



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 SARA WORTH (*pro hac vice forthcoming*)
California Bar No.: 341088
8 **AMERICAN CIVIL LIBERTIES**
UNION FOUNDATION
125 Broad St. 18th Floor
9 New York, NY 10004
Telephone: (212) 549-2500
10 Email: vrp_sw@aclu.org

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

13 **IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
14 **IN AND FOR THE COUNTY OF CLARK**

15 CITIZEN OUTREACH FOUNDATION,
16 CHARLES MUTH, individually,

17 Petitioners,

18 vs.

19 LORENA PORTILLO in her official capacity as the
acting Registrar of Voters, for Clark County,

20 Respondent.
21

Case No.: A-24-902351-W

Department: 28

22 **ACLU OF NEVADA’S MOTION FOR ORDER SHORTENING TIME**

23 Proposed Intervenor-Respondent American Civil Liberties Union of Nevada
24 (“ACLUNV”), by and through counsel, Sadmira Ramic, Esq., submits this Motion for Order
25 Shortening Time to respond to ACLUNV’s Motion to Intervene as Respondent filed on October
26 2, 2024. This Motion is made and based upon the declaration of Sadmira Ramic, Esq., attached
27 hereto as Exhibit 1, and the papers and pleadings on file in this matter.

1 On September 23, 2024, Petitioners, Citizen Outreach Foundation and Charles Muth filed
2 a Petition for Writ of Mandamus Pursuant to NRS 293.535 and NRS 293.530 for Respondents to
3 Notify the Registrant of the Challenge and Follow the Requirements of NRS 293.530 (“Petition”).
4 ACLUNV learned through this litigation that “[a]s of August 28, 2024, Petitioner Muth filed in
5 Clark County, Nineteen Thousand Seven Hundred Forty (19,740) affidavits challenging the
6 registrants pursuant to NRS 293.495.”

7
8 It appears that Petitioners filed an ex parte Motion for Preliminary Injunction and to
9 Advance the Trial on the Merits (“Preliminary Injunction Motion”). The Preliminary Injunction
10 Motion seeks an order to shorten time and an expedited briefing schedule. Prelim. Inj. Mot. at 1.
11 A hearing date on the motion has been set for October 10, 2024 in chambers.

12 On October 2, 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 Clark County. Petitioners have challenged several of ACLUNV’s own members in
16 Clark County, and possibly others, on the basis of a name match in the National Change of Address
17 (“NCOA”) database.
18

19 Good cause exists to shorten the time for resolving ACLUNV’s Motion to Intervene as
20 Respondent. ACLU of Nevada’s members are being significantly impacted by this litigation and
21 face an imminent risk of being disenfranchised ahead of the fast-approaching 2024 General
22 Election. Additionally, the Petitioners are requesting an expedited briefing schedule and have filed
23 an ex-parte motion for order shortening time. ACLUNV has a significant interest in this litigation
24 and anticipates opposing the preliminary injunction motion to protect its interest and those of its
25 members.
26
27

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 2nd day of October, 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/ Sara Worth*
18 SARA WORTH*
19 California Bar No. 341088
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: vrp_SW@aclu.org

26 *Attorneys for Proposed Intervenor*
27 *ACLU of Nevada*

**application for admission pro hac
vice forthcoming*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on October 2, 2024, I electronically filed the foregoing **ACLU OF**
3 **NEVADA'S MOTION FOR ORDER SHORTENING TIME** with the Eighth Judicial District
4 Court using the e-filing system.
5

6 Participants in the case who are registered with this Court's electronic filing system will
7 receive notice that the document has been filed and is available on the court's electronic filing
8 system. To my knowledge, all parties in this matter are registered with this Court's electronic filing
9 system.
10

11 */s/ Sadmira Ramic*
12 An employee of the ACLU of Nevada
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

INDEX OF EXHIBITS

| Exhibit No. | Description | Number of Pages |
|--------------------|------------------------------|------------------------|
| 1 | Declaration of Sadmira Ramic | 1 |

DATED this 2nd day of October 2024

EXHIBIT 1

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 Intervenors’ Motion for Order Shortening Time for the Court to consider Proposed Intervenors’ Motion to Intervene (the “Motion to Intervene”).
4. On October 2, 2024, Proposed Intervenors filed a Motion to Intervene, pursuant to NRCPC 24(a)(1) and NRCPC 24 (b).
5. I am counsel of record for Proposed Intervenors, 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 Clark 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. A hearing on the motion for a preliminary injunction is set for October 10, 2024.
10. As such, no prejudice arises from requiring the Motion to Intervene to be considered on shortened time.

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

Dated October 1, 2024 – Executed in Clark County, Nevada.

/s/ Sadmira Ramic
SADMIRA RAMIC, ESQ.
Nevada Bar No. 15984