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10 *Attorneys for Defendant Frias Management, LLC*

11 **UNITED STATES DISTRICT COURT**  
 12 **DISTRICT OF NEVADA**

13 THEODORE TRAPP, on his own behalf and  
 14 on behalf of all others similarly situated.

15 Plaintiff,

16 vs.

CASE NO. 2:09-CV-00995-LDG-GWF

**DEFENDANT FRIAS MANAGEMENT,  
 LLC'S DEMAND FOR SECURITY  
 OF COSTS**

17 BIG POPPA'S, LLC, a Nevada limited  
 liability company d/b/a BADDABING  
 18 MEN'S CLUB; SKY TOP VENDING,  
 INC., a Nevada corporation d/b/a CAN  
 19 CAN ROOM; LA FUENTE, INC., a  
 Nevada corporation d/b/a CHEETAH'S;  
 20 C.P. FOOD AND BEVERAGE, INC., a  
 Nevada corporation d/b/a CLUB  
 21 PARADISE; DÉJÀ VU SHOWGIRLS OF  
 LAS VEGAS, LLC, a Nevada limited  
 liability company d/b/a DÉJÀ VU  
 22 SHOWGIRLS; PALOMINO CLUB, INC.,  
 a Nevada corporation d/b/a PALOMINO  
 23 CLUB; SHAC, LLC, a Nevada corporation  
 d/b/a SAPPHIRE; K-KEL, INC., a Nevada  
 24 corporation d/b/a SPEARMINT RHINO;  
 D.2801 WESTWOOD, INC., a Nevada  
 25 corporation d/b/a TREASURES; LITTLE  
 DARLINGS OF LAS VEGAS, LLC, a  
 26 Nevada limited liability company d/b/a  
 LITTLE DARLINGS; O.G. ELIADES,  
 27 A.D., LLC, a Nevada limited liability  
 company d/b/a OLYMPIC GARDENS ;  
 28 LAS VEGAS ENTERTAINMENT, LLC, a

1 Nevada limited liability company d/b/a  
2 LARRY FLYNT'S HUSTLER CLUB;  
3 MICHAEL A. SALTMAN d/b/a MINXX;  
4 RICK'S LAS VEGAS; FRIAS  
5 MANAGEMENT, LLC, a Nevada limited  
6 liability company d/b/a ACE CAB  
7 COMPANY and A-NORTH LAS VEGAS  
8 CAB; WESTERN CAB COMPANY, a  
9 Nevada corporation d/b/a WESTERN CAB  
10 COMPANY and WESTERN LIMOUSINE;  
11 NEVADA CHECKER CAB  
12 CORPORATION, a Nevada corporation  
13 d/b/a NEVADA CHECKER CAB  
14 COMPANY; NEVADA STAR CAB  
15 CORPORATION, a Nevada corporation  
16 d/b/a STAR CAB COMPANY; NEVADA  
17 YELLOW CAB CORPORATION, a  
18 Nevada corporation d/b/a YELLOW CAB  
19 COMPANY; LUCKY CAB COMPANY  
20 OF NEVADA, a Nevada corporation d/b/a  
21 LUCKY TRANS; SUN CAB, INC., a  
22 Nevada corporation d/b/a NELLIS CAB  
23 COMPANY; CLS NEVADA, LLC, a  
24 Nevada limited liability company d/b/a  
25 CLS TRANSPORTATION LAS VEGAS;  
26 ON DEMAND SEDAN SERVICES, LLC,  
27 a Nevada limited liability company d/b/a  
28 ODS LIMOUSINES and ODS  
CHAUFFEURED TRANSPORTATION;  
BLS LIMOUSINE SERVICE OF LAS  
VEGAS INC.; DESERT CAB, INC., a  
Nevada corporation d/b/a DESERT CAB  
COMPANY and ODYSSEY LIMOUSINE;  
BELL TRANS A NEVADA  
CORPORATION, a Nevada corporation  
d/b/a BELL TRANS; TONY CHONG, an  
individual; and DOE EMPLOYEES 1-  
1000;

Defendants.

**To: THEODORE TRAPP, Plaintiff; and**

**To: JAY EDELSON, RAFEY BALABANIAN, and JAMES SMYTH his attorneys.**

Pursuant to NRS 18.130, Frias Management, LLC hereby makes demand upon Plaintiff, who resides out of State, for security in the amount of Five Hundred and No/100 Dollars (\$500.00) for costs and charges which may be awarded herein against Plaintiff. The requirements of NRS 18.130 apply to actions in the United States District Court, District of Nevada. Truck Ins.

1 Exchange, 683 F. Supp. 223, 227-28 (D. Nev. 1988); Hamar v. Hyatt Corp., 98 F.R.D. 305, 305-  
2 06 (D. Nev. 1983).

3 DATED this 19<sup>th</sup> day of June, 2009.

4  
5  
6 By: 

7 D. NEAL TOMLINSON, ESQ.  
8 WAYNE GROSS, ESQ.  
9 MICHAEL D. STEIN, ESQ.  
10 BRIAN R. REEVE, ESQ.  
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14 -and-

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19 *Attorneys for Defendant Frias Management, LLC*  
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CERTIFICATE OF SERVICE

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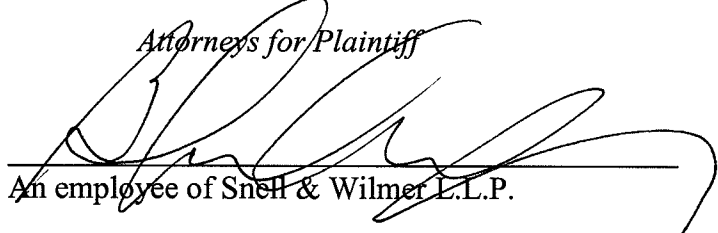
I certify that I am an employee of Snell & Wilmer, L.L.P., and that on the 19<sup>th</sup> day of June, 2009, I electronically transmitted the **DEFENDANT FRIAS MANAGEMENT, LLC'S DEMAND FOR SECURITY OF COSTS** to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the counsel listed below, who have registered to receive Electronic Filing:

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Rafey Balabanian, Esq.  
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*Attorneys for Plaintiff*

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An employee of Snell & Wilmer L.L.P.

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