

Case No. 73785

IN THE SUPREME COURT OF NEVADA

BANK OF AMERICA, N.A., THE
BANK OF NEW YORK MELLON
F/K/A THE BANK OF NEW YORK
MELLON AS TRUSTEE FOR THE
CERTIFICATEHOLDERS OF THE
CWABS, INC., ASSET-BACKED
CERTIFICATES, SERIES 2005-17;
AND MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.,

Appellants,

vs.

THOMAS JESSUP, LLC SERIES VII;
FOXFIELD COMMUNITY
ASSOCIATION; AND ABSOLUTE
COLLECTION SERVICES, LLC,

Respondents.

Electronically Filed
Apr 02 2019 12:00 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

**MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF
IN SUPPORT OF RESPONDENT'S PETITION FOR REHEARING**

Michael Beede, Esq.
Nevada Bar No. 13068
THE LAW OFFICE OF MIKE BEEDE, PLLC
2470 Saint Rose Pkwy, Suite 201
Henderson, NV 89074
Telephone: (702) 473-8406
Facsimile: (702) 832-0248
eservice@LegallV.com
Attorney for RJRN Holdings, LLC

NRAP 26.1 DISCLOSURE

The undersigned counsel to amicus RJRN Holdings, LLC (“RJRN”) certifies that the following are persons and entities as described in NRAP 26.1(a) and must be disclosed. These representations are made so the judges of this court may evaluate possible disqualification or recusal.

RJRN is a privately held Nevada limited liability company and there is no publicly held company that owns 10% or more of RJRN Holdings, LLC’s membership interest.

Amicus RJRN is represented by Michael Beede, Esq., and James Fox, Esq. of The Law Office of Mike Beede, PLLC.

DATED this 1st day of April, 2018.

THE LAW OFFICE OF MIKE BEEDE

/s/ Michael Beede

Michael Beede, Esq.
Nevada Bar No. 13068
2470 Saint Rose Pkwy, Suite 307
Henderson, NV 89074
Telephone: (702) 473-8406
Facsimile: (702) 832-0248
eservice@LegalLV.com
Attorney for RJRN Holdings, LLC

**MOTION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF IN SUPPORT OF
RESPONDENT’S PETITION FOR REHEARING**

Pursuant to NRAP 29(c), RJRN Holdings, LLC (“RJRN”) respectfully requests leave to file an *amicus brief* in support of Thomas Jessup, LLC’s Petition for Rehearing.

I. RJRN’S INTEREST¹

RJRN buys properties at association non-judicial foreclosure sales. Many of these properties are the subject of lawsuits in Nevada’s state and federal courts.

RJRN has a strong interest in the subject matter of this Court’s Opinion because it addresses the legal effect when a bank asks for information, but ultimately fails to send payment to an Association. This issue permeates multiple cases that RJRN still has pending before this court on appeal and in the lower state and federal courts.

II. THE REASONS WHY AN AMICUS BRIEF IS DESIRABLE.

Respondent’s Petition focuses on the Court’s misapplication of the standard of review to the specific facts in the case. In contrast, RJRN’s proposed amicus brief

¹ NRAP 29(c)

focuses on the misapplication of the cases and secondary sources relied on by the Court, and is therefore desirable because it addresses the general application.

CONCLUSION

Based on the foregoing, RJRN respectfully requests this Court grant it permission to file its amicus brief, a copy of which is being filed concurrently pursuant to NRAP 29(c) and this Court's instruction.

Respectfully submitted this 1st day of April, 2019.

THE LAW OFFICE OF MIKE BEEDE

/s/ Michael Beede

Michael Beede, Esq.
Nevada Bar No. 13068
2470 Saint Rose Pkwy, Suite 307
Henderson, NV 89074
Telephone: (702) 473-8406
Facsimile: (702) 832-0248
eservice@LegalLV.com
Attorney for RJRN Holdings, LLC

CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 1st day of April, 2019. Electronic service of the foregoing **MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF IN SUPPORT OF RESPONDENT'S PETITION FOR REHEARING** was made pursuant to the Master Service List.

Dated this 1st day of April, 2019.

/s/ Michael Beede

An employee of The Law Office of Mike Beede