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IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF WASHOE

IN THE MATTER OF Case No. PR23-00813
THE DOE 1 TRUST, Dept. No. PR
Petitioner,

_____/

**MOTION TO MAINTAIN UNDER SEAL OR REDACT PORTIONS OF
PLEADINGS, PAPERS, AND OTHER RECORDS**

1 Petitioner K. Rupert Murdoch (“**KRM**”), by and through his undersigned
2 counsel of record, moves the Court pursuant to Rule 3 of the Nevada Supreme
3 Court Rules Governing Sealing and Redacting Court Records, as well as,
4 Nevada Revised Statutes 164.041 and 669A.256, to maintain under seal and/or
5 redact discrete portions of the pleadings, papers, and other records filed in this
6 matter as set forth below. KRM makes this motion to protect his own private
7 information, as well as, that of all parties, other family members, former
8 spouses, employees of Fox Corporation and/or News Corp, journalists and
9 advisors. This Motion is based on the Memorandum of Points and Authorities,
10 all pleadings and papers in this action, and any oral argument the Court may
11 consider.
12

13 Dated this 19th day of February, 2026.
14

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1 related safety concerns, while contributing nothing to the public's
2 understanding of the legal issues presented in this case. These materials should
3 unquestionably be redacted from the record.

4 Similarly, certain filings contain complete copies of or direct quotations
5 from the MSA. The MSA reflects a negotiated resolution of intensely private
6 family and financial matters and were made with the expectation of
7 confidentiality. Public disclosure would defeat that bargained-for confidentiality
8 and expose sensitive financial details.

10 KRM's request is narrowly drawn. He does not seek to shield the
11 substance of the Court's rulings or the core issues presented. Rather, he seeks
12 only the minimum sealing and redaction necessary to protect compelling
13 privacy and safety interests that outweigh any marginal public interest in
14 access to these discrete pieces of information.

16 II.

17 **BACKGROUND**

18 The trust in this matter is domiciled in Nevada and its trustee is a Nevada
19 family trust company under NRS Chapter 669A. KRM filed a verified petition
20 asking the District Court to assume jurisdiction over the trust and to seal
21 confidential information under NRS 164.041 and NRS 669A.256. On January
22 26, 2024, this Court sealed nearly all records and closed all proceedings in the
23 above captioned matter. The Court found that the sealing was appropriate
24 because the filings and proceedings would "reveal confidential personal,
25
26

1 financial, and business information of the Trust and its beneficiaries or other
2 family members who the Trustee serves.” (January 26, 2024, Order Sealing
3 Proceedings and Closing Court Hearings at 2.) Indeed, the record contains
4 sensitive material such as personal email addresses, bank account numbers,
5 and the MSA. The Court determined, “[t]here is no public interest in disclosure
6 of this confidential information.” (*Ibid.*)
7

8 Consistent with the January 2024 Order and after receiving a number of
9 public inquiries, the Clerk of the Court made limited information about this
10 case available to the public via the Second Judicial District Court’s website.
11 For example, the case name, case number, the case type, initiation date, as well
12 as an index of all the documents filed in the case, listed by date and document
13 code. All other information in this case remained sealed.
14

15 On September 4, 2024, several media outlets, including *The New York*
16 *Times*, moved to intervene for the limited purpose of seeking to unseal the
17 records and obtain access to the proceedings. Ultimately, the Court allowed the
18 media to intervene, but found that “together, NRS 164.041 and NRS 669A.256
19 provide[d] (though not expressly) for the sealing of all papers filed in this case.”
20 (September 12, 2024, Recommendation and Order at 9.) The Court explained
21 that the record as a whole includes the “names or addresses of trust settlors
22 and beneficiaries”, not to mention the other categories of information sealed or
23 otherwise made confidential under NRS 164.041, NRS 669A.256 or NRS
24 669A.040. (*Ibid.*) Accordingly, the Court ordered the records sealed, but
25
26

1 permitted disclosure of the names of the judges, attorneys, and parties who
2 were not settlors or beneficiaries. (*Id.* at 11-12.) The Court also ordered the
3 closure of hearings. (*Id.* at 16.)

4 The media companies successfully challenged the Court’s September
5 2024 Order with a writ petition to the Nevada Supreme Court. The Nevada
6 Supreme Court issued an opinion holding that that “NRS 164.041 and NRS
7 669A.256 allow for certain trust-related documents to be sealed provisionally,
8 but the district court must still promptly conduct a proper analysis as to each
9 document to determine whether demonstrated interests overcome the
10 presumption of openness and warrant their continued closure.” (*New York*
11 *Times Company v. Second Judicial District Court in and for County of Washoe*,
12 581 P.3d 427, 436 (2025).)

13
14 Following issuance of the Supreme Court’s opinion and concomitant writ,
15 the District Court vacated the September 2024 Order and remanded the matter
16 to the Commissioner to conduct a “prompt proper analysis and make
17 recommendations for order” to determine whether the records should remain
18 sealed, be unsealed, or redacted. (January 8, 2026, Order on Writ of Mandamus
19 at 1.)

20
21 The Commissioner issued a recommendation on January 14, 2026,
22 providing, among other recommendations, that “[t]wenty-one (21) days from an
23 order confirming this recommendation” the record will be unsealed, “unless and
24 only to the extent that a party moves this Court to maintain the confidentiality
25
26

1 of (or redact) a document, caption, or pseudonym.” (pp. 3-4.) On January 30,
2 2026, the District Court confirmed the recommendation.

3
4 **III.**

5 **ANALYSIS**

6 **A. Legal Standards Governing Motions to Seal or Redact.**

7 Rule 3 of the Nevada Supreme Court Rules Governing Sealing and
8 Redacting Court Records provides the general standard for sealing or redacting
9 records in civil cases in Nevada. The Court may seal or redact records upon its
10 own motion or upon motion of any party “provided the court makes and enters
11 written findings that the specific sealing or redaction is justified by identified
12 compelling privacy or safety interests that outweigh the public interest in access
13 to the court record.” (SRCR, Rule 3.) Rule 3 lists several grounds justifying
14 sealing of court records, including:
15

16 (a) The sealing or redaction is permitted or required by
17 federal or state law;

18 (b) The sealing or redaction furthers ... a protective
19 order entered under NRCP 26(c)...;

20 ...

21 (d) The redaction includes only restricted personal
22 information contained in the court record;

23 (e) The sealing or redaction is of the confidential terms
24 of a settlement agreement of the parties;

25 ...
26

1 (h) The sealing or redaction is justified or required by
2 another identified compelling circumstance.

3 (SRCR, Rule 3(4).)

4 In trust matters, the sealing rules are more expansive. Parties to these
5 matters may avail themselves of sealing statutes such as NRS 164.041 and NRS
6 669A.256. Under NRS 164.041, “[c]onfidential information relating to trusts
7 that is contained in petitions and subsequent related findings ... may be
8 redacted and filed under seal without a prior court order” NRS 164.041(4)
9 provides that “confidential information” includes “[t]rust instruments,
10 inventories, accountings and reports; ... names and addresses of trust settlors
11 and beneficiaries; ... [t]rust dispositive terms, ... [c]orporate and company
12 records relating to trusts; ... [p]ersonally identifying information,” as well as
13 “[a]ny other information the court deems confidential, if the interest in
14 protecting the confidentiality of the information outweighs the public interest
15 in accessing such information.” Unless the Court orders otherwise, the initially
16 redacted information must be redacted and filed under seal in subsequent
17 filings. (NRS 164.041(2).) NRS 669A.256 similarly provides that a settlor may
18 petition the court to order certain trust documents to be sealed.

19
20
21 The Nevada Supreme Court has interpreted these statutes to “allow for
22 provisional sealing of certain documents” and “vest the district court with
23 discretion to determine whether continued sealing is compatible with public
24 access principles.” (*New York Times Co.*, 581 P.3d at 429–430.) This requires,
25
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1 “nonspeculative factual findings to support a significant privacy interest or a
2 substantial probability of harm absent sealing and closure.” (*Id.* at 430.)

3 **B. PII Should Be Redacted.**

4 As noted above, a court may seal or redact material when “[t]he public
5 interest in privacy or safety interests...outweigh[s] the public interest in open
6 court records,” so long as “the redaction includes only restricted personal
7 information contained in the court record.” (SRCR Rule 3(4)(d).) That standard
8 is satisfied with regard to PII, particularly personal email addresses, personal
9 telephone numbers, home addresses, and bank account numbers for all
10 parties, other family members, former spouses, employees of Fox Corporation
11 and/or News Corp, journalists and advisors. These redactions are proper and
12 necessary for five reasons.
13

14
15 *First*, the Nevada Supreme Court recently confirmed that redacting this
16 type of information is appropriate:

17 We acknowledge, of course, the propriety of redacting
18 personal identifying information of litigants, including
19 home addresses, birth dates, social security numbers,
20 bank account numbers, and the like to prevent threats
21 to people and property as well as identity theft.

22 (*New York Times Co.*, 581 P.3d at 435 n.6.) This language is unequivocal. The
23 Court not only approved redaction of bank account numbers and home
24 addresses specifically, but grounded that approval in concrete safety concerns,
25 including threats to persons and property, as well as, identity theft. Email
26 addresses and phone numbers fall comfortably within the same category of

1 personal identifiers that facilitate harassment, stalking, phishing, and financial
2 fraud, particularly when disclosed in the context of a contentious, high-profile
3 family trust dispute.

4 *Second*, Nevada law expressly classifies such information as confidential
5 in the trust context. Under NRS 164.041(4)(e), PII is deemed “confidential
6 information,” reflecting the Legislature’s determination that the privacy and
7 security risks associated with its disclosure are substantial. This statutory
8 designation weighs heavily in favor of redaction because it evidences a
9 recognized privacy interest that, by definition, is not merely speculative.
10

11 *Third*, the balancing required under SRCR Rule 3(4)(d) strongly favors
12 redaction here. The underlying case involves a large trust and intensely
13 personal familial issues, with extensive email communications among family
14 members and parties. Disclosure of direct contact information and account
15 numbers adds nothing to the public’s understanding of the factual or legal
16 issues in this matter, but materially increases the risk of misuse of information.
17 The public interest in transparency is fully preserved through access to the
18 substance of the filings, arguments, and findings. Revealing granular PII does
19 not enhance their understanding of the case or assist in public oversight of the
20 judiciary.
21
22

23 *Fourth*, the redaction of this information also furthers the March 1, 2024,
24 Stipulated Confidentiality Agreement and Protective Order entered under NRCP
25 26(c), which provides “[a]ny Producing Party may redact from the documents or
26

1 things it produces information that the Producing Party claims constitutes
2 sensitive personally identifying information (including passwords, social
3 security numbers, bank account numbers)...” (March 1, 2024, Stipulated
4 Confidentiality Agreement And Protective Order at p. 4, ¶ 7.) This provides
5 additional grounds to seal under Rule 3(4)(b).

6 *Finally*, the requested relief is narrowly tailored. The proposed redactions
7 are limited to the email addresses themselves (not the name of the addressee),
8 personal phone numbers, home addresses, credit card numbers and bank
9 account numbers. Such targeted redaction is the least restrictive means of
10 protecting legitimate privacy and safety interests while maintaining public
11 access to the substance of the proceedings.

12
13 Redaction of PII is therefore appropriate under the circumstances. For
14 the Court’s convenience, Index “B” attached hereto as **Exhibit “2”** (a subset of
15 Index A) identifies the PII KRM seeks to redact.

16
17 **C. The MSA Between KRM and His Former Spouse Should be**
18 **Sealed.**

19 Under SRCR Rule 3(4)(e), a court may seal records including “the
20 confidential terms of a settlement agreement of the parties.” This provision
21 specifically contemplates and authorizes the sealing of the confidential MSA
22 between KRM and his former spouse for four reasons.

23 *First*, unlike generalized sealing requests, Rule 3(4)(e) specifically
24 identifies “the confidential terms of a settlement agreement” as a category
25 warranting protection. By enumerating settlement terms within the rule itself,
26

1 the Nevada legislature has recognized that such agreements often contain
2 uniquely sensitive material, in this instance, financial allocations, asset
3 disclosures, personal and familial arrangements, and negotiated concessions.
4 The MSA reflects KRM's bargained-for resolution of intensely private matters
5 that are not adjudicated findings, but private compromises. Public disclosure
6 would nullify the very confidentiality that formed a material component of the
7 parties' agreement.
8

9 *Second*, the MSA involved the divorce of a high-net-worth couple and
10 contains compromising information. In this context, disclosure of these terms
11 creates heightened risk, including financial exploitation, security concerns,
12 harassment, and reputational harm. Public access to granular financial and
13 personal information of a public figure such as KRM may expose him and his
14 former spouse to targeting, identity-based fraud, or unwanted intrusion. The
15 privacy interest here is not abstract. It is concrete, significant, and amplified by
16 KRM's wealth and public profile.
17

18 *Third*, the public's interest in open court records is satisfied here by
19 access to the docket, the filings, judicial rulings and other records. The
20 negotiated terms of the MSA (a private contract resolving domestic matters) do
21 not meaningfully advance the public's understanding of the Court's reasoning
22 in this matter or aid in judicial oversight.
23

24 *Fourth*, although Rule 3(4)(e) permits "sealing or redaction," and KRM
25 maintains that full sealing is appropriate because the MSA is an integrated
26

1 document containing provisions that are interdependent, KRM alternatively
2 requests that the Court allow redactions of those portions of the MSA that
3 contain confidential financial and property information. KRM does not seek to
4 seal or redact discussions of the terms or impact of the MSA in the record, so
5 the request is narrowly tailored.

6 Sealing the MSA in its entirety is appropriate under the circumstances,
7 but in the alternative, targeted redaction is essential. For the Court's
8 convenience, Index "C" attached hereto as **Exhibit "3"** (a subset of Index A)
9 identifies the copies of the MSA that KRM seeks to seal and any direct quotes
10 from the MSA in the record that KRM seeks to redact.

11 12 **IV.**

13 **CONCLUSION**

14
15 Based on the foregoing, KRM requests that this Motion to Seal be granted,
16 that the aforementioned portions of the record be redacted and documents be
17 filed under seal (as identified in Index A), and that such information remain
18 confidential and protected from public examination in the court record pending
19 disposition of this request. Given the voluminous record, KRM reserves the
20 right, and respectfully requests authorization, to supplement Index A should
21 the parties later identify materials that were inadvertently omitted.
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DATED this 19th day of February, 2026.

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of Maupin, Cox & LeGoy, and on
3 the date indicated below, the electronic filing system will send a Notice of
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7 *Reuters*

8 DATED this 19th day of February, 2026.

9 /s/ Madison Griffing

10 Paralegal

11 *An employee of Maupin, Cox & LeGoy*

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Exhibit Index

Exhibit No.	Description	No. Pages
1	Index A – Records Subject to Motion to Maintain Under Seal or Redact – Personal Identifying Information	92
2	Index B – Records Subject to Motion to Maintain Under Seal or Redact – Bank Account or Credit Card Numbers	88
3	Index C – Records Subject to Motion to Maintain Under Seal or Redact – Confidential Marital Settlement Agreement	2