

REC'D & FILED

2025 JAN -8 AM 11:15

WILLIAM SCOTT HOEN
CLERK

BY  DEPUTY

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

MAYER BROWN LLP
Lee Rubin (*pro hac vice* pending)
Two Palo Alto Square, Suite 300
3000 El Camino Real
Palo Alto, CA 94306-2112
(650) 331-2000
lrubin@mayerbrown.com

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

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

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

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

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.

Plaintiffs,

Case No.: 24-OC-001531B

Dept. No.: 1

MOTION TO ASSOCIATE COUNSEL

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**

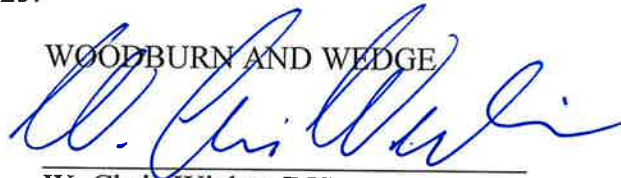
13 Intervenor-Defendant NAACP Tri-State Conference of Idaho-Nevada-Utah hereby moves
14 the Court for an order permitting **Rachel J. Lamorte, Esq.** to practice in Nevada pursuant to
15 Nevada Supreme Court Rule 42 (SCR 42). This motion is supported by the attached "Verified
16 Application for Association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

19 Affirmation Pursuant to NRS 239B.030

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

22 Dated this 7 day of January 2025.

23 WOODBURN AND WEDGE



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

Rachel J. Lamorte (*pro hac vice* pending)

1999 K Street, NW

Washington, DC 20006-1101

(202) 263-3000

rlamorte@mayerbrown.com

Robert C. Double III (*pro hac vice* pending)

333 South Grand Avenue, 47th Floor

Los Angeles, CA 90071

(213) 229-9500

rdouble@mayerbrown.com

FREE SPEECH FOR PEOPLE

Amira Mattar (*pro hac vice* pending)

John Bonifaz (*pro hac vice* pending)

48 N. Pleasant Street, Suite 304

Amherst, MA 01002

(617) 244-0234

amira@freespeechforpeople.org

jbonifaz@freespeechforpeople.org

Attorneys for Intervenor-Defendant

NAACP Tri-State Conference of Idaho-Nevada-Utah

1 **INDEX OF EXHIBITS**

2

<u>Exhibit</u>	<u>Description</u>	<u>Pages</u>
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

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

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

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
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
Attorneys for Defendant Francisco V Aguilar

Julie Harkleroad
Judicial Assistant to Hon. James Russell
First Judicial District Court, Dept. I
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
daniel@bravoschrager.com

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

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: 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

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

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
Sub Total :			\$550.00
Total :			\$550.00

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

Petitioner/Out-of-State Counsel Name

Rachel J. Lamorte

Petitioner/Out-of-State Counsel Email

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”



MAURA S. DOYLE
CLERK

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

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 or 617-557-1050.

Very truly yours,

A handwritten signature in black ink, appearing to read "Maura S. Doyle".

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
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

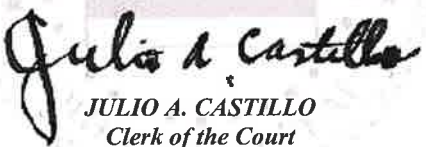


*On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,
the District of Columbia Bar does hereby certify that*

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.*


JULIO A. CASTILLO
Clerk of the Court

Issued By:



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

7 Zenaide Dagusen, Republic
8 National Committee

9 vs.

10 Francisco Aguilar, Democratic
11 National Committee

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

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

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

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

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

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

28 2. APPLYING ATTORNEY: Rachel Jennifer Lamorte, Esq.

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

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

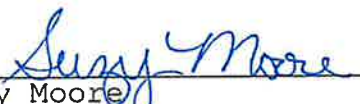
8
9 
10 Suzy Moore
11 Member Services Admin.
12 Pro Hac Vice Processor
13 STATE BAR OF NEVADA
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT “D”

EXHIBIT “D”

1
2
3
4
5
6 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

7 **IN AND FOR CARSON CITY**

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

13 Plaintiffs,

14 v.

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.

Case No.: 24-OC-001531B

Dept. No.: 1

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 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
20 Tel: (775) 688-3000 | Fax: (775) 688-3088
21 wwicker@woodburnandwedge.com
22 jtafoya@woodburnandwedge.com

23 **MAYER BROWN LLP**

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

1 **FREE SPEECH FOR PEOPLE**

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

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

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

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

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

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.

Plaintiffs,

Case No.: 24-OC-001531B

Dept. No.: 1

MOTION TO ASSOCIATE COUNSEL

1 vs.

2 FRANCISCO AGUILAR, in his official
3 capacity as Nevada Secretary of State;
4 DEMOCRATIC NATIONAL
5 COMMITTEE; and NEVADA STATE
6 DEMOCRATIC 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 **Robert C. Double III, Esq.** to practice in Nevada pursuant to
15 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
17 California, New York, Oregon, and Washington (**Exhibit B**), and the State Bar of Nevada
18 Statement (**Exhibit C**). A proposed Order Admitting to Practice is attached hereto as **Exhibit D**.

19 Affirmation Pursuant to NRS 239B.030

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

22 Dated this 7 day of January 2025.

23 WOODBURN AND WEDGE



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

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

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

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

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

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

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
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
Attorneys for Defendant Francisco V Aguilar

Julie Harkleroad
Judicial Assistant to Hon. James Russell
First Judicial District Court, Dept. I
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
daniel@bravoschrager.com

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

DATED this 9th day of January, 2025.



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

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

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
Sub Total			\$550.00
Total			\$550.00

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

Petitioner/Out-of-State Counsel Name

Robert C. Double

Petitioner/Out-of-State Counsel Email

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

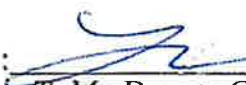
STATE OF CALIFORNIA

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 6th 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




Authorized Representative

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

ROBERT CHESTER DOUBLE III

The seal of the Supreme Court of the State of Washington is a circular emblem. It features a central portrait of George Washington, the first President of the United States, facing slightly to the right. The portrait is set against a blue background. Surrounding the portrait is a white ring containing the text "SEAL OF THE SUPREME COURT" at the top and "STATE OF WASHINGTON" at the bottom, separated by two small blue dots. The entire seal is enclosed within a blue circular border.

Sarkis

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

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

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

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

28 2. APPLYING ATTORNEY: Robert Chester Double, II 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

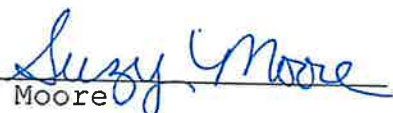
8
9 
10 Suzy Moore
11 Member Services Admin.
12 Pro Hac Vice Processor
13 STATE BAR OF NEVADA
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT “D”

EXHIBIT “D”

1
2
3
4
5
6 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
7 **IN AND FOR CARSON CITY**

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

Case No.: 24-OC-001531B

Dept. No.: 1

12 Plaintiffs,

13 vs.

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

17 Defendants,

18 and

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

21 Defendant-Intervenor.

22 **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 ROBERT C. DOUBLE, III, ESQ. to practice in Nevada pursuant to Nevada Supreme
27 Court Rule 42. Intervenor-Defendant's Motion was accompanied with a Verified Application for
28 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 _____
DISTRICT COURT JUDGE

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
jtafoya@woodburnandwedge.com

20 **MAYER BROWN LLP**

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

1 **FREE SPEECH FOR PEOPLE**

Amira Mattar (*pro hac vice* pending)

2 John Bonifaz (*pro hac vice* pending)

3 48 N. Pleasant Street, Suite 304

Amherst, MA 01002

4 (617) 244-0234

amira@freespeechforpeople.org

5 jbonifaz@freespeechforpeople.org

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

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

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
8 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
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
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

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

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

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.

Plaintiffs,

Case No.: 24-OC-001531B

Dept. No.: 1

MOTION TO ASSOCIATE COUNSEL

REC'D & FILED

2025 JAN -8 AM 11:15

WILLIAM SCOTT HOEN
CLERK

BY: 

DEPUTY

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 **Lee H. Rubin, 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 California and
17 Washington D.C. (**Exhibit B**), and the State Bar of Nevada Statement (**Exhibit C**). A proposed
18 Order Admitting to Practice is attached hereto as **Exhibit D**.

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

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

22 Dated this 7 day of January 2025.

23 WOODBURN AND WEDGE

24 

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

MAYER BROWN LLP

Lee Rubin (*pro hac vice* pending)

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

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

FREE SPEECH FOR PEOPLE
Amira Mattar (*pro hac vice* pending)
John Bonifaz (*pro hac vice* pending)
48 N. Pleasant Street, Suite 304
Amherst, MA 01002
(617) 244-0234
amira@freespeechforpeople.org
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 and Washington D.C.	2
C	State Bar of Nevada Statement	2
D	Proposed Order Admitting to Practice	3

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

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
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
Attorneys for Defendant Francisco V Aguilar

Julie Harkleroad
Judicial Assistant to Hon. James Russell
First Judicial District Court, Dept. I
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
daniel@bravoschrager.com

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

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: 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

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>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

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
Sub Total			\$550.00
Total			\$550.00

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

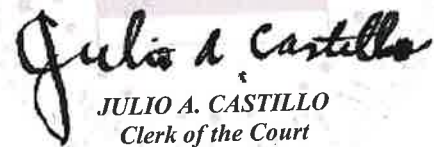


*On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,
the District of Columbia Bar does hereby certify that*

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.*


JULIO A. CASTILLO
Clerk of the Court

Issued By:



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

7 Zenaide Dagusen, Republic
8 National Committee

9 vs.

10 Francisco Aguilar, Democratic
11 National Committee

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

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

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

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

23 (b) **Burden on applicant.** The applicant shall have the
24 burden to establish special circumstances and good cause
25 for an appearance in excess of the limitation set forth
26 in subsection 6(a) of this rule. The applicant shall set
27 forth the special circumstances and good cause in an
28 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

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

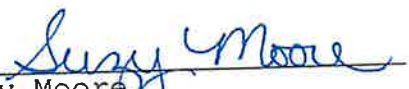
8
9 
10 Suzy Moore
11 Member Services Admin.
12 Pro Hac Vice Processor
13 STATE BAR OF NEVADA
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT “D”

EXHIBIT “D”

1
2
3
4
5
6
7 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
8 **IN AND FOR CARSON CITY**

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

13 Plaintiffs,

14 v.

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

18 Defendants,

19 and

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

22 Defendant-Intervenor.

Case No.: 24-OC-001531B

Dept. No.: 1

23 **ORDER ADMITTING TO PRACTICE**

24 Currently before this Court is a *Motion to Associate Counsel* ("Motion") filed by
25 Intervenor-Defendant NAACP Tri-State Conference of Idaho-Nevada-Utah ("Intervenor-
26 Defendant") on January 7, 2025. Intervenor-Defendant requests an Order from this Court
27 permitting LEE H. RUBIN, ESQ. to practice in Nevada pursuant to Nevada Supreme Court Rule
28 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.**

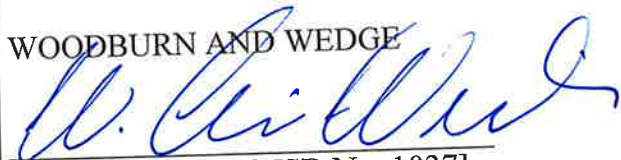
7 **IT IS HEREBY FURTHER ORDERED** that **LEE H. RUBIN, ESQ.** is hereby admitted
8 to practice in the above-entitled Court on behalf of Intervenor-Defendant for the purposes of the
9 above-entitled matter only.

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
20 Tel: (775) 688-3000 | Fax: (775) 688-3088
21 wwicker@woodburnandwedge.com
22 jtafoya@woodburnandwedge.com

23 **MAYER BROWN LLP**

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

1 **FREE SPEECH FOR PEOPLE**

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 *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

REC'D & FILED

2025 JAN -8 AM 11:15

WILLIAM SCOTT HOEN
CLERK

BY

DEPUTY

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

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

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

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

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.

Plaintiffs,

Case No.: 24-OC-001531B

Dept. No.: 1

MOTION TO ASSOCIATE COUNSEL

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
18 proposed Order Admitting to Practice is attached hereto as **Exhibit D**.

19 Affirmation Pursuant to NRS 239B.030

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

22 Dated this 7 day of January 2025.

23 WOODBURN AND WEDGE



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)

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

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

FREE SPEECH FOR PEOPLE

Amira Mattar (*pro hac vice* pending)
John Bonifaz (*pro hac vice* pending)
48 N. Pleasant Street, Suite 304
Amherst, MA 01002
(617) 244-0234
amira@freespeechforpeople.org
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 New York and Washington	2
C	State Bar of Nevada Statement	2
D	Proposed Order Admitting to Practice	3

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

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
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
Attorneys for Defendant Francisco V Aguilar

Julie Harkleroad
Judicial Assistant to Hon. James Russell
First Judicial District Court, Dept. I
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
daniel@bravoschrager.com

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

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

DATED this 9th 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

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

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

Suzy Moore

From: SBN Website <noreply@nvbar.org>
Sent: 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

Petitioner/Out-of-State Counsel Name

Amira Mattar

Petitioner/Out-of-State Counsel Email

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

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

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

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

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

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

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

1 3. FIRM NAME AND ADDRESS: Free Speech For People, 48 N. Pleasant
2 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
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT “D”

EXHIBIT “D”

1
2
3
4
5
6 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

7 **IN AND FOR CARSON CITY**

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

12 Plaintiffs,

13 v.

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

17 Defendants,

18 and

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

21 Defendant-Intervenor.

Case No.: 24-OC-001531B

Dept. No.: 1

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
20 Tel: (775) 688-3000 | Fax: (775) 688-3088
21 wwicker@woodburnandwedge.com
22 jtafoya@woodburnandwedge.com

23 **MAYER BROWN LLP**

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

1 **FREE SPEECH FOR PEOPLE**

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

(617) 244-0234

amira@freespeechforpeople.org

jbonifaz@freespeechforpeople.org

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

8

9

10

11

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 / DEN
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
8 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
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
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

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

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

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.

Plaintiffs,

Case No.: 24-OC-001531B

Dept. No.: 1

MOTION TO ASSOCIATE COUNSEL

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
18 Practice is attached hereto as **Exhibit D**.

19 Affirmation Pursuant to NRS 239B.030

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

22 Dated this 7 day of January 2025.

23 WOODBURN AND WEDGE

24 

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

27 **MAYER BROWN LLP**

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

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

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

FREE SPEECH FOR PEOPLE

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

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

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
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
Attorneys for Defendant Francisco V Aguilar

Julie Harkleroad
Judicial Assistant to Hon. James Russell
First Judicial District Court, Dept. I
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
daniel@bravoschrager.com

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

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

DATED this 21st day of January, 2025.


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

jbbonifaz@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

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
XXXXXXXXXX3000

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
Sub Total			\$550.00
Total			\$550.00

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

Petitioner/Out-of-State Counsel Name

John Bonifaz

Petitioner/Out-of-State Counsel Email

jbbonifaz@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”

1 STAT

2
3 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
4 IN AND FOR THE COUNTY OF CARSON CITY

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

7 Zenaida Dagusen, Republic
8 National Committee

9 vs.

10 Francisco Aguilar, Democratic
11 National Committee

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

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

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

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

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

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

28 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

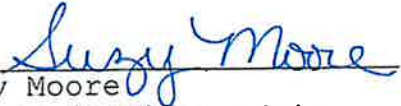
8
9 
10 Suzy Moore
11 Member Services Admin.
12 Pro Hac Vice Processor
13 STATE BAR OF NEVADA
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT “D”

EXHIBIT “D”

1
2
3
4
5
6 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

7 **IN AND FOR CARSON CITY**

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

12 Plaintiffs,

13 v.

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

17 Defendants,

18 and

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

21 Defendant-Intervenor.

Case No.: 24-OC-001531B

Dept. No.: 1

22
23 **ORDER ADMITTING TO PRACTICE**

24 Currently before this Court is a *Motion to Associate Counsel* (“Motion”) filed by
25 Intervenor-Defendant NAACP Tri-State Conference of Idaho-Nevada-Utah (“Intervenor-
26 Defendant”) on January 7, 2025. Intervenor-Defendant requests an Order from this Court
27 permitting JOHN C. BONIFAZ, ESQ. to practice in Nevada pursuant to Nevada Supreme Court
28 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
20 Tel: (775) 688-3000 | Fax: (775) 688-3088
21 wwicker@woodburnandwedge.com
22 jtafoya@woodburnandwedge.com

23 **MAYER BROWN LLP**

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

1 **FREE SPEECH FOR PEOPLE**

Amira Mattar (*pro hac vice* pending)

2 John Bonifaz (*pro hac vice* pending)

3 48 N. Pleasant Street, Suite 304

Amherst, MA 01002

4 (617) 244-0234

amira@freespeechforpeople.org

5 jbonifaz@freespeechforpeople.org

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

7 *Conference of Idaho-Nevada-Utah*

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28