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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 REPLY TO
RESPONSE TO [26] MOTION TO
DISMISS [ECF NO. 60]**

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 Reply to Response Motion to Dismiss (ECF No. 60).

Defendant HOEN joins the Reply 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.

Office of the District Attorney
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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 17th day of May, 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

I certify that I electronically filed the foregoing **DEFENDANT WILLIAM “SCOTT” HOEN’S JOINDER IN DEFENDANT SECRETARY OF STATE’S REPLY TO RESPONSE MOTION TO DISMISS [ECF NO. 60]** 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 May, 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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3 Daniel Bravo, Esq.
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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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1 STEVEN B. WOLFSON
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 Attorneys for Defendant
 8 Lorena Portillo

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

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

Case No: 2:24-cv-00518

13 Plaintiff,

14 vs.

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

18 Defendants.

19 **DEFENDANT LORENA PORTILLO'S JOINDER IN DEFENDANT SECRETARY**
 20 **OF STATE'S REPLY IN SUPPORT OF MOTION TO DISMISS**

21 COMES NOW LORENA PORTILLO, in her official capacity as the Registrar of
 22 Voters for Clark County, by and through her attorney, STEVEN B. WOLFSON, District
 23 Attorney, by LISA V. LOGSDON, County Counsel, and hereby joins in Defendant Secretary
 24 of State's Reply in Support of Motion to Dismiss.

25 LORENA PORTILLO joins Defendant Secretary of State's Reply in Support of
 26 Motion to Dismiss in its entirety, thereby adopting the supporting points and authorities filed

27 ///

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1 therein, and respectfully requests an Order from this Court dismissing Plaintiffs' Complaint
2 for Declaratory and Injunctive Relief.

3 DATED this 20th day of May, 2024.

4 STEVEN B. WOLFSON
5 DISTRICT ATTORNEY

6 By: /s/Lisa V. Logsdon
7 LISA V. LOGSDON, COUNTY COUNSEL
8 State Bar No. 011409
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10 5th Floor, Ste. 5075
11 Las Vegas, Nevada 89155-2215
12 Attorney for Defendant
13 Lorena Portillo

14 **CERTIFICATE OF SERVICE**

15 I certify that I am an employee of the Office of the Clark County District Attorney and
16 that on this 20th day of May, 2024, I served a true and correct copy of the foregoing
17 **DEFENDANT LORENA PORTILLO'S JOINDER IN DEFENDANT SECRETARY**
18 **OF STATE'S REPLY IN SUPPORT OF MOTION TO DISMISS** through CM/ECF
19 Electronic Filing system of the United States District Court for the District of Nevada (or, if
20 necessary, by U.S. Mail, first class, postage pre-paid), upon the following:

21 Jeffrey F. Barr, Esq.
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for Retired Americans

8
9
10 /s/ Afeni Banks
An Employee of the Clark County District
Attorney's Office – Civil Division

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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 REPLY IN SUPPORT OF
MOTION TO DISMISS [ECF 60]**

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 Reply in Support of Motion to Dismiss [ECF 60] filed on May 17, 2024.
Defendant Jim Hindle hereby incorporates the same arguments and grounds as stated therein as
through fully set forth herein.

DATED this 20th day of May, 2024.

THORNDAL ARMSTRONG, PC

By: /s/ Katherine Parks

KATHERINE F. PARKS, ESQ.
Nevada Bar No. 6227
6590 S. McCarran Blvd., Suite B
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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 REPLY IN SUPPORT OF MOTION TO DISMISS [ECF 60] 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.

 X 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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3 Benjamin R. Johnson, Esq.
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Official Capacity as Lyon County Clerk-
Treasurer*

6 Mark B. Jackson
7 Douglas County District Attorney
8 Cynthea Gregory
9 Deputy District Attorney
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*Attorneys for Defendant Lorena Portillo Clark
County Registrar of Voters*

14 DATED this 20th day of May, 2024.

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

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13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 REPUBLICAN NATIONAL COMMITTEE,
16 NEVADA REPUBLICAN PARTY, and SCOTT
17 JOHNSTON,

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

18 Plaintiffs,

19 v.

**DEFENDANT DOUGLAS COUNTY
CLERK AMY BURGANS', JOINDER IN
SECRETARY OF STATE'S
REPLY IN SUPPORT OF
MOTION TO DISMISS**

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

27 Defendants

28 Defendant, AMY BURGANS, in her official capacity as Douglas County Clerk, by and through
the Douglas County District Attorney's Office, and Cynthea Gregory, Deputy District Attorney hereby
joins in Defendant Secretary of State's Reply In Support of Motion to Dismiss [ECF 26].

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1 AMY BURGANS, joins Defendant Secretary of State’s Reply In Support of Motion to Dismiss
2 in its entirety, thereby adopting the supporting points and authorities filed therein, and respectfully
3 requests an Order from this court dismissing Plaintiff’s Complaint for Declaratory and Injunctive
4 Relief.

5 DATED this 20th day of May, 2024.

6
7 MARK B. JACKSON
8 Douglas County District Attorney

9 By: /s/ Cynthea Gregory
10 Cynthea Gregory
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Douglas County District Attorney’s Office, and that on this 20th day of May, 2024, the foregoing **DEFENDANT DOUGLAS COUNTY CLERK AMY BURGANS’, JOINDER IN SECRETARY OF STATE’S REPLY IN SUPPORT OF MOTION TO DISMISS** 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

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