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EXHIBIT A

1 Jay Edelson, Esq. (ARDC No. 6239287) (*Admitted Pro Hac Vice*)
Rafey Balabanian, Esq. (ARDC No. 6285687) (*Admitted Pro Hac Vice*)
2 KAMBEREDELSON LLC
350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654
3 Tel: 312.589.6370
Fax: 312.589.6378
4 *Attorneys for Plaintiff*
THEODORE TRAPP and the putative class

5 D. Neal Tomlinson, Esq.
6 Snell & Wilmer, LLP
3883 Howard Hughes Parkway, Suite 1100
7 Las Vegas, Nevada 89169
Tel: 702.784.5200
8 Fax: 792.784.5252
Attorneys for Defendant
9 FRIAS MANAGEMENT, LLC

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

12 THEODORE TRAPP, on his own behalf and
on behalf of all others similarly situated,

13 Plaintiff,

14 v.

15 BIG POPPA'S, LLC, a Nevada limited
16 liability company d/b/a BADDA BING
MEN'S CLUB, *et al.*,

17 Defendants.

Case No. 2:09-cv-00995

[PROPOSED]
JOINT STIPULATION OF DISMISSAL
WITHOUT PREJUDICE BETWEEN
PLAINTIFF AND DEFENDANT FRIAS
MANAGEMENT, LLC

Honorable Lloyd D. George

Magistrate Judge Peggy A. Leen

18
19 Plaintiff Theodore Trapp ("Plaintiff" or "Trapp") and Defendant Frias Management,
20 LLC, through their respective counsel, pursuant to Rule 41(a)(2) of the Federal Rules of Civil
21 Procedure, hereby stipulate and agree that the above-captioned matter, including any and all
22 claims asserted therein, shall be dismissed without prejudice and with each Party to bear their
23 own costs as to Defendant Frias Management, LLC. The Parties further stipulate and agree that
nothing in this Stipulation shall operate to affect the status of the other defendants in this matter.

24 **IT IS SO STIPULATED.**

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THEODORE TRAPP, individually and on behalf of all others similarly situated

FRIAS MANAGEMENT, LLC, a Nevada limited liability company,

By: /s/ Jay Edelson
Jay Edelson (ARDC No. 6239287)
Rafey S. Balabanian (ARDC No. 6285687)
KAMBEREDELSON LLC
350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654
Tel: 312.589.6370
Fax: 312.589.6378
Attorneys for Plaintiff

By: /s/ D. Neal Tomlinson
D. Neal Tomlinson, Esq.
Snell & Wilmer, LLP
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
Tel: 702.784.5200
Fax: 702.784.5252
Attorneys for Defendants

1 Jay Edelson, Esq. (ARDC No. 6239287) (*Admitted Pro Hac Vice*)
Rafey Balabanian, Esq. (ARDC No. 6285687) (*Admitted Pro Hac Vice*)
2 KAMBEREDELSON LLC
350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654
3 Tel: 312.589.6370
Fax: 312.589.6378
4 *Attorneys for Plaintiff*
THEODORE TRAPP and the putative class

5 John T. Moran, Jr., Esq. (Nevada Bar No. 2271)
6 Jeffrey A. Bendavid, Esq. (Nevada Bar No. 6220)
Justin W. Smerber, Esq. (Nevada Bar No. 10761)
7 Moran Law Firm, LLC
630 South 4th Street
8 Las Vegas, Nevada 89101
Tel: 702.384.8424
9 *Attorneys for Defendant*
WESTERN CAB COMPANY,
10 LUCKY CAB COMPANY OF NEVADA,
ON DEMAND SEDAN SERVICES, LLC,
11 BLS LIMOUSINE SERVICES OF LAS VEGAS, INC.
DESERT CAB, INC. and SUN CAB, INC.

12
13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

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

16 Plaintiff,

17 v.

18 BIG POPPA'S, LLC, a Nevada limited
liability company d/b/a BADDA BING
19 MEN'S CLUB, *et al.*,

20 Defendants.

Case No. 2:09-cv-00995

[PROPOSED]
JOINT STIPULATION OF DISMISSAL
WITHOUT PREJUDICE BETWEEN
PLAINTIFF AND DEFENDANTS
WESTERN CAB COMPANY, LUCKY
CAB COMPANY OF NEVADA, ON
DEMAND SEDAN SERVICES, LLC, BLS
LIMOUSINE SERVICES OF LAS
VEGAS, INC., DESERT CAB, INC., AND
SUN CAB, INC.

Honorable Lloyd D. George

Magistrate Judge Peggy A. Leen

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23
24 Plaintiff Theodore Trapp and Defendants Western Cab Company, a Nevada corporation
d/b/a Western Cab Company and Western Limousine, Lucky Cab Company of Nevada, a

1 Nevada corporation d/b/a Lucky Trans, On Demand Sedan Services, LLC, a Nevada limited
2 liability company d/b/a ODS Limousine and ODS Chauffeured Transportation, BLS Limousine
3 Services of Las Vegas, Desert Cab, Inc., a Nevada corporation d/b/a Desert Cab Company, and
4 Sun Cab, Inc., a Nevada corporation d/b/a Nellis Cab Company, through their respective counsel,
5 pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, hereby stipulate and agree that
6 the above-captioned matter, including any and all claims asserted therein, shall be dismissed
7 without prejudice and with each Party to bear their own costs as to Defendants Western Cab
8 Company, a Nevada corporation d/b/a Western Cab Company and Western Limousine, Lucky
9 Cab Company of Nevada, a Nevada corporation d/b/a Lucky Trans, On Demand Sedan Services,
10 LLC, a Nevada limited liability company d/b/a ODS Limousine and ODS Chauffeured
11 Transportation, BLS Limousine Services of Las Vegas, Desert Cab, Inc., a Nevada corporation
12 d/b/a Desert Cab Company, and Sun Cab, Inc., a Nevada corporation d/b/a Nellis Cab Company.
13 The Parties further stipulate and agree that nothing in this Stipulation shall operate to affect the
14 status of the other defendants in this matter.

15 **IT IS SO STIPULATED.**

16 THEODORE TRAPP, individually and on
17 behalf of all others similarly situated

WESTERN CAB COMPANY,
LUCKY CAB COMPANY OF NEVADA,
ON DEMAND SEDAN SERVICES, LLC,
BLS LIMOUSINE SERVICES OF LAS
VEGAS, INC., DESERT CAB, INC. and SUN
CAB, INC

18 By: /s/ Jay Edelson
19 Jay Edelson (ARDC No. 6239287)
20 Rafey S. Balabanian (ARDC No. 6285687)
21 KAMBEREDELSON LLC
22 350 North LaSalle Street
23 Suite 1300
Chicago, Illinois 60654
Tel: 312.589.6370
Fax: 312.589.6378
Email: jedelson@kamberedelson.com
Email: rbalabanian@kamberedelson.com
Attorneys for Plaintiff

By: /s/ Jeffrey A. Bendavid
Jeffrey A. Bendavid (Nevada Bar No. 6220)
Moran Law Firm, LLC
630 South 4th Street
Las Vegas, Nevada 89101
Tel: 702.384.8424
Email: j.bendavid@moranlawfirm.com
Attorneys for Defendants

1 Jay Edelson, Esq. (ARDC No. 6239287) (*Admitted Pro Hac Vice*)
Rafey Balabanian, Esq. (ARDC No. 6285687) (*Admitted Pro Hac Vice*)
2 KAMBEREDELSON LLC
350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654
3 Tel: 312.589.6370
Fax: 312.589.6378
4 *Attorneys for Plaintiff*
THEODORE TRAPP and the putative class

5 Catherine A. Olendorff, Esq.
5225 West Post Road
6 Las Vegas, Nevada 89118
Tel: 702.873.8012
7 *Attorneys for Defendants*
NEVADA CHECKER CAB CORPORATION,
8 NEVADA STAR CAB CORPORATION, and
NEVADA YELLOW CAB CORPORATION

9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

11 THEODORE TRAPP, on his own behalf and
12 on behalf of all others similarly situated,

13 Plaintiff,

14 v.

15 BIG POPPA'S, LLC, a Nevada limited
liability company d/b/a BADDA BING
16 MEN'S CLUB, *et al.*,

17 Defendants.

Case No. 2:09-cv-00995

[PROPOSED]
JOINT STIPULATION OF DISMISSAL
WITHOUT PREJUDICE BETWEEN
PLAINTIFF AND DEFENDANTS
CHECKER CAB CORPORATION, STAR
CAB CORPORATION, AND YELLOW
CAB CORPORATION

Honorable Lloyd D. George

Magistrate Judge Peggy A. Leen

18 Plaintiff Theodore Trapp and Defendants Nevada Checker Cab Corporation, Nevada Star
19 Cab Corporation, and Nevada Yellow Cab Corporation, through their respective counsel,
20 pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, hereby stipulate and agree that
21 the above-captioned matter, including any and all claims asserted therein, shall be dismissed
22 without prejudice and with each Party to bear their own costs as to Defendants Nevada Checker
23 Cab Corporation, Nevada Star Cab Corporation, and Nevada Yellow Cab Corporation. The
24 Parties further stipulate and agree that nothing in this Stipulation shall operate to affect the status
of the other defendants in this matter.

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IT IS SO STIPULATED.

THEODORE TRAPP, individually and on behalf of all others similarly situated

NEVADA CHECKER CAB CORPORATION,
NEVADA STAR CAB CORPORATION,
NEVADA YELLOW CAB CORPORATION

By: /s/ Jay Edelson
Jay Edelson (ARDC No. 6239287)
Rafey S. Balabanian (ARDC No. 6285687)
KAMBEREDELSON LLC
350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654
Tel: 312.589.6370
Fax: 312.589.6378
Attorneys for Plaintiff

By: /s/ Catherine A. Olendorff
Catherine A. Olendorff, Esq.
5225 West Post Road
Las Vegas, Nevada 89118
Tel: 702.873.8012
Attorneys for Defendants

1 Jay Edelson, Esq. (ARDC No. 6239287) (*Admitted Pro Hac Vice*)
Rafey Balabanian, Esq. (ARDC No. 6285687) (*Admitted Pro Hac Vice*)
2 KAMBEREDELSON LLC
350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654
3 Tel: 312.589.6370
Fax: 312.589.6378
4 *Attorneys for Plaintiff*
THEODORE TRAPP and the putative class

5 Mark E. Trafton, Esq.
1900 Industrial Road
6 Las Vegas, Nevada 89102
7 Tel: 702.385.1813
Fax: 702.382.9633
8 *Attorneys for Defendant*
9 BELL TRANS A NEVADA CORPORATION
d/b/a BELL TRANS

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

12 THEODORE TRAPP, on his own behalf and
on behalf of all others similarly situated,

13 Plaintiff,

14 v.

15 BIG POPPA'S, LLC, a Nevada limited
16 liability company d/b/a BADDA BING
MEN'S CLUB, *et al.*,

17 Defendants.

Case No. 2:09-cv-00995

[PROPOSED]
JOINT STIPULATION OF DISMISSAL
WITHOUT PREJUDICE BETWEEN
PLAINTIFF AND DEFENDANT BELL
TRANS

Honorable Lloyd D. George

Magistrate Judge Peggy A. Leen

18
19 Plaintiff Theodore Trapp and Defendant Bell Trans a Nevada corporation d/b/a Bell
20 Trans, through their respective counsel, pursuant to Rule 41(a)(2) of the Federal Rules of Civil
21 Procedure, hereby stipulate and agree that the above-captioned matter, including any and all
22 claims asserted therein, shall be dismissed without prejudice and with each Party to bear their
23 own costs as to Defendant Bell Trans a Nevada corporation d/b/a Bell Trans. The Parties further
24 stipulate and agree that nothing in this Stipulation shall operate to affect the status of the other
defendants in this matter.

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IT IS SO STIPULATED.

THEODORE TRAPP, individually and on
behalf of all others similarly situated

BELL TRANS A NEVADA CORPORATION
d/b/a BELL TRANS

By: /s/ Rafey S. Balabanian
Rafey S. Balabanian (ARDC No. 6285687)
KAMBEREDELSON LLC
350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654
Tel: 312.589.6370
Fax: 312.589.6378
Attorneys for Plaintiff

By: /s/ Mark E. Trafton
1900 Industrial Road
Las Vegas, Nevada 89102
Tel: 702.385.1813
Fax: 702.382.9633
Attorneys for Defendants

1 Jay Edelson, Esq. (ARDC No. 6239287) (*Admitted Pro Hac Vice*)
Email: jedelson@kamberedelson.com
2 Rafey Balabanian, Esq. (ARDC No. 6285687) (*Admitted Pro Hac Vice*)
Email: rbalabanian@kamberedelson.com
3 KAMBEREDELSON LLC
350 North LaSalle Street
Suite 1300
4 Chicago, Illinois 60654
Tel: 312.589.6370
Fax: 312.589.6378
5 *Attorneys for Plaintiff*
6 THEODORE TRAPP and the putative class

7 Richard L. Tobler, Esq. (Nevada Bar No. 4070)
RICHARD L. TOBLER, LTD.
3654 North Rancho Drive
8 Suite 102
Las Vegas, Nevada 89130-3179
9 Tel: 702.256.6000
Attorneys for Defendant
10 MICHAEL SALTMAN d/b/a MINXX

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 v.

17 BIG POPPA 'S, LLC, a Nevada limited
liability company d/b/a BADDA BING
18 MEN'S CLUB, *et al.*,

19 Defendants.

Case No. 2:09-cv-00995

[PROPOSED]
STIPULATED REQUEST FOR
DISMISSAL OF THE COMPLAINT
WITHOUT PREJUDICE AS TO
DEFENDANT MICHAEL SALTMAN
d/b/a MINXX

Honorable Lloyd D. George

Magistrate Judge Peggy A. Leen

20 Plaintiff Theodore Trapp ("Plaintiff" or "Trapp") and Michael Saltman d/b/a Minxx
21 ("Saltman") propose the following Stipulation and Proposed Order dismissing the Complaint
22 without prejudice and with each party to bear their own costs as to Saltman only. In support, the
Parties state as follows:

23 **WHEREAS**, on July 8, 2009, Plaintiff filed a four-count putative class action complaint
24 ("the Complaint") against the Defendants alleging violations of Nevada's Racketeering Statute;

1 **WHEREAS**, Plaintiff caused a copy of the summons and complaint in this matter to be
2 served on Saltman on July 10, 2009;

3 **WHEREAS**, on July 29, 2009, Saltman moved the Court pursuant to Rules 12(b)(6) and
4 56 of the Federal Rules of Civil Procedure for dismissal of the Complaint as against Saltman
5 (“the Motion to Dismiss”);

6 **WHEREAS**, Saltman attached an affidavit to his Motion to Dismiss attesting that
7 Saltman has never held any interest in Minxx in his individual or personal capacity, has never
8 done business as Minxx, and has never created any entities for the undertaking of the operation
9 of Minxx;

10 **WHEREAS**, in his affidavit, Saltman further attests that Minxx has been closed since
11 mid-June 2008, and that neither Saltman, nor the current record owner of Minxx, SC
12 Entertainment #2, LLC, has any current intentions of reopening and operating Minxx;

13 **WHEREAS**, Plaintiff has therefore been advised that Saltman was improperly named as
14 a party-defendant in this case because he has never held any interest in Minxx in his individual
15 or personal capacity, has never done business as Minxx, and has never created any entities for
16 the undertaking of the operation of Minxx;

17 **WHEREAS**, Plaintiff has advised Saltman that without waiving and expressly reserving
18 his right to name at a later time Saltman a party-defendant should Plaintiff have a good-faith
19 basis to do so, Plaintiff agrees to dismiss the Complaint without prejudice as to Saltman only;

20 **WHEREAS**, Saltman has advised Plaintiff that he will not object on the basis of this
21 stipulation or the dismissal contemplated hereby to any later attempt by Plaintiff to name
22 Saltman as a party-defendant in this matter, so long as good faith cause exists to so amend the
23 pleadings.

24 **NOW THEREFORE**, the Parties, through their counsel of record, hereby **STIPULATE**
and **AGREE** as follows:

1. This stipulation does not constitute a waiver of, or otherwise impair, Plaintiff’s
right to name at a later time Michael Saltman d/b/a Minxx as a party-defendant should Plaintiff
have a good-faith basis to so name Michael Saltman d/b/a Minxx as a party-defendant.

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2. Plaintiff's Complaint is hereby dismissed without prejudice as to Michael Saltman d/b/a Minxx with each party to bear their own costs.

3. This stipulation does not constitute a waiver of, or otherwise impair, any defenses Defendant Michael Saltman d/b/a Minxx may raise against this action.

4. Nothing in this Stipulation shall operate to affect the status of the other defendants in this matter.

IT IS SO STIPULATED.

THEODORE TRAPP, individually and on behalf of all others similarly situated

MICHAEL SALTMAN d/b/a MINXX

By: /s/ Rafey S. Balabanian
Rafey S. Balabanian (ARDC No. 6285687)
KAMBEREDELSON LLC
350 North LaSalle Street
Suite 1300
Chicago, Illinois 60654
Tel: 312.589.6370
Fax: 312.589.6378
Email: rbalabanian@kamberedelson.com
Attorneys for Plaintiff

By: /s/ Richard L. Tobler
Richard L. Tobler (Nevada Bar No. 4070)
RICHARD L. TOBLER, LTD.
3654 North Rancho Drive
Suite 102
Las Vegas, Nevada 89130-3179
Tel: 702.256.6000
Email: rltldck@hotmail.com
Attorneys for Defendant