

STEPHEN S. KENT, ESQ.  
Nevada State Bar No. 1251  
GORDON REES SCULLY MANSUKHANI  
201 W. Liberty St., Ste. 320  
Reno, Nevada 89501  
Telephone: (775) 324-9800  
Facsimile: (775) 324-9803  
Attorneys for Appellant

Electronically Filed  
Oct 25 2021 06:03 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

PIERRE A. HASCHEFF,

**Supreme Court No Case No.:82626**

District Court Case No. DV13-00656

Appellant/Cross-  
Respondent,

vs.

LYNDA HASCHEFF,

Respondent/Cross-  
Appellant.

**APPELLANT'S MOTION TO SEAL OPENING**  
**BRIEF AND APPENDIX THAT CONTAIN**  
**QUOTES AND REFERENCES TO, AND**  
**PLEADINGS AND TRANSCRIPTS**  
**PREVIOUSLY ORDERED SEALED**

Appellant moves the court to seal Appellant's Opening Brief and the Appendix that contains references to, quotes of, and copies of pleadings and transcripts previously ordered sealed by the District Court ordered sealed on October 14, 2013, by the District Court..

### **INTRODUCTION**

This appeal involves private, confidential information regarding the parties 2013 divorce, with no public interest. The pleadings, orders and transcripts from the District Court were sealed by that Court in an Order dated October 14, 2013. These pleadings, transcripts and order do contain private, confidential information regarding the parties' divorce with no public interest. Appellant and his counsel, through this motion, seek to comply with the District Court's Order. It is also Appellant's counsel's understanding that Respondent/Cross Respondent, desires to keep this information sealed. Appellant's counsel does not have access to the District Court Electronic Document System for this case. Good cause exists to keep sealed from public view Appellant's Opening Brief and Appendix.

### **MEMORANDUM OF POINTS AND AUTHORITIES**

Pursuant to the Nevada Supreme Court Order Adopting Rules for Sealing and Redacting Court Records, ADKT. No. 410, filed December 31, 2007, Rule 3(4)(e) and Rule 3(4)(h) state, in pertinent part:

- (e) The sealing or reaction is of the confidential terms of a settlement agreement of the parties;

- (f) The sealing or redaction is justified or required by another identified compelling circumstance.

Additionally, Nevada Supreme Court Order Adopting Rules for Sealing and Redacting Court Records, ADKT. No. 410, Rule 3(2) states:

2. When a motion to seal or redact a court record has been filed, the information to be sealed or redacted remains confidential for a reasonable period of time until the court rules on the motion.

The District Court, on October 14, 2013, ordered that all pleadings, transcripts, orders and proceeding be sealed. The Appendix contains documents all sealed by the District Court.

The Opening Brief contains quotes and references to pleadings that were sealed by the District Court. These pleadings do contain confidential information about the parties' divorce. Also, Appellant and his counsel do not want to violate the District Court Order sealing proceedings.

Appellant requests, therefore, that this Opening Brief and Appendix that both contain quotes, references, and District Court Order, transcripts, pleadings that were sealed, that are also private, confidential information be sealed as it has no public interest or public information, including pleadings, orders and transcripts that are already sealed by the District Court. It is Appellant's counsels understanding that Respondent/Cross Appellant and her counsel also seek to keep the brief and appendix sealed.

### CONCLUSION

For all these reasons, Appellant requests the Opening Brief and Appendix Volumes 1 through 4 be sealed. Appellant, pursuant to this Court's October 18, 2021 Order, is mailing his Opening Brief and Appendix to the Court.


### AFFIRMATION

The undersigned hereby declares that the within document does not contain the Social Security Number of any person.

DATED this 25th day of October, 2021.

GORDON REES SCULLY  
MANSUKHANI

By:

  
STEPHEN S. KENT, ESQ.  
Nevada State Bar No. 1251  
201 W. Liberty St., Ste. 320  
Reno, Nevada 89501  
Telephone: (775) 324-9800  
Facsimile: (775) 324-9803

## CERTIFICATE OF SERVICE

Pursuant to Rule 25(b) of the Nevada Rules of Appellate Procedure, I hereby certify that I am an employee of Gordon Rees Scully Mansukhani and that on this date, I served a true and correct copy of the attached document as follows:

\_\_\_\_\_ By placing the document(s) in a sealed envelope with first-class US. Postage prepaid, and depositing for mailing at Reno, Nevada, addressed to the person at the last known address as set forth below.

  √   Electronic Filing states that the attached document will be electronically mailed; otherwise, an alternative method will be use.

\_\_\_\_\_ By personally delivering the document(s) listed above, addressed to the person at the last known address as set forth below.

Debbie A. Leonard, Esq.  
Nevada State Bar No. 8260  
Leonard Law, PC  
955 S. Virginia Street, Suite 220  
Reno, Nevada 89502  
Attorneys for Respondent/  
Cross-Appellant

DATED this 25 day of October, 2021.

  
\_\_\_\_\_  
Holly Mitchell