

1 CHRISTOPHER M. PETERSON

Nevada Bar No.: 13932

2 TATIANA R. SMITH

3 Nevada Bar No.: 16627

JACOB SMITH

4 Nevada Bar No.: 16324

AMERICAN CIVIL LIBERTIES

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16 *Attorneys for Plaintiffs*

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT COURT OF NEVADA**

19 LISA MCALLISTER, an individual;
20 BRANDON SUMMERS, an individual; and
21 JORDAN POLOVINA, an individual,

22 Plaintiffs,

23 vs.

24 CLARK COUNTY, a political subdivision of
25 the state of Nevada,

26 Defendant.

Case Number: 2:24-cv-00334

**NOTICE OF INTENT TO SERVE
SUBPOENAS FOR THE PRODUCTION
OF DOCUMENTS**

27 [SPACE INTENTIONALLY BLANK]
28

YOU ARE HEREBY NOTIFIED, pursuant to FRCP 45(a)(4), that plaintiffs intend to serve the attached subpoena for the production of documents upon the Las Vegas Metropolitan Police Department.

Dated: February 05, 2025.

/s/ Jacob Smith

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602 South Tenth Street

Las Vegas, NV 89101

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on February 05, 2025, I caused a true and correct copy of the foregoing Notice of Intent to Serve Subpoena to be served to all parties of record by serving Defendant, Clark County's attorney of record via:

- Electronic mail by sending a copy to Joel.Browning@clarkcountyanv.gov; and
- U.S. Mail, postage prepaid, to

Clark County District Attorney's Office
Civil Division
500 South Grand Central Pkwy., Suite 5075
Las Vegas, Nevada 89155-2215

/s/ Jacob Smith
An employee of the ACLU of Nevada

UNITED STATES DISTRICT COURT

for the

_____ District of _____

Plaintiff

v.

Defendant)
)
)
)
)
)
)

Civil Action No. _____

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To:

(Name of person to whom this subpoena is directed)

☐ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Place:

Date and Time:

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk_____
Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) _____
_____, who issues or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT A

McAllister, et al. v. Clark County

(Case No. 2:24-cv-00334)

DEFINITIONS

1. Notwithstanding ANY definition set forth below, each word, term, or phrase used in the Requests is intended to have the broadest meaning permitted under the Federal Rules of Civil Procedure.

2. “ANY” and “ALL” may be used interchangeably herein and mean “ANY,” “ALL,” “each and every,” as well as “anyone.”

3. “COMMUNICATION” and “COMMUNICATIONS” means ANY transmission, conveyance, or exchange of information, whether by oral, written, printed, recorded, filmed, electronic, or other means, Including, discussions, conversations, interviews, negotiations, e-mails, facsimile transmissions, letters, confirmations, telephonic conversations, correspondence, notes, memorandum, advertisement, or other forms of written or verbal discourse, however transmitted.

4. “COMPLAINT” means the controlling COMPLAINT filed by McAllister and Summers, and served upon Clark County, in the United States District Court for the District of Nevada, Case No.:24-cv-00334-JAD-NJK.

5. “DEFENDANT” shall mean DEFENDANT(s) named in the COMPLAINT in the above-captioned action, including Clark County and those PERSONS yet to be identified who are similarly liable.

6. “DEFINE” or “DEFINING” means to explicitly state or explain the meaning of a word or phrase. This includes fixing or establishing boundaries or limits on the meaning of the word or phrase.¹

¹ Define, *Black’s Law Dictionary* (12th ed. 2024).

1 7. “DESCRIBE” or “DESCRIBING” means to set forth a complete and detailed
2 statement of ALL information, circumstances, and FACTS that refer to, RELATE TO, reflect,
3 comprise, or bear upon the matter CONCERNING which information is requested.

4 8. “DOCUMENT” and “DOCUMENTS” shall have the broadest meaning accorded
5 by Rule 34(a) of the Federal Rules. Therefore, “DOCUMENT” and “DOCUMENTS” shall
6 include, without limitation, ALL of the matters defined in Rule 1001 of the Federal Rules of
7 Evidence, COMMUNICATIONS (as defined herein), memoranda, stenographic or handwritten
8 notes, drafts, studies, publications, invoices, ledgers, journals, books, records, accounts,
9 pamphlets, voice recordings, photographs, reports, surveys, statistical compilations, work papers,
10 data processing cards, computer tapes or printouts, microfiche or microfilm, and writings of every
11 other kind and character, whether originals or reproductions.

12 The terms “DOCUMENT” and “DOCUMENTS” also include every copy where such copy
13 is not an identical reproduction of the original or where such copy contains ANY commentary,
14 marginal comment, or notation whatsoever that does not appear in the original.

15 The terms “DOCUMENT” and “DOCUMENTS” also mean and include ANY printed,
16 typewritten, or handwritten matter of reproduction thereof of whatever character, or means or
17 electronic storage of information, such as e-mail, that is within YOUR possession, control, or
18 custody.

19 The terms “DOCUMENT” and “DOCUMENTS” also include ALL drafts. Without
20 limitation of the term “control,” a DOCUMENT is deemed to be within YOUR control if YOU
21 have ownership, possession, or custody of the DOCUMENT or a copy thereof, or the right to secure
22 the DOCUMENT or a copy thereof, from ANY other PERSON or public or private entity having
23 physical possession thereof.

24 If ANY DOCUMENT requested herein was, but is no longer, subjected to YOUR control,
25 please state what disposition was made of it, and the date or dates, or the approximate date or dates,
26 of such disposition without limitation, ANY electronic or computerized compilation. A non-
27 identical copy is a separate DOCUMENT within the meaning of this term. “DOCUMENT” and
28

1 “DOCUMENTS” shall also include ANY and ALL data compilations from which information can
2 be obtained.

3 9. “FACTS” refer to anything that actually exists, including but not limited to tangible
4 things, actual occurrences, relationships, events, and states of mind such as intentions and
5 opinions.²

6 10. “IDENTIFY” when referring to: (1) a natural PERSON, means that (a) PERSON’S
7 full name, (b) present or last known business address (including street name and number, city or
8 town, state, zip code), telephone number, and e-mail address, (c) present or last known place of
9 employment and title, (d) present or last known residential address (including street name and
10 number, city or town, state, zip code) and telephone number; and (2) a PERSON other than a
11 natural PERSON (i.e., an entity), means its (a) full name and type of organization, and (b) the
12 address of its principal place of business (including street name and number, city or town, state,
13 zip code), and telephone number. Once a PERSON has been identified in accordance with this
14 subparagraph, only the name of that PERSON need be listed in response to subsequent discovery
15 requesting the identification of that PERSON.

16 11. “IDENTIFY” when referring to a DOCUMENT, whether or not such
17 DOCUMENT is presently in existence or YOUR possession, means to state, to the extent known,
18 (a) type of DOCUMENT (e.g., letter, memorandum, e-mail); (b) general subject matter of the
19 DOCUMENT; (c) the date the DOCUMENT bears or bore or, if undated, the date on which it was
20 created; (iv) the Identity of ANY PERSON who authored it or participated in the creation of it; (d)
21 the Identity of ANY PERSON who received the DOCUMENT or a copy thereof; (e) the Identity
22 of ANY PERSON having custody of or access to the original and/or ANY copy thereof; (f) the
23 Bates or production number the DOCUMENT bears if the DOCUMENT has already or is being
24 produced; (g) if the DOCUMENT is not presently in existence, a description of ANY basis for the
25 destruction or disposal of the DOCUMENT, the date of such destruction or disposal, and the
26 Identity of ANY PERSON who participated in its destruction or disposal; and (h) if YOU do not
27

28 ² Fact, *Black’s Law Dictionary* (12th ed. 2024).

1 know whether the DOCUMENT is presently in existence because the DOCUMENT is not
2 presently in YOUR possession, the Identity of ANY PERSON now in possession the
3 DOCUMENT and/or ANY copy thereof.

4 12. "IDENTIFY" when referring to a COMMUNICATION, whether or not such
5 COMMUNICATION presently exists in recorded form, to state, or provide DOCUMENTS that
6 set forth, (a) the method by which the COMMUNICATION was transmitted, sent, conveyed,
7 exchanged, or received; (b) the nature, content, and substance of the COMMUNICATION; (c) the
8 date, time, and place when and where the COMMUNICATION took place; and (d) the Identity of
9 ANY PERSON who transmitted, sent, conveyed, exchanged, received, or participated in the
10 COMMUNICATION, Including ANY witness to the COMMUNICATION.

11 13. "IDENTIFY" when referring to a THING, whether or not such THING is presently
12 in existence or YOUR possession, to state, or provide DOCUMENTS that set forth, (a) a
13 description of the nature of, type of, and use(s) for the THING; (b) the THING's model, serial,
14 part, item, product, catalog, and/or manufacturer's number(s); (c) the date when the THING came
15 into existence; (d) the date when the THING came into YOUR Possession; (e) the reason(s) for
16 which YOU developed, designed, created, manufactured, purchased, or acquired the THING; (f)
17 the Identity of ANY PERSON who used, developed, designed, created, manufactured, purchased,
18 or acquired, the THING; (g) if the THING is not presently in existence, a description of ANY basis
19 for the destruction or disposal of the THING, the date of such destruction or disposal, and the
20 Identity of ANY PERSON who participated in its destruction or disposal; and (h) if YOU do not
21 know whether the THING is presently in existence because the THING is not presently in YOUR
22 possession, the Identity of ANY PERSON now in possession the THING.

23 14. "LAS VEGAS STRIP" shall mean the portion of Las Vegas Boulevard between
24 West Russell Road and Sahara Avenue.

25 15. "LVMPD" shall mean the Las Vegas Metropolitan Police Department, located at
26 400 S. Martin L. King Boulevard, Las Vegas, Nevada, 89106.

1 16. “PEDESTRIAN BRIDGE” means an overpass used exclusively by pedestrians
2 connecting adjoining buildings along the LAS VEGAS STRIP. These are the same PEDESTRIAN
3 BRIDGES referred to in the Clark County Code § 16.13.030.

4 17. “PERSON” and “PERSONS” means ANY natural PERSON, corporation,
5 partnership, proprietorship, association, joint venture, group, governmental or public entity, or
6 ANY other form or organization of legal entity, and ALL of their directors, officers, employees,
7 representatives, or agents.

8 18. “PLAINTIFFS” shall mean PLAINTIFFS(s) named in the COMPLAINT in the
9 above-captioned action and those PERSONS yet to be identified who are similarly situated.

10 19. “POLICY” or “POLICIES” means any guideline, policy, practice, or procedure,
11 including formal and informal, whether written or oral, implemented by YOU or DEFENDANT
12 in order to carry out the work of DEFENDANT.

13 20. “RELATE TO,” “RELATED TO,” “RELATING TO,” “IN RELATION TO,”
14 “RELATE,” “RELATES,” and “RELATED” means comprising, mentioning, describing,
15 underlying, containing, enumerating, involving, regarding, or in ANY way CONCERNING,
16 identified in, pertaining, corresponding, or referring to, being connected with, reflecting on or
17 resulting from, in whole or in part, directly or indirectly, the stated subject matter.

18 21. “RELEVANT PERIOD” shall refer to the period from January 1, 2014, through
19 present day.

20 22. “RESORT CORRIDOR” shall be the same as that provided by Clark County Code
21 § 16.13.020.

22 23. “TRAINING” means any instruction, directive, or guidance, both formal and
23 informal, whether written or oral, given to or conducted by YOU or law enforcement with regard
24 to procedures, policies, and practices.

1 24. “THING” means ANY tangible THING that is not a DOCUMENT, including ANY
2 product, model, machine, device, apparatus, tool, component part, assembly or subassembly, and
3 ANY portion thereof.

4 25. “YOU” or “YOUR” shall mean LVMPD.

5 **INSTRUCTIONS**

6 1. Each request shall be construed and answered separately and shall not be combined
7 for the purpose of supplying a common response thereto. When a request has several parts, each
8 part shall be answered separately. Each answer shall set forth verbatim the Request to which it
9 responds. The answer to a request shall not be supplied by referring to the answer to another
10 request, unless the request referred to supplies a complete and accurate answer to the request being
11 answered. The specificity of ANY request shall not be construed or understood as limiting the
12 generality or breadth of ANY other request.

13 2. As used in these requests, and as necessary to bring within the scope of ANY
14 request DOCUMENTS or information that might otherwise be construed to be outside the scope,
15 (a) the connectors “and” and “or” shall be construed both conjunctively and disjunctively, (b) the
16 terms “ANY” and “ALL” shall be construed as “ANY and ALL,” (c) the singular of ANY word
17 shall include the plural and vice versa, and (d) the use of ANY verb in ANY tense shall be
18 construed as the use of that verb in ALL other tenses.

19 3. If YOU object to ANY request, state in full the basis for YOUR objection. If YOU
20 object to part of a request, specify the portion of the request to which YOU object and answer so
21 much of the request as is not objectionable. If ANY of the requests cannot be answered in full,
22 answer to the extent possible, specifying the reasons for the inability to answer the remainder.

23 4. Information requested in these requests shall include information within the
24 knowledge or possession of LMVPD, as defined herein, as well as ANY additional PERSONS,
25 firms, or entities directly or indirectly subject to YOUR control in ANY way whatsoever.

26 5. Unless otherwise stated, each request refers to the time period of January 1, 2014,
27 through present day (the RELEVANT PERIOD).
28

1 6. The requests are continuing in nature. Please supplement YOUR responses in the
2 event that ANY of YOUR answers change or vary after the time of YOUR original response.

3 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

4 **REQUEST FOR PRODUCTION NO. 1:**

5 ALL DOCUMENTS RELATED TO the following LVMPD event numbers:

- 6 1. LLV240200044159
- 7
- 8 2. LLV240200048290
- 9
- 10 3. LLV240200067320
- 11
- 12 4. LLV240200081576
- 13
- 14 5. LLV240200089635
- 15
- 16 6. LLV240200104919
- 17
- 18 7. LLV240300004054
- 19
- 20 8. LLV240300018035
- 21
- 22 9. LLV240300087607
- 23
- 24 10. LLV240300104307
- 25
- 26 11. LLV240300116034
- 27
- 28 12. LLV240400007574
13. LLV240400011750
14. LLV240400029988
15. LLV240400047410
16. LLV240400090966
17. LLV240400107051
18. LLV240400112524
19. LLV240500015764

1 20. LLV240500069975
2 21. LLV240500107584
3 22. LLV240600025278
4 23. LLV240600036436
5 24. LLV240600083356
6 25. LLV240600087122
7 26. LLV240600098989
8 27. LLV240700001847
9 28. LLV240700010922
10 29. LLV240700021834
11 30. LLV240700025999
12 31. LLV240700044736
13 32. LLV240700091820
14 33. LLV240800003279
15 34. LLV240800005608
16 35. LLV240800036881
17 36. LLV240800053423
18 37. LLV240800057733
19 38. LLV240800076352
20 39. LLV240800098899
21 40. LLV240800114877
22 41. LLV240800119195
23 42. LLV240900001406
24 43. LLV240900030994
25
26
27
28

1 44. LLV240900054509

2 45. LLV240900078210

3 46. LLV240900087887

4 47. LLV240900097245

5 48. LLV241000046482

6 49. LLV241000047317

7 50. LLV241000060412

8 51. LLV241000106121

9 52. LLV241100003359

10 53. LLV241100031773

11 54. LLV241100081397

12 55. LLV241100104545

13 56. LLV241200023122

14 57. LLV241200104255

15
16
17 **REQUEST FOR PRODUCTION NO. 2:**

18 ALL DOCUMENTS RELATED TO YOUR POLICIES RELATED TO Clark County
19 Code Chapter 16.13.
20

21 **REQUEST FOR PRODUCTION NO. 3:**

22 ALL DOCUMENTS RELATED TO YOUR TRAININGS RELATED TO Clark County
23 Code Chapter 16.13.
24

25 **REQUEST FOR PRODUCTION NO. 4:**

26 ALL DOCUMENTS RELATED TO YOUR efforts RELATED TO lobby, provide
27 testimony on, and/or pass Clark County Code Chapter 16.13 and any RELATED bills.
28

1 **REQUEST FOR PRODUCTION NO. 5:**

2 ALL DOCUMENTS RELATED TO YOUR POLICIES RELATED TO Clark County
3 Code Chapter 16.11.

4 **REQUEST FOR PRODUCTION NO. 6:**

5 ALL DOCUMENTS RELATED TO YOUR TRAININGS on Clark County Code Chapter
6 16.11.

7 **REQUEST FOR PRODUCTION NO. 7:**

8 ALL DOCUMENTS RELATED TO situations in which pedestrians were obstructed on a
9 PEDESTRIAN BRIDGE.

10 **REQUEST FOR PRODUCTION NO. 8:**

11 ALL COMMUNICATIONS between YOU and DEFENDANT RELATED TO Clark
12 County Code Chapter 16.13.

13 **REQUEST FOR PRODUCTION NO. 9:**

14 ALL COMMUNICATIONS between YOU and the Nevada Resort Association including
15 COMMUNICATIONS between YOU and anyone representing the Nevada Resort Association
16 and/or any agent of the Nevada Resort Association RELATED TO Clark County Code Chapter
17 16.13.

18 **REQUEST FOR PRODUCTION NO. 10:**

19 ALL COMMUNICATIONS between YOU and DEFENDANT RELATED TO Clark
20 County Code Chapter 16.11.

21 **REQUEST FOR PRODUCTION NO. 11:**

22 ALL COMMUNICATIONS between YOU and Dr. William H. Sousa.
23
24
25
26
27
28

1 **REQUEST FOR PRODUCTION NO. 12:**

2 ALL DOCUMENTS RELATED TO how YOU monitor instances of criminal disorder on
3 PEDESTRIAN BRIDGES and grade-level sidewalks.

4 **REQUEST FOR PRODUCTION NO. 13:**

5 ALL DOCUMENTS RELATED TO how YOU monitor crimes on PEDESTRIAN
6 BRIDGES and grade-level sidewalks.

7 **REQUEST FOR PRODUCTION NO. 14:**

8 ALL DOCUMENTS DESCRIBING how YOU determine the difference between “calls
9 for law enforcement services” and “service calls for disorderly offenses” as the terms are used in
10 Clark County Code § 16.13.010.
11

12 **REQUEST FOR PRODUCTION NO. 15:**

13 ALL DOCUMENTS sufficient to identify the difference between “calls for law
14 enforcement services” and “service calls for disorderly offenses” as the terms are used in Clark
15 County Code § 16.13.010.
16

17 **REQUEST FOR PRODUCTION NO. 16:**

18 ALL DOCUMENTS RELATED TO service calls for “disorderly offenses” in the
19 RESORT CORRIDOR, as used in Clark County Code § 16.13.010.

20 **REQUEST FOR PRODUCTION NO. 17:**

21 ALL DOCUMENTS RELATED TO “chronic offender(s),” as stated by Sheriff Kevin
22 McMahon in his interview for the article Police won’t stop photos on Strip bridges under the new
23 law, sheriff says with the Las Vegas Review-Journal published on January 17, 2024.
24

25 **REQUEST FOR PRODUCTION NO. 18:**

26 ALL DOCUMENTS including the any of the following keywords:

- 27 • “resort corridor” AND “captive audience”
- 28 • “resort corridor” AND “pedestrian bridge”

- “resort corridor” AND “flow zone”
- “Sousa”
- “16.13.030”
- “Chapter 16.13”

REQUEST FOR PRODUCTION NO. 19:

ALL DOCUMENTS RELATED TO the enforcement of Clark County Code Chapter 16.11, including but not limited to citations, criminal complaints, arrest reports, and arrest declarations.

REQUEST FOR PRODUCTION NO. 20:

ALL DOCUMENTS RELATED TO citations, criminal complaints, arrest reports, and arrest declarations that occurred on the PEDESTRIAN BRIDGES from January 1, 2021, through December 31, 2023.

REQUEST FOR PRODUCTION NO. 21:

ALL DOCUMENTS RELATED TO citations, criminal complaints, arrest reports, and arrest declarations that occurred with the RESORT CORRIDOR from January 1, 2021, through December 31, 2023.

REQUEST FOR PRODUCTION NO. 22:

ALL DOCUMENTS RELATED TO data collected by YOU RELATED TO Clark County Code Chapter 16.13.

REQUEST FOR PRODUCTION NO. 23:

ALL DOCUMENTS RELATED TO data collected by YOU RELATED TO PEDESTRIAN BRIDGES.

1 **REQUEST FOR PRODUCTION NO. 24:**

2 ALL DOCUMENTS RELATED TO data collected by YOU on PEDESTRIAN
3 BRIDGES, including but not limited to citations, criminal complaints, arrest reports, and arrest
4 declarations.
5

6 **REQUEST FOR PRODUCTION NO. 25:**

7 ALL DOCUMENTS RELATED TO First Amendment activities, including but not limited
8 to solicitation, panhandling, protesting, expressive conduct, musical performances, street
9 performing, busking, tabling, amplified sound, handbilling, picketing, proselytizing, or preaching
10 on the PEDESTRIAN BRIDGES.
11

12 **REQUEST FOR PRODUCTION NO. 26:**

13 ALL DOCUMENTS RELATED TO First Amendment activities, including but not limited
14 to solicitation, panhandling, protesting, expressive conduct, musical performances, street
15 performing, busking, tabling, amplified sound, handbilling, picketing, proselytizing, or preaching
16 in the RESORT CORRIDOR.
17

18 DATED February 05, 2025.
19

20 /s/ Jacob Smith

21 CHRISTOPHER M. PETERSON, Nevada Bar No.: 13932

22 TATIANA R. SMITH, Nevada Bar No.: 16627

23 JACOB SMITH, Nevada Bar No.: 16324

ACLU OF NEVADA

24 MARGARET A. MCLETCHIE, Nevada Bar No. 10931

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27
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