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DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

[redacted] Plaintiff vs. DOUGLAS ANSELL, Defendant	CASE NO.: D-15-[redacted]-D DEPT. NO.: SENIOR JUDGE HEARING REQUESTED Hearing Date: to be set Hearing Time: to be set

DEFENDANT'S OPPOSITION TO OUR NEVADA JUDGES, INC.'S MOTION TO UNSEAL CASE FILE, FILED OCTOBER 12, 2026, AND REQUEST FOR HEARING

Defendant, Douglas Ansell, by and through his counsel, John D. Jones, Esq., of Jones & LoBello, opposes the Motion to Unseal Case File filed October 12, 2026 by non-party Our Nevada Judges, Inc. (the organization), and requests oral argument under EDCR 5.502(h) if the Court would find it useful. Defendant asks that the Court enter findings on the motion, and that his pending applications for an order to show cause, which are collateral to the sealing question and proceed whatever the Court

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decides on it, be set for evidentiary hearing on their own track. This Opposition rests on the papers and pleadings on file, the exhibits attached, the Declarations of John D. Jones and Douglas Ansell below, the memorandum of points and authorities that follows, and any argument the Court permits. It is filed by the date the Court's Minute Order of October 14, 2026 set.

I. INTRODUCTION

This Court has already said what is in the filings that Our Nevada Judges, Inc. asks it to publish. In the post-trial order it entered on November 3, 2021, the Court found that "from the onset of this case, Plaintiff has perpetrated a false narrative regarding nearly every aspect of the case"; that "Plaintiff's positions at trial and the claims made by her were not maintained with reasonable grounds and were intended to harass the Defendant who was the prevailing party"; and that the insistence of Plaintiff's counsel on a release of claims against himself and his firm as a condition of settlement "was improper and appears to be the primary reason that this case proceeded to trial rather than being settled well in advance of trial," the settlement offer so refused being, by the Court's own finding, "$1,300,000.00 to $1,500,000.00 (and likely more) higher than that which this Court awarded Plaintiff." (Exhibit 12 FFCL at 3-5).

In the Amended Decree, the Court found that confidential psychological reports "were improperly attached to the Pre-Trial Memo and should not have been in her possession according to local rule." (Exhibit 13 Amended Decree at 24). On

October 26, 2017 the Court ordered that any misrepresentation in the filings be sanctioned and that "[e]verything should be referenced with citation." (Exhibit 21.)

The Court of Appeals declined to consider arguments in Plaintiff's briefs because they rested on "counsel's own district court briefs, which in turn did not cite evidence in the record," and noted that the briefs "contain many assertions without supporting citations to the record." (Exhibit 12 Order of May 28, 2024, at 13-14 and n.10). And in the very decision the organization relies on, Falconi v. Eighth Judicial District Court, 140 Nev. 79, 543 P.3d 92 (2024), the Nevada Supreme Court cautioned Plaintiff's counsel, on the organization's own motion, "of the need to be accurate in representations made before this court. See, e.g., RPC 3.3(a)." Id., slip op. at 4 n.3. The organization's motion mentions none of this. Those findings are in the open record already; the sealed filings they describe are what the organization asks to publish, as written, with nothing on the page to say what this Court has found about them. There is no value in publishing to the world Plaintiff arguments that the Court rejected.

On October 12, 2026 at 2:58 p.m. the Court entered its Order Denying Media Request, denying the organization's request to record proceedings in this case "because the matter has been sealed since May 25, 2018 and amended August 13 2019" and stating that the Court "respectfully upholds the Amended Order filed August 13, 2019." (Exhibit 1 at 1.) At 4:14 p.m. the same day the organization filed the motion now before the Court, asking that "all pleadings, motions, oppositions,

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replies, and J.A.V.S. videos" in this case be unsealed. (Motion at 8.) The motion does not mention the order entered seventy-six minutes before it. It requests no hearing, identifies no document, addresses none of the factors NRS 121.110(5) requires the Court to consider, and offers, "[i]f no opposition is filed," to "defer" the statutory analysis altogether. (Motion at 5.) Defendant objects to any deferral; the Court should decide the statutory factors now, on this record, and deny the motion.

Defendant opposes the motion on five independent grounds, each sufficient on its own for the denial of the motion. First, the two applications for an order to show cause pending since 2022 concern how sealed records of this case were made public while the sealing orders were in force; Plaintiff's counsel's own verified Opposition of September 30, 2022 describes one such transmission.

The applications are collateral to the sealing question, rest on orders that were in force when the conduct occurred, and are neither reached nor stayed by anything the Court decides on this motion.

Second, NRS 121.110(4) gives a non-party no right of motion, and the Rules Governing Sealing and Redacting Court Records, on which the organization's one sentence of standing rests, do not apply to domestic relations matters.

Third, the motion was not served on the three non-party companies that obtained the May 25, 2018 order, nor on Plaintiff in proper person.

Fourth, on every factor the statute names the record supports maintaining the seal: the file holds financial disclosure forms, confidential exhibits, custody

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evaluations, three psychological reports, the medical and educational records and photographs of the parties' minor child, and the records of closed hearings; the filings the organization would publish are the ones this Court found were "intended to harass the Defendant"; and the organization's stated interest is its coverage product, which the categories the August 13, 2019 order recites already serve.

Fifth, the organization's own conduct while its motion was pending, including its publication of hearings from the civil action in which the parties' minor child is a party and from her guardianship matter, is the record on the one interest the statute deems compelling. This Court should be appalled.

The organization's motion rests on a history of this case that its own exhibit contradicts. The motion says the file was "unsealed" in 2017 and that the Clerk is withholding records because the seal is "in a state of flux." Motion at 3, 5. The written Order of Recusal of September 5, 2017 kept the parties' and experts' filings sealed, and the organization's own Exhibit 2 is the Clerk's statement that "[t]his case is sealed" and a release order is required, to which the organization answered that it "might or might not file a motion to unseal."

Nine months later, and seventy-six minutes after the Court declined its media request, it did. Defendant asks that the motion be denied, with findings; alternatively, that no ruling on unsealing issue until the pending applications are decided; and, in the further alternative, that nothing be opened except by category, on findings, after a hearing.

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The non-parties on whose motion the May 25, 2018 order was entered, InCorp Services, Inc., Inenvi, Inc. and Technoir, LLC, have appeared through counsel and filed their own opposition within the date the Court set. Non-Parties InCorp Services, Inc., Inenvi, Inc. and Technoir, LLC's Opposition to the Motion to Unseal Case File Filed by Our Nevada Judges, Inc. on October 12, 2026 (filed contemporaneously with this Opposition). Non-party Haojia, LLC has filed its own. Non-Party Haojia, LLC's Opposition to the Motion to Unseal Case File Filed by Our Nevada Judges, Inc. on October 12, 2026 (filed contemporaneously with this Opposition). Those oppositions set out the record on which the non-parties produced their records into this file and the harm an order opening those records would do to them. Defendant relies on that showing and does not repeat it. This Opposition addresses the statute, the interests of the parties and their minor child, the record the motion misstates, and the form of any order.

II. PROCEDURAL POSTURE

This case has been sealed since October 16, 2015. The parties' and experts' filings have been sealed continuously since that date, except for the six days of August 30 to September 5, 2017. By the written Order of Recusal filed September 5, 2017, hearing recordings and orders were open to inspection until the Order Regarding Motion to Seal of May 25, 2018 sealed the entire case. The Order Amending Sealing Order of August 13, 2019, entered on Plaintiff's own motion before Defendant's opposition was due, recited the categories of NRS 125.110(1)(b)

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then excepted and permitted production of discovery, as required, in the other actions; Defendant moved the same day to stay and reconsider it.

On October 8, 2019 the Court ruled that the amended order stands, made itself the in camera reviewer of any request for a document from this file, and ordered that Plaintiff's counsel must seek the Court's permission to release any information related to sealed matters. In practice, the amendment has permitted court-supervised production of discovery in other actions and nothing more; no filing of this case has been placed on any public index, and the Clerk told the organization in January 2026 that the case is sealed and a release order is required. The Court's order of October 12, 2026 upholds the amended order, and its Minute Order of October 19, 2026 states that the Court "can and will remain neutral and impartial in deciding the pending Motion to Unseal the Case." (Exhibits 2 through 11; Exhibit 1; Exhibit 17.)

The case is on limited remand from the Court of Appeals' Order of May 28, 2024 (No. 83916-COA). The Stipulation and Order entered June 11, 2026 stayed the post-remand briefing pending the parties' settlement conference and directed the parties to confer on a scheduling order. On September 30, 2026 Plaintiff's counsel filed a Lien for Attorney's Fees, a motion to adjudicate it and a motion for fees, and at 11:21 p.m. the same night the organization's Notice of Coverage Policies for Domestic Relations Matters was served through the Court's electronic service system on this sealed case from the organization's own e-mail address. (Exhibit 16.)

The Court denied the organization's SCR 230 media request of September 30,

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2026 on October 12, 2026 (Exhibit 1), and the organization filed the present motion the same afternoon. By Minute Order of October 14, 2026 the Court continued the case management conference set for October 15 "to allow for consideration of the Motion to Set Aside the Sealing Order," directed that "[a]ny motion in support of, or in opposition to, unsealing the case must be filed no later than November 6, 2026," and stated that it will decide by written order on the briefs. (Exhibit 17.) On October 14, 2026 Plaintiff's counsel filed a Case Management Conference Memorandum that lists, among the "interim orders needed," an order "[t]o unseal the case for the attendance of the media." (Exhibit 25 Memorandum at 3). This position by Plaintiff's counsel, without verification by Plaintiff, creates a serious concern for the Court given Plaintiff's stated desire that her file be and remain sealed.

The organization's motion was served, by its own certificate, on "Marshal Willick, Esq." and "John Jones, Esq." only, Motion at 11; neither Plaintiff in proper person nor the three non-parties on whose motion the May 25, 2018 order was entered were served. (Exhibit 6; Declaration of John D. Jones, paras. 3-4.)

III. THE RECORD

A. What the courts have found about the filings the organization asks to publish.

The organization asks the Court to open "all pleadings, motions, oppositions, replies, and J.A.V.S. videos." (Motion at 8.) This Court, the Court of Appeals and the Nevada Supreme Court have each said, in signed orders and published opinions,

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what those filings contain.

The record shows the following: the Court's findings of November 3, 2021 come first. Ruling on the post-trial motions after the financial trial, the Court found: "from the onset of this case, Plaintiff has perpetrated a false narrative regarding nearly every aspect of the case." (Exhibit 12 FFCL at 3). It found that "Plaintiff's positions at trial and the claims made by her were not maintained with reasonable grounds and were intended to harass the Defendant who was the prevailing party." Id. It found that the demand for a release of claims against Plaintiff's counsel and his firm, "proven by Plaintiff's counsel's email correspondence and the terms of Plaintiff's improperly filed Offer of Judgment," was "another example of Plaintiff and her counsel pursuing claims without reasonable grounds," that "Plaintiff's counsel and his law firm were not parties to this divorce case," and, further: "the insistence of a release of claims against Plaintiff's counsel and his firm was improper and appears to be the primary reason that this case proceeded to trial rather than being settled well in advance of trial." Id. at 3-4. None of these findings were disturbed on appeal. They are the law of this case.

The Court found that "in August of 2017, after an unsuccessful mediation, an exchange of emails occurred between counsel in which Defendant made additional offers to settle this case. The value of Defendant's offer was more than a million dollars greater than that which the Court awarded Plaintiff. The offer included consideration which is $1,300,000.00 to $1,500,000.00 (and likely more) higher than

that which this Court awarded Plaintiff. In his offer, Defendant even agreed to release Plaintiff from all claims he had against her." Id. at 5. The award was $972,471. Id. at 12. The e-mail correspondence the Court referred to is in the record: Plaintiff's counsel's associate answered the written offer of August 30, 2017 with the question "Does this include a waiver of all claims against XXXX or our firm?", and Plaintiff's counsel wrote that "the case either settles - ends - or does not. Half way is unacceptable." (Exhibit 22.) The Court further found that "regardless of the financial disparity between the parties, Plaintiff proceeded to trial in pursuant [sic] of untenable claims and ignored the multiple offers made by Defendant that would have provided her with significantly greater recovery/award than she achieved at trial," and, in the same order: "it was not necessary for Plaintiff to be represented by three lawyers and a paralegal at trial and many of the hearings in this case." FFCL at 6-7.

The Court of Appeals vacated the fee award that rested in part on those findings, because prevailing-party status "might change on remand," and left the findings themselves undisturbed. (Exhibit 12 Order of May 28, 2024, at 22). Those findings describe a case taken to trial past the client's own interest: untenable claims, an offer worth more than twice the eventual award refused, three lawyers and a paralegal, and a release of claims against counsel and his firm as the price of settlement. Defendant draws no further conclusion from them in this Opposition; the pending record makes it quite clear for the Court.

On May 9, 2018, and again in the Amended Decree of February 9, 2021, the

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Court found that "two confidential psychological reports" had been "improperly attached to the Pre-Trial Memo and should not have been in her possession according to local rule," and reserved for later determination a suggested "release by the Plaintiff to a third party" and internet postings "alleged to have been for no other purpose than to hurt Defendant." (Exhibit 13 Amended Decree at 24; Decision Tr., May 9, 2018, at 35-36). The reserved determinations have never been made.

On October 26, 2017, on Defendant's request that any misrepresentation in the filings be sanctioned, the Court ruled: "Mr. Jones' request to sanction any misrepresentation is so ORDERED ... A misrepresentation about what something says or some unnecessary, or a derogatory adjective modifying something will not be taken lightly. Everything should be referenced with citation." (Exhibit 21 Court Minutes of October 26, 2017; Order from October 26, 2017 Hearing, filed July 1, 2019, at 2). No filing has been corrected under that order. On March 23, 2018 the Court ruled that "allegations of leaking or proving information that is inappropriate, purposefully posting or providing information to others who could post otherwise sealed information is STRICTLY PROHIBITED," that the Court "will not hesitate to impose very serious Sanctions," and that "[a]llegations without support from either side, will be taken equally as serious." (Exhibit 21 Minutes, Mar. 23, 2018, at 3); the Court added from the bench: "The orders in this case are very clear." Id. (Tr. 40:20-41:1). On October 8, 2019 the Court said of the filings before it that reference "revenge lawsuits" have "no place in legal pleading," and ruled that Plaintiff's

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counsel "MUST SEEK PERMISSION of this Court, to RELEASE any INFORMATION related to matters that are SEALED, in THIS case." (Exhibit 8 Tr. 37:22-38:7; Minutes item 10). Of all parties and counsel in this case, the only one the Court directed to seek its permission before releasing sealed information was Plaintiff's counsel, not Plaintiff.

In 2016 the Court described the filings of that year as "a classic example of a case becoming the Willick/Jimmerson divorce action and now is devolving into the Willick/Jones divorce action." (Order from July 19, 2016 Hearing, filed Aug. 10, 2016, para. 24.) Defendant did everything he could to resolve the case and maintain civility for the benefit of the parties' minor child.

The organization relies on a newspaper article as its account of the events of August 2017. The written order states, at page 9, that "there was no testimony offered that indicates that Defendant is responsible for Mr. Sanson's behavior" and that the Court was "unable to attribute Mr. Sanson's actions to Defendant directly," and, at page 10, it states: "filings of the parties and experts contain sensitive information related to both custody issues and financial issues" and "those papers should remain sealed." (Exhibit 5 at 9-10.)

Deciding Plaintiff's appeal, the Court of Appeals declined to consider arguments that rested on "counsel's own district court briefs, which in turn did not cite evidence in the record," noted that Plaintiff's briefs "contain many assertions without supporting citations to the record," and declined to address as "wholly

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unsupported" the assertion that the Decree had been drafted by Defendant's counsel. (Exhibit 12 Order of May 28, 2024, at 12-14 and n.10, and at 23 n.14).

The Nevada Supreme Court. In Falconi v. Eighth Judicial District Court, 140 Nev. 79, 543 P.3d 92 (2024), the decision upon which the organization's motion relies, and in which the organization's founding director was the petitioner, the Supreme Court granted the organization's own motion concerning a representation Plaintiff's counsel had made as amicus and wrote: "We grant that motion and caution counsel of the need to be accurate in representations made before this court. See, e.g., RPC 3.3(a)." Id., slip op. at 4 n.3.

The organization's motion describes the related civil actions as the "blast radius" of its coverage and, in its footnotes, as actions in which Defendant "subjected Ms. Ansell to discovery" and "sued over the disclosure of medical records." Motion at 4 and nn.2, 6. The courts that heard those actions found otherwise. In A-18-777318-C, the action brought in the child's name through her guardian, the court concluded that there was no evidence "that anything in the underlying litigation was irregular or abusive," while observing that "[t]here is clearly animosity" between the parties. (Exhibit 19 Findings of Fact and Conclusions of Law, Apr. 11, 2023, Conclusion 9; Tr., Mar. 29, 2023, at 6-7). In Haojia LLC v. Willick, No. A-19-792105-B, the court found on September 23, 2026 that the claims were "litigated in good faith," in an order approved as to form by Plaintiff's counsel's own civil counsel. (Exhibit 18 Order, Sept. 23, 2026, Findings 22-23, at 5). In the same action,

the trial court declared a mistrial on August 25, 2023 after a juror reported contact; the court found that "[t]hat was juror misconduct. It was party misconduct," told Plaintiff's counsel, who was the defendant, "I took her account of it, frankly, Mr. Willick, better than yours," and stated, "I've sanctioned you personally." (Exhibit 20 Tr., Day 5, Aug. 25, 2023, at 90-91). Defendant states these matters only because the organization's motion puts the related cases before the Court as its reason for opening this one, and the record of those cases is not what the motion says it is. This should be nothing new to this Court.

B. The sealing orders and what each did.

The Order to Seal Records entered October 16, 2015 under NRS 125.110 sealed "all papers, records, proceedings and evidence, including exhibits and transcripts of testimony" and provided that they "shall not be opened to inspection except by the parties and their attorneys, or when required as evidence in another action or proceeding." (Exhibit 2 at 2.) The Order from the July 20, 2016 hearing, filed September 8, 2016, directed: "As a sealed file nothing should be shared with third parties. Nothing should be posted on social media." (Exhibit 4 Order at 7). The Confidentiality Order of September 23, 2016 provides that material designated confidential "shall be used solely for the prosecution or defense of the claims being litigated in this case and for no other purpose," and the Stipulated Confidentiality Agreement and Protective Order of May 13, 2016, signed by Plaintiff's counsel, placed the non-party companies' subpoena productions under the same restriction.

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(Exhibit 4.) The Order to Seal Records of November 23, 2016 restated the seal with the statutory wording. (Exhibit 3 at 2.)

The written Order of Recusal of September 5, 2017 states, at page 10, that "this Court concurs that the hearings in this matter and orders entered by the Court should not be sealed," but continues: "However, this Court recognizes that filings of the parties and experts contain sensitive information related to both custody issues and financial issues. Consistent with NRS 125.110, those papers should remain sealed." (Exhibit 5 at 10.) At page 11 it orders that "the hearing videos and orders entered by this Court should be unsealed." Id. at 11. Plaintiff's own motion of August 6, 2019 described that order as one "that unsealed the hearing videos and orders only." (Exhibit 7 Motion at 2).

On May 9, 2018, on the Ex Parte Motion to Seal of three non-parties, InCorp Services, Inc., Inenvi, Inc. and Technoir, LLC, heard on notice with Plaintiff's counsel present and not opposing, the Court ordered that "[o]ther than the Complaint and the Answer and Counterclaim, the entire case, including all docket entries, orders, pleadings, exhibits, videos and/or transcripts, is SEALED and will remain so until ordered otherwise by this court." (Exhibit 6 Order Regarding Motion to Seal, May 25, 2018, at 2; Notice of Entry, May 30, 2018). On August 6, 2019 Plaintiff moved to amend that order so that discovery could be produced, under protective orders, in the other actions then pending between the parties and their affiliates; on August 13, 2019 the Court entered the Order Amending Sealing Order, which

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provides: "1. The Order Regarding Motion to Seal filed on May 25, 2018, shall be amended to explicitly allow production of discovery as required in the other actions and proceedings. 2. The sealing order in this case shall not apply to the pleadings, the finding of the court, any order made on motion as provided in Nevada Rules of Civil Procedure, and the judgment." (Exhibit 7 Order at 2-3). That order did not open motions, oppositions, replies, exhibits, transcripts, recordings, expert reports or the custody and financial record, and the term "pleadings" was never defined. Defendant asked that it be defined as the Complaint, the Answer and Counterclaim and the Reply to Counterclaim and nothing else, the line the May 25, 2018 order itself draws. (See Reply to Opposition to Ex Parte Motion to Stay, filed Oct. 3, 2019, at 5.)

On October 8, 2019 the Court ruled that "[t]he AMENDED ORDER STANDS," made itself the in camera reviewer of any request for a document from the file, and entered the permission ruling quoted in Section III.A. (Exhibit 8 Minutes, Oct. 8, 2019, items 3, 4, 8, 10; Tr. 37:10-38:7, 50:24-51:2). The Court added, of the material in the file: "**we've got to make sure that we protect ... the minor child. Period." Id. (Tr. 51:12-15)**.

The Order from the January 16, 2020 hearing provides that "[a]ll documents shall be processed, presented, and filed in a way that protects the closed nature of these matters." (Exhibit 9 at 3.) On March 13, 2020, on Defendant's submission and with Plaintiff's counsel's approval as to form and content, the Court ordered that "the exhibits attached to Plaintiff's Pre-Trial Memorandum, filed on May 9, 2016 shall

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be STRICKEN from the record," and separately ordered that "anyone not bearing a Willick Law Group (@willicklawgroup.com) or Black & LoBello (@blacklobello.law) e-mail address shall be removed from the e-service list." (Exhibit 10; Black & LoBello is the undersigned firm under its former name.). On July 16, 2021 the parties stipulated, and the Court ordered, that four filings of the court-appointed neutral expert be "stricken, and thereafter left side filed so they remain confidential but part of the record of the case." (Exhibit 11 at 2.) On October 12, 2026 the Court denied the organization's media request and upheld the August 13, 2019 order. (Exhibit 1.)

No party has ever sought review of any of these orders. In the eight years since the May 25, 2018 order, no appeal and no writ petition has challenged any sealing order in this case; the only notice of appeal in this case is Plaintiff's of December 3, 2021, from the Decree. When Plaintiff's counsel did address the sealing orders before the Supreme Court, in his Motion to File Opening Brief and Appellant's Appendix Under Seal of October 13, 2022 (No. 83916), he wrote that "a number of them are directly contradictory" and that some were, in his view, contrary to Johanson, and then asked only to submit "the entire record under seal, until and unless this Court directs us to do otherwise." (Exhibit 31 Motion at 2.) Defendant joined on October 17, 2022. The Supreme Court was never asked to direct otherwise. On September 2, 2025, in A-19-792105-B, Plaintiff's counsel, through his own civil counsel, stipulated that "the papers and pleadings in the Divorce Action were sealed (see

October 16, 2015 Order to Seal Records; August 13, 2019 Order Amending Sealing Order)." Stipulation and Order Governing Exclusion of Non-Party History and Sealed Divorce Records, No. A-19-792105-B (Sept. 2, 2025), para. 3. The route for a non-party who believes a sealing order is unlawful is a writ, as the organization's founding director knows. Falconi, 140 Nev. 79, 543 P.3d 92 (slip op. at 5) ("direct appellate review is often not available to the press, and thus, writs for extraordinary relief may be necessary"). The organization, told by the Clerk on January 22, 2026 that a release order was required, filed nothing for nine months. (Motion, Exhibit 2.)

C. What the motion asks to open.

Whether any document in this file is a "pleading" within NRS 121.110(1)(a)(3) was left by the Court on October 8, 2019 to its own in camera review of any request, and Defendant's position of record on the term is stated in Section III.B. The organization asks for everything else, and everything else is what the statute closes by name. The file holds the parties' financial disclosure forms and tax returns (NRS 121.110(1)(b)(1)); the non-party companies' financial records and the forensic accounting, produced under two protective orders, which Defendant's counsel described to the Court in 2019 as "forensic accounting reports which contain confidential and proprietary information which, if released, could destroy Defendant's companies," (Exhibit 7 Ex Parte Motion to Stay, Aug. 13, 2019, at 3) (NRS 121.110(1)(b)(2), (4)); the child custody evaluations and three psychological evaluations (NRS 121.110(1)(b)(5), (6)); the medical, school and evaluation records

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of the parties' minor child; the attachments to Plaintiff's Pretrial Memorandum of May 9, 2016, struck from the record by the Court's order of March 13, 2020, which include twenty-three photographs of the child (among them photographs of a kind that should never have been filed, or created) and two psychological reports that this Court found "were improperly attached to the Pre-Trial Memo and should not have been in her possession according to local rule," (Exhibit 13 Amended Decree, Feb. 9, 2021, at 24); the court-appointed financial expert's filings left-side filed by stipulation in 2021; and the recordings and transcripts of every hearing in the case, including the custody evidentiary hearings of May 2016 and the hearings of March 23 and May 9, 2018, which were closed (NRS 121.100(8); NRS 121.110(1)(b)(7); EDCR 5.212(e)). The motion identifies none of this. It asks for all of it. Plaintiff's counsel, who obtained the August 13, 2019 order on his own motion, submitted the entire appellate record under seal in 2022 and wrote in June 2025 that cases sealed under prior law remain sealed, does not oppose this request. On the record set out in Sections IV.D and V, he is behind it.

D. The parties' minor child.

The parties have one minor child. The sealed filings hold medical records of the minor from 2015, allegations concerning her prenatal history and her care at age three, and photographs of her, filed by Plaintiff's counsel; her school records; the custody evaluations and psychological reports concerning her; and years of each parent's allegations about the other concerning her. The photographs were exhibits

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to Plaintiff's Pretrial Memorandum of May 9, 2016; the Court ruled from the bench on May 13, 2016 that the unadmitted exhibits were stricken (Hr'g Tr., May 13, 2016, Part 1, at 11:23-12:13) and struck them by the Stipulation and Order filed March 13, 2020, Exhibit 10, and the exhibits admitted at trial are not among them. The custody allegations of 2015 and 2016 ended in orders for joint legal custody and joint physical custody. (Stipulation and Order Resolving Parent Child Issues, filed December 5, 2016, at 1-2.)

The harm an order opening those filings would do falls on the child and on no one else. She is now old enough to read what is published about her, and what the organization would seek to publish is the filings about her, as written, with nothing on the page to say what this Court found about them. NRS 121.110(3) provides that "protecting personal identifying information concerning a party or child involved in the proceeding from disclosure shall be deemed to be a compelling interest that outweighs the public interest in access to the court record." NRS 121.110(1)(b)(5) and (6) close custody evaluations and psychological reports by name. The Court's Order re Social Media Posting of March 20, 2019 prohibited posting about the litigation, the other party or the child, on a finding concerning the child's best interest. Order re Social Media Posting (filed Mar. 29, 2019) at 2. On October 8, 2019 the Court said of the file: "we've got to make sure that we protect ... the minor child. Period." (Exhibit 8.)

The record on what the organization does with this child's matters is already

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made. Its sworn motion names, by case number, the guardianship matter concerning the child as a case the organization "has begun monitoring and reporting on," Motion at 3 and n.8, and its footnote 1 concerns matters outside this record. On October 16, 2026, four days after it filed the motion, the organization posted on its public channel two recordings of hearings in that guardianship matter, each titled as a hearing in the child's guardianship, and its own website lists both under the matter's case number. (Declaration of Douglas Ansell, para. 7.) Its Notice of Coverage Policies, served on this case September 30, 2026, states that "parents and children" are redacted in its coverage of domestic relations matters. (Exhibit 16.) One record of the child has been on a public docket before: the minor's Sunrise Hospital emergency-department discharge summary of October 28, 2015 was filed unredacted by the Willick Law Group as Exhibit 3 to its opposition of July 6, 2016 in the public business case A-14-703865-B, and it stayed public until that court's redaction order of February 21, 2019. A filing that the organization has announced it will publish thus already carries a sealed guardianship number and a footnote on subjects outside this case. Defendant asks that the motion itself be maintained in the sealed file; a motion is not a pleading under NRCP 7(a) or NRS 121.110(1)(a)(3). Part of the reason this case must remain sealed in its entirety is Plaintiff's counsel's willingness to file literally anything, even if the Rules prohibit it.

One further measure bears on the child's protection, and Defendant offers it on that ground alone. Plaintiff is an Assistant State Attorney in Florida, with the

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Office of the State Attorney for the Seventeenth Judicial Circuit (Florida Bar No. 1015600). (Exhibit 28.) Florida law exempts from public disclosure "the names, home addresses, telephone numbers, photographs, dates of birth, and places of employment of the spouses and children of current or former state attorneys, assistant state attorneys ... and the names and locations of schools and day care facilities attended by the children" of those prosecutors. Fla. Stat. 119.071(4)(d)2.f. The exemption binds Florida's agencies, not this Court, and Defendant does not suggest otherwise. He cites it because a record of this case published with one parent named is exactly the disclosure that measure exists to prevent as to this child, and because it marks the "substantial risk that a ... child involved in the proceeding may suffer" harm that NRS 121.110(5)(d) directs the Court to weigh, the same concern for personal identifying information that NRS 121.100(3)(c) states for the closure of a hearing and SCR 230(2)(c) states for its coverage.

E. The organization's publication of October 14, 2026.

On October 14, 2026, the day of the Court's Minute Order setting this briefing, the organization published on its public channel a recording it titled with Defendant's name and Plaintiff's counsel's name and dated January 29, 2019. (Declaration of Douglas Ansell, para. 4.) It is a hearing in the civil action A-18-777318-C, brought by Defendant individually and as guardian of the parties' minor child against Plaintiff's counsel, on Defendant's motion to dismiss a counterclaim pleaded against him individually and against the child through her guardian. The recording discusses

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the child's claims, the status of this divorce and its custody arrangement as of that date, and a then-pending petition for a guardian ad litem. The published clip opens on two passages taken from later in the hearing and placed before the call of the case, the first of them the presiding judge's characterization of the action. The organization's caption track is silent for seven seconds during the judge's statement of the parties to the counterclaim. The organization's description assigns the hearing the case number of an unrelated eviction appeal and calls Plaintiff's counsel "the defendant"; its own index files the video under the correct number. Id. Defendant states these facts because they are the record, in the movant's own hand on NRS 121.110(5)(c) and (d): the organization's interest reaches a case in which the child is a party; its stated policy is that children are redacted; and its product shows what that policy produces when a proceeding concerning the child is published. The hearing of January 29, 2019 was a public civil hearing; the point is what the organization does with a child's case, offered on the question whether this Court should open the custody file, the evaluations and the photographs to it. Defendant asks for no finding about purpose.

F. The dated facts of record concerning access to the file.

The record proves the following, each item from a filing or order of this Court:

1. On September 30, 2022, in his verified Opposition to Defendant's Renewed Motion for an Order to Show Cause, Plaintiff's counsel stated that "the REV transcription of the hearing was provided to Ms. Abrams as she and her firm were in

litigation against Mr. Sanson at the time," and that "this firm has every right in the world to hire anyone we want." (Exhibit 15 Opposition, Sept. 30, 2022, at 4-5). Ms. Abrams was not a party or counsel of record. The two applications for an order to show cause filed September 2, 2022 and October 25, 2022 concern that transmission and the orders then in force, and have never been set for hearing. 2. On September 2, 2025, in Haojia LLC v. Willick, No. A-19-792105-B, Plaintiff's counsel's own civil counsel stipulated that the papers of this case "were sealed (see October 16, 2015 Order to Seal Records; August 13, 2019 Order Amending Sealing Order)" and agreed to confer and to proceed under SRCR 3 before using any of them. Stipulation and Order Governing Exclusion of Non-Party History and Sealed Divorce Records, No. A-19-792105-B (Sept. 2, 2025), para. 3. On January 21, 2026 the organization asked the Clerk's video request unit for recordings of this case; the next morning the Clerk answered: "This case is sealed. As of today, I do not see your agency listed as a party on the case yet. Do you have a release order?"; the organization replied that it "might or might not file a motion to unseal." (Motion, Exhibit 2.) 3. On October 7 and 8, 2026 the organization published an article and a video about this case; the video reproduces, for about ninety seconds, the Court's own recording of the hearing of August 30, 2017, which has been sealed since May 25, 2018 and which the Clerk had declined to release to the organization in January. (Exhibit 24; Declaration of Douglas Ansell, paras. 3, 6.) The video's premise is stated in its own narration: interest in this case, it says, stems from Mr. Sanson's involvement in Defendant's

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divorce, "the recusal of District Court Judge Bryce Duckworth, the suspension of successor Senior Judge Nancy Saitta," and the recording of August 30, 2017 follows. (Declaration of Douglas Ansell, para. 3.) The written Order of Recusal says otherwise at page 9, as Section III.A sets out, and Senior Judge Saitta was not suspended: the one discipline of record is the Stipulation and Order of Consent to Public Reprimand filed August 1, 2022 with the Nevada Commission on Judicial Discipline, No. 2020-081-P, a public reprimand for delay in issuing the decree and the post-trial orders, which is not a suspension. This type of misrepresentation is why Movant's Motion must not be granted. 4. On October 10 and 11, 2026 the organization's founding director wrote to the Court's staff, outside any filing, that the seal is "unconstitutional," and Plaintiff's counsel replied to him, copying the Court's staff, offering to have his staff "dig out the relevant orders, transcripts, etc." and stating that "it could be argued that no such orders are now in effect [at] all." (Exhibit 23.) Eighteen months earlier the same director had told the Legislature that the discretion existed. Testifying against S.B. 432 on April 9, 2025, for the organization and two others, he said: "As the law stands today, the judiciary is capable of closing the courts and denying camera access," and gave as his best example a family-court case in which "[t]he judge specifically ordered that my cameras were the only ones allowed in the courtroom and that everyone else was prohibited from recording," a judge who "also closed the court for the portions of the testimony that she deemed appropriate." (Exhibit 30 Tr. at 17:05-17:56; Minutes at 65-67). That is access by

order, case by case, with the Court deciding what stays closed. It is the regime this Court is asked to keep, and the one the organization's director called "unconstitutional" on October 10. 5.

On October 12, 2026 the Court denied the media request; seventy-six minutes later the organization filed this motion. On October 14, 2026 the organization published Plaintiff's counsel's "no such orders are now in effect" statement over his name and announced that "publication of these proceedings will continue while the motion to unseal is briefed," with "over 280 J.A.V.S. videos in its possession." (Exhibit 26.) The same day Plaintiff's counsel filed the memorandum asking that the case be unsealed "for the attendance of the media." (Exhibit 25 Memorandum at 3). A request to lift an order concedes that it binds. Defendant states his understanding of that sequence in Section V, and sets it out here because NRS 121.110(5)(c) directs the Court to consider "[t]he interests of the party seeking to unseal the record," and the sequence is the record of what that interest is. No party or non-party has ever sought review of any sealing order in this case. Section III.B.

IV. ARGUMENT

A. The pending applications are collateral to the sealing question, proceed whatever the Court decides on this motion, and should be heard before any record is opened.

A court order "must be obeyed so long as it remains in effect." Truesdell v. State, 129 Nev. 194, 200, 304 P.3d 396 (2013). Defendant's applications of

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September 2 and October 25, 2022 ask the Court to determine whether records of this sealed file were transmitted to persons outside it while the Order to Seal Records of October 16, 2015, the Stipulated Confidentiality Agreement and Protective Order of May 13, 2016, the Order from the July 20, 2016 hearing ("nothing should be shared with third parties"), the Order to Seal Records of November 23, 2016 and the Order of Recusal of September 5, 2017 were in force. Ex Parte Application (Oct. 25, 2022) at 3-5; Renewed Motion (Sept. 2, 2022) at 3-5.

Plaintiff's counsel's own verified Opposition describes one such transmission (Exhibit 15), and Defendant's reply noted that the transmission was not denied and asked the Court to rule on every request Plaintiff's counsel did not deny or argue. (Reply Oct. 25, 2022 at 3, 8.) The applications have been pending for four years. Section V asks that the order to show cause issue on that admission and that the evidentiary hearing be set.

Two things follow, and they should be kept apart. The first is that the applications do not depend on this motion: they ask whether orders of this Court were obeyed while they were in force, by the persons they bound, on a record that closed in 2022, and nothing the Court later decides on the seal, or any reconsideration, writ or appeal from that ruling, changes the orders in force in 2017, the persons they bound, or what was done in violation of those orders.

Defendant asks that the Court say so in its order, so that no request for relief from its ruling on the seal is taken to stay them. This has been Defendant's position

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from the start: when the applications were filed, with the appeal from the Decree pending, his papers said that "issues of enforcement and contempt are always collateral to an appeal." (Renewed Motion Sept. 2, 2022 at 22-23 citing Mack-Manley v. Manley, 138 P.3d 525 (Nev. 2006); Reply Oct. 25, 2022 at 4.) Defendant's Motion to Strike of December 31, 2025 said, at 5 n.2, that the remand issues should be resolved before the applications were addressed. What has happened since, the communication of October 11, 2026 to the Court's staff, the motion now before the Court and the memorandum of October 14, 2026 asking that the file be opened for the media, is why Defendant now asks that they be set.

Defendant's position on the remand is unchanged: it is decided on the existing record, and his submissions on the applications "concern his 2022 applications and the Court's own records, not the remanded issues." (Opposition Oct. 22, 2026 at 29-30.) Again, the October 14, 2026 request by Plaintiff's counsel is contrary to Plaintiff's own stated desire that the file remain sealed.

The second is that the order of decision still matters for this motion. A later order opening the file would neither reach nor excuse a transmission made while it was sealed, but if the file is opened first, the applications will be heard against a record that is already public, and every question about how records of this file reached a publishing non-party will be answered with the words "no harm." If the applications are heard first, the Court decides whether to open the file with a record before it, made in open court, of how records of this case have left it, from whom,

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and under what representations about the Court's orders. The party whose counsel's conduct is the subject of the pending applications is the party now asking, in a memorandum filed the day the Court set this briefing, that the file be opened for the media. (Exhibit 25 Memorandum at 3). Defendant asks that the present motion be set for hearing under EDCR 5.502(h), that the applications be set for evidentiary hearing, that the Court consider the record of that hearing in deciding this motion, and that any order opening any record of this case be stayed until that hearing is held. Nothing in this request asks the Court to delay the briefing its Minute Order set; the briefs will be on file by November 6, 2026.

B. The organization has no motion under NRS 121.110, and the rules it cites do not apply to this case.

NRS 121.110(4) provides: "The court may unseal a court record sealed pursuant to subsection 3: (a) Upon written stipulation of all parties; (b) Upon its own motion for good cause shown; or (c) Upon the motion of a party for good cause shown. A copy of any such motion must be served upon all parties to the proceeding." The organization is not a party. The Legislature named the persons who may move, and a publishing non-party is not among them. Subsection 1(b), which governs records "filed under seal" and the other six categories of records that "are not open to public inspection except by order of the court for good cause shown," names no movant at all; the path it leaves is the Court's own supervisory power over its records, exercised on findings, which is what the Court's order of October 12,

2026 did.

Plaintiff's counsel, who has stated publicly that he "re-wrote the two statutes" enacted as NRS 121.100 and 121.110 (Exhibit 27), published his own construction of them in June 2025: "third party applications to unseal cases are not included in the categories of motions that may be brought to unseal a case, and should be summarily denied accordingly," and "[c]ases that were sealed under prior law remain sealed." Willick Law Group, Legal Note Vol. 77 (June 23, 2025), Section III. Defendant offers that statement for what it is, the published construction of the party-opponent's counsel, and not as authority.

The organization's one sentence on standing is: "A non-party news reporter may file a motion to unseal." (Motion at 3, citing SRCR 4(2).) The Rules Governing Sealing and Redacting Court Records do not apply here. SRCR 1(4) provides that the rules "do not apply to the sealing or redacting of court records under specific statutes, such as NRS Chapter 33, NRS Chapter 179, juvenile cases pursuant to NRS Chapters 62 and 63, or domestic relations matters pursuant to NRS Chapters 122 (Marriage), 123 (Rights of Husband and Wife), 125 (Dissolution), 126 (Parentage), 127 (Adoption), 128 (Termination of Parental Rights), 129 (Minors' Disabilities), 130 (Child Support) ... or to NRS Title 13 (Guardianships; Conservatorships; Trusts)."

This is a domestic relations matter under NRS Chapter 125, sealed under NRS 125.110 and now governed by NRS 121.110, which supplies its own unsealing

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procedure in subsection 4. SRCR 4(2) gives the organization nothing. Even where the rules apply, SRCR 4(2) requires service "on all parties to the action in accordance with NRCP 5," which this motion lacks (Section IV.C), and the showing SRCR 4(3) asks of the opponent of unsealing, "that compelling circumstances continue to exist," is made in Sections III and IV.D in any event. And the motion is, in substance, a request that the Court reconsider the order it entered seventy-six minutes earlier, on the same subject, without saying so and without any showing of new facts or law. (Exhibit 1; Motion at 1.) The Court may treat it as such.

C. The motion was not served on the parties who obtained the May 25, 2018 order, nor on Plaintiff.

NRS 121.110(4) requires that "[a] copy of any such motion must be served upon all parties to the proceeding." The organization's certificate of service names two lawyers. Motion at 11. Plaintiff appears in proper person; the Willick Law Group appears for her on financial issues only, in an unbundled capacity. Plaintiff was not served. (Declaration of John D. Jones, para. 4.) More fundamentally, the Order Regarding Motion to Seal of May 25, 2018 was entered on the motion of three non-parties, InCorp Services, Inc., Inenvi, Inc. and Technoir, LLC, which had been subpoenaed in this case, had moved to quash, and had produced "certain confidential trade secret information and proprietary business records" under the Stipulated Confidentiality Agreement and Protective Order of May 13, 2016 and the Discovery Commissioner's protective order of November 1, 2016, "in reliance on the Court's

order sealing the case and the Protective Orders." (Exhibit 14 Marquis Aurbach letter, Aug. 31, 2017, at 1; Joinder, Sept. 25, 2017, at 3).

Their joinder invoked the provisions now designated SRCR 3(4)(g) and (h), which recognize the protection of trade secrets and "another identified compelling circumstance" as grounds for sealing, and stated that "[t]he Non-Parties were not a part of any extra judicial contact" and that the stated purpose of any unsealing "in no way impacts the need for protection of the Non-Parties' financial records." Id.

The order the organization asks the Court to set aside is theirs. They were not served, and the fourteen days EDCR 5.502(c) gives any respondent never began to run as to them; they learned of the motion, appeared through counsel, and filed their opposition within the date the Court set. An order vacating a seal obtained by three non-parties, entered without notice to them, would not have survived the first challenge to it. Defendant asks that no order altering the May 25, 2018 order be entered except on the record the non-parties have now made and after they have been heard on it.

D. The motion makes no showing on any factor NRS 121.110(5) names, and the record on each factor favors the seal.

The movant carries the burden of showing good cause. NRS 121.110(4), (5). Subsection 5 directs the Court to consider "(a) Whether the court record contains information made confidential by federal or state law or regulation or court rule; (b) Whether federal or state law or regulation or court rule provides that any information

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in the court record is not a public record; (c) The interests of the party seeking to unseal the record; and (d) Whether unsealing the record would create a substantial risk that a party to the proceeding or child involved in the proceeding may suffer harassment, indignity, undue embarrassment or any other physical or emotional harm." The motion addresses none of these considerations. It states the organization's interest as the narration of "what ONJ refers to as the 'Ansell Saga'" and "the blast radius of ONJ's ongoing reporting," Motion at 4, and offers to "defer" the statutory analysis if no one opposes. (Motion at 5.)

The records the motion would open are, by category, the records the statute itself closes: financial disclosure forms (NRS 121.110(1)(b)(1)); documents filed under seal by orders of 2015, 2016, 2018 and 2019 ((1)(b)(2)); confidential exhibits produced under two protective orders ((1)(b)(4)); child custody evaluations ((1)(b)(5)); medical, psychiatric and psychological evaluations and reports ((1)(b)(6)); and the records of closed hearings, which NRS 121.100(8) makes "confidential and not open to inspection or copying by persons except the parties, the counsel for the parties and such staff and experts as the counsel for the parties deem necessary," and whose distribution NRS 121.100(9) and EDCR 5.212(e) forbid ((1)(b)(7)). Section III.C above.

The organization's motion reads one of the seven categories, "(3) Documents sealed by a court pursuant to subsection 3," as if it were the whole statute, Motion at 5; the other six have nothing to do with subsection 3 and close these records whether

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or not any compelling-interest finding was ever made. Subsection 2's presumption of openness is, by its own terms, "[e]xcept as otherwise provided in subsection 8 of NRS 121.100" and subject to subsection 1(b). The records here are "filed under seal" by orders entered under the statute then in force; the Legislature listed that category, did not re-open it, and gave no non-party a motion. Again, how (and why?) is the organization seeking to set aside orders that are eight (8) years old?

The organization's interest, in its own words, is its coverage product. The public interest in the operation of this Court is served by the categories the statute itself excepts and by the Court's procedure of October 8, 2019 for any particular record on a particular showing, and the one episode of this case that was ever public, the recusal of September 2017, was reported in the press nine years ago, as the organization's own Exhibit 1 shows.

What the organization asks for is the parties' and experts' filings and the recordings of a sealed custody and financial case, which the recusing judge himself, in the order the organization relies on, said "should remain sealed." (Exhibit 5 at 10.) It seeks this well beyond any temporal requirement for challenging an order. Its interest in this file, as the record shows it, is the one described in Section III.F: it was told in January 2026 that the case is sealed and a release order is required, chose not to move, published a recording of a sealed hearing of this case in October, and filed this motion seventy-six minutes after the Court declined its request to record the proceedings. The organization's publications since it entered this case include, a

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sealed recording of this case on October 8, the child's civil case on October 14 and her guardianship matter on October 16, each while this motion was pending or about to be filed, tell the Court what the motion is for, and its captions tell the Court how it publishes a record: the October 14 recording and at least six recordings of a closed insurance action are filed under the case number of an unrelated eviction appeal, a commercial action by three companies against Plaintiff's counsel and his firm is titled "Incorp vs I.A., a Mother," a hearing of May 10, 2022 in that action is dated May 5, and two descriptions state that "Mr. Ansell represented herself." (Declaration of Douglas Ansell, paras. 4, 13.) No further showing on factor (c) is needed, and the organization has offered none. Clearly this type of publication of ancient history is solely sought for harassment.

Every court has supervisory power over its own records and files, and access has been denied where those files "might have become a vehicle for improper purposes," including use "to gratify private spite or promote public scandal." Nixon v. Warner Communications, Inc., 435 U.S. 589, 598 (1978); Kamakana v. City & County of Honolulu, 447 F.3d 1172, 1179 (9th Cir. 2006). Defendant asks the Court to weigh the interest the movant has stated against the interests the statute names, and to weigh beside it the interest of the one participant in this case who supports the motion.

The timing of the organization's motion, and of Plaintiff's counsel's support for it, has its own explanation in the record. Defendant's two applications for an order

to show cause, filed September 2 and October 25, 2022, concern Plaintiff's counsel's transmission of material from the sealed file of this case to the Abrams Law Firm, a transmission his own verified opposition of September 30, 2022 admits. (Exhibit 15.) Those applications have never been heard; Defendant's Motion to Strike of December 31, 2025 told the Court that they remain pending. (Motion to Strike, Dec. 31, 2025, at 5 n.2.)

On June 23, 2025 Plaintiff's counsel published, under his own name, that "[c]ases that were sealed under prior law remain sealed" and that "third party applications to unseal cases are not included in the categories of motions that may be brought to unseal a case, and should be summarily denied accordingly." (Exhibit 29 at 6.) The same note states that the Falconi decision "did not address the former sealing statute, NRS 125.110." (Exhibit 29 at 6.) On October 11, 2026 Plaintiff's counsel astonishingly wrote to the organization's founding director, copying the Court's staff, that the sealing statute "and its associated local rules were struck down as unconstitutional" in Falconi, that "it could be argued that no such orders are now in effect," and that his staff could "dig out the relevant orders, transcripts, etc." for the organization. (Exhibit 23 at 1.)

On October 14, 2026 a memorandum filed in Plaintiff's name by counsel whose appearance in this case is limited to the financial issues listed, as the first interim order needed, "[t]o unseal the case for the attendance of the media." (Exhibit 25 at 3; Exhibit 17 Minutes of October 19, 2026, parties). Its certificate of service

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lists Defendant's counsel only. (Exhibit 25 at 14.) Plaintiff did not ask for that relief and does not want this case unsealed for the media. (Declaration of Douglas Ansell, paragraph 10.) An order opening the file now would neither reach nor excuse a transmission made while the orders were in force, and nothing decided on this motion decides the applications. But in weighing whose interest the motion serves, the Court may take into account that the one participant who has reversed his published position on sealing within a year is the one whose transmissions of this file are the subject of the OSC applications that await a hearing. Why that reversal came when it did is a matter for discovery, and the evidentiary hearing on the applications.

Section III.A sets out what this Court, the Court of Appeals and the Nevada Supreme Court have found about the filings the organization would publish. (Exhibits 12 and 13.) Publication of a decade of such filings, as written, would create precisely the "substantial risk" of "harassment, indignity, undue embarrassment" the statute names, to a party and to the parties' minor child, whose medical, educational and custody records, evaluations and photographs are in them. NRS 121.110(3) deems the child's protection a compelling interest that outweighs the public interest in access. And the organization has shown, in its publication of October 14, 2026, what its stated policy of redacting "parents and children" produces when a proceeding to which the child is a party is published: the child's claims and custody status are discussed, and the caption track goes silent for seven seconds. Section

III.E. The risk under factor (d) is not speculative; it is on the organization's channel, which since then carries two hearings from the child's own guardianship matter. And the Florida measure described in Section III.D marks a prosecutor's child's name, photograph, date of birth and school as information kept from public disclosure; a published record of this case, indexed under her parents' names, is that disclosure. Why do the organization and Plaintiff's counsel (not Plaintiff) think this is acceptable?

The May 25, 2018 order was entered to protect trade-secret and proprietary records produced under protective orders in reliance on the seal. (Exhibit 14.) SRCR 3(4)(g) and (h), provisions of the rules the organization itself invokes, recognize the protection of trade secrets and "another identified compelling circumstance" as grounds for sealing. The companies' records and the forensic accounting built on them are confidential exhibits within NRS 121.110(1)(b)(4) and documents filed under seal within (1)(b)(2), and nothing in the organization's motion addresses them. The non-parties' own oppositions set out that record, and Defendant does not repeat it but incorporates it by reference.

E. The organization's authorities do not reach this file.

The organization leads with New York Times Co. v. Second Judicial District Court (Doe 1 Trust), 141 Nev. Adv. Op. 71 (Dec. 23, 2025), a trust case in which the district court had read the trust statutes to mandate sealing without the exercise of discretion and had not considered redaction. (Motion at 6.) The decision requires

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individualized, document-level findings and endorses sealing of particular documents on non-speculative findings and redaction of the rest. Id., slip op. at 3-4, 11, 13-16, 19. That is the regime already in place here: the file is sealed by category under the orders set out in Section III.B, any particular record is obtainable on a particular showing through the procedure the Court set on October 8, 2019, the Court upheld the amended order on October 12, 2026, and this Opposition supplies the category-by-category findings on this motion.

The Supreme Court's later decision on the organization's own petition in the same matter, Our Nevada Judges, Inc. v. First, Second and Eighth Judicial District Courts, 142 Nev. Adv. Op. 16 (Feb. 26, 2026), which the motion does not cite, holds that "the district court is compelled to engage in individualized, 'thoughtful, reasoned judicial decision-making . . . in identifying the compelling interests at stake,'" and that "[t]he personal interests at stake are necessarily particular to each real party in interest, and the public interest will vary by case type as well." Id. (slip op. at 6-7) (quoting Falconi v. Eighth Judicial District Court, 140 Nev. 79, 87, 543 P.3d 92, 99 (2024)). Falconi itself holds that closure of family proceedings "can and will be warranted" when the court exercises its discretion; the vice it corrected was closure without discretion. 140 Nev. at 87, 543 P.3d at 99 (slip op. at 14). Its footnote 2 confines the opinion to NRS 125.080, EDCR 5.207 and EDCR 5.212; it did not construe NRS 125.110, and when a challenge to sealing under that statute later reached the Supreme Court, it was resolved as moot on the statute's repeal, not under

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Falconi. Gamble v. Eighth Judicial District Court, No. 88678 (Nev. Oct. 24, 2025) (order denying petition for writ of mandamus). Nester v. Eighth Judicial District Court, 141 Nev. Adv. Op. 4 (Jan. 30, 2025), says the same: a hearing "nevertheless may be closed when a party demonstrates that privacy interests outweigh the public's right to court access." Id. (slip op. at 2). The Court is exercising that discretion, on findings, on a record. Johanson v. Eighth Judicial District Court, 124 Nev. 245, 182 P.3d 94 (2008), held that NRS 125.110 did not permit the sealing of pleadings, findings, orders on motion and judgments, and the August 13, 2019 order recites those categories; nothing in Johanson or in the statute reaches the motions, exhibits, transcripts and recordings the organization asks for, and nothing in either "impinges on this Court's authority to make any orders which are in the best interests of the minor child." (Reply Oct. 3, 2019 at 5.)

Las Vegas Review-Journal, Inc. v. Eighth Judicial District Court (Chasing Horse), 142 Nev. Adv. Op. 31 (Apr. 23, 2026), concerned a prior restraint on the publication of a name that had already appeared throughout the publicly filed transcripts of an open criminal trial. Defendant seeks no restraint on anything the organization publishes; the question here is access to a sealed family file, not what the organization may say. The alternative the Supreme Court described there, that the district court "could have simply sealed the full transcript and redacted the publicly filed version," id. (slip op. at 4 n.2), concerns a name on an otherwise public page, not the records of a sealed family file, where the question is which categories

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stay closed.

Nor can material that reached the public without authorization be cited as the reason that the seal is futile; how the Court's sealed recording of August 30, 2017 came to be published is the subject of the pending OSC applications, not a ground for opening the rest. Abrams v. Sanson, 136 Nev. 83, 458 P.3d 1062 (2020), holds that speech about a lawyer's conduct can concern an issue of public interest for anti-SLAPP purposes; it says nothing about access to a sealed family file, and the lawyer-conduct record the organization says the public needs is the record of the pending applications, which Defendant has asked be heard in open court on the Court's own recording.

Del Papa v. Steffen, 112 Nev. 369, 915 P.2d 245 (1996), concerned the Supreme Court's own proceedings; here every order on motion, the findings, the judgment and the Order of Recusal are open, and what is sealed is the parties' and experts' filings and the child's record. Grae v. Corrections Corp. of America, 134 F.4th 927 (6th Cir. 2025), and In re Cendant Corp., 260 F.3d 183 (3d Cir. 2001), apply the federal common-law right of access to sealed documents in civil litigation with no child, no statutory category list and no state sealing statute; Richmond Newspapers, Inc. v. Virginia, 448 U.S. 555 (1980), concerns attendance at a criminal trial. None addresses a family file sealed by statute and by orders of this Court entered on notice.

F. The record the motion misstates.

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The record shows the following. The written Order of Recusal of September 5, 2017 did not unseal "the entire divorce"; it kept the parties' and experts' filings sealed and opened hearing recordings and orders only, as Plaintiff's own 2019 motion described it. (Exhibits 5 and 7.) The May 25, 2018 order was not entered "through various orders" of the Court's own motion; it was entered on the unopposed motion of three non-parties, and the August 13, 2019 order, entered on Plaintiff's own motion, recited the categories the statute then excepted and permitted court-supervised production of discovery in the other actions; it sealed nothing and it opened no motion, exhibit, transcript or recording. (Exhibits 6 and 7.) SB 432 was enacted in 2025, not 2024. Stats. 2025, ch. 505, approved June 10, 2025, effective October 1, 2025. The Clerk is not refusing to release filings because the seal is "in a state of flux"; the Clerk's e-mail, the organization's own Exhibit 2, states that the case is sealed, that the organization is not a party, and that a release order is required.

The civil action A-18-777318-C was brought in the child's name through her guardian, not by Defendant over the disclosure of his own medical records. Motion at 3 n.6. The organization's sworn count of "280 J.A.V.S. videos" concerns nine other cases and not this one. Motion at 3. And NRS 121.110(1)(b) lists seven categories of closed records, six of which have nothing to do with the strict-scrutiny sealing of subsection 3. Motion at 5. Defendant states these matters because the Court's order will be reviewed, if at all, on the record, and the record should be accurate.

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G. Findings, hearing and the form of any order.

The organization's motion requests no hearing, and the Court has said it will decide on the briefs. Defendant respectfully requests oral argument under EDCR 5.502(h), that the pending applications be set for evidentiary hearing (unless the Court denies the Motion) before any record is opened, and that the Court's order on the motion carry findings. The findings are offered to protect the Court's order on any review, where a petitioner would look for the NRS 121.110(5) and SCR 230(2) record; the Court's order of October 12, 2026 needed none, and Defendant does not suggest otherwise. The proposed order lodged with this Opposition sets out the findings Defendant asks the Court to make (which would be impossible without an evidentiary hearing): that the file has been sealed since October 16, 2015 by the orders described in Section III.B, in reliance on which the parties, the non-parties and the court-appointed neutral produced records; that the sealed record contains the categories of records NRS 121.110(1)(b)(1) through (7) and EDCR 5.212(e) close; that it contains the personal identifying, medical, educational and custody information and photographs of the parties' minor child, whose protection is a compelling interest under NRS 121.110(3) and whose name, photograph, date of birth and school are information that the law of the state where Plaintiff serves as a prosecutor keeps from public disclosure, Fla. Stat. 119.071(4)(d)2.f, which bears on the risk NRS 121.110(5)(d) names.

The Court has already found that Plaintiff's filings were "intended to harass

the Defendant" and that material in the file "should not have been in her possession," so that publication of the sealed filings would create a substantial risk of harassment, indignity and undue embarrassment to a party and to the child. The movant's stated interest is its coverage of related public cases, which it already publishes, and the open records serve the public interest in the operation of this Court. The movant identified no particular record and made no showing of good cause. The movant was told by the Clerk on January 22, 2026 that the case is sealed and a release order is required, did not move for nine months, and published a recording of a sealed hearing of this case on October 8, 2026. On October 14, 2026, while its motion was pending, the movant published a recording of a hearing in a case in which the parties' minor child is a party, under a title naming Defendant, opening on a passage taken from later in the hearing, with a description that misstates the case number, and on October 16, 2026 two recordings of hearings in the child's guardianship matter. The non-parties who obtained the May 25, 2018 order were not served.

Redaction of a decade of filings and recordings is not a less restrictive alternative on this record; the sealing orders as the Court administers them under its ruling of October 8, 2019 are the narrowly tailored regime. Defendant's pending applications of September 2 and October 25, 2022 are collateral to this motion and are neither decided nor stayed by the Court's ruling on it or by any request for relief from that ruling. And the parties' minor child is a non-consenting participant within SCR 240(1) in every proceeding of this case, whose name, image, date of birth,

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medical, educational and custody information are excluded from any electronic coverage of any proceeding in this case and from any record opened by any order of this Court. No finding about any person's purpose is requested.

If the Court is inclined to open anything, Defendant asks that nothing be opened except by category, on findings as to each, after a hearing under EDCR 5.502(h), and that the following be excluded from any order whatever else is opened: (1) the attachments to Plaintiff's Pretrial Memorandum of May 9, 2016 struck by the order of March 13, 2020; (2) the unadmitted 2016 binders; the court-appointed neutral's filings left-side filed by the Stipulation and Order of July 16, 2021 and the remaining filings of that expert; (3) every record within NRS 121.110(1)(b)(1), (4), (5), (6) and (7); every record concerning the parties' minor child, including every record that references the guardianship matter or the child's claims in A-18-777318-C; the non-party companies' records and the forensic accounting; the recordings and transcripts of closed hearings (NRS 121.100(8)); and (4) the motions, oppositions, replies and exhibits of the parties that the findings quoted in Section III.A describe, which, if any were opened, should carry those findings with them; and the pending applications for an order to show cause and their exhibits.

Defendant further asks, as the first alternative to denial, that no order opening any motion, opposition, reply, transcript or recording issue until the pending applications of September 2 and October 25, 2022 are decided, for the reasons in Section IV.A. Defendant asks for no fees or sanctions on this Opposition, and

nothing in it asks the Court to restrain anything the organization publishes.

V. CONCLUSION

Part of the reason a previously unchallenged sealing order must be maintained in this case is the pattern of misrepresentations made by Plaintiff's counsel throughout this case. The organization is not a stranger that happened upon this file. Its founding director is an employee of the Abrams Law Firm, the firm to which Plaintiff's counsel sent the sealed transcript in 2022 (Section III.B; Exhibit 15; Declaration of Alexander M. Falconi, filed June 24, 2026 in A-19-792105-B, para. 15); its staff attorney is the associate of Plaintiff's counsel who signed the motion at Exhibit 7 (Exhibit 32); Plaintiff's counsel commented publicly on its first publication of this case and offered its director his staff to "dig out the relevant orders, transcripts" (Exhibits 23, 27). Its coverage of this case follows the positions of Plaintiff's counsel and not those of Plaintiff, who does not want it (Declaration of Douglas Ansell, paras. 4, 10; Section III.E). It arrived on this docket the night Plaintiff's counsel filed a lien asserting $3,296,346.64 against Plaintiff's recovery and two fee motions, and the request to open the case for the media was filed by that counsel two weeks later (Section III.F). Defendant and his counsel states this understanding of that sequence plainly: this case is being opened to public view, with plaintiff's counsel's face on the organization's graphic, to coerce a settlement, for the benefit of the lien. The Court need not decide that here; NRS 121.110(5)(c) directs it to weigh whose interest the motion serves, and the record of that interest is

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set out above.

Defendant respectfully requests that the Court: (1) deny the Motion to Unseal Case File, with the findings set out in the proposed order; (2) order that the organization's motion, which names a guardianship matter by case number and carries a footnote on matters outside this record, be maintained in the sealed file of this case and not placed on any public index; (3) set the motion for hearing under EDCR 5.502(h), set Defendant's pending applications for an order to show cause of September 2 and October 25, 2022 for evidentiary hearing on their own track, find that the applications are collateral to this motion and are neither decided nor stayed by the Court's ruling on it or by any request for relief from that ruling, and stay any order opening any record of this case until that hearing is held; (4) order that no order altering the Order Regarding Motion to Seal of May 25, 2018 be entered except on the oppositions filed by InCorp Services, Inc., Inenvi, Inc. and Technoir, LLC and after they have been heard, and until the organization has served Plaintiff in proper person and she has had the time EDCR 5.502(c) allows to respond; (5) alternatively, defer any ruling on unsealing until the pending applications of September 2 and October 25, 2022 are decided; (6) in the further alternative, open nothing except by category, on findings, after a hearing, with the exclusions set out in Section IV.G; (7) find that the parties' minor child is a non-consenting participant within SCR 240(1) in every proceeding of this case and that her name, image, date of birth, medical, educational and custody information are excluded from any electronic

coverage of any proceeding in this case and from any record opened by any order; and (8) grant such other relief as is just. Defendant seeks no fees or sanctions on this Opposition.

DATED this 6th day of November, 2026.

JONES & LOBELLO

/s/ John D. Jones, Esq.
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Attorneys for Defendant,
DOUGLAS ANSELL

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DECLARATION OF JOHN D. JONES, ESQ.

I, John D. Jones, declare under penalty of perjury under the law of the State of Nevada that the following is true and correct:

1. I am counsel of record for Defendant in this action and have personal knowledge of the matters stated here.

2. Exhibits 1 through 23, 25 and 31 are true and correct copies of the orders, filings, minutes, transcript pages, notices and e-mail correspondence of this case identified in the Index of Exhibits, as they appear in the Court's file and as served on or received by me. Exhibits 2 through 11, 13 through 15, 21, 22 and 25 are records of this sealed case and are filed in the sealed record.

3. The Motion to Unseal Case File was served on me through the Court's electronic service system on October 12, 2026. Its certificate of service names Marshal Willick, Esq. and me. It does not name Plaintiff, who appears in this action in proper person, the Willick Law Group appearing for her on financial issues only in an unbundled capacity, and it does not name InCorp Services, Inc., Inenvi, Inc. or Technoir, LLC, the non-parties on whose Ex Parte Motion to Seal the Order Regarding Motion to Seal of May 25, 2018 was entered.

. . .

. . .

. . .

. . .

4. On May 9, 2018, at the hearing on the non-parties' motion to seal, Plaintiff's counsel was present and did not oppose the motion.

I declare under penalty of perjury, under the laws of the State of Nevada and the United States (NRS 53.045 and 28 U.S.C. § 1746), that the foregoing is true and correct.

Executed on November 6, 2026, at Las Vegas, Nevada.

/s/ John D. Jones, Esq.
JOHN D. JONES, ESQ.

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DECLARATION OF DOUGLAS ANSELL

I, Douglas Ansell, declare under penalty of perjury under the law of the State of Nevada that the following is true and correct:

1. I am the Defendant in this action and have personal knowledge of the matters stated here.

2. I do not consent, and have never consented, to the publication of any record of this case, or of any record concerning the parties' minor child, by Our Nevada Judges, Inc. or anyone else. I do not reside in Nevada. It is also my understanding that my ex-wife, Plaintiff in this case, does not desire to have our case unsealed.

3. On October 8, 2026 I viewed, and preserved a copy of, the video the organization published that day captioned "Coverage will be provided from the Eighth Judicial District Court." It opens with the organization's narration, which states that interest in this case stems from Mr. Sanson's involvement in my divorce, "the recusal of District Court Judge Bryce Duckworth, the suspension of successor Senior Judge Nancy Saitta," and, as those words are spoken, displays a card under Senior Judge Saitta's name reading "Removed from the bench." For about ninety seconds it then displays the Court's own recording of the hearing held in this case on August 30, 2017, with the recording system's date and time stamp visible in the picture.

4. On October 14, 2026 the organization published a recording it titled with my name and Plaintiff's counsel's name and dated January 29, 2019. I downloaded

it the same day and preserved the file, its caption track and the organization's description, which gives the case number of an unrelated eviction appeal and describes Plaintiff's counsel as "the defendant." It is a hearing in the civil action A-18-777318-C, on a motion to dismiss a counterclaim pleaded against me individually and as guardian of the parties' minor child. The recording opens on two passages taken from later in the hearing and placed before the call of the case, the first of them the presiding judge's words about the action; what follows discusses the child's claims, the status of this divorce and its custody arrangement as of that date, and a then-pending petition for a guardian ad litem. The organization's caption track is silent for seven seconds during the judge's statement of the parties to the counterclaim. A complete copy is preserved and is available to the Court on request.

5. In January 2020, when the Court directed that the profile picture I then used on Facebook be removed, I removed it and replaced it with a photograph of me alone, which has not changed since. My profile picture does not depict the minor child.

6. Exhibits 24, 26 and 27 are true and correct prints of the organization's publication of October 8, 2026, its article of October 14, 2026 and post of October 15, 2026 and Plaintiff's counsel's public comment of October 11, 2026 on the organization's page, as I captured and preserved them, with the capture dates shown on them.

7. On October 16, 2026 the organization posted on its public channel two recordings of hearings in the guardianship matter concerning the parties' minor child,

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each titled as a hearing in her guardianship; the organization's website lists both under that matter's case number. I viewed them on the channel, and on October 21, 2026 I preserved copies of each recording, its caption track and the organization's listing. Complete copies are available to the Court on request.

8. Exhibit 28 is a true and correct print of the public listing for Plaintiff in the Florida Bar's member directory as it was displayed on October 8, 2026, printed at my direction, with the listed photograph, cell telephone number and e-mail address redacted and nothing else altered.

9. Exhibit 29 is a true and correct print of the article titled Vol. 77, The Past, Present, and Future of Closed Hearings and Sealed Files in Family Court, dated June 23, 2025 and published under Plaintiff's counsel's name on his firm's website, as it was displayed on October 27, 2026, printed at my direction and not altered.

10. Plaintiff has told me that she did not ask for media coverage of this case and does not want it.

11. Exhibit 30 is a transcript excerpt, with time stamps, of the testimony of the organization's founding director before the Senate Committee on Judiciary on April 9, 2025, prepared at my direction from the Legislature's public video recording of the hearing and checked against the committee's published minutes, which report the testimony in the same words, together with the committee's agenda and minutes of that hearing and the Legislature's bill page for S.B. 432, printed at my direction on October 28, 2026 and not altered. The excerpt is not a certified transcript.

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12. Exhibit 32 is a true and correct print of the organization's staff page as it was displayed on October 23, 2026, printed at my direction and not altered.

13. I have preserved the organization's listings and descriptions for its recordings of the civil actions to which I or companies I own were parties, as displayed on its channel between October 8 and November 5, 2026, with capture dates. Among them: six recordings of hearings in Ansell v. Farmers Insurance Exchange, A-18-785411-C, published October 18, November 3 and November 4, 2026, each listed under case number A-18-778260-A, the number of my unrelated eviction appeal; seven recordings of hearings in InCorp Services, Inc. v. Willick, A-16-741444-C, a commercial action by InCorp Services, Inc., Inenvi, Inc. and MyLLC.com, Inc. against Plaintiff's counsel and his firm in which Plaintiff was one of the named defendants, each titled "Incorp vs I.A., a Mother"; a recording of the hearing of May 10, 2022 in that action published under the date May 5, 2022; and the descriptions of two recordings, of an October 5, 2021 hearing in that action and of a February 11, 2019 hearing in the guardianship matter concerning the parties' minor child, each stating that "Mr. Ansell represented herself." Complete copies of the listings are available to the Court on request.

I declare under penalty of perjury, under the laws of the State of Nevada and the United States (NRS 53.045 and 28 U.S.C. § 1746), that the foregoing is true and correct.

Executed on November 6, 2026.

/s/ Douglas Ansell
DOUGLAS ANSELL

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INDEX OF EXHIBITS

Exhibit 1: Order Denying Media Request and Order Allowing Camera Access to Court Proceedings, filed October 12, 2026, with its Exhibit A (the SCR 230 request form).

Exhibit 2: Order to Seal Records, filed October 16, 2015, with Notice of Entry of October 19, 2015 (sealed record).

Exhibit 3: Order to Seal Records, filed November 23, 2016 (sealed record).

Exhibit 4: Order from July 20, 2016 Hearing, filed September 8, 2016 (page 7); Confidentiality Order, filed September 23, 2016; Stipulated Confidentiality Agreement and Protective Order, filed May 13, 2016, with Notice of Entry of May 18, 2016 (sealed record).

Exhibit 5: Order of Recusal, filed September 5, 2017 (sealed record).

Exhibit 6: Order Regarding Motion to Seal, filed May 25, 2018, with Notice of Entry of Order of May 30, 2018 (sealed record).

Exhibit 7: Plaintiff's Motion to Amend Sealing Order, filed August 6, 2019 (pages 1-5); Order Amending Sealing Order, filed August 13, 2019; Defendant's Ex Parte Motion to Stay, filed August 13, 2019 (page 3) (sealed record).

Exhibit 8: Court Minutes of October 8, 2019 and Transcript of Proceedings of October 8, 2019, pages 37-38 and 50-52 (sealed record).

Exhibit 9: Order from January 16, 2020 Hearing, with Notice of Entry of February 20, 2020 (sealed record).

Exhibit 10: Stipulation and Order (Strike Exhibits to Plaintiff's Pre-Trial Memorandum), filed March 13, 2020, and Order to Remove E-Service Contacts, filed March 13, 2020, with Notices of Entry of March 20, 2020 (sealed record).

Exhibit 11: Stipulation and Order, filed July 16, 2021 (the neutral expert's filings) (sealed record).

Exhibit 12: Findings of Fact, Conclusions of Law and Orders Regarding Post-Trial Motions dated November 3, 2021, at 3-7 and 12-13, and Court of Appeals

Order Affirming in Part, Reversing in Part, Vacating in Part and Remanding, No. 83916-COA, May 28, 2024 (pages 12-14 and 22-23).

Exhibit 13: Amended Decree of Divorce, filed February 9, 2021 (page 24), and Transcript of Decision, May 9, 2018 (pages 35-36) (sealed record).

Exhibit 14: Letter of Marquis Aurbach Coffing to the Chief Judge dated August 31, 2017, and Non-Parties' Joinder filed September 25, 2017 (sealed record).

Exhibit 15: Plaintiff's Opposition to Defendant's Renewed Motion for an Order to Show Cause, filed September 30, 2022 (pages 3-5 and 12) (sealed record).

Exhibit 16: Our Nevada Judges, Inc., Notice of Coverage Policies for Domestic Relations Matters, served September 30, 2026.

Exhibit 17: Minute Orders of October 14, 2026 and October 19, 2026.

Exhibit 18: Order Denying Defendants' Motion for Attorney's Fees, Haojia LLC v. Willick, No. A-19-792105-B, filed September 23, 2026 (page 5).

Exhibit 19: Findings of Fact and Conclusions of Law, A-18-777318-C, filed April 11, 2023 (Conclusion 9), and Transcript of March 29, 2023 (pages 5-7).

Exhibit 20: Recorder's Transcript of Jury Trial, Day 5, Haojia LLC v. Willick, No. A-19-792105-B, August 25, 2023 (pages 89-92).

Exhibit 21: Order from July 19, 2016 Hearing, filed August 10, 2016 (paragraph 24); Court Minutes of March 23, 2018 and Transcript of March 23, 2018 (pages 40-41); Court Minutes of October 26, 2017; Order from October 26, 2017 Hearing, filed July 1, 2019 (pages 2-3) (sealed record).

Exhibit 22: E-mail exchange of August 30, 2017 between counsel (the written offer, the reply of Plaintiff's counsel's associate, and the reply of Plaintiff's counsel), Exhibit C to Defendant's Motion for Attorney's Fees and Costs filed March 19, 2021 (sealed record).

Exhibit 23: E-mail thread on the organization's media request, September 30 to October 11, 2026, as received by Defendant's counsel through the Court's electronic service system and by e-mail, including the organization's message of

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October 10, 2026 to the Court's staff and Plaintiff's counsel's reply of October 11, 2026 (one non-party redacted).

Exhibit 24: The organization's publication of October 8, 2026 (prints of the page and of frames of the video, with capture dates).

Exhibit 25: Plaintiff's Case Management Conference Memorandum, filed October 14, 2026 (caption page, page 3 and the certificate of service, page 14) (sealed record).

Exhibit 26: The organization's article of October 14, 2026 and post of October 15, 2026 (prints with capture dates).

Exhibit 27: Public comment of Plaintiff's counsel of October 11, 2026 on the organization's post of October 8, 2026 (the text of the comment as captured, with capture dates and hashes; two non-parties redacted).

Exhibit 28: The Florida Bar, Find a Lawyer member directory, public listing for Plaintiff (Office of the State Attorney, 17th Cir, Fort Lauderdale), as displayed on October 8, 2026, with the listed photograph, cell telephone number and e-mail address redacted.

Exhibit 29: Willick Law Group, Legal Note Vol. 77, The Past, Present, and Future of Closed Hearings and Sealed Files in Family Court (June 23, 2025), as published at willicklawgroup.com, printed October 27, 2026.

Exhibit 30: Testimony of the organization's founding director in opposition to S.B. 432 before the Senate Committee on Judiciary, 83rd Session (Nev. Apr. 9, 2025): transcript excerpt prepared from the Legislature's public video recording (YouTube id DLejGTmWkT0), with time stamps, and the committee's published record of the hearing.

Exhibit 31: Appellant's Motion to File Opening Brief and Appellant's Appendix Under Seal, Ansell v. Ansell, No. 83916 (Nev. Oct. 13, 2022), Document 2022-32376 (sealed appellate record).

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Exhibit 32: Our Nevada Judges, Inc., staff page (ournevadajudges.com/staff), as displayed on October 23, 2026, printed at Defendant's direction.

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