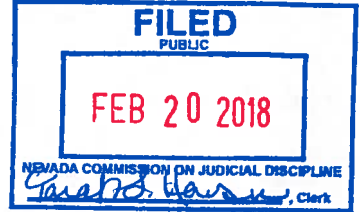


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ORIGINAL

NEVADA COMMISSION ON JUDICIAL DISCIPLINE
STATE OF NEVADA


In the Matter of)
11 THE HONORABLE RENA HUGHES,) CASE NO. 2016-113-P
12 Eighth Judicial District Court, Family Division,)
13 Department J, County of Clark, State of Nevada,)
14 Respondent.)

MOTION FOR EXPANSION OF TIME TO PRESENT RESPONDENT'S DEFENSE

COMES NOW, the Honorable Rena Hughes, Eighth Judicial District Court, Family Division,
Department J, County of Clark, State of Nevada, and moves that this Honorable Commission grant
and expansion of time to present Respondent's defense in the instant case.

Said Motion is made and based upon the attached analysis of facts and points and authorities.

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1 ANALYSIS OF FACTS

2 The Commission should be advised that the Honorable Judge Hughes has caused to be filed
3 a motion to transfer hearing to Las Vegas, Nevada or, in the alternative, to conduct said hearing by
4 way of video in Las Vegas, Nevada. The Respondent incorporates by reference herein the points and
5 authorities filed on behalf of Judge Hughes with that document along with the affidavit in support
6 of the motion to transfer. The purpose of the instant motion is for an expansion of time to allow the
7 Respondent to present her case. Pursuant to the order setting forth the public hearing, the
8 Respondent was given a period of four hours to present her case. The Respondent is mindful that
9 the Special Prosecutor was also allotted the same period of time and in filing the instant motion the
10 Respondent would state that she has no problem with allowing the Special Prosecutor an additional
11 period of time to present his case if so requested. The Special Prosecutor has given notice to the
12 defense of the number of witnesses they potentially intend to call during the instant hearing. By way
13 of the affidavit of the Honorable Judge Hughes, she has indicated the potentiality of calling no less
14 than five witnesses. This obviously does not include herself although she has the ability to testify
15 during the Respondent's case in chief whether or not the Special Prosecutor calls her as a witness.


16 Under the Procedural Rules of the Nevada Commission on Judicial Discipline Rule 26 the
17 Respondent is aware that "The Commission may limit time each party is allowed to present
18 evidence..." As likewise argued on behalf of Judge Henry who is in a similar position to Judge
19 Hughes, the Respondent does not question the ability of the Commission to limit the amount of time.
20 What the Respondent objects to is the amount of time which has been allocated. Within the points
21 and authorities files in support of the motion to transfer certain cases have been set forth in reference
22 to discretionary acts to be conducted by such entities as the Commission. Again, those acts must be
23 based on reasonableness and not on an abuse of discretion. It is also submitted that the Commission,
24 respectfully has failed to take into consideration the Respondent's ability to prepare and present her
25 own defense. To simply limit her to four hours is not, respectfully, reasonable.

1 CONCLUSION

2 As a result, it is Respondent's request that the period of time allowed to be presented by
3 Respondent in her case be expanded from a period of four hours to eight hours. This will allow the
4 Respondent to adequately present her witnesses as well as allow her to testify on her own behalf.

5 DATED this 13th day of February, 2018.


6 WILLIAM B. TERRY, CHARTERED

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18 CERTIFICATE OF MAILING

19 I hereby certify that on the 13th day of February, 2018, I, as an employee of WILLIAM B.
20 TERRY, CHARTERED, that a true and correct copy of the foregoing **MOTION FOR**
21 **EXPANSION OF TIME TO PRESENT RESPONDENT'S DEFENSE** was deposited in the
22 United States Mail at Las Vegas, Nevada, postage fully prepaid thereon for first class mail addressed
23 to:

24 Thomas Bradley, Esq.
25 448 Hill Street
26 Reno, Nevada 89501
27 Special Prosecutor

28 
As an employee of William B. Terry, Chartered