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IN THE MATTER OF THE APPLICATION OF DESERT CAB CO. TO ADJUST TAXICAB CHARGES TO INCLUDE A PASS-THROUGH Date of Hearing: TBA Time of Hearing: TBA

KAPTYN TECHNOLOGY, INC'S PETITION TO INTERVENE

COME NOW KAPTYN TECHNOLOGY, INC. ("Petitioner" or "Kaptyn") hereby petitions the Nevada State Taxicab Authority ("Authority") to intervene in the above referenced matter.

This Petition is pursuant to NRS 706.881 et seq. and is supported by the following:

- 1. Petitioner is a corporation organized and existing under the laws of the State of Nevada with its principal place of business located at 4675 Wynn Road, Las Vegas, Nevada 89103.
 - 2. Written communications concerning this case should be addressed to:

KAPTYN TECHNOLOGY, INC. Attention: Andrew Meyers, CEO 4675 Wynn Road Las Vegas, Nevada 89103 andrew@kaptyn.com

- 3. Petitioner is a provider to common motor carriers holding Certificates of Public Convenience and Necessity issued by this Authority of technology, systems, software, hardware, methods, and tools that enable such common motor carriers to satisfy certain of this Authority's requirements for Las Vegas, Nevada taxicabs to be equipped with certain technology and systems.
- 4. Petitioner is a leading provider of customized fleet manager software to for-hire vehicle fleets, and taxicab fleets in particular. Among other functionalities, Kaptyn's SaaS provides universal and automated dispatch, data and fleet management systems through its Fleet Smart Distribution platform and Integrated Taxi Meter & Data Terminal. The software can be used to generate trip details, provide and securely transmit accurate meter readings and meter state changes, track utilization and forecast demand, increase fuel efficiency, schedule and verify periodic maintenance and provide automated logistics. The software also generates a variety of important reports for fleet owners covering information such as driver productivity, daily cash flow and regulatory reporting information.

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- 5. Petitioner has licensed its software systems to Joint Applicants Desert Cab Co. and A-Cab Co. as well as to the following other taxicab companies operating in Clark County: Yellow Cab, Checker Cab Co., Star Cab, New Cab, Deluxe Cab Co., Henderson Taxi, Whittlesea Blue Cab Co., Lucky Cab Co., Nellis Cab Co. and Western Cab Co.
- 6. Petitioner has entered into a conditional license agreement with IVSC IP, LLC ("IVSC"), the owner of five (5) issued patents and six (6) pending patent applications that IVSC contends are implicated by Kaptyn's software products and the use of those software products by taxicab fleets in Clark County. That license agreement is conditioned on the approval of the pass-through software license charge in the above-captioned processing.
- 7. Petitioner therefore has a direct and substantial interest in the subject matter of this proceeding under NAC §706.894.
- 8. Petitioner supports the Amended Application of Desert Cab Co. to adjust taxicab charges to include a pass-through software license charge of \$.50 per ride on the grounds that the Kaptyn software delivers significant benefits to fleet owners in efficiency, time and cost savings (and avoiding other rate increases based on fleet management expenses) to owners. The Kaptyn software also provides significant benefits to taxicab riders in improved quality and time of rides and increased safety of riders, at reasonable fares. The rate increase requested in the Amended Application is in the public interest.
- 9. Petitioner's attorney, Robert Yorio, Esq., Pro Hac Vice application is currently pending as Attorney Yorio is awaiting his Certificate of Good Standing from the State Bar of California.
- 10. Petitioner therefore requests that it be permitted to intervene and join in this proceeding and that it be served with copies of any and all pleadings, notices, papers and exhibits that have been or may be filed in this matter.

WHEREFORE, Petitioner respectfully requests that this Authority enter an appropriate order that:

- 1. Grants permission to the Petitioner to intervene and participate fully in any public hearing with respect to this matter, including the right to offer evidence of any kind, to examine and cross-examine witnesses, and to make arguments and file briefs, as well as participate in all other aspects of this matter; and
 - 2. For such other relief as appears just and proper.

DATED this 24th day of March, 2025.

KAPTYN TECHNOLOGY, INC.

Docusigned by: Andrew Meyers

Andrew Meyers, CEO 4675 Wynn Road Las Vegas, NV 89103 Telephone: (702) 462-2182 Email: andrew@kaptyn.com

BROWN BROWN & PREMSRIRUT

/s/ Puoy K. Premsrirut

Puoy Premsrirut, Esq. Nevada Bar No. 7141 520 S. 4th St. Las Vegas, Nevada 89101 (702) 598-1484 puoy@brownlawlv.com

Pro Hac Vice Sponsoring Attorney

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of March, 2025, I served via electronic mail, a true and accurate copy of the foregoing to the following persons:

3	accurate copy of the foregoing to the for
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5	Mark Trafton, Esq. Whittlesea/Henderson
6	1900 Industrial Road Las Vegas, NV 89102
7	Fax: 382-4604 mark@belltransportation.com
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9	Brent Bell Whittlesea Bell
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12	George Balaban
13	Desert Cab Co. 4675 S. Wynn Road
14	Las Vegas, NV 89103 Fax: 386-6859
15	gtbalaban@aol.com
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17	Las Vegas, NV 89109 Fax: 477-7626
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19	Robert Winner, Esq. WINNER & CARSON, P.C.
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By: /s/ Kami C. Vermillion
An Employee of Brown Brown & Premsrirut