

IN THE SUPREME COURT OF THE STATE OF NEVADA

YEONHEE LEE,

Petitioner,

v.

**EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF NEVADA,
IN AND FOR THE COUNTY OF
CLARK, THE HONORABLE DAVID
M. JONES, DISTRICT JUDGE,**

Respondent,

and

ALBERTO EDUARDO CARIO,

Real Party in Interest.

Electronically Filed
Jun 15 2021 02:33 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court Case No.: _82831____

District Court Case No.: A-19-803446-C

PETITIONER'S MOTION TO ASSOCIATE COUNSEL

Dominica C. Anderson, Nevada Bar No. 2988

Tyson E. Hafen, Esq., Nevada Bar No. 13139

DUANE MORRIS LLP

100 N. City Parkway, Suite 1560

Las Vegas, NV 89106

(702) 868-2600

dcanderson@duanemorris.com

tehafen@duanemorris.com

Attorneys for Petitioner Yeonhee Lee

Petitioner Yeonhee Lee moves this Court for an order permitting Damon N. Vocke to practice in Nevada pursuant to Nevada Supreme Court Rule 42. This motion is supported by the attached verified application for association of counsel (Exhibit A), certificates of good standing from New York and Connecticut (Exhibit B), and the State Bar of Nevada statement (Exhibit C).

DATED: June 15, 2021

DUANE MORRIS LLP

By: /s/ Tyson E. Hafen

DOMINICA C. ANDERSON

Nevada Bar No.: 2988

TYSON E. HAFEN

Nevada Bar No.: 13139

Attorneys for Petitioner

Yeonhee Lee

CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2021, a true and correct copy of **PETITIONER'S MOTION TO ASSOCIATE COUNSEL** was submitted for filing via the Court's eFlex electronic filing system, and electronic notification will be sent to the following:

Jason R. Maier
Julia M. Chumbler
MAIER GUTIERRE & ASSOCIATES
8816 Spanish Ridge Avenue
Las Vegas, Nevada 89148
Attorneys for Real Party in Interest Alberto Eduardo Cario

With a copy delivered by U.S. Mail to:

Honorable David M. Jones
Eighth Judicial District Court, Dept. 29
Regional Justice Center
200 Lewis Avenue
Las Vegas, NV 89155

Office of the Attorney General
100 N. Carson Street
Carson City, NV 89701

/s/ Jana Dailey
Jana Dailey, an employee of
Duane Morris LLP

EXHIBIT A

EXHIBIT A

[illegible]

10036, (212) 692-1059 DNVocke@duanemorris.com
Zip Telephone Email

3. Petitioner has been retained personally or as a member of the above named law firm by _____
_____ Petitioner Yeonhee Lee _____ to provide legal representation in connection with
the above-entitled matter now pending before the above referenced court.

4. Since 9th of November, 2018, petitioner has been, and presently is, a member of good standing of the
bar of the highest court of the State of New York 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

U.S. District Court, So. District of New York November 24, 2020

U.S. District Court, Western District of Pennsylvania August 4, 2020

U.S. District Court, District of Connecticut December 1, 2017

U.S.C.A FOR THIRD CIRCUIT January 20, 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: 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 Hac)*

<u>Date of Application</u>	<u>Cause</u>	<u>Title of Court Administrative Body or Arbitrator</u>	<u>Was Application Granted or Denied?</u>
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N/A

(If more space is needed, you may list previous applications on a separate attachment.)

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

(must be the same as the signature on the Nevada Counsel consent page)

<u>Tyson</u>	<u>E.</u>	<u>Hafen</u>	<u>13139</u>
First Name	Middle Name	Last Name	NV Bar #

who has offices at Duane Morris LLP
Firm Name/Company

<u>100 N. City Parkway, #1560</u>	<u>Las Vegas</u>	<u>Clark</u>
Street Address	City	County

<u>89106</u>	<u>(702) 868-2655</u>
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 attached Exhibit A

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, Damon N. Vocke, 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

State of Nevada;

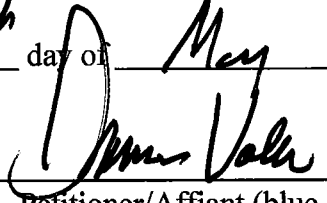
(E) I am a member in good standing and eligible to practice before the bar of any jurisdiction of the United States; and

(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 4th day of May, 2021

 / DAMON
Petitioner/Affiant (blue ink) Vocke

STATE OF NEW YORK)
) ss
COUNTY OF NEW YORK)

Subscribed and sworn to before me

this _____ day of _____, 2021

[See Attached Rider]
Notary Public

ACKNOWLEDGMENT

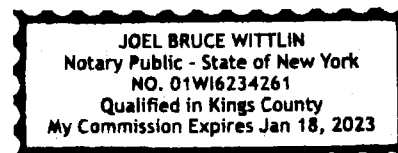
STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

On this 4th day of May, 2021, before me, the undersigned, a Notary Public in and for said State, personally appeared **DAMON N. VOCKE**, by way of video teleconferencing accordance with New York State Executive Order No. 202.7, issued March 19, 2020, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person on behalf of which the individual acted, executed the instrument. A legible copy of the above signed instrument having been transmitted directly to and received by me on the same day it was signed



Notary Public

Notary Public is located in Kings County



DESIGNATION, CERTIFICATION AND CONSENT OF NEVADA COUNSEL

SCR 42(14) Responsibilities of Nevada attorney of record.

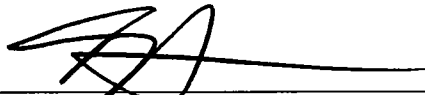
(a) The Nevada attorney of record shall be responsible for and actively participate in the representation of a client in any proceeding that is subject to this rule.

(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, Tyson E. Hafen, 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 19th day of MAY, 2021




Nevada Counsel of Record (blue ink)

STATE OF NEVADA)
) ss
COUNTY OF CLARK)

Subscribed and sworn to before me

this 19th day of May, 2021



Notary Public

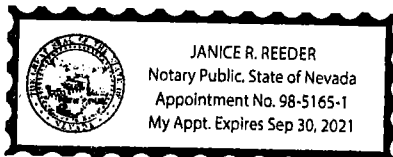


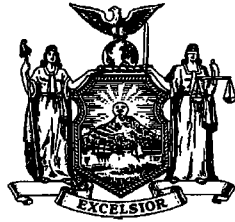
EXHIBIT A

Names of Parties/Names and Addresses of Counsel

PARTY	COUNSEL OF RECORD
Yeonhee Lee, <i>Petitioner</i>	Tyson E. Hafen DUANE MORRIS LLP 100 N. City Parkway, Ste. 1560 Las Vegas, NV 89106
The Honorable David M. Jones, <i>Respondent</i> Eighth Judicial District Court of Nevada 200 Lewis Avenue Las Vegas, NV 89155	Unknown
Alberto Eduardo Cario, <i>Real Party in Interest</i>	Jason R. Maier MAIER GUTIERREZ & ASSOCIATES 8816 Spanish Ridge Ave. Las Vegas, NV 89148

EXHIBIT B

EXHIBIT B



*Appellate Division of the Supreme Court
of the State of New York
Third Judicial Department*

*I, Robert D. Mayberger, Clerk of the Appellate Division of
the Supreme Court of the State of New York, Third Judicial
Department, do hereby certify that*

Damon Nicholas Vocke

*was duly licensed and admitted to practice as an Attorney and
Counselor at Law in all the courts of this State on **November 9,
2018**, has duly taken and subscribed the oath of office prescribed
by law, has been enrolled in the Roll of Attorneys and Counselors
at Law on file in this office, is duly registered with the
Administration Office of the Courts, and according to the records
of this Court is currently in good standing as an Attorney and
Counselor-at-Law.*



*In Witness Whereof, I have hereunto set
my hand in the City of Albany on June
11, 2021.*

Robert D Mayberger

Clerk of the Court

State of Connecticut
Supreme Court

*I, Carl D. Cicchetti, Chief Clerk of the Supreme Court of the State of Connecticut and
keeper of the Seal thereof,*

Do hereby certify, that, in the Superior Court at **Stamford**
on the **28th** *day of* **October, 2016**

Damon Nicholas Vocke

of

Wilton, Connecticut

*having been examined and found duly qualified, was sworn as an attorney and admitted to
practice before all courts of this state, and that said attorney is a member of in good standing of
the Bar of this State pursuant to Practice Book §2-65.*

*In Testimony Whereof, I have hereunto set my hand
and affix the Seal of the Supreme Court of the State of
Connecticut, at Hartford, this day* **June 3, 2021**



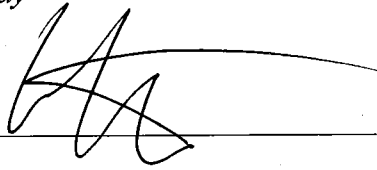

Carl D. Cicchetti
Chief Clerk

EXHIBIT C

EXHIBIT C

1 STAT

2
3 IN THE SUPREME COURT OF THE STATE OF NEVADA

4 Case No. 82831

5 Yeonhee Lee

6 vs.

7 Eighth Judicial District Court
8 of the State of Nevada In and
9 For the Honorable David M Jones
District Judge

10 _____/
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
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.

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

22 (b) **Burden on applicant.** The applicant shall have the
23 burden to establish special circumstances and good cause
24 for an appearance in excess of the limitation set forth
25 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.

26 1. DATE OF APPLICATION: 6/14/2021

27 2. APPLYING ATTORNEY: Damon Nicholas Vocke, Esq.

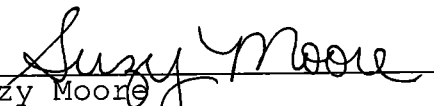
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1 3. FIRM NAME AND ADDRESS: Duane Morris, LLP, 1540 N. Broadway, New
2 York, NY 10036

3 4. NEVADA COUNSEL OF RECORD: Tyson E. Hafen, Esq., Duane Morris
4 LLP, 100 N. City Pkwy., Suite 1560, Las Vegas, NV 89106

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

7 DATED this June 15, 2021

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