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Elizabeth A. Brown
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IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHELLE FLORES, AN
INDIVIDUAL,

Appellant,

vs.

LAS VEGAS-CLARK COUNTY
LIBRARY DISTRICT, A
POLITICAL SUBDIVISION OF
THE STATE OF NEVADA,

Respondent.

Supreme Court No. 72462

District Court No. A735496

RESPONDENT'S NOTICE OF SUPPLEMENTAL AUTHORITIES

Pursuant to Rule 31 of the Nevada Rules of Appellate Procedure,
Respondent, the Las Vegas-Clark County Library District ("Library District")
supplements its Answering Brief as follows:

1 1. The Library District supplements Section VII.B.1.b (pages 18-22) with
2 the following authority:

3 a. *Doe v. Medford School Dist.*, 549C, 221 P.3d 787, 793 (Or. Ct. App.
4 2009) (holding that school district’s internal employment policy
5 prohibiting employees from possessing firearms on school district
6 property was not preempted by state statute because (1) the term
7 “ordinance” as used in the statute dictating that “no county, city or other
8 municipal corporation or district may enact civil or criminal ordinances”
9 related to firearms refers to a local law that “is ‘enacted’ into law by
10 governmental entities acting in their legislative capacities; and (2) the
11 statute vesting “the authority to regulate in any matter whatsoever
12 any element relating to firearms” in the legislature “intended to target
13 only ‘regulations’ in the sense of enacted laws by municipal authorities
14 acting on their ‘organic authority as a governmental entity’”) (citations
15 omitted).

16 b. *Wolfe v. Twp. of Salisbury*, 880 A.2d 62, 68-69 (Pa. Commw. Ct. 2005)
17 (holding that State Game Law which occupied the “field of public safety
18 and the regulation of hunting and trapping” did not preempt the

township’s ordinance(s) regulating hunting in parks owned by the township because the ordinance(s) did not seek to regulate hunting throughout township—“the township was not acting as a *municipality*, but rather as a *property owner*”).

2. The Library District supplements Section VII.B.1.b (pages 22-25) with the following authority: *Mich. Gun Owners, Inc. v. Ann Arbor Public Schools*, No. 155196 & 155204, 2018 WL 3614337, at *6 (Mich. July 27, 2018) (holding that state law did not preempt school districts’ policies limiting firearms on school grounds because the “statute’s *partial* list of local units of government that may not regulate firearms” demonstrates “intent to preempt some local units of government from regulation but not others”—*i.e.* “legislative intent *not* to occupy the field”).

DATED this 21st day of August, 2017.

BAILEY ♦ KENNEDY

By: /s/ Kelly B. Stout

DENNIS L. KENNEDY
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*Attorneys for Respondent
Las Vegas-Clark County Library District*

CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ♦ KENNEDY and that on the 21st day of August 2017, service of the foregoing RESPONDENT’S NOTICE OF SUPPLEMENTAL AUTHORITIES, was made by electronic service through the Nevada Supreme Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known addresses:

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Settlement Judge

/s/ Kelly B. Stout

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