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AUDREY ROWLAND
BY Audrey Rowland
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1 ARMSTRONG TEASDALE LLP
2 JEFFREY F. BARR, ESQ.
3 Nevada Bar No. 7269
4 MICHELLE D. ALARIE, ESQ.
5 Nevada Bar No. 11894
6 3770 Howard Hughes Parkway, Suite 200
7 Las Vegas, Nevada 89169
8 Telephone: 702.678.5070
9 Facsimile: 702.878.9995
10 jbarr@atllp.com
11 malarie@atllp.com

12 *Attorneys for Intervenor-Defendant, R.I.S.E. Nevada –*
13 *Restoring Integrity in State Elections PAC*

14 **FIRST JUDICIAL DISTRICT COURT OF NEVADA**
15 **CARSON CITY**

16 EMILY PERSAUD-ZAMORA, an individual,
17 Plaintiff,

16 Case No.: 22 OC 00071 IB
17 Dept. No.: I

18 vs.

19 BARBARA CEGAVSKE, in her official capacity as
20 NEVADA SECRETARY OF STATE,
21 Defendant,

22 and

23 R.I.S.E. Nevada – Restore Integrity in State Elections
24 PAC,
25 Intervenor-Defendant.

26 **STIPULATION TO SET BRIEFING SCHEDULE AND HEARING ON PLAINTIFF'S**
27 **MEMORANDUM IN SUPPORT OF COMPLAINT FOR DECLARATORY AND**
28 **INJUNCTIVE RELIEF CHALLENGING INITIATIVE PETITION S-05-2022; AND ORDER**

Plaintiff, Emily Persaud-Zamora (“Plaintiff-Challenger”), by and through her counsel of record, Wolf Rifkin, Shapiro, Schulman & Rabkin, LLP, and Defendant Barbara Cegavske, in her official capacity as Nevada Secretary of State (“Secretary”), by and through her counsel of record, Craig Newby, Esq., Deputy Solicitor General, and Laena St Jules, Deputy Attorney General, and Intervenor-Defendant, R.I.S.E. Nevada – Restoring Integrity in State Election PAC (“R.I.S.E.”), by and through its counsel, Armstrong Teasdale LLP, hereby submit this stipulation to set a briefing

1 schedule for the Memorandum in Support of Complaint for Declaratory and Injunctive Relief
2 Challenging Initiative Petition S-05-2022 and schedule a hearing as soon as this Court's schedule
3 permits on or after July 11, 2022.

4 On June 6, 2022, Plaintiff-Challenger filed her Complaint for Declaratory and Injunctive
5 Relief Challenging Initiative Petition S-05-2022 ("Complaint"). The Complaint is brought under
6 NRS 295.061(1). Concurrently, Plaintiff-Challenger also filed her Memorandum in Support of
7 Complaint for Declaratory and Injunctive Relief Challenging Initiative Petition S-05-2022
8 ("Memorandum in Support of Complaint").

9 NRS 295.061(1) provides, in relevant part,

10 Whether an initiative or referendum embraces but one subject and
11 matters necessarily connected therewith and pertaining thereto, and
12 the description of the effect of an initiative or referendum required
13 pursuant to NRS 295.009, may be challenged by filing a complaint
14 in the First Judicial District Court not later than 15 days,
15 Saturdays, Sundays and holidays excluded, after a copy of the
16 petition is placed on file with the Secretary of State pursuant
17 to NRS 295.015. . . . The court shall set the matter for hearing not
18 later than 15 days after the complaint is filed and shall give priority
19 to such a complaint over all other matters pending with the court,
20 except for criminal proceedings.

21 Whereas, on June 22, 2022, Senior Judge William A. Maddox set a hearing on this matter for
22 June 28, 2022, at 1:30 p.m.

23 Whereas, Plaintiff-Challenger and the Secretary have consented to permit R.I.S.E. to
24 intervene as a defendant in this action. A Stipulation and Order to accomplish the intervention has
25 been executed by all parties, and will be delivered to the Clerk's office shortly.

26 Whereas, the parties desire to reschedule the hearing on this matter and set a briefing
27 schedule that permits the Secretary and R.I.S.E. to file their respective responses to the
28 Memorandum in Support of Complaint and for Plaintiff-Challenger to file her optional reply brief.

Accordingly, the parties stipulate and agree as follows:

1. The parties agree to waive the requirement in NRS 295.061(1) that a hearing on the
Complaint be set not later than 15 days after the complaint is filed.

1 2. The hearing on this matter presently set for June 28, 2022, at 1:30 p.m. shall be
2 vacated.

3 3. The Secretary and R.I.S.E. shall have until Friday, July 1, 2022, at 5:00 p.m. PST to
4 submit their respective response briefs to the Memorandum in Support of Complaint. Such response
5 briefs shall be limited to ten (10) pages per FJDCR 3.23(b).

6 4. Plaintiff-Challenger shall have until Friday, July 8, 2022, at 5:00 p.m. PST to submit
7 her optional reply brief in support of the Memorandum in Support of Complaint. Such reply brief
8 shall be limited to five (5) pages per FJDCR 3.23(b).

9 5. Pursuant to FJDCR 3.11, Plaintiff-Challenger shall file a Request for Submission
10 after the filing of her reply brief, but if no reply brief is filed, then as soon as practical after the
11 response briefs are filed.

12 6. The parties agree to electronic service of all documents amongst themselves.

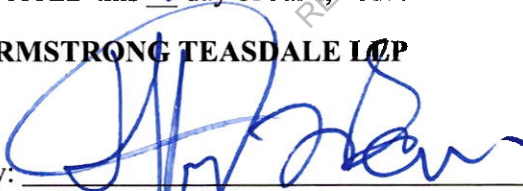
13 7. The parties agree that the hearing on the Complaint and Memorandum in Support of
14 Complaint may be heard as soon as this Court's schedule permits on or after July 11, 2022. The
15 parties respectfully request that the hearing be scheduled in the afternoon to accommodate travel for
16 counsel located in Las Vegas, Nevada.

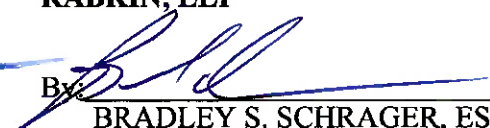
17 DATED this 23 day of June, 2022.

17 DATED this 23 day of June, 2022.

18 **ARMSTRONG TEASDALE LLP**

18 **WOLF, RIFKIN, SHAPIRO, SCHULMAN &
19 RABKIN, LLP**

20 By: 
21 JEFFREY H. BARR, ESQ.
22 Nevada Bar No. 7269
23 MICHELLE D. ALARIE, ESQ.
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25 3770 Howard Hughes Parkway, Suite 200
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27 jbarr@atllp.com
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20 By: 
21 BRADLEY S. SCHRAGER, ESQ.
22 Nevada Bar No. 10217
23 JOHN SAMBERG, ESQ.
24 Nevada Bar No. 10828
25 DANIEL BRAVO, ESQ.
26 Nevada Bar No. 13078
27 3773 Howard Hughes Pkwy, Ste 590 S
28 Las Vegas, Nevada 89169
 bschrager@wrslawyers.com

26 Attorneys for proposed Defendant-Intervenor,
27 R.I.S.E. Nevada – Restore Integrity in State
28 Elections PAC

26 Attorneys for Plaintiff Emily Persaud-
27 Zamora

28 ///

1 DATED this __ day of June, 2022.

2 **NEVADA OFFICE OF THE ATTORNEY**
3 **GENERAL**

4 By: AARON FORD, ATTORNEY GENERAL
5 CRAIG A. NEWBY, ESQ.
6 Deputy Solicitor General
7 Nevada Bar No. 8591
8 LAENA ST JULES, ESQ.
9 Deputy Attorney General
10 Nevada Bar No. 15156
11 555 E. Washington Ave., Ste. 3900
12 Las Vegas, Nevada 89101
13 cnewby@ag.nv.gov

14 *Attorneys for Defendant Barbara Cegavske, in*
15 *her official capacity as Nevada Secretary of*
16 *State*

17 Now, therefore, based on the foregoing stipulation between the parties,

18 IT IS HEREBY ORDERED that the hearing on this matter presently set for June 28, 2022, at
19 1:30 p.m. is VACATED;

20 IT IS FURTHER ORDERED that the stipulated briefing schedule is adopted in full. The
21 Secretary and R.I.S.E. shall have until Friday, July 1, 2022, at 5:00 p.m. PST to submit their
22 respective response briefs, and Plaintiff-Challenger shall have until Friday, July 8, 2022, at 5:00 p.m.
23 PST to submit her optional reply brief;

24 IT IS FURTHER ORDERED that the above dates and times are the deadlines by which the
25 parties must electronically serve copies of the filings at issue on all other parties and email the filing
26 to this Court's judicial assistant, Julie Harkleroad, at jharkleroad@carson.org. Physical copies must
27 be filed with the Court as soon as practicable thereafter, preferably on the first day following the
28 deadline on which the clerk's office is open for filing.

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1 IT IS FURTHER ORDERED that pursuant to FJDCR 3.10, the parties shall have until
2 _____, 2022, at _____ .m. PST to submit proposed orders, with a
3 cover sheet, that includes findings of fact, applicable standards of law, analysis, and conclusions of
4 law. The parties shall send to the Court and opposing counsel an electronic copy in Word, or some
5 similar format.

6 IT IS FURTHER ORDERED that the hearing on this matter shall be reset to
7 _____, 2022, at _____ .m. PST.

8 **IT IS SO ORDERED.**

9 Dated this ____ day of June, 2022.

10
11 _____
12 DISTRICT COURT JUDGE

13 Respectfully submitted by:

14 ARMSTRONG TEASDALE LLP

15
16 By: 

17 JEFFREY F. BARR, ESQ.

18 Nevada Bar No. 7269

19 MICHELLE D. ALARIE, ESQ.

20 Nevada Bar No. 11894

21 3770 Howard Hughes Parkway, Suite 200

22 Las Vegas, Nevada 89169

23 *Attorneys for proposed Defendant-Intervenor,*
24 *R.I.S.E. Nevada – Restore Integrity in State Elections PAC*

25 **AFFIRMATION**

26 The undersigned hereby affirms that the preceding document does not contain the social
27 security number of any person.

28 Dated this 15 day of June, 2022.


29 Jeffrey F. Barr, Esq.

30 Nevada Bar No. 7269

31 Armstrong Teasdale LLP

1 IT IS FURTHER ORDERED that pursuant to FJDCR 3.10, the parties shall have until
2 July 14, 2022, at 5:00 .m. PST to submit proposed orders, with a
3 cover sheet, that includes findings of fact, applicable standards of law, analysis, and conclusions of
4 law. The parties shall send to the Court and opposing counsel an electronic copy in Word, or some
5 similar format.

6 IT IS FURTHER ORDERED that the hearing on this matter shall be reset to
7 July 18, 2022, at 3:00 .m. PST.

8 **IT IS SO ORDERED.**

9 Dated this 24 day of June, 2022.

10 William G. Maddox
11 DISTRICT COURT JUDGE

12
13 Respectfully submitted by:

14 ARMSTRONG TEASDALE LLP

15 [Signature]
16 By: JEFFREY F. BARR, ESQ.
17 Nevada Bar No. 7269
18 MICHELLE D. ALARIE, ESQ.
19 Nevada Bar No. 11894
3770 Howard Hughes Parkway, Suite 200
Las Vegas, Nevada 89169

20 *Attorneys for proposed Defendant-Intervenor,*
21 *R.I.S.E. Nevada – Restore Integrity in State Elections PAC*

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26 [Signature]
27 Jeffrey F. Barr, Esq.
28 Nevada Bar No. 7269
Armstrong Teasdale LLP

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2 Nevada Bar No. 7269
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6 jbarr@atllp.com
malarie@atllp.com

7 *Attorneys for Intervenor-Defendant, R.I.S.E. Nevada –*
8 *Restoring Integrity in State Elections PAC*

9
10 **FIRST JUDICIAL DISTRICT COURT OF NEVADA**
CARSON CITY

11 EMILY PERSAUD-ZAMORA, an individual,
12
13 Plaintiff,

Case No.: 22 OC 00071 IB
Dept. No.: I

14 vs.

15 BARBARA CEGAVSKE, in her official capacity as
NEVADA SECRETARY OF STATE,
16
17 Defendant,

18 and

19 R.I.S.E. Nevada – Restore Integrity in State Elections
PAC,
20
21 Intervenor-Defendant.

22 **STIPULATION TO SET BRIEFING SCHEDULE AND HEARING ON PLAINTIFF'S**
MEMORANDUM IN SUPPORT OF COMPLAINT FOR DECLARATORY AND
INJUNCTIVE RELIEF CHALLENGING INITIATIVE PETITION S-05-2022; AND ORDER

23 Plaintiff, Emily Persaud-Zamora (“Plaintiff-Challenger”), by and through her counsel of
24 record, Wolf Rifkin, Shapiro, Schulman & Rabkin, LLP, and Defendant Barbara Cegavske, in her
25 official capacity as Nevada Secretary of State (“Secretary”), by and through her counsel of record,
26 Craig Newby, Esq., Deputy Solicitor General, and Laena St Jules, Deputy Attorney General, and
27 Intervenor-Defendant, R.I.S.E. Nevada – Restoring Integrity in State Election PAC (“R.I.S.E.”), by
28 and through its counsel, Armstrong Teasdale LLP, hereby submit this stipulation to set a briefing

1 schedule for the Memorandum in Support of Complaint for Declaratory and Injunctive Relief
2 Challenging Initiative Petition S-05-2022 and schedule a hearing as soon as this Court's schedule
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21 been executed by all parties, and will be delivered to the Clerk's office shortly.

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23 schedule that permits the Secretary and R.I.S.E. to file their respective responses to the
24 Memorandum in Support of Complaint and for Plaintiff-Challenger to file her optional reply brief.

25 Accordingly, the parties stipulate and agree as follows:

26 1. The parties agree to waive the requirement in NRS 295.061(1) that a hearing on the
27 Complaint be set not later than 15 days after the complaint is filed.

1 2. The hearing on this matter presently set for June 28, 2022, at 1:30 p.m. shall be
2 vacated.

3 3. The Secretary and R.I.S.E. shall have until Friday, July 1, 2022, at 5:00 p.m. PST to
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15 parties respectfully request that the hearing be scheduled in the afternoon to accommodate travel for
16 counsel located in Las Vegas, Nevada.

17 DATED this ___ day of June, 2022.

 DATED this ___ day of June, 2022.

18 **ARMSTRONG TEASDALE LLP**

**WOLF, RIFKIN, SHAPIRO, SCHULMAN &
19 RABKIN, LLP**

20
21 By: _____
 JEFFREY F. BARR, ESQ.
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 By: _____
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 DANIEL BRAVO, ESQ.
 Nevada Bar No. 13078
 3773 Howard Hughes Pkwy, Ste 590 S
 Las Vegas, Nevada 89169
 bschrager@wrslawyers.com

25
26 *Attorneys for proposed Defendant-Intervenor,*
27 *R.I.S.E. Nevada – Restore Integrity in State*
Elections PAC

Attorneys for Plaintiff Emily Persaud-
Zamora

28 ///

1 DATED this __ day of June, 2022.

2 **NEVADA OFFICE OF THE ATTORNEY**
3 **GENERAL**

4 By:  (4805) fsc.

5 AARON FORD, ATTORNEY GENERAL
6 CRAIG A. NEWBY, ESQ.
7 Deputy Solicitor General
8 Nevada Bar No. 8591
9 LAENA ST JULES, ESQ
Deputy Attorney General
Nevada Bar No. 15156
555 E. Washington Ave., Ste. 3900
Las Vegas, Nevada 89101
cnewby@ag.nv.gov

10 *Attorneys for Defendant Barbara Cegavske, in*
11 *her official capacity as Nevada Secretary of*
12 *State*

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5 similar format.

6 IT IS FURTHER ORDERED that the hearing on this matter shall be reset to
7 July 18, 2022, at 3:00 .m. PST.

8 **IT IS SO ORDERED.**
9 Dated this 24 day of June, 2022.

10 William G. Maddox
11 DISTRICT COURT JUDGE

12
13 Respectfully submitted by:
14 ARMSTRONG TEASDALE LLP

15
16 By: _____
17 JEFFREY F. BARR, ESQ.
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Las Vegas, Nevada 89169

20 *Attorneys for proposed Defendant-Intervenor,*
21 *R.I.S.E. Nevada – Restore Integrity in State Elections PAC*

22 **AFFIRMATION**

23 The undersigned hereby affirms that the preceding document does not contain the social
24 security number of any person.

25 Dated this ___ day of June, 2022.

26 _____
27 Jeffrey F. Barr, Esq.
28 Nevada Bar No. 7269
Armstrong Teasdale LLP