

In the Supreme Court of Nevada

THE STATE OF NEVADA DEPARTMENT
OF BUSINESS AND INDUSTRY,
FINANCIAL INSTITUTIONS DIVISION,

Appellant,

vs.

TITLEMAX OF NEVADA, INC., a
Delaware corporation,

Respondent,

Electronically Filed
May 14 2021 02:05 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

NRAP 31(e) SUPPLEMENTAL AUTHORITIES

1. To supplement the argument at pages 4–6 of TitleMax’s Answering Brief that no deference is owed to the FID’s statutory interpretation, *see The Legislature of the State of Nevada, et al. v. The Honorable James A. Settelmeyer et al.*, Case No. 81924, Opinion at pg. 9 n.2 (Nev. May 13, 2021) (“no ... deference” is given to a government branch’s statutory interpretation “when a law’s language is plain, as it is here”).

2. To supplement the argument at pages 6–10 of TitleMax’s Answering Brief that the plain language of NRS 604A does not prohibit or restrict title loan refinancing and that words cannot be read into statutory provisions, *see The Legislature of the State of Nevada, et al. v.*

The Honorable James A. Settlemeyer et al., Case No. 81924, Opinion at pg. 11 (Nev. May 13, 2021) (accepting party’s proffered interpretation “would require us to read language into the provision that it does not contain—a task we will not undertake”).

Dated this 14th day of May, 2021.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Dale Kotchka-Alanes
DANIEL F. POLSENBERG (SBN 2376)
JOEL D. HENRIOD (SBN 8492)
DALE KOTCHKA-ALANES (SBN 13,168)
3993 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169
(702) 949-8200

Attorneys for Respondent

CERTIFICATE OF SERVICE

I certify that on May 14, 2021, I submitted the foregoing document for filing via the Court's eFlex electronic filing system. Electronic notification will be sent to the following:

AARON D. FORD
HEIDI PARRY STERN (SBN 8873)
DAVID J. POPE (SBN 8617)
VIVIENNE RAKOWSKY (SBN 9160)
555 East Washington Avenue, Suite 3900
Las Vegas, Nevada 89101

Attorneys for Appellant

/s/ Jessie M. Helm
An Employee of Lewis Roca Rothgerber Christie LLP