

IN THE SUPREME COURT OF NEVADA

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Elizabeth A. Brown
Clerk of Supreme Court

NAUTILUS INSURANCE COMPANY,)
)
Appellant,)
)
vs.)
)
ACCESS MEDICAL, LLC; FLOURNOY)
MANAGEMENT LLC; AND)
ROBERT CLARK WOOD, II)
)
Respondents.)
)
)
)

**MOTION OF COMPLEX INSURANCE CLAIMS LITIGATION
ASSOCIATION AND AMERICAN PROPERTY CASUALTY INSURANCE
ASSOCIATION FOR LEAVE TO FILE AMICUS CURIAE BRIEF IN
ANSWER TO RESPONDENT’S PETITION FOR REHEARING**

The Complex Insurance Claims Litigation Association (“CICLA”) and American Property Casualty Insurance Association (“APCIA”) hereby move for leave to submit a short, 8-page amicus curiae brief in answer to Respondent’s Petition for Rehearing. CICLA and APCIA, who are trade associations of major property and casualty insurance companies, collectively represent over a thousand insurers across the country. The Amicus have been permitted to participate in prior briefing and argument of in recognition of the fact that this case will have an

extraordinary and outsized impact on insurers, and the insurance system in Nevada. Amici seek to appear to file a short answering brief in order to address misnomers in Respondent's petition regarding the insurance policy terms, and to demonstrate that, contrary to Respondent's contentions, both the law and public policy support restitution in this setting. Amici will demonstrate that restitution is fair to both the insurer and insured, and supports Nevada's interests in a strong and stable insurance system.

DATED this 19th day of April, 2021.

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CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2021, I submitted the foregoing “**AMICUS CURIAE MOTION FOR LEAVE TO FILE BRIEF IN ANSWER TO RESPONDENT’S PETITION FOR REHEARING**” for filing *via* the court’s eFlex electronic filing system. Electronic notification will be sent to the following:

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I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, at Las Vegas, Nevada, addressed as follows:

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