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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

LINKSMART WIRELESS  
TECHNOLOGY, LLC

Plaintiff(s),

vs.

MGM RESORTS INTERNATIONAL

Defendant(s).

Case # 2:18-cv-00867-MMD-NJK

**VERIFIED PETITION FOR  
PERMISSION TO PRACTICE  
IN THIS CASE ONLY BY  
ATTORNEY NOT ADMITTED  
TO THE BAR OF THIS COURT  
AND DESIGNATION OF  
LOCAL COUNSEL**

FILING FEE IS \$250.00

Minna Y. Chan, Petitioner, respectfully represents to the Court:  
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of

Russ August & Kabat  
(firm name)

with offices at 12424 Wilshire Boulevard, 12th Floor,  
(street address)

Los Angeles, California, 90025  
(city) (state) (zip code)

310-826-7474, mchan@raklaw.com  
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by

Linksmart Wireless Technology, LLC to provide legal representation in connection with  
[client(s)]

the above-entitled case now pending before this Court.

Rev. 5/16

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3. That since 12/03/2015, Petitioner has been and presently is a  
(date)  
member in good standing of the bar of the highest Court of the State of California  
(state)  
where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or  
from the clerk of the supreme court or highest admitting court of each state, territory, or insular  
possession of the United States in which the applicant has been admitted to practice law certifying  
the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District  
Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts  
of other States on the dates indicated for each, and that Petitioner is presently a member in good  
standing of the bars of said Courts.

Court	Date Admitted	Bar Number
USDC Central District of California	12/11/2015	305941
USDC Northern District of California	08/06/2017	305941
US Court of Appeal for the Federal Circuit	11/30/2017	305941

5. That there are or have been no disciplinary proceedings instituted against petitioner,  
nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory  
or administrative body, or any resignation or termination in order to avoid disciplinary or  
disbarment proceedings, except as described in detail below:

(State "none" if Petitioner has no disciplinary proceedings, etc.) none

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6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give particulars if ever denied admission):

(State "none" if Petitioner has never been denied admission.) none

7. That Petitioner is a member of good standing in the following Bar Associations.

(State "none" if Petitioner is not a member of other Bar Associations.) California

8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
None			

(If necessary, please attach a statement of additional applications)

9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.

10. Petitioner agrees to comply with the standards of professional conduct required of the members of the bar of this court.

11. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.


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That Petitioner respectfully prays that Petitioner be admitted to practice before this Court  
FOR THE PURPOSES OF THIS CASE ONLY.

  
\_\_\_\_\_  
Petitioner's signature

STATE OF California )  
COUNTY OF Los Angeles )

Minna Y. Chan, Petitioner, being first duly sworn, deposes and says:  
That the foregoing statements are true.

  
\_\_\_\_\_  
Petitioner's signature

Subscribed and sworn to before me this \_\_\_\_\_  
\_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

*See attached  
TCA*

\_\_\_\_\_  
Notary Public or Clerk of Court

**DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO  
THE BAR OF THIS COURT AND CONSENT THERETO.**

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner  
believes it to be in the best interests of the client(s) to designate Mark Borghese,  
(name of local counsel)  
Attorney at Law, member of the State of Nevada and previously admitted to practice before the  
above-entitled Court as associate resident counsel in this action. The address and email address of  
said designated Nevada counsel is:

10161 Park Run Drive, Suite 150,  
(street address)  
Las Vegas, Nevada, 89145,  
(city) (state) (zip code)  
702-382-0200, mark@borgheselegal.com.  
(area code + telephone number) (Email address)

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes  
2 agreement and authorization for the designated resident admitted counsel to sign stipulations  
3 binding on all of us.  
4

5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6  
7 The undersigned party(ies) appoint(s) Mark Borghese as  
8 his/her/their Designated Resident Nevada Counsel in this case.  
9

10   
11 (party's signature)

12 Koichiro Ikudome, CEO  
13 (type or print party name, title)

14 \_\_\_\_\_  
15 (party's signature)

16 \_\_\_\_\_  
17 (type or print party name, title)

18 **CONSENT OF DESIGNEE**

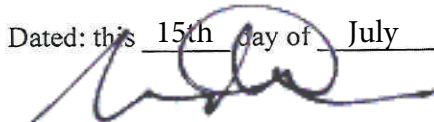
19 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.  
20

21   
22 Designated Resident Nevada Counsel's signature

23 6231 mark@borgheselegal.com  
24 Bar number Email address

25 APPROVED:

26 Dated: this 15th day of July, 2019.

27   
28 \_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

CALIFORNIA JURAT WITH AFFIANT STATEMENT

CIVIL CODE § 8202

- See Attached Document (Notary to cross out lines 1-6 below)
- See Statement Below (Lines 1-6 to be completed only by document signer[s], *not* Notary)

1. \_\_\_\_\_

2. \_\_\_\_\_

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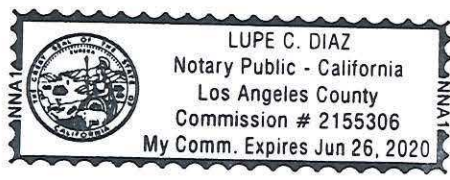
Signature of Document Signer No. 1 \_\_\_\_\_ Signature of Document Signer No. 2 (if any) \_\_\_\_\_

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California )  
 County of Los Angeles )

Subscribed to (or affirmed) before me on  
 this 11th day of July, 2019  
Date Month Year  
 by  
 (1) Minna Y. Chan  
 (and (2) \_\_\_\_\_),  
Name(s) of Signer(s)

Proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



Signature [Signature]  
Signature of Notary Public

*Seal*  
 Place Notary Seal Above

**OPTIONAL**

*Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.*

**Description of Attached Document**

Title or Type of Document: Verified Petition for Permission to Practice in This Case Only by Attorney not Admitted to the Bar of this Court and Designation of Local Counsel (U.S. District Court, District of Nevada)  
 Document Date: 7/11/2019 Number of Pages: 5 Signer(s) Other Than Named Above: None



# Supreme Court of California

JORGE E. NAVARRETE  
*Clerk and Executive Officer of the Supreme Court*

**CERTIFICATE OF THE CLERK OF THE SUPREME COURT**  
**OF THE**  
**STATE OF CALIFORNIA**

**MINNA Y. CHAN**

*I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that MINNA Y. CHAN, #305941, was on the 3rd day of December 2015, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court  
on the 27th day of June 2019.*

JORGE E. NAVARRETE  
*Clerk/Executive Officer of the Supreme Court*

By:   
C. Wong, Senior Deputy Clerk