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Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF NEVADA

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

Appellants,

vs.

MARSHAL S. WILLICK and
WILLICK LAW GROUP,

Respondents.

Supreme Court No. 72778

District Court No. A-17-750171-C

**DECLARATION OF ANAT
LEVY IN REPLY TO
RESPONDENTS' OPPOSITION
TO THE FILING OF AN
AMICUS BRIEF BY THE
REPORTERS COMMITTEE
FOR FREEDOM OF THE
PRESS AND THE NEVADA
PRESS ASSOCIATION**

I, ANAT LEVY, hereby declare as follows:

1. I am an attorney at law duly licensed to practice before all of the Courts in the State of Nevada. I represent Appellants Steve Sanson and Veterans in Politics International Inc. ("VIPI") in this case. I make this

declaration based on my personal knowledge and if called upon as a witness, I would and could testify competently as to the matters set forth herein.

2. I am submitting this declaration to refute the false narrative in Ms. Abrams' Opposition to the Reporters Committee for Freedom of the Press and the Nevada Press Association's (collectively, "Amici") request to file an amicus brief in this case. Unfortunately, Ms. Abrams did not even bother to discuss this matter with me before filing her opposition brief which is replete with erroneous assumptions and leaps to conclusions that I somehow lied to this Court and to her.

3. I have been sole counsel for Appellants in this case. Neither I nor Appellants have been consulting with or have retained counsel for Amici, Marc Randazza, in this matter.

4. My communications with Mr. Randazza over the past year (or more) have been very limited. Appellants and I communicated with Mr. Randazza in early 2017 when Appellants initially considered hiring his firm to represent them in the Abrams v. Schneider case (Supreme Court case no. 73838), in which Ms. Abrams is personally suing Mr. Sanson and VIPI for defamation. In April 2017, in my capacity as Director of CLE for the Entertainment Law Section of the Nevada Bar I asked Mr. Randazza if he

would like to give a CLE seminar to the Entertainment Law Section. And, recently, shortly after reading Respondent's Opposition in this Appeal, I called Mr. Randazza once and briefly discussed with him the proper standard of review for anti-SLAPP motions under the latest iteration of Nevada's anti-SLAPP laws. He agreed with me that the proper standard of review is "de novo" and not "abuse of discretion."

5. At no time did I ask Mr. Randazza to file an amicus brief on behalf of his clients or to benefit Appellants, nor did he coordinate with me or involve me in such filing, nor did he ask me to nor did I volunteer to obtain an extension of time on Appellants' reply brief to facilitate the filing of an amicus brief.

6. On February 21, 2018, I emailed Ms. Abrams requesting a 30 day extension of time to file Appellant's reply brief. My request was based solely on my professional time constraints as recited in the Stipulation, as I have recently had to travel to Los Angeles for extended periods of time for work and need to continue doing so over the next few months. My request to Ms. Abrams had nothing to do with Mr. Randazza, his clients, or the need for any additional time for him to file an amicus brief. Indeed, he would not have even needed such an extension since he filed Amici's motion and proposed brief the

next day on February 22, 2018 and Appellants' reply brief was not even due until March 9, 2018 (it is now due on April 9, 2018).

7. On February 22, I sent my draft stipulation to Ms. Abrams. On February 27, I reminded her to give me comments. On February 28, she changed the stipulation and sent it back to me. We continued to discuss its terms until Friday, March 2, and on Monday, March 5, I filed it with this Court, well after Mr. Randazza had already filed his motion on behalf of Amici. In fact since I was traveling and working in L.A. at the time, I had not even realized that Mr. Randazza had filed a motion when I was communicating with Ms. Abrams about the stipulation. If Ms. Abrams had any questions about the stipulation or its purported coordination with Amici's motion, she had plenty of time to bring it to my attention and discuss it with me, which she did not do.

8. Further, I am perplexed that Ms. Abrams' is even arguing against the filing of an amicus brief that would benefit *her*. Ms. Abrams is simultaneously seeking to overturn an anti-SLAPP decision issued against her, and in favor of Mr. Sanson and VIPI, in the Abrams case. I would think that she would prefer the standard of review in these cases to be "de novo" instead of "abuse of discretion," and at the very least, would want to ensure that the

proper standard of review is applied since it would affect both pending cases (not to mention future anti-SLAPP cases).

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

Executed this 7th day of March, 2018, in Las Vegas, Clark County, Nevada.


ANAT LEVY

CERTIFICATE OF ELECTRONIC 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 electronic copy of the document entitled **DECLARATION OF ANAT LEVY IN REPLY TO RESPONDENTS' OPPOSITION TO THE FILING OF AN AMICUS BRIEF BY THE REPORTERS COMMITTEE FOR FREEDOM OF THE PRESS AND THE NEVADA PRESS ASSOCIATION** on the below listed recipients via the master transmission list with the Nevada Supreme Court:

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

Executed this 7th day of March, 2018, in Las Vegas, NV


