

OBJ

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**EIGHTH JUDICIAL DISTRICT COURT
COUNTY OF CLARK
STATE OF NEVADA**

██████████) Case No.: D-20-██████████-C
)
Plaintiff,) Dept.: J
vs.)
)
██████████)
)
Defendant.)

**DEFENDANT’S OBJECTION TO THE MEDIA REQUEST AND ORDER
FOR CAMERA ACCESS TO COURT PROCEEDINGS**

Defendant, ██████████, by and through his counsel, Fred Page, Esq. of Page Law Firm, hereby submits his Objection to the Media Request and Order for Camera Access to Court Proceedings.

On February 15, 2024, the Nevada Supreme Court issued its decision in *Falconi v. Eighth Judicial District Court*, 140 Nev. Adv. Op. 8 (2024). In *Falconi*, the Nevada Supreme Court held, “EDCR 5.207, EDCR 5.212, and NRS 125.080

1 are unconstitutional to the extent they permit closed family court proceedings
2 without the exercise of judicial discretion.” *Id.* at 2.

3 Under the *Falconi* decision district courts may not automatically seal
4 custody proceedings, but must instead, make particularized finding to determine,
5 “(1) if and when to order closure in any proceeding,” and “(2) to what extent such
6 closure should apply.” *Id.* at 14.
7

8
9 After the issuance of the Falconi decision last week, on Saturday, February
10 17, 2024, Alexander Falconi served a (1) Media Request and Order for Camera
11 Access to Court Proceedings (the “Media Request”), and (2) Notice of Intent to
12 Unseal (the “Notice”) on the parties in this action.
13

14
15 The Media Request states in part:

16 I certify that I am familiar with the contents of Nevada Supreme
17 Court Rules 229-249, inclusive, and understand this form MUST be
18 submitted to the Court at least TWENTY-FOUR (24) hours before
19 the proceedings commence, unless good cause can be shown.

20 *Id.*

21 Defendant respectfully submits that the Court should not permit any
22 audio/visual recording or photography by members of the media in the courtroom
23 during the June 21, 2024 evidentiary hearing.
24

25 Defendant wishes that this action remains as private as possible in order to
26 protect the interests of their child. In *Falconi*, the Court laid out three factors that
27 must be shown: “(1) closure serves a compelling interest; (2) there is a substantial
28


1 probability that, in the absence of closure, this compelling interest could be
2 harmed; and (3) there are no alternatives to closure that would adequately protect
3 the compelling interest.” *Id.* at 13.
4

5 The evidentiary involves a minor child which is a compelling interest. [REDACTED]
6 [REDACTED] is a known name in Las Vegas and the parties having a dispute involving
7 their child being publicized will harm their child as once something is published
8 there is no taking it back. There are no alternatives that would protect the child’s
9 and the parties’ compelling interests in keeping their private matters private.
10
11

12 Defendant respectfully submits that under the present circumstances, the
13 Media Request should be denied (the denial of which would not prevent him from
14 being in the courtroom on June 21, 2024.
15

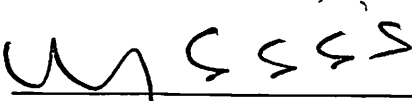
16 DATED this 20th day of June 2024
17

18 PAGE LAW FIRM

19 
20 _____
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24 Las Vegas, Nevada 89113
25 (702) 823-2888
26 Attorney for Defendant
27
28

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 20 day of June 2024, that the foregoing Defendant's Objection to Media Request was served pursuant NEFCR 9 via e-service to James Jimmerson, Esq. attorney for Plaintiff.



An employee of Page Law Firm

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