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REC'D & FILED

2025 SEP 22 PM 4:21

WILLIAM SCOTT HOEN

CLERK

BY Etain
DEPUTY

5 HOLLAND & HART LLP
6 Christopher M. Jackson (*pro hac vice* forthcoming)
7 555 17th Street, Suite 3200
8 Denver, CO 80202
9 Tel: (303) 295-8000
cmjackson@hollandhart.com

10 *Attorneys for Plaintiffs*

FIRST JUDICIAL DISTRICT COURT OF NEVADA
IN AND FOR CARSON CITY

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

14 Plaintiffs,

15 v.

16 THE STATE OF NEVADA, ex, rel., JOSEPH
17 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,

18 Defendants.

19 Case No. 25 OC 00109 1B

20 Dept. No. 1

MOTION TO ASSOCIATE COUNSEL

21 Plaintiffs National Taxpayers Union and Robin L. Titus, MD, by and through counsel,
22 move the Court for an order permitting Christopher M. Jackson, Esq., to practice in Nevada
23 pursuant to Nevada Supreme Court Rule 42 (SCR 42). This Motion is supported by the attached
24

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

5

6 DATE: September 22, 2025

7 HOLLAND & HART LLP

8 
9 Joshua M. Halen (NSBN 13885)
10 5470 Kietzke Lane, Suite 100
11 Reno, NV 89511
12 Tel: (775) 327-3000
13 Fax: (775) 786-6179

14 Christopher M. Jackson (*pro hac vice* forthcoming)
15 555 17th Street, Suite 3200
16 Denver, CO 80202
17 Tel: (303) 295-8000
18 Fax: (303) 295-8261

19

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Attorneys for Plaintiffs

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 method(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 (ISBN 11543)
Chief Deputy Solicitor General
jconner@ag.nv.gov

Cathy Ryle
An Employee of Holland & Hart LLP

35780012_v1

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.)
)
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.)
)

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

**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:

DATE ADMITTED

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

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 _____

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 _____

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 _____

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 hacis 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>
1/23/2024	24 OC 00001 1B	First Judicial District Court	2/29/2024

(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)

First Name	Middle Name	Last Name	NV Bar #
Joshua	M.	Halen	13885

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

5470 Kietzke Ln, Suite 100, Reno, Washoe,
Street Address City County

89511, (775) 327-3000.
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:

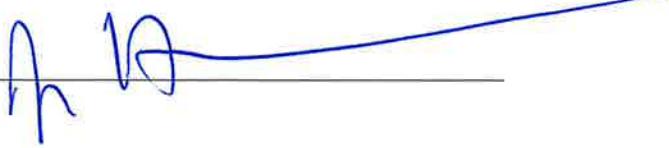
Christopher M. L. Jackson

- 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

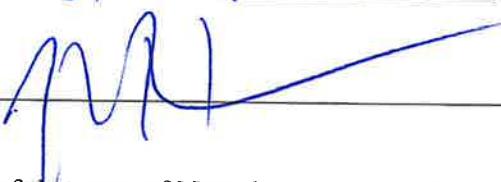
and further agree to perform all duties and responsibilities as required by Nevada Supreme Court Rule 42.

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

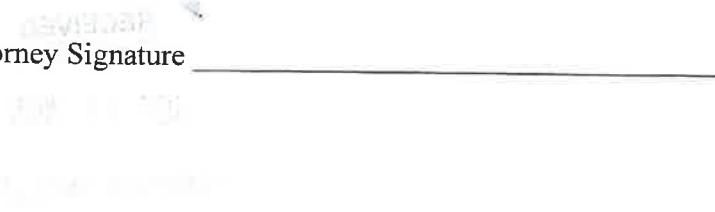
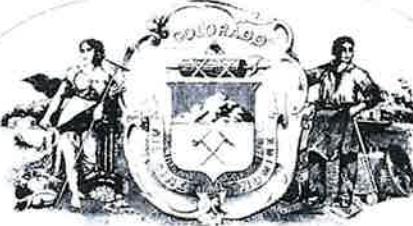


EXHIBIT 2

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 8th 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

25th day of August A.D. 2025

Cheryl Stevens

Cheryl Stevens
Clerk

By _____



Deputy Clerk
Deputy Clerk

EXHIBIT 3

1 STAT

2

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

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

6 National Taxpayer Union
7 and Robin Titus

8 vs.

9 The State of Nevada

10

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

12

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
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.

19 (a) **Limitation.** It shall be presumed, absent special
20 circumstances, and only upon showing of good cause, that
21 more than 5 appearances by any attorney granted under
22 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
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.

26 1. DATE OF APPLICATION: 8/21/2025

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

28 ///

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

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

EXHIBIT 4

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

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

Case No. 25 OC 00109 1B

12 v.
13 Plaintiffs,

Dept. No. 1

14 THE STATE OF NEVADA, ex, rel., JOSEPH
15 LOMBARDO, in his official capacity as
16 Governor of the State of Nevada; ZACH
17 CONINE, in his official capacity as Nevada
18 State Treasurer; RICHARD WHITLEY, in his
19 official capacity as Director of the Nevada
20 Department of Human Services; STACIE
21 WEEKS, in her official capacity as Director of
22 the Nevada Health Authority; NED GAINES,
23 in his official capacity as the Acting Nevada
24 Commissioner of Insurance; and JANEL
25 DAVIS, in her official capacity as Acting
26 Executive Director of the Silver State Health
27 Insurance Exchange,

Defendants.

ORDER ADMITTING TO PRACTICE

21
22 Plaintiffs National Taxpayers Union and Robin L. Titus, MD, having filed their Motion
23 to Associate Counsel Christopher M. Jackson, Esq., under Nevada Supreme Court Rule 42,
24 together with a Verified Application for Association of Counsel, Certificate of Good Standing
25 for the State Bar of Colorado, and the State Bar of Nevada Statement; said Motion having been
26
27
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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 DISTRICT COURT JUDGE

10
11 Submitted by:

12
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

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