



1 **OPP**
2 ADAM R. FULTON, ESQ.
3 Nevada Bar No. 11572
4 E-mail: afulton@jfnvlaw.com
5 LOGAN G. WILLSON, ESQ.
6 Nevada Bar No. 14967
7 E-mail: logan@jfnvlaw.com
8 **JENNINGS & FULTON, LTD.**
9 2580 Sorrel Street
10 Las Vegas, Nevada 89146
11 Telephone: (702) 979-3565
12 Facsimile: (702) 362-2060
13 *Attorneys for Plaintiffs*

DISTRICT COURT
CLARK COUNTY, NEVADA

14 SCOTT GOLDMAN, an individual;
15 ALENA SHEEHAN, an individual;
16 GREGG SEYMOUR, an individual;
17 KIMBERLY FERGUS, an individual;
18 PATTY JANE (PJ) BELANGER, an
19 individual; EMILEANNE ENCE, an
20 individual; MARIE ARNOLD, an
21 individual; PAM NORMAN, an
22 individual; CRISTINA VON
23 LINDENBERG, an individual;
24 GREGORY RANGLES, an individual;
25 ALAN RYAN VINCENT, an individual;
26 CYRUS HOJJATY, an individual;
27 BRIDGET HOLDAR, an individual;
28 HEATHER FLORIAN, an individual;
TIMOTHY WAGNER, an individual;
DESIREE DESTEFANO, an individual;
MARTIN WALDMAN, an individual;
VEM MILLER, an individual;
DANIELLE KEAR, an individual;
DOUGLAS RANGLES, an individual;
SUSAN PROFFITT, an individual;
KRISTENE HONZIK, an individual;
JENNIFER ROWE, an individual;
PAMELA BENNETTS, an individual;
ROBERT MOORHEAD, JR., an
individual; MARIA THERESA F. DIAZ,
an individual; ALEXANDREA SLACK,
an individual; JONATHAN MAXHAM,
an individual; MARGARET WHITE, an
individual; PERANUT SAE-ANG, an
individual; CAROLYN VANZLOW, an

CASE NO.: A-22-851189-C

DEPT. NO.: 17

**PLAINTIFFS' OPPOSITION TO
MOTION TO INTERVENE AS
DEFENDANT**

1 individual; BRIAN COULTER, an
2 individual; HEIDI CLINGEN, an
3 individual;

4 Plaintiffs,

5 v.

6 BARBARA CEGAVSKE, in her official
7 capacity as Nevada Secretary of State;
8 JOSEPH P. GLORIA, in his official
9 capacity as Registrar of Voters for Clark
10 County, Nevada; DOES I-X, inclusive;
11 and ROE CORPORATIONS I-X,
12 inclusive,

13 Defendants.

14 Plaintiffs, by and through their attorneys of record, ADAM R. FULTON, ESQ. and
15 LOGAN WILLSON, ESQ., of the law firm of JENNINGS & FULTON, LTD., hereby file this
16 Opposition to Motion to Intervene as Defendant.

17 This Opposition is made and based upon the papers and pleadings on file herein, the
18 Memorandum of Points and Authorities, the attached exhibits, and any oral argument the
19 Court will permit at the hearing on this matter.

20 Dated: May 9th, 2022

JENNINGS & FULTON, LTD.

21 By: /s/ Adam R. Fulton

22 Adam R. Fulton, Esq.
23 Nevada Bar No. 11572
24 afulton@jfnvlaw.com
25 Logan G. Willson, Esq.
26 Nevada Bar No. 14967
27 logan@jfnvlaw.com
28 2580 Sorrel Street
Las Vegas, Nevada 89146
Telephone: (702) 979-3565
Facsimile: (702) 362-2060
Attorneys for Plaintiffs

JENNINGS & FULTON, LTD.
2580 SORREL STREET
LAS VEGAS, NEVADA 89146
TELEPHONE 702 979 3565 ♦ FAX 702 362 2060

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MEMORANDUM OF POINTS & AUTHORITIES

I. INTRODUCTION

This matter stems from Plaintiffs requesting to exercise their statutory right to meaningfully observe the upcoming elections with no response from Defendants. For months following the November 3, 2020 election (“2020 Election”), numerous cases were filed across the country alleging election misconduct, fraud, and impropriety across the board. Throughout the initial voting process and the ensuing recounts and audits, numerous allegations of improper ballot counts arose. Part of those allegations centered on the fact that many jurisdictions failed to provide the general public “meaningful observation” of the ballot counting process, and Clark County was no exception.

Proposed Intervenor-Defendant Progressive Leadership Alliance of Nevada (“PLAN”) claims that, “Plaintiffs’ lawsuit aims to upend election processes in Clark County in ways that threaten to interfere with an orderly election based on nothing more than disproven allegations and conspiracy theories.” See May 2, 2022 Motion to Intervene at 4:4-5. This is blatantly false. Not only does PLAN not have any significant nor distinct legal interest, PLAN exclusively relies on an unpublished opinion in *Kraus v. Cegavske, et al.* and seeks to universally apply a case with no factual similarity to the present matter.

Even as persuasive authority, *Kraus* involved the Appellants filing an emergency motion seeking immediate relief under NRAP 8, pending appeal, prohibiting the Clark County Registrar from continuing to duplicate mail ballots unless observers are granted an opportunity to meaningfully observe the process and from using artificial intelligence to authenticate ballot signatures. *Kraus v. Cegavske*, No. 82018, 2020 WL 6483971, at *1 (Nev. Nov. 3, 2020). This is simply not what the Plaintiffs request.

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///

1 During and following the 2020 Election, numerous individuals attempting to observe
2 the process were prevented from doing so in any meaningful way. By way of example, the
3 following scenarios occurred in Clark County:

- 4 a. Observers were placed in locations where the view of the ballot
5 processing was obscured;
- 6 b. In almost all instances, the observers were placed too far away from the
7 ballot processing to be able to discern what was actually taking place;
- 8 c. Aspects of the ballot processing took place in closed rooms and locations
9 where observers were not allowed access;
- 10 d. Boxes of ballots were moved between various locations without the
11 observers having any opportunity to review the ballots or understand what
12 stage in the counting process the ballots were in;
- 13 e. In the minimal times where observers were theoretically in close enough
14 proximity to observe, they were not afforded ample time to actually
15 observe the process in any meaningful way;
- 16 f. There was an insufficient number of ambassadors that were required to
17 accompany observers to enable more than a few individuals to
18 meaningfully observe the ballot processing;
- 19 g. Observers were told information that conflicted with what they were
20 seeing during the ballot processing; and
- 21 h. While observers could see that there were mechanical and/or program
22 issues and errors with various pieces of technology in the ballot
23 processing, they were unable to view any screens or understand the actual
24 nature of the issues and errors, which rendered the observation
25 meaningless.

26 PLAN does not dispute any of the aforementioned instances, not a single one. PLAN
27 asserts that, “none of those requirements appear anywhere in Nevada law, none are remotely
28 necessary for any legitimate purpose...” *See* Motion at 5:16-18. PLAN wholly fails to
acknowledge that Plaintiffs and the general public are statutorily entitled to observe the
ballot-counting activities pursuant to NRS §§ 293B.330, 335, and 353.

1 NRS 293.2546(10) states that each voter has the right “to have a uniform, statewide
2 standard for counting and recounting all votes accurately.” If PLAN’s interpretation of NRS
3 §§ 293B.330, 335, and 353 differs from Plaintiffs, PLAN fails to identify its interpretation
4 of voter observation. PLAN does not identify a single one of its members who seek to observe
5 Nevada elections. PLAN is not a voter in Nevada. Plaintiffs’ relief sought would not target
6 PLAN’s statutory right as alleged in the Motion. While members of PLAN can observe
7 elections, PLAN itself cannot. A non-profit organization itself does not have a right to
8 observe elections. Individuals have not sought intervention. There is no organizational right
9 to observe elections in Nevada. If PLAN were permitted to intervene, any organization could
10 seek intervention based on PLAN’s rationale.
11

12 PLAN has no claims nor defenses in this matter. Seeking to intervene for the sake of
13 intervening does not meet the standard outlined in further detail below. Additionally, PLAN
14 does not have standing to intervene as a Defendant as Plaintiffs do not seek relief from
15 PLAN, only Defendants. PLAN fails to identify one specific example of how Plaintiffs’
16 sought voter observation would impede or be disruptive to the voting process and Defendants
17 Cegavske and Gloria are the proper Defendants in this matter and PLAN’s sought
18 intervention is wholly improper and must be denied.
19

20 **II. LEGAL STANDARD**

21 Pursuant to NRS § 12.130, any person “[b]efore the trial, [...] may intervene in an
22 action or proceeding, who has an interest in the matter in litigation, in the success of either
23 of the parties, or an interest against both.” NRS 12.130(1)(a). “Intervention is made as
24 provided by the Nevada Rules of Civil Procedure.” NRS 12.130(c). In furtherance, NRCP
25 24(a)(2) governs non-statutory intervention of right and states that upon timely intervention
26 “the court must permit anyone to intervene who ... claims an interest relating to the property
27 or transaction that is the subject of the action, and is so situated that disposing of the action
28

1 may as a practical matter impair or impede the movant’s ability to protect its interest, unless
2 existing parties adequately represent that interest.” NRC P 24(a)(2). NRC P 24(b)(1)(B)
3 governs permissive intervention and allows for intervention when an applicant “has a claim
4 or defense that shares with the main action a common question of law or fact.” NRC P
5 24(b)(1)(B). As outlined in further detail below, PLAN has no significant nor legal interest
6 in the present matter and the proper Defendants in this matter are Defendants Cegavske and
7 Gloria.

9 III. LEGAL ARGUMENT

10 A. PLAN Lacks Standing to Intervene as a Defendant

11 The question of standing concerns whether the party seeking relief has a sufficient
12 interest in the litigation. *See Szilagyi v. Testa*, 99 Nev. 834, 838, 673 P.2d 495, 498 (1983)
13 (citing *Harman v. City & Cty. of San Francisco*, 7 Cal.3d 150, 101 Cal.Rptr. 880, 496 P.2d
14 1248, 1254 (1972) (“The fundamental aspect of standing is that it focuses on the party
15 seeking to get his complaint before a ... court.”)). The primary purpose of this standing
16 inquiry is to ensure the litigant will vigorously and effectively present his or her case against
17 an adverse party. *See Harman*, 101 Cal.Rptr. 880, 496 P.2d at 1254.

19 Generally, a party must show a personal injury and not merely a general interest that
20 is common to all members of the public. *See, e.g., Doe v. Bryan*, 102 Nev. 523, 525–26, 728
21 P.2d 443, 444–45 (1986) (requiring plaintiffs, who sought to have criminal statute declared
22 unconstitutional, to first demonstrate a personal injury, i.e., that they were arrested or
23 threatened with prosecution under the statute); *Blanding v. City of Las Vegas*, 52 Nev. 52,
24 69, 280 P. 644, 648 (1929) (requiring property owner to show that he would suffer a special
25 or peculiar injury different from that sustained by the general public in order to maintain
26 complaint for injunctive relief).
27
28

1 PLAN does not have a sufficient interest in this litigation. Plaintiffs do not seek relief
2 from PLAN, only Defendants. Additionally, PLAN lacks the statutory authority to
3 implement and enforce voter observation in Clark County elections, only Defendants can.
4 Given the recent appearances by Defendants in opposing Plaintiffs' Motion for a Temporary
5 Restraining Order, surely Defendants can adequately defend Plaintiffs claims.
6

7 A party must show injury to have standing and not merely a general interest that is
8 common to all members of the public. That is exactly what PLAN seeks, to intervene as a
9 Defendant with a general interest to observe elections and hinder Plaintiffs ability to do so.
10 Notably, PLAN itself cannot even observe elections. No individual has sought intervention.
11 Additionally, PLAN has no defenses to Plaintiffs claims, as Defendants implement and
12 enforce voter observation, or lack thereof. As such, without any claims or defenses, PLAN
13 lacks standing to intervene in this matter.
14

15 **B. PLAN Should Not be Permitted to Intervene as a Matter of Right**

16 The Supreme Court of Nevada has imposed four requirements on an application
17 seeking to intervene in an action: (1) the application must be timely; (2) the applicant must
18 claim a sufficient interest relating to the property or transaction which is the subject of the
19 action; (3) the applicant must be so situated that the disposition of the action may as a
20 practical matter impair or impede its ability to protect that interest; and (4) the applicant's
21 interest must be inadequately represented by the parties to the action. *See American Home*
22 *Assurance Corp. v. Eighth Judicial District Ct. ex rel. County of Clark*, 122 Nev. 1229, 1238,
23 147 P.3d 1120, 1126 (2006).¹ Determining whether an applicant has met these four
24

25 _____
26 ¹ Federal decisions involving the federal civil procedure rules are persuasive authority when
27 this court examines its equivalent rules. *See Executive Mgmt. v. Ticor Title Ins. Co.*, 118 Nev.
28 46, 53, 38 P.3d 872, 876 (2002). The 2019 amendment specifically conform NRCP 24 to its
Federal counterpart, FRCP 24. *See Nev. R. Civ. P. 24* (advisory committee note on the 2019
amendment).

1 requirements is within the district court’s sound discretion. *Am. Home Assur. Co.*, 122 Nev.
2 at 1126.

3 However, when evaluating whether the requirements for intervention of right are met,
4 a court generally follows practical and equitable considerations and construes the governing
5 rule broadly in favor of proposed intervenors. *Wilderness Soc’y v. U.S. Forest Service*, 630
6 F.3d 1173, 1179 (9th Cir. 2011) (*en banc*) (*quoting United States v. City of Los Angeles*, 288
7 F.3d 391, 397 (9th Cir. 2002)). This is because “[a] liberal policy in favor of intervention
8 serves both efficient resolution of issues and broadened access to the Courts.” *Wilderness*
9 *Soc’y*, 630 F.3d 1173 (*quoting City of Los Angeles*, 288 F.3d at 397-98). As outlined in
10 further detail below, PLAN cannot meet any of the four elements to seek intervention and its
11 Motion must be denied.
12

13 **1. PLANS’ Motion to Intervene is Untimely Given the Upcoming Primary**
14 **Election and Early Voting Starting on May 28, 2022**

15 The Supreme Court of Nevada has held that when determining the timeliness of an
16 application to intervene “[t]he most important question to be resolved [...] is not the length
17 of the delay by the intervenor but the extent of prejudice to the rights of existing parties
18 resulting from the delay.” *See Dangberg Holdings Nevada, L.L.C. v. Douglas Cty. & its Bd.*
19 *of Cty. Commr’s*, 115 Nev. 129, 141, 978 P.2d 311, 318 (1999); *see also American Home*
20 *Assurance Corp.*, 122 Nev. at 1244, n.49 and n.50 (citations omitted).
21

22 While this matter was filed on April 14, 2022, early voting for the Primary Election
23 begins on May 28, 2022. While PLAN, “intends to continue its observation activities”², it
24 fails to identify what it defines as observation activities and what observations activities
25 requests by Plaintiffs exceed their statutory right. Oddly, while claiming that Plaintiffs’
26
27

28

²See Motion at 6:5-6.

1 request will disrupt PLAN’s voter observation, PLAN wholly seeks to halt meaningful voter
2 observation during the Primary Election for Plaintiffs. Simply seeking intervention with no
3 actual dispute as to what Plaintiffs’ are requesting in their Second Amended Complaint
4 demonstrates that PLAN’s request is untimely, as it merely seeks to enforce a gridlock,
5 wherein Plaintiffs will not be able to meaningfully observe the Primary Election.
6

7 **2. PLAN Does Not Have a Sufficient Interest in the Litigation’s Subject Matter**

8 While there is no “bright-line” test to determine if a sufficient interest exists, the
9 Supreme Court of Nevada has held that an applicant must make a showing of a “significant
10 protectable interest.” *See Am. Home Assur. Co.*, 122 Nev. 1229, 1238, 147 P.3d 1120, 1127
11 (2006). Whether a proposed intervenor has a significant protectable interest is a “practical,
12 threshold inquiry,” and the party seeking intervention need not establish any “specific legal
13 or equitable interest.” *Citizens for Balanced Use v. Montana Wilderness Ass’n*, 647 F.3d 893,
14 897 (9th Cir. 2011) (internal quotations omitted) (quoting *Nw. Forest Res. Council v.*
15 *Glickman*, 82 F.3d 825, 837 (9th Cir. 1996)).
16

17 To meet its burden, a proposed intervenor “must establish that the interest is
18 protectable under some law and that there is a relationship between the legally protected
19 interest and the claims at issue.” *Id.* The question of whether there is a significant protectable
20 interest does not turn on “technical distinctions.” *California v. United States*, 450 F.3d 436,
21 441 (9th Cir. 2006). Instead, courts “have taken the view that a party has a sufficient interest
22 for intervention purposes if it will suffer a practical impairment of its interests as a result of
23 the pending litigation.” *See id.*
24

25 Plaintiffs do not dispute that each voter has the right “to have a uniform, statewide
26 standard for counting and recounting all votes accurately.” *See NRS 293.2546(10)*. PLAN,
27 as a non-profit organization, has no statutory right to voter or observe Clark County elections.
28

1 PLAN lacks any significant protectable interest to intervene in this matter. While Plaintiffs
2 acknowledge PLAN's asserted goals as a non-profit organization, there is not a single actual
3 legally protected interest identified in the Motion. Broad assertions that PLAN, "cannot rely
4 on the parties in this case to adequately represent its interests"³ is insufficient to demonstrate
5 any actual interest in the case. Additionally, given Defendants recent appearance and
6 Opposition to Plaintiffs Motion for a Temporary Restraining Order, surely Defendants can
7 represent PLANS interests. Plaintiffs do not dispute Defendants authority to implement
8 election procedures and execute them, they merely seek to enforce a statutory right. A right
9 PLAN seeks to enforce, but it somehow different than Plaintiffs despite PLAN failing to
10 dispute any named Plaintiffs or assert that they would in any way impact any other voter's
11 ability to vote. Without any significant interest, the Motion must be denied.
12

13
14 **3. The Disposition of This Action Will Not Impair or Impede PLAN's Ability**
15 **to Protect Their Interests**

16 Once a significant protectable interest is established, courts look to whether the
17 proposed intervenor's ability to protect that interest would be "impair[ed] or impede[ed]" by
18 "the disposition of the action." *Citizens for Balanced Use*, 647 F.3d at 897 (citation omitted).
19 "If an absentee would be substantially affected in a practical sense by the determination made
20 in an action, [it] should, as a general rule, be entitled to intervene...." *Id.* at 898 (quoting Fed
21 R. Civ. P. 24 advisory committee's note).
22

23 PLAN seeks to both enforce statutory rights and simultaneously assert that
24 Defendants cannot properly represent Nevada voters' interests. Plaintiffs' have not sought
25 to, "manufacture a dispute in the hope of undermining the application process"⁴, they have
26

27
28 ³See Motion at 8:3-5.

⁴ *Id.* at 9:21-22.

1 identified eight (8) representative voter observation issues during the 2020 Election. PLAN
2 fails to dispute any of the shortcomings of the 2020 Election whatsoever as asserted by
3 Plaintiffs. Plaintiffs request seeks uniform observation and ballot counting, Defendants can
4 properly represent PLAN’s interests as Defendants are the parties to implement and conduct
5 Clark County elections. Importantly, PLAN has no claims or defenses in this matter. Even if
6 any member of PLAN sought to meaningfully observe Nevada elections, the disposition of
7 this case would not limit what observation can take place if Plaintiffs prevail.
8

9 **4. PLAN’s Interests, if Any, Will be Adequately Represented by Defendants**

10 Generally, “[t]he burden of showing inadequacy of representation is minimal and
11 satisfied if the [party seeking intervention] can demonstrate that representation of its interests
12 may be inadequate.” *Citizens for Balanced Use*, 647 F.3d at 898 (internal quotation omitted);
13 *see also Trbovich v. United Mine Workers*, 404 U.S. 528, 538 n. 10, 92 S.Ct. 630, 636 n. 10,
14 30 L.Ed.2d 686 (1972) (holding that the requirement of inadequate representation is satisfied
15 if the applicant shows that representation “may be” inadequate). In making this
16 determination, courts examine three factors: (1) whether the interest of a present party is such
17 that it will undoubtedly make all of a proposed intervenor’s arguments; (2) whether the
18 present party is capable and willing to make such arguments; and (3) whether a proposed
19 intervenor would offer any necessary elements to the proceeding that other parties would
20 neglect. *Citizens for Balanced Use*, 647 F.3d at 898 (quoting *Arakaki v. Cayetano*, 324 F.3d
21 1078, 1086 (9th Cir. 2003)).
22
23

24 “The most important factor in assessing the adequacy of representation is how the
25 interest compares with the interests of existing parties.” *Citizens for Balanced Use*, 647 F.3d
26 at 898 (internal quotation and citation omitted). Where a proposed intervenor and an existing
27 party “share the same ultimate objective, a presumption of adequacy of representation
28

1 arises.” *Citizens for Balanced Use*, 647 F.3d at 898 (citation omitted). A presumption of
2 adequacy “must be rebutted with a compelling showing.” *Id.* (citation omitted).

3 PLAN’s interests will be adequately represented by Defendants. It is clear that
4 Defense counsel, the Attorney General’s office, is more than capable of defending this action.
5 This is evidenced by the Defendants recent Opposition to the Motion for Temporary
6 Restraining Order. Counsel for Defendants, Craig Newby, has years of experience and is a
7 more than capable attorney to represent the Defendants and the Defendants’ interests. PLAN
8 specifically fails to identify a single specific reason as to why Defendants will not properly
9 represent their interests, PLAN does not dispute how Defendants conducted the 2020
10 Election.
11

12 Defendants can assert any argument that PLAN has asserted, specifically assertions
13 that the voter observation sought is beyond the statutory scope. Seeking to intervene to
14 intervene is not enough and the Motion should be denied in its entirety. It is important to
15 note that the Intervenor has the burden of proof to meet all four elements in order to be
16 allowed into the case. Clearly, PLAN fails to demonstrate a single reason why the
17 Defendants cannot represent their interests. As such, this element alone necessitates denial
18 of the motion.
19

20 **C. PLAN Also Fails to Satisfy NRCP 24(b) Requirements for Permissive**
21 **Intervention**
22

23 Permissive intervention is available when the motion is timely and “the applicant’s
24 claim or defense, and the main action, have a question of law or a question of fact in
25 common.” NRCP 24(b)(1)(B). “In exercising its discretion” on this issue, “the court must
26 consider whether the intervention will unduly delay or prejudice the adjudication of the
27 original parties’ rights.” NRCP 24(b)(3).
28

1 Although PLAN cannot establish intervention as right, PLAN should not be granted
2 permissive intervention under NRCP 24(b). PLAN has not and cannot assert a claim or
3 defense that relate to the main action. Moreover, allowing PLAN to intervene in this suit
4 will unduly delay and prejudice the adjudication of the current parties' rights, specifically
5 Plaintiffs rights to meaningfully observe the Primary Election. Intervention will not promote
6 judicial economy nor spare the parties from needing to litigate a similar case in another
7 district. *See Dangberg Holdings Nevada, L.L.C.*, 115 Nev. 129, 142, 978 P.2d 311, 319
8 (1999) (where the court found “bringing all of the parties together in one proceeding before
9 one tribunal will foster the principles of judicial economy and finality”); *see also Venegas v.*
10 *Skaggs*, 867 F.2d 527, 531 (9th Cir. 1989) (noting that “judicial economy is a relevant
11 consideration in deciding a motion for permissive intervention”), *aff'd sub nom. Venegas v.*
12 *Mitchell*, 495 U.S. 82, 87, 110 S.Ct. 1679, 109 L.Ed.2d 74 (1990). Accordingly, this Court
13 should deny PLAN’s Motion to Intervene in its entirety.
14
15

16 **IV. CONCLUSION**

17 Based on the foregoing, the Proposed Intervenor’s Motion should be denied in its
18 entirety.

19 DATED: May 9th, 2022

JENNINGS & FULTON, LTD.

20 By: /s/ Adam R. Fulton, Esq.

21 ADAM R. FULTON, ESQ.

22 Nevada Bar No. 11572

23 afulton@jfnvlaw.com

24 LOGAN G. WILLSON, ESQ.

25 Nevada Bar No. 14967

26 logan@jfnvlaw.com

27 2580 Sorrel Street

28 Las Vegas, Nevada 89146

Telephone: (702) 979-3565

Facsimile: (702) 362-2060

Attorneys for Plaintiffs

1 **CERTIFICATE OF SERVICE**

2 Pursuant to N.R.C.P. 5(b), I hereby certify that I am an employee of JENNINGS &
3 FULTON, LTD., and that on the 9th day of May, 2022, I caused a true and correct copy of
4 the foregoing **PLAINTIFFS’ OPPOSITION TO MOTION TO INTERVENE AS**
5 **DEFENDANT** to be served via personal service as follows:
6

7 AARON D. FORD
8 Attorney General
9 CRAIG A. NEWBY (Bar No. 8591)
10 Deputy Solicitor General
11 LAENA ST-JULES (Bar No. 15156)
12 Deputy Attorney
13 General Office of the Attorney General
14 555 E. Washington Ave., Ste. 3900
15 Las Vegas, NV 89101
16 (702) 486-3594
17 CNewby@ag.nv.gov
18 LStJules@ag.nv.gov
19 *Attorneys for Defendant Barbara Cegavske*

20 STEVEN B. WOLFSON
21 District Attorney
22 CIVIL DIVISION
23 State Bar No. 001565
24 By: LISA V. LOGSDON
25 County Counsel
26 State Bar No. 011409
27 500 South Grand Central Pkwy.
28 Las Vegas, Nevada 89155-2215
(702) 455-4761
Fax (702) 382-5178
E-Mail: Lisa.Logsdon@ClarkCountyDA.com
Attorneys for Defendant Joseph P. Gloria

UZOMA NKWONTA (D.C. Bar. No. 975323) (pro hac vice forthcoming)
DAVID R. FOX (D.C. Bar No. 1015031) (pro hac vice forthcoming)
MAYA SEQUEIRA ((D.C. Bar No. 1029352) (pro hac vice forthcoming)
MELINDA K. JOHNSON (D.C. Bar No. 1620229) (pro hac vice forthcoming)
ELIAS LAW GROUP LLP
10 G Street NE, Suite 600
Washington, D.C. 20002
Tel: (202) 968-4490
unkwonta@elias.law
dfox@elias.law

JENNINGS & FULTON, LTD.
2580 SORREL STREET
LAS VEGAS, NEVADA 89146
TELEPHONE 702 979 3565 ♦ FAX 702 362 2060

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26
27
28

msequeira@elias.law
mjohnson@elias.law
BRADLEY SCHRAGER (SBN 10217)
DANIEL BRAVO (SBN 13078)
**WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP**
3773 Howard Hughes Parkway, Suite 590 South
Las Vegas, Nevada 89169
Tel: (702) 341-5200
bschrager@wrslawyers.com
*Attorneys for Proposed Intervenor-
Defendant Progressive Leadership
Alliance of Nevada*

/s/ Misty Janati
An Employee of JENNINGS & FULTON, LTD.

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