# In the Supreme Court of the State of Revada

May 22 2024 08:31 AM Elizabeth A. Brown Clerk of Supreme Court

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,

Respondents.

Case No.: 88526

District Court Case No.:

Lead Case No.: 24 OC 00018 1B

Consolidated with:

Case No.: 24 OC 00021 1B

Case No.: 24 OC 00023 1B

Case No.: 24 OC 00029 1B

# APPELLANTS' RESPONSE TO REQUEST FOR JUDICIAL NOTICE

BRADLEY S. SCHRAGER, ESQ. (NSB 10217) DANIEL BRAVO, ESQ. (NSB 13078)

# **BRAVO SCHRAGER LLP**

6675 S. Tenaya Way, Suite 200 Las Vegas, Nevada 89113

Attorneys for Appellants

#### N.R.A.P. 26.1 DISCLOSURE

Pursuant to N.R.A.P. 26.1, the undersigned counsel of record certifies that there are no persons or entities as described in N.R.A.P. 26.1(a) that must be disclosed.

The following law firm has appeared and/or is expected to appear in this Court on behalf of Appellants:

Bradley Schrager, Esq., and Daniel Bravo, Esq., of Bravo Schrager LLP.

DATED this 22nd day of May 2024.

#### BRAVO SCHRAGER LLP

By: /s/ Bradley S. Schrager

Bradley S. Schrager, Esq. (NSB 10217) Daniel Bravo, Esq. (NSB 13078) 6675 South Tenaya Way, Suite 200 Las Vegas, Nevada 89113

Tel.: (702) 996-1724

Email: bradley@bravoschrager.com Email: daniel@bravoschrager.com

### MEMORANDUM OF POINTS AND AUTHORITIES

On May 16, 2024, Respondent DailyPay, Inc., filed a request for judicial notice of the codification of new NRS Chapter 604D, with some intimation of a substantive concern regarding the Petition in this appeal.

Appellants have no objection to judicial notice of the public acts of the Legislative Counsel Bureau ("LCB"). Pursuant to NRS 220.120, however, LCB is empowered to re-order or renumber statutes as needed, to properly identify the effective laws of Nevada, for consistency and ease of comprehension. Appellants are confident that codification of the Petition, if enacted, will be accomplished in an appropriate manner, in relation to all other Nevada laws, without prejudice to the rights of Nevadans to propose and enact statutes by popular initiative.

DATED this 22nd day of May, 2024.

#### BRAVO SCHRAGER LLP

By: <u>/s/ Bradley S. Schrager</u> Bradley S. Schrager, Esq. (NSB 10217) Daniel Bravo, Esq. (NSB 13078) 6675 South Tenaya Way, Suite 200 Las Vegas, Nevada 89113

Tel.: (702) 996-1724

Email: bradley@bravoschrager.com Email: daniel@bravoschrager.com

# **CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of May, 2024, a true and correct copy of APPELLANTS' RESPONSE TO REQUEST FOR JUDICIAL NOTICE was served upon all counsel of record by electronically filing the document using the Nevada Supreme Court's electronic filing system:

By: <u>/s/ Dannielle Fresquez</u>

Dannielle Fresquez, an Employee of BRAVO SCHRAGER LLP