

SUPREME COURT OF NEVADA

Field Effect Security Inc. v. Eighth Judicial District Court
(Anderson)

141 Nev., Adv. Op. 63 (2025) · No. 89495 · Decided December 4, 2025

SUMMARY

The Nevada Supreme Court denied Field Effect Security Inc.'s petition for a writ of mandamus challenging orders denying summary judgment and a motion to strike a jury demand. The court held that NRS 613.010 permits an employee to pursue a civil claim based on a change in place of employment, even without a change in residence, and concluded that the district court did not manifestly abuse its discretion in denying the motion to strike the jury demand.

CASE DETAILS

COURT	Supreme Court of Nevada
WRITING FOR THE COURT	Justice Cadish; Justice Pickering; Justice Lee
JURISDICTION	Supreme Court of Nevada
DECIDED	December 4, 2025
DOCKET	89495
DISPOSITION	writ_denied
PROCEDURAL POSTURE	Field Effect Security Inc. filed an original petition for a writ of mandamus challenging the district court's denial of its motion for summary judgment and motion to strike Eric Anderson's jury demand.
STANDARD OF REVIEW	Statutory interpretation is reviewed de novo. A writ of mandamus may issue when a district court has manifestly abused its discretion or acted arbitrarily or capriciously; mandamus is extraordinary, and review of summary-judgment denials is generally disfavored absent a clear legal issue and no factual dispute.
PRECEDENTIAL VALUE	Published Nevada Supreme Court opinion; precedential
PARTIES	Field Effect Security Inc. v. Eighth Judicial District Court of the State of Nevada, in and for Clark County, The Honorable Susan Johnson, District Judge, Eric Anderson, individually

TOPICS

employment law

statutory interpretation

writ of certiorari

summary judgment

appellate procedure

PRACTICE AREAS

employment law

civil procedure

contracts

QUESTIONS PRESENTED

1. Whether NRS 613.010 authorizes a civil cause of action when an employee changes places of employment but does not physically relocate or change residence.
2. Whether the district court manifestly abused its discretion by denying Field Effect's motion for summary judgment.
3. Whether the district court manifestly abused its discretion by denying Field Effect's motion to strike Anderson's jury demand based on a contractual jury-trial waiver.

HOLDINGS

1. NRS 613.010 authorizes a civil cause of action when a worker changes their place of employment in response to an employer's false or deceptive representations concerning the terms and conditions of employment, even if the worker does not physically relocate or change their place of abode, provided the statute's other requirements are satisfied.
2. The district court correctly denied Field Effect's motion for summary judgment, and Field Effect was not entitled to mandamus relief.
3. The district court did not manifestly abuse its discretion by determining that Field Effect waived its challenge to Anderson's jury demand.

KEY QUOTATIONS

“Reading NRS 613.010(1) and (3) in harmony, we conclude that changing a place of employment satisfies the requirements for a civil claim under NRS 613.010.” (6)

“Using the whole-text canon of statutory interpretation, we conclude that NRS 613.010 authorizes a civil cause of action when a worker changes his or her place of employment in response to an employer's false or deceptive representations about the terms and conditions of employment, even if the worker does not physically relocate.” (10)

FACTUAL BACKGROUND

Field Effect hired Eric Anderson for a marketing and sales role after he worked for Field Effect's competitor. Although Anderson changed places of employment, he lived at the same Las Vegas address before, during, and after his employment with Field Effect. Anderson alleged that Field Effect lured him with false promises about his position and compensation structure, and he filed a claim under NRS 613.010.

PROCEDURAL HISTORY

Anderson sued Field Effect under Nevada's employment-luring statute, NRS 613.010, alleging that Field Effect induced him to leave a competitor through false promises concerning his position and compensation. The district court denied Field Effect's motion for summary judgment, concluding that the statute applied even though Anderson did not change residences, and later denied Field Effect's motion to strike Anderson's jury demand based on a contractual jury-trial waiver. The Nevada Supreme Court exercised its discretion to entertain the mandamus petition and denied relief as to both orders.

DISPOSITION

writ_denied

CASES CITED

- Smith v. Eighth Judicial District Court, 107 Nev. 674, 677, 679, 818 P.2d 849, 851, 853 (1991)
- Pan v. Eighth Judicial District Court, 120 Nev. 222, 228, 88 P.3d 840, 844 (2004)
- Scarbo v. Eighth Judicial District Court, 125 Nev. 118, 121, 206 P.3d 975, 977 (2009)
- Heights of Summerlin, LLC v. Eighth Judicial District Court, 140 Nev., Adv. Op. 65, 556 P.3d 959, 962 (2024)
- ANSE, Inc. v. Eighth Judicial District Court, 124 Nev. 862, 867, 192 P.3d 738, 742 (2008)
- Clark County v. Eighth Judicial District Court, 141 Nev., Adv. Op. 31, 570 P.3d 135, 140 (2025)
- Lowe Enterprises Residential Partners, L.P. v. Eighth Judicial District Court, 118 Nev. 92, 97, 40 P.3d 405, 408 (2002)
- International Game Technology, Inc. v. Second Judicial District Court, 124 Nev. 193, 198, 179 P.3d 556, 559 (2008)
- Reif v. Aries Consultants, Inc., 135 Nev. 389, 391, 449 P.3d 1253, 1255 (2019)
- In re Estate of Murray, 131 Nev. 64, 67, 344 P.3d 419, 421 (2015)
- Cornella v. Justice Court of New River Township, 132 Nev. 587, 594, 377 P.3d 97, 102 (2016)
- Wyman v. State, 125 Nev. 592, 607, 217 P.3d 572, 583 (2009)
- Tough Turtle Turf, LLC v. Scott, 139 Nev. 459, 462, 537 P.3d 883, 886 (2023)
- Seput v. Lacayo, 122 Nev. 499, 502, 134 P.3d 733, 735 (2006)
- Severson v. Absolute Dental Group, LLC, No. 2:22-cv-01916-GMN-VCF, 2023 WL 2772004 (D. Nev. Apr. 1, 2023)
- Turner v. Harvard MedTech of Nevada, LLC, No. 2:22-CV-1264 JCM (BNW), 2023 WL 9954982, at *3 (D. Nev. July 27, 2023)
- In re Cay Clubs, 130 Nev. 920, 927, 340 P.3d 563, 568 (2014)
- State v. Eighth Judicial District Court (Armstrong), 127 Nev. 927, 932, 267 P.3d 777, 780 (2011)