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REC'D & FILED
2022 AUG -1 PM 3: 21
AUBREY HOWLATT
CLERK
BY C. FRANZ
DEPUTY

5 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
6 IN AND FOR THE COUNTY OF CARSON CITY

7
8 STEVE EGGLESTON,
Petitioner,

9 vs.

10 Clark County Department of Family Services,
11 Respondent.

Case No.: 20-OC-001641B

Dept. No.: II

12
13 **REPLY TO RESPONSE TO MOTION TO UNSEAL**

14 COMES NOW, Alexander Falconi d/b/a/ Our Nevada Judges¹, by and through the
15 undersigned counsel, and hereby files the following reply to the Opposition to Unseal
16 filed by the Clark County Department of Family Services ("CCFS"). This reply is based upon the
17 following memorandum of points and authorities and all pleadings on file herein.
18

19 **Memorandum of Points and Authorities**

20 In its opposition, CCFS appears to oppose the disclosure of documents and reports that
21 Our Nevada Judges is not currently requesting. CCFS states that Our Nevada Judges is seeking
22 to unseal the entire file of record in this case, meaning all of the documents in the record. See
23 Opposition at 3 line 11. CCFS fundamentally misunderstands the relief requested in the Motion,
24 which requests the docket, party names, attorney names, document titles, hearing dates, etc, as
25 required by SRCR 3(5)(c) and SRCR 3(7)(a)(3) be disclosed, and that the Court preclude the
26

27
28 ¹ Alexander M. Falconi owns, operates, and controls the Our Nevada Judges organization, including but not limited to the website, YouTube, Facebook, and Twitter platforms.

1 Proposed Order submitted as Exhibit 2 with the Motion.

2 SRCR 3(7)(a)(1) provides that when the clerk receives a court order to seal specified
3 court records, they must, “Preserve the docket code, document title, document and subdocument
4 number, and date of the original court records on the court’s docket.” This has not occurred in
5 this case. Further, under SRCR 3(7)(a)(3), the sealing order is a public document. However,
6 Our Nevada Judges has not been able to obtain this information from the Clerk of the Court
7 because the “entire file” has been sealed.
8

9 To be clear, Our Nevada Judges is only asking for the mandatory minimum information
10 required to be disclosed in each case under the SRCR.

11 Our Nevada Judges reiterates its request for this Court to restore public access to the docket,
12 consistent with SRCR 3(7) and SRCR 3(5)(c). Furthermore, Our Nevada Judges requests that the
13 findings supporting sealing be made publicly available as required by SRCR 3(7)(a)(3).
14

15 **AFFIRMATION:** This document does not contain a social security number of any person.

16 RESPECTFULLY SUBMITTED this Wednesday, August 10,
17 2022:

18 By: _____
19 Luke Busby, Esq.
20 Nevada Bar No. 10319
21 316 California Ave.
22 Reno, Nevada 89509
23 775-453-0112
24 *Attorney for Our Nevada Judges*
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1 **NRCP 5² Certificate of Service**

2 I, Luke Busby, do hereby certify that I placed a true and correct copy of this *Motion* and
3 placed it into a sealed envelope and mailed it, via United States Postal Service, addressed as
4 follows:

5 Paola Armeni, Esq.
6 3800 Howard Hughes Pkwy.
7 Suite 500
8 Las Vegas, NV 89169

Amity C Dorman, Esq.
601 N. Pecos Rd.
Building B, Room 470
Las Vegas, NV 89101

9 EXECUTED this Wednesday, August 10, 2022

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11 _____
12 Luke Busby
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28 _____
² SRCR 3(1) expressly requires service be made “in accordance with NRCP 5”.