

**IN THE SUPREME COURT  
OF THE STATE OF NEVADA**

NEVADANS FOR REPRODUCTIVE  
FREEDOM, a political action  
committee,

Appellant,

v.

DONNA WASHINGTON, an individual;  
COALITION FOR PARENTS AND  
CHILDREN, a political action  
committee; and FRANCISCO V.  
AGUILAR, in his official capacity as  
Secretary of State of Nevada,  
Respondents..

Electronically Filed  
Dec 22 2023 01:59 PM  
Case No.: **87681** Elizabeth A. Brown  
Clerk of Supreme Court  
First Judicial District Court  
Case No.: 23 OC 0115 1B

**MOTION TO ASSOCIATE COUNSEL JOSEPH SANDLER  
PURSUANT TO SUPREME COURT RULE 42**

Nathan R. Ring (NSB 12078)  
STRANCH, JENNINGS & GARVEY PLLC  
3100 W. Charleston Blvd., Suite 208  
Las Vegas, NV 89102  
Tel: (725) 235-9570  
nring@stranchlaw.com

Joseph E. Sandler (Motion to  
Associate pending)  
SANDLER REIFF LAMB ROSENSTEIN &  
BIRKENSTOCK, P.C.  
1090 Vermont Ave. N.W., Suite 750  
Washington, D.C. 20005  
Tel: (202) 479-1111  
sandler@sandlerreiff.com

Proposed Amicus, BALLOT INITIATIVE STRATEGY CENTER FOUNDATION, by and through their counsel of record at Stranch, Jennings & Garvey, PLLC, hereby move this Court, pursuant to Nevada Supreme Court Rule 42, for an Order permitting Joseph Eric Sandler, Esq. to practice in this Court for the purposes of this case only.

Joseph Sandler, Esq., having complied with the requirements set forth in SCR 42, hereby submits his Verified Application for Association of Counsel under Supreme Court Rule 42, as Exhibit 1; Certificates of Good Standing for the State of Maryland, and the District of Columbia included herewith as Exhibit 2, and the State Bar of Nevada Statement Pursuant to Supreme Court Rule 42(3)(b), as Exhibit 3.

DATED this 22nd day of December, 2023.

By: /s/ Nathan R. Ring  
Nathan R. Ring, Esq.  
Nevada Bar No. 12078  
STRANCH, JENNINGS & GARVEY, PLLC  
3100 W. Charleston Blvd., Ste 208  
Las Vegas, NV 89102  
Email: nring@StranchLaw.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of December 2023, a true and correct copy of this Motion to Associate Counsel was served on all counsel of record by electronically filing the document using the Nevada Supreme court's electronic filing system.

/s/ Suzanne Levenson  
Suzanne Levenson  
an employee of Stranch, Jennings & Garvey

# EXHIBIT 1



STRANCH, JENNINGS & GARVEY  
PLLC

IN THE SUPREME COURT OF THE STATE OF NEVADA

Nevadans for Reproductive Freedom ) No. 87681  
)  
)  
v. )  
Donna Washington et al. ) VERIFIED APPLICATION FOR  
) ASSOCIATION OF COUNSEL UNDER  
) NEVADA SUPREME COURT RULE 42  
)  
)  
)

Joseph Eric Sandler, Petitioner, respectfully represents:  
First Middle Name Last

1. Petitioner resides at 2401 Pennsylvania Avenue N.W. Apt 802  
Street Address

Washington, \_\_\_\_\_, \_\_\_\_\_ D.C.  
City County State

20037, ( 202 ) 607-0700  
Zip Code Telephone

2. Petitioner is an attorney at law and a member of the law firm of

Sandler Reiff Lamb Rosenstein & Birkenstock, P.C.

with offices at 1090 Vermont Ave., N.W. Suite 750  
Street Address

Washington, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_ D.C.  
City County State

20005, ( 202 ) 479-1111, sandler@sandlerreiff.com  
Zip Telephone Email

3. Petitioner has been retained personally or as a member of the above named law firm by BB  
Ballot Initiative Strategy Center Foundation to provide legal representation in  
connection with the above-entitled matter now pending before the above referenced court.

4. Since December 15 of 1978, petitioner has been, and presently is, a member  
of good standing of the bar of the highest court of the District of Columbia,  
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>Maryland Supreme Court (Md Bar)</u>	<u>Dec. 26, 2013</u>
<u>Supreme Court of the United States</u>	<u>May 15, 1995</u>
<u>U.S.. Court of Appeals District of Columbia Circuit</u>	<u>Feb. 9, 1979</u>
<u>See attached for additional admissions</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

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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

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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

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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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NONE

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(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)

Nate Ring 12078  
First Name Middle Name Last Name NV Bar #

who has offices at Stranch Jennings & Garvey PLLC  
Firm Name/Company

3100 W. Charleston Blvd. Suite 208  
Las Vegas  
Street Address City County

Street Address City County

89102 , ( 725 235 9750 )  
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
<u>See attached exhibit</u>	

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, Joseph E. Sandler, 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 received a copy of, read, and will adhere to the Nevada Creed of Professionalism and Civility.
- 3) 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.
- 4) 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.

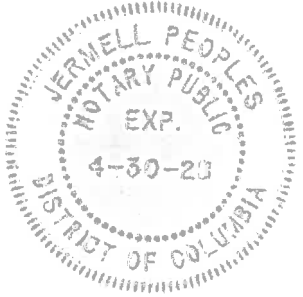
DATED this 13<sup>th</sup> day of December, 2023

[Signature]  
Petitioner/Affiant (blue ink)

STATE OF Washington DC )  
 ) SS  
COUNTY OF District of Columbia )

Subscribed and sworn to before me  
this 13 day of December, 2023

[Signature]  
Notary Public



**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 Nathan Ring 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 18<sup>th</sup> day of December, 2023

  
\_\_\_\_\_  
Nevada Counsel of Record (blue ink)

STATE OF Nevada  
COUNTY OF Clark ) ss  
 )

Subscribed and sworn to before me

this 18<sup>th</sup> day of December, 20 23

  
Notary Public



**SUZANNE LEVENSON**  
Notary Public-State of Nevada  
Appointment No. 22-8842-01  
My Appointment Expires Sept. 12, 2026

Joseph Eric Sandler

List of Additional Bar Admissions

	Date Admitted
U.S. District Court -District of Columbia	Feb. 5, 1979
U.S. District Court—District of Maryland	Jan. 7, 2015
U.S. Court of Appeals—Eighth Circuit	Oct. 21, 2008
U.S. Court of Appeals—Eleventh Circuit	Nov. 20, 2007
U.S. District Court—Eastern District of Michigan	June 9, 2021

Joseph Eric Sandler  
Verified Application for Association of Counsel

List of ALL Parties and Counsel in Matter

**Plaintiffs**

Donna Washington  
Coalition for Parents and Children

Counsel:

Jason D. Guinasso  
Hutchison & Steffen, PLLC  
5371 Kietzke Lane  
Reno, NV 89511

**Defendant**

Francisco Aguilar in his official capacity as Secretary of State of Nevada

Counsel:

Laena St. Jules  
Senior Deputy Attorney General  
100 N. Carson Street  
Carson City, NV 89701

**Intervenor-Defendant**

Bradley S. Schrager  
Daniel Bravo  
Bravo Schrager  
6675 South Tenaya Way Suite 200  
Las Vegas, NV 89113

# EXHIBIT 2



STRANCH, JENNINGS & GARVEY  
PLLC



*On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,  
the District of Columbia Bar does hereby certify that*

## ***Joseph E Sandler***

*was duly qualified and admitted on December 15, 1978 as an attorney and counselor entitled to  
practice before this Court; and is, on the date indicated below, an Active member in good  
standing of this Bar.*

*In Testimony Whereof,  
I have hereunto subscribed my  
name and affixed the seal of this  
Court at the City of  
Washington, D.C., on December 13, 2023.*

*Julio A. Castillo*  
JULIO A. CASTILLO  
Clerk of the Court

Issued By:

A handwritten signature in black ink, appearing to read "David Chu".

David Chu - Director, Membership  
District of Columbia Bar Membership

***For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email  
memberservices@dcbar.org.***

# Supreme Court of Maryland

Annapolis, MD



## ***CERTIFICATE OF GOOD STANDING***

STATE OF MARYLAND, ss:

I, Gregory Hilton, Clerk of the Supreme Court of Maryland, do hereby certify that on the twenty-sixth day of December, 2013,

***Joseph Eric Sandler***

having first taken and subscribed the oath prescribed by the Constitution and Laws of this State, was admitted as an attorney of said Court, is now in good standing, and as such is entitled to practice law in any of the Courts of said State, subject to the Rules of Court. This certificate of good standing is valid through the tenth day of February, 2024.



**In Testimony Whereof**, I have hereunto set my hand as Clerk, and affixed the Seal of the Supreme Court of Maryland, this twelfth day of December, 2023.

*Gregory Hilton*

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Clerk of the Supreme Court of Maryland



# EXHIBIT 3



STRANCH, JENNINGS & GARVEY  
PLLC

1 STAT

2  
3 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

4 Case No. 87681

5  
6 Nevadans For Reproductive  
7 Freedom

8 vs.

9 Donna Washington  
\_\_\_\_\_ /

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

12  
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: 12/18/2023

2. APPLYING ATTORNEY: Joseph Eric Sandler, Esq.


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1 3. FIRM NAME AND ADDRESS: Sandler Reiff Lamb Rosenstein &  
2 Birkenstock, P.C., 1090 Vermont Avenue N.W., Suite 750,  
3 Washington, DC 20005

4 4. NEVADA COUNSEL OF RECORD: Nathan R. Ring, Esq., Stranch,  
5 Jennings & Garvey, PLLC, 3100 W. Charleston Blvd., Ste. 208,  
6 Las Vegas, NV 89102

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

9 DATED this December 19, 2023

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