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Electronically Filed  
Nov 01 2017 09:24 a.m.  
S.C. No. 17-7501  
D.C. No. 17-7501  
Elizabeth A. Brown  
Clerk of Supreme Court

Respondent.

The VIPI Parties do not oppose consolidation of this appeal (72778) with the Abrams Appeal (73838). Rather, the VIPI Parties oppose consolidation of this and the Abrams Appeal with the Saiter Appeal (72819), knowing that the Saiter Appeal provides the background revealing their extortion and defamation operation, which

1 will help inform the proper disposition of the two defamation/anti-SLAPP appeals  
2 (72778 and 73838).  
3

4 As noted in both the *Motion to Consolidate* and in the *Response to Order to*  
5 *Show Cause*, the facts underlying the Saiter Appeal set the events in all three appeals  
6 in motion. Attorney Schneider's enlistment of Sanson to publish the Saiters' divorce  
7 hearing on the internet and launch a defamation campaign against attorney Abrams  
8 (and then against attorney Willick) caused all three cases to proceed to the current  
9 appeals. Sanson cannot, and does not, deny that the cast of characters in all three  
10 cases overlap almost completely.  
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13  
14 The VIPI parties' first contention (at 3-4) that this Court "lacks jurisdiction"  
15 to determine whether district courts may issue orders enforcing court rules protecting  
16 minor children from exposure to court proceedings is incorrect. This Court has  
17 "plenary authority" to review, supervise, and direct the conduct of district court  
18 judges, the interpretation and application of court rules, and the jurisdiction of the  
19 district courts to enforce them.<sup>1</sup>  
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24 <sup>1</sup> See, e.g., *Goldberg v. Eighth Judicial Dist. Court*, 93 Nev. 614, 618, 572 P.2d  
25 521, 523 (1977) (Gunderson, J., concurring); *Farmers Ins. Exch. v. Young*, 108 Nev.  
26 328, 330, 832 P.2d 376, 377 (1992); *Leven v. Frey*, 123 Nev. 399, 402, 168 P.3d 712,  
27 714 (2007); *Davis v. Beling*, 128 Nev. 301, 321, 278 P.3d 501, 515 (2012).  
28

1       The VIPI parties' second contention (at 4-7), that the appeal was not  
2 "perfected" because non-parties to the action below were not served with the notice  
3 of appeal is nonsense; nothing in this Court's rules or jurisprudence requires service  
4 of an appeal on a non-party.  
5

6  
7       Regardless, the VIPI parties are obviously aware of the Saiter Appeal and the  
8 issues it presents. If anything, their argument underscores why consolidation is  
9 warranted: each party to each case is compelled to use/reference/respond to evidence,  
10 arguments, and results in the other cases, and as noted, the people involved are the  
11 same.<sup>2</sup>  
12

13  
14       Addressing The VIPI parties's third point (at 7-8), not much can be said as to  
15 "judicial economy" except that as The VIPI parties concedes, appeals arising from a  
16 "common set of facts" are most economically decided together. It can hardly be more  
17 "economical" for this Court to hear from the same people about the same facts in two  
18 (or three) appeals rather than one.  
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24       <sup>2</sup> As discussed in the show cause proceedings, both Brandon Saiter and Tina  
25 Saiter are in agreement that their case should not be splashed across the internet, but  
26 attorney Schneider, having abandoned any pretense of representing Tina's interest,  
27 is filing documents in the Saiter Appeal for his own ends, and contrary to those of his  
28 client.

1           The VIPI parties' filing (at 8-9) purports to instruct this Court as to what issues  
2 and reviews it may (and may not) consider and rule upon in a consolidated appeal.  
3  
4       The expressed concern is misplaced. Disposition of all three appeals will necessarily  
5 involve a review of the allegations made in each case and the propriety of the  
6 contradictory rulings now on appeal. The fact that findings in the Abrams Appeal and  
7 the Saiter Appeal will be considered does not, without more, weigh against  
8 consolidation.  
9

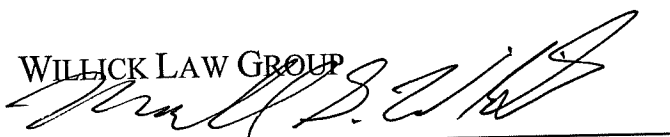
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11           Finally (at 9-10), The VIPI parties attempts the gymnastic feat of trying to  
12 convince this Court that it should not review the judicial findings as to Sanson's illicit  
13 and corrupt acts in a case that *he inserted into this appeal*. As noted in the *Motion*  
14 *to Consolidate*, The VIPI parties raised discussion of *Ansell* in their opening brief,  
15 complaining that they had "nothing to do with it," even though Sanson was found to  
16 have deliberately interjected himself into the case as part of a corrupt effort to alter  
17 its results – precisely the behavior at issue in the Saiter Appeal. It defies common  
18 sense for the VIPI parties to assert that this Court must note their filings in *Ansell* but  
19 not the district court's decision.  
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1 In sum, The VIPI parties's filings are an attempt to prevent this Court from  
2 seeing the entirety of the factual situation while ruling on the law applicable to  
3 portions of it. It should be seen for what it is, and rejected accordingly.  
4

5 **WHEREFORE**, Brandon Saiter requests that this Court disregard the "partial"  
6  
7 Opposition and grant the Motion to Consolidate in its entirety.

8 **DATED** this 30th day of October, 2017.

9  
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## CERTIFICATE OF SERVICE

Pursuant to NRCp 5(b), I certify that I am an employee of the WILICK LAW GROUP and that on this 30<sup>th</sup> day of October, 2017, documents entitled *Reply to Response to Order to Show Cause* were filed electronically with the Clerk of the Nevada Supreme Court, and therefore electronic service was made in accordance with the master service list as follows, to the attorneys listed below at the address, email address, and/or facsimile number indicated below:

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An Employee of the WILICK LAW GROUP

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