

DENNIS L. KENNEDY
Nevada Bar No. 1462
STEPHANIE J. GLANTZ
Nevada Bar No. 14878
BAILEY ♦ KENNEDY
8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148-1302
Telephone: 702.562.8820
Facsimile: 702.562.8821
DKennedy@BaileyKennedy.com
SGlantz@BaileyKennedy.com

Attorneys for Appellant
In conjunction with Legal Aid Center of
Southern Nevada Pro Bono Project

IN THE SUPREME COURT OF THE STATE OF NEVADA

ERIC THOMAS MESI,

Appellant,

vs.

VANESSA MARIE MESI, A/K/A
VANESSA MARIE REYNOLDS,

Respondent.

Supreme Court No. 79137

District Court No. D585846

APPELLANT'S MOTION TO REDACT PORTIONS
OF THE JOINT APPENDIX

Appellant Eric Thomas Mesi moves this Court for an Order allowing him
to redact portions of the Joint Appendix, filed concurrently herewith.

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Electronically Filed
Feb 12 2020 01:58 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

1 This Motion is made and based on the papers and pleadings on file and
2 the following Memorandum of Points and Authorities.

3 DATED this 12th day of February, 2020.

4 BAILEY ♦ KENNEDY

5
6 By: /s/ Stephanie J. Glantz
7 DENNIS L. KENNEDY
STEPHANIE J. GLANTZ

8 *Attorneys for Appellant*
9 *In conjunction with Legal Aid Center*
10 *of Southern Nevada Pro Bono Project*

11 **MEMORANDUM OF POINTS AND AUTHORITIES**

12 Pursuant to Rule 3(l) of the Nevada Supreme Court’s Rules Governing
13 Sealing and Redacting of Records (“SRCR”), “[a]ny person may request that
14 the court seal or redact court records for a case that is subject to these rules by
15 filing a written motion” A court may order the records redacted or sealed
16 provided that “the court makes and enters written findings that the specific
17 sealing or redaction is justified by identified compelling privacy or safety
18 interest that outweigh the public interest in access to the court records,” which
19 includes a finding that “[t]he sealing or redaction is permitted or required by
20 federal or state law.” SRCR 3(4)(a).

1 NRS 239B.030 provides that a person shall not include “any personal
2 information about a person on any document that is recorded, filed or
3 otherwise submitted to [a] governmental agency.” Further, NRS 603A.040
4 defines “personal information” as “a natural person’s first name or first initial
5 and last name in combination with . . . [a] social security number . . . [or a]
6 driver’s license number.”

7 Although personal information is included within publicly filed
8 documents in the district court, and thus is part of the record on appeal, to
9 prevent further disclosure of such personal information, the parties have agreed
10 to redact such information from the Joint Appendix. The Joint Appendix in its
11 redacted form is being filed concurrently herewith, containing redactions on
12 the following pages:

13 1 JA 99

14 2 JA 235

15 2 JA 467

16 2 JA 529

17 3 JA 615

18 3 JA 677

19 In order to further the compelling privacy interests encompassed by
20 NRS 239B.030 and NRS 603A.040, which outweigh the public interest in

1 access to this information, and good cause appearing, the Court should grant
2 this Motion in its entirety, thereby permitting the parties to redact the
3 appropriate information within the Joint Appendix.

4 DATED this 12th day of February, 2020.

5 BAILEY ❖ KENNEDY

6
7 By: /s/ Stephanie J. Glantz

8 DENNIS L. KENNEDY

9 STEPHANIE J. GLANTZ

10 *Attorneys for Appellant*

11 *In conjunction with Legal Aid Center*
12 *of Southern Nevada Pro Bono Project*
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CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ♦ KENNEDY and that on the 12th day of February, 2020, service of the foregoing **APPELLANT'S MOTION TO REDACT PORTIONS OF THE JOINT APPENDIX** was made by electronic service through Nevada Supreme Court's electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

A. JILL GUINGCANGCO, ESQ.

WOLF RIFKIN SHAPIRO

SCHULMAN & RABKIN, LLP

3556 E. Russell, 2nd Floor

Las Vegas, Nevada 89120

Attorneys for Respondent

VANESSA MARIE MESI, A/K/A

VANESSA MARIE REYNOLDS

/s/ Susan Russo

Employee of BAILEY ♦ KENNEDY