

1 LUKE A. BUSBY, ESQ  
 Nevada Bar No. 10319  
 2 LUKE ANDREW BUSBY, LTD.  
 316 California Ave # 82  
 3 Reno, Nevada 89509  
 O: 775.453.0112  
 4 [luke@lukeandrewbusbyltd.com](mailto:luke@lukeandrewbusbyltd.com)  
*Designated Resident Nevada Counsel for Plaintiff*

5 Sarah Grady*	David B. Owens*
6 Loevy & Loevy	Loevy & Loevy
7 311 N. Aberdeen St., 3rd Fl.	100 S. King St., St. 100
Chicago, IL 60607	Seattle, WA 98104
8 O: 312.243.5900	O: 312-243-5900
sarah@loevy.com	david@loevy.com
9 *Verified petitions for permission to practice forthcoming	
10 <i>Counsel for Plaintiff Craig Farah, Personal Representative</i>	
11 <i>of the Estate of Nicholas Farah</i>	

11 **IN THE UNITED STATES DISTRICT COURT**  
 12 **FOR THE DISTRICT OF NEVADA**

13 CRAIG FARAH, Personal  
 Representative of the ESTATE OF  
 14 NICHOLAS FARAH,

15 Plaintiff,

16 vs.

No. 2:20-cv-00604

17 LAS VEGAS METROPOLITAN  
 18 POLICE DEPARTMENT; RICHARD  
 NEWMAN; SAMUEL MENDOZA;  
 19 AARON MOSELY; JEREMY  
 STEWART; CHRISTY SNAPP;  
 20 GABRIEL VILLANUEVA; KIM SOFFE;  
 and COLLIN PETRIELIUS,

21 Defendants.  
 22

**PLAINTIFF’S UNOPPOSED  
 MOTION FOR LEAVE TO FILE  
 INSTANTER VERIFIED PETITION  
 FOR DAVID OWENS AND MOTION  
 FOR EXTENSION OF TIME TO  
 FILE VERIFIED PETITION FOR  
 SARAH GRADY**

24  
 25 Now comes Plaintiff, Craig Farah, as Personal Representative of the Estate  
 26 of Nicholas Farah, by and through his undersigned counsel, and respectfully  
 27 requests that this Court permit Plaintiff’s attorney, David Owens, leave to file his  
 28 verified petition for permission to practice in this case *instanter*. Plaintiff further

1 requests an extension of time to June 11 to file Sarah Grady's verified petition for  
2 permission to practice in this case. In support of his requests, Plaintiff states as  
3 follows:

4 1. Plaintiff has filed a 42 U.S.C. § 1983 lawsuit against the Las Vegas  
5 Metropolitan Police Department and others over the death of his son, Nicholas  
6 Farah, at the Clark County Detention Center (CCDC) on March 31, 2019. Dkt. 1.

7 2. Plaintiff is represented in this lawsuit by David Owens and Sarah  
8 Grady at Loevy & Loevy, a civil rights law firm headquartered in Chicago. They are  
9 not licensed to practice law in the State of Nevada, but are working with the  
10 undersigned as Designated Resident Nevada Counsel for Plaintiff.

11 3. This Court previously ordered counsel to file verified petitions by May  
12 16, 2020. Dkt. 3. Unfortunately, because of difficulties due to the COVID-19  
13 pandemic, and uncertainty regarding counsel's ability to obtain the required  
14 notarization of the verified petitions while under stay-at-home orders, counsel was  
15 unable to file their petitions by the May 16 deadline.

16 4. Counsel has since resolved these issues, and been able to begin  
17 completing the verified petitions. Accordingly, Plaintiff has attached to this motion  
18 the required verified petition for permission to practice in this case for David  
19 Owens. Ex. A.

20 5. Unfortunately, Sarah Grady's verified petition is not yet complete, as  
21 she is still waiting to receive a certificate of good standing from the State of New  
22 York, one of the two states where she is licensed to practice law. Accordingly,  
23 Plaintiff respectfully requests a brief extension of time, up to and including June 11,  
24 to provide Ms. Grady's verified petition.

25 6. Counsel for Plaintiff has conferred with counsel for the Defendants  
26 (excepting Defendant Collin Petrielius who has not yet been served). Counsel for  
27 Defendants report that they do not oppose Plaintiff's request.  
28

1 WHEREFORE, Plaintiff respectfully requests that this Court permit  
2 Plaintiff's attorney, David Owens, leave to file his verified petition for permission to  
3 practice in this case *instanter*, and to permit Plaintiff's attorney, Sarah Grady, a  
4 brief extension of time to June 11 to file her verified petition for permission to  
5 practice.

6 Dated: May 28, 2020

7 Respectfully submitted,

8 CRAIG FARAH

9 By: /s/ Luke A Busby  
10 Designated Resident Nevada Counsel  
for Plaintiff

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*Designated Resident Nevada Counsel for Plaintiff*

16 Sarah Grady\*  
17 Loevy & Loevy  
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Chicago, IL 60607  
O: 312.243.5900  
[sarah@loevy.com](mailto:sarah@loevy.com)

David B. Owens\*  
Loevy & Loevy  
100 S. King St., St. 100  
Seattle, WA 98104  
O: 312-243-5900  
[david@loevy.com](mailto:david@loevy.com)

19 \*Verified petitions for permission to practice forthcoming  
20 *Counsel for Plaintiff Craig Farah, Personal Representative  
of the Estate of Nicholas Farah*

21  
22 **CERTIFICATE OF SERVICE**

23 I, Luke A. Busby, an attorney, hereby certify that on May 27, 2020, I filed  
24 the foregoing via CM/ECF, which effected service on all counsel of record. I further  
25 certify that I will ensure that Defendant Collin Petrielijs receives a copy of the  
26 foregoing at the time that he is served with notice of this lawsuit pursuant to Rule 4  
of the Federal Rules of Civil Procedure.

27 /s/ Luke A Busby  
28 Designated Resident Nevada Counsel  
for Plaintiff

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 Designated Resident Nevada Counsel for Plaintiff

5 Sarah Grady*	David B. Owens*
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10 of the Estate of Nicholas Farah	

11 **IN THE UNITED STATES DISTRICT COURT**  
 12 **FOR THE DISTRICT OF NEVADA**

13 CRAIG FARAH, Personal  
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16 vs.

No. 2:20-cv-00604

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 19 AARON MOSELY; JEREMY  
 STEWART; CHRISTY SNAPP;  
 20 GABRIEL VILLANUEVA; KIM SOFFE;  
 and COLLIN PETRIELIUS,  
 21 Defendants.  
 22

**PLAINTIFF’S LIST OF EXHIBITS  
 FOR UNOPPOSED MOTION FOR  
 LEAVE TO FILE *INSTANTER*  
 VERIFIED PETITION FOR DAVID  
 OWENS AND MOTION FOR  
 EXTENSION OF TIME TO  
 FILE VERIFIED PETITION FOR  
 SARAH GRADY**

No.	Description
A	David Owens Verified Petition

1 Dated: May 28, 2020

2 Respectfully submitted,

3 CRAIG FARAH

4 By: /s/ Luke A Busby  
5 Designated Resident Nevada Counsel  
6 for Plaintiff

7 LUKE A. BUSBY, ESQ  
8 Nevada Bar No. 10319  
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11 David B. Owens\*  
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16 [david@loevy.com](mailto:david@loevy.com)

17 \*Verified petitions for permission to practice forthcoming  
18 *Counsel for Plaintiff Craig Farah, Personal Representative*  
19 *of the Estate of Nicholas Farah*

20 **CERTIFICATE OF SERVICE**

21 I, Luke A. Busby, an attorney, hereby certify that on May 27, 2020, I filed  
22 the foregoing via CM/ECF, which effected service on all counsel of record. I further  
23 certify that I will ensure that Defendant Collin Petrielius receives a copy of the  
24 foregoing at the time that he is served with notice of this lawsuit pursuant to Rule 4  
25 of the Federal Rules of Civil Procedure.

26 /s/ Luke A Busby  
27 Designated Resident Nevada Counsel  
28 for Plaintiff

# **Exhibit A**

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Verified Petition of David Owens

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Craig Farah, Personal Representative of the  
Estate of Nicholas Farah  
  
Plaintiff(s),  
  
vs.  
  
LVPMD, et al.,  
  
Defendant(s).

Case #20-cvcv-604

**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

David Owens, 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  
Loevy & Loevy

(firm name)

with offices at 100 S. King Street #100-748  
(street address)

Seattle, Washington, 98104  
(city) (state) (zip code)

312-243-5900, david@loevy.com  
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by  
Plaintiff, Craig Farah to provide legal representation in connection with  
[client(s)]

the above-entitled case now pending before this Court.

3. That since 5/9/2013, Petitioner has been and presently is a member in good standing of the bar of the highest Court of the State of Illinois 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
State of California	1/13/2011	275030
State of Washington	9/5/2018	53856
7th Circuit Court of Appeals	5/11/2011	none
US District Court for the ND Illinois	5/9/2013	none
US District Court for the ND Indiana	1/11/2013	none
US District Court for the CD Illinois	7/18/2014	none
US District Court for the ND Ohio	1/25/2015	none
US District Court for the WD Wisconsin	8/7/2015	none
US District Court of ED Wisconsin	6/23/2017	none
US District Court for the SD Texas	11/23/2015	none
Central District of California	1/14/2016	none
Western District of Washington	9/5/2018	none
5th Circuit Court of Appeals	10/30/2018	none
9th Circuit Court of Appeals	9/26/2018	none

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:

none



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

3 none  
4  
5

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

7 none  
8  
9

10          8.       Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2  
11 (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
8/26/2016	Woods v. Reno	US District Court of NV	Granted
8/28/2019	Lobato v. LVMPD	US District Court of NV	Granted

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

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

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

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

27

28

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

*[Handwritten Signature]*  
\_\_\_\_\_  
Petitioner's signature

3  
4 STATE OF washington }  
5 COUNTY OF king }

6  
7 David B. Owens, Petitioner, being first duly sworn, deposes and says:

8 That the foregoing statements are true.

*[Handwritten Signature]*  
\_\_\_\_\_  
Petitioner's signature

9  
10 Subscribed and sworn to before me this

11 26<sup>th</sup> day of May, 2020.

12  
13 *[Handwritten Signature]*  
\_\_\_\_\_  
14 Notary Public or Clerk of Court  
Tiamah D. ERICKSON, notary public



15  
16 **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO**  
17 **THE BAR OF THIS COURT AND CONSENT THERETO.**

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

24 316 California Ave #82  
(street address)

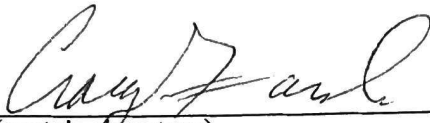
25 Reno, Nevada, 89509  
(city) (state) (zip code)

26 775-453-0112, luke@lukeandrewbusbyltd.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) Luke A. Busby as  
8 his/her/their Designated Resident Nevada Counsel in this case.  
(name of local counsel)

9  
10  5-27-2020  
11 (party's signature)

12 Craig Farah, Plaintiff  
(type or print party name, title)

13  
14 (party's signature)

15  
16 (type or print party name, title)

17 **CONSENT OF DESIGNEE**


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

19  
20   
Designated Resident Nevada Counsel's signature

21 10319 luke@lukeandrewbusbyltd.com  
22 Bar number Email address

23 APPROVED:

24 DATED this 18th day of June, 2020.

25  
26   
27 RICHARD F. BOULWARE, II  
28 United States District Judge


## Certificate of Admission To the Bar of Illinois

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

David Benjamin Owens

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 05/09/2013 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto  
subscribed my name and affixed the  
seal of said Court, this 8th day of  
April, 2020.



Clerk,  
Supreme Court of the State of Illinois



# 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

**DAVID BENJAMIN OWENS**


*I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that DAVID BENJAMIN OWENS, #275030, was on the 3rd day of January 2011, 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 21st day of February 2020.*

JORGE E. NAVARRETE

*Clerk/Executive Officer of the Supreme Court*

By: \_\_\_\_\_

  
*C. Wong, Senior Deputy Clerk*

**IN THE SUPREME COURT OF THE STATE OF WASHINGTON**

IN THE MATTER OF THE ADMISSION	)	BAR NO. 53856
	)	
OF	)	<b>CERTIFICATE</b>
	)	
DAVID B. OWENS	)	<b>OF</b>
	)	
TO PRACTICE IN THE COURTS OF THIS STATE	)	<b>GOOD STANDING</b>
	)	

---

I, Susan L. Carlson, Clerk of the Supreme Court of the State of Washington, hereby certify

**DAVID B. OWENS**

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on August 10, 2018, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said Court this 31<sup>st</sup> day of January, 2020.

A handwritten signature in blue ink, which appears to read "Susan L. Carlson". The signature is written in a cursive style and is positioned above a horizontal line.

Susan L. Carlson  
Supreme Court Clerk  
Washington State Supreme Court