

1 Laura K. Granier, Esq. (NSB 7357)
2 laura.granier@dgsllaw.com
3 50 W. Liberty Street, Suite 950
4 Reno, Nevada 89501
5 (775) 229-4219 (Telephone)
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7 *Attorney for Plaintiffs*

8 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
9 IN AND FOR CARSON CITY

10 DAVID & CARLY HELD individually and
11 on behalf of their minor child N.H.;
12 VERONICA BERRY individually and on
13 behalf of her minor child J.B.; RED AND
14 SHEILA FLORES individually and on behalf
15 of their minor child C.F.; JAOUAD AND
16 NAIMI BENJELLOUN, individually and on
17 behalf of their minor children N.B.1, N.B.2,
18 and N.B.3; KIMBERLY AND CHARLES
19 KING individually and on behalf of their
20 minor children L.K.1 and L.K.2; NEVADA
21 CONNECTIONS ACADEMY,

22 Plaintiffs,

23 v.

24 STATE OF NEVADA, ex rel. STATE
25 PUBLIC CHARTER SCHOOL
26 AUTHORITY, a political subdivision of the
27 State of Nevada, and PATRICK GAVIN, in
28 his official capacity as Director of the State
Public Charter School Authority,

Defendants.

Case No. 16 OC 00249 1B

Dept. No. I

MOTION FOR LEAVE TO CONDUCT LIMITED PREHEARING DISCOVERY

Plaintiffs, David & Carly Held individually and on behalf of their minor child N.H.;
Veronica Berry individually and on behalf of her minor child J.B.; Red and Sheila Flores
individually and on behalf of their minor child C.F.; Jaouad and Naimi Benjelloun, individually
and on behalf of their minor children N.B.1, N.B.2, and N.B.3; Kimberly and Charles King

1 individually and on behalf of their minor children L.K.1 and L.K.2; and Nevada Connections
2 Academy (“NCA” and collectively “Plaintiffs”), by and through their undersigned counsel,
3 Davis Graham & Stubbs LLP, hereby move this Court for an order allowing the parties to
4 conduct limited prehearing discovery in this matter. This motion is made in good faith and based
5 upon the following Memorandum of Points and Authorities and all papers and pleadings filed in
6 this action.

7 MEMORANDUM OF POINTS AND AUTHORITIES

8 I. INTRODUCTION

9 Plaintiffs filed a Motion for Temporary Restraining Order/Preliminary Injunction on
10 November 2, 2016. On November 15, 2016, the Court scheduled two hours on November 30,
11 2016 for the hearing on Plaintiff’s Motion. The parties have two weeks to prepare for hearing
12 and a limited time for the hearing itself.

13 In order to prepare for hearing and streamline the hearing process, Plaintiffs request leave
14 of Court to conduct limited prehearing discovery. This also is important for Plaintiffs to prepare
15 for the hearing and meet their burden of demonstrating a likelihood of success on the merits,
16 irreparable harm, that an injunction is in the public interest and advances public policy, and
17 alternatively, that Plaintiffs are entitled to writ relief.

18 On November 15, 2016, Plaintiffs’ counsel contacted Defendants’ counsel about
19 scheduling depositions in preparation for the evidentiary hearing on November 30. *See Exhibits*
20 **1 (Granier Declaration) and 2 (Email)**. Plaintiffs proposed taking four depositions and requested
21 dates and times that counsel and the witnesses would be available, and noted that they would
22 coordinate with Defendants’ counsel to schedule any depositions they wished to take. *Id.*

23 Defendants’ counsel requested that Plaintiffs put their position regarding depositions into
24 writing, and Plaintiffs’ counsel followed up immediately with an email stating the following
25 reasons for requesting prehearing discovery:

26 As you know, we are scheduled for an evidentiary hearing where we will
27 be required to show (i) likelihood of success on the merits; (ii) irreparable
28 harm; and (iii) the public interest all favor our requested injunction. We
anticipate that in order to prepare for the hearing and hopefully make the
hearing more efficient we need limited pre-hearing discovery on several

1 issues. As we discussed, these issues include but are not limited to the
2 following:

3 -- the Authority's unequal application/enforcement of statutes and
4 regulations

5 -- the NDE's position with respect to the graduation rate issue
6 under SB 509

7 -- the Authority's action to investigate or take any action relative to
8 Nevada Virtual Academy's refusal to enroll certain high school
9 students based on their credit deficiency – which also relates to
10 unequal enforcement

11 -- the Authority's commencement of rulemaking on charter
12 amendments and closure proceedings in Jan. 2016, board member's
13 concerns about proceeding without such regulations, and reasons for
14 the Authority waiting until last month to proceed with the rulemaking

15 -- the Authority's and NDE's factual support for identifying
16 appointment of a receiver and reconstitution as a cure or solution to the
17 graduation rate issue

18 -- the Authority's and NDE's factual support for insisting NCA
19 waive certain rights for judicial review

20 -- the Authority's factual support and explanation for not following
21 the State Performance Framework

22 As you know, we have made certain public records requests on some of
23 these topics and the Authority's responses have provided little information
24 which indicates to us that perhaps more of the information is available
25 through testimony regarding discussions that occurred and perhaps were
26 never documented.

27 As we discussed, these are just bullet points for the purpose of meeting
28 and conferring and do not represent an exhaustive list of why we need this
discovery. As we also discussed, the depositions should make the hearing
more efficient and potentially avoid the need for some of these witnesses
to testify at the hearing if we can use deposition transcripts or we learn
their testimony is not material to the requested relief.

Please let me know your thoughts on this and if we have a need for the
Court to make a decision on this pre-hearing discovery let's discuss a
proposed briefing schedule that allows for such a decision or request a
telephonic conference with the Court as soon as possible to address this.

25 *Id.* As of the time of this writing, Plaintiffs have not heard back from Defendants'
26 counsel regarding their request to take these limited depositions.

27 II. ARGUMENT

28 NRCP Rule 30(a)(2) states in pertinent part:

1 A party must obtain leave of court, which shall be granted to the extent consistent
2 with the principles stated in Rule 26(b)(2), if the person to be examined is
3 confined in prison or if, without the written stipulation of the parties:

4 * * *

5 (B) a party seeks to take a deposition before the time specified in Rule 26(a),
6 unless the notice contains a certification, with supporting facts, that the person to
7 be examined is expected to leave the state and be unavailable for examination in
8 this state unless deposed before that time.

9 Under Rule 26(a), parties generally are not allowed to conduct discovery until after the
10 filing of case conference report(s). Given the expedited nature of the Motion for Temporary
11 Restraining Order/Preliminary Injunction, it is not possible to wait until after the requirements of
12 Rule 26(a) are fulfilled before conducting discovery. Plaintiffs attempted to obtain some of the
13 information they needed to prepare for the hearing by serving four public record requests on the
14 State Public Charter School Authority. While the Authority turned over many documents
15 pursuant to the public records requests, Plaintiffs believe much of the information they seek has
16 not been provided in those responses and, therefore, is related to verbal communications and
17 must be obtained by deposition. Plaintiffs also seek to serve Subpoenas Duces Tecum on the
18 deponents as they believe that some of the deponents may possess records that were not
19 encompassed by the scope of the public records requests.

20 Plaintiffs seek to conduct very limited discovery prior to the hearing. Plaintiffs served
21 deposition notices for four depositions to be conducted on November 22, 23 and 29 (having
22 expressed a willingness to work with the State and the witnesses if these dates and times require
23 adjustment) and will be serving the deponents with a Subpoena or Subpoena Duces Tecum. *See*
24 **Exhibit 3**. Plaintiffs anticipate that all but one of the depositions they have noticed will take less
25 than a full day. Plaintiffs have also stated that they will work with Defendants to schedule any
26 depositions they may wish to conduct prior to the hearing. Taking these depositions prior to the
27 hearing should make the hearing more efficient and potentially avoid the need for some of these
28 witnesses to testify at the hearing if the parties use the deposition transcripts in lieu of an
appearance, or if the parties learn that the witness's testimony is not material to the requested

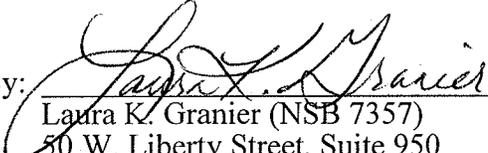
1 relief.

2 **III. CONCLUSION**

3 For the foregoing reasons, Plaintiffs request that this Court enter an Order granting the
4 Motion for Prehearing Discovery.

5 Respectfully submitted this 16th day of November, 2016.

6 DAVIS GRAHAM & STUBBS LLP

7
8 By: 
9 Laura K. Granier (NSB 7357)
10 50 W. Liberty Street, Suite 950
11 Reno, Nevada 89501
12 (775) 229-4219 (Telephone)
13 (775) 403-2187 (Fax)

14 *Attorneys for Plaintiffs*

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CERTIFICATE OF SERVICE

Pursuant to N.R.C.P. 5(b), I certify that I am an employee of Davis Graham & Stubbs LLP and not a party to, nor interested in, the within action; that on November 16, 2016, a true and correct copy of the foregoing document was enclosed in a sealed envelope, and served as listed below:

Gregory D. Ott, Esq.
Deputy Attorney General
100 N. Carson Street
Carson City, NV 89701

Attorneys for Defendants

VIA HAND DELIVERY AND EMAIL

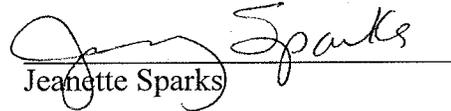

Jeanette Sparks

EXHIBIT 1

Declaration of L. Granier

EXHIBIT 1

Declaration of L. Granier

1 Laura K. Granier, Esq. (NSB 7357)
2 laura.granier@dgsllaw.com
3 50 W. Liberty Street, Suite 950
4 Reno, Nevada 89501
5 (775) 229-4219 (Telephone)
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7 *Attorney for Plaintiffs*

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IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR CARSON CITY

DAVID & CARLY HELD individually and on behalf of their minor child N.H.; VERONICA BERRY individually and on behalf of her minor child J.B.; RED AND SHEILA FLORES individually and on behalf of their minor child C.F.; JAOUAD AND NAIMI BENJELLOUN, individually and on behalf of their minor children N.B.1, N.B.2, and N.B.3; KIMBERLY AND CHARLES KING individually and on behalf of their minor children L.K.1 and L.K.2; NEVADA CONNECTIONS ACADEMY,

Plaintiffs,

v.

STATE OF NEVADA, ex rel. STATE PUBLIC CHARTER SCHOOL AUTHORITY, a political subdivision of the State of Nevada, and PATRICK GAVIN, in his official capacity as Director of the State Public Charter School Authority,

Defendants.

Case No. 16 OC 00249 1B

Dept. No. I

DECLARATION OF LAURA K. GRANIER IN SUPPORT OF MOTION FOR LEAVE TO CONDUCT LIMITED PREHEARING DISCOVERY

I, Laura K. Granier, do certify under penalty of perjury as follows:

1. I am a partner with the law firm of Davis Graham & Stubbs LLP, counsel for Plaintiffs. I have personal knowledge of the facts stated herein, and if called upon to testify as to the matters set forth herein, I would be competent to do so. I make this declaration in support of

1 the Plaintiffs' Motion for Leave to Conduct Limited Prehearing Discovery ("Motion").

2 2. Attached to the Motion as Exhibit 2 is a true and correct copy of an email
3 exchange I had with counsel for Defendants on November 15, 2016 regarding prehearing
4 discovery.

5 3. I discussed this matter with Mr. Ott by telephone yesterday after I sent the email
6 that is attached as Exhibit 2. During that discussion he indicated that he would get back to me
7 about whether the State would agree to the requested depositions. As of the time of this filing, I
8 have not received any response from Mr. Ott.

9 4. Attached to the Motion as Exhibit 3 is a true and correct copy of an email I sent to
10 Defendants' counsel on November 15, 2016 transmitting copies of four deposition notices.

11 I declare under penalty of perjury under the laws of the State of Nevada that the
12 foregoing is true and corrected and was executed this 16th day of November, 2016, in Reno,
13 Nevada.
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LAURA K. GRANIER

EXHIBIT 2

**11/15/2016 Email to G. Ott regarding
need for depos**

EXHIBIT 2

**11/15/2016 Email to G. Ott regarding
need for depos**

Sparks, Jenny

From: Granier, Laura
Sent: Tuesday, November 15, 2016 11:22 AM
To: 'Greg D. Ott'
Cc: Marissa M. Houk; Sparks, Jenny
Subject: RE: Meet and Confer - Request to Consolidate Actions

Greg,

Thank you for agreeing to stipulate on consolidation. We're preparing the draft stipulation now and will have it over to you shortly.

With respect to your question about the depositions, I provide you the following in order to meet and confer.

As you know, we are scheduled for an evidentiary hearing where we will be required to show (i) likelihood of success on the merits; (ii) irreparable harm; and (iii) the public interest all favor our requested injunction. We anticipate that in order to prepare for the hearing and hopefully make the hearing more efficient we need limited pre-hearing discovery on several issues. As we discussed, these issues include but are not limited to the following:

- the Authority's unequal application/enforcement of statutes and regulations
- the NDE's position with respect to the graduation rate issue under SB 509
- the Authority's action to investigate or take any action relative to NVA's refusal to enroll certain high school students based on their credit deficiency – which also relates to unequal enforcement
- The Authority's commencement of rulemaking on charter amendments and closure proceedings in Jan. 2016, board member's concerns about proceeding without such regulations, and reasons for the Authority waiting until last month to proceed with the rulemaking
- the Authority's and NDE's factual support for identifying appointment of a receiver and reconstitution as a cure or solution to the graduation rate issue
- the Authority's and NDE's factual support for insisting NCA waive certain rights for judicial review
- the Authority's factual support and explanation for not following the State Performance Framework

As you know, we have made certain public records requests on some of these topics and the Authority's responses have provided little information which indicates to us that perhaps more of the information is available through testimony regarding discussions that occurred and perhaps were never documented.

As we discussed, these are just bullet points for the purpose of meeting and conferring and do not represent an exhaustive list of why we need this discovery. As we also discussed, the depositions should make the hearing more efficient and potentially avoid the need for some of these witnesses to testify at the hearing if we can use deposition transcripts or we learn their testimony is not material to the requested relief.

Please let me know your thoughts on this and if we have a need for the Court to make a decision on this pre-hearing discovery let's discuss a proposed briefing schedule that allows for such a decision or request a telephonic conference with the Court as soon as possible to address this.

Thank you,
Laura

LAURA K. GRANIER ▪ Partner

P: 775.473.4513 ▪ F: 775.403.2187 ▪ C: 775.750.9295 ▪ [vcard](#)

Davis Graham & Stubbs LLP
50 W. Liberty Street, Suite 950 ▪ Reno, NV 89501

From: Greg D. Ott [mailto:Gott@ag.nv.gov]
Sent: Tuesday, November 15, 2016 11:08 AM
To: Granier, Laura
Cc: Marissa M. Houk
Subject: RE: Meet and Confer - Request to Consolidate Actions

Laura,
Following up on our conversation, I'll stipulate to consolidate the first action into the second action with the understanding that you will amend the complaint so that we are governed by one complaint and not two. You will prepare the stipulation.

Also you have agreed to put your position regarding the depositions into writing so that I can review with my team and respond as quickly as possible.

Thanks, Greg

From: Granier, Laura [mailto:Laura.Granier@dgslaw.com]
Sent: Tuesday, November 15, 2016 9:19 AM
To: Greg D. Ott
Subject: Meet and Confer - Request to Consolidate Actions

Greg,

As you know, NCA has filed two lawsuits in the First Judicial District against the Authority and its Director – Case No. 16 OC 194 1B and Case No. 16 OC 249 1B. I am writing to ask if Defendants will stipulate to consolidation of the two actions. We believe it makes sense to consolidate the actions and that consolidation would be beneficial to all parties and the Court.

Please let me know if you will agree and if so, I will prepare the Stipulation. If you will not agree, we will prepare and file a motion.

Thank you.

LAURA K. GRANIER ▪ Partner

P: 775.473.4513 ▪ F: 775.403.2187 ▪ C: 775.750.9295 ▪ [vcard](#)

Davis Graham & Stubbs LLP
50 W. Liberty Street, Suite 950 ▪ Reno, NV 89501

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distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

EXHIBIT 3

**11/15/2016 Email to G. Ott transmitting
depo notices**

EXHIBIT 3

**11/15/2016 Email to G. Ott transmitting
depo notices**

Sparks, Jenny

From: Sparks, Jenny
Sent: Tuesday, November 15, 2016 3:45 PM
To: 'gott@ag.nv.gov'
Cc: Granier, Laura
Subject: Held, et al. vs. State of Nevada, et al.
Attachments: 2016-11-15 Depo Notice - Patrick Gavin [11-22-2016 9_00 AM].pdf; 2016-11-15 Depo Notice - Adam Johnson [11-23-2016 9_30 AM].pdf; 2016-11-15 Depo Notice - Steve Canavero [11-29-2016 8_30 AM].pdf; 2016-11-15 Depo Notice - Kathleen Conaboy [11-29-2016 1_30 PM].pdf

Mr. Ott,

Attached please find deposition notices for Patrick Gavin, Adam Johnson, Steve Canavero and Kathleen Conaboy. A hard copy will follow by U.S. mail. Please let me know as soon as possible if you will accept service of subpoenas on behalf of the deponents.

Laura has set the depositions for November 22, 23 and 29. (We will take the deposition of Mr. Johnson in Las Vegas and will serve an amended deposition notice once we have secured a location.) Please let us know if the dates and times we have selected work for the deponents; if not, we will try to accommodate any requested changes but given the holidays and the impending hearing, there are very few dates that are available.

~ Jenny

JENNY SPARKS ▪ Legal Administrative Assistant to Laura K. Granier, Esq.

P: 775.473.4515 ▪ F: 775.403.2187 ▪ [vcard](#)

Davis Graham & Stubbs LLP
50 W. Liberty Street, Suite 950 ▪ Reno, NV 89501

1 Laura K. Granier, Esq. (NSB 7357)
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3 50 W. Liberty Street, Suite 950
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7 *Attorneys for Plaintiffs*

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IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR CARSON CITY

DAVID & CARLY HELD individually and
on behalf of their minor child N.H.;
VERONICA BERRY individually and on
behalf of her minor child J.B.; RED AND
SHEILA FLORES individually and on behalf
of their minor child C.F.; JAOUAD AND
NAIMI BENJELLOUN, individually and on
behalf of their minor children N.B.1, N.B.2,
and N.B.3; KIMBERLY AND CHARLES
KING individually and on behalf of their
minor children L.K.1 and L.K.2; NEVADA
CONNECTIONS ACADEMY,

Plaintiffs,

v.

STATE OF NEVADA, ex rel. STATE
PUBLIC CHARTER SCHOOL
AUTHORITY, a political subdivision of the
State of Nevada, and PATRICK GAVIN, in
his official capacity as Director of the State
Public Charter School Authority,

Defendants.

Case No. 16 OC 00249 1B

Dept. No. I

NOTICE OF DEPOSITION – PATRICK GAVIN

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

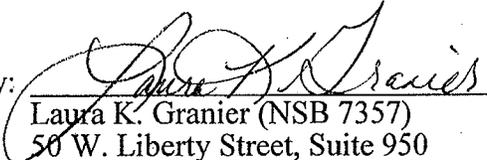
PLEASE TAKE NOTICE that at 9:00 a.m. on the 22nd day of November, 2016,

Plaintiffs, pursuant to NRCP 30, will take the deposition of **Patrick Gavin** at the law offices of
Davis Graham & Stubbs LLP, 50 West Liberty Street, Suite 950, Reno, NV 89501.

1 The deposition will be taken upon oral examination before a certified court reporter or
2 other officer authorized by the court to administer oaths. The oral examination will continue
3 from day to day until completed.

4 Respectfully submitted this 15th day of November, 2016.

5 DAVIS GRAHAM & STUBBS LLP

6
7 By: 
8 Laura K. Granier (NSB 7357)
9 50 W. Liberty Street, Suite 950
10 Reno, Nevada 89501
11 (775) 229-4219 (Telephone)
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13 *Attorneys for Plaintiffs*

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CERTIFICATE OF SERVICE

Pursuant to N.R.C.P. 5(b), I certify that I am an employee of Davis Graham & Stubbs LLP and not a party to, nor interested in, the within action; that on November 15, 2016, a true and correct copy of the foregoing document was enclosed in a sealed envelope, and served as listed below:

Gregory D. Ott, Esq.
Deputy Attorney General
100 N. Carson Street
Carson City, NV 89701

VIA U.S. MAIL AND EMAIL

Attorneys for Defendants


Jeanette Sparks

1 Laura K. Granier, Esq. (NSB 7357)
2 *laura.granier@dgsllaw.com*
3 50 W. Liberty Street, Suite 950
4 Reno, Nevada 89501
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7 *Attorneys for Plaintiffs*

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IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR CARSON CITY

DAVID & CARLY HELD individually and
on behalf of their minor child N.H.;
VERONICA BERRY individually and on
behalf of her minor child J.B.; RED AND
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of their minor child C.F.; JAOUAD AND
NAIMI BENJELLOUN, individually and on
behalf of their minor children N.B.1, N.B.2,
and N.B.3; KIMBERLY AND CHARLES
KING individually and on behalf of their
minor children L.K.1 and L.K.2; NEVADA
CONNECTIONS ACADEMY,

Plaintiffs,

v.

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PUBLIC CHARTER SCHOOL
AUTHORITY, a political subdivision of the
State of Nevada, and PATRICK GAVIN, in
his official capacity as Director of the State
Public Charter School Authority,

Defendants.

Case No. 16 OC 00249 1B

Dept. No. I

NOTICE OF DEPOSITION – ADAM JOHNSON

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that at 9:30 a.m. on the 23rd day of November, 2016,
Plaintiffs, pursuant to NRCP 30, will take the deposition of Adam Johnson at the law offices of
Davis Graham & Stubbs LLP, 50 West Liberty Street, Suite 950, Reno, NV 89501.

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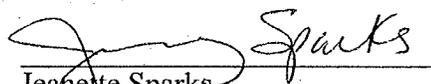
CERTIFICATE OF SERVICE

Pursuant to N.R.C.P. 5(b), I certify that I am an employee of Davis Graham & Stubbs LLP and not a party to, nor interested in, the within action; that on November 15, 2016, a true and correct copy of the foregoing document was enclosed in a sealed envelope, and served as listed below:

Gregory D. Ott, Esq.
Deputy Attorney General
100 N. Carson Street
Carson City, NV 89701

VIA U.S. MAIL AND EMAIL

Attorneys for Defendants


Jeanette Sparks

1 Laura K. Granier, Esq. (NSB 7357)
2 laura.granier@dgsllaw.com
3 50 W. Liberty Street, Suite 950
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7 *Attorneys for Plaintiffs*

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IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR CARSON CITY

DAVID & CARLY HELD individually and on behalf of their minor child N.H.; VERONICA BERRY individually and on behalf of her minor child J.B.; RED AND SHEILA FLORES individually and on behalf of their minor child C.F.; JAOUAD AND NAIMI BENJELLOUN, individually and on behalf of their minor children N.B.1, N.B.2, and N.B.3; KIMBERLY AND CHARLES KING individually and on behalf of their minor children L.K.1 and L.K.2; NEVADA CONNECTIONS ACADEMY,

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Defendants.

Case No. 16 OC 00249 1B

Dept. No. I

NOTICE OF DEPOSITION – STEVE CANAVERO

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

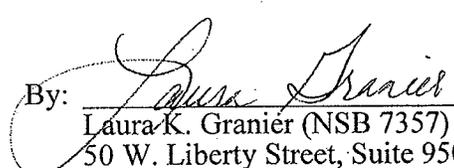
PLEASE TAKE NOTICE that at 8:30 a.m. on the 29th day of November, 2016,

Plaintiffs, pursuant to NRCP 30, will take the deposition of Steve Canavero at the law offices of Davis Graham & Stubbs LLP, 50 West Liberty Street, Suite 950, Reno, NV 89501.

1 The deposition will be taken upon oral examination before a certified court reporter or
2 other officer authorized by the court to administer oaths. The oral examination will continue
3 from day to day until completed.

4 Respectfully submitted this 15th day of November, 2016.

5 DAVIS GRAHAM & STUBBS LLP

6
7 By: 

8 Laura K. Granier (NSB 7357)
9 50 W. Liberty Street, Suite 950
10 Reno, Nevada 89501
11 (775) 229-4219 (Telephone)
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13 *Attorneys for Plaintiffs*

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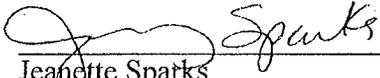
CERTIFICATE OF SERVICE

Pursuant to N.R.C.P. 5(b), I certify that I am an employee of Davis Graham & Stubbs LLP and not a party to, nor interested in, the within action; that on November 15, 2016, a true and correct copy of the foregoing document was enclosed in a sealed envelope, and served as listed below:

Gregory D. Ott, Esq.
Deputy Attorney General
100 N. Carson Street
Carson City, NV 89701

VIA U.S. MAIL AND EMAIL

Attorneys for Defendants



Jeanette Sparks

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5 (775) 229-4219 (Telephone)
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7 *Attorneys for Plaintiffs*

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IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR CARSON CITY

DAVID & CARLY HELD individually and on behalf of their minor child N.H.; VERONICA BERRY individually and on behalf of her minor child J.B.; RED AND SHEILA FLORES individually and on behalf of their minor child C.F.; JAOUAD AND NAIMI BENJELLOUN, individually and on behalf of their minor children N.B.1, N.B.2, and N.B.3; KIMBERLY AND CHARLES KING individually and on behalf of their minor children L.K.1 and L.K.2; NEVADA CONNECTIONS ACADEMY,

Plaintiffs,

v.

STATE OF NEVADA, ex rel. STATE PUBLIC CHARTER SCHOOL AUTHORITY, a political subdivision of the State of Nevada, and PATRICK GAVIN, in his official capacity as Director of the State Public Charter School Authority,

Defendants.

Case No. 16 OC 00249 1B

Dept. No. I

NOTICE OF DEPOSITION – KATHLEEN CONABOY

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that at **1:30 p.m. on the 29th day of November, 2016**, Plaintiffs, pursuant to NRCP 30, will take the deposition of **Kathleen Conaboy** at the law offices of Davis Graham & Stubbs LLP, 50 West Liberty Street, Suite 950, Reno, NV 89501.

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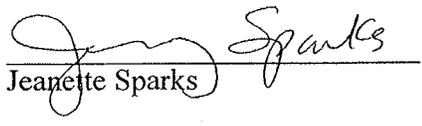
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