

Case No. 77010
IN THE SUPREME COURT OF NEVADA

JP MORGAN CHASE BANK,
National Association, a national
association

Appellant,

vs.

SFR INVESTMENTS POOL 1, LLC,
Respondent.

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Elizabeth A. Brown
Clerk of Supreme Court

APPEAL

From the Eighth Judicial District Court, Clark County
The Honorable JIM CROCKETT, District Judge
District Court Case No. A-13-692304-C

RESPONDENT'S NOTICE OF SUPPLEMENTAL AUTHORITIES

JACQUELINE A. GILBERT, ESQ.
Nevada Bar No. 10593

KAREN L. HANKS, ESQ.
Nevada Bar No. 9578

KIM GILBERT EBRON
7625 Dean Martin Drive, Suite 110
Las Vegas, Nevada 89139
Telephone: (702) 485-3300
Facsimile: (702) 485-3301

SFR submits this Notice of Supplemental Authorities to bring to the Court's attention the following case, *Stalk v. Mushkin*, 125 Nev. 21, 26, 199 P.3d 838, 841 (2009) citing *Zimmerman v. Bank of America National T. & S. Ass'n*, 191 Cal.App.2d 55, 12 Cal.Rptr. 319, 321 (1961) ("The actionable wrong lies in the inducement to break the contract or to sever the relationship, not in the kind of contract or relationship so disrupted, whether it is written or oral, enforceable or not enforceable."). *See* NRAP 31(e).

This case supports SFR's argument found on page 5 of its Petition for Rehearing. Specifically, this precedent supports the argument that the Bank's quiet title claim sounds in tort, despite being tangentially connected to a contract, just like Nevada considers intentional interference with a contract a tort, despite this claim revolving entirely around a contract because what drives the claim is not necessarily the contract itself (although a requisite element), but rather the act of one **interfering** with the contract. *See Stalk, supra*.

DATED this 15th day of December, 2020.

KIM GILBERT EBRON

/s/ Karen L. Hanks

KAREN L. HANKS, ESQ.

Nevada Bar No. 9578

7625 Dean Martin Drive, Suite 110

Las Vegas, Nevada 89139

Telephone: (702) 485-3300

Facsimile: (702) 485-3301

CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on this 15th day of December, 2020. Electronic service of the foregoing **Notice of Supplemental Authorities** shall be made in accordance with the Master Service.

/s/ Karen L. Hanks

An employee of Kim Gilbert Ebron