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

IN THE MATTER OF THE HONORABLE  
RENA HUGHES, EIGHTH JUDICIAL  
DISTRICT COURT, FAMILY DIVISION,  
DEPARTMENT J., COUNTY OF CLARK,  
STATE OF NEVADA

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Case No. 76117

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Appeal from the Nevada Commission on Judicial Discipline

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**RESPONDENT'S NOTICE OF SUPPLEMENTAL AUTHORITY**

**PURSUANT TO NRAP 31(e)**

Respondent, the Nevada Commission on Judicial Discipline, hereby provides Notice of Supplemental Authority pursuant to NRAP 31(e). This pertinent and significant authority was discovered by counsel today while preparing for the upcoming Oral Argument on December 2, 2019.

In Turner v. Saka, 90 Nev. 54, 518 P2d. 608, (1974) the Supreme Court considered an Order to Show Cause issued in New Jersey and declared it void for lack of notice. The Court held that even a temporary, non-final award of custody is a ‘deprivation’ under the terms of the Fourteenth Amendment and therefore requires notice and an opportunity to be heard unless there is an extraordinary situation where the facts clearly demonstrate a real danger of immediate and irreparable injury.

This authority relates to the Respondent’s Answering brief on pages 14-16.

Dated this 26th day of November, 2019.

By /s/ Thomas C. Bradley  
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**CERTIFICATE OF SERVICE BY ELECTRONIC FILING**

I hereby certify that I am an employee of the LAW OFFICE OF THOMAS C. BRADLEY, and that on the 26th day of November, 2019, I did serve by way of electronic filing, a true and correct copy of the above and foregoing **NOTICE OF SUPPLEMENTAL AUTHORITY** on the following:

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/s/ Mehi Aonga  
An employee of  
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