

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

**MOTION TO ASSOCIATE
COUNSEL**

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

Amicus Curiae Roderick & Solange MacArthur Justice Center hereby move the Court for an order permitting Megha Ram 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), Certificates of Good Standing from California and District of Columbia (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

SONJIA MACK,

Appellant

v.

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

Respondents.

Case No. 81513

**ORDER ADMITTING TO
PRACTICE**

MEGHA RAM, having filed her Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Application for Association of Counsel, Certificates of Good Standing for the state of California and the District of Columbia, 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 **MEGHA RAM** 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.)	

Megha Ram, Petitioner, respectfully represents:
First Middle Name Last

1. Petitioner resides at 1380 Quincy Street NW #5A
Street Address
Washington, Washington DC,
City County State
20001, (650) 799-2677
Zip Code Telephone

2. Petitioner is an attorney at law and a member of the law firm of
Roderick & Solange MacArthur Justice Center
with offices at 501 H Street NE, Suite 275
Street Address
Washington, DC, DC
City County State
20002, (202) 869-3438, megha.ram@macarthurjustice.org
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 August of 2020, petitioner has been, and presently is, a member of good standing of
the bar of the highest court of the State of 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:

DATE ADMITTED

See Attachment to Application of Megha Ram

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>
<u>None</u>			
<hr/>			
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(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 Megha Ram

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, Megha Ram, 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 18 day of October, 2021

Miguel

Petitioner/Affiant (blue ink)

STATE OF DC)
COUNTY OF Washington) ss

Subscribed and sworn to before me

this 18 day of October, 2021

[Signature]
Notary Public



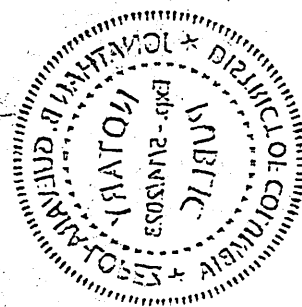
JONATHAN B. GUEVARA-LOPEZ
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires May 14, 2023

DATE _____ TIME _____

100-443681-100

18-00000

1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 26



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)

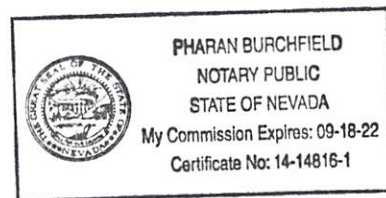
STATE OF NEVADA)
) ss
COUNTY OF CLARK)

Subscribed and sworn to before me

this 15th day of October, 2021.



Notary Public



Attachment to the Application of Megha Ram

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 California, Bar No. 325134 (COGS Attached)	Feb. 8, 2019
District of Columbia, Bar No. 1686962 (COGS Attached)	Aug. 21, 2020
U.S. Court of Appeals for the Third Circuit	Nov. 3, 2020
U.S. Court of Appeals for the Sixth Circuit	Apr. 8, 2020
U.S. Court of Appeals for the Eighth Circuit	Aug. 25, 2020
U.S. Court of Appeals for the Tenth Circuit	Oct. 17, 2019
U.S. Court of Appeals for the Eleventh Circuit	Aug. 13, 2020
U.S. District Court for the District of Columbia	Mar. 1, 2021

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



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

Megha Ram

was duly qualified and admitted on August 21, 2020 as an attorney and counselor entitled to
practice before this Court; and is, on the date indicated below, a(n)
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 October
13, 2021.

A handwritten signature in black ink that reads "Julio A. Castillo".

JULIO A. CASTILLO
Clerk of the Court

A handwritten signature in black ink, likely of the District of Columbia Bar Membership, written over the text "Issued By:". The signature is stylized and appears to be "H. Williams".

Issued By:
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.



The State Bar
of California

180 Howard Street, San Francisco, CA 94105

OFFICE OF ATTORNEY REGULATION &
CONSUMER RESOURCES

AttorneyRegulation@calbar.ca.gov
888-800-3400

CERTIFICATE OF STANDING

October 14, 2021

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, MEGHA RAM, #325134 was admitted to the practice of law in this state by the Supreme Court of California on February 8, 2019 and has been since that date, and is at date hereof, an ACTIVE licensee of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in blue ink, appearing to read "Alex C", is written over a faint, circular embossed seal of The State Bar of California.

Alex Calderon
Custodian of Records

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: Megha Ram, Esq.

27 ///

28 ///


///

1 3. FIRM NAME AND ADDRESS: Roderick & Solange MacArthur Justice
2 Center, 501 H. Street NE, Suite 275, Washington, DC 20002

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

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

7 DATED this October 28, 2021

8
9 
10 Suzy Moore
11 Member Services Admin.
12 Pro Hac Vice Processor
13 STATE BAR OF NEVADA
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