IN THE SUPREME COURT OF THE STATE OF NEVADA

MICHAEL A. TRICARICHI,

Appellant,

v.

PRICEWATERHOUSECOOPERS, LLP,

Respondent.

Electronically Filed
Mar 28 2024 03:18 PM
Elizabeth A. Brown
Clerk of Supreme Court
Supreme Court No. 86317

District Court Case No.

A-16-735910-B

APPEAL From the Eighth Judicial District Court The Honorable Joanna S. Kishner District Judge

MOTION TO FILE UNDER SEAL

SNELL & WILMER L.L.P.
Kelly H. Dove (#10569)
kdove@swlaw.com
Patrick G. Byrne (NV Bar #7636)
pbyrne@swlaw.com
Bradley Austin (NV Bar #13064)
baustin@swlaw.com
3883 Howard Hughes Parkway, #1100
Las Vegas, Nevada 89169
Tel: 702.784.5200

BARTLIT BECK LLP
Mark Levine (*Pro Hac Vice*)
mark.levine@bartlitbeck.com
Christopher Landgraff (*Pro Hac Vice*)
chris.landgraff@bartlitbeck.com
Katharine Roin (*Pro Hac Vice*)
kate.roin@bartlitbeck.com
Alexandra Genord (*Pro Hac Vice*)
alexandra.genord@bartlitbeck.com
54 West Hubbard Street, Suite 300
Chicago, Illinois 60654
Tel: 312.494.4400

Sundeep (Rob) Addy
(Pro Hac Vice)
rob.addy@bartlitbeck.com
Daniel Taylor
(Pro Hac Vice)
daniel.taylor@bartlitbeck.com
1801 Wewatta Street, Suite 1200
Denver, Colorado 80202

Tel: 303.592.3100; Fax: 303.592.3140 Attorneys for PricewaterhouseCoopers LLP

Appellee, PricewaterhouseCoopers LLP ("PwC"), moves to file a limited portion of its Response to Tricarichi's Emergency Motion to Stay Enforcement Pending Appeal Without Bond, as well as supporting Exhibits 1, 3, and 4 under seal. The unredacted copy of the Response and the Exhibits have been mailed separately.

Under SRCR 3, "[a]ny person may request that the court seal or redact court records for a case that is subject to these rules by filing a written motion." Here, PwC's Response contains information from Mr. Tricarichi's January 15, 2024 judgment debtor exam transcript ("Debtor Exam Transcript"). During the exam, counsel for Mr. Tricarichi designated the entire Debtor Exam Transcript as confidential pursuant to a Protective Order entered in the district court. As such, PwC seeks to file the portions of its Response under seal that contain testimony or information from the Debtor Exam Transcript.

PwC also files the accompanying Exhibits 1, 3, and 4 under seal. Exhibit 1 is the Debtor Exam Transcript, which should be sealed for the same reasons as portions of the Response. Exhibit 3 is a 2019 asset disclosure form and Exhibit 4 is a 2023 asset disclosure form. Mr. Tricarichi's counsel also designated these exhibits as confidential.

As to not run afoul of the Protective Order, PwC files these materials under seal. PwC defers to this Court as to whether any or all of this material should remain sealed.

DATED: March 28, 2024

SNELL & WILMER L.L.P.

/s/ Kelly H. Dove

(Counsel list continued on next page)
Patrick G. Byrne (Nevada Bar #7636)
Kelly H. Dove (Nevada Bar #10569)
Bradley T. Austin (Nevada Bar #13064)
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169

BARTLIT BECK LLP

Mark L. Levine
(Admitted *Pro Hac Vice*)
Christopher D. Landgraff
(Admitted *Pro Hac Vice*)
Katharine A. Roin
(Admitted *Pro Hac Vice*)
Alexandra R. Genord
(Admitted *Pro Hac Vice*)
54 West Hubbard Street, Suite 300
Chicago, Illinois 60654

Sundeep K. (Rob) Addy (Admitted *Pro Hac Vice*) Daniel C. Taylor (Admitted *Pro Hac Vice*) 1801 Wewatta Street, Suite 1200 Denver, Colorado 80202

Attorneys for PricewaterhouseCoopers LLP

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On March 28, 2024, I caused to be served a true and correct copy of the foregoing **MOTION TO FILE UNDER SEAL** upon the following by the method indicated:

- BY E-MAIL: by transmitting via e-mail the document(s) listed above to the e-mail addresses set forth below and/or included on the Court's Service List for the above-referenced case.
- BY ELECTRONIC SUBMISSION: submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
- BY U.S. MAIL: by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below:

/s/ Maricris Williams

An Employee of SNELL & WILMER L.L.P.

4872-1320-2098