EXHIBIT B

EXHIBIT B

Electronically Filed
02/17/2015 09:25:01 AM

CLERK OF THE COURT

Marquis Aurbach Coffing
Liane K. Wakayama, Esq.
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Attorneys for Eleanor Connell Hartman Ahern, as Trustee and Individually

DISTRICT COURT

CLARK COUNTY, NEVADA

In the Matter of THE W.N. CONNELL AND MARJORIE T. CONNELL LIVING TRUST DATED May 18, 1972, An Inter Vivos Irrevocable Trust.	Case No.: P-09-066425-T Dept. No.: 26

NOTICE OF ENTRY OF ORDER

Please take notice that a Stipulation and Order to File Under Seal was entered in the above-captioned matter on the 13th day of February, 2015, a copy of which is attached hereto.

Dated this 17th day of February, 2015.

MARQUIS AURBACH COFFING

By
Liane K. Wakayama, Esq.
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Candice E. Renka, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **NOTICE OF ENTRY OF ORDER** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 17 day of February, 2015. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:[1]

Whitney B. Warnick, Esq.
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wbw@albrightstoddard.com
bclark@albrightstoddard.com
gma@albrightstoddard.com
Attorney for Kathryn A. Bouvier

Joseph J. Powell, Esq.
The Rushforth Firm, LTD.
probate@rushforthfirm.com
Attorney for Jacqueline M. Montoya

Julia Rodionova, an employee of
Marquis Aurbach Coffing

[1] Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

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Original

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CLERK OF THE COURT

Marquis Aurbach Coffing
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DISTRICT COURT

CLARK COUNTY, NEVADA

In the Matter of THE W.N. CONNELL AND MARJORIE T. CONNELL LIVING TRUST DATED May 18, 1972, An Inter Vivos Irrevocable Trust.	Case No.: P-09-066425-T Dept. No.: 26 Date of Hearing: January 30, 2015 Time of Hearing: 10:00 a.m.

STIPULATION AND ORDER TO FILE UNDER SEAL

This matter, having come before this Court on January 30, 2015, Liane K. Wakayama, Esq, and Candice E. Renka, Esq. of the law firm of Marquis Aurbach Coffing appearing on behalf of Eleanor Connell Hartman Ahern, as Trustee and Individually ("Eleanor"); Whitney B. Warnick, Esq. of the law firm Albright Stoddard, Warnick & Albright appearing on behalf of Kathryn A. Bouvier ("Kathryn"); and Joseph J. Powell, Esq. of the Rushforth Firm, Ltd. appearing on behalf of Jacqueline M. Montoya ("Jacqueline"). The parties hereby STIPULATE as follows:

1. Pursuant to S.C.R. 3.1, "[a]ny person may request that the court seal or redact court records for a case that is subject to these rules by filing a written motion." After a request is properly made, "[t]he court *may* conduct a hearing on a motion to seal." S.C.R. 3.3 (emphasis added). In a civil action, the court may order the court files and records to be sealed, "provided the court makes and enters written findings that the specific sealing or redaction is justified by identified compelling privacy or safety interests that outweigh the public interest in access to the court record." See S.C.R. 3.4.

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2. At a hearing held on January 30, 2015, the parties discussed the option of filing any report prepared concerning the administration and management of the Upton County, Texas oil rights under seal. By stipulation of the parties, the Court granted the request to file under seal should the need arise.

ORDER

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

1. The formal requirements of S.C.R. 3.1 are hereby waived; and

2. Any report prepared concerning the administration and management of the Upton County, Texas oil rights shall be filed under seal.

IT IS SO ORDERED this 11 day of February, 2015.

DISTRICT COURT JUDGE

Submitted by:

MARQUIS AURBACH COFFING

By
Liane K. Wakayama, Esq.,
Nevada Bar No. 11313
Candice E. Renka, Esq.,
Nevada Bar No. 11447
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Eleanor Connell Hartman Ahern, as Trustee and Individually

Approved as to Form and Content By:

Dated this day of February, 2015

ALBRIGHT, STODDARD, WARNICK & ALBRIGHT

By:
Whitney B. Warnick, Esq.
Nevada Bar No. 1573
801 South Rancho Drive, Suite D-4
Las Vegas, NV 89106
Attorney for Kathryn A. Bouvier

Dated this day of February, 2015

THE RUSHFORTH FIRM, LTD.

By:
Joseph J. Powell, Esq.
Nevada Bar No. 8875
1707 Village Center Circle, Ste. 150
Las Vegas, Nevada 89134
Attorney for Jacqueline M. Montoya

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DISTRICT COURT JUDGE

Submitted by:

MARQUIS AURBACH COFFING

By_____
Liane K. Wakayama, Esq.,
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Candice E. Renka, Esq.,
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10001 Park Run Drive
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Attorneys for Eleanor Connell Hartman Ahern, as Trustee and Individually

Approved as to Form and Content By:

Dated this day of February, 2015

ALBRIGHT, STODDARD, WARNICK & ALBRIGHT

By:_____
Whitney B. Warnick, Esq.
Nevada Bar No. 1573
801 South Rancho Drive, Suite D-4
Las Vegas, NV 89106
Attorney for Kathryn A. Bouvier

Dated this 9th day of February, 2015

THE RUSHFORTH FIRM, LTD.

By:_____
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1707 Village Center Circle, Ste. 150
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Attorney for Jacqueline M. Montoya

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EXHIBIT A

EXHIBIT A

Original

Electronically Filed
02/13/2015 04:18:18 PM

CLERK OF THE COURT

Marquis Aurbach Coffing
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DISTRICT COURT

CLARK COUNTY, NEVADA

In the Matter of THE W.N. CONNELL AND MARJORIE T. CONNELL LIVING TRUST DATED May 18, 1972, An Inter Vivos Irrevocable Trust.	Case No.: P-09-066425-T Dept. No.: 26 Date of Hearing: January 30, 2015 Time of Hearing: 10:00 a.m.

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IT IS SO ORDERED this 11 day of February, 2015.

DISTRICT COURT JUDGE

Submitted by:

MARQUIS AURBACH COFFING

By _____
Liane K. Wakayama, Esq.,
Nevada Bar No. 11313
Candice E. Renka, Esq.,
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10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Eleanor Connell Hartman Ahern, as Trustee and Individually

Approved as to Form and Content By:

Dated this day of February, 2015

ALBRIGHT, STODDARD, WARNICK & ALBRIGHT

By: _____
Whitney B. Warnick, Esq.
Nevada Bar No. 1573
801 South Rancho Drive, Suite D-4
Las Vegas, NV 89106
Attorney for Kathryn A. Bouvier

Dated this day of February, 2015

THE RUSHFORTH FIRM, LTD.

By: _____
Joseph J. Powell, Esq.
Nevada Bar No. 8875
1707 Village Center Circle, Ste. 150
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Attorney for Jacqueline M. Montoya

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IT IS SO ORDERED this ____ day of February, 2015.

DISTRICT COURT JUDGE

Submitted by:

MARQUIS AURBACH COFFING

By_____
Liane K. Wakayama, Esq.,
Nevada Bar No. 11313
Candice E. Renka, Esq.,
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10001 Park Run Drive
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Attorneys for Eleanor Connell Hartman Ahern, as Trustee and Individually

Approved as to Form and Content By:

Dated this day of February, 2015

ALBRIGHT, STODDARD, WARNICK & ALBRIGHT

By:_____
Whitney B. Warnick, Esq.
Nevada Bar No. 1573
801 South Rancho Drive, Suite D-4
Las Vegas, NV 89106
Attorney for Kathryn A. Bouvier

Dated this 9th day of February, 2015

THE RUSHFORTH FIRM, LTD.

By:_____
Joseph J. Powell, Esq.
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Attorney for Jacqueline M. Montoya

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IN THE SUPREME COURT OF THE STATE OF NEVADA

* * *

Electronically Filed
Nov 25 2015 02:35 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

IN THE MATTER OF: THE W.N. CONNELL AND MARJORIE T. CONNELL LIVING TRUST, DATED MAY 18, 1972,	Supreme Court No.: 66231 District Court Case No.: P-09-066425-T Appeal from the Eighth Judicial District Court, The Honorable Gloria Sturman Presiding
ELEANOR C. AHERN A/K/A ELEANOR CONNELL HARTMAN AHERN, Appellant, vs. JACQUELINE M. MONTOYA; AND KATHRYN A. BOUVIER, Respondents.	
IN THE MATTER OF THE W.N. CONNELL AND MARJORIE T. CONNELL LIVING TRUST, DATED MAY 18, 1972, AN INTER VIVOS IRREVOCABLE TRUST	Consolidated with: Supreme Court No.: 67782
ELEANOR CONNELL HARTMAN AHERN, Appellant, vs. KATHRYN A. BOUVIER; AND JACQUELINE M. MONTOYA, Respondents.	

IN THE MATTER OF THE W.N. CONNELL AND MARJORIE T. CONNELL LIVING TRUST, DATED MAY 18, 1972, AN INTER VIVOS IRREVOCABLE TRUST	Consolidated with: Supreme Court No.: 68046
ELEANOR CONNELL HARTMAN AHERN, Appellant, vs. JACQUELINE M. MONTOYA; AND KATHRYN A. BOUVIER, Respondents.	

MOTION TO FILE PORTIONS OF APPENDIX UNDER SEAL

Pursuant to Supreme Court Rules, Part VII, Rule 7, Eleanor C. Ahern a/k/a Eleanor Connell Hartman Ahern, by and through her counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, hereby moves this Honorable Court for leave to file portions of the Appendix to the Opening Brief under seal. Ms. Ahern filed her Opening Brief on November 20, 2015, together with an Appendix containing the following five documents filed with District Court under seal (collectively referred to as the "Sealed Documents"):

(1) *Brief Regarding Pending Issues Filed Under Seal* dated March 12, 2015, located at Volume 13, page numbers AA 2886-2890;

(2) *Brief Regarding Accounting, Fiduciary Duties and Trust Administration Filed Under Seal* dated March 13, 2015, located at Volume 14-15, page numbers AA2926-3192;

(3) *Supplement To Brief Regarding Pending Issues Filed Under Seal* dated March 18, 2015, located at Volume 15, pages numbers AA 3193-3252;

(4) *Supplement to Brief Regarding Accounting, Fiduciary Duties And Trust Administration Filed Under Seal* dated March 18, 2015, located at Volume 15, page numbers AA 3253-3266; and,

(5) *Second Supplement To Brief Regarding Pending Issues Filed Under Seal* dated March 19, 2015, located at Volume 15, page numbers AA 3276-3273.

The above-referenced Sealed Documents were filed under seal pursuant to a *Stipulation and Order to File Under Seal* dated February 13, 2015. (*See* Exhibit A, attached hereto.) The *Notice of Entry of Order to File Under Seal* was filed on February 17, 2015. (*See* Exhibit B, attached hereto.)

Part VII, Rule 7, of the Nevada Supreme Court Rules requires that records filed under seal with the District Court "be sealed from public access" in this Court:

> A civil court record or any portion of it that was sealed in the trial court shall be made available to the Nevada Supreme Court in the event of an appeal. Court records sealed in the trial court shall be sealed from public access in the Nevada Supreme Court subject to further order of that court.

Accordingly, because the Sealed Documents were sealed by the District Court, the Sealed Documents constituting portions of the Appendix to the Opening Brief must also be filed under seal. Ms. Ahern respectfully requests an order from this Court granting such relief.

Dated this 25th day of November, 2015.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: */s/ Tamara Beatty Peterson*
KIRK B. LENHARD, ESQ., Bar No. 1437
klenhard@bhfs.com
TAMARA BEATTY PETERSON, ESQ., Bar No. 5218
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Telephone: 702.382.2101
Facsimile: 702.382.8135

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed and served the foregoing **MOTION TO FILE PORTIONS OF APPENDIX UNDER SEAL** with the Clerk of the Court of the Supreme Court of Nevada by using the Court's Electronic Filing System on November 25, 2015 upon the following:

WHITNEY B. WARNICK, ESQ.
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801 South Rancho Drive, Suite D-4
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JOSEPH J. POWELL, ESQ.
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P.O. Box 371655
Las Vegas, NV 89137-1655
Attorneys for Jacqueline M. Montoya

I hereby certify that on November 25, 2015, I served a copy of this document by mailing a true and correct copy, postage prepaid, via U.S. Mail, addressed to the following:

MICHAEL K. WALL, ESQ.
HUTCHISON & STEFFEN, LLC
10080 West Alta Drive, Suite 200
Las Vegas, NV 89145
Attorneys for Fredrick P. Waid, Court-appointed Trustee

/s/ Paula Kay
an employee of Brownstein Hyatt Farber Schreck, LLP