

1 **BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY**

2
3 IN THE MATTER OF THE JOINT) Date of Hearing: TBA
4 APPLICATION OF DESERT CAB CO. TO) Time of Hearing: TBA
5 ADJUST TAXICAB CHARGES TO INCLUDE)
A PASS-THROUGH SOFTWARE LICENSE)
6 CHARGE)

7 **DESERT CAB CO.'S OPPOSITION TO CURB MOBILITY, LLC'S AMENDED PETITION**
8 **FOR LEAVE TO INTERVENE IN THE AMENDED APPLICATION OF DESERT CAB CO.**
9 **TO ADJUST TAXICAB CHARGES TO INCLUDE A PASS-THROUGH SOFTWARE**
10 **LICENSE CHARGE**

11 COMES NOW, Applicant, Desert Cab Co., and respectfully submits this Opposition to Curb
12 Mobility, LLC's Petition to Intervene pursuant to NAC 706.39655.

13 **INTRODUCTION**

14 The Movant, Curb Mobility, LLC, alleges in its Petition to Intervene that the Application "(1)
15 contains certain statements of alleged fact regarding Petitioner and certain third-party patents that are
16 inaccurate and (2) requests an action by the Authority that would significantly affect Petitioner and
17 the common motor carriers to whom Petitioner provides its products and services." See Petition at p.
18 2, lns 7-12.

19 **BASIS FOR OBJECTION**

20 1. Petitioner is not a common motor carrier operating under Certificates of Public Convenience
21 and Necessity issue by the Authority and is not authorized to provide taxicab service within Clark
22 County, Nevada.

23 2. Petitioner is not directly and substantially affected by the proposed Amended Application of
24 Desert Cab Co. to adjust taxicab charges to include a fifty cent (\$0.50) per taxi ride pass-through
25 software license charge.

26 3. Petitioner does not have a direct or substantial interest in this proceeding as required pursuant
27 to NAC 706.894(1), to be entitled to status as an intervenor.

28 4. In contravention of NAC 706.894(3), Petitioners' intervention will unduly broaden the issues
in this proceeding and fail to contribute a full and fair evaluation of the matter before the Authority.

1 LEGAL ARGUMENT

2 To be entitled to intervention pursuant to NAC 706.3965, the movant seeking intervention
3 must demonstrate a direct and substantial interest in the above-referenced matter. In this case,
4 Petitioner has cited no basis or evidence in support of its purported standing, except some generalized
5 statements regarding third-party patents that have no bearing on the movant. The current Application
6 does not impact Petitioner, nor does it impact Petitioner’s provision of services. Moreover, Petitioner
7 does not purport to have any ownership interest in IVSC’s patents, that underlying this application,
8 nor does the movant have any economic interest in the terms and conditions pass through charge.
9 Most critically, Movant is not a licensed entity that is subject to the Authority and has no participation
10 or involvement with those transactions pending by and between Applicant, Kaptyn and the third-party
11 patent holder. Accordingly, Petitioner’s interests fall outside of any zone of interest entitling it to grant
12 of leave.

13 CONCLUSION

14 WHEREFORE, based on the above Opposition and Application which are on file herein,
15 Applicant hereby requests:

- 16 1. That, pursuant to NAC 706.3965, the Petition to Intervene be denied;
17 2. That the Application be approved to require all taxicabs in Clark County, Nevada, to
18 impose a pass-through software license charge of .50 cents on all taxicab trips originating
19 in Clark County, Nevada; and
20 3. For any other such relief that may be just and proper to implement the software license
21 charge.

22 DATED this 7th day of April, 2025.

23 BROWN BROWN & PREMSRIRUT

24 /s/ Puoy K. Premsrirut

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CERTIFICATE OF SERVICE

I hereby certify that on the 7^h day of April, 2025, I served via electronic mail, a true and accurate copy of the foregoing to the following persons:

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