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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Case # 3:14-cv-00175-LRH-WGC

Andrey Slomnitsky

Plaintiff(s),

vs.

Scott A. Caldwell, Robert M. Buchan,  
Randy E. Buffington, Stephen M. Jones

Defendant(s).

**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

Kian Tamaddoni, 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  
Sullivan & Cromwell LLP

(firm name)

with offices at 1870 Embarcadero Road,  
(street address)

Palo Alto, California, 94303,  
(city) (state) (zip code)

(650)461-5600, tamaddonik@sullcrom.com,  
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by  
Scott A. Caldwell, Robert M. Buchan \* to provide legal representation in connection with  
[client(s)]

the above-entitled case now pending before this Court.

\*Randy E. Buffington, and Stephen M. Jones

1 3. That since December 9, 2016, Petitioner has been and presently is a  
 2 (date) member in good standing of the bar of the highest Court of the State of California  
 3 (state) where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or  
 4 from the clerk of the supreme court or highest admitting court of each state, territory, or insular  
 5 possession of the United States in which the applicant has been admitted to practice law certifying  
 6 the applicant's membership therein is in good standing.

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

11 Court	Date Admitted	Bar Number
12 <u>United States Court of Appeals, Ninth Circuit</u>	<u>May 10, 2019</u>	<u>312624</u>
13 <u>United States District Court, Northern District CA</u>	<u>April 19, 2019</u>	<u>312624</u>
14 <u>United States District Court, Eastern District CA</u>	<u>April 26, 2019</u>	<u>312624</u>
15 <u>United States District Court, Southern District CA</u>	<u>April 9, 2019</u>	<u>312624</u>
16 <u>United States District Court, Central District CA</u>	<u>April 22, 2019</u>	<u>312624</u>
17		
18		

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

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

N/A

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

California Bar Association  
American Bar Association

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			

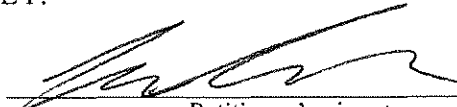
(If necessary, please attach a statement of additional applications)

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.


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

3  
4   
5 \_\_\_\_\_  
6 Petitioner's signature

7 STATE OF California )  
8 COUNTY OF Santa Clara )

9 Kian Tamaddoni, Petitioner, being first duly sworn, deposes and says:

10 That the foregoing statements are true.

11   
12 \_\_\_\_\_  
13 Petitioner's signature

14 Subscribed and sworn to before me this

15 25<sup>th</sup> day of September, 2019.

16 Maria Isabel Cabrera Ramirez (see attached seal)  
17 \_\_\_\_\_  
18 Notary Public or Clerk of Court

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


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

27 Dickinson Wright PLLC, 100 W Liberty Street, Suite 940,  
28 \_\_\_\_\_  
(street address)  
Reno, Nevada, 89501,  
29 \_\_\_\_\_  
(city) (state) (zip code)  
(775)343-7500, jdesmond@dickinsonwright.com.  
30 \_\_\_\_\_  
(area code + telephone number) (Email address)

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

5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**  
6

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

10 By:   
11 (party's signature)

12 SCOTT A. CALDWELL, Defendant  
13 (type or print party name, title)

14 (party's signature)

15 ROBERT M. BUCHAN, Defendant  
16 (type or print party name, title)

17 (party's signature)

18 RANDY E. BUFFINGTON, Defendant  
19 (type or print party name, title)

20 (party's signature)

21 STEPHEN M. JONES, Defendant  
22 (type or print party name, title)  
23  
24

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4

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6

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9

10 By: \_\_\_\_\_  
11 (party's signature)

12 SCOTT A. CALDWELL, Defendant  
13 (type or print party name, title)

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

16 ROBERT M. BUCHAN, Defendant  
17 (type or print party name, title)

18 \_\_\_\_\_  
19 (party's signature)

20 RANDY E. BUFFINGTON, Defendant  
21 (type or print party name, title)

22 \_\_\_\_\_  
23 (party's signature)

24 STEPHEN M. JONES, Defendant  
(type or print party name, title)

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11 (party's signature)

12 SCOTT A. CALDWELL, Defendant

(type or print party name, title)

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

15 ROBERT M. BUCHAN, Defendant

(type or print party name, title)

16 \_\_\_\_\_  
17 (party's signature)

18 RANDY E. BUFFINGTON, Defendant

(type or print party name, title)

19 \_\_\_\_\_  
20 (party's signature)

21 STEPHEN M. JONES, Defendant

(type or print party name, title)

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**CONSENT OF DESIGNEE**

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



Designated Resident Nevada Counsel's signature

5618

Bar number

[jdesmond@dickinsonwright.com](mailto:jdesmond@dickinsonwright.com)

Email address

APPROVED:

DATED this 26th day of September, 2019.



LARRY R. HICKS

UNITED STATES DISTRICT JUDGE





The State Bar  
*of California*

OFFICE OF ATTORNEY REGULATION  
& CONSUMER RESOURCES

180 Howard Street, San Francisco, CA 94105

888-800-3400

AttorneyRegulation@calbar.ca.gov

## CERTIFICATE OF STANDING

September 18, 2019

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, KIAN TAMADDONI, #312624 was admitted to the practice of law in this state by the Supreme Court of California on December 9, 2016 and has been since that date, and is at date hereof, an ACTIVE licensee of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "D/V", positioned above the name Denise Velasco.

Denise Velasco  
Custodian of Records

**CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT**

**CIVIL CODE § 1189**

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 Santa Clara )  
On September 25, 2019 before me, Maria Isabel Caldera Ramirez  
Date Here Insert Name and Title of the Officer  
personally appeared Kian Tamaddoni  
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature \_\_\_\_\_  
Signature of Notary Public

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: Pro Hac Vice Nevada Petition Document Date: 9/25/19  
Number of Pages: 6 Signer(s) Other Than Named Above: \_\_\_\_\_

**Capacity(ies) Claimed by Signer(s)**

Signer's Name: Kian Tamaddoni  
 Corporate Officer — Title(s): \_\_\_\_\_  
 Partner —  Limited  General  
 Individual  Attorney in Fact  
 Trustee  Guardian or Conservator  
 Other: \_\_\_\_\_  
Signer Is Representing: \_\_\_\_\_

Signer's Name: \_\_\_\_\_  
 Corporate Officer — Title(s): \_\_\_\_\_  
 Partner —  Limited  General  
 Individual  Attorney in Fact  
 Trustee  Guardian or Conservator  
 Other: \_\_\_\_\_  
Signer Is Representing: \_\_\_\_\_