

# EXHIBIT A

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**SOLA**

DAN POLSENBERG, ESQ.

Nevada Bar No.: 2376

ABRAHAM SMITH, ESQ.

Nevada Bar No.: 13250

Lewis Roca Rothgerber Christie LLP

3993 Howard Hughes Parkway, Suite 600

Las Vegas, Nevada 89169

Telephone (702) 949-8200

Facsimile (702) 949-8398

dpolsenberg@lrrc.com

asmith@lrrc.com

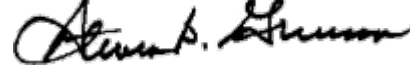
*Attorney for the Plaintiff**In conjunction with Legal Aid Center of Southern Nevada Pro Bono Project*

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5/23/2018 1:20 PM

Steven D. Grierson

CLERK OF THE COURT



## DISTRICT COURT

## CLARK COUNTY, NEVADA

CRISTINA PAULOS

Plaintiff,

vs.

FCH1, LLC, a Nevada limited liability  
company; LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT, a government  
entity; JEANNIE HOUSTON, an individual;  
AARON BACA, an individual; and DOES 1  
through 10,

Defendant.

CASE NO. A-15-716850-C

DEPT. XXXII

**STATEMENT OF LEGAL AID  
REPRESENTATION  
(PURSUANT TO NRS 12.015)**

Party Filing Statement:

☒ Plaintiff/Petitioner☐ Defendant/Respondent

## STATEMENT

CRISTINA PAULOS, has qualified and has been accepted for placement as a Pro Bono client or as a direct client of LEGAL AID CENTER OF SOUTHERN NEVADA, a nonprofit organization providing free legal assistance to indigents, and is entitled to pursue or defend this action without costs, including filing fees and fees for service of writ, process, pleading or paper without charge, as set forth in NRS 12.015.

Dated: May 1, 2018.BARBARA BUCKLEY, ESQ.

Legal Aid Center of Southern Nevada Preparer

Nevada Bar No.: 3918/s/ Barbara E. Buckley

Signature of Legal Aid Center of Southern Nevada Preparer

Submitted by:

Dan F. Polsenberg, Esq.

Abraham Smith, Esq.

Lewis Roca Rothgerber Christie LLP

3993 Howard Hughes Parkway, Suite 600

Las Vegas, Nevada 89169

Telephone (702) 949-8200

Facsimile (702) 949-8398

In the Supreme Court of Nevada

CRISTINA PAULOS,  
Appellant,  
  
vs.  
FCH1, LLC; LAS VEGAS  
METROPOLITAN POLICE  
DEPARTMENT; JEANNIE  
HOUSTON; and AARON BACA,  
Respondents.

Electronically Filed  
Jun 06 2018 07:40 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION TO PLACE APPEAL IN  
PRO BONO APPELLATE PROGRAM**

Cristina Paulos asks this Court to place her appeal in the *pro bono* appellate program developed by the Pro Bono Committee of the state bar's Appellate Litigation Section in conjunction with the Legal Aid Center of Southern Nevada.

Paulos's appellate counsel agreed to take this appeal *pro bono* based on the tremendous injustice that Paulos suffered and the simplicity of the issues on appeal. Paulos was granted *in forma pauperis* status (see Notice Regarding Filing Fee, filed Jan. 31, 2018) and has qualified for free legal assistance with the Legal Aid Center of Southern Nevada (see Ex. A, Statement of Legal Aid Representation, filed May 23,

2018).

Because Paulos already has *pro bono* appellate counsel, the principal effects of granting this motion would be to give Paulos's counsel access to the resources of that program, to track this case statistically with the other cases in that program, and to give Paulos oral argument. This appeal would benefit from that program. In particular, the appeal presents two questions of issue preclusion that would benefit from oral argument: (1) whether a federal district court's finding that a police officer was entitled to qualified immunity because he acted "reasonably" is preclusive when the court of appeals affirms the immunity decision on an alternative ground; and (2) whether the reasonableness of a seizure under the Fourth Amendment is the same issue as the exercise of reasonable care for negligence.

Dated this 5th day of June, 2018.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Abraham G. Smith  
DANIEL F. POLSENBERG (SBN 2376)  
ABRAHAM G. SMITH (SBN 13,250)  
3993 Howard Hughes Parkway, Suite 600  
Las Vegas, Nevada 89169  
(702) 949-8200

*Pro Bono* Attorneys for Appellant

**CERTIFICATE OF SERVICE**

I hereby certify that on June 5, 2018, I submitted the foregoing  
“Motion to Place Appeal in *Pro Bono* Appellate Program” for filing *via*  
the Court’s eFlex electronic filing system. Electronic notification will be  
sent to the following:

CRAIG R. ANDERSON  
MARQUIS AURBACH COFFING  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
*Attorneys for Las Vegas  
Metropolitan Police Department  
and Aaron Baca*

JUSTIN W. SMERBER  
MORAN BRANDON BENDAVID  
MORAN  
630 South Fourth Street  
Las Vegas, Nevada 89101  
*Attorneys for FCH1, LLC and  
Jeannie Houston*

Pro Bono Project  
LEGAL AID CENTER OF  
SOUTHERN NEVADA  
725 E. Charleston Boulevard  
Las Vegas, Nevada 89104

Professor Anne Traum  
UNLV WILLIAM S. BOYD SCHOOL  
OF LAW  
4505 S. Maryland Parkway,  
Box 451003  
Las Vegas, Nevada 89154  
Kelly Dove  
SNELL & WILMER, LLP  
3883 Howard Hughes Parkway, Suite  
1100  
Las Vegas, Nevada 89169  
*Co-chairs of Pro Bono Committee  
Appellate Section of State Bar of  
Nevada*

/s/ Adam Crawford

An Employee of Lewis Roca Rothgerber Christie LLP