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7 Nevada Attorneys for Criminal Justice

**FILED**

JAN 22 2002

JY JANETTE M. BLOOM  
CLERK OF SUPREME COURT  
DEPUTY CLERK

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

9 THE STATE OF NEVADA,

Petitioner

Appeal No. 38987

10 vs.

11 THE EIGHTH JUDICIAL DISTRICT COURT  
12 OF THE STATE OF NEVADA IN AND FOR  
13 THE COUNTY OF CLARK COUNTY, AND  
14 THE HONORABLE MARK W. GIBBONS,  
15 DISTRICT JUDGE,

Respondents,

16 and

17 ALFRED P. CENTOFANTI, III,

18 Real Party In Interest.

19 **MOTION OF NEVADA ATTORNEYS FOR CRIMINAL JUSTICE**  
20 **FOR LEAVE TO FILE AMICUS CURIAE BRIEF**

21  
22 The Nevada Attorneys for Criminal Justice, by and through its attorney JoNell  
23 Thomas, hereby moves, pursuant to Rules 2 and 28 of the Nevada Rules of Appellate  
24 Procedure, for leave to appear as amicus curiae and to file the accompanying Amicus

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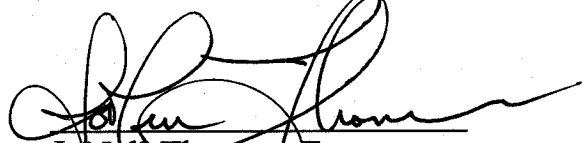
JANETTE M. BLOOM  
CLERK OF SUPREME COURT  
DEPUTY CLERK

02-01459

1 Curiae Brief. This motion is based upon the attached memorandum of points and  
2 authorities and the brief submitted to the clerk in conjunction with this motion.

3 Dated this 17th day of January, 2002.

4 Respectfully submitted,

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7 Jo Nell Thomas, Esq.  
8 Nevada Bar No. 4771  
9 616 South 8th Street  
10 (702) 471-6565  
11 Counsel for Amicus Curiae  
12 Nevada Press Association  
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1 until the time of formal waiver of his right to confidentiality, or whether he may be  
2 forced to relinquish that right by listing psychiatric experts as potential witnesses for  
3 trial. For each of these reasons, it is appropriate for Amicus to appear.

4 3. Substantiality of Issues

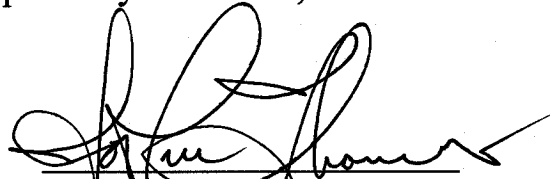
5 The necessity of involvement of an amicus curiae is not based merely upon  
6 abstract policy considerations but arises from the substantial nature of the  
7 constitutional and statutory issues presented in this case.

8 4. Conclusion

9 The Nevada Attorneys for Criminal Justice respectfully submits that this Court  
10 should grant leave to file the accompanying Brief and permit participation by amicus  
11 curiae.

12 Dated this 17th day of September, 2002.

13 Respectfully submitted,

14 

15 JoNell Thomas, Esq.

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20 Counsel for Amicus Curiae

21 Nevada Attorneys for Criminal Justice  
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The Honorable Chief Judge Mark E. Gibbons  
District Court Department VII  
200 South Third Street  
Las Vegas, NV 89155

  
JoNell Thomas