

2140  
AARON D. FORD  
Attorney General  
LAENA ST-JULES (Bar No. 15156)  
Senior Deputy Attorney General  
DEVIN A. OLIVER (Bar No. 16773C)  
Deputy Attorney General  
State of Nevada  
Office of the Attorney General  
100 North Carson Street  
Carson City, Nevada 89701-4717  
T: (775) 684-1265  
(775) 684-1234  
E: [lstjules@ag.nv.gov](mailto:lstjules@ag.nv.gov)  
[doliver@ag.nv.gov](mailto:doliver@ag.nv.gov)

*Attorneys for Proposed Intervenor-Respondent  
Secretary of State*

**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
IN AND FOR THE COUNTY OF WASHOE**

CITIZEN OUTREACH FOUNDATION,  
CHARLES MUTH,

Petitioners,

vs.

CARI-ANN BURGESS, in her official  
capacity as Washoe County Interim  
Registrar of Voters,

Respondent.

Case No. CV24-02182

Dept. No. 3

**NEVADA SECRETARY OF STATE'S  
MOTION FOR ORDER SHORTENING TIME**

Pursuant to WDCR 11, Proposed Intervenor-Respondent Francisco V. Aguilar, in his official capacity as Nevada Secretary of State ("Secretary"), by and through counsel, submits this Motion for Order Shortening Time to respond to the Secretary's Motion to Intervene as Respondent. This Motion is made and based upon the declaration of Laena St-Jules, Esq., attached hereto as Exhibit 1, and the papers and pleadings on file in this matter.

1 On Friday, September 23, 2024, Petitioners Citizen Outreach Foundation and  
2 Charles Muth filed their Petition for Writ of Mandamus Pursuant to NRS 293.535 and  
3 NRS 293.530 for Respondents to Notify the Registrant of the Challenge and Follow the  
4 Requirements of NRS 293.530 ("Petition"). Three days later, on September 26, 2024,  
5 counsel for the Secretary emailed counsel for Petitioners and Respondent advising them  
6 that the Secretary would be filing a motion to intervene as respondent as well as a motion  
7 for an order shortening time to respond to the intervention motion. Ex. 1, St-Jules Decl.  
8 ¶ 3. The Secretary is filing his Motion to Intervene as Respondent and the instant motion  
9 only four days after the filing of the Petition.

10 On September 26, 2024, Petitioners filed a Motion for Preliminary Injunction and to  
11 Advance the Trial on the Merits ("Preliminary Injunction Motion"). The Preliminary  
12 Injunction Motion explains that Petitioners will (1) file an *ex parte* motion for order  
13 shortening time, and (2) seek to advance the matter on its merits when a hearing is  
14 schedule on the preliminary injunction. Prelim. Inj. Mot. at 1. Based on the Secretary's  
15 significantly protectable interests in this litigation, as detailed in his Motion to Intervene  
16 as Respondent, there is an urgent need for a decision on the Secretary's proposed  
17 intervention. Ex. 1, St-Jules Decl. ¶¶ 5, 7. The Secretary seeks to participate fully in all  
18 stages of this litigation, and timely intervention is necessary to allow the Secretary to  
19 participate in resolution of the Preliminary Injunction Motion and protect the Secretary's  
20 interests. *Id.*

21 Accordingly, good cause exists to shorten the time for resolving the Secretary's  
22 Motion to Intervene as Respondent.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

DATED this 27th day of September 2024.

/s/ Laena St-Jules  
LAENA ST-JULES (Bar No. 15156)  
Senior Deputy Attorney General  
DEVIN A. OLIVER (Bar No. 16773C)  
Deputy Attorney General  
State of Nevada  
Office of the Attorney General  
100 North Carson Street  
Carson City, Nevada 89701-4717  
T: (775) 684-1265  
(775) 684-1234  
E: [lstjules@ag.nv.gov](mailto:lstjules@ag.nv.gov)  
[doliver@ag.nv.gov](mailto:doliver@ag.nv.gov)

*Attorneys for Proposed  
Intervenor-Respondent Secretary of State*



1 **INDEX OF EXHIBITS**

2

3

EXHIBIT No.	EXHIBIT DESCRIPTION	NUMBER OF PAGES
1.	Declaration of Laena St-Jules, Esq.	2

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28