

IN THE SUPREME COURT OF NEVADA

JAMES J. COTTER, JR., derivatively
on behalf of Reading International,
Inc.,

Petitioner,

v.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, IN AND FOR THE
COUNTY OF CLARK, AND THE
HONORABLE ELIZABETH
GONZALEZ, DISTRICT JUDGE,
DEPT. 11,

Respondents,

and

DOUGLAS MCEACHERN,
EDWARD KANE, JUDY CODDING,
WILLIAM GOULD, AND
MICHAEL WROTONIAK,

Real Parties in Interest.

Electronically Filed
Jan 02 2018 03:08 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO.:

District Court Case No. A-15-719860-B

**MOTION TO FILE UNDER SEAL
PORTIONS OF PETITIONER'S
APPENDIX**

Petitioner James J. Cotter, Jr. hereby moves the Court under the Supreme Court Rules Governing Sealing and Redacting Court Records ("SRCR") to seal selected portions of Petitioner's Appendix.

Under SRCR 7, "[c]ourt records sealed in the trial court shall be sealed from public access in the Nevada Supreme Court subject to further order of that court." An order from this Court is warranted to maintain the district court's sealing of certain records that are portions of the Appendix for this petition.

Nevada Supreme Court Rule 3.4 of part VII states, in relevant part: The court may order the court files and records, or any part thereof, in a civil action to be sealed or redacted, provided the

court makes and enters written findings that the specific sealing is justified by identified compelling privacy or safety interests that outweigh the public interest in access to the court record. . . . The public interest in privacy or safety interests that outweigh the public interest in open court records include findings that:

...

(b) The sealing or redaction furthers . . . a protective order entered under NRCF 26(c) . . .

The parties to this case entered into a Stipulated Confidentiality and Protective Order, which was approved and signed by Judge Elizabeth Gonzalez, and filed in the district court on October 27, 2015. A copy is attached hereto as Exhibit A. The Appendix includes documents that have been marked as "Confidential" in the underlying action. Based on the foregoing, Petitioner James J. Cotter, Jr. respectfully requests the Court to permit them to file the confidential portions of the Appendix under seal.

MORRIS LAW GROUP

By: /s/ STEVE MORRIS
Steve Morris, Esq. (NSB #1543)
Akke Levin, Esq. (NSB #9102)
411 E. Bonneville Ave., Ste. 360
Las Vegas, NV 89101

Mark G. Krum (NSB #10913)
Yurko, Salvesen & Remz, P.C.
1 Washington Mall, 11th Floor
Boston, MA 02108

Attorneys for Petitioner
James J. Cotter, Jr.

CERTIFICATE OF SERVICE

I certify that I am an employee of MORRIS LAW GROUP; I am familiar with the firm's practice of collection and processing documents for mailing; that, in accordance therewith, I caused the following document to be deposited with the U.S. Postal Service at Las Vegas, Nevada, in a sealed envelope, with first class postage prepaid, on the date and to the addressee(s) shown below I hereby certify that on the 2nd day of January, 2018, a true and correct copy of the foregoing **MOTION TO FILE UNDER SEAL PORTIONS OF PETITIONER'S APPENDIX** was served by the following method(s):

United States Postal Service:

Stan Johnson
Cohen-Johnson, LLC
255 East Warm Springs Road, Ste. 110
Las Vegas, Nevada 89119

Christopher Tayback
Marshall Searcy
Quinn Emanuel Urquhart & Sullivan LLP
865 South Figueroa Street, 10th Floor
Los Angeles, CA

Attorneys for Real Parties in Interest
Edward Kane, Douglas McEachern, Judy
Coddling, and Michael Wrotniak

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Nessim, Drooks, Lincenberg &
Rhow, P.C.
1875 Century Park East, 23rd Fl.
Los Angeles, CA 90067-2561

Attorneys for Real Parties in
Interest William Gould

Mark Ferrario
Kara Hendricks
Tami Cowden
Greenberg Traurig, LLP
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, NV 89169

Attorneys for Nominal Defendant
Reading International, Inc.

Dated: January 2, 2018

**Courtesy Copy Hand
Delivered**

To:

Judge Elizabeth Gonzalez
Eighth Judicial District
Court of
Clark County, Nevada
Regional Justice Center
200 Lewis Avenue
Las Vegas, Nevada 89101

By: /s/ PATRICIA FERRUGIA

EXHIBIT A

EXHIBIT A

CLERK OF THE COURT

1 NEO
2 MARK E. FERRARIO, ESQ.
3 (NV Bar No. 1625)
4 G. LANCE COBURN, ESQ.
5 (NV Bar No. 6604)
6 GREENBERG TRAURIG, LLP
7 3773 Howard Hughes Parkway
8 Suite 400 North
9 Las Vegas, Nevada 89169
10 Telephone: (702) 792-3773
11 Facsimile: (702) 792-9002
12 ferrariom@gtlaw.com
13 coburnl@gtlaw.com

14 *Counsel for Reading International, Inc.*

15 **DISTRICT COURT**

16 **CLARK COUNTY, NEVADA**

17 JAMES J. COTTER, JR., individually and
18 derivatively on behalf of Reading
19 International, Inc.

20 Plaintiff,

21 v.

22 MARGARET COTTER, ELLEN
23 COTTER, GUY ADAMS, EDWARD
24 KANE, DOUGLAS McEACHERN,
25 TIMOTHY STOREY, WILLIAM
26 GOULD, and DOES 1 through 100,
27 inclusive,

28 Defendants.

Case No. A-15-719860-B
Dept. No. XI

Coordinated with:
Case No. P-14-082942-E
Dept. No. XI

Jointly Administered

**NOTICE OF ENTRY OF
STIPULATED CONFIDENTIALITY
AND PROTECTIVE ORDER**

29 **READING INTERNATIONAL, INC., a
30 Nevada Corporation;**

31 Nominal Defendant

32 TO: All parties and their counsel of record:

33 YOU AND EACH OF YOU will please take notice that on October 22, 2015, the Court

GREENBERG TRAURIG, LLP
3773 Howard Hughes Parkway, Suite 400 North
Las Vegas, Nevada 89169
Telephone: (702) 792-3773
Facsimile: (702) 792-9002

1 entered the *Stipulated Confidentiality and Protective Order*, a copy of which is attached hereto
2 as Exhibit A.

3 DATED this 27th day of October, 2015

4 GREENBERG TRAURIG, LLP

5
6 /s/ Mark E. Ferrario

7 MARK E. FERRARIO, ESQ. (NV Bar No. 1625)
8 G. LANCE COBURN, ESQ. (NV Bar No. 6604)
9 3773 Howard Hughes Parkway, Suite 400 North
10 Las Vegas, NV 89169

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3773 Howard Hughes Parkway, Suite 400 North
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CERTIFICATE OF SERVICE

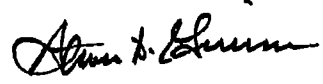
Pursuant to Nev. R. Civ. P. 5(b)(2)(D) and E.D.C.R. 8.05, I certify that on this day, I caused the *Notice of Entry of Stipulated Confidentiality and Protective Order* to be filed and served via the Court's Wiznet E-Filing system. The date and time of the electronic proof of service is in place of the date and place of deposit in the mail.

Dated this 27th day of October, 2015.

/s/ Andrea Lee Rosehill
An employee of GREENBERG TRAUERIG, LLP

GREENBERG TRAUERIG, LLP
3773 Howard Hughes Parkway, Suite 400 North
Las Vegas, Nevada 89169
Telephone: (702) 792-3775
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EXHIBIT A



CLERK OF THE COURT

1 SPO
2 MARK E. FERRARIO, ESQ.
3 (NV Bar No. 1625)
4 G. LANCE COBURN, ESQ.
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14 *Counsel for Reading International, Inc.*

15 DISTRICT COURT

16 CLARK COUNTY, NEVADA

17 JAMES J. COTTER, JR., individually and
18 derivatively on behalf of Reading
19 International, Inc.

20 Plaintiff.

21 v.

22 MARGARET COTTER, ELLEN
23 COTTER, GUY ADAMS, EDWARD
24 KANE, DOUGLAS McEACHERN,
25 TIMOTHY STOREY, WILLIAM
26 GOULD, and DOES 1 through 100,
27 inclusive,

28 Defendants.

Case No. A-15-719860-B
Dept. No. XI

Coordinated with:
Case No. P-14-082942-E
Dept. No. XI

Jointly Administered

~~PROPOSED~~ STIPULATED
CONFIDENTIALITY AND
PROTECTIVE ORDER

GREENBERG TRAUERIG, LLP
3773 Howard Hughes Parkway, Suite 400 North
Las Vegas, Nevada 89169
Telephone: (702) 792-3773
Facsimile: (702) 792-9002

1 READING INTERNATIONAL, INC., a
2 Nevada Corporation;

3
4 Nominal Defendant

5 The Parties jointly submit this Proposed Stipulated Confidentiality and Protective Order,
6 as follows:

7 In order to promote the efficient and expeditious disposition of the above captioned
8 matter, it is hereby stipulated that the following terms shall apply to the Parties' exchange of
9 information in connection with the case:

10 1. Designation of Information.

11 a. Any Party may designate any document, object, file, photograph, video, tangible
12 thing, interrogatory answers, answers to requests for admissions, testimony, or other material
13 portion thereof (collectively, the "Discovery Material") as "Confidential Information" (the
14 "Confidential Information") following a good faith determination that the information so
15 designated is or may reveal trade secrets or matters which are confidential or proprietary under
16 Nevada law or any other law the Court finds applicable. To designate documents, objects or
17 tangible things, a Party shall place the legend "Confidential" on each page of the document, or
18 securely affix the legend to the object or tangible thing. To designate written responses to
19 interrogatories or admissions, a Party shall place the legend "Confidential" on the face of the
20 relevant portions of the responses.

21 If any Discovery Material is disclosed in a form not appropriate for such placing or
22 affixing a legend, it shall be designated in writing by the producing Party as Confidential at the
23 time it is delivered to the receiving Party. The receiving Party shall treat print-outs, derivative

24 Page 2 of 14

25 Case No. A-15-719860-B Coordinated with: Case No. P-14-082942-E;

26 Dept. No. XI

27 PROPOSED STIPULATED CONFIDENTIALITY
28 AND PROTECTIVE ORDER

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1 data or manipulations of such material in accordance with any designations of **Confidential** as
2 provided for herein.

3 b. This Proposed Stipulated Confidentiality and Protective Order is entered without
4 prejudice to the right of any person to use any Confidential Information lawfully owned by that
5 person in any manner that he, she or it may deem appropriate, and any disclosure by such person
6 shall not be deemed a waiver of any Party's rights or obligations under this Confidentiality
7 Stipulation and Protective Order.

8 c. Nothing herein shall be construed to restrict any Party's use of information that is
9 lawfully possessed or known prior to disclosure by another Party, or is public knowledge, or is
10 independently developed or lawfully acquired outside of the production and exchange covered
11 by this Confidentiality Stipulation and Protective Order. Nothing contained in this provision or
12 elsewhere in this proposed Stipulated Confidentiality and Protective Order is intended to or shall
13 alter or affect the rights or obligations of any party that exist independent of proposed Stipulated
14 Confidentiality and Protective Order, including but not limited to any claims of confidentiality or
15 privilege any Party may have over documents, data or information currently in the possession of
16 any other Party.

17 **2. Deposition Testimony.**

18 a. A Party may designate all or any portion of a deposition, including exhibits
19 identified therein, conducted in connection with discovery as "**Confidential**" on the record of a
20 deposition or by sending, within fourteen (14) days after receiving a copy of the deposition
21 transcript, a written notice to all counsel and to the witness, setting forth the page and line
22 numbers of the portions of the transcript, as well as any exhibits thereto, to be so designated. All
23 Parties shall label the relevant pages of all such designated transcripts in their possession with

1 the appropriate legend. Until such fourteen (14) day time period expires, the entire volume of
2 the transcript and all Exhibits, not previously designated with a legend, shall be treated as
3 **Confidential**, unless otherwise specified.

4 b. The producing Party who discloses **Confidential Information** shall have the
5 right, but is not required, to exclude from attendance at the deposition during such time as the
6 **Confidential** is to be disclosed, any person other than the deponent and those who are set forth
7 in this Order and who are allowed to have access to such **Confidential** by the terms of this
8 Order. A Party does not waive any rights under this Order regarding confidentiality if it or he
9 does not exercise its or his rights to exclude persons from attendance at any or all of the
10 deposition.

11 3. **Disclosure of Confidential Information.**

12 **Confidential Information** shall not be disclosed to anyone other than the attorneys
13 of record in this action, the Court and its personnel, and to the following other persons, but then
14 only for purposes of prosecuting or defending this action and only to the extent reasonably
15 necessary to accomplish such purposes:

16 i. those attorneys, paralegals and staff of the Parties' attorneys and of the
17 respective law firms of the attorneys who are engaged by each Party in connection with the
18 Lawsuit;

19 ii. court reporters, stenographers or video operators at depositions, court or
20 arbitral proceedings at which **Confidential Information** is disclosed;

21 iii. clerical and data processing personnel involved in the production,
22 reproduction, organizing, filing, coding, cataloging, converting, storing, retrieving, review, and
23

1 xi. the defendants' insurers and reinsurers, as required in the ordinary course
2 of business, provided that each is provided with a copy of this Order and the insurers and
3 reinsurers execute **Exhibit A** to this Order, agreeing to be bound by this Order, before the
4 Confidential Information is disclosed to it; and

5 xii. any other person as all Parties may agree to in writing.

6
7 b. Any person to whom Confidential Information is disclosed pursuant to subparts i.-
8 iv. and vii.-xii. above shall be advised that the Confidential Information is being disclosed
9 pursuant to an order of the Court, that the information may not be disclosed by such person to
10 any person not permitted to have access to the Confidential Information pursuant to this
11 Protective Order, and that any violation of this Protective Order may result in the imposition of
12 such sanctions as the Court deems proper.

13 **4. Signature of Order and Consent to Stipulated Confidentiality and Protective**
14 **Order.**

15 Any individual described in paragraph 3(a)(v) and 3(b)(vi) must sign an affidavit in the
16 form attached hereto as Exhibit A prior to receiving any information designated as
17 "Confidential" by a Party other than the Party which has retained the expert or consultant.
18 Counsel of record for the Party that has retained the expert or consultant shall maintain the
19 original of each affidavit signed pursuant to this paragraph, and, with respect to any individual
20 that will be testifying as an expert witness, forward a copy of the affidavit to all other counsel of
21 record within ten (10) days after the individual is identified as a testifying expert witness. The
22 parties agree that they will not disclose Confidential Information to non-party witnesses or
23 consulting experts if the facts available present a good faith basis to believe that the non-party
24 witness or consulting expert would not abide by this Order, or would have a material conflict, or

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27 Dept. No. XI

28 **PROPOSED STIPULATED CONFIDENTIALITY
AND PROTECTIVE ORDER**

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1 that the disclosure would otherwise cause irreparable injury. Any Party seeking to prevent the
2 disclosure of **Confidential Information** to a non-party witness or consulting expert pursuant to
3 the terms of this paragraph bears the burden of proof to demonstrate a material conflict exists,
4 and after a meet and confer on the issue must, within six days after the meet and confer, file a
5 motion with the Court in that regard. No **Confidential Information** shall be disclosed to the
6 non-party witness or consulting expert until the Court resolves such a motion.

7 **5. Pleadings and Other Court Filings.**

8 The parties acknowledge that this Stipulated Protective Order does not entitle them to file
9 **Confidential Information** under seal. Any party seeking to include **Confidential Information**
10 in a motion or other pleading or as an exhibit or attachment to a motion or other pleading shall
11 seek to file it under seal pursuant to Rule 3 of the Nevada Rules for Sealing and Redacting Court
12 Records or by any other proper means. The parties agree not to oppose such motions, if the
13 document is properly marked as **Confidential Information**. If a motion or pleading filed with
14 the Court discloses **Confidential Information**, such designated portions shall be redacted to the
15 extent necessary to conceal such information in any motion or pleading filed publicly with the
16 Court, pending ruling by the Court on a motion to file it under seal. Unredacted motions or
17 pleadings containing **Confidential Information** shall be filed under seal, if the Court agrees
18 after proper motion. The parties agree not to oppose such motions, if the document is properly
19 marked as **Confidential Information**. When a Party, in good faith, determines that it is
20 necessary to bring the specific content of such **Confidential Information** to the attention of this
21 Court in the body of a motion or other pleading, then it shall file a motion seeking to disclose the
22 **Confidential Information** to the Court in camera or by such other means as the Court may deem

1 appropriate. Such motion may disclose the general nature, but shall not disclose the substance, of
2 the **Confidential Information** at issue.

3 **6. Hearings.**

4 If a Party wishes to use **Confidential Information** at a hearing before this Court or at
5 trial, it shall notify the Court and each of the other Parties to this action of that fact at the time the
6 hearing or trial commences, if and as feasible, and this Court may then take whatever steps it
7 may deem necessary to preserve the confidentiality of said information during the course of and
8 after the hearing or trial.

9 **7. Disputed Designations.**

10 Any Party may object to a "Confidential" designation by serving a written notice of
11 objection on all Parties and any designating third party, specifying with reasonable particularity
12 the material to which objection to the disputed designation is made. The Party or non-party who
13 made such designation shall have ten (10) business days from the receipt of such written notice
14 to conduct a conference with the Party giving written notice to discuss any and all such issues
15 raised in the written notice. Absent a consensual resolution of such issues, the Party (or non-
16 party) making the designation shall have the obligation of filing a motion with the Court in ten
17 (10) business days after the conference or such other time as is agreed in writing. Nothing herein
18 shall alter or affect which Party has the burden of establishing by that motion or opposing it that
19 the Discovery Material is or is not entitled to protection as Confidential Information. Nothing
20 herein abrogates the Parties' obligations to meet and confer prior to bringing any motions.
21 Nothing contained herein, including in this paragraph, is intended to bar or shall have the effect
22 of barring a non-designating Party from seeking relief from the Court with respect to the
23 designation of any Discovery Material as Confidential.

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8. Subsequent Designations.

Nothing in this Order shall prohibit a producing Party from designating, or otherwise waive a producing Party's right to designate, in accordance with this Order, any document, object, tangible thing, interrogatory answer, answer to requests for admissions, or deposition testimony as "Confidential" subsequent to its first disclosure or production.

9. Dissimilar Designations.

In the event that a Party inadvertently produces two or more identical copies of any Discovery Material with dissimilar designations, once such a discrepancy is discovered, all copies of the Discovery Material shall be treated in accordance with the most restrictive confidentiality designation used for such material.

10. Inadvertent Production.

Nothing in this Order shall require disclosure of any information that a Party contends is protected from disclosure by the attorney-client privilege, work-product doctrine, or any other legally recognized privilege or immunity. The inadvertent production of any Discovery Material that includes any such privileged information during discovery in this matter shall be without prejudice to any later claim that such material is privileged under the attorney-client privilege, work-product doctrine or any other legally recognized privilege or immunity, and no Party shall be held to have waived any rights by such inadvertent production. Upon written request by the producing Party, the receiving Party shall (a) return the original and all copies of such Discovery Material containing privileged information, (b) shall destroy the original and all copies of such Discovery Material if they cannot be returned; and (c) shall not use such privileged information for any purpose unless allowed by order of the Court.

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1775 Howard Hughes Parkway, Suite 400, North
Las Vegas, Nevada 89165
Telephone (702) 737-1775
Facsimile (702) 737-0867

1 disclosures were made of all the terms of this Order; and (d) request such person or persons to
2 execute the "Order and Consent" that is attached hereto as **Exhibit A**.

3 IT IS SO STIPULATED.

4 DATED this 6th day of October, 2015.

5 LEWIS ROCA ROTHGERBERG, LLP

6 By: [Signature]
7 MARK G. KRUM (NV Bar 10913)

8 *Attorneys for Plaintiff James J. Cotter, Jr.*

DATED this _____ day of October, 2015.

GREENBERG TRAURIG, LLP

By: [Signature] #7743
MARK E. FERRARIO (NV Bar No. 1625)
G. LANCE COBURN (NV Bar No. 6604)

Attorneys for Reading International, Inc.

10 DATED this _____ day of October, 2015.

11 MAUPIN COX & LeGOY

12 By: _____
13 DONALD A. LATTIN (NV Bar 0693)
14 CAROLYN K. RENNER NV Bar 9164)

15 *Attorneys for William Gould and Timothy Storey*

DATED this _____ day of October, 2015.

COHEN-JOHNSON, LLC

By: _____
H. STAN JOHNSON (NV Bar 00265)
MICHAEL V. JOHNSON (NV Bar 13154)

Attorneys for Ellen Marie Cotter and Ann Margaret Cotter Douglas McEachern, Guy Adams and Edward Kane

18 DATED this _____ day of October, 2015.

19 BIRD, MARELLA, BOXER, WOLPERT,
20 NESSIM, BROOKS, LINCENBERG & RHOW

21 By: _____
22 EKWAN E. RHOW (Pro Hac Vice)
BONITA D. MOORE (Pro Hac Vice)

23 *Attorney for Defendants William Gould and Timothy Storey*

DATED this _____ day of October, 2015.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: _____
CHRISTOPHER TAYBACK (Pro Hac Vice)
MARSHALL M. SEARCY (Pro Hac Vice)

Attorneys for Defendants Margaret Cotter, Ellen Cotter, Guy Adams, Edward Kane Douglas McEachern

1 disclosures were made of all the terms of this Order; and (d) request such person or persons to
2 execute the "Order and Consent" that is attached hereto as Exhibit A.

3 IT IS SO STIPULATED.

4 DATED this ____ day of October, 2015.

DATED this ____ day of October, 2015.

5 LEWIS ROCA ROTHGERBERG, LLP

GREENBERG TRAUIG, LLP

6 By: _____
7 MARK G. KRUM (NV Bar 10913)

By: _____
MARK E. FERRARIO (NV Bar No. 1625)
G. LANCE COBURN (NV Bar No. 6604)

8 *Attorneys for Plaintiff James J. Cotter, Jr.*

Attorneys for Reading International, Inc.

9
10 DATED this 9th day of October, 2015.

DATED this ____ day of October, 2015.

11 MAUPIN COX & LeGOY

COHEN JOHNSON, LLC

12 By: _____
13 DONALD A. LATTIN (NV Bar 0693)
14 CAROLYN K. RENNER (NV Bar 9164)

By: _____
H. STAN JOHNSON (NV Bar 00265)
MICHAEL V. JOHNSON (NV Bar 13154)

15 *Attorneys for William Gould and Timothy Storey*

Attorneys for Ellen Marie Cotter and Ann Margaret Cotter Douglas McEachern, Guy Adams and Edward Kane

16
17
18 DATED this ____ day of October, 2015.

DATED this 7 day of October, 2015.

19 BIRD, MARELLA, BOXER, WOLPERT,
20 NESSIM, DROOKS, LINCENBERG & RHOW

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

21 By: _____
22 EKWAN E. RHOW (Pro Hac Vice)
BONITA D. MOORE (Pro Hac Vice)

By: _____
CHRISTOPHER TAYBACK (Pro Hac Vice)
MARSHALL M. SEARCY (Pro Hac Vice)

23 *Attorney for Defendants William Gould and Timothy Storey*

Attorneys for Defendants Margaret Cotter, Ellen Cotter, Guy Adams, Edward Kane Douglas McEachern

24
25 Page 11 of 13

26 Case No. A-15-719860-B Coordinated with: Case No. P-14-082942-E;
27 Dept. No. XI

28 PROPOSED STIPULATED CONFIDENTIALITY
AND PROTECTIVE ORDER

LV 420546633v1

GREENBERG TRAURIG, LLP
3772 Howard Hughes Parkway, Suite 400 North
Las Vegas, Nevada 89169
Telephone: (702) 792-3773
Facsimile: (702) 792-8962

1 disclosures were made of all the terms of this Order; and (d) request such person or persons to
2 execute the "Order and Consent" that is attached hereto as Exhibit A.

3 IT IS SO STIPULATED.

4 DATED this _____ day of October, 2015.

5 LEWIS ROCA ROTHGERBERG, LLP

6 By: _____
7 MARK G. KRUM (NV Bar 10913)
8 *Attorneys for Plaintiff James J. Cotter, Jr.*

DATED this _____ day of October, 2015.

GREENBERG TRAURIG, LLP

By: _____
MARK E. FERRARIO (NV Bar No. 1625)
G. LANCE COBURN (NV Bar No. 6604)
Attorneys for Reading International, Inc.

10 DATED this _____ day of October, 2015.

11 MAUPIN COX & LeGOY

12 By: _____
13 DONALD A. LATTIN (NV Bar 0693)
14 CAROLYN K. RENNER NV Bar 9164

15 *Attorneys for William Gould and Timothy Storey*

DATED this 13 day of October, 2015.

COHEN-JOHNSON, LLC

By: Michael V. Hughes
H. STAN JOHNSON (NV Bar 00265)
MICHAEL V. JOHNSON (NV Bar 13154)

Attorneys for Ellen Marie Cotter and Ann Margaret Cotter Douglas McEachern, Guy Adams and Edward Kane

18 DATED this _____ day of October, 2015.

19 BIRD, MARELLA, BOXER, WOLPERT,
20 NESSIM, DROOKS, LINCENBERG & RHOW

21 By: _____
22 EKWAN E. RHOW (Pro Hac Vice)
BONITA D. MOORE (Pro Hac Vice)

23 *Attorney for Defendants William Gould and Timothy Storey*

DATED this _____ day of October, 2015.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: _____
CHRISTOPHER TAYBACK (Pro Hac Vice)
MARSHALL M. SEARCY (Pro Hac Vice)

Attorneys for Defendants Margaret Cotter, Ellen Cotter, Guy Adams, Edward Kane Douglas McEachern

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Facsimile: (702) 392-0902

1 disclosures were made of all the terms of this Order; and (d) request such person or persons to
2 execute the "Order and Consent" that is attached hereto as **Exhibit A**.

3 IT IS SO STIPULATED.

4 DATED this _____ day of October, 2015.

DATED this _____ day of October, 2015.

5 **LEWIS ROCA ROTHGERBERG, LLP**

GREENBERG TRAUERIG, LLP

6 By: _____
7 **MARK G. KRUM (NV Bar 10913)**

By: _____
8 **MARK E. FERRARIO (NV Bar No. 1625)**
9 **G. LANCE COBURN (NV Bar No. 6604)**

10 *Attorneys for Plaintiff James J. Cotter, Jr.*

Attorneys for Reading International, Inc.

11 DATED this _____ day of October, 2015.

DATED this _____ day of October, 2015.

12 **MAUPIN COX & LeGOY**

COHEN-JOHNSON, LLC

13 By: _____
14 **DONALD A. LATTIN (NV Bar 0693)**
CAROLYN K. RENNER NV Bar 9164)

By: _____
15 **H. STAN JOHNSON (NV Bar 00265)**
16 **MICHAEL V. JOHNSON (NV Bar 13154)**

17 *Attorneys for William Gould and Timothy Storey*

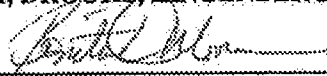
Attorneys for Ellen Marie Cotter and Ann Margaret Cotter Douglas McEachern, Guy Adams and Edward Kane

18 DATED this 7 day of October, 2015.

DATED this _____ day of October, 2015.

19 **BIRD, MARELLA, BOXER, WOLPERT,**
20 **NESSIM, DROOKS, LINCENBERG & RHOW**

QUINN EMANUEL URQUHART & SULLIVAN, LLP

21 By: 
22 **EKWAN E. RHOW (Pro Hac Vice)**
BONITA D. MOORE (Pro Hac Vice)

By: _____
23 **CHRISTOPHER TAYBACK (Pro Hac Vice)**
24 **MARSHALL M. SEARCY (Pro Hac Vice)**

25 *Attorney for Defendants William Gould and Timothy Storey*

Attorneys for Defendants Margaret Cotter, Ellen Cotter, Guy Adams, Edward Kane Douglas McEachern

26 Page 11 of 13

27 Case No. A-15-719860-B Coordinated with; Case No. P-14-082942-E;
28 Dept. No. XI

PROPOSED STIPULATED CONFIDENTIALITY AND PROTECTIVE ORDER

LV 420546633v1

1 disclosures were made of all the terms of this Order; and (d) request such person or persons to
2 execute the "Order and Consent" that is attached hereto as Exhibit A.

3 IT IS SO STIPULATED.

4 DATED this _____ day of October, 2015.

DATED this _____ day of October, 2015.

5 LEWIS ROCA ROTHGERBERG, LLP

GREENBERG TRAUERIG, LLP

6 By: _____
7 MARK G. KRUM (NV Bar 10913)

By: _____
MARK E. FERRARIO (NV Bar No. 1625)
G. LANCE COBURN (NV Bar No. 6604)
Attorneys for Reading International, Inc.

8 Attorneys for Plaintiff James J. Cotter, Jr.

10 DATED this _____ day of October, 2015.

DATED this _____ day of October, 2015.

11 MAUPIN COX & LeGOY

COHEN-JOHNSON, LLC

12 By: _____
13 DONALD A. LATTIN (NV Bar 0693)
14 CAROLYN K. RENNER NV Bar 9164)

By: _____
H. STAN JOHNSON (NV Bar 00265)
MICHAEL V. JOHNSON (NV Bar 13154)

15 Attorneys for William Gould and Timothy
16 Storey

Attorneys for Ellen Marie Cotter and Ann
Margaret Cotter Douglas McEachern, Guy
Adams and Edward Kane

18 DATED this _____ day of October, 2015.

DATED this 7 day of October, 2015.

19 BIRD, MARELLA, BOXER, WOLPERT,
20 NESSIM, DROOKS, LINCENBERG & RHOW

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

21 By: _____
22 EKWAN E. RHOW (Pro Hac Vice)
BONITA D. MOORE (Pro Hac Vice)

By: _____
CHRISTOPHER TAYBACK (Pro Hac Vice)
MARSHALL M. SEARCY (Pro Hac Vice)

23 Attorney for Defendants William Gould and
24 Timothy Storey.

Attorneys for Defendants Margaret Cotter, Ellen
Cotter, Guy Adams, Edward Kane
Douglas McEachern

25 Page 11 of 13

26 Case No. A-15-719860-B.Coordinated with: Case No. P-14-082942-E;
27 Dept. No. XI

28 PROPOSED STIPULATED CONFIDENTIALITY
AND PROTECTIVE ORDER

LV 420546633v1

1 DATED this 7th day of October, 2015.

2 ROBERTSON & ASSOCIATES

3
4 By: 
5 ALEXANDER ROBERTSON, IV

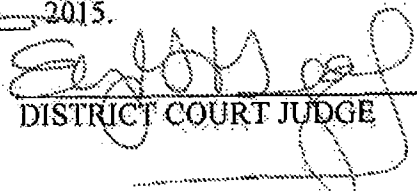
6 *Attorney for Intervenor Plaintiffs T2*
7 PARTNERS MANAGEMENT, LP,
8 T2 ACCREDITED FUND, LP,
9 T2 QUALIFIED FUND, LP,
10 TILSON OFFSHORE FUND, LTD.,
11 T2 PARTNERS MANAGEMENT I, LLC,
12 T2 PARTNERS MANAGEMENT GROUP,
13 LLC, JMG CAPITAL MANAGEMENT, LLC,
14 PACIFIC CAPITAL MANAGEMENT, LLC,
15 Derivatively on behalf of Reading
16 International, Inc.

13 **ORDER**

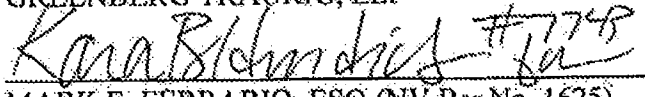
14 Upon stipulation of counsel and good cause appearing therefore,

15 The above AGREEMENT AND STIPULATION IS SO ORDERED.

16 DATED this 22nd day of Oct, 2015.

17 
18 DISTRICT COURT JUDGE

19 Submitted by:

20 GREENBERG TRAUIG, LLP
21  #7748
22 MARK E. FERRARIO, ESQ. (NV Bar No. 1625)
23 G. LANCE COBURN, ESQ. (NV Bar No. 6604)
24 3773 Howard Hughes Parkway, Suite 400 North
25 Las Vegas, NV 89169

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3773 Howard Hughes Parkway, Suite 400 North
Las Vegas, Nevada 89169
Telephone: (702) 793-3773
Facsimile: (702) 792-9002