICATION FOR WRIT OF MANDAMUS AND MOTION TO JOIN PETITION FOR WRIT OF MANDAMUS** upon the following parties by electronically filing with the Clerk of the Court and serving all parties with an email address on record as follows:

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