

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

<p>AMY MULKERN and VIVIAN MULKERN,</p> <p>Petitioners,</p> <p>vs.</p> <p>EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK, and THE HONORABLE FRANK P. SULLIVAN, DISTRICT JUDGE,</p> <p>Respondents,</p> <p>and</p> <p>CLARK COUNTY DEPARTMENT OF FAMILY SERVICES; CLARK COUNTY DISTRICT ATTORNEY'S OFFICE; BABY GIRL WHITE, a minor; KENNETH WENDTLAND, and ASHLEY WENDTLAND,</p> <p>Real Parties in Interest.</p>	<p>Supreme Court Case: 76399 District Court Case: J-17-324384-P3</p> <p>Electronically Filed Aug 06 2018 02:49 p.m. Elizabeth A. Brown Clerk of Supreme Court</p> <p><b>KENNETH WENDTLAND AND ASHLEY WENDTLAND'S ANSWER TO PETITIONERS AMY MULKERN AND VIVIAN MULKERN'S PETITION FOR WRIT OF MANDAMUS OR PROHIBITION</b></p>
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Real Parties in Interest Kenneth Wendtland and Ashley Wendtland file this Answer to Petitioners Amy Mulkern and Vivian Mulkern's Petition for Writ of Mandamus or Prohibition.

**I. NRAP 26.1 Disclosure**

The undersigned counsel of record certifies that the following are persons and entities as described in NRAP 26.1(1), and must be disclosed:

Kenneth Wendtland, an individual; and

Ashley Wendtland, an individual.

The attorneys who have appeared on behalf of respondents in this Court and in district court are:

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These representations are made in order that the judges of this court may evaluate possible disqualification or recusal.

DATED this 6<sup>th</sup> day of August, 2018.

HUTCHISON & STEFFEN, PLLC

A handwritten signature in black ink, appearing to read "Richard L. Wade", is written over a horizontal line.

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## **II. Table of Authorities**

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### **III. Routing Statement**

NRAP 17 applies to this action because it the case involves NEV. R. STAT. Chapter 432B. Therefore this matter is properly before the Supreme Court.

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#### IV. Introduction

Petitioner's writ is an attempt to get the Court to ratify conduct that was in violation of Nevada law. Amy and Vivian Mulkern should never have even been informed that Baby Girl White exists.

In 2014, the Kenneth and Ashley Wendtland took their first placement as an adoptive resource for two siblings. DECLARATION OF ASHLEY WENDTLAND IN SUPPORT OF KENNETH WENDTLAND AND ASHLEY WENDTLAND'S ANSWER TO PETITIONERS AMY MULKERN AND VIVIAN MULKERN'S PETITION FOR WRIT OF MANDAMUS OR PROHIBITION ("Decl."), ¶ 4, Ex. A. The children were four and eight-months old when they were placed with the Wendtland family. *Id.*, ¶ 5. They were part of a larger sibling group that had been separated, and had sibling visitation. *Id.*, ¶ 6. Not only did the two children in their care become part of their family, but the entire sibling group did as well. *Id.*, ¶ 7.

During this fostering experience, the Wendtlands learned what it was like to care for a special needs child as the four-year-old was diagnosed with autism. *Id.*, ¶ 8. They accepted the challenge. The Wendtlands attended every physical, occupational and speech therapy appointment, IEP meetings, volunteered in the classroom, and they advocated for the best interests of the children in their care.

*Id.*, ¶ 9. In 2016, the children were reunited with their biological mother. *Id.*, ¶ 10. Despite their broken hearts, Kenneth and Ashley knew there was more for them do with foster children. *Id.*

Ken works is an HR Director for a large hospitality corporation. *Id.*, ¶ 11. Ashley retired in 2015 from Microsoft so she could give her full attention caring for the children in their home. *Id.*, ¶ 12. Both Ken & Ashley are very active in the community. In their spare time they both lead small groups for their church's high school ministry. *Id.*, ¶ 13. Ken has volunteered as a children's soccer coach and sits on the boards of national nonprofit organizations. *Id.*, ¶ 14. Ashley volunteers as the director for the Ignite Life RefresHER Girls Conference in Las Vegas. *Id.*, ¶ 15. They are both passionate about helping others and education which is why they created the Wendtland Family Scholarship, a college scholarship for foster and adopted high school seniors in Clark County. *Id.*, ¶ 16.

In December 2017, the Wendtlands received a phone call to take a placement of two-month-old Baby Girl White. *Id.*, ¶ 17. The Department was looking for an adoptive resource for this baby who was born exposed to drugs, Hepatitis C, and spent weeks in the NICU. *Id.*, ¶ 18. They decided this baby was the perfect addition to their family. *Id.*



Since taking placement, Baby Girl White has thrived in their home. *Id.*, ¶ 19. She is meeting and exceeding most of her milestones. *Id.*, ¶ 20. They have worked closely with her pediatrician to make sure her nutrition and health concerns are top priorities. *Id.*, ¶ 21. She is continually monitored for HepC, as well as her GERD diagnosis. *Id.*

Baby Girl White is a happy baby. *Id.*, ¶ 22. Her smile is contagious. *Id.* She is already bonded to her foster parents. *Id.*, ¶ 23. Her first word was “Dada,” followed shortly by “Mama.” *Id.*, ¶ 24. She loves to dance and loves when Ken & Ashley play guitar and piano for her. *Id.*, ¶ 25. Baby Girl is surrounded and loved by her family and the community. *Id.*, ¶ 26. She enjoys family get-togethers with grandparents, great-grandparents, aunts, uncles and cousins. *Id.* She has even traveled to Arizona to meet additional family. *Id.*, ¶ 27. She loves the water and enjoys warm weather and swimming with her playmates. *Id.*

Baby Girl is a protected person and is in the care of Clark County Department of Family Services (CCDFS). She is 10 months old, born October 5, 2017 in Las Vegas, Nevada. She came into the protective custody of CCDFS on October 6, 2017 when she was one day old. On December 18, 2017, the Department placed Baby Girl in Ken & Ashley Wendtlands’ home where she has been continuously for the past eight months.

At some point after the child was placed with the Wendtlands, the situation changed in a manner that should have never happened. LuQuisha McCray (“Ms. McCray”), a DFS caseworker, somehow discovered that Baby Girl White had an older putative sibling that had been adopted out of state in February 2015. How she discovered that information is unknown, given that all information regarding private adoptions the Department receives is confidential. Despite this, and in violation of Nevada’s adoption laws, Ms. McCray contacted the local, private adoption agency with whom Amy Mulkern worked, and obtained Amy and Vivian Mulkern’s contact information. Ms. McCray then informed Amy Mulkern that her adopted daughter had a sibling and encouraged her to seek placement of Baby Girl White. *See* Decision, Petitioner’s Appx. Vol. 2, Ex. 44. Ms. McCray never should have investigated the other adoption, let alone tracked down and contacted Amy Mulkern. Her actions violated Nevada law, were contrary to Department policy, and never should have occurred.

In early April, after discovering the surreptitious actions of its worker, the Department’s Upper Management determined that it was in Baby Girl White’s best interest to remain in Nevada with the Wendtlands. *See* Decision, Petitioner’s Appx. Vol. 2, Ex. 43, at AM000336. And although the Children’s Attorney Project initially agreed that the best placement was with the Wendtlands, it later changed

its mind. On May 29, 2018, the District Court recognized the Wendtlands as persons with special interest based on the fact that they are Baby Girl White's foster parents. *See* Order Recognizing Foster Parents as Persons with Special Interest, Petitioner's Appx. Vol. 2, Ex. 38.

## **V. Discussion**

### **A. Allowing Amy and Vivian Mulkern to participate in this action would undermine the protections afforded by adoption law.**

Adoptions are confidential—not just the decrees, but all of the documents, reports, hearings, and the like. NEV. R. STAT. § 127.057 (DFS's own data is confidential); NEV. R. STAT. § 127.140. In fact, DFS is expressly barred from even viewing adoption records. NEV. R. STAT. § 127.140. Here, Vivian was adopted via a local, private adoption agency. Presumably, DFS was not even involved. Yet somehow, Ms. McCray was able to determine that Baby Girl White had an alleged, adopted sibling, discover the agency through which the adoption was finalized, obtain not just Amy Mulkern's name but also her contact information, and then reach out to Amy regarding placement. In addition to being contrary to a clear statute meant to protect the privacy of birth parents, adoptive parents and adopted children, Ms. McCray's actions undermine the pillars upon which adoption rests. When an adoption is finalized, the adoptive family needs to know that their privacy

rights will be protected. These families must know that biological relatives cannot track them down and attempt to inject themselves into a “new” family.

Allowing Amy and Vivian Mulkern to participate here flies in the face of the fundamentals of adoption. While Amy may want to participate, the repercussions of her participation are that the confidentiality statutes would be weakened, and that families who strongly do *not* wish to have their supposedly confidential adoption records casually disclosed would have far less certainty. In fact, it could ultimately have a chilling effect on adoptions themselves, with families deciding not to adopt under circumstances where biological families or others could easily track them down. Amy and Vivian Mulkern absolutely should not be part of this equation.

**B. Amy Mulkern has no standing to join this action.**

Although Petitioners argue the basic civil joinder rules to support their attempts to enter this action and participate as parties, Nevada law treats them differently than in a typical civil case. The parties to proceedings like the case *sub judice* are generally the biological parents, the child, and the Department. *See, e.g.*, NEV. R. STAT. § 432B.420. Other people with an interest in the proceedings can only be certified as “persons with special interest.” Although they are not parties, Nevada allows persons with special interest to testify at placement hearings, and

offer recommendations regarding the same. NEV. R. STAT. § 432B.457(1). Persons with special interest are defined as the child's parents, foster parents, mental or health care providers, or teachers. *Id.*, 432B.457(2). The plain language of the statute reflects that these are the sole categories of persons with special interest. Neither an adopted sibling nor a parent of that adopted sibling is a person of special interest under Nevada law.

Despite meeting none of these categories, the Judge deemed Mulkern a *de facto* person with special interest based on principles of equity. Decision, Petitioner's Appx. Vol. 2, Ex. 43, at AM000339. Importantly, as the Court noted in the disputed order, that does not entitle her to become a party to the action. *Id.*, at AM000338. *See also* NEV. R. STAT. § 432B.590(10) ("The provision of notice and a right to be heard pursuant to this section does not cause . . . any adoptive parent of a sibling of the child. . . to become a party to the hearing."). *See also* Petition for Writ of Mandamus or Prohibition, at 44-45 (claiming that nothing requires the court to add persons with special interest as parties, but claiming the court is not prohibited, either). Given that Mulkern is not a person with special interest and is not entitled to become a party to the action, she has no standing to enter this action in any capacity.

Notably, even within their (incorrect) purview of civil joinder, Petitioners exceed the bounds of the law. For example, Petitioners claim that *Roberts v. Farmers Ins. Co.*, 91 Nev. 199, 200, 533 P.2d 158, 159 (1975), demonstrates that joinder is “proper in the circumstances we have here.” *Roberts* is entirely inapposite. *Roberts* involved a car crash. The plaintiff sued both the other driver as well as his insurer. Plaintiff’s claim against the insurer was for breach of the insurance contract based on her being a third-party beneficiary of the policy. The insurer challenged being joined to action, on the grounds that Plaintiff’s cause of action against the insurer would not accrue until the insurer failed to pay an eventual judgment. The Court agreed with the insurer, affirming the lower court’s dismissal. The Court did use language Plaintiff quoted in dicta at the end of its opinion, but Plaintiff’s claim that the “Supreme Court found that joinder of a party is proper in the circumstances we have here” is simply not supported by the dicta in the case. The facts are entirely different, and *Roberts* was not a 432B case. *Roberts* and the general joinder rules simply do not apply to this situation. Nevada law is clear that Amy cannot be a party to this action. Further, she should not even be a participant.

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**C. Vivian Mulkern also has no standing because she is not legally related to Baby Girl White.**

Mulkern's joinder seeks to have Vivian joined as a party to the action pursuant to NRCP 19 and 20. This constitutes a fundamental misunderstanding of the proceedings and must be denied. Under NEV. R. STAT. § 127.160, once a child is adopted, all of the legal ties to the biological parents and other relatives are severed. *See also Bopp v. Lino*, 885 P.2d 559, 563 (Nev. 1994). Siblings too are severed from the adopted child. *Id.* (noting that post-adoptive contact rights only exist if they pre-dated the adoption). They may share blood, but as a matter of law, Vivian and Baby Girl White are not related. Therefore, Vivian has no standing to be recognized as a party.

**D. Because she is neither a sibling nor a relative of Baby Girl White, Amy Mulkern is not entitled to a familial preference or presumption under Nevada law.**

When a child is in the protective custody of the state, placement is guided by NEV. R. STAT. § 432B.550(5). That statute notes that placement with siblings is presumed to be in the best interests of the child. NEV. R. STAT. § 432B.550(5). Further, the statute expresses a preference for placement with relatives within the fifth degree of consanguinity over foster parents. *Id.* Importantly, this familial preference expressly applies to relatives who are "suitable and able to provide proper care and guidance for the child." Because parental rights have not yet been

terminated, NEV. R. STAT. § 432B.550 guides placement preferences. Therefore, for there to be a familial placement preference, either Amy or Vivian would have to be siblings or relatives of the child. Neither is the case.

There is no sibling preference here. Adoption severs all rights and ties to biological parents and other relatives. NEV. R. STAT. § 127.160. *See also Bopp v. Lino*, 110 Nev. 1246, 885 P.2d 559, 563 (Nev. 1994). Siblings, too, are severed from the adopted child. In fact, former siblings are only entitled to post-adoptive contact with adopted former siblings when the rights were granted before the adoption was finalized. NEV. R. STAT. § 127.171(1)(a). Vivian is not a sibling or any other relative of the child.

Vivian was adopted more than two years before Baby Girl White was born. *See, e.g.,* Decision, Petitioner's Appx. Vol. 2, Ex. 43, at AM000343. At the time Vivian was adopted, all legal ties to Ms. White were severed. By the time Baby Girl White was born two years later, she was not related to Vivian at all. Vivian and the child were never related. Consequently, there is no sibling preference favoring Vivian.

For the same reasons, there is no familial preference, either. It is undisputed that Amy has no blood relationship to the child. She is merely the adoptive parent of a putative sibling. Consequently, no preference applies to her. Further, even if



Vivian were the child's legal relative — and she is not — the familial preference expressly applies only to relatives who are “suitable and able to provide proper care and guidance for the child.” Three-year-old Vivian is not remotely suitable or able to provide proper care and guidance for another child. Neither Vivian nor Amy satisfy the requirements for familial placement.

Therefore, the statutory preference is for the child to be placed with a foster family. This has already occurred. The child has been living with her foster parents the Wendtlands for eight months. They are bonded to one another, and truly are family. The child should stay with the Wendtlands.

**E. Staying with the Wendtlands is in the best interest of the child.**

In any action regarding custody of a minor child, “the sole consideration of the court is the best interest of the child.” NEV. R. STAT. § 125C.0035(1). It is in the child's best interests to stay with the Wendtlands, the only family she knows. In fact, DFS agrees.

Baby Girl White has lived with the Wendtlands for the majority of her life. They are her family. The Wendtlands are willing and able to provide for her and to ensure her educational, physical and emotional needs are met. The Wendtlands' entire family have accepted her as their own, even those living out of state. Ken and Ashley are aware of the fragility of her health, and are carefully monitoring it.

Despite these issues, she is thriving. She has bonded with the Wendtlands, and they with her. It is in her best interest to stay with the Wendtlands, who wish to adopt her. Notably, the Department agrees, as it attested to in the April 3, 2018 hearing.

## **VI. Conclusion**

Based on the foregoing, Kenneth and Ashley Wendtland respectfully requests that Petitioners Amy Mulkern and Vivian Mulkern's Petition for Writ of Mandamus or Prohibition be denied because the district court did not err or manifestly abuse its discretion in denying petitioners' motions to intervene and for placement.

Dated this 6<sup>th</sup> day of August, 2018.

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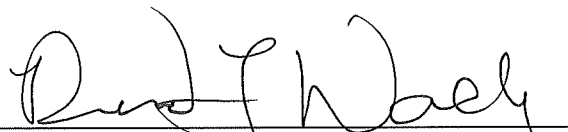
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## VII. Certificate of Compliance

I hereby certify that I have read this appellate brief, and to the best of my knowledge, information, and belief, it is not frivolous or interposed for any improper purpose. I further certify that this brief complies with all applicable Nevada Rules of Appellate Procedure, in particular NRAP 21, which governs filing of petitions for extraordinary writs. I understand that I may be subject to sanctions in the event that the accompanying brief is not in conformity with the requirements of the Nevada Rules of Appellate Procedure.

Dated this 6<sup>th</sup> day of August, 2018.

HUTCHISON & STEFFEN, PLLC

A handwritten signature in black ink, appearing to read "Todd L. Moody", written over a horizontal line.

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## **CERTIFICATE OF SERVICE**

I certify that this document was filed electronically with the Nevada Supreme Court on the 6<sup>th</sup> day of August, 2018. Electronic service of the foregoing **KENNETH WENDTLAND AND ASHLEY WENDTLAND'S ANSWER TO PETITIONERS AMY MULKERN AND VIVIAN MULKERN'S PETITION FOR WRIT OF MANDAMUS OR PROHIBITION** shall be made in accordance with the Master Service List as follows:

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EXHIBIT PAGE ONLY

**EXHIBIT A**

**DECLARATION OF ASHLEY WENDTLAND IN SUPPORT OF  
KENNETH WENDTLAND AND ASHLEY WENDTLAND'S ANSWER TO  
PETITIONERS AMY MULKERN AND VIVIAN MULKERN'S PETITION  
FOR WRIT OF MANDAMUS OR PROHIBITION**

I, Ashley Wendtland, declare under penalty of perjury:

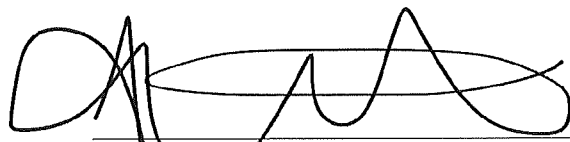
1. I am a resident of Clark County, Nevada over the age of 18.
2. I make this declaration upon personal knowledge. I am competent to testify as to these matters.
3. My husband Kenneth Wendtland and I are foster parents to Baby Girl White.
4. In 2014, the Kenneth and I took our first placement as an adoptive resource for two siblings.
5. The children were four and eight-months old when they were placed with us.
6. They were part of a larger sibling group that had been separated, and had sibling visitation.
7. Not only did the two children in their care become part of our family, but the entire sibling group did as well.
8. During this fostering experience, we learned what it was like to care for a special needs child as the four-year-old was diagnosed with autism.
9. We accepted the challenge and attended every physical, occupational and speech therapy appointment, IEP meetings, volunteered in the classroom, and advocated for the best interests of the children in our care.

10. In 2016, the children were reunited with their biological mother. Despite our broken hearts, Kenneth and I knew there was more for us to do with foster children.
11. Ken works as an HR Director for a large hospitality corporation.
12. I retired in 2015 from Microsoft so I could give my full attention to caring for the children in our home.
13. In our spare time we both lead small groups for our church's high school ministry.
14. Ken has volunteered as a children's soccer coach and sits on the boards of national nonprofit organizations.
15. I volunteer as the director for the Ignite Life RefresHER Girls Conference in Las Vegas.
16. We are both passionate about helping others and education which is why we created the Wendtland Family Scholarship, a college scholarship for foster and adopted high school seniors in Clark County.
17. In December 2017, we received a phone call to take a placement of two-month-old Baby Girl White.
18. DFS was looking for an adoptive resource for this baby who was born exposed to drugs, Hepatitis C, and spent weeks in the NICU. We decided this baby was the perfect addition to our family.



19. Since taking placement, Baby Girl White has thrived in our home.
20. She is meeting and exceeding most of her milestones.
21. We have worked closely with her pediatrician to make sure her nutrition and health concerns are top priorities. She is continually monitored for HepC, as well as her GERD diagnosis.
22. Baby Girl White is a happy baby. Her smile is contagious.
23. We are already bonded to one another.
24. Her first word was "Dada," followed shortly by "Mama."
25. She loves to dance and loves when we play guitar and piano for her.
26. Baby Girl is surrounded and loved by her family and the community. She enjoys family get-togethers with grandparents, great-grandparents, aunts, uncles and cousins.
27. She has even traveled to Arizona to meet additional family. She loves the water and enjoys warm weather and swimming with her playmates.

DATED this 6th day of August, 2018.



Ashley Wendtland