

IN THE SUPREME COURT OF THE STATE OF NEVADA

MARILEE BROWN, MARILOU
BROWN
GREGORY J. BROWN (FOR BEVERLY
M. BROWN'S FAMILY),

Appellants,

vs.

ST. MARY'S REGIONAL MEDICAL
CENTER, TAMMY EVANS
(ERRONEOUSLY NAMED
AS TAMI EVANS); PREM REDDY,
M.D.;
TANZEEL ISLAM, M.D., SRIDEVI
CHALLAPALLI, M.D.; and MARK
McALLISTER, M.D.

Respondents.

Case No. 81434-COA

Electronically Filed
Mar 03 2022 09:25 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

NOTICE OF APPEARANCE

Pursuant to NRAP 46(a)(2) and NRAP 46(a)(3), the following counsel hereby notifies this Court of their appearance on behalf of Respondents, ST.MARY'S REGIONAL MEDICAL CENTER, TAMMY EVANS, PREM REDDY, M.D., TANZEEL ISLAM, M.D., AND SRIDEVI CHALLAPALLI, M.D. in the above captioned matter:

JACOB ZVI GOLDSTEIN, ESQ.
Illinois Bar No.
HALL PRANGLE & SCHOONVELD, LLC
1140 North Town Center Drive, Ste. 350
Las Vegas, Nevada 89144
(702) 889-6400 (telephone)
jgoldstein@hpslaw.com

A copy of the Verified Application for Association of Counsel under Nevada Supreme Court Rule 42 and the State Bar of Nevada Statement Pursuant to Supreme court Rule 42(3)(b) is attached hereto as Exhibit A.

DATED this 3rd day of March, 2022.

HALL PRANGLE & SCHOONVELD, LLC

By: /s/ Michael E. Prangle
Michael E. Prangle, Esq. (Bar #8619)
Richard D. De Jong, Esq. (Bar #15207)
HALL PRANGLE & SCHOONVELD, LLC
1140 North Town Center Drive, Ste. 350
Las Vegas, Nevada 89144
*Attorneys for Respondents St. Mary's Regional
Medical Center, Tammy Evans (erroneously
named as Tami Evans),
Prem Reddy, M.D., Tanzeel Islam, M.D. and
Sridevi Challapalli, M.D*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HALL PRANGLE & SCHOONVELD, LLC; that on the 3rd day of March, 2022, I served a true and correct copy of the foregoing **NOTICE OF APPEARANCE** was filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list as follows:

Don Springmeyer, Esq. (Bar #1021)
Kemp Jones LLP
3800 Howard Hughes, Pkwy., 17th
Floor
Las Vegas, Nevada 89169
Attorneys for Appellants

Edward J. Lemons, Esq.
Alice Campos Mercado, Esq.
Lemons, Grundy & Eisenberg
6005 Plumas street, 3rd Floor
Reno, NV 89519
*Attorneys for Respondent Mark
McAllister, M.D.*

/s/ Reina Claus
An employee of HALL PRANGLE & SCHOONVELD, LLC

Exhibit A

Exhibit A

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

MARILEE BROWN, MARILOU BROWN
GREGORY J. BROWN (FOR BEVERLY
M. BROWN'S FAMILY),

Appellants,

vs.

ST. MARY'S REGIONAL MEDICAL
CENTER, TAMMY EVANS
(ERRONEOUSLY NAMED
AS TAMI EVANS); PREM REDDY, M.D.;
TANZEEL ISLAM, M.D., SRIDEVI
CHALLAPALLI, M.D.; and MARK
McALLISTER, M.D.

Respondents.

Case No. 81434-COA

APPEAL FROM THE SECOND JUDICIAL DISTRICT COURT OF THE
STATE OF NEVADA, IN AND FOR THE COUNTY OF WASHOE;
THE HONOTABLE KATHLEEN DRAKULICH, DISTRICT JUDGE

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

Jacob Zvi Goldstein, Petitioner, respectfully represents:

1. Petitioner resides at 1956 W. Evergreen Ave., Chicago, Illinois 60622. (312) 267-6208.
2. Petitioner is an attorney at law and a member of the law firm of: Hall, Prangle & Schoonveld with offices at 200 South Wacker Drive, Suite 3300, Chicago, IL 60606, (312) 345-9600, jgoldstein@hpslaw.com.
3. Petitioner has been retained personally or as a member of the above-named law firm by ST.MARY'S REGIONAL MEDICAL CENTER, TAMMY EVANS, PREM REDDY, M.D., TANZEEL ISLAM, M.D., AND SRIDEVI CHALLAPALLI, M.D.to provide legal

representation in connection with the above-entitled matter now pending before the above referenced court.

4. Since, November 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:

	<u>DATE ADMITTED</u>
<u>United States District Court, Northern District of Illinois</u>	<u>06/22/2006</u>
<u>United States District Court, Southern District of Illinois</u>	<u>11/04/2014</u>
<u>7th Circuit Court of Appeals</u>	<u>02/15/2013</u>
<u>9th Circuit Court of Appeals</u>	<u>09/11/2015</u>
<u>10th Circuit Court of Appeals</u>	<u>09/12/2018</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 matters, 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>March 25, 2019</u>	<u>Drossulis v. Renown,</u>	<u>Second Judicial District Court</u>	<u>Granted (Laura Ginett)</u>
<u>August 8, 2020</u>	<u>Lambert v. Spring Valley Health Care,</u>	<u>8th District Court</u>	<u>Granted (Laura Ginett)</u>
<u>July 2, 2018</u>	<u>Pizanowski v. Nevada Yellow Cab,</u>	<u>8th District Court</u>	<u>Granted (Jacob Goldstein)</u>
<u>March 10, 2020</u>	<u>DeFreitas v. Nevada Checker Cab,</u>	<u>8th District Court</u>	<u>Granted (Jacob Goldstein)</u>
<u>October 24, 2019</u>	<u>Hazelton v. Gordon, MD,</u>	<u>8th District Court</u>	<u>Granted (Michael Tarpey)</u>
<u>February 28, 2019</u>	<u>Schwartz v. Garvey, MD,</u>	<u>4th District Court</u>	<u>Granted (Jennifer Ries-Buntain)</u>
<u>April 12, 2021</u>	<u>Nelson v. Agaton,</u>	<u>8th District Court</u>	<u>Granted (Laura Ginett)</u>
<u>January 12, 2022</u>	<u>White v. Singh,</u>	<u>4th District Court</u>	<u>Pending (Jennifer Ries-Buntain)</u>

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

<u>Michael</u>	<u>E.</u>	<u>Prangle</u>	<u>8619</u>
First Name	Middle Name	Last Name	NV Bar #

who has offices at Hall, Prangle & Schoonveld, LLC,
Firm Name/Company

1140 N. Town Center Dr. Suite 350, Las Vegas, Clark,
Street Address City County

89144, (702) 889-6400.
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
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<u>See attached Exhibit A</u>	
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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, Jacob Z. Goldstein, 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;

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, Michael E. Prangle hereby agree to associate with Petitioner referenced hereinabove and further agree to perform all of the duties and responsibilities as required by Nevada Supreme Court Rule 42.

DATED this 16 day of February, 2022

[Signature]
Nevada Counsel of Record (blue ink)

STATE OF Nevada)
) ss
COUNTY OF Clark)

Subscribed and sworn to before me

this 16th day of February 20 22

[Signature]
Notary Public

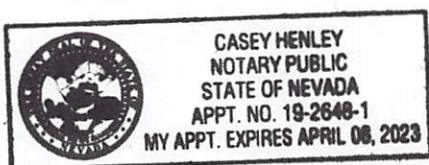


EXHIBIT A

Don Springmeyer, Esq. (Bar #1021)
Kemp Jones LLP
3800 Howard Hughes, Pkwy., 17th Floor
Las Vegas, Nevada 89169
Attorneys for Appellants

Edward J. Lemons, Esq.
Alice Campos Mercado, Esq.
Lemons, Grundy & Eisenberg
6005 Plumas street, 3rd Floor
Reno, NV 89519
Attorneys for Respondent Mark McAllister, M.D.

Certificate of Admission To the Bar of Illinois

I, Cynthia A. Grant, Clerk of the Supreme Court of Illinois, do hereby certify that

Jacob Zvi Goldstein

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 05/04/2006 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 10th day of
February, 2022.

Cynthia A. Grant

Clerk,
Supreme Court of the State of Illinois

1 STAT

2
3 BEFORE THE COURT OF APPEALS
4 STATE OF NEVADA

5 Case No. 81434-COA

6 Marilee Brown

7 vs.

8 St. Mary's Regional Medical
9 Center

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11 STATE BAR OF NEVADA STATEMENT PURSUANT TO SUPREME COURT RULE
12 42 (3) (b)

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

15 SCR42(6)**Discretion.** The granting or denial of a motion to associate
16 counsel pursuant to this rule by the court is discretionary. The
17 court, arbitrator, mediator, or administrative or governmental
18 hearing officer may revoke the authority of the person permitted to
19 appear under this rule. Absent special circumstances, repeated
20 appearances by any person or firm of attorneys pursuant to this rule
21 shall be cause for denial of the motion to associate such person.

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

27 (b) **Burden on applicant.** The applicant shall have the
28 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.

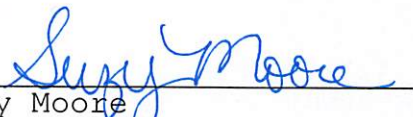
1. DATE OF APPLICATION: 2/23/2022

2. APPLYING ATTORNEY: Jacob Zvi Goldstein, Esq.

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- 1 3. FIRM NAME AND ADDRESS: Hall Prangle & Schoonveld, LLC, 200 S.
2 Wacker Drive, Suite 3300, Chicago, IL 60606
- 3 4. NEVADA COUNSEL OF RECORD: Michael E. Prangle, Esq., Hall
4 Prangle & Schoonveld, LLC, 1140 N. Town Center Dr., Suite 350,
5 Las Vegas, NV 89144
- 6 5. In addition to the present application, petitioner made the
7 following previous applications within the last three years:
8 2/21/2020 ADMISSION GRANTED

9 DATED this March 1, 2022

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