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IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed  
Oct 13 2014 10:53 a.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

GOLDEN ROAD MOTOR INN, INC., a  
Nevada Corporation d/b/a ATLANTIS  
CASINO RESORT SPA,  
Appellant/Cross-Respondent,  
vs.  
SUMONA ISLAM, an individual,  
Respondent/Cross-Appellant  
and  
MEI-GSR HOLDINGS LLC, a Nevada  
limited liability company d/b/a GRAND  
SIERRA RESORT which claims to be  
the successor in interest to NAV-RENO-  
GS, LLC,  
Respondent.

Case No.: 64349

SUMONA ISLAM, an individual,  
Appellant  
vs.  
GOLDEN ROAD MOTOR INN, INC., a  
Nevada Corporation d/b/a ATLANTIS  
CASINO RESORT SPA,  
Respondent.  
MEI-GSR HOLDINGS LLC d/b/a  
GRAND SIERRA RESORT,  
Appellant/Cross-Respondent,  
vs.  
GOLDEN ROAD MOTOR INN, INC., a  
Nevada Corporation d/b/a ATLANTIS  
CASINO RESORT SPA,  
Respondent/Cross-Appellant.

Case No.: 64452

Case No.: 65497

**SUPPLEMENT TO MOTION TO SEAL**

Appellant/Cross-Respondent Golden Road Motor Inn, Inc. d/b/a Atlantis  
Casino Resort Spa (“Appellant” and/or “Atlantis”), by and through its counsel,  
Robert A. Dotson of Laxalt & Nomura, Ltd., hereby files this supplement to the

1 motion to seal, filed September 2, 2014, as requested by the Court.

2 As directed, this supplement provides a listing of the Volumes and pages of  
3 each Volume which were filed or should have been filed under seal with the  
4 district court and which were treated as sealed by the district court.<sup>1</sup>

5 The Court has correctly identified the fact that not all parts of each Volume  
6 which Appellant has requested be treated as sealed, were sealed or treated as sealed  
7 by the district court. Appellant requested to seal each Volume which contained  
8 any portion which contained any previously sealed information, as its counsel  
9 understood that each Volume needed to be sealed, knowing of no fashion to seal a  
10 portion of each Volume. Pursuant to the Court's Order, the attached Exhibit 1  
11 identifies each page of the record that has been sealed, or was directed to be sealed  
12 by the district court. As this Court has already noted, some Volumes, particularly  
13 Volumes 4<sup>2</sup>, 5<sup>3</sup>, 6<sup>4</sup>, 9<sup>5</sup> and 10<sup>6</sup>, contain relatively few confidential pages. In  
14 contrast, Volumes 12-28 contain the transcript and trial exhibits which were sealed  
15 in their entirety.

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25 <sup>1</sup> This Summary of Sealed Information is attached hereto as Exhibit 1.  
26 <sup>2</sup> 4 App. 0815-0817.  
27 <sup>3</sup> 5 App. 0951-1042.  
28 <sup>4</sup> 6 App. 1235-1260.  
<sup>5</sup> 9 App. 1845-1870 and 1956-1981.  
<sup>6</sup> 10 App. 2055-2080 and 2216-2241.

1 Appellant requests that regardless of the Court's Order, at least the pages  
2 identified in Exhibit 1 be treated as sealed, maintaining the intent of the district  
3 court.<sup>7</sup>

4 Dated this 13 day of October, 2014.

5 LAXALT & NOMURA, LTD.

6 

7 ROBERT A. DOTSON  
8 Nevada State Bar No. 5285  
9 ANGELA M. BADER  
10 Nevada State Bar No. 5574  
11 9600 Gateway Drive  
12 Reno, Nevada 89521  
13 (775) 322-1170  
14 Attorneys for Appellant  
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27 <sup>7</sup> As a matter of completeness, it is identified that in its Order dated 3/3/14 the  
28 district court allowed copies of trial exhibits 83 and 84 to be provided to counsel so  
they could be included in the record on appeal, while maintaining the sealed state  
of those trial exhibits. (Exhibit 2).

**CERTIFICATE OF SERVICE**

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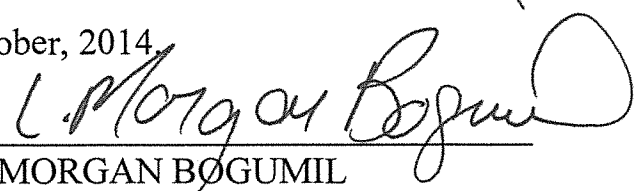
I certify that on this date, I served a copy of the foregoing document upon all counsel of record by:

- Mail on all parties in said action, by placing a true copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth below. At the Law Offices of Laxalt & Nomura, mail placed in that designated area is given the correct amount of postage and is deposited that same date in the ordinary course of business, in a United States mailbox in the City of Reno, County of Washoe, Nevada.
- By electronic service by filing the foregoing with the Clerk of Court using the E-Flex system, which will electronically mail the filing to the following individuals at the email addresses set for the below.
- By email to the email addresses below.

Steven B. Cohen, Esq. Stan Johnson, Esq. Terry Kinnally, Esq. Cohen-Johnson, LLC 255 E. Warm Springs Rd, Ste 100 Las Vegas, NV 89119 <a href="mailto:scohen@cohenjohnson.com">scohen@cohenjohnson.com</a> <a href="mailto:sjohnson@cohenjohnson.com">sjohnson@cohenjohnson.com</a> <a href="mailto:tkinnally@cohenjohnson.com">tkinnally@cohenjohnson.com</a>	Mark Wray, Esq. Law Office of Mark Wray 608 Lander Street Reno, NV 89509 <a href="mailto:mwray@markwraylaw.com">mwray@markwraylaw.com</a>
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Robert L. Eisenberg, Esq.  
Lemons, Grundy & Eisenberg  
6005 Plumas St, 3rd Floor  
Reno, NV 89519  
[rle@lge.net](mailto:rle@lge.net)

Dated this 13 day of October, 2014.

  
\_\_\_\_\_  
L. MORGAN BOGUMIL

# **EXHIBIT 1**

# **EXHIBIT 1**

### Summary of Sealed Information

<u>Volume(s):</u>	<u>Page Number(s):</u>	<u>Description:</u>
4	App. 0815 - App.0817	Exhibit 3 ( <i>Email chain between Shelly Hadley and Christian Ambrose, dated March 28- March 30, 2012 – marked confidential</i> ) to Affidavit of Counsel In Support of Plaintiff's Opposition to Defendants' Motion in Limine, filed June 7, 2013.
5	App. 0951 – App. 1042	Exhibits 1-4 ( <i>Islam's Responses to Plaintiffs First Request for Admissions, Islam's Supplemental Responses to Plaintiffs Second Request For Admissions, Defendant's Responses to Plaintiffs First Set of Request For Admission To Defendant Nav-Reno-GS, LLC dba Grand Sierra Resort, and Master spreadsheet listing guests added to GSR database – all marked confidential</i> ) to Plaintiff's Trial Statement, filed June 26, 2013.
6	App. 1235 – App. 1260	Exhibit 1 ( <i>Transcript of Proceedings- Decision of the Court</i> ) <sup>1</sup> to Plaintiff's Motion For Costs and Attorney's Fees, filed August 21, 2013.

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<sup>1</sup> Plaintiff erroneously filed the Decision of the Court with the District Court as unsealed, however, this was not intended to waive the confidentiality of said transcript.

9	App. 1845 – App. 1870	Exhibit 3 ( <i>Transcript of Proceedings-Decision of the Court</i> ) <sup>2</sup> to Affidavit of Counsel in Support of Plaintiff’s Opposition to GSR’s Motion For Award of Attorney’s Fees and Costs, filed November 4, 2013.
9	App. 1956 – App. 1981	Exhibit 2 ( <i>Transcript of Proceedings-Decision of the Court</i> ) <sup>3</sup> to Plaintiff’s Motion to Stay Enforcement of Judgment and For Injunction Pending Appeal, filed November 4, 2013.
10	App. 2055 – App. 2080	Exhibit 2 ( <i>Transcript of Proceedings-Decision of the Court</i> ) to GSR’s Opposition to Plaintiff’s Motion to Stay Enforcement of Judgment and For Injunction Pending Appeal, filed November 20, 2013.
10	App. 2216 – App. 2241	Exhibit 3 ( <i>Transcript of Proceedings-Decision of the Court</i> ) <sup>4</sup> to Affidavit of Counsel in Support of Plaintiff’s Opposition to GSR’s Renewed Motion For Award of Attorney’s Fees and Costs, filed February 6, 2014.
12-20	App. 2437 – App. 4263	Transcripts of Proceedings – Trial.
21-28	App. 4264 – App. 6052	Trial Exhibits

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<sup>2</sup> Plaintiff erroneously filed the Decision of the Court with the District Court as unsealed, however, this was not intended to waive the confidentiality of said transcript.

<sup>3</sup> Plaintiff erroneously filed the Decision of the Court with the District Court as unsealed, however, this was not intended to waive the confidentiality of said transcript.

<sup>4</sup> Plaintiff erroneously filed the Decision of the Court with the District Court as unsealed, however, this was not intended to waive the confidentiality of said transcript.

**EXHIBIT 2**

**EXHIBIT 2**



1 ROBERT A. DOTSON, ESQ.  
2 Nevada State Bar No. 5285  
3 [rdotson@laxalt-nomura.com](mailto:rdotson@laxalt-nomura.com)  
4 ANGELA M. BADER, ESQ.  
5 Nevada State Bar No. 5574  
6 [abader@laxalt-nomura.com](mailto:abader@laxalt-nomura.com)  
7 LAXALT & NOMURA, LTD.  
8 9600 Gateway Drive  
9 Reno, Nevada 89521  
10 Tel: (775) 322-1170  
11 Fax: (775) 322-1865  
12 Attorneys for Plaintiff

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

10 **IN AND FOR THE COUNTY OF WASHOE**

11 GOLDEN ROAD MOTOR INN, INC., a Nevada  
12 Corporation, d/b/a ATLANTIS CASINO  
13 RESORT SPA

Case No.: CV12-01171

Dept No.: B7

14 Plaintiff,

15 vs.

16 SUMONA ISLAM, an individual; MEI-GSR  
17 HOLDINGS LLC, a Nevada limited liability  
18 company, d/b/a GRAND SIERRA RESORT;  
19 ABC CORPORATIONS; XYZ  
20 PARTNERSHIPS; AND JOHN DOES I through  
21 X, inclusive.

22 Defendants.

23 **ORDER GRANTING PLAINTIFF'S MOTION TO**  
24 **RELEASE COPIES OF SEALED TRIAL EXHIBITS TO COUNSEL**

25 This matter came on for hearing on February 27, 2014 with Angela Bader present for  
26 Atlantis Casino Resort Spa and Mark Wray present for Sumona Islam. Pursuant to SRCR 4(3),  
27 the Court has considered the Plaintiff's Motion filed January 24, 2014, Defendant Sumona  
28 Islam's Opposition filed January 28, 2014, Plaintiff's Reply filed February 4, 2014 and the  
arguments of counsel at the hearing.


1 The Court finds that Defendant Sumona Islam has shown no cause or compelling  
2 circumstances why the Motion should not be granted. It is therefore ordered, judged and decreed  
3 that copies of sealed Trial Exhibits 83 and 84, which were marked and admitted during trial, be  
4 released to only counsel for the parties and that these original Trial Exhibits remain under seal.

5 The Court further orders that copies of these Trial Exhibits released to counsel are not to  
6 be disseminated or used, except for in this case and the ongoing appeals.


7 IT IS SO ORDERED.

8 Dated this 3 day of MARCH, 2014.

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DISTRICT COURT JUDGE

Respectfully submitted,  
LAXALT & NOMURA, LTD

By:   
ROBERT A. DOTSON (NSB # 5285)  
ANGELA M. BADER, ESQ. (NSB #5574)  
9600 Gateway Dr.  
Reno, NV 89521  
Attorneys for Plaintiff