

1 SADMIRA RAMIC
Nevada Bar No.: 15984
2 CHRISTOPHER M. PETERSON
Nevada Bar No. 13932
3 **AMERICAN CIVIL LIBERTIES**
UNION OF NEVADA
4362 W. Cheyenne Ave.
4 North Las Vegas, NV 89032
Telephone: (702) 366-1226
5 Facsimile: (702) 830-9205
Email: ramic@aclunv.org
6

7 JONATHAN TOPAZ (*pro hac vice forthcoming*)
New York Bar No. 5671151
8 **AMERICAN CIVIL LIBERTIES**
UNION FOUNDATION
125 Broad St. 18th Floor
9 New York, NY 10004
Telephone: (212) 549-2500
10 Email: jtopaz@aclu.org

11 *Attorneys for Proposed Intervenor*
12 *ACLU of Nevada*

13 **IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
14 **IN AND FOR THE COUNTY OF WASHOE**

15 CITIZEN OUTREACH FOUNDATION,
16 CHARLES MUTH, individually,

17 Petitioners,

18 vs.

19 CARI-ANN BURGESS, in her official capacity as
the Washoe County Interim Registrar of Voters,

20 Respondent.

Case No.: CV24-02182

Department: 3

21
22 **ACLU OF NEVADA'S MOTION FOR ORDER SHORTENING TIME**

23 Pursuant to WDCR 11, Proposed Intervenor-Respondent American Civil Liberties Union
24 of Nevada ("ACLUNV"), by and through counsel, Sadmira Ramic, Esq., submits this Motion for
25 Order Shortening Time to respond to ACLUNV's Motion to Intervene as Respondent filed on
26 September 28, 2024. This Motion is made and based upon the declaration of Sadmira Ramic, Esq.,
27 attached hereto as Exhibit 1, and the papers and pleadings on file in this matter.

1 On Friday, September 23, 2024, Petitioners Citizen Outreach Foundation and Charles Muth
2 filed a Petition for Writ of Mandamus Pursuant to NRS 293.535 and NRS 293.530 for Respondents
3 to Notify the Registrant of the Challenge and Follow the Requirements of NRS 293.530
4 (“Petition”). ACLUNV learned through this litigation that “[a]s of August 28, 2024, Petitioner
5 Muth filed in Washoe County, Eleven Thousand Sixty Three (11,063) affidavits challenging the
6 registrants pursuant to NRS 293.495.”

7 On September 26, 2024, Petitioners filed a Motion for Preliminary Injunction and to
8 Advance the Trial on the Merits (“Preliminary Injunction Motion”). The Preliminary Injunction
9 Motion explains that Petitioners will (1) file an ex parte motion for order shortening time, and (2)
10 seek to advance the matter on its merits when a hearing is schedule on the preliminary injunction.
11 Prelim. Inj. Mot. at 1.

12 On September 28, 2024, American Civil Liberties Union of Nevada (“ACLUNV”) filed a
13 motion to intervene as of right as a Respondent under Nevada Rule of Civil Procedure 24(a)(2) or
14 in the alternative, permissive intervention pursuant to Rule 24(b), on behalf of itself and its affected
15 members in Washoe County. Petitioners have filed voter challenges against several of ACLUNV’s
16 own members in Washoe County, and possibly others, on the basis of a name match in the National
17 Change of Address (“NCOA”) database.

18 Good cause exists to shorten the time for resolving ACLUNV’s Motion to Intervene as
19 Respondent. ACLU of Nevada’s members are being significantly impacted by this litigation and
20 face an imminent risk of being disenfranchised ahead of the fast-approaching 2024 General
21 Election. Additionally, the Petitioners are requesting an expedited briefing schedule and have
22 stated that they will be filing an ex-parte motion for order shortening time and will be seeking to
23 advance the matter on its merits when a hearing is scheduled on the preliminary injunction.
24 ACLUNV has a significant interest in this litigation and anticipates opposing the preliminary
25 injunction motion to protect its interest and those of its members.

1 **AFFIRMATION**

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

4
5 DATED this 28th day of September, 2024.

6
7 */s/ Sadmira Ramic*
8 SADMIRA RAMIC, ESQ.
9 Nevada Bar No. 15984
10 **AMERICAN CIVIL LIBERTIES**
11 **UNION OF NEVADA**
12 4362 W. Cheyenne Ave.
13 North Las Vegas, NV 89032
14 Telephone: (702) 366-1226
15 Facsimile: (702) 366-1331
16 Email: ramic@aclunv.org

17 */s/ Jonathan Topaz*
18 JONATHAN TOPAZ*
19 New York Bar No. 5671151
20 **AMERICAN CIVIL LIBERTIES**
21 **UNION FOUNDATION**
22 125 Broad St. 18th Floor
23 New York, NY 10004
24 Telephone: (212) 549-2500
25 Email: jtopaz@aclu.org

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27 *ACLU of Nevada*

**application for admission pro hac
vice forthcoming*

INDEX OF EXHIBITS

Exhibit No.	Description	Number of Pages
1	Declaration of Sadmira Ramic	2

DATED this 28th day of September 2024

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DECLARATION OF SADMIRA RAMIC, ESQ.

I, Sadmira Ramic, Esq., under penalty of perjury declare:

1. I am over 18 years of age and competent to testify.
2. I am the Voting Rights Attorney of the American Civil Liberties Union of Nevada.
3. I make this Declaration in support of Proposed Intervenor’s Motion for Order Shortening Time for the Court to consider Proposed Intervenor’s Motion to Intervene (the “Motion to Intervene”).
4. On September 28, 2024, Proposed Intervenor filed a Motion to Intervene, pursuant to NRCPC 24(a)(1) and NRCPC 24 (b).
5. I am counsel of record for Proposed Intervenor, ACLU of Nevada.
6. Good cause exists to hear the Motion to Intervene on shortened time.
7. Petitioners have challenged several of ACLUNV’s own members in Washoe County, and they face an imminent risk of being disenfranchised ahead of the 2024 General Election, which begins just weeks from now.
8. Petitioners have requested an expedited briefing schedule and have filed a motion for a preliminary injunction.
9. As such, no prejudice arises from requiring the Motion to Intervene to be considered on shortened time.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated September 28, 2024 – Executed in Clark County, Nevada.

3
4 /s/ Sadmira Ramic
5 SADMIRA RAMIC, ESQ.
6 Nevada Bar No. 15984
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CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2024, I electronically filed the foregoing **ACLU OF NEVADA'S MOTION FOR ORDER SHORTENING TIME** with the Second Judicial District Court using the E-flex system.

Participants in the case who are registered with this Court's electronic filing system will receive notice that the document has been filed and is available on the court's electronic filing system. To my knowledge, all parties in this matter are registered with this Court's electronic filing system.

/s/ Sadmira Ramic
An employee of the ACLU of Nevada

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