



**OBJ**

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

In the Matter of the Guardianship of:

CASE NO: G-24-[REDACTED]-M  
DEPT. NO.: U

[REDACTED]  
A Proposed Protected Minor

**OBJECTION TO BROADCAST, RECORD, AND PHOTOGRAPH OR  
TELEVISION THE HEARING**

*Appearance via Simultaneous Audiovisual Transmission Equipment*

COMES NOW, Petitioners, [REDACTED]

[REDACTED] by and through their respective counsel, JASON NAIMI, ESQ., and ILAN  
ACHERMAN, ESQ., of NAIMI MULLINS LAW GROUP, and hereby submits their  
Objection to Broadcast, Record, and Photograph or Television the Hearing.

Petitioners respectfully move this Court to enter the following:

1. An Order disallowing Alex Falconi and Our Nevada Judges' request to  
Broadcast, Record, Photograph or Television the Hearing; and
2. For such other relief deemed just and equitable by the court under the  
circumstances.

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1 This Objection is made and based upon the attached Points and Authorities, as  
2 well as any exhibits and affidavits attached hereto, all papers and pleadings on file  
3 herein, and any oral argument adduced at the hearing of this matter.

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5 DATED this 19<sup>th</sup> day of July 2024

6 NAIMI MULLINS LAW GROUP

7  
8 /s/Ilan Acherman

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20 Attorneys for Petitioner, [REDACTED]  
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**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. FACTUAL BACKGROUND AND ALLEGATIONS**

At issue in this case is the guardianship of [REDACTED], a seven (7) month old baby girl, whose parents were tragically murdered on April 8, 2024. The murder followed years of heightened conflict between [REDACTED] mother, Ashley Prince, and her ex-husband, Dylan Houston, as they were engaged in a highly contested custody matter involving [REDACTED] half-siblings. [REDACTED] is an innocent victim in all of this, and Mr. Falconi would make a spectacle of the necessary proceedings involving [REDACTED] brother, her grandparents, and the initial Petitioners to this case, [REDACTED], who just want to make sure [REDACTED] is well cared for.

This case will necessarily involve disputes between members of [REDACTED] family and those who just want the best for her. Those disputes will inevitably lead to testimony and argument, and will likely include emotional, and at times perhaps less than flattering, moments involving [REDACTED] family.

No one has sought to completely seal this matter. The public, including the press and Mr. Falconi's Our Nevada Judges, will have access to all pertinent information regarding these proceedings. That will include access to filings, decisions, court orders, and even transcripts of proceedings if they so choose. What would be detrimental to [REDACTED], however, is having the faces of her potential guardians plastered all over the internet, possibly placing [REDACTED] guardians, and [REDACTED] herself, at risk.

Just as detrimental to [REDACTED] best interests would be the very real likelihood of her guardians, her family, her brother and grandparents, possibly fighting in a courtroom, all on the internet, forever. How tragic for [REDACTED] having lost her parents, to later – five, six, ten years on – have her school friends showing her videos on YouTube of her grandparents possibly talking badly about her brother or her

guardians, all in color and streamed for the world to see. Petitioners ask that the Court protect [REDACTED] from that reality.

## II. Legal Analysis

### A. There are extraordinary Circumstances in this case overcoming the Press' Interest.

There exist competing interests between litigants' privacy rights in family law proceedings and the press' and the public's interest to access court proceedings. *Falconi, v. Eight Judicial District Court*, 140 Nev., Advanced Opinion 8 (2024). The public's right to access to those proceedings can be precluded where the Court finds extraordinary circumstances warranting such preclusion.

"In any other proceedings in Nevada, before a district court can close those proceedings "(1) the party seeking to close the hearing must advance an overriding interest that is likely to be prejudiced; (2) the closure must be no broader than necessary to protect the overriding interest; (3) the trial court must consider reasonable alternatives to closing the proceedings; and (4) the trial court must make findings adequate to support the closure."

*Feazell v. State*, 11 Nev. 1446, 1449, 906 P.2d 727, 729 (1995); *Falconi, v. Eight Judicial District Court*, 140 Nev., Advanced Opinion 8 (2024). As the *Falconi* Court pointed out, the value of openness lies in ensuring confidence in the public that standards of fairness are being observed. *Id.* at 97. Any deviation from complete openness should ensure that those interests are addressed.

In this present case, [REDACTED]'s safety and her future emotional and psychological well-being rely on the Court providing some minimal protections. In this case, [REDACTED] privacy and safety interests can be protected, while ensuring that the public's interest the openness of proceedings are also preserved.

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1       **1. The party seeking to close the hearing must advance an overriding interest**  
2       **that is likely to be prejudiced.**

3       [REDACTED] safety and well-being is an overriding interest in this case. [REDACTED] did  
4 not choose to be the subject of these proceedings, she has been thrust into this by the  
5 tragic death of her parents. Mr. Falconi asks that he be able to broadcast her family's  
6 dispute on the internet, subjecting [REDACTED] to those images now and into the future.

7       Importantly, there is a safety concern in this case, both for [REDACTED] and for the  
8 [REDACTED]. Many of those fears have already been articulately explained by [REDACTED]  
9 grandparents and include the fear of additional violence as [REDACTED]  
10 continue the custody dispute with Dylan Houston. [REDACTED] fear being brought into  
11 that conflict, and they have done everything they can to separate themselves and  
12 [REDACTED] from the possibility of that conflict affecting their lives. Having their faces  
13 plastered in the media will add nothing to advance the public's interest in ensuring the  
14 access to these proceedings. The same information regarding these proceedings can  
15 be readily gleaned from transcripts, filings, and the Court Record, without subjecting  
16 [REDACTED] and her caretakers to public harassment or the safety concerns that being  
17 publicly recognizable will surely bring.

18       There is also a concern about [REDACTED] emotional and psychological well-being  
19 well into the future. These videos, posted on the internet, will be there forever. When  
20 [REDACTED] is six, ten, sixteen years old, she or her friends will have easy and ready access  
21 to these videos where her family's disputes have been broadcast. A simple search for  
22 the "Prince" name will present [REDACTED] with those videos, which will show her own  
23 grandparents' testimony, subjecting [REDACTED] to the possibility of further harassment  
24 and possible ridicule. [REDACTED] has already lost her parents; we should not add to that  
25 by turning these proceedings into a spectacle that will haunt [REDACTED] into the future.

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1       **2. The closure must be no broader than necessary to protect the overriding**  
2       **interest.**

3       Petitioners ask only that the parties' contact information and video of these  
4 proceedings be maintained private. The public will have access to all other  
5 information, including filings, briefs, court orders, and even transcripts of  
6 proceedings. All information necessary for the public to ensure that "standards of  
7 fairness are being observed" and that "procedures are being followed and that  
8 deviations will become known," will be available without the need for video  
9 recordings to be plastered all over the internet.

10       **3. The trial court must consider reasonable alternatives to closing the**  
11       **proceedings.**

12       There is no objection that the documents in this case be made publicly available.  
13 The objection is to prevent further exploitation of this family's tragedy in even greater  
14 detail by the media's salacious intent to capture sensationalizing headlines and  
15 images. Those involved in this tragedy need not have their most private and vulnerable  
16 moments on public display. The documents would be available, allowing the public  
17 to be kept abreast of the guardianship of baby [REDACTED]. The accessibility will allow an  
18 alternative means of information to be obtained, while still allowing the lives of those  
19 involved to remain private. The public has speculated on the deaths of [REDACTED]  
20 parents, the circumstances that led to it, how it could have been avoided, and whether  
21 similar situations could be avoided in the future. [REDACTED] is already growing up within  
22 this paradigm. It would be beneficial to her now, and as she gets older, to have her  
23 story contained as much as possible without depriving the public of information.  
24 Therefore, the Court should deny the right of these proceedings to become public.

25       **4. The trial court must make findings adequate to support the closure.**

26       All documents will be available in this case, (including this one), and therefore,  
27 the Court's findings can showcase the alternative means of information. The public is  
28 not being denied information nor is this process taking place in secrecy. Rather, seeing

1 the faces and emotions of those involved are not integral facts to which the media and  
2 the public need to be privy. Therefore, the Court should deny the right of these  
3 proceedings to become public.

### 4 III.CONCLUSION

5 The Court should deny the request to allow the media presence during the  
6 hearing of the instant case. This is an extraordinary matter with a seven (7) month-old  
7 baby, who, as a result of a tragedy, became an orphan. [REDACTED] parents were tragically  
8 murdered by the grandfather of her half-siblings. [REDACTED] will grow up in an  
9 environment of hurt, knowing the circumstances that have made her an orphan. The  
10 entire legal community was affected by the untimely death of [REDACTED] parents. The  
11 media spared no details in their speculations about these events. Undersigned counsel  
12 does not object to the *documents* in this case being made public, but there is no reason  
13 for videos of this family's dispute, showing the faces of all parties involved in this  
14 case, to be broadcast for the world to see, to be maintained on the internet for all time.

15 A baby's safety and well-being are at issue in this case, and provide the Court  
16 with an overriding basis to maintain some level of privacy for this child and her  
17 caretakers. In this case, overriding privacy interest can be balanced with the public's  
18 right to access simply by maintaining contact information and video recordings  
19 private, while keeping all other filings and records in this case open to the public.

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1 The Court should deny the right of these proceedings to become public. Based  
2 upon the foregoing, Petitioners request the Court enter the following:

- 3 1. An Order denying Alex Falconi's request to Broadcast, Record,  
4 Photograph or Televisé the Hearing; and  
5 2. For such other relief deemed just and equitable by the court under the  
6 circumstances.

7 DATED this 19<sup>th</sup> day of July 2024

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