

EXHIBIT AQ

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7 *The Undersigned hereby affirms this document
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9 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
10 **IN AND FOR THE COUNTY OF CARSON CITY**

11 RUTH KOTLER,
12 Petitioner,
13 vs.

14 SILVER STATE CHARTER SCHOOLS,
15 Respondent

CASE NO. 17000006013
DEPT. NO. 1

**APPLICATION FOR ORDER FOR
PUBLIC ENTITY TO PROVIDE PUBLIC
DOCUMENTS AND DECLATORY
JUDGMENT ON PUBLIC RECORD LIST**

16 Petitioner, RUTH KOTLER, (hereinafter "KOTLER") by and through her attorney, Debra
17 M. Amens, Esq. of AMENS LAW, LTD., applies to this Court for an Order compelling the
18 SILVER STATE CHARTER SCHOOLS to provide copies of the public records requested
19 repeatedly from Respondent, SILVER STATE CHARTER SCHOOLS (hereinafter "SSCS").
20 Additionally, Petitioner requests the District Court enter a declaratory judgement related to SSCS
21 being subject to the Nevada Public Records Act, NRS Chapter 239.

22 This Application is made on the grounds that SSCS is a State Public Charter School and
23 thereby subject to the provisions in Chapter 239 of the Nevada Revised Statutes. Additionally,
24 SSCS, through its attorney, F. Thomas Edwards, Esq. of HOLLEY, DRIGGS, WALCH, has
25 denied being a public entity subject to NRS 239.010, and has required Petitioner to enter into a
26 stipulated protective order in regards to evidence she requires in her defense in an appeal for
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1 termination with SSCS. Petitioner believes that the majority of the requested documents qualify
2 as public records and are therefore not protected by the Stipulated Protective Order. Petitioner
3 requests the Court review the list and provide its judgment as to the nature of the documents –
4 public records or not.
5

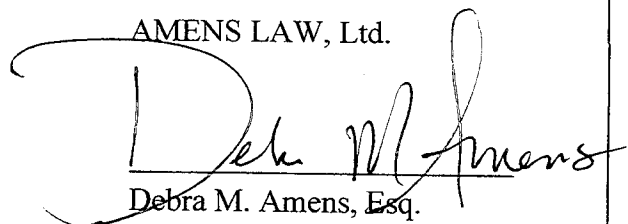
6 Pursuant to NRS 239.011, Petitioner requests Respondent cover her Attorney fees' and
7 costs associated with having to apply to this Court for these documents and this declaratory
8 judgement.
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10 Additionally, Petitioner has requested all Financial Statements and reports or minutes from
11 the Receiver for the months since her suspension: August 2016 to the present. This was requested
12 of SSCS through its attorney in December 2016 and January 2017.

13 In support of this Application, Petitioner provides documentation on her requests,
14 Respondents' denial on August 22, 2016 by SSCS Receiver, the Evident list covered by the
15 Stipulated Protective Order and a copy of the Protective Order for the Court's reference and any
16 oral argument that may be heard on this matter.
17

18 DATED this 24th day of April, 2017.

19 AMENS LAW, Ltd.

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21 Debra M. Amens, Esq.

22 Nevada Bar No. 12681

23 Attorney for Petitioner
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