

IN THE SUPREME COURT OF THE STATE OF NEVADA

SONJIA MACK,

Appellant

v.

BRIAN WILLIAMS; JAMES
DZURENDA; ARTHUR EMLING,
JR.; and MYRA LAURIAN,

Respondents.

Case No. 81513

Electronically Filed
Oct 29 2021 04:09 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

**MOTION TO ASSOCIATE
COUNSEL**

Amicus Curiae Roderick & Solange MacArthur Justice Center hereby move the Court for an order permitting Daniel Greenfield to practice in Nevada pursuant to Nevada Supreme Court Rule 42 (SCR 42). This motion is supported by the attached Verified Application for Association of Counsel (Exhibit A), Certificate of Good Standing from Illinois (Exhibit B), and the State Bar of Nevada Statement (Exhibit C).

Dated this 29th day of October, 2021.

/s/ Margaret A. McLetchie

Margaret A. McLetchie

Nevada Bar No. 10931

McLetchie Law

602 South Tenth Street

Las Vegas, NV 89101

*Counsel for Amicus Curiae Roderick &
Solange MacArthur Justice Center*

NOTICE OF MOTION

TO: All Interested Parties; and

TO: All Counsel of Record

PLEASE TAKE NOTICE that Amicus Curiae Roderick & Solange MacArthur Justice Center will bring the foregoing MOTION TO ASSOCIATE COUNSEL on for decision on the 29th day of October, 2021, in the above-entitled Court.

Dated this 29th day of October, 2021.

/s/ Margaret A. McLetchie

Margaret A. McLetchie

Nevada Bar No. 10931

McLetchie Law

602 South Tenth Street

Las Vegas, NV 89101

*Counsel for Amicus Curiae Roderick &
Solange MacArthur Justice Center*

IN THE SUPREME COURT OF THE STATE OF NEVADA

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v.

BRIAN WILLIAMS; JAMES
DZURENDA; ARTHUR EMLING,
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**ORDER ADMITTING TO
PRACTICE**

DANIEL GREENFIELD, having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Application for Association of Counsel, a Certificate of Good Standing for the state of Illinois, and the State Bar of Nevada Statement; said application having been noticed, no objections having been made, and the Court being fully apprised in the premises, and good cause appearing, it is hereby

ORDERED, that said application is hereby granted, and **DANIEL GREENFIELD** is hereby admitted to practice in the above entitled Court for the purposes of the above entitled matter only.

Dated this _____ day of _____, 2021.

JUSTICE OF THE SUPREME COURT

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 29th day of October 2021, I served a true and correct copy of the foregoing MOTION TO ASSOCIATE COUNSEL as filed, byway of the Supreme Court's electronic filing system to the following:

Travis Barrick (Bar No. 9257)
Gallian Welker & Beckstrom, L.C.
540 E. St. Louis Ave.
Las Vegas, NV 89104

Kiel B. Ireland (Bar No. 15368C)
Deputy Attorney General
Nevada Attorney General's Office
555 E. Washington Avenue, Suite 3900
Las Vegas, NV 89101

DATED this 29th day of October, 2021.

/s/ Margaret A. McLetchie
Margaret A. McLetchie
Nevada Bar No. 10931
McLetchie Law
602 South Tenth Street
Las Vegas, NV 89101

EXHIBIT A

IN THE SUPREME COURT OF THE STATE OF NEVADA

SONJIA MACK,)	No. 81513
Appellant)	
)	
v.)	VERIFIED APPLICATION FOR
)	ASSOCIATION OF COUNSEL UNDER
BRIAN WILLIAMS; JAMES)	<u>NEVADA SUPREME COURT RULE 42</u>
DZURENDA; ARTHUR EMLING, Jr.;)	
and MYRA LAURIAN,)	
Respondents.)	

Daniel Mark Greenfield, Petitioner, respectfully represents:
First Middle Name Last

1. Petitioner resides at 5917 Contra Costa Road
Street Address
Oakland, Alameda, CA
City County State
94618, (312) 898-8819
Zip Code Telephone

2. Petitioner is an attorney at law and a member of the law firm of
Roderick & Solange MacArthur Justice Center, Northwestern Pritzker School of Law
with offices at 375 E. Chicago Avenue
Street Address
Chicago, Cook, IL
City County State
60611, (312) 503-8538, daniel-greenfield@law.northwestern.edu
Zip Telephone Email

3. Petitioner has been retained personally or as a member of the above named law firm by _____
amicus curiae Roderick & Solange MacArthur Justice Center to provide legal representation in
connection with the above-entitled matter now pending before the above referenced court.

4. Since December of 2008, petitioner has been, and presently is, a member of good standing of
the bar of the highest court of the State of Illinois 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

See Attachment to Application of Daniel Greenfield

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>
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)

Margaret A McLetchie 10931

First Name Middle Name Last Name NV Bar #

who has offices at McLetchie Law

Firm Name/Company

602 South Tenth Street Las Vegas Clark

Street Address City County

89101 (702) 728-5300

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

See Attachment to Application of Daniel Greenfield

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, Daniel Mark Greenfield, 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.

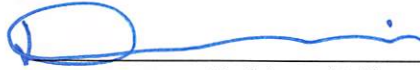
2) That I have read Supreme Court Rule (SCR) 42 and meet all requirements contained therein, including, without limitation, the requirements set forth in SCR 42(2), as follows:

- (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 16 day of October, 2021



Petitioner/Affiant (blue ink)

STATE OF _____)
) ss
COUNTY OF _____)

Subscribed and sworn to before me

this _____ day of _____, 20 _____

Notary Public

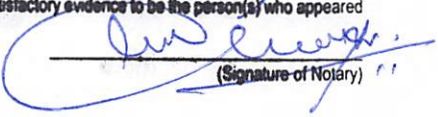
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

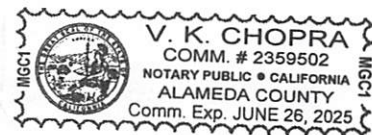
STATE OF CALIFORNIA, ALAMEDA COUNTY

Subscribed and sworn to (or affirmed) before me on this 16th day of OCT, 2021 by DANIEL MARK

GREENFIELD

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


(Signature of Notary)



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 Margaret A. McLetchie 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 15th day of October, 2021

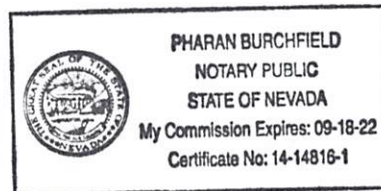

Nevada Counsel of Record (blue ink)

STATE OF NEVADA)
) ss
COUNTY OF CLARK)

Subscribed and sworn to before me

this 15th day of October, 2021.


Notary Public



Attachment to the Application of Daniel Greenfield

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:

Jurisdiction	Date Admitted
State of Illinois, Attorney No. 6296619	Dec. 9, 2008
United States Supreme Court	Apr. 23, 2012
U.S. Court of Appeal for the First Circuit	Sept. 7, 2018
U.S. Court of Appeal for the Second Circuit	June 4, 2021
U.S. Court of Appeal for the Third Circuit	Dec. 11, 2018
U.S. Court of Appeal for the Fourth Circuit	May 19, 2017
U.S. Court of Appeal for the Fifth Circuit	July 10, 2020
U.S. Court of Appeal for the Sixth Circuit	May 24, 2017
U.S. Court of Appeal for the Seventh Circuit	Feb. 5, 2010
U.S. Court of Appeal for the Eighth Circuit	Apr. 8, 2009
U.S. Court of Appeal for the Ninth Circuit	Aug. 3, 2018
U.S. Court of Appeal for the Tenth Circuit	Sept. 8, 2017
U.S. Court of Appeal for the Eleventh Circuit	Sept. 20, 2017
U.S. District Court for the Northern District of Illinois	Nov. 29, 2010

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:

Name	Address
Sonjia Mack <i>Appellant</i>	<i>through counsel</i> Gallian Welker & Beckstrom, L.C. 540 E. St. Louis Avenue Las Vegas, NV 89104
Travis N. Barrick Nathan E. Lawrence <i>Counsel for Appellant Sonjia Mack</i>	Gallian Welker & Beckstrom, L.C. 540 E. St. Louis Avenue Las Vegas, NV 89104 tbarrick@vegascase.com nlawrence@vegascase.com
Arthur Emling, Jr. <i>Respondent</i>	<i>through counsel</i> Office of the NV Attorney General 555 E Washington Avenue Suite 3900 Las Vegas, NV 89101
Brian Williams <i>Respondent</i>	<i>through counsel</i> Office of the NV Attorney General 555 E Washington Avenue Suite 3900 Las Vegas, NV 89101
James Dzurenda <i>Respondent</i>	<i>through counsel</i> Office of the NV Attorney General 555 E Washington Avenue Suite 3900 Las Vegas, NV 89101
Myra Laurian <i>Respondent</i>	<i>through counsel</i> Office of the NV Attorney General 555 E Washington Avenue Suite 3900 Las Vegas, NV 89101
Tiffany E. Breinig Kiel B. Ireland Henry H. Kim <i>Counsel for Respondents</i>	Office of the NV Attorney General 555 E Washington Avenue Suite 3900 Las Vegas, NV 89101 tbreinig@ag.nv.gov kireland@ag.nv.gov hkim@ag.nv.gov
Aaron D. Ford <i>Counsel for Respondents</i>	Office of the NV Attorney General 100 N Carson Street Carson City, NV 89701 aford@ag.nv.gov

EXHIBIT B

Certificate of Admission To the Bar of Illinois

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

Daniel Mark Greenfield

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 12/09/2008 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto
subscribed my name and affixed the
seal of said Court, this 21st day of
October, 2021.

Carolyn Taft Grosboll

Clerk,
Supreme Court of the State of Illinois

EXHIBIT C

1 STAT

2
3 IN THE SUPREME COURT OF THE STATE OF NEVADA

4 Case No. 81513

5
6 Sonjia Mack

7 vs.

8 Brian Williams

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
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.

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

21 (b) **Burden on applicant.** The applicant shall have the
22 burden to establish special circumstances and good cause
23 for an appearance in excess of the limitation set forth
24 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.

25 1. DATE OF APPLICATION: 10/25/2021

26 2. APPLYING ATTORNEY: Daniel Mark Greenfield, Esq.

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28 ///


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1 3. FIRM NAME AND ADDRESS: Roderick & Solange MacArthur Justice
2 Center, Northwestern Pritzker School of Law, 375 E. Chicago
3 Avenue, Chicago, IL 60611

4 4. NEVADA COUNSEL OF RECORD: Margaret A. McLetchie, Esq.,
5 McLetchie Law, 602 South Tenth St., Las Vegas, NV 89101

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

8 DATED this October 28, 2021

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