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DISTRICT COURT  
CLARK COUNTY, NEVADA

[REDACTED]  
Plaintiff,  
  
v.  
  
TODD MATTHEW PHILLIPS,  
Defendant.

Case No: D-18-[REDACTED]-D  
Dept. No: X

**ORDER TO SHOW CAUSE WHY DEFENDANT TODD MATTHEW PHILLIPS  
SHOULD NOT BE DEEMED A VEXATIOUS LITIGANT**

**TO: DEFENDANT, TODD MATTHEW PHILLIPS**

You are hereby ordered to appear in District Court, 200 Lewis Avenue, Department X on January 30, 2025 at 2:30 PM to show cause why you should not be deemed a vexatious litigant under N.R.C.P. 11. The hearing will consider the factors enumerated by the Nevada Supreme Court in *Jordan v. State ex rel. Dept. of Motor Vehicles*,<sup>1</sup> which factors are:

1. The litigant must be provided with reasonable notice an opportunity to oppose a restrictive order so as to protect the litigant’s due process rights;
2. The district court must create an adequate record for review, including a list of all cases and documents or an explanation leading the court to conclude a restrictive order was necessary to curb the litigant’s repetitive or abusive actions. The court must identify the documents filed in a particular case and explain how the litigant abused the court system by filing them;

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<sup>1</sup> 121 Nev. 44, 59-62, 110 P.3d 30, 41-44 (2005), abrogated by *Buzz Stew, LLC v. City of N. Las Vegas*, (2005)(internal citations omitted), abrogated by *Buzz Stew, LLC v. City of N. Las Vegas*, 124 Nev. 224, 181 P.3d 670 (2008).

1 3. The district court must make “substantive findings as to the frivolous or harassing  
2 nature of the litigant's actions;” and

3 4. The order must be narrowly drawn to address the specific problem posed by the  
4 litigant’s actions.

5 This is a post-judgment divorce proceeding involving NO minor children; the child of  
6 the marriage, [REDACTED] born [REDACTED] 2005, (age 19) emancipated.

7 Since Plaintiff [REDACTED] filed her October 5, 2018 Complaint for  
8 Divorce, Defendant Todd (Todd) Phillips has filed numerous motions that are not supported by  
9 law, fail to state claims for relief, and/ or are not actionable legal claims, and lack specific  
10 factual allegations. Specifically from November 12, 2018 to December 12, 2024, Todd filed  
11 one hundred two (102) separate motions or requests seeking relief.<sup>2</sup> This includes individual  
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15 <sup>2</sup> The following are the dates Todd filed documents resulting in separate Clerk’s Notices of  
16 Hearings being issued as a result of the motion or request. When a date is listed repeatedly, it  
17 indicates Todd filed more than one motion or request on that date: November 12, 2018; January  
18 14, 2019; January 18, 2019; January 24, 2019; April 1, 2019; April 2, 2019; April 5, 2019; April  
19 8, 2019; April 14, 2019; May 3, 2019; May 8, 2019; May 12, 2019; May 16, 2019; August 19,  
20 2019; August 21, 2019; October 15, 2019; October 18, 2019; October 28, 2019; December 13,  
21 2019; December 18, 2019; December 23, 2019; December 23, 2019; December 25, 2019;  
22 February 12, 2020; February 25, 2020; February 25, 2019; February 25, 2019; February 25,  
23 2019; March 4, 2020; March 14, 2020; March 14, 2020; March 20, 2020; June 17, 2020; June  
24 22, 2020; June 24, 2020; June 24, 2020; September 15, 2020; October 12, 2020; October 19,  
25 2020; November 2, 2020; November 10, 2020; November 18, 2020; June 16, 2021; June 17,  
26 2021; July 4, 2021; July 12, 2021; July 28, 2021; July 28, 2021; September 16, 2021; October 5,  
27 2021; February 16, 2022; March 8, 2022; March 12, 2022; March 25, 2022; April 15, 2022;  
28 May 4, 2022; May 31, 2022; July 5, 2022; August 29, 2022; September 2, 2022; September 20,  
2022; September 28, 2022; October 6, 2022; October 15, 2022; October 21, 2022; October 25,  
2022; January 3, 2023; January 5, 2023; January 31, 2023; February 8, 2023; February 14,  
2023; February 28, 2023; April 19, 2023; August 29, 2023; September 16, 2023; October 19,  
2023; October 25, 2023; October 25, 2023; October 30, 2023; November 2, 2023; November 2,  
2023; November 3, 2023; November 3, 2023; January 19, 2024; January 19, 2024; January 24,  
2024; February 1, 2024; February 6, 2024; March 3, 2024; March 4, 2024; March 14, 2024;  
March 15, 2024; March 29, 2024; April 16, 2024; May 28, 2024; September 11, 2024;  
September 15, 2024; September 26, 2024; October 24, 2024; December 10, 2024; December 17,  
2024; and December 24, 2024.

1 thirteen (13) requests to disqualify judges.<sup>3</sup> Todd has also filed six (6) separate appeals or writs  
2 to the Nevada Appellate Courts related to this case since January 16, 2019.<sup>4</sup> Between March  
3 12, 2021 and May 7, 2024, Todd filed eleven (11) separate federal complaints, writs, or appeals  
4 in the United States District Court, District of Nevada related to this divorce case.<sup>5</sup> In the  
5 federal cases, Todd has sued five (5) different district court judges and two (2) hearing masters;  
6 the Nevada Attorney General; the CEO of the Eighth Judicial District Court; the Clark County  
7 District Attorney; [REDACTED] prior attorney, Shannon R. Wilson (attorney Wilson); Hutchinson  
8 and Steffen, LLC; a team chief of the District Attorney Family Support Division; a law clerk  
9 and judicial executive assistant to a district court judge; Clark County; and the Eighth Judicial  
10 District Court.  
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12 District Court.

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21 <sup>3</sup> Todd filed requests or demands on: December 19, 2019; December 23, 2019; February 12,  
22 2020; October 19, 2020; September 16, 2021; March 12, 2022; May 4, 2022; September 2,  
23 2022; October 15, 2022; October 21, 2022; August 29, 2023; January 19, 2024; and March 29,  
24 2024.

25 <sup>4</sup> Appellate case/docket numbers 77900; 78959; 79709/79709-COA; 82414; 82693; and 82724.

26 <sup>5</sup> Case 2:2019cv00425, Todd Matthew Phillips v. [REDACTED] Hon. Linda Marquis, in Her  
27 Honor's Official Capacity as Judicial Officer; Hon. Jennifer Henry, in Her Honor's Official  
28 Capacity as Judicial Officer; Hon. Timothy Andrews, in His Honor's Official Capacity as  
Judicial Officer; Does 1 – 10, (filed March 12, 2019); and case 2:2024cv00859, T. Matthew  
Phillips v. Bill Henderson (filed May 7, 2024).

1 The Court notes that Todd repeatedly stated in written communications to attorney  
2 Wilson his intent was to harass, delay and needlessly increase the cost of litigation.<sup>6</sup> In a May  
3 16, 2019, email to attorney Wilson, Todd wrote, “Dealing with you and your client is  
4 impossible. Which explains why this litigation – and the soon-to-be-filed “spin off” litigations  
5 – will likely last 3 or 4 years. You will never give a straight answer. You are hard-wired to be  
6 deceptive. You should be a lawyer!! Oh, wait...”<sup>7</sup>

8 On March 28, 2019, Todd wrote in an email to attorney Wilson, “Expect a flurry of  
9 litigation. And you’ll not be paid a thin dime for any of your work. #Guaranteed.”<sup>8</sup>

10 On August 25, 2021, Todd wrote in an email to attorney Wilson, “I have a new lawsuit  
11 for you. Will you accept service of process? Or maybe we should make this as expensive as  
12 possible. You’re [sic] already lost \$179,000 in attorney’s fees. How long are you willing to  
13 work for free?”<sup>9</sup>

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20 <sup>6</sup> The Court FINDS it is proper to consider the exhibits because Todd’s March 8, 2022 Motion  
21 for Relief from Two (2) Orders Dated September 9, 2021 and ██████████ March 14, 2022  
22 Opposition to Respondent’s Motion for Relief from Two Orders Dated September 9, 2021 and  
23 Countermotion for Attorney’s Fees and Costs were never adjudicated due to Todd’s constant  
24 requests for judicial disqualifications and appellate activity causing the district court to be  
25 deprived of jurisdiction.

26 <sup>7</sup> See Appendix of Exhibits in Support of Plaintiff’s Opposition to Respondent’s Motion for  
27 Relief from Two Orders Dated September 9, 2021 and Countermotion for Attorney’s Fees and  
28 Costs at Exhibit 1 at p.PLTF001458 (filed March 14, 2022).

<sup>8</sup> Id. at Exhibit 4 at p.PLTF000737.

<sup>9</sup> Id. at Exhibit 2 at p.PLTF001457.

1 On December 22, 2021, Todd wrote in an email to attorney Wilson,

2 “I’m going to be doing some more slash ‘n [sic] burn litigation, the kind to which  
3 you’ve grown accustomed, the kind for which you won’t be paid. But don’t tripp [sic]; I  
4 won’t get paid neither. So before the parties spend inordinate amounts of time and  
5 money that will never be recovered, is there any remote possibility you can prevail upon  
6 your stubborn client? I need a phone call from [REDACTED]”<sup>10</sup>

7 In addition to Todd’s stated harassing and vexatious motivations for filing his various  
8 lawsuits, motions, and other papers, Judge Henderson determined Todd to be, “among the most  
9 obsessed and uncontrollable of vexatious litigants” and referred the matter to the Attorney  
10 General for review.<sup>11</sup>

11 Since the case was reassigned to Department X on November 5, 2024, Todd has filed a  
12 December 24, 2024 Request for Disclosures from Sitting Judge [docket entry 579], and two (2)  
13 additional motions: December 10, 2024 Motion for Extension of Time to File Opposition  
14 [docket entry 573] and December 17, 2024 Second Motion for Extension of Time to File  
15 Opposition [docket entry 577]. The Court FINDS the December 24, 2024 Request for  
16 Disclosures is not a properly filed motion, is not set of for hearing before the Court nor a  
17 properly made request.

18 In his December 10, 2024 Motion, Todd requested until December 17, 2024 to file an  
19 opposition and stated, “with two foes, any hope of stipulation is exponentially impracticable.”<sup>12</sup>  
20 Within twenty-eight (28) minutes of Todd filing his motion, Our Nevada Judges filed a Non-  
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25 <sup>10</sup> Id. at Exhibit 1 at p.PLTF001458.

26 <sup>11</sup> See at p.11, ll.20-23 (filed June 17, 2024).

27 <sup>12</sup> See Motion for Extension of Time to File Opposition at p.2, ll.5-6; and p.3, ll.11-12 (filed  
28 December 10, 2024).

1 Opposition to Motion for Extension of Time; ten (10) hours later, ██████ filed her non-  
2 opposition, stating she would have stipulated to an extension if asked.<sup>13</sup> Rather than submitting  
3 a proposed order to chambers, Todd did nothing. On December 17, 2024, Todd filed his second  
4 motion, requested until December 24, 2024 to file his opposition, and repeated the same line  
5 about stipulation being impracticable.<sup>14</sup> Again, Todd did not submit a proposed order to  
6 chambers. The Court NOTES Todd requested hearings on both of his motions, causing Clerk's  
7 Notices of Hearing to issue. On December 24, 2024, the second date Todd requested as a  
8 deadline to file his Opposition, Todd filed his Request for Disclosures. On December 30, 2024,  
9 the Court granted the November 26, 2024 Motion to Unseal filed by Our Nevada Judges as  
10 unopposed.<sup>15</sup> To date, Todd has not withdrawn his moot motions to clear the calendar, thereby  
11 clogging the Court with two additional needless hearing dates on January 30, 2025 and March  
12 11, 2025.<sup>16</sup>

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15 The following motions filed by Todd are scheduled for hearing before this Court on  
16 January 30, 2025:

- 17 1. Todd's September 11, 2024, Motion to Vacate Orders as Void [docket entry 549] in  
18 which he requested to have orders issued by Judge Ochoa declared void because  
19 Judge Ochoa was eventually disqualified from this case in September 2022.
- 20 2. Todd's September 26, 2024 Motion to Vacate the Chief Judge's Reverse and  
21 Remand Order in which Todd requested a district court judge vacate the Chief

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24 <sup>13</sup> See Plaintiff's Notice of Non-Opposition to Defendant's Motion for Extension of Time to  
25 File Opposition at p.1, ll.22-23 (filed December 11, 2024).

26 <sup>14</sup> See Defendant's Second Request for Extension of Time at p.3, ll.5-6 and 11-12 (filed  
27 December 17, 2024).

28 <sup>15</sup> See Order Granting Motion to Unseal Certain JAVS Videos (filed December 30, 2024).

1 Judge's order reversing and remanding Judge Bill Henderson's September 23, 2024  
2 voluntary recusal. This motion is not only mooted by Judge Henderson's October  
3 24, 2024 Order, it lacks factual and legal basis for relief due to Todd's  
misunderstanding of the law and civil procedure.

- 4 3. Todd's October 24, 2024 Motion for a Change of Venue [docket entry 566] in which  
5 Todd requested to have venue changed to a county in which Legal Aid Center of  
6 Southern Nevada is inactive because Todd believes Legal Aid Center of Southern  
7 Nevada represents ██████ in some capacity or is funded by the Eighth Judicial  
8 District Court in some capacity. The Court FINDS Todd filed free self-help forms  
9 provided by the Legal Aid Center of Southern Nevada Family Law Self Help Center,  
demonstrating he directly availed himself of and benefitted from the services of  
Legal Aid Center of Southern Nevada. The issue of LACSN's involvement has been  
repeatedly dealt with in this case.
- 10 4. Todd's December 17, 2024 Motion for Extension of Time to File Opposition  
11 (discussed above).

12 Of particular note and concern is Todd's status as an active licensed attorney in the State  
13 of California, something Todd insisted on listing in the caption of each of his one hundred and  
14 two (102) motions. Todd cannot use his status as a pro per litigant with an out of state law  
15 license as a sword and shield to engage in vexatious and harassing behavior. The Court NOTES  
16 ██████ through her pro bono counsel, consistently files timely oppositions and responses  
17 despite the flood of documents.

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1 If the Court finds Todd is a vexatious litigant, certain restrictions may be placed on  
2 Todd's use of the court as dictated by *Jordan*. These restrictions include, but are not limited to,  
3 requiring him to follow a special procedure before being able to file future complaints,  
4 completely barring Todd from filing complaints about certain subjects, and barring Todd from  
5 electronically filing documents with the Court.  
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7 *If Todd does not appear at the Order to Show Cause hearing, he may be deemed a*  
8 *vexatious litigant, his motions may be denied, and he may be found in contempt of court. If*  
9 *he is found in contempt of court, he may be fined up to \$500.00 or be sentenced to twenty-five*  
10 *(25) days in jail.*  
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13 Dated this 2nd day of January, 2025

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16 HEIDI ALMASE  
District Court Judge

17 B56 E2E 6E9D 2D4B  
18 Heidi Almase  
District Court Judge  
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