

IN THE SUPREME COURT OF THE STATE OF NEVADA

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NEVADA STATE EDUCATION
ASSOCIATION, NATIONAL
EDUCATION ASSOCIATION, RUBEN
MURILLO JR., ROBERT BENSON,
DIANE DI ARCHANGEL, AND JASON
WYCKOFF,

Case No. 79208 Electronically Filed
Sep 12 2019 02:55 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Appellants,

vs.

CLARK COUNTY EDUCATION
ASSOCIATION, JOHN VELLARDITA,
AND VICTORIA COURTNEY,

Respondents.

_____ /

MOTION TO ASSOCIATE COUNSEL

Appellants NEVADA STATE EDUCATION ASSOCIATION, NATIONAL
EDUCATION ASSOCIATION, RUBEN MURILLO JR., ROBERT BENSON,
DIANE DI ARCHANGEL, AND JASON WYCKOFF (collectively, “NSEA
Appellants”), through their Nevada counsel Debbie Leonard, move the Court for
an order permitting Georgina Catherine Yeomans, Esq. to practice in Nevada
pursuant to Nevada Supreme Court Rule 42.

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This motion is supported by the attached “Verified Application for Association of Counsel” (Exhibit 1), “Certificates of Good Standing” (Exhibit 2), and “State Bar of Nevada Statement” (Exhibit 3). Also attached is a proposed Order Admitting to Practice (Exhibit 4).

Date: September 12, 2019.

/s/ Debbie Leonard
Debbie Leonard (Nevada Bar No. 8260)
LEONARD LAW, PC
955 S. Virginia Street, Suite 220
Reno, NV 89502
(775) 964-4656
debbie@leonardlawpc.com

Robert Alexander
Matthew Clash-Drexler
Georgina C. Yeomans (*pro hac application pending*)
BREDHOFF & KAISER, PLLC
805 15th Street, NW, Suite 1000
Washington DC 20005
(202) 842-2600
ralexander@bredhoff.com
mcdrexler@bredhoff.com
gyeomans@bredhoff.com

Attorneys for NSEA Appellants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Leonard Law, PC, and that on September 12, 2019, a copy of the foregoing document was electronically filed with the Clerk of the Court for the Nevada Supreme Court by using the Nevada Supreme Court's E-Filing system (E-Flex). Participants in the case who are registered with E-Flex as users will be served by the EFlex system. All others will be served by first-class mail.

John S. Delikanakis
Bradley T. Austin
Michael Paretti
Snell & Wilmer, L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169

Richard G. McCracken
Kimberly C. Weber
McCracken, Stemerma & Holsberry, LLP
1630 S. Commerce Street, Suite A-1
Las Vegas, NV 89102

Joel A. D' Alba
Asher, Gittler & D' Alba, LTD.
200 West Jackson Blvd, Suite 720
Chicago, Illinois 60606
Attorneys for Respondents

Paul M. Haire
10161 Park Run Drive, Suite 150
Las Vegas, NV 89145
Settlement Judge

/s/ Tricia Trevino
An employee of Leonard Law, PC

EXHIBIT 1

EXHIBIT 1

IN THE SUPREME COURT OF THE STATE OF NEVADA

NEVADA STATE EDUCATION)
ASSOCIATION, NATIONAL EDUCATION)
ASSOCIATION, RUBEN MURILLO,)
ROBERT BENSON, DIANE)
DI ARCHANGEL, and JASON WYCKOFF,)

No. 79208

Petitioners,

V.

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

CLARK COUNTY EDUCATION
ASSOCIATION, JOHN VELLARDITA,
VICTORIA COURTNEY, and CLARK
COUNTY SCHOOL DISTRICT,

Respondents.

Georgina	Catherine	Yeomans, Petitioner, respectfully represents:
First	Middle Name	Last

Nevada State Education Association, National Education Association, Ruben Murillo, Robert Benson, Diane Di Archangel, and Jason Wyckoff.

1. Petitioner resides at 5850 14th Street North

Street Address

_____, Arlington, Virginia
City County State

22205, (703) 980-1857
Zip Code Telephone

2. Petitioner is an attorney at law and a member of the law firm of

Bredhoff & Kaiser, PLC

with offices at 805 15th Street, Northwest, Suite 1000

Street Address

Washington _____, _____, DC
City County State

20005 _____, (202) 842-2600 _____, gyeomans@bredhoff.com.
Zip Telephone Email

3. Petitioner has been retained personally or as a member of the above named law firm by Nevada State Education Association, National Education Association, Ruben Murillo, Robert Benson, Diane Di Archangel, and Jason Wyckoff to provide legal representation in connection with the above-entitled matter now pending before the above referenced court.

4. Since February 5th of 2018, petitioner has been, and presently is, a member of good standing of the bar of the highest court of the State of the District of Columbia 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:

	<u>DATE ADMITTED</u>
<u>Connecticut State Bar</u>	<u>November 2, 2015</u>
<u>United States District Court for the District of Columbia</u>	<u>January 7, 2019</u>

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

8. Has Petitioner ever received public discipline including, but not limited to, suspension or disbarment, by any organization with authority to discipline attorneys at law? You must answer yes

or no. If yes, give particulars, e.g. court, discipline authority, date, status: No

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

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

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

<u>Date of Application</u>	<u>Cause</u>	<u>Title of Court Administrative Body or Arbitrator</u>	<u>Was Application Granted or Denied?</u>
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None

(If necessary, please attach a statement of additional applications)

12. Nevada Counsel of Record for Petition in this matter is:

(must be the same as the signature on the Nevada Counsel consent page)

<u>Debbie</u>	<u>Leonard</u>	<u>8260</u>
First Name	Middle Name	Last Name
		NV Bar #

who has offices at Leonard Law, PC,
Firm Name/Company

<u>955 S. Virginia Street, Suite 220</u>	<u>Reno</u>	<u>Washoe</u>
Street Address	City	County

<u>89502</u>	<u>(775) 964-4656</u>
Zip Code	Phone Number

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

Please see exhibit.

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

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

I, Georgina Catherine Yeomans, do hereby swear/affirm under penalty of perjury that the assertions

Print Petitioner Name

of this application and the following statements are true:


- 1) That I am the Petitioner in the above entitled matter.
- 2) That I have read Supreme Court Rule (SCR) 42 and meet all requirements contained therein, including, without limitation, the requirements set forth in SCR 42(2), as follows:

- (A) I am not a member of the State Bar of Nevada;
- (B) I am not a resident of the State of Nevada;
- (C) I am not regularly employed as a lawyer in the State of Nevada;
- (D) I am not engaged in substantial business, professional, or other activities in the State of Nevada;
- (E) I am a member in good standing and eligible to practice before the bar of any jurisdiction of the United States; and
- (F) I have associated a lawyer who is an active member in good standing of the State Bar of Nevada as counsel of record in this action or proceeding.

- 2) That I have read the foregoing application and know the contents thereof; that the same is true of my own knowledge except as to those matters therein stated on information and belief, and as to the matter I believe them to be true.

That I further certify that I am subject to the jurisdiction of the Courts and disciplinary boards of this state with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada; that I understand and shall comply with the standards of professional conduct required by members of the State Bar of Nevada; and that I am subject to the disciplinary jurisdiction to the State Bar of Nevada with respect to any of my actions occurring in the course of such appearance.

DATED this 21st day of August, 2019

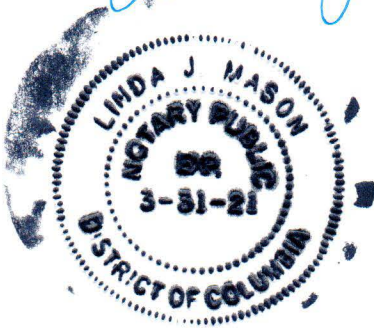

Petitioner/Affiant (blue ink)

STATE OF District of Columbia
COUNTY OF Washington) ss

Subscribed and sworn to before me

this 21st day of August, 20 19


Notary Public



DESIGNATION, CERTIFICATION AND CONSENT OF NEVADA COUNSEL

SCR 42(14) Responsibilities of Nevada attorney of record.

(a) The Nevada attorney of record shall be responsible for and actively participate in the representation of a client in any proceeding that is subject to this rule.

(b) The Nevada attorney of record shall be present at all motions, pre-trials, or any matters in open court unless otherwise ordered by the court.

(c) The Nevada attorney of record shall be responsible to the court, arbitrator, mediator, or administrative agency or governmental body for the administration of any proceeding that is subject to this rule and for compliance with all state and local rules of practice. It is the responsibility of Nevada counsel to ensure that the proceeding is tried and managed in accordance with all applicable Nevada procedural and ethical rules.

I Debbie Leonard hereby agree to associate with Petitioner referenced hereinabove

Print Nevada Counsel Name

and further agree to perform all of the duties and responsibilities as required by Nevada Supreme Court Rule 42.

DATED this 23RD day of August, 2019

Debbie Leonard

Nevada Counsel of Record (blue ink)

STATE OF Nevada)
COUNTY OF Washoe) ss

Subscribed and sworn to before me

this 23RD day of August, 2019

Patricia E. Trevino
Notary Public



Exhibit to No. 13 of Verified Application for Association of Counsel

Name	Mailing Address
Petitioners	
Nevada State Education Association	3511 E. Harmon Ave., Las Vegas, NV 89121
National Education Association	1201 16 th Street, N.W., Washington, D.C. 20036
Ruben Murillo, Jr.	3511 E. Harmon Ave., Las Vegas, NV 89121
Robert Benson	4408 Olive Tree Cir., Las Vegas, NV 89129
Diane Di Archangel	1454 Silver Point Ave., Las Vegas, NV 89123
Counsel for Petitioners	
Debbie Leonard	Leonard Law, PC 955 S. Virginia Street Suite 220 Reno, NV 89502
Robert Alexander	Bredhoff & Kaiser, PLLC 805 15 th Street, NW, Suite 1000 Washington, DC 20005
Matthew Clash-Drexler	Bredhoff & Kaiser, PLLC 805 15 th Street, NW, Suite 1000 Washington, DC 20005
Respondents	
Clark County Education Association	4230 McLeod Dr., Las Vegas, NV 89121
John Vellardita	4230 McLeod Dr., Las Vegas, NV 89121
Victoria Courtney	4230 McLeod Dr., Las Vegas, NV 89121
Clark County School District	5100 West Sahara Ave., Las Vegas, NV 89146
Counsel for Respondents	
Joel A. D'Alba	Asher, Gittler & D'Alba, Ltd. 200 West Jackson Blvd., Suite 720 Chicago, Illinois 60606
John S. Delikanakis Bradley T. Austin Michael Paretti	Snell & Wilmer, LLP 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, NV 89169
Richard G. McCracken Kimberly C. Weber	McCracken, Stemerman & Holsberry, LLP 1630 S. Commerce Street, Suite A-1 Las Vegas, NV 89102

EXHIBIT 2

EXHIBIT 2



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,
the District of Columbia Bar does hereby certify that

Georgina E Yeomans

was duly qualified and admitted on **February 5, 2018** 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 August 27, 2019.

Julio A. Castillo

JULIO A. CASTILLO
Clerk of the Court

Issued By:

ABM
District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email
memberservices@dcbar.org.

State of Connecticut
Supreme Court

I, Carolyn C. Ziogas, Chief Clerk of the Supreme Court of the State of Connecticut and keeper of the Seal thereof,

Do hereby certify, that, in the Supreme Court at **Hartford**
on the **2nd** *day of* **November, 2015**

Georgina Yoemans

of

Arlington, Virginia

having been examined and found duly qualified, was sworn as an attorney and admitted to practice before all courts of this state, and that said attorney is a member of in good standing of the Bar of this State pursuant to Practice Book §2-65.

In Testimony Whereof, I have hereunto set my hand and affix the Seal of the Supreme Court of the State of Connecticut, at Hartford, this day **August 9, 2019**



A handwritten signature in cursive script, reading "Carolyn C. Ziogas", written over a horizontal line.

Carolyn C. Ziogas
Chief Clerk

EXHIBIT 3

EXHIBIT 3

1 STAT

2
3 IN THE SUPREME COURT OF NEVADA OF THE STATE OF NEVADA

4 Case No. 79208

5
6 Nevada State Education
7 Association

8 vs.

9 Clark County Education
10 Association

11 _____/
12 STATE BAR OF NEVADA STATEMENT PURSUANT TO SUPREME COURT RULE
13 42 (3) (b)

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

16 SCR42(6)**Discretion.** The granting or denial of a motion to associate
17 counsel pursuant to this rule by the court is discretionary. The
18 court, arbitrator, mediator, or administrative or governmental
19 hearing officer may revoke the authority of the person permitted to
20 appear under this rule. Absent special circumstances, repeated
appearances by any person or firm of attorneys pursuant to this rule
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: 8/26/2019

2. APPLYING ATTORNEY: Georgina Catherine Yeomans, Esq.

1
2
3 3. FIRM NAME AND ADDRESS: Bredhoff & Kaiser, PLC, 805 15th Street,
4 Northwest, Suite 1000, Washington, DC 20005

5 4. NEVADA COUNSEL OF RECORD: Debbie A. Leonard, Esq., Leonard Law,
6 PC, 955 S. Virginia Street, Suite 220, Reno, NV 89502

7 5. There is no record of previous applications for appearance by
8 petitioner within the past three (3) years.

9 DATED this August 30, 2019


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11 Suzy Moore
12 Member Services Admin.
13 Pro Hac Vice Processor
14 STATE BAR OF NEVADA
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EXHIBIT 4

EXHIBIT 4

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * * *

NEVADA STATE EDUCATION
ASSOCIATION, NATIONAL
EDUCATION ASSOCIATION, RUBEN
MURILLO JR., ROBERT BENSON,
DIANE DI ARCHANGEL, AND JASON
WYCKOFF,

Case No. 79208

Appellants,

vs.

CLARK COUNTY EDUCATION
ASSOCIATION, JOHN VELLARDITA,
AND VICTORIA COURTNEY,

Respondents.

_____ /

[PROPOSED]

ORDER ADMITTING TO PRACTICE

A Motion to Associate Counsel **GEORGINA CATHERINE YEOMANS, ESQ.** having been filed by Nevada counsel pursuant to Nevada Supreme Court Rule 42, together with a Verified Application for Association of Counsel, Certificates of Good Standing for the District of Columbia and the State of Connecticut, and the State Bar of Nevada Statement; said motion having been noticed and no objections having been made; and the Court being fully apprised in the premises, and good cause appearing, it is hereby

ORDERED, that said motion is hereby granted, and **GEORGINA CATHERINE YEOMANS, ESQ.** is hereby admitted to practice in the above-entitled Court for the purposes of the above entitled matter only.

Dated this ____ day of _____, 2019

NEVADA SUPREME COURT JUSTICE