

Snell & Wilmer
LLP
LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
702.784.5200

1 Robin E. Perkins, Esq.
Nevada Bar No. 9891
2 SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
3 Las Vegas, NV 89169
Telephone: (702) 784-5200
4 Facsimile: (702) 784-5252
rperkins@swlaw.com

5
6 Leon F. Mead II, Esq.
Nevada Bar No. 5719
MEAD LAW GROUP
7 1509 Saintsbury Drive
Las Vegas, NV 89144
8 Telephone: (702) 869-0192
Facsimile: (702) 922-3831
9 leon@meadlawgroup.com

10 *Attorneys for Jaynes Corporation and*
11 *Western Surety Company*

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14
15 United States of America for the use and
16 benefit of ARMADA CONCRETE, LLC, a
Nevada limited liability company,

17 Plaintiff,

18 vs.

19 JAYNES CORPORATION, a New Mexico
20 corporation; and WESTERN SURETY
COMPANY, a South Dakota corporation and
21 surety authorized to do business in Nevada,
Payment Bond No. 929532918,

22 Defendants.

Case No. 2:14-cv-02176-GMN-GWF

**JAYNES CORPORATION AND
WESTERN SURETY COMPANY'S
MOTION TO APPEAR
TELEPHONICALLY AT CALENDAR
CALL**

23 AND RELATED ACTIONS.
24

25
26 **MEMORANDUM OF POINTS AND AUTHORITIES**

27 Defendants Jaynes Corporation and Western Surety Company (collectively "Jaynes")
28 submit this Motion to Appear Telephonically at the Calendar Call in this matter scheduled for

1 May 2, 2017 at 9:00 a.m. Co-Counsel Robin E. Perkins, Snell & Wilmer, will be out of state at
2 the time of the Calendar Call due to a previously scheduled work engagement on another matter.
3 Co-Counsel Leon F. Mead II, Mead Law Group, will be out of state due to a previously scheduled
4 personal obligation.

5 Accordingly, Jaynes requests that this Court grant its Motion for Counsel Robin E. Perkins
6 to appear on behalf of Jaynes and Co-Counsel Leon F. Mead II telephonically at the Calendar Call
7 in this matter scheduled for May 2, 2017 at 9:00 a.m.

8
9 Dated: March 24, 2017

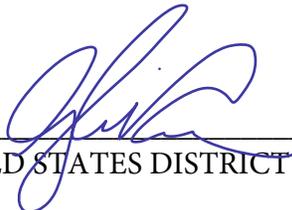
SNELL & WILMER L.L.P.

10
11 By: /s/ Robin E. Perkins

12 Robin E. Perkins, Esq.
13 Nevada Bar No. 9891
14 3883 Howard Hughes Parkway
15 Suite 1100
16 Las Vegas, Nevada 89169

17 *Attorneys for Jaynes Corporation and*
18 *Western Surety Company*

19 **It is so ordered.**

20
21 
22 _____
23 UNITED STATES DISTRICT COURT JUDGE

24 **DATED** this 27 day of March, 2017.

Snell & Wilmer
LLP
LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
702.784.5200

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **JAYNES CORPORATION AND WESTERN SURETY COMPANY'S MOTION TO APPEAR TELEPHONICALLY AT CALENDAR CALL** by the method indicated:

- U.S. Mail
- U.S. Certified Mail
- Facsimile Transmission
- Overnight Mail
- Federal Express
- Hand Delivery
- Electronic Filing/ECF
- E-mail

and addressed to the following:

Robert E. Schumacher, Esq.
Jon M. Ludwig, Esq.
GORDON & REES LLP
3770 Howard Hughes Parkway, Suite 100
Las Vegas, NV 89160
*Attorneys for Use Plaintiff Armada
Concrete LLC and Third Party Defendant
Liberty Mutual Insurance Co.
(via Electronic Filing)*

John H. Donboli, Esq.
DONBOLI LAW GROUP
11682 El Camino Real, Suite 100
San Diego, CA 92130
*Attorneys for Use Plaintiff Armada
Concrete LLC and Defendant Liberty
Mutual Insurance Co.
(via U.S. Mail)*

DATED: March 24, 2017

/s/ Maricris Williams
An Employee of Snell & Wilmer L.L.P.