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Elizabeth A. Brown
Clerk of Supreme Court

7 SUPREME COURT
8 STATE OF NEVADA
9

10 DAPHNE WILLIAMS,
11 Appellant,

No. 80350

12 vs.

13 CHARLES "RANDY" LAZER,
14 Respondent.

15 **RESPONDENT'S OPPOSITION TO THE AMERICAN CIVIL LIBERTIES**
16 **UNION AND AMERICAN CIVIL LIBERTIES UNION OF NEVADA'S**
17 **MOTION FOR LEAVE TO FILE *AMICI CURIAE* BRIEF**

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Attorney for plaintiff/respondent
22 Charles "Randy" Lazer
23
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1 Pursuant to Nevada Rule of Appellate Procedure 29, Respondent Charles
2 “Randy” Lazer hereby submits this opposition to the American Civil Liberties
3 Union’s and American Civil Liberties Union of Nevada’s (collectively, “ACLU”)
4 motion for leave to file amici curiae brief in support of defendant-appellant, filed
5 January 4, 2021.
6

7 ACLU is an organization which advocates for individual freedoms.
8 However, Marc J. Randazza, Esq., counsel for Appellant, is a former donor to the
9 ACLU. See Exhibit A, printout from Mr. Randazza’s Twitter feed where he
10 identifies himself as a former “Guardian of Liberty” donor. Thus, ACLU’s
11 independence and motivations for filing its amicus brief are in question. Allowing
12 ACLU to file an amicus brief in this matter would be akin to giving Mr. Randazza
13 an opportunity to file a second brief. Mr. Randazza’s strong association with
14 ACLU should disqualify ACLU from filing an amicus brief.
15
16

17
18 DATED this 11th day of January, 2021.

19 LAW OFFICES OF
20 MICHAEL F. BOHN, ESQ., LTD.

21 By: /s/ Adam R. Trippiedi, Esq.
22 Michael F. Bohn, Esq.
23 Adam R. Trippiedi, Esq.
24 2260 Corporate Cir, Ste 480
25 Henderson, Nevada 89074
26 Attorney for plaintiff/respondent
27

1 **CERTIFICATE OF SERVICE**

2 In accordance with N.R.A.P. 25, I hereby certify that I am an employee of
3
4 the Law Offices of Michael F. Bohn, Esq., Ltd., and that on the 11th day of
5 January, 2021, a copy of the foregoing **RESPONDENT’S OPPOSITION TO**

6
7 **THE AMERICAN CIVIL LIBERTIES UNION AND AMERICAN CIVIL**
8 **LIBERTIES UNION OF NEVADA’S MOTION FOR LEAVE TO FILE**

9
10 **AMICI CURIAE BRIEF** was served electronically through the Court’s electronic
11 filing system to the following individuals:

12
13 Marc J. Randazza, Esq.
14 Alex J. Shepard, Esq.
15 RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Dr, Ste 109
Las Vegas, Nevada 89117

16
17 /s/ /Marc Sameroff /
18 An Employee of the LAW OFFICES OF
19 MICHAEL F. BOHN, ESQ., LTD.
20
21
22
23
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25
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EXHIBIT A

EXHIBIT A



Tweet



Marc J. Randazza

@marcorandazza



Unlike the [@ACLU](#), I believe in freedom of speech. If the content of that speech sucks, I rely on more speech to fight it.

I used to be an ACLU "Guardian of Liberty" donor. I ended that when Tony Romero turned the wheel on free speech a decade ago.

9:56 AM · Jun 21, 2018 · Twitter Web Client

26 Retweets **1** Quote Tweet **66** Likes

