In The Supreme Court of the State of Nevada

Supreme Court Case No. 75053

Electronically Filed
Dec 09 2019 12:11 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

JAMES J. COTTER, JR., Individually And Derivatively on Behalf of Reading International, Inc., Petitioner, v. DOUGLAS McEACHERN, EDWARD KANE, JUDY CODDING, MICHAEL WROTNIAK, MARY ANN GOULD, Personal Representative of the Estate of William Gould, AND Nominal Defendant READING INTERNATIONAL, INC., a Nevada Corporation, Respondents.	Coordinated with Case Nos. 76981, 77648, 77333 District Court Case No. A-15-719860-B

Appeal
Eighth Judicial District Court, Dept. XI
The Honorable Elizabeth G. Gonzalez

RESPONDENTS' MOTION FOR PERMISSION TO FILE PORTIONS OF ANSWERING BRIEF APPENDIX VOLUMES I AND II UNDER SEAL FOR CASE NO. 76981

H. STAN JOHNSON, ESQ. (SBN 00265)
COHEN|JOHNSON|PARKER|EDWARDS
375 E. Warm Springs Road
Suite 104
Las Vegas, Nevada 89119
(702) 823-3500
sjohnson@cohenjohnson.com

CHRISTOPHER TAYBACK, ESQ.*
MARSHALL M. SEARCY, ESQ.*
QUINN EMANUEL URQUHART &
SULLIVAN LLP
865 South Figueroa Street,
10th Floor
Los Angeles, CA 90017
213-443-3000
christayback@quinnemanuel.com
marshallsearcy@quinnemanuel.com
Admitted Pro Hac Vice

Respondents, by and through their counsel of record, hereby move, pursuant to SRCR, Part VII, Rules 3 and 7, for permission to file portions of Respondents' Answering Brief Appendix, Volumes I and II, under seal.

Each of these volumes contains papers or exhibits which the parties designated as "Highly Confidential" and were protected by the district court's order, which is attached hereto as Exhibit 1, and should not be made public pursuant to the district court's order.

Because these records are protected by court order, Respondents respectfully request that portions of the Answering Brief Appendix, Volumes I and II, be filed under seal. See SRCR Part VII, Rule 7 ("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.")

Dated this 9th day of December 2019.

COHEN|JOHNSON|PARKER|EDWARDS

/s/ H. Stan Johnson

H. Stan Johnson, Esq. (00265)
375 E. Warm Springs Road, Suite 104
Las Vegas, Nevada 89119

Christopher Tayback, Esq.*
Marshall M. Searcy, Esq.*
Quinn Emanuel Urquhart & Sullivan, LLP
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017

Attorneys of Record for Respondents Douglas McEachern, Edward Kane, Judy Codding, Michael Wrotniak, and Mary Ann Gould, Personal Representative of the Estate of William Gould

CERTIFICATE OF SERVICE

Pursuant to NRAP 25, I certify that I am an employee of COHEN|JOHNSON|PARKER|EDWARDS, that in accordance therewith, I caused a copy of **RESPONDENTS' MOTION FOR PERMISSION TO FILE PORTIONS OF ANSWERING BRIEF APPENDIX VOLUMES I AND II UNDER SEAL** to be served as indicated below, on the date and to the addressee(s) shown below:

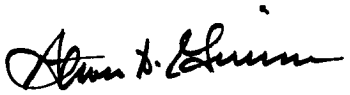
VIA THE COURT'S ELECTRONIC MAIL SYSTEM ON DECEMBER 9TH, 2019

Akke Levin, Las Vegas, NV, as counsel for Appellant
Steve Morris, Las Vegas, NV, as counsel for Appellant
H. Johnson, Las Vegas, NV, as counsel for Respondent
Tami Cowden, Las Vegas, NV, as counsel for Respondent
Kara Hendricks, Las Vegas, NV, as counsel for Respondent
Mark Ferrario, Las Vegas, NV, as counsel for Respondent

/s/ Sarah Gondek

EXHIBIT 1

Electronically Filed
10/23/2015 05:25:13 PM



CLERK OF THE COURT

SPO
MARK E. FERRARIO, ESQ.
(NV Bar No. 1625)
G. LANCE COBURN, ESQ.
(NV Bar No. 6604)
GREENBERG TRAURIG, LLP
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, Nevada 89169
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
ferrariom@gtlaw.com
coburnl@gtlaw.com

Counsel for Reading International, Inc.

DISTRICT COURT

CLARK COUNTY, NEVADA

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

Plaintiff.

v.

MARGARET COTTER, ELLEN COTTER, GUY ADAMS, EDWARD KANE, DOUGLAS McEACHERN, TIMOTHY STOREY, WILLIAM GOULD, and DOES 1 through 100, inclusive.

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

READING INTERNATIONAL, INC., a Nevada Corporation;

Nominal Defendant

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

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

1. **Designation of Information.**

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

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

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

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

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

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

2. **Deposition Testimony.**

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

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

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

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

3. **Disclosure of Confidential Information.**

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

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

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

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

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

translating of Confidential Information, to the extent reasonably necessary to assist the Parties or their Representatives in connection with the Lawsuit:

iv. in-house counsel for the Parties and those members of their staffs who are engaged in the conduct of this matter;

v. third party experts or independent consultants, who are retained by a Party or counsel for a Party to assist in this action, provided that each is provided with a copy of this Order and that such expert or consultant executes **Exhibit A** to this Order, agreeing to be bound by this Order;

vi. the Parties, and such officers, directors, and employees of the Parties as outside counsel for the Parties deem necessary to assist in connection with the Lawsuit;

vii. Party-affiliated persons who have been noticed for depositions or trial testimony;

viii. non-party persons, including former employees and individual counsel of said witness, who have been noticed or subpoenaed for depositions or subpoenaed for trial testimony;

ix. any person reflected as an author, addressee, or recipient of the Confidential Information being disclosed or any person to whom counsel for a Party in good faith believes likely received the Confidential Information in the ordinary course of business;

x. any other person designated by the Court, upon such terms as the Court may deem proper;

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

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

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

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

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

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

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

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

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

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

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

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

6. **Hearings.**

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

7. **Disputed Designations.**

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

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

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.

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

11. **Disclosure in Other Proceedings.**

If any Party is served with a subpoena or other process or discovery request, or is required to fulfill a disclosure obligation, that would require the production or disclosure, for some purpose other than this action, of any **Confidential Information** received by that Party in this action, the receiving Party shall notify the designating Party as soon as practicable of the subpoena, process or discovery request, or disclosure obligation, and if the designating Party so requests, shall take reasonable steps to permit the designating Party to oppose the subpoena, process, discovery request or disclosure obligation.

12. **Termination of Litigation.**

This action will be deemed to have terminated when all of the claims asserted by or against the Parties herein have been settled and compromised, or have been finally disposed of by judicial action, and all possible appeals have been exhausted or the time for filing any further appeals has passed. After the termination of this action, within thirty (30) days of a written request by the producing Party, each Party shall either return all **Confidential Information** to the Party that produced said information, or shall destroy same in a manner agreeable to the Party that produced said information and send a written confirmation to the Party that produced the information confirming that the required destruction has taken place.

13. **Modification of this Order.**

This Order may be modified by this Court at any time for good cause shown, or pursuant to a written Order by all persons and entities affected by the modification. The entry of this Order shall be without prejudice to the rights of any Party to apply for modification of this Order for additional or different protection where such protection is deemed necessary.

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

14. **Continuing Force and Effect of this Order.**

The provisions of this Order shall remain in full force and effect, and shall be binding after the termination of this action. The Court hereby specifically retains jurisdiction to enforce this Order after this action has been terminated.

15. **Unauthorized Disclosure of Confidential Information.**

If a Party learns that, by inadvertence or otherwise, it has disclosed **Confidential Information** to any person or in any circumstance not authorized under this Stipulated Protective Order, the Receiving Party must immediately (a) notify in writing the Designated Party of the unauthorized disclosures; (b) use its best efforts to retrieve all unauthorized copies of the **Confidential Information**; (c) inform the person or persons to whom unauthorized

/././

/././

/././

/././

/././

/././

/././

/././

/././

/././

/././

/././

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

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

IT IS SO STIPULATED.

DATED this 6th day of October, 2015.

LEWIS ROCA ROTHGERBERG, LLP

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

Attorneys for Plaintiff James J. Cotter, Jr.

DATED this _____ day of October, 2015.

GREENBERG TRAURIG, LLP

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

Attorneys for Reading International, Inc.

DATED this _____ day of October, 2015.

MAUPIN COX & LeGOY

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

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

DATED this _____ day of October, 2015.

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

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

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

GREENBERG TRAURIG, LLP

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

IT IS SO STIPULATED.

DATED this _____ day of October, 2015.

LEWIS ROCA ROTHGERBERG, LLP

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

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.

DATED this 9th day of October, 2015.

MAUPIN COX & LeGOY

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

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

DATED this _____ day of October, 2015.

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

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

Attorney for Defendants William Gould and Timothy Storey

DATED this 7 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

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

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

IT IS SO STIPULATED.

DATED this _____ day of October, 2015.

LEWIS ROCA ROTHGERBERG, LLP

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

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.

DATED this _____ day of October, 2015.

MAUPIN COX & LeGOY

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

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

DATED this _____ day of October, 2015.

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

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

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

GREENBERG TRAURIG, LLP
1773 Howard Hughes Parkway, Suite 400 North
Las Vegas, Nevada 89169
Telephone: (702) 792-3773
Facsimile: (702) 792-9002

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

IT IS SO STIPULATED.

DATED this _____ day of October, 2015.

LEWIS ROCA ROTHGERBERG, LLP

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

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.

DATED this _____ day of October, 2015.

MAUPIN COX & LeGOY

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

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

DATED this 7 day of October, 2015.

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

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

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

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

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

IT IS SO STIPULATED.

DATED this _____ day of October, 2015.

LEWIS ROCA ROTHGERBERG, LLP

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

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.

DATED this _____ day of October, 2015.

MAUPIN COX & LeGOY

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

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

DATED this _____ day of October, 2015.

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

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

Attorney for Defendants William Gould and Timothy Storey

DATED this 7 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

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

DATED this 7th day of October, 2015.

ROBERTSON & ASSOCIATES

By: _____
ALEXANDER ROBERTSON, IV

Attorney for Intervenor Plaintiffs T2 PARTNERS MANAGEMENT, LP, T2 ACCREDITED FUND, LP, T2 QUALIFIED FUND, LP, TILSON OFFSHORE FUND, LTD., T2 PARTNERS MANAGEMENT I, LLC, T2 PARTNERS MANAGEMENT GROUP, LLC, JMG CAPITAL MANAGEMENT, LLC, PACIFIC CAPITAL MANAGEMENT, LLC, Derivatively on behalf of Reading International, Inc.

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

ORDER

Upon stipulation of counsel and good cause appearing therefore,

The above AGREEMENT AND STIPULATION IS SO ORDERED.

DATED this 22nd day of October, 2015.

_____
DISTRICT COURT JUDGE

Submitted by:

GREENBERG TRAURIG, LLP

_____ #7745

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