

BEFORE THE STATE OF NEVADA TAXICAB AUTHORITY

IN RE: APPLICATION BY PETEGLO, LLC-TPM, LLC: GEORGE BALABAN (AGTB LLC) MANANGER/MEMBER OF PETEGLO, LLC, AND BRAD BALABAN (BJ) AND DANA BALABAN, BOTH MEMBERS OF PETEGLO LLC-TPM LLC, FOR AUTHORITY TO ACQUIRE THE ASSETS INCLUDING THE CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY ("CPCN")

REPLY IN SUPPORT OF THE PETITION FOR LEAVE TO INTERVENE OF JULIE CHENOWETH AND LISA CHENOWETH

DEC 16 '25 FILED

Petitioners Julie Chenoweth and Lisa Chenoweth (collectively, the "Chenoweths"), by and through their counsel of record, Marquis Aurbach Chtd., submit this Response In Support of the Petition for Leave to Intervene in the Application filed by Peteglo, LLC-TPM, LLC ("Applicant").

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

Brian R. Hardy, Esq.
Nevada Bar No. 10068
Sarah C. Ethington, Esq.
Nevada Bar No. 16530
Hannah D. Gagow, Esq.
Nevada Bar No. 17195
10001 Park Run Drive
Las Vegas, Nevada 89145

A. THE CHENOWETHS' DIRECT AND SUBSTANTIAL INTEREST

The Chenoweths, daughters of the founders of Sun Cab, Inc., collectively hold a fifty percent (50%) equity ownership in the corporation. This is not a tangential or speculative claim; it is a controlling-level stake that inherently satisfies the "direct and substantial interest" standard under NAC 706.894. Any action affecting the company's assets, control, or value directly and profoundly impacts their interest.

Applicant's attempt to label the Chenoweths as mere "minority owners" is a mischaracterization and a disputed fact in the pending litigation. What is undisputed is that a fifty percent (50%) stake is not a minority position; it represents half of the entire corporate ownership. This proceeding will directly affect the value of their holdings and the control of the corporation.

1 Their interest is not in seeking corporate-law remedies, but in ensuring the legality of a transfer
2 that directly impacts their substantial ownership, a matter squarely within this Authority's purview.

3 **B. THE AUTOMATIC STAY IS DISPOSITIVE AND PRECLUDES**
4 **AUTHORITY ACTION**

5 Applicants concede Nellis Cab filed Chapter 11 on December 5, 2025, staying the district
6 court action, yet urge the Authority to approve now and let bankruptcy "effectuate the transfer"
7 later. " This argument fundamentally misinterprets bankruptcy law. The moment Nellis Cab filed
8 for Chapter 11 protection, the automatic stay under 11 U.S.C. § 362(a) was triggered. This stay is
9 not a suggestion; it is a statutory injunction that halts all actions to obtain or exercise control over
10 property of the bankruptcy estate, including administrative proceedings such at the instant matter.
11 Upon filing, all debtor property becomes estate property under 11 U.S.C. § 541, and § 362(a) stays
12 any act to obtain possession of or exercise control over estate property.

13 Nevada law is unequivocal: "a sale conducted during an automatic stay in bankruptcy
14 proceedings is invalid." *LN Management LLC Series 5105 Portraits Place v. Green Tree Loan*
15 *Servicing LLC*, 133 Nev. 394, 399 P.3d 359, 359 (2017); *see also SFR Investments Pool 1, LLC v.*
16 *U.S. Bank, N.A.*, 135 Nev. Adv. Op. 45, 449 P.3d 461, 464 (2019). This principle extends to any
17 administrative action that purports to authorize such a sale. Because the automatic stay bars any
18 act to "exercise control over property of the estate," this Authority is legally precluded from
19 approving the transfer of the CPCN, which is estate property, until the bankruptcy court grants
20 relief from the stay. Under 11 U.S.C. § 362(a), no entity, including administrative bodies, may
21 take actions that obtain possession of or exercise control over estate property. Therefore, this
22 Authority cannot authorize a transfer of estate assets absent stay relief.

23 Applicant's admission that the transfer requires authorization from the bankruptcy trustee
24 underscores the prematurity of this proceeding. The bankruptcy court has exclusive jurisdiction
25 over the disposition of estate assets. This Authority's approval is not a prerequisite to, nor a
26 substitute for, the bankruptcy court's explicit authorization. Any action by this Authority before
27 the bankruptcy court acts is without legal effect.

28 ///


D. CONCLUSION

For the foregoing reasons, the Chenoweth's have a direct and substantial interest in this matter, and the automatic stay bars this Authority from taking any action to approve the transfer of estate property. Intervention is necessary to protect their interests and ensure compliance with federal bankruptcy law. GIVEN THE FOREGOING, Petitioners Julie Chenoweth and Lisa Chenoweth respectfully request that the Authority grant the following relief:

1. Permission to intervene and participate fully with respect to this matter;
2. That this matter be continued until approval of the sale has been authorized by the bankruptcy court; and
3. For such other relief as appears just and proper in the premises.

Dated this 16th day of December, 2025.

MARQUIS AURBACH

By: 
Brian R. Hardy, Esq.
Nevada Bar No. 10068
Sarah C. Ethington, Esq.
Nevada Bar No. 16530
Hannah D. Gagow, Esq.
Nevada Bar No. 17195
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Petitioners Julie
Chenoweth and Lisa Chenoweth

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **REPLY IN SUPPORT OF THE PETITION FOR
LEAVE TO INTERVENE OF JULIE CHENOWETH AND LISA CHENOWETH** was
submitted for filing with the State of Nevada Taxicab Authority on the 16th day of December,
2025:

State of Nevada Taxicab Authority
2090 E. Flamingo Road, Suite 200
Las Vegas, NV 89119

I hereby further certify that I served a copy of this document by mailing a true and correct
copy thereof, postage prepaid, addressed to the following recipients:

David A. Carroll, Esq. Anthony J. DiRaimondo, Esq. Robert E. Opdyke, Esq. Rice Reuther Sullivan & Carroll, LLP 3800 Howard Hughes Parkway, Suite 1200 Las Vegas, Nevada 89169 dcarroll@rrsc-law.com adiraimondo@rrsc-law.com ropdyke@rrsc-law.com ktantay@rrsc-law.com Attorneys for Defendant Sun Cab, Inc.	Jarrod L. Rickard, Esq. Katie L. Cannata, Esq. Semenza Rickard Law 10161 Park Run Drive, Suite 150 Las Vegas, Nevada 89145 alb@semenzarickard.com klc@semenzarickard.com oak@semenzarickard.com jlr@semenzarickard.com Attorneys for Defendant Michelle Langille
COOPER LEVENSON Kimberly Maxon-Rushton, Esq. Nevada Bar No. 5065 3016 W. Charleston Blvd. Suite 195 Las Vegas, NV 89102 Attorneys for Applicants	Office of the Attorney General 1 State of Nevada Way Suite 100 Las Vegas, NV 89119
Krisanne Cunningham, Esq. 3800 Howard Huges Parkway, Suite 1200 Las Vegas, NV 89169	Samuel Schwartz, Esq. 601 E. Bridger Rd. Las Vegas, Nevada 89101


An employee of Marquis Aurbach