

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)

REC'D & FILED

2025 JAN -8 AM 11: 15

WILLIAM SCOTT HOEN  
CLERK

BY DEPUTY

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  
15 [lrubin@mayerbrown.com](mailto:lrubin@mayerbrown.com)  
16 Rachel J. Lamorte (*pro hac vice* pending)  
17 1999 K Street, NW  
18 Washington, DC 20006-1101  
19 (202) 263-3000  
20 [rlamorte@mayerbrown.com](mailto:rlamorte@mayerbrown.com)  
21 Robert C. Double III (*pro hac vice* pending)  
22 333 South Grand Avenue, 47th Floor  
23 Los Angeles, CA 90071  
24 (213) 229-9500  
25 [rdouble@mayerbrown.com](mailto:rdouble@mayerbrown.com)

26 FREE SPEECH FOR PEOPLE  
27 Amira Mattar (*pro hac vice* pending)  
28 John Bonifaz (*pro hac vice* pending)  
14 48 N. Pleasant Street, Suite 304  
15 Amherst, MA 01002  
16 (617) 244-0234  
17 [amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)  
18 [jbonifaz@freespeechforpeople.org](mailto:jbonifaz@freespeechforpeople.org)

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 Case No.: 24-OC-001531B

39 Dept. No.: 1

40 **MOTION TO ASSOCIATE COUNSEL**

41 Plaintiffs,

vs.

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

Defendants,

and

## NAACP Tri-State Conference of Idaho-Nevada-Utah.

**Defendant-Intervenor.**

**MOTION TO ASSOCIATE COUNSEL**

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

Affirmation Pursuant to NRS 239B.030

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

Dated this 1 day of January 2025.

## WOODBURN AND WEDGE

W. Christopher

W. Chris Wicker [NSB No. 1037]  
Jose A. Tafoya [NSB No. 16011]  
6100 Neil Road, Suite 500  
Reno, NV 89511-1149

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

Palo Alto, CA 94306-2112  
[lrubin@mayerbrown.com](mailto:lrubin@mayerbrown.com)  
Rachel J. Lamorte (*pro hac vice* pending)  
1999 K Street, NW  
Washington, DC 20006-1101  
(202) 263-3000  
[rlamorte@mayerbrown.com](mailto: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](mailto:rdouble@mayerbrown.com)

## FREE SPEECH FOR PEOPLE

Amira Mattar (*pro hac vice* pending)  
John Bonifaz (*pro hac vice* pending)  
48 N. Pleasant Street, Suite 304  
Amherst, MA 01002  
(617) 244-0234  
[amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)  
[ibonifaz@freespeechforpeople.org](mailto:ibonifaz@freespeechforpeople.org)

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

1

**INDEX OF EXHIBITS**

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

<b><u>Exhibit</u></b>	<b><u>Description</u></b>	<b><u>Pages</u></b>
A	Verified Application for Association of Counsel	6
B	Certificates of Good Standing from Massachusetts, New York, and Washington D.C.	4
C	State Bar of Nevada Statement Pursuant to Supreme Court Rule 42(3)(b)	2
D	Proposed Order Admitting to Practice	3

## **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

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)

*Attorneys for Defendant Francisco V Aguilar*

Julie Harkleroad  
Judicial Assistant to Hon. James Russell  
First Judicial District Court, Dept. I  
[JHarkleroad@carson.org](mailto:JHarkleroad@carson.org)

DATED this 8<sup>th</sup> day of January, 2025.

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)

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 Defendants Democratic National Committee and Nevada State Democratic Party*

Mark R. Wedge  
An employee of Woodburn and Wedge

**EXHIBIT “A”**

**EXHIBIT “A”**

## Suzy Moore

---

**From:** SBN Website <noreply@nvbar.org>  
**Sent:** Friday, December 20, 2024 2:50 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

Rachel J. Lamorte

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

Mayer Brown LLP

#### Firm Address

1999 K Street, N.W.  
Washington, District of Columbia 20006-1101  
United States  
[Map It](#)

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

202-263-3262

#### Petitioner's Email

[rlamorte@mayerbrown.com](mailto:rlamorte@mayerbrown.com)

#### 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:

Intervenor-Defendant, 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.

- District of Columbia
- Massachusetts
- New York

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.

- Lamorte-COGS.pdf

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

Bar of the District of Columbia, 12/17/2021  
Massachusetts State Bar, 3/27/2015  
New York State Bar, 10/5/2015  
U.S. Court of Appeals, 9th Circuit, 11/1/2023  
U.S. District Court, Southern District of New York, 1/19/2016

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 89511-1149  
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**

Rachel J. Lamorte

**Date Submitted**

12/20/2024

**Payment Method**

Credit Card

**Credit Card**

Visa  
XXXXXXXXXXXX7992

**Billing Address**

1221 Avenue of the Americas  
New York, NY 10020  
[Map It](#)

**Order**

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

## Suzy Moore

---

**From:** SBN Website <noreply@nvbar.org>  
**Sent:** Tuesday, December 24, 2024 11:13 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**

W. Chris Wicker

**Nevada Counsel Bar No.**

1037

**Nevada Counsel Email**

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

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

Rachel J. Lamorte

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

[RLamorte@mayerbrown.com](mailto:RLamorte@mayerbrown.com)

**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.**

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

12/24/2024

**EXHIBIT “B”**

**EXHIBIT “B”**



The Commonwealth of Massachusetts

SUPREME JUDICIAL COURT

FOR SUFFOLK COUNTY

JOHN ADAMS COURTHOUSE

ONE PEMBERTON SQUARE, SUITE 1300

BOSTON, MASSACHUSETTS 02108-1707

WWW.SJCCOUNTYCLERK.COM

MAURA S. DOYLE

CLERK

CASE INFORMATION (617) 557-1100

FACSIMILE (617) 557-1117

ATTORNEY SERVICES (617) 557-1050

FACSIMILE (617) 557-1055

December 5, 2024

Attorney Rachel J. Lamorte  
Abayomi Talbot  
1221 Ave of the Americas  
New York, NY 10020  
atalbot@mayerbrown.com

IN RE: CERTIFICATE OF ADMISSION AND GOOD STANDING

Enclosed please find the Certificate of Admission and Good Standing for Commonwealth of Massachusetts Attorney **Rachel J. Lamorte**. The certificate provides certification of the attorney's date of admission and current good standing at the Bar of the Commonwealth of Massachusetts.

If you have any questions or should need further assistance, please do not hesitate to contact the Attorney Services Department at either [sjccertsgs@sjc.state.ma.us](mailto:sjccertsgs@sjc.state.ma.us) or 617-557-1050.

Very truly yours,

MAURA S. DOYLE  
Clerk  
Supreme Judicial Court

MSD/ jr

Clearance: 12/05/2024 12.04.2024

Enclosures

# 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 **March 27, 2015**,  
said Court being the highest Court of Record in said Commonwealth:

**Rachel J. Lamorte**

---

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 **fifth** 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.



*Appellate Division of the Supreme Court  
of the State of New York  
First Judicial Department*

---

*I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that*

*Rachel Jennifer Lamorte*

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on **October 5, 2015**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Office of Court Administration, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*

*In Witness Whereof, I have hereunto set my hand in the City of New York on December 4, 2024.*



*Susanna M. Rojas*

*Clerk of the Court*



*On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,  
the District of Columbia Bar does hereby certify that*

## ***Rachel Jennifer Lamorte***

*was duly qualified and admitted on December 17, 2021 as an attorney and counselor entitled to  
practice before this Court; and is, on the date indicated below, an Active member in good  
standing of this Bar.*

*In Testimony Whereof,  
I have hereunto subscribed my  
name and affixed the seal of this  
Court at the City of  
Washington, D.C., on December 04, 2024.*

A handwritten signature in black ink, appearing to read "Julio A. Castillo".  
JULIO A. CASTILLO  
Clerk of the Court

*Issued By:*

A handwritten signature in black ink, appearing to read "David Chu".  
David Chu - Director, Membership  
District of Columbia Bar Membership

**For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email [memberservices@dcbar.org](mailto:memberservices@dcbar.org).**

**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      /

13  
14      **STATE BAR OF NEVADA STATEMENT PURSUANT TO SUPREME COURT RULE**  
15      **42 (3) (b)**

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

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

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

1. DATE OF APPLICATION: 12/20/2024  
2. APPLYING ATTORNEY: Rachel Jennifer Lamorte, Esq.

3. FIRM NAME AND ADDRESS: Mayer Brown, LLP, 1999 K. Street, N.W.,  
Washington, DC 20006

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

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

DATED this December 26, 2024

Suzy Moore  
Suzy Moore  
Member Services Admin.  
Pro Hac Vice Processor  
STATE BAR OF NEVADA

**EXHIBIT “D”**

**EXHIBIT “D”**

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

## IN AND FOR CARSON CITY

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

Case No.: 24-OC-001531B

Dept. No.: 1

## Plaintiffs.

v.

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

## Defendants.

and

## NAACP Tri-State Conference of Idaho-Nevada-Utah.

### Defendant-Intervenor.

## ORDER ADMITTING TO PRACTICE

Currently before this Court is a *Motion to Associate Counsel* (“Motion”) filed by Intervenor-Defendant NAACP Tri-State Conference of Idaho-Nevada-Utah (“Intervenor-Defendant”) on January 7, 2025. Intervenor-Defendant requests an Order from this Court permitting RACHEL J. LAMORTE, ESQ. to practice in Nevada pursuant to Nevada Supreme Court Rule 42. Intervenor-Defendant’s Motion was accompanied with a Verified Application for Association of Counsel (Exhibit A), a Certificate of Good Standing for the states of Massachusetts,

1 New York, and Washington D.C. (Exhibit B) and the State Bar of Nevada Statement (Exhibit C).  
2 Having reviewed the papers and pleadings on file herein and applicable law, this Court finds good  
3 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 **RACHEL J. LAMORTE, ESQ.** is hereby  
8 admitted to practice in the above-entitled Court on behalf of Intervenor-Defendant for the purposes  
9 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  
Tel: (775) 688-3000 | Fax: (775) 688-3088  
[wwicker@woodburnandwedge.com](mailto:wwicker@woodburnandwedge.com)  
[jtafoya@woodburnandwedge.com](mailto:jtafoya@woodburnandwedge.com)

20 **MAYER BROWN LLP**

21 Lee Rubin (*pro hac vice* pending)  
22 Two Palo Alto Square, Suite 300  
3000 El Camino Real  
23 Palo Alto, CA 94306-2112  
[lrubin@mayerbrown.com](mailto:lrubin@mayerbrown.com)  
24 Rachel J. Lamorte (*pro hac vice* pending)  
1999 K Street, NW  
25 Washington, DC 20006-1101  
(202) 263-3000  
[rlamorte@mayerbrown.com](mailto:rlamorte@mayerbrown.com)

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

1      **FREE SPEECH FOR PEOPLE**

2      Amira Mattar (*pro hac vice* pending)  
3      John Bonifaz (*pro hac vice* pending)  
4      48 N. Pleasant Street, Suite 304  
5      Amherst, MA 01002  
6      (617) 244-0234  
7      amira@freespeechforpeople.org  
8      jbonifaz@freespeechforpeople.org

9  
10     *Attorneys for Intervenor-Defendant NAACP Tri-State*  
11     *Conference of Idaho-Nevada-Utah*

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

REC'D & FILED

2025 JAN -8 AM 11: 15

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 [itafoya@woodburnandwedge.com](mailto:itafoya@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  
15 [lrubin@mayerbrown.com](mailto:lrubin@mayerbrown.com)  
16 Rachel J. Lamorte (*pro hac vice* pending)  
17 1999 K Street, NW  
18 Washington, DC 20006-1101  
19 (202) 263-3000  
20 [rlamorte@mayerbrown.com](mailto:rlamorte@mayerbrown.com)

21 Robert C. Double III (*pro hac vice* pending)  
22 333 South Grand Avenue, 47th Floor  
23 Los Angeles, CA 90071  
24 (213) 229-9500  
25 [rdouble@mayerbrown.com](mailto:rdouble@mayerbrown.com)

26 FREE SPEECH FOR PEOPLE  
27 Amira Mattar (*pro hac vice* pending)  
28 John Bonifaz (*pro hac vice* pending)  
14 48 N. Pleasant Street, Suite 304  
15 Amherst, MA 01002  
16 (617) 244-0234  
17 [amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)  
18 [jbonifaz@freespeechforpeople.org](mailto:jbonifaz@freespeechforpeople.org)

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  
37 2024, INC.

38 Case No.: 24-OC-001531B

39 Dept. No.: 1

40 **MOTION TO ASSOCIATE COUNSEL**

41 Plaintiffs,  
42

1  
2  
3  
4  
5  
vs.

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

6  
7  
Defendants,  
and

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

10  
11  
Defendant-Intervenor.

#### MOTION TO ASSOCIATE COUNSEL

12  
13  
14  
15  
16  
17  
18  
19  
Intervenor-Defendant NAACP Tri-State Conference of Idaho-Nevada-Utah hereby moves  
the Court for an order permitting **Robert C. Double III, Esq.** to practice in Nevada pursuant to  
Nevada Supreme Court Rule 42 (SCR 42). This motion is supported by the attached “Verified  
Application for Association of Counsel” (**Exhibit A**), “Certificates of Good Standing” from  
California, New York, Oregon, and Washington (**Exhibit B**), and the State Bar of Nevada  
Statement (**Exhibit C**). A proposed Order Admitting to Practice is attached hereto as **Exhibit D**.

20  
21  
22  
23  
24  
Affirmation Pursuant to NRS 239B.030

25  
26  
27  
28  
The undersigned does hereby affirm that the *Motion to Associate Counsel* does not contain  
the social security number of any person.

Dated this 7 day of January 2025.

WOODBURN AND WEDGE



W. Chris Wicker [NSB No. 1037]  
Jose A. Tafoya [NSB No. 16011]  
6100 Neil Road, Suite 500  
Reno, NV 89511-1149

MAYER BROWN LLP  
Lee Rubin (*pro hac vice* pending)  
Two Palo Alto Square, Suite 300

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

## FREE SPEECH FOR PEOPLE

Amira Mattar (*pro hac vice* pending)  
John Bonifaz (*pro hac vice* pending)  
48 N. Pleasant Street, Suite 304  
Amherst, MA 01002  
(617) 244-0234  
[amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)  
[jbonifaz@freespeechforpeople.org](mailto:jbonifaz@freespeechforpeople.org)

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

## **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 from California, New York, Oregon, and Washington	4
C	State Bar of Nevada Statement	2
D	Proposed Order Admitting to Practice	3

**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*

*Attorneys for Plaintiffs*

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)

*Attorneys for Defendant Francisco V Aguilar*

Julie Harkleroad  
Judicial Assistant to Hon. James Russell  
First Judicial District Court, Dept. I  
[JHarkleroad@carson.org](mailto:JHarkleroad@carson.org)

DATED this 8th day of January, 2025.

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)

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 Defendants Democratic National Committee and Nevada State Democratic Party*

John P. Parker

An employee of Woodburn and Wedge

**EXHIBIT “A”**

**EXHIBIT “A”**

## Suzy Moore

---

**From:** SBN Website <noreply@nvbar.org>  
**Sent:** Friday, December 20, 2024 2:16 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

Robert C. Double III

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

Mayer Brown LLP

#### Firm Address

333 S. Grand Ave., 47th Floor  
Los Angeles, California 90071-1503  
United States  
[Map It](#)

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

213-229-5121

#### Petitioner's Email

[rdouble@mayerbrown.com](mailto:rdouble@mayerbrown.com)

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:

Intervenor-Defendant, 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.

- California
- New York
- Oregon
- Washington

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.

- Double-COGS.pdf

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

California State Bar, 12/6/2014  
New York State Bar, 9/19/2024  
Oregon State Bar, 4/13/2020  
Washington State Bar, 12/4/2019  
U.S. District Court, Central District of California, 4/6/2016  
U.S. District Court, Northern District of California, 9/8/2021  
U.S. District Court, Eastern District of California, 4/8/2016  
U.S. District Court, Southern District of California, 12/3/2021  
U.S. District Court, Oregon District Court, 5/27/2020  
U.S. District Court, Washington Western District Court, 5/28/2020

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 89511-1149  
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**

Robert C. Double III

**Date Submitted**

12/20/2024

**Payment Method**

Credit Card

**Credit Card**

Visa

XXXXXXXXXXXX7992

**Billing Address**

1221 Avenue of the Americas  
New York, NY 10020

[Map It](#)

**Order**

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

## Suzy Moore

---

**From:** SBN Website <noreply@nvbar.org>  
**Sent:** Tuesday, December 24, 2024 11:15 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**

W. Chris Wicker

**Nevada Counsel Bar No.**

1037

**Nevada Counsel Email**

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

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

Robert C. Double

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

[RDouble@mayerbrown.com](mailto:RDouble@mayerbrown.com)

**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.**

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**

12/24/2024

**EXHIBIT “B”**

**EXHIBIT “B”**



## Supreme Court of California

JORGE E. NAVARRETE

*Clerk and Executive Officer of the Supreme Court*

### **CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA**

#### **ROBERT CHESTER DOUBLE**

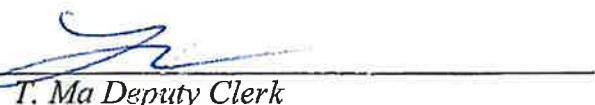
*I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that ROBERT CHESTER DOUBLE, #301637, was on the 6<sup>th</sup> day of December 214 duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court  
on the 4th day of December 2024.*

JORGE E. NAVARRETE

*Clerk/Executive Officer of the Supreme Court*

By:



*T. Ma* Deputy Clerk



*Appellate Division of the Supreme Court  
of the State of New York  
Third Judicial Department*

---

*I, Robert D. Mayberger, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that*

*Robert Chester Double, III*

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on September 16, 2024, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Office of Court Administration, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*

*In Witness Whereof, I have hereunto set  
my hand in the City of Albany on  
December 4, 2024.*



*Robert D Mayberger*

*Clerk of the Court*



STATE OF OREGON  
SUPREME COURT  
SALEM

In the Matter of the Admission of

ROBERT C. DOUBLE, III

as an Attorney of this Court.

I, as State Court Administrator of the State of Oregon, certify that on the  
13th day of April, 2020

ROBERT C. DOUBLE, III

was admitted to the practice of law in the Supreme Court and all other courts in the State of  
Oregon, and is now an attorney in good standing.

December 5, 2024.

NANCY COZINE  
State Court Administrator



*Andrea Kinney*  
Authorized Representative

# IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION )  
OF ) BAR NO. 55833  
ROBERT CHESTER DOUBLE III ) CERTIFICATE  
TO PRACTICE IN THE COURTS OF THIS STATE ) OF  
 ) GOOD STANDING  
 )

---

I, Sarah R. Pendleton, Acting Clerk of the Supreme Court of the State of Washington, hereby certify

## ROBERT CHESTER DOUBLE III

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on December 4, 2019, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of this Court on the 4<sup>th</sup> day of December, 2024.

A handwritten signature in black ink, appearing to read "Sarah R. Pendleton".

Sarah R. Pendleton  
Acting Supreme Court Clerk  
Washington State Supreme Court

**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  
20      appear under this rule. Absent special circumstances, repeated  
21      appearances by any person or firm of attorneys pursuant to this rule  
22      shall be cause for denial of the motion to associate such person.

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

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

34      1. DATE OF APPLICATION: 12/20/2024

35      2. APPLYING ATTORNEY: Robert Chester Double, III Esq.

1       3. FIRM NAME AND ADDRESS: Mayer Brown, LLP, 333 South Grand  
2       Avenue, 47th Floor, Los Angeles, CA 90071

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 December 26, 2024

8  
9         
10      Suzy Moore  
11      Member Services Admin.  
12      Pro Hac Vice Processor  
13      STATE BAR OF NEVADA

**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  
12 2024, INC.

Case No.: 24-OC-001531B

Dept. No.: 1

13 Plaintiffs,  
14 *vs.*

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

20 Defendants,  
21 and

22 NAACP Tri-State Conference of Idaho-  
23 Nevada-Utah,

24 Defendant-Intervenor.

25 **ORDER ADMITTING TO PRACTICE**

26 Currently before this Court is a *Motion to Associate Counsel* ("Motion") filed by  
27 Intervenor-Defendant NAACP Tri-State Conference of Idaho-Nevada-Utah ("Intervenor-  
28 Defendant") on January 7, 2025. Intervenor-Defendant requests an Order from this Court  
permitting ROBERT C. DOUBLE, III, ESQ. to practice in Nevada pursuant to Nevada Supreme  
Court Rule 42. Intervenor-Defendant's Motion was accompanied with a Verified Application for  
Association of Counsel (Exhibit A), a Certificate of Good Standing for the states of California,

1 New York, Oregon, and Washington (Exhibit B) and the State Bar of Nevada Statement (Exhibit  
2 C). Having reviewed the papers and pleadings on file herein and applicable law, this Court finds  
3 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 **ROBERT C. DOUBLE, III, 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 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](mailto:wwicker@woodburnandwedge.com)  
22 [jtafoya@woodburnandwedge.com](mailto: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](mailto:lrubin@mayerbrown.com)

29 Rachel J. Lamorte (*pro hac vice* pending)  
30 1999 K Street, NW  
31 Washington, DC 20006-1101  
32 (202) 263-3000  
33 [rlamorte@mayerbrown.com](mailto:rlamorte@mayerbrown.com)

34 Robert C. Double III (*pro hac vice* pending)  
35 333 South Grand Avenue, 47th Floor  
36 Los Angeles, CA 90071  
37 (213) 229-9500  
38 [rdouble@mayerbrown.com](mailto:rdouble@mayerbrown.com)

1 **FREE SPEECH FOR PEOPLE**

2 Amira Mattar (*pro hac vice* pending)

3 John Bonifaz (*pro hac vice* pending)

4 48 N. Pleasant Street, Suite 304

5 Amherst, MA 01002

6 (617) 244-0234

7 [amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)

8 [ibonifaz@freespeechforpeople.org](mailto:ibonifaz@freespeechforpeople.org)

9

10 *Attorneys for Intervenor-Defendant NAACP Tri-State*

11 *Conference of Idaho-Nevada-Utah*

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

REC'D & FILED

2025 JAN -8 AM 11:15

WILLIAM SCOTT KOEN  
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 [itafoya@woodburnandwedge.com](mailto:itafoya@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  
15 [lrubin@mayerbrown.com](mailto:lrubin@mayerbrown.com)

16 Rachel J. Lamorte (*pro hac vice* pending)  
17 1999 K Street, NW  
18 Washington, DC 20006-1101  
19 (202) 263-3000  
20 [rlamorte@mayerbrown.com](mailto:rlamorte@mayerbrown.com)

21 Robert C. Double III (*pro hac vice* pending)  
22 333 South Grand Avenue, 47th Floor  
23 Los Angeles, CA 90071  
24 (213) 229-9500  
25 [rdouble@mayerbrown.com](mailto:rdouble@mayerbrown.com)

26 FREE SPEECH FOR PEOPLE  
27 Amira Mattar (*pro hac vice* pending)  
28 John Bonifaz (*pro hac vice* pending)  
29 48 N. Pleasant Street, Suite 304  
30 Amherst, MA 01002  
31 (617) 244-0234  
32 [amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)  
33 [jbonifaz@freespeechforpeople.org](mailto:jbonifaz@freespeechforpeople.org)

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

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

37 **IN AND FOR CARSON CITY**

38 ZENAIDA DAGUSEN, an individual;  
39 REPUBLICAN NATIONAL COMMITTEE;  
40 NEVADA REPUBLICAN PARTY; and  
41 DONALD J. TRUMP FOR PRESIDENT 2024,  
42 INC.

43 Case No.: 24-OC-001531B

44 Dept. No.: 1

45 **MOTION TO ASSOCIATE COUNSEL**

46 Plaintiffs,  
47  
48

VS.

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

## Defendants,

and

NAACP Tri-State Conference of Idaho-Nevada-Utah.

**Defendant-Intervenor.**

## MOTION TO ASSOCIATE COUNSEL

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

**Affirmation Pursuant to NRS 239B.030**

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

Dated this 7 day of January 2025.

WOODBURN AND WEDGE

W. Chris Wicker [NSB No. 1037]  
Jose A. Tafoya [NSB No. 16011]  
6100 Neil Road, Suite 500  
Reno, NV 89511-1149

**MAYER BROWN LLP**  
Lee Rubin (*pro hac vice* pending)

1 Two Palo Alto Square, Suite 300  
2 3000 El Camino Real  
3 Palo Alto, CA 94306-2112  
4 [lrubin@mayerbrown.com](mailto:lrubin@mayerbrown.com)  
5 Rachel J. Lamorte (*pro hac vice* pending)  
6 1999 K Street, NW  
7 Washington, DC 20006-1101  
8 (202) 263-3000  
9 [rlamorte@mayerbrown.com](mailto:rlamorte@mayerbrown.com)  
10 Robert C. Double III (*pro hac vice* pending)  
11 333 South Grand Avenue, 47th Floor  
12 Los Angeles, CA 90071  
13 (213) 229-9500  
14 [rdouble@mayerbrown.com](mailto:rdouble@mayerbrown.com)

15 **FREE SPEECH FOR PEOPLE**  
16 Amira Mattar (*pro hac vice* pending)  
17 John Bonifaz (*pro hac vice* pending)  
18 48 N. Pleasant Street, Suite 304  
19 Amherst, MA 01002  
20 (617) 244-0234  
21 [amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)  
22 [jbonifaz@freespeechforpeople.org](mailto:jbonifaz@freespeechforpeople.org)

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

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 from California and Washington D.C.	2
C	State Bar of Nevada Statement	2
D	Proposed Order Admitting to Practice	3

**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

*Attorneys for Plaintiffs*

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)

*Attorneys for Defendant Francisco V Aguilar*

Julie Harkleroad  
Judicial Assistant to Hon. James Russell  
First Judicial District Court, Dept. I  
[JHarkleroad@carson.org](mailto:JHarkleroad@carson.org)

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)

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 Defendants Democratic National Committee and Nevada State Democratic Party*

DATED this 8th day of January, 2025.

John D. Parker  
An employee of Woodburn and Wedge

**EXHIBIT “A”**

**EXHIBIT “A”**

## **Suzy Moore**

---

**From:** SBN Website <noreply@nvbar.org>  
**Sent:** Friday, December 20, 2024 1:37 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**

Lee H. Rubin

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

Mayer Brown LLP

#### **Firm Address**

Two Palo Alto Square, Suite 300  
Palo Alto, California 94306-2112  
United States  
[Map It](#)

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

650-331-2037

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

[lrubin@mayerbrown.com](mailto:lrubin@mayerbrown.com)

**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:**

Intervenor-Defendant, 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.

- California
- District of Columbia

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.

- Rubin-COGS.pdf

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

California State Bar, 7/3/1989  
Bar of the District of Columbia, 2/6/1991</p><p>U.S. Court of Appeals, 11th Circuit, 10/1/2004  
U.S. District Court, Central District of California, 10/17/2005  
U.S. District Court, Northern District of California, 12/20/2004  
U.S. District Court, Northern District of Illinois, 6/12/2020

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 89511-1149  
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

Lee H. Rubin

#### Date Submitted

12/20/2024

#### Payment Method

Credit Card

**Credit Card**

Visa  
XXXXXXXXXXXX7992

**Billing Address**

1221 Avenue of the Americas  
New York, NY 10020

Map It

**Order**

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

**Suzy Moore**

---

**From:** SBN Website <noreply@nvbar.org>  
**Sent:** Tuesday, December 24, 2024 11:17 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**

W. Chris Wicker

**Nevada Counsel Bar No.**

1037

**Nevada Counsel Email**

wwicker@woodburnandwedge.com

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

Lee H. Rubin

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

lrubin@mayerbrown.com

**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.**

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

12/24/2024

**EXHIBIT “B”**

**EXHIBIT “B”**



## Supreme Court of California

JORGE E. NAVARRETE

*Clerk and Executive Officer of the Supreme Court*

### CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

#### LEE HOWARD RUBIN

*I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that LEE HOWARD RUBIN, #141331, was on the 3rd day of July 1989 duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court  
on the 4th day of December 2024.*

JORGE E. NAVARRETE  
*Clerk/Executive Officer of the Supreme Court*

By:

  
T. Ma Deputy Clerk



*On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,  
the District of Columbia Bar does hereby certify that*

***Lee H Rubin***

*was duly qualified and admitted on February 6, 1991 as an attorney and counselor entitled to  
practice before this Court; and is, on the date indicated below, an Active member in good  
standing of this Bar.*

*In Testimony Whereof,  
I have hereunto subscribed my  
name and affixed the seal of this  
Court at the City of  
Washington, D.C., on December 04, 2024.*

A handwritten signature in black ink that appears to read "Julio A. Castillo".  
JULIO A. CASTILLO  
Clerk of the Court

*Issued By:*

A handwritten signature in black ink that appears to read "David Chu".

David Chu - Director, Membership  
District of Columbia Bar Membership

***For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email  
memberservices@dcbar.org.***

**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  
6                   Case No. 24-OC-001531B  
7                   Dept. No. 1

8  
9       Zenaide Dagusen, Republic  
10      National Committee

11      vs.

12      Francisco Aguilar, Democratic  
13      National Committee

14                   

---

**STATE BAR OF NEVADA STATEMENT PURSUANT TO SUPREME COURT RULE**  
15                   **42 (3) (b)**

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

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

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

      (b)    **Burden on applicant.** The applicant shall have the  
      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.

1. DATE OF APPLICATION: 12/20/2024

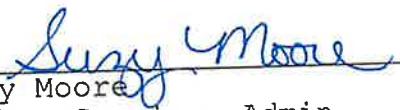
2. APPLYING ATTORNEY: Lee Howard Rubin, Esq.

1           3. FIRM NAME AND ADDRESS: Mayer Brown, LLP, Two Palo Alto Square,  
2           Suite 300, Palo Alto, CA 94306

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

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

6           7 DATED this December 26, 2024

8           9             
9           Suzy Moore  
10           Member Services Admin.  
11           Pro Hac Vice Processor  
12           STATE BAR OF NEVADA

**EXHIBIT “D”**

**EXHIBIT “D”**

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

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

Case No.: 24-OC-001531B

Dept. No.: 1

Plaintiffs,

19

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

## Defendants.

and

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

**Defendant-Intervenor.**

**ORDER ADMITTING TO PRACTICE**

Currently before this Court is a *Motion to Associate Counsel* (“Motion”) filed by Intervenor-Defendant NAACP Tri-State Conference of Idaho-Nevada-Utah (“Intervenor-Defendant”) on January 7, 2025. Intervenor-Defendant requests an Order from this Court permitting LEE H. RUBIN, ESQ. to practice in Nevada pursuant to Nevada Supreme Court Rule 42. Intervenor-Defendant’s Motion was accompanied with a Verified Application for Association

1 of Counsel (Exhibit A), a Certificate of Good Standing for the states of California and Washington  
2 D.C. (Exhibit B) and the State Bar of Nevada Statement (Exhibit C). Having reviewed the papers  
3 and 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 **LEE H. RUBIN, ESQ.** is hereby admitted  
8 to practice in the above-entitled Court on behalf of Intervenor-Defendant for the purposes of the  
9 above-entitled matter only.

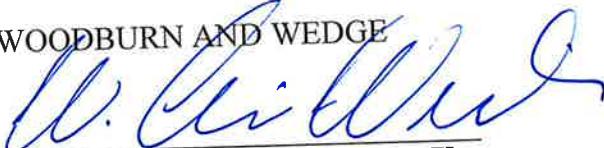
10 Dated this \_\_\_\_ day of \_\_\_\_\_ 2025.

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  
Tel: (775) 688-3000 | Fax: (775) 688-3088  
[wwicker@woodburnandwedge.com](mailto:wwicker@woodburnandwedge.com)  
[jtafoya@woodburnandwedge.com](mailto:jtafoya@woodburnandwedge.com)

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

1           **FREE SPEECH FOR PEOPLE**  
2           Amira Mattar (*pro hac vice* pending)  
3           John Bonifaz (*pro hac vice* pending)  
4           48 N. Pleasant Street, Suite 304  
5           Amherst, MA 01002  
6           (617) 244-0234  
7           [amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)  
8           [jbonifaz@freespeechforpeople.org](mailto:jbonifaz@freespeechforpeople.org)

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

REC'D & FILED

2025 JAN -8 AM 11:15

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  
15 [lrubin@mayerbrown.com](mailto:lrubin@mayerbrown.com)  
16 Rachel J. Lamorte (*pro hac vice* pending)  
17 1999 K Street, NW  
18 Washington, DC 20006-1101  
19 (202) 263-3000  
20 [rlamorte@mayerbrown.com](mailto:rlamorte@mayerbrown.com)

21 Robert C. Double III (*pro hac vice* pending)  
22 333 South Grand Avenue, 47th Floor  
23 Los Angeles, CA 90071  
24 (213) 229-9500  
25 [rdouble@mayerbrown.com](mailto:rdouble@mayerbrown.com)

26 FREE SPEECH FOR PEOPLE  
27 Amira Mattar (*pro hac vice* pending)  
28 John Bonifaz (*pro hac vice* pending)  
14 48 N. Pleasant Street, Suite 304  
15 Amherst, MA 01002  
16 (617) 244-0234  
17 [amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)  
18 [jbonifaz@freespeechforpeople.org](mailto:jbonifaz@freespeechforpeople.org)

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 Case No.: 24-OC-001531B

39 Dept. No.: 1

40 **MOTION TO ASSOCIATE COUNSEL**

41 Plaintiffs,  
42

1 vs.

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

7 Defendants,

8 and

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

11 Defendant-Intervenor.

---

12 **MOTION TO ASSOCIATE COUNSEL**

13 Intervenor-Defendant NAACP Tri-State Conference of Idaho-Nevada-Utah hereby moves  
14 the Court for an order permitting **Amira Marcella Mattar, Esq.** to practice in Nevada pursuant  
15 to Nevada Supreme Court Rule 42 (SCR 42). This motion is supported by the attached “Verified  
16 Application for Association of Counsel” (**Exhibit A**), “Certificates of Good Standing” from New  
17 York and Washington (**Exhibit B**), and the State Bar of Nevada Statement (**Exhibit C**). A  
proposed Order 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 January 2025.

22 WOODBURN AND WEDGE

23   
24 W. Chris Wicker [NSB No. 1037]  
25 Jose A. Tafoya [NSB No. 16011]  
26 6100 Neil Road, Suite 500  
27 Reno, NV 89511-1149

28  
29 **MAYER BROWN LLP**  
30 Lee Rubin (*pro hac vice* pending)

1 Two Palo Alto Square, Suite 300  
2 3000 El Camino Real  
3 Palo Alto, CA 94306-2112  
4 [lrubin@mayerbrown.com](mailto:lrubin@mayerbrown.com)  
5 Rachel J. Lamorte (*pro hac vice* pending)  
6 1999 K Street, NW  
7 Washington, DC 20006-1101  
8 (202) 263-3000  
9 [rlamorte@mayerbrown.com](mailto:rlamorte@mayerbrown.com)  
10 Robert C. Double III (*pro hac vice* pending)  
11 333 South Grand Avenue, 47th Floor  
12 Los Angeles, CA 90071  
13 (213) 229-9500  
14 [rdouble@mayerbrown.com](mailto:rdouble@mayerbrown.com)

15 **FREE SPEECH FOR PEOPLE**  
16 Amira Mattar (*pro hac vice* pending)  
17 John Bonifaz (*pro hac vice* pending)  
18 48 N. Pleasant Street, Suite 304  
19 Amherst, MA 01002  
20 (617) 244-0234  
21 [amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)  
22 [ibonifaz@freespeechforpeople.org](mailto:ibonifaz@freespeechforpeople.org)  
23  
24 *Attorneys for Intervenor-Defendant*  
25 *NAACP Tri-State Conference of Idaho-Nevada-*  
26 *Utah*

## **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 from New York and Washington	2
C	State Bar of Nevada Statement	2
D	Proposed Order Admitting to Practice	3

## 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*

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)

*Attorneys for Defendant Francisco V Aguilar*

Julie Harkleroad  
Judicial Assistant to Hon. James Russell  
First Judicial District Court, Dept. I  
[JHarkleroad@carson.org](mailto:JHarkleroad@carson.org)

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)

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 Defendants Democratic National Committee and Nevada State Democratic Party*

DATED this 8th day of January, 2025.

  
An employee of Woodburn and Wedge

**EXHIBIT “A”**

**EXHIBIT “A”**

## Suzy Moore

---

**From:** SBN Website <noreply@nvbar.org>  
**Sent:** Tuesday, December 10, 2024 11:11 AM  
**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, Democratic National Committee, and Nevada State Democratic Party

### Petitioner Information

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

Amira Marcella Mattar

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

Free Speech For People

#### Firm Address

48 N. Pleasant Street  
Suite 304  
Amherst, MA 01002  
United States  
[Map It](#)

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

617-564-0464

#### Petitioner's Email

[amira@freespeechforpeople.org](mailto:amira@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.

- New York
- Washington

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.

- Merged-CGS-NY-and-WA.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. District Court of Colorado (8/27/23); U.S. District Court of District of Columbia (MA0054; 3/25/24); First Circuit Court of Appeals (1211903; 4/10/24); Tenth Circuit Court of Appeals (10/1/24)

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, NV 89511  
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**

Amira Mattar

**Date Submitted**

12/10/2024

**Payment Method**

Credit Card

**Credit Card**

American Express  
XXXXXXXXXX2218

**Billing Address**

48 N. Pleasant Street, Suite 304  
Amherst, MA 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>

**Suzy Moore**

---

**From:** SBN Website <noreply@nvbar.org>  
**Sent:** Tuesday, December 24, 2024 11:03 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**

W. Chris Wicker

**Nevada Counsel Bar No.**

1037

**Nevada Counsel Email**

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

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

Amira Mattar

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

[amira@freespeechforpeople.org](mailto:amira@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.**

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**

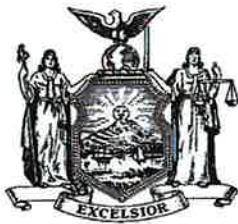
W. Chris Wicker

**Date Submitted**

12/24/2024

**EXHIBIT “B”**

**EXHIBIT “B”**



*Appellate Division of the Supreme Court  
of the State of New York  
Second Judicial Department*

---

*I, Darrell M. Joseph, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that*

*Amira Marcella Mattar*

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on June 1, 2020, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Office of Court Administration, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*



*In Witness Whereof, I have hereunto set  
my hand in the City of Brooklyn on  
December 4, 2024.*

*Clerk of the Court*



Appellate Division  
Supreme Court of the State of New York  
Second Judicial Department  
45 Monroe Place  
Brooklyn, N.Y. 11201  
(718) 875-1300

HECTOR D. LASALLE  
PRESIDING JUSTICE

DARRELL M. JOSEPH  
CLERK OF THE COURT

KENNETH BAND  
MELISSA KRAKOWSKI  
DEPUTY CLERKS

WENDY STYNES  
LAUREN G. DOME  
BRIAN E. KENNEDY  
ASSOCIATE DEPUTY CLERKS

To Whom It May Concern

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on [the website of the Unified Court System](#).

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the [Attorney Grievance Committee of the Second Judicial Department](#).

Bar examination history is available from the [New York State Board of Law Examiners](#).

Instructions, forms and links are available on [this Court's website](#).

Darrell M. Joseph  
Clerk of the Court

# CERTIFICATION OF CURRENT STATUS

December 5, 2024

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the Washington State Bar Association, **Amira Marcella Mattar**, license no. **57669** was licensed or admitted to the practice of law as a lawyer in this state by the Washington Supreme Court on **March 2, 2021**.

As of the date of this certificate, Amira Marcella Mattar is and has been in good standing as a(n) **Inactive lawyer** of the Washington State Bar Association, who is **Ineligible** to practice law in this state as a lawyer.

This certificate reflects the date of admission or licensure and the license status as of the date stated. Historical information about status, including periods on inactive status, administrative and disciplinary suspensions, disbarments, resignations, etc., are not reflected in this information, but are available through a Status History Certificate. A summary of confidential grievances and public discipline imposed is available, if authorized by the member, through a Discipline History Certificate.



---

Terra Nevitt  
Executive Director

Washington State Bar Association  
1325 Fourth Ave, Suite 600  
Seattle, WA 98101-2539  
206-443-WSBA

**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, Republican  
8       National Committee

9       vs.

10      Francisco Aguilar, Democratic  
11      National Committee

12      /

13                   **STATE BAR OF NEVADA STATEMENT PURSUANT TO SUPREME COURT RULE**  
14                   **42 (3) (b)**

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

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

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

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

35       1. DATE OF APPLICATION: 12/10/2024

36       2. APPLYING ATTORNEY: Amira Marcella Mattar, Esq.

3. FIRM NAME AND ADDRESS: Free Speech For People, 48 N. Pleasant Street, Suite 304, Amherst, MA 1002

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

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

DATED this December 26, 2024

Suzy Moore  
Suzy Moore  
Member Services Admin.  
Pro Hac Vice Processor  
STATE BAR OF NEVADA

**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  
12 2024, INC.

Case No.: 24-OC-001531B

Dept. No.: 1

13 Plaintiffs,  
14 v.  
15

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

Defendants,

and

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

Defendant-Intervenor.

21  
22 **ORDER ADMITTING TO PRACTICE**

23 Currently before this Court is a *Motion to Associate Counsel* (“Motion”) filed by  
24 Intervenor-Defendant NAACP Tri-State Conference of Idaho-Nevada-Utah (“Intervenor-  
25 Defendant”) on January 7, 2025. Intervenor-Defendant requests an Order from this Court  
26 permitting AMIRA MARCELLA MATTAR, ESQ. to practice in Nevada pursuant to Nevada  
27 Supreme Court Rule 42. Intervenor-Defendant’s Motion was accompanied with a Verified  
28 Application for Association of Counsel (Exhibit A), a Certificate of Good Standing for the states

1 of New York and Washington (Exhibit B) and the State Bar of Nevada Statement (Exhibit C).  
2 Having reviewed the papers and pleadings on file herein and applicable law, this Court finds good  
3 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 **AMIRA MARCELLA MATTAR, ESQ.**  
8 is hereby admitted to practice in the above-entitled Court on behalf of Intervenor-Defendant for  
9 the 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  
Tel: (775) 688-3000 | Fax: (775) 688-3088  
[wwicker@woodburnandwedge.com](mailto:wwicker@woodburnandwedge.com)  
[jtafoya@woodburnandwedge.com](mailto:jtafoya@woodburnandwedge.com)

20 **MAYER BROWN LLP**

21 Lee Rubin (*pro hac vice* pending)  
22 Two Palo Alto Square, Suite 300  
3000 El Camino Real  
Palo Alto, CA 94306-2112  
[lrubin@mayerbrown.com](mailto:lrubin@mayerbrown.com)

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

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

1      **FREE SPEECH FOR PEOPLE**

2      Amira Mattar (*pro hac vice* pending)  
3      John Bonifaz (*pro hac vice* pending)  
4      48 N. Pleasant Street, Suite 304  
5      Amherst, MA 01002  
6      (617) 244-0234  
7      [amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)  
8      [jbonifaz@freespeechforpeople.org](mailto:jbonifaz@freespeechforpeople.org)

9  
10     *Attorneys for Intervenor-Defendant NAACP Tri-State*  
11     *Conference of Idaho-Nevada-Utah*

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

REC'D & FILED

2025 JAN -8 AM 11:15

WILLIAM SCOTT HOEN  
CLERK

BY

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  
15 [lrubin@mayerbrown.com](mailto:lrubin@mayerbrown.com)

16 Rachel J. Lamorte (*pro hac vice* pending)  
17 1999 K Street, NW  
18 Washington, DC 20006-1101  
19 (202) 263-3000  
20 [rlamorte@mayerbrown.com](mailto:rlamorte@mayerbrown.com)

21 Robert C. Double III (*pro hac vice* pending)  
22 333 South Grand Avenue, 47th Floor  
23 Los Angeles, CA 90071  
24 (213) 229-9500  
25 [rdouble@mayerbrown.com](mailto:rdouble@mayerbrown.com)

26 FREE SPEECH FOR PEOPLE  
27 Amira Mattar (*pro hac vice* pending)  
28 John Bonifaz (*pro hac vice* pending)  
29 48 N. Pleasant Street, Suite 304  
30 Amherst, MA 01002  
31 (617) 244-0234  
32 [amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)  
33 [jbonifaz@freespeechforpeople.org](mailto:jbonifaz@freespeechforpeople.org)

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

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

37 **IN AND FOR CARSON CITY**

38 ZENAIDA DAGUSEN, an individual;  
39 REPUBLICAN NATIONAL COMMITTEE;  
40 NEVADA REPUBLICAN PARTY; and  
41 DONALD J. TRUMP FOR PRESIDENT 2024,  
42 INC.

43 Case No.: 24-OC-001531B

44 Dept. No.: 1

45 **MOTION TO ASSOCIATE COUNSEL**

46 Plaintiffs,

1 v.

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

7 Defendants,

8 and

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

11 Defendant-Intervenor.

---

12 **MOTION TO ASSOCIATE COUNSEL**

13 Intervenor-Defendant NAACP Tri-State Conference of Idaho-Nevada-Utah hereby moves  
14 the Court for an order permitting **John C. Bonifaz, Esq.** to practice in Nevada pursuant to Nevada  
15 Supreme Court Rule 42 (SCR 42). This motion is supported by the attached “Verified Application  
16 for Association of Counsel” (**Exhibit A**), “Certificates of Good Standing” from Massachusetts  
17 (**Exhibit B**), and the State Bar of Nevada Statement (**Exhibit C**). A proposed Order 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 January 2025.

22   
WOODBURN AND WEDGE

23  
24 W. Chris Wicker [NSB No. 1037]  
25 Jose A. Tafoya [NSB No. 16011]  
26 6100 Neil Road, Suite 500  
27 Reno, NV 89511-1149

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

3000 El Camino Real  
Palo Alto, CA 94306-2112  
[lrubin@mayerbrown.com](mailto:lrubin@mayerbrown.com)  
Rachel J. Lamorte (*pro hac vice* pending)  
1999 K Street, NW  
Washington, DC 20006-1101  
(202) 263-3000  
[rlamorte@mayerbrown.com](mailto: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](mailto:rdouble@mayerbrown.com)

## FREE SPEECH FOR PEOPLE

Amira Mattar (*pro hac vice* pending)  
John Bonifaz (*pro hac vice* pending)  
48 N. Pleasant Street, Suite 304  
Amherst, MA 01002  
(617) 244-0234  
[amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)  
[jbonifaz@freespeechforpeople.org](mailto:jbonifaz@freespeechforpeople.org)

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

**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

**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*

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)

*Attorneys for Defendant Francisco V Aguilar*

Julie Harkleroad  
Judicial Assistant to Hon. James Russell  
First Judicial District Court, Dept. I  
[JHarkleroad@carson.org](mailto:JHarkleroad@carson.org)

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)

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 Defendants Democratic National Committee and Nevada State Democratic Party*

DATED this 25 day of January, 2025.

W. D. Wedge  
An employee of Woodburn and Wedge

**EXHIBIT “A”**

**EXHIBIT “A”**

## Suzy Moore

---

**From:** SBN Website <noreply@nvbar.org>  
**Sent:** Friday, December 20, 2024 9:10 AM  
**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, Democratic National Committee, and Nevada State Democratic Party

### Petitioner Information

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

John C. Bonifaz

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

Free Speech For People

#### Firm Address

48 North Pleasant Street, Suite 304  
Amherst, Massachusetts 01002  
United States  
[Map It](#)

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

617-244-0234

#### Petitioner's Email

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

- [Bonifaz-Cert-of-Good-Standing1-120924.pdf](#)

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

Massachusetts Supreme Judicial Court, 01/19/1993  
US Supreme Court, 06/03/1996  
US Court of Appeals for the First Circuit, 01/01/2000  
US Court of Appeals for the Fifth Circuit, 10/29/2020  
US Court of Appeals for the Sixth Circuit, 03/01/1997  
US Court of Appeals for the Ninth Circuit, 02/28/1997  
US Court of Appeals for the Tenth Circuit, 11/27/2001  
US Court of Appeals for the DC Circuit, 02/01/2005  
US District Court for the District of Massachusetts, 02/24/1995  
US District Court for the District of Colorado, 03/08/2022

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.**

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

John C. Bonifaz

#### Date Submitted

12/20/2024

#### Payment Method

Credit Card

**Credit Card**

American Express  
XXXXXXXXXXXX3000

**Billing Address**

48 North Pleasant Street, Suite 304  
Amherst, Massachusetts 01002  
[Map It](#)

**Order**

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

## Suzy Moore

---

**From:** SBN Website <noreply@nvbar.org>  
**Sent:** Tuesday, December 24, 2024 11:06 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**

W Chris Wicker

**Nevada Counsel Bar No.**

1037

**Nevada Counsel Email**

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

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

John Bonifaz

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

[jbonifaz@freespeechforpeople.org](mailto:jbonifaz@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.**

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**

12/24/2024

**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 **January 19, 1993**,  
said Court being the highest Court of Record in said Commonwealth:

**John C. Bonifaz**

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 **ninth** 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”**

## STAT

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

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

Zenaida Dagusen, Republic  
National Committee

vs.

Francisco Aguilar, Democratic  
National Committee

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

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

**SCR42(6) Discretion.** The granting or denial of a motion to associate counsel pursuant to this rule by the court is discretionary. The court, arbitrator, mediator, or administrative or governmental 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.

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

(b) **Burden on applicant.** The applicant shall have the 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.

1. DATE OF APPLICATION: 12/20/2024

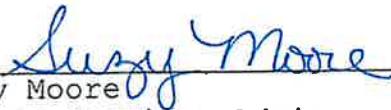
2. APPLYING ATTORNEY: John C. Bonifaz, Esq.

1           3. FIRM NAME AND ADDRESS: Free Speech For People, 48 North  
2           Pleasant Street, Suite 304, Amherst, MA 1002

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 December 26, 2024

8  
9             
10           Suzy Moore  
11           Member Services Admin.  
12           Pro Hac Vice Processor  
13           STATE BAR OF NEVADA

**EXHIBIT “D”**

**EXHIBIT “D”**

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

## IN AND FOR CARSON CITY

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

Case No.: 24-OC-001531B

Dept. No.: 1

**Plaintiffs.**

V.

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

## Defendants.

and

## NAACP Tri-State Conference of Idaho-Nevada-Utah.

### Defendant-Intervenor.

## **ORDER ADMITTING TO PRACTICE**

Currently before this Court is a *Motion to Associate Counsel* (“Motion”) filed by Intervenor-Defendant NAACP Tri-State Conference of Idaho-Nevada-Utah (“Intervenor-Defendant”) on January 7, 2025. Intervenor-Defendant requests an Order from this Court permitting JOHN C. BONIFAZ, ESQ. to practice in Nevada pursuant to Nevada Supreme 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 **JOHN C. BONIFAZ, ESQ.** is hereby  
8 admitted to practice in the above-entitled Court on behalf of Intervenor-Defendant for the purposes  
9 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  
Tel: (775) 688-3000 | Fax: (775) 688-3088  
[wwicker@woodburnandwedge.com](mailto:wwicker@woodburnandwedge.com)  
[jtafoya@woodburnandwedge.com](mailto:jtafoya@woodburnandwedge.com)

20 **MAYER BROWN LLP**

21 Lee Rubin (*pro hac vice* pending)  
22 Two Palo Alto Square, Suite 300  
3000 El Camino Real  
23 Palo Alto, CA 94306-2112  
[lrubin@mayerbrown.com](mailto:lrubin@mayerbrown.com)  
24 Rachel J. Lamorte (*pro hac vice* pending)  
1999 K Street, NW  
25 Washington, DC 20006-1101  
(202) 263-3000  
[rlamorte@mayerbrown.com](mailto:rlamorte@mayerbrown.com)

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

1      **FREE SPEECH FOR PEOPLE**

2      Amira Mattar (*pro hac vice* pending)

3      John Bonifaz (*pro hac vice* pending)

4      48 N. Pleasant Street, Suite 304

5      Amherst, MA 01002

6      (617) 244-0234

7      [amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)

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

9      *Attorneys for Intervenor-Defendant NAACP Tri-State*

10     *Conference of Idaho-Nevada-Utah*

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28