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DISTRICT COURT

CLARK COUNTY, NEVADA

MARY BROWN, an individual, PHIL BROWN, an individual, Husband and Wife PLAINTIFFS, v. JOHN DOE, DEFENDANTS.	CASE NO. A-12-658911-C DEPT. NO. XXVI

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(a) and EJDCR 7.26(a), I hereby certify that I am an employee of GLEN J. LERNER & ASSOCIATES, and on the 6th day of April, 2012, the foregoing **Motion to Quash or Stay Subpoena** was served via facsimile, and by depositing a true and correct copy in the United States Mail, postage prepaid, addressed as follows, to the following counsel of record:

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An Employee of Glen J. Lerner & Associates

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MOTION TO QUASH OR STAY SUBPOENA

COMES NOW John or Jane Doe, Defendants herein, through attorney Tony Abbatangelo of the Law Offices of Glen J. Lerner & Associates and asks this Court to quash a certain Subpoena issued on or about April 2, 2012 on behalf of Plaintiffs herein. For the reasons set forth below, the subpoena should be quashed. Alternatively, this Court may choose to stay the subpoena as to the Doe movants while they seek a protective order from the Supreme Court of Nevada.

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NOTICE OF MOTION

YOU AND EACH OF YOU will please take Notice that the undersigned will bring the foregoing MOTION TO QUASH OR IN THE ALTERNATIVE, STAY SUBPOENA on the 9 day of May at 9:00am Disc. Comm., 2012, or as soon thereafter as Counsel may be heard.

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FACTS

Phil and Mary Brown, husband and wife, seek damages from an anonymous poster on the Las Vegas Review Journal who uses the pseudonym "Lawyer." *See* Plaintiff's Subpoena, attached hereto as ***Exhibit A***.

John or Jane Doe, aka Lawyer, is an anonymous poster, one of hundreds, if not thousands, who comment on Las Vegas Review Journal stories without cost. Lawyer, by virtue of his or her using a gender neutral alias, does not want his or her name real name known. As will be shown below, John/Jane Doe, aka Lawyer, has Constitutional protections regarding anonymous speech. Therefore, Plaintiffs' Subpoena, which seeks the name, email address, and IP address of the person(s) posting comments as "Lawyer" must be quashed.

ANONYMOUS SPEECH IS PROTECTED BY THE FIRST AMENDMENT

The First Amendment to the Constitution of the United States provides broad protection to persons engaged in speech. The protection is broad enough that it encompasses anonymous speech. The Supreme Court of the United States has consistently defended the right to engage in anonymous speech in many situations, noting that "anonymity is a shield from the tyranny of the majority . . . that exemplifies the purpose (of the First Amendment) to protect unpopular individuals from retaliation . . . at the hand of an intolerant society." *McIntyre v. Ohio Elections Commission*, 514 U.S. 334 (1995). The Court in *McIntyre* also stated that, "an author's decision

to remain anonymous, like other decisions concerning omissions or additions to the content of a publication, is an aspect of the freedom of speech protected by the First Amendment."

The Supreme Court of the United States protecting anonymous speech is not a new concept. On the contrary, three decades prior to the *McIntyre* decision, the Supreme Court of the United States struck down an ordinance requiring people distributing handbills to identify their names. *Talley v. California*, 362 U.S. 60 (1960). In discussing *Talley*, the *McIntyre* court stated:

> The freedom to publish anonymously extends beyond the literary realm. In *Talley*, the Court held that the First Amendment protects the distribution of unsigned handbills urging readers to boycott certain Los Angeles merchants who were allegedly engaging in discriminatory employment practices. 362 U.S. 60, 80 S. Ct. 536, 4 L. Ed. 2d 559. Writing for the Court, Justice Black noted that "persecuted groups and sects from time to time throughout history have been able to criticize oppressive practices and laws either anonymously or not at all." *Id.*, at 64. Justice Black recalled England's abusive press licensing laws and seditious libel prosecutions, and he reminded us that even the arguments favoring the ratification of the Constitution advanced in the Federalist Papers were published under fictitious names. *Id.*, at 64-65. On occasion, quite apart from any threat of persecution, an advocate may believe her ideas will be more persuasive if her readers are unaware of her identity. Anonymity thereby provides a way for a writer who may be personally unpopular to ensure that readers will not prejudge her message simply because they do not like its proponent.

Anonymous speech receives the same constitutional protection regardless of the means of communication. Speech on the Internet does not receive a different level of protection. *Reno v. ACLU 521 U.S. 844 (1997).* As the U.S. District Court for the Western District of Washington noted in 2001 "The right to speak anonymously extends to speech via the Internet. Internet anonymity facilitates the rich, diverse, and far ranging exchange of ideas." *Doe v. 2themart.com*, 140 F. Supp. 2d 1088 (W.D. Wash, 2001). In *Reno, supra*, the Supreme Court of the United States held "through the use of chat rooms, any person with a phone line can become a town crier with a voice that resonates farther than it could from any soapbox. Through the use of Web pages, mail exploders and newsgroups, the same individual can become a pamphleteer."

Courts also recognize that "anonymity is a *particularly important component* of Internet speech and have held that "the constitutional rights of Internet users, including the First Amendment right to speak anonymously, ***must be carefully safeguarded***." *Doe v. 2TheMart.com, supra.*

The courts have also held that state action is implicated in cases involving subpoenas and other court orders. *New York Times v. Sullivan*, 376 U.S. 254 (1964). In *New York Times*, a public official filed suit claiming he was defamed by a newspaper advertisement. He was awarded $500,000.00 in damages. The Supreme Court of the United States reversed the lower courts finding on First Amendment grounds. The Opinion reads in part:

> The general proposition that freedom of expression upon public questions is secured by the First Amendment has long been settled by our decisions. The constitutional safeguard, we have said, "was fashioned to assure unfettered interchange of ideas for the bringing about of political and social changes desired by the people." *Roth* v. *United States*, 354 U.S. 476, 484. "The maintenance of the opportunity for free political discussion to the end that government may be responsive to the will of the people and that changes may be obtained by lawful means, an opportunity essential to the security of the Republic, is a fundamental principle of our constitutional system." *Stromberg* v. *California*, 283 U.S. 359, 369. "It is a prized American privilege to speak one's mind, although not always with perfect good taste, on all public institutions," *Bridges* v. *California*, 314 U.S. 252, 270, and this opportunity is to be afforded for "vigorous advocacy" no less than "abstract discussion." *N. A. A. C. P.* v. *Button*, 371 U.S. 415, 429. The First Amendment, said Judge Learned Hand, "presupposes that right conclusions are more likely to be gathered out of a multitude of tongues, than through any kind of authoritative selection. To many this is, and always will be, folly; but we have staked upon it our all." *United States* v. *Associated Press*, 52 F. Supp. 362, 372 (D. C. S. D. N. Y. 1943). Mr. Justice Brandeis, in his concurring opinion in *Whitney* v. *California*, 274 U.S. 357, 375-376, gave the principle its classic formulation: "Those who won our independence believed . . . that public discussion is a political duty; and that this should be a fundamental principle of the American government. They recognized the risks to which all human institutions are subject. But they knew that order cannot be secured merely through fear of punishment for its infraction; that it is hazardous to discourage thought, hope and imagination; that fear breeds repression; that repression breeds hate; that hate menaces stable government; that the path of safety lies in the opportunity to discuss freely supposed grievances and proposed remedies; and that the fitting remedy for evil counsels is good ones. Believing in the power of reason as applied through public discussion, they eschewed silence coerced by law -- the argument of force in its worst form. Recognizing the occasional tyrannies of governing majorities, they amended the Constitution so that free speech and assembly should be guaranteed."

Thus, First Amendment protections are triggered whenever a subpoena is issued, even to a private newspaper as in *New York Times, supra*, and this Court must ensure those protections are enjoyed by John or Jane Doe who use the name "Lawyer" when commenting on the LVRJ website

As stated in multiple cases above, the First Amendment generally protects anonymous speech. *Buckley v. American Constitutional Law Foundation*, 525 U.S. 182, 199-200, 119 S. Ct. 636, 142 L. Ed. 2d 599 (1999). In *Buckley*, the plaintiffs were numerous individuals who circulated petitions for ballot initiatives. The law in Colorado required these individuals to wear name badges. Some initiatives, obviously, were unpopular. While circulating one petition to legalize marijuana use under limited circumstances, one solicitor was harassed, others told of similar treatment depending on the nature of the initiative for which he or she was gathering signatures. The Supreme Court of the United States struck down the provision that individuals gathering signatures for petitions wear name tags and indicate if they were volunteer or paid. In other words, the Supreme Court upheld the right to be anonymous. The Supreme Court of the United States held this portion of Colorado's law invalid because it required those paid to gather signatures state they were paid, whereas volunteers could remain anonymous. The Opinion states:

> "In sum, we agree with the Court of Appeals appraisal: Listing paid circulators and their income from circulation "forces paid circulators to surrender the anonymity enjoyed by their volunteer counterparts," 120 F.3d at 1105; no more than tenuously related to the substantial interests disclosure serves, Colorado's reporting requirements, to the extent that they target paid circulators, "fail exacting scrutiny," *Ibid.*

In the present case, Jane/John Doe who uses the pseudonym "Lawyer" is admittedly a very unpopular member of the legal community. She has commented on judges she feels have wronged her and expressed disdain towards police and other public officials under the First Amendment protection of free speech and anonymity. All this was done with the hope of persuading voters, citizens, and readers to lay the groundwork of change in the Clark County legal system that Lawyer deems necessary. Disclosure of his or her identity would effectively ruin "Lawyer's" career. He or she would be reported to the bar, likely suspended, and not be able to practice. Lawyer feels that the District Attorney's office in Clark County has made serious mistakes in not accepting pay cuts during the recession, not convicting Laci Thomas, etc. It is imperative that any lawyer be able to call other attorneys to discuss plea deals in criminal cases and resolutions in civil cases. John or Jane Doe will be unable to do so if her identity is known.

Courts have held that subpoenas seeking information regarding anonymous individuals raise First Amendment concerns; *NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 462, 78 S. Ct. 1163, 2 L. Ed. 2d 1488 (1958). In *NAACP*, the National Association for the Advancement of Colored People was required under Alabama law to disclose all of its members. This Court can take judicial notice that in 1958, members of the NAACP were likely not popular. The reason Alabama wanted this disclosure was that the NAACP members were engaging in protests in the state of Alabama. The Supreme Court of the United States held that a discovery order requiring NAACP to disclose its membership list violated First Amendment; in other words, NAACP members, unpopular at that time and in the State of Alabama, enjoyed the protections of being anonymous. *NAACP* is one of numerous examples of the Supreme Court of the United States protecting the name of individuals who clearly wish to remain anonymous. See: *In re Verizon Internet Servs., Inc.*, 257 F. Supp. 2d 244, 259 (D. D.C. 2003), *rev'd on other grounds, Recording Indus. Ass'n of America, Inc. v. Verizon Internet Servs., Inc.* 359 U.S. App. D.C. 85, 351 F.3d 1229 (D.C. Cir. 2003); *Columbia Ins. Co. v. Seescandy.Com*, 185 F.R.D. 573, 578 (N.D. Cal. 1999); *ACLU v. Johnson*, 4 F. Supp. 2d 1029, 1033 (D. N.M. 1998), *aff'd*, 194 F.3d 1149 (10th Cir. 1999).

Courts have also recognized the Internet as a valuable forum for robust exchange and debate. *See Reno v. ACLU, supra,*; *United States v. Perez*, 247 F. Supp. 2d 459, 461 (S.D.N.Y. 2003) (noting the Internet's "vast and largely anonymous distribution and communications network").

ANONYMOUS SPEAKERS ENJOY A QUALIFIED PRIVILEGE UNDER THE FIRST AMENDMENT

It is well settled that not all speech is protected by the First Amendment. Material that is obscene does not enjoy protection, nor does speech that is defamatory. See e.g. *Columbia Ins. Co. v. Seescandy.com*, 185 FR D. 573, (N.D. Cal 1999). The courts have taken an approach to cases where a party desires to unmask an anonymous critic that balances the First Amendment interests of the speaker with the rights of the allegedly aggrieved party. *Sony Music Entertainment, Inc. v. Does 1 – 40*, 326 F. Supp. 2d 556, 565 (So. District of New York, 2004).

This approach fulfills the caution raised by the Supreme Court in *Buckley, supra,* which states "Courts must be vigilant . . . and guard against undue hindrances to . . . the exchange of ideas. 525 U.S. 182 (1999). Thus, even while certain classes of speech do not receive any protection from the First Amendment, litigants may not use a court's discovery powers to uncover the identities of people who have simply made statement the litigants dislike. *Id.* This conduct, prohibited by the highest court in this Country, appears to be precisely what the Browns are seeking through their subpoena.

In the present case, the Plaintiffs seem more interested in the identity of "Lawyer" than redress for a legitimate complaint. Mary Brown is a ***chief*** deputy district attorney in the Clark County District Attorney's office. She was paid $176,536.79 in salary and benefits during the calendar year 2011. See www.TransparentNevada.com. At the time of this Motion to Quash, Ms. Brown remains employed as a Chief Deputy District Attorney. ***Exhibit B***. She has not alleged loss of her position, a demotion, a salary reduction, reduction in benefits. Phil Brown was paid $146,110.36 during 2011 before leaving to enter private practice. Prior to his departure from the district attorney's office, he too was a chief deputy district attorney and was a respected and feared prosecutor. After his departure, he was given a track defending indigent defendants accused of domestic violence; a track he retains to the present day. Obviously, nothing "Lawyer" said had even the slightest impact on either Mary Brown's career or that of her husband, Phil Brown. The Supreme Court of the United States has repeatedly said that the subpoena power and the disclosure of an individual's identity is to be carefully used, the right to private and/or anonymous speech is to be "***carefully safeguarded***." *Doe v. 2TheMart.com, supra.*

In *Sony, supra,* the Supreme Court allowed the plaintiff to obtain a list of subscribers who had illegally downloaded music, stating "Defendants' First Amendment right to remain anonymous must give way to plaintiffs' right to use the judicial process to pursue what appear to be meritorious copyright infringement claims."

PLAINTIFFS HAVE NOT SATISFIED THE HIGH BURDEN TO UNMASK CRITICS

The first state to analyze the issues present in this motion—a litigant's ability to compel a provider of Internet services to reveal an anonymous speaker's identity, is *Dendrite v. Doe,* 775

A.2d 756 (N.J. App. 2001). The New Jersey Court of Appeals fashioned a set of factors that has been used by courts around the country. The factors are as follows:

a. Has the litigant made reasonable efforts to notify the accused Internet user of the pendency of the identification proceeding and explain how to present a defense?

b. Has the litigant set forth the exact statements that she contends constitutes actionable speech?

c. Has the litigant alleged all elements of the cause of action and introduced prima facie evidence within her control sufficient to survive a motion for summary judgment; and;

d. If the court concludes the litigant has made a prima facie case, what is the balance between the speaker's First Amendment right to speak anonymously and the strength of the prima facie case, along with the necessity for the disclosure of the anonymous defendant's identity to allow the litigant to properly proceed?

In the present case, the Plaintiffs have made no effort to notify "Lawyer" of their intended legal action against her. Lawyer has posted numerous comments to stories, almost on a daily basis. At no time was Lawyer asked for a retraction of her earlier posts. Secondly, the litigants (Phil Brown and Mary Brown, husband and wife) have not set forth the exact statements. A copy of Plaintiffs' Complaint is attached hereto as ***Exhibit C***. Plaintiff has only alleged that a user named "Lawyer" alleged that Mary Brown had sexual relations to get promoted at the Clark County District Attorney's Office. These allegations are repeated five times without ever stating the actual wording (which was different than "sexual relations"). Hence the Plaintiffs herein fail the first two prongs of the *Dendrite* test.

Plaintiffs likewise fail the third prong, which is whether the litigant has set forth a prima facie case of defamation. Defamation in Nevada requires proof that a defendant made a false and defamatory statement concerning plaintiff; an unprivileged publication of this statement was made by a third person, the defendant was *at least* negligent in making the comment, and plaintiff sustained damages. *Pegasus v. Reno Newspapers, Inc.*, 118 Nev. 706 (2002), see also *Simpson v. Mars Inc.*, 113 Nev. 188 (1997) and *Chowdry v. NLVH, Inc.*, 109 Nev. 478 (1993).

First, it should be stated that Phil Brown was not mentioned in any of the comments allegedly made by "Lawyer." As such, any claim he may have to his professional reputation is questionable at best. Secondly; the John or Jane Doe known as "Lawyer" was not negligent in making any of these comments. On the contrary, the comments were made after "Lawyer" conversed with acquaintances more familiar with the inner workings of the Clark County District Attorney's office than was Doe.

Mary Daggett, now Mary Brown, applied to be a clerk with the Clark County District Attorney's office at some time in 1998 or 1999. The individuals who supplied Doe with this information were present at the time of her alleged "hiring." When not offered a paid position, Mary Daggett volunteered a clerk in the appellate division. During her volunteer tenure there, Mary Daggett earned no money and was in a relationship with Phil Brown. The two were later married. Mary Daggett, prior to her marriage, proposed to the Chief Deputy District Attorney in charge of promotions that each candidate, including her, be evaluated by work produced and other performance and not be promoted according to time (as was custom), but ability. The "elephant in the room" or the "400 pound gorilla" was the fact that Mary Daggett was dating or had already married Phil Brown, one of the more respected and feared deputies in the office. "Lawyer" Jane or John Doe was informed that Phil Brown has an LLM in criminal law, making him likely very respected in criminal law circles. Because the poster "Lawyer" was provided with this information, she or he was not negligent in believing Mary Daggett, now Mary Brown, used her relationship with her now husband to advance from being a clerk (possibly a volunteer clerk) into a lucrative position as a deputy. Clark County deputy district attorneys are alleged by Commissioner Steve Sisolak to be the highest paid in the United States. According to McIntyre, supra and *Harper & Row Publishers, Inc. v. Nation Enters.*, 471 U.S. 539, 555-56, 105 S. Ct. 2218, 85 L. Ed. 2d 588 (1985), the right to remain anonymous does not protect copyright infringement. The anonymous poster must post "actionable communications" before the shroud of anonymity is lifted. *In re Subpoena Duces Tecum to America Online, Inc.*, 52 Va. Cir. 26, 2000 WL 1210372, at 6 (Va. Cir. Ct. 2000)." As is clear from the above, the anonymous poster "Lawyer" was provided information concerning her information before posting the same.

The final prong of the Dendrite test as to whether an anonymous critic can be revealed is a balancing test between the commenter's right to remain anonymous and the plaintiff's right to pursue a legal action. A telling case in how hard this burden is on the party seeking to lift the veil of anonymity is *Doe v. Individuals*, 561 F. Supp. 2d 249 (2008). In *Doe*, a female student at Yale sought the I.P. addresses and identities of individuals who posted not only a picture of her, but claimed, falsely, that she used heroin, discussed the size of her breasts, encouraged readers to proposition the student for sexual relations, had a sexually transmitted disease, and fantasized about being raped by her stepfather. Posters claimed that information about her alleged drug use and sexual improprieties were being sent to potential employers. These comments were posted on AutoAdmit, an internet discussion board on which participants post and review comments and information about undergraduate colleges, graduate schools, and law schools. AutoAdmit had between 800,000 and one million visitors per month.

Doe, the female victim of over 200 posts, only was granted permission to sue the anonymous posters after she showed the court that she was required to disclose the content thread to potential employers.

The instant case is obviously different. First, neither Plaintiff lost his or her respective position because of the comments attributed to "Lawyer." Chief Deputy District Attorney Mary Brown retains her position, a position that commands a great deal of respect and pays a high salary. Phil Brown is a successful, busy lawyer with a track, which are awarded only to competent attorneys. A Google search of Mary Brown on today's date revealed only four postings; the first a link to a story about this suit published March 29, 2012, a report on Ms. Brown's prosecution of a distracted driver with a link to ABC News, a link showing Ms. Brown is a member of the Statewide Juvenile Justice Reform, and a link to a Las Vegas Review Journal story about Mary Brown speaking to high school students about the dangers of sexting and cyber-bullying. It should be stated that Ms. Brown told these students: "You are not anonymous . . . you think using screen names gives you anonymity, but we can find you these days." ***Exhibit D***. While this writer does not expect Chief Deputy District Attorney Mary Brown to indulge high

school students with a detailed First Amendment analysis; her word choice is telling: "We can find you these days."

In performing this balancing test, this Court should look at some of the nonsensical comments posted on www.lvrj.com. It is very unlikely that any reader with a serious mind takes these comments seriously. On April 5, 2012, comments were posted about Judge Susan Scann "not getting it" regarding the HOA investigation. An anonymous poster that goes by "YOUR RIGHT" accused Sheriff Gillespie of assigning HOA complaints to the detective agency which was lead by a detective who has since been implicated in the alleged HOA scheme. A commentator "fed-up" posted that the Russian mob was involved in the HOA scheme. On April 4, 2012, a story in the Las Vegas Review Journal entitled "Former OJ Lawyer In Las Vegas Sues Florida Colleague." Comments included a post by a user named "Little Miss Snippy" who stated: *Why is Grasso bothering with a lawsuit? He can get all the dough he wants by stealing money - oops! - misappropiating funds from his clients. Isn't that what NV attorneys do?* A poster named "criminal lee" implicates the Mormon church in the deaths of David Amesbury and Nancy Quon.

The purpose of this brief history is to show this Court that it is very unlikely any reader with a serious mind—i.e. one capable of hurting the respective career of Mary and/or Phil Brown—took "Lawyer's" comments seriously. Furthermore, since the legal community in Las Vegas is relatively small, it is likely that all lawyers know about how Mary Brown was "hired" at the District Attorneys' office. Certainly, any "damages" are subjective inasmuch as the comments alleged to have been posted by Jane Doe Lawyer did not alter or decrease Mary Brown's earning capacity or reputation. Indeed, she has worked under three district attorneys: Stewart Bell, David Roger and now Steve Wolfson and has steadily climbed from being an unpaid clerk in the appellate division to a chief deputy in the space of 13 or 14 years.

CONCLUSION

Jane or John Doe, a.k.a. Lawyer, has set forth relevant, valid precedent from the highest court in this Country that anonymous free speech is protected by the First Amendment of the Constitution of the United States. While there are two exceptions, obscenity and actionable speech, Plaintiffs have failed to show as much. As has been shown above, the comments, which

are only alluded to in Plaintiff's complaint, no actionable speech was posted about either Plaintiff. Furthermore, Defendant John Doe was not negligent or malicious in posting the comments alluded to. Based on the arguments and case law cited above, this subpoena should be quashed. In the event this Court is not inclined to quash the subpoena at issue herein, Defendant respectfully asks that compliance of the subpoena be stayed to allow Defendant time to seek a protective order

Dated the 6th day of April, 2012.

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