

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

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3
4 CHRISTOPHER D. DAVIS,

5 Appellant,

6 v.

7 CAROLINE DAVIS,

8 Respondent.

Case No.: 68542
Electronically Filed
Dec 04 2015 11:25 a.m.
Tracie K. Lindeman
Eighth Judicial District Court
Clerk of Supreme Court
Case No.: P-15-083867-T (In re
the Beatrice B. Davis Family
Heritage Trust, dated July 28,
2000)

9
10 **NOTICE OF SUPPLEMENTAL AUTHORITIES TO APPELLANT’S**
11 **OPENING BRIEF PURSUANT TO NRAP 31(e)**

12
13 Comes now, Christopher D. Davis, Appellant, by and through his attorneys,
14 Anthony L. Barney, Esq., of the law firm of Anthony L. Barney, Ltd., and Harriet
15 Roland of the Roland Law Firm and hereby supplements Appellant’s Opening
16 brief with supplemental authorities to be included as a separate section entitled
17 “Applicable Standard of Review” in the preliminary sections of Appellant’s
18 Opening Brief as Page “xv”. This supplement is to notify this Court the standard
19 of review that applies to this case. Appellant further supplements the Table of
20 Contents to reference this preliminary section as page “xv” and also supplements
21 his Table of Authorities to include the referenced case law included in the
22 “Applicable Standard of Review” preliminary section as set forth below:
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1 **APPLICABLE STANDARD OF REVIEW**

2 The applicable standard of review in this matter is a de novo standard,
3
4 because it involves pure questions of law and interpretations of statutory
5 provisions.¹ The questions of law include, but are not limited to, whether the
6 Eighth Judicial District Court has jurisdiction over an express trust and its
7 purported trust investment adviser under a constructive trust theory, whether an
8 investment trust adviser is considered a trustee for purposes of NRS 155.190(h),
9 and whether in personam jurisdiction is automatically granted over an investment
10 trust adviser under NRS 163.5555 or NRS 164.010.
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22 ¹ *Vredenburg v. Sedgwick CMS*, 124 Nev. 553, 188 P.3d 1084, 2008 Nev. LEXIS
23 65, 124 Nev. Adv. Rep. 53 (Nev. 2008) (“Pure questions of law...we review de
24 novo.”). *Marquis & Aurbach v. Eighth Judicial Dist. Court*, 122 Nev. 1147, 146
25 P.3d 1130, 2006 Nev. LEXIS 126, 122 Nev. Adv. Rep. 97 (Nev. 2006) (“This
26 court reviews a district court's interpretation of a statute or court rule...de novo,
27 even in the context of a writ petition.”). *Szydel v. Markman*, 121 Nev. 453, 117
28 P.3d 200, 2005 Nev. LEXIS 62, 121 Nev. Adv. Rep. 47 (Nev. 2005) (“Our review
of statutory provisions is de novo”); *Waldman v. Maini*, 124 Nev. 1121, 195 P.3d
850, 2008 Nev. LEXIS 101, 124 Nev. Adv. Rep. 93 (Nev. 2008) (“The appellate
court will review a purely legal question...de novo”)

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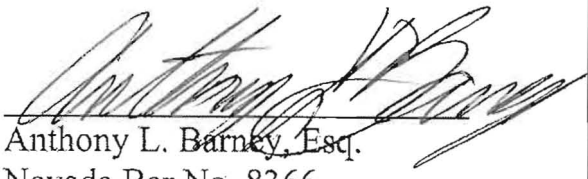
DATED this 3rd day of December, 2015.

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of Anthony L. Barney, Ltd., and not
3 a party to this action. I further certify that on the 4th day of December, 2015, I
4 served the foregoing **NOTICE OF SUPPLEMENTAL AUTHORITIES TO**
5 **APPELLANT’S OPENING BRIEF PURSUANT TO NRAP 31(e)** by first
6
7 class US mail, postage prepaid, upon the following persons or entities:
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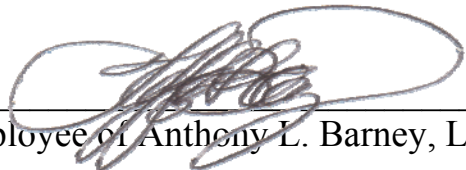
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Dept. 26, Eighth Judicial Dist. Court
Regional Justice Center
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