

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

COMES NOW, Real Party In Interest, VALLEY HEALTH SYSTEM, LLC dba DESERT SPRINGS HOSPITAL (“Desert Springs”), by and through its counsel of record, Hall Prangle & Schoonveld, LLC, and pursuant to Nevada Rules of Appellate Procedure 21(b)(2), 27(a)(1), and 28(i), hereby respectfully request leave to join in Petitioners Holavanahalli Keshava-Prasad, M.D. and H. Keshava-Prasad, PLLC’s Petition for Writ of Mandamus.

This joinder is made and based on the papers and pleadings on file herein, the Petition submitted by the Petitioners, and such other documentary evidence as may be presented and any oral arguments at the time of any hearing on this matter. Good cause exists for allowing Real Party In Interest Valley Health System LLC dba Desert Springs Hospital to join in Dr. Keshava-Prasad and H. Keshava-Prasad, PLLC’s Petition because the arguments and authorities submitted therein apply equally to Desert Springs which is alleged to be vicariously liable for Dr. Keshava-Prasad’s conduct in providing care and treatment to Lashawanda Watts. Because the interests are so aligned, a separate Petition for Writ of Mandamus from this moving party seeking reversal of the district court’s January 26, 2022 order denying Dr. Keshava-Prasad and H. Keshava-Prasad, PLLC’s Motion to Dismiss would not materially assist the Court its disposition of the issues presented by the

instant Petition.¹ Lastly, there is no prejudice to Respondents or Real Parties in Interest should Desert Springs be permitted to join as Petitioner in these proceedings.

For these reasons, Desert Springs respectfully requests leave to join Petitioners Dr. Keshava-Prasad and H. Keshava-Prasad, PLLC's Petition for Writ of Mandamus.

If this Motion is granted, Desert Springs will submit a check for \$250.00 for the filing fee, as set forth in NRAP 21(g).

DATED this 29th day of July 2022.

HALL PRANGLE & SCHOONVELD LLC

By: /s/ Tyson Dobbs, Esq.

TYSON J. DOBBS, ESQ.

Nevada Bar No.: 11953

TRENT L. EARL, ESQ.

Nevada Bar No. 15214

1140 N. Town Center Dr., Ste. 350

Las Vegas, NV 89144

Attorneys for Real Party In Interest Valley

Health System LLC dba Desert Springs

Hospital Medical Center

¹ Desert Springs will be filing a separate petition for writ of mandamus requesting this Court's review of another order entered by Respondent on January 26, 2022 denying Desert Springs' separately filed motion to partially dismiss Plaintiff's Complaint.

HALL PRANGLE & SCHOONVELD, LLC
1140 NORTH TOWN CENTER DRIVE, STE. 350
LAS VEGAS, NEVADA 89144
TELEPHONE: 702-889-6400 FACSIMILE: 702-384-6025

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 29th day of July 2022, I served a true and correct copy of the foregoing **REAL PARTY IN INTEREST HEALTH SYSTEM, LLC dba DESERT SPRINGS HOSPITAL MEDICAL CENTER'S JOINER TO HOLAVANAHALLI KESHAVA-PRASAD, M.D. AND H. KESHAVA PRASAD, M.D., PLLC'S PETITION FOR WRIT OF MANDAMUS** via the E-Service Master List for the above referenced matter in the Eighth Judicial District Court e-filing System in accordance with the electronic service requirements of Administrative Order 14-2 and the Nevada Electronic Filing and Conversion Rules, to the following:

The Honorable Gloria Sturman The Eighth Judicial District Court Regional Justice Center 200 Lewis Avenue Las Vegas, Nevada 89101 <i>Respondent</i>	Aaron Ford Attorney General Nevada Department of Justice 100 North Carson Street Carson City, Nevada 89701 <i>Counsel for Respondent</i>
William Brenske, Esq. Ryan Krametbauer, Esq. 3800 Howard Hughes Pkwy Suite 500 Las Vegas, NV 89169 <i>Attorneys for Plaintiff</i>	Gabriel A. Martinez, Esq. Dillon G. Coil, Esq. Taylor J. Smith, Esq. GREENMAN GOLDBERG RABY & MARTINEZ 2770 S. Maryland Pkwy., Suite 100 Las Vegas, NV 89109 Tel: 702.384.1616 Fax: 702.384.2990 gmartinez@ggrmlawfirm.com dcoil@ggrmlawfirm.com tsmith@ggrmlawfirm.com <i>Attorneys for Plaintiff Lashawanda Watts</i> <i>Attorneys for Real Parties In Interest</i>

Patricia Egan Daehnke, Esq.
Laura S. Lucero, Esq.
COLLINSON, DAEHNKE, INFLOW
& GRECO
2110 E. Flamingo Road
Suite 212
Las Vegas, NV 89119
Patricia.Daehnke@cdiglaw.com
Laura.Lucero@cdiglaw.com
Attorneys for Real Party in Interest
Amir Qureshi, M.D. and Roe Amir
Qureshi, M.D., Employer

JOHN H. COTTON, ESQ.
MICHAEL D. NAVRATIL, ESQ.
JOHN H. COTTON & ASSOCIATES,
LTD.
7900 W. Sahara Avenue, Suite 200 Las
Vegas, NV 89117
JHCotton@jhcottonlaw.com
MNavratil@jhcottonlaw.com *Attorneys*
for Real Party in Interest Tariq, D.O.
and Neurology Clinics of Nevada, LLC

S. BRENT VOGEL
Nevada Bar No. 6858
SHADY SIRSY
Nevada Bar No. 15818
Lewis Brisbois Bisgaard & Smith LLP
6385 South Rainbow Boulevard, Suite
600
Las Vegas, Nevada 89118 Tel: 702-893-
3383 Fax: 702-893-3789
Attorneys for Real Party in Interest
Holavanahalli Keshava-Prasad, M.D.,
and H. Keshava Prasad, MD, PLLC

Robert C. McBride, Esq.
Sean M. Kelly, Esq.
MCBRIDE HALL
8329 W. Sunset Road, Suite 260
Las Vegas, NV 89113
Tel: 702.792.5855
Fax: 702.796.5855
rcmcbride@mcbridehall.com
smkelly@mcbridehall.com
Attorneys for Real Party in Interest
Platinum Hospitalists, LLP, Roe Ali Haq,
M.D., Ali Haq, M.D., Charles Kim Danish

/s/ Nicole Etienne
An employee of HALL PRANGLE & SCHOONVELD, LLC