

IN THE SUPREME COURT OF THE STATE OF NEVADA

LISA BRESLAW,
Appellant(s),

vs.

PETER COOPER,
Respondent(s),

Electronically Filed
Feb 02 2022 10:56 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

Case No: A-21-837948-C

Docket No: 84072

RECORD ON APPEAL VOLUME 2

ATTORNEY FOR APPELLANT
LISA BRESLAW, PROPER PERSON
7050 SHADY PALMS ST.
LAS VEGAS, NV 89131

ATTORNEY FOR RESPONDENT
SAGAR RAICH, ESQ.
6785 S. EASTERN AVE., STE 5
LAS VEGAS, NV 89119

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4625 E 8TH ST, TUCSON, AZ 85711	(PIMA)	(09/01/2015-08/17/2016)
3062 N PRESIDIO PARK PL, TUCSON, AZ 85716	(PIMA)	(09/01/2014-12/31/2014)
3646 E BLACKLIDGE DR UNIT 3, TUCSON, AZ 85716	(PIMA)	(09/01/2012-03/07/2016)
2738 N RICHEY BLVD, TUCSON, AZ 85716	(PIMA)	(11/01/2011-12/31/2011)
34 NACE AVE, OAKLAND, CA 94611	(ALAMEDA)	(09/01/2006-04/26/2014)
125 JORDAN S APT 1, BLOOMINGTON, IN 47406	(MONROE)	(10/01/2004-12/31/2004)
155 VALLEY FRG, NASHVILLE, TN 37205	(DAVIDSON)	(02/01/2019)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: Yes **Motor Vehicles:** Yes **Employment:** No

PAUL MAGYAR

Alias(es)

PAUL MAGYAR
PAUL L MAGYAR
PAUL LAWRENCE MAGYAR

DOB(s)

09/XX/1978 (43)

Last Seen Email Address:

PLMAT2011@GMAIL.COM

SSN(s)

045-70-XXXX

Issued in Connecticut, 1980

Top Phones

Phone	Type	Last Seen	Provider
617-359-1648	Cellular	02/10/2021	SPRINT SPECTRUM L.P.
212-242-8656	Residential	12/08/2020	VERIZON NEW YORK INC
203-324-0793	Residential	07/01/2020	FRONTIER COMM - CT

Address (County/Parish/Borough) History:

54 VAN DYKE ST, BROOKLYN, NY 11231	(KINGS)	(07/01/2020-Current)
220 WATER ST APT 132, BROOKLYN, NY 11201	(KINGS)	(07/01/2014-04/25/2020)
240 E 27TH ST APT 20A, NEW YORK, NY 10016	(NEW YORK)	(08/01/2012-10/25/2014)
203 RIVINGTON ST APT 2P, NEW YORK, NY 10002	(NEW YORK)	(05/17/2009-12/31/2010)
340 W 17TH ST APT 4C, NEW YORK, NY 10011	(NEW YORK)	(06/01/2004-05/30/2009)
32 GARRISON ST APT 40202, BOSTON, MA 02116	(SUFFOLK)	(06/01/2002-12/31/2003)
458 1ST ST APT 4F, BROOKLYN, NY 11215	(KINGS)	(10/25/2000-12/31/2001)
120 HOBSON ST, STAMFORD, CT 06902	(FAIRFIELD)	(04/01/2000-12/31/2013)
6511 MAYFLOWER HL, WATERVILLE, ME 04901	(KENNEBEC)	(05/01/1998)
TWO PINE POINT, LLOYD HARBOR, NY 11743	(SUFFOLK)	(03/01/1997-12/31/1997)
2 PINE PT, HUNTINGTON, NY 11743	(SUFFOLK)	(12/05/1996-12/31/1999)
6511 COLBY COLLEGE, WATERVILLE, ME 04901	(KENNEBEC)	(11/01/1996-12/25/2001)
123 HARBOR DR APT 203, STAMFORD, CT 06902	(FAIRFIELD)	(11/01/1996-07/09/1999)
555 W 18TH ST, NEW YORK, NY 10011	(NEW YORK)	(02/15/2004)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** No

D ELAINE W MANDELL

Alias(es)

ELAINE W MANDELL

DOB(s)

08/XX/1936 (85)

ELAINE MANDELL
ELAINE W MADELL

DOD(s)
07/30/2008
Last Seen Email Address:
EMANDELL@WEBTV.NET

SSN(s)

169-30-XXXX

Issued in Pennsylvania, 1953-1955

169-24-XXXX

Issued in Pennsylvania, 1936-1950

Top Phones

Phone	Type	Last Seen	Provider
203-625-6160	Residential	01/28/2006	VERIZON NEW YORK INC
203-625-2616	Residential	01/01/2005	VERIZON NEW YORK INC
203-625-2618	Residential	07/26/2008	VERIZON NEW YORK INC

Address (County/Parish/Borough) History:

PO BOX 93, MOUNTAINVILLE, NY 10953	(ORANGE)	(01/01/2005-Current)
79 PLEASANT HILL RD, MOUNTAINVILLE, NY 10953	(ORANGE)	(08/29/2009-12/31/2010)
2200 BENJAMIN FRANKLIN PKWY APT S411, PHILADELPHIA, PA 19130	(PHILADELPHIA)	(11/08/2008-08/28/2021)
30 BROOKSIDE DR APT 1H, GREENWICH, CT 06830	(FAIRFIELD)	(05/01/2002-07/30/2008)
PO BOX 125, MOUNTAINVILLE, NY 10953	(ORANGE)	(02/01/1997-07/30/2008)
101 LEWIS ST APT K, GREENWICH, CT 06830	(FAIRFIELD)	(10/01/1994-12/31/2001)
208 PALMER LANDING APT 208, STAMFORD, CT 06902	(FAIRFIELD)	(12/01/1986-12/31/1993)
123 HARBOR DR APT 208, STAMFORD, CT 06902	(FAIRFIELD)	(09/01/1986-07/16/2001)
34 LOCUST RED BARN APT J1, RYE, NY 10580	(WESTCHESTER)	(12/31/1985-12/31/1991)
45 DEARBORN AVE, RYE, NY 10580	(WESTCHESTER)	(07/01/1985-12/31/1986)
720 MILTON RD, RYE, NY 10580	(WESTCHESTER)	(12/31/1983-12/31/1993)
3 DEERFIELD LN, MAMARONECK, NY 10543	(WESTCHESTER)	(12/31/1983-12/31/1987)
79 PUTNAM PARK, GREENWICH, CT 06830	(FAIRFIELD)	(10/01/1974-09/01/1991)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** Yes

Properties: No **Motor Vehicles:** No **Employment:** Yes

MARK P MCCARTY

Alias(es)

MARK P MCCARTY
MARK P MC CARTY
MARK MCCARTY
MARK R MCCARTY

DOB(s)

11/13/1952 (68)

Last Seen Email Address:

None Found

SSN(s)

483-72-XXXX

Issued in Iowa, 1969

Top Phones

Phone	Type	Last Seen	Provider
520-730-5612	Cellular	02/13/2018	VERIZON WIRELESS-AZ
520-748-7609	Residential	01/19/2012	QWEST CORPORATION
520-720-5612	Residential	12/19/2011	QWEST CORPORATION

Address (County/Parish/Borough) History:

2022 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(04/06/1981-Current)
1221 N SYCAMORE BLVD UNIT 2, TUCSON, AZ 85712	(PIMA)	(10/01/2010-10/12/2011)
3737 N COUNTRY CLUB RD APT 205S, TUCSON, AZ 85716	(PIMA)	(03/28/2003-12/31/2009)
320 W ALTURAS ST, TUCSON, AZ 85705	(PIMA)	(12/01/2001-04/26/2008)
1821 E BROADWAY BLVD, TUCSON, AZ 85719	(PIMA)	(08/01/2001-12/31/2001)
COUNTY ROAD TITLE SECURITY, TUCSON AZ, AZ 85732	(PIMA)	(03/09/1999)
2423 W DA, COLORADO SPRINGS, CO 80904	(EL PASO)	(12/31/1993)
380 E UNIVERSITY BLVD, TUCSON, AZ 85705	(PIMA)	(09/01/1991-12/31/2000)
PO BOX 12947, TUCSON, AZ 85732	(PIMA)	(07/01/1988-12/31/1990)
4131 E BRYANT PL, TUCSON, AZ 85711	(PIMA)	(04/01/1980-04/26/2021)
2454 E 36TH ST, TUCSON, AZ 85713	(PIMA)	(10/25/1979-02/19/2021)
2452 E 36TH ST, TUCSON, AZ 85713	(PIMA)	(10/25/1979-04/26/2021)
2444 E 36TH ST, TUCSON, AZ 85713	(PIMA)	(10/25/1979-02/19/2021)
2442 E 36TH ST, TUCSON, AZ 85713	(PIMA)	(10/25/1979-04/26/2021)
4620 E MONTECITO ST, TUCSON, AZ 85711	(PIMA)	(09/25/1978-02/19/2021)
4618 E MONTECITO ST, TUCSON, AZ 85711	(PIMA)	(09/25/1978-04/26/2021)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** Yes **Business Affiliations:** Yes

Properties: Yes **Motor Vehicles:** Yes **Employment:** Yes

RITA M MCCARTY

Alias(es)

RITA M MCCARTY

Last Seen Email Address:

None Found

Top Phones

No Phone Data

Address (County/Parish/Borough) History:

2022 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(11/06/2014-Current)
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Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: Yes **Motor Vehicles:** No **Employment:** No

D GEORGE J NABER

Alias(es)

GEORGE J NABER
 GEORGE J TTEE
 J NABER GEORGE
 GEORGE J CHASTAIN
 GEORGE J NABAT
 GEORGE NABER
 GEORGE CHASTAIN

DOB(s)

04/XX/1919 (102)

DOD(s)

06/08/2014

Last Seen Email Address:

J.ASONEVANS102@GMAIL.COM

SSN(s)

395-09-XXXX

Issued in Wisconsin, 1936-1950

Top Phones

Phone	Type	Last Seen	Provider
520-326-8868	Residential	05/15/2018	QWEST CORPORATION
520-971-1308	Cellular	08/23/2018	SPRINT SPECTRUM L.P.

Address (County/Parish/Borough) History:

2001 W RUDASILL RD APT 5301, TUCSON, AZ 85704	(PIMA)	(12/31/2004-Current)
5830 N FOUNTAINS AVE APT 332, TUCSON, AZ 85704	(PIMA)	(07/19/2014)
3248 N MILL AVE, TUCSON, AZ 85712	(PIMA)	(05/25/2001-06/08/2014)
2718 N EASTGATE DR, TUCSON, AZ 85712	(PIMA)	(09/01/1992-12/31/1996)
2032 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(04/01/1980-12/31/2001)
1659 N RICHEY BLVD, TUCSON, AZ 85716	(PIMA)	

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: Yes **Motor Vehicles:** Yes **Employment:** No

EMILY C NOLAN

Alias(es)

EMILY C NOLAN
EMILY CHARLOTTE NOLAN
EMILY NOLAN

DOB(s)

08/15/1988 (33)

Last Seen Email Address:

None Found

SSN(s)

035-60-XXXX

Issued in Rhode Island, 1988-1992

Top Phones

Phone	Type	Last Seen	Provider
401-965-0412	Cellular	08/23/2021	NEW CINGULAR WRLS DC
520-618-1630	Residential	07/02/2013	LEVEL3 TELECOM OF AZ
401-743-0259	Cellular	07/01/2016	NEW CINGULAR WRLS DC

Address (County/Parish/Borough) History:

2102 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(09/01/2016-Current)
4625 E 8TH ST, TUCSON, AZ 85711	(PIMA)	(09/01/2015-10/29/2016)
3062 N PRESIDIO PARK PL, TUCSON, AZ 85716	(PIMA)	(09/10/2014-08/19/2020)
3121 N SWAN RD APT 265, TUCSON, AZ 85712	(PIMA)	(04/26/2013-05/20/2016)
3220 W INA RD APT 15206, TUCSON, AZ 85741	(PIMA)	(05/01/2012-12/31/2012)
2738 N RICHEY BLVD, TUCSON, AZ 85716	(PIMA)	(08/01/2011-12/31/2012)
6450 E GOLF LINKS RD APT 1020, TUCSON, AZ 85730	(PIMA)	(10/01/2010-12/31/2010)
126 BUCKLEY S, STORRS, CT 06269	(TOLLAND)	(11/09/2006)
2 N WINNISQUAM DR, WARWICK, RI 02886	(KENT)	(08/01/2006-12/31/2010)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** Yes **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** No

AGUSTIN TEMPORINIAHUMADA

Alias(es)

AGUSTIN TEMPORINIAHUMADA
AGUSTIN TEMPORINI

DOB(s)

02/XX/1994 (27)

AGUSTIN TEMPORINI AHUMADA
AGUSTIN AGUSTIN TEMPORINI AHUMADA
A TEMPORINI AHUMADA

Last Seen Email Address:
None Found

SSN(s)

765-44-XXXX

Issued in Arizona, 2004

Top Phones

Phone	Type	Last Seen	Provider
520-954-2992	Cellular	02/12/2019	VERIZON WIRELESS-AZ

Address (County/Parish/Borough) History:

13675 COURSEY BLVD APT 317, BATON ROUGE, LA 70817	(EAST BATON ROUGE)	(03/01/2020-Current)
313 NE 2ND ST APT 605, FORT LAUDERDALE, FL 33301	(BROWARD)	(08/20/2019)
12901 JEFFERSON HWY APT 731, BATON ROUGE, LA 70816	(EAST BATON ROUGE)	(06/21/2018-10/31/2020)
315 NE 3RD AVE APT 906, FORT LAUDERDALE, FL 33301	(BROWARD)	(04/21/2018)
4900 E 5TH ST APT 1922, TUCSON, AZ 85711	(PIMA)	(11/05/2016-10/27/2018)
1641 ZENITH WAY, FORT LAUDERDALE, FL 33327	(BROWARD)	(10/01/2016-03/01/2021)
2102 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(08/01/2013-03/01/2021)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** No

AMY L TRUONG

Alias(es)

AMY L TRUONG

AMY TRUONG

AMY LUNA

AMY TRUANG

AMY LUNA TROUNG

LUNA AMIE

AMIE TRUONG

DOB(s)

10/XX/1975 (46)

10/XX/1955 (66)

Last Seen Email Address:

RKENWARD@COMCAST.NET

SSN(s)

527-95-XXXX

Issued in Arizona, 1982

Top Phones

Phone	Type	Last Seen	Provider
520-484-0391	Cellular	03/28/2020	SPRINT SPECTRUM L.P.
949-910-6688	Cellular	06/12/2018	T-MOBILE USA INC.
714-391-4999	Cellular	02/07/2012	T-MOBILE USA INC.

Address (County/Parish/Borough) History:

4234 E MONTE VISTA DR UNIT 2, TUCSON, AZ 85712	(PIMA)	(10/01/2020-Current)
2875 N TUCSON BLVD APT 37, TUCSON, AZ 85716	(PIMA)	(03/01/2019-03/01/2021)
2032 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(04/01/2017-10/27/2018)
3148 N COLUMBUS BLVD, TUCSON, AZ 85712	(PIMA)	(04/01/2016-10/29/2016)
4310 E ALLISON RD, TUCSON, AZ 85712	(PIMA)	(06/13/2015-10/31/2015)
4357 E 16TH ST, TUCSON, AZ 85711	(PIMA)	(09/19/2014-01/26/2015)

1510 N BELVEDERE AVE, TUCSON, AZ 85712	(PIMA)	(10/29/2013)
214 N MOUNTAIN VIEW AVE, TUCSON, AZ 85711	(PIMA)	(10/01/2012-12/31/2014)
9555 E SHILOH ST APT 8203, TUCSON, AZ 85748	(PIMA)	(10/01/2011-04/25/2015)
550 N HARRISON RD APT 1207, TUCSON, AZ 85748	(PIMA)	(04/01/2011-12/31/2011)
3907 LEAH HTS, COLORADO SPRINGS, CO 80906	(EL PASO)	(05/01/2009-12/25/2011)
35 GREENFIELD, IRVINE, CA 92614	(ORANGE)	(12/19/2005-12/31/2008)
2604 LUCILLE DR APT A, KILLEEN, TX 76549	(BELL)	(03/08/2004)
4200 JULY DR APT B, KILLEEN, TX 76549	(BELL)	(12/25/2002-12/25/2008)
1555 E 10TH ST, DOUGLAS, AZ 85607	(COCHISE)	(03/19/2001-04/25/2009)
1638 E 10TH ST, DOUGLAS, AZ 85607	(COCHISE)	(07/01/1998-03/01/2005)
2700 E 15TH ST APT 4, DOUGLAS, AZ 85607	(COCHISE)	(11/01/1995-12/31/2002)
2700 FIFTEEN, DOUGLAS, AZ 85607	(COCHISE)	(11/01/1995-12/31/1995)
1192 E 7TH ST, DOUGLAS, AZ 85607	(COCHISE)	(05/11/1995-03/01/2021)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** No

SHANDRU VALENZUELA

Alias(es)

SHANDRU VALENZUELA
VALENZUELA SHANDRU
SANDRA VALENZUELA
SHONDRU VALENZUELA
SHANDRU VALENZULA
SHANDRA VALENZUELA
SHAN VALENZUELA

DOB(s)

09/01/1982 (39)

Last Seen Email Address:

None Found

SSN(s)

573-71-XXXX

Issued in California, 1982

Top Phones

Phone	Type	Last Seen	Provider
720-454-8247	Cellular	07/04/2021	NEW CINGULAR WIRELESS
720-361-6162	Cellular	02/04/2015	NEW CINGULAR WIRELESS
520-982-0631	Cellular	04/06/2009	SPRINT SPECTRUM L.P.

Address (County/Parish/Borough) History:

2032 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(04/29/2019-Current)
1332 E HEDRICK DR, TUCSON, AZ 85719	(PIMA)	(07/04/2021-08/28/2021)
4100 N ROMERO RD LOT 25, TUCSON, AZ 85705	(PIMA)	(06/13/2021)
10951 E GARDEN DR APT 312, AURORA, CO 80012	(ARAPAHOE)	(02/20/2017-09/08/2020)
1105 BACCHUS DR APT E, LAFAYETTE, CO 80026	(BOULDER)	(01/07/2016-10/28/2017)
51 21ST AVE APT 31, LONGMONT, CO 80501	(BOULDER)	(02/26/2015-04/29/2017)
3314 S 16TH AVE, TUCSON, AZ 85713	(PIMA)	(12/01/2014)
1209 CENTAUR CIR APT A, LAFAYETTE, CO 80026	(BOULDER)	(03/24/2012-02/20/2017)
1415 S TYNDALL AVE, TUCSON, AZ 85713	(PIMA)	(11/01/2007-03/01/2009)
224 W RAGA, TUCSON, AZ 85716	(PIMA)	(04/30/2007)
7671 E TANQUE VERDE RD APT 630, TUCSON, AZ 85715	(PIMA)	(07/01/2006-04/26/2014)
6516 E STELLA RD APT X, TUCSON, AZ 85730	(PIMA)	(01/01/2005-02/05/2005)

3122 N WINSTEL BLVD UNIT A, TUCSON, AZ 85716	(PIMA)	(12/31/2004-03/01/2009)
3431 S KOLB RD, TUCSON, AZ 85730	(PIMA)	(03/10/2004)
224 W ROGER RD UNIT 1, TUCSON, AZ 85705	(PIMA)	(01/20/2004-12/31/2004)
2323 W CHANNING ST, WEST COVINA, CA 91790	(LOS ANGELES)	(06/10/2002-12/31/2005)
7001 E GOLF LINKS RD APT 104, TUCSON, AZ 85730	(PIMA)	(06/01/2000-12/01/2018)
737 N ALVERNON WAY, TUCSON, AZ 85711	(PIMA)	(06/01/2000-12/31/2003)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** Yes **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** Yes

COURTNEY M WHITLEY

Alias(es)

COURTNEY M WHITLEY
 COURTNEY WHITLEY
 COURTNEY MAYE WHITLEY
 COURTNEY M LABUKAS
 COURTNEY MAYE LABUKAS
 WHITLEY COURTNEY
 COURTNEY LABUKAS
 COURTNE LABUKAS
 COUTNEY WHITLEY

DOB(s)

01/07/1979 (42)

Last Seen Email Address:

COLETTE@LONGREALTY.COM

SSN(s)

527-95-XXXX

Issued in Arizona, 1982

Top Phones

Phone	Type	Last Seen	Provider
520-312-0244	Cellular	02/09/2018	NEW CINGULAR WIRLESS
520-273-2836	Cellular	04/09/2016	METROPCS, INC.
520-881-0810	Residential	12/04/2020	QWEST CORPORATION

Address (County/Parish/Borough) History:

2607 N MARTIN AVE UNIT 1, TUCSON, AZ 85719	(PIMA)	(02/01/1997-Current)
3700 N CAMPBELL AVE APT 810, TUCSON, AZ 85719	(PIMA)	(07/06/2019-12/14/2020)
5353 E 22ND ST APT 808, TUCSON, AZ 85711	(PIMA)	(12/28/2017-03/01/2021)
2032 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(06/01/2009-10/28/2017)
3231 E BLACKLIDGE DR, TUCSON, AZ 85716	(PIMA)	(01/01/2009-12/31/2009)
4461 E CALADIUM PL, TUCSON, AZ 85712	(PIMA)	(02/01/2007-12/31/2008)
7522 E PT NINCI DR, TUSCON, AZ 85730	(PIMA)	(12/16/2004)
7522 E POINCIANA DR, TUCSON, AZ 85730	(PIMA)	(08/27/2004-03/01/2007)
2943 E 17TH ST, TUCSON, AZ 85716	(PIMA)	(07/18/2002-12/31/2004)
1001 W SAINT MARYS RD APT 316, TUCSON, AZ 85745	(PIMA)	(08/06/2001-03/01/2007)
PO BOX 65866, TUCSON, AZ 85728	(PIMA)	(07/01/2001)
7212 E LUANA PL, TUCSON, AZ 85710	(PIMA)	(02/01/2001-12/31/2002)
6110 E 5TH ST APT 302, TUCSON, AZ 85711	(PIMA)	(11/01/1999-06/01/2007)
2769 N MARTIN AVE UNIT 2, TUCSON, AZ 85719	(PIMA)	(07/01/1999-08/01/1999)
PO BOX 7847, FLAGSTAFF, AZ 86011	(COCONINO)	(06/01/1999-01/27/2002)
4535 N OSAGE DR, TUCSON, AZ 85718	(PIMA)	(06/01/1997)
502 N SILVERBELL RD, TUCSON, AZ 85745	(PIMA)	

2107 S MARCH PL, TUCSON, AZ 85713

(PIMA)

(06/21/2012)

Bankruptcies: No **Liens:** No **Judgments:** Yes **Possible Criminal/Infractions:** Yes **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** No

EMERSON T WHITLEY

Alias(es)

EMERSON T WHITLEY
EVERSON T WHITLEY
EMERSON WHITLEY
EMERSON E WHITLEY

DOB(s)

10/XX/1976 (45)

Last Seen Email Address:

None Found

SSN(s)

527-95-XXXX

Issued in Arizona, 1982

Top Phones

Phone	Type	Last Seen	Provider
415-759-5264	Residential	09/01/2021	PACIFIC BELL
415-834-5577	Residential	03/02/2011	COMCAST IP PHONE LLC
415-923-3750	Residential	11/01/2009	PACIFIC BELL

Address (County/Parish/Borough) History:

125 SANTA PAULA AVE, SAN FRANCISCO, CA 94127	(SAN FRANCISCO)	(11/01/2009-Current)
2032 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(05/29/2009-02/06/2017)
451 KANSAS ST UNIT 428, SAN FRANCISCO, CA 94107	(SAN FRANCISCO)	(06/01/2008-05/30/2009)
415 MISSISSIPPI ST, SAN FRANCISCO, CA 94107	(SAN FRANCISCO)	(08/01/2006-04/26/2008)
1151 WASHINGTON ST, SAN FRANCISCO, CA 94108	(SAN FRANCISCO)	(08/01/2003-08/01/2006)
40 E 52ND ST, NEW YORK, NY 10022	(NEW YORK)	(04/29/2003)
343 SANSOME ST STE 1210, SAN FRANCISCO, CA 94104	(SAN FRANCISCO)	(08/01/2002-09/01/2008)
1165 BAY ST APT 7, SAN FRANCISCO, CA 94123	(SAN FRANCISCO)	(07/01/2002-12/31/2002)
162 W 80TH ST APT 2G, NEW YORK, NY 10024	(NEW YORK)	(07/01/2000-12/31/2001)
PO BOX 205953, NEW HAVEN, CT 06520	(NEW HAVEN)	(10/15/1997)
342 ELM ST, NEW HAVEN, CT 06511	(NEW HAVEN)	(12/31/1996-12/31/1999)
PO BOX 204699, NEW HAVEN, CT 06520	(NEW HAVEN)	(12/31/1994-12/31/1996)
18 CORNELIA ST, NEW YORK, NY 10014	(NEW YORK)	(12/01/1994)
2607 N MARTIN AVE UNIT 2, TUCSON, AZ 85719	(PIMA)	(10/23/1994-07/01/2000)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** Yes

Properties: Yes **Motor Vehicles:** No **Employment:** Yes

Business

None Found

Professional License

None Found



Comprehensive Report prepared for Adam and Eve Investigations on October 11, 2021

ALEXANDER D COOPER

IDI is not a "consumer reporting agency" and its services, including this report, do not constitute "consumer reports," as these terms are defined by the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. ("FCRA"). IDI services, including this report, may not be used in whole or in part as a factor in establishing an individual's eligibility for credit, insurance, employment nor for any other purpose under the FCRA.

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Subject Information

ALEXANDER D COOPER

519-13-XXXX

09/27/1967

AGE: 54

Alias(es)

ALEXANDER D COOPER

ALEXANDER COOPER

ALEXANDER DAVID COOPER

ALEXANDER DAVID COPPER

ALEXANDER E COOPER

ALEX COOPER

ALEX D COOPER

SSN(s)

519-13-XXXX

Issued in Idaho, 1985

DOB(s)

09/27/1967 (54)

Reported Current Address:

2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA) (05/25/2001-09/24/2021)

Bankruptcies: None Found

Motor Vehicles: Yes

Properties: Yes

Employment: None Found

Liens: None Found

Judgments: None Found

Foreclosures: None Found

Possible Criminal/Infractions: Yes

Business Affiliations: None Found

Professional License: None Found

Report Summary

Possible Criminal/Infractions	2 Found
Deceased Report	None Found
City History	11 Found
County History	11 Found
Address Summary	11 Found
Phones	6 Found
Emails	2 Found
IP Addresses	2 Found
Possible Employers	None Found
Bankruptcies	None Found
Liens	None Found
Judgments	None Found
Properties	3 Found
Foreclosures	None Found
Motor Vehicles	5 Found
Aircraft	None Found
Possible Relatives	4 Found
Possible Relative Details	4 Found
Possible Associates	21 Found
Possible Associates Details	21 Found
Business	None Found
Professional License	None Found

Possible Criminal/Infractions

2 Found

IMPORTANT: Due to varying quality of source data, records displayed may not pertain to your subject. Independent verification of data displayed is highly recommended.
Criminal/Infraction results in a Comprehensive Report may be limited due to strict matching logic . For broader results, a separate Criminal/Infraction Search is highly recommended.

Category: CRIMINAL/INFRACTION

ALEX COOPER
DOB:
09/27/1967 (54)
Gender:
Race:
Hair:
Eyes:
Height:
Weight:
Skin Tone:
Body Build:

Source: AZ PIMA JUSTICE TRAFFIC COURT

Case Number: TR11-032541A

Offense Code: 28-701A.13.SO

Source State: AZ

Charges Filed:

Conviction Date:

Offense Date: 07/15/2011

Case Type: CIVIL TICKET

Description: SPEED 13 MILES OVER

Disposition (date): DISMISSED 11/27/2011

Court: PIMA JUSTICE TRAFFIC

County or Jurisdiction: PIMA

DL Number: AZ-B10737452

Category: CRIMINAL/INFRACTION

ALEXANDER DAVID COOPER
DOB:
09/27/1967 (54)
Gender:
Race:
Hair:
Eyes:
Height:
Weight:
Skin Tone:
Body Build:

Source: AZ PIMA JUSTICE TRAFFIC COURT

Case Number: TR08-022942A

Offense Code: 28-701A.1

Source State: AZ

Charges Filed:

Conviction Date:

Offense Date: 06/21/2008 OVER

Case Type: CIVIL TICKET

Description: SPEEDING 1-10

Disposition (date): 07/18/2008

Court: PIMA JUSTICE TRAFFIC

County or Jurisdiction: PIMA

DL Number: AZ-B10737452

Comments: ADDITIONAL CASE INFORMATION: PLEAD
RESP

Deceased Report

None Found

City History

11 Found

TUCSON, AZ	(05/25/2001-Current)
ARLINGTON, VT	(06/01/2010)
TUCSON, AZ	(03/19/1999-05/25/2001)
TUCSON, AZ	(12/01/1998-01/01/1999)
BIRMINGHAM, AL	(07/01/1996-12/31/1996)
TUCSON, AZ	(06/28/1995-12/31/1996)
TUCSON, AZ	(07/01/1993-06/28/1995)
TUCSON, AZ	(04/01/1991-12/31/1992)
STAMFORD, CT	(10/01/1990-06/28/1995)
TUCSON, AZ	(10/01/1990-12/31/1990)
SUMMIT, NJ	(05/01/1988-12/31/1989)

PIMA, AZ	(05/25/2001-Current)
BENNINGTON, VT	(06/01/2010)
PIMA, AZ	(03/19/1999-05/25/2001)
PIMA, AZ	(12/01/1998-01/01/1999)
JEFFERSON, AL	(07/01/1996-12/31/1996)
PIMA, AZ	(06/28/1995-12/31/1996)
PIMA, AZ	(07/01/1993-06/28/1995)
PIMA, AZ	(04/01/1991-12/31/1992)
FAIRFIELD, CT	(10/01/1990-06/28/1995)
PIMA, AZ	(10/01/1990-12/31/1990)
UNION, NJ	(05/01/1988-12/31/1989)

Address Summary

11 Found

2032 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(05/25/2001-Current)
1308 E ARLINGTON RD, ARLINGTON, VT 05250	(BENNINGTON)	(06/01/2010)
2153 N EDISON TER, TUCSON, AZ 85716	(PIMA)	(03/19/1999-05/25/2001)
301 N OLSEN AVE, TUCSON, AZ 85719	(PIMA)	(12/01/1998-01/01/1999)
1127 23RD ST S APT F2, BIRMINGHAM, AL 35205	(JEFFERSON)	(07/01/1996-12/31/1996)
2835 E FLORENCE DR, TUCSON, AZ 85716	(PIMA)	(06/28/1995-12/31/1996)
1615 N TYNDALL AVE, TUCSON, AZ 85719	(PIMA)	(07/01/1993-06/28/1995)
1347 N EUCLID AVE, TUCSON, AZ 85719	(PIMA)	(04/01/1991-12/31/1992)
123 HARBOR DR APT 203, STAMFORD, CT 06902	(FAIRFIELD)	(10/01/1990-06/28/1995)
455 W KELSO ST APT 203, TUCSON, AZ 85705	(PIMA)	(10/01/1990-12/31/1990)
250 SUMMIT AVE, SUMMIT, NJ 07901	(UNION)	(05/01/1988-12/31/1989)

Phones

6 Found

Phone	Type	Last Seen	Provider
857-214-9703	Cellular	07/15/2021	VERIZON WIRELESS-MA
520-829-1034	Residential	07/27/2011	LEVEL 3 COMM - AZ
520-748-5233	Residential	12/28/2009	QWEST CORPORATION
520-319-8708	Residential	05/30/2009	QWEST CORPORATION
520-792-8955	Residential	03/05/1999	QWEST CORPORATION
281-498-2704	Residential	10/26/2019	SOUTHWESTERN BELL

Emails

2 Found

Possible Emails:

ADCOOPER@EARTHLINK.NET
ALEXANDERCOOPER@JUNO.COM

Last Seen:

12/15/2007

IP Addresses

2 Found

IP Address:

160.39.190.133

64.39.28.54

Last Seen:

12/15/2007

Possible Employers	None Found
--------------------	------------

Bankruptcies	None Found
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Liens	None Found
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Judgments	None Found
-----------	------------

Properties	3 Found
------------	---------

2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)

Current Owners: WHITLEY-SCHARSCHMIDT (WHITLEY-SCHARSCHMIDT FAMILY) **Latest Assessment:** 04/26/2021
Assessed: 2020 - \$15,941

Relationship: TRUST

Mail: 125 SANTA PAULA AVE, SAN FRANCISCO, CA, 94127

Tax: 2020 - \$2,359

Total Value: \$173,360

Land Value: \$0

Improvement Value: \$0

Size (sqft): Bdlg: 1416 Lot: 0

Municipality: PIMA

Municipality Code: 019

Parcel Number: 112052130

Subdivision: SHAHEEN ESTATES

Legal Description: SHAHEEN ESTATES LOT 5 BLK 4

Year Built: 1959

Use: SINGLE FAMILY RESIDENCE

Prior Transaction History

Date: 01/13/2017

Transaction: RESALE

Doc Type: QUITCLAIM

Doc Number: 370237

Grantor: EMERSON T WHITLEY (WHITLEY,EMERSON T)

Arms Length: No

Quit Claim: Yes

Filing Date: 02/06/2017

Date: 02/13/2015

Transaction: REFINANCE OR EQUITY

Mortgage Details

Amount: \$148,500

Loan Doc Number: 0000720039

Lender: EVERBANK

Doc Type: DEED OF TRUST

Doc Number: 720039

Borrower: EMERSON T WHITLEY (WHITLEY,EMERSON T) **Lender Type:** BANK

Quit Claim: No

Filing Date: 03/13/2015

Date: 05/20/2009

Transaction: RESALE

Sales Price: \$205,000

Mortgage Details

Amount: \$164,000

Loan Doc Number: 13568-0718

Lender: AMTRUST BANK

Doc Type: GRANT DEED

Doc Number: 13568-0711

Buyer: EMERSON T WHITLEY (WHITLEY,EMERSON T) **Lender Type:** BANK

Interest Rate Type: FIXED

Seller: ALEXANDER D COOPER, COURTNEY A
COOPER (COOPER,ALEXANDER D & COURTNEY A)
Arms Length: Yes
Quit Claim: No
Filing Date: 05/29/2009

Date: 02/27/2007
Transaction: REFINANCE OR EQUITY

Doc Type: DEED OF TRUST
Doc Number: 13009-4277
Borrower: ALEXANDER D COOPER, COURTNEY A
COOPER (COOPER,ALEXANDER D & COURTNEY A)
Quit Claim: No
Filing Date: 03/12/2007

Mortgage Details
Amount: \$42,000
Loan Doc Number: 13009-4277
Lender: FIRST HORIZON HOME LOAN CORP

Lender Type: FUNDING/FINANCE COMPANY
Interest Rate Type: FIXED

Date: 12/13/2004
Transaction: REFINANCE OR EQUITY

Doc Type: DEED OF TRUST
Doc Number: 12447-1256
Borrower: ALEXANDER D COOPER, COURTNEY A
COOPER (COOPER,ALEXANDER D & COURTNEY A)
Quit Claim: No
Filing Date: 12/13/2004

Mortgage Details
Amount: \$157,000
Loan Doc Number: 12447-1256
Lender: WASHINGTON MUTUAL FSB

Lender Type: BANK
Interest Rate Type: FIXED

Date: 06/11/2003
Transaction: REFINANCE OR EQUITY

Doc Type: DEED OF TRUST
Doc Number: 12069-1122
Borrower: ALEXANDER D COOPER, COURTNEY A
COOPER (COOPER,ALEXANDER D & COURTNEY A)
Quit Claim: No
Filing Date: 06/11/2003

Mortgage Details
Amount: \$25,000
Lender: BANK ONE NA

Lender Type: BANK
Interest Rate Type: FIXED
Lender Credit Line: LINE OF CREDIT

Date: 05/25/2001
Transaction: RESALE
Sales Price: \$139,900

Doc Type: GRANT DEED
Doc Number: 11557-1604
Buyer: ALEXANDER D COOPER, COURTNEY A
COOPER (COOPER,ALEXANDER D & COURTNEY A)
Seller: NABER (NABER)
Arms Length: Yes
Quit Claim: No
Filing Date: 05/25/2001

Mortgage Details
Amount: \$132,900
Loan Doc Number: 11557-1605
Lender: CHARTER FUNDING CORP

Lender Type: FUNDING/FINANCE COMPANY
Interest Rate Type: FIXED

Date: 06/03/1993
Transaction: RESALE

Doc Type: QUITCLAIM
Grantee: NABER (NABER)
Arms Length: No
Quit Claim: Yes
Filing Date: 06/03/1993

Mortgage Details
Amount: \$0
Lender: NO NEW MTG

2153 N EDISON TER, TUCSON, AZ, 85716 (PIMA)

Current Owners: LILY ANN ELIZABETH STEVENS
(STEVENS,LILY ANN ELIZABETH)
Purchased: 03/13/2019 - \$168,000

Municipality: PIMA
Municipality Code: 019
Parcel Number: 122150020
Subdivision: APPELYARD ADD
Legal Description: APPELYARD LOT 2
Year Built: 1963
Use: SINGLE FAMILY RESIDENCE

Current Owner Transaction History

Date: 03/13/2019
Transaction: RESALE
Sales Price: \$168,000

Doc Type: WARRANTY DEED
Doc Number: 880817
Buyer: LILY A STEVENS (STEVENS,LILY A E)
Seller: REGINA M MARTIN (MARTIN,REGINA M)
Arms Length: Yes
Quit Claim: No
Filing Date: 03/29/2019

Prior Transaction History

Date: 10/21/2005
Transaction: REFINANCE OR EQUITY

Doc Type: DEED OF TRUST
Doc Number: 12670-3284
Borrower: REGINA M MARTIN (MARTIN,REGINA M)
Quit Claim: No
Filing Date: 10/31/2005

Latest Assessment: 04/26/2021
Assessed: 2020 - \$13,644

Tax: 2020 - \$1,769

Total Value: \$146,476
Land Value: \$0
Improvement Value: \$0
Size (sqft): Bdlg: 1218 Lot: 7710

Mortgage Details

Amount: \$18,000
Loan Doc Number: 12670-3284
Lender: SIERRA PACIFIC MORTGAGE SVCS

Lender Type: MORTGAGE COMPANY
Interest Rate Type: FIXED

Date: 10/21/2005
Transaction: REFINANCE OR EQUITY

Doc Type: DEED OF TRUST
Doc Number: 12670-3266
Borrower: REGINA M MARTIN (MARTIN,REGINA M)
Quit Claim: No
Filing Date: 10/31/2005

Mortgage Details

Amount: \$144,000
Loan Doc Number: 12670-3266
Lender: SIERRA PACIFIC MORTGAGE SVCS

Lender Type: MORTGAGE COMPANY
Interest Rate Type: VARIABLE

Date: 10/??/2004
Transaction: RESALE
Sales Price: \$157,500

Doc Type: WARRANTY DEED
Doc Number: 12439-4296
Buyer: REGINA M MARTIN (MARTIN,REGINA M)
Seller: LINO CARRASCO (CARRASCO,LINO III)
Quit Claim: No
Filing Date: 12/01/2004

Mortgage Details

Amount: \$126,000
Loan Doc Number: 12439-4298
Lender: RBC MORTGAGE CO

Lender Type: MORTGAGE COMPANY
Interest Rate Type: VARIABLE

Mortgage Details

Amount: \$31,500
Loan Doc Number: 12439-4317
Lender: AMERICA'S WHOLESALE LENDER

Lender Type: FUNDING/FINANCE COMPANY
Interest Rate Type: FIXED
Lender Credit Line: LINE OF CREDIT

Date: 05/25/2001
Transaction: RESALE
Sales Price: \$108,000

Doc Type: GRANT DEED
Doc Number: 11557-1712
Buyer: LINO CARRASCO (CARRASCO,LINO III)
Seller: ALEXANDER D COOPER, COURTNEY A COOPER (COOPER,ALEXANDER D & COURTNEY A)
Quit Claim: No
Filing Date: 05/25/2001

Mortgage Details
Amount: \$97,200
Loan Doc Number: 11557-1713
Lender: PINNACLE MORTGAGE

Lender Type: MORTGAGE COMPANY
Interest Rate Type: FIXED

Date: 03/19/1999
Transaction: RESALE
Sales Price: \$87,000

Doc Number: 11007-0820
Buyer: ALEXANDER D COOPER, COURTNEY A COOPER (COOPER,ALEXANDER D & COURTNEY A)
Seller: BEATRYCE STOCKMAN (STOCKMAN,BEATRYCE)
Quit Claim: No
Filing Date: 03/19/1999

Mortgage Details
Amount: \$86,861
Loan Source: FEDERAL HOUSING AUTHORITY (FHA)
Loan Doc Number: 11007-0821
Lender: CHARTER FUNDING CORP

Lender Type: FUNDING/FINANCE COMPANY
Interest Rate Type: FIXED

2835 E FLORENCE DR, TUCSON, AZ, 85716 (PIMA)

Current Owners: THOMAS J BLANCK, MARGUERITE L BLANCK (BLANCK,THOMAS J J & MARGUERITE L)
Relationship: COMMUNITY PROPERTY
Mail: 1311 BOLTON ST, BALTIMORE, MD, 21217

Latest Assessment: 04/26/2021
Assessed: 2020 - \$22,944

Tax: 2020 - \$3,396

Purchased: \$98,000

Total Value: \$249,334
Land Value: \$0
Improvement Value: \$0
Size (sqft): Bldg: 2143 Lot: 0

Municipality: PIMA
Municipality Code: 019
Parcel Number: 112043010
Subdivision: MIRAMONTE
Legal Description: MIRAMONTE LOT 7 BLK 2
Year Built: 1968
Use: SINGLE FAMILY RESIDENCE

Current Owner Transaction History

Date: 07/19/2010
Transaction: REFINANCE OR EQUITY

Mortgage Details
Amount: \$86,450
Loan Doc Number: 13870-1247
Lender: BANK OF AMERICA

Doc Type: DEED OF TRUST
Doc Number: 13870-1247
Borrower: THOMAS J BLANCK, MARGUERITE L BLANCK (BLANCK,THOMAS J & MARGUERITE L)
Quit Claim: No
Filing Date: 08/11/2010

Lender Type: BANK
Interest Rate Type: FIXED

Date: 05/31/2006
Transaction: REFINANCE OR EQUITY

Mortgage Details
Amount: \$245,000
Loan Doc Number: 12833-3639
Lender: EVERHOME MORTGAGE CO

Doc Type: DEED OF TRUST
Doc Number: 12833-3639
Borrower: THOMAS J BLANCK, MARGUERITE L BLANCK (BLANCK,THOMAS J & MARGUERITE L)
Quit Claim: No
Filing Date: 06/26/2006

Lender Type: MORTGAGE COMPANY
Interest Rate Type: FIXED

Date: 01/26/1999
Transaction: REFINANCE OR EQUITY

Doc Number: 10970-1132
Borrower: THOMAS J BLANCK, MARGUERITE L
BLANCK (BLANCK, THOMAS J & MARGUERITE L)
Quit Claim: No
Filing Date: 01/26/1999

Mortgage Details
Amount: \$88,643
Lender: PHH US MORTGAGE

Lender Type: MORTGAGE COMPANY
Interest Rate Type: FIXED

Date: 11/24/1997
Transaction: RESALE
Sales Price: \$98,000

Buyer: THOMAS J BLANCK, MARGUERITE L BLANCK
(BLANCK, THOMAS J & MARGUERITE L)
Seller: BLANCK ALEXANDER (ALEXANDER BLANCK)
Arms Length: No
Quit Claim: No
Filing Date: 11/24/1997

Mortgage Details
Amount: \$88,200
Lender: STEPHEN WOLF & CO

Lender Type: MORTGAGE ELECTRONIC
REGISTRATION SYSTEM (MERS)
Interest Rate Type: FIXED

Prior Transaction History

Date: 06/28/1995
Transaction: RESALE
Sales Price: \$89,000

Buyer: ALEXANDER D COOPER, COURTNEY A
COOPER (COOPER, ALEXANDER D & COURTNEY A)
Seller: D PETER, KAREN F PETER (PETER D & KAREN
F MORSE)
Arms Length: Yes
Quit Claim: No
Filing Date: 06/28/1995

Mortgage Details
Amount: \$61,400
Lender: SOURCE ONE MORTGAGE SVCS CORP

Lender Type: MORTGAGE COMPANY
Interest Rate Type: FIXED

Foreclosures

None Found

Motor Vehicles

5 Found



2002 HONDA CIVIC EX
VIN: 1HGES25762L021214
Vehicle Type: CAR
Original Title Date: 07/07/2002

Body Style: SEDAN 4D 4D 5P
Primary Color:
Weight:
Length: 174.6
Doors: 4
Drive Type: FWD

Registrant: NANCY LEA BRATT
Latest Plate: AEZ2388(AZ) (05/14/2009-06/30/2022)

City/State: TUCSON, AZ

Registrant: NANCY LEA BRATT(05/14/2009-Current)
Address: 2726 N RICHEY BLVD, TUCSON, AZ, 85716 (PIMA)
Owner: NANCY LEA BRATT(05/14/2009-07/01/2020)
Address: 2726 N RICHEY BLVD, TUCSON, AZ, 85716 (PIMA)

Latest MV Title: T217009134013
Title Transfer Date: 05/14/2009
Plate: AEZ2388 (AZ) (05/14/2009-06/30/2022)
Type: PRIVATE
Previous Plate: 314HRM (AZ)

Operator: ALEXANDER COOPER
Last Seen: (12/01/2008-11/14/2012)

City/State: TUCSON, AZ

Operator: ALEXANDER COOPER(12/01/2008-11/14/2012)
Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)

Registrants: ALEXANDER DAVID COOPER, COURTNEY ANNE COOPER
Latest Plate: 314HRM(AZ) (07/14/2005-06/30/2009)

City/State: TUCSON, AZ

Registrant: ALEXANDER DAVID COOPER(07/14/2005-06/27/2008)
Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)
Registrant: COURTNEY ANNE COOPER(07/14/2005-06/27/2008)
Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)
Owner: ALEXANDER DAVID COOPER(07/14/2005-06/27/2008)
Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)
Owner: COURTNEY ANNE COOPER(07/14/2005-06/27/2008)
Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)
Lien Holder: BANK OF AMERICA NA
Address: PO BOX 2759, JACKSONVILLE, FL, 32203 (DUVAL)
Lien Holder: WELLS FARGO BANK NA
Address: 12200 NORTHWEST FWY, HOUSTON, TX, 77092 (HARRIS)

Latest MV Title: 207W006102117
Title Transfer Date: 04/12/2006
Plate: 314HRM (AZ) (07/14/2005-06/30/2009)
Type: PRIVATE
Previous Plate: 165JKK (AZ)

Registrants: PETER A CHARTIER, PETER A CHARTIER
Latest Plate: 165JKK(AZ) (07/05/2002-06/30/2003)

City/State: ORO VALLEY, AZ

Registrant: PETER A CHARTIER
Address: 775 W CLEAR CREEK WAY, ORO VALLEY, AZ, 85737 (PIMA)
Registrant: PETER A CHARTIER
Address: 775 W CLEAR CREEK WAY, ORO VALLEY, AZ, 85737 (PIMA)
Owner: HONDA LEASE TRUST
Lien Holder: HONDA LEASE TRUST
Address: PO BOX 997509, SACRAMENTO, CA, 95899 (SACRAMENTO)

Latest MV Title: 009H002186029
Title Transfer Date: 07/07/2002
Plate: 165JKK (AZ) (07/05/2002-06/30/2003)
Type: PRIVATE

Lessor: HONDA LEASE TRUST



2008 MAZDA MPV LX-SV
VIN: JM3LW28A060566969
Vehicle Type: VAN
Original Title Date: 08/16/2006

Body Style: WAGON|4D|4D|7P|
Primary Color: SILVER
Weight:
Length: 189.5
Doors: 4
Drive Type: FWD

Registrant: THE FLEGAL FAMILY LI
Latest Plate: 2CK024P(ID) (07/07/2021-07/31/2023)

City/State: NAMPA, ID

Registrant: THE FLEGAL FAMILY LI
Address: 711 9TH AVE S, NAMPA, ID, 83651 (CANYON)
Owner: THE FLEGAL FAMILY LI
Address: 711 9TH AVE S, NAMPA, ID, 83651 (CANYON)

Latest MV Title: 210522831
Title Transfer Date: 07/13/2021
Plate: 2CK024P (ID) (07/07/2021-07/31/2023)
Type: PRIVATE
Previous Plate: WCFFX84 (AZ)

Registrants: EDWARD DARRELL EVENSON SR, MILDRED JEAN EVENSON
Latest Plate: WCFFX84(AZ) (06/28/2013-07/31/2021)

City/State: PRESCOTT VALLEY, AZ

Registrant: EDWARD DARRELL EVENSON SR(06/28/2013-05/28/2019)
DOB: 05/XX/1929
Address: 4158 N GELDING DR, PRESCOTT VALLEY, AZ, 86314 (YAVAPAI)

Latest MV Title: P037019148019
Title Transfer Date: 05/28/2019
Plate: WCFFX84 (AZ) (06/28/2013-07/31/2021)

Registrant: MILDRED JEAN EVENSON(06/28/2013-05/28/2019)
DOB: 09/XX/1933
Address: 4158 N GELDING DR, PRESCOTT VALLEY, AZ, 86314 (YAVAPAI)

Type: HANDICAPPED
Previous Plate: 282G8B (AZ)

Owner: EDWARD DARRELL EVENSON SR(06/28/2013-05/28/2019)
DOB: 05/XX/1929
Address: 4158 N GELDING DR, PRESCOTT VALLEY, AZ, 86314 (YAVAPAI)

Owner: MILDRED JEAN EVENSON(06/28/2013-05/28/2019)
DOB: 09/XX/1933
Address: 4158 N GELDING DR, PRESCOTT VALLEY, AZ, 86314 (YAVAPAI)

Registrant: DAVID WILLIAM KELL
Latest Plate: 282G8B(AZ) (03/17/2009-07/31/2013)

City/State: PRESCOTT, AZ

Registrant: DAVID WILLIAM KELL(03/17/2009-09/04/2012)
Address: 3532 LIESE DR, PRESCOTT, AZ, 86303 (YAVAPAI)
Owner: DAVID WILLIAM KELL(03/17/2009-09/04/2012)
Address: 1939 ROCKY DELLS DR, PRESCOTT, AZ, 86303 (YAVAPAI)

Latest MV Title: P033009076014
Title Transfer Date: 03/17/2009
Plate: 282G8B (AZ) (03/17/2009-07/31/2013)
Type: PRIVATE
Previous Plate: HAPCOAL (AZ)

Registrants: ALEXANDER DAVID COOPER, COURTNEY ANNE COOPER
Latest Plate: HAPCOAL(AZ) (09/24/2007-07/31/2009)

City/State: TUCSON, AZ

Registrant: ALEXANDER DAVID COOPER(04/24/2007-07/17/2008)
Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)
Registrant: COURTNEY ANNE COOPER(04/24/2007-07/17/2008)
Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)
Owner: ALEXANDER DAVID COOPER(04/24/2007-07/17/2008)

Latest MV Title: 040H007113066
Title Transfer Date: 04/24/2007
Plate: HAPCOAL (AZ) (09/24/2007-07/31/2009)
Previous Plate: 968XZE (AZ)

Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)
Owner: COURTNEY ANNE COOPER(04/24/2007-07/17/2008)
Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)
Lien Holder: VANTAGE WEST CREDIT UNION
Address: PO BOX 15115, TUCSON, AZ, 85708 (PIMA)
Lien Holder: VANTAGEWEST CREDIT UNION
Address: PO BOX 15115, TUCSON, AZ, 85708 (PIMA)

Registrants: KEITH WILLIAM MEYER, MONICA RUTH MEYER
Latest Plate: 058TFN(AZ) (08/16/2006-07/31/2007)

City/State: ORO VALLEY, AZ

Registrant: KEITH WILLIAM MEYER(08/16/2006)
Address: 13364 N REGULATION DR, ORO VALLEY, AZ, 85755 (PIMA)
Registrant: MONICA RUTH MEYER(08/16/2006)
Address: 13364 N REGULATION DR, ORO VALLEY, AZ, 85755 (PIMA)
Owner: KEITH WILLIAM MEYER(08/16/2006)
Address: 13364 N REGULATION DR, ORO VALLEY, AZ, 85755 (PIMA)
Owner: MONICA RUTH MEYER(08/16/2006)
Address: 13364 N REGULATION DR, ORO VALLEY, AZ, 85755 (PIMA)
Lien Holder: VANTAGE WEST CREDIT UNION
Address: PO BOX 15115, TUCSON, AZ, 85708 (PIMA)
Lien Holder: VANTAGEWEST CREDIT UNION
Address: PO BOX 15115, TUCSON, AZ, 85708 (PIMA)

Latest MV Title: AE05006228009
Title Transfer Date: 08/16/2006
Plate: 058TFN (AZ) (08/16/2006-07/31/2007)
Type: PRIVATE



1987 VOLKSWAGEN VANAGON GL CAMPER
VIN: WV2ZB0257HH057594
Vehicle Type: VAN
Original Title Date: 10/19/1987

Body Style: CAMPER~WAGON 3D
Primary Color: BROWN
Weight: 2998
Length: 179
Doors: 3
Drive Type: RWD

Registrant: [SUPPRESSED PER DPPA]
Latest Plate: BZR4760(WA) (07/27/2021-07/27/2022)

City/State:

Registrant: [SUPPRESSED PER DPPA](07/27/2021-Current)
Address: [SUPPRESSED PER DPPA] 98126
Owner: [SUPPRESSED PER DPPA](07/27/2021)
Address: [SUPPRESSED PER DPPA] 98126

Latest MV Title: 1819229248
Title Transfer Date: 07/27/2021
Plate: BZR4760 (WA) (07/27/2021-07/27/2022)
Type: PRIVATE

Registrant: ALEXANDER DAVID COOPER
Latest Plate: EER031(AZ) (12/05/2001-09/30/2007)

City/State: TUCSON, AZ

Registrant: ALEXANDER DAVID COOPER(06/26/2002-10/24/2006)
Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)
Owner: ALEXANDER DAVID COOPER(06/26/2002-10/24/2006)
Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)

Latest MV Title: T070002177008
Title Transfer Date: 06/26/2002
Plate: EER031 (AZ) (12/05/2001-09/30/2007)

Owners: INGEBORG MARIA POGLAYEN, IVO POGLAYEN
Owner: INGEBORG MARIA POGLAYEN
Address: PO BOX 85758, TUCSON, AZ, 85754 (PIMA)
Owner: IVO POGLAYEN
Address: PO BOX 85758, TUCSON, AZ, 85754 (PIMA)

City/State: TUCSON, AZ

Latest MV Title: P086066
Title Transfer Date: 10/19/1987

1998 VOLKSWAGEN JETTA GLS

Body Style: SEDAN 4D 4D 5P



VIN: 3VWSA81H5WM112658
Vehicle Type: CAR

Primary Color:
Weight:
Length: 173.4
Doors: 4
Drive Type: FWD

Registrant: DOMINIC JOSEPH RULLO
Latest Plate: 129SXM(AZ) (09/07/2005-03/31/2009)

City/State: TUCSON, AZ

Registrant: DOMINIC JOSEPH RULLO(09/07/2005-Current)
Address: 10300 N RANCHO SONORA DR, TUCSON, AZ, 85737 (PIMA)
Owner: DOMINIC JOSEPH RULLO(09/07/2005-10/29/2008)
Address: 10300 N RANCHO SONORA DR, TUCSON, AZ, 85737 (PIMA)
Owner: QUEBEDEAUX PONTIAC GMC
Address: 3566 E SPEEDWAY BLVD, TUCSON, AZ, 85716 (PIMA)

Latest MV Title: 0J35008308006
Title Transfer Date: 11/03/2008
Plate: 129SXM (AZ) (09/07/2005-03/31/2009)
Type: PRIVATE
Previous Plate: 314HRM (AZ)

Registrants: ALEXANDER DAVID COOPER, COURTNEY ANNE COOPER
Latest Plate: 314HRM(AZ) (05/10/2002-03/31/2005)

City/State: TUCSON, AZ

Registrant: ALEXANDER DAVID COOPER(05/10/2002-03/18/2004)
Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)
Registrant: COURTNEY ANNE COOPER(05/10/2002-03/18/2004)
Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)
Owner: ALEXANDER DAVID COOPER(05/10/2002-03/18/2004)
Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)
Owner: COURTNEY ANNE COOPER(05/10/2002-03/18/2004)
Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)
Lien Holder: BANK ONE LEASING
Address: PO BOX 37264, LOUISVILLE, KY, 40233 (JEFFERSON)
Lien Holder: BANK ONE NA
Address: PO BOX 37264, LOUISVILLE, KY, 40233 (JEFFERSON)
Lien Holder: JP MORGAN CHASE BANK N A
Address: PO BOX 11606, LEXINGTON, KY, 40576 (FAYETTE)

Latest MV Title: A78511E130093
Title Transfer Date: 05/10/2002
Plate: 314HRM (AZ) (05/10/2002-03/31/2005)
Type: PRIVATE
Previous Plate: FERCHE (WI)

Owner: NORTH SHORE LEASE

City/State: BROOKFIELD, WI

Owner: NORTH SHORE LEASE
Address: 15700 W BLUEMOUND RD, BROOKFIELD, WI, 53005 (WAUKESHA)
Lessor: NORTH SHORE LEASE
Address: 15700 W BLUEMOUND RD, BROOKFIELD, WI, 53005 (WAUKESHA)

Latest MV Title: 9807259013
Title Transfer Date: 03/09/1998

Registrants: MICHELE FERCHOFF, MICHELE FERCHOFF
Latest Plate: FERCHE(WI) (09/25/2001-10/31/2002)

City/State: MESA, AZ

Registrant: MICHELE FERCHOFF
Address: 2364 S PASEO LOMA CIR, MESA, AZ, 85202 (MARICOPA)
Registrant: MICHELE FERCHOFF
Address: 2364 S PASEO LOMA CIR, MESA, AZ, 85202 (MARICOPA)

Plate: FERCHE (WI) (09/25/2001-10/31/2002)
Type: PRIVATE

1975 VOLKSWAGEN COMMERCIAL KOMBI-CAMPMOBILE **Body Style:**
VIN: 2352135904 **Primary Color:**
Vehicle Type: PASSENGER CAR **Weight:**



Length:
Doors:

Registrant: CHAD E MIGHT
Latest Plate: 678JMB(AZ) (06/29/2002-03/31/2003)

City/State: TUCSON, AZ

Registrant: CHAD E MIGHT
Address: GENERAL DELIVERY, TUCSON, AZ, 85726 (PIMA)
Owner: CHAD E MIGHT
Address: GENERAL DELIVERY, TUCSON, AZ, 85726 (PIMA)

Latest MV Title: 01L1002189027
Title Transfer Date: 07/08/2002
Plate: 678JMB (AZ) (06/29/2002-03/31/2003)
Type: PRIVATE
Previous Plate: MZT751 (AZ)

Owner: MARK K BERRY

City/State: TUCSON, AZ

Owner: MARK K BERRY
Address: 1615 N TYNDALL AVE, TUCSON, AZ, 85719 (PIMA)

Latest MV Title: L6UB960730028
Title Transfer Date: 03/13/1996

Registrant: ALEXANDER DAVID COOPER
Latest Plate: MZT751(AZ) (11/21/2001-03/31/1997)

City/State: TUCSON, AZ

Registrant: ALEXANDER DAVID COOPER
Address: 2032 E BLACKLIDGE DR, TUCSON, AZ, 85719 (PIMA)

Plate: MZT751 (AZ) (11/21/2001-03/31/1997)

Aircraft**None Found****Possible Relatives****4 Found**

COURTNEY COOPER	(51)
ROGER COOPER	(71)
HAILEY COOPER	
SANDI COOPER	(85)
HAILEY COOPER	
COURTNEY COOPER	(51)
ROGER COOPER	(71)
SANDI COOPER	(85)
COURTNEY COOPER	(51)
ANNE MARTIN	(64)
SANDI COOPER	(85)
ROGER COOPER	(71)
COURTNEY COOPER	(51)

Possible Relative Details

4 Found

COURTNEY A COOPER

Alias(es)

COURTNEY A COOPER
COURTNEY ANNE COOPER
COURTNEY COPPER
COURTNEY COOPER
COURTNEY REEVES

DOB(s)

06/XX/1970 (51)

Last Seen Email Address:

None Found

SSN(s)

423-11-XXXX

Issued in Alabama, 1982

421-33-XXXX

Issued in Alabama, 1989-1992

Top Phones

Phone	Type	Last Seen	Provider
857-214-9061	Cellular	07/15/2021	VERIZON WIRELESS-MA
520-319-8708	Residential	05/30/2009	QWEST CORPORATION
520-792-8955	Residential	03/05/1999	QWEST CORPORATION

Address (County/Parish/Borough) History:

2032 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(03/01/1999-Current)
398 COLUMBUS AVE, BOSTON, MA 02116	(SUFFOLK)	(08/09/2021)
2480 KITTREDGE LOOP DR APT 952, BOULDER, CO 80310	(BOULDER)	(07/15/2021)
2153 N EDISON TER, TUCSON, AZ 85716	(PIMA)	(03/19/1999-12/31/2001)
301 N OLSEN AVE, TUCSON, AZ 85719	(PIMA)	(10/27/1998-03/01/1999)
123 HARBOR DR APT 203, STAMFORD, CT 06902	(FAIRFIELD)	(11/01/1997-12/31/1998)
1127 23RD ST S APT F2, BIRMINGHAM, AL 35205	(JEFFERSON)	(09/01/1996-12/31/1996)
2835 E FLORENCE DR, TUCSON, AZ 85716	(PIMA)	(06/28/1995-12/31/2001)
1615 N TYNDALL AVE, TUCSON, AZ 85719	(PIMA)	(08/01/1994-02/01/1995)
1347 N EUCLID AVE, TUCSON, AZ 85719	(PIMA)	(05/01/1992-12/31/1994)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: Yes **Motor Vehicles:** Yes **Employment:** No

HAILEY H COOPER

Alias(es)

HAILEY H COOPER

Last Seen Email Address:

None Found

SSN(s)

XXX-XX-XXXX

Issued in Arizona, 1995

Top Phones

No Phone Data

Address (County/Parish/Borough) History:

2032 E BLACKLIDGE DR, TUCSON, AZ 85719

(PIMA) (10/23/2007-Current)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: No **Motor Vehicles:** No **Employment:** No

ROGER J COOPER

Alias(es)

ROGER J COOPER
ROGER COOPER
ROBERT J COOPER
ROBER COOPER

DOB(s)

06/30/1950 (71)
06/XX/1951 (70)

Last Seen Email Address:
ROGERC@MCHSI.COM

SSN(s)

157-76-XXXX

Issued in New Jersey, 1985-1986
577-62-XXXX

Issued in District of Columbia, 1963

Top Phones

Phone	Type	Last Seen	Provider
917-855-9837	Cellular	08/11/2021	NEW CINGULAR WRLS DC
802-375-0029	Residential	06/07/2021	CONSOLIDATED VT
802-375-0268	Residential	05/28/2021	CONSOLIDATED VT

Address (County/Parish/Borough) History:

1308 E ARLINGTON RD, ARLINGTON, VT 05250	(BENNINGTON)	(04/01/1998-Current)
1346 E ARLINGTON RD, ARLINGTON, VT 05250	(BENNINGTON)	(06/24/2019-05/26/2021)
200 E 57TH ST APT 10M, NEW YORK, NY 10022	(NEW YORK)	(04/29/2011-06/18/2021)
PO BOX 25, ARLINGTON, VT 05250	(BENNINGTON)	(10/06/2009)
5872 N BRIGHT STAR DR, TUCSON, AZ 85718	(PIMA)	(12/26/2008-12/31/2009)
1070 MAPLE ST, ARLINGTON, VT 05250	(BENNINGTON)	(04/01/1998)
2835 E FLORENCE DR, TUCSON, AZ 85716	(PIMA)	(12/31/1996)
1127 23RD ST S, BIRMINGHAM, AL 35205	(JEFFERSON)	(12/31/1996)
1615 N TYNDALL AVE, TUCSON, AZ 85719	(PIMA)	(02/01/1994-12/31/1994)
RR 2 BOX 1070, ARLINGTON, VT 05250	(BENNINGTON)	(12/31/1989-12/31/2001)
PALMER S LANDING, STAMFORD, CT 06902	(FAIRFIELD)	(08/01/1989-12/31/1994)
123 HARBOR DR APT 203, STAMFORD, CT 06902	(FAIRFIELD)	(06/01/1989-12/31/2003)
WEST TERRE HAUTE IN, SAN JUAN, PR 00963	(CATANO)	(12/01/1987-06/30/1989)
PO BOX 418, MOUNT KISCO, NY 10549	(WESTCHESTER)	(12/31/1984)
BOX 1289, VENSUSAULA, OA		(12/01/1984)
1289 APTDO DE CORREOS, CARACAS VENEZUELA, OA		(11/01/1984)
250 SUMMIT AVE, SUMMIT, NJ 07901	(UNION)	(09/01/1984-06/30/1989)
1268 E ARLINGTON RD, ARLINGTON, VT 05250	(BENNINGTON)	(03/01/1984-05/26/2021)
ARLINGTON EAST RD, ARLINGTON, VT 05250	(BENNINGTON)	

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** Yes **Business Affiliations:** Yes

Properties: Yes **Motor Vehicles:** Yes **Employment:** Yes

D SANDI E COOPER

Alias(es)

SANDI E COOPER
 SANDI J COOPER
 SANDI COOPER
 ANDI E COOPER
 SANDI COOPER COOPER
 SANDI K COOPER

DOB(s)

04/XX/1936 (85)
 09/XX/1936 (85)

DOD(s)

06/26/2010

Last Seen Email Address:

None Found

SSN(s)

572-44-XXXX

Issued in California, 1951

157-76-XXXX

Issued in New Jersey, 1985-1986

Top Phones

Phone	Type	Last Seen	Provider
802-375-0029	Residential	07/26/2020	CONSOLIDATED VT
802-375-8373	Residential	04/28/2018	CONSOLIDATED VT
212-432-8020	Residential	12/01/2012	VERIZON NEW YORK INC

Address (County/Parish/Borough) History:

1308 E ARLINGTON RD, ARLINGTON, VT 05250	(BENNINGTON)	(04/03/1998-Current)
2835 E FLORENCE DR, TUCSON, AZ 85716	(PIMA)	(12/31/1996)
1127 23RD ST S, BIRMINGHAM, AL 35205	(JEFFERSON)	(12/31/1996)
RR 2 BOX 1070, ARLINGTON, VT 05250	(BENNINGTON)	(07/01/1992-07/20/2001)
PO BOX 2, ARLINGTON, VT 05250	(BENNINGTON)	(12/31/1989-05/06/1997)
PALMER S LANDING, STAMFORD, CT 06902	(FAIRFIELD)	(08/01/1989-12/31/1998)
123 HARBOR DR APT 203, STAMFORD, CT 06902	(FAIRFIELD)	(07/01/1989-06/26/2010)
1268 E ARLINGTON RD, ARLINGTON, VT 05250	(BENNINGTON)	(10/01/1984-06/26/2010)
250 SUMMIT AVE, SUMMIT, NJ 07901	(UNION)	(09/01/1984-12/31/1991)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: Yes **Motor Vehicles:** Yes **Employment:** No

Possible Associates

21 Found

FABIANA AHUMADA	(54)
JUDY ALBRECHT	(67)
JEANNE BAKER	
MARGARET BREAGY	(80)
WILLIAM BREAGY	(82)
JENNIFER GLENDENNING	(30)
PABLO GUERENSTEIN	(56)
SIRISHA GUERENSTEIN	
IAN JONES	(37)
ELAINE MANDELL	(85)
MARK MCCARTY	(68)
RITA MCCARTY	
FRED METZGER	(86)
EMILY NOLAN	(33)
CHRISTIE SAXON	(50)
AGUSTIN TEMPORINIAHUMADA	(~26-27)
AMY TRUONG	(46)
SHANDRU VALENZUELA	(39)
KATHY WATWOOD	(61)
COURTNEY WHITLEY	(42)
EMERSON WHITLEY	(45)

Possible Associate Details

21 Found

FABIANA AHUMADA

Alias(es)

FABIANA AHUMADA
FABIANA AHUMADASEGURA
FABIANA AHUMADA-SEGURA
FABIANA AHUMADA SEGURA
FABIANA A TEMPORINI
FABIANA TEMPORINI
FABIANA AHUMADA SEGURA
FABIANA SEGURA AHUMADA-SEGURA
FAVIANA A TEMPORINI

DOB(s)

07/XX/1967 (54)

Last Seen Email Address:

None Found

SSN(s)

600-71-XXXX

Issued in Arizona, 1997

Top Phones

Phone	Type	Last Seen	Provider
520-954-9437	Cellular	08/23/2021	VERIZON WIRELESS-AZ
520-750-1988	Residential	11/03/1997	QWEST CORPORATION
520-323-9074	Residential	06/01/2010	QWEST CORPORATION

Address (County/Parish/Borough) History:

313 NE 2ND ST APT 605, FORT LAUDERDALE, FL 33301	(BROWARD)	(01/14/2019-Current)
315 NE 3RD AVE APT 906, FORT LAUDERDALE, FL 33301	(BROWARD)	(04/01/2018-08/07/2019)
1244 S DESERT VISTA DR, TUCSON, AZ 85748	(PIMA)	(09/23/2016-09/10/2019)
5751 N KOLB RD # 11, TUCSON, AZ 85750	(PIMA)	(09/23/2016-04/26/2021)
1641 ZENITH WAY, FORT LAUDERDALE, FL 33327	(BROWARD)	(09/16/2016-04/14/2020)
PO BOX 64876, TUCSON, AZ 85728	(PIMA)	(04/28/2016-05/09/2017)
2102 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(05/10/2003-05/04/2021)
915 N VENICE AVE APT D, TUCSON, AZ 85711	(PIMA)	(09/22/1998-05/15/2003)
4900 E 5TH ST APT 2105, TUCSON, AZ 85711	(PIMA)	(10/01/1997-12/31/2001)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** Yes

Properties: Yes **Motor Vehicles:** Yes **Employment:** Yes

JUDY R ALBRECHT

Alias(es)

JUDY R ALBRECHT
J R HUGHES
JUDY ALBRECHT
JUDY A ALBRECHT
J ALBRECHT
JUDY ALRECHT
JUDY R HUGHES

DOB(s)

08/XX/1954 (67)
08/XX/1954 (67)
11/XX/1911 (109)

Last Seen Email Address:

JOEYEISENMAN@USA.NET

JUDY ALBRECHT ALBRECHT
JUDIE ALBRENT

SSN(s)

138-50-XXXX

Issued in New Jersey, 1970

Top Phones

Phone	Type	Last Seen	Provider
713-973-9338	Residential	09/01/2021	SOUTHWESTERN BELL
713-973-9344	Residential	04/25/2009	SOUTHWESTERN BELL

Address (County/Parish/Borough) History:

436 KNIPP OAKS ST, HOUSTON, TX 77024	(HARRIS)	(01/02/1988-Current)
85 E WARD VIEW CIR, , NV 00000		(03/16/2009-11/07/2020)
711 LOUISIANA ST STE 1600, HOUSTON, TX 77002	(HARRIS)	(03/16/2009-10/10/2014)
126 RANCH CREEK LN, CARBONDALE, CO 81623	(EAGLE)	(10/09/2002-11/25/2015)
82 HWY, CARBONDALE, CO 81623	(GARFIELD)	(10/09/2002-11/25/2015)
606 WILLOWGREN DR, HOUSTON, TX 77024	(HARRIS)	(07/01/1991-12/31/2001)
1601 S SHEPHERD DR APT 281, HOUSTON, TX 77019	(HARRIS)	(02/01/1989-03/02/2017)
525 CREEKSIDE ST, HOUSTON, TX 77088	(HARRIS)	(12/31/1988)
BOX 713, DENVER, CO 80201	(DENVER)	(01/01/1987-12/31/1989)
475 STEAMBOAT RD FL 2ND, GREENWICH, CT 06830	(FAIRFIELD)	(12/01/1985-12/31/1988)
336 PINE CREEK AV, FAIRFIELD, CT 06430		(10/01/1985)
123 HARBOR DR APT 203, STAMFORD, CT 06902	(FAIRFIELD)	(07/01/1985-12/31/1993)
444 E 86TH ST, NEW YORK, NY 10028	(NEW YORK)	(10/01/1984-12/31/1985)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: Yes **Motor Vehicles:** Yes **Employment:** No

JEANNE BAKER

Alias(es)

JEANNE BAKER

Last Seen Email Address:

None Found

Top Phones

No Phone Data

Address (County/Parish/Borough) History:

1110 19TH ST S APT 4, BIRMINGHAM, AL 35205	(JEFFERSON)	(02/29/1996-Current)
1127 23RD ST S APT F2, BIRMINGHAM, AL 35205	(JEFFERSON)	(06/01/1995-12/31/1996)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: No **Motor Vehicles:** No **Employment:** No

D MARGARET A BREAGY

Alias(es)

MARGARET A BREAGY

MARGARET BREAGY

MARGARE BREAGY

DOB(s)

04/XX/1941 (80)

DOD(s)

MARGARET A BREGY
MARGAR BREGY
MARGARET BREASY

01/31/2007

Last Seen Email Address:
MBREAGY@AOL.COM

SSN(s)

204-32-XXXX

Issued in Pennsylvania, 1958-1960

Top Phones

Phone	Type	Last Seen	Provider
859-384-2250	Residential	07/01/2016	CINCINNATI BELL
859-331-8499	Residential	04/04/2005	CINCINNATI BELL

Address (County/Parish/Borough) History:

10763 CROWN POINTE DR, UNION, KY 41091	(BOONE)	(04/01/1993-Current)
909 MAN O WAR BLVD, UNION, KY 41091	(BOONE)	(11/05/2016-08/28/2021)
2053 WEDGEWOOD LN, HEBRON, KY 41048	(BOONE)	(05/03/2015-03/06/2017)
2511 S OCEAN BLVD, MYRTLE BEACH, SC 29577	(HORRY)	(03/17/2005)
564 CLOVERFIELD LN APT 106, COVINGTON, KY 41011	(KENTON)	(12/01/1992-12/31/1994)
6926 MIAMI BLUFF DR, CINCINNATI, OH 45227	(HAMILTON)	(06/01/1985-12/31/1992)
304 BRADFORDRIDGE LN APT A, COVINGTON, KY 41011	(KENTON)	(03/01/1985-12/31/1993)
250 SUMMIT AVE, SUMMIT, NJ 07901	(UNION)	(12/31/1983-12/31/1989)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: No **Motor Vehicles:** No **Employment:** Yes

D WILLIAM E BREAGY JR

Alias(es)

WILLIAM E BREAGY JR
WILLIAM E BREAGY
BREAGY ESTATE-WILLIAM
WILLIAM BREAGY
BILL BREAGY
BILL BREAGY JR
WILLIAM BREAGY JR
WILLIAM EDWARD BREAGY
WILLIAM EDWARD BREAGY JR
WILLIAM E BREASY

DOB(s)

02/XX/1939 (82)
XX/XX/XXXX (81)
10/XX/???? (??)

DOD(s)

02/09/2015

Last Seen Email Address:
BBREAGY@AOL.COM

SSN(s)

137-30-XXXX

Issued in New Jersey, 1954-1956

XXX-XX-XXXX

Issued in New Jersey, 1954-1956

Top Phones

Phone	Type	Last Seen	Provider
859-466-6892	Cellular	12/21/2020	SPRINT SPECTRUM L.P.
859-486-3940	Cellular	08/04/2012	VERIZON WIRELESS-KY
859-384-2250	Residential	08/15/2021	CINCINNATI BELL

Address (County/Parish/Borough) History:

2053 WEDGEWOOD LN, HEBRON, KY 41048	(BOONE)	(12/25/2006-Current)
909 MAN O WAR BLVD, UNION, KY 41091	(BOONE)	(08/01/2015-03/01/2021)
10763 CROWN POINTE DR, UNION, KY 41091	(BOONE)	(04/01/1993-02/09/2015)
564 CLOVERFIELD LN APT 106, COVINGTON, KY 41011	(KENTON)	(12/01/1992-12/31/1994)
8543 HARPERS POINT DR, CINCINNATI, OH 45249	(HAMILTON)	(10/01/1990-12/31/1991)
2115 POPLAR, OXFORD, OH 45056	(BUTLER)	(03/01/1989)
411 SUN AVE, CINCINNATI, OH 45232	(HAMILTON)	(03/01/1985-12/31/2003)
6926 MIAMI BLUFF DR, CINCINNATI, OH 45227	(HAMILTON)	(03/01/1985-12/31/1994)
250 SUMMIT AVE, SUMMIT, NJ 07901	(UNION)	(12/31/1983-12/31/1989)
1486 GONE AWAY CT, WHEATON IL, OA		

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** Yes **Business Affiliations:** No

Properties: Yes **Motor Vehicles:** Yes **Employment:** No

JENNIFER GLENDENNING**Alias(es)**

JENNIFER GLENDENNING
 JENNIFER L GLENDENNING
 JENNIFER LYNETTE GLENDENNING
 JENNIFER ROMAN
 JENNIFER GLENDENNIG
 JENNIFER DENING
 JENNIFER LYNETTE ROMAN
 JENNIFER L ROMAN
 JENNIFER L GLENDENNING SR
 JENNIFER LYNETTE GLENDENNING SR

DOB(s)

01/02/1991 (30)

Last Seen Email Address:

ITSJBAY@OUTLOOK.COM

SSN(s)

601-98-XXXX

Issued in Arizona, 1988-1992

Top Phones

Phone	Type	Last Seen	Provider
949-542-2388	Cellular	09/02/2017	T-MOBILE USA INC.
520-227-4207	Cellular	09/04/2013	SPRINT SPECTRUM L.P.
347-245-6513	Cellular	11/02/2012	SPRINT SPECTRUM L.P.

Address (County/Parish/Borough) History:

4234 E MONTE VISTA DR UNIT 2, TUCSON, AZ 85712	(PIMA)	(11/14/2020-Current)
2875 N TUCSON BLVD APT 37, TUCSON, AZ 85716	(PIMA)	(08/01/2019-10/31/2020)
2032 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(05/02/2017-03/01/2021)
1360 E 20TH ST, DOUGLAS, AZ 85607	(COCHISE)	(12/15/2016)
3148 N COLUMBUS BLVD, TUCSON, AZ 85712	(PIMA)	(10/01/2016-10/28/2017)
714 E 17TH ST APT A, DOUGLAS, AZ 85607	(COCHISE)	(09/26/2015-10/29/2016)
4357 E 16TH ST, TUCSON, AZ 85711	(PIMA)	(08/19/2014)
1920 E 7TH ST, DOUGLAS, AZ 85607	(COCHISE)	(06/01/2014-12/31/2014)
2614 E 7TH ST, DOUGLAS, AZ 85607	(COCHISE)	(09/01/2013-12/31/2013)
2108 E 7TH ST, DOUGLAS, AZ 85607	(COCHISE)	(05/01/2011-12/31/2013)
1922 N TOMPKINS AVE, DOUGLAS, AZ 85607	(COCHISE)	(12/31/2010)

115 PALM AVE, PIRTLEVILLE, AZ 85626	(COCHISE)	(06/02/2010-04/30/2016)
1192 E 7TH ST, DOUGLAS, AZ 85607	(COCHISE)	(03/01/2010-10/26/2019)
1600 VAN BUREN AVE APT 1102, DOUGLAS, AZ 85607	(COCHISE)	(05/05/2008-07/01/2017)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** Yes **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** No

PABLO G GUERENSTEIN

Alias(es)

PABLO G GUERENSTEIN
PABLO DUERENSTEIN
PABLO GUERENSTEIN

DOB(s)

01/XX/1965 (56)

Last Seen Email Address:

None Found

SSN(s)

601-93-XXXX

Issued in Arizona, 1999-2000

Top Phones

Phone	Type	Last Seen	Provider
520-319-0828	Residential	10/30/2015	QWEST CORPORATION
520-621-6643	Residential	03/27/2006	QWEST CORPORATION

Address (County/Parish/Borough) History:

2102 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(07/12/2013-Current)
724 N NORTON AVE, TUCSON, AZ 85719	(PIMA)	(09/11/2008-05/30/2009)
2415 E 3RD ST, TUCSON, AZ 85719	(PIMA)	(07/30/2008)
1941 E 2ND ST, TUCSON, AZ 85719	(PIMA)	(12/17/1999-03/01/2021)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** No

SIRISHA GUERENSTEIN

Alias(es)

SIRISHA GUERENSTEIN
SIRISHA M GUERENSTEIN

DOB(s)

XX/XX/XXXX (~58-59)

09/XX/???? (??)

Last Seen Email Address:

None Found

Top Phones

No Phone Data

Address (County/Parish/Borough) History:

2102 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(07/01/2013-Current)
724 N NORTON AVE, TUCSON, AZ 85719	(PIMA)	(12/04/2008-03/01/2021)
2415 E 3RD ST, TUCSON, AZ 85719	(PIMA)	(07/30/2008-12/31/2012)
1941 E 2ND ST, TUCSON, AZ 85719	(PIMA)	(12/31/2001-12/31/2008)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** No

IAN R JONES**Alias(es)**

IAN R JONES
IAN RANDAL JONES
IAN JONES

DOB(s)

09/XX/1984 (37)

Last Seen Email Address:

None Found

SSN(s)

626-14-XXXX

Issued in California, 1988

Top Phones

Phone	Type	Last Seen	Provider
510-847-8337	Cellular	09/08/2016	VERIZON WIRELESS-CA
510-653-2884	Residential	09/21/2006	PACIFIC BELL
615-401-9207	Residential	03/01/2019	COMCAST PHONE - TN

Address (County/Parish/Borough) History:

2102 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(08/17/2016-Current)
4625 E 8TH ST, TUCSON, AZ 85711	(PIMA)	(09/01/2015-08/17/2016)
3062 N PRESIDIO PARK PL, TUCSON, AZ 85716	(PIMA)	(09/01/2014-12/31/2014)
3646 E BLACKLIDGE DR UNIT 3, TUCSON, AZ 85716	(PIMA)	(09/01/2012-03/07/2016)
2738 N RICHEY BLVD, TUCSON, AZ 85716	(PIMA)	(11/01/2011-12/31/2011)
34 NACE AVE, OAKLAND, CA 94611	(ALAMEDA)	(09/01/2006-04/26/2014)
125 JORDAN S APT 1, BLOOMINGTON, IN 47406	(MONROE)	(10/01/2004-12/31/2004)
155 VALLEY FRG, NASHVILLE, TN 37205	(DAVIDSON)	(02/01/2019)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: Yes **Motor Vehicles:** Yes **Employment:** No

D ELAINE W MANDELL**Alias(es)**

ELAINE W MANDELL
ELAINE MANDELL
ELAINE W MADELL

DOB(s)

08/XX/1936 (85)

DOD(s)

07/30/2008

Last Seen Email Address:

EMANDELL@WEBTV.NET

SSN(s)

169-30-XXXX

Issued in Pennsylvania, 1953-1955

169-24-XXXX

Issued in Pennsylvania, 1936-1950

Top Phones

Phone	Type	Last Seen	Provider
203-625-6160	Residential	01/28/2006	VERIZON NEW YORK INC
203-625-2616	Residential	01/01/2005	VERIZON NEW YORK INC
203-625-2618	Residential	07/26/2008	VERIZON NEW YORK INC

Address (County/Parish/Borough) History:

PO BOX 93, MOUNTAINVILLE, NY 10953	(ORANGE)	(01/01/2005-Current)
79 PLEASANT HILL RD, MOUNTAINVILLE, NY 10953	(ORANGE)	(08/29/2009-12/31/2010)

2200 BENJAMIN FRANKLIN PKWY APT S411, PHILADELPHIA, PA 19130	(PHILADELPHIA)	(11/08/2008-08/28/2021)
30 BROOKSIDE DR APT 1H, GREENWICH, CT 06830	(FAIRFIELD)	(05/01/2002-07/30/2008)
PO BOX 125, MOUNTAINVILLE, NY 10953	(ORANGE)	(02/01/1997-07/30/2008)
101 LEWIS ST APT K, GREENWICH, CT 06830	(FAIRFIELD)	(10/01/1994-12/31/2001)
208 PALMER LANDING APT 208, STAMFORD, CT 06902	(FAIRFIELD)	(12/01/1986-12/31/1993)
123 HARBOR DR APT 208, STAMFORD, CT 06902	(FAIRFIELD)	(09/01/1986-07/16/2001)
34 LOCUST RED BARN APT J1, RYE, NY 10580	(WESTCHESTER)	(12/31/1985-12/31/1991)
45 DEARBORN AVE, RYE, NY 10580	(WESTCHESTER)	(07/01/1985-12/31/1986)
720 MILTON RD, RYE, NY 10580	(WESTCHESTER)	(12/31/1983-12/31/1993)
3 DEERFIELD LN, MAMARONECK, NY 10543	(WESTCHESTER)	(12/31/1983-12/31/1987)
79 PUTNAM PARK, GREENWICH, CT 06830	(FAIRFIELD)	(10/01/1974-09/01/1991)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** Yes

Properties: No **Motor Vehicles:** No **Employment:** Yes

MARK P MCCARTY

Alias(es)	DOB(s)
MARK P MCCARTY	11/13/1952 (68)
MARK P MC CARTY	
MARK MCCARTY	Last Seen Email Address:
MARK R MCCARTY	None Found

SSN(s)

483-72-XXXX
Issued in Iowa, 1969

Top Phones

Phone	Type	Last Seen	Provider
520-730-5612	Cellular	02/13/2018	VERIZON WIRELESS-AZ
520-748-7609	Residential	01/19/2012	QWEST CORPORATION
520-720-5612	Residential	12/19/2011	QWEST CORPORATION

Address (County/Parish/Borough) History:

2022 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(04/06/1981-Current)
1221 N SYCAMORE BLVD UNIT 2, TUCSON, AZ 85712	(PIMA)	(10/01/2010-10/12/2011)
3737 N COUNTRY CLUB RD APT 205S, TUCSON, AZ 85716	(PIMA)	(03/28/2003-12/31/2009)
320 W ALTURAS ST, TUCSON, AZ 85705	(PIMA)	(12/01/2001-04/26/2008)
1821 E BROADWAY BLVD, TUCSON, AZ 85719	(PIMA)	(08/01/2001-12/31/2001)
COUNTY ROAD TITLE SECURITY, TUCSON AZ, AZ 85732	(PIMA)	(03/09/1999)
2423 W DA, COLORADO SPRINGS, CO 80904	(EL PASO)	(12/31/1993)
380 E UNIVERSITY BLVD, TUCSON, AZ 85705	(PIMA)	(09/01/1991-12/31/2000)
PO BOX 12947, TUCSON, AZ 85732	(PIMA)	(07/01/1988-12/31/1990)
4131 E BRYANT PL, TUCSON, AZ 85711	(PIMA)	(04/01/1980-04/26/2021)
2454 E 36TH ST, TUCSON, AZ 85713	(PIMA)	(10/25/1979-02/19/2021)
2452 E 36TH ST, TUCSON, AZ 85713	(PIMA)	(10/25/1979-04/26/2021)
2444 E 36TH ST, TUCSON, AZ 85713	(PIMA)	(10/25/1979-02/19/2021)
2442 E 36TH ST, TUCSON, AZ 85713	(PIMA)	(10/25/1979-04/26/2021)
4620 E MONTECITO ST, TUCSON, AZ 85711	(PIMA)	(09/25/1978-02/19/2021)
4618 E MONTECITO ST, TUCSON, AZ 85711	(PIMA)	(09/25/1978-04/26/2021)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** Yes **Business Affiliations:** Yes

Properties: Yes **Motor Vehicles:** Yes **Employment:** Yes

RITA M MCCARTY

Alias(es)

RITA M MCCARTY

Last Seen Email Address:

None Found

Top Phones

No Phone Data

Address (County/Parish/Borough) History:

2022 E BLACKLIDGE DR, TUCSON, AZ 85719

(PIMA)

(11/06/2014-Current)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: Yes **Motor Vehicles:** No **Employment:** No

FRED W METZGER

Alias(es)

FRED W METZGER

FRED METZGER

FRED MARTIN METZGER

FRED METZGER SR

FREDERICK M METZGER

FREDERICK M METZGER SR

FRED M METSKER

FREDRICK METZGE

FRED M METZGER

DOB(s)

06/XX/1935 (86)

Last Seen Email Address:

None Found

SSN(s)

073-28-XXXX

Issued in New York, 1951-1953

Top Phones

Phone	Type	Last Seen	Provider
623-977-5284	Cellular	05/19/2021	QWEST CORPORATION
623-696-8938	Cellular	03/14/2006	VERIZON WIRELESS-AZ
828-298-5357	Residential	04/03/2005	BELLSOUTH SO BELL

Address (County/Parish/Borough) History:

10950 W UNION HILLS DR, SUN CITY, AZ 85373

(MARICOPA)

(03/01/1999-Current)

1970 N LESLIE ST, PAHRUMP, NV 89060

(NYE)

(02/01/2002-04/07/2017)

6301 SQUAW VALLEY RD, PAHRUMP, NV 89061

(NYE)

(11/01/2000-04/01/2013)

766 LARKFIELD RD, EAST NORTHPORT, NY 11731

(SUFFOLK)

(04/01/1989)

680 CHRISTIAN CREEK RD, SWANNANOA, NC 28778

(BUNCOMBE)

(10/01/1986-12/12/2016)

205 4TH AVE, EAST NORTHPORT, NY 11731

(SUFFOLK)

(12/31/1983-12/31/1994)

250 SUMMIT AVE, SUMMIT, NJ 07901

(UNION)

(12/31/1983-12/31/1989)

207 WHISTERING HILL TC, CHESTER, NY 10918

(ORANGE)

(03/01/1983-03/01/1988)

441 FRANKLIN TURNPI APT D, MAHWAH, NJ 07430

(BERGEN)

(03/01/1983-12/31/1986)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** No

EMILY C NOLAN

Alias(es)

EMILY C NOLAN
EMILY CHARLOTTE NOLAN
EMILY NOLAN

DOB(s)

08/15/1988 (33)

Last Seen Email Address:

None Found

SSN(s)

035-60-XXXX

Issued in Rhode Island, 1988-1992

Top Phones

Phone	Type	Last Seen	Provider
401-965-0412	Cellular	08/23/2021	NEW CINGULAR WRLS DC
520-618-1630	Residential	07/02/2013	LEVEL3 TELECOM OF AZ
401-743-0259	Cellular	07/01/2016	NEW CINGULAR WRLS DC

Address (County/Parish/Borough) History:

2102 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(09/01/2016-Current)
4625 E 8TH ST, TUCSON, AZ 85711	(PIMA)	(09/01/2015-10/29/2016)
3062 N PRESIDIO PARK PL, TUCSON, AZ 85716	(PIMA)	(09/10/2014-08/19/2020)
3121 N SWAN RD APT 265, TUCSON, AZ 85712	(PIMA)	(04/26/2013-05/20/2016)
3220 W INA RD APT 15206, TUCSON, AZ 85741	(PIMA)	(05/01/2012-12/31/2012)
2738 N RICHEY BLVD, TUCSON, AZ 85716	(PIMA)	(08/01/2011-12/31/2012)
6450 E GOLF LINKS RD APT 1020, TUCSON, AZ 85730	(PIMA)	(10/01/2010-12/31/2010)
126 BUCKLEY S, STORRS, CT 06269	(TOLLAND)	(11/09/2006)
2 N WINNISQUAM DR, WARWICK, RI 02886	(KENT)	(08/01/2006-12/31/2010)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** Yes **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** No

D CHRISTIE M SAXON

Alias(es)

CHRISTIE M SAXON
MARIA C SAXON
MARIA CHRISTINA SAXON
CHRISTINA SAXON
CHRISTIE SAXON
MARIA SAXON
CHRISTINA M SAXON
M CHRISTINA SAXON

DOB(s)

02/XX/1971 (50)

DOD(s)

04/14/2005

Last Seen Email Address:

KDEALSSMSS@GMAIL.COM

SSN(s)

148-64-XXXX

Issued in New Jersey, 1977

Top Phones

Phone	Type	Last Seen	Provider
732-270-4181	Residential	11/30/2017	VERIZON NEW JERSEY
215-387-2768	Residential	08/03/2011	VERIZON PENNSYLVANIA
215-569-3232	Residential	03/13/2005	VERIZON PENNSYLVANIA

Address (County/Parish/Borough) History:

10 BASH RD, TOMS RIVER, NJ 08753	(OCEAN)	(02/01/1989-Current)
4323 SPRUCE ST APT 1R, PHILADELPHIA, PA 19104	(PHILADELPHIA)	(07/01/2003-12/31/2004)
4412 PINE ST APT 1, PHILADELPHIA, PA 19104	(PHILADELPHIA)	(10/01/2002-12/31/2002)
4406 PINE ST APT 1, PHILADELPHIA, PA 19104	(PHILADELPHIA)	(06/01/1998-12/31/2001)
1328 16TH AVE S, BIRMINGHAM, AL 35205	(JEFFERSON)	(07/01/1996-12/31/1997)
1127 23RD ST S APT F2, BIRMINGHAM, AL 35205	(JEFFERSON)	(03/01/1994-06/01/2000)
1626 SELBY AVE SIDE, SAINT PAUL, MN 55104	(RAMSEY)	(09/30/1993-01/01/1994)
1435 GRAND AVE APT 6, SAINT PAUL, MN 55105	(RAMSEY)	(08/10/1993-12/31/1993)
1050 HADLEY AVE N APT 305L, OAKDALE, MN 55128	(WASHINGTON)	(09/01/1992-06/01/1993)
6786 4TH ST N, SAINT PAUL, MN 55128	(WASHINGTON)	(07/01/1992)
63 HURRICANE SHOALS ROAD, LAWRENCEVILLE, GA		(10/01/1989-12/31/1990)
H5 HUNTINGTON APT, GREENWOOD, SC 29646	(GREENWOOD)	(09/01/1989-12/31/1991)
1424 16TH AVE S, BIRMINGHAM, AL 35205	(JEFFERSON)	(03/01/1989)
4401 CHESTNUT ST, PHILADELPHIA, PA 19104	(PHILADELPHIA)	(08/03/2011)
7101 10TH ST N 152, SAINT PAUL, MN 55128	(WASHINGTON)	
4 FISHER BV, TOMS RIVER, NJ 08753	(OCEAN)	

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: No **Motor Vehicles:** No **Employment:** No

AGUSTIN TEMPORINIAHUMADA

Alias(es)

AGUSTIN TEMPORINIAHUMADA
 AGUSTIN TEMPORINI
 AGUSTIN TEMPORINI AHUMADA
 AGUSTIN AGUSTIN TEMPORINI AHUMADA
 A TEMPORINI AHUMADA

DOB(s)

02/XX/1994 (27)

Last Seen Email Address:

None Found

SSN(s)

765-44-XXXX

Issued in Arizona, 2004

Top Phones

Phone	Type	Last Seen	Provider
520-954-2992	Cellular	02/12/2019	VERIZON WIRELESS-AZ

Address (County/Parish/Borough) History:

13675 COURSEY BLVD APT 317, BATON ROUGE, LA 70817	(EAST BATON ROUGE)	(03/01/2020-Current)
313 NE 2ND ST APT 605, FORT LAUDERDALE, FL 33301	(BROWARD)	(08/20/2019)
12901 JEFFERSON HWY APT 731, BATON ROUGE, LA 70816	(EAST BATON ROUGE)	(06/21/2018-10/31/2020)
315 NE 3RD AVE APT 906, FORT LAUDERDALE, FL 33301	(BROWARD)	(04/21/2018)
4900 E 5TH ST APT 1922, TUCSON, AZ 85711	(PIMA)	(11/05/2016-10/27/2018)
1641 ZENITH WAY, FORT LAUDERDALE, FL 33327	(BROWARD)	(10/01/2016-03/01/2021)
2102 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(08/01/2013-03/01/2021)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** No

AMY L TRUONG

Alias(es)	DOB(s)
AMY L TRUONG	10/XX/1975 (46)
AMY TRUONG	10/XX/1955 (66)
AMY LUNA	
AMY TRUANG	Last Seen Email Address:
AMY LUNA TROUNG	RKENWARD@COMCAST.NET
LUNA AMIE	
AMIE TRUONG	

SSN(s)

527-95-XXXX
Issued in Arizona, 1982

Top Phones

Phone	Type	Last Seen	Provider
520-484-0391	Cellular	03/28/2020	SPRINT SPECTRUM L.P.
949-910-6688	Cellular	06/12/2018	T-MOBILE USA INC.
714-391-4999	Cellular	02/07/2012	T-MOBILE USA INC.

Address (County/Parish/Borough) History:

4234 E MONTE VISTA DR UNIT 2, TUCSON, AZ 85712	(PIMA)	(10/01/2020-Current)
2875 N TUCSON BLVD APT 37, TUCSON, AZ 85716	(PIMA)	(03/01/2019-03/01/2021)
2032 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(04/01/2017-10/27/2018)
3148 N COLUMBUS BLVD, TUCSON, AZ 85712	(PIMA)	(04/01/2016-10/29/2016)
4310 E ALLISON RD, TUCSON, AZ 85712	(PIMA)	(06/13/2015-10/31/2015)
4357 E 16TH ST, TUCSON, AZ 85711	(PIMA)	(09/19/2014-01/26/2015)
1510 N BELVEDERE AVE, TUCSON, AZ 85712	(PIMA)	(10/29/2013)
214 N MOUNTAIN VIEW AVE, TUCSON, AZ 85711	(PIMA)	(10/01/2012-12/31/2014)
9555 E SHILOH ST APT 8203, TUCSON, AZ 85748	(PIMA)	(10/01/2011-04/25/2015)
550 N HARRISON RD APT 1207, TUCSON, AZ 85748	(PIMA)	(04/01/2011-12/31/2011)
3907 LEAH HTS, COLORADO SPRINGS, CO 80906	(EL PASO)	(05/01/2009-12/25/2011)
35 GREENFIELD, IRVINE, CA 92614	(ORANGE)	(12/19/2005-12/31/2008)
2604 LUCILLE DR APT A, KILLEEN, TX 76549	(BELL)	(03/08/2004)
4200 JULY DR APT B, KILLEEN, TX 76549	(BELL)	(12/25/2002-12/25/2008)
1555 E 10TH ST, DOUGLAS, AZ 85607	(COCHISE)	(03/19/2001-04/25/2009)
1638 E 10TH ST, DOUGLAS, AZ 85607	(COCHISE)	(07/01/1998-03/01/2005)
2700 E 15TH ST APT 4, DOUGLAS, AZ 85607	(COCHISE)	(11/01/1995-12/31/2002)
2700 FIFTEEN, DOUGLAS, AZ 85607	(COCHISE)	(11/01/1995-12/31/1995)
1192 E 7TH ST, DOUGLAS, AZ 85607	(COCHISE)	(05/11/1995-03/01/2021)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** No

SHANDRU VALENZUELA

Alias(es)

SHANDRU VALENZUELA
 VALENZUELA SHANDRU
 SANDRA VALENZUELA
 SHONDRU VALENZUELA
 SHANDRU VALENZUELA
 SHANDRA VALENZUELA
 SHAN VALENZUELA

DOB(s)

09/01/1982 (39)

Last Seen Email Address:

None Found

SSN(s)

573-71-XXXX

Issued in California, 1982

Top Phones

Phone	Type	Last Seen	Provider
720-454-8247	Cellular	07/04/2021	NEW CINGULAR WIRELESS
720-361-6162	Cellular	02/04/2015	NEW CINGULAR WIRELESS
520-982-0631	Cellular	04/06/2009	SPRINT SPECTRUM L.P.

Address (County/Parish/Borough) History:

2032 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(04/29/2019-Current)
1332 E HEDRICK DR, TUCSON, AZ 85719	(PIMA)	(07/04/2021-08/28/2021)
4100 N ROMERO RD LOT 25, TUCSON, AZ 85705	(PIMA)	(06/13/2021)
10951 E GARDEN DR APT 312, AURORA, CO 80012	(ARAPAHOE)	(02/20/2017-09/08/2020)
1105 BACCHUS DR APT E, LAFAYETTE, CO 80026	(BOULDER)	(01/07/2016-10/28/2017)
51 21ST AVE APT 31, LONGMONT, CO 80501	(BOULDER)	(02/26/2015-04/29/2017)
3314 S 16TH AVE, TUCSON, AZ 85713	(PIMA)	(12/01/2014)
1209 CENTAUR CIR APT A, LAFAYETTE, CO 80026	(BOULDER)	(03/24/2012-02/20/2017)
1415 S TYNDALL AVE, TUCSON, AZ 85713	(PIMA)	(11/01/2007-03/01/2009)
224 W RAGA, TUCSON, AZ 85716	(PIMA)	(04/30/2007)
7671 E TANQUE VERDE RD APT 630, TUCSON, AZ 85715	(PIMA)	(07/01/2006-04/26/2014)
6516 E STELLA RD APT X, TUCSON, AZ 85730	(PIMA)	(01/01/2005-02/05/2005)
3122 N WINSTEL BLVD UNIT A, TUCSON, AZ 85716	(PIMA)	(12/31/2004-03/01/2009)
3431 S KOLB RD, TUCSON, AZ 85730	(PIMA)	(03/10/2004)
224 W ROGER RD UNIT 1, TUCSON, AZ 85705	(PIMA)	(01/20/2004-12/31/2004)
2323 W CHANNING ST, WEST COVINA, CA 91790	(LOS ANGELES)	(06/10/2002-12/31/2005)
7001 E GOLF LINKS RD APT 104, TUCSON, AZ 85730	(PIMA)	(06/01/2000-12/01/2018)
737 N ALVERNON WAY, TUCSON, AZ 85711	(PIMA)	(06/01/2000-12/31/2003)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** Yes **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** Yes

KATHY WATWOOD**Alias(es)**

KATHY WATWOOD
 KATHY A WATWOOD
 KATZ MUSIC
 KATHERINE A WATWOOD
 KATHERINE WATFORD

DOB(s)

01/XX/1960 (61)

11/XX/1958 (62)

Last Seen Email Address:

THEORISTHREAT@GMAIL.COM

KATHERINE WATWOOD
KATZ A MUSIC
KATHERINE GILHAM
KATHY A WARWOOD
KATHY ANN WATWOOD
KATHERINE ANN WATWOOD
KATHY MUSIC
KATHERINE A GILHAM
KATHRINE GILHAM

SSN(s)

418-98-XXXX

Issued in Alabama, 1976

Top Phones

Phone	Type	Last Seen	Provider
205-215-9172	Cellular	12/08/2016	NEW CINGULAR WRLS GA
205-639-7711	Cellular	01/05/2014	NEW CINGULAR WRLS GA
720-962-0207	Residential	06/01/2016	QWEST CORPORATION

Address (County/Parish/Borough) History:

4141 PINSON VALLEY PKWY APT 1404, BIRMINGHAM, AL 35215	(JEFFERSON)	(06/01/2016-Current)
2300 5TH AVE N APT 1004, BIRMINGHAM, AL 35203	(JEFFERSON)	(08/03/2021)
1145 ROEBUCK LAWN DR, BIRMINGHAM, AL 35215	(JEFFERSON)	(07/01/2010-04/30/2016)
4725 TURNER DR, BIRMINGHAM, AL 35215	(JEFFERSON)	(08/19/2009-03/01/2011)
1117 OAKWOOD ST, BIRMINGHAM, AL 35215	(JEFFERSON)	(04/06/2007-10/01/2010)
9801 W GIRTON DR APT D128, DENVER, CO 80227	(JEFFERSON)	(11/01/2002-09/05/2003)
190 MAGPIE LN, BAILEY, CO 80421	(PARK)	(10/06/1999-12/31/2014)
8000 W CRESTLINE AVE APT 1028, LITTLETON, CO 80123	(JEFFERSON)	(09/01/1998-12/31/2006)
5253 TYLER LOOP RD, PINSON, AL 35126	(JEFFERSON)	(06/01/1997-10/25/2008)
PO BOX 1, SYCAMORE, AL 35149	(TALLADEGA)	(12/17/1996-12/31/1998)
89 MAINSTREET ST, SYCHOMORE, AL 35149	(TALLADEGA)	(05/13/1996-12/31/1996)
1127 23RD ST S APT F2, BIRMINGHAM, AL 35205	(JEFFERSON)	(03/01/1996-12/31/1996)
120 GRANDVIEW DR, BIRMINGHAM, AL 35214	(JEFFERSON)	(10/01/1995-12/31/1997)
32 15TH TERRACE, BIRMINGHAM, AL		(04/01/1994)
6303 LANE ST, PINSON, AL 35126	(JEFFERSON)	(02/01/1992-12/31/1993)
549 TYLER LOOP, PINSON, AL 35126	(JEFFERSON)	(12/31/1991)
3215 TERR NE, BIRMINGHAM, AL		(09/01/1991)
2312 RAINTREE CT APT J, BIRMINGHAM, AL 35215	(JEFFERSON)	(07/01/1989-12/31/1992)
1011 26TH AVE N, BESSEMER, AL 35023	(JEFFERSON)	(10/01/1987-12/31/1991)
129 E STERLING CIRCLE, BIRMINGHAM, AL 35215	(JEFFERSON)	(07/01/1987-10/01/1990)
445 DEL RIO DR, BIRMINGHAM, AL 35235	(JEFFERSON)	(12/31/1983-12/31/1991)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** Yes

COURTNEY M WHITLEY

Alias(es)

COURTNEY M WHITLEY
COURTNEY WHITLEY

DOB(s)

01/07/1979 (42)

COURTNEY MAYE WHITLEY
COURTNEY M LABUKAS
COURTNEY MAYE LABUKAS
WHITLEY COURTNEY
COURTNEY LABUKAS
COURTNE LABUKAS
COUTNEY WHITLEY

Last Seen Email Address:
COLETTE@LONGREALTY.COM

SSN(s)

527-95-XXXX

Issued in Arizona, 1982

Top Phones

Phone	Type	Last Seen	Provider
520-312-0244	Cellular	02/09/2018	NEW CINGULAR WIRLESS
520-273-2836	Cellular	04/09/2016	METROPCS, INC.
520-881-0810	Residential	12/04/2020	QWEST CORPORATION

Address (County/Parish/Borough) History:

2607 N MARTIN AVE UNIT 1, TUCSON, AZ 85719	(PIMA)	(02/01/1997-Current)
3700 N CAMPBELL AVE APT 810, TUCSON, AZ 85719	(PIMA)	(07/06/2019-12/14/2020)
5353 E 22ND ST APT 808, TUCSON, AZ 85711	(PIMA)	(12/28/2017-03/01/2021)
2032 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(06/01/2009-10/28/2017)
3231 E BLACKLIDGE DR, TUCSON, AZ 85716	(PIMA)	(01/01/2009-12/31/2009)
4461 E CALADIUM PL, TUCSON, AZ 85712	(PIMA)	(02/01/2007-12/31/2008)
7522 E PT NINCI DR, TUSCON, AZ 85730	(PIMA)	(12/16/2004)
7522 E POINCIANA DR, TUCSON, AZ 85730	(PIMA)	(08/27/2004-03/01/2007)
2943 E 17TH ST, TUCSON, AZ 85716	(PIMA)	(07/18/2002-12/31/2004)
1001 W SAINT MARYS RD APT 316, TUCSON, AZ 85745	(PIMA)	(08/06/2001-03/01/2007)
PO BOX 65866, TUCSON, AZ 85728	(PIMA)	(07/01/2001)
7212 E LUANA PL, TUCSON, AZ 85710	(PIMA)	(02/01/2001-12/31/2002)
6110 E 5TH ST APT 302, TUCSON, AZ 85711	(PIMA)	(11/01/1999-06/01/2007)
2769 N MARTIN AVE UNIT 2, TUCSON, AZ 85719	(PIMA)	(07/01/1999-08/01/1999)
PO BOX 7847, FLAGSTAFF, AZ 86011	(COCONINO)	(06/01/1999-01/27/2002)
4535 N OSAGE DR, TUCSON, AZ 85718	(PIMA)	(06/01/1997)
502 N SILVERBELL RD, TUCSON, AZ 85745	(PIMA)	
2107 S MARCH PL, TUCSON, AZ 85713	(PIMA)	(06/21/2012)

Bankruptcies: No **Liens:** No **Judgments:** Yes **Possible Criminal/Infractions:** Yes **Business Affiliations:** No

Properties: No **Motor Vehicles:** Yes **Employment:** No

EMERSON T WHITLEY

Alias(es)

EMERSON T WHITLEY
EVERSON T WHITLEY
EMERSON WHITLEY
EMERSON E WHITLEY

DOB(s)

10/XX/1976 (45)

Last Seen Email Address:

None Found

SSN(s)

527-95-XXXX

Issued in Arizona, 1982

Top Phones

Phone	Type	Last Seen	Provider
415-759-5264	Residential	09/01/2021	PACIFIC BELL
415-834-5577	Residential	03/02/2011	COMCAST IP PHONE LLC
415-923-3750	Residential	11/01/2009	PACIFIC BELL

Address (County/Parish/Borough) History:

125 SANTA PAULA AVE, SAN FRANCISCO, CA 94127	(SAN FRANCISCO)	(11/01/2009-Current)
2032 E BLACKLIDGE DR, TUCSON, AZ 85719	(PIMA)	(05/29/2009-02/06/2017)
451 KANSAS ST UNIT 428, SAN FRANCISCO, CA 94107	(SAN FRANCISCO)	(06/01/2008-05/30/2009)
415 MISSISSIPPI ST, SAN FRANCISCO, CA 94107	(SAN FRANCISCO)	(08/01/2006-04/26/2008)
1151 WASHINGTON ST, SAN FRANCISCO, CA 94108	(SAN FRANCISCO)	(08/01/2003-08/01/2006)
40 E 52ND ST, NEW YORK, NY 10022	(NEW YORK)	(04/29/2003)
343 SANSOME ST STE 1210, SAN FRANCISCO, CA 94104	(SAN FRANCISCO)	(08/01/2002-09/01/2008)
1165 BAY ST APT 7, SAN FRANCISCO, CA 94123	(SAN FRANCISCO)	(07/01/2002-12/31/2002)
162 W 80TH ST APT 2G, NEW YORK, NY 10024	(NEW YORK)	(07/01/2000-12/31/2001)
PO BOX 205953, NEW HAVEN, CT 06520	(NEW HAVEN)	(10/15/1997)
342 ELM ST, NEW HAVEN, CT 06511	(NEW HAVEN)	(12/31/1996-12/31/1999)
PO BOX 204699, NEW HAVEN, CT 06520	(NEW HAVEN)	(12/31/1994-12/31/1996)
18 CORNELIA ST, NEW YORK, NY 10014	(NEW YORK)	(12/01/1994)
2607 N MARTIN AVE UNIT 2, TUCSON, AZ 85719	(PIMA)	(10/23/1994-07/01/2000)

Bankruptcies: No **Liens:** No **Judgments:** No **Possible Criminal/Infractions:** No **Business Affiliations:** Yes

Properties: Yes **Motor Vehicles:** No **Employment:** Yes

Business	None Found
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Professional License	None Found
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Roger J. Cooper
 December 9, 2014 ·

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 6y

William R. Jahn
 great !!
 6y

Kathleen Clement
 All together now.
 6y

Skee Teleki
 lots of Coopers - how fun!
 6y

Case Number: A-21-837948-C

With Lyrics

Marty Robbins

YouTube

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Chat

Spaces

Meet

On Wed, Nov 17, 2021 at 1:42 PM Nathaniel Drum <nathaniel.drum@unlv.edu> wrote:

Ashleigh,

I was contacted by a person named Lisa Breslaw, who stated she is filing a civil lawsuit and is requesting an affidavit stating she is not in UPD Master Name. I checked Master Name and confirmed she is not entered in our database.

Her contact information is below:

Name: Lisa Breslaw
Phone: 702-488-6989
Email: lisa.breslaw@alumini.unlv.edu

Thank you.

Nate Drum,
Detective
University Police Services
University of Nevada, Las Vegas
4505 South Maryland PKWY Box 452007
Las Vegas, NV 89154
(702) 895-3668 Main
(702) 937-0282 Direct
(702) 895-3454 Fax

2 of 526

12:10

Robert X

[illegible]

perceptibles 23 points - 9 months ago

I think I know who this is too. . . .

Give Award Share Report Save

2000年12月20日 星期二

monic 114 points - 9 months ago

was once stalked by a woman suffering from serious mental illness. I was 18 and had a moderately popular tumblr blog. She was convinced many posts were secretly about her. I immediately deleted the blog over it. This woman made 65 accounts solely dedicated to stalking alongside one other person. She got the other person's home address. Never got mine; not want of trying. The other person had a hellish ordeal but was ultimately okay.

is stuff can be scary. Be careful with people like this.

Award Share Report Save

Scammern 12 points - 9 months ago

The other person wasn't a realtor, were they?

Give Award Share Report Save

int 54 points - 9 months ago

and her saga as well.

my opinion, she needs a therapist before she does further damage.

1. Be Civil/Do not advocate violence
2. Do not offer/solicit legal advice.
3. Do not continue linked threads
4. Threads must be 12 hours old
5. Only posts from r/legaladvice and similar
6. Embargoed Topics
7. No Doxxing
8. Do not use Pokemon themed titles
9. No republicizing of deleted comments
10. No username pings unless active in thread
11. No Editorialized Titles
12. No more than 3 posts every 24 hours

In the Press

VICE - Inside the Reddit Forum Where Panicked

Can OP sue an anonymous Redd

New Tab

Inbox (9) - breslaw@univ.nevad

DD Discussion Thread, Septem

+

←→↻

https://www.reddit.com/r/bestoflegaladvice/comments/eu05y/can_op_sue_an_anonymous_redditor_for_libel/

reddit

r/bestoflegaladvice

Search

Get Coins

PrestigiousBread3458

179 karma

↑

xxokaralee

23 points · 9 months ago

Give Award

Share

Report

Save

↑

Yep, did the same and HOLY SHIT WHAT A RABBIT HOLE THAT IS. Like, Lifetime Movie wow. Hope they get some much needed help :(

Give Award

Share

Report

Save

↑

sond1369

MLW Butthole Posse

37 points · 9 months ago

Give Award

Share

Report

Save

↑

Better watch what you say or you'll be next to be sued

Give Award

Share

Report

Save

↑

pombe

9 points · 9 months ago

Give Award

Share

Report

Save

↑

Jesus.... i believe the clinical term is "Nutty as Squirrel Turds"

Give Award

Share

Report

Save

Comment removed by moderator

9 months ago

Comment removed by moderator

9 months ago

↑

eka5245

Church of the Holy Oxford Comma

34 points · 9 months ago · edited 9 months ago

↑

/hell yes/

Edit: HELL NO.

How did this person expect to handle graduate school AT ALL, let alone after they destroyed their own future and I kept reading and it kept getting worse holy S H I T.

Give Award

Share

Report

Save

In the Press

VICE - Inside the Reddit Forum Where Panicked People Ask Strangers for Legal Help

Related Communities

r/legaladviceoftopic

91,940 members

JOIN

Historical BestOf posts

Before we had the subreddit, we had the BestOf Posts. Review the historical best:

BEST OF /R/LEGALADVICE 1

BEST OF /R/LEGALADVICE 2

Moderators

MESSAGE THE MODS

u/Ramady Lord of the Bol Arinas

9:50

ADVERTISEMENT



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UNLV

UNIVERSITY OF NEVADA, LAS VEGAS

Quality Assurance and Financial Compliance

UNLV Home / QAFC Home / Review Process / Quality Assurance & Financial Compliance Protocols / Concern and Complaint Process and Investigation

Concerns

A concern indicates a level of dissatisfaction in regard to a person or service within the university and a request for information and/or resolution. Taking concerns seriously at the earliest stage will reduce the numbers that would develop into formal complaints.

Concern Process

Electronically Filed

12/9/2024 12:57 AM CES

Steven D. Grierson

CLERK OF THE COURT

Steven D. Grierson

Any complaint which does not meet the definition of a formal complaint shall be considered an informal complaint with resolution being attained at the lowest possible level.

Not all complaints will require a formal investigation. Depending on the nature of the complaint, sometimes an informal and prompt inquiry provides the stakeholder all the information needed to accept the conclusion and resolution of their complaint. For example:

- Complaints requiring an investigation will be processed and investigated in accordance with the relevant university policy or procedure. Depending on the nature of the complaint, investigations may be referred to the appropriate university support liaison for help.

The tracking and monitoring of complaints will be the responsibility of the assigned university support liaison through completion of the investigation process. The assigned university support liaison will be responsible for notifying the complainant in writing upon completion of the investigation and where appropriate, the outcome and actions taken by the university to the extent permitted by law.

When credible allegations arise that threaten students, staff or workplace safety, the university support liaison will immediately contact UNLV Department of Police Services. The appropriate department and/or administrator/supervisor will also be notified to determine the veracity of the allegations and the appropriate action to be taken.

♂

When credible allegations arise that threaten students, staff or workplace safety, the university support liaison will immediately contact UNLV Department of Police Services. The appropriate department and/or administrator/supervisor will also be notified to determine the veracity of the allegations and the appropriate action to be taken.

A complaint or request for an investigation should include the following information:

- Who is involved?
- What is the allegation?
- When did the incident take place?
- Where did the incident take place? Single event or multiple events?
- How it happened?
- Were there witnesses? Who?

This information will assist the appropriate support liaison determine whether an allegation warrants a criminal or administrative investigation.



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
16
17 Title of Nonconforming Document:

Motion for Leave to File Sur-
Reply to Defendant's Motion to
Dismiss

18 Party Submitting Document for Filing:

Plaintiff

19 Date and Time Submitted for Electronic
20 Filing:

12/08/2021 at 10:51 PM

21 Reason for Nonconformity Determination:

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

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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: 10th day of December, 2021

By: /s/ Chaunte Pleasant
Deputy District Court Clerk

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CERTIFICATE OF SERVICE

I hereby certify that on December 10, 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



EXHIBIT INDEX SHEET
ADDITIONAL EXHIBIT TO SUR-REPLY RE: REPLY RE: DEFENDANT'S MOTION TO
DISMISS

Exhibit 36- Plaintiff's medical records showing that:

1) Plaintiff has generalized anxiety disorder and obsessive compulsive disorder (conditions defendant knew about and mocked her for). Thus, according to the elements required to find outrageous conduct, Defendant "emotionally harmed a Plaintiff known to be especially vulnerable." (See SUR-REPLY RE: REPLY RE: DEFENDANT'S MOTION TO DISMISS, p. 13)

2) Plaintiff consulted with her physician about Defendant's conduct and reported that it had caused her to experience chest tightness and tachycardia/palpitations

3) Plaintiff took medication for these symptoms

4) Plaintiff had planned to take the GRE (i.e. had discussed accommodation with her physician) but then didn't take it due to her distress from Defendant's harassment (and that which they incited)

5) Plaintiff does not have borderline personality disorder, a more severe and stigmatized disorder that people on Reddit were saying that she had based on Defendant's post. This too damaged her reputation.

***Plaintiff wants to clarify that the phrase "when Covid resolves" in her medical records was referring to the pandemic ending; Plaintiff has not had symptoms of nor tested positive for Covid, and she is fully vaccinated.

Steven D. Grierson

General Clinic Note (Physician)

Breslaw, Lisa D - 77868

Document Has Been Revised And Contains Addenda

Chief Complaint

Forms for work, swollen lymph node under right side of jaw (less than a week), wants to discuss a lawsuit she is filing.
Patient has received and reviewed Telehealth consent via e-mail. Patient has verbally agreed to receive telehealth services.

History of Present Illness

Today's Visit: 7/22/2021

Last visit: 11/17/2020

CC: Virtual

Stress/anxiety:

- patient is suing someone for libel and emotional distress
- she feels like her ability to be accepted to be grad school has been affected by this
- she experienced severe worsening of her anxiety: chest tightness, palpitations
- was not able to seek therapy because she did not have insurance at the time
- she required benzo medications to help with the stress
- she was having problems with concentration so, she had to postpone the GRE

Swollen lymph node:

- Under the right side of the jaw; has been present for a week; hard and swollen
- no tooth pain, has flu-like sx's (fatigue/exhaustion), post-nasal drip
- no fever
- has had episodes in the past that resolve on their own

Left breast lump:

- has history of fibrocystic tissues; thinks she may feel a new lump
- painful lump; doesn't think it's changed in size
- Left breast ultrasound 11/2020:
 1. Previously biopsied fibroadenoma has increased in size.
 2. Newly palpable mass likely fibroadenoma.
 3. New oval circumscribed mass at 3:00 likely fibroadenoma.
- Radiology recommends bilateral mammogram, biopsy for interval growth of 2:00 lesion, biopsy of new 5:00 lesion
- Also need to repeat breast ultrasound in 6 months
- Left 2:00: Fibroepithelial lesion with moderately increased stromal cellularity.
- Surgical excision is recommended.
- Left 5:00: Cellular fibroadenoma

GAD/OCD:

- has GRE upcoming and they are doing at home testing; she would need to buy a new computer if she needed to take it at home
- if she were to take it at a facility, she would need accommodations for single room due to her severe OCD and phobia of germs
- takes diazepam PRN; last filled 7/2019
- will get very anxious if she is out walking around in desolate areas; she gets anxious about the thought of something happening in public and no one around to call for help; will become panicked, dizzy
- thinking about applying to the disability transit when COVID resolves
- may need accommodations if she is accepted to grad school (leaving the class if someone is sick, etc)

Recent labs

Patient Information

Name: Breslaw, Lisa D

Address: 5070 Shady Palms Street
LAS VEGAS, NV 89131

Sex: Female

Date of Birth: 06/11/1982

Phone: (702) 488-6989

MRN: 77868

FIN: 1748320

Location: Jacobs Medical Associates

Date of Service: 07/22/2021

Primary Care Physician:

Major MD, Ashley R, (725) 333-8400

Attending Physician:

Major MD, Ashley R, (725) 333-8400

Problem List/Past Medical History Ongoing

Aching leg syndrome 3/18 Left lower
art us=neg, left lower venous us=neg,
3/18 1 week after sitting doing a
project sitting with legs crossed, now
with leg achy ,
Cardiac murmur due to mitral valve
disorder 5/16 prominent murmur 2nd
ICS 6/16 Echo=murmur 9/16 dr fonte
Treadmill=neg HOLTER=normal
Cellulitis 8/18 small prob started as a
bug bite****rx doxycycline MUCH
BETTER 90% only residual nontender
remainder region but no cellulitis, just
residual scar discolorization, 9/18 Pt
requests add AB augmentin 500 bid
Change in nail appearance
Chest pain
Chin laceration
Chronic UTI 2/18 NEW dr sarah ryan=
repeat UA neg so follow 6 mo 6/18 dr
ryan Repeat cystoscopy (pressure with
urination)= US renal=
Comments: ***dr laurie larsen**
9/16 cystoscopy=neg,* 9/16 renal
us=dial renal pelvis resolved post
void, 10/17 UTI Kleb ALLERGY To
Quinolones and eryth and Ceph
Diarrhea *****100% resolved *****
mild x 1 week 6/16 Rx imodium 7/16
RESOLVED , soft belly RESOLVED 11/17
abd us=neg
Elevated fasting glucose 5/17 FBS 119
so repeat FBS=83 Hg a1c=5.4
microalb=ok
Environmental allergies

Printed by: Mendez MA, Emilio
Printed on: 12/3/2021 10:51 AM PST

Page 1 of 6



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:	Motion for Leave to File Sur- Reply to Defendant's Motion to Dismiss
Party Submitting Document for Filing:	Plaintiff
Date and Time Submitted for Electronic Filing:	12/08/2021 at 10:51 PM

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: 14th day of December, 2021.

By: /s/ Chaunte Pleasant
Deputy District Court Clerk

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CERTIFICATE OF SERVICE

I hereby certify that on December 14, 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

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 [46] Motion for Leave to File Sur-Reply to Defendant's Motion to Dismiss in the above-entitled matter is set for hearing as follows:

Date: January 20, 2022
Time: Chambers
Location: Chambers
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/ Kadir Beckom
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/ Kadir Beckom
Deputy Clerk of the Court



ERRATA FOR MOTION FOR LEAVE
TO FILE A SUR-REPLY TO DEFENDANT'S
MOTION TO DISMISS AND THE ATTACHED SUR-REPLY

The title of the motion should be "MOTION TO FILE A SUR-REPLY TO DEFENDANT'S REPLY
RE: DEFENDANT'S MOTION TO DISMISS"

The first point of the motion should read, "That she admits that she does not even know whether
it was Defendant that caused her harm " (Corrected from admits that does not even know...)

The sentence (p.10-11) should read "For example, they claimed that they 'kept an eye on these
threads because Plaintiff said she wanted to sue them, (see exhibit 13) but they (Defendant)
had obviously been following her accounts and saving her posts since she joined Reddit (or
soon thereafter)--with the intention of harassing and libeling her."

The sentence "...nor did she ever reach out to Dr. Gallo outside of the UNLV..." (page
12/defamation) should read, "...nor did she ever reach out to Dr. Gallo outside of UNLV..."

Plaintiff also wants to clarify the use of the word "likely" in the sentence (p.12), "Therefore,
Defendant likely knew..." Plaintiff believes that Defendant knew that his story was false, or at a
minimum, acted with reckless disregard for the truth, and the word "likely" was used to convey
that Plaintiff believes the former situation (knowing with certainty that his story was false) was
more likely than "reckless disregard for the truth." She was not expressing doubt or uncertainty
that she was defamed.

The second paragraph of page four should read, "Furthermore, even if any of Defendant's
subsequent harassing comments would not be actionable if occurring once, as evidenced by the
dates (not "date's) on Plaintiff's exhibits..."

The Declaration date should be "this 8th of December."



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

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

Lisa Breslaw
Plaintiff

Case No. A-21-837948-C
Dept. 3
Hearing Requested
On Shortened Time

Vs.

Peter Cooper
Defendant

**EX PARTE MOTION FOR CONTINUANCE
(HEARING REQUESTED ON SHORTENED TIME)**

COMES NOW, the PLAINTIFF in the above-entitled matter and moves this Honorable Court for an Order granting a continuance. This motion is brought in good faith and is based on the following:

1. There is a hearing currently scheduled in the above-referenced case on Jan. 4, 2022 at 9:00 a.m.
2. The other party will not agree to continue a hearing date because:

Defendant, through their attorney, states that any exhibits should have been filed at the time of the opposition, and that "The motion you have filed includes language that specifically attempts to counter our reply and is *not* solely a motion to include another exhibit or two."

3. I am requesting a change to the court date because:

The motion to file my sur-reply to Defendant's Reply Re: Defendant's Motion to Dismiss will be heard on January 20th, 2022, but the motion to dismiss is being heard on January 4.

The reason this sur-reply was needed was because in their Reply Re: Defendant's Motion To Dismiss, Defendant, through their attorney, made several false statements which misstated and misrepresented the arguments I presented in my opposition. Thus, this is new information that I had not had the chance to contest in the opposition.

I also could not file all my exhibits at the time of my opposition because 1) I was waiting on records from Reddit (which I'm still waiting on and wanted to show the Court that I am working with their attorneys to obtain them) and 2) I had to wait until after the Thanksgiving holiday to obtain the statement from UNLV's police services showing that they do not have records on me. I then experienced medical symptoms that impaired my ability to file my intended Supplemental Memorandum (see exhibit 21). Considering that Defendant is claiming that I literally (as defined by NRS 200.575) stalked my former professor, this exhibit is crucial to supporting my claim of libel per se.

4. If Granted, I ask the court to reschedule the court date to:

Any time after January 20, 2020, when the motion for leave to file my sur-reply will be heard

I respectfully request the Court continue the court date as requested above, and any other relief as the Court finds appropriate.

DATED THIS 16th of December, 2021

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

DECLARATION IN SUPPORT OF MOTION

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

I am the Movant in the above-entitled action. I have read the foregoing Ex Parte Motion for Continuance, and know the contents thereof. The Motion is true of my own knowledge except as to those matters based on information and belief, and as to those matters, I believe them to be true.

DATED THIS 16th day of December, 2021

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

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 Ex Parte Motion for Continuance (Hearing Requested on Shortened Time) in the above-entitled matter is set for hearing as follows:

Date: February 08, 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/ Chaunte Pleasant
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/ Chaunte Pleasant
Deputy Clerk of the Court



EXHIBIT 37 (Index Sheet)
Reddit's Response

Exhibit 37: This is Reddit's latest response to Plaintiff, stating that they are "awaiting the outcome of the motion to dismiss before further action will be taken with respect to the subpoena."

Thus, if the case is continued, it seems like they will provide the requested basic subscriber information for both Defendant's main accounts and the troll accounts impersonating/mentioning UNLV faculty. If Defendant was behind these troll accounts, that will 1) further show intention to inflict emotional distress and 2) further show that they intentionally targeted a NV public institution. To clarify, Plaintiff is both certain and has ample evidence showing that Defendant was the one who created the libelous SRD post (accusing Plaintiff of stalking her former professor etc.). However, showing that Defendant was behind these troll accounts will significantly support Plaintiff's claims and is another reason why this case should not be dismissed.

Electronically Filed
12/21/2021 9:10 PM
Steven D. Grierson
CLERK OF THE COURT

Search all conversations

Compose

Mail

Inbox 80

Starred

Snoozed

Chat

No conversations
Start a chat

Spaces

No spaces yet
Create or find a space

Meet

3

Sandhu, Saroop (Perkins Coie)

Ms. Breslaw, We are working on your request and will have an answer for you soon.

Sandhu, Saroop (Perkins Coie)

to me, Julie

Ms. Breslaw,

Thank you for your patience. We have reviewed the docket, and we understand that Defendant has filed a motion to dismiss your claims. Reddit intends to await the outcome of the motion to dismiss before taking any further action with respect to the subpoena. Please let us know when the Court issues an order on the motion.

In the meantime, Reddit preserves and does not waive any available rights and objections.

Reply Reply all Forward

Case Number: A-21-837948-C



1 **OPPM**

2 Sagar Raich, ESQ.
3 NEVADA BAR NO. 13229
4 6785 S. Eastern Ave. Ste. 5
5 Las Vegas, NV 89119
6 Telephone: (702) 758-4240
7 Facsimile: (702) 998-6930
8 Email: sraich@raichattorneys.com
9 Attorney for Defendant, Peter Cooper

6 **DISTRICT COURT
CLARK COUNTY, NEVADA**

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

7 LISA BRESLAW;
8 Plaintiff(s),
9 vs.
10 PETER COOPER,
11 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**

12 Defendant PETER COOPER ("COOPER" or "Defendant"), by and through Sagar Raich,
13 Esq. of Raich Law PLLC, hereby files this Opposition to Motion for Leave to File Sur-Reply to
14 Defendant's Motion to Dismiss and Opposition to Ex Parte Motion for Continuance. This
15 opposition is made and based upon the pleadings and papers on file, the attached memorandum
16 of points and authorities, and any oral argument that the Court may entertain at the time of the
17 Hearing on this matter.

18 Dated this 22nd day of December, 2021. /s/ Sagar Raich

19 SAGAR RAICH
20 NEVADA BAR 13229
21 RAICH LAW PLLC
6785 S. Eastern Ave., Suite 5
Las Vegas, NV 89119

1 Attorney for Defendant, Peter Cooper

2 **MEMORANDUM OF POINTS AND AUTHORITIES**

3 **I. INTRODUCTION**

4 Plaintiff has done exactly what Defendant was worried about – filing frivolous motions
5 once Plaintiff’s arguments are examined and determined to be faulty. Now, having had the ability
6 to oppose Defendant’s motion to dismiss, Plaintiff is attempting to have another bite at the apple.
7 Unfortunately for Plaintiff, such an attempt is not only improper, but procedurally barred.
8 Plaintiff’s attempt at delaying the hearing on Defendant’s Motion to Dismiss is similarly flawed.

9 Through this Opposition, Defendant requests that the court deny the Plaintiff’s frivolous
10 motions, grant Defendant reasonable attorneys’ fees as a sanction for Plaintiff’s bad faith
11 litigation tactics intended only to run up Defendant’s costs, and strike Plaintiff’s filings with
12 prejudice.

12 **II. APPLICABLE STANDARD**

13 *A. Standard regarding Sur-Reply*

14 Once a party files a motion, the adverse party may file an opposition, after which the
15 movant may file a reply brief. *See* EDCR 2.20. “Any affidavit supporting a motion must be
16 served with the motion.” NRCP (6)(c)(2). “On motion and reasonable notice, the court may, on
17 just terms, permit a party to serve a supplemental pleading setting out any transaction,
18 occurrence, or event **that happened after the date of the pleading** to be supplemented”
19 (emphasis added). NRCP 15(d). “By presenting to the court a pleading, written motion, or other
20 paper ... an ...unrepresented party...certifies that... it is not being presented for any improper
21

1 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of
2 litigation...” NRCP (11)(b)(1).

3 *B. Standard regarding Continuance*

4
5 “A request for a continuance is evaluated under the circumstances of each case; however,
6 if the continuance was denied, the appellant must demonstrate that he or she was prejudiced by
7 the district court's decision.” *Brown v. State*, No. 53891, 2011 Nev. Unpub. LEXIS 1272, at *2
8 (Feb. 3, 2011) citing *Higgs v. State*, 126 Nev. 1, 9, 222 P.3d 648, 653 (2010) citing *Rose v. State*,
9 123 Nev. 194, 206, 163 P.3d 408, 416 (2007). “If a defendant fails to demonstrate that he was
10 prejudiced by the denial of the continuance, then the district court's decision to deny the
11 continuance is not an abuse of discretion.” *Higgs v. State*, 126 Nev. 1, 9, 222 P.3d 648, 653
12 (2010).

13 **III. SUR-REPLY TO REARGUE AN OPPOSITION IS IMPROPER**

14 It is well established procedure that after a motion is filed, the non-movant files an
15 opposition, followed by a reply brief by the movant. *See* EDCR 2.20. Civil procedure dictates
16 that the non-movant can only file an argument after the reply if there is new information that
17 could not have been argued in the opposition. *See* NRCP 15(d). Otherwise, a party can keep
18 filing fugitive pleadings and increase the cost of litigation – as Plaintiff in this matter is doing.

19 Plaintiff cites a non-binding case from the Federal District Court of another jurisdiction,
20 *Lewis vs. Rumsfeld*, 154 F. Supp 2d 56, 61 (D.D.C.2001), as a basis for having this Court grant
21

1 the leave to file the sur-reply. Even assuming the case to be applicable, unfortunately for

2 Plaintiff, in *Lewis*, the D.C. court **denied** Plaintiff's motion to file a sur-reply holding that:

3 "The plaintiff in her motion for leave to file a surreply fails to address any new matters
4 presented by the defendants' reply. The plaintiff contends that the defendants have
5 mischaracterized her position Because this contention does not involve a new matter but
6 rather an alleged mischaracterization, the court denies the plaintiff's motion."

7 *Lewis v. Rumsfeld*, 154 F. Supp. 2d 56, 61 (D.D.C. 2001).

8 In this matter, Plaintiff is alleging exactly what the D.C. court stated is not a proper
9 reason to file a sur-reply: that Defendant "misrepresented and mischaracterized several of
10 Plaintiff's statements and arguments..." See Motion for Leave to File Sur-Reply, pg. 1, on file
11 herein.

12 The only "new evidence" Plaintiff attempts to include is "her original abstract and
13 proposal," which unfortunately has nothing to do with the motion to dismiss and the grounds
14 therein – the motion to dismiss is not a motion based on evidence and the credibility thereof
15 (unlike a motion for summary judgment), but rather a motion relying upon various precedence
16 and rules of law to seek dismissal of this matter as a matter of law based on the allegations that
17 Plaintiff herself has alleged in her Complaint.

18 As such, given that Plaintiff is not allowed to keep filing fugitive pleadings after the
19 Defendant's reply brief is filed, given that Plaintiff is attempting to use 'mischaracterization' as
20 grounds for sur-reply, given that such grounds (even in sister-jurisdictions that Plaintiff cites) are
21 improper, and given that Plaintiff did not include any material information that was not available

1 at the time of Plaintiff's opposition, Defendant requests that Plaintiff's frivolous motion to file a
2 sur-reply be denied and stricken with prejudice.

3 ...

4 ...

5 **IV. HEARING THIS MATTER, AS SCHEDULED, DOES NOT PREJUDICE PLAINTIFF**

6 Plaintiff's ex parte motion for continuance relies essentially on the same allegations as
7 her motion to file a sur-reply – that “Defendant...[in the reply brief] made several false
8 statements which misstated and misrepresented the arguments [she] presented in [her]
9 opposition. Thus, this is new information that [she] had not had the chance to contest in the
10 opposition.” See Ex Parte Motion for Continuance, pg. 2, on file herein. Plaintiff does not
11 include any case law, statutory law, or any other basis to seek such a continuance. *Id.*
12 Furthermore, Plaintiff does not demonstrate how the Plaintiff would be prejudiced by the denial
13 of the continuance. See *Higgs v. State*.

14 Given that the Plaintiff's own cited case in her motion to leave to file the sur-reply has
15 the holding *against* the Plaintiff from being granted leave of court, given that Plaintiff has failed
16 to show how she would be prejudiced by not having the hearing continued, and given that
17 Plaintiff is simply attempting to delay this matter and cause frivolous and fugitive filings,
18 Defendant requests that this Court deny the Plaintiff's motion for continuance.

19 **V. PLAINTIFF'S FRIVOLOUS FILINGS JUSTIFY GRANTING OF ATTORNEYS'**
20 **FEES TO DEFENDANT**

1 Nevada Revised Statutes provide that “The Court may make an allowance of attorney’s
2 fees to a prevailing party ... when the Court finds that the claim...of the opposing party was
3 brought or maintained without reasonable ground or to harass the prevailing party.” Nev. Rev.
4 Stat. § 18.010(2). “A claim is frivolous if it is utterly lacking in legal merit...” *U.S. ex rel. J.*
5 *Cooper & Associates, Inc. v. Bernard Hodes Group, Inc.*, 422 F. Supp. 2d 225, 238 (D.D.C.
6 2006). Additionally, a frivolous claim is the equivalent of a groundless claim. *See United States*
7 *v. Capener*, 590 F.3d 1058, 1066 (9th Cir. 2010). Under Nevada law, a claim is frivolous if it is
8 “not well grounded in fact and warranted either by existing law or by a good faith argument for
9 the extension, modification, or reversal of existing law.” *Simonian v. U. and Community College*
10 *System of Nevada*, 122 Nev. 187, 196, 128 P.3d 1057, 1063 (2006).

11 In this matter, reasonable attorneys’ fees should be provided to Defendant for having to
12 respond to Plaintiff’s frivolous motions.

13 First, Plaintiff’s attempt to have continued bites at the apple and attempt to re-argue her
14 positions, claiming Defendant’s ‘mischaracterization’ of her argument, has been demonstrated to
15 not be a valid reason to seek to file a sur-reply. In fact, the case Plaintiff cites, holds that a
16 ‘mischaracterization’ argument is not a valid reason to file a sur-reply.

17 Second, Plaintiff’s motion to seek continuance does not even attempt to mention any law
18 upon which the motion should be granted and is therefore “not well grounded in fact and
19 warranted...by existing law...” *Id.* As such, Plaintiff knew or should have known that her
20 frivolous motion filings will result in attorneys’ fees and costs to be incurred by the Defendant –
21 costs that the Plaintiff should be responsible for.

1 Finally, Defendant, worried about Plaintiff's frivolous filings specifically included the
2 following in the Reply to Defendant's Motion to Dismiss: "PURSUANT TO EDCR 2.20,
3 DEFENDANT REQUESTS ANY FILINGS SUBMITTED BY PLAINTIFF AFTER THE
4 SUBMISSSION OF THIS REPLY TO BE STRICKEN WITH PREJUDICE." As such, Plaintiff
5 was very clearly on notice that she was not allowed to undertake frivolous filings and that should
6 she do so, that the Defendant would seek any such filings to be stricken. Given that Plaintiff was
7 on notice and still did file frivolous motions, Defendant requests such motions to be stricken with
8 prejudice.

9 VI. CONCLUSION

10 Plaintiff is not allowed to keep filing documents/pleadings after a reply brief is filed.
11 Plaintiff's reason for such filings - alleged "mischaracterization" of Plaintiff's argument by
12 Defendant - is, further, not a valid reason for such filings. Plaintiff's motion for continuance does
13 not include any case law, statutory law, or any basis for the continuance to be granted.
14 Additionally, Plaintiff has not shown this court how failure to grant the motion for continuance
15 would be prejudicial to the Plaintiff. As such, Plaintiff's motion for continuance should be
16 denied.

17 Plaintiff was further on notice to not file the filings that Plaintiff has made and has been
18 on notice that Defendant would seek to strike any such filings. Thus, given the frivolous nature
19 of Plaintiff's motions, Defendant requests that the Court award the Defendant reasonable
20 attorneys' fees in responding to Plaintiff's motions and to strike them with prejudice.

21 DEFENDANT HEREBY OJECTS TO PLAINTIFF RAISING ANY ISSUES IN HER
REPLY BRIEFS THAT EXCEED THE SCOPE OF THIS OPPOSITION AND REQUESTS

1 THAT ANY SUCH ADDITIONAL ARGUMENTS OR ISSUES THAT EXCEED THE SCOPE
2 OF THIS OPPOSITION BE DISREGARDED, STRICKEN, AND DISMISSED WITH
3 PREJUDICE. (“We ... decline to address several claims raised for the first time in [the] reply
4 brief,” *McClain v. State*, 133 Nev. 1048, 392 P.3d 165 (2017); “We need not consider [an]
5 argument because it was raised for the first time in appellant’s reply brief,” *Haynes v. Las Vegas*
6 *Metro. Police Dep’t*, 2020 Nev. App. Unpub. LEXIS 920; “As [the] argument was raised only in
7 [the] reply brief, we need not consider it,” *Weaver v. State*, 121 Nev. 494, 502, 117 P.3d 193,
8 198-99 (2005)).

Dated this 22nd day of December, 2021.

/s/ Sagar Raich
SAGAR RAICH, ESQ.
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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CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2021, I served a true and correct copy of the foregoing:

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

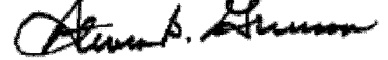
AND

OPPOSITION TO EX PARTE MOTION FOR CONTINUANCE

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
Plaintiff, In Proper Person

DISTRICT COURT
CLARK COUNTY NV

Lisa Breslaw

Case No. A-21-837948-C

Plaintiff

Dept. 3

vs.

Peter Cooper

Defendant

**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**

Plaintiff LISA BRESLAW ("Breslaw" or "Plaintiff"), hereby files this reply to Defendant, Peter Cooper's ("Cooper" or "Defendant") Opposition to Plaintiff's Motion for Leave to File Sur-Reply to Defendant's Motion to Dismiss and their Opposition to Plaintiff's Ex Parte Motion for Continuance. This opposition is made and based upon the pleadings and papers on file, the attached memorandum and points of authorities, and any oral arguments that the Court may entertain at the time of the hearing on this matter.

Dated this 23rd of December, 2021

/s/Lisa Breslaw

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INTRODUCTION

In their opposition to Plaintiff's Leave to File Sur-Reply and Ex Parte Motion for Continuance, and throughout this lawsuit in general, Defendant, now through their attorney, Saigar Raich, Esq. of Raich Law PLLC, is exhibiting the same abusive and harassing behavior that led to this suit in the first place. They are making false statements, taking Plaintiff's words out of context, and are now abusing the court process in an attempt to prevent Plaintiff from presenting her arguments and case to this Court. For example, they preemptively requested that "ANY FILINGS SUBMITTED BY PLAINTIFF AFTER THE SUBMISSION OF THIS REPLY TO BE STRICKEN WITH PREJUDICE." (See Reply Re: Defendant's Motion to Dismiss, p9).

First, as Defendant's attorney acknowledged, "Once a party files a motion, the adverse party may file an opposition, after which the movant may file a reply brief. See EDCR 2.20" Thus, since they filed this opposition to my motion to file a sur-reply and ex parte motion for continuance, I have the right to file this reply.

Plaintiff reserves the right, here and throughout the case, to present and support her arguments and claims to the best of her ability, and to fully pursue this lawsuit, as is allowed by law/civil procedure. And that includes the right, when necessary, to file supplemental pleadings, sur-replies or additional motions, etc. If Defendant is worried about the costs of attorneys' fees or litigation, they should have thought about that before posting their libelous story re: Plaintiff (and UNLV) on Subredditdrama and then harassing her (and inciting others to do the same) for an extended time period—despite knowing that she suffered from an anxiety disorder.

In the following memorandum and points of authority, Plaintiff will address the issues Defendant has raised in their latest oppositions (to Plaintiff's leave to file sur-reply and ex parte motion for continuance) and further show this Court why the sur-reply and continuance of the Jan. 4th 2022 hearing (on Defendant's Motion to Dismiss) are necessary.

MEMORANDUM AND POINTS OF AUTHORITY

SUR-REPLY TO REARGUE AN OPPOSITION IS IMPROPER (PLAINTIFF'S REBUTTAL)

In 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, they, through their attorney, claim that Plaintiff, in moving to file her sur-reply, is "attempting to have another bite at the apple" and increase litigation costs for Defendant. (See Opposition to Motion For Leave To File Sur Reply and Opposition to Ex Parte Motion for Continuance p. 1-5)

However, that is not the case. In their reply Re: Defendant's Motion to Dismiss, Defendant, through their attorney, presented new information that was not included in their original motion.

For example, In their motion to dismiss, Defendant's attorney never claimed that Plaintiff was unsure of Defendant's identity. In fact, at multiple points, he clearly acknowledged that

Defendant made the libelous post which Plaintiff is suing over. For example, at one point he stated "Even assuming Plaintiff's allegations as true, Defendant's post concerned issues of a public institution (UNLV)..." (Defendant's Motion to Dismiss, p 11). That is just one example, but throughout the brief, there was no dispute over Defendant's identity. However, in their reply to Plaintiff's opposition to their motion to dismiss they raised this new issue of Defendant's identity (claiming that Plaintiff only *suspected* Defendant to be the one who libeled and harassed her on Reddit). Essentially, they claimed (for the first time) that Plaintiff was not even sure if she was suing the right person. Therefore, Plaintiff felt obligated to respond and present ample evidence that Defendant is indeed the same Peter Cooper that libeled and harassed her on Reddit. (See exhibits 21-28 and Motion for Leave to File Sur-Reply to Defendant's Motion To Dismiss p.5-6). Had Plaintiff not moved the court to file a sur-reply, and if this Court hears Defendant's motion to dismiss without seeing this evidence, it prejudices Plaintiff because, one, a Court is certainly more likely to dismiss a case if a Plaintiff is not even sure that they're suing the right person. (Defendant, again, was trying to make it appear that Plaintiff was unsure of Defendant's identity.)

In Plaintiff's original opposition, she also said that she was waiting on Reddit to provide the basic subscriber information of certain troll accounts—accounts impersonating UNLV faculty—that she suspects to be Defendant. (Again, the term *suspects* referred to these troll accounts; there was never any uncertainty regarding Defendant's identity or that they libeled and harassed her from their main accounts). At the time of filing her original Opposition to Defendant's Motion to Dismiss, she anticipated having this information before the January 4th hearing. (See Opposition to Defendant's Motion to Dismiss, p2 and exhibit 16). Then, when Defendant, through their attorney, filed their reply: re: Defendant's Motion To Dismiss, Plaintiff still had not received these records from Reddit. Therefore, she wanted to demonstrate to this honorable Court that she was making a good faith effort to obtain these records, as it is crucial in further supporting her claim of intentional infliction of emotional distress and demonstrating why NV jurisdiction is indeed proper. After all, if Defendant was behind these troll accounts harassing Plaintiff under UNLV faculty names, that is certainly behavior targeted against NV (and intending to inflict emotional distress against Plaintiff). Since, however, Defendant filed their reply before she had these records, she needed to include exhibit 22 in her sur-reply to show that she was working on getting this information. (See exhibit 22 and Motion to File Sur-Reply to Defendant's Motion to Dismiss).

Reddit has since responded and said that they are awaiting the outcome of the motion to dismiss before further action will be taken with respect to the subpoena." (See Exhibit 37) This implies that they will provide the requested information if the case is not dismissed. Since this information was not available at the time of Plaintiff's Opposition to Defendant's Motion to Dismiss, it complies with NRCP 15 (d). "On motion and reasonable notice the court may on just terms, permit a party to serve as supplemental pleading setting out any transaction, occurrence, **or event that happened after the date of the pleading** to be supplemented." (See Defendant's Opposition Re: Surreply and Ex Parte Motion, p2)

As stated in Plaintiff's Motion to File a Sur-Reply, part of the reason for her intended supplemental memorandum/pleading was because she had to wait on UNLV's police services to search their records, and then she had to wait until the records clerk returned from an extended holiday vacation before receiving their statement (that they have no records on her). This too is in compliance with NRCP 15(d) (see above paragraph). As stated in her Motion For Leave To File Sur-Reply To Defendant's Motion To Dismiss, she was also incapacitated by certain medical symptoms which further delayed her filing the supplemental memorandum (see exhibit 21). Before she could file the supplemental memorandum, however, Defendant filed their Reply to her Opposition (re: the motion to dismiss) and presented the new issues (listed above and more of which will be discussed in this brief). Thus, since she never had the chance to file the supplemental memorandum, Plaintiff combined the information she would have included in it with her sur-reply. This is not, as Defendant, through their attorney claims ``attempting to have another bite at the apple.``

Furthermore, here is another example of Defendant's false and misleading statements. In their Opposition re: Surreply and Continuance, they, through their attorney claimed that "the only 'new evidence' Plaintiff attempts to include is her 'original abstract and proposal,' which unfortunately has nothing to do with the motion to dismiss and the grounds therein..." (See Opposition re: Surreply and Continuance, p4). First, this is clearly not the only new evidence Plaintiff provided; she also provided a statement by UNLV police services showing that they did not have records on her (see exhibit 30 and above paragraph). In Defendant's Reply Re: Defendant's Motion to Dismiss, they claim that "...the opposition does not even attempt to state that Plaintiff's allegations have met the elements of defamation as required in Nevada." (See Reply RE: Motion to Dismiss p.5). This raised a new issue, since they initially claimed that "Plaintiff's posts and communications with UNLV were their basis for Defendant to seek dismissal for failure to state a claim (see Motion to Dismiss p. 7)."

However, by stating in their Reply Re: Defendant's motion to dismiss that Plaintiff does not even attempt to state that her allegations have met the elements of defamation as required in NV, Defendant was stating a new basis for their dismissal-- that Plaintiff's allegations instead did not meet Nevada's required elements of Defamation. As Defendant pointed out, the first required general element of a defamation claim in NV is "a false and defamatory statement by [a] defendant concerning the Plaintiff..." *Pegasus v. Reno Newspapers Inc.*, 118 Nev. 706, 718, 57 P. 3d 82, 90 (2002). Defendant's main and most egregious/damaging allegation against Plaintiff was that she stalked her former professor, Dr. Marcia Gallo, who was still teaching at UNLV during the period that Defendant claimed Plaintiff engaged in this alleged "stalking." Thus, the surest way for Plaintiff to demonstrate that this allegation is false and defamatory was to obtain a statement from UNLV's police services showing that they had no records on her--and she had to wait for these records, plus there was a delay due her medical symptoms (see exhibits 30 and 21).

Also, Defendant has not even attempted to argue that they used the term "stalking" hyperbolically, plus they clearly presented their story as statements of fact and made specific and demonstrably false claims (i.e. that Plaintiff kept bombarding Dr. Gallo with messages).

Thus, Plaintiff not only needed the opportunity to prove these claims were false (hence exhibit 30), but to prevent Defendant from changing course and arguing that they used the term stalking hyperbolically (after citing NRS 200.575) Plaintiff needed to point out the specific false statements of facts (i.e. bombarding Dr. Gallo with messages etc.) and demonstrate the other 3 elements of defamation. (See Motion for Leave to File Sur-Reply To Defendant's Motion To Dismiss, p. 9-13, Claims For Relief For Defamation) Again, in their Reply Re: Defendant's Motion to Dismiss, Defendant stated a different basis for dismiss for "failure to state a claim."

Getting back to the proposal abstract, despite Defendant's assertion that it has "nothing to do with the motion to dismiss," since Defendant is now claiming that Plaintiff has "not even attempted to meet the elements of defamation," Plaintiff has the right to counter that assertion. Again, defamation is fundamentally based on the falsity of a Defendant's statements/allegations. Thus, in order to even begin to meet the elements of defamation, first and foremost, a Plaintiff must show that the allegations in question are false. In addition to alleging that Plaintiff stalked (as defined by NRS 200. 575) Dr. Marcia Gallo, her former UNLV history professor, Defendant also alleged that this stalking ultimately stemmed from Plaintiff's failure to coerce Dr. Gallo to assist with her oral history project. Specifically, they claimed that Plaintiff told her [Dr. Gallo] that "they would collaborate on it [the project]." Even this allegation alone could and did damage Plaintiff's reputation and grad school prospects, as it makes her seem demanding and difficult to work with (at the very least...not to mention the "stalking" allegation). Thus, by adding exhibit 33, Plaintiff leaves no room for doubt that that allegation is entirely false.

Next, in their Reply Re: Defendant's Motion to Dismiss, Defendant claimed that Plaintiff "does not even know that admissions officials at UNLV and UNR saw her posts." In their initial Motion to dismiss, however, they never challenged Plaintiff's claim that UNR officials saw Plaintiff's posts. Also, Plaintiff, at the time of her Opposition to Defendant's Motion To Dismiss, had not yet had the previously mentioned conversation with Dr. Linda Curcio-Nagy, History Professor and Assistant Dean of UNR's Liberal Arts College. (See Plaintiffs Leave to File Sur-Reply to Defendant's Motion to Dismiss p.8) Furthermore, in Plaintiff's initial email to Dr. Emily Hobson, her preferred graduate advisor at UNR, when she mentioned that Dr. Gallo inspired her into her intended field (History of Sexuality/20th Century History), Dr. Hobson replied "I absolutely understand your admiration for Dr. Gallo." (This email is on Plaintiff's old student account, which is now closed.) Thus, Plaintiff believes this alludes to Dr. Hobson seeing the libelous SRD post. Afterwards, Dr. Hobson stopped communicating with Plaintiff. However, after Plaintiff mentioned the situation (Dr. Hobson not speaking to Plaintiff) to Dr. Curcio-Nagy, she subsequently received a reply from Dr. Hobson (to a follow-up email)--declining to advise her if she reapplied in 2020.

Also, in their Reply Re: Plaintiff's Opposition to Defendant's Motion to Dismiss, Defendant additionally argued that Plaintiff did not know whether *UNLV* admissions officials saw Defendant's libelous post, but Plaintiff was claiming special damages based on her rejection

from UNR. Thus, here was another example of Defendant's fabrications, though it still presented new information that Plaintiff had not previously had the chance to address. Plaintiff was also worried that Defendant, given their history of fabrication and twisting her words, was going to claim that Plaintiff was unsure whether any official at UNLV saw Defendant's SRD post. Again, Debra Pierushka, UNLV's Assistant General Counsel explicitly told Plaintiff that she had seen the libelous SRD post (and, in turn, Plaintiff's "social media activity" [see Complaint, paragraph 33]) and that this post was the reason for this cease and desist letter. (See Motion for Leave to File Sur-Reply To Defendant's Motion To Dismiss, p8). Again, in their initial motion to dismiss, Defendant, through their attorney, did not dispute that admissions officials (at either university) saw Defendant's libelous content.

Finally, in their Reply Re: Plaintiff's Opposition to Defendant's Motion to Dismiss (pgs. 2-5), Defendant claimed that "Jurisdiction Over Defendant is Improper Just because Plaintiff Was In NV When She Read The Online Post." Plaintiff, however, never claimed that NV had jurisdiction based on her merely being present in the state, thus, this too was new information that Plaintiff asked for leave to reply to. (See Attached Sur-Reply to Plaintiff's Leave to File Sur-Reply to Defendant's Motion to Dismiss p. 7-9, Jurisdiction) Also, the conversation with Dr. Curcio-Nagy, is further evidence of a "local, on-the-ground response" sufficient to establish jurisdiction based on social media contact. (See Motion for Leave To File Sur-Reply To Defendant's Motion to Dismiss p.8 and Vangheluwe, 365 F. Supp. 3d at 880). Since Plaintiff had not spoken to Dr. Curcio-Nagy at the time of filing her original opposition to Defendant's Motion to Dismiss, this is an event that happened "**after the date of the pleading.**" Plaintiff was also waiting on Reddit's response, which she did not have at the time of her original opposition. (see p.3 of this brief) It should be noted, however, that Defendant has not once denied being behind the troll accounts harassing Plaintiff by impersonating UNLV faculty.

HEARING THIS MATTER, AS SCHEDULED, DOES INDEED PREJUDICE PLAINTIFF

In 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, they, through their attorney, state that "Plaintiff does not demonstrate how the Plaintiff would be prejudiced by the denial of the continuance." As demonstrated above, Plaintiff would be prejudiced by the denial because Defendant's reply presented information and arguments that Plaintiff had not previously had the chance to contest. This includes claims that she was unsure that she was suing the right person, that she was unsure that UNR (and UNLV) officials saw/knew about the libelous content, that she had not attempted to state that her allegations meet the elements for defamation, and that she was arguing for NV to have jurisdiction over this matter only because she was in NV when she read the defamatory content about herself. (See above section).

Defendant also asserts that Plaintiff "did not state any case law, statutory law or any other basis to seek such a continuance." According to NV R. Prac. Eight Judi. District, however, "A party may file an ex parte motion to continue a hearing, explaining why it could not be obtained by

stipulation.” *Rule 5.515 - Stipulations and motions to continue or vacate a hearing*, Nev. R. Prac. Eighth. Judi. Dist. Ct. 5.515 Plaintiff did, in her ex parte motion to continue hearing, explain why it could not not be obtained by stipulation. (See Ex Parte motion p.1)

Once again, it would prejudice Plaintiff to have the motion for dismissal heard before the motion to file her sur-reply since, as explained in this reply, its purpose was to counter new information that Defendant presented in his reply to her opposition to their motion to dismiss.

OBJECTION TO GRANTING ATTORNEYS' FEES TO DEFENDANT

Defendant's request for Plaintiff to pay his attorneys fees was an attempt to harass her. Here is a perfect example of his intention to inflict emotional distress on Plaintiff; he made that threat knowing about Plaintiff's anxiety disorder and heart murmur (see exhibit 36/Plaintiff's medical records).

First of all, as Defendant's attorney should know, one cannot simply request, in a reply, for an opponent to be sanctioned. Nor can one make a general request for all future filings by an opposing party to be stricken with prejudice. According to NV Rules of Civil procedure, Rule 11b (2): “A motion for sanctions must be separately filed from any motion and must describe the specific conduct that allegedly violates rule 11(b)” Similarly, the court may act on a motion to strike “made by a party either before responding to the pleading or, if a response is not allowed, within 21 day after being served with the pleading.” (NV Rules of Civil Procedure 12(f)(2)) Motions to strike, however, are requests that a judge strike *part* of a pleading—not blanket, preemptive requests to strike all subsequent filings from an opposing party. Also, Defendant, through their attorney, did not even bother filing the appropriate motions for requests they were seeking, nor did they attempt to demonstrate that Plaintiff's motion for leave to file her sur-reply and ex parte motion for continuance were frivolous . This confirms that these “requests” were nothing more than attempts to inflict further emotional distress on Plaintiff.

All they argued was that she was “attempting to have another bite at the apple” and that her ex parte motion for continuance was not based on any law. However, *Simonian vs. U. and Community College Systems of NV*, the case cited by Defendant's attorney, states “Under Nevada Law, a claim is frivolous if is not well-grounded in fact and *warranted* either by existing law or by *good faith argument* for the extension, modification, or reversal of existing law.” (See Opposition Re: Surreply and Continuance). Plaintiff's motions and claims were warranted by existing law (which she clarified in this reply), and she made good faith arguments as to why her sur-reply was necessary and why the Jan. 4th hearing on Defendant's Motion to Dismiss should be continued.

Essentially, Defendant, through their attorney, provided new information/arguments in his reply to Plaintiff's Opposition to their Motion to Dismiss, and now wants Plaintiff to pay his attorney fees just for responding. Moreover, although new issues were raised and new arguments presented, Defendant does not deny making false statements in their reply (or throughout the case) or mischaracterizing Plaintiff's argument.

Defendant, through their attorney, is also claiming that Plaintiff should have known that “her frivolous motion filings will result in attorneys’ fees and costs to be incurred by Defendant.” (See Opposition to Sur-Reply p.6) Again, as stated in the introduction to this opposition, these costs are something they should have considered before posting their libelous SRD post and harassing Plaintiff—to the point of disrupting her life and causing her to experience physical symptoms of stress. They also voluntarily accepted their attorney’s rate of service in exchange for his representation; if Defendant will not pay those fees, that is an issue between them and their attorney. Plaintiff is not responsible for paying those bills.

Based on Defendant’s **failure to file a responsive pleading to Plaintiff’s complaint**, their attempt to preemptively have all Plaintiff’s filings struck, their failure to even file the appropriate motions for their own requests, and their request for Plaintiff to pay their attorneys fees, it is evident that they through their attorney, are abusing court process to harass Plaintiff and avoid paying their own attorney fees.

CONCLUSION

Defendant, through their attorney, raised new issues and arguments in their reply to Plaintiff’s Opposition to their Motion to Dismiss. First, after acknowledging that Defendant was the same Peter Cooper who libeled and harassed Plaintiff, they, in their reply to her Opposition to their Motion to Dismiss, accused her of being uncertain whether she was suing the right person. Thus, Plaintiff provided exhibits (see exhibits 21-28) and rebutted this claim in her sur-reply, which she attached to her motion for leave to file it.

Next, they changed their reasoning for seeking dismissal. They first claimed that “Plaintiff’s posts and communications with UNLV” were the basis for seeking dismissal for failure to state a claim, and then afterwards claimed that the reason was that Plaintiff had “not even attempted to show that her allegations have the required elements for a defamation claim.” Thus, she had to address this new basis for dismissal in her sur-reply. She had also been waiting on a statement from UNLV police services saying that they do not have any records on her. Since Defendant is accusing her of stalking her professor in the most literal sense of the word (as defined by NRS 200.575), this exhibit is crucial in supporting her defamation claim. Plaintiff also experienced medical symptoms which further delayed her filing her exhibits and intended supplemental memorandum, and just as she was going to file them, Defendant filed their reply to her Opposition to their Motion to Dismiss. Thus, Plaintiff was not “attempting to re-argue her positions” but combining the information from the intended supplemental memorandum and sur-reply into one brief. It is ironic that Defendant would make such an accusation when they were supposedly worried about Plaintiff filing excessive motions.

They also claimed, for the first time, that Plaintiff was unsure whether UNR (and UNLV) admissions officials saw Defendant’s libelous SRD post. Thus, a sur-reply was necessary to address that new issue.

Additionally, Defendant claimed that Plaintiff's argument for jurisdiction was that she was merely present in NV when she read Defendant's libelous content about herself. They even compared it to suing a Defendant in a Swiss Court just because one was vacationing in Switzerland when they read such libelous content. Plaintiff, however, never made such an argument and did not want to let Defendant, through their attorney, twist her words to make it appear that this was indeed her argument. Had they addressed her actual arguments and not tried to make it sound like she was making a different argument than she had, then it would be unnecessary to include this issue in her sur-reply. Again, however, Plaintiff never based her jurisdiction argument on merely being present in NV but explained how the effects test established by *Caulder vs. Jones* would give NV jurisdiction. (See Plaintiff's Opposition to Defendant's Motion To Dismiss p3) She also showed how Defendant deliberately targeted NV both by the content of their libelous posts (allowing the public to believe that UNLV allowed a faculty member to be stalked) and by his harassment of her.

Plaintiff, at the time of her opposition, was also awaiting a response from Reddit regarding records she had requested from them. These records include the basic subscriber information to troll accounts impersonating UNLV faculty. Crucially, Defendant has not denied being behind these accounts, though Plaintiff wanted definitive proof that they were. This would not only help her emotional distress claim but would further show that Defendant targeted the state of NV by 1) harassing Plaintiff using the names of UNLV faculty (Dr. Marcia Gallo and Fawn Douglas, an Art Professor at UNLV at the time) and 2) by further highlighting that the alleged events in his libelous story took place at UNLV (where they allegedly allowed a professor to be stalked by a former student).

The standard for filing a sur-pley 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 v. Rumsfeld*, 154 F. As demonstrated in this reply, Defendant, in their reply Re: Plaintiff's Opposition to Defendant's Motion To Dismiss, introduced new matters that Plaintiff was unable to previously contest. Most outrageously, however, when Plaintiff attempted to contest these new matters, they requested that she pay their attorneys' fees! Moreover, they didn't even bother to file a motion for this request. Instead, they tried to make one summary "request" to have all Plaintiff's filings "disregarded and stricken with prejudice" and to have Plaintiff sanctioned just for asking for leave to respond to these matters—that they themselves introduced in their Reply to Plaintiff's Opposition to Defendant's Motion to Dismiss.

Finally, since the hearing on Plaintiff's sur-reply falls after the hearing on Defendant's motion to dismiss, and since it would, for the reasons stated above, prejudice her for the Court to hear the motion to Dismiss before seeing/deciding whether to Grant the sur-reply, her ex parte motion for continuance should be granted.

Plaintiff hereby asks this honorable court to DENY DEFENDANT'S MOTION TO DISMISS, DENY THEIR "REQUEST" FOR PLAINTIFF'S MOTIONS AND FILINGS TO BE DISREGARDED AND STRICKEN WITH PREJUDICE, DENY THEIR "REQUEST" FOR PLAINTIFF TO PAY (ANY OF) THEIR

ATTORNEY FEES, AND GRANT PLAINTIFF'S LEAVE TO FILE HER SUR-REPLY AND CONTINUE THE JAN. 4th HEARING.

Dated this 23rd of December, 2021

/s/Lisa Breslaw

Lisa Breslaw

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Plaintiff, In Proper Person

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2021, I served a true and correct copy of the foregoing:

**REPLY RE: OPPOSITION TO MOTION FOR LEAVE TO FILE SUR-REPLY TO DEFENDANT'S
MOTION TO DISMISS AND REPLY TO OPPOSITION TO EX PARTE MOTION FOR CONTINUANCE.**

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:

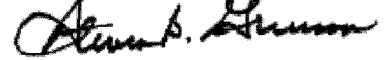
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Attorney for Defendant, Peter Cooper

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12/24/2021 12:10 AM
Steven D. Grierson
CLERK OF THE COURT

ERRATA TO 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

1. "...if she reapplied in 2022" (not 2020) p5

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DISTRICT COURT
CLARK COUNTY NV

Lisa Breslaw

Case No. A-21-837948-C

Plaintiff

Dept. 3

vs.

Peter Cooper

Defendant

**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**

Plaintiff LISA BRESLAW ("Breslaw" or "Plaintiff"), hereby files this reply to Defendant, Peter Cooper's ("Cooper" or "Defendant") Opposition to Plaintiff's Motion for Leave to File Sur-Reply to Defendant's Motion to Dismiss and their Opposition to Plaintiff's Ex Parte Motion for Continuance. This opposition is made and based upon the pleadings and papers on file, the attached memorandum and points of authorities, and any oral arguments that the Court may entertain at the time of the hearing on this matter.

Dated this 24th of December, 2021

/s/Lisa Breslaw

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INTRODUCTION

In their opposition to Plaintiff's Leave to File Sur-Reply and Ex Parte Motion for Continuance, and throughout this lawsuit in general, Defendant, now through their attorney, Saigar Raich, Esq. of Raich Law PLLC, is exhibiting the same abusive and harassing behavior that led to this suit in the first place. They are making false statements, taking Plaintiff's words out of context, and are now abusing the court process in an attempt to prevent Plaintiff from presenting her arguments and case to this Court. For example, they preemptively requested that "ANY FILINGS SUBMITTED BY PLAINTIFF AFTER THE SUBMISSION OF THIS REPLY TO BE STRICKEN WITH PREJUDICE." (See Reply Re: Defendant's Motion to Dismiss, p9).

First, as Defendant's attorney acknowledged, "Once a party files a motion, the adverse party may file an opposition, after which the movant may file a reply brief. See EDCR 2.20" Thus, since they filed this opposition to my motion to file a sur-reply and ex parte motion for continuance, I have the right to file this reply.

Plaintiff reserves the right, here and throughout the case, to present and support her arguments and claims to the best of her ability, and to fully pursue this lawsuit, as is allowed by law/civil procedure. And that includes the right, when necessary, to file supplemental pleadings, sur-replies or additional motions, etc. If Defendant is worried about the costs of attorneys' fees or litigation, they should have thought about that before posting their libelous story re: Plaintiff (and UNLV) on Subredditdrama and then harassing her (and inciting others to do the same) for an extended time period—despite knowing that she suffered from an anxiety disorder.

In the following memorandum and points of authority, Plaintiff will address the issues Defendant has raised in their latest oppositions (to Plaintiff's leave to file sur-reply and ex parte motion for continuance) and further show this Court why the sur-reply and continuance of the Jan. 4th 2022 hearing (on Defendant's Motion to Dismiss) are necessary.

MEMORANDUM AND POINTS OF AUTHORITY

SUR-REPLY TO REARGUE AN OPPOSITION IS IMPROPER (PLAINTIFF'S REBUTTAL)

In 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, they, through their attorney, claim that Plaintiff, in moving to file her sur-reply, is "attempting to have another bite at the apple" and increase litigation costs for Defendant. (See Opposition to Motion For Leave To File Sur Reply and Opposition to Ex Parte Motion for Continuance p. 1-5)

However, that is not the case. In their reply Re: Defendant's Motion to Dismiss, Defendant, through their attorney, presented new information that was not included in their original motion.

For example, In their motion to dismiss, Defendant's attorney never claimed that Plaintiff was unsure of Defendant's identity. In fact, at multiple points, he clearly acknowledged that

Defendant made the libelous post which Plaintiff is suing over. For example, at one point he stated "Even assuming Plaintiff's allegations as true, Defendant's post concerned issues of a public institution (UNLV)..." (Defendant's Motion to Dismiss, p 11). That is just one example, but throughout the brief, there was no dispute over Defendant's identity. However, in their reply to Plaintiff's opposition to their motion to dismiss they raised this new issue of Defendant's identity (claiming that Plaintiff only *suspected* Defendant to be the one who libeled and harassed her on Reddit). Essentially, they claimed (for the first time) that Plaintiff was not even sure if she was suing the right person. Therefore, Plaintiff felt obligated to respond and present ample evidence that Defendant is indeed the same Peter Cooper that libeled and harassed her on Reddit. (See exhibits 21-28 and Motion for Leave to File Sur-Reply to Defendant's Motion To Dismiss p.5-6). Had Plaintiff not moved the court to file a sur-reply, and if this Court hears Defendant's motion to dismiss without seeing this evidence, it prejudices Plaintiff because, one, a Court is certainly more likely to dismiss a case if a Plaintiff is not even sure that they're suing the right person. (Defendant, again, was trying to make it appear that Plaintiff was unsure of Defendant's identity.)

In Plaintiff's original opposition, she also said that she was waiting on Reddit to provide the basic subscriber information of certain troll accounts—accounts impersonating UNLV faculty—that she suspects to be Defendant. (Again, the term *suspects* referred to these troll accounts; there was never any uncertainty regarding Defendant's identity or that they libeled and harassed her from their main accounts). At the time of filing her original Opposition to Defendant's Motion to Dismiss, she anticipated having this information before the January 4th hearing. (See Opposition to Defendant's Motion to Dismiss, p2 and exhibit 16). Then, when Defendant, through their attorney, filed their reply: re: Defendant's Motion To Dismiss, Plaintiff still had not received these records from Reddit. Therefore, she wanted to demonstrate to this honorable Court that she was making a good faith effort to obtain these records, as it is crucial in further supporting her claim of intentional infliction of emotional distress and demonstrating why NV jurisdiction is indeed proper. After all, if Defendant was behind these troll accounts harassing Plaintiff under UNLV faculty names, that is certainly behavior targeted against NV (and intending to inflict emotional distress against Plaintiff). Since, however, Defendant filed their reply before she had these records, she needed to include exhibit 22 in her sur-reply to show that she was working on getting this information. (See exhibit 22 and Motion to File Sur-Reply to Defendant's Motion to Dismiss).

Reddit has since responded and said that they are awaiting the outcome of the motion to dismiss before further action will be taken with respect to the subpoena." (See Exhibit 37) This implies that they will provide the requested information if the case is not dismissed. Since this information was not available at the time of Plaintiff's Opposition to Defendant's Motion to Dismiss, it complies with NRCP 15 (d). "On motion and reasonable notice the court may on just terms, permit a party to serve as supplemental pleading setting out any transaction, occurrence, **or event that happened after the date of the pleading** to be supplemented." (See Defendant's Opposition Re: Surreply and Ex Parte Motion, p2)

As stated in Plaintiff's Motion to File a Sur-Reply, part of the reason for her intended supplemental memorandum/pleading was because she had to wait on UNLV's police services to search their records, and then she had to wait until the records clerk returned from an extended holiday vacation before receiving their statement (that they have no records on her). This too is in compliance with NRCP 15(d) (see above paragraph). As stated in her Motion For Leave To File Sur-Reply To Defendant's Motion To Dismiss, she was also incapacitated by certain medical symptoms which further delayed her filing the supplemental memorandum (see exhibit 21). Before she could file the supplemental memorandum, however, Defendant filed their Reply to her Opposition (re: the motion to dismiss) and presented the new issues (listed above and more of which will be discussed in this brief). Thus, since she never had the chance to file the supplemental memorandum, Plaintiff combined the information she would have included in it with her sur-reply. This is not, as Defendant, through their attorney claims ``attempting to have another bite at the apple.``

Furthermore, here is another example of Defendant's false and misleading statements. In their Opposition re: Surreply and Continuance, they, through their attorney claimed that "the only 'new evidence' Plaintiff attempts to include is her 'original abstract and proposal,' which unfortunately has nothing to do with the motion to dismiss and the grounds therein..." (See Opposition re: Surreply and Continuance, p4). First, this is clearly not the only new evidence Plaintiff provided; she also provided a statement by UNLV police services showing that they did not have records on her (see exhibit 30 and above paragraph). In Defendant's Reply Re: Defendant's Motion to Dismiss, they claim that "...the opposition does not even attempt to state that Plaintiff's allegations have met the elements of defamation as required in Nevada." (See Reply RE: Motion to Dismiss p.5). This raised a new issue, since they initially claimed that "Plaintiff's posts and communications with UNLV were their basis for Defendant to seek dismissal for failure to state a claim (see Motion to Dismiss p. 7)."

However, by stating in their Reply Re: Defendant's motion to dismiss that Plaintiff does not even attempt to state that her allegations have met the elements of defamation as required in NV, Defendant was stating a new basis for their dismissal-- that Plaintiff's allegations instead did not meet Nevada's required elements of Defamation. As Defendant pointed out, the first required general element of a defamation claim in NV is "a false and defamatory statement by [a] defendant concerning the Plaintiff..." *Pegasus v. Reno Newspapers Inc.*, 118 Nev. 706, 718, 57 P. 3d 82, 90 (2002). Defendant's main and most egregious/damaging allegation against Plaintiff was that she stalked her former professor, Dr. Marcia Gallo, who was still teaching at UNLV during the period that Defendant claimed Plaintiff engaged in this alleged "stalking." Thus, the surest way for Plaintiff to demonstrate that this allegation is false and defamatory was to obtain a statement from UNLV's police services showing that they had no records on her--and she had to wait for these records, plus there was a delay due her medical symptoms (see exhibits 30 and 21).

Also, Defendant has not even attempted to argue that they used the term "stalking" hyperbolically, plus they clearly presented their story as statements of fact and made specific and demonstrably false claims (i.e. that Plaintiff kept bombarding Dr. Gallo with messages).

Thus, Plaintiff not only needed the opportunity to prove these claims were false (hence exhibit 30), but to prevent Defendant from changing course and arguing that they used the term stalking hyperbolically (after citing NRS 200.575) Plaintiff needed to point out the specific false statements of facts (i.e. bombarding Dr. Gallo with messages etc.) and demonstrate the other 3 elements of defamation. (See Motion for Leave to File Sur-Reply To Defendant's Motion To Dismiss, p. 9-13, Claims For Relief For Defamation) Again, in their Reply Re: Defendant's Motion to Dismiss, Defendant stated a different basis for dismiss for "failure to state a claim."

Getting back to the proposal abstract, despite Defendant's assertion that it has "nothing to do with the motion to dismiss," since Defendant is now claiming that Plaintiff has "not even attempted to meet the elements of defamation," Plaintiff has the right to counter that assertion. Again, defamation is fundamentally based on the falsity of a Defendant's statements/allegations. Thus, in order to even begin to meet the elements of defamation, first and foremost, a Plaintiff must show that the allegations in question are false. In addition to alleging that Plaintiff stalked (as defined by NRS 200. 575) Dr. Marcia Gallo, her former UNLV history professor, Defendant also alleged that this stalking ultimately stemmed from Plaintiff's failure to coerce Dr. Gallo to assist with her oral history project. Specifically, they claimed that Plaintiff told her [Dr. Gallo] that "they would collaborate on it [the project]." Even this allegation alone could and did damage Plaintiff's reputation and grad school prospects, as it makes her seem demanding and difficult to work with (at the very least...not to mention the "stalking" allegation). Thus, by adding exhibit 33, Plaintiff leaves no room for doubt that that allegation is entirely false.

Next, in their Reply Re: Defendant's Motion to Dismiss, Defendant claimed that Plaintiff "does not even know that admissions officials at UNLV and UNR saw her posts." In their initial Motion to dismiss, however, they never challenged Plaintiff's claim that UNR officials saw Plaintiff's posts. Also, Plaintiff, at the time of her Opposition to Defendant's Motion To Dismiss, had not yet had the previously mentioned conversation with Dr. Linda Curcio-Nagy, History Professor and Assistant Dean of UNR's Liberal Arts College. (See Plaintiffs Leave to File Sur-Reply to Defendant's Motion to Dismiss p.8) Furthermore, in Plaintiff's initial email to Dr. Emily Hobson, her preferred graduate advisor at UNR, when she mentioned that Dr. Gallo inspired her into her intended field (History of Sexuality/20th Century History), Dr. Hobson replied "I absolutely understand your admiration for Dr. Gallo." (This email is on Plaintiff's old student account, which is now closed.) Thus, Plaintiff believes this alludes to Dr. Hobson seeing the libelous SRD post. Afterwards, Dr. Hobson stopped communicating with Plaintiff. However, after Plaintiff mentioned the situation (Dr. Hobson not speaking to Plaintiff) to Dr. Curcio-Nagy, she subsequently received a reply from Dr. Hobson (to a follow-up email)--declining to advise her if she reapplied in 2022.

Also, in their Reply Re: Plaintiff's Opposition to Defendant's Motion to Dismiss, Defendant additionally argued that Plaintiff did not know whether *UNLV* admissions officials saw Defendant's libelous post, but Plaintiff was claiming special damages based on her rejection

from UNR. Thus, here was another example of Defendant's fabrications, though it still presented new information that Plaintiff had not previously had the chance to address. Plaintiff was also worried that Defendant, given their history of fabrication and twisting her words, was going to claim that Plaintiff was unsure whether any official at UNLV saw Defendant's SRD post. Again, Debra Pierushka, UNLV's Assistant General Counsel explicitly told Plaintiff that she had seen the libelous SRD post (and, in turn, Plaintiff's "social media activity" [see Complaint, paragraph 33]) and that this post was the reason for this cease and desist letter. (See Motion for Leave to File Sur-Reply To Defendant's Motion To Dismiss, p8). Again, in their initial motion to dismiss, Defendant, through their attorney, did not dispute that admissions officials (at either university) saw Defendant's libelous content.

Finally, in their Reply Re: Plaintiff's Opposition to Defendant's Motion to Dismiss (pgs. 2-5), Defendant claimed that "Jurisdiction Over Defendant is Improper Just because Plaintiff Was In NV When She Read The Online Post." Plaintiff, however, never claimed that NV had jurisdiction based on her merely being present in the state, thus, this too was new information that Plaintiff asked for leave to reply to. (See Attached Sur-Reply to Plaintiff's Leave to File Sur-Reply to Defendant's Motion to Dismiss p. 7-9, Jurisdiction) Also, the conversation with Dr. Curcio-Nagy, is further evidence of a "local, on-the-ground response" sufficient to establish jurisdiction based on social media contact. (See Motion for Leave To File Sur-Reply To Defendant's Motion to Dismiss p.8 and Vangheluwe, 365 F. Supp. 3d at 880). Since Plaintiff had not spoken to Dr. Curcio-Nagy at the time of filing her original opposition to Defendant's Motion to Dismiss, this is an event that happened "**after the date of the pleading.**" Plaintiff was also waiting on Reddit's response, which she did not have at the time of her original opposition. (see p.3 of this brief) It should be noted, however, that Defendant has not once denied being behind the troll accounts harassing Plaintiff by impersonating UNLV faculty.

HEARING THIS MATTER, AS SCHEDULED, DOES INDEED PREJUDICE PLAINTIFF

In 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, they, through their attorney, state that "Plaintiff does not demonstrate how the Plaintiff would be prejudiced by the denial of the continuance." As demonstrated above, Plaintiff would be prejudiced by the denial because Defendant's reply presented information and arguments that Plaintiff had not previously had the chance to contest. This includes claims that she was unsure that she was suing the right person, that she was unsure that UNR (and UNLV) officials saw/knew about the libelous content, that she had not attempted to state that her allegations meet the elements for defamation, and that she was arguing for NV to have jurisdiction over this matter only because she was in NV when she read the defamatory content about herself. (See above section).

Defendant also asserts that Plaintiff "did not state any case law, statutory law or any other basis to seek such a continuance." According to NV R. Prac. Eight Judi. District, however, "A party may file an ex parte motion to continue a hearing, explaining why it could not be obtained by

stipulation.” *Rule 5.515 - Stipulations and motions to continue or vacate a hearing*, Nev. R. Prac. Eighth. Judi. Dist. Ct. 5.515 Plaintiff did, in her ex parte motion to continue hearing, explain why it could not not be obtained by stipulation. (See Ex Parte motion p.1)

Once again, it would prejudice Plaintiff to have the motion for dismissal heard before the motion to file her sur-reply since, as explained in this reply, its purpose was to counter new information that Defendant presented in his reply to her opposition to their motion to dismiss.

OBJECTION TO GRANTING ATTORNEYS' FEES TO DEFENDANT

Defendant's request for Plaintiff to pay his attorneys fees was an attempt to harass her. Here is a perfect example of his intention to inflict emotional distress on Plaintiff; he made that threat knowing about Plaintiff's anxiety disorder and heart murmur (see exhibit 36/Plaintiff's medical records).

First of all, as Defendant's attorney should know, one cannot simply request, in a reply, for the opposition to be sanctioned. Nor can one make a general request for all future filings by an opposing party to be stricken with prejudice. According to NV Rules of Civil procedure, Rule 11b (2): “A motion for sanctions must be separately filed from any motion and must describe the specific conduct that allegedly violates rule 11(b)” Similarly, the court may act on a motion to strike “made by a party either before responding to the pleading or, if a response is not allowed, within 21 day after being served with the pleading.” (NV Rules of Civil Procedure 12(f)(2)) Motions to strike, however, are requests that a judge strike *part* of a pleading—not blanket, preemptive requests to strike all subsequent filings from an opposing party. Also, Defendant, through their attorney, did not even bother filing the appropriate motions for requests they were seeking, nor did they attempt to demonstrate that Plaintiff's motion for leave to file her sur-reply and ex parte motion for continuance were frivolous . This confirms that these “requests” were nothing more than attempts to inflict further emotional distress on Plaintiff.

All they argued was that she was “attempting to have another bite at the apple” and that her ex parte motion for continuance was not based on any law. However, *Simonian vs. U. and Community College Systems of NV*, the case cited by Defendant's attorney, states “Under Nevada Law, a claim is frivolous if is not well-grounded in fact and *warranted* either by existing law or by *good faith argument* for the extension, modification, or reversal of existing law.” (See Opposition Re: Surreply and Continuance). Plaintiff's motions and claims were warranted by existing law (which she clarified in this reply), and she made good faith arguments as to why her sur-reply was necessary and why the Jan. 4th hearing on Defendant's Motion to Dismiss should be continued.

Essentially, Defendant, through their attorney, provided new information/arguments in his reply to Plaintiff's Opposition to their Motion to Dismiss, and now wants Plaintiff to pay his attorney fees just for responding. Moreover, although new issues were raised and new arguments presented, Defendant does not deny making false statements in their reply (or throughout the case) or mischaracterizing Plaintiff's argument.

Defendant, through their attorney, is also claiming that Plaintiff should have known that “her frivolous motion filings will result in attorneys’ fees and costs to be incurred by Defendant.” (See Opposition to Sur-Reply p.6) Again, as stated in the introduction to this opposition, these costs are something they should have considered before posting their libelous SRD post and harassing Plaintiff—to the point of disrupting her life and causing her to experience physical symptoms of stress. They also voluntarily accepted their attorney’s rate of service in exchange for his representation; if Defendant will not pay those fees, that is an issue between them and their attorney. Plaintiff is not responsible for paying those bills.

Based on Defendant’s **failure to file a responsive pleading to Plaintiff’s complaint**, their attempt to preemptively have all Plaintiff’s filings struck, their failure to even file the appropriate motions for their own requests, and their request for Plaintiff to pay their attorneys fees, it is evident that they through their attorney, are abusing court process to harass Plaintiff and avoid paying their own attorney fees.

CONCLUSION

Defendant, through their attorney, raised new issues and arguments in their reply to Plaintiff’s Opposition to their Motion to Dismiss. First, after acknowledging that Defendant was the same Peter Cooper who libeled and harassed Plaintiff, they, in their reply to her Opposition to their Motion to Dismiss, accused her of being uncertain whether she was suing the right person. Thus, Plaintiff provided exhibits (see exhibits 21-28) and rebutted this claim in her sur-reply, which she attached to her motion for leave to file it.

Next, they changed their reasoning for seeking dismissal. They first claimed that “Plaintiff’s posts and communications with UNLV” were the basis for seeking dismissal for failure to state a claim, and then afterwards claimed that the reason was that Plaintiff had “not even attempted to show that her allegations have the required elements for a defamation claim.” Thus, she had to address this new basis for dismissal in her sur-reply. She had also been waiting on a statement from UNLV police services saying that they do not have any records on her. Since Defendant is accusing her of stalking her professor in the most literal sense of the word (as defined by NRS 200.575), this exhibit is crucial in supporting her defamation claim. Plaintiff also experienced medical symptoms which further delayed her filing her exhibits and intended supplemental memorandum, and just as she was going to file them, Defendant filed their reply to her Opposition to their Motion to Dismiss. Thus, Plaintiff was not “attempting to re-argue her positions” but combining the information from the intended supplemental memorandum and sur-reply into one brief. It is ironic that Defendant would make such an accusation when they were supposedly worried about Plaintiff filing excessive motions.

They also claimed, for the first time, that Plaintiff was unsure whether UNR (and UNLV) admissions officials saw Defendant’s libelous SRD post. Thus, a sur-reply was necessary to address that new issue.

Additionally, Defendant claimed that Plaintiff's argument for jurisdiction was that she was merely present in NV when she read Defendant's libelous content about herself. They even compared it to suing a Defendant in a Swiss Court just because one was vacationing in Switzerland when they read such libelous content. Plaintiff, however, never made such an argument and did not want to let Defendant, through their attorney, twist her words to make it appear that this was indeed her argument. Had they addressed her actual arguments and not tried to make it sound like she was making a different argument than she had, then it would be unnecessary to include this issue in her sur-reply. Again, however, Plaintiff never based her jurisdiction argument on merely being present in NV but explained how the effects test established by *Caulder vs. Jones* would give NV jurisdiction. (See Plaintiff's Opposition to Defendant's Motion To Dismiss p3) She also showed how Defendant deliberately targeted NV both by the content of their libelous posts (allowing the public to believe that UNLV allowed a faculty member to be stalked) and by his harassment of her.

Plaintiff, at the time of her opposition, was also awaiting a response from Reddit regarding records she had requested from them. These records include the basic subscriber information to troll accounts impersonating UNLV faculty. Crucially, Defendant has not denied being behind these accounts, though Plaintiff wanted definitive proof that they were. This would not only help her emotional distress claim but would further show that Defendant targeted the state of NV by 1) harassing Plaintiff using the names of UNLV faculty (Dr. Marcia Gallo and Fawn Douglas, an Art Professor at UNLV at the time) and 2) by further highlighting that the alleged events in his libelous story took place at UNLV (where they allegedly allowed a professor to be stalked by a former student).

The standard for filing a sur-pley 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 v. Rumsfeld*, 154 F. As demonstrated in this reply, Defendant, in their reply Re: Plaintiff's Opposition to Defendant's Motion To Dismiss, introduced new matters that Plaintiff was unable to previously contest. Most outrageously, however, when Plaintiff attempted to contest these new matters, they requested that she pay their attorneys' fees! Moreover, they didn't even bother to file a motion for this request. Instead, they tried to make one summary "request" to have all Plaintiff's filings "disregarded and stricken with prejudice" and to have Plaintiff sanctioned just for asking for leave to respond to these matters—that they themselves introduced in their Reply to Plaintiff's Opposition to Defendant's Motion to Dismiss.

Finally, since the hearing on Plaintiff's sur-reply falls after the hearing on Defendant's motion to dismiss, and since it would, for the reasons stated above, prejudice her for the Court to hear the motion to Dismiss before seeing/deciding whether to Grant the sur-reply, her ex parte motion for continuance should be granted.

Plaintiff hereby asks this honorable court to DENY DEFENDANT'S MOTION TO DISMISS, DENY THEIR "REQUEST" FOR PLAINTIFF'S MOTIONS AND FILINGS TO BE DISREGARDED AND STRICKEN WITH PREJUDICE, DENY THEIR "REQUEST" FOR PLAINTIFF TO PAY (ANY OF) THEIR

ATTORNEY FEES, AND GRANT PLAINTIFF'S LEAVE TO FILE HER SUR-REPLY AND CONTINUE THE JAN. 4th HEARING.

Dated this 24th of December, 2021

/s/Lisa Breslaw

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Plaintiff, In Proper Person

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2021, I served a true and correct copy of the foregoing:

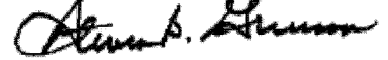
**REPLY RE: OPPOSITION TO MOTION FOR LEAVE TO FILE SUR-REPLY TO DEFENDANT'S
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through the electronic filing system of the Eighth Judicial District Court of the State of Nevada,
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Plaintiff, in Proper Person

**EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY**

Lisa Breslaw
Plaintiff

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

vs.

**MOTION FOR LEAVE
TO AMEND COMPLAINT**

Peter Cooper
Defendant

Plaintiff LISA BRESLAW ("BRESLAW" or "PLAINTIFF") hereby files the Motion for Leave to file her attached Amended Complaint. This motion is made and based upon the pleadings and papers on file, the attached memorandum and points of authorities, and any oral argument that the court may entertain at the time of hearing on this matter.

Dated this 27th of December, 2021

/s/ Lisa Breslaw
Lisa Breslaw
7050 Shady Palms Street
Las Vegas, NV 89131
702-488-6989
lisa.breslaw@alumni.unlv.edu
Plaintiff, in Proper Person

MEMORANDUM AND POINTS OF AUTHORITIES

INTRODUCTION:

Plaintiff filed her original complaint against Defendant, Peter Cooper, on July, 15th, 2021 and a conforming summons was issued on 7/20/2021. At that time, Plaintiff did not know Defendant's location, and on 9/30/21, her motion for alternative service was denied on the grounds that, at that time, the attached exhibits were "insufficient to establish that Defendant is associated with the alleged social media accounts." (See Court Minutes on file, 9/30/21) Plaintiff then spent months hiring multiple private investigators and a local process server, Genice Rojas, in an attempt to locate and serve Defendant. Several attempts were made by these investigators to contact Defendant over social media, but Defendant refused to respond to them. After considerable effort and expense to Plaintiff, Defendant was finally located at the University of Colorado, Boulder. Plaintiff then hired Colorado Investigator Jan Payne, who told Plaintiff that she had found Defendant's address. However, there was still the obstacle of serving Defendant in a secure building. Plaintiff nonetheless had paid for a service attempt on campus-set for a few days later. Before that attempt could be made, however, Plaintiff was informed by Genice Rojas that Defendant had accepted service through his attorney, Sagar Raich. On October 27, 2021, Defendant was served. Plaintiff cancelled the campus service attempt and was given a partial refund.

On November, 2, 2021, Defendant, through their attorney, Sagar Raich, Esq., filed a motion to dismiss for "lack of personal jurisdiction," failure to state a claim," and "protected speech." However, **Defendant has still not filed a responsive pleading.** Therefore, Plaintiff wishes to amend the complaint to address these issues, add the claim of "Portrayal in a False Light," and add the court costs and costs of investigators/process servers to the relief she seeks.

MEMORANDUM OF POINTS OF AUTHORITIES

According to NRCP 15(a)(2), if not amended within 21 days of either a responsive pleading or service of motion 12 (b) (e) or (f), a party may "amend its pleading only with the opposing party's written consent or the court's leave. **The court should freely give leave when justice so requires.**"

Also, "An amendment to a pleading relates back to the date of the original pleading when:(1) the amendment asserts a claim or defense that arose out of the conduct, transaction, or occurrence set out-or attempted to be set out- in the original pleading." (NRCP C[1])

Finally, the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery(FRCP C[3])

JUSTIFICATION

Justice is so required here because: 1) It is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation (FRCP 11[b].)

Plaintiff is amending her complaint to address deficiencies claimed by Defendant through their attorney. All the new facts and claims arose out of the “conduct, transaction, or occurrence set out-or attempted to be set out- in the original pleading.” The reason Plaintiff did not file this leave earlier is because she was worried that their attorney would not accept service of the amended complaint. Given the extraordinary difficulty she had serving them and the fact that they’re living on an enormous, secure college campus (where service would be difficult), she feared having to start the process over—and possibly not being able to serve them again. Even in their reply to her opposition to their motion to dismiss, their attorney (wrongly/falsely) alleged that “Plaintiff admits that she does not even know whether it was Defendant who caused her harm...” (See Reply Re: Defendant’s Motion to Dismiss p.2) Thus, her fears were not unfounded or unreasonable. However, in her motion to file her sur-reply, Plaintiff provided this Court with ample evidence (much more than she had at the time of her motion for alternative service) of Defendant’s identity and location (see exhibits 21-29). Thus, if their attorney refused to accept service of the amended complaint, Plaintiff believes she would still be able to serve them now.

Her request for Defendant to pay for her court costs and investigator /process service is also just since it was Defendant’s actions that caused this suit in the first place, plus their refusal to be served resulted in additional expenses for Plaintiff. Also, granting this motion would not prejudice Defendant.

PROPOSED AMENDMENTS

In her amended complaint, Plaintiff would like to first clarify how Defendant deliberately targeted the State of Nevada in their libelous post and harassment of Plaintiff. Again, although Defendant used the term “retired,” Dr. Gallo, as Plaintiff had stated in the posts Defendant linked in his libelous content, was teaching part-time at UNLV during the time they claimed Plaintiff “stalked” her. UNLV, however, still has a duty of care to part-time faculty members and employees, especially regarding their safety. Thus, by claiming that Plaintiff “stalked her retired professor,” Defendant had stated that UNLV allowed a faculty member, whom they had a duty of care to, to be stalked. Furthermore, Defendant knew, based on Plaintiff’s username and the troll accounts appearing with UNLV faculty members names in them, that the alleged events he was describing happened at UNLV. Plaintiff believes Defendant to have been behind some of these troll accounts, and she is awaiting records from Reddit for confirmation. Defendant was also explicitly told by the South Yorkshire Police, when they warned them to stop harassing Plaintiff, that she resided in Las Vegas.

Next, In her original complaint, Plaintiff said that “she was accused of the crime of stalking.” However, she would like to cite the specific defamatory statements Defendant made in their libelous post.

They were (in order of appearance).

“ 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.” (

“...so she applies a proposal for a conference, gets accepted, and *then* tells her professor about it and that they would collaborate on it.”

“...as OP already knew at that point, the professor was retiring after that semester.”

“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.” (Plaintiff never tried to have the Dean, Dr. Jennifer Keene, demoted.)

“She's convinced she can make up to her and be the professor's friend.” Plaintiff said that she would like to have stayed in touch with Dr. Gallo, but not that they would be close friends. She even acknowledged, in a post Defendant linked, that as much as she would have liked to have kept in touch, given their limited interactions etc., Dr. Gallo probably was not interested in having any personal relationship with her. In the context of Defendant's libelous post, that statement makes Plaintiff sound delusional and more like someone who would stalk a former professor. (see exhibit 18/limerence post)

“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.” (Plaintiff, again, was contacting UNLV administration to retract the grievance; she was not contacting Dr. Gallo directly. She also did not set out to ruin Dr. Gallo's career. Again, UNLV mishandled the matter by either not following their stated policy of trying to first have the parties resolve their issue or by lying to Plaintiff about the grievance's existence.”

Since Defendant took posts that Plaintiff had actually made [and deleted] and deliberately misconstrued/ created a false context for them (in a way that gave people a negative and inaccurate impression of her), she also wants to add the claim of portrayal in a false light.

Additionally, Defendant should have to pay Plaintiff's court costs and the costs of all the private investigators/process servers she hired. Had Defendant responded to the initial attempts to contact him and agreed to be served, Plaintiff would not have incurred those fees. Plaintiff could not have listed those fees in her initial complaint since she could not predict how much it would cost to find and serve Defendant.

CERTIFICATE OF SERVICE

I hereby certify that on December 26, 2021, I served a true and correct copy of the foregoing: MOTION FOR LEAVE TO AMEND COMPLAINT. 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
NEVADA BAR 13229
RAICH LAW PLLC 6785 S. Eastern Ave., Suite 5
Las Vegas, NV 89119
Attorney for Defendant, Peter Cooper

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

COURT

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

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

Lisa Breslaw
Plaintiff

Case No. A-21-87948-C
Department 3

vs.

Peter Cooper
Defendant

FIRST AMENDED 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 times herein. Defendant has a history of frequent moving, and not long after moving to Reading, was posting about moving back to the US. He first moved to Boston, where he stayed with his parents, and then moved two more times, according to his posts. He is now living on campus at the University of Colorado, Boulder.

II. FACTS

1. Defendant identified as male at the time of the relevant torts, then identified as nonbinary, and now, based on their Reddit activity, feels like they may be transgender. To Plaintiff's knowledge, however, their preferred pronouns are still "they" and "them," so Plaintiff will continue using these pronouns when referencing Defendant, unless she learns of a change in this preference.
2. Plaintiff graduated magna cum laude from the University of Nevada Las Vegas on December 15, 2018. She had a 3.93 cumulative GPA, 4.0 History gpa, and completed six graduate-level history classes. Prior to the facts stated below, she had no prior conflict with faculty nor any conduct issues.
3. Plaintiff has generalized anxiety disorder/obsessive compulsive disorder, is afraid of flying, and fears germs. These phobias have worsened during the pandemic, and traveling out of state/country to sue Defendant would be a significant hardship for Plaintiff. Her GAD/OCD diagnosis is medically documented (see exhibit 21).
4. Around February or March of 2019, Plaintiff submitted a proposal to the Oral History Association for presentation at their 2019 annual conference in Salt Lake City. On April 15, she was notified that her proposal was accepted. This was her first submission to an academic conference and would have simultaneously been the first one she attended.
5. In late April of 2019, 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. She did not, however, tell her that "they would collaborate on it," or in any way demand or imply that she would assist. (See exhibits 1 and 33, Plaintiff believes UNLV to have the original email.)
6. Dr. Gallo replied to this email, declining to assist, on the grounds that (in summary) Plaintiff lacked the proper background and experience in oral history to present a project at a conference. Plaintiff, however, perceived the tone of this reply as "curt." She then agreed to withdraw the proposal from the conference, and explained to Dr. Gallo that, in order to demonstrate her ability to handle a significant project, she would still like to complete it without presenting it at the conference. In this email, she said that "any assistance would be appreciated," but again, she did not "tell" Dr. Gallo that "they would collaborate on it." (See exhibit 3)
7. Prior to the "curt" response, Plaintiff believed herself to have a good rapport with Dr. Gallo. (See exhibit 2)
8. When Dr. Gallo did not reply to Plaintiff's subsequent email within 24 hours (as she normally did) Plaintiff emailed UNLV's History Department Chair, Dr. Andrew Kirk, regarding Dr. Gallo's "tone" on a few other occasions, the lack of response to the previous email, and expressed feeling anxious over Dr. Gallo's seeming change in attitude toward her. (UNLV has a

record of this email.) Plaintiff was not retaliating against Dr. Gallo for not assisting with her project but was concerned about this seeming change in attitude.

9. UNLV's policy regarding such situations stipulates that attempts should be made to resolve concerns at "the lowest possible level," ideally between the parties themselves, before a formal complaint is filed. (See exhibit 32) However, On May 16, 2019, Dr. Kirk emailed Plaintiff stating that he had "discussed the matter at length" with the Dean and Associate Dean of the Liberal Arts College (Drs. Jennifer Keene and John Tuman, respectively), "reported Plaintiff's "complaint" to Student Affairs, and told Plaintiff that "her grievances" were being "taken very seriously" and "formally recorded." (See exhibit 4)

10. Plaintiff then wanted to see these records to find out why Dr. Gallo had been upset with her. She first emailed Dean Keene, who denied there being any documentation of the grievance, but referred her to the Office of Registrar in case she wanted to examine her education records. She was eventually directed to the correct person within the Registrar's Office (Jennifer Drennen) and examined the requested records. These consisted of some email exchanges between Dr. Kirk and Dr. Gallo in which Dr. Gallo's stated reason for declining to assist with the project was consistent with what she had initially told Plaintiff (i.e. lack of oral history training and not having consulted with faculty before asking for assistance). Dr. Kirk had also requested a phone conversation with her, and while Plaintiff does not know what was said, Dr. Gallo replied (in the email)"I am stunned that she is accusing me of somehow causing harm." (Plaintiff had mentioned her anxiety being triggered but did not accuse Dr. Gallo of inflicting any other "harm.")

11. After seeing these records, Plaintiff wished to retract the grievance, and met with Dean Keene some time around June or July of 2019 in order to do so. Dean Keene, however, denied the meeting with Dr. Kirk and again denied the "grievance" (i.e. there being a record of Plaintiff's "complaint" against Dr. Gallo). She also told Plaintiff that she had spoken to Dr. Gallo about the situation and that Dr. Gallo was not angry or upset with her. She even told Plaintiff that she may contact her (Dr. Gallo) for a letter of recommendation for graduate school. (Dean Keene later denied this conversation as well.)

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

13. After Dean Keene's reassurances, Plaintiff emailed Dr. Gallo an apology letter around July 31, 2019, and included a request for a graduate school letter of recommendation. This act does not count as stalking or harassment under Nevada law.

14. Dr. Gallo did not reply to this email.

15. Dr. Gallo was teaching part-time at UNLV at this time due to being in the process of phase-in retirement. However, she was still considered an employee of UNLV, and they had a duty of care to her. She did not officially retire from UNLV until July of 2020.

16. When Dr. Gallo did not respond to Plaintiff's apology/reference letter request, Plaintiff began contacting various UNLV offices and administrators. These correspondences included the Disability Resource Center, Student Affairs, Human Resources, Dean Keene, Dr. Christopher Heavy (Vice Provost), Dr. Marta Meana (then acting President) and Assistant General Counsel, Debra Pieruschka. She was not, however, directly contacting Dr. Gallo.

17. In addition to wanting to retract the grievance against Dr. Gallo, she also wanted to file a complaint against Dr. Kirk for his negligence in handling the situation. (He either unnecessarily escalated the matter or lied to Plaintiff about the formal grievance.) Plaintiff, to her knowledge, did not specifically request that Dean Keene be demoted. She did, however, complain about the University to the Board of Regents over the matter.

18. After repeatedly being told by UNLV administration that "the matter was closed," Plaintiff began posting about the situation on Reddit (under the username Gemini725). Gemini is Plaintiff's Zodiac sign and 725 was used to indicate a Las Vegas area code.

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

20. On December 16, 2019 Defendant created a defamatory post on r/subredditdrama, a subreddit with nearly one million viewers, called *University Student Makes a dumb decision regarding her professor when applying to graduate 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," got the "Provost, Faculty Senate, and the Board of Regents involved in having both Dr. Kirk and Dean Keene demote, and then stalked Dr. Gallo. They specifically alleged that, "The retired professor is ignoring all of her messages, but she just keeps trying to get in touch. She even asks legaladvice "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." (see exhibit 6)

21. Defendant Also mocked Plaintiff's anxiety disorder both the post itself and the comment sections. (see exhibit 6)

22. Plaintiff is easily identifiable by this post. Defendant, for example, mentioned a specific situation unique to Plaintiff (that anyone involved would have recognized if they saw Defendant's post), listed Plaintiff's gender and age (37 is an uncommon age of university attendance), described a combination of unusually personality traits (anxiety, fear of germs, not wanting to relocate etc.), and detailed Plaintiff's anxiety over her paper, her grade on it (A-), etc. The combination of this information, together with her username (indicating a Las Vegas area code and a narrow range of birthdates), again, makes her easily recognizable.

23. On Dec. 16th, soon after Defendant published their libelous post re: Plaintiff, a Redditor alerted her to it. Plaintiff then deleted her posts.

24. Defendant immediately retrieved them using removeddit links, and edited the post to let everyone know that the removeddit links had been added.

25. Defendant continued harassing Plaintiff across Reddit from both their then main accounts, u/thestickystickman, and at least one other account, u/DovahzulsABadConlang, which they later revealed was them. (see exhibit 7 and 13) For example, they would deliberately provoke Plaintiff by condescendingly telling her to “stop” and responding “lol” when she expressed feeling bullied by them and reporting their harassment to US law enforcement. They even followed her onto a new account she made to escape their harassment (and that which she incited) and responded, “Gemini. It’s time to stop,” when she inquired about suing them. They would also share the libelous SRD post on Plaintiff’s posting threads (see exhibit 8, “Oh, it gets worse” comment by DovahzulsABadConlang; it’s a link to the libelous post), mock Plaintiff’s anxiety by feigning distress over professors not responding to them or the tone of their responses (see exhibit 8) and continued referring to plaintiff as a “stalker” (and variations such as a “creepy” or “mentally unstable stalker” etc.)

26. Exhibit 8 is not the entirety of Defendant’s harassment. Their post also incited a countless number of others to harass her. Some of this harassment was from troll accounts impersonating UNLV faculty members—using their names as usernames. One account, for example, was called “glasses_of_gallo.” Another was “not_gallo” and another “paintings_of_fawns.” Plaintiff suspects that Defendant was behind these accounts since the usernames were consistent with their love of wordplay and the writing style seemed like them. For example, the u/paintings_of_fawns account (named for then UNLV Art Professor Fawn Douglas whom Plaintiff stayed with for a few days) called her a “creepy stalker.” Plaintiff has requested the basic subscriber information from these accounts from Reddit . (See subpoena Duces Tecum and exhibits 22 and 37)

27. 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. However, they did warn Defendant to stop harassing Plaintiff. (see exhibits 9 and 10)

28. Defendant then created another account and created a post on r/LegalAdvice 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 and what do I do?* In this same post, he shared his libelous post and told the sub that Plaintiff “stalked her professor.” (See exhibit 13)

29. The next day, they posted an update in which they confirmed that the warning was real. In this update, they also referred to Plaintiff as a “mentally unstable” stalker and said “..fortunately, she lives on the other side of the world from me.” (See exhibit 10) They later moved within less than a 2 hour flight from her.

30. Even after confirming the warning's legitimacy with the South Yorkshire Police, they continued to mock Plaintiff, reference and share their libelous SRD post, and would laugh at and brag about having the police called on them. For example, they added the banner, *Unironically had the police called on me bcof an SRD post* to the post.

31. Within a few months, Defendant created another account, u/Asticky_ and continued this harassment. After learning that Plaintiff had reported their harassment to the graduate schools they applied to (and showing them the police warning for them to stop), they deleted the contents of this account. (see exhibit 11)

32. In February of 2020 Plaintiff received a cease and desist letter from UNLV, requesting that she stop trying to retract the grievance and instructed her to direct all communications with UNLV to Debra Pieruscka, their assistant general counsel. This letter was for contacting administration to retract the grievance, not for directly contacting Dr. Gallo. (See exhibit 19) The letter also said "This letter is not intended as, and may not be construed to be, a complete recitation of facts and circumstances surrounding this matter." (See exhibit 19). Plaintiff then called Debra to ask what "facts" she was referring to, and Debra told Plaintiff that she had seen her activity on Reddit (clearly referring to the posts linked in the SRD post). Plaintiff fell silent at that point and agreed to abide by the cease and desist letter.

33. At no point was Plaintiff criminally charged with stalking, nor were any civil actions taken against her. Plaintiff has since obtain a police statement from UNLV's police services confirming that they had no records on her. (See exhibit 30)

34. Even over a year after the libelous SRD post re: Plaintiff was published, people continued sharing it and asking for updates on her.

35. Around February 1, 2021, Plaintiff applied to the University of Nevada Reno (UNR) for a Masters of Arts degree in history. The minimum requirements for acceptance into the program were a 2.75 GPA, 2 reference letters, and a statement of purpose "discussing your interests and plans for study and professional work." The GRE requirement was waived in 2021, and Plaintiff did not take it. Plaintiff applied with a 3.93 GPA, 6 graduate level credits (2 courses), and a statement of purpose detailing how her research interest fit into the program. She also had two supportive letters of recommendation from community college professors at CSN, but because of the cease and desist letter, did not have any letters from UNLV professors.

36. Prior to applying, Plaintiff had contacted UNR history professor, Dr. Emily Hobson, about potentially advising her. In this letter, Plaintiff mentioned that Dr. Gallo had inspired her into her intended subfields (History of Sexuality/20th Century History). To that Dr. Hobson replied "I absolutely understand your admiration for Dr. Gallo." After that initial email exchange, Dr. Hobson stopped speaking to Plaintiff. Then, on March 16th, 2021, Plaintiff was notified of her rejection from UNR.

37. When she initially followed up with their Graduate Program Director, Dr. Edward “Ned” Schoolman, he initially said that it was due to “faculty leaves, budget cuts, etc.” However, Dr. Hobson, in her initial email correspondence with Plaintiff, indicated that she was accepting students. In fact, she seemed to like Plaintiff’s research proposal. (This email was on Plaintiff’s old UNLV student account which is now closed.)

38. After filing this lawsuit, Plaintiff again contacted UNR to get more information about her rejection. After being ignored by Dr. Schoolman, she contacted the Dean’s Office (of UNR’s College of Liberal Arts), and eventually spoke to Dr. Linda Curcio-Nagy, their assistant dean and professor of history. Dr. Curcio said that not having reference letters from upper division professors was a red flag, and she discouraged Plaintiff from reapplying. Plaintiff also mentioned Dr. Hobson ignoring her and told Dr. Curcio that she had a screenshot of the unanswered email, which she would be using as an exhibit in a defamation suit against a 3rd party. Dr. Hobson then replied to the email (after Plaintiff’s exchange with Dr. Curcio), declining to advise Plaintiff if she reapplied.

39. Plaintiff is humiliated by the defamatory Subreddidrama post, which portrays her as an “insane” student who first tried to coerce Dr. Gallo to work on a project with her (by telling her that “they would collaborate on it”) and then “stalked” her, “thinking that she would make this up to her and become her best friend etc.”

40. 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.

41. Plaintiff feels that she can never have a dignified professional image because of that libelous post.

42. Defendant’s post and harassment caused Plaintiff to experience physical symptoms such as chest tightness, tachycardia, and general distress. Plaintiff took anxiety medication to help with these symptoms (see exhibit 36)

III. CLAIMS FOR RELIEF

A. LIBEL PER SE

43. Defendant made false statements of fact against Plaintiff. They were:

“ 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.”

“...so she applies a proposal for a conference, gets accepted, and *then* tells her professor about it and that they would collaborate on it.”

"...as OP already knew at that point, the professor was retiring after that semester."

"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." (Plaintiff never tried to have the Dean, Dr. Jennifer Keene, demoted.)

"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."

42. All of Defendant' allegations relate to Plaintiff's profession/education and make her less likely to be accepted into a graduate program.

43. Defendant made an unprivileged publication to millions of people.

44. As a result of these statements, Plaintiff 1) Received a cease and desist letter from UNLV and 2) Was rejected from UNR.

B. PORTRAYAL IN A FALSE LIGHT

45. Defendant took posts that Plaintiff had made (and deleted) and used them to give the public the false impression that she engaged in the behavior detailed above and in his libelous SRD post.

46. This false impression (detailed above) would be highly offensive to a reasonable person.

C. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

47. Defendant's conduct was extreme and outrageous

48. Defendant intended to cause or acted with reckless disregard for the truth. This is evident based on the platform they shared their libelous post on (SRD), their continuous sharing it, their subsequent harassment, and the fact that their defamatory statements contradict the information Plaintiff shared in her posts.

49. Defendant made his defamatory post knowing that Plaintiff had an anxiety disorder, and he even mocked her for it.

50. As a proximate result of such conduct, Plaintiff suffered severe emotional distress. This included humiliation, loss of dignity, and experiencing physical symptoms of stress (i.e. chest tightness etc.)

WHEREFORE, Plaintiff prays for the following relief:

1. An injunction for the libelous subredditdrama post to be removed. Defendant should have to incur the full monetary cost of this removal, including future subpoenas to Reddit etc.
2. An injunction for a restraining order to prevent further harassment from Defendant, especially since they now know Plaintiff's identity and location.
3. For special damages of \$19, 200 for the lost opportunity to attend UNR. 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 earned \$19,200 over those two years.
4. For general damages for past, present, and future pain and suffering (and other damages) in excess of \$15,000.
5. For \$1, 164 in investigator/process server fees and court costs. (An exhibit documenting these costs will later be provided.)
6. For such other and further relief as this court deems just and equitable.

DATED this 27th of December, 2021

/s/Lisa Breslaw
Lisa Breslaw,
7050 Shady Palms St.
Las Vegas, NV 89131
702-488-6989
Plaintiff, In Proper Person



EXHIBIT INDEX
EXHIBITS 38-39 (Merged)

Exhibit 38: Receipts of Plaintiffs' fees for the private investigators and process servers involved in locating and serving Defendant as well as the \$270 filing fee. This does not include the \$3.50 fee for each filing.

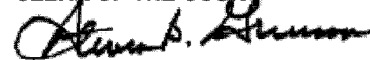
Clarification: Plaintiff's initial bill for PI Jan Payne was \$157.60. She then received a partial refund from her for \$72.60.

Exhibit 39: Plaintiff's UNLV transcript showing that she graduated magna cum laude with a 3.93 GPA, 4.0 history GPA, and had taken six credits (2 history courses) at the graduate level. The graduate level courses were HIST 606B (American West Since 1849) and HIST 616B (US Since 1945). These credits can be found on page 2 of the transcript.

LV Process and Investigations, LLC

License #2039 10829 Whipple Crest Ave.
Las Vegas, NV 89166
Phone: 702-592-3283 Fax: 702-446-8118
47-3771459

Electronically Filed
12/28/2021 1:15 AM
Steven D. Grierson
CLERK OF THE COURT

**Invoice # 14224**

Client Info:	Invoice Info:
Lisa Breslaw - ATTN: Lisa Breslaw Lisa Breslaw 7050 Shady Palms St. Las Vegas, NV 89131	Client Ref # Job # 14224 Invoice Date: 7/21/2021 Client ID: 990

Case Info:
Court Name: Eighth Judicial District Court Court Division: Dept. No.: 3 Case # A-21-837948-C Plaintiff: Lisa Breslaw -versus- Defendant: Peter Cooper

Service Info:
Serve To: Peter Cooper Service: NO SERVICE Date: 10/19/2021 Time: 01:00 PM Location: 398 Columbus Ave. #57, Boston, MA 02116

Payment Memo:
Payment - Credit Card # paypal Amount Applied = \$28.00 Date Applied = 10/19/2021 Job # 14224 - Case # A-21-837948-C
Payment - Credit Card # paypal Amount Applied = \$60.00 Date Applied = 10/19/2021 Job # 14224 - Case # A-21-837948-C
Payment - Credit Card # PayPal Amount Applied = \$50.00 Date Applied = 7/21/2021 Job # 14224 - Case # A-21-837948-C

Qty:	Description	Unit Price:	Line Amount:
1	Skip Trace	\$50.00	\$50.00
1	Local service	\$60.00	\$60.00
1	Postage - Over night to P.O. Box	\$28.00	\$28.00
1	Local service - Attorney - Sagar Raich, Esq., 6785 S. Eastern Ave. Ste. 5, Las Vegas, NV	\$60.00	\$60.00
Sub Total			\$198.00
Amount Paid to Date			\$138.00
TOTAL			\$60.00



1 of 1

INVOICE

True Investigations
7582 Las Vegas Boulevard
South, #183
Las Vegas, NV 89123

jenniferk@trueinvestigations.net
(702) 902-2730
www.trueinvestigations.net



Lisa Breslaw

Bill to
Lisa Breslaw

Invoice details
Invoice no. : 1168
Invoice date : 08/04/2021
Due date : 08/04/2021

Product or service	Amount
--------------------	--------

1. Retainer	\$500.00
Locate	

2. 5% credit card fee	\$25.00
-----------------------	---------

Ways to pay



Note to customer
Thank you for your business.

Pay invoice

Total	\$525.00
-------	----------

Due date	08/04/2021
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Paid with

Bank of America CashPay

VISA Card x-4485

You'll see "PAYPAL "jdcopi" on your card statement.

Contact info

Message Jan Payne

idcopi@aol.com

\$157.60

Details

Sent to Jan Payne

\$157.60

Ship to

Lisa Breslaw

5070 Shady Palms St

Las Vegas, NV 89131

United States

Transaction ID

6UN76916UC496632J

 [Print details](#)

We'll use cookies to improve and customize your experience if you continue to browse. Is it OK if we also use cookies to show you personalized ads?

[Learn more and manage your cookies](#)

Yes, Accept Cookies



Date: October 26, 2021

Receipt #: 102621

IN RE: Cooper Locate and SOP

Thank you for your business!

375

Superior Court of California,
County of San Francisco

Oct-21-2021 W1521A215001 BLIU
09:55:15

CASE NUMBER: - -

SUBPENA IN OUT OF STATE CASE

FILED BY

FEE: \$45.00 PAID BY CHECK

THANK YOU

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, as follows:

Do not release the requested records to the deposition officer prior to the date and time stated above.

- ☐ Continued on Attachment 4 (use form MC-025).

PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	CASE NUMBER (of action pending outside California):
--	---

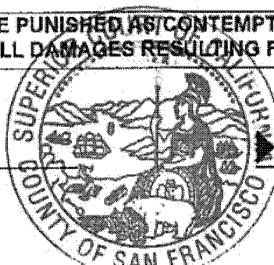
5. If you have been served with this subpoena as a custodian of consumer or employee records under Code of Civil Procedure section 1985.6 and a motion to quash or an objection has been served on you, a court order or agreement of the parties, witnesses, and consumer or employee affected must be obtained before you are required to produce consumer or employee records.
6. ☐ Other terms or provisions from out-of-state subpoena, if any (*specify*):

☐ Continued on Attachment 6 (use form MC-025).

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: **OCT 21 2021**

BOWMAN LIU
(TYPE OR PRINT NAME)



[Signature]
(SIGNATURE OF PERSON ISSUING SUBPOENA)
CLERK OF THE COURT
(TITLE)

**PROOF OF SERVICE OF SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

- I served this *Subpoena for Production of Business Records in Action Pending Outside California* by personally delivering a copy to the person served as follows:
 - Person served (*name*):
 - Address where served:
 - Date of delivery:
 - Time of delivery:
 - Witness fees and mileage both ways (*check one*):
 - ☐ were paid. Amount: \$ _____
 - ☐ were not paid.
 - ☐ were tendered to the witness's public entity employer as required by Government Code section 68097.2. The amount tendered was (*specify*): \$ _____
 - Fee for service: \$ _____
- I received this subpoena for service on (*date*):
- ☐ I also served a completed *Proof of Service of Notice to Consumer or Employee and Objection* (form SUBP-025) by personally delivering a copy to the person served as described in 1 above.
- Person serving:
 - ☐ Not a registered California process server
 - ☐ California sheriff or marshal
 - ☐ Registered California process server
 - ☐ Employee or independent contractor of a registered California process server
 - ☐ Exempt from registration under Business and Professions Code section 22350(b)
 - ☐ Registered professional photocopier
 - ☐ Exempt from registration under Business and Professions Code section 22451
 - Name, address, telephone number, and, if applicable, county of registration and number:

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

Date:



(SIGNATURE)

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:



(SIGNATURE)

ORIGINAL

SUBP-030

BY FAX

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Lisa Breslaw 7050 Shady Palms St. Las Vegas, NV 89131 TELEPHONE NO.: 702-488-8989 FAX NO. (Optional): E-MAIL ADDRESS (Optional): lisa.breslaw@alumni.unlv.edu ATTORNEY FOR (Name):	FOR COURT USE ONLY
Court for county in which discovery is to be conducted: SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 750 9th Street MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95814 BRANCH NAME: Judicial	
Court in which action is pending: Name of Court: 8th Judicial District Ct. of Las Vegas STREET ADDRESS: 200 Lewis Ave. MAILING ADDRESS: CITY, STATE, AND ZIP CODE: Las Vegas, NV 89131 COUNTRY: Clark	
PLAINTIFF/PETITIONER: Lisa Breslaw DEFENDANT/RESPONDENT: Peter Cooper	CALIFORNIA CASE NUMBER (if any assigned by court):
APPLICATION FOR DISCOVERY SUBPOENA IN ACTION PENDING OUTSIDE CALIFORNIA	CASE NUMBER (if action pending outside California): A-21-837948-C

- Applicant (name): **Lisa Breslaw** is (check one):
☒ Plaintiff ☐ Petitioner ☐ Defendant ☐ Respondent ☐ Other (specify):
 In the above action.
- Applicant requests that this court issue a subpoena for discovery under Code of Civil Procedure sections 2029.100 – 2029.800 to (name and address of deponent or person in control of property):
Custodian of Records for Reddit, Inc. 1455 Market Street, Suite #1600, San Francisco, CA 94103
- Attached is (check one): ☐ the original ☒ a true and correct copy of the document from the court in which the action is pending that requires the person in 2 to (check all that apply):
 - ☐ attend and give testimony at a deposition;
 - ☒ produce and permit inspection and copying of designated materials, information, or tangible things in the possession, custody, or control of the deponent;
 - ☐ permit the inspection of premises under the control of the deponent.
- Applicant submits with this application a proposed subpoena that includes terms identical to those in the document from the out-of-state court. (Code of Civil Procedure section 2029.300(d).)

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

Date: **9/15/2021**

Lisa Breslaw

(TYPE OR PRINT NAME)

(SIGNATURE OF ATTORNEY OR PARTY WITHOUT ATTORNEY)

Note: This application must be accompanied by the fee specified in Government Code section 70628. A discovery subpoena must be personally served on the deponent in compliance with California law, including Code of Civil Procedure section 1985.

ORIGINAL

Electronically Filed
10/19/2021 12:24 PM
Steven D. Grierson
CLERK OF THE COURT

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.edu

- ☒ 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

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)

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 date 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.: _____

1. That the deponent is the _____ (position or title) of _____
 _____ (name of employer) and in his or her capacity as _____
 _____ (position or title) is a custodian of the records of _____
 _____ (name of employer).

3. That on the ____ day of the month of _____ of the year _____, the deponent was served with a subpoena in connection with the above-entitled cause, calling for the production of records pertaining to _____

5. That the original of those records was made at or near the time of the act, event, condition, opinion or diagnosis recited therein by or from information transmitted by a person with knowledge, in the course of a regularly conducted activity of the deponent or _____
(name of employer).

SUBSCRIBED AND SWORN to before me this _____ day of _____, 20____.

387

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address)		TELEPHONE NUMBER	FOR COURT USE ONLY
Lisa Breslaw 7050 Shady Palms St. Las Vegas, NV 89131 ATTORNEY FOR Plaintiff		(702) 488-6989	
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	TIME	DEP./DIV.	CASE NUMBER:
11/12/2021	4:45 PM		A-21-837948-C
Proof of Service Civil Subpoena			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

Eighth Judicial District Court Portal

Financial			
Breslaw, Lisa D.			
	Total Financial Assessment		\$270.00
	Total Payments and Credits		\$270.00
7/16/2021	Transaction Assessment		\$270.00
7/16/2021	Effie Payment	Receipt # 2021-44145-CC...	Breslaw, Lisa D. (\$270.00)
Cooper, Peter			
	Total Financial Assessment		\$223.00
	Total Payments and Credits		\$223.00
11/3/2021	Transaction Assessment		\$223.00
11/3/2021	Effie Payment	Receipt # 2021-68028-CCC...	Cooper, Peter (\$223.00)

Unofficial Transcript

Student ID: 5001510444

Name: Breslaw, Lisa Danielle

06/22/2021

Page 1 of 2

Order Nbr:

001548576

Degrees Awarded

Degree: Bachelor of Arts
Confer Date: 12/15/2018
Degree Honors: Magna Cum Laude
Plan: Interdisciplinary Studies-Social Science Studies

Not reserved for graduate credit: Hist 606
Reserved for Graduate Credit: HIST616B
HIST 616B Not Reserved for Graduate Credit.

2017 Spring

			<u>Att</u>	<u>Ehr</u>	<u>Grd</u>		
PSY	496	Adv Independent Study	3.00	3.00	A		
Course		Service Learning Course					
Attributes:							
SOC	101	Principles of Sociology	3.00	3.00	A		
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Term Totals:			6.00	6.00	24.00	4.00	12.00
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Cumulative Totals:			27.00	27.00	107.10	3.96	53.10

2017 Summer

			<u>Att</u>	<u>Ehr</u>	<u>Grd</u>		
HIST	406B	Am West Since 1849	3.00	3.00	A		
PSC	101	Intro Amer Politics	4.00	4.00	A		
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Term Totals:			7.00	7.00	28.00	4.00	14.00
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Cumulative Totals:			34.00	34.00	135.10	3.97	67.10

Beginning of Undergraduate Record

Transfer/Test Credits

Broward College North Campus TRANSFER CREDIT 25.00
College of Southern Nevada TRANSFER CREDIT 37.00

2016 Spring

			<u>Att</u>	<u>Ehr</u>	<u>Grd</u>		
HIST	441	American Environ Hist	3.00	3.00	A		
IDS	201	Interdisciplinary Studies	3.00	3.00	A		
LAS	100	Intro Latina/o Studies	3.00	3.00	A-		
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Term Totals:			9.00	9.00	35.10	3.90	17.10
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Cumulative Totals:			9.00	9.00	35.10	3.90	17.10

2016 Summer

			<u>Att</u>	<u>Ehr</u>	<u>Grd</u>		
IDS	240	Interdisciplinary Research Met	3.00	3.00	A		
PSY	341	Abnormal Psychology	3.00	3.00	A		
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Term Totals:			6.00	6.00	24.00	4.00	12.00
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Cumulative Totals:			15.00	15.00	59.10	3.94	29.10

2016 Fall

NURS	140	Medical Terminology	Att	Ehr	Grd		
PSY	350	Indust & Org Psy	3.00	3.00	A		
			3.00	3.00	A		
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Term Totals:			6.00	6.00	24.00	4.00	12.00
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Cumulative Totals:			21.00	21.00	83.10	3.95	41.10

2017 Fall

			<u>Att</u>	<u>Ehr</u>	<u>Grd</u>	
HIST	228	Latin Amer Hist & Cult II	3.00	3.00	A	
IDS	494	Interdisciplinary Inquiry	3.00	3.00	A	
PSY	316	Foundations of Cognitive Psych	3.00	3.00	A	
PSY	496	Adv Independent Study	3.00	3.00	A	
Course		Service Learning Course				
Attributes:						
		<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Term Totals:		12.00	12.00	48.00	4.00	24.00
		<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Cumulative Totals:		46.00	46.00	183.10	3.98	91.10
Term Honor:		Dean's Honor List				

2018 Spring

			<u>Att</u>	<u>Ehr</u>	<u>Grd</u>		
HIST	456	Status & Freedom	3.00	3.00	A		
IDS	495A	IDS Capstone	3.00	3.00	B+		
SOC	431	Crime Crim Behavior	3.00	3.00	A		
SOC	441	Social Inequality	3.00	3.00	A		
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Term Totals:			12.00	12.00	45.90	3.82	21.90
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Cumulative Totals:			58.00	58.00	229.00	3.94	113.00
Term Honor:			Dean's Honor List				

Unofficial Transcript

Student ID: 5001510444

Name: Breslaw, Lisa Danielle

06/22/2021

Page 2 of 2

Order Nbr:

001548576

2018 Summer

			<u>Att</u>	<u>Ehr</u>	<u>Grd</u>		
HIST	110	Multicult Amer:Sexuality	3.00	3.00	A		
HIST	362	Passions/Fran Since 1815	3.00	3.00	A		
HIST	606B	Am West Since 1849	3.00	3.00	A		
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Term Totals:			9.00	9.00	36.00	4.00	18.00
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Cumulative Totals:			67.00	67.00	265.00	3.95	131.00

2018 Fall

			<u>Att</u>	<u>Ehr</u>	<u>Grd</u>		
HIST	616B	US Since 1945	3.00	3.00	A		
PSY	360	Foundations Social Psychology	3.00	3.00	B+		
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Term Totals:			6.00	6.00	21.90	3.65	9.90
			<u>Att</u>	<u>Earned</u>	<u>Points</u>	<u>GPA</u>	<u>GP Bal</u>
Cumulative Totals:			73.00	73.00	286.90	3.93	140.90

Undergraduate Career Totals

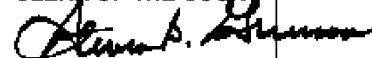
Cumulative Totals:			73.00	135.00	286.90	3.93	140.90
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End of Unofficial Transcript

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DISTRICT COURT
CLARK COUNTY, NEVADA

Electronically Filed
12/28/2021 11:58 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 [76] Plaintiff's Motion to Amend Complaint in the above-entitled matter is set for hearing as follows:

Date: February 03, 2022
Time: Chambers
Location: Chambers
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/ Kadir Beckom
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/ Kadir Beckom
Deputy Clerk of the Court



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
16
17 Title of Nonconforming Document:

Errata for Motion for Leave to File
a Sur-Reply to Defendant's Motion
to Dismiss and the Attached Sur-
Reply

18 Party Submitting Document for Filing:

Plaintiff

19 Date and Time Submitted for Electronic
20 Filing:

12/15/2021 at 9:51 PM

21 Reason for Nonconformity Determination:

- 22
23 ☐ The document filed to commence an action is not a complaint, petition,
24 application, or other document that initiates a civil action. *See* Rule 3 of the
25 Nevada Rules of Civil Procedure. In accordance with Administrative Order 19-5,
26 the submitted document is stricken from the record, this case has been closed and
27 designated as filed in error, and any submitted filing fee has been returned to the
28 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: 28th day of December, 2021

By: /s/ Chaunte Pleasant
Deputy District Court Clerk

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CERTIFICATE OF SERVICE

I hereby certify that on December 28, 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)

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
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18 Title of Nonconforming Document:

Errata to 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

19 Party Submitting Document for Filing:

Plaintiff

20
21 Date and Time Submitted for Electronic
Filing:

12/24/2021 at 12:10 AM

22
23 Reason for Nonconformity Determination:

- 24 ☐ The document filed to commence an action is not a complaint, petition,
25 application, or other document that initiates a civil action. See Rule 3 of the
26 Nevada Rules of Civil Procedure. In accordance with Administrative Order 19-5,
27 the submitted document is stricken from the record, this case has been closed and
28

1 designated as filed in error, and any submitted filing fee has been returned to the
2 filing party.

3 ☐ The document initiated a new civil action and a cover sheet was not submitted as
4 required by NRS 3.275.

5 ☒ The document was not signed by the submitting party or counsel for said party.
6

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.
18

19
20 Dated this: 28th day of December, 2021
21

22 By: /s/ Chaunte Pleasant
23

24 Deputy District Court Clerk
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By: /s/ Chaunte Pleasant
Deputy District Court Clerk



ERRATA FOR AMENDED COMPLAINT

Paragraph 2: "She had a 3.93 cumulative GPA, 4.0 history GPA, and completed 6 graduate-level credits (not classes, Plaintiff completed 2 graduate-level classes at 3 credits each).

Paragraph 3: See exhibit 36 (Plaintiff's medical records, which document her GAD/OCD.)

Paragraph 10: (Clarification) At the time of her "complaint" to Dr. Kirk, Plaintiff did not specify that she had an anxiety disorder; she only expressed becoming anxious over Dr. Gallo's "tone." Thus, in retracting the grievance, she disclosed her anxiety disorder to several administrators and staff in an attempt to mitigate any consequences to Dr. Gallo.

Paragraph 11: (Clarification) Dean Keene denied the conversation she supposedly had with Dr. Gallo (described in the paragraph). She, to Plaintiff's knowledge, has not denied having this conversation with Plaintiff (telling Plaintiff she spoke to Dr. Gallo and knew she [Dr. Gallo] was not upset with her etc.).

Paragraph 22: unusual (not unusually) personality traits

Paragraph 25: "They even followed her onto a new account she made to escape their harassment (and that which *Defendant* incited). The pronoun "she" [instead of "Defendant" or "they"] was an error, not a reference to Plaintiff.

Paragraph 26:: "For example, the u/paintings_of_fawns account (named for then UNLV Art Professor, Fawn Douglas, whom Plaintiff stayed with for a few days) called her a "scary stalker." (Plaintiff initially typed "creepy stalker," though Defendant called her "creepy" at other points in his harassment. Plaintiff, however, still believes this account was theirs.) Again, she is trying to get the records for this account from Reddit.

Paragraph 34: (See exhibit 12)

Paragraph 45:(Clarification) Although Defendant shared his libelous post with millions of people on r/subredditdrama (and throughout Reddit), he also, as stated in the post itself, knew that Plaintiff wanted to attend grad school and have an academic career in Las Vegas. This was another example of targeting NV.

Paragraph 48: continuously (not continuous)

*In the "prayer for relief" section: Plaintiff has subsequently recalculated the receipts in exhibit 8, and it comes to \$1,378 . Plaintiff asks that Defendant pays all further court costs for this suit as well.

Prayer for relief section #2: "An injunction for a restraining order to prevent further harassment from Defendant, especially since they now know Plaintiff's identity and location." By "location," Plaintiff meant that Defendant now has her address. They were aware of her location at the time they made their post and prior to her filing this suit (as exhibit 13 also indicates).



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Paragraph 2: "She had a 3.93 cumulative GPA, 4.0 history GPA, and completed 6 graduate-level credits (not classes, Plaintiff completed 2 graduate-level classes at 3 credits each).

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/s/Lisa Breslaw

Lisa Breslaw

7050 Shady Palms Street

Las Vegas, NV 8931

702-488-6989

lisa.breslaw@alumni.unlv.edu

Plaintiff, In Proper Person



Exhibit Index Sheet for Exhibits 40-41

Exhibit 40: *Obsessed With My Professor: An Intense Lesbian Romance* This novel, published in Sept. of 2020, and written by Las Vegas author Scarlett Fox (pen name), came up in a google search for "woman obsessed with her professor Las Vegas." Based on the plot summary, available content, as well as the timing of publication (Sept. 2020), it is based on the Defendant's defamatory post. Even the dialogue is nearly identical to Plaintiff's posts/comments, with only minor details changed, and there is the same 30 year age gap between "Katie" (the main character) and "Dr. Marin," the professor she pursues (apparently based on Plaintiff's description of Dr. Gallo). Additionally, Katie's "pink and blue hair" probably referenced Plaintiff's bisexuality. (Pink and Blue are the main colors of the bi flag, and Plaintiff was posting on r/bisexual at this time, questioning her sexuality).

This is further proof of Defendant's post having "local, on the ground effects" in Las Vegas. And again, Defendant knew Plaintiff resided in Las Vegas, and even shared his defamatory post in another post explicitly mentioning that Plaintiff lived here. (See exhibit 13)

Exhibit 41: This is another example of Defendant's harassment. Here, nine months after publishing his defamatory post, and even after the police warning, he continued mocking Plaintiff (i.e. feigning distress over professors not responding to him).

Obsessed With My Professor: An Intense Lesbian Romance

It must have been so different for Doctor Marin. I've known I was gay since I was a little girl, and it's pretty much been okay. I grew up in a liberal town and my family didn't care at all. There were a few people who got weird about it, but nothing that was a big deal. I had a girlfriend by my sophomore year of high school and nobody gave us any hassle.

But Doctor. Marin was forty-eight. She grew up in a different time. And she was gorgeous, which probably made it tougher. Knowing guys, especially back then, they were probably really annoyed to see that the hot chick was gay, like it was her fault they weren't getting laid.

I knew how old she was because I read all about her before I signed up for her Creative Writing 101 class. When I read reviews online there was a reference to the fact that she was gay, which caught my attention. She got good reviews from students and she'd published a couple novels, which I read. They were fantastic.

I love to read. And knowing that she had written amazing

looked at the pocket. DEF 29% of sample



Scarlet Fox

Obsessed With My Professor: An Intense Lesbian Romance

Kindle Edition: \$6.99



Buy now with 1-Click

By clicking "Buy now with 1-Click", you agree to Amazon's Kindle Store Terms of Use. Sold by Amazon.com Services LLC

kind unlimited

This title and over 1 million more available with Kindle Unlimited.

LAUREL & STONE.

I love to read. And knowing that she had written amazing books had me hooked. Definitely signing up for that class.

I got to class early on the first day. I had already downloaded the syllabus and read it twice. I really wanted to crush this class and hopefully impress the professor. When I saw her I realized that I might have blown my chance at a good first impression.

She was wearing a pencil skirt and a button down shirt, ultra professional, and every crease was perfect. She looked like the CEO of a multinational corporation or the dean of the math department. I looked like a crazy lesbian with mommy issues. I hope that being cute would score me a point or two and being young and gay might garner some sympathy.

I had pink and blue hair, a hoodie and jeans, and my nails were gray with pink triangles. At least she would definitely know I was gay as soon as she shook my hand. Maybe we would bond a little bit.

"Ms. Marin?" I asked, as if I didn't know.

**"Present," she answered. I smiled. At least she had a sense of
38% of sample**

38% of sample



Obsessed With My Professor: An Intense Lesbian Romance

Kindle Edition: \$6.99



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impress me the way professor Marin did. She was so poised, so professional, so confident. I found the whole package intoxicating. I'd never been so attracted to a woman in my life.

"I'll definitely do my best," I said, awkward as hell. I knew I was flustered and should have found my seat and talked to her later when I was more composed, but I also didn't want to leave her presence. She helped me out by gently dismissing me.

"You better grab a good seat then," she said. "The front fills up on the first day because everybody wants to make a good impression."

"Oh yeah," I said. "Better do that. Really nice to meet you."

I headed off to find a seat, thinking about what she had said. Did she mention first impressions because I made a bad one? Was she letting me know that my attempt to suck up to her was pointless because she was used to it and that lots of other students were going to try the same thing? I was such a nerd, like a child with a cute little crush on a grown adult. My first class in college and I already felt like an idiot.

I took a seat in the second row so I could hide behind someone

54% of sample



Scarlet Fox

Obsessed With My Professor: An Intense Lesbian Romance

Kindle Edition: \$6.99

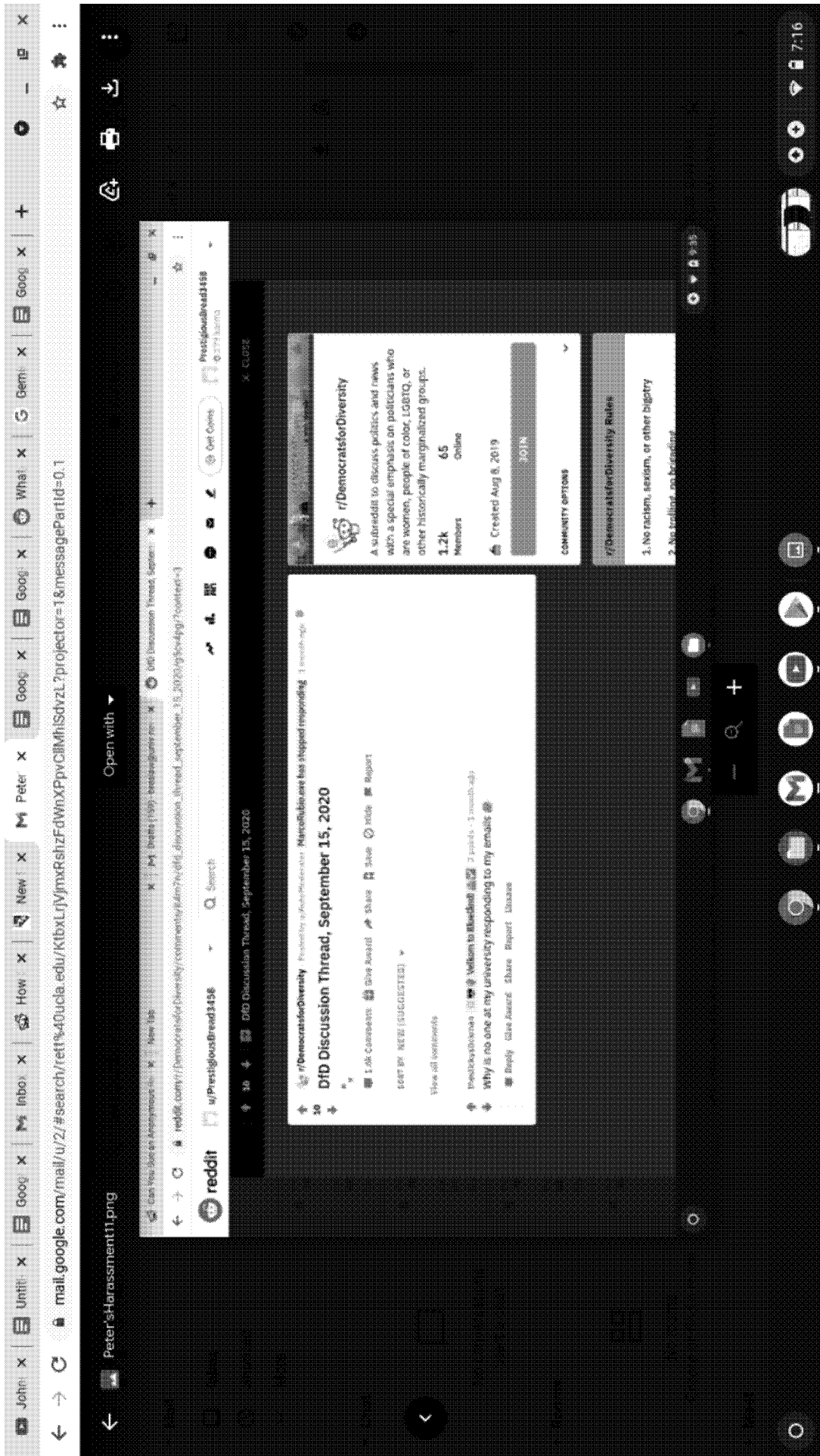


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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Department 3

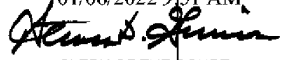
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CERTIFICATE OF SERVICE

I hereby certify that on January 03, 2022, 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


CLERK OF THE COURT

ORDR

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

ORDER

This matter having come on for hearing before the court on January 4, 2022 at 9:00 am, on Defendant's Motion to Dismiss Plaintiff's Complaint, Defendant PETER COOPER ("Defendant"), by and through Defendant's attorney of record, Sagar Raich, Esq. of Raich Law PLLC, and Plaintiff LISA BRESLAW ("Plaintiff"), pro se, appearing and the Court having considered the papers and pleadings on file, having heard arguments of Defendant's counsel and of the Plaintiff and being fully apprised, with good cause appearing, hereby **FINDS** as follows:

THAT under Nevada Rules of Civil Procedure 12(b)(2), a party can request a dismissal by motion of an opposing party's claims on the basis that the Court lacks jurisdiction over the requesting party. "To obtain jurisdiction over a non-resident defendant, a plaintiff must show: (1) that the requirements of the state's long-arm statute have been satisfied, and (2) that due process is not offended by the exercise of jurisdiction." *Trump v. Eighth Judicial Dist. Court of State of Nev. In and For County of Clark*, 857 P.2d 740, 109 Nev. 687 (Nev., 1993). "First, Nevada's long-arm statute, NRS 14.065, reaches the limits of due process set by the United States

1 Constitution.'..." *Arbella Mut. Ins. Co. v. Dist. Ct.*, 134 P.3d 710, 122 Nev. 509 (Nev., 2006)
2 quoting *Baker v. Dist. Ct.*, 116 Nev. 527, 531, 999 P.2d 1020, 1023 (2000). "Second, the Due
3 Process Clause of the Fourteenth Amendment requires a nonresident defendant to have
4 'minimum contacts' with the forum state sufficient to ensure that exercising personal jurisdiction
5 over him would not offend 'traditional notions of fair play and substantial justice'" *Arbella*
6 quoting *Baker v. Dist. Ct.*, at 531-32, 999 P.2d at 1023 (quoting *Mizner v. Mizner*, 84 Nev. 268,
7 270, 439 P.2d 679, 680 (1968) (citing *Internat. Shoe Co. v. Washington*, 326 U.S. 310, 316, 66
8 S.Ct. 154, 90 L.Ed. 95 (1945))). "The defendant must have sufficient contacts with the forum
9 such that he or she could reasonably anticipate being haled into court there. " *Arbella* quoting
10 *Trump*, 109 Nev. at 699, 857 P.2d at 748.

11 **THAT** "a defendant's contacts with a state are sufficient to meet the due process
12 requirement if either general personal jurisdiction or specific personal jurisdiction exists."
13 *Arbella Mut. Ins. Co. v. Dist. Ct.*, 134 P.3d 710, 122 Nev. 509 (Nev., 2006). "General personal
14 jurisdiction exists when the defendant's forum state activities are so 'substantial' or 'continuous
15 and systematic' that it is considered present in that forum and thus subject to suit there, even
16 though the suit's claims are unrelated to that forum." *Id.* Additionally, "with regard to whether
17 specific personal jurisdiction exists... [a] state may exercise specific personal jurisdiction only
18 where: (1) the defendant purposefully avails himself of the privilege of serving the market in the
19 forum or of enjoying the protection of the laws of the forum, or where the defendant
20 purposefully establishes contacts with the forum state and affirmatively directs conduct toward
21 the forum state, and (2) the cause of action arises from that purposeful contact with the forum or
22 conduct targeting the forum.

1 **THAT** in determining whether specific personal jurisdiction exists, a court must consider
2 whether requiring the defendant to appear in the action would be reasonable.” *Id.*

3 **THAT** in this matter, Plaintiff alleges that “Defendant...resided in ...UK at the relevant
4 time herein...” *See Complaint*, Para. 2, on file herein; Therefore, Plaintiff admits that Defendant
5 was not residing in Nevada throughout the time relevant to the Defendant’s alleged actions.

6 **THAT** it would offend traditional notions of fair play and substantial justice to have the
7 Defendant be hailed in to a Nevada court.

8 **THAT** Defendant did not meet minimum contacts with Nevada to be brought into Court
9 in the State of Nevada.

10 **THAT** the Court heard arguments for failure to state a claim as well as arguments
11 regarding NRS 41.650, but Dismissal of the matter is warranted for failure of this Court to be
12 able to exercise personal jurisdiction over the Defendant.

13 Based on the foregoing, the Court **ORDERS** as follows:

14 **IT IS HEREBY ORDERED** that Defendant’s Motion to Dismiss is **GRANTED** and
15 this matter is **DISMISSED**.

16 **IT IS HEREBY FURTHER ORDERED** that any pending motions are **DENIED** as
17 moot and any pending hearings are **VACATED**.

Dated this 6th day of January, 2022

18 **IT IS SO ORDERED.**

19 Respectfully submitted by:

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

E99 DC0 E527 F124
David Barker
Approved as District Court Judge by:

Refused to Approve
Lisa Breslaw
7050 Shady Palms St.
Las Vegas, NV 89131
Plaintiff, Pro Se

----- Forwarded message -----

From: **Lisa Breslaw** <lisa.breslaw@alumni.unlv.edu>
Date: Tue, Jan 4, 2022 at 1:25 PM
Subject: Re: Order
To: Sagar Raich <sraich@raichattorneys.com>

Dear Mr. Raich:

I do not approve of this form and content, and I am not consenting to having the case dismissed with prejudice. I will consent to have the case transferred to Federal Court or reheard in the district court under its sitting judge, the Honorable Monica Trujillo, but if you will not consent to either option, I plan on filing an appeal with the NV Supreme Court.

Sincerely,
Lisa Breslaw

On Tue, Jan 4, 2022 at 12:42 PM Sagar Raich <sraich@raichattorneys.com> wrote:

Ms. Breslaw,

Please see the attached Order regarding today's hearing. Please advise if you approve of the form and content. If you do not approve, or if we do not hear from you by 12:00 pm January 7, 2022, we will submit the Order to the Court and indicate that you didn't approve and/or that we didn't hear from you.

Sincerely,

Sagar Raich, Esq. ^{**}
Managing Member
Raich Law PLLC

^{*}Ranked the Most Powerful Business Lawyer in Las Vegas, NV by MyVegas Magazine (Top 100 Lawyers Issue)

[^]Top 40 Under 40 Business Lawyers in NV by the Association of American Trial Lawyers

['] Licensed in Nevada and California

Southern Las Vegas Offices:
6785 S. Eastern Ave. Suite 5
Las Vegas, NV 89119

1 CSERV

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA
4

5
6 Lisa Breslaw, Plaintiff(s)

CASE NO: A-21-837948-C

7 vs.

DEPT. NO. Department 3

8 Peter Cooper, Defendant(s)
9

10 **AUTOMATED CERTIFICATE OF SERVICE**

11 This automated certificate of service was generated by the Eighth Judicial District
12 Court. The foregoing Order was served via the court's electronic eFile system to all
13 recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 1/6/2022

15 Sagar Raich

sraich@raichattorneys.com

16 Brian Schneider

bschneider@raichattorneys.com

17 General Information Raich Law

info@raichattorneys.com

18 Lisa Breslaw

lisa.breslaw@alumni.unlv.edu

Electronically Filed
1/6/2022 11:37 AM
Steven D. Grierson
CLERK OF THE COURT



Dept. 3

No. A-21-837948-C

**IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA IN
AND FOR THE COUNTY OF CLARK**

Lisa Breslaw
Plaintiff

vs.

Peter Cooper
Defendant

NOTICE OF APPEAL

Notice is hereby given that Lisa Breslaw, PLAINTIFF above named, hereby, appeals to the Supreme Court of Nevada from the Order to Dismiss case A-21-837948-C (Breslaw vs. Cooper) entered in this action on the day of January 6, 2022.

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

CERTIFICATE OF SERVICE

I hereby certify that on Jan. 6, 2022, I served a true and correct copy of the foregoing:

NOTICE OF APPEAL FOR ORDER 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:

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



1 **NOTC**

2 Sagar Raich, ESQ.
3 NEVADA BAR NO. 13229
4 6785 S. Eastern Ave. Ste. 5
5 Las Vegas, NV 89119
6 Telephone: (702) 758-4240
7 Facsimile: (702) 998-6930
8 Email: sraich@raichattorneys.com
9 Attorney for Defendant, Peter Cooper

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

8 LISA BRESLAW;
9 Plaintiff(s),
10 vs.

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

11 PETER COOPER,
12 Defendant(s).

NOTICE OF ENTRY OF ORDER

11 PLEASE TAKE NOTICE THAT on January 6, 2022 an order was filed in which the
12 Court granted Plaintiffs' Motion to Dismiss, as stated in the Order on file herein and as attached
13 hereto as Exhibit 1.

14 Respectfully submitted by:

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
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EXHIBIT 1

ORDR

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.

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

PETER COOPER,
Defendant(s).

ORDER

This matter having come on for hearing before the court on January 4, 2022 at 9:00 am, on Defendant's Motion to Dismiss Plaintiff's Complaint, Defendant PETER COOPER ("Defendant"), by and through Defendant's attorney of record, Sagar Raich, Esq. of Raich Law PLLC, and Plaintiff LISA BRESLAW ("Plaintiff"), pro se, appearing and the Court having considered the papers and pleadings on file, having heard arguments of Defendant's counsel and of the Plaintiff and being fully apprised, with good cause appearing, hereby **FINDS** as follows:

THAT under Nevada Rules of Civil Procedure 12(b)(2), a party can request a dismissal by motion of an opposing party's claims on the basis that the Court lacks jurisdiction over the requesting party. "To obtain jurisdiction over a non-resident defendant, a plaintiff must show: (1) that the requirements of the state's long-arm statute have been satisfied, and (2) that due process is not offended by the exercise of jurisdiction." *Trump v. Eighth Judicial Dist. Court of State of Nev. In and For County of Clark*, 857 P.2d 740, 109 Nev. 687 (Nev., 1993). "First, Nevada's long-arm statute, NRS 14.065, reaches the limits of due process set by the United States

1 Constitution.'..." *Arbella Mut. Ins. Co. v. Dist. Ct.*, 134 P.3d 710, 122 Nev. 509 (Nev., 2006)
2 quoting *Baker v. Dist. Ct.*, 116 Nev. 527, 531, 999 P.2d 1020, 1023 (2000). "Second, the Due
3 Process Clause of the Fourteenth Amendment requires a nonresident defendant to have
4 'minimum contacts' with the forum state sufficient to ensure that exercising personal jurisdiction
5 over him would not offend 'traditional notions of fair play and substantial justice'" *Arbella*
6 quoting *Baker v. Dist. Ct.*, at 531-32, 999 P.2d at 1023 (quoting *Mizner v. Mizner*, 84 Nev. 268,
7 270, 439 P.2d 679, 680 (1968) (citing *Internat. Shoe Co. v. Washington*, 326 U.S. 310, 316, 66
8 S.Ct. 154, 90 L.Ed. 95 (1945))). "The defendant must have sufficient contacts with the forum
9 such that he or she could reasonably anticipate being haled into court there. " *Arbella* quoting
10 *Trump*, 109 Nev. at 699, 857 P.2d at 748.

11 **THAT** "a defendant's contacts with a state are sufficient to meet the due process
12 requirement if either general personal jurisdiction or specific personal jurisdiction exists."
13 *Arbella Mut. Ins. Co. v. Dist. Ct.*, 134 P.3d 710, 122 Nev. 509 (Nev., 2006). "General personal
14 jurisdiction exists when the defendant's forum state activities are so 'substantial' or 'continuous
15 and systematic' that it is considered present in that forum and thus subject to suit there, even
16 though the suit's claims are unrelated to that forum." *Id.* Additionally, "with regard to whether
17 specific personal jurisdiction exists... [a] state may exercise specific personal jurisdiction only
18 where: (1) the defendant purposefully avails himself of the privilege of serving the market in the
19 forum or of enjoying the protection of the laws of the forum, or where the defendant
20 purposefully establishes contacts with the forum state and affirmatively directs conduct toward
21 the forum state, and (2) the cause of action arises from that purposeful contact with the forum or
22 conduct targeting the forum.

1 **THAT** in determining whether specific personal jurisdiction exists, a court must consider
2 whether requiring the defendant to appear in the action would be reasonable.” *Id.*

3 **THAT** in this matter, Plaintiff alleges that “Defendant...resided in ...UK at the relevant
4 time herein...” *See Complaint*, Para. 2, on file herein; Therefore, Plaintiff admits that Defendant
5 was not residing in Nevada throughout the time relevant to the Defendant’s alleged actions.

6 **THAT** it would offend traditional notions of fair play and substantial justice to have the
7 Defendant be hailed in to a Nevada court.

8 **THAT** Defendant did not meet minimum contacts with Nevada to be brought into Court
9 in the State of Nevada.

10 **THAT** the Court heard arguments for failure to state a claim as well as arguments
11 regarding NRS 41.650, but Dismissal of the matter is warranted for failure of this Court to be
12 able to exercise personal jurisdiction over the Defendant.

13 Based on the foregoing, the Court **ORDERS** as follows:

14 **IT IS HEREBY ORDERED** that Defendant’s Motion to Dismiss is **GRANTED** and
15 this matter is **DISMISSED**.

16 **IT IS HEREBY FURTHER ORDERED** that any pending motions are **DENIED** as
17 moot and any pending hearings are **VACATED**.

Dated this 6th day of January, 2022

18 **IT IS SO ORDERED.**



19 Respectfully submitted by:

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

E99 DC0 E527 F124
David Barker
Approved as District Court Judge by:

Refused to Approve
Lisa Breslaw
7050 Shady Palms St.
Las Vegas, NV 89131
Plaintiff, Pro Se

----- Forwarded message -----

From: **Lisa Breslaw** <lisa.breslaw@alumni.unlv.edu>
Date: Tue, Jan 4, 2022 at 1:25 PM
Subject: Re: Order
To: Sagar Raich <sraich@raichattorneys.com>

Dear Mr. Raich:

I do not approve of this form and content, and I am not consenting to having the case dismissed with prejudice. I will consent to have the case transferred to Federal Court or reheard in the district court under its sitting judge, the Honorable Monica Trujillo, but if you will not consent to either option, I plan on filing an appeal with the NV Supreme Court.

Sincerely,
Lisa Breslaw

On Tue, Jan 4, 2022 at 12:42 PM Sagar Raich <sraich@raichattorneys.com> wrote:

Ms. Breslaw,

Please see the attached Order regarding today's hearing. Please advise if you approve of the form and content. If you do not approve, or if we do not hear from you by 12:00 pm January 7, 2022, we will submit the Order to the Court and indicate that you didn't approve and/or that we didn't hear from you.

Sincerely,

Sagar Raich, Esq. ^{**}
Managing Member
Raich Law PLLC

^{*}Ranked the Most Powerful Business Lawyer in Las Vegas, NV by MyVegas Magazine (Top 100 Lawyers Issue)

[^]Top 40 Under 40 Business Lawyers in NV by the Association of American Trial Lawyers

['] Licensed in Nevada and California

Southern Las Vegas Offices:
6785 S. Eastern Ave. Suite 5
Las Vegas, NV 89119

1 CSERV

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA
4

5
6 Lisa Breslaw, Plaintiff(s)

CASE NO: A-21-837948-C

7 vs.

DEPT. NO. Department 3

8 Peter Cooper, Defendant(s)
9

10 **AUTOMATED CERTIFICATE OF SERVICE**

11 This automated certificate of service was generated by the Eighth Judicial District
12 Court. The foregoing Order was served via the court's electronic eFile system to all
13 recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 1/6/2022

15 Sagar Raich

sraich@raichattorneys.com

16 Brian Schneider

bschneider@raichattorneys.com

17 General Information Raich Law

info@raichattorneys.com

18 Lisa Breslaw

lisa.breslaw@alumni.unlv.edu

Electronically Filed
1/10/2022 12:46 AM
Steven D. Grierson
CLERK OF THE COURT



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

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

Lisa Breslaw
Plaintiff

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

vs.

Peter Cooper
Defendant

MOTION TO VACATE ORDER OF DISMISSAL/ MOTION TO STAY ORDER OF DISMISSAL

Plaintiff LISA BRESLAW ("BRESLAW" or "PLAINTIFF") hereby files this motion to vacate the order of dismissal entered on Jan. 6, 2022. If, however, this honorable Court will not vacate the dismissal, Plaintiff asks that it stay the order of dismissal while her appeal to the NV Supreme Court is pending. 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 hearing on this matter.

Dated this January 10, 2022

/s/ Lisa Breslaw
Plaintiff, In Proper Person
7050 Shady Palms St.
Las Vegas, NV 89131
702-488-6989
lisadb1982@aol.com

Introduction

On Jan 4, 2022 at 9:00 am, Plaintiff LISA BRELAU ("Plaintiff"), pro so, and Defendant Peter Cooper ("Defendant"), through their attorney SAGAR RAISCH, ESQ. came for hearing before the Court on Defendant's Motion to Dismiss. Defendant, through their attorney, claimed that dismissal was proper due "lack of personal jurisdiction," "failure to state a claim," and "protected speech." Retired Judge David Barker (filling in for the honorable Moncia Trujillo) granted the dismissal based on, in his opinion, "lack of personal jurisdiction." On January 6, 2022, the order for the dismissal was entered (see Notice of Entry and Order), and on that same day of January 6, 2022, Plaintiff filed a notice of appeal and is in the process of appealing the order (of dismissal) to the Nevada Supreme Court. (See Notice of Appeal). For the reasons detailed below, Plaintiff is requesting to vacate the order of dismissal. If, however, the dismissal is not vacated, Plaintiff requests that the order to dismiss be "stayed" while the appeal is pending.

Memorandum and Points of Authority

1) Pursuant to NRCP 60(b)(1), the district court may "provide relief from a final judgement, order or proceeding" based on a showing of "mistake, inadvertance, surprise or excusable neglect"

There were several errors in the Order (of Dismissal) itself. First, on the first page of the Notice of Entry of Order, it says, "Please take notice that on Jan. 6, 2022 an order was filed in which the Court granted Plaintiff's Motion to Dismiss..." It was the Defendant who filed the motion to Dismiss. Plaintiff opposed that motion.

Next, it was not specified whether the Order (of Dismissal) was dismissed with or without Prejudice. (Plaintiff opposes it either way.)

Additionally, the order states "...the court heard arguments for failure to state a claim as well as arguments re: NRS 4.650, but Dismissal of the matter is warranted for failure of this Court to be able to exercise personal jurisdiction over the Defendant." (Order [of dismissal]) However, it is not specified as to whether the dismissal was granted in part or in full. For example, could Plaintiff and parties involved assume that Plaintiff succeeded in stating her claims and that Defendant's defamatory post did not qualify as "fair comment" under NRS 4.650? Alternatively, if the motion to dismiss was granted in full, it is not apparent by the language which focuses on lack of personal jurisdiction.

Finally, neither the Order nor Entry of Order specify what the order is for. The Order is titled *Order* an Entry of Order titled *Entry of Order*. Thus, an order which does not specify what the order is for should be vacated.

Next, pursuant to NRCP (60)(b) (3) the district court may provide relief from a final judgment or order for reasons of fraud (whether previously called intrinsic or extrinsic), misrepresentation, or misconduct by an opposing party;

Defendant's attorney in this matter has made egregiously and blatantly false statements throughout this case (in both their briefs and at the January 4th hearing). Specifically, he claimed that Plaintiff was unsure if she was suing the right person, that she has admitted to harassing UNLV employees and faculty, that she was unsure whether officials at UNLV and UNR saw the defamatory content, and that her argument for jurisdiction was merely that she was present in NV when she read the defamatory content. Plaintiff wanted to address these false statements in a sur-reply, but that hearing (set for Jan. 20th, 2022) was vacated at the Jan. 4th hearing when the case was dismissed. (See *Motion For Leave to File Sur-Reply* in the case file).

Furthermore, at the January 4th hearing (in front of Judge Barker and a [virtual] room of approx. 20 attorneys), Defendant's attorney accused Plaintiff of harassing Defendant and claimed that Defendant was asking Reddit "I'm being harassed by Plaintiff, what should I do?" That statement in itself was defamatory and blatantly untrue. Plaintiff (nervous during her first hearing [that wasn't ex parte] in her first lawsuit) was explaining that Defendant created a post where they specifically mentioned that Plaintiff was in Las Vegas (in the title) and then proceeded to share the libelous post and accuse her of stalking her UNLV professor in this same post. (See exhibit 13). (This was to support one of her arguments for personal jurisdiction.)

These are misrepresentations (and possibly even count as misconduct) from Defendant's counsel, and Plaintiff would like to point these falsehoods out to the court. This alone is reason to vacate /grant relief from the dismissal. Plaintiff had provided several additional exhibits to prove these statements false (i.e. evidence of Defendant's identity [even though they accepted service of the complaint] etc.), but the subsequent hearing for the sur-reply was vacated as was the motion to amend the complaint

Legal Arguments for the Order (of Dismissal) To Be Vacated

Calder

In addition to the above arguments, Plaintiff wishes to present the legal arguments for this honorable court to vacate the order of dismissal. As stated above, this case was dismissed based on "lack of personal jurisdiction." In her opposition (see *Opposition to Defendant's Motion to Dismiss*), Plaintiff cited *Calder vs. Jones*, arguing that under the Calder "effects test" Nevada would have personal and/or specific jurisdiction over Defendant. (see *Opposition to Motion to Dismiss* p. 3 and p.7 of *Motion for Leave to File Sur-Reply to Defendant's Motion to Dismiss*)

In *Walden vs. Fiore*, the Supreme Court explained that "they key to the Calder decision was "reputational-based 'effects' of the libel. (*E'Cassanova vs. Morrow*, 2021 U.S. Dist. LEXIS

33257) Under this ruling, NV would have jurisdiction over Defendant, because they knew (based on Plaintiff's posts) that she was planning on applying exclusively to graduate programs in NV (which is only UNLV and UNR). Graduate admissions, however, are not only based on academic qualifications but also largely on an applicant's reputation/character. Defendant certainly must have understood that accusing Plaintiff of stalking a (UNLV) professor, trying to force this professor to collaborate on a project, and then frivolously having administration demoted would damage her reputation in NV. (Again, NV was the only place she wanted to attend graduate school—which Defendant was aware of.) Thus, in addition to the reason's mentioned in her opposition (and sur-reply), Plaintiff feels *Calder* should have indeed been applied to her case.

Vangheluwe

In Plaintiff's Opposition, she also cited Vangheluwe (see Opposition to Motion to Dismiss), specifically regarding "geographical hashtags," in which social media contacts alone justify personal jurisdiction over a nonresident. Two points were brought up in this regard. First was the "725" in Plaintiff's Reddit username u/Gemini725. As mentioned in the opposition, Redditors (including Defendant) quickly figured out that Plaintiff was in Las Vegas, as was evidenced by multiple troll accounts appearing with Dr. Gallo's and other UNLV faculty members' names in them. The biggest clue that Plaintiff was in Las Vegas came from her username. At the hearing, the honorable Judge David Barker retorted that 702 is the Las Vegas area code, but as Plaintiff tried pointing out, 725 is also a NV/Las Vegas area code. (If one googles the number 725, for example, the first entry says "Area code 725 serves Las Vegas, NV and the surrounding areas." Plus, this was the first 3 digits/area code of Plaintiff's previous phone number.) Thus whether Defendant was behind those troll accounts or merely saw them, they knew Plaintiff was in Las Vegas when they made their libelous post, and also knew (based on Plaintiff's posts/comments) that she had planned to apply only to graduate programs in Las Vegas (UNLV and UNR). Furthermore, not only did Defendant know that Plaintiff wanted to attend graduate programs in NV but additionally knew that she didn't want to relocate for any reason (as they mocked her for).

Next, Defendant made a post 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 and what do I do?* In this same post, they shared the libelous post and accused Plaintiff of stalking her professor. They wrote, "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." (See exhibit 13) Based on the title of this post, by "women in the US," they clearly referred to Las Vegas, and as Plaintiff mentioned in the opposition, the sur-reply, and her motion to amend complaint, the corollary of Defendant's post was that UNLV allowed a faculty member to be stalked. Thus, by sharing the defamatory post in a post explicitly naming Las Vegas, and by sharing that Plaintiff didn't want to leave her city etc., they specifically and intentionally damaged her reputation in NV.

Again, enough information was provided in the defamatory post to identify Plaintiff by, and Debra Pieruschka, UNLV's Assistant Gen. Counsel told Plaintiff in a phone conversation that she had seen this defamatory post. (See Opposition to Defendant's motion to Dismiss, p. 3) Thus, Plaintiff is certain that she was identifiable and identified by the post. As she said in the Jan. 4th hearing, "That is not speculation or a hypothesis." (That Debra Pieruschka and other UNLV faculty/officials saw that defamatory content and understood it to be about Plaintiff.) (See Opposition to Motion to dismiss p. 3, Motion to File Sur-Reply, p7 and Leave to Amend Complaint p11).

The Vangheluwe case, which Plaintiff had cited in her opposition, was not even addressed at the Jan. 4th, 2022 hearing, however.

Nevada's Long-Arm Statute 14.065

Finally, Plaintiff believes that NV's long-arm statute (see Defendant's Motion to Dismiss p 3) indeed establishes personal and/or specific jurisdiction over Defendant. (NV long-arm statute 14.065 **Exercise of jurisdiction on any basis consistent with state and federal constitutions;**)

Neither the NV or US Constitution prohibits NV jurisdiction over Defendant in this matter.

Defendant's attorney also stated in his motion to Dismiss, citing *Arbella Mu. INs. Co. Vs. Dist. Ct.*, 134 P. 3d 710, 122, "specific personal jurisdiction exists when...1) defendant affirmatively directs conduct towards the forum state and 2) the cause of action arises from that purposeful contact with the forum or *conduct targeting the forum*." "Finally, ...a court must consider whether requiring the defendant to appear in the action would be reasonable."

As Plaintiff pointed out in her opposition motion (and throughout the case), Defendant did not libel Plaintiff over her private activities but accused her of stalking a UNLV professor, whom UNLV had a duty of care to. Thus, by alleging that Plaintiff was stalking this professor, they were alleging that UNLV allowed a faculty member's safety and well-being to be jeopardized. This is certainly conduct targeting the forum.

Effects Doctrine

As mentioned in Plaintiff's Opposition to Defendant's Motion to Dismiss, 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 domain." First, Defendant was not even a "foreign citizen." They were a US citizen (they retained US citizenship while in the UK and voted in US elections) posting their defamatory content and harassing Plaintiff on a Platform owned by a US company. And as stated above and throughout this case, this defamatory content was not only about Plaintiff but UNLV, a NV public institution (i.e. it alleges that they allowed an employee to be stalked). In addition to harming Plaintiff's reputation in NV, this post also deters both students and faculty from applying to study and/or work at UNLV, thereby financially harming the

institution. People, for example, do not wish to study or work at an institution that would jeopardize their safety or well-being in any way.

Furthermore, as Plaintiff pointed out at the Jan. 4th hearing on Defendant's motion to Dismiss, UNLV has an international reputation, with a substantial number of international students and faculty (i.e. their hospitality and tourism programs are world-renowned). Thus, even setting aside the fact that Defendant posted the defamatory content on a US platform, their defamatory post, even if it had only been seen in the UK (which was certainly not the case) still deterred potential students (and faculty) from attending UNLV.

There's also the fact that right after Plaintiff learned Defendant's identity (i.e. when she contacted the Police in April of 2020), Defendant left Sheffield. They were then living in Reading, which is 135 miles away from Sheffield and part of another county/jurisdiction. They did not even intend to stay in Reading, however, and soon stated their plans to move back to the US. Essentially, the only connection Defendant's defamatory post has to the UK is that Defendant wrote it when physically present there. Furthermore, Defendant was already in the US when Plaintiff sued them, and Plaintiff was within the statute of limitations for the torts she was suing for. Thus, at the time the suit commenced (again, within the statute of limitations), the UK no longer had jurisdiction over Defendant. Moreover, he moved multiple times in the US, from Boston to Colorado.

Reasonableness Factor in Establishing Personal Jurisdiction

Consistent with the reasonableness factor in establishing jurisdiction, it is certainly reasonable for a NV Court to establish jurisdiction over a Defendant when : A) Defendant intentionally harmed the reputation of a NV resident knowing that they only wanted to attend graduate school in NV, and knowing that reputation/character is a significant factor in grad school admissions. (Defendant themselves is pursuing an academic career.)

B) When the totality of the damage sustained by Plaintiff occurred exclusively in NV. Again, this includes both her personal and professional reputation (which are based in NV)being damaged, the financial loss of not being accepted to UNR (not to mention the long-term financial loss of being able to obtain her career goal because of Defendant's defamatory post), and the emotional damage caused by the fact that the people whom it would most embarrass her to see the defamatory post (and her being trolled etc), many whom did indeed see it (as confirmed by Debra Pieruschka), were NV residents and/or had substantial affiliation with NV (i.e. being connected to UNLV). She was also mocked in a novel published by a Las Vegas Author (See Exhibits 40-41 *Obsessed With My Professor, an Intense Lesbian Romance*)

C) When the alleged activity that she was accused of (stalking a UNLV professor) not only occurred in NV but implicated the negligence of a NV public institution (UNLV allowing Dr. Gallo to be stalked)

D) When the defamatory content was based exclusively on NV sources (Plaintiff's posts).

E) When Plaintiff has consistently been a Resident of NV throughout the entire time of the tort. (She has been a resident of NV for nearly 12 years and has not even traveled out of state since moving here) She is certainly not, however, arguing that jurisdiction is based on merely being physically present in NV at the time of reading the defamatory post about herself.

F) When the tort involved not a single defamatory post but extensive unwanted contact with Plaintiff, a NV resident

G) When Defendant could not face any punishment or accountability for their torts against Plaintiff in the UK because of her US residence. (See exhibits 9-10, police warning)

H) When Plaintiff furthermore has medical conditions (anxiety/fear of flying etc.) that would impose significant hardship for her to travel out of state/country to sue Defendant, and when Defendant is no longer even residing in the jurisdiction that the tort began in (when the first published their libelous post).

MOTION TO STAY ORDER OF DISMISSAL

In the case that this honorable court will not vacate the Order (of Dismissal), Plaintiff asks that it be "stayed" pending appeal by the NV Supreme Court.

Memorandum and Points of Authority

According to Nevada Rules of Appellate Procedure (NRAP 8 (1)(a)) "A party must ordinarily move first in the district court for the following relief: (A) a stay of the judgment or order of proceedings in a district court pending appeal or resolution of a petition to the Supreme Court or Court of Appeals for an extraordinary writ."

CONCLUSION:

On Jan. 6, 2022, Defendant's Motion to Dismiss was granted. However, there were several errors in both the Order and Order of Entry that would make dismissal improper. Furthermore, Defendant's Attorney, throughout this case and pertaining to this matter, has engaged in misconduct (in the form of stating deliberate falsehoods and misrepresentations, some in themselves libelous) which further cements the need to vacate the dismissal. Moreover, dismissal is improper as shown in the laws, statutes, and cases, cited above. All of these sources were cited in Plaintiff's opposition; these are not new sources added to reargue the case. Plaintiff did, however, move the court to amend her complaint to correct deficiencies cited by the Defendant, but that motion was vacated in the "Order" (of Dismissal). Again, Plaintiff

(pro-se) should have the opportunity to correct any deficiencies in the initial complaint. (Including those related to establishing jurisdiction). However, based on the order, it is unclear whether the dismissal was also based on "failure to state a claim," and "protected speech." It seems that it was not, but in the case that it was, Plaintiff should have the opportunity to amend the complaint to correct them. For these reasons, and based on 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 hearing on this matter, the **ORDER (OF DISMISSAL) SHOULD BE VACATED**. If, however, the court will not vacate the dismissal, Defendant's Motion to Stay Order (Of Dismissal) should be **granted pending appeal to the NV Supreme Court**.

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

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2022, I electronically transmitted the above PLAINTIFF'S MOTION TO VACATE ORDER (OF DISMISSAL) and ORDER TO STAY ORDER OF DISMISSAL 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.
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

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

DECLARATION.

STATE OF NV)

)ss.

COUNTY OF CLARK)

Declarant, LISA BRESLAW, swears and affirms under penalty of perjury, that above stated facts in the above-presented motions are true and correct.

Dated this 10th of January, 2022

/s/Lisa Breslaw

Plaintiff, In Proper Person

7050 Shady Palms St.

Las Vegas, NV 89131

702-488-6989

lisa.breslaw@alumni.unlv.edu

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**DISTRICT COURT
CLARK COUNTY, NEVADA

Electronically Filed
1/10/2022 7:18 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 Motion to Vacate Order of Dismissal/Motion to Stay Order of Dismissal in the above-entitled matter is set for hearing as follows:

Date: February 22, 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/ Ondina Amos
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/ Ondina Amos
Deputy Clerk of the Court



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6 **IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE**
7 **STATE OF NEVADA IN AND FOR**
8 **THE COUNTY OF CLARK**
9

10 LISA BRESLAW,

11 Plaintiff(s),

12 vs.

13 PETER COOPER,

14 Defendant(s),
15

Case No: A-21-837948-C

Dept No: III

16
17 **CASE APPEAL STATEMENT**
18

19 1. Appellant(s): Lisa Breslaw

20 2. Judge: David Barker

21 3. Appellant(s): Lisa Breslaw

22 Counsel:

23 Lisa Breslaw
24 7050 Shady Palms St.
Las Vegas, NV 89131

25 4. Respondent (s): Peter Cooper

26 Counsel:

27 Sagar Raich, Esq.
28 6785 S. Eastern Ave., Ste 5
Las Vegas, NV 89119

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- 5. Appellant(s)'s Attorney Licensed in Nevada: N/A
Permission Granted: N/A
- Respondent(s)'s Attorney Licensed in Nevada: Yes
Permission Granted: N/A
- 6. Has Appellant Ever Been Represented by Appointed Counsel In District Court: No
- 7. Appellant Represented by Appointed Counsel On Appeal: N/A
- 8. Appellant Granted Leave to Proceed in Forma Pauperis**: N/A
***Expires 1 year from date filed*
Appellant Filed Application to Proceed in Forma Pauperis: No
Date Application(s) filed: N/A
- 9. Date Commenced in District Court: July 15, 2021
- 10. Brief Description of the Nature of the Action: TORT - Intentional Misconduct
Type of Judgment or Order Being Appealed: Dismissal
- 11. Previous Appeal: No
Supreme Court Docket Number(s): N/A
- 12. Child Custody or Visitation: N/A
- 13. Possibility of Settlement: Unknown

Dated This 10 day of January 2022.

Steven D. Grierson, Clerk of the Court

/s/ Amanda Hampton
Amanda Hampton, Deputy Clerk
200 Lewis Ave
PO Box 551601
Las Vegas, Nevada 89155-1601
(702) 671-0512

cc: Lisa Breslaw



1 **OPPM**

Sagar Raich, ESQ.

2 NEVADA BAR NO. 13229

6785 S. Eastern Ave. Ste. 5

3 Las Vegas, NV 89119

Telephone: (702) 758-4240

4 Facsimile: (702) 998-6930

Email: sraich@raichattorneys.com

5 Attorney for Defendant, Peter Cooper

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

8 Case No.: A-21-837948-C

Dept. No.: III

9 LISA BRESLAW;

Plaintiff(s),

10 vs.

11 PETER COOPER,

12 Defendant(s).

**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/VEEXATIONOUS FILINGS
AND FOR AN INJUNCTION
PREVENTING PLAINTIFF FROM
FILING FRIVOLOUS FILINGS**

17 Defendant PETER COOPER ("COOPER" or "Defendant"), by and through Sagar Raich,
18 Esq. of Raich Law PLLC, hereby files this Opposition to Motion to Vacate Order of
19 Dismissal/Motion to Stay Order of Dismissal and Countermotion for Attorneys' Fees Required
20 to Respond to Plaintiff's Frivolous and Vexationous Filings and an injunction preventing the
21 Plaintiff from additional frivolous filings.

22 This opposition and countermotion are made and based upon the pleadings and papers on
23 file, the attached memorandum of points and authorities, and any oral argument that the Court
24

1 may entertain at the time of the Hearing on this matter.

2 Dated this 24th day of January, 2022. /s/ Sagar Raich

3 SAGAR RAICH
4 NEVADA BAR 13229
5 RAICH LAW PLLC
6 6785 S. Eastern Ave., Suite 5
7 Las Vegas, NV 89119
8 Attorney for Defendant, Peter Cooper

9 **MEMORANDUM OF POINTS AND AUTHORITIES**

10 **I. INTRODUCTION**

11 Plaintiff, in what is now a pattern, continues to file frivolous and vexatious motions,
12 forcing the Defendant to incur costs for no reason other than harassment. The Court, having
13 reviewed all the filings, having heard from Plaintiff (individually) and Defendant (via counsel) in
14 Court, and having asked questions to the Plaintiff in Court, ruled in favor of the Defendant in
15 dismissing the matter for lack of personal jurisdiction. Plaintiff, not happy with the decision, is
16 now attempting to vacate the Order on the basis of NRCP Rule 60, without meeting the rigorous
17 standard of the same. Defendant, by and through the opposition herein, demonstrates the
18 baselessness of Plaintiff's motion.

19 The basis of Plaintiff's motion is the fact that counsel for Defendant pointed out to the
20 Court of the facts Plaintiff admitted – that the Defendant was not in Nevada – or even the United
21 States – throughout the timeframe applicable to the Complaint. The Plaintiff has also filed (prior
22 to filing her motion), the Notice of Appeal. As such, the Plaintiff's current motion is frivolous,
23 vexatious, and in bad faith and is meant solely to cause Defendant to incur attorneys' fees. Due
24 to the multitudes of filings by the Plaintiff to date, due to her admittance of the facts as stated in

1 the prior issued Order of this Court, and due to the frivolous nature of Plaintiff's current motion,
2 Defendant requests that the Court grant the Defendant attorneys' fees in having to respond to the
3 motion via this Opposition and attending any hearing relevant thereto and that the Court prevent
4 the Plaintiff from continuing to file baseless filings requiring Defendant to respond and incur
5 attorneys' fees for the same.

6 **II. APPLICABLE STANDARD**

7 *A. Standard regarding Vacating Judgments*

8
9 Under NRCP 60(b), "the court may relieve a party or its legal representative from a final
10 judgment, order, or proceeding for [certain] reasons" which the Plaintiff relies on. Plaintiff
11 specifically is relying on NRCP 60(b)(1) and 60(b)(3) which provide that the court may relieve a
12 party from the judgment for "mistake, inadvertence, surprise, or excusable neglect" (NRCP
13 60(b)(1)) or "fraud (whether previously called intrinsic or extrinsic), misrepresentation, or
14 misconduct by an opposing party" (NRCP 60(b)(3)).

15 "Motions under Rule 60(b) are addressed to the sound discretion of the trial court and the
16 exercise of discretion by the trial court in granting or denying such motions is not to be disturbed
17 on appeal absent an **abuse of discretion**" (emphasis added). *Heard v. Fisher's & Cobb Sales &*
18 *Distribs.*, 88 Nev. 566, 568, 502 P.2d 104, 105 (1972) citing *Ogle v. Miller*, 87 Nev. 573, 491
19 P.2d 40 (1971); and citing *Minton v. Roliff*, 86 Nev. 478, 471 P.2d 209 (1970); and citing *Lentz*
20 *v. Boles*, 84 Nev. 197, 438 P.2d 254 (1968); and citing *Hotel Last Frontier Corp. v. Frontier*
21 *Properties, Inc.*, 79 Nev. 150, 380 P.2d 293 (1963); and citing *Blakeney v. Fremont Hotel Inc.*,
22 77 Nev. 191, 360 P.2d 1039 (1961); and citing *Bryant v. Gibbs*, 69 Nev. 167, 243 P.2d 1050
23 (1952).

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1 1217 (2014) citing *Marble v. Wright (In re Humboldt River Sys.)*, 77 Nev. 244, 248, 362 P.2d
2 265, 267 (1961). An error in a party name may be a "clerical error" where it is so diminutive that
3 a defendant "could not possibly have been misled." See *Reno Elec. Works v. U.S. Fid. & Guar.*
4 *Co.*, 43 Nev. 191, 194, 183 P. 386, 387 (1919).

5
6 In this matter, it is clear that the motion to dismiss was filed by the Defendant – Plaintiff
7 admits that "It was the Defendant who filed the motion to Dismiss. Plaintiff opposed the
8 motion." See *Motion to Vacate*, pg. 2, on file herein. Thus, the error in the party name is a
9 "clerical error" where the Plaintiff "could not possibly have been misled" and as such does NOT
10 justify vacating of the Court's dismissal of the Plaintiff's Complaint.

11 Plaintiff thereafter relies on NRCP 60(b)(3) to state that "Defendant's attorney ... has
12 made ... false statements" and that "Defendant's attorney...claimed that Defendant asked Reddit
13 'I'm being harassed by Plaintiff, what should I do?'" *Id* at pg. 2. Essentially, Plaintiff attempts
14 to state that the Defendant's quoting from Plaintiff's own filings and pleadings are
15 misrepresentations because they don't help her case and seeks vacating of the order on such a
16 basis under NRCP 60(b)(3). What Plaintiff failed to state truthfully in her motion was the fact
17 that the presiding judge asked Plaintiff questions regarding the Defendant's location and Plaintiff
18 admitted that Defendant was in the United Kingdom throughout the time frame complained of in
19 the Complaint. As such, the Court dismissed the matter based on the filings, pleadings, oral
20 arguments, and questions that the Plaintiff herself answered in open court, not on grounds of
21 fraud, misrepresentation, or misconduct.

1 Finally, it is clear that “motions under Rule 60(b) are addressed to the sound discretion of
2 the trial court and the exercise of discretion by the trial court in granting or denying such motions
3 is not to be disturbed on appeal absent an **abuse of discretion**” (emphasis added). *Heard v.*
4 *Fisher's & Cobb Sales & Distribs.*, 88 Nev. 566, 568, 502 P.2d 104, 105 (1972). In this matter,
5 the court did not abuse its discretion and the Plaintiff’s motion to vacate does not mention any
6 factors, facts, or any claims regarding the same. As such, the motion to vacate should be
7 dismissed.

8 **III. ALTERNATIVE REQUEST FOR STAY IS IRRELEVANT**

9
10 Plaintiff, in the alternative, requests the court to stay the Order dismissing the case
11 against the Plaintiff. Such a request is not relevant given the nature of the judgment in this matter
12 – dismissal for lack of personal jurisdiction.

13 Under NRAP 8(a)(1):

14
15 A party must ordinarily move first in the district court for the following relief:

16 (A) a stay of the judgment or order of, or proceedings in, a district court pending appeal
17 or resolution of a petition to the Supreme Court or Court of Appeals for an extraordinary writ;

18 (B) approval of a supersedeas bond; or

19 (C) an order suspending, modifying, restoring or granting an injunction while an appeal
or original writ petition is pending.

20 In this matter, there is no stay required and/or otherwise appropriate as there is no
21 judgment against the Plaintiff that the Order for dismissal provides. Additionally, there is no
22 bond and there is no injunction pending appeal. As such, the request for stay should be denied as
23 moot.

COUNTERMOTON

**IV. PLAINTIFF'S FRIVOLOUS MOTION WAS FILED TO HARASS, ESPECIALLY
GIVEN THAT PLAINTIFF ALREADY FILED A NOTICE TO APPEAL BEFORE SHE
FILED THE PRESENT MOTION**

The order and the notice of entry of order dismissing the matter were filed on January 6, 2022. Plaintiff filed her notice of appeal on January 6, 2022 as well. Then, **after** filing her notice of appeal, Plaintiff filed her frivolous motion on January 10, 2022 asking the Court to vacate the order dismissing the case. *See* docket.

In this case, Plaintiff has repeatedly attempted to have continued bites at the apple and attempt to re-argue her positions, has filed more than 60-70 bogus filings, has cited to non-binding or inapplicable law, and has done so with the intent of having Defendant incur attorneys' fees. Due to the improper conduct of the Plaintiff, Defendant requests the granting of attorneys' fees.

"The Court may make an allowance of attorney's fees to a prevailing party ... when the Court finds that the claim...of the opposing party was brought or maintained without reasonable ground or to harass the prevailing party." Nev. Rev. Stat. § 18.010(2). "A claim is frivolous if it is utterly lacking in legal merit..." *U.S. ex rel. J. Cooper & Associates, Inc. v. Bernard Hodes Group, Inc.*, 422 F. Supp. 2d 225, 238 (D.D.C. 2006). Additionally, a frivolous claim is the equivalent of a groundless claim. *See United States v. Capener*, 590 F.3d 1058, 1066 (9th Cir. 2010). Under Nevada law, a claim is frivolous if it is "not well grounded in fact and warranted either by existing law or by a good faith argument for the extension, modification, or reversal or

1 existing law.” *Simonian v. U. and Community College System of Nevada*, 122 Nev. 187, 196, 128
2 P.3d 1057, 1063 (2006).

3 In this matter, the Court specifically asked Plaintiff questions in open court – Plaintiff
4 answered them (that Defendant didn’t live in the United States), and filed the motion to vacate
5 simply because she did not like the result – the Court ruling properly that a Defendant not living
6 in the United States through the duration of the allegations in the Complaint, could not lead to
7 the Court exercising personal jurisdiction over the Defendant. Plaintiff therefore filed a
8 groundless claim via her motion, thereby justifying the grant of attorneys’ fees with the amount
9 of attorneys’ fees based on affidavit of Defendant’s counsel to be submitted after the granting of
10 this Countermotion.

11 **V. DEFENDANT REQUESTS THAT PLAINTIFF BE PREVENTED FROM ANY**
12 **ADDITIONAL FILINGS DUE THE VEXATIOUS NATURE OF PLAINTIFF’S FILINGS**

13 Defendant requests that this Court prevent the Plaintiff from being allowed to undertake
14 bogus motions and filings, simply to run up costs for the Defendant.

15 “A ‘vexatious litigant’ is one ‘who repeatedly files frivolous lawsuits’ ... [and] in order
16 to deter such conduct, [the Supreme Court] has approved of the use of sanctions, including
17 limiting by order a vexatious litigant's right to access the courts. *Peck v. Crouser*, 129 Nev. 120,
18 122-23, 295 P.3d 586, 587 (2013) quoting *Jordan v. State, Dep’t of Motor Vehicles*, 121 Nev. 44,
19 58-60, 110 P.3d 30, 41-42 (2005), abrogated on other grounds by *Buzz Stew, LLC v. City of N.*
20 *Las Vegas*, 124 Nev. 224, 228 n.6, [*123] 181 P.3d 670, 672 n.6 (2008).

21 “Restrictions imposed by vexatious litigant orders may include prohibiting the litigant
22 from filing future actions against a particular party or barring the litigant from filing any new
23 action without first demonstrating to the court that the proposed case is not frivolous.” *Id.*

1 In this case, the Plaintiff has kept filing motion after motion, exhibit after exhibit, and
2 filing after filing for the sole purpose of harassing the Defendant and to have the Defendant incur
3 unnecessary attorneys' fees. Plaintiff's motions are consistently not supported by law and when
4 they are supported by some law are supported by non-binding law. Plaintiff blames everyone in
5 the case – Defendant, counsel, the Court, Reddit, unknown individuals online, UNLV, etc. -
6 except herself, for her problems.

7 While Defendant, Defendant's counsel, and the Court may have had sympathy for
8 Plaintiff based on her allegations, Plaintiff's repeated use of the judicial system to harass and vex
9 the Defendant justifies Court intervention to prevent exactly the type of harassing filings and
10 motions that not just justify granting of attorneys' fees, but also allow for this Court to prevent
11 the Plaintiff from undertaking any additional filings in this matter under the *Peck* standard cited
12 herein.

13 Based on the foregoing, Defendant requests that the Court not allow Plaintiff to be
14 allowed to file any additional filings in this matter.

15 **VI. CONCLUSION**

16 Plaintiff's frivolous motion asks the Court to vacate the judgment on grounds of mistake
17 and fraud, when both are not present. Additionally, Plaintiff fails to show how the court abused
18 its discretion in granting the dismissal. As such, the Plaintiff's frivolous motion should be
19 denied.

20 Furthermore, the request to stay the order is moot and should therefore be denied as well.

21 Due to the Plaintiff's repeated frivolous filings, Defendant requests attorneys' fees –
22 based on affidavit of counsel to be submitted should the counter motion be granted.

Additionally, Defendant requests an Order preventing Plaintiff from filing frivolous filings of the sort that she has repeatedly been filing in this matter.

Dated this 24th day of January, 2022.

/s/ Sagar Raich
SAGAR RAICH, ESQ.
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 RTRAN

DISTRICT COURT

2
3 CLARK COUNTY, NEVADA

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5
6 LISA D. BRESLAW,

7 Plaintiff,

8 vs.

9 PETER COOPER,

10 Defendant.

)
) CASE NO. A-21-837948-C

)
) DEPT. NO. III

)
) **Transcript of Proceedings**

11
12 BEFORE THE HONORABLE DAVID BARKER, DISTRICT COURT JUDGE

13 **DEFENDANT'S MOTION TO DISMISS**

14 TUESDAY, JANUARY 4, 2022

15 **APPEARANCES:**

16 For the Plaintiff: PRO SE
17 [Via Video Conference]

18 For the Defendants: SAGAR R. RAICH, ESQ.
19 [Via Video Conference]

20
21 RECORDED BY: REBECA GOMEZ, DISTRICT COURT
22 TRANSCRIBED BY: KRISTEN LUNKWITZ

23
24 Proceedings recorded by audio-visual recording; transcript
25 produced by transcription service.

1 TUESDAY, JANUARY 4, 2022, AT 9:29 A.M.

2

3 THE COURT: Page 1 is A837948, *Breslaw versus*
4 *Cooper*. Do I have counsel -- looks like pro se counsel or
5 a pro se plaintiff. Can you state appearance, please?

6 UNIDENTIFIED SPEAKER: Your Honor, this is
7 [indiscernible]. I believe this is the Robin Cooper case.
8 I am the attorney for the -- she's supposed to be the
9 plaintiff.

10 THE COURT: I have pro se plaintiff, Lisa Breslaw.
11 I -- whoever is speaking, I believe you just identified
12 yourself as counsel for defendant. Is that correct?

13 UNIDENTIFIED SPEAKER: I'm for the Robin Cooper
14 case. Let me just --

15 MR. RAICH: Your Honor, this is -- I think counsel
16 is mistaken. This is the *Breslaw v. Cooper* matter, Peter
17 Cooper. So, --

18 UNIDENTIFIED SPEAKER: Oh, my apologies.

19 THE COURT: So, *Lisa Breslaw versus Peter Cooper*.
20 Do I have Lisa Breslaw present --

21 MS. BRESLAW: Here.

22 THE COURT: -- with --

23 MS. BRESLAW: Yes. Yes. I am here.

24 THE COURT: All right. Do I have counsel for the
25 defendant, Peter Cooper, present remotely?

1 MR. RAICH: Yes. Good morning, Your Honor. Sagar
2 Raich on behalf of Peter Cooper.

3 THE COURT: Thank you. This is time set
4 Defendant's Motion to Dismiss under 12(b)(2), 12(b)(6),
5 under Rule 12. Counsel, you have the floor. I've reviewed
6 the Motions, the -- and Opposition. Let's build a record
7 here. You have the floor.

8 MR. RAICH: Thank you, Your Honor.

9 As Your Honor read from the facts, I'll just
10 briefly state those. This case involves a fact pattern
11 where the plaintiff, you know, was a UNLV student, had a
12 lot of issues with UNLV and its professors, to a point --
13 these issues blew up to a point where UNLV sent plaintiff a
14 cease and desist to stop harassing the professors.

15 Plaintiff, thereafter, turned to an online
16 platform called Reddit. Reddit is a pretty large platform.
17 I believe it's the seventh most visited site in the U.S.
18 Got half a billion users. It's a massive website that
19 people can just post content on. And what plaintiff did,
20 after she went through these issues at UNLV, and this is
21 based on the plaintiff's own allegations in the Complaint.
22 She went online, posted on Reddit all of the issues that
23 happened. Thereafter, defendant allegedly saw those posts
24 that she made, the plaintiff made, and reposted those on
25 Reddit.

1 Now, the plaintiff, thereafter, removed those
2 posts and applied for graduate entrance to UNR. Now, the
3 plaintiff believes that the admissions committee at UNR
4 reviewed the Reddit post that the defendant reposted and,
5 based on that basis, she didn't get into UNR. And, you
6 know, there -- those are basically the factual allegations.
7 And that -- that's led to the plaintiff filing this
8 Complaint, alleging two causes of action against the
9 defendant. The first one is libel per se, so defamation.
10 And the second is intentional infliction of emotional
11 distress.

12 Now, the defendant has filed the Motion to
13 Dismiss, which, you know, generally, Motions to Dismiss are
14 disfavored. Defendant understands that. In a case where
15 the plaintiff is representing herself, that surely might be
16 more so the case. However, in this case, there's a lot of
17 ground. There's a lot of evidence that's presented in the
18 plaintiff's own Complaint, a lot of allegations made, that
19 justify dismissal. And there are four main reasons, Your
20 Honor. And I'll go through each one, one by one.

21 The first one, which is actually a dispositive
22 reason, is that the Complaint should be dismissed for the
23 defendant to not be under the personal jurisdiction of this
24 Court. The plaintiff alleges -- and, again, everything in
25 the Complaint must be assumed to be true, and the plaintiff

1 alleges in the Complaint that the defendant, when he
2 reposted the plaintiff's posts, and when he and the
3 plaintiff had a tiff online, that the plaintiff was in the
4 U.S. but that the defendant was in the U.K. So, the
5 plaintiff admits that the defendant was not in Nevada and
6 that he really did have minimum contacts with Nevada.

7 The plaintiff then also admits that she doesn't
8 even know whether it's the defendant in this matter who
9 actually engaged in confrontation with her online. She
10 says that she sent out subpoenas to Reddit. She doesn't
11 even know whether it's the defendant. So, she's suing a
12 person in Nevada court, not knowing whether that person was
13 the one who she engaged in the online debate with. And,
14 admitting that even if it was him, that he was in the
15 United Kingdom.

16 Now, that is certainly way above and beyond the
17 traditional personal jurisdiction guidelines that Nevada
18 follows, fair play, substantial justice would certainly be
19 violated to try to have somebody drug into court when the
20 plaintiff posts something online, has a tiff with the
21 defendant, who doesn't even live in the country, let alone
22 the state.

23 All right. The defendant's -- the plaintiff's
24 Opposition, rather, mentioned the *Calder* standard. Pretty
25 famous standard. I'm not going to go into the case too

1 much. I'm sure Your Honor has heard it a million times,
2 but this is not a *Calder* type of case. *Calder* was where a
3 Florida magazine, who had a bunch of subscribers, the most
4 -- millions of subscribers in California, had an article
5 about a celebrity and a celebrity said: Oh, I was defamed.
6 And the Court held that case can go forward. This is not
7 the *Calder* case. This is a UNLV grad student, essentially
8 suing an undergraduate kid who lived in the U.K. at the
9 time these alleged posts were made.

10 So, the personal jurisdiction issue, Your Honor,
11 is dispositive in that under 12(b)(2), we -- it's pretty
12 clear that Nevada wouldn't have jurisdiction under the
13 defendant. However, given that the plaintiff is
14 representing herself, the defendant has got to step beyond
15 and, even assuming personal jurisdiction, the plaintiff
16 still has failed to state a claim. And those -- that's a
17 two-sided analysis. So, the first one, the libel per se
18 claim, requires that there be false and defamatory
19 statements, that are unprivileged, that somehow indicate
20 that the defendant would be at fault for posting, and that
21 the plaintiff suffered actual or personal damages.

22 The liable claim fails, Your Honor, because the
23 plaintiff admits that she was the one who made these posts
24 online. How can I go and say I'm Joe Schmoe, somebody
25 looks at me and says, oh, you're saying you're Joe Schmoe,

1 and me saying, oh, I'm going to sue you, you just called me
2 Joe Schmoe. That's essentially what's happening here. The
3 plaintiff's suing the defendant for repeating what she
4 said. If the plaintiff didn't want half a billion people
5 in the world to know her problems, she shouldn't have
6 posted them online.

7 And I'm not discounting her problems. I'm sure
8 that she is frustrated by not getting into grad school.
9 I'm sure it must be frustrating to have education and not
10 be able to take it further. I get that. But the defendant
11 is not the right party to sue when the plaintiff herself
12 goes and makes posts online, because the defendant wouldn't
13 know those posts are untrue. The defendant wouldn't be
14 able to distinguish whether the plaintiff is lying or not
15 and then be expected to be haled into court by a plaintiff
16 for defamation, for repeating her own statements.

17 Finally, the damages here are very, very thin,
18 Your Honor, thinnest that they can be because the plaintiff
19 assumes that it is the defendant's reposting that UNR saw,
20 and that because of those reposting that UNR saw, UNR
21 didn't let her in. So, there are a lot of possibility and
22 hypotheses that are presented in the Complaint, which is --
23 even though Nevada is a notice-pleading state, there's
24 still a notice-pleading requirement. And to say that the
25 damages may have occurred because of a defendant's conduct,

1 allege -- admittedly by the plaintiff in her Complaint,
2 would require dismissal, at least for the libel claim
3 regarding failing to prove a claim.

4 The second claim that the plaintiff has made in
5 this matter, Your Honor, is the intentional infliction of
6 emotional distress. That requires that the defendant's
7 extreme and outrageous conduct and is saying things and
8 doing things that would be beyond the norm for a reasonable
9 person to view. In this case, Your Honor, repeating what
10 the plaintiff has said is not extreme or outrageous. If
11 the plaintiff was so distraught with the information that
12 was posted online, she shouldn't have posted it online in
13 the first place.

14 She then engaged in multiple discussions with
15 multiple people, all of whom she believes to be the
16 defendant in this case, and who she's admitted she doesn't
17 even know whether it is the defendant or not. So, --

18 MS. BRESLAW: That's not true. That's not true.

19 MR. RAICH: Assuming -- Ms. Breslaw, I'll give you
20 a chance to speak right after me. I won't interrupt you as
21 well.

22 So, assuming, Your Honor, that everything in the
23 Complaint is true, the Complaint fails to state a claim for
24 both libel and intentional infliction of emotional
25 distress.

1 Now, again, because the defendant -- or the
2 plaintiff is representing herself, we want to give the
3 Court more than enough reason to dismiss this matter. And,
4 so, while the personal jurisdiction issue is dispositive,
5 while the failure to state a claim is dispositive, the
6 defendant has gone one step further and analyzed NRS
7 41.650, which specifically provides that if a communication
8 is made in good faith on an issue of public concern, that
9 communication is a protected communication.

10 In this case, Your Honor, the plaintiff's
11 Complaint, as well as a slew of filings that were the
12 plaintiff's and made after, admit that the allegations that
13 are made, that the issues between the plaintiff and the
14 defendant that were discussed online, were all regarding
15 UNLV, UNLV professors, UNLV policies. And, given that UNLV
16 is a public institution, and the plaintiff herself goes
17 into how public UNLV is as an institution and -- it
18 justifies a dismissal because, under NRS 41.560, these are
19 issues of public concern. The fact that plaintiff
20 thereafter posted them on Reddit, which is a massive online
21 platform, she took an issue of public concern and put it in
22 another public domain. And, so, this would be a protected
23 speech under NRS 41.650.

24 So, I don't want to take up too much of the
25 Court's time. I know Your Honor's read this. I'll just

1 sum everything up really quickly. The plaintiff is
2 alleging that she believes it's the defendant that talked
3 to her online, that reposted her post. She doesn't know
4 for sure. But what she does know for sure is, regardless,
5 whatever the defendant did post, he posted when he was in
6 the U.K. So, personal jurisdiction issue is resolved.

7 The second is that the defendant -- the plaintiff
8 has failed to state a claim for libel and intentional
9 infliction of emotional distress because the plaintiff
10 herself made these posts that the defendant reposted.
11 Again, based on plaintiff's allegations in the Complaint.

12 And, finally, the plaintiff has failed to show why
13 the reposting by the defendant wouldn't be protected speech
14 under NRS 41.650 because the defendant has shown through
15 the pleadings that this is a matter of public concern as a
16 matter of law.

17 Finally, Your Honor, this is quick note. The
18 plaintiff -- I'm not sure if Your Honor's seen the docket.
19 Plaintiff has filed Motion after Motion, Exhibit after
20 Exhibit. There's been over 50, 60, 70 filings that the
21 plaintiff has made so far. Plaintiff is a vexatious
22 litigant in this matter, Your Honor. After the Motion to
23 Dismiss was filed, an Opposition was filed, the plaintiff -
24 - the defendant replied to that Opposition and then the
25 plaintiff just kept filing Motions for Sur-Reply, and

1 Motions, and Exhibits, and Erratas, and she's drug this
2 matter out a lot and it's cost the defendant a lot of money
3 so far. The defendant is a college student. Plaintiff
4 admits and knows that he's just a college student. But the
5 plaintiff is pushing this, and pushing this, and pushing
6 this, and taking her frustrations out on the defendant.
7 Now, again, like I said, I understand the frustration. The
8 defendant is simply not the right party to take those
9 frustrations out and to drag through court for reposting
10 what the plaintiff herself posted.

11 So, therefore, Your Honor, if Your Honor has any
12 questions, I would like to answer those at this point.
13 But, with that, I'll rest and reserve some time for reply.

14 THE COURT: Opposition. Ms. Breslaw, you have the
15 floor.

16 MS. BRESLAW: Yes. Yes. Okay. First, I'd like
17 to address I am absolutely 100 percent sure that my
18 defendant is Peter Cooper. There was never any doubt that
19 this was him. Even -- I submit a lot of exhibits with
20 evidence that I've had private investigators verify his
21 identity. He shared pictures of himself, for example, on
22 Reddit. I had those matched. He posted his name on
23 Reddit, by the way. He -- a private investigator was able
24 to match those pictures to pictures of him mentioned by
25 name with his family. We found a family social media. My

1 process server actually contacted his grandfather. There's
2 -- I mean, a lot of this is in the exhibits. There's no
3 doubt that this is Peter Cooper.

4 What I said there was certain troll accounts. He
5 harassed me from multiple accounts. On Reddit, there were,
6 like, these troll accounts mentioning UNLV faculty by name.
7 The professor -- there were people pretending to be the
8 professor I fell out with. There were -- and I suspected
9 those accounts were him [indiscernible] as well. But, at a
10 minimum, there were two accounts that I am certain were
11 him. There was, like I said, never-ending doubt. He's
12 admitted this was him. He was contacted by the police in
13 April 2020, warned to stop harassing me, and then he
14 continued. So, again, there is no uncertainty about his
15 identity.

16 For good measure, I --

17 THE COURT: Ms. Breslaw, stop for a second. Stop
18 for a second.

19 MS. BRESLAW: Sure. Sure.

20 THE COURT: If I understand the briefly correctly,
21 the police you're talking about are in the U.K. Is that
22 correct?

23 MS. BRESLAW: Yes. I contacted the U.S. police as
24 well but they told me they don't really -- social media
25 harassment here is a civil matter, so they really would not

1 address it. I e-mailed the police in the U.K. --

2 THE COURT: Ms. Breslaw, address the 12(b)(2),

3 personal jurisdiction --

4 MS. BRESLAW: Okay.

5 THE COURT: -- issues that defense counsel has

6 indicated. If Mr. Cooper is --

7 MS. BRESLAW: Okay.

8 THE COURT: -- a resident of or citizen from the

9 United Kingdom, and residing in the United Kingdom, how

10 does a State Court in Nevada have jurisdiction over him?

11 MS. BRESLAW: Well, first, he was a U.S. citizen,

12 but I read there's something called the effects doctrine,

13 where if someone, like, -- interferes with, like, state --

14 I'm sorry. Like, I -- if I'm understanding correct, like,

15 if they interfere with, like, state activities, they can be

16 held accountable in the foreign country.

17 THE COURT: Okay.

18 MS. BRESLAW: Effects -- not the effects doctrine.

19 The -- I'm sorry. I have it written down here.

20 [Pause in proceedings]

21 MS. BRESLAW: It's in my Motion -- it's in my

22 Opposition Motion.

23 THE COURT: Okay.

24 MS. BRESLAW: Hold on. All right.

25 [Pause in proceedings]

1 THE COURT: On -- just so we're moving forward
2 here, you're -- I believe you're referring --

3 MS. BRESLAW: Okay. Yeah. It's --

4 THE COURT: -- page -- or paragraph 1 of your
5 Opposition where you talk about the 51st conference, the 369
6 -- the Tokyo Report under the International Law --

7 MS. BRESLAW: Yeah, yeah.

8 THE COURT: -- Association Report. That's --

9 MS. BRESLAW: Yes.

10 THE COURT: I've got to be honest with you, Ms.
11 Breslaw. That's not real powerful. I'm a State Court
12 Judge. Right? I look for personal jurisdiction. I look
13 for the ability for you to prosecute and for an accused to
14 defend an action in this jurisdiction. Hard to do when
15 everything points me to the fact that he doesn't live here.

16 MS. BRESLAW: No. I understand --

17 THE COURT: And I'm not a Federal Court Judge. I
18 don't have diversity jurisdiction. I have -- I'm limited
19 in that respect. You -- I hope you appreciate that.

20 MS. BRESLAW: No, I do. Maybe this could be
21 transferred to Federal Court then if that's the appropriate
22 jurisdiction? He targeted the --

23 THE COURT: That's --

24 MS. BRESLAW: -- state of Nevada. He specifically
25 -- he accused me of stalking a UNLV professor and he even

1 alleged that this went on for months. Implicit in that is
2 that UNLV was allowing this professor to be stalked. And I
3 feel that's target -- that is targeting, not just to me,
4 but the state. UNLV is a well-known institution. People
5 come from all over the world to -- on certain programs
6 there like their -- I think tourism and hospitality.

7 He even mentioned that I was in Las Vegas because
8 the police contacted him and he made a post where he
9 mentioned that I was in Las Vegas and then he shared his
10 libelous post. So, he knew I was in Nevada. He knew he
11 was targeting UNLV.

12 THE COURT: All right. Let's move forward to the
13 12(b)(6) issues. We've -- I addressed to my satisfaction
14 the 12(b)(2).

15 In the action, the defendant is asserting that you
16 failed to state a claim under libel per se because the
17 statements made by your own -- in your own Complaint are
18 basically your statements that were just reposted. What
19 is your response to that?

20 MS. BRESLAW: Okay. First, he -- I did post -- I
21 did make certain posts and he did not merely just repost
22 these posts. He -- I actually wanted to amend the
23 Complaint to add portrayal in a false light. He took posts
24 -- like an innocuous posts that I had made and he used them
25 to -- he, like, supported -- he used these posts to support

1 this narrative that I was stalking this professor. That's
2 just the main claim. I actually went in the Motion to
3 Amend and went point by point on each thing that he said
4 that was defamatory. He said that I tried to -- that I
5 told this professor that we would collaborate on a project.
6 That, after she refused, I started stalking her, that I
7 tried to have the dean fired. None of that was true.

8 THE COURT: Okay.

9 MS. BRESLAW: And he, like, --

10 THE COURT: All right.

11 MS. BRESLAW: Anyone can say, like a -- anyone can
12 say something or write something, and then you put it into
13 another context, and it looks like they said something
14 else. And, because of that post, which somehow got back to
15 -- I was very identifiable. He put a lot of information.
16 And I include in my user name, had 725 in it. So, everyone
17 knew right away that this was happening in Las Vegas.

18 THE COURT: Well, my zip code [sic] is 702. I
19 don't know what your zip code is -- or your area --

20 MS. BRESLAW: Yeah, no. It's 70 -- my old phone
21 number was a 725. It's a Henderson area code, but everyone
22 was able, from that 725, to know that this was happening in
23 Las Vegas.

24 THE COURT: Okay.

25 MS. BRESLAW: So, I'm sorry. I lost my train of

1 thought.

2 So, yes, he took these posts that I had made.
3 Nowhere -- I shared them in Exhibit 18, I think, nowhere
4 did I say I was stalking -- I was not stalking. I was not
5 contacting the professor. What happened was I -- I wanted
6 to retract a complaint. I never really wanted filed. Like
7 I said, in the Complaint, UNLV specifically their
8 department -- their history department chair really
9 mishandled this whole situation. And I was upset about it.
10 So, I made these innocuous posts just asking people, like,
11 for perspective. Why was this situation handled this way?
12 I was really upset about falling out with a professor. And
13 [inaudible] --

14 THE COURT RECORDER: Oh, she cut out, Your Honor.

15 THE COURT: Ms. -- well, I don't know what to do.
16 It's on here.

17 THE COURT RECORDER: She can't hear. I mean,
18 she's gone. She needs to reload.

19 MS. BRESLAW: [Inaudible] going to different
20 levels of administration and saying, like, -- you know, I
21 was -- there was a misunderstanding.

22 THE COURT: Ms. Breslaw.

23 MS. BRESLAW: I never wanted to --

24 THE COURT: Ms. Breslaw, take a --

25 MS. BRESLAW: Yeah.

1 THE COURT: -- moment, please.

2 MS. BRESLAW: Okay.

3 THE COURT: Your technology faltered there for
4 about 15, 20 seconds. All right?

5 MS. BRESLAW: Oh, okay.

6 THE COURT: We lost your signal. So, you need to
7 understand that whatever you said, say in the last half a
8 minute, we didn't hear and isn't on the record.

9 MS. BRESLAW: Okay, Your Honor.

10 THE COURT: So if there's something that -- all
11 right.

12 MS. BRESLAW: Okay. I'll --

13 THE COURT: So you know that. Okay.

14 MS. BRESLAW: I'll start it again. All right.
15 So, I'll start again.

16 I was posting on Reddit. Again, I was basically
17 just saying how upset I was over the situation with the
18 professor. I was asking for, like, perspective on, like,
19 academic stuff. You know, why would they handle this this
20 way, etcetera. And defendant took those posts and he
21 linked them. And he created a story around my post that
22 made it sound like I was stalking this professor. And that
23 was absolutely not true. I obviously wasn't stalking her.
24 I had -- I wasn't even contacting her. I was just like
25 contacting UNLV administration, saying, like, -- you know,

1 like, there was a misunderstanding. I never wanted a
2 complaint filed, etcetera. I was never contacting the
3 professor. I was not harassing anyone.

4 I didn't even receive the cease and desist letter
5 until defendant posted that post on Reddit. And I -- when
6 I talked to Debra, as soon as she sent me that cease and
7 desist letter, you may see it on there. It's Exhibit 19.
8 It said: This is not to be construed as all the facts and
9 circumstances around that matter. Something to that
10 effect. And I called to find out what she meant and she
11 specifically told me that she had seen this Reddit
12 activity, that she had seen that Reddit post.

13 And, I mean, how could -- I mean, think of all the
14 students that must have social media accounts and how did
15 this get back to UNLV's general counsel? Just after --
16 and, again, she -- I want to be clear. She did tell me
17 that she saw it. I'm not surmising this. I'm not -- it's
18 not like a hypothesis. I'm -- she explicitly said that she
19 saw that post and she knew -- I mean, she obviously knew
20 that it was me. That's why I got the cease and desist.
21 And I didn't -- I was just really stunned. I didn't
22 follow-up with her after that. I just, like, I fell
23 silent. And I just kind of agreed to abide by the cease
24 and desist. But there's no doubt that I was identified,
25 that the school was identified, and that this activity was

1 targeting UNLV.

2 Again, I had people figure -- I had that 725 in my
3 username. The police told defendant that I was in Las
4 Vegas and he made a post. I think it's Exhibit 13, saying
5 that, you know, that I received these reports from -- for
6 harassment by a woman in Las Vegas. What should I do? And
7 then, in that post, he shared the [indiscernible] Reddit
8 drama post, which it accuses me of stalking the professor.
9 And, again, implicit in that was that UNLV was allowing the
10 faculty member to be stalked. And that was just one of
11 numerous allegations. Again, there is -- I listed them
12 out. I would like to amend the Complaint. And I would
13 also like to add the claim of portrayal in a false light.

14 THE COURT: All right. I appreciate your
15 position.

16 Any reply?

17 MR. RAICH: Yes, Your Honor. A couple of things.

18 On the personal jurisdiction matter, I think the
19 plaintiff admitted that he was in the U.K. for the duration
20 of the Complaint -- or at least duration of the time frame
21 in which the Complaint alleges its facts.

22 The second thing is the plaintiff also stated that
23 she didn't contact UNLV or its professors, but the issue
24 that it looks like plaintiff has is with UNLV. I mean, the
25 -- it got to a point where the UNLV general counsel sent a

1 student a cease and desist. They don't just -- at least I
2 don't believe they would just do that willy-nilly. It
3 would take a lot of conflict between the student and UNLV
4 for the UNLV general counsel to step in and send them a
5 cease and desist for harassing the professors and staff.
6 So, -- and this is, again, based on the plaintiff's own
7 Complaint.

8 The plaintiff included a lot of exhibits and
9 things. This is not a summary judgment motion. This is a
10 Motion to Dismiss. So, the defendant is relying solely on
11 plaintiff's Complaint and the allegations made therein.

12 Now, the plaintiff also admitted that she's the
13 one who posted the issues that she was having with UNLV on
14 Reddit. And to then say that the defendant is responsible
15 because the defendant thereafter engaged in some sort of
16 alleged conversation with the plaintiff to a point where
17 plaintiff started harassing the defendant. And the
18 plaintiff just admitted that the defendant made a post
19 saying: What should I do, she's harassing me?

20 MS. BRESLAW: No, no.

21 MR. RAICH: And then posted that online.

22 And, so, based on kind of the facts that the
23 plaintiff has alleged in the Complaint, as well as those
24 that have been presented in front of Your Honor today,
25 dismissal is justified for personal jurisdiction grounds

1 for the failure to meet to the elements for libel and
2 intentional infliction of emotional distress, and if the
3 Court was to go forward thereunder NRS 41.650.

4 So, Your Honor, the defendant would like to ask
5 the Court to dismiss the case and to dismiss any pending
6 other Motions as moot. There are a couple of Motions set
7 forth for the Motion for Sur-Reply and to Amend. But,
8 given where we are, given the plaintiff's own allegations
9 as plead in the Complaint, amending the Complaint and
10 adding more facts or causes of action won't change the fact
11 that the Court doesn't have jurisdiction for this
12 defendant.

13 THE COURT: All right.

14 MR. RAICH: So, with that, Your Honor we'd like to
15 request the Court dismiss the matter and dismiss any
16 pending Motions as moot.

17 THE COURT: Thank you. I appreciate the argument
18 from both sides.

19 I have reviewed the totality of the Motions and,
20 having listened to argument, I believe the Motion to
21 Dismiss is well taken pursuant to 12(b)(2). So, I'm going
22 to grant on those grounds. I'm going to direct defense
23 counsel to prepare an Order consistent with that decision.

24 All right? And future Motions are vacated.

25 THE CLERK: So those Motions --

1 THE COURT: Yeah, they're --
2 MS. BRESLAW: Can I say one more thing?
3 THE COURT: Ms. Breslaw, you've had your day.
4 I've entered the decision. I appreciate your passion in
5 the effort, but I think personal jurisdiction, and the lack
6 thereof, is sufficient grounds to warrant a granting of
7 this Motion. So, that's my decision.
8 Thank you, all.

9
10 PROCEEDING CONCLUDED AT 9:57 A.M.

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CERTIFICATION

I certify that the foregoing is a correct transcript from the audio-visual recording of the proceedings in the above-entitled matter.

AFFIRMATION

I affirm that this transcript does not contain the social security or tax identification number of any person or entity.



KRISTEN LUNKWITZ
INDEPENDENT TRANSCRIBER



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Plaintiff, In Proper Person

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

Lisa Breslaw
Plaintiff

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

vs

Hearing Date:
February 22, 2022

Peter Cooper
Defendant

**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

Plaintiff LISA BRESLAW ("Breslaw" or "Plaintiff") hereby files this reply re: Defendant's Opposition to Motion to Vacate Order of Dismissal/Motion to Stay Order of Dismissal, Opposition to Defendant's Countermotion for Attorney's Fees Required to Respond to Plaintiff's "Frivolous and Vexatious Filings", Opposition to Defendant's request for an injunction preventing Plaintiff from filing "frivolous filings, and leave to file (2nd) amended complaint. This reply and opposition are 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 25th day of January, 2022

/s/Lisa Breslaw
LISA BRESLAW
7050 Shady Palms St.
Las Vegas, NV 89131
Plaintiff, In Proper Person

MEMORANDUM AND POINTS OF AUTHORITIES

INTRODUCTION

Plaintiff is a woman who was only trying to peacefully use Reddit when her life and career/education were upended by Defendant, a then 21-year-old male who maliciously accused her of stalking a UNLV professor, trying to force this professor to collaborate on a project with her, and then frivolously trying have UNLV administrators demoted. They then made repeated, unwanted contact with Plaintiff and continued harassing her despite a police warning to stop. Because of Defendant's tortious conduct, Plaintiff has not only suffered severe emotional trauma but now cannot attend graduate school in NV, which Defendant knew at the time was the only state she wanted to attend school and live/build her career in. Plaintiff then, in a timely manner (within the statute of limitations), filed this lawsuit in order to seek relief for the harm and injuries Defendant had caused her. However, the case was wrongly dismissed, and despite investing considerable time, energy, and money into this lawsuit, she was denied her "day in court." Meanwhile, Defendant has not been held in any way accountable for the harm he has caused Plaintiff, and Plaintiff continues suffering damages.

Defendant, through their attorney, Sagar Raich, Esq., is now (again) attempting to paint Plaintiff as a "vexatious" litigant and, after all their abusive and tortious conduct toward her, even has the audacity to request that she pay their attorneys fees. This in itself is further harassment by the Defendant. Below, Plaintiff will reply to Defendant's opposition to her motion to vacate/motion to stay order of dismissal (supporting her arguments with the applicable laws and standards), and oppose their countermotion for attorney fees and injunction from further filings. She additionally needs to file for leave to file a 2nd amended complaint, since Reddit has now removed the libelous content. (It has already caused her substantial and lasting damage, but she no longer needs an injunction to have it removed; she now needs an injunction to prevent Defendant from reposting it.)

APPLICABLE LAWS AND STANDARDS

In their opposition to Plaintiff's Motion to Vacate the Order (of Dismissal), and throughout this case, Defendant, through their attorney, has repeatedly pointed out that they were "not in Nevada" at the time they published their libelous post (and began harassing Plaintiff). However, physical presence in the state is not required to establish personal jurisdiction over a Defendant. Plaintiff again refers to **Calder vs. Jones** (See Opposition to Motion to Dismiss p.3 and Motion to Vacate Order of Dismissal p. 3-4). In *Calder*, the Court even agreed that neither petitioner's contacts with California would ordinarily be sufficient for an assertion of jurisdiction there [465 U.S. 783, 787]. *Perkins vs. Benguet Mining Co* 342 U.S. 437 (1952) had previously permitted general jurisdiction only when the defendant's contacts with the forum were "continuous and

systematic." *Calder*, however, established that personal jurisdiction in defamation cases could be based on where the effects were most felt.

In the January 4th (2022) hearing on Defendant's Motion to Dismiss, Defendant's Attorney pointed out that Shirley Jones, Respondent in *Calder vs. Jones* was a television actress in California. However, one does not need to be a celebrity in order to have their reputation based in a specific state. As mentioned in Plaintiff's Motion to Vacate Order (of Dismissal), and as Defendant knew when they published their libelous post, graduate school admissions are significantly based on an applicant's reputation and that Plaintiff exclusively intended to apply to NV schools. They also intentionally targeted NV by alleging that UNLV allowed a faculty member to be stalked.

In *Walden vs. Fiore*, the NV Supreme Court explained that "reputation based effects" were the key in the *Calder* decision. (*E'Cassanova vs. Morrow*, 2021 U.S. Dist. LEXIS 33257) However, unlike the *Walden* case, where there was no question that the conduct giving rise to the litigation took place in Atlanta, Plaintiff's reputational and emotional injuries undoubtedly took place in NV. (See Motion to Vacate p. 6-7) The Supreme Court in *Walden* even wrote, "In any event, this case does not present the very different questions whether and how a defendant's virtual "presence" and conduct translate into "contacts" with a particular state."

As is consistent with the principle of factoring reasonableness into jurisdiction, personal jurisdiction standards must evolve and adapt to each era. The idea of minimum contacts was itself an adaptation to changing times. In *International Shoe Co. vs. Washington* the Court acknowledged that "as the variety and effectiveness of forms of notice have increased, the requirement of a physical presence within a territory to exercise jurisdiction should be relaxed." Prior to *International Shoe*, jurisdiction was based on *Peynover vs. Neff*, where a state could not exert jurisdiction over an individual outside of its territory. (2 *Pennoyer v. Neff*, 95 U.S. 714, 733 (1878). In the 20th century, however, the Court recognized that people were becoming more mobile and that there was an increased need to establish jurisdiction over non-residents.

Similarly, Courts in the 21st Century must recognize the unique challenge that social media presents to traditional jurisdiction standards, especially regarding defamation. Unlike in the 20th century, the time of *Calder*, defamation no longer primarily involves celebrities or public figures being defamed by journalists, and on public social media platforms such as Reddit, one is statistically more likely to be defamed by a nonresident than someone from within their own state. Social media venues are also much more "omnipresent" than print media. Subredditdrama, for example, functions largely like a tabloid magazine, but the content is instantly accessible to anyone, anywhere. (They currently have 826, 000 subscribers, and this only includes the people who actively follow the site.) Thus, if jurisdictional standards are not flexible and reasonable enough to adapt to this and similar platforms, as this case demonstrates, anyone can have their reputation, career, and emotional well-being destroyed by a perfect stranger without recourse.

**PLEADING
CONTINUES
IN NEXT
VOLUME**