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CASE NO: A-26-957159-C
Department 27

Attorneys for Google LLC

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

IN THE MATTER OF THE REVERSE
KEYWORD SEARCH WARRANT
DIRECTED TO GOOGLE LLC,

Movant.

Case No.:

Dept.:

Event No. LLV260700003342

GOOGLE LLC'S MOTION TO SEAL

GOOGLE LLC'S MOTION TO SEAL

Movant and non-party Google LLC ("Google"), by and through its undersigned counsel, hereby moves this Court for an order placing under seal its Motion to Quash Search Warrant and supporting materials for a 180-day period pursuant to Eighth Judicial District Court Rule (EDCR) 8.09 and the Nevada Rules for Sealing and Redacting Court Records (SRCR).

I. Relief Requested

Google moves the Court for an order sealing Google's Motion to Quash Search Warrant, the Declaration of Alfredo Alan Garza in Support of Google's Motion to Quash ("Garza Declaration"), and Exhibits A-E to the Garza Declaration filed on September 18, 2025 for a 180-day period pursuant to Nevada Rule SRCR 3 and Local Rule EDCR 8.09.

II. Background

Google received a reverse keyword search warrant (the “Warrant”) obtained by the Las Vegas Metropolitan Police Department (“LVMPD”). *See* Garza Decl., Ex. E. Attached to the Warrant is the sealed affidavit and a Court Order prohibiting Google from disclosing the Warrant’s existence for a 90-day period. *See id.* Google has previously received other reverse keyword warrants served by the LVMPD or the Henderson Police Department, all of which contain similar non-disclosure orders¹ or sealed affidavits. *See* Garza Declaration, Exs. A–D.

Google is moving to quash the Warrant because it operates as an illegal general warrant and violates Federal and State constitutional provisions, and because it violates the Stored Communications Act, 18 U.S.C. § 2702, by requiring Google to disclose customer information and content in response to a facially invalid warrant. As the Motion to Quash, Garza Declaration, and its supporting Exhibits A through E quote directly from, reference, or attach sealed search warrant affidavits, public disclosure of these filings would violate the operative non-disclosure order and compromise sealed judicial records.

III. Argument

A. The Motion to Quash and supporting documents should be temporarily sealed.

Generally, court records are presumptively open to the public. *See* SRCR 1(3); *Jones v. Nev. Comm’n on Jud. Discipline*, 318 P.3d 1078, 1085 (2014). However, this Court may order filings sealed upon written findings that a compelling privacy or safety interest outweighs the public interest in open records. *See* SRCR 3(4). SRCR 3(4) identifies circumstances where sealing is justified, including where disclosure is restricted by law or poses risks to public safety.

¹ The non-disclosure orders from the previous warrants have since expired, however, Google moves to seal the warrants out of an abundance of caution and because the affidavits attached to the warrants are still sealed. *See* Garza Decl., Exs. A-D.

1 SRCR 3(4)(a) authorizes sealing when public access is restricted by law. Google is
2 subject to binding non-disclosure orders issued pursuant to 18 U.S.C. § 2705(b) and Nevada law,
3 prohibiting Google from disclosing the Warrant, its contents, or the surrounding investigation.
4 *See, e.g.*, Garza Declaration, Exhibit E at 18. The affidavits in support of the other search
5 warrants attached as exhibits are also sealed. *See* Garza Declaration, Exs. A–D. Sealing the
6 Motion to Quash, Garza Declaration, and supporting exhibits is required to ensure compliance
7 with these non-disclosure mandates and avoid disclosure of sealed materials.
8

9 SRCR 3(4)(c) permits sealing to effectuate judicial orders designed to protect public
10 safety. As described above, the sealing is required to comply with non-disclosure orders, which
11 preserve the integrity of active law enforcement investigations.
12

13 Finally, when issuing sealing orders, courts must use “the least restrictive means and
14 duration.” SRCR 3(6). Accordingly, sealing orders should not be indefinite. *See id.*

15 **IV. Conclusion**

16 For the reasons set forth above, Google respectfully requests the Court to order the Clerk
17 to file under seal Google’s Motion to Quash, the Garza Declaration, and Exhibits A–E attached
18 to the Garza Declaration for a 180-day period. A proposed form of order is submitted with the
19 Judge’s copy of this motion.

20 Dated: September 18, 2026

Respectfully Submitted,

22 KING SCOW KOCH DURHAM LLC

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Executed on September 18, 2026, at Henderson, Nevada.

KING SCOW KOCH DURHAM LLC