

1 **BEFORE THE NEVADA TAXICAB AUTHORITY**

2
3 In Re: Application by Peteglo, LLC- TPM, LLC:)
4 George Balaban (AGTB LLC) Manager/Member of)
5 Peteglo, LLC and Brad Balaban (BJ) and Dana)
6 Balaban, Both Members of Peteglo LLC-TPM, LLC,)
7 to Acquire Certificate of Public Convenience and)
Necessity CPC-T 884-4 issued to Nellis Cab, a)
Nevada Series LLC.)
_____)

8
9 **ANSWER TO PETITION FOR LEAVE TO INTERVENE**

10 COMES NOW, Peteglo, LLC-TPM, LLC (hereinafter referred to as "Applicant-Buyer") by
11 and through counsel of record, Kimberly Maxson-Rushton, Esq., of the law firm, Cooper Levenson,
12 P.A., and hereby submits the following Answer to the Petition for Leave to Intervene filed by
13 Petitioner's Julie and Lisa Chenoweth (hereinafter referred to as "Petitioners").

14 This Response is based on the authority set forth in Nevada Administrative Code ("NAC")
15 706.894 (Petitions for Leave to Intervene.) and, by reference, NAC 706.39655 (Pleadings: Response
16 to petition to intervene.)

17 All notices, pleading documents and correspondence pertaining to this proceeding should be
18 directed to the following individual:

19 Kimberly Maxson-Rushton, Esq.
20 Cooper Levenson, Attorneys at Law
21 3016 W. Charleston Blvd., Ste. 195
22 Las Vegas, Nevada 89102
krushton@cooperlevenson.com

23 **I.**

24 **MEMORANDUM OF POINTS AND AUTHORITIES**

25 **A. Procedural History**

26 On November 7, 2025, Peteglo, LLC-TPM, LLC., Applicant-Buyer, filed an application with
27 the Nevada Taxicab Authority ("TA") to acquire Certificate of Public Convenience and Necessity
28 ("CPCT") 884 Sub 4. The Sale and Transfer Application (hereinafter referred to as "Application")

1 was noticed to the public on November 20, 2025, and on December 2, 2025, Petitioners filed the
2 subject Petition for Leave to Intervene (“PLTI”).

3 On January 31, 2025, Petitioners filed a Complaint in the Eighth Judicial District Court
4 against Sun Cab, Inc. asserting their right to examine the corporate books and financial records of
5 Sun Cab, Inc. and alleging a breach of contract, a breach of the implied covenant of good faith and
6 fair dealing, and a breach of fiduciary duties by officer / director Michelle Langille. In doing so,
7 Petitioners sought, amongst other things, the appointment of a receiver over Sun Cab, Inc. and a
8 temporary restraining order (“TRO”). See, Exhibit A to Petitioners PLTI. On or about November 6,
9 2025, the Honorable District Court Judge Mark Denton approved the TRO and specifically stated
10 that it [the TRO] did not preclude Nellis / Michelle Langille from seeking approval from the TA to
11 sale and transfer the CPCT. See, Exhibit C to Petitioners PLTI.

12 On December 5, 2025, Applicant-Seller, Nellis Cab, filed for Chapter 11 bankruptcy in the
13 United States Bankruptcy Court, District of Nevada, thereby, staying the District Court matter. See,
14 Applicant Buyers, Ex. 1 – December 5, 2025, Nellis Cab Bankruptcy Filing.

15 The Application is scheduled for consideration by the TA Board on December 17, 2025.

16 B. Legal Argument

17 Pursuant to NAC 706.894, an individual directly and substantially affected by a proceeding
18 before the TA may seek authority to intervene. Specifically, through the filing of a PLTI, a petitioner
19 that shows a direct and substantial interest in the matter and whose participation will not unduly
20 broaden the issues may be granted leave to intervene or authority to appear in the proceeding limited
21 to the matters noticed in the PLTI. However, if the public interest does not require the participation
22 of an intervenor, the PLTI should be dismissed.

23 In this instance, Petitioner’s assert a direct and substantial interest in this matter based on the
24 alleged failure of the majority owner of Nellis Cab to provide access to the financial and corporate
25 records of Sun Cab, Inc. and Ms. Langille’s breach of her fiduciary duties to Sun Cab. Without
26 question, matters such as this fall outside the TA’s jurisdiction in that the TA cannot provide the
27 minority owners of Sun Cab, Inc. with the relief sought in the Complaint. This was very clear to the
28

1 District Court as the TRO does not prevent the Applicant Parties from proceeding with seeking
2 approval of the Application.

3 However, considering the recent bankruptcy filing, the District Court proceeding is stayed,
4 thereby providing Petitioner's with no basis upon which to assert a direct and substantial interest in
5 this Application.

6 More specific to the latter point, pursuant to the bankruptcy filing, Nellis Cab has one-
7 hundred and twenty (120) days in which to submit a plan of reorganization. Clearly, the plan
8 contemplates Applicant-Buyer being authorized by the bankruptcy trustee to acquire the assets of
9 Nellis Cab, which includes the CPCT and the corresponding medallions. As evidenced by Nevada
10 Revised Statute ("NRS") 706.8819(1)(b) the TA maintains *exclusive authority* to issue a CPCT to
11 operate a taxicab business in Clark County, Nevada. Therefore, if the subject Application is
12 approved and Applicant-Buyer is found suitable by the TA to acquire and operate Nellis Cab, the
13 bankruptcy trustee may proceed with approval of the plan and effectuate the transfer of operations.

14 Applicant-Buyer respectfully submits that it is in the public interest for the TA to proceed
15 with consideration of this Application, *without assistance or input from Petitioners*, and allow the
16 plan of reorganization to be approved by the bankruptcy trustee. A speedy approval of the plan of
17 reorganization will assist Nellis in its efforts to maintain its current taxi operations and it helps Nellis
18 meet its financial obligations. Thus, the TA's consideration of this Application is time sensitive and
19 necessary.

20 Applicant-Buyer further submits that the PLTI should be dismissed based on Petitioner's
21 lack of a direct and substantial interest in any material aspect of the Application. More specifically,
22 Petitioners fail to cite to any element of NRS 706.8827 that Applicant-Buyer cannot meet; nor, can
23 Petitioners demonstrate any infirmities with the Application as presented. Therefore, to allow
24 Petitioner to intervene will serve no purpose other than to unduly broaden the issues and
25 unnecessarily delay consideration of the Application.

1 II.

2 CONCLUSION

3 Based on the arguments set forth herein, Applicant-Buyer respectfully submits that the PLTI
4 should be dismissed as Petitioner cannot demonstrate a direct and substantial interest in the
5 Application and the public interest does not require Petitioner's participation in this matter.

6 DATED this 15th day of December 2025.

7 COOPER LEVENSON, P.A.

8 /s/Kimberly Maxson-Rushton

9 Kimberly Maxson-Rushton, Esq.
10 Nevada Bar No. 5065
11 3016 W. Charleston Boulevard, #195
12 Las Vegas, NV 89102
13 *Counsel for Peteglo, LLC- TPM, LLC*
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of December 2025, I did deposit for mailing in the United States mail at Las Vegas, Nevada, a true and correct copy of the above and foregoing **ANSWER TO PETITION FOR LEAVE TO INTERVENE** in a sealed envelope with first class postage fully prepaid thereon, addressed to:

Brian R. Hardy, Esq.
10001 Park Run Drive
Las Vegas, Nevada 89145

Sarah C. Ethington, Esq.
10001 Park Run Drive
Las Vegas, Nevada 89145

Hannah D. Gagow, Esq.
10001 Park Run Drive
Las Vegas, Nevada 89145

Office of the Attorney General
1 State of Nevada Way Suite 100
Las Vegas, NV 89119

Krisanne Cunnigham, Esq.
3800 Howard Hughes Parkway, Suite 1200
Las Vegas, NV 8916

Samuel Schwartz, Esq.
601 E Bridger Rd
Las Vegas, Nevada 89101

By /s/Amy Ingolia
An Employee of
COOPER LEVENSON, P.A.

EXHIBIT 1

Fill in this information to identify the case:

United States Bankruptcy Court for the:

DISTRICT OF NEVADA

Case number (if known) _____ Chapter 11☐ Check if this is an amended filing**Official Form 201****Voluntary Petition for Non-Individuals Filing for Bankruptcy**

04/25

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name	<u>Nellis Cab, LLC</u>	
<hr/>		
2. All other names debtor used in the last 8 years Include any assumed names, trade names and doing business as names		
<hr/>		
3. Debtor's federal Employer Identification Number (EIN)	<u>46-3626159</u>	
<hr/>		
4. Debtor's address	Principal place of business	Mailing address, if different from principal place of business
	<u>Nellis Cab, LLC</u>	
	<u>9811 W. Charleston Blvd., #2-367</u>	
	<u>Las Vegas, NV 89117</u>	
	Number, Street, City, State & ZIP Code	<u>_____</u>
	<u>Clark</u>	P.O. Box, Number, Street, City, State & ZIP Code
	County	
		Location of principal assets, if different from principal place of business
		<u>4195 W Diablo Dr. Las Vegas, NV 89118</u>
		Number, Street, City, State & ZIP Code
<hr/>		
5. Debtor's website (URL)	<u>nelliscab.llc</u>	
<hr/>		
6. Type of debtor	<input checked="" type="checkbox"/> Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP)) <input type="checkbox"/> Partnership (excluding LLP) <input type="checkbox"/> Other. Specify: _____	
<hr/>		

Debtor Nellis Cab, LLC
Name

Case number (if known) _____

7. Describe debtor's business A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
- ☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- ☐ Railroad (as defined in 11 U.S.C. § 101(44))
- ☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
- ☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
- ☒ None of the above

B. Check all that apply

- ☐ Tax-exempt entity (as described in 26 U.S.C. § 501)
- ☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)
- ☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
- ☐ Chapter 9
- ☒ Chapter 11. Check all that apply:

- ☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,424,000 (amount subject to adjustment on 4/01/28 and every 3 years after that).
- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and it chooses to proceed under Subchapter V of Chapter 11.
- ☐ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**

- ☒ No.
- ☐ Yes.

If more than 2 cases, attach a separate list.

District _____	When _____	Case number _____
District _____	When _____	Case number _____

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

- ☒ No
- ☐ Yes.

List all cases. If more than 1, attach a separate list

Debtor _____	Relationship _____
District _____	Case number, if known _____

Debtor Nellis Cab, LLC
Name

Case number (if known) _____

11. Why is the case filed in this district?

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?☒ No☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.**Why does the property need immediate attention? (Check all that apply.)**☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard? _____

☐ It needs to be physically secured or protected from the weather.☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).☐ Other _____**Where is the property?** _____

Number, Street, City, State & ZIP Code

Is the property insured?☐ No☐ Yes. Insurance agency _____

Contact name _____

Phone _____

Statistical and administrative information**13. Debtor's estimation of available funds**

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available to unsecured creditors.

14. Estimated number of creditors☒ 1-49☐ 50-99☐ 100-199☐ 200-999☐ 1,000-5,000☐ 5001-10,000☐ 10,001-25,000☐ 25,001-50,000☐ 50,001-100,000☐ More than 100,000**15. Estimated Assets**☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☒ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion**16. Estimated liabilities**☐ \$0 - \$50,000☐ \$50,001 - \$100,000☒ \$100,001 - \$500,000☐ \$500,001 - \$1 million☐ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion

Debtor Nellis Cab, LLC
Name

Case number (if known) _____

Request for Relief, Declaration, and Signatures**WARNING** -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**17. Declaration and signature
of authorized
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 5, 2025
MM / DD / YYYY**X** /s/ Michelle Langille
Signature of authorized representative of debtorMichelle Langille
Printed nameTitle Manager**18. Signature of attorney****X** /s/ Samuel A Schwartz
Signature of attorney for debtorDate December 5, 2025
MM / DD / YYYYSamuel A Schwartz 10985
Printed nameSchwartz
Firm name601 E Bridger Ave
Las Vegas, NV 89101
Number, Street, City, State & ZIP CodeContact phone (702) 385-5544Email address ecf@nvfirm.com10985 NV
Bar number and State

Fill in this information to identify the case:Debtor name Nellis Cab, LLCUnited States Bankruptcy Court for the: DISTRICT OF NEVADA

Case number (if known) _____

☐ Check if this is an amended filing**Official Form 202****Declaration Under Penalty of Perjury for Non-Individual Debtors**

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Declaration and signature

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets—Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ *Amended Schedule* _____
- ☒ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☐ Other document that requires a declaration _____

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 5, 2025**X /s/ Michelle Langille**

Signature of individual signing on behalf of debtor

Michelle Langille

Printed name

Manager

Position or relationship to debtor

Fill in this information to identify the case:

Debtor name Nellis Cab, LLC
 United States Bankruptcy Court for the: DISTRICT OF NEVADA
 Case number (if known): _____

☐ Check if this is an
 amended filing

Official Form 204
Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders
12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Aflac Group Insurance PO Box 84069 Columbus, GA 31908		Goods & Services				\$1,100.97
AGR Windshields, LLC 5330 Cameron St, #27 Las Vegas, NV 89118		Goods & Services				\$1,375.28
Anthony's Towing 5375 S. Cameron St, #A1 Las Vegas, NV 89118		Goods & Services				\$800.00
Bank of America PO Box 660441 Dallas, TX 75266-0441		Credit card purchases				\$17,137.47
California State Disbursement Unit PO Box 989067 West Sacramento, CA 95798						\$715.38
City Express #8 - Trop Stop 4885 W Tropicana Ave. Las Vegas, NV 89103		Goods & Services				\$4,373.62
Clark County Department of Aviation 5757 Wayne Newton Blvd. Las Vegas, NV 89119						\$34,591.20
Florida State Disbursement Unit P.O. Box 8500 Tallahassee, FL 32314-8500						\$509.16

Debtor Nellis Cab, LLC
Name

Case number (if known) _____

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Health Plan of Nevada 2720 N Tenaya Way Las Vegas, NV 89128		Insurance				\$37,563.44
Hostmeister.com, LLC PO Box, Las Vegas Las Vegas, NV 89178		Goods & Services				\$2,157.00
Humana Insurance Co. 101 E. Main St. Louisville, KY 40202		Insurance				\$3,350.19
Kaptyn, Inc. 675 S Wynn Rd. Las Vegas, NV 89103		Goods & Services				\$1,030.95
Loomis 3370 Palm Pkwy Las Vegas, NV 89104		Goods & Services				\$463.32
Nevada Department of Taxation 700 East Warm Springs Road, 2nd Floor Las Vegas, NV 89119		Business Tax				\$46,067.21
Nevada Employment Security Division Contributions Section, 500 East Third St Carson City, NV 89713						\$6,121.59
Nevada Taxi Cab Authority 2090 E Flamingo Rd, Ste 200 Las Vegas, NV 89119						\$14,806.00
RJR Insurance Company, Inc. 10050 Crosstown Cir, Ste 105 Eden Prairie, MN 55344		Insurance				\$30,000.00
Silver Lake Auto Body 4405 E Colton Ave #106 Las Vegas, NV 89115		Goods & Services				\$15,291.30
Southstate Bank of Florida 1101 First Street South Winter Haven, FL 33880						\$250,000.00

Debtor Nellis Cab, LLC
Name

Case number (if known) _____

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Two-Way Communications 4674 S Valley View Blvd. Las Vegas, NV 89103		Goods & Services				\$640.00

**United States Bankruptcy Court
District of Nevada**

In re Nellis Cab, LLC

Debtor(s)

Case No.
Chapter

11

VERIFICATION OF CREDITOR MATRIX

I, the Manager of the corporation named as the debtor in this case, hereby verify that the attached list of creditors is true and correct to the best of my knowledge.

Date: December 5, 2025

/s/ Michelle Langille

Michelle Langille/Manager
Signer/Title

Nellis Cab, LLC
9811 W. Charleston Blvd., #2-367
Las Vegas, NV 89117

Samuel A Schwartz
601 East Bridger Avenue
Las Vegas, NV 89101

A-Arrow Alignment, LLC
5441 S Decatur Blvd.
Las Vegas, NV 89118

Aflac Group Insurance
PO Box 84069
Columbus, GA 31908

AGR Windshields, LLC
5330 Cameron St, #27
Las Vegas, NV 89118

Airgas USA, LLC
1671 Glendale Ave.
Sparks, NV 89431

Anthony's Towing
5375 S. Cameron St, #A1
Las Vegas, NV 89118

Bank of America
PO Box 660441
Dallas, TX 75266-0441

California State Disbursement Unit
PO Box 989067
West Sacramento, CA 95798

City Express #8 - Trop Stop
4885 W Tropicana Ave.
Las Vegas, NV 89103

City of Las Vegas
495 S. Main St. 1
Las Vegas, NV 89101

Clark County Department of Aviation
5757 Wayne Newton Blvd.
Las Vegas, NV 89119

Commerce Auto Towing, Inc.
1407 S Industrial Rd.
Las Vegas, NV 89102

Decision Dynamics, LLC
2915 Sapra St.
Thousand Oaks, CA 91362

Dept. of Employment, Training and Rehab
Employment Security Division
500 E. Third Street
Carson City, NV 89713

Florida State Disbursement Unit
P.O. Box 8500
Tallahassee, FL 32314-8500

Health Plan of Nevada
2720 N Tenaya Way
Las Vegas, NV 89128

Hostmeister.com, LLC
PO Box, Las Vegas
Las Vegas, NV 89178

Humana Insurance Co.
101 E. Main St.
Louisville, KY 40202

Internal Revenue Service
Attn: Centralized Insolvency Operation
PO Box 7346
Philadelphia, PA 19101-7346

Kaptyn, Inc.
675 S Wynn Rd.
Las Vegas, NV 89103

Loomis
3370 Palm Pkwy
Las Vegas, NV 89104

Lucky Cab Co.
4195 West Diablo Drive
Las Vegas, NV 89118

Nevada Department of Motor Vehicles
55 Wright Way
Carson City, NV 89711

Nevada Department of Taxation
700 East Warm Springs Road, 2nd Floor
Las Vegas, NV 89119

Nevada Dept of Taxation, BK Section
555 E. Washington Ave #1300
Las Vegas, NV 89101

Nevada Employment Security Division
Contributions Section, 500 East Third St
Carson City, NV 89713

Nevada State Treasurers Office
101 N. Carson Street, Suite 4
Carson City, NV 89701

Nevada Taxi Cab Authority
2090 E Flamingo Rd, Ste 200
Las Vegas, NV 89119

Occupational Heath Centers of the SW
4060 N Martin Luther King Blvd.
North Las Vegas, NV 89032

Office of the United States Trustee
300 Las Vegas Blvd. S., Suite 4300
Las Vegas, NV 89101

Pressone
70 Sunrise Hwy, Suite 500
Valley Stream, NY 11581

RJR Insurance Company, Inc.
10050 Crosstown Cir, Ste 105
Eden Prairie, MN 55344

Silver Lake Auto Body
4405 E Colton Ave #106
Las Vegas, NV 89115

Smog Busters
2711 E Sahara Ave.
Las Vegas, NV 89104

Southstate Bank of Florida
1101 First Street South
Winter Haven, FL 33880

State Coll & Disb Unit - SCADU
PO Box 98950
Las Vegas, NV 89193-8950

Sun Cab, Inc.
9811 West Charleston Blvd., #2-367
Las Vegas, NV 89117

Two-Way Communications
4674 S Valley View Blvd.
Las Vegas, NV 89103

Uber Smog, LLC
4895 W Tropicana Ave.
Las Vegas, NV 89103

Western States Towing
1650 Marathon Dr.
Las Vegas, NV 89108

Wex Health
1 Hancock Street
Portland, ME 04101

**United States Bankruptcy Court
District of Nevada**

In re Nellis Cab, LLC

Debtor(s)

Case No.

Chapter 11

CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for Nellis Cab, LLC in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

Sun Cab, Inc.
9811 West Charleston Boulevard, #2-367
Las Vegas, NV 89117

☐ None [Check if applicable]

December 5, 2025

Date

/s/ Samuel A Schwartz

Samuel A Schwartz 10985

Signature of Attorney or Litigant

Counsel for Nellis Cab, LLC

Schwartz

601 E Bridger Ave
Las Vegas, NV 89101
(702) 385-5544 Fax:
ecf@nvfirm.com

**ACTION BY WRITTEN CONSENT OF
THE SOLE MEMBER AND MANAGER OF NELLIS CAB, LLC
A NEVADA LIMITED LIABILITY COMPANY**

Dated as of November 26, 2025

The UNDERSIGNED, constituting the sole member (the “**Member**”) and the sole manager (the “**Manager**”) of NELLIS CAB, LLC, a Nevada series limited liability company (the “**Company**”), hereby consent in writing to the adoption of the following resolutions,¹ which actions are hereby deemed effective as of the date set forth above:

WHEREAS, the Member and Manager have reviewed and considered the financial and operational condition of the Company and the Company’s business on the date hereof, including the historical performance of the Company, the assets of the Company, the current and long-term liabilities of the Company, the viability of the Company’s business, and the strategic alternatives available to the Company;

WHEREAS, the Member and Manager have had the opportunity to consult with the management of the Company and the Company’s advisors and to fully consider the strategic alternatives available to the Company, including, without limitation, the relative risks and benefits of pursuing a bankruptcy proceeding under the provisions of Chapter 11 of Title 11 of the United States Code (as amended, the “**Bankruptcy Code**”); and

WHEREAS, the Member and Manager deem it advisable and in the best interests of the Company and its creditors, interest holders, and other parties in interest, to consent to and adopt, in the name of and on behalf of the Company, the following resolutions:

NOW, THEREFORE, IT IS:

RESOLVED, that it is desirable and in the best interests of the Company and its creditors, employees, and other interested parties that a voluntary Chapter 11 bankruptcy petition be filed by the Company, seeking relief under the provisions of Chapter 11 of the Bankruptcy Code (the “**Chapter 11 Case**”) in the United States Bankruptcy Court for the District of Nevada; and it is further

RESOLVED, that, Michelle Langille (the “**Authorized Person**”), be, and is, authorized and directed to execute and file on behalf of the Company, all petitions, schedules, lists, motions, applications, and other papers or documents with the appropriate court under the Bankruptcy Code and to take any and all action

¹ RRSC NTD: not needed with Nevada LLCs (no quorum or meeting requirement)

that is necessary, proper, or advisable to obtain such relief under the Bankruptcy Code, including, without limitation, any action necessary to maintain the ordinary course operation of the Company's business; and it is further

RESOLVED, that the law firm of SCHWARTZ LAW, PLLC ("**Schwartz Law**") be employed as counsel to the Company to represent and assist the Company in carrying out the Company's duties under the Bankruptcy Code and to take any and all actions to advance the Company's rights, including the preparation of pleadings and filings in connection with the Chapter 11 Case, and the Authorized Person of the Company is hereby authorized and directed to execute appropriate retention agreements, pay appropriate retainers prior to and upon the filing of the Chapter 11 Case, and to cause to be filed an appropriate application for authority to retain the services of Schwartz Law; and it is further

RESOLVED, that the law firm of RICE REUTHER SULLIVAN & CARROLL, LLP ("**RRSC**") be employed as special counsel to the Company to represent and assist the Company in carrying out special litigation and transactional duties related to ongoing pre-bankruptcy litigation as well as the sale of the Company and to take any and all actions to advance the Company's rights, and the Authorized Person of the Company is hereby authorized and directed to execute appropriate retention agreements, pay appropriate retainers prior to and upon the filing of the Chapter 11 Case, and to cause to be filed an appropriate application for authority to retain the services of RRSC; and it is further

RESOLVED, that Force 10 Partners ("**Force 10**") be employed as investment bankers and financial advisor to the Company to represent and assist the Company in carrying out bankruptcy sale of the Company's assets pursuant to the Bankruptcy Code, and the Authorized Person of the Company is hereby authorized and directed to execute appropriate retention agreements, pay appropriate retainers prior to and upon the filing of the Chapter 11 Case, and to cause to be filed an appropriate application for authority to retain the services of Force 10; and it is further

RESOLVED, that the Authorized Person of the Company be, and hereby is, authorized and directed to employ any other individual and/or firm as professionals or consultants to the Company as are deemed necessary or advisable to represent and assist the Company in carrying out the Company's duties under the Bankruptcy Code, and in connection therewith, the Authorized Person of the Company is hereby authorized and directed to execute appropriate retention agreements, and to cause to be filed an appropriate application for authority to retain the services of such firms; and it is further

RESOLVED, that the Authorized Person is hereby authorized and empowered to execute, deliver, file, and perform any agreement, document, or any amendment to the foregoing, in the name and on behalf of the Company, as may be necessary or advisable for the Company to obtain post-petition, all on such terms as the Authorized Person deems necessary or advisable in order to carry out the purpose and intent of the foregoing resolutions; and it is further

RESOLVED, that the Authorized Person is hereby authorized, empowered, and directed, in the name and on behalf of the Company, to take such additional actions, to perform all acts and deed, and to execute, ratify, certify, deliver, file, and record such additional agreements, notices, certificates, instruments, applications, payments, letters, and documents as any of them may deem necessary or advisable to implement the provisions of the foregoing resolutions, and to appoint such agents on behalf of the Company as such Authorized Person may deem necessary or advisable in connection with any financing arrangement or the sale of assets, and the transactions contemplated by any of the foregoing, the authority for the taking of such action to be conclusive evidence thereof; and it is further

RESOLVED, that the Authorized Person is hereby authorized, empowered and directed, in the name and on behalf of the Company, to open and maintain one or more debtor-in-possession bank accounts for the Company, at such banks as the Authorized Person may determine, and that in connection therewith the Authorized Person may sign checks, authorize wire transfers and execute and deliver on behalf of the Company, such forms of banking resolutions as such banks may request and the Authorized Person may approve, which resolutions, when executed by such Authorized Person and inserted into the minute book of the Company, shall be deemed to be adopted by the Company with the same full force and effect as if such resolutions had been set forth herein in their entirety; and it is further

RESOLVED, that the Authorized Person is hereby authorized to enter into one or more debtor-in-possession financing facilities, as may be determined by the Company's management, in order to finance the Chapter 11 case and the Company's operations going forward; and it is further

RESOLVED, that all of the acts and transactions taken by the Authorized Person, the Member, and/or the Manager, in the name and on behalf of the Company, relating to matters contemplated by the foregoing resolutions, which acts would have been approved by the foregoing resolutions except that such acts were taken prior to the execution of these resolutions, are hereby in all respects confirmed, approved, and ratified; and it is further

RESOLVED, that this written consent may be executed in any number of counterparts and by facsimile, portable document format, or other reproduction, and such execution shall be considered valid, binding, and effective for all purposes.

[No Further Text. Signature Page Follows.]


IN WITNESS WHEREOF, the undersigned has executed this written consent as of the date first written above.

SOLE MEMBER

**SUN CAB, INC., a Nevada
corporation**

By: 
Name: Michelle Langille
Title: President

SOLE MANAGER


Name: Michelle Langille