## IN THE SUPREME COURT OF THE STATE OF NEVER DA

MAY 18 2021

DEPUTY CLERK
No. 82295

TRAVIS BISH,

Appellant,

VS.

THE JUSTICE COURT FOR SPARKS TOWNSHIP, THE HON. JESSICA LONGLEY, BY AND THROUGH REAL PARTY IN INTEREST THE STATE OF NEVADA,

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## MOTION TO FILE SEALED EXHIBITS UNDER SEAL

Appellant Travis Bish requests that this Court file under seal Exhibits 2 and 4 to Petitioner's Emergency Petition for Writ of Habeas Corpus or in the Alternative, a Writ of Mandamus; and Request for Emergency Hearing, both of which were filed under seal in district court case number CR20-2911. A true and correct copy of each of these exhibits is contained in the Supplemental Joint Appendix which accompanies this motion.

 DATED this 14th day of May 2021.

JOHN L. ARRASCADA Washoe County Public Defender

By://

Kathryn Reynolds

Deputy Public Defender

Nevada State Bar No. 10955

## **DECLARATION OF COUNSEL**

- I, Kathryn Reynolds, pursuant to NRS 53.045, declare under penalty of perjury that the following is true and correct:
- 1. I am a licensed Nevada attorney and I am counsel for appellant Travis Bish.
- 2. On May 10, 2021, I filed an Opening Brief in the above captioned matter that references Exhibit 2 (arrest report and declaration of probable cause) and Exhibit 4 (Nevada Pretrial Risk Assessment) that accompanied Mr. Bish's Emergency Petition for Writ of Habeas Corpus or in the Alternative, a Writ of Mandamus; and Request for Emergency Hearing in the district court. Each of these exhibits contain sensitive personal identifying information, and were filed under seal by the district court.

- 3. Accompanying this motion to file under seal is a Joint Supplemental Appendix containing each of these exhibits.
- 5. I respectfully request that this Court file the attached Joint Supplemental Appendix under seal in this appeal.
- 6. This motion is made in good faith and not for the purposes of delay.

Dated this 14th day of May 2021.

KATHRYN REYNOLDS

## CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Washoe County Public Defender's Office, Reno, Washoe County, Nevada, and that on this date I deposited the original and two copies of the attached document in the United States mail, postage prepaid, and addressed to:

> Elizabeth Brown, Clerk of the Court The Nevada Supreme Court 201 South Carson Street Carson City, Nevada 89701-4702

I further certify that on this date I emailed a true and correct copy of the attached document (marked "confidential") to:

Jennifer P. Noble, Chief Appellate Deputy Washoe County District Attorney's Office

DATED this 14th day of May 2021.

Kathryn Reynolds

Washoe County Public Defender's Office