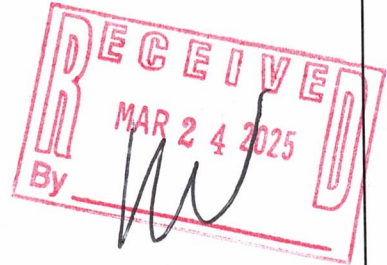


BEFORE THE NEVADA TAXICAB AUTHORITY

Re: Amended Application of Desert Cab Company to Adjust Taxicab Charges to Include a Fifty Cent (\$0.50) Per Taxi Ride Pass-Through Software License Charge incurred as the result of a negotiated license agreement by KAPTYN with the third-party patent owner. KAPTYN, is one of the Software-As-A-Service taxi dispatch and data system providers who license these types of systems, devices and methods to the taxicab industry in Clark County, Nevada

Date of Hearing:

Time of Hearing:



NEVADA YELLOW, CHECKER, STAR CORPORATIONS, NEWCAB, AND TAXI MANAGEMENT, LLC'S AMENDED PETITION FOR LEAVE TO INTERVENE

COME NOW, Nevada Yellow, Checker, Star Corporations, NewCab, and Taxi Management, LLC (hereinafter, "Petitioners"), by and through their undersigned representative, and hereby petition the Nevada State Taxicab Authority ("Authority") for leave to intervene in the above-captioned matter pursuant to NAC 706.894 and NRS 706.881 et seq. In support thereof, Petitioners state as follows:

I. INTEREST OF PETITIONERS

1. Petitioners are corporations and limited liability companies duly organized and existing under the laws of the State of Nevada, with their principal place of business located at 5225 W. Post Road, Las Vegas, Nevada.
2. Written communications regarding this Petition should be addressed to:

NEVADA YELLOW, CHECKER, STAR CORPORATIONS, NEWCAB, AND TAXI MANAGEMENT, LLC
ATTN: Michael Bailin, General Manager
5225 W. Post Road
Las Vegas, NV 89118
mbailin@taximanagement.vegas
legal@taximanagement.vegas

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II. BASIS FOR INTERVENTION

3. Petitioners are common motor carriers operating under Certificates of Public Convenience and Necessity issued by the Authority and are authorized to provide taxicab service within Clark County, Nevada.
4. As holders of duly issued taxicab medallions, Petitioners are directly and substantially affected by the proposed Amended Application of Desert Cab Company to adjust taxicab charges to include a Fifty Cent (\$0.50) Per Taxi Ride Pass-Through Software License Charge.
5. Pursuant to NAC 706.894(1), Petitioners have a substantial interest in this proceeding, as the proposed surcharge would directly impact their passengers and the competitive landscape of taxicab services in Clark County.
6. The requested surcharge is not in the public interest and, if approved, would impose unnecessary financial burdens on riders, contrary to the principles of fairness and reasonable fare-setting.
7. Pursuant to NAC 706.894(3), Petitioners' intervention will not unduly broaden the issues in this proceeding but will instead contribute to a full and fair evaluation of the matter before the Authority.
8. Petitioners wish to reserve the right to present economic analysis, industry data, and expert testimony to demonstrate that the proposed \$0.50 per-ride surcharge is not in the public interest, would create an unfair financial burden on passengers, and lacks justification under existing regulatory standards. Petitioners may also

1 provide comparative market analysis and operational impact assessments to support their
2 position.

- 3 9. Additionally, Petitioners may wish to present evidence challenging the validity and
4 enforceability of the patents that serve as the basis for the proposed surcharge. The
5 imposition of ongoing fees related to these patents is not justified, as patents are not
6 intended to create perpetual revenue streams at the expense of the public. Petitioners will
7 argue that the proposed charge constitutes an anti-competitive and unreasonable financial
8 burden that is not aligned with the principles of fair and transparent fare-setting.
9


10 III. REQUEST FOR RELIEF

11 WHEREFORE, Petitioners respectfully request that the Nevada State Taxicab Authority:
12

- 13 1. Grant this Amended Petition for Leave to Intervene in the above-referenced proceeding;
14 2. Permit Petitioners to participate fully in the hearing, including presenting evidence and
15 argument;
16 3. Serve Petitioners with copies of all pleadings, notices, filings, and exhibits related to this
17 matter; and
18 4. Provide any such relief that the Authority deems just and proper.
19

20 Dated this 24th day of March, 2025.
21

22 NEVADA YELLOW, CHECKER, STAR
23 CORPORATIONS, NEWCAB, AND TAXI
24 MANAGEMENT, LLC

25 By: 
26 Michael Bailin, General Manager
27 5225 W. Post Road
28 Las Vegas, Nevada 89118
mbailin@taximanagement.vegas
legal@taximanagement.vegas

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3 **CERTIFICATE OF SERVICE**

4 I hereby certify that on the 24th day of March, 2025, I served via electronic mail, a true
5
6 and accurate copy of the foregoing to the following persons:

7 Mark Trafton, Esq.
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9 1900 Industrial Road
10 Las Vegas, NV 89102
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12 mark@belltransportation.com

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13 4675 S. Wynn Road
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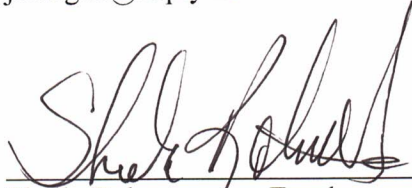
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Sheila Robertson, an Employee

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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of March, 2025, I mailed, a true and accurate filed-stamped copy of the Nevada Yellow, Checker, Star Corporations, NewCab and Taxi Management, LLC's Amended Petition for Leave to Intervene to the following persons:

Puoy Preamsrit, Esq.
Brown Brown & Preamsrit
520 S. 4th Street, 2nd Floor
Las Vegas, NV 89101


Sheila Robertson
An Employee