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**Exhibit 1**

**Deposition of William H.**

**Sousa**

McAllister et al., vs Clark County, et al.

Deposition of  
**WILLIAM H. SOUSA**

*April 29, 2025*



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William H. Sousa

McAllister et al., vs Clark County, et al.

UNITED STATES DISTRICT COURT

DISTRICT COURT OF NEVADA

LISA MCALLISTER, an )  
individual; BRANDON )  
SUMMERS, an individual; )  
and JORDAN POLOVINA, an ) CASE NO.  
individual, ) 2:24-cv-00334  
)  
Plaintiffs, )  
)  
vs. )  
)  
CLARK COUNTY, political )  
subdivision of the state )  
of Nevada, )  
)  
Defendant. )  
)

DEPOSITION OF WILLIAM H. SOUSA

Taken on Tuesday, April 29, 2025

At 8:51 a.m.

At 4362 W. Cheyenne Avenue

North Las Vegas, Nevada 89032

Reported by: JoAnn Melendez, CCR 370

1 of 2022 to -- yes, for that purpose. The actual  
2 agreement developed a little bit later, but yes.

3 Q. Now, prior to that in July of 2022, you  
4 were contacted by Mitch Langberg; is that correct?

5 A. Correct.

6 Q. Is your understanding that he was  
7 contacting you on behalf of the Nevada Resort  
8 Association?

9 A. That's my understanding.

10 Q. Now, is it correct that in July of 2022  
11 he stated he wanted to engage you and Professor  
12 Harold to work on supporting the stopping and  
13 standing ban ordinance; is that correct?

14 A. Yes.

15 Q. To your knowledge, did the NRA engaging  
16 professor Harold on this project?

17 A. No.

18 Q. Do you know why?

19 A. Well, neither of us were engaged by the  
20 NRA. After that initial conversation, Tamara, Dr.  
21 Harold, was just unable to commit to any engagement  
22 at that point.

23 Q. Do you know why?

24 A. Yes.

25 Q. Can you tell me why?

William H. Sousa

McAllister et al., vs Clark County, et al.

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## CERTIFICATE OF WITNESS

PAGE	LINE	CHANGE	REASON
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\* \* \* \* \*

I, William H. Sousa, Jr., witness herein, do hereby certify and declare under penalty of perjury that the within and foregoing transcript, including any corrections stated above, is a true and correct transcription of my testimony contained therein; that I have read, corrected and do hereby affix my signature to said deposition taken on Tuesday, April 29, 2025.

Executed this                      day of                      2025,  
at                      .  
(City/State)

William H. Sousa, Jr., Witness

## CERTIFICATE OF REPORTER

STATE OF NEVADA       )  
                                  SS:  
COUNTY OF CLARK       )

I, JoAnn Melendez, Certified Court Reporter in the State of Nevada, do hereby certify:  
That I reported the taking of the deposition of the witness, William H. Sousa, Jr., commencing on Tuesday, April 29, 2025, at 8:51 a.m.

That prior to being examined, the witness was by me duly sworn to testify to the truth.

That the foregoing transcript is a true, complete, and accurate transcription of the stenographic notes of the testimony taken by me in the matter entitled herein to the best of my knowledge, skill, and ability.

That prior to the completion of the proceedings, the reading and signing of the transcript was requested by the witness or a party.

I further certify that I am not a relative or employee of an attorney or counsel of any of the parties, nor a relative or employee of an attorney or counsel involved in said action, nor a person financially interested in the action.

IN WITNESS WHEREOF, I have hereunto set my hand in my office in the County of Clark, State of Nevada, this 22nd day of May 2025.



JoAnn Melendez, CCR 370

## **Exhibit 2**

# **Defendant Clark County's Responses to Plaintiffs' Third Set of Request for Admission, Request for Admission No. 38**



STEVEN B. WOLFSON  
District Attorney  
**CIVIL DIVISION**  
Bar No. 1565  
By: **JOEL K. BROWNING**  
Senior Deputy District Attorney  
Bar No. 14489  
By: **TIMOTHY ALLEN**  
Deputy District Attorney  
State Bar No. 14818  
500 South Grand Central Pkwy., Suite 5075  
Las Vegas, Nevada 89155-2215  
Telephone (702) 455-4761  
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E-Mail: [Joel.Browning@ClarkCountyDA.com](mailto:Joel.Browning@ClarkCountyDA.com)  
E-Mail: [Timothy.Allen@ClarkCountyDA.com](mailto:Timothy.Allen@ClarkCountyDA.com)  
*Attorneys for Defendant Clark County*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LISA MCALLISTER, an individual; and  
BRANDON SUMMERS, an individual;  
JORDAN POLOVINA, an individual,

Plaintiffs,

vs.

CLARK COUNTY, a political subdivision  
of the state of Nevada.

Defendant(s).

Case No: 2:24-cv-00334

**DEFENDANT CLARK COUNTY'S  
RESPONSES TO PLAINTIFFS'  
THIRD SET OF REQUESTS FOR  
ADMISSION**

TO: Plaintiff LISA MCALLISTER; and

TO: Plaintiff BRANDON SUMMERS; and

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

TATIANA R. SMITH, Nevada Bar No. 16627

**AMERICAN CIVIL LIBERTIES UNION OF NEVADA; and**

MARGARET A. MCLETCHE, Nevada Bar No. 10931

LEO S. WOLPERT, Nevada Bar No. 12658

**MCLETCHE LAW,**

Plaintiff's counsel of record.

COMES NOW, Defendant CLARK COUNTY (hereinafter "Defendant"), through its  
attorney STEVEN B. WOLFSON, District Attorney, and by JOEL K. BROWNING, Senior

1 Deputy District Attorney, and TIMOTHY ALLEN, Deputy District Attorney, and hereby  
2 responds and objects to PLAINTIFFS' THIRD SET OF REQUESTS FOR ADMISSION,  
3 pursuant to the requirements of NRCp 36, as follows:

4 **REQUEST FOR ADMISSION NO. 38:**

5 Admit that the Nevada Resort Association referred Dr. William H. Sousa to YOU to  
6 carry out the study that is the subject of Dr. Sousa's Expert Report attached as Exhibit A to  
7 Defendant Clark County's Initial Expert Disclosures submitted by YOU in this case.

8 **RESPONSE TO REQUEST ADMISSION NO. 38:**

9 Objection. The instant Request is vague and ambiguous as it pertains to the term  
10 "Nevada Resort Association" as the Nevada Resort Association is a non-sentient organization.  
11 Without waiving the foregoing objections and subject to the same, Clark County responds as  
12 follows:

13 Clark County admits that Dr. William Sousa was referred by Mitch Langberg, Esq.,  
14 formerly of Brownstein Hyatt Farber Schreck and retained by Nevada Resort Association, to  
15 the County to perform the study that is the subject of Dr. Sousa's Expert Report attached as a  
16 portion of Exhibit A to Defendant Clark County's Initial Expert Disclosures.

17 DATED this 24th day of December, 2025.

18 STEVEN B. WOLFSON  
19 DISTRICT ATTORNEY

20 By: /s/ Joel K. Browning  
21 JOEL K. BROWNING  
22 Deputy District Attorney  
23 Bar No. 14489  
24 TIMOTHY ALLEN  
25 Deputy District Attorney  
26 Bar No. 14818  
27 500 South Grand Central Pkwy., Suite 5075  
28 Las Vegas, Nevada 89155-2215  
*Attorneys for Defendant*

**CERTIFICATE OF ELECTRONIC SERVICE**

I hereby certify that I am an employee of the Office of the Clark County District Attorney and that on this 24th day of December, 2025, I served a true and correct copy of the foregoing **DEFENDANT CLARK COUNTY’S RESPONSES TO PLAINTIFFS’ THIRD SET OF REQUESTS FOR ADMISSION** (United States District Court Pacer System or the Eighth Judicial District Wiznet), by e-mailing the same to the following recipients. Service of the foregoing document by e-mail is in place of service via the United States Postal Service.

Christopher M. Peterson  
Tatiana R. Smith  
AMERICAN CIVIL LIBERTIES  
UNION OF NEVADA  
4362 W. Cheyenne Ave.  
North Las Vegas, NV 89032  
*Attorney for Plaintiffs*  
[Peterson@aclunv.org](mailto:Peterson@aclunv.org)  
[tsmith@aclunv.org](mailto:tsmith@aclunv.org)  
[jsmith@aclunv.org](mailto:jsmith@aclunv.org)

Margaret A. McLetchie  
Leo S. Wolpert  
MCLECHIE LAW  
602 South Tenth Street  
Las Vegas, NV 89101  
*Attorney for Plaintiffs*  
[efile@nvlitigation.com](mailto:efile@nvlitigation.com)  
[maggie@nvlitigation.com](mailto:maggie@nvlitigation.com)  
[leo@nvlitigation.com](mailto:leo@nvlitigation.com)

/s/Renee S. Albert  
An Employee of the Clark County District  
Attorney’s Office – Civil Division

**Exhibit 3**

**Email exchange between**

**Virginia Valentine to**

**Lisa Logsdon, CC**

**348684–686**

**From:** [Langberg, Mitchell](#)  
**To:** [Lisa Logsdon](#)  
**Cc:** [Liesl Freedman](#); [Virginia Valentine](#)  
**Subject:** Re: Pedestrian Flow ordinance  
**Date:** Thursday, December 28, 2023 8:38:40 AM

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**CAUTION:** This email originated from an **External Source**. Please **use caution** before opening attachments, clicking links, or responding to this email. **Do not sign-in with your DA account credentials.**

Yep. Give me a couple of minutes.

...

On Dec 28, 2023, at 8:37 AM, Lisa Logsdon  
<[Lisa.Logsdon@clarkcountyda.com](mailto:Lisa.Logsdon@clarkcountyda.com)> wrote:

Thanks – can you please send me the language?

---

**From:** Liesl Freedman <[L8706F@LVMPD.COM](mailto:L8706F@LVMPD.COM)>  
**Sent:** Thursday, December 28, 2023 8:35 AM  
**To:** Virginia Valentine <[valentine@nevadaresorts.org](mailto:valentine@nevadaresorts.org)>; Lisa Logsdon  
<[Lisa.Logsdon@clarkcountyda.com](mailto:Lisa.Logsdon@clarkcountyda.com)>  
**Cc:** [mlangberg@bhfs.com](mailto:mlangberg@bhfs.com)  
**Subject:** Re: Pedestrian Flow ordinance

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Thank you.

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**From:** Virginia Valentine <[valentine@nevadaresorts.org](mailto:valentine@nevadaresorts.org)>  
**Sent:** Thursday, December 28, 2023 8:33:47 AM  
**To:** Liesl Freedman <[L8706F@LVMPD.COM](mailto:L8706F@LVMPD.COM)>; Lisa Logsdon  
<[Lisa.Logsdon@clarkcountyda.com](mailto:Lisa.Logsdon@clarkcountyda.com)>  
**Cc:** [mlangberg@bhfs.com](mailto:mlangberg@bhfs.com) <[mlangberg@bhfs.com](mailto:mlangberg@bhfs.com)>  
**Subject:** Re: Pedestrian Flow ordinance

**CAUTION:** This email originated from an **External Source**. Please **use caution** before opening attachments, clicking links, or responding to this email. **Do not sign-in with your LVMPD account credentials.**

Paul More has informed us that the union will not oppose the ordinance with Mitch's

amended language.

Thank you for your time, guidance, and input.

On Dec 26, 2023, at 1:08 PM, Lisa Logsdon  
<[Lisa.Logsdon@clarkcountyda.com](mailto:Lisa.Logsdon@clarkcountyda.com)> wrote:

I am available anytime tomorrow. Thanks Lisa

On Dec 26, 2023, at 2:59 PM, Virginia Valentine  
<[Valentine@nevadaresorts.org](mailto:Valentine@nevadaresorts.org)> wrote:

**CAUTION:** This email originated from an **External Source**. Please **use caution** before opening attachments, clicking links, or responding to this email. **Do not sign-in with your DA account credentials.**

Lisa and Liesl,

We've run in to some complications with Paul More's interpretations of the ordinance. Do you have time to jump on a call today or tomorrow, or your first available time?

Thank you,  
Virginia

Virginia Valentine  
President & CEO  
Nevada Resort Association  
10000 W. Charleston Blvd.  
Suite 165  
Las Vegas, NV 89135  
Ph: 702-735-4888  
<http://www.nevadaresorts.org/>  
<image001.jpg>

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## **Exhibit 4**

**Email from Lisa Logsdon to  
Joel Browning, forwarding  
email from Virginia Valentine,  
CC 385911–915**



**From:** [Lisa Logsdon](#)  
**To:** [Jeffrey Rogan](#); [Joel Browning](#)  
**Subject:** FW: Bridge Ordinance - Legal Discussion  
**Date:** Thursday, February 22, 2024 4:45:00 PM  
**Importance:** High

---

Also, here is the NRA's attorney to the Culinary Union.

---

**From:** Virginia Valentine  
**Sent:** Tuesday, December 12, 2023 4:29 PM  
**To:** Ted Pappageorge ; pmore@msh.law  
**Cc:** mlangberg@bhfs.com; Lisa Logsdon  
**Subject:** Bridge Ordinance - Legal Discussion  
**Importance:** High

**CAUTION:** This email originated from an **External Source**. Please **use caution** before opening attachments, clicking links, or responding to this email. **Do not sign-in with your DA account credentials.**

Ted and Paul,

Below is the legal discussion on the pedestrian bridge ordinance. Please consider this confidential.  
Look forward to our call on Thursday.

Virginia

Virginia Valentine

President & CEO

Nevada Resort Association

10000 W. Charleston Blvd.

Suite 165

Las Vegas, NV 89135

Ph: 702-735-4888

<http://www.nevadaresorts.org/>



---

### **Legal Discussion – Pedestrian Bridge Ordinance**

The proposed Clark County pedestrian flow zone ordinance (the "Ordinance") is consistent with established Ninth Circuit authority that pertains to regulations that do not target First Amendment activity but may have an impact on the time, place or manner of First Amendment activity.

Understandably, it is important to everyone that the Ordinance is drafted so that it accomplishes the legitimate and important purposes driving its enactment (which implicate safety for workers, tourists, entertainers, and homeless people, alike) and meets applicable legal standards (to protect, among other things, First Amendment rights).

The Ordinance does not present the issues that exist in "homeless sweep" cases such as the 2022 Federal District Court case, *Coal. on Homelessness v. City & Cnty. of San Francisco*, 647 F. Supp. 3d 806 (N.D. Cal. 2022) ("*COH*"). Notably, this case is not binding precedent and is currently on appeal. *COH* is a trial court order granting a preliminary injunction. In the order, the court sets out the current standards that apply to government action that is targeted to clearing homeless people from public areas. Notably, *COH* was not a challenge to any particular law. Instead, it was a challenge to the way existing laws and policy were enforced in San Francisco. Further, the challenges were not

based on the First Amendment. Rather, the primary challenges argued that imposing penalties on homeless people “for the involuntary act of sleeping outside” violated the Eighth Amendment prohibition on cruel and unusual punishment **and** that the confiscation and destruction of homeless persons’ property was a violation of the Fourth Amendment prohibition on unreasonable searches and seizures.

For context, the San Francisco Police Department issued a bulletin that described four categories of existing laws that the City could enforce to address homeless encampments, including laws that prohibit sitting, lying, and lodging, as well as those that restrict encampments on public sidewalks. However, in order to act consistent with binding precedent protecting homeless people who have no alternate place to go, the bulletin provided that these laws could only be enforced after law enforcement secured and offered appropriate shelter or a “navigation center bed.” Under the terms of the bulletin, if there was no alternative available, no citation could be issued.

Plaintiffs claimed that the laws were being enforced against homeless people who had no alternatives. Plaintiffs claimed that the City was enforcing the laws against people who had not alternatives because, among other things, there was a shortage of available shelter beds in the City. Plaintiffs sought a preliminary injunction to prohibit the City from enforcing or threatening to enforce the laws (including by issuing “move along” instructions) unless and until unhoused residents had voluntary alternatives “such that they are not being punished for the involuntary state of homelessness.”

The standard for issuing a preliminary injunction does **not** require the plaintiff to demonstrate that they are more likely than not to prevail in the case. Only that there is a “fair chance of success” and, among other things, that the plaintiff is likely to suffer irreparable harm in the absence of an injunction. Courts apply a sliding scale—a stronger showing on one element (such as harm) may offset a weaker showing on another element.

In *COH*, the court was presented with undisputed evidence that there was a shortage of shelter beds. Though the City claimed it was not engaging in enforcement action until it complied with the bulletin by offering shelter before requiring any unhoused person to vacate public property, the court concluded that the City’s evidence was unconvincing because there was substantial evidence offered by plaintiffs showing direct violation of that policy. Ultimately, plaintiffs were not asserting that any law or official policy was invalid. Rather, they challenged the unconstitutional manner of enforcement that did not comply with the policy. The *COH* court noted that the Ninth Circuit has “made clear” that a city is not required to “allow anyone who wishes to sit, lie, or sleep on the streets...at any time and at any place.” The prohibition is against “prosecuting homeless people for sleeping in public if” there are more homeless individuals in the jurisdiction than there are shelter spaces.

But, here, the Ordinance is not an effort to criminalize sleeping in public. It is not that broad insofar as it does not govern any area other than the pedestrian bridges. And, it is not so targeted as it is not focused on homeless people who are sleeping in public. Rather, it governs anyone who stops on the bridges. Thus, the Ordinance is neither targeted to “homeless sweeps,” nor does it violate the Ninth Circuit law that the *COH* court relied on. In *Martin* (the case the *COH* court primarily relied on), the ordinance at issue criminalized “the simple act of sleeping outside on public property.” *Martin v. City of Boise*, 920 F.3d 584, 617-18 (9th Cir. 2019). It prohibited people from lodging or sleeping “in **any** building, structure or place, whether public or private, without permission” or “any of the streets, sidewalks, parks or public places as a camping place at any time.” *Id.* (emphasis in original). This was

impermissible because, “[a]s long as the homeless plaintiffs do not have a single place where they can lawfully be, the challenged ordinances, as applied to them, effectively punish them for something for which they may not be convicted under the Eighth Amendment—sleeping eating and other innocent conduct.” *Id.* at 617 (cleaned up).

Here, the Ordinance neither deprives homeless people of a “single place where they can lawfully be, nor does it criminalize sleeping in public. The case authority on the issue of homeless sweeps is inapplicable.

More on point to the Ordinance is the recent Ninth Circuit case, *Camenzind v. California Exposition & State Fair*, 84 F.4th 1102, 1109 (9th Cir. 2023). This case pertained to restrictions on where First Amendment speech activities could be conducted at a fairground. As relevant to the Ordinance, the issue was whether restricting First Amendment activities to designated “free expression zones” near the entrance of a fairground was constitutionally permissible. The free expression zones were near the fairground entrance in designated 6 ft. x 6 ft. spaces that were available on a first come, first served basis. In a part of the opinion that is not relevant here, the court determined that the fairground, itself, was not a public forum. But, under California’s law, the area outside the grounds were a public forum.

Having determined the outside area to be a public forum, the *Camenzind* court identified the limitation at issue as a “time, place, or manner” regulation of speech. The court explained the well-settled standard: “In a public forum, the government may impose reasonable restrictions on the time, place, or manner of protected speech. Time, place, or manner regulations must be content neutral, narrowly tailored to serve a significant governmental interest, and leave open ample alternative channels for communication of the message.” *Id.* at 1114 (internal citations and quotations omitted). The court determined that the restrictions limiting the plaintiff’s activity to the free expression zones was constitutionally sound. The reasoning is particularly apropos:

“Camenzind concedes that the Free Expression Zones are content-neutral because they are allocated on a first-come, first-served basis. The zones also serve a substantial government interest: public safety. In the exterior area, pedestrian activity is generally confined to narrow walkways to and from the parking areas. The Free Speech Zones serve the substantial state interest of preventing congestion in that area by confining distribution, selling, and fund solicitation activities to fixed locations. From the Free Speech Zones, Camenzind would have been able to distribute his coins while not blocking the narrow walkways and causing attendees to stray into adjoining parking lots with automobile traffic. The zones are adequately tailored because they do not burden substantially more speech than is necessary to achieve the government's public-safety interest. The zones are positioned next to the entry gates—a prime location that provides speakers with exposure to virtually everyone who enters the fairgrounds. Camenzind points to nowhere in the exterior area that he would find preferable. We therefore conclude that Cal Expo's Free Expression Zones were a permissible regulation of the time, place, and manner of Camenzind's speech.” *Id.* (internal citations and quotations omitted).

Dr. Sousa’s report and other readily available information demonstrates that the government interest at stake with respect to the pedestrian bridges is stronger than in *Camenzind*. Addressing the same category of interest—safety—the bridges also present confined, narrow walkways. Here, they are the exclusive means of crossing Las Vegas Boulevard in many areas. Where the government interest in *Camenzind* appears to have been limited to the **anticipated** safety issues of congestion, the Sousa report reveals actual issues experienced on the bridges, including that disorder and crime have been statistically disproportionate on the bridges as compared to the rest of the sidewalk

system. There have been actual incidents of crowd surge during perceived emergencies on the bridges. And, like in *Camenzind*, there is the anticipation of serious safety issues that could occur if the use of the bridges is not confined to free-flowing pedestrian traffic. And, while the safety issues are obviously primary, the Ordinance serves additional government interests that are recognized to be sufficiently substantial to support time, place or manner restrictions on First Amendment Activity. For example, aesthetics have been recognized as a legitimate and substantial government interest. See, e.g., *Members of City Council v. Taxpayers for Vincent*, 466 U.S. 789, 805 (1984) (“[T]he state may legitimately exercise its police powers to advance esthetic values.”); *One World One Family Now v. City & County of Honolulu*, 76 F.3d 1009, 1013 (9th Cir.1996) (“[C]ities have a substantial interest in protecting the aesthetic appearance of their communities by ‘avoiding visual clutter.’”). Indeed, “municipalities have a weighty, essentially esthetic interest in proscribing intrusive and unpleasant formats for expression.” *Members of City Council of City of Los Angeles v. Taxpayers for Vincent*, 466 U.S. 789, 806 (1984). In *One World*, the Ninth Circuit endorsed three separate legitimate and substantial government interests, all of which are at issue here: “maintaining the aesthetic attractiveness” of the tourist area; “promoting public safety and the orderly movement of pedestrians;” and “protecting the local merchant economy.” *One World*, 76 F.3d at 1012. There can be no dispute about whether the Ordinance is content neutral. By its terms, it prohibits all stopping on the bridges. Unlike *Camenzind*, which prohibited First Amendment expression outside of the free expression zones, the Ordinance allows **moving** First Amendment activity on the bridges. The Ordinance does not discriminate based on viewpoint.

The Ordinance does not burden any more speech than is necessary. Again, it allows for **more** speech than in *Camenzind*. Further, like in that case, the limitations of the Ordinance allow ample alternative channels for communication. Indeed, whereas *Camenzind* was limited to small free expression zones, the Ordinance does not impact stationary First Amendment activity anywhere but on the bridges. Those who engage in such activity at the surface level sidewalks near the bridges will have “exposure to virtually everyone” who access the bridges. The required narrow tailoring of a government regulation does not require the restriction to be the least intrusive means of achieving the stated government interest. It is enough as long as it “promotes a substantial government interest that would be achieved less effectively absent the regulation’ and the regulation is not ‘substantially broader than necessary to achieve the government’s interest.’” *Honolulu Wkly., Inc. v. Harris*, 298 F.3d 1037, 1045 (9th Cir. 2002) (quoting *Ward v. Rock Against Racism*, 491 U.S. 781, 799–800 (1989)).

Any concerns about enforcement have been addressed by LVMPD. They are committed to applying the Ordinance equally to everyone. They have also made clear that their intent is to first request compliance by anybody that is violating the Ordinance—only escalating to citations when someone who had been informed about their obligation to keep moving is defiant and refuses.

Finally, the Ordinance will not have an improper impact on picketing activity protected under the National Labor Relations Act. The Ordinance does not purport to prevent protestors from carrying signs or marching because, by definition, marchers are moving. As in other contexts, picketing activity that results in obstructing or interfering with free ingress or egress on public sidewalks can be regulated. See *Cameron v. Johnson*, 390 U.S. 611, 625 (1968). Here, there is no issue unless picketing activity causes other people to stop on the bridge because it creates the conditions leading to the very safety issues that give rise to the Ordinance. The goal (and effect) of the Ordinance is not to inhibit picketing activity. In fact, much more restrictive laws that **target** picketing have been approved by the Ninth Circuit. For example, a San Diego ordinance that prohibited picketing withing

300 feet of a residential dwelling was found to meet the constitutional parameters of a time, place or manner restriction. *See Klein v. San Diego Cnty.*, 463 F.3d 1029, 1031 (9th Cir. 2006). The pedestrian bridge Ordinance is **less restrictive** because it does not prohibit picketing in any place. It only requires that such picketing not be stationary or cause other people to stop on the bridges. And even that limitation does not exist just below the bridges—much less than the 300 feet at issue in *Cameron*.

The Ordinance is carefully (and simply) crafted to: 1) not prohibit First Amendment activity, as long as it is moving, 2) ensure that any impact on First Amendment activity is limited, leaving ample opportunity for other First Amendment activity close to the bridges and with access to a nearly identical audience, 3) make the bridges safer for Strip workers and tourists, 4) make the bridges safer for entertainers, and 5) reduce the risk of serious harm in the event of an emergent crowd rush—which, incidentally, would be most dangerous to those that are sitting or lying on the bridges.

***Mitchell J. Langberg***

**Brownstein Hyatt Farber Schreck, LLP**

100 North City Parkway, Suite 1600

Las Vegas, NV 89106

702.464.7098 tel

[mlangberg@bhfs.com](mailto:mlangberg@bhfs.com)

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# **Exhibit 5**

## **Plaintiffs' Fourth Supplement to Initial Disclosures**

M  
d r  
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**AMER CAN C V L L BERT ES**  
**N N NEVADA**

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**MCLETTCH E LAW**  
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*Attorneys for Plaintiffs*

**N TED STATES D STR CT C RT**  
**D STR CT NEVADA**

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**Case. No. 2 24 c 334 JAD NJ**

**PLA NT S' RTH**  
**S PPLEMENT T N T AL**  
**D SCL S RES**

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. **P T E N T A L W T N E S S E S**

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**Plaintiffs**

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**Other Plaintiffs' Witnesses**

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**8. Samantha roner  
c o ACL of Ne ada  
4362 W. Cheyenne A e.  
North Las Vegas, Ne ada 89149**

Samantha Croner is expected to testify regarding her personal knowledge of the results and process of her in person investigation of first Amendment activity on multiple pedestrian bridges on June 28, 2025, and July 5, 2025.

9. Andrea Rios  
c/o ACL of Nevada  
4362 W. Cheyenne Ave.  
North Las Vegas, Nevada 89149

Andrea Rios is expected to testify regarding her personal knowledge regarding a stop and citation she received on the Pedestrian Bridges.

10. Alleciana Michele Mirabelli  
c/o Stephen Stubbs  
626 S. 3<sup>rd</sup> Street  
Las Vegas, Nevada 89101

Alleciana Michele Mirabelli is expected to testify regarding her personal knowledge regarding a stop and citation she received on the Pedestrian Bridges

Clark County Witnesses

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**Kimberly Horn**

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**The Nevada Resort Association Witnesses**

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**Las Vegas Metropolitan Police Department Witnesses**

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<b>imley Horn Signed 5.24.22 Professional Engineering Services Contract</b>	<b>M S 1325 – M S 1349</b>
<b>imley Horn Pedestrian Study Progress Reports</b>	<b>M S 135 – M S 135</b>
<b>imley Horn Count Location Pictures</b>	<b>M S 136 – M S 1392</b>
<b>imley Horn Count Location Maps</b>	<b>M S 1393 – M S 1398</b>
<b>imley Horn Handwritten Bridge Measurements</b>	<b>M S 1399 – M S 14</b>
<b>imley Horn Pedestrian Study Data Collection Training NP Descriptions</b>	<b>M S 141</b>
<b>imley Horn Pedestrian Volume Comparisons</b>	<b>M S 142 – M S 143</b>
<b>imely Horn Excel Calculations of NP Data</b>	<b>M S 144 – M S 1433</b>
<b>imley Horn NP Data Collection Maps</b>	<b>M S 1434 – M S 126</b>
<b>imley Horn NP Data Collection Training Agenda</b>	<b>M S 12</b>
<b>imley Horn NP Data Collection Training PowerPoint</b>	<b>M S 128 – M S 16</b>
<b>imley Horn NP Data Collection Maps blank</b>	<b>M S 161 – M S 12</b>
<b>imley Horn Email Correspondence Draft 2 22 Las Vegas Boulevard Pedestrian Study</b>	<b>M S 13 – M S 1</b>
<b>imley Horn Email Correspondence Data Collection follow up</b>	<b>M S 18 – M S 18</b>
<b>imley Horn Email Correspondence Pedestrian Study Camera Access</b>	<b>M S 188</b>
<b>imley Horn Email Correspondence Strip Pedestrian Study</b>	<b>M S 189 – M S 191</b>
<b>imley Horn 2 22 Pedestrian Study Draft Conclusions</b>	<b>M S 192 – M S 18</b>
<b>imley Horn Email Correspondence update on the 2 22 Clark County Pedestrian Study</b>	<b>M S 181</b>
<b>imley Horn Pedestrian Study Exhibit A</b>	<b>M S 182 – M S 185</b>
<b>imley Horn Pedestrian Study Exhibit A 16.13</b>	<b>M S 186 – M S 1811</b>
<b>imley Horn Pedestrian Study Exhibit B</b>	<b>M S 1812 – M S 182</b>

<b>imley Horn Pedestrian Study Exhibit C</b>	<b>M S 1821 – M S 1884</b>
<b>imley Horn Pedestrian Study Exhibit D</b>	<b>M S 1885</b>
<b>imley Horn Pedestrian low one Sign Mockup</b>	<b>M S 1886</b>
<b>imley Horn NP Data Collection Training PowerPoint 6.22</b>	<b>M S 188 – M S 1919</b>
<b>imley Horn Pedestrian Study Document Request Letter</b>	<b>M S 192</b>
<b>imley Horn Pedestrian and Mobile Billboard Study Letter</b>	<b>M S 1921</b>
<b>imley Horn inal 2 24 Pedestrian Study</b>	<b>M S 1922 – M S 2134</b>
<b>imley Horn Pedestrian Easements 1 of 2</b>	<b>M S 2135 – M S 2835</b>
<b>imley Horn Pedestrian Easements 2 of 2</b>	<b>M S 2836 – M S 2993</b>
<b>imley Horn Pedestrian Count Data folder</b>	<b>M S 2994</b>
<b>Recording Rios Stop on Pedestrian Bridge</b>	<b>M S 2995</b>
<b>BWC Polo ina Stop on Pedestrian Bridge</b>	<b>M S 2996</b>
<b>BWC Polo ina Stop on Pedestrian Bridge</b>	<b>M S 299</b>
<b>Summers mage Disclosures</b>	<b>M S 2998 – M S 3 8</b>
<b>Summers 6.29.2 19 Stop on Pedestrian Bridge</b>	<b>M S 3 9</b>
<b>Polo ina nstagram A</b>	<b>M S 3 1</b>
<b>Polo ina nstagram B</b>	<b>M S 3 11</b>
<b>Polo ina nstagram C</b>	<b>M S 3 12</b>
<b>Polo ina nstagram D</b>	<b>M S 3 13</b>
<b>Polo ina Video A</b>	<b>M S 3 14</b>
<b>Polo ina Video B</b>	<b>M S 3 15</b>
<b>Polo ina Video C</b>	<b>M S 3 16</b>
<b>Polo ina Video D</b>	<b>M S 3 1</b>
<b>Polo ina Video E</b>	<b>M S 3 18</b>
<b>Summers Video A</b>	<b>M S 3 19</b>
<b>Summers Video B</b>	<b>M S 3 2</b>
<b>Summers Video C</b>	<b>M S 3 21</b>
<b>Summers Video D</b>	<b>M S 3 22</b>
<b>Summers Video E</b>	<b>M S 3 23</b>
<b>Summers Video</b>	<b>M S 3 24</b>
<b>Summers Video</b>	<b>M S 3 25</b>
<b>Polo ina mage A</b>	<b>M S 3 26</b>
<b>Polo ina BWC 25 5 22 A</b>	<b>M S 3 2</b>
<b>Polo ina BWC 25 5 22 B</b>	<b>M S 3 28</b>
<b>Summers BWC 18 9 3 A</b>	<b>M S 3 29</b>
<b>Summers BWC 18 9 3 B</b>	<b>M S 3 3</b>
<b>Summers BWC 18 9 3 C</b>	<b>M S 3 31</b>
<b>Summers BWC 19 6 29</b>	<b>M S 3 32</b>
<b>Summers Police nteraction 13 14</b>	<b>M S 3 33</b>
<b>Summers Police nteraction 18 9 3 A</b>	<b>M S 3 34</b>
<b>Summers Police nteraction 18 9 3 B</b>	<b>M S 3 35</b>

<b>Summers Police nteraction 19 6 29</b>	<b>M S 3 36</b>
<b>Summers Police nteraction 19 1 5</b>	<b>M S 3 3</b>
<b>Summers Video 19 11 24 A</b>	<b>M S 3 38</b>
<b>Summers Video 19 11 24 B</b>	<b>M S 3 39</b>
<b>Polo ina Citation Packet 25 5 22</b>	<b>M S 3 4 – M S 3 46</b>
<b>Summers Citation Packet 11 3</b>	<b>M S 3 4 – M S 3 49</b>
<b>Summers Citation Packet 13 4 5</b>	<b>M S 3 5 – M S 3 52</b>
<b>Summers Citation Packet 13 14</b>	<b>M S 3 53</b>
<b>Summers Citation Packet 18 9 3</b>	<b>M S 3 54 – M S 3 56</b>
<b>Summers Citation Packet 19 6 29</b>	<b>M S 3 5 – M S 3 6</b>
<b>Summers Citation Packet 19 1 5</b>	<b>M S 3 61 – M S 3 63</b>
<b>Summers Citation Packet 19 11 24</b>	<b>M S 3 64 – M S 3 6</b>
<b>Summers CRB Complaint 18 9 3</b>	<b>M S 3 68 – M S 3</b>
<b>Documents produced by Third Party LVMPD</b>	<b>LVMPD 296</b> <b>LVMPD 596</b>

*Attorneys for Plaintiffs*

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**Exhibit 6**

**Defendant Clark County's  
Twenty-Fourth Supplemental  
Disclosure and Production of  
Documents and Witnesses Per  
FRCP 26(a)(1)**

STEVEN B. WOLFSON  
District Attorney  
**CIVIL DIVISION**  
Bar No. 1565  
By: **JOEL K. BROWNING**  
Deputy District Attorney  
Bar No. 14489  
By: **TIMOTHY ALLEN**  
Deputy District Attorney  
State Bar No. 14818  
500 South Grand Central Pkwy., Suite 5075  
Las Vegas, Nevada 89155-2215  
Telephone (702) 455-4761  
Fax (702) 382-5178  
E-Mail: [Joel.Browning@ClarkCountyDANV.gov](mailto:Joel.Browning@ClarkCountyDANV.gov)  
E-Mail: [Timothy.Allen@ClarkCountyDANV.gov](mailto:Timothy.Allen@ClarkCountyDANV.gov)  
*Attorneys for Defendant Clark County*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LISA MCALLISTER, an individual; and  
BRANDON SUMMERS, an individual,  
JORDAN POLOVINA, an individual,

Plaintiffs,

vs.

CLARK COUNTY, a political subdivision  
of the state of Nevada.

Defendant(s).

Case No: 2:24-cv-00334

**DEFENDANT CLARK COUNTY'S  
TWENTY-FOURTH  
SUPPLEMENTAL DISCLOSURE  
AND PRODUCTION OF  
DOCUMENTS AND WITNESSES  
PER FRCP 26(a)(1)**

COMES NOW Defendant CLARK COUNTY, through its attorney STEVEN B.  
WOLFSON, District Attorney, by JOEL K. BROWNING, Senior Deputy District Attorney  
and by TIMOTHY ALLEN, Deputy District Attorney hereby make its Twenty-Fourth  
Supplemental Disclosure and Production of Documents as required by Rule 26(a)(1) of the  
Federal Rules of Civil Procedure. New disclosure in **bold**.

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**List of Persons with knowledge:**

1  
2 1. Lisa McAllister, Plaintiff  
3 2. Brandon Summers, Plaintiff  
4 3. Jordon Polovina, Plaintiff  
5 c/o Christopher M. Peterson  
6 Tatiana R. Smith  
7 AMERICAN CIVIL LIBERTIES  
8 UNION OF NEVADA  
9 4362 W. Cheyenne Ave.  
10 North Las Vegas, NV 89032 702-366-1226

11 Margaret A. McLetchie  
12 Leo S. Wolpert  
13 MCLECHIE LAW  
14 602 South Tenth Street  
15 Las Vegas, NV 89101 702-728-5300

16 JORDAN POLOVINA, LISA McALLISTER and BRANDON SUMMERS, as the  
17 Plaintiffs, are expected to testify to each of their knowledge of the events described in the  
18 Complaint.

19 4. William H. Sousa, Ph.D., Professor and Director  
20 Criminal Justice Department  
21 University of Nevada Las Vegas  
22 4505 S. Maryland Parkway, Mail Code 5009  
23 Las Vegas, NV 89154 702-895-0247

24 WILLIAM H. SOUSA, Ph.D., as the writer of the report titled: *Questions Related to*  
25 *Public Safety on Pedestrian Bridges*, he is expected to testify regarding the findings  
26 documented in the above-referenced report.

27 5. Kaizad Yazdani, Deputy Director  
28 Clark County Public Works  
c/o Deputy District Attorney Joel K. Browning  
500 S. Grand Central Parkway, Suite 5075  
Las Vegas, NV 89155-2215 702-455-4761

KAIZAD YAZDANI, as a Deputy Director of Clark County Public Works, is  
expected to testify regarding the claims asserted in the Complaint, and to Clark County  
policies and procedures pertaining to this lawsuit.

6. Carlos Moreno Departmental Systems Administrator  
c/o Deputy District Attorney Joel K. Browning  
500 S. Grand Central Parkway, Suite 5075  
Las Vegas, NV 89155-2215 702-455-4761

CARLOS MORENO, as the Department System Administrator of Clark County Public Works, is expected to testify regarding the claims asserted in the Complaint, and to Clark County policies and procedures pertaining to this lawsuit.

7. FED R. CIV. P. 30(b)(6)  
CLARK COUNTY  
c/o Deputy District Attorney Joel K. Browning  
500 S. Grand Central Parkway, Suite 5075  
Las Vegas, NV 89155-2215 702-455-4761

The Fed R. 30 Civ. P. 30(b)(6) witness(es) representing Clark County are expected to testify to regarding the government interest underlying the enactment of Chapter 16.13 of the Clark County Code as determined from objective indicators like the face of the ordinance, facts surrounding the enactment of the ordinance, **the legislative history of the proposed amendment to Chapter 16.11 in 2022 and the enactment of 16.13 in 2024**, the stated effect of the ordinance, and the stated purpose of the ordinance.

8. FED R. CIV. P. 30(b)(6)  
Kimley-Horn  
c/o Nicole Thal, Esq.  
4637 Chabot Drive Suite 300 Pleasanton, CA 94588

The Fed R. 30 Civ. P. 30(b)(6) witness(es) representing Kimley-Horn is expected to testify to regarding the deposition testimony offered in this case on or around August 18, 2025, and the documents produced in response to the subpoena duces tecum served by Plaintiffs.

**Defendant CLARK COUNTY reserves the right to call any witnesses identified by the Plaintiff or any other party up to the time of trial.**

**Documents Produced Herewith:**

1. Certified copy of documentation regarding Board of County Commissioners Meeting, November 21, 2023, item number 68 with audio and video  
**CC 001 to CC 032**
2. Certified copy of documentation regarding Board of County Commissioners Meeting, December 5, 2023, item number 36 with audio and video  
**CC 033 to CC 070**

- 1 3. Certified copy of documentation regarding Board of County Commissioners  
2 Meeting, January 2, 2024, item number 38 with audio and video  
3 **CC 071 to CC 126**
- 4 4. Letter dated December 4, 2023, from Nevada Resort Association to the Board  
5 of County Commissioners  
6 **CC 127 to CC 131**
- 7 5. Report titled: *Questions Related to Public Safety on Pedestrian Bridges*  
8 **CC 132 to CC 139**
- 9 6. Amended Title 16 of the Clark County Code approved, January 2, 2024, to add  
10 Chapter 16.13  
11 **CC 140 to CC 145**
- 12 7. Lisa Logsdon's e-mails with attachment regarding Chapter 16.13  
13 **CC 146 to CC 252 (~~please see privilege log~~)**
- 14 8. 1994 Highway Capacity Manual Special Report 209  
15 **CC 253 to CC 823**
- 16 9. 1994 LV Boulevard S Pedestrian Walkway Study  
17 **CC 824 to CC 973**
- 18 10. 2012 Pedestrian Study Las Vegas Boulevard  
19 **CC 974 to CC 1163**
- 20 11. 2015.12.15 Las Vegas Boulevard Board Presentation  
21 **CC 1164 to CC 1206**
- 22 12. 2015 Pedestrian Study Las Vegas Boulevard Update  
23 **CC 1207 to CC 1383**
- 24 13. 1970 to 2023 Statistics Las Vegas Convention and Visitors Authority  
25 **CC 1384**
- 26 14. 2023 Pedestrian Bridge Maps  
27 **CC 1385 to CC 1389**
- 28 15. William H. Sousa Invoices  
**CC 1390 to CC 1396**
16. Agreement Between Clark County and Dr. Sousa for Public Safety and  
Disorder Analysis on Pedestrian Overpasses  
**CC 1394 to CC 1404**

17. Unofficial Transcript of Board of County Commissioners Meeting, January 2, 2024, item number 38  
**CC 1405 to CC 1418**
18. Certified copy of documentation regarding Board of County Commissioners Meeting, April 19, 2022, item number 59  
**CC 1419 to CC 1427**
19. Certified copy of documentation regarding Board of County Commissioners Meeting, May 3, 2022 item number 65 including video  
**CC 1428 to CC 1437**
20. Certified copy of documentation regarding Board of County Commissioners Meeting, June 21, 2022 item number 76  
**CC 1438 to CC 1446**
21. LVCVA Las Vegas Visitor Profile Study 2023  
**CC 1447 to CC 1499**
22. LVCVA Matrix of Las Vegas Visitor Segments 2023  
**CC 1500**
23. Excel Spreadsheet titled LVCVA Summary of Monthly Tourism Indicators for Las Vegas for calendar Year 2023  
**CC 1501**
24. Excel Spreadsheet titled LVCVA Summary of Monthly Tourism Indicators for Las Vegas for calendar Year 2024  
**CC 1502**
25. Transform Clark County Master Plan, adopted November 17, 2021  
**CC 1503 to CC 1724**
26. Appendices to Transform Clark County Master Plan  
**CC 1725 to CC 2078**
27. Certified copy of documentation regarding Board of County Commissioners Meeting, September 8, 1994, item number 18  
**CC 2079 to CC 2464**
28. Certified copy of documentation regarding Board of County Commissioners Meeting, April 15, 2008, item number 95  
**CC 2465 to CC 2470**

- 1 29. Certified copy of documentation regarding Board of County Commissioners  
2 Meeting, November 16, 2010, item number 56  
**CC 2471 to CC 2477**
- 3 30. Certified copy of documentation regarding Board of County Commissioners  
4 Meeting, April 19, 2016, item number 49  
**CC 2478 to CC 2492**
- 5 31. Certified copy of documentation regarding Board of County Commissioners  
6 Meeting, November 1, 2016, item number 32  
**CC 2493 to CC 2496**
- 7 32. Pedestrian Bridge and Sidewalk Exhibits provided by Clark County GIS  
8 **CC 2497 to CC 2515**
- 9 33. Pedestrian Bridge Plans for Flamingo provided by Clark County GIS  
10 **CC 2516 to CC 2657**
- 11 34. Pedestrian Bridge Plans for Harmon provided by Clark County GIS  
12 **CC 2658 to CC 2935**
- 13 35. Pedestrian Bridge Plans for Park provided by Clark County GIS  
14 **CC 2936 to CC 3086**
- 15 36. Pedestrian Bridge Plans for Spring Mountain provided by Clark County GIS  
16 **CC 3087 to 3281**
- 17 37. Pedestrian Bridge Plans for Tropicana provided by Clark County GIS  
18 **CC 3282 to CC 3910**
- 19 38. 66203 NOC Code for CCC 16.13.030  
**CC 3911 to CC 3912**
- 20 39. Justice Court Case Search for 66203 NOC Code (Redacted as to Private  
21 Personal Information of Non-Parties)  
**CC 3913 to CC 3930**
- 22 40. Litigation Hold Memo and Destruction Hold Order, dated 04.02.2024  
23 **CC 3931 to CC 3933**
- 24 41. Litigation Hold Memo and Destruction Hold Order, dated 09.24.2024  
25 **CC 3934 to CC 3940**
- 26 42. Certified copy of minutes for Board of County Commissioners Meeting,  
27 05.03.2022 item number 65  
28 **CC 3941 to CC 4029**

- 1 43. Criminal Legal Inquiry Result Report regarding Clark County Code 16.11.030  
2 **CC4030 to CC 4038**
- 3 44. Video of violinist Brandon Summers  
4 **CC 4039**
- 5 45. Video of violinist Brandon Summers  
6 **CC 4040**
- 7 46. Video of violinist Brandon Summers  
8 **CC 4041**
- 9 47. Video of violinist Brandon Summers  
10 **CC 4042**
- 11 48. Video of violinist Brandon Summers  
12 **CC 4043**
- 13 49. Video of Cellist Jordan Polovina  
14 **CC 4044**
- 15 50. Video of Cellist Jordan Polovina  
16 **CC 4045**
- 17 51. Video of Cellist Jordan Polovina  
18 **CC 4046**
- 19 52. Video of Cellist Jordan Polovina  
20 **CC 4047**
- 21 53. Screenshot of Cellist Jordan Polovina  
22 **CC 4048**
- 23 54. Clark County Pedestrian Study, Las Vegas Boulevard: Russell Road to Sahara  
24 Avenue December 2022 Revised June 2024  
25 **CC 4049 to CC 4261**
- 26 55. Clark County Pedestrian Study, Las Vegas Boulevard: Tropicana Avenue to  
27 Spring Mountain Road 2016 Update of Non-Permanent Obstructions dated  
28 12.2024  
**CC 4262 to CC 4329**
56. Summary of Final Action for October 4, 2016 Board of County Commissioners  
Meeting, agenda item 26 discusses the approval of the No Obstruction Zones  
on Las Vegas Boulevard  
**CC 4330 to CC 4350**



- 1       **57.** Maps depicting the Clark County No Obstruction Zones CC Code 16.11 Las  
2               Vegas Boulevard  
3               **CC 4351 to CC 4371**
- 4       **58.** Bid No. 605340-19 Annual Requirements Contract for Full-Coverage  
5               Maintenance Services for Elevators and Escalators Located on Pedestrian  
6               Bridges  
7               **CC 4372 to CC 4454**
- 8       **59.** Bid No. 606957-24 Annual Requirements Contract for Custodial Service on Las  
9               Vegas Boulevard Pedestrian Bridge, Elevator, Escalator, Bollard, and  
10              Sidewalks  
11             **CC 4455 to CC 4531**
- 12       **60.** Daily Inspection Reports from January 1, 2021, to the present  
13             **CC 4532 to 6069**
- 14       **61.** Dr. Sousa's expert report file  
15             **CC 6070 to 6158**
- 16       **62.** Privilege log of documents produced as part of Dr. Sousa's expert report file  
17             **CC 6159 to CC 6160**
- 18       **63.** Document titled: Dr. Sousa's Objections and Responses to Requests for  
19             Production of Documents Pursuant to Subpoena  
20             **CC 6161 to CC 6170**
- 21       **64.** Criminal files for Cases Identified in Criminal Legal Inquire Result Report  
22             (redacted only as to the personally identifiable information of non-parties  
23             pursuant to NRS 239.014)  
24             **CC 6171 to CC 6554**
- 25       **65.** Complaint filed in the EJDC of Nevada titled: *Trenia Woods v. MGM Resorts*  
26             *International, et al., A-19-796711-C*  
27             **CC 6555 to CC 6561**
- 28       **66.** Documents returned from County Clerk Records in Response to search terms and  
            date ranges (1/1/21 to Present) agreed in March 12, 2025, meet-and-confer  
            conference call:  
  
            44. "16.13.030" - CC 6562 to CC 6729  
            45. "Chapter 16.13" - CC 6730 to CC 7317  
            46. "Pedestrian bridge" 1 - CC 007318 to CC011745  
            47. "Pedestrian bridge" 2 - CC 011746 to CC020646  
            48. "Pedestrian bridge" 3 - CC 020647 to CC030518  
            49. "Pedestrian bridge" 4 - CC 030519 to CC044276

50. "Flow Zone" – CC044277 to CC044770
51. "Touchdown structure" – CC044771 to CC047165
52. "Pedestrian traffic" 1 – CC047166 to CC077323
53. "Pedestrian traffic" 2 – CC077324 to CC097382
54. "Pedestrian traffic" 3 – CC097383 to CC112628
55. "Pedestrian traffic" 4 – CC112629 to CC124123
56. "Disorder" 1 – CC124124 to CC131995
57. "Disorder" 2 – CC131996 to CC145525
58. "Disorder" 3 – CC145526 to CC155980
59. "Disorder" 4 - CC155981 to CC169539
60. "Stop or stand" – CC169540 to CC170033
61. "Stopping or standing" – CC170034 to CC170169
62. "bridge" and "Superbowl" – CC170170 to CC171730
63. "bridge" and "perform" 1 – CC171731 to CC193024
64. "bridge" and "perform" 2 – CC193025 to CC207861
65. "bridge" and "perform" 3 – CC207862 to CC220237
66. "bridge" and "perform" 4 – CC220238 to CC232044
67. "bridge" and "perform" 5 – CC232045 to CC250080
68. "bridge" and "perform" 6 – CC250081 to CC264538
69. "bridge" and "perform" 7 – CC264539 to CC284631
70. "bridge" and "perform" 8 – CC284632 to CC324364
71. "bridge" and "perform" 9 – CC324365 to CC344420
72. "bridge" and "show girl" – CC344421<sup>1</sup> (1 File, 4.66 MB)
73. "bridge" and "homeless" - CC344422 (338 Files, 9.74 GB)
74. "bridge" and "unsheltered" - CC344423 (86 Files, 1.23 GB)
75. "bridge" and "chronic" - CC344424 (136 Files, 3.91 GB)
76. "bridge" and "tour" - CC344425 (134 Files, 11.7 GB)
77. "bridge" and "solicit" - CC344426 (116 Files, 7.12 GB)
78. "bridge" and "disorder" - CC344427 (106 Files, 3.74 GB)
79. "bridge" and "crime" - CC344428 (269 Files, 10.4 GB)
80. "bridge" and "panhandle" - CC344429 (5 Files, 329 MB)
81. "bridge" and "talk" - CC344430 (240 Files, 13.5 GB)
82. "bridge" and "ask" - CC344431 (308 Files, 22.0 GB)
83. "bridge" and "stop" - CC344432 (627 Files, 32.8 GB)
84. "bridge" and "stand" - CC344433 (463 Files, 27.8 GB)
85. "bridge" and "art" - CC344434 (454 Files, 27.3 GB)
86. "bridge" and "music" - CC344435 (277 Files, 16.4 GB)
87. "bridge" and "obstruct" - CC344436 (121 Files, 9.28 GB)
88. "bridge" and "Formula 1" - CC344437 (67 Files, 1.96 GB)
89. "bridge" and "F1" - CC344438 (161 Files, 15.1 GB)
90. "bridge" and "Grand Prix" - CC344439 (52 Files, 1.59 GB)

///

<sup>1</sup> Due to system and human resource constraints which have severely hampered the County's ability to respond to Plaintiffs' burdensome requests, these files are provided in the form they were received, without bates numbers and without being combined into a single PDF binder. The bates number is associated with file in which these documents are saved.

- 1       67. E-mail attachments from Lisa Logsdon dated Monday, November 13, 2023  
2       7:56:00 AM, attached hereto as bates **CC344439 to CC344455**
- 3       68. E-mail from Lisa Logsdon dated Monday, November 13, 2023 7:56:00 AM,  
4       attached hereto as bates **CC344456**
- 5       69. E-mail from Lisa Logsdon to ACLU, dated Monday, November 14, 2023 4:26:00  
6       PM, attached hereto as bates **CC344457 to CC344459**
- 7       70. Documents returned from Clark County Department of Public Works IT in  
8       Response to search terms and date ranges (1/1/21 to Present) agreed in March 12,  
9       2025, meet-and-confer conference call, attached hereto as bates **CC344460 to**  
10       **CC345638**
- 11       71. Jennifer Cooper E-mails from January 1, 2024 and January 2, 2024 using search  
12       terms RE: January 2, 2024 Tweet, attached hereto as bates **CC345638 to**  
13       **CC345673;**
- 14       72. Privilege Log for Jennifer Cooper E-mails, attached hereto as bates **CC345674;**
- 15       73. Privilege Log for Documents returned from Clark County Department of Public  
16       Works, attached hereto as bates **CC345675 to CC345677;**
- 17       74. Jessica Colvin E-mails in Response to search terms and date ranges (1/1/21 to  
18       Present) agreed in March 12, 2025, meet-and-confer conference call, attached  
19       hereto as bates **CC345678 to CC347552 and CC347553 to CC347613;**
- 20       75. Privilege Log for Jessica Colvin E-mails, attached hereto as bates **CC347614 to**  
21       **CC347629.**
- 22       76. Minutes for BCC Meetings
- 23       44. January 2, 2024, BCC Verbatim Minutes for Item No. 38, attached hereto as  
24       bates CC347630 to CC347640;
- 25       45. December 5, 2023, BCC Verbatim Minutes for Item No. 36, attached hereto as  
26       bates CC347641;
- 27       46. November 21, 2023, BCC Verbatim Minutes for Item No. 68, attached hereto  
28       as bates CC347642;
47. June 21, 2022, BCC Verbatim Minutes for Item No. 76, attached hereto as  
      bates CC347643;
48. May 3, 2022, BCC Verbatim Minutes for Item No. 65, attached hereto as bates  
      CC347644 to CC347682;
49. April 19, 2022, BCC Verbatim Minutes for Item No. 59, attached hereto as  
      bates CC347683 to CC347684;
50. November 1, 2016, BCC Minutes for Item No. 32, attached hereto as bates  
      CC347685 to CC347686;
51. April 19, 2016, BCC Minutes for Item No. 49, attached hereto as bates

- CC347687 to CC347688;  
 52. November 16, 2010, BCC Minutes for Item No. 56. Attached hereto as bates  
 CC347689;  
 53. April 15, 2008, BCC Minutes for Item No. 95, attached hereto as bates  
 CC347690 to CC347691;
77. Dr. Sousa's IDF Code Sheet pursuant to request at Meet and Confer held on April  
 10, 2025, attached hereto as bates **CC347692**;
78. Dr. Sousa's Calendar for Pedestrian Bridge Research Related Meetings pursuant  
 to request at Meet and Confer held on April 10, 2025, attached hereto as bates  
**CC347693 to CC347702**;
79. Additional relevant e-mails with LVMPD identified by Dr. Sousa while searching  
 calendar pursuant to request at Meet and Confer held on April 10, 2025, attached  
 hereto as bates **CC347703 to CC347705**;
80. E-mail search of [Abigail.Frierson@ClarkCountyNV.gov](mailto:Abigail.Frierson@ClarkCountyNV.gov) between 01.01.2021 to  
 02.16.2024 for e-mails including: "Pedestrian Bridge", "16.13", "Touchdown  
 Structure", "Sousa", and/or "Flow Zone"  
**CC 347706 to CC 348147**
81. And Privilege Log for Abigail Frierson e-mail search  
**CC 348148 to CC 348150**
82. E-mail search results for [lisa.logsdon@clarkcountydansv.gov](mailto:lisa.logsdon@clarkcountydansv.gov) for Non-conjunctive  
 search terms: "Sousa", "Langberg". "Pedestrian Bridge" "Frackrell", "16.13",  
 "Touchdown Structure", "Flow Zone" and Conjunctive search terms: "Violent"  
 and "Statistics" between 05.03.2022 and 02.16.2024, attached hereto as bates  
**CC 348151 to CC 348920**
83. Privilege Log for [lisa.logsdon@clarkcountydansv.gov](mailto:lisa.logsdon@clarkcountydansv.gov) search, attached hereto as  
 bates  
**CC 348921 to CC 348936**.
84. Search of Denis Cederburg E-mails 1 of 3 for key words "Pedestrian Bridge",  
 ""16.13", "Touchdown Structure", "Sousa", and/or "Flow Zone" between 1/1/21 to  
 2/16/24, disclosed as bates  
**CC 348937 to CC 350373**
85. Select e-mails with exhibits attached for William H. Sousa, PhD and County  
 Counsel Lisa Logsdon, produced pursuant to April 27, 2025, request of Plaintiffs'  
 counsel, disclosed as bates  
**CC 350374 to CC 350392**
86. Additional E-mail Correspondence regarding compensation for Defendant Clark  
 County's expert, William H. Sousa, PhD for expert file preparation, assistance

with written discovery/subpoena responses, and potential rebuttal report, disclosed as

**CC 350393 to CC 350399**

**87.** Privilege Log for Denis Cederburg e-mail search 1 of 3, disclosed as  
**CC 350400 to CC 350408**

**88.** E-mail search for e-mails to and from @lvmpd.com domain for key words "Pedestrian Bridge", "'16.13", "Touchdown Structure", "Sousa", and/or "Flow Zone" between 1/1/21 to 2/16/24, curated to remove irrelevant search results for fatality detail reports/press releases, sexual assault reporting/coordination with DFS and Social Services, worker's compensation and health insurance related correspondence for LVMPD employees, correspondence dealing with Linda Sousa or N. Sousa P#15058, CCDC officer overtime/comp time calculations, and all other e-mail dealing with off-Strip related events and/or subject matter, disclosed as **CC350409 to CC351392 (redacted as to restricted LVMPD systems access login information only)**

**89.** Search results of all Clark County e-mail accounts to and from @nevadaresorts.org domain including key words "Pedestrian Bridge", "'16.13", "Touchdown Structure", "Sousa", and/or "Flow Zone" between 1/1/21 to 2/16/24, disclosed as bates  
**CC 363242 to CC 363714**

**90.** Original 2012 Kimley-Horn contract for Pedestrian Study on Las Vegas Boulevard – Russel Road to Sahara Avenue, disclosed as  
bates **CC363715 to CC363740.**

**91.** 2013 1st Supplemental Kimley-Horn contract for Pedestrian Study on Las Vegas Boulevard – Russel Road to Sahara Avenue, disclosed as  
bates **CC 363741 to CC 363757**

**92.** 2015 2<sup>nd</sup> Supplemental Kimley-Horn contract for Pedestrian Study on Las Vegas Boulevard – Russel Road to Sahara Avenue, disclosed as  
bates **CC 363758 to CC 363772**

**93.** 2015 3<sup>rd</sup> Supplemental Kimley-Horn contract for Pedestrian Study on Las Vegas Boulevard – Russel Road to Sahara Avenue, disclosed as  
bates **CC 363773 to CC 363778**

**94.** 2016 4<sup>th</sup> Supplemental Kimley-Horn contract for Pedestrian Study on Las Vegas Boulevard – Russel Road to Sahara Avenue, disclosed as  
bates **CC 363779 to CC 363802**

**95.** Justice Court Odyssey case search for citations issued under 16.11 for NOC Codes 56750 (16.11.040), 58422 (16.11.070), 58431 (16.11.060), 58432(16.11.080) between January 1, 2022 and January 2, 2024, disclosed as  
bates **CC 363803 to CC 363865**

**96.** All Clark County domain e-mails to and from [roger.patton@wsp.com](mailto:roger.patton@wsp.com) between 1/1/21 and 2/16/24 including any of the following key words: "Pedestrian Bridge", "'16.13", "Touchdown Structure", "Sousa", and/or "Flow Zone", disclosed as  
bates **CC 363869 to CC 364028;**

**97.** Exchange File 1 of 3, A through B, of All Clark County domain e-mails to and from the domain @kimley-horn.com between 1/1/21 and 2/16/24 including any of



the following key words: Pedestrian Study", "Las Vegas Boulevard", "Russell Road to Sahara Avenue", "Tropicana Avenue to Spring Mountain Road", and "Non-permanent obstructions", disclosed as bates CC 364029 to CC 368225;

98. Exchange File 1 of 3, C through D, of All Clark County domain e-mails to and from the domain @kimley-horn.com between 1/1/21 and 2/16/24 including any of the following key words: Pedestrian Study", "Las Vegas Boulevard", "Russell Road to Sahara Avenue", "Tropicana Avenue to Spring Mountain Road", and "Non-permanent obstructions", disclosed as bates CC 368226 to CC 371370;
99. Search of Denis Cederburg E-mails 2 of 3 for key words "Pedestrian Bridge", ""16.13", "Touchdown Structure", "Sousa", and/or "Flow Zone" between 1/1/21 to 2/16/24, disclosed as bates, disclosed as bates CC 351393 to CC 353493;
100. Search of Denis Cederburg E-mails 3 of 3 for key words "Pedestrian Bridge", ""16.13", "Touchdown Structure", "Sousa", and/or "Flow Zone" between 1/1/21 to 2/16/24, disclosed as bates, disclosed as bates CC 353494 to CC 355091;
101. Search of Kaizad Yazdani E-mails 1 of 6 for key words "Pedestrian Bridge", ""16.13", "Touchdown Structure", "Sousa", and/or "Flow Zone" between 1/1/21 to 2/16/24, disclosed as bates, disclosed as bates CC 355092 to CC 355653;
102. Search of Kaizad Yazdani E-mails 2 of 6 for key words "Pedestrian Bridge", ""16.13", "Touchdown Structure", "Sousa", and/or "Flow Zone" between 1/1/21 to 2/16/24, disclosed as bates, disclosed as bates CC 355654 to CC 357669;
103. Search of Kaizad Yazdani E-mails 3 of 6 for key words "Pedestrian Bridge", ""16.13", "Touchdown Structure", "Sousa", and/or "Flow Zone" between 1/1/21 to 2/16/24, disclosed as bates, disclosed as bates CC 357670 to CC 360274;
104. Search of Kaizad Yazdani E-mails 4 of 6 for key words "Pedestrian Bridge", ""16.13", "Touchdown Structure", "Sousa", and/or "Flow Zone" between 1/1/21 to 2/16/24, disclosed as bates, disclosed as bates CC 360275 to CC 361959;
105. Search of Kaizad Yazdani E-mails 5 of 6 for key words "Pedestrian Bridge", ""16.13", "Touchdown Structure", "Sousa", and/or "Flow Zone" between 1/1/21 to 2/16/24, disclosed as bates, disclosed as bates CC 361960 to CC 362724;
106. Search of Kaizad Yazdani E-mails 6 of 6 for key words "Pedestrian Bridge", ""16.13", "Touchdown Structure", "Sousa", and/or "Flow Zone" between 1/1/21 to 2/16/24, disclosed as bates, disclosed as bates CC 362725 to CC 363241;
107. Criminal files for Cases Identified in Justice Court Case Search for 66203 NOC Code not previously disclosed (redacted only as to the personally identifiable information of non-parties pursuant to NRS 239.014), disclosed as CC371371 to CC371986;
108. Exchange File 1 of 3, E through I, of All Clark County domain e-mails to and from the domain @kimley-horn.com between 1/1/21 and 2/16/24 including any of the following key words: Pedestrian Study", "Las Vegas Boulevard", "Russell Road to Sahara Avenue", "Tropicana Avenue to Spring Mountain Road", and "Non-permanent obstructions", disclosed as bates CC 371987 to CC 375991;
109. Exchange File 1 of 3, J through Z, of All Clark County domain e-mails to and from the domain @kimley-horn.com between 1/1/21 and 2/16/24 including any of the following key words: Pedestrian Study", "Las Vegas Boulevard", "Russell Road to Sahara Avenue", "Tropicana Avenue to Spring Mountain Road", and

"Non-permanent obstructions", disclosed as bates CC 375992 to CC 379421 (Curated as to only e-mails dealing with the Las Vegas Strip and/or the Resorts Corridor);

**110.** Exchange File 2 of 3, A through Z, of All Clark County domain e-mails to and from the domain @kimley-horn.com between 1/1/21 and 2/16/24 including any of the following key words: Pedestrian Study", "Las Vegas Boulevard", "Russell Road to Sahara Avenue", "Tropicana Avenue to Spring Mountain Road", and "Non-permanent obstructions", disclosed as bates CC 379422 to CC 383388 (Curated as to only e-mails dealing with the Las Vegas Strip and/or the Resorts Corridor);

**111.** Exchange File 3 of 3, A through Z, of All Clark County domain e-mails to and from the domain @kimley-horn.com between 1/1/21 and 2/16/24 including any of the following key words: Pedestrian Study", "Las Vegas Boulevard", "Russell Road to Sahara Avenue", "Tropicana Avenue to Spring Mountain Road", and "Non-permanent obstructions", disclosed as bates CC 383389 to CC 383873 (Curated as to only e-mails dealing with the Las Vegas Strip and/or the Resorts Corridor); and

**112.** 2022.12.16 DRAFT Clark County Pedestrian Study with Comments, disclosed as bates CC 383874 to CC 384108.

**113.** Daily Inspection Reports from January 1, 2021, to March 12, 2025. CC 383874 to CC 385862 See opening paragraph.

**114.** Key and graphic of Las Vegas Strip signage as of July 2025 (New key and graphic pending completion of ongoing survey. Updated materials will be supplemented upon receipt from Public Works). CC 385863 to CC 385837

**115.** Key and graphic of the Las Vegas Strip signage as of September 2025 CC 385838 to CC 385872

**116.** Case File for Event# LLV240200044159 redacted as to personally identifiable information of non-parties. CC 385873 to CC 385875

**117.** Unredacted Case File for Event # LLV250800092630 pursuant to request from counsel and consented to by subject of citation, CC 385876 – CC 385898

**118.** Unredacted Case File for Event # LLV250800092630 (Miabelli) pursuant to request from counsel and consented to by subject of citation, CC 385899 – CC 385910

**119.** E-mail from Lisa Logsdon titled: Bridge Ordinance - Legal Discussion CC 385911-CC385915

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1           **120. Frierson's Calendar portfolio Subject: Quarterly Leadership Meeting**  
2                                   **CC 385916-CC 385937**

3           **121. Frierson's Calendar portfolio Subject Pedestrian Flow Zone Ordinance**  
4                                   **Meeting with Lisa Logsdon, County Counsel**  
5                                   **CC 385938-CC 385960**

6           **122. Frierson's Notes Re: Subject Pedestrian Flow Zone Ordinance**  
7                                   **CC 385961-CC 385962**

8           **Defendant CLARK COUNTY reserves the right to utilize any documents**  
9           **identified by the Plaintiff or any other party up to the time of trial.**

10           **Computation of Damages by Category for Defendant CLARK COUNTY**

11           1.     Attorney's fees and costs: all fees and costs in an amount allowed by law.

12           DATED this 3rd day of December 2025.

13                                   STEVEN B. WOLFSON  
14                                   DISTRICT ATTORNEY

15                                   By: /s/ Joel K. Browning  
16                                   JOEL K. BROWNING  
17                                   Deputy District Attorney  
18                                   Bar No. 14489  
19                                   TIMOTHY ALLEN  
20                                   Deputy District Attorney  
21                                   Bar No. 14818  
22                                   500 South Grand Central Pkwy., Suite 5075  
23                                   Las Vegas, Nevada 89155-2215  
24                                   Attorneys for Defendant



**CERTIFICATE OF ELECTRONIC SERVICE**

I hereby certify that I am an employee of the Office of the Clark County District Attorney and that on this 3rd day of December, 2025, I served a true and correct copy of the foregoing **DEFENDANT CLARK COUNTY'S TWENTY-FOURTH SUPPLEMENTAL DISCLOSURE AND PRODUCTION OF DOCUMENTS PER FRCP 26(a)(1)** (United States District Court Pacer System or the Eighth Judicial District Wiznet), by e-mailing the same to the following recipients. Service of the foregoing document by e-mail is in place of service via the United States Postal Service.

Christopher M. Peterson  
Tatiana R. Smith  
AMERICAN CIVIL LIBERTIES  
UNION OF NEVADA  
4362 W. Cheyenne Ave.  
North Las Vegas, NV 89032  
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[leo@nvlitigation.com](mailto:leo@nvlitigation.com)

/s/Renee S. Albert  
An Employee of the Clark County District  
Attorney's Office – Civil Division