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7 NEVADA COMMISSION ON JUDICIAL DISCIPLINE
8 STATE OF NEVADA
9

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

14 **RESPONSE TO OPPOSITION TO MOTION TO TRANSFER HEARING TO LAS**
15 **VEGAS, NEVADA OR, IN THE ALTERNATIVE, TO DO SAID HEARING BY VIDEO**

16 COMES NOW, the Respondent, the Honorable Rena Hughes, by and through her counsel
17 WILLIAM B. TERRY, ESQ., of the law offices of WILLIAM B. TERRY, CHARTERED and files
18 the instant response to the opposition of the motion to motion to transfer hearing to Las Vegas,
19 Nevada or, in the alternative, to do said hearing by video.

20 Said Response is made and based upon the attached analysis of facts and points and
21 authorities.

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1 ANALYSIS OF FACTS

2 The Respondent will rely upon the original points and authorities filed in support of the
3 motion to transfer the hearing to Las Vegas, Nevada or to do said hearing by video. Within the
4 original motion, the Respondent outlined at least some of the witnesses which are expected to be
5 called all of whom are from Las Vegas. There may additionally be changes or additions to the
6 witnesses and Respondent is still considering that at this point in time. No matter who specifically
7 ends up testifying, however, it appears that they will be from Las Vegas, Nevada since that is where
8 the "event" occurred. While it is recognized that the Commission has extended all courtesies to the
9 Respondent to date, the Respondent was never consulted as to whether or not it would be convenient
10 to have the hearing in Reno, Nevada vs. Las Vegas, Nevada. The Respondent also has suggested
11 in the original motion that electronic testimony might be appropriate in the instant case and has
12 respectfully reminded the Commission of certain matters which have been done by way of electronic
13 testimony including the Honorable Judges Ramsey, Kephart, Smith and others.

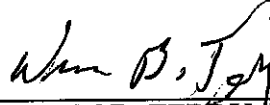
14 In its responsive points and authorities, prosecuting officer cites the recent matter of the
15 Honorable Judge Melanie Andress-Tobiasson. It is recognized that a similar motion was filed in that
16 case and ultimately denied by the Commission. In *Tobiasson*, however, realistically the only witness
17 that was going to be testifying was Judge Tobiasson and there did not seem to be any dispute in that
18 regard. At the current time, there is also a matter pending in reference to the Honorable Judge
19 Henry, Case No. 2016-142-P and a similar motion has been filed in that matter. Judge Henry like
20 Judge Hughes are located in Las Vegas, Nevada.

1 CONCLUSION

2 For the above-indicated reasons, it is respectfully requested that the hearing be transferred
3 to Las Vegas, Nevada or, in the alternative, be done by way of electronic testimony.

4 DATED this 23rd day of March, 2018.

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15 Attorney for Respondent

16 CERTIFICATE OF SERVICE

17 I hereby certify that on the 23rd day of March, 2018, I, as an employee of WILLIAM B.
18 TERRY, CHARTERED, that a true and correct copy of this **RESPONSE TO OPPOSITION TO**
19 **MOTION TO TRANSFER HEARING TO LAS VEGAS, NEVADA OR, IN THE**
20 **ALTERNATIVE, TO DO SAID HEARING BY VIDEO** was emailed to the following:

21 Paul C. Deyhle
22 Executive Director
23 Nevada Commission on Judicial Discipline
24 pdeyhle@judicial.state.nv.us

25 Thomas Bradley, Esq.
26 Special Prosecutor
27 Tom@TomBradleyLaw.com

28 
As an employee of William B. Terry, Chartered