

IN THE SUPREME COURT OF THE STATE OF NEVADA

**EDGEWORTH FAMILY TRUST; AND
AMERICAN GRATING, LLC**

Appellants/Cross-Respondents,

vs.

**DANIEL S. SIMON; AND THE LAW
OFFICE OF DANIEL S. SIMON, A
PROFESSIONAL CORPORATION,**

Respondents/Cross-Appellants.

NO. 77678

Electronically Filed
Jan 16 2020 09:59 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

**EDGEWORTH FAMILY TRUST; AND
AMERICAN GRATING, LLC,**

Appellants

vs.

**DANIEL S. SIMON; AND THE LAW
OFFICE OF DANIEL S. SIMON, A
PROFESSIONAL CORPORATION**

Respondents.

NO. 78176

**THE LAW OFFICE OF DANIEL
S. SIMON,**

Petitioner

vs.

**THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF NEVADA,
IN AND FOR THE COUNTY OF CLARK;
AND THE HONORABLE TIERRA
DANIELLE JONES, DISTRICT JUDGE,**

**Respondents,
and**

NO. 79821

EDGEWORTH FAMILY TRUST; AND
AMERICAN GRATING, LLC,
Real Parties in Interest.

**MOTION FOR LEAVE TO FILE BRIEF OF AMICUS CURIAE OF
NATIONAL TRIAL LAWYERS IN SUPPORT OF DANIEL S. SIMON AND
THE LAW OFFICE OF DANIEL S. SIMON; AND, IN SUPPORT OF
AFFIRMANCE OF THE DISMISSAL OF THE CONVERSION CLAIM**

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NRAP 29(a) provides the authority for National Trial Lawyers to seek leave to file this Amicus Brief and hereby moves this court for permission to file its Amicus Brief and have the arguments of the National Trial Lawyers considered in reaching a decision in this case.

The National Trial Lawyers is an organization comprised of elite trial lawyers representing clients to promote the fair and effective representation of clients. In order to promote the standards of practice and to effectively represent clients, an attorney charging lien is a necessary tool and effective process to allow lawyers to effectively do their job without the fear of a disgruntled client attempting to compromise the work performed by filing a collateral action.

The National Trial Lawyers has a significant interest in preserving the spirit and intent of the charging lien statutes, and case law, in order to protect the fair and effective representation of clients. Robert Eglet has served on the Executive Committee of the National Trial Lawyers for 12 years and is being inducted as the President-Elect of the National Trial Lawyers on Sunday, January 19, 2020 at its Annual Executive Committee Meeting in Miami, FL. Therefore, the National Trial Lawyers hereby seeks leave of the Court to file its brief of Amicus Curiae in support of Daniel S.

Simon and the Law Office of Daniel S. Simon; and, in support of affirmance of the dismissal of the conversion claim.

DATED this 16th day of January, 2020.



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CERTIFICATE OF COMPLIANCE

I hereby certify that this Motion for Leave to file Brief of Amicus Curiae of The National Trial Lawyers in Support of Daniel S. Simon and The Law Office of Daniel S. Simon; and, Supporting Affirmance of the Dismissal of the Conversion Claim complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6) because this brief has been prepared in a proportionally spaced typeface using Word Perfect 11 in 14 point Times New Roman font. I further certify that this brief complies with the page or type volume limitation of NRAP 32(a)(7) because, excluding the parties of the brief exempted by NRAP 32(a)(7)(C) it does not exceed 30 pages.

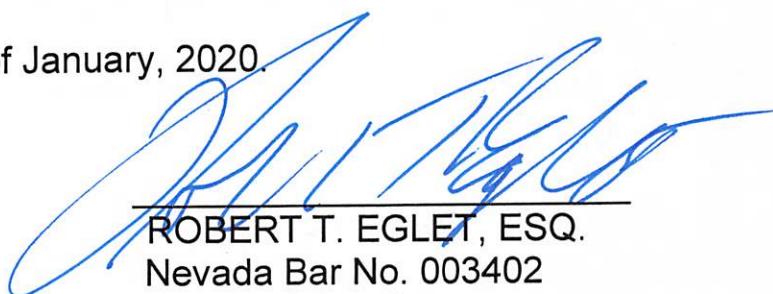
I hereby certify that I have read this Motion For Leave to file Brief Of Amicus Curiae of National Trial Lawyers in Support of Daniel S. Simon and The Law Office of Daniel S. Simon; and, Supporting Affirmance of the Dismissal of the Conversion Claim, and to the best of my knowledge, information, and belief, it is not frivolous or interposed for any improper purpose. I further certify that this motion and brief are filed in conjunction with the Answering Brief of Law Office of Daniel S. Simon and the Petition for Writ of Mandamus complies with all applicable Nevada Rules of

Appellate Procedure, in particular NRAP 28(e)(1), which requires every assertion in the brief regarding matters in the record be supported by a reference to the page of the transcript or appendix where the matter relied on is to be found.

I certify that I have been a member of the National Trial Lawyers Executive Committee for 12 years and will be inducted as President-Elect of the National Trial Lawyers on January 19, 2020 at our National Trial Lawyers Executive Committee Meeting at the National Trial Lawyers Summit held annually in Miami, FL. I further certify that I have authority to file this motion and the brief of Amicus Curiae on behalf of the National Trial Lawyers.

I understand that I may be subject to sanctions in the event that it is not in conformity with the Nevada Rules of Appellate Procedures.

DATED this 16th day of January, 2020.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 16 day of January, 2020, I served a copy of the foregoing Brief of Amicus Curiae of National Trial Lawyers in Support of Daniel S. Simon and The Law Office of Daniel S. Simon; and, Supporting Affirmance of the Dismissal of the Conversion Claim electronically to all registered parties.



an employee of EGLET ADAMS