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IN THE SUPREME COURT OF THE STATE OF NEVADA

ALI KIA, M.D., and NEVADA
HOSPITALIST GROUP, LLP,

Supreme Court No: 83357

Petitioners,
v.

District Court No.: A-17-757722-C

EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, IN AND FOR THE
COUNTY OF CLARK, AND THE
HONORABLE JASMIN-LILLY-
SPELLS,

Respondents,
and

CHLOE GREEN, FRANK J. DELEE,
M.D., FRANK J. DELEE, P.C., and
SUNRISE HOSPITAL AND MEDICAL
CENTER, LLC.

**REAL PARTY IN INTEREST FRANK J. DELEE, M.D. AND FRANK J.
DELEE, M.D., PC'S MOTION FOR LEAVE TO JOIN RESPONDENT
CHLOE GREEN'S ANSWER TO ALI KIA, M.D.'S PETITION FOR
WRIT OF MANDAMUS**

Real Parties in Interest Frank J. DeLee, M.D. and Frank J. DeLee M.D., P.C.
(collectively "DeLee Parties"), by and through their attorneys of record, Eric K.
Stryker of the law firm of Wilson, Elser, Moskowitz, Edelman & Dicker, LLP,

pursuant to Nevada Rule of Appellate Procedure 21(b)(2) and 27(a)(1), respectfully move this Court for leave to join Respondent Choloe Green's Answering Brief to Petitioner Ali Kia's Petition for Writ of Mandamus.

This Motion is made and based upon the papers and pleadings on file herein, the Memorandum of Points and Authorities submitted with Respondent Choloe Green's Answering Brief to Petitioner Ali Kia's Petition for Writ of Mandamus and supplemental exhibit appendix, and any other evidence filed by any party or presented at any oral argument of this matter.

With respect to the DeLee Parties, good cause exists for granting leave to allow them to join as a Respondent because it would aid in judicial economy. The issues and defenses raised by Respondent Choloe Green's Answer to Dr. Kia's Writ of Mandamus apply equally to Real Party of Interest the DeLee Parties. The DeLee Parties had filed a limited joinder to Respondent Choloe Green's opposition to Petitioner Dr. Kia's motion for reconsideration. *See* Supplemental Exhibit Appendix.

The DeLee Parties' interests in the subjects of the instant Writ proceedings are substantially aligned with those of Respondent Choloe Green. Therefore a separate Answer to the Writ of Mandamus from this moving party would not materially assist the Court in its disposition of these issues. Petitioners will not be prejudiced if the DeLee Parties are permitted to join in Respondent's Answer.

Accordingly, it is respectfully requested that this Court grant the DeLee Parties' Motion for Leave to Join Respondent Choloe Green's Answering Brief to Petitioner Ali Kia's Petition for Writ of Mandamus pursuant to NRAP 21(b)(2).

If this Motion is granted, the DeLee Parties will submit a check for \$500.00 for the filing fee, as set forth in NRAP 21(g).

Dated this 29th day of December, 2021.

WILSON, ELSE, MOSKOWITZ,
EDELMAN & DICKER LLP

By: /s/ Eric K. Stryker
ERIC K. STRYKER, ESQ.
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*Attorneys for Real Party in Interest
Frank J. DeLee, M.D. and Frank J.
DeLee M.D., P.C.*

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

1. I am an attorney of record for Real Party in Interest Frank J. DeLee, M.D.
and Frank J. DeLee M.D., P.C. and make this Affidavit pursuant to NRAP
21(a)(5).

3. The contents of the foregoing Motion for Leave are true and based upon my personal knowledge, except as to those matters stated on information and belief.

/s/ Eric K. Stryker
ERIC K. STRYKER, ESQ.

CERTIFICATE OF COMPLIANCE

I hereby certify that I have read this appellate brief, and to the best of my knowledge, information, and belief, it is not frivolous or imposed for any improper purpose. I further certify that this brief complies with all applicable Nevada Rules of Appellate Procedure, in particular NRAP 28(e), which requires every assertion in the brief regarding matters in the record be supported by reference to the page or transcript or appendix where the matter relied upon is found. In addition, I certify that this brief satisfied NRAP 32 with an approximate word count of 1,278 words. I understand that I may be subject to sanctions in the event that the accompanying brief is not in conformity with the requirement of the Nevada Rules of Appellate Procedure.

Dated this 29th day of December, 2021.

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

By: /s/ Eric K. Stryker
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Frank J. DeLee, M.D. and Frank J.
DeLee M.D., P.C.*

26.1 DISCLOSURE STATEMENT

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.

Frank J. DeLee, M.D. and Frank J. DeLee M.D., P.C. do not have a parent corporation.

Wilson, Elser, Moskowitz, Edelman & Dicker LLP, attorney Eric K. Stryker, Esq.

Dated this 29th day of December, 2021.

By: /s/ Eric K. Stryker
ERIC K. STRYKER, ESQ.
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*Attorneys for Real Party in Interest
Frank J. DeLee, M.D. and Frank J.
DeLee M.D., P.C.*

CERTIFICATE OF MAILING

I hereby certify that on this 29th day of December, 2021, I served the foregoing
**REAL PARTY IN INTEREST FRANK J. DELEE, M.D. AND FRANK J.
DELEE, M.D., PC'S MOTION FOR LEAVE TO JOIN RESPONDENT
CHLOE GREEN'S ANSWER TO PETITIONER ALI KIA'S PETITION
FOR WRIT OF MANDAMUS** upon the following parties by placing a true and
correct copy thereof in the United States Mail in Las Vegas, Nevada with first class
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CERTIFICATE OF MAILING-CONT'D

THE HONORABLE JASMIN LILLY- SPEARS The Eighth Judicial District Court Department 23 Regional Justice Center 200 Lewis Avenue Las Vegas, NV 89155 <i>Respondent</i>	Aaron Ford Attorney General Nevada Department of Justice 100 North Carson Street Carson City, NV 89701 <i>Counsel for Respondent</i>
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BY: /s/ Jennifer Davidson
An Employee of

