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9 *Attorneys for Proposed Intervenor-Respondents*
RISE, Institute for a Progressive Nevada, and
10 *the Nevada Alliance for Retired Americans*

11 **IN THE FIRST JUDICIAL DISTRICT COURT**
12 **OF THE STATE OF NEVADA IN AND FOR CARSON CITY**

14 CITIZEN OUTREACH FOUNDATION,
CHARLES MUTH, individually,

15 Petitioners,

16 vs.

17 SCOTT HOEN, in his official capacity as the
18 Carson City Clerk, and JIM HINDLE, in his
official capacity as the Storey County Clerk,

19 Respondents,

Case No.: 24 EW 00020 1B

Dept. No.: I

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22 **MOTION FOR ORDER SHORTENING TIME**

23 On or about September 27, 2024, Proposed Intervenor-Respondents RISE, Institute for a
24 Progressive Nevada, and the Nevada Alliance for Retired Americans (“Proposed Intervenor-”)
25 filed a motion to intervene of right, pursuant to NRCPC 24(a)(1). Here, the Proposed Intervenor-
26 move the Court for an order shortening the time in which to consider the intervention motion. The
27 declaration of Daniel Bravo, Esq. herein and the included proposed order shortening time support
28 this motion.

1 Petitioners seek writ of mandamus and an emergency injunction from this Court to upend
2 Nevada's established voter-challenge rules by requiring Respondents to process hundreds of
3 improper voter challenges in Carson City and Storey County—and thousands more across the
4 state—in the middle of this year's general election: after military and overseas ballots have already
5 been mailed, while mail ballots are being delivered to Nevada residents located out-of-state, and
6 just weeks before mail ballots are sent to every registered Nevada voter who has not opted out and
7 the start of early voting. On September 23, 2024, this Court ordered the Clerks to respond to the
8 Writ of Mandamus on or before October 23, 2024. Given the compressed briefing schedule, as
9 well as the subject matter and prayer for relief contained in the Writ of Mandamus, the need for
10 expedited treatment of the intervention motion is manifest.

11 **AFFIRMATION**

12 The undersigned hereby affirm that the foregoing document does not contain the social
13 security number of any person.

14 DATED this 26th day of September, 2024.

15 **BRAVO SCHRAGER LLP**

16
17 By: 

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25 *Attorneys for Proposed Intervenor-Respondents*
26 *RISE, Institute for a Progressive Nevada, and*
27 *the Nevada Alliance for Retired Americans*
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1 **DECLARATION OF DANIEL BRAVO IN SUPPORT OF MOTION**
2 **TO INTERVENE ON ORDER SHORTENING TIME**

3 I, Daniel Bravo, declare as follows:

4 1. I am duly admitted to practice law in the state of Nevada and am a partner with the
5 law firm Bravo Schragger LLP, counsel for Proposed Intervenor-Respondents RISE, Institute for a
6 Progressive Nevada, and the Nevada Alliance for Retired Americans (“Proposed Intervenors”).

7 2. I make this Declaration of personal, firsthand knowledge and, if called and sworn
8 as a witness, I could and would testify competently thereto. I have personal knowledge of the facts
9 stated herein.

10 3. I make this Declaration in support of Proposed Intervenors’ Motion for Order
11 Shortening Time for the Court to consider Proposed Intervenors’ Motion to Intervene (the “Motion
12 to Intervene”).

13 4. Pursuant to 1st Judicial District Rule 3.7(b), I conferred with counsel to Petitioners
14 and Respondents on September 26 by telephone and/or email. Petitioners did not respond.
15 Respondent Hoen did not object to intervention. Respondent Hindle did not object to intervention.

16 5. On or about September 27, 2024, Proposed Intervenors filed a Motion to Intervene,
17 pursuant to NRCP 24(a)(1).

18 6. Shortening time for the Court to adjudicate the Motion to Intervene is appropriate.
19 The Court’s typical practice would result in the Motion to Intervene being adjudicated within 30–
20 45 days of its filing (i.e., in Late-October to Mid-November 2024). This would leave Motion to
21 Intervene with no time to intervene as a defendant in the above-titled action and oppose Petitioners’
22 Writ of Mandamus and to be expected motion for a preliminary injunction.

23 7. Petitioners seek writ of mandamus and an emergency injunction from this Court to
24 compel the Carson City and Storey County Clerks (“Clerks”) to perform their duties as required
25 by NRS 293.535 and NRS 293.530.

26 8. On September 23, 2024, this Court order the Clerks to respond to the Writ of
27 Mandamus on or before October 23, 2024.

28 9. On September 26, 2022, my office sent Plaintiffs’ counsel an email correspondence

1 informing them that we would be filing this motion for order shortening the time for the Court to
2 resolve the Motion to Intervene, and that we will forward copies of any filings in this regard
3 promptly.

4 10. Considering the foregoing, good cause exists to hear the Motion to Intervene on
5 shortened time, and no prejudice arises from requiring the Motion to Intervene to be considered
6 on shortened time.

7 I declare under penalty of perjury that the foregoing is true and correct to the best of my
8 knowledge.

9 Executed this 26th day of September, 2024.

10 By: 
11 DANIEL BRAVO (SBN 13078)

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**IN THE FIRST JUDICIAL DISTRICT COURT
OF THE STATE OF NEVADA IN AND FOR CARSON CITY**

CITIZEN OUTREACH FOUNDATION,
CHARLES MUTH, individually,

Petitioners,

vs.

SCOTT HOEN, in his official capacity as the
Carson City Clerk, and JIM HINDLE, in his
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Respondents,

Case No.: 24 EW 00020 1B

Dept. No.: I

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ORDER SHORTENING TIME

After considering the Declaration of Daniel Bravo, Esq., and good cause appearing, the Court grants the Order Shortening Time and sets **MOTION TO INTERVENE** for hearing on the _____ day of _____, 2024, at _____m. or as soon thereafter as the Court deems necessary.

Proposed Intervenors shall serve this order upon all parties immediately by electronic filing, and shall also email courtesy copies to counsel of record. All other parties shall have until 5 p.m. on _____, 2024, to file an opposition to the motion, if any. If time permits, Proposed Intervenors may file a reply.

DATED this _____ day of _____, 2024.

DISTRICT COURT JUDGE

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 26th day of September, 2024, a true and correct
3 copy of the foregoing **Motion for Order Shortening Time** was served via U.S.P.S.
4 postage pre-paid, Las Vegas, Nevada as follows:

5 David C. O'Mara, Esq.
6 **THE O'MARA LAW FIRM, P.C.**
7 311 E. Liberty Street
8 Reno, Nevada 89501

9 *Attorney for Petitioners*

10 Julie Harkleroad
11 Judicial Assistant to
12 Hon. James T. Russell
13 First Judicial District Court, Dept. I

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Jim Hindle

14
15 By: *Dannielle Fresquez*
16 Dannielle Fresquez, an Employee of
17 BRAVO SCHRAGER LLP
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