

1 SADMIRA RAMIC, ESQ.
2 Nevada State Bar No. 15984
3 **AMERICAN CIVIL LIBERTIES**
4 **UNION OF NEVADA**
5 4362 W. Cheyenne Ave.
6 North Las Vegas, NV 89032
7 Telephone: (702) 366-1226
8 Facsimile: (702) 718-2313
9 Email: ramic@aclunv.org
10 *Counsel of Record for Amici Curiae*

REC'D & FILED

2025 JAN 14 PM 1:16

WILLIAM SCOTT HOEN
CLERK

BY

7 **FIRST JUDICIAL DISTRICT COURT**

8 **IN AND FOR CARSON CITY, STATE OF NEVADA**

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

Plaintiffs,

13 vs.

14 FRANCISCO AGUILAR, in his official capacity
15 as NEVADA SECRETARY OF STATE;
16 DEMOCRATIC NATIONAL COMMITTEE; and
17 NEVADA STATE DEMOCRATIC PARTY,

Defendants.

Case No.: 24-OC-001531B

Dept. No.: 1

MOTION TO ASSOCIATE COUNSEL

19 Petitioner, American Civil Liberties Union of Nevada, hereby move the Court for an order
20 permitting Kenneth Alexis Parreno to practice in Nevada pursuant to Nevada Supreme Court Rule
21 42 (SCR 42). This motion is supported by the attached "Verified Application for Association of
22 Counsel" (Exhibit 1), "Certificates of Good Standing" from Massachusetts and Texas (Exhibit 2)
23 and the State Bar of Nevada Statement (Exhibit 3).
24

1 Dated this 14th day of January 2025.

Submitted by:



Sadmira Ramic, Esq.
Nevada Bar No. 15984
ACLU of Nevada
4362 W. Cheyenne Ave.
North Las Vegas, NV 89032
Counsel of Record for Amici Curiae

1 **NOTICE OF MOTION**

2 TO: All Interested Parties; and

3 TO: All Counsel of Record

4 PLEASE TAKE NOTICE that Petitioner, American Civil Liberties Union of Nevada,
5 will bring the foregoing MOTION TO ASSOCIATE COUNSEL on for decision on the 14th
6 day of January 2025, in the above-entitled Court.

7 Dated this 14th day of January 2025.

8 

9 Sadmira Ramic, Esq.
10 Nevada Bar No. 15984
11 4362 W. Cheyenne Ave.
12 North Las Vegas, NV 89032
13 Email: ramic@aclunv.org
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INDEX OF EXHIBITS

Exhibit No.	Description	Number of Pages
1	VERIFIED APPLICATION FOR ASSOCIATION OF COUNSEL	6
2	CERTIFICATES OF GOOD STANDING FROM MASSACHUSETTS AND TEXAS	2
3	STATE BAR OF NEVADA STATEMENT	2

DATED this 14th day of January 2025.

CERTIFICATE OF SERVICE

I hereby certify that on January 14th, 2025, a true and correct copy of **MOTION TO ASSOCIATE** was served via electronic mail addressed to:

Brian R. Hardy, Esq.
Harry L. Arnold, Esq.
MARQUIS AURBACH
bhardy@maclaw.com
harnold@maclaw.com

Attorneys for Plaintiffs

Bradley S. Schrager, Esq.
Daniel Bravo, Esq.
BRACO SCHRAGER LLP
bradley@bravoschrager.com
daniel@bravoschrager.com

David R. Fox, Esq.
ELIAS LAW GROUP LLP
dfox@elias.law

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

Aaron D. Ford, Esq.
Laena St-Jules, Esq.
Devin A. Oliver, Esq.
OFFICE OF THE ATTORNEY GENERAL
lstjules@ag.nv.gov
doliver@ag.nv.gov

Attorneys for Defendant Secretary of State



An employee of the ACLU of Nevada

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EXHIBIT 1

Verified Application for Association of Counsel

Suzy Moore

From: SBN Website <noreply@nvbar.org>
Sent: Thursday, January 2, 2025 5:18 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, an individual; 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; and Nevada State Democratic Party

Petitioner Information

Name - First, Middle, Last, Suffix

Kenneth Alexis Parreno

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

Protect Democracy Project

Firm Address

15 Main Street
Suite 312
Watertown, MA 02472
United States
[Map It](#)

Telephone No. xxx-xxx-xxxx

202-579-4582

Petitioner's Email

kenneth.parreno@protectdemocracy.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:

Protect Democracy Project

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
- Texas

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.

- Certificates-and-Emails-Kenneth-Parreno.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. Court of Appeals for the Fifth Circuit - 03/14/2023
U.S. District Court for the Western District of Texas - 10/31/2022
U.S. District Court for the District of Colorado - 05/25/2023
U.S. District Court for the District of Columbia - 04/03/2023
Pro Hac Vice: Arizona - Maricopa County Superior Court - 07/29/2024

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

Sadmira Ramic

Nevada Counsel Bar No.

15984

Firm Information

American Civil Liberties Union of Nevada
4362 W. Cheyenne Ave.
North Las Vegas, NV 89032
United States
Map It

Telephone No. xxx-xxx-xxxx

702-366-1226

Nevada Counsel Email

ramic@aclunv.org

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

Kenneth Parreno

Date Submitted

01/02/2025

Payment Method

Credit Card

Credit Card

Visa
XXXXXXXXXXXX5487

Billing Address



Order

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

Suzy Moore

From: SBN Website <noreply@nvbar.org>
Sent: Friday, January 3, 2025 8:28 AM
To: Mary Jorgensen; Prohac; Suzy Moore
Subject: New Nevada Consent for Pro Hac

DESIGNATION, CERTIFICATION AND CONSENT OF NEVADA COUNSEL

Nevada Counsel Name - First, Middle, Last, Suffix

Sadmira Ramic

Nevada Counsel Bar No.

15984

Nevada Counsel Email

ramic@aclunv.org

Petitioner/Out-of-State Counsel Name

Kenneth Parreno

Petitioner/Out-of-State Counsel Email

kenneth.parreno@protecdemocracy.org

Case No.

24OC00153-1B

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.

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

Sadmira Ramic

Date Submitted

01/03/2025

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EXHIBIT 2

Certificates of Good Standing from Massachusetts and Texas

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 **November 19, 2019**, said Court being the highest Court of Record in said Commonwealth:

Kenneth Parreno

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 **sixteenth** 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.

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

December 13, 2024

Re: Kenneth Alexis Parreno, State Bar Number 24130477

To Whom It May Concern:

This is to certify that Kenneth Alexis Parreno was licensed to practice law in Texas on September 08, 2022, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

This certification expires 30 days from the date, unless sooner revoked or rendered invalid by operation of rule or law.

Sincerely,

Seana Willing
Chief Disciplinary Counsel
SW/web



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EXHIBIT 3
State Bar of Nevada
Statement

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 Zenaida 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: 1/3/2025

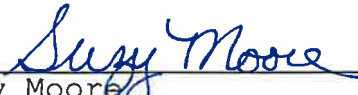
28 2. APPLYING ATTORNEY: Kenneth Alexis Parreno, Esq.

1 3. FIRM NAME AND ADDRESS: Protect Democracy Project, 15 Main
2 Street, Suite 312, Watertown, MA 2472

3 4. NEVADA COUNSEL OF RECORD: Sadmira Ramic, Esq., ACLUNV, 4362 W.
4 Cheyenne Ave., North Las Vegas, NV 89032

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

7 DATED this January 10, 2025

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