

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF KENTUCKY  
LOUISVILLE DIVISION**

**Chelsey Nelson Photography LLC,  
and Chelsey Nelson,**

Plaintiffs,

v.

**Louisville/Jefferson County Metro  
Government and Louisville Metro  
Human Relations Commission-  
Enforcement,**

Defendants.

**Case No. 3:19-cv-00851-BJB-CHL**

**Notice of Cross-Appeal**

Notice is hereby given that Plaintiffs Chelsey Nelson Photography LLC and Chelsey Nelson cross-appeal to the United States Court of Appeals for the Sixth Circuit from the Final Judgment (Doc. 132) signed on September 1, 2022 and entered on September 2, 2022 as to the following orders related to that judgment: (1) the August 14, 2020 Order (Doc. 47) dismissing Plaintiffs' 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 Plaintiffs' motion to supplement the record as moot.

Respectfully submitted this 10th day of October, 2022.

By: s/ Jonathan A. Scruggs

Joshua D. Hershberger  
KY Bar No. 94421  
**Hershberger Law Office**  
P.O. Box 233  
Hanover, IN 47243  
Telephone: (812) 274-0441  
josh@hlo.legal

Ryan L. Bangert  
TX Bar No. 24045446\*  
Jonathan A. Scruggs  
AZ Bar No. 030505\*  
Katherine L. Anderson  
AZ Bar No. 033104\*  
Bryan D. Neihart  
AZ Bar No. 035937\*  
**Alliance Defending Freedom**  
15100 N. 90th Street  
Scottsdale, AZ 85260  
Telephone: (480) 444-0020  
rbangert@adflegal.org  
jscruggs@adflegal.org  
kanderson@adflegal.org  
bneihart@adflegal.org

Hailey M. Vrdolyak  
IL Bar No. 6333515\*  
**Alliance Defending Freedom**  
440 First Street NW, Suite 600  
Washington, DC 20001  
Telephone: (202) 393-8690  
hvrdoiyak@adflegal.org

David A. Cortman  
GA Bar No. 188810\*  
**Alliance Defending Freedom**  
1000 Hurricane Shoals Road NE  
Suite D-1100  
Lawrenceville, GA 30043  
Telephone: (770) 339-0774  
dcortman@adflegal.org

\* Admission *Pro Hac Vice*

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of October, 2022, I electronically filed the foregoing document with the Clerk of Court using the ECF system which will send notification of such filing to all counsel of record who are registered users of the ECF system.

By: *s/Jonathan A. Scruggs*

Jonathan A. Scruggs  
AZ Bar No. 030505\*  
Alliance Defending Freedom  
15100 N. 90th Street  
Scottsdale, AZ 85260  
Telephone: 480-444-0020  
bneihart@ADFlegal.org

*Attorney for Plaintiffs*  
\* Admitted *Pro Hac Vice*