# In the Supreme Court of the State of Nevada

JACKY ROSEN, AN INDIVIDUAL; AND ROSEN FOR NEVADA, A 527 ORGANIZATION, Electronically Filed Jun 12 2018 11:42 a.m. Elizabeth A. Brown Clerk of Supreme Court

Appellants,

Case No. 73274

vs.

DANNY TARKANIAN,

Respondent.

District Court Case No.: A746797

### Appellants' Motion for Leave to Submit Video Exhibits with Appellants' Appendix

BRADLEY SCHRAGER, ESQ., Nevada Bar No. 10217 DANIEL BRAVO, ESQ., Nevada Bar No. 13078 WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP 3556 E. Russell Road, 2nd Floor

Las Vegas, Nevada 89120-2234

MARC E. ELIAS, ESQ. (Pro Hac) ELISABETH C. FROST, ESQ. (Pro Hac) AMANDA R. CALLAIS, ESQ. (Pro Hac) PERKINS COIE LLP

> 700 13th Street, N.W., Suite 600 Washington, D.C. 20005

#### DISCLOSURE STATEMENT PURSUANT TO N.R.A.P. 26.1

The undersigned counsel of record certifies that there are no persons or entities as described in N.R.A.P. 26.1(a) that must be disclosed.

The following law firms have appeared and/or are expected to appear in this Court on behalf of Appellants.

- 1. WOLF RIFKIN SCHULMAN SHAPIRO & RABKIN LLP; and
- 2. PERKINS COIE LLP.

Dated: June 12, 2018 Respectfully submitted,

/s/ Bradley Schrager

Bradley Schrager, Esq.
Nevada State Bar No. 10217
Daniel Bravo, Esq.
Nevada State Bar No. 13078
WOLF RIFKIN SCHULMAN
SHAPIRO & RABKIN LLP
3556 E. Russell Road, 2nd Floor
Las Vegas, Nevada 89120

Marc E. Elias, Esq. (Pro Hac) Elisabeth C. Frost, Esq. (Pro Hac) Amanda R. Callais, Esq. (Pro Hac) PERKINS COIE LLP 700 13th Street, N.W., Suite 600 Washington, D.C. 20005

## Appellants' Motion for Leave to Submit Video Exhibits with Appellants' Appendix

Pursuant to N.R.A.P. 27, Appellants seek leave from this Court to submit non-documentary video exhibits, which are contained in Appellants' appendix, with the Court. See Vol. I of Appellants' Appendix ("AA") at 203-206. Appellants include two full-length videos that were not transcribed on a compact disc with Appellants' appendix. Id. The video exhibits are attached to Appellants' Anti-Slapp Special Motion to Dismiss Under N.R.S. 41.660 that was filed with the district court. I AA 20-40.

///

///

///

///

///

///

///

///

///

Accordingly, in the interests of judicial fairness and efficiency, and for a complete record of the underlying action, Appellants move the Court for an order permitting the exhibits to be filed in their native form and on a compact disc.

Dated: June 12, 2018 Respectfully submitted,

### /s/ Bradley Schrager

Bradley Schrager, Esq.
Nevada State Bar No. 10217
Daniel Bravo, Esq.
Nevada State Bar No. 13078
WOLF RIFKIN SCHULMAN
SHAPIRO & RABKIN LLP
3556 E. Russell Road, 2nd Floor
Las Vegas, Nevada 89120

Marc E. Elias, Esq. (Pro Hac) Elisabeth C. Frost, Esq. (Pro Hac) Amanda R. Callais, Esq. (Pro Hac) PERKINS COIE LLP 700 13th Street, N.W., Suite 600 Washington, D.C. 20005

### **CERTIFICATION OF ATTORNEY**

I hereby certify that this motion complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of 32(a)(5), and the type style requirements of NRAP 32(a)(6), because this motion has been prepared in a proportionally spaced typeface using Microsoft Word in a 14-point Century Schoolbook font.

I further certify that this motion complies with the type-volume limitation of NRAP 32(a)(7) because, excluding the parts of the motion exempted by NRAP 32(a)(7)(C), it is proportionally spaced, has a typeface of 14-point or more, and contains 142 words.

Pursuant to NRAP 28.2, I hereby certify that I have read this motion, and to the best of my knowledge, information, and belief, it is not frivolous or interposed for any improper purpose.

/// ///

///

///

///

///

I understand that I may be subject to sanctions in the event that the accompanying motion is not in conformity with the requirements of the Nevada Rules of Appellate Procedure.

Dated: June 12, 2018 Respectfully submitted,

### /s/ Bradley Schrager

Bradley Schrager, Esq.
Nevada State Bar No. 10217
Daniel Bravo, Esq.
Nevada State Bar No. 13078
WOLF RIFKIN SCHULMAN
SHAPIRO & RABKIN LLP
3556 E. Russell Road, 2nd Floor
Las Vegas, Nevada 89120

Marc E. Elias, Esq. (Pro Hac) Elisabeth C. Frost, Esq. (Pro Hac) Amanda R. Callais, Esq. (Pro Hac) PERKINS COIE LLP 700 13th Street, N.W., Suite 600 Washington, D.C. 20005

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of June, 2018, a true

and correct copy of the foregoing Motion of Appellants for Leave to

Submit Video Exhibits with Appellants' Appendix was served

upon all counsel of record by electronically filing the document using

the Nevada Supreme Court's electronic filing system and by depositing

a true copy of the same for mailing, postage pre-paid, in the U.S. Mail

at Las Vegas, Nevada, said envelope addressed to:

Jenny L. Foley, Ph.D., Esq.

HKM EMPLOYMENT

ATTORNEYS, LLP

10080 Alta Drive, Ste. 110

Las Vegas, Nevada 89145

By: /s/ Christie Rehfeld

Christie Rehfeld, an Employee of WOLF, RIFKIN, SHAPIRO,

SCHULMAN & RABKIN, LLP

5