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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
the state of Nevada,

25 Defendant.

26 Case Number: 2:24-cv-00334

27
28 **NOTICE OF INTENT TO SERVE
SUBPOENAS FOR THE PRODUCTION
OF DOCUMENTS**

[SPACE INTENTIONALLY BLANK]

1 YOU ARE HEREBY NOTIFIED, pursuant to FRCP 45(a)(4), that plaintiffs intend to serve
2 the attached subpoena for the production of documents upon Dr. William H. Sousa.
3

4 Dated: February 05, 2025.

5 /s/ Jacob Smith
6

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23 Las Vegas, NV 89101
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25 *Attorneys for Plaintiffs*
26

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@clarkcountydav.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, 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.

27
28

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 Clark County in
12 order to carry out the work of Clark County.

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.

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

25. "YOU" or "YOUR" shall mean Dr. William H. Sousa.

26. "FINAL SOUSA REPORT" shall mean the document attached hereto as Exhibit A titled "QUESTIONS RELATED TO PUBLIC SAFETY ON PEDESTRIAN BRIDGES."

INSTRUCTIONS

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

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

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

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

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

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

5 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

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

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

9 **REQUEST FOR PRODUCTION NO. 2:**

10 ALL COMMUNICATIONS between YOU and anyone else RELATED TO the FINAL
11 SOUSA REPORT and drafts thereof.

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

13 ALL COMMUNICATIONS between YOU and DEFENDANT RELATED TO the FINAL
14 SOUSA REPORT and drafts thereof.

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

16 ALL COMMUNICATIONS between YOU and DEFENDANT RELATED TO the
17 PEDESTRIAN BRIDGES.

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

19 ALL COMMUNICATIONS between YOU and DEFENDANT RELATED TO public
20 safety on the pedestrian bridges.

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

22 ALL COMMUNICATIONS between YOU and DEFENDANT RELATED TO Clark
23 County Code Chapter 16.13 and/or any prior versions of this code.

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

2 ALL COMMUNICATIONS between YOU and LVMPD RELATED TO public safety on
3 the pedestrian bridges.

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

5 ALL DOCUMENTS RELATED TO the FINAL SOUSA REPORT.

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

7 ALL DOCUMENTS YOU relied upon for the FINAL SOUSA REPORT.

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

9 ALL DOCUMENTS and COMMUNICATIONS RELATED TO how YOU obtained data
10 for the FINAL SOUSA REPORT.

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

12 ALL DOCUMENTS RELATED TO data received, reviewed, and/or collected by YOU
13 RELATED TO PEDESTRIAN BRIDGES including information not referenced within the FINAL
14 SOUSA REPORT.

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

16 ALL DOCUMENTS DEFINING and/or reflecting the meaning of the following terms as
17 they are used in the FINAL SOUSA REPORT:

18

- 20 • Disorder
- 21 • Captive audience
- 22 • Aggressive panhandlers
- 23 • Aggressive street performers

24
25
26
27
28 [INTENTIONALLY BLANK]

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

2 ALL DOCUMENTS YOU referenced when creating the stat sheet (CC138-139) within the
3 FINAL SOUSA REPORT

4

5 DATED February 05, 2025.

6

7 */s/ Jacob Smith*

8 CHRISTOPHER M. PETERSON, Nevada Bar No.: 13932
9 TATIANA R. SMITH, Nevada Bar No.: 16627
10 JACOB SMITH, Nevada Bar No.: 16324
11 **ACLU OF NEVADA**

12 MARGARET A. MCLETCHIE, Nevada Bar No. 10931
13 LEO S. WOLPERT, Nevada Bar No. 12658
14 **MCLETCHIE LAW**

15 *Attorneys for Plaintiffs*