

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)

SECOND AMENDED APPLICATION OF DESERT CAB CO. TO ADJUST TAXICAB
CHARGES TO INCLUDE A PASS-THROUGH SOFTWARE LICENSE CHARGE

Applicant, Desert Cab, hereby further amends its Amended Application to conform to the evidence, pursuant to NRS 706.8819(1)(a), NAC 706.471 and NAC 706.909, to adjust taxicab charges to include a pass-through software license charge. This Amended Application is specifically 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, discussed below.

The Amended Application is further amended to conform to the evidence as follows:

1. Desert Cab adopts and fully incorporates into its Amended Application the following pre-filed, deposition and supplemental testimony, and exhibits thereto (as applicable) for each of the following witnesses:
 - a. Andrew J. Meyers,
 - b. Gerald "JJ" K. Bell, Jr.,
 - c. Christopher T. Bordonaro, and
 - d. Noah D. Mesel.

WHEREFORE, Applicant hereby requests:

1. That, pursuant to NRS 706.8819, this Amended Application be noticed to the public, a hearing conducted, and placed on an upcoming Taxicab Authority agenda for discussion and final decision;
2. That this Amended Application be approved to require all taxicabs in Clark County, Nevada, to impose a pass-through software license charge of \$0.50 on all taxicab trips originating in Clark County, Nevada, inclusive of 25% share of the fee (\$.125) to be paid

- 1 Kaptyn or any technology services company that provides the same or similar technology
2 as Kaptyn, at the election of the operator; and
3 3. For any other such relief that may be just and proper to implement the software license
4 charge.

5 DATED this 15th day of August 2025.

6 DESERT CAB CO.

7 */s/ George Balaban*

8 _____
9 George Balaban
10 President
11 4575 Wynn Road
12 Las Vegas, Nevada 89103
13 (702) 386-4828

12 BROWN BROWN & PREMSRIRUT

13 */s/ Puoy Premsrirut*

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15 Puoy Premsrirut, Esq.
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21 *Attorneys for Applicant*

CERTIFICATE OF SERVICE

I certify that I am an employee of Brown Brown & Premsrirut, and that on this 15th day of August, 2025, I caused to be served the foregoing **SECOND AMENDED APPLICATION OF DESERT CAB CO. TO ADJUST TAXICAB CHARGES TO INCLUDE A PASS-THROUGH SOFTWARE LICENSE CHARGE** upon all parties to this action via U.S. mail and email:

Desert Cab Co.	Puoy Premsrirut, Esq. Brown Brown & Premsrirut 520 S. 4 th Street, 2 nd Floor Las Vegas, Nevada 89101 puoy@brownlawlv.com kami@brownlawlv.com	Desert Cab ATTN: George Balaban 4675 Wynn Road Las Vegas, NV 89103 gtbalaban@aol.com
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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 7 8 9 10 11	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
12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Deputy Attorney General	Jessica Guerra, Esq. Paige L. Magaster, 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 pmagaster@ag.nv.gov rsunga@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 mfeeley@ag.nv.gov

/s/ Kami C. Vermillion
An Employee of BROWN BROWN & PREMSRIRUT