

COMMISSION ON JUDICIAL SELECTION APPLICATION

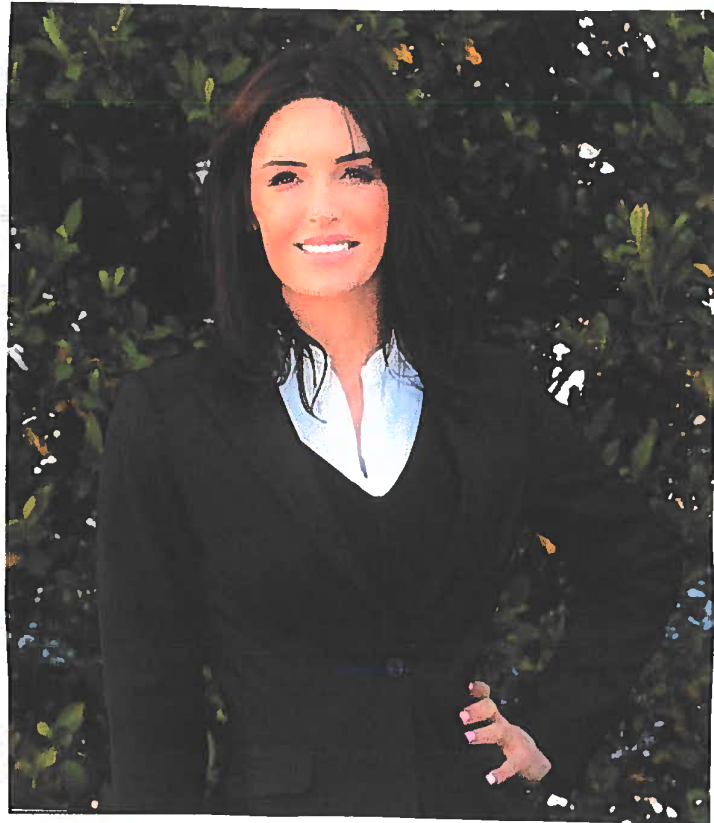
EIGHTH JUDICIAL DISTRICT
DEPARTMENT VII

Replace the highlighted spaces on this page with the vacancy you seek to fill
VII

Candidates may only choose one department and may not withdraw to apply for another department within this selection period

By

(NADINE M. MORTON)



Personal Information

1.	Full Name	Nadine Marie Morton
2.	Have you ever used or been known by any other legal name (including a maiden name)? If so, state name and reason for the name change and years used.	Yes; I used the last name Morton-Myles from 2005 to 2013 due to marriage. The Court restored my maiden name "Morton" when it dissolve the marriage.
3.	How long have you been a continuous resident of Nevada?	I have continuously resided in Nevada since 1990 (~31 years.)
4.	City and county of residence	Las Vegas, Nevada
5.	Age	52

Employment History

6. Please start with your current employment or most recent employment, self-employment, and periods of unemployment for the last 20 years preceding the filing of this Application.

Current or Last Employer	Morton Law, PLLC
Phone	702-718-3000
Physical Address & Website	2655 South Rainbow Blvd., Las Vegas, Nevada 89146 www.mortonlawnv.com
Date(s) of Employment	09/2011-Present
Supervisor's Name and Title	Nadine M. Morton, Owner
Your Title	Owner
Describe Your Key Duties	<p>Advise, counsel and represent clients in all areas of criminal law and stages including preliminary hearings, jury trials, bench trials, sentencings, probation revocations, and motion hearings. Represent clients in all specialty courts, including, but not limited to the following: Felony DUI Court, Drug Court, Veteran's Treatment Court, Mental Health Court, OPEN Program, and Competency Court. Manage, develop and supervise all cases and presentations, which includes interviewing witnesses, consulting with experts. conducting jury selection, cross and direct examination. Performs legal research, drafts and files pleadings, handles all aspects of discovery and motion practice.</p> <p>Contract Counsel for Nye County Fifth Judicial District; Appointed Counsel to represent indigent clients in all criminal cases, including Category A through E felonies, gross misdemeanors, and misdemeanors. Deemed death qualified. Represent juvenile delinquency cases and department of child</p>

	<p>and family services cases. Represents clients in all appellate matters, including, but not limited to writs of mandamus and writs of habeas corpus.</p> <p>Contract Counsel for Clark County Eighth Judicial District; Appointed Counsel to represent indigent clients. Contracted to represent indigent clients in Category A, B, C, D, and E felonies and all misdemeanors. Contracted and retained to represent clients in probation and parole revocations. Contracted to represent clients in post-conviction relief.</p> <p>Contract Counsel for Douglas County Ninth Judicial District; Appointed Counsel to represent indigent clients in all criminal cases, including Category A through E felonies, gross misdemeanors, and misdemeanors. Deemed death qualified. Represent juvenile delinquency cases and department of child and family services cases. Represents clients in all appellate matters, including, but not limited to writs of mandamus and writs of habeas corpus.</p> <p>Arbitrator for Clark County Court-Annexed Arbitration Program, a program requiring that almost all claims valued at \$50,000 or less must be arbitrated prior to trial.</p> <p>Lead counsel in complex criminal and civil litigation including more than jury trials and multiple non-jury trials.</p> <p>Represents government officials in internal affairs investigations and employment hearings.</p> <p>Represent clients in civil matters, including land development, employment law matters, equal opportunity housing issues. Provides sound, well-reasoned legal advice to businesses to ensure compliance with the law and accomplishment of my clients' goals.</p>
Reason for Leaving	Currently employed at Morton Law, PLLC

Previous Employer	GKS Development, Inc.
Phone	702-364-8027
Address & Website	2655 S. Rainbow Blvd., #401, Las Vegas, Nevada 89146 www.Gksseniorliving.com
Date(s) of Employment	7/2020-1/2021
Supervisor's Name and Title	George Gekakis, Owner
Your Title	In-House Counsel
Describe Your Key Duties	Represents GKS and GGI in the development and management of affordable senior housing. Advises, counsels and represents

	in both transactional and litigation matters, including drafting real estate agreements, conducting legal research regarding zoning, and ensuring compliance with ordinances and regulations. Represents client in matters of employment matters and equal opportunity housing hearings.
Reason for Leaving	My position was more fiscally beneficial for the company as outside retained counsel, rather than in-house counsel. Although I still perform legal services for GKS, it is in the capacity as retained outside counsel, rather than as a W2 employee of GKS.

Previous Employer	Huang and Associates
Phone	702-433-8080
Address & Website	4840 E. Bonanza Road, Las Vegas, Nevada www.kellyhuanglawvegas.wordpress.com
Date(s) of Employment	1-2020 - 7/2020
Supervisor's Name and Title	Kelly Huang, Owner
Your Title	Associate
Describe Your Key Duties	Represented clients in personal injury matters. Drafted briefs, pleadings, and demand letters. Performed legal research, and handled all aspects of discovery. Conducted pre-litigation negotiations with insurance companies. Resolved multiple cases through negotiations. Worked on a wide variety of pre-litigation and counseling matters, including day-to-day communications with clients, insurance companies, and opposing counsel.
Reason for Leaving	Offered opportunity as in-house counsel for a developer and to manage my law firm.

Previous Employer	Weiner Law Group
Phone	702-202-0500
Address & Website	2820 W. Charleston Blvd, #35, Las Vegas, NV 89102 www.weinerlawnevada.com
Date(s) of Employment	7-2019 - 1/2020

Supervisor's Name and Title	Jason Weiner, Owner
Your Title	Associate
Describe Your Key Duties	Represented clients in litigations matters. Conducted depositions, drafted briefs and pleadings, performed legal research, and handled all aspects of discovery. Conducted depositions and represented clients in mediation and trials. Worked on a wide variety of litigation and counseling matters, including day-to-day communications with clients and opposing counsel.
Reason for Leaving	Offered opportunity to be a part of a burgeoning law firm

Previous Employer	Clark County Public Defender's Office
Phone	702-455-4685
Address & Website	309 S. Third Street, Las Vegas, Nevada www.clarkcountynv.gov
Date(s) of Employment	10/2004 – 1/2011
Supervisor's Name and Title	Dianne Dickson, Chief Public Defender
Your Title	Senior Deputy Public Defender
Describe Your Key Duties	<p>Lead attorney in complex jury trials with multiple defendants and offenses. Organized, executed, and coordinated a defense, ensuring the tenets of a fair democratic system. Represented clients at all stages of legal proceedings, including direct and cross examination, and drafting legal motions.</p> <p>Conducted more than twenty trials attorney with notable record of success.</p> <p>Researched and litigated complex legal issues before Nevada Supreme Court on multiple cases.</p> <p>Advanced to Senior Attorney for demonstrated success within litigation and trial law. Consulted with expert witnesses, investigators and witnesses for the presentation of testimony.</p> <p>Used extensive knowledge of Nevada legal system to develop and deliver formal presentations to jury and the courts.</p> <p>Conducted conflict checks on former clients, current clients, and witnesses. Litigated the <i>Bruton</i> Rule and drafted severance motions and preserved issue for appellate litigation.</p>

Reason for Leaving	I went into private practice and open my own law firm.

Previous Employer	Woods, Erickson, Whitaker & Miles
Phone	702-433-9696
Address & Website	1349 Galleria Drive, #200, Henderson, Nevada 89014 www.ericksonwhitaker.com
Date(s) of Employment	11/2004-1/2005
Supervisor's Name and Title	Glen Woods, Partner
Your Title	Associate
Describe Your Key Duties	Provide business and personal legal services in the area of federal, state and local taxation matters, real estate, trust and estate planning. Conducted depositions, drafted briefs and pleadings, performed legal research, and handled all aspects of discovery. Worked on a wide variety of litigation and counseling matters, including day-to-day communications with clients and opposing counsel. Advocated for clients in judicial hearings.
Reason for Leaving	Offered opportunity to be a trial attorney at the Clark County Public Defender's Office

Previous Employer	Clark County District Attorney's Office, Civil Divisions
Phone	702-671-2599
Address & Website	500 S. Grand Central Pkwy, Las Vegas, Nevada 89155 www.clarkcountynv.gov
Date(s) of Employment	5/20/2022-1/30/2004
Supervisor's Name and Title	Mary Ann Miller, Assistant District Attorney
Your Title	Law Clerk
Describe Your Key Duties	Drafted briefs, memoranda, client letters, and legal opinions. Conducted legal research and investigation for case litigation. Represented LVMPD in employment litigation. Developed team communication memoranda for weekly district attorney meetings.

Reason for Leaving	Opportunity to work at a civil law firm and learn civil litigation and matters of estate planning.

<p align="center">Educational Background</p>

7. List names and addresses of high schools, colleges and graduate schools (other than law school) attended; dates of attendance; certificates or degrees awarded; reason for leaving.

A.J. Dimond High
 2909 W. 88th Avenue
 Anchorage, Alaska
 99502
 8/1984-5/1988
 High School Diploma
 Graduated

University of Nevada, Las Vegas
 4505 S. Maryland Pkwy
 Las Vegas, NV 89154
 5/1/1996-5/2000
 Bachelor of Arts in Communications (cum laude)
 Dean's Honor List 1997-2000
 Graduated

8. Describe significant high school and college activities including extracurricular activities, positions of leadership, special projects that contributed to the learning experience.

Varsity Volleyball, Captain
 Track and Field, State Record in Mile Relay
 Gymnastics, State Finalist
 Homecoming Court
 Midnight Sun Junior National Volleyball
 Polar Smashers Junior National Volleyball

9. List names and addresses of law schools attended; degree and date awarded; your rank in your graduating class; if more than one law school attended, explain reason for change.

William S. Boyd School of Law
 4505 S. Maryland Pkwy
 Las Vegas, Nevada 89154
 Juris Doctorate
 May 2003
 Rank: 23 of 90

1 - 49

10. Indicate whether you were employed during law school, whether the employment was full-time or part-time, the nature of your employment, the name(s) of your employer(s), and dates of employment.

I was employed part time during law school as follows:

Clark County District Attorney's Office, Civil Division
Law clerk
5/20/2002- 1/30/2004

11. Describe significant law school activities including offices held, other leadership positions, clinics participated in, and extracurricular activities.

Judicial Extern for Honorable Philip Pro
Awarded ABA Regional Negotiation Competition, First Place
Awarded ABA National Negotiation Competition, Finalist
Nevada Trial Lawyers' Association, Treasurer
Federalist Society, Member
Client Counseling Competition, Finalist
C.A.L.I. Award (highest grade in the class) for Legal Writing and Research.

Law Practice

12. State the year you were admitted to the Nevada Bar.

September 2003

13. Name states (other than Nevada) where you are or were admitted to practice law and your year of admission.

Not applicable

14. Have you ever been suspended, disbarred, or voluntarily resigned from the practice of law in Nevada or any other state? If so, describe the circumstance, dates, and locations.

No

15. Estimate what percentage of your work over the last five years has involved litigation matters, distinguishing between trial and appellate courts. For judges, answer questions 16-20 for the five years directly preceding your appointment or election to the bench.

96% Litigation
4% Appellate Courts

16. Estimate percentage of time spent on:

Legal Discipline	Percentage of Practice
Domestic/family	10%
Juvenile matters	10%
Trial court civil	0
Appellate civil	0
Trial court criminal	70%
Appellate criminal	4%
Administrative litigation	6%
Other: Please describe	

17. In the past five years, what percentage of your litigation matters involved cases set for jury trials vs. non-jury trials?

50% Jury Trials
50% Non-Jury Trials

18. Give the approximate number of jury cases tried to a conclusion during the past five years with you as lead counsel. Give the approximate number of non-jury cases tried to a decision in the same period.

I have tried one non-jury trial case in the past five years as lead counsel.

I have tried no jury trial cases in the past five years. Although I have a high case load and many cases set for jury trial, all of my jury trial cases have resolved before jury trial. I have developed strong mediation and settlement skills, which I believe would be an asset to our court's settlement program. Mandatory settlement conferences and other forms of alternative dispute resolution not only reduces the costs of litigation, but also enables the court to function efficiently.

19. List courts and counties in any state where you have practiced in the past five years.

- State Courts:
Nevada Supreme Court
Nevada Court of Appeals
Eighth Judicial District Court, Clark County, Nevada
Fifth Judicial District Court, Nye County, Nevada
Ninth Judicial District Court, Douglas County, Nevada
- Federal Courts:
Ninth Circuit Court of Appeals
U.S. District Court for the District of Nevada

20. List by case name and date the five cases of most significance to you (not including cases pending in which you have been involved), complete the following tables:

Case 1
Case name and date: State of Nevada v. David Coleman; C-14-295906; 12/30/2014
Court and presiding judge and all counsel: Eighth Judicial District Court, Judge Delaney
Plaintiff's counsel of record: Jacob Villani, Esq.
Defendant's counsel of record: Nadine Morton, Esq.
Importance of the case to you and the case's impact on you: My client, David Coleman, was charged with a life sentence charge—first degree kidnapping. My client would not accept a plea offer and was committed to his innocence. I filed a pretrial discovery motion requesting the jail calls; however, they were not provided. At trial, my client testified inconsistent with what he said on the jail call. The State tried to introduce the jail calls, but because I had filed a discovery motion the Court prohibited the introduction of the jail calls, which saved my client's life. He was found not guilty. He has stayed out of trouble and turned his life around. The importance of the case to me was that I knew I was an effective advocate by filing the pretrial discovery motion, which saved David Coleman from a life sentence.
The impact on me was great because it strengthened my confidence and gave assurance that I was effectively representing my clients. After the case, I became a clarion call to practitioners regarding the necessity of filing a comprehensive discovery motion. Many cases are reversed on account of the failure to turn over evidence, but it critical to file the request for discovery.
Your role in the case: Lead Counsel

Case 2
Case name and date: State of Nevada v. Christopher Stewart; C-16-315677-3; 8/2017
Court and presiding judge and all counsel: Eighth Judicial District, Judge Herndon
Plaintiff's counsel of record: Hetty Wong, Esq. Jake Merback, Esq.
Defendant's counsel of record:

<p>Nadine Morton, Esq.</p>
<p>Importance of the case to you and the case's impact on you: The case is important because three lives were devastated as a result of the actions of my client. Specifically, the victims had been severely injured physically and psychologically and my client is serving a life sentence. My client was charged with more than ten violent offenses. The prosecution and defense employed more than six expert witness and dealt with issues of DNA and electronic technology. As sole practitioner, the preparation process was very intensive in securing experts and utilizing the expert testimony effectively in conjunction with the cross-examining of the State's expert. The case resonates with me because one of the victims was badly injured and was in the wrong place at the wrong time. She became the victim of a senseless crime and her life will be forever changed. The evidence was overwhelming—video statements, fingerprints, eye witness testimony After a lengthy trial, the jury returned a verdict of guilty on all counts. This case resonates because it felt like a Sisyphus task—no matter how hard my investigator and I worked, the evidence would never weigh in our favor. Nevertheless, we stood strong in the midst of a legal battle.</p> <p>The impact it had on me is affirming my faith in the judicial system. The prosecutors did an incredible job representing the State, Judge Herndon conducted a flawless trial, and my investigator was my strongest ally. I am grateful for being a part of the process.</p>
<p>Your role in the case: Lead counsel</p>

<p>Case 3</p>
<p>Case name and date: State of Nevada v. David Gibbs; C208733; 2/2005</p>
<p>Court and presiding judge and all counsel: Eighth Judicial District Court, Judge Michael Cherry</p> <p>Plaintiff's counsel of record: John Carlo Pesci, Esq.</p> <p>Defendant's counsel of record: Nadine Morton, Esq. Jordan Savage; Esq.</p>
<p>Importance of the case to you and the case's impact on you: This case was important to me because it was my first jury trial and one of the reasons that I went to law school—to become a trial lawyer. Jack McCoy, a character on Law and Order, was my idol and I wanted to be like him—exquisite in the courtroom. I have nostalgia for it because it was conducted in old courthouse, prior to the RJC.</p> <p>Although David Gibbs was only charged with burglary from Walmart—he stole a pair of gloves—he was also facing the habitual criminal treatment, which would result in a sentence of 5-15 years if deemed a habitual criminal. I presented the opening and closing arguments.</p>

<p>The jury returned a guilty verdict; however, Judge Cherry had mercy on him and did <i>not</i> habitualize him. It was a victory.</p> <p>The case was impactful because conducting my first jury trial lived up to all my expectation and made me even more grateful for the opportunity to practice law. My mentor, Jordan Savage, was perfect because he let me handle all of the critical stages of the trial, but was there to provide support and guidance. My legs were shaking during voir dire and opening argument, but grew stronger as I continued.</p>
<p>Your role in the case: Lead Counsel</p>

<p>Case 4</p>
<p>Case name and date: State of Nevada v. Pachalo Chipeta; C-16-315677; 4/2017</p>
<p>Court and presiding judge and all counsel: Eighth Judicial District Court, Judge Togliatti</p> <p>Plaintiff's counsel of record: Richard Scow, Esq. Craig Hendricks, Esq.</p> <p>Defendant's counsel of record: Ed Kane, Esq. Nadine Morton, Esq.</p>
<p>Importance of the case to you and the case's impact on you: This was an important case because it was my first murder trial. Ed Kane was lead counsel and he was extremely experienced, respected and professional. Pachalo Chipeta originated from a tribe in Africa and we tried to have his statement suppressed arguing that he did not fully comprehend English. The suppression hearing was unsuccessful. Ultimately, the jury returned a verdict of first degree murder. Ed Kane has been both a district attorney and public defender. I deem him a legal samurai. I learned how to conduct a murder trial from an experienced attorney.</p> <p>The impact it had on me is the lessons I learned from Judge Togliatti. I committed to modeling my jurisprudence after Judge Togliatti.. Judge Togliatti's performance as a judge was a master class on how to conduct a trial. Judge Togliatti allowed the defense multiple opportunities to have experts and translators from his tribe participate; however, there was no success in obtaining such a translator. She ensured the defense had ample opportunities to provide effective representation. She had the least amount of reversals because she afforded all parties to thoroughly litigated the issues.</p>
<p>Your role in the case: Second Counsel for Defendant</p>

<p>Case 5</p>

Case name and date: The Estate of Jeremiah Bowling v Striemer; Case No.: 2:17-cv-1886; 8/2018
Court and presiding judge and all counsel: Federal District Court, Judge Dorsey
Plaintiff's counsel of record: Nadine Morton, Esq. AJ Sharp, Esq. Defendant's counsel of record: Robert Freeman, Esq.
Importance of the case to you and the case's impact on you: This case is of importance because it involved the death of young man who was murdered by a fellow inmate while in custody. The case was filed in federal district court alleging claims of §1983 Civil Rights violations. Based upon my many years of experience and knowledge of jail protocol, I knew that a legitimate cause of action existed. The case resolved after a lengthy litigation process and the Ninth Circuit rendering a ruling in my clients' favor. Thereafter, the Parties participated in a second mediation and Parties entered into a settlement. It is my understanding that as a result of the case, reformation occurred in the design, procedure and/or protocol of Clark County Detention Center in order to make the facility a safer place for inmates, staff and officers. The case was impactful on me because it was a civil rights case which was a new area of law for me. Civil rights litigation is difficult in which to prevail due to the privilege of qualified immunity. It was also my first substantial case in federal court. The stakes were very high for me because I financed the case entirely from my own earnings. There were many lean times in which I had to engage in other employment opportunities while I litigated the case. But, I believed in the case and ultimately my perseverance was rewarded. My client always stood beside and was able to buy a house for her and her family, which was her dream. Opposing counsel, Robert Freeman, was a fierce opponent, but always professional and respectful. My co-counsel, AJ Sharp, is a brilliant writer. I learned a lot from these two gentleman. I am a better lawyer as a result of the experience. This case was an exercise in faith, persistence, and tenacity.
Your role in the case: Lead Counsel for Plaintiffs

21. Do you now serve, or have you previously served as a mediator, an arbitrator, a part-time or full-time judicial officer, or a quasi-judicial officer? To the extent possible, explain each experience.

Yes

- In 2004, I became an Arbitrator for Clark County Court-Annexed Arbitration Program, a program requiring that almost all claims valued at \$50,000 or less must be arbitrated prior to trial. I presided over multiple arbitration hearings. The experience has provided me with the

opportunity to conduct hearings and employ critical thinking to arrive at an equitable decision.

22. Describe any pro bono or public interest work as an attorney.

I maintain an active pro bono practice. Through my work with Silver State Housing, I represent seniors in need of legal services in social security administration matters and employment matters.

I provided pro bono services through my law firm to individuals in all matters, including, but not limited to the following: records sealing, bench warrants quashed, placement of cases on calendar for discharge from probation, personal injury matters, and business disputes.

I have also provided pro bono services through the Legal Aid of Southern Nevada.

23. List all bar associations and professional societies of which you are or have been a member. Give titles and dates of offices held. List chairs or committees in such groups you believe to be of significance. Exclude information regarding your political affiliation.

American Bar Association
Nevada Bar Association
Clark County Bar Association
Douglas County Bar Association
Washoe Bar Association

24. List all courses, seminars, or institutes you have attended relating to continuing legal education during the past five years. Are you in compliance with the continuing legal education requirements applicable to you as a lawyer or judge?

Yes. I am in compliance with the continuing legal education requirements. In the last 5 years, I have attended the following courses, seminars, and/or institutes related to continuing legal education:

- Organizing Homicide File
- Investigating the Scene of the Alleged Crime
- No One Makes It Out Unscathed: The Effects of Trauma, Stress and Burnout On Our Lives
- Ethics of Legal Writing
- The Ethics and Art of Settlement at Mediation
- Litigating False Claims Act Cases
- Recent Trademark Decisions Practitioners Should Know About
- An Introduction to Chapter 7 Bankruptcy Basics
- The New Infrastructure Bill and Your Need to Understand Design-Build and Engineer Procure Construct Projects

- What Happens To Your Practice If You Die Or Become Disabled
- Building a Successful Solo Mergers and Acquisitions Practice
- Cyber Security Compliance Trifecta: Recent Revisions to Three Important Security and Privacy Standards
- Unfair, Deceptive, or Abusive Acts or Practices: “I’ll Know It When I See It…”
- NFT’s: A survey of Intellectual Property Issues
- Phenomenal Support Is Included At No Additional Cost
- Drafting and Responding to Powerful Demand Letters
- The Complex Homicide Prosecution: A Case Study of the Trial of Ted B
- Representing Veterans in Criminal Court
- Stepping Up: Representing Parents with Minor Children
- Nobody is Above the Law: Criminal Procedures Regarding Interrogation
- Criminal Defense Strategies: How Form Prosecutors Use Mitigation
- Compassionate Release: Covid-19 Effects On The Criminal Justice System
- Nuts and Bolts of Immigration Law for Criminal Defense Attorneys
- Ethical Considerations in Conducting Investigations
- 25 is the new 18: Protecting Emerging Adult Clients
- Gambling: The Secret Addiction
- Managing and Valuing Tangible Personal Property in Estates
- Representing the Founders and Initial Investors in a Startup Technology
- A Hundred Little Things Negotiating Commercial Real Estate Leases
- The Ethics of Cannabis Law
- Estate Administration, Estate Planning and Lien Resolution Basics
- Practicing Law in a Pandemic: Remote Lawyering in the Age of Covid
- Bankruptcy 101: Chapter 7 and Chapter 13
- Cannabis Regulation 101: An overview of licensing Regulations
- ERISA for Dummies
- Acquisitions of Insurance Businesses
- Advising Clients on Contractual Concessions Leveraging Force Majeur
- Marijuana & Hemp: How Did We Get Here & Where Are We Going?
- The Realities of Mental Health and Substance Abuse
- The Ethics Gameshow
- Speaking the Language of Gambling: Psychological and Legal
- Bringing Sports and Entertainment to Las Vegas
- First Step Act: What you Need to Know
- Record Sealing and Immigration Implications
- Stress and Substance Abuse in the Legal Profession
- Creating Change and Thriving as a Civil Rights Lawyer
- Nevada Supreme Court Criminal Reported Decisions
- Club X—Disclosure of Damages, Claims and Expert Witnesses
- Arbitrator Training and Refresher
- NJA Annual Convention and Seminar

25. Do you have Professional Liability Insurance or do you work for a governmental agency?

Yes. I hold professional liability insurance through my firm, Morton Law, PLLC.

Business & Occupational Experience

26. Have you ever been engaged in any occupation, business, or profession other than a judicial officer or the practice of law? If yes, please list, including the dates of your involvement with the occupation, business, or profession.

27. Do you currently serve or have you in the past served as a manager, officer, or director of any business enterprise, including a law practice? If so, please provide details as to:

I am the owner of the law firm Morton Law, PLLC

a. the nature of the business

Morton Law, PLLC is a law firm

b. the nature of your duties

As owner of Morton Law, PLLC, my obligations—in addition to the practice of law—include ultimate responsibility for the cases on which I work, to include not only the merits of the matter, but also the staff who work on the cases. I am manage all administrative responsibility, such as all billing, insurance, and professional legal requirements.

c. the extent of your involvement in the administration or management of the business

I am solely responsible for all administrative and management of the business.

d. the terms of your service

I am bound by the state and federal laws of the State of Nevada and United States and the State Bar of Nevada Rules. Otherwise, I have autonomy and there no restrictions on the terms of my service.

e. the percentage of your ownership

I own one hundred percent of the business.

28. List experience as an executor, trustee, or in any other fiduciary capacity. Give name, address, position title, nature of your duties, terms of service and, if any, the percentage of your ownership.

Not Applicable.

Civic Professional & Community Involvement

29. Have you ever held an elective or appointive public office in this or any other state?

No

Have you been a candidate for such an office?

No

If so, give details, including the offices involved, whether initially appointed or elected, and the length of service. Exclude political affiliation.

30. State significant activities in which you have taken part, giving dates and offices or leadership positions.

Silver State Housing, Non-Profit Cooperative Corporation Without Stock, President, May 2020-Current. Silver State Housing is a non-profit organization that provides outreach program sand advocacy to seniors.

Chosen For Success, Non-Profit Corporation, January 2019-Current. Chosen for Success is a non-profit organization, which is an organization that helps broad the minds of youth (13-17), young adults (18-24), and adults (25-over) to bring awareness to how their decisions impact them and others. The organization addresses patterns of poverty through self-improvement trainings, pre-vocational skill building, and job placement.

Choice Center Leadership, Coach, 2003-2004. Choice Center teaches emotional intelligence to boost success in life and leadership.

Howard D. McKibben Inn of Court, Barrister, beginning in 2005, Howard D. McKibben Inn is an organization that holds programs and discussions on matters of ethics, skills, and professionalism.

We The People—I have been a judge in We The People, a competition that gives Nevada students an understanding of American democracy, the Constitution and the Bill of Rights.

31. Describe any courses taught at law schools or continuing education programs. Describe any lectures delivered at bar association conferences.

Not Applicable

32. List educational, military service, service to your country, charitable, fraternal and church activities you deem significant. Indicate leadership positions.

My charitable work includes coaching without compensation men and women in Nevada at Choice Center University. I coach individuals on setting goals and being accountable and maintaining a growth mindset. In addition, I assist seniors who are affected with food

insecurities by initiating outreach to Catholic Charities to deliver food and provisions to seniors, Gold Groceries, which delivers non-perishable products and Three Square to all seniors who are homebound. I am involved in the art and craft fairs, yard sales, and bake sales for seniors. I have helped seniors partner with EQUUS-Workforce Solutions, a senior community employment program. I assist seniors in applying for and advocate that seniors receive 24-hour daily bus passes.

33. List honors, prizes, awards, or other forms of recognition.

I was named as an expert on the Delphi Panel. The Delphi Panel was comprised to ensure adequate representation in the rural counties of Nevada.

34. Have you at any time in the last 12 months belonged to, or do you currently belong to, any club or organization that in practice or policy restricts (or restricted during the time of your membership) its membership on the basis of race, religion, creed, national origin or sex? If so, detail the name and nature of the club(s) or organization(s), relevant policies and practices, and whether you intend to continue as a member if you are selected for this vacancy.

No

35. List books, articles, speeches and public statements published, or examples of opinions rendered, with citations and dates.

Not Applicable

36. During the past ten years, have you been registered to vote?

Yes

Have you voted in the general elections held in those years?

Yes

37. List avocational interests and hobbies.

I am committed to staying healthy mentally, spiritually and physically. To ensure health and wellness, I practice yoga, get exercise, and share in community. To be exact, after a long day of work, I play disc golf at Fox Hills Park. On most Sundays, I go for a trail run with my dog around White Rock at Red Rock Canyon. I am a novice tennis player, but enjoy the tennis camaraderie. I am on a co-ed volleyball team that plays league at Desert Breeze Community Center on Tuesday nights. I enjoying thrifting at second hand and vintage stores. I am an avid reader. I started a book club, which is flourishing with seven female attorneys.

My greatest avocational interest and joy is experiencing the healthy development of my twelve year old daughter. She also plays volleyball and is on the honor roll and shares my love of animals and nature. We love to travel. Last summer, we went to Alaska and rode the Alaskan railroad to Kenai Fjords National Park and went kayaking. This summer we went to

Normandy, France and toured the Normandy American Cemetery and Memorial. When we are at home, we enjoy rooting for the home teams—VGK and the Raiders.

Conduct

38. Have you read the Nevada Code of Judicial Conduct and are you able to comply if appointed?
Yes

39. Have you ever been convicted of or formally found to be in violation of federal, state or local law, ordinance or regulation? Provide details of circumstances, charges, and dispositions.
No

40. Have you ever been sanctioned, disciplined, reprimanded, found to have breached an ethics rule or to have acted unprofessionally by any judicial or bar association discipline commission, other professional organization or administrative body or military tribunal? If yes, explain. If the disciplinary action is confidential, please respond to the corresponding question in the confidential section.
No

41. Have you ever been dropped, suspended, disqualified, expelled, dismissed from, or placed on probation at any college, university, professional school or law school for any reason including scholastic, criminal, or moral? If yes, explain.
No

42. Have you ever been refused admission to or been released from any of the armed services for reasons other than honorable discharge? If yes, explain.
No

43. Has a lien ever been asserted against you or any property of yours that was not discharged within 30 days? If yes, explain.
No

44. Has any Bankruptcy Court in a case where you are or were the debtor, entered an order providing a creditor automatic relief from the bankruptcy stay (providing in rem relief) in any present or future bankruptcy case, related to property in which you have an interest?
No

45. Are you aware of anything that may require you to recuse or disqualify yourself from hearing a case if you are appointed to serve as a member of the judiciary? If so, please describe the circumstances where you may be required to recuse or disqualify yourself.

No.

Other

46. If you have previously submitted a questionnaire or Application to this or any other judicial nominating commission, please provide the name of the commission, the approximate date(s) of submission, and the result.

Clark County Judicial Nominating Committee

I submitted my application to the Clark County Judicial Nominating Committee for Justice of the Peace, Department Ten on June 23, 2021. The Judicial Committee appointed Cybil Dobson.

47. In no more than three pages (double spaced) attached to this Application, provide a statement describing what you believe sets you apart from your peers, and explains what education, experience, personality or character traits you possess, or have acquired, that you feel qualify you as a supreme court justice. In so doing, address appellate, civil (including family law matters), and criminal processes (including criminal sentencing).

See Attachment A.

48. Detail any further information relative to your judicial candidacy that you desire to call to the attention of the members of the Commission on Judicial Selection.

I would like to call the Commission's attention to the following information relevant to my judicial candidacy:

First, the American Bar Association Judicial Canon Rule 1.1 states that a judge must have "compliance with the law." I have proven that I can follow the law and successfully carry out my responsibilities and obligations. I am a vetted professional, in which individuals, business owners, and elected officials have entrusted me to protect their precious freedoms and businesses. For more than twenty years, I have proven that I am reliable and will follow the law.

Second, I submit that I have the judicial temperament demanded of a judge. The American Bar Association states that judicial temperament means that a judge exhibits "compassion, decisiveness, open-mindedness, sensitivity, courtesy, patience, freedom from bias and commitment to equal justice." I am have participated in emotional intelligence and leadership training. I have been a coach and through my non-profit work with Chosen for Success taught the five components of emotional intelligence: self-awareness, self-regulation, motivation, social skills, and empathy. Those are the qualities that create judicial temperament. I inhabit those qualities. I have judicial temperament. I submit that my colleagues on both sides of the aisle will attest to my judicial temperament.

Third, the judicial appointment is of the utmost importance. The judiciary is an immense responsibility. People's freedoms, finances, future, and/or families are dependent upon a correct ruling. Thus, rulings matter. When attorneys and litigants appear before me they expect me to correctly apply our laws. I am clear minded and firmly rooted. I am committed to applying the law correctly. And, I am also capable of making the tough calls—the balls and strikes.

Finally, I have worked in the trenches of the Regional Justice Center alongside fellow public defenders and district attorneys. Legal warriors are crafted in that arena. I have developed a strong legal muscle to handle a large caseload efficiently and effectively and thick skin, such that I do not let my ego or that of others get in the way of the performance of my responsibilities. I believe that these qualities will be an asset on the bench. I submit that I am the individual that will best serve Clark County as District Court Judge Department VII.

49. Attach a sample of no more than ten pages of your original writing in the form of a decision, "points and authorities," or appellate brief generated within the past five years, which demonstrates your ability to write in a logical, cohesive, concise, organized, and persuasive fashion.

See Attachment B.

ATTACHMENT A
PERSONAL STATEMENT

ATTACHEMENT A—QUESTION 4—PERSONAL STATEMENT

I am a scholar, a jurist, and a Nevadan. My vision is to safeguard the safety of Nevada and the Constitutional principles of our Country. I am best suited for the position because I focus on the fundamental principles of ensuring that people have faith in the judicial system and that the law is upheld. Additionally, I am the best candidate because I have broad experience in both government and private practice in both criminal and civil litigation. Specifically, I have been a government employee for the Clark County District Attorney Civil Division, Clark County Public Defender, Clark County Arbitrator, and Contract Counsel in Eighth, Fifth and Ninth Judicial Districts, and business owner in private practice and in-house counsel for a land developer, which develops affordable senior housing. I am a vetted professional. Respectfully, I submit that my experience is unparalleled.

In 2000, I graduated from University of Nevada, Las Vegas, receiving my Bachelor of Arts in Corporate Communication, with a minor in English. I excelled in college graduating cum laude and was on Dean's Honor List from 1997 to 2000. I received my Juris Doctorate from the William S. Boyd School of Law in May of 2003. I was part of the burgeoning early years of the Boyd School of Law. I learned from great legal scholars, including Federal Judge Jay Bybee, Federal Judge Bruce Markell, and Professor Carl Tobias. Thereto, I graduated in the top of my class. Multiple times, I received the C.A.L.I. Award (highest grade in the class) for Legal Writing and Research. I am incredibly honored to receive my undergraduate and legal degrees. Education has been a foundation in my life and a source of enjoyment.

My jurisprudence is strong, deliberate and clear. My legal career commenced as a judicial extern for Federal Judge Phillip Pro. A great foundation was laid. From 2002 to 2004, I was a law clerk for the Civil Division of the Clark County District Attorney's Office. From there, I learned

the civil aspects of government. My passion, however, lied in the courtroom and advocacy. From 2004 to 2011, I served as Deputy Public Defender for Clark County. For seven years, I practiced under the vestiges of such powerful judges as Judge Togliatti, Judge Herndon, and Judge Cherry. I watched and listened, and learned to anchor my practice in fairness, efficiency, and knowledge. I performed nearly twenty category "A" jury trials. I was an extremely active trial attorney in the Office. I fought hard for my clients and obtained incredible results. I learned how to manage time, clients, and pressure. I have successfully argued before the Nevada Supreme Court several times. Legal writing and research is also paramount to me. My practice includes writing Nevada Supreme Court briefs and foundational motion work.

In 2011, I diversified my legal practice and started my own private practice. In 2011, I took over the battery domestic track from the Public Defender's Office. In doing so, I acquired hundreds of clients and continued to daily take on new clients. I embraced the opportunity with dedication and drive.

Single handedly, I operate every aspect of my practice, from the daily operations to all of the legal work. I am one hundred percent accountable. I have acquired significant business acumen and understanding of the business aspect of legal practice. The combination of public practice and private practice provides me with a complete and proficient understanding of the practice of law in Clark County, Nevada. I am counsel for a developer and manager of affordable senior housing in Clark County. I have direct experience and knowledge in matters involving land use, employment and fair housing.

The true testimony of my professionalism exists in the lives of the colleagues with whom I have worked, the clients whom I represented, and the judges in front of which I have practiced. My practice is to leave a place or person better than when I found it. I am an attorney who has

excellent client control, even with some of the most challenging of defendants, because I treat them with respect and dignity. That is my temperament and will be as District Court judge. I have dedicated my life to public service because I am committed to the democratic principles. I am highly experienced in these tenets of our legal system.

To be sure, I am a true believer in the democratic system. I am also, however, a true believer that people who commit offenses should be properly prosecuted. A heavy hand is necessary in some situations. Wisdom, life experience, and courtroom experience are tools a judge should possess. I possess these skills and am capable of exacting appropriate sentences.

As a Nevadan, I stand solidly on the ground and want to protect our community. I am responsible for myself, my family, and this community. I am committed to growth and success in all areas. My community contributions are significant. Throughout my career, I have always taken time to help guide, advise, and educate people who needed help. Many times, this is done on the courtroom steps, in between cases, and in the halls of the Regional Justice Center. I am also President of Silver State Housing, a non-profit organization whose mission is to help seniors. I am also a board member of Chosen for Success, which teaches individuals emotional intelligence and tools to succeed. Chosen for Success has a zero percent recidivism rate and currently operates out of Clark County Detention Center. If appointed, I would honor the time of others and Clark County's labor and resources. I am an individual who thinks for myself, but I also acknowledge and respect the framework and rules from which to operate. I will model my judicial conduct after the phenomenal professors and judges, from whom I watched, learned, and listened. The goal, states retired Justice Sandra Day O'Connor, of a judicial appointment is to select a person who is fair, impartial and willing to decide cases based on the evidence of law—free of special interest and fear of unpopularity. I submit that I am that person.

ATTACHMENT B
WRITING SAMPLE

1 NADINE MORTON, ESQ.
Nevada Bar Number 008583
2 MORTON LAW, PLLC
11700 West Charleston Blvd., Suite 170-65
3 Las Vegas, Nevada 89135
Telephone: (702) 718-3000
4 Email: Nadine@mortonlawnv.com
Attorney for Petitioner

5 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

6 JEFFREY PAUL MEEH,
7 Petitioner,
8 vs.
9 KIMBERLY WANKER, FIFTH
JUDICIAL DISTRICT COURT
10 JUDGE,
11 Respondent,
12 STATE OF NEVADA,
Real Party in Interest.

Case No.:

District Court Case No.: CR20-0037

**PETITION FOR WRIT OF
MANDAMUS**

13 COMES NOW Petitioner, JEFFREY PAUL MEEH, by and through his
14 attorney of record, NADINE MORTON, and files the instant Petition for Writ of
15 Mandamus requesting this Honorable Court vacate Judge Kimberly Wanker's
16 ruling entered on July 17, 2020, which imposed random drug testing on Meeh
17 without probable cause.

18 DATED this 13th day of January, 2022.

19 /s/ Nadine Morton
20 NADINE MORTON, ESQ.
Nevada Bar No. 85830-

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3 **CONSTITUTION**

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5 The Fourth Amendment to the United States Constitution.....8

6 Article I, Section 18 of the Nevada Constitution.....8

7 **ROUTING STATEMENT**

8 Petitioner JEFFREY PAUL MEEH (hereinafter referred to as “Meeh”)
9 agrees with the presumption, pursuant to NRAP 17(a), that his petition should first
10 be heard before the Nevada Supreme Court.

11

12 **RELIEF SOUGHT**

13 Meeh respectfully requests that this Honorable Court vacate Honorable Judge
14 Wanker’s Order directing Meeh to submit to random drug testing without probable
15 cause

16 **STATEMENT OF ISSUES**

17 Did the court unreasonably search Meeh when it ordered him to submit to
18 random drug testing during his arraignment when he was not charged with a drug
19 related offense, entered a not guilty plea, and did not appear under the influence?

20 **FACTS AND PROCEDURAL HISTORY**

1 **1. Charges/Indictments**

2 Meeh has been charged with possession of an instrument with burglarious
3 intent in violation of Nevada Revised Statute 205.080.

4 **2. Procedural History.**

5 Meeh appeared in Court on July 17, 2020, before Honorable Kimberly
6 Wanker (hereinafter “Wanker”) for his arraignment. (Petitioner Appendix “PA”
7 p.2). Wanker ordered Meeh submit to a urinalysis test as she does with all criminal
8 defendants in her court. (PA 2). The case was then called. (PA 2). On the record
9 Wanker stated that Meeh “tested positive” and ordered him to randomly test with
10 the Drug Court program. (PA 2). The matter was then reset. Meeh appeared for his
11 arraignment on September 4, 2020. (PA 2). At his arraignment he entered a not
12 guilty plea and the case was set for trial. (PA 2).

13 On April 12, 2021, the matter was set for a change of plea. (PA 4). The Court
14 canvassed Meeh, accepted his plea of guilt to an offense involving stolen property,
15 a misdemeanor, in violation of NRS 207.275(2)(a), and set the matter for
16 sentencing. (PA 4).

17 On August 20, 2021, Wanker again imposed a drug test on Meeh. (PA 6).
18 Meeh was unable to submit the sample and Wanker stated that Meeh
19 “acknowledges he would need to submit to drug testing” pursuant to the plea
20 agreement. (PA 6). Wanker also stated that he “was allowed to sign a guilty plea

1 agreement... that he voluntarily agreed to submit to drug testing.” (PA 6).
2 However, the random drug testing was imposed 9 months before the plea agreement
3 was entered. The court entered an order to show case to obtain another Judge’s
4 opinion on whether Meeh was in contempt of court and the matter was continued
5 to January 14, 2022. (PA 6).

6 **REASONS WHY WRIT SHOULD ISSUE**

7 **This is a proper case for issuance of a Writ of Mandamus.**

8 The Nevada Constitution and Nevada Revised Statutes provide the Supreme
9 Court original jurisdiction to issue writs of mandamus. Specifically, the
10 Constitution provides that the Court “shall have the power to issue writs of
11 mandamus and also, all writs necessary or proper to the complete exercise of its
12 appellate jurisdiction.” Nev. Const. Art. 6 § 4. Additionally, N.R.S. 34.160 provides
13 in pertinent part that a “writ may be issued by the Supreme Court to compel the
14 performance of an act which the law especially enjoins as a duty resulting from an
15 office, trust or station.” Together, these provisions have long been held to give
16 jurisdiction to the Supreme Court to entertain petitions for and issue writs of
17 mandamus, whether to compel an action or to correct an abuse of discretion. *See*
18 *State v. Dist. Ct.*, 116 Nev. 127 (2000) (citing *State ex rel Curtis v. McCollough*, 3
19 Nev. 202 (1867)).

20 Extraordinary relief is warranted for a couple of reasons. First, Meeh does

1 not have a plain, speedy, and adequate remedy in the ordinary course of law. *See*
2 NRS 34.170. Meeh and all other defendants before Wanker would be forced to
3 submit to random drug screening under threat of contempt of court and even before
4 arraignment. Second, Meeh's Fourth Amendment and Due Process rights were
5 violated without legitimate government interest. Meeh was ordered to sit for
6 random drug testing even though his charge was not drug related, he did not appear
7 incapacitated, and without probable cause. (PA 2-6).

8 ARGUMENT

9 1. *This Court has jurisdiction to issue a Writ of Mandamus*

10 This Court has original jurisdiction to issue writs of mandamus and
11 prohibition. Nev. Const. art. 6, § 4. Writs of mandamus and prohibition are
12 necessary if a petitioner does not have a "plain, speedy and adequate remedy in the
13 ordinary course of law." *Cote v. Eighth Judicial Dist. Ct.*, 124 Nev. 36, 39 175 P.3d
14 906, 908 (2008) (quoting NRS 34.170 and NRS 34.330). The writ of mandamus
15 compels the performance of an act the law requires, NRS 34.160, and the writ of
16 prohibition is available when a court acts in excess of its jurisdiction, NRS 34.320.

17 Writs of mandamus are available to correct the district court's arbitrary or
18 capricious exercise of discretion. *State v. Zogheib*, 130 Nev. 158,161, 321 P.3d
19 882, 884 (2014). A discretionary ruling that is "contrary to the evidence or
20 established rules of law" or is influenced by prejudice or preference rather than

1 *Ornelas v. United States*, 517 U.S. 690 (1996). "This court reviews the lawfulness
2 of a search de novo because such a review requires consideration of both factual
3 circumstances and legal issues." *Casteel v. State*, 122 Nev. 356,360, 131 P.3d 1, 3
4 (2006) (internal quotations omitted).

5 Probable cause for a search and seizure exists "where the known facts and
6 circumstances are sufficient to warrant a man of reasonable prudence in the belief
7 that contraband or evidence of a crime will be found." *Ornelas* at 696. To
8 determine whether reasonable suspicion exists, courts look to the totality of the
9 circumstances. *Alabama v. White*, 496 U.S. 325, 330-31 (1990); *State v. Rincon*,
10 122 Nev. 1170, 1173-74 (2006).

11 Here, Wanker gave absolutely no reason for ordering Meeh to submit to a
12 drug test before his case was called for arraignment. (PA 2). Meeh's arrest did not
13 nullify his fourth amendment right. The Court did not have probable cause to seize
14 his urine for a drug test before he entered his not guilty plea and the record is devoid
15 of any justifiable cause warranting this search.

16 **3. Wanker's Blanket Order Requiring Drug Testing Before**
17 **Arraignment and At Sentencing is Unconstitutional**

18 In *United States v. Scott*, 450 F.3d 863, 875 (9th Cir. 2005), the Ninth Circuit
19 Court of Appeals held that the government may not conduct a search of an
20 individual released while awaiting trial in Nevada, based on less than probable

1 cause even when his Fourth Amendment rights were waived as a condition of pre-
2 trial release. The Court held that the totality of the circumstances required probable
3 cause in order to search the defendant or his home. *Id.* at 863. Scott's assent to his
4 release conditions does not make an unreasonable search reasonable. *Id.* at 870. The
5 searches were not reasonable under a general "totality of the circumstances"
6 approach either. *Id.* at 871. The record reflects that the Wanker did not conduct a
7 totality of the circumstances test before Meeh's arraignment but instead imposed
8 her blanket "all defendants must test" order on him. However, under Scott it is clear
9 that Meeh had not waived his Fourth Amendment rights simply by being arrested
10 and at this point in the case, had not agreed to any conditions of pre-trial release.

11 Nevada's legislature has left release conditions to be determined in individual
12 cases. *See, e.g. NRS 178.484-4853.* Specifically, similar to the Fourth
13 Amendment's requirement that all searches be reasonable, NRS 178.484 (11)
14 requires that all conditions imposed must be reasonable. Where the statute speaks
15 to reasonable conditions to protect health, safety and welfare of the community to
16 ensure the accused will appear in court, there is nothing in the statute that speaks to
17 drug testing. Furthermore, the opposite could easily be true: that such a practice by
18 the district court reduces the likelihood a defendant will appear in court if he or she
19 is going to have to urinate for the court without a warrant and possibly be
20 incarcerated.

1 NRS 178.484(11) speaks to a court's ability to impose reasonable restrictions
2 "before" releasing a person arrested for any crime (emphasis added). Here, the
3 District Court looks to impose restrictions after a person has already been released
4 from custody, contrary to the wording in the statute. Unless a statute is ambiguous,
5 the plain meaning is to be attributed.

6 "The Nevada Legislature has not taken the position that drug use among
7 pretrial releasees impairs their tendency to show up in court." *State v. Cataino*, 120
8 Nev. 1030, 1033, 102 P.3d 588, 590 (2004). Additionally, in *Cruz v. Kauai*, the
9 Court stated "[o]ne ... released on pre-trial bail does not lose his or her Fourth
10 Amendment right to be free of unreasonable seizures." 279 F.3d 1064, 1068 (9th
11 Cir. 2002)

12 Finally, Nevada applies a reasonable suspicion standard to probationary
13 searches. *Allan v. State*, 746 P.2d 138 (Nev. 1987); NRS 171.123(2). Wanker's
14 ruling afforded Meeh less protection and privacy under the Fourth Amendment than
15 a person already convicted and sentenced to probation as Wanker did not articulate
16 any standard before imposing the drug testing on Meeh.

17 CONCLUSION

18 The Fourth Amendment is not rendered meaningless simply because Meeh
19 had a pending case before Judge Wanker. This Court should adhere to the precedent
20

1 of the *Scott* case and prohibit the District Court from effectuating its administrative
2 order any further.

3 DATED this 13th day of January, 2022.

4 /s/ Nadine Morton
5 NADINE MORTON, ESQ.
6 Nevada Bar No. 8583
7 **MORTON LAW, PLLC.**
8 Attorney for Petitioner Jeffrey Paul Meeh
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DATED this 13th day of January, 2022.

/s/ Nadine Morton
NADINE MORTON, ESQ.
Nevada Bar No. 8583
MORTON LAW, PLLC.
Attorney for Petitioner Jeffrey Paul Meeh

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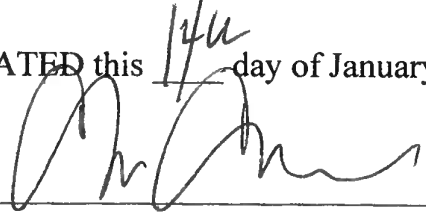
VERIFICATION

STATE OF NEVADA)
)ss:
COUNTY OF NYE)

I, Nadine Morton, being first duly sworn, deposes and states as follows:

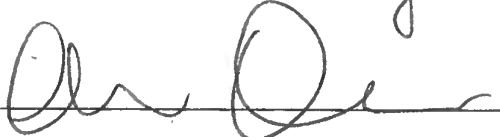
That I represent the Petitioner in the above-entitled action; that I have read the foregoing Petition for Writ of Mandamus and know the contents thereof, that the same is true of my own knowledge, except for those matters therein contained stated on information and belief, and as to those matters, I believe them to be true. I further verify Petitioner has personally authorized me to commence this action.

DATED this 14 day of January, 2022.

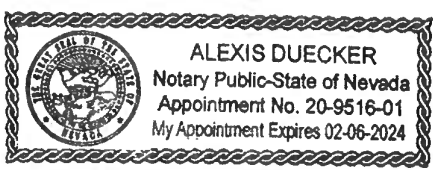


Nadine Morton, Esq. for Jeffrey Paul Meeh

SUBSCRIBED and SWORN to before me
this 14 day of January, 2022.



NOTARY PUBLIC in and for said
Nye
~~Clark~~ County, State of Nevada



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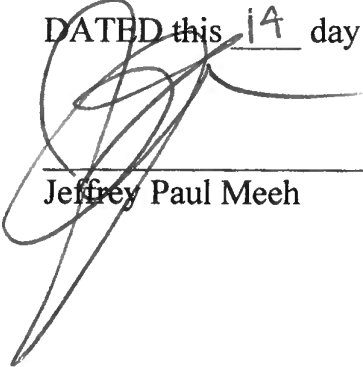
VERIFICATION

STATE OF NEVADA)
)ss:
COUNTY OF NYE)

I, Jeffrey Paul Meeh, being first duly sworn, deposes and states as follows:

That I am the Petitioner in the above-entitled action; that I have read the foregoing Petition for Writ of Mandamus and know the contents thereof, that the same is true of my own knowledge, except for those matters therein contained stated on information and belief, and as to those matters, I believe them to be true.

DATED this 14 day of January, 2022.

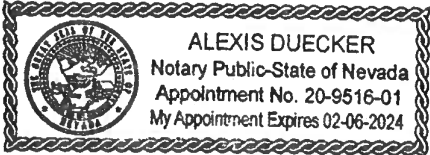


Jeffrey Paul Meeh

SUBSCRIBED and SWORN to before me
this 14 day of January, 2022.



NOTARY PUBLIC in and for said
Nye
~~Clark~~ County, State of Nevada




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CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 14th day of January, 2022, a copy of the foregoing Petition for Writ of Mandamus was deposited in the United States Post Office at Las Vegas, Nevada, postage prepaid, addressed to the following:

Chris Arabia
Nye County District Attorney
P.O Box 39
Pahrump, Nevada 89041

The Honorable Kimberly Wanker
Fifth Judicial District Court Judge
Department 1
P.O. Box 153
101 Radar Road
Tonopah, Nevada 89049

/s/ 
Nadine Morton, Esq.