

1 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

2 * * * * *

3 JENNIFER V. ABRAMS and
4 THE ABRAMS & MAYO LAW FIRM,

5 Appellant,

6 vs.

7 STEVE W. SANSON; AND VETERANS IN
8 POLITICS INTERNATIONAL, INC;

9 Respondent.
10 _____

S.C. NO: 73838
D.C. NO: 75834
Electronically Filed
Aug 09 2018 01:48 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

11 **MOTION TO CONSOLIDATE APPEALS**

12 Appellants Jennifer V. Abrams and the Abrams & Mayo Law Firm, by and
13 through their attorney, Marshal S. Willick, Esq., of the WILICK LAW GROUP, hereby
14 moves this Court for a consolidation of appeals No. 73838 and 75834 for the purpose
15 of briefing and oral argument.
16

17 This motion is based upon the pleadings and papers on file herein, and the
18 following points and authorities.
19

20 **POINTS AND AUTHORITIES**

21 NRAP 3(b)(2) provides:

22 (2) When the parties have filed separate timely notices of appeal, the
23 appeals may be joined or consolidated by the court upon its own motion
24 or upon motion of a party.
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1 This Court has frequently consolidated appeals growing out of the same fact pattern
2 or involving common issues of law.¹

3 Now pending before this Court are two appeals growing out of the same case,
4 and from the same ruling at the same hearing; the only difference is that it took one
5 of the parties many months later than the other to submit an order from the hearing,
6 leading to two separate appeal filings. The cast of characters involved in the appeals
7 – as parties and as counsel – are the same. The facts and law involved are identical.
8

9 Both cases grow out of the facts of the same district court case (No. A-17-
10 749318-C), in which Jennifer Abrams and the Abrams and Mayo Law Firm are the
11 plaintiffs, and Louis Schneider, Law Offices of Louis C. Schneider, LLC, Steve W.
12 Sanson, and Veterans in Politics International, Inc are the defendants.
13

14 The Abrams firm documented assorted improprieties by Attorney Schneider in
15 a *Motion for Sanctions and Attorney's Fees* (“Sanctions Motion”) alleging that he
16 was responsible for delaying the resolution of the case and fueling unnecessary
17 litigation for his own personal and improper motives, including billing and discovery
18 improprieties, claiming to continue representing his client after being fired,
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25 ¹ See, e.g., *Mack-Manley v. Manley*, 122 Nev. 849, 138 P.3d 525 (2006); *A*
26 *Minor v. Juvenile Div. of Seventh Judicial Dist. Court*, 97 Nev. 281, 630 P.2d 245
27 (1981); *Huckabay v. NC Auto Parts, LLC*, 130 Nev. ___, 322 P.3d 429 (Adv. Opn.
28 23, Mar. 27, 2014); *Gilman v. Gilman*, 114 Nev. 416, 956 P.2d 761 (1998).

1 obstructing resolution of the case against her wishes, and other inappropriate behavior
2 including “sexually suggestive conduct” toward his client.²

3 Attorney Schneider responded with a written threat that if the motion was not
4 withdrawn he would oppose it “and take additional action beyond the opposition.”
5

6 When the Abrams firm did not withdraw the Sanctions Motion, Attorney
7 Schneider followed through on his threat by requesting a copy of the video of a
8 closed hearing in the case, and providing it to Steve Sanson of “Veterans In Politics
9 International, Inc.” (“Sanson”) to post along with commentary attacking the integrity
10 of Attorney Abrams and her law firm.³
11

12 Sanson claims to run an “advocacy” group but actually runs an internet-based
13 extortion and defamation service intended to alter political races and judicial
14 proceedings – essentially a modern day “protection racket,”⁴ as found in a detailed
15 formal court order by the Hon. Bryce Duckworth.⁵
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19 ² All citations to the record in the *Saiter* matter are set out in original writ
20 petition in that case.

21 ³ The Sanson commentary invited viewers to watch that portion of the video
22 where Judge Elliott made unfounded accusations against the ethics of the Abrams
23 firm, but did not mention the judge’s retraction of those comments an hour later after
learning the facts.

24 ⁴ Sanson effectively advertises it as such, having posted that he and his
25 organization are available: “When people needed someone [*sic*] to get dirty so they can
26 stay nameless, we do it without hesitation.”

27 ⁵ See Exhibit 1, *Order of Recusal* filed September 5, 2017, at 5.
28

1 Attorney Schneider's client, Tina, did not want videos from her divorce posted
2 on the internet; when she questioned him about it, Attorney Schneider sent her email
3 pretending that he did not know how it got posted, which Tina then copied to her
4 husband, Brandon.
5

6 Judge Elliott never confirmed from whom she got the out-of-court false
7 assertions about the ethics of the Abrams firm; it was apparently either Schneider or
8 Sanson. In addition to withdrawing her preliminary remarks by the end of the hearing
9 in question and admitting she had been mistaken as to all of her initial statements,
10 Judge Elliott sent a note days later telling Attorney Abrams that "I think you are one
11 of the most ethical attorneys that I know!"
12

13 By about October 3, Sanson posted the video of the closed *Saiter* hearing video
14 on Youtube and a link to the video was emailed to many thousands of third parties not
15 involved in the case. An advertisement for Attorney Schneider's law office then
16 appeared as an advertisement on Sanson's Facebook page.
17

18 Sanson, with Attorney Schneider's apparent assistance, initiated a series of
19 "smear campaigns" against Attorney Abrams via "email blast," Youtube, numerous
20 Facebook pages, Twitter accounts, Google+ accounts, and on various blogs and
21 Facebook "groups," etc., re-posting the embedded *Saiter* hearing video again and
22 again thereafter. While Sanson has publicly admitted receiving some payment from
23 Schneider at the time, it is unknown how much Schneider paid Sanson for these
24 "services."
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1 Attorney Abrams filed suit against Attorney Schneider and Sanson based on
2 Schneider's use of Sanson to try to improperly influence the court and extort
3 concessions in the *Saiter* divorce, and sought an injunction against the ongoing
4 defamation.
5

6 When Sanson discovered the personal relationship between Attorney Abrams
7 and undersigned counsel ("Attorney Willick") and became acquainted with another
8 divorce litigant seeking to improperly influence a judge in an ongoing case (Doug
9 Ansell), he expanded the defamation campaigns to include Attorney Willick, falsely
10 accusing him of multiple crimes and other wrongs. This led to a separate defamation
11 complaint against Sanson, also seeking damages and injunctive relief.
12

13 During preliminary motion hearings in that case, Judge Thompson denied
14 Sanson's "anti-SLAPP" motion and Sanson appealed the denial. That action, No.
15 72778 is separately on appeal and now set for oral argument.
16

17 In the Abrams case, both Sanson and Schneider filed motions to dismiss under
18 the "anti-SLAPP" statutes. During preliminary motion hearings, Judge Leavitt –
19 before permitting any discovery into Schneider's payments to Sanson or the scheme
20 between Attorney Schneider and Sanson to improperly influence the divorce court
21 and to extort concessions in the *Saiter* divorce case – dismissed the suit, finding that
22 the postings against Attorney Abrams were insufficiently defamatory to proceed.
23 Each defendant was to file an order from that hearing.
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1 The order granting Sanson's motion to dismiss was filed on July 24, 2017,⁶ and
2 the appeal from that order was filed August 21. It was assigned to the settlement
3 program on September 1, and the conference was held on January 17, 2018. Briefing
4 was reinstated on February 7, suspended on April 5, and reinstated on July 2, 2018.
5

6 The order granting Schneider's motion was not filed, however, until April 24,
7 2018.⁷ The appeal from that order was filed May 7. It was assigned to the settlement
8 program on May 21, and the conference was held on July 26. Briefing was reinstated
9 on August 1, 2018.
10

11 This motion is timely. It did not make sense to move to consolidate these two
12 appeals until after the settlement conference for the Schneider appeal. Because the
13 case was not resolved, both appeals from the same order are now pending, and it
14 makes sense to consolidate them before filing the opening brief in either.
15

16 Both of the appeals sought to be consolidated here are directly concerned with
17 Judge Leavitt's single order regarding Nevada's "anti-SLAPP" statutes; the two
18 appeals from that single hearing should be consolidated for judicial economy and to
19 reduce the possibility of inconsistent decisions and guidance.
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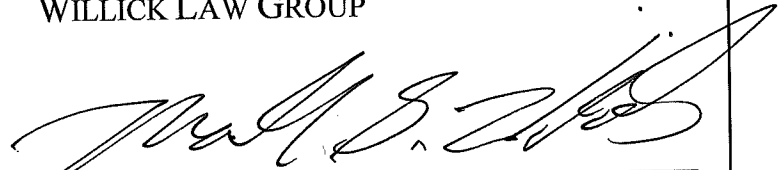
25 ⁶ Supreme Court Case No. 73838.
26

27 ⁷ Supreme Court Case No. 75834.
28

1 **WHEREFORE**, Appellant requests that this Court issue an order providing
2 for the consolidation of the above-referenced appeals and setting a new briefing
3 schedule.
4

5 **DATED** this 9th day of August, 2018.

6 WILLICK LAW GROUP

7
8 

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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 9th day of August, 2018, a document entitled *Motion to Consolidate Appeals* was 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:

Maggie McLetchie, Esq.
MCLECHIE SHELL LLC
701 E Bridger Avenue, #520,
Las Vegas, Nevada 89101
Attorney for Steve W. Sanson and
VETERANS IN POLITICS INTERNATIONAL, INC.

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Las Vegas, Nevada 89101
Attorney for Louis C. Schneider, and
LAW OFFICES OF LOUIS C. SCHNEIDER, LLC

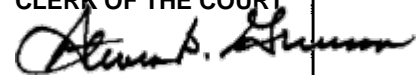

An Employee of the WILICK LAW GROUP

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EXHIBIT “1”

EXHIBIT “1”

EXHIBIT “1”



1
2 ORDER

3
4 DISTRICT COURT

5 CLARK COUNTY, NEVADA

6
7 IRINA ANSELL,

8 Plaintiff,

9 v.

10 DOUGLAS ANSELL,

11 Defendant.

CASE NO. D-15-521960-D

DEPT NO. Q

Date of Hearing: August 30, 2017

Time of Hearing: 2:00 p.m.

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13
14 ORDER OF RECUSAL

15 This matter came on for a hearing before this Court on August 30, 2017. The
16 matters before the Court included:

- 17
- 18 (1) Non-Party, Veterans In Politics International, Inc. and Steve Sanson's
19 Motion to Quash Subpoena Served on Verizon Wireless (Jul.26, 2017);
 - 20 (2) Non-Parties Steve Sanson, Veterans In Politics International, Inc., and
21 Sanson Corporation's Motion to Quash Subpoena Duces Tecum and
22 Deposition Subpoena Served on Steve Sanson on July 22, 2017 (Aug. 4,
23 2017); and
 - 24 (3) This Court's Amended Notice of Rescheduling of Hearing and Setting
25 Calendar Call (Aug. 28, 2017).

26 Associated motions and papers were considered and reviewed by the Court,
27 including requests for attorney's fees and Plaintiff's Motion to Compel (Aug. 10,
28 2017). The discovery issues previously were assigned to be heard by the Discovery
Commissioner on August 20, 2017. The Discovery Commissioner, however, recused

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2 and the matter was placed on this Court's calendar on the above-referenced date.
3 Plaintiff did not appear personally, but was represented by her attorney, Marshal
4 Willick, Esq. Defendant did not appear personally, but was represented by his
5 attorney, John Jones, Esq. Steve Sanson appeared personally and with his attorney,
6 Anat Levy, Esq.
7

8 As previously noted, this Court reviewed a multitude of papers filed by and on
9 behalf of Plaintiff and Mr. Sanson or Veterans In Politics International (hereinafter
10 referred to individually and collectively as "Mr. Sanson") in preparation for the hearing.
11 This Court's preparation included review of the Omnibus Supplemental Declaration
12 of Steve Sanson in Support of: Motions to Quash Subpoenas Duces Tecum Served on
13 Verizon Wireless and Steve Sanson and Deposition Subpoena Served on Steve on July
14 22, 2017; Motion for Attorneys Fees (Aug. 22, 2017) (hereinafter referred to as Mr.
15 Sanson's "Sworn Declaration"). Therein, Mr. Sanson described his off-the-record
16 communications with this Court about this matter. Upon reviewing Mr. Sanson's
17 Sworn Declaration, this Court determined that it should recuse from any further
18 proceedings in this matter. This determination is based on the findings stated on the
19 record at the August 30, 2017 hearing and additional findings stated herein.
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23 It is undisputed that Defendant designated Mr. Sanson as a witness. Moreover,
24 although Mr. Jones argued it was unlikely, Defendant could not definitively rule out
25 the possibility that Mr. Sanson might be called as a witness in future proceedings. It
26 also is undisputed that Mr. Sanson made specific reference to this case in a
27 communication directed at this Court off the record. In fact, this Court scheduled an
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2 immediate hearing in May 2017 to address Mr. Sanson's ex-parte communication with
3 the Court.¹ Mr. Sanson's filing of his Sworn Declaration, however, was the first
4 instance in which this Court became aware that Mr. Sanson had stated in writing the
5 nature of his communications with the Court.
6

7 This Court noted that it was unaware of any legal authority that would excuse
8 someone from a deposition who had been designated as a witness in the matter. This
9 Court also noted its concern that the Subpoena Duces Tecum served on Mr. Sanson
10 was overbroad and should be narrowed significantly. Because, however, this Court
11 recognized the conflict created by Mr. Sanson's Sworn Declaration, the Court did not
12 rule on the discovery motions and determined that the Court's recusal from this matter
13 was appropriate.
14
15

16 In Mr. Sanson's Sworn Declaration, he acknowledged that he asked the
17 Court off the record: "Why do you allow Marshal Willick to get away with so much
18

19 ...

20 ...

21 ...

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25 ¹At the May 17, 2017 hearing, this Court disclosed Mr. Sanson's communications with
26 the Court. This Court also noted for the record the nature of the Court's relationship with Mr.
27 Sanson in the past. This has included this Court's endorsement by Veterans in Politics as a
28 candidate for office and his prior professional communications about general issues (including
Mr. Sanson repeatedly stating that he believed this Court should serve as the presiding judge
in the Family Division). At the time of the May 2017 communication, Mr. Sanson was aware
that litigation before the Court should never be discussed. Thus, any communication about
a specific case was completely unexpected.

1
2 crap in Doug Ansell's case?"² For sake of completeness, the text messages and
3 telephone communication between Mr. Sanson and the Court took place as follows:

- 4 ● On May 11, 2017 at 8:20 p.m., Mr. Sanson texted: "Judge I need to
5 speak to you."
- 6 ● On May 12, 2017 at 6:52 a.m., the Court texted Mr. Sanson: "What do
7 you need to talk about?"
- 8 ● On May 12, 2017 at 9:29 a.m., Mr. Sanson responded with: "Call me at
9 your convenience or we can grab a cup of tea."
- 10 ● The Court called Mr. Sanson on May 13, 2017. After prefatory remarks
11 that included Mr. Sanson declaring that this Court should be the
12 presiding judge in the family division, Mr. Sanson, without prompting,
13 asked: "Why do you allow Marshal Willick to get away with so much
14 "crap" in Doug Ansell's case?"

15 ²On a number of occasions, this Court has lamented that *both* parties have engaged in,
16 to borrow Mr. Sanson's term, "crap" during this case. This Court repeatedly has chastised both
17 sides for their practice of hyperbole and exaggeration. Mr. Willick has almost incessantly
18 argued that this Court has allowed Defendant (Mr. Ansell) to get away with "crap" without
19 repercussion. Both Mr. Willick and Mr. Jones are adept at selectively handpicking those areas
20 of perceived wrongdoing of the other side and advocating through their myopic lenses. On Mr.
21 Jones' part, this was exemplified during the August 30, 2017 hearing through his argument that
22 the Court had given Plaintiff a "free pass" with respect to her alleged violation of the Order to
23 Seal Records (Oct. 16, 2015) (hereinafter referred to as the "Sealing Order"). The Sealing
24 Order *drafted and submitted by Defendant (Mr. Ansell)*, ordered that "all papers, records,
25 proceedings and evidence, including exhibits and transcripts of testimony in the above-entitled
26 matter, be, and the same hereby are, sealed and shall not be opened to inspection *except by the*
27 *parties* and their attorneys, or when required as evidence in another action or proceeding."
28 (Emphasis added). Mr. Jones' argument in Court notwithstanding, this matter was adjudicated
by the Court. See Order (Aug. 30, 2016). Thus, the Sealing Order *drafted and submitted by*
Defendant (Mr. Ansell), did not prohibit the conduct about which Defendant complained. NRS
125.110 provides that the papers sealed "shall not be open to inspection except *to* the parties
and their attorneys." The Sealing Order *prepared by Defendant* changed the statutory language
and provided that the papers sealed "shall not be opened to inspection except *by* the parties
and their attorneys." Recognizing the error of his own drafting, Defendant (Mr. Ansell)
submitted a second Order to Seal Records (Nov. 23, 2016). Mr. Jones knew these facts when
he lambasted the Court during the August 30, 2017 hearing for purportedly allowing Plaintiff
to violate a Sealing Order that did not proscribe the alleged conduct. Apart from these
examples of "crap," the Court has endured "crap" from *both* parties throughout this litigation.

- After immediately terminating the call, this Court texted Mr. Sanson as follows: "Please do not ever talk to me again about a pending case before me. I hold you in higher esteem than that. I'm sorry to end the call so abruptly. My integrity means too much to me than to be influenced by others outside of the courtroom and it shakes the very core of our system when anyone communicates with a judicial officer in this fashion. It simply cannot happen. I know that you know that and I have always trusted your judgment in that regard."
- Mr. Sanson's immediate text response reads: "You asked me a question because of our relationship I gave you my honest answer, so you can understand what direction we are headed."

This Court scheduled a hearing immediately (heard on May 17, 2017) to disclose the improper communication. Based on Mr. Sanson's testimony on August 30, 2017, he admitted that his communication with the Court was not intended to relay specific factual information about the Ansell case. When offered the opportunity to provide specific examples of "crap" perpetrated by Mr. Willick (such as a miscalculation by Mr. Willick, a fabricated fact, or some other specific example of "crap"), Mr. Sanson had nothing specific. As such, *the only purpose of his communication with the Court was to influence and intimidate the Court through a corrupt communication outside of court.*

Mr. Sanson could have limited his communication with the Court to a *general* accusation that Mr. Willick "gets away with crap," and left it at that.³ If Mr. Sanson's sole motivation was merely to attack Mr. Willick *in general* and not to influence the

³Based on the papers filed herein, this Court is aware that litigation is pending between Mr. Willick and Mr. Sanson. This Court's familiarity with this civil matter is limited to the disclosures contained in the papers filed in the Ansell matter. The animosity resulting from this civil litigation is palpable. Nevertheless, this animosity is not an excuse to attempt to manipulate and intimidate this Court – *particularly in regards to a specific case.*

1
2 Court about a specific case, he could have done so. Although such communication
3 remains improper, it is more egregious that Mr. Sanson *knowingly and intentionally*
4 *identified Doug Ansell's case*. It also is significant that Mr. Sanson's response was not
5 to offer an apology, or to assure the Court that he would refrain from doing so again.
6 Even at the August 30, 2017 hearing, Mr. Sanson remained unapologetic. In fact, his
7 demeanor and conduct was defiant, even lashing out at Mr. Willick to the point of
8 being admonished by the Court. Instead of apologizing to the Court, his follow-up
9 communication was a veiled threat to the Court. This threat by Mr. Sanson, as stated
10 by Mr. Sanson and interpreted by the Court, was to harass the Court and to hurl
11 baseless and defamatory accusations about the Court.
12

13
14 Mr. Sanson argues that his organization "exposes public corruption and
15 injustices." Further, despite the fact that Mr. Ansell designated Mr. Sanson as *his*
16 witness, Mr. Sanson states with emphasis that neither he nor VIPI "*have anything to do*
17 *with this case.*" To reiterate for the record, Mr. Sanson intentionally interjected himself
18 into this matter by communicating with the Court in reference to this specific case.
19 Plaintiff understandably and justifiably has sought to determine the full extent of such
20 off-the-record communications. To be clear, however, Mr. Sanson's involvement in this
21 matter is not about exposing "injustice" or corruption. Mr. Sanson acknowledged that
22 he had never met Plaintiff and proclaimed that he meant her no "ill will." Indeed, Mr.
23 Sanson appeared to be unaware that Defendant (Doug Ansell) was the prevailing party
24 with respect to the child custody issues in this case – an issue that is of the highest
25 significance in *most* cases.
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2 As noted previously, when given the opportunity at the August 30, 2017 hearing
3 to explain the "crap" that was occurring in the Ansell matter, Mr. Sanson was unable
4 to identify any singular fact. As such, notwithstanding his self-proclaimed faux cover
5 of seeking to "expose injustice and corruption," Mr. Sanson's sole motivation for
6 communicating with this Court was to intimidate and harass the Court. Mr. Sanson
7 proudly proclaims that he has "declared war" on the Family Court. There is no doubt
8 that the courts are under attack and that the entire judiciary of this great State of
9 Nevada is on notice that, behind that false banner of "justice and corruption" is an
10 individual and group who seek to manipulate, intimidate and control. The arsenal of
11 weapons that Mr. Sanson utilizes include attempts to manipulate, intimidate and
12 control the judicial process through off-the-record communications. This case has
13 exposed the reality of his tactics.
14

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16
17 Rather than apologize for his unethical and corrupt conduct, *Mr. Sanson has the*
18 *audacity to blame this Court for his improper communication.* Specifically, Mr. Sanson
19 alleges under oath in his Sworn Declaration that his off-the-record *question* to the Court
20 was somehow an answer to a same-day related conversation. The timing of this entire
21 narrative offered by Mr. Sanson is significant as it belies Mr. Sanson's story. Mr.
22 Sanson alleges in his Sworn Declaration that his originating text message took place on
23 the *same day* as a conversation with the Court in the courtroom (i.e., May 11, 2017).
24 To this end, Mr. Sanson's narrative suggests that his text message was intended merely
25 to follow-up on a conversation earlier that same day. Mr. Sanson's narrative, however,
26 is a *factual impossibility*. In this regard, May 11, 2017 was this Court's Chamber
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28

1
2 Calendar day. No hearings were scheduled in Department Q on May 11, 2017. There
3 was no conversation on May 11, 2017 as Mr. Sanson has alleged.⁴ Regardless, even if
4 Mr. Sanson's sworn recitation of facts is believed, his communication with the Court
5 *remains improper.*
6

7 What should be frightening to this Court (and members of the Nevada judiciary
8 in general), is that Mr. Sanson refused to acknowledge at the August 30, 2017 hearing
9 that his communication with the Court about a pending case was inappropriate.
10 Specifically, Mr. Sanson, through his counsel, suggested it was the Court's fault based
11 on the earlier conversation cited above. This Court reiterates that it is inappropriate
12 to communicate with a judicial officer off the record about a pending case – *at any*
13 *time and under any circumstances.* Mr. Sanson's attempts to deflect blame to the
14 Court are appalling.
15
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17 This Court's abrupt termination of the telephone call and immediate text to Mr.
18 Sanson that his communication was inappropriate was not Mr. Sanson's desired
19 response or reaction from the Court. It is now obvious that Mr. Sanson was looking
20 for a response from the Court more along the lines of: "I'm so sorry Mr. Sanson, I'll
21 make sure that Mr. Willick doesn't get his way," or, "I'm so sorry Mr. Sanson, I'll make
22 sure Mr. Ansell comes out on top," or even, "message received Mr. Sanson." *Is there*
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26 ⁴This is not simply a matter of "oops, I got the date wrong." Any change to the date
27 changes the entire narrative and creates a logical disconnection in time. This Court's staff
28 checked the videotape of the hearings in all cases held in Department Q on the preceding
Monday, Tuesday, and Wednesday of that same week and was unable to find Mr. Sanson in
the gallery at the beginning or conclusion of any case.

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2 *anything more corrupt than the influence Mr. Sanson sought to exert over the Court?*

3 And he proclaims that he seeks to expose corruption? Because this Court called him
4 out on the inappropriateness of his communication and refused to kowtow and cower
5 to his manipulation and control, Mr. Sanson predictably let the Court know that his
6 wrath was coming out against the Court. This type of threat to any judicial officer
7 strikes at the very core of the integrity of the judicial process. Moreover, such
8 threatening behavior is an attempt to manipulate and control judicial officers if they
9 do not succumb to Mr. Sanson's desired result.
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11

12 Mr. Jones argued that there is no evidence that Defendant had anything to do
13 with Mr. Sanson's communication with the Court or that he put Mr. Sanson "up to it."
14 Mr. Jones is correct that there was no testimony offered that indicates that Defendant
15 is responsible for Mr. Sanson's behavior. Defendant did not appear at the hearing to
16 offer his version of events. Although this Court is unable to attribute Mr. Sanson's
17 actions to Defendant directly, this Court notes that Mr. Sanson's communication with
18 the Court was not the first, nor the second, occasion in which the Court has received
19 outside communications about Defendant.⁵
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23 ⁵This Court previously disclosed at a prior hearing that an individual recently employed
24 by Defendant was this Court's direct ecclesiastical leader (Kurt Teshima). This Court disclosed
25 to the parties that the Court holds Mr. Teshima in high esteem. These disclosures were made
26 for full transparency in the event that either party desired that the Court recuse from the
27 matter. Mr. Willick offered (as an offer of proof) at the August 30, 2017 hearing that
28 Defendant, *together with Mr. Sanson*, had a breakfast meeting with Mr. Teshima. As an
additional offer of proof, when Defendant and Mr. Sanson attempted to discuss the divorce,
Mr. Teshima redirected the conversation to business matters. This Court is not surprised by
this redirection by Mr. Teshima and emphasizes that at no time has Mr. Teshima *ever* discussed
this matter with the Court. This Court has never felt any pressure or attempts to influence the
path of this case from Mr. Teshima.

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2 This Court recognizes the judicial duty to sit. Mr. Sanson's Sworn Declaration
3 filed on August 22, 2017, however, creates a conflict for the Court. Moreover, it has
4 become evident based on the history of this matter that any decision by this Court that
5 favors Defendant in any manner is perceived by Plaintiff as being influenced by
6 something that has happened outside of this courtroom. Similarly, Defendant may
7 have the perception that, because this Court has declared its disgust and disdain for
8 outside efforts to influence this matter, the Court is somehow overcompensating to
9 counter Plaintiff's perception. These perceptions (although untrue on both accounts)
10 are unfair to both parties. Accordingly, it is appropriate that this Court recuse from
11 this matter.
12

13
14 Finally, because there have been outside attempts to influence this Court in this
15 matter, complete transparency is warranted to maintain public confidence in the
16 administration of justice. Notably, Mr. Sanson (through counsel) argued that this
17 matter was improperly sealed. To clarify this Court's findings at the August 30, 2017
18 hearing, this Court concurs that the hearings in this matter and orders entered by the
19 Court should not be sealed and should be available for public inspection. However,
20 this Court recognizes that filings of the parties and experts contain sensitive
21 information related to both custody issues and financial issues. Consistent with NRS
22 125.110, those papers should remain sealed.
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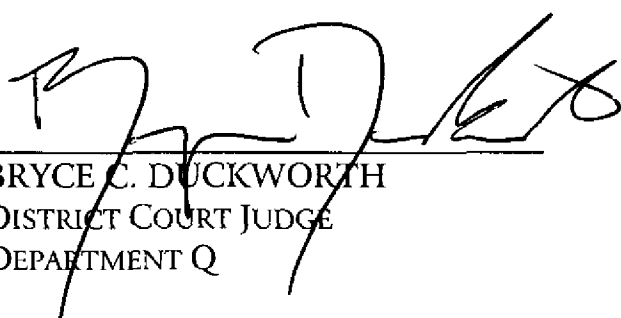
1
2 Based on the foregoing, and good cause appearing therefor,

3 It is hereby ORDERED that this Court RECUSE from this case. It is further
4 ORDERED that, to the extent possible, this matter be referred to the Senior Judge
5 Program for further proceedings.
6

7 It is further ORDERED that the hearings pending before this Court, including
8 trial dates and hearings related to discovery issues, should be re-calendared upon the
9 reassignment of this matter.
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11 It is further ORDERED that the hearing videos and orders entered by this Court
12 should be unsealed.

13 DATED this 5th day of September, 2017.
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17 _____
18 BRYCE C. DUCKWORTH
19 DISTRICT COURT JUDGE
20 DEPARTMENT Q
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