

IN THE SUPREME COURT OF THE STATE OF NEVADA

JEFFERSON TYLER,
Petitioner,
vs.
THE SECOND JUDICIAL DISTRICT
COURT OF THE STATE OF NEVADA,
IN AND FOR THE COUNTY OF
WASHOE; AND THE HONORABLE
SANDRA A. UNSWORTH, DISTRICT
JUDGE,
Respondents,
and
LARA AREVALO TYLER,
Real Party in Interest.

No. 91752

FILED

DEC 22 2025

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY 
DEPUTY CLERK

ORDER DENYING PETITION FOR WRIT OF MANDAMUS

This petition for a writ of mandamus seeks clarification of and guidance concerning various procedural and judicial-conduct aspects of family court cases.¹ Primarily, petitioner raises concerns stemming from an evidentiary hearing on his emergency motion regarding the parties' children held more than two years ago, on December 1, 2023, and asks for guidance to inform future hearings. Petitioner asserts that he does not seek

¹Petitioner seeks emergency relief, asserting that the petition involves the safety and protection of minor children. Given the relief sought in the petition—clarification and guidance of procedural standards—we conclude that petitioner has not demonstrated that the failure to grant his petition within 14 days will result in irreparable harm, *see* NRAP 21(a)(6); NRAP 27(e), and thus, we decline to treat this matter as an emergency.

Petitioner's December 16, 2025, motion to waive the filing fees under NRAP 21(g) is granted, and the filing fee in this matter is waived.


review of factual determinations but rather asks the court to clarify or provide statewide procedural standards.

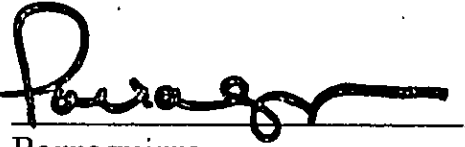
A writ of mandamus is available to compel a legally required act or to control a manifest abuse of discretion. *Halverson v. Miller*, 124 Nev. 484, 487, 186 P.3d 893, 896 (2008); see NRS 34.160. Whether a petition for writ relief will be entertained rests within this court's sound discretion, *D.R. Horton, Inc. v. Eighth Jud. Dist. Ct.*, 123 Nev. 468, 474-75, 168 P.3d 731, 736-37 (2007), and it is petitioner's burden to demonstrate that this court's extraordinary intervention is warranted, *Pan v. Eighth Jud. Dist. Ct.*, 120 Nev. 222, 228; 88 P.3d 840, 844 (2004). Notably, a writ of mandamus is available only when petitioner has no plain, speedy, and adequate legal remedy, such as an appeal. *Id.* at 224, 88 P.3d at 841; see NRS 34.170:

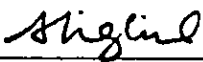
Having reviewed the petition and supporting documents, we are not convinced that our extraordinary intervention is warranted at this time. In particular, to the extent the procedural issues raised impact petitioner's interests in any final custody order, they can be raised on appeal. See NRAP 3A(b)(7); NRS 34.170; NRS 34.330; *Pan*, 120 Nev. at 224, 88 P.3d at 841 (recognizing that "the right to appeal is generally an adequate legal remedy that precludes writ relief"). Moreover, writ relief is not available when this court's decision would have no effect on some aspect of the case as it currently stands. *Johnston v. Eighth Jud. Dist. Ct.*, 138 Nev. 700, 703, 518 P.3d 94, 99 (2022); *Personhood Nev. v. Bristol*, 126 Nev. 599, 602, 245 P.3d 572, 574 (2010) ("This court's duty is not to render advisory opinions but, rather, to resolve actual controversies by an enforceable judgment."); cf. *Walker v. Second Jud. Dist. Ct.*, 136 Nev. 678, 684, 476 P.3d 1194, 1199 (2020) (explaining the requirements to seek

advisory mandamus). Here, petitioner does not seek to compel a legally required act or to control a manifest abuse of discretion but instead asks us to clarify standards for future proceedings.² Such a petition does not present justiciable issues. Finally, to the extent petitioner seeks an order directing the district court to resume jurisdiction over emergency child-safety matters despite the order of abeyance, that issue was addressed in the order resolving petitioner's prior petition, and his petition for supreme court review was recently denied, Docket No. 90986; no additional pertinent information has been provided in this petition. Accordingly, we

ORDER the petition DENIED.³


_____, C.J.
Herndon


_____, J.
Parraguirre


_____, J.
Stiglich

²To the extent, if any, the petition can be construed as seeking relief from the outcome of the hearing, it appears that laches would bar such relief. *Bldg. & Constr. Trades Council of N. Nev. v. State x rel. Pub. Works Bd.*, 108 Nev. 605, 611, 836 P.2d 633, 637 (1992) (describing the doctrine of laches as to a writ petition).

³In light of this order, petitioner's motion to transmit the original JAVS recording is denied as moot.

cc: Hon. Sandra A. Unsworth, District Judge, Family Division
Jefferson Tyler
Lara Arevalo Tyler
Washoe District Court Clerk