

REC'D & FILED

2025 FEB -7 PM 3: 29

WILLIAM SCOTT HOEN
CLERK

BY  DEPUTY

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

5
6 MAYER BROWN LLP
Lee Rubin (*pro hac vice* pending)
Two Palo Alto Square, Suite 300
7 3000 El Camino Real
Palo Alto, CA 94306-2112
8 (650) 331-2000
lrubin@mayerbrown.com
9 Rachel J. Lamorte (*pro hac vice* pending)
1999 K Street, NW
10 Washington, DC 20006-1101
(202) 263-3000
rlamorte@mayerbrown.com
11 Robert C. Double III (*pro hac vice* pending)
333 South Grand Avenue, 47th Floor
12 Los Angeles, CA 90071
(213) 229-9500
13 rdouble@mayerbrown.com

14
15 FREE SPEECH FOR PEOPLE
Amira Mattar (*pro hac vice* pending)
16 John Bonifaz (*pro hac vice* pending)
Courtney Hostetler (*pro hac vice* pending)
17 48 N. Pleasant Street, Suite 304
Amherst, MA 01002
18 (617) 244-0234

19
20 *Attorneys for Intervenor-Defendant NAACP*
Tri-State Conference of Idaho-Nevada-Utah

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

22 **IN AND FOR CARSON CITY**

23
24 ZENAIDA DAGUSEN, an individual;
REPUBLICAN NATIONAL COMMITTEE;
25 NEVADA REPUBLICAN PARTY; and
DONALD J. TRUMP FOR PRESIDENT 2024,
26 INC.

Plaintiffs,

27 vs.
28

Case No.: 24-OC-001531B

Dept. No.: 1

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**

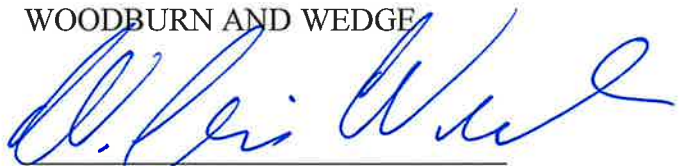
12 Defendant-Intervenor NAACP Tri-State Conference of Idaho-Nevada-Utah hereby moves
13 the Court for an order permitting **Courtney Marie Hostetler, Esq.** to practice in Nevada pursuant
14 to Nevada Supreme Court Rule 42 (SCR 42). This motion is supported by the attached “Verified
15 Application for 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 W. Chris Wicker [NSB No. 1037]
24 Jose A. Tafoya [NSB No. 16011]
25 6100 Neil Road, Suite 500
26 Reno, NV 89511-1149

27 MAYER BROWN LLP
28 Lee Rubin (*pro hac vice* pending)
Two Palo Alto Square, Suite 300
3000 El Camino Real

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Palo Alto, CA 94306-2112
lrubin@mayerbrown.com
Rachel J. Lamorte (*pro hac vice* pending)
1999 K Street, NW
Washington, DC 20006-1101
(202) 263-3000
rlamorte@mayerbrown.com
Robert C. Double III (*pro hac vice* pending)
333 South Grand Avenue, 47th Floor
Los Angeles, CA 90071
(213) 229-9500
rdouble@mayerbrown.com

FREE SPEECH FOR PEOPLE
Amira Mattar (*pro hac vice* pending)
John Bonifaz (*pro hac vice* pending)
Courtney Hostetler (*pro hac vice* pending)
48 N. Pleasant Street, Suite 304
Amherst, MA 01002
(617) 244-0234
amira@freespeechforpeople.org
jbbonifaz@freespeechforpeople.org
chostetler@freespeechforpeople.org

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

INDEX OF EXHIBITS

<u>Exhibit</u>	<u>Description</u>	<u>Pages</u>
A	Verified Application for Association of Counsel	6
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

1 **CERTIFICATE OF SERVICE**

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

5 Brian R. Hardy, Esq.
6 Harry L. Arnold, Esq.
7 MARQUIS AURBACH
8 10001 Park Run Drive
9 Las Vegas, NV 89145
10 bhardy@maclaw.com
11 harnold@maclaw.com
12 *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
daniel@bravoschrager.com

10 Laena St Jules, Esq.
11 Senior Deputy Attorney General
12 100 N. Carson St.
13 Carson City, NV 89701
14 lstjules@ag.nv.gov
15 *Attorneys for Defendant Francisco V Aguilar*

David R. Fox, Esq.
ELIAS LAW GROUP LLP
250 Massachusetts Ave. NW, Ste. 400
Washington, D.C. 20001
dfox@elias.law
*Attorneys for Defendants Democratic
National Committee and Nevada State
Democratic Party*

16 DATED this 7th day of February, 2025.

17 

18 Mele D. Puletau
19 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

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

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 Hostetter

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
Standard Processing \$550 (7 - 14 days)	1	\$550.00	\$550.00
Sub Total			\$550.00
Total			\$550.00



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

Petitioner/Out-of-State Counsel Name

Courtney Hostetler

Petitioner/Out-of-State Counsel Email

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
4 IN AND FOR THE COUNTY OF CARSON CITY

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

7 Zenaide Dagusen, Republic
8 National Committee

9 vs.

10 Francisco Aguilar, Democratic
11 National Committee

12 STATE BAR OF NEVADA STATEMENT PURSUANT TO SUPREME COURT RULE
13 42 (3) (b)

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

16 SCR42(6)**Discretion.** The granting or denial of a motion to associate
17 counsel pursuant to this rule by the court is discretionary. The
18 court, arbitrator, mediator, or administrative or governmental
19 hearing officer may revoke the authority of the person permitted to
appear under this rule. Absent special circumstances, repeated
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
22 more than 5 appearances by any attorney granted under
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
25 for an appearance in excess of the limitation set forth
26 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.

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

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

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

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

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

7 DATED this January 21, 2025

8
9
10 Suzy Moore
11 Suzy Moore
12 Member Services Admin.
13 Pro Hac Vice Processor
14 STATE BAR OF NEVADA
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT “D”

EXHIBIT “D”

1
2
3
4
5
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
2024, INC.

Case No.: 24-OC-001531B

Dept. No.: 1

12 Plaintiffs,

13 v.

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

17 Defendants,

18 and

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

21 Defendant-Intervenor.
22

23 **ORDER ADMITTING TO PRACTICE**

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 _____
DISTRICT COURT JUDGE

13 Submitted by:

14 WOODBURN AND WEDGE

15 
16 W. Chris Wicker [NSB No. 1037]
17 Jose A. Tafoya [NSB No. 16011]
18 6100 Neil Road, Suite 500
19 Reno, NV 89511-1149
20 Tel: (775) 688-3000 | Fax: (775) 688-3088
21 wwicker@woodburnandwedge.com
22 jtafoya@woodburnandwedge.com

23 MAYER BROWN LLP
24 Lee Rubin (*pro hac vice* pending)
25 Two Palo Alto Square, Suite 300
26 3000 El Camino Real
27 Palo Alto, CA 94306-2112
28 lrubin@mayerbrown.com
Rachel J. Lamorte (*pro hac vice* pending)
1999 K Street, NW
Washington, DC 20006-1101
(202) 263-3000
rlamorte@mayerbrown.com
Robert C. Double III (*pro hac vice* pending)
333 South Grand Avenue, 47th Floor
Los Angeles, CA 90071
(213) 229-9500
rdouble@mayerbrown.com

1 FREE SPEECH FOR PEOPLE
Amira Mattar (*pro hac vice* pending)
2 John Bonifaz (*pro hac vice* pending)
Courtney Hostetler (*pro hac vice* pending)
3 48 N. Pleasant Street, Suite 304
4 Amherst, MA 01002
(617) 244-0234
5 amira@freespeechforpeople.org
6 jbbonifaz@freespeechforpeople.org
chostetler@freespeechforpeople.org
7 Attorneys for Intervenor-Defendant NAACP Tri-State
Conference of Idaho-Nevada-Utah