IN THE SUPREME COURT OF THE STATE OF NEVADA

SONJIA MACK,

Appellant

v.

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

Respondents.

Electronically Filed Oct 29 2021 04:10 p.m.

Case No. 81513 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 Rosalind Dillon 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

SONJIA MACK,		
Appellant	Case No. 81513	
v. BRIAN WILLIAMS; JAMES DZURENDA; ARTHUR EMLING, JR.; and MYRA LAURIAN,	ORDER ADMITTING TO PRACTICE	
Respondents.		
ROSALIND DILLON, having file	ed her Motion to Associate Counsel under	
Nevada Supreme Court Rule 42, tog	ether with a Verified Application for	
Association of Counsel, a Certificate of C	Good Standing for the state of Illinois, and	
the State Bar of Nevada Statement; sa	aid application having been noticed, no	
objections having been made, and the Co	ourt being fully apprised in the premises	
and good cause appearing, it is hereby		

Dated this ______day of _______, 2021.

JUSTICE OF THE SUPREME COURT

DILLON is hereby admitted to practice in the above entitled Court for the purposes

of the above entitled matter only.

ORDERED, that said application is hereby granted, and ROSALIND

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	
A	Appellant)	
	V.	,	F COUNSEL UNDER
BRIAN WILLIA	•		EME COURT RULE 42
and MYRA LAU	RTHUR EMLING, Jr.:	;)	
	spondents.)	
	<u></u>	/	
Rosalin	d Eileen	Dillon , Pet	itioner, respectfully represents:
First	Middle Name	Last	, 1 , 1
1. Petitioner resid	des at 1841 S. C	Calumet Avenue,	Apt. 910
Chicago		Cook	IL ,
City		County	State
60616	(970) 216-0913		
Zip Code	Telephone		
2 Potitionari	a an attornor at lass an	d a manushan af tha law form	e
		ad a member of the law firm of	
Roderick	& Solange IVI	acArthur Justice C	enter
_	a	a Avanua	
with offices at 3	75 E. Chicag	o Avenue	
	Street Address	O Avenue	
with offices at 3 Chicago		Cook	, IL
			, IL State
Chicago		Cook	, IL State @macarthurjustice.org

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 November of 2019, petitioner has been, and presently is, a member of good standing of
the bar of the highest court of the State of 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:
State of Illinois, Attorney No. 6332621 (Nov. 7, 2019)
United States Court of Appeal for the Fourth Circuit (Oct. 2021)
United States Court of Appeal for the Seventh Circuit (Dec. 2019)
United States Court of Appeal for the Ninth Circuit (Oct. 2021)
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:
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

	public discipline including, but not li	•
or no. If yes, give particulars, e.g. o	court, discipline authority, date, status:	No
9. Has Petitioner ever had any cert	tificate or privilege to appear and practi	ice before any regulatory
administrative body suspended or red	evoked? You must answer yes or no. If suspension or reinstatement: No	yes, give particulars, e.g.
terminate Petitioner's office as an at	ation, withdrawal, or otherwise, ever te torney in order to avoid administrative, tust answer yes or no. If yes, give partic	disciplinary, disbarment,
	petitioner's firm, has/have filed the fo	
	te so: (do not include Federal Pro Hac	
Date of Application Cause None	Title of Court Administrative Body or Arbitrator	Was Application Granted or <u>Denied?</u>
(If necessary, pleas	e attach a statement of additional appli	cations)

(must be the same as the signature on the Nevada Counsel consent page) 10931 Margaret McLetchie First Name Middle Name Last Name NV Bar# who has offices at McLetchie Law Firm Name/Company Clark 602 South Tenth Street Las Vegas Street Address City County 89101 Zip Code 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 ADDRESSS** See Attachment to Application of Rosalind Dillon 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.

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

- I, <u>Rosalind Eileen Dillon</u>, do hereby swear/affirm under penalty of perjury that the assertions 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.

STATE OF MINOIS
COUNTY OF COOK) ss
Subscribed and sworn to before me
this 18 day of October, 20 21
Notary Public

THE PARTY OF	ANISSA N TORRES
	OFFICIAL SEAL
TO THE WAY	Notary Public, State of Illinois
100	My Commission Expires
DE NO IN	February 17, 2024

Petitioner/Affiant (blue ink)

DATED this 18 day of October, 2021

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 , 20 21

Nevada Counsel of Record (blue ink)

PHARAN BURCHFIELD NOTARY PUBLIC

STATE OF NEVADA Commission Expires: 09-18-22 Certificate No: 14-14816-1

STATE OF NEVADA

COUNTY OF CLARK) ss

Subscribed and sworn to before me

this 15th day of October 20 21.

Tisce

Notary Public

Attachment to the Application of Rosalind Dillon

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

Rosalind Eileen Dillon

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 11/07/2019 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.

Clerk, Supreme Court of the State of Illinois

Carolyn Tast Gosboll

EXHIBIT C

STAT 1 2 IN THE SUPREME COURT OF THE STATE OF NEVADA 3 Case No. 81513 4 5 6 Sonjia Mack 7 vs. 8 Brian Williams 9 STATE BAR OF NEVADA STATEMENT PURSUANT TO SUPREME COURT RULE 10 42 (3) (b) 11 12 THE STATE BAR OF NEVADA, in response to the application of Petitioner, submits the following statement pursuant to SCR42(3): 13 SCR42(6) Discretion. The granting or denial of a motion to associate 14 counsel pursuant to this rule by the court is discretionary. court, arbitrator, mediator, or administrative or governmental 15 hearing officer may revoke the authority of the person permitted to appear under this rule. Absent special circumstances, repeated 16 appearances by any person or firm of attorneys pursuant to this rule 17 shall be cause for denial of the motion to associate such person. 18 (a) Limitation. It shall be presumed, absent special circumstances, and only upon showing of good cause, that 19 more than 5 appearances by any attorney granted under this rule in a 3-year period is excessive use of this 20 rule. 21 (b) Burden on applicant. The applicant shall have the burden to establish special circumstances and good cause 22 for an appearance in excess of the limitation set forth in subsection 6(a) of this rule. The applicant shall set 23 forth the special circumstances and good cause in an affidavit attached to the original verified application. 24 1. DATE OF APPLICATION: 10/25/2021 25 26 2. APPLYING ATTORNEY: Rosalind Eileen Dillon, Esq. /// 27 /// /// 28

- 3. FIRM NAME AND ADDRESS: Roderick & Solange MacArthur Justice Center, 375 E. Chicago Avenue, Chicago, IL 60611
- 4. NEVADA COUNSEL OF RECORD: Margaret A. McLetchie, Esq., McLetchie Law, 602 South Tenth St., Las Vegas, NV 89101
- 5. There is no record of previous applications for appearance by petitioner within the past three (3) years.

DATED this October 28, 2021

Suzy Moore
Member Services Admin.
Pro Hac Vice Processor
STATE BAR OF NEVADA