

IN THE SUPREME COURT OF THE STATE OF NEVADA

NATHANIEL HELTON, AN
INDIVIDUAL,

Appellant,

vs.

NEVADA VOTERS FIRST PAC, A
NEVADA COMMITTEE FOR
POLITICAL ACTION; TODD L. BICE,
IN HIS CAPACITY AS THE PRESIDENT
OF NEVADA VOTERS FIRST PAC;
AND BARBARA K. CEGAVSKE, IN
HER CAPACITY AS NEVADA
SECRETARY OF STATE,

Respondents,

Case No. 84110

Electronically Filed
Jan 21 2022 05:38 p.m.

Elizabeth A. Brown
Clerk of Supreme Court
**MOTION FOR SUMMARY
ADJUDICATION**

Respondents Nevada Voters First PAC and Todd L. Bice ("Voters First") move this Court for summary adjudication of Plaintiff's appeal of the District Court's Findings of Facts and Conclusions of Law; and Judgment entered on January 6, 2022 (the "Decision"). Plaintiff's challenge below pursuant to NRS 295.061 is something this Court can and should address on the record without further briefing. It is purely a legal matter which the District Court resolved on argument, without consideration of any evidence, as agreed by the parties. Because voter initiatives are time sensitive, Respondents file herewith an appendix of all filings made in the District Court pertaining to its Decision. This Court may review the record and affirm the District Court's Decision. There is no need for delay or further briefing.

DATED this 21st day of January 2022.

PISANELLI BICE PLLC

By: /s/ Todd L. Bice

Todd L. Bice, Esq., #4534

Jordan T. Smith, Esq., #12097

John A. Fortin, Esq., #15221

400 South 7th Street, Suite 300

Las Vegas, Nevada 89101

*Attorneys for Respondents Nevada
Voters First PAC and Todd L. Bice*

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Pisanelli Bice PLLC, and that on the 21st day of January 2022, I electronically filed and served by electronic mail a true and correct copy of the above and foregoing **MOTION FOR SUMMARY**

AJUDICATION to:

Bradley S. Schrager
John Samberg
Eric Levinrad
Wolf, Rifkin, Shapiro, Schulman & Rabkin,
LLP
3773 Howard Hughes Pkwy #590 South
Las Vegas, NV 89169
bschrager@wrslawyers.com
jsamberg@wrslawyers.com
elevinrad@wrslawyers.com
dbravo@wrslawyers.com

Attorneys for Appellant

Craig A. Newby
Deputy Solicitor General
Nevada Office of the Attorney General
555 E. Washington Ave., Ste. 3900
Las Vegas, NV 89101
CNewby@ag.nv.gov

*Attorneys for Respondent State of Nevada ex
rel. Barbara K. Cegavske, in her capacity as
Secretary of State of Nevada*

Marc E. Elias
Spencer McCandless
Elias Law Group LLP
10 G St. NE Suite 600
Washington, DC 20002
melias@elias.law
smccandless@elias.law

Lindsay McAleer
Elias Law Group LLP
1700 Seventh Ave, Suite 2100
Seattle, WA 98101
lmcaleer@elias.law

Attorneys for Appellant

/s/ Shannon Dinkel
An employee of Pisanelli Bice PLLC