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LUBA DACE
[redacted]
Pro Per

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

LUBA DACE, Plaintiff, v. MELVIN GRIMES, BEN CHILDS, LAW OFFICE OF BENJAMIN B. CHILDS, ROBERTS STOFFEL FAMILY LAW GROUP, Defendants.	Case No.: A-25-922833-C Dept. No.: 29 **PLAINTIFF'S CONSOLIDATED OPPOSITION TO DEFENDANT GRIMES' SPECIAL MOTION TO DISMISS AND SUPPLEMENT (NRS 41.660)**

INTRODUCTION

The operative complaint asserts four abuse-of-process claims against Defendant Grimes. Defendant seeks to recast this as an Anti-SLAPP "speech" case. It is not.

Plaintiff's claims target non-communicative misuse of judicial machinery: (1) off-record chambers instructions to file an OSC with altered terms, (2) ex parte restraints leveraged for property pressure, and (3) criminal branding injected into custody calendars without the statutory predicates of NRS 125C.0035. Anti-SLAPP protects good-faith communications "in direct connection with an issue under consideration." NRS 41.660(3)(a). It does not immunize irregular procurement of process or collateral misuse of process.

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The statute is clear: abduction becomes pertinent in custody only through NRS 125C.0035's exclusive procedure. Defendant's attempt to convert a criminal citation in pleadings into "notice" of abduction is not petitioning, but proof of abuse. Privilege likewise presupposes pertinence and cannot cure collateral misuse. Defendant's declaration, reduced to conclusory good-faith assertions, cannot carry prong one and is contradicted by the record and his own disciplinary history.

Because prong one fails, the motion should be denied with fees denied. In the alternative, limited discovery on good faith and the communications-versus-process distinction is warranted under NRS 41.660(3)(e).

The Argument proceeds in five steps. First, prong one fails because the gravamen is misuse of process, not communications. Second, "abduction" was not a noticed custody issue; NRS 125C.0035 provides the exclusive procedure, which was never invoked. Third, Defendant's criminal statute citations in pleadings did not and could not create calendar notice—pleadings cannot manufacture facts or jurisdiction, and their only effect was to evidence process abuse. Fourth, litigation privilege does not apply because pertinence was missing and privilege does not sanitize misuse of judicial machinery. Finally**,** Defendant's self-serving declaration cannot carry prong one; it is conclusory, contradicted by the record, and impeached by prior contempt and disciplinary findings.

REQUESTED RELIEF

Deny the Special Motion under NRS 41.660 and deny fees. Alternatively, authorize limited discovery on good faith, pertinence, and whether the challenged conduct is communicative or a misuse of process.

FACTUAL BACKGROUND (ABBREVIATED)

1. **Off-record OSC direction.** On March 4, 2022, Mr. Grimes testified under oath he received a message from Department P around December 15, 2021, instructing him to file an OSC and leave the attorney-fees line blank. There is no minute order, notice, or docket entry authorizing that instruction. (Ex. E:0025; Ex. R: 0151.)

2. **Ex parte restraints as leverage.** In December 2021, Defendants procured ex parte TRO/OSC restraints—including restraints on bankruptcy filing related to the marital home—before any noticed adversarial hearing. (Exs B:0006-0009; D:0018-0020.)

3. **Non-pertinent "abduction" rhetoric at civil calendars.** On March 19, 2024 and October 15, 2024—calendars noticed for modification/OSC—Defendant injected NRS 200.359 "abduction" rhetoric without a noticed NRS 125C vehicle. (Exs. A:0002, F:0028-0051, J:0101.)

4. **Discovery of full injury.** The July 2024 censure clarified the role of Defendant's conduct and the scope of harm, triggering accrual under Nevada's discovery rule. (Ex. N:0113-0114.)

5. **Service via e-service.** Defendant and counsel were served via the Court's e-service system. (Ex. S:0154.)

LEGAL STANDARD

Anti-SLAPP is a two-step test: (1) movant must show the claims are "based upon a good-faith communication made in direct connection with an issue under consideration," NRS 41.660(3)(a), defined in NRS 41.637; (2) only then does the burden shift to Plaintiff to show a probability of prevailing. Nevada recognizes abuse of process: (1) an ulterior purpose; and (2) a

willful act not proper in the regular conduct of the proceeding. *LaMantia v. Redisi*, 118 Nev. 27, 30, 38 P.3d 877, 879 (2002).

ARGUMENT

I. Prong One Fails: The gravamen is misuse of process, not protected communications.

Defendant's theme treats every wrongdoing as a "communication." The complaint targets how judicial machinery was procured and deployed: (i) off-record chambers direction to file an OSC (leave the fee line blank), and (ii) ex parte restraints wielded as leverage. Those are uses of process, not protected speech—so NRS 41.660(3)(a) is not satisfied. (Exs. E:0025, B:0006, D:0018-0020.)

II. "Abduction" wasn't a noticed issue and cannot supply pertinence or good faith.

Under NRS 125C.0035, "abduction" bears on custody only via the statute's exclusive path (noticed evidentiary hearing, clear-and-convincing proof, and written findings) or a qualifying conviction/plea/admission. None occurred. Allegations in counsel's papers do not create calendar notice. Injecting NRS 200.359 into modification/OSC settings was collateral to the noticed issues, which defeats both "direct connection" and any showing of "good faith." (Exs. A:0002, F:0028, J:0101.)

III. Abduction Allegations Were Not Pertinent and Pleadings Cannot Manufacture Notice

Defendant's theory is that by citing NRS 200.359 in custody pleadings, he "noticed" Plaintiff for abduction and therefore made his accusations pertinent (and privileged). That is backwards. Pleadings do not create calendar notice, jurisdiction, or facts—courts do. And when counsel drops a criminal statute into a civil modification/OSC setting to steer the forum

toward an issue it cannot adjudicate, that is not protected petitioning; it is collateral misuse of process.

A. NRS 125C.0035 provides the exclusive vehicle

The Legislature prescribed the only way "abduction" may bear on custody: either (1) a noticed evidentiary hearing with clear-and-convincing proof and written findings (subsection 7), or (2) conclusive proof of a qualifying conviction, plea, or admission (subsection 8). None occurred here. Because the statutory predicates were absent, "abduction" was not pertinent to the custody matter.

B. Family court cannot adjudicate criminal statutes

NRS 200.359 is a criminal statute; only the State can prosecute it. Family court lacks jurisdiction to determine criminal guilt or *mens rea*. Injecting criminal law into a civil custody calendar was jurisdictionally extraneous and procedurally unfair—a way to taint the tribunal with inflammatory branding without the safeguards of criminal procedure. This is the very definition of "an ulterior purpose plus an improper act" that constitutes abuse of process.

C. Pleadings do not create calendar notice or facts

Anti-SLAPP and privilege apply only to statements made "in direct connection with an issue under consideration." *Shapiro v. Welt*, 133 Nev. 35, 38, 389 P.3d 262, 268 (2017). What is "under consideration" is what the court noticed for hearing, not what a lawyer unilaterally injects. A custody NJT/OSC is not a vehicle to adjudicate criminal abduction. To hold otherwise would let litigants transform bare allegations into "issues" by citation alone, collapsing prong one into a formality.

D. Good faith requires more than labeling

Prong one requires a "good faith communication … in direct connection with an issue under consideration." NRS 41.660(3)(a); *Coker v. Sassone*, 135 Nev. 8, 11, 432 P.3d 746, 749 (2019). Dropping NRS 200.359 into pleadings—knowing the statutory predicates were absent and jurisdiction lacking—was not good faith. It was knowingly collateral. Defendant's own stipulation (Exs. G:0054-0055, F:0028) showed it was his client, not Plaintiff, who violated compliance, yet he pressed abduction anyway. That defeats any claim of good faith.

E. Policy: his "notice" is notice of abuse

If Defendant's theory were accepted, any lawyer could immunize misconduct by citing a criminal statute in family pleadings and then insist that "the wrong statute doesn't matter." That would nullify NRS 125C.0035's gatekeeping function, deprive parents of notice, and prejudice custody proceedings with criminal stigma the court had no jurisdiction to adjudicate. In reality, Defendant's citation to NRS 200.359 was not "notice of abduction" but notice of abuse—an attempt to weaponize process for collateral leverage.

Bottom line: Abduction was not noticed under NRS 125C.0035, family court could not adjudicate NRS 200.359, and pleadings cannot manufacture notice or facts. Defendant's criminal citations were collateral surplusage evidencing abuse of process, not protected communications. Prong one is therefore unsatisfied.

IV. Litigation privilege does not swallow abuse of process (and still requires pertinence)

Defendant leans on broad privilege language, but privilege cannot supply what is missing. As shown above (Section III), "abduction" was never a noticed issue under NRS 125C.0035 and pleadings cannot manufacture jurisdiction or calendar notice. Privilege

presupposes pertinence; it does not apply to collateral, extraneous branding outside the court's jurisdiction. *Greenberg Traurig v. Frias Holding Co.*, 130 Nev. 627, 630, 331 P.3d 901, 903 (2014).

Nor does privilege extend to the procurement and deployment of process for collateral aims. See *Fink v. Oshins*, 118 Nev. 428, 433, 49 P.3d 640, 644 (2002). Defendant's conduct—off-record directives, ex parte restraints leveraged for property pressure, and criminal citations in non-125C calendars—was misuse of judicial machinery, not privileged communication. At minimum, whether those acts were pertinent or in good faith presents fact issues fatal to dismissal at prong one.

V. Defendant's Self-Serving Declaration Does Not Establish Good-Faith Communication

Evidentiary Objection to the Grimes Declaration

To the extent the Court considers Defendant's declaration, Plaintiff objects. A declaration cannot carry prong one where it offers only conclusory legal assertions—e.g., that all conduct was "good faith" and "without knowledge of falsity." Such statements are not admissible evidence but self-serving legal conclusions, which courts routinely disregard. See *Club Vista Fin. Servs., LLC v. Eighth Judicial Dist. Court*, 128 Nev. 222, 228, 276 P.3d 246, 249 (2012) (conclusory statements insufficient to meet burden). Likewise, a declaration is impeached when contradicted by independent documentary evidence, as here. Prior adjudications (federal contempt order; State Bar admonition) and contemporaneous record (March 15, 2023 Childs email; March 19 & Oct. 15, 2024 transcripts) directly contradict Grimes's assertions. At prong one, the moving party must show by a preponderance that the claim arises from a good-faith communication, NRS 41.660(3)(a); conclusory self-attestations cannot suffice. The Court should therefore give the declaration little or no weight.

Rebuttal to the Grimes Declaration

Defendant Grimes submits a declaration (Ex. 1 to his Motion) asserting that all of his actions in December 2021 and in the March and October 2024 custody hearings were routine, docketed filings and courtroom advocacy conducted "in good faith" and "without knowledge of falsity." That declaration cannot carry prong one, nor can it defeat Plaintiff's prima facie showing, for the following reasons:

1. **Omissions**: Grimes's declaration never denies the central allegation—that he acted on off-record chambers instructions in preparing and filing an OSC, including an instruction to leave the attorney's-fees line blank. Such conduct is not reflected on the docket and cannot be laundered through references to routine "applications."
2. **Contradictions**: The declaration claims good-faith, routine filings, but contemporaneous evidence contradicts it. The March 15, 2023 Childs email (Ex. P:0136) documents off-the-record directives from chambers. The March 19 and October 15, 2024 transcripts show Grimes leveling criminal abduction allegations (NRS 200.359) during civil custody proceedings—statements contradicted by the parties' own stipulation and wholly outside the NRS 125C.0035 procedure
3. **Conclusory Assertions**: A blanket statement of "good faith" is a legal conclusion, not admissible evidence. Good faith is a fact issue for the trier of fact. The declaration offers no explanation why criminal rhetoric was used in non-125C calendars, nor why off-calendar channels were employed instead of regular noticed applications.

4. **Impeachment by Record**: Grimes's claim of "always good faith" is inconsistent with prior adjudications. On March 4, 2023, he was held in contempt by federal bankruptcy court. On March 1, 2024, the State Bar of Nevada publicly admonished him for violations of RPC 1.1 Competence, 3.1 Meritorious Claims and Contentions, 3.2 Expediting Litigation, 4.4 Respect for Rights of Third Persons, and 8.4 Misconduct. These adjudications directly undermine the credibility of his self-serving affidavit.
5. **Privilege and Pertinence.** The declaration relies on litigation privilege, but privilege applies only to communications pertinent to noticed issues. Here, "abduction" was not noticed under NRS 125C.0035. Pleadings do not supply calendar notice, and without a statutory vehicle, criminal rhetoric was collateral and extraneous.
6. **"By the Book" Claim.** Grimes asserts everything was regular. Yet "regular conduct" means noticed, adversarial, and on the record. Off-calendar chambers directives, ex parte leverage, and blank-fee-line instructions are the opposite and meet the "improper act" element of abuse of process.
7. **Legitimate Objectives Do Not Defeat Ulterior Purpose.** Grimes suggests that because custody or property were legitimate topics, his aims could not be ulterior. But abuse of process turns on using legal machinery for collateral ends. The sequence—bankruptcy restraint, property leverage, and criminal branding—demonstrates collateral purpose.
8. **Judicial Signature Does Not Break Causation.** The declaration implies that judicial orders cleanse his conduct. But abuse of process attaches to

procurement and use of process. A judge's signature does not absolve irregular procurement or collateral misuse.

9. **Statute of Limitations.** The declaration points to December 2021 filings as time-barred. But the discovery rule, continuing-conduct doctrine, and 2024 acts keep the claims timely. Limitations defenses present factual issues not suited for prong-one resolution.
10. **Preclusion and Retaliatory Label.** Grimes characterizes this case as a disguised appeal or retaliation. Plaintiff seeks damages for Defendant's misuse of process, not review of custody rulings. Nevada law allows independent tort remedies even when trial courts could sanction misconduct. The family appeal proceeds separately.
11. **Attorney-Agent Immunity.** The declaration implies his role as counsel shields him. But attorneys can be liable for independent torts, including abuse of process. Agency is not a defense to deliberate misuse of judicial machinery.

In sum, the Grimes Declaration is incomplete, conclusory, contradicted by record evidence, and undermined by prior adjudications. It cannot establish that Plaintiff's claims arise from good-faith communications, nor can it defeat Plaintiff's prima facie showing of abuse of process. The Court should therefore accord it little weight in evaluating prong one or prong two.

VI. *Noerr-Pennington*/petitioning immunity does not apply; the sham/abuse exception fits

If recast as petitioning immunity, steps that are **objectively baseless** and pursued for **improper, collateral ends** (e.g., off-record direction, ex parte restraints aimed at foreclosure of bankruptcy rights/property leverage) fall within the sham exception. Anti-SLAPP still fails at prong one.

VII. Mischaracterization corrected: the gravamen is not an "application"—it is the off-record chambers instruction

Defendant now claims the gravamen is a December 17, 2021 "application." Not so. By his own description, he received a chambers message telling him to file an OSC and leave the fee line blank—direction that appears nowhere in a minute order or docket entry submitted by Defendant. He attaches no "application" proving otherwise. The actionable misconduct is the undocketed directive and its deployment. Invoking a broadly legitimate topic does not defeat the ulterior-purpose element. Abuse of process turns on using legal machinery to achieve a collateral end the process was not designed to accomplish. The sequence here—bankruptcy restraints, property leverage, and criminal branding in non-§ 125C calendars—shows collateral aims, not regular adjudicatory use. Even if ex parte applications and ensuing orders exist on the docket, what makes this tort actionable is the undocketed chambers instruction (e.g., to file an OSC and leave the fee line blank) and the collateral use of that ex parte restraint—conduct not reflected in any noticed minute order or calendar setting.

VIII. "Good-faith reliance on court direction" is not dispositive

Reliance on a judge's later signature does not sanitize how process was procured (off-record messaging) or used (ex parte leverage). Whether reliance was in good faith is a fact question inappropriate for Anti-SLAPP.

IX. Judicial signature is not a superseding cause

Abuse of process attaches where a party procures and wields process for improper ends. A court's order is not a superseding cause when the party engineered the restraint via irregular, ex parte means and then leveraged it.

X. Agent-immunity and "attorney acting for a client" do not bar liability

Nevada permits tort liability where attorneys independently commit torts (including abuse of process) or conspire with non-clients. Agency status is not a blanket shield for misuse of judicial machinery.

XI. "Disguised appeal"/preclusion is inapposite

This action seeks damages for independent torts and does not seek to alter the family-court rulings; the family appeal proceeds separately. Sanctions in the underlying case are not an exclusive remedy; Nevada law permits independent tort recovery for a party's misuse of judicial machinery. And this action does not seek to alter family-court rulings; it seeks damages for how Defendant procured and deployed process. The family appeal proceeds on its own track.

XII. Statute of limitations does not bar the claim

Accrual follows the discovery rule. *Siragusa v. Brown*, 114 Nev. 1384, 971 P.2d 801 (1998). The July 2024 censure revealed the true extent and cause of injury; misconduct continued into 2024. At minimum, accrual/tolling present fact issues.

XIII. Service was proper

E-service on counsel of record satisfies NRCP 5(b)(2)(E). Receipts are lodged (Ex. S).

XIV. Amendments are not gamesmanship and do not change prong one

Amendments ensure the pleadings reflect Plaintiff's full legal knowledge as the record clarified. Nevada policy favors resolution on the merits. See NRCP 15(a)(2); *Foman v. Davis*, 371 U.S. 178 (1962). In any event, prong one turns on the acts already pled.

Even if the Court analyzes the operative pleading as the Third Amended Complaint while Anti-SLAPP is pending, the result is the same: prong one fails because the

gravamen is the procurement and deployment of process (off-record OSC direction; ex parte restraints) rather than protected communications. Resolving the amendment issue is unnecessary to deny the motion at step one.

XV. Alternative (only if reached): targeted discovery for good cause

If the Court prefers a fuller record, NRS 41.660(3)(e) allows narrow discovery to decide the motion. Limit to non-privileged facts essential to prong one: (i) who/when/how chambers communicated; (ii) whether any minute entry exists; (iii) how the TRO/OSC were obtained/used; and (iv) the scope/pertinence of "abduction" rhetoric.

CONCLUSION

Defendant has not met his threshold burden under NRS 41.660. Plaintiff's claims arise from misuse of judicial machinery, not protected communications. "Abduction" was not noticed under NRS 125C.0035, and pleadings cannot manufacture calendar notice or facts. Criminal citations in civil custody calendars were collateral surplusage evidencing abuse of process. Privilege does not apply without pertinence and does not sanitize off-record directives or ex parte leverage. Defendant's declaration is conclusory, contradicted, and impeached by prior contempt and bar admonition. At minimum, fact issues regarding good faith and pertinence preclude dismissal at prong one.

The Special Motion should therefore be DENIED, and Defendant's fee request rejected. Alternatively, if the Court wishes a fuller record, narrowly tailored discovery into chambers communications, OSC/TRO procurement, and the scope of "abduction" rhetoric should be authorized under NRS 41.660(3)(e).

NOTICE OF LODGMENT OF EXHIBITS A–U
AND REQUEST TO SEAL/IN CAMERA REVIEW WHERE INDICATED

Plaintiff lodges Exhibits A–U as identified below. Items containing confidential family-court content are submitted under seal for in camera review. Public-record items are attached openly.

Exhibit Index (A–U)

A. Minute Order, *Gonzalez v. Velazquez-Gonzalez*, No. D-18-575860-D (Nev. Dist. Ct., Fam. Div., Clark Cnty., Dept. X, Mar. 19, 2024 & Oct. 21, 2024) (setting NJT/modification and OSC). [Seal/In Camera]

B. Order to Show Cause, *Gonzalez v. Velazquez-Gonzalez*, No. D-18-575860-D (Nev. Dist. Ct., Fam. Div., Clark Cnty., filed Dec. 20, 2021). [Seal/In Camera]

C. Minute Entries re OSC/TRO Proceedings, *Gonzalez v. Velazquez-Gonzalez*, No. D-18-575860-D (Nev. Dist. Ct., Fam. Div., Clark Cnty., various dates surrounding OSC/TRO). [Seal/In Camera]

D. Ex Parte Temporary Restraining Order, *Gonzalez v. Velazquez-Gonzalez*, No. D-18-575860-D (Nev. Dist. Ct., Fam. Div., Clark Cnty., entered Dec. 16, 2021) (restraining Plaintiff prior to noticed hearing). [Seal/In Camera]

E. Tr. of Proceedings *In re Luba Snow*, *Case No. 21-15676-nmc* (Bankr. D. Nev. Mar. 4, 2022) (chambers message; instruction to leave attorney-fees line blank).

F. Trs. of Proceedings, *Gonzalez v. Velazquez-Gonzalez*, No. D-18-575860-D (Nev. Dist. Ct., Fam. Div., Clark Cnty., Mar. 19**,** 2024 & Oct. 15, 2024) (calendars were modification/OSC; "abduction" rhetoric noted as non-pertinent). [Seal/In Camera]

G. Stipulation(s) and Supporting Materials, *Gonzalez v. Velazquez-Gonzalez*, No. D-18-575860-D (Nev. Dist. Ct., Fam. Div., Clark Cnty., filed Mar. 21, 2023) (showing misstatements). [Seal/In Camera]

H. Def.'s Opp'n to Pl.'s Mot. for Order to Show Cause, and Mot. for Additional Orders (Talking Parents, Travel, Child's Last-Name Hyphenation, School Change, Att'y's Fees), and Countermotion for Modification of Custody (Sole Legal/Passport), *Gonzalez v. Velazquez-Gonzalez*, No. D-18-575860-D (Nev. Dist. Ct., Fam. Div., Clark Cnty., May 5, 2023). [Seal/In Camera]

I. Decl. of Luba Dace Authenticating Exs. A–H and Attesting to Lack of Notice Under NRS 125C.0035, *Gonzalez v. Velazquez-Gonzalez*, No. D-18-575860-D (Nev. Dist. Ct., Fam. Div., Clark Cnty., executed Sep. 12, 2025). [Public]

J. Docket (Excerpt), *Gonzalez v. Velazquez-Gonzalez*, No. D-18-575860-D (Nev. Dist. Ct., Fam. Div., Clark Cnty.) (as of Aug. 25, 2025) (showing no noticed NRS 125C.0035 vehicle). [Seal/In Camera]

K. Decl. of Luba Dace Re Absence of Criminal Charges/Convictions Under NRS 200.359 (executed Sep. 12, 2025).

L. Tr. of Proceedings at 39:13, *Gonzalez v. Velazquez-Gonzalez*, No. D-18-575860-D (Nev. Dist. Ct., Fam. Div., Clark Cnty., Mar. 19, 2024) (Q&A re alleged "Airbnb authorization"). [Seal/In Camera]

M. Decl. of Luba Dace Re Non-Authorization of Any "Airbnb Authorization" Letter by Attorney Childs (executed Sept. 12, 2025). [Seal/In Camera]

N. State Bar of Nevada, Public Admonition/Censure Materials re Mary Perry (July 18, 2024). [Public]

O. [Federal Court] Contempt Materials, *In re Luba Snow*, *Case No. 21-15676-nmc* (Bankr. D. Nev. Mar. 4, 2022). [Public]

P. E-mails Between Melvin Grimes & Ben Childs Following Off-the-Record Conference with the Court (Mar. 15, 2023) (subject lines/timestamps as shown) (on file with Plaintiff). [Public/Seal as needed]

Q. Subpoenas/Outreach to School Staff [redacted] (Mar. 12, 2024) (illustrating collateral misuse), *Gonzalez v. Velazquez-Gonzalez*, No. D-18-575860-D. [Seal/In Camera]

R. Records-Search/Clerk Certification Showing No Record of Directive to "Leave Attorney-Fees Line Blank," *Gonzalez v. Velazquez-Gonzalez*, No. D-18-575860-D (Nev. Dist. Ct., Fam. Div., Clark Cnty., search dated Aug. 25, 2025). [Public]

S. Electronic Service Receipts/Confirmations (e.g., Wiznet/efileNV) Reflecting Service Through Counsel of Record (various dates). [Seal/In Camera]

T. State Bar of Nevada, Public Admonition of Melvin Grimes (signed) (March 1, 2024). [Public]

U. State Bar of Nevada, Public Admonition of Amanda Roberts (signed) (December 29, 2023). [Public]

Sealing request. Plaintiff requests that Exhibits marked [Seal/In Camera] be filed under seal and reviewed in camera due to family-court confidentiality and minor-child information.

VERIFICATION

I, **Luba Dace**, declare under penalty of perjury under the laws of the State of Nevada that the factual statements herein made on personal knowledge are true and correct, and that the exhibits referenced are true and correct copies.

Dated: September 12, 2025

/s/*Luba Dace*

Luba Dace, Plaintiff in Proper Person

[redacted]

[redacted]

CERTIFICATE OF SERVICE

I certify that on September 12, 2025, I served the foregoing Plaintiff's Consolidated Opposition to Defendant Grimes's Special Motion to Dismiss under NRS 41.660 and Supplement; and Notice of Lodgment of Exhibits A–U via the Court's e-filing/e-service system on all counsel and parties of record.

/s/*Luba Dace*

Luba Dace