

1 Jeffrey F. Barr (Bar # 7269)
Ashcraft & Barr LLP
2 9205 West Russell Road, Suite 240
Las Vegas, NV 89148
3 702-631-4755
barrj@ashcraftbarr.com

4 Michael Francisco* (CO Atty. No. 39111)
5 Christopher O. Murray* (CO. Atty No. 39340)
First & Fourteenth PLLC
6 800 Connecticut Avenue NW, Suite 300
Washington, D.C. 20006
7 202-998-1978
michael@first-fourteenth.com
8 chris@first-fourteenth.com

9 Sigal Chattah (Bar # 8264)
5875 S. Rainbow Blvd #204
10 Las Vegas, NV 89118
702-360-6200
11 sigal@thegoodlawyerlv.com

12 David A. Warrington* (VA Bar No. 72293)
Gary M. Lawkowski* (VA Bar No. 82329)
13 2121 Eisenhower Ave, Suite 608
Alexandria, VA 22314
14 703-574-1206
DWarrington@dhillonlaw.com
15 GLawkowski@dhillonlaw.com

* *Pro hac vice application granted or forthcoming*

16 **IN THE FIRST JUDICIAL DISTRICT COURT**
17 **OF THE STATE OF NEVADA IN AND FOR CARSON CITY**

18 **REPUBLICAN NATIONAL**
19 **COMMITTEE; et al.**
20 **Plaintiffs,**

21 **v.**

22 **FRANCISCO AGUILAR, in his official**
23 **capacity as Nevada Secretary of State;**
State of NEVADA; et al.
24 **Defendants,**

25 **and**

26 **VET VOICE FOUNDATION; and the**
NEVADA ALLIANCE FOR RETIRED
AMERICANS,
27 **Intervenor-Defendants.**

Case No.: 24 OC 00101 1B

Dept. No.: 1

CASE APPEAL STATEMENT

1 NEVADA REPUBLICAN PARTY
2 **CASE APPEAL STATEMENT**

3 1. Name of Appellants filing this case appeal statement:
4 **REPUBLICAN NATIONAL COMMITTEE;**
5 **NEVADA REPUBLICAN PARTY;**
6 **DONALD J. TRUMP FOR PRESIDENT 2024, INC.;**
7 **SCOTT JOHNSTON**

8 2. Identify the judge issuing the decision, judgment, or order appealed
9 from: **Honorable James Russell, District Court Judge , Dept. 1.**

10 3. Identify each appellant and the name and address of counsel for each
11 appellant:

12 **REPUBLICAN NATIONAL COMMITTEE** is represented by the following:

13 **Jeffrey F. Barr, Esq.**
14 **ASHCRAFT & BARR LLP**
15 **9205 West Russell Road, Suite 240**
16 **Las Vegas, Nevada 89148**

17 **Michael Francisco***
18 **Christopher O. Murray***
19 **First & Fourteenth PLLC**
20 **800 Connecticut Avenue NW, Suite 300**
21 **Washington, D.C. 20006**

22 **Pro hac vice order pending*

23 **DONALD J. TRUMP FOR PRESIDENT 2024, INC.**

24 **Jeffrey F. Barr, Esq.**
25 **ASHCRAFT & BARR LLP**
26 **9205 West Russell Road, Suite 240**
27 **Las Vegas, Nevada 89148**

28 **David A. Warrington***
29 **Gary M. Lawkowski***
30 **Dhillon Law**
31 **2121 Eisenhower Ave, Suite 608**
32 **Alexandria, VA 22314**

33 ** Pro hac vice application forthcoming*

34 *///*

35 *///*

1 **NEVADA REPUBLICAN PARTY** is represented by the following:

2 Sigal Chattah, Esq.
3 5875 S. Rainbow Blvd #204
4 Las Vegas, NV 89118

4 **SCOTT JOHNSTON** is represented by the following:

5 Jeffrey F. Barr, Esq.
6 ASHCRAFT & BARR LLP
7 9205 West Russell Road, Suite 240
8 Las Vegas, Nevada 89148

9 Michael Francisco*
10 Christopher O. Murray*
11 First & Fourteenth PLLC
12 800 Connecticut Avenue NW, Suite 300
13 Washington, D.C. 20006

14 *Pro hac vice order pending

15 4. Identify each respondent and the name and address of appellate counsel,
16 if known, for each respondent:

17 **FRANCISCO AGUILAR** is represented by the following:

18 Aaron Ford, Attorney General
19 Laena St. Jules, Deputy Attorney General
20 100 North Carson Street
21 Carson City, NV 89701

22 **STATE OF NEVADA** is represented by the following:

23 Aaron Ford, Attorney General
24 Laena St. Jules, Deputy Attorney General
25 100 North Carson Street
26 Carson City, NV 89701

27 **LORENA PORTILLO AND LYNN MARIE GOYA** are represented by the
following:

28 Lisa Logsdon, County Counsel
29 Clark County District Attorney's Office
30 500 South Grand Central Parkway, #5075
31 Las Vegas, NV 89155

32 ///

33 ///

1 **CARI-ANN BURGESS AND JAN GALASSINI** are represented by the
2 following:

3 Elizabeth Hickman
4 Washoe County District Attorney's Office
5 One South Sierra Street
6 Reno, NV 89501

7 **VET VOICE FOUNDATION AND NEVADA ALLIANCE FOR RETIRED**
8 **AMERICANS** are represented by the following:

9 Bradley Schrager, Esq.
10 Daniel Bravo, Esq.
11 Bravo Schrager LLP
12 6675 South Tenaya Way, Suite 200
13 Las Vegas, NV 89113

14 Daniel Fox*
15 Richard Medina*
16 Marcos Mocine-McQueen*
17 Elias Law Group LLP
18 250 Massachusetts Ave NW Suite 400
19 Washington DC 20001

20 *Admitted *pro hac vice*

21 5. Indicate whether any attorney identified above in response to question
22 3 or 4 is not licensed to practice law in Nevada and, if so, whether the district court
23 granted that attorney permission to appear under SCR 42:

24 ***Appellants***

25 Michael Francisco and Christopher O. Murray are not licensed to practice in
26 Nevada. The Orders admitting them to practice are pending in the District Court,
27 and Appellants will supplement this Case Appeal Statement with said Orders.

28 David A. Warrington and Gary M. Lawkowski are not licensed to practice in
29 Nevada. Their Applications to practice before this Court will be forthcoming.

30 ***Respondents***

31 Daniel Fox, Richard Medina, and Marcos Mocine-McQueen are not licensed to
32 practice in Nevada. The Orders admitting them to practice are attached as
33 Exhibit 1.

34 6. Indicate whether appellant was represented by appointed or retained
35 counsel in the district court:

36 All Appellants were represented by retained counsel in the district court.

1 7. Indicate whether appellant is represented by appointed or retained
counsel on appeal:

2 All Appellants are represented by retained counsel on appeal.

3 8. Indicate whether appellant was granted leave to proceed in forma
4 pauperis, and the date of entry of the district order granting such leave:

5 None of Appellants were granted leave to proceed in forma pauperis.

6 9. Indicate the date the proceedings commenced in the district court:

7 On or about June 3, 2024.

8 10. Provide a brief description of the nature of the action and result in
district court, including the type of judgment or order being appealed and the
9 relief granted by the district court:

10 This is a case of statutory interpretation of NRS 293.269921 and case under
the Nevada Administrative Procedure Act, specifically whether election officials
11 may count non-postmarked mail ballots received after Election Day. Appellants
12 appeal the order of the district court denying their Motion for Preliminary
Injunction.

13 11. Indicate whether the case has previously been the subject of an appeal
to or original writ proceeding in the Supreme Court and, if so, the caption and
14 Supreme Court docket number of the prior proceeding:

15 This case has not previously been the subject of an appeal to or original writ
proceeding in the Supreme Court.

16 12. Indicate whether this appeal involves child custody or visitation:

17 This appeal does not involve child custody or visitation.

18 13. If this is a civil case, indicate whether this appeal involves the possibility
19 of settlement:

20 This appeal likely does not involve the possibility of settlement.

21 ///

22 ///

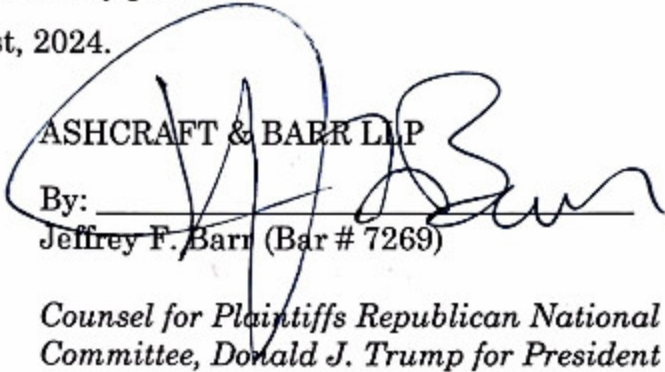
23 ///

1 **AFFIRMATION**

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

4 DATED this 8th day of August, 2024.

5 **ASHCRAFT & BAER LLP**

6 By: 
7 Jeffrey F. Barr (Bar # 7269)

8 *Counsel for Plaintiffs Republican National
9 Committee, Donald J. Trump for President
2024, Inc., and Scott Johnston*

10 **FIRST & FOURTEENTH PLLC**

11 By: _____
12 Michael Francisco
13 Christopher O. Murray

14 *Counsel for Plaintiffs Republican National
15 Committee and Scott Johnston*

16 **CHATTAH LAW GROUP**

17 By: _____
18 Sigal Chattah (Bar # 8264)

19 *Counsel for Plaintiff Nevada Republican
20 Party*

21 **DHILLON LAW GROUP**

22 By: _____
23 David A. Warrington* (pro hac vice
24 forthcoming)
25 Gary M. Lawkowski* (pro hac vice
26 forthcoming)

27 *Attorneys for Plaintiff Donald J. Trump for
President 2024, Inc.*

1
2 **CERTIFICATE OF SERVICE**

3 I hereby certify that on the 8th day of August 2024, I served a true and correct
4 copy of the foregoing CASE APPEAL STATEMENT by electronic mail to the e-
5 mail addresses listed below:

6 • LStJules@ag.nv.gov	Attorneys for Defendant Francisco Aguilar
7 • lisa.logsdon@clarkcountydav.gov 8 • Afeni.Banks@ClarkCountyDANV.gov	Attorneys for Defendants Lorena Portillo and Lynn Marie Goya
9 • ehickman@da.washoecounty.gov	Attorneys for Cari-Ann Burgess and Jan Galassini
11 • daniel@bravoschrager.com 12 • dfox@elias.law 13 • rmedina@elias.law 14 • mmcqueen@elias.law 15 • bradley@bravoschrager.com	Attorneys for Intervenor Defendants Vet Voice Foundation and Nevada Alliance for Retired Americans


16 
17 An Employee of Ashcraft & Barr | LLP

EXHIBIT 1

JUL - 9 2014

RECEIVED

1 DANIEL BRAVO, Esq.
2 BRAVO SCHRAGER LLP
3 60 South Tower Way Suite 200
4 Las Vegas, Nevada 89113
5 Tel: 702 895-1774
6 Email: daniel.bravo@bravoschragers.com
7 Email: dan@bravoschragers.com

8 DAVID R. POY OFF Bar No. 16036
9 RICHARD A. MERRILL (Attorney for Intervenor)
10 MARIUS M. ... (Attorney for Intervenor)
11 WILLAS LAW GROUP LLP
12 5314 American Express Ave NW, Suite 400
13 Washington, DC 20001
14 Tel: (202) 537-4497
15 Fax: (202) 537-4497
16 Email: rmm@willaslaw.com
17 Email: mm@willaslaw.com

18 Attorneys for Intervenor-Defendants,
19 for their clients and the Nevada
20 Alliance for General Americans

IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA IN AND FOR CARSON CITY

21 REPUBLICAN NATIONAL
22 COMMITTEE, et al.
23 BY: REPUBLICAN PARTY OF NEVADA, et al.,
24 THOMAS DONALD J. ...
25 SCOTT JOHNSTON, et al.,

Case No. 24 OC 00101 1B
Dept. No. 1

INTERVENOR-DEFENDANTS
REQUESTING ORDER ADMITTING
TO PRACTICE

vs.

26 FRANCISCO AGUILAR, in his official
27 capacity as Nevada Secretary of State,
28 Clerk ABON BUSCH, in her official
29 capacity as the Washoe County
30 Clerk, and ...
31 ...
32 ...
33 ...
34 ...
35 ...
36 ...
37 ...
38 ...

EXHIBIT 1

BRAVO SCHRAGER LLP

RETRIEVED FROM DEMOCRACYDOCKET.COM

1 BRADLEY S. SCHRAGER, ESQ. (SBN 10217)
DANIEL BRAVO, ESQ. (SBN 13078)
2 BRAVO SCHRAGER LLP
6675 South Tenaya Way, Suite 200
3 Las Vegas, Nevada 89113
Tele.: (702) 996-1724
4 Email: bradley@bravoschrager.com
Email: daniel@bravoschrager.com

5 DAVID R. FOX (NV Bar No. 16536)
6 RICHARD A. MEDINA (*pro hac vice* forthcoming)
MARCOS MOCINE-MCQUEEN (*pro hac vice* forthcoming)
7 ELIAS LAW GROUP LLP
250 Massachusetts Ave NW, Suite 400
8 Washington, DC 20001
Tel: (202) 968-4490
9 Email: dfox@elias.law
Email: rmedina@elias.law
10 Email: mmcqueen@elias.law

11 *Attorneys for Intervenor-Defendants,*
12 *Vet Voice Foundation and the Nevada*
Alliance for Retired Americans

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

16 REPUBLICAN NATIONAL
17 COMMITTEE; NEVADA
18 REPUBLICAN PARTY; DONALD J.
TRUMP FOR PRESIDENT 2024, INC;
19 SCOTT JOHNSTON,

20 Plaintiffs,

21 vs.

22 FRANCISCO AGUILAR, in his official
capacity as Nevada Secretary of State;
23 CARI-ANN BURGESS, in her official
capacity as the Washoe County
Registrar of Voters; JAN GALASSINI,
24 in her official capacity as the Washoe
County Clerk; LORENA PORTILLO, in
25 her official capacity as the Clark
County Registrar of Voters; LYNN
26 MARIE GOYA, in her official capacity
as the Clark County Clerk,

27 Defendants,
28

REC'D & FILED
2024 JUL -8 AM 10:06
ALLIANT COSTY REE
CLERK
BY: [Signature]

Case No. 24 OC 00101 1B

Dept. No.: I

INTERVENOR-DEFENDANTS'
[PROPOSED] ORDER ADMITTING
TO PRACTICE

1 and

2 VET VOICE FOUNDATION; and the
3 NEVADA ALLIANCE FOR RETIRED
4 AMERICANS.

5 Intervenor-Defendants.


6 Marcos M. McQueen, Esq. having filed his Motion to Associate Counsel under
7 Nevada Supreme Court Rule 42, together with a Verified Application for Association
8 of Counsel, Certificate of Good Standing for the District of Columbia, and the State
9 Bar of Nevada Statement; said application having been noticed, no objections having
10 been made, and the Court being fully apprised in the premises, and good cause
11 appearing,

12 IT IS HEREBY ORDERED, that said application is hereby granted, and
13 Marcos M. McQueen, Esq. is hereby admitted to practice in the above-entitled Court
14 for the purposes of the above-entitled matter only.

15 DATED this 8th day of July, 2024.

16
17 

18 Submitted by:

19 
20 **Bradley S. Schrager, Esq. (SBN 10217)**
21 **Daniel Bravo, Esq. (SBN 13078)**
22 **BRAVO SCHRAGER LLP**
23 6675 South Tenaya Way, Suite 200
24 Las Vegas, Nevada 89113

25 **DAVID R. FOX (NV Bar No. 16536)**
26 **RICHARD A. MEDINA**
27 *(pro hac vice forthcoming)*
28 **MARCOS MOCINE-MCQUEEN**
(pro hac vice forthcoming)
ELIAS LAW GROUP LLP
250 Massachusetts Ave NW, Suite 400
Washington, DC 20001

Attorneys for Intervenor-Defendants,
Vet Voice Foundation and the Nevada
Alliance for Retired Americans

BRAVO SCHRAGER LLP

1 BRADLEY S. SCHRAGER, ESQ. (SBN 10217)
2 DANIEL BRAVO, ESQ. (SBN 13078)
3 BRAVO SCHRAGER LLP
4 6675 South Tenaya Way, Suite 200
5 Las Vegas, Nevada 89113
6 Tele.: (702) 996-1724
7 Email: bradley@bravoschrager.com
8 Email: daniel@bravoschrager.com

9 DAVID R. FOX (NV Bar No. 16536)
10 RICHARD A. MEDINA (*pro hac vice* forthcoming)
11 MARCOS MOCINE-MCQUEEN (*pro hac vice* forthcoming)
12 ELIAS LAW GROUP LLP
13 250 Massachusetts Ave NW, Suite 400
14 Washington, DC 20001
15 Tel: (202) 968-4490
16 Email: dfox@elias.law
17 Email: rmedina@elias.law
18 Email: mmcqueen@elias.law

19 *Attorneys for Intervenor-Defendants,*
20 *Vet Voice Foundation and the Nevada*
21 *Alliance for Retired Americans*

22
23
24
25
26
27
28
IN THE FIRST JUDICIAL DISTRICT COURT
OF THE STATE OF NEVADA IN AND FOR CARSON CITY

REPUBLICAN NATIONAL
COMMITTEE; NEVADA
REPUBLICAN PARTY; DONALD J.
TRUMP FOR PRESIDENT 2024, INC;
SCOTT JOHNSTON,

Plaintiffs,

vs.

FRANCISCO AGUILAR, in his official
capacity as Nevada Secretary of State;
CARI-ANN BURGESS, in her official
capacity as the Washoe County
Registrar of Voters; JAN GALASSINI,
in her official capacity as the Washoe
County Clerk; LORENA PORTILLO, in
her official capacity as the Clark
County Registrar of Voters; LYNN
MARIE GOYA, in her official capacity
as the Clark County Clerk,

Defendants,

REC'D
JUL -8 AM 10:30
WILLIAM SCOTT
BY HARKLEROAD

Case No. 24 OC 00101 1B

Dept. No.: I

INTERVENOR-DEFENDANTS'
[PROPOSED] ORDER ADMITTING
TO PRACTICE

1 and

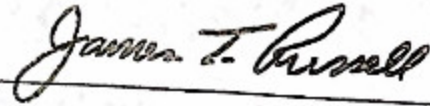
2 VET VOICE FOUNDATION; and the
3 NEVADA ALLIANCE FOR RETIRED
4 AMERICANS,

5 Intervenor-Defendants.

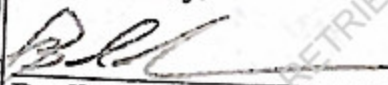
6 Richard A. Medina, Esq. having filed his Motion to Associate Counsel under
7 Nevada Supreme Court Rule 42, together with a Verified Application for Association
8 of Counsel, Certificates of Good Standing for the District of Columbia and New York,
9 and the State Bar of Nevada Statement; said application having been noticed, no
10 objections having been made, and the Court being fully apprised in the premises, and
11 good cause appearing,

12 IT IS HEREBY ORDERED, that said application is hereby granted, and
13 Richard A. Medina, Esq. is hereby admitted to practice in the above-entitled Court
14 for the purposes of the above-entitled matter only.

15 DATED this 8th day of July, 2024.

16
17 

18 Submitted by:

19 
20 Bradley S. Schrage, Esq. (SBN 10217)
21 Daniel Bravo, Esq. (SBN 13078)
22 BRAVO SCHRAGER LLP
23 6675 South Tenaya Way, Suite 200
24 Las Vegas, Nevada 89113

25 DAVID R. FOX (NV Bar No. 16536)
26 RICHARD A. MEDINA
27 (pro hac vice forthcoming)
28 MARCOS MOCINE-MCQUEEN
(pro hac vice forthcoming)
ELIAS LAW GROUP LLP
250 Massachusetts Ave NW, Suite 400
Washington, DC 20001

Attorneys for Intervenor Defendants,
Vet Voice Foundation and the Nevada
Alliance for Retired Americans