

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

2 WELLS FARGO BANK,

3 Appellant,

4 vs.

5 DUKE RENSLOW and TINA
6 RENSLOW,

7 Respondents.
8
9

SUPREME COURT NO. 58283

District Court Case No. CV10-03382

Electronically Filed
Aug 17 2011 04:36 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

10 **MOTION TO ASSOCIATE COUNSEL**

11 WELLS FARGO BANK, Appellant, by and through its counsel of record, the firm
12 of SNELL & WILMER LLP, hereby moves this Court for an order permitting ANDREW
13 MARTIN JACOBS, of the law firm of SNELL & WILMER L.L.P., UniSource Energy
14 Tower, One South Church Avenue, Suite 1500, Tucson, Arizona 85701, telephone
15 number (520) 882-1207, to practice in the State of Nevada pursuant to Nevada Supreme
16 Court Rule 42.

17 This Motion is supported by the attached Verified Application for Association of
18 Counsel of Mr. Franklin, attached hereto as **Exhibit A**; his original Certificate of Good
19 Standing Issued by the Disciplinary Clerk for and on Behalf of the Supreme Court of
20 Arizona, attached hereto as **Exhibit B**; his original Certificate of the Clerk of the Supreme
21 Court of the State of Arizona, attached hereto as **Exhibit C**; and the original State Bar of

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 Nevada Statement Pursuant to Supreme Court Rule 42(e)(b), attached as **Exhibit D**.

2 DATED this _____ day of August, 2011.

3 SNELL & WILMER, L.L.P.

4
5 Kelly H Dove

CYNTHIA L. ALEXANDER

Nevada Bar No. 6718

KELLY H. DOVE

Nevada Bar No. 10569

3883 Howard Hughes Parkway, Suite 1100

Las Vegas, NV 89169

6
7
8
9
10 *Attorneys for Appellant Wells Fargo Bank*

CERTIFICATE OF SERVICE

As an employee of Snell & Wilmer L.L.P., and I certify that I served a copy of the foregoing **MOTION TO ASSOCIATE COUNSEL** on the 17th day of August, 2011, via electronic service through the Nevada Supreme Court's ECF System upon each party in the case who is registered as an electronic case filing user and via U.S. First Class Mail, as follows:

Carole M. Pope, Esq.
The Law Offices of Carole M. Pope
301 Flint Street
Reno, NV 89501

Attorneys for Petitioners


An Employee of Snell & Wilmer L.L.P.

EXHIBIT A

EXHIBIT A

IN THE SUPREME COURT OF THE STATE OF NEVADA

WELLS FARGO BANK,)	
)	
Appellant,)	Supreme Court No. 58283
)	District Court Case No. CV10-03382
vs.)	
)	
DUKE RENSLOW and TINA)	
RENSLOW,)	
)	
Respondents.)	
_____)	

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

Andrew Martin Jacobs, Petitioner, respectfully represents:
First Middle Name Last

1. Petitioner resides at _____
Street Address

Tucson Pima AZ 85745
City County State Zip Code

(520) 743-8039
Telephone

2. Petitioner is an attorney at law and a member of the law firm of: _____
Snell & Wilmer, L.L.P.

with offices at _____
Street Address

Tucson Pima AZ 85701
City County State Zip Code

(520) 882-1207 ajacobs@swlaw.com.
Telephone Email

3. Petitioner has been retained personally or as a member of the above named law firm by

Appellant Wells Fargo Bank to provide legal representation in
connection with the above-entitled matter now pending before the above referenced court.

4. Since _____ of _____, petitioner has been, and presently is, a member of

good standing of the bar of the highest court of the State of Arizona 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>Supreme Court of Arizona</u>	<u>October 29, 2011</u>
<u>Supreme Court of Illinois</u>	<u>November 14, 1992</u>
<u>United States District Court, District of Arizona</u>	<u>January 2002</u>
<u>United States District Court, Northern District of Illinois</u>	<u>January 1994</u>
<u>United States District Court, Eastern District of Michigan</u>	<u>June 2011</u>
<u>United States Court of Appeals, Seventh Circuit</u>	<u>February 23, 2004</u>
<u>United States Court of Appeals, Ninth Circuit</u>	<u>September 2, 2005</u>

6. Petitioner is not currently suspended or disbarred in any court except as hereinafter provided (Give particulars; e.g., Court, jurisdiction, date): Not applicable.

7. Petitioner is not currently subject to any disciplinary proceedings by any organization with authority at law except as hereinafter provided (give particulars, e.g. court, discipline authority, date, status): Not applicable.

8. Petitioner has never received public discipline including, but not limited to, suspension or disbarment, by any organization with authority to discipline attorneys at law except as hereinafter provided (give particulars, e.g. court, discipline authority, date, status):

Not applicable.

9. Petitioner has never had any certificate or privilege to appear and practice before any regulatory administrative body suspended or revoked except as hereinafter provided (give particulars, e.g. date, administrative body, date of suspension or reinstatement): _____

Not applicable.

10. Petitioner, either by resignation, withdrawal, or otherwise, has never terminated or attempted to terminate Petitioner's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings except as hereinafter provided; Not applicable.

11. Petitioner has 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: *(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>June 15, 2010</u>	<u>Velasco v. Wells Fargo</u>	<u>Eighth Judicial District Court</u>	<u>Yes</u>

(If necessary, please attach a statement of additional applications)

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

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

Kelly Harrison Dove 10569
First Name Middle Name Last Name Bar #

who has offices at Snell & Wilmer L.L.P.
Firm Name/Company

3883 Howard Hughes Parkway, Suite 1100, Las Vegas Clark
Street Address City County

89169 (702) 784-5286
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:

NAME	MAILING ADDRESS
<u>Wells Fargo Bank - Appellant</u>	<u>Snell & Wilmer L.L.P.</u>
<u>Represented by: Cynthia L. Alexander and</u>	<u>3883 Howard Hughes Pkwy, Ste. 1100,</u>
<u>Kelly H. Dove</u>	<u>Las Vegas, NV 89169</u>

<u>Duke and Tina Renslow - Respondents</u>	<u>Law Offices of Carole M. Pope</u>
<u>Represented by: Carole M Pope</u>	<u>301 Flint Street</u>
	<u>Reno, NV 89501</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, ANDREW M. JACOBS, do hereby swear/affirm under penalty of perjury that the assertions of this application are true:

That I am the Petitioner in the above entitled matter; that I have read the foregoing 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 12th day of August, 2011

Andrew Jacobs

Petitioner/Affiant

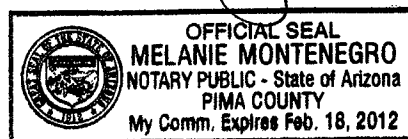
If this signature is not in blue ink, you have a copy.

STATE OF ARIZONA)
) ss
COUNTY OF PIMA)

Subscribed and sworn to before me

this 12th day of August, 2011

Melanie Montenegro
Notary Public



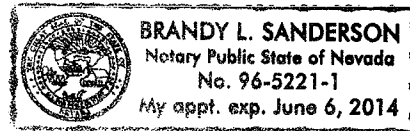
I, KELLY H. DOVE, hereby consent as Nevada Counsel of Record to the
Print NV Counsel name

designation of Petitioner to associate in this cause pursuant to SCR 42.

DATED this _____ day of August, 2011.

Kelly H Dove
Counsel of Record
If this signature is not in blue ink, you have a
copy.

STATE OF NEVADA)
) SS
COUNTY OF CLARK)



Subscribed and sworn to before me

this 16th day of August, 2011.

[Signature]
Notary Public
13522069/

Certificate of Admission To the Bar of Illinois

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

Andrew Martin Jacobs

has been duly licensed and admitted to practice as an Attorney and Counselor of 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 November 5, 1992 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Thursday, August 11, 2011.

Carolyn Taft Grosboll

Clerk

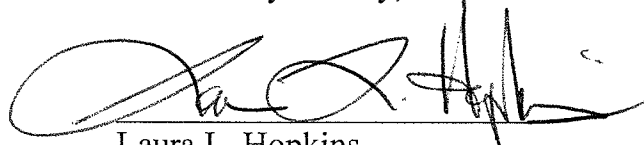
EXHIBIT B

EXHIBIT B

CERTIFICATE OF GOOD STANDING
ISSUED BY THE DISCIPLINARY CLERK
FOR AND ON BEHALF OF
THE SUPREME COURT OF ARIZONA

The Disciplinary Clerk pursuant to Rule 74, Rules of the Supreme Court of Arizona, hereby certifies that according to the records of the State Bar, **ANDREW JACOBS** was duly admitted to practice as an attorney and counselor at law in all courts of Arizona by the Supreme Court of Arizona on October 29, 2001 and is now, as of the date of this Certificate, an active member of the State Bar of Arizona in good standing.

Given under the seal of the Disciplinary
Clerk of the Supreme Court of Arizona
this 27th day of May, 2011.

A handwritten signature in black ink, appearing to read 'Laura L. Hopkins', written over a horizontal line.

Laura L. Hopkins
Disciplinary Clerk

EXHIBIT C

EXHIBIT C

**CERTIFICATE OF THE CLERK OF THE SUPREME COURT
OF THE
STATE OF ARIZONA**

I, Rachelle M. Resnick, Clerk of the Supreme Court of the State of Arizona, hereby certify that, according to the records of my office and upon the recommendation of the Disciplinary Clerk of the Supreme Court of Arizona

ANDREW JACOBS

was on the 29th day of October, 2001, duly admitted to practice as an Attorney and Counselor at Law in all the courts of Arizona; that no disciplinary proceedings are pending against this attorney in the Arizona Supreme Court as of the date of this certificate; and that this name now appears on the Roll of Attorneys in this office as an active member of the Bar in good standing.

*Given under my hand and the seal of
said Court this 3rd day of June,
2011.*

RACHELLE M. RESNICK, Clerk

By *Allison Carro*
Allison Carro
Deputy Clerk II

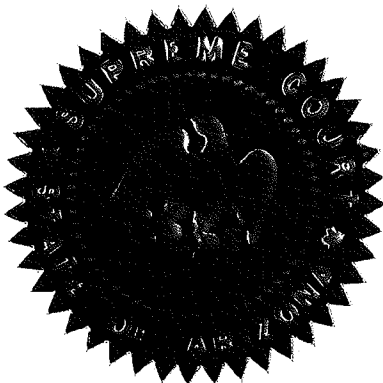


EXHIBIT D

EXHIBIT D

1 STAT

2
3 IN THE SUPREME COURT OF THE STATE OF NEVADA

4 Case No. 58283

5
6 Wells Fargo

7 vs.

8 Duke Renslow

9 _____/
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
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: 7/25/2011

2. APPLYING ATTORNEY: Andrew Martin Jacobs, Esq.

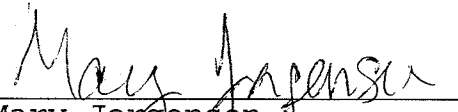
3. FIRM NAME AND ADDRESS: Snell & Wilmer LLP, One South Church
Street, Suite 1500, Tucson, AZ 85701

1 4. NEVADA COUNSEL OF RECORD: Kelly H. Dove, Esq., Snell & Wilmer,
2 3883 Howard Hughes Pkwy., Suite 1100, Las Vegas, NV 89121

3 5. In addition to the present application, petitioner made the
4 following previous applications within the last three years:

5 06/15/2010 ADMISSION STATUS NOT REPORTED

6
7 DATED this August 16, 2011

8 
9 Mary Jorgensen
10 Member Services Coordinator
11 Pro Hac Vice Processor
12 STATE BAR OF NEVADA
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28