



**MOT**  
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**DISTRICT COURT  
CLARK COUNTY, NEVADA  
FAMILY DIVISION**

XXXXXXXXXXXXXXXXXXXX	CASE NO: D-25-XXXXX-R
Petitioner,	DEPT NO: A
vs.	NO HEARING REQUESTED
BRADLEY BELLISARIO; Respondent.	
_____ /	

**MOTION TO UNSEAL CASE FILE**

NOTICE: YOU MAY FILE A WRITTEN RESPONSE TO THIS MOTION WITH THE CLERK OF THE COURT AND PROVIDE THE UNDERSIGNED WITH A COPY OF YOUR RESPONSE WITHIN 14 DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN 14 DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT A HEARING PRIOR TO THE SCHEDULED HEARING DATE.

COMES NOW, Our Nevada Judges, Inc., a Nevada non-profit corporation, by and through the undersigned counsel, and hereby files the following *Motion to Unseal Case File*.

1 This motion is based upon the following memorandum of points and  
2 authorities, and the exhibits attached hereto.

3  
4 **DATED** this May 17, 2026

5 By: /s/ Luke Busby  
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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 SCR 229(1)(c) permits a non-party news reporter to file a motion to  
3 unseal. SRCR 4(2). The case is monitored for electronic coverage by Our  
4 Nevada Judges, Inc. (hereinafter 'ONJ'). Justices of the Peace Elana  
5 Graham, Diana Sullivan, and Ann Zimmerman; and, District Court Judges  
6 Ellie Roohani, Crystal Eller, and Michael Villani; have already allowed  
7 comprehensive electronic coverage of Mr. Bellisario's myriad criminal  
8 proceedings. District Court Judge Robert Teuton unsealed JAVS videos of  
9 the corresponding divorce proceedings.  
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13 A total of 105 videos have been published, and these termination of  
14 parental rights proceedings present an opportunity for the public to learn of  
15 the judicial process, consistent with the Supreme Court's educational and  
16 informational mandate. SCR 241. A request to provide electronic coverage  
17 and deploy cameras to the upcoming January 21, 2027; February 5, 2027;  
18 and, February 12, 2027 hearing dates has been submitted in this case.  
19 Exhibit 1. In addition to access to the upcoming hearings, ONJ is  
20 requesting the entire case file be unsealed, and specifically the JAVS  
21 videos. This case lacks a sealing order, and the Clerk should also be  
22 directed to restore access to the court indices<sup>1</sup>, which District Court  
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28 <sup>1</sup> <https://www.clarkcountycourts.us/Anonymous/default.aspx> and  
<https://www.clarkcountycourts.us/portal>

1 Judges Vincent Ochoa, Mari Parlade, Robert Teuton, and Heidi Almase  
2 have already ordered in similarly covered cases, D-25-703770-P,  
3 D-20-607245-C, and D-21-621154-P, and D-18-570436-C; respectively.

4  
5 In order to justify sealing and courtroom closure, the First Amendment  
6 required judicial discretion to be exercised. *Falconi v. Eighth Jud. Dist. Ct.*,  
7 140 Nev., Advance Op. 8 (2024) (striking down NRS 125.080 and EDCR  
8 5.207 as unconstitutional). NRS 128.090(7)(b) provides a mechanism by  
9 which this Court may exercise its discretion, conduct the strict scrutiny  
10 analysis as the *Falconi Court* has mandated for all civil cases, including  
11 family court cases, and unseal the case file.

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14 Efforts to distinguish records and trust actions by the Rupert Murdoch  
15 News Corp trust parties failed, and the Supreme Court ruled, *en banc*, to  
16 emphatically articulate the requirement of the judiciary to consider  
17 statutory, constitutional, and common law principles when considering  
18 whether to close access to court proceedings and records, a failure of  
19 which has been ruled as a manifest abuse of discretion. *NY Times Co. v.*  
20 *Dist. Ct.(Doe 1 trust)*, 141 Nev. Adv. Op. 71 (Dec. 23, 2025).

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23 Specifically, the *NY Times Court* held:

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26 Weeks later, this court decided *Falconi*, in which we held  
27 that civil proceedings, and family court proceedings  
28 specifically, are presumptively open to the public under  
the First Amendment. 140 Nev., Adv. Op. 8, 543 P.3d 92.  
We determined that NRS 125.080 and certain local court

1 rules, which applied to either automatically close divorce  
2 proceedings or require closure and sealing of documents  
3 on a party's request, were unconstitutional. *Id.* at 100.  
4 We reasoned that the statute and rules improperly  
5 prevented the district court from exercising discretion to  
6 determine whether compelling privacy interests warrant  
7 closure and outweigh the First Amendment presumption  
8 of public access. *Id.* We later clarified in *Nester v. Eighth*  
9 *Judicial District Court* that the presumption of access  
10 under the First Amendment does not preclude the district  
11 court from considering closure; rather, the district court  
12 must determine on a case-by-case basis whether  
13 compelling reasons support closure and overcome the  
14 presumption of access. 141 Nev., Adv. Op. 4, 562 P.3d  
15 1071, 1077 (2025).

16 "The public's right of access extends beyond simply the ability to  
17 attend open court proceedings" and encompasses "a pervasive common  
18 law right to inspect and copy ... judicial records and documents." *Id.* citing  
19 *In re Cendant Corp.*, 260 F.3d 183, 192 (3d Cir. 2001) (internal quotation  
20 marks omitted); see also *Grae v. Corr. Corp. of Am.*, 134 F.4th 927, 931-33  
21 (6th Cir. 2025) (applying the common law right of access where a press  
22 entity sought access to sealed documents two years after the parties  
23 entered a class-action settlement resolving the case).

24 Even if this Court came to the conclusion that certain interpretations  
25 of law could allow banning press access to hearings and electronic court  
26 indices to be hidden from the press, this Court must adopt the  
27 interpretation that is constitutional. This is because "when the language of  
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1 a statute admits of two constructions, one of which would render it  
2 constitutional and valid and the other unconstitutional and void, that  
3 construction should be adopted which will save the statute.” *State v.*  
4 *Castaneda*, 126 Nev. 478, 481, 245 P.3d 550, 553 (2010). In other words,  
5 before the Court are two (2) possibilities:  
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7  
8 a) NRS 128.090(7)(b) does not allow the discretion necessary to  
9 conduct the strict scrutiny analysis, empowering this Court to declare it  
10 unconstitutional and void, consistent with the *Falconi* Court’s holding; or,  
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12 b) NRS 128.090(7)(b) does allow the Court the discretion necessary to  
13 conduct the strict scrutiny analysis, in which case this Court should  
14 proceed.  
15

16 One way or another, this Court is empowered to conduct the strict  
17 scrutiny analysis, and must exercise its discretion to do so as required by  
18 the First Amendment. ONJ urges this Court to unseal the entire case file;  
19 except to the extent “the presumption of a First Amendment right of access  
20 can be overcome [or otherwise] preserve [an identified] compelling interest  
21 [by] narrowly tailor[ing any restriction] to serve that interest.” *Falconi*, 543  
22 *P.3d* at 97.  
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26 "It is not unrealistic even in this day to believe that public inclusion  
27 affords citizens a form of legal education and hopefully promotes  
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**EXHIBIT 1**

**EXHIBIT 1**

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

PLAINTIFF
-VS-
BRADLEY BELLISARIO
DEFENDANT

CASE NO: D-25-R
DEPT. NO: A

MEDIA REQUEST AND ORDER ALLOWING CAMERA ACCESS TO COURT PROCEEDINGS

Please efile and email DC (dept. number)Inbox@clarkcountycourts.us and cc pricem@clarkcountycourts.us to ensure that the request will be processed as quickly as possible.

Alex Falconi (name), of Our Nevada Judges, Inc. (media organization),

hereby requests permission to broadcast, record, photograph or televise proceedings in the above-entitled case in Dept. No. A, the Honorable Judge Mari Parlade Presiding, on the 21 day of January, 2027.

I hereby certify that I am familiar with, and will comply with Supreme Court Rules 229-246, inclusive. If this request is being submitted less than twenty-four (24) hours before the above-described proceedings commence, the following facts provide good cause for the Court to grant the request on such short notice:

N/A

It is further understood that any media camera pooling arrangements shall be the sole responsibility of the media and must be arranged prior to coverage, without asking for the Court to mediate disputes.

Dated this 7 day of May, 2026.

SIGNATURE: [Signature] PHONE: 702-374-3530

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IT IS HEREBY ORDERED THAT:

- The media request is denied because it was submitted less than 24 hours before the scheduled proceeding was to commence, and no "good cause" has been shown to justify granting the request on shorter notice.
The media request is denied for the following reasons:
The media request is granted. The requested media access remains in effect for each and every hearing in the above-entitled case, at the discretion of the Court, and unless otherwise notified. This order is made in accordance with Supreme Court Rules 229-246, inclusive, at the discretion of the judge, and is subject to reconsideration upon motion of any party to the action. Media access may be revoked if it is shown that access is distracting the participants, impairing the dignity of the Court, or otherwise materially interfering with the administration of justice.
OTHER:

IT IS FURTHER ORDERED that this document shall be made a part of the record of the proceedings in this case.

Dated this day of, 20.

DISTRICT COURT JUDGE