

SUPREME COURT OF NEVADA

Williams v. Second Judicial District Court of the State of Nevada

142 Nev. Adv. Op. No. 5 (Nev. 2026) · No. No. 90071 · Decided January 29, 2026

SUMMARY

The Nevada Supreme Court holds that the district judge's conduct did not establish disqualifying actual judicial bias under the heightened standard applicable to bias arising from judicial proceedings. However, exercising its supervisory authority, the court concludes that reassignment is warranted because the judge prematurely and repeatedly found the defendant guilty, undermining the appearance of fairness and the presumption of innocence. The petition is therefore granted in part and denied in part, and the case must be reassigned to a different district judge.

CASE DETAILS

COURT	Supreme Court of Nevada
WRITING FOR THE COURT	Pickering, J.; Cadish, J.; Lee, J.
JURISDICTION	Supreme Court of Nevada
DECIDED	January 29, 2026
DOCKET	No. 90071
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Original petition for a writ of mandamus challenging the denial of a motion to disqualify the presiding district judge for bias in a criminal proceeding and seeking reassignment to a different judge.
STANDARD OF REVIEW	A district judge's decision not to recuse is reviewed for abuse of discretion. Claims of bias arising solely from the judicial proceedings are evaluated under the Liteky standard, requiring deep-seated favoritism or antagonism that makes fair judgment impossible. Reassignment under the court's supervisory authority is evaluated under the Robin factors.
PRECEDENTIAL VALUE	published
PARTIES	Thomas Lamont Williams v. The Second Judicial District Court of the State of Nevada, in and for the County of Washoe, The Honorable Kathleen A. Sigurdson, The Honorable David A. Hardy

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QUESTIONS PRESENTED

1. Whether the district court judge was required to be disqualified for actual judicial bias based on findings and comments in an order denying severance.
2. Whether the Nevada Supreme Court could order reassignment under its supervisory authority even though the evidence did not establish disqualifying judicial bias.
3. Whether reassignment was warranted under the Robin factors because the district court's premature and repeated findings compromised the appearance of justice and the presumption of innocence.

HOLDINGS

1. The district court judge was not required to be disqualified for actual judicial bias because the record did not demonstrate deep-seated favoritism or antagonism so extreme that fair judgment was impossible.
2. Even absent statutorily disqualifying judicial bias, the Nevada Supreme Court may invoke its constitutional supervisory authority to order reassignment in exceedingly rare cases when reassignment is necessary to preserve public confidence and trust in the fairness of the proceeding.
3. Reassignment was warranted because the district court's premature, unsupported, and repeatedly stated findings of guilt compromised the appearance of justice and threatened the presumption of innocence.

KEY QUOTATIONS

"We hold that even in the absence of statutorily disqualifying judicial bias, our supervisory authority may be invoked in exceedingly rare cases where reassignment is necessary to preserve public confidence and trust in the fairness of a judicial proceeding." (1)

"Subjecting Williams to proceedings in which a judge has already found him guilty—and repeatedly went out of her way to make that finding explicit—would hollow out the guarantees of due process, most vitally the presumption of innocence, "a basic component of a fair trial under our system of criminal justice." (10)

FACTUAL BACKGROUND

Police found Brandon McGaskey's body in the apartment he shared with Williams. Williams told police he had shot McGaskey twice in self-defense during an argument, while the State later asserted in opposing severance that Williams possessed both methamphetamine and fentanyl, despite preliminary-hearing testimony identifying only methamphetamine. In denying severance, Judge Sigurdson repeatedly characterized the killing as murder and expressly rejected Williams's self-defense claim before he had an opportunity to present his defense. Judge Sigurdson declined to correct or explain those findings after Williams sought disqualification.

PROCEDURAL HISTORY

Williams was charged in district court with murder with use of a firearm, unlawful possession of a firearm by a prohibited person, possession of methamphetamine, and being a habitual criminal. After the district court denied his motion to sever the drug charge in an order containing repeated findings that he committed murder and was not acting in self-defense, Williams moved to disqualify Judge Sigurdson. Judge Hardy denied the disqualification motion, finding no deep-seated favoritism or antagonism. Williams then petitioned the Nevada Supreme Court for mandamus relief. The Supreme Court denied relief based on actual judicial bias but granted relief under its supervisory authority and ordered reassignment.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

The clerk of the Nevada Supreme Court was directed to issue a writ of mandamus instructing the Second Judicial District Court to reassign the criminal matter to a different district judge for further proceedings. The request to mandate Judge Sigurdson's disqualification for actual judicial bias was denied.

CASES CITED

- Canarelli v. Eighth Judicial District Court, 138 Nev. 104, 506 P.3d 334 (2022)
- Towbin Dodge, LLC v. Eighth Judicial District Court, 121 Nev. 251, 112 P.3d 1063 (2005)
- Kirksey v. State, 112 Nev. 980, 923 P.2d 1102 (1996)
- Millen v. Eighth Judicial District Court, 122 Nev. 1245, 148 P.3d 694 (2006)
- Ybarra v. State, 127 Nev. 47, 247 P.3d 269 (2011)
- Liteky v. United States, 510 U.S. 540 (1994)
- Cameron v. State, 114 Nev. 1281, 968 P.2d 1169 (1998)
- United States v. Young, 45 F.3d 1405 (10th Cir. 1995)
- United States v. Wecht, 484 F.3d 194 (3d Cir. 2007)
- United States v. Robin, 553 F.2d 8 (2d Cir. 1977)
- United States v. Simon, 393 F.2d 90 (2d Cir. 1968)
- United States v. Jacobs, 855 F.2d 652 (9th Cir. 1988)
- California v. Montrose Chemical Corp. of California, 104 F.3d 1507 (9th Cir. 1997)
- United States v. Peguero, 367 Fed. App'x 170 (2d Cir. 2010)
- In re International Business Machines Corp., 45 F.3d 641 (2d Cir. 1995)
- Wickliffe v. Sunrise Hospital, Inc., 104 Nev. 777, 766 P.2d 1322 (1988)
- Fortunet, Inc. v. Playbook Publishing, LLC, No. 72930, 2019 WL 2725664 (Nev. June 25, 2019)
- Valley Health System, LLC v. Eighth Judicial District Court, No. 84330, 2022 WL 1788220 (Nev. June 1, 2022)
- W. Cab Co. v. Eighth Judicial District Court, 133 Nev. 65, 390 P.3d 662 (2017)
- Watters v. State, 129 Nev. 886, 313 P.3d 243 (2013)

- Estelle v. Williams, 425 U.S. 501 (1976)
- United States v. Tucker, 404 U.S. 443 (1972)

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