

IN THE SUPREME COURT OF THE STATE OF NEVADA

DANIEL LAKES, AN INDIVIDUAL,

Appellant,

v.

U.S. BANK TRUST, TRUSTEE FOR  
LSF9 MASTER PARTICIPATION  
TRUST,

Respondent.

Case No. 79324

Electronically Filed  
Jun 16 2021 10:19 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**MOTION TO ASSOCIATE COUNSEL STEPHANIE J. PEEL, ESQ.**

Respondent, U.S. Bank Trust, as Trustee for LSF9 Master Participation Trust, moves the Court for an order permitting Stephanie J. Peel, Esq., to practice in Nevada pursuant to Nevada Supreme Court Rule 42. This motion is supported by the attached “Verified Application for Association of Counsel” (Exhibit A), the “Certificates of Good Standing” from the Commonwealth of Pennsylvania and the State of California (Exhibit B), the State Bar of Nevada Statement (Exhibit C); and a proposed Order granting the Motion (Exhibit D).

[Signature On Following Page]

Dated: June 16, 2021

BALLARD SPAHR LLP

By: /s/ Maria A. Gall

Joel E. Tasca, Esq.

Nevada Bar No. 14124

Maria A. Gall, Esq.

Nevada Bar No. 14200

1980 Festival Plaza Drive, Suite 900

Las Vegas, Nevada 89135

Telephone: (702) 471-7000

Facsimile: (702) 471-7070

[tasca@ballardspahr.com](mailto:tasca@ballardspahr.com)

[gallm@ballardspahr.com](mailto:gallm@ballardspahr.com)

*Attorneys for Respondent U.S. Bank Trust,  
as Trustee for LSF9 Master Participation  
Trust*

**CERTIFICATE OF SERVICE**

I hereby certify that this **MOTION TO ASSOCIATE COUNSEL STEPHANIE J. PEEL, ESQ.** was filed electronically with the Nevada Supreme Court on June 16, 2021. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

Doreen Spears Hartwell, Esq.  
HARTWELL THALACKER, LTD  
11920 Southern Highlands Parkway, Suite 201  
Las Vegas, Nevada 89141

/s/ Adam Crawford  
An Employee BALLARD SPAHR LLP

# EXHIBIT A

# EXHIBIT A

1

) No. 79324

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

Stephanie Jo Peel, Petitioner, respectfully represents:

1. Petitioner resides at 6250 Oakdale Avenue

Woodland Hills, Los Angeles County, California

91367 \_\_\_\_\_, (724) 422-8238

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

**McGuireWoods LLP**

with offices at 1800 Century Park East, 8th Floor

Los Angeles, Los Angeles County, California

90067 , (310) 956-3452 , [speel@mcguirewoods.com](mailto:speel@mcguirewoods.com)

Zip	Telephone	Email
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3. Petitioner has been retained personally or as a member of the above named law firm by U.S. Bank Trust, Trustee for LSF9 Master Participation Trust to provide legal representation in connection with the above-entitled matter now pending before the above referenced court.

4. Since July 27 of 2020, petitioner has been, and presently is, a member of good standing of the bar of the highest court of the State of California 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>Pennsylvania</u>	<u>11/26/2001</u>
<u>U.S. Court of Appeals for the Third Circuit</u>	<u>5/12/2015</u>
<u>U.S. Court of Appeals for the Sixth Circuit</u>	<u>6/16/2015</u>
<u>U.S. Court of Appeals for the Ninth Circuit</u>	<u>11/21/2014</u>
<u>U.S. District Court for the Eastern District of Pennsylvania</u>	<u>6/1/2017</u>
<u>U.S. District Court for the Western District of Pennsylvania</u>	<u>5/25/2017</u>
<u>U.S. District Court for the Middle District of Pennsylvania</u>	<u>7/14/2017</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, or any member of petitioner's firm, has/have filed the following application(s) to appear as counsel under Nevada Supreme Court Rule 42 during the past three (3) years in the following matter(s), 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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Please see Attachment 1.

(If more space is needed, you may list previous applications on a separate attachment.)

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>Maria</u>	<u>Alice</u>	<u>Gall</u>	<u>14200</u>
First Name	Middle Name	Last Name	NV Bar #

who has offices at Ballard Spahr LLP  
Firm Name/Company

<u>1980 Festival Plaza Drive, Suite 900,</u>	<u>Las Vegas</u>	<u>Clark County</u>
Street Address	City	County

<u>89135</u>	<u>(702) 868-7535</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 Attachment 2.

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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, Stephanie J. Peel, 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 24<sup>th</sup> day of May, 2021

Stephane J. Peal  
Petitioner/Affiant (blue ink)

STATE OF \_\_\_\_\_ )  
COUNTY OF \_\_\_\_\_ ) ss

Subscribed and sworn to before me

this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_

As the attached today  
Notary Public

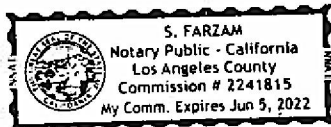
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this 24  
day of May, 2021, by Stephanie Jo  
Peel

proved to me on the basis of satisfactory evidence to be the  
person(s) who appeared before me.



(Seal)

Signature S. Farzam

**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, Maria A. Gall, 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 28<sup>th</sup> day of May, 20 21

Maria A. Gall

Nevada Counsel of Record (blue ink)

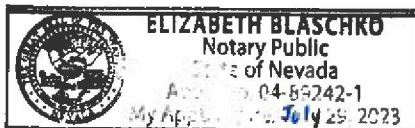
STATE OF Nevada )  
 ) ss  
COUNTY OF Clark )

Subscribed and sworn to before me

this 28<sup>th</sup> day of May, 20 21

Elizabeth Blaschko

Notary Public



**Attachment 1****Response to Question 11**

<b>Date of Application</b>	<b>Cause</b>	<b>Title of Court, Administrative Body, or Arbitrator</b>	<b>Was Application Granted or Denied?</b>
5/21/2019	Aaron Huff v. Affinity Gaming, Inc., dba Rail City Casino, et al.	District Court, Clarke County	Granted
5/21/2019	Aaron Huff v. Truckee Gaming, LLC fdba Sands Regency Casino Hotel, et al.	District Court, Washoe County	Granted
5/21/2019	Aaron Huff v. Sierra Development Company, Inc. dba Club Cal Neva and Siri's Casino, et al.	District Court, Washoe County	Granted
5/21/2019	Ryan Artman v. Monarch Casino & Resort, Inc., et al.	District Court, Washoe County	Granted
4/24/2019	Ryan Artman v. Eldorado Resorts, Inc.	District Court, Washoe County	Granted
4/19/2019	US Bank Trust NA v. Bauman-Banks	District Court, Washoe County	Granted

**Attachment 2**

Response to Question 13

Name	Mailing Address
Daniel Lakes	548 Primrose Hill Avenue Las Vegas, Nevada 89128
U.S. Bank Trust, Trustee for LSF9 Master Participation Trust	U.S. Bank c/o Fay Financial, LLC 1601 LBJ Freeway, Suite 150 Farmers Branch, Texas 75234
Doreen Spears Hartwell (NV Bar No. 7525) <i>Counsel for Daniel Lakes</i>	Hartwell Thalacker, Ltd. 11920 Southern Highlands Pkwy, #201 Las Vegas, Nevada 89141
Laura J. Thalacker (NV Bar No. 5525) <i>Counsel for Daniel Lakes</i>	Hartwell Thalacker, Ltd. 11920 Southern Highlands Pkwy, #201 Las Vegas, Nevada 89141
Joel E. Tasca (NV Bar No. 14124) <i>Counsel for U.S. Bank Trust</i>	Ballard Spahr LLP 1980 Festival Plaza Drive, Suite 900 Las Vegas, Nevada 89135
Maria A. Gall (NV Bar No. 14200) <i>Counsel for U.S. Bank Trust</i>	Ballard Spahr LLP 1980 Festival Plaza Drive, Suite 900 Las Vegas, Nevada 89135
Joseph P. Sakai (NV Bar No. 13578) <i>Counsel for U.S. Bank Trust</i>	Ballard Spahr LLP 1980 Festival Plaza Drive, Suite 900 Las Vegas, Nevada 89135

# EXHIBIT B

# EXHIBIT B



# Supreme Court of California

JORGE E. NAVARRETE  
*Clerk and Executive Officer of the Supreme Court*

## CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

### STEPHANIE JO PEEL

*I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that STEPHANIE JO PEEL, #331900, was on the 27th day of July, 2020, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court  
on the 3rd day of May 2021.*

JORGE E. NAVARRETE  
*Clerk/Executive Officer of the Supreme Court*

By: T. Zhang  
*Tao Zhang, Assistant Deputy Clerk III*



**Supreme Court of Pennsylvania**

**CERTIFICATE OF GOOD STANDING**

***Stephanie Jo Peel, Esq.***

**DATE OF ADMISSION**

***November 26, 2001***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: May 10, 2021**

*Patricia Nicola*

**Patricia A. Nicola  
Chief Clerk**

# EXHIBIT C

# EXHIBIT C

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Daniel Lakes  
vs.  
U.S. Bank Trust

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

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

(b) **Burden on applicant.** The applicant shall have the burden to establish special circumstances and good cause 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.

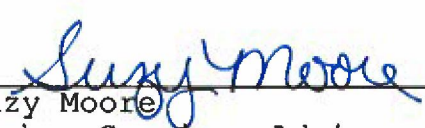
2. APPLYING ATTORNEY: Stephanie Jo Peel, Esq.

1 3. FIRM NAME AND ADDRESS: McGuire Woods, LLP, 1800 Century Park  
2 East, 8th Floor, Los Angeles, CA 90067

3 4. NEVADA COUNSEL OF RECORD: Maria A Gall, Esq., Ballard Spahr  
4 LLP, 1980 Festival Plaza Dr., Suite 900, Las Vegas, NV 89135

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

7 DATED this June 8, 2021

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10 Suzy Moore  
11 Member Services Admin.  
12 Pro Hac Vice Processor  
13 STATE BAR OF NEVADA  
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# EXHIBIT D

# EXHIBIT D

IN THE SUPREME COURT OF THE STATE OF NEVADA

DANIEL LAKES, AN INDIVIDUAL,

Case No. 79324

Appellant,

v.

U.S. BANK TRUST, TRUSTEE FOR  
LSF9 MASTER PARTICIPATION  
TRUST,

Respondent.

**ORDER GRANTING MOTION TO ASSOCIATE COUNSEL.**

Respondent U.S. Bank Trust, Trustee for LSF9 Master Participation Trust, has filed its motion to associate counsel Stephanie J. Peel, Esq. pursuant to SRC 42. Attached to the motion to associate is a verified application, certificates of good standing from the Commonwealth of Pennsylvania and the State of California, and the statement pursuant to SRC 42 from the State Bar of Nevada. The motion, having been served on all parties, no objections having been made, and the Court being fully apprised in the premises, and good cause appearing, is granted. SRC 42(8). Ms. Peel shall be permitted to appear and provide legal representation in the above-entitled Court for the purposes of the above-entitled matter only.

Nevada attorney Maria A. Gall, Esq., of Ballard Spahr LLP shall be responsible for all matters presented by Ms. Peel in this matter. *See* SRC 42(14) (requiring the Nevada attorney of record to be responsible for and actively

participate in the representation of a client in these proceedings, and to be present at all matters in open court); NRAP 25(a)(5) (requiring all documents submitted to the supreme court for filing to include the original signature of at least one attorney of record who is an active member of the State of Nevada); NRAP 46(a)(3) (requiring Nevada counsel to sign all briefs, be present during oral arguments, and be responsible for all briefs and matters presented by foreign counsel).

IT IS SO ORDERED.

Dated this \_\_\_\_ day of \_\_\_\_\_, 2021

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