

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * * * *

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

Appellant,

vs.

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

Respondent.

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

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

**VOLUME VII
Part 2**

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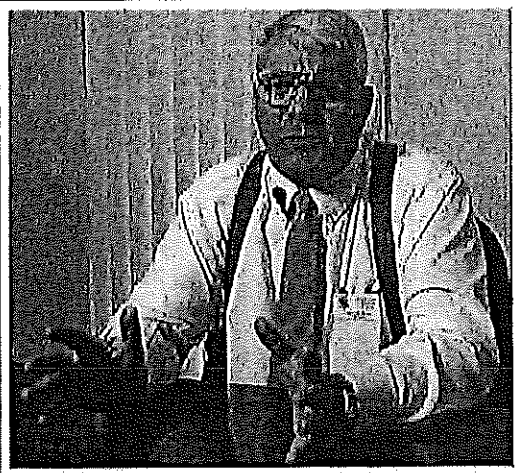
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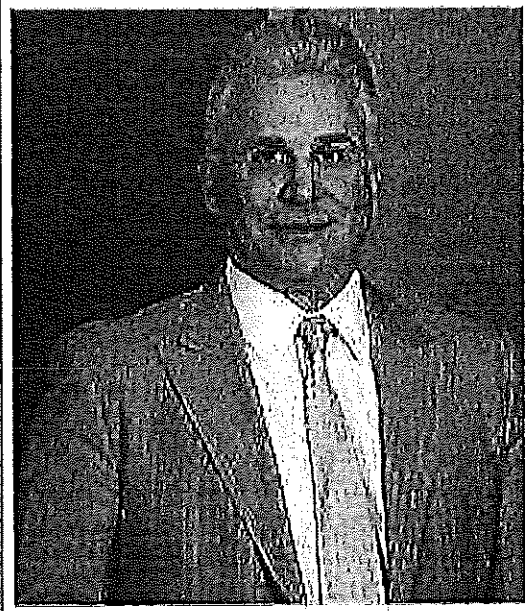
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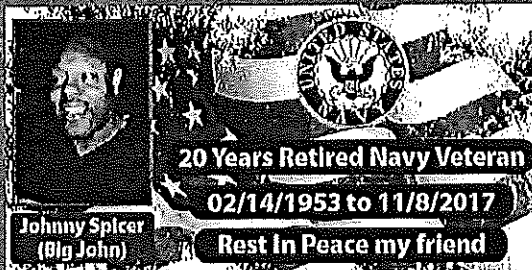
Jordan Ross Constable
Laughlin Township



Mark Bailus Clark
County District Court
Judge Department 18



Lindsey Licari a discussion on
starting a foundation for cancer
survivors: Aydens Army of
Angels



Join us in the
Celebration of Life
Johnny Spicer The
Ceremony will be held
on Wednesday
November 22nd from
5PM to 8PM at the
Marine Corps League of
Greater Nevada 4360
West Spring Mountain
Road Las Vegas NV

89102 on the North East
corner of Spring
Mountain and Arville
across from China
Town. Johnny was an
officer in Veterans In
Politics for the past 12
years. For Directions
please call 702 368-
1775

Veterans In Politics proudly announces **Jordan Ross** Constable, Laughlin Township and **Mark Bailus** Clark County District Court Judge Department 18 and **Lindsey Licari** a discussion on starting a foundation for cancer survivors: **Aydens Army of Angels**, all will appear as a special guests on the Veterans In Politics internet video talk-show **Saturday November 25, 2017.**

FIND OUT MORE

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



The **VIP Talk-Show** is a trusted source of information. For more than a decade, **Steve Sanson**, **Jim Jonas** and co-hosts

Shyla Rose, Mantis Toboggan and guest co-host Christina Ortiz have informed the listeners about important local and national issues. Not only do they discuss major national issues, but they also bring public's attention to multiple local issues affecting our community that other news sources choose to ignore. Past guests are politicians, candidates running for public office, organization leaders, published authors, business owners and citizens. **VIP**'s involvement in local affairs has led to investigations of multiple government agencies and corrupt individuals. **VIP** received special recognition and multiple awards from government officials and non-profit organizations.

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

Contact Us at 702 283 8088

Show Archive on World Wide
Digital Broadcast

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

Veterans Day Celebration

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NRS 1.235 CERTIFICATE

I, JENNIFER V. ABRAMS, ESQ., attorney for Plaintiffs in the above-entitled actions, hereby certify, pursuant to NRS 1.235, that the affidavit of Plaintiffs, MARSHAL S. WILLICK and JENNIFER V. ABRAMS, are filed in good faith and not interposed for delay.
DATED Wednesday, January 24, 2018.

/s/ Jennifer V. Abrams, Esq.
Jennifer V. Abrams, Esq.
Attorney for Plaintiffs

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that the foregoing *Motion to Disqualify Eighth Judicial*
3 *District Court Elected Judiciary, and for Permanent Assignment to the Senior*
4 *Judge Program or, Alternatively, to a District Court Judge Outside of Clark County*
5 was filed electronically with the Eighth Judicial District Court in the above-entitled
6 matter on Wednesday, January 24, 2018. Electronic service of the foregoing
7 document shall be made in accordance with the Master Service List, pursuant to
8 NEFCR 9, as follows:

9 MARGARET A. McLEITCHIE, ESQ.
10 Attorney for Defendants, STEVE W. SANSON and VETERANS IN
POLITICS INTERNATIONAL, INC., in case number A-17-749318-C

11 ANAT LEVY, ESQ.
12 Attorney for Defendants, STEVE W. SANSON and VETERANS IN
POLITICS INTERNATIONAL, INC., in case number A-17-750171-C

13 JOSEPH W. HOUSTON, II, ESQ.
14 Attorney for Defendants, LOUIS C. SCHNEIDER and LAW
OFFICES OF LOUIS C. SCHNEIDER, LLC, in case number A-17-
15 749318-C

16 /s/ David J. Schoen, IV, ACP
17 An Employee of The Abrams & Mayo Law Firm
18
19
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24

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1



WAR declared on Clark County Nevada Family Court System

August 2 · 🌐

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

Don't waste your time, we are not clearing out bulshit just to fill it with yours!

Steve Sanson

President of Veterans In Politics International

👍 Like

💬 Comment

➦ Share

👍❤️ 26

Chronological ▼

2 Shares

EXHIBIT 2

EXHIBIT 2

EXHIBIT 2



WAR declared on Clark County Nevada Family Court System

August 18 · 🌐

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

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

The time to start name recognition is NOW!



Like



Comment



Share



6

Chronological ▾



Silva Welthy Please expect to be drug tested and psychologically tested. Only honest people who care about children need apply.

Like · Reply · August 24 at 6:17pm



Sandi Johnson Amen.

Like · Reply · August 24 at 7:57pm



Doug Ansell They will have to see one of the three doctors selected by Steve Sanson, then they will have to pay the \$5,000 evaluation fee within 30 days. Lol jk

Like · Reply · 🌐 2 · August 24 at 8:02pm



Write a reply...



Mathew McLay Remove Sandra Pomrenzell

Like · Reply · August 24 at 8:01pm



Silva Welthy well since she ordered me to be homeless and thinks my articulate 13 year old should NOT have a voice, I'd have to agree.

Like · Reply · August 24 at 8:05pm



Mathew McLay Welthy Silva did you have a lawyer?

Like · Reply · August 24 at 8:07pm



Silva Welthy of course not. I am nearly bankrupt from family court and Legal Aide has been useless

Like · Reply · August 24 at 8:08pm



Mathew McLay Welthy Silva OK because I am going in there by myself also.

Like · Reply · August 24 at 8:09pm



Mathew McLay 2 1/2 more years and she is gone. I don't think she's running for reelection. Not that that does either one of us any good but it's a light at the end of the tunnel.

Like · Reply · 🌐 1 · August 24 at 8:11pm

EXHIBIT 3

EXHIBIT 3


EXHIBIT 3



WAR declared on Clark County Nevada Family Court System

June 22 · 🌐

PROTEST: On Friday June 23rd from 8 to 11am in front of Clark County Family Court from 8 to 11am. 601 North Pecos Road. Don't be intimidated by a bad system.



**BE A COURT
OBSERVER!**

**WE KEEP
'EM HONEST**

702-283-8088



WAR declared on Clark County Nevada Family Court System

August 5 · 🌐

Some judges (but not all!) Judges in the Clark County Family Court are lazy!

- 1) Some judges rely on a third party to make decisions for them.
- 2) Some judges take months (and sometimes years) to render a decision, forcing parties to put their lives on hold.
- 3) Some judges have no respect for your time, money, or mental health
- 4) Some judges cancel or reschedule your case without giving litigants proper notice.
- 5) Some judges put in less than 40 hours at the courthouse and make over \$200,000 per year with benefits. All paid for by taxpayers.
- 6) Some judges allow attorneys with whom they are friends, or who have given campaign contributions to run the people's courtrooms.
- 7) Some judges legislate from the bench.
- 8) Some judges violate the US Constitution.
- 9) Some judges bring their personal bias to the bench.
- 10) Some judges will rule on your case with absolutely NO evidence, or don't enforce proper rules of evidence in their Courtrooms.

The days of some judges will come to an end my friends. We will stick together. We have plenty of time to organize and focus on the elections in 2020. If what I am hearing is correct, more than a third will leave the bench between now and 2019, and the rest will not run for re-election or will be destroyed in a primary or general election. We will expose each and every one of them for who they are, and we will make sure that the ones that respect the law stay put!

Steve Sanson

President of Veterans In Politics

👍 Like

💬 Comment

➦ Share

🗨️ 15

Chronological ▼

View 1 more comment

Press Enter to post.



WAR declared on Clark County Nevada Family Court System

August 23 · 🌐

ALERT:

We are looking for litigants both male and female that felt they received a bias ruling by the hands of Family Division Clark County District Court Judge Rena "GOD" Hughes.

Please send an email to vipipresident@cs.com include your name, case number, a video of your case and bullet points of each and every corrupt ruling that was made by this Judge.

We believe that this Judge might have had a terrible mother or have an issue with child birth.

We have reached this conclusion on the disgusting and unlawful ways she engage with female litigants (mothers).

This judge is NOT a mother and is currently going through a divorce.

An investigation is underway into this judge's background.

Steve Sanson

President of Veterans In Politics International Inc.

702 283 8088

www.familycourtwar.com



Family Court System

want to be on his bad side when he goes THIS far?

Why would anyone

JVA001304



WAR declared on Clark County Nevada Family Court System

November 22 at 11:49pm · 🌐

I am tired of people coming up to me and saying; "hey that family court judge you went after is a friend of mine." What is that supposed to mean to me? What you are saying to me is as long as they are a friend of yours, we/me should look the other way and let them be that corrupted elected official. It must be a free pass to be corrupted as long as they are YOUR friend. Let me just say this, my organization has helped placed allot of Family Court Judges on the bench. But the difference between you and us/me is this, we value law, fairness, and the constitution over your corrupted friends that are sitting on the bench. Here is my quote, "if YOU turn a deaf ear or a blind eye to corruption YOU are just as guilty as the perpetrators committing the injustice".

Happy Thanksgiving to those that are willing to stand up even if it means to stand alone.

Sheep will always be prey.

Semper Fidelis

Steve Sanson

President of Veterans In Politics International

👍 Like 💬 Comment ➦ Share

👍❤️ 31

Chronological ▼

1 Share



Sabrina Autry 🌐🌐

Like · Reply · November 23 at 12:44am



Write a comment...



Press Enter to post.



WAR declared on Clark County Nevada Family Court System

November 25 at 10:35pm · 🌐

(VIPI) Veterans In Politics International, Inc. has filed a judicial complaint with the Nevada Commission on Judicial Discipline on the case of McDonald vs. McDonald against family Court Judge Linda Marquis, this will be the 6th Family Court Judge that a complaint has been filed by VIPI.



Like



Comment



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9

Chronological ▾



Tom Carr Can we see the complaint?

Like · Reply · November 27 at 11:53am



Write a comment...



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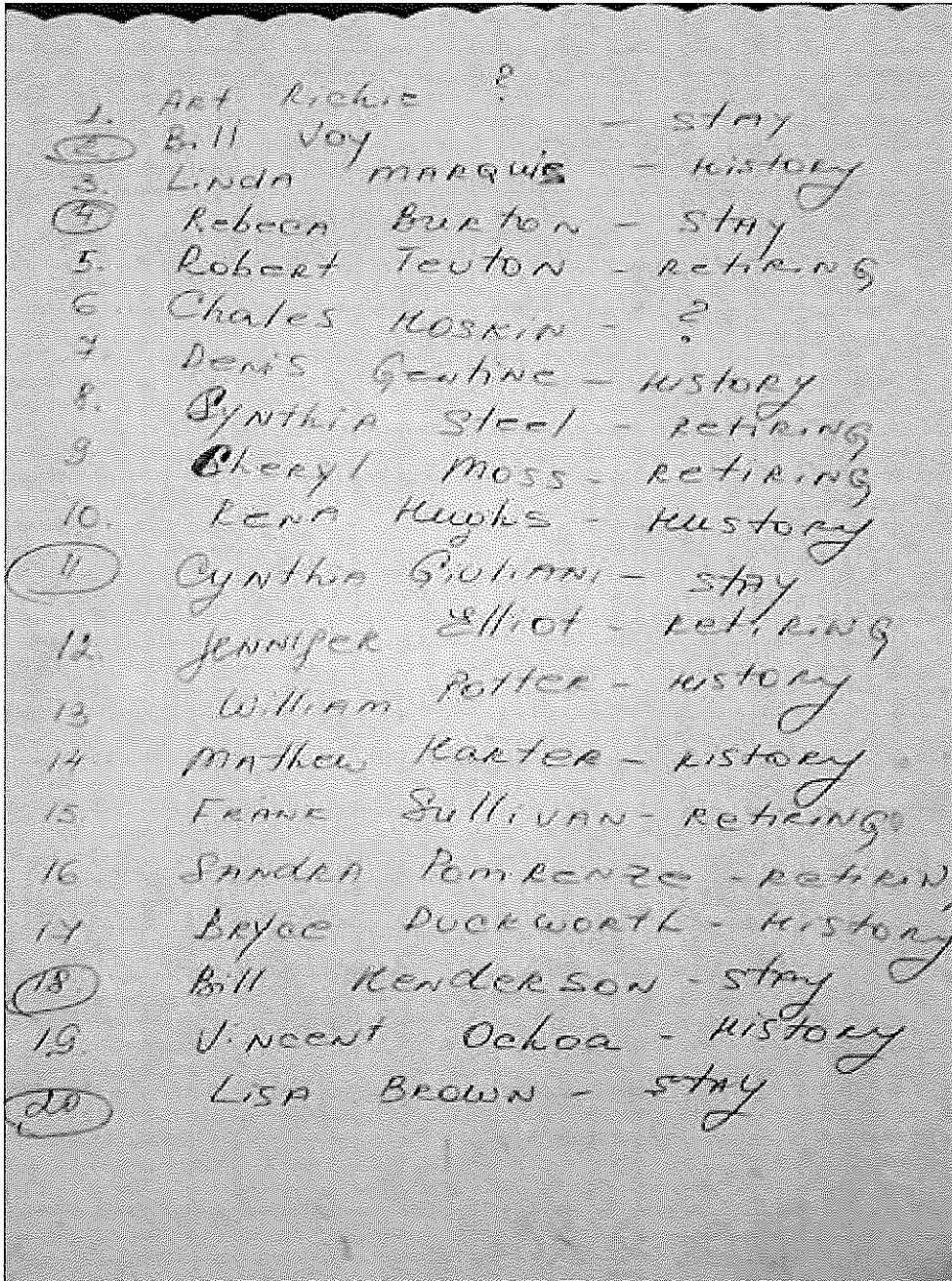
...



WAR declared on Clark County Nevada Family Court System
is with Steve Sanson and Steve Sanson.

November 28 at 12:55pm · 🌐

Clark County Family Court Judge retention prediction from now until November 2020.



Like

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👤 28

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JVA001307

From: Veterans In Politics International Inc. <devildog1285@cs.com>
Sent: Tuesday, August 29, 2017 12:53 AM
To: BKL Group
Subject: Mom Loses Legal Custody and Primary Physical Custody of Daughter -- Over a Bad Attitude!

Having trouble viewing this email? [Click here www.veteransinpolitics.org](http://www.veteransinpolitics.org)

Hi, just a reminder that you're receiving this email because you have expressed an interest in Veterans In Politics International Inc.. Don't forget to add devildog1285@cs.com to your address book so we'll be sure to land in your inbox!

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



Mom Loses Legal Custody and Primary Physical Custody of Daughter -- Over a Bad Attitude!

Just the latest of Judge Rena Hughes'
"Courtroom Greatest Hits."



Clark County Nevada
August 29, 2017

Sarah Gazala, a Special Education Life Functional Skills teacher for the Clark County School District, who teaches mentally and physically challenged students, recently lost legal custody of her six year old daughter, and was basically relegated to visitations every other weekend.

Why? Family Court Judge Rena Hughes found that Sarah had a bad attitude -- towards her ex-husband! No wonder newly divorced moms seem to be losing their kids in droves in Judge Hughes' courtroom! There was no finding of substance abuse, domestic violence, neglect, parental alienation, or any inability to parent whatsoever.

The parties were divorced in 2013 and per their divorce decree, each had joint physical and legal custody of their young daughter. Dad recently went back to court to get full legal custody and primary physical custody complaining that Mom didn't apprise him fast enough of certain doctor's visits, her parents' address, and the fact that she got remarried.

The Parent-Coordinator that Hughes appointed wrote a report to the Judge in September 2016 seeking to withdraw from the case because Mom, who earns about half of what Dad earns, could no longer afford to pay her retainer. In the report, she gave her opinion that mom was "arrogant," "overbearing," "difficult," "oppositional" and made a host of other similar subjective derogatory comments about Mom. Ironically, the report indicated that both Mom and Dad have strong personalities, and that "Mom is legitimate in her concern [about Dad], but her delivery of her concern is often accusatory and aggressive and prevents the possibility of negotiation." The Parent-Coordinator also testified at trial that "both as a single parent of an adult child and based on Mom's culture and beliefs and having already raised an adult child, it would be more difficult for Mom to change her parenting ways."

So what "culture" must one have in order to keep custody of a child? And what "parenting" ways is she referring to?

And just like that, Mom lost the right to have a say in major life decisions affecting her daughter including the right to have a say in major health issues and religious upbringing. Mom also lost the right to equal physical custody.

Moreover, the Clark County School District, Mom's own employer, recently banned Mom from volunteering in her daughter's class - apparently, volunteering during school hours is not part of Mom's

visitation rights!

To add insult to injury, Mom was ordered to pay Dad's attorneys' fees and costs for the privilege of losing her child, even though Dad earns about twice what Mom earns.

Where is the justice in all of this, and how is this in the best interests of the child? How is it in keeping with Mom's constitutional rights to have a say in the upbringing of her child?

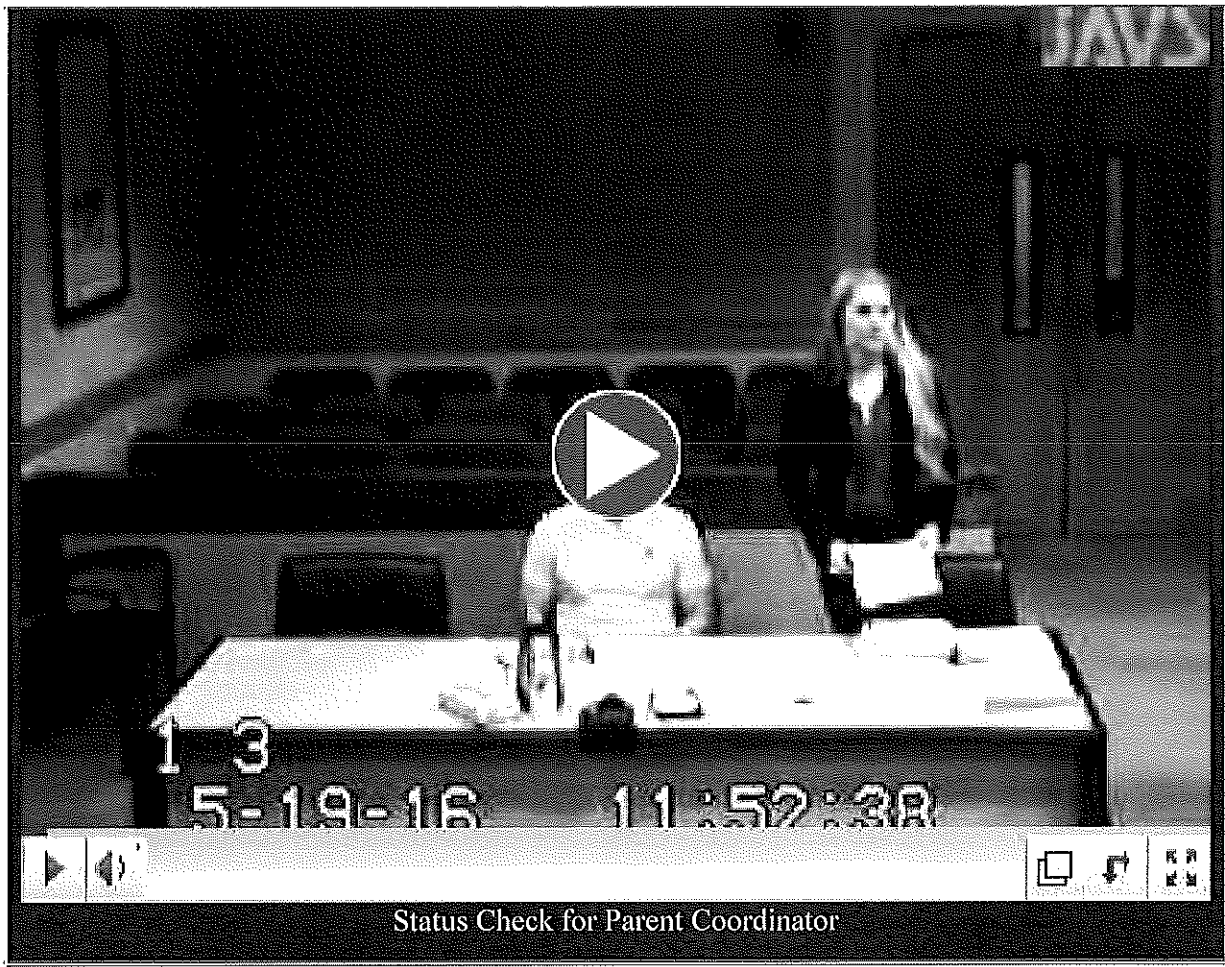
How does this compare to cases in which a parent is guilty of abusing and neglecting a child and the parents still keep legal custody or are reunited after parenting classes?

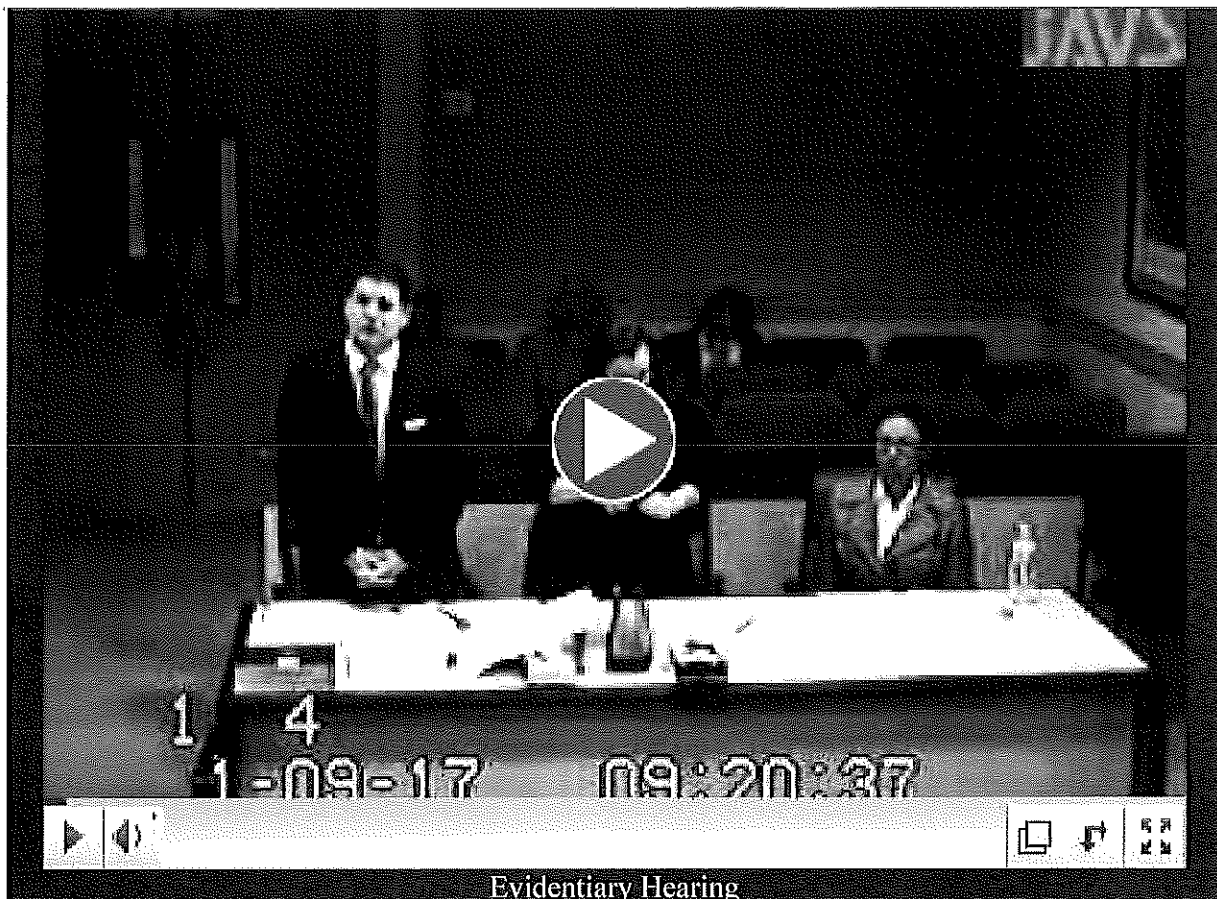
It seems it takes more to lose a house or a car than it takes to lose a child in Judge Hughes' courtroom.

Remember this when you vote for judges in 2020 - we need judges who understand the importance of a child being raised by both parents, and not one who makes a major life decision for a child based on a subjective opinion of someone's attitude.

CLICK HERE TO VIEW: FINDINGS OF FACT, CONCLUSIONS OF LAW, DECISION AND ORDER

(Click onto each video)





Rule 2.6. Ensuring the Right to Be Heard.

(A) A judge shall accord to every person who has a legal interest in a proceeding, or that person's lawyer, the right to be heard according to law.

Of the three days of trial, the opposing party, Odin Johnson (dad) and their witness, Mrs. Steinkamp testimonies were a third longer if not two thirds longer than Ms. Gazala testimony, which was rushed.

The last 3 hours of trial and witness how Judge Hughes is pushing for Ms. Gazala testimony to be rushed when her attorney disclosed an allotted amount of time and did not exceed it yet the opposing parties allotted amount of time far exceeded what they disclosed.

(B) A judge may encourage parties to a proceeding and their lawyers to settle matters in dispute but shall not act in a manner that coerces any party into settlement.

On July 21st 2016, Ms. Gazala requested the opposing party seek mediation. Ms. Gazala filed a form for Family Mediation Center and submitted it. Judge Hughes denied her request for mediation. Many attempts made by Ms. Gazala attorney for negotiations. Ms. Gazala efforts for resolution were denied multiple times. Judge Hughes then states in her final decision that Ms. Gazala is difficult to negotiate with.

which is contradicts what she was trying to achieve on many occasions. Judge Hughes did not objectively review all facts.

[1] The right to be heard is an essential component of a fair and impartial system of justice. Substantive rights of litigants can be protected only if procedures protecting the right to be heard are observed.

[2] The judge plays an important role in overseeing the settlement of disputes, but should be careful that efforts to further settlement do not undermine any party's right to be heard according to law. The judge should keep in mind the effect that the judge's participation in settlement discussions may have, not only on the judge's own views of the case, but also on the perceptions of the lawyers and the parties if the case remains with the judge after settlement efforts are unsuccessful. Among the factors that a judge should consider when deciding upon an appropriate settlement practice for a case are whether: (1) the parties have requested or voluntarily consented to a certain level of participation by the judge in settlement discussions, (2) the parties and their counsel are relatively sophisticated in legal matters, (3) the case will be tried by the judge or a jury, (4) the parties participate with their counsel in settlement discussions, (5) any parties are unrepresented by counsel, and (6) the matter is civil or criminal.

[3] Judges must be mindful of the effect settlement discussions can have, not only on their objectivity and impartiality, but also on the appearance of their objectivity and impartiality. Despite a judge's best efforts, there may be instances when information obtained during settlement discussions could influence a judge's decision making during trial, and, in such instances, the judge should consider whether disqualification may be appropriate. See Rule 2.11(A) (1).



Rule 2.2. Impartiality and Fairness.

A judge shall uphold and apply the law, and shall perform all duties of judicial office fairly and impartially.

[1] To ensure impartiality and fairness to all parties, a judge must be objective and open-minded.

One hour and thirty minutes into the first day of trial, Judge Hughes and Katy Steinkamp, Parenting Coordinator also a Marriage and Family Therapist, labeled Ms. Gazala as narcissist. These are biased opinions and not based on any facts. Judge Hughes was not objective nor open minded in this case. This set the stage for the next two days of trial. This is an abuse of power. Ms. Gazala Fifth Amendment rights were already challenged.

Rule 2.3. Bias, Prejudice, and Harassment.

(B) A judge shall not, in the performance of judicial duties, by words or conduct manifest bias or prejudice, or engage in harassment, including but not limited to bias, prejudice, or harassment based upon race, sex, gender, religion, national origin, ethnicity, disability, age, sexual orientation, marital status, socioeconomic status, or political affiliation, and shall not permit court staff, court officials, or others subject to the judge's direction and control to do so.

On the first day of trial one hour and thirty minutes in. The discussion was about Ms. Gazala cultural and religious background and Judge Hughes asked Mrs. Steinkamp, PC, to "take it outside of child custody situation".... First of all you can't separate the mother from her cultural, religious beliefs, and secondly you can't remove the mother from a child custody situation, this is why we are in court. This discrimination and prejudice of Ms. Gazala culture, beliefs, religion and sex, due to being able produce children, all of which should be taken into consideration of who she is when determining a child custody matter. A label and bias was subjected upon Ms. Gazala unfairly. Judge Hughes should have recused herself at that instant. Ms. Gazala legal rights as a mother have been stripped from her due to opinions.

(C) A judge shall require lawyers in proceedings before the court to refrain from manifesting bias or prejudice, or engaging in harassment, based upon attributes including, but not limited to, race, sex, gender, religion, national origin, ethnicity, disability, age, sexual orientation, marital status, socioeconomic status, or political affiliation, against parties, witnesses, lawyers, or others.

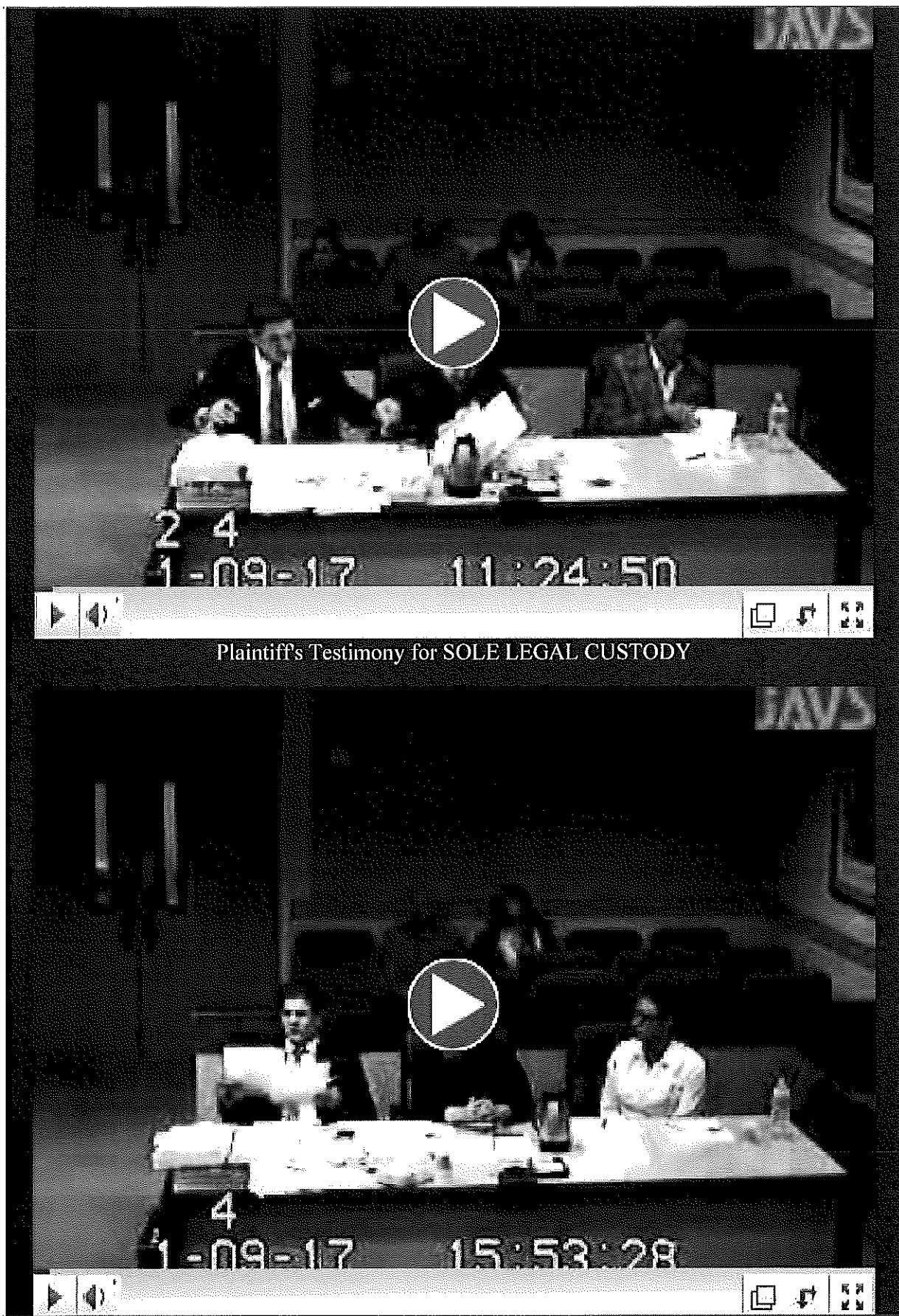
[1] A judge who manifests bias or prejudice in a proceeding impairs the fairness of the proceeding and brings the judiciary into disrepute.

[2] Examples of manifestations of bias or prejudice include but are not limited to epithets; slurs; demeaning nicknames; negative stereotyping; attempted humor based upon stereotypes; threatening, intimidating, or hostile acts; suggestions of connections between race, ethnicity, or nationality and crime; and irrelevant references to personal characteristics. Even facial expressions and body language can convey to parties and lawyers in the proceeding, jurors, the media, and others an appearance of bias or prejudice. A judge must avoid conduct that may reasonably be perceived as prejudiced or biased.

[3] Harassment, as referred to in paragraphs (B) and (C), is verbal or physical conduct that denigrates or shows hostility or aversion toward a person on bases such as race, sex, gender, religion, national origin, ethnicity, disability, age, sexual orientation, marital status, socioeconomic status, or political affiliation.

[4] Sexual harassment includes but is not limited to sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature that is unwelcome.

To all the mothers who have lost their children to this corrupt judge. Please help provide us with a fair and just ruling with another judge who is objective and compassionate.



Plaintiff's Testimony for SOLE LEGAL CUSTODY

Rule 2.5. Competence, Diligence, and Cooperation.

(A) A judge shall perform judicial and administrative duties competently and diligently.

[1] Competence in the performance of judicial duties requires the legal knowledge, skill, thoroughness, and preparation reasonably necessary to perform a judge's responsibilities of judicial office.

[2] A judge should seek the necessary docket time, court staff, expertise, and resources to discharge all adjudicative and administrative responsibilities.

[3] Prompt disposition of the court's business requires a judge to devote adequate time to judicial duties, to be punctual in attending court and expeditious in determining matters under submission, and to take reasonable measures to ensure that court officials, litigants, and their lawyers cooperate with the judge to that end.

[4] In disposing of matters promptly and efficiently, a judge must demonstrate due regard for the rights of parties to be heard and to have issues resolved without unnecessary cost or delay. A judge should monitor and supervise cases in ways that reduce or eliminate dilatory practices, avoidable delays, and unnecessary costs.

The entire trial was riddled with bias and the Judge's Final Decision is a mirror of that bias. Ms. Gazala have been a public servant to the County for over 13 years, teaching children since age 17. She have a 23 year old whom she has raised. She have no convictions or criminal records. She have more legal rights with the children she teach (whose parents respect and trust her with their child/ren more than her ex-husband does with their daughter) and yet she was stripped of her motherly rights (legal custody of her daughter) and treated worse and have less rights than a parent with a serious conviction.

Judge Hughes is to represent the highest level of ethical conduct and to uphold the law in a fair, just and objective manner. Her character in court during those 3 days of trial was unprofessional, disturbing and abuse of power to say the least. Using the Parenting Coordinator (PC), who according the PC Master Handbook, to decided who is the better parent, is providing a "custodial evaluation" which the PC has no right to do according to code 6.0 The Parenting Coordinator Limitations, 6.1. The PC will not play the role of a "custody evaluator". And yet Judge Hughes requested the PC provide custodial evaluation in the courtroom, which is also an abuse of power.

The Judge accepted hearsay instead of considering facts, accusing Ms. Gazala in her final decision of being pulled over by a police officer and refusing to give the officer.

her ID. If the Judge had done her job correctly, by thoroughly reviewing all the facts she would have found that Ms. Gazala and her daughter were in a car accident and not pulled over by an officer.

Again, Judge Hughes has difficulty reviewing all the facts thoroughly, impartially, and objectively.

Even though the judge should not have used the PC for Custodial Evaluations purposes, the Parenting coordinators final testimony was that; with counseling from both parents, there is no reason why 50/50 custody should not continue. Judge Hughes did not take the PC's final testimony into consideration for her final decision yet instead used other bias remarks (taking the mother and her culture, religion and beliefs out the child custody situation) from the PC to form her biased judgement.

Judge Hughes used the PC's statement that dad has a special relationship with his daughter. What exactly are these assumptions based on? Ms. Gazala was clearly discriminated against and only one side is considered. Ms. Gazala relationship with her daughter is just as special as dads, but these facts were not considered. Judge Hughes would not have concluded that only dad has a special relationship had she reviewed all the facts thoroughly and objectively.

Judge Hughes has done a poor job at objectively going through all the facts of this case. She formed biased opinions long ago and it showed clearly on video during the 3 days of trial hearings and in her Final Decision. Again, Judge Hughes set the stage for trial with her bias and inability to objectively review ALL facts and testimonies fairly, my testimony being a partial one.



Rule 2.1. Giving Precedence to the Duties of Judicial Office.

The duties of judicial office, as prescribed by law, shall take precedence over all of a judge's personal and extrajudicial activities.

The last day of trial occurred on March 20th 2017. Considering Judge Hughes already forged a bias against Ms. Gazala the first day of trial on January 9th 2017, the judge then waits until July 24th 2017 to provide a final judgement which granted her ex-husband (dad) sole custody of their daughter. Waiting several months to provide a final decision was not necessary when Judge Hughes's decision was already made when she forged her bias on day one.

Judge Hughes takes long periods of time to make decisions in her cases. There are people's lives on hold waiting for Judge Hughes to get back to them in a timely manner.

[1] To ensure that judges are available to fulfill their judicial duties, judges must conduct their personal and extrajudicial activities to minimize the risk of conflicts that would result in frequent disqualification. See Canon 3.

[2] Although it is not a duty of judicial office unless prescribed by law, judges are encouraged to participate in activities that promote public understanding of and

confidence in the justice system.

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From: Veterans In Politics International Inc. <devildog1285@cs.com>
Sent: Saturday, December 02, 2017 3:31 PM
To: JVA Group
Subject: Al Kramer & Stavros Anthony & Jason Brooks to appear on the Veterans In Politics video Talk-show

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Hi, just a reminder that you're receiving this email because you have expressed an interest in Veterans In Politics International Inc.. Don't forget to add devildog1285@cs.com to your address book so we'll be sure to land in your inbox!

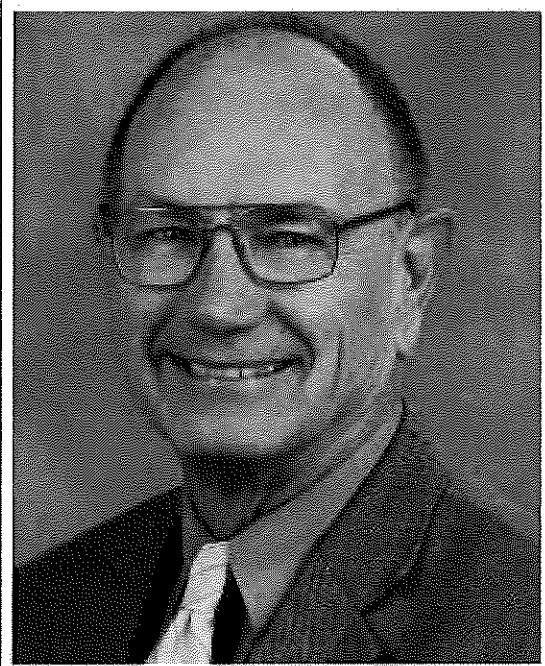
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Al Kramer & Stavros Anthony & Jason Brooks to appear on the Veterans In Politics video talk-show

Call into the show (702) 838-0696





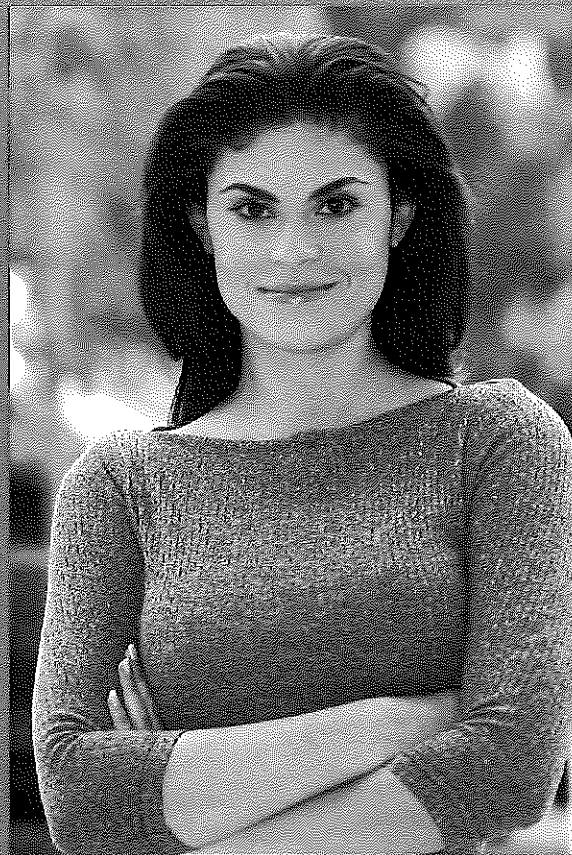
Al Kramer Nevada State
Assemblyman District 40



Stavros Anthony Las
Vegas City
Councilman/candidate
for Nevada's 4th
Congressional District



Jason Brooks Administrator and
Recruiter for Counter Terrorism
Training



Our New Co-Host
Lena Ocasio

Veterans In Politics proudly announces **Al Kramer** Nevada State Assemblyman District 40 and **Stavros Anthony** Las Vegas City Councilman/candidate for Nevada's 4th Congressional District and **Jason Brooks** Administrator and Recruiter for Counter Terrorism Training , all will appear as a special guests on the Veterans In Politics internet video talk-show **Saturday December 9, 2017.**

FIND OUT MORE

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



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


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

Contact Us at 702 283 8088

We need leaders
not in love
with money
but in love
with justice
Not in love
with publicity
but in love
with humanity



Show Archive on World Wide
Digital Broadcast




Christmas Gifts For
CHILD HAVEN &
ST. JUDE'S RANCH
FOR CHILDREN

December
2nd & 3rd
WAL-MART
8060 W. Tropical Parkway

9th & 10th
WAL-MART
6973 Blue Diamond Road

help us 8am - 4pm
FILL THE BUS



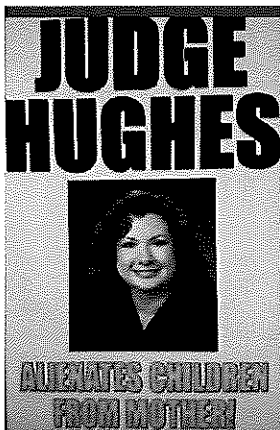
We are proud to announce that
our website familycourtwar.com
is now live.

Litigants Corner

How to Stop Court Crimes



Impeach Family Court Judge Rena Hughes



CLICK HERE TO SIGN THE PETITION: Impeach Family Court Judge Rena Hughes

Another Appeal Filed Against Family Court Judge Rena Hughes



Electronically Filed
Oct 13 2018 09:57 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

CLICK HERE TO VIEW the appeal:

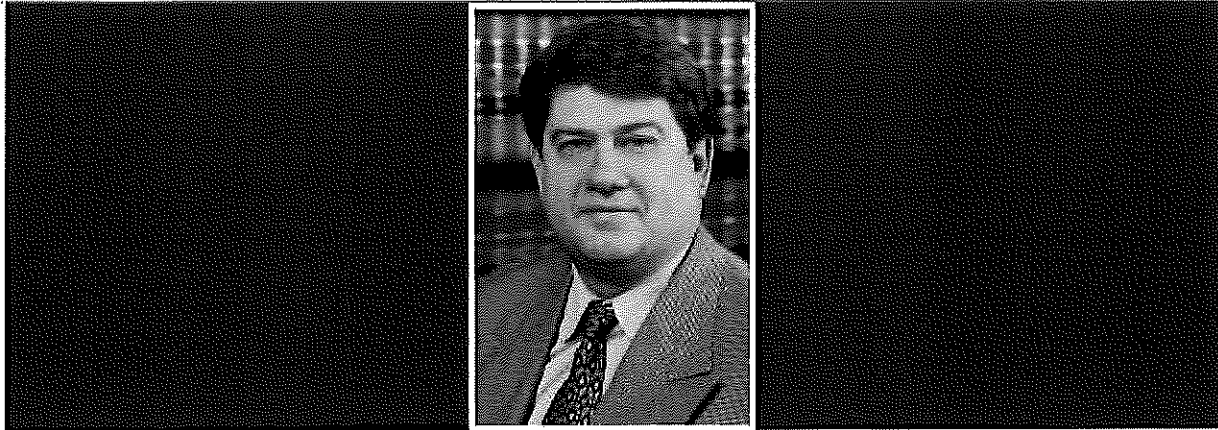
**Clark County Family Court Judge; retention, prediction from NOW
until November 2020 elections:**

1. Art Richie ? - stay
- (2.) Bill Joy - history
3. Linda Marquis - history
- (4.) Rebecca Burton - stay
5. Robert Teuton - retiring
6. Charles Hoskin - ?
7. Denis Gentine - history
8. Cynthia Steel - retiring
9. Cheryl Moss - retiring
10. Rena Hughes - history
- (11.) Cynthia Giuliani - stay
12. Jennifer Elliot - retiring
13. William Potter - history
14. Mathew Karter - history
15. Frank Sullivan - retiring
16. Sandra Pomrenze - retiring
17. Bryce Duckworth - history
- (18.) Bill Henderson - stay
19. Vincent Ochoa - history
- (20.) Lisa Brown - stay

List subject to change as we move forward:

Opinion Corner

Prominent Las Vegas attorney Cal Potter dies at 64



[CLICK HERE TO VIEW Las Vegas Review Journal Article:](#)

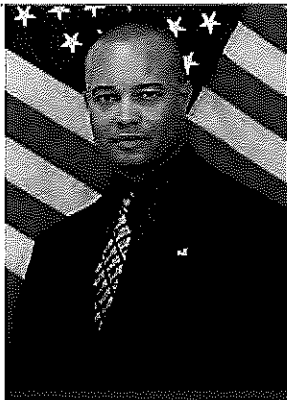
**ATTENTION ANYONE THAT IS THINKING ABOUT A DIVORCE
DON'T LET A JUDGE DECIDE!**

If you are considering a divorce, custody and property division, no matter how angry you are at the mother or father of your children, your husband or wife. Get yourself a paralegal and work together on an agreed upon arrangement. Then file it with family court and get it resolved this way.

Doing this will save you money, time, aggravation and stress. Putting you in charge of your life and your children's lives' instead of leaving this up to a Family Court Judge that will destroy and bankrupt you for years to come.

I promise you this is not a JOKE.

I have experienced families in the courtroom that have been horrified from one judge to another from one attorney to another. Don't place yourself and your family through this horror.



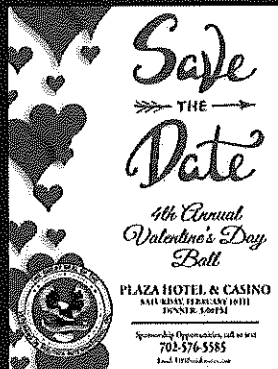
Steve Sanson

President of Veterans In Politics International

702 283 8088

Vipipresident@cs.com

Veterans In Politics Valentine's Day Ball Event



Click here to get your tickets NOW!

War Declared On the Clark County Family Court System

Nevada's Secret Court's

"Lets save our children"

Join Our Movement to Fight Corruption within the Clark County Family Court



Join our Facebook page: War Declared Against the
Clark County Family Court System or
www.FamilyCourtWar.com

facebook



He Defended Us, Let's Defend Him!

Veterans In Politics International, Inc. (TM)

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



Become a member at
www.VeteransInPolitics.org

facebook

To learn more click [here](#)

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

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

Jordan Ross Constable, Laughlin Township and Mark Bailus
Clark County District Court Judge Department 18 and Lindsey
Licari a discussion on starting a foundation for cancer survivors:
Aydens Army of Angels, all will appear as a special guests on the
Veterans In Politics internet video talk-show

Rant on Danny Tarkanian candidate for US Senate

(Click onto the video below)



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

Vegas, NV. 89126





HELP Nevada Families!

We Are A Government Watchdog!

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

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

And that's just the "short list!"



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

Call: Steve Sanson at 702-283-8088

Email: vipipresident@cs.com

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

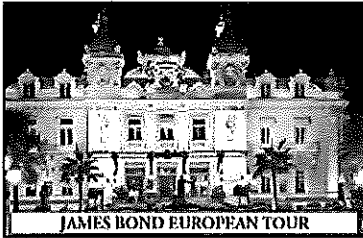
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War Declared On Clark County Family Court System



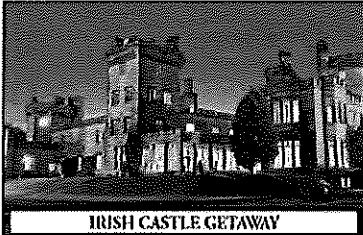
Get YOURNEWS here

[Click here to get your tickets NOW!](#)

*Silent Auction
Getaways For Two*



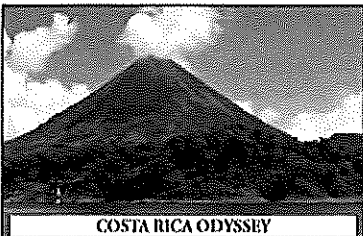
JAMES BOND EUROPEAN TOUR



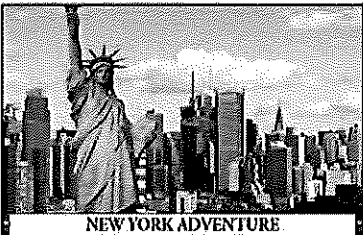
IRISH CASTLE GETAWAY



TOUR OF TUSCANY



COSTA RICA ODYSSEY



NEW YORK ADVENTURE

These and many more silent auction
adventures available at the event.
All proceeds benefit the work of
Veterans In Politics International.

Save → THE → Date

*4th Annual
Valentine's Day Ball*

PLAZA HOTEL & CASINO

SATURDAY, FEBRUARY 10TH

DINNER: 5:00PM

Sponsorship Opportunities,
Call or Text

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Email: veteransinpol@aol.com



Our YouTube Channel

[WAR declared on Clark County
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EXHIBIT 4

EXHIBIT 4

EXHIBIT 4

LAS VEGAS SHOOTING UPDATES ([HTTPS://WWW.REVIEWJOURNAL.COM/LAS-VEGAS-SHOOTING/](https://www.reviewjournal.com/las-vegas-shooting/))

THE FALLEN: THOSE WHO DIED (/VICTIMS-OF-THE-LAS-VEGAS-ROUTE-91-HARVEST-FESTIVAL-SHOOTING/)

Connect with other survivors of the Las Vegas shooting > [Click Here \(https://www.reviewjournal.com/survivorsconnection/\)](https://www.reviewjournal.com/survivorsconnection/)

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>> [News Columns \(https://www.reviewjournal.com/.news/news-columns/\)](https://www.reviewjournal.com/.news/news-columns/)

>> [Jane Ann Morrison \(https://www.reviewjournal.com/.news/news-columns/jane-ann-morrison/\)](https://www.reviewjournal.com/.news/news-columns/jane-ann-morrison/)

Judges' ties with Sanson have courts in tight spot



By Jane Ann Morrison Las Vegas Review-Journal
January 20, 2018 - 11:19 pm



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<https://www.reviewjournal.cc/post/1291870>

Internet radio show host, self-proclaimed veterans advocate and judicial endorser Steve Sanson is in a legal no man's land.

Sanson's years of providing District Court judges with free advertising — and judges foolishly appearing on his show and pursuing his political support — are now working against him.

Local judges don't want to hear a defamation lawsuit filed against the social media and email bomb thrower.

Seven District Court judges have recused themselves from his defamation case. Elissa Cadish, Jim Crockett, David Jones and Valerie Adair were the first to say they wouldn't hear his case, some citing the Nevada Code of Judicial Ethics.

Judge Kerry Earley issued a minute order taking herself off the case "to avoid the appearance of impropriety and implied bias" because she knows Sanson.

Judge Adriana Escobar did the same, citing "a professional relationship" with Sanson during previous campaigns, including the endorsement of his organization, Veterans in Politics International.

One judge, Mark Bailus, a newbie who was appointed to the bench in May 2017, showed incredibly poor judgment. Bailus appeared on Sanson's show even though he was hearing the defamation case Las Vegas attorney Marshal Willick filed against Sanson a year ago.

When Sanson's case was assigned to him, he initially insisted he would not be biased. Later he conceded he should take himself off the case, so Chief Judge Elizabeth Gonzalez did it for him.

Willick alleged that Sanson and Veterans in Politics International have a "continuing campaign of malicious, false and/or misleading statements regarding (Willick's) reputation and business."

Willick wanted the case assigned to a senior judge who doesn't have to run for election and won't be intimidated by Sanson's antics. Sanson fought to keep Bailus on the defamation case. It's clear now that Sanson won't be able to leverage his relationships with judges to obtain favorable treatment in court.

Veterans in Politics, which many years ago was a nonprofit, is now Veterans in Politics International, a for-profit organization because of its political activism. Sanson is president.

Because it's no longer a nonprofit, it doesn't have to file documents that report income and how revenues are spent. It's Sanson's business, and he describes himself as "president and owner." He says on his website it's a 100 percent all-volunteer operation.

But how many people who donate to Veterans in Politics International realize it's no longer a nonprofit and hasn't been for about six years? How many voters realize that Sanson's endorsements are, in fact, a business plan?

There's a lot of smoke surrounding Sanson, whose big fundraiser is Feb. 10, a Valentine's Day event at the Plaza. Expect some judges to be in attendance.

Folks paying \$125 each or \$1,000 for a table for eight need to know they can't deduct it on their taxes. Don't be fooled by his website, veteransinpolitics.org (<https://veteransinpolitics.org/>). A dot-org URL can be used by for-profit entities, but the public typically does not make that association. Don't expect Sanson to change the domain name to a dot-com to better reflect that he's operating a business.

Sanson is a friend to some elected officials and a foe to others. He sees himself as a political power player. Plenty of veterans and political figures see him as a poser.

He cozies up to politicians, claiming that his endorsements are powerful in the veterans community. He can be a vicious enemy as well, filing multiple complaints against judges who ignore him and won't go on his show. He bashes some judges and endorses others on his radio show.

In August, Family Court Judge Bryce Duckworth accused Sanson of trying to intimidate him and took himself off a divorce and child custody case (<https://www.reviewjournal.com/local/local-las-vegas/family-court-judge-accuses-agitator-steve-sanson-of-intimidation/>) after Sanson, who was not a party in the matter, tried to contact him directly about the case.

Duckworth made a finding I agree with 100 percent: "Notwithstanding his self-proclaimed faux cover of seeking to 'expose injustice and corruption,' Mr. Sanson's sole motivation for communicating with this Court was to intimidate and harass the Court."

Sanson is riding on the backs of veterans to give himself a political profile. In September, I wrote about his four failures to become an elected official himself (<https://www.reviewjournal.com/news/news-columns/jane-ann-morrison/sansons-latest-complaint-like-him-a-political-loser/>).

Several people have said Sanson needs to be investigated, including Duckworth. You'd think his request would have some clout with the proper agency.

At least two other men have also asked government officials to investigate Sanson. Mark DiCiero, a former longtime local morning radio personality, and attorney Stephen Stubbs have urged scrutiny of Sanson.



Veterans Award Ceremony at the Plaza Hotel & Casino



Officiated the Ceremony: Commissioner Steve Sisolak

Recipients of the Award:

Cpl. Mike Edwards USMC
Cpl. Tom Martin USMC
Staff Sgt. Jason Brooks USMC
Sgt. Kaine Marzola USMC
Sgt. Tevin Flores USA
PFC. Benjamin Visser USA

Pvt. Ayleen Ortega USA

Litigants Corner



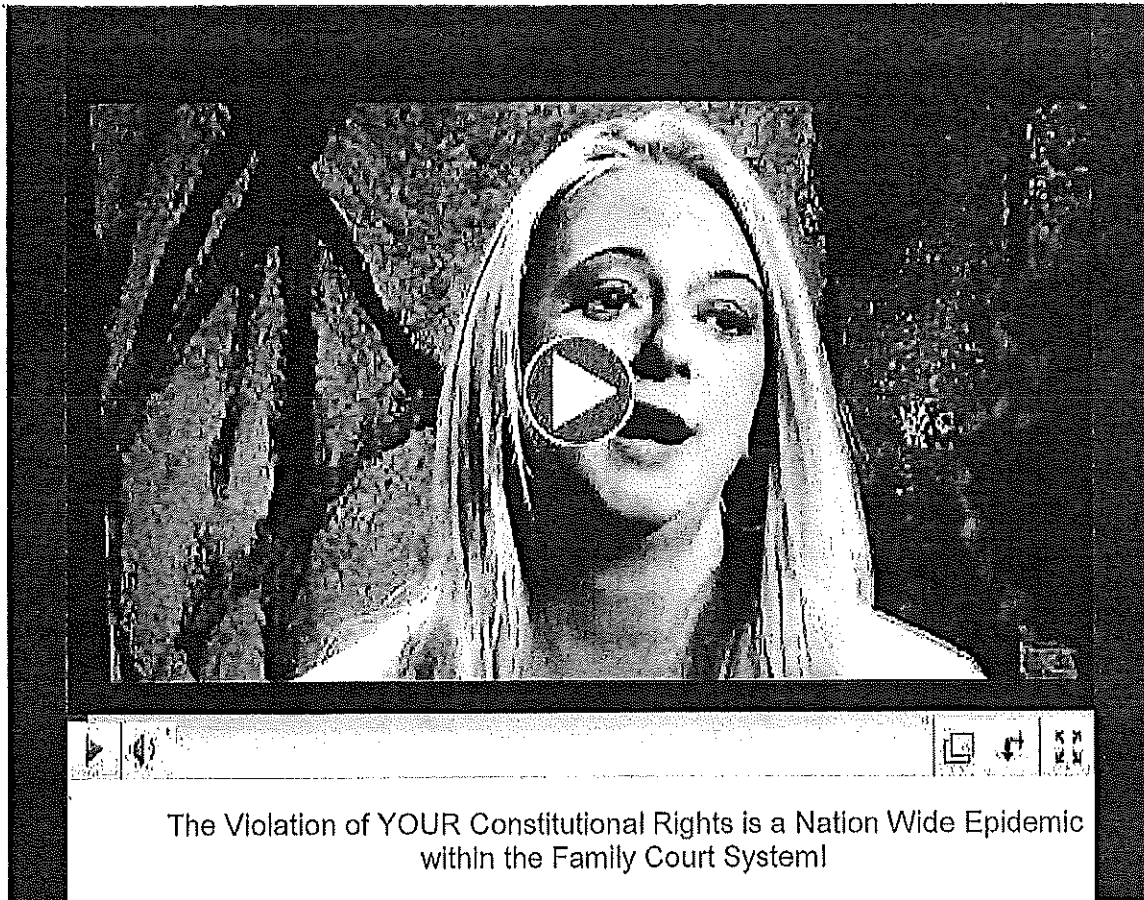
The taken of children from loving, caring, responsible parents will
come to a drastic **END!**

Against a **CORRUPT** Family Court System that's driven by money,
power and association.

This is a **CIVIL DEATH!** WE want to hear your story.

**It's up to us to let the System know
that they are **NOT** above the law.**

Must see news footage:



Opinion Corner

**THE ONLY
PEOPLE WHO
ARE MAD AT
YOU FOR
SPEAKING THE
TRUTH ARE
THOSE PEOPLE
WHO ARE
LIVING A LIE.**

**KEEP SPEAKING
THE TRUTH**



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EXHIBIT 8

EXHIBIT 8

EXHIBIT 8

Trash  From: Mark DiCiero To: BailusM@clarkcountycourts.us  Hide**Veterans in Politics**

Today at 10:55 AM

Judge Bailus,

I noticed that you are schedule to appear on Steve Sanson's Veterans in Politics internet show this afternoon.

It is my understanding that you are currently presiding over a case involving Mr. Sanson and a local attorney. As such, I am concerned about the appearance of impropriety that would exist by appearing on the show.

I am also concerned that the scheduling arrangements may have been made by way of ex parte communication between yourself and Mr. Sanson.



Trash



It is my understanding that you are currently presiding over a case involving Mr. Sanson and a local attorney. As such, I am concerned about the appearance of impropriety that would exist by appearing on the show.

I am also concerned that the scheduling arrangements may have been made by way of ex parte communication between yourself and Mr. Sanson.

I would respectfully request that you cancel your appearance and reschedule at a more appropriate time.

Kind regards,

Mark

Mark DiCiero

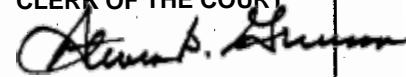
702.743.3338

mark.diciero@gmail.com



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

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; VETERAN'S IN
POLITICS INTERNATIONAL, INC;
SANSON CORPORATION; KAREN
STEELMON; and DOES I through X,

Defendant.

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

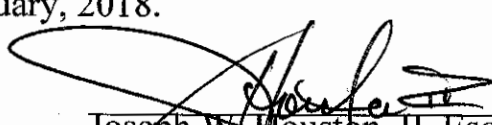
Date of Hearing: 2/12/2018
Time of Hearing: 8:30 AM

Oral Argument Is Requested

AFFIDAVIT OF COUNSEL CAL J. POTTER, IV. ESQ.

See attached.

Dated this 26 day of January, 2018.



Joseph W. Houston, II, Esq.
State Bar #1440
430 South 7th Street
Las Vegas, Nevada 89101
(702) 982-1200
Attorney for Defendants
LOUIS C. SCHNEIDER, individually
and LAW OFFICE OF LOUIS C.
SCHNEIDER, LLC

JVA001371

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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Joseph W. Houston, II, Esq. and that on the 20th day of January, 2018 I served a true and correct copy of the above and forgoing Reply to Plaintiffs' Opposition to Defendants' Motion for Attorney's Fees, Costs and Sanctions on the parties addressed as shown below:

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

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

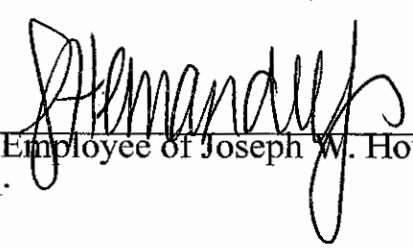
Marshal S. Willick, Esq. (Nevada Bar No. 2515)
WILLICK LAW GROUP
3591 E. Bonanza Road
Las Vegas, Nevada 89110

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

 X Via Electronic Service [NEFR Rule 9]

 Via facsimile [EDCR 7.26(a)]

 Via U.S. Mail (NRCP 5(b))


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

AFFIDAVIT OF COUNSEL CAL J. POTTER, IV, ESQ.

STATE OF Nevada)
) ss.
COUNTY OF Clark)

Cal J. Potter, IV, being first duly sworn, deposes and says:

1. That C. J. Potter, IV, Esq. is a member in good standing of the State Bar of Nevada and admitted to practice in the Nevada Supreme Court, the U.S. District Courts of Nevada, and the Ninth Circuit Court of Appeals;

2. That Your Affiant relies on his Declaration of September 12, 2017, wherein he delineates the qualifications of attorneys and paralegals of Potter Law Offices, and the hourly fees thereof;

3. That your Affiant has conducted a review of the Timeslips Slip Listing for the representation of Louis Schneider in the matter styled, Abrams, et al. v. Schneider, et al., Clark County District Court Case No. A-17-749318-C;

4. That Your Affiant affirms that the attached Timeslips Slip Listing is a true and accurate record of the work of C. J. Potter, IV, Esq., Cal J. Potter, III, Esq. and their paralegals in this matter;

5. That in his Declaration of September 12, 2017, Your Affiant declared hours of 189.4 and \$80,495.00 in fees in this matter, which were the totals relayed to counsel by the billing administrator at Potter Law Offices;

6. That said previously declared total fees also includes the retainer in the amount of \$5,000.00;

7. That Your Affiant has reviewed the attached Timeslips Slip Listing showing that the attorneys and paralegals expended 189.35 hours and \$80,493.94 (\$75,474.94 plus \$5,000.00 retainer) in fees and \$19.00 costs advanced working on this matter;

8. That the \$19.00 in costs advanced for filing fees should be deducted to reflect that Potter Law Offices expended \$80,474.94 in fees;

9. The fees set forth herein were actually and necessarily incurred and were reasonable;


10. Your Affiant affirms under the penalty of perjury that the foregoing is true and correct.

Your Affiant sayeth naught.

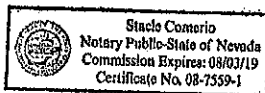


CAL J. POTTER, IV, ESQ.

SUBSCRIBED and SWORN to before me
This 20th day of January, 2018.



Notary Public, In and For Said
County and State



Selection Criteria

Clie.Selection Include: Schneider, Louis
 Slip.Classification Open

Rate Info - identifies rate source and level

Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
82250	TIME			CJP	0.12	500.00	58.33
	1/18/2017			T/C w/ Client	0.00	T	
	WIP			Schneider, Louis	0.00		
			Telephone conference with Client		0.00		
82251	TIME			CJP	4.50	500.00	2250.00
	1/19/2017			Review	0.00	T	
	WIP			Schneider, Louis	0.00		
			Review COMP, analysis of defenses, research anti-SLAPP law		0.00		
82295	TIME			CJ	2.67	350.00	933.33
	1/19/2017			Conf w/	0.00	T	
	WIP			Schneider, Louis	0.00		
			Conference with CJP re: anti-SLAPP law		0.00		
82256	TIME			CJP	2.00	500.00	1000.00
	1/20/2017			Review	0.00	T	
	WIP			Schneider, Louis	0.00		
			Review Family Court matter (preliminary)		0.00		
81112	EXP			KH	1	5000.00	5000.00
	1/23/2017			Retainer			
	Billed	G:15512	5/3/2017	Schneider, Louis			
	Retainer:						
82261	TIME			CJP	0.50	500.00	250.00
	1/23/2017			T/C w/ Client	0.00	T	
	WIP			Schneider, Louis	0.00		
			Telephone conference with Client		0.00		
82288	TIME			CJP	1.83	500.00	916.67
	1/23/2017			Conf w/ client	0.00	T	
	WIP			Schneider, Louis	0.00		
			Conference with client re: COMP, representation		0.00		
82252	TIME			TB	1.83	125.00	229.17
	1/24/2017		1/25/2017	Draft	0.00	T@1	
	WIP			Schneider, Louis	0.00		
	Draft SUBT				0.00		

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Slip ID	Dates and Time	Timekeeper Activity	Units	Rate	Slip Value
Posting Status		Client	DNB Time	Rate Info	
Description		Reference	Est. Time	Bill Status	
			Variance		
82293	TIME	TB	1.83	125.00	229.17
1/25/2017		Conf w/	0.00	T@1	
WIP		Schneider, Louis	0.00		
Conference with CJP			0.00		
82254	TIME	CJ	1.33	350.00	466.67
1/27/2017		Review & sign	0.00	T	
WIP		Schneider, Louis	0.00		
Review and sign SUBT			0.00		
82255	TIME	CJP	2.67	500.00	1333.33
1/27/2017		Review	0.00	T	
WIP		Schneider, Louis	0.00		
Review and research			0.00		
82294	TIME	TB	4.17	125.00	520.83
1/27/2017		Prepare	0.00	T@1	
WIP		Schneider, Louis	0.00		
Prepare/research/assist MTD			0.00		
82296	TIME	CJ	4.50	350.00	1575.00
1/27/2017		Research	0.00	T	
WIP		Schneider, Louis	0.00		
Research Anti-SLAPP law, analysis of case, and drafting of MTD			0.00		
82321	TIME	TB	2.50	125.00	312.50
1/27/2017		Organize	0.00	T@1	
WIP		Schneider, Louis	0.00		
Organize file and efile, preliminary			0.00		
82326	TIME	TB	2.17	125.00	270.83
1/27/2017		Misc	0.00	T@1	
WIP		Schneider, Louis	0.00		
: file review, confer with file clerk, review S-drive/efile			0.00		
82260	TIME	CJP	6.33	500.00	3166.67
1/28/2017		Review	0.00	T	
WIP		Schneider, Louis	0.00		
Review and draft Spec MTD			0.00		
82292	TIME	CJP	2.83	500.00	1416.67
1/29/2017		Revision of	0.00	T	
WIP		Schneider, Louis	0.00		
Revision of motion			0.00		
81135	EXP	KH	1	3.50	3.50
1/30/2017		filing fee			
Billed	G:15512	5/3/2017 Schneider, Louis			
Cost Re: Filing Cost for MDSM					

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity	Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
81258	1/30/2017	EXP	Billed	KH	Photocopy Docs	34	0.25	8.50
			Cost Re: Photocopy Documents MTN Dismiss		Schneider, Louis			
82253	1/30/2017	TIME	WIP	TB	Filing	0.67	125.00	83.33
			Filing:efile SUBT, MTD		Schneider, Louis	0.00	T@1	
						0.00		
						0.00		
82257	1/30/2017	TIME	WIP	CJP	Review	1.67	500.00	833.33
			Review Family Court matter, continued		Schneider, Louis	0.00	T	
						0.00		
						0.00		
82259	1/30/2017	TIME	WIP	CJP	Research	8.67	500.00	4333.33
			Research and draft Spec MTD		Schneider, Louis	0.00	T	
						0.00		
						0.00		
82263	1/30/2017	TIME	WIP	CJP	Review	1.67	500.00	833.33
			Review ACOM, Mot OSC		Schneider, Louis	0.00	T	
						0.00		
						0.00		
82297	1/30/2017	TIME	WIP	CJ	Finalize	3.83	350.00	1341.67
			Finalize MTD		Schneider, Louis	0.00	T	
						0.00		
						0.00		
82258	1/31/2017	TIME	WIP	CJP	Review	8.33	500.00	4166.67
			Review of complete Saiter file, consisting of 138 separate documents		Schneider, Louis	0.00	T	
						0.00		
						0.00		
82262	2/1/2017	TIME	WIP	CJP	Research	1.67	500.00	833.33
			Research/review RICO Authority		Schneider, Louis	0.00	T	
						0.00		
						0.00		
82298	2/1/2017	TIME	WIP	CJP	Review	7.00	500.00	3500.00
			Review of 138 documents of complete Saiter file, continued		Schneider, Louis	0.00	T	
						0.00		
						0.00		
82322	2/1/2017	TIME	WIP	TB	Review	2.17	125.00	270.83
			Review file, preliminary		Schneider, Louis	0.00	T@1	
						0.00		
						0.00		

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Slip ID	Timekeeper	Units	Rate	Slip Value	
Dates and Time	Activity	DNB Time	Rate Info		
Posting Status	Client	Est. Time	Bill Status		
Description	Reference	Variance			
82299	TIME	CJP	5.50	500.00	2750.00
2/2/2017	Review	0.00	T		
WIP	Schneider, Louis	0.00			
Review of complete Saiter file, continued		0.00			
82300	TIME	CJP	6.67	500.00	3333.33
2/3/2017	Review	0.00	T		
WIP	Schneider, Louis	0.00			
Review of complete Saiter file, continued		0.00			
82323	TIME	TB	1.50	125.00	187.50
2/3/2017	Organize	0.00	T@1		
WIP	Schneider, Louis	0.00			
Organize file, S-drive file, continued		0.00			
82301	TIME	CJP	4.17	500.00	2083.33
2/4/2017	Review	0.00	T		
WIP	Schneider, Louis	0.00			
Review and analysis of ACOM, which included LS in all COAs despite any factual allegations		0.00			
82302	TIME	CJ	2.83	350.00	991.67
2/4/2017	Conf w/	0.00	T		
WIP	Schneider, Louis	0.00			
Conference with CJP re: ACOM and videos of Saiter oral arguments/hearings		0.00			
82266	TIME	CJP	2.17	500.00	1083.33
2/15/2017	Review	0.00	T		
WIP	Schneider, Louis	0.00			
Review Def. OPPS and CounterMtn		0.00			
82269	TIME	CJP	1.17	500.00	583.33
2/24/2017	Review	0.00	T		
WIP	Schneider, Louis	0.00			
Review Def. Amended Exh.		0.00			
82276	TIME	CJ	2.17	350.00	758.33
2/27/2017	Review	0.00	T		
WIP	Schneider, Louis	0.00			
[No description]		0.00			
82280	TIME	CJP	0.50	500.00	250.00
2/27/2017	Review	0.00	T		
WIP	Schneider, Louis	0.00			
Review Winkler letter		0.00			
82303	TIME	CJ	2.33	350.00	816.67
2/28/2017	Review	0.00	T		
WIP	Schneider, Louis	0.00			
Review of telephone conference with defense counsel Carlos Morales, and responding to his		0.00			

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
material misrepresentations					
82304	TIME	CJ	0.33	350.00	116.67
3/3/2017		Schedule	0.00	T	
WIP		Schneider, Louis	0.00		
/reschedule hearing Mtn Strike			0.00		
82305	TIME	CJ	2.67	350.00	933.33
3/3/2017		Draft	0.00	T	
WIP		Schneider, Louis	0.00		
Draft OPPS (analysis of Def. Mtn Strike, research			0.00		
legal issues)					
82306	TIME	CJP	2.50	500.00	1250.00
3/4/2017		Review & Revise	0.00	T	
WIP		Schneider, Louis	0.00		
Review and Revise, notate draft OPPS			0.00		
82307	TIME	CJ	1.50	350.00	525.00
3/6/2017		Finalize	0.00	T	
WIP		Schneider, Louis	0.00		
Finalize OPPS			0.00		
82308	TIME	TB	1.17	125.00	145.83
3/6/2017		Filing	0.00	T@1	
WIP		Schneider, Louis	0.00		
Filing OPPS			0.00		
82289	TIME	CJP	2.00	500.00	1000.00
3/7/2017		Conf w/ client	0.00	T	
WIP		Schneider, Louis	0.00		
Conference with client			0.00		
82309	TIME	CJ	3.17	50.00	158.33
3/8/2017		Review	0.00	T	
WIP		Schneider, Louis	0.00		
Review response 42 pp. (analysis, identification of			0.00		
issues, research)					
82310	TIME	CJP	1.67	500.00	833.33
3/8/2017		Review	0.00	T	
WIP		Schneider, Louis	0.00		
Review Def. filing			0.00		
82264	TIME	CJP	1.50	500.00	750.00
3/16/2017		Research	0.00	T	
WIP		Schneider, Louis	0.00		
Research SLAPP			0.00		

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
82267	CJP	5.17	500.00	2583.33
3/25/2017	Complete	0.00	T	
WIP	Schneider, Louis	0.00		
Complete MTD and Req for Fees and Costs		0.00		
82311	CJ	2.50	350.00	875.00
3/25/2017	Draft	0.00	T	
WIP	Schneider, Louis	0.00		
Draft MTD and Req for Fees and Costs		0.00		
82268	CJP	3.50	500.00	1750.00
3/26/2017	Finalize	0.00	T	
WIP	Schneider, Louis	0.00		
MTD		0.00		
82324	TB	1.50	125.00	187.50
3/27/2017	Misc	0.00	T@1	
WIP	Schneider, Louis	0.00		
Miscellaneous: edit Draft Mtn		0.00		
82265	CJP	1.00	500.00	500.00
3/28/2017	Review	0.00	T	
WIP	Schneider, Louis	0.00		
Review Family Court matter: exhibit and Order to Vacate Seal		0.00		
82270	TB	1.17	125.00	145.83
3/28/2017	Filing	0.00	T@1	
WIP	Schneider, Louis	0.00		
Filing: efile MTD Slapp		0.00		
81526	KH	1	3.50	3.50
3/29/2017	filing fee			
Billed	Schneider, Louis			
Cost Re: Filing Cost FOR MDSM				
82281	CJP	0.67	500.00	333.33
3/30/2017	Review	0.00	T	
WIP	Schneider, Louis	0.00		
Review MM's Mtn to File		0.00		
82282	CJP	5.17	500.00	2583.33
4/27/2017	Review	0.00	T	
WIP	Schneider, Louis	0.00		
Review court transcript		0.00		
82325	TB	2.17	125.00	270.83
4/27/2017	Misc	0.00	T@1	
WIP	Schneider, Louis	0.00		
Miscellaneous: annotate transcript notes		0.00		

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity	Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
81716	EXP			KH		1	3.50	3.50
	6/1/2017			filing fee				
	Billed	G:15614		6/7/2017	Schneider, Louis			
	Cost Re:	Filing Cost JOIN						
82279	TIME			CJP		0.33	500.00	166.67
	6/1/2017			Finalize		0.00	T	
	WIP			Schneider, Louis		0.00		
	Finalize Joinder RPLY Mtn to Strike					0.00		
82312	TIME			CJ		1.17	350.00	408.33
	6/1/2017			Draft		0.00	T	
	WIP			Schneider, Louis		0.00		
	Draft Joinder RPLY Mtn Strike					0.00		
82313	TIME			TB		1.00	125.00	125.00
	6/1/2017			Filing		0.00	T@1	
	WIP			Schneider, Louis		0.00		
	Filing Joinder					0.00		
82278	TIME			TB		0.67	125.00	83.33
	6/2/2017			Memo to		0.00	T@1	
	WIP			Schneider, Louis		0.00		
	Memo to Rocha					0.00		
82290	TIME			CJP		1.83	500.00	916.67
	6/2/2017			Conf w/ client		0.00	T	
	WIP			Schneider, Louis		0.00		
	Conference with client re: motion hearing					0.00		
82327	TIME			TB		4.17	125.00	520.83
	6/2/2017			Misc		0.00	T@1	
	WIP			Schneider, Louis		0.00		
	Miscellaneous : review/edit/organize conference notes, case notes					0.00		
82314	TIME			CJP		8.17	500.00	4083.33
	6/4/2017			Conf w/		0.00	T	
	WIP			Schneider, Louis		0.00		
	Conference/preparation with CJ re: pending hearing, especially the inclusion of LS in all COAs without sufficient factual support and that all alleged defamatory statements we protected by litigations privilege					0.00		
82315	TIME			CJ		4.67	350.00	1633.33
	6/4/2017			Conf w/		0.00	T	
	WIP			Schneider, Louis		0.00		
	Conference with CJP, preparatory					0.00		

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Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value
Posting Status		Activity	DNB Time	Rate Info	
Description		Client	Est. Time	Bill Status	
		Reference	Variance		
82291	TIME	CJP	1.83	500.00	916.67
6/5/2017		Conf w/ client	0.00	T	
WIP		Schneider, Louis	0.00		
Conference with client re: Motions to Dismiss			0.00		
82316	TIME	CJP	4.67	500.00	2333.33
6/5/2017		Court App	0.00	T	
WIP		Schneider, Louis	0.00		
Court Appearance (preparation, argument)			0.00		
82317	TIME	CJP	1.17	500.00	583.33
6/6/2017		Review	0.00	T	
WIP		Schneider, Louis	0.00		
Review Supp OPPS			0.00		
82318	TIME	CJP	1.83	500.00	916.67
6/7/2017		Review	0.00	T	
WIP		Schneider, Louis	0.00		
Review/revisit for analysis of issues			0.00		
82319	TIME	CJP	1.52	500.00	758.33
6/8/2017		Prepare	0.00	T	
WIP		Schneider, Louis	0.00		
Prepare/draft RPLY			0.00		
82320	TIME	CJP	1.42	500.00	708.33
6/9/2017		Finalize	0.00	T	
WIP		Schneider, Louis	0.00		
Finalize pleading			0.00		
82328	TIME	TB	1.27	125.00	158.33
6/9/2017		Preparation of	0.00	T@1	
WIP		Schneider, Louis	0.00		
Preparation of meeting with CJ, case notes			0.00		
82329	TIME	CJ	0.80	250.00	200.00
6/9/2017		Conf w/	0.00	T@1	
WIP		Schneider, Louis	0.00		
Conference with TB			0.00		
82283	TIME	CJ	0.50	350.00	175.00
6/22/2017		Review	0.00	T	
WIP		Schneider, Louis	0.00		
Review court order			0.00		
82284	TIME	CJ	0.67	350.00	233.33
8/3/2017		Review	0.00	T	
WIP		Schneider, Louis	0.00		
Review court minutes			0.00		

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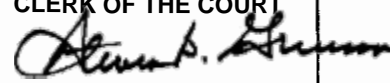
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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
82285	TIME	CJ	1.50	350.00	525.00
9/9/2017		Draft	0.00	T	
WIP		Schneider, Louis	0.00		
Draft Motion Fees and Sanctions			0.00		
82286	TIME	CJ	3.17	250.00	791.67
9/10/2017		Revision of	0.00	T@1	
WIP		Schneider, Louis	0.00		
Mtn			0.00		
82272	TIME	TB	0.33	125.00	41.67
9/15/2017		Filing	0.00	T@1	
WIP		Schneider, Louis	0.00		
Filing: efile Joinder to Sanson			0.00		
82287	TIME	CJ	0.83	350.00	291.67
9/15/2017		Finalize	0.00	T	
WIP		Schneider, Louis	0.00		
Finalize Mtn Joinder			0.00		
Grand Total					
		Billable	189.35		80493.94
		Unbillable	0.00		0.00
		Total	189.35		80493.94

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Attorney for Defendant
LOUIS C. SCHNEIDER, individually
and LAW OFFICE OF LOUIS C. SCHNEIDER, LLC.

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; VETERAN'S IN
POLITICS INTERNATIONAL, INC;
SANSON CORPORATION; KAREN
STEELMON; and DOES I through X,

Defendant.

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

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

Oral Argument Is Requested

OPPOSITION TO MOTION TO DISQUALIFY

COMES NOW, Defendants Louis C. Schneider, individually and the Law
Offices of Louis C. Schneider, LLC, by and through their attorney, Joseph W.
Houston, II, Esq., and files this Opposition to the Motion to Disqualify filed by
the Plaintiffs in this matter.

POINTS AND AUTHORITIES

FIRST, the only alleged factual allegations as to the Honorable Judge
Michelle Levitt continuing on the proceedings in this matter is a chart contained
on page 19 of the Plaintiffs' Motion, which alleges she gave \$300 to Veterans

1 in Politics International. On page 21, beginning at line 16 is an allegation that
2 this was done in 2008. The second allegation is that Veterans in Politics
3 International endorsed Michelle Leavitt (p. 21-16) but there is no where
4 contained in the Motion even what year that may have been, even if the
5 endorsement was for an election that she actually won.

6 The final factual allegation against Michelle Leavitt is that she attended a
7 Veterans in Politics event in 2013 (p. 21-16) but Judges are elected in the State
8 of Nevada, they attend events all the time especially when they are running for
9 election. There is nothing contained anywhere in the Motion as to what the
10 event was or how there is any knowledge that she even attended such an event.

11 These allegations do not support, even in the most remote way, factual
12 allegations sufficient to warrant Judge Leavitt from being disqualified in this
13 matter.

14 NRS 1.230 sets forth grounds for disqualifying District Court judges in
15 subsection (1) and (2):

16 "1. A judge shall not act as such in an action or proceeding when the
17 judge entertains actual bias or prejudice for or against one of the parties to the
18 action.

19 2. A judge shall not act as such in an action or proceeding when implied bias
20 exists in any of the following respects:

21 (a) When the judge is a party to or interested in the action or proceeding.

22 (b) When the judge is related to either party by consanguinity or affinity within
23 the third degree.

24 (c) When the judge has been attorney or counsel for either of the parties in the
25 particular action or proceeding before the court.

26 (d) When the judge is related to an attorney or counselor for either of the parties
27 by consanguinity or affinity within the third degree. This paragraph does not
28 apply to the presentation of ex parte or uncontested matters, except in fixing
fees for an attorney so related to the judge."

This alleged basis for disqualification do not constitute proof of showing
an actual bias or prejudice by Judge Leavitt either for or against either parties to
the action. Further they do not show any implied bias on the judge because the

1 judge is not a party to the action, there's not even any allegation that the judge
2 is personally interested in the action or proceeding, there is no allegation that
3 the judge is related to either party, there is no allegation that the judge has been
4 counsel for either of the parties and therefore, the Motion itself does not set
5 forth any factual basis for disqualification of Judge Leavitt.

6 SECOND, the Plaintiffs' also seek to disqualify judges who are not even
7 assigned to this case. Basically she is trying to disqualify all the District Court
8 Judges in Clark County, Nevada and there are no factual basis set forth for such
9 a disqualification, and certainly none that meet the requirements of the statute.
10 Further, there is no statutory ground or Nevada Supreme Court Case Law which
11 would allow a motion to disqualify all judges in a particular county from
12 hearing a particular case. This request is frivolous and there is no statutory law
13 or case law to support it.

14 THIRD, the motion seeks to disqualify the Chief Judge, Elizabeth
15 Gonzales from deciding the Motion to Disqualify, when again, there is no
16 factual basis or legal basis for this disqualification. There's not even any falsely
17 alleged facts which would constitute the grounds for disqualification as set forth
18 previously in NRS 1.230.

19 FOURTH, the Plaintiffs requested in their motion to the District Court,
20 that the Nevada Supreme Court should hear the Motion to Disqualify. Such a
21 request is in direct violation of Nevada Statute, NRS 1.235, as in subsection
22 (5)(b), sections (1) and (2) it states that a motion to disqualify should be decided
23 "...By the presiding judge in the judicial district in judicial districts having more
24 than 1 judge, or if the presiding judge of the judicial district is sought to be
25 disqualified, by the judge having the greatest number of years in service." and
26 in subsection (2), "By the Supreme Court in judicial districts having only one
27 judge." Clark County, Nevada has more than one judge. The statute specifically
28

1 forbids the Supreme Court from deciding on the motion to disqualify in the
2 Eighth Judicial District, so their request is legally frivolous.

3 The motion is without any factual basis or legal basis. An award of
4 attorney's fees should be made.

5 Pursuant to **Brunzell v. Golden Gate National Bank**, 85 Nev. 345
6 (1969), as to the quality of representation by Joseph W. Houston, II, Joseph W.
7 Houston, II has been practicing law for a period of in excess of 30 years. His
8 practice in Family Law has encompassed the majority of his practice since that
9 time including representation of the father in the case of **Arnold v. Arnold**
10 which first to give men equal rights to custody in the State of Nevada. Further,
11 he went to the Nevada Supreme Court in the case of **Barbagello v. Barbagello**
12 which set forth the initial standards as to the manner in which child support
13 would be determined once the Nevada Legislature set forth percentages in
14 regards thereto. Finally in the case of **Schwartz v. Schwartz** he appeared
15 before the Nevada Supreme Court arguing successfully as to the terms and
16 conditions to be utilized by the court in determining how they would apply the
17 legislative mandate that a party moving out-of-state must first have court
18 approval to do so or written consent of the opposing party.

19 CONCLUSION

20 It is requested that a ruling be made immediately on the pleadings of this
21 case, as Michelle Leavitt, who has already ruled that the Plaintiffs' Complaint
22 should be dismissed, has a hearing set on February 12, 2018 on the issue of
23 award of attorney's fees, which is mandatory based upon Judge Leavitt's ruling
24 pursuant to statute. Both the Schneider Defendants and the Sanson Defendants
25 are requesting attorney's fees which have been expended in the amount of
26 approximately \$80,000. Additionally, she has a right to award each of the
27 individual Defendants sanctions of up to \$10,000 each.
28

1 By filing this motion, which again, is factually and legally without any
2 merit, NRS 1.235 (5) would prevent even under these circumstances Judge
3 Leavitt from further proceedings on the case until such time that a ruling is
4 made on this motion.

5 Further, the motion itself is filed in violation of NRS 1.235 which sets
6 forth the procedure for disqualifying district court judges, as it requires that it
7 be filed 20 days before the date set for trial or hearing on the case and the
8 hearing has already occurred in June of 2017. (see minutes attached hereto as
9 **Exhibit A**) The statute has another option of 3 days before a date is set for any
10 hearing of any pretrial matter. Again, the motion to dismiss has already
11 occurred.

12 In subsection (2)(c) specifically provides that the motion must be filed
13 before "...any ruling (is) made in the trial or hearing." Again, the trial or hearing
14 has already occurred. The facts alleged appear to have occurred years and years
15 before the hearing occurred. NRS 1.235(2)(c) also provides that there may be
16 exceptions to time limits, but only before the actual hearing is held. As
17 subsection (2)(c) states:

18 " If the facts upon which disqualification of a judge is sought are not
19 known to the party before the party is notified of the assignment of the judge or
20 before any pretrial hearing is held, the affidavit may be filed **not later** than the
commencement of trial or hearing."

21 Thus, once the hearing commences and it is not only been commenced
(and its actually been concluded) then, there is no right at all to bring a motion
22 for disqualification pursuant to Nevada Statute.

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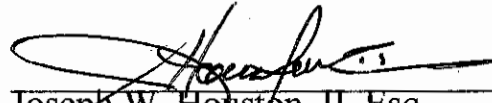
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6 In Bryan v. Nevada Commission on Judicial Discipline 104 Nev. 644,
7 764 P.2d 1296, 1302, (1998) the Nevada Supreme Court stated:

8 “Finally, we observe that neither the directives of NRS 1.225 (the statute
9 for disqualification of Supreme Court judges and judges of the Court of Appeals
10 which is exactly similar to the grounds for disqualification), nor the provisions
11 of the Nevada Code of Judicial Conduct, should be read to permit a litigant,
12 through legally insufficient and unfounded allegations of bias, to manipulate the
13 processes of an appellant court (here the District Court) or to nullify the court’s
14 obligation under the constitution to review the types of determinations
15 challenged in these appeals.”

16 Dated this 31 day of January, 2018.

17 
18 Joseph W. Houston, II, Esq.
19 State Bar #1440
20 430 South 7th Street
21 Las Vegas, Nevada 89101
22 (702) 982-1200
23 Attorney for Defendants
24 LOUIS C. SCHNEIDER, individually
25 and LAW OFFICE OF LOUIS C.
26 SCHNEIDER, LLC
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28 ...

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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Joseph W. Houston, II, Esq. and that on the 31st day of January, 2018 I served a true and correct copy of the above and forgoing Opposition to Motion to Disqualify on the parties addressed as shown below:

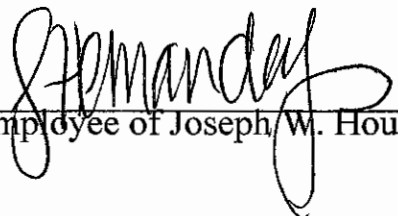
Dennis L. Kennedy, Esq. (Nevada Bar No. 1462)
Joshua P. Gilmore, Esq. (Nevada Bar No. 11576)
BAILEY KENNEDY
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Jennifer V. Abrams, Esq. (Nevada Bar No. 7575)
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Margaret A. Mcletchie, Esq. (Nevada Bar No. 10931)
MCLETCHIE SHELL LLC
701 East Bridger Ave., Suite 520
Las Vegas, Nevada 89101

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


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

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EXHIBIT A

REGISTER OF ACTIONS**CASE No. A-17-749318-C****Jennifer Abrams, Plaintiff(s) vs. Louis Schneider, Defendant(s)**§
§
§
§
§
§
§Case Type: **Intentional Misconduct**Date Filed: **01/09/2017**Location: **Department 12**Cross-Reference Case Number: **A749318**Supreme Court No.: **73838****PARTY INFORMATION****Lead Attorneys****Defendant Law Offices of Louis C Schneider LLC****Joseph W. Houston, II***Retained*

702-982-1200(W)

Defendant Sanson, Steve W**Margaret A. McLetchie***Retained*

702-728-5300(W)

Defendant Schneider, Louis C**Joseph W. Houston, II***Retained*

702-982-1200(W)

Defendant Veterans In Politics International Inc.**Margaret A. McLetchie***Retained*

702-728-5300(W)

Plaintiff Abrams & Mayou Law Firm**Jennifer V. Abrams***Retained*

702-222-4021(W)

Plaintiff Abrams, Jennifer V**Jennifer V. Abrams***Retained*

702-222-4021(W)

EVENTS & ORDERS OF THE COURT06/22/2017 **Minute Order** (3:00 AM) (Judicial Officer Leavitt, Michelle)**Minutes**

06/22/2017 3:00 AM

- 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

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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

[Return to Register of Actions](#)