

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

2 WASHOE COUNTY HUMAN)
3 SERVICES AGENCY,)
4 Petitioner,)
5 vs.)
6 THE SECOND JUDICIAL DISTRICT)
7 COURT OF THE STATE OF)
8 NEVADA, IN AND FOR THE)
9 COUNTY OF WASHOE; AND)
10 HONORABLE PAIGE DOLLINGER,)
11 DISTRICT JUDGE,)
12 Respondents,)
13 and)
14 ROLANDO C.-S; PORSHA C.-S; AND)
15 L.S.C., A MINOR CHILD,)
16 Real Parties in Interest.)

Electronically Filed
Jul 11 2022 02:59 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court Case No. 22-00411

17 **NOTICE OF REQUEST FOR ACCESS TO THE PETITION FOR**
18 **WRIT**

19 **FAMILY LAW SECTION, STATE BAR OF NEVADA**

20 **Family Law Section, State Bar of Nevada**
21 AUDREY J. BEESON, ESQ.
22 Nevada Bar No. 010511
23 MICHELLE A. HAUSER, ESQ.
24 Nevada Bar No. 007738
25 ABIGAIL L. JAQUETTE, ESQ.
26 Nevada Bar No. 012001
27 SHANN D. WINESETT, ESQ.
28 Nevada Bar No. 005551
 c/o The Law Offices of Frank. J. Toti
 6900 Westcliff Dr Ste 500
 Las Vegas, Nevada 89145
 Family Law Executive Council

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FACTS

On June 17, 2022 the Nevada Supreme Court issued an Order Inviting Amicus Curiae Participation and invited, among others, the Family Law Section, State Bar of Nevada to participate as amicus curiae in this proceeding and to file a brief addressing the issue raised in the original proceeding: whether the juvenile court erred in finding NRS 32B.393(3)(c) unconstitutional and in denying the Washoe County Human Services Agency’s motion seeking no reasonable efforts finding pursuant to NRS 432B.393 and the Adoption and Safe Families Act.

A “Motion to File Documents Under Seal” was filed on August 26, 2021. An “Order Granting Motion to Seal and Directing Answer” was filed on November 10, 2021, and the clerk of court was directed to file the petition and appendix under seal.

REQUEST FOR ACCESS TO PETITION AND APPENDIX

For the Family Law Section, State Bar of Nevada to determine whether to file an amicus curiae brief, the section needs to review the underlying petition and appendix. Time is of the essence, as any amicus brief was directed to be filed within 30 days of the date of the June 17, 2022 Order and the section will likely need to file a motion for an extension of time to file the brief if the section decides to participate

...

...

1 in the case. Therefore, the section respectfully requests access to the petition for
2 writ of mandamus and appendix.
3
4

5 Respectfully submitted this 11th day of July 2022
6
7

8 /s/ Audrey J. Beeson
9 AUDREY J. BEESON, ESQ.
10 Nevada Bar No. 010511
11 Family Law Section
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

Erin L. Morgan
Washoe County District Attorney's Office

Jennifer Jeans
Washoe Legal Services

Audrey J. Beeson
Audrey J. Beeson
Family Law Section