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1 **EPAO** Shannon R. Wilson (9933) 2 **HUTCHISON & STEFFEN, PLLC** Peccole Professional Park 3 10080 W. Alta Dr., Ste. 200 Las Vegas, NV 89145 4 (702) 385-2500 tel 5 (702) 385-2086 fax swilson@hutchlegal.com 6 Attorney for Plaintiff

In a Limited Scope Capacity

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EIGHTH JUDICIAL DISTRICT COURT – FAMILY DIVISION

CLARK COUNTY, NEVADA

Case No.: D-21-D

Dept No.: Q

Plaintiff,	
VS.	PLAINTIFF'S EX PARTE REQUEST FOI AN ORDER SHORTENING TIME
Defendant.	
Plaintiff by and through	ugh her attorney Shannon R. Wilson of Hutchison &
Steffen, PLLC, appearing in a limited service	ces capacity pursuant to EDCR 5.303 and that notice
of limited scope services filed on April 17, 2	2024 files her Ex Parte Request for an Order
Shortening Time pursuant to EDCR 5.606, a	and requests that this Court shorten the time in which
to hear Plaintiff's Motion to Continue Calen	ndar Call Pursuant to the Writ of Mandamus and
Opinion Issued January 30, 2025 and to Acc	commodate Schedule Conflict (hereinafter,
"Motion"), which was filed on February 5, 2	2025.
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PLAINTIFF'S EX PARTE REQUEST FOR AN OR	DER SHORTENING TIME - 1

Case Number: D-21-

This application is based on the pleadings and papers on file herein, the unsworn declarations of Shannon R. Wilson, attached to this request. DATED this 5th day of February, 2025. **HUTCHISON & STEFFEN, PLLC** /s/ Shannon R. Wilson Shannon R. Wilson (9933) Peccole Professional Park 10080 W. Alta Dr., Ste. 200 Las Vegas, NV 89145 (702) 385-2500 (702) 385-2086 swilson@hutchlegal.com Attorney for Plaintiff In a Limited Scope Capacity PLAINTIFF'S EX PARTE REQUEST FOR AN ORDER SHORTENING TIME - 2

UNSWORN DECLARATION¹

- 1. My name is Shannon R. Wilson, I am a Nevada-licensed attorney in good standing, a partner with the law firm Hutchison & Steffen, PLLC, and the attorney responsible for the limited scope matters in which the Firm represents in the matter styled Case No. D-21 D, lodged in the Eighth Judicial District Court, Clark County, Nevada. I am over the age of eighteen. I am competent to make this declaration and do so based on personal knowledge, except for those matters stated on information and belief, which I believe are true.
- 2. Plaintiff's Motion to Continue Calendar Call Pursuant to the Writ of Mandamus and Opinion Issued January 30, 2025 and to Accommodate Schedule Conflict was filed on February 5, 2025. The date and time set for hearing is not yet available.
- 3. There is an emergency that cannot wait until a hearing in the ordinary course. The emergency is that no hearing should be held until the district court has complied with the January 30, 2025, Writ of Mandamus, issued by the Supreme of Nevada to this Court. That Writ instructed this Court to "to vacate its order [filed April 9, 2024] denying the motion to close the hearing on the motion to modify custody and to reconsider that motion to close, applying the test outlined in Falconi."
- 4. It is Plaintiff's position that no hearing in this matter should be open to the public or press. The Media Request and Order filed February 29, 2024, was initially sought by Our Nevada Judges ("ONJ") for access to the February 29, 2024 trial, but the terms of the order, once signed permit media access to every hearing of the case until further Court Order. The same compelling interests that merited closure for that trial are present in all hearings on the matters currently pending before the Court in this case. The Nevada Supreme Court's opinion in *Nester*

¹ NRS 53.045 states, "Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under penalty of perjury, and dated . . ."

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v. Eighth Judicial Dist. Ct., 141 Nev. Adv. Op. 4 (2025), clarified Falconi v. Eighth Judicial Dist. Ct., 140 Nev. ---, 543 P.3d 92 (2024), and made clear the concerns articulated by Plaintiff are compelling interests that merit closure, as argued in Plaintiff's underlying motion. Holding an open hearing before the Court has undertaken the Falconi analysis and issues the Order that Plaintiff expects to close the hearing, would deprive Plaintiff of the very relief the Supreme Court of Nevada agreed she was entitled to have.

- 5. Additionally, Plaintiff's counsel who is retained in a limited scope to represent Plaintiff during trial has an unavoidable conflict with the February 11, 2025 date. Pursuant to the email correspondence, attached to Plaintiff's Exhibit Appendix filed February 5, 2022 as Exhibit 2, the undersigned, the Defendant, and his limited scope counsel are available other days and times of that week, except that Mr. Burton has a hearing on February 13, 2024 at 9:00 a.m. Id.
 - 6. Plaintiff's Ex Parte Request for an Order Shortening Time is made in good faith. Furthermore declarant sayeth naught.
- I, Shannon R. Wilson, declare under penalty of perjury that the foregoing is true and correct.

Executed on Fibruary 5, 2025 Oham Russian SIGNATURE