

BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY

IN THE MATTER OF THE APPLICATION OF)
DESERT CAB CO. TO ADJUST TAXICAB)
CHARGES TO INCLUDE A PASS-THROUGH)
SOFTWARE LICENSE CHARGE)

INTERESTED PARTY / PROPOSED INTERVENER IVSC IP LLC'S RESPONSE TO CURB MOBILITY, LLC'S AMENDED PETITION FOR LEAVE TO INTERVENE IN THE AMENDED APPLICATION OF DESERT CAB CO. TO ADJUST TAXICAB CHARGES TO INCLUDE A PASS-THROUGH SOFTWARE LICENSE CHARGE

COMES NOW Interested Party and Proposed Intervener, IVSC IP LLC ("IVSC"), by and through its undersigned counsel, D. Neal Tomlinson, and hereby submits its Response to Curb Mobility, LLC's ("Curb") Amended Petition for Leave to Intervene ("PLTI"), pursuant to NAC 706.885 and NAC 706.894, in the Amended Application of Desert Cab Co. to Adjust Taxicab Charges to Include a Pass-Through Software License Charge.

DISCUSSION

Pursuant to NAC 706.885(1), parties to proceedings before the Taxicab Authority (the "Authority") must be entitled as an applicant, complainant, respondent, intervener or interested party. In its PLTI, Curb has requested to "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 ad file briefs, as well as participate in all other aspects of this matter". Based on Curb's prior pleadings on file with the Authority, the statements made in its PLTI at paragraphs 5 and 6¹, and its counsel's arguments during the prior public hearing, it is abundantly clear to everyone that Curb's true intention it to unduly broaden the issues in this matter by attempting to litigate the subject Amended Application as a patent case, rather than as a rate case. Indeed, Desert Cab Co. filed its Amended Application specifically as an application for changes of rates or rules as clearly provided for by NRS 706.8819(1)(a), NAC 706.471 and NAC 706.909.² Because of these facts, IVSC opposes

¹ IVSC specifically reserves all rights and, if necessary and when appropriate, will respond to Curb's unsupported allegations.

² See Desert Cab Co.'s Amended Application at p. 1.

1 Curb's PLTI on the basis that allowing Curb to participate in this matter as an intervener would,
2 undoubtedly, unduly broaden the issues and therefore run contrary to NAC 706.894(3). However,
3 Curb can and should still be able to participate in this matter as an "interested party" pursuant to NAC
4 706.885(1)(e) -- but they absolutely should not be able to hijack this Amended Application by
5 attempting to litigate it as a patent case.


6 **CONCLUSION**

7 WHEREFORE, Interested Party / Proposed Intervener IVSC hereby requests:

- 8 1. That, pursuant to NAC 706.894(3), Curb's PLTI be denied and not allowed to participate
9 in this Amended Application as an Intervener, but rather as an Interested Party pursuant to
10 NAC 706.885(1)(e); and
11 2. For any other such relief that may be just and proper under the circumstances presented.

12 DATED this 7^h day of April, 2025.

13 IVSC IP LLC

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