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Nevada Bar No. 002360
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Attorney for Defendants
5 DEJA VU SHOWGIRLS OF LAS VEGAS, LLC
LITTLE DARLINGS OF LAS VEGAS, LLC
6 LAS VEGAS ENTERTAINMENT, LLC

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF, NEVADA**

10
11 THEODORE TRAPP, on his own behalf and
on behalf of all others similarly situated,

12
13 Plaintiff,

14 vs.

15 BIG POPPA'S, LLC, a Nevada limited
liability company d/b/a BADDA
16 BINGMEN'S CLUB; SKY TOP VENDING,
INC., a Nevada Corporation d/b/a CAN CAN
17 ROOM; LA FUENTE, INC., a Nevada
18 corporation d/b/a CHEETAH'S; C.P. FOOD
AND BEVERAGE, INC., a Nevada
19 corporation d/b/a CLUB PARADISE; DEJA
VU SHOWGIRLS OF LAS VEGAS, LLC, a
20 Nevada limited liability company d/b/a DEJA
VU SHOWGIRLS; PALOMINO CLUB,
21 INC., a Nevada corporation d/b/a
PALOMINO CLUB; SHAC, LLC, a Nevada
22 limited liability company d/b/a SAPPHIRE;
d/b/a STAR CAB COMPANY; K-KEL,
23 INC., a Nevada corporation d/b/a
SPEARMINT RHINO; D. 2801
24 WESTWOOD, INC., a Nevada corporation
d/b/a TREASURES; LITTLE DARLINGS
25 OF LAS VEGAS, LLC, a Nevada limited
26 liability company d/b/a LITTLE DARLINGS;
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13 CASE NO. 2:09-cv-00995

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15 **DEFENDANTS DEJA VU SHOWGIRLS**
OF LAS VEGAS, LLC, LITTLE
DARLINGS OF LAS VEGAS, LLC'S,
AND LAS VEGAS ENTERTAINMENT,
LLC D/B/A LARRY FLYNT'S HUSTLER
CLUB'S DEMAND FOR SECURITY OF
COSTS

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

1 **DEFENDANTS DEJA VU SHOWGIRLS OF LAS VEGAS, LLC, LITTLE**
2 **DARLINGS OF LAS VEGAS, LLC'S, AND LAS VEGAS ENTERTAINMENT, LLC**
3 **D/B/A LARRY FLYNT'S HUSTLER CLUB'S DEMAND FOR SECURITY OF COSTS**

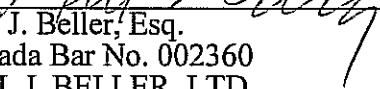
4 TO: THEODORE TRAPP, Plaintiff, and

5 TO: JAY EDELSON, ESQ., RAFEY BALABANIAN, ESQ., JAMES SMYTH, ESQ., his
6 attorneys.

7 Pursuant to NRS 18.130, Defendants Deja Vu Showgirls of Las Vegas, LLC, Little
8 Darlings of Las Vegas, LLC and Las Vegas Entertainment, LLC hereby makes demand upon
9 Plaintiff, who resides out of State, for security in the amount of Five Hundred Dollars (\$500.00)
10 for costs and charges which may be awarded against Plaintiff.

11 The requirements of NRS 18.130 apply to actions in the United States District Court,
12 District of Nevada. See, Truck Ins. Exchange v. Tetzlaff, 685 F.Supp.223, 227 (D.Nev. 1988).

13 Dated this 29 day of June, 2009.

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25 LAS VEGAS ENTERTAINMENT, LLC
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of the law firm of NEIL J. BELLER, LTD. and on
3 the 29 of June, 2009, service of the foregoing **DEFENDANTS DEJA VU SHOWGIRLS OF**
4 **LAS VEGAS, LLC, LITTLE DARLINGS OF LAS VEGAS, LLC'S, AND LAS VEGAS**
5 **ENTERTAINMENT, LLC D/B/A LARRY FLYNT'S HUSTLER CLUB'S DEMAND FOR**
6 **SECURITY OF COSTS** was made, by depositing a true and correct copy of the same in the
7 United States mail, postage prepaid, addressed to the following:

8 James E. Smyth, Esq.
9 Bar No. 6506
10 3800 Howard Hughes Parkway, Seventh Floor
11 Las Vegas, NV 89169
12 (702) 792-7000

11 Jay Edelson, Esq.
12 Rafey Balabanian, Esq.
13 KAMBER EDELSON, LLC
14 350 North LaSalle Street, Suite 1300
15 Chicago, Illinois 60654

16 Attorneys for Plaintiff THEODORE TRAPP

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An Employee of Neil J. Beller, Ltd.