

1 **HAL TAYLOR, ESQ.**
2 **Nevada State Bar #4399**
3 **2551 West Lakeridge Shores**
4 **Reno, NV 89519**
5 **TEL: (775) 825-2223**
6 **FAX: (775) 329-1113**
7 **(HalTaylorLawyer@GBIS.com)**
8 **Attorney for Respondent**

FILED

FEB 15 2024

REAL ESTATE COMMISSION

BY Kelly Valadez

10 **BEFORE THE REAL ESTATE COMMISSION**
11 **STATE OF NEVADA**

13 SHARATH CHANDRA, Administrator,)
14 REAL ESTATE DIVISION, DEPT. OF)
15 BUSINESS & INDUSTRY, STATE OF)
16 NEVADA)
17 MARSHALL CARRASCO,)
18)
19 Petitioner,)
20 vs.)
21)
22 MARSHALL CARRASCO)
23 (B.1000579.INDIV))
24)
25 Respondent.)

Case No.: 2021-1122
2022-120

27 **MOTION TO ASSOCIATE COUNSEL**

29 Respondent, Marshall Carrasco (“Respondent”), hereby moves the Nevada
30 Real Estate Commission for an Order permitting Robert F. Merlo, Esq. of Wilson
31 Elser LLP to practice in Nevada pursuant to Nevada Supreme Court Rule 42. This
32 motion is supported by the attached “Verified Application for Association of
33 Counsel” (**Exhibit A**), “Certificate of Standing” from Illinois (**Exhibit B**) and the
34 State Bar of Nevada Statement (**Exhibit C**).

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Signed: _____

Hal Taylor, Esq., Attorney For Respondent
2551 West Lakeridge Shores
Reno, NV 89519
(775) 825-2223
Halaylorlawyer@gbis.com

100 -

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4 **Reno, NV 89519**
5 **TEL: (775) 825-2223**
6 **FAX: (775) 329-1113**
7 **(HalTaylorLawyer@GBIS.com)**
8 **Attorney for Respondent**

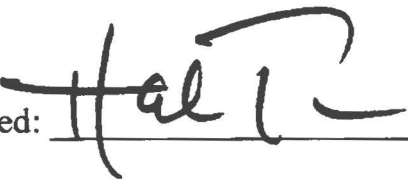
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10 **BEFORE THE REAL ESTATE COMMISSION**
11 **STATE OF NEVADA**

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13 SHARATH CHANDRA, Administrator,)
14 REAL ESTATE DIVISION, DEPT. OF)
15 BUSINESS & INDUSTRY, STATE OF)
16 NEVADA)
17 MARSHALL CARRASCO,)
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Case No.: 2021-1122
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Signed:  _____

Hal Taylor, Esq., Attorney For Respondent
2551 West Lakeridge Shores
Reno, NV 89519
(775) 825-2223
Halaylorlawyer@gbis.com

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Exhibit A

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Exhibit A

RECEIVED BY

FEB 07 2024

STATE BAR OF NEVADA

155673 750-AM

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA, IN AND FOR THE COUNTY OF WASHOE

4399
✓IL
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MARSHALL CARRASCO,)

Petitioner,)

vs.)

SHARATH CHANDRA, Administrator,)
REAL ESTATE DIVISION, DEPT. OF)
BUSINESS & INDUSTRY, STATE OF)
NEVADA.)

Respondent.)

Case No.: CV23-01732

Dept. No.: 6

BEFORE THE REAL ESTATE COMMISSION
STATE OF NEVADA

SHARATH CHANDRA, Administrator,)
REAL ESTATE DIVISION, DEPT. OF)
BUSINESS & INDUSTRY, STATE OF)
NEVADA MARSHALL CARRASCO,)

Petitioner,)

vs.)

MARSHALL CARRASCO)
(B.1000579.INDIV),)

Respondent.)

Case No.: 2021-1122

2022-120

VERIFIED APPLICATION FOR ASSOCIATION
OF COUNSEL UNDER NEVADA SUPREME COURT RULE 42

Robert F. Merlo

_____, Petitioner, respectfully represents:
First Middle Name Last

1. Petitioner resides at 3540 N. Wolcott Ave, Unit 2, Chicago, IL 60657, (847) 323-5584

2. Petitioner is an attorney at law and a member of the law firm of: Wilson Elser Moskowitz

**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF
NEVADA, IN AND FOR THE COUNTY OF WASHOE**

MARSHALL CARRASCO,)	
)	
Petitioner,)	Case No.: CV23-01732
vs.)	Dept. No.: 6
)	
SHARATH CHANDRA, Administrator,)	
REAL ESTATE DIVISION, DEPT. OF)	
BUSINESS & INDUSTRY, STATE OF)	
NEVADA.)	
)	
Respondent.)	

**BEFORE THE REAL ESTATE COMMISSION
STATE OF NEVADA**

SHARATH CHANDRA, Administrator,)	
REAL ESTATE DIVISION, DEPT. OF)	
BUSINESS & INDUSTRY, STATE OF)	
NEVADA)	
MARSHALL CARRASCO,)	
)	
Petitioner,)	Case No.: 2021-1122
vs.)	2022-120
)	
MARSHALL CARRASCO)	
(B.1000579.INDIV),)	
)	
Respondent.)	

**VERIFIED APPLICATION FOR ASSOCIATION
OF COUNSEL UNDER NEVADA SUPREME COURT RULE 42**

Robert F. Merlo

_____, Petitioner, respectfully represents:
 First Middle Name Last

1. Petitioner resides at 3540 N. Wolcott Ave, Unit 2, Chicago, IL 60657, (847) 323-5584
2. Petitioner is an attorney at law and a member of the law firm of: Wilson Elser Moskowitz

Edelman & Dicker LLP

with offices at 55 W. Monroe Street, Suite 3800, Chicago, IL 60603, (312) 821-

6170 , Robert.merlo@wilsonelser.com

3. Petitioner has been retained personally or as a member of the above named law firm by Marshall Carrasco to provide legal representation in connection with the above-entitled matter now pending before the above referenced court.

4. Since November 9 of 2017, petitioner has been, and presently is, a member of good standing of the bar of the highest court of the State of Illinois where petitioner regularly practices law.

5. 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/or courts of other states on the dates indicated for each, and is presently a member in good standing of the bars of said Courts:

DATE ADMITTED

United States District Court, Northern District of Illinois – April 21, 2022

6. Is Petitioner currently suspended or disbarred in any court? You must answer yes or no. If yes, give particulars; e.g., court, jurisdiction, date: No.

7. Is Petitioner currently subject to any disciplinary proceedings by any organization with authority at law? You must answer yes or no. If yes, give particulars, e.g. court, discipline authority, date,

status: No.

8. Has Petitioner ever received public discipline including, but not limited to, suspension or disbarment, by any organization with authority to discipline attorneys at law? You must answer yes or no. If yes, give particulars, e.g. court, discipline authority, date, status: No.

9. Has Petitioner ever had any certificate or privilege to appear and practice before any regulatory administrative body suspended or revoked? You must answer yes or no. If yes, give particulars, e.g. date, administrative body, date of suspension or reinstatement: No.

10. Has Petitioner, either by resignation, withdrawal, or otherwise, ever terminated or attempted to terminate Petitioner's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings? You must answer yes or no. If yes, give particulars: No.

11. Petitioner, or any member of petitioner's firm, has/have filed the following application(s) to appear as counsel under Nevada Supreme Court Rule 42 during the past three (3) years in the following matter(s), if none, indicate so: *(do not include Federal Pro Hac)*

<u>Date of Application</u>	<u>Cause</u>	<u>Title of Court Administrative Body or Arbitrator</u>	<u>Was Application Granted or Denied?</u>
----------------------------	--------------	---------------------------------------------------------	-------------------------------------------

Andrew T. Stoker	A-18-770467-C	Mary Riggs	Brenda Halverson	District Court	6/12/2023	7/7/2023	Wilson Elser Mostowitz Edelman & Dickler, LLP
Cory J. Wright	A-18-770467-C	Mary Riggs	Brenda Halverson	District Court	7/6/2022	8/22/2022	Wilson Elser Mostowitz Edelman & Dickler, LLP
Lori Diane Proctor	A-17-788685-C	Nancy Lasky	Thi of Nevada II at Desert Lane, LLC	DISTRICT COUF	3/4/2022	5/4/2022	Wilson Elser Mostowitz Edelman & Dickler, LLP
Lori Diane Proctor	CV20-00188	Iana McCain	HCP Properties - Wingfield Hills NV		5/10/2023		Wilson Elser Mostowitz Edelman & Dickler, LLP
Kathryn Anne Grace	A-18-770467-C	Mary Riggs	Brenda Halverson	District Court	11/5/2021	12/18/2021	Wilson, Elser, Mostowitz, Edelman & Dickler LLP
Andrew Scarpace	A-18-770467-C	Mary Riggs	Brenda Halverson	District Court	6/17/2022	8/22/2022	Wilson, Elser, Mostowitz, Edelman & Dickler, LLP

12. Nevada Counsel of Record for Petition in this matter is:
 (must be the same as the signature on the Nevada Counsel consent page)

Hal Taylor, #4399

First Name	Middle Name	Last Name	NV Bar #
		<i>West</i>	

who has offices at **Hal Taylor, Esq., 2551 *West* Lakeridge Shores, Reno, Washoe County, NV 89519, (775) 848-3141**

13. The following accurately represents the names and addresses of each party in this matter, WHETHER OR NOT REPRESENTED BY COUNSEL, and the names and addresses of each counsel of record who appeared for said parties: (You may attach as an Exhibit if necessary.)

NAME	MAILING ADDRESS
(1) SHARATH CHANDRA, Administrator, REAL ESTATE DIVISION, DEPT. OF BUSINESS & INDUSTRY, STATE OF NEVADA, C/O Deputy Attorney General Christal Keegan, 5420 Kietzke Lane, #202, Reno, NV 89511	
(2) Marshall Carrasco, c/o Attorney Hal Taylor	<i>West</i> 2551 Lakeridge Shores, Reno, Washoe County, NV 89519 and 1895 Plumas Street, Unit 3, Reno NV 89509

14. Petitioner agrees to comply with the provisions of Nevada Supreme Court Rule 42(3) and (13) and Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada in accordance with provisions as set forth in SCR 42(3) and (13). Petitioner respectfully requests that Petitioner be admitted to practice in the above-entitled court FOR THE PURPOSES OF THIS MATTER ONLY.

15. 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.

Creed of Professionalism and Civility

PREAMBLE

A lawyer should always show personal courtesy and professional integrity in the fullest sense of those terms.

In fulfilling our duty to represent a client vigorously as lawyers, we will honor our obligations to the administration of justice in a rational, peaceful, and efficient manner. We remain committed to the rule of law as the foundation for a just and peaceful society.

Lawyers should exhibit courtesy, candor, and cooperation when participating in the legal system and dealing with the public. In addition, lawyers should demonstrate civility, professional integrity, personal dignity, and respect because these qualities are essential to the fair administration of justice and conflict resolution.

The Rules of Professional Conduct cannot address every conflict that may arise. These standards honor the spirit of the Rules by balancing a lawyer's obligation to protect and pursue a client's legitimate interests zealously, within the bounds of the law, while maintaining a professional, courteous, and civil attitude toward all persons in the legal system, as well as avoid the appearance of impropriety. Violations of these standards may trigger sanctions under Rules 4.4, 8.4(b), or others.

CREED

1. We will strive to find harmony in our responsibilities as a representative of clients, as officers of the legal system, and as public citizens.
2. We will treat all participants of the legal system in a civil and courteous manner, not only in court, but also in all other written and oral communications refraining from disparaging personal remarks or acrimony.
3. We will not encourage or knowingly authorize any person under our control to engage in uncivil conduct.
4. We will not, absent good cause, attribute bad motives or improper conduct to other counsel nor bring the profession into disrepute by unfounded accusations of impropriety.
5. We will adhere to promises and agreements fairly reached, whether orally or in writing, in good faith. When reiterating oral promises or agreements in writing, we will fairly, completely, and in good faith, restate all elements of the parties' oral agreement.
6. We will confer early with other counsel to assess settlement possibilities. We will not falsely hold out the possibility of settlement to adjourn discovery or to delay trial.
7. We will stipulate to undisputed matters unless we have a good-faith basis not to stipulate.
8. We will try in good faith to resolve our objections with opposing counsel.
9. We will not time the filing or service of motions or pleadings in any way that unfairly limits another party's opportunity to respond nor will we request an extension of time without just cause.

10. We will consult other counsel regarding scheduling matters in a good-faith effort to avoid scheduling conflicts.
11. We will endeavor to accommodate previously scheduled dates for hearings, depositions, meetings, conferences, vacations, seminars, or other functions of other counsel.
12. We will explain to our clients that cooperation is the professional norm. We will explain how procedural agreements do not compromise the clients' interests.
13. We will draft document requests and interrogatories without placing an undue burden or expense on any party.
14. We will ensure that our clients respond to document requests and interrogatories without strained interpretation. We will not produce documents nor answer interrogatories in a manner designed to hide or obscure the existence of documents or information.
15. We will be punctual and prepared for all Court appearances so that all hearings, conferences, and trials may commence on time.
16. We will not engage in conduct that brings disorder or disruption to the legal proceeding. We will advise our clients and witnesses of the proper conduct expected and, to the best of our ability, prevent our clients and witnesses from creating disorder or disruption.

IN SUMMARY

In summary, consistent with the lawyer's oath, lawyers are expected to commit to the spirit and letter of these standards, affirming that these guidelines do not denigrate the lawyer's duty of zealous representation. Law schools and continuing legal education courses should incorporate these standards when teaching professionalism to law students and practicing lawyers alike. Lawyers should make copies available to clients and adjudicators should reinforce these standards in the courtroom to reinforce our obligation to maintain and foster these standards and to make it clear that incivility may hurt the client's case.

I, ROBERT F. MERLO, do hereby swear/affirm under penalty of perjury that the assertions of this application and the following statements are true:

- 1) That I am the Petitioner in the above-entitled matter.
- 2) That I have received a copy of, read, and will adhere to the Nevada Creed of Professionalism and Civility.
- 3) That I have read Supreme Court Rule (SCR) 42 and meet all requirements contained therein, including, without limitation, the requirements set forth in SCR 42(2), as follows:
 - (A) I am not a member of the State Bar of Nevada;
 - (B) I am not a resident of the State of Nevada;
 - (C) I am not regularly employed as a lawyer in the State of Nevada;
 - (D) I am not engaged in substantial business, professional, or other activities in the State of Nevada;
 - (E) I am a member in good standing and eligible to practice before the bar of any jurisdiction of the United States; and
 - (F) I have associated a lawyer who is an active member in good standing of the State Bar of Nevada as counsel of record in this action or proceeding.
- 4) That I have read the foregoing application and know the contents thereof; that the same is true of my own knowledge except as to those matters therein stated on information and belief, and as to the matter I believe them to be true.

That I further certify that I am subject to the jurisdiction of the Courts and disciplinary boards of this state 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; that I understand and shall comply with the standards of professional conduct required by members of the State Bar of Nevada; and that I am subject to the

disciplinary jurisdiction to the State Bar of Nevada with respect to any of my actions occurring in the course of such appearance.

If executed in Nevada: "I declare under penalty of perjury that the foregoing is true and correct."

Executed on (Date) _____

Attorney Signature _____

If executed outside of the state of Nevada, except as otherwise provided in NRS 53.250 to 53.390, inclusive, "I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct."

Executed on (Date) 2/1/24

Attorney Signature 

STATE OF TEXAS, COUNTY OF DALLAS

Know all men by these presents, that _____ of the County of _____ State of _____ do hereby certify that _____ of the County of _____ State of _____ is the true and correct owner of the _____ described in the _____ of the County of _____ State of _____

_____ of the County of _____ State of _____ do hereby certify that _____ of the County of _____ State of _____ is the true and correct owner of the _____ described in the _____ of the County of _____ State of _____

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ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
of the
SUPREME COURT OF ILLINOIS

One Prudential Plaza
130 East Randolph Drive, Suite 1500
Chicago, Illinois 60601-6219
(312) 565-2600 (800) 826-8625
Fax (312) 565-2320

3161 West White Oaks Drive, Suite 301
Springfield, IL 62704
(217) 546-3523 (800) 252-8048
Fax (217) 546-3785

Robert Francis Merlo
By Email: robert.merlo@wilsonelser.com

Chicago
Thursday, February 01, 2024

In re: Robert Francis Merlo
Attorney No. 6327312

To Whom It May Concern:

We have received a request for written verification of the status of Robert Francis Merlo for use by officials responsible for the review of the attorney's application for admission to the bar of another jurisdiction, or for a judicial position or for government employment. We have also received a Waiver and Authorization signed by the attorney. Pursuant to Commission policy, the following information is provided.

The records of the Clerk of the Supreme Court of Illinois and of this office reflect that Robert Francis Merlo was admitted to practice law in Illinois on November 9, 2017; is currently registered with this Commission and in good standing as an Illinois attorney; has never been disciplined or the subject of a disciplinary proceeding in this state; and is not the subject of any pending disciplinary investigations.

Very truly yours,
Lea S. Gutierrez
Administrator

By: */s/ Marissa Hernandez*
Marissa Hernandez
Deputy Registrar

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Exhibit B

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Exhibit B

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ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
of the
SUPREME COURT OF ILLINOIS

One Prudential Plaza
130 East Randolph Drive, Suite 1500
Chicago, Illinois 60601-6219
(312) 565-2600 (800) 826-8625
Fax (312) 565-2320

3161 West White Oaks Drive, Suite 301
Springfield, IL 62704
(217) 546-3523 (800) 252-8048
Fax (217) 546-3785

Robert Francis Merlo
By Email: robert.merlo@wilsonelser.com

Chicago
Thursday, February 01, 2024

In re: Robert Francis Merlo
Attorney No. 6327312

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Very truly yours,
Lea S. Gutierrez
Administrator

By: /s/ *Marissa Hernandez*
Marissa Hernandez
Deputy Registrar

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Exhibit C

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Exhibit C

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STAT

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE

Case No. CV23-01732
Dept. No. 6

Marshall Carrasco

vs.

Sharath Chandra

STATE BAR OF NEVADA STATEMENT PURSUANT TO SUPREME COURT RULE
42 (3) (b)

THE STATE BAR OF NEVADA, in response to the application of
Petitioner, submits the following statement pursuant to SCR42(3):

SCR42(6) Discretion. The granting or denial of a motion to associate
counsel pursuant to this rule by the court is discretionary. The
court, arbitrator, mediator, or administrative or governmental
hearing officer may revoke the authority of the person permitted to
appear under this rule. Absent special circumstances, repeated
appearances by any person or firm of attorneys pursuant to this rule
shall be cause for denial of the motion to associate such person.

(a) **Limitation.** It shall be presumed, absent special
circumstances, and only upon showing of good cause, that
more than 5 appearances by any attorney granted under
this rule in a 3-year period is excessive use of this
rule.

(b) **Burden on applicant.** The applicant shall have the
burden to establish special circumstances and good cause
for an appearance in excess of the limitation set forth
in subsection 6(a) of this rule. The applicant shall set
forth the special circumstances and good cause in an
affidavit attached to the original verified application.

1. DATE OF APPLICATION: 2/7/2024

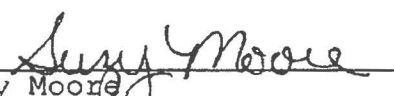
2. APPLYING ATTORNEY: Robert Francis Merlo, Esq.

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- 3. FIRM NAME AND ADDRESS: Wilson Elser Moskowitz Edelman & Dicker, LLP, 55 W. Monroe Street, Suite 3800, Chicago, IL 60603
- 4. NEVADA COUNSEL OF RECORD: Hal R. Taylor, Esq., Hal Taylor Attorney at Law, 2551 Lakeridge Shores West, Reno, NV 89519
- 5. There is no record of previous applications for appearance by petitioner within the past three (3) years.

DATED this February 15, 2024


Suzy Moore
Member Services Admin.
Pro Hac Vice Processor
STATE BAR OF NEVADA