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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 REPUBLICAN NATIONAL COMMITTEE,
18 NEVADA REPUBLICAN PARTY, and
19 SCOTT JOHNSTON,

20 Plaintiffs,

21 vs.

22 FRANCISCO AGUILAR, in his official
23 capacity as Nevada Secretary of State;
24 LORENA PORTILLO, in her official capacity
25 as the Registrar of Voters for Clark County;
26 WILLIAM "SCOTT" HOEN, AMY BURGANS,
27 STACI LINDBERG, and JIM HINDLE, in their
28 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**

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. 26).

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.

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Office of the District Attorney
Carson City, Nevada
885 East Musser St., Suite 2030, Carson City, Nevada 89701
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1 Defendant HOEN respectfully requests an Order from this Court dismissing Plaintiffs'
2 Complaint for Declaratory and Injunctive Relief.

3 DATED this 18th day of April, 2024.

4
5 JASON D. WOODBURY
6 District Attorney

7 By: /s/Benjamin R. Johnson
8 BENJAMIN R. JOHNSON
9 Senior Deputy District Attorney
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CERTIFICATE OF SERVICE

1 I certify that I electronically filed the foregoing **DEFENDANT WILLIAM “SCOTT”**
2 **HOEN’S JOINDER IN DEFENDANT SECRETARY OF STATE’S MOTION TO DISMISS** with
3 the Clerk of the Court for the United States District Court by using the court’s CM/ECF
4 system on the 18th day of April, 2024. I further certify that all participants in the case are
5 registered CM/ECF users and that service will be accomplished by the CM/ECF system as
6 follows:

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17 *Counsel for the Nevada Republican Party*

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11 *Attorneys for Intervenor-Defendants*
12 *Rise Action Fund, Institute for a*
13 *Progressive Nevada, and Nevada Alliance*
14 *For Retired Americans*

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/s/ Felecia Casci
An Employee of the Carson City
District Attorney's Office

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Attorney for Staci Lindberg

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 STACI LINDBERG'S
JOINDER IN DEFENDANT SECRETARY
OF STATE'S MOTION TO DISMISS**

Defendant, STACI LINDBERG, in her official capacity as the Lyon County Clerk-Treasurer, by
and through counsel, STEPHEN B. RYE, District Attorney of Lyon County, hereby joins the Nevada
Secretary of State's Motion to Dismiss. Defendant STACI LINDBERG 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.

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Office of the District Attorney
Lyon County, Nevada
801 Overland Loop, Suite 201, Dayton, Nevada 89403 · 31 South Main Street, Yerington, Nevada 89447 · 565 East Main Street, Fernley, Nevada 89408

1 Defendant STACI LINDBERG respectfully requests an Order from this Court dismissing
2 Plaintiffs' Complaint for Declaratory and Injunctive Relief.

3 Dated this 19th day of April, 2024.

4 STEPHEN B. RYE
5 Lyon County District Attorney

6 /s/ Stephen B. Rye

7 Stephen B. Rye

8 Bar No. 5761

9 Lyon County District Attorney

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12 (775)4632-6511

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14 srye@lyon-county.org

15 *Attorney for Defendant Staci Lindberg, Lyon County*
16 *Clerk-Treasurer*

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CERTIFICATE OF SERVICE

I certify that I electronically filed the foregoing **DEFENDANT STACI LINDEBRG’S JOINDER IN DEFENDANT SECRETARY OF STATE’S MOTION TO DISMISS** with the Clerk of the Court for the United States District Court by using the court’s CM/ECF system on the 19th day of April, 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 as follows:

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/s/
An employee of the Lyon County
District Attorney’s Office

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1 Katherine F. Parks, Esq.
2 Nevada Bar No. 6227
3 Thorndal Armstrong, PC
4 6590 S. McCarran Blvd., Suite B
5 Reno, Nevada 89509
6 Tel: (775) 786-2882
7 kfp@thorndal.com
8 Attorney for Defendant
9 JIM HINDLE, in his official capacity as clerk for Storey County

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 REPUBLICAN NATIONAL COMMITTEE,
13 NEVADA REPUBLICAN PARTY, and
14 SCOTT JOHNSTON,

15 Plaintiffs,

16 vs.

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

25 Defendants

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

**DEFENDANT JIM HINDLE, in his official
capacity as clerk for Storey County's,
JOINDER IN DEFENDANT SECRETARY
OF STATE'S MOTION TO DISMISS [ECF
26]**

26 COMES NOW Defendant JIM HINDLE, in his official capacity as clerk for Storey
27 County, by and through his attorneys Thorndal Armstrong, PC, and hereby joins in Defendant
28 Secretary of State's Motion to Dismiss [ECF 26] filed on April 15, 2024. Defendant Jim Hindle
hereby incorporates the same arguments and grounds as stated therein as through fully set forth
herein.

DATED this 22nd day of April, 2024.

THORNDAL ARMSTRONG, PC

By: /s/ Katherine Parks

KATHERINE F. PARKS, ESQ.
Nevada Bar No. 6227
6590 S. McCarran Blvd., Suite B
Reno, Nevada 89509
Attorney for Defendant
JIM HINDLE, in his official capacity as
clerk for Storey County

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of Thorndal Armstrong, PC, and that on this date I caused the foregoing DEFENDANT JIM HINDLE, in his official capacity as clerk for Storey County’s, JOINDER IN DEFENDANT SECRETARY OF STATE’S MOTION TO DISMISS [ECF 26] to be served on all parties to this action by:

_____ placing an original or true copy thereof in a sealed, postage prepaid, envelope in the United States mail at Reno, Nevada.

_____ United States District Court CM/ECF system

_____ electronic means (fax, electronic mail, etc.)

_____ Federal Express/UPS or other overnight delivery

fully addressed as follows:

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Aaron D. Ford, Attorney General
Laena St.-Jules, Esq.
Senior Deputy Attorney General
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100 North Carson Street
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Attorneys for Secretary of State

DATED this 22nd day of April, 2024.

/s/ Laura Bautista
An employee of Thorndal Armstrong, PC