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8 *Attorneys for The State of Nevada,
9 Department of Motor Vehicles, a
Governmental entity*

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2006 APR 10 PM 3:57
WILLIAM SCOTT JENKINS
BY C. COOPER
CLERK

11 **IN THE FIRST JUDICIAL DISTRICT COURT OF**
12 **THE STATE OF NEVADA IN AND FOR CARSON CITY**

13 AMERICAN CIVIL LIBERTIES UNION
OF NEVADA,

14 Petitioner,

15 vs.

16 THE STATE OF NEVADA,
17 DEPARTMENT OF MOTOR VEHICLES,
a government entity,

18 Respondent.

Case No. 25 EW00026 1B

Dept. No. 2

20 **RESPONDENT'S OPPOSITION TO PETITIONER ACLU OF NEVADA'S**
21 **MOTION TO COMPEL PRODUCTION AND ORAL TESTIMONY**

22 Respondent, The State of Nevada, Department of Motor Vehicles ("DMV"), by and
23 through its undersigned counsel, hereby submits this Opposition to Petitioner ACLU of
24 Nevada's ("ACLU") Motion to Compel Production and Oral Testimony ("Motion").

25 **INTRODUCTION**

26 The ACLU's Motion seeks an order on two points: (1) compelling the production of
27 "additional documents identified by the DMV as responsive to [the ACLU's] public records
28 requests," or requiring the DMV to "otherwise provide a basis for the withholding of each

1 document as provided by NRS 239.0107(1)(d)”; and (2) granting the ACLU’s “request to
2 take oral testimony of DMV representatives with information pertaining to this matter.”
3 Mot. at 1–2.

4 The Motion should be denied because (1) the ACLU’s meet-and-confer efforts prior
5 to filing their Motion were deficient; (2) once proper meet-and-confer efforts were engaged
6 in by the parties, the DMV produced the confidentiality log to the ACLU, rendering its first
7 request moot; and (3) the request for oral testimony is not ripe for consideration in a motion
8 to compel.

9 **FACTUAL AND PROCEDURAL HISTORY**

10 On August 15, 2025, the ACLU filed a Petition for Writ of Mandamus Pursuant to
11 NRS 239.001 (“Petition”), in which it claimed that the DMV had failed to fully respond to
12 various public records requests made by the ACLU. *See generally* Compl. On October 17,
13 2025, the DMV filed its Opposition to the ACLU’s Petition. On October 24, 2025, the ACLU
14 filed a Reply in support of its Petition.

15 The Court held a hearing on the Petition on February 6, 2026, at which it ordered
16 the DMV to provide, within seven days, additional information via sworn declarations of
17 DMV personnel, as well as unredacted versions of the documents provided to the ACLU in
18 response to its public records requests for the Court’s *in camera* review and a redaction log.

19 On February 13, 2026, the DMV filed a Supplement to its Opposition, in which it
20 provided the information requested by the Court. The Supplement also informed the Court
21 that the DMV had withheld a number of documents on confidentiality grounds and was in
22 the process of reviewing and logging the documents. The DMV committed to further
23 supplementing its Opposition with those documents and a confidentiality log explaining
24 the reasons for their withholding. *See* 2/13/26 Supplement at Ex. 5, ¶¶ 23–24.

25 On February 27, 2026, the DMV filed its Second Supplement to its Opposition, which
26 provided the Court, for *in camera* review, 103 documents withheld on confidentiality
27 grounds, and a log explaining the bases for withholding the documents. This filing was
28 accompanied by a motion to seal the documents and the log from public access. On March

1 3, 2026, the DMV filed a Notice with the Court advising it that seven documents of the
2 previously withheld set of 110 documents had been deemed, on further review, not to be
3 confidential and were produced to the ACLU.

4 On March 3, 2026, counsel for the ACLU contacted counsel for the DMV and
5 requested that the DMV “provide the log identifying any withheld documents and the basis
6 for their non-production as referenced in ¶ 24 of Ms. Whelan’s declaration [Supplement,
7 Ex. 5].” Email from S. Ramic, 3/3/2026 (attached as Ex. 1). That same day, counsel for the
8 DMV responded and took the position that “disclosure of the log risks revealing certain of
9 the confidential information that [the DMV has] withheld.” *Id.* Counsel for the DMV then
10 invited counsel for the ACLU to oppose the motion to seal the log, to the extent counsel
11 disagreed. *Id.* Counsel for the ACLU responded on March 5, 2026, via email, with an
12 explanation of the ACLU’s legal position on the requirement of a log. *Id.* Counsel did not
13 offer or request a meet-and-confer phone call. Nor did the ACLU file an opposition to the
14 DMV’s motion to seal.

15 On March 18, 2026, counsel for the ACLU sent a follow-up email stating: “In addition
16 to our request for the undisclosed documents, we think it is appropriate that DMV
17 representatives provide in court testimony regarding how the public records requests were
18 handled. Do you intend to oppose this request?” Email from S. Ramic, 3/18/2026 (attached
19 as Ex. 2). Counsel then offered to “hop on a call” the following day if “it would be helpful.”
20 *Id.* Both Attorney Whelan and Attorney Pace were out of office the week of March 16, with
21 Attorney Pace returning on March 23 and Attorney Whelan returning on March 24. *See*
22 Whelan Decl. (attached as Ex. 3) ¶ 8. The ACLU should have been informed that both
23 attorneys were out of the office because Attorney Whelan and Attorney Pace both set
24 automatic replies to that effect. *Id.*

25 On March 23, 2026, the ACLU filed its Motion. On March 24, 2026, the ACLU
26 provided a courtesy copy of the filed Motion via e-mail to counsel for the DMV. Email from
27 S. Lara (attached as Ex. 4) .

28 ///

1 On March 27, Attorney Whelan emailed counsel for the ACLU and requested a
2 telephonic meet and confer to discuss the issues identified in the ACLU's Motion to Compel.
3 Email from J. Whelan (attached as Ex. 5). As a result, on April 1, counsel for the ACLU
4 and the DMV held a Zoom meet and confer. The parties agreed that the DMV would provide
5 a redacted version of the privilege log that the DMV had previously provided to the Court.
6 Counsel for the DMV stated its position that a Motion to Compel was not the proper vehicle
7 to raise a request for live testimony, and the ACLU indicated that it wanted to maintain
8 its Motion to Compel. Ex. 3 at ¶ 13.

9 Counsel for the DMV provided the ACLU with a redacted copy of the privilege log on
10 April 3, and the parties discussed the contents and redactions via email. Emails between
11 S. Ramic and A. Pace (attached as Ex. 6).

12 ARGUMENT

13 I. The ACLU's Meet-and-Confer Efforts Did Not Satisfy FJDCR 3.7.

14 FJDCR 3.7 requires that, “[b]efore filing any motion, . . . the party must confer with
15 the opposing attorneys . . . and make a good faith effort . . . to resolve the issues raised in
16 the motion.” As the federal courts of this state have noted with respect to their similar
17 meet-and-confer requirement, “The meet and confer requirement is not an idle obligation.
18 It is first intended to require the parties to address and perhaps resolve their discovery
19 dispute. Even if the discovery dispute cannot be resolved, it might narrow the scope of
20 discovery issues the court might decide.” *Furnare v. Dzurenda*, No. 3:18-cv-00014-RCJ-
21 WGC, 2019 WL 13335644 at *2 (D. Nev. Dec. 17, 2019).

22 Here, the three e-mails sent by counsel for the ACLU do not constitute a “good faith
23 effort” to resolve the issues of production of the confidentiality log and the ACLU's request
24 for oral examination of DMV personnel. This is so for multiple reasons.

25 First, while the First Judicial District Court Rules do not clearly specify *how* parties
26 should confer before filing a motion, most courts require some level of direct personal
27 communication (e.g., in person, videoconference, or telephone) rather than a written
28 exchange of emails. *See, e.g., Barnes v. Kijakazi*, No. 3:18-cv-00199-MMD-CSD, 2022 WL

1 22329483 at *1 (D. Nev. Jul. 11, 2022) (e-mail is “insufficient to satisfy the court’s meet and
2 confer requirements.”); *In re Marriage of Moore*, 102 Cal. App. 5th 1275, 1293, 322 Cal.
3 Rptr. 3d 249, 265 (2024) (“A reasonable and good faith attempt at informal resolution
4 entails something more than bickering Rather, the law requires that counsel attempt to
5 talk the matter over, compare their views, consult, and deliberate.”) (internal quotations
6 omitted).

7
8 Second, when counsel for the ACLU e-mailed on March 18, 2026, during the local
9 school district’s spring break, and received out-of-office replies from counsel for the DMV,
10 it would have been reasonable and in good faith to follow up by telephone, additional e-
11 mail, or by contacting counsel’s assistant, identified in counsels’ out-of-office replies.
12 Instead, the ACLU rushed to file its Motion.

13 Notably, once counsel for the DMV returned to the office and contacted counsel for
14 the ACLU by telephone, the parties were able to work out a solution by which the DMV
15 provided a copy of the confidentiality log with sensitive information redacted. Had the
16 ACLU engaged in full, good-faith efforts to meet and confer, motion practice could have
17 been avoided. *See generally* Ex. 3.

18 **II. The ACLU’s Request for an Order Compelling Production of the Log Is Moot**

19 When the information sought by a motion to compel is provided prior to the
20 resolution by the court of the motion to compel, the motion may be denied as moot. *See*
21 *Helfrich v. Neven*, No. 2:14-cv-01725-RFB-NJK, 2015 WL 14106705 at *1 (D. Nev. Aug. 6,
22 2015) (denying motion to compel as moot where party provided answer to information
23 sought by motion). Here, following additional meet-and-confer efforts following the ACLU’s
24 premature filing of its Motion, the DMV provided counsel for the ACLU with a copy of the
25 log explaining the bases for withholding 103 documents from the DMV’s response to the
26 ACLU’s public records request. The DMV redacted minimal sensitive information from the
27 log, including the names and personal identifying information of the subjects of criminal
28 investigations and the names of law enforcement officers from federal agencies, and it

1 clarified its reasons via email to counsel to the ACLU. Accordingly, the ACLU's request for
2 an order compelling production of the log is now moot, and the Court may deny that portion
3 of the Motion on mootness grounds.

4 **III. The ACLU's Request for an Order Compelling Oral Testimony is Improper**

5 "A motion to compel discovery is an enforcement mechanism used when someone
6 fails to comply with a discovery request." *Okada v. Eighth Judicial Dist. Ct.*, 134 Nev. 6,
7 12, 408 P.3d 566, 571 (2018) (citing NRCP 37). "It is clear from the language in NRCP 37(a)
8 that a motion to compel discovery is not a separate, independent 'request' for information
9 but rather is an application to the court for an order compelling cooperation with a
10 preexisting 'request.'" *Id.*

11 Here, the ACLU's request for production of documents is redundant with its
12 underlying petition for a writ of mandamus. Styling this request as a Motion to Compel,
13 which is designed to address issues in the discovery process, is improper. *See, e.g., Okada*,
14 134 Nev. at 12, 408 P.3d at 571 (rejecting the notion that a motion to compel can be used
15 as "a request ... to obtain any information or data") (citations and quotations omitted). The
16 ACLU has not served any discovery requests in this case, nor has it served a deposition
17 notice, or filed any request for evidentiary hearing with the Court. During the parties meet-
18 and-confer discussions post-filing of the Motion, counsel for the DMV alerted counsel for
19 the ACLU to this fact and suggested the ACLU file a request for hearing. Counsel for the
20 ACLU preferred to proceed with the Motion. Because a request for discovery cannot be
21 made for the first time in a motion to compel, *see supra, Okada*, the DMV has not violated
22 any discovery obligation, and the Court cannot issue an order compelling such testimony.
23 The Motion must be denied with respect to the request for oral testimony.

24 **CONCLUSION**

25 The ACLU failed to meet and confer in good faith prior to the filing of this Motion.
26 Had it done so, the parties could have likely worked out a resolution without court
27 intervention. After engaging in good-faith conferral, the parties resolved the issue of
28 production of the confidentiality log, rendering that request moot. The Court must deny

1 the request for oral testimony, as no request had been made to the Court or the DMV that
2 the DMV failed to comply with. Enforcement through an order compelling testimony would
3 therefore be improper.

4 **AFFIRMATION**
5 **(Pursuant to NRS 239B.030)**

6 The undersigned does hereby affirm that the foregoing document does not contain
7 the social security number of any person.

8 Dated: April 10, 2026.

9 AARON D. FORD
10 Attorney General

11 By: *Anna C. Cook For* (Bar No. #7312)
12 Jessica E. Whelan (Bar No. 14781)
13 Chief Deputy Solicitor General – Litigation
14 Abigail L. Pace (Bar No. 15976)
15 Deputy Attorney General
16 State of Nevada
17 Office of the Attorney General
18 1 State of Nevada Way, Suite 100
19 Las Vegas, NV 89119
20 jwhelan@ag.nv.gov
21 apace@ag.nv.gov


22 *Attorneys for The State of Nevada,*
23 *Department of Motor Vehicles, a*
24 *Governmental entity*

1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of the Office of the Attorney General, State of Nevada,
3 and that on April 10, 2026, I deposited for mailing in the United States Mail, first-class
4 postage prepaid, at Carson City, a true and correct copy of the foregoing document,
5 addressed to the following:

6 Sadmira Ramic, Esq.
7 Christopher M. Peterson, Esq.
8 American Civil Liberties Union of Nevada
4362 W. Cheyenne Ave.
North Las Vegas, NV 89032

9 *Attorneys for American Civil Liberties*
10 *Union of Nevada*

11 

12 _____
13 AG Legal Secretary, an employee of the
14 Office of the Nevada Attorney General

EXHIBIT 1

From: [Sadmira Ramic](#)
To: [Jessica E. Whelan](#); [Jeny M. Beesley](#); [Chris Peterson](#)
Cc: [Abigail L. Pace](#)
Subject: RE: ACLUNV v. DMV Re: Additional Documents
Date: Wednesday, March 18, 2026 2:56:18 PM
Attachments: [image001.jpg](#)

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good afternoon,

I am following up on the email below.

In addition to our request for the undisclosed documents, we think it is appropriate that DMV representatives provide in court testimony regarding how the public records requests were handled. Do you intend to oppose this request?

I am available to hop on a call tomorrow if you think it would be helpful.

Thanks,
Sadmira

From: Sadmira Ramic
Sent: Thursday, March 5, 2026 9:45 AM
To: Jessica E. Whelan <JWhelan@ag.nv.gov>; Jeny M. Beesley <JBeesley@ag.nv.gov>; Chris Peterson <peterson@aclunv.org>
Cc: Abigail L. Pace <APace@ag.nv.gov>
Subject: RE: ACLUNV v. DMV Re: Additional Documents

Good morning,

Under the NPRA, if all or any part of this request is denied, Nevada law requires that the DMV provide a written statement of the grounds for the denial, citing to the Nevada law or regulations under which it believes it may deny access for *each* document. NRS 239.0107 (1)(d) (emphasis added). Furthermore, a governmental entity that has legal custody or control of a public book or record shall not deny a request on the basis that the requested public book or record contains information that is confidential if the governmental entity can redact, delete, conceal or separate the confidential information from the information included in the public book or record that is not otherwise confidential. NRS 239.010(3).

This information is typically conveyed through a privilege log, especially when, as here, there are large number of records being withheld. Simply stating that they are being withheld because of confidentiality is not enough, and failure to follow the process outlined in the NPRA is a violation of the NPRA.

The Court ordered that a privilege log be provided for the records that were produced but redacted. I don't see why the same would not be applicable to the 103 documents that were never disclosed. Without the privilege log, there is no way for us to determine whether the DMV's assertions that the records are confidential are accurate.

As such, at minimum, the DMV must follow the process in the NPRA; identify each document being withheld and cite to applicable Nevada law that justifies its withholding of the documents, and if any of the documents can be produced in redacted form, it must do so.

Thanks,
Sadmira

From: Jessica E. Whelan <JWhelan@ag.nv.gov>
Sent: Tuesday, March 3, 2026 4:36 PM
To: Sadmira Ramic <ramic@aclunv.org>; Jeny M. Beesley <JBeesley@ag.nv.gov>; Chris Peterson <cpeterson@aclunv.org>
Cc: Abigail L. Pace <APace@ag.nv.gov>
Subject: RE: ACLUNV v. DMV Re: Additional Documents

Hi Sadmira,

Paragraph 24 of my declaration clearly states that we intended to provide the Court with the log; our position, which is state in our motion to seal, is that disclosure of the log risks revealing certain of the confidential information that we have withheld. There also is no obligation under the NPRA to produce a log of documents withheld on the basis of confidentiality. To the extent you disagree, you may oppose our motion to seal and let the Court decide. But we cannot agree to release the log at this time.

Thank you,
Jessica

From: Sadmira Ramic <ramic@aclunv.org>
Sent: Tuesday, March 3, 2026 3:39 PM
To: Jeny M. Beesley <JBeesley@ag.nv.gov>; Chris Peterson <cpeterson@aclunv.org>
Cc: Jessica E. Whelan <JWhelan@ag.nv.gov>; Abigail L. Pace <APace@ag.nv.gov>
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Can you please provide the log identifying any withheld documents and the basis for their non-production as referenced in ¶ 24 of Ms. Whelan's declaration?

Thank you,

From: Jeny M. Beesley <jbeesley@ag.nv.gov>

Sent: Tuesday, March 3, 2026 3:22 PM

To: Sadmira Ramic <ramic@aclunv.org>; Chris Peterson <cpeterson@aclunv.org>

Cc: Jessica E. Whelan <jwhelan@ag.nv.gov>; Jeny M. Beesley <jbeesley@ag.nv.gov>; Abigail L. Pace <APace@ag.nv.gov>

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Good afternoon,

Attached please find State Defendants' Notice of Supplemental Records Production to the ACLU. Please note that this has also been mailed to your office.

Thank you.

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Kyle J. Hoyt, Senior Deputy Attorney General
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From: Sadmira Ramic <ramic@aclunv.org>
Sent: Monday, March 2, 2026 9:17 AM
To: Jessica E. Whelan <jwhelan@ag.nv.gov>; Abigail L. Pace <APace@ag.nv.gov>
Cc: Chris Peterson <cpeterson@aclunv.org>
Subject: ACLUNV v. DMV Re: Additional Documents

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Hope you all had a good weekend.

Do you know when the DMV will produce the additional documents that were identified in Ms. Whelan's declaration? The declaration stated that the documents would be produced by February 20, 2026, but to my knowledge nothing was filed with the Court for in camera review nor did we receive any documents directly.

Thank you,

Sadmira Ramic, Esq. (*she/her*)
Senior Staff Attorney
ACLU of Nevada
Phone: 775-828-2210
Address: 4362 W. Cheyenne Ave|North Las Vegas, Nevada 89032

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Senior Staff Attorney

ACLU of Nevada

Phone: 775-828-2210

Address: 4362 W. Cheyenne Ave|North Las Vegas, Nevada 89032

EXHIBIT “3”

1 AARON D. FORD
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8
9 *Attorneys for The State of Nevada,
Department of Motor Vehicles, a
Governmental entity*

10
11 **IN THE FIRST JUDICIAL DISTRICT COURT OF**
12 **THE STATE OF NEVADA IN AND FOR CARSON CITY**

13 AMERICAN CIVIL LIBERTIES UNION
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14 Petitioner,

15 vs.

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a government entity,

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Case No. 25 EW00026 1B

Dept. No. 2

19
20 **DECLARATION OF JESSICA E. WHELAN IN SUPPORT OF STATE**
21 **DEFENDANT'S OPPOSITION TO THE ACLU'S MOTION TO COMPEL**

22 I, Jessica E. Whelan, declare as follows:

23 1. I am the Chief Deputy Solicitor General—Litigation in the Nevada Attorney
24 General's Office, and I make this declaration in support of State Defendant's Opposition to
25 the ACLU's Motion to Compel. All facts stated herein are based on my personal knowledge
26 unless otherwise stated.

27 2. On February 27, 2026, the DMV provided the Court with 103 previously
28 unproduced documents for *in camera* review. The DMV also provided a log, identifying the

1 basis for withholding each document. Due to the sensitive nature of these documents,
2 including the identifying information provided in the log, the DMV filed a contemporaneous
3 Motion to Seal the documents.

4 3. After these documents and Motion were filed, the ACLU requested that the
5 DMV provide these documents and the log directly to the ACLU.

6 4. I responded to counsel for the ACLU and explained that the documents and
7 the log were protected from disclosure. But I mentioned that if the ACLU disagreed with
8 our position, they could notify the Court by opposing the Motion to Seal. A true and correct
9 copy of this email is attached at Ex. 1.

10 5. Counsel for the ACLU did not file an opposition to the Motion to Seal.

11 6. Counsel for the ACLU did not request to meet and confer on this matter.

12 7. On March 18, counsel for the ACLU emailed counsel for the DMV and
13 requested that the DMV provide documents for in-camera review directly to the ACLU. A
14 true and correct copy of this email is attached to this Opposition at Ex. 2.

15 8. At this time, both attorneys on my team, myself and Abigail Pace, were out of
16 the office on annual leave. I set my Outlook inbox to send automatic replies during this
17 time, and upon information and belief, so did Attorney Pace. These automatic replies
18 indicated the days we would be out of the office, stated the date of our return, and invited
19 any urgent requests to be forwarded to the department assistant.

20 9. As a result, counsel for the ACLU was on notice that I was out of the office
21 with only intermittent access to email until March 24.

22 10. Upon information and belief, counsel for the ACLU did not reach out to my
23 assistant or otherwise attempt to follow up on this request.

24 11. Before I returned to the office, the ACLU filed the instant Motion to Compel
25 on March 23, 2026.

26 12. Following the filing of the ACLU's Motion, I reached out to counsel and
27 requested a telephonic meet and confer to attempt to resolve the discovery issues they
28 raised. A true and correct copy of this email is attached at Ex. 5.

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13. Counsel for both parties met via Zoom on April 1 and had a productive conversation: Notably, the DMV agreed to provide a redacted version of the privilege log previously provided to the Court. I requested that the ACLU withdraw its Motion to Compel because it was procedurally improper. Counsel for the ACLU opted to maintain its motion despite this request and our agreement to produce the privilege log in redacted form.

AFFIRMATION
(Pursuant to NRS 239B.030)

The undersigned does hereby affirm that the foregoing document does not contain the social security number of any person.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 10, 2026.

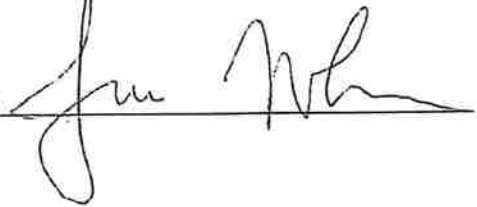
By: 

EXHIBIT “4”

From: [Suzanne Lara](#)
To: [Jessica F. Whelan](#); [Abigail L. Pace](#)
Cc: [Sadmira Ramic](#)
Subject: Filed Motion to Compel (ACLUNV v. DMV)
Date: Tuesday, March 24, 2026 3:46:42 PM
Attachments: [260324 Motion to Compel Proposed Order \(1\).pdf](#)
[Proposed Order Final.pdf](#)

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Good afternoon,

Please see the attached motion to compel and proposed order filed with the court in *American Civil Liberties Union of Nevada v. State of Nevada Department of Motor Vehicles*, Case No. 25 EW00026 1B.

Thank you,

Suzanne Lara

Pronouns: she/her/hers

Legal Department Coordinator, ACLU of Nevada

4362 W Cheyenne Ave | N Las Vegas, NV 89032

725.210.6328

www.aclunv.org | [Facebook](#) | [Twitter](#)

EXHIBIT “5”

From: [Sadmira Ramic](#)
To: [Jeny M. Beesley](#); [Jessica E. Whelan](#); [Chris Peterson](#)
Cc: [Abigail L. Pace](#); [Jeny M. Beesley](#)
Subject: Re: ACLU v. DMV - motion to compel
Date: Tuesday, March 31, 2026 8:25:27 AM
Attachments: [image002.jpg](#)
[image003.png](#)

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Good morning,

Received. Thank you.

For some reason my zoom was not linking with my outlook.

Get [Outlook for iOS](#)

From: Jeny M. Beesley <JBeesley@ag.nv.gov>
Sent: Tuesday, March 31, 2026 7:56:14 AM
To: [Sadmira Ramic <ramic@aclunv.org>](mailto:ramic@aclunv.org); [Jessica E. Whelan <JWhelan@ag.nv.gov>](mailto:JWhelan@ag.nv.gov); [Chris Peterson <cpeterson@aclunv.org>](mailto:cpeterson@aclunv.org)
Cc: [Abigail L. Pace <APace@ag.nv.gov>](mailto:APace@ag.nv.gov); [Jeny M. Beesley <JBeesley@ag.nv.gov>](mailto:JBeesley@ag.nv.gov)
Subject: RE: ACLU v. DMV - motion to compel

Good morning Ms. Ramic,

I sent a Teams link as I did not see the link on Jessica or Abby's calendars. Please confirm you received it. Thank you.

Jeny M. Beesley
AG Legal Secretary to
Jessica E. Whelan, Chief Deputy Solicitor General – Litigation
Kyle J. Hoyt, Senior Deputy Attorney General
Abigail L. Pace, Senior Deputy Attorney General
Complex Litigation Division
Office of the Attorney General
1 State of Nevada Way, Suite 100
Las Vegas, Nevada 89119
Phone: 702-486-3216
jbeesley@ag.nv.gov

aglogo[1]

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From: Sadmira Ramic <ramic@aclunv.org>
Sent: Monday, March 30, 2026 4:14 PM
To: Jessica E. Whelan <JWhelan@ag.nv.gov>; Chris Peterson <peterson@aclunv.org>
Cc: Abigail L. Pace <APace@ag.nv.gov>; Jeny M. Beesley <JBeesley@ag.nv.gov>
Subject: Re: ACLU v. DMV - motion to compel

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Sent.

Please let me know if you didn't get it. My zoom is not connecting to my outlook.

From: Jessica E. Whelan <JWhelan@ag.nv.gov>
Sent: Monday, March 30, 2026 4:01 PM
To: Sadmira Ramic <ramic@aclunv.org>; Chris Peterson <peterson@aclunv.org>
Cc: Abigail L. Pace <APace@ag.nv.gov>; Jeny M. Beesley <JBeesley@ag.nv.gov>
Subject: RE: ACLU v. DMV - motion to compel

That would be great. Thanks!

From: Sadmira Ramic <ramic@aclunv.org>
Sent: Monday, March 30, 2026 2:08 PM
To: Jessica E. Whelan <JWhelan@ag.nv.gov>; Chris Peterson <peterston@aclunv.org>
Cc: Abigail L. Pace <APace@ag.nv.gov>; Jeny M. Beesley <JBeesley@ag.nv.gov>
Subject: Re: ACLU v. DMV - motion to compel

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That works for me. Do you need me to send a zoom invite?

From: Jessica E. Whelan <JWhelan@ag.nv.gov>
Sent: Monday, March 30, 2026 11:52 AM
To: Sadmira Ramic <ramic@aclunv.org>; Chris Peterson <peterston@aclunv.org>
Cc: Abigail L. Pace <APace@ag.nv.gov>; Jeny M. Beesley <JBeesley@ag.nv.gov>
Subject: RE: ACLU v. DMV - motion to compel

How about Wednesday at 1pm?

From: Sadmira Ramic <ramic@aclunv.org>
Sent: Friday, March 27, 2026 4:29 PM
To: Jessica E. Whelan <JWhelan@ag.nv.gov>; Chris Peterson <peterston@aclunv.org>
Cc: Abigail L. Pace <APace@ag.nv.gov>; Jeny M. Beesley <JBeesley@ag.nv.gov>
Subject: Re: ACLU v. DMV - motion to compel

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Hi Jessica,

I can meet Wednesday at any time except 11-12:30 and Thursday any time except 9-11:30.

Get [Outlook for iOS](#)

From: Jessica E. Whelan <JWhelan@ag.nv.gov>
Sent: Friday, March 27, 2026 4:02 PM
To: Sadmira Ramic <ramic@aclunv.org>; Chris Peterson <peterston@aclunv.org>
Cc: Abigail L. Pace <APace@ag.nv.gov>; Jeny M. Beesley <JBeesley@ag.nv.gov>
Subject: ACLU v. DMV - motion to compel

This Message Is From an External Sender

This message came from outside your organization. Sadmira and Chris,

I wanted to reach out regarding the ACLU's motion to compel in the DMV matter to see if we could come to a resolution without court involvement. I know we had prior email communication on the issue of the log, but I had hoped that, before any motion practice, we could have had a proper meet and confer by phone or video. Also, I apologize for the lack of response to your email last week; both Abby and I were out of the office for spring break travel.

I think we can likely come to some resolution on disclosure of the log. I think given the Court's setting of a hearing for April, it would be best if we could resolve the log issue so that you have a sense of what the documents we filed for *in camera* review are.

Are you available for a phone call early next week to discuss? If so, please let me know your availability.

Thank you,
Jessica

Jessica E. Whelan

Chief Deputy Solicitor General - Litigation

Office of the Attorney General

1 State of Nevada Way

Suite 100

Las Vegas, Nevada 89119

jwhelan@ag.nv.gov

D: 702-486-4346



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EXHIBIT “6”

3 2 1 1

From: [Abigail L. Pace](#)
To: [Sadmira Ramic <ramic@aclunv.org>](#)
Cc: [Jessica E. Whelan](#); [Jeny M. Beesley](#)
Subject: ACLU v. DMV - Privilege Log (produced in redacted form)
Date: Friday, April 3, 2026 2:39:50 PM
Attachments: [2026.04.03 - Privilege Log - Redacted - ACLU v. DMV.xlsx](#)
[Outlook-ibz5vzfx.png](#)

Hi Sadmira,

As we discussed at our Wednesday meet-and-confer, attached please find a redacted version of the Privilege Log previously submitted under seal to the Court.

These redactions fall into two categories: redaction of identifying information of law enforcement personnel (including names of officers and license plate numbers for undercover vehicles) and personally identifying information for DMV subjects. We have left intact information that was previously produced in the DMV's initial production, even if it referenced PII.

If you have any questions about this spreadsheet, please let us know.

Thank you,

Abigail L. Pace, Deputy Attorney General
Complex Litigation Division
Office of the Attorney General
1 State of Nevada Way, Suite 100
Las Vegas, Nevada 89119
APace@ag.nv.gov

