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*Attorneys for Lachlan Murdoch*

**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

**IN AND FOR THE COUNTY OF WASHOE**

IN THE MATTER OF THE  
DOE 1 TRUST

Case No.: PR23-00813  
Dept. No.: PR

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

Lachlan K. Murdoch (“LKM”), by and through his undersigned counsel of record, hereby joins the Motion to Maintain Under Seal or Redact Portions of Pleadings, Papers, and Other Record (“Motion”) filed by Petitioner K. Rupert Murdoch. This Joinder incorporates the Motion and accompanying Memorandum of Points and Authorities by reference as well as the additional points and authorities set forth below.

Dated this 19th day of February, 2026.

SOLOMON DWIGGINS FREER & STEADMAN, LTD.

By: /s/ Alan D. Freer  
Alexander G. LeVeque (#11183)  
Alan D. Freer (#7706)

*Attorneys for Lachlan K. Murdoch*

## SUPPLEMENTAL POINTS AND AUTHORITIES

In addition to the sealing and redaction requests set forth in the Motion, LKM further requests that the Court maintain under seal the discrete, private information identified in chronological order attached hereto as **LKM Index A**, which includes the trust instruments and certain information and record pertaining to Cruden Financial Services, LLC (“Cruden”) regarding its internal affairs, including its capacity as shareholder of Fox Corporation and News Corporation. These redactions are proper and necessary for the following reasons.

As to the trust instruments, such documents are expressly determined to be “confidential information” under both NRS 164.041 and NRS 669A.256. *See* NRS 164.041(4)(a) and NRS 669A.256(1)(a). The express inclusion of trust instruments as confidential documents reflects the Legislature’s determination that the privacy and security risks associated with their disclosure are substantial. Indeed, such designation weighs heavily in favor of redaction because it evidences a recognized privacy interest that, by definition, is not merely speculative.

As to the information pertaining to records and discussion pertaining to Cruden, the information sought to be protected constitutes corporate and company records (and discussions regarding such records) of both the Trust and Cruden, its trustee. Such information is likewise expressly recognized as “confidential information” in NRS 164.041. *See* NRS 164.041(4)(d). The information sought to be protected includes internal discussions on matters of common interest, including discussions arising from advice of counsel, regarding the internal operations of Cruden, the Trust and assets of the Trust. Again, the express designation by the Legislature that such records constitute “confidential information” weighs heavily in favor of redaction as it evidences a recognized privacy interest that is not merely speculative.

As to both categories of information, the public’s interest in open court records is satisfied by access to the docket, the filings, judicial rulings without disclosing the trust instruments.

1 Based on the foregoing, LKM requests that the Motion to Seal and Joinder be granted, that  
2 the portions of the record identified in the Motion and Joinder indices be redacted and documents be filed  
3 under seal, and that such information remain confidential and protected from public examination in the  
4 court record pending disposition of this request.

5 **AFFIRMATION**

6 **Pursuant to NRS 239B.030**

7 The undersigned does hereby affirm that the preceding document does not contain the personal  
8 information of any person.  
9

10 Dated this 19th day of February, 2026.

11 SOLOMON DWIGGINS FREER & STEADMAN, LTD.

12  
13 By: /s/ Alan D. Freer

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19 *Attorneys for Lachlan K. Murdoch*  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of Solomon Dwiggins Freer & Steadman, Ltd., and in such capacity and on the date indicated below, I caused to be served a true and correct copy of the **MOTION TO MAINTAIN UNDER SEAL OR REDACT PORTIONS OF PLEADINGS, PAPERS, AND OTHER RECORDS**, by the method indicated below:

Via: ☐ Hand Delivery

☒ U.S. Mail: by placing the document(s) listed above in a sealed envelope with postage fully prepaid thereon, in the United States mail at Las Vegas, Nevada, as forth below:

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☐ Certified Mail, Return Receipt Request

☒ Electronic Submission: submitted to the above-entitled Court for electronic filing

and service upon the Court's Service List for the above-referenced case.

DATED this 19<sup>th</sup> day of February, 2026.

/s/ Sherry J. Curtin -Keast

An employee of SOLOMON DWIGGINS FREER & STEADMAN, LTD.