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Respondent in Proper Person

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Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF NEVADA

Tara Kellogg,

Appellant,

v.

Alex Ghibaudo,

Respondent.

Docket No.: 84778

**RESPONSE TO
APPELLANT'S DOCKETING
STATEMENT PURSUANT TO
NRAP 14(f)**

COMES NOW, Alex Ghibaudo, Respondent in proper person, and files this

Response to Appellant's Docketing Statement Pursuant to NRAP 14(f) as

follows:

DATED this 9th day of July, 2022.

/s/ Alex Ghibaudo

ALEX GHIBAUDO

Respondent in Proper Person



The district court made no error because Appellant admitted that she disseminated videos of hearings from the divorce proceedings in a deposition and response to interrogatories, under oath, held prior to the hearing held on March 21, 2022, which is the subject of this appeal. Furthermore, the district court did not err in finding that Alex timely objected to the dissemination of hearing videos, because on January 4, 2022, Alex made a formal request that Tara cease and desist from “further dissemination of those proceedings, to anyone...”

Additionally, the March 26, 2020 confidentiality agreement expressly addresses “confidential materials.” The agreement defines “confidential material as follows: By way of example, **but not limitation**, confidential Material includes the information, records and data concerning a party’s financial information, health care and records; business or **affairs of Alex B. Ghibaudo, Esq.** and/or Alex B. Ghibaudo, P.C....” (emphasis added).”

By executing that agreement, Tara waived her right to any protection under the 1st Amendment when she entered into the “Confidentiality Agreement”, which she does not challenge in this appeal.

DATED this 9th day of July, 2022.

/s/ Alex Ghibaudo
ALEX GHIBAUDO
Respondent in Proper Person



Certificate of Service

Pursuant to NRAP 25, on July 9th, 2022 **Response to Appellant's Docketing Statement Pursuant to NRAP 14(f)** was served upon each of the parties to appeal 84778 via electronic service through the Supreme Court of Nevada's electronic filing system.

/s/ Alex Ghibaudo

Respondent in Proper Person