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**DISTRICT COURT
CLARK COUNTY, NEVADA
FAMILY DIVISION**

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<p>9 XXXXXXXXXXXXXXXXXXXX,</p> <p style="padding-left: 100px;">Plaintiff,</p> <p>10 vs.</p> <p>11 XXXXXXXXXXXX;</p> <p style="padding-left: 100px;">Defendant.</p> <p>12 _____ /</p>	<p>CASE NO: D-21-XXXXXXXXXX-D</p> <p>DEPT NO: Q</p> <p>NO HEARING REQUESTED</p>
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14 NOTICE: YOU MAY FILE A WRITTEN RESPONSE TO THIS MOTION WITH THE
15 CLERK OF THE COURT AND PROVIDE THE UNDERSIGNED WITH A COPY OF
16 YOUR RESPONSE WITHIN 14 DAYS OF YOUR RECEIPT OF THIS MOTION.
17 FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT
18 WITHIN 14 DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE
19 REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT A HEARING
20 PRIOR TO THE SCHEDULED HEARING DATE.

MOTION TO UNSEAL

21 COMES NOW, Our Nevada Judges, Inc., a Nevada non-profit corporation, by
22 and through the undersigned counsel, and hereby files a motion to unseal.

23 This motion is based upon the following memorandum of points and
24 authorities, and the exhibits attached hereto.

MEMORANDUM OF POINTS AND AUTHORITIES

25 A non-party news reporter may file a motion to unseal. SRCR 4(2).
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1 The entire case file is sealed, in direct violation of SRCR 3(5)(c) (“[u]nder no
2 circumstances shall the court seal an entire court file.”)

3 A camera access request is pending. SCR 230(1). The Parties demand alone is
4 insufficient to justify closing the court. *Falconi v. Eighth Jud. Dist. Ct.*, 140 Nev.,
5 Advance Op. 8 (2024). Sealing the entire file interferes with a news reporter’s ability
6 to monitor a case, including titles of filings, and upcoming hearing dates and times.
7

8 At this juncture, ONJ requests this Court vacate any sealing orders in excess
9 of the Supreme Court’s mandate under SRCR 3(5)(c). It is especially problematic
10 that the sealing orders themselves have been sealed, as it deprives the press of the
11 specific basis upon which this Court has imposed this extensive seal and is
12 expressly forbidden under SRCR 3(5)(vi).
13

14 **NRS 239B.030(4) AFFIRMATION**

15 Pursuant to NRS 239B.030 the undersigned hereby affirms that this document
16 does not contain the social security number of any person.
17

18 **DATED** this Feb 23, 2024

19 By: /s/ Luke Busby
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23 Reno, Nevada 89509
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26 *Attorney for the Our Nevada Judges*
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DECLARATION OF ALEXANDER FALCONI

I, Alexander M. Falconi, declare that I have read the forgoing *Motion* and that the contents are true and correct of my own personal knowledge, except for those matters I have stated that are not of my own personal knowledge, but that I only believe them to be true, and as for those matters, I do believe they are true.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this Feb 23, 2024



Alexander M. Falconi
205 N. Stephanie St.
Suite D#170
Henderson, NV 89074
Our Nevada Judges
admin@ournevadajudges.com

CERTIFICATE OF SERVICE

I certify that on the date shown below, I caused service to be completed of a true and correct copy of the foregoing document by:

_____ personally delivering;

_____ delivery via Reno/Carson Messenger Service;

_____ sending via Federal Express (or other overnight delivery service);

_____ depositing for mailing in the U.S. mail, with sufficient postage affixed thereto;

or,

delivery via electronic means (fax, eflex, NEF, etc.) to:

Cody Gamble

Shannon Wilson, Esq.

DATED this Feb 23, 2024

By: /s/ Luke Busby