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

12 **SECOND JUDICIAL DISTRICT COURT**
13 **IN AND FOR WASHOE COUNTY, STATE OF NEVADA**

14 CITIZEN OUTREACH FOUNDATION,
15 CHARLES MUTH, individually,

16 Petitioners,

17 v.

18 CARRE-ANN BURGESS, in her official
19 capacity as the acting Registrar of Voters, for
Washoe County,

20 Respondent.

Case No.: CV24-02182
Dept. No.: 3

**MOTION FOR ORDER
SHORTENING TIME**

22 Proposed Intervenor-Respondents RISE, Institute for a Progressive Nevada, and the
23 Nevada Alliance for Retired Americans (“Proposed Intervenor”), by and through their attorneys,
24 move the Court for an order shortening the time in which to consider Proposed Intervenor’s Motion
25 to Intervene (filed Sept. 27, 2024). The declaration of Daniel Bravo, Esq. herein supports this
26 motion.

27 Petitioners seek writ of mandamus and an emergency injunction from this Court to upend
28

1 Nevada’s established voter-challenge rules by requiring Respondent to process hundreds of
2 improper voter challenges in Washoe County—and thousands more across the state—in the middle
3 of this year’s general election: after military and overseas ballots have already been mailed, while
4 mail ballots are being delivered to Nevada residents located out-of-state, and just weeks before
5 mail ballots are sent to every registered Nevada voter who has not opted out and the start of early
6 voting. Shortening time for the Court to adjudicate the Motion to Intervene is appropriate.

7 The Court’s typical practice would result in the Motion to Intervene being adjudicated
8 within 30–45 days of its filing (i.e., in late-October to mid-November 2024). This would leave
9 Motion to Intervene with no time to intervene in the above-titled action and oppose Petitioners’
10 Writ of Mandamus. Given the compressed schedule, as well as the subject matter and prayer for
11 relief contained in the Writ of Mandamus, the need for expedited treatment of the intervention
12 motion is manifest.

13 **AFFIRMATION**

14 Pursuant to NRS 239B.030 and 603A.040, the undersigned does hereby affirm that this
15 document does not contain the personal information of any person.

16 DATED this 27th day of September, 2024.

17 By: /s/ Bradley Schrager

18 Bradley S. Schrager (NV Bar No. 13078)
19 Daniel Bravo (NV Bar No. 10217)
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28 *Respondents RISE, Institute for a Progressive*
Nevada, and the Nevada Alliance for Retired
Americans

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 Interveners”).

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 Interveners’ Motion for Order
11 Shortening Time for the Court to consider Proposed Interveners’ Motion to Intervene (the “Motion
12 to Intervene”).

13 4. On or about September 27, 2024, Proposed Interveners filed a Motion to Intervene,
14 pursuant to NRCP 24(a)(1).

15 5. Shortening time for the Court to adjudicate the Motion to Intervene is appropriate.
16 The Court’s typical practice would result in the Motion to Intervene being adjudicated within 30–
17 45 days of its filing (i.e., in late-October to mid-November 2024). This would leave Motion to
18 Intervene with no time to intervene in the above-titled action and oppose Petitioners’ Writ of
19 Mandamus.

20 6. Petitioners seek writ of mandamus and an emergency injunction from this Court to
21 compel the Washoe County Clerk to perform her duties as required by NRS 293.535 and
22 NRS 293.530.

23 7. Considering the foregoing, good cause exists to hear the Motion to Intervene on
24 shortened time, and no prejudice arises from requiring the Motion to Intervene to be considered
25 on shortened time.

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27 ///

28 ///

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

3 Executed this 27th day of September, 2024.

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5 By: /s/ Daniel Bravo
6 DANIEL BRAVO (SBN 13078)

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 27th day of September, 2024, a true and correct copy of the
3 foregoing **Motion for Order Shortening Time** was served via the Washoe County E-Flex Filing
4 System on all parties or persons requesting notice.

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6 By: /s/ Danielle Fresquez
7 Danielle Fresquez, an Employee of
8 BRAVO SCHRAGER LLP
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