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9 *Attorneys for Proposed Intervenor-Respondents,*
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and the Nevada Alliance for Retired
11 *Americans*

12 **IN THE FIRST JUDICIAL DISTRICT COURT**
13 **OF THE STATE OF NEVADA IN AND FOR CARSON CITY**
14

15 MARGARET M. OSBORNE,
individually,

16 Petitioners,

17 vs.

18 SCOTT HOEN, in his official capacity
19 as the Carson City Clerk, and JASON
WOODBURY in his official capacity as
20 the Carson City District Attorney,

21 Respondents,
22

Case No. 24 EW 00025 1B

Dept. No.: II

23
24 **MOTION FOR ORDER SHORTENING TIME**

25 On or about October 23, 2024, Proposed Intervenor-Respondents RISE,
26 Institute for a Progressive Nevada, and the Nevada Alliance for Retired Americans
27 ("Proposed Intervenor") filed a motion to intervene of right, pursuant to NRCP
28 24(a)(1). Here, the Proposed Intervenor move the Court for an order shortening the

1 time in which to consider the intervention motion. The declaration of Daniel Bravo,
2 Esq. herein and the included proposed order shortening time support this motion.

3 Petitioners seek a Writ of Mandamus from this Court to upend Nevada's
4 established voter-challenge rules by requiring Respondents to process voter
5 challenges in Carson City. On October 22, 2024, this Court ordered the Clerks to
6 respond to the Writ of Mandamus on or before October 24, 2024. Given the
7 compressed briefing schedule, as well as the subject matter and prayer for relief
8 contained in the Writ of Mandamus, the need for expedited treatment of the
9 intervention motion is manifest.

10 **AFFIRMATION**

11 The undersigned hereby affirm that the foregoing document does not contain
12 the social security number of any person.

13 DATED this 23rd day of October, 2024.

14 **BRAVO SCHRAGER LLP**

15
16 By: 

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26 *the Nevada Alliance for Retired Americans*
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1 **DECLARATION OF DANIEL BRAVO IN SUPPORT OF MOTION**
2 **TO INTERVENE ON ORDER SHORTENING TIME**

3 I, Daniel Bravo, declare as follows:

4 1. I am duly admitted to practice law in the state of Nevada and am a
5 partner with the law firm Bravo Schrager LLP, counsel for Proposed Intervenor-
6 Respondents RISE, Institute for a Progressive Nevada, and the Nevada Alliance for
7 Retired Americans ("Proposed Intervenors").

8 2. I make this Declaration of personal, firsthand knowledge and, if called
9 and sworn as a witness, I could and would testify competently thereto. I have personal
10 knowledge of the facts stated herein.

11 3. I make this Declaration in support of Proposed Intervenors' Motion for
12 Order Shortening Time for the Court to consider Proposed Intervenors' Motion to
13 Intervene (the "Motion to Intervene").

14 4. Pursuant to 1st Judicial District Rule 3.7(b), I conferred with counsel to
15 Petitioners and Respondents on October 22, 2024, by email. Petitioners object to
16 intervention. Respondent Hoen and Woodbury did not object to intervention.

17 5. On or about October 23, 2024, Proposed Intervenors filed a Motion to
18 Intervene, pursuant to NRCP 24(a)(1).

19 6. Shortening time for the Court to adjudicate the Motion to Intervene is
20 appropriate. The Court's typical practice would result in the Motion to Intervene
21 being adjudicated within 30–45 days of its filing (i.e., in late-November to mid-
22 December 2024). This would leave Motion to Intervene with no time to intervene as
23 a defendant in the above-titled action and oppose Petitioners' Writ of Mandamus.

24 7. Petitioners seek a Writ of Mandamus from this Court to compel the
25 Carson City Clerk to to process voter challenges in Carson City.

26 8. On October 22, 2024, this Court ordered the Respondents to respond to
27 the Writ of Mandamus on or before October 24, 2024.

28 9. Considering the foregoing, good cause exists to hear the Motion to

1 Intervene on shortened time, and no prejudice arises from requiring the Motion to
2 Intervene to be considered on shortened time.

3 I declare under penalty of perjury that the foregoing is true and correct to the
4 best of my knowledge.

5 Executed this 23rd day of October, 2024.

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7 Bv:



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DANIEL BRAVO (SBN 13078)

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 23rd day of October, 2024, a true and correct copy
3 of the foregoing MOTION FOR ORDER SHORTENING TIME was served via
4 U.S.P.S. Mail, postage pre-paid Las Vegas, Nevada and via electronic mail as follows:

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11 Billie Shadron, Judicial Assistant to
12 Hon. Kristin Luis
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14 BShadron@carson.org

15 By: *Dannielle Fresquez*
16 Dannielle Fresquez, an Employee of
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