

1 IN THE SUPREME COURT OF THE STATE OF NEVADA

2
3 PAT SONGER,

Case No. 67414

Electronically Filed
Apr 22 2016 11:03 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

4 Appellants,

5 v.

6 RAYMOND DELUCCHI and
7 TOMMY HOLLIS,

8 Respondents
9 _____ /

10 **NOTICE OF SUPPLEMENTAL AUTHORITY**
11 **PURSUANT TO NRAP 31(e)**

12 TO: PAT SONGER, Appellant; and

13 TO: JOSEPH P. GARIN, ESQ., Attorney for Appellant:

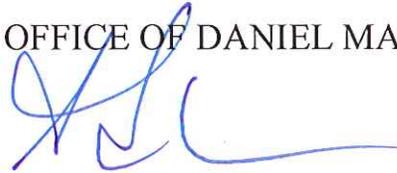
14 YOU AND EACH OF YOU WILL TAKE NOTICE that Respondents
15 Raymond Delucchi and Tommy Hollis by and through undersigned counsel Adam
16 Levine, Esq. of the Law Office of Daniel Marks hereby submits their
17 Supplemental Authorities Pursuant to NRAP 31(e) in support of their Answering
18 Brief.

19 On page 8 lines 3-12 of Respondent's Answering Brief the issue of the
20 application of the *Laffey* matrix for determining reasonable attorney's fees was

1 addressed. In *Prison Legal News v. Schwarzenegger*, 608 F.3d 446 (9th Cir. 2010)
2 the United States Court of Appeals for the Ninth Circuit rejected use of the *Laffey*
3 matrix as an appropriate basis for determining a reasonable fee. 608 F.3d at 454.

4 DATED this 22 day of April, 2016.

5 LAW OFFICE OF DANIEL MARKS

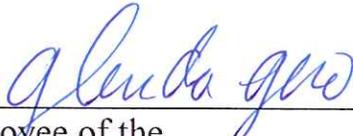
6 

7 DANIEL MARKS, ESQ.
8 Nevada State Bar No. 002003
9 ADAM LEVINE, ESQ.
10 Nevada State Bar No. 004673
11 610 South Ninth Street
12 Las Vegas, Nevada 89101
13 (702) 386-0536; FAX (702) 386-6812
14 *Attorneys for Respondents*

1 **CERTIFICATE OF SERVICE BY ELECTRONIC MEANS**

2 I hereby certify that I am an employee of the Law Office of Daniel Marks
3 and that on the 2nd day of April, I did serve the above and forgoing NOTICE OF
4 SUPPLEMENTAL AUTHORITY PURSUANT TO NRAP 31(e), by way of
5 Notice of Electronic Filing provided by the court mandated E-Flex filing service
6 to the following:

7 Joseph P. Garin, Esq.
8 Siria L. Gutierrez, Esq.
9 Lipson, Neilson, Cole, Seltzer Garin
10 9900 Covington Cross Drive, Ste. 120
11 Las Vegas, Nevada 89144
12 Email: jgarin@lipsonneilson.com
13 sgutierrez@lipsonneilson.com
14 *Attorneys for Appellant*

15
16
17
18
19
20


An employee of the
LAW OFFICE OF DANIEL MARKS