

**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 CEGAVSKE, in
her official capacity as NEVADA
SECRETARY OF STATE,

Respondents.

Electronically Filed
May 31 2022 10:10 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

Case No.: 84110
District Court Case No.:
21 OC 001721B

**APPELLANT'S RESPONSE TO MOTION TO CLARIFY
APPELLANT'S NRAP 26.1 DISCLOSURE**

BRADLEY S. SCHRAGER, ESQ. (NSB 10217)
JOHN SAMBERG, ESQ. (NSB 10828)
DANIEL BRAVO, ESQ. (NSB 13078)
ERIC LEVINRAD, ESQ. (*pro hac vice*)
3773 Howard Hughes Parkway, Suite 590 South
Las Vegas, Nevada 89169

MARC E. ELIAS, ESQ. (*pro hac vice*)
SPENCER MCCANDLESS, ESQ. (*pro hac vice*)
ELISABETH FROST, ESQ. (*pro hac vice*)
ELIAS LAW GROUP LLP
10 G St. NE Suite 600
Washington, DC 20002

LINDSAY MCALEER, ESQ. (*pro hac vice*)
ELIAS LAW GROUP LLP
1700 Seventh Ave, Suite 2100
Seattle, WA 98101

Attorneys for Appellant

N.R.A.P. 26.1(a) requires “[e]very attorney for a nongovernmental party ... to ... file a statement identifying all its parent corporations and list[] any publicly held company that owns 10% or more of the party’s stock or state[] that there is no such corporation.” Appellant Nathaniel Helton maintains that there are no persons or entities as described in N.R.A.P. 26.1(a) that must be disclosed.

Respondents’ reliance upon the nonbinding decision in *Nunes v. Lizza*, No. 20-CV-4003-CJW, 2021 WL 7186264 (N.D. Iowa Oct. 26, 2021), is inapplicable. *Nunes* relates to a *discovery* dispute about disclosing the identity of a “real party in interest” in the case; it is not relevant to what information must be included in a N.R.A.P. 26.1(a) disclosure.

DATED this 31st day of May, 2022.

**WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN. LLP**

Bv: /s/ *Bradley S. Schragger*

BRADLEY S. SCHRAGER, ESQ. (NSB 10217)
JOHN SAMBERG, ESQ. (NSB 10828)
DANIEL BRAVO, ESQ. (NSB 13078)
ERIC LEVINRAD, ESQ. (*pro hac vice*)
3773 Howard Hughes Parkway, Suite 590 South
Las Vegas, Nevada 89169

MARC E. ELIAS, ESQ. (*pro hac vice*)
SPENCER MCCANDLESS, ESQ. (*pro hac vice*)
ELISABETH FROST, ESQ. (*pro hac vice*)
(*pro hac vice pending*)
ELIAS LAW GROUP LLP
10 G St. NE Suite 600
Washington, DC 20002

LINDSAY MCALEER, ESQ. (*pro hac vice*)
ELIAS LAW GROUP LLP
1700 Seventh Ave, Suite 2100
Seattle, WA 98101

Attorneys for Appellant

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of May, 2022, a true and correct copy of the **APPELLANT’S RESPONSE TO MOTION TO CLARIFY APPELLANT’S NRAP 26.1 DISCLOSURE** was served upon all counsel of record by electronically filing the document using the Nevada Supreme Court’s electronic filing system:

Craig A. Newby, Esq.
**OFFICE OF THE ATTORNEY
GENERAL**
555 E. Washington Avenue, Suite
#3900
Las Vegas, NV 89101
CNewby@ag.nv.gov

Attorney for Barbara Cegavske

Todd Bice, Esq.
Jordan T. Smith, Esq.
John A. Fortin, Esq.
PISANELLI BICE, PLLC
400 S. 7th Street, Suite 300
Las Vegas, NV 89101
tlb@pisanellibice.com
JTS@pisanellibice.com
JAF@pisanellibice.com

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

By /s/ Dannielle Fresquez
Dannielle Fresquez, an Employee of
WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP