

1 **NOAS**
2 Willick Law Group
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9 Attorneys for *Plaintiff*

Electronically Filed
May 15 2018 02:18 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

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DISTRICT COURT
CLARK COUNTY, NEVADA

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

vs.

LOUIS SCHNEIDER; LAW OFFICES OF
LOUIS C. SCHNEIDER, LLC; STEVE W.
SANSON;; VETERANS IN POLITICS
INTERNATIONAL, INC; and DOES I
THROUGH X,

Defendant.

CASE NO: A-17-749318-C
DEPT. NO: I

DATE OF HEARING:
TIME OF HEARING:

NOTICE OF APPEAL

TO: STEVE W. SANSON, Defendant;

TO: LOUIS SCHNEIDER, ESQ., Defendant;

TO: MARGARET MCLECHIE, ESQ., attorney for Defendant, Steve Sanson; and

TO: JOSEPH HOUSTON, ESQ., attorney for Defendant, Louis Schneider;

NOTICE IS HEREBY GIVEN that the WILICK LAW GROUP, attorneys for Plaintiffs, Jennifer V. Abrams and the Abrams and Mayo Law Firm, hereby appeals to the Supreme Court of Nevada from the *Order Granting Schneider Defendants' Special Motion to Dismiss Pursuant to NEV. REV. STAT. 41.660 (Anti-Slapp) and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670* rendered by the District Court, Chief Judge, Elizabeth Gonzalez, and entered on the 24th day of April, 2018.

DATED this 7th day of May, 2018.

Respectfully Submitted By:
WILLICK LAW GROUP

MARSHAL S. WILLICK, ESQ.
Nevada Bar No. 2515
3591 East Bonanza Road, Suite 200
Las Vegas, NV 89110-2101
Attorneys for Plaintiff

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CERTIFICATE OF SERVICE

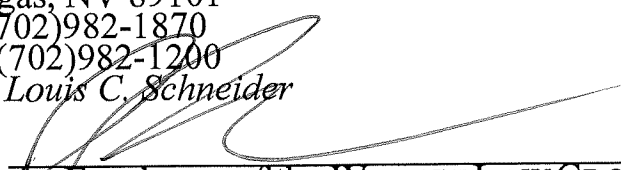
Pursuant to NRCP 5(b), I certify that I am an employee of the WILICK LAW GROUP and that on this 7th day of May, 2018, I caused the document entitled *Notice of Appeal* to be served as follows:

- ☒ Pursuant to EDCR 8.05(a), EDCR 8.05(f), NRCP 5(b)(2)(D) and Administrative Order 14-2 captioned "In the Administrative Matter of Mandatory Electronic Service in the Eighth Judicial District Court," by mandatory electronic service through the Eighth Judicial District Court's electronic filing system.
- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada.
- ☐ pursuant to EDCR 7.26, to be sent via facsimile, by duly executed consent for service by electronic means.
- ☐ pursuant to NRCP 5(b)(2)(D), by email by duly executed consent for service by electronic means.
- ☐ by hand delivery with signed Receipt of Copy.
- ☐ by First Class, Certified U.S. Mail.

To the attorney's listed below at the address, email address, and/or facsimile number indicated below:

Maggie McLetchie, Esq.
MCLECHIE SHELL LLC
701 E Bridger Avenue, #520,
Las Vegas, Nevada 89101
Attorney for *Steve W. Sanson* and
VETERANS IN POLITICS INTERNATIONAL, INC.

Joseph Houston, Esq.
430 S. 7th Street
Las Vegas, NV 89101
Fax: (702)982-1870
Phone: (702)982-1200
Attorney for *Louis C. Schneider*


An Employee of the WILICK LAW GROUP

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DEPARTMENT UNASSIGNED
CASE SUMMARY
CASE NO. A-17-749318-C

Jennifer Abrams, Plaintiff(s)
vs.
Louis Schneider, Defendant(s)

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§
§
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§
§

Location: Department Unassigned
Judicial Officer: Senior, Judge
Filed on: 01/09/2017
Case Number History:
Cross-Reference Case Number: A749318
Supreme Court No.: 73838

CASE INFORMATION

Case Type: **Intentional Misconduct**

Case Flags: **Appealed to Supreme Court**

DATE

CASE ASSIGNMENT

Current Case Assignment

Case Number	A-17-749318-C
Court	Department Unassigned
Date Assigned	04/24/2018
Judicial Officer	Senior, Judge

PARTY INFORMATION

Plaintiff	Abrams & Mayo Law Firm	Abrams, Jennifer V. <i>Retained</i> 702-222-4021(W)
	Abrams, Jennifer V	Abrams, Jennifer V. <i>Retained</i> 702-222-4021(W)
Defendant	Hanusa, Heidi J Removed: 10/13/2017 Dismissed	
	Law Offices of Louis C Schneider LLC Removed: 04/24/2018 Dismissed	
	Ortiz, Christina Removed: 10/13/2017 Dismissed	
	Sanson Corporation Removed: 10/13/2017 Dismissed	
	Sanson, Steve W Removed: 07/24/2017 Dismissed	
	Sanson, Steve W	McLetchie, Margaret A. <i>Retained</i> 702-728-5300(W)
	Schneider, Louis C	Houston, Joseph W., II <i>Retained</i> 702-982-1200(W)
	Spicer, Johnny Removed: 10/13/2017 Dismissed	

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Steelmon, Karen

Removed: 10/13/2017
Dismissed

Veterans in Politics International Inc

Removed: 07/24/2017
Dismissed











Veterans In Politics International Inc.

McLetchie, Margaret A.















Retained
702-728-5300(W)

Woolbright, Don

Removed: 10/13/2017
Dismissed

DATE	EVENTS & ORDERS OF THE COURT	INDEX
01/09/2017	 Complaint Filed By: Plaintiff Abrams, Jennifer V <i>Complaint for Damages</i>	
01/09/2017	 Initial Appearance Fee Disclosure Filed By: Plaintiff Abrams, Jennifer V <i>Initial Appearance Fee Disclosure (NRS Chapter 19)</i>	
01/13/2017	 Declaration Filed By: Plaintiff Abrams, Jennifer V <i>Declaration of Service</i>	
01/13/2017	 Declaration Filed By: Plaintiff Abrams, Jennifer V <i>Declaration of Service</i>	
01/13/2017	 Declaration Filed By: Plaintiff Abrams, Jennifer V <i>Declaration of Service</i>	
01/13/2017	 Declaration Filed By: Plaintiff Abrams, Jennifer V <i>Declaration of Service</i>	
01/13/2017	 Declaration Filed By: Plaintiff Abrams, Jennifer V <i>Declaration of Service</i>	
01/13/2017	 Declaration Filed By: Plaintiff Abrams, Jennifer V <i>Declaration of Service</i>	
01/13/2017	 Declaration Filed By: Plaintiff Abrams, Jennifer V <i>Declaration of Attempted Service</i>	
01/13/2017	 Declaration Filed By: Plaintiff Abrams, Jennifer V <i>Declaration of Service</i>	















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01/17/2017	 Peremptory Challenge Filed by: Plaintiff Abrams, Jennifer V <i>Peremptory Challenge of Judge</i>
01/17/2017	 Notice of Appearance Party: Defendant Ortiz, Christina <i>Notice of Appearance</i>
01/18/2017	 Initial Appearance Fee Disclosure Filed By: Defendant Ortiz, Christina <i>Initial Appearance Fee Disclosure (NRS Chapter 19)</i>
01/18/2017	 Notice of Appearance Party: Defendant Schneider, Louis C <i>Notice of Appearance</i>
01/18/2017	 Notice of Department Reassignment <i>Notice of Department Reassignment</i>
01/19/2017	 Certificate of Service Filed by: Plaintiff Abrams, Jennifer V <i>Certificate of Service</i>
01/19/2017	 Certificate of Service Filed by: Defendant Schneider, Louis C <i>Certificate of Service</i>
01/20/2017	 Notice of Department Reassignment <i>Notice of Department Reassignment</i>
01/24/2017	 Notice of Appearance Party: Plaintiff Abrams, Jennifer V <i>Notice of Appearance</i>
01/24/2017	 Initial Appearance Fee Disclosure Filed By: Defendant Veterans in Politics International Inc <i>Initial Appearance Fee Disclosure (NRS Chapter 19)</i>
01/24/2017	 Notice of Appearance Party: Defendant Sanson, Steve W <i>Notice of Appearance</i>
01/25/2017	 Certificate of Service Filed by: Plaintiff Abrams, Jennifer V <i>Certificate of Service</i>
01/25/2017	 Declaration Filed By: Plaintiff Abrams, Jennifer V <i>Declaration of Due Diligence</i>
01/25/2017	 Declaration Filed By: Plaintiff Abrams, Jennifer V <i>Declaration of Service</i>

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
01/26/2017	 Affidavit of Service Filed By: Plaintiff Abrams, Jennifer V <i>Affidavit of Service</i>
01/27/2017	 Amended Complaint Filed By: Plaintiff Abrams, Jennifer V <i>Amended Complaint for Damages</i>
01/27/2017	 Motion Filed By: Defendant Sanson, Steve W <i>Motion to Extend Pursuant to Nev. Rev. Stat. 41.660(6) and EDCR 2.25(a)</i>
01/30/2017	 Substitution of Attorney Filed by: Defendant Schneider, Louis C <i>Substitution of Attorney</i>
01/30/2017	 Motion to Dismiss Filed By: Defendant Schneider, Louis C <i>Defendant Louis Schneider's and Law Office of Louis Schneiders' Motion to Dimiss Complaint Pursuant to NRCP 12(b)(5)</i>
02/08/2017	 Declaration Filed By: Plaintiff Abrams, Jennifer V <i>Declaration of Service</i>
02/08/2017	 Declaration Filed By: Plaintiff Abrams, Jennifer V <i>Declaration of Service</i>
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02/08/2017	 Declaration Filed By: Plaintiff Abrams, Jennifer V <i>Declaration of Service</i>

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02/10/2017	 Declaration Filed By: Plaintiff Abrams, Jennifer V <i>Declaration of Service</i>
02/14/2017	 Opposition and Countermotion Filed By: Defendant Schneider, Louis C <i>(3/9/2017 See Errata) Opposition to "Defendant Louis Schneider's and Law Offices of Louis Schneider's Motion to Dismiss Complaint Pursuant to NRCP 12(B)(5)" and Countermotion for Attorney's Fees</i>
02/16/2017	 Motion for Leave to File Party: Defendant Sanson, Steve W <i>Motion for Leave to Exceed Page Limit for Their Motion to Dismiss</i>
02/16/2017	 Motion to Dismiss Filed By: Defendant Sanson, Steve W <i>Notice of Motion to Dismiss; Memorandum of Points and Authorities in Support Thereof</i>
02/16/2017	 Motion to Strike Filed By: Defendant Sanson, Steve W <i>Motion to Strike</i>
02/17/2017	 Notice of Appearance Party: Defendant Hanusa, Heidi J <i>Notice of Appearance</i>
02/17/2017	 Initial Appearance Fee Disclosure Filed By: Defendant Hanusa, Heidi J <i>Initial Appearance Fee Disclosure Pursuant to NRS 19</i>
03/03/2017	 Minute Order (10:00 AM) (Judicial Officer: Adair, Valerie)
03/06/2017	 Notice of Rescheduling <i>Notice Of Rescheduling Of Hearing</i>
03/06/2017	 Opposition to Motion to Dismiss Filed By: Plaintiff Abrams, Jennifer V <i>Opposition to "Defendants Steve W. Sanson and Veterans In Politics International, Inc's Motion to Dismiss" and Countermotion for Attorney's Fees</i>
03/06/2017	 Opposition and Countermotion Filed By: Plaintiff Abrams, Jennifer V <i>Opposition to "Motion to Strike" and Countermotion for Attorney's Fees</i>
03/08/2017	 Notice of Department Reassignment <i>Notice of Department Reassignment</i>
03/09/2017	 Errata Filed By: Plaintiff Abrams, Jennifer V <i>Errata to "Opposition to "Defendants Steve W. Sanson and Veterans in Politics International, Inc's Motion to Dismiss" and Countermotion for Attorney's Fees."</i>
03/16/2017	 Notice of Association of Counsel Filed By: Plaintiff Abrams, Jennifer V

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Notice of Association of Counsel

03/28/2017	 Motion to Dismiss Filed By: Defendant Schneider, Louis C <i>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</i>
03/28/2017	 Motion to Dismiss Filed By: Defendant Sanson, Steve W <i>Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP)</i>
03/28/2017	 Declaration Filed By: Defendant Sanson, Steve W <i>Declaration of Steve Sanson in Support of Special Anti-SLAPP Motion to Dismiss</i>
03/28/2017	 Declaration Filed By: Defendant Sanson, Steve W <i>Declaration of Margaret A. McLetchie in Support of Special Anti-SLAPP Motion to Dismiss</i>
03/28/2017	 Motion Filed By: Defendant Sanson, Steve W <i>Motion to File Under Seal</i>
03/29/2017	 Declaration Filed By: Plaintiff Abrams, Jennifer V <i>Declaration of Service</i>
03/31/2017	 Motion Filed By: Defendant Hanusa, Heidi J <i>Defendants' Special Motion to Dismiss Under Nevada's Anti-SLAPP statute, NRS 41.660</i>
04/19/2017	 Stipulation and Order Filed by: Plaintiff Abrams, Jennifer V <i>Stipulation and Order to Extend Briefing Schedule and Hearing Date on Pending Motions to Dismiss, Motion to Strike, and Motion to Seal</i>
04/20/2017	 Notice of Entry of Stipulation and Order Filed By: Plaintiff Abrams, Jennifer V <i>Notice of Entry of Stipulation and Order to Extend Briefing Schedule and Hearing Date on Pending Motions to Dismiss, Motion to Strike, and Motion to Seal</i>
04/28/2017	 Motion for Leave to File Party: Plaintiff Abrams, Jennifer V <i>Plaintiffs' Motion For Leave To Exceed Page Limit For 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</i>
04/28/2017	 Opposition Filed By: Plaintiff Abrams, Jennifer V <i>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</i>

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05/03/2017	 Notice of Hearing Filed By: Plaintiff Abrams, Jennifer V <i>Notice of Hearing on Plaintiffs' Motion for Leave to Exceed Page Limit for Their Omnibus Opposition to 1) Schneider Defendants' Special Motion to Dismiss Plaintiffs' Slapp Suit per NRS 41.660; 2) Special Motion to Dismiss per 41.660 (Anti-Slapp); and 3) Defendants' Special Motion to Dismiss Under Nevada's Anti-Slapp Statute per 41.660</i>
05/04/2017	 Notice of Change of Hearing <i>Notice of Change of Hearing</i>
05/26/2017	 Request Filed by: Defendant Sanson, Steve W <i>Defendants Steve W. Sanson and Veterans in Politics International, Inc.'s Request to Unseal Exhibit 13 o Their Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (anti-SLAPP)</i>
05/30/2017	 Motion for Leave to File Party: Defendant Sanson, Steve W; Defendant Veterans in Politics International Inc <i>Defendants Steven W. Sanson and Veterans in Politics International, Inc.'s Motion for Leave to Exceed Page Limit for Their 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</i>
05/30/2017	 Reply to Opposition Filed by: Defendant Sanson, Steve W; Defendant Veterans in Politics International Inc <i>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</i>
05/30/2017	 Reply to Opposition Filed by: Defendant Sanson, Steve W; Defendant Veterans in Politics International Inc <i>Reply to Plaintiffs' Opposition to Motion to Strike and Opposition to Plaintiff's Countermotion for Attorney's Fees</i>
06/01/2017	 Joinder Filed By: Defendant Schneider, Louis C <i>Louis Schneider Defendants' Joinder to Defendant Steve W. Sanson and VIPI Defendant s Reply to Plaintiffs Opposition to Motion to Strike and Opposition to Plaintiffs Counter Motion for Attorney s Fees</i>
06/05/2017	Motion to Dismiss (8:30 AM) (Judicial Officer: Leavitt, Michelle) <i>Defendant Louis Schneider's and Law Office of Louis Schneiders' Motion to Dismiss Complaint Pursuant to NRCP 12(b)(5)</i>
06/05/2017	Opposition and Countermotion (8:30 AM) (Judicial Officer: Leavitt, Michelle) <i>Opposition to "Defendant Louis Schneider's and Law Offices of Louis Schneider's Motion to Dismiss Complaint Pursuant to NRCP 12(B)(5)" and Countermotion for Attorney's Fees</i>
06/05/2017	Motion to Dismiss (8:30 AM) (Judicial Officer: Leavitt, Michelle) <i>Defendants' Notice of Motion to Dismiss; Memorandum of Points and Authorities in Support Thereof</i>
06/05/2017	Motion to Strike (8:30 AM) (Judicial Officer: Leavitt, Michelle) <i>Defendants' Motion to Strike</i>
06/05/2017	Opposition and Countermotion (8:30 AM) (Judicial Officer: Leavitt, Michelle) <i>Opposition to "Defendants Steve W. Sanson and Veterans In Politics International, Inc's Motion to Dismiss" and Countermotion for Attorney's Fees</i>

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06/05/2017	Opposition and Countermotion (8:30 AM) (Judicial Officer: Leavitt, Michelle) <i>Opposition to "Motion to Strike" and Countermotion for Attorney's Fees</i>
06/05/2017	Motion to Seal/Redact Records (8:30 AM) (Judicial Officer: Leavitt, Michelle) <i>Defendants' Motion to File Under Seal</i>
06/05/2017	Motion to Dismiss (8:30 AM) (Judicial Officer: Leavitt, Michelle) <i>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</i>
06/05/2017	Motion to Dismiss (8:30 AM) (Judicial Officer: Leavitt, Michelle) <i>Defendants' Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP)</i>
06/05/2017	Motion to Dismiss (8:30 AM) (Judicial Officer: Leavitt, Michelle) <i>Defendants' Special Motion to Dismiss Under Nevada's Anti-SLAPP statute, NRS 41.660</i>
06/05/2017	Motion (8:30 AM) (Judicial Officer: Leavitt, Michelle) <i>Notice of Hearing on Plaintiffs' Motion for Leave to Exceed Page Limit for Their Omnibus Opposition to 1) Schneider Defendants' Special Motion to Dismiss Plaintiffs' Slapp Suit per NRS 41.660; 2) Special Motion to Dismiss per 41.660 (Anti-Slapp); and 3) Defendants' Special Motion to Dismiss Under Nevada's Anti-Slapp Statute per 41.660</i>
06/05/2017	 All Pending Motions (8:30 AM) (Judicial Officer: Leavitt, Michelle)
06/06/2017	 Supplement to Opposition Filed By: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>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 NRS 41.660 (Anti-Slapp); and 3. Defendants' Special Motion to Dismiss Under Nevada's Anti-Slapp Statute, NRS 41.660</i>
06/09/2017	 Supplement to Response and Opposition Filed By: Defendant Sanson, Steve W; Defendant Veterans in Politics International Inc <i>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</i>
06/22/2017	 Minute Order (3:00 AM) (Judicial Officer: Leavitt, Michelle)
07/05/2017	 Recorders Transcript of Hearing <i>Recorder's Transcript Re: All Pending Motions, Monday, June 5, 2017</i>
07/24/2017	 Order Filed By: Defendant Sanson, Steve W; Defendant Veterans in Politics International Inc <i>Order Granting VIPI Defendants' Special Motion to Dismiss Pursuant to Nev. Rev. Stat. 41.660 (Anti-SLAPP)</i>
07/24/2017	 Notice of Entry of Order Filed By: Defendant Sanson, Steve W; Defendant Veterans in Politics International Inc <i>Notice of Entry of Order</i>
07/24/2017	Order of Dismissal (Judicial Officer: Leavitt, Michelle) Debtors: Jennifer V Abrams (Plaintiff), Abrams & Mayo Law Firm (Plaintiff) Creditors: Steve W Sanson (Defendant), Veterans in Politics International Inc (Defendant) Judgment: 07/24/2017, Docketed: 07/25/2017

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07/26/2017	 Stipulation and Order Filed by: Defendant Sanson, Steve W; Defendant Veterans In Politics International Inc. <i>Stipulation and Order</i>
07/26/2017	 Notice of Entry of Order Filed By: Defendant Sanson, Steve W; Defendant Veterans In Politics International Inc. <i>Notice of Entry of Order</i>
08/17/2017	 Stipulation and Order Filed by: Defendant Sanson, Steve W; Defendant Veterans In Politics International Inc. <i>Stipulation and Order</i>
08/17/2017	 Notice of Entry of Order Filed By: Defendant Sanson, Steve W; Defendant Veterans In Politics International Inc. <i>Notice of Entry of Order</i>
08/21/2017	 Notice of Appeal Filed By: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>Notice of Appeal</i>
08/21/2017	 Case Appeal Statement Filed By: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>Case Appeal Statement</i>
08/31/2017	 Stipulation and Order Filed by: Defendant Sanson, Steve W; Defendant Veterans In Politics International Inc. <i>Stipulation and Order</i>
08/31/2017	 Notice of Entry of Order Filed By: Defendant Sanson, Steve W; Defendant Veterans In Politics International Inc. <i>Notice of Entry of Order</i>
09/12/2017	 Motion for Attorney Fees and Costs Filed By: Defendant Law Offices of Louis C Schneider LLC <i>Schneider Defendants' Motion for Statutory Damages and Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670; and Motion for Sanctions</i>
09/13/2017	 Motion for Attorney Fees and Costs Filed By: Defendant Sanson, Steve W <i>Motion for Attorney Fees and Costs Pursuant to Nev. Rev. Stat. 41.670</i>
09/13/2017	 Notice of Change of Hearing <i>Notice of Change of Hearing</i>
09/15/2017	 Joinder To Motion Filed By: Defendant Law Offices of Louis C Schneider LLC <i>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</i>
10/05/2017	 Errata Filed By: Defendant Sanson, Steve W; Defendant Veterans In Politics International Inc. <i>Errata to Motion for Attorney Fees and Costs Pursuant to Nev. Rev. Stat. 41.670</i>
10/05/2017	 Motion for Attorney Fees and Costs

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CASE SUMMARY
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	Filed By: Defendant Sanson, Steve W; Defendant Veterans In Politics International Inc. <i>Corrected Motion for Attorney Fees and Costs and Additional Awards Pursuant to Nev. Rev. Stat. 41.670</i>
10/11/2017	 Substitution of Attorney Filed by: Defendant Schneider, Louis C; Defendant Law Offices of Louis C Schneider LLC <i>Substitution of Attorney</i>
10/13/2017	Order of Dismissal With Prejudice (Judicial Officer: Leavitt, Michelle) Debtors: Heidi J Hanusa (Defendant), Christina Ortiz (Defendant), Johnny Spicer (Defendant), Don Woolbright (Defendant), Sanson Corporation (Defendant), Karen Steelmon (Defendant) Creditors: Jennifer V Abrams (Plaintiff), Abrams & Mayo Law Firm (Plaintiff) Judgment: 10/13/2017, Docketed: 10/13/2017
10/13/2017	 Stipulation and Order Filed by: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>Stipulation and Order to Dismiss with Prejudice all Claims Against Hanusa Parties</i>
10/13/2017	 Stipulation and Order Filed by: Plaintiff Abrams, Jennifer V <i>Stipulation and Order to Extend Briefing Schedule and Hearing Date on Pending Motions for Attorneys' Fees, Costs, and Damages</i>
10/16/2017	 Notice of Entry of Stipulation and Order Filed By: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>Notice of Entry of Stipulation and Order to Extend Briefing Schedule and Hearing Date on Pending Motions for Attorneys' Fees, Costs, and Damages</i>
10/16/2017	 Notice of Entry of Stipulation and Order Filed By: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>Notice of Entry of Stipulation and Order to Dismiss with Prejudice All Claims Against Hanusa Parties</i>
10/27/2017	 Opposition to Motion Filed By: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>Plaintiffs' Omnibus Opposition to Defendants' Motions for Attorneys' Fees, Costs, and Sanctions</i>
12/11/2017	 Stipulation and Order Filed by: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>Stipulation and Order to Extend Briefing Schedule and Hearing Date on Pending Motions for Attorneys' Fees, Costs, and Damages</i>
12/11/2017	 Notice of Entry of Stipulation and Order Filed By: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>Notice of Entry of Stipulation and Order to Extend Briefing Schedule and Hearing Date on Pending Motions for Attorneys' Fees, Costs, and Damages</i>
01/24/2018	 Reply to Opposition Filed by: Defendant Schneider, Louis C; Defendant Law Offices of Louis C Schneider LLC <i>Reply to Plaintiffs' Opposition to an Award of Attorney Fees, Costs and Statutory Sanctions</i>
01/24/2018	 Motion to Disqualify Judge Filed By: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>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</i>

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CASE SUMMARY
CASE NO. A-17-749318-C

of Clark County

01/26/2018	 Affidavit Filed By: Defendant Law Offices of Louis C Schneider LLC <i>AFFIDAVIT OF CAL POTTER, IV, ESQ.</i>
01/31/2018	 Receipt of Copy Filed by: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm
01/31/2018	 Opposition to Motion Filed By: Defendant Schneider, Louis C <i>Opposition to Motion to Disqualify</i>
02/02/2018	 Affidavit <i>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</i>
02/05/2018	 Reply to Opposition <i>Reply to Plaintiffs' Opposition to Motion for Attorney Fees and Costs Pursuant to Nev. Rev. Stat. 41.670</i>
02/07/2018	 Minute Order (8:00 AM) (Judicial Officer: Leavitt, Michelle) <i>Minute Order regarding scheduled hearing for February 12, 2018 at 9:30 a.m.</i>
02/07/2018	 Joinder to Opposition to Motion Filed by: Defendant Sanson, Steve W; Defendant Veterans In Politics International Inc. <i>Joinder to Louis Schneider's Opposition to Plaintiffs' 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</i>
02/12/2018	CANCELED Motion for Attorney Fees and Costs (9:30 AM) (Judicial Officer: Leavitt, Michelle) <i>Vacated - per Judge Schneider Defendants' Motion for Statutory Damages and Attorneys' Fees, Costs, and Damages Pursuant to NRS 41.670; and Motion for Sanctions</i>
02/12/2018	CANCELED Motion for Attorney Fees and Costs (9:30 AM) (Judicial Officer: Leavitt, Michelle) <i>Vacated - per Judge Motion for Attorney Fees and Costs Pursuant to Nev. Rev. Stat. 41.670</i>
02/12/2018	CANCELED Joinder (9:30 AM) (Judicial Officer: Leavitt, Michelle) <i>Vacated - per Judge 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</i>
02/23/2018	 Reply Filed by: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>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</i>
03/02/2018	Motion to Disqualify Judge (3:00 AM) (Judicial Officer: Gonzalez, Elizabeth) <i>Plaintiffs' 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</i>

DEPARTMENT UNASSIGNED
CASE SUMMARY
CASE NO. A-17-749318-C

03/02/2018	Minute Order (2:58 PM) (Judicial Officer: Gonzalez, Elizabeth) <i>Minute Order re: Case Reassignment</i>
03/02/2018	 All Pending Motions (2:58 PM) (Judicial Officer: Gonzalez, Elizabeth)
03/05/2018	 Notice of Department Reassignment <i>Notice of Department Reassignment</i>
03/12/2018	 Motion to Reconsider Filed By: Defendant Sanson, Steve W; Defendant Veterans In Politics International Inc. <i>Motion to Reconsider March 2, 2018 Minute Order Granting Plaintiffs' Motion to Disqualify</i>
03/13/2018	 Joinder To Motion Filed By: Defendant Schneider, Louis C <i>Joinder in Motion for Reconsideration</i>
03/26/2018	 Opposition Filed By: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>Opposition to "Motion to reconsider March 2, 2018 Minute Order Granting Plaintiffs' Motion to Disqualify" and Countermotion for Attorney's Fees</i>
04/10/2018	 Reply to Opposition Filed by: Defendant Sanson, Steve W; Defendant Veterans In Politics International Inc. <i>Reply to Plaintiffs' Opposition to Motion to Reconsider March 2, 2018 Minute Order Granting Plaintiffs' Motion to Disqualify and Opposition to Plaintiffs' Motion for Attorney's Fees and Costs</i>
04/17/2018	Motion to Reconsider (9:00 AM) (Judicial Officer: Hardcastle, Kathy) <i>Motion to Reconsider March 2, 2018 Minute Order Granting Plaintiffs' Motion to Disqualify</i>
04/17/2018	Joinder (9:00 AM) (Judicial Officer: Hardcastle, Kathy) <i>Joinder in Motion for Reconsideration</i>
04/17/2018	Opposition and Countermotion (9:00 AM) (Judicial Officer: Hardcastle, Kathy) <i>Opposition to Motion to Reconsider March 2, 2018 Minute Order Granting Plaintiff's Motion to Disqualify and Countermotion for Attorney's Fees</i>
04/17/2018	All Pending Motions (9:00 AM) (Judicial Officer: Hardcastle, Kathy)
04/18/2018	 Notice of Hearing <i>Notice of Hearing</i>
04/20/2018	 Motion for Clarification (9:00 AM) (Judicial Officer: Hardcastle, Kathy)
04/20/2018	 Motion Filed By: Defendant Sanson, Steve W; Defendant Veterans In Politics International Inc. <i>Motion To Reassign Case to Judge Leavitt and Request for Written Order</i>
04/23/2018	 Minute Order (8:13 AM) (Judicial Officer: Hardcastle, Kathy) <i>Minute Order Re: Case Reassignment</i>
04/24/2018	Order of Dismissal (Judicial Officer: Senior, Judge) Debtors: Jennifer V Abrams (Plaintiff), Abrams & Mayo Law Firm (Plaintiff) Creditors: Louis C Schneider (Defendant), Law Offices of Louis C Schneider LLC (Defendant) Judgment: 04/24/2018, Docketed: 04/24/2018

DEPARTMENT UNASSIGNED
CASE SUMMARY
CASE NO. A-17-749318-C

04/24/2018	 Order Filed By: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>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</i>
04/24/2018	 Notice of Entry of Order Filed By: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>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</i>
05/07/2018	 Notice of Appeal Filed By: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>Notice of Appeal</i>
05/07/2018	 Opposition and Countermotion Filed By: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>Opposition to "Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision or Order" and Countermotion for Attorney's Fees</i>
05/08/2018	 Errata Filed By: Plaintiff Abrams, Jennifer V; Plaintiff Abrams & Mayo Law Firm <i>Errata to Opposition to "Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision or Order" and Countermotion for Attorney's Fees</i>
05/25/2018	Motion (3:00 AM) (Judicial Officer: Gonzalez, Elizabeth) <i>Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision or Order</i>
05/25/2018	Opposition and Countermotion (3:00 AM) (Judicial Officer: Gonzalez, Elizabeth) <i>Opposition to "Motion to Reassign Case to Judge Michelle Leavitt and Request for Written Decision or Order" and Countermotion for Attorney's Fees</i>

DATE	FINANCIAL INFORMATION																																								
	<table> <tr><td>Defendant Hanusa, Heidi J</td><td></td></tr> <tr><td>Total Charges</td><td>223.00</td></tr> <tr><td>Total Payments and Credits</td><td>223.00</td></tr> <tr><td>Balance Due as of 5/9/2018</td><td>0.00</td></tr> <tr><td>Defendant Law Offices of Louis C Schneider LLC</td><td></td></tr> <tr><td>Total Charges</td><td>30.00</td></tr> <tr><td>Total Payments and Credits</td><td>30.00</td></tr> <tr><td>Balance Due as of 5/9/2018</td><td>0.00</td></tr> <tr><td>Defendant Ortiz, Christina</td><td></td></tr> <tr><td>Total Charges</td><td>223.00</td></tr> <tr><td>Total Payments and Credits</td><td>223.00</td></tr> <tr><td>Balance Due as of 5/9/2018</td><td>0.00</td></tr> <tr><td>Defendant Sanson Corporation</td><td></td></tr> <tr><td>Total Charges</td><td>30.00</td></tr> <tr><td>Total Payments and Credits</td><td>30.00</td></tr> <tr><td>Balance Due as of 5/9/2018</td><td>0.00</td></tr> <tr><td>Defendant Sanson, Steve W</td><td></td></tr> <tr><td>Total Charges</td><td>223.00</td></tr> <tr><td>Total Payments and Credits</td><td>223.00</td></tr> <tr><td>Balance Due as of 5/9/2018</td><td>0.00</td></tr> </table>	Defendant Hanusa, Heidi J		Total Charges	223.00	Total Payments and Credits	223.00	Balance Due as of 5/9/2018	0.00	Defendant Law Offices of Louis C Schneider LLC		Total Charges	30.00	Total Payments and Credits	30.00	Balance Due as of 5/9/2018	0.00	Defendant Ortiz, Christina		Total Charges	223.00	Total Payments and Credits	223.00	Balance Due as of 5/9/2018	0.00	Defendant Sanson Corporation		Total Charges	30.00	Total Payments and Credits	30.00	Balance Due as of 5/9/2018	0.00	Defendant Sanson, Steve W		Total Charges	223.00	Total Payments and Credits	223.00	Balance Due as of 5/9/2018	0.00
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DEPARTMENT UNASSIGNED
CASE SUMMARY
CASE NO. A-17-749318-C

Defendant Spicer, Johnny	
Total Charges	30.00
Total Payments and Credits	30.00
Balance Due as of 5/9/2018	0.00
Defendant Steelmon, Karen	
Total Charges	30.00
Total Payments and Credits	30.00
Balance Due as of 5/9/2018	0.00
Defendant Veterans in Politics International Inc	
Total Charges	30.00
Total Payments and Credits	30.00
Balance Due as of 5/9/2018	0.00
Defendant Woolbright, Don	
Total Charges	30.00
Total Payments and Credits	30.00
Balance Due as of 5/9/2018	0.00
Defendant Schneider, Louis C	
Total Charges	223.00
Total Payments and Credits	223.00
Balance Due as of 5/9/2018	0.00
Plaintiff Abrams & Mayo Law Firm	
Total Charges	30.00
Total Payments and Credits	30.00
Balance Due as of 5/9/2018	0.00
Plaintiff Abrams, Jennifer V	
Total Charges	768.00
Total Payments and Credits	768.00
Balance Due as of 5/9/2018	0.00
Plaintiff Abrams, Jennifer V	
Appeal Bond Balance as of 5/9/2018	500.00

DISTRICT COURT CIVIL COVER SHEET

CLARK

County, Nevada

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

(Assigned by Clerk's Office)

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

Plaintiff(s) (name/address/phone): JENNIFER V. ABRAMS and THE ABRAMS & MAYO LAW FIRM 6252 S. Rainbow Blvd., Suite 100 Las Vegas, Nevada 89118 (702) 222-4021	Defendant(s) (name/address/phone): (See attached)
Attorney (name/address/phone): Jennifer V. Abrams, Esq. (NV Bar # 7575) 6252 S. Rainbow Blvd., Suite 100 Las Vegas, Nevada 89118 (702) 222-4021	Attorney (name/address/phone): Unknown

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

Civil Case Filing Types

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

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

01/09/2017

Date

Signature of initiating party or representative

See other side for family-related case filings

Defendants

LOUIS C. SCHNEIDER

Pers.: 808 San Gabriel Ave
Henderson, Nevada 89002

Bus.: 430 S. 7th Street
Las Vegas, Nevada 89101

LAW OFFICES OF LOUIS C. SCHNEIDER, LLC

Reg. Agent: c/o Philomena Moloney, Moloney & Associates CPA Firm
8905 W. Post Road, Ste. 210
Las Vegas, Nevada 89148

Business: 430 S. 7th Street
Las Vegas, Nevada 89101
Tel: (702) 435-2121

STEVE W. SANSON

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Las Vegas, Nevada 89143

Mailing: P.O. Box 28211
Las Vegas, Nevada 89126

HEIDI J. HANUSA

Pers.: 8908 Big Bear Pines Ave
Las Vegas, Nevada 89143

Bus.: 2620 Regatta Drive, Suite 102
Las Vegas, Nevada 89128

CHRISTINA ORTIZ

Pers.: 10632 Valley Edge Court
Las Vegas, Nevada 89141

JOHNNY SPICER

Pers.: 3589 East Gowan Road
Las Vegas, Nevada 89115

DON WOOLBRIGHT

Pers.: 4230 Saint Linus Ln.
Saint Ann, Missouri 63074

VETERANS IN POLITICS INTERNATIONAL, INC.

Reg. Agent: c/o Clark McCourt
7371 Prairie Falcon Road, Ste. 120
Las Vegas, Nevada 89128

SANSON CORPORATION

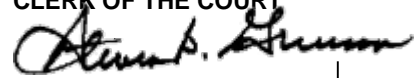
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7371 Prairie Falcon Road, Ste. 120
Las Vegas, Nevada 89128

KAREN STEELMON

2174 East Russell Road
Las Vegas, Nevada 89119

DOES I THROUGH X

(Unknown)



1 **ORDR**

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3 JOSHUA P. GILMORE (Nevada Bar No. 11576)

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8 Facsimile: 702.562.8821

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22 Telephone: 702.438.4100

23 Facsimile: 702.438.5311

24 Marshal@willicklawgroup.com

25 *Attorneys for Plaintiffs*

26 Jennifer V. Abrams and The Abrams & Mayo

27 Law Firm

28 **DISTRICT COURT**

CLARK COUNTY, NEVADA

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

Plaintiffs,

vs.

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

Defendants.

Case No. A-17-749318-C
Dept. No. SENIOR JUDGE PROGRAM

**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**

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

Schneider Defendants' Special Motion to Dismiss Plaintiffs' SLAPP¹ Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670 (the "Special Motion to Dismiss") having come on for hearing on June 5, 2017, the Honorable Michelle Leavitt presiding;² Plaintiffs Jennifer V. Abrams ("Ms. Abrams") and the Abrams & Mayo Law Firm (together, the "Abrams Parties"), appearing by and through their attorneys, Joshua P. Gilmore, Esq. of Bailey ♦ Kennedy and Marshal S. Willick, Esq. of Willick Law Group; Defendants Steve W. Sanson ("Sanson") and Veterans in Politics International, Inc. ("VIPI") (collectively, the "VIPI Defendants"), appearing by and through their attorneys, Margaret A. McLetchie, Esq. and Alina M. Shell, Esq. of McLetchie Shell LLC; and Defendants Louis C. Schneider, Esq. ("Schneider") and Law Office of Louis C. Schneider (together, the "Schneider Defendants"), appearing by and through their attorney, Cal Potter, Esq. of Potter Law Offices; and the Court, having read and considered all of the papers and pleadings on file, including the transcript from the June 5, 2017 hearing, and being fully advised, and good cause appearing therefor, hereby makes the following findings of fact and conclusions of law, and order granting the Schneider Defendants' Special Motion to Dismiss:

I.

FINDINGS OF FACT

1. Schneider is a licensed attorney in Las Vegas, Nevada.
2. On January 9, 2017, the Abrams Parties filed a Verified Complaint against the Schneider Defendants, as well as several other Defendants. The original Complaint included causes of action for defamation, intentional infliction of emotional distress, negligent infliction of emotional distress, false light, business disparagement, harassment, concert of action, civil conspiracy, RICO, and injunctive relief.
3. On January 27, 2017, the Abrams Parties filed a First Amended Verified Complaint, adding copyright infringement as a cause of action.

¹ "SLAPP" is an acronym for "strategic lawsuit against public participation."

² This matter was reassigned to the undersigned Senior Judge pursuant to the March 5, 2018 Notice of Department Reassignment.

3 5. On February 14, 2017, the Abrams Parties filed an Opposition to the Schneider
4 Defendants' 12(b)(5) Motion to Dismiss and Countermotion for Attorney's Fees.

5 6. On March 29, 2017, the Schneider Defendants filed the Special Motion to Dismiss.

7. On April 28, 2017, the Abrams Parties filed an Omnibus Opposition to a number of anti-SLAPP motions filed by the Defendants, including the Special Motion to Dismiss filed by the Schneider Defendants.

8. On June 5, 2017, the Court heard oral arguments on the Defendants' anti-SLAPP motions to dismiss, including the Special Motion to Dismiss filed by the Schneider Defendants. During the hearing, the Abrams Parties' counsel stated that the Schneider Defendants are alleged to be responsible for all acts committed by the VIPI Defendants based on the civil conspiracy claim. The Abrams Parties' counsel separately agreed to dismiss the harassment, RICO, injunctive relief, and copyright infringement claims pursuant to N.R.C.P. 12(b)(5). With that in mind, the Court considered whether the Abrams Parties met their burden (for purposes of the Schneider Defendants' Special Motion to Dismiss) with regard to the remaining claims in the First Amended Complaint (i.e., defamation, intentional infliction of emotional distress, negligent infliction of emotional distress, false light, business disparagement, concert of action, and civil conspiracy).

19 9. On June 6, 2017, the Abrams Parties filed a Supplement to their Omnibus Opposition
20 to the VIPI Defendants' Special Motion to Dismiss.

10. On June 22, 2017, the Court entered a minute order granting the Schneider' Defendants' Special Motion to Dismiss.

II.

CONCLUSIONS OF LAW

11. Nevada's Anti-SLAPP statute provides that if "an action is brought against a person based upon a good faith communication in furtherance of ... the right to free speech in direct connection with an issue of public concern, [t]he person against whom the action is brought may file a special motion to dismiss." NRS 41.660(1)(a).

1 12. Courts must evaluate a special anti-SLAPP motion to dismiss using a two-step
2 process. First, the defendant bears the burdens of persuasion and production: He must show by a
3 preponderance of the evidence that each of the plaintiff's claim "is based upon a good faith
4 communication in furtherance of the right to petition or the right to free speech in direct connection
5 with an issue of public concern." NRS 41.660(3)(a); *see also John v. Douglas County Sch. Dist.*,
6 125 Nev. 746, 754, 219 P.3d 1276, 1282 (2009).

7 13. Second, assuming that the defendant satisfies the aforementioned threshold
8 showing, a court must then "determine whether the plaintiff has demonstrated with prima facie
9 evidence a probability of prevailing on the claim[s]." NRS 41.660(3)(b).

10 14. NRS Section 41.637 defines a "good faith communication in furtherance of the right
11 to petition or the right to free speech in direct connection with an issue of public concern" in
12 pertinent part as follows:

13 Written or oral statement made in direct connection with an issue under consideration
14 by a legislative, executive or judicial body, or any other official proceeding
authorized by law; or

15 Communication made in direct connection with an issue of public interest in a place
16 open to the public or in a public forum,

17 ↳ which is truthful or is made without knowledge of its falsehood.

18 NRS 41.637(4).

19 15. In *Shapiro v. Welt*, 133 Nev., Adv. Op. 6, 389 P.3d 262 (2017), the Nevada
20 Supreme Court outlined the following guiding principles for determining what constitutes "public
21 interest" for purposes of NRS Section 41.637(4):

22 (1) "public interest" does not equate with mere curiosity;

23 (2) a matter of public interest should be something of concern to a substantial number
24 of people; a matter of concern to a speaker and a relatively small specific audience is
not a matter of public interest;

25 (3) there should be some degree of closeness between the challenged statements and
26 the asserted public interest—the assertion of a broad and amorphous public interest is
not sufficient;

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

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

3 *Shapiro*, 389 P.3d at 268.

4 ***The Schneider Defendants Met Their Initial Burden***

5 16. The Court finds that no statement at issue in this case was directly made by Mr.
6 Schneider. As noted above, the Abrams Parties seek to hold the Schneider Defendants liable for
7 statements made by the VIPI Defendants.

8 17. Having reviewed the communications at issue in the First Amended Verified
9 Complaint, the Court finds that the VIPI Defendants' statements concerning the Abrams Parties
10 arise from good faith communications in furtherance of the right to free speech in direct connection
11 with an issue of public concern.

12 18. Moreover, the Court finds that a majority of the statements at issue in this case took
13 place on the public forum of the internet – e.g., they were published on VIPI's website.

14 19. Finally, the Court finds that the statements at issue in this case were made without
15 knowledge of falsehood, or were statements of opinion which are incapable of being true or false.

16 ***The Abrams Parties Have Failed to Demonstrate a Probability of Success on Their Claims***

17 20. Because the Schneider Defendants met their burden, the burden now shifts to the
18 Abrams Parties to demonstrate "with prima facie evidence a probability of prevailing on the[ir
19 remaining] claims." NRS 41.660(3)(b).

20 21. The Abrams Parties have failed to meet their burden, as they cannot show a
21 probability of success on their remaining claims.

22 **Defamation**

23 22. In Nevada, the elements of a defamation claim are: (1) a false and defamatory
24 statement by a defendant concerning the plaintiff; (2) an unprivileged publication of this statement
25 to a third person; (3) fault of the defendant, amounting to at least negligence; and (4) actual or
26 presumed damages. *Pegasus v. Reno Newspapers, Inc.*, 118 Nev. 706, 718, 57 P.3d 82, 90 (2002).

1 23. The Schneider Defendants made none of the statements at issue in this case, and the
2 VIPI Defendants' statements consist of either opinions or facts. Thus, the Abrams Parties have not
3 established a probability of success on their defamation claim.

4 **Intentional Infliction of Emotional Distress**

5 24. The elements of a cause of action for intentional infliction of emotional distress
6 ("IIED") are: "(1) extreme and outrageous conduct with either the intention of, or reckless
7 disregard for, causing emotional distress, (2) the plaintiff's [sic] having suffered severe or extreme
8 emotional distress and (3) actual or proximate causation." *Dillard Dep't Stores, Inc. v. Beckwith*,
9 115 Nev. 372, 378, 989 P.2d 882, 886 (1999) (quoting *Star v. Rabello*, 97 Nev. 124, 125, 625 P.2d
10 90, 92 (1981)).

11 25. The Abrams Parties fail to allege facts sufficient to show that the Schneider
12 Defendants' conduct was "extreme and outrageous" or that the Abrams Parties suffered emotional
13 distress. Thus, the Abrams Parties have not established a probability of success on their IIED
14 claim.

15 **Negligent Infliction of Emotional Distress**

16 26. Nevada courts recognize that "the negligent infliction of emotional distress can be
17 an element of the damage sustained by the negligent acts committed directly against the victim-
18 plaintiff." *Shoen v. Amerco, Inc.*, 111 Nev. 735, 748, 896 P.2d 469, 477 (1995). Thus, a cause of
19 action for negligent infliction of emotional distress ("NIED") has essentially the same elements as
20 a cause of action for negligence: (1) duty owed by defendant to plaintiff, (2) breach of said duty by
21 defendant, (3) said breach is the direct and proximate cause of plaintiff's emotional distress, and
22 (4) damages (i.e., emotional distress).

23 27. The Abrams Parties fail to allege facts sufficient to show that the Schneider
24 Defendants owed Ms. Abrams or her law firm any duty of care. The Abrams Parties also fail to
25 allege facts sufficient to show that they suffered emotional distress. Thus, the Abrams Parties have
26 not established a probability of success on their NIED claim.

27
28

1 **False Light**

2 28. The false light tort requires that “(a) the false light in which the other was placed
3 would be highly offensive to a reasonable person, and (b) the actor had knowledge of or acted in
4 reckless disregard as to the falsity of the publicized matter and the false light in which the other
5 would be placed.” *Franchise Tax Bd. of Cal. v. Hyatt*, 130 Nev., Adv. Op. 71, 335 P.3d 125, 141
6 (2014) (quoting RESTATEMENT (SECOND) OF TORTS § 652E (1977)).

7 29. The Abrams Parties fail to allege facts sufficient to show that the Schneider
8 Defendants (or the VIPI Defendants) placed them in a false light that would be “highly offensive to
9 a reasonable person.” Furthermore, the Abrams Parties fail to allege facts sufficient to show that
10 they have suffered emotional distress from any of the Schneider Defendants’ actions, much less as
11 a result of being placed in a “false light.” Thus, the Abrams Parties have not established a
12 probability of success on their false light claim.

13 **Business Disparagement**

14 30. The elements of a business disparagement cause of action are: “(1) a false and
15 disparaging statement, (2) the unprivileged publication by the defendant, (3) malice, and (4) special
16 damages.” *Clark Cty. Sch. Dist. v. Virtual Educ. Software, Inc.*, 125 Nev. 374, 386, 213 P.3d 496,
17 504 (2009) (citing *Hurlbut v. Gulf Atlantic Life Ins. Co.*, 749 S.W.2d 762, 766 (Tex. 1987)).

18 31. The Abrams Parties cannot prevail on their business disparagement claim for the
19 same reason that their defamation claim fails. Thus, the Abrams Parties have not established a
20 probability of success on their business disparagement claim.

21 **Concert of Action**

22 32. The elements of a cause of action for concert of action are that two defendants
23 commit a tort while acting in concert or pursuant to a common design. *Dow Chemical Co. v.*
24 *Mahlum*, 114 Nev. 1468, 1488, 970 P.2d 98, 111 (1998). The plaintiff must also show that the
25 defendants “agreed to engage in conduct that is inherently dangerous or poses a substantial risk of
26 harm to others.” *Tai-Si Kim v. Kearney*, 838 F. Supp. 2d 1077, 1092 (D. Nev. 2012) (quoting *GES,*
27 *Inc. v. Corbitt*, 117 Nev. 265, 270-71, 21 P.3d 11, 14-15 (2001)).

1 33. The conduct alleged in this case is not inherently dangerous. Further, because the
2 other tort claims fail, so does this one.

3 **Civil Conspiracy**

4 34. The elements of a cause of action for civil conspiracy are: (1) defendants, "by some
5 concerted action, intend to accomplish an unlawful objective for the purpose of harming another;
6 and (2) damage resulting from the act(s). *Consol. Generator-Nevada, Inc. v. Cummins Engine Co.*,
7 114 Nev. 1304, 1311, 971 P.2d 1251, 1255 (1999) (quoting *Hilton Hotels v. Butch Lewis*
8 *Productions*, 109 Nev. 1043, 1048, 862 P.2d 1207, 1210 (1993)).

9 35. Because the other tort claims fail, so does this one.

10 **III.**

11 **ORDER**

12 36. Accordingly, for the reasons stated above, the Schneider Defendants' Special
13 Motion to Dismiss is GRANTED.

14 37. If a Court grants a special anti-SLAPP motion to dismiss, the defendants are entitled
15 to an award of reasonable costs and attorneys' fees. NRS 41.670(1)(a). A Court may also award
16 up to \$10,000.00. NRS 41.670(1)(b).

17 38. Additionally, upon the granting of a special anti-SLAPP motion to dismiss, the
18 defendants can bring a separate cause of action against the plaintiffs for compensatory damages,
19 punitive damages, and attorney's fees and costs of bringing the separate action. NRS 41.670(c).

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IT IS SO ORDERED this 20 day of April, 2018.

Ching  DISTRICT COURT JUDGE 

BAILEY ♦ KENNEDY

By:

AND

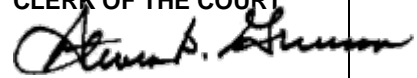
AND

Attorneys for Plaintiffs,

JENNIFER V. ABRAMS and
THE ABRAMS & MAYO LAW FIRM

BAILEY ♦ KENNEDY
 3984 SPANISH RIDGE AVENUE
 LAS VEGAS, NEVADA 89148-1302
 702.562.8820

(fn) The Chief Judge signs this for Sr. Judge K. Hardcastle pending decision by the parties related to the disclosure ^{Page 9 of 9} made on 20 April 2018.



NEOJ

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JOSHUA P. GILMORE (Nevada Bar No. 11576)

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Attorneys for Plaintiffs

Jennifer V. Abrams and The Abrams & Mayo Law
Firm

DISTRICT COURT

CLARK COUNTY, NEVADA

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

Plaintiffs,

vs.

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

Defendants.

Case No. A-17-749318-C
Dept. No. SENIOR JUDGE PROGRAM

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

PLEASE TAKE NOTICE that an 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 was entered on April 24, 2018; a true and correct copy of which is attached hereto.

DATED this 24th day of April, 2018.

BAILEY❖KENNEDY

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

AND

JENNIFER V. ABRAMS
THE ABRAMS & MAYO LAW FIRM
6252 South Rainbow Blvd., Ste. 100
Las Vegas, NV 89118

MARSHAL S. WILICK
WILICK LAW GROUP
3591 E. Bonanza Road
Las Vegas, NV 89110

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

CERTIFICATE OF SERVICE

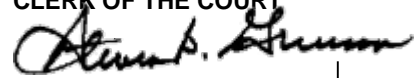
I certify that I am an employee of BAILEY❖KENNEDY and that on the 24th day of April, 2018, service of the foregoing Notice of Entry of Order Granting Schneider Defendants’ Special Motion to Dismiss Plaintiffs’ SLAPP Suit Pursuant to NRS 41.660 and Request for Attorney’s Fees, Costs, and Damages Pursuant to NRS 41.670 was made by mandatory electronic service through the Eighth Judicial District Court’s electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

MAGGIE MCLETHIE MCLETHIE SHELL LLC 701 E. Bridger Avenue, Ste. 520 Las Vegas, NV 89101	Email: maggie@nvlitigation.com <i>Attorneys for Defendants</i> STEVE W. SANSON and VETERANS IN POLITICS INTERNATIONAL, INC.
--	---

ALEX GHIBAUDO G LAW 703 S. 8 th Street Las Vegas, NV 89101	Email: alex@alexglaw.com <i>Attorneys for Defendants</i> LOUIS C. SCHNEIDER, LLC; LAW OFFICES OF LOUIS C. SCHNEIDER, LLC; CHRISTINA ORTIZ, HEIDI J. HANUSA, SANSON CORPORATION, JOHNNY SPICER, KAREN STEELMON, and DON WOOLBRIGHT
---	--

JOSEPH HOUSTON 430 S. 7 th Street Las Vegas, NV 89101	Email: <i>Attorneys for Defendant,</i> LOUIS C. SCHNEIDER
--	---

/s/ Susan Russo
Employee of BAILEY❖KENNEDY



1 **ORDR**

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24 Marshal@willicklawgroup.com

25 *Attorneys for Plaintiffs*

26 Jennifer V. Abrams and The Abrams & Mayo

27 Law Firm

28 **DISTRICT COURT**

CLARK COUNTY, NEVADA

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

Plaintiffs,

vs.

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

Defendants.

Case No. A-17-749318-C
Dept. No. SENIOR JUDGE PROGRAM

**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**

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

Schneider Defendants' Special Motion to Dismiss Plaintiffs' SLAPP¹ Suit Pursuant to NRS 41.660 and Request for Attorney's Fees, Costs, and Damages Pursuant to NRS 41.670 (the "Special Motion to Dismiss") having come on for hearing on June 5, 2017, the Honorable Michelle Leavitt presiding;² Plaintiffs Jennifer V. Abrams ("Ms. Abrams") and the Abrams & Mayo Law Firm (together, the "Abrams Parties"), appearing by and through their attorneys, Joshua P. Gilmore, Esq. of Bailey ♦ Kennedy and Marshal S. Willick, Esq. of Willick Law Group; Defendants Steve W. Sanson ("Sanson") and Veterans in Politics International, Inc. ("VIPI") (collectively, the "VIPI Defendants"), appearing by and through their attorneys, Margaret A. McLetchie, Esq. and Alina M. Shell, Esq. of McLetchie Shell LLC; and Defendants Louis C. Schneider, Esq. ("Schneider") and Law Office of Louis C. Schneider (together, the "Schneider Defendants"), appearing by and through their attorney, Cal Potter, Esq. of Potter Law Offices; and the Court, having read and considered all of the papers and pleadings on file, including the transcript from the June 5, 2017 hearing, and being fully advised, and good cause appearing therefor, hereby makes the following findings of fact and conclusions of law, and order granting the Schneider Defendants' Special Motion to Dismiss:

I.

FINDINGS OF FACT

1. Schneider is a licensed attorney in Las Vegas, Nevada.
2. On January 9, 2017, the Abrams Parties filed a Verified Complaint against the Schneider Defendants, as well as several other Defendants. The original Complaint included causes of action for defamation, intentional infliction of emotional distress, negligent infliction of emotional distress, false light, business disparagement, harassment, concert of action, civil conspiracy, RICO, and injunctive relief.
3. On January 27, 2017, the Abrams Parties filed a First Amended Verified Complaint, adding copyright infringement as a cause of action.

¹ "SLAPP" is an acronym for "strategic lawsuit against public participation."

² This matter was reassigned to the undersigned Senior Judge pursuant to the March 5, 2018 Notice of Department Reassignment.

3 5. On February 14, 2017, the Abrams Parties filed an Opposition to the Schneider
4 Defendants' 12(b)(5) Motion to Dismiss and Countermotion for Attorney's Fees.

5 6. On March 29, 2017, the Schneider Defendants filed the Special Motion to Dismiss.

6 7. On April 28, 2017, the Abrams Parties filed an Omnibus Opposition to a number of
7 anti-SLAPP motions filed by the Defendants, including the Special Motion to Dismiss filed by the
8 Schneider Defendants.

8. On June 5, 2017, the Court heard oral arguments on the Defendants' anti-SLAPP motions to dismiss, including the Special Motion to Dismiss filed by the Schneider Defendants. During the hearing, the Abrams Parties' counsel stated that the Schneider Defendants are alleged to be responsible for all acts committed by the VIPI Defendants based on the civil conspiracy claim. The Abrams Parties' counsel separately agreed to dismiss the harassment, RICO, injunctive relief, and copyright infringement claims pursuant to N.R.C.P. 12(b)(5). With that in mind, the Court considered whether the Abrams Parties met their burden (for purposes of the Schneider Defendants' Special Motion to Dismiss) with regard to the remaining claims in the First Amended Complaint (i.e., defamation, intentional infliction of emotional distress, negligent infliction of emotional distress, false light, business disparagement, concert of action, and civil conspiracy).

19 9. On June 6, 2017, the Abrams Parties filed a Supplement to their Omnibus Opposition
20 to the VIPI Defendants' Special Motion to Dismiss.

10. On June 22, 2017, the Court entered a minute order granting the Schneider' Defendants' Special Motion to Dismiss.

II.

CONCLUSIONS OF LAW

11. Nevada's Anti-SLAPP statute provides that if "an action is brought against a person based upon a good faith communication in furtherance of ... the right to free speech in direct connection with an issue of public concern, [t]he person against whom the action is brought may file a special motion to dismiss." NRS 41.660(1)(a).

1 12. Courts must evaluate a special anti-SLAPP motion to dismiss using a two-step
2 process. First, the defendant bears the burdens of persuasion and production: He must show by a
3 preponderance of the evidence that each of the plaintiff's claim "is based upon a good faith
4 communication in furtherance of the right to petition or the right to free speech in direct connection
5 with an issue of public concern." NRS 41.660(3)(a); *see also John v. Douglas County Sch. Dist.*,
6 125 Nev. 746, 754, 219 P.3d 1276, 1282 (2009).

7 13. Second, assuming that the defendant satisfies the aforementioned threshold
8 showing, a court must then "determine whether the plaintiff has demonstrated with prima facie
9 evidence a probability of prevailing on the claim[s]." NRS 41.660(3)(b).

10 14. NRS Section 41.637 defines a "good faith communication in furtherance of the right
11 to petition or the right to free speech in direct connection with an issue of public concern" in
12 pertinent part as follows:

13 Written or oral statement made in direct connection with an issue under consideration
14 by a legislative, executive or judicial body, or any other official proceeding
authorized by law; or

15 Communication made in direct connection with an issue of public interest in a place
16 open to the public or in a public forum,

17 ↳ which is truthful or is made without knowledge of its falsehood.

18 NRS 41.637(4).

19 15. In *Shapiro v. Welt*, 133 Nev., Adv. Op. 6, 389 P.3d 262 (2017), the Nevada
20 Supreme Court outlined the following guiding principles for determining what constitutes "public
21 interest" for purposes of NRS Section 41.637(4):

22 (1) "public interest" does not equate with mere curiosity;

23 (2) a matter of public interest should be something of concern to a substantial number
24 of people; a matter of concern to a speaker and a relatively small specific audience is
not a matter of public interest;

25 (3) there should be some degree of closeness between the challenged statements and
26 the asserted public interest—the assertion of a broad and amorphous public interest is
not sufficient;

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

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

3 *Shapiro*, 389 P.3d at 268.

4 ***The Schneider Defendants Met Their Initial Burden***

5 16. The Court finds that no statement at issue in this case was directly made by Mr.
6 Schneider. As noted above, the Abrams Parties seek to hold the Schneider Defendants liable for
7 statements made by the VIPI Defendants.

8 17. Having reviewed the communications at issue in the First Amended Verified
9 Complaint, the Court finds that the VIPI Defendants' statements concerning the Abrams Parties
10 arise from good faith communications in furtherance of the right to free speech in direct connection
11 with an issue of public concern.

12 18. Moreover, the Court finds that a majority of the statements at issue in this case took
13 place on the public forum of the internet – e.g., they were published on VIPI's website.

14 19. Finally, the Court finds that the statements at issue in this case were made without
15 knowledge of falsehood, or were statements of opinion which are incapable of being true or false.

16 ***The Abrams Parties Have Failed to Demonstrate a Probability of Success on Their Claims***

17 20. Because the Schneider Defendants met their burden, the burden now shifts to the
18 Abrams Parties to demonstrate "with prima facie evidence a probability of prevailing on the[ir
19 remaining] claims." NRS 41.660(3)(b).

20 21. The Abrams Parties have failed to meet their burden, as they cannot show a
21 probability of success on their remaining claims.

22 **Defamation**

23 22. In Nevada, the elements of a defamation claim are: (1) a false and defamatory
24 statement by a defendant concerning the plaintiff; (2) an unprivileged publication of this statement
25 to a third person; (3) fault of the defendant, amounting to at least negligence; and (4) actual or
26 presumed damages. *Pegasus v. Reno Newspapers, Inc.*, 118 Nev. 706, 718, 57 P.3d 82, 90 (2002).

1 23. The Schneider Defendants made none of the statements at issue in this case, and the
2 VIPI Defendants' statements consist of either opinions or facts. Thus, the Abrams Parties have not
3 established a probability of success on their defamation claim.

4 **Intentional Infliction of Emotional Distress**

5 24. The elements of a cause of action for intentional infliction of emotional distress
6 ("IIED") are: "(1) extreme and outrageous conduct with either the intention of, or reckless
7 disregard for, causing emotional distress, (2) the plaintiff's [sic] having suffered severe or extreme
8 emotional distress and (3) actual or proximate causation." *Dillard Dep't Stores, Inc. v. Beckwith*,
9 115 Nev. 372, 378, 989 P.2d 882, 886 (1999) (quoting *Star v. Rabello*, 97 Nev. 124, 125, 625 P.2d
10 90, 92 (1981)).

11 25. The Abrams Parties fail to allege facts sufficient to show that the Schneider
12 Defendants' conduct was "extreme and outrageous" or that the Abrams Parties suffered emotional
13 distress. Thus, the Abrams Parties have not established a probability of success on their IIED
14 claim.

15 **Negligent Infliction of Emotional Distress**

16 26. Nevada courts recognize that "the negligent infliction of emotional distress can be
17 an element of the damage sustained by the negligent acts committed directly against the victim-
18 plaintiff." *Shoen v. Amerco, Inc.*, 111 Nev. 735, 748, 896 P.2d 469, 477 (1995). Thus, a cause of
19 action for negligent infliction of emotional distress ("NIED") has essentially the same elements as
20 a cause of action for negligence: (1) duty owed by defendant to plaintiff, (2) breach of said duty by
21 defendant, (3) said breach is the direct and proximate cause of plaintiff's emotional distress, and
22 (4) damages (i.e., emotional distress).

23 27. The Abrams Parties fail to allege facts sufficient to show that the Schneider
24 Defendants owed Ms. Abrams or her law firm any duty of care. The Abrams Parties also fail to
25 allege facts sufficient to show that they suffered emotional distress. Thus, the Abrams Parties have
26 not established a probability of success on their NIED claim.

1 **False Light**

2 28. The false light tort requires that “(a) the false light in which the other was placed
3 would be highly offensive to a reasonable person, and (b) the actor had knowledge of or acted in
4 reckless disregard as to the falsity of the publicized matter and the false light in which the other
5 would be placed.” *Franchise Tax Bd. of Cal. v. Hyatt*, 130 Nev., Adv. Op. 71, 335 P.3d 125, 141
6 (2014) (quoting RESTATEMENT (SECOND) OF TORTS § 652E (1977)).

7 29. The Abrams Parties fail to allege facts sufficient to show that the Schneider
8 Defendants (or the VIPI Defendants) placed them in a false light that would be “highly offensive to
9 a reasonable person.” Furthermore, the Abrams Parties fail to allege facts sufficient to show that
10 they have suffered emotional distress from any of the Schneider Defendants’ actions, much less as
11 a result of being placed in a “false light.” Thus, the Abrams Parties have not established a
12 probability of success on their false light claim.

13 **Business Disparagement**

14 30. The elements of a business disparagement cause of action are: “(1) a false and
15 disparaging statement, (2) the unprivileged publication by the defendant, (3) malice, and (4) special
16 damages.” *Clark Cty. Sch. Dist. v. Virtual Educ. Software, Inc.*, 125 Nev. 374, 386, 213 P.3d 496,
17 504 (2009) (citing *Hurlbut v. Gulf Atlantic Life Ins. Co.*, 749 S.W.2d 762, 766 (Tex. 1987)).

18 31. The Abrams Parties cannot prevail on their business disparagement claim for the
19 same reason that their defamation claim fails. Thus, the Abrams Parties have not established a
20 probability of success on their business disparagement claim.

21 **Concert of Action**

22 32. The elements of a cause of action for concert of action are that two defendants
23 commit a tort while acting in concert or pursuant to a common design. *Dow Chemical Co. v.*
24 *Mahlum*, 114 Nev. 1468, 1488, 970 P.2d 98, 111 (1998). The plaintiff must also show that the
25 defendants “agreed to engage in conduct that is inherently dangerous or poses a substantial risk of
26 harm to others.” *Tai-Si Kim v. Kearney*, 838 F. Supp. 2d 1077, 1092 (D. Nev. 2012) (quoting *GES,*
27 *Inc. v. Corbitt*, 117 Nev. 265, 270-71, 21 P.3d 11, 14-15 (2001)).

1 33. The conduct alleged in this case is not inherently dangerous. Further, because the
2 other tort claims fail, so does this one.

3 **Civil Conspiracy**

4 34. The elements of a cause of action for civil conspiracy are: (1) defendants, "by some
5 concerted action, intend to accomplish an unlawful objective for the purpose of harming another;
6 and (2) damage resulting from the act(s). *Consol. Generator-Nevada, Inc. v. Cummins Engine Co.*,
7 114 Nev. 1304, 1311, 971 P.2d 1251, 1255 (1999) (quoting *Hilton Hotels v. Butch Lewis*
8 *Productions*, 109 Nev. 1043, 1048, 862 P.2d 1207, 1210 (1993)).

9 35. Because the other tort claims fail, so does this one.

10 **III.**

11 **ORDER**

12 36. Accordingly, for the reasons stated above, the Schneider Defendants' Special
13 Motion to Dismiss is GRANTED.

14 37. If a Court grants a special anti-SLAPP motion to dismiss, the defendants are entitled
15 to an award of reasonable costs and attorneys' fees. NRS 41.670(1)(a). A Court may also award
16 up to \$10,000.00. NRS 41.670(1)(b).

17 38. Additionally, upon the granting of a special anti-SLAPP motion to dismiss, the
18 defendants can bring a separate cause of action against the plaintiffs for compensatory damages,
19 punitive damages, and attorney's fees and costs of bringing the separate action. NRS 41.670(c).

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Intentional Misconduct

COURT MINUTES

March 03, 2017

A-17-749318-C Jennifer Abrams, Plaintiff(s)
vs.
Louis Schneider, Defendant(s)

March 03, 2017 10:00 AM Minute Order

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

COURT CLERK: Jill Chambers

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

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

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Intentional Misconduct

COURT MINUTES

June 05, 2017

A-17-749318-C Jennifer Abrams, Plaintiff(s)
vs.
Louis Schneider, Defendant(s)

June 05, 2017 8:30 AM All Pending Motions

HEARD BY: Leavitt, Michelle

COURTROOM: RJC Courtroom 14D

COURT CLERK: Susan Botzenhart

RECORDER: Kristine Santi

REPORTER:

PARTIES

PRESENT:	Abrams, Jennifer V.	Attorney
	Abrams, Jennifer V	Plaintiff
	Gilmore, Joshua P., ESQ	Attorney
	McLetchie, Margaret A.	Attorney
	Potter, Cal Johnson	Attorney
	Sanson, Steve W	Defendant
	Schneider, Louis C	Defendant
	Willick, Marshal Shawn	Attorney

JOURNAL ENTRIES

- DEFENDANTS' SPECIAL MOTION TO DISMISS UNDER NEVADA'S ANTI-SLAPP STATUTE, NRS 41.660...MOTION TO FILE UNDER SEAL...DEFENDANT LOUIS SCHNEIDER'S AND LAW OFFICE OF LOUIS SCHNEIDER'S MOTION TO DISMISS COMPLAINT PURSUANT TO NRCP 12 (B) (5)...OPPOSITION TO "DEFENDANT LOUIS SCHNEIDER'S AND LAW OFFICES OF LOUIS SCHNEIDER'S MOTION TO DISMISS COMPLAINT PURSUANT TO NRCP 12 (B) (5)" AND COUNTERMOTION FOR ATTORNEY'S FEES...NOTICE OF MOTION TO DISMISS; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF...DEFENDANTS' MOTION TO STRIKE...OPPOSITION TO "DEFENDANTS STEVE W. SANSON AND VETERANS IN POLITICS INTERNATIONAL, INC'S MOTION TO DISMISS" AND COUNTERMOTION FOR ATTORNEY'S FEES...OPPOSITION TO "MOTION TO STRIKE" AND COUNTERMOTION FOR ATTORNEY'S FEES...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...DEFENDANTS' SPECIAL MOTION TO DISMISS PURSUANT TO NEV. REV. STAT. 41.660 (ANTI-SLAPP)...NOTICE OF HEARING ON PLAINTIFFS' MOTION FOR LEAVE TO EXCEED PAGE LIMIT FOR THEIR OMNIBUS OPPOSITION TO 1) SCHNEIDER DEFENDANTS' SPECIAL MOTION TO DISMISS PLAINTIFFS' SLAPP SUIT PER NRS 41.660; 2) SPECIAL MOTION TO DISMISS PER NRS 41.660 (ANTI-SLAPP); AND 3) DEFENDANTS' SPECIAL MOTION TO DISMISS UNDER NEVADA'S ANTI-SLAPP STATUTE PER NRS 41.660

Court disclosed to parties one of the named attorneys with Ms. Abrams' firm, being Brandon Leavitt, Esq., is not related to this Court, at least within in the third degree of consanguinity, Court did an inquiry, and Court is not familiar with him, nor has this Court ever met him. Parties made no inquiry.

Mr. Gilmore advised parties resolved the claims against Mr. Ghibaud's clients Friday afternoon (being Heidi Hanusa, Christina Ortiz, Johnny Spicer, Don Woolbright, Sanson Corporation, and Karen Steelmon), and he is sorry a written stipulation could not be submitted in front of the Court on time, prior to today's hearing. Court confirmed the matter was settled with the named directors. Mr. Gilmore agreed; and added the claims remain with Mr. Sanson, Veterans in Politics International, Inc. (VIPI), and Mr. Schneider and his firm. SO NOTED.

Ms. McLetchie argued in support of the special motion to dismiss under Nevada's Anti-Slapp statute; and further argued as to NRS 41.660, statements at issue by Defendant Steve Sanson having being matters of opinion, abuse litigation, privacy interest on courtroom behavior, Plaintiff having asserted claims without factual support, VIPI having met the burden on the Anti-Slapp analysis, Pegasus case law, protection of First Amendment, Exhibit 1 of Motion, Mr. Sanson being permitted to express opinion on Plaintiff's courtroom behavior, Exhibit 2 of Motion, removal of JAVS recording issue, statements about Plaintiff being a bully and Plaintiff's conduct in court, the article, Exhibit 3, there having been no defamation against Plaintiff, the arguments for Rule 12 (b) (5) having been incorporated in omnibus motion, prima facie evidence needing to be supported, reporters being paid to write stories, Hilton vs. Hallmark case law, NRS 41.665 requirements, and Plaintiff having failed to present evidence. Court stated there were inferences made, and Court does not believe anybody had said Ms. Abrams was an unethical attorney. Ms. McLetchie further argued as to Mr. Sanson having expressed concerns about the courtroom proceedings. Court stated it appeared Mr. Sanson was criticizing actions by the Court more than counsel. Further arguments by Ms. McLetchie as to claims outlined in Amended Complaint, this not being Rule 12 (B) (5) relief but Anti-Slapp relief, no evidence having been presented by Plaintiff regarding emotional distress, the other claims being inappropriate, courtroom video recording, straight defamation analysis, no evidence having been presented by Plaintiff, no evidence of special damages to Plaintiff's business, no harassment claim, no tort, and civil conspiracy requirements. Court determined no statements were attributed from Mr. Schneider, and the video of the courtroom proceeding was given to Mr. Sanson to upload on the Internet. Further arguments by Ms. McLetchie regarding no illegal behavior having occurred by her client, causes of action, and no specificity having been provided by Plaintiff. Court stated the specific claim has to be pled with specificity with a criminal complaint or Information. Mr. McLetchie argued

regarding copyright claims being vexatious, Plaintiff seeking to bury Mr. Sanson when it comes to speech, and injunction being sought.

Mr. Potter addressed the civil conspiracy theory; and argued this is all from a dispute between Mr. Leavitt and Mr. Schneider in the Family Court case, including the bar complaint filed against Mr. Schneider, further noting Mr. Leavitt was removed from the case. Counsel made arguments as to unethical conduct by Mr. Leavitt, issue in Family Court, and the proceedings having been sealed. Court stated sealing a hearing does not mean it is not a public record, further noting a court may close a hearing to discuss specific things, however, the District Court does not seal proceedings from the record. Upon Court's inquiry, Mr. Potter confirmed there are no predicate crimes here; and he will request an appropriate dismissal and also request sanctions, as he has a Rule 12 (B) (5) motion filed before the Court.

Upon Court's inquiry, Mr. Gilmore clarified Mr. Schneider was brought in the case on a conspiracy claim. Thereafter, counsel argued in support of the claim. Further arguments and discussions were made as to public interest, Shapiro factor, conspiracy theory, private controversy surrounding a private dispute between Ms. Abrams and Mr. Sanson, and Defendants' claim about Ms. Abrams being able to scare Judge Elliot not being the case. Court noted Judge Elliot signed the order to have the courtroom recording taken down. Mr. Gilmore addressed the gag factor. Discussions as to the courtroom recording having shown up on a Russian website. Mr. Gilmore argued Judge Elliot did not want the video posted. Court noted Family Court matters are public, and the courtroom is a public forum. Further discussions as to written reply, and Court's concerns regarding statement in e-mail. Mr. Gilmore advised limited discovery can be done about the internet issue, if Court is inclined to allow this. Further arguments as to Defendant having failed to meet the second and third factors. Further discussions as to the Court not being able to deny anybody else to be present in a courtroom, unless there was a good reason. Mr. Gilmore argued Defendants do not get the benefit with Anti-Slapp, and this has not arrived to Rule 12 (B) (5). Further arguments as to public forum issue. Court noted everything stems from the video recording in the courtroom, nobody can deny what happened in the video, and what happened was not nice, but it happened, and it was truthful. Further arguments as to Defendants not having proven the truth, words having been placed in the article, Exhibit 2, message being conveyed by Defendant, and ethical problem. Court stated the criticism was on the Court and not the lawyer, and only the Court can order cases to be sealed, not a lawyer. Further arguments as to page 4 of article, some element of truth needing to be here, gag order from Judge Elliot, and nobody being able to state it is a matter of opinion as a matter of law, as this is false. Further arguments as to predicate claims, copyright claims not being under NRS 41.660, harassment claims being under Rule 12 (B) (5), and intentional infliction of emotional distress claim. Mr. Gilmore addressed the e-mail between Mr. Leavitt and Mr. Schneider; and argued a bad purpose is not needed. Court noted the only evidence is Mr. Schneider had the video. Mr. Gilmore argued as to agreement having been made to target Ms. Abrams, and reasonable inference. Discussions as to Ms. Abrams not being a public figure. Further arguments as to fair reporting privilege, Defendants failing to meet the prong, and claims having minimal merit. Mr. Gilmore noted Plaintiffs will request limited discovery to flush out the other issues. Court stated it believes it has to resolve the special motion, before the Rule 12 (B) (5) motion.

Ms. Abrams requested to correct a few things; and argued Mr. Sanson did not follow the Court's order. Ms. McLetchie objected. Court advised Ms. Abrams to speak with her attorney, and the Court will allow her attorney to tell the Court the concerns. Mr. Willick apologized to the Court; and stated he lost his voice, and his client may have been speaking on his behalf. Court stated it will allow Ms. Abrams to speak to her attorneys. Mr. Gilmore argued as to Mr. Sanson having re-published the video. Court noted it appears Mr. Sanson complied with the order.

Ms. McLetchie argued regarding statements about sealing proceedings in Family Court case, further discovery not being helpful on any issue, and case being about statements. Further arguments as to fair report privilege, Plaintiffs having burden to prove the statements were unprivileged, Plaintiffs' claims having no validity, injunctive relief, and dismissal of case.

COURT ORDERED, a decision will issue by minute order. Court noted it will have to rule on the Anti-Slapp motion first, before the Rule 12 (B) (5) Motion. Mr. Potter noted the e-mail that is in question is before the hearing, before any of the publications, because the Motion is part of that hearing, which was set prior to all of this.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Intentional Misconduct

COURT MINUTES

June 22, 2017

A-17-749318-C Jennifer Abrams, Plaintiff(s)
vs.
Louis Schneider, Defendant(s)

June 22, 2017 3:00 AM Minute Order

HEARD BY: Leavitt, Michelle

COURTROOM: RJC Courtroom 14D

COURT CLERK: Susan Botzenhart

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- MINUTE ORDER RE: SPECIAL MOTION TO DISMISS PURSUANT TO NRS 41.660 (ANTI-SLAPP)...SCHNEIDER DEFENDANTS SPECIAL MOTION TO DISMISS PLAINTIFFS SLAPP SUIT PURSUANT TO NRS 41.660 AND REQUEST FOR ATTORNEYS FEES, COSTS, AND DAMAGES PURSUANT TO NRS 41.670

The Court having reviewed the pleadings in this matter and after hearing extensive oral argument hereby GRANTS defendants' Special Motion To Dismiss pursuant to NRS 41.660 (Anti-Slapp).

Under Nevada s Anti-Slapp statutes, a defendant may file a special motion to dismiss. The Defendant must show "by a preponderance of the evidence, that the claim is based upon a good faith communication in furtherance of the right to petition or the right to free speech in direct connection with an issue of public concern." NRS 41.660(3) (a). If the defendant makes the initial showing, the burden shifts to the Plaintiff to show "with prima facie evidence a probability of prevailing on the claim." NRS 41.660 (3)(b).

NRS 41.637 (4) defines a "good faith communication in furtherance of the right to petition or the right to free speech in direct connection with an issue of public concern" as follows:

Communication made in direct connection with an issue of public interest in a place open to the public or in a public forum, which is truthful or is made without knowledge of its falsehood.

In *Shapiro v. Welt*, 389 P.3d 262 (2017), the court outlined guiding principles in determining what constitutes "public interest":

1. "public interest" does not equate with mere curiosity;
2. A matter of public interest should be something of concern to a substantial number of people; a matter of concern to a speaker and a relatively small specific audience is not a matter of public interest;
3. There should be some degree of closeness between the challenged statements and the asserted public interest the assertion of a broad and amorphous public interest is not sufficient;
4. The focus of the speaker's conduct should be the public interest rather than a mere effort to gather ammunition for another round of private controversy; and
5. A person cannot turn otherwise private information into a matter of public interest simply by communicating it to a large number of people. *Id.* at 268.

The Defendants met their burden of showing that the instant matter arises from Defendants' good faith communications in furtherance of the right to free speech in direct connection with an issue of public concern. The majority of the communication took place on the public forum of the internet and the communications were made without knowledge of falsehood, or were opinions incapable of being true or false.

Therefore, the burden shifts to the Plaintiff to show "with prima facie evidence a probability of prevailing on the claim." NRS 41.660 (3) (b). Plaintiffs failed to meet their burden as they cannot show a probability of success on their claims. Accordingly, the Special Motion To Dismiss is GRANTED.

Pursuant to NRS 41.670 (a), the court shall award reasonable costs and attorney's fees to the person against whom the action was brought. Further, the court has discretion to award, in addition to reasonable costs and attorney's fees awarded pursuant to (a), an amount up to \$10,000 to the person against whom the action was brought.

The Defendants in this matter may file any additional motions pursuant to NRS 41.670, on or before July 24, 2017.

Ms. McLetchie, Esq. to prepare the order for the Court as to the Sanson defendants. Mr. Cal J. Potter, Esq. to prepare the order for the Schneider defendants.

CLERK'S NOTE: A copy of the above minute order has been forwarded to: Attorney Joshua Gilmore, Esq., Attorney Marshal Willick, Esq., Attorney Margaret McLetchie, Esq., and Attorney Cal Potter, Esq. /// sj

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Intentional Misconduct

COURT MINUTES

February 07, 2018

A-17-749318-C Jennifer Abrams, Plaintiff(s)
vs.
Louis Schneider, Defendant(s)

February 07, 2018

8:00 AM

Minute Order

**Minute Order
regarding scheduled
hearing for February
12, 2018 at 9:30 a.m.**

HEARD BY: Leavitt, Michelle

COURTROOM: Chambers

COURT CLERK: Susan Botzenhart

RECORDER:

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- COURT ORDERED, the matters currently scheduled for February 12, 2018 are VACATED at this time, pending written decision from Chief Judge Gonzalez on the Plaintiffs' Motion to disqualify.

CLERK'S NOTE: A copy of the above minute order has been forwarded to Attorneys Marshal S. Willick, Esq., Dennis Kennedy, Esq., Margaret A. McLetchie, Esq., and Joseph W. Houston, II, Esq.
/// sb

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Intentional Misconduct

COURT MINUTES

March 02, 2018

A-17-749318-C Jennifer Abrams, Plaintiff(s)
vs.
Louis Schneider, Defendant(s)

March 02, 2018

2:58 PM

All Pending Motions

HEARD BY: Gonzalez, Elizabeth

COURTROOM: Chambers

COURT CLERK: Dulce Romea

RECORDER:

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- PLAINTIFFS' 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...MINUTE ORDER RE: CASE REASSIGNMENT

COURT ORDERED, given the high number of recusals by sitting district judges, this matter is referred to the senior judge department for assignment of a senior judge to this case.

COURT FURTHER ORDERED, motion to disqualify OFF CALENDAR.

CLERK'S NOTE: Parties notified by distributing a copy of this minute order via the E-Service list. / 3-5-18

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Intentional Misconduct

COURT MINUTES

April 17, 2018

A-17-749318-C Jennifer Abrams, Plaintiff(s)
vs.
Louis Schneider, Defendant(s)

April 17, 2018

9:00 AM

All Pending Motions

HEARD BY: Hardcastle, Kathy

COURTROOM: Phoenix Building Courtroom -
11th Floor

COURT CLERK: Haly Pannullo

RECORDER: Patti Slattery

REPORTER:

PARTIES

PRESENT: Gilmore, Joshua P., ESQ Attorney
 Shell, Alina Attorney
 Willick, Marshal Shawn Attorney

JOURNAL ENTRIES

- Leo Wolpert, Esq., present on behalf of Sanson and Veteran's and Politics.

MOTION TO RECONSIDER ... JOINDER
COURT ORDERED, Motion to Reconsider DENIED

OPPOSITION AND COUNTERMOTION

Court noted this case is on appeal and the Motion for fees and allowances can be considered when the case is remitted to District Court. Ms. Shell inquired if the Court is Ordering suspension of the briefing on attorney's fees pending resolution of the Supreme Court, COURT SO ORDERED.

Mr. Willick stated he will prepare the Order and submit to counsel for review.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Intentional Misconduct**COURT MINUTES****April 20, 2018**

A-17-749318-C Jennifer Abrams, Plaintiff(s)
vs.
Louis Schneider, Defendant(s)

April 20, 2018 9:00 AM Motion for Clarification

HEARD BY: Hardcastle, Kathy **COURTROOM:** Phoenix Building 11th Floor
110

COURT CLERK: April Watkins

RECORDER: Patti Slattery

REPORTER:

PARTIES

PRESENT:	Abrams, Jennifer V	Plaintiff
	Gilmore, Joshua P., ESQ	Attorney
	Houston, Joseph W., II	Attorney
	McLetchie, Margaret A.	Attorney
	Willick, Marshal Shawn	Attorney

JOURNAL ENTRIES

- Court noted there has been no ruling on motion to disqualify. Matter was transferred from Chief Judge due to number of recusals. After hearing from Monday of this week, the Court was given a letter from Joseph Houston indicating he and this Court's ex-husband, Gerald Hardcastle, shared office space in the past and also, this Court shared office space in the past with Mr. Houston as well. Further, Mr. Houston previously represented this Court's daughter in uncontested matters, not currently representing daughter and Mr. Houston's wife was Gerald Hardcastle's Judicial Executive Assistant (JEA) while he was on the District Court bench. Additionally, this Court's daughter and Mr. Houston's daughter spent time together in gymnastics. Mr. Houston advised that he is not on Willick case (A750171). Ms. McLetchie stated he client is not present and would like to confer regarding this development. COURT ORDERED, parties to advise the Court's JEA, Ms. Spoor, as to what the parties agree to and a minute order will issue. Further, the Court stated if requested to step down, Chief Judge will be contacted regarding reassignment. Upon Court's inquiry, Ms. McLetchie advised parties attended a settlement conference in Abrams v. Willick which was very unsuccessful

and unlikely not to settle. Further, Ms. McLetchie advised she is always open to settlement and is not sure what parameters, if any, would help. Mr. Gilmore stated settlement conference pushed parties further apart and believes direction from the Supreme Court would be helpful. Further, in Willick case, brief is completed. Mr. Houston advised the Sater matter is intertwined and on appeal. Further, there was an order to show cause in the Supreme Court, order show cause was responded to, under submission and waiting for decision. Additionally, Mr. Houston advised he is appellant counsel in Sater matter and proceeding with settlement in that case. Ms. Levy inquired even though Mr. Houston not in case, will the Court look for waiver. Court stated there is no conflict on the other two cases, only Willick v. Abrams case. Mr. Willick advised in the Sater case, Mr. Schneider counsel on other case and is associated with Mr. Houston. Ms. McLetchie noted there was an outstanding issue in Abrams case as to a motion for attorney fees. Court stated that will be addressed after appeal. If dismissal was upheld, the Court will need to look at fees. If matter is overturned, will be moot and if this Court remains on case, will decide and noted there are competing orders. If not on case, other Judge will have to handle. Ms. McLetchie argued under the anti-slap motion, District Court is required to award fees and costs. Court stated other issue has to be decided first. Mr. Houston inquired if the Court is setting a deadline to notify the Court. Ms. McLetchie stated she will contact her client and requested to notify the Court by Monday, 1:00 p.m. COURT SO ORDERED. Mr. Houston stated there is an order from the Schneider case that has not been signed from original hearing, have reviewed order and request the Court sign. Court stated order will be given to the Chief Judge for signature. Mr. Gilmore stated he has no objection as to this Court remaining on case.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Intentional Misconduct**COURT MINUTES****April 23, 2018**

A-17-749318-C Jennifer Abrams, Plaintiff(s)
 vs.
 Louis Schneider, Defendant(s)

April 23, 2018**8:13 AM****Minute Order****Minute Order Re:
Case Reassignment****HEARD BY:** Hardcastle, Kathy**COURTROOM:** Chambers**COURT CLERK:** April Watkins**RECORDER:****REPORTER:****PARTIES****PRESENT:**

JOURNAL ENTRIES

- By order of the Chief Judge Elizabeth Gonzalez three cases including Abrams v Schneider, Willick v Sanson and Diciero v Sanson were assigned to Senior Judge Kathy Hardcastle. A hearing was set on pending motions in Diciero v Sanson. Subsequently the Court was notified that the motions had been resolved and a stipulation and order would follow. No stipulation and order was filed so the hearing date in that case was not vacated. Judge Kathy Hardcastle was notified on Tuesday, April 16, 2018, that additional motions in Abrams v Schneider had been filed and set for hearing on the same date and time as the Diciero matter. When the matter was called, neither Mr. Schneider nor his counsel were present and remaining parties indicated they were ready to proceed. The hearing went forward. After the hearing, Judge Hardcastle was notified that Joe Houston was counsel for Schneider and was provided a copy of Mr. Houston's letter bringing his representation to the Court's attention.

The Court set the matter back on calendar on April 20, 2018, to make a court record on disclosure of the Judge's prior relationship with Joe Houston and his family and his previous representation of the Judge's daughter. The Judge gave counsel until Monday at 1 pm to notify the senior judge department if her continued handling of the case would make anyone uncomfortable, in which case she would then recuse on this case and refer the matter back to the Chief Judge for reassignment.

Subsequently a motion to reassign was filed by a party. So Judge Hardcastle has now RECUSED in Abrams v Schneider and REFERRED to matter back to the Chief Judge.

CLERK S NOTE: This Minute Order was electronically served by Courtroom Clerk, April Watkins, to all registered parties for Odyssey File & serve. aw



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

MARSHAL S. WILLICK, ESQ.
3591 E. BONANZA RD., STE 200
LAS VEGAS, NV 89110

DATE: May 9, 2018
CASE: A-17-749318-C

RE CASE: JENNIFER V. ABRAMS; THE ABRAMS AND MAYO LAW FIRM vs. LOUIS SCHNEIDER; LAW OFFICES OF LOUIS C. SCHNEIDER, LLC; STEVE W. SANSON; VETERANS IN POLITICS INTERNATIONAL, INC.

NOTICE OF APPEAL FILED: May 7, 2018

YOUR APPEAL HAS BEEN SENT TO THE SUPREME COURT.

PLEASE NOTE: DOCUMENTS **NOT** TRANSMITTED HAVE BEEN MARKED:

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

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

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

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

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

Certification of Copy

State of Nevada }
County of Clark } SS:

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

NOTICE OF APPEAL; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET; 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 41.6701; NOTICE OF ENTRY OF ORDER GRANTING SCHNEIDER DEFENDANTS' SPECIAL MOTION TO DISMISS PLAINTIFF'S SLAPP SUIT PURSUANT TO NRS 41.660 AND REQUEST FOR ATTORNEY'S FEES, COSTS, AND DAMAGES PURSUANT TO NRS 41.670; DISTRICT COURT MINUTES; NOTICE OF DEFICIENCY

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

Plaintiff(s),

vs.

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

Defendant(s),

Case No: A-17-749318-C

Dept No: Unassigned

now on file and of record in this office.

IN WITNESS THEREOF, I have hereunto
Set my hand and Affixed the seal of the
Court at my office, Las Vegas, Nevada
This 9 day of May 2018.

Steven D. Grierson, Clerk of the Court



Amanda Hampton, Deputy Clerk