

CLERK OF THE COURT
Electronically Filed
Apr 10 2017 03:35 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

1 NOAS
2 Anat Levy, Esq. (State Bar No. 12550)
3 ANAT LEVY & ASSOCIATES, P.C.
4 5841 E. Charleston Blvd., #230-421
5 Las Vegas, NV 89142
6 Phone: (310) 621-1199
7 E-mail: alevy96@aol.com; Fax: (310) 734-1538
8 Attorney for: DEFENDANTS VETERANS IN POLITICS INTERNATIONAL, INC. AND
9 STEVE W. SANSON
10
11
12
13
14
15
16
17
18

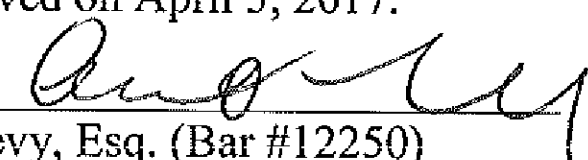
**DISTRICT COURT
CLARK COUNTY, NEVADA**

MARSHALL S. WILICK and WILICK LAW)	CASE NO. A-17-750171-C
GROUP,)	
)	DEPT. NO.: XVIII (18)
Plaintiffs,)	
)	
vs.)	
)	
STEVE W. SANSON; HEIDI J. HANUSA;)	
CHRISTINA ORTIZ; JOHNNY SPICER; DON)	
WOOLBRIGHTS; VETERNAS IN POLITICS)	
INTERNATIONAL, INC.; SANSON)	
CORPORATION; KAREN STEELMON; and)	
DOES 1 THROUGH X)	
)	
Defendants.)	

NOTICE OF APPEAL

21 PLEASE TAKE NOTICE that, pursuant to NRS §41.670(4), Defendants Veterans in
22 Politics International, Inc. and Steve W. Sanson, hereby appeal to the Supreme Court of Nevada
23 from the court's Order Denying the VIPI Defendants' Anti-SLAPP Special Motion to Dismiss
24 Pursuant to NRS 41.650 (the "Order"). The Order was entered on March 30, 2017. Notice of
25 Entry of the Order was filed on March 31, 2017 and served on April 3, 2017.

26 DATED: April 3, 2017

By: 
Anat Levy, Esq. (Bar #12250)
Anat Levy & Associates, P.C.
5841 E. Charleston Blvd., #230-421
Las Vegas, NV 89142
Cell: (310) 621-1199; Alevy96@aol.com

1 **CERTIFICATE OF SERVICE**

2
3 I am over the age of 18 and am not a party to the within action. On the date indicated
4 below I caused to be served a true and correct copy of the document entitled **NOTICE OF**
5 **APPEAL** on the below listed recipients by requesting the court's wiznet website to E-file and E-
6 serve such document at emails listed below.
7

8 Jennifer Abrams, Esq.
9 The Abrams & Mayo Law Firm
10 6252 S. Rainbow Blvd., Ste. 100
11 Las Vegas, NV 89118
12 (702) 222-4021
JVAGroup@theabramslawfirm.com

Alex Ghoubado, Esq. (Bar #10592)
G Law
703 S. 8th St.
Las Vegas, NV 89101
(702) 924-6553
alex@alexglaw.com

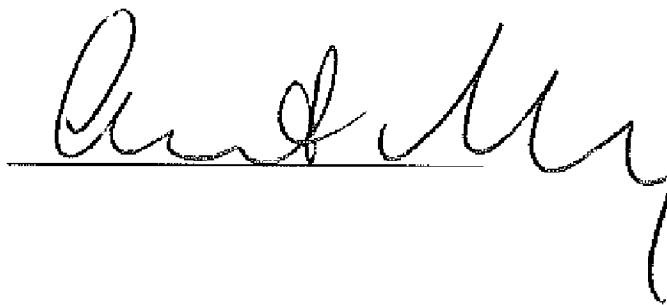
13 Courtesy Copy:

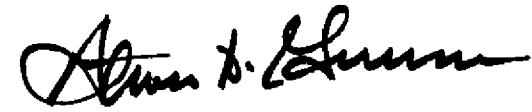
14 Maggie McLetchie, Esq.
15 McLetchie Shell
16 702 E. Bridger Ave., Ste. 520
17 Las Vegas, NV 89101
(702) 728-5300
Maggie@nvlitigation.com

Joshua Gilmore, Esq. (Bar #11576)
Bailey Kennedy
8984 Spanish Ridge Ave.,
Las Vegas, NV 89148-1302
(702) 562-8820
glimore@BaileyKennedy.com

18 I declare under penalty of perjury under the laws of the State of Nevada that the
19 foregoing is true and correct.

20 Executed this 3rd day of April, 2017, in Las Vegas, NV

21
22 
23
24
25
26
27
28



CLERK OF THE COURT

1 ASTA
2 Anat Levy, Esq. (State Bar No. 12550)
3 ANAT LEVY & ASSOCIATES, P.C.
4 5841 E. Charleston Blvd., #230-421
5 Las Vegas, NV 89142
6 Phone: (310) 621-1199
7 E-mail: alevy96@aol.com; Fax: (310) 734-1538
8 Attorney for: DEFENDANTS VETERANS IN POLITICS INTERNATIONAL, INC. AND
9 STEVE W. SANSON
10
11
12
13
14
15
16
17
18

**DISTRICT COURT
CLARK COUNTY, NEVADA**

MARSHALL S. WILICK and WILICK LAW)	CASE NO. A-17-750171-C
GROUP,)	
)	DEPT. NO.: XVIII (18)
Plaintiffs,)	
)	
vs.)	
)	
STEVE W. SANSON; HEIDI J. HANUSA;)	
CHRISTINA ORTIZ; JOHNNY SPICER; DON)	
WOOLBRIGHTS; VETERNAS IN POLITICS)	
INTERNATIONAL, INC.; SANSON)	
CORPORATION; KAREN STEELMON; and)	
DOES 1 THROUGH X)	
)	
Defendants.)	

CASE APPEAL STATEMENT

1. Name of appellant filing this case appeal statement:

Defendants Veterans in Politics International, Inc. ("VIPI") and Steve W. Sanson ("Sanson").

2. Identify the judge issuing the decision, judgment, or order appealed from:

Judge Richard Thompson, Senior Judge, Eighth Judicial District Court, Dept. 18.

3. Identify each appellant and the name and address of counsel for each

appellant:

Appellants:

Veterans in Politics International, Inc.

1 Steve W. Sanson

2 Counsel for Appellants VIPI and Sanson:

3 Anat Levy, Esq. (Bar #12250)
4 Anat Levy & Associates, P.C.
5 5841 E. Charleston Blvd., #230
6 Las Vegas, NV 89142
7 Cell: (310) 621-1199
8 Alevy96@aol.com

9 **4. Identify each respondent and the name and address of appellate counsel, if
10 known, for each respondent (if the name of a respondent's appellate counsel is unknown,
11 indicate as much and provide the name and address of that respondent's trial counsel):**

12 Respondents:

13 Marshal S. Willick
14 Willick Law Group

15 Counsel for Respondents:

16 I do not know who the Appellate Counsel for Respondents will be, but the trial counsels for both

17 Respondents are:

18 Joshua Gilmore, Esq. (Bar #11576)
19 Bailey Kennedy
20 8984 Spanish Ridge Ave.,
21 Las Vegas, NV 89148-1302
22 (702) 562-8820
23 glimore@BaileyKennedy.com

24 Jennifer Abrams, Esq.
25 The Abrams & Mayo Law Firm
26 6252 S. Rainbow Blvd., Ste. 100
27 Las Vegas, NV 89118
28 (702) 222-4021
JVAGroup@theabramslawfirm.com

**5. Indicate whether any attorney identified above in response to question 3 or 4 is not
licensed to practice law in Nevada and if so, whether the district court granted that
attorney permission to appear under SCR 42 (attach a copy of any district court order
granting such permission:**

1 All attorneys identified in response to question 3 or 4 above are licensed to practice law
2 in Nevada.

3 **6. Indicate whether appellant was represented by appointed or retained counsel in the**
4 **district court:**

5 Appellant was represented by retained counsel.

6 **7. Indicate whether appellant is represented by appointed or retained counsel on**
7 **appeal:**

8 Appellant is represented by retained counsel on appeal.

9 **8. Indicate whether appellant was granted leave to proceed in forma pauperis, and the**
10 **date of entry of the district court order granting such leave:**

11 Appellant did not seek, and was not granted, leave to proceed in pro per.

12 **9. Indicate the date the proceedings commenced in the district court (e.g., date**
13 **complaint, indictment, information or petition was filed):**

14 Complaint was filed on 1/27/2017.

15 **10. Provide a brief description of the nature of the action and result in the district court,**
16 **including the type of judgment or order being appealed and the relief granted by the**
17 **district court:**

18 On January 27, 2017, Defendants Veterans in Politics International, Inc. ("VIPI) and its
19 President, Steve Sanson, were sued by Plaintiffs Marshal Willick, Esq. and his law firm, Willick
20 Law Group, for five statements that VIPI made online about Plaintiffs from December 25, 2016
21 to January 14, 2017.

22 Each of the statements was made in good faith, was either true, privileged or constituted
23 non-actionable opinion (including being hyperlinked to the relevant source documents), and were
24 made in furtherance of Defendants' free speech rights. Further, each statement was directly
25 related to an issue of "public concern" – a lawyer's (Willick's) views on then-pending legislation
26 on which he commented before the legislature; the lawyer's behavior towards an opponent being
27 found to constitute "defamation per se" by a Virginia federal judge; the lawyer's losing results in
28 a Supreme Court appeal in which he sought to overturn existing family law precedence; the fact

1 that a sex offender was employed at the lawyer's family law firm; and the lawyer's actions in
2 seeking to enforce a lien for over \$100,000 in fees in a case in which the parties divided their
3 property before even retaining him. In addition, Defendants believe that Plaintiff Willick and his
4 firm are "public figures" as defined by the Supreme Court in Gertz v. Robert Welch, Inc., infra.,
5 thereby heightening the public concern of the statements at issue.

6 On February 24, 2017, Defendants timely moved to dismiss the suit pursuant to Nevada's
7 anti-SLAPP statutes, NRS §§ 41.635 – 41.670 (the "Motion").

8 On March 30, 2017, the Court entered an Order denying the Motion.

9 This appeal follows, pursuant to NRS §41.670 (4), which states "[i]f the court denies the
10 special motion to dismiss filed pursuant to NRS 41.660, an interlocutory appeal lies to the
11 Supreme Court."

12 **11. Indicate whether the case has previously been the subject of an appeal to or original**
13 **writ proceeding in the Supreme Court and, if so, the caption and Supreme Court docket**
14 **number of the prior proceeding:**

15 No prior Supreme Court proceeding.

16 **12. Indicate whether this appeal involves child custody or visitation:**

17 No it does not.

18 **13. If this is a civil case, indicate whether this appeal involves the possibility of**
19 **settlement:**

20 No.

21 DATED: April 3, 2017

By: 

Anat Levy, Esq. (Bar #12250)

Anat Levy & Associates, P.C.

5841 E. Charleston Blvd., #230-421

Las Vegas, NV 89142

Cell: (310) 621-1199; Alevy96@aol.com

CERTIFICATE OF SERVICE

I am over the age of 18 and am not a party to the within action. On the date indicated below I caused to be served a true and correct copy of the document entitled **CASE APPEAL STATEMENT** on the below listed recipients by requesting the court's wiznet website to E-file and E-serve such document at emails listed below.

Jennifer Abrams, Esq.
The Abrams & Mayo Law Firm
6252 S. Rainbow Blvd., Ste. 100
Las Vegas, NV 89118
(702) 222-4021
JVAGroup@theabramslawfirm.com

Alex Ghoubado, Esq. (Bar #10592)
G Law
703 S. 8th St.
Las Vegas, NV 89101
(702) 924-6553
alex@alexglaw.com

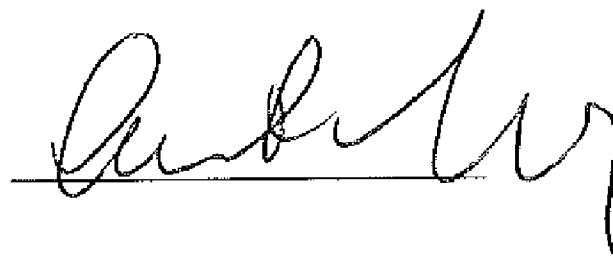
Courtesy Copy:

Maggie McLetchie, Esq.
McLetchie Shell
702 E. Bridger Ave., Ste. 520
Las Vegas, NV 89101
(702) 728-5300
Maggie@nvlitigation.com

Joshua Gilmore, Esq. (Bar #11576)
Bailey Kennedy
8984 Spanish Ridge Ave.,
Las Vegas, NV 89148-1302
(702) 562-8820
glimore@BaileyKennedy.com

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed this 3rd day of April, 2017, in Las Vegas, NV



DEPARTMENT 18
CASE SUMMARY
CASE NO. A-17-750171-C

Marshal Willick, Plaintiff(s)
vs.
Steve Sanson, Defendant(s)

§
§
§
§
§

Location: **Department 18**
Judicial Officer: **Barker, David**
Filed on: **01/27/2017**
Case Number History:
Cross-Reference Case Number: **A750171**

CASE INFORMATION

Case Type: **Intentional Misconduct**
Case Flags: **Appealed to Supreme Court**

DATE

CASE ASSIGNMENT

Current Case Assignment

Case Number	A-17-750171-C
Court	Department 18
Date Assigned	02/28/2017
Judicial Officer	Barker, David

PARTY INFORMATION













Plaintiff	Willick Law Group	<i>Lead Attorneys</i> Abrams, Jennifer V. <i>Retained</i> 702-222-4021(W)
	Willick, Marshal S	Abrams, Jennifer V. <i>Retained</i> 702-222-4021(W)
Defendant	Hanusa, Heidi J Removed: 04/03/2017 Inactive	
	Ortiz, Christina Removed: 04/03/2017 Inactive	
	Sanson Corporation Removed: 04/03/2017 Inactive	
	Sanson, Steve W	Levy, Annat R., ESQ <i>Retained</i> 310-621-1199(W)
	Spicer, Johnny Removed: 04/03/2017 Inactive	
	Steelmon, Karen Removed: 04/03/2017 Inactive	
	Veterans in Politics International Inc	Levy, Annat R., ESQ <i>Retained</i> 310-621-1199(W)
	Woolbright, Don Removed: 04/03/2017 Inactive	

DATE













EVENTS & ORDERS OF THE COURT

INDEX












DEPARTMENT 18
CASE SUMMARY
CASE NO. A-17-750171-C

01/27/2017	 Complaint Filed By: Plaintiff Willick, Marshal S <i>Complaint for Damages</i>
02/06/2017	 Declaration Filed By: Plaintiff Willick, Marshal S <i>Declaration of Service</i>
02/08/2017	 Declaration Filed By: Plaintiff Willick, Marshal S <i>Declaration of Service</i>
02/08/2017	 Declaration Filed By: Plaintiff Willick, Marshal S <i>Declaration of Service</i>
02/08/2017	 Declaration Filed By: Plaintiff Willick, Marshal S <i>Declaration of Service</i>
02/08/2017	 Declaration Filed By: Plaintiff Willick, Marshal S <i>Declaration of Service</i>
02/08/2017	 Declaration Filed By: Plaintiff Willick, Marshal S <i>Declaration of Service</i>
02/10/2017	 Declaration Filed By: Plaintiff Willick, Marshal S <i>Declaration of Service</i>
02/17/2017	 Motion to Dismiss Filed By: Defendant Veterans in Politics International Inc <i>Anti-Slapp Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.</i>
02/23/2017	 Peremptory Challenge Filed by: Plaintiff Willick, Marshal S <i>Peremptory Challenge of Judge</i>
02/24/2017	 Minute Order (3:00 AM) (Judicial Officer: Cadish, Elissa F.) <i>Minute Order Re: Dept. VI Recusal</i>
02/24/2017	 Initial Appearance Fee Disclosure Filed By: Defendant Sanson, Steve W; Defendant Veterans in Politics International Inc
02/24/2017	 Motion to Dismiss Filed By: Defendant Sanson, Steve W; Defendant Veterans in Politics International Inc <i>Motion to Dismiss for Failure to State a Claim (NRCP 12(b)(5))</i>
02/24/2017	 Motion to Dismiss Filed By: Defendant Sanson, Steve W; Defendant Veterans in Politics International Inc <i>Motion to Dismiss Ninth Cause of Action for Copyright Infringement for Lack of Subject Matter Jurisdiction (NRCP 12(b)(1))</i>


DEPARTMENT 18
CASE SUMMARY
CASE NO. A-17-750171-C

02/24/2017	 Motion to Strike Filed By: Defendant Sanson, Steve W; Defendant Veterans in Politics International Inc
02/24/2017	 Request for Judicial Notice Filed By: Defendant Sanson, Steve W; Defendant Veterans in Politics International Inc <i>Request for Judicial Notice in Support of Motion to Dismiss for Failure to State a Claim</i>
02/27/2017	 Minute Order (10:45 AM) (Judicial Officer: Crockett, Jim)
02/28/2017	 Minute Order (3:00 AM) (Judicial Officer: Jones, David M)
02/28/2017	 Minute Order (10:00 AM) (Judicial Officer: Adair, Valerie)
03/01/2017	 Notice of Department Reassignment <i>Notice of Department Reassignment</i>
03/07/2017	 Opposition and Countermotion Filed By: Plaintiff Willick, Marshal S <i>(3/8/2017 Please See Errata) Opposition to Anti-Slapp Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; and Countermotion for Attorney's Fees and Costs</i>
03/08/2017	 Errata Filed By: Plaintiff Willick, Marshal S <i>Errata to Opposition to Anti-Slapp Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; and Countermotion for Attorney's Fees and Costs</i>
03/08/2017	 Exhibits Filed By: Plaintiff Willick, Marshal S <i>Exhibits to Opposition to Anti-Slapp Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; and Countermotion for Attorney's Fees and Costs</i>
03/09/2017	 Supplemental Filed by: Defendant Veterans in Politics International Inc <i>Supplemental Declaration of Steve Sanson in Support of Anti-SLAPP Motion</i>
03/09/2017	 Reply in Support Filed By: Defendant Veterans in Politics International Inc <i>Reply in Support of Defendants' Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.</i>
03/13/2017	 Notice of Association of Counsel Filed By: Plaintiff Willick, Marshal S <i>Notice of Association of Counsel</i>
03/13/2017	 Motion to Strike Filed By: Defendant Veterans in Politics International Inc <i>Defendants' Motion to Strike and Response to Plaintiffs' Untimely Supplemental Brief</i>
03/13/2017	 Affidavit Filed By: Plaintiff Willick, Marshal S <i>Affidavit of Marshal S. Willick in Support of Plaintiff's Opposition to Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; and Countermotion for Attorney's Fees and Costs</i>

DEPARTMENT 18
CASE SUMMARY
CASE NO. A-17-750171-C

03/14/2017	Motion to Dismiss (9:00 AM) (Judicial Officer: Thompson, Charles) Events: 02/17/2017 Motion to Dismiss <i>Defendants' Anti-Slapp Special Motion to Dismiss Pursuant to NRS 41.650</i>
03/14/2017	Opposition and Countermotion (9:00 AM) (Judicial Officer: Thompson, Charles) Events: 03/07/2017 Opposition and Countermotion <i>Plaintiffs' Opposition to Anti-Slapp Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; and Countermotion for Attorney's Fees and Costs</i>
03/14/2017	 All Pending Motions (9:00 AM) (Judicial Officer: Thompson, Charles)
03/20/2017	 Response Filed by: Plaintiff Willick, Marshal S <i>Plaintiffs' Response to Defendants Steve W. Sanson and Veterans In Politics International, Inc.'s (i) Motion to Dismiss 9th Cause of Action; (ii) Motion to Dismiss for Failure to State a Claim; (iii) Motion to Strike</i>
03/26/2017	 Declaration Filed By: Defendant Veterans in Politics International Inc <i>Declaration of Anat Levy; Proposed Order Attached Thereto.</i>
03/28/2017	 Response Filed by: Plaintiff Willick, Marshal S <i>Plaintiffs' Response to the VIPI Defendants' Motion to Strike</i>
03/29/2017	 Declaration Filed By: Plaintiff Willick, Marshal S <i>Declaration of Service</i>
03/30/2017	 Order Denying Filed By: Plaintiff Willick, Marshal S <i>Order Denying: (i) The VIPI Defendants' Anti-Slapp Special Motion to Dismiss Pursuant to NRS 41.650 et seq.; (ii) the Willick Parties' Countermotion for Attorney's Fees and Costs</i>
03/31/2017	 Notice of Entry of Order Filed By: Plaintiff Willick, Marshal S <i>Notice of Entry of Order Denying: (I) The VIPI Defendants' Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et seq.; (ii) The Willick Parties' Countermotion for Attorney's Fees and Costs</i>
03/31/2017	 Notice of Entry of Order Filed By: Defendant Sanson, Steve W <i>Notice of Entry of Order</i>
04/03/2017	 Notice of Appeal Filed By: Defendant Veterans in Politics International Inc <i>Notice of Appeal</i>
04/03/2017	 Case Appeal Statement Filed By: Defendant Veterans in Politics International Inc <i>Case Appeal Statement</i>
04/03/2017	 First Amended Complaint Filed By: Plaintiff Willick, Marshal S <i>First Amended Complaint</i>

DEPARTMENT 18
CASE SUMMARY
CASE NO. A-17-750171-C

04/04/2017	Motion to Dismiss (9:00 AM) (Judicial Officer: Thompson, Charles) Events: 02/24/2017 Motion to Dismiss <i>Defendants' Motion to Dismiss for Failure to State a Claim (NRCP 12(b)(5))</i>
04/04/2017	Motion to Dismiss (9:00 AM) (Judicial Officer: Thompson, Charles) Events: 02/24/2017 Motion to Dismiss <i>Defendants' Motion to Dismiss Ninth Cause of Action for Copyright Infringement for Lack of Subject Matter Jurisdiction (NRCP 12(b)(1))</i>
04/04/2017	Motion to Strike (9:00 AM) (Judicial Officer: Thompson, Charles) Events: 02/24/2017 Motion to Strike <i>Defendants' Motion to Strike</i>
04/04/2017	 All Pending Motions (9:00 AM) (Judicial Officer: Thompson, Charles)

DATE	FINANCIAL INFORMATION
	Defendant Sanson, Steve W Total Charges 30.00 Total Payments and Credits 30.00 Balance Due as of 4/5/2017 0.00
	Defendant Veterans in Politics International Inc Total Charges 247.00 Total Payments and Credits 247.00 Balance Due as of 4/5/2017 0.00
	Plaintiff Willick Law Group Total Charges 30.00 Total Payments and Credits 30.00 Balance Due as of 4/5/2017 0.00
	Plaintiff Willick, Marshal S Total Charges 720.00 Total Payments and Credits 720.00 Balance Due as of 4/5/2017 0.00

DISTRICT COURT CIVIL COVER SHEET

CLARK

County, Nevada

A-17-750171-C

X I X

Case No. _____

(Assigned by Clerk's Office)

I. Party Information (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone): MARSHAL S. WILLICK and WILLICK LAW GROUP 3591 E. Bonanza Road Las Vegas, Nevada 89110 (702) 438-4100	Defendant(s) (name/address/phone): (See attached)
Attorney (name/address/phone): Jennifer V. Abrams, Esq. (NV Bar # 7575) 6252 S. Rainbow Blvd., Suite 100 Las Vegas, Nevada 89118 (702) 222-4021	Attorney (name/address/phone): _____

II. Nature of Controversy (please select the one most applicable filing type below)

Civil Case Filing Types

Real Property Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	Negligence <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Torts Other Torts <input type="checkbox"/> Product Liability <input checked="" type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate Probate (select case type and estate value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate Estate Value <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	Construction Defect & Contract Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	Judicial Review/Appeal Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ Civil Writ <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ		Other Civil Filing Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters

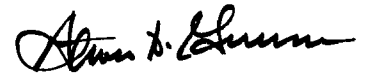
Business Court filings should be filed using the Business Court civil coversheet.

01/26/2017

Date

Signature of initiating party or representative

See other side for family-related case filings.



CLERK OF THE COURT

1 **ORDR**

DENNIS L. KENNEDY

2 Nevada Bar No. 1462

JOSHUA P. GILMORE

3 Nevada Bar No. 11576

BAILEY ♦ KENNEDY

4 8984 Spanish Ridge Avenue

Las Vegas, Nevada 89148-1302

5 Telephone: 702.562.8820

Facsimile: 702.562.8821

6 DKennedy@BaileyKennedy.com

JGilmore@BaileyKennedy.com

7 JENNIFER V. ABRAMS

8 Nevada Bar No. 7575

THE ABRAMS & MAYO LAW FIRM

9 6252 South Rainbow Blvd., Ste. 100

Las Vegas, NV 89118

10 Telephone: 702.222.4021

Facsimile: 702.248.9750

11 JVAGroup@theabramslawfirm.com

12 *Attorneys for Plaintiffs*

Marshal S. Willick and Willick Law Group

DISTRICT COURT

CLARK COUNTY, NEVADA

13
14
15
16
17 MARSHAL S. WILICK and WILICK LAW
GROUP,

18 Plaintiffs,

19 vs.

20 STEVE W. SANSON; HEIDI J. HANUSA;
21 CHRISTINA ORTIZ; JOHNNY SPICER; DON
WOOLBRIGHT; VETERANS IN POLITICS
22 INTERNATIONAL, INC.; SANSON
CORPORATION; KAREN STEELMON; and
23 DOES I through X,

24 Defendants.

Case No. A-17-750171-C
Dept. No. XVIII

**ORDER DENYING: (i) THE VIPI
DEFENDANTS' ANTI-SLAPP SPECIAL
MOTION TO DISMISS PURSUANT TO
NRS 41.650 ET SEQ.; (ii) THE WILICK
PARTIES' COUNTERMOTION FOR
ATTORNEY'S FEES AND COSTS; AND
(iii) THE VIPI DEFENDANTS'
MOTION TO STRIKE** (pw)

25
26 This matter came before the Court (the Honorable Charles Thompson presiding) for hearing
27 on the 14th day of March, 2017, at 9:00 AM, in Department 18, on (i) Defendants Steve W. Sanson
28 ("Mr. Sanson") and Veterans in Politics International, Inc.'s ("VIPI") (together, the "VIPI

1 Defendants”) Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et seq. (the “Special
2 Motion to Dismiss”); and (ii) Plaintiffs Marshal S. Willick (“Mr. Willick”) and Willick Law Group’s
3 (“Willick Law”) (together, the “Willick Parties”) Countermotion for Attorney’s Fees and Costs (the
4 “Countermotion”). Joshua P. Gilmore, Esq. of Bailey ♦ Kennedy and Jennifer V. Abrams, Esq. of
5 The Abrams & Mayo Law Firm appeared on behalf of the Willick Parties. Anat Levy, Esq. of Anat
6 Levy & Associates, P.C. appeared on behalf of the VIPI Defendants.

7 The Court, having examined the memoranda of the parties and the records and documents on
8 file, heard argument of counsel, and being fully advised of the premises, and good cause appearing,
9 hereby makes the following Findings of Fact, Conclusions of Law, and Order with regard to the
10 Special Motion to Dismiss and Countermotion (and related Motion to Strike):

11 **FINDINGS OF FACT**

12 1. On January 27, 2017, the Willick Parties filed their Complaint against the VIPI
13 Defendants (among others).

14 2. On February 17, 2017, the VIPI Defendants filed their Special Motion to Dismiss,
15 arguing that the defamatory statements at issue in the Complaint fall within the ambit of NRS
16 41.637, in part because Mr. Willick is a public figure or limited purpose public figure, and that the
17 Willick Parties lack prima facie evidence supporting their claims.

18 3. On March 7, 2017, the Willick Parties filed their Opposition to the Special Motion to
19 Dismiss, arguing that the defamatory statements at issue in the Complaint do not fall within the
20 ambit of NRS 41.637; but, even if they did, they have presented prima facie evidence supporting
21 their claims. The Willick Parties also denied that Mr. Willick is a public figure or limited purpose
22 public figure. The Willick Parties separately filed their Countermotion, requesting an award of
23 attorneys’ fees and costs pursuant to NRS 41.670(2).

24 4. On March 9, 2017, the VIPI Defendants filed their Reply in Support of their Special
25 Motion to Dismiss, together with Mr. Sanson’s Supplemental Declaration, and their Opposition to
26 the Countermotion.

1 (4) the focus of the speaker's conduct should be the public interest rather than a mere
2 effort to gather ammunition for another round of private controversy; and

3 (5) a person cannot turn otherwise private information into a matter of public interest
4 simply by communicating it to a large number of people.

4 *Id.*, at ___, 389 P.3d at 268 (citation omitted).

5 4. If the Court determines that "the issue is of public interest, it must next determine
6 whether the communication was made 'in a place open to the public or in a public forum.'" *Id.*
7 (quoting NRS 41.673(4)). Finally, the Court must determine whether the communication was
8 "truthful or [was] made without knowledge of its falsehood." *Id.* (quoting NRS 41.637(4)).

9 5. Courts do not "simply rubber stamp" assertions by a defendant that a plaintiff's
10 claims fall within the ambit of the anti-SLAPP statute. *Flatley v. Mauro*, 139 P.3d 2, 13 (Cal. 2006).
11 Rather, the defendant must establish, by a preponderance of the evidence, that each claim is based on
12 a communication as specifically defined under NRS 41.637. NRS 41.660(3)(a); *see also Century 21*
13 *Chamberlain & Assocs. v. Haberman*, 92 Cal. Rptr. 3d 249, 256 (Cal. Ct. App. 2009) (stating that
14 the defendant bears the initial burden of establishing that each cause of action in the complaint arises
15 from "activity protected by the anti-SLAPP statute").

16 6. If the defendant is unable to meet its initial burden of proof, the burden does not shift
17 to the plaintiff to establish "with prima facie evidence a probability of prevailing on [each] claim."
18 NRS 41.660(3)(b); *see also Commonwealth Energy Corp. v. Investor Data Exchange, Inc.*, 1 Cal.
19 Rptr. 3d 390, 393 (Cal. Ct. App. 2003) ("The point is, if the moving defendant cannot meet the
20 threshold showing, then the fact that he or she might be able to otherwise prevail on the merits under
21 the 'probability' step is irrelevant.").

22 7. If the defendant meets its initial burden of proof, the burden shifts to the plaintiff to
23 put forth "prima facie evidence" of a probability of prevailing on each claim. NRS 41.660(3)(b). In
24 other words, the plaintiff must show that each claim has "minimal merit." *Soukup v. Law Offices of*
25 *Herbert Hafif*, 139 P.3d 30, 51 (Cal. 2006).

26 8. Based on these legal principles, the Court finds that the VIPI Defendants have failed
27 to meet their initial burden of proof with regard to their Special Motion to Dismiss, for the following
28 reasons:

a. First, having considered the *Shapiro* factors, the Court finds that the VIPI Defendants have not established, by a preponderance of the evidence, that each claim in the Complaint is based on a communication involving “an issue of public interest.”

b. Second, in light of the Nevada Supreme Court's holding in *Doe v. Brown*, No. 62752, 2015 WL 3489404 (2015), the Court finds that Mr. Willick is not a public figure or limited purpose public figure.

c. Third, upon review of the defamatory statements at issue in the Complaint, the Court finds that the VIPI Defendants have not established, by a preponderance of the evidence, that each was truthful or was made without knowledge of its falsehood.

9. Because the VIPI Defendants have failed to meet their initial burden of proof, the Court need not address whether the Willick Parties have presented prima facie evidence supporting their claims. *See, e.g., Stenehjem v. Sareen*, 173 Cal. Rptr. 3d 173, 191 n.19 (Cal. Ct. App. 2014) (“Because we have concluded that Stenehjem did not meet his threshold showing that the activity underlying the allegations of the Cross-Complaint was protected under the anti-SLAPP statute, we need not consider the second prong, i.e., whether the record demonstrates that Sareen established a probability of prevailing.”).

10. The Court does not find that the Special Motion to Dismiss was “frivolous or vexatious,” and therefore, the Court declines to award fees and costs to the Willick Parties.

11. In light of the Court's ruling, the Motion to Strike is deemed moot.

12. At the end of the March 14, 2017 hearing, the VIPI Defendants orally moved for a stay of this proceeding pending an appeal, which the Court denied as premature.

13. Any conclusion of law set forth herein more appropriately designated as a finding of fact shall be so designated.

/ / /

///

ORDER

Based on the foregoing Findings of Fact and Conclusions of Law, and good cause appearing,

1 THE COURT HEREBY ORDERS that the Special Motion to Dismiss shall be, and hereby
2 is, DENIED.

3 THE COURT HEREBY FURTHER ORDERS that the Countermotion shall be, and hereby
4 is, DENIED.

5 ~~THE COURT HEREBY FURTHER ORDERS that the Motion to Strike shall be, and hereby~~
6 ~~is, DENIED as moot.~~


7 IT IS SO ORDERED.

8 DATED this 29th day of March, 2017.

9
10 
11 DISTRICT COURT JUDGE

12 Submitted by:

13 BAILEY ♦ KENNEDY

14 
15 By: _____
16 DENNIS L. KENNEDY
JOSHUA P. GILMORE

17 and

18 JENNIFER V. ABRAMS
19 Nevada Bar No. 7575
20 THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100

21 *Attorneys for Plaintiffs,*
22 Marshal S. Willick and Willick Law Group
23
24
25
26
27
28


CLERK OF THE COURT

NEOJ
DENNIS L. KENNEDY
Nevada Bar No. 1462
JOSHUA P. GILMORE
Nevada Bar No. 11576
KELLY B. STOUT
Nevada Bar No. 12105
BAILEY ♦ KENNEDY
8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148-1302
Telephone: 702.562.8820
Facsimile: 702.562.8821
DKennedy@BaileyKennedy.com
JGilmore@BaileyKennedy.com

JENNIFER V. ABRAMS
Nevada Bar No. 7575
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Ste. 100
Las Vegas, Nevada 89118
Telephone: 702.222.4021
Facsimile: 702.248.9750
JVAGroup@theabramslawfirm.com

Attorneys for Plaintiffs
Marshal S. Willick and Willick Law Group

DISTRICT COURT
CLARK COUNTY, NEVADA

MARSHAL S. WILICK and WILICK LAW
GROUP,

Plaintiffs,

vs.

STEVE W. SANSON; HEIDI J. HANUSA;
CHRISTINA ORTIZ; JOHNNY SPICER; DON
WOOLBRIGHT; VETERANS IN POLITICS
INTERNATIONAL, INC.; SANSON
CORPORATION; KAREN STEELMON; and
DOES I through X,

Defendants.

Case No. A-17-750171-C
Dept. No. XVIII

**NOTICE OF ENTRY OF ORDER
DENYING: (i) THE VIPI DEFENDANTS'
ANTI-SLAPP SPECIAL MOTION TO
DISMISS PURSUANT TO NRS 41.650 ET
SEQ.; (ii) THE WILICK PARTIES'
COUNTERMOTION FOR
ATTORNEY'S FEES AND COSTS**

///

///

///

1 PLEASE TAKE NOTICE that an Order Denying: (i) The VIPI Defendants' Anti-Slapp
2 Special Motion to Dismiss Pursuant to NRS 41.650 et seq.; (ii) The Willick Parties Countermotion
3 for Attorney's Fees and Costs was entered in the above-entitled action on the 30th day of March,
4 2017, a true and correct copy of which is attached hereto as Exhibit 1.

5 DATED this 31st of March, 2017.

6 BAILEY ♦ KENNEDY

7
8 By: /s/ Dennis L. Kennedy

9 DENNIS L. KENNEDY

10 JOSHUA P. GILMORE

11 KELLY B. STOUT

12 and

13 JENNIFER V. ABRAMS

14 Nevada Bar No. 7575

15 **THE ABRAMS & MAYO LAW FIRM**

16 6252 South Rainbow Blvd., Ste. 100

17 Las Vegas, NV 89118

18 *Attorneys for Plaintiffs*

19 Marshal S. Willick and Willick Law Group

CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ♦ KENNEDY and that on the 31st day of March, 2017, service of the foregoing Notice of Entry of Order Denying: (i) The VIPI Defendants’ Anti-Slapp Special Motion to Dismiss Pursuant to NRS 41.650 et seq.; (ii) The Willick Parties Countermotion for Attorney’s Fees and Costs was made by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

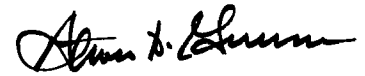
ANAT LEVY ANAT LEVY & ASSOCIATES, P.C. 5841 E. Charleston Boulevard, #230-421 Las Vegas, NV 89142	Email: alevy96@aol.com <i>Attorneys for Defendants</i> VETERANS IN POLITICS INTERNATIONAL, INC. and STEVE SANSON
---	---

ALEX GHIBAUDO G LAW 703 S. 8 th Street Las Vegas, NV 89101	Email: alex@alexglaw.com <i>Attorneys for Defendants</i> VETERANS IN POLITICS INTERNATIONAL, INC. and STEVE SANSON
---	---

/s/ Susan Russo
Employee of BAILEY ♦ KENNEDY

EXHIBIT 1

EXHIBIT 1



CLERK OF THE COURT

1 **ORDR**

DENNIS L. KENNEDY

2 Nevada Bar No. 1462

JOSHUA P. GILMORE

3 Nevada Bar No. 11576

BAILEY ♦ KENNEDY

4 8984 Spanish Ridge Avenue

Las Vegas, Nevada 89148-1302

5 Telephone: 702.562.8820

Facsimile: 702.562.8821

6 DKennedy@BaileyKennedy.com

JGilmore@BaileyKennedy.com

7 JENNIFER V. ABRAMS

8 Nevada Bar No. 7575

THE ABRAMS & MAYO LAW FIRM

9 6252 South Rainbow Blvd., Ste. 100

Las Vegas, NV 89118

10 Telephone: 702.222.4021

Facsimile: 702.248.9750

11 JVAGroup@theabramslawfirm.com

12 *Attorneys for Plaintiffs*

Marshal S. Willick and Willick Law Group

DISTRICT COURT

CLARK COUNTY, NEVADA

13
14
15
16 MARSHAL S. WILICK and WILICK LAW
17 GROUP,

18 Plaintiffs,

19 vs.

20 STEVE W. SANSON; HEIDI J. HANUSA;
21 CHRISTINA ORTIZ; JOHNNY SPICER; DON
22 WOOLBRIGHT; VETERANS IN POLITICS
23 INTERNATIONAL, INC.; SANSON
CORPORATION; KAREN STEELMON; and
DOES I through X,

24 Defendants.

Case No. A-17-750171-C
Dept. No. XVIII

**ORDER DENYING: (i) THE VIPI
DEFENDANTS' ANTI-SLAPP SPECIAL
MOTION TO DISMISS PURSUANT TO
NRS 41.650 ET SEQ.; (ii) THE WILICK
PARTIES' COUNTERMOTION FOR
ATTORNEY'S FEES AND COSTS; AND
(iii) THE VIPI DEFENDANTS'
MOTION TO STRIKE** (pw)

25
26 This matter came before the Court (the Honorable Charles Thompson presiding) for hearing
27 on the 14th day of March, 2017, at 9:00 AM, in Department 18, on (i) Defendants Steve W. Sanson
28 ("Mr. Sanson") and Veterans in Politics International, Inc.'s ("VIPI") (together, the "VIPI

1 Defendants”) Anti-SLAPP Special Motion to Dismiss Pursuant to NRS 41.650 et seq. (the “Special
2 Motion to Dismiss”); and (ii) Plaintiffs Marshal S. Willick (“Mr. Willick”) and Willick Law Group’s
3 (“Willick Law”) (together, the “Willick Parties”) Countermotion for Attorney’s Fees and Costs (the
4 “Countermotion”). Joshua P. Gilmore, Esq. of Bailey ♦ Kennedy and Jennifer V. Abrams, Esq. of
5 The Abrams & Mayo Law Firm appeared on behalf of the Willick Parties. Anat Levy, Esq. of Anat
6 Levy & Associates, P.C. appeared on behalf of the VIPI Defendants.

7 The Court, having examined the memoranda of the parties and the records and documents on
8 file, heard argument of counsel, and being fully advised of the premises, and good cause appearing,
9 hereby makes the following Findings of Fact, Conclusions of Law, and Order with regard to the
10 Special Motion to Dismiss and Countermotion (and related Motion to Strike):

11 **FINDINGS OF FACT**

12 1. On January 27, 2017, the Willick Parties filed their Complaint against the VIPI
13 Defendants (among others).

14 2. On February 17, 2017, the VIPI Defendants filed their Special Motion to Dismiss,
15 arguing that the defamatory statements at issue in the Complaint fall within the ambit of NRS
16 41.637, in part because Mr. Willick is a public figure or limited purpose public figure, and that the
17 Willick Parties lack prima facie evidence supporting their claims.

18 3. On March 7, 2017, the Willick Parties filed their Opposition to the Special Motion to
19 Dismiss, arguing that the defamatory statements at issue in the Complaint do not fall within the
20 ambit of NRS 41.637; but, even if they did, they have presented prima facie evidence supporting
21 their claims. The Willick Parties also denied that Mr. Willick is a public figure or limited purpose
22 public figure. The Willick Parties separately filed their Countermotion, requesting an award of
23 attorneys’ fees and costs pursuant to NRS 41.670(2).

24 4. On March 9, 2017, the VIPI Defendants filed their Reply in Support of their Special
25 Motion to Dismiss, together with Mr. Sanson’s Supplemental Declaration, and their Opposition to
26 the Countermotion.

1 (4) the focus of the speaker's conduct should be the public interest rather than a mere
2 effort to gather ammunition for another round of private controversy; and

3 (5) a person cannot turn otherwise private information into a matter of public interest
4 simply by communicating it to a large number of people.

4 *Id.*, at ___, 389 P.3d at 268 (citation omitted).

5 4. If the Court determines that "the issue is of public interest, it must next determine
6 whether the communication was made 'in a place open to the public or in a public forum.'" *Id.*
7 (quoting NRS 41.673(4)). Finally, the Court must determine whether the communication was
8 "truthful or [was] made without knowledge of its falsehood." *Id.* (quoting NRS 41.637(4)).

9 5. Courts do not "simply rubber stamp" assertions by a defendant that a plaintiff's
10 claims fall within the ambit of the anti-SLAPP statute. *Flatley v. Mauro*, 139 P.3d 2, 13 (Cal. 2006).
11 Rather, the defendant must establish, by a preponderance of the evidence, that each claim is based on
12 a communication as specifically defined under NRS 41.637. NRS 41.660(3)(a); *see also Century 21*
13 *Chamberlain & Assocs. v. Haberman*, 92 Cal. Rptr. 3d 249, 256 (Cal. Ct. App. 2009) (stating that
14 the defendant bears the initial burden of establishing that each cause of action in the complaint arises
15 from "activity protected by the anti-SLAPP statute").

16 6. If the defendant is unable to meet its initial burden of proof, the burden does not shift
17 to the plaintiff to establish "with prima facie evidence a probability of prevailing on [each] claim."
18 NRS 41.660(3)(b); *see also Commonwealth Energy Corp. v. Investor Data Exchange, Inc.*, 1 Cal.
19 Rptr. 3d 390, 393 (Cal. Ct. App. 2003) ("The point is, if the moving defendant cannot meet the
20 threshold showing, then the fact that he or she might be able to otherwise prevail on the merits under
21 the 'probability' step is irrelevant.").

22 7. If the defendant meets its initial burden of proof, the burden shifts to the plaintiff to
23 put forth "prima facie evidence" of a probability of prevailing on each claim. NRS 41.660(3)(b). In
24 other words, the plaintiff must show that each claim has "minimal merit." *Soukup v. Law Offices of*
25 *Herbert Hafif*, 139 P.3d 30, 51 (Cal. 2006).

26 8. Based on these legal principles, the Court finds that the VIPI Defendants have failed
27 to meet their initial burden of proof with regard to their Special Motion to Dismiss, for the following
28 reasons:

1 a. First, having considered the *Shapiro* factors, the Court finds that the VIPI
2 Defendants have not established, by a preponderance of the evidence, that each claim in the
3 Complaint is based on a communication involving “an issue of public interest.”

4 b. Second, in light of the Nevada Supreme Court’s holding in *Doe v. Brown*, No.
5 62752, 2015 WL 3489404 (2015), the Court finds that Mr. Willick is not a public figure or
6 limited purpose public figure.

7 c. Third, upon review of the defamatory statements at issue in the Complaint, the
8 Court finds that the VIPI Defendants have not established, by a preponderance of the
9 evidence, that each was truthful or was made without knowledge of its falsehood.

10 9. Because the VIPI Defendants have failed to meet their initial burden of proof, the
11 Court need not address whether the Willick Parties have presented prima facie evidence supporting
12 their claims. *See, e.g., Stenehjem v. Sareen*, 173 Cal. Rptr. 3d 173, 191 n.19 (Cal. Ct. App. 2014)
13 (“Because we have concluded that Stenehjem did not meet his threshold showing that the activity
14 underlying the allegations of the Cross-Complaint was protected under the anti-SLAPP statute, we
15 need not consider the second prong, i.e., whether the record demonstrates that Sareen established a
16 probability of prevailing.”).

17 10. The Court does not find that the Special Motion to Dismiss was “frivolous or
18 vexatious,” and therefore, the Court declines to award fees and costs to the Willick Parties.

19 11. In light of the Court’s ruling, the Motion to Strike is deemed moot.

20 12. At the end of the March 14, 2017 hearing, the VIPI Defendants orally moved for a
21 stay of this proceeding pending an appeal, which the Court denied as premature.

22 13. Any conclusion of law set forth herein more appropriately designated as a finding of
23 fact shall be so designated.

24 ///

25 ///

26 **ORDER**

27 Based on the foregoing Findings of Fact and Conclusions of Law, and good cause appearing,
28

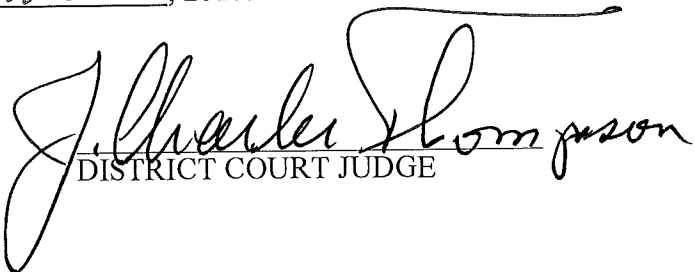
1 THE COURT HEREBY ORDERS that the Special Motion to Dismiss shall be, and hereby
2 is, DENIED.

3 THE COURT HEREBY FURTHER ORDERS that the Countermotion shall be, and hereby
4 is, DENIED.

5 ~~THE COURT HEREBY FURTHER ORDERS that the Motion to Strike shall be, and hereby~~
6 ~~is, DENIED as moot.~~

7 IT IS SO ORDERED.

8 DATED this 29th day of March, 2017.

9
10 
11 DISTRICT COURT JUDGE

12 Submitted by:

13 BAILEY ♦ KENNEDY

14
15 By: 

DENNIS L. KENNEDY
JOSHUA P. GILMORE

16 and

17
18 JENNIFER V. ABRAMS
Nevada Bar No. 7575
19 THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100

20 Attorneys for Plaintiffs,
21 Marshal S. Willick and Willick Law Group

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Intentional Misconduct

COURT MINUTES

February 24, 2017

A-17-750171-C	Marshal Willick, Plaintiff(s)
	vs.
	Steve Sanson, Defendant(s)

February 24, 2017	3:00 AM	Minute Order
--------------------------	----------------	---------------------

HEARD BY: Cadish, Elissa F.	COURTROOM: RJC Courtroom 15B
------------------------------------	-------------------------------------

COURT CLERK: Keith Reed

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- In light of this Court's relationship with Defendant, including endorsement and significant support by Defendant of this Court's campaigns and nomination, this Court's impartiality might reasonably be questioned. Accordingly, pursuant to Rule 2.11(A) of the Revised Nevada Code of Judicial Conduct, this Court hereby disqualifies herself from hearing this matter.

CLERK'S NOTE: Minutes CORRECTED to reflect any mention of Plaintiff, as Defendant.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Intentional Misconduct

COURT MINUTES

February 27, 2017

A-17-750171-C	Marshal Willick, Plaintiff(s) vs. Steve Sanson, Defendant(s)
---------------	--

February 27, 2017 10:45 AM Minute Order

HEARD BY: Crockett, Jim

COURTROOM: Phoenix Building Courtroom -
11th Floor

COURT CLERK: Katrina Hernandez

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- Court stated due to most of the Defednants' endorsements and significant support of the campaign of Jim Crockett, this Court's impartiality might be reasonably questioned. Accordingly, pursuant to Rule 2.11(A) of the Revised Nevada Code of Judicial Conduct, Judge Crockett disqualifies himself from hearing this matter.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Intentional Misconduct

COURT MINUTES

February 28, 2017

A-17-750171-C Marshal Willick, Plaintiff(s)
vs.
Steve Sanson, Defendant(s)

February 28, 2017 3:00 AM Minute Order

HEARD BY: Jones, David M

COURTROOM: RJC Courtroom 03D

COURT CLERK: Natalie Ortega

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- Based on Nevada Code of Judicial Conduct, rule 2.11, Judge David M. Jones must RECUSE himself from this case.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Intentional Misconduct

COURT MINUTES

February 28, 2017

A-17-750171-C	Marshal Willick, Plaintiff(s) vs. Steve Sanson, Defendant(s)
---------------	--

February 28, 2017	10:00 AM	Minute Order
--------------------------	-----------------	---------------------

HEARD BY: Adair, Valerie	COURTROOM: Chambers Chambers
---------------------------------	--

COURT CLERK: Jill Chambers

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- As this Court is personally acquainted with Deft. Sanson, has appeared on his radio show and has attended Deft s events, in accordance with rule 2.11 (A) and to avoid the appearance of impropriety and implied bias this Court hereby disqualifies itself and ORDERS the case be reassigned at random.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Intentional Misconduct

COURT MINUTES

March 14, 2017

A-17-750171-C	Marshal Willick, Plaintiff(s)
	vs.
	Steve Sanson, Defendant(s)

March 14, 2017 9:00 AM All Pending Motions

HEARD BY: Thompson, Charles **COURTROOM:** Phoenix Building Courtroom - 11th Floor

COURT CLERK: Alan Castle

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:	Abrams, Jennifer V.	Attorney
	Gilmore, Joshua P., ESQ	Attorney
	Sanson, Steve W	Defendant
	Veterans in Politics International Inc	Defendant
	Willick Law Group	Plaintiff
	Willick, Marshal S	Plaintiff

JOURNAL ENTRIES

- Defendants' Anti-Slapp Special Motion to Dismiss Pursuant to NRS 41.650 et. seq. ... Plaintiffs' Opposition to Anti-Slapp Special Motion to Dismiss Pursuant to NRS 41.650 et. seq.; and Countermotion for Attorney's Fees and Costs

Arguments by counsel. Court stated its Findings the statute does not apply in this instance and ORDERED, Defendants' Anti-Slapp Special Motion to Dismiss is DENIED. FURTHER ORDERED, Plaintiffs' Countermotion for Attorney's Fees and Costs is DENIED. Ms. Levy requested stay of proceedings to pursue an appeal to Supreme Court. Objection by Mr. Gilmore who requested counsel file a written motion. Court not inclined to address the oral request noting there are still matters pending which may have merit. Mr. Gilmore to prepare the order within 10 days and

distribute a filed copy to all parties involved in this matter.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Intentional Misconduct

COURT MINUTES

April 04, 2017

A-17-750171-C	Marshal Willick, Plaintiff(s) vs. Steve Sanson, Defendant(s)
---------------	--

April 04, 2017 9:00 AM All Pending Motions

HEARD BY: Thompson, Charles **COURTROOM:** Phoenix Building Courtroom - 11th Floor

COURT CLERK: Alan Castle

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:	Abrams, Jennifer V.	Attorney
	Gilmore, Joshua P., ESQ	Attorney
	Levy, Annat R., ESQ	Attorney
	Sanson, Steve W	Defendant
	Veterans in Politics International Inc	Defendant
	Willick Law Group	Plaintiff
	Willick, Marshal S	Plaintiff

JOURNAL ENTRIES

- Defendants' Motion to Dismiss for Failure to State a Claim (NRCP 12(b)(5)) Defendants' Motion to Dismiss Ninth Cause of Action for Copyright Infringement for Lack of Subject Matter Jurisdiction (NRCP 12(b)(1)) Defendants' Motion to Strike

Mr. Gilmore advised Plaintiffs filed an amended complaint, yesterday, following some of this Court's observations last hearing. Court notes courtesy copy not received until before court. Ms. Levy notes nothing received from Plaintiff. Mr. Gilmore advised regarding updated causes of action in the Amended Complaint. Based on the filing of the amended complaint, Court Finds today's motions are MOOT.

Ms. Levy filed a notice of appeal and will be filing a motion for stay. COURT GRANTED submission of the motion for stay on shortened time. Colloquy regarding time for Defendants' review of the amended complaint. Pursuant to Stipulation of parties, Defendants shall have 30 days to answer the amended complaint.



EIGHTH JUDICIAL DISTRICT COURT CLERK'S OFFICE
NOTICE OF DEFICIENCY
ON APPEAL TO NEVADA SUPREME COURT

ANAT LEVY, ESQ.
5841 E. CHARLESTON BLVD., #230-421
LAS VEGAS, NV 89142

DATE: April 5, 2017
CASE: A-17-750171-C

RE CASE: MARSHAL S. WILICK; MARSHAL S. WILICK, LLC DBA WILICK LAW GROUP
vs. STEVE W. SANSON; VETERANS IN POLITICS INTERNATIONAL, INC.

NOTICE OF APPEAL FILED: April 3, 2017

YOUR APPEAL HAS BEEN SENT TO THE SUPREME COURT.

PLEASE NOTE: DOCUMENTS NOT TRANSMITTED HAVE BEEN MARKED:

- ☒ \$250 – Supreme Court Filing Fee (Make Check Payable to the Supreme Court)**
 - If the \$250 Supreme Court Filing Fee was not submitted along with the original Notice of Appeal, it must be mailed directly to the Supreme Court. The Supreme Court Filing Fee will not be forwarded by this office if submitted after the Notice of Appeal has been filed.
- ☐ \$24 – District Court Filing Fee (Make Check Payable to the District Court)**
- ☒ \$500 – Cost Bond on Appeal (Make Check Payable to the District Court)**
 - NRAP 7: Bond For Costs On Appeal in Civil Cases
- ☐ Case Appeal Statement
 - NRAP 3 (a)(1), Form 2
- ☐ Order
- ☐ Notice of Entry of Order

NEVADA RULES OF APPELLATE PROCEDURE 3 (a) (3) states:

"The district court clerk must file appellant's notice of appeal despite perceived deficiencies in the notice, including the failure to pay the district court or Supreme Court filing fee. **The district court clerk shall apprise appellant of the deficiencies in writing**, and shall transmit the notice of appeal to the Supreme Court in accordance with subdivision (e) of this Rule with a notation to the clerk of the Supreme Court setting forth the deficiencies. Despite any deficiencies in the notice of appeal, the clerk of the Supreme Court shall docket the appeal in accordance with Rule 12."

Please refer to Rule 3 for an explanation of any possible deficiencies.

***Per District Court Administrative Order 2012-01, in regards to civil litigants, "...all Orders to Appear in Forma Pauperis expire one year from the date of issuance." You must reapply for in Forma Pauperis status.*

Certification of Copy

State of Nevada }
County of Clark } SS:

I, Steven D. Grierson, the Clerk of the Court of the Eighth Judicial District Court, Clark County, State of Nevada, does hereby certify that the foregoing is a true, full and correct copy of the hereinafter stated original document(s):

NOTICE OF APPEAL; CASE APPEAL STATEMENT; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET; ORDER DENYING: (i) THE VIPI DEFENDANTS' ANTI-SLAPP SPECIAL MOTION TO DISMISS PURSUANT TO NRS 41.650 ET SEQ., (ii) THE WILICK PARTIES' COUNTERMOTION FOR ATTORNEY'S FEES AND COSTS; NOTICE OF ENTRY OF ORDER DENYING (i) THE VIPI DEFENDANTS' ANTI-SLAPP SPECIAL MOTION TO DISMISS PURSUANT TO NRS 41.650 ET SEQ., (ii) THE WILICK PARTIES' COUNTERMOTION FOR ATTORNEY'S FEES AND COSTS; DISTRICT COURT MINUTES; NOTICE OF DEFICIENCY

MARSHAL S. WILICK; MARSHAL S.
WILICK, LLC DBA WILICK LAW
GROUP,

Plaintiff(s),

vs.

STEVE W. SANSON; VETERANS IN
POLITICS INTERNATIONAL, INC.,

Defendant(s),

Case No: A-17-750171-C

Dept No: XVIII

now on file and of record in this office.

IN WITNESS THEREOF, I have hereunto
Set my hand and Affixed the seal of the
Court at my office, Las Vegas, Nevada
This 5 day of April 2017.

Steven D. Grierson, Clerk of the Court



Amanda Hampton, Deputy Clerk