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 13 Department, Andrew Bauman, Matthew Kravetz, Supreet Kaur,  
 14 David Jeong, and Theron Young

15

16 **UNITED STATES DISTRICT COURT**  
 17 **DISTRICT OF NEVADA**

18 CONNIE SEMPER<sup>1</sup>, an individual; ASHLEY  
 19 MEDLOCK, an individual; LONICIA  
 20 BOWIE, an individual; MICHAEL GREEN,  
 21 an individual; CLINTON REECE, an  
 22 individual; COREY JOHNSON, an  
 23 individual; DEMARLO RILEY, an  
 24 individual; CORY BASS, an individual;  
 25 CARLOS BASS, an individual; BREANNA  
 NELLUMS, an individual; and ANTONIO  
 WILLIAMS, an individual,

Case Number:  
 2:20-cv-01875-JCM-EJY

26

27 **LVMPD DEFENDANTS' MOTION TO**  
**DISMISS PLAINTIFFS' FIRST**  
**AMENDED COMPLAINT PURSUANT**  
**TO RULES 37(d) AND 41(b) FOR**  
**PLAINTIFF ANTONIO WILLIAMS**

28 Plaintiffs,

vs.

29 LAS VEGAS METROPOLITAN POLICE  
 30 DEPARTMENT, in its official capacity;  
 31 ANDREW BAUMAN, individually and in  
 32 his capacity as a Las Vegas Metropolitan  
 33 Police Department Officer; DAVID JEONG,  
 34 individually and in his capacity as a Las  
 35 Vegas Metropolitan Police Department  
 36 Officer; SUPREET KAUR, individually and  
 37 in his capacity as a Las Vegas Metropolitan  
 38 Police Department Officer; MATTHEW  
 39 KRAVETZ, individually and in his capacity  
 40 as a Las Vegas Metropolitan Police  
 41 Department Officer; and THERON YOUNG,  
 42 individually and in his capacity as a Las  
 43 Vegas Metropolitan Police Department  
 44 Officer,

45 Defendants.

46

47 <sup>1</sup> Pursuant to FRCP 25, Ms. Semper has been substituted for Phillip Semper pursuant to this court's  
 48 order date January 13, 2022, as she is the executrix of his estate.

1 Defendants, the Las Vegas Metropolitan Police Department (the “Department” or  
 2 “LVMPD”), Andrew Bauman (“Bauman”), Matthew Kravetz (“Kravetz”), Supreet Kaur  
 3 (“Kaur”), David Jeong (“Jeong”), and Theron Young (“Young”), collectively (“LVMPD  
 4 Defendants”), by and through their attorneys of record, the law firm of Marquis Aurbach,  
 5 hereby submit their Motion to Dismiss Plaintiff’s First Amended Complaint Pursuant to  
 6 Rules 37(d) and 41(b) for Plaintiff Antonio Williams. This Motion is made and based upon  
 7 all papers, pleadings, and records on file herein, the attached Memorandum of Points and  
 8 Authorities, and any oral argument allowed at a hearing on this matter.

9 **MEMORANDUM OF POINTS & AUTHORITIES**

10 **I. INTRODUCTION**

11 LVMPD Defendants ask that this Court strike Plaintiff’s First Amended Complaint  
 12 in relation to Antonio Williams for failing to prosecute his case, including failing to provide  
 13 discovery responses and appear for his deposition. Without Plaintiff’s participation in the  
 14 discovery process, LVMPD Defendants will be significantly prejudiced and unable to  
 15 prepare a defense to Plaintiff’s case. Plaintiff’s egregious conduct must be sanctioned, and  
 16 therefore, dismissal of Plaintiff’s claims is appropriate.

17 **II. STATEMENT OF FACTS AND PROCEDURAL HISTORY**

18 Plaintiff Antonio Williams (“Plaintiff”) initiated the instant action seeking damages  
 19 under 42 U.S.C. § 1983 alleging that LVMPD and its officers violated Plaintiff’s civil rights.  
 20 ECF No. 1-1. Subsequently, the Court granted counsel’s request to withdraw from  
 21 representation as to Plaintiff. ECF Nos. 55 and 58. Notably, the motion to withdraw as  
 22 counsel describes counsel’s inability to communicate with Plaintiff as a basis for  
 23 withdrawal. ECF No. 55. Plaintiff has not participated in and has failed to prosecute his case  
 24 since the withdrawal of his counsel.

25 First, LVMPD Defendants have filed several motions that have not received any  
 26 response from Plaintiff. *See* ECF Nos. 70, 80, 100. LVMPD Defendants further served  
 27 discovery requests upon Plaintiff and never received any response. *See* Discovery Requests  
 28 collectively attached hereto as **Exhibit A**; *See* Declaration of Jackie V. Nichols, Esq.

1 attached hereto as **Exhibit B**. Nearly a year later, LVMPD Defendants sent a letter to  
 2 Plaintiff requesting that Plaintiff either provide discovery responses or that Plaintiff make  
 3 himself available for a meet and confer. *See* Letter attached hereto as **Exhibit C; Exhibit B**.  
 4 Plaintiff neglected to provide discovery responses and did not participate in a meet and  
 5 confer with counsel. **Exhibit B**.

6 Thereafter, LVMPD Defendants' noticed Plaintiff's deposition for March 15, 2023.  
 7 *See* Deposition Notice attached hereto as **Exhibit D**. Plaintiff did not appear for his  
 8 deposition. *See* Transcript of Non-Appearance of Antonio Williams attached hereto as  
 9 **Exhibit E**. Counsel for LVMPD Defendants has not received any communication from  
 10 Plaintiff. **Exhibit B**.

11 **III. LEGAL ARGUMENT**

12 **A. LEGAL STANDARD.**

13 The Court has the power to dismiss an action, in whole or in part, for discovery  
 14 misconduct and/or violations of Court orders. *See, e.g., Dreith v. Nu Image, Inc.*, 648 F.3d  
 15 779, 786 (9th Cir. 2011). Although Defendant asks this Court to dismiss Plaintiff's  
 16 Complaint pursuant to Rules 37(d) and 41(b) specifically, Plaintiff's conduct implicates  
 17 numerous provisions of the Rules. For example, Rule 16 is a central pretrial rule that  
 18 authorizes the Court to manage cases "so that disposition is expedited, wasteful pretrial  
 19 activities are discouraged, the quality of the trial is improved, and settlement is facilitated."  
 20 *In re Phenylpropanolamine Prods. Liability Litig.*, 460 F.3d 1217, 1227 (9th Cir. 2006).  
 21 "Subsection (f) puts teeth into these objectives by permitting the judge to make such orders  
 22 as are just for a party's failure to obey a scheduling or pretrial order, including dismissal."  
 23 *Id.*; *see also* Rule 16(f)(1)(C).

24 Rule 37 provides for sanctions against a party for discovery misconduct. Rule  
 25 37(d)(1)(A) states, in pertinent part, "[t]he court ... may, on motion, order sanctions if: a  
 26 party ... fails, after being served with proper notice, to appear for that person's deposition."  
 27 Sanctions provided under these provisions of Rule 37 include "striking pleadings in whole  
 28 or in part" and "dismissing the action or proceeding in whole or in part." *See* Rule

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1 37(b)(2)(A)(iii) and (vi). Lastly, Rule 41(b) states, in pertinent part, “[i]f the plaintiff fails to  
 2 prosecute or to comply with these rules or a court order, a defendant may move to dismiss  
 3 the action or any claim against it.”

4 Dismissal for failure to obey a court order or provide discovery is a harsh penalty  
 5 and should only be imposed in extreme circumstances. *Malone v. U.S. Postal Serv.*, 833  
 6 F.2d 128, 130 (9th Cir. 1987); *Thompson v. Housing Authority of the City of Los Angeles*,  
 7 782 F.2d 829, 831 (9th Cir.1986).

8 When evaluating whether case-dispositive sanctions are appropriate, the Court  
 9 considers five factors: “1) the public’s interest in expeditious resolution of litigation; 2) the  
 10 court’s need to manage its docket; 3) the risk of prejudice to the defendants; 4) the public  
 11 policy favoring disposition of cases on their merits and 5) the availability of less drastic  
 12 sanctions.” *Phenylpropanolamine Products*, 460 F.3d at 1226 (internal citations and  
 13 quotations omitted). These factors are “not a series of conditions precedent before the judge  
 14 can do anything,” but a “way for a district judge to think about what to do.” *Id.* The Ninth  
 15 Circuit affirms dismissal where at least four factors support dismissal or where at least three  
 16 factors “strongly” support dismissal. *Hernandez v. City of El Monte*, 138 F.3d 393, 399 (9th  
 17 Cir.1998). In determining an appropriate sanction, the court may consider all of the  
 18 offending party’s litigation conduct. *See, e.g., Henry v. Gill Industries, Inc.*, 983 F.2d 943,  
 19 947 (9th Cir. 1993).

20 **B. THE COURT SHOULD STRIKE PLAINTIFF’S FIRST AMENDED  
 21 COMPLAINT AND DISMISS THE CASE.**

22 Plaintiff’s refusal to prosecute his case, including responding to discovery requests  
 23 and appearing for his deposition, requires this Court to strike Plaintiff’s First Amended  
 24 Complaint and dismiss his claims. The factors this Court must consider in determining  
 25 whether case-dispositive sanctions favor dismissal.

26 **1. Expeditious Resolution of Litigation.**

27 “Orderly and expeditious resolution of disputes is of great importance to the rule of  
 28 law. By the same token, delay in reaching the merits ... is costly in money, memory,

1 manageability, and confidence in the process.” Phenylpropanolamine Products., 460 F.3d at  
 2 1227. Discovery in this case began nearly two years ago (ECF No. 44), but due to Plaintiff’s  
 3 disregard for his discovery obligations, no discovery has been conducted in related to  
 4 Plaintiff. Since counsel withdrew, Plaintiff has done absolutely nothing to further this  
 5 litigation. Plaintiff’s discovery failures are well-documented and Plaintiff has provided no  
 6 justification for, let alone communicated, his refusal to not meaningfully participate in this  
 7 case. Plaintiff’s egregious behavior is contrary to Rule 1’s directive to “secure a just, speedy,  
 8 and inexpensive” determination of this case.

9                   **2. Court’s Need to Manage its Docket.**

10                  The Court’s inherent power to control its docket includes the ability to issue  
 11 sanctions of dismissal where appropriate. *Thompson*, 782 F.2d at 831. “It is incumbent upon  
 12 us to preserve the district courts’ power to manage their dockets” without being subject to  
 13 endless non-compliance with case management orders. *Ferdik v. Bonzelet*, 963 F.2d 1258,  
 14 1261 (9th Cir. 1992) (as amended). In addition, the Supreme Court has recognized that  
 15 dismissal “must be available to the district court in appropriate cases, not merely to penalize  
 16 those whose conduct may be deemed to warrant such a sanction, but to deter those who  
 17 might be tempted to such conduct in the absence of such a deterrent.” *Phenylpropanolamine*  
 18 *Products*, 460 F.3d at 1227 (citing *Nat'l Hockey League v. Metro. Hockey Club, Inc.*, 427  
 19 U.S. 639, 643(1976)).

20                  Plaintiff’s refusal to comply his discovery obligations and to meaningfully  
 21 participate in discovery has thwarted the advancement of this case by making it difficult for  
 22 the Court to effectively manage its docket.

23                   **3. Risk of Prejudice to Defendants.**

24                  “A defendant suffers prejudice if the plaintiff’s actions impair the defendant’s ability  
 25 to go to trial or threaten to interfere with the rightful decision of the case.” *Adriana Int'l*  
 26 *Corp. v. Thoeren*, 913 F.2d 1406, 1412 (9th Cir.1990). Failing to provide discovery as  
 27 ordered is considered sufficient prejudice, as is the unjustified failure to appear at scheduled  
 28 depositions. *Id.* Thus, the risk of prejudice to Defendants is clear. By not meaningfully

1 participating in discovery, Plaintiff has failed to identify evidence and witnesses supporting  
 2 his claims and, consequently, has made it impossible for Defendants to properly defend  
 3 against those claims. Additionally, Plaintiff has provided no justification for failing to  
 4 appear at his noticed deposition, and has not made any attempt to reschedule the deposition.

5 **4. Public Policy**

6 The public policy favoring disposition of cases on their merits “strongly counsels  
 7 against dismissal.” *Phenylpropanolamine Products*, 460 F.3d at 1228. “At the same time, a  
 8 case that is stalled or unreasonably delayed by a party’s failure to comply with deadlines and  
 9 discovery obligations cannot move forward toward resolution on the merits.” *Id.* Therefore,  
 10 this factor “lends little support” to a party whose responsibility it is to move a case toward  
 11 disposition on the merits but whose conduct impedes progress in that direction. *Id.*

12 Here, Plaintiff’s conduct has significantly impeded the progress of this case toward  
 13 disposition on the merits. Therefore, this Court should conclude that resolving this case on  
 14 the merits is impossible due to Plaintiff’s conduct. Plaintiff’s refusal to participate in  
 15 discovery and take any action in this case demonstrates Plaintiff is unlikely to pursue his  
 16 case.

17 **5. Availability of Less Drastic Sanctions.**

18 The Court “abuses its discretion if it imposes a sanction of dismissal without first  
 19 considering the impact of the sanction and the adequacy of less drastic sanctions.” *In re  
 20 Phenylpropanolamine (PPA) Products Liab. Litig.*, 460 F.3d at 1228 (internal quotes and  
 21 citations omitted). Two questions facilitate this analysis: (1) whether the court considered  
 22 lesser sanctions and their adequacy and (2) whether the court warned the recalcitrant party  
 23 about the possibility of case-dispositive sanctions. *Connecticut General Life Ins. Co. v. New  
 24 Images of Beverly Hills*, 482 F.3d 1091, 1096 (9th Cir. 2007).

25 While LVMPD Defendants did not previously move for a Court order compelling  
 26 Plaintiff to provide discovery responses or appear at his deposition, less drastic sanctions are  
 27 not appropriate. It is apparent that Plaintiff has not participated in good faith or otherwise in  
 28 the discovery process and has no intention of attempting to comply with his pre-trial

1 obligations. As a result, less drastic sanctions would not be effective in this case. Plaintiff  
2 failed to provide responses to discovery and neglected to appear for his deposition. Plaintiff  
3 has made no attempt to reach out to LVMPD Defendants to address any discovery. Thus,  
4 this Court should conclude Plaintiff has abandoned his claims. *See, e.g., Daniels v. Jenson,*  
5 2013 WL 1332248, \*4 (D. Nev. Mar. 11, 2013), adopted 2013 WL 1332248 (D. Nev. Apr.  
6 1, 2013).

7 **IV. CONCLUSION**

8 Based on the foregoing, LVMPD Defendants respectfully request the Court grants  
9 their Motion to Dismiss Plaintiff's First Amended Complaint Pursuant to Rules 37(d) and  
10 41(b) for Plaintiff Antonio Williams.

11 Dated this 4th day of April, 2023.

12 MARQUIS AURBACH  
13  
14

15 By:/s/ Jackie V. Nichols \_\_\_\_\_  
16 Craig R. Anderson, Esq.  
17 Nevada Bar No. 6882  
18 Jackie V. Nichols, Esq.  
19 Nevada Bar No. 14246  
20 10001 Park Run Drive  
21 Las Vegas, Nevada 89145  
22 Attorneys for Defendants Las Vegas  
23 Metropolitan Police Department, Andrew  
24 Bauman, Matthew Kravetz, Supreet Kaur,  
25 David Jeong, and Theron Young  
26  
27  
28

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**CERTIFICATE OF SERVICE**

2 I hereby certify that I electronically filed the foregoing **LVMPD DEFENDANTS'**  
3 **MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT**  
4 **PURSUANT TO RULES 37(d) AND 41(b) FOR PLAINTIFF ANTONIO WILLIAMS**  
5 with the Clerk of the Court for the United States District Court by using the court's CM/ECF  
6 system on the 4th day of April, 2023.

7  I further certify that all participants in the case are registered CM/ECF users  
8 and that service will be accomplished by the CM/ECF system.

9         I further certify that some of the participants in the case are not registered  
10 CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid,  
11 or have dispatched it to a third party commercial carrier for delivery within 3 calendar days  
12 to the following non-CM/ECF participants:

Carlos Bass  
2621 Sommer Ct.  
North Las Vegas, Nevada 89032  
*Plaintiff Pro Per*

Cory Bass  
2621 Sommer Ct.  
North Las Vegas, Nevada 89032  
*Plaintiff Pro Per*

Breanna Nellums  
4012 Warm Hearted Ct.  
North Las Vegas, Nevada 89032-6169  
*Plaintiff Pro Per*

Antonio Williams  
3912 Red Trumpet Ct.  
North Las Vegas, Nevada 89081-4023  
*Plaintiff Pro Per*

/s/ Krista Busch  
An employee of Marquis Aurbach

# **EXHIBIT A**

## **Discovery Requests**

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

PHILLIP SEMPER, an individual; COREY JOHNSON, an individual; ASHLEY MEDLOCK, an individual; CORY BASS, an individual; MICHAEL GREEN, an individual; DEMARLO RILEY, an individual; BREANNA NELLUMS, an individual; CLINTON REECE, an individual; ANTONIO WILLIAMS, an individual; LONICIA BOWIE, an individual; CARLOS BASS, an individual; and DEMETREUS BEARD, an individual.

Case Number:  
2:20-cv-01875-JCM-EJY

**LVMPD DEFENDANTS' FIRST SET OF  
INTERROGATORIES TO PLAINTIFF  
ANTONIO WILLIAMS**

**Plaintiffs,**

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, in its official capacity;  
SHERIFF JOSEPH LOMBARDO, individually  
and in his official capacity as Sheriff of the Las  
Vegas Metropolitan Police Department;  
ANDREW BAUMAN, individually and in his  
capacity as a Las Vegas Metropolitan Police  
Department Officer; MATTHEW KRAVETZ,  
individually and in his capacity as a Las Vegas  
Metropolitan Police Department Officer;  
SUPREET KAUR, individually and in his  
capacity as a Las Vegas Metropolitan Police  
Department Officer; DAVID JEONG,  
individually and in his capacity as a Las Vegas  
Metropolitan Police Department Officer;  
THERON YOUNG, individually and in his  
capacity as a Las Vegas Metropolitan Police  
Department Officer; CAESARS  
ENTERTAINMENT CORPORATION D/B/A  
RIO ALL-SUITES HOTEL; RIO PROPERTIES

1 LLC; JOHN CARLISLE, individually and in his  
 2 capacity as an employee of the Rio Hotel &  
 3 Casino; DOE LVMPD GANG TASK FORCE  
 4 OFFICERS 1-10; DOE LVMPD OFFICERS 1-  
 5 10; DOE LVMPD SUPERVISORS 1-5; DOE  
 6 RIO EMPLOYEES 1-10,

7 Defendants.

8 **LVMPD DEFENDANTS' FIRST SET OF INTERROGATORIES TO PLAINTIFF**  
 9 **ANTONIO WILLIAMS**

10 TO: Antonio Williams, *Plaintiff Pro Per*

11 In accordance with FRCP 33, Defendants, the Las Vegas Metropolitan Police Department  
 12 (the "Department" or "LVMPD"), Sheriff Joseph Lombardo ("Lombardo"), Andrew Bauman  
 13 ("Bauman"), Matthew Kravetz ("Kravetz"), Supreet Kaur ("Kaur"), David Jeong ("Jeong"), and  
 14 Theron Young ("Young"), collectively ("LVMPD Defendants"), by and through their attorneys,  
 15 Marquis Aurbach, hereby requests that Plaintiff Antonio Williams ("Williams") answer in  
 16 writing and under oath, and serve upon the undersigned counsel for LVMPD Defendants, within  
 17 thirty (30) days of the date of service thereof, his answers to the Interrogatories set forth below.

18 **PRELIMINARY EXPLANATIONS AND DEFINITIONS**

19 The following definitions are applicable throughout the Interrogatories which follow:

20 1. "Document" includes written reports, letters, books, telegrams, memoranda,  
 21 drawings, notes, tape recordings, photographs, or any other written or graphic material  
 22 communication however denominated.

23 2. "FAC" means the First Amended Complaint filed on September 15, 2020 in the  
 24 above-referenced case.

25 3. "Facts" means all circumstances, events and evidence pertaining to or touching  
 26 upon the item in question.

27 4. "Identify" means to:

28 a. State the full name of the person, entity, writing, statement, or document;  
 29 b. State the present or last-known address of the person, entity, writing,  
 30 statement, or document;

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c. State the present or last-known position and business affiliation of the person or entity; and

d. Describe the relationship to you of the person, entity, writing, statement or document.

5. "Person" includes natural persons, partnerships, consortiums, joint ventures, and every other form of legally recognized entity, including corporations.

6. "Statement" includes each recordation of any interview or conversation with a witness, whether by a signed or unsigned writing, recording, court reported statement or otherwise.

7. "Witness" means the name, address and telephone number of each person having knowledge of or pertaining to the item in question.

8. "Writing" includes, but is not limited to, any record, minutes of meetings, agreement, contract, memorandum, map, diagram, illustration, photograph, telegram, written analysis, report, recording, transcription, and memoranda made of any telephone communication or face-to-face oral meeting or conversation, written communication (which includes, but is not limited to, any letter, interoffice communication and telegram), paper, book or other document. It includes the original, any copy and any drafts thereof.

9. "You" refers to the party or parties to whom these Interrogatories are directed.

## INTERROGATORIES

**INTERROGATORY NO. 1:**

State all present and prior employments for the past five (5) years, including the dates of employment, the name of the employer and the Plaintiff's immediate supervisor, the rate of pay, the job title, and brief description of the duties involved.

**INTERROGATORY NO. 2:**

Identify any racial slurs, terms, or epitaphs used by any of the LVMPD officers during the time period discussed in the FAC.

1 **INTERROGATORY NO. 3:**

2 Identify the facts that support your contention that there was another party, on the same  
3 floor just down the hall and attended predominately by white guests, was not interrupted by  
4 LVMPD officers as alleged in the FAC.

5 **INTERROGATORY NO. 4:**

6 Identify the facts that support your contention that the surveillance methods employed by  
7 Defendant LVMPD's Gang Crime Section have a discriminatory impact on people of color  
8 residing in Clark County, Nevada as alleged in the FAC.

9 **INTERROGATORY NO. 5:**

10 Identify the facts that support your contention that LVMPD implements the "party  
11 crashers" protocol against parties attended by African Americans but not against parties attended  
12 predominately by white individuals as alleged in the FAC.

13 **INTERROGATORY NO. 6:**

14 Identify and describe each similar situation that supports your contention that LVMPD  
15 implements the "party crashers" protocol against parties attended by African Americans but not  
16 against parties attended predominately by white individuals as alleged in the FAC.

17 **INTERROGATORY NO. 7:**

18 Identify what you were wearing during the time period discussed in the FAC.

19 **INTERROGATORY NO. 8:**

20 Identify the officer that you contend frisked you as alleged in the FAC.

21 **INTERROGATORY NO. 9:**

22 Identify the officer that you contend detained you as alleged in the FAC.

23 **INTERROGATORY NO. 10:**

24 Identify the officer that you contend handcuffed you as alleged in the FAC.

25 **INTERROGATORY NO. 11:**

26 Identify the facts that support your contention that LVMPD maintains a policy of  
27 responding to parties by searching and detaining every person on the premise regardless of the  
28

1 existence of individualized probable cause or reasonable suspicion in violation of your  
2 constitutional rights.

3 **INTERROGATORY NO. 12:**

4 Describe in detail what you were doing from the time you arrived to the Rio Hotel to the  
5 time you contend you were detained.

6 **INTERROGATORY NO. 13:**

7 Describe in detail your activity between the time you entered the Rio Hotel and the time  
8 you were allegedly unconstitutionally restrained and detained.

9 **INTERROGATORY NO. 14:**

10 Identify the total amount of damages you claim as a result of the allegations of your  
11 complaint, itemizing each element of damage separately, describing the claim it is related to and  
12 the method by which you determined the amount.

13 **INTERROGATORY NO. 15:**

14 Regarding your contention that the detention was conducted without reasonable  
15 suspicion, identify all facts and identify any and all documents relied upon by you in support of  
16 such contention.

17 **INTERROGATORY NO. 16:**

18 Describe in detail the facts that support your 42 U.S.C. §1983 Civil Conspiracy Claim.

19 **INTERROGATORY NO. 17:**

20 Describe in detail the facts that support your 42 U.S.C. §1985 Civil Conspiracy Claim.

21 **INTERROGATORY NO. 18:**

22 Identify the individuals you contend conspired to violate your civil rights as alleged in the  
23 FAC.

24 **INTERROGATORY NO. 19:**

25 Specify in detail the agreement to perform or conduct an unlawful act in support of your  
26 conspiracy claims

27

28

1 | INTERROGATORY NO. 20:

Identify the facts that support your contention that LVMPD does not have a procedure to enable each person involved in a search and seizure the right to file a grievance to contest illegal acts and acts motivated by bias.

5 | INTERROGATORY NO. 21:

6 Identify the facts that support your contention that LVMPD does not have clear and  
7 consistent discipline in the event a grievance is sustained.

8 | INTERROGATORY NO. 22:

9 Identify each and every instance where LVMPD officers responded to party and searched  
10 and detained every person on the premise regardless of the existence of individualized probable  
11 cause or reasonable suspicion.

12 | INTERROGATORY NO. 23:

13 Identify the facts that support your contention that LVMPD officers intentionally  
14 discriminated against you.

15 | **INTERROGATORY NO. 24:**

16 Identify each and every criminal charge filed against Plaintiff in the past ten (10) years,  
17 including the town or city wherein the charge was filed and the ultimate disposition of such  
18 charge.

19 Dated this 16th day of March, 2022.

## MARQUIS AURBACH

By: /s/ Jackie V. Nichols

Craig R. Anderson, Esq.

Nevada Bar No. 6882

Jackie V. Nichols, Esq.

Nevada Bar No. 14246

10001 Park Run Drive

Las Vegas, Nevada 89

Attorneys for Defendants I

## Metropolitan Police D

Lombardo, Andrew B.

Supreet Kaur, David J.

1000000, as shown

6 of 6



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canderson@maclaw.com  
jnjchols@maclaw.com  
9 Attorneys for Defendants Las Vegas Metropolitan  
Police Department, Sheriff Joseph Lombardo,  
Andrew Bauman, Matthew Kravetz, Supreet Kaur,  
David Jeong, and Theron Young

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

PHILLIP SEMPER, an individual; COREY JOHNSON, an individual; ASHLEY MEDLOCK, an individual; CORY BASS, an individual; MICHAEL GREEN, an individual; DEMARLO RILEY, an individual; BREANNA NELLUMS, an individual; CLINTON REECE, an individual; ANTONIO WILLIAMS, an individual; LONICIA BOWIE, an individual; CARLOS BASS, an individual; and DEMETREUS BEARD, an individual.

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**LVMPD DEFENDANTS' FIRST SET OF  
REQUESTS FOR ADMISSIONS TO  
PLAINTIFF ANTONIO WILLIAMS**

**Plaintiffs,**

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, in its official capacity;  
SHERIFF JOSEPH LOMBARDO, individually  
and in his official capacity as Sheriff of the Las  
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ANDREW BAUMAN, individually and in his  
capacity as a Las Vegas Metropolitan Police  
Department Officer; MATTHEW KRAVETZ,  
individually and in his capacity as a Las Vegas  
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SUPREET KAUR, individually and in his  
capacity as a Las Vegas Metropolitan Police  
Department Officer; DAVID JEONG,  
individually and in his capacity as a Las Vegas  
Metropolitan Police Department Officer;  
THERON YOUNG, individually and in his  
capacity as a Las Vegas Metropolitan Police  
Department Officer; CAESARS  
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RIO ALL-SUITES HOTEL; RIO PROPERTIES

1 LLC; JOHN CARLISLE, individually and in his  
2 capacity as an employee of the Rio Hotel &  
3 Casino; DOE LVMPD GANG TASK FORCE  
4 OFFICERS 1-10; DOE LVMPD OFFICERS 1-  
5 10; DOE LVMPD SUPERVISORS 1-5; DOE  
6 RIO EMPLOYEES 1-10,

7 Defendants.

8 **LVMPD DEFENDANTS' FIRST SET OF REQUESTS FOR ADMISSIONS TO**  
9 **PLAINTIFF ANTONIO WILLIAMS**

10 TO: Antonio Williams, *Plaintiff Pro Per*

11 In accordance with FRCP 36, Defendants, the Las Vegas Metropolitan Police Department  
12 (the "Department" or "LVMPD"), Sheriff Joseph Lombardo ("Lombardo"), Andrew Bauman  
13 ("Bauman"), Matthew Kravetz ("Kravetz"), Supreet Kaur ("Kaur"), David Jeong ("Jeong"), and  
14 Theron Young ("Young"), collectively ("LVMPD Defendants"), by and through its attorneys,  
15 Marquis Aurbach, hereby requests that Plaintiff Antonio Williams ("Williams") respond in  
16 writing and under oath, and serve upon the undersigned counsel for LVMPD Defendants, within  
17 thirty (30) days of the date of service thereof, his responses to the Requests for Admissions set  
18 forth below.

19 **REQUESTS**

20 **REQUEST NO. 1:**

21 Admit that possession of marijuana is a federal offense.

22 **REQUEST NO. 2:**

23 Admit that consuming marijuana is a federal offense.

24 **REQUEST NO. 3:**

25 Admit that you were in possession of marijuana during the time period discussed in the  
26 First Amended Complaint ("FAC") while you were in Room 2037 at the Rio.

27 **REQUEST NO. 4:**

28 Admit that you were consuming marijuana during the time period discussed in the FAC  
while you were in Room 2037 at the Rio.

MARQUIS AURBACH  
1000 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

1 **REQUEST NO. 5:**

2 Admit that you refused to leave Room 2037 upon request by the Rio Hotel and Casino  
3 security on August 18, 2019.

4 **REQUEST NO. 6:**

5 Admit you were arrested during the time period discussed in the FAC.

6 **REQUEST NO. 7:**

7 Admit that the LVMPD Defendants did not conspire together to violate your civil rights.

8 **REQUEST NO. 8:**

9 Admit that LVMPD does have a procedure to enable each person involved in a search  
10 and seizure the right to file a grievance to contest illegal acts and acts motivated by bias.

11 **REQUEST NO. 9:**

12 Admit that LVMPD does have clear and consistent discipline parameters in the event a  
13 grievance is sustained.

14 **REQUEST NO. 10:**

15 Admit that photographs of you at the Rio Hotel and Casino were posted to social media  
16 on August 18, 2019.

17 **REQUEST NO. 11:**

18 Admit that videos of you at the Rio Hotel and Casino were posted to social media on  
19 August 18, 2019.

20 Dated this 16th day of March, 2022.

21 MARQUIS AURBACH

22 By: /s/ Jackie V. Nichols

23 Craig R. Anderson, Esq.

24 Nevada Bar No. 6882

25 Jackie V. Nichols, Esq.

26 Nevada Bar No. 14246

27 10001 Park Run Drive

28 Las Vegas, Nevada 89145

Attorneys for Defendants Las Vegas

Metropolitan Police Department, Sheriff Joseph  
Lombardo, Andrew Bauman, Matthew Kravetz,  
Supreet Kaur, David Jeong, and Theron Young

## **EXHIBIT B**

**Declaration of Jackie V. Nichols, Esq.**

**DECLARATION OF JACKIE V. NICHOLS, ESQ. IN SUPPORT OF LVMPD**  
**DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED**  
**COMPLAINT PURSUANT TO RULES 37(d) AND 41(b) FOR ANTONIO WILLIAMS**

JACKIE V. NICHOLS, ESQ., declares as follows:

1. I am over the age of 18 years and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.

2. I am duly licensed to practice law in the State of Nevada and have personal knowledge of and I am competent to testify concerning the facts herein.

3. I make this declaration in support of LVMPD Defendants' Motion to Dismiss Plaintiffs' First Amended Complaint Pursuant to Rules 37(d) and 41(b) for Antonio Williams ("Motion") in the matter *Connie Semper, et al. v. Las Vegas Metropolitan Police Department, et al.*, in the United States District Court, District of Nevada, Case No.: 2:20-cv-01875-JCM-EJY.

4. I am the attorney for Defendants, the Las Vegas Metropolitan Police Department (the “Department” or “LVMPD”), Andrew Bauman (“Bauman”), Matthew Kravetz (“Kravetz”), Supreet Kaur (“Kaur”), David Jeong (“Jeong”), and Theron Young (“Young”), collectively (“LVMPD Defendants”) in the above-referenced matter.

5. On March 16, 2022, my office served First Set of Interrogatories and Request for Admissions on Plaintiff through his prior counsel. *See Exhibit A* to Motion.

6. I served counsel because that was the last provided address in Plaintiffs' disclosures made pursuant to Fed. R. Civ. P. 26.

7. Plaintiff's prior counsel indicated to me that he subsequently provided the discovery requests to Plaintiff.

8. My office never received responses to the discovery requests.

9. On February 3, 2023, I followed up on the outstanding discovery requests. See **Exhibit C** to Motion.

10. I did not receive any discovery responses or a response to my letter.

11. Thereafter, I noticed Plaintiff's deposition. *See Exhibit D to Motion.*

12. Plaintiff did not appear for the noticed deposition. *See Exhibit E to Motion.*

13. At no point since counsel's withdrawal of representation has Plaintiff communicated with me.

Pursuant to NRS § 53.045, I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Dated this 4th day of April, 2023.

/s/ Jackie V. Nichols  
JACKIE V. NICHOLS, ESQ.

**MARQUIS AURBACH**  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

# **EXHIBIT C**

**Letter**



DIRECT LINE: (702) 207-6091  
DIRECT FAX: (702) 382-5816  
EMAIL: JNICHOLS@MACLAW.COM

ALBERT G. MARQUIS  
PHILLIP S. AURBACH  
AVECE M. HIGBEE  
SCOTT A. MARQUIS  
CRAIG R. ANDERSON  
TERRY A. MOORE  
GERALDINE TOMICH  
NICHOLAS D. CROSBY  
TYE S. HANSEEN  
DAVID G. ALLEMAN  
CODY S. MOUNTER  
CHAD F. CLEMENT  
CHRISTIAN T. BALDUCCI  
BRIAN R. HARDY  
JORDAN B. PEEL  
JARED M. MOSER  
JACKIE V. NICHOLS

COLLIN M. JAYNE  
ALEXANDER K. CALAWAY  
HAYDEN R. D. SMITH  
DOMINIQUE BOSA-  
EDWARDS  
NICHOLAS J. KLEIN  
HARRY L. ARNOLD  
JORDAN W. MONTEL  
TRISHA R. DELOS SANTOS  
NICHOLAS M. ADAMS  
REAGAN A. WEBER  
W. REESE LEVINS

JOHN M. SACCO [RET.]  
LANCE C. EARL  
WILLIAM P. WRIGHT  
JENNIFER L. MICHELI  
OF COUNSEL

February 3, 2023

**Via U.S. Mail**

Antonio Williams  
3912 Red Trumpet Ct.  
North Las Vegas, Nevada 89081

Re: Phillip Semper, et al. v. LVMPD, et al  
Federal Court No. 2:20-cv-01875-JCM-EJY  
Our File No. 14687-296

Dear Mr. Williams:

Please be advised this office represents Defendants Las Vegas Metropolitan Police Department, Sheriff Joseph Lombardo, Andrew Bauman, Matthew Kravetz, Supreet Kaur, David Jeong, and Theron Young (collectively, "Defendants") in federal case number 2:20-cv-01875-JCM-EJY. Please direct any communications regarding this matter to the undersigned counsel.

You have been given two (2) separate requests of written discovery to which you are legally obligated to provide good-faith answers. See Fed. R. Civ. P. 33, 34, and 36. Both of these requests are attached as **Exhibit 1**. Those requests for written discovery include requests for admissions and interrogatories. As of February 2, 2023, you have failed to complete either of the referenced requests for written discovery that were sent out nearly a year ago on or about March 16, 2022.

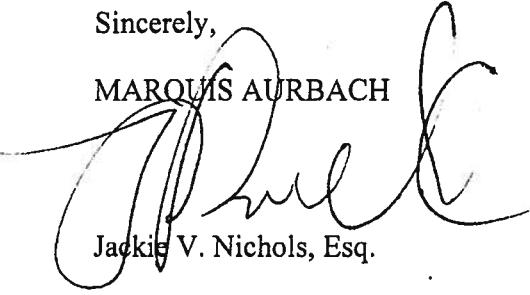
Because of your refusal to cooperate with written discovery, we must schedule a meet and confer to remedy these missing, yet essential, components of litigation. This conference will be tentatively scheduled for **February 16, 2023 at 2:30 p.m.** Please call my direct line 702-207-6091. In the event that you do not participate in the meet and confer process, we will seek a motion to compel your discovery responses, as well as our attorney's fees and costs associated with the motion.

February 3, 2023  
Page 2

Last, please provide us with your availability for your deposition, where we will be asking you questions regarding the matter, and you will be answering under oath.

Sincerely,

MARQUIS AURBACH

  
Jackie V. Nichols, Esq.

JVN:rw

MAC:14687-296 4978745\_1

# **EXHIBIT D**

## **Deposition Notice**

1                   **Marquis Aurbach**  
2                   Craig R. Anderson, Esq.  
3                   Nevada Bar No. 6882  
4                   Jackie V. Nichols, Esq.  
5                   Nevada Bar No. 14246  
6                   10001 Park Run Drive  
7                   Las Vegas, Nevada 89145  
8                   Telephone: (702) 382-0711  
9                   Facsimile: (702) 382-5811  
10                  canderson@maclaw.com  
11                  jinchols@maclaw.com

7 Attorneys for Defendants Las Vegas Metropolitan Police Department, Andrew Bauman, Matthew Kravetz, Supreet Kaur, David Jeong, and Theron Young

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

10 CONNIE SEMPER<sup>1</sup>, an individual; ASHLEY  
11 MEDLOCK, an individual; LONICIA BOWIE,  
12 an individual; MICHAEL GREEN, an  
individual; CLINTON REECE, an individual;  
13 COREY JOHNSON, an individual; DEMARLO  
14 RILEY, an individual; CORY BASS, an  
individual; CARLOS BASS, an individual;  
BREANNA NELLUMS, an individual; and  
ANTONIO WILLIAMS, an individual,

Case Number:  
2:20-cv-01875-JCM-EJY

**LVMPD DEFENDANTS' NOTICE OF  
TAKING DEPOSITION OF PLAINTIFF  
ANTONIO WILLIAMS**

15 Plaintiffs,

16 |

17 LAS VEGAS METROPOLITAN POLICE  
18 DEPARTMENT, in its official capacity;  
19 ANDREW BAUMAN, individually and in his  
20 capacity as a Las Vegas Metropolitan Police  
21 Department Officer; DAVID JEONG,  
22 individually and in his capacity as a Las Vegas  
23 Metropolitan Police Department Officer;  
24 SUPREET KAUR, individually and in his  
capacity as a Las Vegas Metropolitan Police  
Department Officer; MATTHEW KRAVETZ,  
individually and in his capacity as a Las Vegas  
Metropolitan Police Department Officer; and  
THERON YOUNG, individually and in his  
capacity as a Las Vegas Metropolitan Police  
Department Officer,

## Defendants.

<sup>1</sup> Pursuant to FRCP 25, Ms. Semper has been substituted for Phillip Semper pursuant to this court's order date January 13, 2022, as she is the executrix of his estate.

1 **LVMPD DEFENDANTS' NOTICE OF TAKING DEPOSITION OF PLAINTIFF**  
2 **ANTONIO WILLIAMS**

3 PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil  
4 Procedure, Defendants, the Las Vegas Metropolitan Police Department (the "Department" or  
5 "LVMPD"), Andrew Bauman ("Bauman"), Matthew Kravetz ("Kravetz"), Supreet Kaur  
6 ("Kaur"), David Jeong ("Jeong"), and Theron Young ("Young"), collectively ("LVMPD  
7 Defendants"), by and through their attorneys, Marquis Aurbach, will take the deposition of  
8 Plaintiff Antonio Williams upon oral examination **on the 15th day of March, 2023 at the hour**  
9 **of 11:00 a.m.**, before a Notary Public, or before some other officer authorized by law to  
10 administer oaths. The deposition will take place at Marquis Aurbach located at 10001 Park Run  
11 Drive, Las Vegas, Nevada 89145.

12 The deposition will be recorded by stenographic means, and oral examination will  
13 continue from day to day until completed. You are invited to attend and cross-examine.

14 Dated this 27th day of February, 2023.

15 MARQUIS AURBACH

16  
17 By: /s/ Jackie V. Nichols  
18 Craig R. Anderson, Esq.  
19 Nevada Bar No. 6882  
20 Jackie V. Nichols, Esq.  
21 Nevada Bar No. 14246  
22 10001 Park Run Drive  
Las Vegas, Nevada 89145  
Attorneys for Defendants Las Vegas  
Metropolitan Police Department, Andrew  
Bauman, Matthew Kravetz, Supreet Kaur,  
David Jeong, and Theron Young

MARQUIS AURBACH  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

**CERTIFICATE OF MAILING**

2 I hereby certify that on the 27th day of February, 2023, I served a copy of the foregoing  
3 **LVMPD DEFENDANTS' NOTICE OF TAKING DEPOSITION OF PLAINTIFF**  
4 **ANTONIO WILLIAMS** upon each of the parties by depositing a copy of the same in a sealed  
5 envelope in the United States Mail, Las Vegas, Nevada, First-Class Postage fully prepaid, and  
6 addressed to:

Christopher M. Peterson, Esq.

Sophia Romero, Esq.

Sadmira Ramic, Esq.

American Civil Liberties Union of Nevada  
601 South Rancho Drive, Suite B-11  
Las Vegas, Nevada 89106

Las Vegas, Nevada 89106  
Attorneys for Plaintiffs Connie Denise Semper,  
as Special Administrator for the Estate of Phillip  
Semper, Corey Johnson, Ashley Medlock,  
Michael Green, Demarlo Riley, Clinton Reece,  
and Lonicia Bowie

Carlos Bass  
2621 Sommer Ct.  
North Las Vegas, Nevada 89032  
*Plaintiff Pro Per*

Breanna Nellums  
4012 Warm Hearted Ct.  
North Las Vegas, Nevada 89032  
*Plaintiff Pro Per*

Robert L. Langford, Esq.

Matthew J. Rashbrook, Esq.

Robert L. Langford & Associates  
1925 Village Center Circle, Suite 15  
Las Vegas, Nevada 89134

Las Vegas, Nevada 89134  
Attorneys for Plaintiffs Connie Denise  
Semper, as Special Administrator for the  
Estate of Phillip Semper, Corey Johnson,  
Ashley Medlock, Michael Green, Demarlo  
Riley, Clinton Reece, and Lonica Bowie

Cory Bass  
2621 Sommer Ct.  
Las Vegas, Nevada 89032  
*Plaintiff Pro Per*

Antonio Williams  
3912 Red Trumpet Ct.  
North Las Vegas, Nevada 89081-4023  
*Plaintiff Pro Per*

and that there is a regular communication by mail between the place of mailing and the place(s) so addressed.

/s/ Krista Busch  
An employee of Marquis Aurbach Coffing

## **EXHIBIT E**

**Transcript of Non-Appearance of Antonio  
Williams**

Antonio Williams  
Semper, et al. vs LVMPD, et al.

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3  
4 CONNIE SEMPER, an individual; )  
5 ASHLEY MEDLOCK, an individual; )  
6 LONICIA BOWIE, an individual; )  
7 MICHAEL GREEN, an individual; ) Case No. 2:20-cv-  
8 CLINTON REECE, an individual; ) 01875-JCM-EJY  
9 COREY JOHNSON, an individual; )  
DEMARLO RILEY, an individual; )  
CORY BASS, an individual; CARLOS )  
BASS, an individual; BREANNA )  
NELLUMS, an individual; and )  
ANTONIO WILLIAMS, an individual, )  
 )  
10 Plaintiffs, )  
 )  
11 vs. )  
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SCHEDULED DEPOSITION OF ANTONIO WILLIAMS

STATEMENT OF NON-APPEARANCE

19 Taken at the Offices of Marquis Aurbach  
20 10001 Park Run Drive  
Las Vegas, Nevada

21 On Wednesday, March 15, 2023  
At 11:14 a.m.  
22  
23

24 Reported by: Jane V. Efaw, CCR #601, RPR  
25

Antonio Williams  
Semper, et al. vs LVMPD, et al.

2..5

1     LAS VEGAS METROPOLITAN POLICE     )...

2     DEPARTMENT, in its official     )

3     capacity; ANDREW BAUMAN,     )

4     individually and in his capacity     )

5     as a Las Vegas Metropolitan     )

6     Police Department Officer; DAVID     )

7     JEONG, individually and in his     )

8     capacity as a Las Vegas     )

9     Metropolitan Police Department     )

10     Officer; SUPREET KAUR,     )

11     individually and in his capacity     )

12     as a Las Vegas Metropolitan     )

13     Police Department Officer;     )

14     MATTHEW KRAVETZ, individually     )

15     and in his capacity as a Las     )

16     Vegas Metropolitan Police     )

17     Department Officer; and THERON     )

18     YOUNG, individually and in his     )

19     capacity as a Las Vegas     )

20     Metropolitan Police Department     )

21     Officer,     )

22     )     

23     Defendants.     )

24     )

25     

14     Appearances:

15     For the Plaintiffs:

16         CHRISTOPHER M. PETERSON, ESQ. (By Zoom)

17         American Civil Liberties Union of Nevada

18         601 South Rancho Drive

19         Suite B-11

20         Las Vegas, Nevada 89106

21         (702) 366-1902

22         peterson@aclunv.org

23     For the Defendants:

24         JACKIE V. NICHOLS, ESQ.

25         Marquis Aurbach

26         10001 Park Run Drive

27         Las Vegas, Nevada 89145

28         (702) 382-0711

29         jnjichols@maclaw.com

30     \* \* \* \* \*

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4	ANTONIO WILLIAMS			2 STATE OF NEVADA )
5	Statement by Ms. Nichols	4		3 SS:
6				4 COUNTY OF CLARK. )
7				5 I, Jane V. Efaw, certified shorthand
8				6 reporter, do hereby certify that I took down in
9				7 shorthand (Stenotype) all of the proceedings had in
10	Exhibit 1 LVMFD Defendants' Notice of Taking Taking Deposition of Plaintiff Antonio Williams	4		8 the before-entitled matter at the time and place
11				9 indicated; and that thereafter said shorthand notes
12				10 were transcribed into typewriting at and under my
13				11 direction and supervision and the foregoing
14				12 transcript constitutes a full, true and accurate
15				13 record of the proceedings had.
16				14 IN WITNESS WHEREOF, I have hereunto affixed
17				15 my hand this 21 day of March, 2023.
18				
19				19 Jane V. Efaw, CCR #601
20				20
21				21
22				22
23				23
24				24
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Antonio Williams  
Semper, et al. vs LVMPD, et al.

1

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		phone	

1                   **Marquis Aurbach**  
2                   Craig R. Anderson, Esq.  
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12                  Attorneys for Defendants Las Vegas Metropolitan Police Department, Andrew Bauman,  
13                  Matthew Kravetz, Supreet Kaur, David Jeong, and Theron Young

14                  **UNITED STATES DISTRICT COURT**

15                  **DISTRICT OF NEVADA**

16                  CONNIE SEMPER<sup>1</sup>, an individual; ASHLEY  
17                  MEDLOCK, an individual; LONICIA BOWIE,  
18                  an individual; MICHAEL GREEN, an  
19                  individual; CLINTON REECE, an individual;  
20                  COREY JOHNSON, an individual; DEMARLO  
21                  RILEY, an individual; CORY BASS, an  
22                  individual; CARLOS BASS, an individual;  
23                  BREANNA NELLUMS, an individual; and  
24                  ANTONIO WILLIAMS, an individual,

25                  Case Number:  
26                  2:20-cv-01875-JCM-EJY

27                  **LVMPD DEFENDANTS' NOTICE OF**  
28                  **TAKING DEPOSITION OF PLAINTIFF**  
29                  **ANTONIO WILLIAMS**

**MARQUIS AURBACH**  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

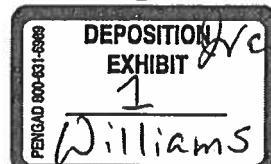
30                  Plaintiffs,

31                  vs.

32                  LAS VEGAS METROPOLITAN POLICE  
33                  DEPARTMENT, in its official capacity;  
34                  ANDREW BAUMAN, individually and in his  
35                  capacity as a Las Vegas Metropolitan Police  
36                  Department Officer; DAVID JEONG,  
37                  individually and in his capacity as a Las Vegas  
38                  Metropolitan Police Department Officer;  
39                  SUPREET KAUR, individually and in his  
40                  capacity as a Las Vegas Metropolitan Police  
41                  Department Officer; MATTHEW KRAVETZ,  
42                  individually and in his capacity as a Las Vegas  
43                  Metropolitan Police Department Officer; and  
44                  THERON YOUNG, individually and in his  
45                  capacity as a Las Vegas Metropolitan Police  
46                  Department Officer,

47                  Defendants.

48                  <sup>1</sup> Pursuant to FRCP 25, Ms. Semper has been substituted for Phillip Semper pursuant to this court's order  
49                  date January 13, 2022, as she is the executrix of his estate.



**LVMPD DEFENDANTS' NOTICE OF TAKING DEPOSITION OF PLAINTIFF  
ANTONIO WILLIAMS**

3 PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil  
4 Procedure, Defendants, the Las Vegas Metropolitan Police Department (the "Department" or  
5 "LVMPD"), Andrew Bauman ("Bauman"), Matthew Kravetz ("Kravetz"), Supreet Kaur  
6 ("Kaur"), David Jeong ("Jeong"), and Theron Young ("Young"), collectively ("LVMPD  
7 Defendants"), by and through their attorneys, Marquis Aurbach, will take the deposition of  
8 Plaintiff Antonio Williams upon oral examination on the 15th day of March, 2023 at the hour  
9 of 11:00 a.m., before a Notary Public, or before some other officer authorized by law to  
10 administer oaths. The deposition will take place at Marquis Aurbach located at 10001 Park Run  
Drive, Las Vegas, Nevada 89145.

The deposition will be recorded by stenographic means, and oral examination will continue from day to day until completed. You are invited to attend and cross-examine.

Dated this 27th day of February, 2023.

## MARQUIS AURBACH

By: /s/ Jackie V. Nichols  
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Nevada Bar No. 6882  
Jackie V. Nichols, Esq.  
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10001 Park Run Drive  
Las Vegas, Nevada 89145  
Attorneys for Defendants Las Vegas  
Metropolitan Police Department, Andrew  
Bauman, Matthew Kravetz, Supreet Kaur,  
David Jeong, and Theron Young

**CERTIFICATE OF MAILING**

I hereby certify that on the 27th day of February, 2023, I served a copy of the foregoing  
**LVMPD DEFENDANTS' NOTICE OF TAKING DEPOSITION OF PLAINTIFF**  
**ANTONIO WILLIAMS** upon each of the parties by depositing a copy of the same in a sealed  
envelope in the United States Mail, Las Vegas, Nevada, First-Class Postage fully prepaid, and  
addressed to:

Christopher M. Peterson, Esq.

**Sophia Romero, Esq.**  
**Sadmira Ramic, Esq.**

Sadmina Ramic, Esq.  
American Civil Liberties Union of Nevada  
601 South Rancho Drive, Suite B-11  
Las Vegas, Nevada 89106  
Attorneys for Plaintiffs Connie Denise Semper  
Special Administrator for the Estate of Philip  
Semper, Corey Johnson, Ashley Medlock,  
Michael Green, Demarlo Riley, Clinton Reece  
and Lonica Bowie

Carlos Bass  
2621 Sommer Ct.  
North Las Vegas, Nevada 89032  
*Plaintiff Pro Per*

Breanna Nellums  
4012 Warm Hearted Ct.  
North Las Vegas, Nevada 89032  
*Plaintiff Pro Per*

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Matthew J. Rashbrook, Esq.  
Robert L. Langford & Associates  
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Attorneys for Plaintiffs Connie Denise  
Semper, as Special Administrator for the  
state of Phillip Semper, Corey Johnson,  
Ashley Medlock, Michael Green, Demar  
Biley, Clinton Reece, and Lonicia Bowe

Cory Bass  
2621 Sommer Ct.  
North Las Vegas, Nevada 89032  
*Plaintiff Pro Per*

Antonio Williams  
3912 Red Trumpet Ct.  
North Las Vegas, Nevada 89081-4023  
*Plaintiff Pro Per*

and that there is a regular communication by mail between the place of mailing and the place(s) so addressed.

/s/ Krista Busch  
An employee of Marquis Aurbach Coffing