IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * * *

AHED SAID SENJAB, Petitioner, vs. THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK, AND THE HONORABLE T. ARTHUR RITCHIE, DISTRICT COURT JUDGE, Respondents, and MOHAMAD ALHULAIBI, Real Party in Interest.	S.C. No.: D.C. Case No.: D-20-606093-D

PETITION FOR WRIT OF MANDAMUS OR PROHIBITION

Pursuant to NRAP 21 and NRS 34.160, Petitioner, Ahed Senjab, through her attorney, Marshal S. Willick, Esq., of the WILLICK LAW GROUP, submits this *Petition for Writ of Mandamus or Prohibition* directing the district court to apply the correct provision of NRS 125A *et seq*, also known as the Uniform Child Custody Jurisdiction and Enforcement Act. Specifically, to apply the provisions of NRS 125A.305(1)(a) in the interpretation of NRS 125A.085(1).

ROUTING STATEMENT

This case is presumptively assigned to the Court of Appeals per NRAP 17(b)(10) as it involves family law matters other than the termination of parental rights or NRS Chapter 432B proceedings.

However, the Nevada Supreme Court should probably retain this Petition under NRAP 17(a)(12) for a couple of reasons. First, this Court is familiar with the facts, circumstances, and has already heard argument on the points involved here, although it chose not to directly address the child custody issues in the earlier *Opinion*. Second, the principal issue concerns original interpretation of the UCCJEA, which is of statewide public importance and an issue of first impression affecting many parties: specifically, original child custody jurisdiction when both parties and a subject child have all left another jurisdiction and moved to Nevada with no intention – or ability – to return elsewhere, but have not been in Nevada long enough to establish it as the home state of a child, which follows up on earlier jurisdictional cases the Court has decided merited *en banc* consideration, as detailed below.

NRAP 26.1 DISCLOSURE

The undersigned counsel of record certifies that the following persons and entities described in NRAP 26.1(a) must be disclosed. In the course of these proceedings leading up to this appeal, Petitioner has been represented by the following attorneys:

a. Marshal S. Willick, Esq., and Richard L. Crane, Esq., of the WILLICK LAW GROUP

b. April Green, Esq., of the LEGAL AID CENTER SOUTHERN NEVADA.

There are no corporations, entities, or publicly-held companies that own 10% or more of Petitioner's or Respondent's stock, or business interests.

DATED this 4th day of April, 2022.

Respectfully Submitted By:
WILLICK LAW GROUP

//s// Marshal S. Willick
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I. PROCEDURAL POSTURE AND REASON FOR WRIT PETITION

The remand from this Court directed the district court to proceed with the divorce action filed by Petitioner. The district court issued an order that denied that Nevada had jurisdiction to issue a child custody order under the provisions of NRS 125A.305(1)(a),[1] and set an evidentiary hearing for June 9, 2022, on the question of whether Saudi Arabia could not be the home state of the child because that country violates fundamental principles of human rights.[2]

The basis for all proceedings now set in the district court is its fundamental error as to the jurisdiction of the district courts of Nevada over child custody proceedings when both parents and the subject child have all moved to Nevada from some other place in which no custody proceedings are now, or ever have been, pending. The district court has expressed the incorrect opinion that our courts may not address the custody of such children under the UCCJEA.

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[1] VII AA 967-980, 836, 866-925.

[2] VII AA 928-930.

This case is the logical follow up to this Court's decisions in *Friedman*,[3] *Senjab I*,[4] *Ewalefo*,[5] and *Ogawa*,[6] and provides a vehicle for instructing the district courts about child custody jurisdiction in this common circumstance.

II. ISSUES PRESENTED AND RELIEF SOUGHT

The issue is whether the district court erred in determining that Nevada does not have jurisdiction to make an initial child custody determination under NRS 125A.305(1)(a) when both parents and the child have left a previous residence and moved to Nevada.

Petitioner seeks a mandate from this Court that the district court apply the provisions of NRS 125A.305(1)(a) to find that Nevada has jurisdiction to proceed in an initial child custody determination because both parents and the child moved to and are physically present in Nevada and no parent or child remains anywhere else.

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[3] *Friedman v. Dist. Ct.*, 127 Nev. 842, 264 P.3d 11 (2011).

[4] *Senjab v. Alhulaibi*, 137 Nev. ___, ___ P.3d ___ (Adv. Op. No. 64, Oct. 21, 2021) ("*Senjab I*").

[5] *Davis v. Ewalefo*, 131 Nev. 445, 352 P.3d 1139 (2015).

[6] *Ogawa v. Ogawa*, 125 Nev. 660, 221 P.3d 699 (2009).

Should the writ not be granted, the district court will proceed in the case, failing to apply the correct law, to an evidentiary hearing on the subject of the internal domestic relations law of a foreign country, which will then lead to an unnecessary appeal and yet another one or two year delay in obtaining a custody and support order for a subject minor child. It is possible that the child will be spirited off to a non-Hague country from which there is no realistic possibility of recovery.

III. STATEMENT OF FACTS

Ahed Said Senjab (mother), Mohamad Alhulaibi (father), and their child Ryan Alhulaibi are all Syrian citizens who lived temporarily in Saudi Arabia before moving to Nevada: Mohamad in August, 2018; and Ahed and Ryan in January, 2020.[7] All three have been residents of Nevada ever since.

A *Complaint for Divorce* was filed by Ahed on March 23, 2020, in Clark County, Nevada,[8] including requests for child custody and child support. It is

[7] IV AA 627, 644; VII AA 733, 850. The first several volumes of the Appendix are identical to the record from *Senjab I*, so we continued the numbering for volumes IV-VII.

[8] I AA 2-5.

undisputed that no child custody action was ever filed anywhere by anyone except the Nevada action, and that both parties and the child *moved* to Nevada.[9]

The case was assigned to Department H, the Hon. T. Arthur Ritchie presiding. Mohamad filed a *Motion to Dismiss for Lack of Jurisdictional Requirements* on April 14 in lieu of an *Answer*.[10] After various proceedings, the district court filed its order dismissing the divorce case on June 17, 2020.[11]

Mohamad then filed a *Motion* seeking to take the child to Saudi Arabia.[12] Ahed opposed it and sought abduction prevention measures.[13]

Ahed filed her *Notice of Appeal* from the case dismissal on July 16, 2020,[14] and sought a stay on appeal on July 17,[15] which Mohamad opposed.[16]

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[9] IV AA 627, n.13, 644; VII AA 850.

[10] I AA 13-22.

[11] I AA 228-235.

[12] II AA 255-288.

[13] II AA 293-321.

[14] II AA 367-369; Case No. 81515.

[15] II AA 375-389.

[16] II AA 415-440.

The district court denied Mohamad's petition to take the child and entered temporary orders during pendency of the appeal, noting that the *Extended Order of Protection* granted to Ahed against Mohamad remained in effect until February, 2021. Mohamad filed appeals from those orders,[17] all of which were later dismissed.

Ahed filed her Fast Track Statement on September 21, 2020.[18] Mohamad filed his Response,[19] Ahed filed her Reply,[20] and oral argument was held before this Court *en banc* on June 1, 2021. The facts recited by this Court in Case No. 81515 are fully applicable here.

This Court issued its decision as 137 Nevada Advanced Opinion 64 on October 21, which reversed and remanded the case to the district court to proceed with the divorce,[21] explicitly holding that both Mohamad and Ahed are residents of Nevada and that only residency is required for divorce jurisdiction. Footnote 1 to the decision

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[17] Cases 82114 and 82121.

[18] IV AA 537-583.

[19] IV AA 584-617.

[20] IV AA 618-632.

[21] IV AA 633-639.

said: "Senjab also raises custody and support issues that we decline to consider because, as she admits, the district court did not reach them."[22]

On remand, Ahed filed a motion seeking temporary custody and child support[23] which Mohamad opposed.[24] He then filed a *Motion to Dismiss Child Custody Claims* contending that the district court lacked custody jurisdiction,[25] which Ahed opposed.[26]

This Court dismissed Mohamad's appeals 82114 and 82121 on January 6, 2022, mooting much of Mohamad's arguments in the district court for dismissing the child custody case. On January 11, the district court held a hearing on all pending motions, but continued it until March. There were further filings.

At the hearing on January 11, the district court denied the *Motion to Dismiss the Child Custody Claims*, finding that it did *not* have child custody jurisdiction under the UCCJEA, but might be required to take it anyway if it determined that Saudi Arabia – which the district court declared to be the Home State of the child – did not

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[22] IV AA 635.

[23] IV AA 650-671.

[24] V AA 675-720.

[25] VII AA 732-753.

[26] VII AA 757-787.

honor fundamental notions of due process and equal protection. The district court set an evidentiary hearing on that issue.[27]

On April 1, 2022, the *Order* from the January 11 hearing was entered.[28] This writ petition follows.

IV. STANDARD OF REVIEW AND SUMMARY OF THE ARGUMENT

A writ of mandamus is available to compel the performance an act which the law requires as a duty resulting from an office, trust or station, or to control a manifest abuse or an arbitrary or capricious exercise of discretion.[29] While writs are discretionary, and generally this Court declines to consider writ petitions from interlocutory orders, it will do so when the petition presents an opportunity to clarify

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[27] VII AA 928-933.

[28] VII AA 986.

[29] *Canarelli v. Eighth Judicial Dist. Court (Canarelli II)*, 138 Nev. ___, ___ P.3d ___ (Adv. Opn. No. 12, Mar. 24, 2022), quoting from *Cote H. v. Eighth Judicial Dist. Court*, 124 Nev. 36, 39, 175 P.3d 906, 907-08 (2008) (internal quotes and alterations omitted).

an important issue of law, especially in a matter of first impression, and doing so serves judicial economy.[30]

Where, as here, jurisdictional facts are not disputed, subject matter jurisdiction under the UCCJEA involves questions of law which are reviewed *de novo*[31] and, while discretionary, "issuing writs to ensure that courts comply with the subject matter jurisdiction laws embodied by the UCCJEA is proper."[32]

Statutory interpretation is a question of law that this Court reviews *de novo*.[33] If statutory language is clear and unambiguous, the Court does not look beyond its plain meaning unless that meaning was clearly not intended.[34]

Here, the district court found that the parties had been in Nevada for less than six months when the child custody litigation was initiated, and concluded incorrectly from that fact that Nevada does not have jurisdiction to decide child custody. That

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[30] *Id*., citing *Helfstein v. Eighth Judicial Dist. Court*, 131 Nev. 909, 912, 362 P.3d 91, 94 (2015); *Humboldt Gen. Hosp. v. Sixth Judicial Dist. Court*, 132 Nev. 544, 547, 376 P.3d 167, 170 (2016).

[31] *Friedman*, *supra*, citing *Ogawa v. Ogawa*, 125 Nev. 660, 221 P.3d 699 (2009).

[32] *Friedman*, *supra*, citing *State ex rel. Ferrara v. Neill*, 165 S.W.3d 539, 544 (Mo. Ct. App. 2005) and other authority.

[33] *State v. Catanio,* 120 Nev. 1030, 102 P.3d 588 (2004).

[34] *State v. Quinn*, 117 Nev. 709, 713, 30 P.3d 1117, 1120 (2001).

was a mis-reading of the basic structure and purpose of the Uniform Child Custody Jurisdiction and Enforcement Act ("UCCJEA").

Resolving the jurisdictional issue by way of writ petition will eliminate at least several months of district court proceedings, plus an inevitable appeal and remand, and thus about a year of delay before the child at issue has an appropriate custody order. As this Court has observed, and particularly in matters of child custody, Nevada's appellate courts are committed to the proposition that "justice delayed is justice denied."[35] It is apparent that additional guidance on this matter of jurisdiction is required for the district courts, and this Court found in *Friedman* that doing so by way of a writ of mandate is appropriate.

[35] *Dougan v. Gustaveson*, 108 Nev. 517, 523, 835 P.2d 795, 799 (1992). As this Court observed in ADKT 381, "In the Matter of Amendments to the Nevada Rules of Appellate Procedure" (April 7, 2006), delay in child custody matters "has a particularly burdensome effect" because "delay deprives the subject children of certainty and stability in their living situations and may result in a detrimental impact on their emotional well-being."

V. ARGUMENT

A. Initial Custody Jurisdiction Under the UCCJEA

The objectives of the UCCJEA are to prevent jurisdictional conflicts and re-litigation of child custody issues, and to deter child abduction.[36] The UCCJEA addresses those objectives by limiting to ***one*** court the authority to make custody determinations, even though more than one court may have personal jurisdiction over the parties and a legitimate interest in the parent-child relationship.[37]

As this Court noted in *Friedman*, the UCCJEA prescribes "uniform standards to be applied to determine whether a state has jurisdiction—initial or exclusive and continuing—over custody matters,"[38] and the four successive tests set out in NRS 125A.305(1) are "the exclusive jurisdictional basis for making a child custody determination by a court of this State." NRS 125A.305(1)(a) states:

> 1. Except as otherwise provided in NRS 125A.335, a court of this State has jurisdiction to make an initial child custody determination *only* if:

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[36] UCCJEA § 101 (1997), cmt., 9 U.L.A. 657 (1999); *see also, e.g., Ruffier v. Ruffier*, 190 S.W.3d 884, 889 (Tex. App. 2006).

[37] *See Ogawa v. Ogawa*, 125 Nev. 660, 221 P.3d 699 (2009), citing *Hart v. Kozik*, 242 S.W.3d 102, 106-07 (Tex. App. 2007).

[38] *Friedman*, citing *Sidell v. Sidell*, 18 A.3d 499, 505 (R.I. 2011).

> (a) This State is the home state of the child on the date of the commencement of the proceeding or was the home state of the child within 6 months before the commencement of the proceeding *and the child is absent from this State but a parent or person acting as a parent continues to live in this State.*

[Emphasis Added.]

In other words, a prior residence can ***only*** be considered a "home state" under the UCCJEA if one of the parties continues to physically reside there when the custody proceedings are commenced. It is a prerequisite for section (a) to apply that "the child is absent from [that] State **but a parent or person acting as a parent continues to live in [that] State**.[39]

As explained in CLE materials:[40]

> If all parties and children leave the [prior] State, the analysis is different. . . . [W]hether a State ***would have been*** the Home State of the child within 6 months of the start of proceedings becomes irrelevant if it cannot exercise Home State jurisdiction because its courts cannot find (as required) that at the moment of the first filing, "the child is absent, but a parent or person acting as a parent continues to live in" the State.

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[39] NRS 125A.085(1); NRS 125A.305.

[40] *See*, *e.g.*, Marshal Willick, *The Basics of Family Law Jurisdiction*, 22 Nev. Fam. L. Rep. (Fall, 2009) at 11 ("*Basics*").

Where (as here) no parent remains in the prior state when a child custody action is filed within six months of moving to Nevada, the child does not *have* a home state, and the exclusive jurisdictional test moves to the second of the four tests set out at NRS 125A.305(1)(b):

> (b) A court of another state does not have jurisdiction pursuant to paragraph (a) . . . and:
>
> (1) The child and the child's parents, or the child and at least one parent or a person acting as a parent, have a significant connection with this State other than mere physical presence; and
>
> (2) Substantial evidence is available in this State concerning the child's care, protection, training and personal relationships.

As noted above, there was no prior custody case filed anywhere, and the mother, father, and child, all left their prior residence years earlier and all moved to Nevada. Nevada is the ***only*** "significant connection" state.[41]

There has never *been* a child custody case in Saudi Arabia or anywhere else in the world. But even if there ***had*** been such a case, as this Court held in *Friedman*, that prior place would have lost the ability to enter further orders as soon as any court found that both parties and the child had moved from that prior place. Here, both the

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[41] No one has lived in either Syria or Saudi Arabia for years; the parties were only temporary residents of Saudi Arabia in any event, there is no evidence of any kind there, and their visas to even visit there have long ago expired. VII AA 849-865.

district court and this Court have made that finding, and the official Comments to the UCCJEA make any arguments about "domicile" or an intention to someday return to some prior place completely irrelevant:

> The statutory language is intended to deal with where the people involved ***actually live***, not with any sense of a technical domicile.[42] Regardless of whether a State considers a parent a domiciliary, the State loses exclusive, continuing jurisdiction after the child, the parents, and all persons acting as parents have moved from the State.

The grounds for UCCJEA jurisdiction are identical to that declared by this Court for divorce jurisdiction in *Senjab I*: "residence" (meaning actual physical *location*), not "domicile."[43]

In short, this case concerns *original jurisdiction*, not modification jurisdiction, but in ***either*** case Nevada, and only Nevada, has UCCJEA jurisdiction to enter a child custody order.

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[42] *Basics* at 12, quoting Official Comments to Section 202. Even in the stricter discussions of modification jurisdiction after a state has issued a custody order, "The phrase 'do not presently reside' **is not used in the sense of a technical domicile**. The fact that the original determination State still considers one parent a domiciliary does not prevent it from losing exclusive, continuing jurisdiction after the child, the parents, and all persons acting as parents have moved from the State.

[43] *See Senjab I* (distinguishing residence and domicile), *Davis v. Ewalefo*, 131 Nev. 445, 352 P.3d 1139 (2015) ("Ewalefo's and E.D.'s residency made Nevada E.D.'s "home state" as defined in NRS 125A.085 when Davis filed this action").

B. The District Court Incorrectly Found No Custody Jurisdiction

The district court did not address child custody jurisdiction in its original decision to dismiss the whole case,[44] but incorrectly stated that Nevada did not have custody jurisdiction when both parties and the child moved here,[45] which error was exacerbated by the false assertion by Mohamad's counsel that Saudi Arabia was the "Home State" of the child.[46]

On remand, we pointed out that under the jurisdictional tests of the UCCJEA, the *only* court that had jurisdiction under the UCCJEA was Nevada,[47] but the district court stated that *Friedman* is "irrelevant," and contradicted this Court's holding that both parties are residents of Nevada, stating that because Mohamad came to Nevada to go to school several years ago, "he can't be a Nevada resident."[48]

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[44] I AA 226, 228-235.

[45] III AA 516; see also II AA 394. The district court repeatedly confused the residency requirement for divorce jurisdiction with jurisdiction over child custody: "They're not the home state because the plaintiff came with the child, was here in Nevada for six weeks." VII AA 903-904. We pointed out that the six week test did not apply, VII AA 905, but the district court continued to refer to the six week divorce residence test. VII AA 921.

[46] III AA 514.

[47] VII AA 796, 890.

[48] VII AA 892.

The district court continues to fixate on Mohamad's assertion that he came to the United States to attend school and someday intends to return to Saudi Arabia. That conflates residence and domicile – the same error that led to *Senjab I* – and frustrated application of the UCCJEA, which is ***solely*** concerned with *residence*, and explicitly ***not*** concerned with "domicile," as detailed above.

The district court misread the Uniform Child Custody Jurisdiction and Enforcement Act and misconstrued the applicable part of its central purpose, expressing that he just does not "believe" that the statute means what it says, and insisting that where, as here, all parties left the prior residence years ago, that prior residence remains the "home state" anyway depending on the *reason* everyone moved to Nevada, if one of the parties continues to claim that prior residence as his domicile.[49]

Throughout the proceedings below, both Mohamad[50] and the district court repeatedly and incorrectly asserted that if the child custody proceeding in Nevada was filed before the parties had been here for at least six months, Nevada just could not

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[49] VII AA 877, 879, 891-892, 904-905, 911-912.

[50] VII AA 735.

assert custody jurisdiction.[51] This ignores the second (and third, and fourth) successive tests set out in NRS 125A.350(1) for UCCJEA jurisdiction, and is simply incorrect.

NRS 125A.305(1)(a) is unambiguous and the words have plain meaning: at the moment custody proceedings were initiated, the child at issue did not have a home state, and the applicable test is the second of the four successive tests, "significant connection," under NRS 125A.305(1)(b).

Even if there ***had*** been some prior case in Saudi Arabia, that country would have lost CEJ when both parties and the child moved to Nevada, because the test is the snapshot of where the parties are living when the child custody case is filed, as this Court held in *Friedman* and many other cases have held.[52]

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[51] VII AA 892, 911-912.

[52] *See*, *e.g.*, *In re B.C.B.*, 411 P.3d 926, 930 (Colo. Ct. App. 2015) ("because neither the parties nor B.C.B. still lived in Idaho when father petitioned for parental responsibilities, Idaho was not B.C.B.'s home state for purposes of the UCCJEA" and the court assessed jurisdiction under the Significant Connection Test); *Brandt v. Brandt*, 268 P.3d 406 (Colo. 2012) ("the issuing state nevertheless may not be divested of exclusive continuing jurisdiction by any other state unless no party presently resides in the issuing state"); *Highfill v. Moody*, 2010 Tenn. App. LEXIS 355 (Tenn. Ct. App. 2010) (A new state is authorized to determine that the original state lost its jurisdiction "when the child, the child's parents and any person acting as a parent do not presently reside in the other State. In other words, a court of the modification State can determine that all parties have moved away from the original State"); *In re H.P.*, 2015-Ohio-1309 (2015) "While the parties did not necessarily

In this case, no other "state" has jurisdiction for multiple reasons, including that (1) everyone has moved from the prior state; (2) there is no Home State that could exercise CEJ under UCCJEA definitions; and (3) since all parties had been in Nevada for months at the time the proceedings were filed (and ever since), this state has a significant connection with the parties and child and the only relevant evidence is here.

Nevada, and ***only*** Nevada, can legitimately assert child custody jurisdiction in this case, and the courts of this state have the duty to protect the children within its borders. It is not necessary to ever reach, nevertheless have an evidentiary hearing on, the fundamental denials of due process in Saudi Arabia rendering it ineligible to be considered a "state" under the UCCJEA.[53]

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relinquish jurisdiction in California the moment they moved to Ohio, they certainly relinquished jurisdiction . . . once the custody proceedings were filed while both parties were permanently living in Ohio").

[53] VII AA 914-915.

VI. CONCLUSION

Under the applicable statute, there is no question that Nevada has child custody jurisdiction, and it was error for the district court to dismiss the argument that Nevada is the only state that can exercise child custody jurisdiction.

This Court should issue a Writ of Mandamus directing the district court to recognize and exercise jurisdiction over child custody, applying the provision of the UCCJEA codified at NRS 125A.305(1)(a)-(b).

Additionally, since the statute is clear and unambiguous, the writ of mandate should direct the district court to vacate the currently scheduled evidentiary hearing and set the case for resolution of all divorce issues, including child custody and support.

DATED this 4th day of April, 2022.

Respectfully Submitted By:
WILLICK LAW GROUP

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CERTIFICATE OF COMPLIANCE

1. I hereby certify that this brief complies with the formatting requirements of NRAP 27(d), the typeface requirements of NRAP 32(a)(5) and type style requirements of NRAP 32(a)(6) because this brief has been prepared in a proportionally spaced typeface using Corel WordPerfect 16 in 14 point Times New Roman type style.

2. I further certify that this brief complies with the page or type-volume limitations of NRAP 21(d) because, excluding the parts of the brief exempted by NRAP 32(a)(7)(C), it is proportionately spaced, has a typeface of 14 points or more and contains 4,052 words.

3. Finally, I hereby certify that I have read this Petition For Writ of Mandamus or Prohibition, and to the best of my knowledge, information, and belief, it is not frivolous or interposed for any improper purpose.

4. I have read the preceding filing, and I have personal knowledge of the facts contained therein, unless stated otherwise. Further, the factual averments contained therein are true and correct to the best of my knowledge, except those matters based on information and belief, and as to those matters, I believe them to be true.

5. The factual averments contained in the preceding filing are incorporated herein as if set forth in full.

6. I further certify that this brief complies with all Nevada Rules of Appellate Procedure. I understand that I may be subject to sanctions in the event that the accompanying brief is not in conformity with the requirements of the Nevada Rules of Appellate Procedure.

DATED this 4th day of April, 2022..

WILLICK LAW GROUP

//s// Marshal S. Willick
MARSHAL S. WILLICK, ESQ.
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VERIFICATION

Marshal S. Willick, Esq., being first duly sworn, deposes and says that:

I am an attorney duly licensed to practice law in the State of Nevada. I am an attorney at the Willick Law Group, and I am the attorney representing Petitioner, Ahed Senjab. I have read the preceding filing, and it is true to the best of my knowledge, except those matters based on information and belief, and as to those matters, I believe them to be true.

/s/Marshal. S. Willick
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CASE NO: D-20-606093-D
Department: To be determined

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

AHED SAID SENJAB, Plaintiff, vs. MOHAMAD ALHULAIBI, Defendant,	)	Case No.: Dept. No.: **STATEMENT OF LEGAL AID REPRESENTATION AND FEE WAIVER (PURSUANT TO NRS 12.015)**

Party Filing Statement: **X** Plaintiff/Petitioner ☐ Defendant/Respondent

STATEMENT

AHED SAID SENJAB, Plaintiff herein, has qualified and been accepted for placement as a direct client of LEGAL AID CENTER OF SOUTHERN NEVADA, a nonprofit organization providing free legal assistance to indigents in Clark County, Nevada, and is entitled to pursue or defend this action without costs as defined in NRS 12.015.

Dated: March 24, 2020

APRIL S. GREEN, ESQ.
Printed Name of Preparer

Signature of Preparer

Submitted by:

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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Willick Law Group and that on 4th day of April, 2022, I served a true and correct copy of the Petitioner's *Petition for Writ of Mandamus or Prohibition* by electronically with the Clerk of the Nevada Supreme Court, to the following:

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