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Tracie K. Lindeman
Clerk of Supreme Court

*Attorneys for proposed
Amici Curiae*

IN THE SUPREME COURT OF THE STATE OF NEVADA

FORD MOTOR COMPANY,

Appellant,

Supreme Court No. 67843

District Court No. A-11-641059-C

vs.

THERESA GARCIA TREJO AS
SUCCESSOR-IN-INTEREST AND
SURVIVING SPOUSE OF RAFAEL
TREJO, DECEASED,

Respondent.

MOTION TO ADMIT VICTOR E. SCHWARTZ PRO HAC VICE

Pursuant to Rule 42 of the Nevada Supreme Court Rules, I respectfully request that this Court allow Victor E. Schwartz to appear of record in the above-captioned case and participate *pro hac vice* (for this case only) on behalf of *Amici Curiae* National Association of Manufacturers and Alliance of Automobile Manufacturers, Inc. In support of this motion, I have attached

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1 the Verified Application for *pro hac vice* admission for Mr. Schwartz (Exhibit
2 A), certificates of good standing from the jurisdictions in which he is barred
3 (Exhibit B), and a statement of the State Bar of Nevada (Exhibit C).

4 DATED this 1st day of December, 2015.

5 BAILEY ♦ KENNEDY

6
7 By: /s/ Dennis L. Kennedy
8 DENNIS L. KENNEDY
9 SARAH E. HARMON

10 *Attorneys for proposed Amici Curiae*
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CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ♦ KENNEDY and that on the 1st day of December, 2015, service of the foregoing Motion to Admit Victor E. Schwartz Pro Hac Vice was made by electronic service through the Nevada Supreme Court's electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known addresses:

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MORGAN T. PETRELLI
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Email: vcrawford@swlaw.com
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Attorneys for Respondent
THERESA GARCIA TREJO

/s/ Jennifer Kennedy
Employee of BAILEY❖KENNEDY

EXHIBIT A

EXHIBIT A

DENNIS L. KENNEDY
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IN THE SUPREME COURT OF THE STATE OF NEVADA

FORD MOTOR COMPANY,

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vs.

THERESA GARCIA TREJO AS
SUCCESSOR-IN-INTEREST AND
SURVIVING SPOUSE OF RAFAEL
TREJO, DECEASED,

Respondent.

Supreme Court No. 67843

District Court No. A-11-641059-C

**VERIFIED APPLICATION FOR ASSOCIATION OF COUNSEL
UNDER NEVADA SUPREME COURT RULE 42**

VICTOR ELLIOT SCHWARTZ, Petitioner, respectfully represents:

1. Petitioner resides at 307 Yoakum Parkway, Apt. 1823, Alexandria, VA 22304; telephone: (703) 819-7774.

2. Petitioner is an attorney at law and a member of the law firm of: Shook, Hardy & Bacon L.L.P. with offices at 1155 F Street, NW, Suite 200, Washington, D.C., 20004; telephone: (202) 783-8400; email:

vschwartz@shb.com.

3. Petitioner has been retained personally or as a member of the above named law firm by the National Association of Manufacturers and Alliance of Automobile Manufacturers, Inc. to provide legal representation in connection with the above-entitled matter now pending before the above referenced court.

4. Since the stated dates of admission, petitioner has been, and presently is, a member of good standing of the bar of the highest court of the State of New York (admitted: 12/15/1965), Ohio (admitted: 5/13/1974) and the District of Columbia (admitted: 12/29/1986) where petitioner regularly practices law.

5. Petitioner was admitted to practice before the following United States District Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States, and/or courts of other states on the dates indicated for each, and is presently a member in good standing of the bars of said Courts:

DATE ADMITTED

U.S. District Court for the District of Columbia	5/1/1993
U.S. Court of Appeals for the District of Columbia	9/30/1987
U.S. Court of Appeals for the Second Circuit	12/13/1965
U.S. Court of Appeals for the Fifth Circuit	7/20/1999
U.S. Court of Appeals for the Sixth Circuit	2/22/1968
Supreme Court of the United States of America	1/1/11/1993

6. Is Petitioner currently suspended or disbarred in any court? You must answer yes or no. If yes, give particulars; e.g., court, jurisdiction, date: No.

7. Is Petitioner currently subject to any disciplinary proceedings by any organization with authority at law? You must answer yes or no. If yes, give

1 particulars, e.g. court, discipline authority, date, status: No.

2 8. Has Petitioner ever received public discipline including, but not limited
3 to, suspension or disbarment, by any organization with authority to discipline
4 attorneys at law? You must answer yes or no. If yes, give particulars, e.g. court,
5 discipline authority, date, status: No.

7 9. Has Petitioner ever had any certificate or privilege to appear and practice
8 before any regulatory administrative body suspended or revoked? You must
9 answer yes or no. If yes, give particulars, e.g. date, administrative body, date of
10 suspension or reinstatement: No.

11 10. Has Petitioner, either by resignation, withdrawal, or otherwise, ever
12 terminated or attempted to terminate Petitioner's office as an attorney in order
13 to avoid administrative, disciplinary, disbarment, or suspension proceedings?
14 You must answer yes or no. If yes, give particulars: No.

16 11. Petitioner has filed the following application(s) to appear as counsel
17 under Nevada Supreme Court Rule 42 during the past three (3) years in the
18 following matters, if none, indicate so: *(do not include Federal Pro Hacs)*

19 Date of Application: August 6, 2014

20 Cause: *Wyeth v. Eighth Jud. Dist. Court*, No. 66155

21 Title of Court, Administrative Body or Arbitrator : Nevada Supreme Court

22 Was Application Granted or Denied: Granted

23
24 12. Nevada Counsel of Record for Petition in this matter is: Dennis L.

Kennedy (Nevada Bar No. 1462), Bailey Kennedy LLP, 8984 Spanish Ridge Avenue, Las Vegas, NV 89148; telephone: (702) 562-8820.

13. The following accurately represents the names and addresses of each party in this matter, WHETHER OR NOT REPRESENTED BY COUNSEL, and the names and addresses of each counsel of record who appeared for said parties: (You may attach as an Exhibit if necessary.)

NAME	MAILING ADDRESS
Lisa Perrochet Emily V. Cuatto <i>Attorneys for Appellant</i>	HORVITZ & LEVY, L.L.P. 15760 Ventura Boulevard, 18th Floor Encino, CA 91436
Michael W. Eady <i>Attorneys for Appellant</i>	THOMPSON, COE, COUSINS & IRONS, L.L.P. 701 Brazos, Suite 1500 Austin, TX 78701
Ricardo Garcia Jody Mask <i>Attorneys for Respondent</i>	GARCIA, OHOA MASK 820 South Main Street McAllen, TX 78501
William R. Killip, Jr. Brian D. Nettles <i>Attorneys for Respondent</i>	NETTLES LAW FIRM 1389 Galleria Drive, Suite 200 Henderson, NV 89014
Larry Lawrence <i>Attorney for Respondent</i>	LAWRENCE LAW FIRM 3112 Windsor Road, Suite A234 Austin, TX 78703
A. William Maupin <i>Attorney for Respondent</i>	NAYLOR & BRASTER 1050 Indigo Drive, Suite 112 Las Vegas, NV 89145
Beau Sterling <i>Attorney for Respondent</i>	STERLING LAW, LLC 228 South 4th Street, 1st Floor Las Vegas, NV 89101
David N. Frederick, Esq. <i>Attorney for Respondent</i>	43 Innisbrook Avenue Las Vegas, NV 89113

1 14. Petitioner agrees to comply with the provisions of Nevada Supreme
2 Court Rule 42(3) and (13) and Petitioner consents to the jurisdiction of the
3 courts and disciplinary boards of the State of Nevada in accordance with
4 provisions as set forth in SCR 42(3) and (13). Petitioner respectfully requests
5 that Petitioner be admitted to practice in the above-entitled court FOR THE
6 PURPOSES OF THIS MATTER ONLY.
7

8 15. Petitioner has disclosed in writing to the client that the applicant is not
9 admitted to practice in this jurisdiction and that the client has consented to such
10 representation.
11

12 I, Victor E. Schwartz, do hereby swear/affirm under penalty of perjury
13 that the assertions of this application are true:

14 That I am the Petitioner in the above entitled matter; that I have read the
15 foregoing and know the contents thereof; that the same is true of my own
16 knowledge except as to those matters therein stated on information and belief,
17 and as to the matter I believe them to be true.
18

19 That I further certify that I am subject to the jurisdiction of the Courts and
20 disciplinary boards of this state with respect to the law of this state governing
21 the conduct of attorneys to the same extent as a member of the State Bar of
22 Nevada; that I understand and shall comply with the standards of professional
23 conduct required by members of the State Bar of Nevada; and that I am subject
24

1 to the disciplinary jurisdiction to the State Bar of Nevada with respect to any of
2 my actions occurring in the course of such appearance.

3 DATED this 24 day of November, 2015

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8 Victor E. Schwartz
SHOOK, HARDY & BACON L.L.P.
1155 F Street NW, Suite 200
Washington, DC 20004
(202) 783-8400

9 STATE OF DISTRICT OF COLUMBIA)
10 COUNTY OF WASHINGTON DC) ss

11 Subscribed and sworn to before me
12 this 24 day of NOVEMBER, 2015

13 Alan Robert Starnier
Notary Public

14 ALAN ROBERT STARNER
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires January 14, 2018

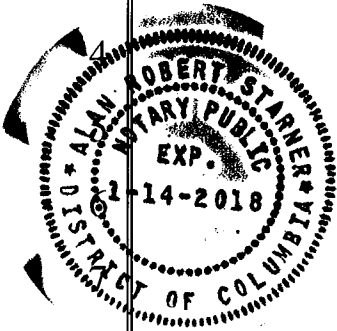
15 I, Dennis L. Kennedy, hereby consent as Nevada Counsel of Record to
16 the designation of Petitioner to associate in this cause pursuant to SCR 42.

17 DATED this 25TH day of November, 2015.

18 BAILEY ♦ KENNEDY

19
20 By: [Signature]
21 DENNIS L. KENNEDY
22 SARAH E. HARMON

23 *Attorneys for proposed Amici Curiae*



1 STATE OF Nevada)
2) ss
COUNTY OF Clark)

3 Subscribed and sworn to before me

4 this 25th day of November, 2015

5 Jennifer J. Kennedy
6 Notary Public

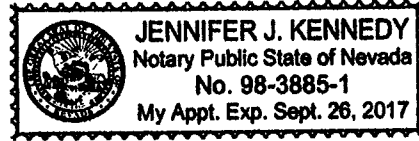


EXHIBIT B

EXHIBIT B

Appellate Division of the Supreme Court
of the State of New York
First Judicial Department

I, Susanna Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

VICTOR ELLIOT SCHWARTZ

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on **December 13, 1965**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my
hand and affixed the seal of this court on

November 18, 2015



Clerk of the Court

The Supreme Court of Ohio

C E R T I F I C A T E

I, SUSAN B. CHRISTOFF, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

Victor Elliot Schwartz

was admitted to the practice of law in Ohio on May 13, 1974; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 17th day of November, 2015.

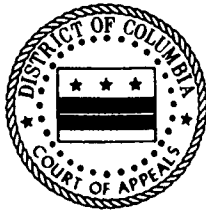
SUSAN B. CHRISTOFF

Director, Attorney Services Division

A handwritten signature in cursive script, reading "Tammy White", written over a horizontal line.

Tammy White

Attorney Services Manager



District of Columbia Court of Appeals
Committee on Admissions
430 F Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

*I, JULIO A. CASTILLO, Clerk of the District of Columbia Court
of Appeals, do hereby certify that*

VICTOR E. SCHWARTZ

*was on DECEMBER 29, 1986 duly qualified and admitted as an
attorney and counselor entitled to practice before this Court and is,
on the date indicated below, an active member in good standing of
this Bar.*

*In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this Court
at the City of Washington, D.C.,
on NOVEMBER 12, 2015.*

JULIO A. CASTILLO
Clerk of the Court

By: *Monette Lane*
Deputy Clerk

EXHIBIT C

EXHIBIT C

1 STAT

2 IN THE SUPREME COURT OF THE STATE OF NEVADA

3 Case No. 67843

4
5 Ford Motor Company

6 vs.

7 Theresa Garcia Trejo
8
9 _____/

10 STATE BAR OF NEVADA STATEMENT PURSUANT TO SUPREME COURT RULE
11 42 (3) (b)

12 THE STATE BAR OF NEVADA, in response to the application of
13 Petitioner, submits the following statement pursuant to SCR42(3):

14 SCR42(6)**Discretion.** The granting or denial of a motion to associate
15 counsel pursuant to this rule by the court is discretionary. The
16 court, arbitrator, mediator, or administrative or governmental
17 hearing officer may revoke the authority of the person permitted to
18 appear under this rule. Absent special circumstances, repeated
19 appearances by any person or firm of attorneys pursuant to this rule
20 shall be cause for denial of the motion to associate such person.

21 (a) **Limitation.** It shall be presumed, absent special
22 circumstances, and only upon showing of good cause, that
23 more than 5 appearances by any attorney granted under
24 this rule in a 3-year period is excessive use of this
25 rule.

26 (b) **Burden on applicant.** The applicant shall have the
27 burden to establish special circumstances and good cause
28 for an appearance in excess of the limitation set forth
in subsection 6(a) of this rule. The applicant shall set
forth the special circumstances and good cause in an
affidavit attached to the original verified application.

1. DATE OF APPLICATION: November 25, 2015

2. APPLYING ATTORNEY: Victor Elliot Schwartz, Esq.


1 3. FIRM NAME AND ADDRESS: Shook, Hardy & Bacon LLP, 1155 F Street,
2 NW, Suite 200, Washington, DC 20004

3 4. NEVADA COUNSEL OF RECORD: Dennis L. Kennedy, Esq., Bailey
4 Kennedy, LLP, 8984 Spanish Ridge Ave., Las Vegas, NV 89148-1302

5 5. In addition to the present application, petitioner made the
6 following previous applications within the last three years:

7 8/6/2014 Admission status is unknown to State Bar

8 DATED this November 30, 2015

9 
10 Laurie K. Scheffler
11 Member Services Admin.
12 Pro Hac Vice Processor
13 STATE BAR OF NEVADA
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