

LUKE A. BUSBY, ESQ.
SBN 10319
316 California Ave.
Reno, Nevada 89509
775-453-0112
luke@lukeandrewbusbyltd.com
Attorney for Our Nevada Judges

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Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

ALEXANDER M FALCONI,
Petitioner,
vs.
EIGHTH JUDICIAL DISTRICT COURT
OF THE STATE OF NEVADA IN AND
FOR THE COUNTY OF CLARK; AND
THE HONORABLE CHARLES
HOSKIN, DISTRICT COURT JUDGE,
Respondents,

TROY A MINTER, JENNIFER R
EASLER,
Real-Parties in Interest.

Case No.: 85195

REPLY TO RESPONSE TO MOTION

COMES NOW, Petitioner Alexander Falconi d/b/a/ Our Nevada Judges, by and through the undersigned counsel, and hereby files the following Reply to the March 8, 2023 Response by the American Academy of Matrimonial Lawyers (“AAML”) to the March 6, 2023 Motion filed by Our Nevada Judges.

MEMORANDUM OF POINTS AND AUTHORITIES

The Motion should be granted. AAML’s Response admits in two separate footnotes that counsel Marshall Willick knew before oral argument that Real-Party in Interest Easler supported Petitioner’s position, not AAML’s. Response to Mot. at 3 n. 2, 4–5 n.3. Yet, at the March 2, 2023 argument before this Court, Mr. Willick represented that he was “authorized to speak” for both Real-Parties in interest Mr. Minter and Ms. Easler. At oral argument, when Mr. Peterson of the American Civil Liberties Union objected to this representation by Mr. Willick, Mr. Willick stated, “I have received that authorization from both counsel.”

AAML’s claim that the motion is “baseless and meaningless” is wrong. The conclusion any reasonable jurist would draw when an attorney claims that they “speak for” a party is that the attorney is representing that party in the proceeding and is arguing on that party’s behalf. *See Shores v. United States*, 80 F.2d 942, 948 (9th Cir. 1935)(“...attorneys are officers of the court, but this gives them no right

to speak for parties for whom they are not counsel, or to testify about them if not sworn as witnesses.") To claim to represent a party that the attorney knows is opposed to his position harms people who have a substantive interest at stake and undermines foundational principles of the American legal system in that lawyers are obligated to: (1) defend the interests of the people that they claim to represent and (2) not make false claims to the courts they appear before.

Further, the Response is devoid of any support for the factual assertions it contains. It is full of irrelevant argument about the merits of the Petition. Thus, not only should the Motion be granted, but the Response should also be stricken.

As indicated in Ms. Easler's declaration, Ms. Easler did not have the financial means to afford representation before the Supreme Court – and Mr. Willick, a well-known and experienced family law attorney, took it upon himself to steal Mr. Easler's voice. Circumstances such as the one presented are exceedingly rare, extraordinary, and troubling, and in the Petitioner's view, require corrective action from this Court.

WHEREFORE, Petitioner moves that the Court find that counsel for the AAML was not authorized by Real-Party in Interest JENNIFER EASLER to participate in the March 2, 2023 oral argument on her behalf, correct the record

to the extent Mr. Willick claimed to speak for Ms. Easler during that proceeding, and impose any other remedy the Court finds appropriate under the circumstances.

DATED this: Friday, March 10, 2023

By: /s/ Luke Busby, Esq.
LUKE A. BUSBY, ESQ.
SBN 10319
316 California Ave.
Reno, Nevada 89509
775-453-0112
luke@lukeandrewbusbyltd.com

Certificate of Service

I, Luke Busby, certify that I served a true and correct copy of this *Motion*
by electronic service as follows:

Frank Toti
Shann Winesett
Fred Page
Debra Bookout
Luke Busby
Marshal Willick

And via US Mail to:

The Hon. Charles Hoskin
Eighth Judicial District Court
601 N. Pecos Rd.
Las Vegas, NV 89101

SERVED this: Friday, March 10, 2023

By: /s/ Luke Busby, Esq.
LUKE A. BUSBY, ESQ.
SBN 10319
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Reno, Nevada 89509
775-453-0112
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