

# IN THE SUPREME COURT OF THE STATE OF NEVADA

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Elizabeth A. Brown  
Clerk of Supreme Court

LISA BRESLAW,  
Appellant(s),

vs.

PETER COOPER,  
Respondent(s),

Case No: A-21-837948-C

Docket No: 84072

# RECORD ON APPEAL VOLUME 1

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**I N D E X**

<b><u>VOLUME:</u></b>	<b><u>PAGE NUMBER:</u></b>
1	1 - 240
2	241 - 480
3	481 - 491



**I N D E X**

<b><u>VOL</u></b>	<b><u>DATE</u></b>	<b><u>PLEADING</u></b>	<b><u>PAGE NUMBER:</u></b>
1	07/29/2021	AFFIDAVIT OF DUE DILIGENCE	72 - 75
1	08/24/2021	AFFIDAVIT OF DUE DILIGENCE	82 - 85
1	10/27/2021	AFFIDAVIT OF SERVICE	107 - 107
2	01/10/2022	CASE APPEAL STATEMENT	441 - 442
3	02/02/2022	CERTIFICATION OF COPY AND TRANSMITTAL OF RECORD	
1	11/29/2021	CLERK'S NOTICE OF CURATIVE ACTION	165 - 166
2	12/14/2021	CLERK'S NOTICE OF CURATIVE ACTION	315 - 316
2	01/03/2022	CLERK'S NOTICE OF CURATIVE ACTION	414 - 415
1	07/16/2021	CLERK'S NOTICE OF NONCONFORMING DOCUMENT	65 - 67
1	11/16/2021	CLERK'S NOTICE OF NONCONFORMING DOCUMENT	159 - 161
1	11/16/2021	CLERK'S NOTICE OF NONCONFORMING DOCUMENT	162 - 164
2	12/10/2021	CLERK'S NOTICE OF NONCONFORMING DOCUMENT	310 - 312
2	12/28/2021	CLERK'S NOTICE OF NONCONFORMING DOCUMENT	395 - 397
2	12/28/2021	CLERK'S NOTICE OF NONCONFORMING DOCUMENT	398 - 400
1	07/15/2021	COMPLAINT	1 - 7
1	11/02/2021	DEFENDANT'S MOTION TO DISMISS	108 - 120
3	02/02/2022	DISTRICT COURT MINUTES	489 - 491
2	12/29/2021	ERRATA FOR AMENDED COMPLAINT	403 - 404
2	12/15/2021	ERRATA FOR MOTION FOR LEAVE TO FILE A SUR-REPLY TO DEFENDANT'S MOTION TO DISMISS AND THE ATTACHED SUR-REPLY	318 - 318
1	11/04/2021	ERRATA FOR OPPOSITION MOTION	142 - 143
1	11/06/2021	ERRATA FOR OPPOSITION MOTION (UPDATED)	157 - 158

**I N D E X**

<b><u>VOL</u></b>	<b><u>DATE</u></b>	<b><u>PLEADING</u></b>	<b><u>PAGE NUMBER:</u></b>
2	12/24/2021	ERRATA FOR REPLY RE: DEFENDANT'S OPPOSITION TO MOTION FOR LEAVE TO FILE SUR-REPLY TO DEFENDANT'S MOTION TO DISMISS AND OPPOSITION TO EX PARTE MOTION FOR CONTINUANCE	345 - 345
2	12/28/2021	ERRATA TO AMENDED COMPLAINT	401 - 402
2	12/16/2021	EX PARTE MOTION FOR CONTINUANCE (HEARING REQUESTED ON SHORTENED TIME)	319 - 321
1	11/05/2021	EXHIBIT 17	144 - 144
1	07/15/2021	EXHIBIT 1	8 - 8
1	07/15/2021	EXHIBIT 10	57 - 58
1	07/15/2021	EXHIBIT 11	59 - 60
1	07/15/2021	EXHIBIT 12	61 - 62
1	08/30/2021	EXHIBIT 13	87 - 90
1	08/30/2021	EXHIBIT 14	91 - 91
1	11/05/2021	EXHIBIT 17	145 - 145
1	11/05/2021	EXHIBIT 18	146 - 155
1	07/15/2021	EXHIBIT 2	9 - 9
1	11/05/2021	EXHIBIT 20	156 - 156
1	12/08/2021	EXHIBIT 21	197 - 198
1	12/08/2021	EXHIBIT 22	199 - 204
1	12/08/2021	EXHIBIT 23	205 - 207
1	12/09/2021	EXHIBIT 24	208 - 209
1	12/09/2021	EXHIBIT 25	210 - 212
1	12/09/2021	EXHIBIT 26 (CONTINUED)	213 - 240

**I N D E X**

<b><u>VOL</u></b>	<b><u>DATE</u></b>	<b><u>PLEADING</u></b>	<b><u>PAGE NUMBER:</u></b>
2	12/09/2021	EXHIBIT 26 (CONTINUATION)	241 - 290
2	12/09/2021	EXHIBIT 27	291 - 291
2	12/09/2021	EXHIBIT 28	292 - 293
2	12/09/2021	EXHIBIT 29	294 - 295
1	07/15/2021	EXHIBIT 3	10 - 35
2	12/09/2021	EXHIBIT 30	296 - 297
2	12/09/2021	EXHIBIT 31	298 - 300
2	12/09/2021	EXHIBIT 32	301 - 304
2	12/09/2021	EXHIBIT 33 (REFILED)	307 - 309
2	12/09/2021	EXHIBIT 34	305 - 305
2	12/09/2021	EXHIBIT 35	306 - 306
2	12/10/2021	EXHIBIT 36	314 - 314
2	12/21/2021	EXHIBIT 37	324 - 324
2	12/21/2021	EXHIBIT 37 (INDEX SHEET) REDDIT'S RESPONSE	323 - 323
2	12/28/2021	EXHIBIT 38 (ADDITION)	393 - 393
1	07/15/2021	EXHIBIT 4	36 - 36
1	07/15/2021	EXHIBIT 5	37 - 37
1	07/15/2021	EXHIBIT 6	38 - 41
1	07/15/2021	EXHIBIT 7	42 - 42
1	07/15/2021	EXHIBIT 8	43 - 54
1	07/15/2021	EXHIBIT 9	55 - 56
2	12/28/2021	EXHIBIT INDEX EXHIBITS 38-39 (MERGED)	371 - 371

**I N D E X**

<b><u>VOL</u></b>	<b><u>DATE</u></b>	<b><u>PLEADING</u></b>	<b><u>PAGE NUMBER:</u></b>
1	07/15/2021	EXHIBIT INDEX PAGE	63 - 64
1	11/03/2021	EXHIBIT INDEX PAGE TO OPPOSITION MOTION TO DISMISS	136 - 136
2	12/10/2021	EXHIBIT INDEX SHEET ADDITIONAL EXHIBIT TO SUR- REPLY RE: REPLY RE: DEFENDANT'S MOTION TO DISMISS	313 - 313
2	01/02/2022	EXHIBIT INDEX SHEET EXHIBITS 40-41	405 - 405
1	12/08/2021	EXHIBIT INDEX SHEET MOTION FOR LEAVE TO FILE SURREPLY/ATTACHED SURREPLY	195 - 196
2	12/28/2021	EXHIBITS 38-39 (MERGED)	372 - 392
2	01/02/2022	EXHIBITS 40-41	406 - 413
1	11/03/2021	FILING FEE REMITTANCE	122 - 123
2	12/27/2021	HEARING REQUESTED MOTION FOR LEAVE TO AMEND COMPLAINT	357 - 370
1	11/03/2021	LETTER DATED 2/5/2020	141 - 141
1	07/29/2021	MOTION FOR ALTERNATIVE SERVICE HEARING REQUESTED	76 - 80
1	12/08/2021	MOTION FOR LEAVE TO FILE SUR-REPLY TO DEFENDANT'S MOTION TO DISMISS	177 - 194
2	01/10/2022	MOTION TO VACATE ORDER OF DISMISSAL / MOTION TO STAY ORDER OF DISMISSAL	431 - 439
2	01/06/2022	NOTICE OF APPEAL	421 - 422
2	01/06/2022	NOTICE OF ENTRY OF ORDER	423 - 430
1	08/02/2021	NOTICE OF HEARING	81 - 81
1	11/03/2021	NOTICE OF HEARING	121 - 121
2	12/14/2021	NOTICE OF HEARING	317 - 317
2	12/17/2021	NOTICE OF HEARING	322 - 322

**I N D E X**

<b><u>VOL</u></b>	<b><u>DATE</u></b>	<b><u>PLEADING</u></b>	<b><u>PAGE NUMBER:</u></b>
2	12/28/2021	NOTICE OF HEARING	394 - 394
2	01/10/2022	NOTICE OF HEARING	440 - 440
1	11/03/2021	OPPOSITION TO DEFENDANT'S MOTION TO DISMISS	124 - 135
2	12/22/2021	OPPOSITION TO MOTION FOR LEAVE FILE SUR-REPLY TO DEFENDANT'S MOTION TO DISMISS AND OPPOSITION TO EX PARTE MOTION FOR CONTINUANCE	325 - 333
2	01/24/2022	OPPOSITION TO MOTION TO VACATE ORDER OF DISMISSAL/MOTION TO STAY ORDER OF DISMISSAL AND COUNTERMOTION FOR ATTORNEYS' FEES REQUIRED RESPOND TO PLAINTIFF'S FRIVOLOUS/ VEXATIOUS FILINGS AND FOR AN INJUNCTION PREVENTING PLAINTIFF FROM FILING FRIVOLOUS FILINGS	443 - 453
2	01/06/2022	ORDER	416 - 420
1	11/03/2021	PROFF OF SERVICE CIVIL SUBPOENA	139 - 140
1	11/03/2021	PROOF OF SERVICE CIVIL SUBPOENA	137 - 138
1	12/03/2021	REPLY RE DEFENDANT'S MOTION TO DISMISS	167 - 176
2	12/23/2021	REPLY RE: DEFENDANT'S OPPOSITION TO MOTION FOR LEAVE TO FILE SUR-REPLY TO DEFENDANT'S MOTION TO DISMISS AND OPPOSITION TO EX PARTE MOTION FOR CONTINUANCE	334 - 344
2	12/24/2021	REPLY RE: DEFENDANT'S OPPOSITION TO MOTION FOR LEAVE TO FILE SUR-REPLY TO DEFENDANT'S MOTION TO DISMISS AND OPPOSITION TO EX PARTE MOTION FOR CONTINUANCE	346 - 356
2	01/27/2022	REPLY RE: DEFENDANT'S OPPOSITION TO MOTION TO VACATE ORDER OF DISMISSAL/MOTION TO STAY AND OPPOSITION TO DEFENDANT'S COUNTERMOTION FOR ATTORNEY'S FEES REQUIRED TO RESPOND TO PLAINTIFF'S "FRIVOLOUS/VEXATIOUS FILINGS" AND FOR AN INJUNCTION PREVENTING PLAINTIFF FROM FILING "FRIVOLOUS FILINGS" 2ND LEAVE TO AMEND COMPLAINT	478 - 480

**I N D E X**

<b><u>VOL</u></b>	<b><u>DATE</u></b>	<b><u>PLEADING</u></b>	<b><u>PAGE NUMBER:</u></b>
		(CONTINUED)	
3	01/27/2022	REPLY RE: DEFENDANT'S OPPOSITION TO MOTION TO VACATE ORDER OF DISMISSAL/MOTION TO STAY AND OPPOSITION TO DEFENDANT'S COUNTERMOTION FOR ATTORNEY'S FEES REQUIRED TO RESPOND TO PLAINTIFF'S "FRIVOLOUS/VEXATIOUS FILINGS" AND FOR AN INJUNCTION PREVENTING PLAINTIFF FROM FILING "FRIVOLOUS FILINGS" 2ND LEAVE TO AMEND COMPLAINT (CONTINUATION)	481 - 488
1	08/30/2021	SCREEN SHOT OF WEB BROWSER	92 - 92
1	10/14/2021	SUBPOENA DUCES TECUM FOR BUSINESS RECORDS (NO APPEARANCE REQUIRED)	93 - 99
1	10/19/2021	SUBPOENA DUCES TECUM FOR BUSINESS RECORDS (NO APPEARANCE REQUIRED)	100 - 106
1	07/16/2021	SUMMONS (ELECTRONICALLY ISSUED)	68 - 71
2	01/26/2022	TRANSCRIPT OF HEARING HELD ON JANUARY 4, 2022	454 - 477
1	08/30/2021	UPDATED EXHIBIT INDEX PAGE (EXHIBITS TO EX-PARTE MOTION)	86 - 86



**COURT**

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Plaintiff, In Proper

CASE NO: A-21-837948-C  
Department 3

**EIGHTH JUDICIAL DISTRICT COURT  
CLARK COUNTY, NV**

Lisa Breslaw,

Plaintiff

CASE NO.  
DEPT. NO.

vs.

Peter Cooper

Defendant

**COMPLAINT**

Plaintiff, LISA BRESLAW, in proper person, complains against, Defendant, PETER COOPER, as follows:

**I. PARTIES**

1. Plaintiff, LISA BRESLAW, (hereinafter "Plaintiff") is an individual who is currently, and who was at all relevant times herein, a resident of the State of Nevada, County of Clark, City of Las Vegas.

2. Defendant, PETER COOPER, (hereinafter "Defendant"), is a US citizen who resided in Sheffield, UK and Reading, UK at the relevant time herein but now resides in the US. His/their state is unknown at this time. Defendant had extended contact with Plaintiff over Reddit, where the relevant torts occurred. Plaintiff will be using a skip trace service to attempt to locate Defendant.

## **FACTS**

1. Plaintiff graduated from the University of Nevada Las Vegas on December 15, 2018.
2. Defendant identified as male at the time he published his libelous content but now identifies as nonbinary. Plaintiff will therefore refer to them by their preferred pronouns: "they" or "them."
3. Plaintiff has generalized anxiety disorder, is afraid of flying, and has a phobia of germs. These phobias have worsened during the pandemic, and it would be a significant hardship for Plaintiff to travel out of state/country to sue the defendant.
4. Around February or March of 2019, Plaintiff submitted a proposal to the Oral History Association for presentation at their 2019 annual conference.
5. On April 5, 2019, Plaintiff's oral history proposal was accepted.
7. In late April, Plaintiff emailed her former history professor, Dr. Marcia Gallo, politely asking if she knew anyone who would be interested in participating as a narrator/interviewee in this oral history project. Plaintiff did not name Dr. Gallo in her proposal nor demand that she assist with this project. (See exhibit 1, Plaintiff believes UNLV has the original email.)
8. Dr. Gallo replied to this email, declining to assist with the project, and Plaintiff perceived the tone of this response as "curt."
9. Plaintiff believed herself to have a good rapport with Dr. Gallo prior to this email exchange. (See exhibit 2.)
10. On April 30th, Plaintiff emailed Dr. Gallo again, informing her that she will "likely" withdraw the proposal from the conference" but explained that she would still like to complete the project without presenting it. She did not demand Dr. Gallo's assistance, but said that "any assistance would be appreciated" and "wished Dr. Gallo the best" "regardless of her decision" to help with the project. (See exhibit 3.)
11. When Dr. Gallo did not respond the next day, Plaintiff emailed UNLV's Department Chair, Andrew Kirk, regarding Dr. Gallo's "tone" on a few occasions, the lack of response to the previous email, and expressed feeling distressed over Dr. Gallo's seeming change in attitude toward Plaintiff. (UNLV has a record of the email.)



12. On May 16, 2019, Dr. Andrew Kirk emailed Plaintiff stating that he had met with the Dean and Associate Dean of the Liberal Arts College, Drs. Jennifer Keene and John Tuman respectively,"discussed the matter at length," reported the situation to Student Affairs, and told Plaintiff that her "grievances" were being formally recorded. (see exhibit 4)

14. Plaintiff later wished to retract these "grievances" and met with Dr. Keene sometime around June or July of 2019 in order to do so.

15. Dean Keene denied the meeting with Dr. Kirk and said there never was a grievance but refused to explain the discrepancy between her statement and Dr. Kirk's email. She also told Plaintiff that Dr. Gallo was not angry with her and that she may contact her (Dr. Gallo) for a letter of recommendation for graduate school.

16. In December of 2018, Dr. Gallo permitted Plaintiff to "contact her in the future re: grad school applications." (see exhibit 5)

17. After assurance from Dean Keene that Dr. Gallo was not upset with her and even seemed inclined to write her a letter of recommendation for grad school, Plaintiff emailed Dr. Gallo an apology letter around July 31, 2019, and included a request for a letter of recommendation. This act does not qualify as stalking or harassment under Nevada Law.

17. Dr. Gallo did not reply to this email, nor was she retired at this time.

18. Plaintiff continued contacting various levels of UNLV administration in order to retract the grievance that Dr. Kirk told her in writing existed. These correspondences include the Vice Provost, Christopher Heavey, then acting President, Marta Meana, and Assistant General Counsel, Debra Pieruschka.

17. The purpose of these correspondences was to retract the grievance, although she felt that Dr. Kirk was negligent for not discussing the situation in person with the Plaintiff before submitting an official complaint and/or lying about the grievance's existence. Plaintiff, to her knowledge, did not specifically request that Dean Keene be demoted. She did, however, feel that UNLV mishandled the matter, and was upset over her falling-out with Dr. Gallo.

19. Between October and December of 2019, Plaintiff was venting on Reddit about the situation, under the username u/Gemini725 . Plaintiff did not mention the involved parties by name.

20. Defendant had been following Plaintiff's Reddit account during this period and saving her posts.

21. On Dec. 16th, 2019, Defendant created a post on r/subredditdrama, a subreddit with nearly one million people, called *University student makes a dumb decision regarding her professor when applying to grad school, descends over the course of three months into an*

*obsessive stalker who's turned an entire faculty against her.*" This post alleges that Plaintiff "told her professor that they would collaborate on the project," tried to get the entire university administration, the faculty senate, and the Board of Regents involved in having both Dr. Kirk and Dean Keene demoted, and then stalked Dr. Gallo even after she had retired. Defendant also mocked Plaintiff's anxiety disorder and germ phobia in this post as well as mocked her in the comment section. (See exhibit 6)

22. Plaintiff is easily identifiable by the combination of facts presented in this post.

23. On around Dec. 16, Plaintiff was alerted to the subredditdrama post by another redditor.

24. Once alerted to the subredditdrama post, Plaintiff deleted her Reddit posts.

25. Defendant then retrieved them using removeddit links.

26. Defendant continued to harass Plaintiff across Reddit from both their main account and at least one other alt. account, u/DovahzulsABadConlang, (exhibit 7) which Defendant later revealed was them. Plaintiff suspects Defendant was behind other alt. accounts harassing her as well. Defendant taunted and provoked Plaintiff on her posts for several months (see exhibit 8), often condescendingly telling her to "stop" and responding "lol" when she accused him of bullying her or mentioned reporting their harassment to law enforcement. They also followed her on to another account where Plaintiff inquired about suing them and responded "Gemini, it's time to stop." (See exhibit 8.) She was additionally subjected to significant online harassment by numerous users because of the subredditdrama post.

27. The screenshots shown in exhibit 8 are not the entirety of Defendants harassment.

28. In April of 2019, Plaintiff learned Defendant's identity and reported them to the South Yorkshire police for harassment and malicious communications. Because Plaintiff resided in the US, they would not formally prosecute Defendant, but they warned them over Facebook to stop harassing her. (See exhibit 9.)

29. Defendant then created another Reddit account, u/LegAdUKThrowaway and asked that sub if it sounded like the police warning was real. They later provide an update stating that the South Yorkshire police confirmed that the warning was real. (See exhibit 10.)

30. Afterwards, Defendant added a flair to their subredditdrama post saying "Unironically had the police called on me because of an SRD post."

31. Defendant continued to mock Plaintiff, reference and share their SRD post, and brag about or laugh at having the police called on them. (See exhibit 8.)

32. Within a few months, Defendant created another account, u/Asticky\_, and continued this harassment. Defendant later deleted the content of this account. (exhibit 11)

33. In February of 2020, during a phone conversation with Plaintiff, UNLV's assistant general counsel, Debra Pieruschka, informs Plaintiff that she has "seen her social media activity."

34. Plaintiff was calling to respond to a cease and desist letter by UNLV to stop contacting admin. to retract the grievance. This cease and desist letter was not for directly contacting Dr. Gallo.

35. At no point was Plaintiff criminally charged with stalking or harassment, nor were any civil actions taken against her.

36. From the time the subredditdrama post was created on Dec. 16, 2019 until the present day, people on Reddit continue sharing it and asking for updates. (See exhibit 12)

37. Around February 1, 2021, Plaintiff applied to the University of Nevada Reno (UNR) for a Master's of Arts degree in history. Plaintiff had a 3.93 GPA from UNLV, 4.0 history GPA, and 2 graduate-level history courses. UNR's min. GPA requirement was 2.75 and they waived the GRE requirement during the pandemic. Plaintiff did not take the GRE exam.

38. On around March 16, 2021, Plaintiff was notified of her rejection from UNR.

39. Defendant has created the new account u/Nieuwe\_Sticky\_. Defendant had posted that around July 4th or 5th, they had moved to the US, but has deleted those comments. Defendant had been posting about moving to the US for several months.

41. Plaintiff chronically feels humiliated because of the subredditdrama post.

42. Plaintiff has become distrustful of people because of the harassment Defendant incited against her. For example, she always wonders whether anyone she meets or interacts with in real life could have been one of her online harassers.

43. Plaintiff feels she can never have a dignified professional image because of that SRD post.

44. Plaintiff has experienced physical symptoms such as chest tightness, tachycardia, and and general distress because of Defendant's harassment but could not afford medical treatment due to being uninsured at the time this harassment took place. Plaintiff will be discussing these symptoms and the harassment with her physician on her upcoming July 22nd appointment.

### **III. CLAIMS FOR RELIEF**

#### **A. LIBEL PER SE**

- 40. Defendant made false statements of fact against Plaintiff.
- 41. Defendant alleged that Plaintiff had committed the crime of stalking.
- 42. Defendant alleged that Plaintiff demanded collaboration with her professor and then frivolously attempted to have university administration demoted. These statements relate to the plaintiff's profession/education and make her less likely to be accepted into a graduate program.
- 43. Defendant made an unprivileged publication to multiple third parties.
- 44. Defendant acted intentionally.
- 45. As a result of these statements, Plaintiff's reputation was damaged.

#### **B. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

- 45. Defendant's conduct was extreme and outrageous.
- 46. Defendant intended to cause or acted with reckless disregard for causing Plaintiff emotional distress.
- 47. Defendant made his subredditdrama post and engaged in his subsequent harassment knowing that Plaintiff had anxiety issues.
- 48. As a proximate result of such conduct, the Plaintiff suffered severe emotional distress.

**WHEREFORE**, Plaintiff prays for the following relief:

- 1. An injunction for Defendant to remove the aforementioned subredditdrama post, incurring, if necessary, the full monetary cost of the removal. Defendant should also have to publicly retract his allegations and admit that he fabricated the parts about Plaintiff stalking her professor, trying to have the dean demoted, and telling her professor that "they will collaborate on the project."

2. An injunction for a restraining order against Defendant to prevent further harassment.
3. For special damages of \$19,200 for the lost opportunity to attend the University of Nevada Reno's MA history program. This amount is equivalent to the \$9,600 prorated annual graduate assistantship salary at the minimum of 10 hours a week. The program Plaintiff applied to takes an average of two years to complete, thus, at a minimum, she would have heard \$19,200 over those two years.
3. For general damages for past, present, and future pain and suffering, and other damages in excess of \$15,000.
4. For such other and further relief as this court deems just and equitable.

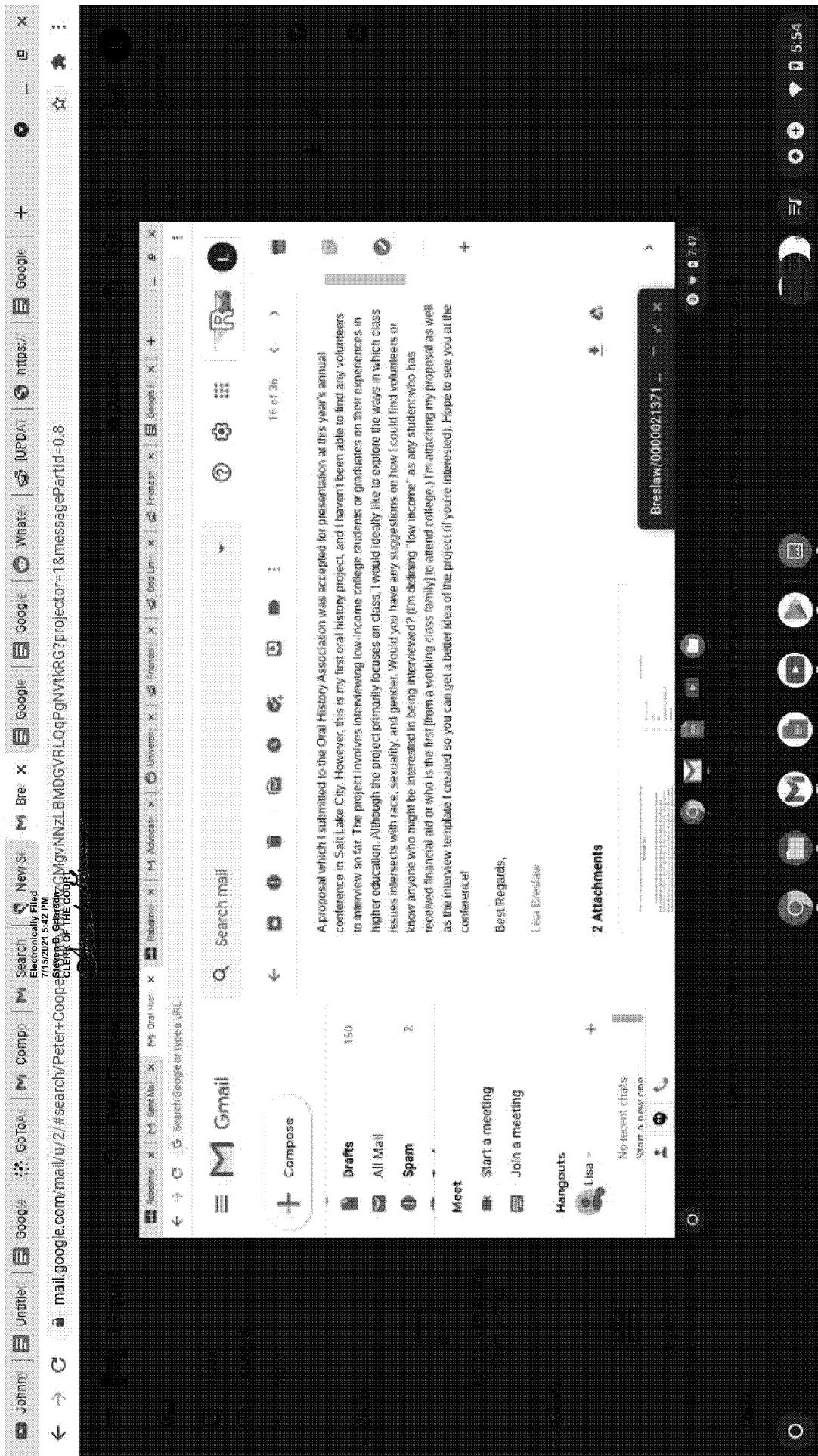
I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

DATED this 9th of July, 2021

Lisa Breslaw

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Lisa Breslaw  
7050 Shady Palms St.  
Las Vegas, NV 89031  
(702)488-6989\_\_\_\_\_





The screenshot shows a mobile browser interface. At the top, there is a search bar with the text "mail/google.com". Below the search bar, there is a list of search results. The first result is "mail/google.com" with a link to "mail/google.com". The second result is "mail/google.com" with a link to "mail/google.com". The third result is "mail/google.com" with a link to "mail/google.com". The fourth result is "mail/google.com" with a link to "mail/google.com". The fifth result is "mail/google.com" with a link to "mail/google.com". The sixth result is "mail/google.com" with a link to "mail/google.com". The seventh result is "mail/google.com" with a link to "mail/google.com". The eighth result is "mail/google.com" with a link to "mail/google.com". The ninth result is "mail/google.com" with a link to "mail/google.com". The tenth result is "mail/google.com" with a link to "mail/google.com".

Q Marcia Gallo



▼ Mail

 **Inbox**

 **Spam**

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69
 





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**Lisa Breslaw** <breslaw@unlv.neva...>
 Mon, Apr 29, 2019, 9:05 PM

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 to Marcia ▼

Hello Dr. Gallo,

My approach to this oral history project was admittedly impulsive and imprudent. I think I'm going to withdraw the proposal. I wanted to better demonstrate my research and project management abilities (while not under the intense stress I was under last semester). If I do withdraw the proposal, which I likely will, would you be able to offer some guidance with the project? I know there's only so much you could do long distance, but any assistance would be appreciated. Regardless of your decision, I wish you the very best.

Respectfully,

Lisa Breslaw





12

13

Belamy Brothers x Rebelmail x Advocate Application x Advocate Financial Info x University student make x W Advocate Financial Info x

reddit.com/r/SubredditDrama/comments/ebod10/university\_student\_makes\_a\_dumb\_decision/

reddit r/SubredditDrama Search

COMMUNITY OPTIONS

**Welcome!**

**NEW ANNOUNCEMENT:** Surplus drama is no longer required to be self posted, but it still needs to be quality or it will be removed.

Come join our Discord, [click here to join!](#)

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For drama happening inside SRD, check out [/r/subreddiddramadrama](#)

For meta discussion of this subreddit, go to [/r/metareddiddrama](#)

Please read the rules in our rules list before commenting or submitting. For more detail on the rules, [read our wiki](#)

**r/Subreddiddrama Rules**

1. No trolling, hate speech, or using slurs
2. No insults, flamewars, or flamewar
3. No /u/ summoning user from linked thread

OP is a mature student (F/late 30s) who just finished her undergrad with a 3.93 GPA and 6 graduate credits. Due to some housing insecurity in her last semester (during which she seems to have stayed at a faculty member's house for two days), she had to get a two-day extension on a research paper. The professor allowed it, but said she wasn't happy about it. She finishes the paper and gets an A-, and she takes that as a sign that the paper was awful. She keeps repeating some feedback she got on it ("a clear thesis" and "28/30 - a very good result") as a sign that the professor thinks it was awful and only gave her that mark out of pity.

She wants to approach the professor about grad school and a letter of recommendation, but she doesn't feel comfortable asking her after the horrible paper she had just written (the one that got an A-). So she just asks if she can contact her at a later time about grad school, to which the professor replies that she "could contact her in the future re: grad. school applications." She takes this as meaning that the professor doesn't want to write her a LoR because she isn't qualified enough yet (??), so she applies a proposal for a conference, gets accepted, and then tells her professor about it and that they would collaborate on it.

The professor obviously replied that she would not be able to help on this, as A) you can't just do that and expect them to go along with it, and B) as OP already knew at that point, the professor was retiring after that semester. She offers to withdraw from the conference, but her professor doesn't respond. OP perceives this as rude and cold, so she goes to the chair of the department with a complaint. She claims that she only wanted the chair to mediate the issue, not that there was an issue to mediate, but it was clearly a formal complaint, so the chair lets the dean know (both siding with the professor). OP takes this opportunity to talk directly to the dean and blame it all on her anxiety disorder, expecting that to resolve the situation.

She doesn't get the response she wants, so she feels that the chair was negligent, and gets the provost, Board of Regents, and faculty senate involved in an attempt to have the chair and the dean demoted. After this fails, she decides she wants to sue the university and asks legal advice if she has a

10:00 ~ I'm Not in Love 1971 | Rebelmalt | [UNL] | Advocate Financial Information | University student makes a dumb decision

reddit.com/r/subredditDrama/comments/ebod10/university\_student\_makes\_a\_dumb\_decision/

reddit r/subredditDrama Search

disorder, expecting that to resolve the situation.

She doesn't get the response she wants, so she feels that the chair was negligent, and gets the provost, Board of Regents, and faculty senate involved in an attempt to have the chair and the dean demoted. After this fails, she decides she wants to sue the university and asks legal advice if she has a case. She decides against the lawsuit, but then tries to go to the media about the supposed dysfunction in the university. The media don't listen either and she's still convinced she's the victim here.

All the while, she keeps submitting posts asking about whether she should go to grad school at the same university, and says she wants to become a professor at the same university. At this point, she is 100% blacklisted from any position, staff or student, at the university, but she doesn't seem to understand that that has happened. She also says she never wants to leave the city she's in, has a fear of flying, is a wild germophobe (and plans to dismiss students if they have even a hint of a cold), and (shockingly) can't deal well with stress, but still believes she can become an academic.

Finally, she starts revealing that she has a non-sexual infatuation with this professor (who clearly wants nothing to do with this insane student anymore). She's convinced she can make up to her and be the professor's friend. The retired professor is ignoring all of her messages, but she just keeps trying to get in touch. She even asks legal advice "Is this stalking?", they say "yes", and she continues to try to contact this poor woman she tried (and failed miserably) to ruin the career of for no reason.

The comments in OP's most recent non-removed post say it all:

[https://www.reddit.com/r/AskProfessors/comments/e938ag/friendships\\_with\\_undergrads/faga4ol/](https://www.reddit.com/r/AskProfessors/comments/e938ag/friendships_with_undergrads/faga4ol/)  
Like watching a slow trainwreck - over and over again.  
just when you think it's fully crashed, nope - she's still going

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TheZodiacTwins -76 Karma

Got Coins

1. No trolling, hate speech, or using slurs
2. No insults, flamewars, or flamewar bait
3. No /u/ summoning user from linked thread
4. No off-topic grandstanding
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8. Avoid bias in your title or in your write-up. Try to stay neutral.
9. Don't make us hunt for the drama
10. Don't submit off-site drama or posts that aren't drama at all.
11. Don't post or vote in linked threads

8:02

16





Unlited x Google x How St x Peter's x New St x Harast x Google x Google x Google x Blockl x Doven x + ☆ ☆ ☆

← → G removeddit.com/r/PhD/comments/efu/a7LJ

tell me if she did? What if this cost her ementa status or decreased her salary, for example? What if the complaint is on her record? (She's near retirement, but it would still be a "stain" on her record.)

Again, I'm not comparing your situation (involving actual abuse) to mine, and I am glad to hear you have a better advisor now.

permalink reddit reddit

[+] milhistoryguy 11 points 1 years ago

wait you wrote to the chair over a 'curt' email? of course she's not speaking to you!

permalink reddit reddit

[+] DousizulaBadConfing (deleted by user) 12 points 1 years ago

Oh, it gets worse.

permalink reddit reddit

[+] milhistoryguy 9 points 1 years ago

whoa, boy...

permalink reddit reddit

[+] TheBaeC (deleted by user) 1 point 1 years ago

FYI, the 'curt' email was considered as such because the professor did not congratulate her on the conference proposal, wish her luck with it, and did not use a closing.

The 'substandard' paper which started the whole ordeal was an A- (with as feedback: "a clear thesis" and "28/30 - a very good result"). OP was also told that she could contact her (the professor) in the future re: grad. school applications and finished the course with an A.

OP did not burn a bridge. OP burned the strongest bridge in history

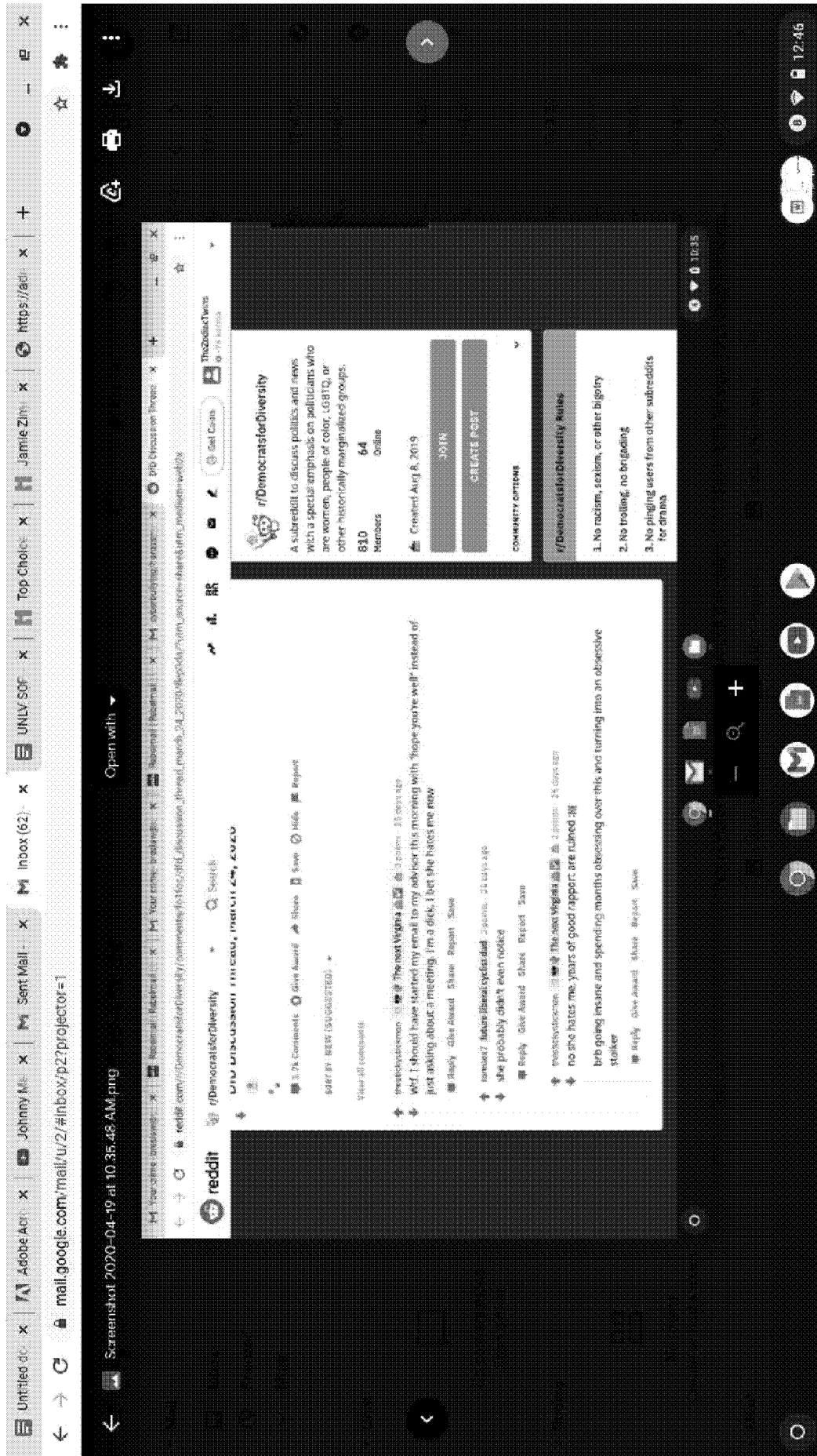
permalink reddit reddit

[+] Genia725 (deleted by user) -4 points 1 years ago

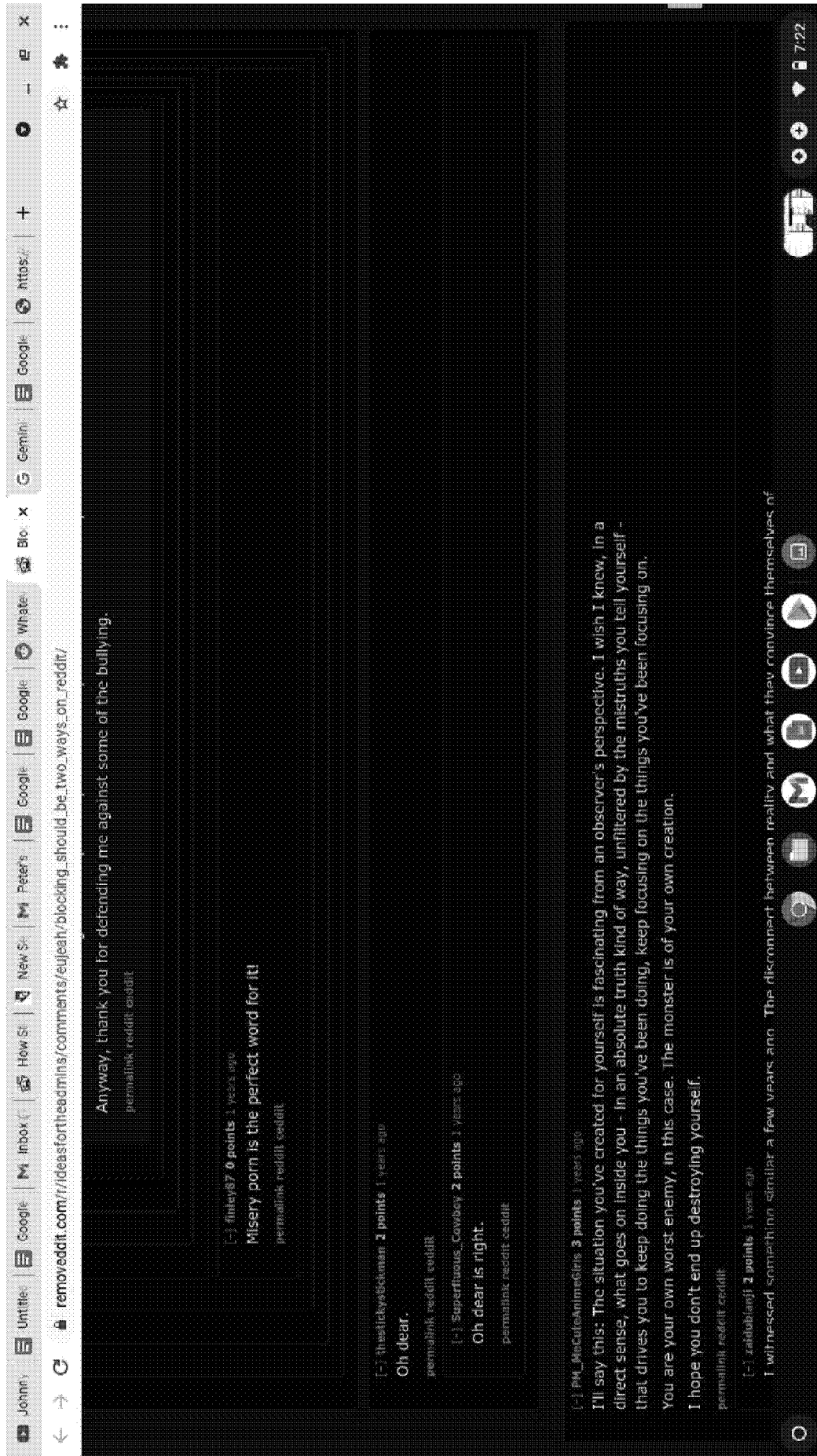
Yes, but my anxiety was out of control during this period. This professor was someone I very much admired/looked up to, and I couldn't handle the thought of her being upset with me. I acknowledged that I overreacted and wanted to make sure that she didn't suffer from the grievance. (I even requested that it be removed from her record if it was on there.)

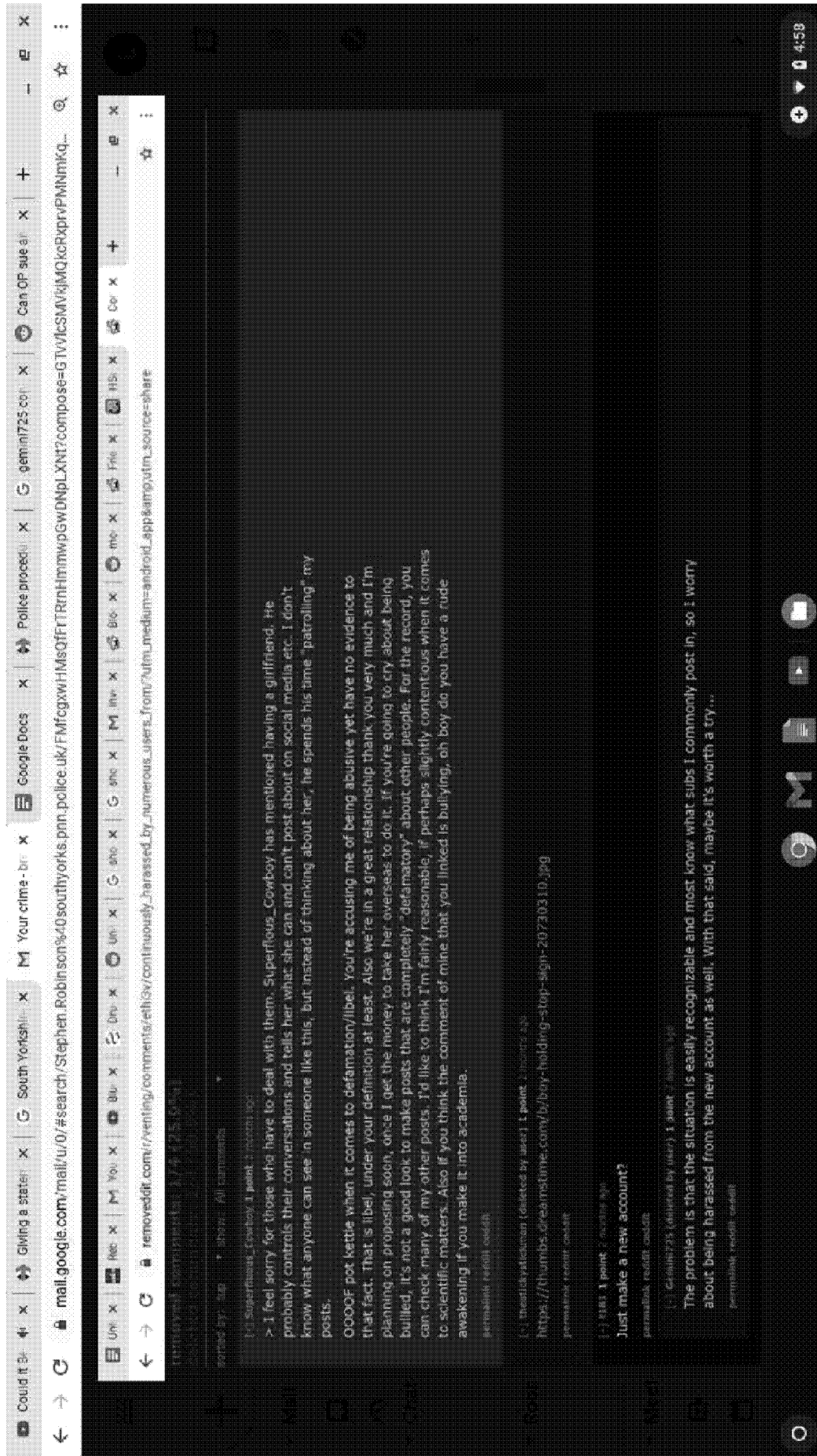
8:11

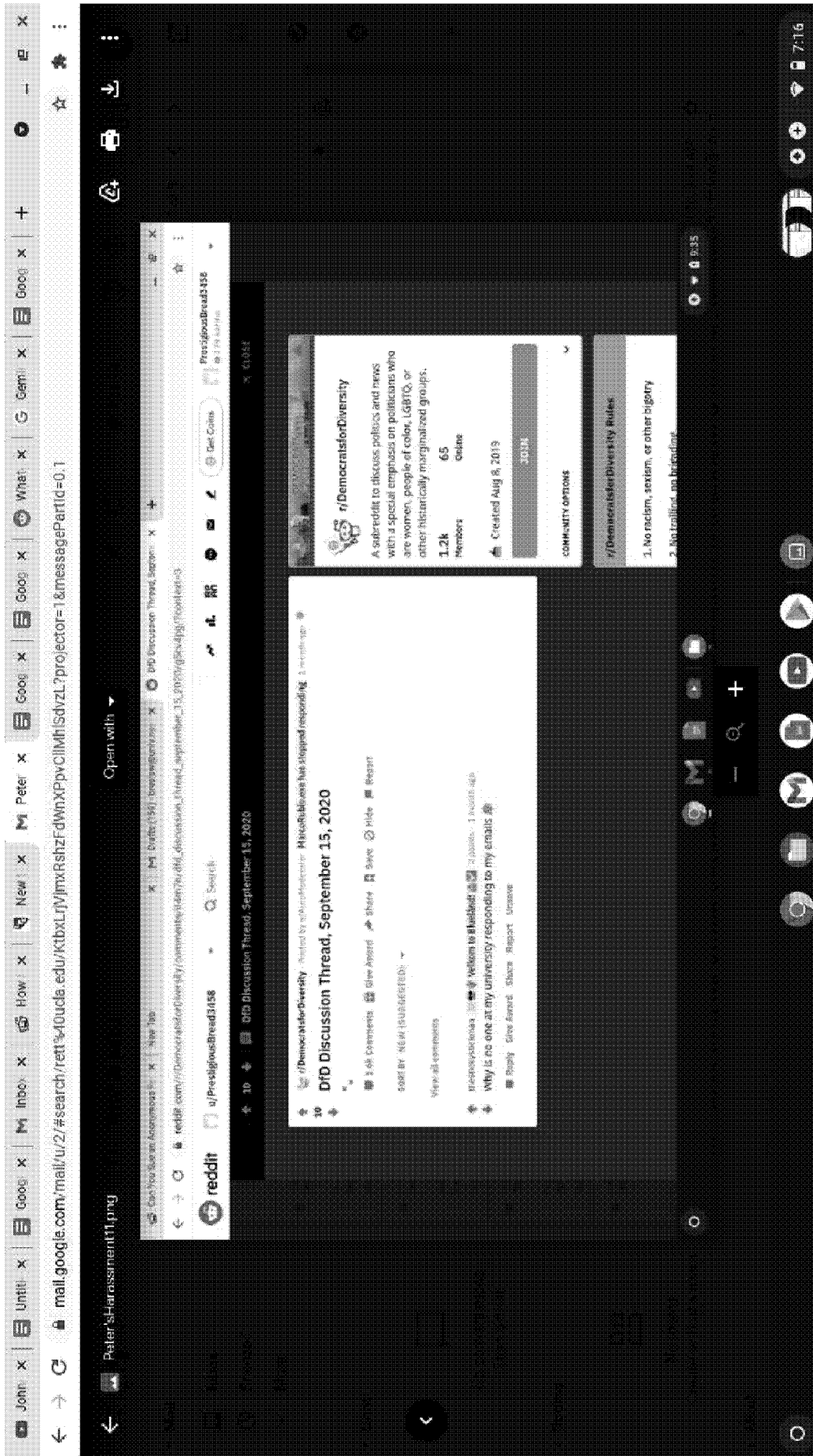


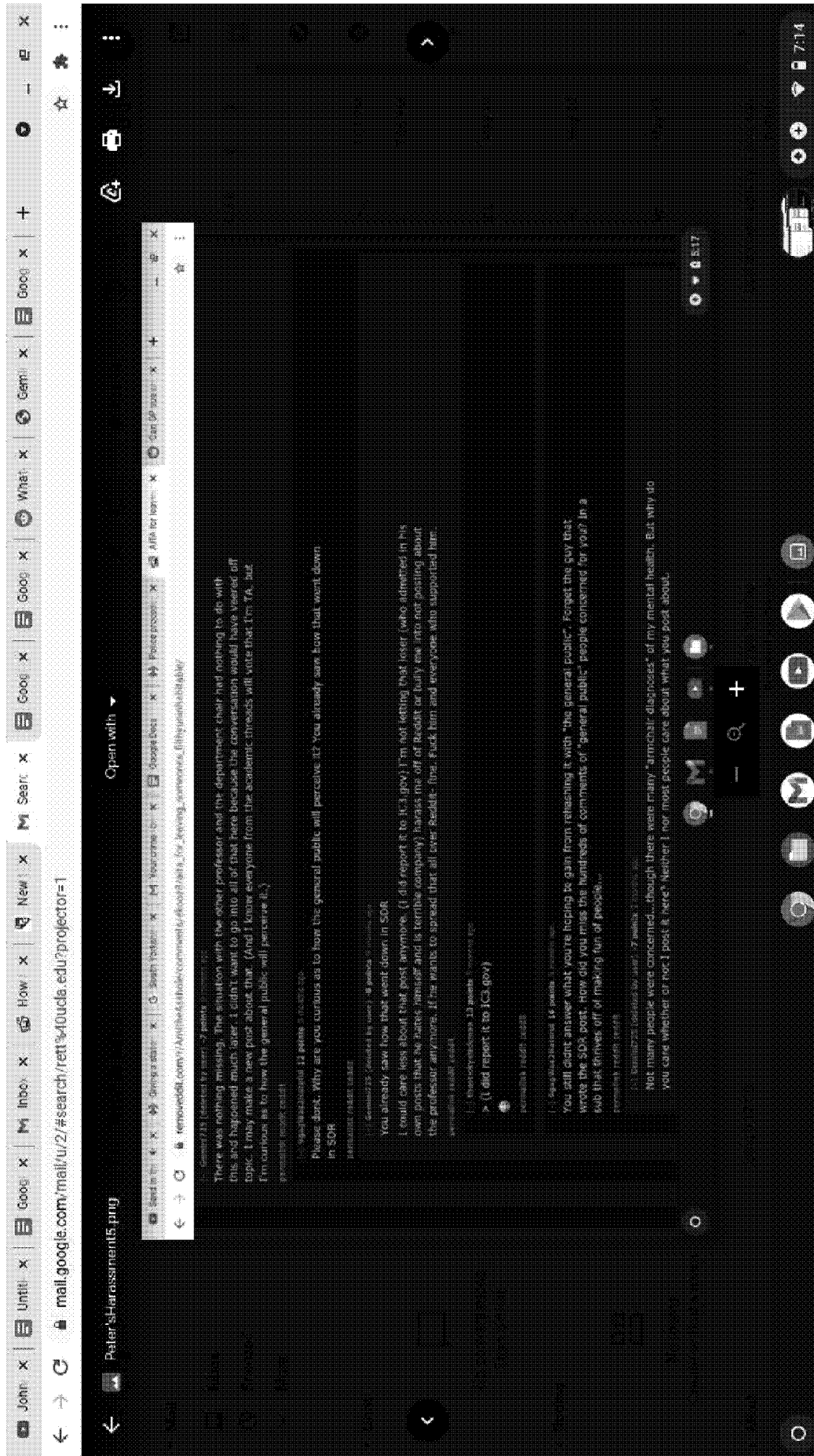




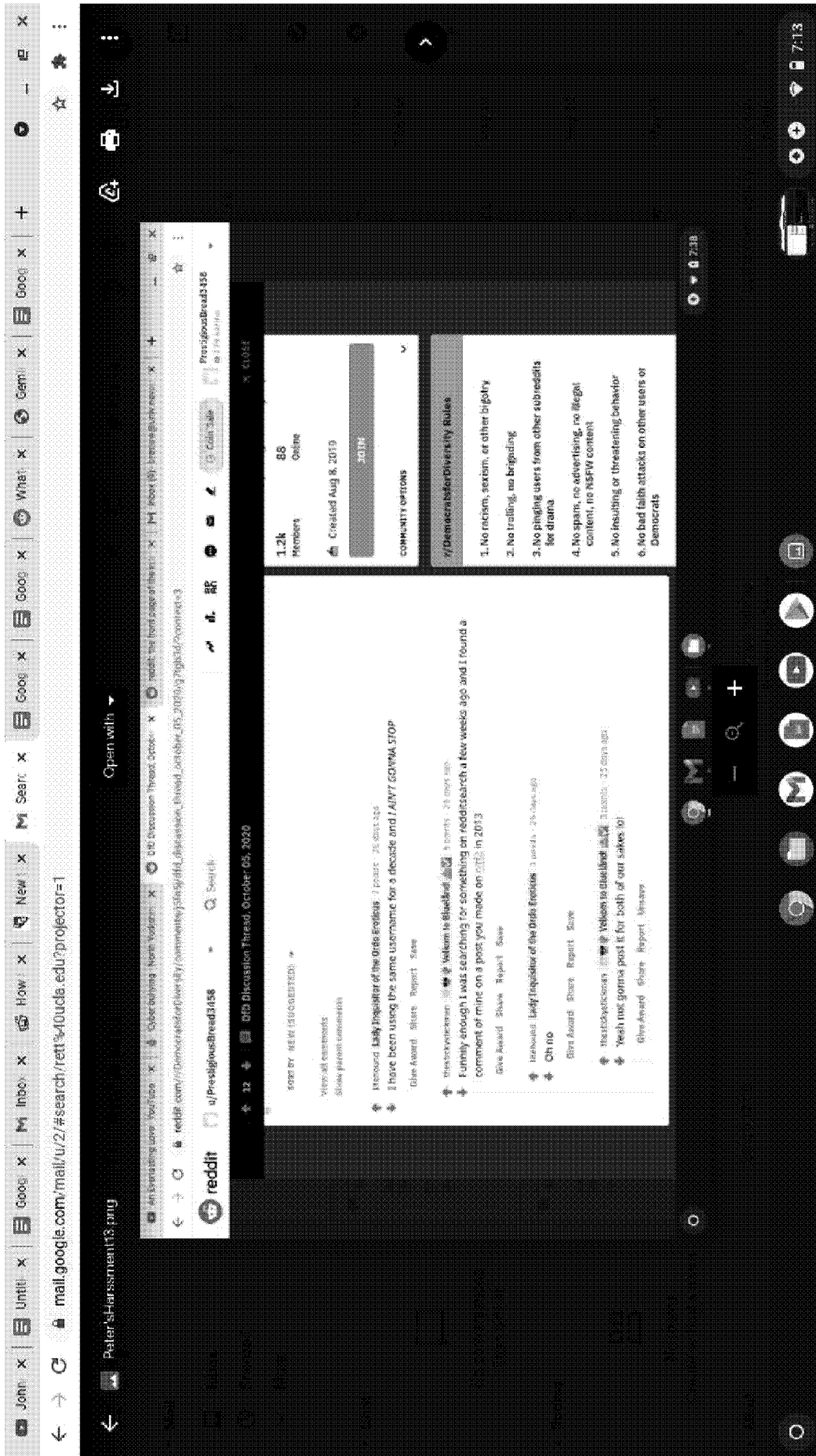






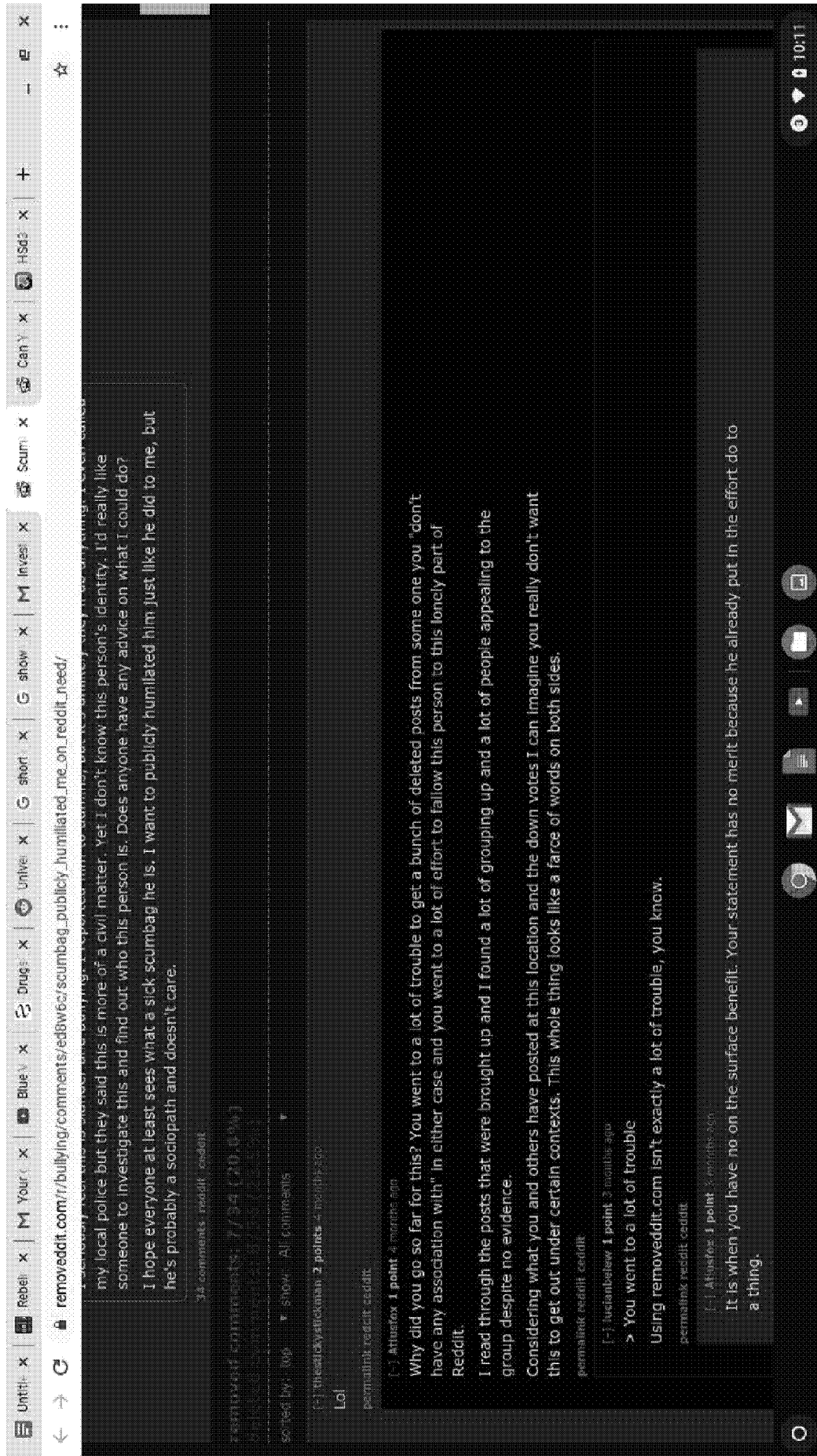


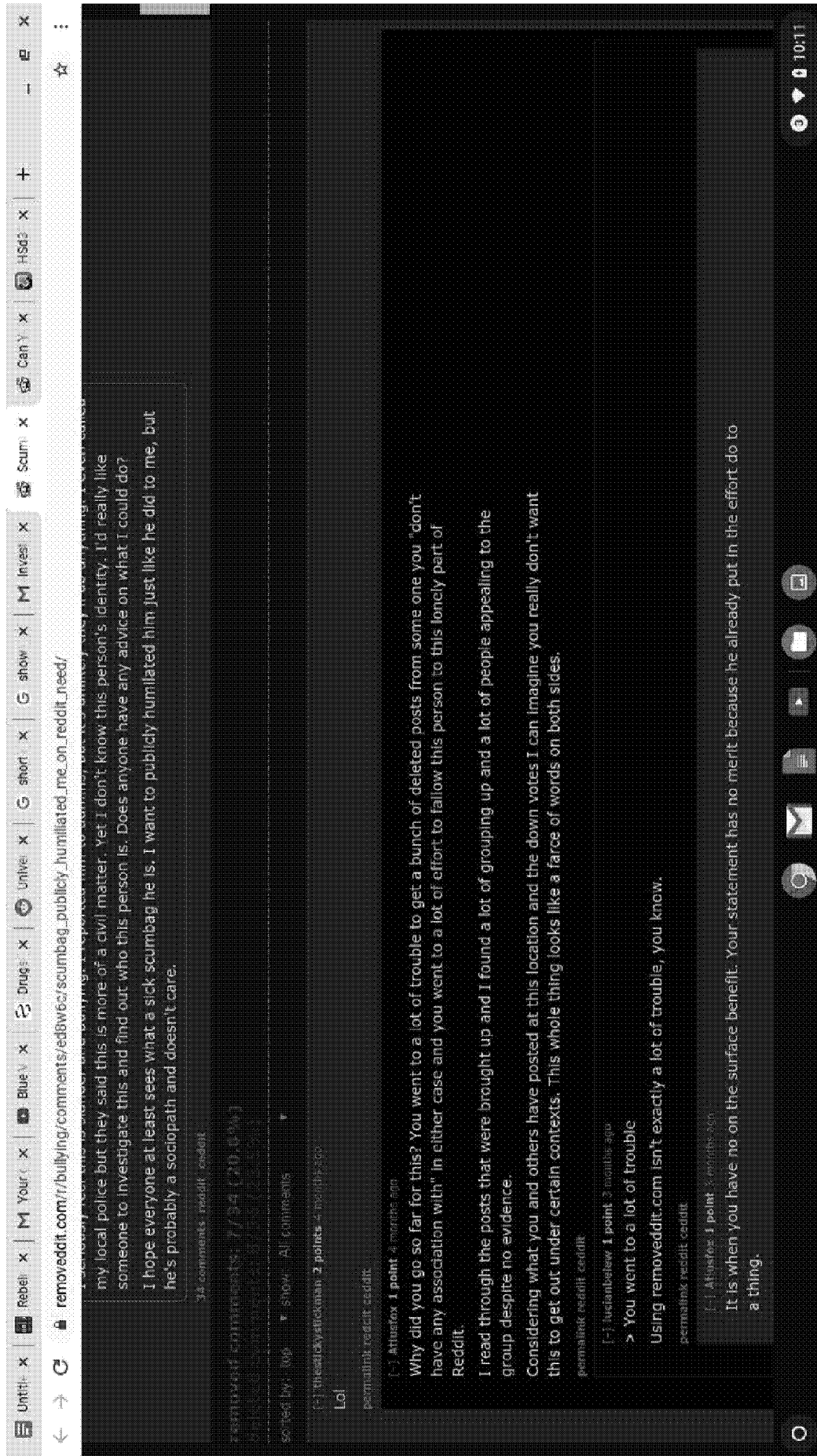












JUDY COLLINS - 'Both Sides No...'

sheffield civil court uk - Google

Discussion Thread - neo liberal

thetickystickman (u/thetick...

←

→

G

reddit.com/user/thetickystickman/comments/

reddit

u/thetickystickman

Discussion Thread

Search

thetickystickman commented on Discussion Thread

Discussion Thread

Posted by u/jobautomator

banmod for prez

thetickystickman

United Nations

1 point · 5 hours ago

I've never been very careful about protecting my identity online (foolishly). I've posted my full name before and, selfies and stuff. You could probably find my Facebook account in like 20 minutes if you were obsessive like her.

1 don't think she got like my address or whatever, she just found my Facebook and figured out I was in South Yorkshire. The policeman I spoke to didn't even know what city I was in.

Reply

Give Award

Share ...

thetickystickman

United Nations

3 points · 5 hours ago

[https://reddit.com/r/subredditDrama/comments/ebod10/university\\_student\\_makes\\_a\\_dumb\\_decision/](https://reddit.com/r/subredditDrama/comments/ebod10/university_student_makes_a_dumb_decision/)

Reply

Give Award

Share ...

thetickystickman

United Nations

6 points · 5 hours ago

She found my Facebook account and sent it to the police, who contacted me on Messenger. The cop was kinda confused and said it was basically just internet bickering, but they had to let me know anyway. It was weird.

Reply

Give Award

Share ...

thetickystickman

United Nations

6 points · 5 hours ago

This lady who was posting to a bunch of academic subs about whether it was appropriate to stalk her professor. She claimed it was libel and harassment so she found my real name and called my local police.

Tbf it was pretty stupid to post that on my main account.

Reply

Give Award

Share ...

thetickystickman

United Nations

11 points · 5 hours ago

lol someone called the cops on me because of an SRD post once

Reply

Give Award

Share ...

BACK TO TOP

29



## Removeddit

/r/all about & FAQ



766

[UPDATE] Received a message from the South Yorkshire Police informing me about apparent harassment of a woman from Las Vegas on Reddit, what does this mean and what do I do? [update](#) (self.LegalAdviceUK)

submitted 1 year ago by LegalAdviceUK

Original post

Before making my post, I had called my local station, and they confirmed that there was an officer with the Facebook account's name working in the same branch, so I was told to ask them for a contact number. I replied to the Facebook message doing so, and then came on here and made my post.

This afternoon, the officer replied to me on Messenger with a number, but following the advice given on my other post, I called the station again and asked them to request that he send me an email from his [pin.police.uk](mailto:pin.police.uk) account. A few hours later, I received an email from the officer's official email account giving the same contact number that was sent via Facebook. **The Facebook messages were real**, contrary to what everyone here believed.

I called the number and spoke with the officer, who was a very nice man and told me that the screenshots they had been sent boiled down to "online bickering", and he said it was "one of the weakest cases he had seen", but they had to contact me because that was procedure, of course.

He said that the complaint has been recorded in their database and might show up on an enhanced DBS check, but not to worry because those checks are rare for most jobs, there's nothing of serious note in the report, and I have a very common name, so it is unlikely to even be traced back to me.

All in all, I've learned a valuable lesson about protecting my identity online, my only major concern now is that I have a mentally unstable online stalker who feels wronged. I'm taking precautions to protect my online presence now, and fortunately, she lives on the other side of the world from me.

150 comments reddit reddit

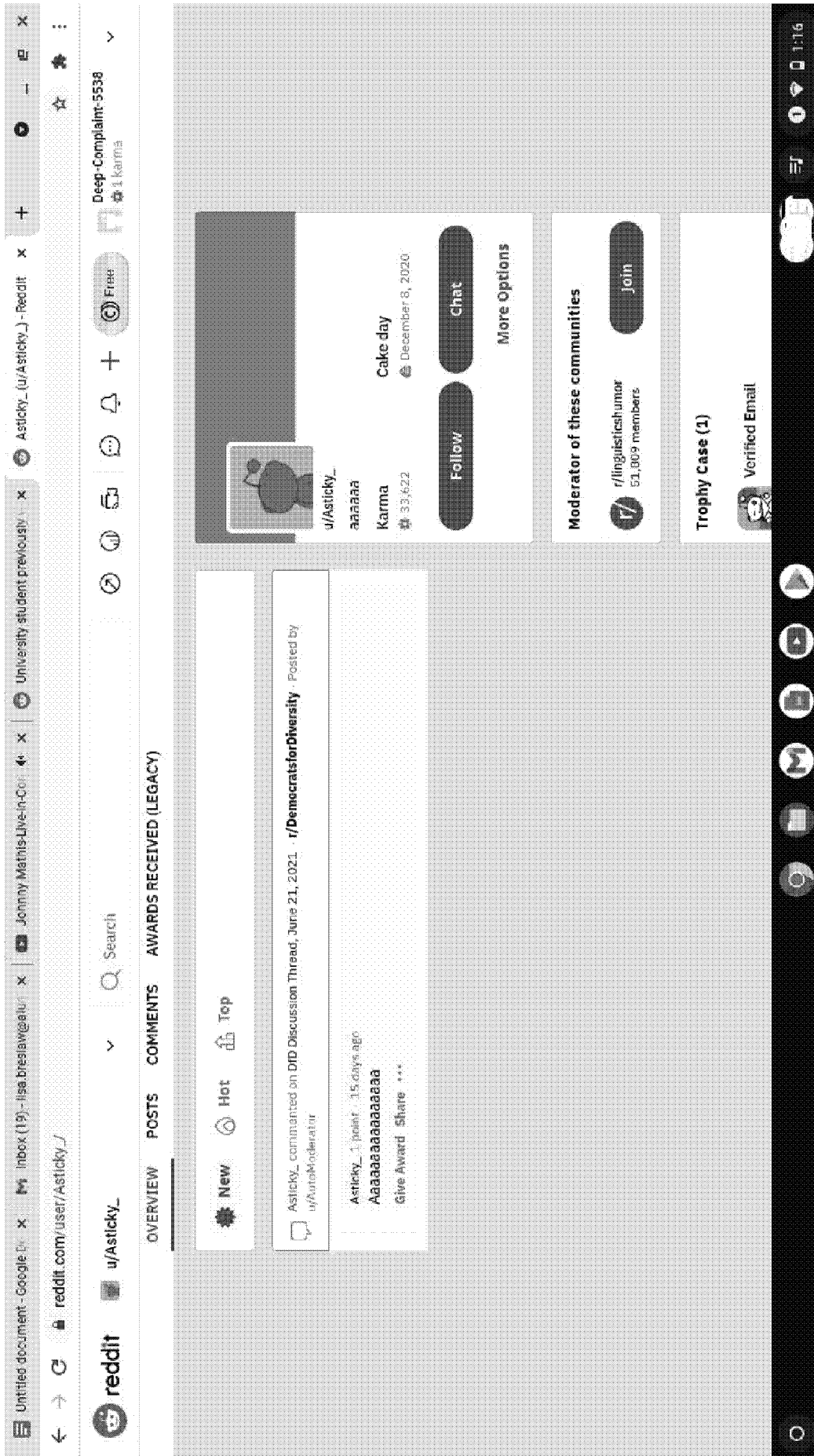
removed comments: 18 (17% (10.4%))

deleted comments: 4 (17% (10.4%))

removed from front page: 0 (0% (0.0%))

removed from all comments page: 0 (0% (0.0%))









Untitled document - Google Docs

Inbox (19) - Lisa.Breslaw@gmail.com

Jonny Mathis-Live-In-Conceal

University student previously

Whatever happened to the woman who was obsessed?

reddit.com/r/internetdrama/comments/osreah/whatever\_happened\_to\_the\_woman\_who\_was\_obsessed/

reddit

r/internetdrama

Search

Deep-Complaint-5538

1 karma

279

↑

↓

Whatever happened to the woman who was obsessed with her professor and doxed a redditior? [backstory included]

Tue Jun 22 2021 09:41:02 GMT-0700 (Pacific Daylight Time)

Posted by u/forbetterorbetterior 15 days ago

I am using an alt to make this post because the entire situation is bizarre and creepy.

I have done research into this but there has been no hide nor hair of this person in months. I think she may have been suffering from a mental health episode.

**Beginning: Professor Obsession**

This started a little over a year ago. I am not going to retell this story. You can read the [SRD post here](#) for a good overview, which will come into play later.

TL;DR: This woman is in her mid to late thirties. She develops an infatuation with her professor and posts about it incessantly with the username [u/gemini725](#).

Here is an archive of some of her posts about the situation: [https://raredit.com/r/legaladvice/comments/e7cj47/would\\_this\\_be\\_considered\\_stalking/](https://raredit.com/r/legaladvice/comments/e7cj47/would_this_be_considered_stalking/)

**SRD Post and beginning of Reddit doxxing obsession**

A reddit user [u/rhethickystickman](#) made an SRD post (same one linked above) about this woman [https://www.reddit.com/r/internetdrama/comments/osreah/whatever\\_happened\\_to\\_the\\_woman\\_who\\_was\\_obsessed/](https://www.reddit.com/r/internetdrama/comments/osreah/whatever_happened_to_the_woman_who_was_obsessed/)

About Community

r/

internetdrama

A place to linking to and discussing drama that occurs anywhere on the internet. Slapfights, vindictive blogger wars, internet celebrity meltdowns, social media shiffts, obscure forum drama, historical internet drama, etc etc.

32.0k Members

73 Online

Created Sep 8, 2010

Join

Create Post

34



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Inbox (19) - Lisa.breslaw@alu

Jonny Mathis-Live-In-Conce

University student previously

[TOMT][Reddit Posts] [late 20

reddit.com/r/tipofmytongue/comments/9czog/tomtreddit\_posts\_late\_2010s\_woman\_who\_is\_obsessed/gntdpu0/

reddit

r/tipofmytongue

Deep-Complaint-5538

1 karma

Free

Search

Post "Pending"?

Solving Your Post

Proper Title Format

Message the Mods

FAQ

It's on the...

r/TipOfMyTongue

4

[TOMT][Reddit Posts] [late 2010's] Woman who is obsessed with her professor

Solved

Posted by u/nonconformistnugget 5 months ago

9 Comments

Award

Share

Unsave

Hide

Report

SCRT BY OLD (SUGGESTED)

View all comments

500scuds · 4m

28

Probably u/Gemini725, who has since deleted everything. But this SRD post details the whole thing

3

Reply

Give Award

Share

Report

Save

nonconformistnugget OP · 4m

Holy shit Solved!

About Community

r/tipofmytongue

Can't remember the name of that movie you saw when you were a kid? Or the name of that video game you had for Game Gear? This is the place to get help. Read the rules and suggestions of this subreddit for tips on how to get the most out of TOMT. (Located right side on desktop, varies on mobile.)

1.7m

sleuths

3.7k

Sleuths Online Now

Created Aug 12, 2009

Join

Create Post

1:57

Electronically Filed  
7/15/2021 5:42 PM  
Steven D. Grierson  
CLERK OF THE COURT

*Steven D. Grierson*

CASE NO: A-21-837948-C

Andrew Kirk

Gmail

Active

X

X

Andrew Kirk

Gmail

Active

X

X

Mail

Inbox

Snoozed

More

Chat

No conversations  
Start a chat

Rooms

No rooms  
Create or find a room

Meet

Andrew Kirk <andy.kirk@unlv.edu>  
to John, me

Dear Lisa,

Apologies for being to be somewhat slow in responding to this most recent message. I was out of the office much of Monday and Tuesday at work related history events with very limited access to email.

I had a scheduled meeting for today with the Dean and Associate Deans of the College to discuss your situation as a group in person. We did so at length. I also have a follow up phone conversation scheduled for tomorrow with Dr. Gallo. Again I want to say that I am very sorry that you have experienced distress over communications with a faculty member and assure you that your concerns have been taken very seriously with considerable time dedicated to formally recording your specific grievances and discussing your situation. Your objections to the tone of the email communication in question have also been formally recorded and discussed with the Office of Student Affairs in the Provost's Office at UNLV.

I hope you will hear directly from Professor Gallo following our scheduled discussion tomorrow.

Sincerely,



**Andrew Kirk**  
Professor of History  
Department Chair  
Department of History  
University of Nevada, Las Vegas  
andy.kirk@unlv.edu  
Office: 702-895-3544

Web · Twitter · Facebook · Instagram · YouTube

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7/15/2021 5:42 PM  
Steven D. Grierson  
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*Steven D. Grierson*

CASE NO: A-21-837948-C  
REELS Department 3

Search Marcia Gallo

Active

Mail

Inbox 17

Starred

Snoozed

Sent

18 of 32

Mon, May 10, 8:37 PM

### Fwd: recommendations?/Inspired by your work

**Lisa Breslaw** <breslaw@unlv.nevada.edu>  
to bcc: me

Forwarded message

From: **Lisa Breslaw** <breslaw@unlv.nevada.edu>  
Date: Wed, Jan 2, 2019 at 3:26 PM  
Subject: Re: recommendations?/Inspired by your work  
To: **Marcia Gallo** <marcia.gallo@unlv.edu>

Thank you. I'm still researching schools but intend to apply to some within the year. Happy New Year to you too!

Sincerely,  
Lisa Breslaw

On Wed, Jan 2, 2019 at 5:27 AM **Marcia Gallo** <marcia.gallo@unlv.edu> wrote:  
Hello Lisa - Happy New Year!

Yes you may list me as a work reference and contact me in future regarding grad school applications.

Sincerely,  
Dr. Gallo

Electronically Filed  
7/15/2021 5:42 PM  
Steven D. Grierson  
CLERK OF THE COURT

*Steven D. Grierson*

Belamy Brothers | Rebelmail | Rebelmail | Advocate Application: | Advocate Financial Info: | Advocate Financial Info: | University student makes a dumb decision/

reddit.com/r/SubredditDrama/comments/ebod10/university\_student\_makes\_a\_dumb\_decision/

reddit r/SubredditDrama

Search

CASE NO: A-21-837948-C Department 3

**r/SubredditDrama**

3.9k

Posted by u/thestickystickman 7 months ago

**Unironically had the police called on me b/c of an SRD post**

**University student makes a dumb decision regarding her professor while applying to grad school, descends over the course of three months into an obsessive stalker who's turned an entire university faculty against her.**

EDIT: OP deleted all their posts, so I've updated them with removeddit links.

Original post from which OP's saga unfolds. I originally wrote this as a TL;DR on another sub somewhere, but I wanted to share it here because it's honestly an insane story and it's fascinating watching OP make the wrong move at *every single turn* and ignore every single piece of advice the users give her until everybody she's burned every possible bridge that was open to her many times over.

The details of the story came out very non-sequentially, over the course of several months, and embedded in long, multi-paragraph posts. As such, it's been too difficult to punctuate the story with links. I would suggest you just read the posts in the OP's userpage from old to new. There aren't that many, and it descends from a student making a misstep due to poor judgment and anxiety down to OP stalking her retired professor with whom she has become completely obsessed.

OP is a mature student (F/late 30s) who just finished her undergrad with a 3.93 GPA and 6 graduate credits. Due to some housing insecurity in her last semester (during which she seems to have stayed at

**About Community**

**r/SubredditDrama**

The place where people can come and talk about reddit fights and other dramatic happenings from other subreddits.

643k Members 3.7k Online

Created Aug 25, 2011

JOIN

CREATE POST

COMMUNITY OPTIONS

OP is a mature student (F/late 30s) who just finished her undergrad with a 3.93 GPA and 6 graduate credits. Due to some housing insecurity in her last semester (during which she seems to have stayed at a faculty member's house for two days), she had to get a two-day extension on a research paper. The professor allowed it, but said she wasn't happy about it. She finishes the paper and gets an A-, and she takes that as a sign that the paper was awful. She keeps repeating some feedback she got on it ("a clear thesis" and "28/30 - a very good result") as a sign that the professor thinks it was awful and only gave her that mark out of pity.

She wants to approach the professor about grad school and a letter of recommendation, but she doesn't feel comfortable asking her after the horrible paper she had just written (the one that got an A-). So she just asks if she can contact her at a later time about grad school, to which the professor replies that she "could contact her in the future re: grad. school applications." She takes this as meaning that the professor doesn't want to write her a LoR because she isn't qualified enough yet (???), so she applies a proposal for a conference, gets accepted, and then tells her professor about it and that they would collaborate on it.

The professor obviously replied that she would not be able to help on this, as A) you can't just do that and expect them to go along with it, and B) as OP already knew at that point, the professor was retiring after that semester. She offers to withdraw from the conference, but her professor doesn't respond. OP perceives this as rude and cold, so she goes to the chair of the department with a complaint. She claims that she only wanted the chair to mediate the issue, not that there was an issue to mediate, but it was clearly a formal complaint, so the chair lets the dean know (both siding with the professor). OP takes this opportunity to talk directly to the dean and blame it all on her anxiety disorder, expecting that to resolve the situation.

She doesn't get the response she wants, so she feels that the chair was negligent, and gets the provost, Board of Regents, and faculty senate involved in an attempt to have the chair and the dean demoted. After this fails, she decides she wants to sue the university and asks legal advice if she has a

**COMMUNITY OPTIONS**

**Welcome!**

**NEW ANNOUNCEMENT:** Surplus drama is no longer required to be self posted, but it still needs to be quality or it will be removed.

Come join our Discord, click here to join!

For general internet drama, check out [/r/internetdrama](#)

For drama happening inside SRD, check out [/r/subreddiddramadrama](#)

For meta discussion of this subreddit, go to [/r/metasubreddiddrama](#)

Please read the rules in our rules list before commenting or submitting. For more detail on the rules, [read our wiki](#)

**r/Subreddiddrama Rules**

1. No trolling, hate speech, or using slurs
2. No insults, flamewars, or flamebait
3. No /u/ summoning user from linked thread

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All the while, she keeps submitting posts asking about whether she should go to grad school at the same university, and says she wants to become a professor at the same university. At this point, she is 100% blacklisted from any position, staff or student, at the university, but she doesn't seem to understand that that has happened. She also says she never wants to leave the city she's in, has a fear of flying, is a wild germophobe (and plans to dismiss students if they have even a hint of a cold), and (shockingly) can't deal well with stress, but still believes she can become an academic.

Finally, she starts revealing that she has a non-sexual infatuation with this professor (who clearly wants nothing to do with this insane student anymore). She's convinced she can make up to her and be the professor's friend. The retired professor is ignoring all of her messages, but she just keeps trying to get in touch. She even asks legal advice "is this stalking?", they say "yes", and she continues to try to contact this poor woman she tried (and failed miserably) to ruin the career of for no reason.

The comments in OP's most recent non-removed post say it all:

[https://www.reddit.com/r/AskProfessors/comments/e938aq/friendships\\_with\\_undergrads/faga4ol/](https://www.reddit.com/r/AskProfessors/comments/e938aq/friendships_with_undergrads/faga4ol/)

Like watching a slow train wreck - over and over again.

just when you think it's fully crashed, nope - she's still going!

[https://www.reddit.com/r/AskProfessors/comments/e938aq/friendships\\_with\\_undergrads/?page=77m/](https://www.reddit.com/r/AskProfessors/comments/e938aq/friendships_with_undergrads/?page=77m/)

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6. Do not post drama you are involved in.
7. SRD is not a call-out subreddit. Don't post links just to point out bad behavior
8. Avoid bias in your title or in your write-up. Try to stay neutral.
9. Don't make us hunt for the drama
10. Don't submit off-site drama or posts that aren't drama at all.
11. Don't post or vote in linked threads



100% - Im Not in Love 19/11/2018

Rebelmail | Rebelmail | UNLV | M Advocate Financial Information

reddit.com/r/SubredditDrama/comments/ebod10/university\_student\_makes\_a\_dumb\_decision/

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TheZodiacTwins -76 karma

9. Don't make us hunt for the drama

10. Don't submit off-site drama or posts that aren't drama at all.

11. Don't post or vote in linked threads

professor's friend. The retired professor is ignoring all of her messages, but she just keeps trying to get in touch. She even asks legal advice "is this stalking?" they say "yes", and she continues to try to contact this poor woman she tried (and failed miserably) to ruin the career of for no reason.

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Going out on a limb here to say most people do not wish to be friends with people who are obsessed with them and who are stalking them regardless of age. It's pretty creepy and probably unsettling.

[https://www.reddit.com/r/AskProfessors/comments/e938ag/friendships\\_with\\_undergrads/fah3b5w/](https://www.reddit.com/r/AskProfessors/comments/e938ag/friendships_with_undergrads/fah3b5w/)

Please, I BEG OF YOU. Stop posting. For the love of everything holy to every religion, why are you still posting? You have been told the same thing, quite literally hundreds of times. You're now going into wild hypotheticals. Please. Stop posting.

[https://www.reddit.com/r/AskProfessors/comments/e938ag/friendships\\_with\\_undergrads/fagup1/](https://www.reddit.com/r/AskProfessors/comments/e938ag/friendships_with_undergrads/fagup1/)

OH MY GOD

1 3 1 3 3

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96% Upvoted

Moderators

u/stopsopicsme has abandoned you all

u/TAKEITTOCIRCLEJERK Caballero Blanco

WE KNOW DRAMA

"Popcorn tastes good" /u/KN0THING

41

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7/15/2021 5:42 PM  
Steven D. Grierson  
CLERK OF THE COURT

*Steven D. Grierson*

109 ↑ ↓

43 ↑ ↓ Reply Give Award Share Report Save

lunamothhead · 3m

Honestly, I would remove this post because I feel like OP will just find this account and proceed to stalk you for the rest of its duration.

17 ↑ ↓ Reply Give Award Share Report Save

DovahzulsABadConlang · 3m

She already knows about this account. I mentioned that it was me on another post which I know she saw.

9 ↑ ↓ Reply Give Award Share Report Unsave

lunamothhead · 3m

yikes, having dealt with a stalker before, you can be sure that she is checking your profile every day as a fix. It's how they are. I would make a new account ASAP.

11 ↑ ↓ Reply Give Award Share Report Save

TauriKee · 3m

Dude. Restraining order. Now.

6 ↑ ↓ Reply Give Award Share Report Save

9. Don't make us hunt for the drama

10. Don't submit off-site drama or posts that aren't drama at all.

11. Don't post or vote in linked threads

"Popcorn tastes good" /s/KNOTHING

WE KNOW DRAMA

Moderators

Message the moderators



Again, I'm not comparing your situation (involving actual abuse) to mine, and I am glad to hear you have a better advisor now.

[~] millisteryquy 13 points 1 years ago

permatum reddit reddit

Oh, it gets worse.

[7] milkstoryguy 9 points 1 years ago

DePaul University, Chicago, IL

Finally, the 'curt' email was considered as such because the professor did not congratulate her on the conference proposal, wish her luck with it, and did not use a closing.

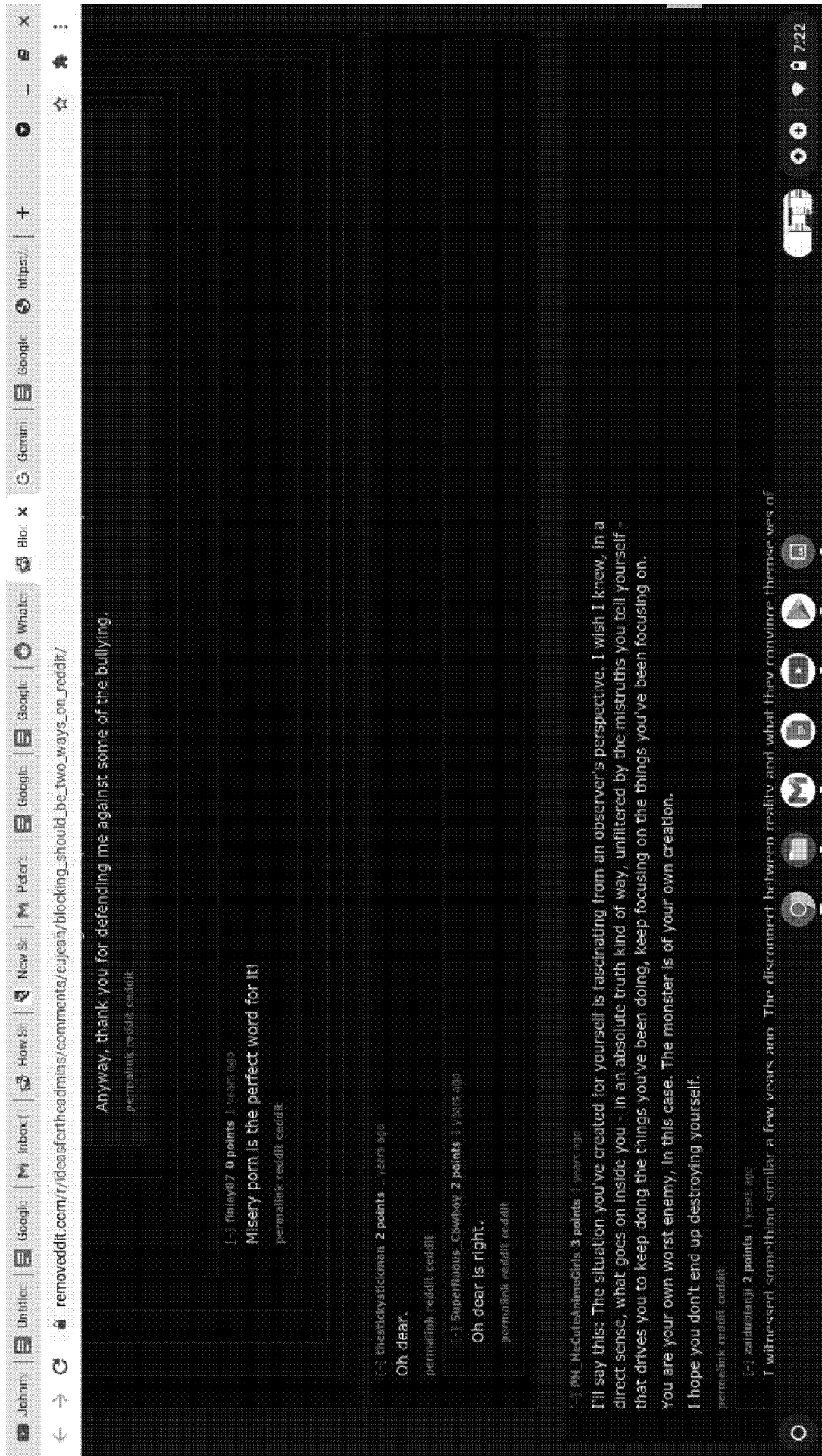
OP did not burn a bridge. OP burned the strongest bridge in history

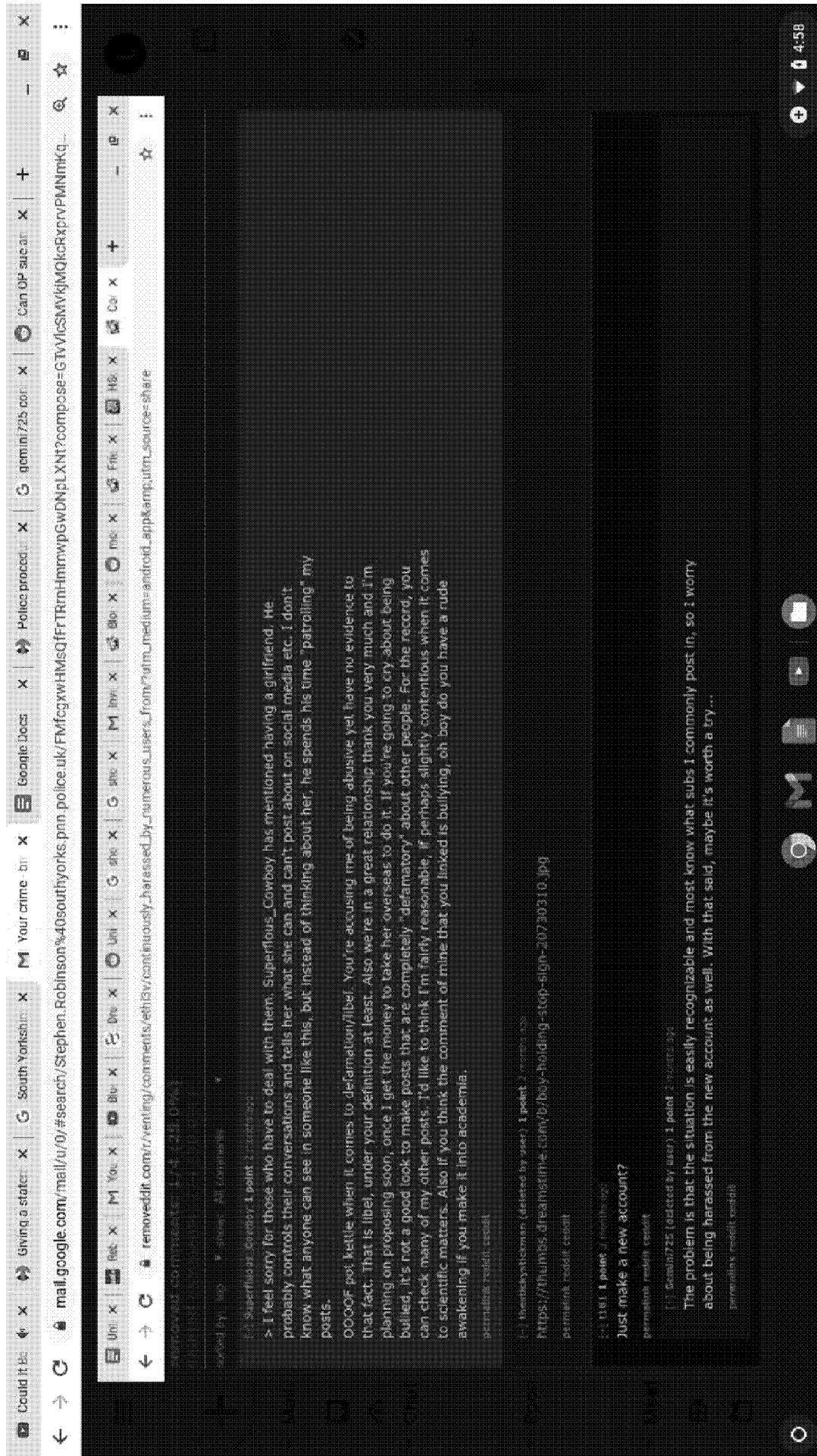
1 - Gamlrw225 (deleted by user) -4 points 1 years ago

Yes...but my anxiety was out of control during this period. This professor was someone I very much admired/looked up to, and I couldn't handle the thought of her being upset with me. I acknowledged that I overreacted and wanted to make sure that she didn't suffer from the grievance. (I even requested that it be removed from her record if it was on there.)









mail.google.com/mail/u/2/#search/reit%40ucia.edu/KtbtLrjYmxRshzFdWnXPPvCilMHsdyL?projector=1&messagePartId=0.1

Peter's Harassment ID.png

Open with



are defined, people are taking reality...

other historically marginalized groups.

1.2k Members  
57 Online  
Created Aug 8, 2019  
Join

COMMUNITY OPTIONS

DemocratDiversity Rules

1. No racism, sexism, or other bigotry
2. No trolling, no brigading
3. No pinging users from other subreddits for drama
4. No spam, no advertising, no illegal content, no NSFW content
5. No insulting or threatening behavior
6. No bad faith attacks on other users or

Sort by: NEW (UNSUBMITTED)

Flow all comments

Now comments cannot be posted

Comments:

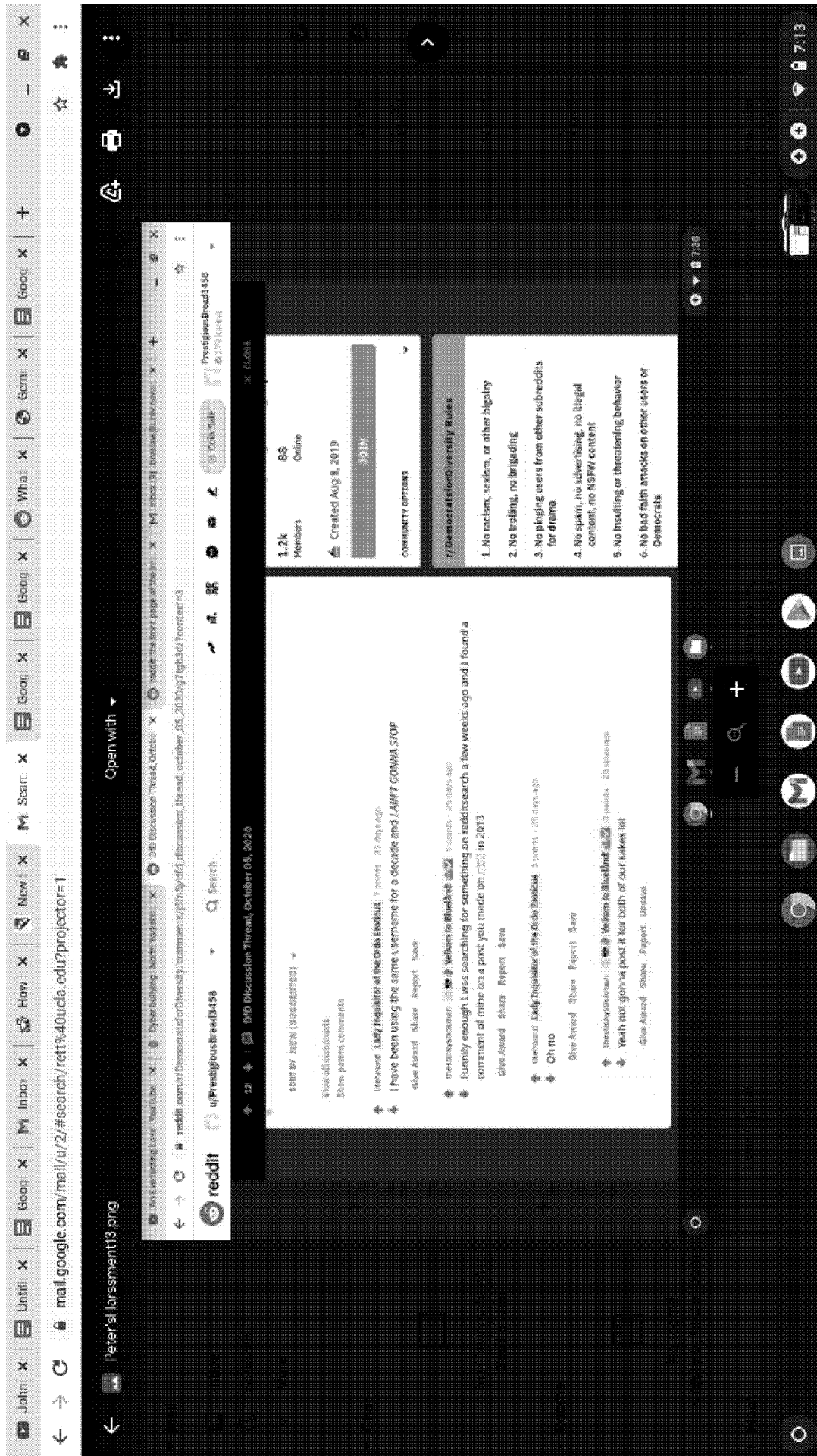
- Hesychasman: I've kept track of what I've said and I think I'm doable if you put some things together, but who'd wanna ROXX me lol. 3 points, 22 days ago. Give Award Share Report Save
- Hesychasman: I've kept track of what I've said and I think I'm doable if you put some things together, but who'd wanna ROXX me lol. 3 points, 22 days ago. Give Award Share Report Save
- Hesychasman: I've kept track of what I've said and I think I'm doable if you put some things together, but who'd wanna ROXX me lol. 3 points, 22 days ago. Give Award Share Report Save







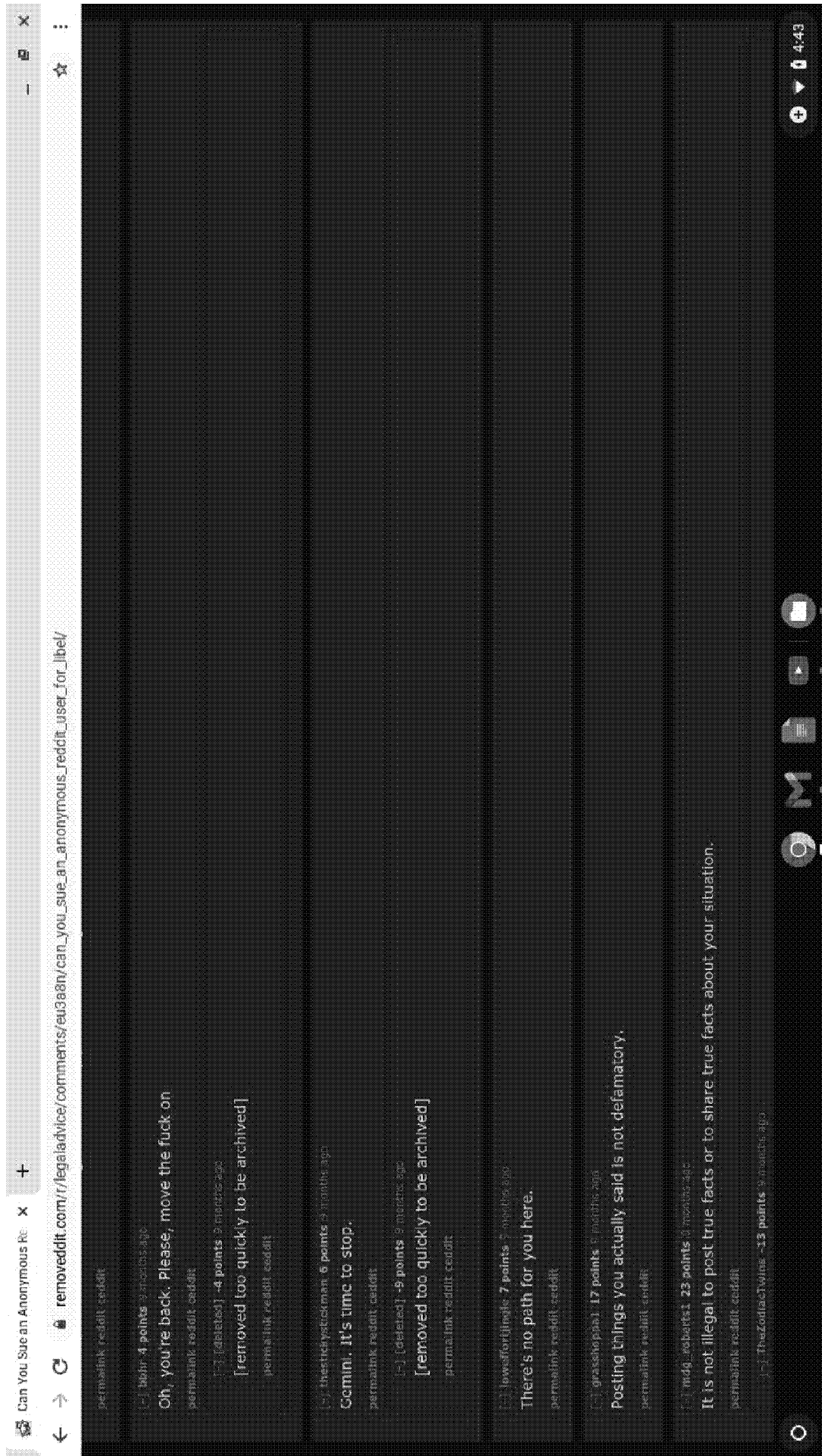




52

Reply Give Award Share ...

[illegible]



Electronically Filed  
7/15/2021 5:42 PM  
Steven D. Grierson  
CLERK OF THE COURT

*Steven D. Grierson*

CASE NO: A-21-837948-C

Gmail

Stephen.Robinson@southyorks.pnn.police.uk

Department

Compose

Inbox

Snoozed

Chats

More

Meet

Start a meeting

Join a meeting

Hangouts

Lisa

No recent chats

Start a new one



STEPHEN ROBINSON <Stephen.Robinson@southyorks.pnn.police.uk>

to me

Lisa,

I have found Peter on Facebook. I have sent him a message regarding his contact with you. I have requested that he does not have further contact with you.

As I mentioned previously we review crimes based upon the risks to the victim. Given the circumstances there is no risk to your safety and it is unlikely to escalate due to the measures you have taken to block him.

It would be inappropriate to consider a prosecution in the first instance, particularly given the complexities of the global nature of the crime.

The matter will now be closed.

Regards

...

## /r/all about &amp; FAQ

Original post

Before making my post, I had called my local station, and they confirmed that there was an officer with the Facebook account's name working in the same branch, so I was told to ask them for a contact number. I replied to the Facebook message doing so, and then came on here and made my post.

This afternoon, the officer replied to me on Messenger with a number, but following the advice given on my other post, I called the station again and asked them to request that he send me an email from his pnn.police.uk account. A few hours later, I received an email from the officer's official email account giving the same contact number that was sent via Facebook. **The Facebook messages were real**, contrary to what everyone here believed.

I called the number and spoke with the officer, who was a very nice man and told me that the screenshots they had been sent boiled down to "online bickering", and he said it was "one of the weakest cases he had seen", but they had to contact me because that was procedure, of course.

He said that the complaint has been recorded in their database and might show up on an enhanced DBS check, but not to worry because those checks are rare for most jobs; there's nothing of serious note in the report, and I have a very common name, so it is unlikely to even be traced back to me.

All in all, I've learned a valuable lesson about protecting my identity online, my only major concern now is that I have a mentally unstable online stalker who feels wronged. I'm taking precautions to protect my online presence now, and fortunately, she lives on the other side of the world from me.

150 comments rec'd. catch\*



Electronically Filed  
7/15/2021 5:42 PM  
Steven D. Grierson  
CLERK OF THE COURT

*Steven D. Grierson*

CASE NO: A-21-837948-C

Stephen.Robinson@southyorks.pnn.police.uk

X

Stephen.Robinson@southyorks.pnn.police.uk

Gmail

Compose

Inbox

Snoozed

Chats

More

Meet

Start a meeting

Join a meeting

Hangouts

Lisa

No recent chats

Start a new one



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150 comments recast credit



Electronically Filed  
7/15/2021 5:42 PM  
Steven D. Grierson  
CLERK OF THE COURT

*Steven D. Grierson*

Unsaved document Google Docs | Inbox (19) | lisa.breslaw@alum... | Johnny Mathis Live In Con... | Asticky\_ (u/Asticky\_) - Reddit | X

reddit.com/user/Asticky\_

reddit u/Asticky\_ CASE NO: A-21-837948-C Department 3

Overview Posts Comments Awards Received (Legacy)

New Hot Top

Search

u/Asticky\_

aaaaaa

Karma

33,622

Cake day

December 8, 2020

Follow

Chat

More Options

Moderator of these communities

r/linguisticshumor

51,809 members

Join

Trophy Case (1)

Verified Email

u/Asticky\_ commented on DFD Discussion Thread, June 21, 2021 · r/DemocratsforDiversity · Posted by u/AutoModerator

1 point · 15 days ago

Aaaaaaaaaaaaaaa

Give Award Share



Electronically Filed  
7/15/2021 5:42 PM  
Steven D. Grierson  
CLERK OF THE COURT

*Steven D. Grierson*

## r/internetdrama

Posts

Tue Jun 22 2021 09:41:02 GMT-0700 (Pacific Daylight Time)

Posted by u/forbetterorbetter 15 days ago

279

**Whatever happened to the woman who was obsessed with her professor and doxxed a redditior? [backstory included]**

I am using an alt to make this post because the entire situation is bizarre and creepy.

I have done research into this but there has been no hint of this person in months. I think she may have been suffering from a mental health episode.

### Beginning: Professor Obsession

This started a little over a year ago. I am not going to retell this story. You can read the [SRD post here for a good overview](#), which will come into play later.

TL;DR- This woman is in her mid to late thirties. She develops an infatuation with her professor and posts about it incessantly with the username [u/gemini725](#).

Here is an archive of some of her posts about the situation: [https://raredit.com/r/legaladvice/comments/e7cj47/would\\_this\\_be\\_considered\\_stalking/](https://raredit.com/r/legaladvice/comments/e7cj47/would_this_be_considered_stalking/)

### SRD Post and beginning of Reddit doxxing obsession

A reddit user [u/thestickysfickman](#) made an SRD post (same one linked above) about this woman

[https://www.reddit.com/r/internetdrama/comments/obteah/whatever\\_happened\\_to\\_the\\_woman\\_who\\_was\\_obsessed/](https://www.reddit.com/r/internetdrama/comments/obteah/whatever_happened_to_the_woman_who_was_obsessed/)

About Community



r/internetdrama

A place to linking to and discussing drama that occurs anywhere on the internet. Slapfights, vindictive blogger wars, internet celebrity meltdowns, social media shifts, obscure forum drama, historical internet drama, etc etc.

32.0k Members  
73 Online

Created Sep 8, 2010

Join

Create Post

Unlited documentGoogle DocsInbox (19)lisa.breslaw@alum.eduJohnny Mathis Live In Concert[TOMT][Reddit Posts] [late 2010s]reddit.com/r/tipofmytongue/comments/9czog/tomtredditt\_posts\_late\_2010s\_woman\_who\_is\_obsessed/gmtdpu0/

reddit

Deep-Complaint-55381 karma

Free

Search

Posts

Solving Your Post

Post "Pending"?

Proper Title Format

Message the Mods

FAQ

4

[TOMT][Reddit Posts] [late 2010's] Woman who is obsessed with her professor

Solved

9 Comments

Award

Share

Unsave

Hide

Report

Sort by: OLD (SUGGESTED)

View all comments

500scnds · 4m · 28

Probably u/Gemini725, who has since deleted everything. But this SRD post details the whole thing

3

Reply

Give Award

Share

Report

Save

nonconformistnugget OP · 4m

Holy shit Solved!

About Community

r/tipofmytongue

Can't remember the name of that movie you saw when you were a kid? Or the name of that video game you had for Game Gear? This is the place to get help. Read the rules and suggestions of this subreddit for tips on how to get the most out of TOMT. (Located right side on desktop, varies on mobile.)

1.7m

3.7k

Sleuths

Online Now

Created Aug 12, 2009

Join

Create Post



**EXHIBIT INDEX PAGE**

**EXHIBIT 1**

CASE NO: A-21-837948-C

Description: This is Plaintiff's initial email to Dr. Marcia Gallo re: oral history project. The Department 3 purpose of this exhibit is to demonstrate that contrary to Defendant's allegations, Plaintiff did not tell her professor that "they would collaborate" on the project.

**EXHIBIT 2**

Descriptions: Email demonstrating Plaintiff's prior good rapport with Dr. Gallo

**EXHIBIT 3**

Description: This is Plaintiff's email to Dr. Gallo offering to withdraw the proposal from the conference. This email is further evidence that Plaintiff did not tell her professor that "they would collaborate on the project."

**EXHIBIT 4**

Description: Here is UNLV History Department Chair, Andrew Kirk's, email to Plaintiff informing her that he met with the Dean's office and that there was a grievance filed against Dr. Gallo.

**EXHIBIT 5**

Description: Dr. Gallo's email informing Plaintiff that she may contact her about graduate school applications

**EXHIBIT 6**

Defendant's libelous post on subredditdrama accusing Plaintiff of stalking Dr. Gallo, telling her that they would collaborate on the project and accusing her of trying to have Dean Jennifer Keene (of UNLV's Liberal Arts College) demoted.

**EXHIBIT 7**

Defendant confirms that the account u/DovahzulsABadConlang, one of the accounts harassing Plaintiff, is him

**EXHIBIT 8**

Here is some of Defendant's harassment subsequent to the SRD post. There are also screenshots of Defendant confirming that he was contacted by the South Yorkshire Police and that that account, u/thestickystickman, was indeed him.

**EXHIBITS 9-10**

This is the email from South Yorkshire Police Officer, Stephen Robinson, confirming that they contacted Defendant over Facebook and warned him to stop harassing me.

**EXHIBITS 11-12**

Screenshots showing that Defendant's libelous post is still being shared and discussed over a year after he posted it



1 CNND

2 **DISTRICT COURT**  
3 **CLARK COUNTY, NEVADA**

4  
5 Lisa Breslaw, Plaintiff(s)

A-21-837948-C

6 vs.

Department 3

7  
8 Peter Cooper, Defendant(s)

9  
10 **CLERK'S NOTICE OF NONCONFORMING DOCUMENT**

11  
12 Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, notice is  
13 hereby provided that the following electronically filed document does not conform to the  
14 applicable filing requirements:

15 Title of Nonconforming Document:

District Court Civil Cover Sheet

16 Party Submitting Document for Filing:

Plaintiff

17 Date and Time Submitted for Electronic  
18 Filing:

07/15/2021 at 5:42 PM

19  
20 Reason for Nonconformity Determination:

- 21 ☐ The document filed to commence an action is not a complaint, petition,  
22 application, or other document that initiates a civil action. *See* Rule 3 of the  
23 Nevada Rules of Civil Procedure. In accordance with Administrative Order 19-5,  
24 the submitted document is stricken from the record, this case has been closed and  
25 designated as filed in error, and any submitted filing fee has been returned to the  
26 filing party.
- 27 ☐ The document initiated a new civil action and a cover sheet was not submitted as  
28 required by NRS 3.275.

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- ☒ The document was not signed by the submitting party or counsel for said party.
- ☐ The document filed was a court order that did not contain the signature of a judicial officer. In accordance with Administrative Order 19-5, the submitted order has been furnished to the department to which this case is assigned.
- ☐ Motion does not have a hearing designation per Rule 2.20(b). Motions must include designation “Hearing Requested” or “Hearing Not Requested” in the caption of the first page directly below the Case and Department Number.

Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, a nonconforming document may be cured by submitting a conforming document. All documents submitted for this purpose must use filing code “**Conforming Filing – CONFILE**.” Court filing fees will not be assessed for submitting the conforming document. Processing and convenience fees may still apply.

Dated this: 16th day of July, 2021

By:           /s/ Chaunte Pleasant            
Deputy District Court Clerk



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**CERTIFICATE OF SERVICE**

I hereby certify that on July 16, 2021, I concurrently filed and served a copy of the foregoing Clerk’s Notice of Nonconforming Document, on the party that submitted the nonconforming document, via the Eighth Judicial District Court’s Electronic Filing and Service System.

By:           /s/ Chaunte Pleasant            
Deputy District Court Clerk



response) to Plaintiff's complaint.

2. Pay the required filing fee to the court, or file an Application to Proceed *In Forma Pauperis* and request a waiver of the filing fee.

3. Serve (by mail or hand delivery) a copy of your response upon the Plaintiff whose name and address is shown below.

Information and forms to assist you are available, free of charge, at the Civil Law Self-Help Center at the Regional Justice Center, 200 Lewis Avenue, Las Vegas, Nevada, and on the center's website at [www.civillawselfhelpcenter.org](http://www.civillawselfhelpcenter.org).

If you fail to respond, the Plaintiff can request your default. The court can then enter judgment against you for the relief demanded by the Plaintiff in the complaint, which could result in money or property being taken from you or some other relief requested in Plaintiff's complaint.

If you intend to seek an attorney's advice, do it quickly so that your response can be filed on time.

STEVEN D. GRIERSON, CLERK OF COURT

*Laurie Williams*

7/20/2021

By:

Laurie Williams

Date:

Deputy Clerk  
Regional Justice Center  
200 Lewis Avenue  
Las Vegas, Nevada 89153

Issued at the request of:

*Lisa Braslaw*  
(Signature)

Lisa Braslaw

(Your Name)

7050 Shady Palms St. 89131

(Your Street Address)

Las Vegas, NV, 89131

(Your City, State, and Zip Code)

Plaintiff, Self-Represented

*Note: When service is by publication, add a brief summary of the claims asserted, the relief sought, and include any special statutory requirements. This summary should have been proposed through a Motion Seeking Publication and approved through an Order for Service by Publication. See Nevada Rule of Civil Procedure 4-1(e).*

1 **AOS**

2 *(Your Name)*

3 *(Your Mailing Address)*

4 *(Your City, State, Zip Code)*

5 *(Your Telephone Number)*

6 *(Your Fax Number)*

7 *(Your E-mail Address)*

8 Plaintiff, Self-Represented

9 **EIGHTH JUDICIAL DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 *Plaintiff's*  
12 *Name:*

12 Plaintiff,

13 vs.

14 *Defendant's*  
15 *Name:*

15 Defendant.

Case No.: \_\_\_\_\_

Dept. No.: \_\_\_\_\_

16 **AFFIDAVIT/DECLARATION OF SERVICE UNDER PENALTY OF PERJURY**

17 *(Insert name of person performing service)* \_\_\_\_\_, being duly  
18 sworn or under penalty of perjury, states that at all times relevant, I was over 18 years of age and not a  
19 party to or interested in the above-captioned case; that I served a copy of the ☐ Summons, ☐ Complaint,  
20 ☐ Other *(specify)* \_\_\_\_\_ on *(insert date and*  
21 *time you served)* \_\_\_\_\_, 20\_\_\_\_, at the hour of \_\_\_\_\_ M., on Defendant *(insert Defendant's*  
22 *name)* \_\_\_\_\_ by the

22 following method *(complete appropriate paragraph below):*

23 ☐ **Personal service per NRCP 4.2(a)(1):** Delivering and leaving a copy with *(insert*  
24 *Defendant's name)* \_\_\_\_\_ at *(insert address at*  
25 *which you served)* \_\_\_\_\_.

26  
27 *///*  
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☐ **Substitute service per NRCP 4.2(a)(2):** Delivering and leaving a copy with *(insert name or physical description of person served)* \_\_\_\_\_, a person of suitable age and discretion residing at Defendant's dwelling house or usual place of abode, at *(insert Defendant's address)* \_\_\_\_\_.

☐ **Service on a business entity per NRCP 4.2(c)(1)(A):** Delivering and leaving a copy with *(insert name or physical description of person served)* \_\_\_\_\_, who is Defendant's *(check one)* ☐ registered agent, ☐ officer or director, ☐ partner, ☐ member, ☐ manager, ☐ trustee, or ☐ other *(specify)* \_\_\_\_\_, at *(insert address at which you served)* \_\_\_\_\_.

☐ **Other method of service authorized by Nevada statute or court rule:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAW OF THE STATE OF NEVADA THAT THE FOREGOING IS TRUE AND CORRECT.**

**SERVER'S SIGNATURE:** \_\_\_\_\_ **Date:** \_\_\_\_\_

Server's Phone: \_\_\_\_\_

Server's ☐ Residential/ ☐ Business Address: \_\_\_\_\_

☐ I am a licensed process server or an employee of a licensed process server; my license or registration number is *(insert license or registration number):* \_\_\_\_\_.

☐ I am not required to be licensed under chapter 648 of the Nevada Revised Statutes or another provision of law because am not engaged in the business of serving legal process within the State of Nevada.

Job # 14224

## AFFIDAVIT OF DUE DILIGENCE

### Case Info:

#### Plaintiff:

Lisa Breslaw

-versus-

#### Defendant:

Peter Cooper

Eighth Judicial District Court

Court Division: Dept. No.: 3

County of Clark, Nevada

Issuance Date: 7/21/2021 Court Case # A-21-837948-C

### Service Info:

Date Received: 7/21/2021 at 03:18 PM

Service: I Non-Served Peter Cooper

SUMMONS; COMPLAINT

At ( Business / Residence ) UNKNOWN LAS VEGAS, NEVADA 11111

On 7/28/2021 at 02:00 PM

#### Manner of Service:

☒ Non-service: After due search, careful inquiry and diligent attempts at the address(es) listed below, I have been unable to effect the process upon the person/entity being served because of the following reason(s):

☒ Other: Unable to locate a current address for service of court documents.

### Service Comments:

1. On July 21, 2021, Affiant received a request to conduct a skip trace in order to locate a current address for service of Summons and Complaint on Peter Cooper. Affiant was provided information that Peter Cooper was born in Arizona sometime during December 1998.
2. On July 22, 2021, a Database Tracers search for a current address and/or phone number for Peter Cooper found 100 records total, of those there were 3 with DOB of 1998 however none with a December birth month and none in Arizona.
3. On July 26, 2021, Clark County Tax Assessors and Pima County Tax Assessor websites were searched for Peter Cooper, multiple records found, more information needed to narrow search.
4. On July 26, 2021, Nevada Secretary of State, Arizona Secretary of State, Pima County Business License, Clark County Business License, Las Vegas Business License, North Las Vegas Business License and Clark County Fictitious Names was searched for Peter Cooper, multiple records found, more information needed to narrow search.
5. On July 26, 2021, Clark County Detention Center, Nevada Department of Corrections, Arizona Department of Corrections Rehabilitation and Reentry, City of Las Vegas Department of Corrections, Henderson Department of Corrections and The Federal Department of Prisons were searched for Peter Cooper, no records found.
6. On July 26, 2021, Clark County Justice and District Courts, City of Las Vegas Courts, Henderson Courts and Pima County Justice Court were searched for Peter Cooper, multiple records found however only one record was confirmed as the Peter Cooper we are attempting to locate. See Exhibit 1.
7. On July 26, 2021, Clark County Marriage Records, Pima County Records Office and Clark County Recorder's Office were searched for Peter Cooper, multiple records found, more information needed to narrow search.
8. On July 26, 2021, an online search for Peter Cooper found over 100 records, more information needed to narrow search. Affiant found his Reddit account u/Nieuwe\_Sticky\_ and sent him a chat message requesting he contact our office phone number.
9. To date Peter Cooper has not contacted the office regarding the chat message sent to him on his Reddit account.
10. After attempts and efforts of due diligence, Affiant was unable to locate and effectuate service of said documents to Peter Cooper.

I Genice O. Rojas , acknowledge that I am authorized to serve process, in good standing in the jurisdiction wherein the process was served and I have no interest in the above , action. Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

Signature of Server:

Genice O. Rojas

Lic # 2039

LV Process and Investigations, LLC

License #2039

10829 Whipple Crest Ave.

Las Vegas, NV 89166

Phone: (702) 592-3283

Our Job # 14224



Case Number: A-21-837948-C

SUBSCRIBED AND SWORN to before me this 28 day of July 2021 by Genice D. Rojas  
Proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



  
NOTARY PUBLIC for the state of Nevada



# **EXHIBIT 1**



**REGISTER OF ACTIONS**  
**CASE No. A-21-837948-C**

**மாண்புமிகு பேரவைத் தலைவர்:**

**Cross-Reference Case Number: A837948**

<b>Defendant</b>	<b>Cooper, Peter</b>	<b>Lead Attorneys</b>
<b>Plaintiff</b>	<b>Breslaw, Lisa D.</b>	<b>Pro Se</b>

OTHER EVENTS AND HEARINGS		
07/15/2021	<b>Complaint</b>	<b>Doc ID# 1</b>
	<i>[1] Complaint</i>	
07/15/2021	<b>Exhibits</b>	<b>Doc ID# 2</b>
	<i>[2] exhibit1</i>	
07/15/2021	<b>Exhibits</b>	<b>Doc ID# 3</b>
	<i>[3] exhibit2</i>	
07/15/2021	<b>Exhibits</b>	<b>Doc ID# 4</b>
	<i>[4] exhibit3</i>	
07/15/2021	<b>Exhibits</b>	<b>Doc ID# 5</b>
	<i>[5] exhibit4</i>	
07/15/2021	<b>Exhibits</b>	<b>Doc ID# 6</b>
	<i>[6] exhibit5</i>	
07/15/2021	<b>Exhibits</b>	<b>Doc ID# 7</b>
	<i>[7] exhibit6</i>	
07/15/2021	<b>Exhibits</b>	<b>Doc ID# 8</b>
	<i>[8] exhibit7</i>	
07/15/2021	<b>Exhibits</b>	<b>Doc ID# 9</b>
	<i>[9] exhibit8</i>	
07/15/2021	<b>Exhibits</b>	<b>Doc ID# 10</b>
	<i>[10] exhibit9</i>	
07/15/2021	<b>Exhibits</b>	<b>Doc ID# 11</b>
	<i>[11] exhibit10</i>	
07/15/2021	<b>Exhibits</b>	<b>Doc ID# 12</b>
	<i>[12] exhibit11</i>	
07/15/2021	<b>Exhibits</b>	<b>Doc ID# 13</b>
	<i>[13] exhibit12</i>	
07/15/2021	<b>Filing</b>	<b>Doc ID# 14</b>
	<i>[14] exhibit index page</i>	
07/16/2021	<b>Clerk's Notice of Nonconforming Document</b>	<b>Doc ID# 15</b>
	<i>[15] Clerk's Notice of Nonconforming Document</i>	
07/16/2021	<b>Summons Electronically Issued - Service Pending</b>	<b>Doc ID# 16</b>
	<i>[16] conforming summons</i>	

	Petitioner Breslaw, Lisa D.			
	Total Financial Assessment			270.00
	Total Payments and Credits			270.00
	Balance Due as of 07/28/2021			0.00
07/16/2021	Transaction Assessment			270.00
07/16/2021	File Payment	Receipt # 2021-44145-CCCLK	Breslaw, Lisa D.	(270.00)



**MOT**

Lisa Breslaw

(Your Name)

7050 Shady Palms Street

(Your Address)

Las Vegas, NV 89131

(Your City, State, Zip)

702-488-6989

(Your Telephone)

lisa.breslaw@alumni

(Your E-mail Address/Your Fax)

☒ Plaintiff ☐ Defendant ☐ Other: \_\_\_\_\_

Self-Represented

**EIGHTH JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

Lisa Breslaw

Plaintiff(s),

vs.

Peter Cooper

Defendant(s).

Case No.: A-21-837948-C

Dept. No.: 3

**HEARING REQUESTED**

**MOTION**

Motion for Alternative Service

(Insert Title of Motion)

(Check one box) ☒ Plaintiff ☐ Defendant ☐ Other: \_\_\_\_\_, (insert your name)

Lisa Breslaw, self-represented, submits this motion based upon the following Memorandum of Points and Authorities; the pleadings and papers on file in this case; the attached exhibits hereto, if any; and the argument allowed by the Court at the time of hearing.

DATED: (insert date) July 29, 2021.

(Signature) /s/ Lisa Breslaw

(Print your name) Lisa Breslaw

Self-Represented

1                                    **MEMORANDUM OF POINTS AND AUTHORITIES**

2                                    *(Make your points and arguments below.)*

3       The Plaintiff, Lisa Breslaw, moves this honorable court to allow service  
4       of process upon Defendant, Peter Cooper, by alternative  
5       method and for reasons, states:

6       **That on July 20th, 2021, a Writ of Summons was issued**  
7       **in the case of Lisa Breslaw vs. Peter Cooper, Case No.:A-21-837948-C**  
8       **by the Clerk of the 8th Judicial District Court for Clark County, NV, to**  
9       **Peter Cooper (address unknown).**

10       **That Defendant had been living in the United Kingdom**  
11       **from 2009 (at age 10) until around July 3, 2021 (at age 22) when they moved back to the United States.**

12  
13       **That Plaintiff does not know Defendant's last address, phone number,**  
14       **social security number, email address, or exact date of birth. (Plaintiff**  
15       **estimated the year based on Defendant's stated age and**  
16       **only knows that they mentioned a Dec. birthday on social media.) Because**  
17       **Plaintiff had spent their adult life in the UK, this information is not available**  
18       **on US databases.**

19  
20       **That on April 20, 2020, Officer Stephen Robinson of the**  
21       **South Yorkshire Police Dept. emailed Plaintiff stating that he had contacted**  
22       **Defendant Peter Cooper on his/their Facebook account re: their harassment**  
23       **of Plaintiff on Reddit and told them to cease contact with her. (see exhibit 10)**  
24       **Defendant then created an alt. account on Reddit and**  
25       **asked r/LegalAdviceUK whether the police warning was real. In this post they**  
26       **acknowledged creating the libelous SRD post and shared**  
27       **it, thereby confirming that their previous main account,**  
28

1 u/thestickystickman, was indeed them.

2  
3 In that post, Defendant had acknowledged being behind the account u/DovahzulsABadConlang.

4 Defendant soon thereafter posted an update, confirming that the police  
5 warning was real, and described how they verified officer Robinson's identity. (see exhibit 10)

6  
7 Defendant had also laughed at the police warning on his  
8 main account, added the flair "Unironically had the police  
9 called on me because of an SRD post" to his SRD post on  
10 Reddit, and at other points described posting his full  
11 name online, sharing selfies, etc.--thereby further confirming their identity.  
12 (see exhibit8).

13 Defendant had also confirmed that u/DovahzulsABadConlang was him  
14 from that account itself (see exhibit 7).

15  
16  
17 On July 21, 2021, Plaintiff hired process server and owner  
18 of LV Process and Investigations, Genice Rojas, to perform a skip trace  
19 on Defendant. Ms. Rojas was unable to locate Defendant,  
20 and on July 28, 2021, gave Plaintiff an Affidavit of Due Diligence, documenting  
21 her methods of attempting to locate defendant.

22  
23 During this same week, Defendant revealed on their  
24 new Reddit account (u/Nieuwe\_Sticky\_) that they were  
25 picking up their mail at UPS. Therefore, they are probably  
26 not receiving mail at their current address, and this makes  
27 their current address less traceable.

1 Furthermore, based on Defendant's past Reddit activity,  
2 Plaintiff believes Defendant to have a history of frequent moving.

3  
4 Defendant also seems to be fully supported by their parents,  
5 and to Plaintiff's knowledge, does not have any bills in their  
6 name.

7  
8 Given the failed attempts to locate Defendant, Defendant's  
9 Previously UK residence, history of frequent moving, lack of bills  
10 in their name, lack of available information to help locate Defenant,  
11 and the confirmation of Defendant's identity both on social media  
12 and by the South Yorkshire Police, Plaintiff prays that  
13 this honorable Court grant an order allowing service of  
14 process upon Defendant, Peter Cooper, by direct message to their  
15 known and confirmed Reddit account u/DovahzulsABadConlang.

16  
17 Defenant regularly uses this account, and their last activity  
18 on it was on July 28, 2021.

19 Plaintiff has not been able to find Defenant's Facebook  
20 account, and while Plaintiff is sure by the content and time of account creation that  
21 u/Nieuwe\_Sticky\_ is Peter Cooper, DovahzulsABadConlang  
22 has been confirmed to be them. Use of pronoun "them"  
23 is because Defendant now identifies as nonbinary and, to Plaintiff's knowledge, prefers this pronoun.

24 \_\_\_\_\_ (☐ Check if continued on attached pages)  
25 DATED: (insert date) July 29, 2021.

26  
27 (Signature) /s/ Lisa Breslaw

(Print your name) Lisa Breslaw

28 Self-Represented

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**CERTIFICATE OF SERVICE**

Pursuant to Nev. R. Civ. P. 5(b), I HEREBY CERTIFY that on *(insert date of service)*  
**July 28**, 20**21**, I served a true and correct copy of the above **MOTION**  
*(insert name of motion)* **Motion for Alternative Service**

by *(select which method of service you did):*

- ☒ Electronic service via the court's electronic filing system.
- ☐ Hand delivery at the following address *(insert name of opposing party's attorney, or opposing party if unrepresented, and the address where you delivered):*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- ☐ Mailing via United States Mail in the State of Nevada, postage prepaid, to the following address *(insert name of opposing party's attorney, or opposing party if unrepresented, and address where you mailed):*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DATED: *(insert date)* **July 29**, 20**21**.

Name of Person Serving: **Lisa Breslaw**  
Signature of Person Serving: /s/ Lisa Breslaw

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



Lisa Breslaw, Plaintiff(s)  
vs.  
Peter Cooper, Defendant(s)

Case No.: A-21-837948-C  
Department 3

**NOTICE OF HEARING**

Please be advised that the Plaintiff's Motion for Alternative Service of Process in the above-entitled matter is set for hearing as follows:

**Date:** August 31, 2021  
**Time:** 9:00 AM  
**Location:** RJC Courtroom 11C  
Regional Justice Center  
200 Lewis Ave.  
Las Vegas, NV 89101

**NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.**

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Imelda Murrieta  
Deputy Clerk of the Court

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

By: /s/ Imelda Murrieta  
Deputy Clerk of the Court



STATE OF NEVADA )  
 )  
County of Clark )

**AFFIDAVIT OF DUE DILIGENCE**

**Shayla Whitaker**, being first duly sworn on oath deposes and states:

1. That Affiant is a citizen of the United States, over eighteen years of age, employed by Elite Investigations, Nevada Private Investigator's License Number 873, and not a party to, nor interested in the action captioned above.

2. That on August 6, 2021, my employer assigned the Affiant the task of conducting a skip trace in order to locate the last known address for Peter Cooper in order to have him served a Summons and Complaint. The Affiant was provided information that Peter Cooper was born December 1998 in Tucson, Arizona. Additionally, it was disclosed that Peter Cooper recently moved back to the United States from his previous home in the United Kingdom; however, his exact location was unknown.

3. That on August 8, 2021, the Affiant conducted locate research using Peter Cooper's name, date of birth, and city; however, the results of this search did not produce any records within the United States. Another search was conducted using Peter Cooper's name and date of birth within the United States; however, the results of this search did not produce any records. A search was also conducted using the name "Pete" Cooper; however, the results of this search did not produce any records. A search was conducted using only last name Cooper with date of birth. The results of this search produced nine (9) possible records; however, none of the individuals listed had the name Pete or Peter listed as first or middle name, therefore all nine (9) possible individuals were ruled out as possibilities of being the subject. The search results were provided to the client,



with the Affiant informing them that more information was needed in order to complete obtain a current address for Peter Cooper.

4. That on August 9, 2021, the client provided new information that Peter Cooper may be residing at 424 East 57th Street, New York, New York 10022. The Affiant conducted a search for people named Cooper (last name) who have resided at the aforementioned address. The results of this search did not produce any persons named "Peter" or "Pete" (first or middle name), or between the ages of 21-22.

5. That on August 9, 2021, the client also provided Reddit.com user names they believed to be used by Peter Cooper: u/thestickystickman, u/Asticky\_, u/Nieuwe\_Sticky\_, u/All\_Im\_Sticky\_is, and u/DovahzulsABadConlang. It was requested that the Affiant review previous Reddit.com posts and comments from the above user names and engage in discussion in order to obtain a current address from the user. As suggested, it does appear that these users are one and the same person, who is believed to be Peter Cooper.

6. On August 10, 2021, the Affiant created a Reddit.com account in order to complete the client's request. The Affiant was able to locate user name u/Nieuwe\_Sticky\_, and sent a message request to begin conversation. To date, the user has not responded to the message request. Additionally, online database searches were conducted on Facebook, LinkedIn, Twitter, and Google to locate information about Peter Cooper. This search produced over 100 results, none of which could be verified as the subject without more information.


7. On August 11, 2021, the client provided website: <https://www.gofundme.com/f/adamfrog>, which is believed to be the brother of Peter Cooper, and requested that contact be made with the brother in order to obtain a current address for Peter

Cooper. As instructed, the Affiant made an attempt to contact the brother in order to build rapport and eventually attempt to obtain a current address for Peter Cooper. To date, the brother has not responded to the message. The Affiant made additional attempts to chat with Peter Cooper on Reddit.com; however, he has not responded to any comments.

8. That on August 16, 2021, an update was provided to the client that the Affiant has not been successful in locating a current address for Peter Cooper, and that all resources have been exhausted. The client requested that more attempts to contact Peter Cooper on Reddit.com be made. It was agreed that only a few more attempts would be made.


9. That on August 19, 2021, the Affiant provided the client another update, informing them that still no contact had been made with Peter Cooper and that no additional attempts to locate a current address for him would be made at that time.

10. I have read the foregoing Affidavit and know the contents thereof, that the same is true of my own knowledge, except for those matters therein contained upon information and belief and so those matters, I believe them to be true.

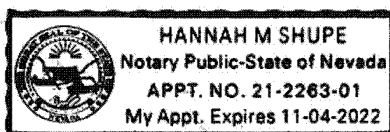
  
Shayla Whitaker

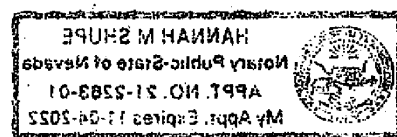
State of Nevada  
County of Clark

SUBSCRIBED AND SWORN to before me this

24<sup>th</sup> day of August, 2021 by Shayla Whitaker 

NOTARY PUBLIC in and for said County and State.





UPDATED EXHIBIT INDEX PAGE (Exhibits to Ex-Parte Motion)



**Exhibit 13**

This is the original post where Peter asks r/LegalAdviceUK whether the police warning was real. Here he confirms that he made the original libelous SRD post and reveals being behind the account u/DovahzulsABadConlang (written in all lowercase in this post).

**Exhibit 14**

Here Peter confirms that he keeps changing usernames. He is well-known on the Reddit sub. DemocratsForDiversity, and after the last private investigator tried interacting with him on his u/Nieuwe\_Sticky\_account, he stopped using it and is now again active on the Asticky\_account.

**Exhibit 15**

Here is one place where the name Peter Cooper is associated with thestickystickman, though this is not the original site I found his name on. He originally had it on his Steam Community Profile, but after the police warning he deleted it and made his social media accounts private.

John Thompson

Everything

Admiration

virtual - Ego

Your month

Received a message

JPG to PDF

reddit.com/r/LegalAdviceUK/comments/g4wlb2/received\_a\_message\_from\_the\_south\_yorkshire/?sort=new

Electronically Filed  
8/30/2021 3:14 PM  
Steven D. Grierson  
CLERK OF THE COURT

LegalAdviceUK

Posts Subreddit Rules Frequently Asked Qs Helpful Resources Tips for New Posters Find a Solicitor

344  
↑  
↓

Posted by u/LegalAdviceUKThrowaway 1 year ago

Civil Issues


Received a message from the South Yorkshire Police informing me about apparent harassment of a woman from Las Vegas on Reddit, what does this mean and what do I do?

UPDATE HERE 21/04/2020

Hi. I'm using an alt for this. I know the information in this story makes me very easily identifiable, but I now know the woman in question follows my main account.

Several months ago, I submitted a post to /r/SubredditDrama about a woman in the US who stalked her professor and made a lengthy series of posts to academic subreddits about it.

About Community

 r/LegalAdviceUK

LegalAdviceUK exists to provide help for those in need of legal support in England, Scotland, Wales and Northern Ireland. We operate as a form of "legal triage" where commenters can guide posters towards resolving issues themselves or towards an appropriate professional.

293k Members2.3k Online

10:56

John Thompson

← → ↻

reddit.com/r/LegalAdviceUK/comments/g4wlb2/received\_a\_message\_from\_the\_south\_yorkshire/?sort=new

Everywhere I Feel

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reddit

r/LegalAdviceUK

Search Reddit

Members

Online

Created Jul 5, 2014

Join

Create Post

COMMUNITY OPTIONS

Several months ago, I submitted a post to /r/SubredditDrama about a woman in the US who stalked her professor and made a lengthy series of posts to academic subreddits about it.

She later found out about the post and said she was going to try to sue me for libel, which some other users alerted me to.

A lot of people who read my post began following her and arguing with her, mostly telling her to get offline and look for professional help. I followed these threads as I wanted to keep an eye on the situation after she claimed she would pursue legal action against me, and I told her under a different account ([/u/dovahzulabadconlang](#)) a couple of times to stop; not more than a few times. After a while, I completely stopped commenting altogether, and just watched her account without interacting.

A couple of months later, she made another post in which people took my side WRT the SubredditDrama post, and she believed I was continuing to contact her and said she hoped I died. I made one comment in response to that - the first time I had interacted with her in a long time - and then, again, went back to not contacting her.

Today, I received a Facebook message from someone claiming to be with the Crime Support Hub for the South Yorkshire Police, which read:

[NAME], We have received an email from a lady in Las Vegas regarding contact you have made with her via the website Reddit. An offence has been recorded on our database for Harassment. She has informed us that you have been following her on the website and sending her messages which she considers to be harassment. Do not contact her again.

r/Le

Diabetics Read This Now Metformin Will Kill Your Kidneys (Stop It Tonight)

1. Le UP

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CLICK HERE



John Thompson

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reddit.com/r/LegalAdviceUK/comments/g4wlb2/received\_a\_message\_from\_the\_south\_yorkshire/?sort=new

reddit

r/LegalAdviceUK

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7. THINGS TO DISRUPTIVE USERS, comments and threads

5. Don't report bad, incorrect or inaccurate advice

6. Do not approach users via PM

7. Referrals, firms and organisations

8. Don't ask or advise how to get away with breaking the law

9. Do not advise people to contact the media

10. No immigration, visa, or citizenship questions

11. Moderator discretion

12. Don't worry about incorrect flairs

Further contact maybe considered as a further course of conduct and consideration will be given whether it is appropriate to take further action against you under the Harassment Act. Thank you, Sheffield Crime Support Hub, South Yorkshire Police

I phoned the local police station and they confirmed that the person who contacted me is an officer in that division who is working from home today, so the message is likely real. I responded to the Facebook message, but haven't gotten a reply, it was after 5 PM, so I imagine the officer is no longer working today.

What do I do about this? What does "An offence has been recorded on our database for Harassment" mean? Is that a publicly available database, like a criminal record? How do I dispute this? What impact does this have on me? What do I do if she claims I contacted her again (which I have not in a long time and will not in the future)?

I'm really concerned about this, any information would be appreciated. Thank you.

**EDIT 21/04/20:** Before making this post, I had responded to the Facebook message asking for a contact number, as advised by my local department. They responded today with a number, which appears to be a real UK number, but I'm not going to call it. As many here have suggested, I've phoned my local station and asked for them to request that the officer send me an email from an official account, which they've said that they have done. I'm currently waiting for that message.

97% Upvoted

105 Comments

Award

Share

Save

Subscribe-Rev

Hide

Report

Use

Diabetics Read This Now

Metformin Will Kill Your Kidneys (Stop It Tonight)

www.usa-people-search.com • 37m

11:37



Electronically Filed  
8/30/2021 3:19 PM  
Steven D. Grier  
CLERK OF THE COURT  
*Steven D. Grier*

John Thompson's Adult Piano x Philannon Fleetwood Mac L x DFD Discussion Thread August x reddit.com/r/DemocratsforDiversity/comments/p97w18/dfd\_discussion\_thread\_august\_22\_2021/h9yv2f2/?context=3

reddit u/Asticky\_ Search Reddit

12 Close

852 Comments Award Share Save Subscribe-Rev Hide Report

Sort By: New (suggested) View all comments Show parent comments

semaphore-1842 · 2h  
Once and Future Queen

How come you keep changing user names

2 Reply Give Award Share Report Save subscribe-rev

Asticky\_ · 2h  
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semaphore-1842 · 2h  
Once and Future Queen

thestickystickman guess who I am

Q All Videos Images News Maps More Tools

Page 2 of about 195,000,000 results (0.41 seconds)

https://www.socialgrip.com > search > query=site:self.in...

site:self.internetdrama - Reddit post and comment search ...

So I was never an Ethan Ralph fan I only watched the Kill Stream when ... here for a day already I'm being bullied I've had it I'm out of here guess I'll go ...

https://bugs.mojang.com > browse

[MC-1413] Slimes are extremely laggy and, when at their largest ...  
Joshua added a comment - 31/Oct/12 7:57 AM ... thestickystickman Peter Cooper added a comment - 01/Nov/12 4:07 AM ... Reporter: thestickystickman ...

People also search for  
guess who i am game online who am i game online  
guess who i am in 20 questions who am i game names list  
guess who i am quiz questions who am i game questions and answers

http://either.io > reddit-or-youtube

Reddit or Youtube | Either

i just dont want to see spacedicks again i was forced to watch it when i was 13 ... Yeah, I guess

*Steven D. Grierson*

CODE CC03

(Insert Name, Bar Number, Address, Phone, Fax, and E-mail of  
Attorney or Party Submitting Subpoena)

Lisa Breslaw  
7050 Shady Palms St.  
Las Vegas, NV 89131  
702-488-6989  
lisa.breslaw@alumni.unlv.edu

- ☐ Attorney for (Name):  
☒ Plaintiff, In Proper Person  
☐ Defendant, In Proper Person

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

Lisa Breslaw

Plaintiff(s)/Petitioner(s),

vs.

Peter Cooper

Defendant(s)/Respondent(s).

Case No.: A-21-837948-C  
Dept. No.: 3

**SUBPOENA DUCES TECUM FOR  
BUSINESS RECORDS**

(No Appearance Required)

THE STATE OF NEVADA TO (insert witness name, address, and telephone number):

The Custodian of Records or Other Qualified Person at

Business/Organization Name: Reddit, Inc.  
Address: Corporation Service Company, 2710  
Telephone No.: Gateway Oaks Drive, Suite 150N, Sacramento, CA,  
94104-5401

**YOU ARE ORDERED**, pursuant to NRCP 45, to produce and permit inspection and  
copying of the books, documents, or tangible things set forth below that are in your possession,  
custody, or control, by one of the following methods (check one):

- ☐ Making the original business records described below available for inspection at your  
business address by the attorney's representative or party appearing in proper person and  
permitting copying at your business address under reasonable conditions during normal  
business hours.
- ☐ Delivering a true, legible, and durable copy of the business records described below to  
the requesting attorney or party appearing in proper person, by United States mail or  
similar delivery service, no later than (insert date production is due) November 12, 2021 at the

1 following address (insert address where production to be delivered): 7050 Shady Palms St.  
2 Las Vegas, NV 89131 or email to lisa.breslaw@unlv.edu

3 All documents shall be produced as they are kept in the usual course of business or shall be  
4 organized and labeled to correspond with the categories listed. NRCP 45(d)(1).

5 **YOU ARE FURTHER ORDERED** to authenticate the business records produced,  
6 pursuant to NRS 52.260, and to provide with your production a completed Certificate of  
7 Custodian of Records in substantially the form attached as Exhibit "B."

8 **CONTEMPT:** Failure by any person without adequate excuse to obey a subpoena  
9 served upon that person may be deemed a contempt of the court, NRCP 45(e), punishable by a  
10 fine not exceeding \$500 and imprisonment not exceeding 25 days, NRS 22.100. Additionally, a  
11 witness disobeying a subpoena shall forfeit to the aggrieved party \$100 and all damages  
12 sustained as a result of the failure to attend, and a warrant may issue for the witness' arrest. NRS  
13 50.195, 50.205, and 22.100(3).

14 Please see the attached Exhibit "A" for information regarding your rights and  
15 responsibilities relating to this Subpoena.

(This Subpoena must be signed by the Clerk of the Court or an attorney.)


16 Steven D. Grierson, CLERK OF COURT

17  
18 By: \_\_\_\_\_ (Signature)  
Deputy Clerk Date:

19 or

20 By: \_\_\_\_\_ (Signature)  
Attorney Name: Date:  
21 Attorney Bar Number:

22 Submitted by:

23  (Signature)  
24 (Insert Name, Bar Number, Address, Phone, Fax, and E-mail of Attorney or Party Submitting Subpoena)

25  
26  
27 ☐ Attorney for (Name):  
28 ☒ Plaintiff, In Proper Person  
☐ Defendant, In Proper Person

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ITEMS TO BE PRODUCED

Basic subscriber information for the following accounts:  
u / thestickystickman  
u / Dovahzuls A Bad Conlang  
u / Asticky

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**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on *(insert date of mailing)* \_\_\_\_\_, 20\_\_\_\_,  
pursuant to NRCP 5(b)(2)(B), I placed a true and correct copy of the foregoing **SUBPOENA  
DUCES TECUM FOR BUSINESS RECORDS** in the United States Mail, with first-class  
postage prepaid, addressed to the following *(insert last known address of opposing attorney or party if unrepresented)*:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DATED: \_\_\_\_\_, 20\_\_\_\_,

\_\_\_\_\_  
\_\_\_\_\_  
*(Signature)*  
*(Print name)*

**AFFIDAVIT/DECLARATION OF SERVICE**

STATE OF NEVADA )  
 ) ss.  
COUNTY OF \_\_\_\_\_ )

I, *(insert name of person making service)* \_\_\_\_\_, being duly sworn, or under penalty of perjury, state that at all times herein I was and am over 18 years of age and not a party to or interested in the proceedings in which this Affidavit/Declaration is made; that I received a copy of the **SUBPOENA DUCES TECUM FOR BUSINESS RECORDS** on *(insert date person making service received Subpoena)* \_\_\_\_\_; and that I served the same on *(insert person making service served Subpoena)* \_\_\_\_\_, by delivering and leaving a copy with *(insert name of witness)* \_\_\_\_\_ *(insert address where witness was served)* at \_\_\_\_\_.

Executed on: \_\_\_\_\_  
*(Date)* *(Signature of Person Making Service)*

**SUBSCRIBED AND SWORN** to before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

**NOTARY PUBLIC** in and for the  
County of \_\_\_\_\_, State of \_\_\_\_\_.

**OR ONE OF THE FOLLOWING: Per NRS 53.045**

(a) If executed in the State of Nevada: "I declare under penalty of perjury that the foregoing is true and correct."

Executed on: \_\_\_\_\_  
*(Date)* *(Signature of Person Making Service)*

(b) If executed outside of the State of Nevada: "I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct."

Executed on: \_\_\_\_\_  
*(Date)* *(Signature of Person Making Service)*

**EXHIBIT "A"**  
**NEVADA RULES OF CIVIL PROCEDURE**

**Rule 45**

**(c) *Protection of persons subject to subpoena.***

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party,

the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

**(d) *Duties in responding to subpoena.***

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.



STATE OF NEVADA                 )  
  ) ss.  
COUNTY OF \_\_\_\_\_ )

Case No.: \_\_\_\_\_

99

*Steven D. Grierson*

**CODE CC03**

(Insert Name, Bar Number, Address, Phone, Fax, and E-mail of  
Attorney or Party Submitting Subpoena)

Lisa Breslaw  
7050 Shady Palms St.  
Las Vegas, NV 89131  
702488-6989  
lisa.breslaw@alumni.unlv.ed

- ☒ Attorney for (Name):  
☐ Plaintiff, In Proper Person  
☐ Defendant, In Proper Person

**EIGHTH JUDICIAL DISTRICT COURT**

**CLARK COUNTY, NEVADA**

Lisa Breslaw

A-21-837948-C

Case No.: \_\_\_\_\_  
Dept. No. **3**

Plaintiff(s)/Petitioner(s),

vs.

Peter Cooper

Defendant(s)/Respondent(s).

**SUBPOENA DUCES TECUM FOR  
BUSINESS RECORDS**

(No Appearance Required)

**THE STATE OF NEVADA TO** (insert witness name, address, and telephone number):

The Custodian of Records or Other Qualified Person at  
Custodian of Records for Reddit, Inc.  
Business/Organization Name: 1455 Market Street, suite 1600,  
Address: San Francisco, CA  
Telephone No.: 94103

**YOU ARE ORDERED**, pursuant to NRCP 45, to produce and permit inspection and copying of the books, documents, or tangible things set forth below that are in your possession, custody, or control, by one of the following methods (check one):

- ☐ Making the original business records described below available for inspection at your business address by the attorney's representative or party appearing in proper person and permitting copying at your business address under reasonable conditions during normal business hours.
- ☒ Delivering a true, legible, and durable copy of the business records described below to the requesting attorney or party appearing in proper person, by United States mail or similar delivery service, no later than (insert date production is due) 11/15/2021 at the

7050 Shady Palms St.

following address *(insert address where production to be delivered)*:  
Las Vegas, NV 89131 or email to lisa.breslaw@alumni.unlv.edu

All documents shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond with the categories listed. NRCP 45(d)(1).

**YOU ARE FURTHER ORDERED** to authenticate the business records produced, pursuant to NRS 52.260, and to provide with your production a completed Certificate of Custodian of Records in substantially the form attached as Exhibit "B."

**CONTEMPT:** Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court, NRCP 45(e), punishable by a fine not exceeding \$500 and imprisonment not exceeding 25 days, NRS 22.100. Additionally, a witness disobeying a subpoena shall forfeit to the aggrieved party \$100 and all damages sustained as a result of the failure to attend, and a warrant may issue for the witness' arrest. NRS 50.195, 50.205, and 22.100(3).

Please see the attached Exhibit "A" for information regarding your rights and responsibilities relating to this Subpoena.

*(This Subpoena must be signed by the Clerk of the Court or an attorney.)*

Steven D. Grierson, CLERK OF COURT

By: \_\_\_\_\_ *(Signature)*  
Deputy Clerk Date:

or

By: \_\_\_\_\_ *(Signature)*  
Attorney Name: Date:  
Attorney Bar Number:

Submitted by:  
/s/ Lisa Breslaw

\_\_\_\_\_  
*(Signature)*  
*(Insert Name, Bar Number, Address, Phone, Fax, and E-mail of Attorney or Party Submitting Subpoena)*

- ☐ Attorney for *(Name)*:  
☐ Plaintiff, In Proper Person  
☐ Defendant, In Proper Person

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**ITEMS TO BE PRODUCED**

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subscriber info. for the following Reddit users:

u/thestickystickman  
u/DovahzulsABadConlang  
u/Asticky\_

Plaintiff believes these accounts to be the same person, Peter Cooper, who libeled and harassed her for over a year on this platform.

u/paintings\_of\_fawns

This was a fake account which Plaintiff believes Peter made for the purpose of harassing her.

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**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on *(insert date of mailing)* \_\_\_\_\_, 20\_\_\_\_, pursuant to NRCP 5(b)(2)(B), I placed a true and correct copy of the foregoing **SUBPOENA DUCES TECUM FOR BUSINESS RECORDS** in the United States Mail, with first-class postage prepaid, addressed to the following *(insert last known address of opposing attorney or party if unrepresented)*:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DATED: \_\_\_\_\_, 20\_\_\_\_,

\_\_\_\_\_  
\_\_\_\_\_  
*(Signature)*  
*(Print name)*

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I, *(insert name of person making service)* \_\_\_\_\_, being duly sworn, or under penalty of perjury, state that at all times herein I was and am over 18 years of age and not a party to or interested in the proceedings in which this Affidavit/Declaration is made; that I received a copy of the **SUBPOENA DUCES TECUM FOR BUSINESS RECORDS** on *(insert date person making service received Subpoena)* \_\_\_\_\_; and that I served the same on *(insert date person making service served Subpoena)* \_\_\_\_\_, by delivering and leaving a copy with *(insert name of witness)* \_\_\_\_\_ *(insert address where witness was served)* at

**SUBSCRIBED AND SWORN** to before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

**OR ONE OF THE FOLLOWING: Per NRS 53.045**

[illegible]

**EXHIBIT "A"**  
**NEVADA RULES OF CIVIL PROCEDURE**

**Rule 45**

**(c) *Protection of persons subject to subpoena.***

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

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(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party,

the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

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(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.





Job # 14224  
*Steven D. Grierson*

## AFFIDAVIT OF SERVICE

### Client Info:

Lisa Breslaw  
Lisa Breslaw  
7050 Shady Palms St.  
Las Vegas, NV 89131

### Case Info:

**Plaintiff:** Lisa Breslaw  
-versus-  
**Defendant:** Peter Cooper  
Eighth Judicial District Court  
Court Division: Dept. No.: 3  
County of Clark, Nevada  
Issuance Date: 7/21/2021 Court Case # **A-21-837948-C**

### Service Info:

**Date Received:** 7/21/2021 at 03:18 PM  
**Service:** I Served **Peter Cooper**  
**With:** **SUMMONS; COMPLAINT**  
by leaving with **Elizabeth Herrmann, SECRETARY**

**At Business ATTORNEY - SAGAR RAICH, ESQ., 6785 S. EASTERN AVE. STE. 5, LAS VEGAS, NV 89119**  
Latitude: 36.067078, Longitude: -115.118801

On 10/27/2021 at 03:25 PM  
**Manner of Service: CORPORATE**

**SERVICE:** was performed by delivering a true copy of this **SUMMONS; COMPLAINT** to: **Elizabeth Herrmann, SECRETARY** at the address of: **Attorney - Sagar Raich, Esq., 6785 S. Eastern Ave. Ste. 5, Las Vegas, NV 89119** with an agent lawfully designated by statute to accept service of process, pursuant to NRS 14.020, a person of suitable age and discretion at the address, which address is the address of the resident agent as shown on the current certificate of designation filed with the Secretary of State or entities usual place of business.

### Served Description: (Approx)

Age: 27, Sex: Female, Race: Asian-Pacific Islander, Height: 5' 5", Weight: 130, Hair: Brown Glasses: No

I **Andraya V. Rojas**, acknowledge that I am authorized to serve process, in good standing in the jurisdiction wherein the process was served and I have no interest in the above, action. Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

Signature of Server: \_\_\_\_\_

**Andraya V. Rojas**  
Lic # **R-2020-02969**  
**LV Process and Investigations, LLC**  
License #2039  
10829 Whipple Crest Ave.  
Las Vegas, NV 89166  
Phone: (702) 592-3283

Our Job # **14224**

SUBSCRIBED AND SWORN to before me this 27 day of October, 2021, by Andraya Rojas.  
Proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



*[Signature]*

NOTARY PUBLIC for the state of Nevada



Case Number: A-21-837948-C



**MDSM**  
Sagar Raich, ESQ.  
NEVADA BAR NO. 13229  
6785 S. Eastern Ave. Ste. 5  
Las Vegas, NV 89119  
Telephone: (702) 758-4240  
Facsimile: (702) 998-6930  
Email: sraich@raichattorneys.com  
Attorney for Defendant, Peter Cooper

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

LISA BRESLAW;  
Plaintiff(s),  
vs.  
PETER COOPER,  
Defendant(s).

Case No.: A-21-837948-C  
Dept. No.: III

**DEFENDANT'S MOTION TO DISMISS**

Defendant PETER COOPER ("COOPER" or "Defendant"), by and through his attorney of record, Sagar Raich, Esq. of Raich Law PLLC, hereby files his motion to dismiss the claim(s) alleged by Plaintiff LISA BRESLAW ("BRESLAW" or "Plaintiff") against said Defendant via Plaintiff's Complaint filed on July 15, 2021, on file herein.

This motion is made and based upon the pleadings and papers on file, the attached memorandum of points and authorities, and any oral argument that the Court may entertain at the time of the Hearing on this matter.

Dated this 2nd day of November, 2021.     /s/ Sagar Raich

SAGAR RAICH  
NEVADA BAR 13229  
RAICH LAW PLLC  
6785 S. Eastern Ave., Suite 5  
Las Vegas, NV 89119  
Attorney for Defendant, Peter Cooper

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1 **II. STANDARD FOR MOTION TO DISMISS**

2 *A. Standard regarding jurisdiction*

3 Nevada Rules of Civil Procedure 12(b)(2) states that a party can request a dismissal by  
4 motion of an opposing party's claims on the basis that the Court lacks jurisdiction over the  
5 requesting party. "To obtain jurisdiction over a non-resident defendant, a plaintiff must show: (1)  
6 that the requirements of the state's long-arm statute have been satisfied, and (2) that due process  
7 is not offended by the exercise of jurisdiction." *Trump v. Eighth Judicial Dist. Court of State of*  
8 *Nev. In and For County of Clark*, 857 P.2d 740, 109 Nev. 687 (Nev., 1993). "First, 'Nevada's  
9 long-arm statute, NRS 14.065, reaches the limits of due process set by the United States  
10 Constitution.'..." *Arbella Mut. Ins. Co. v. Dist. Ct.*, 134 P.3d 710, 122 Nev. 509 (Nev., 2006)  
11 quoting *Baker v. Dist. Ct.*, 116 Nev. 527, 531, 999 P.2d 1020, 1023 (2000). "Second, the Due  
12 Process Clause of the Fourteenth Amendment requires a nonresident defendant to have  
13 'minimum contacts' with the forum state sufficient to ensure that exercising personal jurisdiction  
14 over him would not offend 'traditional notions of fair play and substantial justice'" *Arbella*  
15 quoting *Baker v. Dist. Ct.*, at 531-32, 999 P.2d at 1023 (quoting *Mizner v. Mizner*, 84 Nev. 268,  
16 270, 439 P.2d 679, 680 (1968) (citing *Internat. Shoe Co. v. Washington*, 326 U.S. 310, 316, 66  
17 S.Ct. 154, 90 L.Ed. 95 (1945))). "The defendant must have sufficient contacts with the forum  
18 such that he or she could reasonably anticipate being haled into court there. " *Arbella* quoting  
19 *Trump*, 109 Nev. at 699, 857 P.2d at 748.

20 "A defendant's contacts with a state are sufficient to meet the due process requirement if  
21 either general personal jurisdiction or specific personal jurisdiction exists." *Arbella Mut. Ins. Co.*  
22 *v. Dist. Ct.*, 134 P.3d 710, 122 Nev. 509 (Nev., 2006). "General personal jurisdiction exists when  
23 the defendant's forum state activities are so 'substantial' or 'continuous and systematic' that it is  
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1 considered present in that forum and thus subject to suit there, even though the suit's claims are  
2 unrelated to that forum.” *Id.* Additionally, “with regard to whether specific personal jurisdiction  
3 exists... [a] state may exercise specific personal jurisdiction only where: (1) the defendant  
4 purposefully avails himself of the privilege of serving the market in the forum or of enjoying the  
5 protection of the laws of the forum, or where the defendant purposefully establishes contacts  
6 with the forum state and affirmatively directs conduct toward the forum state, and (2) the cause  
7 of action arises from that purposeful contact with the forum or conduct targeting the forum.  
8 Finally, in determining whether specific personal jurisdiction exists, a court must consider  
9 whether requiring the defendant to appear in the action would be reasonable.” *Id.*

10 *B. Standard regarding failure to state a claim*

11 NRCP 12(b)(5) provides that the request to dismiss a legal action for failure to state a claim  
12 upon which relief can be granted shall be set forth by motion. In reviewing a motion to dismiss,  
13 “[d]ismissal is proper where the allegations are insufficient to establish the elements of a claim for  
14 relief.” *Stockmeier v. Nevada Dept. of Corrections Psychological Review Panel*, 124 Nev. 313,  
15 316, 183 P.3d 133, 135 (2008) (internal quotations omitted).

16 A complaint must allege facts sufficient to establish all the necessary elements of each  
17 cause of action upon which recovery is predicated and, as the Nevada Supreme Court explained,  
18 “if a pleader cannot allege definitely and in good faith the existence of an essential element of his  
19 claim, it is difficult to see why this basic deficiency should not be exposed at the point of minimum  
20 expenditure of time and money by the parties and the court.” *Danning v. Lum's Inc.*, 86 Nev. 868,  
21 869, 478 P.2d 166, 167 (1970).

22 ...

23 ...

1 **III. PERSONAL JURISDICTION IS IMPROPER IN THIS MATTER**

2 As stated previously, for the court to have jurisdiction in this matter, Nevada's long arm  
3 statute must be met and "the defendant must have sufficient contacts with the forum such that he  
4 or she could reasonably anticipate being haled into court there." See *Arbella* at 699.

5 In this matter, Plaintiff's Complaint states in the second allegation that  
6 "Defendant...resided in ...UK at the relevant time herein..." See *Complaint*, Para. 2, on file  
7 herein. As such, Plaintiff admits that Defendant was not residing in Nevada throughout the time  
8 relevant to the Defendant's alleged actions; Defendant had nothing to do with the State of  
9 Nevada throughout the time-period applicable in this matter.

10 Plaintiff thereafter continues to state that the Defendant's alleged acts occurred "over  
11 Reddit," an online platform. *Id.* Nowhere in the Complaint does Plaintiff allege any facts that  
12 would provide a basis for this Court to have jurisdiction over the Defendant. Not one allegation  
13 is made as to the Defendant's contacts with the State of Nevada. Assuming the allegations of the  
14 Complaint as true, it would be impossible for Defendant to be on another continent when the  
15 allegations complained of occurred and be expected to be haled into a Nevada Court. It would in  
16 fact offend traditional notions of fair play and substantial justice to have the Defendant be haled  
17 in to a Nevada court based only on "creat[ing] a post on [Reddit]." See *Complaint*, para 21, on  
18 file herein.

19 Based on the foregoing, it would be inappropriate to have a Defendant that did not meet  
20 minimum contacts with Nevada to be brought into Court here. As such, based on the failure of  
21 the meeting of requirements that are needed prior to the Court exercising personal jurisdiction,  
22 this matter should be dismissed without delay.

23 ...  
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1 **IV. EVEN IF, FOR ARGUMENT’S SAKE, THE PERSONAL JURISDICTION**  
2 **ANALYSIS IS SET ASIDE, PLAINTIFF HAS FAILED TO STATE A CLAIM UPON**  
3 **WHICH RELIEF CAN BE GRANTED**

4 As stated before, “[d]ismissal is proper where the allegations are insufficient to establish  
5 the elements of a claim for relief.” *Stockmeier v. Nevada Dept. of Corrections Psychological*  
6 *Review Panel*, 124 Nev. 313, 316, 183 P.3d 133, 135 (2008) (internal quotations omitted).

7 *A. Plaintiff has failed to state a claim on which relief can be granted for her claim of Libel*  
8 *Per Se*

9 “The general elements of a defamation claim require a plaintiff to prove: ‘(1) a false and  
10 defamatory statement by [a] defendant concerning the plaintiff; (2) an unprivileged publication  
11 to a third person; (3) fault, amounting to at least negligence; and (4) actual or presumed damages.  
12 *Pegasus v. Reno Newspapers. Inc.*, 118 Nev. 706, 718, 57 P.3d 82, 90 (2002).’ ... Statements are  
13 libel per se under Nevada law when they ‘naturally tend to degrade [the plaintiff] in the  
14 estimation of his fellow men, or hold him out to ridicule or scorn, or would tend to injure him in  
15 his business, occupation or profession.’” *Flowers v. Carville*, 292 F. Supp. 2d 1225, 1232 (D.  
16 Nev. 2003), *aff’d*, 161 Fed. Appx. 697 (9th Cir. 2006) (citing *Talbot v. Mack*, 41 Nev. 245, 169  
17 P. 25 (1917)). 2017 Nev. Dist. LEXIS 2013.

18 In this matter, Plaintiff admits that “Plaintiff was venting on Reddit about [her] situation”  
19 and it is clear from Plaintiff’s complaint that her “situation” detailed her dealings with UNLV  
20 and her communications with UNLV and its professors regarding Plaintiff’s own actions. *See*  
21 *Complaint*, para. 4-19, on file herein. Plaintiff then admits that Defendant created a post  
22 regarding her UNLV issues and only after Plaintiff found the post that Defendant made based on  
23 Plaintiff’s posts, did Plaintiff remove her original posts (“Once alerted to the [Defendant’s] post,  
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1 Plaintiff deleted her Reddit posts,” *See Complaint*, para 24, on file herein). Thereafter, Defendant  
2 alleges harassing conduct online and admits that “Plaintiff *suspects* Defendant was behind ...  
3 accounts harassing her...” (emphasis added) *Id.* at para 26.

4  
5 Unfortunately for Plaintiff, her own posts and communications with UNLV and its staff,  
6 provide the basis for Defendant to seek dismissal for failure to state a claim. Plaintiff claims that  
7 “Defendant made false statements of fact against Plaintiff. *See Complaint* at para 40, on file  
8 herein. All of the ‘defamatory’ content, that Plaintiff claims Defendant posted, *came from*  
9 *Plaintiff’s own posts*. There is no way for Defendant to get information other than Plaintiff’s own  
10 posts; the fact that she tried to delete content *she posted* online does not change the fact that she  
11 published the content on which Defendant’s alleged post was based and that the Defendant  
12 restated Plaintiff’s own statements about her fight with UNLV in his alleged post. As alleged,  
13 Defendant took Plaintiff’s own posts as true and reposted them in one summary post – that is not  
14 *Liber per se*.

15 Plaintiff thereafter claims that “Defendant alleged that Plaintiff had committed the crime  
16 of stalking.” *Id.* at para 41. NRS 200.575 defines stalking as “A person who, without lawful  
17 authority, willfully or maliciously engages in a course of conduct directed towards a victim that  
18 would cause a reasonable person under similar circumstances to feel terrorized, frightened,  
19 intimidated, harassed or fearful for his or her immediate safety or the immediate safety of a  
20 family or household member, and that actually causes the victim to feel terrorized, frightened,  
21 intimidated, harassed or fearful for his or her immediate safety or the immediate safety of a  
22 family or household member, commits the crime of stalking.” In this matter Plaintiff admits to a  
23 slew of communications with UNLV wherein Plaintiff harasses UNLV officials, professors, and  
24



1 staff for their failure to work with Plaintiff on her project. Even assuming Plaintiff's allegations  
2 as true regarding 'stalking,' Plaintiff's own complaint provides evidence that she was engaging  
3 in conduct with UNLV that may have had professors and staff felt harassed as required under  
4 NRS 200.575. The complaint admits UNLV even sending Plaintiff a cease and desist letter. *See*  
5 *Complaint*, para. 34, on file herein.

6  
7 Defendant's final allegation regarding Libel per se provides that "Defendant alleged that  
8 Plaintiff demanded collaboration with her professor and then frivolously attempted to have  
9 university administration demoted." *See Complaint*, para. 42, on file herein. Unfortunately for  
10 Plaintiff, she has admitted in other parts of her Complaint that "Plaintiff submitted a proposal..."  
11 and that the professor "declin[ed] to assist [Plaintiff] with the project." *Id.* at para. 4, 8. Plaintiff  
12 thereafter admits to filing "grievances" against such a professor. *Id.* at para 12. As such, Plaintiff,  
13 by her own allegations admits to demanding collaboration with a professor and complaining  
14 against said professor when she was turned down.

15 As explained above, Plaintiff, via her own allegations, has failed to state a claim as  
16 defamation requires the statement to be false - in this matter, the Defendant's alleged statements  
17 were based on Plaintiff's own statements. Plaintiff has failed to state a claim for libel per se as  
18 she did in fact have issues with UNLV officials after her demand for collaboration was not met  
19 leading to UNLV sending her a cease and desist. Truth, based on the Plaintiff's own statements,  
20 causes Plaintiff's complaint to fail to state a claim for defamation.

21 Finally, Plaintiff claims only that "As a result of [Defendant's alleged] statements,  
22 Plaintiff's reputation was damaged." *Id.* at para. 45. Unfortunately for Plaintiff, the standard for  
23

1 libel per se requires “naturally tend to degrade [the plaintiff] in the estimation of his fellow men,  
2 or hold him out to ridicule or scorn, or would tend to injure him in his business, occupation or  
3 profession.” *Flowers v. Carville*, 292 F. Supp. 2d 1225, 1232 (D. Nev. 2003), *aff’d*, 161 Fed.  
4 Appx. 697 (9th Cir. 2006) (citing *Talbot v. Mack*, 41 Nev. 245, 169 P. 25 (1917)). Broad  
5 allegations regarding harm to reputation does not meet the test of the elements required for libel  
6 per se.

7  
8 Based on the foregoing, Defendant requests the dismissal of Plaintiff’s claim of libel per  
9 se for failure to state a claim upon which relief can be granted.

10 *B. Plaintiff has failed to state a claim on which relief can be granted for her claim of*  
11 *intentional infliction of emotional distress*

12 In Nevada, the elements for a claim of intentional infliction of emotional distress are: (1)  
13 that the defendant acts with extreme and outrageous conduct with either the intention of, or  
14 reckless disregard for, causing emotional distress; (2) that the plaintiff suffered severe or extreme  
15 emotional distress; and (3) that the defendant’s conduct is the actual or proximate cause of  
16 plaintiff’s emotional distress. *Switzer v. Rivera*, 174 F. Supp.2d 1097, 1109 (D. Nev. 2001).

17 As examined previously, Plaintiff admits that the Defendant’s post was based on  
18 Plaintiff’s own posts. Thus, Defendant could not have acted with extreme and outrageous  
19 conduct against the Plaintiff for repeating what she said. Similarly, if the Plaintiff suffered severe  
20 or extreme emotional distress from reading about what happened to her, she should not have  
21 posted what happened to her in the first place. Defendant made statements – publically and on a  
22 public forum – and thereafter felt severe and extreme emotional distress when someone allegedly  
23 wrote a post repeating what she had posted?  
24

1 Finally, the elements of intentional infliction of emotional distress require that  
2 “defendant’s conduct [be] the actual or proximate cause of plaintiff’s emotional distress.” *Id.* In  
3 this matter, Plaintiff admits that the alleged post by Defendant was made on December 16, 2019.  
4 *See Complaint*, para. 21, on file herein. Thereafter, “on or around March 16, 2021, Plaintiff was  
5 notified of her rejection from UNR.” *Id.* at para. 38. Thereafter, the Complaint herein was filed  
6 July 15, 2021. While Plaintiff may be frustrated about not getting into UNR, Defendant is not the  
7 proximate cause of her emotional distress – her grief is with UNLV and UNR, not with  
8 Defendant who allegedly just reposted (year and half before the Complaint) content that Plaintiff  
9 herself had posted. Based on the Plaintiff’s own allegations, the emotional distress was caused by  
10 Plaintiff’s fight with UNLV and failing to get into UNR, not by Defendant reposting Plaintiff’s  
11 content.

12 Due to the failure of the Complaint to state a claim for which relief can be granted  
13 regarding the claim of intentional infliction of emotional distress and due to the Plaintiff’s own  
14 allegation making the stating of such a claim to be impossible, Defendant requests that the claim  
15 of intentional infliction of emotional distress be dismissed for failure to state a claim.

16 **V. EVEN IF JURISDICTION IS ASSUMED TO BE ESTABLISHED AND EVEN IF**  
17 **PLAINTIFF CAN SURVIVE THE MOTION TO DISMISS FOR FAILURE TO STATE A**  
18 **CLAIM, DEFENDANT’S CONDUCT, AS ALLEGED, WOULD STILL BE PROTECTED**  
19 **SPEECH UNDER NRS 41.650.**

20 NRS 41.637 states that “Good faith communication in furtherance of the right to petition  
21 or the right to free speech in direct connection with an issue of public concern means any ...  
22 Communication made in direct connection with an issue of public interest in a place open to the  
23 public or in a public forum, which is truthful or is made without knowledge of its falsehood.”

1 NRS 41.650 thereafter provides that “A person who engages in a good faith communication in  
2 furtherance of the right to petition or the right to free speech in direct connection with an issue of  
3 public concern is immune from any civil action for claims based upon the communication.”

4 Plaintiff’s claims derive from Defendant allegedly making a post, repeating Plaintiff’s  
5 own venting online, and alleged comments back-and-forth between the Plaintiff and people  
6 online that Plaintiff guesses to be the Defendant. *See Complaint*, para. 21, 26, on file herein.

7 In this matter, the post was allegedly titled “University Student makes a dumb decision  
8 regarding her professor when applying to grad school, descends over the course of three months  
9 into an obsessive stalker who’s turned an entire faculty against her.” *Id.* at para 21. It is very  
10 clear, based on Plaintiff’s own allegations, that the posts by Plaintiff that Defendant allegedly  
11 repeated, were made regarding a public institution (UNLV) and were about a student who was  
12 arguing with such a public institution and making the arguments public via Reddit (a public  
13 forum). Plaintiff further admits that the alleged post was made on a public forum (Reddit). *Id.* at  
14 para 19-21. Finally, it was not possible for the Defendant to know the falsity of the alleged post  
15 as the post was based on Plaintiff’s own posts (which she admitted to later deleting). *Id.* at para.  
16 24.

17 Even assuming Plaintiff’s allegations as true, Defendant’s post concerned issues of a  
18 public institution (UNLV), such grievances were publically made by Plaintiff herself, the  
19 grievances were made on a public forum, and Defendant could not have known of the falsity of  
20 such statements. Defendant’s statements – as alleged by the Plaintiff – are protected speech and  
21 make the Defendant immune under NRS 41.650, thereby requiring dismissal of the present suit.

22 ...

23 ...

1 **VI. CONCLUSION**

2 To summarize the facts, Plaintiff had issues with a public university, went online to vent  
3 about those issues, and when others started commenting on those issues and posting about them,  
4 did not like such posts/comments. Thereafter, when Plaintiff failed to get into a graduate  
5 program, she decided to take her frustration out on the Defendant by filing this suit.

6 Although Defendant may have sympathy for Plaintiff's tribulations with UNLV and  
7 failure to get in to UNR, Defendant is not the right party in this matter. Plaintiff's own  
8 allegations place the Defendant out of this Court's personal jurisdiction. Plaintiff thereafter failed  
9 to state a claim for libel per se or for intentional infliction of emotional distress. Finally, even if  
10 Plaintiff was to convince the court of personal jurisdiction and have her claims survive,  
11 Defendant's alleged post/comments are free speech protected by Nevada Revised Statutes.

12 Based on the foregoing, Defendant requests the Court to dismiss this matter with  
13 prejudice.

14 Dated this 2<sup>nd</sup> day of November, 2021.

15 /s/ Sagar Raich  
16 SAGAR RAICH, ESQ.  
17 NEVADA BAR 13229  
18 RAICH LAW PLLC  
19 6785 S. Eastern Ave., Suite 5  
20 Las Vegas, NV 89119  
21 Attorney for Defendant, Peter Cooper  
22  
23  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 2, 2021, I served a true and correct copy of the foregoing **Motion to Dismiss** through the electronic filing system of the Eighth Judicial District Court of the State of Nevada, pursuant to Nevada Electronic Filing and Conversion Rules upon the following:

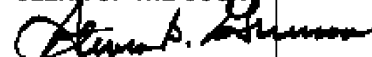
Lisa Breslaw  
7050 Shady Palms Street  
Las Vegas, NV 89131  
Plaintiff

/s/ Sagar Raich  
SAGAR RAICH, ESQ.

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

Electronically Filed  
11/3/2021 7:10 AM  
Steven D. Grierson  
CLERK OF THE COURT



Lisa Breslaw, Plaintiff(s)  
vs.  
Peter Cooper, Defendant(s)

Case No.: A-21-837948-C  
Department 3

**NOTICE OF HEARING**

Please be advised that the Defendant's Motion to Dismiss in the above-entitled matter is set for hearing as follows:

**Date:** January 04, 2022  
**Time:** 9:00 AM  
**Location:** RJC Courtroom 11C  
Regional Justice Center  
200 Lewis Ave.  
Las Vegas, NV 89101

**NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.**

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Marie Kramer  
Deputy Clerk of the Court

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

By: /s/ Marie Kramer  
Deputy Clerk of the Court



Electronically Filed  
11/3/2021 2:52 PM  
Steven D. Grierson  
CLERK OF THE COURT

**EIGHTH JUDICIAL DISTRICT COURT**  
**CLERK OF THE COURT**  
**CIVIL DIVISION**  
REGIONAL JUSTICE CENTER  
200 LEWIS AVE.  
LAS VEGAS, NEVADA 89101

Steven D. Grierson  
Clerk of the Court

Anntoinette Naumec-Miller  
Court Division Administrator

**Filing Fee Remittance**

This form may be used to submit outstanding filing fees to the Eighth Judicial District Court via the Odyssey File & Serve system. By using this method to submit fees you acknowledge that all processing/convenience fees and E-File fees will be assessed in addition to the filing fee(s) as part of this filing transaction.

To submit this form, use filing code **Filing Fee Remittance - FFR (CIV)** and select the applicable fee(s) in the Optional Services section of the envelope.

<b>Case Number:</b>	A-21-837948-C	
<b>Party Responsible for Fees:</b>	Peter Cooper	
<b>Related Filing:</b>	<b>DATE OF FILING</b> 11/02/21	<b>FILING DESCRIPTION</b> MDSM - Motion to Dismiss

Required-filing fees for the above entitled action are submitted as indicated below: *(Please check the applicable boxes and indicate the quantities below).*

	<b>Fee Schedule</b>	<b>Fee Amount</b>
<input type="checkbox"/>	01 Civil Complaint	\$270.00
<input type="checkbox"/>	01BC Business Court Complaint	\$1,530.00
<input type="checkbox"/>	01C Statutory Lien	\$299.00
<input type="checkbox"/>	01CD Constr Defect Complaint	\$520.00
<input type="checkbox"/>	01FM Foreclosure Mediation Petition	\$275.00
<input type="checkbox"/>	01TBC Transfer to Business Court (after civil action)	\$1,260.00
<input type="checkbox"/>	01TPC Third Party Complaint	\$135.00
<input type="checkbox"/>	03 Civil Confession of Judgment	\$28.00



<input type="checkbox"/>	04A Appeals JC/Muni Court	\$47.00
<input type="checkbox"/>	04B Civil Notice of Appeal	\$24.00
<input checked="" type="checkbox"/>	05A Civil Answer/Appear	\$223.00
<input type="checkbox"/>	05BC Business Court Answer/Appear	\$1,483.00
<input type="checkbox"/>	05CD Construction Defect Answer/Appear	\$473.00
<input type="checkbox"/>	05FM Foreclosure Mediation Answer/Appear	\$250.00
<input type="checkbox"/>	05G Answer Additional Party	\$30.00
<input type="checkbox"/>	07A Transfer from another District Court	\$270.00
<input type="checkbox"/>	41 Civil Writ	\$10.00
<input type="checkbox"/>	42 Civil Motion Summary Judg/Joinder	\$200.00
<input type="checkbox"/>	43 Civil Motion Certify/Decertify Class	\$349.00
<input type="checkbox"/>	44 Civil Motion Partial Summary Judg	\$200.00
<input type="checkbox"/>	Civil Peremptory Challenge of Judge	\$450.00

<input type="checkbox"/>	<b>01G Complaint Additional Party</b> Enter additional party names in the spaces below. Please complete additional form if adding more than 10 parties.	\$30.00 (per party)	Quantity: _____	\$ _____
	1			
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**TOTAL PAID:** \$ 223.00



Code 0125  
Lisa Breslaw  
7050 Shady Palms St.  
Las Vegas, NV 89131  
[lisa.breslaw@alumni.unlv.edu](mailto:lisa.breslaw@alumni.unlv.edu)  
Plaintiff, in proper person

**DISTRICT COURT  
CLARK COUNTY, NV**

LISA Breslaw  
Plaintiff

Case No. A-21-837948-C  
Dept. 3

vs

Peter Cooper  
Defendant

Date of Hearing: Jan.4, 2022

Time of Hearing: 9:00 am

**OPPOSITION TO  
Defendant's Motion to Dismiss**

LISA BRESLAW, the Plaintiff in this case opposes the Motion to Dismiss which was filed by PETER COOPER, the defendant in this case, by and through his attorney of record, SAGAR RAICH, esq. of Raich Law PLLC. My opposition is based upon and supported by the following Memorandum of Points of Authorities, the pleadings and papers on file with the Court, the attached declarations and exhibits, and any argument the court may allow at the time of hearing.

**MEMORANDUM OF POINTS AND AUTHORITIES**

I. Jurisdiction

In Defendant's Motion to Dismiss, they claim that this court lacks personal jurisdiction over the matter because Defendant resided in the UK when he first made his libelous post and that it would be "unfair to traditional notions of fair play and substantial justice to have Defendant haled into a NV court based only on a Reddit post."

First, to say that Defendant is being "haled into court only over a Reddit post" is an egregious misrepresentation of the facts. Defendant maliciously accused Plaintiff of stalking her

retired professor after trying to force her to collaborate on a project with her. They also accused Plaintiff of frivolously trying to have UNLV administration demoted.

Even though Defendant resided in the UK when they first made their libelous post, the Effects Doctrine asserts that “activities abroad, even those of foreign citizens, may be regulated because of their impact on interest within the territorial state’s domains.” (International Law Association Report on the Fifty First Conference, 369 [Tokyo Report]) The injuries and damages caused by Defendant’s libelous post and harassment were felt by a NV resident while being physically present in NV, and this not only includes emotional damages but the financial damage caused by being rejected from UNR, a public university in NV, because of Defendant’s libelous post. Additionally, implicit in Defendant’s allegation that Plaintiff stalked her retired professor was that UNLV allowed an employee to be stalked. Therefore, Defendant’s post impacted interests within NV not only because of Plaintiff’s injuries but because of its negative and potentially financially damaging impact on UNLV.

Additionally, Defendant knew that Plaintiff resided in NV at the time these torts (both the libelous post and the subsequent harassment) occurred. For example, Plaintiff’s Reddit username was Gemini725, and other Reddit users quickly realized that 725 was a NV area code. This was evident by multiple troll accounts appearing with the professor’s and other UNLV faculty members’ names in them. Defendant responded to at least one of these accounts and may have been behind others. Plaintiff has subpoenaed Reddit for the identity/subscriber information for one such troll account that she suspects to be Defendant, as well as for the subscriber information for u/thestickystickman and u/DovahzulsABadConlang, the accounts Defendant has acknowledged were theirs (see subpoena duces tecum for business records in case file). Plaintiff is still awaiting these records at the time of this opposition.(See Exhibit 16, proof of service Civil Subpoena) However, given how closely Defendant followed Plaintiff’s Reddit account, they were, at a minimum, aware of Plaintiff’s and UNLV’s location when the relevant torts occurred. The “725” is, thus, equivalent to a “geographically focused hashtag or tagging” marker in which social media contacts alone justify personal jurisdiction over a nonresident. (Vangheluwe, 365 F. Supp 3d at 857)

Moreover, on April 20, 2020, Defendant created a post on r/LegalAdviceUK titled “Received a message from the South Yorkshire Police informing me about apparent harassment of a woman from Las Vegas on Reddit, what does this mean for me and what do I do?” In this same post, they shared their libelous SRD post (see exhibit 13 in case file). Thus, even if, for argument’s sake, Defendant did not know of Plaintiff’s location/university prior to this date, they did afterwards and continued sharing the post and harassing Plaintiff--despite a police warning to stop (see exhibits 8, 9, and 10 in case file). Furthermore, the fact that the South Yorkshire Police could not prosecute Defendant for harassment and malicious communications because Plaintiff resided in the US further establishes NV jurisdiction. Thus, given these facts, and in accordance with NRS 14.065, the cause of action arose from Defendant’s purposeful contact with and conduct deliberately targeting the forum.

In *Calder vs. Jones*, the Court listed the following three relevant facts in determining that California, the plaintiff's state, had personal jurisdiction over the case: First, the article in question "concerned the California activities of a California resident. Second, the article (written in Florida) was drawn from California sources. Third, the brunt of the harm, both in terms of respondent's emotional damages and the injury to her professional reputation, was suffered in California." (*Calder*, US, at 783, *Id.* 788-789) This is similar to this case where Defendant's article/post concerned the Nevada activities of a NV resident, drawn from NV sources (as Defendant's attorney stated in his motion to dismiss, he believes Plaintiff's posts were the basis of the SRD post), and the brunt of the harm, both in terms of respondent's emotional damages and the injury to her professional reputation, was suffered in NV. Therefore, Defendant could "reasonably be expected to anticipate being haled into a NV court,' especially since he saw a post where Plaintiff inquired about suing him. He responded, "Gemini, it's time to stop." (See exhibit 8).

There is also the issue of how Debra Pieruschka, UNLV's Assistant General Counsel came across the SRD post and Plaintiff's (deleted) Reddit posts. First, this is further damage in NV, since the people whom Plaintiff least wanted to see her posts, the SRD post, and the harassment she was experiencing (those whom it would bring her the most embarrassment to learn that they've seen this Reddit activity) all resided in and/or had substantial contact with NV (i.e. being connected to UNLV). There is a possibility that Defendant contacted UNLV or the professor or one of the faculty members in questions, but this will require subpoenaing records/witnesses, as UNLV will not provide Plaintiff with this information. It must also be considered that Plaintiff is not on good terms with UNLV and they may not want to cooperate with her in this lawsuit. Even if Defendant did not directly contact UNLV, however, NV would still have jurisdiction over him based on all the other circumstances and facts.

Finally, in accessing the reasonableness of jurisdiction, it must be considered that Defendant has moved across multiple jurisdictions from the time they created the libelous post until time of service with the complaint. When they first published this post, for example, they were in Sheffield, UK but shortly after Plaintiff learned their identity and location, they moved to Reading, UK. Then, not long after moving to Reading, they were posting about moving back to the US. According to Peter's parents' Facebook pages, the family had moved to Boston (see exhibit 17). Defendant had mentioned living with his parents' when he first moved back to the US (presumably in Boston), but then moved two more times, according to their own Reddit posts (now deleted). According to Peter's grandfather, Roger Cooper, Peter is now living on campus at the University of Colorado Boulder (This can be verified with process server, Genice Rojas.) Given how recently he moved there, it is unlikely that he has in-state residency. Finally, even if he is considered a resident of Colorado, he neither lived there when the torts occurred, nor were the blunt of Plaintiff's injuries felt there. (They were felt in NV.) Moreover, Defendant does not have the financial or psychological constraints on travel that Plaintiff has. Therefore, given the arguments above, personal jurisdiction in NV is proper in NV.

## II. Claims for Relief

#### A. Libel Per Se

In their Motion to Dismiss, Defendant and their attorney state that in order for a statement to be considered libel per se in NV, it must “degrade [the plaintiff] in the estimation of his fellow men, or hold him out to ridicule or scorn, or would tend to injure him in his profession or business, occupation, or profession.” Being accused of stalking a retired professor tends to have these effects, and the ridicule and scorn is evident from the comments on Plaintiff’s Reddit posts on and after the SRD post, as well as those made about her.

The fact that Plaintiff was rejected from a program that she was well-qualified for academically (based on the program’s admissions standards) is another indication that she was “degraded in the estimation of her fellow men [i.e., in the academic community] and suffered damages to her “business, occupation, or profession.” Another such indication is that a UNR professor that Plaintiff contacted about becoming her graduate advisor, Dr. Emily Hobson, is refusing to speak to her. Not wanting to risk being charged with harassment, Plaintiff has not emailed Dr. Hobson to follow-up. However, given the popularity of Defendant’s post and the rumors it has spawned, it is not unreasonable to believe that Plaintiff now has a reputation as being a “stalker” and difficult to work with.

Next, Plaintiff argues that Defendant indeed knew that his statements were false because, while Plaintiff created posts about conflicts with UNLV, she never mentioned stalking the professor, trying to have the Dean demoted (she does admit to trying to have the Chair demoted, but it was for good cause), and contrary to Defendant’s assertions, did not demand collaboration with her professor on the project. Dr. Gallo’s stated reason for declining to assist with the project was that Plaintiff lacked the proper background and preparation to present this project at an oral history conference. So, Plaintiff withdrew her proposal from the conference. Thus, when Dr. Gallo still did not respond to her afterward; Plaintiff felt upset by Dr. Gallo’s seeming change in attitude toward her, and that is why she filed the complaint. It was not for Dr. Gallo’s declining to help with the project per se. (UNLV has records of these emails.)

Furthermore, Plaintiff did not “admit to a slew of communications with UNLV where she admits to harassing UNLV officials, professors and staff for their failure to work with Plaintiff on her project.” As stated in her complaint, Plaintiff was trying to retract the grievance against Dr. Gallo because she admired her and did not want her to suffer any negative repercussions over what may have been an email miscommunication. Retracting a grievance and wanting to apologize for it would not cause a reasonable person to “feel terrorized, frightened, intimidated, harassed or fearful for his or her immediate safety or the immediate safety of a family or household member.” Therefore, Plaintiff’s actions did not meet the criteria for stalking under NRS 200.575. Also, nowhere in her complaint against Defendant did Plaintiff state that the faculty/university failure to help with this project was the reason for these communications with the university.

Plaintiff is attaching the (now archived) Reddit posts that Defendant shared in the subreddit drama post (see exhibit 18). Plaintiff’s posts express anguish over falling out with Dr.

Gallo, profound admiration for her, and frustration with UNLV administration for their negligence and dishonesty, but again, nowhere does she confirm Defendant's allegations. She did make one post asking r/legaladvice "Would this be considered Stalking?" but she made this post specifically because, as much as she wanted to rectify the situation, she did not want to cross into any illegal activity. Also, most of the answers on that post were that contacting a professional acquaintance to convey a message would not be considered stalking or harassment (but that it would be unlikely to lead to reconciliation Dr. Gallo). There were a couple of troll accounts (accounts who only responded to my posts) who said it would be stalking, but Plaintiff did not end up reaching out to that person (that she had in mind to contact). Defendant, however, deliberately misconstrued this post and the responses to try to convince readers of the SRD post that Plaintiff was stalking Dr. Gallo.

Next, despite Plaintiff specifying that Dr. Gallo had not yet retired, Defendant wrote, "...it descends from a student making a misstep due to poor judgment and anxiety down to OP stalking her retired professor with whom she has become completely obsessed." He further wrote "...the retired professor keeps ignoring all her messages, but she just keeps trying to get in touch. She even asks legal advice if this is stalking, they say yes, and she continues to try to contact this poor woman she tried (and failed miserably) to ruin the career of for no reason." This is explicitly alleging that Plaintiff "sent her professor [many] messages," which was untrue. As stated in the complaint, the cease and desist letter was not for directly Contacting Dr. Gallo.(see exhibit 19) Although the letter mentions harassment, as stated in the complaint, it was for contacting administration to have the grievance retracted, not for messaging Dr. Gallo. Defendant, however, deliberately created a false and libelous narrative. Also, Plaintiff had not received the cease and desist letter at the time of Defendant's SRD post.

## B Emotional Distress

Plaintiff also argues that Defendant was indeed the proximate cause of her emotional distress. While she has acknowledged experiencing conflict with UNLV, that did not subject her to the public humiliation, ridicule, and harassment that Defendant's post did. Also, even if UNLV administration felt harassed by her efforts to retract the grievance, that's a far cry from stalking a retired professor. Moreover, Defendant did not merely "repeat what Plaintiff had said" but used innocuous posts that Plaintiff had made (and deleted) to support a false and libelous narrative that has harmed Plaintiff's reputation, jeopardized her career, and subjected her to significant harassment (from both the public and Defendant).

Next, in the post itself, Defendant stated that he originally shared it as a "TL;DR in another sub, but "wanted to share it here (on SRD) because it's honestly an insane story..." Thus, he acknowledges that sharing it on a smaller/less popular sub was not enough for him; he wanted this story to go viral and wanted to humiliate, defame, and incite harassment against Plaintiff. This is also evidenced by the fact that, even after sharing this post on subredditdrama, he continued sharing it across Reddit, wanting it to reach as many people as possible--and

again, this was after Plaintiff had deleted her posts. This behavior is extreme and outrageous, and indicates intention to inflict emotional distress--especially given that Plaintiff had mentioned having an anxiety disorder.

Defendant and their attorney point out that Plaintiff deleted her Reddit posts after finding out about the libelous SRD post. However, one of the reasons she deleted them was to avoid becoming, in Defendant's own words, "a huge spectacle" (see exhibit 20). Regardless of the reason(s) she deleted them, however, the fact that Defendant went out of his way to retrieve deleted posts (for the purpose of exposing them and creating a libelous narrative) shows intention to inflict emotional distress. Defendant also failed to address the fact that they knew Plaintiff had anxiety issues and would be particularly sensitive to/affected by the level of harassment that such a post could and did expose Plaintiff to.

It was also humiliating for Plaintiff to learn (through Debra Pieruschka, UNLV's asst. Gen. counsel) that faculty and administration at UNLV had seen her Reddit account, and may have witnessed the harassment. As stated in the complaint, Plaintiff feels that she can never have a dignified professional image because of that post. Even if she was admitted to a graduate program (which will be difficult with a reputation for stalking a professor, etc.) and went on to an academic career, future students and colleagues (at any job) could access that post. There's also the fact that the people she admires most, not only Dr. Gallo, but other academics whom she likes and respects (i.e. the professors who wrote her letters of recommendation to graduate school) could have seen the post, the harassment, and the Plaintiff in a vulnerable state. Again, she is easily recognizable from the identifying facts presented in the post (i.e. age of university attendance, specific personality traits, the paper mentioned, wanting to retract the grievance etc.)

Regarding the claim that Plaintiff only *suspects* (emphasis Defendant's) Defendant of being behind the harassing accounts, again, records from Reddit have been subpoenaed and Plaintiff is waiting to receive them. Furthermore, Defendant has admitted to being behind the u/thestickystickman account (creator of the libelous post) and uDovahzulsABadConlang. They have also accepted service of Plaintiff's complaint and have, according to the contents of Motion to Dismiss, admitted to creating the post in question and participating in at least some of this harassment (see exhibit 8).

It was not only the post itself that caused Plaintiff emotional distress, however. She was also being mocked by Defendant over her anxiety disorder. For example, he would sometimes feign distress over professors ignoring his emails etc. He also engaged in a "skit" in the SRD post comment section, where someone said "Great post, A-" and he replied "That's so rude; I'm messaging the mods about this." (see exhibit 8) He also continuously referred to Plaintiff as a "stalker" or a "mentally unstable stalker" etc. The duration of his harassment (almost 2 years) makes this behavior "extreme and outrageous," not to mention that he incited thousands of others to engage in similar harassment against Plaintiff.

Finally, Defendant themselves has admitted to “bullying” Plaintiff and causing her “pain and harassment.” They should not be taken at their word, however, that they didn’t know who the professor was or which state this was in for the reasons argued above ( where Plaintiff addressed jurisdiction). Again, at a minimum, he was aware of the forum once the police told him that Plaintiff resided in Las Vegas, and he continued sharing his post and harassing Plaintiff (even when she stopped using Reddit).

### Protected Speech

Defendant did not engage in “good faith communication.” Again, they maliciously used innocuous posts that Plaintiff had made to create a false and libelous narrative which resulted in the damages mentioned above and in her complaint. Therefore, Defendant’s libelous SRD post and subsequent harassing communications are not protected speech under NRS 41.650.

Furthermore, Plaintiff is not a public figure, and she ultimately deleted the posts that Defendant retrieved. Nevada’s Senate Bill (No. 220) Prohibits “the operator of an Internet website or online service which collects certain information from consumers in this State from making any sale of certain information about a consumer if so directed by the consumer; and providing other matters properly relating thereto.” Although the law does not specifically apply to social media, it demonstrates the right for internet users to control information shared about them. Likewise, the 4th amendment of the United States Constitution gives Americans the right to privacy, and this includes the right to make private information that was once made public (such as deleting a post or changing one’s privacy settings on social media etc). Defendant themselves has since deleted embarrassing/personal posts that they had shared on Reddit, although they did not have the misfortune of someone making them go viral.

The next issue is defining what constitutes a matter of “public interest.” *In Pope vs. Fellhauer* (Pope vs. Fellhauer, No. 74438) the Court adopted the following standards as outlined by California:

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, and matter of concern to a speaker and a relatively small audience is not a matter of public interest. For example, a student’s issue/dispute with a professor is not a matter of public interest. In fact, when Plaintiff tried contacting the media about UNLV’s mishandling of the matter, they turned down the story; therefore it was not deemed 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. Even if this Court presumes that the grievance mishandling by UNLV (as alleged by Plaintiff) is a matter of public interest, her anxiety disorder and feelings for her former professor are not.



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 converty 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.

Even if this Court determines that Plaintiff's Reddit posts constituted a public interest, however, maliciously accusing someone of a committing a crime (in this case stalking a retired professor) and making up stories about them engaging in unprofessional behavior which could damage their career (such as trying to force a professor to collaborate on a project and then frivolously trying to have university administration demoted) is not protected speech.

### Conclusion

In summary, Defendant deliberately used innocuous posts that Plaintiff had made (and deleted) to support their false and libelous narrative that Plaintiff had stalked her "retired" professor, demanded collaboration with her on a project, and frivolously tried to have university administration demoted. This post caused substantial harm to Plaintiff's reputation and damaged her educational and career prospects. Defendant also made fun of her anxiety disorder in this post, and, by his own admittance, "bullied" her and caused her "pain and harassment." This behavior continued for over a year, where Defendant not only mocked and harassed Plaintiff but continued sharing their libelous post--which they left up even after deleting their former main account (u/thestickystickman) and acknowledging that it was wrong of them to make the post in the first place.

Plaintiff suffered severe emotional distress because of Defendant's behavior (including inciting others to harass her) which included humiliation and increased anxiety symptoms. This distress did not stem from her issues with UNLV but from the Defendant's conduct; thus, they are the proximate cause of it. For the reasons stated above (under "emotional distress"), Defendant's behavior meets the standards of "extreme and outrageous conduct," and the fact that they retrieved deleted posts to support his story and shared the story on increasingly popular subs, assuring that it went viral, shows intention to cause distress--not to mention that they engaged in this behavior knowing that Plaintiff had an anxiety disorder.

Next, the Effects Doctrine, combined with the fact that Defendant knew that Plaintiff was in NV when he made/continued sharing his posts, that Plaintiff felt the brunt of the damages in NV, and that his story was drawn from NV sources (Plaintiff's posts) further establishes jurisdiction, as they purposely made contact with and targeted NV, the forum state. This is especially true since the allegations in Defendant's post impact interest in NV (i.e. by people believing that UNLV allowed employees to be stalked). There's also the possibility that they contacted UNLV about Plaintiff's Reddit activity and/or some of their faculty members, though determining this

will likely have to involve subpoenaing UNLV's legal representatives to give testimony and/or subpoenaing their records. Even if he did not contact them, however, the rest of Plaintiff's arguments would still give NV jurisdiction in the matter. This includes the "reasonableness factor" in establishing jurisdiction; Defendant frequently moves between jurisdictions and does not have Plaintiff's economic constraint or fear of flying etc.

Plaintiff also contests Defendant's assertion that their posts are a matter of public interest. However, even if they were, falsely accusing someone of stalking a retired professor, trying to force said professor to collaborate with them, and frivolously having university employees demoted is not protected speech.

For the reasons stated above, the Court should deny the pending motion.

Dated this 3rd day of November, 2021.

I declare under penalty of perjury under the law of the state of NV that the foregoing is true and correct.

/s/Lisa Breslaw

Lisa Breslaw  
Plaintiff, In Proper Person

### **Certification of Service**

I hereby certify that on November, 3rd, 2021, I served the above OPPOSITION TO MOTION TO DISMISS (and its exhibits), to PETER COOPER through SAGAR RAICH, esq. of Raich Law, attorney for defendant, pursuant to NRCP 5(b) through the electronic filing system of the Eighth Judicial District Court of the State of Nevada pursuant to Nevada Electronic Filing and Conversion Rules upon the following:

Peter Cooper  
Sagar Raich (NV BAR NO. 13229)  
6785 S. Eastern Avenue Ste. 5  
Las Vegas, NV 89119  
Defendant and Defendant's Attorney

Dated this 3rd day of November, 2021

/s/ Lisa Breslaw

---

7050 Shady Palms St.  
Las Vegas, NV 89131  
Plaintiff, In Proper Person

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

/s/Lisa Breslaw  
Lisa Breslaw

### **DECLARATION**

STATE OF NV)

)ss.

COUNTY OF CLARK)

Declarant, LISA BRESLAW, swears and affirms under penalty of perjury, that the following assertions are true and correct:

- 1) Declarant submits this declaration in support of the Opposition to Motion to Dismiss filed by Peter Cooper through his attorney, Sagar Raich, Esq., the Defendant and Defendant's attorney.
- 2) Declarant is competent to be a witness to the matters stated in this declaration, and could and would testify to those matters in a court of law, under oath, subject to the penalty of perjury.
- 3) Declarant has personal knowledge of the facts and circumstances set forth below gained through being the Plaintiff and personally experiencing the facts and circumstances in this case as they were versus how Defendant presented them.
- 4) Based on Declarant's personal knowledge, Declarant states as follows:
  - A. That she presented strong evidence of the court having personal jurisdiction in this matter
  - B. That she did not stalk her former professor, Dr. Marcia Gallo
  - C. That she did not demand that Dr. Gallo collaborate with her on her oral history (or any) project and did not file her complaint for Dr. Gallo's lack of collaboration on said project.
  - D. That she did not harass UNLV officials, professors, or staff over their failure to assist with her project.
  - E. That, to her knowledge, she did not specifically request that Dean Jennifer Keene be demoted from her position as Dean of UNLV's Liberal Arts Colleges. Declarant, however, acknowledges complaints against UNLV, in which Dean Keene was mentioned, but Declarant did not request that she be demoted.
  - F. That she felt harassed bullied by Defendant

- G. That she experienced the emotional distress detailed in her complaint
- H. That she believes the Defendant to be the proximate cause of this distress.

Dated this 3rd of November, 2021

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct, per NRS 53.045.

/s/ Lisa Breslaw

Lisa Breslaw, Plaintiff in Proper Person



EXHIBIT INDEX PAGE TO OPPOSITION TO  
MOTION TO DISMISS

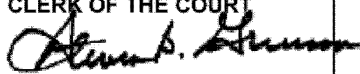
Exhibit 16. Proof of Service that Reddit was served with a subpoena for records.

Exhibit 17. A screenshot of Courtney Cooper's Facebook page, showing that the family had originally moved to Boston when they first returned to the US. Peter then, according to his grandfather, moved to Colorado to attend the University of Colorado Boulder. The purpose of this exhibit is to show that Defendant has moved across multiple jurisdictions and that it would be unreasonable to establish jurisdiction outside NV (aside from all the other arguments presented as to why personal jurisdiction in NV is proper).

Exhibit 18. Archived Reddit posts by Plaintiff which Defendant had shared on SRD.

Exhibit 19. The Cease and Desist Letter that UNLV sent Plaintiff. There was no mention of stalking anywhere in the letter.

Exhibit 20. Defendant admits that it was "wrong" of him to make his post, that he made Plaintiff a "huge spectacle," and that he "bullied" her and caused her "pain and harassment."

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address) <b>Lisa Breslaw</b> <b>7050 Shady Palms St.</b> <b>Las Vegas, NV 89131</b> ATTORNEY FOR <b>Plaintiff</b>		TELEPHONE NUMBER <b>(702) 488-6989</b>	Electronically Filed 11/12/2021 4:45 PM ONLY Steven D. Grierson CLERK OF THE COURT 
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO - CENTRAL 400 McAllister St San Francisco, CA 94102			
SHORT TITLE OF CASE Breslaw, Lisa v. Cooper, Peter			
DATE <b>11/12/2021</b>	TIME <b>4:45 PM</b>	DEP./DIV.	CASE NUMBER: <b>A-21-837948-C</b>
<b>Proof of Service Civil Subpoena</b>			Ref. No. or File No: Peter Cooper

**FILE BY FAX**

1. I served this **Subpoena For Production of Business Records in Action Pending Outside California; Application For Discovery Subpoena in Action Pending Outside California; Subpoena Duces Tecum for Business Records** by personally delivering a copy to the person served as follows:

- a. Person served (name): **Custodian of Records, Reddit, Inc. - Nicole Stauss**  
**Authorized Agent for Service of Process**
- b. Address where served: **2710 Gateway Oaks Dr, Suite #150N, Sacramento, CA 95833**
- c. Date of delivery: **10/21/2021**
- d. Time of delivery: **01:36 PM**

e. Witness fees (check one):

(1) ☒ were offered or demanded  
 and paid, Amount: ..... **\$ 15.00**

(2) ☐ were not demanded or paid.

f. Fee for service: ..... **\$ 90.00**

2. Person attempting service:

- a. Name: **Jason W. Marshall**
- b. Address: **D&R Legal Process Service, LLC. 39159 Paseo Padre Pkwy. # 112, Fremont, CA 94538**
- c. Telephone number: **510-797-9996**
- d. I am a: California Registered Process Server
  - (i) ☒ **Independent Contractor**
  - (ii) Registration No.: **98-61**
  - (iii) County: **Sacramento**

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



Jason W. Marshall

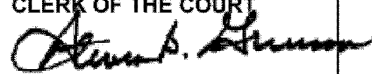
Date: 10/26/2021

Proof of Service Civil Subpoena

Invoice #: 5074996-02





ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address) <b>Lisa Breslaw</b> <b>7050 Shady Palms St.</b> <b>Las Vegas, NV 89131</b> ATTORNEY FOR <b>Plaintiff</b>		TELEPHONE NUMBER <b>(702) 488-6989</b>	Electronically Filed 11/19/2021 10:41 PM ONLY Steven D. Grierson CLERK OF THE COURT 
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO - CENTRAL 400 McAllister St San Francisco, CA 94102			
SHORT TITLE OF CASE Breslaw, Lisa v. Cooper, Peter			
DATE <b>11/12/2021</b>	TIME <b>4:45 PM</b>	DEP./DIV.	CASE NUMBER: <b>A-21-837948-C</b>
<b>Proof of Service Civil Subpoena</b>			Ref. No. or File No: Peter Cooper

**FILE BY FAX**

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(1) ☒ were offered or demanded  
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  - (ii) Registration No.: **98-61**
  - (iii) County: **Sacramento**

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



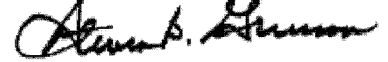
Jason W. Marshall

Date: 10/26/2021

Proof of Service Civil Subpoena

Invoice #: 5074996-02





UNIVERSITY OF NEVADA, LAS VEGAS

February 5, 2020

Email – breslaw@unlv.nevada.edu

Lisa Breslaw  
Las Vegas, NV

**Re: CEASE AND DESIST – HARASSING CONDUCT**

Dear Ms. Breslaw:

As previously advised, this office represents the Board of Regents of the Nevada System of Higher Education, on behalf of the University of Nevada, Las Vegas ("UNLV"). Our records indicate you are a former UNLV undergraduate student, not currently enrolled at UNLV. The purpose of this letter is to address your ongoing harassing behavior with the University. Contrary to its request, you continue to send numerous unwarranted and harassing communications to faculty and staff at UNLV. It has been reported by multiple offices that you are continuing your onslaught of emails and telephone calls regarding an issue involving Drs. Kirk and/or Gallo that the University considers closed. Your persistent actions have caused our employees to feel harassed and attacked.

As such, demand is hereby made upon you to immediately cease and desist from the persistent, unwarranted, and harassing emails and telephone calls to the University and/or its employees related to your issues with Dr. Gallo, Dr. Kirk, and the History Department. Should UNLV learn of your continued unwarranted, harassing, false and misleading misrepresentations, it will have no alternative but to pursue any and all available administrative, legal, and equitable remedies against you. However, should you need to communicate with the University, you are to direct any such inquiries to my attention. I will submit your questions to the appropriate individual for handling.

This letter is not intended as, and may not be construed to be, a complete recitation of the facts and circumstances surrounding this matter. UNLV expressly reserves its right to pursue any and all available legal and equitable remedies against you without further notice. This letter shall not constitute a waiver of any of UNLV's rights or remedies. Your response within ten (10) days of the date of this correspondence is requested.

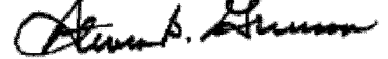
Sincerely,



DEBRA L. PIERUSCHKA, ESQ.  
Assistant General Counsel

DLP:svp

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11/4/2021 5:47 PM  
Steven D. Grierson  
CLERK OF THE COURT



Lisa Breslaw  
7050 Shady Palms St.  
Las Vegas, NV 89131  
[lisa.breslaw@alumni.unlv.edu](mailto:lisa.breslaw@alumni.unlv.edu)  
Plaintiff, In Proper Person

**DISTRICT COURT  
CLARK COUNTY , NV**

Lisa Breslaw  
Plaintiff

Case No. A-21-837948-C  
Dept. 3

vs.

Peter Cooper  
Defendant

**ERRATA FOR OPPOSITION MOTION**

Throughout the document, the pronouns "he" and "they" were used inconsistently when referring to Defendant. To Plaintiff's knowledge, based on what Defendant has shared on social media, their preferred pronouns are "they" and "them." Any reference to Defendant as "he" was accidental and done out of habit rather than intentionally.

In the last paragraph on jurisdiction, the word "assessing" was misspelled as "accessing." The sentence should read "Finally, in assessing the reasonableness of jurisdiction..."

In the section addressing jurisdiction, there were a couple mentionings of "the professor." Plaintiff wants to clarify that she was referring to Dr. Marcia Gallo.

Court should refer to Exhibit 6 to see the subredditdrama post itself.

/s/ Lisa Breslaw  
Plaintiff, In Proper Person







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11/5/2021 11:32 AM  
Steven D. Grierson  
CLERK OF THE COURT

*Steven D. Grierson*

students.

/r/AskAcademia /u/Gemini725

### Am I Cut Out for Graduate School?

I graduated last year with a bachelor's degree in interdisciplinary studies. Until recently, I was 100% sure I wanted to attend graduate school, hoping to first earn an M.A. in American History and then proceed to a Ph.D. I graduated with a 3.93 GPA and 6 graduate level history courses, but I never took more than 12 credits at a time and did not work at all throughout undergrad.

My major setback came during my final undergraduate semester. It was a pretty stressful time for me because I experienced housing insecurity for over half the semester and was moving every few days until my living situation finally stabilized. This happened to coincide with the semester I was taking a graduate level history class not only in the very area I wanted to study but with a professor that I greatly admired. The course included a 25 page (min.) research paper, however, because of my housing situation, I had a much later start on the paper than planned. (I should also mention that I have an anxiety disorder that impairs my ability to handle stress.)

Additionally, I had asked the professor to be my adviser about a month before the semester ended, but after she explained that she was retiring, I fell into a depression which impaired my concentration. Furthermore, I later decided to change topics and had to start from the beginning (which was admittedly petulant, but I was depressed over her not being my adviser). Long story short, I ended up starting the paper less than a week before it was due and it was written in a horrible state of mind. I ended up receiving an A- on it, but there were egregious typos/mistakes and formatting/citation errors. Additionally, it was barely 25 pages (I hoped for something twice that length) and only used about 15 sources which only included 2 books (the rest journal articles). It gets better...the professor actually gave me a one day extension (and then another day), but when she said she "wasn't pleased" with having to do it, my depression deepened and I was barely able to concentrate on the revisions. Sometimes I think the final draft was actually worse than the original...

Also, based on her feedback, I could tell that even the A- was given out of sympathy (I got an A in the course), and at that

9/13/2019, 3:41:26 PM



and had to start from the beginning (which was admittedly petulant, but I was depressed over her not being my adviser). Long story short, I ended up starting the paper less than a week before it was due and it was written in a horrible state of mind. I ended up receiving an A- on it, but there were egregious typos/mistakes and formatting/citation errors. Additionally, it was barely 25 pages (I hoped for something twice that length) and only used about 15 sources which only included 2 books (the rest journal articles). It gets better...the professor actually gave me a one day extension (and then another day), but when she said she "wasn't pleased" with having to do it, my depression deepened and I was barely able to concentrate on the revisions. Sometimes I think the final draft was actually worse than the original...

Also, based on her feedback, I could tell that even the A- was given out of sympathy (I got an A in the course), and at that point I doubted that she saw me as graduate school material. (She knew about the housing situation and that I changed topics late in the semester, but she didn't know about my depression \[and it was situation and not clinical\]). Our relationship subsequently soured when I reported her to the department chair for what I perceived was a curt response to another email I sent her as well the fact that she ignored the follow-up email (and also mentioned her saying that she "wasn't pleased" etc.) I later tried to apologize for overreacting and explained my anxiety disorder (which is documented) and that I felt depressed that she couldn't be my adviser, but she ignored this email and the next one I sent (both requesting letters of recommendation).

I posted some of this in more detail on the "Ask Professors of Reddit" sub, and while the consensus seems to be that I ruined our relationship when I went to the chair, I still can't help but wonder if she simply didn't think I was capable of graduate school because of that paper. While there were extenuating circumstances for it, the fact was that the quality was affected. It seems the type of undergrads that go on to graduate studies are the ones who could write a perfect research paper in one or two nights regardless of how anxious or depressed they're feeling. I tend to be a perfectionist and think it's important to find the right sources, read through them thoroughly etc, but again, maybe I should have been able to do all that within a few days (especially with the extensions) regardless of my state of mind. I'm also starting to question how I would be able to handle the course load of graduate school while simultaneously teaching courses and doing multiple research projects (on top of a thesis) etc. With all that said, I really enjoy research/writing (despite this setback) and still hope to attend, but I want to have a realistic idea of what I'm getting into. Have I been too hard on myself over this paper or does it sound like I might struggle in graduate school? (Again, I'm hoping to start with an M.A. but then go on to a Ph.D.) I would appreciate honest feedback.

12/6/2019, 12:08:46 AM

### Follow-up Question to Emotional Distress Post

Earlier this week I inquired about whether I had an emotional distress case against my school for the way they handled a "grievance" I had written to my department chair about a professor. In summary, I wrote to him in an acute state of anxiety (I have generalized anxiety disorder and obsessive compulsive disorder) when I perceived this professor's tone as curt. I later tried to explain the situation to the dean (that my perception of her tone was affected by my anxiety) and requested that any punishment to her be reversed. The dean then assured me that the professor wasn't upset with me and even seemed likely to write a lot of recommendation, so I decided to write her an apology letter, and while I realize this looks insincere, I included the letter of recommendation request based on the dean's response. Needless to say, I was crestfallen when the professor didn't reply to that letter, and I then complained about the department chair when he refused to help us reconcile. (No explanation was given, he simply ignored my emails.)

Anyway, the consensus on here was that I did not have a case, and I decided not to pursue it (one of the reasons being that I'm considering applying to grad. school there since I don't want to relocate). I had also given up on reconciling with the professor, believing that she had retired. However, today I learned that she has not actually retired yet, but is teaching online from another state.

I learned this because I had called the dept. for an unrelated matter and decided to talk to the admin. assistant about the situation. She said she would give my message to the chair (that I want to apologize to the professor, explain that I was being affected by a disability etc.), but I'm not expected to get anywhere with him since the university has essentially closed the matter. (I also specified that I wasn't requesting a letter of recommendation or any other favor from the prof.)

My first question is: Could the professor have been counseled/instructed not to have any further contact with me once I had written to the chair? I don't understand why I'm being prevented from apologizing and essentially trying to erase any damage my behavior might have caused to her.

Next: Now that I know she's not officially retired, would it be okay to write her another letter myself (not requesting a letter of

from another state.

I learned this because I had called the dept. for an unrelated matter and decided to talk to the admin. assistant about the situation. She said she would give my message to the chair (that I want to apologize to the professor, explain that I was being affected by a disability etc.), but I'm not expected to get anywhere with him since the university has essentially closed the matter. (I also specified that I wasn't requesting a letter of recommendation or any other favor from the prof.)

My first question is: Could the professor have been counseled/instructed not to have any further contact with me once I had written to the chair? I don't understand why I'm being prevented from apologizing and essentially trying to erase any damage my behavior might have caused to her.

Next: Now that I know she's not officially retired, would it be okay to write her another letter myself (not requesting a letter of recommendation this time)? I haven't written to her in months, but I have been rather persistent/impertunate about the matter with the university; thus, I don't want to be charged with harassment. (Could they even do that?)

Also, are there any legal prohibitions against responding to such a letter from a student? I realized that she might not be able to say that she "forgives me," etc. because although I take complete responsibility for the matter, such wording implies the student's at fault, and they may not be allowed to acknowledge that. Likewise, there may be legal issues around saying "I understand your disability," etc.

Alternatively, am I overanalyzing this? Is it more likely that she doesn't want to respond to me because...she's pissed that I filed a grievance against her. If that was the case, then does the school have any liability for lying to me about her not being upset and even willing to write a letter of recommendation (and/or about her retirement)?

Again, I've been quite upset over this for a while and am just trying to figure out what's going on since I never got a answers. TLDR: I'm trying to figure out if my professor would be legally prohibited from communicating with me or accepting my apology even if she wanted to.

work with another adviser.

/r/AskProfessors /u/Gemini725

### Update on My Situation/What to Expect?

&#x200B;

After complaining to the dean, provost, and Board of Regents only to have my case closed re: the department chair mishandling my email about the professor, I then wrote to someone in human resources asking that the grievance (if it exists in writing) be removed from her personnel file and any consequences she suffered reversed (and for her to be aware of my requests). This was almost 2 weeks ago, and when I didn't hear back from them after a while, I assumed they had been instructed to ignore me. Soon thereafter, I called the local newspaper's higher education reporter and explained what happened and how it seems too easy to file a grievance against a faculty member at that university (which could reflect dysfunctional departments, admin. etc.). The reporter said they had contacted the school and would get back to me. This morning they said that they hadn't heard back from them yet, but I later received an email from human resources saying that while faculty's personnel files are confidential, they want to assure me that "the information I offered was accepted."

So, does this sound like they're granting my requests, and if so, would they call a retired faculty member to inform them that a grievance was reversed? If they do, what should I expect from her (the professor)? Would it be wrong of her not to at least email me saying that she appreciates my efforts? How would you react in such a situation? I'm now worried that after all my efforts, maybe she doesn't even care one way or another. I've gone to great lengths to reverse this situation, and in the process have not only embarrassed myself but sacrificed my own credibility and possibly demolished my chances at attending grad. school at this school. If she's who I thought she was (or perhaps hoped she was), all of this was worth it. Yet, it will be disheartening to go through all this trouble only for it not to be appreciated. Again, I just want to know what to expect. (Maybe they won't even tell her but I'll think they have and jump to negative conclusions again etc.)

/r/AskAcademia /u/Gemini725

### Update on My Situation

After complaining to the dean, provost, and Board of Regents only to have my case closed re: the department chair mishandling my email about the professor, I then wrote to someone in human resources asking that the grievance (if it exists



### Succeeding in Grad. School/Academia with an Anxiety Disorder

While most of my posts until this point have been about the drama with the professor and dept. chair (which seems to have made me a pariah on this sub), I'm taking a reprieve from that here, and would like to ask if anyone shares my other fears/anxieties and how they managed to succeed in academia/grad. school with them. Alternatively, do my specific anxieties make me incompatible with the culture of academia?

1. I love my city too much to permanently relocate, and I sometimes have difficulty adjusting to change (depending on the situation). Yet, academia seems very transient. I guess things do become more stable once you get tenure (which I understand is long shot to begin with), but even if I made it that far, I wouldn't be willing to move absolutely anywhere to achieve it. Even if I was willing to move from this city (which I'm not), there are some cities/regions that I'd refuse to relocate to.
2. I'm afraid of flying. I could possibly handle a short flight (i.e. no more than hour or hour 1/2 tops), but the idea of "frequent flying" (especially across long distances or internationally) terrifies me. Then, there's the worry of having some type of medical emergency in an unfamiliar city and not being having my own doctor nearby or being familiar with which are the good hospitals etc. (I know something like that is unlikely...but you never know, things happen.)
3. I become easily stressed. I found my undergraduate courses relatively easy/non stressful (My circumstances during my last undergrad. semester were an outlier). However, I didn't work at all throughout this period, and I worry about the pressures of graduate school. (Taking courses while being a teaching or research assistant and having to submit work to conferences all while working on my thesis/dissertation etc.) \\*This is the least of my worries, and I suppose I could always request accommodations through the DRC, if necessary (i.e. reduced course load or extended deadlines.) I'm actually looking forward to the challenge, as I don't feel an undergrad. education means much these days.

\\*For those that have been following my situation, I don't anticipate another one like it recurring. My behavior in that situation stemmed from the fact that I admired that professor so much (and it's unlikely I'll develop the same attachment to another one \[maybe that's a good thing\]). The more I care about a person, the more anxious I become about the relationship (in any type of relationship). Normally, I would not have acted as I did.



12/7/2019, 1:49:21 AM

Would This be Considered Stalking?

I had a fallout with a former professor many months ago (completely my fault since I reported her to admin. over essentially nothing), and I can't seem to get over it. Although this professor is the same one I mentioned re: a potential lawsuit against the university, this post is in no way related to legal action against the school or any of it's faculty/personnel. (So hopefully it's not considered a duplicate post.)

Anyway, after thinking she had retired, I found out yesterday that she was still in fact teaching part-time online. (She's currently residing in another state.) I learned this through the department's admin. assistant when inquiring about an unrelated matter (and couldn't help bringing this up). She said that while she was not permitted to contact faculty about such matters directly, she would pass my message along to the chair. Again, I only wanted her to know how remorseful I was and that my conduct was being affected by a disability. (I was not asking for a letter of recommendation or anything in return this time.) I don't know why I allowed myself to get my hopes up, but as should have been expected the chair informed the dean that I had mentioned this, and I received the same generic email from her \[the dean\] stating that "the matter has been closed and the professor has no ill will toward me etc." So, I've officially given up trying to reconcile with her through the university.

However, I want to ask someone she knows outside of the university (though still a professional acquaintance) to explain the situation to her (i.e. that I was affected by a disability and that I feel very remorseful about the situation and wish her the best etc.) However, could this be considered stalking?

12/6/2019, 8:29:30 PM

Odd Limerence

This is probably going to sound like a troll post, but it's not. I developed a peculiar limerent attachment to a professor who taught me a total of 2 semesters (one of them being a short summer semester). I'm a straight female in my late thirties and this professor is a woman 30 years my senior.

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152

the 1990s, the number of people in the United States who are 65 years of age and older has increased by 50 percent. The number of people 75 years of age and older has increased by 100 percent. The number of people 85 years of age and older has increased by 200 percent. The number of people 95 years of age and older has increased by 400 percent. The number of people 100 years of age and older has increased by 1,000 percent. The number of people 105 years of age and older has increased by 2,000 percent. The number of people 110 years of age and older has increased by 4,000 percent. The number of people 115 years of age and older has increased by 8,000 percent. The number of people 120 years of age and older has increased by 16,000 percent. The number of people 125 years of age and older has increased by 32,000 percent. The number of people 130 years of age and older has increased by 64,000 percent. The number of people 135 years of age and older has increased by 128,000 percent. The number of people 140 years of age and older has increased by 256,000 percent. The number of people 145 years of age and older has increased by 512,000 percent. The number of people 150 years of age and older has increased by 1,024,000 percent. The number of people 155 years of age and older has increased by 2,048,000 percent. The number of people 160 years of age and older has increased by 4,096,000 percent. The number of people 165 years of age and older has increased by 8,192,000 percent. The number of people 170 years of age and older has increased by 16,384,000 percent. The number of people 175 years of age and older has increased by 32,768,000 percent. The number of people 180 years of age and older has increased by 65,536,000 percent. The number of people 185 years of age and older has increased by 131,072,000 percent. The number of people 190 years of age and older has increased by 262,144,000 percent. The number of people 195 years of age and older has increased by 524,288,000 percent. The number of people 200 years of age and older has increased by 1,048,576,000 percent. The number of people 205 years of age and older has increased by 2,097,152,000 percent. The number of people 210 years of age and older has increased by 4,194,304,000 percent. The number of people 215 years of age and older has increased by 8,388,608,000 percent. The number of people 220 years of age and older has increased by 16,777,216,000 percent. The number of people 225 years of age and older has increased by 33,554,432,000 percent. The number of people 230 years of age and older has increased by 67,108,864,000 percent. The number of people 235 years of age and older has increased by 134,217,728,000 percent. The number of people 240 years of age and older has increased by 268,435,456,000 percent. The number of people 245 years of age and older has increased by 536,870,912,000 percent. The number of people 250 years of age and older has increased by 1,073,741,824,000 percent. The number of people 255 years of age and older has increased by 2,147,483,648,000 percent. The number of people 260 years of age and older has increased by 4,294,967,296,000 percent. The number of people 265 years of age and older has increased by 8,589,934,592,000 percent. The number of people 270 years of age and older has increased by 17,179,869,184,000 percent. The number of people 275 years of age and older has increased by 34,359,738,368,000 percent. The number of people 280 years of age and older has increased by 68,719,476,736,000 percent. The number of people 285 years of age and older has increased by 137,438,953,472,000 percent. The number of people 290 years of age and older has increased by 274,877,906,944,000 percent. The number of people 295 years of age and older has increased by 549,755,813,888,000 percent. The number of people 300 years of age and older has increased by 1,099,511,627,776,000 percent. The number of people 305 years of age and older has increased by 2,199,023,255,552,000 percent. The number of people 310 years of age and older has increased by 4,398,046,511,104,000 percent. The number of people 315 years of age and older has increased by 8,796,093,022,208,000 percent. The number of people 320 years of age and older has increased by 17,592,186,044,416,000 percent. The number of people 325 years of age and older has increased by 35,184,372,088,832,000 percent. The number of people 330 years of age and older has increased by 70,368,744,177,664,000 percent. The number of people 335 years of age and older has increased by 140,737,488,355,328,000 percent. The number of people 340 years of age and older has increased by 281,474,976,710,656,000 percent. The number of people 345 years of age and older has increased by 562,949,953,421,312,000 percent. The number of people 350 years of age and older has increased by 1,125,899,906,842,624,000 percent. The number of people 355 years of age and older has increased by 2,251,799,813,685,248,000 percent. The number of people 360 years of age and older has increased by 4,503,599,627,370,496,000 percent. The number of people 365 years of age and older has increased by 9,007,199,254,740,992,000 percent. The number of people 370 years of age and older has increased by 18,014,398,509,481,984,000 percent. The number of people 375 years of age and older has increased by 36,028,797,018,963,968,000 percent. The number of people 380 years of age and older has increased by 72,057,594,037,927,936,000 percent. The number of people 385 years of age and older has increased by 144,115,188,075,855,872,000 percent. The number of people 390 years of age and older has increased by 288,230,376,151,711,744,000 percent. The number of people 395 years of age and older has increased by 576,460,752,303,423,488,000 percent. The number of people 400 years of age and older has increased by 1,152,921,504,606,846,976,000 percent. The number of people 405 years of age and older has increased by 2,305,843,009,213,693,952,000 percent. The number of people 410 years of age and older has increased by 4,611,686,018,427,387,904,000 percent. The number of people 415 years of age and older has increased by 9,223,372,036,854,775,808,000 percent. The number of people 420 years of age and older has increased by 18,446,744,073,709,551,616,000 percent. The number of people 425 years of age and older has increased by 36,893,488,147,419,103,232,000 percent. The number of people 430 years of age and older has increased by 73,786,976,294,838,206,464,000 percent. The number of people 435 years of age and older has increased by 147,573,952,589,676,412,928,000 percent. The number of people 440 years of age and older has increased by 295,147,905,179,352,825,856,000 percent. The number of people 445 years of age and older has increased by 590,295,810,358,705,651,712,000 percent. The number of people 450 years of age and older has increased by 1,180,591,620,717,411,303,424,000 percent. The number of people 455 years of age and older has increased by 2,361,183,241,434,822,606,848,000 percent. The number of people 460 years of age and older has increased by 4,722,366,482,869,645,213,696,000 percent. The number of people 465 years of age and older has increased by 9,444,732,965,739,290,427,392,000 percent. The number of people 470 years of age and older has increased by 18,889,465,931,478,580,854,784,000 percent. The number of people 475 years of age and older has increased by 37,778,931,862,957,161,709,568,000 percent. The number of people 480 years of age and older has increased by 75,557,863,725,914,323,419,136,000 percent. The number of people 485 years of age and older has increased by 151,115,727,451,828,646,838,272,000 percent. The number of people 490 years of age and older has increased by 302,231,454,903,657,293,676,544,000 percent. The number of people 495 years of age and older has increased by 604,462,909,807,314,587,353,088,000 percent. The number of people 500 years of age and older has increased by 1,208,925,819,614,629,174,706,176,000 percent. The number of people 505 years of age and older has increased by 2,417,851,639,229,258,349,412,352,000 percent. The number of people 510 years of age and older has increased by 4,835,703,278,458,516,698,824,704,000 percent. The number of people 515 years of age and older has increased by 9,671,406,556,917,033,397,649,408,000 percent. The number of people 520 years of age and older has increased by 19,342,813,113,834,066,795,298,816,000 percent. The number of people 525 years of age and older has increased by 38,685,626,227,668,133,590,597,632,000 percent. The number of people 530 years of age and older has increased by 77,371,252,455,336,267,181,195,264,000 percent. The number of people 535 years of age and older has increased by 154,742,504,910,672,534,362,390,528,000 percent. The number of people 540 years of age and older has increased by 309,485,009,821,345,068,724,781,056,000 percent. The number of people 545 years of age and older has increased by 618,970,019,642,690,137,449,562,112,000 percent. The number of people 550 years of age and older has increased by 1,237,940,039,285,380,274,899,124,224,000 percent. The number of people 555 years of age and older has increased by 2,475,880,078,570,760,549,798,248,448,000 percent. The number of people 560 years of age and older has increased by 4,951,760,157,141,521,099,596,496,896,000 percent. The number of people 565 years of age and older has increased by 9,903,520,314,283,042,199,193,993,792,000 percent. The number of people 570 years of age and older has increased by 19,807,040,628,566,084,398,387,9

So in attempt to demonstrate that I could produce better work (and have a reason to interact with her), I decided to submit a proposal to a conference. I knew she was attending. (I had no experience in this area, but my abstract was somehow better than the others.)

Later in the semester, I had asked her to be my graduate advisor. By this time I was completely obsessed with her, thus, when she informed me that she was in the process of retiring and not accepting new students, I became despondent (not in front of her). However, I was still able to do well on quizzes/exams, but my motivation had plummeted and I had difficulty focusing on the research paper. As the due date approached however, I regained some of my ambition (deciding that I couldn't let my grade fail), and tried to cram months of research into about a week...Additionally, the depression made it difficult for me to focus, and the paper turned out sloppy. While I ended up receiving an A- on it (likely out of mercy), I knew this wasn't graduate level work and worried that she must have perceived me as stupid or lazy.

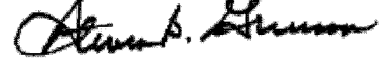
So in attempt to demonstrate that I could produce better work (and have a reason to interact with her), I decided to submit a proposal to a conference I knew she was attending. (I had no experience in this area, but my abstract was somehow accepted.) I then emailed her asking for assistance with finding volunteers (the project involved interviewing college students) and was devastated when I perceived the reply as curt. If taken at face value, she may have been a little upset that I had submitted the abstract before beginning the project and wanted to convey that I was in over my head. My anxiety, however, began escalating, and I decided to write her again a few days later—offering to withdraw the proposal but still asking for her assistance with finding volunteers. (I was completely out of my mind by this point, and just wanted reassurance that she wasn't upset with me.) When she didn't respond to this email after 24 hrs (she normally responded quickly to emails), I impulsively wrote to the department chair, complaining about her lack of response, the "curt" tone of her previous response, and other times where I perceived subtle fluctuations in her mood/tone. I later apologized and tried to rescind the grievance, but it's clear that she wants nothing to do with me now.

Although I'm devastated that our relationship has soured, I realize this relationship probably never existed outside of my mind. I was hoping that we would have stayed in touch after her retirement, but in retrospect, she probably wouldn't have wanted to stay in touch with a student she barely knew. Still, I sometimes can't help but think that she might have liked this had my paper turned out better (and I had not reported her to the chair.) So I'd appreciate outside perspectives on this. Does it sound like the potential relationship (by which I mean just staying in touch and maybe visiting each other once every so often) was lost or that there was never any possibility of it?









Lisa Breslaw  
7050 Shady Palms St.  
Las Vegas, NV 89131  
[lisa.breslaw@alumni.unlv.edu](mailto:lisa.breslaw@alumni.unlv.edu)  
Plaintiff, In Proper Person

**DISTRICT COURT  
CLARK COUNTY , NV**

Lisa Breslaw  
Plaintiff

Case No. A-21-837948-C  
Dept. 3

vs.

Peter Cooper  
Defendant

**ERRATA FOR OPPOSITION MOTION (Updated)**

In addition to the material included in the original Errata for Opposition Motion (to Dismiss), Plaintiff wishes to make the following clarifications:

In the third paragraph, she stated: "implicit in Defendant's allegation that Plaintiff stalked her retired professor was that UNLV allowed an employee to be stalked." Dr. Gallo was teaching part-time for UNLV during the period Defendant accused Plaintiff of "stalking" her. While she was in the process of phased-in retirement, even being a part-time faculty member gave UNLV a duty of care to her. Thus, by alleging that Plaintiff was stalking her "retired professor," Defendant alleged that UNLV allowed a faculty-member/employee to be stalked. Therefore, Defendant's allegations impacted interests within the state.

The last sentence of the first paragraph addressing libel per se should read: " Being accused of stalking a retired professor tends to have these effects, and the ridicule and scorn is evident from the comments on Plaintiff's Reddit posts during and after the SRD post, as well as other posts made about her after the SRD post." (None of those posts received the same level of attention that the SRD post received, and they were made because people already recognized Plaintiff from the SRD post.)

Plaintiff also wishes to clarify that her "Not wanting to be charged with harassment (re: Dr. Hobson)" was a precaution. Neither Dr. Hobson nor UNR threatened her with harassment charges. However, it is clear based on further communications with UNR that Dr. Hobson does not wish to speak to Plaintiff.

The case no. for this case is A-21-837948-C and any references on the previously filed errata refer to this same case.



1 CNND

2 **DISTRICT COURT**  
3 **CLARK COUNTY, NEVADA**

4  
5 Lisa Breslaw, Plaintiff(s)

A-21-837948-C

6 vs.

Department 3

7  
8 Peter Cooper, Defendant(s)

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10 **CLERK'S NOTICE OF NONCONFORMING DOCUMENT**

11  
12 Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, notice is  
13 hereby provided that the following electronically filed document does not conform to the  
14 applicable filing requirements:

15  
16 Title of Nonconforming Document:

Errata for Opposition Motion for  
A-2183748-C

17 Party Submitting Document for Filing:

Plaintiff

18 Date and Time Submitted for Electronic  
19 Filing:

11/04/2021 at 5:47 PM

20 Reason for Nonconformity Determination:

- 21 ☐ The document filed to commence an action is not a complaint, petition,  
22 application, or other document that initiates a civil action. See Rule 3 of the  
23 Nevada Rules of Civil Procedure. In accordance with Administrative Order 19-5,  
24 the submitted document is stricken from the record, this case has been closed and  
25 designated as filed in error, and any submitted filing fee has been returned to the  
26 filing party.

- 1 ☐ The document initiated a new civil action and a cover sheet was not submitted as  
2 required by NRS 3.275.
- 3 ☒ The document was not signed by the submitting party or counsel for said party.  
4
- 5 ☒ The case caption and/or case number on the document does not match the case  
6 caption and/or case number of the case that it was filed into.
- 7 ☐ The document filed was a court order that did not contain the signature of a  
8 judicial officer. In accordance with Administrative Order 19-5, the submitted  
9 order has been furnished to the department to which this case is assigned.
- 10 ☐ Motion does not have a hearing designation per Rule 2.20(b). Motions must  
11 include designation "Hearing Requested" or "Hearing Not Requested" in the  
12 caption of the first page directly below the Case and Department Number.

13 Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, a  
14 nonconforming document may be cured by submitting a conforming document. All documents  
15 submitted for this purpose must use filing code "**Conforming Filing – CONFILE.**" Court filing  
16 fees will not be assessed for submitting the conforming document. Processing and convenience  
17 fees may still apply.  
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21 Dated this: 16th day of November, 2021

22  
23 By: /s/ Chaunte Pleasant

24 Deputy District Court Clerk  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 16, 2021, I concurrently filed and served a copy of the foregoing Clerk’s Notice of Nonconforming Document, on the party that submitted the nonconforming document, via the Eighth Judicial District Court’s Electronic Filing and Service System.

By:       /s/ Chaunte Pleasant        
Deputy District Court Clerk



1 CNND

2 **DISTRICT COURT**  
3 **CLARK COUNTY, NEVADA**

4  
5 Lisa Breslaw, Plaintiff(s)

A-21-837948-C

6 vs.

Department 3

7  
8 Peter Cooper, Defendant(s)

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10 **CLERK'S NOTICE OF NONCONFORMING DOCUMENT**

11  
12 Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, notice is  
13 hereby provided that the following electronically filed document does not conform to the  
14 applicable filing requirements:

15  
16 Title of Nonconforming Document:

Errata for Opposition Motion  
(Updated)

17 Party Submitting Document for Filing:

Plaintiff

18 Date and Time Submitted for Electronic  
19 Filing:

11/06/2021 at 5:57 PM

20 Reason for Nonconformity Determination:

- 21 ☐ The document filed to commence an action is not a complaint, petition,  
22 application, or other document that initiates a civil action. See Rule 3 of the  
23 Nevada Rules of Civil Procedure. In accordance with Administrative Order 19-5,  
24 the submitted document is stricken from the record, this case has been closed and  
25 designated as filed in error, and any submitted filing fee has been returned to the  
26 filing party.



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- ☐ The document initiated a new civil action and a cover sheet was not submitted as required by NRS 3.275.
- ☒ The document was not signed by the submitting party or counsel for said party.
- ☐ The document filed was a court order that did not contain the signature of a judicial officer. In accordance with Administrative Order 19-5, the submitted order has been furnished to the department to which this case is assigned.
- ☐ Motion does not have a hearing designation per Rule 2.20(b). Motions must include designation "Hearing Requested" or "Hearing Not Requested" in the caption of the first page directly below the Case and Department Number.

Pursuant to Rule 8(b)(2) of the Nevada Electronic Filing and Conversion Rules, a nonconforming document may be cured by submitting a conforming document. All documents submitted for this purpose must use filing code **"Conforming Filing – CONFILE."** Court filing fees will not be assessed for submitting the conforming document. Processing and convenience fees may still apply.

Dated this: 16th day of November, 2021

By:           /s/ Chaunte Pleasant            
Deputy District Court Clerk

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 16, 2021, I concurrently filed and served a copy of the foregoing Clerk’s Notice of Nonconforming Document, on the party that submitted the nonconforming document, via the Eighth Judicial District Court’s Electronic Filing and Service System.

By:       /s/ Chaunte Pleasant        
Deputy District Court Clerk



CNNDCA

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

Lisa Breslaw, Plaintiff(s)                      A-21-837948-C  
vs.  
Peter Cooper, Defendant(s)                      Department 3

**CLERK'S NOTICE OF CURATIVE ACTION**

In accordance with NEFCR 8(b)(2), notice is hereby provided that the Clerk's Office has replaced the following nonconforming document(s) with conforming document(s):

Title of Nonconforming Document:	<u>Errata for Opposition Motion</u>
Party Submitting Document for Filing:	<u>Plaintiff</u>
Date and Time Submitted for Electronic Filing:	<u>11/04/2021 at 5:47 PM</u>

The conforming document(s) have been filed with a time and date stamp which match the time and date that the nonconforming document(s) were submitted for electronic filing.

Dated this: 29th day of November, 2021.

By: /s/ Chaunte Pleasant  
Deputy District Court Clerk

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 29, 2021, I concurrently filed and served a copy of the foregoing Clerk’s Notice of Curative Action, on the party that submitted the nonconforming document and all registered users receiving service under NEFCR 9(b), via the Eighth Judicial District Court’s Electronic Filing and Service System.

By:     /s/ Chaunte Pleasant      
Deputy District Court Clerk



**MDSM**  
Sagar Raich, ESQ.  
NEVADA BAR NO. 13229  
6785 S. Eastern Ave. Ste. 5  
Las Vegas, NV 89119  
Telephone: (702) 758-4240  
Facsimile: (702) 998-6930  
Email: sraich@raichattorneys.com  
Attorney for Defendant, Peter Cooper

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

LISA BRESLAW;  
Plaintiff(s),  
vs.  
PETER COOPER,  
Defendant(s).

Case No.: A-21-837948-C  
Dept. No.: III

**REPLY RE DEFENDANT'S MOTION  
TO DISMISS**

**Hearing Date/Time: Jan. 4, 2022 / 9:00 am**

Defendant PETER COOPER ("COOPER" or "Defendant"), by and through attorney Sagar Raich, Esq. of Raich Law PLLC, hereby files this reply to the prior filed motion to dismiss the claim(s) alleged by Plaintiff LISA BRESLAW ("BRESLAW" or "Plaintiff") against said Defendant via Plaintiff's Complaint filed on July 15, 2021, on file herein.

This reply is made and based upon the pleadings and papers on file, the attached memorandum of points and authorities, and any oral argument that the Court may entertain at the time of the Hearing on this matter.

Dated this 3<sup>rd</sup> day of December, 2021. /s/ Sagar Raich

SAGAR RAICH  
NEVADA BAR 13229  
RAICH LAW PLLC  
6785 S. Eastern Ave., Suite 5  
Las Vegas, NV 89119  
Attorney for Defendant, Peter Cooper

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1 had contact with Nevada that may be characterized as systematic or continuous thus, general  
2 personal jurisdiction does not apply in this matter as “general personal jurisdiction exists when  
3 the defendant's forum state activities are so 'substantial' or 'continuous and systematic' that it is  
4 considered present in that forum and thus subject to suit there, even though the suit's claims are  
5 unrelated to that forum.” *Arbella Mut. Ins. Co. v. Dist. Ct.*, 134 P.3d 710, 122 Nev. 509 (Nev.,  
6 2006).

7       Regarding specific personal jurisdiction, “[a] state may exercise specific personal  
8 jurisdiction only where: (1) the defendant purposefully avails himself of the privilege of serving  
9 the market in the forum or of enjoying the protection of the laws of the forum, or where the  
10 defendant purposefully establishes contacts with the forum state and affirmatively directs  
11 conduct toward the forum state, and (2) the cause of action arises from that purposeful contact  
12 with the forum or conduct targeting the forum. Finally, in determining whether specific personal  
13 jurisdiction exists, a court must consider whether requiring the defendant to appear in the action  
14 would be reasonable.” *Id.*

15       Plaintiff's opposition attempts to lay claim to specific personal jurisdiction by stating that  
16 “the injuries and damages caused by Defendant's libelous post and harassment were felt by a NV  
17 resident while being present in NV...” *See* Opposition to Defendant's Motion to Dismiss, pg. 2,  
18 on file herein. Unfortunately, the Plaintiff being in Nevada is *not* the test – the test is whether a  
19 Defendant avails him/herself to the jurisdiction being challenged. Otherwise, Plaintiffs would be  
20 able to bring Defendants into court no matter where they were – for example, if Plaintiff in this  
21 case was on vacation to Switzerland when she saw the online posts, should Defendant be hailed  
22 into a Swiss court? Certainly, not.

1 Plaintiff cites *Calder v. Jones* in support of her argument, but unlike the *Calder* case, this  
2 matter does not concern a national magazine that had significant corporate presence in the state  
3 in which jurisdiction is sought and “in which the magazine has its largest circulation.” *Calder v.*  
4 *Jones*, 465 U.S. 783, 784, 104 S. Ct. 1482, 1484 (1984). Thus, unlike *Calder*, in this case, the  
5 Defendant, a student with no commercial or other ties to Nevada, *cannot* ‘reasonably anticipate  
6 being haled into court [in Nevada]’ to answer for the truth of the statements made ...” *Id.*

7 In this matter, by the admissions of the Plaintiff herself in her Complaint, it cannot be  
8 shown that “the defendant purposefully avail[ed] himself of the privilege of serving the market in  
9 the forum or of enjoying the protection of the laws of the forum” as the Defendant did not serve  
10 in Nevada or otherwise enjoy Nevada laws’ protection in any way, or that the Defendant  
11 “purposefully establishe[d] contacts with the forum state and affirmatively direct[ed] conduct  
12 toward the forum state, and (2) the cause of action arises from that purposeful contact with the  
13 forum or conduct targeting the forum” as the Defendant did not aim Defendant’s actions to the  
14 State of Nevada or have any purposeful contact with Nevada. *Arbella Mut. Ins. Co. v. Dist. Ct.*,  
15 134 P.3d 710, 122 Nev. 509 (Nev., 2006).

16 “Finally, in determining whether specific personal jurisdiction exists, a court must  
17 consider whether requiring the defendant to appear in the action would be reasonable.” *Id.* In this  
18 case, Plaintiff admits in her opposition that when Defendant allegedly made the post, “Defendant  
19 has moved across multiple jurisdictions” but admits that none of those jurisdictions were the  
20 State of Nevada. *See* Opposition to Defendant’s Motion to Dismiss, pg. 3, on file herein. Thus, it  
21 would certainly be unreasonable to have a defendant that had no contacts with Nevada to come  
22 defend a lawsuit in Nevada when Plaintiff admits to Defendant’s lack of direct involvement with  
23 the State of Nevada in any way.



1 Based on the foregoing, Nevada's jurisdiction over the Defendant in this matter would be  
2 highly improper, prejudicial, and unconstitutional.

3 **III. PLAINTIFF FAILS TO STATE A CLAIM FOR RELIEF FOR DEFAMATION**

4 Plaintiff attempts to cure the issues in the Complaint via additional facts in the opposition  
5 regarding falsity of the statements. However, "the general elements of a defamation claim  
6 require a plaintiff to prove: '(1) a false and defamatory statement by [a] defendant concerning the  
7 plaintiff; (2) an unprivileged publication to a third person; (3) fault, amounting to at least  
8 negligence; and (4) actual or presumed damages. *Pegasus v. Reno Newspapers, Inc.*, 118 Nev.  
9 706, 718, 57 P.3d 82, 90 (2002).' ... Statements are libel per se under Nevada law when they  
10 'naturally tend to degrade [the plaintiff] in the estimation of his fellow men, or hold him out to  
11 ridicule or scorn, or would tend to injure him in his business, occupation or profession.'" *Flowers*  
12 *v. Carville*, 292 F. Supp. 2d 1225, 1232 (D. Nev. 2003), *aff'd*, 161 Fed. Appx. 697 (9th Cir.  
13 2006) (citing *Talbot v. Mack*, 41 Nev. 245, 169 P. 25 (1917)). 2017 Nev. Dist. LEXIS 2013.

14 Even assuming Plaintiff's additional facts in the Opposition as true, the Plaintiff does not  
15 refute that the Defendant re-posted her comments. Plaintiff harassed UNLV employees to a point  
16 where UNLV's attorneys sent her a demand to cease and desist. Defendant's *recital* of such facts  
17 - that Plaintiff herself posted - is not defamation and the opposition does not even attempt to state  
18 that Plaintiff's allegations have met the elements of Defamation as required in Nevada.

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1 **IV. PLAINTIFF FAILS TO STATE A CLAIM FOR INTENTIONAL INFLICTION OF**  
2 **EMOTIONAL DISTRESS**

3 As argued in the motion, in Nevada, the elements for a claim of intentional infliction of  
4 emotional distress are: (1) that the defendant acts with extreme and outrageous conduct with  
5 either the intention of, or reckless disregard for, causing emotional distress; (2) that the plaintiff  
6 suffered severe or extreme emotional distress; and (3) that the defendant's conduct is the actual  
7 or proximate cause of plaintiff's emotional distress. *Switzer v. Rivera*, 174 F. Supp.2d 1097,  
8 1109 (D. Nev. 2001).

9 Plaintiff's opposition does not dispute that she made posts that the Defendant allegedly  
10 reposted – how can the Defendant act with “extreme and outrageous conduct” for merely  
11 repeating what the Plaintiff herself posted online?

12 Additionally, intentional infliction of emotional distress requires that “defendant's  
13 conduct [be] the actual or proximate cause of plaintiff's emotional distress.” *Id.* Defendant is not  
14 the proximate cause of any emotional distress as Plaintiff's emotional distress was caused by  
15 Plaintiff's fight with UNLV and failing to get into UNR, not by Defendant reposting Plaintiff's  
16 content. Plaintiff admits that she does not even know that admissions officials saw the posts and  
17 on the basis of those posts rejected her application - “faculty and administration at UNLV...  
18 **may have** witnessed the harassment” (emphasis added), *See* Opposition to Defendant's Motion  
19 to Dismiss, pg. 6, on file herein.

20 Based on the foregoing, Defendant requests that the claim of intentional infliction of  
21 emotional distress be dismissed for failure to state a claim.

22 ...

23 ...

1 **V. THE OPPOSITION ADMITS THAT THE ALLEGED POSTS ARE OF PUBLIC**  
2 **CONCERN**

3 “In *Shapiro v. Welt*, 133 Nev. 35, 39-40, 389 P.3d 262, 268 (2017), [the Nevada Supreme  
4 Court] explained that to determine whether an issue is one of public interest pursuant to NRS  
5 41.637(4), the district court must evaluate the issue using the following guiding principles:

6  
7 ‘(1) ‘public interest’ does not equate with mere curiosity;

8  
9 (2) a matter of public interest should be something of concern to a substantial number of people;  
10 a matter of concern to a speaker and a relatively small specific audience is not a matter of public  
11 interest;

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

14  
15 (4) the focus of the speaker's conduct should be the public interest rather than a mere effort to  
16 gather ammunition for another round of private controversy; and

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

19  
20 *Veterans in Politics Int’l v. Willick*, 457 P.3d 970 (Nev. 2020) (quoting *Shapiro v. Welt*, 133 Nev.  
21 35, 39-40, 389 P.3d 262, 268 (2017)); *see also Piping Rock Partners, Inc. v. David Lerner*  
22 *Assocs., Inc.*, 946 F. Supp. 2d 957, 968 (N.D. Cal. 2013), *aff’d*, 609 Fed. Appx. 497 (9th Cir.  
23 2015)); *see also Coker v. Sassone*, 135 Nev. 8, 13, 432 P.3d 746, 750-51 (2019).

1 Furthermore, "[A] moving party seeking protection under NRS 41.660 need only  
2 demonstrate [by a preponderance of evidence] that his or her conduct falls within one of [NRS  
3 41.637's] four . . . defined categories of speech," *Coker*, 135 Nev., Adv. Op. 2, 432 P.3d at 749  
4 (citing *Delucchi v. Songer*, 133 Nev. 290, 299, 396 P.3d 826, 833 (2017)), and that the statement  
5 is made truthfully or without knowledge of its falsehood. 'If a defendant makes this initial  
6 showing, the burden shifts to the plaintiff to show with prima facie evidence a probability of  
7 prevailing on the claim. NRS 41.660(3)(b).' *Veterans in Politics Int'l v. Willick*, 457 P.3d 970  
8 (Nev. 2020) quoting *Shapiro*, 133 Nev. at 38, 389 P.3d at 267.

9 In this matter, the Complaint itself alleges how this matter was an alleged public dispute  
10 (not mere curiosity), how the matter affects the Plaintiffs and tens of thousands of students at  
11 UNLV (not a small specific audience), how the Defendant's alleged actions caused the harm of  
12 UNLV and UNR officials not giving Plaintiff admission for graduate school (not a  
13 broad/amorphous public interest), how this matter is of public interest and not a private  
14 controversy, and how this was a public interest from the beginning – based on Plaintiff's public  
15 comments, not on private information between the parties communicated publically. *See*  
16 Complaint, generally, on file herein.

17 Furthermore, the allegations of the Complaint itself demonstrate that the Defendant  
18 merely reposted the content initially posted by the Plaintiff; as such, it is apparent that any  
19 statements made by the Defendant were made "truthfully or without knowledge of its falsehood"  
20 as required in *Veterans*. The burden therefore shifted to the Plaintiff to show the probability of  
21 prevailing on the claims, which the Plaintiff has not done. In fact, the Plaintiff admits to the  
22 public concern nature of the alleged online spat between the parties by stating that "Defendant's  
23 post impacted interests within NV ... because of its negative and potentially financially  
24

1 damaging impact on UNLV,” a public institution in Southern Nevada. *See* Opposition to  
2 Defendant’s Motion to Dismiss, pg. 2, on file herein.

3 Based on the foregoing, it is apparent that this is a matter of public concern. Thus, based  
4 on the public concern of the alleged posts, this matter should be dismissed as a matter of law.

5 **VI. CONCLUSION**

6 Nevada does not have should not have personal jurisdiction over the Defendant based on  
7 the allegations made by Plaintiff herself. Plaintiff has also failed to state a claim for libel per se  
8 or for intentional infliction of emotional distress. Finally, Defendant’s alleged online comments  
9 are matter of public concern protected by Nevada Revised Statutes. Based on the foregoing,  
10 Plaintiff has failed to meet her burden and Defendant requests the Court to dismiss this matter  
11 with prejudice.

12  
13 **PURSUANT TO EDCR 2.20, DEFENDANT REQUESTS ANY FILINGS SUBMITTED**  
14 **BY PLAINTIFF AFTER THE SUBMISSION OF THIS REPLY TO BE STRICKEN**  
15 **WITH PREJUDICE.**

16  
17 Dated this 3<sup>rd</sup> day of December, 2021.

18 /s/ Sagar Raich  
19 SAGAR RAICH, ESQ.  
20 NEVADA BAR 13229  
21 RAICH LAW PLLC  
22 6785 S. Eastern Ave., Suite 5  
23 Las Vegas, NV 89119  
24 Attorney for Defendant, Peter Cooper

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 3, 2021, I served a true and correct copy of the foregoing **Reply Re Defendant's Motion to Dismiss** through the electronic filing system of the Eighth Judicial District Court of the State of Nevada, pursuant to Nevada Electronic Filing and Conversion Rules upon the following:

Lisa Breslaw  
7050 Shady Palms Street  
Las Vegas, NV 89131  
lisa.breslaw@alumni.unlv.edu  
Plaintiff

/s/ Elizabeth Hermann  
An Employee of Raich Law PLLC



Lisa Breslaw  
7050 Shady Palms St.  
Las Vegas, NV 89131  
702-488-6989  
[lisa.breslaw@alumni.unlv.edu](mailto:lisa.breslaw@alumni.unlv.edu)  
Plaintiff, In Proper Person

**DISTRICT COURT  
CLARK COUNTY, NV**

Lisa Breslaw

Case No. A-21-837948-C

Dept. 3

Plaintiff

**HEARING REQUESTED**

vs.

Peter Cooper

Defendant

**MOTION FOR LEAVE TO FILE SUR-REPLY TO  
DEFENDANT'S MOTION TO DISMISS**

Plaintiff respectfully moves this Court for leave to file the attached Sur-Reply in response to Defendant's Reply Re: Motion to Dismiss on the following grounds:

In Defendant's Reply Re: Defendant's Motion To Dismiss, they, through their attorney, misrepresented and mischaracterized several of Plaintiff's statements and arguments such as:

- 1) That she "admits that does not even know whether it was Defendant that caused her harm" (See Reply to Defendant's Motion to Dismiss, p2)
- 2) That her argument for personal jurisdiction in NV amounted to only being present in NV when she read the defamatory statements (See Reply to Defendant's Motion To Dismiss, p3)
- 3) That Plaintiff admitted to harassing UNLV employees and did not even attempt to state that her allegations met the elements of Defamation as required in NV (See Reply to Defendant's Motion to Dismiss, p3)

4) That she doesn't even know that admissions officials at UNLV and UNR saw her posts

According to *Lewis vs. Rumsfeld*, "The Standard for granting a leave to file a surreply is whether the party making the motion would be unable to contest matters presented to the court for the first time in the opposing party's reply. *Lewis vs. Rumsfeld*, 154 F. Supp 2d 56, 61 (D.D.C.2001) Defendant's attorney's misrepresentations and mischaracterizations present information for the first time, and Plaintiff has not been able to contest these matters.

Plaintiff has also obtained new evidence supporting her claims and had planned to file a Supplemental Memorandum after the Thanksgiving holiday, after which UNLV's police services were to email her a statement showing that they do not have any records on her. However, right before the holiday, she began experiencing alarming medical and neurological symptoms, including a sudden inability to concentrate, which she sought medical attention for. (See exhibit 21) At the time of typing this, she is able to concentrate, and would like the opportunity to present this and other additional evidence and information which she would have included in the Supplemental Memorandum. In addition to the police statement, which shows that she did not stalk Dr. Gallo, she has also obtained her original abstract and proposal from the Oral History Association which shows that she had applied to the conference as a sole author, and nowhere did she either explicitly state or imply that Dr. Gallo (or anyone) would collaborate with her. These documents demonstrate the falsity of Defendant's defamatory statements. She would also also like to show that she is still trying to get records from Reddit.

According to Nev. R. Civ. P.15 (d) "On motion and reasonable notice, the court may, on just term, permit a party to serve a supplemental pleading setting out any transactions, occurrence, or event that happened after the date of the pleading to be supplemented. The court may permit supplementation even though the original pleading is defective in stating a claim or defense. The court may order that the opposing party plead to the supplemental pleading within a specified time."

For these reasons, she asks this Court to grant her leave to file the attached sur-reply below.

RESPECTFULLY SUBMITTED this 8th day of December, 2021

/s/Lisa Breslaw  
Plaintiff, In Proper Person  
7050 Shady Palms St.  
Las Vegas, NV 89131  
702-488-6989  
[lisa.breslaw@alumni.unlv.edu](mailto:lisa.breslaw@alumni.unlv.edu)



### **CERTIFICATE OF SERVICE**

I hereby certify that on December 8, 2021, I electronically transmitted the attached PLAINTIFF'S MOTION FOR LEAVE TO FILE SURREPLY along with the attached PLAINTIFF'S SURREPLY TO DEFENDANT'S REPLY RE: DEFENDANT'S MOTION TO DISMISS and accompanying exhibits through the electronic filing system of the Eighth Judicial District Court of the State of Nevada, pursuant to Nevada Electronic Filing and Conversion Rules upon the following:

Sagar Raich, Esq.  
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Telephone (702)758-4240  
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Email: [sraich@raichattorneys.com](mailto:sraich@raichattorneys.com)  
Attorney for Defendant, Peter Cooper

Lisa Breslaw  
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Plaintiff, In Proper Person

**DISTRICT COURT  
CLARK COUNTY, NV**

Lisa Breslaw  
  
Plaintiff

Case No. A-21-837948-C  
Dept. 3  
**HEARING REQUESTED**

vs.

Peter Cooper  
  
Defendant

**SUR-REPLY RE: REPLY RE: DEFENDANT'S MOTION TO DISMISS**

In Defendant's REPLY RE: DEFENDANT'S MOTION TO DISMISS, through their attorney, they misrepresented and mischaracterized Plaintiff's statements and arguments in her OPPOSITION TO DEFENDANT'S MOTION TO DISMISS, thereby raising new arguments and authorities that Plaintiff has not had the chance to contend. Plaintiff also presents the information and evidence that she had planned on filing in a Supplemental Memorandum, prior to experiencing alarming symptoms which she sought medical attention for. (See Exhibit 21) Having moved for leave to file a surreply in the accompanying motion Plaintiff hereby responds to these new arguments and authorities and presents the exhibits and arguments that she would have included in her Supplemental Memorandum

## **MEMORANDUM OF POINTS AND AUTHORITIES**

### **DEFENDANT'S IDENTITY**

First, Plaintiff never “admitted that she does not even know whether it was Defendant who caused her harm.” The statement that Defendant referred to in their Reply Re: Defendant’s Motion To Dismiss read: “Plaintiff has subpoenaed Reddit for the identity/subscriber information for one such troll account that she suspects to be Defendant.” (See Opposition To Motion To Dismiss, p2) There were a few troll accounts created specifically to harass Plaintiff from, and she said that she suspects that Defendant may have been behind at least some of these fake accounts. However, she never expressed any doubt that Defendant was behind u/thestickystickman, the account that created the libelous SRD post and u/DovhazulsABadConlang, another account that they admitted to harassing Plaintiff from.

Plaintiff is still working on trying to get the subscriber information from the requested accounts from Reddit (see exhibit 22), but even if Defendant was not behind the troll accounts, his conduct under u/thestickystickman and u/DovhazulsABadConlang alone meet the criteria for libel per se and intentional infliction of emotional distress.

Furthermore, even if Plaintiff is unable to obtain the requested information from Reddit, there is a preponderance of evidence that Defendant is indeed the same person who libeled and harassed her on Reddit.

First and foremost, Defendant accepted service of Plaintiff’s complaint and at no point denied that it was them who made the SRD post and harassed Plaintiff from multiple accounts on Reddit. If someone was wrongly served a complaint, they would have submitted an Affidavit to the Court swearing that they were not the right person to serve—not hire an attorney to defend the case.

Next, Defendant used the username thestickystickman across multiple social media platforms for about a decade, not only revealing their full name at times(i.e. on their old Steam Community profile) but providing copious and detailed autobiographical information and sharing photos of themselves. (Exhibit 23) In Oct. of 2021, Plaintiff hired Private Investigator Gregory Mesa of Adam and Eve Investigations in AZ who used facial recognition software to match the photos Defendant shared of themselves on Reddit to pictures of them (mentioned by name) with their family (parents Courtney and Alexander Cooper, grandfather Roger J. Cooper). (See exhibit 24.) These were not the same photos, which could have been copied and pasted from one site

to another; these were all different photos of the same person. These photos are also consistent with Defendant's Facebook profile picture <https://www.facebook.com/peter.cooper.121> plus the asexuality articles cited on Defendant's Facebook page are the same one's mentioned/shared on DovahzulsABadConglans Reddit account. (see exhibit25)

Greg Mesa also obtained background reports on Defendant's parents, Courtney and Alexander Cooper (See exhibit 26), and the information obtained was consistent with everything Defendant had posted about them on Reddit and social media. This includes their [the parents'] moving history in the US (including living in Tucson at the time of Peter's birth/childhood), their mother having lived in Alabama, their grandfather(Roger Cooper) living in Virginia, etc. Again, the information is consistent across all sites. For example, Alex Cooper's linkedin page matches the exact timeline that Peter described on Reddit regarding the family's moving history etc. <https://www.linkedin.com/in/alexcooperuk>

Even the family's Facebook profiles were found, and again, everything matches the background reports and the information Peter shared, such as the family moving back to the US (Boston) from the UK in July, etc. (exhibit 17). There's even a childhood pic of Peter of Peter on his grandfather, Roger Cooper's Facebook photo see (see exhibit 27), with his now brother, then called Hailey Cooper, and Parents Courtney and Alex Cooper. He also uses the name Asticky\_on Twitter ([https://mobile.twitter.com/asticky\\_?lang=ca](https://mobile.twitter.com/asticky_?lang=ca)), and not only is the biographical information and content consistent with his Reddit accounts, but he shared his brother's (f to m transgender) gofundme site for top surgery—the same one mentioned in the Affidavit of Due Diligence by Las Vegas private investigator, Sheila Whittaker which Defenant had originally shared on Reddit. (See Affidavit of Due Diligence filed on 8/24/2021)

There's also the fact that Peter was contacted by the South Yorkshire Police in April of 2020 for harassing Plaintiff, and that he then posted about it on Reddit—including bragging on the SRD post that he “unironically had the police called on him over an SRD post.” (See exhibits 10 and 13 and 6)

Finally, Plaintiff presented this information to process server Genice Rojas ( of LV Process and Investigations) in mid Oct. of 2021, and on Oct. 20th, after multiple attempts at contacting Peter and his family, she spoke to his grandfather, Roger J. Cooper, who confirmed that Peter was attending the University of Colorado Boulder, living on campus, and that his international phone number [from the UK] was recently canceled. (see exhibit 28) This information matches content which Peter recently posted on Reddit (see exhibit 29), and there was never any doubt by Roger that Genice was calling about his grandson. It was after this phone call to Roger, in fact, that Defendant agreed to be served through his attorney.

Once again, no one would accept service of a lawsuit meant for someone else, nor would an attorney begin addressing the lawsuit without even knowing that they were defending the right person. Hopefully the issue of Defendant's identity can finally be put to rest.

## **JURISDICTION**

Plaintiff's arguments for personal jurisdiction in NV was never, as Defendant's attorney states, that "she was in NV when she read the online posts." This again is a distortion of Plaintiff's statements and arguments. Plaintiff drew parallels between her case and *Calder vs. Jones* in order to demonstrate that it meets the *Calder* "effects test" in establishing personal jurisdiction in defamation cases. *Calder vs. Jones* was based on the "purposeful and targeted nature" of the defendant's actions, "not the alleged contacts between each petitioner and their state" ("*Calder and the Effects Test*", I. Glen Cohen, June 23, 2014)

Specifically the *Calder* Court Stated that:

"The allegedly libelous story concerned the California activities of a California resident. It impugned the professionalism of an entertainer whose television career was centered in California. The article was drawn from California sources, and the brunt of the harm, in terms both of respondent's emotional distress and the injury to her professional reputation, was suffered in California. In sum, California is the focal point both of the story and of the harm suffered. Jurisdiction over petitioners is therefore proper in California based on the "effects" of their Florida conduct in California." (*Calder v. Jones*, 788-89)

In Plaintiff's case, the libelous story concerned the NV activities of a NV resident and impugned the professionalism of a woman trying to pursue a graduate education and career in NV. It was also drawn from NV sources, given that, as Defendant's attorney states, the content was drawn from Plaintiff's posts, plus the brunt of the harm, both in terms of respondent's emotional distress and the injury to her professional reputation was suffered in NV. (See Opposition Motion to Motion to Dismiss pages 3 and 6) This is certainly not analogous to being on vacation in Switzerland and "hailing Defendant into a Swiss court." Even if Plaintiff would have been on vacation in Switzerland when she saw "the [libelous] online posts," the emotional distress and injury to her professional reputation would still have been suffered in NV given the circumstances stated above. Therefore, NV would still have jurisdiction no matter where Plaintiff was when she read the libelous post.

Conversely, in terms of reasonableness, just as most courts hold that a Defendant cannot be sued "anywhere" (i.e. being sued in a Swiss court just because a plaintiff happened to read libelous content about themselves while vacationing in Switzerland), jurisdiction over a Defendant cannot be "nowhere" just because a Defendant moves a lot.

Next, On page 4 of Defendant's Reply RE Defendant's Motion To Dismiss, Defendant claims that Plaintiff's case is unlike *Calder* because the Defendant is a "student with no commercial or other ties to NV." Even if it were true that Defendant had no commercial or other ties to NV, *Calder*, again, was not based on each petitioner's alleged contacts with the state. It was based on where the effects of the libelous content were felt.

Moreover, in addition to the Geographical hashtag (725) which Plaintiff mentioned in her Opposition to Defendant's Motion to Dismiss (see Opposition to Defendant's Motion to Dismiss page 2), doxing is another marker of social media activity sufficient to hail a user into court in