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| 1 | UZOMA NKWONTA (D.C. Bar No. 975323) (pro hac vice forthcoming)       |
|---|--|
|   | DAVID R. FOX (D.C. Bar No. 1015031) (pro hac vice forthcoming)       |
| 2 | MAYA SEQUEIRA (D.C. Bar No. 1029352) (pro hac vice forthcoming)      |
|   | MELINDA K. JOHNSON (D.C. Bar No. 1620229) (pro hac vice forthcoming) |
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| Attorneys for Proposed Intervenor-Defendant | Progressive Leadership Alliance of Nevada

# EIGHTH JUDICIAL DISTRICT COURT IN AND FOR CLARK COUNTY, STATE OF NEVADA

16 | SCOTT GOLDMAN, an individual; ALENA 17 | SHEEHAN, an individual; GREGG SEYMOUR,

an individual; KIMBERLY FERGUS, an individual; PATTY JANE (PJ) BELANGER, an individual; EMILEANNE ENCE, an individual;

MARIE ARNOLD, an individual; PAM NORMAN, an individual; CRISTINA VON

20 | LINDENBERG, an individual; GREGORY RANDLES, an individual; ALAN RYAN

21 VINCENT, an individual; CYRUS HOJJATY, an individual; BRIDGET HOLDAR, an

22 individual; HEATHER FLORIAN, an individual; TIMOTHY WAGNER, an

23 individual; DESIREE DESTEFANO, an individual; MARTIN WALDMAN, an

24 individual; VEM MILLER, an individual; DANIELLE KEAR, an individual; DOUGLAS

25 RANDLES, an individual; SUSAN PROFFITT, an individual; KRISTENE HONZIK, an

26 | individual; JENNIFER ROWE, an individual; PAMELA BENNETTS, an individual; ROBERT

27 MOORHEAD, JR., an individual; MARIA THERESA F. DIAZ, an individual;

28 | ALEXANDREA SLACK, an individual;

Case No. A-22-851189-C

Dept. No.: 17

ORDER GRANTING PROGRESSIVE LEADERSHIP ALLIANCE OF NEVADA'S MOTION TO INTERVENE

ORDER GRANTING PROGRESSIVE LEADERSHIP ALLIANCE OF NEVADA'S MOTION TO INTERVENE

JONATHAN MAXHAM, an individual, MARGARET WHITE, an individual; PERANUT SAE-ANG, an individual; CAROLYN VANZLOW, an individual; BRIAN 3 COULTER, an individual; HEIDI CLINGEN, an individual: Plaintiff, 4 5 v. BARBARA CEGAVSKE, in her official capacity as Nevada Secretary of State; JOSEPH P. GLORIA, in his official capacity as Registrar of Voters for Clark County, Nevada; DOES I-X, inclusive; and ROE CORPORATIONS I-X, inclusive, 9 Defendants. 10 and 11 PROGRESSIVE LEADERSHIP ALLIANCE OF NEVADA. 12 Intervenor-13 Defendant. 14 15 Before the Court is Proposed-Intervenor Progressive Leadership Alliance of Nevada's 16 ("PLAN") Motion to Intervene The Court held a hearing on PLAN's Motion to Intervene on 17 May 10, 2022 on shortened time. Counsel for all parties were present. The Court considered all of 18 the papers filed by the parties and PLAN and the files and records in this matter, and good cause 19 appearing, 20 The Court finds that intervention as of right is warranted under Nevada Rule of Civil 21 Procedure 24(a). The motion to intervene was timely, having been filed before any substantive 22 activity in the case. Additionally and alternatively, the Court further finds that permissive 23 intervention is warranted under Nevada Rule of Civil Procedure 24(b). PLAN's participation will 24 cause no delay in proceedings or otherwise be prejudicial. Intervention is therefore appropriate. 25 /// 26 27 28

| 1  | THEREFORE, good car   | use appearing, Progress  | sive Leadership Alliance of Nevada's      |  |  |
|----|---|--------------------------|---|--|--|
| 2  | Motion to Intervene is <b>GRANTE</b>  | ), and Progressive Leade | rship Alliance of Nevada is accorded full |  |  |
| 3  | rights of a party as Intervenor-Def   | endant.                  | Dated this 11th day of May, 2022          |  |  |
| 4  |   |                          | Man 1V                                    |  |  |
| 5  |   | District Court Judge     | 1/  |  |  |
| 6  | 0.1 % 11  | For Judge Bixler         | 35B 7B5 418C 4357                         |  |  |
| 7  | Submitted by:   |                          | Michael Villani<br>District Court Judge   |  |  |
| 8  | /s/ Bradley S. Schrager   | N. 075222) ( 1 :         |   |  |  |
| 9  | UZOMA NKWONTA (D.C. Bar I<br>DAVID R. FOX (D.C. Bar No. 10  | 15031) (pro hac vice for | thcoming)                                 |  |  |
| 10 | MAYA SEQUEIRA (D.C. Bar No<br>MELINDA K. JOHNSON (D.C. I  |                          |   |  |  |
| 11 | ELIAS LAW GROUP LLP<br>10 G Street NE, Suite 600  | χ.                       | COM                                       |  |  |
| 12 | Washington, D.C. 20002  | CKE                      |   |  |  |
| 13 | 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 |                          |   |  |  |
| 14 |   |                          |   |  |  |
|    |   |                          |   |  |  |
| 15 |   |                          |   |  |  |
| 16 | Attorneys for Intervenor-Defendant Progressive Leadership Alliance of Nevada  |                          |   |  |  |
| 17 | Approved as to Form & Content:  |                          |   |  |  |
| 18 | JENNINGS & FULTON, LTD.   |                          |   |  |  |
| 19 |   |                          |   |  |  |
| 20 | /s/ Logan G. Wilson Adam R. Fulton, Esq.  |                          |   |  |  |
| 21 | Nevada Bar No. 11572<br>afulton@jfnvlaw.com   |                          |   |  |  |
| 22 | Logan G. Willson, Esq.<br>Nevada Bar No. 14967  |                          |   |  |  |
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| 25 | Telephone: (702) 979-3565<br>Facsimile: (702) 362-2060  |                          |   |  |  |
| 26 | Attorneys for Plaintiffs  |                          |   |  |  |
| 27 |   |                          |   |  |  |
| 28 | /   |                          |   |  |  |
| 20 | / / /   |                          |   |  |  |

| 1        | / <u>s/ Lisa Logsaon</u>   |
|----------|--|
| 2        | Steven B. Wolfson, District Attorney   |
| 2        | Lisa V. Logsdon, County Counsel 500 South Grand Central Pkwy. 5th Flr.           |
| 3        | Las Vegas, Nevada 89155  |
| 4        | Attorneys for Defendant Joseph P. Gloria   |
| 5        |  |
| 6        |  |
| 7        | Aaron D. Ford, Attorney General  |
| 8        | Craig A. Newby, Deputy Solicitor General Laena St-Jules, Deputy Attorney General |
| 9        | Office of the Attorney General 555 E. Washington Ave., Ste. 3900                 |
| 10       | Las Vegas, Nevada 89101  |
| 11       | Attorneys for Defendant Barbara Cegavske   |
| 12       | 100ct  |
| 13       | C.R.A.C.T.   |
| 14       | OEMOC .  |
| 15       | ROWL   |
| 16       | WED F.   |
| 17<br>18 | Las Vegas, Nevada 89101  Attorneys for Defendant Barbara Cegavske                |
| 19       |  |
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|          | 4  |
|          | ORDER GRANTING PROGRESSIVE LEADERSHIP ALLIANCE OF NEVADA'S MOTION TO INTERVENE   |

From: Daniel Bravo

**Sent:** Wednesday, May 11, 2022 2:34 PM

**To:** Dannielle Fresquez

**Subject:** FW: Goldman et al v. Cegavske et al (A-22-851189-C) / Order Granting Intervention

From: Lisa Logsdon < Lisa.Logsdon@clarkcountyda.com>

**Sent:** Wednesday, May 11, 2022 2:31 PM **To:** Daniel Bravo <DBravo@wrslawyers.com>

Subject: RE: Goldman et al v. Cegavske et al (A-22-851189-C) / Order Granting Intervention

#### **CAUTION: EXTERNAL EMAIL**

Yes, you may. Thank you.

Lisa Logsdon County Counsel

Clark County District Attorney – Civil Division

Telephone: (702) 455-4761

Email: Lisa.Logsdon@ClarkCountyDA.com

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From: Daniel Bravo < DBravo@wrslawyers.com><

Sent: Wednesday, May 11, 2022 2:24 PM

To: Lisa Logsdon < Lisa.Logsdon@clarkcountyda.com>

Subject: Fwd: Goldman et al v. Cegavske et al (A-22-851189-C) / Order Granting Intervention

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Is the order okay with you? Can we use your electronic signature?

Begin forwarded message:

From: "Craig A. Newby" < <a href="mailto:CNewby@ag.nv.gov">CNewby@ag.nv.gov</a>>

Date: May 11, 2022 at 2:07:17 PM PDT

**To:** Logan Willson < <a href="mailtonbar-105"><u>logan@jfnvlaw.com</u></a>, Daniel Bravo < <a href="mailton@jfnvlaw.com"><u>DBravo@wrslawyers.com</u></a>, Adam Fulton < <a href="mailton@jfnvlaw.com"><u>afulton@jfnvlaw.com</u></a>, "Lucas J. Combs" < <a href="mailton@jfnvlaw.com"><u>ljcombs@ag.nv.gov</u></a>, <a href="mailtongafeni.banks@clarkcountyda.com"><u>afeni.banks@clarkcountyda.com</u></a>,

Lisa.Logsdon@clarkcountyda.com

Cc: Bradley Schrager < bschrager@wrslawyers.com >, Dannielle Fresquez < DFresquez@wrslawyers.com >,

Maya Sequeira <msequeira@elias.law>, Mindy Johnson <mjohnson@elias.law>, David Fox

<dfox@elias.law>, Laena St Jules <LStJules@ag.nv.gov>

Subject: Re: Goldman et al v. Cegavske et al (A-22-851189-C) / Order Granting Intervention

### **CAUTION: EXTERNAL EMAIL**

I am fine with it and my e-signature can be added.

From: Logan Willson < logan@jfnvlaw.com>
Sent: Wednesday, May 11, 2022 9:03 AM

**To:** Daniel Bravo < <u>DBravo@wrslawyers.com</u>>; Craig A. Newby < <u>CNewby@ag.nv.gov</u>>; Adam Fulton < <u>afulton@jfnvlaw.com</u>>; Lucas J. Combs < <u>ljcombs@ag.nv.gov</u>>; 'afeni.banks@ClarkCountyDA.com' < <u>afeni.banks@ClarkCountyDA.com</u>>; <u>Lisa.Logsdon@clarkcountyda.com</u>

<<u>Lisa.Logsdon@clarkcountyda.com</u>>

**Cc:** Bradley Schrager < <u>BSchrager@wrslawyers.com</u>>; Dannielle Fresquez < <u>DFresquez@wrslawyers.com</u>>; Maya Sequeira < <u>msequeira@elias.law</u>>; Mindy Johnson < <u>mjohnson@elias.law</u>>; David Fox < dfox@elias.law>; Laena St Jules < LStJules@ag.nv.gov>

Subject: RE: Goldman et al v. Cegavske et al (A-22-851189-C) / Order Granting Intervention

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Daniel,

You can include my e-signature.

From: Daniel Bravo < DBravo@wrslawyers.com>
Sent: Wednesday, May 11, 2022 8:55 AM

**To:** Logan Willson < logan@jfnvlaw.com>; Craig A. Newby < CNewby@ag.nv.gov>; Adam Fulton < afulton@jfnvlaw.com>; Lucas J. Combs < ljcombs@ag.nv.gov>; 'afeni.banks@ClarkCountyDA.com' < afeni.banks@ClarkCountyDA.com>; Lisa.Logsdon@clarkcountyda.com

**Cc:** Bradley Schrager < <u>BSchrager@wrslawyers.com</u>>; Dannielle Fresquez < <u>DFresquez@wrslawyers.com</u>>; Maya Sequeira < <u>msequeira@elias.law</u>>; Mindy Johnson < <u>mjohnson@elias.law</u>>; David Fox < <u>dfox@elias.law</u>>; Laena St Jules < <u>LStJules@ag.nv.gov</u>>

Subject: RE: Goldman et al v. Cegavske et al (A-22-851189-C) / Order Granting Intervention

Redlines accepted, and signature blocks added. Please let us know if there are any changes to the signature blocks, or whether we may add your electronic signature and submit.

Daniel Bravo, Esq.

Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP 3773 Howard Hughes Parkway, Suite 590 South

Las Vegas, Nevada 89169 PH: (702) 341-5200, Ext. 5113

FX: (702) 341-5300

E-Mail: dbravo@wrslawyers.com

www.wrslawyers.com

From: Logan Willson < logan@jfnvlaw.com>
Sent: Tuesday, May 10, 2022 4:15 PM

**To:** Craig A. Newby < CNewby@ag.nv.gov >; Daniel Bravo < DBravo@wrslawyers.com >; Adam Fulton < afulton@jfnvlaw.com >; Lucas J. Combs < ljcombs@ag.nv.gov >; 'afeni.banks@ClarkCountyDA.com' < afeni.banks@ClarkCountyDA.com >; Lisa.Logsdon@clarkcountyda.com

**Cc:** Bradley Schrager < <u>BSchrager@wrslawyers.com</u>>; Dannielle Fresquez < <u>DFresquez@wrslawyers.com</u>>; Maya Sequeira < <u>msequeira@elias.law</u>>; Mindy Johnson < <u>mjohnson@elias.law</u>>; David Fox < <u>dfox@elias.law</u>>; Laena St Jules < <u>LStJules@ag.nv.gov</u>>

Subject: RE: Goldman et al v. Cegavske et al (A-22-851189-C) / Order Granting Intervention

## **CAUTION: EXTERNAL EMAIL**

All,

See attached revisions to the proposed order. We'll need signature blocks for Defendants as well. Let me know if you have any questions.

From: Craig A. Newby <CNewby@ag.nv.gov>

Sent: Tuesday, May 10, 2022 2:18 PM

**To:** Daniel Bravo < <u>DBravo@wrslawyers.com</u>>; Adam Fulton < <u>afulton@jfnvlaw.com</u>>; Logan Willson < <u>logan@jfnvlaw.com</u>>; Lucas J. Combs < <u>ljcombs@ag.nv.gov</u>>; 'afeni.banks@ClarkCountyDA.com' < <u>afeni.banks@ClarkCountyDA.com</u>>; <u>Lisa.Logsdon@clarkcountyda.com</u>>

**Cc:** Bradley Schrager < <u>BSchrager@wrslawyers.com</u>>; Dannielle Fresquez < <u>DFresquez@wrslawyers.com</u>>; Maya Sequeira < <u>msequeira@elias.law</u>>; Mindy Johnson < <u>mjohnson@elias.law</u>>; David Fox < <u>dfox@elias.law</u>>; Laena St Jules < <u>LStJules@ag.nv.gov</u>>

Subject: RE: Goldman et al v. Cegavske et al (A-22-851189-C) / Order Granting Intervention

Hello Daniel:

The Secretary has no opposition to the proposed order.

Thank you,

Craig

From: Daniel Bravo < DBravo@wrslawyers.com>

**Sent:** Tuesday, May 10, 2022 1:06 PM

To: afulton@jfnvlaw.com; logan@jfnvlaw.com; Lucas J. Combs <ljcombs@ag.nv.gov>;

'afeni.banks@ClarkCountyDA.com' <a href="mailto:afeni.banks@ClarkCountyDA.com">; Lisa.Logsdon@clarkcountyda.com; Craig A. Newby <CNewby@ag.nv.gov>

**Cc:** Bradley Schrager < <a href="mailto:BSchrager@wrslawyers.com">BSchrager@wrslawyers.com</a>; Dannielle Fresquez < <a href="mailto:DFresquez@wrslawyers.com">DFresquez@wrslawyers.com</a>; Dannielle Fresquez < <a href="mailto:DFresquez@wrslawyers.com">DFresquez@wrslawyers.com</a>;

 $\label{lem:maya} \mbox{Maya Sequeira} $$ \leq \underline{\mbox{msequeira@elias.law}}$; \mbox{Mindy Johnson} $<\underline{\mbox{mjohnson@elias.law}}$; \mbox{David Fox} $$$ 

<dfox@elias.law>; Laena St Jules <LStJules@ag.nv.gov>

Subject: Goldman et al v. Cegavske et al (A-22-851189-C) / Order Granting Intervention

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## Counsel:

Please see the attached draft order granting PLAN's motion to intervene. Let us know if you have any proposed edits; we'll submit to Chambers by COB tomorrow.

Daniel Bravo, Esq. Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP 3773 Howard Hughes Parkway, Suite 590 South Las Vegas, Nevada 89169

PH: (702) 341-5200, Ext. 5113

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1 **CSERV** 2 DISTRICT COURT 3 CLARK COUNTY, NEVADA 4 5 Scott Goldman, Plaintiff(s) CASE NO: A-22-851189-C 6 DEPT. NO. Department 17 VS. 7 8 Joseph Gloria, Defendant(s) 9 10 **AUTOMATED CERTIFICATE OF SERVICE** 11 This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order was served via the court's electronic eFile system to all 12 recipients registered for e-Service on the above entitled case as listed below: 13 Service Date: 5/11/2022 14 bschrager@wrslawyers.com Bradley Schrager 15 dfresquez@wrslawyers.com Dannielle Fresquez 16 Daniel Bravo dbravo@wrslawyers.com 17 18 Melissa Shield mshield@wrslawyers.com 19 Adam Fulton afulton@jfnvlaw.com 20 Norma Richter nrichter@jfnvlaw.com 21 Logan Willson Logan@jfnvlaw.com 22 Afagh Ghayour aghayour@jfnvlaw.com 23 Misty Janati misty@jfnvlaw.com 24 25 Eric Levinrad elevinrad@wrslawyers.com 26 Lisa Logsdon Lisa.Logsdon@clarkcountyda.com 27

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