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Elizabeth A. Brown  
Clerk of Supreme Court

**SUPREME COURT OF NEVADA**

LAWRA KASSEE BULEN, AN  
INDIVIDUAL,

Appellant,

vs.

ROB LAUER, AN INDIVIDUAL; AND  
STEVE SANSON, AN INDIVIDUAL

Respondents

**SUPREME COURT CASE:  
NO. 81854**

[District Court No. A-18-784807]

**MOTION FOR OF APPEARANCE AS COUNSEL FOR RESPONDENTS**

Respondents Steve Sanson and Rob Lauer, hereby request this Honorable Court that attorney Richard Scotti, Esq., of The Firm, P.C., appear as Counsel for Respondents in this matter. This motion is made pursuant to and based upon NRAP 46(d)(2). Respondents and counsel consent to such representation, as stated in the below Affidavit of Counsel.

**POINTS AND AUTHORITIES IN SUPPORT OF MOTION**

Respondents' prior counsel withdrew from representation by approved Order Granting Motion To Withdraw As Counsel, filed December 31, 2020. In that Order this Honorable Court granted Respondents leave to January 31, 2020 to retain new counsel. However, Respondents were unable to afford and pay for new counsel until Thursday, March 4, 2021. (*See* Affidavit of Counsel, para. 1 below). Respondents paid counsel on said date. (*Id.*). Respondents accept the representation of counsel Richard Scotti, Esq. of The Firm, P.C. (*Id.* at para. 2). I am now

1 studying the Record on Appeal. (*Id.* at para. 3). Respondents paid counsel on that date, and said  
2 counsel is now studying the Record on Appeal. (*Id.*). Respondents have been informed of this  
3 new representation, this Motion, the intended appearance of this counsel, and have consented  
4 thereto. (*Id.* at para. 2). Respondents have acknowledge to this counsel that they intend and  
5 desire that this Appeal be resolved in due course, and have not sought to retain new counsel for  
6 delay or any improper purpose. Respondents apologize for the delay in retaining new counsel.

7 DATED THIS \_\_ 8th \_\_ day of March, 2021

8 /s/ Richard F. Scotti, Esq.

9 Richard F. Scotti, Esq.

10 Nevada Bar No. 04744

11 630 S. Third Street

12 Las Vegas, NV 89101

13 Tel: 702-222-3476

14 Fax: 702-252-3476

15 *Attorney for Respondents*

### 16 AFFIDAVIT OF COUNSEL

17 I, Richard F. Scotti, declare and affirm as follows:

18 1. Respondents officially retained me to represent them on Thursday, March 4, 2021.

19 Prior to that date they asked this counsel to represent them but I informed them that I  
20 could not officially represent them until they were able to pay the initial retainer fee  
21 to me. They told me that they could not afford to me until recently, March 4, 2021,  
22 when they remitted payment. I informed Respondents on that date that I could now  
23 represent them, and that I would request this Honorable Court to permit me to appear  
24 as counsel of record.

25 2. Respondents Sanson and Lauer have consented to my representation.

26 3. I accept the representation of the Respondents provided this Court allows me to do so.

27 I am now studying the Record on Appeal.

28 ///

4. I am informed and believe that Respondents have not sought to retain me for delay or any improper purpose

**EXECUTED THIS 8<sup>th</sup> day of March, 2021, in Clark County, Nevada.**

/s/ Richard F. Scotti, Esq.  
Richard F. Scotti, Esq.  
Nevada Bar No. 04744

### **CONCLUSION**

Respondents respectfully request that this Court grant leave to hire new counsel, as stated herein.  
SUBMITTED BY, this March 4, 2021:

/s/ Richard F. Scotti, Esq.  
Richard F. Scotti, Esq.  
Nevada Bar No. 04744  
630 S. Third Street  
Las Vegas, NV 89101  
Tel: 702-222-3476  
Fax: 702-252-3476  
*Attorney for Respondents*

### **PROOF OF SERVICE:**

This is to certify that on this day of March 10, 2021, I caused to be served the above MOTION FOR OF APPEARANCE AS COUNSEL FOR RESPONDENTS, via electronic service on:

Brandon L. Phillips, Esq.  
Nevada Bar No. 12264  
Brandon L. Phillips, Attorney at Law, PLLC  
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[blp@abetterlegalpractice.com](mailto:blp@abetterlegalpractice.com)

Attorneys for Appellants.

/s/ Jacqueline Martinez  
An employee of  
The Firm, P.C., on behalf of  
Richard F. Scotti, Esq.  
*Attorney for Respondents*