

IN THE SUPREME COURT OF THE STATE OF NEVADA

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HONORABLE CATHERINE RAMSEY
NORTH LAS VEGAS MUNICIPAL
JUDGE,

Electronically Filed
Aug 10 2015 03:58 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

Appellant,

vs.

No. 68450

THE CITY OF NORTH LAS VEGAS;
BARBARA A. ANDOLINA, CITY CLERK
OF NORTH LAS VEGAS; BETTY
HAMILTON; MICHAEL WILLIAM
MORENO; AND BOB BORGENSEN,
INDIVIDUALLY AND AS MEMBERS
OF “REMOVE RAMSEY NOW”,

Respondents.

MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF
IN SUPPORT OF APPELLANT

Pursuant to NRAP 29, the Nevada Judges of Limited Jurisdiction (NJLJ) hereby moves for leave to file an amicus curiae brief in support of appellant in this appeal.

The NJLJ’s interest, and reasons why an amicus brief is desirable

The NJLJ is a voluntary association of Justice Court and Municipal Court judges from throughout Nevada. The NJLJ’s mission is to provide the highest quality of service by limited jurisdiction judges in Nevada. The organization strives to ensure that limited jurisdiction judges practice in a fair and efficient manner—resolving disputes by interpreting and applying the law correctly, and by

being consistent and impartial in protecting the rights and liberties of those who appear in our courts. The NJLJ and its members work to strengthen and protect the rights of individuals, preserve communities, and inspire public confidence in the judiciary.

The NJLJ also provides education and lobbying activities for limited jurisdiction judges. The organization meets at least twice yearly for judicial education; and the organization participates in the Nevada Judicial Leadership Summit held every four years.

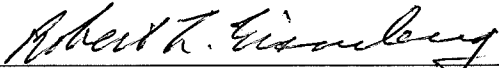
The NJLJ believes the present case will have a serious impact on judges and on the sound administration of justice throughout Nevada, including judges in limited jurisdiction courts. This appeal involves an issue of significant importance to judges regarding the availability of recall elections to remove sitting judges from office. This important issue deals with the interpretation and application of Constitutional provisions dealing with judges, and the extent to which Constitutional provisions conflict with each other and must be harmonized.

The NJLJ and other associations of judges, such as the Nevada District Judges' Association, have filed amicus briefs in cases where this court's decision might have a material impact on the judges and on the sound administration of justice. *E.g.*, *City of Sparks v. Sparks Mun. Court*, 129 Nev. ___, 302 P.3d 1118 (2013); *Landreth v. Malik*, 127 Nev. ___, 251 P.3d 163 (2011); *In re Mosley*, 120 Nev. 908, 102 P.3d 555 (2004).

The NJLJ believes that the interests of justice and the promotion of sound judicial administration will be served by this court receiving input from the NJLJ, as amicus curiae, to assist the court in its decision regarding potential recall of judges. The court granted permission for the present motion and the NJLJ's brief to be submitted by August 14, 2015. The short proposed amicus curiae brief is being lodged contemporaneously with the filing of this motion.

Accordingly, the NJLJ respectfully requests the court to permit the brief to be filed pursuant to NRAP 29.

DATED: Aug. 10, 2015


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*ATTORNEYS FOR NEVADA JUDGES OF
LIMITED JURISDICTION*

1 CERTIFICATE OF SERVICE

2
3 I certify that I am an employee of Lemons, Grundy & Eisenberg and that on this date the
4 foregoing Motion was filed electronically with the Clerk of the Nevada Supreme Court, and
5 therefore electronic service was made in accordance with the master service list as follows:

6 Dominic Gentile
7 Richard Gordon
8 Colleen McCarty
9 Craig Mueller
10 Daniel Ivie
11 Patrick Byrne

12 I further certify that on this date I served copies of this motion, postage prepaid, by U.S.
13 mail to:

14 Steven Goldstein
15 Mueller Hinds & Associates
16 600 S. Eighth Street
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18 Ross Miller
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23 DATED: 8/10/15

24 William Stogin
25
26
27
28