



1 MOT  
2 Kerry J. Doyle  
3 Nevada Bar No. 10571  
4 *kdoyle@DoyleLawGroupLV.com*  
5 **DOYLE LAW GROUP**  
6 7375 S. Pecos Rd., #101  
7 Las Vegas, NV 89120  
8 *Co-Counsel for Plaintiffs*

9 Kurt K. Harris, Esq.  
10 Nevada Bar No.: 5354  
11 4730 S. Fort Apache Rd., Suite 300  
12 Las Vegas, NV 89147  
13 (702) 252-3838  
14 [kharris@702law.com](mailto:kharris@702law.com)  
15 Attorney for Plaintiffs,  
16 Kurt Harris and Kurt K. Harris, Esq., P.C.

17 **DISTRICT COURT**

18 **CLARK COUNTY, NEVADA**

19 KURT K. HARRIS, ESQ. P.C., )  
20 a Nevada corporation; and, KURT HARRIS, )  
21 an individual, )  
22 )  
23 Plaintiffs, )  
24 vs. )  
25 ERNEST DEL CASAL, an individual; MICHAEL )  
26 FRANKLIN, JR., an individual; MCNW )  
27 MARKETING, an unknown entity or tradename; )  
28 DOES I through X and ROE Corporations or )  
Business Entities I through X. inclusive, )  
Defendants. )

CASE NO.: A-18-781255-C  
DEPT NO.: 29

**MOTION TO REVOKE MEDIA  
REQUEST AND ORDER  
ALLOWING CAMERA ACCESS  
TO COURT PROCEEDINGS**

29 COMES NOW, Plaintiffs, Kurt Harris and Kurt K. Harris, Esq., P.C., by and through  
30 counsel, Kurt Harris, Esq., and hereby moves this Honorable Court for an Order Granting the  
31 Motion to Revoke the Order Granting the Media Request Allowing Camera Access to Court  
32 Proceedings as follows:

1 This Motion is made and based upon the attached points and authorities, Supreme Court  
2 Rules 229-246, the papers and pleadings on file herein and such oral argument as the Court may  
3 deem appropriate at the hearing on this Motion.

4 **DECLARATION IN SUPPORT OF MOTION TO STRIKE**

5 STATE OF NEVADA )  
6 ) ss.  
7 COUNTY OF CLARK )

8 KURT K. HARRIS, ESQ., being first duly sworn, deposes and says:

9 1. That I am a duly licensed and practicing attorney of the State of Nevada, with  
10 Harris Law Office, maintaining offices at 4730 S. Fort Apache Road, Suite 700, Las Vegas, NV  
11 89147;

12 2. That I am one of the attorneys of record for the Plaintiffs in the above-entitled  
13 matter and am competent to testify herein;

14 3. That on or about September 19, 2019, the Honorable Judge Rob Bare, Department  
15 32 granted a Media Request and Order Allowing Camera Access to Court Proceedings

16 4. That since that time, it has come to my attention that Defendant, ERNEST DEL  
17 CASAL, invited Our Nevada Judges, which is not a lawful company or corporation, to come and  
18 film and broadcast the proceedings.

19 5. That it is my belief that Defendant, ERNEST DEL CASAL wants to cause a  
20 maximum amount of embarrassment not only to himself but to others and desires to have a  
21 production.

22 6. The based upon my observations, Defendant, MICHAEL FRANKLIN just goes  
23 along with whatever Defendant, DEL CASAL tells him to do.

24 7. That no prior objection was made or motion for an order as the hearings involved  
25 only myself and the Defendants. Based upon the comments on Youtube, Defendants have been lost  
26 in the court of public opinion.

27 8. That a Jury Trial is now set to commence on July 18, 2022.

28 9. That the members of the Jury are entitled to privacy and should not become part of

1 the Defendant's production as they have requested the cameras there.

2 10. That although I am a party, my witnesses did not bargain and request to be filmed  
3 and should not be put on the internet for being pulled into this case by the Defendants.

4 11. That Gerald Sufleta is currently retired and would like to live his life in peace without  
5 being put on the internet and have details of his personal life published on youtube or any other  
6 venue. This man has earned his peace.

7 12. That Cam Harris has four young children and a wonderful family and should not be  
8 required to testify in front of a camera which he did not request and for which the Defendants have  
9 cased and created the situation.

10 13. That Oliver Melgar, Esq., is a respected attorney and should not be forced to have his  
11 testimony published on the internet because he is a friend and colleague. Mr. Del Casal testified at  
12 his deposition that he was not fond of Mr. Melgar and seemed to take a personal, perhaps religious  
13 issue with him. Mr. Melgar did not request the opportunity to testify but was asked.

14 14. That Scott Caterer lives a quiet and private life and should not be subjected to DEL  
15 CASAL's goal of attempting to embarrass him with more insults to be published on the internet  
16 which will mirror the lies and insults contained in Defendant, DEL CASAL's publication.

17 15. That George Boyer is a good man. He lives a quiet life and should not be subjected  
18 to DEL CASAL's goal of attempting to embarrass him with more insults to be published on the  
19 internet which will mirror the lies and insults contained in Defendant, DEL CASAL's publication.

20 16. That during his deposition, Defendant, DEL CASAL became angry with questions of  
21 his marijuana use and objected saying it "was not Utah" taking a swipe at me and my religious  
22 convictions. I would prefer to not provide him with filmed platform to spew his angst and  
23 statements about very personal matters.

24 17. None of these witnesses asked for this. The publication is admitted to be done by  
25 FRANKLIN and all witnesses will testify that DEL CASAL is the author.

26 18. That their wrongful conduct caused and created this case.

27 19. That pursuant to the order of the Court, the original request was granted at the  
28 discretion of the Court.



1 Pursuant to Supreme Court Rule 231, this court has the authority to revoke the permission.

2 2. This authorization may be revoked at any time without prior notice when, in the judge’s  
3 discretion, it appears that electronic coverage of the judicial proceedings is interfering in any way  
4 with the proper administration of justice.

5 Plaintiffs request the Court make specific findings that the case would be disrupted by the  
6 media coverage and that it would be disruptive to the witnesses and jury involved.

7 **II. CONCLUSION**

8 Based upon the foregoing, Plaintiffs respectfully requests that the Court grant the Motion  
9 to Revoke the Order Allowing Camera Access.

10 DATED this 16<sup>th</sup> day of July, 2022.

*/s/ Kurt Harris*

11 \_\_\_\_\_  
12 Kurt K. Harris, Esq.  
13 4730 S. Fort Apache Road, Suite 300  
14 Las Vegas, NV 89147  
[kharris@702law.com](mailto:kharris@702law.com)  
15 Attorney for Plaintiffs

16 **CERTIFICATE OF SERVICE**

17 Pursuant to NRCPC 5(b) I hereby certify that I am an employee of HARRIS LAW OFFICE,  
18 and that on the 16<sup>th</sup> day of July, 2022, I served a true and correct copy of the Motion to Revoke the  
19 Order Granting the Media Request Allowing Camera Access to Court Proceedings serving the  
20 same through the court's efile system in Clark County, Nevada.

21 NEEDHAM LAW FIRM  
22 ALAN NEEDHAM, ESQ.  
23 3216 W. Charleston Blvd., Ste. A  
24 Las Vegas, Nevada 89102

Alexander Falconi  
Our Nevada Judges  
Via eservice

25 Alda Anderson, Esq.  
26 700 S. Fourth Street  
27 Las Vegas, Nevada 89102

*/s/ Kurt Harris*

28 \_\_\_\_\_  
An employee of HARRIS LAW OFFICE