

HOLLAND & HART LLP
Abraham G. Smith (NSBN 13250)
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134
Tel: (702) 669-4600
Fax: (702) 920-8118
agsmith@hollandhart.com

HOLLAND & HART LLP
Christopher M. Jackson (*pro hac vice pending*)
555 17th Street, Suite 3200
Denver, Colorado 80202
Tel: (303) 295-8000
cmjackson@hollandhart.com

Attorneys for Plaintiffs

**FIRST JUDICIAL DISTRICT COURT OF NEVADA
CARSON CITY**

NATIONAL TAXPAYERS UNION, a non-
profit organization, and ROBIN L. TITUS,
MD,

Plaintiffs,

v.

THE STATE OF NEVADA, ex, rel., JOSEPH
LOMBARDO, in his official capacity as
Governor of the State of Nevada; ZACH
CONINE, in his official capacity as Nevada
State Treasurer; RICHARD WHITLEY, in his
official capacity as Director of the Nevada
Department of Human Services; STACIE
WEEKS, in her official capacity as Director of
the Nevada Health Authority; NED GAINES,
in his official capacity as the Acting Nevada
Commissioner of Insurance; and JANEL
DAVIS, in her official capacity as Acting
Executive Director of the Silver State Health
Insurance Exchange,

Defendants.

Case No. 25 OC 00109 1B

Dept. No. 1

CASE APPEAL STATEMENT

1. Name of appellants filing this case appeal statement:

Nevada Taxpayers Union

Robin L. Titus, MD

REC'D & FILED

2025 NOV 20 PM 3: 59

WILLIAM SCOTT HOEN
CLERK

BY  CLERK
DEPUTY

1 2. Identify the judge issuing the decision, judgment, or order appealed from:

2 Honorable Judge Jason Woodbury

3
4 3. Identify each appellant and the name and address of counsel for each appellant. If an
5 appellant is self-represented, identify the name and address of appellant:

6 Attorneys for appellants:

7 HOLLAND & HART LLP
8 Abraham G. Smith (NSBN 13250)
9 9555 Hillwood Drive, 2nd Floor
10 Las Vegas, Nevada 89134
11 Tel: (702) 669-4600
12 Fax: (702) 920-8118
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17 Denver, Colorado 80202
18 Tel: (303) 295-8000
19 cmjackson@hollandhart.com

20 4. Identify each respondent and the name and address of appellate counsel, if known, for each
21 respondent (if the name of a respondent's appellate counsel is unknown, indicate as much and
22 provide the name and address of that respondent's trial counsel). For self-represented respondents,
23 identify the name and address of each respondent.

24 Attorneys for Respondents:

25 Jeffrey M. Conner (NSBN 11543)
26 Chief Deputy Solicitor General
27 State of Nevada
28 Office of the Attorney General
100 North Carson Street
Carson City, Nevada 89701-4717
Tel: (775) 684-1136
jconner@ag.nv.gov

5. Indicate whether any attorney identified above in response to question 3 or 4 is not licensed
to practice law in Nevada and, if so, whether the district court granted that attorney permission to
appear under SCR 42 (attach a copy of any district court order granting such permission):

1 The motion to associate Christopher M. Jackson *pro hac vice*, filed September 22, 2025,
2 remains pending.

3
4 6. If appellant was represented by counsel in the district court, indicate whether counsel was
5 appointed or retained.

6 Retained

7
8 7. If appellant is represented by counsel on appeal, is counsel appointed or retained.

9 Retained

10
11 8. Has appellant been granted leave to proceed in forma pauperis?

12 ☐ Yes: Identify the date of entry of the district court order granting such leave and
13 attach a copy of the order:

14 ☒ No: Has appellant filed an application to proceed in forma pauperis?

15 ☒ No.

16 ☐ Yes: identify date the application was filed:

17 If application was denied, indicate date of order denying and attach copy
18 of the order:

19 N/A

20
21 9. Indicate the date the proceedings commenced in the district court (e.g., date complaint,
22 indictment, information, or petition was filed):

23 July 7, 2025

24
25 10. Provide a brief description of the nature of the action and result in the district court,
26 including the type of judgment or order being appealed and the relief granted by the district court.

1 This action challenges the legality of (1) SB 420 (2021) enacting a public option for
2 Nevada health-insurance plans, and (2) guidance letters addressing revisions to
3 premium-reduction targets. Plaintiffs allege that SB 420 violates Nev. Const. art. IV,
4 § 18(2); art. IV, § 19; and art. III, § 1; Plaintiffs also allege that the guidance letters
5 violate the Nevada Administrative Procedure Act (NRS chapter 233B). On November
6 3, 2025, the district court granted defendants' motion to dismiss plaintiffs' amended
7 complaint for lack of standing and denied as moot plaintiffs' amended motion for
8 preliminary injunction.
9

10 11. Indicate whether the case has previously been the subject of an appeal to or original
11 writ proceeding in the Supreme Court of Court of Appeals and, if so, the caption and appellate
12 court docket number of the prior proceeding:

13 N/A
14

15 12. Does this appeal raise issues involving child custody, the guardianship or a minor,
16 parenting time, or visitation?

17 ☐ Yes: Is this the primary issue on appeal? ☐ Yes ☐

18 No

19 ☒ No
20

21 13. If this is a civil case, indicate whether this appeal involves the possibility of
22 settlement:

23 Yes.
24
25
26
27
28

1 DATE: November 19, 2025

2 HOLLAND & HART LLP

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4
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7 Las Vegas, Nevada 89134
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9 Fax: (702) 920-8118

10 Christopher M. Jackson (*pro hac vice pending*)
11 555 17th Street, Suite 3200
12 Denver, Colorado 80202
13 Tel: (303) 295-8000
14 Fax: (303) 295-8261

15 *Attorneys for Plaintiffs*

1 **CERTIFICATE OF SERVICE**

2 I, Cathy Ryle, certify:

3 I am employed in the City of Reno, County of Washoe, State of Nevada by the law offices of
4 Holland & Hart LLP. My business address is 5470 Kietzke Lane, Suite 100, Reno, Nevada
89511. I am over the age of 18 years and not a party to this action.

5 On November 19, 2025, I caused the foregoing **CASE APPEAL STATEMENT**, to be served
6 by the following methods(s):

7 ☒ U.S. Mail: A true and correct copy was placed in Holland & Hart LLP's outgoing mail in
a sealed envelope addressed as follows:

8 Jeffrey M. Conner (NSBN 11543)
9 Chief Deputy Solicitor General
10 State of Nevada
11 Office of the Attorney General
12 100 North Carson Street
Carson City, Nevada 89701-4717
Tel: (775) 684-1136
jconner@ag.nv.gov

13 ☒ E-Mail: By e-mailing a true copy thereof to the following person(s) at the following e-
14 mail addresses, pursuant to NRCP 5(b)(F):

15 Jeffrey M. Conner (NSBN 11543)
16 Chief Deputy Solicitor General
jconner@ag.nv.gov

17 
18 _____
An Employee of Holland & Hart LLP

HOLLAND & HART LLP
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LAS VEGAS, NEVADA 89134