

Case No. 85850

In the Supreme Court of Nevada

A CAB SERIES LLC, f/k/a A CAB, LLC,

Appellant,

vs.

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

Respondents.

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Elizabeth A. Brown
Clerk of Supreme Court

APPEAL

from the Eighth Judicial District Court, Clark County
The Honorable MARIA GALL, District Judge
District Court Case No. A-12-669926-C

**APPELLANT'S APPENDIX
VOLUME 16
PAGES 3751-4000**

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203	Appellant’s Case Appeal Statement	12/14/22	23	5512–5516
129	Case Appeal Statement	08/12/20	11	2685–2688
134	Case Appeal Statement	02/23/21	11	2711–2716
163	Case Appeal Statement	06/14/22	17	4196–4201
95	Claim of Exemption from Execution – A Cab Series, LLC, Administration Company	10/04/18	8	1993–1998
94	Claim of Exemption from Execution – A Cab Series, LLC, CCards Company	10/04/18	8	1987–1992
97	Claim of Exemption from Execution – A Cab Series, LLC, Employee Leasing Company Two	10/04/18	9	2005–2010
93	Claim of Exemption from Execution – A Cab Series, LLC, Maintenance Company	10/04/18	8	1981–1986
98	Claim of Exemption from Execution – A Cab Series, LLC, Medallion Company	10/04/18	9	2011–2016
96	Claim of Exemption from Execution – A Cab Series, LLC, Taxi Leasing Company	10/04/18	8 9	1999–2000 2001–2004
79	Clerk’s Certificate Judgment	05/07/18	6	1381–1386
131	Clerk’s Certificate Judgment	12/15/20	11	2694–2702
1	Complaint	10/08/12	1	1–8
5	Defendant A Cab, LLC’s Answer to Complaint	04/22/13	1	48–52
7	Defendant A Cab, LLC’s Answer to First Amended Complaint	05/23/13	1	57–61

17	Defendant A Cab, LLC's Answer to Second Amended Complaint	09/14/15	1	163–169
18	Defendant Creighton J. Nady's Answer to Second Amended Complaint	10/06/15	1	170–176
89	Defendant's Ex-Parte Motion to Quash Writ of Execution and, in the Alternative, Motion for Partial Stay of Execution on Order Shortening	09/21/18	7 8	1745–1750 1751–1769
120	Defendant's Second Amended Case Appeal Statement	03/06/19	11	2554–2558
114	Defendants' Amended Case Appeal Statement	01/15/19	11	2514–2518
51	Defendants' Case Appeal Statement	03/20/17	4	858–862
88	Defendants' Case Appeal Statement	09/21/18	7	1740–1744
135	Defendants' Motion for Costs	01/13/22	11 12	2717–2750 2751–2810
185	Defendants' Motion for Costs	10/24/22	22	5310–5326
140	Defendants' Motion for Declaratory Order	02/11/22	12 13	2854–3000 3001–3064
148	Defendants' Motion to Stay on Order Shortening Time	02/28/22	14 15	3385–3500 3501–3512
182	Defendants' Omnibus Brief Pursuant to Court Order	09/30/22	20 21	4990–5000 5001–5199
139	Defendants' Supplement to Response and Opposition to Plaintiffs' Rogue Supplement	02/10/22	12	2851–2853
146	Errata to Plaintiffs' Motion for Entry of Modified Award of Pre-Judgment Attorney's Fees as Provided for by Remittitur	02/23/22	14	3333–3336
183	Exhibits 6-14 to Defendants' Omnibus Brief Pursuant to Court Order	09/30/22	21 22	5200–5250 5251–5300

3	First Amended Complaint	01/30/13	1	32–38
8	Joint Case Conference Report	05/28/13	1	62–69
21	Joint Case Conference Report	11/25/15	2	378–386
84	Motion to Amend Judgment	08/22/18	7	1647–1655
50	Notice of Appeal	03/20/17	4	856–857
87	Notice of Appeal	09/21/18	7	1738–1739
128	Notice of Appeal	08/12/20	11	2683–2684
133	Notice of Appeal	02/23/21	11	2709–2710
162	Notice of Appeal	06/14/22	17	4194–4195
202	Notice of Appeal	12/14/22	22 23	5430–5500 5501–5511
4	Notice of Entry of Decision and Order	02/13/13	1	39–47
56	Notice of Entry of Decision and Order	06/07/17	5	1033–1050
53	Notice of Entry of Discovery Commissioner’s Report & Recommendations	05/18/17	4	872–880
65	Notice of Entry of Discovery Commissioner’s Report & Recommendations	10/24/17	5	1124–1131
36	Notice of Entry of Discovery Commissioner’s Report and Recommendations	07/13/16	3	547–553
6	Notice of Entry of Order	05/06/13	1	53–56
66	Notice of Entry of Order	12/12/17	5	1132–1135
67	Notice of Entry of Order	12/12/17	5	1136–1139
72	Notice of Entry of Order	01/22/18	6	1270–1275
100	Notice of Entry of Order	10/22/18	9	2042–2045
194	Notice of Entry of Order Continuing Decision on Plaintiffs’ Motion for an Award of Attorney’s Fees on Appeal of	11/17/22	22	5383–5386

	Order Denying Receiver, Opposing Mooted Motion for Attorney's Fees, and for Costs of Appeal			
25	Notice of Entry of Order Denying Defendant's Motion to Dismiss and for Summary Judgment Against Michael Murray	02/18/16	2	431–434
26	Notice of Entry of Order Denying Defendant's Motion to Dismiss and for Summary Judgment Against Michael Reno	02/18/16	2	435–438
196	Notice of Entry of Order Denying Defendants' Motion for Costs	11/17/22	22	5392–5395
34	Notice of Entry of Order Denying Defendants' Motion for Reconsideration of Two Orders Entered March 4, 2016, Pertaining to Discovery Commissioner's Reports & Recommendations	05/27/16	3	525–528
125	Notice of Entry of Order Denying Defendants' Motion for Reconsideration of Judgment and Order Granting Resolution Economics Application for Order of Payment of Special Master's Fees and Order of Contempt	08/08/19	11	2618–2623
110	Notice of Entry of Order Denying Defendants' Motion to Quash Writ of Execution	12/18/18	10	2476–2498
195	Notice of Entry of Order Denying Defendants' Motions for Sanctions	11/17/22	22	5387–5391
117	Notice of Entry of Order Denying in Part and Continuing in Part Plaintiffs' Motion on OST to Lift Stay, Hold Defendants in Contempt, Strike Their Answer, Grant	03/05/19	11	2540–2543

	Partial Summary Judgment, Direct A Prove Up Hearing, and Coordinate Cases			
201	Notice of Entry of Order Denying Plaintiffs Motion to Reconsider Award of Costs and Striking June 3, 2022 Order	11/23/22	22	5422–5429
9	Notice of Entry of Order Denying Plaintiffs’ Counter-Motion for Default Judgment or Sanctions Pursuant to EDCR 7.602(b)	05/29/13	1	70–73
62	Notice of Entry of Order Denying Plaintiffs’ Counter-Motion for Sanctions and Attorneys’ Fees and Order Denying Plaintiffs’ Anti-SLAPP Motion	07/31/17	5	1089–1092
75	Notice of Entry of Order Denying Plaintiffs’ Motion for Bifurcation and/or to Limit Issues for Trial per NRCP 42(B)	02/02/18	6	1333–1337
59	Notice of Entry of Order Denying Plaintiffs’ Motion for Partial Summary Judgment	07/17/17	5	1079–1084
169	Notice of Entry of Order Denying Plaintiffs’ Motion for Turnover of Property Pursuant to NRS 21.230 or Alternative Relief Without Prejudice	07/08/22	19	4671–4676
127	Notice of Entry of 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	07/17/20	11	2676–2682

30	Notice of Entry of Order Denying Plaintiffs' Motion to Impose Sanctions Against Defendants	04/07/16	2	477–480
45	Notice of Entry of Order Granting Certain Relief on Motion to Enjoin Defendants from Seeking Settlement of Any Unpaid Wage Claims Involving Any Class Members Except as Part of this Lawsuit and for Other Relief	02/16/17	4	827–830
157	Notice of Entry of Order Granting Defendants' Motion for Costs	05/17/22	16	3922–3927
160	Notice of Entry of Order Granting Defendants' Motion for Costs	06/03/22	17	4090–4093
158	Notice of Entry of Order Granting Defendants' Motion for Release of Cost Bonds	05/20/22	16	3928–3933
31	Notice of Entry of Order Granting Defendants' Motion for Stay Pending Court's Reconsideration of Prior Order	04/07/16	2	481–484
156	Notice of Entry of Order Granting Defendants' Motion to Stay	05/03/22	16	3917–3921
22	Notice of Entry of Order Granting in Part and Denying in Part Defendant's Motion for Declaratory Order Regarding Statute of Limitations	12/22/15	2	387–391
40	Notice of Entry of Order Granting in Part and Denying in Part Plaintiffs' Motion to Continue Trial Date and Extend Discovery Schedule and for Other Relief	11/23/16	3	672–677
46	Notice of Entry of Order Granting in Part and Denying in Part Plaintiffs' Motion to Have Case Reassigned to Department I per EDCR Rule 1.60 and	02/21/17	4	831–834

	Designated as Complex Litigation per NRCP 16.1(f)			
111	Notice of Entry of Order Granting in Part and Denying in Part Plaintiffs' Objections to Defendants' Claims of Exemption from Execution	12/18/18	10 11	2499–2500 2501–2502
15	Notice of Entry of Order Granting Motion to Serve and File a Second Amended and Supplemental Complaint	08/17/15	1	141–144
189	Notice of Entry of Order Granting Plaintiff's Motion for Entry of a Modified Judgment as Provided for by Remittitur	11/14/22	22	5338–5344
190	Notice of Entry of Order Granting Plaintiff's Motion for Entry of a Modified Award of Pre-Judgment Attorney's Fees as Provided for by Remittitur	11/14/22	22	5345–5350
112	Notice of Entry of Order Granting Plaintiffs' Counter Motion for Judgment Enforcement Relief	01/02/19	11	2503–2510
116	Notice of Entry of Order Granting Plaintiffs' Motion for an Award of Attorneys' Fees and Costs Pursuant to NRCP 54 and the Nevada Constitution	02/07/19	11	2529–2539
193	Notice of Entry of Order Granting Plaintiffs' Motion for Award of Attorney's Fees on Appeal	11/17/22	22	5377–5382
76	Notice of Entry of Order Granting Plaintiffs' Motion to Appoint a Special Master	02/08/18	6	1338–1345
24	Notice of Entry of Order Granting Plaintiffs' Motion to Certify Class Action Pursuant to NRCP Rule 23 (b)(2) and NRCP Rule 23(b)(3) and Denying Without Prejudice Plaintiffs' Motion to	02/10/16	2	413–430

	Appoint a Special Master Under NRCP Rule 53			
35	Notice of Entry of Order Granting Plaintiffs' Motion to Certify Class Action Pursuant to NRCP Rule 23(b)(2) and NRCP Rule 23(b)(3) and Denying Without Prejudice Plaintiffs' Motion to Appoint a Special Master Under NRCP Rule 53 and Amended by this Court in Response to Defendant's Motion for Reconsideration Heard in Chambers on March 28,2016	06/07/16	3	529–546
83	Notice of Entry of Order Granting Summary Judgment, Severing Claims, and Directing Entry of Final Judgment	08/22/18	7	1581–1646
78	Notice of Entry of Order Modifying Court's Previous Order of February 7, 2018 Appointing a Special Master	02/16/18	6	1377–1380
192	Notice of Entry of Order Modifying Final Judgment Entered on August 21, 2018	11/17/22	22	5356–5376
199	Notice of Entry of Order Modifying Order on February 6, 2019 Granting Plaintiffs an Award of Attorney's Fees and Costs	11/18/22	22	5404–5409
70	Notice of Entry of Order of Appointment of Co-Class Counsel Christian Gabroy	01/04/18	6	1262–1265
27	Notice of Entry of Order of Discovery Commissioner's Report and Recommendation	03/04/16	2	439–446
28	Notice of Entry of Order of Discovery Commissioner's Report and Recommendation	03/04/16	2	447–460
52	Notice of Entry of Order of Discovery Commissioner's Report and Recommendations	03/31/17	4	863–871

48	Notice of Entry of Order of Discovery Commissioners Report and Recommendations	03/13/17	4	839–847
49	Notice of Entry of Order of Discovery Commissioners Report and Recommendations	03/13/17	4	848–855
47	Notice of Entry of Order of Stipulation and Order	03/09/17	4	835–838
33	Notice of Entry of Order on Defendants’ Motion for Reconsideration	04/28/16	3	521–524
118	Notice of Entry of Order on Defendants’ Motion for Reconsideration	03/05/19	11	2544–2549
115	Notice of Entry of Order on Judgment and Order Granting Resolution Economics’ Application for Order of Payment of Special Master’s Fees and Order of Contempt	02/05/19	11	2519–2528
197	Notice of Entry of Order on Motion for Costs	11/17/22	22	5396–5398
200	Notice of Entry of Order on Motion to Distribute Funds Held by Class Counsel on and Order Shortening Time	11/21/22	22	5410–5421
132	Notice of Entry of Order on Plaintiff’s Motion for Appointment of Receiver to Aid Judgment Enforcement of Alternative Relief	02/22/21	11	2703–2708
121	Notice of Entry of Order on Special Master Resolution Economics’ Ex Parte Motion for Order Shortening Time on the Motion to Strike Defendants’ Motion for Reconsideration of Judgment and Order Granting Resolution Economics Application for Order of Payment of	03/15/19	11	2559–2563

	Special Masters Fees and Oder of Contempt			
71	Notice of Entry of Order Stipulation and Order	01/16/18	6	1266–1269
10	Notice of Entry of Stipulation and Order Staying All Proceedings for a Period of Ninety (90) days	01/29/14	1	74–78
11	Notice of Entry of Stipulation and Order Staying All Proceedings for a Period of Ninety (90) days (Second Request)	04/23/14	1	79–83
12	Notice of Entry of Stipulation and Order Staying All Proceedings for a Period of Sixty (60) days (Third Request)	07/28/14	1	84–87
186	Notice of Non-Opposition to Defendants’ Motion for Costs	11/01/22	22	5327–5329
204	Notice of Removal	12/14/22	23	5517–5526
151	Opposition to Plaintiffs’ Motion for an Award of Attorney’s Fees on Appeal	03/03/22	16	3797–3817
153	Opposition to Plaintiffs’ Motion for an Award of Attorney’s Fees on Appeal of Order Denying Receiver, Opposing Mooted Motion for Attorney’s Fees, and for Costs on Appeal	03/08/22	16	3860–3886
103	Opposition to Plaintiffs’ Motion for an Award of Attorneys Fees and Costs Per NRCP Rule 54 and the Nevada Constitution	11/01/18	9 10	2156–2250 2251–2294
149	Opposition to Plaintiffs’ Motion for Entry of a Modified Judgment as Provided for by Remittitur	02/28/22	15 16	3513–3750 3751–3786
150	Opposition to Plaintiffs’ Motion for Entry of Modified Award of Pre-Judgment	03/02/22	16	3787–3796

	Attorney's Fees and as Provided for by Remittitur			
85	Opposition to Plaintiffs' Motion to Amend Judgment	09/10/18	7	1656–1680
105	Opposition to Plaintiffs' Motion to File a Supplement in Support of an Award of Attorneys Fees and Costs Per NRCP Rule 54 and the Nevada Constitution	11/16/18	10	2304–2316
166	Opposition to Plaintiffs' Motion to Reconsider Award of Costs and Countermotion to Strike Duplicative Order	06/30/22	18	4380–4487
161	Opposition to Plaintiffs' Motion to Stay, Offset, or Apportion Award of Costs and/or Reconsider Award of Costs and Countermotion for Attorney's Fees	06/14/22	17	4094–4193
60	Order	07/17/17	5	1085–1086
61	Order	07/17/17	5	1087–1088
191	Order Amending the Class	11/17/22	22	5351–5355
168	Order Denying Motion Without Prejudice and with Leave to Renew	07/08/22	19	4667–4670
181	Order Granting Motion to Lift Stay and Regarding Additional Briefing and Motion Practice	09/19/22	20	4984–4989
198	Order Granting Motion to Stay, Offset, or Apportion Award of Cost	11/17/22	22	5399–5403
144	Plaintiffs' Motion for an Award of Attorney's Fees on Appeal	02/17/22	14	3302–3316
145	Plaintiffs' Motion for an Award of Attorney's Fees on Appeal of Order Denying Receiver, Opposing Mooted Motion for Attorney's Fees, and for Costs on Appeal	02/22/22	14	3317–3332

99	Plaintiffs' Motion for an Award of Attorneys Fees and Costs as per NRCP Rule 54 and the Nevada Constitution	10/12/18	9	2017–2041
141	Plaintiffs' Motion for Entry of a Modified Judgment as Provided for by Remittitur	02/14/22	13	3065–3221
142	Plaintiffs' Motion for Entry of Modified Award of Pre-Judgment Attorney's Fees as Provided for by Remittitur	02/16/22	13 14	3222–3250 3251–3272
102	Plaintiffs' Motion to File a Supplement in Support of an Award of Attorneys Fees and Costs Per NRCP Rule 54 and the Nevada Constitution	10/29/18	9	2143–2155
176	Plaintiffs' Motion to Lift Stay and Have Pending Motions Decided	08/12/22	20	4868–4882
164	Plaintiffs' Motion to Reconsider Award of Costs	06/16/22	17 18	4202–4250 4251–4356
159	Plaintiffs' Motion to Stay, Offset, or Apportion Award of Costs and/or Reconsider Award of Costs	05/31/22	16 17	3934–4000 4001–4089
184	Plaintiffs' Omnibus Brief Pursuant to the Court's Order of September 19, 2022	09/30/22	22	5301–5309
187	Plaintiffs' Opposition to Defendants' Motion for Costs	11/04/22	22	5330–5333
180	Plaintiffs' Reply to Defendant's Opposition to Plaintiffs' Motion to Lift Stay and Have Pending Motions Decided	09/13/22	20	4967–4983
86	Plaintiffs' Reply to Defendants' Opposition to Plaintiffs' Motion to Amend Judgment	09/20/18	7	1681–1737
104	Plaintiffs' Reply to Defendants' Opposition to Plaintiffs' Motion for an Award of Attorneys Fees and Costs as	11/08/18	10	2295–2303

	Per NRCP Rule 54 and the Nevada Constitution			
106	Plaintiffs' Reply to Defendants' Opposition to Plaintiffs' Motion to File a Supplement in Support of an Award of Attorneys Fees and Costs Per NRCP Rule 54 and the Nevada Constitution	11/28/18	10	2317–2323
167	Plaintiffs' Reply to Defendants' Opposition to Plaintiffs' Motion to Stay, Offset, or Apportion Award of Costs and/or Reconsider Award of Costs	07/01/22	18 19	4488–4500 4501–4666
170	Plaintiffs' Reply to Defendants' Opposition to Plaintiffs' Motion to Reconsider Award of Costs and Response to Defendants' Counter-Motion	07/21/22	19	4677–4716
172	Plaintiffs' Reply to Defendants' Opposition to Plaintiffs' Motion for Entry of Modified Judgment as Provided for by Remittitur	08/12/22	20	4767–4835
173	Plaintiffs' Reply to Defendants' Opposition to Plaintiffs' Motion for Entry of Modified Award of Pre-Judgment Attorney's Fees and Provided for by Remittitur	08/12/22	20	4836–4840
174	Plaintiffs' Reply to Defendants' Opposition to Plaintiffs' Motion for an Award of Attorney's Fees on Appeal	08/12/22	20	4841–4845
175	Plaintiffs' Reply to Defendants' Opposition to Plaintiffs' Motion for an Award of Attorneys' Fees on Appeal of Order Denying Receiver, Opposing Mooted Motion for Attorney's Fees, and for Costs on Appeal	08/12/22	20	4846–4867

90	Plaintiffs' Response and Counter-motion to Defendants Motion on OST to Quash	09/24/18	8	1770–1845
136	Plaintiffs' Response to Defendants' Motion for Costs & Counter Motion to Offset Costs Against Judgment	02/03/22	12	2811–2825
147	Plaintiffs' Response to Defendants' Motion for Declaratory Order & Counter-Motion for Award of Attorney's Fees	02/25/22	14	3337–3384
152	Plaintiffs' Response to Defendants' Motion for Stay on Order Shortening Time and Counter-Motion for Award of Attorney's Fees	03/04/22	16	3818–3859
107	Recorder's Transcript of Hearing on All Pending Motions	12/04/18	10	2324–2405
205	Recorder's Transcript of Hearing on Argument re Post Judgment Receiver Motion to Distribute Funds Held by Class Counsel on an Order Shortening Time	12/15/22	23	5527–5530
124	Recorder's Transcript of Hearing re All Pending Motions	05/21/19	11	2570–2617
126	Recorder's Transcript of Hearing re All Pending Motions	12/03/19	11	2624–2675
143	Recorder's Transcript of Hearing re All Pending Motions	02/16/22	14	3273–3301
155	Recorder's Transcript of Hearing re Defendant's Motion to Stay on OST	03/09/22	16	3902–3916
63	Recorder's Transcript of Proceeding re Discovery Conference	08/08/17	5	1093–1110
64	Recorder's Transcript of Proceeding re Discovery Conference – Referred by Judge	10/04/17	5	1111–1123

20	Recorder's Transcript of Proceedings for All Pending Motions	11/18/15	2	346–377
23	Recorder's Transcript of Proceedings for Discovery Production/Deferred Ruling – Defendant's Rule 37 Sanctions	01/13/16	2	392–412
32	Recorder's Transcript of Proceedings for Further Proceedings on Discovery Production/Deferred Ruling	04/08/16	2 3	485–500 501–520
13	Recorder's Transcript of Proceedings Notice of Plaintiffs' Motion to Compel the Production of Documents	03/18/15	1	88–107
42	Recorder's Transcript of Proceedings re Plaintiffs' Motion to Compel the Production of Documents	01/25/17	3 4	742–750 751–787
43	Recorder's Transcript of Proceedings re Plaintiffs' Motion to Compel Compliance with Subpoena	02/08/17	4	788–806
39	Recorder's Transcript of Proceedings re Status Check Compliance	11/18/16	3	647–671
188	Reply in Support of Defendants' Motion for Costs	11/07/22	22	5334–5337
137	Reply in Support of Defendants' Motion for Costs and Opposition to Countermotion	02/09/22	12	2826–2846
154	Reply in Support of Defendants' Motion to Stay on Order Shortening Time	03/08/22	16	3887–3901
177	Response to Plaintiffs' Motion to Lift Stay and Have Pending Motions Decided	08/26/22	20	4883–4936
16	Second Amended Complaint and Supplemental Complaint	08/19/15	1	145–162
119	Second Amended Notice of Appeal	03/06/19	11	2550–2553

179	Second Supplement to Defendants' Response to Plaintiffs' Motion to Lift Stay and Have Pending Motions Decided	09/09/22	20	4962–4966
58	Stipulation and Order	07/11/17	5	1073–1078
122	Stipulation and Order to Continue Hearings	05/17/19	11	2564–2566
123	Stipulation and Order to Continue Hearings	05/20/19	11	2567–2569
178	Supplement to Defendants' Response to Plaintiffs' Motion to Lift Stay and Have Pending Motions Decided	08/29/22	20	4937–4961
138	Supplement to Plaintiffs' Response to Defendants' Motion for Costs	02/10/22	12	2847–2850
19	Transcript of Proceedings of All Pending Motions	11/03/15	1 2	177–250 251–345
171	Transcript of Proceedings re Case Management Conference	07/25/22	19 20	4717–4750 4751–4766
41	Transcript of Proceedings re Motion to Compel Interrogatory Responses on Status Check Compliance - Report and Recommendation	12/09/16	3	678–741
38	Transcript of Proceedings re Motions Status Check, Compliance Status Check, and Production Status Check	10/12/16	3	597–646
37	Transcript of Proceedings re Plaintiff's Motion to Compel the Production of Documents and Interrogatory Responses - Status Check on Status of Case	09/07/16	3	554–596
165	Transcript of Proceedings re Plaintiffs' Motion for Turnover of Property Pursuant to NRS 21.320 or Alternative Relief	06/29/22	18	4357–4379

54	Transcript re All Pending Motions	05/18/17	4 5	881–1000 1001–1011
101	Transcript Re All Pending Motions	10/22/18	9	2046–2142
77	Transcript re Appointment of Special Master	02/15/18	6	1346–1376
91	Transcript re Defendant’s Ex-Parte Motion to Quash Writ of Execution and, in the Alternative, Motion for Partial Stay of Execution on Order Shortening	09/26/18	8	1846–1913
92	Transcript re Defendant’s Ex-Parte Motion to Quash Writ of Execution and, in the Alternative, Motion for Partial Stay of Execution on Order Shortening, and Plaintiffs’ Response to Defendant’s Ex-Parte Motion to Quash Writ of Execution on OST and Countermotion for Appropriate Judgment Enforcement Relief	09/28/18	8	1914–1980
69	Transcript re Defendant’s Motion for Summary Judgment	01/02/18	5 6	1199–1250 1251–1261
2	Transcript re Defendant’s Motion to Dismiss Complaint	01/17/13	1	9–31
82	Transcript re Plaintiff’s Motion for Partial Summary Judgment	06/05/18	7	1509–1580
57	Transcript re Plaintiff’s Motion on Order Shortening Time and Extend Damages Class Certification and for Other Relief	06/13/17	5	1051–1072
55	Transcript re Plaintiff’s Re-Notice of Motion for Partial Summary Judgment	05/25/17	5	1012–1032
109	Transcript re Plaintiffs Ex Parte Motion for a Temporary Restraining Order and Motion on an Order Requiring the Turnover of Certain Property of the	12/13/18	10	2424–2475

	Judgment Debtor Pursuant to NRS 21.320			
80	Transcript re Plaintiffs' Motion for Miscellaneous Relief	05/23/18	6	1387–1463
44	Transcript re Plaintiffs' Motion on OST to Expedite Issuance of Order Granting Motion Filed on 10/14/16 to Enjoin Defendants from Seeking Settlement of any Unpaid Wage Claims Involving any Class Members Except as Part of this Lawsuit and for Other Relief and for Sanctions	02/14/17	4	807–826
14	Transcript re Plaintiffs' Motion to Certify This Case as a Class Action Pursuant to NCRP Rule 23 and Appoint a Special Master Pursuant to NRCP Rule 53	08/11/15	1	108–140
81	Transcript re Plaintiffs' Motion to Hold Defendants in Contempt; Strike Their Answer	06/01/18	6 7	1464–1500 1501–1508
73	Transcript re Plaintiffs' Omnibus Motion in Limine 1-25, Defendants' Motion in Limine to Exclude the Testimony of Plaintiffs' Experts	01/25/18	6	1276–1311
108	Transcript Re Resolution Economics' Application for Order of Payment of Special Master's Fees and Motion for Contempt	12/11/18	10	2406–2423
74	Transcript re Status Check on Appointment of Special Master	02/02/18	6	1312–1332
68	Transcript Re: Plaintiff's Motion for Partial Summary Judgment and Motion to Place Evidentiary Burden on Defendants to Establish Lower Tier	12/14/17	5	1140–1198

	Minimum Wage and Declare NAC 608.102(2)(b) Invalid			
29	Transcript Re: Plaintiffs' Motion to Impose Sanctions Against Defendants for Violating this Court's Order of February 10, 2016 and Compelling Compliance with that Order on OST; and Defendant's Opposition to Motion to Impose Sanctions on Order Shortening Time and Countermotion for Sanctions Against Plaintiffs	03/16/16	2	461–476

CERTIFICATE OF SERVICE

I certify that on the 26th day of January, 2024, I submitted the foregoing “Appellant’s Appendix” for e- filing and service via the Court’s eFlex electronic filing system. Electronic service of the forgoing documents shall be made upon all parties listed on the Master Service List.

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Attorneys for Respondents

/s/ Jessie M. Helm
An Employee of Lewis Roca Rothgerber Christie LLP

Check Number	Payroll Check Date	Payroll Records Employee Account Number	Last Name	First Name	Date Became Qualified for Health Insurance	Pay Period Start Date	Pay Period End Date	Hours for Pay Period From Payroll Records	Total Wages Paid	Minimum Wages Owed at \$7.25 an Hour for all Hours
21680	10/2/2015	100619	Walls	Charles	7/1/2015	9/12/2015	9/25/2015	72.88	\$697.95	\$0.00
21681	10/2/2015	113891	Washington	Kenneth	5/1/2015	9/12/2015	9/25/2015	82.95	\$601.32	\$0.07
21682	10/2/2015	109248	Waymark	Thomas	5/1/2015	9/12/2015	9/25/2015	97.37	\$757.36	\$0.00
21683	10/2/2015	3496	Weaver	Gerie	4/1/2011	9/12/2015	9/25/2015	69.57	\$583.14	\$0.00
21684	10/2/2015	2785	Welborn	Paul	5/1/2012	9/12/2015	9/25/2015	55.82	\$659.47	\$0.00
21685	10/2/2015	113682	Wible	Gregory	8/1/2015	9/12/2015	9/25/2015	58.05	\$420.98	\$0.00
21686	10/2/2015	113240	Woldemichael	Meles	11/1/2015	9/12/2015	9/25/2015	117.57	\$1,589.71	\$0.00
21687	10/2/2015	110866	Wolfe	Thomas	8/1/2013	9/12/2015	9/25/2015	75.49	\$781.78	\$0.00
21688	10/2/2015	3910	Wong	Jorge	1/1/2013	9/12/2015	9/25/2015	71.92	\$753.38	\$0.00
21690	10/2/2015	3092	Yabut	Gerry	6/1/2009	9/12/2015	9/25/2015	116.04	\$1,395.88	\$0.00
21691	10/2/2015	108389	Yamaguchi	Alicia	12/1/2012	9/12/2015	9/25/2015	110.69	\$979.90	\$0.00
21692	10/2/2015	114275	Yerima	Mollah	7/1/2015	9/12/2015	9/25/2015	109.78	\$1,150.12	\$0.00
21693	10/2/2015	113075	Yu	Mary	9/1/2015	9/12/2015	9/25/2015	112.93	\$1,022.30	\$0.00
21694	10/2/2015	30374	Zafar	John	6/1/2010	9/12/2015	9/25/2015	102.77	\$1,397.37	\$0.00
21695	10/2/2015	114189	Zaldivar	Maikel	11/1/2015	9/12/2015	9/25/2015	84.10	\$782.37	\$0.00
21696	10/2/2015	2273	Zawoudie	Masfen	7/1/2008	9/12/2015	9/25/2015	102.18	\$1,164.17	\$0.00
21697	10/2/2015	111519	Zghaier	Hassan	11/1/2015	9/12/2015	9/25/2015	104.84	\$1,223.30	\$0.00
21774	10/16/2015	112948	Abdalla	Mustafa	5/1/2015	9/26/2015	10/9/2015	85.11	\$1,073.55	\$0.00
21775	10/16/2015	2640	Abuel	Alan	7/1/2008	9/26/2015	10/9/2015	99.42	\$1,334.60	\$0.00
21776	10/16/2015	100221	Ackman	Charles	4/1/2013	9/26/2015	10/9/2015	124.78	\$1,324.39	\$0.00
21778	10/16/2015	24802	Altamirano	Keith	10/1/2014	9/26/2015	10/9/2015	102.41	\$1,325.08	\$0.00
21779	10/16/2015	103822	Alvarado	Santiago	9/1/2014	9/26/2015	10/9/2015	107.15	\$1,071.36	\$0.00
21780	10/16/2015	29709	Andersen	Jason	5/1/2009	9/26/2015	10/9/2015	79.61	\$650.90	\$0.00
21781	10/16/2015	106828	Anderson	Calvin	2/1/2013	9/26/2015	10/9/2015	93.68	\$1,034.41	\$0.00
21782	10/16/2015	114697	Anderson	Neal	10/1/2015	9/26/2015	10/9/2015	123.82	\$1,309.46	\$0.00
21783	10/16/2015	3650	Anif	Janeid	3/1/2012	9/26/2015	10/9/2015	77.24	\$1,106.42	\$0.00
21784	10/16/2015	114669	Anon	Nelson	10/1/2015	9/26/2015	10/9/2015	98.14	\$797.14	\$0.00
21785	10/16/2015	106151	Apodaca	Orlando	7/1/2015	9/26/2015	10/9/2015	120.85	\$968.36	\$0.00
21786	10/16/2015	3730	Arar	Isam	10/1/2011	9/26/2015	10/9/2015	27.19	\$302.43	\$0.00
21787	10/16/2015	25901	Armendinger	Shane	7/1/2008	9/26/2015	10/9/2015	103.39	\$1,109.45	\$0.00
21788	10/16/2015	26553	Arnwine	Howard	4/1/2012	9/26/2015	10/9/2015	78.63	\$798.14	\$0.00
21789	10/16/2015	113714	Arrandt	Robert	12/1/2015	9/26/2015	10/9/2015	100.65	\$729.76	\$0.00
21790	10/16/2015	113763	Arroyo	Carlos	10/1/2015	9/26/2015	10/9/2015	101.57	\$981.74	\$0.00
21791	10/16/2015	114195	Arzola	Juan	6/1/2015	9/26/2015	10/9/2015	140.34	\$2,207.61	\$0.00
21792	10/16/2015	103560	Awad	Edward	10/1/2015	9/26/2015	10/9/2015	102.20	\$1,005.08	\$0.00
21793	10/16/2015	112015	Bambenek	Matthew	3/1/2014	9/26/2015	10/9/2015	87.02	\$1,101.19	\$0.00
21794	10/16/2015	112978	Bancod	Michael	3/1/2015	9/26/2015	10/9/2015	69.05	\$598.31	\$0.00
21795	10/16/2015	16654	Barnhart	John	7/1/2015	9/26/2015	10/9/2015	111.54	\$1,158.37	\$0.00
21796	10/16/2015	113542	Basoalto-San	Lucia	9/1/2015	9/26/2015	10/9/2015	100.35	\$1,111.31	\$0.00
21797	10/16/2015	2454	Batista	Eugenio	7/1/2008	9/26/2015	10/9/2015	80.98	\$949.18	\$0.00
21798	10/16/2015	100286	Bedane	Belay	3/1/2015	9/26/2015	10/9/2015	91.69	\$822.42	\$0.00
21799	10/16/2015	110687	Berger	James	5/1/2014	9/26/2015	10/9/2015	88.87	\$968.42	\$0.00
21800	10/16/2015	112830	Bestard-Sand	Vladimir	12/1/2015	9/26/2015	10/9/2015	83.47	\$605.40	\$0.00
21801	10/16/2015	23373	Bey	Ronald	4/1/2009	9/26/2015	10/9/2015	70.81	\$859.13	\$0.00
21732	10/16/2015	106621	Booth	Deborah	10/1/2015	9/26/2015	10/9/2015	38.02	\$275.58	\$0.07
21802	10/16/2015	3581	Borges	Antonio	9/1/2011	9/26/2015	10/9/2015	67.20	\$831.25	\$0.00
21803	10/16/2015	101034	Bower	Terry	3/1/2015	9/26/2015	10/9/2015	97.90	\$1,237.02	\$0.00
21805	10/16/2015	3949	Brown	Daniel	4/1/2013	9/26/2015	10/9/2015	16.93	\$1,056.21	\$0.00
21806	10/16/2015	107492	Brown	Jimmy	9/1/2014	9/26/2015	10/9/2015	93.73	\$876.96	\$0.00
21807	10/16/2015	106463	Capone	Gary	2/1/2014	9/26/2015	10/9/2015	51.70	\$574.33	\$0.00
21808	10/16/2015	2660	Carracedo	Sonny	7/1/2008	9/26/2015	10/9/2015	85.14	\$883.94	\$0.00
21809	10/16/2015	3899	Casiello	Anthony	12/1/2012	9/26/2015	10/9/2015	74.46	\$640.70	\$0.00
21810	10/16/2015	102334	Castellanos	Joaquin	8/1/2014	9/26/2015	10/9/2015	92.61	\$859.23	\$0.00
21811	10/16/2015	103777	Castro-Jaen	Lazaro	12/1/2015	9/26/2015	10/9/2015	96.67	\$1,019.56	\$0.00

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21812	10/16/2015	21398	Chenpanas	Surapan	11/1/2015	9/26/2015	10/9/2015	95.61	\$882.29	\$0.00
21813	10/16/2015	29301	Cicerchi	Michael	12/1/2015	9/26/2015	10/9/2015	133.52	\$1,437.20	\$0.00
21814	10/16/2015	106890	Co	Pedro	11/1/2015	9/26/2015	10/9/2015	119.88	\$964.94	\$0.00
21815	10/16/2015	2051	Costello	Brad	7/1/2008	9/26/2015	10/9/2015	86.03	\$834.20	\$0.00
21816	10/16/2015	15756	Craddock	Mason	12/1/2015	9/26/2015	10/9/2015	64.28	\$489.85	\$0.00
21817	10/16/2015	109796	Curtin	Ronald	7/1/2013	9/26/2015	10/9/2015	79.18	\$689.47	\$0.00
21818	10/16/2015	112564	Cyiark	Billy	9/1/2015	9/26/2015	10/9/2015	127.83	\$1,150.50	\$0.00
21819	10/16/2015	109130	Dacayanan	Liza	9/1/2013	9/26/2015	10/9/2015	109.60	\$1,258.33	\$0.00
21820	10/16/2015	23948	Daffron	Daniel	6/1/2013	9/26/2015	10/9/2015	69.87	\$779.91	\$0.00
21749	10/16/2015	113062	Daghlawi	Rahim	9/1/2015	9/26/2015	10/9/2015	64.95	\$566.02	\$0.00
21821	10/16/2015	110936	Daniels	James	7/1/2013	9/26/2015	10/9/2015	105.42	\$1,286.04	\$0.00
21822	10/16/2015	111137	Dejacto	Giovanna	10/1/2013	9/26/2015	10/9/2015	128.87	\$1,438.39	\$0.00
21823	10/16/2015	112508	Demick Jr.	William	3/1/2015	9/26/2015	10/9/2015	106.88	\$931.51	\$0.00
21824	10/16/2015	3936	Dial	Donald	3/1/2013	9/26/2015	10/9/2015	77.24	\$772.25	\$0.00
21825	10/16/2015	111351	Diomande	Almamy	6/1/2015	9/26/2015	10/9/2015	89.94	\$811.98	\$0.00
21826	10/16/2015	3756	Disbrow	Ronald	1/1/2012	9/26/2015	10/9/2015	60.45	\$521.08	\$0.00
21827	10/16/2015	3395	Dixon	Julius	11/1/2010	9/26/2015	10/9/2015	126.47	\$1,659.94	\$0.00
21828	10/16/2015	2006	Durtschi	Jeffrey	7/1/2008	9/26/2015	10/9/2015	101.00	\$1,217.15	\$0.00
21829	10/16/2015	112745	Ebert	Michael	12/1/2015	9/26/2015	10/9/2015	115.66	\$974.81	\$0.00
21830	10/16/2015	2637	Edwards	Jeffrey	7/1/2008	9/26/2015	10/9/2015	120.64	\$1,350.54	\$0.00
21729	10/16/2015	3381	Egan	Joseph	10/1/2010	9/26/2015	10/9/2015	19.60	\$173.16	\$0.00
21831	10/16/2015	3595	Ekoue	Ayi	10/1/2011	9/26/2015	10/9/2015	96.08	\$1,027.57	\$0.00
21832	10/16/2015	109641	Emling	Paul	8/1/2012	9/26/2015	10/9/2015	31.78	\$421.77	\$0.00
21833	10/16/2015	108744	Esparza	Francisco	4/1/2015	9/26/2015	10/9/2015	104.74	\$819.33	\$0.00
21835	10/16/2015	112418	Faye	Pape	11/1/2015	9/26/2015	10/9/2015	117.57	\$1,247.05	\$0.00
21836	10/16/2015	104153	Feller	Anthony	12/1/2015	9/26/2015	10/9/2015	109.33	\$871.55	\$0.00
21837	10/16/2015	108011	Fernandez-Le	Alexander	6/1/2015	9/26/2015	10/9/2015	94.60	\$1,069.41	\$0.00
21838	10/16/2015	3549	Fesehazion	Teabe	7/1/2011	9/26/2015	10/9/2015	75.94	\$728.65	\$0.00
21839	10/16/2015	109381	Fitzsimmons	Marc	8/1/2014	9/26/2015	10/9/2015	96.14	\$753.83	\$0.00
21840	10/16/2015	30616	Flores	Abner	10/1/2014	9/26/2015	10/9/2015	112.89	\$1,051.60	\$0.00
21841	10/16/2015	114873	Flournoy	Carr	12/1/2015	9/26/2015	10/9/2015	126.21	\$1,033.40	\$0.00
21842	10/16/2015	25493	Fragoza	Michael	5/1/2015	9/26/2015	10/9/2015	69.69	\$734.00	\$0.00
21843	10/16/2015	24791	Garcia	Anthony	6/1/2013	9/26/2015	10/9/2015	79.37	\$942.47	\$0.00
21844	10/16/2015	2782	Garcia	John	7/1/2008	9/26/2015	10/9/2015	113.61	\$1,043.54	\$0.00
21845	10/16/2015	111531	Gay	Phillip	8/1/2015	9/26/2015	10/9/2015	50.66	\$476.12	\$0.00
21846	10/16/2015	113914	Gazzara	Anthony	4/1/2015	9/26/2015	10/9/2015	93.62	\$773.70	\$0.00
21847	10/16/2015	29297	Gebremichea	Yohannes	9/1/2014	9/26/2015	10/9/2015	59.90	\$580.70	\$0.00
21848	10/16/2015	3696	Gillett	David	5/1/2012	9/26/2015	10/9/2015	31.77	\$284.40	\$0.00
21849	10/16/2015	3121	Gleason	John	8/1/2009	9/26/2015	10/9/2015	20.62	\$242.30	\$0.00
21850	10/16/2015	114601	Godfrey	Brenda	10/1/2015	9/26/2015	10/9/2015	93.08	\$1,014.27	\$0.00
21851	10/16/2015	106897	Goettsche	Dale	6/1/2013	9/26/2015	10/9/2015	104.48	\$1,256.00	\$0.00
21852	10/16/2015	19253	Gray	Gary	4/1/2012	9/26/2015	10/9/2015	76.80	\$866.34	\$0.00
21777	10/16/2015	111916	Gray	Kenneth	12/1/2015	9/26/2015	10/9/2015	83.08	\$602.43	\$0.00
21853	10/16/2015	102800	Habte	Micheal	10/1/2015	9/26/2015	10/9/2015	82.68	\$995.75	\$0.00
21854	10/16/2015	21446	Handlon	Michael	6/1/2013	9/26/2015	10/9/2015	94.24	\$1,027.91	\$0.00
21855	10/16/2015	3402	Hansen	Jordan	11/1/2010	9/26/2015	10/9/2015	136.99	\$1,345.89	\$0.00
21856	10/16/2015	3855	Harris	Dennis	6/1/2012	9/26/2015	10/9/2015	95.27	\$983.31	\$0.00
21857	10/16/2015	19800	Hasbrouck Jr	Ronald	9/1/2015	9/26/2015	10/9/2015	107.91	\$1,120.88	\$0.00
21858	10/16/2015	112912	Hassanzadeh	Davoud	11/1/2014	9/26/2015	10/9/2015	72.77	\$875.43	\$0.00
21859	10/16/2015	102378	Hatch Jr.	Frank	4/1/2015	9/26/2015	10/9/2015	40.15	\$406.22	\$0.00
21860	10/16/2015	2097	Hinks	Dana	7/1/2008	9/26/2015	10/9/2015	88.81	\$911.52	\$0.00
21861	10/16/2015	32082	Hoffman	Gary	4/1/2009	10/3/2015	10/9/2015	88.89	\$661.07	\$0.00
21863	10/16/2015	2751	Hurtado	Hubert	7/1/2008	9/26/2015	10/9/2015	63.27	\$664.34	\$0.00
21864	10/16/2015	3187	Isaac	Edsel	10/1/2009	9/26/2015	10/9/2015	49.96	\$639.60	\$0.00

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21866	10/16/2015	3020	Jarmosco	John	3/1/2009	9/26/2015	10/9/2015	93.53	\$1,726.66	\$0.00
21867	10/16/2015	15638	Jawaid	Shaikh	11/1/2015	9/26/2015	10/9/2015	108.52	\$1,049.16	\$0.00
21868	10/16/2015	28842	Jimerson-Ces	Jo A	8/1/2015	9/26/2015	10/9/2015	84.41	\$892.45	\$0.00
21869	10/16/2015	29542	Kang	Chong	8/1/2009	9/26/2015	10/9/2015	74.02	\$885.92	\$0.00
21870	10/16/2015	106153	Keller	Roger	7/1/2013	9/26/2015	10/9/2015	87.06	\$778.18	\$0.00
21871	10/16/2015	2736	Kenary	Brian	7/1/2008	9/26/2015	10/9/2015	64.14	\$544.81	\$0.00
21872	10/16/2015	27999	Khan	Zia-Ur-Rehma	7/1/2015	9/26/2015	10/9/2015	23.55	\$170.75	\$0.00
21873	10/16/2015	107692	Kim	Chang	5/1/2015	9/26/2015	10/9/2015	108.82	\$1,570.62	\$0.00
21875	10/16/2015	3893	Klein	Phillip	11/1/2012	9/26/2015	10/9/2015	65.25	\$510.75	\$0.00
21876	10/16/2015	114375	Ko	Kuen	12/1/2015	9/26/2015	10/9/2015	11.01	\$152.86	\$0.00
21877	10/16/2015	3630	Kogan	Martin	1/1/2012	9/26/2015	10/9/2015	58.16	\$596.45	\$0.00
21878	10/16/2015	105627	Kronenberg	Arthur	4/1/2015	9/26/2015	10/9/2015	70.13	\$549.83	\$0.00
21879	10/16/2015	103826	Kull Jr.	William	6/1/2014	9/26/2015	10/9/2015	72.20	\$957.71	\$0.00
21880	10/16/2015	107625	Lafarge	Jeannine	7/1/2014	9/26/2015	10/9/2015	93.02	\$1,555.27	\$0.00
21881	10/16/2015	114766	Laughinghou	Charles	11/1/2015	9/26/2015	10/9/2015	115.92	\$983.78	\$0.00
21882	10/16/2015	111290	Lay	Gilbert	7/1/2014	9/26/2015	10/9/2015	109.05	\$1,199.00	\$0.00
21884	10/16/2015	3685	Leal	Jill	5/1/2012	9/26/2015	10/9/2015	48.07	\$602.61	\$0.00
21885	10/16/2015	108034	Leonardi	Kevin	11/1/2015	9/26/2015	10/9/2015	89.73	\$970.12	\$0.00
21887	10/16/2015	15804	Little	Dennis	12/1/2011	9/26/2015	10/9/2015	86.21	\$784.44	\$0.00
21888	10/16/2015	18903	Lozada	Giovanni	8/1/2015	10/3/2015	10/9/2015	83.97	\$1,087.77	\$0.00
21889	10/16/2015	3778	Macato	Jaime	1/1/2012	9/26/2015	10/9/2015	112.47	\$1,223.01	\$0.00
21890	10/16/2015	18640	Mahtani	Ratan	7/1/2015	9/26/2015	10/9/2015	76.43	\$664.56	\$0.00
21891	10/16/2015	2757	Majors	John	7/1/2008	9/26/2015	10/9/2015	73.36	\$762.38	\$0.00
21892	10/16/2015	31483	Malapira	Roberto	5/1/2015	9/26/2015	10/9/2015	66.48	\$631.44	\$0.00
21893	10/16/2015	3583	Maras	Maria	10/1/2011	9/26/2015	10/9/2015	104.60	\$1,348.74	\$0.00
21894	10/16/2015	110053	Martinez	Francisco	8/1/2013	9/26/2015	10/9/2015	60.03	\$676.01	\$0.00
21895	10/16/2015	110618	Mastrio	Pamela	5/1/2014	9/26/2015	10/9/2015	75.05	\$739.16	\$0.00
21896	10/16/2015	110395	Maxwell	Charles	11/1/2015	9/26/2015	10/9/2015	29.66	\$230.05	\$0.00
21897	10/16/2015	2587	McCarter	Patrick	7/1/2008	9/26/2015	10/9/2015	88.35	\$850.72	\$0.00
21898	10/16/2015	113696	McGinn	Randall	11/1/2015	9/26/2015	10/9/2015	45.42	\$459.00	\$0.00
21899	10/16/2015	25641	McSkimming	John	5/1/2014	9/26/2015	10/9/2015	71.92	\$601.68	\$0.00
21900	10/16/2015	29265	Micu	Emilio	9/1/2014	9/26/2015	10/9/2015	92.41	\$1,173.14	\$0.00
21901	10/16/2015	114922	Middleton	Shawn	12/1/2015	9/26/2015	10/9/2015	51.28	\$457.03	\$0.00
21902	10/16/2015	30196	Miller	Jason	11/1/2013	9/26/2015	10/9/2015	76.68	\$754.12	\$0.00
21903	10/16/2015	112009	Mock	Karen	10/1/2014	9/26/2015	10/9/2015	92.95	\$874.75	\$0.00
21904	10/16/2015	101935	Mohamed	Hamza	9/1/2014	9/26/2015	10/9/2015	116.84	\$1,782.06	\$0.00
21905	10/16/2015	105284	Monforte II	Peter	1/1/2012	9/26/2015	10/9/2015	125.12	\$1,005.75	\$0.00
21906	10/16/2015	3664	Moreno	James	3/1/2012	9/26/2015	10/9/2015	116.70	\$931.45	\$0.00
21907	10/16/2015	112561	Morgan	Sherryl	2/1/2015	9/26/2015	10/9/2015	63.96	\$622.34	\$0.00
21908	10/16/2015	8321	Morris	Thomas	1/1/2012	9/26/2015	10/9/2015	70.01	\$665.56	\$0.00
21909	10/16/2015	107704	Muhtari	Abdulrahman	2/1/2013	9/26/2015	10/9/2015	59.19	\$659.96	\$0.00
21910	10/16/2015	109569	Munoz-Ferna	Ariel	12/1/2015	9/26/2015	10/9/2015	69.53	\$559.90	\$0.00
21911	10/16/2015	3847	Murawski	Richard	6/1/2012	9/26/2015	10/9/2015	87.31	\$1,185.07	\$0.00
21912	10/16/2015	107440	Nantista	Peter	3/1/2013	9/26/2015	10/9/2015	46.68	\$390.64	\$0.00
21914	10/16/2015	27001	Olson	David	10/1/2015	9/26/2015	10/9/2015	89.23	\$759.54	\$0.00
21915	10/16/2015	3868	Olson	Eric	8/1/2012	9/26/2015	10/9/2015	114.99	\$1,318.64	\$0.00
21916	10/16/2015	107567	Ordaz	Guillermo	7/1/2015	9/26/2015	10/9/2015	86.18	\$680.27	\$0.00
21917	10/16/2015	3717	Ozgulgec	Tunc	10/1/2011	9/26/2015	10/9/2015	89.33	\$1,000.90	\$0.00
21918	10/16/2015	31283	Pak	Sam	7/1/2008	9/26/2015	10/9/2015	118.46	\$1,744.09	\$0.00
21752	10/16/2015	109637	Park	Danny	4/1/2014	9/26/2015	10/9/2015	65.52	\$675.02	\$0.00
21919	10/16/2015	112670	Parry	Keith	9/1/2014	9/26/2015	10/9/2015	98.95	\$1,067.62	\$0.00
21920	10/16/2015	3806	Pearson	Jon	4/1/2012	9/26/2015	10/9/2015	87.87	\$1,145.56	\$0.00
21922	10/16/2015	15968	Peterson	Kenneth	1/1/2009	9/26/2015	10/9/2015	116.68	\$1,740.49	\$0.00
21923	10/16/2015	1076	Peterson	Steven	7/1/2008	9/26/2015	10/9/2015	89.26	\$939.83	\$0.00

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21924	10/16/2015	109904	Phillips	Gary	5/1/2015	9/26/2015	10/9/2015	10.55	\$122.11	\$0.00
21925	10/16/2015	106089	Phillips	Larry	11/1/2013	9/26/2015	10/9/2015	105.08	\$1,078.63	\$0.00
21926	10/16/2015	2826	Pitts	Amir	7/1/2008	9/26/2015	10/9/2015	87.26	\$1,134.75	\$0.00
21927	10/16/2015	112342	Pizzimenti	Santo	5/1/2015	9/26/2015	10/9/2015	104.35	\$1,199.57	\$0.00
21928	10/16/2015	26679	Polchinski	Paul	9/1/2014	9/26/2015	10/9/2015	59.98	\$569.12	\$0.00
21929	10/16/2015	106825	Preza	Rowena	4/1/2015	9/26/2015	10/9/2015	75.85	\$712.38	\$0.00
21930	10/16/2015	109845	Pruitt	Charles	6/1/2015	9/26/2015	10/9/2015	132.17	\$1,355.72	\$0.00
21932	10/16/2015	23178	Raffensperger	Jeffrey	5/1/2014	9/26/2015	10/9/2015	118.44	\$1,469.77	\$0.00
21933	10/16/2015	113507	Ramirez-Ram	Omar	10/1/2015	9/26/2015	10/9/2015	104.69	\$1,350.81	\$0.00
21934	10/16/2015	103060	Ramos	David	9/1/2014	9/26/2015	10/9/2015	105.99	\$1,100.41	\$0.00
21935	10/16/2015	3812	Ray	William	4/1/2012	9/26/2015	10/9/2015	91.23	\$1,304.34	\$0.00
21937	10/16/2015	2237	Relopez	Craig	7/1/2008	9/26/2015	10/9/2015	91.63	\$891.80	\$0.00
21938	10/16/2015	113964	Rezaei	Ryan	5/1/2015	9/26/2015	10/9/2015	78.18	\$933.78	\$0.00
21939	10/16/2015	114453	Riazi	Seyedmoham	9/1/2015	9/26/2015	10/9/2015	58.08	\$592.66	\$0.00
21940	10/16/2015	113948	Riazi	Seyedmoham	5/1/2015	9/26/2015	10/9/2015	10.78	\$166.03	\$0.00
21941	10/16/2015	14261	Riipi	Karl	12/1/2013	9/26/2015	10/9/2015	68.81	\$593.83	\$0.00
21942	10/16/2015	111648	Robinson	Jeffrey	11/1/2014	9/26/2015	10/9/2015	76.98	\$761.78	\$0.00
21943	10/16/2015	104171	Robinson	Mikalani	5/1/2014	9/26/2015	10/9/2015	81.67	\$605.67	\$0.00
21944	10/16/2015	114033	Rodde	Thomas	5/1/2015	9/26/2015	10/9/2015	94.53	\$958.72	\$0.00
21945	10/16/2015	3814	Rohlas	Polly	4/1/2012	9/26/2015	10/9/2015	87.13	\$974.55	\$0.00
21947	10/16/2015	111078	Ross	Sherman	7/1/2015	9/26/2015	10/9/2015	75.33	\$705.83	\$0.00
21948	10/16/2015	112826	Sameh	Abdul	11/1/2014	9/26/2015	10/9/2015	105.74	\$1,346.44	\$0.00
21949	10/16/2015	29249	Sameni	Abbas	9/1/2014	9/26/2015	10/9/2015	92.56	\$899.45	\$0.00
21950	10/16/2015	108509	Sattari	Ahmad	12/1/2015	9/26/2015	10/9/2015	11.61	\$111.09	\$0.00
21951	10/16/2015	108213	Savino	Christopher	5/1/2015	9/26/2015	10/9/2015	80.56	\$759.52	\$0.00
21952	10/16/2015	105273	Sayed	Jamil	6/1/2012	9/26/2015	10/9/2015	109.72	\$1,215.39	\$0.00
21953	10/16/2015	25981	Schroeder	William	11/1/2008	9/26/2015	10/9/2015	85.31	\$785.53	\$0.00
21954	10/16/2015	105577	Seidman	Steven	9/1/2013	9/26/2015	10/9/2015	33.62	\$448.97	\$0.00
21955	10/16/2015	3359	Sevillet	Otto	8/1/2010	9/26/2015	10/9/2015	89.72	\$1,021.58	\$0.00
21956	10/16/2015	112766	Sibre	Christopher	8/1/2014	9/26/2015	10/9/2015	88.24	\$1,335.13	\$0.00
21957	10/16/2015	23388	Simmons	John	7/1/2008	9/26/2015	10/9/2015	87.13	\$986.88	\$0.00
21753	10/16/2015	114747	Slayton	David	11/1/2015	9/26/2015	10/9/2015	64.76	\$608.76	\$0.00
21958	10/16/2015	106103	Smallwood	Linn	4/1/2015	9/26/2015	10/9/2015	102.71	\$903.80	\$0.00
21959	10/16/2015	112181	Smith	Alex	6/1/2015	9/26/2015	10/9/2015	76.49	\$929.46	\$0.00
21931	10/16/2015	110015	Smith	Donna	11/1/2015	9/26/2015	10/9/2015	136.37	\$1,394.56	\$0.00
21961	10/16/2015	108547	Solano	Domingo	9/1/2015	9/26/2015	10/9/2015	92.63	\$1,121.97	\$0.00
21962	10/16/2015	2638	Soto	Jacob	7/1/2008	9/26/2015	10/9/2015	79.53	\$879.73	\$0.00
21963	10/16/2015	3757	Steck	Gregory	1/1/2012	9/26/2015	10/9/2015	94.54	\$986.14	\$0.00
21964	10/16/2015	3872	Stockton	Clarence	8/1/2012	9/26/2015	10/9/2015	113.13	\$1,206.79	\$0.00
21965	10/16/2015	25450	Tafesh	George	3/1/2009	9/26/2015	10/9/2015	92.50	\$1,031.81	\$0.00
21966	10/16/2015	112063	Tapia-Vergar	Agustin	5/1/2014	9/26/2015	10/9/2015	47.25	\$457.03	\$0.00
21967	10/16/2015	109384	Tarango	Jose	12/1/2015	9/26/2015	10/9/2015	121.65	\$1,180.77	\$0.00
21968	10/16/2015	109745	Taylor	David	12/1/2013	9/26/2015	10/9/2015	50.28	\$662.05	\$0.00
21969	10/16/2015	111463	Taylor	Fredrick	8/1/2015	9/26/2015	10/9/2015	106.50	\$960.00	\$0.00
21970	10/16/2015	102232	Thetprasit	Lou	2/1/2015	9/26/2015	10/9/2015	78.99	\$996.47	\$0.00
21971	10/16/2015	23143	Thomas	Marc	5/1/2015	9/26/2015	10/9/2015	94.03	\$1,058.32	\$0.00
21972	10/16/2015	3867	Thompson	Glen	8/1/2012	9/26/2015	10/9/2015	18.98	\$215.30	\$0.00
21973	10/16/2015	27963	Thompson	Michael	11/1/2011	9/26/2015	10/9/2015	95.64	\$862.70	\$0.00
21974	10/16/2015	114361	Toledano	Alexis	11/1/2015	9/26/2015	10/9/2015	102.13	\$818.07	\$0.00
21731	10/16/2015	22120	Travis	Brian	7/1/2008	9/26/2015	10/9/2015	29.91	\$274.43	\$0.00
21975	10/16/2015	104747	Trump	Robert	9/1/2014	9/26/2015	10/9/2015	65.28	\$512.83	\$0.00
21976	10/16/2015	20386	Tucker	Carl	6/1/2009	9/26/2015	10/9/2015	8.50	\$103.35	\$0.00
21977	10/16/2015	22597	Turner	James	10/1/2015	9/26/2015	10/9/2015	93.17	\$1,153.81	\$0.00
21978	10/16/2015	110836	Uba	Chima	8/1/2014	9/26/2015	10/9/2015	60.72	\$593.01	\$0.00

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21979	10/16/2015	111338	Valiente	Pedro	5/1/2015	9/26/2015	10/9/2015	104.40	\$891.58	\$0.00
21980	10/16/2015	113920	Vargo	Keli	4/1/2015	9/26/2015	10/9/2015	84.36	\$754.41	\$0.00
21981	10/16/2015	3721	Viado	Ramon	10/1/2011	9/26/2015	10/9/2015	91.80	\$968.65	\$0.00
21982	10/16/2015	104958	Volchek	Boris	2/1/2015	9/26/2015	10/9/2015	43.75	\$378.51	\$0.00
21983	10/16/2015	3796	Vongthep	Christopher	3/1/2012	9/26/2015	10/9/2015	105.52	\$1,091.27	\$0.00
21984	10/16/2015	3058	Wallace	James	5/1/2009	9/26/2015	10/9/2015	55.19	\$735.90	\$0.00
21985	10/16/2015	3820	Wallace	Roy	5/1/2012	9/26/2015	10/9/2015	26.34	\$191.07	\$0.00
21986	10/16/2015	100619	Walls	Charles	7/1/2015	9/26/2015	10/9/2015	69.85	\$642.36	\$0.00
21987	10/16/2015	113891	Washington	Kenneth	5/1/2015	9/26/2015	10/9/2015	96.95	\$748.63	\$0.00
21727	10/16/2015	109248	Waymark	Thomas	5/1/2015	9/26/2015	10/9/2015	31.24	\$279.49	\$0.00
21988	10/16/2015	3496	Weaver	Gerie	4/1/2011	9/26/2015	10/9/2015	65.50	\$541.92	\$0.00
21989	10/16/2015	2785	Welborn	Paul	5/1/2012	9/26/2015	10/9/2015	51.82	\$618.14	\$0.00
21990	10/16/2015	113682	Wible	Gregory	8/1/2015	9/26/2015	10/9/2015	57.59	\$522.40	\$0.00
21991	10/16/2015	113240	Woldemichael	Meles	11/1/2015	9/26/2015	10/9/2015	129.61	\$1,790.01	\$0.00
21992	10/16/2015	110866	Wolfe	Thomas	8/1/2013	9/26/2015	10/9/2015	71.05	\$796.06	\$0.00
21993	10/16/2015	3910	Wong	Jorge	1/1/2013	9/26/2015	10/9/2015	69.59	\$719.25	\$0.00
21995	10/16/2015	3092	Yabut	Gerry	6/1/2009	9/26/2015	10/9/2015	114.24	\$1,451.31	\$0.00
21728	10/16/2015	108389	Yamaguchi	Alicia	12/1/2012	9/26/2015	10/9/2015	38.65	\$407.90	\$0.00
21996	10/16/2015	114275	Yerima	Mollah	7/1/2015	9/26/2015	10/9/2015	89.29	\$975.76	\$0.00
21997	10/16/2015	114673	Yu	Lu	12/1/2015	9/26/2015	10/9/2015	10.08	\$99.28	\$0.00
21998	10/16/2015	113075	Yu	Mary	9/1/2015	9/26/2015	10/9/2015	112.71	\$993.95	\$0.00
21999	10/16/2015	30374	Zafar	John	6/1/2010	9/26/2015	10/9/2015	112.78	\$1,760.84	\$0.00
22000	10/16/2015	114189	Zaldivar	Maikel	11/1/2015	9/26/2015	10/9/2015	71.98	\$610.22	\$0.00
22001	10/16/2015	2273	Zawoudie	Masfen	7/1/2008	9/26/2015	10/9/2015	98.91	\$1,105.83	\$0.00
22002	10/16/2015	111519	Zghaier	Hassan	11/1/2015	9/26/2015	10/9/2015	91.15	\$1,117.08	\$0.00
22073	10/30/2015	112948	Abdalla	Mustafa	5/1/2015	10/10/2015	10/23/2015	110.10	\$1,282.73	\$0.00
22074	10/30/2015	2640	Abuel	Alan	7/1/2008	10/10/2015	10/23/2015	89.12	\$1,149.14	\$0.00
22075	10/30/2015	100221	Ackman	Charles	4/1/2013	10/10/2015	10/23/2015	44.29	\$484.48	\$0.00
22077	10/30/2015	24802	Altamirano	Keith	10/1/2014	10/10/2015	10/23/2015	103.11	\$1,281.85	\$0.00
22078	10/30/2015	103822	Alvarado	Santiago	9/1/2014	10/10/2015	10/23/2015	75.85	\$700.28	\$0.00
22079	10/30/2015	29709	Andersen	Jason	5/1/2009	10/10/2015	10/23/2015	90.07	\$693.35	\$0.00
22080	10/30/2015	106828	Anderson	Calvin	2/1/2013	10/10/2015	10/23/2015	97.80	\$996.63	\$0.00
22081	10/30/2015	114697	Anderson	Neal	10/1/2015	10/10/2015	10/23/2015	112.97	\$1,019.95	\$0.00
22082	10/30/2015	3650	Anif	Janeid	3/1/2012	10/10/2015	10/23/2015	55.97	\$705.43	\$0.00
22083	10/30/2015	114669	Anon	Nelson	10/1/2015	10/10/2015	10/23/2015	94.66	\$769.03	\$0.00
22084	10/30/2015	106151	Apodaca	Orlando	7/1/2015	10/10/2015	10/23/2015	122.48	\$1,027.87	\$0.00
22085	10/30/2015	3730	Arar	Isam	10/1/2011	10/10/2015	10/23/2015	61.44	\$645.00	\$0.00
22086	10/30/2015	25901	Armendinger	Shane	7/1/2008	10/10/2015	10/23/2015	92.22	\$997.00	\$0.00
22087	10/30/2015	26553	Arnwine	Howard	4/1/2012	10/10/2015	10/23/2015	56.42	\$512.75	\$0.00
22088	10/30/2015	113714	Arrandt	Robert	12/1/2015	10/10/2015	10/23/2015	109.03	\$790.91	\$0.00
22089	10/30/2015	113763	Arroyo	Carlos	10/1/2015	10/10/2015	10/23/2015	115.70	\$1,114.44	\$0.00
22090	10/30/2015	114195	Arzola	Juan	6/1/2015	10/10/2015	10/23/2015	140.62	\$1,873.65	\$0.00
22091	10/30/2015	103560	Awad	Edward	10/1/2015	10/10/2015	10/23/2015	91.59	\$900.13	\$0.00
22092	10/30/2015	113134	Baker	Jason	1/1/2016	10/10/2015	10/23/2015	73.52	\$598.62	\$0.00
22093	10/30/2015	112015	Bambenek	Matthew	3/1/2014	10/10/2015	10/23/2015	64.19	\$647.41	\$0.00
22094	10/30/2015	112978	Bancod	Michael	3/1/2015	10/10/2015	10/23/2015	71.84	\$565.27	\$0.00
22095	10/30/2015	100158	Barnes	Benjamin	9/1/2011	10/10/2015	10/23/2015	54.60	\$504.99	\$0.00
22096	10/30/2015	16654	Barnhart	John	7/1/2015	10/10/2015	10/23/2015	111.33	\$1,255.97	\$0.00
22097	10/30/2015	113542	Basoalto-San	Lucia	9/1/2015	10/10/2015	10/23/2015	116.79	\$1,461.41	\$0.00
22098	10/30/2015	2454	Batista	Eugenio	7/1/2008	10/10/2015	10/23/2015	79.11	\$989.82	\$0.00
22099	10/30/2015	100286	Bedane	Belay	3/1/2015	10/10/2015	10/23/2015	62.30	\$501.50	\$0.00
22100	10/30/2015	110687	Berger	James	5/1/2014	10/10/2015	10/23/2015	94.05	\$1,213.82	\$0.00
22101	10/30/2015	112830	Bestard-Sanc	Vladimir	12/1/2015	10/10/2015	10/23/2015	59.31	\$470.78	\$0.00
22102	10/30/2015	23373	Bey	Ronald	4/1/2009	10/10/2015	10/23/2015	62.21	\$801.30	\$0.00

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22103	10/30/2015	3581	Borges	Antonio	9/1/2011	10/10/2015	10/23/2015	58.52	\$663.75	\$0.00
22104	10/30/2015	101034	Bower	Terry	3/1/2015	10/10/2015	10/23/2015	98.44	\$1,123.98	\$0.00
22106	10/30/2015	3949	Brown	Daniel	4/1/2013	10/10/2015	10/23/2015	28.90	\$1,021.00	\$0.00
22107	10/30/2015	107492	Brown	Jimmy	9/1/2014	10/10/2015	10/23/2015	100.12	\$1,014.46	\$0.00
22108	10/30/2015	106463	Capone	Gary	2/1/2014	10/10/2015	10/23/2015	87.11	\$867.78	\$0.00
22109	10/30/2015	2660	Carracedo	Sonny	7/1/2008	10/10/2015	10/23/2015	107.96	\$1,637.12	\$0.00
22110	10/30/2015	3899	Casiello	Anthony	12/1/2012	10/10/2015	10/23/2015	88.02	\$878.28	\$0.00
22111	10/30/2015	102334	Castellanos	Joaquin	8/1/2014	10/10/2015	10/23/2015	83.20	\$787.83	\$0.00
22112	10/30/2015	103777	Castro-Jaen	Lazaro	12/1/2015	10/10/2015	10/23/2015	81.08	\$815.55	\$0.00
22113	10/30/2015	21398	Chenpanas	Surapan	11/1/2015	10/10/2015	10/23/2015	95.92	\$944.70	\$0.00
22114	10/30/2015	29301	Cicerchi	Michael	12/1/2015	10/10/2015	10/23/2015	113.05	\$1,217.43	\$0.00
22115	10/30/2015	106890	Co	Pedro	11/1/2015	10/10/2015	10/23/2015	109.63	\$891.69	\$0.00
22116	10/30/2015	2051	Costello	Brad	7/1/2008	10/10/2015	10/23/2015	83.66	\$821.72	\$0.00
22117	10/30/2015	15756	Craddock	Mason	12/1/2015	10/10/2015	10/23/2015	65.68	\$476.69	\$0.00
22118	10/30/2015	109796	Curtin	Ronald	7/1/2013	10/10/2015	10/23/2015	71.74	\$741.83	\$0.00
22119	10/30/2015	112564	Cyiark	Billy	9/1/2015	10/10/2015	10/23/2015	128.25	\$1,024.36	\$0.00
22120	10/30/2015	109130	Dacayanan	Liza	9/1/2013	10/10/2015	10/23/2015	109.87	\$1,318.10	\$0.00
22121	10/30/2015	23948	Daffron	Daniel	6/1/2013	10/10/2015	10/23/2015	53.86	\$548.63	\$0.00
22122	10/30/2015	110936	Daniels	James	7/1/2013	10/10/2015	10/23/2015	81.68	\$1,024.36	\$0.00
22123	10/30/2015	111137	Dejacto	Giovanna	10/1/2013	10/10/2015	10/23/2015	116.05	\$1,135.03	\$0.00
22124	10/30/2015	112508	Demick Jr.	William	3/1/2015	10/10/2015	10/23/2015	124.86	\$1,284.05	\$0.00
22125	10/30/2015	3936	Dial	Donald	3/1/2013	10/10/2015	10/23/2015	63.57	\$564.78	\$0.00
22126	10/30/2015	111351	Diomande	Almamy	6/1/2015	10/10/2015	10/23/2015	89.07	\$896.00	\$0.00
22127	10/30/2015	3756	Disbrow	Ronald	1/1/2012	10/10/2015	10/23/2015	60.88	\$514.28	\$0.00
22128	10/30/2015	3395	Dixon	Julius	11/1/2010	10/10/2015	10/23/2015	107.75	\$1,467.37	\$0.00
22129	10/30/2015	114946	Dopson	Gary	1/1/2016	10/10/2015	10/23/2015	108.18	\$784.16	\$0.14
22130	10/30/2015	2006	Durtschi	Jeffrey	7/1/2008	10/10/2015	10/23/2015	91.85	\$1,010.13	\$0.00
22131	10/30/2015	112745	Ebert	Michael	12/1/2015	10/10/2015	10/23/2015	118.20	\$1,120.72	\$0.00
22132	10/30/2015	2637	Edwards	Jeffrey	7/1/2008	10/10/2015	10/23/2015	84.38	\$753.10	\$0.00
22133	10/30/2015	3595	Ekoue	Ayi	10/1/2011	10/10/2015	10/23/2015	104.50	\$999.07	\$0.00
22134	10/30/2015	109641	Emling	Paul	8/1/2012	10/10/2015	10/23/2015	28.70	\$425.12	\$0.00
22135	10/30/2015	108744	Esparza	Francisco	4/1/2015	10/10/2015	10/23/2015	103.64	\$951.63	\$0.00
22137	10/30/2015	112418	Faye	Pape	11/1/2015	10/10/2015	10/23/2015	95.53	\$1,022.44	\$0.00
22138	10/30/2015	104153	Feller	Anthony	12/1/2015	10/10/2015	10/23/2015	111.38	\$920.06	\$0.00
22139	10/30/2015	108011	Fernandez-Le	Alexander	6/1/2015	10/10/2015	10/23/2015	39.12	\$355.91	\$0.00
22140	10/30/2015	3549	Fesehazion	Teabe	7/1/2011	10/10/2015	10/23/2015	76.16	\$813.37	\$0.00
22141	10/30/2015	109381	Fitzsimmons	Marc	8/1/2014	10/10/2015	10/23/2015	87.76	\$724.90	\$0.00
22142	10/30/2015	30616	Flores	Abner	10/1/2014	10/10/2015	10/23/2015	115.28	\$1,105.73	\$0.00
22143	10/30/2015	114873	Flournoy	Carr	12/1/2015	10/10/2015	10/23/2015	116.30	\$842.66	\$0.52
22144	10/30/2015	25493	Fragoza	Michael	5/1/2015	10/10/2015	10/23/2015	68.40	\$634.68	\$0.00
22145	10/30/2015	24791	Garcia	Anthony	6/1/2013	10/10/2015	10/23/2015	82.85	\$993.26	\$0.00
22146	10/30/2015	2782	Garcia	John	7/1/2008	10/10/2015	10/23/2015	112.46	\$1,007.44	\$0.00
22147	10/30/2015	111531	Gay	Phillip	8/1/2015	10/10/2015	10/23/2015	93.98	\$845.27	\$0.00
22148	10/30/2015	113914	Gazzara	Anthony	4/1/2015	10/10/2015	10/23/2015	97.73	\$811.55	\$0.00
22149	10/30/2015	29297	Gebremichea	Yohannes	9/1/2014	10/10/2015	10/23/2015	41.27	\$330.89	\$0.00
22150	10/30/2015	3696	Gillett	David	5/1/2012	10/10/2015	10/23/2015	48.38	\$399.93	\$0.00
22050	10/30/2015	3121	Gleason	John	8/1/2009	10/10/2015	10/23/2015	27.25	\$322.97	\$0.00
22151	10/30/2015	114601	Godfrey	Brenda	10/1/2015	10/10/2015	10/23/2015	135.59	\$1,336.52	\$0.00
22152	10/30/2015	106897	Goettsche	Dale	6/1/2013	10/10/2015	10/23/2015	92.59	\$1,162.37	\$0.00
22153	10/30/2015	102141	Gray	Charles	1/1/2016	10/10/2015	10/23/2015	65.28	\$708.71	\$0.00
22154	10/30/2015	19253	Gray	Gary	4/1/2012	10/10/2015	10/23/2015	69.31	\$681.01	\$0.00
22076	10/30/2015	111916	Gray	Kenneth	12/1/2015	10/10/2015	10/23/2015	69.40	\$581.59	\$0.00
22155	10/30/2015	102800	Habte	Micheal	10/1/2015	10/10/2015	10/23/2015	112.20	\$1,413.43	\$0.00
22156	10/30/2015	21446	Handlon	Michael	6/1/2013	10/10/2015	10/23/2015	83.62	\$805.78	\$0.00

Check Number	Payroll Check Date	Payroll Records Employee Account Number	Last Name	First Name	Date Became Qualified for Health Insurance	Pay Period Start Date	Pay Period End Date	Hours for Pay Period From Payroll Records	Total Wages Paid	Minimum Wages Owed at \$7.25 an Hour for all Hours
22157	10/30/2015	3402	Hansen	Jordan	11/1/2010	10/10/2015	10/23/2015	114.25	\$1,118.22	\$0.00
22158	10/30/2015	3855	Harris	Dennis	6/1/2012	10/10/2015	10/23/2015	77.54	\$737.88	\$0.00
22159	10/30/2015	19800	Hasbrouck Jr	Ronald	9/1/2015	10/10/2015	10/23/2015	99.78	\$1,091.06	\$0.00
22160	10/30/2015	112912	Hassanzadeh	Davoud	11/1/2014	10/10/2015	10/23/2015	71.02	\$819.84	\$0.00
22161	10/30/2015	102378	Hatch Jr.	Frank	4/1/2015	10/10/2015	10/23/2015	40.35	\$330.24	\$0.00
22162	10/30/2015	114928	Herrlich	Curt	1/1/2016	10/10/2015	10/23/2015	84.19	\$636.46	\$0.00
22163	10/30/2015	2097	Hinks	Dana	7/1/2008	10/10/2015	10/23/2015	99.99	\$932.95	\$0.00
22164	10/30/2015	32082	Hoffman	Gary	4/1/2009	10/17/2015	10/23/2015	65.71	\$505.38	\$0.00
22166	10/30/2015	2751	Hurtado	Hubert	7/1/2008	10/10/2015	10/23/2015	49.17	\$484.89	\$0.00
22167	10/30/2015	3187	Isaac	Edsel	10/1/2009	10/10/2015	10/23/2015	71.50	\$904.25	\$0.00
22169	10/30/2015	107992	Jacobi	Donald	8/1/2013	10/10/2015	10/23/2015	10.03	\$72.75	\$0.00
22170	10/30/2015	3020	Jarmosco	John	3/1/2009	10/10/2015	10/23/2015	98.85	\$1,594.25	\$0.00
22171	10/30/2015	15638	Jawaid	Shaikh	11/1/2015	10/10/2015	10/23/2015	109.70	\$964.41	\$0.00
22172	10/30/2015	28842	Jimerson-Ces	Jo A	8/1/2015	10/10/2015	10/23/2015	73.62	\$712.36	\$0.00
22173	10/30/2015	29542	Kang	Chong	8/1/2009	10/10/2015	10/23/2015	73.97	\$819.67	\$0.00
22174	10/30/2015	106153	Keller	Roger	7/1/2013	10/10/2015	10/23/2015	77.03	\$745.81	\$0.00
22175	10/30/2015	2736	Kenary	Brian	7/1/2008	10/10/2015	10/23/2015	63.50	\$562.51	\$0.00
22176	10/30/2015	27999	Khan	Zia-Ur-Rehma	7/1/2015	10/10/2015	10/23/2015	126.52	\$979.69	\$0.00
22177	10/30/2015	107692	Kim	Chang	5/1/2015	10/10/2015	10/23/2015	108.72	\$1,496.07	\$0.00
22179	10/30/2015	3893	Klein	Phillip	11/1/2012	10/10/2015	10/23/2015	78.00	\$565.33	\$0.17
22180	10/30/2015	114375	Ko	Kuen	12/1/2015	10/10/2015	10/23/2015	111.66	\$1,226.65	\$0.00
22181	10/30/2015	3630	Kogan	Martin	1/1/2012	10/10/2015	10/23/2015	54.87	\$500.78	\$0.00
22182	10/30/2015	105627	Kronenberg	Arthur	4/1/2015	10/10/2015	10/23/2015	73.21	\$604.54	\$0.00
22183	10/30/2015	103826	Kull Jr.	William	6/1/2014	10/10/2015	10/23/2015	43.33	\$530.54	\$0.00
22184	10/30/2015	107625	Lafarge	Jeannine	7/1/2014	10/10/2015	10/23/2015	91.90	\$1,493.51	\$0.00
22185	10/30/2015	114766	Laughinghouse	Charles	11/1/2015	10/10/2015	10/23/2015	115.97	\$982.09	\$0.00
22186	10/30/2015	111290	Lay	Gilbert	7/1/2014	10/10/2015	10/23/2015	83.16	\$1,004.31	\$0.00
22188	10/30/2015	3685	Leal	Jill	5/1/2012	10/10/2015	10/23/2015	96.19	\$1,215.01	\$0.00
22189	10/30/2015	108034	Leonardi	Kevin	11/1/2015	10/10/2015	10/23/2015	66.91	\$702.80	\$0.00
22190	10/30/2015	15804	Little	Dennis	12/1/2011	10/10/2015	10/23/2015	85.21	\$780.13	\$0.00
22191	10/30/2015	18903	Lozada	Giovanni	8/1/2015	10/17/2015	10/23/2015	74.29	\$899.14	\$0.00
22192	10/30/2015	3778	Macato	Jaime	1/1/2012	10/10/2015	10/23/2015	112.55	\$1,232.31	\$0.00
22193	10/30/2015	18640	Mahtani	Ratan	7/1/2015	10/10/2015	10/23/2015	45.78	\$384.48	\$0.00
22194	10/30/2015	100830	Mahyar	Yamine	1/1/2016	10/10/2015	10/23/2015	92.04	\$1,011.82	\$0.00
22195	10/30/2015	2757	Majors	John	7/1/2008	10/10/2015	10/23/2015	70.21	\$541.87	\$0.00
22196	10/30/2015	31483	Malapira	Roberto	5/1/2015	10/10/2015	10/23/2015	59.31	\$639.28	\$0.00
22197	10/30/2015	3583	Maras	Maria	10/1/2011	10/10/2015	10/23/2015	99.49	\$1,191.84	\$0.00
22198	10/30/2015	110053	Martinez	Francisco	8/1/2013	10/10/2015	10/23/2015	71.41	\$822.05	\$0.00
22199	10/30/2015	110618	Mastrio	Pamela	5/1/2014	10/10/2015	10/23/2015	71.95	\$862.77	\$0.00
22200	10/30/2015	110395	Maxwell	Charles	11/1/2015	10/10/2015	10/23/2015	26.02	\$204.42	\$0.00
22201	10/30/2015	2587	McCarter	Patrick	7/1/2008	10/10/2015	10/23/2015	88.34	\$785.18	\$0.00
22202	10/30/2015	113696	McGinn	Randall	11/1/2015	10/10/2015	10/23/2015	45.54	\$398.13	\$0.00
22203	10/30/2015	25641	McSkimming	John	5/1/2014	10/10/2015	10/23/2015	56.63	\$501.09	\$0.00
22204	10/30/2015	101698	Mecke	Robert	1/1/2016	10/10/2015	10/23/2015	78.24	\$585.44	\$0.00
22205	10/30/2015	29265	Micu	Emilio	9/1/2014	10/10/2015	10/23/2015	97.65	\$1,160.82	\$0.00
22206	10/30/2015	114922	Middleton	Shawn	12/1/2015	10/10/2015	10/23/2015	101.35	\$973.73	\$0.00
22207	10/30/2015	30196	Miller	Jason	11/1/2013	10/10/2015	10/23/2015	61.48	\$627.37	\$0.00
22208	10/30/2015	112009	Mock	Karen	10/1/2014	10/10/2015	10/23/2015	121.70	\$1,115.00	\$0.00
22209	10/30/2015	101935	Mohamed	Hamza	9/1/2014	10/10/2015	10/23/2015	116.10	\$1,786.83	\$0.00
22210	10/30/2015	105284	Monforte II	Peter	1/1/2012	10/10/2015	10/23/2015	121.27	\$1,087.30	\$0.00
22211	10/30/2015	3664	Moreno	James	3/1/2012	10/10/2015	10/23/2015	112.13	\$882.23	\$0.00
22212	10/30/2015	112561	Morgan	Sherryl	2/1/2015	10/10/2015	10/23/2015	73.69	\$640.77	\$0.00
22213	10/30/2015	8321	Morris	Thomas	1/1/2012	10/10/2015	10/23/2015	72.12	\$735.88	\$0.00
22214	10/30/2015	107704	Muhtari	Abdulrahman	2/1/2013	10/10/2015	10/23/2015	109.05	\$1,428.32	\$0.00

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22215	10/30/2015	109569	Munoz-Ferna	Ariel	12/1/2015	10/10/2015	10/23/2015	68.00	\$670.91	\$0.00
22216	10/30/2015	3847	Murawski	Richard	6/1/2012	10/10/2015	10/23/2015	84.98	\$1,084.31	\$0.00
22049	10/30/2015	107440	Nantista	Peter	3/1/2013	10/10/2015	10/23/2015	17.04	\$123.46	\$0.08
22217	10/30/2015	113865	Nelson	Jack	1/1/2016	10/10/2015	10/23/2015	113.45	\$1,129.15	\$0.00
22219	10/30/2015	27001	Olson	David	10/1/2015	10/10/2015	10/23/2015	76.14	\$672.14	\$0.00
22220	10/30/2015	3868	Olson	Eric	8/1/2012	10/10/2015	10/23/2015	103.34	\$1,109.62	\$0.00
22221	10/30/2015	107567	Ordaz	Guillermo	7/1/2015	10/10/2015	10/23/2015	79.99	\$612.51	\$0.00
22222	10/30/2015	3717	Ozgulgec	Tunc	10/1/2011	10/10/2015	10/23/2015	83.97	\$870.74	\$0.00
22223	10/30/2015	110552	Padilla	Rosemarie	5/1/2015	10/10/2015	10/23/2015	33.80	\$250.04	\$0.00
22224	10/30/2015	31283	Pak	Sam	7/1/2008	10/10/2015	10/23/2015	82.73	\$1,050.50	\$0.00
22225	10/30/2015	112670	Parry	Keith	9/1/2014	10/10/2015	10/23/2015	96.81	\$907.03	\$0.00
22226	10/30/2015	3806	Pearson	Jon	4/1/2012	10/10/2015	10/23/2015	88.17	\$1,108.11	\$0.00
22228	10/30/2015	15968	Peterson	Kenneth	1/1/2009	10/10/2015	10/23/2015	117.45	\$1,712.88	\$0.00
22229	10/30/2015	1076	Peterson	Steven	7/1/2008	10/10/2015	10/23/2015	86.26	\$938.58	\$0.00
22230	10/30/2015	106089	Phillips	Larry	11/1/2013	10/10/2015	10/23/2015	107.05	\$1,158.37	\$0.00
22231	10/30/2015	2826	Pitts	Amir	7/1/2008	10/10/2015	10/23/2015	98.69	\$1,190.66	\$0.00
22232	10/30/2015	112342	Pizzimenti	Santo	5/1/2015	10/10/2015	10/23/2015	108.40	\$1,115.69	\$0.00
22233	10/30/2015	26679	Polchinski	Paul	9/1/2014	10/10/2015	10/23/2015	55.62	\$565.09	\$0.00
22234	10/30/2015	106825	Preza	Rowena	4/1/2015	10/10/2015	10/23/2015	83.16	\$808.97	\$0.00
22235	10/30/2015	109845	Pruitt	Charles	6/1/2015	10/10/2015	10/23/2015	120.32	\$1,087.54	\$0.00
22237	10/30/2015	23178	Raffensparger	Jeffrey	5/1/2014	10/10/2015	10/23/2015	130.38	\$1,573.69	\$0.00
22238	10/30/2015	113507	Ramirez-Ram	Omar	10/1/2015	10/10/2015	10/23/2015	105.75	\$1,326.51	\$0.00
22239	10/30/2015	103060	Ramos	David	9/1/2014	10/10/2015	10/23/2015	53.48	\$467.33	\$0.00
22240	10/30/2015	3812	Ray	William	4/1/2012	10/10/2015	10/23/2015	43.18	\$454.49	\$0.00
22242	10/30/2015	2237	Relopez	Craig	7/1/2008	10/10/2015	10/23/2015	72.43	\$570.86	\$0.00
22243	10/30/2015	113964	Rezaei	Ryan	5/1/2015	10/10/2015	10/23/2015	79.19	\$965.25	\$0.00
22244	10/30/2015	113948	Riazi	Seyedmoham	5/1/2015	10/10/2015	10/23/2015	116.84	\$1,232.60	\$0.00
22245	10/30/2015	14261	Riipi	Karl	12/1/2013	10/10/2015	10/23/2015	91.89	\$1,070.87	\$0.00
22246	10/30/2015	111648	Robinson	Jeffrey	11/1/2014	10/10/2015	10/23/2015	88.09	\$890.81	\$0.00
22247	10/30/2015	104171	Robinson	Mikalani	5/1/2014	10/10/2015	10/23/2015	76.26	\$568.34	\$0.00
22248	10/30/2015	114033	Rodde	Thomas	5/1/2015	10/10/2015	10/23/2015	85.93	\$728.71	\$0.00
22249	10/30/2015	3814	Rohlas	Polly	4/1/2012	10/10/2015	10/23/2015	74.88	\$835.24	\$0.00
22251	10/30/2015	111078	Ross	Sherman	7/1/2015	10/10/2015	10/23/2015	97.26	\$799.36	\$0.00
22252	10/30/2015	112826	Sameh	Abdul	11/1/2014	10/10/2015	10/23/2015	96.09	\$1,328.10	\$0.00
22253	10/30/2015	29249	Sameni	Abbas	9/1/2014	10/10/2015	10/23/2015	76.39	\$742.48	\$0.00
22031	10/30/2015	108509	Sattari	Ahmad	12/1/2015	10/10/2015	10/23/2015	21.62	\$173.86	\$0.00
22254	10/30/2015	108213	Savino	Christopher	5/1/2015	10/10/2015	10/23/2015	78.92	\$715.98	\$0.00
22255	10/30/2015	105273	Sayed	Jamil	6/1/2012	10/10/2015	10/23/2015	120.87	\$1,376.66	\$0.00
22256	10/30/2015	25981	Schroeder	William	11/1/2008	10/10/2015	10/23/2015	99.64	\$897.55	\$0.00
22257	10/30/2015	3359	Sevillet	Otto	8/1/2010	10/10/2015	10/23/2015	89.37	\$979.90	\$0.00
22258	10/30/2015	112766	Sibre	Christopher	8/1/2014	10/10/2015	10/23/2015	92.11	\$1,256.94	\$0.00
22259	10/30/2015	23388	Simmons	John	7/1/2008	10/10/2015	10/23/2015	78.43	\$890.08	\$0.00
22260	10/30/2015	106103	Smallwood	Linn	4/1/2015	10/10/2015	10/23/2015	97.89	\$803.61	\$0.00
22236	10/30/2015	110015	Smith	Donna	11/1/2015	10/10/2015	10/23/2015	137.31	\$1,336.32	\$0.00
22262	10/30/2015	108547	Solano	Domingo	9/1/2015	10/10/2015	10/23/2015	99.64	\$1,196.22	\$0.00
22263	10/30/2015	2638	Soto	Jacob	7/1/2008	10/10/2015	10/23/2015	117.96	\$1,181.94	\$0.00
22264	10/30/2015	3757	Steck	Gregory	1/1/2012	10/10/2015	10/23/2015	93.35	\$920.30	\$0.00
22265	10/30/2015	3872	Stockton	Clarence	8/1/2012	10/10/2015	10/23/2015	116.81	\$1,249.70	\$0.00
22266	10/30/2015	25450	Tafesh	George	3/1/2009	10/10/2015	10/23/2015	57.86	\$555.24	\$0.00
22267	10/30/2015	112063	Tapia-Vergar	Agustin	5/1/2014	10/10/2015	10/23/2015	96.96	\$968.10	\$0.00
22268	10/30/2015	109384	Tarango	Jose	12/1/2015	10/10/2015	10/23/2015	123.08	\$1,638.51	\$0.00
22269	10/30/2015	109745	Taylor	David	12/1/2013	10/10/2015	10/23/2015	58.77	\$654.03	\$0.00
22270	10/30/2015	111463	Taylor	Fredrick	8/1/2015	10/10/2015	10/23/2015	86.21	\$682.99	\$0.00
22271	10/30/2015	102232	Thetprasit	Lou	2/1/2015	10/10/2015	10/23/2015	87.82	\$1,075.17	\$0.00

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22272	10/30/2015	23143	Thomas	Marc	5/1/2015	10/10/2015	10/23/2015	91.28	\$960.66	\$0.00
22273	10/30/2015	3867	Thompson	Glen	8/1/2012	10/10/2015	10/23/2015	67.54	\$585.59	\$0.00
22274	10/30/2015	27963	Thompson	Michael	11/1/2011	10/10/2015	10/23/2015	86.75	\$677.34	\$0.00
22275	10/30/2015	114361	Toledano	Alexis	11/1/2015	10/10/2015	10/23/2015	108.35	\$978.72	\$0.00
22276	10/30/2015	104747	Trumpf	Robert	9/1/2014	10/10/2015	10/23/2015	57.08	\$424.14	\$0.00
22277	10/30/2015	20386	Tucker	Carl	6/1/2009	10/10/2015	10/23/2015	9.66	\$105.50	\$0.00
22278	10/30/2015	22597	Turner	James	10/1/2015	10/10/2015	10/23/2015	106.34	\$1,267.13	\$0.00
22279	10/30/2015	110836	Uba	Chima	8/1/2014	10/10/2015	10/23/2015	62.09	\$588.37	\$0.00
22280	10/30/2015	111338	Valiente	Pedro	5/1/2015	10/10/2015	10/23/2015	112.19	\$1,082.16	\$0.00
22281	10/30/2015	113920	Vargo	Keli	4/1/2015	10/10/2015	10/23/2015	85.78	\$837.01	\$0.00
22282	10/30/2015	104958	Volchek	Boris	2/1/2015	10/10/2015	10/23/2015	19.68	\$273.43	\$0.00
22283	10/30/2015	3796	Vongthep	Christopher	3/1/2012	10/10/2015	10/23/2015	104.45	\$1,080.25	\$0.00
22284	10/30/2015	3058	Wallace	James	5/1/2009	10/10/2015	10/23/2015	58.26	\$723.63	\$0.00
22285	10/30/2015	3820	Wallace	Roy	5/1/2012	10/10/2015	10/23/2015	77.64	\$563.23	\$0.00
22286	10/30/2015	100619	Walls	Charles	7/1/2015	10/10/2015	10/23/2015	73.34	\$710.33	\$0.00
22287	10/30/2015	113891	Washington	Kenneth	5/1/2015	10/10/2015	10/23/2015	96.16	\$735.89	\$0.00
22288	10/30/2015	3496	Weaver	Gerie	4/1/2011	10/10/2015	10/23/2015	70.12	\$642.95	\$0.00
22289	10/30/2015	2785	Welborn	Paul	5/1/2012	10/10/2015	10/23/2015	54.11	\$625.40	\$0.00
22290	10/30/2015	113682	Wible	Gregory	8/1/2015	10/10/2015	10/23/2015	58.07	\$579.62	\$0.00
22291	10/30/2015	113240	Woldemichael	Meles	11/1/2015	10/10/2015	10/23/2015	127.00	\$1,694.07	\$0.00
22292	10/30/2015	110866	Wolfe	Thomas	8/1/2013	10/10/2015	10/23/2015	57.17	\$669.08	\$0.00
22293	10/30/2015	3910	Wong	Jorge	1/1/2013	10/10/2015	10/23/2015	69.04	\$713.56	\$0.00
22295	10/30/2015	3092	Yabut	Gerry	6/1/2009	10/10/2015	10/23/2015	116.79	\$1,252.66	\$0.00
22296	10/30/2015	114275	Yerima	Mollah	7/1/2015	10/10/2015	10/23/2015	96.45	\$1,043.78	\$0.00
22032	10/30/2015	114673	Yu	Lu	12/1/2015	10/10/2015	10/23/2015	38.60	\$338.16	\$0.00
22297	10/30/2015	113075	Yu	Mary	9/1/2015	10/10/2015	10/23/2015	115.46	\$1,088.99	\$0.00
22298	10/30/2015	30374	Zafar	John	6/1/2010	10/10/2015	10/23/2015	101.49	\$1,445.79	\$0.00
22299	10/30/2015	114189	Zaldivar	Maikel	11/1/2015	10/10/2015	10/23/2015	81.63	\$946.02	\$0.00
22300	10/30/2015	2273	Zawoudie	Masfen	7/1/2008	10/10/2015	10/23/2015	73.81	\$915.20	\$0.00
22301	10/30/2015	111519	Zghaier	Hassan	11/1/2015	10/10/2015	10/23/2015	99.64	\$870.99	\$0.00
22372	11/13/2015	112948	Abdalla	Mustafa	5/1/2015	10/24/2015	11/6/2015	81.60	\$857.07	\$0.00
22373	11/13/2015	2640	Abuel	Alan	7/1/2008	10/24/2015	11/6/2015	110.74	\$1,428.67	\$0.00
22374	11/13/2015	100221	Ackman	Charles	4/1/2013	10/24/2015	11/6/2015	89.13	\$826.20	\$0.00
22375	11/13/2015	109164	Alardi	Steven	1/1/2016	10/24/2015	11/6/2015	101.68	\$1,173.67	\$0.00
22377	11/13/2015	24802	Altamirano	Keith	10/1/2014	10/24/2015	11/6/2015	102.92	\$1,280.07	\$0.00
22378	11/13/2015	103822	Alvarado	Santiago	9/1/2014	10/24/2015	11/6/2015	109.28	\$888.79	\$0.00
22379	11/13/2015	29709	Andersen	Jason	5/1/2009	10/24/2015	11/6/2015	103.50	\$798.53	\$0.00
22380	11/13/2015	106828	Anderson	Calvin	2/1/2013	10/24/2015	11/6/2015	87.97	\$752.56	\$0.00
22381	11/13/2015	114697	Anderson	Neal	10/1/2015	10/24/2015	11/6/2015	105.61	\$1,084.44	\$0.00
22382	11/13/2015	3650	Anif	Janeid	3/1/2012	10/24/2015	11/6/2015	83.63	\$1,002.63	\$0.00
22383	11/13/2015	114669	Anon	Nelson	10/1/2015	10/24/2015	11/6/2015	76.43	\$658.17	\$0.00
22384	11/13/2015	106151	Apodaca	Orlando	7/1/2015	10/24/2015	11/6/2015	118.97	\$940.24	\$0.00
22385	11/13/2015	3730	Arar	Isam	10/1/2011	10/24/2015	11/6/2015	69.80	\$667.32	\$0.00
22386	11/13/2015	25901	Armendinger	Shane	7/1/2008	10/24/2015	11/6/2015	22.55	\$184.29	\$0.00
22387	11/13/2015	26553	Arnwine	Howard	4/1/2012	10/24/2015	11/6/2015	64.74	\$643.19	\$0.00
22388	11/13/2015	113714	Arrandt	Robert	12/1/2015	10/24/2015	11/6/2015	109.88	\$924.33	\$0.00
22389	11/13/2015	113763	Arroyo	Carlos	10/1/2015	10/24/2015	11/6/2015	103.29	\$1,056.75	\$0.00
22390	11/13/2015	114195	Arzola	Juan	6/1/2015	10/24/2015	11/6/2015	140.85	\$1,957.97	\$0.00
22391	11/13/2015	103560	Awad	Edward	10/1/2015	10/24/2015	11/6/2015	98.07	\$964.16	\$0.00
22392	11/13/2015	113134	Baker	Jason	1/1/2016	10/24/2015	11/6/2015	92.21	\$807.00	\$0.00
22393	11/13/2015	112015	Bambenek	Matthew	3/1/2014	10/24/2015	11/6/2015	71.81	\$828.67	\$0.00
22394	11/13/2015	112978	Bancod	Michael	3/1/2015	10/24/2015	11/6/2015	96.73	\$785.48	\$0.00
22395	11/13/2015	100158	Barnes	Benjamin	9/1/2011	10/24/2015	11/6/2015	88.08	\$811.16	\$0.00
22396	11/13/2015	16654	Barnhart	John	7/1/2015	10/24/2015	11/6/2015	101.74	\$951.18	\$0.00

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22397	11/13/2015	26073	Barnola	Rafael	1/1/2016	10/24/2015	11/6/2015	67.56	\$717.91	\$0.00
22398	11/13/2015	113542	Basoalto-San	Lucia	9/1/2015	10/24/2015	11/6/2015	113.85	\$1,351.50	\$0.00
22399	11/13/2015	2454	Batista	Eugenio	7/1/2008	10/24/2015	11/6/2015	89.89	\$966.30	\$0.00
22400	11/13/2015	100286	Bedane	Belay	3/1/2015	10/24/2015	11/6/2015	87.53	\$667.19	\$0.00
22401	11/13/2015	110687	Berger	James	5/1/2014	10/24/2015	11/6/2015	97.55	\$1,078.92	\$0.00
22402	11/13/2015	112830	Bestard-Sanc	Vladimir	12/1/2015	10/24/2015	11/6/2015	77.55	\$562.20	\$0.04
22403	11/13/2015	23373	Bey	Ronald	4/1/2009	10/24/2015	11/6/2015	58.08	\$742.11	\$0.00
22404	11/13/2015	3581	Borges	Antonio	9/1/2011	10/24/2015	11/6/2015	68.89	\$714.69	\$0.00
22405	11/13/2015	101034	Bower	Terry	3/1/2015	10/24/2015	11/6/2015	108.63	\$1,218.07	\$0.00
22407	11/13/2015	3949	Brown	Daniel	4/1/2013	10/24/2015	11/6/2015	31.80	\$1,210.41	\$0.00
22408	11/13/2015	107492	Brown	Jimmy	9/1/2014	10/24/2015	11/6/2015	79.47	\$847.47	\$0.00
22409	11/13/2015	106463	Capone	Gary	2/1/2014	10/24/2015	11/6/2015	82.48	\$718.54	\$0.00
22410	11/13/2015	2660	Carracedo	Sonny	7/1/2008	10/24/2015	11/6/2015	97.49	\$1,091.10	\$0.00
22411	11/13/2015	3899	Casiello	Anthony	12/1/2012	10/24/2015	11/6/2015	85.88	\$806.67	\$0.00
22412	11/13/2015	102334	Castellanos	Joaquin	8/1/2014	10/24/2015	11/6/2015	97.23	\$799.59	\$0.00
22413	11/13/2015	103777	Castro-Jaen	Lazaro	12/1/2015	10/24/2015	11/6/2015	64.38	\$517.82	\$0.00
22414	11/13/2015	21398	Chenpanas	Surapan	11/1/2015	10/24/2015	11/6/2015	95.73	\$918.58	\$0.00
22415	11/13/2015	29301	Cicerchi	Michael	12/1/2015	10/24/2015	11/6/2015	110.07	\$1,096.43	\$0.00
22416	11/13/2015	106890	Co	Pedro	11/1/2015	10/24/2015	11/6/2015	87.27	\$686.55	\$0.00
22417	11/13/2015	2051	Costello	Brad	7/1/2008	10/24/2015	11/6/2015	98.37	\$1,001.00	\$0.00
22418	11/13/2015	15756	Craddock	Mason	12/1/2015	10/24/2015	11/6/2015	64.13	\$464.95	\$0.00
22419	11/13/2015	109796	Curtin	Ronald	7/1/2013	10/24/2015	11/6/2015	86.49	\$787.37	\$0.00
22420	11/13/2015	112564	Cyiark	Billy	9/1/2015	10/24/2015	11/6/2015	138.72	\$1,171.12	\$0.00
22421	11/13/2015	109130	Dacayanan	Liza	9/1/2013	10/24/2015	11/6/2015	98.58	\$1,067.02	\$0.00
22422	11/13/2015	23948	Daffron	Daniel	6/1/2013	10/24/2015	11/6/2015	61.53	\$638.29	\$0.00
22423	11/13/2015	110936	Daniels	James	7/1/2013	10/24/2015	11/6/2015	115.21	\$1,377.15	\$0.00
22424	11/13/2015	111137	Dejacto	Giovanna	10/1/2013	10/24/2015	11/6/2015	137.82	\$1,386.77	\$0.00
22425	11/13/2015	112508	Demick Jr.	William	3/1/2015	10/24/2015	11/6/2015	110.42	\$881.43	\$0.00
22426	11/13/2015	3936	Dial	Donald	3/1/2013	10/24/2015	11/6/2015	55.46	\$473.14	\$0.00
22427	11/13/2015	111351	Diomande	Almamy	6/1/2015	10/24/2015	11/6/2015	110.89	\$1,239.12	\$0.00
22428	11/13/2015	3756	Disbrow	Ronald	1/1/2012	10/24/2015	11/6/2015	57.29	\$446.49	\$0.00
22429	11/13/2015	3395	Dixon	Julius	11/1/2010	10/24/2015	11/6/2015	122.54	\$1,642.65	\$0.00
22430	11/13/2015	114946	Dopson	Gary	1/1/2016	10/24/2015	11/6/2015	109.80	\$840.22	\$0.00
22431	11/13/2015	2006	Durtschi	Jeffrey	7/1/2008	10/24/2015	11/6/2015	127.11	\$1,471.19	\$0.00
22432	11/13/2015	112745	Ebert	Michael	12/1/2015	10/24/2015	11/6/2015	133.94	\$1,248.58	\$0.00
22433	11/13/2015	2637	Edwards	Jeffrey	7/1/2008	10/24/2015	11/6/2015	43.41	\$461.01	\$0.00
22434	11/13/2015	3595	Ekoue	Ayi	10/1/2011	10/24/2015	11/6/2015	115.02	\$1,014.76	\$0.00
22435	11/13/2015	109641	Emling	Paul	8/1/2012	10/24/2015	11/6/2015	58.87	\$709.38	\$0.00
22436	11/13/2015	108744	Esparza	Francisco	4/1/2015	10/24/2015	11/6/2015	84.05	\$753.11	\$0.00
22438	11/13/2015	112418	Faye	Pape	11/1/2015	10/24/2015	11/6/2015	125.11	\$1,210.80	\$0.00
22439	11/13/2015	104153	Feller	Anthony	12/1/2015	10/24/2015	11/6/2015	111.81	\$889.93	\$0.00
22440	11/13/2015	108011	Fernandez-Le	Alexander	6/1/2015	10/24/2015	11/6/2015	87.44	\$1,192.96	\$0.00
22441	11/13/2015	3549	Fesehazion	Teabe	7/1/2011	10/24/2015	11/6/2015	88.18	\$862.72	\$0.00
22442	11/13/2015	109381	Fitzsimmons	Marc	8/1/2014	10/24/2015	11/6/2015	75.33	\$663.04	\$0.00
22443	11/13/2015	30616	Flores	Abner	10/1/2014	10/24/2015	11/6/2015	111.65	\$1,166.07	\$0.00
22444	11/13/2015	114873	Flournoy	Carr	12/1/2015	10/24/2015	11/6/2015	102.73	\$761.84	\$0.00
22445	11/13/2015	25493	Fragoza	Michael	5/1/2015	10/24/2015	11/6/2015	57.95	\$561.28	\$0.00
22446	11/13/2015	24791	Garcia	Anthony	6/1/2013	10/24/2015	11/6/2015	85.45	\$858.89	\$0.00
22447	11/13/2015	2782	Garcia	John	7/1/2008	10/24/2015	11/6/2015	109.66	\$950.07	\$0.00
22448	11/13/2015	111531	Gay	Phillip	8/1/2015	10/24/2015	11/6/2015	94.73	\$747.84	\$0.00
22449	11/13/2015	113914	Gazzara	Anthony	4/1/2015	10/24/2015	11/6/2015	96.23	\$844.21	\$0.00
22450	11/13/2015	29297	Gebremichea	Yohannes	9/1/2014	10/24/2015	11/6/2015	56.60	\$448.75	\$0.00
22451	11/13/2015	3696	Gillett	David	5/1/2012	10/24/2015	11/6/2015	40.72	\$372.19	\$0.00
22452	11/13/2015	114601	Godfrey	Brenda	10/1/2015	10/24/2015	11/6/2015	84.37	\$785.74	\$0.00

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22453	11/13/2015	106897	Goettsche	Dale	6/1/2013	10/24/2015	11/6/2015	67.41	\$631.09	\$0.00
22454	11/13/2015	115000	Goree	Latia	1/1/2016	10/24/2015	11/6/2015	83.61	\$626.40	\$0.00
22455	11/13/2015	102141	Gray	Charles	1/1/2016	10/24/2015	11/6/2015	75.38	\$840.49	\$0.00
22456	11/13/2015	19253	Gray	Gary	4/1/2012	10/24/2015	11/6/2015	66.65	\$637.61	\$0.00
22376	11/13/2015	111916	Gray	Kenneth	12/1/2015	10/24/2015	11/6/2015	104.44	\$788.42	\$0.00
22457	11/13/2015	102800	Habte	Micheal	10/1/2015	10/24/2015	11/6/2015	97.85	\$1,048.97	\$0.00
22458	11/13/2015	21446	Handlon	Michael	6/1/2013	10/24/2015	11/6/2015	88.63	\$1,036.22	\$0.00
22459	11/13/2015	3402	Hansen	Jordan	11/1/2010	10/24/2015	11/6/2015	122.33	\$1,074.96	\$0.00
22460	11/13/2015	3855	Harris	Dennis	6/1/2012	10/24/2015	11/6/2015	98.88	\$999.73	\$0.00
22461	11/13/2015	19800	Hasbrouck Jr	Ronald	9/1/2015	10/24/2015	11/6/2015	109.80	\$1,207.35	\$0.00
22462	11/13/2015	112912	Hassanzadeh	Davoud	11/1/2014	10/24/2015	11/6/2015	66.16	\$882.34	\$0.00
22463	11/13/2015	102378	Hatch Jr.	Frank	4/1/2015	10/24/2015	11/6/2015	39.13	\$352.63	\$0.00
22464	11/13/2015	115043	Hawkins	Devin	1/1/2016	10/24/2015	11/6/2015	9.86	\$71.47	\$0.02
22465	11/13/2015	114928	Herrlich	Curt	1/1/2016	10/24/2015	11/6/2015	86.67	\$676.08	\$0.00
22466	11/13/2015	2097	Hinks	Dana	7/1/2008	10/24/2015	11/6/2015	109.13	\$1,036.94	\$0.00
22467	11/13/2015	32082	Hoffman	Gary	4/1/2009	10/31/2015	11/6/2015	65.35	\$527.88	\$0.00
22469	11/13/2015	2751	Hurtado	Hubert	7/1/2008	10/24/2015	11/6/2015	77.45	\$681.81	\$0.00
22470	11/13/2015	3187	Isaac	Edsel	10/1/2009	10/24/2015	11/6/2015	61.58	\$638.12	\$0.00
22472	11/13/2015	107992	Jacobi	Donald	8/1/2013	10/24/2015	11/6/2015	115.72	\$1,051.10	\$0.00
22473	11/13/2015	3020	Jarmosco	John	3/1/2009	10/24/2015	11/6/2015	99.83	\$1,312.55	\$0.00
22474	11/13/2015	15638	Jawaid	Shaikh	11/1/2015	10/24/2015	11/6/2015	83.64	\$766.34	\$0.00
22475	11/13/2015	28842	Jimerson-Ces	Jo A	8/1/2015	10/24/2015	11/6/2015	72.62	\$682.91	\$0.00
22476	11/13/2015	29542	Kang	Chong	8/1/2009	10/24/2015	11/6/2015	83.81	\$941.90	\$0.00
22477	11/13/2015	106153	Keller	Roger	7/1/2013	10/24/2015	11/6/2015	78.13	\$643.16	\$0.00
22478	11/13/2015	2736	Kenary	Brian	7/1/2008	10/24/2015	11/6/2015	29.72	\$258.67	\$0.00
22479	11/13/2015	27999	Khan	Zia-Ur-Rehma	7/1/2015	10/24/2015	11/6/2015	101.93	\$774.65	\$0.00
22480	11/13/2015	107692	Kim	Chang	5/1/2015	10/24/2015	11/6/2015	107.25	\$1,289.20	\$0.00
22482	11/13/2015	3893	Klein	Phillip	11/1/2012	10/24/2015	11/6/2015	81.24	\$734.53	\$0.00
22483	11/13/2015	114375	Ko	Kuen	12/1/2015	10/24/2015	11/6/2015	119.71	\$1,197.43	\$0.00
22484	11/13/2015	3630	Kogan	Martin	1/1/2012	10/24/2015	11/6/2015	58.02	\$596.82	\$0.00
22485	11/13/2015	105627	Kronenberg	Arthur	4/1/2015	10/24/2015	11/6/2015	88.00	\$686.92	\$0.00
22486	11/13/2015	103826	Kull Jr.	William	6/1/2014	10/24/2015	11/6/2015	76.65	\$932.69	\$0.00
22487	11/13/2015	107625	Lafarge	Jeannine	7/1/2014	10/24/2015	11/6/2015	104.37	\$1,567.88	\$0.00
22488	11/13/2015	114766	Laughinghouse	Charles	11/1/2015	10/24/2015	11/6/2015	92.68	\$792.64	\$0.00
22489	11/13/2015	111290	Lay	Gilbert	7/1/2014	10/24/2015	11/6/2015	81.64	\$878.59	\$0.00
22491	11/13/2015	3685	Leal	Jill	5/1/2012	10/24/2015	11/6/2015	95.97	\$1,118.19	\$0.00
22492	11/13/2015	108034	Leonardi	Kevin	11/1/2015	10/24/2015	11/6/2015	79.25	\$819.78	\$0.00
22493	11/13/2015	15804	Little	Dennis	12/1/2011	10/24/2015	11/6/2015	85.99	\$798.06	\$0.00
22494	11/13/2015	18903	Lozada	Giovanni	8/1/2015	10/31/2015	11/6/2015	119.46	\$1,498.41	\$0.00
22495	11/13/2015	3778	Macato	Jaime	1/1/2012	10/24/2015	11/6/2015	78.07	\$695.42	\$0.00
22496	11/13/2015	18640	Mahtani	Ratan	7/1/2015	10/24/2015	11/6/2015	54.04	\$473.69	\$0.00
22497	11/13/2015	100830	Mahyar	Yamine	1/1/2016	10/24/2015	11/6/2015	108.85	\$1,155.97	\$0.00
22498	11/13/2015	2757	Majors	John	7/1/2008	10/24/2015	11/6/2015	72.05	\$613.10	\$0.00
22499	11/13/2015	3583	Maras	Maria	10/1/2011	10/24/2015	11/6/2015	98.24	\$1,169.33	\$0.00
22500	11/13/2015	110053	Martinez	Francisco	8/1/2013	10/24/2015	11/6/2015	36.77	\$388.19	\$0.00
22616	11/13/2015	110618	Mastrio	Pamela	5/1/2014	10/24/2015	11/6/2015	86.66	\$628.21	\$0.07
22502	11/13/2015	110395	Maxwell	Charles	11/1/2015	10/24/2015	11/6/2015	55.59	\$403.22	\$0.00
22503	11/13/2015	2587	McCarter	Patrick	7/1/2008	10/24/2015	11/6/2015	87.36	\$769.36	\$0.00
22504	11/13/2015	113696	McGinn	Randall	11/1/2015	10/24/2015	11/6/2015	46.23	\$407.18	\$0.00
22505	11/13/2015	25641	McSkimming	John	5/1/2014	10/24/2015	11/6/2015	71.85	\$686.70	\$0.00
22506	11/13/2015	101698	Mecke	Robert	1/1/2016	10/24/2015	11/6/2015	114.91	\$833.64	\$0.00
22507	11/13/2015	29265	Micu	Emilio	9/1/2014	10/24/2015	11/6/2015	88.81	\$978.98	\$0.00
22508	11/13/2015	114922	Middleton	Shawn	12/1/2015	10/24/2015	11/6/2015	101.82	\$781.86	\$0.00
22509	11/13/2015	30196	Miller	Jason	11/1/2013	10/24/2015	11/6/2015	77.29	\$813.66	\$0.00

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22510	11/13/2015	112009	Mock	Karen	10/1/2014	10/24/2015	11/6/2015	100.44	\$1,166.72	\$0.00
22511	11/13/2015	101935	Mohamed	Hamza	9/1/2014	10/24/2015	11/6/2015	110.32	\$1,552.65	\$0.00
22512	11/13/2015	105284	Monforte II	Peter	1/1/2012	10/24/2015	11/6/2015	109.09	\$881.84	\$0.00
22513	11/13/2015	3664	Moreno	James	3/1/2012	10/24/2015	11/6/2015	111.95	\$838.62	\$0.00
22514	11/13/2015	112561	Morgan	Sherryl	2/1/2015	10/24/2015	11/6/2015	80.81	\$719.48	\$0.00
22515	11/13/2015	8321	Morris	Thomas	1/1/2012	10/24/2015	11/6/2015	79.87	\$706.92	\$0.00
22516	11/13/2015	107704	Muhtari	Abdulrahman	2/1/2013	10/24/2015	11/6/2015	107.94	\$1,254.30	\$0.00
22517	11/13/2015	109569	Munoz-Ferna	Ariel	12/1/2015	10/24/2015	11/6/2015	50.74	\$367.75	\$0.12
22518	11/13/2015	3847	Murawski	Richard	6/1/2012	10/24/2015	11/6/2015	96.89	\$1,217.10	\$0.00
22519	11/13/2015	113865	Nelson	Jack	1/1/2016	10/24/2015	11/6/2015	79.13	\$723.41	\$0.00
22521	11/13/2015	30295	Ogbazghi	Dawit	11/1/2011	10/24/2015	11/6/2015	23.51	\$243.34	\$0.00
22522	11/13/2015	27001	Olson	David	10/1/2015	10/24/2015	11/6/2015	80.58	\$642.53	\$0.00
22523	11/13/2015	3868	Olson	Eric	8/1/2012	10/24/2015	11/6/2015	113.65	\$1,223.14	\$0.00
22524	11/13/2015	107567	Ordaz	Guillermo	7/1/2015	10/24/2015	11/6/2015	86.85	\$715.13	\$0.00
22525	11/13/2015	3717	Ozgulgec	Tunc	10/1/2011	10/24/2015	11/6/2015	59.86	\$629.24	\$0.00
22526	11/13/2015	110552	Padilla	Rosemarie	5/1/2015	10/24/2015	11/6/2015	60.79	\$471.27	\$0.00
22527	11/13/2015	31283	Pak	Sam	7/1/2008	10/24/2015	11/6/2015	108.22	\$1,458.40	\$0.00
22528	11/13/2015	22498	Paris	John	1/1/2016	10/24/2015	11/6/2015	8.10	\$58.74	\$0.00
22529	11/13/2015	112670	Parry	Keith	9/1/2014	10/24/2015	11/6/2015	95.74	\$987.14	\$0.00
22530	11/13/2015	3806	Pearson	Jon	4/1/2012	10/24/2015	11/6/2015	87.96	\$878.68	\$0.00
22532	11/13/2015	15968	Peterson	Kenneth	1/1/2009	10/24/2015	11/6/2015	128.37	\$1,524.58	\$0.00
22533	11/13/2015	1076	Peterson	Steven	7/1/2008	10/24/2015	11/6/2015	89.20	\$781.70	\$0.00
22534	11/13/2015	106089	Phillips	Larry	11/1/2013	10/24/2015	11/6/2015	107.91	\$1,129.54	\$0.00
22535	11/13/2015	2826	Pitts	Amir	7/1/2008	10/24/2015	11/6/2015	101.46	\$1,198.55	\$0.00
22536	11/13/2015	112342	Pizzimenti	Santo	5/1/2015	10/24/2015	11/6/2015	87.33	\$852.49	\$0.00
22537	11/13/2015	26679	Polchinski	Paul	9/1/2014	10/24/2015	11/6/2015	55.22	\$571.15	\$0.00
22538	11/13/2015	106825	Preza	Rowena	4/1/2015	10/24/2015	11/6/2015	81.39	\$775.83	\$0.00
22539	11/13/2015	109845	Pruitt	Charles	6/1/2015	10/24/2015	11/6/2015	117.85	\$1,010.26	\$0.00
22541	11/13/2015	23178	Raffensperger	Jeffrey	5/1/2014	10/24/2015	11/6/2015	139.57	\$1,553.50	\$0.00
22542	11/13/2015	113507	Ramirez-Ram	Omar	10/1/2015	10/24/2015	11/6/2015	109.46	\$1,307.25	\$0.00
22543	11/13/2015	3812	Ray	William	4/1/2012	10/24/2015	11/6/2015	88.04	\$961.29	\$0.00
22545	11/13/2015	2237	Relopez	Craig	7/1/2008	10/24/2015	11/6/2015	84.10	\$699.93	\$0.00
22546	11/13/2015	113964	Rezaei	Ryan	5/1/2015	10/24/2015	11/6/2015	34.06	\$358.58	\$0.00
22547	11/13/2015	113948	Riazi	Sayedmoham	5/1/2015	10/24/2015	11/6/2015	102.87	\$1,050.21	\$0.00
22548	11/13/2015	14261	Riipi	Karl	12/1/2013	10/24/2015	11/6/2015	79.30	\$878.80	\$0.00
22549	11/13/2015	111648	Robinson	Jeffrey	11/1/2014	10/24/2015	11/6/2015	83.07	\$798.37	\$0.00
22550	11/13/2015	104171	Robinson	Mikalani	5/1/2014	10/24/2015	11/6/2015	63.60	\$465.54	\$0.00
22551	11/13/2015	114033	Rodde	Thomas	5/1/2015	10/24/2015	11/6/2015	93.32	\$834.09	\$0.00
22552	11/13/2015	3814	Rohlas	Polly	4/1/2012	10/24/2015	11/6/2015	69.72	\$611.39	\$0.00
22553	11/13/2015	114618	Romero	James	1/1/2016	10/24/2015	11/6/2015	82.94	\$601.65	\$0.00
22555	11/13/2015	111078	Ross	Sherman	7/1/2015	10/24/2015	11/6/2015	92.87	\$881.98	\$0.00
22556	11/13/2015	112826	Sameh	Abdul	11/1/2014	10/24/2015	11/6/2015	107.06	\$1,287.21	\$0.00
22557	11/13/2015	29249	Sameni	Abbas	9/1/2014	10/24/2015	11/6/2015	99.11	\$994.05	\$0.00
22558	11/13/2015	108213	Savino	Christopher	5/1/2015	10/24/2015	11/6/2015	88.12	\$750.56	\$0.00
22559	11/13/2015	105273	Sayed	Jamil	6/1/2012	10/24/2015	11/6/2015	97.52	\$961.71	\$0.00
22560	11/13/2015	25981	Schroeder	William	11/1/2008	10/24/2015	11/6/2015	109.10	\$995.73	\$0.00
22561	11/13/2015	3359	Sevillet	Otto	8/1/2010	10/24/2015	11/6/2015	82.60	\$716.78	\$0.00
22562	11/13/2015	112766	Sibre	Christopher	8/1/2014	10/24/2015	11/6/2015	91.80	\$1,156.03	\$0.00
22563	11/13/2015	23388	Simmons	John	7/1/2008	10/24/2015	11/6/2015	70.64	\$876.18	\$0.00
22564	11/13/2015	106103	Smallwood	Linn	4/1/2015	10/24/2015	11/6/2015	77.91	\$586.22	\$0.00
22565	11/13/2015	112181	Smith	Alex	6/1/2015	10/24/2015	11/6/2015	42.71	\$442.79	\$0.00
22540	11/13/2015	110015	Smith	Donna	11/1/2015	10/24/2015	11/6/2015	138.44	\$1,327.06	\$0.00
22567	11/13/2015	108547	Solano	Domingo	9/1/2015	10/24/2015	11/6/2015	99.19	\$1,140.73	\$0.00
22568	11/13/2015	2638	Soto	Jacob	7/1/2008	10/24/2015	11/6/2015	101.37	\$1,003.75	\$0.00

Check Number	Payroll Check Date	Payroll Records Employee Account Number	Last Name	First Name	Date Became Qualified for Health Insurance	Pay Period Start Date	Pay Period End Date	Hours for Pay Period From Payroll Records	Total Wages Paid	Minimum Wages Owed at \$7.25 an Hour for all Hours
22569	11/13/2015	3757	Steck	Gregory	1/1/2012	10/24/2015	11/6/2015	94.58	\$870.07	\$0.00
22570	11/13/2015	3872	Stockton	Clarence	8/1/2012	10/24/2015	11/6/2015	114.22	\$1,076.15	\$0.00
22571	11/13/2015	104248	Suddarth	Robert	1/1/2016	10/24/2015	11/6/2015	66.38	\$765.55	\$0.00
22572	11/13/2015	25450	Tafesh	George	3/1/2009	10/24/2015	11/6/2015	53.21	\$471.69	\$0.00
22351	11/13/2015	112063	Tapia-Vergar	Agustin	5/1/2014	10/24/2015	11/6/2015	65.64	\$588.61	\$0.00
22573	11/13/2015	109384	Tarango	Jose	12/1/2015	10/24/2015	11/6/2015	110.69	\$1,160.20	\$0.00
22574	11/13/2015	109745	Taylor	David	12/1/2013	10/24/2015	11/6/2015	64.15	\$675.44	\$0.00
22575	11/13/2015	111463	Taylor	Fredrick	8/1/2015	10/24/2015	11/6/2015	96.65	\$750.88	\$0.00
22576	11/13/2015	102232	Thetprasit	Lou	2/1/2015	10/24/2015	11/6/2015	98.55	\$1,238.30	\$0.00
22577	11/13/2015	23143	Thomas	Marc	5/1/2015	10/24/2015	11/6/2015	90.40	\$899.77	\$0.00
22578	11/13/2015	3867	Thompson	Glen	8/1/2012	10/24/2015	11/6/2015	28.35	\$235.38	\$0.00
22579	11/13/2015	27963	Thompson	Michael	11/1/2011	10/24/2015	11/6/2015	85.60	\$721.74	\$0.00
22580	11/13/2015	114361	Toledano	Alexis	11/1/2015	10/24/2015	11/6/2015	104.80	\$988.20	\$0.00
22352	11/13/2015	104747	Trumpp	Robert	9/1/2014	10/24/2015	11/6/2015	50.35	\$364.86	\$0.18
22581	11/13/2015	20386	Tucker	Carl	6/1/2009	10/24/2015	11/6/2015	33.13	\$330.45	\$0.00
22582	11/13/2015	22597	Turner	James	10/1/2015	10/24/2015	11/6/2015	110.69	\$1,102.25	\$0.00
22583	11/13/2015	110836	Uba	Chima	8/1/2014	10/24/2015	11/6/2015	40.19	\$414.03	\$0.00
22584	11/13/2015	111338	Valiente	Pedro	5/1/2015	10/24/2015	11/6/2015	99.03	\$914.53	\$0.00
22585	11/13/2015	113920	Vargo	Keli	4/1/2015	10/24/2015	11/6/2015	69.54	\$637.30	\$0.00
22586	11/13/2015	104958	Volchek	Boris	2/1/2015	10/24/2015	11/6/2015	71.30	\$817.54	\$0.00
22587	11/13/2015	3796	Vongthep	Christopher	3/1/2012	10/24/2015	11/6/2015	104.32	\$1,066.95	\$0.00
22588	11/13/2015	3058	Wallace	James	5/1/2009	10/24/2015	11/6/2015	64.13	\$704.24	\$0.00
22589	11/13/2015	3820	Wallace	Roy	5/1/2012	10/24/2015	11/6/2015	85.04	\$616.74	\$0.00
22590	11/13/2015	100619	Walls	Charles	7/1/2015	10/24/2015	11/6/2015	56.59	\$455.96	\$0.00
22591	11/13/2015	113891	Washington	Kenneth	5/1/2015	10/24/2015	11/6/2015	107.12	\$777.15	\$0.00
22592	11/13/2015	3496	Weaver	Gerie	4/1/2011	10/24/2015	11/6/2015	79.74	\$697.90	\$0.00
22593	11/13/2015	2785	Welborn	Paul	5/1/2012	10/24/2015	11/6/2015	71.23	\$805.37	\$0.00
22594	11/13/2015	113682	Wible	Gregory	8/1/2015	10/24/2015	11/6/2015	46.80	\$372.37	\$0.00
22595	11/13/2015	113240	Woldemichal	Meles	11/1/2015	10/24/2015	11/6/2015	143.24	\$1,904.05	\$0.00
22596	11/13/2015	110866	Wolfe	Thomas	8/1/2013	10/24/2015	11/6/2015	74.37	\$778.28	\$0.00
22597	11/13/2015	3910	Wong	Jorge	1/1/2013	10/24/2015	11/6/2015	66.35	\$608.97	\$0.00
22599	11/13/2015	3092	Yabut	Gerry	6/1/2009	10/24/2015	11/6/2015	109.60	\$1,116.79	\$0.00
22600	11/13/2015	114275	Yerima	Mollah	7/1/2015	10/24/2015	11/6/2015	98.15	\$1,017.50	\$0.00
22601	11/13/2015	113075	Yu	Mary	9/1/2015	10/24/2015	11/6/2015	116.57	\$910.98	\$0.00
22602	11/13/2015	30374	Zafar	John	6/1/2010	10/24/2015	11/6/2015	92.62	\$1,176.26	\$0.00
22603	11/13/2015	114189	Zaldivar	Maikel	11/1/2015	10/24/2015	11/6/2015	76.54	\$808.11	\$0.00
22604	11/13/2015	2273	Zawoudie	Masfen	7/1/2008	10/24/2015	11/6/2015	69.09	\$744.09	\$0.00
22605	11/13/2015	111519	Zghaier	Hassan	11/1/2015	10/24/2015	11/6/2015	92.20	\$807.75	\$0.00
22673	11/27/2015	112948	Abdalla	Mustafa	5/1/2015	11/7/2015	11/20/2015	99.01	\$1,046.06	\$0.00
22674	11/27/2015	2640	Abuel	Alan	7/1/2008	11/7/2015	11/20/2015	76.07	\$883.41	\$0.00
22675	11/27/2015	100221	Ackman	Charles	4/1/2013	11/7/2015	11/20/2015	51.29	\$542.42	\$0.00
22676	11/27/2015	109164	Alardi	Steven	1/1/2016	11/7/2015	11/20/2015	96.12	\$986.65	\$0.00
22678	11/27/2015	24802	Altamirano	Keith	10/1/2014	11/7/2015	11/20/2015	17.80	\$229.00	\$0.00
22679	11/27/2015	103822	Alvarado	Santiago	9/1/2014	11/7/2015	11/20/2015	111.14	\$1,045.76	\$0.00
22680	11/27/2015	29709	Andersen	Jason	5/1/2009	11/7/2015	11/20/2015	76.84	\$609.39	\$0.00
22681	11/27/2015	106828	Anderson	Calvin	2/1/2013	11/7/2015	11/20/2015	86.92	\$875.55	\$0.00
22682	11/27/2015	114697	Anderson	Neal	10/1/2015	11/7/2015	11/20/2015	99.13	\$928.67	\$0.00
22683	11/27/2015	3650	Anif	Janeid	3/1/2012	11/7/2015	11/20/2015	85.59	\$1,112.52	\$0.00
22684	11/27/2015	114669	Anon	Nelson	10/1/2015	11/7/2015	11/20/2015	86.81	\$725.78	\$0.00
22685	11/27/2015	106151	Apodaca	Orlando	7/1/2015	11/7/2015	11/20/2015	123.33	\$1,025.09	\$0.00
22686	11/27/2015	3730	Arar	Isam	10/1/2011	11/7/2015	11/20/2015	61.44	\$608.50	\$0.00
22687	11/27/2015	26553	Arnwine	Howard	4/1/2012	11/7/2015	11/20/2015	87.19	\$824.42	\$0.00
22688	11/27/2015	113714	Arrandt	Robert	12/1/2015	11/7/2015	11/20/2015	112.37	\$899.98	\$0.00
22689	11/27/2015	113763	Arroyo	Carlos	10/1/2015	11/7/2015	11/20/2015	114.06	\$1,248.64	\$0.00

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22690	11/27/2015	114195	Arzola	Juan	6/1/2015	11/7/2015	11/20/2015	140.28	\$2,095.38	\$0.00
22691	11/27/2015	103560	Awad	Edward	10/1/2015	11/7/2015	11/20/2015	91.90	\$852.48	\$0.00
22692	11/27/2015	114706	Bagley	Shaun	2/1/2016	11/7/2015	11/20/2015	23.97	\$173.71	\$0.07
22693	11/27/2015	113134	Baker	Jason	1/1/2016	11/7/2015	11/20/2015	78.72	\$738.51	\$0.00
22694	11/27/2015	112015	Bambenek	Matthew	3/1/2014	11/7/2015	11/20/2015	59.64	\$746.67	\$0.00
22695	11/27/2015	112978	Bancod	Michael	3/1/2015	11/7/2015	11/20/2015	64.60	\$660.72	\$0.00
22696	11/27/2015	100158	Barnes	Benjamin	9/1/2011	11/7/2015	11/20/2015	48.68	\$440.75	\$0.00
22697	11/27/2015	16654	Barnhart	John	7/1/2015	11/7/2015	11/20/2015	105.61	\$1,328.24	\$0.00
22698	11/27/2015	26073	Barnola	Rafael	1/1/2016	11/7/2015	11/20/2015	77.89	\$713.74	\$0.00
22699	11/27/2015	113542	Basoalto-San	Lucia	9/1/2015	11/7/2015	11/20/2015	103.41	\$1,287.34	\$0.00
22700	11/27/2015	2454	Batista	Eugenio	7/1/2008	11/7/2015	11/20/2015	68.13	\$755.53	\$0.00
22701	11/27/2015	100286	Bedane	Belay	3/1/2015	11/7/2015	11/20/2015	88.59	\$827.96	\$0.00
22702	11/27/2015	110687	Berger	James	5/1/2014	11/7/2015	11/20/2015	89.11	\$989.14	\$0.00
22703	11/27/2015	112830	Bestard-Sanc	Vladimir	12/1/2015	11/7/2015	11/20/2015	71.26	\$516.41	\$0.23
22704	11/27/2015	23373	Bey	Ronald	4/1/2009	11/7/2015	11/20/2015	43.38	\$485.26	\$0.00
22705	11/27/2015	3581	Borges	Antonio	9/1/2011	11/7/2015	11/20/2015	88.94	\$1,096.79	\$0.00
22706	11/27/2015	101034	Bower	Terry	3/1/2015	11/7/2015	11/20/2015	88.43	\$1,041.52	\$0.00
22708	11/27/2015	3949	Brown	Daniel	4/1/2013	11/7/2015	11/20/2015	32.51	\$1,126.38	\$0.00
22709	11/27/2015	107492	Brown	Jimmy	9/1/2014	11/7/2015	11/20/2015	102.98	\$1,005.72	\$0.00
22710	11/27/2015	106463	Capone	Gary	2/1/2014	11/7/2015	11/20/2015	91.99	\$1,013.27	\$0.00
22711	11/27/2015	2660	Carracedo	Sonny	7/1/2008	11/7/2015	11/20/2015	96.41	\$1,098.48	\$0.00
22712	11/27/2015	3899	Casiello	Anthony	12/1/2012	11/7/2015	11/20/2015	100.24	\$951.91	\$0.00
22713	11/27/2015	103777	Castro-Jaen	Lazaro	12/1/2015	11/7/2015	11/20/2015	10.89	\$125.06	\$0.00
22714	11/27/2015	21398	Chenpanas	Surapan	11/1/2015	11/7/2015	11/20/2015	95.13	\$937.89	\$0.00
22715	11/27/2015	29301	Cicerchi	Michael	12/1/2015	11/7/2015	11/20/2015	112.74	\$1,224.66	\$0.00
22716	11/27/2015	106890	Co	Pedro	11/1/2015	11/7/2015	11/20/2015	77.32	\$586.33	\$0.00
22717	11/27/2015	2051	Costello	Brad	7/1/2008	11/7/2015	11/20/2015	93.91	\$967.12	\$0.00
22718	11/27/2015	15756	Craddock	Mason	12/1/2015	11/7/2015	11/20/2015	62.37	\$452.12	\$0.06
22719	11/27/2015	112510	Crawford	Dustin	10/1/2015	11/7/2015	11/20/2015	58.95	\$427.36	\$0.03
22720	11/27/2015	109796	Curtin	Ronald	7/1/2013	11/7/2015	11/20/2015	72.78	\$687.17	\$0.00
22721	11/27/2015	112564	Cyiark	Billy	9/1/2015	11/7/2015	11/20/2015	138.10	\$1,154.41	\$0.00
22722	11/27/2015	109130	Dacayanan	Liza	9/1/2013	11/7/2015	11/20/2015	108.64	\$1,215.01	\$0.00
22723	11/27/2015	23948	Daffron	Daniel	6/1/2013	11/7/2015	11/20/2015	62.36	\$672.35	\$0.00
22724	11/27/2015	110936	Daniels	James	7/1/2013	11/7/2015	11/20/2015	95.20	\$1,028.83	\$0.00
22725	11/27/2015	111137	Dejacto	Giovanna	10/1/2013	11/7/2015	11/20/2015	124.14	\$1,348.86	\$0.00
22726	11/27/2015	112508	Demick Jr.	William	3/1/2015	11/7/2015	11/20/2015	108.94	\$975.58	\$0.00
22727	11/27/2015	3936	Dial	Donald	3/1/2013	11/7/2015	11/20/2015	76.32	\$656.97	\$0.00
22728	11/27/2015	111351	Diomande	Almamy	6/1/2015	11/7/2015	11/20/2015	75.91	\$872.79	\$0.00
22729	11/27/2015	3756	Disbrow	Ronald	1/1/2012	11/7/2015	11/20/2015	58.20	\$495.44	\$0.00
22730	11/27/2015	3395	Dixon	Julius	11/1/2010	11/7/2015	11/20/2015	112.90	\$1,387.86	\$0.00
22731	11/27/2015	114946	Dopson	Gary	1/1/2016	11/7/2015	11/20/2015	110.82	\$1,011.53	\$0.00
22732	11/27/2015	2006	Durtschi	Jeffrey	7/1/2008	11/7/2015	11/20/2015	113.41	\$1,423.33	\$0.00
22733	11/27/2015	115072	Dutton	Dionne	2/1/2016	11/7/2015	11/20/2015	35.38	\$271.44	\$0.00
22734	11/27/2015	112745	Ebert	Michael	12/1/2015	11/7/2015	11/20/2015	105.72	\$1,046.79	\$0.00
22735	11/27/2015	2637	Edwards	Jeffrey	7/1/2008	11/7/2015	11/20/2015	65.65	\$634.38	\$0.00
22736	11/27/2015	3595	Ekoue	Ayi	10/1/2011	11/7/2015	11/20/2015	84.25	\$824.20	\$0.00
22737	11/27/2015	109641	Emling	Paul	8/1/2012	11/7/2015	11/20/2015	55.70	\$742.26	\$0.00
22738	11/27/2015	108744	Esparza	Francisco	4/1/2015	11/7/2015	11/20/2015	105.14	\$944.79	\$0.00
22740	11/27/2015	112418	Faye	Pape	11/1/2015	11/7/2015	11/20/2015	84.09	\$961.84	\$0.00
22741	11/27/2015	104153	Feller	Anthony	12/1/2015	11/7/2015	11/20/2015	111.90	\$829.57	\$0.00
22742	11/27/2015	108011	Fernandez-Le	Alexander	6/1/2015	11/7/2015	11/20/2015	67.32	\$807.89	\$0.00
22743	11/27/2015	3549	Fesehazion	Teabe	7/1/2011	11/7/2015	11/20/2015	77.22	\$838.06	\$0.00
22744	11/27/2015	109381	Fitzsimmons	Marc	8/1/2014	11/7/2015	11/20/2015	85.38	\$732.34	\$0.00
22745	11/27/2015	30616	Flores	Abner	10/1/2014	11/7/2015	11/20/2015	109.92	\$909.41	\$0.00

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22746	11/27/2015	114873	Flournoy	Carr	12/1/2015	11/7/2015	11/20/2015	122.20	\$956.72	\$0.00
22747	11/27/2015	25493	Fragoza	Michael	5/1/2015	11/7/2015	11/20/2015	45.60	\$500.20	\$0.00
22748	11/27/2015	24791	Garcia	Anthony	6/1/2013	11/7/2015	11/20/2015	77.20	\$743.41	\$0.00
22749	11/27/2015	2782	Garcia	John	7/1/2008	11/7/2015	11/20/2015	100.08	\$924.55	\$0.00
22750	11/27/2015	111531	Gay	Phillip	8/1/2015	11/7/2015	11/20/2015	95.41	\$852.09	\$0.00
22751	11/27/2015	113914	Gazzara	Anthony	4/1/2015	11/7/2015	11/20/2015	105.08	\$884.23	\$0.00
22752	11/27/2015	29297	Gebremichea	Yohannes	9/1/2014	11/7/2015	11/20/2015	70.61	\$690.51	\$0.00
22753	11/27/2015	31780	Gilbert	David	8/1/2009	11/7/2015	11/20/2015	21.42	\$155.62	\$0.00
22754	11/27/2015	3696	Gillett	David	5/1/2012	11/7/2015	11/20/2015	20.05	\$213.64	\$0.00
22755	11/27/2015	114601	Godfrey	Brenda	10/1/2015	11/7/2015	11/20/2015	49.42	\$482.96	\$0.00
22756	11/27/2015	106897	Goettsche	Dale	6/1/2013	11/7/2015	11/20/2015	114.04	\$1,350.92	\$0.00
22757	11/27/2015	115000	Goree	Latia	1/1/2016	11/7/2015	11/20/2015	68.78	\$498.39	\$0.26
22758	11/27/2015	102141	Gray	Charles	1/1/2016	11/7/2015	11/20/2015	50.40	\$546.53	\$0.00
22759	11/27/2015	19253	Gray	Gary	4/1/2012	11/7/2015	11/20/2015	33.76	\$332.70	\$0.00
22677	11/27/2015	111916	Gray	Kenneth	12/1/2015	11/7/2015	11/20/2015	71.14	\$578.88	\$0.00
22760	11/27/2015	102800	Habte	Micheal	10/1/2015	11/7/2015	11/20/2015	110.64	\$1,427.33	\$0.00
22761	11/27/2015	16636	Hallowell	William	2/1/2016	11/7/2015	11/20/2015	32.31	\$270.32	\$0.00
22762	11/27/2015	21446	Handlon	Michael	6/1/2013	11/7/2015	11/20/2015	100.91	\$1,164.64	\$0.00
22763	11/27/2015	3402	Hansen	Jordan	11/1/2010	11/7/2015	11/20/2015	136.28	\$1,296.15	\$0.00
22764	11/27/2015	3855	Harris	Dennis	6/1/2012	11/7/2015	11/20/2015	96.59	\$934.07	\$0.00
22765	11/27/2015	115097	Harris	James	2/1/2016	11/7/2015	11/20/2015	21.51	\$232.02	\$0.00
22766	11/27/2015	19800	Hasbrouck Jr	Ronald	9/1/2015	11/7/2015	11/20/2015	106.28	\$1,140.89	\$0.00
22767	11/27/2015	112912	Hassanzadeh	Davoud	11/1/2014	11/7/2015	11/20/2015	72.83	\$809.06	\$0.00
22768	11/27/2015	102378	Hatch Jr.	Frank	4/1/2015	11/7/2015	11/20/2015	40.07	\$372.76	\$0.00
22769	11/27/2015	115043	Hawkins	Devin	1/1/2016	11/7/2015	11/20/2015	45.80	\$402.19	\$0.00
22770	11/27/2015	114928	Herrlich	Curt	1/1/2016	11/7/2015	11/20/2015	97.63	\$845.56	\$0.00
22771	11/27/2015	2097	Hinks	Dana	7/1/2008	11/7/2015	11/20/2015	107.03	\$1,089.41	\$0.00
22772	11/27/2015	32082	Hoffman	Gary	4/1/2009	11/14/2015	11/20/2015	89.02	\$667.89	\$0.00
22774	11/27/2015	2751	Hurtado	Hubert	7/1/2008	11/7/2015	11/20/2015	43.58	\$406.19	\$0.00
22775	11/27/2015	3187	Isaac	Edsel	10/1/2009	11/7/2015	11/20/2015	66.40	\$745.18	\$0.00
22777	11/27/2015	107992	Jacobi	Donald	8/1/2013	11/7/2015	11/20/2015	95.24	\$854.63	\$0.00
22778	11/27/2015	3020	Jarmosco	John	3/1/2009	11/7/2015	11/20/2015	95.46	\$1,513.78	\$0.00
22779	11/27/2015	15638	Jawaid	Shaikh	11/1/2015	11/7/2015	11/20/2015	84.37	\$732.63	\$0.00
22780	11/27/2015	28842	Jimerson-Ces	Jo A	8/1/2015	11/7/2015	11/20/2015	80.51	\$709.36	\$0.00
22781	11/27/2015	29542	Kang	Chong	8/1/2009	11/7/2015	11/20/2015	85.44	\$934.58	\$0.00
22782	11/27/2015	106153	Keller	Roger	7/1/2013	11/7/2015	11/20/2015	59.30	\$456.93	\$0.00
22783	11/27/2015	2736	Kenary	Brian	7/1/2008	11/7/2015	11/20/2015	51.60	\$514.03	\$0.00
22784	11/27/2015	27999	Khan	Zia-Ur-Rehma	7/1/2015	11/7/2015	11/20/2015	131.48	\$953.11	\$0.12
22785	11/27/2015	107692	Kim	Chang	5/1/2015	11/7/2015	11/20/2015	111.07	\$1,330.14	\$0.00
22787	11/27/2015	3893	Klein	Phillip	11/1/2012	11/7/2015	11/20/2015	82.73	\$762.59	\$0.00
22788	11/27/2015	114375	Ko	Kuen	12/1/2015	11/7/2015	11/20/2015	91.69	\$945.58	\$0.00
22789	11/27/2015	3630	Kogan	Martin	1/1/2012	11/7/2015	11/20/2015	58.03	\$611.21	\$0.00
22790	11/27/2015	105627	Kronenberg	Arthur	4/1/2015	11/7/2015	11/20/2015	61.24	\$475.73	\$0.00
22791	11/27/2015	103826	Kull Jr.	William	6/1/2014	11/7/2015	11/20/2015	49.26	\$572.39	\$0.00
22792	11/27/2015	107625	Lafarge	Jeannine	7/1/2014	11/7/2015	11/20/2015	90.84	\$1,357.35	\$0.00
22793	11/27/2015	114766	Laughinghou	Charles	11/1/2015	11/7/2015	11/20/2015	115.60	\$976.30	\$0.00
22794	11/27/2015	111290	Lay	Gilbert	7/1/2014	11/7/2015	11/20/2015	41.99	\$436.42	\$0.00
22796	11/27/2015	3685	Leal	Jill	5/1/2012	11/7/2015	11/20/2015	76.44	\$888.32	\$0.00
22797	11/27/2015	108034	Leonardi	Kevin	11/1/2015	11/7/2015	11/20/2015	64.60	\$698.43	\$0.00
22798	11/27/2015	15804	Little	Dennis	12/1/2011	11/7/2015	11/20/2015	85.11	\$878.16	\$0.00
22799	11/27/2015	18903	Lozada	Giovanni	8/1/2015	11/14/2015	11/20/2015	93.19	\$969.04	\$0.00
22800	11/27/2015	3778	Macato	Jaime	1/1/2012	11/7/2015	11/20/2015	100.51	\$1,159.18	\$0.00
22801	11/27/2015	18640	Mahtani	Ratan	7/1/2015	11/7/2015	11/20/2015	85.34	\$691.12	\$0.00
22802	11/27/2015	100830	Mahyar	Yamine	1/1/2016	11/7/2015	11/20/2015	74.62	\$794.68	\$0.00

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22803	11/27/2015	2757	Majors	John	7/1/2008	11/7/2015	11/20/2015	71.91	\$623.33	\$0.00
22804	11/27/2015	3583	Maras	Maria	10/1/2011	11/7/2015	11/20/2015	105.05	\$1,469.56	\$0.00
22805	11/27/2015	110053	Martinez	Francisco	8/1/2013	11/7/2015	11/20/2015	69.94	\$778.83	\$0.00
22806	11/27/2015	110618	Mastrio	Pamela	5/1/2014	11/7/2015	11/20/2015	83.97	\$829.17	\$0.00
22807	11/27/2015	110395	Maxwell	Charles	11/1/2015	11/7/2015	11/20/2015	52.64	\$381.50	\$0.14
22808	11/27/2015	103078	Mayer	Zygmund	2/1/2016	11/7/2015	11/20/2015	63.02	\$570.12	\$0.00
22809	11/27/2015	2587	McCarter	Patrick	7/1/2008	11/7/2015	11/20/2015	73.09	\$663.52	\$0.00
22810	11/27/2015	113696	McGinn	Randall	11/1/2015	11/7/2015	11/20/2015	45.33	\$396.55	\$0.00
22811	11/27/2015	25641	McSkimming	John	5/1/2014	11/7/2015	11/20/2015	88.89	\$890.37	\$0.00
22812	11/27/2015	101698	Mecke	Robert	1/1/2016	11/7/2015	11/20/2015	91.13	\$660.45	\$0.24
22813	11/27/2015	29265	Micu	Emilio	9/1/2014	11/7/2015	11/20/2015	102.58	\$1,223.30	\$0.00
22814	11/27/2015	114922	Middleton	Shawn	12/1/2015	11/7/2015	11/20/2015	101.84	\$783.24	\$0.00
22815	11/27/2015	30196	Miller	Jason	11/1/2013	11/7/2015	11/20/2015	69.47	\$835.78	\$0.00
22816	11/27/2015	112009	Mock	Karen	10/1/2014	11/7/2015	11/20/2015	105.46	\$1,373.96	\$0.00
22817	11/27/2015	101935	Mohamed	Hamza	9/1/2014	11/7/2015	11/20/2015	99.97	\$1,372.86	\$0.00
22818	11/27/2015	105284	Monforte II	Peter	1/1/2012	11/7/2015	11/20/2015	103.56	\$806.47	\$0.00
22819	11/27/2015	3664	Moreno	James	3/1/2012	11/7/2015	11/20/2015	116.01	\$840.54	\$0.53
22820	11/27/2015	112561	Morgan	Sherryl	2/1/2015	11/7/2015	11/20/2015	82.01	\$720.64	\$0.00
22821	11/27/2015	8321	Morris	Thomas	1/1/2012	11/7/2015	11/20/2015	70.78	\$654.71	\$0.00
22822	11/27/2015	107704	Muhtari	Abdulrahman	2/1/2013	11/7/2015	11/20/2015	92.58	\$1,098.09	\$0.00
22823	11/27/2015	109569	Munoz-Ferna	Ariel	12/1/2015	11/7/2015	11/20/2015	78.43	\$594.87	\$0.00
22824	11/27/2015	3847	Murawski	Richard	6/1/2012	11/7/2015	11/20/2015	78.12	\$1,066.28	\$0.00
22825	11/27/2015	113865	Nelson	Jack	1/1/2016	11/7/2015	11/20/2015	79.07	\$753.38	\$0.00
22827	11/27/2015	30295	Ogbazghi	Dawit	11/1/2011	11/7/2015	11/20/2015	162.41	\$1,960.15	\$0.00
22828	11/27/2015	27001	Olson	David	10/1/2015	11/7/2015	11/20/2015	74.42	\$619.52	\$0.00
22829	11/27/2015	3868	Olson	Eric	8/1/2012	11/7/2015	11/20/2015	45.19	\$445.72	\$0.00
22830	11/27/2015	107567	Ordaz	Guillermo	7/1/2015	11/7/2015	11/20/2015	86.27	\$673.86	\$0.00
22831	11/27/2015	3717	Ozgulgec	Tunc	10/1/2011	11/7/2015	11/20/2015	101.85	\$1,169.12	\$0.00
22832	11/27/2015	110552	Padilla	Rosemarie	5/1/2015	11/7/2015	11/20/2015	60.21	\$602.30	\$0.00
22833	11/27/2015	31283	Pak	Sam	7/1/2008	11/7/2015	11/20/2015	116.87	\$1,605.70	\$0.00
22834	11/27/2015	22498	Paris	John	1/1/2016	11/7/2015	11/20/2015	98.22	\$791.01	\$0.00
22835	11/27/2015	112670	Parry	Keith	9/1/2014	11/7/2015	11/20/2015	93.50	\$940.61	\$0.00
22836	11/27/2015	3806	Pearson	Jon	4/1/2012	11/7/2015	11/20/2015	81.33	\$969.66	\$0.00
22838	11/27/2015	15968	Peterson	Kenneth	1/1/2009	11/7/2015	11/20/2015	103.64	\$1,275.02	\$0.00
22839	11/27/2015	106089	Phillips	Larry	11/1/2013	11/7/2015	11/20/2015	103.00	\$1,396.49	\$0.00
22840	11/27/2015	2826	Pitts	Amir	7/1/2008	11/7/2015	11/20/2015	108.83	\$1,413.82	\$0.00
22841	11/27/2015	112342	Pizzimenti	Santo	5/1/2015	11/7/2015	11/20/2015	86.16	\$939.49	\$0.00
22842	11/27/2015	26679	Polchinski	Paul	9/1/2014	11/7/2015	11/20/2015	59.61	\$558.54	\$0.00
22843	11/27/2015	106825	Preza	Rowena	4/1/2015	11/7/2015	11/20/2015	62.36	\$486.44	\$0.00
22844	11/27/2015	109845	Pruitt	Charles	6/1/2015	11/7/2015	11/20/2015	128.95	\$1,132.31	\$0.00
22846	11/27/2015	23178	Raffensperger	Jeffrey	5/1/2014	11/7/2015	11/20/2015	127.73	\$1,516.49	\$0.00
22847	11/27/2015	113507	Ramirez-Ram	Omar	10/1/2015	11/7/2015	11/20/2015	104.79	\$1,237.94	\$0.00
22848	11/27/2015	3812	Ray	William	4/1/2012	11/7/2015	11/20/2015	75.52	\$912.19	\$0.00
22850	11/27/2015	2237	Relopez	Craig	7/1/2008	11/7/2015	11/20/2015	39.30	\$402.38	\$0.00
22851	11/27/2015	113964	Rezaei	Ryan	5/1/2015	11/7/2015	11/20/2015	75.47	\$903.92	\$0.00
22852	11/27/2015	113948	Riazi	Seyedmoham	5/1/2015	11/7/2015	11/20/2015	113.25	\$1,187.38	\$0.00
22853	11/27/2015	14261	Riipi	Karl	12/1/2013	11/7/2015	11/20/2015	68.42	\$700.72	\$0.00
22854	11/27/2015	111648	Robinson	Jeffrey	11/1/2014	11/7/2015	11/20/2015	84.33	\$762.05	\$0.00
22855	11/27/2015	104171	Robinson	Mikalani	5/1/2014	11/7/2015	11/20/2015	63.41	\$469.78	\$0.00
22856	11/27/2015	114033	Rodde	Thomas	5/1/2015	11/7/2015	11/20/2015	94.36	\$889.08	\$0.00
22857	11/27/2015	3814	Rohlas	Polly	4/1/2012	11/7/2015	11/20/2015	57.04	\$598.45	\$0.00
22858	11/27/2015	114618	Romero	James	1/1/2016	11/7/2015	11/20/2015	83.55	\$605.84	\$0.00
22860	11/27/2015	111078	Ross	Sherman	7/1/2015	11/7/2015	11/20/2015	90.53	\$841.98	\$0.00
22861	11/27/2015	112826	Sameh	Abdul	11/1/2014	11/7/2015	11/20/2015	93.86	\$1,280.44	\$0.00

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22862	11/27/2015	29249	Sameni	Abbas	9/1/2014	11/7/2015	11/20/2015	100.68	\$1,050.32	\$0.00
22863	11/27/2015	108213	Savino	Christopher	5/1/2015	11/7/2015	11/20/2015	92.35	\$874.17	\$0.00
22864	11/27/2015	105273	Sayed	Jamil	6/1/2012	11/7/2015	11/20/2015	106.31	\$1,230.16	\$0.00
22865	11/27/2015	25981	Schroeder	William	11/1/2008	11/7/2015	11/20/2015	107.02	\$950.63	\$0.00
22866	11/27/2015	3359	Sevillet	Otto	8/1/2010	11/7/2015	11/20/2015	79.55	\$812.84	\$0.00
22867	11/27/2015	112766	Sibre	Christopher	8/1/2014	11/7/2015	11/20/2015	94.83	\$1,262.63	\$0.00
22868	11/27/2015	23388	Simmons	John	7/1/2008	11/7/2015	11/20/2015	56.48	\$533.63	\$0.00
22869	11/27/2015	114568	Simms	William	2/1/2016	11/7/2015	11/20/2015	81.16	\$654.56	\$0.00
22870	11/27/2015	106103	Smallwood	Linn	4/1/2015	11/7/2015	11/20/2015	114.46	\$937.89	\$0.00
22871	11/27/2015	112181	Smith	Alex	6/1/2015	11/7/2015	11/20/2015	110.25	\$1,111.17	\$0.00
22845	11/27/2015	110015	Smith	Donna	11/1/2015	11/7/2015	11/20/2015	133.49	\$1,190.87	\$0.00
22873	11/27/2015	108547	Solano	Domingo	9/1/2015	11/7/2015	11/20/2015	100.70	\$1,089.47	\$0.00
22874	11/27/2015	2638	Soto	Jacob	7/1/2008	11/7/2015	11/20/2015	109.28	\$1,227.61	\$0.00
22875	11/27/2015	3757	Steck	Gregory	1/1/2012	11/7/2015	11/20/2015	84.68	\$810.82	\$0.00
22876	11/27/2015	3872	Stockton	Clarence	8/1/2012	11/7/2015	11/20/2015	110.00	\$1,136.19	\$0.00
22877	11/27/2015	104248	Suddarth	Robert	1/1/2016	11/7/2015	11/20/2015	83.89	\$899.83	\$0.00
22878	11/27/2015	25450	Tafesh	George	3/1/2009	11/7/2015	11/20/2015	87.00	\$865.90	\$0.00
22879	11/27/2015	109384	Tarango	Jose	12/1/2015	11/7/2015	11/20/2015	109.31	\$1,179.02	\$0.00
22880	11/27/2015	109745	Taylor	David	12/1/2013	11/7/2015	11/20/2015	46.01	\$555.83	\$0.00
22881	11/27/2015	111463	Taylor	Fredrick	8/1/2015	11/7/2015	11/20/2015	106.86	\$792.71	\$0.00
22882	11/27/2015	102232	Thetprasit	Lou	2/1/2015	11/7/2015	11/20/2015	88.70	\$1,061.58	\$0.00
22883	11/27/2015	23143	Thomas	Marc	5/1/2015	11/7/2015	11/20/2015	95.35	\$982.57	\$0.00
22884	11/27/2015	3867	Thompson	Glen	8/1/2012	11/7/2015	11/20/2015	53.18	\$449.10	\$0.00
22885	11/27/2015	27963	Thompson	Michael	11/1/2011	11/7/2015	11/20/2015	92.51	\$796.40	\$0.00
22886	11/27/2015	114361	Toledano	Alexis	11/1/2015	11/7/2015	11/20/2015	86.43	\$841.44	\$0.00
22887	11/27/2015	107060	Trujillo-Camp	Bernardino	2/1/2016	11/7/2015	11/20/2015	35.10	\$282.58	\$0.00
22888	11/27/2015	20386	Tucker	Carl	6/1/2009	11/7/2015	11/20/2015	18.62	\$169.74	\$0.00
22889	11/27/2015	22597	Turner	James	10/1/2015	11/7/2015	11/20/2015	98.99	\$1,028.10	\$0.00
22890	11/27/2015	110836	Uba	Chima	8/1/2014	11/7/2015	11/20/2015	61.32	\$629.33	\$0.00
22891	11/27/2015	111338	Valiente	Pedro	5/1/2015	11/7/2015	11/20/2015	87.26	\$759.00	\$0.00
22892	11/27/2015	113920	Vargo	Keli	4/1/2015	11/7/2015	11/20/2015	86.63	\$846.87	\$0.00
22893	11/27/2015	104958	Volchek	Boris	2/1/2015	11/7/2015	11/20/2015	68.82	\$871.14	\$0.00
22894	11/27/2015	3796	Vongthep	Christopher	3/1/2012	11/7/2015	11/20/2015	97.89	\$1,106.85	\$0.00
22895	11/27/2015	3058	Wallace	James	5/1/2009	11/7/2015	11/20/2015	55.66	\$578.86	\$0.00
22896	11/27/2015	3820	Wallace	Roy	5/1/2012	11/7/2015	11/20/2015	57.32	\$432.08	\$0.00
22897	11/27/2015	100619	Walls	Charles	7/1/2015	11/7/2015	11/20/2015	44.85	\$401.11	\$0.00
22898	11/27/2015	113891	Washington	Kenneth	5/1/2015	11/7/2015	11/20/2015	94.75	\$794.67	\$0.00
22899	11/27/2015	3496	Weaver	Gerie	4/1/2011	11/7/2015	11/20/2015	71.17	\$597.44	\$0.00
22900	11/27/2015	2785	Welborn	Paul	5/1/2012	11/7/2015	11/20/2015	37.96	\$437.27	\$0.00
22901	11/27/2015	113682	Wible	Gregory	8/1/2015	11/7/2015	11/20/2015	56.23	\$454.83	\$0.00
22902	11/27/2015	113240	Woldemichael	Meles	11/1/2015	11/7/2015	11/20/2015	139.49	\$1,880.28	\$0.00
22903	11/27/2015	110866	Wolfe	Thomas	8/1/2013	11/7/2015	11/20/2015	64.40	\$672.29	\$0.00
22904	11/27/2015	3910	Wong	Jorge	1/1/2013	11/7/2015	11/20/2015	65.89	\$746.11	\$0.00
22906	11/27/2015	3092	Yabut	Gerry	6/1/2009	11/7/2015	11/20/2015	116.76	\$1,291.47	\$0.00
22907	11/27/2015	114275	Yerima	Mollah	7/1/2015	11/7/2015	11/20/2015	100.56	\$934.26	\$0.00
22908	11/27/2015	113075	Yu	Mary	9/1/2015	11/7/2015	11/20/2015	115.42	\$970.80	\$0.00
22909	11/27/2015	30374	Zafar	John	6/1/2010	11/7/2015	11/20/2015	120.78	\$1,805.76	\$0.00
22910	11/27/2015	114189	Zaldivar	Maikel	11/1/2015	11/7/2015	11/20/2015	61.73	\$588.46	\$0.00
22911	11/27/2015	2273	Zawoudie	Masfen	7/1/2008	11/7/2015	11/20/2015	62.20	\$694.36	\$0.00
22912	11/27/2015	111519	Zghaier	Hassan	11/1/2015	11/7/2015	11/20/2015	95.46	\$1,052.91	\$0.00
22994	12/11/2015	112948	Abdalla	Mustafa	5/1/2015	11/21/2015	12/4/2015	90.80	\$950.90	\$0.00
22995	12/11/2015	2640	Abuel	Alan	7/1/2008	11/21/2015	12/4/2015	120.91	\$1,533.41	\$0.00
22996	12/11/2015	100221	Ackman	Charles	4/1/2013	11/21/2015	12/4/2015	73.88	\$724.10	\$0.00
22997	12/11/2015	109164	Alardi	Steven	1/1/2016	11/21/2015	12/4/2015	84.75	\$666.43	\$0.00

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22999	12/11/2015	24802	Altamirano	Keith	10/1/2014	11/21/2015	12/4/2015	93.88	\$1,070.18	\$0.00
23000	12/11/2015	103822	Alvarado	Santiago	9/1/2014	11/21/2015	12/4/2015	101.11	\$747.82	\$0.00
23001	12/11/2015	29709	Andersen	Jason	5/1/2009	11/21/2015	12/4/2015	69.08	\$505.89	\$0.00
23002	12/11/2015	106828	Anderson	Calvin	2/1/2013	11/21/2015	12/4/2015	98.89	\$878.28	\$0.00
23003	12/11/2015	114697	Anderson	Neal	10/1/2015	11/21/2015	12/4/2015	80.08	\$719.81	\$0.00
23004	12/11/2015	3650	Anif	Janeid	3/1/2012	11/21/2015	12/4/2015	66.31	\$762.95	\$0.00
23005	12/11/2015	114669	Anon	Nelson	10/1/2015	11/21/2015	12/4/2015	80.89	\$682.85	\$0.00
23006	12/11/2015	106151	Apodaca	Orlando	7/1/2015	11/21/2015	12/4/2015	120.87	\$921.46	\$0.00
23007	12/11/2015	3730	Arar	Isam	10/1/2011	11/21/2015	12/4/2015	43.23	\$483.42	\$0.00
23008	12/11/2015	26553	Arnwine	Howard	4/1/2012	11/21/2015	12/4/2015	72.72	\$617.80	\$0.00
23009	12/11/2015	113714	Arrandt	Robert	12/1/2015	11/21/2015	12/4/2015	87.82	\$636.73	\$0.00
23010	12/11/2015	113763	Arroyo	Carlos	10/1/2015	11/21/2015	12/4/2015	93.39	\$819.92	\$0.00
23011	12/11/2015	114195	Arzola	Juan	6/1/2015	11/21/2015	12/4/2015	104.89	\$1,382.51	\$0.00
23012	12/11/2015	103560	Awad	Edward	10/1/2015	11/21/2015	12/4/2015	87.34	\$632.95	\$0.26
23013	12/11/2015	114706	Bagley	Shaun	2/1/2016	11/21/2015	12/4/2015	129.36	\$937.34	\$0.52
23014	12/11/2015	113134	Baker	Jason	1/1/2016	11/21/2015	12/4/2015	74.41	\$539.29	\$0.18
23015	12/11/2015	112015	Bambenek	Matthew	3/1/2014	11/21/2015	12/4/2015	80.54	\$996.00	\$0.00
23016	12/11/2015	112978	Bancod	Michael	3/1/2015	11/21/2015	12/4/2015	62.17	\$564.71	\$0.00
23017	12/11/2015	100158	Barnes	Benjamin	9/1/2011	11/21/2015	12/4/2015	48.48	\$351.25	\$0.23
23018	12/11/2015	16654	Barnhart	John	7/1/2015	11/21/2015	12/4/2015	110.49	\$892.72	\$0.00
23019	12/11/2015	26073	Barnola	Rafael	1/1/2016	11/21/2015	12/4/2015	89.28	\$709.69	\$0.00
23020	12/11/2015	113542	Basoalto-San	Lucia	9/1/2015	11/21/2015	12/4/2015	99.53	\$840.99	\$0.00
23021	12/11/2015	2454	Batista	Eugenio	7/1/2008	11/21/2015	12/4/2015	68.39	\$603.77	\$0.00
23022	12/11/2015	100286	Bedane	Belay	3/1/2015	11/21/2015	12/4/2015	78.77	\$571.22	\$0.00
23023	12/11/2015	110687	Berger	James	5/1/2014	11/21/2015	12/4/2015	30.63	\$287.60	\$0.00
23024	12/11/2015	112830	Bestard-Sanc	Vladimir	12/1/2015	11/21/2015	12/4/2015	42.93	\$343.52	\$0.00
23025	12/11/2015	23373	Bey	Ronald	4/1/2009	11/21/2015	12/4/2015	42.77	\$542.92	\$0.00
23026	12/11/2015	3581	Borges	Antonio	9/1/2011	11/21/2015	12/4/2015	67.06	\$685.52	\$0.00
23027	12/11/2015	101034	Bower	Terry	3/1/2015	11/21/2015	12/4/2015	97.31	\$1,167.04	\$0.00
23029	12/11/2015	3949	Brown	Daniel	4/1/2013	11/21/2015	12/4/2015	36.80	\$1,083.89	\$0.00
23030	12/11/2015	107492	Brown	Jimmy	9/1/2014	11/21/2015	12/4/2015	58.34	\$586.24	\$0.00
23031	12/11/2015	106463	Capone	Gary	2/1/2014	11/21/2015	12/4/2015	67.88	\$561.81	\$0.00
23032	12/11/2015	2660	Carracedo	Sonny	7/1/2008	11/21/2015	12/4/2015	84.28	\$907.31	\$0.00
23033	12/11/2015	3899	Casiello	Anthony	12/1/2012	11/21/2015	12/4/2015	38.82	\$281.64	\$0.00
23034	12/11/2015	102334	Castellanos	Joaquin	8/1/2014	11/21/2015	12/4/2015	19.23	\$281.97	\$0.00
23035	12/11/2015	21398	Chenpanas	Surapan	11/1/2015	11/21/2015	12/4/2015	96.00	\$756.73	\$0.00
23036	12/11/2015	29301	Cicerchi	Michael	12/1/2015	11/21/2015	12/4/2015	98.12	\$834.30	\$0.00
23037	12/11/2015	106890	Co	Pedro	11/1/2015	11/21/2015	12/4/2015	99.14	\$718.46	\$0.30
23038	12/11/2015	2051	Costello	Brad	7/1/2008	11/21/2015	12/4/2015	98.71	\$1,033.76	\$0.00
23039	12/11/2015	15756	Craddock	Mason	12/1/2015	11/21/2015	12/4/2015	62.63	\$454.21	\$0.00
23040	12/11/2015	112510	Crawford	Dustin	10/1/2015	11/21/2015	12/4/2015	79.16	\$574.27	\$0.00
23041	12/11/2015	109796	Curtin	Ronald	7/1/2013	11/21/2015	12/4/2015	74.02	\$549.33	\$0.00
23042	12/11/2015	112564	Cyiark	Billy	9/1/2015	11/21/2015	12/4/2015	126.53	\$932.19	\$0.00
23043	12/11/2015	109130	Dacayanan	Liza	9/1/2013	11/21/2015	12/4/2015	104.65	\$900.87	\$0.00
23044	12/11/2015	23948	Daffron	Daniel	6/1/2013	11/21/2015	12/4/2015	63.28	\$772.95	\$0.00
23045	12/11/2015	110936	Daniels	James	7/1/2013	11/21/2015	12/4/2015	57.65	\$849.36	\$0.00
23046	12/11/2015	111137	Dejacto	Giovanna	10/1/2013	11/21/2015	12/4/2015	112.33	\$822.06	\$0.00
23047	12/11/2015	112508	Demick Jr.	William	3/1/2015	11/21/2015	12/4/2015	105.81	\$913.97	\$0.00
23048	12/11/2015	3936	Dial	Donald	3/1/2013	11/21/2015	12/4/2015	83.43	\$782.76	\$0.00
23049	12/11/2015	111351	Diomande	Almamy	6/1/2015	11/21/2015	12/4/2015	124.88	\$905.91	\$0.00
23050	12/11/2015	3756	Disbrow	Ronald	1/1/2012	11/21/2015	12/4/2015	53.55	\$481.88	\$0.00
23051	12/11/2015	3395	Dixon	Julius	11/1/2010	11/21/2015	12/4/2015	125.52	\$1,092.65	\$0.00
23052	12/11/2015	114946	Dopson	Gary	1/1/2016	11/21/2015	12/4/2015	103.96	\$753.84	\$0.00
23053	12/11/2015	2006	Durtschi	Jeffrey	7/1/2008	11/21/2015	12/4/2015	110.02	\$1,305.72	\$0.00

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22943	12/11/2015	115072	Dutton	Dionne	2/1/2016	11/21/2015	12/4/2015	21.86	\$166.65	\$0.00
23054	12/11/2015	112745	Ebert	Michael	12/1/2015	11/21/2015	12/4/2015	105.27	\$925.97	\$0.00
23055	12/11/2015	2637	Edwards	Jeffrey	7/1/2008	11/21/2015	12/4/2015	84.62	\$925.15	\$0.00
23056	12/11/2015	3595	Ekoue	Ayi	10/1/2011	11/21/2015	12/4/2015	89.10	\$850.17	\$0.00
23057	12/11/2015	109641	Emling	Paul	8/1/2012	11/21/2015	12/4/2015	29.67	\$374.27	\$0.00
23058	12/11/2015	108744	Esparza	Francisco	4/1/2015	11/21/2015	12/4/2015	92.64	\$930.93	\$0.00
23060	12/11/2015	112418	Faye	Pape	11/1/2015	11/21/2015	12/4/2015	89.87	\$777.56	\$0.00
23061	12/11/2015	104153	Feller	Anthony	12/1/2015	11/21/2015	12/4/2015	111.05	\$804.98	\$0.13
23062	12/11/2015	108011	Fernandez-Le	Alexander	6/1/2015	11/21/2015	12/4/2015	53.36	\$610.01	\$0.00
23063	12/11/2015	3549	Fesehazion	Teabe	7/1/2011	11/21/2015	12/4/2015	74.75	\$731.77	\$0.00
23064	12/11/2015	109381	Fitzsimmons	Marc	8/1/2014	11/21/2015	12/4/2015	82.58	\$928.57	\$0.00
23065	12/11/2015	30616	Flores	Abner	10/1/2014	11/21/2015	12/4/2015	113.23	\$1,020.09	\$0.00
23066	12/11/2015	114873	Flournoy	Carr	12/1/2015	11/21/2015	12/4/2015	119.02	\$862.73	\$0.16
23067	12/11/2015	25493	Fragoza	Michael	5/1/2015	11/21/2015	12/4/2015	56.40	\$477.62	\$0.00
23068	12/11/2015	24791	Garcia	Anthony	6/1/2013	11/21/2015	12/4/2015	66.37	\$492.64	\$0.00
23069	12/11/2015	2782	Garcia	John	7/1/2008	11/21/2015	12/4/2015	98.22	\$879.31	\$0.00
23070	12/11/2015	111531	Gay	Phillip	8/1/2015	11/21/2015	12/4/2015	86.80	\$629.69	\$0.00
23071	12/11/2015	113914	Gazzara	Anthony	4/1/2015	11/21/2015	12/4/2015	93.02	\$747.90	\$0.00
23072	12/11/2015	29297	Gebremichea	Yohannes	9/1/2014	11/21/2015	12/4/2015	58.88	\$557.85	\$0.00
23073	12/11/2015	31780	Gilbert	David	8/1/2009	11/21/2015	12/4/2015	127.71	\$926.10	\$0.00
23074	12/11/2015	3696	Gillett	David	5/1/2012	11/21/2015	12/4/2015	29.22	\$305.55	\$0.00
23075	12/11/2015	106897	Goettsche	Dale	6/1/2013	11/21/2015	12/4/2015	114.27	\$1,155.52	\$0.00
23076	12/11/2015	115000	Goree	Latia	1/1/2016	11/21/2015	12/4/2015	39.04	\$282.98	\$0.06
23077	12/11/2015	102141	Gray	Charles	1/1/2016	11/21/2015	12/4/2015	60.70	\$493.95	\$0.00
23078	12/11/2015	19253	Gray	Gary	4/1/2012	11/21/2015	12/4/2015	62.47	\$553.20	\$0.00
22998	12/11/2015	111916	Gray	Kenneth	12/1/2015	11/21/2015	12/4/2015	75.54	\$548.36	\$0.00
23079	12/11/2015	102800	Habte	Micheal	10/1/2015	11/21/2015	12/4/2015	71.22	\$724.63	\$0.00
23080	12/11/2015	16636	Hallowell	William	2/1/2016	11/21/2015	12/4/2015	86.90	\$668.57	\$0.00
23081	12/11/2015	21446	Handlon	Michael	6/1/2013	11/21/2015	12/4/2015	53.29	\$482.79	\$0.00
23082	12/11/2015	3402	Hansen	Jordan	11/1/2010	11/21/2015	12/4/2015	135.83	\$1,279.96	\$0.00
23083	12/11/2015	3855	Harris	Dennis	6/1/2012	11/21/2015	12/4/2015	75.70	\$785.05	\$0.00
23084	12/11/2015	115097	Harris	James	2/1/2016	11/21/2015	12/4/2015	85.99	\$623.01	\$0.42
23085	12/11/2015	19800	Hasbrouck Jr	Ronald	9/1/2015	11/21/2015	12/4/2015	109.39	\$1,059.78	\$0.00
23086	12/11/2015	112912	Hassanzadeh	Davoud	11/1/2014	11/21/2015	12/4/2015	61.47	\$806.86	\$0.00
23087	12/11/2015	102378	Hatch Jr.	Frank	4/1/2015	11/21/2015	12/4/2015	38.94	\$363.77	\$0.00
23088	12/11/2015	115043	Hawkins	Devin	1/1/2016	11/21/2015	12/4/2015	47.23	\$355.31	\$0.00
23089	12/11/2015	114928	Herrlich	Curt	1/1/2016	11/21/2015	12/4/2015	86.77	\$720.04	\$0.00
23090	12/11/2015	2097	Hinks	Dana	7/1/2008	11/21/2015	12/4/2015	38.32	\$449.03	\$0.00
23091	12/11/2015	32082	Hoffman	Gary	4/1/2009	11/28/2015	12/4/2015	88.36	\$642.21	\$0.00
23093	12/11/2015	2751	Hurtado	Hubert	7/1/2008	11/21/2015	12/4/2015	57.34	\$513.15	\$0.00
23094	12/11/2015	3187	Isaac	Edsel	10/1/2009	11/21/2015	12/4/2015	56.47	\$686.44	\$0.00
23096	12/11/2015	107992	Jacobi	Donald	8/1/2013	11/21/2015	12/4/2015	108.68	\$787.72	\$0.21
23097	12/11/2015	3020	Jarmosco	John	3/1/2009	11/21/2015	12/4/2015	77.23	\$1,087.12	\$0.00
23098	12/11/2015	15638	Jawaid	Shaikh	11/1/2015	11/21/2015	12/4/2015	103.28	\$749.21	\$0.00
23099	12/11/2015	28842	Jimerson-Ces	Jo A	8/1/2015	11/21/2015	12/4/2015	83.13	\$685.31	\$0.00
23100	12/11/2015	29542	Kang	Chong	8/1/2009	11/21/2015	12/4/2015	81.88	\$838.80	\$0.00
23101	12/11/2015	106153	Keller	Roger	7/1/2013	11/21/2015	12/4/2015	58.89	\$546.27	\$0.00
23102	12/11/2015	2736	Kenary	Brian	7/1/2008	11/21/2015	12/4/2015	50.45	\$491.35	\$0.00
23103	12/11/2015	27999	Khan	Zia-Ur-Rehma	7/1/2015	11/21/2015	12/4/2015	103.31	\$748.74	\$0.26
23104	12/11/2015	107692	Kim	Chang	5/1/2015	11/21/2015	12/4/2015	110.53	\$1,261.94	\$0.00
23106	12/11/2015	3893	Klein	Phillip	11/1/2012	11/21/2015	12/4/2015	59.45	\$446.93	\$0.00
23107	12/11/2015	114375	Ko	Kuen	12/1/2015	11/21/2015	12/4/2015	135.45	\$1,031.84	\$0.00
23108	12/11/2015	3630	Kogan	Martin	1/1/2012	11/21/2015	12/4/2015	51.81	\$742.15	\$0.00
23109	12/11/2015	105627	Kronenberg	Arthur	4/1/2015	11/21/2015	12/4/2015	26.86	\$194.72	\$0.01

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23110	12/11/2015	103826	Kull Jr.	William	6/1/2014	11/21/2015	12/4/2015	51.37	\$581.55	\$0.00
23111	12/11/2015	107625	Lafarge	Jeannine	7/1/2014	11/21/2015	12/4/2015	81.57	\$956.70	\$0.00
23112	12/11/2015	114766	Laughinghouse	Charles	11/1/2015	11/21/2015	12/4/2015	113.32	\$918.16	\$0.00
23114	12/11/2015	3685	Leal	Jill	5/1/2012	11/21/2015	12/4/2015	96.96	\$1,066.17	\$0.00
23115	12/11/2015	108034	Leonardi	Kevin	11/1/2015	11/21/2015	12/4/2015	65.01	\$471.29	\$0.03
23116	12/11/2015	15804	Little	Dennis	12/1/2011	11/21/2015	12/4/2015	83.30	\$797.19	\$0.00
23117	12/11/2015	18903	Lozada	Giovanni	8/1/2015	11/28/2015	12/4/2015	105.11	\$1,018.67	\$0.00
23118	12/11/2015	3778	Macato	Jaime	1/1/2012	11/21/2015	12/4/2015	74.97	\$543.67	\$0.00
23119	12/11/2015	18640	Mahtani	Ratan	7/1/2015	11/21/2015	12/4/2015	87.67	\$636.04	\$0.00
23120	12/11/2015	100830	Mahyar	Yamine	1/1/2016	11/21/2015	12/4/2015	103.50	\$759.12	\$0.00
23121	12/11/2015	2757	Majors	John	7/1/2008	11/21/2015	12/4/2015	62.70	\$590.00	\$0.00
23122	12/11/2015	3583	Maras	Maria	10/1/2011	11/21/2015	12/4/2015	93.66	\$766.23	\$0.00
23123	12/11/2015	25853	Mari-Santa Cruz	Samuel	3/1/2015	11/21/2015	12/4/2015	81.93	\$593.89	\$0.10
23124	12/11/2015	110053	Martinez	Francisco	8/1/2013	11/21/2015	12/4/2015	89.85	\$822.73	\$0.00
23125	12/11/2015	110618	Mastrio	Pamela	5/1/2014	11/21/2015	12/4/2015	105.75	\$801.21	\$0.00
23126	12/11/2015	110395	Maxwell	Charles	11/1/2015	11/21/2015	12/4/2015	53.06	\$384.71	\$0.00
23127	12/11/2015	103078	Mayer	Zygmund	2/1/2016	11/21/2015	12/4/2015	52.64	\$381.84	\$0.00
23128	12/11/2015	2587	McCarter	Patrick	7/1/2008	11/21/2015	12/4/2015	66.91	\$515.10	\$0.00
23129	12/11/2015	113696	McGinn	Randall	11/1/2015	11/21/2015	12/4/2015	44.72	\$371.52	\$0.00
23130	12/11/2015	25641	McSkimming	John	5/1/2014	11/21/2015	12/4/2015	95.71	\$780.25	\$0.00
23131	12/11/2015	101698	Mecke	Robert	1/1/2016	11/21/2015	12/4/2015	65.22	\$473.16	\$0.00
23132	12/11/2015	29265	Micu	Emilio	9/1/2014	11/21/2015	12/4/2015	82.16	\$923.30	\$0.00
23133	12/11/2015	114922	Middleton	Shawn	12/1/2015	11/21/2015	12/4/2015	106.42	\$772.02	\$0.00
23134	12/11/2015	30196	Miller	Jason	11/1/2013	11/21/2015	12/4/2015	55.29	\$662.43	\$0.00
23135	12/11/2015	112009	Mock	Karen	10/1/2014	11/21/2015	12/4/2015	119.05	\$1,085.40	\$0.00
23136	12/11/2015	101935	Mohamed	Hamza	9/1/2014	11/21/2015	12/4/2015	86.11	\$1,044.67	\$0.00
23137	12/11/2015	105284	Monforte II	Peter	1/1/2012	11/21/2015	12/4/2015	109.73	\$1,041.01	\$0.00
23138	12/11/2015	30777	Moore	Jimmy	7/1/2008	11/21/2015	12/4/2015	100.71	\$730.24	\$0.00
23139	12/11/2015	3664	Moreno	James	3/1/2012	11/21/2015	12/4/2015	114.03	\$826.77	\$0.00
23140	12/11/2015	112561	Morgan	Sherryl	2/1/2015	11/21/2015	12/4/2015	61.43	\$596.43	\$0.00
23141	12/11/2015	8321	Morris	Thomas	1/1/2012	11/21/2015	12/4/2015	64.66	\$688.57	\$0.00
22944	12/11/2015	107704	Muhtari	Abdulrahman	2/1/2013	11/21/2015	12/4/2015	78.75	\$570.59	\$0.35
23142	12/11/2015	109569	Munoz-Fernandez	Ariel	12/1/2015	11/21/2015	12/4/2015	19.68	\$142.66	\$0.02
23143	12/11/2015	3847	Murawski	Richard	6/1/2012	11/21/2015	12/4/2015	74.72	\$998.45	\$0.00
23144	12/11/2015	113865	Nelson	Jack	1/1/2016	11/21/2015	12/4/2015	80.14	\$581.19	\$0.00
23146	12/11/2015	30295	Ogbazghi	Dawit	11/1/2011	11/21/2015	12/4/2015	99.95	\$1,123.15	\$0.00
23147	12/11/2015	27001	Olson	David	10/1/2015	11/21/2015	12/4/2015	56.80	\$411.82	\$0.00
23148	12/11/2015	107567	Ordaz	Guillermo	7/1/2015	11/21/2015	12/4/2015	86.42	\$667.31	\$0.00
23149	12/11/2015	3717	Ozgulgec	Tunc	10/1/2011	11/21/2015	12/4/2015	86.86	\$741.95	\$0.00
23150	12/11/2015	110552	Padilla	Rosemarie	5/1/2015	11/21/2015	12/4/2015	33.22	\$240.95	\$0.00
23151	12/11/2015	31283	Pak	Sam	7/1/2008	11/21/2015	12/4/2015	83.32	\$1,017.99	\$0.00
23152	12/11/2015	22498	Paris	John	1/1/2016	11/21/2015	12/4/2015	95.69	\$693.39	\$0.36
23153	12/11/2015	112670	Parry	Keith	9/1/2014	11/21/2015	12/4/2015	90.94	\$1,008.52	\$0.00
23154	12/11/2015	3806	Pearson	Jon	4/1/2012	11/21/2015	12/4/2015	80.12	\$815.89	\$0.00
23156	12/11/2015	15968	Peterson	Kenneth	1/1/2009	11/21/2015	12/4/2015	121.10	\$1,354.43	\$0.00
23157	12/11/2015	1076	Peterson	Steven	7/1/2008	11/21/2015	12/4/2015	85.57	\$852.63	\$0.00
23158	12/11/2015	106089	Phillips	Larry	11/1/2013	11/21/2015	12/4/2015	98.91	\$1,092.65	\$0.00
23159	12/11/2015	2826	Pitts	Amir	7/1/2008	11/21/2015	12/4/2015	96.93	\$1,104.61	\$0.00
23160	12/11/2015	112342	Pizzimenti	Santo	5/1/2015	11/21/2015	12/4/2015	69.14	\$501.53	\$0.00
23161	12/11/2015	26679	Polchinski	Paul	9/1/2014	11/21/2015	12/4/2015	46.59	\$509.80	\$0.00
23162	12/11/2015	106825	Preza	Rowena	4/1/2015	11/21/2015	12/4/2015	65.87	\$477.71	\$0.00
23163	12/11/2015	109845	Pruitt	Charles	6/1/2015	11/21/2015	12/4/2015	117.71	\$853.22	\$0.18
23165	12/11/2015	23178	Raffensperger	Jeffrey	5/1/2014	11/21/2015	12/4/2015	111.98	\$1,088.51	\$0.00
23166	12/11/2015	113507	Ramirez-Ramirez	Omar	10/1/2015	11/21/2015	12/4/2015	103.91	\$1,004.51	\$0.00

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23167	12/11/2015	3812	Ray	William	4/1/2012	11/21/2015	12/4/2015	77.21	\$927.60	\$0.00
23169	12/11/2015	2237	Relopez	Craig	7/1/2008	11/21/2015	12/4/2015	69.75	\$665.86	\$0.00
23170	12/11/2015	113964	Rezaei	Ryan	5/1/2015	11/21/2015	12/4/2015	76.57	\$691.02	\$0.00
23171	12/11/2015	113948	Riazi	Seyedmoham	5/1/2015	11/21/2015	12/4/2015	85.52	\$742.10	\$0.00
23172	12/11/2015	14261	Riipi	Karl	12/1/2013	11/21/2015	12/4/2015	79.48	\$901.38	\$0.00
23173	12/11/2015	111648	Robinson	Jeffrey	11/1/2014	11/21/2015	12/4/2015	53.60	\$414.11	\$0.00
23174	12/11/2015	104171	Robinson	Mikalani	5/1/2014	11/21/2015	12/4/2015	74.62	\$540.81	\$0.19
23175	12/11/2015	114033	Rodde	Thomas	5/1/2015	11/21/2015	12/4/2015	94.69	\$866.99	\$0.00
23176	12/11/2015	3814	Rohlas	Polly	4/1/2012	11/21/2015	12/4/2015	49.23	\$374.37	\$0.00
23177	12/11/2015	114618	Romero	James	1/1/2016	11/21/2015	12/4/2015	119.44	\$865.61	\$0.33
23179	12/11/2015	111078	Ross	Sherman	7/1/2015	11/21/2015	12/4/2015	88.73	\$660.62	\$0.00
23180	12/11/2015	112826	Sameh	Abdul	11/1/2014	11/21/2015	12/4/2015	82.80	\$942.51	\$0.00
23181	12/11/2015	29249	Sameni	Abbas	9/1/2014	11/21/2015	12/4/2015	77.12	\$800.99	\$0.00
23182	12/11/2015	108213	Savino	Christopher	5/1/2015	11/21/2015	12/4/2015	63.77	\$462.30	\$0.03
23183	12/11/2015	105273	Sayed	Jamil	6/1/2012	11/21/2015	12/4/2015	105.80	\$934.64	\$0.00
23184	12/11/2015	25981	Schroeder	William	11/1/2008	11/21/2015	12/4/2015	110.82	\$819.21	\$0.00
23185	12/11/2015	3359	Sevillet	Otto	8/1/2010	11/21/2015	12/4/2015	77.52	\$562.35	\$0.00
23186	12/11/2015	112766	Sibre	Christopher	8/1/2014	11/21/2015	12/4/2015	78.89	\$968.80	\$0.00
23187	12/11/2015	23388	Simmons	John	7/1/2008	11/21/2015	12/4/2015	56.50	\$683.93	\$0.00
23188	12/11/2015	114568	Simms	William	2/1/2016	11/21/2015	12/4/2015	84.54	\$613.14	\$0.00
23189	12/11/2015	106103	Smallwood	Linn	4/1/2015	11/21/2015	12/4/2015	115.37	\$1,059.03	\$0.00
23948	12/11/2015	112181	Smith	Alex	6/1/2015	11/21/2015	12/4/2015	102.79	\$956.16	\$0.00
23164	12/11/2015	110015	Smith	Donna	11/1/2015	11/21/2015	12/4/2015	135.02	\$1,081.23	\$0.00
23192	12/11/2015	108547	Solano	Domingo	9/1/2015	11/21/2015	12/4/2015	67.14	\$615.73	\$0.00
23193	12/11/2015	2638	Soto	Jacob	7/1/2008	11/21/2015	12/4/2015	68.95	\$933.62	\$0.00
23194	12/11/2015	3757	Steck	Gregory	1/1/2012	11/21/2015	12/4/2015	84.71	\$614.25	\$0.00
23195	12/11/2015	3872	Stockton	Clarence	8/1/2012	11/21/2015	12/4/2015	97.92	\$1,078.85	\$0.00
23196	12/11/2015	104248	Suddarth	Robert	1/1/2016	11/21/2015	12/4/2015	94.08	\$876.10	\$0.00
23197	12/11/2015	25450	Tafesh	George	3/1/2009	11/21/2015	12/4/2015	42.25	\$385.26	\$0.00
23198	12/11/2015	109384	Tarango	Jose	12/1/2015	11/21/2015	12/4/2015	101.96	\$844.74	\$0.00
23199	12/11/2015	109745	Taylor	David	12/1/2013	11/21/2015	12/4/2015	48.66	\$517.91	\$0.00
23200	12/11/2015	111463	Taylor	Fredrick	8/1/2015	11/21/2015	12/4/2015	94.90	\$687.68	\$0.35
23201	12/11/2015	102232	Thetprasit	Lou	2/1/2015	11/21/2015	12/4/2015	65.31	\$768.21	\$0.00
23202	12/11/2015	23143	Thomas	Marc	5/1/2015	11/21/2015	12/4/2015	94.60	\$865.38	\$0.00
23203	12/11/2015	3867	Thompson	Glen	8/1/2012	11/21/2015	12/4/2015	26.93	\$287.39	\$0.00
23204	12/11/2015	27963	Thompson	Michael	11/1/2011	11/21/2015	12/4/2015	59.77	\$571.69	\$0.00
23205	12/11/2015	114361	Toledano	Alexis	11/1/2015	11/21/2015	12/4/2015	93.84	\$902.01	\$0.00
23206	12/11/2015	107060	Trujillo-Camp	Bernardino	2/1/2016	11/21/2015	12/4/2015	111.55	\$808.21	\$0.53
23207	12/11/2015	20386	Tucker	Carl	6/1/2009	11/21/2015	12/4/2015	18.71	\$244.45	\$0.00
23208	12/11/2015	22597	Turner	James	10/1/2015	11/21/2015	12/4/2015	111.91	\$980.34	\$0.00
23209	12/11/2015	110836	Uba	Chima	8/1/2014	11/21/2015	12/4/2015	65.53	\$639.81	\$0.00
23210	12/11/2015	111338	Valiente	Pedro	5/1/2015	11/21/2015	12/4/2015	98.79	\$817.80	\$0.00
23211	12/11/2015	113920	Vargo	Keli	4/1/2015	11/21/2015	12/4/2015	66.06	\$682.48	\$0.00
23212	12/11/2015	104958	Volchek	Boris	2/1/2015	11/21/2015	12/4/2015	37.40	\$413.73	\$0.00
23213	12/11/2015	3796	Vongthep	Christopher	3/1/2012	11/21/2015	12/4/2015	101.95	\$1,045.74	\$0.00
23214	12/11/2015	3058	Wallace	James	5/1/2009	11/21/2015	12/4/2015	46.62	\$486.71	\$0.00
23215	12/11/2015	3820	Wallace	Roy	5/1/2012	11/21/2015	12/4/2015	78.24	\$567.05	\$0.19
23216	12/11/2015	100619	Walls	Charles	7/1/2015	11/21/2015	12/4/2015	64.39	\$577.95	\$0.00
23217	12/11/2015	113891	Washington	Kenneth	5/1/2015	11/21/2015	12/4/2015	101.00	\$751.10	\$0.00
23218	12/11/2015	3496	Weaver	Gerie	4/1/2011	11/21/2015	12/4/2015	79.95	\$579.40	\$0.24
23219	12/11/2015	2785	Welborn	Paul	5/1/2012	11/21/2015	12/4/2015	39.33	\$518.61	\$0.00
23220	12/11/2015	113682	Wible	Gregory	8/1/2015	11/21/2015	12/4/2015	47.14	\$341.65	\$0.11
23221	12/11/2015	113240	Woldemichael	Meles	11/1/2015	11/21/2015	12/4/2015	136.91	\$1,381.10	\$0.00
23222	12/11/2015	110866	Wolfe	Thomas	8/1/2013	11/21/2015	12/4/2015	42.87	\$515.43	\$0.00

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23223	12/11/2015	3910	Wong	Jorge	1/1/2013	11/21/2015	12/4/2015	66.56	\$649.30	\$0.00
23225	12/11/2015	3092	Yabut	Gerry	6/1/2009	11/21/2015	12/4/2015	115.77	\$1,247.18	\$0.00
23226	12/11/2015	114275	Yerima	Mollah	7/1/2015	11/21/2015	12/4/2015	96.15	\$1,005.30	\$0.00
23227	12/11/2015	113075	Yu	Mary	9/1/2015	11/21/2015	12/4/2015	103.12	\$747.17	\$0.45
23228	12/11/2015	30374	Zafar	John	6/1/2010	11/21/2015	12/4/2015	103.52	\$1,236.67	\$0.00
23229	12/11/2015	114189	Zaldivar	Maikel	11/1/2015	11/21/2015	12/4/2015	62.31	\$510.22	\$0.00
23230	12/11/2015	2273	Zawoudie	Masfen	7/1/2008	11/21/2015	12/4/2015	63.96	\$721.57	\$0.00
23231	12/11/2015	111519	Zghaier	Hassan	11/1/2015	11/21/2015	12/4/2015	92.78	\$732.38	\$0.00
23328	12/25/2015	112948	Abdalla	Mustafa	5/1/2015	12/5/2015	12/18/2015	90.58	\$783.15	\$0.00
23329	12/25/2015	2640	Abuel	Alan	7/1/2008	12/5/2015	12/18/2015	86.38	\$790.51	\$0.00
23330	12/25/2015	100221	Ackman	Charles	4/1/2013	12/5/2015	12/18/2015	58.20	\$609.23	\$0.00
23331	12/25/2015	109164	Alardi	Steven	1/1/2016	12/5/2015	12/18/2015	96.54	\$778.03	\$0.00
23333	12/25/2015	24802	Altamirano	Keith	10/1/2014	12/5/2015	12/18/2015	100.40	\$1,208.05	\$0.00
23334	12/25/2015	103822	Alvarado	Santiago	9/1/2014	12/5/2015	12/18/2015	97.14	\$704.64	\$0.00
23335	12/25/2015	29709	Andersen	Jason	5/1/2009	12/5/2015	12/18/2015	85.04	\$633.90	\$0.00
23336	12/25/2015	106828	Anderson	Calvin	2/1/2013	12/5/2015	12/18/2015	88.09	\$703.51	\$0.00
23337	12/25/2015	114697	Anderson	Neal	10/1/2015	12/5/2015	12/18/2015	66.31	\$570.34	\$0.00
23338	12/25/2015	3650	Anif	Janeid	3/1/2012	12/5/2015	12/18/2015	56.11	\$622.40	\$0.00
23339	12/25/2015	114669	Anon	Nelson	10/1/2015	12/5/2015	12/18/2015	89.42	\$690.96	\$0.00
23340	12/25/2015	106151	Apodaca	Orlando	7/1/2015	12/5/2015	12/18/2015	115.52	\$837.86	\$0.00
23341	12/25/2015	3730	Arar	Isam	10/1/2011	12/5/2015	12/18/2015	34.33	\$268.72	\$0.00
23342	12/25/2015	26553	Arnwine	Howard	4/1/2012	12/5/2015	12/18/2015	72.36	\$707.63	\$0.00
23343	12/25/2015	113714	Arrandt	Robert	12/1/2015	12/5/2015	12/18/2015	94.30	\$683.71	\$0.00
23344	12/25/2015	113763	Arroyo	Carlos	10/1/2015	12/5/2015	12/18/2015	122.91	\$1,111.59	\$0.00
23345	12/25/2015	114195	Arzola	Juan	6/1/2015	12/5/2015	12/18/2015	163.26	\$2,037.89	\$0.00
23346	12/25/2015	103560	Awad	Edward	10/1/2015	12/5/2015	12/18/2015	88.48	\$641.24	\$0.24
23308	12/25/2015	114706	Bagley	Shaun	2/1/2016	12/5/2015	12/18/2015	45.43	\$329.29	\$0.08
23347	12/25/2015	113134	Baker	Jason	1/1/2016	12/5/2015	12/18/2015	55.59	\$577.17	\$0.00
23348	12/25/2015	112015	Bambenek	Matthew	3/1/2014	12/5/2015	12/18/2015	81.67	\$981.58	\$0.00
23349	12/25/2015	112978	Bancod	Michael	3/1/2015	12/5/2015	12/18/2015	66.59	\$698.83	\$0.00
23350	12/25/2015	100158	Barnes	Benjamin	9/1/2011	12/5/2015	12/18/2015	97.73	\$733.80	\$0.00
23351	12/25/2015	16654	Barnhart	John	7/1/2015	12/5/2015	12/18/2015	109.63	\$886.85	\$0.00
23352	12/25/2015	26073	Barnola	Rafael	1/1/2016	12/5/2015	12/18/2015	68.35	\$533.58	\$0.00
23353	12/25/2015	113542	Basoalto-San	Lucia	9/1/2015	12/5/2015	12/18/2015	114.48	\$1,070.35	\$0.00
23354	12/25/2015	2454	Batista	Eugenio	7/1/2008	12/5/2015	12/18/2015	90.51	\$894.07	\$0.00
23355	12/25/2015	100286	Bedane	Belay	3/1/2015	12/5/2015	12/18/2015	66.64	\$494.50	\$0.00
23356	12/25/2015	110687	Berger	James	5/1/2014	12/5/2015	12/18/2015	81.15	\$771.26	\$0.00
23357	12/25/2015	112830	Bestard-Sand	Vladimir	12/1/2015	12/5/2015	12/18/2015	64.64	\$468.52	\$0.12
23358	12/25/2015	23373	Bey	Ronald	4/1/2009	12/5/2015	12/18/2015	69.62	\$656.78	\$0.00
23359	12/25/2015	3581	Borges	Antonio	9/1/2011	12/5/2015	12/18/2015	30.90	\$356.86	\$0.00
23360	12/25/2015	101034	Bower	Terry	3/1/2015	12/5/2015	12/18/2015	108.03	\$1,213.75	\$0.00
23362	12/25/2015	3949	Brown	Daniel	4/1/2013	12/5/2015	12/18/2015	22.84	\$860.08	\$0.00
23363	12/25/2015	107492	Brown	Jimmy	9/1/2014	12/5/2015	12/18/2015	103.10	\$937.86	\$0.00
23364	12/25/2015	106463	Capone	Gary	2/1/2014	12/5/2015	12/18/2015	76.81	\$660.82	\$0.00
23365	12/25/2015	2660	Carracedo	Sonny	7/1/2008	12/5/2015	12/18/2015	83.62	\$776.79	\$0.00
23366	12/25/2015	3899	Casiello	Anthony	12/1/2012	12/5/2015	12/18/2015	88.84	\$657.75	\$0.00
23367	12/25/2015	102334	Castellanos	Joaquin	8/1/2014	12/5/2015	12/18/2015	93.49	\$678.16	\$0.00
23368	12/25/2015	21398	Chenpanas	Surapan	11/1/2015	12/5/2015	12/18/2015	87.72	\$649.86	\$0.00
23369	12/25/2015	29301	Cicerchi	Michael	12/1/2015	12/5/2015	12/18/2015	110.44	\$890.29	\$0.00
23264	12/25/2015	106890	Co	Pedro	11/1/2015	12/5/2015	12/18/2015	32.27	\$233.91	\$0.05
23370	12/25/2015	2051	Costello	Brad	7/1/2008	12/5/2015	12/18/2015	94.79	\$886.53	\$0.00
23371	12/25/2015	15756	Craddock	Mason	12/1/2015	12/5/2015	12/18/2015	57.12	\$414.32	\$0.00
23372	12/25/2015	112510	Crawford	Dustin	10/1/2015	12/5/2015	12/18/2015	95.92	\$695.21	\$0.21
23373	12/25/2015	109796	Curtin	Ronald	7/1/2013	12/5/2015	12/18/2015	84.32	\$627.98	\$0.00

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23374	12/25/2015	112564	Cyiark	Billy	9/1/2015	12/5/2015	12/18/2015	103.23	\$748.51	\$0.00
23375	12/25/2015	109130	Dacayanan	Liza	9/1/2013	12/5/2015	12/18/2015	97.16	\$779.94	\$0.00
23376	12/25/2015	23948	Daffron	Daniel	6/1/2013	12/5/2015	12/18/2015	69.02	\$590.46	\$0.00
23377	12/25/2015	110936	Daniels	James	7/1/2013	12/5/2015	12/18/2015	51.22	\$603.16	\$0.00
23378	12/25/2015	111137	Dejacto	Giovanna	10/1/2013	12/5/2015	12/18/2015	111.84	\$1,051.11	\$0.00
23379	12/25/2015	112508	Demick Jr.	William	3/1/2015	12/5/2015	12/18/2015	114.22	\$828.65	\$0.00
23380	12/25/2015	3936	Dial	Donald	3/1/2013	12/5/2015	12/18/2015	48.72	\$508.35	\$0.00
23265	12/25/2015	111351	Diomande	Almamy	6/1/2015	12/5/2015	12/18/2015	23.58	\$171.47	\$0.00
23381	12/25/2015	3756	Disbrow	Ronald	1/1/2012	12/5/2015	12/18/2015	53.68	\$390.99	\$0.00
23382	12/25/2015	3395	Dixon	Julius	11/1/2010	12/5/2015	12/18/2015	129.58	\$1,429.59	\$0.00
23383	12/25/2015	114946	Dopson	Gary	1/1/2016	12/5/2015	12/18/2015	114.66	\$1,081.13	\$0.00
23384	12/25/2015	2006	Durtschi	Jeffrey	7/1/2008	12/5/2015	12/18/2015	122.46	\$1,381.77	\$0.00
23385	12/25/2015	112745	Ebert	Michael	12/1/2015	12/5/2015	12/18/2015	105.00	\$833.62	\$0.00
23386	12/25/2015	2637	Edwards	Jeffrey	7/1/2008	12/5/2015	12/18/2015	92.79	\$810.18	\$0.00
23387	12/25/2015	3595	Ekoue	Ayi	10/1/2011	12/5/2015	12/18/2015	69.72	\$588.93	\$0.00
23388	12/25/2015	109641	Emling	Paul	8/1/2012	12/5/2015	12/18/2015	40.42	\$532.42	\$0.00
23389	12/25/2015	108744	Esparza	Francisco	4/1/2015	12/5/2015	12/18/2015	59.81	\$433.85	\$0.00
23391	12/25/2015	14595	Estrada	Jorge	3/1/2016	12/5/2015	12/18/2015	30.26	\$219.53	\$0.00
23392	12/25/2015	112418	Faye	Pape	11/1/2015	12/5/2015	12/18/2015	112.47	\$948.88	\$0.00
23393	12/25/2015	104153	Feller	Anthony	12/1/2015	12/5/2015	12/18/2015	110.99	\$804.77	\$0.00
23394	12/25/2015	108011	Fernandez-Le	Alexander	6/1/2015	12/5/2015	12/18/2015	9.86	\$71.47	\$0.02
23395	12/25/2015	3549	Fesehazion	Teabe	7/1/2011	12/5/2015	12/18/2015	85.00	\$708.92	\$0.00
23396	12/25/2015	109381	Fitzsimmons	Marc	8/1/2014	12/5/2015	12/18/2015	86.25	\$731.59	\$0.00
23397	12/25/2015	30616	Flores	Abner	10/1/2014	12/5/2015	12/18/2015	101.45	\$851.98	\$0.00
23398	12/25/2015	114873	Flournoy	Carr	12/1/2015	12/5/2015	12/18/2015	119.55	\$916.38	\$0.00
23399	12/25/2015	25493	Fragoza	Michael	5/1/2015	12/5/2015	12/18/2015	76.35	\$719.76	\$0.00
23400	12/25/2015	24791	Garcia	Anthony	6/1/2013	12/5/2015	12/18/2015	88.24	\$682.28	\$0.00
23401	12/25/2015	2782	Garcia	John	7/1/2008	12/5/2015	12/18/2015	107.01	\$941.28	\$0.00
23402	12/25/2015	111531	Gay	Phillip	8/1/2015	12/5/2015	12/18/2015	93.88	\$680.86	\$0.00
23403	12/25/2015	113914	Gazzara	Anthony	4/1/2015	12/5/2015	12/18/2015	90.78	\$827.43	\$0.00
23404	12/25/2015	29297	Gebremichea	Yohannes	9/1/2014	12/5/2015	12/18/2015	38.89	\$352.21	\$0.00
23405	12/25/2015	31780	Gilbert	David	8/1/2009	12/5/2015	12/18/2015	132.42	\$1,072.94	\$0.00
23406	12/25/2015	3696	Gillett	David	5/1/2012	12/5/2015	12/18/2015	63.90	\$463.36	\$0.00
23407	12/25/2015	114601	Godfrey	Brenda	10/1/2015	12/5/2015	12/18/2015	57.80	\$555.44	\$0.00
23408	12/25/2015	106897	Goettsche	Dale	6/1/2013	12/5/2015	12/18/2015	116.87	\$1,179.83	\$0.00
23409	12/25/2015	102141	Gray	Charles	1/1/2016	12/5/2015	12/18/2015	69.16	\$501.50	\$0.00
23410	12/25/2015	19253	Gray	Gary	4/1/2012	12/5/2015	12/18/2015	69.16	\$510.34	\$0.00
23332	12/25/2015	111916	Gray	Kenneth	12/1/2015	12/5/2015	12/18/2015	87.72	\$635.69	\$0.28
23411	12/25/2015	102800	Habte	Micheal	10/1/2015	12/5/2015	12/18/2015	94.40	\$895.78	\$0.00
23412	12/25/2015	16636	Hallowell	William	2/1/2016	12/5/2015	12/18/2015	120.38	\$1,033.68	\$0.00
23413	12/25/2015	3402	Hansen	Jordan	11/1/2010	12/5/2015	12/18/2015	122.92	\$1,061.33	\$0.00
23414	12/25/2015	3855	Harris	Dennis	6/1/2012	12/5/2015	12/18/2015	94.41	\$752.29	\$0.00
23415	12/25/2015	115097	Harris	James	2/1/2016	12/5/2015	12/18/2015	88.83	\$732.30	\$0.00
23416	12/25/2015	19800	Hasbrouck Jr	Ronald	9/1/2015	12/5/2015	12/18/2015	110.78	\$1,038.93	\$0.00
23417	12/25/2015	112912	Hassanzadeh	Davoud	11/1/2014	12/5/2015	12/18/2015	61.61	\$717.41	\$0.00
23418	12/25/2015	102378	Hatch Jr.	Frank	4/1/2015	12/5/2015	12/18/2015	39.37	\$364.37	\$0.00
23419	12/25/2015	115043	Hawkins	Devin	1/1/2016	12/5/2015	12/18/2015	37.14	\$269.24	\$0.02
23420	12/25/2015	114928	Herrlich	Curt	1/1/2016	12/5/2015	12/18/2015	85.04	\$616.46	\$0.08
23422	12/25/2015	32082	Hoffman	Gary	4/1/2009	12/12/2015	12/18/2015	80.78	\$690.58	\$0.00
23423	12/25/2015	113529	Horvath	Zoltan	3/1/2016	12/5/2015	12/18/2015	72.89	\$521.43	\$7.02
23425	12/25/2015	2751	Hurtado	Hubert	7/1/2008	12/5/2015	12/18/2015	48.83	\$378.41	\$0.00
23426	12/25/2015	3187	Isaac	Edsel	10/1/2009	12/5/2015	12/18/2015	50.13	\$525.48	\$0.00
23428	12/25/2015	107992	Jacobi	Donald	8/1/2013	12/5/2015	12/18/2015	93.14	\$708.27	\$0.00
23429	12/25/2015	3020	Jarmosco	John	3/1/2009	12/5/2015	12/18/2015	60.69	\$776.86	\$0.00

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23430	12/25/2015	15638	Jawaid	Shaikh	11/1/2015	12/5/2015	12/18/2015	103.21	\$763.47	\$0.00
23431	12/25/2015	28842	Jimerson-Ces	Jo A	8/1/2015	12/5/2015	12/18/2015	63.88	\$639.21	\$0.00
23432	12/25/2015	29542	Kang	Chong	8/1/2009	12/5/2015	12/18/2015	83.19	\$802.07	\$0.00
23433	12/25/2015	106153	Keller	Roger	7/1/2013	12/5/2015	12/18/2015	74.60	\$578.62	\$0.00
23434	12/25/2015	2736	Kenary	Brian	7/1/2008	12/5/2015	12/18/2015	59.59	\$506.14	\$0.00
23435	12/25/2015	27999	Khan	Zia-Ur-Rehma	7/1/2015	12/5/2015	12/18/2015	128.09	\$928.27	\$0.38
23436	12/25/2015	107692	Kim	Chang	5/1/2015	12/5/2015	12/18/2015	109.20	\$1,059.50	\$0.00
23438	12/25/2015	3893	Klein	Phillip	11/1/2012	12/5/2015	12/18/2015	72.98	\$756.47	\$0.00
23439	12/25/2015	114375	Ko	Kuen	12/1/2015	12/5/2015	12/18/2015	139.18	\$1,142.36	\$0.00
23440	12/25/2015	3630	Kogan	Martin	1/1/2012	12/5/2015	12/18/2015	55.82	\$660.50	\$0.00
23441	12/25/2015	103826	Kull Jr.	William	6/1/2014	12/5/2015	12/18/2015	61.39	\$688.03	\$0.00
23442	12/25/2015	107625	Lafarge	Jeannine	7/1/2014	12/5/2015	12/18/2015	75.96	\$881.80	\$0.00
23443	12/25/2015	114766	Laughinghou	Charles	11/1/2015	12/5/2015	12/18/2015	102.42	\$793.03	\$0.00
23445	12/25/2015	3685	Leal	Jill	5/1/2012	12/5/2015	12/18/2015	93.91	\$906.00	\$0.00
23446	12/25/2015	108034	Leonardi	Kevin	11/1/2015	12/5/2015	12/18/2015	55.74	\$503.70	\$0.00
23447	12/25/2015	15804	Little	Dennis	12/1/2011	12/5/2015	12/18/2015	85.40	\$689.57	\$0.00
23448	12/25/2015	18903	Lozada	Giovanni	8/1/2015	12/12/2015	12/18/2015	63.44	\$576.35	\$0.00
23449	12/25/2015	3778	Macato	Jaime	1/1/2012	12/5/2015	12/18/2015	116.87	\$1,046.23	\$0.00
23450	12/25/2015	18640	Mahtani	Ratan	7/1/2015	12/5/2015	12/18/2015	67.72	\$491.17	\$0.00
23451	12/25/2015	100830	Mahyar	Yamine	1/1/2016	12/5/2015	12/18/2015	100.86	\$868.62	\$0.00
23452	12/25/2015	2757	Majors	John	7/1/2008	12/5/2015	12/18/2015	60.16	\$464.39	\$0.00
23453	12/25/2015	3583	Maras	Maria	10/1/2011	12/5/2015	12/18/2015	110.79	\$1,222.84	\$0.00
23454	12/25/2015	25853	Mari-Santa C	Samuel	3/1/2015	12/5/2015	12/18/2015	90.54	\$881.32	\$0.00
23455	12/25/2015	110053	Martinez	Francisco	8/1/2013	12/5/2015	12/18/2015	72.79	\$762.83	\$0.00
23456	12/25/2015	110618	Mastrio	Pamela	5/1/2014	12/5/2015	12/18/2015	109.25	\$892.46	\$0.00
23457	12/25/2015	110395	Maxwell	Charles	11/1/2015	12/5/2015	12/18/2015	52.55	\$380.89	\$0.10
23458	12/25/2015	103078	Mayer	Zygmund	2/1/2016	12/5/2015	12/18/2015	64.84	\$494.65	\$0.00
23459	12/25/2015	2587	McCarter	Patrick	7/1/2008	12/5/2015	12/18/2015	68.38	\$536.64	\$0.00
23460	12/25/2015	113696	McGinn	Randall	11/1/2015	12/5/2015	12/18/2015	45.72	\$344.92	\$0.00
23461	12/25/2015	25641	McSkimming	John	5/1/2014	12/5/2015	12/18/2015	83.62	\$626.61	\$0.00
23462	12/25/2015	101698	Mecke	Robert	1/1/2016	12/5/2015	12/18/2015	101.81	\$738.18	\$0.00
23463	12/25/2015	29265	Micu	Emilio	9/1/2014	12/5/2015	12/18/2015	79.98	\$901.62	\$0.00
23464	12/25/2015	114922	Middleton	Shawn	12/1/2015	12/5/2015	12/18/2015	84.82	\$615.01	\$0.00
23465	12/25/2015	30196	Miller	Jason	11/1/2013	12/5/2015	12/18/2015	61.15	\$710.20	\$0.00
23466	12/25/2015	112009	Mock	Karen	10/1/2014	12/5/2015	12/18/2015	97.96	\$745.94	\$0.00
23467	12/25/2015	101935	Mohamed	Hamza	9/1/2014	12/5/2015	12/18/2015	112.29	\$1,285.42	\$0.00
23468	12/25/2015	105284	Monforte II	Peter	1/1/2012	12/5/2015	12/18/2015	110.20	\$831.18	\$0.00
23469	12/25/2015	30777	Moore	Jimmy	7/1/2008	12/5/2015	12/18/2015	108.43	\$785.86	\$0.26
23470	12/25/2015	3664	Moreno	James	3/1/2012	12/5/2015	12/18/2015	115.44	\$836.93	\$0.01
23471	12/25/2015	112561	Morgan	Sherryl	2/1/2015	12/5/2015	12/18/2015	84.27	\$671.79	\$0.00
23472	12/25/2015	8321	Morris	Thomas	1/1/2012	12/5/2015	12/18/2015	77.07	\$620.72	\$0.00
23473	12/25/2015	109569	Munoz-Ferna	Ariel	12/1/2015	12/5/2015	12/18/2015	9.84	\$84.30	\$0.00
23474	12/25/2015	3847	Murawski	Richard	6/1/2012	12/5/2015	12/18/2015	98.22	\$1,165.46	\$0.00
23475	12/25/2015	113865	Nelson	Jack	1/1/2016	12/5/2015	12/18/2015	79.57	\$711.51	\$0.00
23477	12/25/2015	30295	Ogbazghi	Dawit	11/1/2011	12/5/2015	12/18/2015	94.70	\$926.22	\$0.00
23478	12/25/2015	27001	Olson	David	10/1/2015	12/5/2015	12/18/2015	55.43	\$401.80	\$0.07
23479	12/25/2015	107567	Ordaz	Guillermo	7/1/2015	12/5/2015	12/18/2015	85.07	\$638.37	\$0.00
23480	12/25/2015	3717	Ozgulgec	Tunc	10/1/2011	12/5/2015	12/18/2015	84.61	\$795.77	\$0.00
23481	12/25/2015	110552	Padilla	Rosemarie	5/1/2015	12/5/2015	12/18/2015	47.19	\$385.02	\$0.00
23482	12/25/2015	31283	Pak	Sam	7/1/2008	12/5/2015	12/18/2015	111.67	\$1,332.14	\$0.00
23483	12/25/2015	22498	Paris	John	1/1/2016	12/5/2015	12/18/2015	116.77	\$846.05	\$0.53
23484	12/25/2015	112670	Parry	Keith	9/1/2014	12/5/2015	12/18/2015	79.37	\$725.88	\$0.00
23485	12/25/2015	3806	Pearson	Jon	4/1/2012	12/5/2015	12/18/2015	80.57	\$832.71	\$0.00
23487	12/25/2015	15968	Peterson	Kenneth	1/1/2009	12/5/2015	12/18/2015	91.83	\$1,023.63	\$0.00

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23488	12/25/2015	1076	Peterson	Steven	7/1/2008	12/5/2015	12/18/2015	93.04	\$861.84	\$0.00
23489	12/25/2015	106089	Phillips	Larry	11/1/2013	12/5/2015	12/18/2015	101.86	\$1,060.16	\$0.00
23490	12/25/2015	2826	Pitts	Amir	7/1/2008	12/5/2015	12/18/2015	88.15	\$1,067.65	\$0.00
23491	12/25/2015	112342	Pizzimenti	Santo	5/1/2015	12/5/2015	12/18/2015	86.46	\$830.18	\$0.00
23492	12/25/2015	26679	Polchinski	Paul	9/1/2014	12/5/2015	12/18/2015	53.21	\$511.17	\$0.00
23493	12/25/2015	106825	Preza	Rowena	4/1/2015	12/5/2015	12/18/2015	83.72	\$615.64	\$0.00
23494	12/25/2015	109845	Pruitt	Charles	6/1/2015	12/5/2015	12/18/2015	108.90	\$848.10	\$0.00
23496	12/25/2015	23178	Raffensperger	Jeffrey	5/1/2014	12/5/2015	12/18/2015	85.13	\$677.20	\$0.00
23497	12/25/2015	113507	Ramirez-Ram	Omar	10/1/2015	12/5/2015	12/18/2015	54.65	\$702.96	\$0.00
23498	12/25/2015	3812	Ray	William	4/1/2012	12/5/2015	12/18/2015	84.95	\$845.40	\$0.00
23500	12/25/2015	2237	Relopez	Craig	7/1/2008	12/5/2015	12/18/2015	83.61	\$611.47	\$0.00
23501	12/25/2015	113964	Rezaei	Ryan	5/1/2015	12/5/2015	12/18/2015	67.55	\$639.03	\$0.00
23502	12/25/2015	113948	Riazi	Seyedmoham	5/1/2015	12/5/2015	12/18/2015	64.68	\$517.32	\$0.00
23503	12/25/2015	14261	Riipi	Karl	12/1/2013	12/5/2015	12/18/2015	56.85	\$604.70	\$0.00
23504	12/25/2015	111648	Robinson	Jeffrey	11/1/2014	12/5/2015	12/18/2015	68.14	\$617.14	\$0.00
23505	12/25/2015	104171	Robinson	Mikalani	5/1/2014	12/5/2015	12/18/2015	71.24	\$516.83	\$0.00
23506	12/25/2015	114033	Rodde	Thomas	5/1/2015	12/5/2015	12/18/2015	98.76	\$988.47	\$0.00
23507	12/25/2015	3814	Rohlas	Polly	4/1/2012	12/5/2015	12/18/2015	70.01	\$565.56	\$0.00
23508	12/25/2015	114618	Romero	James	1/1/2016	12/5/2015	12/18/2015	89.87	\$651.34	\$0.22
23510	12/25/2015	111078	Ross	Sherman	7/1/2015	12/5/2015	12/18/2015	89.11	\$683.25	\$0.00
23511	12/25/2015	115163	Rozowski	Frank	3/1/2016	12/5/2015	12/18/2015	53.96	\$390.98	\$0.23
23512	12/25/2015	112826	Sameh	Abdul	11/1/2014	12/5/2015	12/18/2015	98.96	\$1,107.05	\$0.00
23513	12/25/2015	29249	Sameni	Abbas	9/1/2014	12/5/2015	12/18/2015	96.80	\$852.28	\$0.00
23514	12/25/2015	108213	Savino	Christopher	5/1/2015	12/5/2015	12/18/2015	62.94	\$456.10	\$0.22
23515	12/25/2015	105273	Sayed	Jamil	6/1/2012	12/5/2015	12/18/2015	83.67	\$753.79	\$0.00
23516	12/25/2015	25981	Schroeder	William	11/1/2008	12/5/2015	12/18/2015	110.01	\$810.20	\$0.00
23517	12/25/2015	105577	Seidman	Steven	9/1/2013	12/5/2015	12/18/2015	73.48	\$746.32	\$0.00
23518	12/25/2015	3359	Sevillet	Otto	8/1/2010	12/5/2015	12/18/2015	88.90	\$789.43	\$0.00
23519	12/25/2015	105416	Sharma	Mahesh	11/1/2014	12/5/2015	12/18/2015	88.70	\$775.68	\$0.00
23520	12/25/2015	112766	Sibre	Christopher	8/1/2014	12/5/2015	12/18/2015	79.54	\$991.16	\$0.00
23521	12/25/2015	23388	Simmons	John	7/1/2008	12/5/2015	12/18/2015	63.49	\$534.06	\$0.00
23522	12/25/2015	114568	Simms	William	2/1/2016	12/5/2015	12/18/2015	79.06	\$573.22	\$0.00
23523	12/25/2015	106103	Smallwood	Linn	4/1/2015	12/5/2015	12/18/2015	108.36	\$842.15	\$0.00
23524	12/25/2015	112181	Smith	Alex	6/1/2015	12/5/2015	12/18/2015	107.41	\$824.46	\$0.00
23495	12/25/2015	110015	Smith	Donna	11/1/2015	12/5/2015	12/18/2015	135.46	\$1,156.90	\$0.00
23526	12/25/2015	2638	Soto	Jacob	7/1/2008	12/5/2015	12/18/2015	94.55	\$921.51	\$0.00
23527	12/25/2015	3757	Steck	Gregory	1/1/2012	12/5/2015	12/18/2015	87.31	\$665.88	\$0.00
23528	12/25/2015	3872	Stockton	Clarence	8/1/2012	12/5/2015	12/18/2015	90.25	\$858.98	\$0.00
23529	12/25/2015	104248	Suddarth	Robert	1/1/2016	12/5/2015	12/18/2015	96.07	\$876.05	\$0.00
23530	12/25/2015	25450	Tafesh	George	3/1/2009	12/5/2015	12/18/2015	52.55	\$530.05	\$0.00
23531	12/25/2015	109384	Tarango	Jose	12/1/2015	12/5/2015	12/18/2015	112.70	\$972.99	\$0.00
23532	12/25/2015	109745	Taylor	David	12/1/2013	12/5/2015	12/18/2015	47.54	\$424.96	\$0.00
23533	12/25/2015	111463	Taylor	Fredrick	8/1/2015	12/5/2015	12/18/2015	100.88	\$765.53	\$0.00
23534	12/25/2015	102232	Thetprasit	Lou	2/1/2015	12/5/2015	12/18/2015	75.63	\$721.86	\$0.00
23535	12/25/2015	23143	Thomas	Marc	5/1/2015	12/5/2015	12/18/2015	93.96	\$704.81	\$0.00
23536	12/25/2015	3867	Thompson	Glen	8/1/2012	12/5/2015	12/18/2015	16.70	\$163.08	\$0.00
23537	12/25/2015	27963	Thompson	Michael	11/1/2011	12/5/2015	12/18/2015	93.49	\$678.06	\$0.00
23538	12/25/2015	114361	Toledano	Alexis	11/1/2015	12/5/2015	12/18/2015	99.82	\$948.46	\$0.00
23539	12/25/2015	107060	Trujillo-Cam	Bernardino	2/1/2016	12/5/2015	12/18/2015	100.47	\$728.72	\$0.00
23540	12/25/2015	20386	Tucker	Carl	6/1/2009	12/5/2015	12/18/2015	18.12	\$184.59	\$0.00
23541	12/25/2015	22597	Turner	James	10/1/2015	12/5/2015	12/18/2015	97.56	\$858.18	\$0.00
23542	12/25/2015	110836	Uba	Chima	8/1/2014	12/5/2015	12/18/2015	63.70	\$539.99	\$0.00
23543	12/25/2015	111338	Valiente	Pedro	5/1/2015	12/5/2015	12/18/2015	102.95	\$818.31	\$0.00
23544	12/25/2015	113920	Vargo	Keli	4/1/2015	12/5/2015	12/18/2015	83.15	\$696.95	\$0.00

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23545	12/25/2015	104958	Volchek	Boris	2/1/2015	12/5/2015	12/18/2015	85.36	\$734.16	\$0.00
23546	12/25/2015	3796	Vongthep	Christopher	3/1/2012	12/5/2015	12/18/2015	106.66	\$919.15	\$0.00
23547	12/25/2015	3058	Wallace	James	5/1/2009	12/5/2015	12/18/2015	46.38	\$413.51	\$0.00
23548	12/25/2015	3820	Wallace	Roy	5/1/2012	12/5/2015	12/18/2015	67.32	\$494.19	\$0.00
23549	12/25/2015	100619	Walls	Charles	7/1/2015	12/5/2015	12/18/2015	60.43	\$450.64	\$0.00
23550	12/25/2015	113891	Washington	Kenneth	5/1/2015	12/5/2015	12/18/2015	109.73	\$861.45	\$0.00
23551	12/25/2015	102804	Way	Amos	3/1/2016	12/5/2015	12/18/2015	9.87	\$71.52	\$0.04
23552	12/25/2015	3496	Weaver	Gerie	4/1/2011	12/5/2015	12/18/2015	47.01	\$391.02	\$0.00
23553	12/25/2015	2785	Welborn	Paul	5/1/2012	12/5/2015	12/18/2015	21.44	\$181.07	\$0.00
23554	12/25/2015	113682	Wible	Gregory	8/1/2015	12/5/2015	12/18/2015	27.54	\$235.65	\$0.00
23555	12/25/2015	113240	Woldemichael	Meles	11/1/2015	12/5/2015	12/18/2015	120.29	\$1,246.02	\$0.00
23556	12/25/2015	110866	Wolfe	Thomas	8/1/2013	12/5/2015	12/18/2015	24.01	\$575.59	\$0.00
23557	12/25/2015	3910	Wong	Jorge	1/1/2013	12/5/2015	12/18/2015	66.80	\$606.55	\$0.00
23559	12/25/2015	3092	Yabut	Gerry	6/1/2009	12/5/2015	12/18/2015	112.47	\$1,075.46	\$0.00
23560	12/25/2015	114275	Yerima	Mollah	7/1/2015	12/5/2015	12/18/2015	89.81	\$933.37	\$0.00
23561	12/25/2015	113075	Yu	Mary	9/1/2015	12/5/2015	12/18/2015	112.58	\$834.68	\$0.00
23562	12/25/2015	30374	Zafar	John	6/1/2010	12/5/2015	12/18/2015	113.99	\$1,532.48	\$0.00
23563	12/25/2015	114189	Zaldivar	Maikel	11/1/2015	12/5/2015	12/18/2015	69.12	\$576.73	\$0.00
23564	12/25/2015	2273	Zawoudie	Masfen	7/1/2008	12/5/2015	12/18/2015	81.02	\$794.35	\$0.00
23565	12/25/2015	111519	Zghaier	Hassan	11/1/2015	12/5/2015	12/18/2015	109.50	\$1,119.17	\$0.00
										\$211.72

003776

92300

EXHIBIT 6

003777

003777

EXHIBIT 6

Greenberg Core Group

	A	B	C	D	E	F	G	H			
1	Totals for All Class Members			\$900,317.34	\$132,710.47	\$1,033,027.81	\$975,666.16	\$75,348.82	3		
2	EE Number	Last Name	First Name	Total Lower Tier Minimum Wages Owed 7/1/2007 - 12/31/2015 After Set Off and Over \$10.00	Interest from 1/1 2016 through 6/30/2018	Total with Interest	Total 2007- 2015 Shortage	Set Off From USDOL Settlement	DOL Unclaimed	Drivers Terminated Prior to 2010	
576	2018	Murray	MichaelP	\$4,393.97	\$647.69	\$5,041.65	\$4,393.97		\$130.70		Leon's group sa
578	2018	Murray	Michael P.	\$770.33	\$113.55	\$883.88	\$770.33				same id # as ab
682	3544	Reno	Michael	\$4,966.19	\$732.04	\$5,698.22	\$4,966.19		\$1,048.94		Leon's group
729	26687	Sargeant	Michael	\$164.64	\$24.27	\$188.91	\$164.64				Leon's group

EXHIBIT 7

003779

003779

EXHIBIT 7

GREENBERG ERRORS

	A	B	C	D	E	F	G	H			
1	Totals for All Class Members			\$900,317.34	\$132,710.47	\$1,033,027.81	\$975,666.16	\$75,348.82	9		
2	EE Number	Last Name	First Name	Total Lower Tier Minimum Wages Owed 7/1/2007 - 12/31/2015 After Set Off and Over \$10.00	Interest from 1/1 2016 through 6/30/2018	Total with Interest	Total 2007- 2015 Shortage	Set Off From USDOL Settlement	DOL Unclaimed	Drivers Terminated Prior to 2010	
119	3716	Brimhall	Tracy	\$3,804.84	\$560.85	\$4,365.69	\$3,804.84	\$713.75			
139	3899	Casiello	Anthony	\$552.19	\$81.39	\$633.58	\$703.35	\$161.16			
264	3591	Feleke	Melak	\$979.78	\$144.42	\$1,124.20	\$1,190.60	\$200.82			
288	3642	Gaumont	Gerard	\$197.50	\$29.11	\$226.61	\$197.50	\$132.33			
499	2757	Majors	John	\$10,258.22	\$1,512.10	\$11,770.32	\$10,258.22	\$1,743.91			
556	105284	Monforte II	Peter	\$5,074.87	\$748.06	\$5,822.92	\$5,074.87	\$422.87			
565	8321	Morris	Thomas	\$4,599.67	\$678.01	\$5,277.68	\$4,599.67	\$281.10			
598	3876	Norvell	Chris	\$4,691.89	\$691.60	\$5,383.49	\$4,691.89	\$77.62			Cred
810	3867	Thompson	Glen	\$2,921.34	\$430.62	\$3,351.95	\$2,921.34	\$300.00			Cred

EXHIBIT 8

003781

003781

EXHIBIT 8

DOL UNCLAIMED

	A	B	C	D	E	F	G	H		
1	Totals for All Class Members			\$900,317.34	\$132,710.47	\$1,033,027.81	\$975,666.16	\$75,348.82	244	
2	EE Number	Last Name	First Name	Total Lower Tier Minimum Wages Owed 7/1/2007 - 12/31/2015 After Set Off and Over \$10.00	Interest from 1/1 2016 through 6/30/2018	Total with Interest	Total 2007-2015 Shortage	Set Off From USDOL Settlement	DOL Unclaimed	Drivers Terminated Prior to 2010
7	3606	Abebe	Tamrat	\$3,010.66	\$443.78	\$3,454.44	\$3,010.66		\$580.71	
8	3302	Abraha	Tesfalem	\$669.17	\$98.64	\$767.81	\$669.17		\$319.42	
13	3853	Acosta	Lorrie	\$135.08	\$19.91	\$154.99	\$135.08		\$104.00	
20	3846	Agacevic	Ibnel	\$299.99	\$44.22	\$344.21	\$299.99		\$73.83	
23	3678	Alemayehu	Tewodros	\$42.09	\$6.20	\$48.30	\$42.09		\$85.76	
25	3712	Alexander	Darvious	\$63.13	\$9.30	\$72.43	\$63.13		\$28.20	
27	3661	Ali	Abraham	\$2,224.87	\$327.95	\$2,552.82	\$2,224.87		\$180.50	
29	2903	Allen	Otis	\$9,556.92	\$1,408.73	\$10,965.65	\$9,556.92		\$513.04	
31	3787	Altamura	Vincent	\$503.89	\$74.28	\$578.17	\$503.89		\$33.68	
34	3769	Alves	Mary	\$988.61	\$145.72	\$1,134.33	\$988.61		\$165.98	
36	3645	Ameha	Samuale	\$244.82	\$36.09	\$280.91	\$244.82		\$59.05	
38	3564	Anastasio	James	\$111.24	\$16.40	\$127.63	\$111.24		\$95.76	
44	3650	Anif	Janeid	\$1,406.55	\$207.33	\$1,613.88	\$1,406.55		\$348.75	
46	2942	Appel	Howard	\$23.47	\$3.46	\$26.93	\$23.47		\$124.87	
55	3676	Asad	Tassawar	\$28.49	\$4.20	\$32.69	\$28.49		\$29.88	
58	3741	Assena	Zenebech	\$41.86	\$6.17	\$48.02	\$41.86		\$147.43	
59	3873	Atanasov	Nikolay	\$154.17	\$22.73	\$176.90	\$154.17		\$127.55	
61	3825	Atterbury	Joseph	\$159.92	\$23.57	\$183.49	\$159.92		\$92.35	
65	2926	Awalom	Alemayehu	\$8,201.42	\$1,208.92	\$9,410.35	\$8,201.42		\$123.59	
67	3605	Azzouay	El	\$135.48	\$19.97	\$155.45	\$135.48		\$21.73	
80	3760	Bardo	Timothy	\$746.65	\$110.06	\$856.71	\$746.65		\$21.53	
81	3369	Barich	Edward	\$1,270.10	\$187.22	\$1,457.31	\$1,270.10		\$31.94	
82	100158	Barnes	Benjamin	\$5,936.88	\$875.12	\$6,812.00	\$5,936.88		\$879.36	
84	107792	Barrameda	Danilo	\$56.83	\$8.38	\$65.20	\$56.83		\$48.93	
87	3829	Bartunek	Johnny	\$19.47	\$2.87	\$22.34	\$19.47		\$79.89	
89	2454	Batista (Lopez)	Eugenio	\$49.03	\$7.23	\$56.25	\$49.03		\$32.55	
95	3594	Bellegarde	Josue	\$11.51	\$1.70	\$13.21	\$11.51		\$26.22	
99	23373	Bey	Ronald	\$3,483.14	\$513.43	\$3,996.57	\$3,483.14		\$689.68	
101	2986	Black	Burton	\$1,658.10	\$244.41	\$1,902.51	\$1,658.10		\$156.72	
107	2487	Boling	Freddy	\$2,571.76	\$379.09	\$2,950.85	\$2,571.76		\$327.20	
111	3723	Bowen	Christopher	\$674.72	\$99.46	\$774.17	\$674.72		\$398.80	
113	3508	Bozic	Nebojsa	\$1,242.08	\$183.09	\$1,425.17	\$1,242.08		\$73.15	
120	3621	Brisco	Allen	\$3,226.36	\$475.58	\$3,701.93	\$3,226.36		\$1,031.98	
123	3067	Brown	Maurice	\$1,528.59	\$225.32	\$1,753.91	\$1,528.59		\$535.10	
125	2704	Buergey	Christopher	\$1,051.28	\$154.96	\$1,206.24	\$1,051.28		\$327.53	
129	3327	Butler	Bonnie	\$984.83	\$145.17	\$1,129.99	\$984.83		\$34.85	
132	109309	Caldwell Jr	Paul	\$364.22	\$53.69	\$417.90	\$364.22		\$57.13	
133	3892	Calise	Domenic	\$57.13	\$8.42	\$65.55	\$57.13		\$124.22	
134	3791	Cancio-Bet	Rene	\$282.86	\$41.69	\$324.55	\$282.86		\$86.18	
137	3733	Carr	Jamaal	\$127.11	\$18.74	\$145.84	\$127.11		\$92.35	
144	2531	Catoggio	Alfred	\$143.11	\$21.10	\$164.21	\$143.11		\$181.18	
145	3843	Caymite	Luc	\$221.02	\$32.58	\$253.60	\$221.02		\$66.67	
149	3420	Chang	Yun-Yu	\$1,093.43	\$161.18	\$1,254.60	\$1,093.43		\$270.70	
152	3663	Chasteen	Jeffery	\$38.80	\$5.72	\$44.52	\$38.80		\$67.80	
154	2420	Chau	Phi	\$45.97	\$6.78	\$52.74	\$45.97		\$90.08	
156	3249	Chico	David	\$3,982.14	\$586.98	\$4,569.12	\$3,982.14		\$632.83	
158	3729	Choudhary	Krishna	\$1,694.88	\$249.83	\$1,944.71	\$1,694.88		\$204.20	
159	3588	Christense	Rosa	\$1,878.35	\$276.88	\$2,155.22	\$1,878.35		\$535.73	
160	3881	Christodou	Panos	\$584.13	\$86.10	\$670.23	\$584.13		\$76.58	
173	2676	Collins	Donald	\$297.17	\$43.80	\$340.97	\$297.17		\$39.66	
177	3900	Coney-Cum	Keisha	\$531.04	\$78.28	\$609.32	\$531.04		\$123.56	
183	3550	Craddock	Charles	\$1,473.65	\$217.22	\$1,690.87	\$1,473.65		\$246.95	

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DOL UNCLAIMED

	Total Lower Tier Minimum Wages Owed 7/1/2007 - 12/31/2015 After Set Off and Over \$10.00							DOL Unclaimed	Drivers Terminated Prior to 2010
2	EE Number	Last Name	First Name	Interest from 1/1 2016 through 6/30/2018	Total with Interest	Total 2007- 2015 Shortage	Set Off From USDOL Settlement		
194	3777	Daniels	Donald	\$3,274.58	\$482.69	\$3,757.26	\$3,274.58	\$670.83	
197	3511	Danielsen	Danny	\$508.57	\$74.97	\$583.54	\$508.57	\$125.53	
198	3428	D'Arcy	Timothy	\$5,450.15	\$803.37	\$6,253.52	\$5,450.15	\$1,940.56	
200	28065	Davis	Bradley	\$2,249.11	\$331.53	\$2,580.64	\$2,249.11	\$1,141.83	
204	3675	Deguzman	Leloi	\$619.41	\$91.30	\$710.71	\$619.41	\$299.93	
205	2573	Deguzman	Fermin	\$294.22	\$43.37	\$337.59	\$294.22	\$21.68	
209	2057	DeMarco	William	\$581.36	\$85.69	\$667.05	\$581.36	\$90.26	
213	3719	Diaz	Aiser	\$22.90	\$3.38	\$26.28	\$22.90	\$47.76	
214	3657	Dibaba	Desta	\$958.68	\$141.31	\$1,099.99	\$958.68	\$245.14	
216	2031	Dinok	Ildiko	\$3,031.54	\$446.86	\$3,478.41	\$3,031.54	\$43.62	
222	3024	Donahoe	Stephen	\$998.20	\$147.14	\$1,145.34	\$998.20	\$142.60	
226	3830	Dotson	Contessa	\$49.54	\$7.30	\$56.84	\$49.54	\$21.75	
233	3754	Dudek	Anthony	\$1,421.81	\$209.58	\$1,631.39	\$1,421.81	\$339.82	
243	3381	Egan	Joseph	\$3,566.11	\$525.66	\$4,091.77	\$3,566.11	\$483.48	
244	3595	Ekoue	Ayi	\$2,813.75	\$414.76	\$3,228.50	\$2,813.75	\$391.64	
249	3771	Ellis	Charles	\$763.81	\$112.59	\$876.40	\$763.81	\$323.74	
257	3889	Estrada	Michael	\$217.71	\$32.09	\$249.80	\$217.71	\$76.52	
261	3795	Farah	Yohannes	\$391.88	\$57.76	\$449.64	\$391.88	\$104.26	
268	3877	Filfel	Kamal	\$3,138.25	\$462.59	\$3,600.84	\$3,138.25	\$297.56	
276	3860	Frankenbe	Grant	\$625.40	\$92.19	\$717.58	\$625.40	\$100.45	
280	3774	Furst III	James	\$48.51	\$7.15	\$55.66	\$48.51	\$38.51	
283	3652	Garcia	Miguel	\$1,119.02	\$164.95	\$1,283.96	\$1,119.02	\$448.75	
284	3522	Gardea	Alfred	\$2,589.33	\$381.68	\$2,971.01	\$2,589.33	\$355.07	
285	3694	Gared	Yaekob	\$76.99	\$11.35	\$88.34	\$76.99	\$110.08	
286	3793	Garras	Bill	\$160.33	\$23.63	\$183.97	\$160.33	\$28.81	
289	3503	Gebrayes	Henock	\$582.20	\$85.82	\$668.02	\$582.20	\$104.12	
292	3801	Gebremari	Meley	\$200.99	\$29.63	\$230.61	\$200.99	\$100.60	
297	3865	Ghori	Azhar	\$205.23	\$30.25	\$235.48	\$205.23	\$35.16	
306	3762	Godsey	Kelly	\$1,233.95	\$181.89	\$1,415.83	\$1,233.95	\$243.98	
311	3688	Golden	Theresa	\$686.85	\$101.24	\$788.10	\$686.85	\$558.38	
313	3646	Golla	Dawit	\$72.45	\$10.68	\$83.12	\$72.45	\$42.41	
314	3848	Gomez-Go	Arlene	\$138.32	\$20.39	\$158.70	\$138.32	\$86.31	
315	3903	Gonzalez	Luis	\$1,355.04	\$199.74	\$1,554.78	\$1,355.04	\$152.75	
316	3586	Gonzalez	Ramon	\$503.17	\$74.17	\$577.33	\$503.17	\$297.23	
319	3794	Goolsby	Victor	\$933.19	\$137.56	\$1,070.74	\$933.19	\$268.26	
320	3391	Grafton	Natasha	\$2,352.74	\$346.80	\$2,699.54	\$2,352.74	\$642.68	
327	2971	Gross	Timothy	\$1,831.66	\$269.99	\$2,101.65	\$1,831.66	\$141.40	
336	3895	Gyuro	John	\$343.12	\$50.58	\$393.70	\$343.12	\$92.78	
338	3636	Habtom	Ermias	\$663.42	\$97.79	\$761.21	\$663.42	\$45.75	
340	3827	Haigh III	Walter	\$202.61	\$29.87	\$232.48	\$202.61	\$154.69	
345	3734	Hanna	Christopher	\$353.39	\$52.09	\$405.48	\$353.39	\$51.95	
348	29609	Haralambo	Valko	\$260.48	\$38.40	\$298.88	\$260.48	\$20.11	
349	3519	Harms	Michael	\$1,568.25	\$231.17	\$1,799.42	\$1,568.25	\$243.29	
353	3811	Harris III	Reggie	\$19.13	\$2.82	\$21.95	\$19.13	\$44.02	
356	3656	Harun	Idris	\$114.58	\$16.89	\$131.47	\$114.58	\$65.46	
364	3634	Herbert	Christopher	\$1,177.50	\$173.57	\$1,351.06	\$1,177.50	\$278.42	
378	2017	Holcomb	Dalton	\$1,162.76	\$171.40	\$1,334.16	\$1,162.76	\$350.25	
382	3822	Holt	John	\$2,920.16	\$430.44	\$3,350.60	\$2,920.16	\$459.06	
386	3607	Hoschouer	Christina	\$1,321.54	\$194.80	\$1,516.33	\$1,321.54	\$350.61	
395	3780	Hunter	James	\$320.69	\$47.27	\$367.96	\$320.69	\$137.06	
396	3120	Huntingto	Walter	\$1,078.23	\$158.94	\$1,237.17	\$1,078.23	\$77.59	
398	3782	Hurley	Robert	\$246.55	\$36.34	\$282.89	\$246.55	\$35.22	
399	2751	Hurtado	Hubert	\$6,197.96	\$913.61	\$7,111.57	\$6,197.96	\$156.13	
400	3835	Hussien	Leykun	\$568.36	\$83.78	\$652.14	\$568.36	\$30.53	

DOL UNCLAIMED

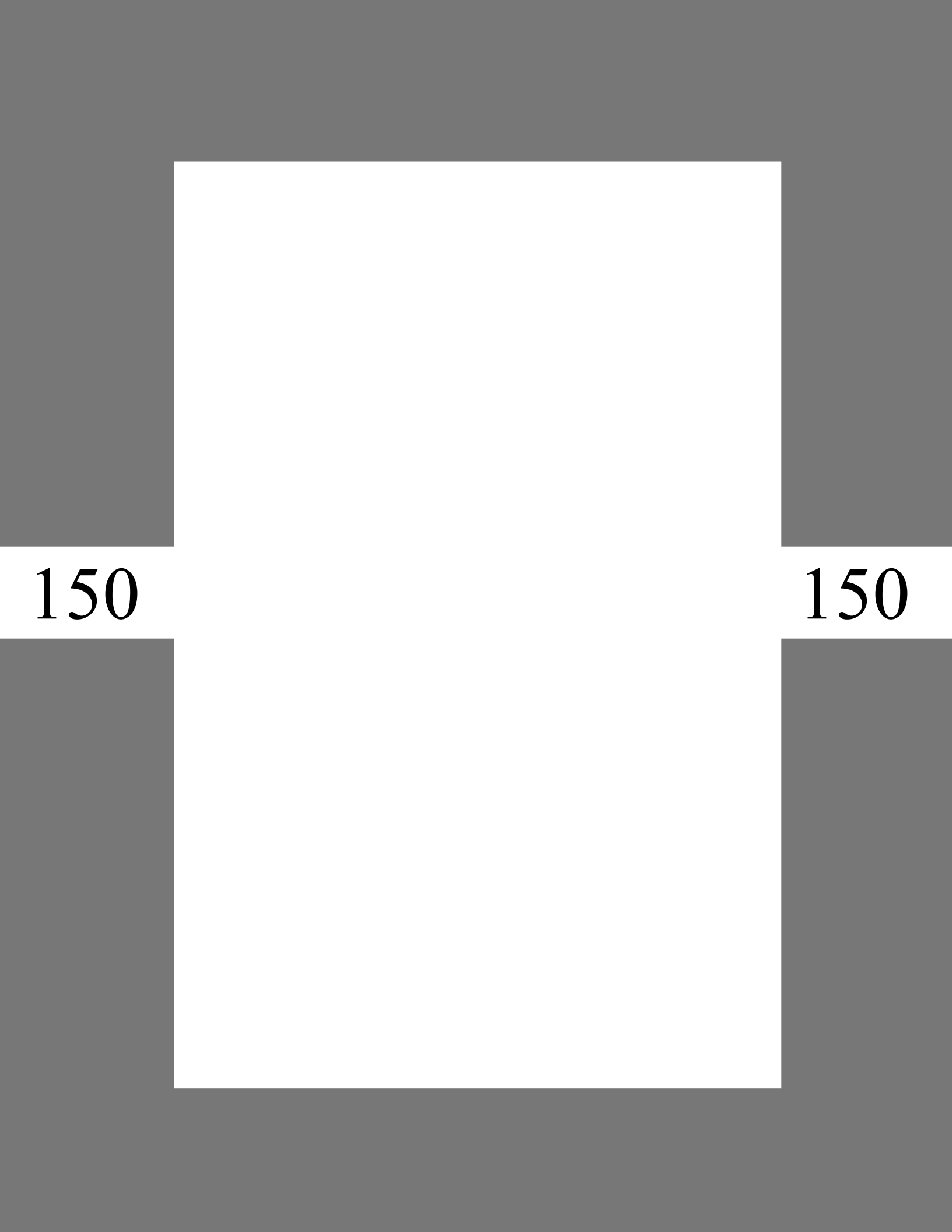
	Total Lower Tier Minimum Wages Owed 7/1/2007 - 12/31/2015 After Set Off and Over \$10.00							Interest from 1/1 2016 through 6/30/2018		Total with Interest	Total 2007- 2015 Shortage	Set Off From USDOL Settlement	DOL Unclaimed	Drivers Terminated Prior to 2010
2	EE Number	Last Name	First Name											
421	3844	Johnson	Richard		\$162.40		\$23.94		\$186.34		\$162.40		\$95.11	
434	3772	Kaiyooraw	Chaipan		\$3,065.66		\$451.89		\$3,517.55		\$3,065.66		\$237.71	
436	29542	Kang	Chong		\$219.01		\$32.28		\$251.30		\$219.01		\$338.96	
445	3637	Key	Roy		\$174.71		\$25.75		\$200.46		\$174.71		\$163.16	
451	3893	Klein	Phillip		\$3,633.02		\$535.52		\$4,168.54		\$3,633.02		\$159.32	
452	3837	Knight	Tyree		\$262.37		\$38.67		\$301.04		\$262.37		\$38.10	
458	3662	Kunik	Robert		\$301.44		\$44.43		\$345.87		\$301.44		\$72.08	
459	3878	Laico	Paul		\$102.52		\$15.11		\$117.63		\$102.52		\$36.44	
461	3535	Lantis	Glen		\$1,045.93		\$154.17		\$1,200.10		\$1,045.93		\$298.94	
469	3702	Lee	Thomas		\$2,952.81		\$435.26		\$3,388.06		\$2,952.81		\$772.76	
474	3816	Ligus	Thomas		\$219.63		\$32.37		\$252.01		\$219.63		\$23.54	
476	3681	Linzer	Steven		\$42.56		\$6.27		\$48.83		\$42.56		\$60.09	
484	3813	Lovelady	Warren		\$11.90		\$1.75		\$13.65		\$11.90		\$44.64	
494	3224	Magazin	Milorad		\$33.12		\$4.88		\$38.00		\$33.12		\$51.05	
497	2738	Mahoney	Kevin		\$638.30		\$94.09		\$732.39		\$638.30		\$55.83	
498	3096	Mainwarin	David		\$4,352.12		\$641.52		\$4,993.64		\$4,352.12		\$573.47	
511	3698	Mastrio	Angelo		\$287.39		\$42.36		\$329.75		\$287.39		\$145.19	
514	3669	Maza	Inez		\$349.93		\$51.58		\$401.51		\$349.93		\$191.28	
519	3654	McConnell	Therral		\$873.55		\$128.77		\$1,002.32		\$873.55		\$174.36	
520	3743	McCoubre	Earl		\$1,347.94		\$198.69		\$1,546.63		\$1,347.94		\$332.74	
523	3745	McGowan	Sean		\$228.69		\$33.71		\$262.40		\$228.69		\$51.68	
524	3547	McGregor	Matthew		\$1,725.05		\$254.28		\$1,979.33		\$1,725.05		\$494.20	
526	3722	McNeece	James		\$147.35		\$21.72		\$169.07		\$147.35		\$73.61	
530	3345	Mekonen	Solomon		\$557.43		\$82.17		\$639.60		\$557.43		\$52.17	
531	3066	Melesse	Abebe		\$529.55		\$78.06		\$607.60		\$529.55		\$127.31	
535	3568	Menocal	Pedro		\$1,029.70		\$151.78		\$1,181.48		\$1,029.70		\$94.66	
549	3904	Mirkulovsk	Danny		\$550.09		\$81.09		\$631.18		\$550.09		\$95.69	
554	3317	Mogeeth	Ehab		\$323.43		\$47.67		\$371.10		\$323.43		\$118.16	
557	3882	Monteagudo	Oscar		\$937.81		\$138.24		\$1,076.04		\$937.81		\$23.07	
561	3913	Moore	Aileen-Louise		\$328.57		\$48.43		\$377.01		\$328.57		\$21.49	
563	3626	Moretti	Bryan		\$1,422.89		\$209.74		\$1,632.63		\$1,422.89		\$205.46	
566	2162	Morris	Robert		\$2,890.99		\$426.14		\$3,317.13		\$2,890.99		\$777.32	
569	3785	Mostafa	Ahmed		\$500.20		\$73.73		\$573.93		\$500.20		\$130.41	
575	3847	Murawski	Richard		\$1,593.10		\$234.83		\$1,827.93		\$1,593.10		\$118.55	
580	3856	Murray	Mark		\$23.74		\$3.50		\$27.24		\$23.74		\$36.17	
584	3804	Ndichu	Simon		\$366.18		\$53.98		\$420.16		\$366.18		\$94.42	
589	25190	Ngo	Tuan		\$1,607.52		\$236.95		\$1,844.47		\$1,607.52		\$401.27	
590	3545	Nichols	Keith		\$937.37		\$138.17		\$1,075.54		\$937.37		\$134.91	
597	3639	Norberg	Christopher		\$919.23		\$135.50		\$1,054.73		\$996.85		\$195.62	Christo
604	3753	Olen	Virginia		\$2,224.07		\$327.84		\$2,551.91		\$2,224.07		\$832.05	
605	3748	Oliveros	Mario		\$671.02		\$98.91		\$769.93		\$671.02		\$148.87	
608	3644	Ontura	Tesfalem		\$259.20		\$38.21		\$297.41		\$259.20		\$32.24	
613	3894	O'Shea	Kevin		\$163.81		\$24.15		\$187.96		\$163.81		\$72.87	
615	3783	Overson	Michael		\$636.00		\$93.75		\$729.74		\$636.00		\$258.53	
616	3789	Oyebade	Vincent		\$116.31		\$17.14		\$133.45		\$116.31		\$116.68	
627	3659	Paros	Nicholas		\$14.71		\$2.17		\$16.88		\$14.71		\$35.42	
640	1076	Peterson	Steven		\$3,638.58		\$536.34		\$4,174.92		\$3,638.58		\$464.17	
641	15968	Peterson	Kenneth		\$978.12		\$144.18		\$1,122.30		\$978.12		\$354.62	
643	3740	Petrossian	Robert		\$678.86		\$100.07		\$778.92		\$678.86		\$170.72	
647	3281	Phonesava	Paul		\$1,217.26		\$179.43		\$1,396.68		\$1,217.26		\$345.06	
653	3647	Pohl	Daniel		\$186.19		\$27.45		\$213.64		\$186.19		\$23.34	
657	3563	Portillo	Mario		\$593.50		\$87.48		\$680.98		\$593.50		\$121.37	
664	3800	Price	Allen		\$630.95		\$93.00		\$723.95		\$630.95		\$65.45	

DOL UNCLAIMED

				Total Lower Tier Minimum Wages Owed 7/1/2007 - 12/31/2015 After Set Off and Over \$10.00	Interest from 1/1 2016 through 6/30/2018	Total with Interest	Total 2007- 2015 Shortage	Set Off From USDOL Settlement	DOL Unclaimed	Drivers Terminated Prior to 2010
2	EE Number	Last Name	First Name							
665	3449	Prifti	Ilia	\$418.70	\$61.72	\$480.42	\$418.70		\$195.16	
669	3556	Pyles	Joseph	\$682.49	\$100.60	\$783.09	\$682.49		\$242.04	
673	3883	Ramirez	Erney	\$760.59	\$112.11	\$872.70	\$760.59		\$193.55	
676	3525	Rasheed	Willie	\$4,450.03	\$655.95	\$5,105.98	\$4,450.03		\$683.15	
677	3812	Ray	William	\$12.61	\$1.86	\$14.47	\$12.61		\$106.07	
688	3191	Rivas	Victor	\$1,763.13	\$259.89	\$2,023.03	\$1,763.13		\$121.90	
691	3575	Roach	Jayson	\$665.36	\$98.08	\$763.44	\$665.36		\$207.14	
692	3305	Roberson	Ronnie	\$108.61	\$16.01	\$124.61	\$108.61		\$1,299.65	
693	2842	Roberts	James	\$1,756.75	\$258.95	\$2,015.70	\$1,756.75		\$342.73	
696	3629	Robles	Mark	\$49.78	\$7.34	\$57.11	\$49.78		\$32.51	
697	3744	Rockett Jr.	Roosevelt	\$81.28	\$11.98	\$93.26	\$81.28		\$22.70	
702	3587	Romero	Ruben	\$687.24	\$101.30	\$788.54	\$687.24		\$156.77	
705	3225	Ross	Larry	\$74.22	\$10.94	\$85.15	\$74.22		\$65.83	
706	3850	Rothenber	Edward	\$239.11	\$35.25	\$274.36	\$239.11		\$251.48	
707	3504	Rotich	Emertha	\$2,099.57	\$309.49	\$2,409.06	\$2,099.57		\$432.92	
708	3912	Rousseau	James	\$657.44	\$96.91	\$754.35	\$657.44		\$23.64	
710	3693	Ruby	Melissa	\$265.99	\$39.21	\$305.20	\$265.99		\$218.04	
711	3477	Ruiz	Travis	\$1,117.07	\$164.66	\$1,281.73	\$1,117.07		\$239.63	
713	3875	Russell	Darrell	\$657.42	\$96.91	\$754.33	\$657.42		\$186.60	
716	3323	Saevitz	Neil	\$2,364.73	\$348.57	\$2,713.30	\$2,364.73		\$145.90	
718	3042	Saleh	Jemal	\$8,393.73	\$1,237.27	\$9,630.99	\$8,393.73		\$854.59	
721	100128	Sampson	James	\$644.31	\$94.97	\$739.28	\$644.31		\$101.64	
723	3570	Sanders	Acy	\$737.61	\$108.73	\$846.33	\$737.61		\$57.98	
728	3648	Saravanos	John	\$5,143.32	\$758.15	\$5,901.46	\$5,143.32		\$1,224.06	
733	25981	Schroeder	William	\$2,110.35	\$311.07	\$2,421.42	\$2,110.35		\$413.62	
734	3313	Schwartz	Steven	\$4,584.18	\$675.73	\$5,259.91	\$4,584.18		\$361.64	
735	29172	Schwartz	George	\$601.41	\$88.65	\$690.06	\$601.41		\$161.57	
737	3536	Sedgwick	Anthony	\$226.67	\$33.41	\$260.08	\$226.67		\$325.46	
747	3619	Shein	Efraim	\$304.28	\$44.85	\$349.13	\$304.28		\$159.51	
749	103821	Sherman	Jason	\$214.72	\$31.65	\$246.37	\$214.72		\$138.55	
750	3724	Shinn	Kevin	\$463.14	\$68.27	\$531.41	\$463.14		\$174.08	
752	3803	Siasat	Manuel	\$32.38	\$4.77	\$37.15	\$32.38		\$21.85	
754	3758	Siegel	Jeffrey	\$91.32	\$13.46	\$104.78	\$91.32		\$27.58	
758	3524	Sinay	Abraham	\$858.58	\$126.56	\$985.14	\$858.58		\$135.18	
759	3677	Singh	Baldev	\$180.81	\$26.65	\$207.47	\$180.81		\$106.97	
760	3683	Sitotaw	Haileab	\$118.59	\$17.48	\$136.06	\$118.59		\$70.38	
762	2630	Smale	Charles	\$935.99	\$137.97	\$1,073.96	\$935.99		\$285.22	
763	3041	Smith	Lottie	\$6,722.83	\$990.97	\$7,713.81	\$6,722.83		\$362.30	
764	3521	Smith	Lisa	\$1,094.07	\$161.27	\$1,255.34	\$1,094.07		\$33.49	
770	3643	Solis	Brigido	\$174.25	\$25.69	\$199.94	\$174.25		\$168.78	
772	3854	Soree	Mladen	\$1,445.54	\$213.08	\$1,658.62	\$1,445.54		\$151.01	
778	3727	Sparks	Cody	\$19.56	\$2.88	\$22.45	\$19.56		\$27.96	
779	3845	Spaulding	Ross	\$244.25	\$36.00	\$280.25	\$244.25		\$21.87	
783	3481	Springer	Marvin	\$1,483.49	\$218.67	\$1,702.17	\$1,483.49		\$381.05	
786	3821	Stauff	John	\$113.93	\$16.79	\$130.72	\$113.93		\$41.03	
787	3737	Stayton	William	\$119.03	\$17.55	\$136.57	\$119.03		\$38.35	
791	3695	Stern	Robert	\$292.29	\$43.08	\$335.37	\$292.29		\$37.74	
793	3872	Stockton	Clarence	\$1,336.84	\$197.06	\$1,533.89	\$1,336.84		\$35.15	
796	102400	Talley	George	\$301.76	\$44.48	\$346.24	\$301.76		\$339.27	
798	3338	Tarragano	Stephen	\$1,370.43	\$202.01	\$1,572.43	\$1,370.43		\$111.50	
804	3720	Terry	James	\$937.23	\$138.15	\$1,075.38	\$937.23		\$310.40	
805	3726	Thomas	Scott	\$2,673.14	\$394.03	\$3,067.17	\$2,673.14		\$520.33	
809	27963	Thompson	Michael	\$6,744.25	\$994.13	\$7,738.38	\$7,044.25		\$1,143.84	Mich
820	3207	Tucker	Kenlon	\$2,873.20	\$423.52	\$3,296.72	\$2,873.20		\$643.76	

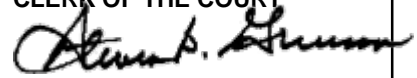
DOL UNCLAIMED

	Total Lower Tier Minimum Wages Owed 7/1/2007 - 12/31/2015 After Set Off and Over \$10.00							DOL Unclaimed	Drivers Terminated Prior to 2010
2	EE Number	Last Name	First Name	Interest from 1/1 2016 through 6/30/2018	Total with Interest	Total 2007- 2015 Shortage	Set Off From USDOL Settlement		
822	3679	Tullao	Isaac	\$411.83	\$60.71	\$472.54	\$411.83	\$158.27	
824	3686	Tyler	Christopher	\$267.85	\$39.48	\$307.33	\$267.85	\$62.75	
826	3612	Ullah	Mohammad	\$90.03	\$13.27	\$103.30	\$90.03	\$52.44	
827	3073	Urban	David	\$319.32	\$47.07	\$366.38	\$319.32	\$667.24	
828	3792	Urbanski	Anthony	\$1,411.23	\$208.02	\$1,619.25	\$1,411.23	\$81.44	
829	3668	Valdes	Lazaro	\$162.21	\$23.91	\$186.12	\$162.21	\$163.98	
831	3640	Vanluven	RJ	\$1,726.16	\$254.44	\$1,980.60	\$1,726.16	\$661.10	
833	3710	Vences	Alfredo	\$839.90	\$123.81	\$963.71	\$839.90	\$119.70	
837	3796	Vongthep	Christopher	\$2,710.64	\$399.56	\$3,110.20	\$2,710.64	\$74.61	
839	3842	Wagg	John	\$221.46	\$32.64	\$254.10	\$221.46	\$93.91	
840	3776	Wakeel	Daud	\$679.94	\$100.23	\$780.16	\$679.94	\$239.27	
842	3820	Wallace	Roy	\$3,681.35	\$542.65	\$4,224.00	\$3,681.35	\$509.98	
847	3578	Weiss	Matthew	\$60.25	\$8.88	\$69.13	\$60.25	\$72.59	
850	3632	Weldu	Berhane	\$266.45	\$39.28	\$305.73	\$266.45	\$41.71	
860	3611	Williams	Danny	\$273.88	\$40.37	\$314.25	\$273.88	\$113.10	
863	3608	Wilson Jr.	Mose	\$3,332.43	\$491.21	\$3,823.64	\$3,332.43	\$457.88	
867	3623	Wolde	Hailemariam	\$385.93	\$56.89	\$442.81	\$385.93	\$87.60	
868	3603	Woldeghebriel	Berhane	\$1,037.22	\$152.89	\$1,190.11	\$1,037.22	\$110.86	
871	3840	Wondired	Eshetu	\$423.24	\$62.39	\$485.63	\$423.24	\$96.19	
872	3910	Wong	Jorge	\$2,325.07	\$342.72	\$2,667.79	\$2,325.07	\$42.15	
874	3706	Woodall	Charles	\$610.19	\$89.94	\$700.13	\$610.19	\$218.14	
877	108239	Wright	Edward	\$744.31	\$109.71	\$854.02	\$744.31	\$116.50	
880	108389	Yamaguchi	Alicia	\$3,089.15	\$455.35	\$3,544.50	\$3,089.15	\$132.13	
881	3852	Yepiz-Patr	Ubaldo	\$18.78	\$2.77	\$21.54	\$18.78	\$23.90	
882	3472	Yesayan	Razmik	\$387.19	\$57.07	\$444.26	\$387.19	\$28.42	
883	3691	Yihdego	Abdulkadir	\$642.61	\$94.72	\$737.33	\$642.61	\$81.13	
884	3633	Yimer	Yidersal	\$643.72	\$94.89	\$738.61	\$643.72	\$213.28	
885	2081	Younes	Ahmed	\$228.31	\$33.65	\$261.96	\$228.31	\$46.27	
887	3824	Zabadneh	Randa	\$167.13	\$24.64	\$191.77	\$167.13	\$55.47	
888	30374	Zafar	John	\$605.99	\$89.33	\$695.32	\$605.99	\$34.22	
890	2273	Zawoudie	Masfen	\$2,656.70	\$391.61	\$3,048.31	\$2,656.70	\$336.24	



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OPPM

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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 23, 2022
9:30 a.m.

OPPOSITION TO PLAINTIFFS' MOTION FOR ENTRY OF MODIFIED
AWARD OF PRE-JUDGMENT ATTORNEY'S FEES AS PROVIDED FOR BY
REMITTITUR

Defendants, by and through their attorneys of record, ESTHER C. RODRIGUEZ, ESQ., of
RODRIGUEZ LAW OFFICES, P.C., and JAY A. SHAFER, ESQ., of CORY READE DOWS AND SHAFER,
hereby submit this Opposition to the relief requested in Plaintiffs' Motion for Entry of a Modified
Award of Pre-Judgment Attorney's Fees. This Opposition is based upon NRCP 56(c); the Points and
Authorities herein; *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 455 P.2d 31 (1969) and *Beattie*

1 v. *Thomas*, 99 Nev. 579, 668 P.2d 268 (1983).

2 **POINTS AND AUTHORITIES**

3 As this Court is aware, the prior judicial officer's (Hon. Kenneth Cory) decision and order in
4 this matter was reversed by the Nevada Supreme Court on several grounds due to serious errors; and
5 remanded to this Court for new determinations. *A Cab, LLC v. Michael Murray*, 137 Nev. Adv. Op.
6 84 (Dec 30, 2021) (hereinafter "NSC Order").

7 These reversals include errors in tolling a statute of limitations¹; a misunderstanding of the
8 Nevada Constitution's notice requirements²; a failure to determine an appropriate Defendant³;
9 engaging in an abuse of discretion in awarding excessive costs⁴, including those of the experts; and
10 an error in the determination to award excessive attorney's fees.⁵

11 Of note is that the Nevada Supreme Court has not only reversed the attorney's fees awarded
12 to Plaintiffs once in this referenced decision, but again more recently in its outright denial of
13 Plaintiffs' request for an award of fees. Nevada Supreme Court, Case No. 77050, *Order Denying*
14 *Motion*, filed February 3, 2022, **Exhibit 1**. In denying Plaintiff's request for attorney fees, the
15 Nevada Supreme Court noted that while the Nevada Constitution does allow for an award of
16 reasonable attorney's fees, "the determination of a 'reasonable' attorney fee involves questions of
17 fact." *Order*, p. 1, citing *Musso v. Binick*, 104 Nev. 613, 615, 764 P.2d 477, 478 (1988).

18 Here, the facts abound, particularly as to what any future judgment will be and what the final
19 result will be. A major determination for this Court's consideration in any award of attorney's fees is

21 ¹ NSC Order, p. 14.

22 ² NSC Order, p. 13.

23 ³ NSC Order, p. 32: The District Court erred "*without taking evidence on what corporate*
24 *entities existed and were actually liable for the judgment.*"

25 ⁴ NSC Order, p. 23, citing *Village Builders 96, L.P. v. U.S. Labs., Inc*, 121 Nev 261, 276,
26 112 P.3d 1082, 1092 (2005): "*A district court's decision regarding an award of costs will not*
27 *be overturned absent a finding that the district court abused its discretion.*" In this present case,
the Nevada Supreme Court has chosen to overturn the district court's award of costs.

28 ⁵ NSC Order, p. 24: "the amount of the attorney fees must be reconsidered for
reasonableness, and we therefore reverse and remand the award of attorney fees."

1 **“the result.”** See *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 455 P.2d 31, 33 (1969) outlining
 2 this essential element for consideration:

3 Before discussing the separate counts, it seems advisable that we state the wellknown
 4 basic elements to be considered in determining the reasonable value of an attorney's
 5 services. . .

6 (4) the result: whether the attorney was successful and what benefits were derived.

7 See, 7 C.J.S. Attorney and Client § 191 a. (2), p. 1080 et seq.; 5 Am.Jur., Attorneys at
 8 Law, section 198. Cf. *Ives v. Lessing*, 19 Ariz. 208, 168 P. 506. Furthermore, good
 9 judgment would dictate that each of these factors be given consideration by the trier
 10 of fact and that no one element should predominate or be given undue weight."

11 There cannot be a determination of what is a “reasonable” fee, until a final result regarding
 12 the entry of a future judgment is determined. This instruction was clear in the NSC Order that a
 13 determination regarding a fee must be made by the district court in light of the remanded issues.
 14 And yet, here come Plaintiffs again “jumping the gun” in asking the Court to engage in error by
 15 entering an award for fees when at this point there cannot even be a determination as to a proper
 16 judgment!

17 There can be no award of attorney’s fees until a final judgment is entered. Likewise, that
 18 final judgment cannot be entered until the numerous unresolved issues are addressed, as briefed in
 19 Defendants’ Opposition to Plaintiffs’ request for entry of a modified judgment; as well as in
 20 Defendants’ Motion to Stay; and Defendants’ Motion for Declaratory Order. Any entry of a future
 21 judgment is dependent upon:

- 22 1. A decision by the Nevada Supreme Court in Plaintiffs’ appeal of *Jasminka Dubric v.*
 23 *A Cab, LLC et.al.*, District Court Case No. A721063, Nevada Supreme Court Case
 24 No. 83492. An appeal in which Plaintiffs themselves are seeking an order to state
 25 that the settlements and final order in *Dubric* will not affect any future judgment
 26 entered here. A determination which will affect the result herein.
- 27 2. A decertification of the time periods as specified in both the NSC’s remand and as
 28 supported in the record. Those time periods are prior to October 8, 2010; as well as

the time periods following June 26, 2014. The claimants contained within these time periods (approximately 90 claimants) must be excluded and notified of their exclusion by Plaintiffs' counsel. Further, all claims for all claimants during these time periods must be decertified. A determination which will affect the result herein.

3. Corrections of the numerous errors contained in the spreadsheets and as briefed and detailed in the attached exhibits to Defendants' opposition to entry of modified judgment. A determination which will affect the result herein.

4. The existing claimants as well as the "ghost" claimants in *Perez v. A Cab*, USDC Case No. 2:14-cv-1615 must be addressed before entry of judgment. These nonexistent/nonparticipatory claimants are comprised of another 243 claimants. A determination which will affect the result herein.

5. A determination and an order addressing who or what entity will be named in the judgment.

Clearly, a judgment naming "To Be Determined" as a Defendant cannot be entered by this Court. A determination which will affect the result herein. Plaintiffs are simply rushing this Court to enter both a judgment and a fee award for "890 claimants" which cannot be accomplished without engaging in error and by disregarding all of the outstanding issues.

When the fog is cleared by addressing these predominating issues, the reality is that there are not 890 valid claims nor claimants. More importantly and for purposes of this motion, the request for attorney's fees is presently based upon a result for all of these 890 claimants and claims, which is a false base. These are unsupportable claims, and upon which an award of fees cannot be "reasonable."

This Court must deny Plaintiffs' motion. Plaintiffs failed to meet the requirements of NRCP 56 in asking for entry of a new judgment, and did not move under any other rule. This present request for an award of fees is dependent upon the court entering a new judgment for the claim itself, which respectfully cannot be accomplished without a determination by the high court on the pending appeal and the district court addressing the other items detailed herein.

By Order of the NSC, the prior award of attorney fees was unreasonable and must be

1 reconsidered. Let us be clear that the Nevada Supreme Court reversed and remanded the finding and
2 the amount of the attorney fees. Secondly, in refusing to uphold the prior outrageous and
3 unsupported award of fees, the fourth paragraph of the Nevada Supreme Court's reversal clearly
4 states - "the attorney fees award must be reconsidered for reasonableness." *Order*, p. 3. In other
5 words, the prior award was not reasonable.

6 **CONCLUSION**

7 Based upon the foregoing, Plaintiffs' motion and errata must be denied in their entirety.

8 DATED this 2nd day of March, 2022.

9 **RODRIGUEZ LAW OFFICES, P. C.**

10
11 /s/ Esther C. Rodriguez, Esq.
12 Esther C. Rodriguez, Esq.
13 Nevada State Bar No. 006473
14 10161 Park Run Drive, Suite 150
15 Las Vegas, Nevada 89145
16 *Attorneys for Defendants*
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 2nd 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
Co-Counsel for Plaintiffs

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

003793

003793

EXHIBIT 1

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.

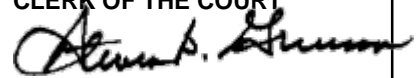
cc: Hon. Kenneth C. Cory, District Judge
Rodriguez Law Offices, P.C.
Cory Reade Dows & Shafer
Hutchison & Steffen, LLC/Las Vegas
Leon Greenberg Professional Corporation
Eighth District Court Clerk

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OPPM

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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 23, 2022
9:30 a.m.

**OPPOSITION TO PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEY'S FEES ON APPEAL**

Defendants, by and through their attorneys of record, ESTHER C. RODRIGUEZ, ESQ., of
RODRIGUEZ LAW OFFICES, P.C., and JAY A. SHAFER, ESQ., of CORY READE DOWS AND SHAFER,
hereby submit this Opposition to the relief requested in Plaintiffs' Motion for an award of fees on
appeal. This Opposition is based upon the order already issued by the Nevada Supreme Court
denying Plaintiffs' request for attorneys fees on appeal, *Order Denying Motion* issued by Nevada
Supreme Court on February 3, 2022 (**Exhibit 1**); Nevada Rule of Appellate Procedure 38; the Points

and Authorities herein; *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 455 P.2d 31 (1969) and *Beattie v. Thomas*, 99 Nev. 579, 668 P.2d 268 (1983).

POINTS AND AUTHORITIES

Plaintiffs are seeking additional fees on top of those that have already been stricken by the Nevada Supreme Court as unreasonable in its decision issued on December 30, 2021, *A Cab, LLC v. Michael Murray*, 137 Nev. Adv. Op. 84 (Dec 30, 2021) (hereinafter “NSC Order”). In that decision, the prior judicial officer’s (Hon. Kenneth Cory) decision and order in this matter was reversed by the Nevada Supreme Court on several grounds due to serious errors; and remanded to this Court for new determinations, including the exorbitant attorneys’ fees.

The reversals in that decision alone address the district court’s errors in tolling a statute of limitations¹; a misunderstanding of the Nevada Constitution’s notice requirements²; a failure to determine an appropriate Defendant³; engaging in an abuse of discretion in awarding excessive costs⁴, including those of the experts; and the error in the determination to award excessive attorney’s fees.⁵

The decisions entered into by the District Court were at the request of the Plaintiffs’ motion practice. These decisions have been reversed and remanded. Despite these reversals, Plaintiffs then unabashedly proceeded to ask the Nevada Supreme Court to award them attorney fees for their time defending these decisions which have been reversed and remanded. To no surprise -- the Nevada Supreme Court denied Plaintiffs’ Motion for fees on appeal on February 3, 2022. Nevada Supreme

¹ NSC Order, p. 14.

² NSC Order, p. 13.

³ NSC Order, p. 32: The District Court erred “*without taking evidence on what corporate entities existed and were actually liable for the judgment.*”

⁴ NSC Order, p. 23, citing *Village Builders 96, L.P. v. U.S. Labs., Inc*, 121 Nev 261, 276, 112 P.3d 1082, 1092 (2005): “*A district court’s decision regarding an award of costs will not be overturned absent a finding that the district court abused its discretion.*” In this present case, the Nevada Supreme Court has chosen to overturn the district court’s award of costs.

⁵ NSC Order, p. 24: “the amount of the attorney fees must be reconsidered for reasonableness, and we therefore reverse and remand the award of attorney fees.”

Court, Case No. 77050, *Order Denying Motion*, filed February 3, 2022, **Exhibit 1**.

1. Plaintiffs' request has already been denied by the Court "in the better position" to decide the fee issue, in the words of Plaintiffs.

In their motion to the Nevada Supreme Court seeking the same relief now sought, Plaintiffs argued to the Nevada Supreme Court the same arguments contained herein, namely that they are entitled to fees under the Nevada Constitution automatically for any work engaged in. Such a position is not supported by any caselaw, precedent, and clearly not the intent of the Nevada Constitution to provide a blanket free-for-all frenzy for fees. To the contrary, there are legal standards, rules, and cases which guide the award of any attorney fees in the civil arena. Plaintiffs' attempts to manipulate the Constitution otherwise is an abuse of process and a perversion of the Constitution itself.

In its recent decision, the Nevada Supreme Court made clear that it was not modifying its appellate procedures or its instructions to the district court: "Respondent's request for a modification of the mandate to include instructions based on NRAP 37(b) is denied." **Exhibit 1**, p. 2.

The Nevada Supreme Court had an opportunity to award attorney fees for the appeal to Plaintiffs in direct response to their request, *Respondents' Motion for An Award of Attorney's Fees and Interest*" filed January 6, 2022, **Exhibit 2**. The Nevada Supreme Court did not do so, but instead DENIED Plaintiffs' Motion. Plaintiffs had argued to the Nevada Supreme Court in their motion, under the same grounds, "pursuant to Article 15, Section 16, of Nevada's Constitution," that they were entitled to fees and were denied. Exhibit 2, p. 1. Plaintiffs even argued to the Nevada Supreme Court that they were in a better position to award any such fees: "*this Court is in a better position than the district court to evaluate the quality of respondents' counsel's appellate work.*" Exhibit 2, p. 4. Thereafter, the Court that was "in a better position" to make a decision as to Plaintiffs' fees, denied the motion for fees. Plaintiffs also argued that an instruction should be given to the district court pertaining to an award of fees - again, the Nevada Supreme Court DENIED Plaintiffs' request and declined to do so.

...

...

2. **NRAP 38, the Guiding Rule for an award of fees for an appeal, does not support an award to Plaintiffs.**

Here, the guiding rule for any award of attorney fees to a party prevailing in an appeal is Nevada Rule of Appellate Procedure 38 - "Frivolous Civil Appeals - Damages and Costs" which reads:

(a) **Frivolous Appeals; Costs.** If the Supreme Court or Court of Appeals determines that an appeal is frivolous, it may impose monetary sanctions.

(b) **Frivolous Appeals; Attorney Fees as Costs.** When an appeal has frivolously been taken or been processed in a frivolous manner, when circumstances indicate that an appeal has been taken or processed solely for purposes of delay, when an appeal has been occasioned through respondent's imposition on the court below, or whenever the appellate processes of the court have otherwise been misused, the court may, on its own motion, require the offending party to pay, as costs on appeal, such attorney fees as it deems appropriate to discourage like conduct in the future. **Nevada Rule of Appellate Procedure 38.**

Firstly, Plaintiffs were not the prevailing party - the district court's entry of judgment has been reversed and remanded on the numerous errors detailed above. Secondly, the reversal and remand corroborate that this was not a frivolous appeal; and the Nevada Supreme Court has clearly not found as such.

In denying Plaintiff's request for attorney fees, the Nevada Supreme Court noted that while the Nevada Constitution does allow for an award of reasonable attorney's fees, "the determination of a 'reasonable' attorney fee involves questions of fact." Exhibit 1, *Order*, p. 1, *citing Musso v. Binick*, 104 Nev. 613, 615, 764 P.2d 477, 478 (1988). Here, the facts abound, particularly as to what any future judgment will be and what the final result will be. A major determination for this Court's consideration in any award of attorney's fees is "**the result**." See *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 455 P.2d 31, 33 (1969) outlining this essential element for consideration:

Before discussing the separate counts, it seems advisable that we state the wellknown basic elements to be considered in determining the reasonable value of an attorney's

1 services. . .

2 (4) the result: whether the attorney was successful and what benefits were derived.

3 See, 7 C.J.S. Attorney and Client § 191 a. (2), p. 1080 et seq.; 5 Am.Jur., Attorneys at

4 Law, section 198. Cf. Ives v. Lessing, 19 Ariz. 208, 168 P. 506. Furthermore, good

5 judgment would dictate that each of these factors be given consideration by the trier

6 of fact and that no one element should predominate or be given undue weight."

7 Here, the result is that the case has been reversed and remanded on several overriding issues.

8 **3. Plaintiffs cannot be due any award as it was their motion practice which caused the**
9 **need for appeal.**

10 Logically, Plaintiffs cannot be due any award of attorneys fees as it was their motion practice
11 which induced the District Court into entering the erroneous orders which have now been reversed
12 and remanded.

13 The Nevada Constitution does not stand for the proposition of awarding fees when the
14 movant is the guilty party in escalating the unnecessary fees in the first place. The exorbitant fees
15 incurred in the appeal in this matter are the direct result of an overwhelming appellate record (over
16 52 volumes containing over 10,500 pages) filled with Plaintiffs' unnecessary discovery motions,
17 repeated harassing requests for documents admittedly never even viewed by anyone, and duplicative
18 re-hearings whenever Plaintiffs were denied on issues. It is Defendants who have been harmed and
19 should be awarded their fees not only for the costly appeal, but clearly for having to respond to this
20 unnecessary and baseless motion.

21 As a result of the District Court's erroneous path persuaded by Plaintiffs, Defendants were
22 forced to defend a claim for alleged under-payments as far back as July 1, 2007. These District
23 Court rulings completely changed the disposition of the litigation with neither party wanting to or
24 having the financial wherewithal to fund an analysis of thousands of tripsheets dating back to 2007.
25 The back-dated timeframe was far outside of any record keeping requirements; and there was no way
26 for A Cab to anticipate in 2007 that a lawsuit would be filed 5 years later in 2012 to enforce a clause
27 that was interpreted by this Court in 2014.

28 . . .

1 With the Nevada Supreme Court's decision now reversing that course and limiting the
2 timeframe, a specific calculation of any alleged underpaid hours is manageable (for both parties) and
3 can be based upon a reality of hours worked, rather than a random guess. Unfortunately, in order to
4 arrive at to this point in time has cost Appellants hundreds of thousands of dollars in litigation fees
5 and costs, the majority of which are not recoverable.

6 In light of the Nevada Supreme Court's decision reversing and remanding on all of these
7 issues, Plaintiffs' request for attorney's fees in the amount of \$63,760 is unreasonable, not supported,
8 and should be denied in its entirety. The Nevada Constitution is not a blanket approval to override
9 all other considerations of "reasonableness."

10 By Order of the NSC, the prior award of attorney fees was unreasonable and must be
11 reconsidered. The Nevada Supreme Court reversed and remanded the finding and the amount of the
12 attorney fees. In refusing to uphold the prior outrageous and unsupported award of fees, the fourth
13 paragraph of the Nevada Supreme Court's reversal clearly states - "the attorney fees award must be
14 reconsidered for reasonableness." *Order*, p. 3. In other words, the prior award was not reasonable.
15 Now for the Plaintiffs to ask for fees on top of a previously unreasonable award is truly beyond the
16 boundaries. Plaintiffs are simply continuing to run up attorneys fees under the ill conceived notion
17 that everything they do will be on the Defendants' dime; and to force Defendants to continue to incur
18 fees in responding. Defendants respectfully request leave to submit a memorandum of costs and fees
19 incurred in responding to this frivolous motion.

20 ...

21 ...

22 ...

23 ...

24 ...

25 ...

26 ...

27 ...

28 ...

CONCLUSION

Based upon the foregoing, Plaintiffs' motion for fees on appeal must be denied in its entirety. Defendants respectfully request leave to submit a memorandum of costs and fees incurred in responding to this frivolous motion.

DATED this 3rd 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 3rd 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
Co-Counsel for Plaintiffs

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

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EXHIBIT 1

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

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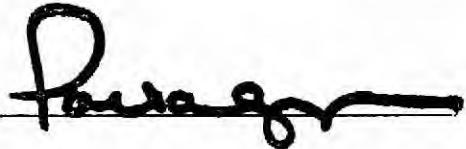
appeal is denied without prejudice to respondents' right to raise this motion in the district court.

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

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EXHIBIT 2

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EXHIBIT 2

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 others
similarly situated,

Respondents.

)
) SUPREME COURT
) CASE # 77050
) Electronically Filed
) Jan 06 2022 01:50 p.m.
) Elizabeth A. Brown
) Clerk of Supreme Court
) District Court
) Case No.: A-12-669926-C
)
) **RESPONDENTS' MOTION FOR**
) **AN AWARD OF ATTORNEY'S**
) **FEES AND INTEREST**
)
)
)

Pursuant to NRAP Rules 27 and 37(b) respondents file this motion seeking an award of attorney's fees for this appeal or an instruction that such an award of fees be appropriately made by the district court pursuant to Article 15, Section 16, of Nevada's Constitution and an instruction in the mandate issued by this Court that post-judgment interest be payable as allowed by law on the judgment and post-judgment award of attorney's fees to be entered by the district court, as modified by this Court's judgment, from the dates of their original entry in the district court, August 21, 2018, and February 6, 2019, respectively.

ON THE REQUEST FOR ATTORNEY'S FEES

I. **Whether an appropriate award of attorney's fees on this appeal should be determined by this court or the district court is not clearly established.**

Respondents are current and former employees of appellant who secured a district court judgment under Article 15, Section 16, of the Nevada Constitution, the Minimum Wage Amendment (the "MWA"). Subsection B of the MWA states "[a]n employee who prevails in any action to enforce this section shall be awarded his or her reasonable attorney's fees and costs." This Court's Judgment of December 30, 2021, affirmed most of the district court's judgment and reversed the portion of that judgment predating the MWA's two-year statute of limitations. This Court has not previously ruled on how attorney's fees should be awarded in appeals of judgments rendered under the MWA and whether such attorney fee awards are within the jurisdiction of this Court or the district court after remittitur. Respondents bring this motion to ensure they present their request for an award of attorney fees in connection with this appeal to the proper court.

A. **This Court has previously ruled that certain attorney fee awards involving appeals should be determined by the district court after remittitur.**

When a party requests an award of attorney fees on an appeal and for

post-appeal judgment enforcement motions in the district court, pursuant to a right provided by contract, this Court has held that fee request should be decided by the district court. *See, Musso v. Binick*, 764 P.2d 477, 478 (Nev. Sup. Ct. 1988). Nevada's offer of judgment fee-shifting provisions, NRCF Rule 68 and NRS 17.115, also provide for awards of attorney fees on appeal and this Court has directed such attorney fees be determined by the district court. *See, In re Estate and Living Trust of Miller*, 216 P.3d 239, 243 (Nev. Sup. Ct. 2009).

B. This Court may find good reason exists for it, and not the district court, to determine the amount of attorney's fees to be awarded on this MWA appeal.

There is no uniform approach to the handling of appellate attorney's fee awards under fee shifting statutes such as the MWA. *Compare, Cummings v. Connell*, 402 F.3d 936, 947-48 (9th Cir. 2005) and Ninth Circuit Rule 39-1.8 (district court has no authority to award fees on appeal absent a transfer order from the Ninth Circuit Court of Appeals authorizing it to do so) and *Souza v. Southworth*, 564 F.2d 608, 613-614 (1st Cir. 1977) (district court has authority to award attorney's fees on appeal). *See, also, Yaron v. Township of Northampton*, 963 F.2d 33, 36 (3rd Cir. 1992) (collected cases on conflicting holdings of the Courts of Appeal on the issue).

As recognized in *Souza*, even though the district court may be in a better position to make certain factual findings in connection with an attorney fee award, it is also true “...that a court of appeals is in a better position to assess the importance and quality of appellate work...” 564 F.2d at 613-14. This Court may find it preferable to adopt the approach of the Ninth Circuit, making attorney fee awards on certain appeals directly and directing others be made by the district court, depending on the circumstances. Its decisions in both *Musso* and *Miller* involved a need for attorney’s fees to be determined, and findings of fact made, for work performed in the district court and not just for appellate work. *Musso*, 764 P.2d at 478 (fees sought “for services performed in district court in pursuing post-appeal motions to enforce judgment”), *Miller*, 216 P.3d at 243 (“On remand, the district court should award reasonable post-rejection [of offer of judgment] fees incurred at the district court and appellate levels...”)

This motion concerns an award of attorney’s fees solely for the respondents’ counsel’s work performed in this Court and in connection with this appeal. It involves no fact-finding on any proceedings taken in the district court. As discussed in *Souza*, this Court is in a better position than the district court to evaluate the quality of respondents’ counsel’s appellate work.

This litigation has also been highly contentious, spawning four different appeals (two of which remain pending) and three writ petitions.¹ Given this history, there is a high probability an appeal will be taken from any district court attorney's fee award for this appeal. Finality and judicial efficiency may be better served by having this Court directly make that fee determination.

C. If this Court wants to determine the amount of attorney's fees to award on this appeal appropriate documentation is provided.

Respondents' counsel submits a declaration, Ex. "A," with this motion detailing the basis of its request for an attorney's fee award of \$63,760 in connection with this appeal. As detailed therein, that request is based upon an appropriate reasonable hourly rate (\$400) and an expenditure of hours of time (159.4) that were contemporaneously recorded. That request also excludes from such fee calculation time spent preparing this motion, travel time, all post-oral argument time, and other amounts of time.

¹ In addition to this appeal: *A Cab Taxi Service v. Murray*, No. 71691 (argued *en banc* and resolved); *Murray v. A Cab Taxi Service*, No. 81641 (dismissed on motion); *Murray v. A Cab Taxi Service*, No. 82539 (fully briefed and pending); *Murray v. Dubric*, No. 83492 (appeal of related case judgment, not yet briefed); *A Cab, LLC v. Eighth Jud. Dist. Ct.*, No. 733326 (writ petition, denied without answer); *Murray v. Eighth Jud. Dist. Ct.*, No. 75877 (writ petition, answer directed, dismissed without prejudice as moot); and *Murray v. Eighth Jud. Dist. Ct.*, No. 82126 (writ petition, answer directed, relief denied with issues to be addressed in related case judgment appeal No. 83492).

ON THE REQUEST FOR INTEREST

Pursuant to NRAP 37(b) “[i]f the 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.” The Court’s Opinion, which directs a modified money judgment be entered by the district court, contains no such instruction and respondents’ counsel is unsure what NRAP 37(b) instructions the mandate (remittitur) will contain.

This Court has modified the final judgment entered by the district court on August 21, 2018, by reversing the portion of such judgment “as to damages for claims outside of the two-year statute of limitations” and otherwise affirming the district court’s summary judgment decision that resulted in the final judgment. It has remanded the case to the district court for further proceedings consistent with its opinion. Those further proceedings will also involve a re-examination of the award of attorney’s fees and costs set forth in the district court’s order of February 6, 2019. Such re-examination will consider whether: (1) Costs previously awarded should be reduced for the reasons stated in the Opinion; (2) Whether the amount of the attorney’s fees award should be reduced based on the reversal of the portion of the district court’s summary judgment decision concerning the damage claims outside of

the two-year statute of limitations.

Respondents request that the Court's mandate (remittitur) instruct the district court that the new judgment amount entered by the district court on the plaintiffs' damages be subject to post-judgment interest from the date of the original judgment's entry in the district court, August 21, 2018. They also request the district court's order reconsidering the amount of attorney's fees and costs be subject to post-judgment interest from the date of the original district court order granting that award, February 6, 2019. Such post-judgment interest is substantial, in excess of \$120,000 for the plaintiffs on their reduced damages amount (the reduced damages forming the basis for the revised judgment will be approximately \$675,000). Such post-judgment interest is also substantial, very likely over \$100,000, on the attorney's fees and costs award even as reduced in a fashion consistent with the Court's Opinions.

Failing to include the requested NRAP 37(b) mandate (remittitur) instruction on the award of interest will deprive respondents, low-wage workers owed unpaid minimum wages, of over three years of substantial accumulated post-judgment interest. It will also deprive their counsel of a similar amount of accrued interest. It would be unjust to allow appellant to

avoid payment of that accrued interest, at least in a case such as this where the bulk of the original judgment amount (over 69%) and attorney fee and cost award was sustained on appeal.

CONCLUSION

Wherefore, the Court should grant the motion for an award of attorney's fees to respondents' counsel for this appeal or alternatively direct the district court after remittitur to make such an award. The Court should also grant the motion to have the mandate (remittitur) instructions pursuant to NRAP 37(b) require the district court's determinations of damages and attorneys fees and costs upon remand to accrue post-judgment interest from August 21, 2018, and February 6, 2019, respectively.

Dated: January 6, 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
Attorney for Respondents

CERTIFICATE OF SERVICE

I certify that on January 6, 2022, I had served a copy of the foregoing MOTION upon all counsel of record by EFLEX system which served all parties electronically.

Dated this 6th day of January, 2022

/s/ LEON GREENBERG

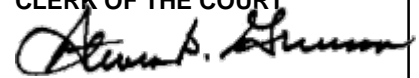
Leon Greenberg

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1 **RESP**

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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.

21
22
23
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.
27
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MEMORANDUM OF POINTS AND AUTHORITIES

ARGUMENT

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

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

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

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

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.
25
26
27
28

B. The impact of the *Dubric* judgment on the plaintiffs' derivative claims against defendant Nady and defendants' associates is arguably unclear; but that ambiguity is irrelevant to the final judgment rendered against A Cab Series LLC in this case.

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

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

² All of these claims are derivative from A Cab Series LLC's liability to the plaintiffs and its inability to satisfy that liability (either because it is Nady's alter ego or fraudulent conveyances have occurred). Plaintiffs contend that *Dubric*, lacking subject matter jurisdiction over A Cab Series LLC's liability to the plaintiffs, also cannot possess subject matter jurisdiction over such wholly derivative claims even though they were not resolved by the August 21, 2018, final judgment. In addition, the class representative plaintiff in *Dubric*, Jasminka Dubric, is *not* a class member or 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

1
2 PROOF OF SERVICE
3

4 The undersigned certifies that on March 4, 2022 she served the within:

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

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

8 by court electronic service to:

9 TO:

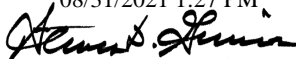
10 Esther C. Rodriguez, Esq.
11 RODRIGUEZ LAW OFFICES, P.C.
12 10161 Park Run Drive, Suite 150
13 Las Vegas, NV 89145
14

15 /s/ Ruthann Devereaux-Gonzalez

16 Ruthann Devereaux-Gonzalez
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003829

EXHIBIT "A"



CLERK OF THE COURT

ORDR

MARK J. BOURASSA, ESQ.

Nevada Bar No. 7999

VALERIE S. GRAY, ESQ.

Nevada Bar No. 14716

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Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

JASMINKA DUBRIC, individually and on behalf)
of those similarly situated,

Plaintiff,

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.

Case No.: A-15-721063-C

Dept. No.: XXV

**ORDER APPROVING CLASS ACTION
SETTLEMENT, AWARDED ATTORNEY
FEES AND COSTS, AND AWARDED
INCENTIVE PAYMENTS**

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 Intervenors 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 Intervenors, 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

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

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

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

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

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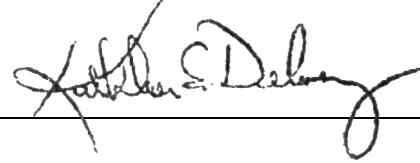
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17. **Termination.** If the Settlement is terminated as provided in the Settlement Agreement, then this Order (and any orders of the Court relating to the Settlement) shall be vacated, rendered null and void and be of no further force or effect, except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

IT IS SO ORDERED.

Dated this 31st day of August, 2021



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

Dubric v. A Cab, LLC, et al.
Case No. A-15-721063- C

EXHIBIT 1

Persons Excluded from Class Pursuant to Opt-Out Request

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

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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.
Cherry

Parraguirre, J.
Parraguirre

Stiglich, J.
Stiglich

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

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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

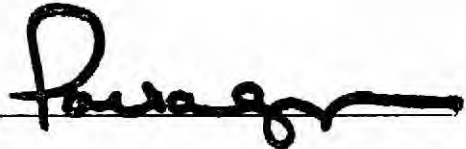
appeal is denied without prejudice to respondents' right to raise this motion in the district court.

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

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EXHIBIT "D"

CLERK OF THE COURT

[illegible]

Time of Hearing: 9:00 a.m.

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

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

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

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

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1 Therefore, the motion is DENIED.

2 **IT IS SO ORDERED.**

3 Dated this ____ day of _____, 2021.

4 Dated this 16th day of November, 2021

5 
6 Hon. Kathleen Delaney

7 07B E26 5AAE 4379
8 Kathleen E. Delaney
District Court Judge

9 Submitted by:

10 LEON GREENBERG PROFESSIONAL CORP.

11 */s/ Leon Greenberg*

12 _____
13 Leon Greenberg, Esq. NSB 8094
14 LEON GREENBERG PROFESSIONAL CORP.
15 2965 S. Jones Boulevard - Ste. E-3
16 Las Vegas, NV 89146
17 Tel (702) 383-6085
18 Attorney for the Intervenors
19 Approved as to form and content:

20 By: */s/ Valerie Gray*
21 _____
22 Mark J. Bourassa, Esq. NSB 7999
23 Valerie S. Gray, Esq. NSB 14716
24 2350 W. Charleston Blvd - Suite 100
25 Las Vegas, Nevada 89117
26 Tel (702) 851-2180
27 Attorney for Plaintiff

28 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

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EXHIBIT "E"

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

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

9 Attorneys for Plaintiffs

**DISTRICT COURT
CLARK COUNTY, NEVADA**

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

14 Plaintiffs,)

15 vs.)

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

18 Defendants.)

Case No.: A-12-669926-C

Dept.: 2

ATTORNEY'S DECLARATION

DECLARATION

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

22 1. I am one of the attorneys representing the plaintiffs in this matter and offer
 23 this declaration in support of plaintiffs' response in opposition to defendants' motion
 24 on order shortening time filed on February 28, 2022, seeking a stay of this case and
 25 plaintiffs' counter-motion for an award of attorney's fees for opposing that motion.
 26
 27
 28

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
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
2	Jan	52238	\$16.79	14,124	\$237,142	38114	\$17.91	\$682,622	\$919,763.70	18881	\$17.36	6,586	\$114,333	122
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	175
4	March	22242	\$17.15	7,004	\$120,119	15238	\$18.16	\$276,722	\$396,840.68	47308	\$18.68	11,008	\$205,629	363
5	April	0	\$0.00	0	\$0	0	\$0.00	\$0	\$0.00	62112	\$18.86	12,100	\$228,206	500
6	May	0	\$0.00	0	\$0	0	\$0.00	\$0	\$0.00	64475	\$18.33	12,313	\$225,697	521
7	June	11572	\$17.67	9,274	\$163,872	2298	\$18.55	\$42,628	\$206,499.48	66711	\$17.71	11,255	\$199,326	554
8	July	21840	\$18.11	11,609	\$210,239	10231	\$18.10	\$185,181	\$395,420.09	70470	\$17.32	12,175	\$210,871	582
9	Aug	21158	\$17.72	10,062	\$178,299	11096	\$18.73	\$207,828	\$386,126.72	65238	\$17.18	11,091	\$190,543	541
10	Sept.	25779	\$17.57	10,312	\$181,182	15467	\$17.94	\$277,478	\$458,659.82	58929	\$17.97	10,042	\$180,455	488
11	Oct.	29866	\$17.82	8,999	\$160,362	20867	\$18.54	\$386,874	\$547,236.36	71954	\$17.67	11,217	\$198,204	607
12	Nov	22448	\$17.58	6,821	\$119,913	15627	\$18.87	\$294,881	\$414,794.67	59335	\$17.78	9,596	\$170,617	497
13	Dec	17147	\$17.59	5,757	\$101,266	11390	\$18.95	\$215,841	\$317,106.13	51202	\$17.96	7,922	\$142,279	432
14														
15							Total 2020:		\$4,901,266.39					Total

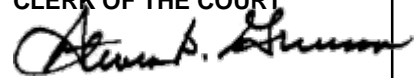
EXHIBIT 2

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
	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
1	Jan	42313	\$16.77	42,313	\$709,589	0	\$0.00	\$0	\$709,589.01	52458	\$16.97	18,494	\$313,843	33964	\$18.59
2	Feb	36184	\$16.67	36,184	\$603,187	0	\$0.00	\$0	\$603,187.28	46936	\$16.76	15,636	\$262,059	31300	\$18.59
3	March	42535	\$16.66	42,535	\$708,633	0	\$0.00	\$0	\$708,633.10	58575	\$16.88	17,728	\$299,249	40847	\$18.59
4	April	37203	\$16.70	37,203	\$621,290	0	\$0.00	\$0	\$621,290.10	51767	\$17.04	15,730	\$268,039	36037	\$18.59
5	May	43665	\$16.77	35,380	\$593,323	8285	\$17.66	\$146,313	\$739,635.70	55833	\$16.91	16,837	\$284,714	38996	\$18.59
6	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
7	July	49296	\$16.63	20,956	\$348,498	28340	\$17.42	\$493,683	\$842,181.08	47215	\$16.11	14,487	\$233,386	32728	\$18.59
8	August	50880	\$16.46	20,840	\$343,026	30040	\$17.70	\$531,708	\$874,734.40	46025	\$16.06	13,883	\$222,961	32142	\$18.59
9	Sept	50895	\$16.88	19,936	\$336,520	30959	\$18.18	\$562,835	\$899,354.30	48898	\$16.26	14,131	\$229,770	34767	\$18.59
10	Oct	51573	\$16.88	19,604	\$330,916	31969	\$18.85	\$602,616	\$933,531.17	48315	\$16.55	14,265	\$236,086	34050	\$18.59
11	Nov	48424	\$17.05	17,994	\$306,798	30430	\$18.70	\$569,041	\$875,838.70	46871	\$16.49	13,861	\$228,568	33010	\$18.59
12	Dec	41826	\$17.13	15,994	\$273,977	25832	\$18.65	\$481,767	\$755,744.02	46263	\$16.64	12,316	\$204,938	33947	\$18.59
13															
14															
15						Total Revenue 2018:			\$9,374,251.61					Total Revenue 2019	

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OPPM

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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 30, 2022
9:30 a.m.

**OPPOSITION TO PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEY'S FEES
ON APPEAL OF ORDER DENYING RECEIVER, OPPOSING MOOTED MOTION
FOR ATTORNEY'S FEES, AND FOR COSTS ON APPEAL**

Defendants, by and through their attorneys of record, ESTHER C. RODRIGUEZ, ESQ., of
RODRIGUEZ LAW OFFICES, P.C., and JAY A. SHAFER, ESQ., of CORY READE DOWS AND SHAFER,
hereby submit this Opposition to the relief requested in Plaintiffs' Motion. This Opposition is based
upon Nevada Rule of Appellate Procedure 38 and 39; the Points and Authorities herein; *Brunzell v.*
Golden Gate Nat. Bank, 85 Nev. 345, 455 P.2d 31 (1969); *Beattie v. Thomas*, 99 Nev. 579, 668 P.2d

268 (1983); and *Cadle Co. v. Woods & Erickson*, 131. N.A.R. 15, 345 P.3d 1049 (2015).

POINTS AND AUTHORITIES

1. Plaintiffs have not filed this request in the proper forum pursuant to the Nevada Rules of Appellate Procedure.

Plaintiffs are seeking an award of fees and costs for its appeal to the appellate court which resulted in a remand to this district court for review Plaintiffs' request for a receiver on the merits. Of note is that Defendants have sought *Petition for Rehearing* before the Nevada Supreme Court arguing that this district court was in fact correct in conducting a thorough review of the lengthy 9 year history of this litigation before rendering its determination to deny appointment of a receiver.

Exhibit 1, Respondents Petition for Rehearing filed March 7, 2022. It is Defendants' position that the Nevada Supreme Court's remand is incorrect pursuant to **NRAP 40**, as this Court did already consider the merits of Plaintiffs' request for a receiver before denying the request.

Defendants have argued to the Nevada Supreme Court that this District Court determined not to vacate the standing orders pertaining to appointment of a receiver, after a thorough review of the merits:

"As stated in the district court's order, Hon. Carli Kierny did conduct a review of the merits of the request, and determined there was no need to vacate the standing order of the case issued by Hon. Rob Bare and to replace it with an appointment of a receiver. The district court order states that the appellant has put forth no good cause to vacate the standing orders of her predecessors. In sum, a review of the merits was conducted in rendering this determination that there was no good cause to stray from the recommended course of a special master to provide guidance to the Court pertaining to the need for a receiver. The District Court denied Plaintiffs' motion indicating, 'The record reflects Judge Bare was careful in his decision and he did factor in the *Nelson* factors before rendering a limited stay as defendants had posted a partial security of nearly \$300,000.' Order on Plaintiffs' Motion for Appointment of Receiver, AA0870." Exhibit 1, *Petition for Rehearing*, p. 5-6.

...

1 Defendants have also highlighted to the Nevada Supreme Court that, unlike this Court, the appellate
2 court misconstrued why Plaintiffs' prior request for a receiver was "still pending."

3 "Judge Kierny was briefed, understood, and considered the reasons as to why
4 Appellants' request for a receiver was "still pending." In its decision, the [Nevada
5 Supreme] Court appears to have relied upon Appellants' description that the Special
6 Master was unable to complete his task because he passed away. The truth as
7 reflected in the record is that Appellants refused to comply with Hon. Rob Bare's
8 outstanding order that they should share in half of the Special Master's fees.

9 AA630-AA0636

10 Once Judge Bare issued his order, Appellants refused to pay the Special
11 Master. That is the only reason why the report by the Special Master remained
12 pending and was not submitted to the District Court; not that the Special Master had
13 passed away. Judge Bare's order was entered on July 17, 2020. AA630-AA0636.
14 The Special Master, George Swarts, passed away December 25, 2020. Defendants'
15 Opposition to Plaintiffs' Motion for Appointment of Receiver, p. 7 (AA0695).

16 Plaintiffs never complied with the Court's order to pay Mr. Swarts their share
17 of his fees; and therefore Mr. Swarts ceased working on the matter with good reason.
18 Id. It was Plaintiffs who initiated the original request for an independent person to
19 review the financials of the company; but when the Court ordered payment to be
20 shared, Plaintiffs dropped the request to move forward.

21 Judge Kierny understood that Appellant was simply refusing to comply with
22 the outstanding District Court order that was in place already to determine whether
23 appointment of a receiver was appropriate. A party cannot simply disregard a Court
24 order, and ask for a do-over while in contempt of an outstanding order. This is
25 exactly what occurred here." Exhibit 1, *Petition for Rehearing*, pp. 4-5.

26 This matter has only been remanded for further hearing on the merits, not an order directing
27 this district court to appoint a receiver. Further, that appellate decision itself may be reconsidered.
28 Therefore, Plaintiffs' request for fees is improper.

Nevertheless, the guiding rule for an award of fees for an appeal is NRAP 38 which mandates that Plaintiffs seek such an award from the appellate court. Plaintiffs' reliance on the Nevada Constitution for a catch-all for every time a pencil is lifted is misplaced. There is no caselaw or indication that would indicate that appeal of a post-judgment collection issue would divest the Nevada Supreme Court from addressing a request for fees. It is only because Plaintiffs know they do not meet the standard under NRAP 38 for an award; and also because they have already been denied in seeking fees from the Nevada Supreme Court. **Exhibit 2, Order Denying Motion**

2. NRAP 38 does not support an award to Plaintiffs.

NRAP Rule 38 is the relevant rule for any award of attorney fees to a party prevailing in an appeal is Nevada Rule of Appellate Procedure 38 - "Frivolous Civil Appeals - Damages and Costs" which reads:

(a) **Frivolous Appeals; Costs.** If the Supreme Court or Court of Appeals determines that an appeal is frivolous, it may impose monetary sanctions.

(b) **Frivolous Appeals; Attorney Fees as Costs.** When an appeal has frivolously been taken or been processed in a frivolous manner, when circumstances indicate that an appeal has been taken or processed solely for purposes of delay, when an appeal has been occasioned through respondent's imposition on the court below, or whenever the appellate processes of the court have otherwise been misused, the court may, on its own motion, require the offending party to pay, as costs on appeal, such attorney fees as it deems appropriate to discourage like conduct in the future. **Nevada**

Rule of Appellate Procedure 38.

Clearly, this rule does not support an award of fees as Defendants properly opposed and succeeded before the district court on numerous occasions in defeating Plaintiffs' baseless repeated requests for a receiver.

In already denying Plaintiff's request for attorney fees in the associated appeal, the Nevada Supreme Court noted that while the Nevada Constitution does allow for an award of reasonable attorney's fees, "the determination of a 'reasonable' attorney fee involves questions of fact." Exhibit 2, *Order Denying Motion*, p. 1, citing *Musso v. Binick*, 104 Nev. 613, 615, 764 P.2d 477, 478 (1988).

Here, the facts abound, particularly as to whether this district court will reverse itself and its predecessors and appoint a receiver. A major determination for this Court's consideration in any award of attorney's fees is "the result." See *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 455 P.2d 31, 33 (1969) outlining this essential element for consideration:

Before discussing the separate counts, it seems advisable that we state the wellknown basic elements to be considered in determining the reasonable value of an attorney's services. . .

(4) the result: whether the attorney was successful and what benefits were derived.

See, 7 C.J.S. Attorney and Client § 191 a. (2), p. 1080 et seq.; 5 Am.Jur., Attorneys at Law, section 198. Cf. *Ives v. Lessing*, 19 Ariz. 208, 168 P. 506. Furthermore, good judgment would dictate that each of these factors be given consideration by the trier of fact and that no one element should predominate or be given undue weight."

Here, the result is that the issue of a receiver may be remanded to this court after a rehearing or a denial of a rehearing. But such a remand is only for a hearing on the merits. That is not to say that the Plaintiffs will ultimately be a prevailing party in having a receiver appointed. In the numerous times that Defendants have defeated Plaintiffs' continued requests for this relief, it was only in the last round that Defendants finally sought attorneys fees for repeatedly having to oppose the same requested relief. It is ironic that Plaintiffs now ask for additional fees in opposing Defendants' request for attorneys' fees in prevailing below - an issue which is not moot as asserted by Plaintiffs¹. Either the Nevada Supreme Court will rehear this issue; or stand by its remand to this Court to issue another ruling regarding the appointment of a receiver. The award of fees to either party will be at the discretion of this Court.

3. The award of attorney fees is not supported as a receiver cannot be appointed due to the remanded issues.

As argued in the *Petition for Rehearing*, Plaintiffs' appeal of the denial of a receiver is moot

¹ Plaintiffs seek fees for opposing what they term a moot motion wherein Defendants sought attorney fees for repeatedly opposing the same request. The Court has not ruled on this motion.

and should not be remanded for a hearing on the merits. Plaintiffs' request for a receiver has been rendered moot by the Nevada Supreme Court's decision to partially reverse and remand the entry of summary judgment. *A Cab, LLC v. Michael Murray*, 137 Nev. Adv. Op. 84 (Dec 30, 2021) (hereinafter "*MSJ Reversal*"). Plaintiffs' motion was "for the appointment of a Receiver of the judgment debtor, A Cab Series LLC, formerly known as A Cab LLC, to aid in judgment enforcement." In the NSC's review of the entry of summary judgment in this case, they determined that the judgment must be reversed and remanded on a number of issues for further determination and findings by the district court. These reversals include a new determination of what any judgment will be after subtracting more than 3 years of claimed damages (July 1, 2007 to October 8, 2010), as well as excluding all claimants who were employed during this time period. The Court determined these years to be outside of the statute of limitations. *MSJ Reversal*, p. 32.

Secondly, the NSC also remanded for a determination of what entity would even be liable for any judgment. In the reversal and remand, the Nevada Supreme Court specifically stated that a determination had to be made as to which entity existed at the time and which bears liability for any damages that are determined. The Court stated that the District Court erred "without taking evidence on what corporate entities existed and were actually liable for the judgment." *MSJ Reversal*, p. 32.

Accordingly, Defendants have asserted to the NSC that Plaintiffs' underlying motion cannot be remanded for a hearing on the merits of appointing a receiver in aid of judgment collection against A Cab, LLC and A Cab Series, LLC when: 1) the amount of the judgment has not been determined; and 2) these named entities have not been determined to be the appropriate debtors. Defendants have requested the NSC to dismiss Plaintiffs' appeal as moot in light of its recent decision. To remand this issue for a hearing on the merits is nonsensical and a waste of judicial resources when the appellate court has already ordered the district court to make other predominant findings and determinations. One can foresee an incongruous outcome of appointing a receiver over A Cab LLC, for example; and then the District Court determining that it is not even a proper debtor.

4. Plaintiffs' Request for Costs Must be Denied As It Does Not Comply With The Requirements.

A request for costs must be supported by a Verified Memorandum of Costs pursuant to NRS

1 18.110, which must be verified by the oath of the party, or the party's attorney or agent, or by the
2 clerk of the party's attorney, stating that to the best of his or her knowledge and belief the items are
3 correct, and that the costs have been necessarily incurred in the action or proceeding. Plaintiffs have
4 altogether failed to include this as well as any supporting receipts or evidence of expenditures.

5 Further Plaintiff's motion seeks costs which they have lumped together and characterize as
6 "at least" this amount without providing adequate supporting documentation. This blatantly
7 disregards *Cadle Co. v. Woods & Erickson*, 131. N.A.R. 15, 345 P.3d 1049 (2015) which prohibits
8 some types of costs from simply being lumped together and given a single dollar figure. Justifying
9 documentation means more than just a summary in the memorandum of fees and costs. Since
10 Plaintiff failed to distinguish these amounts, they are not entitled to these costs based on the *Cadle*
11 *Co.* holding. Attempting to cure these deficiencies in a Reply will be outside of the deadlines for
12 requesting costs; and further it is improper to produce the items for the first time in a reply brief.

13 CONCLUSION

14 Based upon the foregoing, Plaintiffs' motion must be denied in its entirety.

15 DATED this 8th day of March, 2022.

16 **RODRIGUEZ LAW OFFICES, P. C.**

17
18 /s/ Esther C. Rodriguez, Esq.
19 Esther C. Rodriguez, Esq.
20 Nevada State Bar No. 006473
21 10161 Park Run Drive, Suite 150
22 Las Vegas, Nevada 89145
23 *Attorneys for Defendants*
24
25
26
27
28

1 **CERTIFICATE OF SERVICE**

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

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8
9 /s/ Susan Dillow
10 An Employee of Rodriguez Law Offices, P.C.

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Las Vegas, Nevada 89145
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EXHIBIT 1

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EXHIBIT 1

IN THE SUPREME COURT OF THE STATE OF NEVADA

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

Electronically Filed
 Mar 07 2022 04:40 p.m.
 Elizabeth A. Brown
 Clerk of Supreme Court

Appellants,

v.

A CAB TAXI SERVICE, LLC; A CAB)
 LLC, AND CREIGHTON J. NADY)

Supreme Court No. 82539

District Court No. A-12-669926-C

Respondents.

RESPONDENTS PETITION FOR REHEARING

Esther Rodriguez (6473)
 RODRIGUEZ LAW OFFICE, P.C.
 10161 Park Run Drive, Suite 150
 Las Vegas, NV 89145

Attorney for Respondents

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Pursuant to Nevada Rule of Appellate Procedure 40, Respondents request a rehearing on the Court's decision to remand the matter to the District Court for a hearing on the merits of Appellants' request for appointment of a receiver over the taxicab company to aid judgment enforcement. *Order of Reversal and Remand*, Feb 17, 2022. With this Court's decision to remand for a hearing on the merits, respectfully, one critical fact was overlooked; and one critical fact was misapprehended. Specifically, the Court overlooked that this appeal should have been rendered moot and dismissed based upon this Court's own partial reversal and remand contained in its decision of December 30, 2021: *A Cab, LLC v. Michael Murray*, 137 Nev. Adv. Op. 84 (Dec 30, 2021) (hereinafter "*MSJ Reversal*"). Secondly, the District Court did engage in a review of the merits of Appellants' request for a receiver, and found that Appellants had refused to comply with the outstanding district court order pertaining to the special master who was to make the recommendation pertaining to a receiver. The District Court made a determination that the process was not moving forward specifically because Appellants were in direct defiance of the District Court order that they share in the costs for the special master. This Court, on the contrary appears to have relied upon Appellants' representation that the Special Master's death was the stalling point; and that the District Court did not base its decision on an actual

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review of the merits of the request, but solely upon Appellants' untimeliness.

1. Appellants' appeal is moot and should not be remanded for a hearing on the merits.

The underlying motion which has been remanded for a hearing on the merits has been rendered moot by this Court's decision to partially reverse and remand the entry of summary judgment. *MSJ Reversal*. Appellants' underlying motion was "for the appointment of a Receiver of the judgment debtor, A Cab Series LLC, formerly known as A Cab LLC, to aid in judgment enforcement." AA0643. In this Court's review of the entry of summary judgment in this case, this Court determined that the judgment must be reversed and remanded on a number of issues for further determination and findings by the district court. *MSJ Reversal*. These reversals include a new determination of what any judgment will be after subtracting more than 3 years of claimed damages (July 1, 2007 to October 8, 2010), as well as excluding all claimants who were employed during this time period. The Court determined these years to be outside of the statute of limitations. *MSJ Reversal*, p. 32.

Secondly, this Court also remanded for a determination of what entity would even be liable for any judgment. In the reversal and remand, the Nevada Supreme Court specifically stated that a determination had to be made as to which

entity existed at the time and which bears liability for any damages that are determined. This Court stated that the District Court erred “without taking evidence on what corporate entities existed and were actually liable for the judgment.” *MSJ Reversal*, p. 32.

Accordingly, the underlying motion cannot be remanded for a hearing on the merits of appointing a receiver in aid of judgment collection against A Cab, LLC and A Cab Series, LLC when: 1) the amount of the judgment has not been determined; and 2) these named entities have not been determined to be the appropriate debtors.

This Court should dismiss this appeal as moot in light of its recent decision. To remand this issue for a hearing on the merits is nonsensical and a waste of judicial resources when this Court has already ordered the District Court to make other predominant findings and determinations. One can foresee an incongruous outcome of appointing a receiver over A Cab LLC, for example; and then the District Court determining that it is not even a proper debtor.

2. The District Court determined not to vacate the standing orders pertaining to appointment of a receiver, after a review of the merits.

In this Court’s decision to remand for a consideration on the merits of whether a Receiver should have been appointed, it misconstrued as to why

Appellants' request for receiver was "still pending"; and that Judge Kierny erred in not reviewing the merits while the request for receiver was "still pending."¹ However, Judge Kierny was briefed, understood, and considered the reasons as to why Appellants' request for a receiver was "still pending." In its decision, the Court appears to have relied upon Appellants' description that the Special Master was unable to complete his task because he passed away. The truth as reflected in the record is that Appellants refused to comply with Hon. Rob Bare's outstanding order that they should share in half of the Special Master's fees. AA630-AA0636. Once Judge Bare issued his order, Appellants refused to pay the Special Master. That is the only reason why the report by the Special Master remained pending and was not submitted to the District Court; not that the Special Master had passed away. Judge Bare's order was entered on July 17, 2020. AA630-AA0636. The Special Master, George Swarts, passed away December 25, 2020. *Defendants' Opposition to Plaintiffs' Motion for Appointment of Receiver*, p. 7 (AA0695).

Plaintiffs never complied with the Court's order to pay Mr. Swarts their share of his fees; and therefore Mr. Swarts ceased working on the matter with good reason. *Id.* It was Plaintiffs who initiated the original request for an

¹ "[A]ppellants' request remained pending at the time they brought the motion underlying this appeal. Because appellants' request for a receiver was still pending, we conclude that the district court abused its discretion when it declined to consider the merits of appellants' motion." Order of Reversal and Remand, February 17, 2022, p. 3

independent person to review the financials of the company; but when the Court ordered payment to be shared, Plaintiffs dropped the request to move forward.

Judge Kierny understood that Appellant was simply refusing to comply with the outstanding District Court order that was in place already to determine whether appointment of a receiver was appropriate. A party cannot simply disregard a Court order, and ask for a do-over while in contempt of an outstanding order. This is exactly what occurred here.

As stated in the district court's order, Hon. Carli Kierny did conduct a review of the merits of the request, and determined there was no need to vacate the standing order of the case issued by Hon. Rob Bare and to replace it with an appointment of a receiver. The district court order states that the appellant has put forth no good cause to vacate the standing orders of her predecessors. In sum, a review of the merits was conducted in rendering this determination that there was no good cause to stray from the recommended course of a special master to provide guidance to the Court pertaining to the need for a receiver. The District Court denied Plaintiffs' motion indicating, "The record reflects Judge Bare was careful in his decision and he did factor in the *Nelson* factors² before rendering a limited stay as defendants had posted a partial security of nearly \$300,000." *Order*

² *Nelson v. Heer*, 122 P.3d 1252, 1254 (2005)

on Plaintiffs' Motion for Appointment of Receiver, AA0870.

As the District Court determined, it is incumbent upon the Appellants to demonstrate that something has changed that would require the new Judge to vacate the standing orders of her predecessors. To make this determination, the Court did engage in a review of the extensive history and the present circumstances, and rendered its decision after this review of the merits. After reviewing “the lengthy history of the case”, the briefings and the findings of her predecessors, Judge Cory and Judge Bare, Judge Kierny wrote: “[T]he Court fully reviewed the briefings of the parties and finds this is a motion for reconsideration and not a new motion.”

However, before issuing its denial, the District Court did engage in a thorough review of the history of the 9 year litigation and determined that although Appellants were filing as a “new” motion, their motion was not in fact a new motion. The District Court astutely determined that all of these same requests for a receiver, for a bond, for further security, had all been brought and ruled upon. It is clear that this is why the District Court considered Appellants’ request as for reconsideration, as it was a re-hearing on the same issues. Nevertheless, Judge Kierny conducted an independent analysis yet again to come to this determination.

The appointment or denial of a request for a receiver rests in the discretion

of the court to which the application is made, to be governed by a consideration of the entire circumstances of the case, and will not be disturbed upon appeal unless there has been a clear abuse. *See Bowler v. Leonard*, 269 P.2d 833, 70 Nev. 370 (1954).³

Judge Kierny was briefed and considered that in this 9 year litigation when the Court had sought further detail, it has relied upon the appointment of a Special Master. AA0343-AA0350; AA0437-AA0442. In the prior opinions of the District Court judges, there had never been adequate grounds for the appointment of a Receiver. AA0343-AA0350; AA0630-AA0636. The District Court judges understood and determined that appointment of a receiver was not necessary.

Included in Judge Kierny's consideration of the merits was:

1. There had been and were presently other tools available to the Court to ascertain any questions regarding the financial condition of the taxicab company, namely a Special Master; and namely that there was

³ In this appeal, there was no abuse of discretion. Three (3) District Court judges, as well as a Federal Bankruptcy Judge, all determined that appointment of a receiver was not appropriate in this case and denied Appellants' repeated requests to do so. AA343-AA0350; AA0630-AA0636; RA00333-RA00354 All judicial officers reviewed and were familiar with the totality of the circumstances of the case and proceeded to deny Appellants' request for a receiver, a remedy of last resort.

an outstanding Court order in existence which Appellants were disregarding. AA0694

2. The District Court recognized that a taxicab company is a unique species that is highly regulated by the State Taxicab Authority and the Nevada Transportation Authority. AA0702-AA0704 These regulatory agencies not only supervise operations but also the financial well-being of the taxicab companies with required monthly reporting, audits, and year-end required reporting. NRS 706.196; NAC 706.218
3. An appointment of a receiver would also violate the provisions of NRS 706.8827. Judge Kierny was informed of this important distinction which had already been noted by Judge Cory, in that the regulatory agency for the taxicab industry (the State of Nevada Taxicab Authority) had indicated its opposition to an appointment of a "receiver," which would pose problems for licensing and operations, as a "receiver" does not hold a license to operate the business. (See NRS 706.491 Motor carrier must be licensed. Every person operating as a common, contract or private motor carrier must, before commencing operation in this State in any calendar year,

secure from the Department a license and make payments therefor as provided in NRS 706.011 to 706.861, inclusive, as applicable.)

AA0702-AA0705

4. The District Court recognized that more than **\$300,000.00** is being held in Appellants' trust account through voluntary payments from Respondent, as well as seizures from the other Series LLC companies. AA0701; AA08070
5. The District Court considered that A Cab had already paid more than **\$139,998.00** (*Thomas E. Perez v. A Cab, LLC*, USDC 2:14-cv-01615-JCM-VCF) towards the claims for minimum wage for overlapping time periods, which had already distributed to the claimants through the Department of Labor. AA0088
6. Evidence was put before Judge Kierny that Plaintiffs' request for a receiver was contrary to the existing Special Master Report submitted to the Court. AA609; AA705-AA706; AA769-AA0775

Therefore, the District Court recognized the untruthfulness in Appellants' statements that a receiver was necessary as no security was provided towards their judgment. Substantial funds of a half million had already been paid. As in the *Bowler* case, the District Court determined that this was not a proper case for

receivership since an adequate remedy at law exists.

Appellants' assertions that Judge Kierny did not weigh the factors in making her determinations or in assessing the factors outlined in *Nelson v. Heer*, 122 P.3d 1252, 1254 (2005) is without basis. The record is clear that Judge Kierny and her predecessors were presented with substantial evidence and briefing to support their decisions. Multiple hearings addressed the "receiver" issue as the transcripts reflect, demonstrating that more than ample consideration has been given to Appellants' repeated requests. As Judge Kierny's order reflects, she reviewed the "lengthy history of this case," and the merits each time this was raised; and determined nothing new was presented warranting a reversal in course.

AA0869

As such, the District Court was well within its discretion to deny Appellants' motion for a receiver both as time-barred and without merit after a full consideration of the record.

CONCLUSION

Respectfully, this Court should dismiss this appeal as it is moot; or in the alternative, affirm the decision below.

ATTORNEY'S CERTIFICATE

1. I certify that this brief complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6) because it has been prepared in a proportionally spaced typeface using WordPerfect X4 in 14 point Times New Roman font.

2. I further certify that this brief complies with the type-volume limitations of NRAP 40 because it is proportionately spaced, has a typeface of 14 points and contains 2,217 words.

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

DATED this 7th day of March, 2022.

RODRIGUEZ LAW OFFICES, P.C.

/s/ Esther C. Rodriguez, Esq.

Esther C. Rodriguez (6473)
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10161 Park Run Drive, Suite 150
Las Vegas, NV 89145
Attorney for Respondents

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CERTIFICATE OF SERVICE

I certify that I am an employee of RODRIGUEZ LAW OFFICES, P.C. and that on this date **RESPONDENTS' PETITION FOR REHEARING** was filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list as follows:

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 Las Vegas, NV 89146
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leongreenberg@overtimelaw.com

Attorneys for Appellants

DATED this 7th day of March, 2022.

/s/ Susan Dillow

 An employee of Rodriguez Law Offices, P.C.

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EXHIBIT 2

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EXHIBIT 2

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

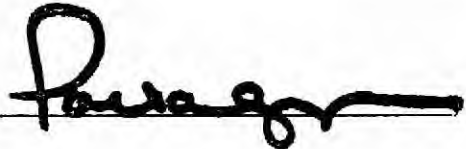
appeal is denied without prejudice to respondents' right to raise this motion in the district court.

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.

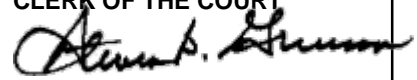
cc: Hon. Kenneth C. Cory, District Judge
Rodriguez Law Offices, P.C.
Cory Reade Dows & Shafer
Hutchison & Steffen, LLC/Las Vegas
Leon Greenberg Professional Corporation
Eighth District Court Clerk

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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
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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:

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Las Vegas, Nevada 89146

Christian Gabroy, Esq.
Gabroy Law Offices
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Henderson, Nevada 89012
Co-Counsel for Plaintiffs

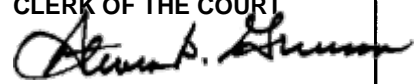
/s/ Susan Dillow
An Employee of Rodriguez Law Offices, P.C.

EXHIBIT 1

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EXHIBIT 1



ORDR

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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.

23 ...

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Murray v. A Cab, LLC, et al; District Court Case A-12-669926-C

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

HL

Submitted by:

RODRIGUEZ LAW OFFICES, P.C.

Approved as to form and content:

LEON GREENBERG PROFESSIONAL CORPORATION

EC Rodriguez

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EXHIBIT 2

003900

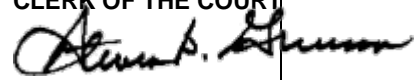
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EXHIBIT 2

	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

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DISTRICT COURT
CLARK COUNTY, NEVADA

MICHAEL MURRAY,
Plaintiff,

vs.

A CAB TAXI SERVICE LLC,
Defendant,

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

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

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

APPEARANCES:

For the Plaintiff:

LEON GREENBERG, ESQ.
RUTHAN GONZALEZ, ESQ.

For Defendants:
Creighton J. Nady

A Cab Taxi Service LLC

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

RECORDED BY: JESSICA KIRKPATRICK, COURT RECORDER

003902

003902

1 Las Vegas, Nevada, Wednesday, March 9, 2022

2
3 [Case called at 10:22 a.m.]

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

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

8 THE COURT: Okay.

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

11 THE COURT: All right.

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

14 MR. SHAFER: Yes. Jay Shafer.

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

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

21 MS. RODRIGUEZ: I am, Your Honor.

22 THE COURT: Okay. Go ahead.

23 MS. RODRIGUEZ: Well briefly, Your Honor, hopefully the
24 Court received my reply which was filed yesterday according to the
25 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

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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.

1 THE COURT: You've both been wonderful.
2 MS. RODRIGUEZ: Thank you, Your Honor.
3 THE COURT: Thank you so much everyone.
4 MS. RODRIGUEZ: I'll prepare an order.

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

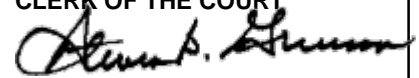
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ATTEST: I do hereby certify that I have truly and correctly transcribed the audio/video proceedings in the above-entitled case to the best of my ability.


Jessica Kirkpatrick
Court Recorder/Transcriber

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1 **NEOJ**

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

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

16 Plaintiffs,)

17 vs.)

18 A CAB TAXI SERVICE LLC, and A)
19 CAB, LLC,)

20 Defendants.)

Case No.: A-12-669926-C

Dept.: IX

NOTICE OF ENTRY OF
ORDER

21
22 PLEASE TAKE NOTICE that the Court entered the attached Order on May 3,
23 2022.

24 Dated: May 3, 2022

25 LEON GREENBERG PROFESSIONAL CORP.

26 */s/ Leon Greenberg*

27 Leon Greenberg, Esq.
28 Nevada Bar No. 8094
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Tel (702) 383-6085
Attorney for the Plaintiffs

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CERTIFICATE OF SERVICE

The undersigned certifies that on May 3, 2022, she served the within:

NOTICE OF ENTRY OF ORDER

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

JAY A. SHAFER, ESQ.
CORY READE DOWS AND SHAFER
1333 North Buffalo Drive, Suite 210
Las Vegas, NV 89128

/s/ *Ruthann Devereaux-Gonzalez*

Ruthann Devereaux-Gonzalez

ORDR

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**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, A
CAB, LLC, and CREIGHTON J.
NADY,

Defendants.

Case No.: A-12-669926-C

Dept.: II

**ORDER GRANTING DEFENDANTS'
MOTION TO STAY**

On March 9, 2022, the Court heard defendants' motion to stay on an order
shortening time, the defendants appearing by their counsel, Esther Rodriguez and Jay

1 A. Shafer, the plaintiffs appearing by their counsel, Leon Greenberg and Ruthann
 2 Devereaux-Gonzalez, and after due deliberation, and considering the briefs of the
 3 parties and other papers on file, the Court hereby finds:

5 Based on the arguments set forth by defendants in their submissions, the
 6 decision in the pending *Dubric* appeal, Nevada Supreme Court Case No. 83492, will
 7 affect the new judgment in this case. The defendants have met the four factors
 8 required by *Dollar Rent a Car of Washington v. The Travelers Indemnity Company*,
 9 774 F.2d 1371 (1985), to secure the stay of this proceeding that they seek.
 10 Specifically, there is a strong showing that the defendants are likely to prevail; and
 11 will sustain irreparable injury without a stay and sustain such an injury in the form of
 12 a double recovery against them, the entry of duplicative judgments, and the wrongful
 13 distribution of settlement funds. The Court also finds other interested parties, and
 14 ultimately the public interest, would be substantially harmed if a stay does not issue
 15 and that the defendants have already posted sufficient security and no additional
 16 security should be required for the securing of the requested stay. Accordingly,
 17 Defendant's motion to stay on an order shortening time is GRANTED.
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22 IT IS HEREBY ORDERED that:

23 Defendant's motion to stay is GRANTED.

24 Dated this 3rd day of May, 2022

25 **IT IS SO ORDERED.**

26 

27 Honorable Carli Kierny

28 District Court Judge

Carli Kierny

District Court Judge

Date

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2 Submitted by:

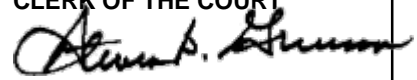
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4 By: /s/ Leon Greenberg
Leon Greenberg, Esq.
5 LEON GREENBERG PROF. CORP.
6 2965 S. Jones Blvd. Ste. E-3
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7 Attorneys for Plaintiffs

8 Not approved as to form and content:

9
10 By: _____
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Attorneys for Defendants

DISTRICT COURT
CLARK COUNTY, NEVADA

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

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

Plaintiffs,

vs.

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

Defendants.

NOTICE OF ENTRY OF ORDER

GRANTING DEFENDANTS' MOTION FOR COSTS

PLEASE TAKE NOTICE that an Order Granting Defendants' Motion for Costs was entered

...

...

...

...

...

by the Court on May 17, 2022. A copy of the Order is attached hereto.

DATED this 17th day of May, 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

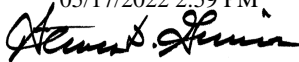
CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 17th day of May, 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:

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Christian Gabroy, Esq.
 Gabroy Law Offices
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 Henderson, Nevada 89012
Co-Counsel for Plaintiffs

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



CLERK OF THE COURT

ORDR

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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

**ORDER GRANTING DEFENDANTS'
MOTION FOR COSTS**

Hearing Date: February 16, 2022

This matter having come before the Court for hearing on February 16, 2022, before the Honorable Gloria Sturman, and counsel for Plaintiffs and Defendants having appeared, and having considered the Defendants A Cab, LLC and A Cab Series, LLC's *Motion for Costs*, including the response and countermotion, reply and supplements filed by the parties and the arguments of all such counsel, and after due deliberation, the Court **GRANTS** Defendants' motion and **DENIES** Plaintiffs' countermotion as follows:

THE COURT FINDS that pursuant to NRAP 39 and NRS 18.060 costs are properly awarded from the District Court to Appellants/Defendants resulting from the appeal of the summary

judgment entered in this matter on August 22, 2018, with associated orders. Appellants have incurred these said costs in having to appeal the judgment entered in error in this matter, as reflected by the decision rendered by the Nevada Supreme Court at 137 Nev. Adv. Op. 84 on December 30, 2021. Defendants have properly supported their request with a verified Memorandum of Costs and accompanying receipts.

Specifically, Defendants are awarded \$7,587.37 as costs incurred in the appeal minus \$500 for prior appeals and related costs of \$34.50.

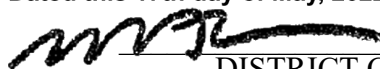
Accordingly, Defendants are awarded a total of \$7,052.87 as costs, and against Plaintiffs.

THE COURT FURTHER FINDS that the cost bonds posted by Defendants in the amount of \$500.00 on March 23, 2017; and \$500.00 on October 2, 2018, are properly released to Defendants and are addressed by separate order of this Court.

IT IS SO ORDERED.

Dated this ____ day of _____, 2022. Heard For JUDGE CARLI KIERNY

Dated this 17th day of May, 2022



DISTRICT COURT JUDGE

428 B0F 8CD7 E234

Submitted by:

Gloria Sturman Approved as to Form:
District Court Judge

RODRIGUEZ LAW OFFICES, P.C.

LEON GREENBERG PROFESSIONAL CORPORATION

/s/ Esther C. Rodriguez, Esq.

not approved

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1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Michael Murray, Plaintiff(s)

CASE NO: A-12-669926-C

7 vs.

DEPT. NO. Department 9

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 Granting was served via the court's electronic eFile system to all
14 recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 5/17/2022

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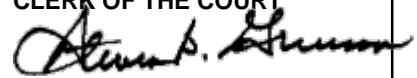
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DISTRICT COURT
CLARK COUNTY, NEVADA

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

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

Plaintiffs,

vs.

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

Defendants.

NOTICE OF ENTRY OF ORDER GRANTING
DEFENDANTS' MOTION FOR RELEASE OF COST BONDS

PLEASE TAKE NOTICE that an Order Granting Defendants' Motion for Release of Cost
Bonds was entered by the Court on May 19, 2022.

...

...

...

...

1 A copy of the Order is attached hereto.

2 DATED this 20th day of May, 2022.

3 **RODRIGUEZ LAW OFFICES, P. C.**

4
5 /s/ Esther C. Rodriguez, Esq.
6 Esther C. Rodriguez, Esq.
7 Nevada State Bar No. 006473
8 10161 Park Run Drive, Suite 150
9 Las Vegas, Nevada 89145
10 *Attorneys for Defendants*

11 **CERTIFICATE OF SERVICE**

12 I HEREBY CERTIFY on this 20th day of May, 2022, I electronically filed the foregoing
13 with the Eighth Judicial District Court Clerk of Court using the E-file and Serve System which will
14 send a notice of electronic service to the following:

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18 Las Vegas, Nevada 89146

19 Christian Gabroy, Esq.
20 Gabroy Law Offices
21 170 South Green Valley Parkway # 280
22 Henderson, Nevada 89012
23 *Co-Counsel for Plaintiffs*

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

ORDR

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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** IX

**ORDER GRANTING DEFENDANTS'
MOTION FOR RELEASE OF COST
BONDS**

This matter having come before the Court on the motion of Defendants, and after due
deliberation the Court hereby ORDERS that Defendants' motion is granted and;

The Court ORDERS that the amount of \$500.00, paid to the Clerk of the Court by Rodriguez
Law Offices, P.C., on March 23, 2017, as an appeal bond in this case be released and refunded to
Defendants' counsel.

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Case A-12-669926-C

The Court FURTHER ORDERS that the amount of \$500.00 paid to the Clerk of the Court by Rodriguez Law Offices, P.C., on October 2, 2018, as an appeal bond in this case be released and refunded to Defendants' counsel.

IT IS SO ORDERED.

Heard for Judge Carli Kierny

Dated this ____ day of _____, 2022.

Dated this 19th day of May, 2022


DISTRICT COURT JUDGE

BB9 651 9508 4C51
Gloria Sturman
District Court Judge

Submitted by:

RODRIGUEZ LAW OFFICES, P.C.

/s/ Esther C. Rodriguez, Esq.

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1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Michael Murray, Plaintiff(s)

CASE NO: A-12-669926-C

7 vs.

DEPT. NO. Department 9

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

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

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13 Court. The foregoing Order 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: 5/19/2022

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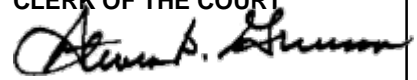
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Attorneys for Plaintiffs

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

Defendants.

Case No.: A-12-669926-C

Dept.: II

**PLAINTIFFS' MOTION TO
STAY, OFFSET, OR
APPORTION AWARD OF
COSTS AND/OR
RECONSIDER AWARD OF
COSTS**

Hearing Requested

Plaintiffs, through their attorneys, Leon Greenberg Professional Corporation,
hereby submit this motion to stay, offset, or apportion the Court's award of certain
appellate costs to defendants and/or reconsider that award.

SUMMARY OF MOTION

**The appeal costs awarded must be apportioned among
hundreds of class members, or applied as an offset against the
entire class judgment, or its enforcement stayed until the much
larger class action judgment in this case is confirmed post-remittitur.**

On May 17, 2022, the Court entered an Order awarding defendants appellate
costs of \$7,587.37 against plaintiffs. Ex. "A." Yet as discussed, *infra*, the appeal at
issue affirmed, as reduced by 34%, a class action judgment that remains in favor of

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661 class member plaintiffs for \$685,886 — or an amount of \$1,038 on average per class member. The defendants cannot be properly allowed to seek payment of the entirety of that \$7,587.37 against just a single class member plaintiff, such as the named plaintiffs Reno and/or Murray. Such a result, where the defendants would collect far more from Reno or Murray than they were, individually, awarded by the judgment, would be grossly unfair and unjust. The defendant's \$7,587.37 costs award should constitute an offset against the entire class judgment and reduce each plaintiff class member's individual judgment proportionally. Or it should be awarded against each class member individually in an equal amount of \$11.48 ($\$7,587/661 = \11.48). Alternatively, the Court can stay all enforcement of that costs award and resolve this issue when the amount of the judgment, as directed by the Supreme Court's remittitur, is confirmed by the Court.

**Reconsideration of the Court's costs award Order should be
be granted as that Order was, in part, clearly erroneous.**

The Court's cost award Order was clearly erroneous in the following respects:

- (1) Defendants have not established their entitlement to more than \$1,342.32 in "reasonable and necessary" appeal costs as required by controlling Nevada Supreme Court precedents;
- (2) The award of appeal costs must be to defendant "A Cab Series LLC" only, as the other defendant (Nady) was not a party to the appeal;
- (3) Plaintiffs' counter-motion to apportion any award of costs as a set-off against the class judgment, as to be confirmed upon remittitur, was denied without explanation and in error.

CURRENT STATUS OF THIS CASE

On August 21, 2018, the plaintiffs secured a class action judgment for 889 taxi driver employees of defendant A Cab Series LLC ("A Cab") for over \$1,000,000 for unpaid minimum wages. Ex. "B" judgment. On December 30, 2021, the Nevada Supreme Court, in an *en banc* Opinion, affirmed that judgment and modified it by

1 directing it be reduced by the amount awarded for the time period preceding October
2 8, 2010, the two-year statute of limitations. *A Cab LLC v. Murray*, 501 P.3d 961, 971
3 (Nev. Sup. Ct. 2021). The application of that shorter statute of limitations period
4 reduces that judgment by about 34% to \$685,886 on behalf of 661 class member taxi
5 drivers. The amount of that modified judgment is established by the record of these
6 proceedings but has not been confirmed by the Court owing to a stay of these
7 proceedings, requested by defendants and directed by Judge Kierny who is no longer
8 hearing this case. *See*, Ex. “C” motion filed February 14, 2022, seeking entry of
9 modified judgment as directed by Remittitur (without 149 pages of exhibits thereto);
10 Ex. “D” declaration of Charles Bass of March 28, 2022, at ¶¶ 1- 2 explaining prior
11 error of \$883.88 in declaration submitted in support of that motion and detailing the
12 \$685,886.60 owed to 661 taxi driver class members under the modified judgment; and
13 Ex. “E” Order of May 3, 2022, staying this case pending the resolution of the *Dubric*
14 appeal, Nevada Supreme Court Case No. 83492. Judge Kierny’s Order staying this
15 case is the subject of a writ petition that defendants have been Ordered to answer, their
16 answer currently being due June 30, 2022. Ex. “F” Order of the Nevada Supreme
17 Court.

18 The Nevada Supreme Court has also confirmed that the plaintiffs’ judgment, as
19 modified by its Opinion, is to be considered to have existed, and to continue to exist
20 and accrue post judgment interest, since the date of its initial entry on August 21,
21 2018. Ex. “G” Order. This means over \$125,000 of post-judgment interest has
22 accrued and the plaintiff class members are currently owed in excess of \$800,000.

23 ARGUMENT

24 **I. In a class action a judgment in favor of the class is a collective**
25 **victory; in such circumstances the class as a whole, not the individual**
26 **class representatives, must assume responsibility for any costs.**

27 Successful class actions result in a “common fund” or “common benefit” being
28 secured for the numerous class member plaintiffs. Even before the development of

1 modern class action practice, courts have recognized that in such cases all class
2 members receiving a benefit must also shoulder their share of the costs of such
3 litigation, as a matter of equity and *quantum meruit*. See, *Central Railroad & Banking*
4 *Co. v. Pettus*, 113 U.S. 116, 124 (1885) and *Trustees v. Greenough*, 105 U.S. 527, 532
5 (1881) (both finding costs and attorneys fees incurred to recover funds for the benefit
6 of numerous persons were properly paid from those funds). See, also, Newberg on
7 Class Actions, 5th Ed., § 15:53, discussing the “common fund doctrine.”

8 The class members, collectively, have recovered in this case and it is they,
9 collectively, that must bear the costs (in a much smaller amount) owed to the
10 defendant A Cab that were attendant to that recovery. It would be unjust to allow A
11 Cab to persecute the named plaintiffs, Murray and Reno, and seek to collect those
12 costs solely from them when those two plaintiffs have benefitted over 600 other class
13 members. As a result, the costs awarded to A Cab must be offset against the
14 collective class judgment or equally (for \$11.48) against each class member. The
15 Court can, and should, resolve that issue when it confirms the amount of the post-
16 remittitur judgment.

17 **II. The Court’s May 17, 2022, Order was, in part, clearly**
18 **erroneous; it should be reconsidered and suitably amended.**

19 This motion is made within the requisite time period for reconsideration of the
20 May 17, 2022, Order and the district court may reconsider a previously decided issue
21 if “...the decision is clearly erroneous.” *Masonry and Tile Contractors Ass’n of S.*
22 *Nev. v. Jolley, Urga & Wirth, Ltd.*, 941 P.2d 486, 489 (Nev. Sup. Ct. 1997) (district
23 judge’s reconsideration and reversal of order entered by different district judge was
24 proper as order was “clearly erroneous”). See, also, *Jones v. Gugino*, 2015 WL
25 6830932 (Nev. Ct. App. 2015) (district judge properly found prior decision by senior
26 judge was “clearly erroneous” and granted reconsideration, citing *Masonry and Tile*
27 *Contractors*).

1 **A. It was clearly erroneous to deny plaintiffs’**
2 **counter-motion to apportion any award of costs.**

3 No reason was given in the Court’s Order or by the Court from the bench at the
4 hearing held on February 16, 2022, for denying plaintiffs’ counter-motion to apportion
5 or offset the award of costs. Having never examined the issue, it was clearly erroneous
6 for the Court to deny (with prejudice¹) that relief. And as discussed, *supra*, equity,
7 fairness, and common sense, requires such a set-off or apportionment be performed.

8 **B. It was clearly erroneous to grant the costs award in favor**
9 **of all defendants, it can only be for the appellant, A Cab.**

10 There are two defendants in this case — A Cab² and Creighton J. Nady. The
11 only appellant was A Cab, the Nevada Supreme Court dismissing Nady’s effort to
12 appeal for lack of standing and denying him appellant status. Ex. “H” order. The
13 award of appeal costs must only be in favor of A Cab, the only appellant, not A Cab
14 and Nady jointly. It was clearly erroneous for the Order to grant costs to “defendants”
15 collectively.³

16 **C. It was clearly erroneous to award costs in excess of \$1,342.32;**
17 **\$6,764.87 in court report costs were awarded but A Cab**
18 **was entitled to, at most, \$1,050.82 of those costs.**

19 **1. A Cab, as the party seeking costs, must establish**
20 **“why each cost was necessary” to be awarded such cost.**

21 As the Nevada Supreme Court observed in the appeal of this very case, 137
22 Nev. Adv. Op. 84, p. 24-25, “trial courts are urged to exercise restraint and strictly

23 ¹ Plaintiffs asked defendants to revise the Order to deny the counter-motion
24 without prejudice. Defendants refused and submitted the proposed Order at 5:34 p.m.
25 on 5/16/22, the Court entered it at 2:59 p.m. on 5/17/22 before plaintiffs could submit
26 their own draft for the Court’s consideration.

27 ² A Cab, as discussed in the Supreme Court’s Opinion, is but a single entity,
28 although it goes or has gone by more than one name as set forth in the caption.

³ Plaintiffs tried to secure defendants’ agreement to a revision of the Order to
make it costs award solely in favor of A Cab but defendants refused to do so.

1 construe statutes permitting recovery of costs” and a party seeking costs must provide
 2 “justifying documentation” demonstrating “how such [claimed costs] were necessary
 3 to and incurred in the present action.” citing *In re DISH Network Derivative Litig.*, 133
 4 Nev. 401 P.3d at 1093 (2017); *Cadle Co. v. Woods & Erickson, LLP*, 345 P.3d 1049,
 5 1054 (Nev. Sup. Ct. 2015); *Village Builders 96, L.P. v. U.S. Labs, Inc.*, 112 P.3d 1082,
 6 1092-93 (Nev. Sup. Ct. 2009) and *Bobby Berosini, Ltd., v. PETA*, 971 P.2d 383, 386
 7 (Nev. Sup. Ct. 1998). Defendant provides no justification for the vast majority of the
 8 \$6,864.87 for reporter’s transcript costs awarded. An examination of the record
 9 indicates no more than \$562.22, or possibly \$1,050.82, of those costs can be justified.

10 **2. No more than \$2,780.82 of the claimed \$6,764.87 in court**
 11 **reporter fees could have been “needed” for the post-**
 12 **judgment appeal; \$3,984.05 in claimed court reporter**
fees were paid prior to judgment and for use during
the district court proceedings not for the appeal.

13 Defendant claims court reporter costs totaling \$6,764.87 for transcripts of
 14 hearings on 24 different dates, all allegedly incurred because they were “needed to
 15 determine the appeal.” The amount actually paid for transcripts that were “needed for
 16 the appeal” cannot exceed \$2,780.82, the amount of court reporter costs paid after
 17 entry of judgment. Ex, “I” ¶ 2. Transcripts defendant paid for prior to judgment were
 18 not paid for because they were “needed for the appeal” of the judgment but for use in
 19 the district court proceedings.⁴ The court reporter costs recoverable by defendant
 20 under NRS 18.060 and NRAP 39(e) are limited to transcripts paid for because they
 21 were “needed to determine the appeal.” *i.e.*, they were not already paid for and in
 22 defendant’s possession prior to the appeal.

24 ⁴ Those district court proceeding transcript costs would have been recoverable
 25 by defendant at the time of final judgment if it had prevailed in the district court, but it
 26 did not. *See*, NRS 18.005(8). Defendant does not become eligible to receive those
 27 costs because it appealed, secured a modification of the adverse judgment (which still
 28 remains adverse to it) and placed in the record of the appeal numerous transcripts. It
 remains the loser in the district court proceedings and is not entitled to any district
 court transcript costs except those specifically incurred for the appeal.

1 **3. Of the potential \$2,780.82 in post-judgment court**
2 **reporter expenses that might constitute costs, defendant**
3 **has only justified a maximum of \$1,050.82 of such costs.**

4 Of the \$2,780.82 in court reporter costs that *might* have been paid by defendant
5 because they were “needed for the appeal,” \$1,730 cannot be awarded as costs because
6 defendant has failed to properly substantiate the same. That \$1,730, though paid after
7 judgment, was in an unitemized invoice for seven different transcripts, including five
8 that were *not used* in the appeal (they were not in the appeal appendix). Ex. “I” ¶ 3. It
9 is impossible to determine what portion of that \$1,730 is a potentially properly claimed
10 appeal cost (for two out of seven transcripts) and that entire \$1,730 must be denied.
11 *See, Cadle Co.*, 345 P.3d at 1054, and the other authorities discussed, *supra*, requiring
12 itemization of each proper cost. This leaves a total of no more than \$1,052.82 of such
costs.

13 **4. Defendant is entitled to a maximum of \$1,050.82 in court**
14 **reporter costs, or more properly \$562.22 of such costs.**

15 As discussed, *supra*, and corroborated in Ex. “I,” no more than \$1,050.82 of
16 court reporter fees are potentially properly taxed as costs for defendant. Of that
17 amount, \$488.60 was paid for the transcript of the hearing held post-judgment on
18 October 22, 2018, on defendant’s motion to dismiss the claims, for a new trial, and its
19 opposition to plaintiffs’ motion to amend the judgment. Ex, “I” ¶ 4. It did not secure
20 relief on any of those issues on appeal. *Id.* NRS 18.060 provides “...a party obtaining
21 any relief shall have his or her costs.” Defendant was not a party obtaining “relief” as
22 to those issues and should not be awarded that \$488.60 in claimed costs. While
23 defendant will presumably argue they are entitled to all costs since they obtained *some*
24 relief from the appeal that is neither logical nor reasonable. It is also unreasonable to
25 reward a party with costs that can be in the thousands of dollars for raising
26 unsuccessful claims on appeal. It is also contrary to the Supreme Court’s holding in
27 this very case, discussed *supra*. The language of NRS 18.060 ties the award of costs
28 to the relief itself: “the party” who secures “any relief shall have his or her costs”

1 meaning *the costs associated with that relief*. That \$488.60 should be excluded from
2 such a costs award. This results in a total cost award of \$562.22 to defendant for court
3 reporter appeal transcripts.

4 **5. Even if the Court were to find court reporter fees paid**
5 **prior to judgment could be “costs” under NRAP 39(e)**
6 **defendant has still failed to establish its entitlement to**
7 **court reporter costs exceeding \$1,050.82.**

8 Defendant will likely insist that the “cost” of a court reporter transcript it “used”
9 for the post-judgment appeal is recoverable even though it paid that cost for its benefit
10 in the district court proceedings and prior to judgment or the existence of any appeal.
11 That interpretation of NRAP 39(e) would be incorrect, as it only allows such costs
12 when the transcript expense was incurred because it was “needed to determine the
13 appeal.” But even if the Court were to adopt defendant’s interpretation of such rule,
14 defendant has not shown under such an approach that more than \$1,050.82 in court
15 reporter costs were properly incurred for use in the appeal.

16 Defendant seeks costs for six transcripts not even arguably “used” in the appeal
17 — they were not in its appeal appendix and one of those six was not even from this
18 case. Those transcripts cost \$2,000. Ex. “I” ¶¶ 3, 5. It seeks costs for a court
19 reporter transcript from 2017 concerning the injunction issued in this case that was
20 subject to the 2017 appeal and not part of this appeal. That claimed cost is \$116. *Id.* It
21 seeks costs of \$1,024.92 (including a \$33.26 credit card fee) for a transcript from
22 November 3, 2015, on its unsuccessful motion to dismiss and addressing none of the
23 other issues raised on appeal, it was not necessary to the appeal. Ex. “I” ¶ 6.
24 Defendant’s election to place in the appeal record \$1,000 or several thousand dollars
25 worth of useless transcripts does not create a right for it to recover those amounts as
26 “costs” — they were not “needed” for the appeal and defendant does not explain how
27 they were needed.

28 The only two transcripts defendant has identified that were arguably “used” and
“needed” for the purposes of the appeal were for the two issues it secured relief upon

1 on the appeal: the tolling of the statute of limitations and the post-judgment quashing
2 of the judgment execution. In respect to the former, prepared prior to judgment, it had
3 court reporter costs of \$816.32. In respect to the latter it did not justify its costs for
4 that transcript since it presented it as part of a \$1,730 invoice covering seven different
5 (and five not used) transcripts.

6 7 **CONCLUSION**

8 For all the foregoing reasons, plaintiffs' motion should granted.

9 Dated: May 31, 2022

10 LEON GREENBERG PROFESSIONAL CORP.

11 /s/ Leon Greenberg
12 Leon Greenberg, Esq.
13 Nevada Bar No. 8094
14 2965 S. Jones Boulevard - Ste. E-3
15 Las Vegas, NV 89146
16 Tel (702) 383-6085
17 Attorney for the Class
18
19
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1
2 PROOF OF SERVICE
3

4 The undersigned certifies that on May 31, 2022 she served the within:

5 **PLAINTIFFS' MOTION TO STAY, OFFSET, OR APPORTION AWARD OF**
6 **COSTS AND/OR RECONSIDER AWARD OF COSTS**

7 by court electronic service to:

8 TO:

9 Esther C. Rodriguez, Esq.
10 RODRIGUEZ LAW OFFICES, P.C.
10161 Park Run Drive, Suite 150
Las Vegas, NV 89145
11
12
13

14 /s/ Ruthann Devereaux-Gonzalez

15 Ruthann Devereaux-Gonzalez
16
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003943

APPENDIX OF EXHIBITS - *Murray v. A Cab LLC*, A-12-669926-C
Table of Contents

Exhibit	Description	Bates Nos.
A	Order Granting Defendants' Motion for Costs file May 17, 2022	0001–0003
B	Order Granting Summary Judgment, Severing Claims. And Directing Entry of Final Judgment filed August 21, 2018	0004–0068
C	Plaintiffs' Motion for Entry of a Modified Judgment as Provided for by Remittitur filed February 14, 2022	0069–0077
D	Declaration of Chrles Bass March 28, 2022	0078–0096
E	Order Granting Defendants' Motion to Stay filed May 3, 2022	0097–0100
F	Order Directing Supplementation of Appendix With Written Order and Directing Answer in Supreme Court Case No. 84456	0101–0103
G	Order Denying Motion A Cab LLC v. Murray in Supreme Court Case No. 77050 filed February 3, 2022	0104–0107
H	Order Dismissing Appeal in Supreme Court Case No. 77050 filed July 12, 2019	0108–0111
I	Declaration of Class Counsel Leon Greenberg, May 31, 2022	0112–0145

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EXHIBIT "A"

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ORDR

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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

**ORDER GRANTING DEFENDANTS'
MOTION FOR COSTS**

Hearing Date: February 16, 2022

This matter having come before the Court for hearing on February 16, 2022, before the Honorable Gloria Sturman, and counsel for Plaintiffs and Defendants having appeared, and having considered the Defendants A Cab, LLC and A Cab Series, LLC's *Motion for Costs*, including the response and countermotion, reply and supplements filed by the parties and the arguments of all such counsel, and after due deliberation, the Court **GRANTS** Defendants' motion and **DENIES** Plaintiffs' countermotion as follows:

THE COURT FINDS that pursuant to NRAP 39 and NRS 18.060 costs are properly awarded from the District Court to Appellants/Defendants resulting from the appeal of the summary

judgment entered in this matter on August 22, 2018, with associated orders. Appellants have incurred these said costs in having to appeal the judgment entered in error in this matter, as reflected by the decision rendered by the Nevada Supreme Court at 137 Nev. Adv. Op. 84 on December 30, 2021. Defendants have properly supported their request with a verified Memorandum of Costs and accompanying receipts.

Specifically, Defendants are awarded \$7,587.37 as costs incurred in the appeal minus \$500 for prior appeals and related costs of \$34.50.

Accordingly, Defendants are awarded a total of \$7,052.87 as costs, and against Plaintiffs.

THE COURT FURTHER FINDS that the cost bonds posted by Defendants in the amount of \$500.00 on March 23, 2017; and \$500.00 on October 2, 2018, are properly released to Defendants and are addressed by separate order of this Court.

IT IS SO ORDERED.

Dated this ____ day of _____, 2022. Heard For JUDGE CARLI KIERNY

Dated this 17th day of May, 2022



DISTRICT COURT JUDGE

Submitted by:

RODRIGUEZ LAW OFFICES, P.C.

/s/ Esther C. Rodriguez, Esq.

 Esther C. Rodriguez, Esq.
 Nevada Bar No. 6473
 10161 Park Run Drive, Suite 150
 Las Vegas, Nevada 89145
Attorneys for Defendants

428 B0F 8CD7 E234

Gloria Sturman Approved as to Form:
District Court Judge

LEON GREENBERG PROFESSIONAL CORPORATION

not approved

 Leon Greenberg, Esq.
 Nevada Bar No. 8094
 2965 South Jones Boulevard, Suite E4
 Las Vegas, Nevada 89146
Attorney for Plaintiffs

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EXHIBIT “B”

Steven D. Grierson

1 ORDR
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DISTRICT COURT
CLARK COUNTY, NEVADA

10
11 MICHAEL MURRAY and
12 MICHAEL RENO, individually and
on behalf of all others similarly
situated,

13 Plaintiffs,

14 vs.

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

17 Defendants.
18
19
20
21

Case No.: A-12-669926-C

DEPT.: I

ORDER GRANTING SUMMARY
JUDGMENT, SEVERING CLAIMS,
AND DIRECTING ENTRY OF FINAL
JUDGMENT

Hearing Date: June 5, 2018
Hearing Time: 3:00 p.m.

22 On June 5, 2018, with all the parties appearing before the Court by their
23 respective counsel as noted in the record, the Court heard argument on plaintiffs'
24 motion filed on April 17, 2018 on an Order Shortening Time seeking various relief
25 ("Plaintiffs' Motion"), including the holding of defendants in contempt for their
26 violation of the Court's prior Orders appointing a Special Master; granting partial
27 summary judgment to the plaintiffs pursuant to their motion filed on November 2,
28 2017; striking defendants' answer, granting a default judgment, and directing a prove

<input type="checkbox"/> Voluntary Dismissal	<input checked="" type="checkbox"/> Summary Judgment
<input type="checkbox"/> Involuntary Dismissal	<input type="checkbox"/> Stipulated Judgment
<input type="checkbox"/> Stipulated Dismissal	<input type="checkbox"/> Default Judgment
<input type="checkbox"/> Motion to Dismiss by Deft(s)	<input type="checkbox"/> Judgment of Arbitration

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1 up hearing. Certain portions of Plaintiffs' Motion, not further discussed in this Order,
2 were resolved pursuant to other Orders issued by the Court and at a hearing held on
3 May 23, 2018. The Court grants plaintiffs' motion, to the extent indicated in this
4 Order; it Orders a severance of the previously bifurcated claims against defendant
5 Creighton J. Nady ("Nady"); and it Orders entry of final judgment against defendants
6 A Cab Taxi Service LLC and A Cab, LLC (collectively "A Cab") and other relief as
7 indicated herein.
8

9 **RELEVANT PRIOR HISTORY - CLASS CERTIFICATION**

10
11 On February 10, 2016 the Court initially granted class action certification under
12 NRCP Rule 23(b)(2) and (b)(3) of claims made in this case pursuant to Article 15,
13 Section 16 of the Nevada Constitution, the Minimum Wage Amendment (the
14 "MWA") and for penalties under NRS 608.040 alleged to have arisen in favor of
15 certain class members as a result of such MWA violations. The class so certified in
16 that Order was, for purposes of damages under NRCP Rule 23(b)(3), composed of
17 current and former taxi driver employees of defendant A-Cab from July 1, 2007
18 through December 31, 2015, and for appropriate equitable or injunctive relief under
19 NRCP Rule 23(b)(2) from July 1, 2007 to the present and continuing into the future.
20 Via subsequent Orders the Court modified and amended that initial class certification
21 order pursuant to NRCP Rule 23(c)(1). Via its Order entered on November 21, 2016,
22 it granted class certification under NRCP Rule 23 of the third and fourth claims for
23 relief, first made in the Second Amended and Supplemental Complaint filed on
24 August 19, 2016 and made solely against defendant Nady based upon "alter ego" and
25 similar allegations. Via its Order entered on June 7, 2017, it limited the membership
26 in the class for the period of July 1, 2007 through October 8, 2010 and dismissed
27 certain class members and claims under the MWA accruing during that time period. It
28 did so consistent with the Nevada Supreme Court's ruling in *Perry v. Terrible Herbst*,

1 *Inc.*, 383 P.3d 257 (Nev. Sup. Ct. 2016) on the MWA's applicable statute of
2 limitations and what the Court found was the proper granting of an equitable toll of
3 the statute of limitations under the MWA for certain class members.
4

5 **FINDINGS SUPPORTING RELIEF GRANTED BY THE COURT**
6

7 The Court makes the following findings of fact and law supporting the relief
8 granted by this Order. The recited findings are not necessarily all of the findings that
9 would appropriately support the relief granted based upon the extensive record
10 presented, but they are the ones of fact and law that the Court believes provide at least
11 minimally sufficient support for its decision to grant the relief set forth in this Order:
12

- 13 1. A Cab was an employer of the class members during the time period at
14 issue and was required to pay the class members the minimum wage
15 specified by the MWA.
16
- 17 2. A Cab used Quickbooks computer software to prepare the paychecks
18 issued to the class members during the class period. A record of the
19 gross wages paid by A Cab to every class member during every pay
20 period exists in the Quickbooks computer files maintained by A Cab.
21 The Court Ordered A Cab to produce those records to the plaintiffs'
22 counsel and A Cab provided certain Excel files to the plaintiffs' counsel
23 in compliance with that Order.
24
- 25 3. A Cab used a computer software system called Cab Manager in which it
26 recorded the activities of its taxi cabs and the class members. The Cab
27 Manager software created a computer data file record indicating that a
28 3.

1 particular class member worked, meaning they drove a taxi cab, on a
2 particular date. The Court Ordered A Cab to produce its Cab Manager
3 computer data file records to the plaintiffs' counsel and A Cab provided
4 those computer data files to the plaintiffs' counsel in compliance with that
5 Order.

- 6
- 7 4. Pursuant to NRS 608.115(1)(d), A Cab was required to maintain a record
8 of the total hours worked by each class member for both each day they
9 worked and for each pay period. NRS 608.115(2) required A Cab to
10 furnish to each employee the information required by that section within
11 10 days after the employee submits a request. A Cab had this obligation
12 throughout the entire period of July 1, 2007 through December 31, 2015
13 during which the class members' damages under the MWA are at issue
14 (the "Class Period").
- 15
- 16 5. Except for the period between January 1, 2013 and December 31, 2015, A
17 Cab has not produced any record of hours worked by the class members
18 that it can properly claim complies with any of the requirements of NRS
19 608.115(1)(d).
- 20
- 21 6. For the period between January 1, 2013 and December 31, 2015, the
22 Excel files produced by A Cab and discussed in ¶ 2 set forth an amount of
23 hours worked by each class member during each pay period. A Cab gave
24 testimony at an NRCP Rule 30(b)(6) deposition, the relevant excerpts
25 being placed in the record, that its Quickbooks records for that time
26 period contained an accurate statement of the total hours worked by each
27 class member during each pay period. Plaintiffs do not agree that such
28

1 Quickbooks hours of work are fully accurate, but insist A Cab should be
2 bound by its testimony that such hours of work are accurately set forth in
3 those Quickbooks records. The Court agrees and finds A Cab cannot
4 dispute that the Quickbooks records it produced for the period between
5 January 1, 2013 and December 31, 2015 contain an accurate statement of
6 the hours worked during each pay period by each class member.
7

8 7. Except for the Quickbooks records discussed in ¶ 6, the only information
9 that A Cab admits possessing on the hours worked by the class members
10 during the Class Period is information in paper "trip sheets" that its taxi
11 drivers are required to complete each work shift. Those trip sheets, when
12 properly completed and legible, will be time stamped with the taxi
13 driver's shift start time and shift end time for a workday and will also
14 indicate periods of time that the taxi driver recorded themselves as being
15 on a break and not working during that workday. A Cab has repeatedly
16 asserted that those trip sheets contain an accurate record of the hours
17 worked by every class member and can, and should, be relied upon to
18 determine their hours of work.
19

20 8. The trip sheets in the possession of A Cab, to the extent they contain
21 accurate information, do not meet the requirements of NRS 608.115(1)(d)
22 or NRS 608.115(2). They are not a record of a total amount of hours or
23 fractions thereof worked in a pay period or in a workday by an individual
24 taxi driver. They are, at most, a record from which such information
25 could be obtained by further examination and calculation, however such
26 examination and calculation could not, and was not, furnished within 10
27 days as required by NRS 608.115(2). Assuming a trip sheet is accurate,
28

1 by examining the start time and end time of each trip sheet and
2 calculating the interval between those two times a workday length could
3 be ascertained. After deducting any non-working break time recorded on
4 the trip sheet from that workday length, the total amount of time worked
5 by the taxi driver for that workday could be determined.
6

- 7 9. The requirements of NRS 608.115(1)(d) are mandatory for employers and
8 compliance with those requirements are of critical importance to the
9 MWA.¹ Whether an employer has paid the minimum wage required by
10 the MWA during a particular pay period requires an examination of both
11 the wages paid to the employee and the hours they worked during the pay
12 period.² A Cab's failure to maintain the records required by NRS
13 608.115(1)(d) prior to 2013, unless remedied, would render a pay period
14 by pay period accounting of its MWA compliance, based upon an exact
15 record of the hours worked by and wages paid to each individual class
16 member, impossible for the period prior to 2013.
17

- 18 10. The MWA, being a provision of the Nevada Constitution, commands and
19 requires vigorous enforcement by this Court. By its express language it
20 confers upon employees a right to "...be entitled to all remedies available
21

22 ¹ A Cab was also advised on April 30, 2009 by an investigator for the United States
23 Department of Labor that it "must keep a record of actual hours worked" of the class
24 members. *See*, Plaintiffs' Motion for Class Certification filed May 19, 2015, Ex. "B."
25 While the absence of such an advisement would not relieve A Cab of its duty to keep
26 the records required by NRS 608.115(1)(d), such history would support a conclusion
that A Cab's failure to maintain those records was intentional and designed to render
any future minimum wage law enforcement less effective.

27 ² An exception exists if the wages paid are large enough to render an MWA violation
28 impossible. A week only contains 168 hours and a weekly wage of \$1,218 would
establish minimum wage compliance at \$7.25 an hour ($168 \times 7.25 = \$1,218$).

1 under the law or in equity appropriate to remedy any violation..."³ of its
2 provisions. As a result, A Cab's failure to maintain the records required
3 by NRS 608.115(1)(d) can be neither minimized nor tolerated and cannot
4 be allowed to frustrate the enforcement of the class members' rights
5 secured by the MWA.
6

- 7 11. The Court, in response to its foregoing findings, and in furtherance of its
8 obligation under the MWA, via Orders entered on February 7, 2018 and
9 February 13, 2018, appointed a Special Master in this case who was
10 tasked with reviewing the trip sheets in the possession of A Cab and
11 creating the record of hours worked per pay period for each class member
12 required by NRS 608.115(1)(d). The Court directed that A Cab pay for
13 such Special Master because of A Cab's failure to maintain proper
14 records under NRS 608.115, and to deposit \$25,000 with the Special
15 Master as a payment towards the cost of their work. At that stage in
16 litigation, it would not have been equitable nor justified to require
17 Plaintiffs to pay for work performed by the Special Master when it was
18 Defendant A Cab's failure to comply with NRS.608.115. A Cab failed to
19 make such payment within the time period specified by the Court. As a
20 result, the Special Master advised the Court that they have incurred
21 \$41,000 in costs towards their completion of their assignment and will
22 not proceed further with that assignment until they are in receipt of
23 sufficient assurances that they will be paid for their work. The Special
24 Master has budgeted \$180,000 as the projected total cost to complete
25 their assignment.
26

27 ³ Nevada Constitution, Article 15, Section 16 (B).
28 7.

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12. In assessing the character of A Cab's conduct, it is instructive to note that A Cab did not make, or offer to make, an *admissible* showing of its financial position in order to evidence that it was unable to make such payment. Rather, it relied solely on its strenuous protests and summary balance sheet buttressed only by the self-serving affidavit of Defendant Nady.
13. The Court, in a minute Order issued on March 6, 2018, noted its awareness of A Cab's failure to pay the then overdue \$25,000 deposit to the Special Master and A Cab's communication with the Court advising it was experiencing financial difficulties and claiming it did not currently possess the funds to make that payment. For unrelated reasons the Court in that Order stayed this case, suspended the Special Master's work, and granted A Cab additional time to raise the funds needed to pay the Special Master during the pendency of that stay. Via a minute Order on May 22, 2018 the Court lifted that stay.
14. On May 23, 2018, June 2, 2018, and June 5, 2018 the Court conducted hearings in connection with Plaintiffs' Motion and also received various written submissions from A Cab and plaintiffs' counsel regarding A Cab's failure to pay the Special Master. The result of those hearings and submissions, in respect to the status of the Special Master and A Cab's payment to him for the completion of his work, was that A Cab either will not or cannot make any payment to the Special Master. Except for urging this Court to stay this case, and await the conclusion of certain other proceedings that A Cab asserts will narrow the class claims in this
- 8.

1 case, A Cab proposed no cure for its violation of the Court's Orders
2 appointing the Special Master. It did not state when, if ever, it intended
3 to comply with those Orders or propose any other method for the Court to
4 properly, promptly and appropriately bring this case to conclusion.
5

- 6 15. The conduct of A Cab in violating the Court's Orders appointing a Special
7 Master is not the first instance of A Cab violating the Court's Orders or
8 engaging in documented litigation misconduct in this case. On March 4,
9 2016 the Court, over A Cab's objections, entered an Order adopting the
10 Report and Recommendation of the Discovery Commissioner sanctioning
11 A Cab \$3,238.95 for obstructing discovery. The Court made specific and
12 detailed findings in that Order in respect to A Cab's failure to produce the
13 Quickbooks and Cab Manager computer data files; A Cab's delay in
14 producing such materials during the eight months plaintiffs' motion to
15 compel their production had been pending; A Cab's compelling of the
16 unnecessary deposition of a non-party witness in respect to the production
17 of the Cab Manager records; and the abusive and inexcusable conduct of
18 defendant Nady as an NRCP Rule 30(b)(6) deposition witness. As
19 reflected at pages 2 and 3 in the transcript of the hearing held on
20 November 18, 2015 by the Discovery Commissioner that resulted in such
21 Order, the Discovery Commissioner's review of that deposition transcript
22 raised extremely serious concerns about the defendants' inexcusable
23 conduct.⁴
24

25 ⁴ The Discovery Commissioner advised defendants of her concern at that time that
26 defendant's conduct, if it continued, might result in some form of default judgment:
27 "It was inexcusable, what your client called Plaintiffs' counsel during the deposition,
28 which I will not repeat in open court. Inexcusable, almost to the point where I'm not
sure he should be allowed to be a Defendant in the 8th Judicial District Court-- that's
how serious this is-- because I have no confidence in what he's-- how he's answering
questions." 9.

1
2
3 16. The Court has made every effort to fashion a method for the fair, just, and
4 most precise disposition of the MWA claims in this case in light of A
5 Cab's failure to maintain a record of the hours worked per pay period of
6 each class members as required by NRS 608.115(1)(d). It is not disputed
7 that an accurate record exists in A Cab's Quickbooks computer files of the
8 amount of wages paid every pay period to every class member. If the
9 records required by NRS 608.115(1)(d) had been maintained, disposition
10 of the "lower tier" (currently \$7.25 an hour) MWA claims in this case
11 would be a matter of simple arithmetic. In response to A Cab's
12 insistence that the hours of work information required by NRS
13 608.115(1)(d) can be accurately ascertained by examining and performing
14 calculations on the trip sheets, albeit not within 10 days as required by
15 NRS 608.115(2), the Court appointed a Special Master. Yet A Cab's
16 failure to pay the Special Master, or propose any other process, such as
17 the application of statistical sample or other reasonable methodology as a
18 substitute would, unless other measures were taken by the Court, render a
19 recovery for the class members on their MWA claims impossible. That
20 would appear to be precisely what A Cab's conduct is designed to
21 achieve.

22
23 17. A Cab's argument that the only way to determine the class members'
24 hours of work is to examine every one of their trip sheets, and that it
25 should be the burden of the plaintiffs' themselves (or more properly their
26 appointed class counsel) to bear the expense of doing so, cannot be
27 adopted by the Court, and is inapposite under the guidance provided by
28 *Anderson v. Mt. Clemens Pottery Co.*, 328 U.S. 680, 687 (1946),

1 superseded by statute on other grounds, 29 U.S.C. § 254(a) ("When the
2 employer has kept proper and accurate records the employee may easily
3 discharge his burden by securing the production of those records. But
4 where the employer's records are inaccurate or inadequate and the
5 employee cannot offer convincing substitutes a more difficult problem
6 arises. The solution, however, is not to penalize the employee by denying
7 him any recovery on the ground that he is unable to prove the precise
8 extent of uncompensated work. Such a result would place a premium on
9 an employer's failure to keep proper records in conformity with his
10 statutory duty; it would allow the employer to keep the benefits of an
11 employee's labors without paying due compensation"). Doing so would
12 serve to reward A Cab for its violation of NRS 608.115(1)(d) by shifting
13 the now considerable burden and cost of ascertaining the class members'
14 hours of work onto the plaintiffs' themselves. It is A Cab that should
15 properly bear that burden and expense and it was directed to do so
16 through the offices of the Special Master that it has failed to pay.

- 17
18
19 18. In resolving MWA claims where no record of the total hours of work of
20 the employees per pay period exists as required by NRS 608.115(1)(d), or
21 such an amount cannot be precisely calculated in every instance (in this
22 case as a result of A Cab's failure to pay the Special Master), the Court
23 must adopt a reasonable approximation of those hours of work and
24 fashion an award of unpaid minimum wages based upon that
25 approximation even though the amount so awarded is not exact. *See,*
26 *Anderson v. Mt. Clemons Pottery Co.*, 328 U.S. 680, 685-88 (1946) ("The
27 employer cannot be heard to complain that the damages lack the
28 exactness of measurement that would be possible had he kept records....")

1 *Bell v. Farmers Ins. Exchange*, 115 Cal. App. 4th 715, 750 (Cal. Ct. App.,
2 1st Dist. 2004) and other cases. Applying any approach other than the
3 one adopted by *Mt. Clemons* would frustrate the purposes of the MWA
4 and make effective enforcement of the Nevada Constitution's right to a
5 minimum wage impossible.
6

7
8 19. In support of their motion for partial summary judgment ("plaintiffs'
9 MPSJ"), filed on November 2, 2017, the plaintiffs rely on portions of an
10 Excel file that contain information for the time period of January 1, 2013
11 through December 31, 2015, such information for that time period being
12 compiled from the Quickbooks records produced by defendants. That
13 Excel file, "ACAB-ALL," was created by Charles Bass whose work
14 doing so was reviewed by Terrence Clauretie Ph.D. and the subject of his
15 report, at Ex. "B" of plaintiffs' MPSJ, which was furnished to A Cab
16 along with the "ACAB-ALL" Excel file. Both Dr. Clauretie and Charles
17 Bass were designated as expert witnesses by the plaintiffs and deposed by
18 the defendants in that capacity.

19
20 20. The "A CAB ALL" Excel file created by plaintiffs contains various types
21 of information taken from the Quickbooks and Cab Manager computer
22 data files produced by A Cab to plaintiffs. As germane to this Order, it
23 summarizes that information for the period October 8, 2010 through
24 December 31, 2015 and makes calculations on that information, in
25 respect to the following:

- 26
27 (a) In respect to every pay period, it sets forth the amount of
28 wages paid by A Cab to the class member as recorded in A

1 Cab's Quickbooks records and the number of shifts they
2 worked during the pay period as recorded in A Cab's Cab
3 Manager records (the "shifts worked");
4

5 (b) For the period January 1, 2013 through December 31, 2015,
6 it sets forth the amount of hours worked by the class member
7 for each pay period as recorded by A Cab's Quickbooks
8 records (the "payroll hours");
9

10 (c) By dividing the class member's wages paid per pay period by
11 the recorded payroll hours worked per pay, for the period
12 January 1, 2013 through December 31, 2015, it calculates the
13 amount, if any, that the class member's wages were below
14 the \$7.25 an hour requirement for each pay period;
15

16 (d) It allows the user of the Excel file to enter a "shift length"
17 amount that it applies as a uniform length to every shift
18 worked during every pay period from October 8, 2010
19 through December 31, 2012. It then, based upon that
20 selected shift length, calculates the amount, if any, that the
21 class members' wages were below the \$7.25 an hour
22 requirement for each pay period.
23

24 21. A Cab argues that the "A CAB ALL" Excel file is inaccurate and
25 the calculations it makes cannot be relied upon but it cites no error
26 in any calculation it purports to perform. That Excel file was
27 furnished to defendants and examined by their own expert, Scott
28

1 Leslie, who testified at his deposition, the relevant excerpts being
2 presented to the Court, that he concurred with Dr. Clauretie's
3 finding that the calculations it made were arithmetically correct. A
4 Cab also argues it cannot be sure the information contained in the
5 "A CAB ALL" Excel file and upon which its calculations rely (the
6 payroll hours worked recorded in the Quickbooks records from
7 January 1, 2013 through December 31, 2015, the wages paid, and
8 the shifts worked, during each pay period for each class member) is
9 accurately taken from A Cab's Quickbooks and Cab Manager
10 records. Yet it has not provided to the Court a single instance
11 where its records contain information that conflicts with the per
12 pay period information set forth in the "A CAB ALL" Excel file.
13

- 14 22. Plaintiffs assert the "ACAB ALL" Excel file, and the work of
15 Charles Bass in placing information from A Cab's Quickbooks and
16 Cab Manager files in that Excel file and performing calculations on
17 that information, is a "summary or calculation" of A Cab's
18 voluminous records pursuant to NRS 52.275 though Charles Bass
19 is also designated as an expert witness. It asserts the calculations
20 made by the "ACAB ALL" Excel file are properly considered on
21 that basis. A Cab asserts that the "ACAB ALL" Excel file's
22 calculations are not properly considered under NRS 52.275 or on
23 any other basis and that neither Charles Bass nor Dr. Clauretie are
24 properly qualified as expert witnesses. The calculations made by
25 the "ACAB ALL" Excel file are not the product of any expert
26 "opinion." They involve simple arithmetic, dividing an amount
27 paid per pay period by a number of hours worked per pay period
28

1 and calculating the amount, if any, that such resulting number is
2 less than \$7.25 an hour. The plaintiffs, based upon Dr. Clauretie's
3 report of the detailed review he conducted of how Charles Bass
4 assembled the "ACAB ALL" Excel file, and the declaration of
5 Charles Bass, have met their *prima facie* burden of showing that
6 such Excel file contains information properly assembled from the
7 Quickbooks and Cab Manager computer files produced by A Cab
8 pursuant to the Court's Order. A Cab has provided no contrary
9 evidence identifying even a single instance in the many thousands
10 of pay periods set forth in the "ACAB ALL" Excel file where it
11 contains either inaccurate information that does not match A Cab's
12 records or incorrect arithmetic calculations. Accordingly, the
13 Court finds that the calculations made by the "ACAB ALL" Excel
14 file are properly relied upon and constitute facts which are
15 undisputed by any evidence to the contrary and may be properly
16 relied upon by the Court, both to establish liability and to establish
17 the amount of damages..

- 18
19 23. Plaintiffs have also furnished to defendants on September 29, 2017
20 an Excel File "Damages 2007-2010" with the Supplemental Expert
21 Report (Declaration) of Charles Bass of September 27, 2017.⁵
22 That "Damages 2007-2010" Excel file, as discussed in the
23 September 27, 2017 declaration of Charles Bass, performs
24 calculations in a fashion identical to the "A CAB ALL" file by
25 allowing the assignment of a uniform "shift length" to every shift
26

27 ⁵ This document, but not the Excel file, is introduced into the record at Ex. "A" of the
28 declaration of class counsel filed on June 20, 2018.

1 worked by a class member during a pay period. It also contains the
2 same information in respect to wages paid and shifts worked for
3 that time period for each pay period for each class member, as
4 taken from A Cab's Quickbooks and Cab Manager computer files.
5 It was assembled using the same process reviewed by Dr. Clauretie
6 and discussed in his report in respect to the "A CAB ALL" file. A
7 Cab has not disputed the accuracy of any calculations made in, or
8 information contained in, the "Damages 2007-2010" Excel file.
9 For the reasons discussed in ¶ 22, the Court finds that the
10 calculations made by the "Damages 2007-2010" Excel file are
11 properly relied upon and constitute facts undisputed by any
12 counter evidence from A Cab.
13

- 14 24. The "ACAB ALL" Excel file, for the 14,200 pay periods it
15 examines for the time period January 1, 2013 through December
16 31, 2015, calculates that the class members' average shift length
17 (average working time per shift) was 9.21 hours. It arrived at that
18 figure based upon A Cab's payroll hours worked Quickbooks
19 records and the total number of shifts class members were recorded
20 as working by A Cab's Cab Manager records. A Cab does not
21 dispute that is an accurate figure and Dr. Clauretie, in his report,
22 verifies its accuracy. A Cab's expert, Scott Leslie, in connection
23 with his rebuttal expert report,⁶ for which he was paid \$47,203,⁷
24

25 ⁶ This report is introduced into the record at Ex. "B" of the declaration of class
26 counsel filed on June 20, 2018 who, in that declaration, also states the particulars
27 contained in the report regarding the average shift length shown by the trip sheet
28 review conducted by Mr. Leslie.

⁷ Ex. "B" of the declaration of class counsel filed on June 20, 2018.

1 undertook to examine the actual trip sheets of class members for 56
2 pay periods between January 1, 2013 and December 31, 2015 and
3 concluded that, on average, each shift worked by each class
4 member during those 56 pay periods consisted of 9.5 hours of
5 working time. He also undertook an examination of the actual trip
6 sheets of class members for 38 pay periods between October 8,
7 2010 and December 31, 2012 and concluded that, on average, each
8 shift worked by each class member during those 38 pay periods
9 consisted of 9.8 hours of working time. He concluded that the
10 average shift length was 9.7 hours of working time for all of the
11 trip sheets he examined for 123 pay periods. Plaintiffs submitted
12 declarations from three class members indicating that class
13 members were, in most instances, assigned to work 12 hour shifts;
14 they typically worked shifts of 11 hours or longer in length after
15 deducting their break time; that class members took few breaks
16 during their shifts or averaged breaks of less than one hour in
17 length during a shift; and unless a taxi broke down a shift was at
18 least 10 hours long. *See*, Ex "F" and "O" plaintiffs' motion for
19 class certification filed May 19, 2015, Ex. "B" of opposition to
20 defendants' motion for summary judgment filed December 14,
21 2017. A Cab, through Nady, pursuant to an NRCP Rule 30(b)(6)
22 deposition notice directed to the topic, testified it could only
23 provide a "guess" as to the average amount of time worked by the
24 class members each shift. *See*, plaintiffs' motion in limine filed
25 December 22, 2017 at Ex. "J" and "K."

26
27 25. Plaintiffs' MPSJ includes the calculations made by the "ACAB
28

1 ALL" Excel file using A Cab's Quickbooks payroll hours for the
2 2013-2015 time period in respect to unpaid minimum wages owed
3 at the \$7.25 an hour "lower tier" minimum wage rate (Column "K"
4 to Ex. "D" to that motion, showing its examination of each of
5 14,200 pay period and consisting of 375 pages). It also includes a
6 consolidated statement of the amount, if any, of unpaid minimum
7 wages owed to each class member at \$7.25 an hour (Column "D" to
8 Ex. "E" listing 548 class members stretching over 19 pages).

9
10 26. Plaintiffs have introduced into the record the following:

- 11
12 (a) The amounts owed at \$7.25 an hour, if any, using the
13 "ACAB ALL" Excel file for the period October 8, 2010
14 through December 31, 2012 for each of 9,759 pay periods
15 and to each of 527 class members when a constant shift
16 length of 9.21 hours per shift is used to make those
17 calculations;⁸
18
19 (b) The amounts owed at \$7.25 an hour, and prior to July 1,
20 2010 at the applicable "lower tier" minimum wage which
21 was less than \$7.25 an hour, if any, using the "Damages
22 2007-2010" Excel file for the period July 1, 2007 through
23 October 7, 2010 for each of 13,948 pay periods and to each
24 of 378 class members when a constant shift length of 9.21
25

26
27 ⁸ These are introduced into the record at Ex. "3" and Ex. "4" to Ex. "C" of the
28 declaration of class counsel filed on June 20, 2018.

hours per shift is used to make those calculations;⁹

- (c) A consolidated chart listing the amounts owed to each class member when the amounts detailed in ¶ 25 and ¶ 26(a) and ¶ 26(b) are combined.¹⁰

27. On November 5, 2014, A Cab and Nady entered into a consent judgment in the United States District Court for the District of Nevada with the United States Department of Labor that provided for the payment by A Cab of \$139,988.80 to resolve certain claims for unpaid minimum wages owed under the Fair Labor Standards Act for the time period October 1, 2010 through October 1, 2012. *See*, Plaintiffs' Motion for Class Certification filed May 19, 2015, Ex. "A." That consent judgment included a list of persons, A Cab employees who are also class members in this case, who were subject to that consent judgment and were to receive portions of such \$139,988.80 payment in amounts determined by the United States Secretary of Labor. *Id.* Such consent judgment does not, by its terms, or by operation of law, either preempt or resolve the MWA claims made in this case. A Cab, in its Answers filed with the Court, has raised a Twenty-Third Affirmative defense of accord and satisfaction. Plaintiffs served an interrogatory request seeking details of that defense, including the amounts paid to the class

⁹ These are introduced into the record at Ex. "1" and Ex. "2" to Ex. "C" of the declaration of class counsel filed on June 20, 2018.

¹⁰ These are introduced into the record at Ex. "5" to Ex. "C" of the declaration of class counsel filed on June 20, 2018.

1 members alleged by A Cab to support such defense.¹¹ A Cab
2 referenced the consent judgment case in its interrogatory answer,
3 but provided no information on the amounts so paid under the same
4 to any particular class members. It also referred to its production
5 of documents that it implied may contain such information.
6 Plaintiffs' counsel asserts it has not been provided with
7 documentation from A Cab of the amounts so paid, in respect to
8 the exact amount paid to each individual involved class member
9 and not the entire \$139,988.80, though it does believe some such
10 amounts were paid.¹²
11

- 12 28. In response to plaintiffs' counsel's assertions regarding the United
13 States Department of Labor ("USDOL") settlement, A Cab, in its
14 "Supplemental Authority In Response to Declaration of June 20,
15 2018," filed on July 10, 2018, asserts it provided relevant
16 documentation regarding that settlement at Response 7 to
17 plaintiffs' Fifth Set of Interrogatories. That response to plaintiffs'
18 request that A Cab specify the amounts paid to each involved class
19 member under the USDOL settlement consists of three words:
20 "Please see attached." A Cab provides "attached" to that
21 interrogatory response seven pages of documents with the names of
22 various persons, and associated amounts that, facially, would seem
23 to indicate a record of payments made to those persons. It offers no
24 explanation, in its interrogatory response, of what those documents
25

26 ¹¹ That interrogatory and defendants' response, No. 26, is introduced into the record at
27 Ex. "D" of the declaration of class counsel filed on June 20, 2018.

28 ¹² This is set forth at ¶ 5 of the declaration of class counsel filed on June 20, 2018.
20.

1 are. Nor in its July 10, 2018 filing did A Cab include any
2 declaration corroborating and authenticating those seven pages of
3 documents that, facially, seem to indicate payments of itemized
4 amounts to certain class members from the USDOL settlement. In
5 a further supplement filed by plaintiffs' counsel on July 13, 2018
6 plaintiffs' counsel noted that A Cab's supplement filed on July 10,
7 2018 lacked any proper corroboration or authentication of the
8 facially relevant documents. Plaintiffs' counsel also noted that
9 those documents only itemized payments totaling \$77,178.87 of the
10 total \$139,988.80 paid under the USDOL settlement, meaning A
11 Cab could not, from those documents, corroborate which class
12 members may have received an additional \$62,800.43 from that
13 settlement. In a further supplement filed on July 18, 2018 A Cab's
14 counsel furnished their declaration (Ex. "F" thereto) purporting to
15 authenticate the previously provided documents from the USDOL
16 and certain additional, and not previously furnished, USDOL
17 documents provided with that supplement.
18

- 19 29. Plaintiffs, upon review of the July 18, 2018 supplement filed by A
20 Cab, filed a further supplement with the Court on August 3, 2018.
21 In that August 3, 2018 Supplement and the Ex. "A" declaration of
22 plaintiffs' counsel thereto, plaintiffs have established to the Court's
23 satisfaction that A Cab has demonstrated the disposition of
24 \$81,852.19 from the USDOL settlement. The Court is further
25 satisfied that Ex. "B" of such supplement, based upon that
26 \$81,852.19 from the USDOL settlement, properly applies a set off
27 in A Cab's favor of the judgment amounts owed to the class
28

1 members previously submitted to the Court and discussed at ¶ 26.
2 As further detailed by that supplement, \$58,136.61 of the
3 \$139,988.80 USDOL settlement paid by A Cab remains
4 unaccounted for. That \$58,136.61 is potentially, in whole or in
5 part, an additional amount that A Cab can set off against the
6 judgments to be awarded by the Court to the class members if A
7 Cab can itemize the amounts of that \$58,136.61 paid to the
8 involved class members.
9

10 DISCUSSION OF RELIEF GRANTED

11 Plaintiffs' Motion for Summary Judgment

12
13
14 The Court notes we are dealing with important rights, important because the
15 people of Nevada have said so by virtue of inserting what would have otherwise been
16 a statutory provision into the Constitution of the State of Nevada. The Court has great
17 respect for the constitutions and constitutional law. The Court believes that they form
18 the basic backbone of the laws and government enumerated therein, both for the
19 United States of America and for the State of Nevada. If the people of this state have
20 said that there is a minimum wage act which entitles employees to be paid a certain
21 amount, in conformity therewith, it is incumbent upon the Court to assure that at the
22 end of the day justice is done, even though the justice that is done turns out to be of a
23 somewhat imprecise nature.

24 Plaintiffs filed three (3) versions of their motion for partial summary judgment
25 (filed on January 11, 2017, November 2, 2017, and April 17, 2018) each of which was
26 opposed by defendants, fully briefed and argued through several hours of oral
27 argument. Although fashioned as a motion for partial summary judgment, by the time
28 22.

1 Plaintiffs reached oral argument on the present motion it became clear that application
2 of their arguments regarding the Quickbooks records and the *Mt. Clemens* rationale
3 effectively resolved not only the period January 1, 2013 to December 31, 2015, but
4 also July 1, 2007 to January 1, 2013, effectively resolving all issues in the case and
5 that therefore final summary judgment is warranted.¹³ The Court finds that because
6 the Defendants could not or would not pay for the special master then pursuant to *Mt.*
7 *Clemens* the burden of proof shifted to the defense. The Court is satisfied that the
8 rationale of the *Mt. Clemens* case not only provides ample authority and justification
9 for this result, but also provides an avenue for this Court to do essential justice to the
10 parties.

11 Even under *Wood v. Safeway, Inc.*, 121 P.3d 1026, 1031 (Nev. 2005), the
12 Defendants, as the nonmoving party, had the burden to “do more than simply show
13 that there is some metaphysical doubt’ as to the operative facts in order to avoid
14 summary judgment being entered in the moving party’s favor.” *Id* quoting *Matsushita*
15 *Elec. Indus. Co., Ltd. v. Zenith Radio Corp.*, 475 U.S. 574, 586 (1986). The Court
16 finds there is an absence of evidence to support the Defendants’ arguments and to
17 demonstrate a triable issue of fact. Defendants failed to transcend the pleadings by
18 putting forth admissible evidence to show a genuine issue of material fact exists given
19 the aforementioned posture of the case. *See Cuzze v. U. and Community College*
20 *System of Nevada*, 172 P.3d 131, 134 (Nev. 2007).

21 Furthermore, under *Mt. Clemens Pottery Co.*, 328 U.S. 680, 687–88 (1946) “the
22 burden then shifts to the employer to come forward with evidence of the precise
23 amount of work performed or with evidence to negative the reasonableness of the
24 _____

25 ¹³ On June 5, 2018, during the hours-long oral argument regarding A Cab’s failure to
26 comply with the Court’s Orders and Plaintiffs’ basis for their calculations, Plaintiffs’
27 counsel moved the Court for summary judgment on the entire case applying an
28 approximation to the time period July 1, 2007, to January 1, 2013, based on A Cab’s
Quickbooks records. 23.

1 inference to be drawn from the employee's evidence. If the employer fails to produce
2 such evidence, the court may then award damages to the employee, even though the
3 result be only approximate.”

4 Upon the filing of plaintiffs’ first motion for partial summary judgment, and its
5 attendant evidence showing the class members performed work for which they were
6 improperly compensated, filed on January 11, 2017, defendants had the burden to
7 either put forth evidence of the precise amount of work performed, or negate the
8 reasonableness of the inference to be drawn by plaintiffs’ evidence in order to create a
9 genuine issue of material fact. *See Anderson v. Mt. Clemens Pottery Co.*, 328 U.S.
10 680, 688 (1946); *see also Wood v. Safeway, Inc.*, 121 P.3d 1026, 1031 (Nev. 2005).
11 However, the defendants have failed to do so. Thus, to ensure a both equitable and just
12 determination of the calculation of damages, the Court appointed a Special Master to
13 review the tripsheets in order to determine the precise amount of damages. However,
14 the defendants failed to comply with the Court’s orders and failed to pay for the
15 special master. Therefore, the Court finds that summary judgment is appropriate as “it
16 would be a perversion of fundamental principles of justice to deny all relief to the
17 injured person[s], and thereby relieve the wrongdoer from making any amend for his
18 acts.” *Anderson v. Mt. Clemens Pottery Co.*, 328 U.S. 680, 688 (1946) quoting *Story*
19 *Parchment Co. v. Paterson Parchment Co.*, 282 U.S. 555, 563, 51 S.Ct. 248, 250, 75
20 L.Ed. 544. Plaintiffs have put forth enough evidence to prove that the class members
21 have performed work and have not been paid in accordance with the MWA; the
22 uncertainty lies only in the amount of damages arising from the Defendants’
23 violations. *See Id.* It is enough for this Court to follow *Mt. Clemens* in that it is enough
24 under these circumstances for this Court to find a reasonable inference as to the extent
25 of the damages and grants summary judgment accordingly as set forth in this order.
26 *See Id.*

27 The Court made effort to provide fair, equitable, and precise justice to the
28

1 drivers and to the defendant business. However, it was the Defendants, through a
2 claimed but unproven inability to pay for the special master, whom continued to
3 frustrate the Court's intent to provide precise justice, thereby requiring the Court to
4 deviate from an exact calculation and instead rely upon an approximation as set forth
5 by *Mt. Clemens*.

6 No disputed triable issues of material fact are presented by A Cab warranting a
7 denial of the plaintiffs' Motion for Summary Judgment. The motions involve a
8 review of every pay period, 14,200 in total, contained in A Cab's Quickbooks records
9 for the time period from January 1, 2013 through December 31, 2015. The question
10 presented by the motions, is whether A Cab during those 14,200 pay periods
11 complied with the MWA during the period in question. The Court is satisfied that
12 information, furnished by A Cab, was accurately placed in the "ACAB ALL" Excel
13 file upon which plaintiffs' rely. The Court is also satisfied that the "ACAB ALL"
14 Excel file performs the correct arithmetical calculation to determine the underpaid
15 minimum wage amount, if any, at \$7.25 an hour, for each of the 14,200 pay periods.
16 The Court is also satisfied it provides an accurate resulting statement of the total
17 amount, if any, owed for that reason to each class member.

18 A Cab's assertions that the amounts calculated and presented by plaintiffs' are
19 unreliable is speculative. A Cab does not set forth even a single instance where the
20 calculations presented in those Exhibits is performed upon information that is not set
21 forth in A Cab's Quickbooks records or that involves erroneous arithmetic. Its
22 opposition to the plaintiffs' MPSJ is based upon pure speculation (or an assertion it
23 should be relieved of its admissions that the Quickbooks records contained accurate
24 information) and the MPSJ is granted.

25 The primary principle upon which the Court relies in entering the judgment
26 specified, *infra*, is derived from *Mt. Clemens*. A Cab cannot successfully oppose the
27 entry of such a judgment in the summary judgment context under the principles set
28

1 forth in *Mt. Clemons*. There is no other practical means by which the Court can
2 resolve the MWA claims in this case, except by applying a reasonable approximation
3 of hours worked to render substantial, though inexact, justice as in *Mt. Clemons*. As
4 discussed in ¶ 24, the Court's application of an average shift length of 9.21 hours to
5 fashion a judgment for the class members under the MWA for the time period prior to
6 January 1, 2013 is a proper, albeit perhaps too favorable to A Cab, application of the
7 *Mt. Clemons* principles. That 9.21 hours long average shift length is taken from the
8 very records (the 2013-2015 Quickbooks records) that defendant Nady swore under
9 oath were *more* accurate than the trip sheets. The class members assert their hours of
10 work per shift were, on average, considerably longer. Defendants' own expert came
11 up with *longer* average shift lengths (9.5 and 9.8 hours) based upon his review of 56
12 and 38 trips sheets for two periods and a 9.7 hours long average shift length for 123
13 pay periods that he studied. A Cab is bound by its NRCP Rule 30(b)(6) testimony
14 that it can only "guess" at the proper average shift length of the class members.
15 Accordingly, it has no competent evidence it can present as to the proper average shift
16 length prior to January 1, 2013 that should be adopted by the Court and applied under
17 *Mt. Clemons*. As a result, plaintiffs' request that the Court, as discussed at the June 5,
18 2018 hearing, enter a final judgment in this matter applying the *Mt. Clemons*
19 principals, and using an average shift length of 9.21 hours for the class members'
20 claims accruing prior to January 1, 2013, is properly adopted by the Court and it is
21 granting a judgment accordingly. Such judgment shall also include interest on each
22 amount as calculated from January 1, 2016 given the difficulty of applying NRS
23 17.130 to all of the class members' MWA claims, some of which did not arise until
24 after the service of the summons and complaint.¹⁴ there is no material issue of fact
25

26
27 ¹⁴ The judgment amounts, with interest, so calculated for each class member are at
28 Column "G" of Ex. "5" to Ex. "C" of class counsel's declaration of June 20, 2018, that
chart being annexed hereto as Ex. "A." 26.

1 that A Cab can dispute in respect to the Court's entry of judgment using the *Mt.*
2 *Clemons* principles given A Cab's inability to proffer any competent evidence on the
3 class members' average shift length prior to January 1, 2013.

4 A Cab's assertion, made in its affirmative defense and interrogatory response,
5 that it is entitled to some measure of satisfaction of the class members' MWA claims
6 based upon the payments it made under the U.S. Department of Labor's consent
7 judgment (§ 27) would be properly ignored as a sanction. Such action by the Court
8 would be justified and appropriate in light of A Cab's documented litigation abuses in
9 this case and its failure to properly respond to plaintiffs' interrogatory seeking such
10 information. Such action by the Court would also be justified in light of its need to
11 enter a judgment under the *Mt. Clemons* principles in response to A Cab's conduct, a
12 judgment that does not afford the class members the full, and precise, measure of
13 justice they would be entitled to, and receive, if A Cab had complied with NRS
14 608.115(1)(d). In the exercise of discretion, the Court will, nonetheless, afford A Cab
15 an opportunity to proffer proof of such payments post judgment and receive
16 appropriate satisfactions of the judgment amounts entered by this Order for the
17 involved class members. The Court will not delay entry of final judgment over this
18 issue, involving a potential offset to A Cab of less than 20% of the amount it is
19 awarding to the class, and only involving claims accruing to certain identified class
20 members during the period October 1, 2010 to October 1, 2012. But it has fashioned,
21 *infra*, provisions that afford A Cab a very fair opportunity to receive the offset it
22 claims from the consent judgment.

23 In connection with the MPSJ the plaintiffs have asked that the Court forego
24 entering judgment in favor of any class member when the amount so indicated by Ex.
25 "E" to the MPSJ is less than \$10.00, on the basis that amounts of under \$10.00 are *de*
26 *minimis*. Accordingly, the final judgment to be entered in this case for the amount of
27 unpaid minimum wages owed to the class members for the period January 1, 2013

1 through December 31, 2015 shall be the amounts calculated to be owed to every class
2 member in Column "D" of Ex. "E" of the MPSJ if such amount is at least \$10.00. As
3 discussed at ¶ 25 and ¶ 26 plaintiffs have introduced into the record calculations
4 showing the total amount (if any) owed to each A Cab taxi driver in unpaid minimum
5 wages for the January 1, 2013 through December 31, 2015 time period, based upon
6 the Quickbooks time worked records as sought in the MPSJ, and for the period of time
7 from July 1, 2007 through January 1, 2013 based upon the application of *Mt. Clemons*
8 principles as discussed further *infra*. The Court has found those calculations to be
9 accurate as discussed at ¶¶ 19-24. Accordingly, attached to this Order as Ex. "A," as
10 discussed further, *infra*, are the total amounts the Clerk of the Court shall enter as
11 Judgment amounts for each class member.¹⁵ Those total owed amounts are based
12 upon the reasoning of the MPSJ which is adopted by the Court to grant judgment to
13 the class members for the period January 1, 2013 through December 31, 2015 and the
14 application of the *Mt. Clemons* principles for the time period prior to January 1, 2013.

15
16 **Plaintiffs' Motion to Hold Defendants in Contempt for Their Violation**
17 **of the Court's Prior Orders Appointing a Special Master and Striking**
18 **Defendants' Answer and Directing a Prove Up Hearing.**

19 Alternatively, given the deference this Court must give in enforcing the
20 Constitution of the State of Nevada, the Court finds that Defendants' persistent failure
21 to comply with Court orders, and for reasons stated herein, warrants holding
22 defendants in contempt and striking their answer. Plaintiffs have argued strenuously
23 for the Court to strike Defendants' answer and award judgment accordingly. While
24 this Court has been at pains to resolve important issues without resort to sanctions, the
25 Court cannot avoid the conclusion that if other, less drastic bases were not available, it

26
27
28 ¹⁵ These amounts are the same amounts as Ex. "5" to Ex. "C" of the declaration of class
counsel filed on June 20, 2018 28.

1 would proceed by way of sanction, strike the answer, and award judgment to
2 Plaintiffs.¹⁶

3
4 Accordingly, the following alternative basis is offered.

5
6 While Plaintiffs' Motion uses the term contempt it does not seek an arrest for
7 civil contempt but an appropriate remedy, sanction, against A Cab for its failure to
8 comply with the Court's Orders appointing a Special Master. If those Orders had been
9 complied with, the Special Master's work would now be complete. The Court would
10 be proceeding to fashion an appropriate final judgment for the class members based
11 upon that report and the precise findings, in respect to the hours of work, wages paid,
12 and minimum wage amounts owed to the class members, it would have contained. A
13 Cab's failure to comply with those Orders has prevented that result. Plaintiffs do not
14 propose an order of civil contempt and imprisonment against defendant Nady, A Cab's
15 principal, as a remedy for that failure. Nor does the Court believe such an Order,
16 while within the Court's power, is sensible or will serve the interests of justice. As the
17 Plaintiffs' Motion requests, the Court should fashion some sort of alternative relief,
18 and judgment, that will resolve this litigation and render substantial justice, albeit not
19 in the precise form that would have been arrived at if A Cab had complied with the
20 Court's Orders appointing the Special Master.

21 The Court has inherent power to appropriately sanction, and tailor remedies for,
22 _____

23
24 ¹⁶ The Court finds no prove up hearing is necessary under NRCp Rule 55(b)(2) as A
25 Cab admits it has no evidence to present on the proper average shift length to be used
26 by the Court in fashioning a judgment. The Court also finds A Cab is properly
27 prohibited from presenting further evidence on the proper amount of a default
28 judgment even if it possessed any germane evidence on that issue as a sanction under
Young for the reasons already stated. See, *Blanco v. Blanco*, 311 P.3d 1170, 1176
(Nev. Sup. Ct. 2013) citing *Foster v. Dingwall*, 227 P.3d 1042, 1050 (Nev. Sup. Ct.
2010) (Recognizing such a sanction is proper under *Young*).

1 violations of its Orders and in response to a party's improper conduct. *See, Young v.*
2 *Johnny Ribeiro* 787 P.2d 777, 779 (Nev. Sup. Ct. 1990) ("Litigants and attorneys alike
3 should be aware that these [inherent] powers may permit sanctions for discovery and
4 other litigation abuses not specifically proscribed by statute.") As discussed in *Young*
5 and the subsequent cases from the Nevada Supreme Court that follow *Young*, this
6 Court should make appropriately detailed and thoughtful written findings when
7 imposing such sanctions, which can include the striking of an answer and the granting
8 of a default judgment. Some of the factors the Supreme Court has said may be
9 considered in determining whether to impose such sanctions are the degree of
10 willfulness of the offending party, the feasibility and fairness of lesser sanctions, and
11 the prejudice sustained by the non-offending party. *Id.*, 787 P.2d at 780. It is also
12 apparent from *Bahena v. Goodyear Tire & Rubber Co.*, 235 P.3d 592, 599 (Nev. Sup.
13 Ct. 2010) citing and quoting *Foster v. Dingwall*, 227 P.3d 1042, 1047, 1048 (Nev.
14 Sup. Ct. 2010) that a demonstrated course of "repetitive, abusive and recalcitrant"
15 conduct by a party can justify the imposition of such sanctions. *Bahena*, further
16 discussing *Foster* and approving of its holding, also stated: "[w]e further concluded
17 [in *Forster*] that entries of complete default are proper where "litigants are
18 unresponsive and engaged in abusive litigation practices that cause interminable
19 delays." *Id.*

20 The Court concludes that the record in this case is sufficient under *Young* and
21 the other controlling precedents to warrant an award of relief in the form requested by
22 plaintiffs, a striking of defendant A Cab's answer and the entry of a default judgment.
23 A Cab's improper conduct in violating the Court's Orders appointing a Special Master
24 is not an isolated incident but "repetitive." Its prior history of improper conduct is
25 discussed in ¶ 15. That improper conduct has also caused "interminable delays" in the
26 production of A Cab's critically important Cab Manager and Quickbooks records,
27 delays A Cab may well have intended to foster in pursuit of an NRCP Rule 41(e)

1 dismissal. The willfulness of A Cab in disregarding the Court's Orders appointing a
2 Special Master is apparent and A Cab's assertion its failure to comply with those
3 Orders is a result of a financial inability to pay the Special Master cannot be properly
4 considered and its evidence to establish same is deficient. If A Cab truly lacks the
5 financial resources to comply with those Orders it has a remedy under the United
6 States Bankruptcy Code to seek the protection of the Bankruptcy Court which is
7 empowered to relieve it from those Orders and oversee the proper disposition of
8 whatever financial resources it does possess. It has declined to do so and continues to
9 do business and defend this case in this Court. Having elected to do so, it must
10 comply with this Court's Orders or face the consequences of its failure to do so.

11 If the Court did not grant summary judgment pursuant to the burden shifting
12 under Mt. Clemens, the Court would find there are no feasible or fair lesser sanctions
13 that it can properly impose in lieu of the judgment it is granting *infra*, and the
14 prejudice sustained by the non-offending party in this case, the class members, would
15 be too great if it failed to grant that judgment. A Cab has violated its obligations
16 under NRS 608.115(1)(d), obligations which, if met, would allow the Court to render
17 full, complete, and precise justice in this matter on the class members' MWA claims.
18 In response to that violation, the Court directed A Cab to pay a Special Master to
19 correct such deficiencies in its NRS 608.115(1)(d) compliance. It has failed to do so
20 and proposed no alternative approach to bring this case to a proper conclusion. The
21 Court cannot envision any sanction or any other feasible means to justly and properly
22 redress constitutional grievances, and resolve this case under the circumstances
23 presented, except through directing entry of the judgment specified, *infra*.

24 The prejudice that would inure to the class members if the Court failed to enter
25 the judgment specified, *infra*, is manifest and extreme. A Cab's proposal that the
26 Court await the outcome of other proceedings that may or may not impact some
27 amount of the class members' claims seeks to have the Court abdicate its

1 responsibility to hear and resolve the claims before it, something it cannot do.
2 Alternatively, A Cab postures it is entitled to rely on its failure to create the records
3 required by NRS 608.115(1)(d) and place upon the plaintiffs the burden, which they
4 should not have to meet and clearly cannot meet, to specify from their trip sheets their
5 precise hours of work for each pay period. Indeed, A Cab paid its expert in excess of
6 \$47,000 to produce a report asserting that position in its defense.

7 Despite plaintiffs' warranted request to hold defendants in contempt and strike
8 their answer, the Court has not viewed this as warranted to remedy this point, and
9 therefore has declined to do so. As an alternative ruling, the Court is prepared to do so
10 now.

11 12 **THE COURT'S JUDGMENT AND THE RELIEF ORDERED**

13
14 For the foregoing reasons, the Court hereby Orders the following relief and
15 enters a Final Judgment in this case in the following form:

- 16
17 A. The Court, pursuant to NRCP Rule 23(c)(1) amends the class claims
18 certified for disposition pursuant to NRCP Rule 23(b)(3). Those claims,
19 in respect to defendant A Cab, are now limited to the claims of the
20 previously identified class members arising under the MWA against A
21 Cab prior to January 1, 2016 but only to the extent A Cab failed to pay
22 such class members the "lower tier" (health benefits provided) minimum
23 wage required by the MWA; only in the amounts specified and arrived at
24 in this Order based upon the hours of work used by the Court to
25 determine such amounts; and only for interest owed on those claims on
26 and after January 1, 2016. Individual class members who seek to collect
27 "higher tier" minimum wage payments under the MWA; or amounts
28

1 owed under the MWA based upon them having actually worked more
2 hours in a pay period than the Court used in making the award to them in
3 this Order; or to collect the penalties proscribed by NRS 608.040; or for
4 additional amounts in interest that may be owed to them on their MWA
5 claims from A Cab may pursue those claims individually. Such claims
6 are dismissed from this case for all class members without prejudice;
7

8 B. All claims made against the defendant Nady are severed from the claims
9 against A Cab pursuant to NRCP Rule 21;
10

11 C. The Clerk of the Court shall enter judgment for each individual class
12 member in the amount specified in Column "F" in Ex. "A" as annexed
13 hereto against defendants A CAB TAXI SERVICE LLC and A CAB,
14 LLC. Such judgment shall conclude the class claims for damages
15 certified for disposition pursuant to NRCP Rule 23(b)(3) and constitute a
16 final judgment on such claims;
17


18 D. The Court retains continuing jurisdiction over the class claims it has
19 certified for disposition pursuant to NRCP Rule 23(b)(2), and for
20 enforcement of the monetary judgments it has rendered in favor of the
21 class members, and appoints class counsel, Leon Greenberg, Dana
22 Sniegocki, Christian Gabroy and Kaine Messer, as counsel for the class
23 member judgment creditors listed on Exhibit "A" and for whom the Court
24 is directing entry of judgment. Defendants, their agents, and their
25 attorneys, are prohibited from communicating with the class member
26 judgment creditors about their judgments granted by this Order or
27 securing any release or satisfaction of those judgments without first
28

1 securing a further Order of this Court in this case. Class counsel is
2 authorized to proceed with whatever remedies it deems advisable to
3 enforce the money judgments rendered for the class members but shall
4 hold in their IOLTA account any amounts collected on such judgments
5 and only release such monies as specified by a further Order of this Court
6 in this case. Class counsel is also authorized to use all of the judgment
7 enforcement remedies provided for by NRS Chapter 21 in the name of
8 "Michael Murray as Judgment Creditor" for the total amount of the
9 unsatisfied judgments rendered in favor of all class members, they need
10 not seek or issue writs of judgment execution or levy individually for
11 each judgment creditor class member. Class counsel is also prohibited, in
12 light of the potential for A Cab to receive satisfaction of certain judgment
13 amounts as provided for under G, *infra*, until further Order is issued by
14 the Court, from taking action to collect more than \$960,000 of the
15 combined judgment value of \$1,033,027.81 that is entered under this
16 Order;

- 17
- 18 E. The time for class counsel to apply for an award of fees and costs
19 pursuant to NRCP Rule 54 is extended to 60 days after the service of this
20 Order with Notice of Entry;
- 21
- 22 F. The court stays the severed case against defendant Nady for 60 days from
23 the date of entry of this Order. That case shall remain stayed after that
24 date until the Court issues an Order lifting such stay, the Court not
25 anticipating doing so, or receiving any request from the parties to do so,
26 until expiration of that 60 day period.
- 27

1 G. A Cab may present to the Court, at anytime after entry of this Order, a
2 motion to have the Court enter satisfactions towards each class member
3 judgment creditor's judgment amount for the amounts A Cab paid them
4 under the consent judgment that are a portion of the \$58,136.61 paid
5 under the consent judgment but not previously accounted for (§ 29). . It
6 shall also have the right, within 60 days from the date of service of this
7 Judgment and Order with Notice of Entry, to present to class counsel
8 evidence of how the \$58,136.61 paid under the consent judgment but not
9 previously accounted for (§ 29) should be set off against each class
10 member judgment creditor. Class counsel shall be obligated to advise A
11 Cab within 30 days thereafter if it agrees that A Cab it is entitled to a
12 judgment satisfaction based upon such evidence. If it so agrees, class
13 counsel must submit a motion to the Court within 10 days thereafter
14 seeking an Order entering such agreed upon satisfactions. If after that
15 date A Cab, after completing that process of conferral with class counsel,
16 must still file a motion with the Court to secure any such judgment
17 satisfactions, the Court will, if it grants that motion and also finds class
18 counsel did not act reasonably in cooperating with A Cab on determining
19 the amount of the satisfactions, award A Cab attorney's fees in connection
20 with the bringing of such a motion.
21

22 **IT IS SO ORDERED.**

23
24 
25 Honorable Kenneth Cory
26 District Court Judge
27
28

Date 8-21-18

EXHIBIT "A"

003984

003984

	A	B	C	D	E	F	G
1	Totals for All Class Members			\$900,317.34	\$132,710.47	\$1,033,027.81	\$975,000.00
2	EE Number	Last Name	First Name	Total Lower Tier Minimum Wages Owed 7/1/2007 - 12/31/2015 After Set Off and Over \$10.00	Interest from 1/1 2016 through 6/30/2018	Total with Interest	Total 2016 Shortfall
3	3861	Abarca	Enrique	\$815.12	\$120.15	\$935.27	
4	3638	Abdella	Juhar	\$178.63	\$26.33	\$204.96	
5	3331	Abdulahi	Faud	\$286.07	\$42.17	\$328.23	
6	105408	Abdulle	Abdirashid	\$165.36	\$24.38	\$189.74	
7	3606	Abebe	Tamrat	\$3,010.66	\$443.78	\$3,454.44	\$
8	3302	Abraha	Tesfalem	\$669.17	\$98.64	\$767.81	
9	105813	Abt	Daniel	\$891.35	\$131.39	\$1,022.74	
10	2640	Abuel	Alan	\$148.52	\$21.89	\$170.41	
11	3513	Abuhay	Fasil	\$529.05	\$77.98	\$607.03	
12	100221	Ackman	Charles	\$385.21	\$56.78	\$441.99	
13	3853	Acosta	Lorrie	\$135.08	\$19.91	\$154.99	
14	3257	Adam	Elhadi	\$522.90	\$77.08	\$599.98	
15	3609	Adamian	Robert	\$794.61	\$117.13	\$911.74	
16	3896	Adams	Michael	\$193.46	\$28.52	\$221.98	
17	3641	Adamson	Nicole	\$1,012.32	\$149.22	\$1,161.54	\$
18	3035	Adem	Sued	\$731.28	\$107.79	\$839.07	
19	25411	Adhanom	Tewoldebrhan	\$124.16	\$18.30	\$142.46	
20	3846	Agacevic	Ibnel	\$299.99	\$44.22	\$344.21	
21	100821	Agostino	Nicholas	\$1,436.35	\$211.72	\$1,648.07	\$
22	3684	Ahmed	Ahmed	\$926.12	\$136.51	\$1,062.63	\$
23	3678	Alemayehu	Tewodros	\$42.09	\$6.20	\$48.30	
24	3692	Alessi	Anthony	\$13.62	\$2.01	\$15.63	
25	3712	Alexander	Darvious	\$63.13	\$9.30	\$72.43	
26	3869	Alfaro	Joe	\$300.71	\$44.33	\$345.03	

	A	B	C	D	E	F	G
27	3661	Ali	Abraham	\$2,224.87	\$327.95	\$2,552.82	\$
28	104525	Allegue	Yusnier	\$1,414.77	\$208.54	\$1,623.31	\$
29	2903	Allen	Otis	\$9,556.92	\$1,408.73	\$10,965.65	\$
30	25979	Alnaif	Abdul	\$926.14	\$136.52	\$1,062.65	
31	3787	Altamura	Vincent	\$503.89	\$74.28	\$578.17	
32	103822	Alvarado	Santiago	\$94.08	\$13.87	\$107.95	
33	3106	Alvero	Jose	\$105.62	\$15.57	\$121.18	
34	3769	Alves	Mary	\$988.61	\$145.72	\$1,134.33	
35	2968	Amato	Richard	\$4,000.14	\$589.64	\$4,589.78	\$
36	3645	Ameha	Samuale	\$244.82	\$36.09	\$280.91	
37	24038	Anantagul	Kamol	\$154.39	\$22.76	\$177.15	
38	3564	Anastasio	James	\$111.24	\$16.40	\$127.63	
39	2834	Anders	Matthew	\$417.90	\$61.60	\$479.50	
40	29709	Andersen	Jason	\$1,224.18	\$180.45	\$1,404.63	\$
41	3672	Anderson	Roosevelt	\$2,114.65	\$311.71	\$2,426.36	\$
42	106828	Anderson	Calvin	\$1,353.44	\$199.50	\$1,552.95	\$
43	3943	Anderson	William	\$289.40	\$42.66	\$332.06	
44	3650	Anif	Janeid	\$1,406.55	\$207.33	\$1,613.88	\$
45	2662	Antoine	Albert	\$310.19	\$45.72	\$355.91	
46	2942	Appel	Howard	\$23.47	\$3.46	\$26.93	
47	3614	Applegate	Angela	\$260.97	\$38.47	\$299.44	
48	3730	Arar	Isam	\$1,726.82	\$254.54	\$1,981.36	\$
49	104910	Archer	Bert	\$362.37	\$53.41	\$415.78	
50	3037	Archuleta	Alex	\$2,031.51	\$299.45	\$2,330.96	\$
51	3709	Arell	Roger	\$42.41	\$6.25	\$48.66	
52	3931	Arena	Francis	\$527.13	\$77.70	\$604.83	
53	26553	Arnwine	Howard	\$2,020.90	\$297.89	\$2,318.78	\$
54	2439	Artigue	David	\$315.09	\$46.45	\$361.53	
55	3676	Asad	Tassawar	\$28.49	\$4.20	\$32.69	
56	31622	Asefa	Wossen	\$456.31	\$67.26	\$523.57	
57	3828	Aseffa	Mulubahan	\$1,992.18	\$293.66	\$2,285.84	\$
58	3741	Assena	Zenebech	\$41.86	\$6.17	\$48.02	
59	3873	Atanasov	Nikolay	\$154.17	\$22.73	\$176.90	

	A	B	C	D	E	F	G
60	3406	Atoigue	Marco	\$259.34	\$38.23	\$297.57	
61	3825	Atterbury	Joseph	\$159.92	\$23.57	\$183.49	
62	110476	Auberry Jr.	Glenn	\$309.98	\$45.69	\$355.67	
63	2432	Auckerman	Katherine	\$215.32	\$31.74	\$247.06	
64	3667	Aurich	Juan	\$1,489.26	\$219.52	\$1,708.78	\$
65	2926	Awalom	Alemayehu	\$8,201.42	\$1,208.92	\$9,410.35	\$
66	3707	Azmoudeh	Bobby	\$208.23	\$30.69	\$238.92	
67	3605	Azzouay	El	\$135.48	\$19.97	\$155.45	
68	20210	Ba	Awa	\$1,270.02	\$187.21	\$1,457.22	\$
69	2555	Babinchak	Blaine	\$15.52	\$2.29	\$17.80	
70	108404	Baca	James	\$105.93	\$15.61	\$121.54	
71	27358	Baca-Paez	Sergio	\$2,124.87	\$313.21	\$2,438.08	\$
72	2708	Badillo	Cesar	\$280.24	\$41.31	\$321.55	
73	3130	Bafrdu	Solomon	\$221.55	\$32.66	\$254.21	
74	3838	Baker	Timothy	\$2,135.81	\$314.83	\$2,450.64	\$
75	27315	Bakhtiari	Marco	\$2,118.28	\$312.24	\$2,403.53	\$
76	112015	Bambenek	Matthew	\$337.56	\$49.76	\$387.31	
77	112193	Bandi	Pedram	\$11.21	\$1.65	\$12.86	
78	2523	Banuelos	Ruben	\$150.22	\$22.14	\$172.36	
79	3909	Barbu	Ion	\$2,507.70	\$369.64	\$2,877.34	\$
80	3760	Bardo	Timothy	\$746.65	\$110.06	\$856.71	
81	3369	Barich	Edward	\$1,270.10	\$187.22	\$1,457.31	\$
82	100158	Barnes	Benjamin	\$5,936.88	\$875.12	\$6,812.00	\$
83	2993	Barr	Kenneth	\$574.03	\$84.61	\$658.64	
84	107792	Barrameda	Danilo	\$56.83	\$8.38	\$65.20	
85	3601	Barseghyan	Artur	\$373.48	\$55.05	\$428.54	
86	3887	Barstow	Lance	\$131.44	\$19.37	\$150.81	
87	3829	Bartunek	Johnny	\$19.47	\$2.87	\$22.34	
88	3649	Bataineh	Ali	\$218.35	\$32.18	\$250.53	
89	2454	Batista	Eugenio	\$49.03	\$7.23	\$56.25	
90	3926	Bauer	William	\$217.42	\$32.05	\$249.47	
91	2063	Bean	Ronald	\$214.50	\$31.62	\$246.12	
92	2786	Bekele	Abraham	\$77.01	\$11.35	\$88.36	

	A	B	C	D	E	F	G
93	2856	Bell	Arthur	\$328.15	\$48.37	\$376.52	
94	25454	Bell	Jeffrey	\$26.45	\$3.90	\$30.34	
95	3594	Bellegarde	Josue	\$11.51	\$1.70	\$13.21	
96	3622	Benel	Christian	\$1,457.21	\$214.80	\$1,672.01	\$
97	110687	Berger	James	\$58.09	\$8.56	\$66.65	
98	103219	Berichon	Mike	\$947.14	\$139.61	\$1,086.75	
99	23373	Bey	Ronald	\$3,483.14	\$513.43	\$3,996.57	\$
100	2960	Bialorucki	Richard	\$6,538.58	\$963.81	\$7,502.40	\$
101	2986	Black	Burton	\$1,658.10	\$244.41	\$1,902.51	\$
102	29914	Bliss	Valerie	\$124.09	\$18.29	\$142.38	
103	112455	Blum III	Arthur	\$47.07	\$6.94	\$54.01	
104	3072	Blumenthal	Alan	\$1,925.31	\$283.80	\$2,209.10	\$
105	3101	Bly	Vertito	\$3,955.45	\$583.05	\$4,538.50	\$
106	3180	Bolden	Quincy	\$284.99	\$42.01	\$327.00	
107	2487	Boling	Freddy	\$2,571.76	\$379.09	\$2,950.85	\$
108	2814	Booth	Sean	\$643.34	\$94.83	\$738.17	
109	2802	Borja	Virginia	\$3,665.99	\$540.38	\$4,206.37	\$
110	3003	Borowski	Edwin	\$227.27	\$33.50	\$260.77	
111	3723	Bowen	Christopher	\$674.72	\$99.46	\$774.17	
112	2767	Boyd	Kevin	\$862.73	\$127.17	\$989.90	
113	3508	Bozic	Nebojsa	\$1,242.08	\$183.09	\$1,425.17	\$
114	28324	Bradley	Leroy	\$2,391.80	\$352.56	\$2,744.36	\$
115	2056	Brauchle	Michael	\$6,402.82	\$943.80	\$7,346.62	\$
116	3254	Breault	Ronald	\$208.05	\$30.67	\$238.72	
117	2806	Brennan	Sheila	\$78.89	\$11.63	\$90.52	
118	3697	Briggs	Andrew	\$52.36	\$7.72	\$60.08	
119	3716	Brimhall	Tracy	\$3,804.84	\$560.85	\$4,365.69	\$
120	3621	Brisco	Allen	\$3,226.36	\$475.58	\$3,701.93	\$
121	100299	Briski	Louis	\$704.15	\$103.79	\$807.94	
122	110579	Brooks	Jose	\$46.30	\$6.83	\$53.13	
123	3067	Brown	Maurice	\$1,528.59	\$225.32	\$1,753.91	\$
124	3949	Brown	Daniel	\$730.19	\$107.63	\$837.82	
125	2704	Buergey	Christopher	\$1,051.28	\$154.96	\$1,206.24	\$

	A	B	C	D	E	F	G
126	28249	Bunns	Tommy	\$564.89	\$83.27	\$648.16	
127	3340	Burgema	Kelemework	\$1,408.98	\$207.69	\$1,616.67	\$
128	111670	Burns	Brittany	\$122.95	\$18.12	\$141.08	
129	3327	Butler	Bonnie	\$984.83	\$145.17	\$1,129.99	
130	3160	Butts	Phillip	\$315.09	\$46.45	\$361.54	
131	3537	Cadman	Linda	\$43.84	\$6.46	\$50.31	
132	109309	Caldwell Jr	Paul	\$364.22	\$53.69	\$417.90	
133	3892	Calise	Domenic	\$57.13	\$8.42	\$65.55	
134	3791	Cancio-Bet	Rene	\$282.86	\$41.69	\$324.55	
135	3070	Canelstein	Glen	\$168.33	\$24.81	\$193.14	
136	106463	Capone	Gary	\$1,177.79	\$173.61	\$1,351.40	\$
137	3733	Carr	Jamaal	\$127.11	\$18.74	\$145.84	
138	2660	Carracedo	Sonny	\$380.97	\$56.16	\$437.13	
139	3899	Casiello	Anthony	\$552.19	\$81.39	\$633.58	
140	102334	Castellano	Joaquin	\$419.56	\$61.84	\$481.40	
141	2850	Castillo	Franzes	\$32.11	\$4.73	\$36.84	
142	2740	Cater	Leslie	\$863.76	\$127.32	\$991.09	
143	3463	Catoera	Nestor	\$327.05	\$48.21	\$375.25	
144	2531	Catoggio	Alfred	\$143.11	\$21.10	\$164.21	
145	3843	Caymite	Luc	\$221.02	\$32.58	\$253.60	
146	2907	Cease	Alan	\$367.94	\$54.24	\$422.18	
147	2969	Champigny	Paul	\$133.62	\$19.70	\$153.31	
148	104310	Chana	Chen	\$658.00	\$96.99	\$754.99	
149	3420	Chang	Yun-Yu	\$1,093.43	\$161.18	\$1,254.60	\$
150	3831	Charouat	Malek	\$412.11	\$60.75	\$472.86	
151	24737	Charov	Ivaylo	\$67.83	\$10.00	\$77.83	
152	3663	Chasteen	Jeffery	\$38.80	\$5.72	\$44.52	
153	3714	Chatrizeh	Shahin	\$744.82	\$109.79	\$854.61	
154	2420	Chau	Phi	\$45.97	\$6.78	\$52.74	
155	112394	Chavez	Rosemarie	\$13.29	\$1.96	\$15.25	
156	3249	Chico	David	\$3,982.14	\$586.98	\$4,569.12	\$
157	3258	Child	Gregg	\$232.80	\$34.32	\$267.11	
158	3729	Choudhary	Krishna	\$1,694.88	\$249.83	\$1,944.71	\$

	A	B	C	D	E	F	G
159	3588	Christense	Rosa	\$1,878.35	\$276.88	\$2,155.22	\$
160	3881	Christodou	Panos	\$584.13	\$86.10	\$670.23	
161	26783	Clark	Dennis	\$513.57	\$75.70	\$589.27	
162	31467	Clarke	Michael	\$69.42	\$10.23	\$79.65	
163	2994	Clift	Daniel	\$519.14	\$76.52	\$595.67	
164	2679	Clores	Edgardo	\$363.66	\$53.60	\$417.26	
165	107430	Cobon	Karl	\$1,023.14	\$150.81	\$1,173.95	\$
166	3802	Cobos	Aaron	\$258.72	\$38.14	\$296.85	
167	3885	Cohoon	Thomas	\$2,087.12	\$307.65	\$2,394.77	\$
168	3552	Coizeau	Leonardo	\$3,285.52	\$484.30	\$3,769.81	\$
169	2527	Colello	Robert	\$123.39	\$18.19	\$141.58	
170	3321	Collier	Samuel	\$326.95	\$48.19	\$375.15	
171	102415	Collier	Ella	\$293.00	\$43.19	\$336.19	
172	3862	Collins	Lincoln	\$408.91	\$60.27	\$469.18	
173	2676	Collins	Donald	\$297.17	\$43.80	\$340.97	
174	2481	Colon	James	\$999.75	\$147.37	\$1,147.12	
175	108041	Comeau	Brian	\$70.76	\$10.43	\$81.19	
176	3596	Conde	Carlos	\$103.01	\$15.18	\$118.19	
177	3900	Coney-Cun	Keisha	\$531.04	\$78.28	\$609.32	
178	3738	Conway	James	\$3,480.75	\$513.08	\$3,993.82	\$
179	3546	Cook	Eugene	\$1,466.17	\$216.12	\$1,682.29	\$
180	3284	Cook	Robert	\$1,223.89	\$180.41	\$1,404.29	\$
181	112398	Corona	Fernando	\$775.97	\$114.38	\$890.35	
182	2051	Costello	Brad	\$2,277.69	\$335.74	\$2,613.44	\$
183	3550	Craddock	Charles	\$1,473.65	\$217.22	\$1,690.87	\$
184	3935	Craffey	Richard	\$672.27	\$99.09	\$771.36	
185	23774	Crawford	Darryl	\$395.48	\$58.29	\$453.77	
186	21457	Crawford	Maximillian	\$156.56	\$23.08	\$179.64	
187	30300	Cruz-Decas	Antonio	\$47.37	\$6.98	\$54.35	
188	3301	Csorba	Laszlo	\$512.50	\$75.54	\$588.04	
189	109796	Curtin	Ronald	\$1,891.68	\$278.84	\$2,170.52	\$
190	109130	Dacayanan	Liza	\$515.01	\$75.91	\$590.92	
191	23948	Daffron	Daniel	\$1,242.13	\$183.10	\$1,425.23	\$

	A	B	C	D	E	F	G
192	32238	Daggett Jr.	Rudolph	\$618.68	\$91.20	\$709.87	
193	3231	Dagley	Darryl	\$429.11	\$63.25	\$492.36	
194	3777	Daniels	Donald	\$3,274.58	\$482.69	\$3,757.26	\$
195	3480	Daniels	Katherine	\$645.94	\$95.21	\$741.15	\$
196	110936	Daniels	James	\$57.14	\$8.42	\$65.56	
197	3511	Danielsen	Danny	\$508.57	\$74.97	\$583.54	
198	3428	D'Arcy	Timothy	\$5,450.15	\$803.37	\$6,253.52	\$
199	101103	Davila-Ron	Monica	\$58.85	\$8.67	\$67.52	
200	28065	Davis	Bradley	\$2,249.11	\$331.53	\$2,580.64	\$
201	2590	Davis	Nancy	\$71.07	\$10.48	\$81.54	
202	3419	Degefa	Dejene	\$385.27	\$56.79	\$442.06	
203	3548	Degracia	Bob	\$342.00	\$50.41	\$392.42	
204	3675	Deguzman	Leloi	\$619.41	\$91.30	\$710.71	
205	2573	Deguzman	Fermin	\$294.22	\$43.37	\$337.59	
206	3027	Dein	Fred	\$97.00	\$14.30	\$111.29	
207	111137	Dejacto	Giovanna	\$660.42	\$97.35	\$757.77	
208	25935	Delgado	Carlos	\$105.26	\$15.52	\$120.78	
209	2057	DeMarco	William	\$581.36	\$85.69	\$667.05	
210	3566	Deocampo	Michael	\$198.88	\$29.31	\$228.19	
211	3936	Dial	Donald	\$811.92	\$119.68	\$931.60	
212	111062	Diamond	Jeffrey	\$273.19	\$40.27	\$313.46	
213	3719	Diaz	Aiser	\$22.90	\$3.38	\$26.28	
214	3657	Dibaba	Desta	\$958.68	\$141.31	\$1,099.99	
215	3905	Dillard	Corey	\$904.27	\$133.29	\$1,037.56	
216	2031	Dinok	Ildiko	\$3,031.54	\$446.86	\$3,478.41	\$
217	6832	Dionas	John	\$87.73	\$12.93	\$100.66	
218	3756	Disbrow	Ronald	\$2,475.64	\$364.92	\$2,840.56	\$
219	3395	Dixon	Julius	\$702.55	\$103.56	\$806.11	
220	2812	Djapa-Ivos	Davor	\$1,028.61	\$151.62	\$1,180.23	\$
221	3704	Dobszewic	Gary	\$2,278.69	\$335.89	\$2,614.57	\$
222	3024	Donahoe	Stephen	\$998.20	\$147.14	\$1,145.34	
223	2811	Donleycott	Kevin	\$622.75	\$91.80	\$714.55	
224	3478	Dontchev	Nedeltcho	\$3,455.50	\$509.36	\$3,964.86	\$

	A	B	C	D	E	F	G
225	3378	Dotson	Eugene	\$590.77	\$87.08	\$677.85	
226	3830	Dotson	Contessa	\$49.54	\$7.30	\$56.84	
227	2067	Doughty	Michael	\$308.33	\$45.45	\$353.78	
228	2919	Downing	Jennifer	\$133.31	\$19.65	\$152.96	
229	2839	Downs	David	\$324.58	\$47.85	\$372.43	
230	106763	Doyle	William	\$304.91	\$44.94	\$349.85	
231	2871	Draper	Ivan	\$5,002.36	\$737.37	\$5,739.72	\$
232	2874	Dreitzer	Gail	\$294.20	\$43.37	\$337.56	
233	3754	Dudek	Anthony	\$1,421.81	\$209.58	\$1,631.39	\$
234	3084	Duff	Tommy	\$215.34	\$31.74	\$247.09	
235	3916	Duna	Lawrence	\$760.98	\$112.17	\$873.15	
236	3617	Durey	Robert	\$795.00	\$117.19	\$912.19	\$
237	2006	Durtschi	Jeffrey	\$496.97	\$73.26	\$570.23	
238	100046	Dymond	Ernest	\$62.96	\$9.28	\$72.24	
239	3220	Dyson	Edward	\$237.76	\$35.05	\$272.81	
240	1095	Eckert	Michael	\$44.98	\$6.63	\$51.61	
241	3907	Eddik	Muhannad	\$31.60	\$4.66	\$36.26	
242	2637	Edwards	Jeffrey	\$2,251.54	\$331.89	\$2,583.42	\$
243	3381	Egan	Joseph	\$3,566.11	\$525.66	\$4,091.77	\$
244	3595	Ekoue	Ayi	\$2,813.75	\$414.76	\$3,228.50	\$
245	3125	Elam	Damon	\$2,368.35	\$349.10	\$2,717.46	\$
246	111822	Elgendy	Mohamed	\$96.88	\$14.28	\$111.17	
247	18678	Eliades	George	\$272.83	\$40.22	\$313.04	
248	3242	Eljawhary	Farid	\$233.11	\$34.36	\$267.47	
249	3771	Ellis	Charles	\$763.81	\$112.59	\$876.40	
250	109641	Emling	Paul	\$146.38	\$21.58	\$167.95	
251	106698	Emter	Christopher	\$124.52	\$18.36	\$142.88	
252	2975	English	David	\$419.94	\$61.90	\$481.84	
253	3567	Ernst	William	\$2,071.00	\$305.27	\$2,376.27	\$
254	3937	Esfarjany	Mahmood	\$61.93	\$9.13	\$71.06	
255	3689	Eshaghi	Mohammad	\$243.90	\$35.95	\$279.85	
256	2865	Esser	David	\$57.32	\$8.45	\$65.77	
257	3889	Estrada	Michael	\$217.71	\$32.09	\$249.80	

	A	B	C	D	E	F	G
258	3628	Evans	Steven	\$23.51	\$3.46	\$26.97	
259	3703	Fadlallah	Michel	\$675.34	\$99.55	\$774.88	
260	29981	Fair	Kirby	\$496.57	\$73.20	\$569.77	
261	3795	Farah	Yohannes	\$391.88	\$57.76	\$449.64	
262	2758	Feakes	Curtis	\$57.53	\$8.48	\$66.01	
263	2682	Fears	Thomas	\$4,474.10	\$659.50	\$5,133.60	\$
264	3591	Feleke	Melak	\$979.78	\$144.42	\$1,124.20	\$
265	3324	Ferrall	Edwin	\$240.80	\$35.49	\$276.29	
266	3549	Fesehazior	Teabe	\$2,143.08	\$315.90	\$2,458.98	\$
267	111068	Filatov	Andrey	\$20.19	\$2.98	\$23.16	
268	3877	Filfel	Kamal	\$3,138.25	\$462.59	\$3,600.84	\$
269	3528	Fitz-Patrick	Michael	\$150.98	\$22.26	\$173.24	
270	109381	Fitzsimmon	Marc	\$327.92	\$48.34	\$376.25	
271	111729	Flanders	Mary	\$208.19	\$30.69	\$238.88	
272	3705	Fleming	Gary	\$3,227.44	\$475.74	\$3,703.17	\$
273	2583	Foley	John	\$324.12	\$47.78	\$371.90	
274	3939	Ford	Todd	\$982.51	\$144.83	\$1,127.33	
275	3927	Fox	Gordon	\$258.33	\$38.08	\$296.41	
276	3860	Frankenbe	Grant	\$625.40	\$92.19	\$717.58	
277	2614	Franklin	David	\$530.60	\$78.21	\$608.81	
278	3196	Fredrickson	Steven	\$221.29	\$32.62	\$253.90	
279	3184	Friedman	Robert	\$384.78	\$56.72	\$441.50	
280	3774	Furst III	James	\$48.51	\$7.15	\$55.66	
281	107590	Galtieri	Frank	\$269.32	\$39.70	\$309.02	
282	2782	Garcia	John	\$10,117.38	\$1,491.34	\$11,608.72	\$1
283	3652	Garcia	Miguel	\$1,119.02	\$164.95	\$1,283.96	\$
284	3522	Gardea	Alfred	\$2,589.33	\$381.68	\$2,971.01	\$
285	3694	Gared	Yaekob	\$76.99	\$11.35	\$88.34	
286	3793	Garras	Bill	\$160.33	\$23.63	\$183.97	
287	26636	Garrett	Kathleen	\$20.07	\$2.96	\$23.03	
288	3642	Gaumond	Gerard	\$197.50	\$29.11	\$226.61	
289	3503	Gebrayes	Henock	\$582.20	\$85.82	\$668.02	
290	2870	Gebregiorg	Tewodros	\$57.35	\$8.45	\$65.81	

	A	B	C	D	E	F	G
291	3300	Gebrehan	Keber	\$1,330.65	\$196.14	\$1,526.79	\$
292	3801	Gebremari	Meley	\$200.99	\$29.63	\$230.61	
293	3580	Gebreyes	Fanuel	\$513.28	\$75.66	\$588.93	
294	3328	Gelane	Samuel	\$4,752.58	\$700.55	\$5,453.13	\$
295	3589	Gessese	Worku	\$81.57	\$12.02	\$93.59	
296	3153	Getnet	Girma	\$151.67	\$22.36	\$174.03	
297	3865	Ghori	Azhar	\$205.23	\$30.25	\$235.48	
298	3759	Gianopoul	Samuel	\$1,133.49	\$167.08	\$1,300.57	\$
299	3016	Giatropoul	John	\$68.57	\$10.11	\$78.68	
300	3696	Gillett	David	\$519.94	\$76.64	\$596.58	\$
301	3600	Gilmore	Paula	\$16.54	\$2.44	\$18.98	
302	3924	Gilo	Hobart	\$645.59	\$95.16	\$740.75	
303	31076	Glaser	Stephen	\$153.87	\$22.68	\$176.55	
304	3121	Gleason	John	\$4,310.08	\$635.32	\$4,945.41	\$
305	3540	Glogovac	Goran	\$1,243.82	\$183.34	\$1,427.16	\$
306	3762	Godsey	Kelly	\$1,233.95	\$181.89	\$1,415.83	\$
307	3739	Godsey	Thomas	\$90.55	\$13.35	\$103.89	
308	106897	Goettsche	Dale	\$31.60	\$4.66	\$36.26	
309	2064	Gohlke	James	\$381.88	\$56.29	\$438.17	
310	31840	Gokcek	Guney	\$99.83	\$14.72	\$114.55	
311	3688	Golden	Theresa	\$686.85	\$101.24	\$788.10	
312	3538	Goldman	Kevin	\$334.92	\$49.37	\$384.28	
313	3646	Golla	Dawit	\$72.45	\$10.68	\$83.12	
314	3848	Gomez-Go	Arlene	\$138.32	\$20.39	\$158.70	
315	3903	Gonzalez	Luis	\$1,355.04	\$199.74	\$1,554.78	\$
316	3586	Gonzalez	Ramon	\$503.17	\$74.17	\$577.33	
317	111390	Gonzalez	Pedro	\$263.79	\$38.88	\$302.67	
318	3929	Gonzalez-F	Jose	\$178.96	\$26.38	\$205.34	
319	3794	Goolsby	Victor	\$933.19	\$137.56	\$1,070.74	
320	3391	Grafton	Natasha	\$2,352.74	\$346.80	\$2,699.54	\$
321	3219	Gramatiko	Petko	\$88.94	\$13.11	\$102.05	
322	24757	Granchelle	Andrew	\$700.68	\$103.28	\$803.96	
323	19253	Gray	Gary	\$3,124.58	\$460.58	\$3,585.16	\$

	A	B	C	D	E	F	G
324	3197	Green	Tony	\$3,009.20	\$443.57	\$3,452.77	\$
325	2755	Greever	Rickey	\$3,835.37	\$565.35	\$4,400.72	\$
326	2843	Gregg	Gary	\$532.59	\$78.51	\$611.10	
327	2971	Gross	Timothy	\$1,831.66	\$269.99	\$2,101.65	\$
328	2868	Gross	Daniel	\$936.11	\$137.99	\$1,074.10	
329	3346	Gross	Mark	\$99.84	\$14.72	\$114.55	
330	2897	Gruttadauro	Martin	\$46.47	\$6.85	\$53.32	
331	18964	Guerrero	Daniel	\$1,211.23	\$178.54	\$1,389.76	\$
332	3655	Guinan	William	\$318.19	\$46.90	\$365.09	
333	2832	Guinto	Philip	\$285.36	\$42.06	\$327.43	
334	3296	Gutierrez	Jose	\$196.73	\$29.00	\$225.73	
335	2841	Gutierrez	Michael	\$69.27	\$10.21	\$79.48	
336	3895	Gyuro	John	\$343.12	\$50.58	\$393.70	
337	103550	Habte	Amanuel	\$1,165.61	\$171.82	\$1,337.43	\$
338	3636	Habtom	Ermias	\$663.42	\$97.79	\$761.21	
339	3799	Hadley	Aaron	\$221.75	\$32.69	\$254.44	
340	3827	Haigh III	Walter	\$202.61	\$29.87	\$232.48	
341	2619	Haley	Thomas	\$157.70	\$23.25	\$180.94	
342	111568	Hammoud	Wissam	\$618.64	\$91.19	\$709.83	
343	21446	Handlon	Michael	\$649.91	\$95.80	\$745.71	
344	2571	Hanley	David	\$188.29	\$27.75	\$216.04	
345	3734	Hanna	Christopher	\$353.39	\$52.09	\$405.48	
346	3402	Hansen	Jordan	\$1,997.58	\$294.45	\$2,292.03	\$
347	2695	Hansen	Diana	\$104.28	\$15.37	\$119.66	
348	29609	Haralamboc	Valko	\$260.48	\$38.40	\$298.88	
349	3519	Harms	Michael	\$1,568.25	\$231.17	\$1,799.42	\$
350	3761	Harrell	Mark	\$1,070.06	\$157.73	\$1,227.79	\$
351	3855	Harris	Dennis	\$2,455.84	\$362.00	\$2,817.84	\$
352	2564	Harris	Jay	\$1,894.66	\$279.28	\$2,173.95	\$
353	3811	Harris III	Reggie	\$19.13	\$2.82	\$21.95	
354	3941	Harrison	Andrew	\$297.76	\$43.89	\$341.65	
355	24039	Hart	Brandi	\$162.45	\$23.95	\$186.40	
356	3656	Harun	Idris	\$114.58	\$16.89	\$131.47	

	A	B	C	D	E	F	G
357	3515	Hasen	Akmel	\$483.59	\$71.28	\$554.87	
358	3742	Haskell	William	\$3,803.40	\$560.64	\$4,364.03	\$
359	2206	Hay	Mark	\$3,837.98	\$565.73	\$4,403.72	\$
360	3808	Hays	Larry	\$2,054.93	\$302.91	\$2,357.84	\$
361	109457	Hearne	Stephen	\$188.99	\$27.86	\$216.85	
362	110194	Henderson	Lloyd	\$467.13	\$68.86	\$535.98	
363	3933	Hendricks	Mark	\$352.95	\$52.03	\$404.97	
364	3634	Herbert	Christopher	\$1,177.50	\$173.57	\$1,351.06	\$
365	3763	Herga	Ryan	\$299.22	\$44.11	\$343.32	
366	3283	Hernandez	Luis	\$1,247.20	\$183.84	\$1,431.04	\$
367	3094	Hernandez	Norberto	\$608.82	\$89.74	\$698.56	
368	101555	Hernandez	Rene	\$272.18	\$40.12	\$312.30	
369	107072	Hernandez	Amilcar	\$219.91	\$32.42	\$252.33	
370	3100	Hilbert	Edward	\$1,307.11	\$192.67	\$1,499.78	\$
371	112038	Hill	Douglas	\$294.63	\$43.43	\$338.06	
372	2913	Hill	Fred	\$165.97	\$24.46	\$190.43	
373	109792	Hinds	Monroe	\$304.22	\$44.84	\$349.06	
374	2097	Hinks	Dana	\$970.54	\$143.06	\$1,113.61	\$
375	3765	Hirsi	Kamal	\$533.66	\$78.66	\$612.33	
376	2464	Hodge	Lee	\$1,173.17	\$172.93	\$1,346.10	\$
377	2490	Hoffman	Gery	\$30.38	\$4.48	\$34.86	
378	2017	Holcomb	Dalton	\$1,162.76	\$171.40	\$1,334.16	\$
379	3864	Holler	Alfonso	\$491.70	\$72.48	\$564.18	
380	3809	Hollis	James	\$92.91	\$13.70	\$106.61	
381	3509	Holloway	Maynard	\$94.89	\$13.99	\$108.88	
382	3822	Holt	John	\$2,920.16	\$430.44	\$3,350.60	\$
383	3653	Hooper	Donald	\$528.58	\$77.92	\$606.50	
384	3026	Hoopes	Bryant	\$110.98	\$16.36	\$127.33	
385	2022	Hopkins	Robert	\$191.91	\$28.29	\$220.20	
386	3607	Hoschouer	Christina	\$1,321.54	\$194.80	\$1,516.33	\$
387	109584	Hosley	Tracie	\$185.20	\$27.30	\$212.50	
388	2560	Houlihan	Beth	\$59.77	\$8.81	\$68.57	
389	2191	Howard	Robert	\$658.09	\$97.01	\$755.10	

	A	B	C	D	E	F	G
390	2863	Howard	Thomas	\$325.57	\$47.99	\$373.56	
391	31648	Hu	Karl	\$137.49	\$20.27	\$157.76	
392	3849	Huerena	Samuel	\$51.18	\$7.54	\$58.72	
393	2289	Huffman	Britton	\$1,911.79	\$281.81	\$2,193.60	\$
394	2400	Hughes	Jerry	\$2,720.00	\$400.94	\$3,120.94	\$
395	3780	Hunter	James	\$320.69	\$47.27	\$367.96	
396	3120	Huntington	Walter	\$1,078.23	\$158.94	\$1,237.17	\$
397	27788	Hurd	Donald	\$1,527.27	\$225.13	\$1,752.39	\$
398	3782	Hurley	Robert	\$246.55	\$36.34	\$282.89	
399	2751	Hurtado	Hubert	\$6,197.96	\$913.61	\$7,111.57	\$
400	3835	Hussien	Leykun	\$568.36	\$83.78	\$652.14	
401	3529	Hyman	Irving	\$56.35	\$8.31	\$64.65	
402	17189	Imran	Muhammad	\$104.12	\$15.35	\$119.46	
403	3187	Isaac	Edsel	\$263.62	\$38.86	\$302.48	
404	108273	Isanan	Claro	\$199.02	\$29.34	\$228.35	
405	107191	Ivanov	Yordan	\$74.55	\$10.99	\$85.54	
406	2114	Ivey	Timothy	\$1,046.55	\$154.27	\$1,200.82	\$
407	108839	Jackson	Frederick	\$2,776.86	\$409.32	\$3,186.18	\$
408	3701	Jackson	Willie	\$2,678.80	\$394.87	\$3,073.67	\$
409	3928	Jackson	Anthony	\$495.57	\$73.05	\$568.62	
410	107992	Jacobi	Donald	\$1,157.97	\$170.69	\$1,328.66	\$
411	20466	Jafarian	Moharram	\$13.55	\$2.00	\$15.55	
412	3020	Jarmosco	John	\$54.71	\$8.07	\$62.78	
413	2483	Javelona	Mario	\$3,199.71	\$471.65	\$3,671.36	\$
414	2412	Jelancic	Vladko	\$1,366.25	\$201.39	\$1,567.64	\$
415	3851	Jellison	Charles	\$327.35	\$48.25	\$375.60	
416	2083	Jennings	Stanley	\$331.46	\$48.86	\$380.32	
417	3315	Jimenez	Michael	\$3,308.60	\$487.70	\$3,796.31	\$
418	3109	Jin	Casey	\$2,255.12	\$332.41	\$2,587.54	\$
419	3151	Johnson	Kennard	\$1,657.18	\$244.28	\$1,901.46	\$
420	3602	Johnson	Tony	\$377.73	\$55.68	\$433.41	
421	3844	Johnson	Richard	\$162.40	\$23.94	\$186.34	
422	3898	Johnson	Cary	\$91.90	\$13.55	\$105.44	

	A	B	C	D	E	F	G
423	3539	Johnson	Brian	\$81.93	\$12.08	\$94.00	
424	2127	Johnson	Rodney	\$44.73	\$6.59	\$51.32	
425	2253	Jones	Glenn	\$3,712.11	\$547.18	\$4,259.29	\$
426	2639	Jones	James	\$247.93	\$36.55	\$284.48	
427	1058	Jones	Doug	\$223.09	\$32.88	\$255.98	
428	3784	Joseph	Leroy	\$2,440.47	\$359.74	\$2,800.21	\$
429	3239	Joseph	Loradel	\$172.42	\$25.41	\$197.83	
430	2849	Justice	Jason	\$479.91	\$70.74	\$550.65	
431	3919	Kabbaz	David	\$76.92	\$11.34	\$88.26	
432	111813	Kadir	Tura	\$23.88	\$3.52	\$27.39	
433	106642	Kadri	Abdelkrim	\$10.24	\$1.51	\$11.75	
434	3772	Kaiyooraw	Chaipan	\$3,065.66	\$451.89	\$3,517.55	\$
435	101942	Kalimba	Gaston	\$530.48	\$78.19	\$608.67	
436	29542	Kang	Chong	\$219.01	\$32.28	\$251.30	
437	3631	Karner	Adam	\$873.51	\$128.76	\$1,002.27	\$
438	3819	Keba	Woldmarim	\$569.14	\$83.89	\$653.03	
439	3303	Keber	Yilma	\$116.56	\$17.18	\$133.74	
440	2482	Keith	Marcus	\$190.51	\$28.08	\$218.60	
441	106153	Keller	Roger	\$390.90	\$57.62	\$448.52	
442	3531	Kelley	Jared	\$253.10	\$37.31	\$290.41	
443	2736	Kenary	Brian	\$3,450.45	\$508.61	\$3,959.06	\$
444	3484	Kern	Gary	\$9,231.17	\$1,360.71	\$10,591.89	\$1
445	3637	Key	Roy	\$174.71	\$25.75	\$200.46	
446	3651	Khan	Zaka	\$53.04	\$7.82	\$60.86	
447	105794	Kimler	Ryan	\$198.87	\$29.31	\$228.19	
448	3798	King Jr.	John	\$115.51	\$17.03	\$132.54	
449	2901	Kingsley	David	\$49.73	\$7.33	\$57.06	
450	111283	Kissel	Sean	\$51.23	\$7.55	\$58.78	
451	3893	Klein	Phillip	\$3,633.02	\$535.52	\$4,168.54	\$
452	3837	Knight	Tyree	\$262.37	\$38.67	\$301.04	
453	3215	Koch	Frederick	\$379.05	\$55.87	\$434.93	
454	3630	Kogan	Martin	\$6,773.74	\$998.48	\$7,772.22	\$
455	3273	Kolasienksi	Aemon	\$595.28	\$87.75	\$683.03	

	A	B	C	D	E	F	G
456	2789	Krouse	Stephen	\$906.46	\$133.62	\$1,040.07	\$
457	103826	Kull Jr.	William	\$135.94	\$20.04	\$155.98	
458	3662	Kunik	Robert	\$301.44	\$44.43	\$345.87	
459	3878	Laico	Paul	\$102.52	\$15.11	\$117.63	
460	111231	Lant	Mark	\$694.00	\$102.30	\$796.29	
461	3535	Lantis	Glen	\$1,045.93	\$154.17	\$1,200.10	\$
462	3435	Laspada	Brian	\$746.94	\$110.10	\$857.04	
463	25362	Lathan	Joseph	\$269.57	\$39.73	\$309.30	
464	111290	Lay	Gilbert	\$139.80	\$20.61	\$160.40	
465	3013	Lazarov	Vasilije	\$205.51	\$30.29	\$235.80	
466	1053	Leacock	Brian	\$1,191.71	\$175.66	\$1,367.37	\$
467	3685	Leal	Jill	\$2,181.82	\$321.61	\$2,503.43	\$
468	2635	Ledbetter	Ernest	\$11.17	\$1.65	\$12.81	
469	3702	Lee	Thomas	\$2,952.81	\$435.26	\$3,388.06	\$
470	18960	Lee	Melvin	\$469.33	\$69.18	\$538.51	
471	3159	Lefevre	Stephen	\$405.67	\$59.80	\$465.47	
472	3666	Legesse	Dereje	\$555.76	\$81.92	\$637.68	
473	2160	Leonardo	Vito	\$1,567.29	\$231.02	\$1,798.31	\$
474	3816	Ligus	Thomas	\$219.63	\$32.37	\$252.01	
475	25522	Link	Peter	\$1,068.46	\$157.50	\$1,225.96	\$
476	3681	Linzer	Steven	\$42.56	\$6.27	\$48.83	
477	15804	Little	Dennis	\$742.99	\$109.52	\$852.50	\$
478	3267	Liu	David	\$181.81	\$26.80	\$208.61	
479	3510	Lloyd	Mark	\$30.64	\$4.52	\$35.15	
480	3945	Lombana	Francisco	\$51.80	\$7.63	\$59.43	
481	3858	Lonbani	Khosro	\$607.51	\$89.55	\$697.06	
482	111405	Lopez-Silve	Fidel	\$81.02	\$11.94	\$92.96	
483	3752	Lorenz	Dierdra	\$866.03	\$127.66	\$993.69	
484	3813	Lovelady	Warren	\$11.90	\$1.75	\$13.65	
485	2963	Lovett	Patrick	\$598.72	\$88.25	\$686.98	
486	1065	Lovin	Charles	\$247.32	\$36.46	\$283.77	
487	3295	Lowe	John	\$767.67	\$113.16	\$880.82	
488	3006	Loyd	Gary	\$3,050.25	\$449.62	\$3,499.87	\$

	A	B	C	D	E	F	G
489	3326	Lucero	Arturo	\$1,825.80	\$269.13	\$2,094.93	\$
490	3339	Luo	Yue	\$490.93	\$72.36	\$563.29	
491	3778	Macato	Jaime	\$2,456.61	\$362.11	\$2,818.73	\$
492	20936	Madi	Adam	\$137.47	\$20.26	\$157.74	
493	24918	Magana	Luis	\$565.73	\$83.39	\$649.12	
494	3224	Magazin	Milorad	\$33.12	\$4.88	\$38.00	
495	107940	Maharit	Khamkhung	\$63.98	\$9.43	\$73.41	
496	2912	Mahmud	Omar	\$2,459.87	\$362.59	\$2,822.46	\$
497	2738	Mahoney	Kevin	\$638.30	\$94.09	\$732.39	
498	3096	Mainwarin	David	\$4,352.12	\$641.52	\$4,993.64	\$
499	2757	Majors	John	\$10,258.22	\$1,512.10	\$11,770.32	\$1
500	3312	Mandefro	Nebiyu	\$1,046.39	\$154.24	\$1,200.63	\$
501	22809	Manitien	Ted	\$13.83	\$2.04	\$15.87	
502	3890	Manor	Quincy	\$1,366.55	\$201.44	\$1,567.99	\$
503	3583	Maras	Maria	\$2,195.44	\$323.62	\$2,519.05	\$
504	110053	Martinez	Francisco	\$1,713.26	\$252.54	\$1,965.80	\$
505	106666	Martinez	Arturo	\$63.48	\$9.36	\$72.83	
506	3866	Martinez-F	Eduardo	\$757.35	\$111.64	\$868.98	\$
507	100287	Martins	Julio	\$298.27	\$43.97	\$342.24	
508	1033	Masetta	Ronald	\$593.06	\$87.42	\$680.48	
509	3088	Massey	Michael	\$752.45	\$110.91	\$863.36	
510	3325	Mastilovic	Branislav	\$296.04	\$43.64	\$339.68	
511	3698	Mastrio	Angelo	\$287.39	\$42.36	\$329.75	
512	110618	Mastrio	Pamela	\$234.23	\$34.53	\$268.76	
513	110108	Mathis	George	\$297.42	\$43.84	\$341.26	
514	3669	Maza	Inez	\$349.93	\$51.58	\$401.51	
515	111284	McCall	Melvin	\$169.85	\$25.04	\$194.88	
516	111199	McCarroll-	Claudia	\$17.52	\$2.58	\$20.11	
517	2587	McCarter	Patrick	\$3,774.48	\$556.37	\$4,330.85	\$
518	3690	McCarthy	John	\$3,474.77	\$512.20	\$3,986.97	\$
519	3654	McConnell	Therral	\$873.55	\$128.77	\$1,002.32	
520	3743	McCoubre	Earl	\$1,347.94	\$198.69	\$1,546.63	\$
521	107427	McDougle	Jeffrey	\$124.87	\$18.41	\$143.27	