KAREN A. CONNOLLY Nevada Bar No. 4240

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Attorney for Dontae Hudson

Electronically Filed Jul 06 2016 04:00 p.m. Tracie K. Lindeman Clerk of Supreme Court

#### IN THE SUPREME COURT OF THE STATE OF NEVADA

DR. SHERA D. BRADLEY, Petitioner,

Petitione vs.

THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK; AND THE HONORABLE DOUGLAS W. HERNDON, DISTRICT JUDGE,

Respondents,

and
DONTAE HUDSON, AN
INDIVIDUAL; AND THE STATE
OF NEVADA, BY AND THROUGH
STEVEN B. WOLFSON, IN HIS
OFFICIAL CAPACITY AS
DISTRICT ATTORNEY FOR THE
COUNTY OF CLARK,
Real Parties in Interest.

No. 70522

# REQUEST TO FILE EXHIBITS UNDER SEAL

COMES NOW, KAREN A. CONNOLLY, of the law firm of KAREN A.

CONNOLLY, LTD., attorney of record for Real Party in Interest, DONTAE

request.seal.wpd

HUDSON, and hereby respectfully submits this REQUEST TO FILE EXHIBITS UNDER SEAL.

DATED this \_\_\_\_\_ day of July 2016.

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Las Vegas, NV 89146 Telephone: (702) 678-6700 Attorney for Dontae Hudson

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#### **MEMORANDUM**

Defendant Dontae Hudson has been charged by way of Information with First Degree Kidnapping (Category A Felony - NRS 200.310, 200.320 - NOC 50053); Sex Trafficking of a Child Under 16 Years of Age (Category A Felony - NRS 201.300.2a1 - NOC 58003); Child Abuse, Neglect or Endangerment (Category B Felony - NRS 200.508(1) - NOC 55226) and Living from the Earnings of a Prostitute (Category D Felony - NRS 201.320 - NOC 51006).

On June 9, 2016, Dr. Shera Bradley filed a Petition for Writ of Prohibition or, Alternatively, Mandamus in Supreme Court.

On June 15, 2016, this Court directed the real parties in interest, which includes Dontae Hudson, who is represented by undersigned counsel, to file an answer to the Petition for Writ of Prohibition or, Alternatively, Mandamus. The writ challenges an order of the district court directing Bradley to provide treatment records of the alleged victim in a criminal case for an in camera review.

Exhibits pertinent to the answer to the writ to be filed by Hudson contain confidential juvenile records. Therefore, Hudson requests that they be filed under seal.

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A copy of all exhibits referenced in the answer will be submitted in a separate envelope.

day of July 2016.

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Telephone: (702) 678-6700
Attorney for Dontae Hudson

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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of KAREN A. CONNOLLY, LTD., and on the \_\_\_\_\_ day of July 2016, I served a true and correct copy of the above and foregoing **REQUEST TO FILE EXHIBITS UNDER SEAL** pursuant to NRCP 5 by the method or methods indicated below:

by depositing the same in the U.S. Mail, First Class Mail, with postage fully prepaid, at Las Vegas, Nevada, addressed as follows:

Steven B. Wolfson Clark County District Attorney 200 Lewis Avenue Las Vegas, NV 89101

The Honorable Douglas W. Herndon Eighth Judicial District Court, Dept. 3 200 Lewis Ave. Las Vegas, NV 89155

Kathleen Bliss, Esq. Jason Hicks, Esq. KATHLEEN BLISS LAW PLLC 400 S. 4th St., Suite 500 Las Vegas, Nevada 89101

by electronic service via eFlex:

Steven B. Wolfson Clark County District Attorney

The Honorable Douglas W. Herndon Eighth Judicial District Court, Dept. 3

Kathleen Bliss, Esq. Jason Hicks, Esq. KATHLEEN BLISS LAW PLLC

Employee of KAREN A. CONNOLLY, LTD.

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