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DISTRICT COURT
CLARK COUNTY, NEVADA
FAMILY DIVISION

[redacted] Plaintiff, vs. DOUGLAS ANSELL; Defendant. _____/	CASE NO: D-15-[redacted]-D DEPT NO: SENIOR JUDGE **REPLY TO OPPOSITION TO MOTION TO UNSEAL CASE**

COMES NOW, Our Nevada Judges, Inc., a Nevada non-profit corporation, by and through the undersigned counsel, and hereby files its reply to the Oppositions to Motion to Seal filed on November 6 and 7, 2026 by Defendant, Technoir, LLC, Inenvi, Inc., and Incorp Services, Inc. This reply is based upon the following memorandum of points and authorities and all exhibits attached hereto.

DATED this Nov 9, 2026

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MEMORANDUM OF POINTS AND AUTHORITIES

Our Nevada Judges, Inc. ('ONJ') is providing news coverage of these proceedings, not advocating for one side or the other. ONJ takes no position on the outcome of any issue before the Court, with the sole exception of those issues related to press and camera access to this courtroom and records of these proceedings.

ONJ's purpose is consistent with the Supreme Court's educational[1] and informational[2] mandate. SCR 241(1). ONJ is not involved to coerce settlement; publication of the proceedings will follow the standard serial[3] and clustered[4] coverage models. Parties' settlement, if any they reach, will have no impact on publication and coverage will continue regardless of whether Parties settle the matter.

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[1] Our Nevada Judges, Inc., *In the Matter of the Discipline of Michele Fiore*, YouTube (Oct. 21, 2026), https://www.youtube.com/watch?v=xpNjataKPzc. In this video, graphics are edited into the video to identify the participants, educate on legal terms, and organize the phases of the proceeding. Executive Director Paul Deyhle granted ONJ's request for camera access and designated Alexander Falconi as the media coordinator. Mr. Falconi collaborated with the Las Vegas Review-Journal and 8 News Now in providing electronic coverage for the benefit of the public, bench, and bar.

[2] Katelyn Newberg, *Here's What Error Rates Can Say About a Judge's Performance*, Las Vegas Review-Journal (Dec. 7, 2025), https://www.reviewjournal.com/news/politics-and-government/heres-what-error-rates-can-say-about-a-judges-performance-3592000. In this article, ONJ's partnership with the newspaper is discussed, which specifically incorporates ONJ's statistical analysis of appellate dispositions.

[3] ONJ's "serial coverage" model mandates ongoing coverage of a case. This means that once ONJ starts coverage of a case, coverage of that case will continue, indefinitely.

[4] ONJ's "clustered coverage" model emphasizes coverage of connected cases. This means that once ONJ starts coverage of a case, coverage of connected cases will usually occur.

Parties' disputes over alleged confidentiality breaches apparently pending before this Court in the context of contempt proceedings are of no concern to ONJ, except that ONJ intends to provide coverage of them same as it intends to provide coverage of all other issues in this matter. Defendant's allegations of attorney misconduct by Marshal Willick do more to undermine his position given the Supreme Court has expressly held that the conduct of lawyers is a matter of public interest. *Abrams v. Sanson*, 136 Nev. 83, 87, 458 P.3d 1062, 1067 (2020). Likewise, Mr. Willick's allegations of impropriety by former Justice Nancy Saitta, which were taken seriously[5] by the Commission on Judicial Discipline, support press access because "[t]he operations of the courts and the judicial conduct of judges are matters of utmost public concern." *Del Papa v. Steffen*, 112 Nev. 369, 374, 915 P.2d 245, 249 (1996). In other words, Parties' grievances as to how these proceedings are being conducted, weigh in favor of press access, not against.

Defendant's reliance on alleged misconduct[6] by Plaintiff and her counsel are especially unavailing because to bar press access to

[5] On August 1, 2022, the Commission on Judicial Discipline publicly reprimanded Senior Justice Nancy Saitta for her role in mishandling these proceedings. To the extent Defendant asserts a distinction between reprimand and suspension, Justice Saitta later faced a second round of misconduct charges for her incompetence in an unrelated case, and ultimately consented to removal from the bench on December 20, 2023.

[6] For example, Defendant refers to publication of a Sunrise Hospital record, allegedly by Mr. Willick; ONJ does not know what this is and did not publish it. It appears to be an incident that occurred prior to ONJ's involvement and it would not be appropriate to punish the press for the alleged misconduct of a lawyer.

proceedings based upon the misconduct of lawyers and parties would encourage such misconduct by participants intending to manipulate and interfere with press coverage of proceedings; it is the duty of the Court, not the press, to supervise counsel and parties subject to its jurisdiction.

Defendant's perception as to one-sidedness of media coverage is especially spurious given ONJ directly opposed Mr. Willick in a hard fought case, with the support of the American Civil Liberties Union of Nevada, the Las Vegas Review Journal, and the Legal Aid Coalition[7], before the Supreme Court and later the Legislature regarding S.B. 432, publications of which were published to ONJ and remain published to ONJ. ONJ is a non-profit corporation tasked with bridging the gap between the public and the judiciary; Defendant's perception that ONJ is involved to manipulate settlement negotiations couldn't be further from the truth - and there is no evidence supporting such a claim. ONJ and this Court are both tasked with serving the public, they merely do so in different ways. "The free press is the guardian of the public interest, and the independent judiciary is the guardian of the free press." *Leigh v. Salazar*, 668 F.3d 1126 (9th Cir. 2012).

1. Existing Confidentiality Orders Are Irrelevant

ONJ sympathizes with Defendant that its involvement may undermine existing protective orders and confidentiality agreements, but to bind the press to parties' litigated dispositions on these issues would

[7] The Legal Aid Center of Southern Nevada, Northern Nevada Legal Aid (f.k.a. Washoe Legal Services), Nevada Legal Services, and Volunteer Attorneys for Rural Nevada united to file an amicus brief in support of ONJ's efforts. Exhibit 4.

violate the First Amendment because the interests of the press are often inconsistent[8] with the interests of litigants. SRCR 3(4) ("The parties' agreement alone does not constitute a sufficient basis for the court to seal or redact court records.") *Falconi v. Eighth Jud. Dist. Ct.*, 140 Nev., Advance Op. 8 (2024) (striking down NRS 125.080 because it mandated closure of the court on mere demand of a party.) ONJ is not bound by Parties' confidentiality agreements and protective orders, and is entitled to access to the courtroom and these records as statutory, common, and constitutional law provide. *NY Times Co. v. Dist. Ct.*(Doe 1 trust), 141 Nev. Adv. Op. 71 (Dec. 23, 2025)

2. The Problem of Categorical Sealing and Redaction

Defendant expresses outrage at ONJ requesting the entire case file unsealed. But ONJ is not interested in publication of the entire contents of the case file. ONJ simply does not know what it does not know, because sealed filings are inaccessible. ONJ cannot possibly determine what in the files is confidential and what is not without the assistance of the Court. The Supreme Court recognized this paradoxical problem by imposing a duty on judges to "*sua sponte* consider possible alternatives to [the] closure even when they are not offered by the parties." *Nester v. Dist. Court*, 141 Nev. Adv. Op. 4 (Jan. 30, 2025). See also SRCR 4(2).

ONJ is not seeking access to "restricted personal information" as outlined in SRCR 2(6). ONJ has no interest in the photographs of the

[8] Though parties and the press generally share an interest in seeing justice done, parties are largely focused on winning their cases. ONJ is disinterested in the outcome, and is instead focused on publishing it, along with the operation of the court.

minor child. ONJ has no interest in trade secrets, but may consider challenging what Defendant and this Court have classified as trade secrets, especially if Defendant uses trade secrets as a basis to bar access to J.A.V.S. videos. NRS 600A.030. See also *MEI-GSR Holdings, Ltd. Liab. Co. v. Peppermill Casinos, Inc.,* 134 Nev. 235, 238, 416 P.3d 249, 254 (2018) (discussing the definition of a trade secret.) See also *Frantz v. Johnson*, 999 P.2d 351, 358 n.4 (Nev. 2000) ("whether corporate information, such as customer and pricing information, is a trade secret is a question for the finder of fact.") Likewise, ONJ has no interest in financial disclosure forms, psychological reports, medical records, and educational records *generally*, but the context upon which they are relied upon may become a point of contention.

Defendant's reliance on this Court's existing sealing and confidentiality orders is unavailing, because these orders are based upon an unconstitutional statute and pre-date the publication of the *Falconi* decision. Likewise, Defendant cannot expect ONJ to institute writ proceedings on those orders because it would lack standing and would not be ripe for appellate review given this Court has not yet had the opportunity to conduct the *Falconi* analysis.

Defendant urges either sealing the entire case file, which would violate SRCR 3(5)(c); leaving the existing sealing orders undisturbed, which contravene the opinion of the *NY Times Court*; or, engage in a categorical sealing consistent with NRS 121.110. But NRS 121.110 does not actually require a categorical sealing; even if it did, a statute or rule

providing for the automatic sealing of records by a court clerk without "further order of a judge [is] unconstitutionally overbroad." *Civil Beat Law Ctr. for the Pub. Int., Inc. v. Maile*, 113 F.4th 1168, 1180 (9th Cir. 2024). The Legislature cannot solve the problem of passing unconstitutional statutes by passing new unconstitutional statutes. If the Rupert Murdoch News Corp Trust parties were not able to distinguish their proceedings from *Falconi* neither should Mr. Ansell. The Legislature's intent is only relevant when that intent does not violate the constitution; and, this is not merely a family court principle. *Powers v. Eighth Jud. Dist. Ct.*, 142 Nev. Advance Opinion 35 (2026) (describing the Legislature's repeated violations of the separation of powers clause in enacting statute after statute interfering with the judiciary's constitutional authority to promulgate rules.) This is because the Constitution of the United States is the supreme law of the land. U.S. Const. art. VI, § 2. The *Falconi Court* and *NY Times Court* require a strict scrutiny analysis on courtroom and records access. NRS 121.110(1)(b) and NRS 121.110(4)(c)'s "good cause" language either allow for this Court to conduct that analysis, or are unconstitutional for interfering with the Court's constitutional mandate to exercise that discretion. *State v. Castaneda*, 126 Nev. 478, 481, 245 P.3d 550, 553 (2010).

For these several reasons, Defendant's request for a categorical approach is constitutionally untenable. ONJ proposed allowing financial disclosure forms, custody evaluations, medical records, educational records, and trade secrets to remain categorically sealed *temporarily* as ONJ does not have an interest in these records *yet*. But such a

concession would need to be *without prejudice*, because there may be unusual circumstances in which one of these records is necessary for the public to understand how this Court disposed of an issue. Also problematic is the inevitability that often occurs with categorical sealing in which parties take advantage of a categorical seal to justify blocking public access to the courtroom, a transcript, or J.A.V.S. video. If, for example, ONJ wants access to a J.A.V.S. video, and Defendant objects, arguing specifically that the J.A.V.S. should remain sealed because it contains discussion of a financial disclosure form, ONJ would insist on a strict scrutiny analysis despite it being a category NRS 121.110(1)(b) item. Ultimately, this Court must find a compelling interest to preclude public access to any record, even a record listed under NRS 121.110(1)(b), and even if it does find one, the Court is required to narrowly tailor any public access restriction to serve that compelling interest.

3. Regarding Service of Process and Intervention

Plaintiff was properly served. Exhibit 1. Defendant's argument that briefing should continue with additional delay is meritless as the omission of a party from proof of service clearly has no effect on the validity of service of process. NRCP 5(b)(4).

Technoir, LLC, Incorp Services, Inc., and Inenvi, Inc. (hereinafter 'the Companies'), are non-parties, and were not entitled to service by ONJ. In a *Minute Order* entered October 14, 2026, this Court ordered opposition briefs filed by November 6, but the Companies filed their

briefs on November 7; this Court has the discretion to consider them untimely and should disregard them as such, especially considering Defendant has adequately argued their interests in his own opposition brief.

The Companies argue ONJ must intervene, which tangles their efforts to intervene into ONJ's reply. ONJ, in disagreeing it must intervene, necessarily argues against the Companies' purported need to intervene. NRS 12.130 bars post-judgment intervention on the merits, and on June 20, 2019 this Court denied Haojia's motion to intervene because Defendant adequately represented its interests, which implicates issue preclusion. "The general rule of issue preclusion is that if an issue of fact or law was actually litigated and determined by a valid and final judgment, the determination is conclusive in a subsequent action between the parties…" *University of Nevada v. Tarkanian*, 110 Nev. 581, 599, 879 P.2d 1180, 1191 (1994). Indeed, the Companies having learned of this motion practice from Defendant further supports they are in privity and justifies this Court's refusal to allow intervention. Likewise, ONJ is not interested nor would it be necessary for it to obtain party status from this Court. SRCR 4(2). ONJ's participation as a non-party news reporter is consistent with its efforts to remain excluded from Parties' marital dispute and focused solely on obtaining access to the courtroom and these records in furtherance of its news reporting objective.

ONJ has aggressively litigated the issue of unsealing and its

opponents, as Defendant does now, typically argue that SRCR 1(4) must be interpreted to wholly exclude the delineated domestic relations matters from the SRCR entirely. This interpretation is especially untenable in this specific context because when read harmoniously with NRS 12.130 non-parties are rendered utterly unable to participate in post-judgment unsealing efforts. Also problematic with this interpretation is that SRCR 7 would no longer trigger, causing confusion as to how appellate case files would be sealed.

"[R]ules of statutory construction apply to court rules." *Weddell v. Stewart*, 127 Nev. 645, 650, 261 P.3d 1080, 1084 (2011). ONJ urges a construction of SRCR 1(4) that requires deference to statutory language only where that statutory language expressly contradicts a provision of the SRCR. ONJ's construction would thus allow the SRCR to apply generally, with NRS 121.110 controlling only where its language expressly contradicts the SRCR. This is consistent with how the Supreme Court continues to this day to apply SRCR 7 to appeals arising from paternity actions and termination of parental rights, despite their delineation in SRCR 1(4). This is also consistent with the Supreme Court's invocation of SRCR 3 in *NY Times Co. v. Dist. Ct.(Doe 1 trust)*, *Id*. despite the Rupert Murdoch News Corp Trust parties' vigorously arguing that SRCR 1(4) excludes trust proceedings from the SRCR entirely.

The theoretical exclusion of any civil proceeding from the SRCR does not mean that judges can seal and redact records as it strikes their

fancy. “A court's authority to limit or preclude public access to judicial records and documents stems from three sources: constitutional law, statutory law, and common law.” *Howard v. State,* 128 Nev. 736, 740, 291 P.3d 137, 140 (2012). Accordingly, whether the SRCR apply or not, a non-party needs an avenue with which to bring the issue of unsealing to the attention of the Court. NRS 121.110(4)(c) does not expressly prohibit a non-party from filing a motion to unseal. But NRS 12.130 does forbid intervention post-judgment. Under these circumstances, this Court should adopt the construction that allows ONJ to proceed under SRCR 4(2) as the most reasonable construction. Such a construction would also obviate this Court’s need to allow the Companies to intervene, as the Companies, like ONJ, would be able to participate in the motion practice pursuant to SRCR 4(2). Such a ruling would be consistent with this Court’s prior rulings disallowing intervention, would better conserve judicial resources, and would allow Plaintiff and Defendant to litigate their divorce without unnecessary intervention by business entities. This construction would also effectively thwart[9] Defendant’s concerns as to the timeline in which ONJ chose to file the instant motion to unseal. SRCR 4(4).

4. Regarding Ongoing Publication of Proceedings

What ONJ has brought before this Court are issues of physical,

[9] Even if SRCR 4(4) did not apply, the Supreme Court has repeatedly stated that where no statute or rule implicates a time limit, *Laches* controls. *Buckholt v. Second Judicial District Court*, 94 Nev. 631, 584 P.2d 672 (1978)(overruled on other grounds by *Pan v. Eighth Judicial Dist. Court*, 120 Nev. 222, 88 P.3d 840 (2004))

camera, and records access. Defendant expresses outrage at ONJ's ongoing publication of these proceedings apparently due to the existence of what appear to be gag orders prohibiting publication to, *inter alia*, "social media". This Court's entry of such orders constitute prior restraints on free speech. *Neb. Press Ass'n v. Stuart*, 427 U.S. 539, 559, 96 S.Ct. 2791, 49 L.Ed.2d 683 (1976). "[P]rior restraints on speech and publication are the most serious and the least tolerable infringement on First Amendment rights" and are presumptively unconstitutional. *Org. for a Better Austin v. Keefe*, 402 U.S. 415, 419, 91 S.Ct. 1575, 29 L.Ed.2d 1 (1971). ONJ does not need to wait for this Court's approval nor is Defendant or this Court's consent necessary to publicize these proceedings. "[P]rior restraints on speech and publication are the most serious and the least tolerable infringement on First Amendment rights," *Las Vegas Review-Journal v. Eighth Jud. Dist. Ct.*, 134 Nev. 40, 43, 412 P.3d 23, 26 (2018) citing *Neb. Press Ass'n v. Stuart*, 427 U.S. 539, 559, 96 S.Ct. 2791, 49 L.Ed.2d 683 (1976). Indeed, efforts by District Court Judge Jessica Peterson to eject a news reporter from her courtroom for not abiding by her order to refrain from publishing a victim's identity, notwithstanding her good intentions, triggered the immediate, extraordinary, and emergency intervention of the Supreme Court. *Las Vegas Review-Journal v. Eighth Jud. Dist. Ct.*, 142 Nev. Adv. Op. 31, 587 P. 3d 818 (2026). While press access issues also implicate First Amendment concerns, the imposition of a gag order is especially sensitive to appellate review, because prior restraints are so repugnant

to the Constitution that they invoke "a heavy presumption of unconstitutionality[.]" *Talk of the Town Bookstore v. City of Las Vegas*, 92 Nev. 466, 470, 553 P.2d 959, 961 (1976). Defendant and the Companies appear aware of the perils of doing so, as they expressly state in their oppositions that they are not requesting a prior restraint directed at ONJ.

This Court has the discretion to limit access, not publication. Accordingly, the exercise of discretion should be seen not through the lens of media coverage generally, but rather, the *accuracy* of media coverage specifically. Defendant's ancillary civil cases have already to a large degree publicly exposed this divorce. A well-intentioned curtailing of press access to these proceedings would have the same effect as an arbitrary or capricious curtailing of press access; namely, weakening accuracy of coverage. Any such exercise of discretion by this Court should bear in mind the degree to which these proceedings are already publicly exposed. Compare *Las Vegas Review-Journal v. Eighth Jud. Dist. Ct., Id.*

ONJ sympathizes with Defendant's frustration at published guardianship proceedings, but ONJ routinely publicizes these types of proceedings. The public has an interest in how the Family Division handles domestic relations matters. This is because "[p]eople in an open society do not demand infallibility from their institutions, but it is difficult for them to accept what they are prohibited from observing." *Richmond Newspapers v. Virginia*, 448 U.S. 555, 556-57 (1980). "We acknowledge that there is an interest in protecting litigants' privacy rights in family law

proceedings, as those proceedings apply wholly to their private lives." *Falconi*, *Id* at P.3d 99. citing *In re Marriage of Burkle*, 135 Cal. App.4th 1045, 37 Cal. Rptr. 3d 805, 807-18 (2006).

5. Regarding Camera Access Generally

Camera access, unlike physical court access and access to records, has been determined to have no First Amendment roots. Instead, ONJ enjoys this right due to the wisdom of our Supreme Court, which has conferred the privilege upon SCR 229(1)(c) news reporters by its promulgation of SCR 230(1). A presumption of access is triggered if the hearing in which ONJ requests camera access to would be open to the public, and the Court may only restrict[10] camera access if particularized findings justifying the restriction are made consistent with SCR 230(2). Indeed, efforts to arbitrarily or capriciously block camera access to Nevada's courtrooms have repeatedly failed. *Solid v. Eighth Judicial District Court*, 133 Nev. 118, 393 P. 3d 666 (2017). *Our Nev. Judges, Inc. v. Second Judicial Dist. Court,* 553 P.3d 445, 2024 WL 3841691 (Nev. 2024) (unpublished disposition). Exhibit 2. *Our Nevada Judges, Inc., vs Boulder City Justice Court*, Eighth Jud. Dist. Ct., case no. A-26-946122-W, May 12, 2026. Exhibit 3.

The consent of participants is not required. SCR 240(1). Because camera access is not a First Amendment right, it would be appropriate for the Court to impose restrictions on publication of footage obtained by news reporters in the context of audio and video footage recorded by

[10] SCR 243 expressly provides a news reporter with the right to seek appellate review by writ petition.

a high-definition camera placed in the courtroom. ONJ accounts for these common sense restrictions by its internal operating procedures and policies requiring redaction of children. ONJ does not oppose redacting the child's name, image, or date of birth from recorded footage. ONJ does not oppose redacting the child's sensitive medical details; but, redaction of ordinary medical and educational issues not otherwise embarrassing to the child that may be useful in assisting the public in understanding disposition of child custody issues consistent with the Supreme Court's SCR 241(1) mandate and should not require redaction.

ONJ's policies also, generally, provide for redaction of parents in domestic relations matters; however, Defendant has been deemed to fit within the "futility exception", and as such his identity is not being redacted because his identity, including face and voice, have already been exposed in the myriad civil proceedings sprouting from this divorce. ONJ will comply with this Court's orders restricting publication of footage recorded to high-definition cameras deployed to the courtroom, but urges the Court to exercise its sound discretion as the viewers have an expectation that such restrictions are reasonable, and do not attempt to hide what the public already knows. Arbitrary restrictions to camera access reflect poorly on both the professionalism of the press and the competence of the judiciary: "[S]ecret judicial proceedings pose [a threat] to public confidence in this court and the judiciary" because "secrecy encourages misunderstanding, distrust, and

disrespect for the courts." *Del Papa v. Steffen*, 112 Nev. 369, 374, 915 P.2d 245, 249 (1996).

Defendant appears to express frustration at publication inconsistent with ONJ policy, e.g. transposition of text or a missed redaction; if this occurs, Defendant is encouraged to reach out to ONJ with the issue which if discovered, ONJ will promptly correct. The Court need not typically be disturbed as ONJ would prefer publication be as high-quality as possible and would of course correct errors speedily, as necessary and appropriate.

6. Conclusion

Defendant pretends a visceral resistance to press coverage of his divorce, while bloating his brief with a plethora of irrelevant facts, inane allegations of media bias, and meritless legal arguments. He is not entitled to litigate this matter in his own personal Star Chamber; the parties are seeking justice from a public institution subject to public scrutiny. Furthermore, ONJ is not the only institution undertaking this effort to foster transparency in Nevada's courts. The Legal Aid Center of Southern Nevada emphatically supported ONJ's efforts to strike down NRS 125.080, citing the suffering of "economically disadvantaged parties and the unfairness of private trials and hearings" and denouncing "private or closed hearings and trials [for] exacerbat[ing] unfairness to *pro se* litigants because [closure] allows [a] clubby system to exist behind closed doors." Exhibit 4.

ONJ is also supporting the Child Attorney Project's efforts to strike

down NRS 126.211, which unconstitutionally interferes with press access to paternity cases. Exhibit 5. Exhibit 6. Indeed, even Clark County Family Services is backing these efforts. Exhibit 7. Suffice it to say, the notion that all press coverage is harmful to children is no longer tenable given the aggressive efforts of multiple public institutions to dismantle anti-public access statutes and rules. While it may be questionable in some cases that press scrutiny of domestic relations matters is not in the best interests of the children of a particular case, it is unquestionable that press scrutiny of the operation of the family system is in the best interests of the children of our society at large.

For these several reasons, ONJ hereby requests that this Court:

a) Unseal all pleadings, motions, oppositions, replies, orders, minute orders, notices, transcripts, and J.A.V.S. videos; and,

b) Allow physical access to the courtroom, subject to reconsideration only upon the filing of a motion; and,

c) Allow ONJ camera access and electronic coverage rights to the courtroom, subject to reconsideration upon request; and,

d) Order sealed financial disclosure forms, psychological reports, educational reports, and child custody evaluations, without prejudice; and,

e) For such further relief as the Court deems necessary and just.

DATED this Nov 9, 2026

By: /s/Luke Busby
LUKE A. BUSBY, ESQ.
Nevada Bar No. 10319
Attorney for Our Nevada Judges, Inc.

CERTIFICATE OF SERVICE

I certify that on the date shown below, I caused service to be completed of a true and correct copy of the foregoing document by:

_____ personally delivering;

_____ delivery via Reno/Carson Messenger Service;

_____ sending via Federal Express (or other overnight delivery service);

_____ depositing for mailing in the U.S. mail, with sufficient postage affixed thereto; or,

__x___ delivery via electronic means (fax, eflex, NEF, etc.) to:

Marshal Willick, Esq.	Irina Ansell
John Jones, Esq.	Mathew S. McLaughlin, Esq.
Joseph Ganley, Esq.	David Doto, Esq.

DATED this Nov 9, 2026

By: /s/ Luke Busby

List of Exhibits

Exhibit 1: Electronic Service Return
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Exhibit 2: Order Granting Petition for Writ of Mandamus, Supreme Court, Case No. 88483
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Exhibit 3: Alternative Writ of Mandamus and Order to Show Cause, Eighth Jud. Dist. Ct., Case No. A-26-946122-W
Pages: 5

Exhibit 4: Brief of Amici Curiae Legal Aid Center of Southern Nevada, Nevada Legal Services, Northern Nevada Legal Aid and Volunteer Attorneys for Rural Nevadans, Case No. 88483
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Exhibit 5: Petition for Writ of Mandamus, Supreme Court, Case No. 91212
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Exhibit 6: Amicus Brief of Amicus Curiae, Supreme Court, Case No. 91212
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Exhibit 7: Answer In Support of Petition for Writ of Mandamus, Case No. 91212
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