

IN THE SUPREME COURT OF THE STATE OF NEVADA

JAMES J. COTTER, JR., DERIVATIVELY  
ON BEHALF OF READING  
INTERNATIONAL, INC.,

Appellant,

v.

EDWARD KANE, DOUGLAS  
McEACHERN, WILLIAM GOULD, JUDY  
CODDING, AND MICHAEL  
WROTNIAK, READING  
INTERNATIONAL, INC., A NEVADA  
CORPORATION,

Respondents.

Electronically Filed  
Jul 09 2018 04:30 p.m.  
Supreme Court Case No. 75053  
Clerk of Supreme Court

Case No. A-15-719860-B  
Coordinated with:  
Case No. P-14-0824-42-E

**STIPULATION TO SUSPEND  
BRIEFING AND PROCEEDINGS  
IN THIS RULE 54(b) APPEAL  
PENDING ENTRY OF AN  
ORDER DISMISSING THE  
REMAINDER OF PLAINTIFF'S  
CLAIMS AND HIS APPEAL  
FROM THAT ORDER**

MORRIS LAW GROUP  
Steve Morris, Bar No. 1543  
Akke Levin, Bar No. 9102  
411 E. Bonneville Ave., Ste. 360  
Las Vegas, Nevada 89101  
Telephone: (702) 474-9400  
Facsimile: (702) 474-9422

YURKO, SALVESEN & REMZ, P.C.  
Mark G. Krum, Bar No. 10913  
Noemi Ann Kawamoto (*admitted  
pro hac vice*)  
1 Washington Mall, 11th Floor  
Boston, MA 02108  
Telephone: (617) 723-6900

Attorneys for Appellant, James J. Cotter, Jr.

IT IS HEREBY STIPULATED under NRAP 31(b)(2), between appellant James J. Cotter Jr. ("Cotter Jr."), respondents William Gould, Douglas McEachern, Edward Kane, Judy Coddington, and Michael Wrotniak ("Respondents"), and Reading International Inc., (collectively, the "Parties") by and through their undersigned counsel, as follows:

1. On January 4, 2018, the district court certified as final under Nev. R. Civ. P. 54(b) a portion of its December 28, 2017 order that granted summary judgment in favor of Respondents on all of Cotter Jr.'s claims against them, dismissing Respondents from the case.

2. On February 1, 2018, Cotter Jr. appealed from the district court's order dismissing Respondents.

3. Cotter Jr.'s opening brief was initially due on June 10, 2018.

4. On June 8, 2018, Cotter Jr. and Respondents stipulated to extend the time to file their opening brief and answering brief to July 10, 2018, and September 10, 2018, respectively. The Court granted this stipulation by order dated June 26, 2018.

5. Trial on Cotter Jr.'s claims against the remaining three individual defendants – *i.e.*, Margaret Cotter, Ellen Cotter, and Guy Adams – was scheduled to begin on July 9, 2018.

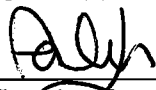
6. On June 19, 2018, however, the district court granted summary judgment in favor of the remaining three defendants on all Cotter Jr.'s claims. The Parties are in the process of negotiating a draft order on the summary judgment motion that includes the findings of fact and conclusions of law requested by the district court. They anticipate submitting proposed orders to the district court during the next week, on or before July 13, 2018.

7. Cotter Jr. will appeal from the order granting summary judgment against the remaining three defendants.

8. Rather than having two appeals proceed separately against two sets of individual defendants on overlapping legal issues, the Parties believe that it would be more efficient for them and for the Court to have a single appeal and briefing schedule to bring all the issues before the Court in a single appeal and one set of briefs and appendix.

9. The Parties jointly request the Court to suspend the current briefing schedule until the appeal of the remaining portion of the case is perfected, and the two appeals are consolidated.

MORRIS LAW GROUP

By:   
Steve Morris, Bar No. 1543  
Akke Levin, Bar No. 9102  
411 E. Bonneville Ave., Ste. 360  
Las Vegas, Nevada 89101

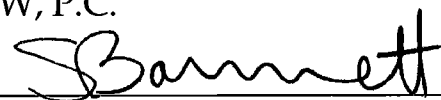
YURKO, SALVESEN & REMZ, P.C.  
Mark G. Krum, Bar No. 10913  
Noemi Ann Kawamoto (*admitted pro hac vice*)  
1 Washington Mall, 11th Floor  
Boston, MA 02108

*Attorneys for Appellant, James J. Cotter, Jr.*

MAUPIN, COX & LEGOY

Donald A. Lattin  
Carolyn K. Renner  
4785 Caughlin Parkway  
Reno, NV 89519

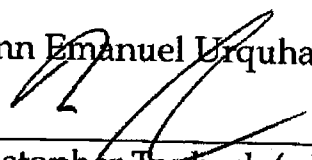
BIRD, MARELLA, BOXER, WOLPERT,  
NESSIM, DROOKS, LINCENBERG &  
RHOW, P.C.

By:   
Ekwan E. Rhow (*admitted pro hac vice*)  
Shoshana E. Barnett (*admitted pro hac vice*)  
1875 Century Park East, 23rd Fl.  
Los Angeles, CA 90067-2561  
seb@birdmarella.com

*Attorneys for Respondent  
William Gould*

COHEN-JOHNSON, LLC  
Stan Johnson  
255 East Warm Springs Road, Ste. 110  
Las Vegas, NV 89119

Quinn Emanuel Urquhart & Sullivan LLP

By:   
Christopher Tayback (*admitted pro hac vice*)

Marshall Searcy (*admitted pro hac vice*)  
865 South Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
christayback@quinnemanuel.com  
marshallsearcy@quinnemanuel.com

*Attorneys for Respondents Edward Kane,  
Douglas McEachern, Judy Coddling, and  
Michael Wrotniak*

Greenberg Traurig, LLP

By: \_\_\_\_\_

Mark Ferrario  
Kara Hendricks  
Tami Cowden  
3773 Howard Hughes Parkway  
Suite 400 North  
Las Vegas, NV 89169  
ferrariom@gtlaw.com  
hendricksk@gtlaw.com  
cowdent@gtlaw.com

*Attorneys for Reading International, Inc.*

COHEN-JOHNSON, LLC  
Stan Johnson  
255 East Warm Springs Road, Ste. 110  
Las Vegas, NV 89119

Quinn Emanuel Urquhart & Sullivan LLP

By: \_\_\_\_\_  
Christopher Tayback (*admitted pro hac vice*)  
Marshall Searcy (*admitted pro hac vice*)  
865 South Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
christayback@quinnemanuel.com  
marshallsearcy@quinnemanuel.com

*Attorneys for Respondents Edward Kane,  
Douglas McEachern, Judy Coddling, and  
Michael Wrotniak*

Greenberg Traurig, LLP

By: \_\_\_\_\_  
Mark Ferrario  
Kara Hendricks  
Tami Cowden  
3773 Howard Hughes Parkway  
Suite 400 North  
Las Vegas, NV 89169  
ferrariom@gtlaw.com  
hendricksk@gtlaw.com  
cowdent@gtlaw.com

*Attorneys for Reading International, Inc.*