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HOLLAND & HART LLP  
Christopher M. Jackson (*pro hac vice* forthcoming)  
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Denver, CO 80202  
Tel: (303) 295-8000  
cmjackson@hollandhart.com

*Attorneys for Plaintiffs*

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

NATIONAL TAXPAYERS UNION, a non-  
profit organization, and ROBIN L. TITUS,  
MD,

Plaintiffs,

v.

THE STATE OF NEVADA, ex, rel., JOSEPH  
LOMBARDO, in his official capacity as  
Governor of the State of Nevada; ZACH  
CONINE, in his official capacity as Nevada  
State Treasurer; RICHARD WHITLEY, in his  
official capacity as Director of the Nevada  
Department of Human Services; STACIE  
WEEKS, in her official capacity as Director of  
the Nevada Health Authority; NED GAINES,  
in his official capacity as the Acting Nevada  
Commissioner of Insurance; and JANEL  
DAVIS, in her official capacity as Acting  
Executive Director of the Silver State Health  
Insurance Exchange,

Defendants.

Case No. 25 OC 00109 1B

Dept. No. 1

**MOTION TO ASSOCIATE COUNSEL**

Plaintiffs National Taxpayers Union and Robin L. Titus, MD, by and through counsel,  
move the Court for an order permitting Christopher M. Jackson, Esq., to practice in Nevada  
pursuant to Nevada Supreme Court Rule 42 (SCR 42). This Motion is supported by the attached

REC'D & FILED

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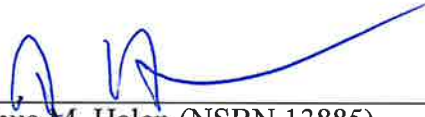
WILLIAM SCOTT HOEN  
CLERK

BY E. H. H.  
DEPUTY

1 Verified Application for Association of Counsel, **Exhibit 1**; Certificate of Good Standing from  
2 Colorado, **Exhibit 2**; State Bar of Nevada Statement, **Exhibit 3**; and Proposed Order Admitting  
3 to Practice, **Exhibit 4**.

4  
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6 DATE: September 22, 2025

HOLLAND & HART LLP

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9   
10 Joshua M. Halen (NSBN 13885)  
11 5470 Kietzke Lane, Suite 100  
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17 Denver, CO 80202  
18 Tel: (303) 295-8000  
19 Fax: (303) 295-8261

20 *Attorneys for Plaintiffs*  
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**CERTIFICATE OF SERVICE**

I, Cathy Ryle, certify:

I am employed in the City of Reno, County of Washoe, State of Nevada by the law offices of Holland & Hart LLP. My business address is 5470 Kietzke Lane, Suite 100, Reno, Nevada 89511. I am over the age of 18 years and not a party to this action.

On September 17, 2025, I caused the foregoing **MOTION TO ASSOCIATE COUNSEL**, to be served by the following methods(s):

☐ U.S. Mail: a true and correct copy was placed in Holland & Hart LLP's outgoing mail in a sealed envelope addressed as follows:

Jeffery M. Conner (NSBN 11543)  
Chief Deputy Solicitor General  
State of Nevada  
Office of the Attorney General  
100 North Carson Street  
Carson City, Nevada 89701-4717  
Tel: (775) 684-1136  
jconner@ag.nv.gov

XX E-Mail: By e-mailing a true copy thereof to the following person(s) at the following e-mail addresses, pursuant to NRCP 5(b)(F):

Jeffery M. Conner (NSBN 11543)  
Chief Deputy Solicitor General  
jconner@ag.nv.gov

Cathy Ryle   
An Employee of Holland & Hart LLP

35780012\_v1

HOLLAND & HART LLP  
5470 KIETZKE LANE, SUITE 100  
RENO, NV 89511

# EXHIBIT 1

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

NATIONAL TAXPAYER UNION )  
and ROBIN TITUS, )  
 )  
Plaintiffs, )

vs. )

Case No. 24 OC 00109 1B  
Dept. No. 1

THE STATE OF NEVADA, ex, rel., )  
JOSEPH LOMBARDO, in his )  
official capacity as Governor of the )  
State of Nevada; ZACH CONINE )  
in his official capacity as Nevada )  
Department of Health and Human )  
Services; SCOTT J. KIPPER, in his )  
official capacity as the Nevada )  
Commissioner of Insurance; and )  
RUSELL COOK, in his official )  
capacity as Executive Director of the )  
State Health Insurance Exchange )  
Defendants. )

**VERIFIED APPLICATION FOR ASSOCIATION  
OF COUNSEL UNDER NEVADA SUPREME COURT RULE 42**

Christopher Michael Lauvane Jackson, Petitioner, respectfully represents:  
First Middle Last

1. Petitioner is an attorney at law and a member of the law firm of: Holland & Hart, LLP

with offices at 555 17th Street, Suite 3200  
Street Address

Denver, Denver, Colorado, 80202  
City County State Zip Code

(303) 295-3000, cmjackson@hollandhart.com  
Telephone Email

2. Petitioner has been retained personally or as a member of the above-named law firm by \_\_\_\_\_  
National Taxpayers Union and Robin Titus to  
provide legal representation in connection with the above-entitled matter now pending before the above  
referenced court.

3. Since December 8 of 2015, petitioner has been, and presently is, a member of good standing of  
the bar of the highest court of the State of Colorado where petitioner regularly practices law.

4. Petitioner was admitted to practice before the following United States District Courts, United States  
Circuit Courts of Appeal, the Supreme Court of the United States, and/or courts of other states on the  
dates indicated for each, and is presently a member in good standing of the bars of said Courts:

	<u>DATE ADMITTED</u>
<u>Supreme Court of Virginia</u>	<u>10-14-2011</u>
<u>United States Court of Appeals for the Fourth Circuit</u>	<u>09-06-2012</u>
<u>United States District Court of Columbia</u>	<u>05-10-2013</u>
<u>United States Court of Appeals for the Tenth Circuit</u>	<u>03-02-2015</u>
<u>United States District Court for the Eastern District of Wisconsin</u>	<u>06-18-2015</u>
<u>United States District Court for the District of Colorado</u>	<u>09-03-2015</u>
<u>United States Court of Appeals for the Federal Circuit</u>	<u>05-23-2017</u>
<u>United States Supreme Court</u>	<u>10-01-2018</u>
<u>United States Court of Appeals for the Eighth Circuit</u>	<u>05-05-2021</u>

5. Is Petitioner currently suspended or disbarred in any court? You must answer yes or no. If yes, give  
particulars; e.g., court, jurisdiction, date: No

6. Is Petitioner currently subject to any disciplinary proceedings by any organization with authority at  
law? You must answer yes or no. If yes, give particulars, e.g. court, discipline authority, date, status: No

7. Has Petitioner ever received public discipline including, but not limited to, suspension or disbarment, by any organization with authority to discipline attorneys at law? You must answer yes or no. If yes, give particulars, e.g. court, discipline authority, date, status: No

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8. Has Petitioner ever had any certificate or privilege to appear and practice before any regulatory administrative body suspended or revoked? You must answer yes or no. If yes, give particulars, e.g. date, administrative body, date of suspension or reinstatement: No

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9. Has Petitioner, either by resignation, withdrawal, or otherwise, ever terminated or attempted to terminate Petitioner's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings? You must answer yes or no. If yes, give particulars: No

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10. Petitioner has filed the following application(s) to appear as counsel under Nevada Supreme Court Rule 42 during the past three (3) years in the following matter(s), if none, indicate so: *(do not include pro hac submitted to federal courts)*

<u>Date of Application</u>	<u>Cause/Case No.</u>	<u>Title of Court Administrative Body or Arbitrator</u>	<u>Was Application Granted or Denied?</u>
<u>1/23/2024</u>	<u>24 OC 00001 1B</u>	<u>First Judicial District Court</u>	<u>2/29/2024</u>

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(If more space is needed, you may list previous applications on a separate attachment.)

11. Nevada Counsel of Record for Petition in this matter is:

(must be the same as the signature on the Nevada Counsel consent page)

<u>Joshua</u>	<u>M.</u>	<u>Halen</u>	<u>13885</u>
First Name	Middle Name	Last Name	NV Bar #

who has offices at Holland & Hart, LLP  
Firm Name/Company

<u>5470 Kietzke Ln, Suite 100</u>	<u>Reno</u>	<u>Washoe</u>
Street Address	City	County

<u>89511</u>	<u>(775) 327-3000</u>
Zip Code	Phone Number

12. Petitioner agrees to comply with the provisions of Nevada Supreme Court Rule 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.

13. 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.



## **Creed of Professionalism and Civility**

### **PREAMBLE**

A lawyer should always show personal courtesy and professional integrity in the fullest sense of those terms.

In fulfilling our duty to represent a client vigorously as lawyers, we will honor our obligations to the administration of justice in a rational, peaceful, and efficient manner. We remain committed to the rule of law as the foundation for a just and peaceful society.

Lawyers should exhibit courtesy, candor, and cooperation when participating in the legal system and dealing with the public. In addition, lawyers should demonstrate civility, professional integrity, personal dignity, and respect because these qualities are essential to the fair administration of justice and conflict resolution.

The Rules of Professional Conduct cannot address every conflict that may arise. These standards honor the spirit of the Rules by balancing a lawyer's obligation to protect and pursue a client's legitimate interests zealously, within the bounds of the law, while maintaining a professional, courteous, and civil attitude toward all persons in the legal system, as well as avoid the appearance of impropriety. Violations of these standards may trigger sanctions under Rules 4.4, 8.4(b), or others.

### **CREED**

1. We will strive to find harmony in our responsibilities as a representative of clients, as officers of the legal system, and as public citizens.
2. We will treat all participants of the legal system in a civil and courteous manner, not only in court, but also in all other written and oral communications refraining from disparaging personal remarks or acrimony.
3. We will not encourage or knowingly authorize any person under our control to engage in uncivil conduct.
4. We will not, absent good cause, attribute bad motives or improper conduct to other counsel nor bring the profession into disrepute by unfounded accusations of impropriety.
5. We will adhere to promises and agreements fairly reached, whether orally or in writing, in good faith. When reiterating oral promises or agreements in writing, we will fairly, completely, and in good faith, restate all elements of the parties' oral agreement.
6. We will confer early with other counsel to assess settlement possibilities. We will not falsely hold out the possibility of settlement to adjourn discovery or to delay trial.
7. We will stipulate to undisputed matters unless we have a good-faith basis not to stipulate.
8. We will try in good faith to resolve our objections with opposing counsel.
9. We will not time the filing or service of motions or pleadings in any way that unfairly limits another party's opportunity to respond nor will we request an extension of time without just cause.

10. We will consult other counsel regarding scheduling matters in a good-faith effort to avoid scheduling conflicts.
11. We will endeavor to accommodate previously scheduled dates for hearings, depositions, meetings, conferences, vacations, seminars, or other functions of other counsel.
12. We will explain to our clients that cooperation is the professional norm. We will explain how procedural agreements do not compromise the clients' interests.
13. We will draft document requests and interrogatories without placing an undue burden or expense on any party.
14. We will ensure that our clients respond to document requests and interrogatories without strained interpretation. We will not produce documents nor answer interrogatories in a manner designed to hide or obscure the existence of documents or information.
15. We will be punctual and prepared for all Court appearances so that all hearings, conferences, and trials may commence on time.
16. We will not engage in conduct that brings disorder or disruption to the legal proceeding. We will advise our clients and witnesses of the proper conduct expected and, to the best of our ability, prevent our clients and witnesses from creating disorder or disruption.

#### IN SUMMARY

In summary, consistent with the lawyer's oath, lawyers are expected to commit to the spirit and letter of these standards, affirming that these guidelines do not denigrate the lawyer's duty of zealous representation. Law schools and continuing legal education courses should incorporate these standards when teaching professionalism to law students and practicing lawyers alike. Lawyers should make copies available to clients and adjudicators should reinforce these standards in the courtroom to reinforce our obligation to maintain and foster these standards and to make it clear that incivility may hurt the client's case.

of this application and the following statements are true:

Christopher M.L. Jackson

- 1) That I am the Petitioner in the above-entitled matter.
- 2) That I have received a copy of, read, and will adhere to the Nevada Creed of Professionalism and Civility.
- 3) That I have read Supreme Court Rule (SCR) 42 and meet all requirements contained therein, including, without limitation, the requirements set forth in SCR 42(2), as follows:
  - (A) I am not a member of the State Bar of Nevada;
  - (B) I am not a resident of the State of Nevada;
  - (C) I am not regularly employed as a lawyer in the State of Nevada;
  - (D) I am not engaged in substantial business, professional, or other activities in the State of Nevada;
  - (E) I am a member in good standing and eligible to practice before the bar of any jurisdiction of the United States; and
  - (F) I have associated a lawyer who is an active member in good standing of the State Bar of Nevada as counsel of record in this action or proceeding.
- 4) That 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.

That 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; that I understand and shall comply with the standards of professional conduct required by members of the State Bar of Nevada; and that 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.

**If executed in Nevada:** "I declare under penalty of perjury that the foregoing is true and correct."

Executed on (Date) 8/13/25

Attorney Signature 

**If executed outside** of the state of Nevada, except as otherwise provided in NRS 53.250 to 53.390, inclusive, "I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct."

Executed on (Date) 8/11/25

Attorney Signature 

## DESIGNATION, CERTIFICATION AND CONSENT OF NEVADA COUNSEL

SCR 42(14) Responsibilities of Nevada attorney of record.

(a) 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.

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

(c) 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 Nevada counsel to ensure that the proceeding is tried and managed in accordance with all applicable Nevada procedural and ethical rules.

I Joshua M. Halen hereby agree to associate with Petitioner referenced above

Print Nevada Counsel Name

and further agree to perform all duties and responsibilities as required by Nevada Supreme Court Rule 42.

**If executed in Nevada:** "I declare under penalty of perjury that the foregoing is true and correct."

Executed on (Date) 8/25/25

Attorney Signature 


**If executed outside** of the state of Nevada, except as otherwise provided in NRS 53.250 to 53.390, inclusive, "I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct."

Executed on (Date) \_\_\_\_\_

Attorney Signature \_\_\_\_\_

# EXHIBIT 2

# SUPREME COURT



## State of Colorado,

STATE OF COLORADO, ss:

I, Cheryl Stevens, Clerk of the Supreme Court of the State  
of Colorado, do hereby certify that

Christopher Michael Lauvane Jackson

has been duly licensed and admitted to practice as an

### ATTORNEY AND COUNSELOR AT LAW

within this State; and that his/her name appears upon the Roll of  
Attorneys

and Counselors at Law in my office of date the 8<sup>th</sup>

day of December A.D. 2015 and that at the date

hereof the said Christopher Michael Lauvane Jackson is in good

standing at this Bar.



IN WITNESS WHEREOF, I have hereunto subscribed my name and  
affixed the Seal of said Supreme Court, at Denver, in said State, this

25<sup>th</sup> day of August A.D. 2025

Cheryl Stevens

Clerk

By



Deputy Clerk

# EXHIBIT 3



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 00109 1B  
6 Dept. No. 1

7 National Taxpayer Union  
8 and Robin Titus

9 vs.

10 The State of Nevada

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

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

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

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

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

1. DATE OF APPLICATION: 8/21/2025

2. APPLYING ATTORNEY: Christopher Michael Lauvane Jackson, Esq.

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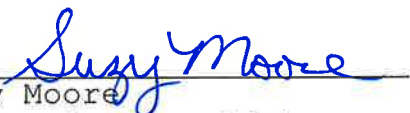
1 3. FIRM NAME AND ADDRESS: Holland & Hart, LLP, 555 17th Street,  
2 Suite 3200, Denver, CO 80202

3 4. NEVADA COUNSEL OF RECORD: Joshua Michael Halen, Esq., Holland &  
4 Hart LLP, 5470 Kietzke Ln, Suite 100, Reno, NV 89511

5 5. In addition to the present application, petitioner made the  
6 following previous applications within the last three years:

7 **1/23/2024 ADMISSION GRANTED**

8 DATED this August 28, 2025

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11 Suzy Moore  
12 Member Service Admin.  
13 Pro Hac Vice Processor  
14 STATE BAR OF NEVADA  
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# EXHIBIT 4

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

NATIONAL TAXPAYERS UNION, a non-  
profit organization, and ROBIN L. TITUS,  
MD,

Plaintiffs,

v.

THE STATE OF NEVADA, ex, rel., JOSEPH  
LOMBARDO, in his official capacity as  
Governor of the State of Nevada; ZACH  
CONINE, in his official capacity as Nevada  
State Treasurer; RICHARD WHITLEY, in his  
official capacity as Director of the Nevada  
Department of Human Services; STACIE  
WEEKS, in her official capacity as Director of  
the Nevada Health Authority; NED GAINES,  
in his official capacity as the Acting Nevada  
Commissioner of Insurance; and JANEL  
DAVIS, in her official capacity as Acting  
Executive Director of the Silver State Health  
Insurance Exchange,

Defendants.

Case No. 25 OC 00109 1B

Dept. No. 1

**ORDER ADMITTING TO PRACTICE**

Plaintiffs National Taxpayers Union and Robin L. Titus, MD, having filed their Motion  
to Associate Counsel Christopher M. Jackson, Esq., under Nevada Supreme Court Rule 42,  
together with a Verified Application for Association of Counsel, Certificate of Good Standing  
for the State Bar of Colorado, and the State Bar of Nevada Statement; said Motion having been

1 served, no objections having been made, and the Court being fully apprised in the premises, and  
2 good cause appearing, it is hereby

3 ORDERED, that said Motion to Associate Counsel is hereby granted, and Christopher M.  
4 Jackson, Esq., is hereby admitted to practice in the above-entitled Court for the purposes of the  
5 above-entitled matter only.  
6

7 DATED this \_\_\_\_ day of \_\_\_\_\_, 2025.

8  
9 \_\_\_\_\_  
10 DISTRICT COURT JUDGE  
11

12 Submitted by:

13 /s/ Joshua M. Halen  
14 Joshua M. Halen (NSBN 13885)  
15 5441 Kietzke Lane, 2nd Floor  
16 Reno, NV 89511  
17 Tel: (775) 327-3000  
18 Fax: (775) 786-6179

19 Christopher M. Jackson (pro hac vice forthcoming)  
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