

IN THE SUPREME COURT OF THE STATE OF NEVADA

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Case No. 82626

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Elizabeth A. Brown
Clerk of Supreme Court

PIERRE A. HASCHEFF,

Appellant/Cross-Respondent,
vs.

LYNDA L. HASCHEFF,

Respondent/Cross-Appellant.

Appeal From Special Order Entered After Final Judgment
Second Judicial District Court Case No. DV13-00656

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

LEONARD LAW, PC
Debbie Leonard (#8260)
955 S. Virginia St., Suite #220, Reno, NV 89502
775-964-4656
debbie@leonardlawpc.com

Attorney for Respondent/Cross-Appellant

POINTS AND AUTHORITIES

Appellant Pierre Hascheff's "Motion to Seal Opening Brief and Appendix That Contain Quotes and References to, and Pleadings and Transcripts Previously Ordered Sealed" is too broad and does not overcome the presumption that favors public access to court documents.

"[T]here exists a presumption in favor of public access to records and documents filed in this [C]ourt." *Howard v. State*, 128 Nev. 736, 744, 291 P.3d 137, 142 (2012). "[T]his presumption may be abridged only where the public right of access is outweighed by a significant competing interest." *Id.* "[T]he party seeking to seal a record or document carries the burden of demonstrating sufficient grounds for denying access." *Id.*

Pierre does not identify specific documents that contain "private, confidential information" nor does he explain why the sealing of limited documents or redaction of certain documents would not adequately protect such information. *See* SRCR 3(4)(h), 3(5)(b). Although there is some financial information in the appendix provided to the district court as part of the parties' divorce that Respondent Lynda Hascheff agrees should probably remain sealed (1AA005-015), the vast majority of the appendix consists of post-divorce proceedings related to the interpretation of an indemnity provision in the parties' Marital Settlement Agreement.

The case is largely one of contract interpretation that should not be hidden from the public. Pierre has not demonstrated otherwise. For that reason, Lynda respectfully opposes Pierre's Motion.

DATED November 1, 2021

LEONARD LAW, PC

By: /s/ Debbie Leonard

Debbie Leonard (NV Bar No. 8260)

955 S. Virginia Street, Suite 220

Reno, Nevada 89502

Phone: (775) 964-4656

debbie@leonardlawpc.com

*Attorney for Respondent/
Cross-Appellant*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Leonard Law, PC, and that on November 1, 2021, a copy of the foregoing document was electronically filed with the Clerk of the Court for the Nevada Supreme Court by using the Nevada Supreme Court's E-Filing system (E-Flex). The following participants who are registered as E-Flex users will be served by the EFlex system upon filing. All others will be served by first-class mail.

Stephen S. Kent
Gordon Rees Scully Mansukhani
201 W. Liberty Street, Ste. 320
Reno, NV 89501
skent@grsm.com

/s/ Tricia Trevino
An employee of Leonard Law, PC