## case 2:24-cv-00518-CDS-MDC Document 102 Filed 07/16/24 Page 1 of 4

1	Katherine F. Parks, Esq.	
2	Nevada Bar No. 6227 Aileen E. Cohen, Esq.	
3	Nevada Bar No. 5263 Thorndal Armstrong, PC	
4	6590 S. McCarran Blvd., Suite B Reno, Nevada 89509	
5	Tel: (775) 786-2882 kfp@thorndal.com	
6	aec@thorndal.com Attorneys for Defendant	
7	JIM HINDLE, in his official capacity as clerk for	r Storey County
8	UNITED STATES	DISTRICT COURT
9	DISTRICT OF NEVADA	
10	REPUBLICAN NATIONAL COMMITTEE,	As a second
11	NEVADA REPUBLICAN PARTY, and SCOTT JOHNSTON,	Y.CO.
12	,	Case No. 2:24-cv-00518-CDS-MDC
13	Plaintiffs,	DEFENDANTE HAVIHANDI E : 1: 60° : 1
14	VS.	DEFENDANT JIM HINDLE, in his official capacity as clerk for Storey County's,
15	FRANCISCO AGUILAR, in his official capacity as Nevada Secretary of State;	OF STATE'S MOTION TO DISMISS
	LÔRENA PORTILLO, in her official capacity as the Registrar of Voters for Clark County;	FIRST AMENDED COMPLAINT [ECF 101]
16	WILLIAM "SCOTT" HOEN, AMY BURGANS, STACI LINDBERG, and JIM	
17	HINDLE, in their official capacities as County Clerks,	
18	Defendants.	
19		
20		, in his official capacity as clerk for Storey
21	County, by and through his attorneys Thorndal A	
22	Secretary of State's Motion to Dismiss First Ame	
23	2024. Defendant Jim Hindle hereby incorporates	s the same arguments and grounds as stated
24		
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#### tase 2:24-cv-00518-CDS-MDC Document 102 Filed 07/16/24 Page 2 of 4

therein as through fully set forth herein. DATED this 16<sup>th</sup> day of July, 2024. THORNDAL ARMSTRONG, PC By: /s/ Katherine Parks
KATHERINE F. PARKS, ESQ.
Nevada Bar No. 6227
AILEEN E. COHEN, ESQ. Nevada Bar No. 5263 6590 S. McCarran Blvd., Suite B Reno, Nevada 89509 Attorneys for Defendant JIM HINDLE, in his official capacity as Sta Sta Start Report De La Carte de La Car clerk for Storey County 

**CERTIFICATE OF SERVICE** 1 2 Pursuant to FRCP 5(b), I certify that I am an employee of Thorndal Armstrong, PC, and 3 that on this date I caused the foregoing DEFENDANT JIM HINDLE, in his official capacity as 4 clerk for Storey County's, JOINDER IN DEFENDANT SECRETARY OF STATE'S MOTION 5 TO DISMISS FIRST AMENDED COMPLAINT [ECF 101] to be served on all parties to this action by: 6 7 placing an original or true copy thereof in a sealed, postage prepaid, envelope in the 8 United States mail at Reno, Nevada. 9 X United States District Court CM/ECF system 10 electronic means (fax, electronic mail, etc.) Federal Express/UPS or other overnight delivery 11 12 fully addressed as follows: 13 David R. Fox, Esq. Jeffrey F. Barr, Esq. 14 8275 South Eastern Avenue, Suite 200 Christopher D. Dodge, Esq. Las Vegas, NV 89123 Marisa A. O'Gara, Esq. 15 Elias Law Group LLP 16 250 Massachusetts Ave NW, Suite 400 Thomas R. McCarthy, Esq. Gilbert C. Dickey, Esq. Washington, DC 20001 17 Conor D. Woodfin, Esq. 1600 Wilson Blvd., Suite 700 Bradley S. Schrager, Esq. 18 Arlington, VA 22209 Daniel Bravo, Esq. 19 Bravo Schrager LLP Attorneys for Plainiffs 6675 South Tenaya Way, Suite 200 20 Las Vegas, NV 89113 21 Attorneys for Intervenor Defendants Rise Action Fund, Institute for a Progressive 22 Nevada, and Nevada Alliance for Retired Americans 23 24 Sigal Chattah, Esq. Aaron D. Ford, Attorney General 5875 S. Rainbow Blvd., #204 Laena St.-Jules, Esq. 25 Las Vegas, NV 89118 Senior Deputy Attorney General Attorney for Plaintiff Office of the Attorney General 26 Nevada Republican Party 100 North Carson Street 27 Carson City, NV 89701 Attorneys for Defendant Secretary of State 28

## case 2:24-cv-00518-CDS-MDC Document 102 Filed 07/16/24 Page 4 of 4

1	Jason D. Woodbury Carson City District Attorney	Stephen B. Rye Lyon County District Attorney
2	Benjamin R. Johnson, Esq.	31 S. Main Street
	885 East Musser Street, Ste. 2030	Yerington, NV 89447
3	Carson City, NV 89701	Attorney for Defendant Staci Lingberg, in her
4	Attorneys for Defendant William "Scott"	Official Capacity as Lyon County Clerk-
_	Hoen, in his Official Capacity as Carson City	Treasurer
5	Clerk-Recorder	
6	Mark B. Jackson	Steven B. Wolfson
7	Douglas County District Attorney	Clark County District Attorney
/	Cynthea Gregory	Lisa Logsdon
8	Deputy District Attorney	Nichole Kazimirovicz
9	Douglas County District Attorney's Office	500 South Grand Central Pkwy. 5th Floor, Ste
9	1038 Buckeye Road	5075
10	P.O. Box 218	Las Vegas, Nevada 89155-2215
11	Minden, Nevada 89423 Attorneys for Defendant Amy Burgans,	Attorneys for Defendant Lorena Portillo Clark County Registrar of Voters
11	Douglas County Clerk	County Registrar by voters
12		20C.
13	Kevin J. Hamilton, Esq.	-40
	Margo S. Jasukaitis, Esq.	9
14	Perkins Coie LLP	
15	1201 Third Avenue, Suite 4900	
1.6	Seattle, WA 98101	
16	Douglas County Clerk  Kevin J. Hamilton, Esq. Margo S. Jasukaitis, Esq. Perkins Coie LLP 1201 Third Avenue, Suite 4900 Seattle, WA 98101  Devon T. Reese, Esq. Nathan R. Ring, Esq. Alex Velto, Esq.	
17	Nathan R. Ring, Esq.	
18	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
10	Reese Ring Velto, PLIC	
19	200 S. Virginia Street, Suite 655	
20	Reno, NV 89501  Attorneys for the Democratic National	
	Committee	
21		
22	DATED this 16 <sup>th</sup> day of July, 2024.	
	DATED this to day of July, 2024.	
23		//
24		/s/ Laura Bautista An employee of Thorndal Armstrong, PC
25		The employee of Thornau Timistions, I c
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AMY BURGANS, joins Defendant Secretary of State's Motion to Dismiss First Amended Complaint in its entirety, thereby adopting the supporting points and authorities filed therein, and respectfully requests an Order from this court dismissing Plaintiff's First Amended Complaint for Declaratory and Injunctive Relief [ECF 98].

DATED this 16<sup>th</sup> day of July, 2024.

MARK B. JACKSON Douglas County District Attorney

By: /s/ Cynthea Gregory
Cynthea Gregory
1038 Buckeye Road
PO Box 218
Minden, Nevada 89423
Tel: 775-782-9803
cgregory@douglas.nv.gov

Attorneys for Amy Burgans, Douglas County Clerk

Douglas County District Attorney
Post Office Box 218
Minden, Nevada 89423
(775) 782-9803 Fax (775) 783-6490

- -

#### **CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of the Douglas County District Attorney's Office, and that on this 16<sup>th</sup> day of July, 2024, the foregoing **DEFENDANT DOUGLAS COUNTY CLERK AMY BURGANS', JOINDER IN SECRETARY OF STATE'S MOTION TO DISMISS FIRST AMENDED COMPLAINT [ECF 101]** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

/s/ Juley Frank

An Employee of the Douglas County District Attorney's Office

STEPHEN B. RYE 1 District Attorney Nevada Bar No. 5761 2 Lyon County District Attorney's Office 31 S. Main Street 3 Yerington, NV 89447 Tel. (775)463-6511 4 Fax (775)463-6516 Email: srye@lyon-county.org 5 Attorney for Staci Lindberg 6 UNITED STATES DISTRICT COURT 7 **DISTRICT OF NEVADA** 8 9 REPUBLICAN NATIONAL COMMITTEE, NEVADA REPUBLICAN PARTY, and SCOTT 10 IOHNSTON Case No. 2:24-cv-00518-CDS-MDC 11 Plaintiffs, 12 **DEFENDANT STACI LINDBERG'S** 13 FRANCISCO AGUILAR, in his official capacity as JOINDER IN DEFENDANT SECRETARY Nevada Secretary of State; LORENA PORTILLO, OF STATE'S MOTION TO DISMISS In her official capacity as the Registrar of Voters for FIRST AMENDED COMPLAINT Clark County; WILLIAM "SCOTT" HOEN, AMY BURGANS, STACI LINDBERG, and JIM HINDLE, in their official capacities as County 16 Clerks, 17 Defendants. 18 Defendant, STACI LINDBERG, in her official capacity as the Lyon County Clerk-Treasurer, by 19 and through counsel, STEPHEN B. RYE, District Attorney of Lyon County, hereby joins the Nevada 20 Secretary of State's Motion to Dismiss First Amended Complaint (ECF No. 101). Defendant STACI 21 LINDBERG joins the Motion to Dismiss First Amended Complaint in its entirety and incorporates and 22 adopts the supporting memorandum of points and authorities and arguments of the Motion as if fully set 23 forth herein. 24

1	Defendant STACI LINDBERG respectfully requests an Order from this Court dismissing
2	Plaintiffs' First Amended Complaint.
3	Dated this 16 <sup>th</sup> day of July, 2024.
4	STEPHEN B. RYE
5	Lyon County District Attorney
6	/s/ Stephen B. Rye
7	Stephen B. Rye Bar No. 5761
8	Lyon County District Attorney 31 S. Main Street
9	Yerington, NV 89447 (775)4632-6511
10	(775)463-6516 (fax) srye@lyon-county.org
11	
12	Attorney for Defendant Staci Lindberg, Lyon County Clerk-Treasurer
13	220
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16	ERO.
17	Clerk-Treasurer
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#### **CERTIFICATE OF SERVICE**

I certify that I am an employee of the Lyon County District Attorney's Office and that on this 16<sup>th</sup> day of July, 2024, **DEFENDANT STACI LINDEBRG'S JOINDER IN DEFENDANT SECRETARY OF STATE'S MOTION TO DISMISS FIRST AMENDED COMPLAINT (ECF No. 101)** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

An employee of the Lyon County
District Attorney's Office

RETRIEVED FROM DEMOCRACYDOCKET, COM

1	STEVEN B. WOLFSON		
2	District Attorney CIVIL DIVISION		
3	State Bar No. 001565 By: LISA V. LOGSDON COUNTY COUNSEL		
4	State Bar No. 011409 500 South Grand Central Pkwy.		
5	5 <sup>th</sup> Floor, Ste. 5075		
6	Las Vegas, Nevada 89155-2215 (702) 455-4761		
7	Fax (702) 382-5178 E-Mail: Lisa.Logsdon@ClarkCountyDA.com		
8	Attorneys for Defendant Lorena Portillo		
9	UNITED STATES DISTRICT COURT		
10	DISTRICT OF NEVADA		
11	REPUBLICAN NATIONAL COMMITTEE, ) Case No: 2:24-cv-00518		
12	NEVADA REPUBLICAN PARTY, and SCOTT JOHNSTON,		
13	Plaintiff, DEFENDANT LORENA PORTILLO'S JOINDER TO		
14	vs. ) DEFENDANT SECRETARY OF STATE'S MOTION TO DISMISS		
15	FRANCISCO AGUILAR, in his official capacity as Nevada Secretary of State;  FIRST AMENDED COMPLAINT  FIRST AMENDED COMPLAINT		
16	LÔRENA PORTILLO, in her official )		
17	capacity as the Registrar of Voters for Clark ) County; WILLIAM "SCOTT" HOEN, AMY )		
18	BURGAINS, STACI LINDBERG, and JIM ) HINDLE, in their official capacities as ) County Clerks, )		
19	Defendants.		
20	Defendants.		
21			
22	COMES NOW Defendant, LORENA PORTILLO, Clark County Registrar of Voters	١,	
23	by and through its attorney, STEVEN B. WOLFSON, District Attorney, by LISA V.		
24	LOGSDON, County Counsel, and hereby joins in Defendant, Secretary of State's Motion to	)	
25	Dismiss First Amended Complaint.		
26	Defendant, LORENA PORTILLO, Clark County Registrar of Voters joins Defendan	ıt,	
27	Secretary of State's Motion to Dismiss First Amended Complaint in its entirety, thereby		
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1 adopting the supporting points and authorities filed therein, and respectfully requests an 2 Order from this Court Dismissing Plaintiffs First Amended Complaint. DATED this 16th day of July, 2024. 3 STEVEN B. WOLFSON 4 DISTRICT ATTORNEY 5 By: /s/Lisa V. Logsdon 6 LISA V. LOĞSDON, COUNTY COUNSEL State Bar No. 011409 7 500 South Grand Central Pkwy. 5<sup>th</sup> Floor, Ste. 5075 8 Las Vegas, Nevada 89155-2215 Attorney for Defendant 9 Lorena Portillo 10 **CERTIFICATE OF SERVICE** 11 I certify that I am an employee of the Office of the Clark County District Attorney and 12 that on this 16<sup>th</sup> day of July, 2024, I served a true and correct copy of the foregoing **Defendant** 13 Lorena Portillo's Joinder to Defendant Secretary of State's Motion to Dismiss First 14 Amended Complaint through CM/ECF Electronic Filing system of the United States District 15 Court for the District of Nevada (or, if necessary, by U.S. Mail, first class, postage pre-paid), 16 upon the following: 17 Jeffrey F. Barr, Esq. Sigal Chattah, Esq. Nevada Bar #7269 Nevada Bar #8264 18 8275 South Eastern Avenue, Suite 200 5875 S. Rainbow Blvd. #204 Las Vegas, NV 89123 Las Vegas, NV 89118 19 barri@ashcraftbarr.com sigal@thegoodlawyerlv.com Counsel for the Nevada Republican Party 20 Thomas R. McCarthy, Esq. VA Bar #47145 David R. Fox 21 Gilbert C. Dickey, Esq. Nevada Bar No. 16536 Christopher D. Dodge, Esq. VA Bar #98858 22 Conor D. Woodfin, Esq. (pro hac vic forthcoming) VA Bar #989377 Marisa A. O'Gara, Esq. 23 1600 Wilson Boulevard, Suite 700 (pro hac vice forthcoming) Arlington, VA 22209 **Élias Law Group LLP** 24 tom@consovoymccarthy.com 250 Massachusetts Ave NW, Suite 400 gilbert@consovoymccarthy.com Washington, DC 20001 25 dfox@elias.law cdodge@elias.law conor@consovoymccarthy.com mogara@elias.law 26 Counsel for the Republican National Committee, the Nevada Republican Party, 27 and Scott Johnston 28 ///

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4	Vegas, NV 89113	•
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5	daniel@bravoschrager.com	Brownstein Hyatt Farber Schreck, LLP
	Attorneys for Intervenor-Defendants	100 N. City Parkway
6	Rise Action Fund, Institute for a	Ste 1600
	Progressive Nevada, and Nevada Alliance	Las Vegas, NV 89106
7	for Retired Americans	dstewart@bhfs.com
		Attorneys for Intervenor Defendant
8	Aileen E. Cohen, Esq.	Democratic National Committee
	Thorndal Armstrong, PC	
9	1100 E. Bridger Avenue	Benjamin Robert Johnson
	Las Vegas, NV 89101	Carson City District Attorney
10	aec@thorndal.com	State of Nevada - Office of the Attorney
		General
11	Katherine F. Parks, Esq.	885 E. Musser Street
	Thorndal Armstrong, PC	Suite 2030
12	6590 S. McCarran Blvd., #B	Carson City, NV 89701
	Reno, NV 89509	bjohnson@carson.org
13	kfp@thorndal.com	Josep D. Woodbury
	Attorneys for Defendant	Jason D. Woodbury Carson City District Attorney's Office
14	Jim Hindle, Storey County Clerk	885 E. Musser Street
	kfp@thorndal.com Attorneys for Defendant Jim Hindle, Storey County Clerk  Kevin J. Hamilton Perkins Coie LLP 1201 Third Avenue Suite 4900 Seattle, WA 98101-3099	Ste 2030
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16	Suite 4900	Attorneys for Defendant
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10	.O.W	,
18	Margo S. Jasukaitis	Stephen B Rye
19	Perkins Coie LLP	Lyon County District Attorney
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20	#4900	Yerington, NV 89447
20	Seattle, WA 98101	srye@lyon-county.org
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21		Lyon County Clerk
22	Devon T. Reese	
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23	200 S. Virginia Street	Campaign Legal Center
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25	Nothen D. Ding	amulji@campaignlegal.org
	Nathan R. Ring	
26	Reese Ring Velto PLLC 3100 W. Charleston Blvd.	
_	Ste. 208	
27	Las Vegas, NV 89102	
.	nathan@rrvlawyers.com	
28		

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## Case 2:24-cv-00518-CDS-MDC Document 106 Filed 07/16/24 Page 4 of 4

1	Sadmira Ramic	Cynthea Gregory, Esq. Douglas County District Attorney
2	ACLU of Nevada 601 S. Rancho Dr.	P.O. Box 218
3	Ste B-11 Las Vegas, NV 89106	Minden, NV 89423 cgregory@douglas.nv.gov
4	ramic@aclunv.org Attorneys for Intervenor Defendant	Attorneys for Defendant Amy Burgans
5	ACLU of Nevada	Doughlas County Clerk
6	Laena St-Jules Office of the Nevada Attorney General	
7	100 North Carson Street Carson City, NV 89701 <a href="mailto:lstjules@ag.nv.gov">lstjules@ag.nv.gov</a>	
8	Attorneys for Defendant Francisco Aguilar	
9	Transcisco Hgunan	/s/ Afeni Banks
10		An Employee of the Clark County District
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Office of the District Attorney

JASON WOODBURY DISTRICT ATTORNEY
District Attorney
Nevada Bar No. 6870
BENJAMIN R. JOHNSON
Senior Deputy District Attorney
Nevada Bar No. 10632
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Carson City, Nevada 89701
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E-mail: jwoodbury@carson.or
bjohnson@carson.org

# UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

REPUBLICAN NATIONAL COMMITTEE, NEVADA REPUBLICAN PARTY, and SCOTT JOHNSTON,

Plaintiffs,

VS.

FRANCISCO AGUILAR, in his official capacity as Nevada Secretary of State; LORENA PORTILLO, in her official capacity as the Registrar of Voters for Clark County; WILLIAM "SCOTT" HOEN, AMY BURGANS, STACI LINDBERG, and JIM HINDLE, in their official capacities as County Clerks,

Defendants.

Case No. 2:24-cv-00518-CDS-MDC

DEFENDANT WILLIAM "SCOTT"
HOEN'S JOINDER IN DEFENDANT
SECRETARY OF STATE'S MOTION
TO DISMISS FIRST AMENDED
COMPLAINT [ECF 101]

Defendant, WILLIAM "SCOTT" HOEN, in his official capacity as the Clerk-Recorder for the Consolidated Municipality of Carson City, by and through counsel, JASON D. WOODBURY, District Attorney and BENJAMIN R. JOHNSON, Senior Deputy District Attorney, hereby joins the Nevada Secretary of State's Motion to Dismiss (ECF No. 111) filed on July 16, 2024.

Defendant HOEN joins the Motion to Dismiss in its entirety and incorporates and adopts the supporting memorandum of points and authorities and arguments of the Motion as if fully set forth herein.

1	Defendant HOEN respectfully requests an Order from this Court dismissing Plaintiffs'		
2	First Amended Complaint for Declaratory and Injunctive Relief [ECF No. 98].		
3	DATED this 17th day of July, 2024.		
4			
5	JASON D. WOODBURY District Attorney		
6			
7	By: <u>/s/Benjamin R. Johnson</u> BENJAMIN R. JOHNSON		
8	Senior Deputy District Attorney Nevada Bar No. 10632		
9	885 East Musser Street Suite 2030		
10	Carson City, Nevada 89701		
11	T: 775.887.2070 F: 775.887.2129		
12 8 12	E-mail: bjohnson@carson.org		
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885 East Musser St., Sulle 2030, Carson Cup, Nevada 89/01 Tel: (775) 887-2070 Fax: (775) 887-2129 1 1 2 1 5 1 6 7 7 7 8 8 7 7 8 7 8 7 8 7 8 7 8 7 8 7	ZETRIEBER FROM DENI CRACYTO		
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**Carson City, Nevada** 885 East Musser St., Suite 2030, Carson City, Nevada 89701 Tel.: (775) 887-2070 Fax: (775) 887-2129 Office of the District Attorney 

#### **CERTIFICATE OF SERVICE**

I certify that I electronically filed the foregoing DEFENDANT WILLIAM "SCOTT" HOEN'S JOINDER IN DEFENDANT SECRETARY OF STATE'S MOTION TO DISMISS FIRST AMENDED COMPLAINT with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 17th day of July, 2024. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system on all parties or persons requiring notice.

#### /s/ Felecia Casci

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REFRENED FROM DEMOCRACY DOCKET. An Employee of the Carson City District Attorney's Office