

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

JAMES PARSONS, Individually and  
as Special Administrator for the Estate  
of CAROLYN LEE PARSONS; ANN-  
MARIE PARSONS,

Appellants,

vs.

COLT'S MANUFACTURING  
COMPANY, LLC; COLD DEFENSE  
LLC; DANIEL DEFENSE, INC.;  
PATRIOT ORDINANCE FACTORY;  
FN AMERICA; CHRISTENSEN  
ARMS; LEWIS MACHINE & TOOL,  
LLC; DISCOUNT FIREARMS &  
AMMO, LLC; DF&A HOLDINGS,  
LLC; MAVERICK INVESTMENTS,  
LP; SPORTSMAN'S WAREHOUSE;  
GUNS & GUITARS, INC.,

Respondents.

**Supreme Court No.: 81034**

Electronically Filed  
Jul 29 2020 01:40 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF OF THE**  
**NEVADA JUSTICE ASSOCIATION**  
**(In Support of Appellants)**

The Nevada Justice Association ("NJA") files this motion seeking leave of this Court to file a proposed amicus curiae brief. This motion is made pursuant to NRAP 29(c), and is based upon the following:

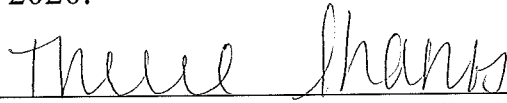
## **I. AMICUS INTEREST AND REASONS FOR FILING THE BRIEF**

NJA is a non-profit organization of independent lawyers in the State of Nevada who represent consumers and share the common goal of improving the civil justice system. NJA seeks to ensure that access to the courts by Nevadans is not diminished. NJA also works to advance the science of jurisprudence, to promote the administration of justice for the public good, and to uphold the honor and dignity of the legal profession.

Through its brief, NJA seeks to provide this Court with the historical contexts behind the particular claims and statutes at issue in these certified questions. Amicus intervention is appropriate where “the amicus has unique information or perspective that can help the Court beyond the help that the lawyers for the parties are able to provide.” *Ryan v. Commodity Futures Trading Comm’n*, 125 F.3d 1062, 1063 (7th Cir. 1997); *see also Miller-Wohl Co. v. Comm’r of Labor & Indus.*, 694 F.2d 203, 204 (9th Cir. 1982) (indicating that the classic role of an amicus curiae is to assist in cases of general public interest and to supplement the efforts of counsel by drawing the Court’s attention to law that may have escaped consideration). Thus, amicus curiae are regularly allowed to appear when they seek to inform the deciding court on matters of historical contexts and legislative history. *See, e.g., Howard Delivery Serv., Inc. v. Zurich Am. Ins. Co.*, 547 U.S. 651, 661 (2006) (considering amicus curiae arguments regarding the legislative

history of a federal statute); *see also* *Contreras Aybar v. Sec'y U.S. Dep't of Homeland Sec.*, 916 F.3d 270, 274 n.1 (3d Cir. 2019) (“Although we do not rest our interpretation of the statute on legislative history, we thank the *amicus curiae* . . . for its thorough and valuable submission on that subject.”). Accordingly, NJA respectfully requests leave to file a proposed *amicus curiae* brief.

Dated this 24<sup>th</sup> day of July, 2020.

  
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- and -

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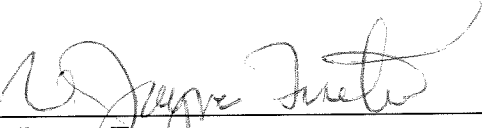
*Attorneys for Amicus Curiae Nevada Justice Association*

## **CERTIFICATE OF SERVICE**

Pursuant to NRAP 25(c), I hereby certify that I am an employee of Robison, Sharp, Sullivan & Brust and that on this date I electronically filed the foregoing **MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF OF THE NEVADA JUSTICE ASSOCIATION** (In Support of Appellants) with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to:

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Dated this 29<sup>th</sup> day of July, 2020.

  
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V. Jayne Ferretto  
An Employee of Robison, Sharp, Sullivan & Brust