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1 2	WILLIAM B. TERRY, ESQ. Nevada State Bar No. 001028 WILLIAM B. TERRY CHARTERED
3	530 South Seventh Street Las Vegas, Nevada 89101 CONTROL OF THE PROPERTY OF T
4	(702) 385-0799 (702) 385-9788 (Fax) Info@WilliamTerryLaw.com NEVADA COMMISSION ON JUDICIAL DISCIPLINE
5	Attorney for Respondent
6	ORIGINAL
7	THE PROPERTY OF WIDIGIAL DIGGIDLES
8	BEFORE THE NEVADA COMMISSION ON JUDICIAL DISCIPLINE
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11	IN THE MATTER OF THE HONORABLE OF THE HONORABLE Case No. 2016-113-P
12	RENA G. HUGHES, Eighth Judicial District Court, Department J - Family Court, County of Clark, State of Nevada
13)
14	Respondent.
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16	<u>VERIFIED RESPONSE AND ANSWER</u>
17	COMES NOW, the Respondent, RENA G. HUGHES, Judge the Eighth Judicial District Court,
	by and through her counsel, WILLIAM B. TERRY, ESQ., of the law offices of WILLIAM B. TERRY,
18	CHARTERED and files the instant answer, defenses and mitigating circumstances in reference to the
19	Formal Statement of Charges filed against her.
20	WILLIAM B. TERRY, CHARTERED
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22	WILLIAM D. TEDDY DEC

WILLIAM B. TERRY, ESQ. Nevada Bar No. 001028 WILLIAM B. TERRY, CHARTERED 530 South Seventh Street Las Vegas, Nevada 89101 (702) 385-0799 Attorney for Respondent

FACTUAL ALLEGATIONS

In answering the factual allegations set forth in the Formal Statement of Charges, the Respondent denies she violated Canons 1 and 2 of the Revised Code of Judicial Conduct ("the Code"). Further, the Respondent denies she violated Canon 1, Rule 1.1 and Rule 1.2; Canon 2, Rule 2.2, Rule 2.5(A), Rule 2.6(A) and 2.8(B).

COUNT ONE

In answering those allegations set forth in Count One, the Respondent does deny that she violated Canon 1, Rule 1.1, failing to comply with the law, including the Code; and Rule 1.2, failing to promote confidence in the judiciary. She further denies that she violated Canon 2, Rule 2.2, failing to uphold and apply the law and failing to perform all duties of her judicial office fairly and impartially; Rule 2.5(A), failing to perform judicial and administrative duties, competently and diligently; and Rule 2.6(A), failing to accord a party's right to be heard. She further denies that she abused her judicial authority by engaging in any or all, or any combination of, these rules.

COUNT TWO

In answering those allegations set forth in Count Two, the Respondent does deny that she violated Canon 1, Rule 1.1, failing to comply with the law, including the Code; Rule 1.2, failing to promote confidence in the judiciary. Respondent further denies that she violated Canon 2, Rule 2.2, failing to uphold and apply the law and failing to perform all duties of her judicial office fairly and impartially; Rule 2.5(A) failing to perform judicial and administrative duties competently and diligently; Rule 2.6(A), failing to accord a lawyer's right to be heard; and Rule 2.8(B), failing to be patient, dignified, and courteous to litigants, jurors, witnesses, lawyers, court staff, court officials, and others with whom the judge deals in an official capacity. She further denies that she abused her judicial authority by engaging in any or all, or any combination of these rules.

AFFIRMATIVE DEFENSES

In Count One, the Formal Statement of Charges fails to specifically allege how Respondent's course of conduct violated each Canon alleged.

In Count Two, the Formal Statement of Charges fails to specifically allege how Respondent's course of conduct violated each Canon alleged.

1	MITIGATING CIRCUMSTANCES
2	In answering the Formal Statement of Charges, the Respondent does assert that there are
3	mitigating circumstances that are applicable to her including, but not limited to, the following:
4	(1) The absence of a prior disciplinary record;
5	(2) The absence of a dishonest and selfish motive;
6	(3) Cooperation with the Judicial Ethics Panel;
7	(4) The Respondent's good character and good reputation;
8	(5) Interim rehabilitation;
9	(6) Remorse; and
10	(7) Any and all other mitigating circumstances which the Respondent shall raise.
11	DATED this 25 th day of October, 2017.
12	WILLIAM B. TERRY, CHARTERED
13	un Blan
14	WILLIAM B. TERRY, ESQ. Nevada Bar No. 00/028
15	WILLIAM B. TERRY, CHARTERED 530 South Seventh Street
16	Las Vegas, Ne√ada 89101 (702) 385-0799
17	Attorney for Respondent
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1	VERIFICATION
2	STATE OF NEVADA)
3) SS. COUNTY OF CLARK)
4	RENA G. HUGHES, being first duly sworn, deposes and says:
5	That the is the Respondent in the above-entitled action; that the has read the foregoing Verified
6	Response and Answer and knows the contents thereof; that the same is true of herown knowledge
7	except for those matters therein contained stated upon information and belief; and as to those matters,
9	the believes them to be true.
10	RENA G. HUGHES
11	SUBSCRIBED and SWORN to before me this 25 day of October, 2017.
12	Notary Public - State of Nevada County of Clark CASSIE I. HALEY
13	NOTARY PUBLIC in and for said No: 00-61459-1 February 18, 2018
14	County and State
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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of October, 2017, I, as an employee of WILLIAM B. TERRY, CHARTERED, caused to be served via email and by first class mail, a copy of the foregoing VERIFIED RESPONSE AND ANSWER with postage fully prepaid thereon, by depositing the same with the U.S. Postal Service, addressed as follows:

> Thomas C. Bradley, Esq. 448 Hill Street Reno, Nevada 89501 Tom@TomBradleyLaw.com Prosecuting Officer