

1 **PET**
Joel E. Tasca
2 Nevada Bar No. 14124
Justin A. Shiroff
3 Nevada Bar No. 12869
BALLARD SPAHR LLP
4 100 North City Parkway, Suite 1750
Las Vegas, Nevada 89106-4617
5 Telephone: (702) 471-7000
Facsimile: (702) 471-7070
6 E-Mail: tasca@ballardspahr.com
E-Mail: shiroffj@ballardspahr.com
7

8 Attorneys for American Broadcasting Companies,
Inc., The Associated Press, Cable News Network, Inc.,
9 Chesapeake Media I, LLC, d/b/a KSNV-TV, Los
Angeles Times Communications, LLC, The New York
10 Times Company, and WP Company LLC d/b/a The
Washington Post
11

12 **DISTRICT COURT**

13 **CLARK COUNTY, NEVADA**

14 IN RE: SEALED SEARCH WARRANT
RECORDS RELATED TO STEPHEN CRAIG
15 PADDOCK OR THE CRIMES COMMITTED
OCTOBER 1, 2017 AT THE ROUTE 91
16 HARVEST COUNTRY MUSIC FESTIVAL

Search Warrant Nos.
17-971A, B, C, & D; 17-988; 17-989; 17-
17-990; 17-991; 17-992; 17-993; 17-994;
17-995; 17-996; 17-998
A-17-764028-W

Dept. No. Department 24

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20 **PETITION TO UNSEAL SEARCH WARRANT RECORDS**

21 American Broadcasting Companies, Inc. (“ABC”), the Associated Press (“AP”), Cable
22 News Network, Inc. (“CNN”), Chesapeake Media I, LLC, d/b/a KSNV-TV (“KSNV-TV”), the
23 Los Angeles Times Communications, LLC (“*Los Angeles Times*”), the New York Times
24 Company (“*New York Times*”), and the WP Company LLC d/b/a The Washington Post (“*The*
25 *Washington Post*”) (collectively “Petitioners”), by their undersigned counsel, hereby petition this
26 Court to unseal the affidavits of probable cause, transcripts of oral statements, and applications
27 filed in support of the search warrants issued by this Court in connection with the investigation of
28 the Route 91 Harvest Country Music Festival shooting. This petition is based on Nev. Rev. Stat.

BALLARD SPAHR LLP
100 NORTH CITY PARKWAY, SUITE 1750
LAS VEGAS, NEVADA 89106
(702) 471-7000 FAX (702) 471-7070

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179.045(4), the following memorandum of points and authorities, the papers on file, further evidence to be presented, and any oral argument entertained by the Court.

Dated this 1st day of November, 2017.

BALLARD SPAHR LLP

By: /s/ Justin A. Shiroff
Joel E. Tasca
Nevada Bar No. 14124
Justin A. Shiroff
Nevada Bar No. 12869
100 North City Parkway, Suite 1750
Las Vegas, Nevada 89106-4617

Attorneys for American Broadcasting Companies, Inc., The Associated Press, Cable News Network, Inc., Chesapeake Media I, LLC, d/b/a KSNV-TV Los Angeles Times Communications, LLC, The New York Times Company, and the WP Company LLC d/b/a The Washington Post

BALLARD SPAHR LLP
100 NORTH CITY PARKWAY, SUITE 1750
LAS VEGAS, NEVADA 89106
(702) 471-7000 FAX (702) 471-7070

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NOTICE OF PETITION

Please take notice that the undersigned will bring the foregoing Petition to Unseal Search Warrant Records for hearing before the above-entitled Court on the 7 day of **XXIV** **December**, 2017, at the hour of 9:00 o'clock a.m. on said date, in Department __, or as soon afterwards as counsel can be heard.

Dated: November 1, 2017.

BALLARD SPAHR LLP

By: _____

Joel E. Tasca
Nevada Bar No. 14124
Justin A. Shiroff
Nevada Bar No. 12869
100 North City Parkway, Suite 1750
Las Vegas, Nevada 89106

Attorneys for American Broadcasting Companies, Inc., The Associated Press, Cable News Network, Inc., Chesapeake Media I, LLC, d/b/a KSNV-TV Los Angeles Times Communications, LLC, The New York Times Company, and the WP Company LLC

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 Introduction

3 A month ago, on October 1, 2017, Stephen Paddock perpetrated the worst mass shooting in
4 this nation’s history when he opened fire on a crowded music festival in Las Vegas. Before taking
5 his own life, he killed 58 people and wounded more than 500 more.

6 In the days following the massacre, local law enforcement authorities obtained and
7 executed at least 14 search warrants in connection with the investigation. The search warrants are
8 broad, authorizing the authorities to search and seize people, cars, computer hard drives,
9 telephones, and other items found at Mr. Paddock’s home in Mesquite and at the Mandalay Bay
10 Hotel, and to obtain information from Verizon and Google related to specified
11 telecommunications devices. On information and belief, all of the search warrants issued by this
12 Court have been executed and are on file with the Court, along with inventories and the
13 applications supporting those warrants.

14 In response to multiple media requests for the search warrants and their related records,
15 this Court has released the search warrants and the inventories. The Court has, however,
16 maintained under seal the applications for the search warrants, including the affidavits and
17 transcripts of oral statements of probable cause.

18 Petitioners respectfully request that the Court unseal these search warrant records. Under
19 both the First Amendment and Nevada common law, the public (including Petitioners) enjoys a
20 right to access and copy judicial records on file with this Court. That right may be overcome only
21 upon an evidentiary showing that it is outweighed by a “significant” and “overriding” competing
22 interest *and* that no less restrictive means – short of blanket sealing for unspecified duration – is
23 available that will adequately protect that interest.

24 The law enforcement authorities in charge of the investigation into this massacre have
25 repeatedly announced that Stephen Paddock, who is deceased, was – and remains – *the only*
26 *suspect*.¹ In this circumstance – where there is no information the government must maintain as

27 ¹ See, e.g., Press Release of Oct. 2, 2017, Las Vegas Metro. Police Dep’t (“The Las Vegas
28 Metropolitan Police Department identified *the lone suspect* involved in the late night mass

(continued...)

1 confidential in order to apprehend, charge and prosecute criminals – there is no “significant
2 competing interest” that can overcome the public’s extraordinary interest in understanding and
3 evaluating its government’s response to the shooting. Accordingly, the search warrant
4 applications on file with this Court, including affidavits and oral statements of probable cause,
5 should be immediately unsealed.

6 **Argument**

7 **I. Petitioners Have The Right to Seek Access to the Search Warrant Records**

8 Each of the Petitioners is engaged in gathering news and other information on matters of
9 public concern and disseminating it, on various platforms—print, broadcast, cable, internet and
10 mobile devices—to the general public.² One significant aspect of the October 1 mass shooting
11 that continues to be the focus of their reporting concerns the activities of state, local and federal
12 law enforcement agents, as well as the judicial system, in response to those crimes.

13 The Nevada Supreme Court has held that “the public and the press have the right to seek
14 limited intervention in a criminal case to advance or argue constitutional claims concerning access
15 to court proceedings.” *Stephens Media, LLC v. Eighth Judicial Dist. Ct.*, 125 Nev. 849, 860, 221
16 P.3d 1240, 1248 (2009); *see also id.* at 859, 221 P.2d at 1247 (recognizing that “the public or press
17 [may] intervene for the limited purpose of accessing a criminal proceeding or court documents”).³

18
19 _____
20 (...continued)
21 shooting on the Las Vegas Strip”) (emphasis added), [https://www.lvmpd.com/en-
22 us/Press%20Releases/PO%20235%2010-02-17.pdf](https://www.lvmpd.com/en-us/Press%20Releases/PO%20235%2010-02-17.pdf); Richard Winton, *From the 32nd Floor, Las
23 Vegas Gunman Caused Mass Carnage Despite Security Measures at Concert*, L.A. Times (Oct. 2,
24 2017) (“Authorities said they believe Stephen Paddock, 64, acted alone”),
<http://www.latimes.com/local/lanow/la-na-shooting-las-vegas-sniper-tactics-20171002-story.html>;
Associated Press, *Laptop in Las Vegas Shooter’s Suite Was Missing Hard Drive*, N.Y. Times (Oct.
25, 2017) (“Police and the FBI have said they believe he acted alone.”),
<https://www.nytimes.com/aponline/2017/10/25/us/ap-us-las-vegas-shooting-costs.html>.

25 ² A full description of each of the Petitioners is set forth in Appendix A hereto.

26 ³ Because no criminal case has been initiated, a motion to “intervene” in an ongoing
27 judicial proceeding is inappropriate here. Nevertheless, the right of members of the press – such
28 as Petitioners – to seek the unsealing of judicial records is well established through the precedent
cited in this Petition.

1 Accordingly, Petitioners appear before this Court on their own behalf, as members of the
2 public, to assert the rights afforded them by the Constitution of the United States, the Nevada State
3 Constitution, all applicable statutes, and the common law to obtain access to the search warrant
4 records. *See Globe Newspaper Co. v. Super. Ct.*, 457 U.S. 596, 609 n.25 (1982) (recognizing
5 press’ right to be heard prior to closure of criminal trial); *Phoenix Newspapers, Inc. v. U.S. Dist.*
6 *Ct.*, 156 F.3d 940, 949 (9th Cir. 1998) (holding that the press must be afforded an opportunity to
7 object to closure of court proceedings); *Stephens Media*, 125 Nev. at 859, 221 P.2d at 1247
8 (recognizing press’ right to seek access to court documents on file in a criminal case before trial).
9 They also appear on behalf of the broader public that receives the news and information that they
10 gather and disseminate. *See, e.g., Stephens Media*, 125 Nev. at 860, 221 P.3d at 1248 (“[T]he
11 press often acts as a proxy for the public, advancing the public’s understanding and awareness of
12 the criminal justice system.”); *Richmond Newspapers, Inc. v. Virginia*, 448 U.S. 555, 573-74
13 (1980) (in providing coverage of court proceedings, the print and electronic media function “as
14 surrogates for the public”).

15 **II. Both the First Amendment and Nevada Common Law Provide a Right of Access to**
16 **Judicial Records on File in This Court**

17 Both the First Amendment and the common law protect the public’s right of access to
18 judicial proceedings and records. *See Richmond Newspapers, Inc.*, 448 U.S. 555 at 577 (Burger,
19 C.J.) (right of access is “assured by the amalgam of the First Amendment guarantees of speech and
20 press” and their “affinity to the right of assembly”); *id.* at 585 (Brennan, J., concurring) (First
21 Amendment secures “a public right of access”); *Del Papa v. Steffen*, 112 Nev. 369, 374, 915 P.2d
22 245, 248 (1996) (recognizing First Amendment right of access to criminal and civil judicial
23 proceedings, as these places are “traditionally open to the public”); *Howard v. State*, 291 P.3d 137,
24 142, 144-45 (Nev. 2012) (finding common law right of access to sealed criminal pleadings related
25 to motion for substitution of counsel, and describing common law right of access as being
26 “broader than the other sources of that right – constitutions and statutes”); *Paddock v. Nev.*
27 *Property I, LLC*, No. A-12-668412-C, slip op. at 5 (Nev. Dist. Ct., Clark Cty. Oct. 23, 2017)

1 (“The First Amendment protects the right of the press to access court proceedings. This
2 constitutional protection extends to public records, i.e., those in the court file.”)

3 As the Nevada Supreme Court explained in *Howard*, access to records filed in connection
4 with criminal proceedings is just as important as access to those proceedings themselves:

5 Openness and transparency are the cornerstones of an effective, functioning
6 judicial system. Safeguarding those cornerstones requires public access not only
7 to judicial proceedings but also to an equally important aspect of the judicial
8 process—judicial records and documents. For that reason, long-standing English
and American tradition recognizes public access to judicial records and
documents[.]

9
10 291 P.3d at 139 (citations omitted); *accord, e.g., Stephens Media*, 125 Nev. at 860-61, 221 P.3d at
11 1248-49 (ordering disclosure of unredacted juror questionnaires to media petitioners under First
12 Amendment right of access); *Chicago Tribune Co. v. Bridgestone/Firestone, Inc.*, 263 F.3d 1304,
13 1311 (11th Cir. 2001) (“Beyond establishing a general presumption that criminal and civil actions
14 should be conducted publicly, the common-law right of access includes the right to inspect and
15 copy public records and documents.”).

16 Under the First Amendment or under Nevada common law, the Court applies essentially
17 the same standard to determine whether the right of access to judicial records has been overcome
18 in a particular case. Both impose a substantial burden on any party requesting sealing (or
19 opposing unsealing), and both require the reviewing court to enter specific findings that any
20 sealing is warranted and no broader than absolutely necessary.

21 Specifically, under the First Amendment, the proponent of continued sealing must
22 establish, and the Court must expressly find, that “(1) [sealing] serves a compelling interest; (2)
23 there is a substantial probability that, in the absence of [sealing], this compelling interest would be
24 harmed; and (3) there are no alternatives to [sealing] that would adequately protect the compelling
25 interest.” *Phoenix Newspapers*, 156 F.3d at 949 (citation omitted); *accord Stephens Media*, 125
26 Nev. at 862, 221 P.3d at 1249 (right of access to court records in criminal cases “may be overcome
27 only by an overriding interest based on findings that closure is essential to preserve higher values
28 and is narrowly tailored to serve that interest” (quoting *Press-Enterprise Co. v. Super. Ct.*, 464

1 U.S. 501, 509 (1984)). These findings must be “specific” and made “on the record,” and any order
2 of sealing must be “[no] broader than necessary.” *Id.* at 863, 221 P.3d at 1250.

3 Similarly, under this state’s common law, the “presumption in favor of public access to
4 records and documents” on file in the court “may be abridged only where the public right of
5 access is outweighed by a significant competing interest.” *Howard*, 291 P.3d at 142. The party
6 seeking to maintain a judicial record under seal “carries the burden of demonstrating sufficient
7 grounds for denying access,” must “specify the duration” of the sealing urged, and “must explain
8 why less restrictive means will not adequately protect the material.” *Id.* at 142-43.

9 **III. The Petitioners’ Right of Access to the Search Warrant Records Cannot Be**
10 **Overcome Here**

11 As set forth below, many courts have held that either the First Amendment right of access,
12 the common law right of access, or both, extend to the kind of judicial records Petitioners seek
13 here. Indeed, the Eighth Judicial District Court has ordered release of these precise types of
14 records even where an investigation technically remained ongoing, as here.

15 **A. The Right of Public Access Extends to the Search Warrant Records**

16 Although the appellate courts in Nevada have not yet reached the issue, numerous courts,
17 including the Eighth Judicial District Court, have ordered public access to search warrant records
18 – including applications, affidavits of probable cause, and returns – whether under the First
19 Amendment, the common law, or both. *See, e.g., In re Search Warrant for Secretarial Area*
20 *Outside Office of Gunn*, 855 F.2d 569, 572-74 (8th Cir. 1988) (“*Gunn*”) (recognizing First
21 Amendment right of access to search warrant affidavits and other materials supporting search
22 warrant applications); *Balt. Sun Co. v. Goetz*, 886 F.2d 60, 64-65 (4th Cir. 1989) (recognizing
23 common law right of access to search warrant records); *In re Newsday*, 895 F.2d 74, 79 (2d Cir.
24 1990) (same); *In re Search Warrants Issued in Connection with Investigation of Death of Michael*
25 *Jackson*, No. A-09-601140-C, slip op. at 2 (Nev. Dist. Ct., Clark Cty. Nov. 20, 2009) (“*Jackson*”)
26 (courtesy copy attached as Appendix B) (unsealing search warrant and affidavit during criminal
27 investigation into Michael Jackson’s death); *see also* Erica A. Kaston, Note, *The Expanding Right*
28

1 *of Access: Does it Extend to Search Warrant Affidavits?*, 58 Fordham L. Rev. 655, 661 (1990)
2 (“Kaston”) (cited by *Howard*, 291 P.3d at 140).

3 As the U.S. Court of Appeals for the Eighth Circuit recognized, access to such materials
4 serves salutary purposes:

5 [T]he first amendment right of public access does extend to the documents filed in
6 support of search warrant applications. First, although the process of issuing
7 search warrants has traditionally not been conducted in an open fashion, search
8 warrant applications and receipts are routinely filed with the clerk of court
9 without seal. Under the common law[,] judicial records and documents have been
10 historically considered to be open to inspection by the public. Second, public
11 access to documents filed in support of search warrants is important to the
12 public’s understanding of the function and operation of the judicial process and
13 the criminal justice system and may operate as a curb on prosecutorial or judicial
14 misconduct.

15 *Gunn*, 855 F.2d at 573 (citations omitted). *See also, e.g.*, *Kaston* at 671 (“[i]f affidavits are made
16 public, the people swearing them out would be more conscientious about being absolutely
17 truthful”).

18 The United States District Court for the District of Arizona relied on the Eighth Circuit’s
19 reasoning in another recent high profile shooting case under circumstances similar to those
20 presented here. In *United States v. Loughner*, the court found that the First Amendment required
21 the unsealing of the warrant affidavits issued in the wake of the shooting of a United States
22 Congresswoman and the killing of a federal judge and five others, by Jared Lee Loughner, even
23 though the investigation had not concluded. 769 F. Supp. 2d 1188 (D. Ariz. 2011). The court
24 recognized that once the investigation into the identity of the only responsible party was
25 effectively completed (authorities had announced that no further charges were to be filed), “[t]here
26 [was] no real danger at [that] point that disclosure of the warrant materials [would] jeopardize the
27 investigation.” *Id.* at 1191. The court also observed that there was both a tradition of providing
28 public access to such records in such circumstances, and a strong public function performed by
providing access: “Public scrutiny of the search warrant process . . . can shed light on how and
why a warrant was obtained, and thereby further the public’s interest in understanding the justice
system.” *Loughner*, 769 F. Supp. 2d at 1194 (emphasis added). “Permitting inspection of the

1 search warrants [and] the accompanying affidavits . . . will further public understanding of the
2 response of government officials,” the court observed, “and allow the public to judge whether law
3 enforcement functioned properly and effectively[.]” *Id.*

4 The *Loughner* court quoted extensively from Chief Justice Burger’s opinion for the Court
5 in *Richmond Newspapers*, which explains in more detail why the public needs to understand what
6 law enforcement is doing in the *immediate* aftermath of an enormous tragedy:

7 When a shocking crime occurs, a community reaction of outrage and public
8 protest often follows. Thereafter the open processes of justice serve an important
9 prophylactic purpose, providing an outlet for community concern, hostility, and
emotion. . . .

10 The crucial prophylactic aspects of the administration of justice cannot function in
11 the dark; no community catharsis can occur if justice is done in a corner or in any
12 covert manner. . . . [I]t is important that society’s criminal process satisfy the
appearance of justice, and the appearance of justice can best be provided by
allowing people to observe it.

13 *Richmond Newspapers*, 448 U.S. at 571-572 (internal marks, alterations and citations omitted).

14 The Eighth Judicial District Court, too, has recognized the salutary effects of providing
15 access to search warrant records when, as here, there is no compelling reason to maintain them
16 under seal. In the criminal investigation into singer Michael Jackson’s death, the court unsealed a
17 search warrant and its underlying affidavit after a deputy attorney, in an *in camera* interview, “was
18 unable to articulate a specific reason why the search warrant and affidavit . . . should be kept
19 sealed or explain how the subject investigation would be compromised by unsealing.” *Jackson*,
20 slip op. at 2.

21 **B. The Petitioners’ Right of Access Has Not Been, and Cannot Be, Overcome**

22 Here, no party has demonstrated that the continued blanket sealing of the search warrant
23 records is necessary to protect a “compelling interest” and “essential to preserve higher values.”
24 The law enforcement authorities in charge of the criminal investigation have publicly declared that
25 the shooter, Stephen Paddock, acted alone.⁴ Although aspects of that investigation are still
26 ongoing, law enforcement officials cannot credibly claim that a search for further suspects – the

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28 ⁴ See *supra* at 5 n.1.

1 primary reason why investigations are kept confidential – will be harmed if these records are
2 unsealed. *See supra* at 5 n.1.

3 Under these circumstances, the government cannot meet its burden of establishing a
4 substantial probability that disclosure of the affidavit materials poses a substantial probability of
5 harm to a “compelling,” “significant” and “overriding” state interest. Accordingly, under both the
6 First Amendment and Nevada’s common law, the public is entitled to access the search warrant
7 records.

8 **C. Less Restrictive Means – Other Than Blanket Sealing – Are Available**

9 Even if the Court were to find (on the record, with specific findings, as the First
10 Amendment and Nevada law require) that disclosure of the search warrant records presents a
11 substantial likelihood of interference with an ongoing investigation, the Court must then further
12 find that no alternative means, less restrictive than blanket sealing of the records, would
13 adequately protect that interest. *See Richmond Newspapers*, 448 U.S. at 580-81 (holding that
14 order closing a courtroom violated the First Amendment where “no inquiry was made as to
15 whether alternative solutions would have met the need to ensure fairness”); *Press-Enterprise Co.*
16 *v. Super. Ct.*, 478 U.S. 1, 14 (1986) (holding that trial court had committed constitutional error
17 because it “failed to consider whether alternatives short of complete closure would have protected
18 the interests of the accused”); *Howard*, 291 P.3d at 142-43 (party requesting seal “must explain
19 why less restrictive means will not adequately protect the material”). This Court must therefore
20 treat the blanket sealing of the search warrant records as a last resort – only after analyzing
21 reasonable alternatives, including redaction, and concluding that none of them is sufficient to
22 protect the overriding interest at stake. *See, e.g., id.* at 143 n.4 (citing SRCR 3(5)(b), (c) and
23 SRCR 3(6) in criminal case and ruling that “sealing of an entire court file is prohibited and . . .
24 should the court order sealing, it ‘shall use the least restrictive means and duration’”); *see also,*
25 *e.g., Kasza v. Whitman*, 325 F.3d 1178, 1181 (9th Cir. 2003) (where release of court records poses
26 risk to national security, “[p]ublic release of redacted material is an appropriate response”); *In re*
27 *NBC*, 828 F.2d 340, 346-47 (6th Cir. 1987) (vacating order sealing pleadings and exhibits, and
28 remanding for consideration of less restrictive alternatives); *Publicker Indus., Inc. v. Cohen*, 733

1 F.2d 1059, 1074 (3d Cir. 1984) (district court abused discretion where it “failed to consider less
2 restrictive means to keep this information from the public”).

3 Here no showing has been made, nor could it be, that sealing of the search warrant records
4 *in their entirety* is necessary to protect an interest more important than the public’s right to inspect
5 judicial records reflecting the government’s response to the mass shooting that occurred here one
6 month ago. Accordingly, at a minimum, release of redacted versions of these documents is
7 required.

8 **Conclusion**

9 The public has a compelling interest in learning as much as possible about the
10 government’s response to the deadliest mass shooting in this nation’s history. Only by observing
11 the activities of law enforcement and the courts can the public assure itself that its government’s
12 response was (and is) appropriate, lawful and effective. This interest is both paramount and
13 urgent.⁵ Accordingly, Petitioners respectfully request that the Court immediately unseal the
14 applications, affidavits and oral statements of probable cause, and returns for all search warrants
15 related to the October 1 mass shooting that issued from this Court.

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17 *(Remainder of Page Intentionally Left Blank)*
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25 ⁵ See *supra* at 5 n.1; see also, e.g., *Globe Newspaper Co. v. Pokaski*, 868 F.2d 497, 507 (1st
26 Cir. 1989) (“even a one to two day delay impermissibly burdens the First Amendment”); *Lugosch*
27 *v. Pyramid Co. of Onondaga*, 435 F.3d 110,126-27 (2d Cir. 2006) (“Our public access cases and
28 those in other circuits emphasize the importance of *immediate* access where a right of access is
found.” (emphasis added) (citations omitted)); *Grove Fresh Distribs., Inc. v. Everfresh Juice Co.*,
24 F.3d 893, 897 (7th Cir. 1994) (public access to documents in court’s file “should be immediate
and contemporaneous”).

BALLARD SPAHR LLP
100 NORTH CITY PARKWAY, SUITE 1750
LAS VEGAS, NEVADA 89106
(702) 471-7000 FAX (702) 471-7070

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Dated this 1st day of November, 2017.

BALLARD SPAHR LLP

By: /s/ Joel E. Tasca

Joel E. Tasca
Nevada Bar No. 14124
Justin A. Shiroff
Nevada Bar No. 12869
100 North City Parkway, Suite 1750
Las Vegas, Nevada 89106-4617

Attorneys for American Broadcasting Companies,
Inc., The Associated Press, Cable News Network,
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Los Angeles Times Communications, LLC, The
New York Times Company, and WP Company
LLC

1 **APPENDIX A**

2 1. Petitioner American Broadcasting Companies, Inc., alone or through its
3 subsidiaries, owns and operates, *inter alia*, ABC News, abcnews.com, and local broadcast
4 television stations which regularly gather and report news to the public. Programs produced and
5 disseminated by ABC News include *World News with Diane Sawyer*, *20/20*, *Nightline*, *Good*
6 *Morning America*, and *This Week*. It is based at 47 W. 66th St., New York, NY 10023.

7 2. Petitioner the Associated Press (“AP”) is a news cooperative organized under the
8 Not-for-Profit Corporation Law of New York, and is owned by its 1,500 U.S. newspaper
9 members. The AP’s members and subscribers include the nation’s newspapers, magazines,
10 broadcasters, cable news services and Internet content providers. The AP operates from 300
11 locations in more than 100 countries. On any given day, AP’s content can reach more than half of
12 the world’s population. The AP’s corporate headquarters are located at 200 Liberty St., New York,
13 NY 10281. The AP also maintains a local Las Vegas office at 300 S. 4th St. #810, Las Vegas, NV
14 89101.

15 3. Petitioner Cable News Network, Inc. (“CNN”) is a subsidiary of Turner
16 Broadcasting System, Inc., a Time Warner Inc. company. CNN is a portfolio of two dozen news
17 and information services across cable, satellite, radio, wireless devices and the Internet in more
18 than 200 countries and territories worldwide. CNN is based at One CNN Center, Atlanta, GA
19 30303.

20 4. Petitioner Chesapeake Media I, LLC, d/b/a KSNV-TV owns and operates the
21 KSNV-TV television station, which is the Las Vegas affiliate of The National Broadcasting
22 Company. It is headquartered at 10706 Beaver Dam Road, Hunt Valley, MD 21030. The KSNV-
23 TV station address is 1500 Foremaster Lane, Las Vegas, NV 89101.

24 5. Petitioner Los Angeles Times Communications LLC, a subsidiary of tronc, inc.,
25 publishes the Los Angeles Times, California’s largest newspaper, and a number of smaller
26 community papers. The Times’ website, www.latimes.com, is a leading source of California,
27 national and international news. Los Angeles Times Communications LLC is based at 202 W. 1st
28 St., Los Angeles, CA 90012.

BALLARD SPAHR LLP
100 NORTH CITY PARKWAY, SUITE 1750
LAS VEGAS, NEVADA 89106
(702) 471-7000 FAX (702) 471-7070

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6. Petitioner The New York Times Company is the owner of *The New York Times* and the *International New York Times*, formerly the *International Herald Tribune*, and operates the news website www.nytimes.com. The New York Times Company is based at 620 Eighth Avenue, New York, NY 10018.

7. Petitioner WP Company LLC d/b/a *The Washington Post* publishes one of the nation's most prominent daily newspapers, as well as a website, www.washingtonpost.com, that is read by an average of more than 20 million unique visitors per month. WP Company LLC is based at 1150 15th Street NW, Floor 11, Washington, DC 20017.

DISTRICT COURT CIVIL COVER SHEET

CLARK

County, Nevada

Case No. _____
(Assigned by Clerk's Office)

I. Party Information (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone): American Broadcasting Companies, Inc., The Associated Press; Cable News Network, Inc., Chesapeake Media I, LLC, dba KSNV-TV; Los Angeles Times Communications, LLC, The New York Times Company, and WP Company dba The Washington Post	Defendant(s) (name/address/phone): <p style="text-align: center; font-size: 2em;">N/A</p>
Attorney (name/address/phone): Joel E. Tasca, Esq., Justin A. Shiroff, Esq. Ballard Spahr LLP, 100 N. City Parkway, Suite 1750 Las Vegas, NV 89106 (702) 471-7000	Attorney (name/address/phone): _____ _____ _____

II. Nature of Controversy (please select the one most applicable filing type below)

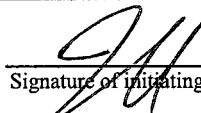
Civil Case Filing Types

<p style="text-align: center;">Real Property</p> <p>Landlord/Tenant</p> <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant <p>Title to Property</p> <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property <p>Other Real Property</p> <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	<p style="text-align: center;">Negligence</p> <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence <p style="text-align: center;">Malpractice</p> <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	<p style="text-align: center;">Torts</p> <p style="text-align: center;">Other Torts</p> <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
<p style="text-align: center;">Probate</p> <p><i>Probate (select case type and estate value)</i></p> <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate <p>Estate Value</p> <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	<p style="text-align: center;">Construction Defect & Contract</p> <p>Construction Defect</p> <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect <p>Contract Case</p> <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	<p style="text-align: center;">Judicial Review/Appeal</p> <p>Judicial Review</p> <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency <p>Nevada State Agency Appeal</p> <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency <p>Appeal Other</p> <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
<p style="text-align: center;">Civil Writ</p> <p>Civil Writ</p> <input type="checkbox"/> Writ of Habeas Corpus <input checked="" type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant		<p style="text-align: center;">Other Civil Filing</p> <p>Other Civil Filing</p> <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters

Business Court filings should be filed using the Business Court civil coversheet.

11/1/17

Date



Signature of initiating party or representative

See other side for family-related case filings.

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IAFD
Joel E. Tasca, Esq.
Nevada Bar No. 14124
Justin A. Shiroff, Esq.
Nevada Bar No. 12869
BALLARD SPAHR LLP
100 North City Parkway, Suite 1750
Las Vegas, NV 89106-4617
Telephone: 702.471.7000
Facsimile: 702.471.7070
tasca@ballardspahr.com
shiroffj@ballardspahr.com

Attorneys for Petitioners
American Broadcasting Companies, Inc., The
Associated Press, Cable News Network, Inc.,
Chesapeake Media I, LLC, d/b/a KSNV-TV,
Los Angeles Times Communications, LLC,
The New York Times Company, and WP
Company LLC d/b/a The Washington Post

DISTRICT COURT
CLARK COUNTY, NEVADA

**IN RE: SEALED SEARCH WARRANT
RECORDS RELATED TO STEPHEN
CRAIG PADDOCK OR THE CRIMES
COMMITTED OCTOBER 1, 2017 AT
THE ROUTE 91 HARVEST COUNTRY
MUSIC FESTIVAL**

CASE NO. _____

**INITIAL APPEARANCE
DISCLOSURE**

Pursuant to NRS Chapter 19, as amended by Senate Bill 106, filing fees are submitted for parties appearing in the above-entitled action as indicated below:

American Broadcasting Companies, Inc.....	\$270.00
The Associated Press	30.00
Cable News Network, Inc.	30.00
Chesapeake Media I, LLC d/b/a KSNV-TV	30.00
Los Angeles Times Communications, LLC	30.00
The New York Times Company	30.00
WP Company, LLC	30.00

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Ballard Spahr LLP
100 North City Parkway, Suite 1750
Las Vegas, NV 89106-4617

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TOTAL REMITTED\$450.00

DATED this 1st day of November, 2017.

Ballard Spahr LLP

By: /s/ Joel E. Tasca
Joel E. Tasca, Esq.
Nevada Bar No. 14124
Justin A. Shiroff, Esq.
Nevada Bar No. 12869
100 North City Parkway, Suite 1750
Las Vegas, NV 89106-4617
Telephone: 702.471.7000
Facsimile: 702.471.7070

Attorneys for Petitioners