

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

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CRAIG A. MUELLER,

Appellant,

vs.

CRISTINA A. HINDS,

Respondent.

S.C. No.:

D.C. Case No.:

Electronically Filed  
Jan 21, 2022 04:44 p.m.  
83412 & 84077  
Elizabeth A. Brown  
Clerk of Supreme Court  
D-18-571065-D

**NON-OPPOSITION TO CONSOLIDATION; OPPOSITION TO  
FURTHER BRIEFING OF FIRST APPEAL**

**I. INTRODUCTION**

Respondent, Cristina A. Hinds, by and through her attorney, Marshal S. Willick, Esq., of the Willick Law Group, and pursuant to NRAP 27(a)(3), submits this response to the *Motion for Leave to Remove Appeal from Child Custody Fast Track Program and Consolidate with Related Appeal* filed on January 21, 2022.

In short, we have no objection to consolidation of the fees appeal with the appeal of the underlying order, which makes sense for judicial economy and that of the parties. But we object to re-briefing the appeal that has already been fully briefed by both sides.

## **POINTS AND AUTHORITIES**

### **II. STATEMENT OF FACTS**

The *Decision* leading to appeal No. 83412 was issued months before the final ruling on attorneys fees, which led to appeal No. 84077. They concern precisely the same facts and parties and litigation, and it makes sense to resolve them together. We agree with counsel for Mr. Mueller, who has indicated that the decision in the earlier appeal could conceivably moot the second appeal.

### **III. NON-OPPOSITION AND OPPOSITION**

As of this writing, appeal No. 83412 has been fully briefed. We dispute that the issues involved in that appeal are particularly complex, and in any event we see no legitimate purpose to be served by “removing the case from the Fast Track Program” and re-briefing it, which would simply cost both sides more money and incur further delay.

It does make sense for the attorney’s fee appeal to be consolidated, however, as the same Appendix is referenced for all underlying facts, and it involves the same parties and litigation. The issues involved in the attorney’s fee appeal are not particularly complex either, although they do have some public policy ramifications; we would have no objection to the Court issuing such further order for limited

briefing of the second appeal as it feels is merited, although we believe it could easily be accomplished under the briefing standards for Fast Track submissions.

#### **IV. CONCLUSION**

The two appeals should be consolidated. The first appeal should not be re-briefed. Fast Track or other limited briefing of the second appeal is all that should be required.

**DATED** this 21st day of January, 2022.

Respectfully Submitted By:  
WILLICK LAW GROUP

/s/Marshal S. Willick

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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 21st day of January, 2022, document entitled *Non-Opposition and Opposition* 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:

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