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10 Attorneys for Defendants  
11 CLARK COUNTY and GEORGINA STUART

12 DISTRICT COURT  
13 CLARK COUNTY, NEVADA

14 STEVE EGGLESTON,

15 Plaintiff,

16 v.

17 GEORGINA STUART; CLARK COUNTY,  
18 NEVADA; LISA CALLAHAN; BRIAN  
19 CALLAHAN; AND DOES I THROUGH 100,  
20 INCLUSIVE,

21 Defendants.

22 CASE NO. A-16-748919-C  
23 DEPT. NO. IX

24 **MOTION TO RECONSIDER AND/OR  
25 REVOKE ORDER GRANTING MEDIA  
26 REQUEST ALLOWING CAMERA  
27 ACCESS TO COURT PROCEEDINGS**

28 **HEARING REQUESTED**

29 COME NOW Defendants CLARK COUNTY and GEORGINA STUART, by and  
30 through their attorneys of record, and hereby submit their Motion To Reconsider And/Or Revoke  
31 Order Granting Media Request Allowing Camera Access To Court Proceedings. This Motion is  
32 made and based upon all papers, pleadings and records on file herein, the attached Points and  
33 Authorities, and such oral argument, testimony and evidence as the Court may entertain.

34 ///

1 **POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 This case involves four non-party Minors, HIPAA-protected information regarding  
4 nonparties, and information and documents that are confidential pursuant to NRS 432B.280  
5 and a Protective Order. Therefore, this Court should reconsider and/or revoke the Order  
6 Granting Media Request Allowing Camera Access To Court Proceedings entered without an  
7 opportunity to respond.  
8

9 **II. FACTUAL AND PROCEDURAL BACKGROUND**

10  
11 On 8/10/17, Plaintiff filed a First Amended Complaint (“FAC”) alleging a violation of  
12 42 U.S.C. § 1983, conspiracy to violate 42 U.S.C. § 1983, intentional infliction of emotional  
13 distress (IIED), and defamation, libel and slander claims against Defendants. Plaintiff alleges  
14 he’s the father of two young boys (Minor Son 1 and Minor Son 2, the Eggleston Boys ).<sup>1</sup> This  
15 matter relates to Defendants’ investigation regarding four children after one child called 911  
16 reporting that their mother, Laura Battistella (“Battistella”), had spoken words of suicidal  
17 ideation.<sup>2</sup> None of the Minors and/or children are parties to this Action.<sup>3</sup> On or about 1/6/15,  
18 Defendant Stuart arrived at the family house with police.<sup>4</sup> On that same date and at that same  
19 time, Plaintiff was represented by and consulted with and spoke to his counsel, Emily  
20 McFarling, Esq.<sup>5</sup> On 1/7/15, Plaintiff and Battistella signed a temporary guardianship giving  
21 Defendants Lisa and Brian Callahan temporary guardianship over the children.<sup>6</sup> Thereafter,  
22  
23

24 <sup>1</sup> See FAC, ¶1.

25 <sup>2</sup> Id. at ¶¶5, 7 and 10.

26 <sup>3</sup> Id. at p. 1; Order dated 7/31/17, ¶¶12 and 13.

27 <sup>4</sup> Id. at ¶26(a).

28 <sup>5</sup> Id. at ¶26(f) and (g).

<sup>6</sup> Id. at ¶26(i).

1 Defendants Lisa and Brian Callahan temporary guardianship over the children.<sup>6</sup> Thereafter,  
2 Defendants Callahan removed the children from Nevada and took them to Indiana or the  
3 greater Chicago area.<sup>7</sup>  
4

5 On 3/30/15, Defendant Lisa Callahan filed a Guardianship Action regarding the Minors  
6 in the Will County Circuit Court, Joliet, Illinois, which remains pending.<sup>8</sup> On 7/10/15, the  
7 Illinois Court, after speaking with Eighth Judicial District Court Judge William Potter, entered  
8 an Order establishing it has sole and exclusive jurisdiction over the minor children; that the  
9 minor children shall not be removed from the Court's jurisdiction without specific Order of this  
10 Court; and the minor children shall remain in the sole physical custody of the guardian, Lisa  
11 Callahan.<sup>9</sup> The Illinois Action remains pending.<sup>10</sup>

12 On 12/11/2021, the parties entered into a Protective Order, in which “The Parties  
13 acknowledge that DFS case records and the files and documents of any child who has had  
14 contact with DFS contain sensitive information that is generally protected from disclosure  
15 pursuant to federal and state law, including...” regarding information that identifies an  
16 applicant or recipient of child welfare, medical data, child abuse reports and investigations,  
17 etc., which is deemed confidential and also confidential pursuant to NRS 432B.280.<sup>11</sup> Also, “6.  
18 Confidential Information shall only be used for purpose of prosecution, defense, or settlement  
19 of this action, and for no other purpose.”<sup>12</sup> Furthermore:

20 14. If any Party or non-Party includes in papers to be filed with the Court: (i)  
21 documents designated as containing Confidential Information, (ii) any portion of a  
22 deposition transcript designated as containing Confidential Information, (iii) or

23 <sup>6</sup> Id. at ¶26(i).

24 <sup>7</sup> Id. at ¶26(l).

25 <sup>8</sup> See Docket, (Exh. A) (minors’ names redacted); Affidavit (Exh. B).

26 <sup>9</sup> See Order (Exh. C) (minors’ names redacted); Affidavit (Exh. B).

27 <sup>10</sup> See Affidavit (Exh. B).

28 <sup>11</sup> See Protective Order, pp. 2-3.

<sup>12</sup> Id. at 4.

1 information derived from confidential documents or deposition testimony, such  
2 papers, or the confidential portion thereof, shall be filed under seal. The Parties will  
3 comply with the Nevada Rules Governing Sealing and Redacting Court Records.<sup>13</sup>

4 Finally:

5 **17. The Parties acknowledge that DFS information and material, which are**  
6 **the subject of this Confidentiality Order, contain sensitive information**  
7 **that is generally protected from disclosure by Nevada Statute and**  
8 **Administrative Code, and that all such information should be and hereby**  
9 **is deemed confidential and may not be discussed with or disclosed, either**  
10 **orally or in writing, to anyone, including but not limited to the news or**  
11 **publication media in any format, except in the strict accordance with the**  
12 **provisions of this Confidentiality Order...**<sup>14</sup>

13 On 2/17/2022, at 2:55 p.m., Alex Falconi of Our Nevada Judges filed a Media Request  
14 Allowing Camera Access to Court Proceedings. On 2/17/2022, at 6:57 p.m., the Court entered  
15 an Order granting the Media Request. Defendants did not have adequate time and/or an  
16 opportunity to respond to the Media Request. Defendants and their Attorney do not consent to  
17 being recorded.<sup>15</sup>

18 **III. LEGAL STANDARD**

19 Pursuant to Supreme Court Rule (SCR) 230(2):

20 Under these rules, there is a presumption that all courtroom proceedings that are  
21 open to the public are subject to electronic coverage. A judge shall make  
22 particularized findings on the record when determining whether electronic  
23 coverage will be allowed at a proceeding, in whole or in part. Specifically, the  
24 judge shall consider the following factors:

- 25
- 26 (a) The impact of coverage upon the right of any party to a fair trial;
  - 27 (b) The impact of coverage upon the right of privacy of any party or witness;
- 28

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29 <sup>13</sup> Id. at 6.

30 <sup>14</sup> Id. (emphasis added).

31 <sup>15</sup> See Affidavit (Exh. B).

- 1 (c) The impact of coverage upon the safety and well-being of any party, witness or
- 2 juror;
- 3 (d) The likelihood that coverage would distract participants or would detract from
- 4 the dignity of the proceedings;
- 5 (e) The adequacy of the physical facilities of the court for coverage; and
- 6 (f) Any other factor affecting the fair administration of justice.

7 SCR 231. Revocation of Permission provides:

- 8 1. If any news reporter fails to comply with the conditions prescribed by the
- 9 judge, the judge may revoke that individual's permission to provide electronic
- 10 coverage of the proceeding.
- 11 2. This authorization may be revoked at any time without prior notice when, in
- 12 the judge's discretion, it appears that electronic coverage of the judicial proceedings
- 13 is interfering in any way with the proper administration of justice.
- 14 3. If permission is revoked, the judge shall make particularized findings on the
- 15 record.

16 SCR 240 Limitations provides:

- 17 1. Consent of participants. The consent of participants to coverage is not
- 18 required. The judge, however, in the exercise of sound discretion, may prohibit
- 19 the filming or photographing of any participant who does not consent to being
- 20 filmed or photographed. This is in recognition of the authority reposing in the
- 21 judge, upon the exercise of sound discretion, to hold certain judicial proceedings,
- 22 or portions thereof in camera and in recognition of the fact that certain
- 23 proceedings or portions thereof are made confidential by law. This provision does
- 24 not apply to jurors during the pendency of the proceeding as they are covered
- 25 elsewhere in these rules.

26 Nevada Rules Governing Sealing and Redacting Court Records Rule 3. Process and Grounds

27 for Sealing or Redacting Court Records provides:

- 28 1. Request to Seal or Redact Court Records; Service. Any person may request that
- the court seal or redact court records for a case that is subject to these rules by filing a
- written motion, or the court may, upon its own motion, initiate proceedings
- to seal or redact a court record...

1 4. Grounds to Seal or Redact; Written Findings Required. The court may order  
2 the court files and records, or any part thereof, in a civil action to  
3 be sealed or redacted, provided the court makes and enters written findings that  
4 the specific sealing or redaction is justified by identified compelling privacy or  
5 safety interests that outweigh the public interest in access to the court record. The  
6 parties' agreement alone does not constitute a sufficient basis for  
7 the court to seal or redact court records. The public interest in privacy or safety  
8 interests that outweigh the public interest in open court records include findings  
9 that:

10 (a) The sealing or redaction is permitted or required by federal or state law;

11 (b) The sealing or redaction furthers an order entered under NRCP 12(f) or  
12 JCRCP 12(f) or a protective order entered under NRCP 26(c) or JCRCP 26(c);

13 (c) The sealing or redaction furthers an order entered in accordance with federal  
14 or state laws that serve to protect the public health and safety;

15 (d) The redaction includes only restricted personal information contained in  
16 the court record...

17 (f) The sealing or redaction includes medical, mental health, or tax records...

18 (h) The sealing or redaction is justified or required by another identified  
19 compelling circumstance.

20 NRS 432B.280 provides:

21 1. Except as otherwise provided in NRS 239.0115, 432B.165, 432B.175 and  
22 439.538 and except as otherwise authorized or required pursuant to NRS  
23 432B.290, information maintained by an agency which provides child welfare  
24 services, including, without limitation, reports and investigations made pursuant  
25 to this chapter, is confidential.

26 Pursuant to EDCR 2.24(b), a party may seek reconsideration of a ruling of the court  
27 within 14 days after service of written notice of the order. "A district court may reconsider a  
28 previously decided issue if substantially different evidence is subsequently introduced or the  
decision is clearly erroneous." Masonry and Tile Contractors Ass'n of Southern Nevada, v.

1 Jolley, Urga & Wirth, Ltd., 113 Nev. 737, 741 (1997); Moore v. City of Las Vegas, 92 Nev.  
2 402, 405 (1976).

3 **The power of courts, state as well as federal, to delimit how parties may use**  
4 **information obtained through the court's power of compulsion is of long**  
5 **standing and well-accepted.** See, e.g., Degen v. United States, 517 U.S. 820,  
6 826...(1996) (noting that protective orders may be used “to prevent parties from  
7 using civil discovery to evade restrictions on discovery in criminal cases”); E.I.  
8 DuPont De Nemours Powder Co. v. Masland, 244 U.S. 100, 103...(1917) (“It will  
9 be understood that if, in the opinion of the trial judge, it is or should become  
10 necessary to reveal the secrets to others, it will rest in the judge's discretion to  
11 determine whether, to whom, and under what precautions, the revelation should  
12 be made.”); Brown Bag Software v. Symantec Corp., 960 F.2d 1465, 1469, 1471–  
13 72 (9th Cir.1992) (upholding a protective order that precluded plaintiff's in-house  
14 counsel from accessing defendant's trade secrets while providing the information  
15 to an independent consultant); Covey Oil Co. v. Cont'l Oil Co., 340 F.2d 993  
16 (10th Cir.1965) (upholding a protective order that restricted access to sensitive  
17 documents to counsel and independent certified public accountants and prohibited  
18 use of the materials for competitive purposes)...; Chem. & Indus. Corp. v.  
19 Druffel, 301 F.2d 126, 130 (6th Cir.1962) (noting that the district court may enter  
20 a protective order prohibiting public disclosure of information obtained through  
21 discovery); see also 8 Charles Alan Wright, Arthur R. Miller & Richard L.  
22 Marcus, Federal Practice and Procedure § 2043, at 566 (2d ed.1994) (listing  
23 examples of protective orders “limiting the persons who are to have access to the  
24 information disclosed and the use to which these persons may put the  
25 information”). **Courts could not function effectively in cases involving**  
26 **sensitive information—trade secrets, medical files and minors, among many**  
27 **others—if they lacked the power to limit the use parties could make of**  
28 **sensitive information obtained from the opposing party by invoking the**  
**court's authority.**

20 Bittaker v. Woodford, 331 F.3d 715, 726 (9th Cir. 2003) (emphasis added).

#### 21 **IV. LEGAL ARGUMENT**

22 This case involves four Minors all of whom are non-parties. Plaintiff recognizes their  
23 right to privacy and confidentiality and as is required by this Court, including by referring them  
24  
25  
26  
27  
28

1 as such and not using their names.<sup>16</sup> The Protective Order in this case confirms that and limits the  
2 disclosure of information and/or documents, **including “to the news or publication media in**  
3 **any format, except in the strict accordance with the provisions of this Confidentiality**  
4 **Order.”**<sup>17</sup>  
5

6 A large part of the information and documents in this case relate to nonparties – all four  
7 Minors who were part of the DFS investigation and findings, and Battistella (the Minors’  
8 mother) and her medical and psychological information and records. A large part of the  
9 underlying case entails DFS Records, which are confidential pursuant to NRS 432B.280, and  
10 HIPAA protected information – all of non-parties.<sup>18</sup> Defendants’ Document Disclosures 1 to 9  
11 and 11 to 15 are all DFS Records, which are confidential.<sup>19</sup> As such, Defendants request this  
12 Court reconsider and/or revoke its Order.  
13

14 While under the First Amendment the press has a presumed right of access to court  
15 proceedings and documents, the presumption can be overcome by an overriding right or  
16 interest based on findings that closure is essential to preserve higher values and is narrowly  
17 tailored to serve that interest. Press-Enterprise Co. v. Superior Court (Press-Enterprise I), 464  
18 U.S. 501, 510 (1984). The Court must make specific findings demonstrating that closure is  
19 essential to preserve higher values and is narrowly tailored to serve those values or that  
20  
21  
22  
23  
24

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25 <sup>16</sup> See FAC, Caption and pp. 1, 2, 5 and 12.

26 <sup>17</sup> See Protective Order, p. 6 (emphasis added).

27 <sup>18</sup> See Affidavit (Exh. B); Defendants’ Third Supplemental Disclosure (Exh. D) (minors’  
names redacted).

28 <sup>19</sup> Id.



1 interest. Id.; Press-Enterprise Co. v. Superior Court (Press-Enterprise II), 478 U.S. 1, 13–14  
2 (1986).

3 Here, the Order was entered 4 hours and two minutes after the Request was filed  
4 without allowing Defendants adequate time and/or an opportunity to respond to the Media  
5 Request and without any evidence as to the case particulars. Respectfully, there is relevant  
6 evidence for this Court to consider and, without that, the Court’s decision is clearly erroneous.  
7 Defendants do not blame this Court as it could not know, at this early stage in the case being  
8 returned from Nevada Supreme Court and not having been on the case prior to that time, that  
9 the vast majority of the information and documents in this case relate to non-party Minors and  
10 others, confidential DFS Records, and Battistella’s medical and psychological records. As  
11 such, there are Statutes and a Protective Order there are higher values that need to be  
12 considered here and establishing that closure is essential and is narrowly tailored to serve those  
13 values or that interest. Press-Enterprise I and II, supra. Based on the foregoing, Defendants  
14 respectfully request this Court grant their Motion to Reconsider and/or Revoke Order Granting  
15 Media Request Allowing Camera Access To Court Proceedings.  
16  
17  
18

19 DATED this 23<sup>rd</sup> day of February, 2022.

20  
21 OLSON CANNON GORMLEY & STOBERSKI

22 /s/ Felicia Galati

23 \_\_\_\_\_  
24 FELICIA GALATI, ESQ.  
25 Nevada Bar No. 007341  
26 9950 West Cheyenne Avenue  
27 Las Vegas, Nevada 89129  
28 Attorneys for Defendants  
CLARK COUNTY and  
GEORGINA STUART

1 **CERTIFICATE OF SERVICE**

2 **I HEREBY CERTIFY** that on the 23<sup>rd</sup> day of February, 2022, the undersigned, an  
3 employee of OLSON CANNON GORMLEY & STOBERSKI, hereby served a true copy of  
4 **MOTION TO RECONSIDER AND/OR REVOKE ORDER GRANTING MEDIA**  
5 **REQUEST ALLOWING CAMERA ACCESS TO COURT PROCEEDINGS** to the parties  
6 listed below via the EFP Program, pursuant to the Court’s Electronic Filing Service Order  
7 (Administrative Order 14-2) effective June 1, 2014, via U.S. Mail and via e-mail:

8  
9 Paola M. Armeni, Esq.  
10 Nadia J. Ahmed, Esq.  
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23 */s/Karla Livingston*  
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# EXHIBIT A



Clerk of the Circuit Court  
Andrea Lynn Chasteen

Parties

Offenses

Financials

Schedule

Events

Search End

<b>Case:</b> 2015P 000231	<b>Status:</b> Open Case	<b>Opened:</b> 03/30/2015
<b>Title:</b> IN THE MATTER OF THE ESTATE OF vs. ██████████ EGGLESTON		
<b>Type:</b> PROBATE	<b>File Type:</b> Guardianship Less than \$15,000.00	<b>Closed:</b> N/A

Event Date	Docket Entry
11/17/2021	<b>PROOF OF SERVICE/CERTIFICATE OF SERVICE</b>
11/17/2021	<b>NOTICE OF FILING</b>
11/16/2021	<b>ORDER</b>
11/16/2021	<b>PC - Petition</b> Matter is called for status on visitation. Attorney Katherine Maloney present on behalf of the Guardian. Attorney Todd Scalzo present on behalf of the Father. Attorney Jennifer Lynch present as Guardian Ad Litem. Matter is continued for the same. Order to be filed electronically.
11/10/2021	<b>Faxed receipts (X3)</b>
11/10/2021	<b>Order</b>
11/10/2021	<b>Copy of Minute Entry / Court Order</b> Copy of minute entry and / or court order sent to Attorney Scalzo per Judges' order.
11/10/2021	<b>Copy of Minute Entry/Court Order</b> Copy of minute entry and / or court order sent to Attorney Lynch per Judges' order.
11/10/2021	<b>Copy of Minute Entry / Court Order</b> Copy of minute entry and / or court order sent to Attorney Maloney per Judges' order.
11/10/2021	<b>Case Not On Call</b>
11/10/2021	<b>PC - Petition</b> NOT ON CALL - On the motion of the Court this matter comes on for decision. It is ordered that the Guardian's petition for Attorney fees and costs is granted in part and denied in part. The Guardian's petition for fees incurred due to rule issued is

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Clerk of the Circuit Court  
Andrea Lynn Chasteen

Parties	Offenses	Financials	Schedule	Events	Search End
					Kathleen Rock are present on behalf of the Guardian. Attorney, Todd Scalzo is present on behalf of the biological father. Attorney, Jennifer Lynch is present as Guardian Ad Litem. Pretrial held. Arguments heard. Court takes the matter under advisement. Case is continued for status on visitation (via Zoom). Order to be submitted electronically.
09/14/2021					<b>REPLY TO RESPONSE TO COUNTER-PETITION</b>
09/14/2021					<b>NOTICE OF FILING</b>
08/24/2021					<b>PC - Petition</b> Matter is called for status on counseling and status on setting a hearing date for the petition for fees. Attorney Katherine Maloney present. Attorney Todd Scalzo present. Attorney Jennifer Lynch present as Guardian Ad Litem. Matter is continued for status on counseling and hearing on the petition for fees.
08/24/2021					<b>Order</b>
07/21/2021					<b>NOTICE OF FILING FILED FOR STEVEN EGGLESTON</b>
07/21/2021					<b>RESPONSE AND COUNTER PETITION FOR FEES FILED FOR STEVEN EGGLESTON</b>
07/13/2021					<b>ORDER</b>
07/13/2021					<b>PC - Petition</b> Matter is called for status on counseling. Guardian is present and by Attorney Katherine Maloney. Attorney Todd Scalzo present on behalf of the Father. Attorney Jennifer Lynch present as Guardian Ad Litem. Matter is continued for the same. Order is to be submitted electronically.
06/22/2021					<b>PROOF OF SERVICE/CERTIFICATE OF SERVICE</b>
06/22/2021					<b>NOTICE OF FILING</b>
06/18/2021					<b>PROOF OF SERVICE/CERTIFICATE OF SERVICE</b>
06/16/2021					<b>PETITION FOR ATTORNEY FEES</b>
06/16/2021					<b>NOTICE OF MOTION</b>
06/09/2021					<b>ORDER</b>
06/09/2021					<b>PC - Petition</b> Matter comes on for status on counseling and visitation and presentation of the annual report. Attorney, Katherine Maloney is present on behalf of the Guardian. Attorney, Jennifer Lynch is

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**Clerk of the Circuit Court**  
**Andrea Lynn Chasteen**

Parties	Offenses	Financials	Schedule	Events	Search End
				to compel, petition for contempt and a motion to reallocate Guardian's attorney fees. Guardian present and by Attorney Katherine Maloney and Attorney Kathleen Rock. Father present and by Attorney Todd Scalzo. Attorney Jennifer Lynch present as Guardian Ad Litem. A supervised visitation schedule with counseling is set. See order for all details. Child support is set in the amount of \$1,450.00 a month plus \$200.00 per month as to arrears. Motion to compel is denied as mute. Petition for contempt is denied as mute. The motion to reallocate Guardian attorney fees is denied. Attorney Ms. Maloney is granted leave to file a petition for fees. Matter is continued for status as to counseling/visitation. Order is to be submitted electronically.	
				<b>ORDER</b>	
				<b>PC - Petition</b> Cause comes on emergency motion to continue hearing date. Attorney Katherine Maloney present on behalf of the Guardian. Attorney Jennifer Lynch present as Guardian Ad Litem. Motion is granted. Hearing is reset. Date of 4/21/21 is stricken. Order is to be submitted electronically.	
				<b>MOTION TO CONTINUE OR EXTEND TIME</b>	
				<b>NOTICE OF MOTION /EMERGENCY</b>	
				<b>ORDER</b>	
				<b>PC - Petition</b> Matter is called for status on discovery and hearing date. Attorney Katherine Maloney present on behalf of the Guardian. Attorney Todd Scalzo present on behalf of the Father. Attorney Jennifer Lynch present as Guardian Ad Litem. By agreement the 4/21/21 date is to stand. Order is to be submitted electronically.	
				<b>PROOF OF SERVICE/CERTIFICATE OF SERVICE</b>	
				<b>Order - GAL FEES</b>	
				<b>Order - CHILD SUPPORT</b>	
				<b>Matter set for</b>	
				<b>PC - Petition</b> Matter is called for status/hearing on child support. Guardian present and by Attorney Katherine Maloney. Attorney Todd Scalzo present on behalf of the Father. Attorney Jennifer Lynch present as Guardian Ad Litem. Argument is heard. It is ordered that temporary	

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Clerk of the Circuit Court  
Andrea Lynn Chasteen

Parties	Offenses	Financials	Schedule	Events	Search End
					Matter comes on for Hearing on the motions to compel, objections and rule. Attorney, Katherine Maloney is present on behalf of the Guardian. Attorney, Todd Scalzo is present on behalf of father. Attorney, Jennifer Lynch is present as Guardian Ad Litem. Arguments heard. Attorney Maloney's objection to request for production is sustained. Motion to compel; ruling is reserved. Motion for GAL fees is continued. Motion to reconsider 12/13/19 order filed on 1/2/20 is entered and continued. Case is continued for status on child support calculations and setting for Hearing on pending motions. Order to be submitted electronically.
02/08/2021					<b>PETITION FOR ATTORNEYS FEES</b>
02/08/2021					<b>NOTICE OF FILING</b>
02/05/2021					<b>SUPPLEMENTAL</b>
02/05/2021					<b>NOTICE OF FILING</b>
01/28/2021					<b>EXHIBIT(S)</b>
01/28/2021					<b>AMENDED FILING NOTICE OF FILING</b>
01/28/2021					<b>EXHIBIT(S)</b>
01/28/2021					<b>REPLY TO RESPONSE TO EMERGENCY MOTION TO COMPEL</b>
01/28/2021					<b>NOTICE OF FILING</b>
01/14/2021					<b>ORDER</b>
01/14/2021					<b>PC - Petition</b> Matter is called for status on all pending matters. Guardian is present and by Attorney Katherine Maloney. Attorney Todd Scalzo present on behalf of Father. Attorney Jennifer Lynch present as Guardian Ad Litem. Matter is set for hearing on the motions to compel and any objections. Order is to be submitted electronically.
12/24/2020					<b>PROOF OF SERVICE/CERTIFICATE OF SERVICE</b>
12/24/2020					<b>RESPONSE</b>
12/04/2020					<b>Order</b>
12/04/2020					<b>PC - Petition</b> Matter comes on for status. Attorney, Katherine Maloney is present on behalf of the Guardian. Attorney, Todd Scalzo is present on behalf of father. Attorney, Jennifer Lynch is present as Guardian Ad Litem. Case is continued for status on all pending matters.

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Clerk of the Circuit Court  
Andrea Lynn Chasteen

Parties	Offenses	Financials	Schedule	Events	Search End
11/12/2020				<b>NOTICE OF FILING</b>	
11/12/2020				<b>REPLY IN SUPPORT OF MOTION TO MODIFY</b>	
10/28/2020				<b>Proof of Service/Certificate of Service</b>	
10/28/2020				<b>Response</b>	
10/27/2020				<b>Response</b>	
10/27/2020				<b>Notice OF FILING</b>	
09/30/2020				<b>PC - Petition</b> Matter is called for status. Attorney Katherine Maloney present on behalf of the Guardian. Attorney Todd Scalzo present on behalf of the Father. Attorney Jennifer Lynch present as Guardian Ad Litem. Responsive pleading schedule is set. Matter is continued for the same. Order is to be submitted electronically.	
09/30/2020				<b>Order</b>	
09/25/2020				<b>Notice OF FILING</b>	
09/25/2020				<b>Motion to Modify</b>	
09/25/2020				<b>Proof of Service/Certificate of Service</b>	
09/24/2020				<b>Objection</b>	
09/24/2020				<b>Notice OF FILING</b>	
09/18/2020				<b>Proof of Service/Certificate of Service</b>	
08/31/2020				<b>Order</b>	
08/31/2020				<b>Proof of Service/Certificate of Service</b>	
08/31/2020				<b>PC - Petition</b> Matter is called for a motion to compel discovery and a motion to withdraw as counsel. Attorney Katherine Maloney present. Attorney Todd Scalzo present on behalf of Mr. Eggleston. Attorney Jennifer Lynch present as Guardian Ad Litem. Attorney Mr. Zahour's motion to withdraw is granted. The motion to compel discovery is continued for status. Hearing date is stricken. Order to be filed electronically.	
08/27/2020				<b>Proof of Service/Certificate of Service OF FILING</b>	
08/27/2020				<b>Appearance (No Fee Previously Paid on Behalf of Other Party) FOR STEVE</b>	
07/23/2020				<b>Motion TO WITHDRAW</b>	

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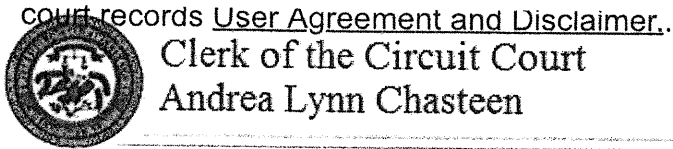


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Clerk of the Circuit Court  
Andrea Lynn Chasteen

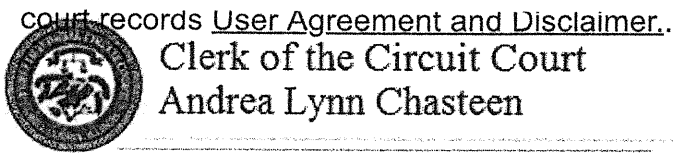
Parties	Offenses	Financials	Schedule	Events	Search End
06/11/2020	<b>Order</b>				
06/11/2020	<b>Motion TO COMPEL DISCOVERY</b>				
06/10/2020	<b>Report</b>				
06/10/2020	<b>PC - Petition</b> Matter is called for status on discovery. Guardian is present and by Attorney Katherine Maloney. Attorney Alonzo Zahour present on behalf of Father. Attorney Jennifer Lynch present as Guardian Ad Litem. Attorney Ms. Maloney makes a motion to issue a rule to show cause against the Father. Attorney Mr. Zahour accepts the rule to show cause. Annual report is approved. It is ordered that the Father is not to e-mail Attorney Ms. Maloney. Matter is continued to the hearing date. Order to be filed electronically.				
06/03/2020	<b>REMOTE APPEARANCES IN CIVIL MATTER</b> Notice is mailed pursuant to A.O. 2020-20 regarding REMOTE APPEARANCES IN CIVIL MATTERS, authorizing modifications to Court proceedings and protocols in light of the COVID-19 health emergency.				
06/03/2020	<b>REMOTE APPEARANCES IN CIVIL MATTER</b> Notice is mailed pursuant to A.O. 2020-20 regarding REMOTE APPEARANCES IN CIVIL MATTERS, authorizing modifications to Court proceedings and protocols in light of the COVID-19 health emergency.				
03/26/2020	<b>Proof of Service/Certificate of Service</b>				
03/26/2020	<b>Notice OF FILING</b>				
03/17/2020	<b>Order</b>				
03/17/2020	<b>Matter set for</b>				
03/17/2020	<b>PC - Petition</b> NOT ON CALL - Attorney Katherine Maloney is present on behalf of the Guardian. By agreement matter is set for status on discovery on 6/10/20. Matter is reset for hearing on 9/30/20. Date of 3/19/20 is stricken. ** NO FILE **				
03/17/2020	<b>Case Not On Call</b>				
03/10/2020	<b>Petition for Rule to Show Cause</b>				
03/10/2020	<b>Notice of Motion</b>				
02/19/2020	<b>Reply TO ANSWER TO PETITION FOR CHILD SUPPORT</b>				
02/19/2020	<b>Notice OF FILING</b>				

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Parties	Offenses	Financials	Schedule	Events	Search End
					Lynch is present as Guardian Ad Litem. Petition is set for hearing. Father is ordered to be present.
01/22/2020					<b>Response</b>
01/22/2020					<b>Notice OF FILING</b>
01/02/2020					<b>Exhibit(s)</b>
01/02/2020					<b>Motion</b>
12/23/2019					<b>Proof of Service/Certificate of Service</b>
12/23/2019					<b>Notice OF FILING</b>
12/18/2019					<b>Petition FOR CHILD SUPPORT</b>
12/18/2019					<b>Notice of Motion</b>
12/03/2019					<b>See Order Signed</b>
12/03/2019					<b>PC - Petition</b> Matter is called for hearing on the Guardian's motion to dismiss Father's petition for visitation, Guardian's petition for fees against the Father, Guardian's motion to strike Father's response to the motion to dismiss. Guardian is present and by Attorney Katherine Maloney. Attorney Alonzo Zahour present on behalf of Father. Pre trial is held and concluded. It is ordered : 1) Guardian's petition for contribution to fees is granted. 2) Father's response is stricken without prejudice. 3) Guardian's motion to dismiss Father's motion for parenting time is granted without prejudice. 4) Diane Wybourn is appointed as Supervised Parenting Coordinator, costs shall be paid 100% by the Father and must be present in person for the visitation. 5) Father must pay for any fees of the Guardian Ad Litem. 6) Father must pay for the Guardian Ad Litem retainer. 7) Father is to pay for any Therapist that the children have for helping them through the reunification. 8) The request for impounded documents from the Vegas proceedings or Illinois proceedings is denied. See order for any details. Matter is continued for status on the filing and approval of the annual report.
12/02/2019					<b>Motion TO STRIKE PLEADINGS</b>
12/02/2019					<b>Notice of Motion</b>
12/02/2019					<b>Response</b>
09/25/2019					<b>See Order Sianed</b>

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Parties	Offenses	Financials	Schedule	Events	Search End
09/24/2019	<b>Motion FOR CONTINUANCE</b>				
08/02/2019	<b>See Order Signed</b>				
08/02/2019	<b>PC - Petition</b> Matter is called for status and a motion for fees, motion to dismiss and a motion for visitation. Attorney Katherine Maloney present on behalf the Guardian. Attorney Alonzo Zahour present on behalf of father. Attorney Jennifer Lynch present as Guardian Ad Litem. All matters are set for hearing.				
07/23/2019	<b>Motion TO DISMISS</b>				
07/23/2019	<b>Notice of Motion</b>				
07/05/2019	<b>Response</b>				
05/29/2019	<b>PC - Petition</b> Cause comes on petition for attorney fees and costs pursuant to court order and a petition for visitation. Attorney Katherine Maloney present on behalf of the Guardian. Attorney Alonzo Zahour present on behalf of the father. Attorney Jennifer Lynch present as Guardian Ad Litem. Interim Guardian Ad Litem fees are ordered in the amount of \$5,000.00 and are to be paid by Father. Matter is continued for further status on the pending petitions.				
05/29/2019	<b>See Order Signed</b>				
05/23/2019	<b>Petition</b>				
05/23/2019	<b>Notice (with court appearance date)</b>				
05/22/2019	<b>See Order Signed</b>				
05/22/2019	<b>Case Not On Call</b>				
05/22/2019	<b>PC - Petition</b> NOT ON CALL - Attorney Katherine Maloney present on behalf of the Guardian. Motion to strike the date of 5/28/19. Motion is granted. Date of 5/29/19 is to stand. ** NO FILE **				
05/07/2019	<b>Notice (with court appearance date)</b>				
05/07/2019	<b>Motion</b>				
04/10/2019	<b>See Order Signed</b>				
04/10/2019	<b>PC - Petition</b> Matter is called for status on the motion to terminate and the				

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Clerk of the Circuit Court  
Andrea Lynn Chasteen

Parties

Offenses

Financials

Schedule

Events

Search End

	NOT ON CALL - Attorney Katherine Maloney is present. Due to inclement weather this matter is rescheduled. Date of 1/30/19 is stricken.
01/29/2019	<b>Case Not On Call</b>
12/03/2018	<b>See Order Signed</b>
12/03/2018	<b>PC - Petition</b> Matter is called for status on the motion to terminate and a motion to strike and dismiss. Attorney Katherine Maloney present on behalf of the Guardian. Attorney Alonzo Zahour present on behalf of the father. Attorney Jennifer Lynch present as Guardian Ad Litem. Matter is continued for the same.
10/16/2018	<b>Motion</b>
10/16/2018	<b>Notice (with court appearance date)</b>
09/25/2018	<b>Proof OF SERVICE</b>
09/25/2018	<b>Notice (without court appearance date)</b>
09/25/2018	<b>PC - Petition</b> Matter is called for status on the motion to terminate guardianship. Attorney Alonzo Zahour present on behalf of Father. Attorney Katie Rock present on behalf of the Guardian. Attorney Jennifer Lynch present as Guardian Ad Litem. Matter is continued for the same.
09/25/2018	<b>Agreed Order</b>
07/23/2018	<b>See Order Signed</b>
07/23/2018	<b>PC - Petition</b> Matter is called for status on the motion to terminate guardianship. Attorney Meghan Preston present on behalf of the Guardian. Attorney Jennifer Lynch present as Guardian Ad Litem. Matter is continued for the same.
07/20/2018	<b>Appearance FILED FOR STEVE EGGLESTON</b>
07/20/2018	<b>Appearance/Answer (PROBATE)</b>
06/28/2018	<b>Appearance</b>
06/28/2018	<b>Notice (without court appearance date)</b>
05/22/2018	<b>Report (X2)</b>

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Parties	Offenses	Financials	Schedule	Events	Search End
					guardianship. Third Annual Report presented and approved. Matter is set for the filing and approval of the 4th Annual Report on 5/28/19. Motion to terminate guardianship is continued for status on 7/23/18.
05/11/2018					<b>Impounded Document APPEARANCE MEMORANDUM NOTICE OF OBJECTI... RELATED CASES AND PETITION FILED BY STEVE EGGLESTON</b>
05/11/2018					<b>Appearance/Answer (PROBATE)</b>
05/23/2017					<b>Annual Report Filed by Lisa Callahan (██████)</b>
05/23/2017					<b>Annual Report Filed by Lisa Callahan (██████)</b>
05/23/2017					<b>Supporting Document(s)/Exhibit(s)</b>
05/23/2017					<b>Affidavit of Jennifer M. Lynch</b>
05/23/2017					<b>Petition for Attorney's Fees</b>
05/23/2017					<b>See Order Signed</b>
05/23/2017					<b>See Order Signed</b>
05/23/2017					<b>See Order Signed - copy (original 15P230)</b>
05/23/2017					<b>PC - Annual Report</b> Guardian is present. Attorney Jennifer Lynch present as Guardian Ad Litem. Matter Comes on for presentation of Annual Report. Second Annual Report presented and approved. Petition for Guardian Ad Litem fees and The County of Will shall pay (petition and order copied and sent to Chief Judge). Matter is set for the filing and approval of the 3rd Annual Report.
05/24/2016					<b>Annual Report Filed - ██████</b>
05/24/2016					<b>Annual Report Filed - ██████</b>
05/24/2016					<b>See Order Signed - COPY (orig filed in 15 P 230)</b>
05/24/2016					<b>PC - Annual Report</b> Guardian is present. Annual Report presented and approved. Matter is set for the filing and approval of the 2nd Annual Report.
09/21/2015					<b>PC - Petition</b> Matter comes on for status on GAL report. Attorney, Sherese Shabazz is present on behalf of the Petitioner. Attorney, Jennifer Lynch is present as GAL. Court being fully advised, plenary guardianship with prejudice is entered. The Court further orders that the Minors may not be removed from the jurisdiction of the Court / State of

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**Clerk of the Circuit Court**  
**Andrea Lynn Chasteen**

Parties	Offenses	Financials	Schedule	Events	Search End
					Guardianship is to remain in full force and effect. This matter is for further status as to the filing of the GAL's report.
07/29/2015					<b>See Order Signed</b>
07/13/2015					<b>See Order Signed</b>
07/13/2015					<b>PC - Petition</b> Matter is called for status. Attorney Jennifer Lynch is present. Hearing date of 7/29/15 at 1:30 p.m. is stricken. Matter is continued for status on the GAL report and status on new counsel for father. Judge has file. <b>** NO FILE THIS DATE **</b>
07/10/2015					<b>PC - Petition</b> NOT ON CALL - Attorney Jennifer Lynch is present as GAL and makes an emergency oral motion not to have the children be removed from this Court's jurisdiction without specific order of this court. Emergency oral motion is granted. The minor children shall remain in the sole custody of the Guardian, Lisa Callahan. Date of 7/13/15 to stand. <b>** NO FILE THIS DATE **</b>
07/10/2015					<b>See Order Signed</b>
06/30/2015					<b>Judge has File</b>
06/30/2015					<b>PC - Petition</b> Cause comes on emergency petition to withdraw as counsel. Petitioner, Attorney Nida Abbosi, present. Attorney Jennifer Lynch is present as GAL. Petition is granted. Father of the minors is given 21 days to file his pro se appearance. Date of 7/13/15 is to stand.
06/30/2015					<b>Copy of Court Minutes from Clark County, Nevada</b>
06/30/2015					<b>See Order Signed</b>
06/22/2015					<b>Judge has File</b>
06/22/2015					<b>Emergency Motion TO WITHDRAW FILED BY EMILY R SMITH</b>
06/22/2015					<b>Emergency Notice FILED BY EMILY R SMITH</b>
06/08/2015					<b>Judge returns file</b>
06/08/2015					<b>Impounded Document- Report of GAL and Documents from Clark County</b>
06/08/2015					<b>Letters Issued for [REDACTED]</b>
06/08/2015					<b>Letters Issued for [REDACTED]</b>

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Clerk of the Circuit Court  
Andrea Lynn Chasteen

Parties	Offenses	Financials	Schedule	Events	Search End
					enters an order for new letters of office as plenary guardian without prejudice.
06/02/2015					<b>Appearance AND ANSWER</b>
06/02/2015					<b>Notice of Filing</b>
05/28/2015					<b>Impounded Document - Judge's notes</b>
05/28/2015					<b>PC - Petition</b> NOT ON CALL - Judge Allen has a telephone conference with Judge Potter from Clark County, Nevada about this case and related case in Nevada. See Judge's impounded notes. Judge Allen to relay information to Attorney Jennifer Lynch and Attorney Sherese Shabazz. Judge Allen will update Judge Potter after the 6/8/15 court hearing.
05/27/2015					<b>Judge has File</b>
05/26/2015					<b>IMPOUND DOCUMENT - Verified Statement in Support of Petition</b>
05/26/2015					<b>Letters Issued for [REDACTED] (temporary)</b>
05/26/2015					<b>Letters Issued for [REDACTED] (temporary)</b>
05/26/2015					<b>Motion to dismiss for lack of jurisdiction and for lack of Plaintiff's legal capacity (unsigned) Filed by Attorney Smith and Attorney Abassi</b>
05/26/2015					<b>Notice of motion Filed by Attorney Smith and Attorney Abbasi</b>
05/26/2015					<b>Nomination and consent of guardianship (X2)</b>
05/26/2015					<b>Acceptance of office of guardian of person of minor</b>
05/26/2015					<b>Oath and Bond Approved - no surety (X2)</b>
05/26/2015					<b>See Order Signed</b>
05/26/2015					<b>Order appointing temporary guardian of minor</b>
05/26/2015					<b>PC - Guardian of Minor Person</b> Cause comes on for Petition for Guardian of the Minors. Petitioner(s) present and by Attorney Sherese Shabazz. The Minors are present. Father is present and by Attorney Emily Smith and Attorney Nida Abbasi. Court appoints Attorney Jennifer Lynch as GAL. Attorney Lynch is present and accepts the appointment instanter. Father objects to the petition. A written consent is filed for the mother. Attorney Smith and Attorney Abbasi are given leave to file a motion to dismiss in open court. It is agreed that Judge Allen and Judge Potter from Clark County, Nevada will

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**Clerk of the Circuit Court**  
**Andrea Lynn Chasteen**

Parties	Offenses	Financials	Schedule	Events	Search End
05/26/2015	<b>Appearance Filed For STEVEN EGGLESTON FILED BY EMILY R SMITH</b>				
05/26/2015	<b>Appearance Probate</b>				
05/26/2015	<b>Juvenile Probation Service</b>				
05/26/2015	<b>Juvenile Probation Service</b>				
05/22/2015	<b>Exhibit(s)</b>				
05/22/2015	<b>OBJECTION TO GUARDIANSHIP AND HEARING FILED BY STEVEN EGGLES...</b>				
03/30/2015	<b>Impounded Document</b>				
03/30/2015	<b>APPLICATION TO WAIVE FEES FOR SPECIAL NEEDS GUARDIANSHIP</b>				
03/30/2015	<b>Summons Issued (Copy(s)filed) 2 ORIGINALS</b>				
03/30/2015	<b>Petition</b>				
03/30/2015	<b>Guardianship Less than \$15,000.00</b>				

### Informational Message

#### Site Availability:

- This site is unavailable Monday through Saturday from 11:50 pm CST until 3:00 am CST the next morning, and Sunday from 11:50 pm CST until Monday morning at 5:00 am CST.

#### Important Covid-19 Related Updates:

- [AO 21-30 Misdemeanor and Traffic Zoom Protocols](#)
- [AO 21-36 Civil Zoom Protocols and Instructions \(If Ordered\)](#)
- [AO 21-38 Domestic Relations Court Zoom Protocols](#)
- [Family Judge Zoom Instructions](#)



# EXHIBIT B

Law Offices of  
**OLSON CANNON GORMLEY & STOBERSKI**  
A Professional Corporation  
9950 West Cheyenne Avenue  
Las Vegas, Nevada 89129  
(702) 384-4012 Fax (702) 383-0701

**AFFIDAVIT OF FELICIA GALATI**

1  
2 STATE OF NEVADA            )  
3    )        ss:  
4 COUNTY OF CLARK            )

5            FELICIA GALATI, being first duly sworn, deposes and states:

6            1.        That your Affiant is a shareholder of the law firm Olson Cannon Gormley &  
7 Stoberski and is duly licensed to practice law before all of the Courts in the State of Nevada.

8            2.        That your Affiant is one of the attorneys assigned by the law firm to represent the  
9 interests of Defendants Clark County and Georgina Stuart in Eggleston v. Clark County, Case  
10 No. A-16-748919-C. That Affiant has personal knowledge concerning the facts and  
11 circumstances surrounding the matters addressed herein and makes this Affidavit based on that  
12 knowledge.

13            3.        That your Affiant makes this Affidavit in support of Defendants’ Motion To  
14 Reconsider And/Or Revoke Order Granting Media Request Allowing Camera Access To Court  
15 Proceedings (“Motion”).  
16

17            4.        On 3/30/15, Defendant Lisa Callahan filed a Guardianship Action regarding the  
18 Minors in the Will County Circuit Court, Joliet, Illinois, which remains pending. Attached to  
19 Defendants’ Motion as Exhibit A is a is a true and correct copy of the Docket for that case  
20 previously obtained.  
21

22            5.        On 7/10/15, the Illinois Court, after speaking with Eighth Judicial District Court Judge  
23 William Potter, entered an Order establishing it has sole and exclusive jurisdiction over the minor  
24 children; that the minor children shall not be removed from the Court's jurisdiction without  
25 specific Order of this Court; and the minor children shall remain in the sole physical custody of  
26  
27  
28

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A Professional Corporation  
9950 West Cheyenne Avenue  
Las Vegas, Nevada 89129  
(702) 384-4012 Fax (702) 383-0701

1 the guardian, Lisa Callahan. Attached to Defendants' Motion as Exhibit C is a true and  
2 correct copy of the above Order. The Illinois Action remains pending.

3 6. Defendants did not have adequate time and/or an opportunity to respond to the  
4 Media Request in the four hours and two minutes before the related Order was entered.  
5 Defendants and their Attorney do not consent to being recorded.  
6

7 7. A large part of the information and documents in this case relate to nonparties –  
8 all four Minors who were part of the DFS investigation and findings, and Battistella (the  
9 Minors' mother) and her medical and psychological information and records. A large part of  
10 the underlying case entails DFS Records, which are confidential pursuant to NRS 432B.280  
11 and HIPAA protected information, all relate to non-parties. Attached to Defendants' Motion as  
12 Exhibit D is a true and correct copy of Defendants Third Supplemental Disclosure listing  
13 various DFS Records, i.e., 1 to 9 and 11 to 15, which are confidential.  
14

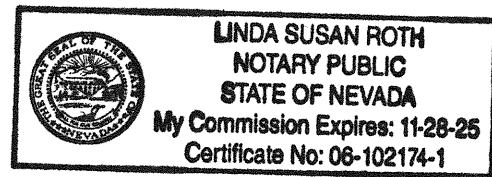
15 8. Affiant hereby attests that the foregoing information is true and accurate to the  
16 best of her knowledge as of the date of his signature hereon.  
17

*F Galati*

FELICIA GALATI

18  
19  
20 SUBSCRIBED AND SWORN to before  
21 me this 23rd day of February, 2022.

22  
23 *Linda Susan Roth*  
24 NOTARY PUBLIC in and for said  
25 County and State  
26  
27  
28



# EXHIBIT C

STATE OF ILLINOIS )  
 )  
COUNTY OF WILL ) SS.

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT,  
WILL COUNTY, ILLINOIS

IN RE THE ESTATE OF )  
 )  
██████████ EGGLESTON and )  
██████████ EGGLESTON, ) NO. 15 P 231  
 )  
Minors. )

15 JUL 10 AM 10:57  
FILED  
JUVENILE CENTER  
CIRCUIT CLERK  
WILL COUNTY, ILLINOIS

ORDER

This matter coming before this court on the Emergency Oral Motion of the Guardian ad Litem, the court waiving notice herein, the court having reviewed the Order of Custody and minutes entered in Case no. D508989 in the Eighth Judicial District Court, Clark County, Nevada, and being advised by the guardian ad litem, Jennifer M. Lynch, that a dispute now exists between the guardian, Lisa Callahan, and the minors' natural father, Steven Eggleston, as to the immediate implications of such Order and minutes and the Orders entered in this court, the court having conducted a judicial conference as required under 750 ILCS 36/204(d), this court finding that there is no objection to this court's exclusive and continuing sole jurisdiction over the minor children from presiding Judge Potter in Case no. D508989 in the Eighth Judicial District Court, Clark County, Nevada, this court finds as follows:

- A. This court has sole and exclusive jurisdiction over the minor children, ██████████ and ██████████ under the 750 ILCS 36/202-204, the Uniform Child-Custody Jurisdiction and Enforcement Act;
- B. No other court has the authority to enter any Order affecting the physical custody of the minor children herein;
- C. That the continuing jurisdiction of this court is necessary to protect the minor children from mistreatment and threats of mistreatment and abuse;

This Court further Orders as follows:

- 1. The minor children herein shall not be removed from this court's jurisdiction without specific Order of this court;
- 2. The minor children shall remain in the sole physical custody of the guardian herein, Lisa Callahan;
- 3. The guardian ad litem shall receive five (5) certified copies of this order and shall provide the best notice of entry of this Order to the parties herein;
- 4. Status date of July 13, 2015 at 9:00a.m. shall stand.

ENTER: 7/10/15

JUDGE

Jennifer M. Lynch  
JUNE, PRODEHL, RENZI & LYNCH L.L.C.  
1861 Black Road  
Joliet, Illinois 60435  
(815) 725-8000  
Atty. No. 06275404

CERTIFICATION

I, PAMELA J. MCGUIRE, CLERK OF  
THE 12TH JUDICIAL CIRCUIT, WILL  
COUNTY, ILLINOIS, CERTIFY THIS  
TO BE A TRUE COPY OF AN  
ORIGINAL RECORD OF THIS CIRCUIT  
COURT.

SIGNED



DATE

EGGLESTON\_000802

# EXHIBIT D

*Law Office of*  
**OLSON, CANNON, GORMLEY, ANGULO & STOBERSKI**  
*A Professional Corporation*  
9950 West Cheyenne Avenue  
Las Vegas, Nevada 8912  
(702) 384-4012 Telecopier (702) 383-0791

1 FELICIA GALATI, ESQ.  
Nevada Bar No. 007341  
2 OLSON, CANNON, GORMLEY  
ANGULO & STOBERSKI  
3 9950 West Cheyenne Avenue  
4 Las Vegas, NV 89129  
5 Phone: 702-384-4012  
6 Fax: 702-383-0701  
[fgalati@ocgas.com](mailto:fgalati@ocgas.com)

7 Attorneys for Defendants  
CLARK COUNTY and GEORGINA STUART

8  
9 DISTRICT COURT

10 CLARK COUNTY, NEVADA

11  
12 STEVE EGGLESTON,

13  
14 Plaintiff,

15 v.

16 GEORGINA STUART; CLARK COUNTY,  
17 NEVADA; LISA CALLAHAN; BRIAN  
18 CALLAHAN; AND DOES I THROUGH 100,  
19 INCLUSIVE,

20  
21 Defendants.

CASE NO. A-16-748919-C  
DEPT. NO. VIII

**DEFENDANTS' GEORGINA STUART  
AND CLARK COUNTY THIRD  
SUPPLEMENTAL DISCLOSURE  
STATEMENT PURSUANT TO N.R.C.P.  
16.1**

22 COME NOW Defendants GEORGINA STUART and CLARK COUNTY, by and  
23 through their attorneys, FELICIA GALATI, ESQ., of the law firm of OLSON, CANNON,  
24 GORMLEY, ANGULO & STOBERSKI, and pursuant to Nevada Rule of Civil Procedures  
25 16.1 hereby submits the following supplement to their list of documents and witnesses  
26 **(new information in bold):**

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DOCUMENTS

1. UNITY Case Notes Case: 1362581, start date December 23, 2014, 31 pages, (Bates Nos. CC 001 to CC 020).
2. CPS Referral Summary #1618945, dated April 7, 2014, 4 pages, (Bates Nos. CC 021 to CC 024).
3. CPS Referral Summary # 1643346, dated December 22, 2014, 7 pages, (Bates Nos. CC 025 to CC 031).
4. Present Danger Plan (PDP), dated December 24, 2014 1 page, (Bates No. CC 032).
5. CPS Referral Summary # 1643759, dated December 29, 2014, 6 pages, (Bates Nos. CC 033 to CC 038).
6. Referral to Boys Town, dated December 29, 2014, 2 pages, (Bates Nos. CC 039 to CC 040).
7. Nevada Initial Assessment Summary, dated January 5, 2015, 11 pages, (Bates Nos. CC 041 to CC 051).
8. Referral to Southern Nevada Health District, dated January 6, 2015, 1 page, (Bates No. CC 052).
9. Nomination and Consent for Guardianship, dated January 7, 2015, 1 page, (Bates No. CC 053).
10. Las Vegas Metropolitan Police Department Communications Report LLV 150107001988, with Audio, dated January 7, 2015, 3 pages and audio, (Bates Nos. CC 054 to CC 056). (Audio will be sent via USPS registered international only).
11. Request for Appeal, dated February 12, 2015, 1 page, (Bates No. CC 057).
12. Receipt of Request for Appeal, dated February 12, 2015, 1 page, (Bates No. CC 058).
13. Finding of Substantiation with Attachment, dated August 27, 2015, 9 pages, (Bates Nos. CC 059 to CC 067).
14. Request for Fair Hearing, dated September 9, 2015, 3 pages, (Bates Nos. CC 068 to CC 070).

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- 1 15. Notification of Fair Hearing, dated August 18, 2017, 1 page, (Bates No.  
2 071).
- 3 16. The Insurance Company of The State of Pennsylvania Confirmation of  
4 Binding on Insurance Policy No. 6907996 for policy period July 31, 2013  
5 through July 31, 2014. Premium information redacted (Bates Nos. CC 072  
6 to CC 074).
- 7 17. The Insurance Company of The State of Pennsylvania Revised Confirmation  
8 of Binding on Insurance Policy No. 6907996 for policy period July 31, 2014  
9 through July 31, 2015. Premium information redacted (Bates Nos. CC 075  
10 to CC 077).
- 11 18. Lexington Insurance Company Confirmation of Binding on Insurance  
12 Policy No. 021391481 for policy period July 31, 2014 through July 31,  
13 2015. Premium information redacted (Bates Nos. CC 078 to CC 090).
- 14 19. Lexington Insurance Company Insurance Policy No. 021391481 for policy  
15 period July 31, 2015 through July 31, 2016. Premium information redacted  
16 (Bates Nos. CC 091 to CC 110).
- 17 20. Lexington Insurance Company Confirmation of Binding on Insurance  
18 Policy No. 021391481 for policy period July 31, 2015 through July 31,  
19 2016. Premium information redacted (Bates Nos. CC 111 to CC 122).
- 20 21. Affidavit regarding UNITY Case Notes Case: 1362510 (Bates Nos. CC  
21 123).
- 22 22. Investigation Policies (Bates Nos. CC 124 to CC 233).
- 23 23. Investigation Guidelines (Bates Nos. CC 234 to CC347).
- 24 24. Investigation Documentation (Bates Nos. CC 348 to CC 396).
- 25 25. Nevada Child Abuse and Neglect Allegation Definitions (Bates Nos. CC  
26 397 to CC 401).
- 27 26. Nevada Substantiation Policy (Bates Nos. CC 402 to CC 409).

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Defendants GEORGINA STUART and CLARK COUNTY reserve the right to  
utilize any documents identified by Plaintiff or any other party up to the time of trial.

1 WITNESSES

- 2 1. Steve Eggleston  
3 Plaintiff in Proper Person  
4 Goose Hall Bourne Farm East Town Road  
5 Pilton England BA4 4NX  
6 Phone +44 7801 931682

7 Steve Eggleston is expected to testify regarding his knowledge of the details of the  
8 incident that is the subject of this litigation.

- 9 2. Laura Rodriguez, (Battistella)  
10 Address and Telephone number unknown

11 Laura Rodriguez is expected to testify regarding her knowledge of the details of the  
12 incident that is the subject of this litigation.

- 13 3. Rodriguez  
14 Address and Telephone number unknown

15 Alexis Rodriguez is expected to testify regarding her knowledge of the details of  
16 the incident that is the subject of this litigation.

- 17 4. Selena Rodriguez  
18 Address and Telephone number unknown

19 Selena Rodriguez is expected to testify regarding her knowledge of the details of  
20 the incident that is the subject of this litigation.

- 21 5. [REDACTED] Rodriguez  
22 Address and Telephone number unknown

23 [REDACTED] Rodriguez is expected to testify regarding her knowledge of the details of  
24 the incident that is the subject of this litigation.

- 25 6. [REDACTED] Rodriguez  
26 Address and Telephone number unknown

27 [REDACTED] Rodriguez is expected to testify regarding his knowledge of the details of the  
28 incident that is the subject of this litigation.

7. [REDACTED] Eggleston 300 Ashley Drive New Lenox, IL 60451  
Phone unknown

[REDACTED] Eggleston is expected to testify regarding his knowledge of the details of  
the incident that is the subject of this litigation.

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8. [REDACTED] Eggleston  
300 Ashley Drive  
New Lenox, IL 60451  
Phone unknown

[REDACTED] Eggleston is expected to testify regarding his knowledge of the details of the incident that is the subject of this litigation.

9. Brian Callahan  
300 Ashley Drive  
New Lenox, IL 60451  
Phone unknown

Brian Callahan is expected to testify regarding his knowledge of the details of the incident that is the subject of this litigation.

10. Lisa Callahan  
300 Ashley Drive  
New Lenox, IL 60451  
Phone 815-685-0625

Lisa Callahan is expected to testify regarding her knowledge of the details of the incident that is the subject of this litigation.

11. Officer Charles Yannis, P# 6024  
Las Vegas Metropolitan Police Department  
400 S. Martin Luther King Boulevard  
Las Vegas, NV 89106  
702-828-3111

Officer Yannis is expected to testify regarding his knowledge of the incident that occurred on January 7, 2017 regarding the guardianship of the Eggleston Boys.

12. Officer Armando Leija, (Retired) P# 2020  
Las Vegas Metropolitan Police Department  
400 S. Martin Luther King Boulevard  
Las Vegas, NV 89106  
702-828-3111

Officer Leija is expected to testify regarding his knowledge of the incident that occurred on January 7, 2017 regarding the guardianship of the Eggleston Boys.

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13. Chief of Police Tom Sulley  
Orland Hills Police Department  
16039 S. 94th Ave.  
Orland Hills, IL 60487  
708-349-3132

Chief Sulley is expected to testify regarding his knowledge of the welfare check he performed at the Callahan home in January, 2015.

Clark County Employees

14. Georgina Stuart, Defendant  
Sr. Family Services Specialist  
Department of Family Services  
c/o Ofelia L. Monje  
Clark County District Attorney's Office - Civil Division  
500 Grand Central Parkway, 5th Floor  
Las Vegas, NV 89155  
Phone 702-455-4761
15. Peggy Johnson  
Legal Office Assistant II  
Department of Family Services  
c/o Ofelia L. Monje  
Clark County District Attorney's Office - Civil Division  
500 Grand Central Parkway, 5th Floor  
Las Vegas, NV 89155  
Phone 702-455-4761
16. Lisa Gibson  
Family Services Supervisor  
Department of Family Services  
c/o Ofelia L. Monje  
Clark County District Attorney's Office - Civil Division  
500 Grand Central Parkway, 5th Floor  
Las Vegas, NV 89155  
Phone 702-455-4761
17. Lisa McKay  
Family Services Manager  
Department of Family Services  
c/o Ofelia L. Monje  
Clark County District Attorney's Office - Civil Division  
500 Grand Central Parkway, 5th Floor  
Las Vegas, NV 89155

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Phone 702-455-4761

As Clark County employees the preceding witnesses are expected to testify to the details of the incident that is the subject of this litigation.

18. CUSTODIAN OF RECORDS/PERSON MOST KNOWLEDGEABLE  
CLARK COUNTY DEPARTMENT OF FAMILY SERVICES, Defendant  
% Felicia Galati, Esq.  
OLSON, CANNON, GORMLEY  
ANGULO & STOBERSKI  
9950 West Cheyenne Avenue  
Las Vegas, NV 89129

This witness is expected to testify as to his/her knowledge concerning the subject matter of this litigation. He/she may also be called upon to testify within his/her respective course and scope of employment in connection with the documentation produced and any matters related to the allegations in the Complaint.

19. CUSTODIAN OF RECORDS/PERSON MOST KNOWLEDGEABLE  
CLARK COUNTY FINANCE DIVISION  
% Felicia Galati, Esq.  
OLSON, CANNON, GORMLEY  
ANGULO & STOBERSKI  
9950 West Cheyenne Avenue  
Las Vegas, NV 89129

This witness is expected to testify regarding documentation relevant to the allegations in Plaintiff's Complaint on file herein. He/she may also be called upon to testify within his/her respective course and scope of employment in connection with the documentation produced and any matters related to the allegations in the Complaint.

20. CUSTODIAN OF RECORDS/PERSON MOST KNOWLEDGEABLE  
CLARK COUNTY HUMAN RESOURCES DIVISION  
% Felicia Galati, Esq.  
OLSON, CANNON, GORMLEYANGULO & STOBERSKI  
9950 West Cheyenne Avenue  
Las Vegas, NV 89129

This witness is expected to testify regarding documentation relevant to the allegations in Plaintiff's Complaint on file herein. He/she may also be called upon to testify within his/her respective course and scope of employment in connection with the documentation produced and any matters related to the allegations in the Complaint.

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21. CUSTODIAN OF RECORDS/PERSON MOST KNOWLEDGEABLE  
CLARK COUNTY INFORMATION TECHNOLOGY DIVISION  
% Felicia Galati, Esq.  
OLSON, CANNON, GORMLEY  
ANGULO & STOBERSKI  
9950 West Cheyenne Avenue  
Las Vegas, NV 89129

This witness is expected to testify regarding documentation relevant to the allegations in Plaintiff's Complaint on file herein. He/she may also be called upon to testify within his/her respective course and scope of employment in connection with the documentation produced and any matters related to the allegations in the Complaint.

Defendants GEORGINA STUART and CLARK COUNTY reserve the right to call any witnesses identified by Plaintiff or any other party up to the time of trial.

Defendants GEORGINA STUART and CLARK COUNTY reserve the right to supplement this document and witness list.

DATED this 24<sup>th</sup> day of July, 2018.

OLSON, CANNON, GORMLEY  
ANGULO & STOBERSKI

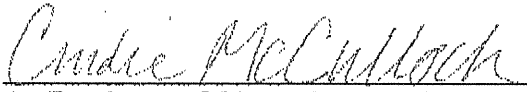
*/s/ Felicia Galati, Esq.*

By \_\_\_\_\_  
FELICIA GALATI, ESQ.  
Nevada Bar No. 007341  
9950 West Cheyenne Avenue  
Las Vegas, Nevada 89129  
Attorneys for Defendants  
CLARK COUNTY and  
GEORGINA STUART

1 CERTIFICATE OF SERVICE

2 On the 24<sup>th</sup> day of July, 2018, the undersigned, an employee of Olson, Cannon,  
3 Gormley, Angulo & Stoberski, hereby served a true copy of DEFENDANTS'  
4 GEORGINA STUART AND CLARK COUNTY THIRD SUPPLEMENTAL  
5 DISCLOSURE STATEMENT PURSUANT TO N.R.C.P. 16.1, to the parties listed  
6 below via e-mail and United States mail:  
7

8 Steve Eggleston  
9 Goose Hall, Bourne Farm, East Town Road  
10 Pilton, England, Post Code: ba4 4nx  
11 +44 7801 931682  
12 Theeggman411@gmail.com  
13 Plaintiff in Pro Per

14   
15 An Employee of Olson, Cannon, Gormley  
16 Angulo & Stoberksi  
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