

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

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VETERANS IN POLITICS  
INTERNATIONAL, INC. AND STEVE W.  
SANSON,

Appellant,

vs.

MARSHAL S. WILICK AND WILICK  
LAW GROUP,

Respondent.

Electronically Filed  
Jan 14 2019 04:23 p.m.  
S.C. NO. 7784  
D.C. NO: A17-50171-C  
Elizabeth A. Brown  
Clerk of Supreme Court

**RESPONDENTS' MOTION FOR LEAVE TO FILE SUPPLEMENTAL  
BRIEF ADDRESSING THIS COURT'S REQUESTS DURING ORAL  
ARGUMENT**

COMES NOW Respondent, MARSHAL S. WILICK AND WILICK  
LAW GROUP, by and through their attorney of record, Jennifer V. Abrams, Esq.,  
of The Abrams & Mayo Law Firm, and hereby moves this Court pursuant to  
NRAP 27 for leave to file a supplemental brief addressing this Court's requests  
during the January 9<sup>th</sup> oral argument for (a) citations to the Appendix regarding  
Appellant's purported "corrections" to one of the defamatory statements under  
NRS 41.336 and NRS 41.337, and (b) the impact on this case of this Court's recent  
holding in *Coker v. Sassone*, 135 Nev. Adv. Op. 2 (Jan. 3, 2019).

Considering the *de novo* standard of review set forth in *Coker*, it is critical that this Court be directed to the portions of the record evidencing that a “correction” was never issued, the Appellants responded to an on-line comment asking whether Mr. Willick was really convicted of sexual coercion of a minor child by claiming “everything we put out is true,” the “clarification” that *was* issued falsely accused Mr. Willick of being “guilty” of an additional crime, the scope of dissemination of the “clarification” was much smaller than that of the original admittedly defamatory posts, and the original defamatory post was re-disseminated at least 16 times *after* the “clarification” was issued. All pin-point Appendix citations and quotes are detailed in the Supplement.

During argument, this Court also requested commentary on the decision in *Coker* and its application to this matter; this also is addressed in the Supplement.

Respondents believe that providing the citations request along with limited explanations and a discussion of whether NRS 41.336 and NRS 41.337 apply to these facts, and suggesting the proper application of *Coker* as requested would assist this Court in resolving this matter. The Supplement further identifies the background materials, detailed in another pending appeal, that explain why the months-long defamation campaign was launched against Mr. Willick.

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Respondents' proposed supplemental brief is being submitted concurrently with this motion.

DATED: Monday, January 14, 2019.

Respectfully submitted,

THE ABRAMS & MAYO LAW FIRM

/s/ Jennifer V. Abrams, Esq.  
Jennifer V. Abrams, Esq.  
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Attorney for Respondents

## CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of THE ABRAMS & MAYO LAW FIRM and that, on this 14<sup>th</sup> day of January, 2019, *Respondent's Motion for Leave to File Supplemental Brief Addressing this Court's Request During Oral Argument* was filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list as follows, to the attorney's listed below:

Anat Levy, Esq.  
Anat Levy and Associates, P.C.  
*Attorney for Appellants*

Marc J. Randazza, Esq.  
Randazza Legal Group, PLLC  
*Counsel for Amici Curiae*

/s/ David J. Schoen, IV, ACP  
An Employee of THE ABRAMS & MAYO LAW FIRM