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

11 TARA KELLOGG, A/K/A TARA  
12 KELLOGG-GHIBAUDO,

13 Appellant,

14 vs.

15 ALEX B. GHIBAUDO,

16 Respondent.

No. 84778  
Case No. D-15-522043-D

**Appellant's Reply Brief**

17 **APPEAL**

18 From the Eighth Judicial District Court, Clark County

19 The Honorable T. Arthur Ritchie  
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## Jurisdictional Statement

This is an appeal from the District Court's Findings of Fact, Conclusions of Law, and Order filed on April 14, 2022. Appellant's Appendix ("AA") 65-72. Appellant timely filed a Notice of Appeal on May 13, 2022. Pursuant to NRAP 3(a)(1) and NRAP 4 Appellant filed the Notice of Appeal "no later than 30 days after the date that written notice of entry of judgment or order appealed from is served."

This appeal is authorized pursuant to NRAP 3A(a) as Appellant is a "party who is aggrieved by an appealable judgment or order." This appeal is authorized pursuant to NRAP 3A(b)(3) which allows an appeal from an order granting an injunction.<sup>1</sup> "An injunction is '[a] court order commanding or preventing an action.'" *Peck v. Crouser*, 129 Nev. 120, 124, 295 P.3d 586, 588 (quoting Black's Law Dictionary 800 (8<sup>th</sup> ed. 2004); see also *Nken v. Holder*, 556 U.S. 418, 428 (2009) ("When a court employs the extraordinary remedy of injunction, it directs the conduct of a party." (internal quotation marks and citation omitted)). The order challenged here directs that the "distribution of private videos from [the district court] proceedings and any proceedings stemming from the parties' decree of divorce shall immediately cease." AA 65-72. The order also directs Appellant "to take active measures to remove the videos of the hearings from the [district court] proceedings previously posted publicly and videos stemming from the decree of divorce in these private proceedings previously posted publicly from public access." AA 65-72. It thus appears that the order is injunctive in nature and therefore appealable under NRAP 3A(b)(1). *Cf. Orange County v. Hongkong & Shanghai Banking*

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<sup>1</sup> Order, filed on 10-6-2022 in the instant Appeal.

1 *Corp. Ltd.*, 52 F.3d 821, 825-26 (9<sup>th</sup> Cir. 1995) (recognizing three  
2 fundamental characteristics of preliminary injunctions: they are (1)  
3 directed to a specific party, (2) enforceable by contempt, and (3) designed  
4 to accord or protect substantive relief (citing 16 Charles A. Wright et al.,  
5 Federal Practice and Procedure § 3922 at 29 (1977))); see also Johanson v.  
6 Dist. Court, 124 Nev. 245, 249 n. 9, 182 P.3d 94, 96 n.1 (2008) (suggesting  
7 without deciding, that a district court order prohibiting communications  
8 may constitute an injunction).

9 No actions or filings tolled the time for appeal under NRAP 4(a)(4).

#### 10 **Statement of Issues Presented for Review**

- 11 1. Did the District Court err in findings of fact that Appellant had  
12 disseminated hearing videos before and after the entry of a  
13 Confidentiality Agreement and Protective Order filed on 3-26-  
14 2020 (“3-26-2020 Agreement”)?
- 15 2. Did the District Court err in findings of fact and as a matter of law  
16 in concluding that Husband timely objected to the dissemination  
17 of hearing videos?
- 18 3. Did the District Court err as a matter of fact and law in finding  
19 that dissemination of hearing videos was in breach of the 3-26-  
20 2020 Agreement?
- 21 4. Did the District Court err as a matter of fact and law in ordering  
22 that the hearing videos are private and not accessible to the public  
23 and shall be removed from public inspection?
- 24 5. Did the District Court err as a matter of fact and law in entering  
25 orders pursuant to EDCR 5.210 and/or NRS 125.110?

1           6. Did the District Court err as a matter of fact and law in ordering  
2           that the distribution of videos from the Court proceedings  
3           immediately cease?

4                           **Statement of the Case and Facts**

5           Simply put, Respondent's Answering Brief and Appendix does not offer  
6           much in the way of relevant, material and useful facts for the Court.

7           The instant action arises from a Complaint for Divorced filed by  
8           Appellant in the Clark County District Court on October 1, 2015. AA 1-3.  
9           The Parties had one Minor Child at the time of filing for divorce, but there  
10          are no now Minor Children. AA 4-31. The Decree of Divorce granted the  
11          Parties the legal status of divorce and set Husband/Respondent's spousal  
12          support obligation. AA 4-31.

13          On November 10, 2020, the Court entered Findings of Fact, Conclusions  
14          of Law and Judgment ("11-10-2020 FFCL"). AA 45-46. The District Court  
15          adjudicated a number of post-decree of divorce issues.

16          Prior to the 11-10-2020 FFCL, the Parties entered into a Stipulated  
17          Confidentiality Agreement and Protective Order ("Protective Order") on  
18          March 26, 2020. AA 32-44. Respondent completely perverts and  
19          misconstrues what the Protective Order covers and does not. The  
20          Protective Order in no way shape or form contemplated hearing videos or  
21          matters outside of discovery and was entered into "to facilitate the  
22          disclosure of information..." as "this action involves or may involve the  
23          disclosure of documents and information potentially entitled to protection  
24          under N.R.C.P. Rule 16.2 and Rule 26(c)." AA 33. The Protective Order  
25          defined "Confidential Material" as follows:

26          "Confidential Material" shall mean all nonpublic or proprietary  
27          documents, material, and information potentially entitled to protection  
28

1 under N.R.C.P. Rule 16.2 and/or Rule 26(c) and shall apply to all  
2 documents and information received by a party in response to formal  
3 interrogatories, requests for production of documents, subpoena and/or  
4 as part of Mandatory Disclosures, including all such documents and  
5 information received and/or issued in this matter prior to entry of this  
6 agreement. AA 33.

7 The Protective Order went on to elaborate what could constitute  
8 Confidential Material, stating as follows:

9 By way of example, but not limitation, Confidential Material includes  
10 the information, records and data concerning a party's financial  
11 information, healthcare and records; business affairs of Alex B.  
12 Ghibaud, Esq., and/or Alex B. Ghibaud, P.C., including information  
13 concerning acquisition of business development opportunities, the  
14 identities of the current, former or prospective clients, suppliers and  
15 customers of that entity, development, transition and transformation  
16 plans, methodologies and methods of doing business, strategic,  
17 marketing and expansion plans, financial and business plans or  
18 analysis, financial data or statements, records from financial  
19 institutions, tax returns, bank statements, credit card statements,  
20 accounting records, communications by or to an Affiliate,  
21 agreements, contracts, corporate records, minutes of meetings,  
22 pricing information, employee lists and telephone numbers, location  
23 of suppliers, customers or sales representatives, new and existing  
24 customer supplier programs and services, customer or supplier  
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1 terms, customer service and integration processes, requirements and  
2 costs of providing products, services, support or equipment.<sup>2</sup>

3 The Protective Order might apply in a scenario in which Appellant  
4 received business records of Respondent during discovery and broadcasted  
5 the same all over the internet. Hearing videos are not items created or  
6 exchanged in discovery and fall well outside the scope of the Protective  
7 Order. Hearing Videos were likewise never marked as Confidential  
8 Material as would be required under the Protective Order. AA 34-35.  
9 Hearing Videos were certainly not marked as Confidential Materials prior  
10 to any alleged dissemination of hearing videos. Furthermore, the  
11 Protective Order itself states that materials that are obtained outside of  
12 discovery are not given enhanced protections of this Protective Order. The  
13 Protective Order specifically states as follows:

14 Nothing here shall impose any different or greater duties or  
15 obligations upon any party respecting documents, materials, or  
16 information obtained from other sources or by means other  
17 than discovery solely because those documents, materials, or  
18 information may have been designated as Confidential Material  
19 when produced in discovery herein; provided however that the  
20 embodiment of the material fact that has been designated  
21 hereunder shall itself be treated as Confidential Material.<sup>3</sup>

22 The District Court held an evidentiary hearing on contempt issues as  
23 they pertain to Respondent's failure to pay family support on February 15,  
24 2022. AA 57-64. In retaliation, Respondent caused a hearing to be held on

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25 <sup>2</sup> AA 33-34.

26  
27 <sup>3</sup> AA 39.

1 Respondent's claims of hearing video disclosures on March 21, 2022. AA  
2 65-72. On April 14, 2022, the District Court entered the Findings of Facts,  
3 Conclusion of Law, and Order ("4-14-2022 FFCL") dealing with the  
4 hearing video posting issues. AA 65-72.

5 The 4-14-2022 FFCL marked a rapid departure from any rights and  
6 obligations ever contemplated by the Parties in the Protective Order. AA  
7 65-72, 32-44. In example, the 4-14-2022 FFCL stated that the Protective  
8 Order "expressly provides that both of the parties have an expectation of  
9 privacy in these divorce proceedings (which encompasses videos of the  
10 proceedings in this case) stemming from these divorce proceedings and the  
11 decree of divorce issued February 2, 2017." AA 66. As set forth above, the  
12 Protective Order in no way shape or form contemplated hearing videos and  
13 dealt with discovery issues. AA 32-44. The 4-14-2022 FFCL goes on to  
14 incorrectly state that "the dissemination of videos of hearings and  
15 proceedings in this case is a direct violation of the Confidentiality  
16 Agreement and Protective Order filed on this on March 26, 2020." AA 66.  
17 The 4-14-2022 FFCL states with no evidentiary basis or support  
18 whatsoever that "Plaintiff has admitted that she has posted videos before  
19 and after the Confidentiality Agreement and Protective Order was  
20 executed or that she has facilitated the dissemination and posting of  
21 videos from these hearings before and after the Confidentiality Agreement  
22 was executed and that Plaintiff objects to such conduct." AA 67. The 4-14-  
23 2022 FFCL further states as follows:

24 ...a dissemination of videos from hearings in these proceedings  
25 violates Nevada law (NRS 125.110), violates Eighth Judicial  
26 District Court Rules (EDCR 5.210), and violates the express  
27 contract the parties executed...and balanced against the  
28

1 constitutional rights that both parties have in this case,  
2 dissemination of materials in this case, including but not  
3 limited, to videos from hearings in this case, is not allowed.<sup>4</sup>

4 The 4-14-2022 FFCL went even further, stating as follows:

5 THE COURT FURTHER ORDERS that Plaintiff is  
6 directed to take active measures to remove videos of  
7 hearings from these proceedings previously posted  
8 publicly and videos stemming from the decree of divorce  
9 in these private proceedings previously posted publicly  
10 from public access. AA 68.

11 The 4-14-2022 FFCL further adopted “as an order of the Court EDCR  
12 5.210 et seq. AA 69.

13 Respondent’s Statement of Facts and Appendix (“RA”) is a bizarre tour  
14 down every alley of what is not relevant or material to this case.

15 Respondent attached 692 pages of documents to the Appendix including  
16 duplicate copies of Appellant’s deposition. RA 94-297, 356-589.

17 Respondent’s Appendix also attaches copies of discovery responses that are  
18 lengthy. AA 29-93. The Deposition and Discovery requests have the  
19 common factor of things wholly unrelated to video posting issues. In  
20 example, these documents get into including but not limited to the  
21 following bizarre and distracting topics:

22 (a) Respondent’s ability or inability as a Father. RA 107.

23 (b) Respondent’s anger and attribution of conduct Respondent  
24 purportedly engaged in independent of Appellant to Appellant (e.g.  
25 grievances, bar complaints). RA 135.

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27 <sup>4</sup> AA 67.

1 (c) Whether Respondent is lazy and has no intention of working the rest  
2 of her life (e.g. Appellant not wanting to pay alimony). RA 258, 267-  
3 277.

4 (d) Respondent's paranoia about losing his law license and blaming  
5 Appellant for the same. RA 280-281.

6 (e) Discussion of other unrelated litigation brought by Respondent  
7 claiming he has somehow been defamed. RA 105.

8 Despite all this volume, Respondent's Appendix and factual argument fails  
9 to state what videos were posted, when were they posted, and were they  
10 posted and/or provided at all by Appellant. RA 79.

### 11 **Summary of the Argument**

12 The District Court made a number of errors in entering the 4-14-2022  
13 FFCL. The District Court found a number of facts that were not supported  
14 by evidence on the record (e.g. dissemination of videos). The District Court  
15 completely rewrote and perverted the purpose of the Protective Order from  
16 a discovery shield to a sword to be wielded against Appellant for conduct  
17 clearly outside of the Protective Order. The District Court erred as well in  
18 applying and entering as Orders the statutory provisions of EDCR 5.210  
19 and 125.110. The District Court created a de facto injunction without  
20 complying with the law and findings that must be made to order an  
21 injunction. In short, the District Court made something that was one thing  
22 (the Protective Order) wholly another thing and imposed obligations and  
23 rights upon the Parties that were never contemplated.

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1 **Argument**

2 **A. Standard of Review for Errors of Law and Errors of Fact**

3 The Court reviews errors of fact under the abuse of discretion standard.  
4 See e.g. Harrah's Las Vegas, LLC v. Muckridge, 473 P.3d 1020 (Nev. 2020).  
5 Walker v. Second Judicial District, 476 P.3d 1194 (Nev. 2020). The Court  
6 reviews errors of law under the de novo review standard. *Id.*

7 **B. The District Court Erred in Findings of Fact that Appellant**  
8 **had Disseminated Hearing Videos Before and After the Entry**  
9 **of the Protective Order**

10 The District Court found that "Plaintiff has admitted that she has  
11 posted videos before and after the Confidentiality Agreement and  
12 Protective Order was executed or that she has facilitated the  
13 dissemination and posting of videos from these hearings before and after  
14 the Confidentiality Agreement was executed..." AA 67. The District Court  
15 makes no findings as to where these admissions were made (e.g. in a  
16 pleading or in open court), to whom these videos were allegedly  
17 disseminated to, when specifically these videos were disseminated (even a  
18 ballpark) or other components of who, what, when, where and why that  
19 would support the finding. *Id.*

20 The Court erred in finding facts that Appellant disseminated videos  
21 before or after the Protective Order. A mere conclusion is not a finding of  
22 fact where the conclusion fails to state the basis for the conclusion. See e.g.  
23 Pundyk v. State, 467 P.3d 605 (Nev. 2020) (discussing admissible evidence  
24 of facts versus mere conclusions).

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1       **C. The District Court Erred in Findings of Fact and as a Matter**  
2       **of Law that Respondent Timely Objected to the**  
3       **Dissemination of Hearing Videos**

4       The District Court found that Respondent timely objected to the alleged  
5 posting of hearing videos. AA-67. The Protective Order was entered on  
6 March 26, 2020. AA 32-44. Respondent alleges that hearing videos from  
7 the family law case were being disseminated before March 26, 2020 and  
8 after March 26, 2020. Respondent waits, however, until 2022 to raise any  
9 issues about these postings. RA 33. The timeliness of an objection may be  
10 governed by a court rule, case law or statute. See e.g. Bahena v. Goodyear,  
11 235 P.3d 592 (Nev. 2010). At minimum, an objection must be made within  
12 a reasonable period of time where other authorities are lacking as to the  
13 appropriate time. See e.g. Wood v. State, 96 P.2d 441, 59 Nev. 445 (Nev.  
14 1939). *Nye County v. Washoe Medical Center*, 839 P.2d 1312, 108 Nev. 896  
15 (Nev. 1992). Parties to a contract are likewise expected to enforce their  
16 rights within a reasonable period of time or they run the risk of waiving  
17 their rights. See e.g. Hennessey v. Price, 604 P.2d 355, 96 Nev. 33 (Nev.  
18 1980). *Mosso v. Lee*, 295 P. 766, 53 Nev. 176 (Nev. 1931).

19       Respondent filed requests for relief as it pertains to hearing video issues  
20 in retaliation for Appellant enforcing her family support obligations. AA  
21 57-64, 65-72. Specifically, the Decision and Order on family support issues  
22 was entered on February 16, 2022 with the underlying motion filed on  
23 October 18, 2021. AA 57-64. Around the time of the hearing, Respondent  
24 then decides to raise the video issues. AA 65–72. At minimum, the Court  
25 erred in concluding that Respondent had filed a timely and appropriate  
26 objection to the video issues.

**D. The District Court Erred as a Matter of Fact and Law in Finding that Disseminating Hearing Videos was in Breach of the Protective Order**

The District Court concluded that “a dissemination of videos from hearings in these proceedings...violates the express contract the parties executed (Confidential Agreement and Protective Order filed March 26, 2020).” The Protective Order in no way shape or form contemplated hearing videos or matters outside of discovery and was entered into “to facilitate the disclosure of information...” as “this action involves or may involve the disclosure of documents and information potentially entitled to protection under N.R.C.P. Rule 16.2 and Rule 26(c).” AA-33. The core provisions of the Protective Order are set forth in Statement of Facts.

A contract must be interpreted in accordance with the contract’s plain meaning unless there’s an ambiguity that would otherwise require looking beyond the plain meaning. See e.g. Galardi v. Naples Polaris LLC, 301 P.2d 364 (Nev. 2013). The Protective Order in this matter spells out what is protected materials ad nauseum from business records, bank statements and the like. AA 32-44. The Protective Order is focused on discovery materials. *Id.* None of the expansive definition of Confidential Material includes hearing videos. *Id.* While documents were in discovery the Court did not find that these secret documents got leaked. AA 65-72. Likewise, the Court did not find that these discovery materials were discussed or referenced in the hearings. *Id.* In fact, the Court did not even find what if any hearing videos were leaked. Respondent cannot show from the record that his information was contained on any videos and is merely speculating that it was. Speculation does not equal proof of breach.

1 A Court cannot rewrite a contract for the Parties merely because one of  
2 the Parties might like that or wishes for different terms, breadth and  
3 scope. See e.g. Gartland v. Giesler, 604 P.2d 1238, 96 Nev. 53 (Nev. 1980).  
4 In the instant matter, Parties entered into an agreement about discovery  
5 materials and Respondent now wishes to weaponize this as a tool against  
6 any and all discussion of divorce proceedings regardless of whether it  
7 includes Confidential Material or not. Respondent cannot be permitted to  
8 turn a sword into a shield.

9 The Court erred in findings of fact and determinations of law in how it  
10 interpreted the contract and the underlying facts on the ground (e.g.  
11 hearing video dissemination versus bank records). In order to have  
12 breached a contract, one must have violated the terms. See e.g. Golden v.  
13 McKim, 37 Nev. 205, 141 P. 676, 678 (1914). In the instant matter,  
14 Appellant could not have breached the Protective Order as hearing videos  
15 were not contemplated by the Protective Order. Where the Court concludes  
16 hearing videos were contemplated this is a reversible determination under  
17 the de novo standard of review for questions of law. See e.g. Walker v.  
18 Second Judicial District, 476 P.3d 1194 (Nev. 2020).

19 **E. The District Court Erred as a Matter of Fact and Law in**  
20 **Applying NRS 125.110 and Granting an Effective Injunction**

21 The District Court first ruled that the hearing videos were private  
22 pursuant to the Protective Order. AA 65-72.

23 A detailed discussion of how NRS 125.110 is unconstitutionally vague is  
24 contained in Appellant's Opening Brief. A statute is unconstitutionally  
25 vague where it: (a) fails to provide notice sufficient to enable persons of  
26 ordinary intelligence to understand what conduct is prohibited and (2)  
27 lacks specific standards, thereby encouraging, authorizing or even failing  
28

1 to prevent arbitrary and discriminatory enforcement. *Silvar v. Distr. Ct.*,  
2 122 Nev. 289. 129 P.3d 682 (Nev. 2006). The statute fails to notify the  
3 public that hearing videos would fall under the umbrella of the statute and  
4 creates the danger of arbitrary or discriminatory enforcement as it  
5 pertains to videos that could permit one Judge to enforce the statute  
6 against a party for posting videos where another Judge would not. Such  
7 determinations would fly in the face of the long legal tradition of open  
8 access to the Courts.<sup>5</sup> The statute in question is akin to the loitering law in  
9 California found to be unconstitutionally vague in *Koldender v. Lawson*,  
10 461 U.S. 352 (1983) where the Supreme Court found “credible and reliable  
11 identification” to be too vague and leave way too much discretion to police.

12 The District Court made errors of fact and law in applying EDCR  
13 5.210. EDCR 5.210 did not go into effect until January 1, 2020. It should  
14 be noted that the Protective Order was entered before this date and did  
15 not contemplate any incorporation of EDCR 5.210. AA 32-44. Any Order  
16 sealing the divorce case would pre-date the current version of EDCR  
17 5.210. EDCR 5.210(a) states, “the court shall, upon the demand of either  
18 party, direct that the hearing or trial in action for divorce be private.” In  
19 the instant matter, there was no written demand pursuant to EDCR  
20 5.210 to seal a hearing or trial. Additionally, EDCR 5.210 would seal a  
21 case pursuant to NRS 125.080 and not NRS 125.110.

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27 <sup>5</sup> This case law is heavily briefed in Appellant’s Opening Brief.  
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**F. The District Court Erred as a Matter of Fact and Law in Entering Orders Pursuant to EDCR 5.210 and/or NRS 125.110. The Court Effectively Ordered an Injunction without Proper Legal Basis.**

The District Court entered an Order that “adopts as an order of the Court EDCR 5.210 et. seq.” AA 65-72. A detailed discussion of how these statutes offend the First Amendment is contained in Appellant’s Opening Brief. “An injunction is ‘[a] court order commanding or preventing an action.’ *Peck v. Crouser*, 129 Nev. 120, 124, 295 P.3d 586, 588 (quoting Black’s Law Dictionary 800 (8<sup>th</sup> ed. 2004)).<sup>6</sup> An injunction is exactly what the District Court created in this situation by ordering that distribution of hearing videos stop, required Appellant to request that videos be taken down, and even offered Respondent a path to seek contempt.

The Court failed to undergo the proper analysis in determining whether applying a permanent injunction (which the order appealed is). Specifically, the Court may only grant permanent injunctive relief where: (a) there is no adequate remedy at law; (b) a balancing of equities favors the moving party; and (c) success on the merits is demonstrated. *Chateau Vegas Wine, Inc. v. Southern Wine & Spirits*, 265 P.3d 680 (Nev. 2012). The Court made no such findings in entering the 4-14-2022 Order. If Respondent felt wronged he had a perfectly adequate remedy at law, a lawsuit for damages. Likewise, the equities most certainly do not favor trampling on the First Amendment. The Court decided to overstep

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<sup>6</sup> A detailed discussion of why the 4-14-2022 FFCL is an injunction is contained in the jurisdiction statement as well as the Order filed by the Nevada Supreme Court in this Appellate Matter on 10-6-2022.

1 completely and ordered that distribution of hearing videos stop, required  
2 Appellant to request that videos be taken down, and even offered  
3 Respondent a path to seek contempt.

4 **Conclusion**

5 For the reasons stated above, Appellant respectfully requests that the  
6 Court find that the District Court made errors of fact and law in the April  
7 14, 2022 Findings of Fact, Conclusions of Law and Order ("4-14-2022  
8 FFCL") and reverse the orders entered in the same.

9 Dated this 29<sup>th</sup> day of December 2022

10 Schwab Law Firm PLLC

11 */s/ Evan Schwab*

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1                                   **Attorney's Certificate of Compliance**

- 2       1. I certify that this Reply Brief complies with the formatting  
3           requirements of NRAP 32(a)(4), the typeface requirements of  
4           NRAP 32(a)(5) and the type style requirements of NRAP 32(a)(6)  
5           because it has been prepared in a proportionally spaced type face  
6           using Microsoft Word 2013 in 14 point Century School Book.
- 7       2. I further certify that this Reply Brief complies with the page – or  
8           type -volume limitations of NRAP 32(a)(7) because, excluding the  
9           parts of the brief exempted by NRAP 32(a)(7)(C), it is  
10          proportionally spaced, has typeface of 14 points or more, and  
11          contains 4,059 words.
- 12      3. Finally, I certify that I have read this Reply Brief, and to the best  
13          of my knowledge, information, and belief, it is not frivolous or  
14          interposed for any improper purpose. I further certify that this  
15          petition complies with all applicable Nevada Rules of Appellate  
16          Procedure, in particular NRAP 28(e)(1), which requires every  
17          assertion in the petition regarding matters in the record to be  
18          supported by a reference to the page and volume number, if any of  
19          the transcript or appendix where the matter relied on is to be  
20          found.

21                           [Remainder of Space Intentionally Left Blank]  
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1 4. I understand that I may be subject to sanctions in the event that  
2 the accompanying petition is not in conformity with the  
3 requirements of the Nevada Rules of Appellate Procedure.

4 Dated this 29<sup>th</sup> day of December 2022

5 Schwab Law Firm PLLC

6 /s/ *Evan Schwab*

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**Lansford W. Levitt, Settlement Judge**  
**Schwab Law Firm PLLC**  
**JK Nelson Law LLC**  
**Alex B. Ghibaud, P.C.**

**An Employee of Schwab Law Firm PLLC**