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IN THE SUPREME COURT OF THE STATE OF NEVADA

ESTATE OF MICHAEL DAVID ADAMS, BY AND THROUGH HIS MOTHER JUDITH ADAMS, INDIVIDUALLY AND ON BEHALF OF THE ESTATE, Appellant, v. SUSAN FALLINI, Respondent.	Supreme Court No.: 68033 District Court Case No.: CV24539 **REPLY TO RESPONDENT'S RESPONSE TO APPELLANT'S MOTION TO TRANSMIT VIDEO EXHIBIT**

Appellant Judith Adams, Individually and on Behalf of The Estate of Michael David Adams ("Appellant"), by and through her attorney of record, John P. Aldrich, Esq. of the Aldrich Law Firm, Ltd., hereby respectfully submits a Reply to Respondent's Response to Appellant's Motion to Transmit Video Exhibit.

In Defendant's Response, Defendant provides no substantive reason why the video at issue is irrelevant. Rather, the two points raised by Defendant are: (1) that "court attendance should be encouraged" because an open court system "is one of the three pillars holding up our freedoms and rights" (Response, p. 1, ls. 21-26); and (2) a citation to the hearing transcript that allegedly shows the Judge was not influenced by the attendance at the hearing of Defendant's "supporters" (see p. 2, ls. 1-10).

First, Plaintiff also believes in the open court system. It is worth noting, however, that Defendant's many "supporters" did not attend a single hearing (before or since), except for the July 28, 2014 hearing. If Defendant disputes Plaintiff's

interpretation of the effect of Defendant's "supporters" on the district court on July 28, 2014, Defendant should not object to this Court reviewing the video of that hearing and making its own determination.

Second, starting on page 2 at line 16, and continuing until nearly the end of the brief, Defendant claims that the video is irrelevant to this appeal because the August 6, 2014 Order was not timely appealed. However, as Defendant has done repeatedly throughout this litigation, Defendant has ignored this Court's prior ruling on an issue already specifically addressed by this Court. On December 2, 2015, in its Order Reinstating Briefing, this Court stated:

> [W]e conclude that the appeal is not limited to the order entered April 17, 2015, and that this court has jurisdiction to consider challenges to the order entered August 6, 2014, as an interlocutory order. *See American Ironworks & Erectors, Inc. v. North Am. Constr. Corp.*, 248 F.3d 892, 897 (9th Cir. 2001) (noting that "a party may appeal interlocutory orders after entry of a final judgment because those orders merge into that final judgment"); *Consol. Generator-Nev., Inc. v. Cummins Engine Co., Inc.*, 114 Nev. 1304, 1312, 971 P.2d 1251, 1256 (1998) (noting that this court may review an interlocutory order in the context of an appeal from a final judgment).

(Order Reinstating Briefing, p. 1.)

In the end, the interpretation of the effect Defendant's "supporters" had on the district court at the July 28, 2014 hearing can be determined by this Court by reviewing the video of the July 28, 2014 hearing. It is clearly relevant to the issues on appeal.

DATED this 23rd day of February, 2016.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing **REPLY TO RESPONDENT'S RESPONSE TO APPELLANT'S MOTION TO TRANSMIT VIDEO EXHIBIT** was filed electronically with the Nevada Supreme Court on the 23rd day of February, 2016.

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to:

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