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Electronically Filed
Jun 23 2022 10:20 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

11 **IN THE SUPREME COURT OF THE STATE OF NEVADA**

13 IN THE MATTER OF THE
14 GUARDIANSHIP OF: KATHLEEN
15 JUNE JONES, PROTECTED PERSON.

Supreme Court No.: 83967

16
17 KATHLEEN JUNE JONES,

18 Appellant,

19 vs.

20 ROBYN FRIEDMAN; AND DONNA
21 SIMMONS,

22 Respondents,

23 **MOTION TO SEAL PORTIONS OF APPELLANT'S APPENDIX**

24 Kathleen June Jones, Appellant, by and through counsel, Scott Cardenas,
25 Esq. and Elizabeth Mikesell, Esq., of Legal Aid Center Of Southern Nevada,
26 Inc., hereby submits this Motion to Seal Portions of Appellant's Appendix, and
27
28

requests that this Court seal documents in this appeal that were filed
confidentially in the guardianship case before the district court.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. DISCUSSION**

3 NRAP 27(a)(1) states that “[a]n application for an order or other relief is
4 made by motion unless these Rules prescribe another form.” No rule in the NRAP
5 provides for the confidential filing of portions of the appendix. NRAP 27(a)(2)
6 then provides that any motion shall “state with particularity the grounds for the
7 motion, the relief sought, and the legal argument necessary to support it.”
8

9 Here, Appellant seeks to seal certain portions of her appendix that contain
10 documents that were filed confidentially in the guardianship matter before the
11 district court and documents that contain medical information. The documents that
12 Appellant requests to seal are documents that are routinely filed confidentially
13 before the district court as a matter of course with no litigation that takes place to
14 seal these documents in the guardianship matter, or documents that contain medical
15 information regarding Appellant. Appellant requests that this Court seal the
16 following portions of Appellant’s Appendix:
17

- 18
- 19 • AA00001–00006 (Confidential Physician’s Certificate of Incapacity
20 and Medical Records)
 - 21 • AA00542–00549 (Confidential Report of AOC Investigator)
- 22

23 These documents were filed confidentially before the district court in the
24 guardianship matter. AA0010–0006 contains sensitive medical information
25

1 regarding June's diagnosis, level of needs in regards to activities of daily living,
2 and details concerning her alleged "incapacity." AA0-00542-00549 is a report
3 from a court-appointed investigator that was filed confidentially with the district
4 court. June respectfully requests that these documents be sealed in this appeal
5 considering that they were filed confidentially before the district court and contain
6 sensitive medical information about June.
7

8
9 Simultaneous with the filing of this motion, Appellant will mail the
10 abovementioned proposed sealed documents to the Supreme Court of Nevada
11 Clerk's Office.
12

13 **V. CONCLUSION**
14

15 Accordingly, this Court should grant Appellant's request to seal the
16 abovementioned portions of Appellant's Appendix.
17

18
19 DATED this 23rd day of June, 2022.
20

21 **LEGAL AID CENTER OF**
22 **SOUTHERN NEVADA, INC.**

23 /s/ Scott Cardenas

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Elizabeth Mikesell, Las Vegas, NV, as counsel for Appellant

Scott Cardenas, Las Vegas, NV, as counsel for Appellant

Jeffrey Sylvester, Las Vegas, NV, as counsel for Respondent

David Snyder, Las Vegas, NV, as counsel for Respondent

John Michaelson, Henderson, NV, as counsel for Respondent

Micah Echols, Las Vegas, NV, as counsel for Respondent

/s/ Jennifer Bocek-Dobijanski
An employee of Legal Aid Center of
Southern Nevada