## IN THE SUPREME COURT OF THE STATE OF NEVADA 1 2 DENNIS VINCENT STANTON, **Supreme Court Case No.: 80910** District Court Case Network of Notice District Case Network Of Network Of Notice District Case Network Of Network O 3 Appellant/Cross-Respondent, Feb 09 2021 12:21 p.m. 4 VS. Elizabeth A. Brown Clerk of Supreme Court 5 TWYLA MARIE STANTON, 6 Respondent/Cross-Appellant. 7 MOTION TO SEAL 8 Appellant/Cross-Respondent Dennis Vincent Stanton, by and through his 9 undersigned counsel, hereby files this Motion to Seal. 10 Dated this 9th of February 2021. 11 HOLLEY DRIGGS 12 /s/ John J. Savage 13 John J. Savage, Esq. (NV Bar 11455) E-mail: jsavage@nevdafirm.com 14 400 South Fourth Street, Third Floor Las Vegas, Nevada 89101 15 Telephone: 702/791-0308 Facsimile: 702/791-1912 16 Attorney for Appellant Dennis Vincent Stanton 17 18 MEMORANDUM OF POINTS AND AUTHORITIES 19 The Nevada Rules for Sealing and Redacting Court Records ("SRCR") 20 govern the sealing of court records in civil actions. See SRCR 1(2). However, the 21 SRCR provides exceptions for domestic relations matters pursuant to NRS Chapters 22 125 (Dissolution). See SRCR 1(4). 23 24

25

	1	
	2	
	3	
	4	
	5	
	6	
	7	
	8	
	9	
1	0	
1	1	
1	2	
1	3	
1	4	
1	5	
1	6	
1	7	
1	8	
1	9	
2	0	
2	1	
2	2	
2	3	
2	4	

All papers, records, proceedings and evidence, including exhibits and transcript of the testimony, other than those identified in subsection 1 of NRS 125.110, "**shall**, upon the written request of either party to the action, filed with the clerk, **be sealed** and shall not be open to inspection except to the parties or their attorneys, or when required as evidence in another action or proceeding." *See* NRS 125.110(2) (emphasis added).

Here, NRS 125.110 applies because the underlying appeal is related to a divorce decree. Mr. Stanton is in the process of filing Appellant's Motion for Order Staying Execution of Judgment and Waving Bond ("Motion for Stay"), which Motion for Stay will include private information about his family and their finances.

To protect his privacy and the privacy of his family, Mr. Stanton respectfully requests the Court to allow the Motion for Stay, and all exhibits attached thereto, to be filed under seal pursuant to NRS 125.110(2).

## **CONCLUSION**

Based on the foregoing, Mr. Stanton respectfully request the Court to grant his Motion to Seal and seal his Motion for Stay.

Dated this 9th of February 2021.

## **HOLLEY DRIGGS**

25

## **CERTIFICATE OF SERVICE**

2 I hereby certify that on the 9th day of February, 2021, I served a true and correct copy of MOTION TO SEAL upon all Counsel of record: 3 (ELECTRONIC SERVICE) The above-referenced document was 4 electronically filed on the date hereof and served through the Notice of Electronic 5 Filing automatically generated by that Court's facilities. 6 (UNITED STATES MAIL) By depositing a copy of the above-7 referenced document for mailing in the United States Mail, first class postage 8 prepaid, at Las Vegas, Nevada, to: 9 Professor Anne Traum 10 Chair of Pro Bono Committee Appellate Section of State Bar of Nevada 11 UNLV William S. Boyd School of Law 4505 S. Maryland Parkway, Box 451003 12 Las Vegas, Nevada 89154-1003 13 Kelly H. Dove, Esq. 14 Co-chair of Pro Bono Committee Snell & Wilmer, LLP 15 3883 Howard Hughes Parkway, Ste. 1100 Las Vegas, Nevada 89169 16 17 /s/ Kathy MacElwain 18 EMPLOYEE OF HOLLEY DRIGGS 19

20

1

21

22

23

24

25 | 14337-01/2554939