

GREENMAN, GOLDBERG, RABY & MARTINEZ
A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

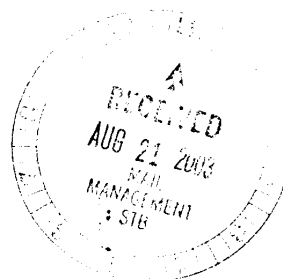
JOHN A. GREENMAN
AUBREY GOLDBERG
PAUL E. RABY
GABRIEL A. MARTINEZ
LISA M. ANDERSON
JOHN R. GORDON
VALERIE S. SANDERS

601 SOUTH NINTH STREET
LAS VEGAS, NEVADA 89101-7012

TELEPHONE: (702) 384-1616
FACSIMILE: (702) 384-2990

208747

August 18, 2003



Surface Transportation Board
1925 K Street, N.W.
Washington, DC 20423-0001

ENTERED
Office of Proceedings

AUG 21 2003

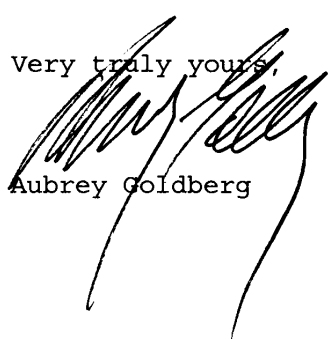
Re: STB Docket No. MC-F-21000

Part of
Public Record

Dear Sir/Madam:

I am in receipt of a decision showing that KBUS Holdings, LLC has filed an application under 49 U.S.C. 14303 to purchase and merge the assets and business operations of Valen Transportation, Inc. (MC-212398), among other companies. I have, therefore, enclosed a copy of judgments that have been entered and recorded against Valen Transportation, Inc. in the District Court of Clark County, Nevada, Case No. A432074 in an amount in excess of \$596,000.

Very truly yours,


Aubrey Goldberg

AG/11
Enclosures

cc: Stephen Flott

1 NEOJ
2 AUBREY GOLDBERG, ESQ.
3 Nevada Bar No. 002200
4 GREENMAN, GOLDBERG, RABY & MARTINEZ
5 601 South Ninth Street
6 Las Vegas, Nevada 89101
7 (702) 384-1616
8 Attorneys for Plaintiff

JUN 13 2 05 PM '03

DISTRICT COURT

CLARK COUNTY, NEVADA

9 DANIEL TRUJILLO,)
10 Plaintiff,)

11 vs.)

CASE NO.: A432074
DEPT. NO.: XIII

12 WAYNE BRADSHAW, individually;)
13 COACH LEASING, INC., an)
14 Illinois corporation; VALEN)
15 TRANSPORTATION, INC., a)
16 Corporation; and DOES I)
17 through X, and ROE)
18 CORPORATIONS I through X,)
19 inclusive,)
20 Defendants.)

21 Date of Trial: 05/13/03
22 Date of Verdict: 05/21/03

NOTICE OF ENTRY OF JUDGMENT ON JURY VERDICT

23 TO: WAYNE BRADSHAW and VALEN TRANSPORTATION, INC., Defendants;
24 and

25 TO: WILLIAM W. McGAHA, ESQ., DeLANOY, SCHUETZE & McGAHA,
26 attorneys for Defendant.

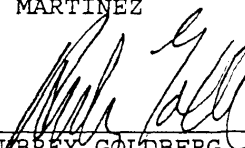
27 YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE that a
28 Judgment on Jury Verdict was entered in the above-captioned
action on the 11th day of June, 2003, and filed with the

REENMAN, GOLDBERG
RABY & MARTINEZ
601 SOUTH NINTH STREET
LAS VEGAS, NEVADA
89101-7012
(702) 384-1616
FAX: (702) 384-2990

1 Court on June 11, 2003, a copy of which is attached hereto.

2 Dated this 11th day of June, 2003.

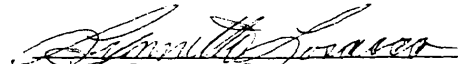
3 GREENMAN, GOLDBERG, RABY
4 & MARTINEZ

5
6 By 
7 AUBREY GOLDBERG, ESQ.
8 Nevada Bar No. 002200
9 601 South Ninth Street
10 Las Vegas, Nevada 89101
11 Attorneys for Plaintiff

12 CERTIFICATE OF MAILING

13 I hereby certify that on the 12th day of June, 2003, I
14 served the above and foregoing JUDGMENT ON JURY VERDICT by
15 depositing a true and correct copy thereof, postage prepaid, in
16 an envelope addressed to the following:

17 WILLIAM W. MCGAHA, ESQ.
18 DeLANOY, SCHUETZE & MCGAHA
19 601 South Rancho Drive
20 Suite C-20
21 Las Vegas, NV 89106
22 Attorneys for Defendants

23 
24 An Employee of Greenman,
25 Goldberg, Raby & Martinez

26 GREENMAN, GOLDBERG
27 RABY & MARTINEZ
28 601 SOUTH NINTH STREET
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89101-7012
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JUDG
AUBREY GOLDBERG, ESQ.
Nevada State Bar No. 002200
GREENMAN, GOLDBERG, RABY & MARTINEZ
601 South Ninth Street
Las Vegas, Nevada 89101
(702) 384-1616
Attorneys for Plaintiffs

FILED
JUN 11 2 21 PM '03
Shirley S. King
CLERK

DISTRICT COURT
CLARK COUNTY, NEVADA

* * * * *

DANIEL TRUJILLO,)
)
Plaintiff,)
)
vs.)
)
WAYNE BRADSHAW, individually;)
)
COACH LEASING, INC., an)
)
Illinois corporation; VALEN)
)
TRANSPORTATION, INC., a)
)
Corporation; and DOES I)
)
through X, and ROE)
)
CORPORATIONS I through X,)
)
inclusive,)
)
Defendants.)

CASE NO.: A432074
DEPT. NO.: XIII

Date of Trial: 5/13/03
Time of Trial: 9:00 a.m.

JUDGMENT UPON JURY VERDICT

This matter having come on regularly for trial in the
above-referenced Court commencing on May 13, 2003 and
continuing through jury verdict, the parties being represented
by their respective counsel, AUBREY GOLDBERG, ESQ., of the law
firm of GREENMAN, GOLDBERG, RABY & MARTINEZ, appearing for
Plaintiff, DANIEL TRUJILLO; and WILLIAM W. McGAHA, ESQ. and

GREENMAN, GOLDBERG
RABY & MARTINEZ
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1 JOHN R. PROVOST, ESQ. of the law firm of DeLANOY, SCHUETZE &
2 McGAHA appearing for Defendants, WAYNE BRADSHAW, COACH LEASING,
3 INC. and VALEN TRANSPORTATION.

4 A jury of eight persons was regularly impaneled to try
5 said action and witnesses on the part of the Plaintiff and
6 Defendants were sworn and examined. After hearing the
7 evidence, the arguments of counsel and the instructions of the
8 Court, the jury retired to consider its verdict in favor of
9 Plaintiff DANIEL TRUJILLO and against Defendants WAYNE BRADSHAW
10 and VALEN TRANSPORTATION.

11 WHEREFORE, by virtue of the law and by reason of the
12 premises aforesaid, and the Court not directing otherwise;
13

14 IT IS HEREBY ORDERED, ADJUDGED and DECREED that Plaintiff
15 DANILE TRUJILLO take judgment against Defendants WAYNE BRADSHAW
16 and VALEN TRANSPORTATION in the amount of \$254,150 for past
17 damages and \$254,150 for future damages for a total judgment of
18 \$508,300.

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25 REENMAN, GOLDBERG
26 RABY & MARTINEZ
27 31 SOUTH NINTH STREET
LAS VEGAS, NEVADA
89101-7012
(702) 384-1616
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28

1 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Plaintiff
2 DANIEL TRUJILLO have and recover from Defendants his
3 recoverable costs.

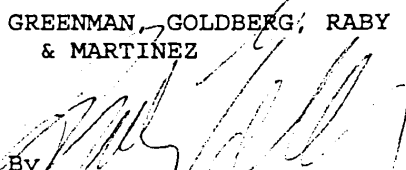
4 DATED this 11 day of June, 2003.

5
6 **MARK E. PETER**

7 DISTRICT COURT JUDGE

8 Submitted by:

9 GREENMAN, GOLDBERG, RABY
10 & MARTINEZ

11 
12 By AUBREY GOLDBERG, ESQ.
13 Nevada Bar #002200
14 601 South Ninth Street
15 Las Vegas, NV 89101
16 Attorneys for Plaintiff

17
18
19 When Recorded Mail To:

20 Aubrey Goldberg
21 Greenman, Goldberg, Raby & Martinez
22 601 South Ninth Street
23 Las Vegas, NV 89101

24 CLARK COUNTY, NEVADA
FRANCES DEANE, RECORDER

25 RECORDED AT THE REQUEST OF:
GREENMAN GOLDBERG ET AL

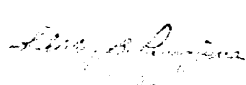
26 08-07-2003 10:25 DGI

BOOK/INSTR:20030007-01345
JUDGMENT

PAGE COUNT: 6

27 FEE: 19.00
28 RPT: 1.00

25 GREENMAN, GOLDBERG
26 RABY & MARTINEZ
27 601 SOUTH NINTH STREET
28 LAS VEGAS, NEVADA
89101-7012
(702) 384-1616
FAX: (702) 384-2990

3 AUG 7 '03

CLERK

1 NEO
2 AUBREY GOLDBERG, ESQ.
3 Nevada Bar No. 002200
4 GREENMAN, GOLDBERG, RABY & MARTINEZ
5 601 South Ninth Street
6 Las Vegas, Nevada 89101
7 (702) 384-1616
8 Attorneys for Plaintiff

JUL 15 2 27 PM '03

DISTRICT COURT

CLARK COUNTY, NEVADA

9 DANIEL TRUJILLO,)
10)
11 Plaintiff,)
12 vs.)
13 WAYNE BRADSHAW, individually;)
14 COACH LEASING, INC., an)
15 Illinois corporation; and)
16 DOES I through X, and ROE)
17 CORPORATIONS I through X,)
18 inclusive,)
19 Defendants.)

CASE NO.: A432074
DEPT. NO.: XIII

Date of Hearing:
Time of Hearing:

NOTICE OF ENTRY OF ORDER

YOU, AND EACH OF YOU WILL PLEASE TAKE NOTICE that an Order

. . .

. . .

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. . .

**CLARK COUNTY, NEVADA
FRANCES DEANE, RECORDER**

RECORDED AT THE REQUEST OF:
GREENMAN GOLDBERG ET AL

08-07-2003 10:25 DGI

BOOK/INSTR: 00030607-01344
ORDER

PAGE COUNT: 6

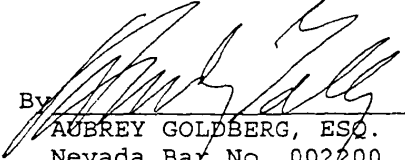
FEE: 10.00
RPT: .00

REENMAN, GOLDBERG
RABY & MARTINEZ 26
601 SOUTH NINTH STREET
LAS VEGAS, NEVADA
89101-7012
(702) 384-1616
FAX: (702) 384-2990

1 was entered in the above-entitled matter the 10th day of July,
2 2003, a copy of which is attached hereto.

3 Dated this 11th day of July, 2003.

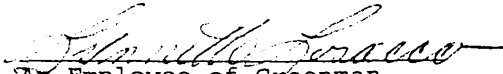
4 GREENMAN, GOLDBERG, RABY
5 & MARTINEZ

6
7 By 
8 AUBREY GOLDBERG, ESQ.
9 Nevada Bar No. 002200
601 South Ninth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiff

10 CERTIFICATE OF MAILING

11 I hereby certify that on the 11th day of July, 2003, I
12 served the above and foregoing NOTICE OF ENTRY OF ORDER by
13 depositing a true and correct copy thereof, postage prepaid, in
14 an envelope addressed to the following:
15

16 WILLIAM W. McGAHA, ESQ.
17 DeLANOY, SCHUETZE, McGAHA
& PROVOST
18 601 South Rancho Drive
Suite C-20
19 Las Vegas, NV 89106
Attorneys for Defendants

20
21 
22 An Employee of Greenman,
23 Goldberg, Raby & Martinez
24
25

26 GREENMAN, GOLDBERG
27 RABY & MARTINEZ
28 601 SOUTH NINTH STREET
LAS VEGAS, NEVADA
89101-7012
(702) 384-1616
FAX: (702) 384-2990

1 ORDR

2 AUBREY GOLDBERG, ESQ.

3 Nevada Bar No. 002200

4 GREENMAN, GOLDBERG, RABY & MARTINEZ

5 601 South Ninth Street

6 Las Vegas, Nevada 89101

7 (702) 384-1616

8 Attorneys for Plaintiff

FILED
JUL 10 1 49 PM '03

Shirley A. ...

9 DISTRICT COURT

10 CLARK COUNTY, NEVADA

11 DANIEL TRUJILLO,)

12 Plaintiff,)

13 vs.)

CASE NO.: A432074

DEPT. NO.: XIII

14 WAYNE BRADSHAW, individually;)

15 COACH LEASING, INC., an)

16 Illinois corporation; VALEN)

17 TRANSPORTATION, INC., a)

18 Corporation; and DOES I)

19 through X, and ROE)

20 CORPORATIONS I through X,)

21 inclusive,)

22 Defendants.)

23 ORDER RE: PLAINTIFF'S MOTION TO RETAX AND SETTLE COSTS AND
24 DEFENDANTS' MOTION TO STRIKE PLAINTIFF'S MEMORANDUM OF COSTS OR
25 IN THE ALTERNATIVE TO RETAX THE COSTS

26 Date of Hearing: 06/23/03

27 Time of Hearing: 9:00 a.m.

28 This matter having come on for hearing on June 23, 2003;

Plaintiff appearing by and through his attorney, Aubrey

Goldberg, Esq. of the law firm of Greenman, Goldberg, Raby &

Martinez; Defendants appearing by and through their attorney,

William W. McGaha, Esq. of the law firm of DeLanoy, Schuetze,

McGaha & Provost and the Court having reviewed all the

REENMAN, GOLDBERG
RABY & MARTINEZ
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1 pleadings, papers on file herein both in support of and in
2 opposition of the motions and being fully advised and having
3 heard arguments of counsel;

4 IT IS HEREBY ORDERED ADJUDGED AND DECREED that Defendants'
5 Motion to Strike Plaintiff's Memorandum of costs is **DENIED**;

6 As to Defendants' Motion to Retax Costs, this motion is
7 **GRANTED** as to the consultation fees of Dr. John Thalgott that
8 is in the sum of \$500, and Dr. Thalgott's expert witness fee is
9 retaxed at \$2,500. The balance of Defendants' motion is
10 **DENIED**. Thus, Plaintiff's costs are allowed in the sum of
11 \$12,564.92.
12

13 IT IS FURTHER ORDERED that as to Plaintiff's Motion to
14 Retax and Settle Costs of the Defendants, that Plaintiff's
15 motion is **GRANTED** as to all items except those specifically
16 demonstrated to be applicable only to COACH LEASING, INC. and
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REENMAN, GOLDBERG
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31 SOUTH NINTH STREET
LAS VEGAS, NEVADA
89101-7012 27
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1 COACH USA ADMINISTRATION, INC., to wit, their appearance fee of
2 \$81. Defendants' costs are thus allowed in the sum of \$81.

3 DATED this 9 day of July, 2003.
4

5 CLARK R. DENTON

6 DISTRICT COURT JUDGE

7 Submitted By:

8 GREENMAN, GOLDBERG, RABY
9 & MARTINEZ

10
11 By Aubrey Goldberg

12 AUBREY GOLDBERG, ESQ.
13 Nevada Bar #002200
14 601 South Ninth Street
15 Las Vegas, NV 89101
16 Attorneys for Plaintiff
17
18
19
20
21
22
23
24

When Recorded Mail To:

Aubrey Goldberg
Greenman, Goldberg, Raby & Martinez
601 South Ninth Street
Las Vegas, NV 89101

25 REENMAN, GOLDBERG
26 RABY & MARTINEZ
27 601 SOUTH NINTH STREET
28 LAS VEGAS, NEVADA
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DO NOT WRITE IN THESE SPACES
THIS DOCUMENT IS A
TRUE AND CORRECT COPY
OF THE ORIGINAL FILE

AUG 7 '03

Aubrey Goldberg
CLERK

1 NEO
2 AUBREY GOLDBERG, ESQ.
3 Nevada Bar No. 002200
4 GREENMAN, GOLDBERG, RABY & MARTINEZ
5 601 South Ninth Street
6 Las Vegas, Nevada 89101
7 (702) 384-1616
8 Attorneys for Plaintiff

FILED
JUL 31 2 14 PM '03
Clerk of Court
Francine

DISTRICT COURT

CLARK COUNTY, NEVADA

9 DANIEL TRUJILLO,)
10 Plaintiff,)
11 vs.)
12 WAYNE BRADSHAW, individually;)
13 COACH LEASING, INC., an)
14 Illinois corporation; and)
15 DOES I through X, and ROE)
16 CORPORATIONS I through X,)
17 inclusive,)
18 Defendants.)

CASE NO.: A432074
DEPT. NO.: XIII

Date of Hearing: 6/30/03
Time of Hearing: 9:30 a.m.

NOTICE OF ENTRY OF ORDER

YOU, AND EACH OF YOU WILL PLEASE TAKE NOTICE that an Order

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CLARK COUNTY, NEVADA
FRANCES DEANE, RECORDER

RECORDED AT THE REQUEST OF:
GREENMAN GOLDBERG ET AL

08-07-2003 10:25 DGI

BOOK/INSTR: 00030807-01345
NOTICE

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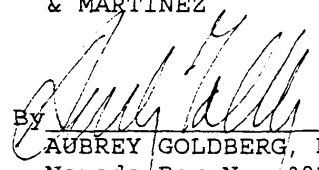
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RABY & MARTINEZ 26
01 SOUTH NINTH STREET
LAS VEGAS, NEVADA
89101-7012
(702) 384-1616
FAX: (702) 384-2990

1 was entered in the above-entitled matter the 28th day of July,
2 2003, a copy of which is attached hereto.

3 Dated this 29th day of July, 2003.

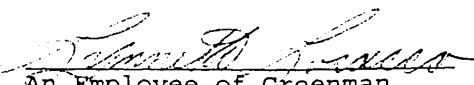
4 GREENMAN, GOLDBERG, RABY
5 & MARTINEZ

6
7 By 
8 AUBREY GOLDBERG, ESQ.
9 Nevada Bar No. 002200
601 South Ninth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiff

10 **CERTIFICATE OF MAILING**

11 I hereby certify that on the 30th day of July, 2003, I
12 served the above and foregoing NOTICE OF ENTRY OF ORDER by
13 depositing a true and correct copy thereof, postage prepaid, in
14 an envelope addressed to the following:
15

16 WILLIAM W. MCGAHA, ESQ.
17 DeLANOY, SCHUETZE, MCGAHA
& PROVOST
18 601 South Rancho Drive
Suite C-20
19 Las Vegas, NV 89106
Attorneys for Defendants

20
21 
22 An Employee of Greenman,
23 Goldberg, Raby & Martinez
24
25

26 GREENMAN, GOLDBERG
RABY & MARTINEZ
27 601 SOUTH NINTH STREET
LAS VEGAS, NEVADA
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(702) 384-1616
28 FAX: (702) 384-2990

1 **ORDER**

2 AUBREY GOLDBERG, ESQ.

3 Nevada Bar No. 002200

4 GREENMAN, GOLDBERG, RABY & MARTINEZ

5 601 South Ninth Street

6 Las Vegas, Nevada 89101

7 (702) 384-1616

8 Attorneys for Plaintiff

FILED

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Shirley S. Rungius
CLERK

9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 DANIEL TRUJILLO,)

12 Plaintiff,)

13 vs.)

CASE NO.: A432074

DEPT. NO.: XIII

14 WAYNE BRADSHAW, individually;)

15 COACH LEASING, INC., an)

16 Illinois corporation; VALEN)

17 TRANSPORTATION, INC., a)

18 Corporation; and DOES I)

19 through X, and ROE)

20 CORPORATIONS I through X,)

21 inclusive,)

22 Defendants.)

23 **ORDER RE: PLAINTIFF'S MOTION FOR ATTORNEYS' FEES**
24 **AND PRE-JUDGMENT INTEREST**

25 Date of Hearing: 06/30/03

26 Time of Hearing: 9:00 a.m.

27 This matter having come on for hearing on June 30, 2003;

28 Plaintiff appearing by and through his attorney, Aubrey

 Goldberg, Esq. of the law firm of Greenman, Goldberg, Raby &

 Martinez; Defendants appearing by and through their attorney,

 John R. Provost, Esq. of the law firm of DeLanoy, Schuetze,

 McGaha & Provost and the Court having reviewed all the

REENMAN, GOLDBERG
RABY & MARTINEZ 26
31 SOUTH NINTH STREET
LAS VEGAS, NEVADA
89101-7012
(702) 384-1616
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1 pleadings, papers on file herein both in support of and in
2 opposition of the motion and being fully advised and having
3 heard arguments of counsel;

4 IT IS HEREBY ORDERED ADJUDGED AND DECREED that the Court
5 having considered the factors set forth in *Beattie v. Thomas*,
6 99 Nev. 579, 668 P.2d 268 (1983) that Plaintiff's motion for
7 attorneys' fees is granted and attorneys' fees are awarded to
8 Plaintiff in the sum of \$25,000;
9

10 As to Plaintiff's motion for pre-judgment interest, pre-
11 judgment accrues on the portion of the judgment representing
12 past damages at the legal rate pursuant to NRS 17.130(2) and on
13 that portion representing future damages at the legal rate from
14 and after service of the offer of judgment pursuant to NRS
15 17.115 (4)(2). Accordingly, Plaintiff's motion for pre-
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REENMAN, GOLDBERG
RABY & MARTINEZ 26
31 SOUTH NINTH STREET
LAS VEGAS, NEVADA
89101-7012 27
(702) 384-1616
FAX: (702) 384-2990 28

1 judgment interest is granted and Plaintiff is awarded the sum
2 of \$50,749.96 as and for pre-judgment interest.

3 DATED this 24 day of July, 2003.

4
5 **MARK R. DENTON**

6 DISTRICT COURT JUDGE

7 Submitted By:

8 GREENMAN, GOLDBERG, RABY
9 & MARTINEZ

10
11 By Aubrey Goldberg
12 AUBREY GOLDBERG, ESQ.
13 Nevada Bar #002200
14 601 South Ninth Street
15 Las Vegas, NV 89101
16 Attorneys for Plaintiff

17
18
19
20
21 When Recorded Mail To:

22 Aubrey Goldberg
23 Greenman, Goldberg, Raby & Martinez
24 601 South Ninth Street
25 Las Vegas, NV 89101

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