REC'D & FLET Laura K. Granier, Esq. (NSB 7357) 1 laura.granier@dgslaw.com 2016 NOV 29 AM 10: 58 2 50 W. Liberty Street, Suite 950 Reno, Nevada 89501 SUSAN MERRIVETHER 3 **V. Alegria^{CLERK}** (775) 229-4219 (Telephone) (775) 403-2187 (Fax) 4 Attorneys for Plaintiffs 5 6 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA 7 IN AND FOR CARSON CITY 8 9 Case No. 16 OC 00249 1B DAVID & CARLY HELD individually and on behalf of their minor child N.H.; 10 VERONICA BERRY individually and on Dept. No. I behalf of her minor child J.B.; RED AND 11 SHEILA FLORES individually and on behalf of their minor child C.F.; JAOUAD AND 12 NAIMI BENJELLOUN, individually and on behalf of their minor children N.B.1, N.B.2, 13 and N.B.3; KIMBERLY AND CHARLES KING individually and on behalf of their 14 minor children L.K.1 and L.K.2; NEVADA CONNECTIONS ACADEMY, 15 Plaintiffs, 16 17 v. STATE OF NEVADA, ex rel. STATE 18 SCHOOL PUBLIC CHARTER AUTHORITY, a political subdivision of the 19 State of Nevada, and PATRICK GAVIN, in his official capacity as Director of the State 20 Public Charter School Authority, 21 Defendants. 22 ERRATA TO COMPLAINT FOR DECLARATORY AND 23 INJUNCTIVE RELIEF, PETITION FOR JUDICIAL REVIEW, AND PETITION FOR WRIT OF MANDATE/REVIEW 24 (FILED OCTOBER 13, 2016) 25 Plaintiff Nevada Connections Academy ("NCA"), by and through its undersigned 26 counsel, Davis Graham & Stubbs LLP, hereby submits this Errata to its Complaint for 27 28

DAVIS GRAHAM & STUBBS LLP ATTORNEYS AT LAW W. LIBERTY ST., STE. 95 RENO, NEVADA 89501

1	Declaratory and Injunctive Relief, Petition for Judicial Review, and Petition for Writ of
2	Mandate/Review (filed on October 13, 2016) (hereinafter referred to as the "Complaint").
3	<u>ERRATA</u>
4	An affidavit was inadvertently not included with the Complaint. NCA respectfully
5	requests that the Court and the parties add the affidavit (attached hereto as Exhibit 1) to the end
6	of the Complaint.
7	m
8	Respectfully submitted this 200 day of November, 2016. DAVIS GRAHAM & STUBBS LLP
9	DAVIS GRAHAM & STOBBS LEI
10	By: Paula Leaneil
11 12	Laura K. Granier (NSB 7357) 30 W. Liberty Street, Suite 950
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EXHIBIT 1

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1	<u>VERIFICATION</u>
2	
3	STATE OF NEVADA) ss.
4	COUNTY OF WASHOE)
5	I, Steve Werlein, declare under penalty of perjury under the laws of the State of Nevada
6	that I am the authorized signatory for Nevada Connections Academy, Plaintiff in this action; that
7	I have read the foregoing Complaint for Declaratory and Injunctive Relief, Petition for Judicial
8	Review, and Petition for Writ of Mandate/Review and, specifically, the factual assertions
9	contained in Paragraphs 1-14, 16, and 20-58, and that the same are true of my own knowledge,
10	except as to the matters therein stated to be alleged upon information and belief, and as to those
11	
12	matters, I believe them to be true.
13	DATED this Aay of November, 2016.
14	
15	STEVE WERLEIN
16	S ILV Z V EACEM
17	Signed and sworn to before me this day of November, 2016. VICTORIA SILVA Notary Public - State of Nevada
18	this day of November, 2016. VICTORIA SILVA Notary Public - State of Nevada
19	Appt, NO. 13-9776-2
20	My App. Expires Jan. 10, 2021
21	NOTARY PUBLIC
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CERTIFICATE OF SERVICE

LLP and not a party to, nor interested in, the within action; that on November 29, 2016, a true

and correct copy of the foregoing document were enclosed in a sealed envelope, and served as

Pursuant to N.R.C.P. 5(b), I certify that I am an employee of Davis Graham & Stubbs

listed below:

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

Attorneys for Defendants

VIA U.S. MAIL

Jeanette Sparks