

REC'D & FILED

2025 FEB -7 PM 3:29

WILLIAM SCOTT HOEN  
CLERK

BY

DEPUTY

1 W. Chris Wicker [NSB No. 1037]  
2 Jose A. Tafoya [NSB No. 16011]  
3 WOODBURN AND WEDGE  
4 6100 Neil Road, Suite 500  
5 Reno, NV 89511-1149  
6 Tel: (775) 688-3000 | Fax: (775) 688-3088  
7 [wwicker@woodburnandwedge.com](mailto:wwicker@woodburnandwedge.com)  
8 [jtafoya@woodburnandwedge.com](mailto:jtafoya@woodburnandwedge.com)

9 MAYER BROWN LLP  
10 Lee Rubin (*pro hac vice* pending)  
11 Two Palo Alto Square, Suite 300  
12 3000 El Camino Real  
13 Palo Alto, CA 94306-2112  
14 (650) 331-2000  
[lrubin@mayerbrown.com](mailto:lrubin@mayerbrown.com)

15 Rachel J. Lamorte (*pro hac vice* pending)  
16 1999 K Street, NW  
17 Washington, DC 20006-1101  
18 (202) 263-3000  
[rlamorte@mayerbrown.com](mailto:rlamorte@mayerbrown.com)

19 Robert C. Double III (*pro hac vice* pending)  
20 333 South Grand Avenue, 47th Floor  
21 Los Angeles, CA 90071  
22 (213) 229-9500  
[rdouble@mayerbrown.com](mailto:rdouble@mayerbrown.com)

23 FREE SPEECH FOR PEOPLE  
24 Amira Mattar (*pro hac vice* pending)  
25 John Bonifaz (*pro hac vice* pending)  
26 Courtney Hostetler (*pro hac vice* pending)  
27 48 N. Pleasant Street, Suite 304  
28 Amherst, MA 01002  
(617) 244-0234

29 *Attorneys for Intervenor-Defendant NAACP*  
30 *Tri-State Conference of Idaho-Nevada-Utah*

31 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

32 **IN AND FOR CARSON CITY**

33 ZENAIDA DAGUSEN, an individual;  
34 REPUBLICAN NATIONAL COMMITTEE;  
35 NEVADA REPUBLICAN PARTY; and  
36 DONALD J. TRUMP FOR PRESIDENT 2024,  
37 INC.

38 Plaintiffs,

39 Case No.: 24-OC-001531B

40 Dept. No.: 1

41 *vs.*

1 FRANCISCO AGUILAR, in his official  
2 capacity as Nevada Secretary of State;  
3 DEMOCRATIC NATIONAL COMMITTEE;  
4 and NEVADA STATE DEMOCRATIC  
5 PARTY,

6 Defendants,

7 and

8 NAACP Tri-State Conference of Idaho-  
9 Nevada-Utah,

10 Defendant-Intervenor.

---

11 **MOTION TO ASSOCIATE COUNSEL**

12 Defendant-Intervenor NAACP Tri-State Conference of Idaho-Nevada-Utah hereby moves  
13 the Court for an order permitting **Courtney Marie Hostetler, Esq.** to practice in Nevada pursuant  
14 to Nevada Supreme Court Rule 42 (SCR 42). This motion is supported by the attached “Verified  
15 Application for Association of Counsel” (**Exhibit A**), “Certificates of Good Standing” from  
16 Massachusetts (**Exhibit B**), and the State Bar of Nevada Statement (**Exhibit C**). A proposed Order  
17 Admitting to Practice is attached hereto as **Exhibit D**.

18 Affirmation Pursuant to NRS 239B.030

19 The undersigned does hereby affirm that the *Motion to Associate Counsel* does not contain  
20 the social security number of any person.

21 Dated this 7 day of February, 2025.

22 WOODBURN AND WEDGE



23  
24 W. Chris Wicker [NSB No. 1037]  
25 Jose A. Tafoya [NSB No. 16011]  
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20 [amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)

21 [jbonifaz@freespeechforpeople.org](mailto:jbonifaz@freespeechforpeople.org)

22 [chostetler@freespeechforpeople.org](mailto:chostetler@freespeechforpeople.org)

23 *Attorneys for Intervenor-Defendant*

24 *NAACP Tri-State Conference of Idaho-Nevada-*

25 *Utah*

26  
27  
28

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**INDEX OF EXHIBITS**

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B	Certificates of Good Standing	1
C	State Bar of Nevada Statement Pursuant to Supreme Court Rule 42(3)(b)	2
D	Proposed Order Admitting to Practice	3

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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of Woodburn and Wedge, and that on the below date, I caused a true and correct copy of the *Motion to Associate Counsel* to be served via Electronic-Mail, to the following:

Brian R. Hardy, Esq.  
Harry L. Arnold, Esq.  
MARQUIS AURBACH  
10001 Park Run Drive  
Las Vegas, NV 89145  
[bhardy@maclaw.com](mailto:bhardy@maclaw.com)  
[harnold@maclaw.com](mailto:harnold@maclaw.com)  
*Attorneys for Plaintiffs*

Bradley S. Schrager, Esq.  
Daniel Bravo, Esq.  
BRAVO SCHRAGER LLP  
6675 S. Tenaya Way, Ste. 200  
Las Vegas, NV 89113  
[bradley@bravoschrager.com](mailto:bradley@bravoschrager.com)  
[daniel@bravoschrager.com](mailto:daniel@bravoschrager.com)

Laena St Jules, Esq.  
Senior Deputy Attorney General  
100 N. Carson St.  
Carson City, NV 89701  
[lstjules@ag.nv.gov](mailto:lstjules@ag.nv.gov)

David R. Fox, Esq.  
ELIAS LAW GROUP LLP  
250 Massachusetts Ave. NW, Ste. 400  
Washington, D.C. 20001  
[dfox@elias.law](mailto:dfox@elias.law)

*Attorneys for Defendant Francisco V Aguilar*

*Attorneys for Defendants Democratic National Committee and Nevada State Democratic Party*

DATED this 7<sup>th</sup> day of February, 2025.



Mele D. Puletau  
An employee of Woodburn and Wedge

**EXHIBIT “A”**

**EXHIBIT “A”**

## **Suzy Moore**

---

**From:** SBN Website <noreply@nvbar.org>  
**Sent:** Tuesday, December 24, 2024 6:56 PM  
**To:** Prohac; Suzy Moore; Mary Jorgensen  
**Subject:** New Pro Hac Submission

A new pro hac application has been submitted.

### **Case Information**

#### **Name of Court**

First Judicial District Court

#### **Case No.**

24-OC-001531B

#### **Dept. No.**

1

#### **Plaintiff**

Zenaida Dagusen; Republican National Committee; Nevada Republican Party; and Donald J. Trump for President 2024, Inc.

#### **Defendant**

Francisco Aguilar in his official capacity as Nevada Secretary of State; Democratic National Committee; Nevada State Democratic Party

### **Petitioner Information**

#### **Name - First, Middle, Last, Suffix**

Courtney Marie Hostetler

#### **Petitioner is an attorney at law and a member of the law firm: (enter firm name)**

Free Speech For People

#### **Firm Address**

28 S. Main St.  
Suite 200  
Sharon, Massachusetts 02067  
United States  
[Map It](#)

#### **Telephone No. xxx-xxx-xxxx**

617-249-3015

#### **Petitioner's Email**

[chostetler@freespeechforpeople.org](mailto:chostetler@freespeechforpeople.org)

**Petitioner has been retained personally or as a member of the above named law firm to provide legal representation in connection with the above-named matter by:**

NAACP Tri-State Conference of Idaho-Nevada-Utah

Select all state(s) in which you are an attorney in good standing and regularly practice law. Hold ctrl key to select multiple states. The highlight lines may disappear but the data will be saved.

- Massachusetts

Upload Certificate(s) of Good Standing, from each state, issued within the past 30 days; do not include certificates from federal courts. If your certificate was emailed to you from your bar or Supreme Court, include the email.

- CGS-MA-Dec2024.pdf

List the court(s) and other state(s) to which you have been ADMITTED to practice AND the date of admission for each.

U.S. Supreme Court, 11/21/2022  
U.S. Court of Appeals for the First Circuit, 04/12/2024  
U.S. Court of Appeals for the Third Circuit, 09/2023  
U.S. Court of Appeals for the Fifth Circuit, 10/08/2020  
U.S. Court of Appeals for the Sixth Circuit, 09/11/2023  
U.S. Court of Appeals for the Eighth Circuit, 09/07/2023  
U.S. Court of Appeals for the Ninth Circuit, 11/22/2023  
U.S. District Court for the District of Colorado, 03/03/2022  
U.S. District Court for the District of Columbia, 04/04/2024  
U.S. District Court for the District of Massachusetts, 03/17/2015

Is Petitioner currently suspended or disbarred in any court?

No

Has Petitioner ever received discipline including, but not limited to, suspension or disbarment, by any organization with the authority to discipline attorneys at law? If yes, provide details below.

No

Has Petitioner ever had any certificate or privilege to appear and practice before any regulatory administrative body suspended or revoked?

No

Has Petitioner, either by resignation, withdrawal, or otherwise, ever terminated or attempted to terminate Petitioner's office as an attorney in order to avoid discipline, disbarment or suspension proceedings?

No

Has Petitioner filed an application under Nevada SCR 42 in the past three years?

No prior applications have been submitted in the past three years by petitioner.

#### Nevada Counsel Information

Name - First, Middle, Last, Suffix

W. Chris Wicker

Nevada Counsel Bar No.

1037

#### Firm Information

Woodburn and Wedge  
6100 Neil Road, Suite 500  
Reno, Nevada 89511-1159  
United States  
[Map It](#)

Telephone No. xxx-xxx-xxxx

775-688-3000

**Nevada Counsel Email**

[wwicker@woodburnandwedge.com](mailto:wwicker@woodburnandwedge.com)

**Petitioner agrees to comply with the provisions of Nevada SCR 42(3) and (13) and Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada in accordance with provisions as set forth in SCR 42(3) and (13). Petitioner respectfully requests that Petitioner be admitted to practice in the above-entitled court for the purposes of this matter only.**

- I agree

**Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.**

- I agree

**Petitioner Affirmations**

- I am the Petitioner in the above-entitled matter.
- I hereby swear and affirm under penalty of perjury that the assertions of this application are true.
- I have received a copy of, read, and will adhere to the Nevada Creed of Professionalism and Civility available on the instruction page.
- I have read Supreme Court Rule (SCR) 42 and meet all requirements contained therein.
- I am not a licensee of the State Bar of Nevada.
- I am not a resident of the state of Nevada.
- I am not regularly employed as a lawyer in the state of Nevada.
- I am not engaged in substantial business, professional, or other activities in the state of Nevada.
- I am a member in good standing and eligible to practice before the bar of any jurisdiction of the United States.
- I have associated a lawyer who is an active licensee in good standing of the State Bar of Nevada as counsel of record in this action or proceeding.
- I have read the foregoing application and know the contents thereof; that the same is true of my own knowledge except as to those matters therein stated on information and belief; and as to the matter I believe them to be true.
- I further certify that I am subject to the jurisdiction of the Courts and disciplinary boards of this state with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.
- I understand and shall comply with the standards of professional conduct required by members of the State Bar of Nevada;
- I am subject to the disciplinary jurisdiction to the State Bar of Nevada with respect to any of my actions occurring in the course of such appearance.
- The accompanying certificate(s) of standing are copies of original documents which are in my possession.
- I understand the fee paid for this application is non-refundable.

•

**I understand that by typing my name and clicking "Submit", I am electronically signing this document.**

- I understand and agree.

•

**Typed Signature**

Courtney Hostetler

**Date Submitted**

12/24/2024

**Payment Method**

**Credit Card****Credit Card**

American Express  
XXXXXXXXXXXX1129

**Billing Address**

48 N. Pleasant St., Suite 304  
Amherst, Massachusetts 01002  
[Map It](#)

**Order**

Product	Qty	Unit Price	Price
<b>Standard Processing \$550 (7 - 14 days)</b>	1	\$550.00	\$550.00
<b>Sub Total</b>			<b>\$550.00</b>
<b>Total</b>			<b>\$550.00</b>



# State Bar of Nevada

## Pro Hac Application - Nevada Counsel Consent to Associate : Entry # 35664

### DESIGNATION, CERTIFICATION AND CONSENT OF NEVADA COUNSEL

#### Nevada Counsel Name - First, Middle, Last, Suffix

W. Chris Wicker

#### Nevada Counsel Bar No.

1037

#### Nevada Counsel Email

[wwicker@woodburnandwedge.com](mailto:wwicker@woodburnandwedge.com)

#### Petitioner/Out-of-State Counsel Name

Courtney Hostetler

#### Petitioner/Out-of-State Counsel Email

[chostetler@freespeechforpeople.org](mailto:chostetler@freespeechforpeople.org)

#### Case No.

24-OC-001531B

#### SCR 42(14) Responsibilities of Nevada Attorney of Record

**The Nevada attorney of record shall be responsible for and actively participate in the representation of a client in any proceeding that is subject to this rule.**

I agree

**The Nevada attorney of record shall be present at all motions, pre-trials, or any matter in open court unless otherwise ordered by the court.**

# Pro Hac Application - Nevada Counsel Consent to Associate : Entry # 35664

I agree

**The Nevada attorney of record shall be responsible to the court, arbitrator, mediator, or administrative agency or governmental body for the administration of any proceeding that is subject to this rule and for compliance with all state and local rules of practice. It is the responsibility of the Nevada counsel to ensure that the proceeding is tried and managed in accordance with all applicable Nevada procedural and ethical rules.**

I agree

**I hereby agree to associate with Petitioner referenced above and further agree to perform all duties and responsibilities as required by Nevada Supreme Court Rule 42.**

I agree

**I understand that by typing my name and clicking "Submit", I am electronically signing this document.**

- I understand and agree.

## Typed Signature

W. Chris Wicker

## Date Submitted

01/13/2025

**EXHIBIT “B”**

**EXHIBIT “B”**

# COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

---

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on **May 3, 2012**,  
said Court being the highest Court of Record in said Commonwealth:

**Courtney Marie Hostetler**

---

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court\*.

In testimony whereof, I have hereunto set my hand and affixed the

seal of said Court, this **twentieth** day of **December**  
in the year of our Lord **two thousand and twenty-four**.



---

MAURA S. DOYLE, Clerk

\* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification. X3116.

**EXHIBIT “C”**

**EXHIBIT “C”**

1 STAT

2

3 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
IN AND FOR THE COUNTY OF CARSON CITY

4 Case No. 24-OC-001531B  
5 Dept. No. 1

6 Zenaide Dagusen, Republic  
7 National Committee

8 vs.

9 Francisco Aguilar, Democratic  
10 National Committee

11

12 STATE BAR OF NEVADA STATEMENT PURSUANT TO SUPREME COURT RULE  
42 (3) (b)

13

14 THE STATE BAR OF NEVADA, in response to the application of  
Petitioner, submits the following statement pursuant to SCR42(3):

15 SCR42(6)**Discretion**. The granting or denial of a motion to associate  
16 counsel pursuant to this rule by the court is discretionary. The  
court, arbitrator, mediator, or administrative or governmental  
17 hearing officer may revoke the authority of the person permitted to  
appear under this rule. Absent special circumstances, repeated  
18 appearances by any person or firm of attorneys pursuant to this rule  
shall be cause for denial of the motion to associate such person.

20 (a) **Limitation**. It shall be presumed, absent special  
21 circumstances, and only upon showing of good cause, that  
more than 5 appearances by any attorney granted under  
22 this rule in a 3-year period is excessive use of this  
rule.

23 (b) **Burden on applicant**. The applicant shall have the  
24 burden to establish special circumstances and good cause  
for an appearance in excess of the limitation set forth  
in subsection 6(a) of this rule. The applicant shall set  
forth the special circumstances and good cause in an  
affidavit attached to the original verified application.

25

26 1. DATE OF APPLICATION: 12/24/2024

27

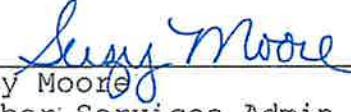
28 2. APPLYING ATTORNEY: Courtney Marie Hostetler, Esq.

1  
2 3. FIRM NAME AND ADDRESS: Free Speech For People, 28 S. main  
Street, Suite 200, Sharon, MA 2067

3  
4 4. NEVADA COUNSEL OF RECORD: Walter Chris Wicker, Esq., Woodburn  
and Wedge, 6100 Neil Road, Suite 500, Reno, NV 89511

5  
6 5. There is no record of previous applications for appearance by  
petitioner within the past three (3) years.

7  
8 DATED this January 21, 2025

9  
10   
11 Suzy Moore  
12 Member Services Admin.  
13 Pro Hac Vice Processor  
14 STATE BAR OF NEVADA

**EXHIBIT “D”**

**EXHIBIT “D”**

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6 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

7 **IN AND FOR CARSON CITY**

8 ZENAIDA DAGUSEN, an individual;  
9 REPUBLICAN NATIONAL COMMITTEE;  
10 NEVADA REPUBLICAN PARTY; and  
11 DONALD J. TRUMP FOR PRESIDENT  
12 2024, INC.

Case No.: 24-OC-001531B

Dept. No.: 1

13 Plaintiffs,

v.

14 FRANCISCO AGUILAR, in his official  
15 capacity as Nevada Secretary of State;  
16 DEMOCRATIC NATIONAL  
17 COMMITTEE; and NEVADA STATE  
18 DEMOCRATIC PARTY,

Defendants,

and

NAACP Tri-State Conference of Idaho-  
20 Nevada-Utah,

Defendant-Intervenor.

21  
22 **ORDER ADMITTING TO PRACTICE**

23  
24 Currently before this Court is a *Motion to Associate Counsel* ("Motion") filed by  
25 Intervenor-Defendant NAACP Tri-State Conference of Idaho-Nevada-Utah ("Intervenor-  
26 Defendant") on February 7, 2025. Intervenor-Defendant requests an Order from this Court  
27 permitting COURTNEY HOSTETLER, ESQ. to practice in Nevada pursuant to Nevada Supreme  
28 Court Rule 42. Intervenor-Defendant's Motion was accompanied with a Verified Application for

1 Association of Counsel (Exhibit A), a Certificate of Good Standing for the state of Massachusetts  
2 (Exhibit B), and the State Bar of Nevada Statement (Exhibit C). Having reviewed the papers and  
3 pleadings on file herein and applicable law, this Court finds good cause to grant the Motion.

4 Based upon the foregoing and good cause appearing,

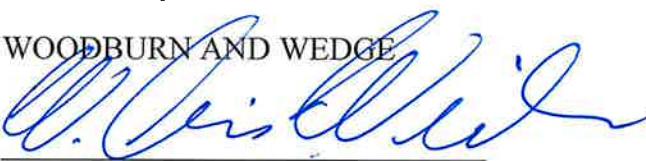
5 **IT IS HEREBY ORDERED** that Intervenor-Defendant's *Motion to Associate Counsel* is  
6 **GRANTED.**

7 **IT IS HEREBY FURTHER ORDERED** that **COURTNEY HOSTETLER, ESQ.** is  
8 hereby admitted to practice in the above-entitled Court on behalf of Intervenor-Defendant for the  
9 purposes of the above-entitled matter only.

10 Dated this \_\_\_\_\_ day of \_\_\_\_\_ 2025.

11  
12  
13 Submitted by:

14 WOODBURN AND WEDGE



15  
16 DISTRICT COURT JUDGE

17 W. Chris Wicker [NSB No. 1037]  
18 Jose A. Tafoya [NSB No. 16011]  
19 6100 Neil Road, Suite 500  
Reno, NV 89511-1149  
Tel: (775) 688-3000 | Fax: (775) 688-3088  
[wwicker@woodburnandwedge.com](mailto:wwicker@woodburnandwedge.com)  
[jtafoya@woodburnandwedge.com](mailto:jtafoya@woodburnandwedge.com)

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10 [chostetler@freespeechforpeople.org](mailto:chostetler@freespeechforpeople.org)  
11 *Attorneys for Intervenor-Defendant NAACP Tri-State*  
12 *Conference of Idaho-Nevada-Utah*

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