

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

CITY OF LAS VEGAS, A POLITICAL  
SUBDIVISION OF THE STATE OF  
NEVADA,

Appellant,  
vs.

180 LAND CO., LLC, A NEVADA  
LIMITED-LIABILITY COMPANY; AND  
FORE STARS, LTD., A NEVADA  
LIMITED-LIABILITY COMPANY,

Respondents.

No. 84345

Electronically Filed  
Oct 05 2022 01:41 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

180 LAND CO., LLC, A NEVADA  
LIMITED-LIABILITY COMPANY; AND  
FORE STARS, LTD., A NEVADA  
LIMITED-LIABILITY COMPANY,

Appellants/Cross-Respondents,  
vs.

CITY OF LAS VEGAS, A POLITICAL  
SUBDIVISION OF THE STATE OF  
NEVADA,

Respondent/Cross-Appellant.

No. 84640

**UNOPPOSED MOTION FOR LEAVE TO FILE  
JOINT APPENDIX VOLUME 130 UNDER SEAL**

180 Land Co., LLC and Fore Stars Ltd., Respondents in Case No.  
84345 and Appellants/Cross-Respondents in Case No. 84640  
("Landowners"), request leave under SRCR 3(1) to file joint appendix  
volume 130 under seal.

Sealing joint appendix volume 130 is appropriate under SRCR 3(4)(b) and (h) as the District Court designated the documents within this volume as confidential pursuant to the protective order and filed these documents under seal. *See* Oct 26, 2021 Minute Order (**Ex. 1**). Therefore, this Court should grant leave to file joint appendix volume 130 under seal, and accordingly, files volume 130 under seal.

Consistent with the practice of this Court, Landowners electronically filed this motion, without volume 130 which consist of Exhibit FFFF-6 and Exhibit FFFF-7 to the City's Opposition to Plaintiff's Motion to Determine Take and for Summary Judgment on First, Third, and Fourth Claims for Relief and Countermotion for Summary Judgment; and Exhibits B through G to City's Opposition to Plaintiff's Motion in Limine No. 1.

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Landowners will mail a copy of the filed motion along with the CD to all parties associated with this matter and to Supreme Court of Nevada Clerk's Office.

Dated this 5th day of October 2022.

CLAGGETT & SYKES LAW FIRM

/s/ Micah S. Echols

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Micah S. Echols, Esq.  
Nevada Bar No. 8437  
4101 Meadows Lane, Ste. 100  
Las Vegas, Nevada 89107  
(702) 655-2346 – Telephone  
[micah@claggettlaw.com](mailto:micah@claggettlaw.com)  
*Attorneys for 180 Land Co., LLC and  
Fore Stars, Ltd.*

## CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **UNOPPOSED MOTION FOR LEAVE TO FILE JOINT APPENDIX VOLUME 130 UNDER SEAL** with the Supreme Court of Nevada on the 5th day of October 2022. I will electronically serve the foregoing document in accordance with the Master Service List as follows:

George F. Ogilvie III, Esq.  
[gogilvie@mcdonaldcarano.com](mailto:gogilvie@mcdonaldcarano.com)  
John Christopher Molina, Esq.  
[cmolina@mcdonaldcarano.com](mailto:cmolina@mcdonaldcarano.com)

Amanda C. Yen, Esq.  
[ayen@mcdonaldcarano.com](mailto:ayen@mcdonaldcarano.com)  
**McDONALD CARANO LLP**

2300 West Sahara Avenue, Ste., 1200 Las Vegas, Nevada 89102  
(702) 873-4100 – Telephone  
*Attorneys for Appellant and Respondent / Cross-Appellant,  
City of Las Vegas*

Bryan K. Scott, Esq.  
[bscott@lasvegasnevada.gov](mailto:bscott@lasvegasnevada.gov)  
Philip R. Byrnes, Esq.  
[pbyrnes@lasvegasnevada.gov](mailto:pbyrnes@lasvegasnevada.gov)  
Rebecca L. Wolfson, Esq.  
[rwolfson@lasvegasnevada.gov](mailto:rwolfson@lasvegasnevada.gov)

**LAS VEGAS CITY ATTORNEY'S OFFICE**  
495 South Main Street, 6th Floor, Las Vegas, Nevada 89101  
(702) 229-6629 – Telephone  
*Attorneys for Appellant and Respondent / Cross-Appellant,  
City of Las Vegas*

Andrew W. Schwartz (pro hac vice)  
[schwartz@smwlaw.com](mailto:schwartz@smwlaw.com)  
Lauren M. Tarpey (pro hac vice)  
[ltarpey@smwlaw.com](mailto:ltarpey@smwlaw.com)  
396 Hayes Street San Francisco, California 94102  
**SHUTE, MIHALY & WEINBERGER, LLP**  
(415) 552-7272 – Telephone  
*Attorneys for Appellant and Respondent / Cross-Appellant,  
City of Las Vegas*

Debbie A. Leonard, Esq.  
[debbie@leonardlawpc.com](mailto:debbie@leonardlawpc.com)  
**LEONARD LAW, PC**  
955 South Virginia Street, Ste. 220, Reno, Nevada 89502  
(775) 964-4656 – Telephone  
*Attorneys for Appellant and Respondent / Cross-Appellant,  
City of Las Vegas*

Kermitt L. Waters, Esq.  
[kermitt@kermittwaters.com](mailto:kermitt@kermittwaters.com)  
James J. Leavitt, Esq.,  
[jim@kermittwaters.com](mailto:jim@kermittwaters.com)  
Michael Schneider, Esq.  
[michael@kermittwaters.com](mailto:michael@kermittwaters.com)  
Autumn L. Waters, Esq.  
[autumn@kermittwaters.com](mailto:autumn@kermittwaters.com)  
**LAW OFFICES OF KERMITT L. WATERS**  
704 South 9th Street, Las Vegas, Nevada 89101  
(702) 733-8877 – Telephone  
*Attorneys for Respondents and Appellants / Cross-Respondents,  
180 Land Co., LLC, and Fore Stars Ltd.*

Elizabeth Ghanem Ham, Esq.  
[eham@ehbcompanies.com](mailto:eham@ehbcompanies.com)  
**EHB COMPANIES, LLC**  
1215 South Fort Apache Road, Ste. 120, Las Vegas, Nevada 89117  
(702) 940-6930 – Telephone  
*Attorneys for Respondents and Appellants / Cross-Respondents,  
180 Land Co., LLC, and Fore Stars Ltd.*

/s/ Anna Gresl

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Anna Gresl, an employee of  
CLAGGETT & SYKES LAW FIRM

**EXHIBIT 1**

**EXHIBIT 1**

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Other Judicial Review/Appeal**

**COURT MINUTES**

**October 26, 2021**

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A-17-758528-J      180 Land Company LLC, Petitioner(s)  
vs.  
Las Vegas City of, Respondent(s)

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**October 26, 2021      9:05 AM      All Pending Motions**

**HEARD BY:** Williams, Timothy C.      **COURTROOM:** RJC Courtroom 03H

**COURT CLERK:** Christopher Darling

**RECORDER:** Maria Garibay

**PARTIES**

<b>PRESENT:</b>	Ghanem, Elizabeth M.	Attorney for Petitioner
	Leavitt, James J	Attorney for Petitioner
	Molina, J. Christopher	Attorney for Respondent
	Ogilvie, George F., III	Attorney for Respondent
	Schwartz, Andrew W	Attorney for Respondent
	Waters, Autumn L.	Attorney for Petitioner
	Wolfson, Rebecca L	Attorney for Respondent

**JOURNAL ENTRIES**

- Hearing held by live and by BlueJeans remote conferencing.

PLAINTIFF LANDOWNERS' MOTION FOR SUMMARY JUDGMENT ON JUST COMPENSATION  
ON ORDER SHORTENING TIME...CITY'S COUNTERMOTION FOR SUMMARY JUDGMENT AND  
OPPOSITION TO DEVELOPER'S MOTION FOR SUMMARY JUDGMENT ON JUST  
COMPENSATION

Colloquy regarding order of matters. There being agreement, Court directed hearing proceed first  
with Motion for Summary Judgment. Arguments by Mr. Leavitt and Mr. Schwartz. Court stated ITS  
FINDINGS and ORDERED, both Motion and Countermotion DENIED; will allow the expert  
testimony discussed. Prevailing party to prepare the order.

[571] PLAINTIFFS LANDOWNERS' MOTION IN LIMINE NO. 1: TO EXCLUDE 2005 PURCHASE  
PRICE

PRINT DATE: 10/26/2021

Page 1 of 2

Minutes Date: October 26, 2021

Arguments by Mr. Leavitt and Mr. Schwartz. Court stated ITS FINDINGS and ORDERED, Motion GRANTED. Prevailing party to prepare the order.

[573] PLAINTIFF LANDOWNERS' MOTION IN LIMINE NO. 2: TO EXCLUDE SOURCE OF FUNDS  
Arguments by Mr. Leavitt and Mr. Schwartz. Court stated ITS FINDINGS and ORDERED, Motion GRANTED; no need to mention public and/or tax payer. Prevailing party to prepare the order.

[574] PLAINTIFFS LANDOWNERS' MOTION IN LIMINE NO. 3: TO PRECLUDE CITY'S  
ARGUMENTS THAT LAND WAS DEDICATED AS OPEN SPACE/CITY'S PRMP AND PROS  
ARGUMENT

Arguments by Mr. Leavitt and Mr. Schwartz. Offer of proof by Mr. Schwartz. Court stated ITS FINDINGS and ORDERED, Motion GRANTED. Prevailing party to prepare the order.

CITY OF LAS VEGAS' MOTION FOR LEAVE TO FILE UNDER SEAL EXHIBITS FFFF-6 AND FFFF-7 TO CITY'S OPPOSITION TO PLAINTIFF'S MOTION TO DETERMINE TAKE AND FOR SUMMARY JUDGMENT ON THE FIRST, THIRD, AND FOURTH CLAIMS FOR RELIEF AND COUNTERMOTION FOR SUMMARY JUDGMENT...DEFENDANT CITY OF LAS VEGAS' MOTION FOR LEAVE TO FILE EXHIBITS B THROUGH G TO CITY'S OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE NO. 1: TO EXCLUDE 2005 PURCHASE PRICE UNDER SEAL  
Mr. Leavitt advised no opposition. Therefore, COURT ORDERED, Motions GRANTED. Prevailing party to prepare the order.

Colloquy regarding trial protocol, voir dire, and jury instructions. COURT DIRECTED, both sides are to have their jury instructions submitted by the end of this week for this Court's review. Court directed the appropriate orders be prepared from today's hearing.

Proposed order(s) to be submitted to DC16Inbox@clarkcountycourts.us.