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Attorneys for the Plaintiff

IN THE SECOND JUDICIAL DISTRICT COURT
IN AND FOR THE COUNTY OF WASHOE, STATE OF NEVADA

SOCIETY FOR THE PRESERVATION
OF VERDI, INC.,

Plaintiff, CASE NO:

vs.

DEPT NO:

CITY OF RENO,

Defendant. /

PETITION FOR WRIT OF MANDAMUS OR
IN THE ALTERNATIVE PROHIBITION OR
IN THE ALTERNATIVE FOR JUDICIAL REVIEW AND
FOR DECLARATORY AND INJUNCTIVE RELIEF

COMES NOW, SOCIETY FOR THE PRESERVATION OF VERDI, INC., the above-
captioned Plaintiff, by and through their attorneys, CHRISTOPHER ERIC MUMM, ESQ., and/or
ROBERT H. BROILI, ESQ., who hereby complains and alleges as follows:

1 1. That at all times herein mentioned the Plaintiff, SOCIETY FOR THE
2 PRESERVATION OF VERDI, INC., was and is a Nevada Corporation representing property
3 owners in the un-incorporated areas of Verdi, Nevada.

4 2. That the Defendant, the City of Reno, is an incorporated city within the
5 State of Nevada.

6 3. That this Court has the jurisdiction to issue a writ of mandamus and/or a
7 writ of prohibition against the implementation by the City of Reno of a tentative map which
8 would increase the density, land use and master plan designations from one dwelling unit per acre
9 to five single family dwelling units per acre in the affected area also known as Washoe County
10 Assessor's Parcel Number 038-132-25, hereinafter referred to as Parcel BH2.

11 4. That on or about January 18, 2018, the Defendant, CITY OF RENO, heard
12 the propose tentative map for 120 Meridian South Village I & II which is West of Deer Mountain
13 Road in an area in the unincorporated area of Washoe County known as Verdi.

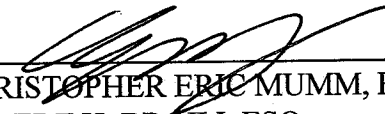
14 5. The parcel was part of the Mortensen-Garson Neighborhood Plan,
15 hereinafter referred to as "MGN Plan"), and was subject to the terms of a Settlement Agreement
16 on Case Number CV02-03469, that expired on November 8, 2012. The City of Reno adopted the
17 plan with notifying surrounding Washoe County property owners that the plan would increase
18 their neighborhood densities. Since the adoption by the City of Reno was not noticed to the Verdi
19 residents the adoption should be null and void and the properties should revert to their Washoe
20 County land uses and zonings.

21 6. AFFIRMATION OF COMPLIANCE WITH NRS 239B.030: The
22 undersigned does hereby affirm that this document or its attachments does NOT contain the social
23 security number of any individual, living or dead.
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WHEREFORE, The Plaintiff prays as follows:

1. For a determination that the adoption of the MGN Plan was not properly adopted in that Washoe County residents were not notified of the proposed plan and the increase in densities.
2. For a declaration the subject parcel should revert to the jurisdiction of Washoe County and to the previous zoning and land use densities.
3. For injunctive relief to block the City of Reno from adopting the tentative map until such time as sufficient plans have been developed to address local issues such as flooding, traffic, ingress and egress, water run-off, fire, and mule-deer migration.
4. For reasonable attorney's fees;
5. For costs of suit incurred herein; and
6. For such other and further relief as the Court deems just and proper.

DATED: April 5, 2018.


CHRISTOPHER ERIC MUMM, ESQ.
ROBERT H. BROILI, ESQ.
Attorneys for the Plaintiff