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Steven D. Grierson
CLERK OF THE COURT

LUBA SNOW DACE
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Pro Per

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

LUBA SNOW DACE, Plaintiff, v. MELVIN GRIMES, BENJAMIN CHILDS, LAW OFFICE OF BENJAMIN B. CHILDS, ROBERTS STOFFEL FAMILY LAW, Defendants.	Case No.: A-25-922833-C Dept. No.: 29 **PLAINTIFF'S OBJECTION TO FORM OF FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER (EDCR 7.21)**

Plaintiff **LUBA DACE**, in proper person, objects to the **form** of the Findings of Fact, Conclusions of Law, and Order ("FFCL") submitted by Defendants and filed on September 29, 2025, on the grounds that the written FFCL **does not accurately reflect the Court's oral rulings** made at the September 23, 2025 hearing, in violation of **EDCR 7.21**.

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Case Number: A-25-922833-C

I. STANDARD

EDCR 7.21 requires that proposed orders **accurately reflect the Court's ruling**. Counsel may not insert findings or conclusions that were **not stated by the Court** on the record.

II. SPECIFIC OBJECTIONS TO CONCLUSIONS OF LAW THAT WERE NOT RULED UPON

Plaintiff objects to the inclusion of the following conclusions, which were **not made by the Court at the hearing**:

1. **Conclusion ¶3 (quelling speech):** The Court made **no finding** that Plaintiff filed this action to quell Defendants' speech.
2. **Conclusion ¶4 (Grimes declaration satisfies prong one):** The Court **did not mention** Grimes declaration or make any finding regarding it.
3. **Conclusion ¶5 (prong one/prong two satisfied):** The Court **did not rule** on **prong one** or **prong two** under NRS 41.660; therefore, no burden can be deemed met.
4. **Conclusion ¶6 (SOL/double recovery/issue preclusion):** The Court made **no findings** on statute of limitations, double recovery, or issue preclusion.
5. **Conclusion ¶7 (absolute litigation privilege):** The Court made **no specific findings** that litigation privilege disposes of Plaintiff's claims.
6. **Conclusion ¶9 (discovery solely with another party):** The Court made **no finding** that discovery is solely in another party's possession or that Plaintiff failed to justify discovery.
7. **Conclusion ¶10 (sanctions up to $10,000 under NRS 41.670):** The Court **never mentioned** any $10,000 sanction or fine.

Because these conclusions were not articulated by the Court, their inclusion **misstates the record** and is improper under EDCR 7.21.

III. REQUESTED RELIEF

Plaintiff respectfully requests that the Court:

A. **Strike** from the FFCL the portions listed above that were **not ruled upon** at the hearing;

B. Direct Defendants to submit a **revised, limited order** that mirrors the Court's actual oral rulings; **or**, in the alternative, set a short **settle-order conference** so the Court can dictate the order's precise language on the record;

C. **Defer any fee/sanctions proceedings** under NRS 41.670 until the form of order accurately reflects the Court's rulings and until resolution of Plaintiff's pending **NRCP 59(e) Tolling Motion for Reconsideration** filed contemporaneously; and

D. Grant such other and further relief as is just and proper.

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IV. NOTICE OF RELATED FILING

Plaintiff has contemporaneously filed a **NRCP 59(e) Tolling Motion for Reconsideration**, which challenges the **substantive** legal errors in the FFCL (failure to make prong one/prong two findings, misapplication of privilege/SOL, and mismatch between the written order and the hearing record). This **objection to form** is directed solely to ensuring the **written order matches the actual rulings**.

DATED this 10th day of October 2025.

Respectfully submitted,

/**s**/*Luba Snow Dace*___
LUBA SNOW DACE,
Pro Per

[redacted]

CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2025, I served the foregoing **Plaintiff's Objection to Form of Findings of Fact, Conclusions of Law, and Order (EDCR 7.21)** via the Court's e-filing system (and by email, where applicable) on all counsel and parties of record.

*/**s**/Luba Snow Dace*
LUBA SNOW DACE
[redacted]