

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

IN RE: D.O.T. LITIGATION

TGIG, LLC; NEVADA HOLISTIC MEDICINE, LLC; GBS NEVADA PARTNERS, LLC; FIDELIS HOLDINGS, LLC; GRAVITAS NEVADA, LLC; NEVADA PURE, LLC; MEDIFARM, LLC; AND MEDIFARM IV LLC,  
Appellants/Cross-Respondents,

vs.

DEEP ROOTS MEDICAL, LLC;  
Respondent/Cross-Appellant,

and,

THE STATE OF NEVADA DEPARTMENT OF TAXATION; CANNABIS COMPLIANCE BOARD; AND INTEGRAL ASSOCIATES LLC; D/B/A ESSENCE CANNABIS DISPENSARIES, ESSENCE TROPICANA LLC, ESSENCE HENDERSON, LLC,  
Respondents.

Electronically Filed  
Case No. ~~MA2023-0004~~ 86275-2023 03:06 PM  
District Court Case No. A787004  
Elizabeth A. Brown  
Clerk of Supreme Court

**RESPONDENT/CROSS-APPELLANT DEEP ROOTS HARVEST, INC.'S  
RESPONSE TO NOTICE OF MODIFICATION OF CAPTION**

Respondent/Cross-Appellant Deep Roots Harvest, Inc. hereby responds to the Notice of Modification of Caption filed on March 23, 2023. Respondent/Cross-Appellant believes that the caption is incorrect insofar as it references Deep Roots Medical, LLC as a party. Respondent/Cross-Appellant was originally formed as a limited-liability company with the name Deep Roots Medical, LLC. In 2021, however, Respondent/Cross-Appellant filed articles of conversion and became a corporation with the name Deep Roots Harvest, Inc. On October 19, 2021, consistent with NRCP 17, Respondent/Cross-Appellant filed a Notice of Name Change with the district court, a copy of which is attached to this

response for reference. Thus, Respondent/Cross-Appellant believes that the caption in this matter should now appropriately read:

IN RE: D.O.T. LITIGATION

TGIG, LLC; NEVADA HOLISTIC MEDICINE, LLC; GBS NEVADA PARTNERS, LLC; FIDELIS HOLDINGS, LLC; GRAVITAS NEVADA, LLC; NEVADA PURE, LLC; MEDIFARM, LLC; AND MEDIFARM IV LLC,  
Appellants/Cross-Respondents,

vs.

DEEP ROOTS HARVEST, INC.;  
Respondent/Cross-Appellant,

and,

THE STATE OF NEVADA DEPARTMENT OF TAXATION; CANNABIS COMPLIANCE BOARD; AND INTEGRAL ASSOCIATES LLC; D/B/A ESSENCE CANNABIS DISPENSARIES, ESSENCE TROPICANA LLC, ESSENCE HENDERSON, LLC,  
Respondents.

**Case No. 86275**  
District Court Case No. A787004

Regardless of the caption, however, Respondent/Cross-Appellant also offers this response to clarify any confusion over its prior conversion and name change.

DATED this 27<sup>th</sup> day of March, 2023.

ROBERTSON, JOHNSON,  
MILLER & WILLIAMSON  
50 West Liberty Street, Suite 600  
Reno, Nevada 89501

By: /s/ Richard D. Williamson

Richard D. Williamson, Esq.

Anthony G. Arger, Esq.

Briana N. Collings, Esq.

*Attorneys for Respondent/*

*Cross-Appellant*

*Deep Roots Harvest, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Robertson, Johnson, Miller & Williamson, over the age of 18, and not a party within this action.

I further certify that on the 27<sup>th</sup> day of March, 2023, I electronically filed the foregoing **RESPONDENT/CROSS-APPELLANT DEEP ROOTS HARVEST, INC.'S RESPONSE TO NOTICE OF MODIFICATION OF CAPTION** with the Clerk of the Court by using the electronic filing system, which served the same on all parties listed on the court's master service list.

Eleissa C. Lavelle  
JAMS  
7160 Rafael Rivera Way, Suite 400  
Las Vegas, NV 89113  
Telephone: (702) 457-5267  
*Settlement Judge*

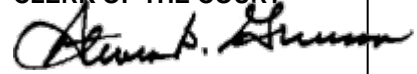
/s/ Stefanie Martinez  
An Employee of Robertson, Johnson, Miller & Williamson

## **Index of Exhibits**

<b><u>Exhibit</u></b>	<b><u>Description</u></b>	<b><u>Pages</u></b>
1	Notice of Name Change	2

EXHIBIT “1”

EXHIBIT “1”



**NOTC**  
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State Bar No. 9932  
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State Bar No. 11874  
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*Attorneys for Deep Roots Harvest, Inc.*

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

IN RE: DOT

Case No.: A-19-787004-B  
Department: 31

CONSOLIDATED WITH:  
A-19-787035-C; A-18-785818-W  
A-18-786357-W; A-19-786962-B  
A-19-787540-W; A-19-787726-C  
A-19-801416-B

**NOTICE OF NAME CHANGE**

Defendant DEEP ROOTS HARVEST, INC. ("Deep Roots"), by and through its undersigned counsel of record, the law firm of Robertson, Johnson, Miller & Williamson, hereby notifies the Court and all parties herein that its name was changed from DEEP ROOTS MEDICAL, LLC to DEEP ROOTS HARVEST, INC. doing business as Deep Roots Harvest.

**AFFIRMATION:** Pursuant to NRS § 239B.030, the undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

DATED this 19<sup>th</sup> day of October, 2021.

ROBERTSON, JOHNSON,  
MILLER & WILLIAMSON

By: /s/ Richard D. Williamson  
Richard D. Williamson, Esq.  
*Attorneys for Deep Roots Harvest, Inc.*

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I hereby certify that I am an employee of Robertson, Johnson,  
3 Miller & Williamson, 50 West Liberty Street, Suite 600, Reno, Nevada 89501, over the age of  
4 eighteen, and not a party within this action. I further certify that I e-filed and served the  
5 foregoing **NOTICE OF NAME CHANGE** to all parties listed on the Court's Master Service  
6 List via the Clerk of the Court by using the electronic filing system on the 19<sup>th</sup> day of October,  
7 2021.

8 DATED this 19<sup>th</sup> day of October, 2021.

9 /s/ Stefanie E. Smith

10 An Employee of Robertson, Johnson, Miller & Williamson  
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