Docket No. _____

IN THE SUPREME COURT STATE OF NEVADA

Electronically Filed
May 01 2024 03:41 PM
Elizabeth A. Brown
Clerk of Supreme Court

LEANNE NESTER, an individual

Petitioner,

v.

The EIGHTH JUDICIAL DISTRICT COURT – FAMILY DIVISON Of the STATE Of NEVADA, In and for the COUNTY of CLARK; and the HONORABLE BRYCE C. DUCKWORTH, DISTRICT JUDGE,

Respondent,

And

CODY GAMBLE, an individual,

Real Party In Interest.

PETITION FOR A WRIT OF MANDAMUS

Honorable Bryce C. Duckworth, District Court Judge, Department Q
Eighth Judicial District Court – Family Division, Clark County,
Case No. D-21-639924-D

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NRAP 26.1 DISCLOSURE STATEMENT

The undersigned counsel of record certifies that the following are persons and entities described in Nevada Rule of Appellate Procedure (NRAP) 26.1(a) that must be disclosed. Petitioner Leanne Nester (hereinafter "Leanne") is an individual and therefore does not have parent companies and is not owned by any publicly traded companies. Leanne was represented in the district court and in these original writ proceedings by:

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These representations are made so that the Justices of this Court may evaluate possible disqualifications or recusals.

DATED: May 1, 2024.

By: */s/ Shannon R. Wilson*
Shannon R. Wilson (9933)

ROUTING STATEMENT

While this writ petition involves post-divorce child custody, *see* NRAP 17(b)(10), it is primarily being brought to resolve a conflict and/or obtain clarity in Nevada law and this Court's published opinions over a matter of statewide public importance. Accordingly, jurisdiction is properly retained by this Court. *See* NRAP 17(12).

PETITION FOR WRIT RELIEF

This writ concerns the overriding interests of minor children and parents to custody proceedings that will be prejudiced by an open hearing.

I. RELIEF SOUGHT.

Petitioner Leanne Nester (hereinafter "Leanne" or "Mom") requests this Court issue a writ directing and/or prohibiting the district court from holding an open hearing. Alternatively, Leanne requests this Court to exclude cameras and recording devices from the courtroom. The district court in this case erroneously believes that an open hearing is mandatory pursuant to *Falconi v. Eighth Jud. Dist. Ct. in & for Cnty. of Clark*, 140 Nev. Adv. Op. 8, 543 P.3d 92 (2024). The district further erroneously believes pursuant to *Falconi* that restrictions on media access are neither practical nor realistic, beyond the most basic restrictions afforded by SRCR 2(6).

This Court recognized in *Falconi*, "the closure of various family law proceedings can and will be warranted in various instances." *Falconi*, 543 P.3d at 99. Presumably, those instances arise where the best interest of children or the privacy rights of children or parents -- otherwise protected under the law -- are compromised by the presence of the public and press, and the latter must give way to the former and proceedings must be closed. For instance, where the specific facts of the case involve – as they do here -- child custody evaluations, mental health examinations, children's medical records, involvement of child protective services,

allegations of abuse between siblings, and the testimony is expected to feature medical and mental health professionals and representatives of child protective services, these facts warrant a closed hearing. Extraordinary relief and intervention by this Court is warranted.[1] Respectfully, action is requested as soon as is convenient to this Court.[2]

II. STATEMENT OF FACTS.

As a preliminary matter, Leanne notes it is tricky to state the facts that support her requested relief with particularity without "letting the genie out of the bottle," so to speak. Additionally, there is the matter of this case being sealed pursuant to NRS 125. 110(2); therefore, Leanne included in her appendix only those documents that remain open to the public per that statute, and she shall hand deliver her motion for submission of the remainder of the relevant documents under seal to the Supreme Court.

A. Case Background and General Allegations of Parties' Present Dispute

Leanne and Real Party in Interest Cody Gamble (hereinafter "Cody" or "Dad") were married September 23, 2018 and divorced by stipulated decree of

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[1] The NRAP 8 motion for stay of the district court proceedings was heard on April 30, 2024, and the district stated it would continue the evidentiary hearing set for May 2, 2024 if the writ petition was filed.

[2] On April 30, 2024, the district court state it would reset the trial to its first available trial date upon disposition of the writ petition.

divorce entered on July 21, 2022. The parties share two minor children, a girl, Zion Leanne Gamble ("ZLG") born November 21, 2019, age 4 1/2, and, a boy, Zeke Maurice Gamble ("ZMG"), born May 30, 2022, age 23 months. Additionally, Dad has two older children from his first marriage, two boys, "NG" born February 24, 2009, age 15, and "IG" born September 2, 2011, age 12.

The Decree provided, *inter alia*¸ that the parties would share joint legal and joint physical custody of their minor children. The timeshare arrangement stated in the Decree is unique. The timeshare is different for each child with Mom having more time than Dad while the children are younger, and Dad's time increases at stated intervals until age six, at which time each child will exercise a rolling 3 / 3 timeshare with each parent, this is due and owing to Dad's firefighter work schedule. The 3 / 3 schedule is what Dad exercises with his two older boys.

Less than six months after the stipulated decree was entered, on November 30, 2022, Cody filed a motion to modify custody. Leanne filed an opposition and counter-motion. On December 28, 2022, Leanne filed a request to seal pursuant to NRS 125.110, and on January 9, 2023, the order to seal was entered.

The hearing on Cody's motion to modify custody and Leanne's opposition and countermotion was held on January 11, 2023, at which time The Honorable Bryce Duckworth suggested he would likely need the assistance of an outsourced provider to understand the issues the parties raised in their moving papers, and the

parties stipulated to a custody evaluation. They agreed to use Kathleen Bergquist, Psy.D. The custody evaluation was performed and completed, and it included psychological evaluations of both parties. Dr. Bergquist's evaluation made several recommendations, most of which the parties implemented by a stipulation and order filed October 17, 2023.[3]

During the pendency of the custody evaluation by Dr. Bergquist, in May 2023, ZLG made statements to Mom about acts upon ZLG by her older brother in Dad's household that were disconcerting to say the least. ZLG had made similar, but not quite so serious, statements previously, and when Mom had shared the less serious statements with Dad, Dad was dismissive. When Mom shared the more concerning statements with Dad, Dad's response was non-responsive. Mom made contact with child protective services ("CPS"). The investigation eventually concluded as "unsubstantiated," but what precisely was unsubstantiated is not clear in the CPS records, the further statements by ZLG during her forensic interview and statements

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[3] Dr. Bergquist recommended *inter alia* the parties continue to share joint physical custody. Dad's pretrial memorandum filed February 23, 2024, seeks to modify the parties' joint physical custody arrangement to give him primary physical custody or, in the alternative, to accelerate to the final phase of the parties' graduated timeshare schedule, which would not otherwise happen until each child is six years old. Mom's pretrial memorandum filed February 23, 2024 does not seek to modify custody or timeshare, it seeks only to reduce the parties' current 5 hour right of first refusal to anytime either party is unavailable for the children with the parent receiving the right to be responsible for the children's transportation to cause the least disruption on the otherwise custodial parent.

of others interviewed did nothing to dispel Mom's concerns, indeed, since reading the report, she has as many concerns as she ever did. Presumably, this is what prompted both CPS and the custody evaluator's recommendations that Dad never leave ZLG with NG or IG unless Dad or his father is present to supervise.

B. ONJ'S Submission of an Ex Parte Media Request Prompted Leanne's Motion to Seek Trial Continuance and the Cascade of Events Leading to this Petition

This matter was initially set for trial on Thursday, February 29, 2024. Witnesses included the parties, Dr. Bergquist, CPS workers, the children's pediatrician, and percipient witnesses for each party. On February 15, 2024, the Nevada Supreme Court issued the decision in *Falconi*. On February 17, 2024, Alexander Falconi and Our Nevada Judges (hereinafter "ONJ"), unbeknownst to Leanne or her counsel submitted a Media Request and Order to the Department; he did not copy counsel or parties on the submission. *See* EDCR 5.211(a) ("Any written communication with the court shall be contemporaneously copied to all other parties.") Leanne's counsel learned of the Media Request on the afternoon of Monday, February 26, 2024. On February 27, 2024, Leanne filed a motion to continue the trial so that she could retain counsel to advise and represent her[4] on Mr.

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[4] Hutchison & Steffen, PLLC represented Leanne in the original divorce proceeding, and after having completed all matters for which they were retained, filed a notice of withdrawal on July 21, 2022. Since Dad's motion to modify custody, Mom has retained Hutchison & Steffen, PLLC on a series of limited scope, flat fee plus cost (i.e., reduced fee) representations. The undersigned has attempted to assist Leanne

Falconi's pending media request which sought to have his video camera in the courtroom.

On February 29, 2024, the parties appeared, ready for trial. The first matter of business was Mr. Falconi's Media Request and Order. After some colloquy between the district court, Mom's counsel, Dad, Mr. Falconi, and Assistant District Attorney Amity Leighton (who was present to represent the subpoenaed CPS representatives), the district court stated it would continue the trial to May 2, 2024, sign the Media Request and Order, and if Mom filed a motion for reconsideration of the media request and order, then the district court would decide it before that time.

On February 29, 2024, the district court signed the Media Request and Order. *See* PA0001-0002. On March 14, 2024, Leanne filed her Motion for Reconsideration of the Media Request and Order *and* For Closed Hearing. *See* PA0003-0020. On March 15, 2024, ONJ filed an opposition. *See* PA0021-31. Cody filed nothing in response to the motion for reconsideration and for closed hearing. On March 22, 2024, Leanne filed her Reply in Support of Motion for Reconsideration and for Closed Hearing. *See* PA0032-44. On April 9, 2024, the district court issued its order denying Leanne's motion to reconsider the media order and close the hearing. PA0045-0052.

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to find other counsel to represent her in the ancillary matters pertaining to the *Falconi* decision, but without success as other counsel are too busy or too expensive.

On April 19, 2024, Leanne filed a motion for stay of the May 2, 2024 hearing per NRAP 8 ("NRAP 8 Motion"). On April 22, 2024, Cody filed an opposition to the stay, and Leanne filed her reply on April 29, 2024. The district court set the NRAP 8 Motion for hearing for April 30, 2024 on shortened time, and at the hearing the district court stated, if Leanne filed her writ petition before the trial date, then the district court would stay the May 2, 2024 trial because (and here counsel paraphrases the district court but will supplement with a quotation when the audio is available) the district court does think these issues are important and require explication by the Nevada Supreme Court.

It is important for the appellate court to review the *footnotes* of the district court's April 9, 2024 order denying Leanne's request for reconsideration of the media order and for closed hearing. In the footnotes, the district court clearly shares many of the same concerns articulated in Leanne's moving papers, couching its agreement as personal opinion while above the footnote line claiming it is hamstrung by the *Falconi* decision to leave open and permit the broadcast of *all* family court proceedings. PA0045-52. However, Leanne believes the district court's personal opinion translates to some of the very grounds upon which the *Falconi* decision permits closing hearings in this case and others like it.

III. STANDARD OF REVIEW.

"A writ of mandamus is available to compel the performance of an act that the law requires . . . or to control an arbitrary or capricious exercise of discretion." *Int'l Game Tech., Inc. v. Second Judicial Dist. Court*, 124 Nev. 193, 197, 179 P.3d 556, 558 (2008) (footnote omitted); NRS 34.160. "A manifest abuse of discretion is '[a] clearly erroneous interpretation of law or a clearly erroneous application of a law or rule.'" *State v. Eighth Judicial Dist. Court (Armstrong)*, 127 Nev. 927, 932, 266 P.3d 777, 780 (2011) (quoting *Steward v. McDonald*, 958 S.W.2d 297, 300 (Ark. 1997) (alteration in original)).

Alternatively, a petition for a writ of prohibition is appropriate to challenge a district court's exercise of jurisdiction. *See Nevada Power Co. v. Eighth Jud. Dist. Ct. ex rel. Cty. of Clark*, 120 Nev. 948, 954, 102 P.3d 578, 583 (2004); NRS 34.320. This Court has ruled that the right to appeal is inadequate to correct an invalid exercise of jurisdiction. *See Fulbright & Jaworski v. Eighth Jud. Dist. Ct.*, 131 Nev. 30, 35, 342 P.3d 997, 1001 (2015); *Snooks v. Ninth Jud. Dist. Ct. In & For Cty. of Douglas*, 112 Nev. 798, 803, 919 P.2d 1064, 1067 (1996). When a petitioner contends a district court has exceeded or is about to exceed its jurisdiction, this Court reviewed the matter de novo. *See Fulbright*, 131 Nev. at 35, 342 P.3d at 1001.

In either case, NRS 34.170 provides that a writ of mandamus "shall be issued in all cases where there is not a plain, speedy and adequate remedy in the ordinary

course of law." It is within this Court's sole discretion to entertain a petition for writ relief. *Willick v. Eighth Judicial Dist. Court*, 138 Nev. 158, 159, 506 P.3d 1059, 1061 (2022). This Court has recognized that, "entertaining a petition for advisory mandamus is 'appropriate when an important issue of law needs clarification and considerations of sound judicial economy and administration militate in favor of granting the petition[.]'" *Lyft, Inc. v. Eighth Judicial Dist. Court*, 137 Nev. 832, 834, 501 P.3d 994, 998 (2021) (quoting *Archon Corp. v. Eighth Judicial Dist. Court*, 133 Nev. 816, 820, 407 P.3d 702, 706 (2017)). This Court further observed that, "advisory mandamus is appropriate when our intervention will 'clarify a substantial issue of public policy or precedential value.'" *Lyft*, 137 Nev. at 832, 501 P.3d at 998 (quoting *Walker v. Second Judicial Dist. Court*, 136 Nev. 678, 684, 476 P.3d 1194, 1199 (2020)).

Here, this petition seeks mandamus or in the alternative prohibition to clarify what the *Falconi* Court described as "extraordinary circumstances" and "various instances" in family law proceedings that constitute "overriding interests" of minor children and parents that outweigh the public and press's right of access to court proceedings and to close the hearing. (*Falconi,* 543 P.3d at 99.) An appeal is not an adequate remedy because the damage Leanne seeks to avoid will already have been done and cannot be undone.

IV. EXTRAORDINARY WRIT RELIEF IS NECESSARY.

The district court effectively wrote two analyses in its April 9, 2024 order -- one that appears in the order above the copious footnotes, and the other that appears within the footnotes. PA0045-0052. Indeed, the footnotes appear to be longer than the actual order. *Id.* Above the footnotes, the district court reads *Falconi* to put the importance of public and press access to court proceedings *ahead* of the best interests of children, even "regardless of the consequences to children." PA0051-52 at 6:6 and at *fn* 8. Surely, that is not what the *Falconi* Court intended.

The district court observed that the facts and circumstances of Leanne's case are commonplace among cases in the civil-domestic arena. PA0049, 0051. But commonplace in the domestic arena does not make it ordinary. This is one of the things the appellate court should address. When it wrote in *Falconi,* "when there are no extraordinary circumstances present, the public's right to access family law proceedings outweighs the litigant's privacy interests," was this Court contemplating the run-of-the-mill divorce or custody action where custody is largely uncontested, i.e., two parents talking about their work schedules and daily routines? *Falconi,* 543 P.3d at 99. Or did it intend to include the high-conflict, hotly contested actions featuring medical and mental health records and testimony, deeply personal and sensitive allegations, and the potential weaponization of those proceedings by one party against another in the 'court of public opinion'? Just because these things

are, unfortunately, commonplace within the civil-domestic arena, it does not scrub them of their extraordinary nature in society at large.

The district court wrote, "Leanne's Motion fails to identify a sufficient legal basis that warrant's [sic] the Court restricting public access to this proceeding or that supersedes the '*critical* importance of the public's access to the court.'" PA0049 (emphasis added, as underlined). It is inexplicable that the district does not find the following grounds identified in Leanne's moving papers sufficient legal basis to warrant a closed hearing:

The protection of children from the very custody proceedings of which they are the subject is embodied in NRCP 16.215 (governing child witnesses in custody proceedings) and EDCR 5.304 (prohibiting litigants and lawyers from discussing litigation or sharing materials of litigation with minor children). *See* PA0015. Children are protected in still other contexts: NRS 50.500 *et seq*. (Uniform Child Witness Testimony by Alternative Methods Act provides an alternate means of receiving testimony to shield children); below the age of 18, children cannot serve in the armed forces, have no right of suffrage, cannot enroll or disenroll themselves from school, contracts are voidable, juvenile justice proceedings and records are sealed, etc.

Children are provided all of these protections in other contexts, but they have no representation in the custody proceedings of their parents. Are we not going to

protect them and their best interests from the myriad invasions of their privacy from open court proceedings? Invasions which, in the modern electronic age, may well persist in perpetuity? Protecting children's relationships with parents, siblings, and family members is another factor dictating in favor of closed hearings in high-conflict child custody disputes. PA0014-0015. The historical role of courts in child custody actions acting as parens patriae is recounted in the *Falconi* dissent. *Falconi,* 543 P.3d at 103-04. That role remains even as it is balanced with the constitutional rights of parents to determine the manner their children are raised the public right to attend public hearings.

The information of a child's school location, activities schedule, individual education plan ("IEP") and/or treatment for ADHD or similar issues, the names of treaters and trusted adults, provides an easy checklist for access to a child and information to develop trust with predators. PA0015. These are not necessarily the facts of this case, but do frequently arise in these type proceedings. These safety issues dovetail into the parents' fundamental interest "in the care, custody, and control of their children." *Roe v. Roe*, 139 Nev. Adv. Opn. 21, 535 P.3d 274, 286 (Ct. App. 2023) (citing to NRS 125C.001(1) and to *Troxel v. Granville,* 530 U.S. 57, 66, 120 S. Ct. 2054, 2060, 147 L. Ed. 2d 49 (2000)(concluding that parents have a fundamental interest "in the care, custody, and control of their children.")) PA0014-0015.

Leanne filed her reply in support of her motion for reconsideration and to close the hearing in response to ONJ's opposition. PA0032-0044. Therefore, her reply included a discussion of the Nevada Supreme Court Rules on Electronic Coverage of Court Proceedings, which ONJ's opposition ignored. *Id*. Nevada already suffers a severe lack of adjunct professionals, i.e., medical and mental health providers, who are willing to supply services to litigants in family law proceedings. Opening the high-conflict proceedings in which their work is often a focal point is not going to expand the pool and may result in a chilling effect on providers who offer their opinions. Leanne's motion discussed the impact of a right to a fair trial and, among other things, the ways in which open proceedings may result in more self-censorship of litigants, lawyers, and paraprofessionals who already weigh the potential repercussions to children in offering certain evidence. The Supreme Court of Ohio recognized this issue:

> [C]oncern for the effect on [the child] would burden a lawyer's conscience as he questions the witness. A lawyer should be free of such extraneous conflicts of interest. . . When the guardian must make strategic trial decisions based upon the potential psychological harm to his ward caused by the presence of the public, the fairness of the adjudication is endangered.

In re T.R., 52 Ohio St.3d 6, 556 N.E.2d 439, 453 (1990) *cert. denied sub nom Dispatch Printing Co v. Solove*, 498 U.S. 958, 111 S. Ct. 386, 112 L.E.2d 396. *In re T.R.,* was a highly publicized custody battle where reporters were present but a

gag order was imposed, and after undertaking an analysis similar to what this Court did in *Falconi*, the Ohio Supreme Court held, *inter alia,* there is no presumption in favor of public access to proceedings to determine if a child is abused, neglected, or dependent, or to determine custody of a minor child. *Id.* at 450. The *T.R.* Court identified four other states in which presumptive closures statutes were upheld against First Amendment challenges. *Id*. at 450-51.[5] It further discussed the harms to children:

> [P]ublic access to juvenile court proceedings may have harmful effects. *When the evidence presented at a juvenile hearing is given wide coverage in the press, the effectiveness of the confidential records statutes and rules is weakened.* Public access has the potential to endanger the fairness of the proceeding or disrupt the orderly process of adjudication. Finally, intense publicity surrounding the events which have brought a child into the juvenile court may psychologically harm the child, making it more difficult, if not impossible, for the child to recover from those events. *See Smith, supra*, 443 U.S. at 108, fn. 1, 99 S.Ct. at 2673, fn. 1 (Rehnquist, J., concurring).

In re T.R., 52 Ohio St. 3d at 18, 556 N.E.2d at 451 (emphasis added). The emphasized passage quoted above is the same concern the district court here

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[5] Each of the cases cited for this proposition did involve the allegation of a juvenile crime, they were not child custody matters as in *In re T.R.* and the instant case. However, there is no logical reason that juveniles accused of crimes should be afforded more privacy and protection than minors who, through no fault of their own, are the subject matter of a public proceeding. The same goes for the protections afforded minors under NRS Chapter 126, NRS 432B, and others.

recognized in footnote 5. (PA0049-0050. The *T.R.* Court acknowledged the important interest and role the public has in court proceedings and articulated a two prong analysis to decide whether a presumptively closed hearing should be open: "(1) there exists a reasonable and substantial basis for believing that public access could harm the child or endanger the fairness of the proceeding, and (2) the potential for harm outweighs the benefits of public access." *In re T.R.*, 52 Ohio St. 3d at 18–19, 556 N.E.2d at 451.

While the main focus has been on the best interest and privacy concerns attendant to children in these proceedings, the parents have similar claims to fairness, safety, and privacy. There is an entire set of regulations attendant to the Health Insurance Portability and Accountability Act ("HIPAA") that protects medical and mental health records. *See* 45 CFR Part 160(A-E); 45 CFR Part 164. The district court recognized limiting access to mental health records pursuant to SRCR 2(6) would not stop "testimony regarding children's mental and emotional well-being [from] being broadcast and potentially accessed by friends and acquaintances of the children and should frighten any parent from having matters decided in a court of law." PA0049-50 at *fn* 5. This is also true of parents who have been through a custody evaluation, including a psychological evaluation, as Leanne and Cody did, and their privacy rights, while waived as between them and the court, should nevertheless be shielded from the public. Indeed, the knowledge that these

evaluations may be made public going forward will likely weigh into parties' decisions to stipulate to them and deprive the court and litigants of a tool that is useful to resolve the most intransigent cases before family court judges. Indeed, the prospect of open hearings and broadcasting those hearings in particularly high-conflict custody cases may well be used as a means to bully and intimidate a parent who does not want their life, or the lives of their children, open for their family, friends, acquaintances, or employers to see.

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V. CONCLUSION.

The district court's decision denying the Motion for Reconsideration of Media Order and Request and For Closed Hearing was clearly erroneous and an abuse of discretion that must be corrected. The district court misconstrued this Court's decision in *Falconi* by effectively concluding that no family law proceeding would ever present an extraordinary circumstance or overriding interest sufficient to outweigh the public's right of access to family law proceedings. Leanne articulated several overriding interests for both the children and her that will to be prejudiced if the hearing is not closed. This district court error must be corrected. Respectfully Leanne Nester requests her petition be granted and writ issue.

DATED: May 1, 2024.

HUTCHISON & STEFFEN, PLLC

By: */s/ Shannon R. Wilson*
Shannon R. Wilson (9933)

VERIFICATION

I, Shannon R. Wilson, hereby declare pursuant to NRAP 21(a)(5) as follows:

1. I am an attorney actively licensed with the Nevada State Bar (9933), and an attorney with the law firm Hutchison & Steffen, PLLC.

2. I verify that I have read the foregoing PETITION FOR WRIT OF MANDAMUS and that it is true to my own knowledge, except for matters therein stated on information and belief, and as to those matters, I believe them to be true and correct to the best of my knowledge.

DATED: May 1, 2024.

HUTCHISON & STEFFEN, PLLC

By: */s/ Shannon R. Wilson*
Shannon R. Wilson (9933)

CERTIFICATE OF COMPLIANCE

I hereby certify that this PETITION FOR WRIT OF MANDAMUS complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the type-style requirements of NRAP 32(a)(6). This petition has been prepared in a proportionally spaced typeface using Microsoft Word, Times New Roman 14-point type. I further certify that this petition complies with the type-volume limitations of NRAP 32(a)(7) because, it is proportionally spaced, has a typeface of 14-point type, and contains **4,048** words, excluding the table of contents, disclosure, verification, and certifications. I have read this petition, and to the best of my knowledge, information, and belief, it is not frivolous or for an improper purpose.

This petition complies with all applicable Nevada Rules of Appellate Procedure, in particular NRAP 28(c)(1), which requires every assertion in this petition regarding matters in the record to be supported by a reference to the page of the transcript or appendix where the matter relied on is to be found. I understand that I may be subject to sanctions if the accompanying petition is not in conformity with the requirements of the Nevada Rules of Appellate Procedures.

DATED: May 1, 2024.

HUTCHISON & STEFFEN, PLLC

By: */s/ Shannon R. Wilson*
Shannon R. Wilson (9933)

CERTIFICATE OF SERVICE

I certify that this PETITION FOR WRIT OF MANDAMUS was served upon all counsel of record and the district court by electronically filing the document using the Nevada Supreme Court's electronic filing system and via U.S. mail to the following:

Honorable Bryce C. Duckworth, District Judge
Eighth Judicial District Court – Family Division, Department Q
Regional Justice Center
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Las Vegas, Nevada 89155

and

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Las Vegas, NV 89131
(702) 413-8768

Real Party In Interest in Proper Person

DATED: May 1, 2024.

By: */s/ Kaylee Conradi*

An employee of Hutchison & Steffen, PLLC