

Clerk of the Court  
Transaction # 9061457

1 UZOMA NKWONTA (D.C. Bar No. 1015031) (pro hac vice forthcoming)  
DAVID R. FOX (D.C. Bar No. 1015031) (pro hac vice pending)  
2 MAYA SEQUEIRA (D.C. Bar No. 1029352) (pro hac vice forthcoming)  
MELINDA K. JOHNSON (D.C. Bar No. 1620229) (pro hac vice forthcoming)

3 **ELIAS LAW GROUP LLP**

10 G Street NE, Suite 600  
4 Washington, D.C. 20002  
Tel: (202) 968-4490  
5 unkwonta@elias.law.  
dfox@elias.law  
6 msequeira@elias.law  
mjohnson@elias.law

7 BRADLEY SCHRAGER (SBN 10217)  
8 DANIEL BRAVO (SBN 13078)  
**WOLF, RIFKIN, SHAPIRO,**  
9 **SCHULMAN & RABKIN, LLP**  
3773 Howard Hughes Parkway, Suite 590 South  
10 Las Vegas, Nevada 89169  
Tel: (702) 341-5200  
11 bschrager@wrslawyers.com  
dbravo@wrslawyers.com

12 *Attorneys for Proposed Intervenor-Defendant*  
13 *Progressive Leadership Alliance of Nevada*

14 **SECOND JUDICIAL DISTRICT COURT**  
15 **IN AND FOR THE COUNTY OF WASHOE**

16 ROBERT BEADLES, an individual;  
17 RICHARD H. LEE, an individual; JEFF  
LOFY, an individual; CAROLYN  
18 SULLIVAN, an individual; PAMELA JO  
SORENSEN, an individual; BETTY  
19 THIESSEN, an individual; MICHAEL KICH,  
an individual; DAVID CHAMBERLAIN, an  
20 individual; JILL RANSOM, an individual;  
LOUISA CRAVIOTTO, an individual;  
21 SIAVOSH SHAMSHIRPOURIAN, an  
individual; PENNY L. BROCK, an individual;  
22 JAMES M. BENTHIN, an individual;  
STACEY SAMPSON, an individual; LESTER  
23 K. COOPER, an individual; KEN  
KASTERKO, an individual; WAYNE  
24 CATES, an individual; J.S. MCELHINNEY,  
III, an individual; D.E. FERREL, an  
25 individual; SEAN GALLAGHER, an  
individual; GALIN BROOKS, an individual;  
26 THOMAS HUFFORD, an individual; DELIA  
WHITE, an individual; JASON RAND  
27 LOWE, an individual; RICHARD SANDOZ,  
an individual; VALERIE WHARTON, an

Case No. CV22-00661  
Dept. No.: 7

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

1 individual,  
2  
3 Plaintiffs,  
4  
5 v.  
6 BARBARA CEGAVSKE, in her official capacity as  
7 Nevada Secretary of State; DEANNA SPIKULA, in  
8 her official capacity as Registrar of Voters for  
9 Washoe County, Nevada; DOES I-X, inclusive; and  
10 ROE CORPORATIONS I-X, inclusive,  
11  
12 Defendants,  
13  
14 and  
15 PROGRESSIVE LEADERSHIP ALLIANCE  
16 OF NEVADA,  
17  
18 Intervenor-Defendant.

12 Before the Court is Proposed-Intervenor Progressive Leadership Alliance of Nevada’s  
13 (“PLAN”) Motion to Intervene on order shortening time. The Court held a hearing on PLAN’s  
14 Motion to Intervene on May 18, 2022. Counsel for all parties were present. The Court considered  
15 all of the papers filed by the parties and PLAN, and the files and records in this matter, and good  
16 cause appearing,

17 “In evaluating whether Rule 24(a)(2)’s requirements are met,” courts “construe the Rule  
18 ‘broadly in favor of proposed intervenors’ ... because ‘[a] liberal policy in favor of intervention  
19 serves both efficient resolution of issues and broadened access courts.’ *Wilderness Soc’y v. U.S.*  
20 *Forest Serv.*, 630 F.3d 1173, 1179 (9th Cir. 2011).

21 The Court finds that PLAN’s intervention as of right is warranted under Nevada Rule of  
22 Civil Procedure 24(a). Plaintiffs’ lawsuit aims to upend election processes in Clark County in ways  
23 that threaten to interfere with an orderly election. As part of its mission, PLAN emphasizes civic  
24 engagement, combats voter suppression, and seeks to ensure that all Nevada eligible voters have  
25 their votes counted. PLAN is particularly focused on empowering and ensuring that the right to vote  
26 of Nevada’s historically marginalized voters, including voters of color and young voters, are not  
27 denied that fundamental right. If Plaintiffs succeed in their efforts through this litigation to disrupt  
28 the election processes, PLAN’s mission to empower voters to make their voices heard through the

1 electoral process will be undercut. *See California v. United States*, 450 F.3d 436, 441 (9th Cir. 2006)  
2 (holding that “a party has a sufficient interest for intervention purposes if it will suffer a practical  
3 impairment of its interests as a result of the pending litigation” and that such intervention “has not  
4 turned on ... technical distinctions.”).

5 The Court is not persuaded by Plaintiffs’ argument that PLAN lacks standing for  
6 intervention. Where a proposed intervenor-defendant seeks the same ultimate relief as the existing  
7 defendants—here, the rejection of Plaintiffs’ claims—the intervenor does not need to show  
8 independent standing. *See Pennsylvania v. President of U.S.*, 888 F.3d 52, 57 n.2 (3d Cir. 2018)  
9 (“Because the Little Sisters moved to intervene as defendants and seek the same relief as the federal  
10 government, they need not demonstrate Article III standing.”).

11 Next, Plaintiffs argue that PLAN’s interests are adequately represented by Defendants. The  
12 Court disagrees with Plaintiffs’ contention. While the Secretary of State and Clark County Registrar  
13 of Voters have an undeniable interest in defending their actions and protecting elections  
14 administration, PLAN has a different focus: ensuring that every eligible voter in Nevada has a  
15 meaningful opportunity to cast a ballot and have that ballot counted, both in the upcoming primary  
16 election and in future elections, and that non-disruptive election observation remains possible as  
17 PLAN has conducted it in the past. *See Citizens for Balanced Use v. Montana Wilderness Ass’n*,  
18 647 F.3d 893, 898 (9th Cir. 2011) (“[T]he government’s representation of the public interest may  
19 not be ‘identical to the individual parochial interest’ of a particular group just because ‘both entities  
20 occupy the same posture in the litigation.’”).

21 Finally, the Court finds that the motion to intervene was timely, having been filed before any  
22 substantive activity in the case. Additionally and alternatively, the Court 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.

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1           **THEREFORE**, good cause appearing, Progressive Leadership Alliance of Nevada's  
2 Motion to Intervene is **GRANTED**, and Progressive Leadership Alliance of Nevada is accorded full  
3 rights of a party as Intervenor-Defendant.

4           DATED this 23 day of May, 2022.

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6 \_\_\_\_\_  
District Court Judge

7 Submitted by:

8 /s/ Bradley S. Schragger

9 UZOMA NKWONTA (D.C. Bar No. 975323) (pro hac vice forthcoming)  
10 DAVID R. FOX (D.C. Bar No. 1015031) (pro hac vice forthcoming)  
11 MAYA SEQUEIRA (D.C. Bar No. 1029352) (pro hac vice forthcoming)  
12 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

13 BRADLEY SCHRAGER (SBN 10217)  
14 DANIEL BRAVO (SBN 13078)  
**WOLF, RIFKIN, SHAPIRO,**  
**SCHULMAN & RABKIN, LLP**  
15 3773 Howard Hughes Parkway, Suite 590 South  
16 Las Vegas, Nevada 89169

17 *Attorneys for Intervenor-Defendant Progressive Leadership Alliance of Nevada*

18 Approved as to Form & Content:

19 **JENNINGS & FULTON, LTD.**

20 /s/ Adam R. Fulton

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

26 *Attorneys for Plaintiffs*

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28

/s/ Herbert Kaplan  
Christopher J. Hicks, District Attorney  
Herbert B. Kaplan, Deputy District Attorney  
Washoe County District Attorney  
One South Sierra St.  
Reno, Nevada 89501

*Attorneys for Defendant Deanna Spikula*

/s/ Craig Newby  
Aaron D. Ford, Attorney General  
Craig A. Newby, Deputy Solicitor General  
Laena St-Jules, Deputy Attorney General  
Office of the Attorney General  
555 E. Washington Ave., Ste. 3900  
Las Vegas, Nevada 89101

*Attorneys for Defendant Barbara Cegavske*

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