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FILED
January 31, 2024
State of Nevada
E.M.R.B.
9:51 a.m.

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9
10 **BEFORE THE STATE OF NEVADA**
11
12 **GOVERNMENT EMPLOYEE-MANAGEMENT RELATIONS BOARD**

13 ASSOCIATION OF PROFESSIONAL-
14 TECHNICAL ADMINISTRATORS,

Case No.: 2024-001

15 Complainant,

Panel:

16 vs.

17 WASHOE COUNTY SCHOOL
18 DISTRICT,

19 Respondent.
20 _____/

21 **MOTION TO EXPEDITE HEARING**

22 **COMES NOW** Complainant ASSOCIATION OF PROFESSIONAL-TECHNICAL
23 ADMINISTRATORS, (“APTA”), by and through its undersigned attorney, hereby moves the
24 Board to immediately order and set a hearing for the next available dates pursuant to NRS
25 288.280.
26

27 **I. THE PARTIES**

28 The APTA is an employee organization as defined in N.R.S. 288.040. It is the
recognized bargaining unit for the school psychologists and technical administrators at the
District.

1 The WASHOE COUNTY SCHOOL DISTRICT, (“District”), is a local government
2 employer under NRS 288.060, a political subdivision of the State of Nevada which oversees
3 and supervises Washoe County School psychologists and technical administrators and is the
4 regulating authority with regard to policy.

5 MEMORANDUM OF POINTS AND AUTHORITIES

6 **II. INTRODUCTION**

7
8 On January 9, 2024, the District unilaterally, and without the permission of APTA,
9 withdrew recognition of APTA as the recognized bargaining unit for all APTA members.
10 Subsequent to this, the District recognized a rival employee organization, Washoe
11 Professional-Technical Administrators, (“WPTA”), as the recognized bargaining unit for
12 professional-technical, (“Pro-Tech”), employees, a portion of APTA membership, and
13 withdrew all labor organization recognition to include that for the school psychologists.
14

15 **II. LEGAL AUTHORITY**

16 NRS 288.110(2) states in part that “[e]xcept as otherwise provided in this subsection
17 and NRS 288.115, 288.280 and 288.625, the Board shall conduct a hearing within 180 days
18 after it decides to hear a complaint.”

19
20 NRS 288.280 provides that “[a]ny controversy concerning prohibited practices may be
21 submitted to the Board in the same manner and with the same effect as provided in NRS
22 288.110, except that **an alleged failure to provide information as provided by NRS 288.180**
23 **must be heard and determined by the Board as soon as possible after the complaint is**
24 **filed with the Board.”** (Emphasis added.)

25 **III. ARGUMENT**

26
27 On January 24, 2024, APTA sent a request for information to the District in which it
28 requested information it deems necessary for the negotiations process. (Ex. 1.) On January 26,

1 2024, the District responded and refused to provide the requested information. (Ex. 2.) In it's
2 response, the District objected to this request stating that "on January 9, 2024 the Washoe
3 County School District (District) withdrew recognition of APTA as the bargaining
4 representative for District employees. As such, the provisions of NRS 288.180 no longer apply
5 and we are not obligated to provide this information."
6

7 NRS 288.280 mandates that the Board hear a complaint regarding the failure to
8 provide information as soon as possible after the complaint is filed with the Board. In
9 accordance with this statute, APTA hereby moves the Board to schedule and hold a hearing
10 regarding this request for information, and by incorporation those issues brought to the Board
11 in its First Amended Complaint filed on January 30, 2024, under EMRB case number 2024-
12 001, and the defense raised by the District, in an expedited manner and as soon as possible to
13 address these egregious violations.
14

15 **IV. CONCLUSION**

16 Based on the foregoing, APTA respectfully requests the Board grant its Motion to
17 Expedite Hearing and order and set a hearing to decide the these matters on the next available
18 hearing dates.
19

20
21 DATED this 31st day of January, 2024.

22
23 /s/ Ronald J. Dreher
24 Ronald J. Dreher
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CERTIFICATE OF SERVICE

Pursuant to NAC 288.070, the undersigned hereby certifies that I am the counsel for the Association of Professional-Technical Administrators and that on this date I served a true and correct copy of the preceding document addressed to the following:

Neil A Rombardo, Esq.
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Kevin Pick, Esq.
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Sara K. Montalva, Esq.
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by electronic service by transmitting the copy electronically as an attachment to electronic mail in portable document format.

DATED this 31st day of January, 2024.

/s/ Ronald J. Dreher
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CERTIFICATE OF SERVICE

Pursuant to NAC 288.070, the undersigned hereby certifies that I am the counsel for the Association of Professional-Technical Administrators and that on this date I served a true and correct copy of the preceding document addressed to the following:

Bruce Snyder, Esq.
Commissioner, EMRB
3300 W. Sahara Avenue
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Las Vegas, NV 89102
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by electronic service by transmitting the copy electronically as an attachment to electronic mail in portable document format.

DATED this 31st day of January, 2024.

/s/ Ronald J. Dreher
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5 Reno, Nevada 89511
Telephone: (775) 785-0088

6 *Attorneys for Respondent*
7 *Washoe County School District*

8
9 **BEFORE THE STATE OF NEVADA**
10 **GOVERNMENT EMPLOYEE-MANAGEMENT RELATIONS BOARD**

11 ASSOCIATION OF PROFESSIONAL-
TECHNICAL ADMINISTRATORS,

Case No.: 2024-001

12 Complainant,

Panel:

13 vs.

14 WASHOE COUNTY SCHOOL DISTRICT,

15 Respondent.
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18
19 **OPPOSITION TO MOTION TO EXPEDITE HEARING**

20 **COMES NOW**, Respondent Washoe County School District (“WCSD”), by and through
21 its undersigned counsel of record, and hereby files its Opposition to Motion to Expedite Hearing
22 (the “Opposition”) requesting that the State of Nevada Government Employee-Management
23 Relations Board (the “Board”) deny the Association of Professional-Technical Administrators’
24 (“APTA”) Motion to Expedite Hearing (the “Motion”).

25 **I. INTRODUCTION**

26 APTA’s Motion is an improper attempt to shoehorn the merits of its allegations contained
27 within its First Amended Complaint filed January 31, 2024, into the form of a request for
28 information (“RFI”) such that the EMRB hear the dispute on an expedited basis. This is a

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1 perversion of NRS 288.280, and this tactic is inconsistent with the purposes of NRS 288.280 and
2 should be rejected.

3 **II. FACTS AND RELEVANT PROCEDURAL HISTORY**

4 In its Motion, APTA falsely alleges that the District “unilaterally, and without the
5 permission of APTA” withdrew recognition from APTA. This is plainly false, as WCSD has
6 demonstrated in the briefing surrounding the Motion to Vacate Hearing, that is presently pending
7 before the Board in Case No. 2023-015. For further analysis of the factual context surrounding the
8 withdrawal of recognition, please see the briefing surrounding the Motion to Vacate Hearing
9 currently pending in related Case No. 2023-015. The facts surrounding this dispute will be fully
10 presented to the EMRB in the event a hearing on the First Amended Complaint is required.
11 However, the documents attached to the Reply in Support of the Motion to Vacate clearly and
12 unambiguously demonstrate APTA’s allegations are false. WCSD appropriately withdrew
13 recognition from APTA based on APTA’s application for voluntary withdrawal.

14 **III. THE MOTION SHOULD BE DENIED**

15 **A. THE MOTION IS IMPROPER UNDER NRS 288.280**

16 NRS 288.110(2) provides the deadlines within which the EMRB must conduct a hearing.
17 For the purposes of APTA’s First Amended Complaint, that means the Board has 180 days after it
18 decides to hear a complaint to conduct a hearing. *See* NRS 288.110(2). However, in NRS 288.280,
19 the Nevada Legislature outlined an expedited basis for the EMRB to hear disputes regarding “an
20 alleged failure to provide information as provided in NRS 288.180” requiring that they “be heard
21 and determined as soon as possible after the complaint is filed. . . .” NRS 288.280.

22 Similar to Congress, the Nevada Legislature, “does not alter the fundamental details of a
23 regulatory scheme in vague terms or ancillary provisions—it does not, one might say, hide
24 elephants in mouseholes.” *Whitman v. Am. Trucking Associations*, 531 U.S. 457, 468, 121 S. Ct.
25 903, 910, 149 L. Ed. 2d 1 (2001) (citations omitted). As applied here, it was certainly not the
26 intention of the Nevada Legislature to permit APTA to squeeze the “elephant” of the allegations
27 contained within the First Amended Complaint into the “mousehole” of NRS 288.280 regarding
28 responses to requests for information. The EMRB cannot rule on the question of whether WCSD’s

1 failure to respond to the request for information was proper without determining the underlying
2 issue of whether the allegations contained within the complaint regarding a withdrawal of
3 recognition are valid.

4 Indeed, APTA is transparent in its attempt to get the EMRB to rule on the RFI “and by
5 incorporation those issues brought to the Board in its First Amended Complaint . . . and the defense
6 raised by the District, in an expedited manner. . . .” Mot. at 3:9–13. Of note, the District has not
7 even answered the Complaint yet, nor has it raised any defenses. This is because the deadline to
8 respond to the Amended Complaint is not until February 20, 2024. However, APTA would seek to
9 have the EMRB rule on the dispute regarding the RFI, even though doing so requires the EMRB to
10 answer the ultimate question underlying the factual allegations contained within the First Amended
11 Complaint. Put simply, the Nevada Legislature never intended to permit this sort of gamesmanship
12 involving the request for information process. Instead, the reason for permitting an expedited
13 review of requests for information is to facilitate getting the parties back to the bargaining table.
14 APTA is not a recognized employee organization, and there are no negotiations with APTA as to
15 any of WCSD’s employees. Accordingly, APTA’s attempts to rely on NRS 288.280 are improper
16 and should be rejected.

17 **B. THE UNDERLYING REQUEST IS ALSO IMPROPER**

18 As it pertains to requests for information, NRS 288.180(2) provides that “the employee
19 organization . . . may request reasonable information concerning any subject matter included in the
20 scope of mandatory bargaining which it deems **necessary for and relevant to the negotiations.**”
21 *See* NRS 288.180(2) (emphasis added).

22 In this case, there are no negotiations because APTA is no longer a recognized employee
23 organization with the WCSD. In contravention of the above statute, APTA has sent WCSD an RFI,
24 when it knows there are no negotiations for which the RFI could be relevant to. In fact, APTA
25 knows that the parties attended a temporary restraining order hearing scheduled for February 14,
26 2024, at 10:00 a.m. before Second Judicial District Court Judge David Hardy in Case No. CV24-
27 00282. Accordingly, any suggestion by APTA that its RFI is somehow proper is inconsistent with
28 reality and an improper use of NRS 288.180. Indeed, unrecognized third parties who do not

1 represent any role in representing the interests of WCSD employees cannot send WCSD RFI's and
2 compel WCSD to answer. Accordingly, the EMRB should deny the Motion.

3 **C. EVEN IF IT WAS PROPER, APTA VOLUNTARILY WITHDREW**

4 Every single provision of NRS Chapter 288 cited by APTA presumes that APTA is a
5 recognized employee organization who WCSD is under an obligation to bargain with. *See* NRS
6 288.160. However, as APTA and this Board know, WCSD withdrew APTA's recognition in
7 response to an application for voluntary withdrawal of recognition pursuant to NAC 288.145. *See*
8 Motion to Vacate briefing in Case No. 2023-015.

9 Indeed, WCSD has responded to the RFI, and noted it rejected APTA's arguments that it
10 remained the bargaining representative. WCSD also asked counsel for APTA "[i]f you have any
11 authority for the proposition that NRS 288.180 applies to an unrecognized entity, please provide it
12 to me. Upon receipt of such authority, we will evaluate our position and potentially reconsider."
13 To date, APTA has not provided any authority to WCSD that this is the case.

14 To the contrary, the only available guidance from the EMRB on this question conclusively
15 establishes that APTA's position is incorrect. *See Deborah Boland, M. D., A Local Government*
16 *Employee and Member of the Umc Physicians' Bargaining Unit of Nevada Service Employees*
17 *Union, Seiu Local 1107, AFL-CIO, Clc Et. Al., Complainants Nevada Service Employees Union,*
18 *Item No. 802, 2015 WL 1324423, at *6-8 (March 23, 2015).* In *Boland* the EMRB reasoned that
19 "[u]pon UMC's acceptance of Local 1107's withdrawal, Local 1107 ceased to be the recognized
20 bargaining agent. Thereafter UMC **was not obligated or permitted under the Act to continue**
21 **negotiations** with Local 1107." *Id.* (emphasis added). WCSD accepted APTA's notice of
22 voluntary withdrawal on January 9, 2024. At that time, APTA ceased to be the recognized
23 bargaining agent and WCSD is not obligated, nor even *permitted* to continue negotiations with
24 APTA. This would indisputably include responding to an RFI dated over two (2) weeks after
25 WCSD had accepted APTA's notice of voluntary withdrawal. Accordingly, the Motion should also
26 be denied because requiring WCSD to respond to the RFI would expose it to a potential unfair labor
27 practice complaint for continuing negotiations with APTA. *See id.*

28 ///

1 APTA's voluntary withdrawal and WCSD's subsequent approval of that withdrawal also
2 mean that APTA lacks standing to bring this dispute before the EMRB. The First Amended
3 Complaint is clear, that APTA believes it continues as the "recognized bargaining unit for the school
4 psychologists and technical administrators at the District." First Am. Compl. at 2:4-5. However,
5 the RFI issued to WCSD asks WCSD to provide APTA with "the name, current position, hire date
6 and current salary step and rate for all members or eligible members of APTA." As described
7 above, WCSD's position is that the professional-technical employees are now represented by
8 Washoe Professional Technical Association ("WPTA"), not APTA. Accordingly, APTA has no
9 standing to request information concerning employees represented by another bargaining unit.
10 Furthermore, it would be improper for WCSD to dictate to APTA who its members are, or who the
11 employees are that are eligible to be members of APTA.

12 Additionally, because APTA is not a recognized employee organization by WCSD, it has
13 no standing to issue RFIs to the school district. As explained above, the Motion is being brought
14 pursuant to NRS 288.280 which allows for disputes under NRS 288.180 to be heard as soon as
15 possible. However, NRS 288.180 expressly contemplates ongoing negotiations and even requires
16 the RFI to be "relevant to the negotiations." NRS 288.180(2). There are no negotiations with
17 APTA because they are not a recognized employee organization. For this reason, APTA has no
18 standing to bring this Motion. Indeed, if APTA is not a recognized employee organization, it has
19 no right to issue RFIs or compel WCSD to respond to such RFIs. Consequently, APTA lacks
20 standing to bring a motion to expedite a hearing regarding this matter, because the RFIs themselves
21 were issued without standing.

22 III. CONCLUSION

23 Based on the foregoing, WCSD requests that the Court deny APTA's Motion to Expedite
24 Hearing.

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DATED: February 14, 2024

BY: /s/ Anthony L. Hall
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CERTIFICATE OF SERVICE

I, Terri Tribble, declare:

I am employed in the City of Reno, County of Washoe, State of Nevada by the law offices of Simons Hall Johnston PC. My business address is 690 Sierra Rose Dr., Reno, NV 89511. I am over the age of 18 years and not a party to this action.

On the below date, I served the foregoing **OPPOSITION TO MOTION TO EXPEDITE HEARING** by causing the document to be served via email, addressed as follows:

Ronald J. Dreher
P.O. Box 6494
Reno, NV 89513
ron@dreherlaw.net

Attorney for Complainant
ASSOCIATION OF PROFESSIONAL-
TECHNICAL ADMINISTRATORS

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed on February 14, 2024.

/s/ Terri Tribble
Employee of Simons Hall Johnston

1 Ronald J. Dreher
2 NV Bar No. 15726
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7 *Attorney for Complainant*

FILED
February 16, 2024
State of Nevada
E.M.R.B.
8:52 a.m.

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10 **BEFORE THE STATE OF NEVADA**
11
12 **GOVERNMENT EMPLOYEE-MANAGEMENT RELATIONS BOARD**

13 ASSOCIATION OF PROFESSIONAL-
14 TECHNICAL ADMINISTRATORS,

Case No.: 2024-001

15 Complainant,

Panel:

16 vs.

17 WASHOE COUNTY SCHOOL
18 DISTRICT,

19 Respondent.
20 _____/

21 **REPLY IN SUPPORT OF MOTION TO EXPEDITE HEARING**

22 **COMES NOW** Complainant ASSOCIATION OF PROFESSIONAL-TECHNICAL
23 ADMINISTRATORS, (“APTA”), by and through its undersigned attorney, hereby files its
24 Reply in Support of Motion to Expedite Hearing and moves the State of Nevada Employee-
25 Management Relations Board, (“Board”), to immediately order and set a hearing as soon as
26 possible pursuant to NRS 288.280.

27 **I. THE PARTIES**

28 The APTA is an employee organization as defined in N.R.S. 288.040. It is the
recognized bargaining unit for the school psychologists and technical administrators at the
District.

1 The WASHOE COUNTY SCHOOL DISTRICT, (“District”), is a local government
2 employer under NRS 288.060, a political subdivision of the State of Nevada which oversees
3 and supervises Washoe County School psychologists and technical administrators and is the
4 regulating authority with regard to policy.

5 MEMORANDUM OF POINTS AND AUTHORITIES

6 **II. INTRODUCTION**

7
8 On January 9, 2024, the District unilaterally, and without the permission of APTA,
9 withdrew recognition of APTA as the recognized bargaining unit for all APTA members.
10 Subsequent to this, the District recognized a rival employee organization, Washoe
11 Professional-Technical Administrators, as the recognized bargaining unit for professional-
12 technical, employees, a portion of APTA membership, and withdrew all labor organization
13 recognition to include that for the school psychologists. In response, APTA filed a Complaint
14 and a First Amended Complaint, (“FAC”), with the Board on January 24 and January 31,
15 2024, respectively. In the FAC, APTA alleged the District failed to provide information it
16 deems necessary for negotiations in violation of NRS 288.180. (FAC at ¶¶ 45-46).
17
18

19 **II. LEGAL AUTHORITY**

20 NRS 288.110(2) states in part that “[e]xcept as otherwise provided in this subsection
21 and NRS 288.115, 288.280 and 288.625, the Board shall conduct a hearing within 180 days
22 after it decides to hear a complaint.”
23

24 NRS 288.280 provides that “[a]ny controversy concerning prohibited practices may be
25 submitted to the Board in the same manner and with the same effect as provided in NRS
26 288.110, except that *an alleged failure to provide information as provided by NRS 288.180*
27 *must be heard and determined by the Board as soon as possible after the complaint is filed*
28 *with the Board.*” (emphasis added).

1 **III. ARGUMENT**

2 **a. APTA has not voluntarily withdrawn its recognition.**

3 Under NAC 288.145(1)(a) it is permissible for a local government employer to
4 withdraw recognition of an employee organization if the organization “[v]oluntarily withdraws
5 in writing as the bargaining representative.” Furthermore, NAC 288.145(2) provides that the
6 local government employer that wishes to withdraw recognition for any reason other than
7 voluntary withdrawal by an employee organization, “must request a hearing before the Board
8 and receive the written permission of the Board before withdrawing recognition of an
9 employee organization.” The Board had made it very clear that “[a] voluntary withdrawal
10 represents the only circumstances in which an employer may withdraw recognition without
11 first seeking the approval of this Board.” *Deborah Boland et al v. SEIU, Local 1107*, EMRB
12 Item No. 802, Case No. A1-045847 through A1-045864 (2015) (citing NAC 288.145(2))
13 (emphasis added). No such permission or approval to withdraw recognition of APTA has ever
14 been sought by the District or granted by this Board and the District has failed to provide any
15 evidence supporting any claim to the contrary.
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19 In its Reply in Opposition to the Motion to Vacate Hearing, filed by APTA on January
20 23, 2024, APTA provided overwhelming evidence demonstrating that it is the recognized
21 bargaining unit for its members and that it did not authorize the District to remove this
22 recognition. (Reply in Opposition to Motion to Vacate Hearing Exs. 1-5.) Clearly, APTA has
23 never voluntarily or otherwise withdrawn its recognition of any of its members.
24

25 **b. APTA’s request for information is proper under NRS 288.180.**

26 On January 24, 2024, APTA sent a request for information to the District in which it
27 requested information it deems necessary for the negotiations process. (Motion Ex. 1.) This
28 request was sent in preparation for the interest arbitration between the parties that was

1 scheduled for February 20-21, 2024, after APTA had declared impasse pursuant to NRS
2 288.217. Despite this declaration of impasse, on February 14, 2024, the parties continued their
3 off-the-record negotiations regarding setting additional negotiation dates and subjects related
4 to negotiations. Clearly, the parties are still engaged in negotiations. Additionally, as explained
5 in the FAC, the District's withdrawal of recognition of APTA plainly violates several statutes
6 under NRS 288 and this Board's previous decisions and is in no manner valid.
7

8 On January 26, 2024, the District responded to APTA's request for information and
9 refused to provide the information. (Motion Ex. 2.) In its response, the District objected to this
10 request stating that "on January 9, 2024 the Washoe County School District (District)
11 withdrew recognition of APTA as the bargaining representative for District employees. As
12 such, the provisions of NRS 288.180 no longer apply and we are not obligated to provide this
13 information." *Id.* As indicated by this response, the District's purported withdrawal of
14 recognition of APTA was unilateral and no evidence or support was, or can be, provided that it
15 was approved by this Board. *Id.* Again, no voluntary withdrawal of recognition of any APTA
16 employees was ever provided by APTA to the District, the District has never sought approval
17 of this Board to remove APTA's recognition as the exclusive bargaining unit, and the Board
18 has never provided its approval for the District to remove APTA's recognition.
19
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21 Furthermore, the parties entered into negotiations for a successor collective bargaining
22 agreement on January 10, 2023, and to date have not been able to reach an agreement. As
23 such, the parties are still engaged in the negotiations process as defined in NRS 288.170.
24 Given that the parties are still in negotiations, APTA is legally entitled to, and permitted by
25 NRS 288.180, to request information it deems necessary for negotiations. The District is
26 compelled to furnish this information "without unnecessary delay" and does not have the legal
27 right to refuse to provide this information. NRS 288.180; *Reno Police Protective Association*
28

1 v. *City of Reno*, EMRB Item No. 175, Case No. A1-045390 (1985) (holding that "[t]here is no
2 question that subsection (2) of NRS 288.180 specifically requires that the employee
3 organization be provided 'reasonable information concerning any subject matter included in
4 the scope of mandatory bargaining which it deems necessary for and relevant to the
5 negotiations.' Further, the statute requires that such information be furnished without
6 unnecessary delay"); *Clark County Public Employees Association, SEIU Local 1107 vs.*
7 *University Medical Center*, EMRB Item No. 299, Case No. A1-045501 (1992) (clarifying that
8 the "statutory criteria is that such information be reasonable, related to a subject within the
9 scope of mandatory bargaining, necessary for and relevant to the negotiations"); *Education*
10 *Support Employees Association vs. Clark County School District*, EMRB No. 541, Case No.
11 A1-045765 (2003).

14 Despite the statutory requirement and these unambiguous prior decisions of this Board,
15 as of the date of this Reply, 23 days since making the request, the information has not been
16 provided to APTA.

17
18 **c. The hearing must be expedited as required by NRS 288.280.**

19 As noted above, NRS 288.280 mandates that "*an alleged failure to provide*
20 *information as provided by NRS 288.180 must be heard and determined by the Board as*
21 *soon as possible after the complaint is filed with the Board.*" (emphasis added). In the FAC
22 filed on January 31, 2024, APTA requested information it deems necessary for negotiations
23 pursuant to NRS 288.180 and the District has flatly refused to provide this information. (FAC
24 at ¶¶ 45-46; Motion Exs. 1-2.)

26 In 2015, the Nevada Legislature changed the word "shall" in this NRS to "must,"
27 further emphasizing the desire of the Legislature to have cases involving a refusal to provide
28 information heard as expeditiously as possible. APTA has alleged, and provided evidence to

1 support this allegation, that it requested information under NRS 288.180, and the District has
2 refused to provide the requested information. Therefore, pursuant to NRS 288.280, this
3 hearing must be expedited and heard as soon as possible by the Board.

4 **IV. CONCLUSION**

5 In accordance with NRS 288.280, APTA hereby moves the Board to schedule and hold
6 a hearing regarding this request for information, and by incorporation those issues brought to
7 the Board in APTA's FAC filed on January 31, 2024, under EMRB case number 2024-001, in
8 an expedited manner and as soon as possible to address these egregious violations. This
9 Motion necessarily incorporates the FAC as the issue of APTA's recognition as the exclusive
10 bargaining unit for its members is an integral question that must be answered, and this is the
11 basis for the Opposition filed by the District on February 14, 2024. Based on the foregoing,
12 APTA respectfully requests the Board sanction the District and its representatives for their
13 egregious violations of statutes and this Board's jurisprudence and grant its Motion to
14 Expedite Hearing and order and set a hearing to decide these matters as soon as possible.
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19 DATED this 16th day of February, 2024.

20 /s/ Ronald J. Dreher
21 Ronald J. Dreher
22 NV Bar No. 15726
23 P.O. Box 6494
24 Reno, NV 89513
25 Telephone: (775) 846-9804
26 dreherlaw@outlook.com
27 *Attorney for Complainant*
28

CERTIFICATE OF SERVICE

Pursuant to NAC 288.070, the undersigned hereby certifies that I am the counsel for the Association of Professional-Technical Administrators and that on this date I served a true and correct copy of the preceding document addressed to the following:

Anthony Hall, Esq.
AHall@SHJNevada.com
Jonathan McGuire, Esq.
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by electronic service by transmitting the copy electronically as an attachment to electronic mail in portable document format.

DATED this 16th day of February, 2024.

/s/ Ronald J. Dreher _____
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CERTIFICATE OF SERVICE

Pursuant to NAC 288.070, the undersigned hereby certifies that I am the counsel for the Association of Professional-Technical Administrators and that on this date I served a true and correct copy of the preceding document addressed to the following:

Bruce Snyder, Esq.
Commissioner, EMRB
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DATED this 16th day of February, 2024.

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