



1 **RPLY**

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11 **EIGHTH JUDICIAL DISTRICT COURT – FAMILY DIVISION**

12 **CLARK COUNTY, NEVADA**

13 [REDACTED]

14 Plaintiff,

15 vs.

16 [REDACTED]

17 Defendant.

18 Case No.: D-21-[REDACTED] D  
19 Dept No.: Q

20 **PLAINTIFF’S REPLY TO OUR**  
21 **NEVADA JUDGES, INC.**  
22 **OPPOSITION TO MOTION FOR**  
23 **RECONSIDERATION OF ORDER**  
24 **GRANTING CAMERA ACCESS**  
25 **AND COUNTERMOTION TO**  
26 **UNSEAL AND FOR LIMITED**  
27 **INTERVENTION FILED**  
28 **FEBRUARY 6, 2025 AND REQUEST**  
**TO DENY OR STRIKE THE SAME**

Date of Hearing: March 11, 2025  
Time of Hearing: 9:00 a.m.

PLAINTIFF’S REPLY TO OUR NEVADA JUDGES, INC. OPPOSITION TO MOTION FOR RECONSIDERATION OF ORDER GRANTING CAMERA ACCESS AND COUNTERMOTION TO UNSEAL AND FOR LIMITED INTERVENTION FILED FEBRUARY 6, 2025 AND REQUEST TO DENY OR STRIKE THE SAME - 1

1 Plaintiff [REDACTED] (hereinafter, “Plaintiff” or [REDACTED] by and  
2 through her attorney Shannon R. Wilson of Hutchison & Steffen, PLLC, appearing  
3 in a limited services capacity pursuant to EDCR 5.303 and that notice of limited  
4 scope services filed on April 17, 2024, files her Reply to Our Nevada Judges, Inc.  
5 (hereinafter, “ONJ”) Opposition to Motion for Reconsideration of Order Granting  
6 Camera Access and Countermotion to Unseal and for Limited Intervention filed  
7 February 6, 2025 and Request to Deny or Strike the Same (hereinafter, “ONJ’s  
8 Opposition & Countermotion”).  
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12 **ONJ’s Opposition & Countermotion should be struck or denied as**  
13 **procedurally improper.** Plaintiff knows of no statute or rule that permits this filing.  
14

15 By its title, it appears to be an opposition to [REDACTED] motion for  
16 reconsideration filed nearly one (1) year ago on March 14, 2024. If it is that, then  
17 as an opposition to a year-old motion for reconsideration that was decided by an  
18 order filed on April 9, 2024, it is an improper and moot filing. Moreover, ONJ  
19 already filed an opposition to that motion on March 15, 2024, which did not include  
20 a countermotion to unseal or intervene. Consequently, it is also a countermotion that  
21 is not related to the same subject matter as the underlying motion. *See* EDCR  
22 5.503(c).  
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28 PLAINTIFF’S REPLY TO OUR NEVADA JUDGES, INC. OPPOSITION TO MOTION FOR  
RECONSIDERATION OF ORDER GRANTING CAMERA ACCESS AND COUNTERMOTION TO UNSEAL  
AND FOR LIMITED INTERVENTION FILED FEBRUARY 6, 2025 AND REQUEST TO DENY OR STRIKE  
THE SAME - 2

1 By its introduction, ONJ's Opposition & Countermotion is a response to Ms.  
2 [REDACTED] ex parte request for an order shortening time filed on February 5, 2025.  
3  
4 ONJ's Opposition & Countermotion does not oppose the subject matter of the ex  
5 parte request which is to advance a hearing date. Plaintiff is unaware of any statute  
6 or procedure that permits an opposition to the substance, let alone a *countermotion*,  
7  
8 to an ex parte request for an order shortening time.

9  
10 By its substance, ONJ's Opposition & Countermotion appears to be an  
11 attempt to brief the Court on its interpretation of *Nester v. Eighth Judicial Dist. Ct.*,  
12 141 Nev. Adv. Op. 4 (2025), which this Court had not requested as of the date of  
13 ONJ's filing. Since ONJ's filing on February 6, 2025, this Court, on February 13,  
14 2025, filed an Order re Writ of Mandamus that vacated the Court's April 9, 2024  
15 Order and stated that at the time of the Calendar Call, the Court would entertain  
16 argument regarding Plaintiff's burden to demonstrate that closure serves a  
17 compelling interest, there is a substantial probability that, in the absence of closure,  
18 this compelling interest could be harmed, and there are no alternatives to closure that  
19 would adequately protect the compelling interest.  
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24 As ONJ points out in each of its filings, ONJ and [REDACTED] are not generally  
25 adversaries, but they are at odds on the issue of an open hearing, and now too, they  
26 are apparently at odds on the issue of unsealing records that are sealed pursuant to

1 NRS 125.110 and ONJ's request to intervene. These are brand new issues, in so far  
2 as ONJ is concerned.<sup>1</sup> As such they are not related to the subject matter of Ms.  
3  
4 [REDACTED] underlying moving papers; therefore this is an improper countermotion  
5 pursuant to EDCR 5.503(c), and [REDACTED] should not be prejudiced because she  
6  
7 lacks the resources to respond to a well-heeled media organization that has legal  
8  
9 counsel on retainer, capable of generating sophisticated First Amendment arguments  
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11 within twenty-four hours of her filings. If the Court is disinclined to strike or deny  
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13 ONJ's Opposition & Countermotion, then [REDACTED] should be given time and  
14  
15 opportunity to find the assistance of counsel who can represent her and her position  
16  
17 or to do so herself if she cannot.

18  
19 Based on the foregoing, Plaintiff [REDACTED] respectfully requests this  
20  
21 Court strike or deny Our Nevada Judges improper Opposition and Countermotion  
22  
23 filed February 6, 2025. [REDACTED] also requests the Court consider, pursuant to  
24  
25 NRS 18.010(2)(b) an award of attorneys' fees and costs to [REDACTED], incurred in  
26  
27 connection with this Reply whereas there is no statute or rule that permits ONJ's  
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29 filing, at least not as it was presented, and as such it was brought without reasonable

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<sup>1</sup> ONJ filed a motion to unseal records on February 23, 2024, but that motion was withdrawn on March 9, 2024.

1 grounds. If the Court is inclined to award attorneys' fees and costs to [REDACTED]  
2 then a *Brunzell* memorandum shall be filed upon request.  
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4 DATED this 13<sup>th</sup> day of February, 2025.  
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8 */s/ Shannon R. Wilson*

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28 PLAINTIFF'S REPLY TO OUR NEVADA JUDGES, INC. OPPOSITION TO MOTION FOR  
RECONSIDERATION OF ORDER GRANTING CAMERA ACCESS AND COUNTERMOTION TO UNSEAL  
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