

IN THE SUPREME COURT OF NEVADA

-----X
MICHAEL MURRAY, and MICHAEL
RENO, Individually and on behalf of
others similarly situated,

Petitioners,

vs.

The Eighth Judicial District Court of
the State of Nevada, in and for the
County of Clark, and The Honorable,
District Judge Carli Kierny

Respondents,

and

A CAB TAXI SERVICE LLC, A CAB
SERIES LLC formerly known as A
CAB, LLC, and CREIGHTON J.
NADY,

Real Parties in Interest

Sup. Ct. No.

Dist. Ct No.: A-12-069926-C

Dept.: 2

Electronically Filed
Mar 30 2022 11:24 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

**APPENDIX TO
PETITION FOR WRIT OF MANDAMUS
VOLUME VI OF VI**

LEON GREENBERG
PROFESSIONAL CORPORATION
Leon Greenberg, Esq. Bar # 8094
Ruthann Devereaux-Gonzalez, Esq. Bar #15904
2965 South Jones Blvd., #E3
Las Vegas, NV 89146
Attorneys for Petitioners

Chronological Index

Doc. No.	Description	Vol.	Bates Nos.
1	Order Granting Summary Judgment, Severing Claims, and Directing Entry of Final Judgment filed August 21, 2018 with notice of entry	I	PA0001–PA0066
2	Order Denying Plaintiffs’ Motion to Allow Judgment Enforcement filed July 17, 2020 with notice of entry	I	PA0067–PA0073
3	Plaintiffs’ Motion for Appointment of a Receiver to Aid Judgment Enforcement or Alternative Relief filed December 30, 2020	I	PA0074–PA0200
4	Defendants’ Opposition to Plaintiffs’ Motion for Appointment of a Receiver to Aid Judgment Enforcement or Alternative Relief filed January 20, 2021	I-II	PA0201–PA0325
5	Order on Plaintiffs’ Motion for a Receiver to Aid Judgment Enforcement or Alternative Relief filed February 22, 2021 with notice of entry	II	PA0326–PA0331
6	Opinion from The Supreme Court of Nevada in case number 77050 filed December 30, 2021	II	PA0332–PA0365
7	Remittitur issued by The Supreme Court of Nevada in case number 77050 filed February 4, 2022	II	PA0366–PA0367
8	Defendants’ Motion for Declaratory Order filed February 11, 2022	II-III	PA0368–PA0578
9	Plaintiffs’ Motion for Entry of a Modified Judgment as Provided by Remittitur filed February 14, 2022	III-IV	PA0579–PA0765
10	Plaintiffs’ Motion for Entry of Modified Award of Pre-Judgment Attorney’s Fees as Provided for by Remittitur filed February 16, 2022	IV	PA0736–PA0786
11	Plaintiffs’ Motion for an Award of Attorney’s Fees on Appeal filed February 17, 2022	IV	PA0787–PA0801
12	Order of Reversal from The Supreme Court of Nevada in case number 82539 filed February 17, 2022	IV	PA0802–PA0805

13	Opposition to Plaintiffs' Motion for Entry of a Modified Judgment as Provided for by Remittitur filed February 28, 2022	IV-V	PA0806–PA1079
14	Defendants' Motion to Stay on Order Shortening Time filed February 28, 2022	V-VI	PA1080–PA1207
15	Plaintiffs' Response to Defendants' Motion for a Stay on Order Shortening Time Counter-Motion for Award of Attorney's Fees filed March 4, 2022	VI	PA1208–PA1249
16	Reply in Support of Defendants' Motion to Stay on Order Shortening Time filed March 8, 2022	VI	PA1250–PA1264
17	Hearing Transcript March 9, 2022	VI	PA1265–PA1279
18	Declaration of Charles Bass March 28, 2022	VI	PA1280–PA1297

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16	Reply in Support of Defendants' Motion to Stay on Order Shortening Time filed March 8, 2022	VI	PA1250– PA1264

EXHIBIT “8”

EXHIBIT “8”

1 **DECLARATION OF VALERIE S. GRAY, ESQ. IN SUPPORT OF PLAINTIFF'S**
2 **MOTION FOR ATTORNEYS' FEES AGAINST INTERVENORS' COUNSEL**
3 **LEON GREENBERG, ESQ.**

4 I, VALERIE S. GRAY, declare as follows:

5 1. I, Valerie S. Gray, Esq., have personal knowledge as to the facts set forth below, and am
6 competent to testify as to the matter stated herein. I have personal knowledge of the facts set forth
7 herein except those stated upon information and belief, which are based upon my knowledge and belief
8 of their veracity.

9 2. I am an attorney, duly licensed to practice law before all of the Courts of the State of
10 Nevada, and I am an attorney at the law firm of The Bourassa Law Group.

11 3. The Bourassa Law Group is counsel of record for Jasminka Dubric, individually and on
12 behalf of those similarly situated, in the matter of *Dubric v. A Cab, LLC, et al.* District Court Case No.
13 A-15-721063-C.

14 4. This Declaration is filed in support of Plaintiff's Motion for Attorneys' Fees Against
15 Intervenor's Counsel Leon Greenberg, Esq. and pursuant EDCR §2.21.

16 5. Plaintiff retained The Bourassa Law Group, (the "firm"), who prosecuted Plaintiff's
17 claims under a modified contingency fee agreement that allows Plaintiff's counsel to recover the greater
18 of the 33.33% of the gross recovery or the hourly rate of \$450 for attorneys' time and \$150 for paralegal
19 time.

20 6. This case was submitted to a settlement conference on October 5, 2016, before the
21 Honorable Jerry A. Wiese II. As a result of the settlement conference, the Parties arrived at a mutually
22 agreeable Settlement Agreement on a class wide basis.

23 7. Pursuant to the terms of the Settlement Agreement and in addition to the Settlement
24 Fund, Defendants also agreed that it will not oppose a request for reasonable attorneys' fees and
25 litigation costs by Plaintiff's Counsel on the condition that such request shall not exceed \$57,500.00.

26 8. At the time Plaintiff settled with Defendants, Plaintiff estimate her attorneys' fees and
27 costs to amount to \$57,500; therefore, Defendants agreed to pay this amount in the Settlement
28 Agreement.

1 9. Due to Intervenor by and through Mr. Greenberg delaying this matter an additional five
2 years with multiple motions, hearings, and appeals that required Plaintiff's counsel to vigorously
3 oppose, Plaintiff's attorneys' fees rose to \$216,650.00.

4 10. I have looked through the time entries for this matter in the normal scope of my work.
5 Attached hereto as Exhibit "8-A" are true and correct copies of The Bourassa Law Group's time entries to
6 prosecute this case (redacted for privilege). Each of these time entries describe in detail the type of legal
7 services provided based on contemporaneous time records, the date the service was provided, the
8 attorney providing the service, and the time spent in providing the service. Although these invoices are
9 redacted as they contain both attorney work-product and information concerning attorney-client
10 communications, Plaintiff will provide unredacted copies for the Court's *in-camera* review upon
11 request.

12 11. I have looked through the time entries for this matter to become familiar with the work
13 performed on this matter. The amount of time spent by the attorneys on this matter is believed to be
14 commensurate with the nature of the dispute, the amount in controversy, and the duration of the dispute.

15 12. Plaintiff's claims are for the recovery of monies owing by Defendants on a class wide
16 basis based upon alleged violations of the Nevada Constitution, Article 15, Section 16 and NRS
17 608.160(1)(b) for their failure to pay a minimum wage and for other unlawful and/or unauthorized
18 deductions from Plaintiff's and the other Drivers' wages, including but not limited to deductions for
19 purported "cash loan fees," thus causing Plaintiff's and the other Drivers' pay to drop below minimum
20 wage. The Intervenor appeared in this case to dispute the class wide settlement reached.

21 13. The attorneys' fees requested herein are believed to be reasonable relative to the skill
22 necessary to prosecute a case of this nature and the nature of the dispute.

23 14. The work actually performed in prosecution of Plaintiff's claims against the Intervenor,
24 included opposing motions, opposing appeals, and attending various hearings before the court and other
25 activities over five years that permitted Plaintiff to demonstrate the settlement was fair, reasonable, and
26 not the result of collusion as continuously argued by the Intervenor by and through its counsel Leon
27 Greenberg.

28 15. No specific time limitations were imposed in this case.

1 16. These attorneys' fees were incurred by myself, Mark Bourassa, Trent Richards, Jennifer
2 Fornetti, Hillary Ross, and Shaina Corpodian.

3 17. I am an attorney in the firm's Las Vegas office. I have been practicing law for over two
4 years. My practice focuses on general litigation, including personal injury litigation, construction
5 litigation, contract litigation, and employment litigation in both state and federal courts, as well as some
6 criminal defense work. I obtained my law degree from the University of Nevada Las Vegas, William S.
7 Boyd School of Law and hold a Masters in Business Administration. I am admitted to practice in all
8 State and Federal Courts in Nevada. I expended 171.9 billed hours in connection with this case.

9 18. Mark Bourassa is the founding Member of The Bourassa Law Group. He has been
10 practicing law for over eighteen years. Mr. Bourassa's practice focuses on litigation and trial work in
11 civil matters representing clients in state and federal courts in consumer litigation, including plaintiff
12 and defense side FDCPA litigation, consumer law, construction defect claims, and personal injury. Prior
13 to founding The Bourassa Law Group, Mr. Bourassa was a partner in the Las Vegas office of a law firm
14 with a substantial litigation practice in complex multi-party tort litigation, construction defect claims
15 (representing developers and general contractors) and general liability litigation. Mr. Bourassa obtained
16 his law degree *cum laude* from Pepperdine University School of Law. He is admitted to practice in all
17 State Courts in Arizona, California, and Nevada as well as the United States District Court, District of
18 Nevada, District of Northern California, District of Central California, District of Arizona, the Ninth
19 Circuit Court of Appeals and the United States Supreme Court. Mr. Bourassa has litigated and resolved
20 millions of dollars in claims ranging from small claims lawsuits to complex multi-party tort litigation
21 Mr. Bourassa expended a total of 39.2 billed hours in connection with this litigation.

22 19. Trent Richards was an attorney in the Firm's Las Vegas office. Mr. Richards has been
23 practicing law for over ten years and is a Martindale-Hubble AV rated attorney. His practice with the
24 firm included business and contract litigation, commercial transaction work, gaming law and consumer
25 law. Prior to joining the firm, he worked as an associate attorney at a prominent firm in Las Vegas,
26 Nevada with a strong emphasis in business transactions, commercial leases and gaming law. Prior to
27 practicing law, he served in the United States Marine Corps from 1997 until 2003. He holds a Masters
28 in Business Administration and received his Juris Doctorate from the University of Nevada Las Vegas,

1 William S. Boyd School of Law. He is admitted to the State Bar of Nevada, the United States District
2 Court for the District of Nevada, the United States Bankruptcy Court for the District of Nevada, the
3 Ninth Circuit Court of Appeals, the U.S. Tax Court, and the state court of Utah. Mr. Richards expended
4 194.3 billed hours in the prosecuting this case.

5 20. Jennifer Fornetti is an attorney in the Firm's Las Vegas office. She has been practicing
6 law for over nineteen years. Her current practice focuses on general liability litigation, personal injury
7 litigation, construction litigation and business and real estate litigation in both state and federal courts.
8 Prior to joining The Bourassa Law Group, she was a junior partner at a local law firm, where the clients
9 ranged from individuals to Fortune 500 companies and the firm also served as panel counsel for over a
10 dozen insurers. She obtained my law degree from Saint Louis University School of Law. She is
11 admitted to practice in all State and Federal Courts in Nevada, as well as the Arizona, Missouri, and
12 Colorado State Courts. She has expended 9.6 billed hours in connection with this litigation.

13 21. Shaina Corpodian was an attorney at the Firm's Las Vegas office. Ms. Corpodian has
14 been practicing law for approximately four years. Ms. Corpodian's practice with the firm focused on
15 general liability litigation, including personal injury litigation, construction litigation, and contract
16 litigation in both state and federal courts. Ms. Corpodian obtained her law degree from Pepperdine
17 University School of Law. Ms. Corpodian is admitted to practice in all state and federal courts in
18 Nevada. Ms. Corpodian expended 7.8 billed hours in connection with this litigation.

19 22. Hillary Ross is a partner in the Firm's Denver office. Ms. Ross has been practicing law
20 for over twelve years. Ms. Ross' practice focuses on general litigation, employment, consumer claims
21 and class actions in both state and federal courts. Prior to joining The Bourassa Law Group, Ms. Ross
22 was a staff attorney at a regional Denver law firm representing employers in employment and labor law
23 matters. Prior to relocating to Denver, Ms. Ross was an associate at a national employment and labor
24 firm in Los Angeles, representing employers in employment and labor litigation with an emphasis on
25 class action wage and hour claims. Ms. Ross obtained her law degree *cum laude* from Pepperdine
26 University School of Law. Ms. Ross is admitted to practice in all State Courts in California and
27 Colorado, as well as the United States District Court for the Central District of California, the District of
28 Colorado, and the Ninth Circuit Court of Appeals. Although Ms. Ross is not licensed to practice law in

1 Nevada, Ms. Ross' role in this matter was limited to rendering support in the form of brief writing and
2 legal research from the Firm's Denver office under Mr. Bourassa's direct supervision. Ms. Ross did not
3 sign pleadings or appear before the court, had no contact with Defendant, and all work performed by her
4 was personally reviewed by Mr. Bourassa or Mr. Richards. Ms. Ross expended 62.3 billed hours in
5 connection with this litigation.

6 23. The Firm has billed over 484.93 hours of attorney time for this mater.

7 24. In addition to the attorneys, paralegal support devoted a total of 125.45 hours of time
8 organizing documents, preparing exhibits, preparing documents, and assisting with overall case
9 preparation under direct supervision of the attorneys listed above.

10 25. All of the persons recording time in this matter recorded their time on a contemporaneous
11 basis, described the type of legal services provided, the date the service was provided, the attorney or
12 paralegal providing the service and the time spent on providing the service. Further, all time was
13 submitted into a computerized billing software.

14 26. In total, Plaintiff incurred \$159,150.00 in attorneys' fees to vigorous oppose Intervenor's
15 claims.

16 27. Based upon my experience, I believe the amount of time expended by Plaintiff's counsel
17 in this matter, and the rates sought, are reasonable and comparable to that charged by others in the area
18 for cases of similar complexity and counsel's level of skill and expertise.

19 28. Request is hereby made, on behalf of Plaintiff, for an award of attorney fees in the total
20 amount of \$159,150.00 against Leon Greenberg.

21 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND
22 CORRECT.

23 EXECUTED this 21st day of September 2021.

24 /s/ Valerie S. Gray
25 VALERIE S. GRAY, ESQ.
26
27
28

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

4
5
6 Michael Murray, Plaintiff(s)

CASE NO: A-12-669926-C

7 vs.

DEPT. NO. Department 2

8 A Cab Taxi Service LLC,
9 Defendant(s)

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District
13 Court. The foregoing Order Shortening Time was served via the court's electronic eFile
system to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 2/28/2022

15 "Esther Rodriguez, Esq." .

esther@rodriguezlaw.com

16 Assistant .

info@rodriguezlaw.com

17 Cindy Pittsenbarger .

cpittsenbarger@hutchlegal.com

18 Dana Sniegocki .

dana@overtimelaw.com

19 Esther Rodriguez .

esther@rodriguezlaw.com

20 filings .

susan8th@gmail.com

21 Hilary Daniels .

hdaniels@blgwins.com

22 Hillary Ross .

hross@blgwins.com

23 leon greenberg .

leongreenberg@overtimelaw.com

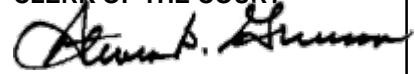
24 Leon Greenberg .

wagelaw@hotmail.com

25 Michael K. Wall .

mwall@hutchlegal.com

1	Susan .	susan@rodriguezlaw.com
2	Susan Dillow .	susan@rodriguezlaw.com
3	Trent Richards .	trichards@blgwins.com
4	Jay Shafer	JShafer@premierlegalgroup.com
5	Christian Gabroy	christian@gabroy.com
6	Katie Brooks	assistant@gabroy.com
7	Katie Brooks	assistant@gabroy.com
8	Christian Gabroy	christian@gabroy.com
9	Elizabeth Aronson	earonson@gabroy.com
10	Christian Gabroy	christian@gabroy.com
11	Kaine Messer	kmesser@gabroy.com
12	Ali Saad	ASaad@resecon.com
13	Peter Dubowsky, Esq.	peter@dubowskylaw.com
14	Amanda Vogler-Heaton, Esq.	amanda@dubowskylaw.com
15	William Thompson	william@dubowskylaw.com
16	Kaylee Conradi	kconradi@hutchlegal.com
17	R. Reade	creade@crdslaw.com
18	Kathrine von Arx	kvonarx@crdslaw.com
19	Ruthann Devereaux-Gonzalez	ranni@overtimelaw.com
20		
21		
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23		
24		
25		
26		
27		
28		



1 **RESP**

2 LEON GREENBERG, ESQ., SBN 8094
3 RUTHANN DEVEREAUX-GONZALEZ, ESQ., SBN 15904
4 Leon Greenberg Professional Corporation
5 2965 South Jones Blvd- Suite E3
6 Las Vegas, Nevada 89146
7 (702) 383-6085
8 (702) 385-1827(fax)
9 leongreenberg@overtimelaw.com

6 CHRISTIAN GABROY, ESQ., SBN 8805
7 Gabroy Law Offices
8 170 S. Green Valley Parkway - Suite 280
9 Henderson Nevada 89012
10 Tel (702) 259-7777
11 Fax (702) 259-7704
12 christian@gabroy.com

10 Attorneys for Plaintiffs

11 **DISTRICT COURT**
12 **CLARK COUNTY, NEVADA**

12 MICHAEL MURRAY, and MICHAEL)
13 RENO, Individually and on behalf of)
14 others similarly situated,)

15 Plaintiffs,)

16 vs.)

17 A CAB TAXI SERVICE LLC, A CAB)
18 SERIES LLC formerly known as A)
19 CAB LLC, and CREIGHTON J. NADY,)
20 Defendants.)

Case No.: A-12-669926-C

Dept.: II

**PLAINTIFFS' RESPONSE TO
DEFENDANTS' MOTION
FOR A STAY ON ORDER
SHORTENING TIME**

**COUNTER-MOTION FOR
AWARD OF ATTORNEY'S
FEES**

Hearing Date: March 9, 2022
Hearing Time: 9:30 a.m.

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24 Plaintiffs, through their attorneys, Leon Greenberg Professional Corporation,
25 hereby submit this response to defendants' motion for a stay on an order shortening
26 time and counter-motion for an award of attorney's fees.
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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **ARGUMENT**

3 **I. The claims against A Cab Series LLC have been resolved by a final**
4 **judgment entered on August 21, 2018, that will not be altered by the**
5 **Dubric proceedings and appeal; no stay of that judgment is proper.**

6 The plaintiffs' claims against defendant A Cab Series LLC (formerly known as
7 "A Cab LLC") have been fully resolved by the final judgment entered in this case on
8 August 21, 2018, as modified by the Nevada Supreme Court. A Cab Series LLC is
9 liable to the class members for over \$800,000 in unpaid minimum wages and post-
10 judgment interest, a liability that cannot be modified by the *Dubric* judgment or
11 appeal. Its request for a stay of this case, without posting a bond for that over
12 \$832,000 liability, pending the outcome of the *Dubric* appeal, falsely asserts that
13 "Plaintiffs' own appeal and admissions" in *Dubric* establish this case "...cannot
14 proceed until a decision is issued by the Nevada Supreme Court" because plaintiffs are
15 "...arguing to the Nevada Supreme Court to strike down the *Dubric* final order because
16 it will affect any future entry of judgment..." in this case. Motion, p. 1., 28 - p. 2., 1.2.,
17 p. 5, 1. 5-10. The plaintiffs have made no such argument.

18 **A. The *Dubric* judgment is void *ab initio* in respect to the liability**
19 **imposed on A Cab Series LLC by the August 21, 2018, final**
20 **judgment in this case.**

21 The *Dubric* judgment, entered on August 31, 2021, (Ex. "A")¹ is *void* for lack of
22 subject matter jurisdiction, to the extent it purports to modify or release any liability
23 of defendant A Cab Series LLC, resolved in this case's earlier final judgment entered
24 on August 21, 2018, as modified in amount by the Nevada Supreme Court. *Dubric*
25 could not, after August 21, 2018, obtain subject matter jurisdiction over those resolved
26 liabilities (they were only subject to alteration via a final judgment appeal in this case).
27 Lacking subject matter jurisdiction over those claims, the *Dubric* judgment is *void ab*

28 ¹ Defendants, most inappropriately, do not furnish the Court with the *Dubric*
judgment resulting in the appeal they claim warrants the stay they seek.

1 *initio*, in respect to the same. *See, State Indus. Ins. System v. Sleeper*, 679 P.2d 1273,
2 1274 (Nev. Sup. Ct. 1984) (“There can be no dispute that lack of subject matter
3 jurisdiction renders a judgment void.”).

4 The Nevada Supreme Court recognized the August 21, 2018, final judgment
5 precluded action by *Dubric* involving the claims in this case against A Cab Series LLC
6 when it concluded writ proceedings in *Dubric* A Cab Series LLC had been required to
7 answer. It found that “the class claims had been resolved” against A Cab Series LLC
8 by “the final judgment” entered in this case. Ex. “B” Nevada Supreme Court Order of
9 September 13, 2018. Nor is there any “future entry of judgment” to be made in this
10 case against A Cab Series LLC. The Supreme Court has held in this case, citing *Schiff*
11 *v. Winchell*, 237 P.3d 99, 101 (Nev. Sup. Ct. 2010) that its “....modification on appeal
12 was, in effect, an affirmation of the original judgment.” Ex. “C” Order of February 3,
13 2022, P.2. *See, Schiff, id.* (Discussing sister state court decisions finding “...any
14 modification on appeal, whether upward or downwards, as an affirmation of the
15 original judgment” and holding “we adopt the same rationale for Nevada.”)

16 There will be no “future” final judgment in this case against A Cab Series LLC.
17 There is only the August 21, 2018, final judgment, as reduced by the Nevada Supreme
18 Court, that has controlled the resolution of A Cab Series LLC’s liabilities to the
19 plaintiffs since that date. And it will continue to be so controlling. The subsequent
20 2021 judgment in *Dubric* cannot release, settle, or modify, those liabilities or the
21 plaintiffs’ rights arising under the 2018 judgment in this case. It would be an abuse of
22 discretion to stay the plaintiffs’ long delayed enforcement of those rights, and that
23 judgment, when the *Dubric* appeal cannot result in any change to the plaintiffs’ rights
24 against A Cab Series LLC under the August 21, 2018, final judgment.
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1 **B. The impact of the *Dubric* judgment on the plaintiffs' derivative**
2 **claims against defendant Nady and defendants' associates is**
3 **arguably unclear; but that ambiguity is irrelevant to the final**
4 **judgment rendered against A Cab Series LLC in this case.**

5 The plaintiffs, if their only claims were against A Cab Series LLC, might have
6 elected to ignore, and not appeal, the judgment in *Dubric* since it was *void ab initio* for
7 lack of subject matter jurisdiction in respect to those claims. But the plaintiffs also
8 have stayed and severed derivative claims in this case against defendant Nady and
9 fraudulent conveyance claims asserted in another action against associates of A Cab
10 Series LLC and Nady. Those claims are valuable to the plaintiffs if A Cab Series LLC
11 does not satisfy the August 21, 2018, judgment and those claims are not resolved by
12 such judgment. Yet the *Dubric* final judgment also purports to release those claims.
13 Whether *Dubric's* purported release of those claims, if not reversed on direct appeal,
14 would also be deemed *void ab initio* for lack of subject matter jurisdiction is arguably
15 unclear, as no prior final judgment expressly extinguished those claims² (unlike the
16 August 18, 2018, judgment's express resolution of the claims against A Cab Series
17 LLC).

18 Defendants' insistence plaintiffs admit, through their appeal of the *Dubric*
19 judgment, that the *Dubric* proceedings can affect their final judgment against A Cab
20 Series LLC in this case is false (it cannot). But the *Dubric* judgment, if not directly

21 ² All of these claims are derivative from A Cab Series LLC's liability to the
22 plaintiffs and its inability to satisfy that liability (either because it is Nady's alter ego
23 or fraudulent conveyances have occurred). Plaintiffs contend that *Dubric*, lacking
24 subject matter jurisdiction over A Cab Series LLC's liability to the plaintiffs, also
25 cannot possess subject matter jurisdiction over such wholly derivative claims even
26 though they were not resolved by the August 21, 2018, final judgment. In addition,
27 the class representative plaintiff in *Dubric*, Jasminka Dubric, is *not* a class member or
28 plaintiff judgment creditor in this case. She lacks standing to represent the class of
 persons possessing those derivative claims, arising from A Cab Series LLC's inability
 to satisfy the judgment in this case (she cannot represent a class of which she is not a
 member). Her lack of standing in that regard also deprived *Dubric* of subject matter
 jurisdiction over those derivative claims.

1 appealed, could, arguably, impair the plaintiffs' rights against Nady and other
2 potentially liable parties against whom they have yet to secure a final judgment. Class
3 counsel in this case was obligated to intervene and appeal in *Dubric* for that reason;
4 they would have grossly neglected the interests of their class member judgment
5 creditor clients, and committed malpractice, if they had failed to do so.

6 **II. The conduct of plaintiffs' counsel in *Dubric* is completely irrelevant**
7 **to this case and the motion for a stay; defendants are making**
8 **a deplorable *ad hominem* attack on plaintiffs' counsel.**

9 Defendants' motion makes an *ad hominem* attack on plaintiffs' counsel by
10 falsely accusing it of "a barrage of character attacks" and a "personal attack" against
11 Judge Delaney and falsely accusing such counsel of alleging she was "colluding with
12 both parties in approving the *Dubric* class settlement." Motion, p. 3, l. 19-20, p. 4, l.
13 20. Plaintiffs' counsel have made no such "collusion" accusation or "character" or
14 "personal attack," (defendants cite no actual materials supporting such assertions).
15 Such counsel acted within their rights by properly requesting recusal of Judge
16 Delaney and appealing the denial of that request.³ Defendants, citing another case
17 where plaintiffs' counsel unsuccessfully sought recusal, argue they have established a
18 "likelihood of success" in the *Dubric* appeal supporting the granting of a stay.
19 Motion p. 4, l. 16-18.

21 ³ As discussed in plaintiffs' appeal brief in *Dubric*, plaintiffs only sought
22 recusal of Judge Delaney *after* the August 21, 2018, final judgment and *after* Judge
23 Delaney indicated she would proceed to consider granting preliminary approval to a
24 class action settlement purporting to include claims adjudicated into that final
25 judgment. Motion, Ex. "A," p. 8. Judge Delaney's final approval of that proposed
26 class action settlement, and her refusal to expressly exclude from that class settlement
27 the class member judgment creditors under the August 21, 2018, final judgment, has
28 in turn resulted in an appeal of that recusal denial. Neither Judge Delaney, nor the
parties in *Dubric*, have ever explained how *Dubric* can exercise subject matter
jurisdiction over, and release and settle, the claims resolved by the August 21, 2018,
final judgment.

1 Plaintiffs' counsel's lack of success in securing recusal in two cases has nothing
2 to do with the "likelihood of success" of anything at issue in the *Dubric* appeal.
3 Plaintiffs' potential lack of success on the recusal issue in the *Dubric* appeal has no
4 bearing on whether the *Dubric* final judgment will be reversed. And the *Dubric*
5 appeal, and judgment, as discussed *supra*, cannot lessen or modify the liability
6 imposed against A Cab Series LLC by the August 21, 2018, final judgment.

7 Defendants continue this baseless *ad hominem* attack on plaintiffs' counsel by
8 claiming such counsel abusively multiplied the attorney's fees and costs of the *Dubric*
9 parties, attaching as an exhibit part of the motion briefing on that issue in *Dubric*.
10 They fail to mention that motion in *Dubric* was denied, with a finding that no such
11 improper conduct by plaintiffs' counsel took place: Attached as Ex. "D" is the Order
12 in *Dubric* denying that motion for attorney's fees and finding plaintiffs' counsel's
13 conduct as intervenors' counsel in *Dubric* was proper.

14 **III. It would be an abuse of discretion to grant the requested stay,**
15 **especially without the posting of a *supercedes* bond; A Cab Series**
16 **LLC will not suffer any legal harm from a denial of the stay and**
plaintiffs will be irreparably harmed if such a stay is granted.

17 **A. A Cab Series LLC will not be harmed by a denial of the**
18 **requested stay; it will have to honor its legal obligations.**

19 As discussed, *supra*, A Cab Series LLC is subject to a final judgment that will
20 not be altered in any fashion by the outcome in *Dubric*. If it refuses to satisfy that
21 judgment voluntarily, it remains to be seen what property A Cab Series LLC may have
22 properly attached to satisfy that judgment. The defendants claim that certain property
23 has been improperly seized to satisfy that judgment and if the judgment is not stayed
24 attempts will be made in the future to seize property not properly attached by that
25 judgment. In furtherance of this argument, they claim the liability imposed by the
26 August 21, 2018, final judgment, must be re-examined to determine *who is liable*
27 *under that judgment* because in its Opinion " ...the Nevada Supreme Court
28 specifically stated that a determination had to be made as to which entity existed at the

1 time and which bears liability for any damages that are determined. ” Motion p. 8, l.
2 16-18. Defendants do not explain this assertion, which is completely false, or cite to
3 any portion of the Nevada Supreme Court’s Opinion.

4 There is no question *who* is liable under the judgment: A Cab Series LLC is the
5 judgment debtor who must honor its legal obligations. Disputes over what property is
6 subject to seizure to enforce that judgment do not justify a stay of the judgment. Due
7 process protections exist for defendants to be heard in supplementary judgment
8 execution proceedings in respect to any property seizures attempted under the
9 judgment.⁴

10 **B. The interests of non-parties will not be**
11 **harmd by a denial of the requested stay.**

12 Defendants claim that “other entities within A Cab Series LLC” (a term they do
13 not explain) will be harmed by a denial of the stay because they “settled their claims
14 with class members through *Dubric*” and may be subject to “giving class members
15 double recoveries” if the stay is denied. Motion, p. 8, l. 11-14. That is nonsensical.
16 If those “other entities” are truly separate from A Cab Series LLC the final judgment
17 in this case has no impact on them and that judgment cannot force them to pay
18 “double recoveries” (or anything) since they have no liability under such judgment.
19 And if they are subject to that judgment (meaning they are actually the judgment
20 debtor A Cab Series LLC or an asset of the same), nothing in *Dubric* or the *Dubric*
21 appeal will change that liability.

22 There are no non-parties, either associated with defendants or alleged class
23 members in *Dubric*, that will be harmed by a denial of the stay request. The vast
24 majority of the identified *Dubric* class members (at least 797 of 1,115 or over 71%) are
25

26 ⁴ One month has now passed since remittitur and defendants have yet to
27 request the further evidentiary hearing granted to them by the Nevada Supreme Court
28 in respect to an over \$220,000 judgment execution in 2018 that they claim was
improper. Presumably they have failed to do so because that claim is baseless.

1 confirmed to be class members in this case. Motion, Ex. “A,” p. 16. Whatever funds
2 defendants may be intending to pay under their agreement in *Dubric* can be paid in
3 this case, under the Court’s supervision, to the class members in this case,⁵ towards the
4 satisfaction of the August 21, 2018, final judgment. The only reason for a delay in
5 such payments is not the *Dubric* appeal, or these proceedings, but A Cab Series LLC’s
6 refusal to satisfy that final judgment.

7 **C. A stay of the final judgment will irreparably harm**
8 **the plaintiffs, particularly if no supercedes bond is posted.**

9 Over three and one-half years have passed since the final judgment and the class
10 members have yet to be paid one cent of their unpaid minimum wages. Judgement
11 debtor A Cab Series LLC has only posted \$100,000 as security for a judgment that now
12 totals over \$832,000 with post-judgment interest. Ex. “E” ¶ 2. A Cab Series LLC also
13 owes plaintiffs’ counsel an amount of attorney’s fees with post judgment interest well
14 in excess of \$550,000 but such counsel (working on this case since 2012) have yet to
15 be paid anything and have expended in excess of \$68,000 in expenses prosecuting this
16 case. *Id.* Publicly available information establishes that the A Cab taxi service⁶ has
17 earned at least \$1,500,000 in profits from 2018 to the present. *Id.*, ¶¶ 3-4. Its
18 financial performance in 2021 (at least \$12,099,504 in taxi fare revenue) exceeded by
19 over 10% its pre-covid 2019 revenue. *Id.* It has refused to seek bankruptcy protection
20 because no such relief is available to it. It can easily afford to pay the plaintiffs’
21 judgment, it just refuses to do so. Its owner (defendant Nady) has instead removed
22

23
24 ⁵ To the extent defendants seek to make payments to settle the claims of
25 persons who are *not* class members in this case they are, and have always been, free to
do so.

26 ⁶ Defendant “A Cab Series LLC” is the entity to whom the Nevada Taxicab
27 Authority has issued non-transferrable taxi medallions. Defendants seem to allege
28 those medallions, used to provide the A Cab taxi service, are operated by numerous
other entities. The significance, if any, and the truth, of those allegations is unknown.

1 \$1,900,000 in equity from it between 2016 and 2018. *See*, Report of Court appointed
2 Special Master, George Swarts, filed February 1, 2019, p. 3, l. 25 - p. 4, l. 1.

3 A Cab Series LLC has received all of the due process protections available to it,
4 including a now concluded appeal of the final judgment. This case is over. The final
5 judgment (as reduced upon appeal by the Supreme Court) is not subject to further
6 examination or modification, whether from the *Dubric* proceedings or for any other
7 reason. It is a final liability that must be enforced and honored. The Nevada Supreme
8 Court agreed in its decision of February 17, 2022, reversing this Court's Order denying
9 the appointment of a receiver to aid in judgment enforcement and directing this Court
10 consider appointing the same.⁷ Ex. "F." No reason exists to stay this case, particularly
11 if no bond is posted for this long outstanding judgment. Granting such a stay would
12 irreparably harm the plaintiffs and constitute an abuse of discretion.

13 IN SUPPORT OF THE COUNTER-MOTION

14 I. **Plaintiffs are prevailing parties in this litigation by a final 15 judgment and under Nevada's Constitution must receive 16 attorney's fees for work performed in post-judgment proceedings.**

17 Plaintiffs secured a final judgment in their favor under the Nevada Constitution,
18 Article 15, Section 16, the Nevada Minimum Wage Amendment (the "MWA"),
19 providing that "...an employee who prevails in any action to enforce this section shall
20 be awarded his or her reasonable attorney's fees and costs." Plaintiffs prevailed in this
21 Court and secured a final judgment in their favor on August 21, 2018, that judgment
22 being modified on appeal only to the extent of disallowing damages awarded for the
23 period prior to October 8, 2010, such judgment otherwise being fully affirmed.⁸ They

24 ⁷ The Court issued that reversed Order, erroneously finding the receiver
25 appointment issue was already resolved, based on false representations made by
26 defendants in connection with the same. Defendants, in this motion, are seeking to
27 again lead the Court into committing error by making similarly false representations.

28 ⁸ As discussed in plaintiffs' other pending motion, that judgment was affirmed
for \$686,770 (66.48%) of its original amount of \$1,033,027.

1 are “prevailing employees” in this litigation who must receive appropriate awards of
2 attorneys fees (motions concerning their award of pre-judgment attorney’s fees and
3 attorney’s fees on their successful response to defendants’ final judgment appeal are
4 currently pending with the Court).

5 In these post-judgment proceedings the plaintiffs have already secured
6 “prevailing party” status through a final judgment awarding them unpaid minimum
7 wages and their attorney’s post-judgment actions taken to enforce or defend that
8 judgment must also receive an award of attorney’s fees. *See, Velez v. Vassallo*, 203 F.
9 Supp. 2d 312, 315 (S.D.N.Y. 2002) (Additional attorney’s fees awarded in case under
10 New York and Federal minimum wage laws for post-judgment attorney work); *Weyant*
11 *v. Okst*, 198 F.3d 311, 316 (2nd Cir. 1999) (Section 1983 plaintiffs must receive
12 attorney’s fees for “...opposing defendant’s unsuccessful postjudgment motions.”);
13 *Torres-Rivera v. O’Neill-Cancel*, 524 F.3d 331, 335, 341 (2nd Cir. 2008) (Recognizing
14 “presumption” that Section 1983 plaintiffs are to be awarded attorney’s fees for
15 compelling collection of judgment); *Lindsay v. Pacific Topsoils*, 120 P.3d 102, 109
16 (Wash. Ct. App. 2005) (If statute allows award of attorney’s fees it should also apply to
17 post-judgment litigation, citing *Weyant* and other authorities) (Washington Law); and
18 other cases.

19 **II. Plaintiffs should be awarded attorney’s**
20 **fees of \$6,800 for opposing this motion.**

21 As discussed, *supra*, the defendants’ motion is without merit and must be denied.
22 Plaintiffs, the prevailing parties in this case, must be awarded fees for the associated
23 expenditure of attorney time in opposing that motion and defending their MWA
24 judgment. That award is required to ensure defendant, a “deep pocket losing party,”
25 does not, through its “recalcitrance,” evade the purpose of attorney’s fee awards in
26 cases such as this by causing an “....erosion of fees awarded to the plaintiff for time
27 spent obtaining the favorable judgment by requiring additional time be spent thereafter
28 without compensation.” *See, Hines v. City of Albany*, 862 F.3d 215, 222-23 (2nd Cir.

1 2017), citing and quoting *Weyant*, 198 F.3d at 316, and *Gagne v. Maher*, 594 F.2d 336,
2 344 (2nd Cir. 1979), *affirmed* 448 U.S. 122 (1980). Defendants have proceeded with
3 this motion solely to harass plaintiffs' counsel and obstruct the collection of the
4 plaintiffs' judgment.

5 Plaintiffs' counsel should be awarded a fee of \$6,800 for opposing this motion,
6 activity that has and will consume at least 17 hours of such counsel's time, as
7 discussed in the annexed Ex. "E" ¶ 6 declaration of Leon Greenberg. The hourly rate
8 requested (\$400) was approved as reasonable for Leon Greenberg's time in this Court's
9 prior Orders of February 6, 2019, granting attorney's fees and the Discovery
10 Commissioner's Report and Recommendation of December 11, 2015, filed on March 4,
11 2016. A far higher hourly rate would also be appropriate, as such counsel in 2016 was
12 awarded fees of \$720 an hour by the Ninth Circuit Court of Appeals and the federal
13 district court. *Id.*

14 CONCLUSION

15 For all the foregoing reasons, defendants' motion should be denied and plaintiffs'
16 counter-motion should be granted.

17
18 Dated: March 4, 2022

19 LEON GREENBERG PROFESSIONAL CORP.

20
21 /s/ Leon Greenberg
22 Leon Greenberg, Esq.
23 Nevada Bar No. 8094
24 2965 S. Jones Boulevard - Ste. E-3
25 Las Vegas, NV 89146
26 Tel (702) 383-6085
27 Attorney for the Class
28

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PROOF OF SERVICE

The undersigned certifies that on March 4, 2022 she served the within:
**PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR A STAY ON AN
ORDER SHORTENING TIME
COUNTER-MOTION FOR AWARD OF ATTORNEY'S FEES**

by court electronic service to:

TO:

Esther C. Rodriguez, Esq.
RODRIGUEZ LAW OFFICES, P.C.
10161 Park Run Drive, Suite 150
Las Vegas, NV 89145

/s/ Ruthann Devereaux-Gonzalez

Ruthann Devereaux-Gonzalez

EXHIBIT "A"

ORDR

MARK J. BOURASSA, ESQ.

Nevada Bar No. 7999

VALERIE S. GRAY, ESQ.

Nevada Bar No. 14716

THE BOURASSA LAW GROUP

2350 W. Charleston Blvd., #100

Las Vegas, Nevada 89102

Telephone: (702) 851-2180

Facsimile: (702) 851-2189

mbourassa@blgwins.com

vgray@blgwins.com

Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

JASMINKA DUBRIC, individually and on behalf) Case No.: A-15-721063-C
of those similarly situated,) Dept. No.: XXV

Plaintiff,)

vs.)

A CAB, LLC, a Nevada Limited Liability) **ORDER APPROVING CLASS ACTION**
Company; A CAB SERIES LLC, EMPLOYEE) **SETTLEMENT, AWARDED ATTORNEY**
LEASING COMPANY, a Nevada Series Limited) **FEES AND COSTS, AND AWARDED**
Liability Company; CREIGHTON J. NADY, an) **INCENTIVE PAYMENTS**
individual; and DOES 3 through 20)

Defendants.)

On March 11, 2021, the above-captioned matter came before the Honorable Kathleen E. Delaney, sitting in Department XXV of the Eighth Judicial District, Clark County, Nevada on the parties Motion for Final Approval of Class Action Settlement and Plaintiff's Motion for Attorneys' Fees, Costs, and Enhancement Award for Named Plaintiff (collectively the "Motions for Final Approval"). Plaintiff JASMINKA DUBRIC appeared by and through her counsel of record, Valerie S. Gray, Esq. and Mark J. Bourassa, Esq. of The Bourassa Law Group; Defendants, A CAB, LLC, A CAB SERIES LLC, EMPLOYEE LEASING COMPANY, and CREIGHTON J. NADY (collectively, "Defendants") appeared

1 by and through their counsel of record Esther C. Rodriguez, Esq. of Rodriguez Law Offices, P.C., and
2 Intervenor MICHAEL MURRAY, MICHAEL RENO, and MICHAEL SARGEANT (the “Intervenor”)
3 and Objectors MARCO BAKHTIARI, MICHAEL BRAUCHLE, THOMAS COHOON, GARY GRAY,
4 JORDON HANSEN, ROGER KELLER, CHRIS D. NORVELL, POLLY RHOLAS and GERRIE
5 WEAVER (the “Objectors”) appeared by and through their counsel of record, Leon Greenberg, Esq.

6 The Court, after having considered the Motions for Final Approval, the papers and pleadings on
7 file herein, the oral arguments of counsel, and good cause appearing therefore, hereby finds as follows:

8 WHEREAS, a class action is pending in this Court entitled *Dubric, et al. v. A Cab, LLC, et al.*,
9 Case No. A-15-721063-C (the “Action”);

10 WHEREAS, Plaintiff Jasminka Dubric (“Settlement Class Representative”), individually and on
11 behalf of the Class, and Defendants (collectively (the “Parties”), entered into the Class Action Settlement
12 Agreement and Release signed by the Parties on December 28, 2016 and filed with the Court on January
13 24, 2017 as an Exhibit to the Parties' Joint Motion for Preliminary Approval of Class Settlement
14 Agreement on an Order Shortening Time (“Settlement Agreement”) setting forth the terms and conditions
15 of the Parties’ proposed settlement (the “Settlement”);

16 WHEREAS, by Order dated October 11, 2020 (the “Preliminary Approval Order”), this Court (a)
17 conditionally certified the Action to proceed as a class action on behalf of a class of all current and
18 formerly hourly paid taxi cab drivers employed by A Cab, LLC and/or A Cab Series, LLC, Employee
19 Leasing Company at any time from April 1, 2009 through July 2, 2014 (the “Class”); (b) appointed The
20 Bourassa Law Group, LLC as Class Counsel; (c) preliminarily approved the Settlement; (d) ordered that
21 Notice of the proposed Settlement be provided to potential Class Members; (e) provided Class Members
22 with the opportunity to: (i) opt out of the Class or (ii) object to the proposed Settlement; and (f) scheduled
23 a hearing regarding final approval of the Settlement;

24 WHEREAS, unless otherwise defined in this Order, the capitalized terms herein shall have the
25 same meaning as they have in the Settlement Agreement;

26 WHEREAS, pursuant to this Court’s Order dated October 11, 2020, the Notice of Proposed Class
27 Action Settlement (the “Class Notice”) was mailed to potential members of the Class to notify them of,
28 among other things: (i) the Action pending against Defendants; (ii) the certification of the Action by the

1 Court to proceed as a class action on behalf of the Court-certified Class; and (iii) their right to opt out of
2 the Settlement, the effect of remaining in the Class or requesting exclusion, and the requirements for
3 requesting exclusion, and their right to object to the proposed Settlement.

4 WHEREAS, due and adequate notice has been given to the Class;

5 WHEREAS, on November 25, 2020, the Plaintiff filed a Motion for Final Approval of Class
6 Action Settlement;

7 WHEREAS, on November 25, 2020, Plaintiff filed a Motion For Award Of Attorney Fees And
8 Costs, And Incentive Awards For Named Plaintiff and a Memorandum of Costs;

9 WHEREAS, the Court conducted a hearing on March 11, 2021 (the “Fairness Hearing”) to
10 consider, among other things: (i) whether the terms and conditions of the Settlement are fair, reasonable
11 and adequate, and in the best interests of the Settlement Class Representative and the other Class Members,
12 and should therefore be approved; (ii) whether the objections filed by the Objectors and/or opposition
13 filed by the Intervenor warrant a denial of the requested final approval of the Settlement or final approval
14 subject to modifications; and (ii) whether an order should be entered dismissing the Action with prejudice
15 against Defendants. In addition, the Court heard Plaintiff’s Motion For Award of Attorney Fees and Costs,
16 and Incentive Awards for Named Plaintiff;

17 WHEREAS, the Court, having reviewed and considered the Motion for Final Approval, the
18 Settlement Agreement, all papers filed and proceedings herein in connection with the Settlement, all oral
19 and written comments received regarding the Settlement, including the objections filed by the Objectors
20 and the opposition filed with respect thereto by the Intervenor, Plaintiff’s Motion For Award of Attorney
21 Fees and Costs and Incentive Awards For Named Plaintiffs and all papers filed in support and in
22 opposition thereto, Plaintiff’s Memorandum of Costs, and the record in the Action, and good cause
23 appearing therefore;

24 NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

25 1. **Jurisdiction.** This Court has jurisdiction over the subject matter of the Action, and all
26 matters relating to the Settlement, as well as personal jurisdiction over all of the Parties and each of the
27 Class Members.

28 2. **Incorporation of Settlement Documents.** This Order incorporates and makes a part

1 hereof: (a) the Settlement Agreement filed with the Court on January 24, 2017; and (b) the Settlement
2 Notice, which was filed with the Court on January 24, 2017 and later amended by the request of the Court
3 and Intervenor and filed with the Court on February 26, 2021; (c) the briefs, declarations, affidavits, and
4 other materials filed in support of the Settlement Class Counsels' request for an award of attorneys' fees,
5 incentive award, and reimbursement of expenses; (d) the record at the Preliminary Approval Hearing; (e)
6 the record at the Fairness Hearing; (f) the documents listed on the docket sheet or otherwise submitted to
7 the Court; and (g) all prior proceedings in the action.

8 3. **Final Class Certification.** The Class was preliminarily certified by this Court on October
9 11, 2020. The Court now enters its final certification of this Class pursuant to NRCP 23 finding that the
10 Class satisfies all applicable requirements of NRCP 23(a) and NRCP 23(b) and due process. The Class
11 shall consist of "all persons who were employed by A Cab, LLC and/or A Cab Series, LLC, Employee
12 Leasing Company during the applicable statutory period prior to the filing of this Complaint continuing
13 until date of judgment as Drivers in the State of Nevada." More specifically, the Settlement Class is
14 defined as all current and former hourly paid Drivers employed by A Cab, LLC and/or A Cab Series LLC,
15 Employee Leasing Company at any time from April 1, 2009 through July 2, 2014.

16 4. **Exclusion.** Michael Murray, Michael Reno, and Michael Sargeant (collectively
17 "Intervenor") are plaintiffs in a separate action entitled *Murray et al. v. A Cab Taxi Service LLC et al.*,
18 Clark County Nevada District Court Case No. A-12-669926-C, which also alleges claims of unpaid
19 minimum wages against A Cab LLC, as well as associated penalties pursuant to NRS 608.040. These
20 individuals are expressly excluded from the Settlement Agreement for all purposes, pursuant to Section
21 8.3. Additionally, the Court finds that only those individuals specifically listed in Exhibit "1," attached
22 hereto, and no other member of the Class, have submitted timely valid requests for exclusion from the
23 Class and therefore are not bound by this Final Order. All other members of the Class are bound by the
24 terms and conditions of the Settlement Agreement and this Final Order.

25 5. **Adequacy of Representation.** Class Representative Jasminka Dubric has adequately
26 represented the Settlement Class for purpose of entering and implementing the Settlement. Mark J.
27 Bourassa of The Bourassa Law Group is experienced and adequate Class Counsel. Class Representatives
28 and Class Counsel have satisfied the requirements of NRCP 23(a)(4) and NRCP 23(f).

1 6. **Settlement Notice.** The Court finds that the dissemination of the Settlement Notice: (i)
2 was implemented in accordance with the Settlement Agreement and Preliminary Approval Order; (ii)
3 constituted the best notice practicable under the circumstances; (iii) constituted notice that was reasonably
4 calculated, under the circumstances, to apprise Class Members (a) of the effect of the Settlement
5 (including the Releases provided for therein), (b) of Class Counsel's motion for an award of attorneys'
6 fees, incentive award to the Settlement Class Representative, and reimbursement of litigation expenses,
7 (c) of their right to object to any aspect of the Settlement, (d) of their right to opt out of the Class, and (e)
8 of their right to appear at the Fairness Hearing; (iv) constituted due, adequate and sufficient notice to all
9 persons entitled to receive notice of the proposed Settlement; and (v) satisfied the requirements of Rule
10 23 of the Nevada Rules of Civil Procedure.

11 7. **Final Settlement Approval.** Pursuant to, and in accordance with Rule 23 of the Nevada
12 Rules of Civil Procedure, this Court hereby fully and finally approves the Settlement set forth in the
13 Settlement Agreement in all respects (including, without limitation: the amount of the Settlement, the
14 Releases provided for therein, and the dismissal with prejudice of claims against Defendants), and finds
15 that the Settlement is, in all respects, fair, reasonable and adequate, and is in the best interest of Settlement
16 Class Representative and the other Class Members. The settlement is approved and all objections to the
17 settlement are overruled.

18 8. **Implementation of the Settlement.** The Parties are directed to implement, perform and
19 consummate the Settlement in accordance with the terms and provisions contained in the Settlement
20 Agreement. The Court orders Defendants to fund the Settlement Fund in the total amount of Two Hundred
21 Twenty-Four Thousand Five Hundred Twenty-Nine Dollars (\$224,529.00), and orders the Class Counsel
22 to disburse the Settlement Fund to the Class Members pursuant to Section 11 of the Settlement Agreement,
23 which provides that Ms. Nicole Omps, CPA of Beta Consulting shall determine the amounts owed to each
24 class member based on the number of workweeks for each Class Member.

25 9. **Award of Attorney Fees and Costs.** In addition, the Court hereby grants Plaintiff's
26 Motion for Attorney Fees and Costs, and orders Defendants to pay Class Counsel Fifty-Seven Thousand
27 Five Hundred Dollars (\$57,500.00) in attorneys' fees and costs. The Court finds that Class Counsel's
28 requested fees are reasonable and are based upon the actual time expended by Class Counsel in the

1 litigation of this matter. The Court further finds that Class Counsel's requested costs were reasonable,
2 necessary, and actually incurred.

3 10. **Incentive Awards for Settlement Class Representatives.** Pursuant to the terms of the
4 Parties' Settlement Agreement and Plaintiff's Motion, the Court also orders Defendants to pay an
5 Incentive Award to the Settlement Class Representative Jasminka Dubric in the amount of five thousand
6 dollars (\$5,000.00) to be paid from the Settlement Fund. The Court finds that this amount is reasonable
7 and appropriate based upon the services the Settlement Class Representative provided in litigating this
8 matter.

9 11. **Binding Effect.** The terms of the Settlement Agreement and of this Order shall be forever
10 binding on the Settlement Class Representative, all other Class Members and Defendants, as well as their
11 respective heirs, executors, administrators, predecessors, successors, affiliate and assigns. The Persons
12 listed on Exhibit 1 hereto and the individual Intervenors Michael Murray, Michael Reno, Michael Sargeant
13 are excluded from the Class pursuant to request and the Settlement Agreement and are not bound by the
14 terms of the Settlement Agreement or this Order.

15 12. **Releases.** The releases as set forth in paragraph 13 of the Settlement Agreement, together
16 with the definitions contained in paragraph 2 of the Settlement Agreement relating thereto, are expressly
17 incorporated herein in all respects. Accordingly, this Court orders that:

18 a) Except for the obligations and rights created by the Settlement Agreement, and
19 upon Final Approval of the Settlement, the Settlement Class hereby releases and absolutely and forever
20 discharges Defendants A Cab LLC, A Cab Series LLC, Employee Leasing Company, Creighton J. Nady,
21 and their past, present, and future subsidiaries, parent companies, their predecessors in interest and/or
22 ownership, successors in interest and/or ownership, partners, licensees, assignees, managing members,
23 Insurers, including claims under any and all insurance policies, estates, and other affiliates and/or related
24 entities, and each of the foregoing Persons' respective past, present, and future officers, directors,
25 attorneys, shareholders, indemnitees, predecessors, successors, trusts, trustees, partners, associates,
26 principals, divisions, employees, Insurers, any and all insurance policies, members, agents,
27 Representatives, brokers, consultants, heirs, and assigns from any and all Settled Claims.

28 b) The Releasing Parties acknowledge that they are aware that they or their attorneys

1 may hereafter discover claims or facts in addition to or different from those now known or believed to be
2 true with respect to the subject matter of this Agreement and/or the Settled Claims. The Releasing Parties
3 acknowledge that they intend to and will fully, finally, and forever settle and release any and all Settled
4 Claims described herein, whether known or unknown, suspected or unsuspected, which now exist,
5 hereinafter may exist, or heretofore may have existed. In furtherance of this intention, the releases
6 contained in this Agreement shall be and remain in effect as full and complete releases of the Settled
7 Claims by the Releasing Parties without regard to the subsequent discovery or existence of such different
8 or additional claims or facts. Furthermore, upon the expiration of the Claims Period, each and every
9 Releasing Party and all successors in interest shall be permanently enjoined and forever barred from
10 prosecuting any and all Settled Claims against Defendants, A Cab LLC, A Cab Series LLC, Employee
11 Leasing Company, Creighton J. Nady, and their past, present, and future subsidiaries, parent companies,
12 their predecessors in interest and/or ownership, successors in interest and/or ownership, partners,
13 licensees, assignees, managing members, Insurers, including claims under any and all insurance policies,
14 estates, and other affiliates and/or related entities, and each of the foregoing Persons' respective past,
15 present, and future officers, directors, attorneys, shareholders, indemnitees, predecessors, successors,
16 trusts, trustees, partners, associates, principals, divisions, employees, Insurers, any and all insurance
17 policies, members, agents, Representatives, brokers, consultants, heirs, and assigns.

18 13. Notwithstanding paragraph 12 above, nothing in this Order shall bar any action by any of
19 the Parties to enforce or effectuate the terms of the Settlement Agreement or this Order;

20 14. **No Admission.** Neither this Order, nor the Settlement Agreement, nor the negotiation of
21 the Settlement, nor any proceedings taken pursuant thereto:

22 a) Shall be offered against Defendants as evidence of, or construed as, or deemed to
23 be evidence of any presumption, concession or admission with respect to the truth of any fact alleged by
24 the Settlement Class Representative or the validity of any claim that was or could have been asserted or
25 the deficiency of any defense that could have been asserted in this Action or in any litigation ,or of any
26 liability, negligence, fault, or other wrongdoing of any kind; or

27 b) Shall be construed against any of the Releasees as an admission, concession or
28 presumption that the consideration to be given hereunder represents the amount which could be or would

1 have been recovered after trial.

2 15. **Retention of Jurisdiction.** Without affecting the finality of this Order in any way, this
3 Court retains continuing and exclusive jurisdiction over the Parties for purposes of administration,
4 interpretation, implementation and enforcement of the Settlement, disposition of the Settlement Fund, and
5 the Class Members for all matters relating to the Action.

6 16. **Modification of the Settlement Agreement.** Without further approval from the Court,
7 Settlement Class Representative and Defendants are hereby authorized to agree to and adopt such
8 amendments or modifications of the Stipulation or any exhibits attached thereto to effectuate the
9 Settlement that: (i) are not materially inconsistent with this Order; and (ii) do not materially limit the rights
10 of the Class Members in connection with the Settlement. Without further order of the Court, Settlement
11 Class Representatives and Defendants may agree to reasonable extension of time to carry out any
12 provisions of the Settlement. All other modifications or amendments of the Settlement Agreement must
13 be agreed to by all Parties and approved by the Court, in accordance with the terms of the Settlement
14 Agreement.

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17. **Termination.** If the Settlement is terminated as provided in the Settlement Agreement, then this Order (and any orders of the Court relating to the Settlement) shall be vacated, rendered null and void and be of no further force or effect, except as otherwise provided by the Settlement Agreement.

IT IS SO ORDERED.

Dated this 31st day of August, 2021

Robert E. DeLong

Respectfully submitted by:

F3B 729 660B FCB6
Kathleen E. Delaney
District Court Judge

THE BOURASSA LAW GROUP

By: /s/ Valerie S. Gray

MARK J. BOURASSA, ESQ.

Nevada Bar No. 7999

VALERIE S. GRAY, ESQ.

Nevada Bar No. 14716

2350 W. Charleston Blvd., #100

Las Vegas, Nevada 89102

Attorneys for Plaintiffs

Approved as to form by:

RODRIGUEZ LAW OFFICES, P.C.

LEON GREENBERG PROFESSIONAL CORP.

By: Esther C. Rodriguez

ESTHER C. RODRIGUEZ, ESQ.

Nevada Bar No. 6473

10161 Park Run Dr., Suite 150

Las Vegas, Nevada 89145

Attorneys for Defendants

By: NOT APPROVED

Leon Greenberg, Esq.

Nevada Bar No. 8094

2965 S. Jones Boulevard - Ste. E-3

Las Vegas, Nevada 89146

Attorney for the Intervenors

EXHIBIT 1

Persons Excluded from Class Pursuant to Opt-Out Request

1. Richard Clark
440 Golden State St.
Henderson, Nevada 89012

EXHIBIT “B”

IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL MURRAY; AND MICHAEL
RENO, INDIVIDUALLY AND ON
BEHALF OF OTHERS SIMILARLY
SITUATED,

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF NEVADA,
IN AND FOR THE COUNTY OF
CLARK; AND THE HONORABLE
KATHLEEN E. DELANEY, DISTRICT
JUDGE,

Respondents,

and

JASMINKA DUBRIC; A CAB, LLC; A
CAB SERIES LLC; EMPLOYEE
LEASING COMPANY; AND
CREIGHTON J. NADY,
Real Parties in Interest.

No. 75877

FILED

SEP 13 2018

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY S. Young
DEPUTY CLERK

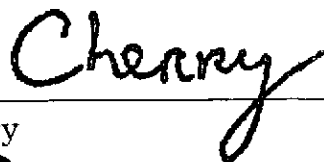
ORDER DISMISSING PETITION FOR WRIT OF MANDAMUS

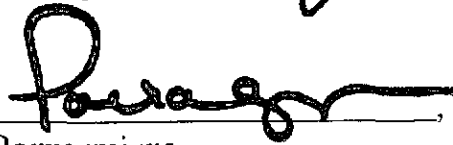
This original petition for a writ of mandamus challenges a district court order denying petitioner class representatives' motion to intervene the underlying competing Minimum Wage Act (MWA) action in which real parties in interest have jointly moved for conditional certification of the same or a similar class for settlement purposes and preliminary approval of a proposed class settlement agreement.


On August 29, 2018, petitioners submitted to this court a declaration and exhibits showing that, on August 21, 2018, the district court entered summary judgment in favor of the class in the MWA action in which

petitioners are representatives.¹ Although petitioners state that they are unsure how the judgment affects their request for writ relief since real parties in interest have not indicated whether they intend to continue pursuing class certification and settlement approval, we conclude that the judgment renders this petition moot and thus we dismiss it without prejudice. In that regard, the final judgment in the competing class action appears to obviate petitioners' reasons for seeking intervention, at least at this time, as the class claims have been resolved and real parties in interest may proceed differently in the underlying case. If petitioners still believe they should be allowed to intervene, they may file a renewed request to do so in district court addressing the change in the status of the class claims, and if denied, they may seek writ relief in this court, if warranted. Accordingly, we

ORDER this petition DISMISSED.


Cherry, J.


Parraguirre, J.


Stiglich, J.

cc: Hon. Kathleen E. Delaney, District Judge
Leon Greenberg Professional Corporation
Rodriguez Law Offices, P.C.

¹We grant petitioners' motion to supplement their petition with the declaration and exhibits attached to the motion.

Bourassa Law Group, LLC
Hutchison & Steffen, LLC/Las Vegas
Eighth District Court Clerk

EXHIBIT "C"

IN THE SUPREME COURT OF THE STATE OF NEVADA

A CAB, LLC; AND A CAB SERIES, LLC,
Appellants,

vs.

MICHAEL MURRAY; AND MICHAEL
RENO, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

Respondents.

No. 77050

FILE

FEB 03 2022

ELIZABETH A. SPORN
CLERK OF SUPREME COURT
BY *[Signature]*
DEPUTY CLERK

ORDER DENYING MOTION

Respondents filed a motion requesting that this court award attorney fees or direct the district court to award attorney fees pursuant to Article 15, Section 16 of Nevada's Constitution, and to include in its mandate upon remand instructions about the allowance of interest, pursuant to NRAP 37(b). Appellants have filed an opposition to the order and respondents have filed a reply.

As an initial matter, this court's opinion already concludes that the district court must reconsider the award of attorney fees in light of this court's decision. Article 15, Section 16, Subsection B of Nevada's Constitution, the Minimum Wage Amendment, states that "[a]n employee who prevails in any action to enforce this section shall be awarded his or her reasonable attorney's fees and costs." However, the determination of a "reasonable" attorney fee involves questions of fact and "should be addressed, in the first instance, by the district court with its greater fact-finding capabilities." *Musso v. Binick*, 104 Nev. 613, 615, 764 P.2d 477, 478 (1988). Accordingly, respondents' motion for an award of attorney's fees on

appeal is denied without prejudice to respondents' right to raise this motion in the district court.

NRAP 37(a) provides that "if a money judgment in a civil case is affirmed, whatever interest is allowed by law is payable from the date when the district court's judgment was entered." NRAP 37(b) provides that if this court "modifies or reverses a judgment with a direction that a money judgment be entered in the district court, the mandate must contain instructions about the allowance of interest."

This court has previously held that an affirmation in part and reversal in part of a money judgment is treated as an affirmation of that judgment for the purposes of NRAP 37 and the calculation of interest. *Schiff v. Winchell*, 126 Nev. 327, 330-31, 237 P.3d 99, 101 (2010). As noted by respondents, this court's opinion issued December 30, 2021, affirmed in part and reversed in part the district court's money judgment but did not include instructions as to any allowance of interest. *Schiff* applies here, and the modification on appeal was, in effect, an affirmation of the original judgment. Therefore, NRAP 37(a) governs the interest on judgments and whatever interest is allowed by law is payable from the date when the district court's judgment was entered. Accordingly, respondent's request for a modification of the mandate to include instructions based on NRAP 37(b) is denied.

The clerk shall issue the remittitur.

It is so ORDERED.

 C.J.

cc: Hon. Kenneth C. Cory, District Judge
Rodriguez Law Offices, P.C.
Cory Reade Dows & Shafer
Hutchison & Steffen, LLC/Las Vegas
Leon Greenberg Professional Corporation
Eighth District Court Clerk

EXHIBIT “D”

LEON GREENBERG, ESQ., Bar No. 8094
RUTHANN GONZALEZ, ESQ., Bar No. 15409
Leon Greenberg Professional Corporation
2965 South Jones Blvd- Suite E3
Las Vegas, Nevada 89146
Tel: (702) 383-6085
Fax: (702) 385-1827
leongreenberg@overtimelaw.com
ranni@overtimelaw.com
Attorneys for *Murray* class intervenors

DISTRICT COURT

CLARK COUNTY, NEVADA

JASMINKA DUBRIC,

Plaintiffs,

VS.

A CAB LLC, a Nevada Limited Liability Company; A CAB SERIES, LLC, EMPLOYEE LEASING COMPANY, a Nevada Series Limited Liability Company, CREIGHTON J. NADY, an individual, and DOES 3 through 20,

Defendants,

and

MICHAEL MURRAY, MICHAEL
RENO, and MICHAEL SARGEANT,
on behalf of a class of judgement
creditors,

Intervenors.

)
)
) Case No. : A-15-721063-C
) Dept. No.: XXV
)
) **ORDER DENYING MOTION**
) **FOR ATTORNEYS' FEES**
) **AGAINST INTERVENORS**
) **AND THEIR COUNSEL LEON**
) **GREENBERG, ESQ.**
)
)
) Hearing Date: October 26, 2021
) Time of Hearing: 9:00 a.m.

1 **ORDER DENYING MOTION FOR ATTORNEYS' FEES AGAINST**
2 **INTERVENORS AND THEIR COUNSEL LEON GREENBERG, ESQ.**

3 This matter having come before the Court for hearing on October 26, 2021
4 and counsel for intervenors and all other parties having appeared, and having
5 considered Plaintiff's Motion for Attorneys' Fees against Intervenors and their
6 Counsel Leon Greenberg, including the opposition and reply filed on the same, and
7 the arguments of all such counsel, and after due deliberation, the Court denies the
8 motion as follows:
9

10 THE COURT FINDS that the Nevada Constitution, Article 15, Section 16
11 provision allowing a prevailing employee to collect attorney fees from an employer
12 is not applicable to intervenors and intervenors' counsel in this matter;
13

14 THE COURT FURTHER FINDS, that the requested award of attorney's
15 fees pursuant to NRS 18.010 cannot be made on the record before the Court as the
16 Court cannot find that intervenors and/or intervenors' counsel made baseless or
17 frivolous claims or made claims to harass the plaintiff.
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Therefore, the motion is DENIED.

IT IS SO ORDERED.

Dated this ____ day of _____, 2021.

Dated this 16th day of November, 2021


Hon. Kathleen Delaney

07B E26 5AAE 4379
Kathleen E. Delaney
District Court Judge

Submitted by:

LEON GREENBERG PROFESSIONAL CORP.

/s/ Leon Greenberg

Leon Greenberg, Esq. NSB 8094
LEON GREENBERG PROFESSIONAL CORP.
2965 S. Jones Boulevard - Ste. E-3
Las Vegas, NV 89146
Tel (702) 383-6085
Attorney for the Intervenors
Approved as to form and content:

By: */s/ Valerie Gray*

Mark J. Bourassa, Esq. NSB 7999
Valerie S. Gray, Esq. NSB 14716
2350 W. Charleston Blvd - Suite 100
Las Vegas, Nevada 89117
Tel (702) 851-2180
Attorney for Plaintiff

By: */s/ Esther C. Rodriguez*

ESTHER C. RODRIGUEZ, ESQ.
NV Bar 006473
RODRIGUEZ LAW OFFICES, P.C.
10161 Park Run Drive.
Suite 150
Las Vegas, NV 89145
Tel: (702) 320-8400
Attorney for Defendants A Cab and Creighton J. Nady

EXHIBIT “E”

1 LEON GREENBERG, ESQ., SBN 8094
2 RUTHANN DEVEREAUX-GONZALEZ, ESQ., SBN 15904
3 Leon Greenberg Professional Corporation
4 2965 South Jones Blvd- Suite E3
5 Las Vegas, Nevada 89146
6 (702) 383-6085
7 (702) 385-1827(fax)
8 leongreenberg@overtimelaw.com

9 CHRISTIAN GABROY, ESQ., SBN 8805
10 Gabroy Law Offices
11 170 S. Green Valley Parkway - Suite 280
12 Henderson Nevada 89012
13 Tel (702) 259-7777
14 Fax (702) 259-7704
15 christian@gabroy.com

16 Attorneys for Plaintiffs

**DISTRICT COURT
CLARK COUNTY, NEVADA**

17 MICHAEL MURRAY, and MICHAEL
18 RENO, Individually and on behalf of
19 others similarly situated,

20 Plaintiffs,

21 vs.

22 A CAB TAXI SERVICE LLC, A CAB
23 SERIES LLC formerly known as A
24 CAB, LLC, and CREIGHTON J.
25 NADY,

26 Defendants.

Case No.: A-12-669926-C

Dept.: 2

ATTORNEY'S DECLARATION

DECLARATION

Leon Greenberg, an attorney duly licensed to practice law in the State of Nevada, hereby affirms, under penalty of perjury, that:

1. I am one of the attorneys representing the plaintiffs in this matter and offer this declaration in support of plaintiffs' response in opposition to defendants' motion on order shortening time filed on February 28, 2022, seeking a stay of this case and plaintiffs' counter-motion for an award of attorney's fees for opposing that motion.

1 2. The current amount owed to the class members in this case, pursuant to
2 the modification of this Court's final judgment of August 21, 2018, directed by the
3 Nevada Supreme Court, is \$686,770.48 to 662 class members, plus post-judgment
4 interest. That is detailed in plaintiffs' motion filed February 14, 2022, to be heard on
5 March 23, 2022. I have calculated post-judgment interest through December 31, 2021,
6 to be in excess of \$146,000, meaning over \$832,000 is owed to those 662 class
7 members. A Cab Series LLC has deposited only \$100,000, held in my attorney
8 IOLTA account pursuant to this Court's Order, as security for that judgment. None of
9 that judgment has been paid. My office is also owed attorneys fees still to be fully
10 determined by the Court but that are now, including attorney's fees owed for post
11 judgment, appellate, and post-appellate work I have performed, well in excess of the
12 Court's previous award of \$568,071 in attorneys fees. My office has also advanced
13 over \$68,000 in expenses in connection with the prosecution of this case. None of
14 those fees or expenses have been paid to my office.

15 3. Based on publicly available information it is apparent that the profits from
16 the taxi cab business operated by A Cab from 2018 through 2021 (four years of
17 operation) were, conservatively, in excess of \$1,500,000 and sufficient to fully satisfy
18 the final judgment. My office has reviewed and compiled the publicly disclosed
19 information on A Cab's taxi fare revenue, as published by the Nevada Taxicab
20 Authority on their website, and as supplemented from freedom of information act
21 requests providing a breakdown of "lease" taxi trip numbers for January 2018 through
22 January of 2022. The publicly released information provides an "average" taxicab fare
23 and a "total" number of such average fares charged per month by A Cab. Multiplying
24 those two numbers results in the total taxicab revenue earned by A Cab for the month.
25 Annexed as Exhibits "1" and "2" to this declaration are tables setting forth that
26 information that my office has prepared. They indicate A Cab's taxi cab fare revenues
27 were at least \$9,374,251 in 2018; \$10,802,726 in 2019; \$4,901,266 in 2020; and
28

1 \$12,099,504 in 2021. Its total taxi cab revenue for that four year period was at least
2 \$37,177,747.

3 4. The Las Vegas Sun on September 27, 2011, reported that the Nevada
4 Taxicab Authority Administrator, Charles Harvey, stated local Las Vegas, Nevada,
5 taxicab companies have an average profit margin of 9.46%. If that was true of A Cab,
6 its profits for the four years 2018-2021 would be over \$3,517,000. If A Cab's profit
7 margin was only one-half of that publicly reported amount (4.73%) its profits for those
8 four years would be in excess of \$1,758,500. I also possess other non-public
9 information, furnished in this case under a protective order, on A Cab's financial
10 history and its profitability in the years prior to 2018. That information also
11 demonstrates A Cab has earned profits in excess of \$1,500,000 during the period from
12 2018 through 2021 and that it can easily satisfy the judgment in this case. I am not
13 allowed to place that information in the public record of these proceedings without a
14 further Order from the Court.

15 5. Opposing defendants' motion for a stay has consumed, as of the date of
16 this declaration, at least 15 hours of my time as recorded in my contemporaneously
17 kept time records. I expect argument of this motion and other work related to it in the
18 future will consume at least another two hours of my time. I am accordingly
19 requesting a fee for 17 hours of my attorney time for opposing this motion.

20 6. The hourly rate (\$400 an hour) upon which I am basing this fee request
21 (\$400 x 17 = \$6,800) is the same rate found by this Court in its order of February 6,
22 2019, to be reasonable for a fee award based on my time expenditures prior to final
23 judgment (at p. 5, l. 5). The Supreme Court also found in its decision that this Court's
24 award of attorney's fees based on that hourly rate was not excessive or performed in an
25 inappropriate manner. 501 P.3d at 975. That hourly rate is also appropriate given my
26 experience and qualifications. I am a 1992 *magna cum laude* graduate of New York
27 Law School where I received the Trustee's Prize for having the highest GPA of all
28

1 graduating evening division students, graduating first in my division and third out of
2 358 day and evening division students. I am a member of the bars of the States of
3 Nevada, California, New York, New Jersey and Pennsylvania and have continuously
4 practiced law full time since 1993. I have appeared as appellate counsel in at least 15
5 cases and orally argued in the Nevada Supreme Court at least 10 times since 2008.
6 That hourly fee amount is also reasonable as I have been awarded fees at the
7 considerably higher rate of \$720 an hour in 2016 by both the Ninth Circuit Court of
8 Appeals for appellate work and by the United States District Court for the District of
9 Nevada. *See, Tallman v. CPS Security*, United States Court of Appeals for the Ninth
10 Circuit, appeal No. 14-16508, Docket 42, Order filed September 8, 2016, and motion
11 granted by such Order and later district court proceedings in that case, 09-cv-944,
12 Order of November 29, 2016.

13
14 I affirm this 4th day of March, 2022, that the foregoing is true and correct under
15 the penalty of perjury.

16
17 /s/ Leon Greenberg
18 Leon Greenberg
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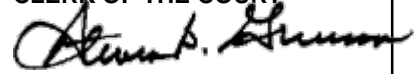
EXHIBIT 1

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
1	MONTH	2020 Trips Per Month	2020 Average Non- lease Fare Per Trip	2020 Non- lease trips per month	2020 Non- lease Trip revenue	2020 Lease Trips Per Month	2020 Average Lease Fare Per Trip	2020 Lease revenue	2020 Total Fare Revenue	2021 Trips Per Month	2021 Average Non- lease Fare Per Trip	2021 Non- lease trips	2021 Non- lease trip revenue	2021 Lease Trips	2021 Average Lease Fare Per Trip	2021 Lease revenue	2021 Fare Revenue
2	Jan	52238	\$16.79	14,124	\$237,142	38114	\$17.91	\$682,622	\$919,763.70	18881	\$17.36	6,586	\$114,333	12295	\$18.25	\$224,384	\$338,716.71
3	Feb	48,224	\$16.97	12,735	\$216,113	35489	\$18.11	\$642,706	\$858,818.74	25035	\$17.92	7,469	\$133,844	17566	\$18.37	\$322,687	\$456,531.90
4	March	22242	\$17.15	7,004	\$120,119	15238	\$18.16	\$276,722	\$396,840.68	47308	\$18.68	11,008	\$205,629	36300	\$18.77	\$681,351	\$886,980.44
5	April	0	\$0.00	0	\$0	0	\$0.00	\$0	\$0.00	62112	\$18.86	12,100	\$228,206	50012	\$18.82	\$941,226	\$1,169,431.84
6	May	0	\$0.00	0	\$0	0	\$0.00	\$0	\$0.00	64475	\$18.33	12,313	\$225,697	52162	\$18.63	\$971,778	\$1,197,475.35
7	June	11572	\$17.67	9,274	\$163,872	2298	\$18.55	\$42,628	\$206,499.48	66711	\$17.71	11,255	\$199,326	55456	\$17.88	\$991,553	\$1,190,879.33
8	July	21840	\$18.11	11,609	\$210,239	10231	\$18.10	\$185,181	\$395,420.09	70470	\$17.32	12,175	\$210,871	58295	\$17.67	\$1,030,073	\$1,240,943.65
9	Aug	21158	\$17.72	10,062	\$178,299	11096	\$18.73	\$207,828	\$386,126.72	65238	\$17.18	11,091	\$190,543	54147	\$17.60	\$952,987	\$1,143,530.58
10	Sept.	25779	\$17.57	10,312	\$181,182	15467	\$17.94	\$277,478	\$458,659.82	58929	\$17.97	10,042	\$180,455	48887	\$18.87	\$922,498	\$1,102,952.43
11	Oct.	29866	\$17.82	8,999	\$160,362	20867	\$18.54	\$386,874	\$547,236.36	71954	\$17.67	11,217	\$198,204	60737	\$18.71	\$1,136,389	\$1,334,593.66
12	Nov	22448	\$17.58	6,821	\$119,913	15627	\$18.87	\$294,881	\$414,794.67	59335	\$17.78	9,596	\$170,617	49739	\$18.54	\$922,161	\$1,092,777.94
13	Dec	17147	\$17.59	5,757	\$101,266	11390	\$18.95	\$215,841	\$317,106.13	51202	\$17.96	7,922	\$142,279	43280	\$18.54	\$802,411	\$944,690.32
14																	
15							Total 2020:		\$4,901,266.39					Total 2021:		\$12,099,504.15	

EXHIBIT 2

A CAB PASSENGER FARE REVENUE 2018 AND 2019 FROM TAXICAB AUTHORITY PUBLIC RECORDS

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
1	Month	2018 Trips Per Month	2018 Average Non- lease Fare Per Trip	2018 Non- lease trips per month	2019 Non- lease trip revenue	2018 Lease Trips Per Month	2018 Average Lease Fare Per Trip	2018 Lease revenue	2018 Total Fare Revenue	2019 Trips Per Month	2019 Average Non- lease Fare Per Trip	2019 Non- lease trips per month	2019 Non- lease revenue	2019 Lease Trips	2019 Average Lease Fare Per Trip	2019 Lease revenue	2019 Fare Revenue
2	Jan	42313	\$16.77	42,313	\$709,589	0	\$0.00	\$0	\$709,589.01	52458	\$16.97	18,494	\$313,843	33964	\$18.82	\$639,202	\$953,045.66
3	Feb	36184	\$16.67	36,184	\$603,187	0	\$0.00	\$0	\$603,187.28	46936	\$16.76	15,636	\$262,059	31300	\$18.82	\$589,066	\$851,125.36
4	March	42535	\$16.66	42,535	\$708,633	0	\$0.00	\$0	\$708,633.10	58575	\$16.88	17,728	\$299,249	40847	\$18.94	\$773,642	\$1,072,890.82
5	April	37203	\$16.70	37,203	\$621,290	0	\$0.00	\$0	\$621,290.10	51767	\$17.04	15,730	\$268,039	36037	\$18.82	\$678,216	\$946,255.54
6	May	43665	\$16.77	35,380	\$593,323	8285	\$17.66	\$146,313	\$739,635.70	55833	\$16.91	16,837	\$284,714	38996	\$18.90	\$737,024	\$1,021,738.07
7	June	47027	\$16.63	21,829	\$363,016	25198	\$17.76	\$447,516	\$810,532.75	47784	\$16.37	14,651	\$239,837	33133	\$18.59	\$615,942	\$855,779.34
8	July	49296	\$16.63	20,956	\$348,498	28340	\$17.42	\$493,683	\$842,181.08	47215	\$16.11	14,487	\$233,386	32728	\$18.06	\$591,068	\$824,453.25
9	August	50880	\$16.46	20,840	\$343,026	30040	\$17.70	\$531,708	\$874,734.40	46025	\$16.06	13,883	\$222,961	32142	\$18.01	\$578,877	\$801,838.40
10	Sept	50895	\$16.88	19,936	\$336,520	30959	\$18.18	\$562,835	\$899,354.30	48898	\$16.26	14,131	\$229,770	34767	\$18.75	\$651,881	\$881,651.31
11	Oct	51573	\$16.88	19,604	\$330,916	31969	\$18.85	\$602,616	\$933,531.17	48315	\$16.55	14,265	\$236,086	34050	\$19.35	\$658,868	\$894,953.25
12	Nov	48424	\$17.05	17,994	\$306,798	30430	\$18.70	\$569,041	\$875,838.70	46871	\$16.49	13,861	\$228,568	33010	\$19.26	\$635,773	\$864,340.49
13	Dec	41826	\$17.13	15,994	\$273,977	25832	\$18.65	\$481,767	\$755,744.02	46263	\$16.64	12,316	\$204,938	33947	\$18.55	\$629,717	\$834,655.09
14																	
15						Total Revenue 2018:			\$9,374,251.61					Total Revenue 2019:			\$10,802,726.58



RIS
Esther C. Rodriguez, Esq.
Nevada Bar No. 6473
RODRIGUEZ LAW OFFICES, P.C.
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
702-320-8400
info@rodriguezlaw.com

Jay A. Shafer, Esq.
Nevada Bar No. 006791
CORY READE DOWS & SHAFER
1333 North Buffalo Drive, Suite 210
Las Vegas, Nevada 89128
702-794-4411
jshafer@premierelegalgroup.com
Attorneys for Defendants

DISTRICT COURT
CLARK COUNTY, NEVADA

MICHAEL MURRAY and MICHAEL RENO,
Individually and on behalf of others similarly
situated,

Plaintiffs,

vs.

A CAB TAXI SERVICE LLC and A CAB, LLC,
and CREIGHTON J. NADY,

Defendants.

Case No.: A-12-669926-C
Dept. No. II

**Hearing: March 9, 2022
9:30 a.m.**

REPLY IN SUPPORT OF DEFENDANTS' MOTION TO STAY

ON ORDER SHORTENING TIME

Defendants hereby respectfully submit this Reply in support of its motion for this Honorable Court to stay these proceedings pending the Order from the Nevada Supreme Court on *Plaintiffs'* appeal in the *Dubric* matter. With their appeal in the *Dubric* matter arguing for a remand, a recusal, and an order from the Nevada Supreme Court to declare that the *Dubric* judgment will have no effect on *Murray*, Plaintiffs have themselves created the compelling reason for the stay.

In their Opposition to staying this case, it is clear they are arguing out of two sides of their

1 mouths and in a contradictory fashion, depending upon the judicial forum. So that this would not
2 become an issue of “he said-she said” and “I never said that,” that is precisely why **Plaintiffs’ own**
3 **words** and opening brief are attached as an exhibit to the moving papers and in support of the stay.

4 This is Plaintiffs’ own work wherein they outright argue that the *Dubric* matter must be
5 stopped in its tracks and that Judge Delaney and her biased ways must be removed from any future
6 interference with the *Murray* matter. [Of course, there has been no finding of bias or wrongdoing by
7 Judge Delaney by either Chief Judge Linda Bell or the Nevada Supreme Court, only the accusations
8 by Plaintiffs.] Plaintiffs then do an about-face in this Court and argue in the Opposition words to the
9 effect, “oh, we don’t care about *Dubric* because it will have no effect on any judgment entered in this
10 Court.” This flip-flop in Plaintiffs’ arguments is completely disingenuous.

11 Plaintiffs argue in their opposition that they made “no such statements” against Judge
12 Delaney, and made “no such arguments” regarding the effect of the *Dubric* matter. These are
13 Plaintiffs’ written statements contained in their brief to the Nevada Supreme Court:

14 **“The parties’ intent, with Judge Delaney’s agreement, to enter into a collusive**
15 **settlement extinguishing the Murray judgment and class claims is**
16 **overwhelmingly clear.** This Court, in any remand to the district court, should also
17 direct that the district court expressly exclude the *Murray* judgment and class member
18 claims from any class action settlement or disposition it enters as part of a final
19 judgment in this case.” *Appellants (Plaintiffs) Opening Brief*, p. 17; attached as
20 Exhibit 1 to Defendants’ Motion to Stay (emphasis added).

21 Plaintiffs proceed to argue to the NSC that Judge Delaney “lacked subject matter jurisdiction to
22 release or settle the claims of the 890 class members that were adjudicated by the *Murray* final
23 judgment and its final judgment purporting to do so is void.” *Appellants (Plaintiffs) Opening Brief*,
24 p. 17.

25 This is clear evidence that Plaintiffs recognize Judge Delaney already entered a final order
26 and resolved specific minimum wage claims of driver claimants. Plaintiffs are arguing to the NSC
27 that the final judgment is void, but the fact remains that a final order has been entered that clearly
28 affects some of the purported class members. Plaintiffs then urge this district court to ignore and to

1 look away from this issue as if it does not exist.

2 Plaintiffs assert to this Court that Judge Delaney's final judgment is void but there is no such
3 order in place indicating this! This is only Plaintiffs' counsel's opinion.

4 Plaintiffs then spend the majority of their brief to the NSC arguing everything that is wrong
5 with the class action settlement reached before Judge Delaney. It remains to be seen whether the
6 NSC will engage in a review and find anything wrong with a settlement reached through negotiation
7 with the assistance of Judge Wiese; the work of an independent CPA; and a review of the transcripts
8 of the hearings addressing the fairness including all of the objections; and the fact that no one chose
9 to opt out after proper notice. But what is important to this Court is not to ignore what Plaintiffs
10 have initiated before the Nevada Supreme Court, but for the district court to await the guidance
11 which will be issued.

12 **1. Plaintiffs' brief to the NSC acknowledges that Dubric has already released, modified,**
13 **and settled some rights and obligations of the present claimants, but seeks to reverse the**
14 **effect.**

15 Plaintiffs here argue in the very first section of their Opposition to a stay, that the claims here
16 against A Cab Series LLC have been resolved and "will not be altered by the Dubric proceedings and
17 appeal." Opposition, p. 2. Yet, they argue contrarily to the Nevada Supreme Court: "The district
18 court [Judge Delaney] lacked subject matter jurisdiction to release, modify, or settle, any rights or
19 obligations arising from the Murray judgment." *Appellants (Plaintiffs) Opening Brief*, p. 19
20 (emphasis added).

21 In their appeal, Plaintiffs seek to reverse and to overturn the final approval and entry of
22 judgment, but the fact is that it is presently in place. Accordingly, if this Court is not inclined to stay
23 proceedings, it must at the minimum entertain all of the evidence of those claimants who have
24 resolved their cases and should not be included in a future judgment here.

25 **2. Plaintiffs' misrepresentations to this Court are astounding.**

26 Plaintiffs argue to this Court that they have been falsely accused of making statements:
27 "Defendants' motion makes an ad hominem attack on plaintiffs' counsel by falsely accusing it of 'a
28 barrage of character attacks' and a 'personal attack' against Judge Delaney and falsely accusing such

counsel of alleging she was ‘colluding with both parties in approving the Dubric class settlement.’ Motion, p. 3, l. 19-20, p. 4, l.20. Plaintiffs’ counsel have made no such “collusion” accusation or “character” or “personal attack.” Opposition, p. 5:8-13. They argue, “defendants cite no actual materials supporting such assertions”.

So here is a small sampling from the Plaintiffs’ Opening Brief:

- “The district court’s [referring to Judge Delaney] approval of an indisputably collusive class action settlement was not the product of mere error or neglect; recusal or other restriction on post-remand proceedings should be imposed.” *Request for removal of Judge Delaney contained in Appellants (Plaintiffs) Opening Brief*, p. 17; attached as Exhibit 1 to Defendants’ Motion to Stay.
- “The district court’s dereliction of its duty went far beyond a failure to examine the proposed class action settlement.” *Id.*
- “The district court was willfully blind”; *Id.*, p 31.
- “The district court purposefully ignored Dubric and her counsel’s collusion with A Cab.” *Id.*, p 31.
- “Judge Delaney’s conduct was not just erroneous, it improperly facilitated the wrongful goals of A Cab.” *Id.*, p. 37.

3. Plaintiffs cannot refute the elements supporting a stay.

Defendants have demonstrated that they are likely to prevail on the merits of appeal. There is no indication that Plaintiffs even have standing to interfere and to appeal a separate case that was resolved between other parties. This is an unusual situation in that Plaintiffs have initiated the appeal because they want a reversal of that separate judgment they know presently affects this case. Yet, they want to rush entry of a new judgment here because they know that once funds are paid out from Defendants to individual drivers in *Murray*, the chance of recovering any overpayments from these individual cab drivers would be impossible. Of course, it is foreseeable that Plaintiffs’ counsel would wash their hands of any obligations to try to collect overpayments to repay defendants. This is the irreparable harm that will be caused to Defendants by not staying entry of this matter and causing duplicative payments to claimants who have settled their claims.

1 Plaintiffs' argument of the irreparable harm to them is weak. They state only that no million
2 dollar supersedeas bond has been posted. This Court has repeatedly determined that the bond was
3 not required and that sufficient funds were already in the Plaintiffs' trust account. The most recent
4 determination was issued by Hon. Rob Bare who determined that any doubt as to these issues would
5 be determined by a Special Master with both parties to share in his cost. **Exhibit 1**. Plaintiffs have
6 never complied with that Order and thus the Special Master did not prepare his report. They cannot
7 now cry that there is no bond in place, as there was a mechanism this Court set in motion to
8 determine the necessity of any such bond or security. Plaintiffs are in open contempt of this Court
9 order.

10 Further circumstances have supported that there is adequate security already in place.
11 Plaintiffs' counsel presently holds upwards of \$300,000.00 in his trust account; Defendants have
12 already paid more than \$139,000.00 to the Department of Labor as minimum wage payments; and
13 Defendants have already paid more than \$224,500.00 as payments to drivers in the *Dubric*
14 settlement. Accordingly, more than **\$663,500.00** has been paid already towards minimum wage
15 payments or is being held by Plaintiffs' counsel. There is no indication that the final judgment in
16 this matter will be anywhere near that number once the Court considers the claims which have been
17 stricken by the statute of limitations as well as the offsets. But assuming on the best day possible for
18 Plaintiffs, by their own Exhibit G to the Court requesting entry of a new judgment, their number
19 (\$598,542.81) is less than what has already been paid. Exhibit G, p. 1 of Plaintiffs' Motion for
20 modified judgment, attached hereto as **Exhibit 2**.

21 Defendants have clearly met the factors as outlined in *Dollar Rent a Car of Washington v.*
22 *The Travelers Indemnity Company*, 774 F.2d 1371 (1985), and supporting the need for a stay.
23 The party requesting the stay has shown it would sustain irreparable injury absent the stay order.
24 Plaintiffs have not shown the issuance of a stay order will substantially harm them. Those who did
25 not opt out of *Dubric* will continue to receive payments. The public interest lies in the granting of a
26 stay.

27 ...

28 ...

II.

CONCLUSION

Based upon the foregoing points and authorities, Defendants respectfully requests this Honorable Court stay the proceedings in this matter pending guidance from the Nevada Supreme Court on Plaintiffs' appeal in Nevada Supreme Court Case No. 83492. If this Court is not inclined to grant a stay, it must at the minimum entertain all of the evidence of those claimants who have resolved their cases and should not be included in a future judgment here.

In its Order Shortening Time, this Court did not authorize Plaintiffs to file a Countermotion. If this Court is inclined to hear said countermotion, Defendants seek leave to file an opposition to be briefed in full.

DATED this 8th day of March, 2022.

RODRIGUEZ LAW OFFICES, P. C.

/s/ Esther C. Rodriguez, Esq.
Esther C. Rodriguez, Esq.
Nevada State Bar No. 006473
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 8th day of March, 2022, I electronically filed the foregoing with the Eighth Judicial District Court Clerk of Court using the E-file and Serve System which will send a notice of electronic service to the following:

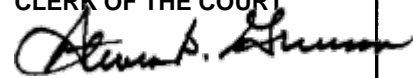
Leon Greenberg, Esq.
Leon Greenberg Professional Corporation
2965 South Jones Boulevard, Suite E4
Las Vegas, Nevada 89146

Christian Gabroy, Esq.
Gabroy Law Offices
170 South Green Valley Parkway # 280
Henderson, Nevada 89012
Co-Counsel for Plaintiffs

/s/ Susan Dillow
An Employee of Rodriguez Law Offices, P.C.

EXHIBIT 1

EXHIBIT 1



ORDR

Esther C. Rodriguez, Esq.
Nevada Bar No. 6473
RODRIGUEZ LAW OFFICES, P.C.
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
702-320-8400
info@rodriguezlaw.com

Michael K. Wall, Esq.
Nevada Bar No. 2098
Hutchinson & Steffen, LLC
10080 West Alta Drive, Suite 200
Las Vegas, Nevada 89145
702-385-2500
mwall@hutchlegal.com

Jay A. Shafer, Esq.
Nevada Bar No. 006791
CORY READE DOWS & SHAFER
1333 North Buffalo Drive, Suite 210
Las Vegas, Nevada 89128
702-794-4411
jshafer@crdslaw.com
Attorneys for Defendants

DISTRICT COURT

CLARK COUNTY, NEVADA

MICHAEL MURRAY and MICHAEL RENO,
Individually and on behalf of others similarly
situated,

Plaintiffs,

vs.

A CAB TAXI SERVICE LLC and A CAB, LLC,

Defendants.

Case No.: A-12-669926-C
Dept. No. XXXII

**ORDER DENYING PLAINTIFFS' MOTION TO ALLOW JUDGMENT ENFORCEMENT;
PLAINTIFFS' MOTION TO DISTRIBUTE FUNDS HELD BY CLASS COUNSEL; AND
PLAINTIFFS' MOTION REQUIRING THE TURNOVER OF CERTAIN PROPERTY OF
THE JUDGMENT DEBTOR PURSUANT TO NRS 21.320; AND ORDER GRANTING
DEFENDANTS' COUNTERMOTION FOR STAY OF COLLECTION ACTIVITIES**

Plaintiffs' Motion to Allow Judgment Enforcement; Motion to Distribute Funds Held by

1 *Class Counsel; and Plaintiffs' Motion Requiring the Turnover of Certain Property of the Judgment*
2 *Debtor Pursuant to NRS 21.320* were filed on October 3, 2019. Defendants' *Oppositions* to said
3 motions and *Countermotion for Stay of Collection Activities* were filed on October 23, 2019. The
4 hearings on these motions and the countermotion were held on November 12, 2019 and December 3,
5 2019. Plaintiffs were represented at the hearings by their attorneys, Leon Greenberg and Dana
6 Sniegocki of Leon Greenberg Professional Corporation. Defendants were represented at the hearings
7 by their attorneys, Esther C. Rodriguez of Rodriguez Law Offices, P.C., Michael K. Wall, of
8 Hutchison Steffen, and Jay A. Shafer of Cory Reade Dows & Shafer. Also present at the hearing of
9 December 3, 2019, was Steven J. Parsons, Esq. on behalf of Special Master George C. Swarts.

10 Plaintiffs' *Motion to Allow Judgment Enforcement* requested an Order from the Court
11 granting them leave to handle in their sole discretion without any further order from the Court nor
12 challenge by Defendants on procedural grounds, collection of the judgment for \$614,599.07; as well
13 as an order to receive Defendants' information from Special Master Swarts, previously deemed
14 confidential by the Court, in order to utilize such information to execute upon assets to satisfy their
15 judgment.

16 In response and in opposition, Defendants argued that Plaintiffs' request is in contravention
17 to the NRCP and NRS which provide for due process and rights to object to seizures and collection
18 activities. Defendants also asserted that Plaintiffs are not entitled to confidential materials ordered
19 by the Court for other purposes, not for purposes of facilitating Plaintiffs' collection activities.

20 Defendants' *Countermotion for Stay of Collection Activities Pending Appeal* moved the
21 Court for a stay of Plaintiffs' collection activities. In support of said request, Defendants offered
22 additional security consisting of another \$100,000 to be deposited to Plaintiffs' counsels' trust
23 account (increasing the deposit to \$303,494.54), as well as a proposal to maintain corporate
24 transparency with the Special Master to insure no improper transfers were made which would
25 jeopardize Plaintiffs' judgment.

26 Plaintiffs' *Motion Requiring the Turnover of Certain Property* requested the seizure of
27 certain motor vehicles alleged to be owned by the taxicab company. Defendants opposed this motion
28 as the same requested relief had previously been denied; and EDCR 7.12 bars multiple application.

1 Defendants also opposed the seizure of income-generating assets.

2 Plaintiffs' *Motion to Distribute Funds Held by Class Counsel* requested authority to
3 distribute the funds held in the trust account of Plaintiffs' counsel. Defendants opposed this motion
4 arguing that said funds were improperly taken and declaratory relief pertaining to these funds is
5 pending in another court; the Court does not have subject matter jurisdiction over these claims; and
6 the Plaintiffs' proposed plan for distribution does not further the stated goals of the Court.

7 The Court reviewed the briefing; entertained argument from both Plaintiffs and Defendants;
8 as well as heard from counsel for Special Master Swarts (Mr. Swarts was unavailable due to personal
9 family issues). Mr. Parsons indicated to the Court that Mr. Swarts was definitely of the opinion that
10 any significant shifting of capital or assets away from the business, threatened the existence of the
11 business. Further, Mr. Parsons indicated to the Court that at the time of the Special Master's analysis
12 and reporting, the posting of a supersedeas bond was not within the capacity of A Cab, but no
13 information was available to confirm the current financial ability to do so.

14 The Court, having read all the pleadings and papers on file herein, hearing the arguments of
15 the parties, and good cause appearing, finds that a limited stay is warranted and appropriate.
16 Accordingly, Plaintiffs will be permitted to conducted discovery that would be appropriate in a post-
17 judgment scenario, but actual collection activity will be stayed. The Court recognizes that the taking
18 of assets or monies in a collection sense could cripple the business and put it out of business, which
19 is not the desired outcome.

20 Accordingly, the Court **DENIES** Plaintiffs' *Motion Requiring the Turnover of Certain*
21 *Property of the Judgment Debtor Pursuant to NRS 21.320*.

22 The Court finds that at this stage there are two main objectives: those being to keep the
23 company going and to secure the judgment should Defendants lose their appeal to the Nevada
24 Supreme Court. As such, the Court finds that it is appropriate to reactivate the role of Special Master
25 Swarts to further analyze the corporate records of Defendant in order to report to the Court what, if
26 any, percentage of profits could be segregated as a further security while the appeal proceeds. It is
27 apparent to the Court that Defendants cannot post a supersedeas bond for the approximately \$1.4
28 million; and therefore the Court cannot grant a stay for all purposes on everything, because

1 Defendants are without means to post the entirety of the bond at this point. However, the Court finds
2 that Defendants have posted a partial security which will soon exceed \$300,000, and that a limited
3 stay is appropriate.

4 The Plaintiffs will maintain this security deposit as well as any future security deposits in the
5 trust account of Plaintiffs' counsel. The Court recognizes that disbursement of these funds offered as
6 security was not appropriate as it would be impossible to recover said funds distributed to hundreds
7 of class members in small amounts, in the event that Defendants prevail in their appeals.

8 Accordingly, the Court **DENIES** Plaintiffs' *Motion to Distribute Funds Held By Class*
9 *Counsel*.

10 **IT IS HEREBY ORDERED** that:

- 11 1. *Plaintiffs' Motion To Allow Judgment Enforcement* is **DENIED**;
- 12 2. *Plaintiffs' Motion To Distribute Funds Held By Class Counsel* is **DENIED**;
- 13 3. *Plaintiffs' Motion Requiring The Turnover of Certain Property of The Judgment*
14 *Debtor Pursuant to NRS 21.320* is **DENIED**; and
- 15 4. *Defendants' Countermotion For Stay of Collection Activities* is **GRANTED**.

16 **FURTHER THE COURT ORDERS:**

17 The Court-appointed Special Master, George Swarts, will be re-activated to provide
18 additional information to the Court to address what, if any, percentage of Defendant's profits could
19 be segregated as a further security while the appeal proceeds.

20 The Court will set a status check in light of the present circumstances created by the COVID-
21 19 pandemic including the closure of non-essential businesses including the Defendants' business, to
22 determine a realistic date to accomplish a report by the Special Master.

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The Court further instructs the parties to provide additional briefing as to whether the additional fees incurred by the Special Master should be borne equally between the parties. Plaintiffs' response on this issue is due December 17, 2019; and Defendants' response is due December 31, 2019. After reviewing the briefs, the Court ORDERS that Special Master's fees shall be equally borne by the parties.

DATED this 17th day of July, 2020.


DISTRICT COURT JUDGE
ROB BARE


HGL

Submitted by:

RODRIGUEZ LAW OFFICES, P.C.

Approved as to form and content:

LEON GREENBERG PROFESSIONAL
CORPORATION


ESTHER C. RODRIGUEZ, ESQ.
Nevada State Bar No. 6473
RODRIGUEZ LAW OFFICES, P.C.
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Attorneys for Defendants


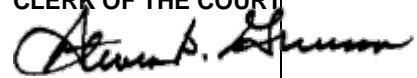

LEON GREENBERG, ESQ.
Nevada Bar No.: 8094
2965 South Jones Boulevard, Suite E3
Las Vegas, Nevada 89146
Attorneys for Plaintiffs

EXHIBIT 2

EXHIBIT 2

	A	B	C	D	E	F	G	H
1		Totals for All Class Members		\$598,542.81	\$88,227.67	\$686,770.48	\$670,111.05	(\$71,568.24)
2	Employee			Total Lower Tier Minimum Wages Owed 10/8/2010 - 12/31/2015 After Set Off and Over	Interest from 1/1 2016 through 6/30/2018	Total with Interest	Total 10/8/2010 - 12/31/2015 Shortage	Set Off from USDOL Settlement
3	Number	Last Name	First Name	10.00	6/30/2018	Interest	Shortage	Settlement
4	3861	Abarca	Enrique	\$815.12	\$120.15	\$935.27	\$815.12	\$0.00
5	3638	Abdella	Juhar	\$178.63	\$26.33	\$204.96	\$319.03	(\$140.40)
6	105408	Abdulle	Abdirashid	\$165.36	\$24.38	\$189.74	\$165.36	\$0.00
7	3606	Abebe	Tamrat	\$3,010.66	\$443.78	\$3,454.44	\$3,010.66	\$0.00
8	3302	Abraha	Tesfalem	\$411.83	\$60.70	\$472.53	\$411.83	\$0.00
9	105813	Abt	Daniel	\$891.35	\$131.39	\$1,022.74	\$891.35	\$0.00
10	2640	Abuel	Alan	\$26.99	\$3.98	\$30.97	\$259.30	(\$232.31)
11	3513	Abuhay	Fasil	\$199.88	\$29.46	\$229.34	\$390.89	(\$191.01)
12	100221	Ackman	Charles	\$385.21	\$56.78	\$441.99	\$385.21	\$0.00
13	3853	Acosta	Lorrie	\$135.08	\$19.91	\$154.99	\$135.08	\$0.00
14	3609	Adamian	Robert	\$794.61	\$117.13	\$911.74	\$995.17	(\$200.56)
15	3896	Adams	Michael	\$193.46	\$28.52	\$221.98	\$283.69	(\$90.23)
16	3641	Adamson	Nicole	\$1,012.32	\$149.22	\$1,161.54	\$1,306.43	(\$294.11)
17	25411	Adhanom	Tewoldebrhan	\$124.16	\$18.30	\$142.46	\$124.16	\$0.00
18	3846	Agacevic	Ibnel	\$299.99	\$44.22	\$344.21	\$299.99	\$0.00
19	100821	Agostino	Nicholas	\$1,436.35	\$211.72	\$1,648.07	\$1,436.35	\$0.00
20	3684	Ahmed	Ahmed	\$926.12	\$136.51	\$1,062.63	\$1,290.23	(\$364.11)
21	3678	Alemayehu	Tewodros	\$42.09	\$6.20	\$48.30	\$42.09	\$0.00
22	3692	Alessi	Anthony	\$13.62	\$2.01	\$15.63	\$13.62	\$0.00
23	3712	Alexander	Darvious	\$63.13	\$9.30	\$72.43	\$63.13	\$0.00
24	3869	Alfaro	Joe	\$300.71	\$44.33	\$345.03	\$300.71	\$0.00
25	3661	Ali	Abraham	\$2,224.87	\$327.95	\$2,552.82	\$2,224.87	\$0.00
26	104525	Allegue	Yusnier	\$1,414.77	\$208.54	\$1,623.31	\$1,414.77	\$0.00
27	2903	Allen	Otis	\$6,359.32	\$937.39	\$7,296.71	\$6,359.32	\$0.00
28	25979	Alnaif	Abdul	\$711.15	\$104.83	\$815.98	\$743.50	(\$32.35)
29	3787	Altamura	Vincent	\$503.89	\$74.28	\$578.17	\$503.89	\$0.00
30	103822	Alvarado	Santiago	\$94.08	\$13.87	\$107.95	\$94.08	\$0.00
31	3769	Alves	Mary	\$988.61	\$145.72	\$1,134.33	\$988.61	\$0.00
32	3645	Ameha	Samuale	\$244.82	\$36.09	\$280.91	\$244.82	\$0.00
33	24038	Anantagul	Kamol	\$154.39	\$22.76	\$177.15	\$154.39	\$0.00
34	3564	Anastasio	James	\$111.24	\$16.40	\$127.63	\$111.24	\$0.00
35	29709	Andersen	Jason	\$1,197.51	\$176.52	\$1,374.03	\$1,968.47	(\$770.96)
36	106828	Anderson	Calvin	\$1,353.44	\$199.50	\$1,552.95	\$1,353.44	\$0.00
37	3672	Anderson	Roosevelt	\$2,114.65	\$311.71	\$2,426.36	\$2,787.37	(\$672.72)
38	3943	Anderson	William	\$289.40	\$42.66	\$332.06	\$289.40	\$0.00
39	3650	Anif	Janeid	\$1,406.55	\$207.33	\$1,613.88	\$1,406.55	\$0.00
40	2942	Appel	Howard	\$23.47	\$3.46	\$26.93	\$23.47	\$0.00
41	3614	Applegate	Angela	\$260.97	\$38.47	\$299.44	\$319.42	(\$58.45)
42	3730	Arar	Isam	\$1,726.82	\$254.54	\$1,981.36	\$2,235.96	(\$509.14)
43	104910	Archer	Bert	\$362.37	\$53.41	\$415.78	\$362.37	\$0.00
44	3709	Arell	Roger	\$42.41	\$6.25	\$48.66	\$92.02	(\$49.61)
45	3931	Arena	Francis	\$527.13	\$77.70	\$604.83	\$527.13	\$0.00



1 RTRAN

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5 DISTRICT COURT
6 CLARK COUNTY, NEVADA

7
8 MICHAEL MURRAY,
9 Plaintiff,

CASE#: A-12-669926-C
DEPT. II

10 vs.

11 A CAB TAXI SERVICE LLC,
12 Defendant,

13
14 BEFORE THE HONORABLE CARLI L. KIERNY, DISTRICT COURT JUDGE
15 WEDNESDAY, MARCH 9, 2022

16 **RECORDER'S TRANSCRIPT OF HEARING:**
17 **DEFENDANT'S MOTION TO STAY ON OST**

18 APPEARANCES:

19 For the Plaintiff:

LEON GREENBERG, ESQ.
RUTHAN GONZALEZ, ESQ.

20
21 For Defendants:
Creighton J. Nady

ESTHER C. RODRIGUEZ, ESQ.
[via videoconference]
JAY A. SHAFER, ESQ.
[via videoconference]

22 A Cab Taxi Service LLC

23
24
25 RECORDED BY: JESSICA KIRKPATRICK, COURT RECORDER

PA 1265

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Las Vegas, Nevada, Wednesday, March 9, 2022

[Case called at 10:22 a.m.]

THE COURT: Let's call page 2, Murray versus A Cab, A669926.

MR. GREENBERG: Good morning, Your Honor, Leon Greenberg with Ruthann Gonzalez for plaintiffs.

THE COURT: Okay.

MS. RODRIGUEZ: Good morning, Your Honor, Esther Rodriguez for the defendants.

THE COURT: All right.

MS. RODRIGUEZ: And I believe Mr. Shafer is present. There he is.

MR. SHAFER: Yes. Jay Shafer.

THE COURT: Okay. Thank you, everyone, for making your appearances. This is on for defendant's motion to stay on an order shortening time regarding the resolution of the, as it's been termed, the *Dubric* case by the Nevada Supreme Court.

Ms. Rodriguez, it was your motion. Are you going to argue this or is Mr. Shafer?

MS. RODRIGUEZ: I am, Your Honor.

THE COURT: Okay. Go ahead.

MS. RODRIGUEZ: Well briefly, Your Honor, hopefully the Court received my reply which was filed yesterday according to the Court's order shortening time.

1 THE COURT: Yes.

2 MS. RODRIGUEZ: I appreciate the Court hearing this on
3 ordering shortening time. I'll be brief in summarizing the large points in
4 our request. Our motion is basically arising from the appeal that was filed
5 by the plaintiffs in this matter in the *Dubric* case, as Your Honor
6 mentioned. That's Nevada Supreme Court 83492. That is a separate
7 class action minimum wage case that was settled back in 2016 under
8 Judge Delaney with the assistance of Judge Weise. And after 5 years of
9 additional hearing on the fairness, the objections, Judge Delaney did enter
10 a final approval back in August, August 31st of 2021.

11 And in my reply, which I submitted to the Court yesterday, I
12 quoted directly out of Mr. Greenberg's opening brief to the Nevada
13 Supreme Court. This is page 17 of his opening brief which was attached
14 as Exhibit 1 to our motion. And Mr. Greenberg has basically asked the
15 Supreme Court, he says that he -- the Court should direct the District
16 Court, which is Judge Delaney, expressly exclude the Murray judgment
17 and class member claims from any class action settlement or disposition it
18 enters as part of the final judgment in the case.

19 He argues on that same page 17, that Judge Delaney didn't
20 have the authority to release or settle the claims of his 890 class members
21 that were adjudicated in the Murray matter. So I think that this is quite
22 clear that he has gone to the Supreme Court and argued a number of
23 reasons as to why Judge Delaney's final order, final judgment, there's a
24 lot of things wrong with it, per him. But then he has turned around in this
25 court and asked this court to ignore that large issue. So we believe that a

1 stay is appropriate until we get some guidance, a decision from the
2 Supreme Court on this major issue before this Court attempts to move
3 forward and ignore that and enter a judgment. And so at that minimum, a
4 stay is appropriate but otherwise the Court does need to consideration of
5 those claims that have been resolved.

6 I briefed the elements that are -- that for the courts
7 consideration under the *Dollar Rent-a-Car v. Travelers*. There will be
8 irreparable harm to the defendants if we -- if A Cab has to pay out
9 duplicative payments for people who have already resolved. You can --
10 the Court can imagine it'd be very difficult to try to recover any duplicative
11 payments to individual cab drivers. These are very small amounts and
12 there is no harm to the plaintiffs, as I detailed, the defendants have
13 already paid out more than \$663,500 towards minimum class action
14 claims, \$300,000 which is being held by Mr. Greenberg. And by his own
15 calculations for a modified judgment, his figure is lower than has already
16 been paid.

17 And then as Your Honor -- as a briefed in the motion, we
18 believe there's a strong likelihood to prevail in the appeal. We don't even
19 believe that Mr. Greenberg's intervenors and objectors have standing to
20 file this appeal to the Supreme Court. So if that's the case that'll be an
21 issue that is resolved quickly and we can move forward in this case, Your
22 Honor. Thank you.

23 THE COURT: All right. Thanks, Ms. Rodriguez.

24 Mr. Greenberg.

25 MR. GREENBERG: Yes, Your Honor. Fundamentally we have

1 a problem here in that there's a request for a stay and there's no
2 substantiation of any basis for the stay. There are these allegations that
3 the *Dubric* judgment would, if sustained on appeal, would somehow impair
4 the judgment in this case against A Cab Series, LLC. It cannot, Your
5 Honor. I mean, we had proceedings brought in *Dubric*. There was the
6 *Dubric* mandamus proceedings in 2018. I attached the order at Exhibit B
7 of my response.

8 The Supreme Court terminated those proceedings before the
9 *Dubric* final judgment took place, saying that well there's a final judgment
10 in this case so we don't need to be concerned with an interference in
11 *Dubric* in respect to the judgment against A Cab Series LLC or before it
12 was A Cab LLC, the name was changed. The Supreme Court's
13 December opinion in this case was very extensive, Your Honor.

14 THE COURT: Yes.

15 MR. GREENBERG: It talked about how it was a complicated
16 case, numerous times. Your Honor, is thoroughly familiar with the case
17 from personal experience. Judge Cory was on this for years. He did
18 make an error in respect to this award of damages for this earlier time
19 period. The judgement needs to be reduced by that amount.

20 But the judgment has been continuously in place since 2018
21 when it was rendered. And in February, just last month when we had this
22 post appeal motion to the Supreme Court, they reiterated that and I gave
23 Your Honor the order from the Supreme Court on that point as well. They
24 said we have affirmed the portion of the judgment that is not modified. So
25 there's been a continuous final judgment in this case against A Cab

1 Series, LLC since August of 2018. Nothing in *Dubric* can change that.

2 I have a need to appeal the *Dubric* judgment, because the
3 *Dubric* judgment purports to release other parties such as Mr. Nady, who
4 is a defendant in this case against whom there is no final judgment in this
5 case, and associates of A Cab Series, LLC which is the judgment debtor.
6 If I did not appeal the *Dubric* judgment it's not clear what the impact of that
7 judgment would be. And I did explain this in my response, Your Honor.
8 So I'm really just repeating what's already in my response here.

9 To the extent that there was a basis for a stay, we need our
10 interest protected. There should be a bond posted here. They're not
11 offering to post a bond. I heard Ms. Rodriguez say that we have \$300,000
12 in my trust account; \$200,000 or \$220,000 of that was not actually posted
13 as a bond. That was seized in a judgment execution which is discussed
14 actually in the opinion by the Supreme Court from December and is still
15 subject to a further evidentiary hearing, which the defendants have not
16 demanded as yet in this case. If they're conceding that money is held
17 properly as security against the judgment they should concede that. They
18 have not, Your Honor. So that's a factual issue that's not accurately
19 reflected to the Court.

20 And again, the judgment here currently stands at about
21 \$800,000 with interest. Interest on the judgment is running about \$5,000
22 a month, Your Honor. So we have, on the 23rd, motions before Your
23 Honor relating to conforming the judgment amount to comply with the
24 Supreme Court's modification and to move forward at that point.

25 I don't want to just repeat what's already before the Court. Your

1 Honor seems to have reviewed everything. I'm not getting any questions
2 from the Court, so let me not take up my time unnecessarily. But I think
3 you can understand, Your Honor, this case is 10 years old almost. We've
4 waiting 3 ½ years for my clients to be paid their minimum wages. There's
5 been a filed adjudication here.

6 I don't like to take issue with defendant's counsel. She's doing
7 her job. I understand that, Your Honor. But the posture of defendant here
8 is simply to litigate these matters and to obstruct the process of collection
9 here, which is why I asked in my counter-motion for an award of attorney's
10 fees. We're just getting motions filed. There's a motion on the 23rd for a
11 declaratory judgment that purports to somehow modify the liability from
12 the Supreme Court. So what's going on here is there's just a process
13 that's being used to consume my time and to make collection of this
14 judgment more time consuming, more onerous for the plaintiffs.

15 And you've heard enough from me, Your Honor. If you have
16 questions, I mean, I would like to assist the Court.

17 THE COURT: So there's just this sort of fundamental issue
18 here of you're arguing now that the *Dubric* settlement has nothing to with
19 this case, it has nothing to do with the issues that are going to be in front
20 of me next week or two weeks from now. But ultimately in the opening
21 brief of that, there's -- in the opening brief of the *Dubric* case that you had
22 filed, there's arguments ultimately that that judgment could affect the
23 parties involved in this case. Am I oversimplifying that?

24 MR. GREENBERG: You are, Your Honor.

25 THE COURT: Okay. Go ahead.

1 MR. GREENBERG: And you're being misled by defendant's
2 arguments. What we said -- we told the Supreme Court is that the *Dubric*
3 judgment lacks subject matter jurisdiction over the claims against A Cab
4 Series, LLC. It's void for lack of subject matter jurisdiction. If we never
5 appealed it, Your Honor, Your Honor could not apply that judgment over
6 the existing final judgment in this case. It is void ab initio.

7 There has been no explanation offered by defendant's counsel
8 now in these motion briefings or before Judge Delaney in the *Dubric*
9 proceedings, or by Judge Delaney in her order, or at the hearings she
10 conducted where I appeared as to how *Dubric* can possibly assert subject
11 matter jurisdiction in that case to modify or affect what was decided and
12 incorporated in the August 2018 final judgment in this case.

13 As I was explaining to Your Honor, the significance of the
14 *Dubric* judgment from my perspective is that it purports to potentially
15 release other parties. My clients have alter ego claims against Mr. Nady
16 in this case, which have been severed but await potential disposition. We
17 also have another action pending involving fraudulent conveyances. And
18 the *Dubric* judgment purports to release all claims and class members
19 against those people who are not subject to the final judgment in this
20 case. So it is not clear what the impact of that would be.

21 I believe *Dubric* did not have subject matter jurisdiction over
22 those claims either, Your Honor. But that's less clear --

23 THE COURT: But if the Supreme decides that it did, then we're
24 in a situation where the defendants here, one of your major defendants
25 here, is affected. Is that accurate?

1 MR. GREENBERG: That would be so, Your Honor, but I'm not
2 concerned with that at this point.

3 THE COURT: Okay.

4 MR. GREENBERG: I'm concerned with the final judgment
5 against A Cab Series, LLC, which was affirmed by the Supreme Court in
6 December. That is the only party that -- final judgment's been rendered
7 against, which is now about \$830,000 with post judgment interest. That
8 judgment is not going to be affected as to that party. And if we collect that
9 judgment from that party, we are unconcerned with the claims against Mr.
10 Nady and against the recipients of the fraudulent conveyances, which are
11 subject to a separate litigation which is currently stayed, Your Honor.

12 So again, we need to focus on what's at issue within the final
13 judgment that was rendered by this Court.

14 THE COURT: Okay.

15 MR. GREENBERG: This Court only rendered a final judgment
16 in August of 2018 against A Cab Series LLC. The Supreme Court
17 thoroughly reviewed this and went through all of the objections to this
18 judgment and modified in one respect. It is reduced by approximately a
19 third, Your Honor, otherwise it fully sustained it. And we need to proceed
20 with that final judgment. That final judgement -- I mean, the *Dubric*
21 judgment can't impair that judgment. It can only be impaired by that
22 appeal which is now resolved. So there was no subject matter jurisdiction
23 in respect to that issue.

24 Again, I know there are other defendants. There are other
25 potentially liable parties. That's got nothing to do with the motion to today.

1 It's got nothing to do with the judgment that was rendered in this court.

2 And again, Your Honor, if Your Honor for some reason was
3 inclined to grant a stay, and I don't see why it should, they say there's no
4 irreparable harm to the plaintiffs, Your Honor, we've waited 10 years, 3 ½
5 years since the judgment. We've been paid nothing, okay. I hold only
6 \$100,000 undisputed as security for this judgment.

7 In my response I provided some financial information as to the
8 operations of A Cab. They can clearly pay this judgment. They could
9 have paid it since 2018 when it was rendered. If they're not going to post
10 a bond for the full amount of this judgment plus my attorney's fees that I'm
11 owed, I don't understand how the Court, in equity, could even possibly
12 grant them the relief that they propose they're entitled to. I don't see that
13 their entitled to any relief here because again there's no -- on the merits
14 what they're saying just doesn't make any sense.

15 And again, the Supreme Court in 2018 when it terminated the
16 mandamus proceedings in *Dubric* recognized that this judgment in this
17 court was final. And *Dubric* was not going to affect that judgement and it
18 can't affect that judgment. So there's no basis to grant the stay and there
19 certainly would be an abuse -- I submit, Your Honor, it would be an abuse
20 of discretion to grant the stay at this point, certainly without a bond being
21 posted for the amount of my client's judgments and for my fees.

22 THE COURT: All right. Understood, Mr. Greenberg.

23 Mr. Rodriguez, final word.

24 MS. RODRIGUEZ: Well, Your Honor, I just want to respond to
25 some of the representations that are being made to this Court, because

1 Mr. Greenberg is complaining that it's 10 years later and he hasn't
2 received any money. And I think he would agree that he has been the
3 cause of much of this delay. He's first has agreed to many of the stays.
4 There was a lot of stipulations to stay because there were other issues
5 going up to the Supreme Court and he placed the defendants into an
6 involuntary bankruptcy. So there's been a lot of delay and it's not -- you
7 know, so he can't be complaining, oh I haven't gotten money in 10 years,
8 because he has agreed to a lot of that or caused a lot of that.

9 Secondly, as it pertains to the posting of the bond, in the -- I
10 think the Court's recent review of some of the motions that have been
11 flying back and forth, this issue of the bond has been repeatedly brought
12 up. And where it has -- Judge Corey and Judge Bare, Your Honor's
13 predecessors in this case, both determined that a bond was not
14 necessary, that there was sufficient security. And where we last left
15 things was that Judge Bare was -- there's an order that's still outstanding.
16 And I attached this again in my reply last -- yesterday, that the order
17 issued by Rob Bare that indicated any further security would be
18 determined by a Special Master to -- his fees to be shared equally
19 between the parties.

20 Mr. Greenberg refused to pay the Special Master. So that has
21 just sat there. The Court asked for a recommendation for the Special
22 from the Special Master. That has not moved forward because Mr.
23 Greenberg refuses to comply with that order. So now he's coming in and
24 saying, oh we don't have a bond. That's his fault. He won't pay for the
25 Special Master to do his job.

1 The other thing I just want to mention to the Court is he's talking
2 about this judgment that is in place in 2018 from Judge Cory. But this
3 case in front of Judge Delaney settled two years earlier in 2016. So these
4 are arguments that are going to up the Supreme Court. This new
5 argument that he's stating to this District Court about, well I have
6 judgment against A Cab Series, LLC and this is not going to be affected at
7 all, it absolutely is going to be affected. One of the main issues that's
8 been remanded to this District Court is a determination of who is even
9 liable for any judgment. That is on remand to this District Court. So all of
10 these things need to be resolved before this Court ever considers entry of
11 a new judgment in this case.

12 But primarily if the one that I'm moving on right now is initiated
13 by Mr. Greenberg. If he does not believe that the *Dubric* settlement, in his
14 own words, should not modify, should not release, should not settle any of
15 the Murray people, which is his representation to this District Court, he's
16 making the complete opposite representation to the Nevada Supreme
17 Court. He should just drop that appeal then and then we can move
18 forward. But he's arguing in contradiction to himself, Your Honor. We
19 believe that a stay is appropriate.

20 THE COURT: All right. I do find that based on the arguments
21 today the *Dubric* decision will affect the new judgment in this case. I also
22 find the under the *Dollar Rental Car* case defendant has met the four stay
23 factors. There's a strong showing that the party requesting the stay is
24 likely to prevail. Party requesting the stay will sustain irreparable injury
25 without it in the form of double recovery, duplicative judgments, the

1 settlement pot being wrongfully distributed. That would also affect the --
2 that's -- the stay would also substantially harm other interested parties --
3 not issuing the stay, and then ultimately in the public interest.

4 I think all those have been met by defendant, and so I will grant
5 the stay at this time. The bond issue I do find has been previously
6 determined that sufficient security exists to not require bond from Judges
7 Bare and Cory and I will not impose that at this time. Defendant is to
8 prepare the order.

9 MR. GREENBERG: Your Honor, --

10 THE COURT: Yeah.

11 MS. RODRIGUEZ: Thank you, Your Honor.

12 MR. GREENBERG: Where does this leave us with the motions
13 that are on calendar for the 23rd and the 30th?

14 THE COURT: I don't think we can hear them then at this time if
15 there's a stay in place.

16 MR. GREENBERG: Okay. Your Honor, I don't want to burden
17 the Court with rehearing on this unless the Court would invite it. So I
18 would ask if I could get a transcript --

19 THE COURT: Of course.

20 MR. GREENBERG: -- and we will proceed --

21 THE COURT: Thank you.

22 MR. GREENBERG: -- at that point, Your Honor. Thank you.

23 THE COURT: Are there -- if there's any issues in front of me on
24 the 23rd that do not -- that are not indicated by the stay. But I can't see
25 any.

1 MR. GREENBERG: Well, Your Honor, I don't quite understand
2 why actually any of the issue on the 23rd need to be not resolved, because
3 it's a question of getting the judgment amount set, getting my award of
4 attorney's fees set. And if enforcement of the judgment is stayed, then
5 enforcement of the judgement against A Cab Series, LLC will be stayed,
6 Your Honor. So those matters can be resolved, Your Honor.

7 Again, these are minimum wages that are owed to taxi drivers
8 that have been waiting years for payment. This has been under appeal
9 for 3 ½ years. The fact that there was no bond posted or a nominal bond
10 posted may have made sense when there was an appeal pending of the
11 final judgment. But the judgment's been resolved. It's been sustained
12 against the corporate entity here, Your Honor. It's not going away, not
13 against that entity.

14 MR. GREENBERG: And I've explained it to Your Honor.

15 THE COURT: I understand.

16 MR. GREENBERG: I am repeating myself.

17 THE COURT: I understand. Mr. Greenberg. We'll get you a
18 transcript. And at this point we're not going to go forward with the motions
19 on the 23rd.

20 MR. GREENBERG: I understand, Your Honor, you've been
21 patient with me. Thank you for --

22 THE COURT: No, I appreciate your arguments.

23 MR. GREENBERG: -- your courtesy.

24 THE COURT: You --

25 MR. GREENBERG: -- in hearing me out.

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THE COURT: You've both been wonderful.

MS. RODRIGUEZ: Thank you, Your Honor.

THE COURT: Thank you so much everyone.

MS. RODRIGUEZ: I'll prepare an order.

[Hearing concluded at 10:18 a.m.]

ATTEST: I do hereby certify that I have truly and correctly transcribed the audio/video proceedings in the above-entitled case to the best of my ability.



Jessica Kirkpatrick
Court Recorder/Transcriber

1 LEON GREENBERG, ESQ.
2 Nevada Bar No.: 8094
3 Leon Greenberg Professional Corporation
4 2965 South Jones Boulevard - Suite E-3
5 Las Vegas, Nevada 89146
6 (702) 383-6085
7 (702) 385-1827(fax)
8 leongreenberg@overtimelaw.com
9 Attorneys for Plaintiffs

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DISTRICT COURT
CLARK COUNTY, NEVADA

MICHAEL MURRAY and
MICHAEL RENO, individually and
on behalf of all others similarly
situated,

Plaintiffs,

vs.

A CAB TAXI SERVICE LLC, A
CAB, LLC also known as A CAB
SERIES LLC, and CREIGHTON J.
NADY,

Defendants.

Case No.: A-12-669926-C

DEPT.: II

DECLARATION OF CHARLES BASS

Charles Bass hereby affirms, under penalty of perjury,
that:

1. I am offering this declaration to supplement my declaration of February 11, 2022, and to correct an error in Ex. "2" of that declaration.

2. Ex. "2" of my February 11, 2022, declaration contains a listing at line 427 for "Murray, Michael P." and on line 428 for "Murray, MichaelP." Each of those lines otherwise contains identical information in each column on that person's "EE number" (their employee number in A Cab's records) and the amount (\$883.88) they are owed. This is a duplicate listing for the same person. There is only one Michael P. Murray

1 with this employee number (2018) owed a single amount of \$883.88.

2 3. I have corrected the modified judgment list that was attached as Ex. “2” to
3 my declaration of February 11, 2022, by removing this duplicate entry for Michael P.
4 Murray and creating, at Ex. “1” to this declaration, the modified judgment list in the
5 fashion discussed at paragraph 2 of my declaration of February 11, 2022. That Ex. “1”
6 list indicates in Column “F” \$685,886.60 in unpaid minimum wages and interest is
7 owed to 661 taxi drivers who are each owed at least \$10.00. That list also indicates in
8 Column “D” the amount of minimum wages owed to those 661 taxi drivers (total
9 \$597,772.48); the amount of interest they are owed on their Column “D” amount of
10 unpaid minimum wages in Column “E” (a total of \$88,114.12 in interest); and in
11 Column “H” the amount of the “Set Off from USDOL Settlement” (if any for a taxi
12 driver), a total of \$71,568.24, that reduced the minimum wage shortage (amount
13 otherwise owed) to each taxi driver and set forth in Column “G” (a total of
14 \$669,340.72). The attached Ex. “1” modified judgment list is otherwise identical to the
15 one prepared and produced with my declaration of February 22, 2022.

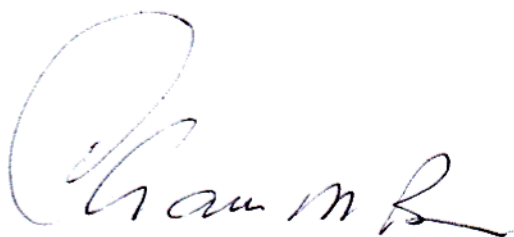
16 4. The duplicate listing error of Michael P. Murray in the modified judgment
17 list provided with my February 22, 2022, declaration arose from a typographical error
18 in A Cab’s records. Those records identified that person using two different spellings:
19 “Murray, MichaelP” and “Murray, Michael P.” Certain records of wages paid and shifts
20 worked were produced by A Cab for this person using each of those spellings and all
21 such records used the same employee identification number (2018). When I processed

1 A Cab's records to create the modified judgment list, as I discussed in my declaration
2 of February 22, 2022, I did so by referencing each employee name, not their employee
3 identification number. This resulted in each differently spelled named being treated as
4 a separate employee and Michael P. Murray being entered on the modified judgment
5 list accompanying my February 22, 2022, declaration (and the original judgment list
6 entered on August 21, 2018) twice, reflecting the two different spellings used for his
7 name. In creating the modified judgment list attached as Ex. "1" to this declaration, I
8 avoided any such error by referencing each A Cab taxi driver's unique employee
9 identification number. There are no such errors in that list as each line on that list is for
10 a unique A Cab taxi driver's employee identification number. Michael P. Murray was
11 also the only A Cab taxi driver who appeared on more than one line (more than once)
12 on the judgment lists I previously produced for this case.

13 I have read the foregoing and affirm under penalty of perjury that the same is true and
14 correct.
15

16 Affirmed this 28th day of March, 2022

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A handwritten signature in blue ink, appearing to read "Charles M. Bass", is written over the line numbers 21 through 25.

Charles M. Bass

EXHIBIT "1"

EXHIBIT "1"

	A	B	C	D	E	F	G	H
1		Totals for All Class Members		\$597,772.48	\$88,114.12	\$685,886.60	\$669,340.72	(\$71,568.24)
2	Employee			Total Lower Tier Minimum Wages Owed 10/8/2010 - 12/31/2015 After Set Off and Over	Interest from 1/1 2016 through	Total with	Total 10/8/2010 - 12/31/2015	Set Off from USDOL
3	Number	Last Name	First Name	10.00	6/30/2018	Interest	Shortage	Settlement
4	3861	Abarca	Enrique	\$815.12	\$120.15	\$935.27	\$815.12	\$0.00
5	3638	Abdella	Juhar	\$178.63	\$26.33	\$204.96	\$319.03	(\$140.40)
6	105408	Abdulle	Abdirashid	\$165.36	\$24.38	\$189.74	\$165.36	\$0.00
7	3606	Abebe	Tamrat	\$3,010.66	\$443.78	\$3,454.44	\$3,010.66	\$0.00
8	3302	Abraha	Tesfalem	\$411.83	\$60.70	\$472.53	\$411.83	\$0.00
9	105813	Abt	Daniel	\$891.35	\$131.39	\$1,022.74	\$891.35	\$0.00
10	2640	Abuel	Alan	\$26.99	\$3.98	\$30.97	\$259.30	(\$232.31)
11	3513	Abuhay	Fasil	\$199.88	\$29.46	\$229.34	\$390.89	(\$191.01)
12	100221	Ackman	Charles	\$385.21	\$56.78	\$441.99	\$385.21	\$0.00
13	3853	Acosta	Lorrie	\$135.08	\$19.91	\$154.99	\$135.08	\$0.00
14	3609	Adamian	Robert	\$794.61	\$117.13	\$911.74	\$995.17	(\$200.56)
15	3896	Adams	Michael	\$193.46	\$28.52	\$221.98	\$283.69	(\$90.23)
16	3641	Adamson	Nicole	\$1,012.32	\$149.22	\$1,161.54	\$1,306.43	(\$294.11)
17	25411	Adhanom	Tewoldebrhan	\$124.16	\$18.30	\$142.46	\$124.16	\$0.00
18	3846	Agacevic	Ibnel	\$299.99	\$44.22	\$344.21	\$299.99	\$0.00
19	100821	Agostino	Nicholas	\$1,436.35	\$211.72	\$1,648.07	\$1,436.35	\$0.00
20	3684	Ahmed	Ahmed	\$926.12	\$136.51	\$1,062.63	\$1,290.23	(\$364.11)
21	3678	Alemayehu	Tewodros	\$42.09	\$6.20	\$48.30	\$42.09	\$0.00
22	3692	Alessi	Anthony	\$13.62	\$2.01	\$15.63	\$13.62	\$0.00
23	3712	Alexander	Darvious	\$63.13	\$9.30	\$72.43	\$63.13	\$0.00
24	3869	Alfaro	Joe	\$300.71	\$44.33	\$345.03	\$300.71	\$0.00
25	3661	Ali	Abraham	\$2,224.87	\$327.95	\$2,552.82	\$2,224.87	\$0.00
26	104525	Allegue	Yusnier	\$1,414.77	\$208.54	\$1,623.31	\$1,414.77	\$0.00
27	2903	Allen	Otis	\$6,359.32	\$937.39	\$7,296.71	\$6,359.32	\$0.00
28	25979	Alnaif	Abdul	\$711.15	\$104.83	\$815.98	\$743.50	(\$32.35)
29	3787	Altamura	Vincent	\$503.89	\$74.28	\$578.17	\$503.89	\$0.00
30	103822	Alvarado	Santiago	\$94.08	\$13.87	\$107.95	\$94.08	\$0.00
31	3769	Alves	Mary	\$988.61	\$145.72	\$1,134.33	\$988.61	\$0.00
32	3645	Ameha	Samuale	\$244.82	\$36.09	\$280.91	\$244.82	\$0.00
33	24038	Anantagul	Kamol	\$154.39	\$22.76	\$177.15	\$154.39	\$0.00
34	3564	Anastasio	James	\$111.24	\$16.40	\$127.63	\$111.24	\$0.00
35	29709	Andersen	Jason	\$1,197.51	\$176.52	\$1,374.03	\$1,968.47	(\$770.96)
36	106828	Anderson	Calvin	\$1,353.44	\$199.50	\$1,552.95	\$1,353.44	\$0.00
37	3672	Anderson	Roosevelt	\$2,114.65	\$311.71	\$2,426.36	\$2,787.37	(\$672.72)
38	3943	Anderson	William	\$289.40	\$42.66	\$332.06	\$289.40	\$0.00
39	3650	Anif	Janeid	\$1,406.55	\$207.33	\$1,613.88	\$1,406.55	\$0.00
40	2942	Appel	Howard	\$23.47	\$3.46	\$26.93	\$23.47	\$0.00
41	3614	Applegate	Angela	\$260.97	\$38.47	\$299.44	\$319.42	(\$58.45)
42	3730	Arar	Isam	\$1,726.82	\$254.54	\$1,981.36	\$2,235.96	(\$509.14)
43	104910	Archer	Bert	\$362.37	\$53.41	\$415.78	\$362.37	\$0.00
44	3709	Arell	Roger	\$42.41	\$6.25	\$48.66	\$92.02	(\$49.61)
45	3931	Arena	Francis	\$527.13	\$77.70	\$604.83	\$527.13	\$0.00

	A	B	C	D	E	F	G	H
46	26553	Arnwine	Howard	\$2,020.90	\$297.89	\$2,318.78	\$2,185.05	(\$164.15)
47	3676	Asad	Tassawar	\$28.49	\$4.20	\$32.69	\$28.49	\$0.00
48	31622	Asefa	Wossen	\$456.31	\$67.26	\$523.57	\$456.31	\$0.00
49	3828	Aseffa	Mulubahan	\$1,992.18	\$293.66	\$2,285.84	\$2,431.45	(\$439.27)
50	3741	Assena	Zenebech	\$41.86	\$6.17	\$48.02	\$41.86	\$0.00
51	3873	Atanasov	Nikolay	\$154.17	\$22.73	\$176.90	\$154.17	\$0.00
52	3825	Atterbury	Joseph	\$159.92	\$23.57	\$183.49	\$159.92	\$0.00
53	110476	Auberry Jr.	Glenn	\$309.98	\$45.69	\$355.67	\$309.98	\$0.00
54	3667	Aurich	Juan	\$1,489.26	\$219.52	\$1,708.78	\$2,508.20	(\$1,018.94)
55	2926	Awalom	Alemayehu	\$6,288.28	\$926.92	\$7,215.20	\$6,288.28	\$0.00
56	3707	Azmoudeh	Bobby	\$208.23	\$30.69	\$238.92	\$208.23	\$0.00
57	3605	Azzouay	El	\$135.48	\$19.97	\$155.45	\$135.48	\$0.00
58	20210	Ba	Awa	\$1,270.02	\$187.21	\$1,457.22	\$1,270.02	\$0.00
59	108404	Baca	James	\$105.93	\$15.61	\$121.54	\$105.93	\$0.00
60	27358	Baca-Paez	Sergio	\$2,124.87	\$313.21	\$2,438.08	\$2,501.92	(\$377.05)
61	3838	Baker	Timothy	\$2,135.81	\$314.83	\$2,450.64	\$2,431.20	(\$295.39)
62	27315	Bakhtiari	Marco	\$2,701.33	\$398.19	\$3,099.52	\$3,284.38	(\$583.05)
63	112015	Bambenek	Matthew	\$337.56	\$49.76	\$387.31	\$337.56	\$0.00
64	112193	Bandi	Pedram	\$11.21	\$1.65	\$12.86	\$11.21	\$0.00
65	2523	Banuelos	Ruben	\$150.22	\$22.14	\$172.36	\$150.22	\$0.00
66	3909	Barbu	Ion	\$2,507.70	\$369.64	\$2,877.34	\$2,562.29	(\$54.59)
67	3760	Bardo	Timothy	\$746.65	\$110.06	\$856.71	\$746.65	\$0.00
68	3369	Barich	Edward	\$189.31	\$27.90	\$217.21	\$189.31	\$0.00
69	100158	Barnes	Benjamin	\$5,936.88	\$875.12	\$6,812.00	\$5,936.88	\$0.00
70	2993	Barr	Kenneth	\$574.03	\$84.61	\$658.64	\$615.48	(\$41.45)
71	107792	Barrameda	Danilo	\$56.83	\$8.38	\$65.20	\$56.83	\$0.00
72	3601	Barseghyan	Artur	\$373.48	\$55.05	\$428.54	\$488.18	(\$114.70)
73	3887	Barstow	Lance	\$131.44	\$19.37	\$150.81	\$131.44	\$0.00
74	3829	Bartunek	Johnny	\$19.47	\$2.87	\$22.34	\$19.47	\$0.00
75	3649	Bataineh	Ali	\$218.35	\$32.18	\$250.53	\$218.35	\$0.00
76	2454	Batista	Eugenio	\$49.03	\$7.23	\$56.25	\$49.03	\$0.00
77	3926	Bauer	William	\$217.42	\$32.05	\$249.47	\$217.42	\$0.00
78	25454	Bell	Jeffrey	\$26.45	\$3.90	\$30.34	\$26.45	\$0.00
79	3594	Bellegarde	Josue	\$11.51	\$1.70	\$13.21	\$11.51	\$0.00
80	3622	Benel	Christian	\$1,457.21	\$214.80	\$1,672.01	\$1,589.84	(\$132.63)
81	110687	Berger	James	\$58.09	\$8.56	\$66.65	\$58.09	\$0.00
82	103219	Berichon	Mike	\$947.14	\$139.61	\$1,086.75	\$947.14	\$0.00
83	23373	Bey	Ronald	\$2,724.05	\$401.54	\$3,125.58	\$2,724.05	\$0.00
84	2960	Bialorucki	Richard	\$833.46	\$122.86	\$956.32	\$1,071.81	(\$238.35)
85	2986	Black	Burton	\$174.69	\$25.75	\$200.43	\$174.69	\$0.00
86	29914	Bliss	Valerie	\$124.09	\$18.29	\$142.38	\$124.09	\$0.00
87	112455	Blum III	Arthur	\$47.07	\$6.94	\$54.01	\$47.07	\$0.00
88	2487	Boling	Freddy	\$528.24	\$77.87	\$606.11	\$528.24	\$0.00
89	2802	Borja	Virginia	\$456.50	\$67.29	\$523.79	\$745.82	(\$289.32)
90	3723	Bowen	Christopher	\$674.72	\$99.46	\$774.17	\$674.72	\$0.00
91	3508	Bozic	Nebojsa	\$263.10	\$38.78	\$301.88	\$263.10	\$0.00
92	28324	Bradley	Leroy	\$2,391.80	\$352.56	\$2,744.36	\$2,810.40	(\$418.60)
93	2056	Brauchle	Michael	\$3,344.49	\$492.99	\$3,837.48	\$4,054.05	(\$709.56)
94	3697	Briggs	Andrew	\$52.36	\$7.72	\$60.08	\$52.36	\$0.00
95	3716	Brimhall	Tracy	\$3,804.84	\$560.85	\$4,365.69	\$3,804.84	\$0.00

	A	B	C	D	E	F	G	H
96	3621	Brisco	Allen	\$3,226.36	\$475.58	\$3,701.93	\$3,226.36	\$0.00
97	100299	Briski	Louis	\$226.23	\$33.35	\$259.58	\$414.70	(\$188.47)
98	110579	Brooks	Jose	\$46.30	\$6.83	\$53.13	\$46.30	\$0.00
99	3949	Brown	Daniel	\$730.19	\$107.63	\$837.82	\$730.19	\$0.00
100	3067	Brown	Maurice	\$774.77	\$114.20	\$888.97	\$774.77	\$0.00
101	2704	Buergey	Christopher	\$1,051.28	\$154.96	\$1,206.24	\$1,051.28	\$0.00
102	28249	Bunns	Tommy	\$564.89	\$83.27	\$648.16	\$564.89	\$0.00
103	111670	Burns	Brittany	\$122.95	\$18.12	\$141.08	\$122.95	\$0.00
104	109309	Caldwell Jr.	Paul	\$364.22	\$53.69	\$417.90	\$364.22	\$0.00
105	3892	Calise	Domenic	\$57.13	\$8.42	\$65.55	\$57.13	\$0.00
106	3791	Cancio-Betancou	Rene	\$282.86	\$41.69	\$324.55	\$282.86	\$0.00
107	106463	Capone	Gary	\$1,177.79	\$173.61	\$1,351.40	\$1,177.79	\$0.00
108	3733	Carr	Jamaal	\$127.11	\$18.74	\$145.84	\$127.11	\$0.00
109	2660	Carracedo	Sonny	\$360.54	\$53.15	\$413.69	\$360.54	\$0.00
110	3899	Casiello	Anthony	\$552.19	\$81.39	\$633.58	\$703.35	(\$151.16)
111	102334	Castellanos	Joaquin	\$419.56	\$61.84	\$481.40	\$419.56	\$0.00
112	2531	Catoggio	Alfred	\$143.11	\$21.10	\$164.21	\$143.11	\$0.00
113	3843	Caymite	Luc	\$221.02	\$32.58	\$253.60	\$221.02	\$0.00
114	104310	Chana	Chen	\$658.00	\$96.99	\$754.99	\$658.00	\$0.00
115	3420	Chang	Yun-Yu	\$697.04	\$102.75	\$799.78	\$697.04	\$0.00
116	3831	Charouat	Malek	\$412.11	\$60.75	\$472.86	\$412.11	\$0.00
117	24737	Charov	Ivaylo	\$67.83	\$10.00	\$77.83	\$67.83	\$0.00
118	3663	Chasteen	Jeffery	\$38.80	\$5.72	\$44.52	\$38.80	\$0.00
119	3714	Chatrizeh	Shahin	\$744.82	\$109.79	\$854.61	\$950.52	(\$205.70)
120	112394	Chavez	Rosemarie	\$13.29	\$1.96	\$15.25	\$13.29	\$0.00
121	3249	Chico	David	\$2,251.13	\$331.83	\$2,582.95	\$2,251.13	\$0.00
122	3729	Choudhary	Krishna	\$1,694.88	\$249.83	\$1,944.71	\$1,694.88	\$0.00
123	3588	Christensen	Rosa	\$1,878.35	\$276.88	\$2,155.22	\$1,878.35	\$0.00
124	3881	Christodoulou	Panos	\$584.13	\$86.10	\$670.23	\$584.13	\$0.00
125	26783	Clark	Dennis	\$513.57	\$75.70	\$589.27	\$513.57	\$0.00
126	31467	Clarke	Michael	\$69.42	\$10.23	\$79.65	\$69.42	\$0.00
127	107430	Cobon	Karl	\$1,023.14	\$150.81	\$1,173.95	\$1,023.14	\$0.00
128	3802	Cobos	Aaron	\$258.72	\$38.14	\$296.85	\$258.72	\$0.00
129	3885	Cohoon	Thomas	\$2,087.12	\$307.65	\$2,394.77	\$2,261.53	(\$174.41)
130	3552	Coizeau	Leonardo	\$3,285.52	\$484.30	\$3,769.81	\$3,433.58	(\$148.06)
131	102415	Collier	Ella	\$293.00	\$43.19	\$336.19	\$447.70	(\$154.70)
132	3862	Collins	Lincoln	\$408.91	\$60.27	\$469.18	\$520.42	(\$111.51)
133	108041	Comeau	Brian	\$70.76	\$10.43	\$81.19	\$70.76	\$0.00
134	3596	Conde	Carlos	\$103.01	\$15.18	\$118.19	\$103.01	\$0.00
135	3900	Coney-Cumming	Keisha	\$531.04	\$78.28	\$609.32	\$531.04	\$0.00
136	3738	Conway	James	\$3,480.75	\$513.08	\$3,993.82	\$3,980.61	(\$499.86)
137	112398	Corona	Fernando	\$775.97	\$114.38	\$890.35	\$775.97	\$0.00
138	2051	Costello	Brad	\$1,305.53	\$192.44	\$1,497.97	\$1,696.23	(\$390.70)
139	3550	Craddock	Charles	\$557.35	\$82.16	\$639.51	\$557.35	\$0.00
140	3935	Craffey	Richard	\$672.27	\$99.09	\$771.36	\$672.27	\$0.00
141	23774	Crawford	Darryl	\$141.24	\$20.82	\$162.05	\$224.46	(\$83.22)
142	21457	Crawford	Maximillian	\$156.56	\$23.08	\$179.64	\$156.56	\$0.00
143	30300	Cruz-Decastro	Antonio	\$47.37	\$6.98	\$54.35	\$47.37	\$0.00
144	109796	Curtin	Ronald	\$1,891.68	\$278.84	\$2,170.52	\$1,891.68	\$0.00
145	109130	Dacayanan	Liza	\$515.01	\$75.91	\$590.92	\$515.01	\$0.00

	A	B	C	D	E	F	G	H
146	23948	Daffron	Daniel	\$1,242.13	\$183.10	\$1,425.23	\$1,242.13	\$0.00
147	32238	Daggett Jr.	Rudolph	\$618.68	\$91.20	\$709.87	\$618.68	\$0.00
148	3777	Daniels	Donald	\$3,274.58	\$482.69	\$3,757.26	\$3,274.58	\$0.00
149	110936	Daniels	James	\$57.14	\$8.42	\$65.56	\$57.14	\$0.00
150	3511	Danielsen	Danny	\$377.99	\$55.72	\$433.71	\$377.99	\$0.00
151	3428	D'Arcy	Timothy	\$4,630.45	\$682.55	\$5,313.00	\$4,630.45	\$0.00
152	101103	Davila-Romero	Monica	\$58.85	\$8.67	\$67.52	\$58.85	\$0.00
153	28065	Davis	Bradley	\$2,167.85	\$319.55	\$2,487.40	\$2,167.85	\$0.00
154	2573	Deguzman	Fermin	\$294.22	\$43.37	\$337.59	\$294.22	\$0.00
155	3675	Deguzman	Leloi	\$619.41	\$91.30	\$710.71	\$619.41	\$0.00
156	111137	Dejacto	Giovanna	\$660.42	\$97.35	\$757.77	\$660.42	\$0.00
157	25935	Delgado	Carlos	\$105.26	\$15.52	\$120.78	\$105.26	\$0.00
158	2057	DeMarco	William	\$581.36	\$85.69	\$667.05	\$581.36	\$0.00
159	3566	Deocampo	Michael	\$198.88	\$29.31	\$228.19	\$222.51	(\$23.63)
160	3936	Dial	Donald	\$811.92	\$119.68	\$931.60	\$811.92	\$0.00
161	111062	Diamond	Jeffrey	\$273.19	\$40.27	\$313.46	\$273.19	\$0.00
162	3719	Diaz	Aiser	\$22.90	\$3.38	\$26.28	\$22.90	\$0.00
163	3657	Dibaba	Desta	\$958.68	\$141.31	\$1,099.99	\$958.68	\$0.00
164	3905	Dillard	Corey	\$904.27	\$133.29	\$1,037.56	\$978.27	(\$74.00)
165	2031	Dinok	Ildiko	\$1,530.38	\$225.58	\$1,755.96	\$1,530.38	\$0.00
166	6832	Dionas	John	\$87.73	\$12.93	\$100.66	\$87.73	\$0.00
167	3756	Disbrow	Ronald	\$2,475.64	\$364.92	\$2,840.56	\$2,858.43	(\$382.79)
168	3395	Dixon	Julius	\$669.09	\$98.63	\$767.72	\$669.09	\$0.00
169	2812	Djapa-Ivosevic	Davor	\$295.33	\$43.53	\$338.87	\$295.33	\$0.00
170	3704	Dobszewicz	Gary	\$2,278.69	\$335.89	\$2,614.57	\$3,064.20	(\$785.51)
171	3024	Donahoe	Stephen	\$473.62	\$69.81	\$543.44	\$473.62	\$0.00
172	3478	Dontchev	Nedeltcho	\$2,456.69	\$362.13	\$2,818.81	\$2,562.54	(\$105.85)
173	3830	Dotson	Contessa	\$49.54	\$7.30	\$56.84	\$49.54	\$0.00
174	3378	Dotson	Eugene	\$232.38	\$34.25	\$266.63	\$298.04	(\$65.66)
175	106763	Doyle	William	\$304.91	\$44.94	\$349.85	\$304.91	\$0.00
176	2871	Draper	Ivan	\$885.79	\$130.57	\$1,016.35	\$1,988.56	(\$1,102.77)
177	3754	Dudek	Anthony	\$1,421.81	\$209.58	\$1,631.39	\$1,421.81	\$0.00
178	3916	Duna	Lawrence	\$760.98	\$112.17	\$873.15	\$760.98	\$0.00
179	3617	Durey	Robert	\$795.00	\$117.19	\$912.19	\$1,086.96	(\$291.96)
180	2006	Durtschi	Jeffrey	\$496.97	\$73.26	\$570.23	\$585.98	(\$89.01)
181	100046	Dymond	Ernest	\$62.96	\$9.28	\$72.24	\$62.96	\$0.00
182	3907	Eddik	Muhannad	\$31.60	\$4.66	\$36.26	\$31.60	\$0.00
183	2637	Edwards	Jeffrey	\$823.78	\$121.43	\$945.21	\$1,307.78	(\$484.00)
184	3381	Egan	Joseph	\$3,088.61	\$455.27	\$3,543.88	\$3,088.61	\$0.00
185	3595	Ekoue	Ayi	\$2,813.75	\$414.76	\$3,228.50	\$2,813.75	\$0.00
186	111822	Elgendy	Mohamed	\$96.88	\$14.28	\$111.17	\$96.88	\$0.00
187	18678	Eliades	George	\$272.83	\$40.22	\$313.04	\$272.83	\$0.00
188	3771	Ellis	Charles	\$763.81	\$112.59	\$876.40	\$763.81	\$0.00
189	109641	Emling	Paul	\$146.38	\$21.58	\$167.95	\$470.16	(\$323.78)
190	106698	Emter	Christopher	\$124.52	\$18.36	\$142.88	\$124.52	\$0.00
191	3567	Ernst	William	\$2,071.00	\$305.27	\$2,376.27	\$3,661.62	(\$1,590.62)
192	3937	Esfarjany	Mahmood	\$61.93	\$9.13	\$71.06	\$61.93	\$0.00
193	3689	Eshaghi	Mohammad	\$243.90	\$35.95	\$279.85	\$347.00	(\$103.10)
194	3889	Estrada	Michael	\$217.71	\$32.09	\$249.80	\$217.71	\$0.00
195	3628	Evans	Steven	\$23.51	\$3.46	\$26.97	\$23.51	\$0.00

	A	B	C	D	E	F	G	H
196	3703	Fadlallah	Michel	\$675.34	\$99.55	\$774.88	\$857.18	(\$181.84)
197	29981	Fair	Kirby	\$496.57	\$73.20	\$569.77	\$496.57	\$0.00
198	3795	Farah	Yohannes	\$391.88	\$57.76	\$449.64	\$391.88	\$0.00
199	2682	Fears	Thomas	\$2,605.88	\$384.12	\$2,990.00	\$3,198.92	(\$593.04)
200	3591	Feleke	Melak	\$989.78	\$145.90	\$1,135.67	\$1,190.60	(\$200.82)
201	3549	Fesehazion	Teabe	\$1,306.55	\$192.59	\$1,499.14	\$1,865.61	(\$559.06)
202	111068	Filatov	Andrey	\$20.19	\$2.98	\$23.16	\$20.19	\$0.00
203	3877	Filfel	Kamal	\$3,138.25	\$462.59	\$3,600.84	\$3,138.25	\$0.00
204	109381	Fitzsimmons	Marc	\$327.92	\$48.34	\$376.25	\$327.92	\$0.00
205	111729	Flanders	Mary	\$208.19	\$30.69	\$238.88	\$208.19	\$0.00
206	3705	Fleming	Gary	\$3,227.44	\$475.74	\$3,703.17	\$4,079.24	(\$851.80)
207	3939	Ford	Todd	\$982.51	\$144.83	\$1,127.33	\$982.51	\$0.00
208	3927	Fox	Gordon	\$258.33	\$38.08	\$296.41	\$258.33	\$0.00
209	3860	Frankenberger	Grant	\$625.40	\$92.19	\$717.58	\$625.40	\$0.00
210	2614	Franklin	David	\$530.60	\$78.21	\$608.81	\$530.60	\$0.00
211	3774	Furst III	James	\$48.51	\$7.15	\$55.66	\$48.51	\$0.00
212	107590	Galtieri	Frank	\$269.32	\$39.70	\$309.02	\$269.32	\$0.00
213	2782	Garcia	John	\$5,827.20	\$858.95	\$6,686.15	\$5,985.76	(\$158.56)
214	3652	Garcia	Miguel	\$1,119.02	\$164.95	\$1,283.96	\$1,119.02	\$0.00
215	3522	Gardea	Alfred	\$1,460.80	\$215.33	\$1,676.12	\$1,460.80	\$0.00
216	3694	Gared	Yaekob	\$76.99	\$11.35	\$88.34	\$76.99	\$0.00
217	3793	Garras	Bill	\$160.33	\$23.63	\$183.97	\$160.33	\$0.00
218	26636	Garrett	Kathleen	\$20.07	\$2.96	\$23.03	\$20.07	\$0.00
219	3642	Gaumond	Gerard	\$197.50	\$29.11	\$226.61	\$197.50	\$0.00
220	3503	Gebrayes	Henock	\$360.01	\$53.07	\$413.08	\$360.01	\$0.00
221	3801	Gebremariam	Meley	\$200.99	\$29.63	\$230.61	\$200.99	\$0.00
222	3580	Gebreyes	Fanuel	\$513.28	\$75.66	\$588.93	\$933.43	(\$420.15)
223	3328	Gelane	Samuel	\$4,423.27	\$652.01	\$5,075.28	\$5,569.67	(\$1,146.40)
224	3589	Gessese	Worku	\$81.57	\$12.02	\$93.59	\$81.57	\$0.00
225	3865	Ghori	Azhar	\$205.23	\$30.25	\$235.48	\$205.23	\$0.00
226	3759	Gianopoulos	Samuel	\$1,133.49	\$167.08	\$1,300.57	\$1,406.99	(\$273.50)
227	3696	Gillett	David	\$519.94	\$76.64	\$596.58	\$1,435.64	(\$915.70)
228	3600	Gilmore	Paula	\$16.54	\$2.44	\$18.98	\$82.81	(\$66.27)
229	3924	Gilo	Hobart	\$645.59	\$95.16	\$740.75	\$645.59	\$0.00
230	31076	Glaser	Stephen	\$153.87	\$22.68	\$176.55	\$153.87	\$0.00
231	3121	Gleason	John	\$2,790.18	\$411.28	\$3,201.46	\$4,140.17	(\$1,349.99)
232	3540	Glogovac	Goran	\$603.36	\$88.94	\$692.30	\$1,152.08	(\$548.72)
233	3762	Godsey	Kelly	\$1,233.95	\$181.89	\$1,415.83	\$1,233.95	\$0.00
234	3739	Godsey	Thomas	\$90.55	\$13.35	\$103.89	\$90.55	\$0.00
235	106897	Goettsche	Dale	\$31.60	\$4.66	\$36.26	\$31.60	\$0.00
236	31840	Gokcek	Guney	\$99.83	\$14.72	\$114.55	\$99.83	\$0.00
237	3688	Golden	Theresa	\$686.85	\$101.24	\$788.10	\$686.85	\$0.00
238	3646	Golla	Dawit	\$72.45	\$10.68	\$83.12	\$72.45	\$0.00
239	3848	Gomez-Gomez	Arlene	\$138.32	\$20.39	\$158.70	\$138.32	\$0.00
240	3903	Gonzalez	Luis	\$1,355.04	\$199.74	\$1,554.78	\$1,355.04	\$0.00
241	111390	Gonzalez	Pedro	\$263.79	\$38.88	\$302.67	\$263.79	\$0.00
242	3586	Gonzalez	Ramon	\$503.17	\$74.17	\$577.33	\$503.17	\$0.00
243	3929	Gonzalez-Ruiz	Jose	\$178.96	\$26.38	\$205.34	\$178.96	\$0.00
244	3794	Goolsby	Victor	\$933.19	\$137.56	\$1,070.74	\$933.19	\$0.00
245	3391	Grafton	Natasha	\$1,771.74	\$261.16	\$2,032.90	\$1,771.74	\$0.00

	A	B	C	D	E	F	G	H
246	24757	Granchelle	Andrew	\$700.68	\$103.28	\$803.96	\$700.68	\$0.00
247	19253	Gray	Gary	\$3,124.58	\$460.58	\$3,585.16	\$3,790.84	(\$666.26)
248	3197	Green	Tony	\$1,256.38	\$185.19	\$1,441.57	\$2,445.41	(\$1,189.03)
249	2971	Gross	Timothy	\$866.18	\$127.68	\$993.85	\$866.18	\$0.00
250	18964	Guerrero	Daniel	\$1,211.23	\$178.54	\$1,389.76	\$1,211.23	\$0.00
251	3655	Guinan	William	\$318.19	\$46.90	\$365.09	\$552.49	(\$234.30)
252	3895	Gyuro	John	\$343.12	\$50.58	\$393.70	\$343.12	\$0.00
253	3636	Habtom	Ermias	\$663.42	\$97.79	\$761.21	\$663.42	\$0.00
254	3799	Hadley	Aaron	\$221.75	\$32.69	\$254.44	\$333.64	(\$111.89)
255	3827	Haigh III	Walter	\$202.61	\$29.87	\$232.48	\$202.61	\$0.00
256	111568	Hammoud	Wissam	\$618.64	\$91.19	\$709.83	\$618.64	\$0.00
257	21446	Handlon	Michael	\$649.91	\$95.80	\$745.71	\$649.91	\$0.00
258	3734	Hanna	Christopher	\$353.39	\$52.09	\$405.48	\$353.39	\$0.00
259	3402	Hansen	Jordan	\$1,238.67	\$182.59	\$1,421.26	\$1,410.40	(\$171.73)
260	29609	Haralambov	Valko	\$260.48	\$38.40	\$298.88	\$260.48	\$0.00
261	3519	Harms	Michael	\$728.33	\$107.36	\$835.69	\$728.33	\$0.00
262	3761	Harrell	Mark	\$1,070.06	\$157.73	\$1,227.79	\$1,484.83	(\$414.77)
263	3855	Harris	Dennis	\$2,455.84	\$362.00	\$2,817.84	\$2,846.89	(\$391.05)
264	2564	Harris	Jay	\$996.17	\$146.84	\$1,143.01	\$1,155.16	(\$158.99)
265	3811	Harris III	Reggie	\$19.13	\$2.82	\$21.95	\$19.13	\$0.00
266	3941	Harrison	Andrew	\$297.76	\$43.89	\$341.65	\$297.76	\$0.00
267	24039	Hart	Brandi	\$162.45	\$23.95	\$186.40	\$162.45	\$0.00
268	3656	Harun	Idris	\$114.58	\$16.89	\$131.47	\$114.58	\$0.00
269	3515	Hasen	Akmel	\$114.78	\$16.92	\$131.69	\$188.59	(\$73.81)
270	3742	Haskell	William	\$3,803.40	\$560.64	\$4,364.03	\$4,896.30	(\$1,092.90)
271	3808	Hays	Larry	\$2,054.93	\$302.91	\$2,357.84	\$2,293.24	(\$238.31)
272	109457	Hearne	Stephen	\$188.99	\$27.86	\$216.85	\$188.99	\$0.00
273	110194	Henderson	Lloyd	\$467.13	\$68.86	\$535.98	\$467.13	\$0.00
274	3933	Hendricks	Mark	\$352.95	\$52.03	\$404.97	\$352.95	\$0.00
275	3634	Herbert	Christopher	\$1,177.50	\$173.57	\$1,351.06	\$1,177.50	\$0.00
276	3763	Herga	Ryan	\$299.22	\$44.11	\$343.32	\$408.57	(\$109.35)
277	101555	Hernandez	Rene	\$272.18	\$40.12	\$312.30	\$272.18	\$0.00
278	107072	Hernandez-Ocan	Amilcar	\$219.91	\$32.42	\$252.33	\$219.91	\$0.00
279	112038	Hill	Douglas	\$294.63	\$43.43	\$338.06	\$294.63	\$0.00
280	109792	Hinds	Monroe	\$304.22	\$44.84	\$349.06	\$304.22	\$0.00
281	2097	Hinks	Dana	\$778.37	\$114.73	\$893.10	\$927.59	(\$149.22)
282	3765	Hirsi	Kamal	\$533.66	\$78.66	\$612.33	\$533.66	\$0.00
283	2464	Hodge	Lee	\$1,173.17	\$172.93	\$1,346.10	\$1,173.17	\$0.00
284	2490	Hoffman	Gery	\$30.38	\$4.48	\$34.86	\$30.38	\$0.00
285	2017	Holcomb	Dalton	\$1,162.76	\$171.40	\$1,334.16	\$1,162.76	\$0.00
286	3864	Holler	Alfonso	\$491.70	\$72.48	\$564.18	\$586.05	(\$94.35)
287	3809	Hollis	James	\$92.91	\$13.70	\$106.61	\$252.73	(\$159.82)
288	3822	Holt	John	\$2,920.16	\$430.44	\$3,350.60	\$2,920.16	\$0.00
289	3653	Hooper	Donald	\$528.58	\$77.92	\$606.50	\$709.80	(\$181.22)
290	3607	Hoschouer	Christina	\$1,321.54	\$194.80	\$1,516.33	\$1,321.54	\$0.00
291	109584	Hosley	Tracie	\$185.20	\$27.30	\$212.50	\$185.20	\$0.00
292	31648	Hu	Karl	\$137.49	\$20.27	\$157.76	\$137.49	\$0.00
293	3849	Huerena	Samuel	\$51.18	\$7.54	\$58.72	\$51.18	\$0.00
294	2400	Hughes	Jerry	\$570.41	\$84.08	\$654.49	\$1,906.43	(\$1,336.02)
295	3780	Hunter	James	\$320.69	\$47.27	\$367.96	\$320.69	\$0.00

	A	B	C	D	E	F	G	H
296	3120	Huntington	Walter	\$311.96	\$45.98	\$357.94	\$311.96	\$0.00
297	27788	Hurd	Donald	\$1,527.27	\$225.13	\$1,752.39	\$1,786.78	(\$259.51)
298	3782	Hurley	Robert	\$246.55	\$36.34	\$282.89	\$246.55	\$0.00
299	2751	Hurtado	Hubert	\$2,544.05	\$375.00	\$2,919.05	\$2,544.05	\$0.00
300	3835	Hussien	Leykun	\$568.36	\$83.78	\$652.14	\$568.36	\$0.00
301	17189	Imran	Muhammad	\$104.12	\$15.35	\$119.46	\$104.12	\$0.00
302	3187	Isaac	Edsel	\$263.62	\$38.86	\$302.48	\$263.62	\$0.00
303	108273	Isanan	Claro	\$199.02	\$29.34	\$228.35	\$199.02	\$0.00
304	107191	Ivanov	Yordan	\$74.55	\$10.99	\$85.54	\$74.55	\$0.00
305	2114	Ivey	Timothy	\$1,046.55	\$154.27	\$1,200.82	\$1,505.32	(\$458.77)
306	3928	Jackson	Anthony	\$495.57	\$73.05	\$568.62	\$495.57	\$0.00
307	108839	Jackson	Frederick	\$2,776.86	\$409.32	\$3,186.18	\$3,154.65	(\$377.79)
308	3701	Jackson	Willie	\$2,678.80	\$394.87	\$3,073.67	\$3,577.43	(\$898.63)
309	107992	Jacobi	Donald	\$1,157.97	\$170.69	\$1,328.66	\$1,157.97	\$0.00
310	20466	Jafarian	Moharram	\$13.55	\$2.00	\$15.55	\$13.55	\$0.00
311	2412	Jelancic	Vladko	\$1,366.25	\$201.39	\$1,567.64	\$1,773.01	(\$406.76)
312	3851	Jellison	Charles	\$327.35	\$48.25	\$375.60	\$513.14	(\$185.79)
313	3315	Jimenez	Michael	\$814.06	\$120.00	\$934.05	\$1,010.10	(\$196.04)
314	3539	Johnson	Brian	\$62.39	\$9.20	\$71.59	\$62.39	\$0.00
315	3898	Johnson	Cary	\$91.90	\$13.55	\$105.44	\$91.90	\$0.00
316	3151	Johnson	Kennard	\$778.01	\$114.68	\$892.69	\$1,770.30	(\$992.29)
317	3844	Johnson	Richard	\$162.40	\$23.94	\$186.34	\$162.40	\$0.00
318	2127	Johnson	Rodney	\$44.73	\$6.59	\$51.32	\$206.39	(\$161.66)
319	3602	Johnson	Tony	\$377.73	\$55.68	\$433.41	\$377.73	\$0.00
320	2253	Jones	Glenn	\$1,337.83	\$197.20	\$1,535.03	\$1,731.80	(\$393.97)
321	3784	Joseph	Leroy	\$2,440.47	\$359.74	\$2,800.21	\$2,570.69	(\$130.22)
322	3919	Kabbaz	David	\$76.92	\$11.34	\$88.26	\$76.92	\$0.00
323	111813	Kadir	Tura	\$23.88	\$3.52	\$27.39	\$23.88	\$0.00
324	106642	Kadri	Abdelkrim	\$10.24	\$1.51	\$11.75	\$10.24	\$0.00
325	3772	Kaiyoorawongs	Chaipan	\$3,065.66	\$451.89	\$3,517.55	\$3,065.66	\$0.00
326	101942	Kalimba	Gaston	\$530.48	\$78.19	\$608.67	\$530.48	\$0.00
327	29542	Kang	Chong	\$101.83	\$15.01	\$116.84	\$101.83	\$0.00
328	3631	Karner	Adam	\$873.51	\$128.76	\$1,002.27	\$1,141.88	(\$268.37)
329	3819	Keba	Woldmarim	\$569.14	\$83.89	\$653.03	\$998.90	(\$429.76)
330	106153	Keller	Roger	\$390.90	\$57.62	\$448.52	\$390.90	\$0.00
331	2736	Kenary	Brian	\$352.09	\$51.90	\$403.99	\$1,706.10	(\$1,354.01)
332	3484	Kern	Gary	\$8,416.88	\$1,240.68	\$9,657.56	\$9,357.54	(\$940.66)
333	3637	Key	Roy	\$174.71	\$25.75	\$200.46	\$174.71	\$0.00
334	3651	Khan	Zaka	\$53.04	\$7.82	\$60.86	\$53.04	\$0.00
335	105794	Kimler	Ryan	\$198.87	\$29.31	\$228.19	\$198.87	\$0.00
336	3798	King Jr.	John	\$115.51	\$17.03	\$132.54	\$179.87	(\$64.36)
337	2901	Kingsley	David	\$49.73	\$7.33	\$57.06	\$49.73	\$0.00
338	111283	Kissel	Sean	\$51.23	\$7.55	\$58.78	\$51.23	\$0.00
339	3893	Klein	Phillip	\$3,633.02	\$535.52	\$4,168.54	\$3,633.02	\$0.00
340	3837	Knight	Tyree	\$262.37	\$38.67	\$301.04	\$262.37	\$0.00
341	3630	Kogan	Martin	\$6,773.74	\$998.48	\$7,772.22	\$7,609.17	(\$835.43)
342	2789	Krouse	Stephen	\$85.40	\$12.59	\$97.99	\$366.44	(\$281.04)
343	103826	Kull Jr.	William	\$135.94	\$20.04	\$155.98	\$135.94	\$0.00
344	3662	Kunik	Robert	\$301.44	\$44.43	\$345.87	\$301.44	\$0.00
345	3878	Laico	Paul	\$102.52	\$15.11	\$117.63	\$102.52	\$0.00

	A	B	C	D	E	F	G	H
346	111231	Lant	Mark	\$694.00	\$102.30	\$796.29	\$694.00	\$0.00
347	3535	Lantis	Glen	\$427.48	\$63.01	\$490.49	\$427.48	\$0.00
348	25362	Lathan	Joseph	\$269.57	\$39.73	\$309.30	\$269.57	\$0.00
349	111290	Lay	Gilbert	\$139.80	\$20.61	\$160.40	\$139.80	\$0.00
350	1053	Leacock	Brian	\$1,191.71	\$175.66	\$1,367.37	\$2,396.09	(\$1,204.38)
351	3685	Leal	Jill	\$2,181.82	\$321.61	\$2,503.43	\$2,592.70	(\$410.88)
352	18960	Lee	Melvin	\$469.33	\$69.18	\$538.51	\$469.33	\$0.00
353	3702	Lee	Thomas	\$2,952.81	\$435.26	\$3,388.06	\$2,952.81	\$0.00
354	3666	Legesse	Dereje	\$555.76	\$81.92	\$637.68	\$776.75	(\$220.99)
355	3816	Ligus	Thomas	\$219.63	\$32.37	\$252.01	\$219.63	\$0.00
356	25522	Link	Peter	\$1,062.97	\$156.69	\$1,219.66	\$1,366.79	(\$303.82)
357	3681	Linzer	Steven	\$42.56	\$6.27	\$48.83	\$42.56	\$0.00
358	15804	Little	Dennis	\$742.99	\$109.52	\$852.50	\$1,016.34	(\$273.35)
359	3945	Lombana	Francisco	\$51.80	\$7.63	\$59.43	\$51.80	\$0.00
360	3858	Lonbani	Khosro	\$607.51	\$89.55	\$697.06	\$829.71	(\$222.20)
361	111405	Lopez-Silvero	Fidel	\$81.02	\$11.94	\$92.96	\$81.02	\$0.00
362	3752	Lorenz	Dierdra	\$866.03	\$127.66	\$993.69	\$866.03	\$0.00
363	3813	Lovelady	Warren	\$11.90	\$1.75	\$13.65	\$11.90	\$0.00
364	1065	Lovin	Charles	\$247.32	\$36.46	\$283.77	\$422.42	(\$175.10)
365	3778	Macato	Jaime	\$2,456.61	\$362.11	\$2,818.73	\$2,859.72	(\$403.11)
366	20936	Madi	Adam	\$137.47	\$20.26	\$157.74	\$137.47	\$0.00
367	24918	Magana	Luis	\$565.73	\$83.39	\$649.12	\$749.60	(\$183.87)
368	107940	Maharit	Khamkhung	\$63.98	\$9.43	\$73.41	\$63.98	\$0.00
369	2738	Mahoney	Kevin	\$431.90	\$63.66	\$495.56	\$431.90	\$0.00
370	3096	Mainwaring	David	\$3,079.08	\$453.87	\$3,532.95	\$3,079.08	\$0.00
371	2757	Majors	John	\$6,888.13	\$1,015.34	\$7,903.46	\$6,888.13	\$0.00
372	22809	Manitien	Ted	\$13.83	\$2.04	\$15.87	\$13.83	\$0.00
373	3890	Manor	Quincy	\$1,366.55	\$201.44	\$1,567.99	\$1,544.98	(\$178.43)
374	3583	Maras	Maria	\$2,195.44	\$323.62	\$2,519.05	\$2,614.23	(\$418.79)
375	106666	Martinez	Arturo	\$63.48	\$9.36	\$72.83	\$63.48	\$0.00
376	110053	Martinez	Francisco	\$1,713.26	\$252.54	\$1,965.80	\$1,713.26	\$0.00
377	3866	Martinez-Ramire	Eduardo	\$757.35	\$111.64	\$868.98	\$1,043.05	(\$285.70)
378	100287	Martins	Julio	\$298.27	\$43.97	\$342.24	\$298.27	\$0.00
379	3698	Mastrio	Angelo	\$287.39	\$42.36	\$329.75	\$287.39	\$0.00
380	110618	Mastrio	Pamela	\$234.23	\$34.53	\$268.76	\$234.23	\$0.00
381	110108	Mathis	George	\$297.42	\$43.84	\$341.26	\$297.42	\$0.00
382	3669	Maza	Inez	\$349.93	\$51.58	\$401.51	\$349.93	\$0.00
383	111284	McCall	Melvin	\$169.85	\$25.04	\$194.88	\$169.85	\$0.00
384	111199	McCarroll-Jones	Claudia	\$17.52	\$2.58	\$20.11	\$17.52	\$0.00
385	2587	McCarter	Patrick	\$2,149.19	\$316.80	\$2,465.99	\$2,268.60	(\$119.41)
386	3690	McCarthy	John	\$3,474.77	\$512.20	\$3,986.97	\$4,182.28	(\$707.51)
387	3654	McConnell	Therral	\$873.55	\$128.77	\$1,002.32	\$873.55	\$0.00
388	3743	McCoubrey	Earl	\$1,347.94	\$198.69	\$1,546.63	\$1,347.94	\$0.00
389	107427	McDougle	Jeffrey	\$124.87	\$18.41	\$143.27	\$124.87	\$0.00
390	3111	McGarry	James	\$178.50	\$26.31	\$204.81	\$178.50	\$0.00
391	3745	McGowan	Sean	\$228.69	\$33.71	\$262.40	\$228.69	\$0.00
392	3547	McGregor	Matthew	\$857.64	\$126.42	\$984.05	\$857.64	\$0.00
393	3722	McNeece	James	\$147.35	\$21.72	\$169.07	\$147.35	\$0.00
394	25641	McSkimming	John	\$901.92	\$132.95	\$1,034.87	\$901.92	\$0.00
395	3345	Mekonen	Solomon	\$383.94	\$56.59	\$440.54	\$383.94	\$0.00

	A	B	C	D	E	F	G	H
396	3066	Melesse	Abebe	\$32.85	\$4.84	\$37.69	\$32.85	\$0.00
397	3665	Melka	Tariku	\$27.31	\$4.03	\$31.34	\$27.31	\$0.00
398	2596	Meloro	Paul	\$3,253.76	\$479.62	\$3,733.38	\$3,503.79	(\$250.03)
399	3262	Mengesha	Alemayehu	\$521.70	\$76.90	\$598.60	\$861.06	(\$339.36)
400	3568	Menocal	Pedro	\$1,029.70	\$151.78	\$1,181.48	\$1,029.70	\$0.00
401	102328	Meyer	Ronald	\$53.72	\$7.92	\$61.64	\$53.72	\$0.00
402	26609	Mezzenasco	Pedro	\$1,317.06	\$194.14	\$1,511.19	\$1,523.84	(\$206.78)
403	110334	Michilena	Luis	\$66.26	\$9.77	\$76.03	\$66.26	\$0.00
404	30196	Miller	Jason	\$983.37	\$144.95	\$1,128.32	\$983.37	\$0.00
405	17855	Milliron	Darrol	\$1,696.99	\$250.14	\$1,947.13	\$3,469.18	(\$1,772.19)
406	3620	Mindyas	James	\$579.57	\$85.43	\$665.00	\$855.65	(\$276.08)
407	3904	Mirkulovski	Danny	\$550.09	\$81.09	\$631.18	\$550.09	\$0.00
408	31966	Mitrikov	Ilko	\$2,230.42	\$328.77	\$2,559.19	\$2,414.03	(\$183.61)
409	104887	Miyazaki	Nisaburo	\$912.41	\$134.49	\$1,046.90	\$912.41	\$0.00
410	3317	Mogeeth	Ehab	\$323.43	\$47.67	\$371.10	\$323.43	\$0.00
411	105284	Monforte II	Peter	\$5,074.87	\$748.06	\$5,822.92	\$5,074.87	\$0.00
412	3882	Monteagudo	Oscar	\$937.81	\$138.24	\$1,076.04	\$937.81	\$0.00
413	3735	Montoya Villa	Francisco	\$551.62	\$81.31	\$632.93	\$1,112.68	(\$561.06)
414	3913	Moore	Aileen-Louise	\$328.57	\$48.43	\$377.01	\$328.57	\$0.00
415	3664	Moreno	James	\$4,373.10	\$644.61	\$5,017.71	\$5,220.56	(\$847.46)
416	3626	Moretti	Bryan	\$1,422.89	\$209.74	\$1,632.63	\$1,422.89	\$0.00
417	3411	Morley	David	\$514.74	\$75.87	\$590.61	\$718.67	(\$203.93)
418	2162	Morris	Robert	\$1,446.92	\$213.28	\$1,660.20	\$1,446.92	\$0.00
419	8321	Morris	Thomas	\$4,599.67	\$678.01	\$5,277.68	\$4,599.67	\$0.00
420	106703	Mosely	David	\$1,143.38	\$168.54	\$1,311.92	\$1,143.38	\$0.00
421	3785	Mostafa	Ahmed	\$500.20	\$73.73	\$573.93	\$500.20	\$0.00
422	28917	Motazedi	Kamran	\$181.66	\$26.78	\$208.44	\$181.66	\$0.00
423	27059	Mottaghian	Joseph	\$30.98	\$4.57	\$35.54	\$30.98	\$0.00
424	107704	Muhtari	Abdulrahman	\$615.74	\$90.76	\$706.50	\$615.74	\$0.00
425	3847	Murawski	Richard	\$1,593.10	\$234.83	\$1,827.93	\$1,593.10	\$0.00
426	3856	Murray	Mark	\$23.74	\$3.50	\$27.24	\$23.74	\$0.00
427	2018	Murray	Michael P.	\$770.33	\$113.55	\$883.88	\$770.33	\$0.00
428	107440	Nantista	Peter	\$212.28	\$31.29	\$243.57	\$212.28	\$0.00
429	3859	Nazarov	Mikael	\$2,455.84	\$362.00	\$2,817.84	\$2,736.49	(\$280.65)
430	3804	Ndichu	Simon	\$366.18	\$53.98	\$420.16	\$366.18	\$0.00
431	102656	Nedyalkov	Atanas	\$321.59	\$47.40	\$369.00	\$321.59	\$0.00
432	3530	Negashe	Legesse	\$502.82	\$74.12	\$576.93	\$838.75	(\$335.93)
433	111494	Nemeth	Zoltan	\$353.54	\$52.11	\$405.65	\$353.54	\$0.00
434	25190	Ngo	Tuan	\$1,607.52	\$236.95	\$1,844.47	\$1,607.52	\$0.00
435	3545	Nichols	Keith	\$336.29	\$49.57	\$385.86	\$336.29	\$0.00
436	3823	Nigussie	Gulilat	\$480.17	\$70.78	\$550.95	\$620.79	(\$140.62)
437	28989	Nolan	Eamonn	\$107.87	\$15.90	\$123.77	\$107.87	\$0.00
438	3639	Norberg	Christopher	\$919.23	\$135.50	\$1,054.73	\$996.85	(\$77.62)
439	3876	Norvell	Chris	\$4,691.89	\$691.60	\$5,383.49	\$4,691.89	\$0.00
440	3841	Ocampo	Leonardo	\$882.56	\$130.09	\$1,012.66	\$967.99	(\$85.43)
441	30295	Ogbazghi	Dawit	\$489.50	\$72.15	\$561.65	\$1,075.06	(\$585.56)
442	109172	O'Grady	Francis	\$404.46	\$59.62	\$464.08	\$404.46	\$0.00
443	3836	Ohlson	Ryan	\$752.25	\$110.89	\$863.14	\$924.94	(\$172.69)
444	3753	Olen	Virginia	\$2,224.07	\$327.84	\$2,551.91	\$2,224.07	\$0.00
445	3748	Oliveros	Mario	\$671.02	\$98.91	\$769.93	\$671.02	\$0.00

	A	B	C	D	E	F	G	H
446	3868	Olson	Eric	\$514.53	\$75.84	\$590.38	\$514.53	\$0.00
447	3644	Ontura	Tesfalem	\$259.20	\$38.21	\$297.41	\$259.20	\$0.00
448	3934	Orr	Mark	\$147.62	\$21.76	\$169.38	\$147.62	\$0.00
449	104938	Ortega	Paul	\$47.24	\$6.96	\$54.20	\$47.24	\$0.00
450	3863	Ortega	Saul	\$439.49	\$64.78	\$504.27	\$439.49	\$0.00
451	3894	O'Shea	Kevin	\$163.81	\$24.15	\$187.96	\$163.81	\$0.00
452	25832	Osterman	Victor	\$209.00	\$30.81	\$239.81	\$683.24	(\$474.24)
453	3783	Overson	Michael	\$636.00	\$93.75	\$729.74	\$636.00	\$0.00
454	3789	Oyebade	Vincent	\$116.31	\$17.14	\$133.45	\$116.31	\$0.00
455	3717	Ozgulgec	Tunc	\$1,477.21	\$217.75	\$1,694.95	\$1,626.46	(\$149.25)
456	3618	Pak	Kon	\$374.87	\$55.26	\$430.13	\$374.87	\$0.00
457	106025	Paone	Chris	\$1,093.84	\$161.24	\$1,255.08	\$1,093.84	\$0.00
458	3597	Pariso	David	\$4,792.27	\$706.40	\$5,498.67	\$5,508.79	(\$716.52)
459	109637	Park	Danny	\$38.85	\$5.73	\$44.58	\$38.85	\$0.00
460	16676	Parker	Gary	\$1,387.79	\$204.57	\$1,592.35	\$1,387.79	\$0.00
461	3750	Parker	Shawnette	\$481.18	\$70.93	\$552.10	\$713.53	(\$232.35)
462	3884	Parmenter	William	\$1,713.94	\$252.64	\$1,966.58	\$1,713.94	\$0.00
463	3659	Paros	Nicholas	\$14.71	\$2.17	\$16.88	\$14.71	\$0.00
464	19858	Passera	Charles	\$65.93	\$9.72	\$75.64	\$65.93	\$0.00
465	3624	Patry	Michael	\$2,186.37	\$322.28	\$2,508.64	\$2,583.67	(\$397.30)
466	3932	Patton	Dorothy	\$43.03	\$6.34	\$49.37	\$43.03	\$0.00
467	112811	Peace	Kimberly	\$241.57	\$35.61	\$277.18	\$241.57	\$0.00
468	29536	Peacock	Paula	\$118.57	\$17.48	\$136.04	\$118.57	\$0.00
469	3806	Pearson	Jon	\$988.94	\$145.77	\$1,134.71	\$1,150.94	(\$162.00)
470	31112	Peer	Yuda	\$82.53	\$12.16	\$94.69	\$82.53	\$0.00
471	3396	Penera	Eric	\$124.81	\$18.40	\$143.21	\$279.36	(\$154.55)
472	3834	Perrotti	Dominic	\$343.23	\$50.59	\$393.82	\$421.61	(\$78.38)
473	111257	Petculescu	Ciprian	\$28.97	\$4.27	\$33.24	\$28.97	\$0.00
474	15968	Peterson	Kenneth	\$732.68	\$108.00	\$840.68	\$732.68	\$0.00
475	1076	Peterson	Steven	\$3,201.15	\$471.86	\$3,673.01	\$3,201.15	\$0.00
476	3736	Petrie	Theodore	\$49.32	\$7.27	\$56.59	\$49.32	\$0.00
477	3740	Petrossian	Robert	\$678.86	\$100.07	\$778.92	\$678.86	\$0.00
478	106089	Phillips	Larry	\$881.80	\$129.98	\$1,011.78	\$881.80	\$0.00
479	3281	Phonesavanh	Paul	\$742.40	\$109.43	\$851.84	\$742.40	\$0.00
480	3523	Pilkington	Margaret	\$1,706.19	\$251.50	\$1,957.69	\$2,529.94	(\$823.75)
481	107617	Pineda	Carlos	\$2,994.17	\$441.35	\$3,435.52	\$2,994.17	\$0.00
482	2826	Pitts	Amir	\$649.35	\$95.72	\$745.07	\$884.48	(\$235.13)
483	2407	Platania	John	\$556.69	\$82.06	\$638.75	\$1,038.00	(\$481.31)
484	3265	Pletz	David	\$2,188.91	\$322.65	\$2,511.56	\$3,207.86	(\$1,018.95)
485	3647	Pohl	Daniel	\$186.19	\$27.45	\$213.64	\$186.19	\$0.00
486	26679	Polchinski	Paul	\$111.37	\$16.42	\$127.78	\$111.37	\$0.00
487	31149	Pony	David	\$51.52	\$7.59	\$59.11	\$51.52	\$0.00
488	3563	Portillo	Mario	\$593.50	\$87.48	\$680.98	\$593.50	\$0.00
489	3201	Presnall	Darryl	\$379.09	\$55.88	\$434.97	\$508.92	(\$129.83)
490	3800	Price	Allen	\$630.95	\$93.00	\$723.95	\$630.95	\$0.00
491	2568	Price	James	\$1,491.52	\$219.86	\$1,711.38	\$2,971.90	(\$1,480.38)
492	3449	Prifti	Ilia	\$418.70	\$61.72	\$480.42	\$418.70	\$0.00
493	26363	Punzalan	Luciano	\$236.08	\$34.80	\$270.87	\$236.08	\$0.00
494	3687	Purdue	Robert	\$210.21	\$30.99	\$241.20	\$312.22	(\$102.01)
495	3556	Pyles	Joseph	\$682.49	\$100.60	\$783.09	\$682.49	\$0.00

	A	B	C	D	E	F	G	H
496	107548	Rainey	James	\$219.28	\$32.32	\$251.60	\$219.28	\$0.00
497	3883	Ramirez	Erney	\$760.59	\$112.11	\$872.70	\$760.59	\$0.00
498	3525	Rasheed	Willie	\$4,016.07	\$591.98	\$4,608.05	\$4,016.07	\$0.00
499	3812	Ray	William	\$12.61	\$1.86	\$14.47	\$12.61	\$0.00
500	108758	Regans	Mark	\$379.98	\$56.01	\$435.99	\$379.98	\$0.00
501	2237	Relopez	Craig	\$1,606.09	\$236.74	\$1,842.84	\$2,373.26	(\$767.17)
502	3544	Reno	Michael	\$3,828.40	\$564.32	\$4,392.72	\$3,828.40	\$0.00
503	14261	Riipi	Karl	\$126.47	\$18.64	\$145.11	\$126.47	\$0.00
504	109502	Rios-Lopez	Oscar	\$189.76	\$27.97	\$217.73	\$189.76	\$0.00
505	107701	Risby	Clifford	\$1,060.42	\$156.31	\$1,216.73	\$1,060.42	\$0.00
506	111756	Risco	Pedro	\$554.56	\$81.74	\$636.30	\$554.56	\$0.00
507	3191	Rivas	Victor	\$1,260.33	\$185.78	\$1,446.11	\$1,260.33	\$0.00
508	104109	Rivero-Vera	Raul	\$288.88	\$42.58	\$331.46	\$288.88	\$0.00
509	101317	Rivers	Willie	\$642.53	\$94.71	\$737.24	\$642.53	\$0.00
510	3575	Roach	Jayson	\$665.36	\$98.08	\$763.44	\$665.36	\$0.00
511	3305	Roberson	Ronnie	\$101.24	\$14.92	\$116.16	\$101.24	\$0.00
512	2842	Roberts	James	\$765.95	\$112.90	\$878.85	\$765.95	\$0.00
513	104171	Robinson	Mikalani	\$398.94	\$58.81	\$457.75	\$398.94	\$0.00
514	3629	Robles	Mark	\$49.78	\$7.34	\$57.11	\$49.78	\$0.00
515	3744	Rockett Jr.	Roosevelt	\$81.28	\$11.98	\$93.26	\$81.28	\$0.00
516	31847	Rodriguez	Armando	\$30.79	\$4.54	\$35.33	\$30.79	\$0.00
517	3814	Rohlas	Polly	\$2,985.34	\$440.05	\$3,425.39	\$3,615.12	(\$629.78)
518	3874	Romano	Anthony	\$1,169.52	\$172.39	\$1,341.91	\$1,306.60	(\$137.08)
519	3587	Romero	Ruben	\$687.24	\$101.30	\$788.54	\$687.24	\$0.00
520	3225	Ross	Larry	\$74.22	\$10.94	\$85.15	\$74.22	\$0.00
521	108742	Ross	Lee	\$174.37	\$25.70	\$200.07	\$174.37	\$0.00
522	3850	Rothenberg	Edward	\$239.11	\$35.25	\$274.36	\$239.11	\$0.00
523	3504	Rotich	Emertha	\$1,336.67	\$197.03	\$1,533.69	\$1,336.67	\$0.00
524	3912	Rousseau	James	\$657.44	\$96.91	\$754.35	\$657.44	\$0.00
525	3693	Ruby	Melissa	\$265.99	\$39.21	\$305.20	\$265.99	\$0.00
526	3477	Ruiz	Travis	\$586.19	\$86.41	\$672.60	\$586.19	\$0.00
527	3875	Russell	Darrell	\$657.42	\$96.91	\$754.33	\$657.42	\$0.00
528	3944	Sadler	James	\$82.91	\$12.22	\$95.13	\$82.91	\$0.00
529	3323	Saevitz	Neil	\$278.09	\$40.99	\$319.08	\$278.09	\$0.00
530	3169	Salameh	George	\$1,081.12	\$159.36	\$1,240.48	\$1,641.37	(\$560.25)
531	3042	Saleh	Jemal	\$4,948.30	\$729.40	\$5,677.69	\$4,948.30	\$0.00
532	103096	Sam	Phea	\$625.84	\$92.25	\$718.09	\$625.84	\$0.00
533	21811	Sameli	Sabino	\$921.22	\$135.79	\$1,057.01	\$921.22	\$0.00
534	100128	Sampson	James	\$644.31	\$94.97	\$739.28	\$644.31	\$0.00
535	109349	Sanchez-Ramos	Natasha	\$288.44	\$42.52	\$330.96	\$288.44	\$0.00
536	3570	Sanders	Acy	\$737.61	\$108.73	\$846.33	\$737.61	\$0.00
537	29769	Sans	Thomas	\$769.01	\$113.35	\$882.36	\$769.01	\$0.00
538	3915	Sapienza	Gino	\$261.74	\$38.58	\$300.32	\$261.74	\$0.00
539	3648	Saravanos	John	\$5,143.32	\$758.15	\$5,901.46	\$5,143.32	\$0.00
540	26687	Sargeant	Michael	\$164.64	\$24.27	\$188.91	\$164.64	\$0.00
541	105273	Sayed	Jamil	\$645.44	\$95.14	\$740.58	\$904.94	(\$259.50)
542	106913	Schraeder	Scott	\$569.96	\$84.01	\$653.98	\$569.96	\$0.00
543	25981	Schroeder	William	\$2,110.35	\$311.07	\$2,421.42	\$2,110.35	\$0.00
544	29172	Schwartz	George	\$601.41	\$88.65	\$690.06	\$601.41	\$0.00
545	3313	Schwartz	Steven	\$2,316.43	\$341.45	\$2,657.88	\$2,316.43	\$0.00

	A	B	C	D	E	F	G	H
546	109028	Secondo	Muridi	\$391.43	\$57.70	\$449.12	\$391.43	\$0.00
547	3536	Sedgwick	Anthony	\$129.38	\$19.07	\$148.45	\$129.38	\$0.00
548	3134	Serio	John	\$766.46	\$112.98	\$879.43	\$1,119.04	(\$352.58)
549	3057	Serrano	Hector	\$1,692.22	\$249.44	\$1,941.65	\$2,188.03	(\$495.81)
550	3359	Sevillet	Otto	\$136.93	\$20.18	\$157.11	\$390.65	(\$253.72)
551	3879	Sexner	Alexis	\$955.88	\$140.90	\$1,096.77	\$1,075.72	(\$119.84)
552	19451	Shafiei	Abdolreza	\$552.17	\$81.39	\$633.56	\$552.17	\$0.00
553	2899	Shallufa	Azmy	\$5,575.23	\$821.81	\$6,397.04	\$6,060.24	(\$485.01)
554	3619	Shein	Efraim	\$304.28	\$44.85	\$349.13	\$304.28	\$0.00
555	103821	Sherman	Jason	\$214.72	\$31.65	\$246.37	\$214.72	\$0.00
556	3724	Shinn	Kevin	\$463.14	\$68.27	\$531.41	\$463.14	\$0.00
557	3790	Shoyombo	Rilwan	\$1,426.49	\$210.27	\$1,636.76	\$1,833.70	(\$407.21)
558	3803	Siasat	Manuel	\$32.38	\$4.77	\$37.15	\$32.38	\$0.00
559	112766	Sibre	Christopher	\$294.20	\$43.37	\$337.56	\$294.20	\$0.00
560	3758	Siegel	Jeffrey	\$91.32	\$13.46	\$104.78	\$91.32	\$0.00
561	105863	Siljkovic	Becir	\$1,854.68	\$273.39	\$2,128.06	\$2,017.09	(\$162.41)
562	23388	Simmons	John	\$202.71	\$29.88	\$232.59	\$1,215.13	(\$1,012.42)
563	3524	Sinay	Abraham	\$234.31	\$34.54	\$268.85	\$234.31	\$0.00
564	3677	Singh	Baldev	\$180.81	\$26.65	\$207.47	\$180.81	\$0.00
565	3683	Sitotaw	Haileab	\$118.59	\$17.48	\$136.06	\$118.59	\$0.00
566	2630	Smale	Charles	\$935.99	\$137.97	\$1,073.96	\$935.99	\$0.00
567	3870	Smith	Jepthy	\$284.41	\$41.92	\$326.33	\$484.69	(\$200.28)
568	3041	Smith	Lottie	\$3,051.10	\$449.74	\$3,500.84	\$3,051.10	\$0.00
569	3610	Smith Jr.	Willie	\$1,287.44	\$189.77	\$1,477.21	\$2,123.86	(\$836.42)
570	2667	Solares	John	\$453.45	\$66.84	\$520.29	\$453.45	\$0.00
571	3643	Solis	Brigido	\$174.25	\$25.69	\$199.94	\$174.25	\$0.00
572	22804	Solymar	Istvan	\$303.84	\$44.79	\$348.63	\$303.84	\$0.00
573	3854	Soree	Mladen	\$1,445.54	\$213.08	\$1,658.62	\$1,445.54	\$0.00
574	105304	Sorkin	Jack	\$336.28	\$49.57	\$385.85	\$336.28	\$0.00
575	3770	Sorrosa	Juan	\$1,888.94	\$278.44	\$2,167.38	\$2,214.82	(\$325.88)
576	2638	Soto	Jacob	\$118.06	\$17.40	\$135.46	\$403.15	(\$285.09)
577	3797	Soto	Johnny	\$196.46	\$28.96	\$225.41	\$352.89	(\$156.43)
578	3727	Sparks	Cody	\$19.56	\$2.88	\$22.45	\$19.56	\$0.00
579	3845	Spaulding	Ross	\$244.25	\$36.00	\$280.25	\$244.25	\$0.00
580	3055	Spilmon	Mark	\$4,644.48	\$684.62	\$5,329.10	\$5,281.80	(\$637.32)
581	3481	Springer	Marvin	\$852.53	\$125.67	\$978.20	\$852.53	\$0.00
582	111364	Stanley	John	\$286.26	\$42.20	\$328.46	\$286.26	\$0.00
583	3821	Stauff	John	\$113.93	\$16.79	\$130.72	\$113.93	\$0.00
584	3737	Stayton	William	\$119.03	\$17.55	\$136.57	\$119.03	\$0.00
585	109013	Stearns	Thomas	\$528.37	\$77.88	\$606.25	\$528.37	\$0.00
586	3757	Steck	Gregory	\$5,829.47	\$859.29	\$6,688.75	\$6,511.90	(\$682.43)
587	3625	Stephanov	Liuben	\$219.81	\$32.40	\$252.21	\$398.92	(\$179.11)
588	3695	Stern	Robert	\$292.29	\$43.08	\$335.37	\$292.29	\$0.00
589	3165	Stevenson	John	\$1,702.39	\$250.94	\$1,953.33	\$1,702.39	\$0.00
590	3872	Stockton	Clarence	\$1,336.84	\$197.06	\$1,533.89	\$1,336.84	\$0.00
591	3713	Stonebreaker	Dawn	\$1,992.26	\$293.67	\$2,285.92	\$2,489.85	(\$497.59)
592	102400	Talley	George	\$301.76	\$44.48	\$346.24	\$301.76	\$0.00
593	112063	Tapia-Vergara	Agustin	\$587.64	\$86.62	\$674.26	\$587.64	\$0.00
594	3338	Tarragano	Stephen	\$675.03	\$99.50	\$774.54	\$675.03	\$0.00
595	111807	Taylor	Brent	\$632.29	\$93.20	\$725.49	\$632.29	\$0.00

	A	B	C	D	E	F	G	H
596	109745	Taylor	David	\$324.21	\$47.79	\$372.00	\$324.21	\$0.00
597	31977	Taylor	Marvin	\$714.56	\$105.33	\$819.89	\$714.56	\$0.00
598	3728	Tedros	Biserat	\$405.38	\$59.75	\$465.13	\$588.25	(\$182.87)
599	3720	Terry	James	\$937.23	\$138.15	\$1,075.38	\$937.23	\$0.00
600	31400	Thomas	Cator	\$427.93	\$63.08	\$491.01	\$427.93	\$0.00
601	104732	Thomas	Hasan	\$247.81	\$36.53	\$284.34	\$247.81	\$0.00
602	3726	Thomas	Scott	\$2,673.14	\$394.03	\$3,067.17	\$2,673.14	\$0.00
603	3867	Thompson	Glen	\$2,921.34	\$430.62	\$3,351.95	\$2,921.34	\$0.00
604	27963	Thompson	Michael	\$6,744.25	\$994.13	\$7,738.38	\$7,044.25	(\$300.00)
605	29040	Timko	Robert	\$224.07	\$33.03	\$257.09	\$224.07	\$0.00
606	110796	Toka	Tamas	\$445.88	\$65.72	\$511.60	\$445.88	\$0.00
607	22120	Travis	Brian	\$753.92	\$111.13	\$865.05	\$1,472.90	(\$718.98)
608	104747	Trumpf	Robert	\$211.10	\$31.12	\$242.22	\$211.10	\$0.00
609	103413	Tsegaye	Miheret	\$51.23	\$7.55	\$58.78	\$51.23	\$0.00
610	3207	Tucker	Kenlon	\$2,786.14	\$410.69	\$3,196.83	\$2,786.14	\$0.00
611	3679	Tullao	Isaac	\$411.83	\$60.71	\$472.54	\$411.83	\$0.00
612	3880	Turner	Michael	\$39.72	\$5.86	\$45.58	\$39.72	\$0.00
613	3686	Tyler	Christopher	\$267.85	\$39.48	\$307.33	\$267.85	\$0.00
614	110836	Uba	Chima	\$201.50	\$29.70	\$231.20	\$201.50	\$0.00
615	3612	Ullah	Mohammad	\$90.03	\$13.27	\$103.30	\$90.03	\$0.00
616	3073	Urban	David	\$102.49	\$15.11	\$117.60	\$102.49	\$0.00
617	3792	Urbanski	Anthony	\$1,411.23	\$208.02	\$1,619.25	\$1,411.23	\$0.00
618	3668	Valdes	Lazaro	\$162.21	\$23.91	\$186.12	\$162.21	\$0.00
619	3640	Vanluven	RJ	\$1,726.16	\$254.44	\$1,980.60	\$1,726.16	\$0.00
620	3710	Vences	Alfredo	\$839.90	\$123.81	\$963.71	\$839.90	\$0.00
621	3721	Viado	Ramon	\$2,051.73	\$302.43	\$2,354.16	\$2,369.87	(\$318.14)
622	3682	VonEngel	Stephen	\$29.89	\$4.41	\$34.30	\$29.89	\$0.00
623	3796	Vongthep	Christopher	\$2,710.64	\$399.56	\$3,110.20	\$2,710.64	\$0.00
624	109475	Vonkageler	Mark	\$130.27	\$19.20	\$149.48	\$130.27	\$0.00
625	3842	Wagg	John	\$221.46	\$32.64	\$254.10	\$221.46	\$0.00
626	3776	Wakeel	Daud	\$679.94	\$100.23	\$780.16	\$679.94	\$0.00
627	28448	Walker	Arthur	\$114.57	\$16.89	\$131.46	\$114.57	\$0.00
628	3820	Wallace	Roy	\$3,681.35	\$542.65	\$4,224.00	\$3,681.35	\$0.00
629	3766	Warner	Terrance	\$1,694.50	\$249.78	\$1,944.27	\$2,356.86	(\$662.36)
630	3496	Weaver	Gerie	\$3,791.56	\$558.89	\$4,350.45	\$5,428.88	(\$1,637.32)
631	3826	Webb	Ricky	\$624.58	\$92.07	\$716.64	\$923.04	(\$298.46)
632	109066	Webster	Brock	\$254.41	\$37.50	\$291.91	\$254.41	\$0.00
633	3578	Weiss	Matthew	\$60.25	\$8.88	\$69.13	\$60.25	\$0.00
634	2785	Welborn	Paul	\$849.94	\$125.28	\$975.22	\$972.84	(\$122.90)
635	3632	Weldu	Berhane	\$266.45	\$39.28	\$305.73	\$266.45	\$0.00
636	3616	Welzbacher	Daniel	\$2,367.50	\$348.98	\$2,716.47	\$2,789.72	(\$422.22)
637	111878	White II	Prinest	\$153.22	\$22.59	\$175.81	\$153.22	\$0.00
638	3611	Williams	Danny	\$273.88	\$40.37	\$314.25	\$273.88	\$0.00
639	3608	Wilson Jr.	Mose	\$3,332.43	\$491.21	\$3,823.64	\$3,332.43	\$0.00
640	3947	Wing	Roland	\$81.95	\$12.08	\$94.04	\$81.95	\$0.00
641	107624	Witte	Daniel	\$228.39	\$33.67	\$262.05	\$228.39	\$0.00
642	3623	Wolde	Hailemariam	\$385.93	\$56.89	\$442.81	\$385.93	\$0.00
643	3603	Woldeghebriel	Berhane	\$1,037.22	\$152.89	\$1,190.11	\$1,037.22	\$0.00
644	110866	Wolfe	Thomas	\$726.91	\$107.15	\$834.06	\$726.91	\$0.00
645	3840	Wondired	Eshetu	\$423.24	\$62.39	\$485.63	\$423.24	\$0.00

	A	B	C	D	E	F	G	H
646	3910	Wong	Jorge	\$2,325.07	\$342.72	\$2,667.79	\$2,325.07	\$0.00
647	28160	Wong	Wanjin	\$1,115.61	\$164.45	\$1,280.06	\$1,115.61	\$0.00
648	3706	Woodall	Charles	\$610.19	\$89.94	\$700.13	\$610.19	\$0.00
649	3582	Workneh	Abent	\$36.29	\$5.35	\$41.63	\$36.29	\$0.00
650	3573	Worku	Abiye	\$253.73	\$37.40	\$291.13	\$253.73	\$0.00
651	108239	Wright	Edward	\$744.31	\$109.71	\$854.02	\$744.31	\$0.00
652	3092	Yabut	Gerry	\$3,163.13	\$466.26	\$3,629.39	\$3,284.17	(\$121.04)
653	108389	Yamaguchi	Alicia	\$3,089.15	\$455.35	\$3,544.50	\$3,089.15	\$0.00
654	3852	Yepiz-Patron	Ubaldo	\$18.78	\$2.77	\$21.54	\$18.78	\$0.00
655	3472	Yesayan	Razmik	\$23.30	\$3.43	\$26.73	\$23.30	\$0.00
656	3691	Yihdego	Abdulkadir	\$642.61	\$94.72	\$737.33	\$642.61	\$0.00
657	3633	Yimer	Yidersal	\$643.72	\$94.89	\$738.61	\$643.72	\$0.00
658	2081	Younes	Ahmed	\$228.31	\$33.65	\$261.96	\$228.31	\$0.00
659	17259	Yurckonis	Hilbert	\$2,395.57	\$353.12	\$2,748.69	\$2,395.57	\$0.00
660	3824	Zabadneh	Randa	\$167.13	\$24.64	\$191.77	\$167.13	\$0.00
661	30374	Zafar	John	\$605.99	\$89.33	\$695.32	\$605.99	\$0.00
662	2273	Zawoudie	Masfen	\$1,254.40	\$184.90	\$1,439.30	\$1,254.40	\$0.00
663	17936	Zekichev	Nick	\$324.17	\$47.78	\$371.95	\$324.17	\$0.00
664	3235	Zelege	Abraham	\$412.94	\$60.87	\$473.81	\$1,003.66	(\$590.72)

CERTIFICATE OF SERVICE

I certify that on March 29, 2022, I served a copy of the foregoing
PETITIONERS' APPENDIX VOLUME VI of VI upon all counsel of record
by the Court's ECF system which served all parties electronically.

Affirmed this 29th Day of March, 2022

/s/ Leon Greenberg

Leon Greenberg, Esq. (Bar # 8094)
A Professional Corporation
2965 S. Jones Blvd., Suite E-3
Las Vegas, Nevada 89146
(702) 383-6085