

IN THE SUPREME COURT OF THE STATE OF NEVADA

RUTH L. COHEN, AN INDIVIDUAL,

Appellant,

vs.

PAUL S. PADDA, AN INDIVIDUAL;
AND PAUL PADDA LAW, PLLC, A
NEVADA PROFESSIONAL LIMITED
LIABILITY COMPANY,

Respondents.

Case No. 81018

(Consolidated with Case No. 81172)

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Elizabeth A. Brown
Clerk of Supreme Court

MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF OF
CLAGGETT & SYKES LAW FIRM
(In Support of Respondents)

Claggett & Sykes Law Firm (“Claggett & Sykes”), a proposed *amicus curiae*, files this motion seeking leave of this Court to file a proposed amicus curiae brief, which is submitted concurrently with this motion. This motion is made pursuant to NRAP 29(c) and is based upon the following:

Claggett & Sykes principally works on contingency fees and often has fee-splitting agreements with other lawyers. Thus, Claggett & Sykes has a vested interest in the RPC 5.4(a) issues presented in this appeal. That is, Claggett & Sykes presents this amicus brief to have its perspective presented, as well as additional authorities beyond the current briefing. 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, the Court should consider Claggett & Sykes’ perspective in this litigation.

Accordingly, Claggett & Sykes respectfully requests that this Court grant this motion for leave to file its proposed amicus curiae brief.

Dated this 30th day of April 2021.

CLAGGETT & SYKES LAW FIRM

/s/ Micah S. Echols

Sean K. Claggett, Esq.

William T. Sykes, Esq.

Matthew S. Granda, Esq.

Micah S. Echols, Esq.

Attorneys for Amicus Curiae

Claggett & Sykes Law Firm

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF OF CLAGGETT & SYKES LAW FIRM (In Support of Respondents)** was filed electronically with the Nevada Court of Appeals on the 30th day of April 2021. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Appellant—Ruth L. Cohen

Donald J. Campbell (Campbell & Williams)
Philip R. Erwin (Campbell & Williams)
Dale A. Hayes, Jr. (Hayes Wakayama)
Dale A. Hayes (Hayes Wakayama)
Samuel R. Mirkovich (Campbell & Williams)
Liane K. Wakayama (Hayes Wakayama)

Respondents—Paul Padda Law, PLLC & Paul S. Padda

Joel D. Henriod (Lewis Roca Rothgerber Christie LLP/Las Vegas)
Paul S. Padda (Paul Padda Law, PLLC)
Tamara Beatty Peterson (Peterson Baker, PLLC)
Daniel F. Polsenberg (Lewis Roca Rothgerber Christie LLP/Las Vegas)
Ryan A. Semerad (Donald L. Fuller, Attorney at Law, LLC)
Abraham G. Smith (Lewis Roca Rothgerber Christie LLP/Las Vegas)

/s/ Anna Gresl

Anna Gresl, an employee of
Claggett & Sykes Law Firm