



1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. STATEMENT OF FACTS**

3 In response to the facts set forth in the moving party’s Motion for Summary Judgment,  
4 [ ] Plaintiff [ ] Defendant provides the following statement of facts:

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21 **II. STANDARD FOR SUMMARY JUDGMENT**

22 JCRCP 56(c) states in relevant part that “[t]he judgment sought shall be rendered  
23 forthwith if the pleadings, depositions, answers to interrogatories, and admissions on file,  
24 together with the affidavits, if any, show that there is no genuine issue as to any material fact and  
25 that the moving party is entitled to a judgment as a matter of law.” The party moving for  
26 summary judgment bears the initial burden or production to show the absence of a genuine issue  
27 of material fact. *Cuzze v. University & Comm. College System of Nevada*, 172 P.3d 131 (Nev.  
28 2007).



1 **CONCLUSION**

2 For the reasons stated above, the Court should deny the pending Motion for Summary  
3 Judgment.

4 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

5 Pursuant to NRS 53.045, I declare under penalty of  
6 perjury that the foregoing is true and correct.

7 \_\_\_\_\_  
8 [ ] Plaintiff [ ] Defendant, *Pro Se*

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10 **CERTIFICATE OF MAILING**

11 I HEREBY CERTIFY that on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, I  
12 placed a true and correct copy of the foregoing **OPPOSITION TO MOTION FOR**  
13 **SUMMARY JUDGMENT** in the United States Mail at Las Vegas, Nevada, with first-class  
14 postage prepaid, addressed to the following:

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16 \_\_\_\_\_  
17 \_\_\_\_\_  
18 \_\_\_\_\_

19 Pursuant to NRS 53.045, I declare under penalty of  
20 perjury that the foregoing is true and correct.

21 \_\_\_\_\_  
22 [ ] Plaintiff [ ] Defendant, *Pro Se*

