

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

KATE FELDMAN, an individual;  
STOP PREDATORY LENDING NV, a  
Nevada nonprofit corporation,

Appellants,

vs.

NEVADANS FOR FINANCIAL  
CHOICE, a Nevada Political Action  
Committee; CHRISTINA BAUER, an  
individual; FRANCISCO V.  
AGUILAR, in his official capacity as  
Nevada Secretary of State;  
DAILYPAY, INC., a Delaware  
Corporation; PREFERRED CAPITAL  
FUNDING-NEVADA, LLC, a Nevada  
limited liability company; ALLIANCE  
FOR RESPONSIBLE CONSUMER  
LEGAL FUNDING, an Illinois  
nonprofit corporation;  
ACTIVEHOURS, INC., a Delaware  
corporation; and STACY PRESS, an  
individual,

Respondents.

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Case No.: 24 OC 00021 1B

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Case No.: 24 OC 00029 1B

**AMICUS CURIAE NEVADANS FOR THE COMMON GOOD'S  
RESPONSE TO RESPONDENTS' OPPOSITIONS**

By: /s/ Courtney K. Lee

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## **I. DISCUSSION**

The objective of the Amicus Brief (Brief) submitted by Nevadans for the Common Good (NCG) is to introduce concerns and broad legal effects of a decision that will affect more than the parties directly involved. An amicus provides outside perspective which may assist the Court to understand what occurs on an individual level. NCG's Brief highlights how current interest rates and debt collection practices affect Nevadans - the biggest impact is keeping low income consumers on a treadmill of debt and poverty.

This Court should consider the benefit of the Brief against the prejudice to the Respondents for filing a single day late. It should be noted that NCG filed a Motion for Leave to file the Amicus Brief concurrently with the Brief. The benefit is understanding the harm everyday Nevadans face from industry practices.

Furthermore, even if the Court finds that some of NCG's arguments duplicate Appellants' arguments, it is an amplification of those arguments that provides discussion of additional implications for the unseen and unheard low income Nevadans. Like the person who obtained a high-interest loan to cover the difference in fluctuating paychecks, or a 63-year old single woman who started with a single short term loan but ended up stuck on the debt treadmill. If this Court should find the information in NCG's Brief helpful, we respectfully request that this Court grant leave to file and consider the Brief.

## II. CONCLUSION

This Court should grant Nevadans for Common Good's Motion for Leave to File Amicus Brief.

DATED this 15th day of May, 2024

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing Response to Respondents' Opposition to Nevadans for Common Good's Motion for Leave to File Amicus Brief were electronically served this 15th day of May, 2024, upon all counsel of record by using the Nevada Supreme Court's electronic filing system.

I further certify that all participants in this case are registered with the Supreme Court of Nevada's E-filing system, and that service has been accomplished to the following individuals through the Court's E-filing System or by first class United States mail, postage prepaid, at Las Vegas, Nevada as follows:

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