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12 *Attorneys for Defendant Frias Management, LLC*

13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 THEODORE TRAPP, on his own behalf and  
16 on behalf of all others similarly situated.

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

17 Plaintiff,

18 vs.

**DEFENDANT FRIAS MANAGEMENT,  
LLC'S JOINDER TO BELL TRANS'  
MOTION TO DISMISS [DOC. #191]  
AND SUPPLEMENT TO MOTION TO  
DISMISS [DOC. #192]**

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

1 Nevada limited liability company d/b/a  
2 LITTLE DARLINGS; O.G. ELIADES,  
3 A.D., LLC, a Nevada limited liability  
4 company d/b/a OLYMPIC GARDENS ;  
5 LAS VEGAS ENTERTAINMENT, LLC, a  
6 Nevada limited liability company d/b/a  
7 LARRY FLYNT'S HUSTLER CLUB;  
8 MICHAEL A. SALTMAN d/b/a MINXX;  
9 RICK'S LAS VEGAS; FRIAS  
10 MANAGEMENT, LLC, a Nevada limited  
11 liability company d/b/a ACE CAB  
12 COMPANY and A-NORTH LAS VEGAS  
13 CAB; WESTERN CAB COMPANY, a  
14 Nevada corporation d/b/a WESTERN CAB  
15 COMPANY and WESTERN LIMOUSINE;  
16 NEVADA CHECKER CAB  
17 CORPORATION, a Nevada corporation  
18 d/b/a NEVADA CHECKER CAB  
19 COMPANY; NEVADA STAR CAB  
20 CORPORATION, a Nevada corporation  
21 d/b/a STAR CAB COMPANY; NEVADA  
22 YELLOW CAB CORPORATION, a  
23 Nevada corporation d/b/a YELLOW CAB  
24 COMPANY; LUCKY CAB COMPANY  
25 OF NEVADA, a Nevada corporation d/b/a  
26 LUCKY TRANS; SUN CAB, INC., a  
27 Nevada corporation d/b/a NELLIS CAB  
28 COMPANY; CLS NEVADA, LLC, a  
Nevada limited liability company d/b/a  
CLS TRANSPORTATION LAS VEGAS;  
ON DEMAND SEDAN SERVICES, LLC,  
a Nevada limited liability company d/b/a  
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.

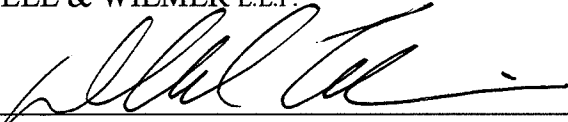
Defendant FRIAS MANAGEMENT, LLC ("Frias"), by and through its counsel, SNELL & WILMER LLP and KEMP, JONES & COULTHARD LLP, hereby submits its Joinder in Bell Trans' Motion to Dismiss filed on August 24, 2009 and Supplement to Motion to Dismiss filed on August 5, 2009. This Joinder incorporates Bell Trans'

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Motion to Dismiss and Supplement in full by reference.

DATED this 28<sup>th</sup> day of August, 2009.

SNELL & WILMER L.L.P.



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**CERTIFICATE OF SERVICE**

I certify that I am an employee of Snell & Wilmer, L.L.P., and that on the 28<sup>th</sup> day of August, 2009, I electronically transmitted the **DEFENDANT FRIAS MANAGEMENT, LLC'S JOINDER TO BELL TRANS' MOTION TO DISMISS** to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all attorneys of record in this matter.

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