

IN THE SUPREME COURT OF THE STATE OF NEVADA

Nautilus Insurance Company
v.
Access Medical, LLC; Robert
Clark Wood, II; and Flournoy
Management LLC

No. 79130

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

Electronically Filed
Nov 18 2019 11:09 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

Linda Sharon Wendell Hsu, Petitioner, respectfully represents:
First Middle Name Last

1. Petitioner resides at 21 Bridgegate Drive

Street Address

San Rafael, Marin, CA
City County State

94903, (415) 979-2024
Zip Code Telephone

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

Selman Breitman LLP

with offices at 33 New Montgomery, Sixth Floor
Street Address

San Francisco, San Francisco, CA
City County State

94105, (415) 979-0400, lhsu@selmanlaw.com
Zip Telephone Email

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

4. Since 12/15 of 1992, petitioner has been, and presently is, a member of good standing of
the bar of the highest court of the State of California 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>U.S.D.C. Northern District of California</u>	<u>8/5/1992</u>
<u>U.S.C.D. Eastern District of California</u>	<u>12/9/1996</u>
<u>Washington DC Bar</u>	<u>4/1/2013</u>
<u>Washington State Bar</u>	<u>1/28/2014</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 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, 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>None</u>			
<hr/>			

(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)

Gil Glancz 9813
First Name Middle Name Last Name NV Bar #

who has offices at Selman Breitman LLP
Firm Name/Company

3993 Howard Hughes Parkway, Suite 200, Las Vegas, Clark
Street Address City County

89169, (702) 228-7717
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 separate sheet with all parties and all counsel

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, Linda Wendell Hsu, 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.

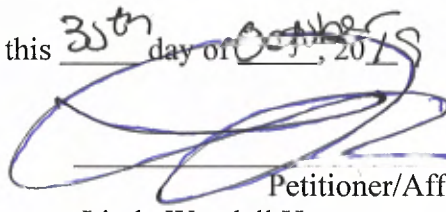
2) That I have read Supreme Court Rule (SCR) 42 and meet all requirements contained therein, including, without limitation, the requirements set forth in SCR 42(2), as follows:

- (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 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 30th day of October, 2019



Petitioner/Affiant (blue ink)

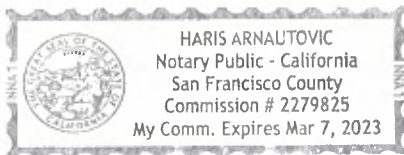
Linda Wendell Hsu

STATE OF California)
) ss
COUNTY OF San Francisco)

Subscribed and sworn to before me

this 30th day of October, 2019

Haris A
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 Gil Glancz 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 8th day of November, 2019

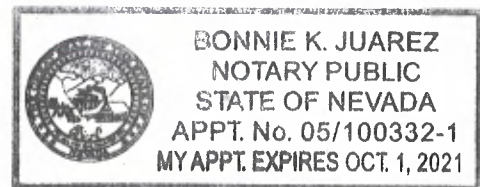
Gil Glancz
Nevada Counsel of Record (blue ink)

STATE OF NEVADA)
) ss
COUNTY OF CLARK)

Subscribed and sworn to before me

this 8th day of November, 2019

Bonnie Kerkhoff Juarez
Notary Public
BONNIE KERKHOFF JUAREZ



Martin Kravitz
L. Renee Green
KRAVITZ, SCHNITZER & JOHNSON
8985 S. Eastern Ave., Ste. 200
Las Vegas, NV 89123
Phone: (702) 362-6666
Facsimile: (702) 362-2203
Email: mkravitz@ksjattorneys.com
rgreen@ksjattorneys.com

Attorneys for ROBERT CLARK WOOD, II and ACCESS MEDICAL, LLC

Jordan P. Schnitzer
THE SCHNITZER LAW FIRM
9205 W. Russell Road, Suite 240
Las Vegas, NV 89148
Phone: (702) 960-4050
Facsimile: (702) 960-4092
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Attorneys for ROBERT CLARK WOOD, II; and ACCESS MEDICAL, LLC

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HARPER | SELIM
1707 Village Center Circle, Suite 140
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Phone: (702) 948-9240
Facsimile: &702) 778-6600
Email: eservice@harperselim.com

Attorneys for FLOURNOY MANAGEMENT CO., LLC



The State Bar
of California

OFFICE OF ATTORNEY REGULATION
& CONSUMER RESOURCES

180 Howard Street, San Francisco, CA 94105

888-800-3400

AttorneyRegulation@calbar.ca.gov

CERTIFICATE OF STANDING

October 17, 2019

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, LINDA SHARON WENDELL, #162971 was admitted to the practice of law in this state by the Supreme Court of California on December 15, 1992; that at her request, on April 2, 2002, her name was changed to LINDA SHARON WENDELL HSU on the records of the State Bar of California; that she has been since the date of admission, and is at date hereof, an ACTIVE licensee of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in blue ink that reads "Louise Turner".

Louise Turner
Custodian of Records

CERTIFICATION OF CURRENT STATUS

October 17, 2019

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the Washington State Bar Association, **Linda Wendell Hsu**, license no. **47155** was licensed or admitted to the practice of law as a lawyer in this state by the Washington Supreme Court on **January 28, 2014**, and is, as of the date of this certificate, a(n) **Active lawyer** of the Washington State Bar Association who is **Eligible** to practice law in this state as a lawyer.

This certificate reflects the date of admission or licensure and the license status as of the date stated. Historical information about status, including periods on inactive status, administrative and disciplinary suspensions, disbarments, resignations, etc., are not reflected in this information, but are available through a Status History Certificate. A summary of confidential grievances and public discipline imposed is available, if authorized by the member, through a Discipline History Certificate.



Terra Nevitt
Interim Executive Director

Washington State Bar Association
1325 Fourth Ave, Suite 600
Seattle, WA 98101-2539
206-443-WSBA



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

Linda Sharon Wendell Hsu

was duly qualified and admitted on **April 1, 2013** as an attorney and counselor entitled to
practice before this Court; and is, on the date indicated below, an **Inactive** 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 November 12, 2019.

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

Issued By:

AB
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.

1 STAT

2
3 IN THE SUPREME COURT OF NEVADA

4 Case No. 79130

5
6 Nautilus Insurance Company

7 vs.

8 Access Medical, LLC

9 _____ /
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: 11/4/2019

2. APPLYING ATTORNEY: Linda Sharon Wendell Hsu, Esq.

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1 3. FIRM NAME AND ADDRESS: Selman Breitman, LLP, 33 New Montgomery,
2 Sixth Floor, San Francisco, CA 94105

3 4. NEVADA COUNSEL OF RECORD: Gil Glancz, Esq., Selman Breitman,
4 LLP, 3993 Howard Hughes Pkwy., Suite 200, Las Vegas, NV 89169

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

7 DATED this November 15, 2019

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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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