IN THE COURT OF APPEALS OF THE STATE OF NEVADA

IN THE MATTER OF THE ESTATE OF: STEVEN CHARLES HAREN.

WILLIAM D. SPARKS, JR.,
Appellant,
vs.
GINGER L. SIMPSON, NYE COUNTY PUBLIC ADMINISTRATOR,
Respondent.

No. 89369-COA

FILED
MAR 18 2026
ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY
DEPUTY CLERK

ORDER DISMISSING APPEAL

William D. Sparks, Jr., appeals from a district court order granting respondent's petition for confirmation of sale of real property in a probate case. Fifth Judicial District Court, Nye County; Kimberly A. Wanker, Judge.

This appeal concerns the intestate estate of William's stepfather, Steven Charles Haren. The primary asset of the estate was a home located in Pahrump, Nevada, which was owned by Steven and Stella Sparks—William's mother and Steven's wife—as joint tenants during their lifetimes. Steven had two biological children but did not legally adopt William prior to his death.

During the proceedings below, the district court appointed respondent Ginger L. Simpson, the Nye County Public Administrator, as the special administrator of Steven's estate. At that time, Simpson gathered the assets of the estate, including recording an "Affidavit – Death of Joint Tenant," which indicated that Stella predeceased Steven and died

in August 2022, effectively claiming that the property was Steven's separate property under the right of survivorship. Simpson then petitioned the court for confirmation of the sale of real property, representing that she had entered into a purchase agreement with a third party and had agreed to sell the property. After a hearing, the district court determined William failed to demonstrate that he had standing to object to the petition and granted the petition to confirm the sale of real property. The record before this court indicates that the real property has since been sold with the proceeds held in the estate for final distribution. William now appeals.

On appeal, William argues, among other things, that the district court erred when it determined that he lacked standing to participate in the probate of Steven's estate, and when it confirmed the sale of the real property. But this appeal is limited to the sale of the property and does not involve a final resolution as to the distribution of Steven's estate. As noted above, the record before us reveals that the real property in question has been sold to a third party. *See Personhood Nev. v. Bristol*, 126 Nev. 599, 602, 245 P.3d 572, 574 (2010) (stating that "even though a case may present a live controversy at its beginning, subsequent events may render the case moot"). And where, as here, the case involves a matter of real property, the subsequent sale of the property prevents an appellate court from granting any effective relief and will render the appeal moot. *See In re Mann*, 907 F.2d 923, 926 (9th Cir. 1990) (stating that a debtor's failure to obtain a stay in a foreclosure action "normally renders the appeal moot"); *Lathrop v. Sakatani*, 141 P.3d 480, 486 (Haw. 2006) (stating that "it is appellant's burden to seek a stay if post-appeal transactions could render the appeal moot" and that "the sale of the property prevents the appellate court from granting any effective relief" (internal citations omitted)); *see*

also Weddell v. H2O, Inc., 128 Nev. 94, 106 n.10, 271 P.3d 743, 751 n.10 (2012) (stating that the subsequent sale of real property would render issues related to a lis pendens on the property moot and citing to *Lathrop* with approval). Thus, this court is unable to grant effective relief related to the sale of the real property, and we therefore dismiss this portion of William's appeal as moot. *See Bristol*, 126 Nev. at 602, 245 P.3d at 574; *Lathrop*, 141 P.3d at 486.

William's remaining challenges relate to the district court's denial of his petition to proceed in forma pauperis and determination in that order that he lacked standing to proceed as Steven's heir. However, "[t]he decision of a court granting or denying an application to proceed as an indigent litigant filed pursuant to paragraph [NRS 12.015(1)(a)] is not appealable." NRS 12.015(7). Thus, to the extent William challenges the order denying his petition to proceed in forma pauperis, we dismiss that portion of his appeal for lack of jurisdiction.[1]

Accordingly, we

ORDER this appeal DISMISSED.

_____, C.J.
Bulla

_____, J.
Gibbons

_____, J.
Westbrook

[1]In doing so, we construe the district court's finding that William "has no standing to participate in this case, as he is no blood relation to the decedent who died intestate" to relate only to its prior decision to deny William's in forma pauperis petition. This court takes no position as to whether William has any other available means for relief in law or in equity.

cc: Hon. Kimberly A. Wanker, District Judge
William D. Sparks, Jr.
JK Nelson Law LLC
Nye County Clerk