

Save THE Date

*4th Annual
Valentine's Day
Ball*

PLAZA HOTEL & CASINO
SATURDAY, FEBRUARY 10TH
DINNER: 5:00PM

Sponsorship Opportunities, call or text
702-576-5585
Email: VIPIPresident@cs.com



[Our YouTube Channel](#)

[WAR declared on Clark County Nevada Family Court System](#)

UPCOMING EVENTS

[WEBSITE](#) [NEWS](#) [GOALS AND VALUES](#) [OFFICERS](#) [CONTACT US](#)



Veterans In Politics International Inc.

702-283-8088

devildog1285@cs.com

www.veteransinpolitics.org

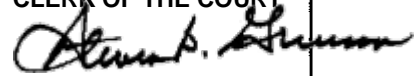
SIGN UP FOR EMAILS

Confirm that you like this.

Click the "Like" button.

EXHIBIT 6

EXHIBIT 6



1
2 ORDR

3
4 DISTRICT COURT

5 CLARK COUNTY, NEVADA

6
7 IRINA ANSELL,)

8 Plaintiff,)

9 v.)

CASE NO. D-15-521960-D

DEPT NO. Q

10 DOUGLAS ANSELL,)

11 Defendant.)

Date of Hearing: August 30, 2017

Time of Hearing: 2:00 p.m.

12
13
14 ORDER OF RECUSAL

15 This matter came on for a hearing before this Court on August 30, 2017. The
16 matters before the Court included:

- 17
18 (1) Non-Party, Veterans In Politics International, Inc. and Steve Sanson's
19 Motion to Quash Subpoena Served on Verizon Wireless (Jul.26, 2017);
20 (2) Non-Parties Steve Sanson, Veterans In Politics International, Inc., and
21 Sanson Corporation's Motion to Quash Subpoena Duces Tecum and
22 Deposition Subpoena Served on Steve Sanson on July 22, 2017 (Aug. 4,
23 2017); and
24 (3) This Court's Amended Notice of Rescheduling of Hearing and Setting
25 Calendar Call (Aug. 28, 2017).

26 Associated motions and papers were considered and reviewed by the Court,
27 including requests for attorney's fees and Plaintiff's Motion to Compel (Aug. 10,
28 2017). The discovery issues previously were assigned to be heard by the Discovery
Commissioner on August 20, 2017. The Discovery Commissioner, however, recused

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

and the matter was placed on this Court's calendar on the above-referenced date. Plaintiff did not appear personally, but was represented by her attorney, Marshal Willick, Esq. Defendant did not appear personally, but was represented by his attorney, John Jones, Esq. Steve Sanson appeared personally and with his attorney, Anat Levy, Esq.

As previously noted, this Court reviewed a multitude of papers filed by and on behalf of Plaintiff and Mr. Sanson or Veterans In Politics International (hereinafter referred to individually and collectively as "Mr. Sanson") in preparation for the hearing. This Court's preparation included review of the Omnibus Supplemental Declaration of Steve Sanson in Support of: Motions to Quash Subpoenas Duces Tecum Served on Verizon Wireless and Steve Sanson and Deposition Subpoena Served on Steve on July 22, 2017; Motion for Attorneys Fees (Aug. 22, 2017) (hereinafter referred to as Mr. Sanson's "Sworn Declaration"). Therein, Mr. Sanson described his off-the-record communications with this Court about this matter. Upon reviewing Mr. Sanson's Sworn Declaration, this Court determined that it should recuse from any further proceedings in this matter. This determination is based on the findings stated on the record at the August 30, 2017 hearing and additional findings stated herein.

It is undisputed that Defendant designated Mr. Sanson as a witness. Moreover, although Mr. Jones argued it was unlikely, Defendant could not definitively rule out the possibility that Mr. Sanson might be called as a witness in future proceedings. It also is undisputed that Mr. Sanson made specific reference to this case in a communication directed at this Court off the record. In fact, this Court scheduled an

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

immediate hearing in May 2017 to address Mr. Sanson's ex-parte communication with the Court.¹ Mr. Sanson's filing of his Sworn Declaration, however, was the first instance in which this Court became aware that Mr. Sanson had stated in writing the nature of his communications with the Court.

This Court noted that it was unaware of any legal authority that would excuse someone from a deposition who had been designated as a witness in the matter. This Court also noted its concern that the Subpoena Duces Tecum served on Mr. Sanson was overbroad and should be narrowed significantly. Because, however, this Court recognized the conflict created by Mr. Sanson's Sworn Declaration, the Court did not rule on the discovery motions and determined that the Court's recusal from this matter was appropriate.

In Mr. Sanson's Sworn Declaration, he acknowledged that he asked the Court off the record: "Why do you allow Marshal Willick to get away with so much

...
...
...
...

¹At the May 17, 2017 hearing, this Court disclosed Mr. Sanson's communications with the Court. This Court also noted for the record the nature of the Court's relationship with Mr. Sanson in the past. This has included this Court's endorsement by Veterans in Politics as a candidate for office and his prior professional communications about general issues (including Mr. Sanson repeatedly stating that he believed this Court should serve as the presiding judge in the Family Division). At the time of the May 2017 communication, Mr. Sanson was aware that litigation before the Court should never be discussed. Thus, any communication about a specific case was completely unexpected.

1
2 crap in Doug Ansell's case?"² For sake of completeness, the text messages and
3 telephone communication between Mr. Sanson and the Court took place as follows:

- 4 ● On May 11, 2017 at 8:20 p.m., Mr. Sanson texted: "Judge I need to
5 speak to you."
- 6 ● On May 12, 2017 at 6:52 a.m., the Court texted Mr. Sanson: "What do
7 you need to talk about?"
- 8 ● On May 12, 2017 at 9:29 a.m., Mr. Sanson responded with: "Call me at
9 your convenience or we can grab a cup of tea."
- 10 ● The Court called Mr. Sanson on May 13, 2017. After prefatory remarks
11 that included Mr. Sanson declaring that this Court should be the
12 presiding judge in the family division, Mr. Sanson, without prompting,
13 asked: "Why do you allow Marshal Willick to get away with so much
14 "crap" in Doug Ansell's case?"

15 ²On a number of occasions, this Court has lamented that *both* parties have engaged in,
16 to borrow Mr. Sanson's term, "crap" during this case. This Court repeatedly has chastised both
17 sides for their practice of hyperbole and exaggeration. Mr. Willick has almost incessantly
18 argued that this Court has allowed Defendant (Mr. Ansell) to get away with "crap" without
19 repercussion. Both Mr. Willick and Mr. Jones are adept at selectively handpicking those areas
20 of perceived wrongdoing of the other side and advocating through their myopic lenses. On Mr.
21 Jones' part, this was exemplified during the August 30, 2017 hearing through his argument that
22 the Court had given Plaintiff a "free pass" with respect to her alleged violation of the Order to
23 Seal Records (Oct. 16, 2015) (hereinafter referred to as the "Sealing Order"). The Sealing
24 Order *drafted and submitted by Defendant (Mr. Ansell)*, ordered that "all papers, records,
25 proceedings and evidence, including exhibits and transcripts of testimony in the above-entitled
26 matter, be, and the same hereby are, sealed and shall not be opened to inspection *except by the*
27 *parties* and their attorneys, or when required as evidence in another action or proceeding."
28 (Emphasis added). Mr. Jones' argument in Court notwithstanding, this matter was adjudicated
by the Court. *See* Order (Aug. 30, 2016). Thus, the Sealing Order *drafted and submitted by*
Defendant (Mr. Ansell), did not prohibit the conduct about which Defendant complained. NRS
125.110 provides that the papers sealed "shall not be open to inspection except *to* the parties
and their attorneys." The Sealing Order *prepared by Defendant* changed the statutory language
and provided that the papers sealed "shall not be opened to inspection except *by* the parties
and their attorneys." Recognizing the error of his own drafting, Defendant (Mr. Ansell)
submitted a second Order to Seal Records (Nov. 23, 2016). Mr. Jones knew these facts when
he lambasted the Court during the August 30, 2017 hearing for purportedly allowing Plaintiff
to violate a Sealing Order that did not proscribe the alleged conduct. Apart from these
examples of "crap," the Court has endured "crap" from *both* parties throughout this litigation.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- After immediately terminating the call, this Court texted Mr. Sanson as follows: “Please do not ever talk to me again about a pending case before me. I hold you in higher esteem than that. I’m sorry to end the call so abruptly. My integrity means too much to me than to be influenced by others outside of the courtroom and it shakes the very core of our system when anyone communicates with a judicial officer in this fashion. It simply cannot happen. I know that you know that and I have always trusted your judgment in that regard.”
- Mr. Sanson’s immediate text response reads: “You asked me a question because of our relationship I gave you my honest answer, so you can understand what direction we are headed.”

This Court scheduled a hearing immediately (heard on May 17, 2017) to disclose the improper communication. Based on Mr. Sanson’s testimony on August 30, 2017, he admitted that his communication with the Court was not intended to relay specific factual information about the Ansell case. When offered the opportunity to provide specific examples of “crap” perpetrated by Mr. Willick (such as a miscalculation by Mr. Willick, a fabricated fact, or some other specific example of “crap”), Mr. Sanson had nothing specific. As such, *the only purpose of his communication with the Court was to influence and intimidate the Court through a corrupt communication outside of court.*

Mr. Sanson could have limited his communication with the Court to a *general* accusation that Mr. Willick “gets away with crap,” and left it at that.³ If Mr. Sanson’s sole motivation was merely to attack Mr. Willick *in general* and not to influence the

³Based on the papers filed herein, this Court is aware that litigation is pending between Mr. Willick and Mr. Sanson. This Court’s familiarity with this civil matter is limited to the disclosures contained in the papers filed in the Ansell matter. The animosity resulting from this civil litigation is palpable. Nevertheless, this animosity is not an excuse to attempt to manipulate and intimidate this Court – *particularly in regards to a specific case.*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Court about a specific case, he could have done so. Although such communication remains improper, it is more egregious that Mr. Sanson *knowingly and intentionally identified Doug Ansell's case*. It also is significant that Mr. Sanson's response was not to offer an apology, or to assure the Court that he would refrain from doing so again. Even at the August 30, 2017 hearing, Mr. Sanson remained unapologetic. In fact, his demeanor and conduct was defiant, even lashing out at Mr. Willick to the point of being admonished by the Court. Instead of apologizing to the Court, his follow-up communication was a veiled threat to the Court. This threat by Mr. Sanson, as stated by Mr. Sanson and interpreted by the Court, was to harass the Court and to hurl baseless and defamatory accusations about the Court.

Mr. Sanson argues that his organization "exposes public corruption and injustices." Further, despite the fact that Mr. Ansell designated Mr. Sanson as *his* witness, Mr. Sanson states with emphasis that neither he nor VIPI "*have anything to do with this case.*" To reiterate for the record, Mr. Sanson intentionally interjected himself into this matter by communicating with the Court in reference to this specific case. Plaintiff understandably and justifiably has sought to determine the full extent of such off-the-record communications. To be clear, however, Mr. Sanson's involvement in this matter is not about exposing "injustice" or corruption. Mr. Sanson acknowledged that he had never met Plaintiff and proclaimed that he meant her no "ill will." Indeed, Mr. Sanson appeared to be unaware that Defendant (Doug Ansell) was the prevailing party with respect to the child custody issues in this case – an issue that is of the highest significance in *most* cases.

1
2 As noted previously, when given the opportunity at the August 30, 2017 hearing
3 to explain the “crap” that was occurring in the Ansell matter, Mr. Sanson was unable
4 to identify any singular fact. As such, notwithstanding his self-proclaimed faux cover
5 of seeking to “expose injustice and corruption,” Mr. Sanson’s sole motivation for
6 communicating with this Court was to intimidate and harass the Court. Mr. Sanson
7 proudly proclaims that he has “declared war” on the Family Court. There is no doubt
8 that the courts are under attack and that the entire judiciary of this great State of
9 Nevada is on notice that, behind that false banner of “justice and corruption” is an
10 individual and group who seek to manipulate, intimidate and control. The arsenal of
11 weapons that Mr. Sanson utilizes include attempts to manipulate, intimidate and
12 control the judicial process through off-the-record communications. This case has
13 exposed the reality of his tactics.
14
15
16

17 Rather than apologize for his unethical and corrupt conduct, *Mr. Sanson has the*
18 *audacity to blame this Court for his improper communication.* Specifically, Mr. Sanson
19 alleges under oath in his Sworn Declaration that his off-the-record *question* to the Court
20 was somehow an answer to a same-day related conversation. The timing of this entire
21 narrative offered by Mr. Sanson is significant as it belies Mr. Sanson’s story. Mr.
22 Sanson alleges in his Sworn Declaration that his originating text message took place on
23 the *same day* as a conversation with the Court in the courtroom (i.e., May 11, 2017).
24 To this end, Mr. Sanson’s narrative suggests that his text message was intended merely
25 to follow-up on a conversation earlier that same day. Mr. Sanson’s narrative, however,
26 is a *factual impossibility*. In this regard, May 11, 2017 was this Court’s Chamber
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Calendar day. No hearings were scheduled in Department Q on May 11, 2017. There was no conversation on May 11, 2017 as Mr. Sanson has alleged.⁴ Regardless, even if Mr. Sanson's sworn recitation of facts is believed, his communication with the Court *remains improper.*

What should be frightening to this Court (and members of the Nevada judiciary in general), is that Mr. Sanson refused to acknowledge at the August 30, 2017 hearing that his communication with the Court about a pending case was inappropriate. Specifically, Mr. Sanson, through his counsel, suggested it was the Court's fault based on the earlier conversation cited above. This Court reiterates that it is inappropriate to communicate with a judicial officer off the record about a pending case – *at any time and under any circumstances.* Mr. Sanson's attempts to deflect blame to the Court are appalling.

This Court's abrupt termination of the telephone call and immediate text to Mr. Sanson that his communication was inappropriate was not Mr. Sanson's desired response or reaction from the Court. It is now obvious that Mr. Sanson was looking for a response from the Court more along the lines of: "I'm so sorry Mr. Sanson, I'll make sure that Mr. Willick doesn't get his way," or, "I'm so sorry Mr. Sanson, I'll make sure Mr. Ansell comes out on top," or even, "message received Mr. Sanson." *Is there*

⁴This is not simply a matter of "oops, I got the date wrong." Any change to the date changes the entire narrative and creates a logical disconnection in time. This Court's staff checked the videotape of the hearings in all cases held in Department Q on the preceding Monday, Tuesday, and Wednesday of that same week and was unable to find Mr. Sanson in the gallery at the beginning or conclusion of any case.

1
2 *anything more corrupt than the influence Mr. Sanson sought to exert over the Court?*

3 And he proclaims that he seeks to expose corruption? Because this Court called him
4 out on the inappropriateness of his communication and refused to kowtow and cower
5 to his manipulation and control, Mr. Sanson predictably let the Court know that his
6 wrath was coming out against the Court. This type of threat to any judicial officer
7 strikes at the very core of the integrity of the judicial process. Moreover, such
8 threatening behavior is an attempt to manipulate and control judicial officers if they
9 do not succumb to Mr. Sanson's desired result.
10
11

12 Mr. Jones argued that there is no evidence that Defendant had anything to do
13 with Mr. Sanson's communication with the Court or that he put Mr. Sanson "up to it."
14 Mr. Jones is correct that there was no testimony offered that indicates that Defendant
15 is responsible for Mr. Sanson's behavior. Defendant did not appear at the hearing to
16 offer his version of events. Although this Court is unable to attribute Mr. Sanson's
17 actions to Defendant directly, this Court notes that Mr. Sanson's communication with
18 the Court was not the first, nor the second, occasion in which the Court has received
19 outside communications about Defendant.⁵
20
21

22
23 ⁵This Court previously disclosed at a prior hearing that an individual recently employed
24 by Defendant was this Court's direct ecclesiastical leader (Kurt Teshima). This Court disclosed
25 to the parties that the Court holds Mr. Teshima in high esteem. These disclosures were made
26 for full transparency in the event that either party desired that the Court recuse from the
27 matter. Mr. Willick offered (as an offer of proof) at the August 30, 2017 hearing that
28 Defendant, *together with Mr. Sanson*, had a breakfast meeting with Mr. Teshima. As an
additional offer of proof, when Defendant and Mr. Sanson attempted to discuss the divorce,
Mr. Teshima redirected the conversation to business matters. This Court is not surprised by
this redirection by Mr. Teshima and emphasizes that at no time has Mr. Teshima *ever* discussed
this matter with the Court. This Court has never felt any pressure or attempts to influence the
path of this case from Mr. Teshima.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

This Court recognizes the judicial duty to sit. Mr. Sanson's Sworn Declaration filed on August 22, 2017, however, creates a conflict for the Court. Moreover, it has become evident based on the history of this matter that any decision by this Court that favors Defendant in any manner is perceived by Plaintiff as being influenced by something that has happened outside of this courtroom. Similarly, Defendant may have the perception that, because this Court has declared its disgust and disdain for outside efforts to influence this matter, the Court is somehow overcompensating to counter Plaintiff's perception. These perceptions (although untrue on both accounts) are unfair to both parties. Accordingly, it is appropriate that this Court recuse from this matter.

Finally, because there have been outside attempts to influence this Court in this matter, complete transparency is warranted to maintain public confidence in the administration of justice. Notably, Mr. Sanson (through counsel) argued that this matter was improperly sealed. To clarify this Court's findings at the August 30, 2017 hearing, this Court concurs that the hearings in this matter and orders entered by the Court should not be sealed and should be available for public inspection. However, this Court recognizes that filings of the parties and experts contain sensitive information related to both custody issues and financial issues. Consistent with NRS 125.110, those papers should remain sealed.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Based on the foregoing, and good cause appearing therefor,

It is hereby ORDERED that this Court RECUSE from this case. It is further ORDERED that, to the extent possible, this matter be referred to the Senior Judge Program for further proceedings.

It is further ORDERED that the hearings pending before this Court, including trial dates and hearings related to discovery issues, should be re-calendared upon the reassignment of this matter.

It is further ORDERED that the hearing videos and orders entered by this Court should be unsealed.

DATED this 5th day of September, 2017.

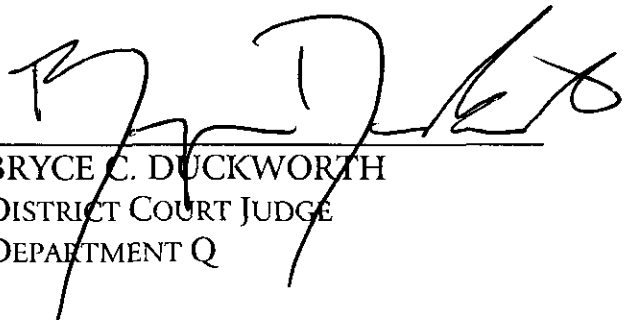

BRYCE C. DUCKWORTH
DISTRICT COURT JUDGE
DEPARTMENT Q

EXHIBIT 7

EXHIBIT 7

Julie Schoen

Subject: FW: Saiter v. Saiter

From: Louis Schneider [<mailto:lcslawllc@yahoo.com>]
Sent: Thursday, September 15, 2016 8:57 AM
To: Brandon Leavitt
Cc: Stephanie Stolz
Subject: Re: Saiter v. Saiter

I've had about all I can take.
Withdraw your Motion and I'll withdraw from the case.
Be advised - Tina has asked me not to leave the case.
I was getting ready to withdraw my motion to withdraw.
If your firm does not withdraw that motion, I will oppose it and take additional action beyond the opposition.

Law Office of Louis C. Schneider

Nevada Bar No. 9683
430 South Seventh Street
Las Vegas, Nevada 89101
Phone: 702-435-2121
Fax: 702-431-3807

CONFIDENTIALITY WARNING: This e-mail and any attachments are for the exclusive and confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute or take action in reliance upon this missive. If you have received this in error, please notify the sender immediately by reply e-mail and delete this message and its attachments from your computer system. We do not waive any attorney-client, work product or other privilege by sending this email or attachment.

From: Brandon Leavitt <BLeavitt@theabramslawfirm.com>
To: Louis Schneider <lcslawllc@yahoo.com>
Cc: Stephanie Stolz <[sstolz@theabramslawfirm.com](mailto:ssstolz@theabramslawfirm.com)>
Sent: Thursday, September 15, 2016 8:50 AM
Subject: Saiter v. Saiter

PERSONAL AND CONFIDENTIAL

The information contained in this e-mail is from The Abrams & Mayo Law Firm which may be confidential and may also be attorney-client privileged. The information is intended for the use of the individual or entity to whom it is addressed and others who have been specifically authorized to receive it. If you are not the intended recipient, you are hereby instructed to return this e-mail unread and delete it from your inbox and recycle bin. You are hereby notified that any disclosure, dissemination, distribution, use or copying of the contents of this information is strictly prohibited.

Lou,

I was CC'd on an email from your client to you requesting you to give me permission to speak with her directly. 1) Do I have your permission to do so?; and 2) Will you allow the department to Zoom your Order to Withdraw so I can attempt to button this matter up?

I'm hamstrung until you allow me to work with her directly or withdraw so I can. Please advise. Thanks.

Sincerely,
Brandon K. Leavitt, Esq.
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Suite 100
Las Vegas, Nevada 89118
Tel: (702) 222-4021
Fax: (702) 248-9750
www.TheAbramsLawFirm.com

[Spam](#)
[Phish/Fraud](#)
[Not spam](#)
[Forget previous vote](#)

EXHIBIT 8

EXHIBIT 8

From: Tina Saiter <cleaningmama30@aol.com>
Date: October 6, 2016 at 12:20:12 PM PDT
To: Brandon Saiter <bsaiter@harmonicinnerprizes.com>
Subject: Fwd: You tube video

Tina Saiter

Begin forwarded message:

From: Louis Schneider <lcslawllc@yahoo.com>
Date: October 6, 2016 at 12:09:06 PM PDT
To: Tina Saiter <cleaningmama30@aol.com>
Subject: Re: You tube video
Reply-To: Louis Schneider <lcslawllc@yahoo.com>

There is apparently some sort of war between Veterans In Politics and the other side.

We're stipulating to seal the case. That means nobody will be able to look it up.

I'm trying to seal the case.

I've got calls all over trying to find out.

I'm not happy about it either.

Law Office of Louis C. Schneider

Nevada Bar No. 9683

430 South Seventh Street
Las Vegas, Nevada 89101
Phone: 702-435-2121
Fax: 702-431-3807

CONFIDENTIALITY WARNING: This e-mail and any attachments are for the exclusive and confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute or take action in reliance upon this missive. If you have received this in error, please notify the sender immediately by reply e-mail and delete this message and its attachments from your computer system. We do not waive any attorney-client, work product or other privilege by sending this email or attachment.

From: Tina Saiter <cleaningmama30@aol.com>
To: Louis Schneider <lcsllawllc@yahoo.com>; lcsllaw@yahoo.com
Sent: Thursday, October 6, 2016 11:29 AM
Subject: You tube video

Louis

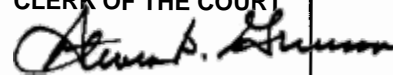
Why is there a You Tube Video of our divorce case??

Tina Saiter

Spam
Phish/Fraud
Not spam
Forget previous vote

41

41



1 JOSEPH W. HOUSTON, II, ESQ.
2 State Bar #1440
3 430 South 7th Street
4 Las Vegas, Nevada 89101
5 (702) 982-1200
6 Attorney for Defendant
7 LOUIS C. SCHNEIDER, individually
8 and LAW OFFICE OF LOUIS C. SCHNEIDER, LLC.

6 **DISTRICT COURT**
7 **CLARK COUNTY, NEVADA**

9 JENNIFER V. ABRAMS and the
10 ABRAMS & MAYO LAW FIRM,

11 Plaintiffs,

12 vs.

13 LOUIS C. SCHNEIDER; LAW
14 OFFICES OF LOUIS C. SCHNEIDER,
15 LLC; STEVE W. SANSON; HEIDI J.
16 HANUSA; CHRISTINA ORTIZ;
17 JOHNNY SPICER; DON
18 WOOLBRIGHT; VETERAN'S IN
19 POLITICS INTERNATIONAL, INC;
20 SANSON CORPORATION; KAREN
21 STEELMON; and DOES I through X,

22 Defendant.

CASE NO. A-17-749318-C
DEPT. NO. XII

Date of Hearing: 2/12/2018
Time of Hearing: 8:30 AM

Oral Argument Is Requested

23 **REPLY TO PLAINTIFF'S OPPOSITION TO AN AWARD OF**
24 **ATTORNEY'S FEES, COSTS AND STATUTORY SANCTIONS**

25 COMES NOW, the Defendant, LOUIS C. SCHNEIDER, individually,
26 and the LAW OFFICES OF LOUIS C. SCHNEIDER, LLC, by and through
27 their attorney, Joseph W. Houston, II, Esq., to file this Reply to the Plaintiffs'
28 Opposition to the Defendants' Motions for Attorney's Fees, Costs and
Sanctions.

POINTS AND AUTHORITIES

The Court has granted a Motion to Dismiss the Plaintiffs' Complaint
against the Defendant, LOUIS C. SCHNEIDER, individually, and a separate
Defendant, LAW OFFICES OF LOUIS C. SCHNEIDER, LLC. Pursuant to

JVA001260

1 NRS 41.670 (1)(a) it is mandatory that "The Court shall award reasonable costs
2 and attorney's fees to the person against whom the action was brought..."

3 Further, pursuant to NRS 41.670 (1)(b), "The Court may award an
4 amount up to \$10,000 to the person whom the action was brought." Thus, the
5 Court may award both Louis C. Schneider, individually, as well as the
6 Defendant, Law Offices of Louis C. Schneider, LLC \$10,000 each as sanctions
7 against the Plaintiffs for filing this lawsuit.

8 The affidavit of the Defendants' attorneys, Cal Potter, III., and Cal Potter,
9 IV., has been filed herein. Pursuant to that affidavit and in paragraph 8 there are
10 attorney's fees in the amount of \$80,455 and costs in the amount of \$19.00, for
11 a total of \$80,474.

12 The Plaintiffs filed a Complaint against the Defendants, LOUIS C.
13 SCHNEIDER and LAW OFFICES OF LOUIS C. SCHNEIDER, LLC., which
14 the Court has already ruled that they failed to meet their burden as they could
15 not show a probability of success on their claim, and thus, the Court dismissed
16 their Complaint. The Plaintiffs' actions in filing this Complaint forced both
17 Defendants, LOUIS C. SCHNEIDER and LAW OFFICE OF LOUIS C.
18 SCHNEIDER, LLC., to retain Counsel to defend this action. The Defendants'
19 Counsel has filed an affidavit under oath that the attorney's fees that were
20 actually and necessarily incurred, were reasonable. The Plaintiffs' response is
21 that the Defendants' request for fees which the Defendants incurred and are
22 mandatory pursuant to NRS 41.670(1)(a) are "an attempted bank robbery"
23 (Opposition, page 3-line 1). Defendant's response is inappropriate and
24 disgusting.

25 These are fees that the Plaintiffs' legally insufficient Complaint caused.
26 None of these fees which the Defendants incurred, would have been required if
27 the Plaintiff would have not filed their legally invalid Complaint. It is
28 hypocritical of the Plaintiffs to in essence say they filed a legally invalid
Complaint, the Court dismissed their legally invalid Complaint pursuant to

1 Nevada Statutes, that Nevada Statutes mandate an award of attorney's fees, but
2 even though the Defendants were forced to expend unnecessarily attorney's fees
3 in the amount of \$80,455 and costs in the amount of \$19.00 to defend
4 themselves against this legally invalid action, the Defendants should only be
5 awarded "\$6,727.50" and thus should be required to pay \$73,746.50 from their
6 own pockets. (See Opposition page 2-line 7)

7 Thus, the Court should award as mandated by NRS 41.670(1)(a) \$80,455
8 for attorney's fees and \$19.00 for costs to the Schneider Defendants.

9
10 **AS TO THE ISSUE OF SANCTIONS**

11 NRS 41.670(1)(b) sets forth that the Court "may" award as discretionary
12 with the Court, sanctions as to each Defendant, being LOUIS C. SCHNEIDER,
13 personally and LAW OFFICES OF LOUIS C. SCHNEIDER, LLC., the sum of
14 \$10,000 each.

15 The Plaintiff's Opposition states, "...because the Abrams parties' claims
16 were neither frivolous nor vexatious, none of the Defendants are entitled to
17 statutory sanctions in the amount of \$10,000." (Opposition page 2-line 8) There
18 is absolutely nothing in the statute or in Nevada Case Law requiring the Court
19 to make these findings in order to award sanctions. The Plaintiffs actually admit
20 this in their Opposition at page 20, line 20 when they state, "NRS 41.670(1)(b)
21 is silent in terms of the standard for obtaining sanctions."

22 Yet, a few lines later on page 21 beginning at line 2, the Plaintiffs states,
23 "...NRS 41.670(2)-(3) requir(es) a Plaintiff who successfully opposes an anti-
24 slapp motion to show that the motion was "frivolous or vexatious" prior to
25 receiving an award of attorney's fees, costs and sanctions."

26 It is truly unbelievable that the Plaintiffs would make these statements
27 which are totally false misrepresentations of NRS 41.760. Subsection (1)(a)
28 mandates by using the word "shall" an award of attorney's fees and costs. There
is nothing whatsoever contained in the statute as the Plaintiffs allege requiring

1 the Court to find that the Complaint was “frivolous and vexatious” before an
2 award of attorney’s fees and costs. This is a total intentional misrepresentation
3 to the Court.

4 Likewise, subsection (1)(b) allows the Court in its discretion to award
5 sanctions, but the statute again does not make any requirement that the Court
6 find that the Complaint was filed on the basis of being “frivolous or vexatious”.
7 Instead, the Court may simply determine based upon the facts of each individual
8 case, whether or not to award sanctions based upon its discretion.

9 Despite there being no legal requirement for the Court having to find that
10 Complaint was “frivolous or vexatious” to award attorney’s fees, costs and
11 sanctions, it is totally outrageous for the Plaintiffs to state in their Opposition
12 that, “He (Mr. Schneider) enlisted Mr. Sanson to target Ms. Abrams” when
13 there is no evidence whatsoever of this allegation. (Opposition page 22-line 10)

14 It is further totally outrageous for the Plaintiffs to state in their
15 Opposition that “...Mr. Schneider directed Mr. Sanson to publically vilify Ms.
16 Abrams” when there is no evidence whatsoever of this allegation. (Opposition
17 page 22-line 12)

18 It is further totally outrageous for the Plaintiffs to state “...whether or not
19 Mr. Sanson defamed Ms. Abrams (he did repeatedly and unabashedly)...” Thus
20 continuing to allege defamation (Opposition Page 22-line 11) after the Court
21 had already dismissed the Plaintiffs’ Complaint finding that the Plaintiffs
22 cannot show a probability of success on their claims.

23 ...

26 ...

28 ...

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Joseph W. Houston, II, Esq. and that on the 24 day of January, 2018 I served a true and correct copy of the above and forgoing Reply to Plaintiffs' Opposition to Defendants' Motion for Attorney's Fees, Costs and Sanctions on the parties addressed as shown below:

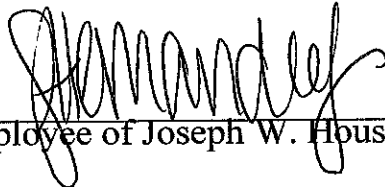
Dennis L. Kennedy, Esq. (Nevada Bar No. 1462)
Joshua P. Gilmore, Esq. (Nevada Bar No. 11576)
BAILEY KENNEDY
8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148

Jennifer V. Abrams, Esq. (Nevada Bar No. 7575)
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Ste. 100
Las Vegas, Nevada 89118

Marshal S. Willick, Esq. (Nevada Bar No. 2515)
WILLICK LAW GROUP
3591 E. Bonanza Road
Las Vegas, Nevada 89110

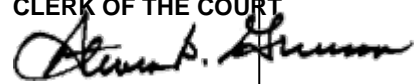
Margaret A. Mcletchie, Esq. (Nevada Bar No. 10931)
MCLETCHIE SHELL LLC
701 East Bridger Ave., Suite 520
Las Vegas, Nevada 89101

- Via Electronic Service [NEFR Rule 9]
- Via facsimile [EDCR 7.26(a)]
- Via U.S. Mail (NRCP 5(b))


An Employee of Joseph W. Houston, II,
Esq.

42

42



1 **MDQJ**

JENNIFER V. ABRAMS, ESQ.
Nevada State Bar Number: 7575
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Boulevard, Suite 100
Las Vegas, Nevada 89118
Phone: (702) 222-4021
Email: JVAGroup@theabramslawfirm.com
Attorney for Plaintiffs

6
7 **EIGHTH JUDICIAL DISTRICT COURT**
CLARK COUNTY, NEVADA

8 MARSHAL S. WILLICK and WILLICK LAW) Case No.: A-17-750171-C
GROUP,)
9) Department: XVIII
Plaintiffs,)
10)
vs.)
11)
STEVE W. SANSON and VETERANS IN)
12 POLITICS INTERNATIONAL, INC.,)
13 Defendants.)

14 JENNIFER V. ABRAMS and THE ABRAMS) Case No.: A-17-749318-C
& MAYO LAW FIRM,)
15) Department: XII
16 Plaintiffs,)
17 vs.)
18 LOUIS C. SCHNEIDER; LAW OFFICES OF)
LOUIS C. SCHNEIDER, LLC; STEVE W.)
19 SANSON; and VETERANS IN POLITICS)
INTERNATIONAL, INC.,)
20 Defendants.)
21)

22 **MOTION TO DISQUALIFY EIGHTH JUDICIAL DISTRICT COURT**
23 **ELECTED JUDICIARY, AND FOR PERMANENT ASSIGNMENT TO THE**
24 **SENIOR JUDGE PROGRAM OR, ALTERNATIVELY, TO A DISTRICT**
COURT JUDGE OUTSIDE OF CLARK COUNTY

NOTICE OF MOTION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

- TO: HON. KENNETH C. CORY, Eighth Judicial District Court Judge, Department 1;
- TO: HON. RICHARD SCOTTI, Eighth Judicial District Court Judge, Department 2;
- TO: HON. DOUGLAS W. HERNDON, Eighth Judicial District Court Judge, Department 3;
- TO: HON. KERRY EARLEY, Eighth Judicial District Court Judge, Department 4;
- TO: HON. CAROLYN ELLSWORTH, Eighth Judicial District Court Judge, Department 5;
- TO: HON. ELISSA F. CADISH, Eighth Judicial District Court Judge, Department 6;
- TO: HON. LINDA MARIE BELL, Eighth Judicial District Court Judge, Department 7;
- TO: HON. DOUGLAS E. SMITH, Eighth Judicial District Court Judge, Department 8;
- TO: HON. JENNIFER P. TOGLIATTI, Eighth Judicial District Court Judge, Department 9;
- TO: HON. TIERRA D. JONES, Eighth Judicial District Court Judge, Department 10;
- TO: HON. ELIZABETH GONZALEZ, Eighth Judicial District Court Judge, Chief Judge, Department 11;
- TO: HON. MICHELLE LEAVITT, Eighth Judicial District Court Judge, Department 12;
- TO: HON. MARK R. DENTON, Eighth Judicial District Court Judge, Department 13;
- TO: HON. ADRIANA ESCOBAR, Eighth Judicial District Court Judge, Department 14;
- TO: HON. JOE HARDY, Eighth Judicial District Court Judge, Department 15;
- TO: HON. TIMOTHY C. WILLIAMS, Eighth Judicial District Court Judge, Department 16;

- 1 TO: HON. MICHAEL P. VILLANI, Eighth Judicial District Court Judge,
Department 17;
- 2 TO: HON. MARK B. BAILUS, Eighth Judicial District Court Judge, Department
3 18;
- 4 TO: HON. WILLIAM KEPHART, Eighth Judicial District Court Judge,
Department 19;
- 5 TO: HON. ERIC JOHNSON, Eighth Judicial District Court Judge, Department 20;
- 6 TO: HON. VALERIE ADAIR, Eighth Judicial District Court Judge, Department 21;
- 7 TO: HON. SUSAN H. JOHNSON, Eighth Judicial District Court Judge,
8 Department 22;
- 9 TO: HON. STEFANY MILEY, Eighth Judicial District Court Judge, Department
23;
- 10 TO: HON. JIM CROCKETT, Eighth Judicial District Court Judge, Department 24;
- 11 TO: HON. KATHLEEN E. DELANEY, Eighth Judicial District Court Judge,
12 Department 25;
- 13 TO: HON. GLORIA J. STURMAN, Eighth Judicial District Court Judge,
Department 26;
- 14 TO: HON. NANCY ALLF, Eighth Judicial District Court Judge, Department 27;
- 15 TO: HON. RONALD J. ISRAEL, Eighth Judicial District Court Judge, Department
16 28;
- 17 TO: HON. DAVID JONES, Eighth Judicial District Court Judge, Department 29;
- 18 TO: HON. JERRY A. WIESE, II, Eighth Judicial District Court Judge, Department
30;
- 19 TO: HON. JOANNA S. KISHNER, Eighth Judicial District Court Judge,
20 Department 31;
- 21 TO: HON. ROB BARE, Eighth Judicial District Court Judge, Department 32;
- 22 TO: HON. WILLIAM O. VOY, Eighth Judicial District Court Judge, Family
Division, Department A;
- 23 TO: HON. LINDA MARQUIS, Eighth Judicial District Court Judge, Family
24 Division, Department B;

- 1 TO: HON. REBECCA L. BURTON, Eighth Judicial District Court Judge, Family
Division, Department C;
- 2
- 3 TO: HON. ROBERT W. TEUTON, Eighth Judicial District Court Judge, Family
Division, Department D;
- 4 TO: HON. CHARLES HOSKIN, Eighth Judicial District Court Judge, Family
Division, Department E;
- 5
- 6 TO: HON. DENISE L. GENTILE, Eighth Judicial District Court Judge, Family
Division, Department F;
- 7 TO: HON. CYNTHIA DIANE STEEL, Eighth Judicial District Court Judge, Family
Division, Department G;
- 8
- 9 TO: HON. T. ARTHUR RITCHIE, JR., Eighth Judicial District Court Judge,
Family Division, Department H;
- 10 TO: HON. CHERYL B. MOSS, Eighth Judicial District Court Judge, Family
Division, Department I;
- 11
- 12 TO: HON. RENA G. HUGHES, Eighth Judicial District Court Judge, Family
Division, Department J;
- 13 TO: HON. CYNTHIA N. GIULIANI, Eighth Judicial District Court Judge, Family
Division, Department K;
- 14
- 15 TO: HON. JENNIFER L. ELLIOTT, Eighth Judicial District Court Judge, Family
Division, Department L;
- 16 TO: HON. WILLIAM S. POTTER, Eighth Judicial District Court Judge, Family
Division, Department M;
- 17
- 18 TO: HON. MATTHEW HARTER, Eighth Judicial District Court Judge, Family
Division, Department N;
- 19 TO: HON. FRANK P. SULLIVAN, Eighth Judicial District Court Judge, Family
Division, Department O;
- 20
- 21 TO: HON. SANDRA L. POMRENZE, Eighth Judicial District Court Judge, Family
Division, Department P;
- 22 TO: HON. BRYCE C. DUCKWORTH, Eighth Judicial District Court Judge, Family
Division, Presiding Judge, Department Q;
- 23
- 24 TO: HON. BILL HENDERSON, Eighth Judicial District Court Judge, Family
Division, Department R;

- 1 TO: HON. VINCENT OCHOA, Eighth Judicial District Court Judge, Family
2 Division, Department S;
- 3 TO: HON. LISA M. BROWN, Eighth Judicial District Court Judge, Family
4 Division, Department T;
- 5 TO: Eighth Judicial District Court, Senior Judge Department;
- 6 TO: STEVE W. SANSON and VETERANS IN POLITICS INTERNATIONAL, INC.,
7 Defendants in case numbers A-17-750171-C and A-17-749318-C;
- 8 TO: LOUIS C. SCHNEIDER and LAW OFFICES OF LOUIS C. SCHNEIDER, LLC,
9 Defendants in case number A-17-749318-C;
- 10 TO: MARGARET A. McLETCHIE, ESQ., Attorney for Defendants, STEVE W.
11 SANSON and VETERANS IN POLITICS INTERNATIONAL, INC., in case
12 number A-17-749318-C;
- 13 TO: ANAT LEVY, ESQ., Attorney for Defendants, STEVE W. SANSON and
14 VETERANS IN POLITICS INTERNATIONAL, INC., in case number A-17-
15 750171-C;
- 16 TO: JOSEPH W. HOUSTON, II, ESQ., Attorney for Defendants, LOUIS C.
17 SCHNEIDER and LAW OFFICES OF LOUIS C. SCHNEIDER, LLC, in case
18 number A-17-749318-C;

19 PLEASE TAKE NOTICE that the foregoing Motion will be heard on
20 **3-2-18** at _____, in **CHAMBERS**

21 of the above-entitled Court.

22 DATED Wednesday, January 24, 2018.

23 Respectfully submitted:
24 THE ABRAMS & MAYO LAW FIRM

/s/ Jennifer V. Abrams, Esq.
Jennifer V. Abrams, Esq.
Nevada State Bar Number: 7575
6252 South Rainbow Boulevard, Suite 100
Las Vegas, Nevada 89118
Phone: (702) 222-4021
Attorney for Plaintiffs

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 This *Motion* does not come lightly. The idea that the entire elected judiciary in
4 Clark County could be tainted by one person seems extreme; however, the reality is
5 that implied bias and the appearance of impropriety has already left its mark in these
6 and related matters.

7 Steve Sanson, through his faux “non-profit” group, Veterans in Politics
8 International (“VIPI”), has been the driving force behind a systematic, organized
9 effort to intimidate judges and candidates, build a personal rapport with them,
10 become their go-to for a “veteran’s endorsement” during election cycles, and become
11 their worst nightmare if they dare get in his way. Over 90% of the judges on the
12 civil/criminal bench have accepted an endorsement from VIPI, appeared on a VIPI
13 radio show, appeared at a VIPI “sponsored” event in an official capacity or as a
14 candidate, paid campaign money to VIPI for advertising, and/or have been the target
15 of VIPI’s wrath.

16 Steve Sanson has “declared war” on an entire 20-judge division of this judicial
17 district. He launched smear campaigns against several judges. He has contacted
18 judges at home, on their personal cell phones, or by other means in order to question
19 their decisions to take a personal day off or to clear their court calendars. He has
20 been seen in the “back hallway” conversing with judges privately and has commented
21 publicly about conversations that occurred at private judges’ meetings. He
22 purposefully injected himself into at least one specific divorce case by contacting the
23 judge on his personal cell phone in an effort to sway the judge’s decisions on behalf
24 of one of the litigants. And, he “monitors” judges on a near-daily basis, reporting his

1 opinions of judges and their qualifications for retention on the bench on his
2 numerous social media outlets and via email blasts as a mechanism for intimidation.
3 It has been reported that his email blasts are sent to some 60,000 to 80,000
4 recipients and his social medial sites likewise reach tens of thousands of people.

5 Mr. Sanson feels so entitled to “control” the elected judiciary that he invited
6 the judge assigned to his own pending case to appear on his radio show. During the
7 radio show interview with Judge Bailus (who subsequently recused from the *Willick*
8 *v. Sanson* matter), Mr. Sanson questioned the political viability of Judge Bailus’
9 future as a district court judge in future election cycles; the implication was obvious.

10 Mr. Sanson has publicly announced his intentions to try to regulate which
11 candidates are elected / re-elected to the district court bench in the future. He has
12 posted “lists” of judges that he is targeting in the 2020 election cycle—threatening to
13 do the “dirty work” required to get a judiciary that plays by his rules. In an August 2,
14 2016 post on his Facebook Page “War declared on Clark County Nevada Family
15 Court System,” he said:¹

16 I want to make myself Crystal Clear (sic) any attorney who is planning to fill
17 a vacancy or become a candidate for Clark County Family Court Judge and
you are corrupt, unethical or an asshole to litigants. (sic)

18 Don’t waste your time, we are not clearing out bullshit just to fill it with
19 yours!

20 Steve Sanson
21 President of Veterans In Politics International

22 Regardless of what elected judges might **privately** think about Steve Sanson
23 and his sham organization, no one wants to be targeted by one of Mr. Sanson’s well-
24 established “smear campaigns.”

¹ See Facebook post, dated August 2, 2017, attached hereto as **Exhibit 1**.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

Mr. Sanson further boasts, in an August 18, 2016 post:²

We are starting to vet attorneys that are interested in the Clark County District Court Family Division Judgeship.

If you are interested in becoming a judge within the Family Division and you will have 10 years practicing law within the state of Nevada by January 2020, please contact Steve Sanson at 702 283 8088.

The time to start name recognition is NOW!

While these posts are targeted towards Family Court, Mr. Sanson does the same with nearly every elected official in Clark County, Nevada. And judges who do not kowtow to Mr. Sanson become subjected to his wrath. He solicits “dirt” on these judges from disgruntled litigants.³ He “observes” their courtrooms and solicits others to join him in doing so.⁴ He publicly criticizes their decisions in the case while reporting skewed and one-sided “facts” to portray the judge in the most negative light possible.⁵ And, he relentlessly posts negative and defamatory material via social media and email blasts against the judicial officer in order to target, harass, intimidate, and terrorize that judicial officer as much as possible, making that elected official’s next campaign dreadful and expensive.

Several judges have privately confessed to the undersigned that they do not wish, to the extent that they can avoid it, to become a “target” of Steve Sanson. Further, every political and judicial candidate knows the power of the “veteran’s vote.” For over a decade, VIPI was the only known group that actively pursued and endorsed candidates “on behalf of” veterans; VIPI has even advertised this under the

² See Facebook post, dated August 18, 2017, attached hereto as **Exhibit 2**.

³ See generally Facebook posts and emails from Mr. Sanson, attached hereto as **Exhibit 3**.

⁴ *Id.*

⁵ *Id.*

1 tag-line of “Judicial Candidates Compete for the Most Valuable Veteran
2 Endorsement in Clark County, Nevada.” Nearly every elected judge in this county—
3 from the municipal court through the appellate courts—has had some contact or
4 relationship with Mr. Sanson and VIPI in some way to gain or maintain their
5 position on the bench.

6 These lawsuits directly challenge the legitimacy of Mr. Sanson and his faux
7 organization, and assert that Mr. Sanson uses VIPI to extort money from politicians,
8 judges, and candidates for his own personal gain and, as relevant in these cases, as
9 the tool of a mercenary who will target anyone if the price is right. Any judge or
10 potential judge who has engaged with Mr. Sanson or VIPI, or who plans to run for
11 re-election, is inherently biased or, at the very least, has the appearance of
12 impropriety, as that judge (or potential judge) is less likely to find that VIPI is a
13 sham organization than if he or she had not engaged or were not seeking re-election
14 and, in turn, the votes and endorsements of this so-called “veteran’s organization.”
15 Further, anyone who voluntarily seeks out or “competes” for the endorsement or
16 support of an organization is necessarily less likely to view his or her own association
17 as illegitimate or the organization’s existence as illegitimate. This is textbook bias,⁶
18 and likely the reason why 14 out of the 32 judges on the civil/criminal bench have
19 already been reassigned from the three cases involving Mr. Sanson filed in the last
20 two years.

21 Based on the facts and arguments herein, it is reasonable to find that nearly
22 the entire judiciary in Clark County has been influenced by Mr. Sanson or VIPI or, at
23 the very least, appears to have been so influenced from a public perception. Any

24 ⁶ *Oxford English Dictionary Online, 2nd edition, December 2017* (defining bias as, *inter alia*,
“prejudice in favor of or against one thing, person, or group compared with another, usually in a way
considered to be unfair”).

1 decision made by an elected judge or a judge seeking re-election in Clark County will
2 certainly come under scrutiny by many. The cases of *Abrams v. Sanson* and *Willick*
3 *v. Sanson* are being watched closely by thousands of people in the community and
4 are the topic of significant discussion on numerous social media sites. Another
5 defamation case recently filed against Sanson, *DiCiero v. Sanson*,⁷ is now also being
6 closely watched and discussed on social media. These cases have been the topic of
7 the Las Vegas Review Journal's interest, most recently in Jane Ann Morrison's
8 article entitled "Judges' ties with Sanson have courts in tight spot" published on
9 January 20, 2018, discussing the appearance of impropriety of having elected judges
10 hear any of the cases involving the "social media and email bomb thrower" who "sees
11 himself as a political power player" even though "[p]lenty of veterans and political
12 figures see him as a poser."⁸ She concludes that the bouncing of these cases from one
13 elected judge to another due to the appearance of impropriety is an "embarrassment
14 for the judiciary."

15 These cases really need to either be permanently assigned to a senior judge, a
16 judge who sits outside Clark County, or these matters should be transferred to a
17 different judicial district court entirely.

18 **II. FACTUAL BACKGROUND**

19 **A. Mr. Sanson's History of Attempting to Influence the Judiciary**

20 1. Judge Duckworth in *Ansell v. Ansell*.

21 Mr. Sanson has a history of attempting to corrupt sitting judges in pending
22 cases. In the *Order of Recusal* entered by the Honorable Bryce Duckworth in *Irina*

23 ⁷ *Mark DiCiero v. Steve Sanson, et. al.*, Eighth Judicial District Court case number D-18-
24 767961-C

⁸ Morrison, Jane Ann. "Judges' ties with Sanson have courts in tight spot." Las Vegas Review-
Journal, 20 January 2018. See copy attached hereto as **Exhibit 4**.

1 *Ansell v. Douglas Ansell*, filed on September 5, 2017, in case number D-15-521960-
2 D, Judge Duckworth made the following findings about Mr. Sanson and VIPI's *ex*
3 *parte* communications with him (emphasis in the original):⁹

4 [N]otwithstanding his self-proclaimed faux cover of seeking to “expose
5 injustice and corruption,” Mr. Sanson’s sole motivation for
6 communicating with this Court was to intimidate and harass the Court.
7 Mr. Sanson proudly proclaims that he has “declared war” on the Family
8 Court. There is no doubt that the courts are under attack and that the
9 entire judiciary of this great State of Nevada is on notice that, behind
10 that false banner of “justice and corruption” is an individual and group
11 who seek to manipulate, intimidate and control. The arsenal of
12 weapons that Mr. Sanson utilizes include attempts to manipulate,
13 intimidate and control the judicial process through off-the-record
14 communications. This case has exposed the reality of his tactics.

15 * * *

16 What should be frightening to this Court (and members of the Nevada
17 judiciary in general) is that Mr. Sanson refused to acknowledge at the
18 August 30, 2017 hearing that his communication with the Court about
19 a pending case was inappropriate. Specifically, Mr. Sanson, through his
20 counsel, suggested it was the Court’s fault based on the earlier
21 conversation cited above. This Court reiterates that it is inappropriate
22 to communicate with a judicial officer off the record about a pending
23 case – **at any time and under any circumstances**. Mr. Sanson’s
24 attempts to deflect blame to the Court are appalling.

* * *

Is there anything more corrupt than the influence Mr. Sanson sought
to exert over the Court? And he proclaims that he seeks to expose
corruption? Because this Court called him out on the inappropriateness
of his communication and refused to kowtow and cower to his
manipulation and control, Mr. Sanson predictably let the Court know
that his wrath was coming out against the Court. This type of threat to
any judicial officer strikes at the very core of the integrity of the judicial
process. Moreover, such threatening behavior is an attempt to
manipulate and control judicial officers if they do not succumb to Mr.
Sanson’s desired result.

⁹ See *Order of Recusal* entered by the Honorable Bryce Duckworth in *Irina Ansell v. Douglas Ansell*, filed on September 5, 2017, in case number D-15-521960-D, attached hereto as **Exhibit 5**.

1 When this order and the related hearing started circulating on the internet,
2 Mr. Sanson promptly used VIPI and his “Family Court WAR” movement to launch a
3 smear campaign against Judge Duckworth, accusing him of using the bench to
4 retaliate against VIPI. In a Facebook photo commonly referred to as a “meme,” Mr.
5 Sanson likened Department Q to a dumpster fire.¹⁰

6 As a result of this corrupt behavior, the *Ansell* divorce was permanently
7 assigned to a senior judge.

8 2. Judge Bailus in *Willick v. Sanson*.

9 The complaint in the *Willick v. Sanson* matter was filed on January 2, 2017.
10 After some administrative shuffling between departments (due to multiple recusals
11 by judges who felt that their impartiality might be reasonably questioned due to their
12 prior interactions with Mr. Sanson and VIPI), this matter was assigned to
13 Department 18—which, at the time, was vacant and presided over by rotating senior
14 judges.

15 Shortly after the lawsuit was initiated, Defendants filed a *Special Motion to*
16 *Dismiss Pursuant to NRS 41.650 et. seq.* (“Anti-SLAPP”), which was heard by the
17 Honorable Charles J. Thompson on March 14, 2017. Senior Judge Thompson denied
18 Defendants’ motion, and the Defendants appealed. As of this filing, the appeal is still
19 pending in the Nevada Supreme Court.

20 In August 2017, while the appeal was pending, the Honorable Mark B. Bailus
21 was appointed to the vacant Department 18 seat by Governor Sandoval. Mr. Sanson
22 promptly sought to contact him.

23
24

¹⁰ See Facebook photo posted on a page managed by Mr. Sanson, attached hereto as **Exhibit 6**.

1 On November 18, 2017, Defendants sent out a mass marketing email
2 representing that Judge Bailus was scheduled to appear on the VIPI web radio show
3 on November 25, 2017.¹¹ This email blast was disseminated even though Judge
4 Bailus was presiding over a pending case involving Defendants. Between the mass
5 email and the radio show, undersigned counsel learned through a posting on the
6 Facebook page “Nevada Court Watchers” of an email sent by the administrator of
7 that page, Mark DiCiero, to Judge Bailus advising him of the conflict and
8 recommending that he cancel his scheduled appearance.¹² Judge Bailus did not
9 cancel, however, and appeared on Mr. Sanson’s / VIPI’s radio show on November 25,
10 2017.

11 While the instant matters were not directly discussed on air, there was broad
12 conversation about Judge Bailus’ appointment, his judicial style and thought
13 process, his campaigning and financing, and reference to personal communications
14 between him and Mr. Sanson. During the radio show, the following exchange took
15 place (beginning at 00:31:20 in the video):¹³

16 Steve Sanson: You’re in a unique position right now because you just
17 went through the whole appointment process, and
18 you’re going to run next year to retain your
19 appointment, basically.

20 Judge Bailus: Correct.

21 Steve Sanson: And then, if you’re victorious, then you gotta run two
22 years from now...

23 ¹¹ See printout of email from Mr. Sanson, dated November 18, 2017, attached hereto as **Exhibit 7**.

24 ¹² See printout of email from Mr. Mark DiCiero, attached hereto as **Exhibit 8**.

¹³ <https://www.youtube.com/watch?v=ZE4OGmkWXDg>. In the event this video disappears from the internet after the filing of this motion, the undersigned has downloaded a copy for preservation and will provide it upon request.

1 Judge Bailus: That's an interesting situation.

2 Steve Sanson: With all 52 judges.

3 Judge Bailus: Right, apparently, as you know...

4 Steve Sanson: Are you financially and mentally prepared for all of that?

5 Judge Bailus: I... Well, at this point, you're exactly right. When you get
6 appointed, you have to run in the next general election.
7 And, in that case, it will be in 2018. And then it's my
8 understanding that recently, they changed, where we
9 used to have staggered elections for district court
10 judges, and now...

11 Steve Sanson: You know why they did that, right, judge?

12 Judge Bailus: I don't.

13 Steve Sanson: Pay raise.

14 Judge Bailus: Oh really? Oh, I didn't realize that. I thought...

15 Jim Jonas: Because it was a fight like, "I got elected before you..."

16 Steve Sanson: "Why you getting more money than me?"

17 Judge Bailus: I honestly didn't realize that was the reason. I thought
18 maybe they wanted to put everybody on equal footing in
19 2020.

20 Jim Jonas: Follow the money.

21 Judge Bailus: Well, it's going to be interesting because, again, I have to
22 run in 2018 and basically turn right around and run
23 again in 2020.

24 Steve Sanson: Like you're a congressman.

Judge Bailus: Exactly like I'm a congressman. But I don't mind
because I will tell you that I've gone out and met a lot of
good people in the community since I've gotten the
appointment. Because, as a judge, you're somewhat
isolated within the legal community, but that gives you
the opportunity to go out in to the general community
and meet people. **I mean, obviously, I wouldn't be
on this show if I hadn't got the appointment, and
so...**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

Steve Sanson: You never know. We have attorneys come on here and talk about whatever.

Judge Bailus: **Well, you never asked me and I've been around forever.**

Steve Sanson: Judge, you never ring my phone. You know communication works both ways.

Judge Bailus: Absolutely. Absolutely. But I do appreciate the opportunity. I really do.

At the end of the 24 minute and 58 second interview, Mr. Sanson instructed Judge Bailus to look at the camera and advertise his re-election campaign. Judge Bailus did so.

From the discussions that were broadcast, there were *ex parte* communications between Steve Sanson and Judge Bailus during a time when this case was assigned to Judge Bailus. Also, Steve Sanson offered Judge Bailus something of value—*i.e.*, campaign advertising on air—and Judge Bailus accepted that thing of value by looking into the camera and telling the viewers why they should vote for him.

Because Judge Bailus would preside over the dispute between these parties at some point in the future, on November 29, 2017, Plaintiffs Willick and Willick Law Group filed a motion to disqualify Judge Bailus. Though Judge Bailus denied wrongdoing, he acknowledged in his response to the motion that his recusal would be appropriate in order to avoid the “appearance of impropriety.” Though Mr. Sanson fought to keep Judge Bailus (for obvious reasons), the matter was reassigned.

1 After another round of administrative shuffling, the *Willick v. Sanson* matter
2 is now assigned to Department 27, the Honorable Nancy Allf, who herself has
3 recently recused from a matter where Mr. Sanson was a named party because of her
4 relationship with Mr. Sanson and VIPI.¹⁴ On January 14, 2018, Defendants filed a
5 peremptory challenge against Judge Allf, which will likely lead to another round of
6 recusals and administrative reassignments.

7 3. Pushing for Recusals in his “Family Court WAR.”

8 These are far from isolated instances of misconduct by Mr. Sanson and VIPI—
9 it is part and parcel of a deliberate attempt to corrupt judicial proceedings in
10 numerous cases over an extended period of time. It has become Defendants’ strategy
11 in order to obtain the outcome that they desire.

12 As noted by the Administrator of Nevada Court Watchers, Mr. DiCiero,
13 Defendants have “put[] together quite a history of getting recusals for members of
14 his disgruntled War mob – all while crying foul and corruption at the same time.
15 Hypocrisy at its finest.”¹⁵ The observation goes on to identify multiple instances of
16 attempted judge-tampering by the Defendants, including Judge Duckworth in *Ansell*
17 *v. Ansell*, the Honorable Rena Hughes in *Silva v. Silva*, *Wagner v. Marino*, and
18 *Bourn v. Bourn*, Judge Bailus in *Willick v. Sanson*, and the Honorable Linda
19 Marquis in *McDonald v. McDonald*.

20 Sanson even contacted Justice Michael Cherry, asking him to appear on his
21 radio show while three different appeals involving Mr. Sanson are pending in the

22 _____
23 ¹⁴ *Sanson v. Anderson*, case no. A-16-739151-C. This lawsuit was filed after Mr. Sanson’s failed
24 campaign against then-Assemblyman Paul Anderson in District 13. Though Mr. Sanson lost by a
considerable number of votes, he filed a lawsuit accusing the Clark County Clerk’s office of rigging
voting machines.

¹⁵ DiCiero, Mark. (2017, December 27). Nevada Court Watchers [Facebook group]. Retrieved
from <https://www.facebook.com/groups/433293260115971/permalink/1322318161213472/>

1 Nevada Supreme Court. Following receipt of a letter from the undersigned (copied to
2 Mr. Sanson’s counsel), Justice Cherry sent an email to both counsel advising that he
3 would not appear on Mr. Sanson’s radio show and that he would be seeking guidance
4 from the Nevada Commission on Judicial Discipline.

5 **B. Judicial “Hot Potato” in Sanson Cases**

6 No sitting elected judge should want to touch *any* case having to do with Mr.
7 Sanson or VIPI. The political risk is too great. If he or she rules against Mr. Sanson
8 or VIPI, he or she will inevitably become his target when up for re-election.

9 The following is a cursory table of each of the 32 judges on the civil/criminal
10 bench in the Eighth Judicial District Court, identifying each judge’s connection to
11 Mr. Sanson or VIPI (based on publicly available information) and whether that judge
12 is or has been assigned to one of the three cases involving Mr. Sanson or VIPI (*i.e.*,
13 *Willick v. Sanson*, *Abrams v. Schneider*, and *Sanson v. Anderson*).

14 The right three columns were compiled by searching “[judge’s name] Steve
15 Sanson” and “[judge’s name] Veterans In Politics” in Google and Facebook, and by
16 reviewing the Nevada Secretary of State’s Election Division campaign reporting
17 records. Just that search reveals that numerous judges have paid VIPI for campaign
18 advertising, numerous judges have been endorsed by VIPI, and numerous judges
19 have been on Mr. Sanson’s radio show or participated in one of his events. (The
20 judges that have attended Mr. Sanson’s fundraisers and other events are not
21 included here but also create an “appearance of impropriety.”)

22 ///

23 ///

24 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

Dept.	JUDGE	Abrams	Willick	Anderson	\$ to VIPI	Endorsed	Radio / Event
I	Kenneth C. Cory	Per. Chlg.					x
II	Richard Scotti				\$1,800	x	x
III	Douglas W. Herndon			Recused	\$150	x	x
IV	Kerry Earley		Recused	Recused	\$1,800	x	x
V	Carolyn Ellsworth				\$925	x	x
VI	Elissa F. Cadish		Recused	Recused	\$350	x	x
VII	Linda Marie Bell					x	x
VIII	Douglas E. Smith				\$170	x	x
IX	Jennifer P. Togliatti						
X	Tierra D. Jones						x
XI	Elizabeth Gonzalez						
XII	Michelle Leavitt	<i>Current</i>			\$300	x	x
XIII	Mark R. Denton			Recused			
XIV	Adriana Escobar		Recused	Recused			
XV	Joe Hardy				\$150	x	x
XVI	Timothy C. Williams						x
XVII	Michael P. Villani					x	x
XVIII	Mark B. Bailus		Recused/D				x
XIX	William Kephart		Per. Chlg.		\$1,970	x	x
XX	Eric Johnson			Recused			
XXI	Valerie Adair	Recused	Recused				x
XXII	Susan H. Johnson					x	x
XXIII	Stefany Miley			Recused	\$1,150	x	x
XXIV	Jim Crockett		Recused		\$2,412	x	x
XXV	Kathleen E. Delaney				\$1,000	x	x
XXVI	Gloria J. Sturman					x	x
XXVII	Nancy L. Allf		Per. Chlg.	Recused		x	x
XXVIII	Ronald J. Israel				\$1,000		x
XXIX	David Jones		Recused				
XXX	Jerry A. Wiese II				\$970	x	x
XXXI	Joanna S. Kishner			Recused			
XXXII	Rob Bare				\$1,000	x	x

1 This table does not include the dozens of elected judges outside of the
2 civil/criminal bench who have associated with Mr. Sanson or VIPI. It also does not
3 include more personal details about the complicated relationships that Mr. Sanson
4 has gone to great lengths to create with the foregoing judges—including Mr. Sanson’s
5 prior smear campaign against the Honorable Eric Johnson during the 2016 election
6 cycle where his counsel, Ms. Levy, ran against the then-appointed judge; or the
7 number of times that Mr. Sanson has bragged on social media about his
8 “friendships” and “connections” with many sitting civil/criminal court judges. The
9 undersigned has a collection of photographs from Mr. Sanson’s website depicting
10 him hugging, kissing, shaking hands with, and/or standing arm-in-arm with many of
11 the elected judges in the Eighth Judicial District. Again, with these types of publicly
12 available photographs, having an elected judge hear any case involving Mr. Sanson
13 and/or VIPI greatly reduces the public confidence in the judiciary and gives an
14 appearance of impropriety that is palpable.

15 Given how quickly the connections and influence between Mr. Sanson and
16 elected judges became apparent with a simple internet search, it is reasonable that a
17 more detailed search or open discovery will likely detail more direct connections
18 between Mr. Sanson and the elected judiciary. At a minimum, that belief reasonably
19 exists.

20 Because these matters will cycle through the entire judicial district by way of
21 recusals, peremptory challenges, and repetitive motions to disqualify, this *Motion*
22 seeks to spare the waste of judicial resources and alleviate this judicial district of the
23 implied bias or appearance of impropriety that certainly follows Mr. Sanson and
24 VIPI.

1 **III. LAW AND ARGUMENT**

2 Admittedly, this is a very unusual set of circumstances. The Plaintiffs in these
3 cases are asking this Court to take on a heavy task—*i.e.*, declare that implied bias
4 and/or the appearance of impropriety of presiding over cases involving Mr. Sanson
5 and/or VIPI are named parties warrants the disqualification of an entire judicial
6 district of elected judges.

7 If there was a reasonable alternative, this *Motion* would not be necessary;
8 however, to preserve the integrity of the judiciary and in the interest of fair and
9 impartial justice, these matters must be reassigned to senior judges who do not face
10 re-election, or be transferred to a different judicial district where Defendants’
11 influence has not reached. Inconsistencies have already occurred through opposite
12 outcomes of nearly identical motions filed by Mr. Sanson and VIPI in two cases
13 stemming from the same basic fact pattern (*Abrams v. Sanson* and *Willick v.*
14 *Sanson*) – one having been decided by a senior judge (against Mr. Sanson) and the
15 other having been decided by an elected judge (in favor of Mr. Sanson) who, at a
16 minimum, paid \$300 to VIPI in 2008, was “endorsed” by Defendants, and attended
17 one of Mr. Sanson’s events in 2013.

18 **A. This *Motion* should be decided by the Supreme Court**

19 NRS 1.235(5)(b) states that the “[t]he question of the judge’s disqualification
20 must thereupon be heard and determined by another judge agreed upon by the
21 parties or, if they are unable to agree, by a judge appointed: (1) By the presiding
22 judge of the judicial district in judicial districts having more than one judge, or if the
23 presiding judge of the judicial district is sought to be disqualified, by the judge
24

1 having the greatest number of years of service; or (2) By the Supreme Court in
2 judicial districts having only one judge.”

3 This *Motion* puts the Chief Judge of the Eighth Judicial District Court, the
4 Honorable Elizabeth Gonzalez, in a conflicted position. While this judicial district
5 certainly has more than one judge, the Plaintiffs in these matters request that every
6 judge on the civil/criminal bench—including the Chief Judge—be disqualified due to
7 the nature of Clark County’s elected judiciary and Defendants’ connections and
8 interactions with judges and judicial candidates. Technically, this Court could assign
9 this *Motion* to the most senior judge on the Family Court bench; however, that, too,
10 would cause a similar ethical dilemma, especially considering that both of these
11 matters arose from Mr. Sanson’s attempt to influence the outcome of a pending
12 Family Court case.

13 The safest, most logical, and just solution would be to ask the Supreme Court
14 to address this *Motion*. The intent behind NRS 1.235(5)(b)(2) is to facilitate a
15 decision when there is no judge left in the district to hear a disqualification motion.
16 The same intent should be applied here. Alternatively, the most senior retired judge
17 or justice should be called upon to decide this *Motion*.

18 **B. The Eighth Judicial District Court elected judiciary should be**
19 **disqualified from these matters, and these matters should either**
20 **be permanently assigned to a senior judge or to a judge outside of**
21 **Clark County.**

22 Cannon 1 of the Code of Judicial Conduct provides:

23 *“A judge shall uphold and promote the independence, integrity, and*
24 *impartiality of the judiciary and shall avoid impropriety and the*
appearance of impropriety.”

///

///

1 pursuant to the NCJC must “set forth facts and reasons sufficient to cause a
2 reasonable person to question the judge’s impartiality.”¹⁸

3 A judge shall disqualify himself or herself “in any proceeding in which the
4 judge’s impartiality might reasonably be questioned,” including if the judge “has a
5 personal bias or prejudice concerning a party or a party’s lawyer.”¹⁹ “[W]hether a
6 judge’s impartiality can reasonably be questioned is an objective question[.]”²⁰ In
7 other words, would a reasonable person, knowing all salient facts, “have doubts”
8 about the judge’s impartiality?²¹ ***If it is a close call, the balance tips in favor
9 of recusal.***²²

10 A judge is under “a continuing duty to ask himself what a reasonable person
11 knowing all the relevant facts would think about his impartiality.”²³ This is because
12 the duty to avoid the appearance of impropriety is “self-enforcing.”²⁴ “A judge
13 should disclose on the record information that the judge believes the parties or their
14 appearance of impropriety”)

15 ¹⁸ *Id.*

16 ¹⁹ See NCJC Canon 2, Rule 2.11(A)(1); see also *Rivero v. Rivero*, 125 Nev. 410, 438-39, 216 P.3d
213, 233 (2009) (indicating that there must be a reasonable inference of bias or prejudice stemming
from an extrajudicial source).

17 ²⁰ *City of Las Vegas Downtown Redev. Agency v. Eighth Jud. Dist. Ct.*, 116 Nev. 640, 644, 5
P.3d 1059, 1062 (2000); see also NCJC Canon 1 (noting that a judge must “uphold and promote the
18 independence, integrity, and impartiality of the judiciary and . . . avoid impropriety and the
appearance of impropriety”).

19 ²¹ *Ybarra v. State*, 127 Nev. 47, ___, 247 P.3d 269, 272 (2011); see also NCJC Canon 1, Rule 1.2
cmt. [5] (“The test for appearance of impropriety is whether the conduct would create in reasonable
20 minds a perception that the judge violated [the NCJC] or engaged in other conduct that reflects
adversely on the judge’s honesty, impartiality, temperament, or fitness to serve as a judge.”); see also
Rippo v. State, 113 Nev. 1239, 1249 n.2, 946 P.2d 1017, 1024 n.2 (1997) (stating that the Nevada
21 Supreme Court consults the comments to the NCJC for guidance).

22 ²² *United States v. Holland*, 519 F.3d 909, 912 (9th Cir. 2008) (emphasis added). Because 28
USC § 455 is similar to Rule 2.11 of Canon 2 of the NCJC, the Nevada Supreme Court consults federal
23 case law for guidance in interpreting and applying Rule 2.11. See, e.g., *Towbin Dodge, LLC*, 121 Nev.
at 259-60, 112 P.3d at 1068-69; *Hogan v. Warden*, 112 Nev. 553, 560 n.5, 916 P.2d 805, 809 n.5
(1996).

24 ²³ *United States v. Hines*, 696 F.2d 722, 728 (10th Cir. 1982).

²⁴ *United States v. Sibla*, 624 F.2d 864, 867 (9th Cir. 1980). “Impropriety” includes conduct that
“undermines a judge’s independence, integrity, or impartiality.” NCJC *Terminology*.

1 lawyers might reasonably consider relevant to a possible motion for disqualification,
2 even if the judge believes there is no basis for disqualification.”²⁵

3 Among the three cases to which Mr. Sanson and/or VIPI has been named a
4 party in the past two years, 14 judges (or 43.75% of the civil/criminal bench) have
5 recused or have been otherwise removed. 29 out of the 32 judges (or 90.6%) can
6 easily be traced to having been the recipient of a VIPI endorsement, having used or
7 paid Mr. Sanson during the course of a judicial campaign, and/or having
8 participated in a VIPI event or appeared on Mr. Sanson’s internet radio show. To the
9 public, the collaboration with a “veterans group” could sway votes one way or the
10 other. This is not lost on Mr. Sanson, who for decades has embellished his own
11 record and pushed his faux organization on sitting judges, politicians, and
12 candidates, peddling the “veteran’s endorsement” for his own personal gain.

13 The Nevada Supreme Court has stated that campaign contributions alone do
14 not warrant recusal or disqualification;²⁶ however, there has never been a discussion
15 on how the recipient of campaign *expenditures* and the source of campaign
16 endorsements impacts a judge’s disqualification. Plaintiffs submit that Mr. Sanson
17 and VIPI, as the recipients of campaign expenditures and who actively hand out
18 “veteran endorsements” to judges and candidates, should be more heavily
19 scrutinized. Judges and candidates have sought out the endorsement of Mr. Sanson
20 and VIPI if, for no other reason, to avoid becoming a target of their smear
21 campaigns; they sit on VIPI panels and attend interviews with Mr. Sanson for
22 endorsements; they appear at VIPI events and march with Mr. Sanson in public

23 ²⁵ See NCJC Canon 2, Rule 2.11 cmt. [5]; see also *In re Kensington Int’l Ltd.*, 368 F.3d 289, 313
24 (3d Cir. 2004) (“[I]f there is a burden of disclosure, that burden is to be placed on the judge to
disclose possible grounds for disqualification.”).

²⁶ *Ivey v. Eighth Jud. Dist. Ct. (Ivey)*, 129 Nev. ____, 299 P.3d 354, 359 (2013).

1 parades; they appear on Mr. Sanson's radio show; they pay large sums of money to
2 VIPI for billboard advertising labeled with "Endorsed by Veterans In Politics
3 International"; and they support Mr. Sanson's organization by paying for and
4 attending his fundraisers and "Valentine's Day Ball."

5 As stated above, Mr. Sanson and VIPI have a detailed history of trying to
6 influence and corrupt judges. Their influence and public connection to nearly the
7 entire judiciary is simply too overwhelming to be overlooked; any decision by a judge
8 on a case in which Mr. Sanson and/or VIPI is a party creates the appearance of
9 impropriety from an objective standpoint. In light of this, Plaintiffs respectfully
10 request orders disqualifying the entire Eighth Judicial District Court elected (or
11 appointed and eligible for election) judiciary, and to permanently assign these
12 matters to a senior judge.

13 Alternatively, these cases should be reassigned to a different judicial district.
14 This request is not intended as a motion to change venue under NRS 13.050, but
15 rather, following the mechanism under NRS 1.235(5)(a) and "request that the judge
16 of another district court" preside over any future hearings or trials in these cases.

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

1 **IV. CONCLUSION**

2 Based upon the foregoing, Plaintiffs assert that the entire Eighth Judicial
3 District Court elected judiciary be disqualified from presiding over these matters,
4 and that these matters be permanently reassigned to a senior judge who has no
5 connection to Mr. Sanson or VIPI. Alternatively, these matters should be reassigned
6 to a different judicial district.

7 DATED Wednesday, January 24, 2018.

8 Respectfully submitted:

9 THE ABRAMS & MAYO LAW FIRM

10 /s/ Jennifer V. Abrams, Esq.
11 Jennifer V. Abrams, Esq.
12 Nevada State Bar Number: 7575
13 6252 South Rainbow Boulevard, Suite 100
14 Las Vegas, Nevada 89118
15 Phone: (702) 222-4021
16 Attorney for Plaintiffs
17
18
19
20
21
22
23
24

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

AFFIDAVIT OF MARSHAL S. WILLICK

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, MARSHAL S. WILLICK, being first duly sworn, hereby states:

I make this affidavit, pursuant to NRS 1.235, on behalf of myself and as the principal/owner of Willick Law Group, the other named Plaintiff in case number A-17-750171-C.

I declare that I am competent to testify to the facts contained herein.

I have read the preceding filing and hereby certify that the facts set forth in the Points and Authorities attached thereto are true of my own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, I believe them to be true. The factual averments contained in the preceding filing are incorporated herein as if set forth in full.

DATED this 23rd day of January, 2018.



MARSHAL S. WILLICK

SUBSCRIBED AND SWORN to before me on this 23rd day of January, 2018, by Marshal S. Willick.


NOTARY PUBLIC



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

AFFIDAVIT OF JENNFIER V. ABRAMS

STATE OF NEVADA)
)
COUNTY OF CLARK) ss:

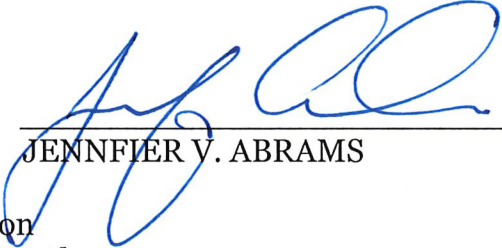
I, JENNFIER V. ABRAMS, being first duly sworn, hereby states:

I make this affidavit, pursuant to NRS 1.235, on behalf of myself and as the principal/owner of The Abrams & Mayo Law Firm, the other named Plaintiff in case number A-17-749318-C.

I declare that I am competent to testify to the facts contained herein.

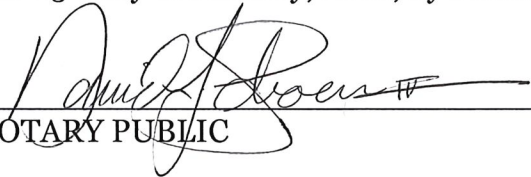
I have read the preceding filing and hereby certify that the facts set forth in the Points and Authorities attached thereto are true of my own knowledge, except for those matters therein contained stated upon information and belief, and as to those matters, I believe them to be true. The factual averments contained in the preceding filing are incorporated herein as if set forth in full.

DATED this 23rd day of January, 2018.

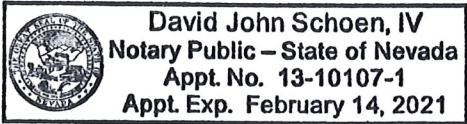


JENNFIER V. ABRAMS

SUBSCRIBED AND SWORN to before me on this 23rd day of January, 2018, by Jennifer V. Abrams.



NOTARY PUBLIC



The attorney general's office said that per office policy, it could neither confirm nor deny whether there is an investigation. The district attorney's office said officials there tried to contact DiCiero twice and received no calls back.

The real battle will be in civil court, once a judge can be found to take the defamation case. But Sanson may find that his attempts to warm up to local judges have backfired if all judges recuse themselves.

What an embarrassment for the judiciary.

Here's the kicker. On Thursday, DiCiero filed his own defamation lawsuit against Sanson and several others, citing comments posted on social media.

Who will take that case?

Jane Ann Morrison's column runs Sundays in the Nevada section. Contact her at jane@reviewjournal.com or 702-383-0275. Follow @janeannmorrison (<http://www.twitter.com/janeannmorrison>) on Twitter.

ADVERTISING



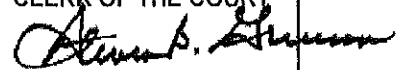
TOP NEWS

JVA001343

EXHIBIT 5

EXHIBIT 5

EXHIBIT 5



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDR

DISTRICT COURT
CLARK COUNTY, NEVADA

IRINA ANSELL,)
)
Plaintiff,)
)
v.)
)
DOUGLAS ANSELL,)
)
Defendant.)

CASE NO. D-15-521960-D
DEPT NO. Q

Date of Hearing: August 30, 2017
Time of Hearing: 2:00 p.m.

ORDER OF RECUSAL

This matter came on for a hearing before this Court on August 30, 2017. The matters before the Court included:

- (1) Non-Party, Veterans In Politics International, Inc. and Steve Sanson's Motion to Quash Subpoena Served on Verizon Wireless (Jul.26, 2017);
- (2) Non-Parties Steve Sanson, Veterans In Politics International, Inc., and Sanson Corporation's Motion to Quash Subpoena Duces Tecum and Deposition Subpoena Served on Steve Sanson on July 22, 2017 (Aug. 4, 2017); and
- (3) This Court's Amended Notice of Rescheduling of Hearing and Setting Calendar Call (Aug. 28, 2017).

Associated motions and papers were considered and reviewed by the Court, including requests for attorney's fees and Plaintiff's Motion to Compel (Aug. 10, 2017). The discovery issues previously were assigned to be heard by the Discovery Commissioner on August 20, 2017. The Discovery Commissioner, however, recused

BRYCE C. DUCKWORTH
DISTRICT JUDGE

FAMILY DIVISION, DEPT. Q
LAS VEGAS, NEVADA 89101

1
2 and the matter was placed on this Court's calendar on the above-referenced date.
3 Plaintiff did not appear personally, but was represented by her attorney, Marshal
4 Willick, Esq. Defendant did not appear personally, but was represented by his
5 attorney, John Jones, Esq. Steve Sanson appeared personally and with his attorney,
6 Anat Levy, Esq.
7

8 As previously noted, this Court reviewed a multitude of papers filed by and on
9 behalf of Plaintiff and Mr. Sanson or Veterans In Politics International (hereinafter
10 referred to individually and collectively as "Mr. Sanson") in preparation for the hearing.
11 This Court's preparation included review of the Omnibus Supplemental Declaration
12 of Steve Sanson in Support of: Motions to Quash Subpoenas Duces Tecum Served on
13 Verizon Wireless and Steve Sanson and Deposition Subpoena Served on Steve on July
14 22, 2017; Motion for Attorneys Fees (Aug. 22, 2017) (hereinafter referred to as Mr.
15 Sanson's "Sworn Declaration"). Therein, Mr. Sanson described his off-the-record
16 communications with this Court about this matter. Upon reviewing Mr. Sanson's
17 Sworn Declaration, this Court determined that it should recuse from any further
18 proceedings in this matter. This determination is based on the findings stated on the
19 record at the August 30, 2017 hearing and additional findings stated herein.
20
21
22

23 It is undisputed that Defendant designated Mr. Sanson as a witness. Moreover,
24 although Mr. Jones argued it was unlikely, Defendant could not definitively rule out
25 the possibility that Mr. Sanson might be called as a witness in future proceedings. It
26 also is undisputed that Mr. Sanson made specific reference to this case in a
27 communication directed at this Court off the record. In fact, this Court scheduled an
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

immediate hearing in May 2017 to address Mr. Sanson's ex-parte communication with the Court.¹ Mr. Sanson's filing of his Sworn Declaration, however, was the first instance in which this Court became aware that Mr. Sanson had stated in writing the nature of his communications with the Court.

This Court noted that it was unaware of any legal authority that would excuse someone from a deposition who had been designated as a witness in the matter. This Court also noted its concern that the Subpoena Duces Tecum served on Mr. Sanson was overbroad and should be narrowed significantly. Because, however, this Court recognized the conflict created by Mr. Sanson's Sworn Declaration, the Court did not rule on the discovery motions and determined that the Court's recusal from this matter was appropriate.

In Mr. Sanson's Sworn Declaration, he acknowledged that he asked the Court off the record: "Why do you allow Marshal Willick to get away with so much

...
...
...
...

¹At the May 17, 2017 hearing, this Court disclosed Mr. Sanson's communications with the Court. This Court also noted for the record the nature of the Court's relationship with Mr. Sanson in the past. This has included this Court's endorsement by Veterans in Politics as a candidate for office and his prior professional communications about general issues (including Mr. Sanson repeatedly stating that he believed this Court should serve as the presiding judge in the Family Division). At the time of the May 2017 communication, Mr. Sanson was aware that litigation before the Court should never be discussed. Thus, any communication about a specific case was completely unexpected.

1
2 crap in Doug Ansell's case?"² For sake of completeness, the text messages and
3 telephone communication between Mr. Sanson and the Court took place as follows:

- 4 ● On May 11, 2017 at 8:20 p.m., Mr. Sanson texted: "Judge I need to
5 speak to you."
- 6 ● On May 12, 2017 at 6:52 a.m., the Court texted Mr. Sanson: "What do
7 you need to talk about?"
- 8 ● On May 12, 2017 at 9:29 a.m., Mr. Sanson responded with: "Call me at
9 your convenience or we can grab a cup of tea."
- 10 ● The Court called Mr. Sanson on May 13, 2017. After prefatory remarks
11 that included Mr. Sanson declaring that this Court should be the
12 presiding judge in the family division, Mr. Sanson, without prompting,
13 asked: "Why do you allow Marshal Willick to get away with so much
14 "crap" in Doug Ansell's case?"

15 ²On a number of occasions, this Court has lamented that *both* parties have engaged in,
16 to borrow Mr. Sanson's term, "crap" during this case. This Court repeatedly has chastised both
17 sides for their practice of hyperbole and exaggeration. Mr. Willick has almost incessantly
18 argued that this Court has allowed Defendant (Mr. Ansell) to get away with "crap" without
19 repercussion. Both Mr. Willick and Mr. Jones are adept at selectively handpicking those areas
20 of perceived wrongdoing of the other side and advocating through their myopic lenses. On Mr.
21 Jones' part, this was exemplified during the August 30, 2017 hearing through his argument that
22 the Court had given Plaintiff a "free pass" with respect to her alleged violation of the Order to
23 Seal Records (Oct. 16, 2015) (hereinafter referred to as the "Sealing Order"). The Sealing
24 Order *drafted and submitted by Defendant (Mr. Ansell)*, ordered that "all papers, records,
25 proceedings and evidence, including exhibits and transcripts of testimony in the above-entitled
26 matter, be, and the same hereby are, sealed and shall not be opened to inspection *except by the*
27 *parties* and their attorneys, or when required as evidence in another action or proceeding."
28 (Emphasis added). Mr. Jones' argument in Court notwithstanding, this matter was adjudicated
by the Court. See Order (Aug. 30, 2016). Thus, the Sealing Order *drafted and submitted by*
Defendant (Mr. Ansell), did not prohibit the conduct about which Defendant complained. NRS
125.110 provides that the papers sealed "shall not be open to inspection except *to* the parties
and their attorneys." The Sealing Order *prepared by Defendant* changed the statutory language
and provided that the papers sealed "shall not be opened to inspection except *by* the parties
and their attorneys." Recognizing the error of his own drafting, Defendant (Mr. Ansell)
submitted a second Order to Seal Records (Nov. 23, 2016). Mr. Jones knew these facts when
he lambasted the Court during the August 30, 2017 hearing for purportedly allowing Plaintiff
to violate a Sealing Order that did not proscribe the alleged conduct. Apart from these
examples of "crap," the Court has endured "crap" from *both* parties throughout this litigation.

- 1
- 2 ● After immediately terminating the call, this Court texted Mr. Sanson as
- 3 follows: "Please do not ever talk to me again about a pending case before
- 4 me. I hold you in higher esteem than that. I'm sorry to end the call so
- 5 abruptly. My integrity means too much to me than to be influenced by
- 6 others outside of the courtroom and it shakes the very core of our system
- 7 when anyone communicates with a judicial officer in this fashion. It
- 8 simply cannot happen. I know that you know that and I have always
- 9 trusted your judgment in that regard."
- 10 ● Mr. Sanson's immediate text response reads: "You asked me a question
- 11 because of our relationship I gave you my honest answer, so you can
- 12 understand what direction we are headed."

13 This Court scheduled a hearing immediately (heard on May 17, 2017) to

14 disclose the improper communication. Based on Mr. Sanson's testimony on August

15 30, 2017, he admitted that his communication with the Court was not intended to

16 relay specific factual information about the Ansell case. When offered the opportunity

17 to provide specific examples of "crap" perpetrated by Mr. Willick (such as a

18 miscalculation by Mr. Willick, a fabricated fact, or some other specific example of

19 "crap"), Mr. Sanson had nothing specific. As such, *the only purpose of his*

20 *communication with the Court was to influence and intimidate the Court through a*

21 *corrupt communication outside of court.*

22 Mr. Sanson could have limited his communication with the Court to a *general*

23 accusation that Mr. Willick "gets away with crap," and left it at that.³ If Mr. Sanson's

24 sole motivation was merely to attack Mr. Willick *in general* and not to influence the

25

26

27 ³Based on the papers filed herein, this Court is aware that litigation is pending between

28 Mr. Willick and Mr. Sanson. This Court's familiarity with this civil matter is limited to the

disclosures contained in the papers filed in the Ansell matter. The animosity resulting from

this civil litigation is palpable. Nevertheless, this animosity is not an excuse to attempt to

manipulate and intimidate this Court – *particularly in regards to a specific case.*

1
2 Court about a specific case, he could have done so. Although such communication
3 remains improper, it is more egregious that Mr. Sanson *knowingly and intentionally*
4 *identified Doug Ansell's case*. It also is significant that Mr. Sanson's response was not
5 to offer an apology, or to assure the Court that he would refrain from doing so again.
6 Even at the August 30, 2017 hearing, Mr. Sanson remained unapologetic. In fact, his
7 demeanor and conduct was defiant, even lashing out at Mr. Willick to the point of
8 being admonished by the Court. Instead of apologizing to the Court, his follow-up
9 communication was a veiled threat to the Court. This threat by Mr. Sanson, as stated
10 by Mr. Sanson and interpreted by the Court, was to harass the Court and to hurl
11 baseless and defamatory accusations about the Court.
12

13
14 Mr. Sanson argues that his organization "exposes public corruption and
15 injustices." Further, despite the fact that Mr. Ansell designated Mr. Sanson as *his*
16 witness, Mr. Sanson states with emphasis that neither he nor VIPI "*have anything to do*
17 *with this case*." To reiterate for the record, Mr. Sanson intentionally interjected himself
18 into this matter by communicating with the Court in reference to this specific case.
19 Plaintiff understandably and justifiably has sought to determine the full extent of such
20 off-the-record communications. To be clear, however, Mr. Sanson's involvement in this
21 matter is not about exposing "injustice" or corruption. Mr. Sanson acknowledged that
22 he had never met Plaintiff and proclaimed that he meant her no "ill will." Indeed, Mr.
23 Sanson appeared to be unaware that Defendant (Doug Ansell) was the prevailing party
24 with respect to the child custody issues in this case – an issue that is of the highest
25 significance in *most* cases.
26
27
28

1
2 As noted previously, when given the opportunity at the August 30, 2017 hearing
3 to explain the "crap" that was occurring in the Ansell matter, Mr. Sanson was unable
4 to identify any singular fact. As such, notwithstanding his self-proclaimed faux cover
5 of seeking to "expose injustice and corruption," Mr. Sanson's sole motivation for
6 communicating with this Court was to intimidate and harass the Court. Mr. Sanson
7 proudly proclaims that he has "declared war" on the Family Court. There is no doubt
8 that the courts are under attack and that the entire judiciary of this great State of
9 Nevada is on notice that, behind that false banner of "justice and corruption" is an
10 individual and group who seek to manipulate, intimidate and control. The arsenal of
11 weapons that Mr. Sanson utilizes include attempts to manipulate, intimidate and
12 control the judicial process through off-the-record communications. This case has
13 exposed the reality of his tactics.
14
15
16

17 Rather than apologize for his unethical and corrupt conduct, *Mr. Sanson has the*
18 *audacity to blame this Court for his improper communication.* Specifically, Mr. Sanson
19 alleges under oath in his Sworn Declaration that his off-the-record *question* to the Court
20 was somehow an answer to a same-day related conversation. The timing of this entire
21 narrative offered by Mr. Sanson is significant as it belies Mr. Sanson's story. Mr.
22 Sanson alleges in his Sworn Declaration that his originating text message took place on
23 the *same day* as a conversation with the Court in the courtroom (i.e., May 11, 2017).
24 To this end, Mr. Sanson's narrative suggests that his text message was intended merely
25 to follow-up on a conversation earlier that same day. Mr. Sanson's narrative, however,
26 is a *factual impossibility*. In this regard, May 11, 2017 was this Court's Chamber
27
28

1
2 Calendar day. No hearings were scheduled in Department Q on May 11, 2017. There
3 was no conversation on May 11, 2017 as Mr. Sanson has alleged.⁴ Regardless, even if
4 Mr. Sanson's sworn recitation of facts is believed, his communication with the Court
5 *remains improper.*
6

7 What should be frightening to this Court (and members of the Nevada judiciary
8 in general), is that Mr. Sanson refused to acknowledge at the August 30, 2017 hearing
9 that his communication with the Court about a pending case was inappropriate.
10 Specifically, Mr. Sanson, through his counsel, suggested it was the Court's fault based
11 on the earlier conversation cited above. This Court reiterates that it is inappropriate
12 to communicate with a judicial officer off the record about a pending case – *at any*
13 *time and under any circumstances.* Mr. Sanson's attempts to deflect blame to the
14 Court are appalling.
15
16

17 This Court's abrupt termination of the telephone call and immediate text to Mr.
18 Sanson that his communication was inappropriate was not Mr. Sanson's desired
19 response or reaction from the Court. It is now obvious that Mr. Sanson was looking
20 for a response from the Court more along the lines of: "I'm so sorry Mr. Sanson, I'll
21 make sure that Mr. Willick doesn't get his way," or, "I'm so sorry Mr. Sanson, I'll make
22 sure Mr. Ansell comes out on top," or even, "message received Mr. Sanson." *Is there*
23
24
25

26
27 ⁴This is not simply a matter of "oops, I got the date wrong." Any change to the date
28 changes the entire narrative and creates a logical disconnection in time. This Court's staff
checked the videotape of the hearings in all cases held in Department Q on the preceding
Monday, Tuesday, and Wednesday of that same week and was unable to find Mr. Sanson in
the gallery at the beginning or conclusion of any case.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

anything more corrupt than the influence Mr. Sanson sought to exert over the Court?

And he proclaims that he seeks to expose corruption? Because this Court called him out on the inappropriateness of his communication and refused to kowtow and cower to his manipulation and control, Mr. Sanson predictably let the Court know that his wrath was coming out against the Court. This type of threat to any judicial officer strikes at the very core of the integrity of the judicial process. Moreover, such threatening behavior is an attempt to manipulate and control judicial officers if they do not succumb to Mr. Sanson's desired result.

Mr. Jones argued that there is no evidence that Defendant had anything to do with Mr. Sanson's communication with the Court or that he put Mr. Sanson "up to it." Mr. Jones is correct that there was no testimony offered that indicates that Defendant is responsible for Mr. Sanson's behavior. Defendant did not appear at the hearing to offer his version of events. Although this Court is unable to attribute Mr. Sanson's actions to Defendant directly, this Court notes that Mr. Sanson's communication with the Court was not the first, nor the second, occasion in which the Court has received outside communications about Defendant.⁵

⁵This Court previously disclosed at a prior hearing that an individual recently employed by Defendant was this Court's direct ecclesiastical leader (Kurt Teshima). This Court disclosed to the parties that the Court holds Mr. Teshima in high esteem. These disclosures were made for full transparency in the event that either party desired that the Court recuse from the matter. Mr. Willick offered (as an offer of proof) at the August 30, 2017 hearing that Defendant, *together with Mr. Sanson*, had a breakfast meeting with Mr. Teshima. As an additional offer of proof, when Defendant and Mr. Sanson attempted to discuss the divorce, Mr. Teshima redirected the conversation to business matters. This Court is not surprised by this redirection by Mr. Teshima and emphasizes that at no time has Mr. Teshima *ever* discussed this matter with the Court. This Court has never felt any pressure or attempts to influence the path of this case from Mr. Teshima.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

This Court recognizes the judicial duty to sit. Mr. Sanson's Sworn Declaration filed on August 22, 2017, however, creates a conflict for the Court. Moreover, it has become evident based on the history of this matter that any decision by this Court that favors Defendant in any manner is perceived by Plaintiff as being influenced by something that has happened outside of this courtroom. Similarly, Defendant may have the perception that, because this Court has declared its disgust and disdain for outside efforts to influence this matter, the Court is somehow overcompensating to counter Plaintiff's perception. These perceptions (although untrue on both accounts) are unfair to both parties. Accordingly, it is appropriate that this Court recuse from this matter.

Finally, because there have been outside attempts to influence this Court in this matter, complete transparency is warranted to maintain public confidence in the administration of justice. Notably, Mr. Sanson (through counsel) argued that this matter was improperly sealed. To clarify this Court's findings at the August 30, 2017 hearing, this Court concurs that the hearings in this matter and orders entered by the Court should not be sealed and should be available for public inspection. However, this Court recognizes that filings of the parties and experts contain sensitive information related to both custody issues and financial issues. Consistent with NRS 125.110, those papers should remain sealed.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Based on the foregoing, and good cause appearing therefor,

It is hereby ORDERED that this Court RECUSE from this case. It is further ORDERED that, to the extent possible, this matter be referred to the Senior Judge Program for further proceedings.

It is further ORDERED that the hearings pending before this Court, including trial dates and hearings related to discovery issues, should be re-calendared upon the reassignment of this matter.

It is further ORDERED that the hearing videos and orders entered by this Court should be unsealed.

DATED this 5th day of September, 2017.

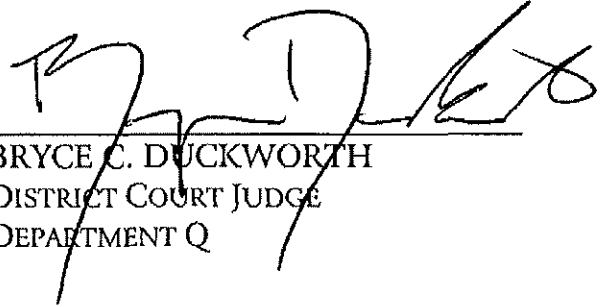
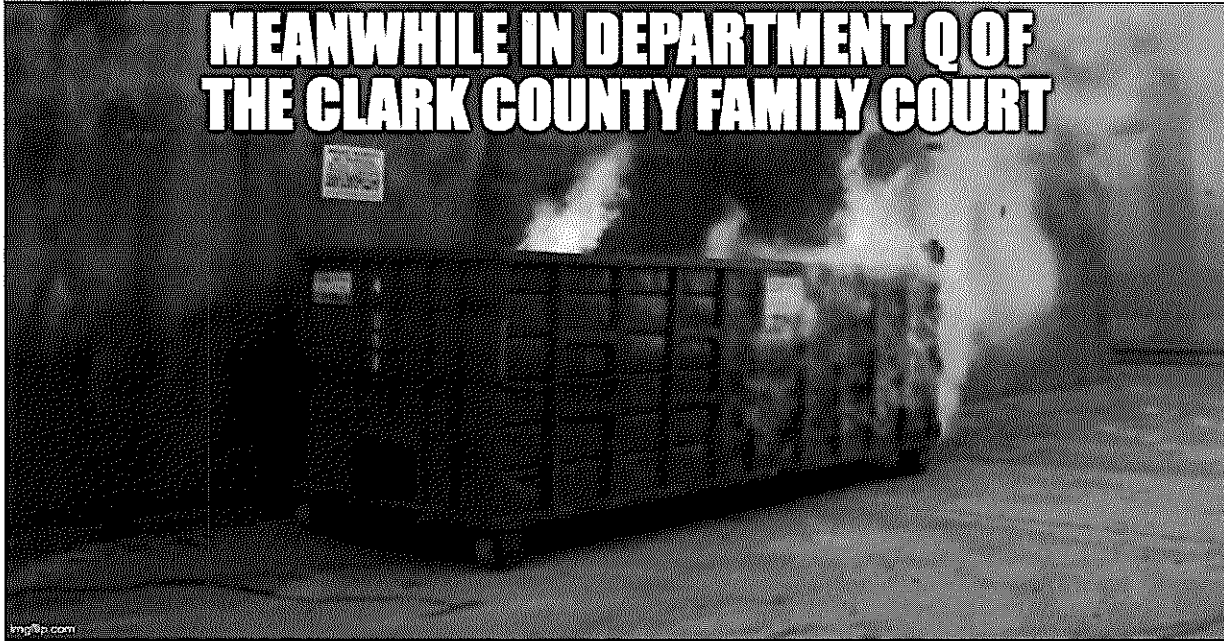

BRYCE C. DUCKWORTH
DISTRICT COURT JUDGE
DEPARTMENT Q

EXHIBIT 6

EXHIBIT 6

EXHIBIT 6

MEANWHILE IN DEPARTMENT Q OF THE CLARK COUNTY FAMILY COURT



imgflip.com



Steve Sanson

Follow · May 16, 2017 · 🌐

Family Court Judge Bryce Duckworth was endorsed by Veterans In Politics International, when he first ran for office and we helped work to get him into office. We also recommended him to be the Presiding Judge over Family Court. But somewhere along the way something happened and as an organization, we are sickened by many of his rulings, his lack of ability to control his courtroom and he repeatedly fails to hold litigants in contempt when they violate the court orders — with Steve Sanson.

👍 Like

💬 Comment

➦ Share

👤 🗨️ 📧 13



Write a comment...



Press Enter to post.

EXHIBIT 7

EXHIBIT 7

EXHIBIT 7

From: Veterans In Politics International Inc. <devlldog1285@cs.com>
Sent: Saturday, November 18, 2017 3:34 PM
To: JVA Group
Subject: Jordan Ross & Mark Bailus & Lindsey Licari to appear on the Veterans In Politics video Talk-show

Having trouble viewing this email? [Click here www.veteransinpolitics.org](http://www.veteransinpolitics.org)
Hi, just a reminder that you're receiving this email because you have expressed an interest in Veterans In Politics International Inc.. Don't forget to add devlldog1285@cs.com to your address book so we'll be sure to land in your inbox!

You may [unsubscribe](#) if you no longer wish to receive our emails.



**VETERANS
IN POLITICS**

**Jordan Ross & Mark Bailus & Lindsey
Licari
to appear on the Veterans In Politics
video talk-show**

Call into the show (702) 685-8380



MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
5/25/2017	1.8	Margaret McLetchie	\$450.00	Revise reply to motion to seal re Saiter documents. Draft reply ISO Motion to Strike. Revise reply re 12(b)(5) draft.	\$810.00
5/26/2017	4.7	Alina Shell	\$350.00	Attention to reply to opposition to anti-SLAPP motion to dismiss: draft sections regarding what constitutes a public interest and address Plaintiffs' argument re "republication."	\$1,645.00
5/26/2017	0.9	Margaret McLetchie	\$450.00	Work on reply; follow up re deadline for same.	\$405.00
5/26/2017	0.2	Pharan Burchfield	\$150.00	Finalize, file, and serve (electronic and mail) Defendants Steve W. Sanson and Veterans in Politics International, Inc.'s Request to Unseal Exhibit 13 to their Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (anti-SLAPP).	\$30.00
5/30/2017	1.4	Alina Shell	\$350.00	Research for reply to opposition to motion to dismiss re verification of facts.	\$490.00
5/30/2017	1.8	Alina Shell	\$350.00	Expand section in reply to opposition to motion to dismiss re failure to state a claim for defamation.	\$630.00
5/30/2017	1.2	Alina Shell	\$350.00	Attention to response to argument in Plaintiffs' opposition to Anti-SLAPP regarding right to limited discovery. Review section in opposition re limited discovery. Legal research re same. Draft section.	\$420.00
5/30/2017	2.8	Alina Shell	\$350.00	Resume drafting reply to opposition to Anti-SLAPP motion: re-read opposition section regarding publication. Research arguments in opposition. Re-draft section on republication. Review drafted arguments re Anti-SLAPP elements and email to Ms. McLetchie.	\$980.00
5/30/2017	2	Leo Wolpert	\$175.00	Edit and finalize omnibus replies to motions to dismiss, motion to strike.	\$350.00
5/30/2017	3.8	Margaret McLetchie	\$450.00	Editing and revising of reply. Circulate to client. Attention to motion for excess pages.	\$1,710.00

MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
5/30/2017	2.3	Pharan Burchfield	\$150.00	Finalize (proof, format, create tables of contents and tables of authorities), file and serve/mail VIPI Defendants' Omnibus Reply to: (1) Plaintiff's Opposition to Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP); and (2) Plaintiff's Opposition to Motion to Dismiss and Countermotion for Attorney's Fees.	\$345.00
5/30/2017	0.2	Pharan Burchfield	\$150.00	Finalize, file, and serve/mail Reply to Plaintiffs' Opposition to Motion to Strike and Opposition to Plaintiff's Countermotion for Attorney's Fees.	\$30.00
5/30/2017	0.5	Pharan Burchfield	\$150.00	Draft, incorporate Ms. McLetchie's edits, file, and serve/mail Motion for Excess Pages re Omnibus Reply.	\$75.00
5/31/2017	0.8	Pharan Burchfield	\$150.00	Create hard-copy courtesy copies of entire briefing to Honorable Judge Leavitt in preparation of upcoming motions hearing. Direct Ms. Lopez (admin) to delivery to Department 12.	\$120.00
6/1/2017	0.3	Admin Admin	\$25.00	Dropped off three binders of Motion to Dismiss at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 department 12.	\$7.50
6/1/2017	0.1	Pharan Burchfield	\$150.00	Email client file-stamped copies of recent pleadings in Abrams v. Schneider et al. case.	\$15.00
6/4/2017	5.3	Leo Wolpert	\$175.00	Assist Ms. McLetchie in preparing for 6/5 hearing by charting out, summarizing and gathering quotes from cases relevant to arguments, charting out how to argue that each allegedly defamatory statement is non actionable.	\$927.50
6/4/2017	8.2	Margaret McLetchie	\$450.00	Hearing preparation. Review all materials and prepare outline.	\$3,690.00
6/5/2017	4.4	Margaret McLetchie	\$450.00	Prepare for hearing; attend hearing/argue.	\$1,980.00

MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
6/6/2017	0.8	Margaret McLetchie	\$450.00	Preliminary review of Plaintiffs' supplemental opposition. Research re same.	\$360.00
6/7/2017	1	Alina Shell	\$350.00	Read supplement to Plaintiffs' omnibus opposition. Draft initial portion of response. Email to Ms. McLetchie.	\$350.00
6/7/2017	2.1	Margaret McLetchie	\$450.00	Review and analyze supplemental opposition. Work on supplemental reply addressing: (1) supp. opp. filed by Plaintiffs; (2) issues re publication of mass emails. Client declaration.	\$945.00
6/8/2017	5.6	Margaret McLetchie	\$450.00	Research and drafting of supplemental reply; review and edit.	\$2,520.00
6/9/2017	0.3	Alina Shell	\$350.00	Proofread response to supplement to omnibus opposition.	\$105.00
6/9/2017	3.4	Margaret McLetchie	\$450.00	Further revising of supplemental reply; add discussion re /exhibits/revise declaration re assertion that Mr. Saiter requested take-down.	\$1,530.00
6/9/2017	1	Pharan Burchfield	\$150.00	Finalize, file, and serve/mail VIPI Defendants' Supplement to VIPI Defendants' Omnibus Reply to: (1) Plaintiffs' Opposition to Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP); and (2) Plaintiffs' Opposition to Motion to Dismiss and Countermotion for Attorneys' Fees. Meeting with client.	\$150.00
6/12/2017	0.4	Admin Admin	\$25.00	Dropped off: VIPI Defendants' Supplement to VIPI Defendants' Omnibus Reply to: (1) Plaintiffs' Opposition to Special Motion to Dismiss Pursuant to Nev. Rev. Stat 41.600 (Anti - SLAPP); and (2) Plaintiffs' Opposition to Motion to Dismiss and Countermotion for Attorneys' Fees at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 department 12.	\$10.00
6/22/2017	0.2	Margaret McLetchie	\$450.00	Attention to fee application issues.	\$90.00

M C L E T C H I E S H E L L

Date	Time Expended	Billor	Rate	Description	Total
6/22/2017	0.6	Margaret McLetchie	\$450.00	Review minutes. Call with client. Take call from reporter.	\$270.00
6/27/2017	0.9	Alina Shell	\$350.00	Begin drafting proposed order granting anti-SLAPP motion to dismiss.	\$315.00
6/28/2017	0.6	Alina Shell	\$350.00	Resume drafting proposed order.	\$210.00
6/28/2017	0.1	Margaret McLetchie	\$450.00	Respond to opposing counsel request re review order.	\$45.00
6/28/2017	0.3	Margaret McLetchie	\$450.00	Emails with client.	\$135.00
6/29/2017	0.2	Margaret McLetchie	\$450.00	Emails with client.	\$90.00
6/29/2017	0.2	Margaret McLetchie	\$450.00	Attention to preliminary work on fees motion, and research re same.	\$90.00
7/3/2017	2.1	Alina Shell	\$350.00	Draft proposed order granting VIPI Defendants' anti-SLAPP motion to dismiss.	\$735.00
7/3/2017	1.5	Alina Shell	\$350.00	Incorporate Ms. McLetchie's and Mr. Wolpert's edits into proposed order.	\$525.00
7/3/2017	2.8	Alina Shell	\$350.00	Per Ms. McLetchie's request, expand proposed order granting anti-SLAPP motion to dismiss.	\$980.00
7/3/2017	0.5	Leo Wolpert	\$175.00	Per Ms. Shell's request, proofread order granting anti-SLAPP motion to dismiss.	\$87.50
7/3/2017	0.9	Margaret McLetchie	\$450.00	Direct Ms. Shell re expanding order. Email to counsel for Schneider. Email to opposing counsel.	\$405.00
7/5/2017	0.5	Admin Admin	\$25.00	Made payment for transcript (June 5, 2017 hearing) to Clark County Treasurer, and LGM Transcription Services at the Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101.	\$12.50
7/5/2017	0.8	Alina Shell	\$350.00	Review transcript of 6/27/17 hearing on anti-SLAPP motion. Incorporate facts from transcript into proposed order granting anti-SLAPP motion.	\$280.00
7/5/2017	0.4	Leo Wolpert	\$175.00	Edit and proofread order granting anti-SLAPP motion to dismiss.	\$70.00

MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
7/5/2017	1	Margaret McLetchie	\$450.00	Revise draft proposed order and provide to C.J. Potter, and to opposing counsel.	\$450.00
7/5/2017	0.4	Pharan Burchfield	\$150.00	Finalize Proposed Order and letter from Ms. McLetchie to Mr. Gilmore; send re same.	\$60.00
7/6/2017	0.7	Admin Admin	\$25.00	Dropped off letter address to Judge Leavitt dated July, 6, 2017 at the Regional Just Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$17.50
7/6/2017	0.3	Margaret McLetchie	\$450.00	Emails and call with opposing counsel, Josh Gilmore, re extension of deadline to submit proposed order. Edit draft letter to chambers re same/ approve and sign.	\$135.00
7/6/2017	0.1	Pharan Burchfield	\$150.00	Finalize and send (via email) Ms. McLetchie's letter to Honorable Judge Leavitt re extension of time to submit proposed order.	\$15.00
7/13/2017	0.1	Pharan Burchfield	\$150.00	Provide client with copies of Mr. Gilmore's edits to Ms. McLetchie's proposed order.	\$15.00
7/14/2017	1	Alina Shell	\$350.00	Review Mr. Gilmore's redlines to draft proposed order. Edit and send to Ms. McLetchie for review.	\$350.00
7/14/2017	0.3	Margaret McLetchie	\$450.00	Attention to issues re proposed order, edits from opposing counsel. Review same.	\$135.00
7/14/2017	0.4	Pharan Burchfield	\$150.00	Draft and send (hand-deliver and email) letter to Judge Leavitt with proposed order. Prepare proposed order to be submitted to Court. Email same to opposing counsel. Email client re same.	\$60.00
7/19/2017	0.2	Pharan Burchfield	\$150.00	Draft Stipulation and Proposed Order re extension of deadline to file Motion for Attorney's Fees Application pursuant to NRS 41.670.	\$30.00

MCLETCHE SHELL

Date	Time Expended	Billor	Rate	Description	Total
7/20/2017	0.5	Admin Admin	\$25.00	Dropped off: Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$12.50
7/20/2017	0.5	Admin Admin	\$25.00	Picked up: Mr. Potter's signature at: 1125 Shadow Ln, Las Vegas, NV 89102 for Stipulation and [Proposed] Order.	\$12.50
7/20/2017	0.5	Admin Admin	\$25.00	Picked up: Stipulation and Proposed Order at Bailey Kennedy Attorneys at Law: 8984 Spanish Ridge Ave, Las Vegas, NV 89148.	\$12.50
7/20/2017	0.1	Alina Shell	\$350.00	Phone call to co-defendant counsel CJ Potter regarding stipulation to extend date for motion for fees.	\$35.00
7/20/2017	0.4	Alina Shell	\$350.00	Redline Mr. Gilmore's re-draft of stipulation to extend. Phone call with Mr. Gilmore re same. Review follow-up email from Mr. Gilmore.	\$140.00
7/20/2017	0.2	Margaret McLetchie	\$450.00	Attention to stipulation.	\$90.00
7/24/2017	0.1	Margaret McLetchie	\$450.00	Approve NEOJ.	\$45.00
7/24/2017	0.4	Pharan Burchfield	\$150.00	File Order Granting VIPI Defendants' Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP); draft, file, and serve/mail Notice of Entry of Order re same; email client re same.	\$60.00
7/25/2017	0.1	Margaret McLetchie	\$450.00	Emails re deadline for attorney fee / other NRS award application.	\$45.00
7/26/2017	0.4	Admin Admin	\$25.00	Picked up: Stipulated and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$10.00
7/26/2017	0.3	Pharan Burchfield	\$150.00	File Stipulation and Order (extension motion for attorneys' fees); draft, file, and serve/mail Notice of Entry of Order re same. Update calendar deadlines accordingly.	\$45.00
8/4/2017	0.2	Margaret McLetchie	\$450.00	Call with client.	\$90.00

M C L E T C H I E S H E L L

Date	Time Expended	Billor	Rate	Description	Total
8/7/2017	0.9	Margaret McLetchie	\$450.00	Research re application for attorney's fees.	\$405.00
8/7/2017	0.3	Margaret McLetchie	\$450.00	Call with Mr. C.J. Potter; attention to editing stipulation for extension drafted by paralegal; various communications re same.	\$135.00
8/8/2017	0.2	Admin Admin	\$25.00	Picked up: Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$5.00
8/8/2017	0.4	Admin Admin	\$25.00	Dropped off: Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$10.00
8/8/2017	0.4	Admin Admin	\$25.00	Picked up: Mr. Potter's signature for a Stipulation and [Proposed] Order at Potter Law Offices: 1125 Shadow Ln, Las Vegas, NV 89102.	\$10.00
8/8/2017	0.4	Admin Admin	\$25.00	Picked up: Stipulation and [Proposed] Order at Potter Law Offices: 1125 Shadow Ln, Las Vegas, NV 89102.	\$10.00
8/8/2017	0.8	Admin Admin	\$25.00	Picked up: Stipulation and [Proposed] Order at Bailey Kennedy, LLP: 8984 Spanish Ridge Ave, Las Vegas, NV 89148.	\$20.00
8/8/2017	0.4	Admin Admin	\$25.00	Dropped off: Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$10.00
8/8/2017	0.1	Alina Shell	\$350.00	Phone call with CJ Potter re obtaining new signature on stipulation to extend time for filing motion for attorney's fees. Email update to Ms. McLetchie re same.	\$35.00
8/8/2017	0.1	Margaret McLetchie	\$450.00	Email from opposing counsel; follow-up re extension.	\$45.00
8/16/2017	0.1	Alina Shell	\$350.00	Attention to obtaining costs documentation.	\$35.00

MCLETCHE SHELL

Date	Time Expended	Billor	Rate	Description	Total
8/17/2017	0.6	Admin Admin	\$25.00	Picked up: Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$15.00
8/17/2017	0.1	Alina Shell	\$350.00	Phone call from Ira Victor regarding invoice for services.	\$35.00
8/17/2017	0.3	Pharan Burchfield	\$150.00	File Stipulation and Order. Draft, file, and serve/mail Notice of Entry of Order re same. Update calendar accordingly.	\$45.00
8/21/2017	6.2	Alina Shell	\$350.00	Attention to attorney's fees motion: legal research regarding appropriate work to include in request fees in Anti-SLAPP cases. Draft motion for attorney's fees and discuss same with Ms. McLetchie. Confer with CJ Potter regarding whether an additional extension of time is necessary in light of Cal Potter's health issues. Email and voicemail to Josh Gilmore re same. Review costs incurred in litigation for inclusion in Motion. Circulate to Ms. McLetchie and Mr. Wolpert for review.	\$2,170.00
8/22/2017	0.5	Admin Admin	\$15.00	Picked up: Mr. Potter's signature at the Potter Law Offices: 1125 Shadow Ln, Las Vegas, NV 89102 for the Stipulation and [Proposed] Order.	\$7.50
8/22/2017	0.6	Admin Admin	\$25.00	Picked up: Signed Stipulation and [Proposed] at Bailey Kennedy: 8984 Spanish Ridge Ave, Las Vegas, NV 89148.	\$15.00
8/22/2017	0.6	Admin Admin	\$25.00	Dropped off: Stipulation and [Proposed] Order at the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$15.00

MCLETCHE SHELL

Date	Time Expended	Billor	Rate	Description	Total
8/22/2017	0.2	Alina Shell	\$350.00	Draft stipulation to extend deadline for filing motions pursuant to NRS 41.670. Circulate to parties.	\$70.00
8/22/2017	0.1	Margaret McLetchie	\$450.00	Confer with Ms. Shell re extension.	\$45.00
8/31/2017	0.5	Admin Admin	\$25.00	Picked up: Stipulation and [Proposed] Order that the Las Vegas Regional Justice Center: 200 Lewis Ave. Las Vegas, NV, 89101 Department 12.	\$12.50
8/31/2017	0.1	Margaret McLetchie	\$450.00	Review approved order on schedule for fees and costs application.	\$45.00
8/31/2017	0.3	Pharan Burchfield	\$150.00	File Stipulation and Order (third extension re attorney's fees application). Draft, file, and serve/mail Notice of Entry of Order re same. Update calendar accordingly.	\$45.00
9/1/2017	0.1	Pharan Burchfield	\$150.00	Email to client.	\$15.00
9/11/2017	0.1	Alina Shell	\$350.00	Phone call to Mr. Gilmore regarding settlement statement due on 9/15. Left voicemail.	\$35.00
9/11/2017	0.5	Alina Shell	\$350.00	Review and make revisions to motion for attorney's fees. Edit declaration in support of fees for Ms. England's signature. Email both to Ms. McLetchie for review.	\$175.00
9/11/2017	0.1	Margaret McLetchie	\$450.00	Approve notice of entry of order.	\$45.00
9/11/2017	0.1	Margaret McLetchie	\$450.00	Confer with Ms. Shell re assignment to settlement judge.	\$45.00
9/11/2017	1.5	Margaret McLetchie	\$450.00	Attention to work for attorney fee application.	\$675.00
9/12/2017	0.9	Alina Shell	\$350.00	Edit time entry spreadsheet for inclusion in fee application.	\$315.00
9/12/2017	0.3	Alina Shell	\$350.00	Edit declaration for Mr. Sanson. Meet with Mr. Sanson re same.	\$105.00

MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
9/12/2017	0.3	Alina Shell	\$350.00	Additional edits to Ms. England's declaration in support of attorney/paralegal rates.	\$105.00
9/12/2017	4.5	Alina Shell	\$350.00	Revise motion for attorney's fees and costs. Compile exhibits. Finalize and file motion and exhibits.	\$1,575.00
9/12/2017	2.2	Margaret McLetchie	\$450.00	Attorney fee application	\$990.00
9/12/2017	2.0	Leo Wolpert	\$175.00	Edit and review costs/fees for attorney fee application.	\$350.00
				TOTAL	\$91,090.00

TOTALS BY BILLER:

Billor	Time Expended (Hours)	Total Billed
Pharan Burchfield	26.8	\$4020.00
Gabriel Czop	5.2	\$490.00
Daniela Lopez (Admin Admin)	9.9	\$242.50
Margaret McLetchie	106.5	\$47,925.00
Alina Shell	55.5	\$19,425.00
Leo Wolpert	108.5	\$18,987.50
TOTAL	312.4	\$91,090

EXHIBIT 2

EXHIBIT 2



What Our Clients are Saying

We are a personal injury law firm that focuses on our clients best interests. We are not like the mega attorneys who just look to settle cases as quickly as possible. We look at the value a case deserves and then work tirelessly to ensure you get the benefits you deserve after being injured.



Personal Injury

We help those who have been injured due the actions of another. We help people recover from injuries that were the direct cause of someone else's negligence or malice.



Security and Police Misconduct

We hold the police accountable for their misconduct and mistreatment of those who were incarcerated or suspected of crimes. We ensure the proper use of force was applied and people's civil rights are not violated.



Potter Law - Attorneys on Your Team!

When you are injured by the actions or neglect of someone, you need someone on your team. Recovering from an accident should be your only job. Our system too often makes the victim feel like they are doing something wrong when they are seeking to hold those responsible accountable. We are here to win you every dollar you deserve, because if you don't get paid, we don't get paid. We are truly a partnership and we look out for our clients best interests. Give us a call to work with a law firm with 30+ years of experience in personal injury.

Why Potter Law Offices

- ✓ 30+ Years of Experience
- ✓ Personal Injury Specialists
- ✓ Expert Negotiators
- ✓ Caring Attorneys
- ✓ Wide Experience in Cases
- ✓ No Sleepless Nights
- ✓ Best Results
- ✓ Highly Respected
- ✓ No Judgment
- ✓ Amazing Communication

What to Expect When Working With Potter Law Offices

We believe in timely communication between you and our attorneys. We are available for you. Our attorneys talk to you and explain where your case is at during every stage of preparation.

We work with you, go over all the case details, find out your full story. We help you understand the risks as well as the potential rewards. At this point we put together a gameplan for your case with deadlines and contact information so you can stay involved at all stages of your case.

We help our clients win big awards. Attorneys who are afraid to go to trial will settle cases for pennies on the dollar. We do what is best for you and your loved ones based on the facts of the case. Our commitment to you is to help you get what is possible given the facts of your case.

CONTACT US

Scared about your future? We are here to support members of our community who have had bad things happen to them. Call our offices to get a free phone consultation. Engaging in a consultation does not constitute an attorney client relationship. We are here to help you get the justice you deserve.

1125 Shadow Lane Suite 100

Las Vegas, NV 89102-2314

Name

Email

Your name

Your email

Your Message

Your message

SEND



[Home \(http://potterlawoffices.com/\)](http://potterlawoffices.com/) [Firm Overview \(https://www.potterlawoffices.com/firm/\)](https://www.potterlawoffices.com/firm/)

[Practice Areas \(https://www.potterlawoffices.com/practice-areas/\)](https://www.potterlawoffices.com/practice-areas/) [Blog \(https://www.potterlawoffices.com/blog/\)](https://www.potterlawoffices.com/blog/)

[Contact Us \(https://www.potterlawoffices.com/contact/\)](https://www.potterlawoffices.com/contact/)

COPYRIGHT 2017 - Potter Law Offices - All Rights Reserved

 (<https://www.twitter.com>)  (<https://www.facebook.com>)  (<https://plus.google.com>)

EXHIBIT 3

EXHIBIT 3

POTTER LAW OFFICES

(<https://www.potterlawoffices.com/>)



Potter Law Offices is a highly specialized law firm staffed with experienced, aggressive, and qualified trial attorneys and legal professionals. We provide superior legal services to individuals, with an emphasis on representing those with personal injuries, those accused of a crime, and those with serious brain, spinal and orthopedic injuries. We are dedicated to protecting every client's legal rights.

Since our firm's founding in 1978, we have successfully represented thousands of clients in Nevada and elsewhere. We have steadily expanded our legal expertise in various areas and our ability to provide the services needed by our clients. We are AV-rated – the highest rating given for legal ability and ethical standards – by the Martindale-Hubbell Law Directory.

All of our attorneys are active in professional organizations and civic affairs.

Potter Law Offices offers a FREE phone consultation. Call our office, and one of our qualified attorneys will discuss your legal questions with you. In most civil cases, our legal fees are paid on a contingency basis. If our attorneys do not recover for you – there is no fee.

Potter Law Offices is a Union Privilege Legal Services participant, offering AFL-CIO members, and their families, legal expertise in the areas of personal injury, professional negligence, civil rights, Criminal Defense, and wrongful death.

CONTACT US

Scared about your future? We are here to support members of our community who have had bad things happen to them. Call our offices to get a free phone consultation. Engaging in a consultation does not constitute an attorney client relationship. We are here to help you get the justice you deserve.

1125 Shadow Lane Suite 100

Las Vegas, NV 89102-2314

Name

Email

Your name

Your Message

Your email

Your message

SEND

POTTER
LAW OFFICES



COPYRIGHT 2017 - Potter Law Offices - All Rights Reserved

JVA001198

 (<https://www.twitter.com>)  (<https://www.facebook.com>)


 (<https://plus.google.com>)

EXHIBIT 4

EXHIBIT 4



Veterans In Politics International
@VIPstavesanson

- Home
- About
- Photos
- Reviews
- Videos
- Events
- Join My List

Posts

Community

Veterans In Politics International, Inc.

To educate, organize, and awaken our veterans and their families to select, support, and intelligently vote for those candidates whom would help create a better world, free ourselves from our own government(s) in a culture of corruption, and to be the voice for those in other groups who do not have one.



Become a member at
www.VeteransInPolitics.org



Like Follow Share

Contact Us Message

Status Photo/Video

Write something on this Page...

Veterans In Politics International shared Steve Sanson's post.
October 19 at 9:50am ·

Steve Sanson
October 19 at 9:43am ·
Clark County Family Court Judge Rena "GOD" Hughes gets slammed by the Nevada Judicial Discipline Commission:

judicial.nv.gov
JUDICIAL.NV.GOV

Like Comment Share

17

Write a comment...

Veterans In Politics International
15 hrs ·

Clark County Family Court Judge Mathew Harter filed his affidavit and asserts the following:

1. He files an affidavit in response when a motion to disqualify was filed with an affidavit in support of it was filed concurrently. Surely the sitting Family court judge knows the law and that his affidavit holds no weight as to his claims he isn't biased?
2. Judge Harter says the defendants are litigious because they filed their motion, affidavit and exhibits to disqualify him and... [See More](#)

files.constantcontact.com
FILES.CONSTANTCONTACT.COM

Like Comment Share

Top Comments

1 Share

Write a comment...

John Ridgeway We need to get some Popcorn going now. This Circus could draw a crowd. Good Job
Like · Reply · 1 · 5 hrs

Search for posts on this Page

Visitor Posts

Richard Carreon
September 20 at 11:36am
Come and join Student Veterans Of America, Forgotten Not Gone, Mergi... [See More](#)

Like · Comment

Tim Petarra
August 24 at 11:00pm

The disrespect

Like · Comment

Barry Michaels
August 19 at 9:09am

I'm Barry Michaels and I'm running for the U.S. Senate in Nevada as ... [See More](#)

Like · Comment

English (US) · Español · Português (Brasil) · Français (France) · Deutsch


Privacy · Terms · Advertising · Ad Choices · Cookies · More
Facebook © 2017



Chat (6)


Veterans In Politics International
15 hrs ·

THE POWER OF SPEAKING UP!




THE POWER OF SPEAKING UP!
WEB-EXTRACT.CONSTANTCONTACT.COM

1

 Write a comment...


Veterans In Politics International
21 hrs ·


This is the same type of unlawful behavior that has been demonstrated by Clark County Family Court Judge Mathew Harter.
<https://www.rawstory.com/.../mississippi-judge-resigns-after.../>




Mississippi judge resigns after barring mother from seeing her baby for 14 months over unpaid court fees
A Mississippi judge who barred a mother from seeing her newborn baby for 14 months because she hadn't paid court-imposed fees has stepped down.
RAWSTORY.COM

4 Top Comments

 Write a comment...

 **Shelley Wilson** See that down turned mouth, that is your first clue as to what type of person he is.
Like · Reply · 4 hrs

 **Carl P Larson** Sick Bastard
Like · Reply · 1 · 10 hrs

Veterans In Politics International shared **NowThis Politics's** video.
October 25 at 4:32pm ·

Chat (6)

-4:09

8,815,699 Views

NowThis Politics

Like Page

October 23 at 1:55pm ·

Ben Carson wouldn't answer questions about multi-billion dollar cuts to housing — and this rep wasn't letting him get away with it

1

Top Comments



Write a comment...



Ted Sell All I see is a horrible ignorant and disrespectful congressman... What? The congressman can't open the books and read it himself? It IS public record... He's just being ugly and showboating without any intellectual input. Maybe the good congressman can't read; it seems the Ds do send some rather ignorant people to the hill.

Like · Reply · 1 · October 25 at 6:33pm · Edited



Carl P Larson Wrong, all wrong the comments coming at me. Our Nation and it's corrupt federal government create a poor and beaten down class, which is growing. Americas Veterans have no intention of pushing anyone over the edge. To the contrary it is the former Cong... See More

Like · Reply · 10 hrs

View 1 more comment



Veterans In Politics International

October 25 at 11:00am ·

Michele Shafe & Debbie Conway to appear on the Veterans In Politics video Talk-show



Michele Shafe & Debbie Conway to appear on the Veterans In Politics video Talk-show

WEB-EXTRACT.CONSTANTCONTACT.COM



Veterans In Politics International shared Anonymous's video.

October 22 at 9:13pm ·

Chat (6)

This video may show graphic violence or gore.


[Uncover Video](#)

4,758,017 Views

Anonymous [Like Page](#)
 July 31 ·

Terrifying Video Shows Cops Put Teen in a Restraint Chair, Torture Him with a Taser.
 Credit: @PoliceThePolice

1



 **Veterans In Politics International**
 October 21 at 3:34pm ·

Michele Shafe & Debbie Conway to appear on the Veterans In Politics video Talk-show



Michele Shafe & Debbie Conway to appear on the Veterans In Politics video Talk-show
WEB-EXTRACT.CONSTANTCONTACT.COM

 **Veterans In Politics International**
 October 21 at 9:34am ·

Steve Wolfson & Reuben D'Silva to appear on the Veterans In Politics video Talk-show



[Chat \(6\)](#)

Steve Wolfson & Reuben D'Silva to appear on the Veterans In Politics video Talk-show

WEB-EXTRACT.CONSTANTCONTACT.COM



Veterans In Politics International updated their cover photo,

October 20 at 10:52pm ·

Veterans In Politics International, Inc. (TM)

To educate, organize, and awaken our veterans and their families to select, support and intelligently vote for those candidates whom would help create a better world, to protect ourselves from our own government(s) in a culture of corruption, and to be the political voice for those in other groups who do not have one.

Become a member at www.VeteransInPolitics.org



Veterans In Politics International shared Steve Sanson's post.

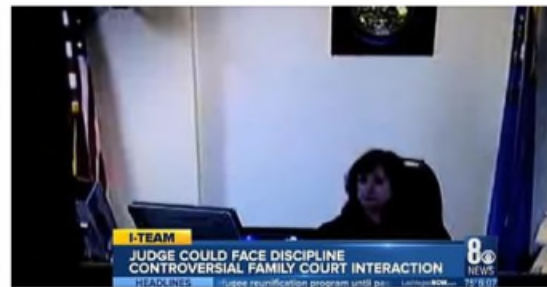
October 20 at 9:52pm ·



Steve Sanson

October 20 at 9:50pm ·

<http://www.lasvegasnow.com/.../i-team-family-court-.../841640173>



I-Team: Family court judge could face disciplinary action

Clark County Family Court Judge Rena Hughes could face disciplinary action. The Nevada Commission on Judicial Discipline filed a formal statement of...
LASVEGASNOW.COM

1

Top Comments



Write a comment...



Connie Davis FINALLY! It took a year to do something about this? That's insane!!!

Like · Reply · 2 · October 23 at 9:39am



Veterans In Politics International shared Steve Sanson's post.

October 20 at 9:23pm ·



Steve Sanson

October 20 at 9:22pm ·

I will do everything in my arsenal to make sure this type of person NEVER EVER gets elected or reelected to any Judicial Bench..



Family court judge accused of incompetence, abusing authority

Crackdown on the court as a judge who's been called a...
YOUTUBE.COM

Chat (6)

Top Comments



Write a comment...



T.C. Harvey And the hits keep coming. NEXT!

Like · Reply · 2 · October 21 at 7:03am



Doug Ansell We know who is next.

Like · Reply · 1 · October 21 at 12:44am



Veterans In Politics International shared Pamela Dee Gaudry's post.

October 18 at 8:32pm ·



11,513,800 Views

Pamela Dee Gaudry is ✈️ traveling to Atlanta airport from Hartsfield-Jackson Atlanta International Airport.

October 14 at 11:44am · Atlanta, GA ·

Follow

A complete lack of courage on my part...
As God as my witness, I promise that it will not happen again.
God bless this great country.
We need it desperately
Please share.....

Top Comments



Write a comment...



Veterans In Politics Chapter the five boroughs of New York City Very good, it's clear and I get it. I understand exactly what you mean.

Like · Reply · October 18 at 8:44pm



Veterans In Politics International

October 18 at 11:01am ·

Steve Wolfson & Reuben D'Silva to appear on the Veterans In Politics video Talk-show



Steve Wolfson & Reuben D'Silva to appear on the Veterans In Politics video Talk-show

WEB-EXTRACT.CONSTANTCONTACT.COM



Veterans In Politics International

October 16 at 9:26pm ·

Corrupt Clark County Nevada Family Court Lawyers we know who you are!

Chat (6)

In Clark County Nevada a good ethical lawyer is extremely hard to find. Several of the lawyers in Clark County appear to lack a back bone refusing to go up against other lawyers and judges when witnessing corrupt behaviors. Some of these Clark County lawyers present as back stabbers with ex-parte communication and would readily lie to you and say otherwise. We have witnessed these lawyers doing favors fo...
[Continue Reading](#)



Home - Veterans In Politics International

Home - Veterans In Politics International

1 Share



Write a comment...



Veterans In Politics International

October 16 at 9:45am ·

Veterans In Politics proudly announces Jason Mitchell II UNLV Department of Criminal Justice and Rachel Howard UNLV Criminal Justice student, both will appear as a special guests

<https://www.youtube.com/watch?v=KApnY2x3U4g>



Veterans in Politics Guests: Jason Mitchel and Rachel Howard

YOUTUBE.COM



Veterans In Politics International

October 14 at 3:35pm ·

Steve Wolfson & Reuben D'Silva to appear on the Veterans In Politics video Talk-show



Steve Wolfson & Reuben D'Silva to appear on the Veterans In Politics video Talk-show

WEB-EXTRACT.CONSTANTCONTACT.COM



Veterans In Politics International

October 14 at 9:34am ·

Chat (6)

Jason Mitchell II & Larissa Drohobyczer to appear on the Veterans In Politics video Talk-...



Jason Mitchell II & Larissa Drohobyczer to appear on the Veterans In Politics video Talk-show

WEB-EXTRACT.CONSTANTCONTACT.COM



Veterans In Politics International shared a Page.

October 14 at 12:14am ·



WAR declared on Clark County Nevada Family Court System

You are NOT alone in fighting the corruption within the Clark County Family Court System.

Like Page



Veterans In Politics International shared a link.

October 13 at 8:12am ·



Judge was unaware he gave joint custody to father accused of raping the then-12-year-old mother

A Michigan judge says he was not aware he had <a href="http://www.abajournal.com/news/article/alleged ...

ABA.JOURNAL.COM

2



Write a comment...



Veterans In Politics International

October 11 at 11:00am ·

Jason Mitchell II & Larissa Drohobyczer to appear on the Veterans In Politics video Talk-...



Jason Mitchell II & Larissa Drohobyczer to appear on the Veterans In Politics video Talk-show

WEB-EXTRACT.CONSTANTCONTACT.COM

Chat (6)



 **Veterans In Politics International** shared **Teamsters for Trump's** video.
October 10 at 10:15pm ·

-3:30

1,878,314 Views

Teamsters for Trump
October 5 at 5:54pm · Like Page

The people that brought you a not guilty verdict for Hillary are now bringing mass murder to a town near you. Grab it before it's a memory.

 **Veterans In Politics International** shared **Steve Sanson's** post.
October 9 at 10:47am ·

 **Steve Sanson**
October 9 at 9:33am ·

All you corrupt lawyers in Clark County Family Court that use your influence, by way of friendship, status in the community and money. We are coming after You!

 **Veterans In Politics International** shared **Steve Sanson's** post.
October 8 at 1:30pm ·



Steve Sanson is with Mantis Toboggan and Jim Jonas at **World Wide Digital Broadcasting**.
October 8 at 1:27pm · Las Vegas ·

The NEW Veterans In Politics video internet Talk Show group, Mantis Toboggan, Jim Jonas, Christina Critz, Brittany Nicole, Steve Sanson on World Wide Digital Br...
[See More](#)

 **Veterans In Politics International**
October 8 at 1:18pm ·

Danny Tarkanian candidate for US Senate, James Dean Leavitt candidate for Las Vegas Justice of the Peace Department 1 and Christina Gruber a victim of the Las Vegas Mass Shooting on the Veterans In Politics talk show.
<https://www.youtube.com/watch?v=C080pfdE7K0&feature=youtu.be>

Chat (6)



Veterans in Politics 10-07-17 Guests:
James Dean Leavitt, Danny Tarkanian,
Christina Gruber

YOUTUBE.COM

1 Share



Write a comment...



Veterans In Politics International shared a link.

October 8 at 9:22am ·



Montana mayoral candidate needs
only 1 vote — his — to win

The Bozeman Daily Chronicle reports Glen Clements
was the only person to apply to be a write-in candidate
for the position on the November ballot. Under
Montana law, any other write-in votes won't be...

M.LASVEGASSUN.COM



Veterans In Politics International shared Veteran Pride's
photo.

October 7 at 7:28pm ·

Steve Sanson



Veteran Pride

September 25 ·

Like Page

Still available!!!

Order Your Here <https://goo.gl/9QUcVo>

Perfect gift for you or a loved one!



Veterans In Politics International

October 7 at 3:36pm ·

Jason Mitchell II & Larissa Drohobyczer to appear on the Veterans In Politics
video Talk...



Chat (6)



Jason Mitchell II & Larissa Drohobyczer to appear on the Veterans In Politics video Talk-show

WEB-EXTRACT.CONSTANTCONTACT.COM

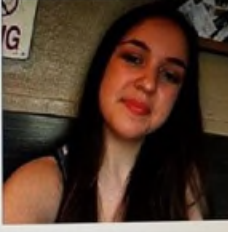


Veterans In Politics International

October 7 at 9:34am ·

James Dean Leavitt & Danny Tarkanian to appear on the Veterans In Politics video Talk-show

NIC #	M454114940
Last Name	Kelly
First Name	Shakelle
Nickname	
Alias	
Age	14
Gender	Female
Height	5'5"
Weight	120
Eyes	Brown
Hair	Brown
Complexion	
Race	White
Birth Date	03/05/2003



James Dean Leavitt & Danny Tarkanian to appear on the Veterans In Politics video Talk-show

WEB-EXTRACT.CONSTANTCONTACT.COM

1



Write a comment...



Veterans In Politics International

October 7 at 1:41am ·

Aimee Jones Family Court Corruption Interview with Steve Sanson

<https://vimeo.com/236166753/8d467df5df>



STEVE SANSON - PRESIDENT OF VETERANS IN POLITICS

09.29.17 - Real Chamber - Aimee Jones interview

This is "09.29.17 - Real Chamber - Aimee Jones interview" by 360Daily.net on Vimeo, the home for high quality videos and the people who love them.

VIMEO.COM

2



Write a comment...



Veterans In Politics International shared Steve Sanson's post.

October 6 at 12:55pm ·

Chat (6)



Steve Sanson

October 6 at 12:50pm · Las Vegas ·

Our New co-host Brittany Nicole:

Brittany Nicole is an educator and passionate about teaching, justice, equality and politics. Brittany's late grandfather a US ...

[See More](#)

3

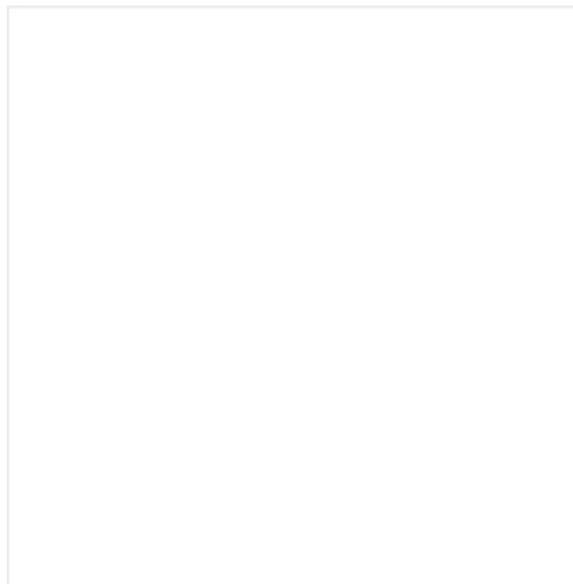


Write a comment...

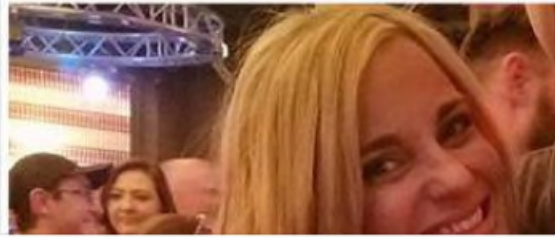


Veterans In Politics International shared Steve Sanson's post.

October 6 at 11:31am ·



Chat (6)



Steve Sanson is with Christina Gruber.
October 6 at 11:30am ·

Christina Gruber a victim from the Las Vegas Strip Mass Shooting will be a Special Guest on the Veterans In Politics internet video talk show on Saturday October 7th from 2 to 3:15PM.

Listen Live:

<http://www.wvdbtv.com/veterans-in-politics.html>

2



Write a comment...



Veterans In Politics International shared a link.

October 6 at 10:31am ·



All 58 names of shooting victims released by Clark County

Clark County released the names Thursday of the 58 victims who died in Sunday's massacre at the Route 91 Harvest Festival.

FOXVEGAS.COM

1



Write a comment...



Veterans In Politics International

October 6 at 9:48am ·

Jobs for Veterans in the Los Angeles Area:

We are looking to hire veterans to work with us on our construction sites in Los Angeles.

From laborers to framers to plumbers and supervisors. We would appreciate if you would call your L.A. contacts and have them contact us. It is important to us to see that our veterans have jobs and job training.... [See More](#)



Veterans In Politics International shared Steve Sanson's post.

October 5 at 8:09am ·

Chat (6)



Steve Sanson is 🍷 drinking with friends with Christina Gruber and Steve Sanson at Stoney's Rockin Country.
October 4 at 7:57pm · Las Vegas ·

At Stoney's Country Bar for the Solidarity Concert to celebrate the survivors of the Las Vegas Mass Shooting. I am honored to stand with Christina GRUBER who was shot on that horrible night.



Veterans In Politics International

October 4 at 11:00am ·

James Dean Leavitt & Danny Tarkanian to appear on the Veterans In Politics video Talk-show



James Dean Leavitt & Danny Tarkanian to appear on the Veterans In Politics video Talk-show

MYEMAIL.CONSTANTCONTACT.COM



Veterans In Politics International

October 4 at 10:41am ·

What do you think?

Chat (6)

Listen Browse Feeds Top Feeds New Feeds Official Feeds Alert Feeds Archives

Public Safety Audible Bot Another Radio More Other

Clark County Nevada Live Audio Feeds

JS > Nevada > Clark (County) [Las Vegas-Henderson]

Experience Audible Today Transform your commute, workout, shores with audiobooks from Audible

Incidents Displayed Below Provided by Incident Page Network

Incident	Description
REPORTING OFFICER: (PARADISE -) HIGHLIGHT 23436	(PARADISE -) UPDATE: ONE SUSPECT NEUTRALIZED AT MANDALAY BAY, 32ND FLOOR, POSS SECOND SUSPECT INSIDE, EVACUATING HOTEL [REV777]
REPORTING OFFICER: (PARADISE -) HIGHLIGHT 23436	METRO ON SCENE DEVICE IN AN ACURA SUV AT

Veterans In Politics International
October 3 at 4:29pm ·

<https://vimeo.com/236166753/8d467df5df>



STEVE SANSON - PRESIDENT OF VETERANS IN POLITICS

09.29.17 - Real Chamber - Aimee Jones interview


This is "09.29.17 - Real Chamber - Aimee Jones interview" by 360Daily.net on Vimeo, the home for high quality videos and the people who love them.

VIMEO.COM

Veterans In Politics International
October 3 at 9:00am ·

Our city has faced a tragic moment in American history. The mass shooting on the Las Vegas Strip has put a damper on the way we move forward in life. We are terrified that this cowardly act has merged its head. We would like to recognize the act of heroism amongst many Americans that were involved. We pray for all that lost their lives and the many that have been harmed both physically and mentally.

Because of this we will postpone our Family Court Town Hall Educational Fo ... [See More](#)



Home - Veterans In Politics International

Home - Veterans In Politics International

1

Chat (6)



Write a comment...



Veterans In Politics International

October 2 at 10:00am ·

Have you checked this out?



Free Speech under Attack

MYEMAIL.CONSTANTCONTACT.COM



Veterans In Politics International

October 2 at 1:52am ·

Clark County Sheriff Joe Lombardo just reported the shots came from the 32nd floor of the Mandalay Bay onto pedestrian into the concert goes from an automatic weapon. 20 people plus are dead, over 100 plus injured, several off duty police officers have been shot and killed.



Veterans In Politics International shared 360Daily.net's video.

October 1 at 5:41pm ·



5,154 Views

360Daily.net
September 15 ·

Like Page

Chat (6)

STEVE SANSON HOLDS A PROTEST OUTSIDE FAMILY COURT AND RESPONDS TO JUDGE DUCKWORTH [Steve Sanson](#)



Veterans In Politics International

October 1 at 5:41pm ·

Veterans In Politics proudly announces Sarah Gazala candidate for US Senate 2018. Phillip Paleracio will discuss the corruption within the Nevada State Bar; Special Guest Lee Hawkins & Sarah Hawkins looking for his missing 14 year old granddaughter/daughter all will appear as a special guests on the Veterans In Politics internet video talk-show Saturday September 30, 2017.

Sanson rants about NFL Players taking a knee during the National Anthem ... [See More](#)



Veterans in Politics 09-30-17 Guests: Sarah Gazala, Lee Hawkins, Sarah Hawkins, Phillip Paleracio

[YOUTUBE.COM](#)



Veterans In Politics International shared [360Daily.net's](#) video.

October 1 at 5:39pm ·



5,154 Views

[360Daily.net](#)
September 15 ·

[Like Page](#)

STEVE SANSON HOLDS A PROTEST OUTSIDE FAMILY COURT AND RESPONDS TO JUDGE DUCKWORTH [Steve Sanson](#)

1



Write a comment...



Veterans In Politics International updated their cover photo.

September 30 at 6:29pm ·





 **Veterans In Politics International**
September 30 at 3:35pm ·

James Dean Leavitt & Danny Tarkanian to appear on the Veterans In Politics video Talk-show



James Dean Leavitt & Danny Tarkanian to appear on the Veterans In Politics video Talk-show

MYEMAIL.CONSTANTCONTACT.COM

 **Veterans In Politics International**
September 30 at 9:30am ·

Sarah Gazala & Phillip Paleracio to appear on the Veterans In Politics video Talk-show



Sarah Gazala & Phillip Paleracio to appear on the Veterans In Politics video Talk-show

MYEMAIL.CONSTANTCONTACT.COM

 **Veterans In Politics International** shared 360Daily.net's video.
September 28 at 5:51pm ·

Steve Sanson "You don't protest against our country and the Veterans that shed their blood for you by taking a F*** knee during our National Anthem."



STEVE SANSON PRESIDENT OF VETERANS IN POLITICS U.S. MARINE, RETIRED 360 DAILY.NET LAS VEGAS

4,001 Views

Chat (6)

360Daily.net
September 28 at 5:04pm · Like Page


Steve Sanson "You don't protest against our country and the Veterans that shed their blood for you by taking a F*** knee during our National Anthem."

1

 Write a comment...

Veterans In Politics International
September 28 at 10:02am ·

Have you seen our latest news?



Bias and Attack on First Amendment Rights on Full Display!

MYEMAIL.CONSTANTCONTACT.COM

Veterans In Politics International
September 27 ·

Sarah Gazala & Phillip Paleracio to appear on the Veterans In Politics video Talk-show



Sarah Gazala & Phillip Paleracio to appear on the Veterans In Politics video Talk-show

MYEMAIL.CONSTANTCONTACT.COM

1

 Write a comment...

Veterans In Politics International
September 25 ·

<http://www.fox5vegas.com/.../study-nevada-has-one-of-the-high...>



Study: Nevada has one of the highest veteran suicide rates

Newly released data from the Department of Veterans Affairs shows that in 2014, the most recent year on file, 127 Nevada veterans committed suicide.

FOX5VEGAS.COM

Veterans In Politics International
September 25 ·

Veterans In Politics proudly announces that Jasmine Flower Boum discussing the Parental Alienation by Clerk Cheryl District Court Judge

Family Division Rena Hughes will appear as a special guests on the Veterans In Politics internet video talk-show

Cindy Lake Special Co-Host



Veterans in Politics 09-23-17 Guests: Jasmine Flower Bourn

YOUTUBE.COM

1



Write a comment...



Veterans In Politics International

September 25 ·

Judge Milks the System; the AWOL Life of Mathew Harter



Judge Milks the System; the AWOL Life of Mathew Harter

MYEMAIL.CONSTANTCONTACT.COM

1



Write a comment...



Veterans In Politics International

September 25 ·

Have you seen our latest news?



Free Speech under Attack

MYEMAIL.CONSTANTCONTACT.COM



Veterans In Politics International shared a link.

September 24 ·



Chat (6)



Heller turned against Nevadans by backing Senate's health bill

The Senate's last-ditch assault on the Affordable Care Act appeared to be all but dead heading into the weekend, but Nevadans are going to remember it even if it...

M.LASVEGASSUN.COM

2

[Top Comments](#)



Write a comment...



Jetaway John Nice Editorial!

[Like](#) · [Reply](#) · September 24 at 6:23pm



Veterans In Politics International shared a link.

September 24 ·



Veterans in Politics 09-23-17 Guests: Jasmine Flower Bourn

YOUTUBE.COM



Veterans In Politics International

September 23 ·

Sarah Gazala & Phillip Paleracio to appear on the Veterans In Politics video Talk-show



Sarah Gazala & Phillip Paleracio to appear on the Veterans In Politics video Talk-show

MYEMAIL.CONSTANTCONTACT.COM



Veterans In Politics International shared a link.

September 23 ·



lasvegastribune.net

Chat (6)

JVA001221

LASVEGASTRIBUNE.NET

1



Write a comment...



Veterans In Politics International

September 23 ·

Jasmine Flower Bourn to appear on the Veterans In Politics video Talk-show



Jasmine Flower Bourn to appear on the Veterans In Politics video Talk-show

MYEMAIL.CONSTANTCONTACT.COM



Veterans In Politics International

September 22 ·

Judge Milks the System; the AWOL Life of Mathew Harter



Judge Milks the System; the AWOL Life of Mathew Harter

MYEMAIL.CONSTANTCONTACT.COM

1

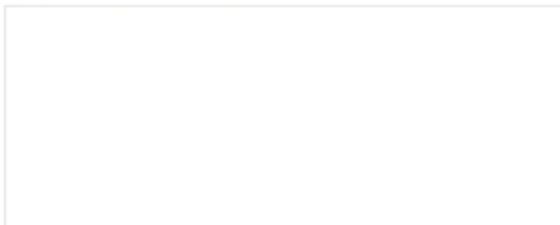


Write a comment...



Veterans In Politics International

September 20 ·



Chat (6)

JVA001222

Former Congresswoman Shelley Berkley
 Congressman Ruben Kihuen
 Sheriff Joe Lombardo
 Nevada Speaker of the Assembly Jason Frierson
 Joseph W. Brown
 Former Nevada Speaker of the Assembly Barbara Buckley

Mr. Las Vegas, Wayne Newton

Invite you to join them for the

CAMPAIGN KICK-OFF

for

Steve WOLFSON
 District Attorney



EMCEE, THE HONORABLE JUDGE JACKIE GLASS (RET.)

When:


 **Veterans In Politics International**
 September 20 ·

Jasmine Flower Bourn to appear on the Veterans In Politics video Talk-show




Jasmine Flower Bourn to appear on the Veterans In Politics video Talk-show

MYEMAIL.CONSTANTCONTACT.COM


 **Veterans In Politics International**
 September 20 ·

Have you checked this out?



Bias and Attack on First Amendment Rights on Full Display!

MYEMAIL.CONSTANTCONTACT.COM

 **Veterans In Politics International**
 September 19 ·

We just had a meeting with Senator Heller in his DC office discussing the Family Court corruption

[Chat \(6\)](#)



1



Write a comment...



Veterans In Politics International

September 18 ·

Judge Milks the System; the AWOL Life of Mathew Harter



Judge Milks the System; the AWOL Life of Mathew Harter

MYEMAIL.CONSTANTCONTACT.COM

2

2 Shares



Write a comment...



Veterans In Politics International

September 18 ·

Check out our most recent newsletter!



conta.cc

MYEMAIL.CONSTANTCONTACT.COM



Veterans In Politics International

September 17 ·

Chat (6)

JVA001224

Veterans In Politics proudly announces Karen Fraser will discuss how the Canadian Family Court apprehends and illegally adopts children and Ryan LeCompte MA, OIF/OEF Infantry Marine and the founder and Executive Director of Veterans for Entheogenic Therapy (VET) Inc., both will appear as a special guests on the Veterans In Politics internet video talk-show

Sanson's response to Jane Ann Morrison commentator for the Las Vegas Review Journal



Veterans in Politics 09-16-17 Guests: Karen Fraser and Ryan LeCompte

YOUTUBE.COM

2



Write a comment...



Veterans In Politics International

September 17 ·

Check out our most recent newsletter!



conta.cc

MYEMAIL.CONSTANTCONTACT.COM



Veterans In Politics International

September 16 ·

Jasmine Flower Bourn to appear on the Veterans In Politics video Talk-show



Jasmine Flower Bourn to appear on the Veterans In Politics video Talk-show

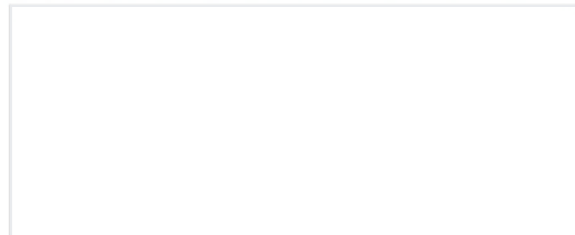
MYEMAIL.CONSTANTCONTACT.COM



Veterans In Politics International

September 16 ·

Karen Fraser & Ryan LeCompte to appear on the Veterans In Politics video Talk-show



Chat (6)

Karen Fraser & Ryan LeCompte to appear on the Veterans In Politics video Talk-show

MYEMAIL.CONSTANTCONTACT.COM

1



Write a comment...



Veterans In Politics International shared 360Daily.net's video.

September 16 ·

-3:25

5,154 Views

360Daily.net

September 15 ·

Like Page

STEVE SANSON HOLDS A PROTEST OUTSIDE FAMILY COURT AND RESPONDS TO JUDGE DUCKWORTH [Steve Sanson](#)

1



Write a comment...

See More

Chat (6)

JVA001226

EXHIBIT 5

EXHIBIT 5

Like 17 Share Share:
Tweet

-
-
-
-



Steve Wolfson & Reuben D'Silva to appear on the Veterans In Politics video talk-show

Call into the show (702) 685-8380



Steve Wolfson Clark County
District Attorney



Reuben D'Silva candidate
for Congressional District 1
also a US Marine

Veterans In Politics proudly announces that **Steve Wolfson** Clark County District Attorney and **Reuben D'Silva** candidate for Congressional District 1 also a US Marine, both will

appear as a special guests on the Veterans In Politics internet video talk-show **Saturday October 21, 2017.**

FIND OUT MORE

Listen to the **Veterans In Politics** Talk-Show every Saturday from 14:00-15:00 (2:00pm-3:00pm PT) on **World Wide Digital Broadcasting Corp.**



The **VIP Talk-Show** is a trusted source of information. For more than a decade, **Steve Sanson**, **Jim Jonas** and co-hosts **Brittany Nicole**, **Mantis Toboggan** and guest co-host **Christina Ortiz** have informed the listeners about important local and national issues. Not only do they discuss major national issues, but they also bring public's attention to multiple local issues affecting our community that other news sources choose to ignore. Past guests are politicians, candidates running for public office, organization leaders, published authors, business owners and citizens. **VIP's** involvement in local affairs has led to investigations of multiple government agencies and corrupt individuals. **VIP** received special recognition and multiple awards from government officials and non-profit organizations.

If you would like to be a guest on our show, please call or e-mail us.

Contact Us at 702 283 8088

JVA001229

Show Archive on World Wide
Degital Broadcast

We are proud to announce that
our website familycourtwar.com
is now live.

**We are glade that we are not the only ones that see a major problem
within the Clark County Family Court System:**



Click & Read order Reversed and Remained below:

**[Clark County Family Court Judge Jennifer Elliott was taken to
the judicial woodshed by the Nevada State Appellate Court.](#)**

**[Nevada Attorney Scott Holper is suspended from practicing
law!](#)**

Nevada Supreme Court finally suspends Holper

By Rolando Larraz
Las Vegas Tribune
Part eleven of a series

At the bottom of its stationery, the Nevada Supreme Court has a quote that partially states: "The Nevada Judiciary has the responsibility to provide impartial, efficient, and accessible dispute resolution in legal matters," and we are now wondering who they are trying to impress... or fool.

Last week, way long expected confirmation of the suspension of Attorney Scott Holper was more



SCOTT HOLPER

than a laugh; it was an insult to the people of Nevada.

After over nine months of waiting and ten weeks of Las Vegas Tribune's writing on that matter, the Supreme Court finally confirmed the suspension of Holper with a slap to the face of the honest people of Nevada, making that suspension for only ninety days, despite all the charges Holper agreed to in his plea agreement.

In the plea agreement, Holper admitted to one or more violations of the following Rules of Profes-

sional Conduct: 1.1 (competence), 1.4 (communication), and 3.1 (meritorious claims and contentions) by (a) filing a complaint on behalf of a client alleging a cause of action knowing that the statute of limitations had expired and the defendant was not liable, and (b) not communicating with the client regarding the status of her case; 1.3 (diligence) by failing to diligently pursue a case; 1.6 (confidentiality of information) by allowing privileged information to be shown to a
(See Holper, Page 3)

FROM THE DESK OF GORDON MARTINES

Family Court Litigants Corner



All of you corrupt lawyers in Clark County Family Court that uses your influence, by way of friendship, status in the community and money to influence judges. We are coming after you!

Apparently Judge Bryce Duckworth cannot relate to litigants in Family Court:



Family Court Judge Bryce Duckworth said we only look for disgruntled litigants. Who wouldn't be disgruntled when you take their children? I wonder how he would be if his children was taken away?

Disabled Vet Educates Voters and Gets Slammed By MSM



[Click onto link below:](#)

<https://www.bitchute.com/video/D0k1LCd4smA/>

Should the word "GOD" hang over the bench of a Family Court Judge?



We are a firm believer in God. Do we not have laws that separate Church from State? Should we have the words "In God We Trust" in a Family courtroom hanging above a judge's bench? Family Court Judge Mathew Harter is the only Judge so far that has this sign hanging above his bench. Is this appropriate? If your belief is any other religion that does not have the word "God" in it would you feel comfortable in that courtroom? We are not debating the word "God" being used, but we don't feel God should be used in a courtroom that has divorces and the removal of children from loving parents. Is this God will?

War Declared On the Clark County Family Court System

Nevada's Secret Court's



He Defended Us, Let's Defend Him!



To learn more click [here](#)

[Listen & Watch the Interview of Last Week's Show:](#)

[LIVE every Saturday from 2-3PM Pacific Time.](#)

JVA001234

Veterans In Politics proudly announces that James Dean Leavitt candidate for Las Vegas Justice of the Peace Department 1, Danny Tarkanian candidate for United States Senate Representing Nevada and Christina Gruber a victim from the Las Vegas Strip Mass Shooting

(Click onto the video below)





Please contribute to Veterans In Politics in an effort in helping us to continue our mission by Exposing Corruption, Champion Veterans Rights, and Educating the public on candidates running for elected office: go to www.veteransinpolitics.org and click onto our PayPal Page or at our PO Box 28211/ Las Vegas, NV. 89126





HELP Nevada Families!

We Are A Government Watchdog!

When we see something wrong we speak up! We need your help to fix major problems in our family courts.

- Judges ordering veterans to use their disability benefits to pay spousal support in violation of federal and state laws.
- Judges ordering parents to pay for overpriced therapists– who cost multiple times what they should cost, and then hold children hostage until the bill is paid.
- Judges contacting lawyers with open cases in front of them and asking for up to \$10,000 in campaign contributions, failing to “avoid the appearance of impropriety” as required by their ethics obligations.
- Judicial conflicts of interests and constitutional rights violations abound.

And that’s just the “short list!”



Nevada was rated the fifth most corrupt state in the nation. Get involved! Become a Court Observer, join our protests and help us fix these abuses against Nevada families.

Call: Steve Sanson at 702-283-8088

Email: vipipresident@cs.com

Go to our website, donate: veteransinpolitics.org or familycourtwar.com

Like and follow us on Facebook:
War Declared On Clark County Family Court System

Your News
YOUR WORLD, YOUR VOICE

NEWS

Latest news

**Click Here
For Today's News**

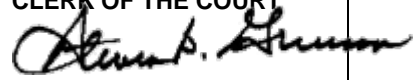
Get YOURNEWS here

49.	Reply to Oppositions to Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program or, Alternatively, to a District Court Judge Outside of Clark County	2/23/2018	JVA001471 - JVA001539
41.	Reply to Plaintiff's Opposition to an Award of Attorney's fees, Costs, and Statutory Sanctions	1/24/2018	JVA001260 - JVA001265
46.	Reply to Plaintiffs' Opposition to Motion for Attorney Fees and Costs Pursuant to Nev. Rev. Stat. 41.670	2/5/2018	JVA001398 - JVA001451
66.	Reply to Plaintiffs' Opposition to Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order and Opposition to Countermotion for Attorney's Fees	5/18/2018	JVA001718 - JVA001731
55.	Reply to Plaintiffs' Opposition to "Motion to Reconsider March 2, 2018 Minute Order granting Plaintiffs' Motion to Disqualify" and Countermotion and Attorney's Fees	4/10/2018	JVA001633 - JVA001663
25.	Reply to Plaintiffs' Opposition to Motion to Strike and Opposition to Plaintiffs' Countermotion for Attorney's Fees	5/30/2017	JVA000809 - JVA000817
35.	Schneider Defendants' Motion for Statutory Damages ad Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670; and Motion for Sanction	9/12/2017	JVA001005 - JVA001013
18.	Schneider Defendants' Special Motion to Dismiss Plaintiffs' Slapp Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670	3/28/2017	JVA000337 - JVA000367
19.	Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp)	3/28/2017	JVA000368 - JVA000405
81.	Stipulation and Order to Dismiss with Prejudice All Claims Against Hanusa Parties	10/13/2017	JVA001754 - JVA001756

30.	Transcript Re: All Pending Motions	7/5/2017	JVA000884 - JVA000950
26.	VIPI Defendants' Omnibus Reply to: (1) Plaintiffs' Opposition to Special motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and (2) Plaintiffs' Opposition to Motion to Dismiss and Countermotion for Attorneys' Fees	5/30/2017	JVA000818 - JVA000859
29.	VIPI Defendants' Supplement to VIPI Defendants' Omnibus Reply to: (1) Plaintiffs' Opposition to Special motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and (2) Plaintiffs' Opposition to Motion to Dismiss and Countermotion for Attorneys' Fees	6/9/2017	JVA000867 - JVA000883

40

40



1 **OPPM**
DENNIS L. KENNEDY (Nevada Bar No. 1462)
2 JOSHUA P. GILMORE (Nevada Bar No. 11576)
BAILEY ❖ KENNEDY
3 8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148-1302
4 Telephone: 702.562.8820
Facsimile: 702.562.8821
5 DKennedy@BaileyKennedy.com
JGilmore@BaileyKennedy.com

6
7 JENNIFER V. ABRAMS (Nevada Bar No. 7575)
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Ste. 100
8 Las Vegas, Nevada 89118
Telephone: 702.222.4021
9 Facsimile: 702.248.9750
JVAGroup@theabramslawfirm.com

10
11 MARSHAL S. WILICK (Nevada Bar No. 2515)
WILICK LAW GROUP
3591 E. Bonanza Road
12 Las Vegas, Nevada 89110
Telephone: 702.438.4100
13 Facsimile: 702.438.5311
Marshal@willicklawgroup.com

14 *Attorneys for Plaintiffs*
15 Jennifer V. Abrams and The Abrams & Mayo Law
Firm

16 DISTRICT COURT

17 CLARK COUNTY, NEVADA

18 JENNIFER V. ABRAMS and THE ABRAMS &
19 MAYO LAW FIRM,

20 Plaintiffs,

21 vs.

22 LOUIS C. SCHNEIDER; LAW OFFICES OF
LOUIS C. SCHNEIDER, LLC; STEVE W.
23 SANSON; HEIDI J. HANUSA; CHRISTINA
ORTIZ; JOHNNY SPICER; DON
24 WOOLBRIGHT; VETERANS IN POLITICS
INTERNATIONAL, INC; SANSON
25 CORPORATION; KAREN STEELMON; and
DOES I through X,

26 Defendants.
27
28

Case No. A-17-749318-C
Dept. No. XII

**PLAINTIFFS' OMNIBUS OPPOSITION
TO DEFENDANTS' MOTIONS FOR
ATTORNEY'S FEES, COSTS, AND
SANCTIONS**

Date of Hearing: Dec. 11, 2017
Time of Hearing: 8:30 A.M.

BAILEY ❖ KENNEDY
8984 SPANISH RIDGE AVENUE
LAS VEGAS, NEVADA 89148-1302
702.562.8820

1 The Abrams Parties oppose the Motions for Attorney’s Fees, Costs, and Sanctions filed by
2 the VIPI Defendants and the Schneider Defendants. If the Court does not deny each Motion
3 “altogether” due to the “outrageously unreasonable” nature of the amounts requested, it should make
4 several reductions in order to ensure that the final awards are “reasonable” and do not unfairly result
5 in a financial “windfall” for the Defendants. *Christian Research Inst. v. Alnor*, 81 Cal. Rptr. 3d 866,
6 870-71 (Cal. Ct. App. 2008).¹ Specifically, the Court should award no more than \$33,801.83 in
7 attorney’s fees and costs to the VIPI Defendants and no more than \$6,727.50 in attorney’s fees to the
8 Schneider Defendants.² Moreover, because the Abrams Parties’ claims were neither frivolous nor
9 vexatious, none of the Defendants is entitled to statutory sanctions in the amount of \$10,000.00.³

10 This Opposition is made and based on the papers and pleadings on file, the following
11 Memorandum of Points and Authorities and exhibits attached thereto, and any oral argument heard
12 by the Court.

13 DATED this 27th day of October, 2017.

14 BAILEY ❖ KENNEDY

15 By: /s/ Joshua P. Gilmore
16 DENNIS L. KENNEDY
17 JOSHUA P. GILMORE

18 AND
19 JENNIFER V. ABRAMS
20 THE ABRAMS & MAYO LAW FIRM
21 6252 South Rainbow Blvd., Ste. 100
22 Las Vegas, NV 89118

23 MARSHAL S. WILLICK
24 WILLICK LAW GROUP
25 3591 E. Bonanza Road
26 Las Vegas, NV 89110

27 *Attorneys for Plaintiffs*
28 Jennifer V. Abrams and The Abrams &
Mayo Law Firm

26 ¹ The Nevada Supreme Court consults California law for guidance in interpreting and applying Nevada’s anti-
27 SLAPP law. NRS 41.665(2); *Delucchi v. Songer*, 133 Nev., Adv. Op. 42, 396 P.3d 826, 832-33 (2017).
28 ² The Schneider Defendants did not request costs. The time has now passed for them to do so.
³ Nor are the Schneider Defendants entitled to sanctions pursuant to the Court’s inherent authority.

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

The instant Motions feel more like “an attempted bank robbery” than “a genuine effort to recover a reasonable fee bill.”⁴ The VIPI Defendants seek \$95,607.18 in attorney’s fees and costs and \$20,000.00 in statutory sanctions; the Schneider Defendants seek \$80,495.00 in attorney’s fees, \$20,000.00 in statutory sanctions, and \$80,495.00 in additional sanctions. In the aggregate, the Defendants seek a whopping \$296,597.18! The amount sought is patently unreasonable; ***according to the California Supreme Court, the fact that the Defendants had the audacity to request such an absurd amount permits the Court to deny their Motions “altogether.”***⁵

Assuming (*arguendo*) that the Court considers the Motions, it must make several adjustments when calculating the “lodestar” in order to ensure that the awards are “reasonable” as required by NRS 41.670(1)(a). First, the Court should reduce the hourly rates requested in calculating attorney’s fees. Second, the Court should exclude time unrelated to the anti-SLAPP motions (and related 12(b)(5) motions) and instant Motions. Finally, the Court should make across-the-board reductions to the remaining hours claimed in order to account for excessive, unnecessary, and duplicative work; block-billing; and vague and non-descriptive time entries.

The Court should further decline to sanction the Abrams Parties, whether pursuant to NRS 41.670(1)(b) or its inherent authority, because none of the Defendants proved that the Abrams Parties’ claims were frivolous or vexatious. Although the Court determined in its July 24, 2017 Order that the Abrams Parties did not establish a “probability of success” on their defamation and related claims against the VIPI Defendants,⁶ the Court did *not* find that the Abrams Parties lacked any basis for asserting their claims in the first instance (or that they filed them without conducting a reasonable inquiry). That aside, the Defendants’ actions, even if immune from suit (a matter to be resolved on appeal), do not warrant the issuance of sanctions in their favor.

⁴ *Young v. Smith*, No. 3:07-CV-00854, 2017 WL 3892057, at *1 (M.D. Pa. Sept. 6, 2017).

⁵ *See Ketchum v. Moses*, 17 P.3d 735, 745 (Cal. 2001) (noting that a trial court may deny “altogether” an unreasonable request for attorney’s fees and costs made by a defendant who prevailed on an anti-SLAPP motion). As discussed below, the Court should also deny the Schneider Defendants’ Motion due to the lack of supporting documentation (e.g., billing invoices). N.R.C.P. 54(d)(2)(B).

⁶ A formal Order has not been entered granting the Schneider Defendants’ anti-SLAPP motion.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

II. ARGUMENT

A. Standard of Decision for Awarding Attorney’s Fees and Costs to a Defendant Who Prevails on an Anti-SLAPP Motion.

The Court “shall award reasonable costs and attorney’s fees” to a defendant who prevails on an anti-SLAPP motion.⁷ NRS 41.670(1)(a). The statute is clear: The award must be “*reasonable*.”

The trial court cannot be placed in the position of having to acquiesce in any amount sought by a prevailing defendant, no matter how outrageous. *The trial court’s role is not merely to rubber stamp the defendant’s request*, but to ascertain whether the amount sought is reasonable.

Robertson v. Rodriguez, 42 Cal. Rptr. 2d 464, 472 (Cal Ct. App. 1995) (emphasis added); *see also Christian Research Inst.*, 81 Cal. Rptr. 3d at 871 (stating that a trial court does not “simply award the sum requested” because the award is not intended to serve as a financial “windfall” to the defendant). *In fact, the Court may “deny an unreasonable fee altogether” if it appears that the amount sought is excessive or inflated.* *Ketchum*, 17 P.3d at 745 (emphasis added); *see also Jadwin v. Cty. of Kern*, 767 F. Supp. 2d 1069, 1100 (E.D. Cal. 2011) (“Courts may reduce a requested fee award, or deny one altogether, where a fee request appears unreasonably inflated.”).

A party seeking to recover fees and costs for dismissal of a SLAPP has the burden of demonstrating that the amount sought is reasonable. *See, e.g., 569 E. Cty. Blvd. LLC v. Backcountry Against the Dump, Inc.*, 212 Cal. Rptr. 3d 304, 310 (Cal. Ct. App. 2016); *see also Carson v. Billings Police Dep’t*, 470 F.3d 889, 891 (9th Cir.2006) (“When a party seeks an award of attorneys’ fees, that party bears the burden of submitting evidence of the hours worked and the rate paid.”). This means that the moving party must submit “a detailed invoice of the billings, along with affidavits and memorandums.” *Barney v. Mt. Rose Heating & Air*, 124 Nev. 821, 829, 192 P.3d 730, 736 (2008); *see also* N.R.C.P. 54(d)(2)(B) (noting that a motion for attorney’s fees shall include “documentation concerning the amount of fees claimed”).⁸

⁷ The law is the same in California. *See* CAL. CIV. PROC. CODE § 425.16(c) (“[A] prevailing defendant on a special motion to strike shall be entitled to recover his or her attorney’s fees and costs.”).

⁸ A party who seeks fees authorized by statute must still comply with N.R.C.P. 54(d). *See J & J Sports Prods., Inc. v. Bonito Michoacan, Inc.*, No. 2:12-CV-01519-RCJ, 2013 WL 5234262, at *7 (D. Nev. Sept. 16, 2013).

1 Billing invoices are necessary “to establish that the number of hours . . . requested are
2 reasonable.” *Gonzalez v. City of Maywood*, 729 F.3d 1196, 1202 (9th Cir. 2013); *see also Ketchum*,
3 17 P.3d at 741 (noting that trial courts must “carefully review attorney documentation of hours
4 expended” in order to identify and exclude inefficient or duplicative time entries and non-
5 recoverable time entries). ***The Nevada Supreme Court has held that a party who fails to***
6 ***substantiate a motion for attorney’s fees and costs with supporting documentation risks having its***
7 ***motion denied in its entirety.***⁹ Compare *Moreno v. Richmond Am. Homes of Nevada, Inc.*, No.
8 65714, 2015 WL 9464437, at *2 (Nev. Dec. 18, 2015) (affirming the district court’s order denying a
9 motion for attorney’s fees and costs “due to the lack of supporting documentation”), with *Kwist v.*
10 *Chang*, No. 53545, 2011 WL 1225692, at *4 (Nev. Mar. 31, 2011) (affirming an award of attorney’s
11 fees and costs “based on a motion with substantial supporting documentation”).

12 The Court also considers the *Brunzell*¹⁰ factors in determining whether the amount sought in
13 attorney’s fees and costs is reasonable. *Shuette v. Beazer Homes Holdings Corp.*, 121 Nev. 837,
14 865, 124 P.3d 530, 549 (2005) *see also Harvey v. United Pac. Ins. Co.*, 109 Nev. 621, 624, 856 P.2d
15 240, 241 (1993) (indicating that the factors listed under Nevada Rule of Professional Conduct 1.5(a)
16 should “be considered in determining reasonableness”).

17 **B. The VIPI Defendants Seek an Unreasonable Amount of Attorney’s Fees.**

18 The VIPI Defendants seek an award of attorney’s fees using the “lodestar” methodology.
19 (VIPI Mot., 7:23 – 8:9.) As set forth below, in calculating a reasonable attorney’s fee, the Court
20 should reduce the rates requested; exclude time for work that is not recoverable (e.g., time unrelated
21 to the motions to dismiss and time associated with clerical or secretarial tasks); and make an across-
22 the-board reduction to the remaining hours claimed due to unreasonable billing practices. Upon
23 making such reasonable adjustments, the Court should find that the VIPI Defendants are entitled to
24 no more than \$31,047.50 in reasonable attorney’s fees, summarized as follows:

25 ⁹ Courts elsewhere agree that a party must substantiate a motion for attorney’s fees and costs. *See, e.g.,*
26 *Kingvision Pay-Per-View, Ltd. v. Jasper Grocery*, 152 F. Supp. 2d 438, 443 (S.D.N.Y. 2001) (“***Failure to support a fee***
27 ***application with contemporaneous records generally results in denial of any award.***”) (emphasis added); *see also*
28 *Falcon Waterfree Techs., LLC v. Janssen*, No. 1:05-CV-551, 2008 WL 4534119, at *2 (W.D. Mich. Oct. 6, 2008)
29 (“[T]he risk of non-persuasion arising from an inadequate fee petition falls upon the moving party.”).

¹⁰ *Brunzell v. Golden Gate Nat’l Bank*, 85 Nev. 345, 455 P.2d 31 (1969).

<i>The VIPI Defendants' Unreasonable Fee Request</i>	\$91,090.00
<i>Reduction for Reasonable Hourly Rates</i>	(\$17,540.00)
<i>Reduction for Non-Recoverable Hours</i>	(\$11,455.00)
<i>Reduction for Unreasonable Billing Practices</i>	(\$31,047.50)
<i>Maximum Total Reasonable Award</i>	\$31,047.50

1. The Court Should Adjust the Hourly Rates of McLetchie Shell.

The VIPI Defendants seek an award of attorney's fees based on hourly rates ranging from \$100.00 to \$450.00. (VIPI Mot., 12:21 – 13:24.) However, two recent U.S. District of Nevada decisions establish that the rates requested are above market in this community.

First, in *Iacob v. Las Vegas Metropolitan Police Department*, Case No. 2:14-cv-00923-JAD-GWF, 2016 WL 344512 (D. Nev. Jan. 27, 2016), the district court ruled on a motion for attorney's fees filed by McLetchie Shell. In so doing, the district court assessed the reasonableness of the hourly rates requested by Margaret McLetchie (\$425.00) and Alina Shell (\$325.00). *Id.* at *1. After considering "prevailing market rates in Nevada charged by lawyers of reasonably comparable skill, experience, and reputation," the district court held that the rates sought were "not appropriate," and therefore, ordered that attorney's fees would be calculated using hourly rates of \$350.00 for Ms. McLetchie and \$250.00 for Ms. Shell. *See id.* (No adjustment was made to Ms. Burchfield's \$100.00 hourly rate.)

Second, in *Walker v. North Las Vegas Police Department*, Case No. 2:14-CV-01475-JAD-NJK, 2016 WL 3536172 (D. Nev. June 27, 2016), the district court ruled on a motion for attorney's fees filed by McLetchie Shell (among other law firms). Akin to the decision in *Iacob*, after considering "prevailing rates in the community," the district court found that the rates requested by Ms. McLetchie and Ms. Shell were unreasonable, and therefore, awarded attorney's fees based on hourly rates of \$350.00 and \$250.00, respectively.¹¹ *See id.* at *2. The district court further found that \$100.00 was a reasonable hourly rate for Ms. Burchfield based on her experience. *See id.*

¹¹ The district court correctly noted that Ms. Shell has very limited "experience in civil practice," having spent most of her career working on criminal matters. *Walker*, Case No. 2:14-CV-01475-JAD-NJK, 2016 WL 3536172, at *2.

1 These decisions are in line with prevailing market rates in the community. *See, e.g.,*
2 *Kiessling v. Rader*, No. 2:16-CV-00690-GMN-NJK, 2017 WL 1128605, at *3 (D. Nev. Mar. 24,
3 2017) (referencing “ample case law” on reasonable market rates for partners and associates in
4 Nevada). ***Importantly, whether the VIPI Defendants agreed to pay higher rates is irrelevant.***¹²
5 *See, e.g., Herrington v. Cty. of Sonoma*, 883 F.2d 739, 746 (9th Cir. 1989) (“[I]f the Herringtons
6 have agreed to pay their counsel more than what this court determines to be a reasonable hourly rate,
7 the Herringtons, not the County, are responsible for paying the portion of the rate charged which is
8 in excess of a reasonable fee.”).

9 Based on the foregoing, the Court should calculate a reasonable attorney’s fee for the VIPI
10 Defendants using an hourly rate of \$350.00 for Ms. McLetchie, an hourly rate of \$250.00 for Ms.
11 Shell, and an hourly rate of \$100.00 for Ms. Burchfield. (The Abrams Parties do not object to Mr.
12 Wolpert’s \$175.00 hourly rate or Mr. Czop’s \$100.00 hourly rate.¹³)

13 2. The Court Should Exclude Non-Recoverable Time.

14 The VIPI Defendants seek an award of attorney’s fees based on work performed by three
15 attorneys (Ms. McLetchie, Ms. Shell, and Mr. Wolpert) and three non-attorneys (Ms. Burchfield,
16 Mr. Czop, and Ms. Lopez). (VIPI Mot., 8:23 – 14:28.) However, of the 312.4 hours claimed, 55.6
17 hours are not recoverable under NRS 41.670(1)(a).

18 Contrary to the VIPI Defendants’ argument, a defendant who prevails on an anti-SLAPP
19 motion “***may recover fees and costs only for the motion to strike, not the entire litigation.***”
20 *Christian Research Inst.*, 81 Cal. Rptr. 3d at 870 (emphasis added). Stated differently, a defendant
21 may not recover fees and costs for “matters unrelated to the anti-SLAPP motion.” *569 E. Cty. Blvd.*
22 *LLC*, 212 Cal. Rptr. 3d at 310. ***This means that fees and costs that would have been incurred by***
23 ***the VIPI Defendants irrespective of their filing of an anti-SLAPP motion are not recoverable***
24 ***under NRS 41.670(1)(a).*** *See also Blackburn v. ABC Legal Svcs., Inc.*, No. 11-CV-01298 JSW NC,
25 2012 WL 1067632, at *4 (N.D. Cal. Feb. 24, 2012), *report and recommendation adopted*, No. C 11-

26 ¹² Ms. McLetchie did not say that the VIPI Defendants agreed to pay the rates requested. It is more likely than not
27 that her law firm agreed to represent the VIPI Defendants in this matter on a contingency basis (at least until the Court
ruled on their anti-SLAPP motion).

28 ¹³ As discussed below, none of the time billed by Ms. Lopez is recoverable; thus, her hourly rate is irrelevant.

1 01298 JSW, 2012 WL 1067551 (N.D. Cal. Mar. 28, 2012) (“The Court will deny fees that are not
2 unambiguously associated with the anti-SLAPP motion and associated motion for fees.”).

3 The billing invoices that accompany the VIPI Defendants’ Motion indicate that the VIPI
4 Defendants seek to recover a considerable amount of attorney’s fees based on work unrelated to their
5 motions to dismiss.¹⁴ For example, the VIPI Defendants seek fees for the following tasks (among
6 others): “Draft Notice of Appearance”; “Attention to NOA, IAFD”; “Draft preservation/freeze
7 letter”; “Draft Motion for Extension and Motion and Order for Order on Shortening Time re same”;
8 “Review case status”; “Communications with client”; “Draft response to freeze letter from Abrams.
9 Attention to retention of forensic expert...”; “Work with team re preservation issues”; “Craft motion
10 to strike”; Attention to documentation and files”; “Meeting with Steve; follow up with email to
11 Steve”; “Research re attorney’s fees requested in countermotions”; “Rule 11 sanctions/research”;
12 “Review filings from Willick case”; “Research and draft motion to dismiss appeal”¹⁵; and “Emails
13 with client.”¹⁶ These tasks are either unrelated to the motions to dismiss or would have been
14 performed irrespective of the filing of the motions to dismiss, and therefore, they are not
15 recoverable.¹⁷ See, e.g., *Lee-Tzu Lin v. Dignity Health-Methodist Hosp. of Sacramento*, No. CIV. S-
16 14-0666 KJM, 2014 WL 5698448, at *4 (E.D. Cal. Nov. 4, 2014) (“**Plaintiff is correct that**
17 **defendants seek reimbursement of fees expended for numerous tasks unrelated to preparing the**
18 **motion to strike . . . The court determines this time is not recoverable . . .**”) (emphasis added)
19 (internal citation omitted); *Ravet v. Stern*, No. 07CV31 JLS (CAB), 2010 WL 3076290, at *6 (S.D.
20 Cal. Aug. 6, 2010) (“**[M]any of these vague billings . . . are costs that would have been incurred in**
21 **the course of Stern’s representation of Wohlfeil irrespective of the anti-SLAPP motion. Thus,**
22 **these costs will not be included in the fee award.**”) (emphasis added) internal citation omitted).

24 ¹⁴ The Abrams Parties do not seek to exclude work involving the 12(b)(5) motion filed by the VIPI Defendants.

25 ¹⁵ This entry must be associated with a different matter because no appeal had been filed as of May 10, 2017.

26 ¹⁶ Attached hereto as Exhibit 1 is a copy of the billing invoices submitted by McLetchie Shell, with each non-
recovered time entry highlighted for the Court’s review.

27 ¹⁷ The VIPI Defendants also seek to recover attorney’s fees for time expended extending deadlines in this matter.
28 The Abrams Parties should not be penalized for granting (or obtaining) professional courtesies in order to account for
scheduling conflicts. Accordingly, all such time entries have been highlighted in Exhibit 1 and should be excluded.

1 In addition, it is undisputed that a party may not recover attorney’s fees for clerical or
 2 secretarial tasks. *Missouri v. Jenkins*, 491 U.S. 274, 288 n.10 (“***Of course, purely clerical or***
 3 ***secretarial tasks should not be billed at a paralegal rate, regardless of who performs them.***”)
 4 (emphasis added); *see also Keith v. Volpe*, 644 F. Supp. 1312, 1316 (C.D. Cal. 1986) (excluding
 5 “time spent on filing, document organization and other clerical matters that should be covered in
 6 hourly rates as normal overhead”). With that in mind, the Court should exclude the following time
 7 entries (among others) involving clerical or secretarial tasks: “Travel to Regional Justice Center,
 8 drop off Ex Parte Order to Judge Adair’s chambers”; “Go to post office, mail certified letter, return
 9 receipt requested”; “Check file; calendaring”; “Check file, docket, and upcoming dates”; “Dropped
 10 off three binders of Motion to Dismiss at the Las Vegas Regional Justice Center....”; “Draft
 11 Stipulation and Proposed Order....”; and “Picked up....”¹⁸

12 Because the above time entries, among others, are unrelated to the motions to dismiss or
 13 involve either clerical or secretarial tasks or work associated with professional courtesies, they
 14 should be excluded by the Court in calculating a reasonable attorney’s fee. *See, e.g., 569 E. Cty.*
 15 *Blvd. LLC*, 212 Cal. Rptr. 3d at 310; *Christian Research Inst.*, 81 Cal. Rptr. 3d at 870; *see also*
 16 *Lafayette Morehouse, Inc. v. Chronicle Publishing Co.*, 46 Cal. Rptr. 2d 542, 545 (Cal. Ct. App.
 17 1996) (***finding that the trial court erred by awarding “costs and fees for the entire case and not***
 18 ***just the motion to strike***) (emphasis added). These reductions reduce the hours that may be
 19 considered by the Court in awarding a reasonable attorney’s fee to the VIPI Defendants as follows:

Billor	Total Hours Claimed	Potentially Recoverable Hours
Pharan Burchfield	26.8	16.3
Gabriel Czop	5.2	4.3
Daniela Lopez	9.9	0
Margaret McLetchie	106.5	83.8
Alina Shell	55.5	53.8
Leo Wolpert	108.5	98.6
Total	312.4	256.8 ¹⁹

18 The highlighted time entries identified in Exhibit 1 also include clerical or secretarial tasks.

19 As set forth below, the Court should further reduce these hours by 50%, to 128.4 total hours, in order to account
 28 for unreasonable billing practices.

1 3. The Court Should Apply a 50% Across-the-Board Reduction to the
2 Remaining Hours Claimed.

3 In determining a reasonable attorney’s fee, the Court excludes time that is “excessive,
4 redundant, or otherwise unnecessary.” *Hensley v. Eckerhart*, 461 U.S. 424, 434 (1983); *see also In*
5 *re Amdura Corp.*, 139 B.R. 963, 968-69 (Bankr. D. Colo. 1992) (stating that attorneys should “meet
6 the Supreme Court’s expectation that every lawyer will heed his [or her] ethical obligation to
7 exclude excessive, redundant, or otherwise unnecessary time”). This is because “[h]ours that are
8 **not properly billed to one’s client also are not properly billed to one’s adversary pursuant to**
9 **statutory authority.**” *Hensley*, 461 U.S. at 434 (emphasis added).

10 The VIPI Defendants’ request to recover attorney’s fees based on 256.8 hours is patently
11 unreasonable. To begin, upon review of their counsel’s time entries, it is clear that Ms. McLetchie
12 did not adequately assign work among members of her law firm in an efficient and cost-effective
13 manner—e.g., prior to excluding non-recoverable time as outlined above, Ms. McLetchie billed only
14 two hours less than her associate, Mr. Wolpert. *Northon v. Rule*, 494 F. Supp. 2d 1183, 1187 (D. Or.
15 2007) (“It is expected that litigation is often performed in teams and that the team leader delegates
16 responsibility according to the talent of each team member and oversees the entire project.”); *accord*
17 *Melone v. Paul Evert’s RV Country, Inc.*, 2:08-cv-00868-GWF, 2012 WL 1142638, at *6 (D. Nev.
18 Apr. 3, 2012) (“In larger law firms, certain legal work may be performed by lower level associate
19 attorneys, law clerks or paralegals, whose work is supervised, reviewed or revised by more senior
20 level attorneys.”). **As a result, the Court would be well within its discretion to calculate a**
21 **reasonable attorney’s fee for a lot of the work performed by Ms. McLetchie at Mr. Wolpert’s**
22 **hourly rate.** *See, e.g., In re Fine Paper Antitrust Litig.*, 751 F. 2d 562, 591-93 (3d Cir. 1984)
23 (affirming the district court’s decision to compensate certain partner time at associate rates, because
24 the work should have been performed by associates).

25 Moreover, it is unknown why Ms. McLetchie had to “conduct extensive research regarding
26 Nevada and California’s Anti-SLAPP laws as well as federal case law interpreting both states’ Anti-
27 SLAPP statutes” given her “extensive experience handling First Amendment cases, defamation
28 litigation, and similar matters.” (VIPI Mot., 10:18-20, 12:25-27.) The fact that she (and other

1 members of her law firm) conducted extensive research of an area of law in which they claim to be
2 experts proves that an excessive amount of time was billed to the motions to dismiss. *See Ingram v.*
3 *Oroudjian*, No. CV 08-3917 GAF (VBKx), 2009 WL 10680651, at *4 (C.D. Cal. Oct. 5, 2009),
4 *aff'd*, 647 F.3d 925 (9th Cir. 2011) (“Further, Plaintiffs’ counsel, who claim substantial litigation
5 experience in the federal courts, contend they spent 14.7 hours researching the law on *Younger*
6 abstention, when the law is clear regarding parallel state and federal proceedings. Counsel can
7 hardly claim that they are entitled to a substantial hourly rate because of their years of experience
8 and then claim that they know so little of *Younger v. Harris* that they needed 14.7 hours to
9 familiarize themselves with the case and its progeny.”) (internal citation omitted).

10 ***Equally as concerning is the fact that three different attorneys and a paralegal worked on***
11 ***the motions to dismiss for a total of 102.6 hours*** (Ms. McLetchie – 33.5 hours; Ms. Shell – 9.6
12 hours; Mr. Wolpert – 55.0 hours; Ms. Burchfield – 4.5 hours).²⁰ Such overstaffing resulted in
13 excessive collaboration and duplication of effort, warranting a reduction in hours. *See, e.g., Fiolek v.*
14 *Tucson Unified School Dist.*, No. CV 01-36 TUC DCB, 2004 WL 3366149, at *4 (D. Ariz. Sept. 10,
15 2004); *see also* ABA CENTER FOR PROFESSIONAL RESPONSIBILITY, ANNOTATED MODEL RULES OF
16 PROFESSIONAL CONDUCT, at 77-82 (8th ed. 2015) (indicating that lawyers should not “charg[e] a lot
17 for doing very little,” nor bill for “excessive lawyering,” nor have too many lawyers work on a
18 matter).²¹

19 In addition to excessive and unnecessary time, members of McLetchie Shell block-billed a
20 majority of their time. Although not *per se* improper, block-billing precludes the Court from
21 determining whether time spent on various tasks was reasonable. *Metro Data Systems, Inc. v.*
22 *Durango Systems, Inc.*, 597 F. Supp. 244, 245 (D. Ariz. 1984). For example, and without limitation:
23 on January 23, 2017, Ms. McLetchie billed 5.7 hours for four different tasks; on February 15, 2017,
24 Ms. McLetchie billed 8.5 hours for seven different tasks; on February 16, 2017, Ms. Shell billed 9.1
25 hours for four different tasks; on February 16, 2017, Ms. Burchfield billed 4.5 hours for nine

26 ²⁰ Using the reduced rates recommended above, 126.2 hours equates with approximately \$322.67 per page!

27 ²¹ The Nevada Supreme Court consults the Annotated Model Rules for guidance in interpreting and applying the
28 Nevada Rules of Professional Conduct. *See, e.g., Liapis v. Second Jud. Dist. Ct.*, 128 Nev., Adv. Op. 39, 282 P.3d 733,
737 (2012); *Palmer v. Pioneer Inn Assocs., Ltd.*, 118 Nev. 943, 949 n.8, 59 P.3d 1237, 1240 n.8 (2002).

1 different tasks; on March 21, 2017, Ms. Shell billed 1.1 hours for three different tasks; on March 28,
2 2017, Ms. Burchfield billed 5.1 hours for five different tasks; on May 30, 2017, Ms. Shell billed 2.8
3 hours for three different tasks; and on August 21, 2017, Ms. Shell billed 6.2 hours for seven different
4 tasks. **“Because block billing makes it more difficult to determine how much time was spent on
5 particular activities, district courts may reduce hours that are billed in block format to avoid the
6 potential for padding.”** *Lightbourne v. Printroom Inc.*, No. SACV 13-876-JLS (RNBx), 2015 WL
7 12732457, at *4 (C.D. Cal. Dec. 10, 2015) (emphasis added) (internal quotation marks and citation
8 omitted); *see also Jones v. Southpeak Interactive Corp. of Del.*, No. 3:12CV443, 2014 WL 2993443,
9 at *9 (E.D. Va. July 2, 2014), *aff’d*, 777 F.3d 658 (4th Cir. 2015) (“The traditional remedy for block
10 billing is to reduce the fee by a fixed percentage reduction.”).

11 Finally, many of the time entries are vague and non-descriptive (“Attention to”; “Call with
12 Willick. Confer with Ms. Shell”; “Review case status”; “Emails to client”; “Call with client”;
13 “Review documents”; “Direct work on reply”; “[F]ollow up re deadline for same”; “Research re
14 same”; etc.). In the terms of the motions to dismiss, Mr. Wolpert often failed to say little more than
15 researching, writing, editing, or cite-checking. These types of time entries preclude the Court from
16 meaningfully assessing the reasonableness of the tasks performed and, equally importantly,
17 determining whether the tasks were related to this matter or a different matter, such as the lawsuit
18 filed by Marshal Willick against the VIPI Defendants (Case No. A750171).²²

19 Imprecise billing makes it difficult to engage in a meaningful review of time entries.
20 *Hensley*, 461 U.S. at 434. **As a result, fee reductions are common and warranted for vague and
21 non-descriptive time entries.** *See, e.g., Banas v. Volcano Corp.*, 47 F. Supp. 3d 957, 969 (N.D. Cal.
22 2014); *U.S. v. \$167,070.00 in U.S. Currency*, No. 3:13-CV-00324-LRH-VPC, 2015 WL 5057028, at
23 *5-*6 (D. Nev. Aug. 25, 2015).

24
25 ²² On February 17, 2017, the VIPI Defendants filed an anti-SLAPP motion in the *Willick v. Sanson* matter. Ms.
26 McLetchie was served with a “courtesy copy” of the motion despite not appearing as counsel of record for the VIPI
27 Defendants. It is unknown whether time spent by her and Mr. Wolpert in late January 2017 and early February 2017 was
28 related to the anti-SLAPP motion filed in the *Willick v. Sanson* matter, particularly since the VIPI Defendants did not file
their anti-SLAPP motion in this matter until March 28, 2017. Needless to say, it would be improper for the VIPI
Defendants to try to recover attorney’s fees and costs related to the *Willick v. Sanson* matter through the instant Motion
given that their anti-SLAPP motion to dismiss was denied in that matter.

1 The Court has ample reason to “severely curtail[] the number of compensable hours” sought
2 by the VIPI Defendants given the “vague, blockbilled time entries inflated with noncompensable
3 hours.” *Christian Research Institute*, 81 Cal. Rptr. 3d at 874. **Numerous courts in California have**
4 **substantially reduced unreasonable amounts of attorney’s fees and costs sought by similarly-**
5 **situated defendants who prevailed on anti-SLAPP motions.** See, e.g., *569 E. Cty. Blvd. LLC*, 212
6 Cal. Rptr. 3d at 307 (\$152,529.15 sought, \$30,752.86 awarded); *Christian Research Inst.*, 81 Cal.
7 Rptr. 3d at 869 (\$250,000.00 sought, \$21,300.00 awarded); *Maughan v. Google Techn., Inc.*, 49 Cal.
8 Rptr. 3d 861, 866-67 (Cal. Ct. App. 2007) (\$112,288.00 sought, \$23,000.00 awarded); *Crowe v.*
9 *Gogineni*, No. 2:11-CV-3438 JAM, 2014 WL 130488, at *2 (E.D. Cal. Jan. 13, 2014), *report and*
10 *recommendation adopted*, No. 2:11-CV-3438 JAM DAD, 2014 WL 1513277, at *2, *6 (E.D. Cal.
11 Apr. 16, 2014) (\$37,395.13 sought, \$17,062.50 awarded); *Ravet*, No. 07 CV 31 JSL (CAB), 2010
12 WL 3076290, at *2-*8 (\$43,185.00 sought, \$14,074 awarded).

13 **Nothing about this matter warranted over 256 hours’ worth of work by six different**
14 **members of McLetchie Shell.** *Lee-Tzu Lin*, No. CIV. S-14-0666 KJM, 2014 WL 5698448, at *1-*7
15 (reducing the amount sought by nearly \$100,000.00 in part due to the “non-complex nature of the
16 anti-SLAPP motion”); *Crowe*, No. 2:11-CV-3438 JAM, 2014 WL 130488, at *5 (“Instead, having
17 considered the nature of this action, defendant’s motion and the experience of defendant’s attorneys,
18 the undersigned finds that 75 hours of attorney time would be a reasonable number of hours to have
19 expended on the special motion to strike in question.”).

20 Based on these unreasonable billing practices, the Court should apply a 50% across-the-
21 board reduction to the remaining hours claimed, thereby calculating a reasonable attorney’s fee for
22 the VIPI Defendants based on 128.4 hours. See *569 E. Cty. Blvd. LLC*, 212 Cal. Rptr. 3d at 318
23 (affirming the trial court’s decision to downwardly adjust the amount of hours claimed in a motion
24 for attorney’s fees and costs due to the inclusion of non-recoverable work, block-billing, vague time
25 entries, and unnecessary bill padding).

26 * * * *

27 For these reasons, the Court should award no more than \$31,047.50 in reasonable attorney’s
28 fees to the VIPI Defendants.

1 **C. The VIPI Defendants May Not Recover All of their Claimed Costs.**

2 The VIPI Defendants seek \$4,517.18 in costs. (VIPI Mot., 4:5-7.) The Court should deny
3 their request for costs associated with forensic imaging of Mr. Sanson’s computer and photocopies.

4 Specifically, the Court should deny the VIPI Defendants’ request for \$1,175.00 in costs
5 incurred with Privacy Technician, Inc., a company that assists with “forensic processes and
6 planning.” (*Id.*, 5:18-21.) Similarly, the Court should deny the VIPI Defendants’ request for
7 \$252.09 in costs incurred by having Mr. Sanson’s hard drive “cloned, copied, and reinstalled on his
8 computer.” (*Id.*, 5:23-25.) Pursuant to the above authority, such costs are not recoverable as a
9 matter of law under NRS 41.670(1)(a) because they were unrelated to the motions to dismiss.

10 Moreover, the Court should exclude the VIPI Defendants’ request for \$264.08 in costs for
11 photocopying, because the VIPI Defendants failed to do anything more than provide the amount of
12 copies made by their counsel on a monthly basis.²³ *See Cadle Co. v. Woods & Erickson, LLP*, 131
13 Nev., Adv. Op. 15, 345 P.3d 1049, 1054-55 (2015) (finding that the district court lacked “justifying
14 documentation to award photocopy costs” because the defendant failed to show “why the copying
15 costs were reasonable or necessary”). As recently articulated by the Nevada Supreme Court, more is
16 required than a summary of monthly copies substantiated by a conclusory affidavit of counsel.
17 *Matter of DISH Network Derivative Litig.*, 133 Nev., Adv. Op. 61, 401 P.3d 1081, 1093 (Nev.
18 2017). Rather, the party must produce “**documentation substantiating the reason for each copy.**”
19 *Cadle Co.*, 131 Nev., Adv. Op. 15, 345 P.3d at 1054 (emphasis added). The VIPI Defendants failed
20 to do so here.

21 For these reasons, the Court should award no more than \$2,754.33 in costs to the VIPI
22 Defendants.

23 ...
24 ...
25 ...
26 ...

27 _____
28 ²³ Exhibit “3” to the VIPI Defendants’ Motion includes monthly amounts for copy costs—it does not specify when
each month various copies were made and what was copied.

1 **D. The Schneider Defendants Seek an Unreasonable – and Unsubstantiated –**
2 **Amount of Attorney’s Fees.**

3 1. The Court Should Deny the Schneider Defendants’ Motion “Altogether”
4 Because the Schneider Defendants Sought an Unreasonable Amount of
5 Attorney’s Fees Without Supporting Documentation.

6 The Schneider Defendants seek an award of attorney’s fees based on the following evidence:
7 “That your Declarant, C.J. Potter, IV, Esq., Cal J. Potter, III, Esq., and their Paralegals expended
8 189.4 hours and \$80,495.00 working on this matter.” (Schneider Mot., 5:4-5; *see also id.*, 3:4 – 5:3
9 (describing the rates charged by Cal Potter, CJ Potter, Tanya Bain, and Linda Potter).) No billing
10 invoices were attached to their Motion, despite the plain language of N.R.C.P. 54(d)(2)(B) (requiring
11 “documentation concerning the amount of fees claimed” to accompany a motion for attorney’s fees).
12 That omission merits denial of their Motion without further review. *See, e.g., Joe Hand Promotions,*
13 *Inc. v. Be*, No. 11-CV-01333-LHK, 2011 WL 5105375, at *7 (N.D. Cal. Oct. 26, 2011) (denying a
14 motion for attorney’s fees because “counsel has provided no documentation to justify recovery of
15 attorney’s, paralegal or administrative fees, such as a curriculum vitae or resume, billing and cost
16 records (not merely a reconstruction of services and hours long after the fact), or other relevant
17 information”); *see also Moreno*, No. 65714, 2015 WL 9464437, at *2 (affirming the district court’s
18 order denying a motion for attorney’s fees and costs “due to the lack of supporting documentation”).

19 Even if the Court overlooks the Schneider Defendants’ failure to provide billing invoices
20 itemizing the work performed by their counsel, it still should not find that the scant information
21 provided is sufficient to assist the Court in determining a reasonable attorney’s fee. For example, of
22 the 189.4 hours claimed, the Schneider Defendants did not allocate those hours among Cal Potter, CJ
23 Potter, Ms. Bain, and Ms. Potter. Moreover, the Schneider Defendants did not attribute the 189.4
24 hours to different tasks performed in this matter by different timekeepers (e.g., identify how many
25 hours were attributed to the anti-SLAPP motion, the 12(b)(5) motion, legal research,
26 correspondence, client meetings, document collection, and review of briefs filed by the VIPI
27 Defendants). ***Simply put, the Schneider Defendants have placed the Court in the untenable***
28 ***position of arbitrarily determining whether the 189.4 hours claimed was reasonably expended on***
 the motions to dismiss. See, e.g., Uriarte v. Bostic, No. 15CV1606-MMA (PCL), 2017 WL

BAILEY ♦ KENNEDY
8984 SPANISH RIDGE AVENUE
LAS VEGAS, NEVADA 89148-1302
702.562.8820

1 3387612, at *3 (S.D. Cal. Aug. 7, 2017) (denying a motion for attorney’s fees and costs by a
2 defendant who prevailed on an anti-SLAPP motion due to the paucity of information included with
3 the motion justifying the rates charged and hours expended, saying, “Any award based on the
4 information provided by Defendants would necessarily be arbitrary”).

5 Finally, the Schneider Defendants’ greed warrants denial of their Motion in its entirety.

6 If ... the Court were required to award a reasonable fee when an outrageously
7 unreasonable one has been asked for, claimants would be encouraged to make
8 unreasonable demands, knowing that the only unfavorable consequence of such
9 misconduct would be reduction of their fee to what they should have asked in the first
10 place. *To discourage such greed, a severer reaction is needful . . .*

11 Alnor contends a significantly higher award, of some unspecified amount, was
12 necessary to serve the interests of the anti-SLAPP statute. *But counsel may not*
13 *leverage the statute to obtain an “unjust” award.* As our Supreme Court observed in
14 *Ketchum*, “A fee request that appears unreasonably inflated is a special circumstance
15 permitting the trial court to reduce the award or deny one altogether.” *The trial court*
16 *could reasonably conclude the inflated, noncredible, often vaguely documented*
17 *hours claimed by counsel precluded turning Alnor’s contingent fee arrangement*
18 *with counsel into a windfall.*

19 *Christian Research Inst.*, 81 Cal. Rptr. 3d at 877 (emphasis added) (internal quotation marks and
20 citation omitted).

21 For these reasons, the Court should refuse to award attorney’s fees to the Schneider
22 Defendants.

23 2. The Court Should Substantially Reduce the Amount of Attorney’s Fees
24 Sought by the Schneider Defendants.

25 The Schneider Defendants have sought an award of attorney’s fees using the “lodestar”
26 methodology. (Schneider Mot., 5:4-5.) As set forth below, assuming (*arguendo*) that the Court
27 awards attorney’s fees to the Schneider Defendants based on the information presented with their
28 Motion, in calculating a reasonable attorney’s fee, the Court should estimate recoverable time based
on total hours claimed by certain members of McLetchie Shell; reduce the rates sought; exclude
estimated time by members of Potter Law Offices that is not recoverable; and make an across-the-
board reduction to the estimated remaining hours claimed due to unreasonable billing practices.

Shuette v. Beazer Homes Holdings Corp., 121 Nev. 837, 864-65, 124 P.3d 530, 548-49 (2005)
(indicating that a district court may use “any method rationally designed to calculate a reasonable

1 amount” of attorney’s fees). Upon making such reasonable adjustments, the Court should find that
 2 the Schneider Defendants are entitled to no more than \$6,727.50 in reasonable attorney’s fees,
 3 summarized as follows:

4 <i>The Schneider Defendants’ Unreasonable Fee Request</i>	\$80,495.00
5 <i>Adjustment Through Estimation of Hours Incurred</i>	(\$4,470.00)
6 <i>Reduction for Reasonable Hourly Rates</i>	(\$22,195.00)
7 <i>Reduction for Non-Recoverable Hours</i>	(\$40,375.00)
8 <i>Reduction for Unreasonable Billing Practices</i>	(\$6,727.50)
9 <i>Maximum Total Reasonable Award</i>	\$6,727.50

10 a. *The Court Should Estimate Hours Incurred by Potter Law Offices.*

11 The Schneider Defendants seek an award of attorney’s fees based on work performed by two
 12 attorneys (Cal Potter and CJ Potter) and two non-attorneys (Ms. Potter and Ms. Bain). (Schneider
 13 Mot., 3:4 – 5:5.) However, as noted above, because the 189.4 hours claimed are not allocated
 14 among attorneys and non-attorneys, for purposes of the Motion, the Court should use total hours
 15 claimed by certain members of McLetchie Shell for guidance. Specifically, the Court should assume
 16 as follows: Cal Potter billed 106.5 hours (akin to the total hours claimed by Ms. McLetchie); CJ
 17 Potter billed 55.5 hours (akin to the total hours claimed by Ms. Shell); and Ms. Bain and Ms. Potter,
 18 together, billed 26.8 hours (akin to the total hours claimed by Ms. Burchfield).

19 b. *The Court Should Adjust the Hourly Rates of Potter Law Offices.*

20 The Schneider Defendants seek an award of attorney’s fees based on hourly rates ranging
 21 from \$125.00 to \$500.00. (Schneider Mot., 3:4 – 5:5.) However, the Schneider Defendants failed to
 22 justify those rates for this matter.

23 For example, the Schneider Defendants describe – at length – Cal Potter’s experience in
 24 criminal law. (*Id.*, 3:4 – 4:3.) They also reference his experience in personal injury and legal ethics.
 25 However, nothing is said about his experience with civil matters involving defamation and related
 26 torts. Thus, while the Schneider Defendants have explained why Cal Potter may charge \$500.00 per
 27 hour for representing clients in criminal and personal injury cases, they have failed to explain why
 28 Cal Potter may charge \$500.00 per hour for representing clients in defamation cases. Nevada RPC

1 1.5(a)(3) (considering “[t]he fee customarily charged in the locality *for similar legal services*”)
2 (emphasis added); *see also Ingram v. Oroudjian*, 647 F.3d 925, 928 (9th Cir. 2011) (“In determining
3 a reasonable hourly rate, the district court should be guided by the rate prevailing in the community
4 for similar work performed by attorneys of comparable skill, experience, and reputation.”).

5 Similarly, the Schneider Defendants do not discuss CJ Potter’s prior experience, if any, with
6 civil matters involving defamation and related torts; instead, they highlight his “CALI Excellence for
7 the Future Award for Trial Advocacy” and his prior handling of appeals involving unknown areas of
8 the law. (Schneider Mot., 4:4-16.) Even if he has prior experience with First Amendment issues, CJ
9 Potter’s hourly rate is unquestionably high for a lawyer who has practiced law for less than four
10 years. *See, e.g., Kiessling*, No. 2:16-CV-00690-GMN-NJK, 2017 WL 1128605, at *3 (finding
11 \$200.00 per hour to be reasonable for an attorney with “three to four years of experience”).

12 Finally, nothing suggests that Ms. Potter and Ms. Bain have substantial experience with
13 defamation and related torts. The Potter Law Offices advertises as a “personal injury law firm,”
14 saying that it focuses on helping “those with personal injuries, those accused of a crime, and those
15 with serious brain, spinal and orthopedic injuries.”²⁴ Nothing is said about First Amendment work;
16 or even general civil litigation.

17 Based on the foregoing, using the rates recommended for members of McLetchie Shell, the
18 Court should calculate a reasonable attorney’s fee for the Schneider Defendants using an hourly rate
19 of \$350.00 for Cal Potter, an hourly rate of \$250.00 for CJ Potter, and an hourly rate of \$100.00 for
20 Ms. Potter and Ms. Bain.

21 c. *The Court Should Exclude Non-Recoverable Time and Apply a 50%*
22 *Across-the-Board Reduction to the Estimated Remaining Hours*
23 *Claimed.*

24 As noted above, the Court should estimate that the Schneider Defendants seek an award of
25 attorney’s fees based on 188.8 hours’ worth of work. That being said, “*there is no way on earth this*
26 *case justified the hours purportedly billed by [the Schneider Defendants] lawyers.*” *Harrington v.*
27 *Payroll Entm’t Svcs., Inc.*, 72 Cal. Rptr. 3d 922, 925 (Cal. Ct. App. 2008) (emphasis added).

28 ²⁴ Home Page, Potter Law Offices, *available at* <https://www.potterlawoffices.com/>, attached as Exhibit 2; Firm
Overview, Potter Law Offices, *available at* <https://www.potterlawoffices.com/firm/>, attached as Exhibit 3.

1 *Specifically, a comparison of the work performed by the VIPI Defendants to the work*
 2 *performed by the Schneider Defendants proves that the Schneider Defendants’ counsel grossly*
 3 *overbilled for their services.* For example, excluding cover pages, tables of contents, tables of
 4 authorities, notices of hearings, certificates of service, and exhibits, the VIPI Defendants’ 12(b)(5)
 5 motion and anti-SLAPP motion total 73 pages, while the Schneider Defendants’ 12(b)(5) motion and
 6 anti-SLAPP motion total 14 pages—an 80% differential. Similarly, the VIPI Defendants filed a 33-
 7 page Omnibus Reply in support of their 12(b)(5) motion and anti-SLAPP motion, together with an 8-
 8 page Supplemental Omnibus Reply; the Schneider Defendants did not file a written response to
 9 either the Abrams Parties’ Omnibus Opposition to the anti-SLAPP motions or the Abrams Parties’
 10 Supplement to their Omnibus Opposition. Finally, as the Court observed during the July 5, 2017
 11 hearing, Ms. McLetchie “carried the day” in terms of presenting argument for the Defendants; Cal
 12 Potter spoke for approximately 2 minutes. (*See* Tr., June 5, 2017, 2:12, 19:9 – 21:10, 44:3-15, 66:16
 13 – 67:4.) Though the Schneider Defendants prevailed before the Court (an issue to be addressed on
 14 appeal), they did so by riding the VIPI Defendants’ proverbial coattails.

15 Although unknown, the Schneider Defendants’ counsel likely spent a lot of time reviewing
 16 briefs filed by the other parties (both in this matter and in other, unrelated matters). Such excessive
 17 and unnecessary time should not be included in any award of reasonable attorney’s fees because it
 18 did not assist the Schneider Defendants in preparing their own briefs. *See, e.g., Innovative Mold*
 19 *Sols., Inc. v. Cent. Mut. Ins. Co., Inc.*, No. 15-CV-40010, 2017 WL 4381666, at *4 (D. Mass. Sept.
 20 29, 2017) (criticizing a party for excessive time reviewing documents).

21 Based on the foregoing, the Court should estimate that Cal Potter and CJ Potter spent one-
 22 fourth (¼) of the amount of time that Ms. McLetchie and Ms. Shell spent working on this matter,
 23 while Ms. Bain and Ms. Potter, together, spent one-fourth (¼) of the amount of time that Ms.
 24 Burchfield spent working on this matter. Doing so reduces the hours that may be considered in
 25 awarding a reasonable attorney’s fee to the Schneider Defendants as follows:

Billor	Total Hours Claimed	Potentially Recoverable Hours
Cal Potter	106.5	26.6
CJ Potter	55.5	13.9
Tanya Bain/Linda Potter	26.8	6.7
Total	188.8	47.2

1 3775396, at *3 (D. Nev. Aug. 30, 2017). Such a requirement harmonizes with NRS 41.670(2)-(3),
2 requiring a plaintiff who successfully opposes an anti-SLAPP motion to show that the motion was
3 “frivolous or vexatious” prior to receiving an award of attorney’s fees, costs, and sanctions. *Allianz*
4 *Ins. Co. v. Gagnon*, 109 Nev. 990, 993, 860 P.2d 720, 723 (1993) (“Whenever possible, this court
5 will interpret a rule or statute in harmony with other rules and statutes.”).

6 The Court must undertake a “two-pronged analysis” in deciding whether the Abrams Parties’
7 claims were frivolous; that is, decide whether (i) the claims were grounded in fact and warranted by
8 existing law and (ii) made with “reasonable and competent inquiry” prior to filing them. *Bergmann*
9 *v. Boyce*, 109 Nev. 670, 676, 856 P.2d 560, 564 (1993).

10 2. The Abrams Parties’ Claims were Neither Frivolous nor Vexatious.

11 The Abrams Parties brought this action in good faith seeking redress for what they maintain
12 is an actionable smear campaign orchestrated by the Defendants. The Court disagreed, finding that
13 the VIPI Defendants’ alleged defamatory statements “were either true statements of fact, or were
14 statements of opinion which were incapable of being false.”²⁶ (Order, July 24, 2017, 15:6-8.)
15 ***Importantly, the Court did not also find that the Abrams Parties’ claims were unsupported in law***
16 ***or fact and made without a reasonable and competent inquiry.*** (See generally *id.*)

17 The fact that the Court found that the Abrams Parties failed to establish “a probability of
18 success” on their claims does not—without more—mean that the Abrams Parties’ claims were
19 frivolous or vexatious. That ends the analysis in terms of sanctions.

20 Notwithstanding, the VIPI Defendants argue that the Abrams Parties sued them as a means of
21 trying to silence their critics.²⁷ (VIPI Mot., 15:3-21.) If that was their intention (it was not), they
22 were obviously unsuccessful—the VIPI Defendants continue to relentlessly denigrate members of
23 the Nevada Bar through social media (e.g., on October 9, 2017, Mr. Sanson posted the following
24 comment: “All you corrupt lawyers in Clark County Family Court that use your influence, by way of
25

26 ²⁶ On August 4, 2017, the Schneider Defendants’ counsel sent to undersigned counsel for review – via email – a
27 draft Order granting the Schneider Defendants’ anti-SLAPP motion. On August 17, 2017, undersigned counsel sent to
the Schneider Defendants’ counsel – via email – proposed changes to the draft Order. Nothing further has occurred.

28 ²⁷ The Schneider Defendants joined this argument. (See Joinder, Sept. 15, 2017.)

1 friendship, status in the community, and money. We are coming after You!”).²⁸ Because the VIPI
2 Defendants remain undeterred in waging “war” on the Family Court system,²⁹ the Court should
3 refuse to find that the Abrams Parties sued the VIPI Defendants solely as a means to chill the VIPI
4 Defendants’ First Amendment rights.

5 In effect, Mr. Sanson would have the Court find that he deserves sanctions because he is a
6 purist who seeks to educate the public about unscrupulous lawyers and judges. In truth and in fact,
7 he has an ulterior agenda in operating VIPI—i.e., seeking to “*manipulate, intimidate, and control*”
8 members of the Nevada Bar—and will pursue that agenda *by any means necessary*, including by
9 threatening an esteemed Family Court Judge who would not “succumb to [his] desired result.”³⁰

10 Mr. Schneider, too, is not without blame. He enlisted Mr. Sanson to target Ms. Abrams.³¹
11 Whether or not Mr. Sanson defamed Ms. Abrams (he did, repeatedly and unabashedly), the fact
12 remains that Mr. Schneider directed Mr. Sanson to publicly vilify Ms. Abrams. Mr. Schneider said,
13 in direct response to the filing of a motion for sanctions by the Abrams Parties in the *Saiter v. Saiter*
14 matter: “If your firm does not withdraw that motion, I will oppose it *and take additional action*
15 *beyond the opposition.*”³² His message rang loud and clear; he knew exactly what Mr. Sanson
16 would do with the September 29, 2016 video (despite feigning ignorance to his client).³³

17 Finally, the Court seemingly noted the complex nature of the issues presented in this matter
18 during the hearing on the anti-SLAPP motions. (*See* Tr., July 5, 2017, 54:3 (“I mean, the briefs were
19 very, very good.”).) As a result, it cannot be said that the Abrams Parties’ claims were frivolous or

21 ²⁸ See Sample VIPI Facebook Posts, available at <https://www.facebook.com/VIPIstavesanson/>, attached as
22 Exhibit 4; see also VIPI Website, available at http://web-extract.constantcontact.com/v1/social_annotation?permalink_&image_url=https%3A%2F%2Fmlsvc01-prod.s3.amazonaws.com%2Ff4fde64c401%2Ff613f9f1-dd3c-4e58-b49e-cce2d0ec4c00.jpg%3Fver%3D1507924100000, attached as Exhibit 5.

23 ²⁹ See Exs. 4-5.

24 ³⁰ See Order of Recusal, Sept. 5, 2017, *Irina Ansell v. Douglas Ansell*, Case No. D-15-521960-D, attached as
Exhibit 6, at pgs. 6-9 (emphasis added).

25 ³¹ Despite repeated invitations during the briefing process and at oral argument, Mr. Schneider refused to deny
26 enlisting Mr. Sanson’s “services” to defame and disparage the Abrams Parties.

27 ³² Email from Mr. Schneider to Brandon Leavitt, Sept. 15, 2016, attached as Exhibit 7.

28 ³³ Email from Mr. Schneider to Tina Saiter, forwarded to Brandon Saiter, Oct. 6, 2016, attached as Exhibit 8
(claiming that he is “not happy about” Mr. Sanson posting the September 29, 2016 hearing video, saying, “There is
apparently some sort of war between [VIPI] and the other side”).)

1 vexatious. *See Baldonado v. Wynn Las Vegas, LLC*, 124 Nev. 951, 967-68, 194 P.3d 96, 106-07
2 (2008) (refusing to award attorney’s fees pursuant to NRS 18.010(2)(b), which likewise requires a
3 finding that a claim was frivolous or “brought or maintained without reasonable ground or to harass
4 the prevailing party,” saying, “[T]he law in this matter is complex and was unsettled. Since
5 appellants raised reasonably supportable, if not ultimately successful, arguments, the district court
6 did not abuse its discretion in determining that appellants’ claims were brought with reasonable
7 grounds and in denying the Wynn’s motion for attorney fees”).

8 For these reasons, the Court should refuse to award \$10,000.00 in statutory sanctions to any
9 of the Defendants.

10 3. The Court Should Reject the Schneider Defendants’ Request for Additional
11 Sanctions Pursuant to the Court’s Inherent Authority.

12 The Schneider Defendants ask the Court to go above and beyond awarding attorney’s fees,
13 costs, and statutory sanctions—they also ask the Court to exercise its inherent authority to sanction
14 the Abrams Parties for an additional \$80,495.00.³⁴ (Schneider Mot., 9:8-10.) In other words, the
15 Schneider Defendants seek “a total of \$170,990.00.” (*Id.*) Their request is beyond the pale.

16 The Court has the inherent authority to sanction a party for “litigation abuses not specifically
17 proscribed by statute.” *Young v. Johnny Ribeiro Bldg.*, 106 Nev. 88, 92, 787 P.2d 777, 779 (1990).
18 Such sanctions must be “reasonably proportionate to the litigant’s misconduct.” *Emerson v. Eighth*
19 *Jud. Dist. Ct.*, 127 Nev. 672, 681, 263 P.3d 224, 230 (2011) (quotation marks and citation omitted).

20 As a preliminary matter, because NRS 41.670(1)(b) specifically addresses the alleged wrong
21 giving rise to the Schneider Defendants’ request for sanctions (i.e., filing a SLAPP), the Court
22 should decline to separately consider exercising its inherent authority to sanction the Abrams Parties
23 for suing the Schneider Defendants. Regardless, the Abrams Parties did not abuse the litigation
24 process by seeking redress for what they maintain is a covert attempt by the Schneider Defendants
25 (in concert with the VIPI Defendants) to cause harm to the Abrams Parties.

26
27
28 ³⁴ The VIPI Defendants did not seek sanctions beyond those permitted under NRS 41.670(1)(b).

1 The Schneider Defendants argue that sanctions are warranted because the Abrams Parties
2 named them “in all eleven causes of action.” (Schneider Mot., 7:3-4.) Of course they did; a co-
3 conspirator “is liable for any tortious act, even unknown, committed in furtherance of the
4 conspiracy, including acts not personally committed.” *Baker ex rel. Hall Brake Supply, Inc. v.*
5 *Stewart Title & Trust of Phoenix, Inc.*, 5 P.3d 249, 256 (Ariz. Ct. App. 2000). It did not matter
6 whether Mr. Schneider actually published the defamatory statements at issue in this matter, so long
7 as he conspired with Mr. Sanson to defame and disparage the Abrams Parties.

8 During the July 5, 2017 hearing, the Schneider Defendants’ counsel acknowledged that the
9 Schneider Defendants were alleged to be liable for the torts committed by the VIPI Defendants by
10 virtue of conspiring with the VIPI Defendants. (Tr., July 5, 2017, 19:11-18 (“The Court: Do you
11 agree that the allegations against your client arise out of the conspiracy? Mr. Potter: Yes . . . The
12 Court: But he is liable apparently through a civil conspiracy theory? Mr. Potter: Correct.”).)
13 Because their counsel conceded – in open Court – that the Abrams Parties had a basis in law to name
14 them “in all eleven causes of action,” the Schneider Defendants cannot now argue that the Abrams
15 Parties should be sanctioned for naming them “in all eleven causes of action.”

16 In the end, the Schneider Defendants’ request for sanctions pursuant to the Court’s inherent
17 authority *combined with* their request for sanctions pursuant to NRS 41.670(1)(b) is, ironically,
18 vindictive and designed to unfairly punish the Abrams Parties. Their request, which they freely
19 admit would be “duplicative,” (Schneider Mot., 8:2-3), should be denied.

20 III. CONCLUSION

21 The Defendants seek to capitalize on dismissal of this lawsuit by requesting an exorbitant
22 amount of attorney’s fees, costs, and sanctions. But dismissal of a SLAPP is not intended to result in
23 a financial windfall for the Defendants.

24 The Court must award “reasonable” attorney’s fees to the VIPI Defendants and the Schneider
25 Defendants (assuming (*arguendo*) that the Court excuses the Schneider Defendants’ inexplicable
26 failure to substantiate their Motion with detailed billing invoices). A “reasonable” attorney’s fee for
27 the VIPI Defendants is \$31,047.50 (plus \$2,754.33 in costs), and a reasonable attorney’s fee for the
28

1 Schneider Defendants is \$6,727.50. Any awards in excess of those amounts would be contrary to
2 language and intent of NRS 41.670(1)(a).

3 The Court should decline to award additional sanctions to any of the Defendants. The
4 Abrams Parties' claims were neither frivolous nor vexatious; the Abrams Parties were publicly
5 dragged across the metaphorical coals and sought redress for it. The Court determined that they had
6 failed to show a probability of success in pursuing their claims against the Defendants. But
7 dismissal of their lawsuit—without more—is not akin to a finding that their lawsuit was baseless.

8 For these reasons, the Court should deny the instant Motions.

9 DATED this 27th day of October, 2017.

10 BAILEY ♦ KENNEDY

11 By: /s/ Joshua P. Gilmore

12 DENNIS L. KENNEDY

13 JOSHUA P. GILMORE

14 AND

15 JENNIFER V. ABRAMS

16 THE ABRAMS & MAYO LAW FIRM

17 6252 South Rainbow Blvd., Ste. 100

18 Las Vegas, NV 89118

19 MARSHAL S. WILICK

20 WILICK LAW GROUP

21 3591 E. Bonanza Road

22 Las Vegas, NV 89110

23 *Attorneys for Plaintiffs*

24 Jennifer V. Abrams and The Abrams &
25 Mayo Law Firm

26
27
28

EXHIBIT 1

EXHIBIT 1

MCLETCHE SHELL

Date	Time Expended	Biller	Rate	Description	Total
1/23/2017	5.7	Margaret McLetchie	\$450.00	Check docket and review and analyze materials. Review compiled research re Anti-SLAPP law procedural issues and begin preparing memo. Emails to opposing counsel. Communications with client.	\$2,565.00
1/23/2017	2.4	Margaret McLetchie	\$450.00	Continue research re Anti-SLAPP statute, review sample motions, and Nevada Supreme Court case law. Research related procedural issues and recent case developments from California.	\$1,080.00
1/23/2017	0.2	Pharan Burchfield	\$150.00	Draft Notice of Appearance to be filed tomorrow after attorney's review.	\$30.00
1/23/2017	0.3	Pharan Burchfield	\$150.00	Organize electronic copy of files/documents received from Mr. Sanson.	\$45.00
1/24/2017	1	Margaret McLetchie	\$450.00	Call with Ms. Abrams to introduce self, discuss matter, and discuss stipulation to avoid work on 12(b)(5) motion in advance of determination on Anti-SLAPP motion. Attention to drafting of stipulation and follow-up re same.	\$450.00
1/24/2017	1.6	Margaret McLetchie	\$450.00	Further review and analysis of file.	\$720.00
1/24/2017	0.2	Margaret McLetchie	\$450.00	Attention to NOA, IAFD	\$90.00
1/24/2017	0.7	Pharan Burchfield	\$150.00	Draft preservation/freeze letter. Attention to compiling information from client.	\$105.00
1/24/2017	0.3	Pharan Burchfield	\$150.00	Draft Stipulation and [Proposed] Order re extension to file Response to Complaint; email communications with Ms. Abrams re same.	\$45.00
1/24/2017	0.2	Pharan Burchfield	\$150.00	Finalize and file Notice of Appearance; serve/mail re same. Draft and file Initial Appearance Fee Disclosure. Email communications with Mr. Sanson re same.	\$30.00

MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
1/25/2017	0.8	Margaret McLetchie	\$450.00	Edit stipulation and respond to email from Ms. Abrams. Review email refusing to stipulate (change of position); leave message for Ms. Abrams. Review her email response, continuing to refuse to reasonable stipulation and stating that she will not communicate except in email. Review NOA by Mr. Willick and direct staff to communicate with him.	\$360.00
1/25/2017	0.1	Pharan Burchfield	\$150.00	Update Stipulation (substitute Plaintiffs' new counsel information) and email re same to Mr. Willick for review/approval.	\$15.00
1/25/2017	0.2	Pharan Burchfield	\$150.00	Review emails from Mr. Sanson re texts, emails, and videos. Download and save accordingly.	\$30.00
1/26/2017	0.2	Alina Shell	\$350.00	Per Ms. McLetchie's request, review Eighth Judicial District Court Rules regarding motions for extensions of time. Confer with Ms. McLetchie re same.	\$70.00
1/26/2017	0.2	Margaret McLetchie	\$450.00	Email to Mr. Willick re directing communications since Abrams/ Abrams & Mayo now represented.	\$90.00
1/26/2017	3.1	Margaret McLetchie	\$450.00	Continued research re Anti-SLAPP issues.	\$1,395.00
1/26/2017	1.1	Pharan Burchfield	\$150.00	Draft Motion for Extension and Motion and Order for Order on Shortening Time re same.	\$165.00
1/27/2017	0.5	Alina Shell	\$350.00	Research regarding legislative history of NRS 41.650 - statute regarding immunity from civil action for statements re public matters. Edit motion for extension of time pursuant to research. Circulate edit to Ms. McLetchie.	\$175.00
1/27/2017	0.4	Gabriel Czop	\$25.00	Travel to Regional Justice Center, drop off Ex Parte Order to Judge Adair's chambers. [billed at lower rate]	\$10.00

MCLETCHE SHELL

Date	Time Expended	Biller	Rate	Description	Total
1/27/2017	1.1	Margaret McLetchie	\$450.00	Call with Willick. Confer with Ms. Shell.	\$495.00
1/27/2017	0.1	Pharan Burchfield	\$150.00	Research dockets of similar cases for Ms. McLetchie; download docket and latest Complaint for Damages against Mr. Sanson.	\$15.00
1/27/2017	2.3	Pharan Burchfield	\$150.00	Editing and incorporating Ms. McLetchie's edits to Motion for Extension and Motion for an Order on Shortening Time re same. Prepare Declarations, exhibits, and proposed Orders re same. File and serve/mail/email/fax re same.	\$345.00
1/29/2017	0.2	Margaret McLetchie	\$450.00	Respond to email from Marshal Willick re scheduling, possible stipulation.	\$90.00
1/29/2017	0.3	Margaret McLetchie	\$450.00	Review case status.	\$135.00
1/30/2017	1.2	Margaret McLetchie	\$450.00	Review amended complaint; address issues re Order Shortening Time; call to chambers.	\$540.00
1/30/2017	0.2	Margaret McLetchie	\$450.00	Emails to client.	\$90.00
1/30/2017	1	Margaret McLetchie	\$450.00	Communications with client.	\$450.00
2/2/2017	2.3	Margaret McLetchie	\$450.00	Draft freeze letter. Research regarding preservation.	\$1,035.00
2/2/2017	0.2	Pharan Burchfield	\$150.00	Attention to preservation/freeze letters from opposing counsel.	\$30.00
2/3/2017	0.2	Alina Shell	\$350.00	Phone call with forensics expert. Sign freeze letter on behalf of Ms. McLetchie.	\$70.00
2/3/2017	0.1	Gabriel Czop	\$100.00	Research and locate a Nevada case that articulates the requirement to preserve evidence in anticipation of litigation.	\$10.00
2/3/2017	0.4	Gabriel Czop	\$100.00	Go to post office, mail certified letter, return receipt requested.	\$40.00

MCLETCHIE SHELL

Date	Time Expended	Biller	Rate	Description	Total
2/3/2017	2.6	Margaret McLetchie	\$450.00	Draft response to freeze letter from Abrams. Attention to retention of forensic expert. Attention to factual issues and related work.	\$1,170.00
2/3/2017	0.3	Pharan Burchfield	\$150.00	Finalize preservation/freeze letter. Send/email to Mr. Willick re same.	\$45.00
2/3/2017	0.5	Pharan Burchfield	\$150.00	Finalize Ms. McLetchie's letter to Mr. Willick in response to Ms. Abrams' preservation/freeze letter.	\$75.00
2/3/2017	0.8	Pharan Burchfield	\$150.00	Attention to preservation and document collection issues per direction from Ms. McLetchie.	\$120.00
2/3/2017	0.3	Pharan Burchfield	\$150.00	Email and phone calls re scheduling.	\$45.00
2/4/2017	0.2	Margaret McLetchie	\$450.00	Call with client.	\$90.00
2/5/2017	0.2	Margaret McLetchie	\$450.00	Review and consider email from Mr. Willick.	\$90.00
2/6/2017	3.5	Leo Wolpert	\$175.00	Meet with Ms. McLetchie and review research provided. [no charge.] Read Ms. Abrams' Complaint, read all website materials, review research re Anti-SLAPP law and precedent.	\$612.50
2/6/2017	0.6	Margaret McLetchie	\$450.00	Work with team re preservation issues.	\$270.00
2/7/2017	4.9	Leo Wolpert	\$175.00	Draft outline of argument in Anti-SLAPP motion, draft statement of relevant facts pursuant to direction from Ms. McLetchie.	\$857.50
2/7/2017	0.1	Margaret McLetchie	\$450.00	Review documents.	\$45.00
2/7/2017	0.2	Pharan Burchfield	\$150.00	Draft memo re case documentation.	\$30.00
2/8/2017	1.5	Leo Wolpert	\$175.00	Research and draft public interest Weinberg test section of Anti-SLAPP motion to dismiss.	\$262.50

MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
2/8/2017	2.8	Leo Wolpert	\$175.00	Continue drafting Anti-SLAPP motion to dismiss.	\$490.00
2/9/2017	4.1	Leo Wolpert	\$175.00	Continue drafting Anti-SLAPP motion to dismiss, specifically public interest prong and good faith communications prong.	\$717.50
2/9/2017	0.8	Margaret McLetchie	\$450.00	Direct work on briefing: Motion to dismiss.	\$360.00
2/9/2017	0.1	Pharan Burchfield	\$150.00	Email communications to Mr. Sanson.	\$15.00
2/10/2017	2.2	Leo Wolpert	\$175.00	Continue Anti-SLAPP motion to dismiss.	\$385.00
2/11/2017	5.5	Leo Wolpert	\$175.00	Draft 12(b)(5) motion to dismiss.	\$962.50
2/12/2017	4	Leo Wolpert	\$175.00	Continue drafting motion to dismiss.	\$700.00
2/13/2017	6.8	Leo Wolpert	\$175.00	Continue drafting and editing 12(b)(5) motion to dismiss.	\$1,190.00
2/13/2017	0.6	Margaret McLetchie	\$450.00	Emails re issues pertaining to Ms. Abrams' efforts to interfere with VIPI Facebook. Research re counter-claims.	\$270.00
2/13/2017	0.9	Margaret McLetchie	\$450.00	Research. Work on motion to dismiss/ confer with Mr. Wolpert re same and check progress/ structure of brief. Update client.	\$405.00
2/14/2017	1	Margaret McLetchie	\$450.00	Direct research and writing of 12(b)(5) motion to dismiss.	\$450.00
2/14/2017	1	Margaret McLetchie	\$450.00	Review info from client re information on Mr. Willick's site. Research regarding anti-SLAPP motions.	\$450.00
2/15/2017	1.8	Leo Wolpert	\$175.00	Craft motion to strike.	\$315.00
2/15/2017	5.3	Leo Wolpert	\$175.00	Craft and edit 12(b)(5) motion to dismiss.	\$927.50

MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
2/15/2017	8.5	Margaret McLetchie	\$450.00	Review related filings and drafts. Edit draft received from Mr. Wolpert and organize brief sections. Draft sections re court access and injunctive relief. Edit and expand introduction and fact section and begin editing defamation section. Research additional section re attorney's fees and sanctions and motion to strike.	\$3,825.00
2/16/2017	9.1	Alina Shell	\$350.00	Attention to Motion to Dismiss: edit / expand section re defamation per Ms. McLetchie's request. Draft separate section regarding sanctions. Edit motion to strike. Supervise finalization of tables and filing.	\$3,185.00
2/16/2017	0.8	Gabriel Czop	\$100.00	Begin legal cite checking the Motion to Dismiss.	\$80.00
2/16/2017	8.2	Leo Wolpert	\$175.00	Draft and edit RICO section of motion to dismiss, draft and edit motion to dismiss generally.	\$1,435.00
2/16/2017	2.1	Leo Wolpert	\$175.00	Draft motion to strike.	\$367.50
2/16/2017	0.3	Margaret McLetchie	\$450.00	Review correspondence.	\$135.00
2/16/2017	8.2	Margaret McLetchie	\$450.00	Revisions to response to motion to dismiss (False light, emotional distress claims, legal standard, and brief in its entirety). Draft new section re general failure to plead with specificity/ Research re lack of corp. standing to pursue emotional distress and false light claims. Meet with Mr. Sanson.	\$3,690.00
2/16/2017	0.2	Pharan Burchfield	\$150.00	Attention to documentation and files.	\$30.00

MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
2/16/2017	4.5	Pharan Burchfield	\$150.00	Draft Motion for Leave to Exceed Page Limits for attorneys' review. File and serve/mail re same. Finalize Motion to Dismiss (create table of contents and table of authorities); file and serve/mail re same. Finalize Motion to Strike; file and serve/mail re same.	\$675.00
2/17/2017	0.2	Margaret McLetchie	\$450.00	Conferences re case status.	\$90.00
2/17/2017	0.4	Pharan Burchfield	\$150.00	Check file; calendaring.	\$60.00
2/25/2017	2.3	Leo Wolpert	\$175.00	Continue drafting/editing Anti-SLAPP motion to dismiss.	\$402.50
2/27/2017	0.2	Margaret McLetchie	\$450.00	Review emails re status.	\$90.00
2/27/2017	0.5	Margaret McLetchie	\$450.00	Check file, docket, and upcoming dates.	\$225.00
3/1/2017	0.5	Margaret McLetchie	\$450.00	Research re protections for journalists.	\$225.00
3/2/2017	3.9	Leo Wolpert	\$175.00	Continue drafting anti-SLAPP motion to dismiss.	\$682.50
3/2/2017	0.4	Margaret McLetchie	\$450.00	Provide direction re work on Anti-SLAPP motion.	\$180.00
3/3/2017	0.9	Margaret McLetchie	\$450.00	Meeting with Steve; follow up with email to Steve.	\$405.00
3/6/2017	1.3	Leo Wolpert	\$175.00	Edit opposition to motion for order shortening time and, Mr. Sanson's declaration re same.	\$227.50
3/7/2017	0.5	Margaret McLetchie	\$450.00	Review response/ counter-motion. Follow up re transcription and striking Leavitt. Review email re calendaring.	\$225.00
3/7/2017	0.1	Pharan Burchfield	\$150.00	Call Veritext Legal Solutions re quote to transcribe audio re Saiter hearing to use as exhibit.	\$15.00

MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
3/7/2017	0.2	Pharan Burchfield	\$150.00	Review Opposition to Motion to Dismiss and Opposition to Motion to Strike with Counter motions for Attorneys' Fees; update and calculate calendar re same.	\$30.00
3/8/2017	1.1	Alina Shell	\$350.00	Per Ms. McLetchie's request, research regarding time for filing opposition to Anti-SLAPP motion. Draft memorandum re same.	\$385.00
3/8/2017	0.2	Margaret McLetchie	\$450.00	Research re burden plaintiff has in responding to Anti-SLAPP motion.	\$90.00
3/8/2017	1.6	Margaret McLetchie	\$450.00	Research re attorney's fees requested in counter motions.	\$720.00
3/8/2017	0.7	Margaret McLetchie	\$450.00	Attention to checking date calculations and to case management.	\$315.00
3/9/2017	0.1	Margaret McLetchie	\$450.00	Review notice of reassignment. Forward to client.	\$45.00
3/9/2017	0.1	Margaret McLetchie	\$450.00	Attention to obtaining exhibits for use in anti-SLAPP motion.	\$45.00
3/9/2017	1	Margaret McLetchie	\$450.00	Review research re "SLAPP back" provisions of NRS 41.670 and research various procedural matters.	\$450.00
3/11/2017	0.2	Margaret McLetchie	\$450.00	Attention to obtaining Saiter transcript.	\$90.00
3/13/2017	0.7	Admin Admin	\$25.00	Dropped off flash drive to be transcribed at Veritext: 2250 S Rancho Drive Suite 195	\$17.50
3/13/2017	0.2	Margaret McLetchie	\$450.00	Rule 11/sanctions research.	\$90.00
3/13/2017	0.3	Margaret McLetchie	\$450.00	Review filings from Willick case.	\$135.00
3/13/2017	0.2	Margaret McLetchie	\$450.00	Follow up re obtaining transcript from Saiter case.	\$90.00
3/13/2017	0.1	Pharan Burchfield	\$150.00	Call to client.	\$15.00

MCLETCHIE SHELL

Date	Time Expended	Billor	Rate	Description	Total
3/13/2017	0.1	Pharan Burchfield	\$150.00	Complete order form for transcription re Saiter divorce hearing with Veritext Legal Solutions.	\$15.00
3/14/2017	0.2	Margaret McLetchie	\$450.00	Research re Rule 11 sanctions.	\$90.00
3/16/2017	0.3	Alina Shell	\$350.00	Assist in preparation of Anti-SLAPP motion and supporting documents. Edit draft declaration of Steve Sanson.	\$105.00
3/16/2017	0.8	Gabriel Czop	\$100.00	Research for Ms. McLetchie re: applicable test in anti-SLAPP motions and whether public interest is the same as public concern.	\$80.00
3/17/2017	0.4	Gabriel Czop	\$100.00	Research anti-SLAPP statute and finish writing footnote comparing NV and CA statutes.	\$40.00
3/19/2017	2.3	Leo Wolpert	\$175.00	Edit anti-SLAPP motion to dismiss.	\$402.50
3/20/2017	1.9	Alina Shell	\$350.00	Edit declaration in support of Anti-SLAPP motion. Per Ms. McLetchie's request, edit Anti-SLAPP motion.	\$665.00
3/20/2017	3.0	Margaret McLetchie	\$450.00	Direct work on Anti-SLAPP motion; review and revise drafts.	\$1,350.00
3/20/2017	0.7	Alina Shell	\$350.00	Draft additional section for Anti-SLAPP regarding historical background re opening proceedings.	\$245.00
3/20/2017	3.9	Leo Wolpert	\$175.00	Continue editing anti-SLAPP motion to dismiss.	\$682.50
3/20/2017	0.8	Leo Wolpert	\$175.00	Edit Mr. Sanson's declaration for inclusion with anti-SLAPP motion to dismiss.	\$140.00
3/21/2017	1.1	Alina Shell	\$350.00	Edit most recent draft of Steve Sanson declaration. Review exhibits to declaration with Ms. Burchfield to address gaps and errors. Discuss same with Ms. McLetchie and Mr. Wolpert.	\$385.00
3/21/2017	3.2	Margaret McLetchie	\$450.00	Continued work on anti-SLAPP motion.	\$1,440.00
3/21/2017	2.8	Leo Wolpert	\$175.00	Continue editing anti-SLAPP motion to dismiss, implementing Ms. McLetchie comments.	\$490.00

MCLETCHIESHELL

Date	Time Expended	Billor	Rate	Description	Total
3/21/2017	3	Leo Wolpert	\$175.00	Cite check and edit anti-SLAPP motion to dismiss.	\$525.00
3/21/2017	0.4	Pharan Burchfield	\$150.00	Prepare exhibits in support of Anti-SLAPP motion to dismiss.	\$60.00
3/27/2017	2	Leo Wolpert	\$175.00	Edit anti-SLAPP motion to dismiss.	\$350.00
3/28/2017	0.1	Alina Shell	\$350.00	Assist with finding full case cites for inclusion in anti-SLAPP motion.	\$35.00
3/28/2017	3.4	Margaret McLetchie	\$450.00	Revisions to Anti-SLAPP Motion.	\$1,530.00
3/28/2017	0.2	Alina Shell	\$350.00	Locate template motion to file under seal for Mr. Wolpert to use in drafting motion to dismiss. Review and respond to email from Ms. McLetchie regarding issues pertaining to anti-SLAPP motions.	\$70.00
3/28/2017	2.3	Gabriel Czop	\$100.00	Review and cite check Special Motion to Dismiss pursuant to Nev. Rev. Stat. 41.660	\$230.00
3/28/2017	2.5	Leo Wolpert	\$175.00	Edit anti-SLAPP motion to dismiss and draft motion to file under seal.	\$437.50
3/28/2017	5.1	Pharan Burchfield	\$150.00	Finalize exhibits and declarations re Anti-SLAPP motion. Prepare motion to file exhibit 13 under seal. Prepare table of contents and table of authorities re same. File and serve/mail Anti-SLAPP motion, motion to file under seal (exhibit 13) and declarations.	\$765.00
3/30/2017	2.3	Leo Wolpert	\$175.00	Begin drafting replies to oppositions to motion to dismiss and motion to strike	\$402.50
3/30/2017	0.1	Pharan Burchfield	\$150.00	Review recent pleadings in Abrams v. Schneider matter; calendar accordingly; email file-stamped copies to client.	\$15.00
3/31/2017	2.5	Leo Wolpert	\$175.00	Continue drafting reply to opposition to motion to dismiss.	\$437.50
4/4/2017	4.3	Leo Wolpert	\$175.00	Confer with Ms. McLetchie re reply to opposition to motion to dismiss; continue drafting reply.	\$752.50

MCLETCHE SHELL

Date	Time Expended	Biller	Rate	Description	Total
4/4/2017	0.1	Margaret McLetchie	\$450.00	Check status of filings.	\$45.00
4/4/2017	0.2	Margaret McLetchie	\$450.00	Respond to client inquiry.	\$90.00
4/4/2017	0.4	Margaret McLetchie	\$450.00	Direct work on reply.	\$180.00
4/5/2017	0.5	Leo Wolpert	\$175.00	Additional attention to reply to opposition to motion to dismiss.	\$87.50
4/5/2017	0.2	Margaret McLetchie	\$450.00	Check deadline for plaintiffs to respond to anti-SLAPP motion.	\$90.00
4/8/2017	0.9	Leo Wolpert	\$175.00	Continue drafting reply to opposition to motion to dismiss.	\$157.50
4/13/2017	0.8	Leo Wolpert	\$175.00	Continue drafting reply to opposition to motion to dismiss.	\$140.00
4/14/2017	0.2	Margaret McLetchie	\$450.00	Attention to SAO; review same and emails with opposing counsel; update to client.	\$90.00
5/7/2017	2.5	Leo Wolpert	\$175.00	Review opposition to anti-SLAPP motion to dismiss, research regarding counter-arguments.	\$437.50
5/7/2017	0.4	Margaret McLetchie	\$450.00	Attention to work on reply to omnibus opposition.	\$180.00
5/10/2017	3.5	Leo Wolpert	\$175.00	Research and draft motion to dismiss appeal.	\$612.50
5/24/2017	1.2	Leo Wolpert	\$175.00	Research and draft reply to non-opposition to motion to seal.	\$210.00
5/25/2017	0.7	Alina Shell	\$350.00	Edit request to unseal Exhibit 13 to anti-SLAPP motion to dismiss.	\$245.00
5/25/2017	2.7	Alina Shell	\$350.00	Read Anti-SLAPP opposition. Review cases cited in opposition and research additional cases. Begin drafting reply.	\$945.00
5/25/2017	2.3	Leo Wolpert	\$175.00	Continue working on reply to opposition to 12b5 motion to dismiss (1.5), rewrite reply to non-opposition to seal (.75)	\$402.50

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * * *

JENNIFER V. ABRAMS and
THE ABRAMS & MAYO LAW FIRM,

Appellant,

vs.

LOUIS C. SCHNEIDER; LAW OFFICES
OF LOUIS C. SCHNEIDER, LLC; STEVE
W. SANSON; VETERANS IN
POLITICS INTERNATIONAL, INC;

Respondent.

SC NO: 75838/75834
DC NO: A-17-749318-C
Electronically Filed
Oct 15, 2018, 09:57 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

**APPELLANT'S
INDEX TO
APPENDIX -
DATE ORDER
VOLUME VII**

Attorneys for Appellant:

Marshal S. Willick, Esq.
Nevada Bar No. 2515
WILLICK LAW GROUP
3591 East Bonanza Road, Suite 200
Las Vegas, Nevada 89110-2101
(702) 438-4100
Email: email@willicklawgroup.com

Dennis L. Kennedy, Esq.
Nevada Bar No. 1462
Joshua P. Gilmore, Esq.
Nevada Bar No. 11576
8984 Spanish Ridge Aveue
Las Vegas, Nevada 89148
(702)562-8820
Email: Dkennedy@BaileyKennedy.com
Jgilmore@BaileyKennedy.com

Attorneys for Respondent:

Maggie McLetchie, Esq.
Nevada Bar No. 10931
MCLETCHIE SHELL LLC
701 E Bridger Avenue, #520,
Las Vegas, Nevada 89101
(702)728-5300
Email: maggie@nvlitigation.com
Attorney for *Sanson Parties*

Joseph W. Houston, Esq.
Nevada Bar No. 1440
430 S. Seventh St.
Las Vegas, Nevada 89101
(702)982-1200
Email: jwh7408@yahoo.com
Attorney for *Schneider Parties*

APPENDIX INDEX

#	DOCUMENT	FILE STAMP DATE	PAGES
Volume I			
1.	Complaint for Damages	1/9/2017	JVA00001 - JVA000080
2.	Declaration of Service	1/13/2017	JVA00081
3.	Declaration of Service	1/13/2017	JVA00082
4.	Declaration of Service	1/13/2017	JVA00083
5.	Declaration of Service	1/25/2017	JVA00084
6.	Amended Complaint for Damages	1/27/2017	JVA000085- JVA000164
7.	Defendant Louis Schneider's and Law Offices of Louis Schneider's Motion to Dismiss Plaintiffs' Complaint Pursuant to NRCP 12(b)(5)	1/30/2017	JVA000165 - JVA000177
8.	Declaration of Service	2/8/2017	JVA000178
9.	Declaration of Service	2/8/2017	JVA000179
10.	Declaration of Service	2/8/2017	JVA000180
11.	Declaration of Service	2/8/2017	JVA000181
12.	Opposition to "Defendant Louis Schneider's and Law Offices of Louis Schneider's Motion to Dismiss Plaintiffs' Complaint Pursuant to NRCP 12(b)(5)" and Countermotion for Attorney's Fees	2/14/2017	JVA000182 - JVA000204
Volume II			
13.	Notice of Motion to Dismiss; Memorandum of Points and Authorities in Support Thereof	2/16/2017	JVA000205 - JVA000265
14.	Motion to Strike	2/16/2017	JVA000266 - JVA000273

15.	Opposition to “Defendants Steve Sanson and Veterans in Politics International, Inc’s Motion to Dismiss” and Countermotion for Attorney’s Fees	3/6/2017	JVA000274 - JVA000315
16.	Opposition to “Motion to Strike” and Countermotion for Attorney’s Fees	3/6/2017	JVA000317 - JVA000330
17.	Errata to Opposition to “Defendants Steve W. Sanson and Veterans in Politics International, Inc’s Motion to Dismiss” and Countermotion for Attorney’s Fees	3/6/2017	JVA000331 - JVA000336
18.	Schneider Defendants’ Special Motion to Dismiss Plaintiffs’ Slapp Suit Pursuant to NRS 41.660 and Request for Attorney’s Fees, Costs, and Damages Pursuant to NRS 41.670	3/28/2017	JVA000337 - JVA000367
19.	Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp)	3/28/2017	JVA000368 - JVA000405
	Volume III		
20.	Declaration of Steve Sanson in Support of Special Anti-Slapp Motion to Dismiss	3/28/2017	JVA000406 - JVA000469
21.	Declaration of Margaret A. McLetchie in Support of Special Anti-Slapp Motion to Dismiss	3/28/2017	JVA000470 - JVA000538
	Volume IV		
22.	Exhibit 13 to Declaration of Margaret A. McLetchie in Support of Special Anti-Slapp Motion to Dismiss - Sealed	3/28/2017	JVA000539 - JVA000655

	Volume V		
23.	Plaintiffs' Omnibus Opposition To: 1. Schneider Defendants' Special Motion to Dismiss Plaintiffs' Slapp Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670; 2. Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and 3. Defendants' Special Motion to Dismiss Under Nevada's Anti Slapp Statute, NRS 41.660	4/28/2017	JVA000656 - JVA000804
24.	Defendants' Steve W. Sanson and Veterans in Politics International, Inc.'s Request to Unseal Exhibit 13 to Their Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp)	5/26/2017	JVA000805 - JVA000808
25.	Reply to Plaintiffs' Opposition to Motion to Strike and Opposition to Plaintiffs' Countermotion for Attorney's Fees	5/30/2017	JVA000809 - JVA000817
26.	VIPI Defendants' Omnibus Reply to: (1) Plaintiffs' Opposition to Special motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and (2) Plaintiffs' Opposition to Motion to Dismiss and Countermotion for Attorneys' Fees	5/30/2017	JVA000818 - JVA000859
27.	Louis Schneiders Defendants' Joinder to Defendant Steve W. Sanson and VIPI Defendant's Reply to Plaintiffs' Opposition to Motion to Strike and Opposition to Plaintiffs' Countermotion for Attorney's Fees	6/1/2017	JVA000860 - JVA000862

28.	Plaintiffs' Supplement to Their Omnibus Opposition to: 1. Schneider Defendants' Special Motion to Dismiss Plaintiffs' SLAPP Suit Pursuant to NRS 41.660 and request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670; 2. Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and 3. Defendants' Special Motion to Dismiss Under Nevada's Anti Slapp Statute, NRS 41.660	6/6/2017	JVA000863 - JVA000866
29.	VIPI Defendants' Supplement to VIPI Defendants' Omnibus Reply to: (1) Plaintiffs' Opposition to Special motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and (2) Plaintiffs' Opposition to Motion to Dismiss and Countermotion for Attorneys' Fees	6/9/2017	JVA000867 - JVA000883
	Volume VI		
30.	Transcript Re: All Pending Motions	7/5/2017	JVA000884 - JVA000950
31.	[Proposed] Order Granting VIPI Defendants' Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-Slapp)	7/24/2017	JVA000951 - JVA000970
32.	Notice of Entry of Order	7/24/2017	JVA000971 - JVA000994
33.	Notice of Appeal	8/21/2017	JVA000995 - JVA000998
34.	Case Appeal Statement	8/21/2017	JVA000999 - JVA001004
35.	Schneider Defendants' Motion for Statutory Damages ad Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670; and Motion for Sanction	9/12/2017	JVA001005 - JVA001013
36.	Motion for Attorney Fees and Costs Pursuant to NEV. Rev. Stat. 41.670	9/13/2017	JVA001014 - JVA001076

37.	Notice of Change of Hearing	9/13/2017	JVA001077
38.	Louis Schneider Defendants' Joinder to Defendant Steve W. Sanson and VIPI Defendants' Motion for Attorney Fees and Costs Pursuant to Nev. Rev. Stat. 41.670	9/15/2017	JVA001078 - JVA001080
39.	Corrected Motion for Attorney Fees ad Costs and Additional Awards Pursuant to Nev. Rev. Stat. 41.670	10/5/2017	JVA001081 - JVA001143
Volume VII			
40.	Plaintiffs' Omnibus Opposition to Defendants' Motion for Attorney's Fees, Costs, and Sanctions	10/27/2017	JVA001144 - JVA001259
41.	Reply to Plaintiff's Opposition to an Award of Attorney's fees, Costs, and Statutory Sanctions	1/24/2018	JVA001260 - JVA001265
42.	Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program or, Alternatively, to a District Court Judge Outside of Clark County	1/24/2018	JVA001266 - JVA001370
43.	Affidavit of Counsel Cal J. Potter, IV. Esq.	1/26/2018	JVA001371 - JVA001383
44.	Opposition to Motion to Disqualify	1/31/2018	JVA001384 - JVA001393
Volume VIII			
45.	Affidavit of Judge Michelle Leavitt in Response to Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program Or, Alternatively, to a District Court Judge Outside of Clark County	2/2/2018	JVA001394 - JVA001397
46.	Reply to Plaintiffs' Opposition to Motion for Attorney Fees and Costs Pursuant to Nev. Rev. Stat. 41.670	2/5/2018	JVA001398 - JVA001451

47.	Court Minutes	2/7/2018	JVA001452
48.	Joinder to Louis Schneider's Opposition to Plaintiff's Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program or, Alternatively, to a District Court Judge Outside of Clark County	2/7/2018	JVA001453 - JVA001469
49.	Reply to Oppositions to Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program or, Alternatively, to a District Court Judge Outside of Clark County	2/23/2018	JVA001471 - JVA001539
50.	Court Minutes	3/2/2018	JVA001540
51.	Notice of Department Reassignment	3/5/2018	JVA001541
52.	Motion to Reconsider March 2, 2018 Minute Order Granting Plaintiffs' Motion to Disqualify	3/12/2018	JVA001542 - JVA001617
53.	Joinder in Motion for Reconsideration	3/13/2018	JVA001618 - JVA001620
54.	Opposition to "Motion to Reconsider March 2, 2018 Minute Order granting Plaintiffs' Motion to Disqualify" and Countermotion and Attorney's Fees	3/26/2018	JVA001621 - JVA001632
	Volume IX		
55.	Reply to Plaintiffs' Opposition to "Motion to Reconsider March 2, 2018 Minute Order granting Plaintiffs' Motion to Disqualify" and Countermotion and Attorney's Fees	4/10/2018	JVA001633 - JVA001663
56.	Notice of Hearing	4/18/2018	JVA001664 - JVA001665
57.	Court Minutes	4/20/2018	JVA001666 - JVA001667

58.	Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order	4/20/2018	JVA001668 - JVA001673
59.	Court Minutes	4/23/2018	JVA001674
60.	Order Granting Schneider Defendants' Special Motion to Dismiss Plaintiffs' SLAPP Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670	4/24/2018	JVA001675 - JVA001683
61.	Notice of Entry of Order Granting Schneider Defendants' Special Motion to Dismiss Plaintiffs' SLAPP Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670	4/24/2018	JVA001684 - JVA001695
62.	Notice of Appeal	5/7/2018	JVA001696 - JVA001698
63.	Opposition to "Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order" and Countermotion for Attorney's Fees	5/7/2018	JVA001699 - JVA001707
64.	Errata to Opposition to "Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order" and Countermotion for Attorney's Fees	5/8/2018	JVA001708 - JVA001712
65.	Case Appeal Statement	5/9/2018	JVA001713 - JVA001717
66.	Reply to Plaintiffs' Opposition to Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order and Opposition to Countermotion for Attorney's Fees	5/18/2018	JVA001718 - JVA001731
67.	Court Minutes	5/25/2018	JVA001732
68.	Order	7/2/2018	JVA001733 - JVA001735

69.	Notice of Entry of Order	8/1/2018	JVA001736 - JVA001741
70.	Declaration of Service	1/13/2017	JVA001742
71.	Declaration of Service	1/13/2017	JVA001743
72.	Declaration of Service	1/13/2017	JVA001744
73.	Declaration of Service	1/13/2017	JVA001745
74.	Declaration of Due Diligence	1/25/2017	JVA001746 - JVA001747
75.	Declaration of Service	2/8/2017	JVA001748
76.	Declaration of Service	2/8/2017	JVA001749
77.	Declaration of Service	2/8/2017	JVA001750
78.	Declaration of Service	2/8/2017	JVA001751
79.	Declaration of Service	2/10/2017	JVA001752
80.	Declaration of Service	3/29/2017	JVA001753
81.	Stipulation and Order to Dismiss with Prejudice All Claims Against Hanusa Parties	10/13/2017	JVA001754 - JVA001756
82.	Notice of Entry of Stipulation and Order to Dismiss with Prejudice All Claims Against Hanusa Parties	10/16/2017	JVA001757 - JVA001762

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * * *

JENNIFER V. ABRAMS AND
THE ABRAMS & MAYO LAW FIRM,

Appellant,

vs.

STEVE W. SANSON; VETERANS IN
POLITICS INTERNATIONAL, INC; LOUIS
C. SCHNEIDER; AND LAW OFFICES
OF LOUIS C. SCHNEIDER, LLC;

Respondent.

SC NO: 73838/75834
DC NO: A-17-749318-C

**APPELLANTS'
INDEX TO
APPENDIX -
ALPHABETICAL
ORDER**

Attorneys for Appellants:

Marshal S. Willick, Esq.
Nevada Bar No. 2515
WILLICK LAW GROUP
3591 East Bonanza Road, Suite 200
Las Vegas, Nevada 89110-2101
(702) 438-4100
Email: email@willicklawgroup.com

Dennis L. Kennedy, Esq.
Nevada Bar No. 1462
Joshua P. Gilmore, Esq.
Nevada Bar No. 11576
8984 Spanish Ridge Aveue
Las Vegas, Nevada 89148
(702)562-8820
Email: Dkennedy@BaileyKennedy.com
Jgilmore@BaileyKennedy.com

Attorneys for Respondents:

Maggie McLetchie, Esq.
Nevada Bar No. 10931
MCLETCHIE SHELL LLC
701 E Bridger Avenue, #520,
Las Vegas, Nevada 89101
(702)728-5300
Email: maggie@nvlitigation.com
Attorney for *Sanson Parties*

Joseph W. Houston, Esq.
Nevada Bar No. 1440
430 S. Seventh St.
Las Vegas, Nevada 89101
(702)982-1200
Email: jwh7408@yahoo.com
Attorney for *Schneider Parties*

APPENDIX INDEX

EXHIBIT	DOCUMENT	FILE STAMP DATE	PAGES
43.	Affidavit of Counsel Cal J. Potter, IV. Esq.	1/26/2018	JVA001371 - JVA001383
45.	Affidavit of Judge Michelle Leavitt in Response to Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program Or, Alternatively, to a District Court Judge Outside of Clark County	2/2/2018	JVA001394 - JVA001397
6.	Amended Complaint for Damages	1/27/2017	JVA000086- JVA000164
34.	Case Appeal Statement	8/21/2017	JVA000999 - JVA001004
65.	Case Appeal Statement	5/9/2018	JVA001713 - JVA001717
1.	Complaint for Damages	1/9/2017	JVA000001 - JVA000080
39.	Corrected Motion for Attorney Fees ad Costs and Additional Awards Pursuant to Nev. Rev. Stat. 41.670	10/5/2017	JVA001081 - JVA001143
47.	Court Minutes	2/7/2018	JVA001452
50.	Court Minutes	3/2/2018	JVA001540
57.	Court Minutes	4/20/2018	JVA001666 - JVA001667
59.	Court Minutes	4/23/2018	JVA001674
67.	Court Minutes	5/25/2018	JVA001732

74.	Declaration of Due Diligence	1/25/2017	JVA001746 - JVA001747
21.	Declaration of Margaret A. McLetchie in Support of Special Anti-Slapp Motion to Dismiss	3/28/2017	JVA000470 - JVA000538
2.	Declaration of Service	1/13/2017	JVA00082
3.	Declaration of Service	1/13/2017	JVA00083
4.	Declaration of Service	1/13/2017	JVA00084
70.	Declaration of Service	1/13/2017	JVA001742
71.	Declaration of Service	1/13/2017	JVA001743
72.	Declaration of Service	1/13/2017	JVA001744
73.	Declaration of Service	1/13/2017	JVA001745
5.	Declaration of Service	1/25/2017	JVA00085
8.	Declaration of Service	2/8/2017	JVA000178
9.	Declaration of Service	2/8/2017	JVA000179
10.	Declaration of Service	2/8/2017	JVA000180
11.	Declaration of Service	2/8/2017	JVA000181
75.	Declaration of Service	2/8/2017	JVA001748
76.	Declaration of Service	2/8/2017	JVA001749
77.	Declaration of Service	2/8/2017	JVA001750
78.	Declaration of Service	2/8/2017	JVA001751
79.	Declaration of Service	2/10/2017	JVA001752
80.	Declaration of Service	3/29/2017	JVA001753
20.	Declaration of Steve Sanson in Support of Special Anti-Slapp Motion to Dismiss	3/28/2017	JVA000406 - JVA000469

7.	Defendant Louis Schneider's and Law Offices of Louis Schneider's Motion to Dismiss Plaintiffs' Complaint Pursuant to NRCP 12(b)(5)	1/30/2017	JVA000165 - JVA000177
24.	Defendants' Steve W. Sanson and Veterans in Politics International, Inc.'s Request to Unseal Exhibit 13 to Their Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp)	5/26/2017	JVA000805 - JVA000808
17.	Errata to Opposition to "Defendants Steve W. Sanson and Veterans in Politics International, Inc's Motion to Dismiss" and Countermotion for Attorney's Fees	3/6/2017	JVA000331 - JVA000336
64.	Errata to Opposition to "Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order" and Countermotion for Attorney's Fees	5/8/2018	JVA001708 - JVA001712
22.	Exhibit 13 to Declaration of Margaret A. McLetchie in Support of Special Anti-Slapp Motion to Dismiss - Sealed	3/28/2017	JVA000539 - JVA000655
48.	Joinder to Louis Schneider's Opposition to Plaintiff's Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program or, Alternatively, to a District Court Judge Outside of Clark County	2/7/2018	JVA001453 - JVA001469
53.	Joinder in Motion for Reconsideration	3/13/2018	JVA001618 - JVA001620
38.	Louis Schneider Defendants' Joinder to Defendant Steve W. Sanson and VIPI Defendants' Motion for Attorney Fees and Costs Pursuant to Nev. Rev. Stat. 41.670	9/15/2017	JVA001078 - JVA001080

27.	Louis Schneider Defendants' Joinder to Defendant Steve W. Sanson and VIPI Defendants'Reply to Plaintiffs' Opposition to Motion to Strike and Opposition to Plaintiffs' Countermotion for Attorney's Fees	6/1/2017	JVA000860 - JVA000862
36.	Motion for Attorney Fees and Costs Pursuant to NEV. Rev. Stat. 41.670	9/13/2017	JVA001014 - JVA001076
42.	Motion to Disqualify Eighth Judicial District Court Elected Judiciary, and for Permanent Assignment to the Senior Judge Program or, Alternatively, to a District Court Judge Outside of Clark County	1/24/2018	JVA001266 - JVA001370
58.	Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order	4/20/2018	JVA001668 - JVA001673
52.	Motion to Reconsider March 2, 2018 Minute Order Granting Plaintiffs' Motion to Disqualify	3/12/2018	JVA001542 - JVA001617
14.	Motion to Strike	2/16/2017	JVA000266 - JVA000273
33.	Notice of Appeal	8/21/2017	JVA000995 - JVA000998
62.	Notice of Appeal	5/7/2018	JVA001696 - JVA001698
37.	Notice of Change of Hearing	9/13/2017	JVA001077
51.	Notice of Department Reassignment	3/5/2018	JVA001541
32.	Notice of Entry of Order	7/24/2017	JVA000971 - JVA000994
69.	Notice of Entry of Order	8/1/2018	JVA001736 - JVA001741

61.	Notice of Entry of Order Granting Schneider Defendants' Special Motion to Dismiss Plaintiffs' SLAPP Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670	4/24/2018	JVA001684 - JVA001695
82.	Notice of Entry of Stipulation and Order to Dismiss with Prejudice All Claims Against Hanusa Parties	10/16/2017	JVA001757 - JVA001762
56.	Notice of Hearing	4/18/2018	JVA001664 - JVA001665
16.	Notice of Motion to Dismiss; Memorandum of Points and Authorities in Support Thereof	2/16/2017	JVA000205 - JVA000265
68.	Order	7/2/2018	JVA001733 - JVA001735
60.	Order Granting Schneider Defendants' Special Motion to Dismiss Plaintiffs' SLAPP Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670	4/24/2018	JVA001675 - JVA001683
12.	Opposition to "Defendant Louis Schneider's and Law Offices of Louis Schneider's Motion to Dismiss Plaintiffs' Complaint Pursuant to NRCP 12(b)(5)" and Countermotion for Attorney's Fees	2/14/2017	JVA000182 - JVA000204
15.	Opposition to "Defendants Steve Sanson and Veterans in Politics International, Inc's Motion to Dismiss" and Countermotion for Attorney's Fees	3/6/2017	JVA000274 - JVA000315
44.	Opposition to Motion to Disqualify	1/31/2018	JVA001384 - JVA001393
54.	Opposition to "Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision and Order" and Countermotion for Attorney's Fees	5/7/2018	JVA001699 - JVA001707

43.	Opposition to "Motion to Reconsider March 2, 2018 Minute Order granting Plaintiffs' Motion to Disqualify" and Countermotion and Attorney's Fees	3/26/2018	JVA001621 - JVA001632
16.	Opposition to "Motion to Strike" and Countermotion for Attorney's Fees	3/6/2017	JVA000317 - JVA000330
23.	Plaintiffs' Omnibus Opposition To: 1. Schneider Defendants' Special Motion to Dismiss Plaintiffs' Slapp Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670; 2. Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and 3. Defendants' Special Motion to Dismiss Under Nevada's Anti Slapp Statute, NRS 41.660	4/28/2017	JVA000656 - JVA000804
40.	Plaintiffs' Omnibus Opposition to Defendants' Motion for Attorney's Fees, Costs, and Sanctions	10/27/2017	JVA001144 - JVA001259
28.	Plaintiffs' Supplement to Their Omnibus Opposition to: 1. Schneider Defendants' Special Motion to Dismiss Plaintiffs' SLAPP Suit Pursuant to NRS 41.660 and request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670; 2. Special Motion to Dismiss Pursuant to Nev. Rev. Stat. § 41.660 (Anti-Slapp); and 3. Defendants' Special Motion to Dismiss Under Nevada's Anti Slapp Statute, NRS 41.660	6/6/2017	JVA000863 - JVA000866
31.	[Proposed] Order Granting VIPI Defendants' Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-Slapp)	7/24/2017	JVA000951 - JVA000970