

In the Supreme Court of Nevada

ST. PAUL FIRE & MARINE
INSURANCE COMPANY,

Appellant,

vs.

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA.; and
ROOF DECK ENTERTAINMENT, LLC
d/b/a MARQUEE NIGHTCLUB,

Respondents.

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Elizabeth A. Brown
Clerk of Supreme Court

**MOTION TO FILE UNDER SEAL
RESPONDENTS' SUPPLEMENTAL APPENDIX**

Respondents National Union Fire Insurance Company of Pittsburgh, PA. and Roof Deck Entertainment, LLC d/b/a Marquee Nightclub ask this Court for an order sealing the supplemental appendix. SRCR 3(1).

The appendix contains an unredacted copy of the “Nightclub Management Agreement between Nevada Restaurant Venture 1 LLC and Roof Deck Entertainment LLC.” This agreement was marked confidential in *Moradi v. Nevada Proper 1, LLC*, Case No. A698824, and was filed under seal in the district court in this case. Under SRCR 3(4)(g) and (h), this Court may seal records to protect intellectual proprietary

or property interests and other compelling interests. In light of the confidentiality agreement and the proprietary interests of third parties to this appeal, respondents ask that this Court keep the district court's sealing order intact.

Dated this 2nd day of August, 2021.

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CERTIFICATE OF SERVICE

I certify that on August 2, 2021, I submitted the foregoing “Motion to File under Seal Respondents’ Supplemental Appendix” for filing *via* the Court’s eFlex electronic filing system. Electronic notification will be sent to the following:

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