

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT
CIVIL APPEAL STATEMENT OF PARTIES AND ISSUES

Case No: 22-5912 Case Manager: Jennifer A. Strobel

Case Name: Chelsey Nelson Photography LLC et al v. Louisville/Jefferson County Metro Government et al

Is this case a cross appeal? Yes No

Has this case or a related one been before this court previously? Yes No

If yes, state:

Case Name: _____ Citation: _____

Was that case mediated through the court's program? Yes No

Please Identify the Parties Against Whom this Appeal is Being Taken and the Specific Issues You Propose to Raise:

This cross-appeal is being taken by Chelsey Nelson and her photography studio Chelsey Nelson Photography LLC (collectively "Chelsey") against Louisville/Jefferson County Metro Government and Louisville Metro Human Relations Commission-Enforcement (collectively "Louisville"). Chelsey challenged Louisville's public accommodations law because it violated her rights to free speech, expressive association, and free exercise under the First Amendment and Kentucky's Religious Freedom Restoration Act. Chelsey also challenged the law's Unwelcome Clause because it violated her Fourteenth Amendment rights to be free from laws that are vague, overbroad, and grant officials unbridled discretion. Chelsey cross-appeals the District Court's Final Judgment (Doc. 132) as to the following orders related to that judgment (1) the August 14, 2020 Order (Doc. 47) dismissing Chelsey's compensatory and nominal damages claims; (2) the August 30, 2022 Opinion & Order (Doc. 130) declining to facially enjoin or to declare facially unconstitutional the Unwelcome Clause; and (3) the September 2, 2022 Text Order (Doc. 131) denying Chelsey's motion to supplement the record as moot.

Chelsey will argue that the District Court's Final Judgment--and its orders related to that judgment--should otherwise be affirmed, based on the reasons given by the District Court as well as any alternative grounds raised below that support the judgment.

This is to certify that a copy of this statement was served on opposing counsel of record this 25 day of

October, 2022 .

Jonathan A. Scruggs

Name of Counsel for Appellant