

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

3
4 GENEVA M. SIMMONS, an Individual

5 Appellant,

6 vs.

7 JESUS M. BRIONES, an Individual

8 Respondent.

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Tracie K. Lindeman
CLERK OF SUPREME COURT

**MOTION FOR LEAVE
TO FILE
BRIEF OF AMICUS CURIAE
OF THE NEVADA
JUSTICE ASSOCIATION
IN SUPPORT
OF RESPONDENT**

11 Pursuant to Nevada Appellate Rule 29 the Nevada Justice Association
12 respectfully moves this Honorable Court to grant leave to file the accompanying
13 Brief of *Amici Curiae* in this case.

14 **1. Interest of Amici Curiae.**

15 The Nevada Justice Association ("NJA") is a non-profit organization of
16 independent lawyers who represent consumers and share the common goal of
17 improving the civil justice system. NJA aims to ensure that Nevadans' access to the
18 courts and to justice is not diminished. NJA also works to advance the science of
19 jurisprudence, to promote the administration of justice for the public good, and to
20 uphold the honor and dignity of the legal profession. NJA has submitted to this
21 Court a motion for leave to file this brief.

22 **2. The accompanying amicus brief is desirable and will assist this**
23 **Court.**

24 The accompanying *amicus* brief will address a question presented in this case:
25 Whether Nevada's Unsatisfied Judgment Statute, and, in particular, NRS 485.302
26 (1), applies to a judgment for attorneys fees and costs only.

27 It is an issue that will affect many Nevadans beyond the parties to this case.
28

1 NJA is confident that its members' experience in litigation and judicial procedure
2 will assist this Court.

3 For the foregoing reasons, *Amici* request this Court to grant their motion for
4 leave to file the accompanying brief in this case.

5
6 Dated this 9th day of June, 2016.

7
8 THOMAS & SPRINGBERG, PC

9 By: /s/ Andrew J. Thomas
10 Andrew J. Thomas, Esq.
11 Nevada Bar No. 000017
12 844 East Sahara Avenue
13 Las Vegas, Nevada 89104
14 Attorneys for *Amicus Curiae*
15 *Nevada Justice Association*
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CERTIFICATE OF SERVICE

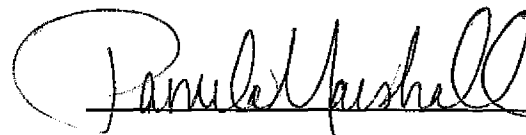
Pursuant to N.R.A.P. 31 I certify that I am an employee of Thomas & Springberg and on this 9th day of June, 2016, I electronically filed and served a true and correct copy of the foregoing

MOTION FOR LEAVE TO FILE BRIEF OF AMICUS CURIAE OF THE NEVADA JUSTICE ASSOCIATION IN SUPPORT OF RESPONDENT by electronic mail and by regular mail by depositing a copy of same for mailing in the United States Mail, in a sealed envelope addressed to:

Dennis L. Kennedy, Esq.
Sarah E. Harmon, Esq.
Amanda L. Stevens, Esq.
BAILEY KENNEDY
8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148-1302
Email: Dkennedy@BaileyKennedy.com
Email: Sharmon@BaileyKennedy.com
Email: Astevens@BaileyKennedy.com
Attorneys for Appellant Geneva M. Simmons

Cliff W. Marcek, Esq.
CLIFF W. MARCEK, PC
700 South Third Street
Las Vegas, Nevada 89101
Email: cwmarcek@marceklaw.com
Attorneys for Respondent Jesus Manuel Briones

Adam Paul Laxalt, Esq.
Attorney General
Adam D. Honey, Esq.
Deputy Attorney General
555 East Washington Ave.
Suite 3900
Las Vegas, Nevada 89101
Email: ahoney@ag.nv.gov
Attorneys for Respondent Nevada Department of Motor Vehicles



Pamela Marshall, an employee of
Thomas & Springberg, PC