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BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY

In the matter of the Amended Application of
Desert Cab Co. to Adjust Taxicab Charges to
Include a Pass-Through Software License
Charge.

Order
After Second
Pre-Hearing Conference
With Additional or Revised
Deadlines

The second Pre-Hearing Conference in the above-entitled matter was held Wednesday, May 21, 2025, at 2:00 p.m. with discussions centering around discovery and motion deadlines. All documents will be served on all parties by email AND U.S. mail, with the original plus nine (9) copies delivered to the office of the Taxicab Authority ("**TA**") for filing no later than 3:00 p.m. on the due date, in order to assure the TA staff has appropriate time to receive and file the documents as oftentimes there is a wait for filing services. **Discovery requests and responses are typically exchanged between the parties but do not need to be filed at the TA office, unless relevant to a motion, a hearing, or to the hearing of the contested case itself as the submission of the trial exhibits.** There must be proof of service on all parties, with a Certificate of Service or similar attachment, to every document a party wants considered by the TA. All parties will immediately notify the TA's legal secretary Silvia at stoms@taxi.state.nv.us should parties change or alter their address, email, or otherwise have requests to change the service list.

1 Discovery: the deadlines imposed for this matter are streamlined and shortened as the
2 Taxicab Authority Board will hear this matter on **September 17-19, 2025**. Dates and deadlines
3 in this matter were promulgated and served on all parties on April 28, 2025, in the filed *First*
4 *Order After Pre-Hearing Conference* (a copy of that Order is attached hereto for your
5 convenience.) Please comply with BOTH orders. Do not forget to consult BOTH orders.

6
7 **ADDITIONAL** or **REVISED** deadlines discussed during or resulting from the Second Pre-
8 Hearing Conference are as follows:

- 9 • June 18, 2025: Pre-filed testimony of all witnesses, not just experts. **(Read together**
10 **with Order from April 28, 2025.)**
- 11 • June 23, 2025: Deadline for exchange of Supplemental Expert List and Supplementing
12 Expert Pre-filed testimony.
- 13 • July 7, 2025: Deadline for exchange of Rebuttal Expert List and Rebuttal Expert Pre-
14 filed testimony.
- 15 • July 15, 2025: Deadline for final exchange of Witness List (not expert list) and
16 supplement pre-filed witness and expert witness testimony. **If no expert witness and**
17 **pre-filed testimony have been designated and exchanged by June 23 by a party**
18 **hereto, there is no need to file a “supplement” as the Hearing Officer will**
19 **interpret the lack of a timely designation and pre-filed testimony as no expert**
20 **testimony planned or allowed. Timely filed designation of Rebuttal experts and**
21 **rebuttal expert Pre-filed testimony must be designated and exchanged by July 7,**
22 **2025, otherwise there is no need to supplement today as the Hearing Officer will**
23 **interpret the lack of a timely designation and pre-filed testimony as no rebuttal**
24 **expert testimony planned or allowed.**
- 25 • July 16, 2025: (Read together with Order from April 28, 2025.) **DISCOVERY**
26 **CUTOFF. DEADLINE to file Dispositive Motions.** In addition to the terms in the First
27 Order After Pre-Hearing Conference: **Prior to filing disputes/discovery disputes,**
28 **due no later than today, counsel must meet to discuss discovery issues with the**
29 **same level of detail and legal support as is contained in briefings filed with the**
30 **TA, together with an affidavit accompanying the discovery motion to detail the**
31 **specifics of the dispute resolution conference.**
- 32 • **July 27, 2025 (REVISION from July 29): Deadline for Oppositions to Discovery**
33 **Disputes/other disputes including Dispositive Motions.**
- 34 • **July 29, 2025: Deadlines for Replies/Responses to Oppositions to Discovery**
35 **Disputes/other disputes including Dispositive Motions.**
- 36 • July 30, 2025: 3rd Pre-Hearing Conference at the office of the Taxicab Authority,
37 located at **2090 E. Flamingo Road, Suite 200, Las Vegas, Nevada 89119**. Among
38 other items, to specifically discuss the extent of the meet and confer Order re
39 stipulations to undisputed facts and law: Prior to this 3rd Pre-Hearing Conference,

1 counsel must meet and confer to stipulate to undisputed facts and to undisputed law, to
2 condense exhibits and to agree to the admission of certain exhibits, limit duplicative
3 evidence, narrow the issues, and otherwise work towards efficiently conducting their
4 cases before the Board. This Pre-Hearing Conference will be taken off-calendar if the
5 Hearing Officer receives detailed confirmation that the parties have met and
6 accomplished this.

- 7 • September 5, 2025: Deadline for Pre-hearing Briefs for the Board, which must include a
8 summary of the relevant facts and an explanation of how the law applies to those facts,
9 and how each witness' testimony supports each fact and the law. Included will be the
10 proposed exhibit index, copies of all proposed exhibits, pre-filed testimony of all
11 witnesses-expert and otherwise. **Exhibits Bates Stamped with Original plus 9**
12 **copies to be provided to TA.**

13 HEARING TO BE HELD:

14 Nevada State Business Center, 3300 W. Sahara, 4th Floor, Nevada Room

15 Las Vegas, Nevada 89102

16 September 17 at 1:00 p.m.-4:00

17 September 18 at 9:30 a.m.-4:00

18 September 19 at 9:30 a.m.-4:00

19 Dated this 30th day of May, 2025.

20 BY THE AUTHORITY:

21 

22 Lona Webb, Hearing Officer
23 Nevada Taxicab Authority

CERTIFICATE OF MAILING

I, Silvia Toms, do hereby certify that on May 30, 2025,

I deposited in the U.S. mail, postage prepaid, via First Class Mail, and email, a true and correct copy of the foregoing **Order After Second Pre-Hearing Conference** to the following:

Desert Cab Co.	Puoy Premsrut, Esq. Brown Brown & Premsrut 520 S. 4 th Street, 2 nd Floor Las Vegas, Nevada 89101 puoy@brownlawlv.com	Desert Cab ATTN: George Balaban 4675 Wynn Road Las Vegas, NV 89103 gtbalaban@aol.com
Curb Mobility, LLC	Elliot Anderson, Esq. Greenberg Traurig, LLP 10845 Griffith Peak Drive, Suite 600 Las Vegas, Nevada 89135 andersonel@gtlaw.com	Las Vegas Litigation Docketing Greenberg Traurig, LLP 10845 Griffith Peak Drive, Suite 600 Las Vegas, Nevada 89135 lvlitdock@gtlaw.com
Curb Mobility, LLC	Joshua L. Raskin, Esq. Greenberg Traurig, LLP One Vanderbilt Avenue New York, NY 10017 raskinj@gtlaw.com	Vimal M. Kapadia, Esq. Greenberg Traurig, LLP One Vanderbilt Avenue New York, NY 10017 vimal.kapadia@gtlaw.com
Curb Mobility, LLC	CURB MOBILITY, LLC Attention: Amos Tamam, CEO 11-11 34 th Avenue Long Island City, NY 11106 legal@gocurb.com amos.tamam@gocurb.com	
IVSC IP LLC (Patent Holder)	D. Neal Tomlinson, Esq. 2857 Paradise Road, Suite 301 Las Vegas, NV 89109 neal@hyperionlawyers.com	
Kaptyn Technology, Inc.	Robert Yorio, Esq. Carr & Ferrell LLP 411 Borel Ave, Suite 603 San Mateo, CA 94402 yorio@carrferrell.com	Kent Brian Bathurst, Esq. Carr & Ferrell LLP 411 Borel Ave, Suite 603 San Mateo, CA 94402 bbathurst@carrferrell.com
Kaptyn Technology, Inc.	KAPTYN TECHNOLOGY, INC Attention: Andrew Meyers, CEO 4675 Wynn Road Las Vegas, Nevada 89103 andrew@kaptyn.com	

1 2 3 4 5 6	Nevada Yellow, Checker, Star Corporations, Newcab, and Taxi Management, LLC	Scott Scherer, Esq. (& Curb Mobility Co-counsel) Brownstein Hyatt Farber Schreck LLP 5520 Kietzke Lane, Suite 110 Reno, NV 89511 sscherer@bhfs.com	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
7 8 9 10 11	Deputy Attorney General	Jessica Guerra, Esq. (T.A. Staff Counsel) Deputy Attorney General Nevada Attorney General's Office 1 State of Nevada Way, Suite 100 Las Vegas, Nevada 89119 jguerra@ag.nv.gov	Joseph Ostunio, Esq. (T.A. Board Counsel) Deputy Attorney General Nevada Attorney General's Office 1 State of Nevada Way, Suite 100 Las Vegas, Nevada 89119 jostunio@ag.nv.gov

Dated this 30 day of May, 2025.

Silvia Toms
Employee of the Taxicab Authority

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BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY

In the matter of the Amended Application of
Desert Cab Co. to Adjust Taxicab Charges to
Include a Pass-Through Software License
Charge.

First Order
After Pre-Hearing Conference

The first Pre-Hearing Conference in the above-entitled matter was held Wednesday, April 23, 2025, at 1:30 p.m. with discussions centering around discovery deadlines. All documents will be served on all parties **by email AND U.S. mail**, with the original plus nine (9) copies delivered to the office of the Taxicab Authority for filing no later than 3:00 p.m. on the due date, in order to assure the TA staff has appropriate time to receive and file the documents as oftentimes there is a wait for filing services. There **must be proof of service** on all parties, with a Certificate of Service or similar attachment, to every document a party wants considered by the TA. As of this date, the service list is as follows and all parties will immediately notify the TA's legal secretary Silvia at stoms@taxi.state.nv.us should parties change or alter their address, email, or otherwise have requests to change the service list:

Desert Cab Co.	Puoy Premsrut, Esq. Brown Brown & Premsrut 520 S. 4 th Street, 2 nd Floor Las Vegas, Nevada 89101 puoy@brownlawlv.com	Desert Cab ATTN: George Balaban 4675 Wynn Road Las Vegas, NV 89103 gtbalaban@aol.com
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1	Curb Mobility, LLC	Joshua L. Raskin, Esq. Greenberg Traurig, LLP One Vanderbilt Avenue New York, NY 10017 raskini@gtlaw.com	Vimal M. Kapadia, Esq. Greenberg Traurig, LLP One Vanderbilt Avenue New York, NY 10017 vimal.kapadia@gtlaw.com
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10	Kaptyn Technology, Inc.	Robert Yorio, Esq. Carr & Ferrell LLP 411 Borel Ave, Suite 603 San Mateo, CA 94402 yorio@carrferrell.com	Kent Brian Bathurst, Esq. Carr & Ferrell LLP 411 Borel Ave, Suite 603 San Mateo, CA 94402 bbathurst@carrferrell.com
13	Kaptyn Technology, Inc.	KAPTYN TECHNOLOGY, INC Attention: Andrew Meyers, CEO 4675 Wynn Road Las Vegas, Nevada 89103 andrew@kaptyn.com	
16	Nevada Yellow, Checker, Star Corporations, Newcab, and Taxi Management, LLC	Scott Scherer, Esq. (& Curb Mobility Co-counsel) Brownstein Hyatt Farber Schreck LLP 5520 Kietzke Lane, Suite 110 Reno, NV 89511 sscherer@bhfs.com	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
23	Deputy Attorney General	Jessica Guerra, Esq. (T.A. Staff Counsel) Deputy Attorney General Nevada Attorney General's Office 1 State of Nevada Way, Suite 100 Las Vegas, Nevada 89119 jguerra@ag.nv.gov	Joseph Ostunio, Esq. (T.A. Board Counsel) Deputy Attorney General Nevada Attorney General's Office 1 State of Nevada Way, Suite 100 Las Vegas, Nevada 89119 jostunio@ag.nv.gov

1 Discovery: the deadlines imposed for this matter are streamlined and likely shortened
2 as the Board intends to hear this matter within a reasonable timeframe of 120-150 days.
3 Therefore, the dates and deadlines set forth below are subject to change, amendment and
4 alteration:

- 5 • Thursday May 1, 2025: Deadline for a brief statement (3 pages maximum) by each
6 party re narrowing the law and the issues to be determined by the Taxicab Authority
Board.
- 7 • May 7, 2025: Deadline for exchange of Index of List of Proposed Exhibits and
Witnesses and exchange thereof.
- 8 • May 21, 2025: Deadline for Initial List of Experts and their pre-filed testimony.
- 9 • May 21, 2025, at 2:00: Second Pre-Hearing Conference at **Nevada State Business**
10 **Center, 3300 W. Sahara, 4th Floor, Nevada Room, Las Vegas, Nevada 89102.**
Discussion will include, among other things, participation from the parties regarding this
11 current schedule (excepting the May 21 deadline for the Initial List of Expert and their
pre-filed testimony), the discovery limitations set forth below, and the ability of the
12 parties to stipulate to facts, applicable law, witnesses and exhibits.
- 13 • June 18, 2025: Deadline for Pre-filed testimony of all witnesses (experts due May 21
see above).
- 14 • July 16, 2025: Deadline for filing disputes/discovery disputes, with responses thereto
due July 29, 2025. Written discovery is limited to twenty (20) on another party in the
15 case, including sub-parts. Responses are due within fourteen (14) calendar days.
Objections to written discovery must not be boilerplate but must be stated with
16 specificity including the grounds for the objection with specific reasons including, for
instance, why is the request overly burdensome, oppressive, overly broad, or vague?
17 Discovery responses that do not comply will be deemed a waiver of that objection,
excepting as to privilege. Depositions are limited to one day of four (4) hours of
18 testimony. Subpoena duces tecum will be given with seven days' notice before service
to allow parties time to object. Should a party timely object, do not serve the subpoena
19 until or unless the hearing officer allows.
- 20 • August 1, 2025: Deadlines for other Briefs and Motions. Oppositions and responses
due within ten days.
- 21 • September 3, 2025: Deadlines for Supplemental Exchange of Responsive Documents
proposed to be used as Exhibits.
- 22 • September 5, 2025: Deadline for Pre-hearing Briefs for the Board, which must include a
summary of the relevant facts and an explanation of how the law applies to those facts,
23 and how each witness' testimony supports each fact and the law. Included will be the
proposed exhibit index, copies of all proposed exhibits, pre-filed testimony of all
24 witnesses-expert and otherwise.
- 25 • September 17, 18 & 19: Hearing on the Amended Application at **Nevada State**
Business Center, 3300 W. Sahara, 4th Floor, Nevada Room, Las Vegas, Nevada
26 **89102.**

1 The parties should meet and confer to condense discovery, including stipulations to
2 undisputed facts and law, narrowing the issues to be presented, limiting duplicative evidence,
3 and so forth. If they have not done so by May 21, 2025, an Order regarding the same will be
4 discussed during the Second Pre-Hearing Conference. Also to be considered during the
5 Second Pre-Hearing conference will be the stated limitation of the number of written discovery
6 responses and the stated length of depositions, if any.
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10 Dated this 20th day of April, 2025.

11 BY THE AUTHORITY:
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15 Lona Webb, Hearing Officer
16 Nevada Taxicab Authority
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CERTIFICATE OF MAILING

I, Silvia Toms, do hereby certify that on April 28, 2025,

I deposited in the U.S. mail, postage prepaid, via First Class Mail, and email, a true and correct copy of the foregoing **First Order After Pre-Hearing Conference** to the following:

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Dated this 28 day of April, 2025.

Silvia Toms
Employee of the Taxicab Authority