

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

STEVE SANSON, AN INDIVIDUAL;  
AND ROB LAUER,  
AN INDIVIDUAL,

Appellants,

v.

LAWRA KASSEE BULEN,

Respondent.

Electronically Filed  
May 28 2021 12:54 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

SUPREME COURT CASE NO. 82393

Dist. Court Case No. A-18-784807-C

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**APPENDIX TO APPEAL FROM THE  
EIGHTH JUDICIAL DISTRICT COURT**

**VOLUME II**

---

**ADAM J. BREEDEN, ESQ.**

Nevada Bar No. 008768

**BREEDEN & ASSOCIATES, PLLC**

376 E. Warm Springs Road, Suite 120

Las Vegas, Nevada 89119

Telephone: (702) 819-7770; Facsimile: (702) 819-7771

Adam@breedenandassociates.com

*Attorney for Appellants*

<b>DESCRIPTION OF DOCUMENT</b>	<b>DATE</b>	<b>VOL.</b>	<b>PAGE(S)</b>
Complaint	11/20/2018	I	ROA000001 – ROA000077
Affidavit of Service on Rob Lauer	02/26/2019	II	ROA000078
Affidavit of Service on Rob Lauer (duplicate filed)	02/26/2019	II	ROA000079
Affidavit of Service on Steve Sanson	02/26/2019	II	ROA000080
Affidavit of Service on Steve Sanson (duplicate filed)	02/26/2019	II	ROA000081
Order to Show Cause re: Dismissal	02/13/2020	II	ROA000082 – ROA000083
Defendants' Notice of Motion and Motion to Dismiss Plaintiff's Complaint; Memorandum of Points and Authorities in Support, Exhibits, Affidavit of Robert Lauer in Support	04/03/2020	II	ROA000084 – ROA000091
Plaintiff's Opposition to Defendants' Untimely Motion to Dismiss Complaint and Countermotion for Attorneys' Fees and Costs	04/20/2020	III	ROA000092 – ROA000178
Recorder's Transcript of Hearing: All Pending Motions	05/12/2020	IV	ROA000179 – ROA000186
Recorder's Transcript of Video Conference Hearing: All Pending Motions	06/23/2020	IV	ROA000187 – ROA000198
Defendants' Special Motion to Dismiss Complaint Pursuant to NRS 41.660	07/02/2020	IV	ROA000199 - ROA000242
Notice of Entry of Order Granting Defendants' Motion to Set Aside Defaults and Denying Plaintiff's Countermotion for Application for Default Judgment	07/09/2020	IV	ROA000243 – ROA000249
Notice of Non-Opposition to Defendants' Special Motion to Dismiss Complaint Pursuant to NRS 41.660	07/21/2020	IV	ROA000250 – ROA000251
Plaintiff Bulen's Opposition to Defendants' Anti-SLAPP Special Motion to Dismiss Under NRS 41.660	07/21/2020	IV	ROA000252 – ROA000345

<b>DESCRIPTION OF DOCUMENT</b>	<b>DATE</b>	<b>VOL.</b>	<b>PAGE(S)</b>
Defendants' Reply in Support of Special Motion to Dismiss Complaint Pursuant to NRS 41.660	07/28/2020	V	ROA000346 – ROA000349
Recorder's Transcript of Video Conference Hearing: Defendants' Special Motion to Dismiss Pursuant to NRS 41.660	08/04/2020	V	ROA000350 – ROA000368
Order Granting Defendants' Special Motion to Dismiss Complaint Pursuant to NRS 41.660	08/21/2020	V	ROA000369 – ROA000377
Notice of Entry of Order	08/25/2020	V	ROA000378 – ROA000388
Defendants' Motion for Attorney's Fees, Costs, and Additional Relief Pursuant to NRS 41.660 and NRS 41.670	09/01/2020	V	ROA000389 – ROA000410
Plaintiff Bulen's Opposition to Defendants' Motion for Attorney's Fees, Costs, and Additional Relief Pursuant to NRS 41.660 and NRS 41.670	09/15/2020	V	ROA000411 – ROA000420
Notice of Appeal	09/24/2020	V	ROA000421 – ROA000434
Recorder's Transcript of Video Conference Hearing: Defendants' Motion for Attorneys Fees and Costs and Additional Relief Pursuant to NRS 41.660 and NRS 41.670	10/06/2020	V	ROA000435 – ROA000446
Order on Defendants' Motion for Attorneys' Fees	12/18/2020	V	ROA000447 – ROA000452
Notice of Entry of Order	12/21/2020	V	ROA000453 – ROA000461
Case Appeal Statement	01/20/2021	V	ROA000462 – ROA000465
Notice of Appeal	01/20/2021	V	ROA000466 – ROA000467

## **CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Breeden & Associates, PLLC, and on the 28<sup>th</sup> day of May, 2021, a true and correct copy of the foregoing document was e-filed and e-served on all registered parties to the Supreme Court's electronic filing system.

Additionally, a hard copy of the Appendix with all documents on CD-ROM was served on Respondent by placing a copy in the US Mail, postage pre-paid, on the same date to:

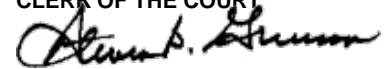
Brandon L. Phillips, Esq.  
BRANDON L. PHILLIPS ATTORNEY AT LAW PLLC  
1455 E. Tropicana Avenue, Suite 750  
Las Vegas, Nevada 89119  
*Attorneys for Respondent*

/s/ Kristy L. Johnson  
Attorney or Employee of  
Breeden & Associates, PLLC

AOS

**DISTRICT COURT , CLARK COUNTY  
CLARK COUNTY, NEVADA**

Electronically Filed  
2/26/2019 11:09 AM  
Steven D. Grierson  
CLERK OF THE COURT



**LAWRA KASSEE BULEN**

Plaintiff

**VS**

**ROB LAUER; STEVE SANSON; ET AL**

Defendant

CASE NO: A-18-784807-C

HEARING DATE/TIME:

DEPT NO: IX

**AFFIDAVIT OF SERVICE**

DOUGLAS DEMOTTA being duly sworn says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceedings in which this affidavit is made. That affiant received 1 copy(ies) of the SUMMONS, COMPLAINT, on the 4th day of January, 2019 and served the same on the 5th day of January, 2019, at 08:49 by:

delivering and leaving a copy with the servee ROB LAUER at (address) 3888 QUADREL ST., LAS VEGAS NV 89129

**Pursuant to NRS 53.045**

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

**EXECUTED this 05 day of Jan, 2019.**



**DOUGLAS DEMOTTA  
R-045600**

Junes Legal Service, Inc. - 630 South 10th Street - Suite B - Las Vegas NV 89101 - 702.579.6300 - fax 702.259.6249 - Process License #1068

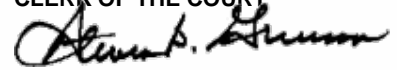
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**DISTRICT COURT , CLARK COUNTY  
CLARK COUNTY, NEVADA**

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2/26/2019 9:53 AM  
Steven D. Grierson  
CLERK OF THE COURT



**LAWRA KASSEE BULEN**

**Plaintiff**

**CASE NO: A-18-784807-C**

**VS**

**HEARING DATE/TIME:**

**ROB LAUER; STEVE SANSON; ET AL**

**Defendant**

**DEPT NO:**

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**DOUGLAS DEMOTTA  
R-045600**

Junes Legal Service, Inc. - 630 South 10th Street - Suite B - Las Vegas NV 89101 - 702.579.6300 - fax 702.259.6249 - Process License #1068

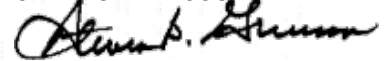
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**DISTRICT COURT , CLARK COUNTY  
CLARK COUNTY, NEVADA**

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2/26/2019 11:09 AM  
Steven D. Grierson  
CLERK OF THE COURT



**LAWRA KASSEE BULEN**

**Plaintiff**

**VS**

**ROB LAUER; STEVE SANSON; ET AL**

**Defendant**

**CASE NO: A-18-784807-C**

**HEARING DATE/TIME:**

**DEPT NO: IX**

**AFFIDAVIT OF SERVICE**

REBECCA D. GODWIN being duly sworn says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceedings in which this affidavit is made. That affiant received 1 copy(ies) of the SUMMONS, COMPLAINT, on the 4th day of January, 2019 and served the same on the 8th day of January, 2019, at 15:51 by:

delivering and leaving a copy with the servee STEVE SANSON at (address) 8908 BIG BEAR PINES AVE., LAS VEGAS NV 89143

AFRICAN AMERICAN MALE WITH BLACK BEANIE AND HIS LITTLE GIRL. GETTING INTO WHITE DODGE.

**Pursuant to NRS 53.045**

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



**EXECUTED this 08 day of Jan, 2019.**

**REBECCA D. GODWIN  
R-060010**

Junes Legal Service, Inc. - 630 South 10th Street - Suite B - Las Vegas NV 89101 - 702.579.6300 - fax 702.259.6249 - Process License #1068

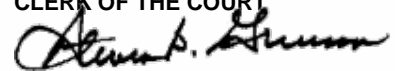
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**DISTRICT COURT , CLARK COUNTY  
CLARK COUNTY, NEVADA**

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Steven D. Grierson  
CLERK OF THE COURT



**LAWRA KASSEE BULEN**

**Plaintiff**

**vs**

**ROB LAUER; STEVE SANSON; ET AL**

**Defendant**

**CASE NO: A-18-784807-C**

**HEARING DATE/TIME:**

**DEPT NO:**

**AFFIDAVIT OF SERVICE**

REBECCA D. GODWIN being duly sworn says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceedings in which this affidavit is made. That affiant received 1 copy(ies) of the SUMMONS, COMPLAINT, on the 4th day of January, 2019 and served the same on the 8th day of January, 2019, at 15:51 by:

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AFRICAN AMERICAN MALE WITH BLACK BEANIE AND HIS LITTLE GIRL. GETTING INTO WHITE DODGE.

**Pursuant to NRS 53.045**

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



**EXECUTED this 08 day of Jan, 2019.**

**REBECCA D. GODWIN  
R-060010**

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*Steven D. Grierson*

OSCD

DISTRICT COURT  
CLARK COUNTY, NEVADA

\*\*\*\*

Lawra Bulen, Plaintiff(s)  
vs.  
Rob Lauer, Defendant(s)

CASE NO: A-18-784807-C  
Department 8  
HEARING DATE: March 24, 2020  
HEARING TIME: 9:00 AM

ORDER TO SHOW CAUSE RE: DISMISSAL

IT IS HEREBY ORDERED that the parties are directed to appear before the Court to show cause, if any they have, why the above-entitled matter should not be dismissed by the Court as prescribed by Nevada statutes and local court rules indicated by an X below:



Failure to take action for more than 6 months on a case that has been pending for more than 12 months. EDCR 2.90 Cases dismissed under this rule may be reactivated within 30 days upon written request of a party or party's attorney.

IT IS FURTHER ORDERED that the hearing regarding dismissal of this case has been scheduled to take place on **March 24, 2020**, at the hour of 9:00 AM, in Department 8. In the event that counsel or self-represented litigants fail to appear, the Court will dismiss this action without prejudice.

DATED: This 6th day of February, 2020

*Trevor Atkin*

TREVOR ATKIN  
DISTRICT COURT JUDGE

RECEIVED

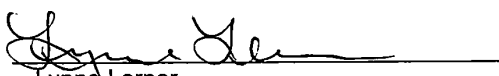
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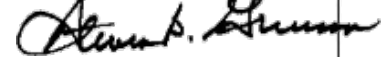
CLERK OF THE COURT

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**CERTIFICATE OF SERVICE**

I hereby certify that on the date e-filed, a copy of the foregoing was electronically served, pursuant to N.E.F.C.R. Rule 9, to all registered parties in the Eighth Judicial District Court Electronic Filing Program.

  
Lynne Lerner  
Judicial Executive Assistant



1 Motion to Dismiss

2 Robert Lauer,  
3 870 Sierra Vista Dr.  
4 #4  
5 Las Vegas, NV 89169  
6 Tel: (702) 271-4436

7 ROBERT LAUER, IN PRO PER  
8 STEVE SANSON

9  
10  
11 **IN THE DISTRICT COURT OF LASVEGAS TOWNSHIP**  
12 **CLARK COUNTY, STATE OF NEVADA**

13 LAWRA KASSEE BULEN, an individual  
14 Plaintiff,

15 vs.

16 ROBERT LAUER, STEVE SANSON; Does I-V,  
17 inclusive;  
18 Defendants.

Case No. A-18-784807-C

Department: 8

**DEFENDANTS' NOTICE OF MOTION  
AND MOTION TO DISMISS PLAINTIFF'S  
COMPLAINT  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT,  
EXHIBITS, AFFIDAVIT OF ROBERT  
LAUER IN SUPPORT**

**DATE:  
TIME:  
DEPT. NO.8**

19  
20  
21 **TO THE COURT, ALL INTERESTED PARTIES HEREIN, AND THEIR ATTORNEYS OF RECORD:**

22 **PLEASE TAKE NOTICE THAT** a hearing will be held on May 12, 2020 at 9:00a.m., or as soon  
23 thereafter as the matter can be heard, in Department 8 IN THE DISTRICT COURT OF LASVEGAS  
24 TOWNSHIP CLARK COUNTY, STATE OF NEVADA, located at 200 Lewis Avenue Las Vegas NV  
25 89155, DEFENDANT ROBERT LAUER (hereinafter the "**Lauer**") and STEVE SANSON (hereinafter  
26 Sanson) specially appears to make the Motion herein to Dismiss the Complaint (hereinafter  
27  
28

1 "COMPLAINT") filed by PLAINTIFF LAWRA KASSEE BULEN (hereinafter "KASSEE"). Lauer is  
2 specially appearing on his own behalf, *in pro per* will and hereby does move **TO DISMISS THE**  
3 **COMPLAINT** for the following: **COMPLAINT AGAINST LAUER as a matter of law must fail.**

4 Lauer moves the Court to Dismiss pursuant to RULES OF CIVIL PROCEDURE Rule  
5 12(b)(5) to Dismiss KASSEE's Complaint.

6  
7 This motion is based upon this notice, the accompanying memorandum of points and authorities,  
8 the pleadings and papers on file in the above-captioned action, and other evidence that may be presented  
9 by Moving Defendants prior to or at the hearing on this motion to dismiss.

10  
11 Dated: 4-2-2020

  
By: ROBERT LAUER *PRO PER*

12  
13 Dated: 4/2/20

  
By: STEVE SANSON *PRO PER*

## MEMORANDUM OF POINTS AND AUTHORITIES

The definitions set forth *ante* in the Notice of Motion and Motion are incorporated herein to avoid repetition. The Court should GRANT the motion for the following reasons.

### 1. Introduction

This action arises based on Kassee's claims that Lauer and Sanson published several articles that defamed her. IN addition, Kassee claims Lauer defame her and produce a false light when he edited an on camera interview Kassee knowingly participated in. Lauer is a news reporter. Sanson is a political activist.

### 2. BACK GROUND

KASSEE AND LAUER dated from March 2018 through June 2018.

KASSEE filed a frivolous police report claiming Lauer was attending a speech with President Trump because she was there.

KASSEE then filed a frivolous TPO against Lauer on July 11, 2018 which Justice Court also dismissed with prejudice. In fact, following that frivolous July 2018 TPO, Lauer offered and Bulen agreed to sign a non-contact and non-disparagement agreement with Lauer which Lauer's lawyer drafted. But KASSEE, acting in bad faith, never signed the agreement, even after Lauer's lawyer drafted several revisions her lawyer requested at a cost of \$4,000.

KASSEE has filed numerous police reports against Lauer, all of which were listed as frivolous.

KASSE then filed this frivolous defamation lawsuit against Lauer and Sanson in 2018.

KASSEE's first lawyer withdrew in January 2019.

KASSEE filed another TPO in January 2019 which Justice Court dismissed after a hearing.

The fact is, KASSEE has been under the care of a psychiatrist and suffers from drug and alcohol addictions. She was forced to quit the Jimmy Vega Campaign after being drunk and nowhere to be found the entire day before the election on June 11, 2018. Lauer has personally witnessed KASSEE popping pills and calling Lauer at all hours of the night drunk slurring her words.

1 KASSEE was arrest in 2019 for DUI/ drug possession and pled guilty. KASSEE lacks the mental  
2 capacity to be allowed to proceed in this case.  
3

### 4 3. Legal Argument

#### 5 A. Standard for Motion to Dismiss.failure to state a claim.

6 Pursuant to Rule 12(b)(5) of the Nevada Rules of Civil Procedure, courts may dismiss a  
7 complaint or a portion of a complaint for failure to state a claim upon which relief may be  
8 granted. See Nev. R. Civ. P. 12(b)(5). When entertaining a motion to dismiss pursuant to Rule  
9 12(b)(5), this Court's "task is to determine whether or not the challenged pleading sets forth  
10 allegations sufficient to make out the elements of a right to relief." Edgar v. Wagner, 101 Nev.  
11 226, 227, 699 P.2d 110, 111 (1985). In making this determination, the allegations in the  
12 complaint "must be taken at 'face value' and must be construed favorably in the plaintiffs  
13 behalf." Id. at 227-28, 111-12 (citation omitted). Additionally, where a complaint is vague  
14 and ambiguous, so that the responding party cannot reasonably be required to frame a  
15 responsive pleading, the plaintiff may be compelled to provide a more definite statement of his  
16 alleged claims for relief. See Nev. R. Civ. P. 12(e).  
17

18 "Although Nevada is a notice pleading jurisdiction, a party must be given reasonable  
19 advance notice of an issue to be raised and an opportunity to respond." Anastassatos v.  
20 Anastassatos, 112 Nev. 317, 320, 913 P.2d 652, 653 (1996). "The test for determining whether  
21 the allegations of a cause of action are sufficient to assert a claim for relief is whether the  
22 allegations give fair notice of the nature and basis of the claim and the relief requested."  
23 Ravera V. City of Reno, 100 Nev. 68,70, 675 P.2d 407, 408 (1984). Notably, the United States  
24 Supreme Court recently heightened the sufficiency of pleading requirement. Namely, in Bell  
25 Atlantic Corp. v. Twombly, 550 U.S. 544, 127 S. Ct. 1955, 1964-65 (2007), the Supreme Court  
26  
27  
28

1 held that notice pleading requires more than mere legal conclusions to defeat a motion to  
2 dismiss.

3 In Twombly, the Supreme Court specifically stated that a plaintiff is obligated "to  
4 provide the 'grounds' of his 'entitle[ment] to relief' beyond mere 'labels and conclusions.'" Id.  
5 The Supreme Court also stated that "a formulaic recitation of the elements of a cause of action  
6 will not do." Id. As a result, a plaintiff must provide "[factual allegations . . . to raise a right to  
7 relief above the speculative level . . . on the assumption that all the allegations in the complaint  
8 are true (even if doubtful in fact)." Id. In *Ashcroft v. Iqbal*, 556 U.S. , 129 S.Ct. 1937,  
9 1951 (2009), the United States Supreme Court further reaffirmed Twombly and clarified that it  
10 applies to all civil actions and proceedings in the United States district courts. Kasee's complaint  
11 fails to support a claim upon which relief can be granted against LAUER and SANSON. Therefore, this  
12 Court should dismiss KASSEE'S Complaint with prejudice.  
13  
14

15 **b. KASSEE's Intentional Infliction of Emotional Distress Claim Fails As a Matter of Law.**

16 KASSEE's claims for relief alleges she has suffered injuries to her reputation and image  
17 in the community, resulting in loss of employment, emotional distress". KASSEE's claim for  
18 Intentional infliction of emotional distress ("IIED"), is however, merely a formulaic recitation of  
19 elements of an claim and ,therefore, fails to meet the requisite pleading standard. Indeed, KASSEE does  
20 not allege the "extreme " conduct Lauer purportedly committed, which could have caused KASSEE's  
21 emotional distress.  
22

23 To establish a cause of action for intentional infliction of emotional distress("IIED"), KASSEE  
24 must plead the following: (1) extreme and outrageous conduct with either the intention of, or reckless  
25 disregard for, causing emotional distress; (2) KASSEE's severe or extreme emotional distress; and  
26 actual or proximate causation. *Barnetiler v. Reno Air, Inc.*, 114 Nev. 441, 447, 956 P.2d 1382, 1386  
27 (1998). Actions for intentional infliction of emotional distress require proof of physical impact or injury.  
28

1 *See Barmettier*, 14 Nev. at 448, 956 P.2d at 1387 ("we therefore hold that, in cases where emotional  
2 distress damages are not secondary to physical injuries, but rather, precipitate physical symptoms, either  
3 a physical impact must have occurred or, in the absence of physical impact, proof of 'serious emotional  
4 distress' causing physical injury or illness must be presented."); *see also Chowdhry v. NLVH, Inc.*, 109  
5 Nev. 478, 482-83, 851 P.2d 459, 462 (1993) (plaintiff's claims that he was very upset and could not sleep  
6 were insufficient to satisfy the physical impact requirement). Where a plaintiff cannot allege facts  
7 sufficient to support the foregoing elements, the plaintiff's claim fails as a matter of law. *See Chowdhry*,  
8 109 Nev. at 482-83, 851 P.2d at 462 (district court properly granted directed verdicts on plaintiff's  
9 claims for intentional and negligent infliction of emotional distress where plaintiff presented insufficient  
10 evidence of serious emotional distress or physical injury or illness; and failed to show the existence of  
11 extreme or outrageous conduct or intent to cause severe emotional distress).

12 KASSEE's emotional distress claim is deficient because she has failed establish that KASSEE  
13 suffered the requisite physical impact *as a result of Lauer's claimed conduct*. To begin, conduct, to  
14 be outrageous, must be so extreme as to exceed all bounds of that usually tolerated in a civilized  
15 society." *See Schneider v. TRY hc*, 938 F.2d 986, 992-93 (9th Cir. 1991) (internal citations omitted),  
16 "Severe emotional distress means . . . emotional distress of such substantial quantity or enduring quality  
17 that no reasonable man in a civilized society should be expected to endure it." *Id.* (quoting *Fletcher v.*  
18 *Western Nat'l Life Ins. Co.*, 89 Cal.Rptr. 78, 90 (Cal.Ct.App. 1970). "Liability for emotional distress  
19 will not extend to 'mere insults, indignities, threats, annoyances, petty oppressions, or other trivialities."  
20 *Candelore v. Clark County Sanitation Dist.*, 975 F.2d 588, 591 (9th Cir. 1992) (citing *Restatement*  
21 *(Second)* of Torts § 46 (1965)).

## 22 CONCLUSION

23 Based on the above stated facts and arguments, LAUER & SANSON respectfully request that



1  
2 the Court Dismiss, with prejudice, KASSEE's claims for relief asserted against Lauer.

3  
4 DATED: 4-2-2020  
ROBERT LAUER

5 By [Signature]  
6 IN Pro Per

7  
8 DATED: 4/2/20

9 STEVE SANSONS

10 By [Signature]  
11 In Pro Per

1 **AFFIDAVIT OF ROBERT LAUER IN SUPPORT OF DEFEENDANT'S MOTION TO**  
2 **DISMISS PLAINTIFF'S COMPLAINT MEMORANDUM OF POINTS AND**  
3 **AUTHORITIES IN SUPPORT, EXHIBIT**

3 STATE OF NEVADA     }  
4 COUNTY OF CLARK    } ss:

5 I, ROBOT LAUER, being duly sworn, deposes, and says;

- 6  
7 1. I am the DEFENDANT in an action against PLAINTIFF KASSEE, and I make this Affidavit  
8 in support of my MOTION TO DISMISS PLAINTIFF'S COMPLAINT and  
9 MEMORANDUM OF POINTS AND AUTHORITIES  
10 2. I have personal knowledge of all matters set forth herein, except for those matters stated upon  
11 information and belief, and I am competent to testify thereon.  
12 3. I make this Affidavit in good faith and not for purposes of delay.

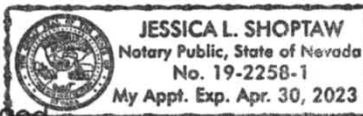
12 FURTHER YOUR AFFIANT SAYETH NAUGHT

13  
14  
15   
16 ROBERT LAUER

16 SUBSRCIBED AND SWORN to before me on  
17 this 2 Day of APRIL 2020

18 NOTARY PUBLIC in and for said County and State

20 STATE OF NEVADA  
21 COUNTY OF CLARK



This instrument acknowledged  
before me on April 30, 2023  
by [Signature]