

1 directly to the conduct of the Defendant, so we believe  
2 that those incident reports need to be turned over  
3 unredacted.

4 We did address the Clark County Coroner's case  
5 and that case is about medical details regarding a  
6 decedent, autopsy reports. We're not looking for that  
7 kind of medical information.

8 We're looking for phone book information in this  
9 situation as to specifics, why they fell, so we know  
10 what the Venetian knew and when they knew it, that that  
11 stuff is relevant and proportionate to this case, and  
12 the Venetian, whose not demonstrated good cause for  
13 protecting this information.

14 Thank you, Your Honor.

15 THE COURT: Thank you.

16 Mr. Logan, you kept it tight, and Mr. Royal I  
17 don't think there was anything new argued there, so I  
18 don't know there's any final rebuttal, but I guess I  
19 want to make sure everybody's had the chance to sort of  
20 flush out everything they want too flush out, so any  
21 final word from you, Mr. Royal?

22 MR. ROYAL: No, Your Honor.

23 The fact is, the fact we are claimed as  
24 comparative fault here doesn't open the doors to  
25 providing all this private information to Plaintiff.

Electronically Filed  
Oct 11 2021 12:00 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

1           Keep in mind we still haven't heard from the  
2   Plaintiff as a right to a claim from the beginning to  
3   take this information in unredacted form and share it  
4   with whoever and however they want, that in an of itself  
5   is not being argued today is an admission we've shown  
6   good cause.

7           Thank you.

8           THE COURT: Thank you.

9           I think everybody did covering everything very  
10   well.

11           Obviously, Miss Randolph, I didn't come to you  
12   because I didn't see any joinders or anything, I wanted  
13   to hear from the moving parties so to speak, but because  
14   I also noted this is not really a motion, this is a  
15   motion to place on calendar to have the discussion  
16   necessary upon the remand from the Court of Appeals, is  
17   there something a third-party Defendant feels they have  
18   at stake here?

19           MS. RANDOLPH: No, there's nothing on behalf of  
20   the third-party Defendant.

21           Thank you.

22           THE COURT: Thank you, Miss Randolph.

23           All right. So I think the best way to orient  
24   this is to recognize that the Court had previously  
25   ordered what it had ordered, and had ultimately limited

1 the scope of the production from the date of the  
2 incident back five years prior, and the scope of the  
3 area to the Grand Lux Cafe, and so there's some argument  
4 here talks more broadly either way about those things  
5 the Court previously determined relevance to take, but  
6 did not determined, or at least there was no record of  
7 discussion of proportionality.

8 I think in all candor even though the rules now  
9 have that language, it certainly is always something  
10 that the Court is taking into account, but it is more  
11 formally now a requirement of the analysis, and of  
12 course when it comes to the protective order, I believe  
13 we had addressed to the degree necessary that we did not  
14 find persuasive protective order requirement, and that  
15 would if not explicitly by implication show there's no  
16 good cause.

17 In the end we obviously needed to and should have  
18 better articulated our thought process and applied  
19 certain factors and our evolution of our case, how first  
20 of all our evolution of our rules and evolution of our  
21 case law to be more in keeping with the federal case  
22 law, which was also persuasive, perhaps more persuasive  
23 at the time.

24 What the Court ultimately was trying to determine  
25 here in reversing the discovery commissioner in some

1 parts and ultimately making the rulings it made was to  
2 give the Plaintiff the opportunity to prove their case.

3 Obviously the Defense has the opportunity to  
4 provide its defense, but not to artificially withhold  
5 information the Plaintiff should be entitled to in order  
6 to put on their case, and Mr. Royal argues today that  
7 they really already have that information without there  
8 being more, and maybe they haven't actually engaged with  
9 the information they already received.

10 In the end the Court is going to keep in place  
11 for the most part the entirety of its prior orders with  
12 just a few adjustments, and I'm going to state for the  
13 record here today, without going into the details, I'm  
14 persuaded by Plaintiff's argument that this discovery is  
15 not only still relevant because the Court already made  
16 that determination, and I appreciate the Venetian is  
17 going for that to be revisited, but I don't think  
18 relevancy changes because some disclosures have been  
19 made.

20 The fact is, it's relevant, and there's not been  
21 the full disclosure sought by the Plaintiff or  
22 ultimately ordered by the Court, and when you look at  
23 the factors regarding proportionality, I believe they  
24 actually all weigh in favor of the Plaintiff, and I'm  
25 persuaded by Plaintiff's argument.

1 I'm not persuaded by the Venetian's argument that  
2 somehow the resources, the access to the information,  
3 the importance all of these things, don't weigh in favor  
4 of the Plaintiff, or somehow weigh in favor of the  
5 Venetian, but the reality is I think the Plaintiff has  
6 articulated specific rationales in order to not only put  
7 on its case, but address the Venetian's defense that --  
8 and this is potentially with the future medical bills  
9 and pass medical bills is potentially a million dollar  
10 plus case, that this is proportional, that there are  
11 important issues at stake in the action, that the  
12 Plaintiff has articulated the amount of controversy is  
13 well-met here, and there's case law that we can use  
14 again by comparison analysis were specific, if not  
15 directly on point, that shows us that.

16 The Venetian has the access to the information,  
17 has the resources to address it, it is important to the  
18 discovery to resolve the case, and I think the burden  
19 and expense does not outweigh the likely benefit.

20 Where I'm going to make an adjustment though is,  
21 that there is some case law persuasive, but all case law  
22 the Venetian pointed to, not the Porter case, but some  
23 of the other cases talked about, it's not HIPAA, but  
24 there are privacy expectations, privacy interests even  
25 beyond medical information to what was necessary for the

1 incident report, so what I'm trying to get at is, name,  
2 address, and telephone number, to the extent those  
3 things were provided by the individual who slipped and  
4 fell to the Venetian, and the Venetian otherwise has a  
5 policy to require or opt out, to share that information.

6 Otherwise, in the end I believe there's no  
7 expectation of privacy in those things from these  
8 individuals, it would be shared with third persons, to  
9 the extent they were self-reported, they fell, hit their  
10 knee, or hurt their leg, or whatever their report was,  
11 that is one thing.

12 To the extent that somebody came in and  
13 ultimately did other medical financial analysis, that  
14 would have provided protectable health information, EMTs  
15 coming in and assessing anything, those types of things  
16 exist in the record, I believe that medical information,  
17 the protected health insurance in the report should be  
18 be able to be redacted, if the Venetian wishes to be the  
19 one to protect that interest and is claiming that  
20 interest in privacy, not HIPAA, but again privacy in  
21 their report.

22 So in the end I believe that the proportionality  
23 and relevancy is there for all the reasons argued by the  
24 Plaintiff, and I should have mentioned this at the  
25 beginning, but I'm going to direct Mr. Logan to prepare

1 the order coming from today, we'll call it the order of  
2 clarification as he styled his motion to place on  
3 calendar, that was already for all intents and purposes  
4 granted because it's on the calendar, but what he was  
5 seeking in his motion of course was to have the Court  
6 make the determination the Court of Appeals indicated  
7 the Court had not previously made and to reinforce,  
8 reconfirm, whatever the right word is, its prior orders,  
9 and the Court's doing so today.

10 So I'm going to direct Mr. Logan to indicate,  
11 yes, the information sought by the Plaintiff is  
12 proportional in the case with the full analysis of all  
13 the factors under 26(b)(1), and ultimately the Venetian  
14 had established good cause for a limited protective  
15 order, and that limited protective order that protects  
16 the protected health information that may be contained  
17 in these reports.

18 Again, that would be should they have engaged  
19 with medical professionals who added health information  
20 to these incident reports beyond the scope of what these  
21 individuals people had self-reported by I fell and hit  
22 my knee, or fell and twisted my ankle, or something  
23 along those lines, which is not going to go into the  
24 health information that can be redacted, but not the  
25 information with regard to how to contact these

1 individuals.

2 To the extent there's personal identifying  
3 information that is really not being sought by the  
4 Plaintiff, it does not need to be styled they asked for  
5 what they call phone book information, name, address,  
6 phone number, to the extent those things could be  
7 publicly available.

8 Social security numbers should be redacted, dates  
9 of birth, I believe that is personal identifying  
10 information, also needs to be redacted, especially to  
11 the extent the Court did not previously preclude the  
12 Plaintiff from sharing this information finding no legal  
13 basis to preclude them from sharing this information  
14 with others, that information that is able to or capable  
15 of being used by others improperly, social security  
16 numbers, dates of birth, those can be redacted.

17 So in the end the order is, the Venetian will  
18 produce the incident reports limited to the Grand Lux  
19 rotunda area from November 4th, 2011 to November 4th,  
20 2016, inclusive of guest names and contact information,  
21 with all other information being redacted, and Plaintiff  
22 will please include in its order that it has made the  
23 analysis for proportionality previously not articulated,  
24 and made the good cause for protective order for the  
25 limited purpose stated, and please give Mr. Royal an



1 opportunity to review, please make sure we get that  
2 order from today's hearing, that's how you can style it,  
3 order from June 1st, 20021 hearing like they do in  
4 Family Court, keep it simple, and put the information in  
5 it, and to the extent there is still some challenge that  
6 the Venetian wishes to make, fine.

7 We'll keep dialing this in until we get where we  
8 need to go, but my point is, the Plaintiffs are entitled  
9 to this information, it is relevant, it is proportional,  
10 and the Venetian should be able to redact some  
11 information that crosses over into protected health  
12 information, but otherwise these are potential fact  
13 witnesses, and their contact information and the  
14 incident reports what occurred with them that was  
15 self-reported by these individuals, and was known to,  
16 potentially by -- utilized by a third party is not  
17 otherwise an expectation of privacy, and those things  
18 should all be provided.

19 So that's how we are going to finish it for  
20 today.

21 I appreciate the opportunity for the argument. I  
22 certainly appreciate there may be further challenge to  
23 this, and some day we will eventually get this matter  
24 either resolved or go to trial with whatever information  
25 is appropriate.

1           One thing Mr. Royal said, I do want to make sure  
2 I key on as we wrap up here today is, the Court has yet  
3 to make any ultimate determinations of admissibility of  
4 these things, and as Mr. Royal pointed out should these  
5 things be admissible, then maybe the Plaintiff already  
6 had what they needed.

7           The Court does not agree the Plaintiff already  
8 had everything they needed, and whether or not the  
9 Plaintiff engaged previously with the information we had  
10 is not relevant, but there is still much to be  
11 determined obviously while the Plaintiff investigates  
12 and looks at this relevant proportional information to  
13 determine what if any of it will actually be able to be  
14 utilized at the time of trial.

15           So I don't want there to be any mistake this  
16 Court is somehow by allowing this discovery to a secure  
17 place, making determinations as to admissibility, that  
18 has not been made at this time.

19           All right.

20           MR. ROYAL: Your Honor, I'm sorry.

21           I just have a point of clarification.

22           THE COURT: Go ahead.

23           MR. ROYAL: We have already provided prior  
24 incident reports to Plaintiff attached to their motion,  
25 and that information that you have now ordered redacted

1 is already out there, not only in this case, but other  
2 cases.

3 How do we address that?

4 THE COURT: Well --

5 MR. ROYAL: Once we give them the names and  
6 stuff, anybody can match them up and figure it out.

7 So may be made a public record.

8 THE COURT: I don't know how to address it  
9 because although you have said, Mr. Royal, this is what  
10 they've done with it, again the argument from the very  
11 beginning was they are not trying to actually find fact  
12 witnesses for their own case, they are trying to get up  
13 business for themselves and the colleagues and the  
14 Plaintiffs bar to come sue us for other things.

15 I don't know what happened or hasn't happened in  
16 that regard, I don't know how to do or undo anything,  
17 just what I'm saying is, I've made the ruling I needed  
18 to make, I believe it's appropriate under the case law  
19 and the direction given from our Court of Appeals.

20 I suppose we could do an oral motion on your part  
21 to deal with something previously gone out there, and  
22 they can't really claw it back, I don't believe at this  
23 point because I don't know what they've done with it, so  
24 in the end I guess we could argue to them or state this  
25 is an oral motion to have them claw back anything that

1 was put out that contained protective information that  
2 has been determined by the Court today to have needed to  
3 be redacted, and the Venetian provide the redacted  
4 reports, and/or we can just seal up the redacted ones,  
5 so they can't do a comparison.

6 You tell me.

7 I think there's several different ways to slice a  
8 pie. I can't take another 20, 30 minutes to figure this  
9 out, I have taken my entire morning calendar on one  
10 case.

11 So I think you guys can figure that out.

12 My guess, my suggestion in just sort of of brain  
13 storming is, the two options would be, let's deal with  
14 what is going to be now provided, and they can't do the  
15 comparison, but if you think there needs to be some  
16 other documentation showing that things haven't gone  
17 out, or things that have gone out we've asked for them  
18 back, or whatever, you tell me.

19 What is your thought, Mr. Royal?

20 MR. ROYAL: Your Honor, this has been filed -- or  
21 these have been filed as attachments to motions in other  
22 cases. I don't know who they've given them to. I can  
23 name two or three offices used them, so I'm just saying  
24 if they want us to provide unredacted information, we  
25 give them now the same reports with redacted medical

1 information in it, we we just got a problem, I don't  
2 know to provide all the information -- but, Your Honor,  
3 that's fine, I'll discuss that with counsel how we can  
4 deal with that.

5 And just for the record we'd like to ask the  
6 Court for a 30-day stay on the record to us allow us an  
7 opportunity to bring this back to the Appellate Court if  
8 necessary.

9 THE COURT: We granted it before. I don't have a  
10 problem granting it again.

11 Mr. Logan, do you want to address if you can come  
12 up with a way to address this that satisfies the  
13 Venetian, maybe they won't want to do their writ?

14 Some day again this case will go forward in a  
15 meaningful fashion.

16 I think the Court's making the right call on  
17 these things. I don't fault either side for its  
18 advocacy, but the only issue in my opinion that has hung  
19 this thing up is to the extent the Plaintiffs have  
20 instead of dealing with sharing the information with the  
21 necessary expert or other people relevant to the case,  
22 have provided to other members of the bar, so that they  
23 can support their own litigations, or possibly find new  
24 clients, then that is what takes this thing to a whole  
25 other level that causes the Venetian perhaps appropriate

1 concern.

2 To the extent you can come up with something that  
3 says, look we'll seal this, or we will not disclose  
4 that, or we'll agree only for that, again I don't think  
5 it's appropriate for me to order that, but Mr. Royal  
6 pointed out that if somebody wants to take the time and  
7 go through the comparisons, they can make these  
8 connections to the unredacted information, I don't see  
9 why Plaintiff can't resolve that.

10 But, Mr. Logan, anything you want to say on that  
11 point?

12 MR. LOGAN: Your Honor, I would just say, on my  
13 scout's honor I worked with Mr. Royal to come up with a  
14 solution. That said, I don't believe that there's  
15 really very much if any information that Court just now  
16 said should be excluded in those reports, so I think  
17 what Mr. Royal is claiming about really is not going to  
18 be an issue.

19 Also, I'd like to remind the Court that any  
20 disclosures that were made to others, as Mr. Royal said  
21 a number of times here, was before his law firm was ever  
22 involved. His law firm is now handling this case, and  
23 we are not disclosing this information to others.

24 So again, his worry is unfounded here in terms of  
25 what we're going to do with this information.

1           We want to share it with the jury, that's who we  
2           want to share it with.

3           THE COURT: To the extent there's a dispute as to  
4           the order itself, and how it addresses the issues of  
5           concern, then you guys can't work out something, and if  
6           it's not signed off by both counsel, somebody let my law  
7           clerk know, and submit your competing orders, and we'll  
8           take a look.

9           Okay.

10          (Proceedings concluded.)

## C E R T I F I C A T E

STATE OF NEVADA )

) ss.

CLARK COUNTY )

I, Bill Nelson, RMR, CCR 191, do hereby certify  
that I reported the foregoing proceedings; that the same  
is true and correct to the best of my ability  
considering the hearing by video under the Covid  
restrictions as reflected by my original machine  
shorthand notes taken at said time and place before the  
Hon. Kathleen Delaney, District Court Judge, presiding.

Dated at Las Vegas, Nevada this 16th day of June,  
2021.

/Bill Nelson

-----  
Bill Nelson, RMR, CCR 191,  
Certified Court Reporter  
Las Vegas, Nevada



<b>#</b>	16:21, 17:22, 18:25, 22:14, 28:18, 30:14, 31:10, 32:13	<b>applied</b> [1] - 25:18	<b>briefing</b> [3] - 6:12, 6:13, 7:8
<b>#191</b> [1] - 1:24	<b>access</b> [2] - 27:2, 27:16	<b>appreciate</b> [4] - 9:25, 26:16, 31:21, 31:22	<b>briefs</b> [1] - 6:7
<b>/</b>	<b>accident</b> [1] - 4:20	<b>approach</b> [1] - 20:24	<b>bring</b> [1] - 35:7
<b>/Bill</b> [1] - 38:19	<b>according</b> [1] - 10:11	<b>appropriate</b> [5] - 10:18, 31:25, 33:18, 35:25, 36:5	<b>bringing</b> [1] - 15:18
<b>1</b>	<b>account</b> [2] - 12:11, 25:10	<b>approves</b> [1] - 3:23	<b>broad</b> [1] - 5:17
<b>1</b> [2] - 1:18, 3:1	<b>acknowledge</b> [1] - 18:23	<b>arching</b> [1] - 4:19	<b>broadcasted</b> [1] - 19:18
<b>10:30</b> [1] - 21:25	<b>acronym</b> [1] - 13:10	<b>area</b> [6] - 14:22, 15:2, 15:6, 21:2, 25:3, 30:19	<b>broaden</b> [1] - 4:21
<b>16th</b> [1] - 38:16	<b>action</b> [1] - 27:11	<b>argue</b> [1] - 33:24	<b>broadly</b> [1] - 25:4
<b>191</b> [2] - 38:9, 38:20	<b>add</b> [1] - 15:13	<b>argued</b> [6] - 13:22, 15:14, 20:12, 23:17, 24:5, 28:23	<b>brought</b> [3] - 13:22, 14:2, 20:23
<b>1st</b> [1] - 31:3	<b>added</b> [1] - 29:19	<b>argues</b> [1] - 26:6	<b>burden</b> [6] - 6:25, 7:2, 7:5, 18:17, 21:6, 27:18
<b>2</b>	<b>address</b> [15] - 4:12, 9:20, 10:23, 13:16, 15:19, 22:4, 23:4, 27:7, 27:17, 28:2, 30:5, 33:3, 33:8, 35:11, 35:12	<b>arguing</b> [1] - 8:11	<b>business</b> [2] - 8:16, 33:13
<b>20</b> [1] - 34:8	<b>addressed</b> [3] - 10:9, 10:11, 25:13	<b>argument</b> [11] - 10:24, 11:1, 17:24, 17:25, 18:12, 25:3, 26:14, 26:25, 27:1, 31:21, 33:10	<b>BY</b> [1] - 1:23
<b>20021</b> [1] - 31:3	<b>addresses</b> [1] - 37:4	<b>arguments</b> [2] - 17:11, 17:13	<b>C</b>
<b>2011</b> [1] - 30:19	<b>adjustment</b> [1] - 27:20	<b>articulated</b> [4] - 25:18, 27:6, 27:12, 30:23	<b>Cafe</b> [1] - 25:3
<b>2016</b> [1] - 30:20	<b>adjustments</b> [1] - 26:12	<b>artificially</b> [1] - 26:4	<b>calendar</b> [11] - 4:12, 5:10, 6:16, 14:16, 21:20, 21:25, 24:15, 29:3, 29:4, 34:9
<b>2020</b> [2] - 14:21, 17:20	<b>admissibility</b> [2] - 32:3, 32:17	<b>assessing</b> [1] - 28:15	<b>candor</b> [1] - 25:8
<b>2021</b> [3] - 1:18, 3:1, 38:17	<b>admissible</b> [2] - 19:22, 32:5	<b>assistance</b> [1] - 18:8	<b>capable</b> [1] - 30:14
<b>2061</b> [1] - 4:17	<b>admission</b> [1] - 24:5	<b>associated</b> [1] - 17:9	<b>care</b> [1] - 18:7
<b>20th</b> [1] - 17:20	<b>adopted</b> [1] - 5:14	<b>attached</b> [3] - 14:16, 16:13, 32:24	<b>case</b> [49] - 4:9, 5:11, 5:15, 5:18, 6:14, 6:23, 7:7, 7:17, 8:2, 9:23, 10:17, 14:14, 15:25, 16:4, 16:16, 17:21, 18:1, 18:3, 18:11, 20:4, 20:21, 21:9, 21:11, 22:24, 22:25, 23:4, 23:5, 23:11, 25:19, 25:21, 26:2, 26:6, 27:7, 27:10, 27:13, 27:18, 27:21, 27:22, 29:12, 33:1, 33:12, 33:18, 34:10, 35:14, 35:21, 36:22
<b>25</b> [1] - 1:11	<b>advance</b> [2] - 3:17, 18:18	<b>attachments</b> [1] - 34:21	<b>Case</b> [1] - 1:11
<b>26(b)(1)</b> [1] - 29:13	<b>advertisements</b> [1] - 8:18	<b>authorities</b> [1] - 8:22	<b>cases</b> [6] - 11:11, 16:14, 18:9, 27:23, 33:2, 34:22
<b>26(d)</b> [2] - 19:5, 21:7	<b>advocacy</b> [1] - 35:18	<b>autopsy</b> [1] - 23:6	<b>CASINO</b> [1] - 1:12
<b>3</b>	<b>affiliates</b> [1] - 8:15	<b>availability</b> [1] - 7:3	<b>causes</b> [1] - 35:25
<b>30</b> [1] - 34:8	<b>agents</b> [1] - 8:16	<b>available</b> [1] - 30:7	<b>CCR</b> [3] - 1:24, 38:9, 38:20
<b>30-day</b> [1] - 35:6	<b>agree</b> [2] - 32:7, 36:4	<b>aware</b> [1] - 18:3	<b>certain</b> [3] - 10:6, 18:20, 25:19
<b>4</b>	<b>agreeing</b> [2] - 10:8, 10:9	<b>B</b>	<b>certainly</b> [10] - 6:12, 6:22, 11:7, 16:7, 16:22, 16:25, 18:15, 19:18, 25:9, 31:22
<b>4th</b> [2] - 30:19	<b>ahead</b> [2] - 13:4, 32:22	<b>balances</b> [1] - 19:13	<b>Certified</b> [1] - 38:21
<b>7</b>	<b>AL</b> [1] - 1:12	<b>bar</b> [2] - 33:14, 35:22	<b>CERTIFIED</b> [1] - 1:24
<b>70</b> [1] - 20:24	<b>albeit</b> [1] - 10:16	<b>based</b> [1] - 7:7	<b>certify</b> [1] - 38:9
<b>702-360-4677</b> [1] - 4:9	<b>alleged</b> [1] - 15:20	<b>basis</b> [1] - 30:13	<b>challenge</b> [2] - 31:5, 31:22
<b>9</b>	<b>allow</b> [2] - 5:21, 35:6	<b>beginning</b> [4] - 13:21, 24:2, 28:25, 33:11	<b>challenged</b> [1] - 4:23
<b>9:00</b> [1] - 1:18	<b>allowed</b> [4] - 4:22, 4:23, 10:19, 19:21	<b>begun</b> [1] - 22:24	<b>chance</b> [1] - 23:19
<b>A</b>	<b>allowing</b> [1] - 32:16	<b>belief</b> [1] - 9:12	<b>changes</b> [1] - 26:18
<b>A-18-772761-C</b> [1] - 1:11	<b>alternative</b> [1] - 7:3	<b>benefit</b> [1] - 27:19	<b>cholesterol</b> [1] - 11:16
<b>a.m</b> [1] - 1:18	<b>amount</b> [2] - 5:9, 27:12	<b>best</b> [2] - 24:23, 38:11	<b>circumstances</b> [6] - 10:4, 11:3, 14:8, 19:9, 19:24, 20:20
<b>ability</b> [1] - 38:11	<b>analysis</b> [11] - 4:25, 5:9, 5:12, 5:17, 5:24, 10:14, 25:11, 27:14, 28:13, 29:12, 30:23	<b>better</b> [2] - 7:13, 25:18	<b>cite</b> [1] - 5:18
<b>able</b> [11] - 4:7, 10:25, 15:15,	<b>analyzed</b> [1] - 4:17	<b>beyond</b> [2] - 27:25, 29:20	
	<b>ankle</b> [1] - 29:22	<b>Bill</b> [3] - 4:8, 38:9, 38:20	
	<b>anyway</b> [1] - 20:17	<b>BILL</b> [1] - 1:24	
	<b>apologize</b> [1] - 12:23	<b>bills</b> [2] - 27:8, 27:9	
	<b>Appeals</b> [8] - 4:13, 4:15, 5:4, 10:12, 10:14, 24:16, 29:6, 33:19	<b>binding</b> [2] - 5:19, 10:17	
	<b>APPEARANCES</b> [1] - 2:2	<b>birth</b> [2] - 30:9, 30:16	
	<b>appearances</b> [1] - 3:5	<b>book</b> [3] - 13:16, 23:8, 30:5	
	<b>Appellate</b> [3] - 5:14, 18:2, 35:7	<b>brain</b> [1] - 34:12	
	<b>application</b> [2] - 8:20, 8:21	<b>brief</b> [1] - 22:6	
		<b>briefed</b> [1] - 6:19	

<p><b>cited</b> [3] - 10:17, 11:11, 18:1  <b>claim</b> [2] - 20:8, 24:2  <b>claimed</b> [1] - 23:23  <b>claiming</b> [3] - 20:8, 28:19, 36:17  <b>claims</b> [5] - 7:8, 7:10, 8:5, 8:8, 9:8  <b>clarification</b> [2] - 29:2, 32:21  <b>CLARK</b> [2] - 1:6, 38:6  <b>Clark</b> [2] - 18:1, 23:4  <b>claw</b> [2] - 33:22, 33:25  <b>clear</b> [1] - 15:7  <b>clerk</b> [1] - 37:7  <b>client</b> [2] - 11:22, 22:13  <b>client's</b> [1] - 22:21  <b>clients</b> [1] - 35:24  <b>colleagues</b> [1] - 33:13  <b>coming</b> [2] - 28:15, 29:1  <b>commissioner</b> [8] - 14:3, 14:4, 15:9, 15:11, 16:11, 18:13, 19:2, 25:25  <b>company</b> [1] - 8:25  <b>comparative</b> [5] - 7:6, 13:23, 16:15, 17:13, 23:24  <b>comparison</b> [3] - 27:14, 34:5, 34:15  <b>comparisons</b> [1] - 36:7  <b>compelled</b> [1] - 22:2  <b>competing</b> [1] - 37:7  <b>complains</b> [1] - 11:10  <b>complete</b> [1] - 6:12  <b>complexity</b> [1] - 20:3  <b>compliance</b> [1] - 14:20  <b>comply</b> [1] - 8:23  <b>concede</b> [1] - 20:14  <b>concedes</b> [1] - 15:21  <b>concern</b> [3] - 11:13, 36:1, 37:5  <b>concession</b> [1] - 16:22  <b>concise</b> [1] - 10:1  <b>concluded</b> [1] - 37:10  <b>condition</b> [1] - 11:18  <b>conditions</b> [2] - 11:15  <b>conduct</b> [3] - 7:3, 8:18, 23:1  <b>confusion</b> [1] - 20:3  <b>connect</b> [1] - 19:3  <b>connected</b> [1] - 13:17  <b>connections</b> [1] - 36:8  <b>consider</b> [1] - 16:1  <b>consideration</b> [1] - 14:23  <b>considering</b> [1] - 38:12  <b>constitutional</b> [1] - 19:14  <b>contact</b> [13] - 7:25, 8:3, 8:5, 11:1, 14:10, 17:8, 17:22, 19:15, 21:1, 22:19, 29:25, 30:20, 31:13  <b>contained</b> [2] - 29:16, 34:1  <b>continued</b> [1] - 15:12  <b>contrary</b> [1] - 10:4</p>	<p><b>contribute</b> [1] - 20:2  <b>controversy</b> [1] - 27:12  <b>Coroner</b> [1] - 18:1  <b>Coroner's</b> [1] - 23:4  <b>correct</b> [2] - 17:6, 38:11  <b>correction</b> [1] - 17:1  <b>corrective</b> [1] - 17:12  <b>counsel</b> [12] - 3:5, 3:13, 3:14, 3:25, 6:9, 12:17, 14:9, 17:14, 19:10, 35:3, 37:6  <b>counsel's</b> [1] - 17:24  <b>COUNTY</b> [2] - 1:6, 38:6  <b>County</b> [2] - 18:1, 23:4  <b>course</b> [5] - 4:18, 4:21, 5:24, 25:12, 29:5  <b>COURT</b> [19] - 1:6, 1:24, 3:4, 3:13, 4:3, 4:5, 9:25, 12:14, 12:21, 15:1, 21:14, 23:15, 24:8, 24:22, 32:22, 33:4, 33:8, 35:9, 37:3  <b>Court</b> [60] - 3:15, 3:21, 3:23, 4:13, 4:15, 4:22, 4:23, 4:25, 5:4, 5:14, 5:20, 6:11, 8:21, 10:6, 10:11, 10:14, 12:3, 13:22, 14:3, 14:15, 14:16, 14:25, 15:1, 15:5, 15:7, 15:14, 15:18, 16:4, 16:20, 16:22, 18:2, 18:3, 18:5, 19:13, 24:16, 24:24, 25:5, 25:10, 25:24, 26:10, 26:15, 26:22, 29:5, 29:6, 29:7, 30:11, 31:4, 32:2, 32:7, 32:16, 33:19, 34:2, 35:6, 35:7, 36:15, 36:19, 38:15, 38:21  <b>Court's</b> [8] - 4:16, 4:24, 11:13, 14:21, 14:23, 16:1, 29:9, 35:16  <b>courtroom</b> [1] - 3:16  <b>covered</b> [2] - 10:1, 22:4  <b>covering</b> [1] - 24:9  <b>Covid</b> [1] - 38:12  <b>create</b> [1] - 20:3  <b>critical</b> [2] - 17:21, 18:2  <b>crosses</b> [1] - 31:11  <b>customers</b> [4] - 6:3, 8:10, 9:3, 9:11  <b>customers'</b> [1] - 8:14  <b>cut</b> [1] - 21:23</p>	<p><b>dealing</b> [2] - 4:19, 35:20  <b>decedent</b> [1] - 23:6  <b>defend</b> [1] - 9:2  <b>Defendant</b> [16] - 3:10, 7:8, 7:10, 7:24, 8:3, 8:4, 8:8, 8:11, 8:13, 9:3, 9:8, 9:17, 9:22, 23:1, 24:17, 24:20  <b>Defendant's</b> [4] - 7:7, 7:20, 8:7, 9:14  <b>Defendants</b> [3] - 1:13, 2:4, 3:8  <b>Defense</b> [1] - 26:3  <b>defense</b> [2] - 26:4, 27:7  <b>define</b> [1] - 16:16  <b>definitions</b> [1] - 18:6  <b>degree</b> [1] - 25:13  <b>Delaney</b> [2] - 1:17, 38:15  <b>demonstrated</b> [1] - 23:12  <b>Deposition</b> [1] - 13:7  <b>Dept</b> [1] - 1:11  <b>desire</b> [1] - 16:23  <b>detailed</b> [1] - 12:20  <b>details</b> [2] - 23:5, 26:13  <b>determination</b> [6] - 5:1, 5:5, 5:21, 6:13, 26:16, 29:6  <b>determinations</b> [3] - 4:24, 32:3, 32:17  <b>determine</b> [4] - 4:14, 19:11, 25:24, 32:13  <b>determined</b> [7] - 15:9, 16:4, 18:13, 25:5, 25:6, 32:11, 34:2  <b>dialing</b> [1] - 31:7  <b>different</b> [1] - 34:7  <b>direct</b> [2] - 28:25, 29:10  <b>directed</b> [2] - 3:22, 4:13  <b>direction</b> [1] - 33:19  <b>directly</b> [3] - 13:18, 23:1, 27:15  <b>disagree</b> [1] - 9:15  <b>disclose</b> [2] - 8:19, 36:3  <b>disclosed</b> [3] - 8:6, 9:18, 12:1  <b>disclosing</b> [1] - 36:23  <b>disclosure</b> [5] - 8:9, 8:24, 18:18, 19:11, 26:21  <b>disclosures</b> [2] - 26:18, 36:20  <b>discovery</b> [14] - 4:18, 5:10, 5:21, 14:3, 14:4, 15:9, 15:11, 16:11, 18:13, 19:1, 25:25, 26:14, 27:18, 32:16  <b>discuss</b> [2] - 22:25, 35:3  <b>discusses</b> [1] - 14:9  <b>discussion</b> [5] - 3:11, 20:15, 21:21, 24:15, 25:7  <b>dismissal</b> [1] - 21:25  <b>disorders</b> [1] - 11:14  <b>dispute</b> [1] - 37:3</p>	<p><b>disseminate</b> [1] - 15:16  <b>DISTRICT</b> [1] - 1:6  <b>District</b> [1] - 38:15  <b>documentation</b> [1] - 34:16  <b>dollar</b> [4] - 6:24, 18:19, 21:12, 27:9  <b>done</b> [3] - 14:12, 33:10, 33:23  <b>doors</b> [1] - 23:24  <b>dozens</b> [1] - 7:14  <b>driver's</b> [1] - 12:10  <b>dry</b> [5] - 20:11, 20:12, 20:14, 20:16, 20:19  <b>due</b> [1] - 7:9</p>
<b>E</b>			
<p><b>effort</b> [2] - 6:19, 14:19  <b>efforts</b> [1] - 9:5  <b>EIGHTH</b> [1] - 1:6  <b>either</b> [5] - 3:13, 3:25, 25:4, 31:24, 35:17  <b>emphasis</b> [1] - 18:5  <b>employees</b> [2] - 17:3, 17:9  <b>EMT</b> [2] - 12:19, 18:8  <b>EMTs</b> [1] - 28:14  <b>end</b> [8] - 5:6, 18:22, 25:17, 26:10, 28:6, 28:22, 30:17, 33:24  <b>enforcement</b> [1] - 8:22  <b>engaged</b> [3] - 26:8, 29:18, 32:9  <b>entire</b> [1] - 34:9  <b>entirety</b> [1] - 26:11  <b>entitled</b> [2] - 26:5, 31:8  <b>entity</b> [1] - 12:6  <b>equally</b> [1] - 5:16  <b>especially</b> [1] - 30:10  <b>Esq</b> [3] - 2:3, 2:4, 2:4  <b>essential</b> [1] - 11:17  <b>establish</b> [1] - 9:2  <b>established</b> [1] - 29:14  <b>ET</b> [1] - 1:12  <b>event</b> [1] - 19:16  <b>events</b> [2] - 9:6, 22:11  <b>eventually</b> [1] - 31:23  <b>evolution</b> [3] - 25:19, 25:20  <b>exactly</b> [1] - 22:24  <b>example</b> [2] - 13:15, 18:7  <b>excessively</b> [1] - 6:19  <b>excluded</b> [1] - 36:16  <b>exercise</b> [1] - 9:2  <b>Exhibit</b> [1] - 13:7  <b>exist</b> [1] - 28:16  <b>expanded</b> [1] - 21:3  <b>expectation</b> [2] - 28:7, 31:17  <b>expectations</b> [1] - 27:24  <b>expedition</b> [1] - 21:1  <b>expense</b> [1] - 27:19</p>			

<b>expert</b> <sup>[1]</sup> - 35:21 <b>explain</b> <sup>[2]</sup> - 5:10, 13:9 <b>explained</b> <sup>[2]</sup> - 5:16, 20:1 <b>explicitly</b> <sup>[1]</sup> - 25:15 <b>extent</b> <sup>[14]</sup> - 11:1, 13:12, 16:24, 19:21, 28:2, 28:9, 28:12, 30:2, 30:6, 30:11, 31:5, 35:19, 36:2, 37:3 <b>extremely</b> <sup>[1]</sup> - 22:6	<b>footnote</b> <sup>[1]</sup> - 18:4 <b>foregoing</b> <sup>[1]</sup> - 38:10 <b>foreign</b> <sup>[1]</sup> - 20:17 <b>foreseeability</b> <sup>[1]</sup> - 6:25 <b>form</b> <sup>[2]</sup> - 14:18, 24:3 <b>formally</b> <sup>[1]</sup> - 25:11 <b>forth</b> <sup>[5]</sup> - 12:18, 13:16, 17:14, 20:7, 20:23 <b>forward</b> <sup>[1]</sup> - 35:14 <b>frankly</b> <sup>[1]</sup> - 21:8 <b>freely</b> <sup>[1]</sup> - 16:21 <b>frustrates</b> <sup>[1]</sup> - 22:8 <b>full</b> <sup>[3]</sup> - 3:15, 26:21, 29:12 <b>fully</b> <sup>[1]</sup> - 12:11 <b>future</b> <sup>[1]</sup> - 27:8	<b>high</b> <sup>[1]</sup> - 11:16 <b>highlight</b> <sup>[2]</sup> - 6:20, 22:2 <b>highlighting</b> <sup>[1]</sup> - 21:19 <b>highlights</b> <sup>[1]</sup> - 6:10 <b>HIPAA</b> <sup>[8]</sup> - 12:5, 12:6, 12:7, 12:18, 18:6, 18:14, 27:23, 28:20 <b>HIPAA-protected</b> <sup>[1]</sup> - 12:5 <b>HIPAA-related</b> <sup>[3]</sup> - 12:7, 12:18, 18:14 <b>history</b> <sup>[3]</sup> - 12:19, 13:8, 15:25 <b>hit</b> <sup>[3]</sup> - 11:23, 28:9, 29:21 <b>hold</b> <sup>[1]</sup> - 12:22 <b>Hon</b> <sup>[1]</sup> - 38:15 <b>honor</b> <sup>[1]</sup> - 36:13 <b>Honor</b> <sup>[18]</sup> - 4:2, 4:4, 6:18, 11:7, 12:16, 15:3, 17:4, 18:22, 19:13, 20:10, 21:5, 21:13, 23:14, 23:22, 32:20, 34:20, 35:2, 36:12 <b>Honorable</b> <sup>[1]</sup> - 1:17 <b>hundreds</b> <sup>[1]</sup> - 7:11 <b>hung</b> <sup>[1]</sup> - 35:18 <b>hurt</b> <sup>[1]</sup> - 28:10	14:10, 19:3, 19:25, 28:8, 29:21, 30:1, 31:15 <b>information</b> <sup>[115]</sup> - 5:25, 6:1, 6:2, 6:3, 7:25, 8:4, 8:5, 8:9, 8:12, 8:14, 8:15, 8:19, 9:4, 9:6, 9:10, 9:12, 9:16, 9:20, 10:2, 10:8, 10:18, 10:21, 11:3, 11:9, 11:11, 11:12, 11:14, 11:16, 11:20, 11:23, 11:24, 11:25, 12:2, 12:3, 12:5, 12:7, 12:9, 12:12, 12:18, 13:10, 13:12, 13:14, 13:16, 13:17, 13:18, 14:10, 15:16, 15:23, 16:2, 16:13, 16:21, 17:3, 17:9, 17:18, 17:25, 18:14, 18:25, 19:3, 19:12, 19:15, 19:16, 19:20, 19:22, 20:22, 21:7, 21:10, 21:19, 22:18, 23:7, 23:8, 23:13, 23:25, 24:3, 26:5, 26:7, 26:9, 27:2, 27:16, 27:25, 28:5, 28:14, 28:16, 29:11, 29:16, 29:19, 29:24, 29:25, 30:3, 30:5, 30:10, 30:12, 30:13, 30:14, 30:20, 30:21, 31:4, 31:9, 31:11, 31:12, 31:13, 31:24, 32:9, 32:12, 32:25, 34:1, 34:24, 35:1, 35:2, 35:20, 36:8, 36:15, 36:23, 36:25 <b>informed</b> <sup>[1]</sup> - 9:3 <b>initial</b> <sup>[2]</sup> - 15:9, 15:19 <b>injured</b> <sup>[4]</sup> - 11:18, 11:23, 11:24, 12:13 <b>injury</b> <sup>[2]</sup> - 11:9, 12:8 <b>instance</b> <sup>[2]</sup> - 4:25, 10:16 <b>instances</b> <sup>[1]</sup> - 22:23 <b>instead</b> <sup>[1]</sup> - 35:20 <b>insurance</b> <sup>[1]</sup> - 28:17 <b>intent</b> <sup>[1]</sup> - 13:11 <b>intention</b> <sup>[1]</sup> - 17:8 <b>intents</b> <sup>[1]</sup> - 29:3 <b>interest</b> <sup>[6]</sup> - 9:11, 18:9, 18:16, 18:18, 28:19, 28:20 <b>interests</b> <sup>[3]</sup> - 16:5, 18:23, 27:24 <b>interrupt</b> <sup>[1]</sup> - 13:2 <b>investigates</b> <sup>[1]</sup> - 32:11 <b>invoice</b> <sup>[2]</sup> - 4:6, 4:8 <b>involved</b> <sup>[3]</sup> - 17:10, 18:23, 36:22 <b>issue</b> <sup>[6]</sup> - 13:21, 13:23, 15:10, 17:17, 35:18, 36:18 <b>issued</b> <sup>[1]</sup> - 5:13 <b>issues</b> <sup>[2]</sup> - 27:11, 37:4 <b>items</b> <sup>[1]</sup> - 5:7 <b>itself</b> <sup>[2]</sup> - 24:4, 37:4		
<b>F</b>					
<b>fact</b> <sup>[14]</sup> - 7:16, 7:18, 7:21, 7:25, 8:4, 9:14, 9:22, 10:25, 20:8, 23:23, 26:20, 31:12, 33:11 <b>factors</b> <sup>[6]</sup> - 5:12, 5:14, 16:1, 25:19, 26:23, 29:13 <b>facts</b> <sup>[5]</sup> - 14:1, 14:7, 14:8, 19:4, 19:9 <b>fail</b> <sup>[1]</sup> - 19:19 <b>failure</b> <sup>[1]</sup> - 4:16 <b>fall</b> <sup>[5]</sup> - 7:8, 7:12, 11:19, 20:9, 21:3 <b>fallen</b> <sup>[2]</sup> - 7:15, 17:19 <b>Family</b> <sup>[1]</sup> - 31:4 <b>far</b> <sup>[1]</sup> - 19:25 <b>fashion</b> <sup>[1]</sup> - 35:15 <b>fault</b> <sup>[7]</sup> - 7:12, 13:23, 16:15, 17:13, 22:21, 23:24, 35:17 <b>favor</b> <sup>[5]</sup> - 10:15, 12:21, 26:24, 27:3, 27:4 <b>feasibility</b> <sup>[1]</sup> - 7:3 <b>federal</b> <sup>[2]</sup> - 5:15, 25:21 <b>Federal</b> <sup>[1]</sup> - 5:19 <b>fell</b> <sup>[8]</sup> - 12:8, 12:13, 20:19, 23:9, 28:4, 28:9, 29:21, 29:22 <b>felt</b> <sup>[1]</sup> - 19:7 <b>few</b> <sup>[2]</sup> - 6:20, 26:12 <b>figure</b> <sup>[3]</sup> - 33:6, 34:8, 34:11 <b>filed</b> <sup>[2]</sup> - 34:20, 34:21 <b>filing</b> <sup>[2]</sup> - 15:5, 15:19 <b>final</b> <sup>[3]</sup> - 6:13, 23:18, 23:21 <b>financial</b> <sup>[2]</sup> - 8:25, 28:13 <b>fine</b> <sup>[3]</sup> - 13:17, 31:6, 35:3 <b>finish</b> <sup>[1]</sup> - 31:19 <b>firm</b> <sup>[2]</sup> - 36:21, 36:22 <b>first</b> <sup>[6]</sup> - 4:15, 4:25, 13:22, 15:13, 19:2, 25:19 <b>fishing</b> <sup>[1]</sup> - 21:1 <b>five</b> <sup>[1]</sup> - 25:2 <b>floor</b> <sup>[10]</sup> - 7:11, 20:11, 20:12, 20:13, 20:14, 20:16, 20:19, 22:14, 22:16 <b>flush</b> <sup>[2]</sup> - 23:20 <b>focusing</b> <sup>[1]</sup> - 6:11 <b>follow</b> <sup>[1]</sup> - 21:15 <b>follow-up</b> <sup>[1]</sup> - 21:15	<b>G</b>				
	<b>generalities</b> <sup>[1]</sup> - 16:18 <b>Geordan</b> <sup>[2]</sup> - 2:3, 3:6 <b>giveaways</b> <sup>[1]</sup> - 8:18 <b>given</b> <sup>[2]</sup> - 33:19, 34:22 <b>Glenby</b> <sup>[1]</sup> - 16:3 <b>government</b> <sup>[2]</sup> - 8:23, 12:6 <b>Grand</b> <sup>[5]</sup> - 14:22, 15:2, 15:6, 25:3, 30:18 <b>granted</b> <sup>[5]</sup> - 14:4, 14:5, 16:11, 29:4, 35:9 <b>granting</b> <sup>[2]</sup> - 10:7, 35:10 <b>gravity</b> <sup>[1]</sup> - 7:1 <b>great</b> <sup>[2]</sup> - 16:16, 21:18 <b>guess</b> <sup>[4]</sup> - 12:17, 23:18, 33:24, 34:12 <b>guest</b> <sup>[1]</sup> - 30:20 <b>guests</b> <sup>[2]</sup> - 9:1, 17:10 <b>guys</b> <sup>[2]</sup> - 34:11, 37:5	<b>H</b>			
	<b>hand</b> <sup>[1]</sup> - 11:19 <b>handing</b> <sup>[1]</sup> - 8:12 <b>handling</b> <sup>[1]</sup> - 36:22 <b>harm</b> <sup>[4]</sup> - 6:25, 7:1, 7:4, 8:25 <b>head</b> <sup>[1]</sup> - 11:24 <b>health</b> <sup>[11]</sup> - 13:10, 13:18, 17:25, 18:7, 19:16, 28:14, 28:17, 29:16, 29:19, 29:24, 31:11 <b>health-related</b> <sup>[1]</sup> - 19:16 <b>hear</b> <sup>[5]</sup> - 6:16, 10:3, 11:6, 21:24, 24:13 <b>heard</b> <sup>[1]</sup> - 24:1 <b>hearing</b> <sup>[4]</sup> - 12:25, 31:2, 31:3, 38:12 <b>heart</b> <sup>[1]</sup> - 11:15 <b>help</b> <sup>[1]</sup> - 6:6 <b>hereby</b> <sup>[1]</sup> - 38:9 <b>herring</b> <sup>[1]</sup> - 9:21		<b>I</b>		
		<b>idea</b> <sup>[3]</sup> - 9:10, 9:19, 12:4 <b>identified</b> <sup>[4]</sup> - 4:15, 14:13, 17:23, 20:25 <b>identify</b> <sup>[2]</sup> - 20:18, 20:21 <b>identifying</b> <sup>[2]</sup> - 30:2, 30:9 <b>immediately</b> <sup>[1]</sup> - 17:7 <b>implication</b> <sup>[1]</sup> - 25:15 <b>importance</b> <sup>[1]</sup> - 27:3 <b>important</b> <sup>[5]</sup> - 6:21, 22:11, 22:18, 27:11, 27:17 <b>improper</b> <sup>[2]</sup> - 16:7, 16:8 <b>improperly</b> <sup>[1]</sup> - 30:15 <b>IN</b> <sup>[1]</sup> - 1:6 <b>Inaudible</b> <sup>[1]</sup> - 7:1 <b>incident</b> <sup>[22]</sup> - 6:1, 7:14, 11:2, 11:8, 13:9, 13:25, 14:17, 16:9, 16:23, 17:10, 17:19, 19:4, 19:8, 20:6, 22:17, 23:2, 25:2, 28:1, 29:20, 30:18, 31:14, 32:24 <b>incidents</b> <sup>[5]</sup> - 14:6, 15:4, 19:21, 19:23, 20:17 <b>include</b> <sup>[2]</sup> - 18:6, 30:22 <b>including</b> <sup>[1]</sup> - 9:5 <b>inclusive</b> <sup>[1]</sup> - 30:20 <b>indicate</b> <sup>[1]</sup> - 29:10 <b>indicated</b> <sup>[2]</sup> - 5:4, 29:6 <b>indicates</b> <sup>[1]</sup> - 22:8 <b>indicator</b> <sup>[1]</sup> - 15:21 <b>individual</b> <sup>[1]</sup> - 28:3 <b>individuals</b> <sup>[9]</sup> - 4:20, 13:13,			

<p style="text-align: center;"><b>J</b></p> <p><b>job</b> [1] - 21:18  <b>joinders</b> [1] - 24:12  <b>JOYCE</b> [1] - 1:9  <b>Judge</b> [1] - 38:15  <b>JUDICIAL</b> [1] - 1:6  <b>June</b> [4] - 1:18, 3:1, 31:3, 38:16  <b>jury</b> [1] - 37:1</p>	<p><b>listening</b> [1] - 22:9  <b>litigation</b> [2] - 15:24, 19:7  <b>litigations</b> [1] - 35:23  <b>LLC</b> [1] - 1:12  <b>location</b> [1] - 19:10  <b>LOGAN</b> [7] - 3:6, 4:2, 4:4, 6:18, 11:7, 22:6, 36:12  <b>Logan</b> [13] - 2:3, 3:6, 4:3, 6:15, 9:25, 12:14, 12:24, 21:20, 23:16, 28:25, 29:10, 35:11, 36:10  <b>look</b> [5] - 8:13, 11:20, 26:22, 36:3, 37:8  <b>looking</b> [3] - 11:21, 23:6, 23:8  <b>looks</b> [1] - 32:12  <b>loss</b> [1] - 8:25  <b>Lux</b> [5] - 14:22, 15:2, 15:6, 25:3, 30:18</p>	<p>33:25  <b>MOTION</b> [1] - 1:16  <b>motions</b> [3] - 10:7, 16:13, 34:21  <b>moving</b> [2] - 6:14, 24:13  <b>MR</b> [16] - 3:6, 3:7, 4:2, 4:4, 6:18, 11:7, 12:16, 13:6, 15:3, 22:6, 23:22, 32:20, 32:23, 33:5, 34:20, 36:12  <b>MS</b> [2] - 3:9, 24:19  <b>multi</b> [3] - 6:24, 18:19, 21:11  <b>multi-million</b> [3] - 6:24, 18:19, 21:11  <b>must</b> [4] - 8:1, 9:22, 11:12, 20:13  <b>mute</b> [2] - 12:24, 12:25</p>	<p><b>numbers</b> [6] - 9:20, 12:10, 12:11, 30:8, 30:16</p>
<p style="text-align: center;"><b>K</b></p> <p><b>Kathleen</b> [2] - 1:17, 38:15  <b>keep</b> [6] - 6:20, 14:25, 24:1, 26:10, 31:4, 31:7  <b>keeping</b> [1] - 25:21  <b>kept</b> [1] - 23:16  <b>key</b> [1] - 32:2  <b>kind</b> [5] - 11:24, 17:17, 17:18, 20:20, 23:7  <b>knee</b> [5] - 11:18, 11:23, 28:10, 29:22  <b>known</b> [2] - 7:13, 31:15</p>	<p style="text-align: center;"><b>M</b></p> <p><b>machine</b> [1] - 38:13  <b>March</b> [2] - 14:21, 17:20  <b>marketing</b> [4] - 8:17, 9:4, 19:15  <b>match</b> [1] - 33:6  <b>matter</b> [8] - 3:14, 3:21, 4:1, 4:11, 5:9, 6:16, 6:22, 31:23  <b>matters</b> [1] - 21:24  <b>meaningful</b> [1] - 35:15  <b>medical</b> [20] - 6:2, 10:18, 11:2, 11:9, 11:11, 11:15, 11:17, 11:22, 12:19, 18:14, 20:6, 23:5, 23:7, 27:8, 27:9, 27:25, 28:13, 28:16, 29:19, 34:25  <b>meet</b> [2] - 5:11, 19:10  <b>members</b> [1] - 35:22  <b>mental</b> [1] - 11:14  <b>mention</b> [1] - 14:15  <b>mentioned</b> [1] - 28:24  <b>messages</b> [1] - 9:5  <b>met</b> [2] - 21:6, 27:13  <b>mic</b> [3] - 12:24, 12:25, 13:1  <b>Michael</b> [2] - 2:4, 3:7  <b>million</b> [4] - 6:24, 18:19, 21:11, 27:9  <b>mind</b> [3] - 6:8, 14:25, 24:1  <b>minimum</b> [2] - 18:24, 19:1  <b>minutes</b> [2] - 3:21, 34:8  <b>Miss</b> [2] - 24:11, 24:22  <b>mistake</b> [1] - 32:15  <b>morning</b> [1] - 34:9  <b>most</b> [4] - 6:21, 6:22, 13:8, 26:11  <b>motion</b> [11] - 16:10, 16:11, 21:7, 21:21, 24:14, 24:15, 29:2, 29:5, 32:24, 33:20,</p>	<p style="text-align: center;"><b>N</b></p> <p><b>name</b> [6] - 4:8, 10:22, 13:16, 28:1, 30:5, 34:23  <b>names</b> [4] - 7:24, 19:25, 30:20, 33:5  <b>necessarily</b> [2] - 10:22, 21:22  <b>necessary</b> [6] - 8:24, 24:16, 25:13, 27:25, 35:8, 35:21  <b>need</b> [16] - 4:9, 7:21, 10:25, 17:11, 17:12, 17:22, 18:20, 21:10, 21:22, 22:1, 22:2, 22:4, 22:14, 23:2, 30:4, 31:8  <b>needed</b> [5] - 25:17, 32:6, 32:8, 33:17, 34:2  <b>needs</b> [6] - 7:16, 11:25, 14:25, 20:22, 30:10, 34:15  <b>negligence</b> [1] - 7:6  <b>NELSON</b> [1] - 1:24  <b>Nelson</b> [4] - 4:8, 38:9, 38:19, 38:20  <b>NEVADA</b> [2] - 1:6, 38:4  <b>Nevada</b> [3] - 3:1, 38:16, 38:21  <b>never</b> [2] - 8:5, 14:12  <b>nevertheless</b> [1] - 18:9  <b>new</b> [2] - 23:17, 35:23  <b>non</b> [3] - 17:9, 18:11, 18:15  <b>non-employees</b> [1] - 17:9  <b>non-trivial</b> [2] - 18:11, 18:15  <b>none</b> [1] - 20:16  <b>note</b> [2] - 4:6, 17:1  <b>noted</b> [2] - 13:24, 24:14  <b>notes</b> [1] - 38:14  <b>nothing</b> [2] - 20:10, 24:19  <b>notice</b> [1] - 17:12  <b>November</b> [2] - 30:19  <b>NRCP</b> [1] - 4:17  <b>number</b> [5] - 4:9, 10:23, 28:2, 30:6, 36:21</p>	<p style="text-align: center;"><b>O</b></p> <p><b>obtain</b> [2] - 3:19, 4:7  <b>obviously</b> [6] - 6:7, 15:8, 24:11, 25:17, 26:3, 32:11  <b>occurred</b> [1] - 31:14  <b>OF</b> [1] - 38:4  <b>offered</b> [1] - 11:23  <b>offers</b> [1] - 9:6  <b>office</b> [1] - 4:9  <b>offices</b> [1] - 34:23  <b>official</b> [1] - 15:5  <b>officials</b> [1] - 8:23  <b>once</b> [2] - 15:20, 33:5  <b>one</b> [10] - 12:22, 13:20, 13:24, 14:13, 16:1, 16:16, 28:11, 28:19, 32:1, 34:9  <b>ones</b> [1] - 34:4  <b>open</b> [1] - 23:24  <b>opinion</b> [2] - 18:4, 35:18  <b>opinions</b> [1] - 10:4  <b>opportunities</b> [1] - 16:19  <b>opportunity</b> [9] - 3:18, 3:23, 6:9, 21:17, 26:2, 26:3, 31:1, 31:21, 35:7  <b>opposition</b> [1] - 15:7  <b>opt</b> [2] - 9:16, 28:5  <b>opted</b> [1] - 9:17  <b>options</b> [1] - 34:13  <b>oral</b> [2] - 33:20, 33:25  <b>order</b> [32] - 3:21, 5:3, 5:6, 5:13, 5:23, 7:16, 8:1, 8:22, 9:23, 10:10, 14:5, 14:19, 14:21, 16:10, 16:25, 17:20, 18:10, 25:12, 25:14, 26:5, 27:6, 29:1, 29:15, 30:17, 30:22, 30:24, 31:2, 31:3, 36:5, 37:4  <b>ordered</b> [5] - 10:6, 24:25, 26:22, 32:25  <b>orders</b> [3] - 26:11, 29:8, 37:7  <b>orient</b> [1] - 24:23  <b>original</b> [2] - 10:7, 38:13  <b>otherwise</b> [5] - 6:2, 28:4, 28:6, 31:12, 31:17  <b>outlined</b> [1] - 9:15  <b>outset</b> [1] - 18:12  <b>outside</b> [1] - 18:25  <b>outweigh</b> [1] - 27:19  <b>over-arching</b> [1] - 4:19  <b>own</b> [5] - 7:12, 11:22, 12:19, 33:12, 35:23</p>

<p style="text-align: center;"><b>P</b></p> <p><b>part</b> [3] - 21:7, 26:11, 33:20  <b>particular</b> [13] - 13:11, 13:13, 13:19, 14:1, 14:9, 17:19, 18:3, 18:11, 19:4, 19:7, 19:8, 19:12, 20:4  <b>particulars</b> [1] - 13:24  <b>parties</b> [3] - 4:7, 6:6, 24:13  <b>partners</b> [2] - 8:16, 8:17  <b>parts</b> [1] - 26:1  <b>party</b> [5] - 3:22, 6:15, 24:17, 24:20, 31:16  <b>pass</b> [1] - 27:9  <b>past</b> [1] - 11:13  <b>pending</b> [1] - 16:10  <b>people</b> [12] - 7:15, 7:16, 9:17, 12:2, 15:24, 17:22, 19:17, 20:2, 20:25, 22:15, 29:21, 35:21  <b>perhaps</b> [3] - 19:17, 25:22, 35:25  <b>permitted</b> [1] - 8:20  <b>person</b> [4] - 11:10, 11:17, 12:1, 12:8  <b>personal</b> [6] - 6:1, 8:15, 8:19, 9:4, 30:2, 30:9  <b>persons</b> [2] - 8:6, 28:8  <b>persuaded</b> [3] - 26:14, 26:25, 27:1  <b>persuasive</b> [6] - 5:19, 10:16, 25:14, 25:22, 27:21  <b>pertains</b> [1] - 13:12  <b>PHI</b> [1] - 13:10  <b>phone</b> [6] - 9:20, 10:23, 13:16, 23:8, 30:5, 30:6  <b>Phonetic</b> [1] - 16:4  <b>photographs</b> [2] - 17:16, 17:17  <b>physical</b> [1] - 8:25  <b>pie</b> [1] - 34:8  <b>pieces</b> [1] - 11:16  <b>place</b> [6] - 18:5, 24:15, 26:10, 29:2, 32:17, 38:14  <b>placed</b> [1] - 21:20  <b>placing</b> [1] - 5:9  <b>Plaintiff</b> [50] - 1:10, 2:3, 3:6, 4:11, 4:19, 5:8, 6:25, 7:2, 7:5, 7:10, 7:16, 8:1, 13:20, 13:24, 14:6, 14:12, 15:14, 15:15, 15:21, 15:22, 16:12, 17:20, 18:17, 19:7, 19:23, 20:6, 20:11, 20:13, 20:24, 23:25, 24:2, 26:2, 26:5, 26:21, 26:24, 27:4, 27:5, 27:12, 28:24, 29:11, 30:4, 30:12, 30:21, 32:5, 32:7, 32:9, 32:11, 32:24, 36:9  <b>Plaintiffs</b> [7] - 4:21, 5:17,</p>	<p>7:8, 16:15, 17:2, 26:14, 26:25  <b>Plaintiffs</b> [3] - 31:8, 33:14, 35:19  <b>plus</b> [1] - 27:10  <b>point</b> [7] - 15:6, 22:3, 27:15, 31:8, 32:21, 33:23, 36:11  <b>pointed</b> [3] - 27:22, 32:4, 36:6  <b>points</b> [1] - 18:20  <b>policies</b> [3] - 8:12, 9:14, 9:18  <b>policy</b> [2] - 8:13, 28:5  <b>Porter</b> [1] - 27:22  <b>position</b> [5] - 16:7, 19:1, 20:10, 20:16, 21:5  <b>possession</b> [1] - 7:24  <b>possible</b> [1] - 13:12  <b>possibly</b> [3] - 6:2, 12:24, 35:23  <b>potential</b> [1] - 31:12  <b>potentially</b> [3] - 27:8, 27:9, 31:16  <b>preclude</b> [2] - 30:11, 30:13  <b>prepare</b> [2] - 3:22, 28:25  <b>present</b> [2] - 16:19, 22:22  <b>presents</b> [1] - 14:9  <b>presiding</b> [1] - 38:15  <b>pretty</b> [1] - 12:20  <b>prevent</b> [1] - 8:24  <b>prevented</b> [1] - 7:4  <b>prevention</b> [1] - 9:7  <b>previous</b> [2] - 11:15, 22:22  <b>previously</b> [8] - 14:17, 24:24, 25:5, 29:7, 30:11, 30:23, 32:9, 33:21  <b>privacy</b> [15] - 8:9, 9:11, 13:14, 15:10, 16:5, 18:9, 18:16, 18:23, 19:14, 27:24, 28:7, 28:20, 31:17  <b>private</b> [5] - 6:1, 10:21, 13:18, 18:14, 23:25  <b>problem</b> [2] - 35:1, 35:10  <b>procedures</b> [1] - 8:12  <b>proceed</b> [1] - 12:3  <b>Proceedings</b> [2] - 1:19, 37:10  <b>proceedings</b> [1] - 38:10  <b>process</b> [2] - 8:21, 25:18  <b>produce</b> [1] - 30:18  <b>produced</b> [4] - 14:17, 14:18, 16:3, 17:16  <b>production</b> [1] - 25:1  <b>professionals</b> [1] - 29:19  <b>promotional</b> [1] - 8:17  <b>promotions</b> [1] - 9:6  <b>proof</b> [2] - 7:5, 9:19  <b>properly</b> [1] - 9:23  <b>property</b> [4] - 7:15, 7:20, 8:7, 21:4</p>	<p><b>proportional</b> [7] - 5:11, 5:22, 21:8, 27:10, 29:12, 31:9, 32:12  <b>proportionality</b> [7] - 4:17, 5:2, 10:9, 25:7, 26:23, 28:22, 30:23  <b>proportionally</b> [1] - 6:23  <b>proportionate</b> [1] - 23:11  <b>prosecute</b> [3] - 7:17, 8:1, 9:23  <b>protect</b> [3] - 9:8, 13:11, 28:19  <b>protectable</b> [2] - 6:3, 28:14  <b>protected</b> [12] - 8:8, 9:10, 9:12, 11:12, 11:21, 11:25, 12:5, 12:13, 19:5, 28:17, 29:16, 31:11  <b>protecting</b> [2] - 8:14, 23:13  <b>protection</b> [2] - 9:7, 18:10  <b>protective</b> [17] - 5:3, 5:5, 5:13, 5:23, 10:10, 13:10, 14:5, 14:19, 16:10, 16:25, 17:25, 25:12, 25:14, 29:14, 29:15, 30:24, 34:1  <b>protects</b> [1] - 29:15  <b>prove</b> [3] - 6:25, 7:2, 26:2  <b>provide</b> [5] - 8:3, 26:4, 34:3, 34:24, 35:2  <b>provided</b> [9] - 14:11, 17:4, 18:10, 28:3, 28:14, 31:18, 32:23, 34:14, 35:22  <b>provider</b> [1] - 18:7  <b>providers</b> [1] - 8:16  <b>provides</b> [2] - 8:11, 18:8  <b>providing</b> [1] - 23:25  <b>public</b> [4] - 9:1, 12:3, 18:18, 33:7  <b>publicly</b> [1] - 30:7  <b>pulled</b> [1] - 11:8  <b>punitive</b> [1] - 22:25  <b>purpose</b> [6] - 15:22, 16:6, 16:7, 16:8, 30:25  <b>purposes</b> [2] - 19:6, 29:3  <b>put</b> [8] - 4:11, 6:15, 14:16, 21:11, 26:6, 27:6, 31:4, 34:1</p> <p style="text-align: center;"><b>Q</b></p> <p><b>questions</b> [1] - 21:15  <b>quo</b> [1] - 10:13</p> <p style="text-align: center;"><b>R</b></p> <p><b>raise</b> [1] - 15:10  <b>raised</b> [1] - 12:4  <b>Randolph</b> [4] - 2:4, 3:9, 24:11, 24:22</p>	<p><b>RANDOLPH</b> [2] - 3:9, 24:19  <b>rather</b> [1] - 21:1  <b>rationales</b> [1] - 27:6  <b>read</b> [1] - 6:7  <b>reading</b> [1] - 22:9  <b>reality</b> [1] - 27:5  <b>really</b> [11] - 11:22, 13:14, 20:1, 21:15, 21:21, 24:14, 26:7, 30:3, 33:22, 36:15, 36:17  <b>reasons</b> [2] - 16:20, 28:23  <b>rebuttal</b> [3] - 21:22, 22:3, 23:18  <b>received</b> [2] - 12:2, 26:9  <b>recognize</b> [2] - 10:16, 24:24  <b>recognized</b> [1] - 18:15  <b>reconfirm</b> [1] - 29:8  <b>record</b> [14] - 3:12, 4:5, 4:10, 4:16, 5:1, 5:2, 6:9, 10:19, 25:6, 26:13, 28:16, 33:7, 35:5, 35:6  <b>recreate</b> [1] - 3:23  <b>red</b> [1] - 9:20  <b>redact</b> [3] - 17:8, 19:3, 31:10  <b>redacted</b> [17] - 7:23, 10:20, 14:7, 14:11, 14:18, 17:3, 28:18, 29:24, 30:8, 30:10, 30:16, 30:21, 32:25, 34:3, 34:4, 34:25  <b>redacting</b> [1] - 12:11  <b>redactions</b> [1] - 10:20  <b>reference</b> [1] - 18:1  <b>referring</b> [1] - 11:12  <b>reflected</b> [1] - 38:13  <b>refuses</b> [1] - 8:3  <b>regard</b> [3] - 10:20, 29:25, 33:16  <b>regarding</b> [5] - 5:1, 5:5, 12:18, 23:5, 26:23  <b>reinforce</b> [1] - 29:7  <b>relate</b> [1] - 20:17  <b>related</b> [5] - 12:7, 12:18, 14:1, 18:14, 19:16  <b>released</b> [1] - 7:23  <b>relevance</b> [2] - 14:22, 25:5  <b>relevancy</b> [2] - 26:18, 28:23  <b>relevant</b> [15] - 5:2, 6:22, 10:8, 13:25, 14:24, 19:9, 19:19, 21:8, 23:11, 26:15, 26:20, 31:9, 32:10, 32:12, 35:21  <b>remain</b> [1] - 10:19  <b>remand</b> [1] - 24:16  <b>remanded</b> [1] - 4:24  <b>remands</b> [1] - 4:12  <b>remember</b> [4] - 14:3, 20:9, 20:15, 21:2  <b>remind</b> [1] - 36:19  <b>reply</b> [3] - 15:19, 17:2, 20:12</p>
--	--	--	--

<p><b>report</b> [13] - 11:8, 11:21, 12:19, 13:25, 16:12, 19:8, 20:6, 20:7, 22:20, 28:1, 28:10, 28:17, 28:21</p> <p><b>reported</b> [6] - 3:14, 4:1, 28:9, 29:21, 31:15, 38:10</p> <p><b>REPORTED</b> [1] - 1:23</p> <p><b>Reporter</b> [3] - 3:15, 4:6, 38:21</p> <p><b>REPORTER</b> [1] - 1:24</p> <p><b>Reporter's</b> [1] - 1:19</p> <p><b>reporting</b> [1] - 12:8</p> <p><b>reports</b> [30] - 4:20, 6:1, 7:14, 7:22, 11:2, 12:9, 13:9, 13:19, 14:17, 15:4, 15:23, 16:9, 16:23, 17:10, 17:12, 17:16, 17:19, 19:5, 22:17, 22:18, 23:2, 23:6, 29:17, 29:20, 30:18, 31:14, 32:24, 34:4, 34:25, 36:16</p> <p><b>representing</b> [2] - 3:7, 3:9</p> <p><b>request</b> [5] - 3:16, 4:3, 4:18, 4:19, 4:21</p> <p><b>requested</b> [1] - 8:5</p> <p><b>requests</b> [1] - 8:23</p> <p><b>require</b> [1] - 28:5</p> <p><b>required</b> [2] - 8:20, 9:1</p> <p><b>requirement</b> [2] - 25:11, 25:14</p> <p><b>resolve</b> [3] - 6:24, 27:18, 36:9</p> <p><b>resolved</b> [1] - 31:24</p> <p><b>RESORT</b> [1] - 1:12</p> <p><b>Resort</b> [1] - 3:4</p> <p><b>resources</b> [2] - 27:2, 27:17</p> <p><b>respect</b> [7] - 15:8, 16:2, 16:15, 16:23, 17:24, 19:20, 21:6</p> <p><b>responding</b> [1] - 18:8</p> <p><b>response</b> [1] - 12:17</p> <p><b>responsibility</b> [1] - 20:9</p> <p><b>rest</b> [1] - 9:24</p> <p><b>restrictions</b> [1] - 38:13</p> <p><b>result</b> [1] - 7:12</p> <p><b>reveal</b> [1] - 11:2</p> <p><b>reverb</b> [1] - 13:3</p> <p><b>reversed</b> [1] - 4:24</p> <p><b>reversing</b> [1] - 25:25</p> <p><b>review</b> [2] - 6:12, 31:1</p> <p><b>reviewing</b> [1] - 21:18</p> <p><b>revisit</b> [2] - 5:6, 10:22</p> <p><b>revisited</b> [1] - 26:17</p> <p><b>ridiculous</b> [1] - 12:5</p> <p><b>rights</b> [2] - 8:10, 9:2</p> <p><b>RMR</b> [3] - 1:24, 38:9, 38:20</p> <p><b>rotunda</b> [1] - 30:19</p> <p><b>Royal</b> [6] - 2:4, 3:7, 21:14, 32:4, 33:9, 36:17</p> <p><b>ROYAL</b> [9] - 3:7, 12:16, 13:6,</p>	<p>15:3, 23:22, 32:20, 32:23, 33:5, 34:20</p> <p><b>royal</b> [19] - 10:3, 11:6, 11:11, 12:15, 12:21, 13:4, 15:1, 22:5, 22:7, 22:8, 23:16, 23:21, 26:6, 30:25, 32:1, 34:19, 36:5, 36:13, 36:20</p> <p><b>rules</b> [2] - 25:8, 25:20</p> <p><b>ruling</b> [1] - 33:17</p> <p><b>rulings</b> [1] - 26:1</p> <p style="text-align: center;"><b>S</b></p> <p><b>safety</b> [1] - 18:20</p> <p><b>Sami</b> [2] - 2:4, 3:9</p> <p><b>satisfies</b> [1] - 35:12</p> <p><b>scope</b> [6] - 4:23, 14:21, 17:20, 25:1, 25:2, 29:20</p> <p><b>scout's</b> [1] - 36:13</p> <p><b>seal</b> [2] - 34:4, 36:3</p> <p><b>second</b> [1] - 12:22</p> <p><b>secure</b> [1] - 32:16</p> <p><b>security</b> [4] - 12:10, 12:19, 30:8, 30:15</p> <p><b>see</b> [6] - 11:21, 11:22, 16:24, 19:19, 24:12, 36:8</p> <p><b>seeking</b> [1] - 29:5</p> <p><b>SEKERA</b> [1] - 1:9</p> <p><b>self</b> [3] - 28:9, 29:21, 31:15</p> <p><b>self-reported</b> [3] - 28:9, 29:21, 31:15</p> <p><b>Selker</b> [1] - 3:4</p> <p><b>sent</b> [1] - 10:14</p> <p><b>separate</b> [1] - 4:12</p> <p><b>service</b> [1] - 8:16</p> <p><b>set</b> [1] - 14:1</p> <p><b>several</b> [2] - 21:24, 34:7</p> <p><b>share</b> [9] - 8:14, 15:23, 16:21, 16:24, 18:25, 24:3, 28:5, 37:1, 37:2</p> <p><b>shared</b> [1] - 28:8</p> <p><b>sharing</b> [4] - 16:12, 30:12, 30:13, 35:20</p> <p><b>shifted</b> [1] - 18:17</p> <p><b>shoes</b> [7] - 7:9, 7:19, 17:14, 17:17, 20:20, 22:12, 22:15</p> <p><b>shorthand</b> [1] - 38:14</p> <p><b>shotgun</b> [1] - 20:23</p> <p><b>show</b> [4] - 15:8, 18:17, 21:6, 25:15</p> <p><b>showing</b> [2] - 4:16, 34:16</p> <p><b>shown</b> [2] - 18:24, 24:5</p> <p><b>shows</b> [1] - 27:15</p> <p><b>side</b> [3] - 21:17, 21:18, 35:17</p> <p><b>signed</b> [1] - 37:6</p> <p><b>significant</b> [1] - 5:9</p> <p><b>similar</b> [3] - 14:8, 19:9, 20:19</p> <p><b>simple</b> [2] - 6:20, 31:4</p> <p><b>simply</b> [1] - 12:7</p>	<p><b>situation</b> [1] - 23:9</p> <p><b>slice</b> [1] - 34:7</p> <p><b>slipped</b> [2] - 20:18, 28:3</p> <p><b>social</b> [3] - 12:9, 30:8, 30:15</p> <p><b>solution</b> [1] - 36:14</p> <p><b>someone</b> [1] - 20:18</p> <p><b>somewhere</b> [1] - 13:8</p> <p><b>sorry</b> [3] - 13:5, 14:11, 32:20</p> <p><b>sort</b> [6] - 6:5, 11:10, 19:15, 22:8, 23:19, 34:12</p> <p><b>sorts</b> [1] - 19:25</p> <p><b>sought</b> [6] - 5:3, 5:11, 21:7, 26:21, 29:11, 30:3</p> <p><b>specific</b> [3] - 5:18, 27:6, 27:14</p> <p><b>specifics</b> [2] - 17:5, 23:9</p> <p><b>spoken</b> [1] - 22:7</p> <p><b>ss</b> [1] - 38:5</p> <p><b>staff</b> [1] - 3:15</p> <p><b>stake</b> [2] - 24:18, 27:11</p> <p><b>stand</b> [1] - 22:3</p> <p><b>stands</b> [1] - 13:10</p> <p><b>STATE</b> [1] - 38:4</p> <p><b>state</b> [3] - 3:5, 26:12, 33:24</p> <p><b>statement</b> [1] - 17:5</p> <p><b>states</b> [1] - 9:7</p> <p><b>status</b> [1] - 10:13</p> <p><b>stay</b> [1] - 35:6</p> <p><b>still</b> [6] - 13:23, 19:18, 24:1, 26:15, 31:5, 32:10</p> <p><b>stopped</b> [1] - 13:3</p> <p><b>storming</b> [1] - 34:13</p> <p><b>stuff</b> [4] - 11:14, 22:20, 23:11, 33:6</p> <p><b>style</b> [1] - 31:2</p> <p><b>styled</b> [2] - 29:2, 30:4</p> <p><b>subject</b> [1] - 14:18</p> <p><b>subjects</b> [1] - 5:20</p> <p><b>submit</b> [1] - 37:7</p> <p><b>subpoena</b> [1] - 8:22</p> <p><b>substance</b> [1] - 20:17</p> <p><b>successfully</b> [1] - 15:15</p> <p><b>sue</b> [1] - 33:14</p> <p><b>sufficiently</b> [1] - 14:8</p> <p><b>suggestion</b> [1] - 34:12</p> <p><b>summarize</b> [1] - 6:5</p> <p><b>summary</b> [2] - 6:5, 10:1</p> <p><b>super</b> [1] - 6:20</p> <p><b>support</b> [2] - 12:11, 35:23</p> <p><b>suppose</b> [1] - 33:20</p> <p><b>sweepstakes</b> [1] - 8:18</p> <p style="text-align: center;"><b>T</b></p> <p><b>talks</b> [3] - 17:14, 19:23, 25:4</p> <p><b>telephone</b> [1] - 28:2</p> <p><b>terms</b> [3] - 4:17, 16:17, 36:24</p> <p><b>testimony</b> [1] - 20:5</p> <p><b>THE</b> [18] - 1:6, 3:4, 3:13, 4:3,</p>	<p>4:5, 9:25, 12:14, 12:21, 15:1, 21:14, 23:15, 24:8, 24:22, 32:22, 33:4, 33:8, 35:9, 37:3</p> <p><b>themselves</b> [1] - 33:13</p> <p><b>Thereupon</b> [1] - 3:11</p> <p><b>they've</b> [6] - 13:22, 16:19, 21:3, 33:10, 33:23, 34:22</p> <p><b>third</b> [4] - 24:17, 24:20, 28:8, 31:16</p> <p><b>third-party</b> [2] - 24:17, 24:20</p> <p><b>thoughts</b> [1] - 6:8</p> <p><b>thousands</b> [1] - 7:11</p> <p><b>three</b> [1] - 34:23</p> <p><b>throughout</b> [2] - 13:21, 21:3</p> <p><b>tight</b> [1] - 23:16</p> <p><b>today</b> [15] - 3:14, 4:5, 5:6, 6:8, 6:16, 14:23, 15:18, 24:5, 26:6, 26:13, 29:1, 29:9, 31:20, 32:2, 34:2</p> <p><b>today's</b> [1] - 31:2</p> <p><b>took</b> [1] - 12:19</p> <p><b>towards</b> [1] - 21:11</p> <p><b>TRAN</b> [1] - 1:1</p> <p><b>transcript</b> [3] - 3:19, 3:24, 4:7</p> <p><b>Transcript</b> [1] - 1:19</p> <p><b>traversed</b> [1] - 7:19</p> <p><b>trial</b> [2] - 31:24, 32:14</p> <p><b>trivial</b> [2] - 18:11, 18:15</p> <p><b>true</b> [1] - 38:11</p> <p><b>Trust</b> [1] - 16:3</p> <p><b>try</b> [1] - 10:22</p> <p><b>trying</b> [4] - 25:24, 28:1, 33:11, 33:12</p> <p><b>Tuesday</b> [2] - 1:18, 3:1</p> <p><b>turned</b> [1] - 23:2</p> <p><b>twisted</b> [1] - 29:22</p> <p><b>two</b> [4] - 4:12, 4:14, 34:13, 34:23</p> <p><b>type</b> [1] - 11:9</p> <p><b>types</b> [3] - 7:18, 9:5, 28:15</p> <p style="text-align: center;"><b>U</b></p> <p><b>ultimate</b> [1] - 32:3</p> <p><b>ultimately</b> [10] - 3:22, 4:21, 5:20, 5:22, 24:25, 25:24, 26:1, 26:22, 28:13, 29:13</p> <p><b>under</b> [5] - 12:6, 19:5, 29:13, 33:18, 38:12</p> <p><b>underlying</b> [1] - 5:24</p> <p><b>undo</b> [1] - 33:16</p> <p><b>unfairly</b> [1] - 21:23</p> <p><b>unfounded</b> [1] - 36:24</p> <p><b>unintentional</b> [1] - 17:6</p> <p><b>unredacted</b> [7] - 14:11, 15:23, 16:21, 23:3, 24:3, 34:24, 36:8</p>
--	---	--	--

<b>unrelated</b> <sup>[1]</sup> - 16:14 <b>up</b> <sup>[11]</sup> - 11:8, 21:15, 22:1, 32:2, 33:6, 33:12, 34:4, 35:12, 35:19, 36:2, 36:13 <b>updating</b> <sup>[1]</sup> - 13:8 <b>utilized</b> <sup>[2]</sup> - 31:16, 32:14	<b>written</b> <sup>[3]</sup> - 3:16, 3:18, 3:20
<b>V</b>	<b>Y</b>
<b>valid</b> <sup>[1]</sup> - 16:20 <b>Vegas</b> <sup>[3]</sup> - 3:1, 38:16, 38:21 <b>VENETIAN</b> <sup>[1]</sup> - 1:12 <b>Venetian</b> <sup>[31]</sup> - 3:4, 4:22, 5:3, 5:16, 6:4, 10:17, 12:1, 12:6, 15:10, 17:3, 17:10, 18:7, 21:3, 22:12, 22:20, 23:10, 23:12, 26:16, 27:5, 27:16, 27:22, 28:4, 28:18, 29:13, 30:17, 31:6, 31:10, 34:3, 35:13, 35:25 <b>Venetian's</b> <sup>[3]</sup> - 13:11, 27:1, 27:7 <b>verdict</b> <sup>[2]</sup> - 6:24, 21:12 <b>versus</b> <sup>[1]</sup> - 3:4 <b>video</b> <sup>[2]</sup> - 20:5, 38:12 <b>violation</b> <sup>[1]</sup> - 8:9 <b>violations</b> <sup>[1]</sup> - 16:5 <b>voluntarily</b> <sup>[1]</sup> - 8:6 <b>vs</b> <sup>[1]</sup> - 1:11	<b>years</b> <sup>[1]</sup> - 25:2
<b>W</b>	
<b>walked</b> <sup>[3]</sup> - 7:11, 22:14, 22:16 <b>wants</b> <sup>[2]</sup> - 20:13, 36:6 <b>warranted</b> <sup>[1]</sup> - 10:10 <b>ways</b> <sup>[1]</sup> - 34:7 <b>wearing</b> <sup>[5]</sup> - 7:9, 7:19, 22:13, 22:16 <b>weigh</b> <sup>[3]</sup> - 26:24, 27:3, 27:4 <b>well-met</b> <sup>[1]</sup> - 27:13 <b>whichever</b> <sup>[1]</sup> - 3:21 <b>whole</b> <sup>[2]</sup> - 12:4, 35:24 <b>wholesale</b> <sup>[1]</sup> - 6:12 <b>wish</b> <sup>[2]</sup> - 3:14, 6:10 <b>wishes</b> <sup>[2]</sup> - 28:18, 31:6 <b>withhold</b> <sup>[1]</sup> - 26:4 <b>witness</b> <sup>[1]</sup> - 20:5 <b>witnesses</b> <sup>[10]</sup> - 7:16, 7:18, 7:22, 7:25, 8:4, 9:22, 10:25, 20:1, 31:13, 33:12 <b>word</b> <sup>[3]</sup> - 18:15, 23:21, 29:8 <b>wore</b> <sup>[1]</sup> - 20:20 <b>world</b> <sup>[1]</sup> - 19:18 <b>worry</b> <sup>[1]</sup> - 36:24 <b>wrap</b> <sup>[2]</sup> - 22:1, 32:2 <b>writ</b> <sup>[1]</sup> - 35:13 <b>writing</b> <sup>[1]</sup> - 22:10	

---

**From:** Ashley Schmitt  
**Sent:** Friday, June 25, 2021 3:30 PM  
**To:** DC25Inbox@clarkcountycourts.us  
**Subject:** ORDR - A-18-772761-C - Sekera v. Venetian, et al  
**Attachments:** 4Prior Claims (post writ) - Judge to sign.pdf

Dept. 25,

Enclosed please find Venetian's proposed order related to the June 1, 2021 hearing. Both counsels have prepared separate proposed orders based on our understanding of the issues presented.

Thank you,

*Ashley Schmitt*

*Paralegal*



**ROYAL & MILES LLP**

1522 W. Warm Springs Road

Henderson, NV 89014

Telephone: 702-471-6777

Facsimile: 702-531-6777

Website: [royalmileslaw.com](http://royalmileslaw.com)

PRIVILEGED & CONFIDENTIAL: This communication, together with any attachments or links to this communication ("this communication"), is for the sole use of the intended addressee(s) and contains confidential and/or legally protected information. If you are not the intended recipient (or the employee or agent responsible for delivering this communication to the intended recipient), you are hereby notified that any review, disclosure, copying, dissemination, distribution or use of this communication is STRICTLY PROHIBITED. If you received this communication in error, please notify the sender immediately by return e-mail and by telephone at (702) 471-6777 and delete the original and all copies of this communication from your system.



**ORDR**

Michael A. Royal, Esq.  
Nevada Bar No. 4370  
Gregory A. Miles, Esq.  
Nevada Bar No. 4336

**ROYAL & MILES LLP**

1522 West Warm Springs Road  
Henderson Nevada 89014  
Tel: (702) 471-6777  
Fax: (702) 571-6777  
Email: [mroyal@royalmileslaw.com](mailto:mroyal@royalmileslaw.com)

*Attorneys for Defendants*  
*VENETIAN CASINO RESORT, LLC and*  
*LAS VEGAS SANDS, LLC*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

JOYCE SEKERA, an Individual;  
  
Plaintiff,

v.

VENETIAN CASINO RESORT, LLC, d/b/a  
THE VENETIAN LAS VEGAS, a Nevada  
Limited Liability Company; LAS VEGAS  
SANDS, LLC d/b/a THE VENETIAN LAS  
VEGAS, a Nevada Limited Liability Company;  
YET UNKNOWN EMPLOYEE; DOES I  
through X, inclusive,  
  
Defendants.

CASE NO.: A-18-772761-C  
DEPT. NO.: 25

**ORDER OF CLARIFICATION ON**  
**PRODUCTION OF PRIOR INCIDENT**  
**REPORTS**

Plaintiff JOYCE SEKERA, by and through her counsel of record, CLAGGETT & SYKES  
LAW FIRM and THE GALLIHER LAW FIRM, filed Plaintiff's Motion to Place on Calendar on April  
30, 2021 for the Court to reconsider issues related to the production of prior incident reports within  
the Grand Lux rotunda dome area of the Venetian Casino Resort from November 4, 2011 to November  
4, 2016 in light of *Venetian Casino Resort, LLC et al v. Eighth Judicial District Court et al*, 136 Nev.  
Adv. Rep. 26, 467 P.3d 1 (2020), following two writ petitions filed on September 27, 2019 and March  
17, 2020, respectively, by Defendants VENETIAN CASINO RESORT, LLC, and LAS VEGAS  
SANDS, LLC (collectively *Venetian*), by and through their counsel of record, ROYAL & MILES

1 LLP. On May 14, 2021, Venetian filed an Opposition to Plaintiff's Motion to Place on Calendar.  
2 Plaintiff filed a Reply on May 25, 2021.

3 This matter came before the Court for hearing at 9:00 am on June 1, 2021. Plaintiff appeared  
4 by and through her counsel, Geordan G. Logan, Esq., of Claggett & Sykes Law Firm, Defendant  
5 Venetian appeared by and through its counsel of record, Michael A. Royal, Esq., of Royal & Miles  
6 LLP, and Third-Party Defendant BRAND VEGAS, LLC, appeared by and through its counsel of  
7 record, Sami N. Randolph, Esq., of HOOKS MENG & CLEMENT.  
8

### 9 **BACKGROUND**

10 This matter arises from a November 4, 2016 slip and fall involving the Plaintiff on Venetian  
11 property in the course and scope of her employment as a kiosk ticket sales representative for Brand  
12 Vegas, LLC, in which she alleges to have sustained personal injuries.

#### 13 A. **Venetian's Motion for Protective Order, February 1, 2019 (Prior Incidents from** 14 **November 4, 2013 to November 4, 2016)**

15 On August 16, 2018, Plaintiff sent discovery to Venetian requesting copies of slip and fall  
16 related incident reports occurring on Venetian property from November 4, 2013 to the present.  
17 Venetian responded by producing prior incident reports from November 4, 2013 to November 4, 2016  
18 with all information identifying non-Venetian guests redacted and filed a motion for protection under  
19 NRCP 26(c) with the Discovery Commissioner on February 1, 2019. The Discovery Commissioner  
20 filed a Discovery Commissioner's Report and Recommendation on April 4, 2019, recommending that  
21 Venetian's motion for protection be granted, finding that Venetian demonstrated good cause for  
22 protection under NRCP 26(c) based upon a privacy issue. The Discovery Commissioner  
23 recommended "that all information within the redacted prior incident reports produced by Venetian  
24 are to be protected under an NRCP 26(c) order, not to be shared with anyone who is not directly  
25 affiliated with the litigation (*i.e.* counsel, counsel's staff, experts, etc.), and when attached as exhibits  
26 to any filings with the Court are to be provided under seal." The Discovery Commissioner further  
27  
28

1 recommended that “if Plaintiff identifies a specific prior incident report she feels is sufficiently related  
2 to her fall, with substantially similar facts and circumstances, occurring in the same location, that  
3 counsel will have an EDCR 2.34 conference to discuss the request and determine whether the identify  
4 of those involved in the specific prior incident should be provided before filing a motion.”

5 **B. Plaintiff’s Objection to DCRR of April 4, 2019**

6 Plaintiff filed an objection to the April 4, 2019 Discovery Commissioner's Report and  
7 Recommendation on April 16, 2019, which was heard by this Court on May 14, 2019. In a July 31,  
8 2019 order, this Court reversed the Discovery Commissioner’s Report and Recommendation of April  
9 4, 2019, finding there to be no legal basis for NRCP 26(c) protection of the prior incident reports.  
10 Venetian was therefore ordered to produce unredacted prior incident reports from November 4, 2013  
11 to November 4, 2016 to be used by Plaintiff without any restrictions related to the sharing of these  
12 documents outside the litigation. Venetian filed a motion for reconsideration on August 12, 2019,  
13 which was denied in a hearing held on September 17, 2019, followed by an order from this Court filed  
14 on October 11, 2019.

15 **C. Venetian’s First Writ of Mandamus and/or Writ of Prohibition, September 26, 2019**

16 Venetian filed a petition for writ of mandamus and/or writ of prohibition on September 26,  
17 2019 and motion to stay. The motion to stay was granted October 17, 2019 by the Nevada Court of  
18 Appeals in case no. 79689-COA.

19 **D. Plaintiff’s Motion to Compel, August 5, 2019 (Prior Incidents from 1999 to the Present)**

20 In the interim, on August 5, 2019, Plaintiff filed a Motion to Compel Testimony and  
21 Documents, which included the production of Venetian incident reports from 1999 to the present.  
22 Following a hearing on September 18, 2019, the Discovery Commissioner determined in a December  
23 2, 2019 Report and Recommendation that, based on the District Court’s July 31, 2019 order, Venetian  
24 must produce unredacted prior incident reports from November 4, 2011 to the present. Both Plaintiff  
25 and Venetian filed objections to the Discovery Commissioner’s December 2, 2019 Report and  
26

1 Recommendation on December 16, 2019. At a January 21, 2020 hearing, this Court ordered that  
2 Venetian must produce unredacted copies of reports for slip and fall incidents occurring within the  
3 Grand Lux rotunda dome area for the time period of November 4, 2011 to November 4, 2013, without  
4 requested NRCP 26(c) protection, consistent with its order of July 31, 2019.<sup>1</sup>

5 E. **Venetian's Second Writ of Mandamus and/or Writ of Prohibition, March 17, 2020**

6 On March 17, 2020, Venetian filed a second petition for writ relief and a stay was granted on  
7 March 27, 2020 in a case identified as 80816-COA.

8 F. **Court of Appeals Order, May 14, 2020**

9 On May 14, 2020, the Nevada Court of Appeals filed an opinion, *Venetian Casino Resort, LLC*,  
10 *supra*, granting Venetian's writ and remitting the issue to the District Court to conduct further  
11 proceedings consistent with its opinion. Specifically, the Court was instructed to address the issue of  
12 "good cause" under NRCP 26(c) and to consider the requirements of both relevance and  
13 proportionality within NRCP 26(b)(1) pertaining to Venetian's requested protection of private personal  
14 information of its guests identified in any prior incident reports to be produced from November 4, 2011  
15 to November 4, 2016.

16 G. **Plaintiff's Motion to Place on Calendar, April 30, 2021**

17 Plaintiff filed Plaintiff's Motion to Place on Calendar on April 30, 2021, presenting detailed  
18 briefing to address issues to be considered by the Court. Venetian filed a response and Plaintiff filed  
19 a reply. A hearing was held on June 1, 2021.

20 1. **Plaintiff's Position**

21 Plaintiff argued that Venetian has not established "good cause" for protection under NRCP  
22 26(c) and asserted that Plaintiff's need for unredacted Venetian prior incident reports from November  
23

---

24  
25  
26  
27 <sup>1</sup>The orders of July 31, 2019 and March 13, 2020 combined directed Venetian to produce unredacted  
28 prior incident reports occurring within the Grand Lux rotunda dome area from November 4, 2011 to  
November 4, 2016.

1 4, 2011 to November 4, 2016 meets the requirements of relevance and proportionality under NRCP  
2 26(b)(1), asserting that she believes her case has a multi-million dollar value (including a claim for  
3 punitive damages), that she needs the personal information of guests involved in prior incident reports  
4 to explore potentially relevant information about prior incidents and to rebut Venetian's affirmative  
5 defense of comparative fault. Plaintiff further argued that Venetian guests voluntarily provided their  
6 personal information in prior incident reports with no expectation of privacy.  
7

## 8 **2. Venetian's Position**

9 Venetian responded that it has met the "good cause" requirement of NRCP 26(c), noting that  
10 there is medical information in the prior incident reports which presents a "non-trivial privacy  
11 interest", as contemplated by *Clark Cty. Office of the Coroner v. Las Vegas Review-Journal*, 458 P.3d  
12 1048, 1058-59). Venetian further argued that Plaintiff's failure to defend its claimed right to distribute  
13 the prior incident reports outside this litigation (as she has previously done) is an admission that  
14 protection is warranted. Venetian also argued that the prior incident reports are not relevant based on  
15 *Eldorado Club, Inv. v. Graff*, 78 Nev. 507, 377 P.2d 174 (Nev. 1962), and that Plaintiff did not meet  
16 the proportionality requirement of NRCP 26(b)(1) as she has not established that her desire to have  
17 the personal contact information of Venetian guests unrelated to the subject litigation outweighs the  
18 privacy interests at issue.  
19

## 20 **FINDINGS AND CONCLUSIONS OF LAW**

21 Having reviewed the filings of the parties, heard oral argument, and considered this matter  
22 pursuant to *Venetian Casino Resort, LLC et al v. Eighth Judicial District Court et al*, 136 Nev. Adv.  
23 Rep. 26, 467 P.3d 1 (2020), the Court makes the following findings of fact and conclusions of law.  
24

### 25 **A. Venetian Has Established "Good Cause" For Limited Protection Under NRCP 26(c)**

26 The Court finds that Venetian has demonstrated "good cause" for a limited protective order  
27 under NRCP 26(c), as the prior incident reports at issue contain certain health information that should  
28 remain private. The Court further finds that certain other private information, such as Social Security

1 numbers, dates of birth and driver's license numbers, is also worthy of protection. However, the rest  
2 of the information within the subject prior incident reports, including the personal contact information  
3 of all Venetian guests identified, are not protected.

4 B. **Personal Contact Information of Venetian Guests Involved in Prior Incident Reports is**  
5 **Relevant Under NRCP 26(b)(1)**

6 The Court hereby finds that the contact information for Venetian guests involved in prior  
7 incidents is relevant. The Court rejects Venetian's argument that *Eldorado Club, Inv. v. Graff*, 78 Nev.  
8 507, 377 P.2d 174 (Nev. 1962), prohibits the production of prior incident reports. In making this  
9 determination, the Court emphasizes that it reserves all rulings of admissibility at trial related to the  
10 information at issue.

11 C. **Personal Contact Information of Venetian Guests Involved in Prior Incident Reports is**  
12 **Proportional to the Needs of the Case Under NRCP 26(b)(1)**

13 The Court hereby finds that the contact information for Venetian guests involved in prior  
14 incidents is proportional to the needs of the case pursuant to NRCP 26(b)(1). This is based on the  
15 following factors:

16 1. **The Importance of the Issues at Stake in the Action**

17 The Court finds that the issues of notice and foreseeability weigh in favor of Venetian's  
18 production of personal contact information of Venetian guests to Plaintiff. The Court further finds this  
19 information to be relevant to the Plaintiff's response to Venetian's comparative negligence affirmative  
20 defense.  
21

22 2. **The Amount in Controversy**

23 Plaintiff is asserting to have sustained injuries to her brain and spine, with past medical  
24 expenses exceeding \$114,000 and alleged future medical expenses to be in excess of \$450,000, with  
25 a yet undetermined wage loss and loss of earning capacity. Plaintiff also asserts losses associated with  
26 pain and suffering, and presently has a claim for punitive damages. The amount in controversy weighs  
27  
28 in favor of producing the personal contact information of Venetian guests involved in prior incidents.

1           3.     **The Parties' Relative Access to Relevant Information**

2           Venetian is presently in sole control of the personal guest contact information Plaintiff is  
3 seeking. This factor weighs in favor of producing this information to Plaintiff.

4           4.     **The Parties' Resources**

5           The Venetian has substantial resources and can produce the private guest information requested  
6 by Plaintiff with minimal time and effort. This factor weighs in favor of disclosure.

7           5.     **The Importance of the Discovery in Resolving the Issues**

8           The Court finds that providing the personal contact information of guests involved in prior  
9 incidents at the Venetian will help resolve issues related to notice, foreseeability and whether Plaintiff  
10 was comparatively at fault. This factor weighs in favor of disclosure.

11           6.     **Whether the Burden or Expense of the Proposed Discovery Outweighs its Likely  
12 Benefit**

13           The Court finds that the benefit of providing Plaintiff with prior incident reports revealing the  
14 personal contact information of Venetian guests outweighs any burden associated with Venetian's  
15 production in light of the factors discussed herein above. This factor weighs in favor of disclosure.

16           D.     **Issue of Venetian's Production of Redacted Prior Incident Reports from November 4,  
17 2013 to November 4, 2016**

18           Venetian raised a concern that the previously provided prior redacted incident reports were  
19 shared by Plaintiff with others outside the litigation when its initial motion for protection was filed and  
20 thereafter granted by the Discovery Commissioner in her report and recommendation. Venetian  
21 argued that these reports have been published by attorneys in litigation unrelated to this matter with  
22 unredacted health information. Venetian asserted that compliance with this order will have the same  
23 effect as producing the reports from November 4, 2013 to November 4, 2016 without redactions. The  
24 Court previously determined in its order of July 31, 2019 that Plaintiff had a right to distribute the  
25 prior incident reports and therefore makes no ruling herein to address that issue, but recommends that  
26 counsel confer on how to resolve it.  
27  
28

**ORDER**

Based on the foregoing, this Court, having fully considered the matter and good cause appearing,

**IT IS HEREBY ORDERED** that the Court's orders of July 31, 2019 and March 13, 2020 are hereby modified as follows: Venetian shall produce prior incident reports of slip and fall events occurring within the Grand Lux rotunda dome area of the Venetian property from November 4, 2011 to November 4, 2016, redacting only the private health information of Venetian guests contained therein, as well as dates of birth, Social Security numbers and driver's license numbers. All other information is to remain without redactions.

**IT IS FURTHER HEREBY ORDERED** that Plaintiff is not restricted from sharing Venetian personal guest information with others outside the litigation, as previously determined and ordered by the Court.

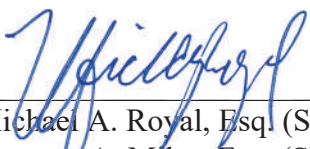
**IT IS FURTHER HEREBY ORDERED** that Venetian's motion for a 30 day stay of proceedings from the date this order is filed with the Court to file a petition for writ of mandamus and/or prohibition is GRANTED.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

\_\_\_\_\_  
DISTRICT COURT JUDGE

Submitted by:

**ROYAL & MILES LLP**

  
\_\_\_\_\_  
Michael A. Royal, Esq. (SBN 4370)  
Gregory A. Miles, Esq. (SBN 4336)  
1522 W. Warm Springs Road  
Henderson, NV 89014  
*Attorneys for Defendants*

Reviewed by:

**CLAGGETT & SYKES LAW FIRM**

\_\_\_\_\_  
Sean K. Claggett, Esq. (SBN: 8407)  
William T. Sykes, Esq. (SBN: 9916)  
Geordan G. Logan, Esq. (SBN: 13910)  
4101 Meadows Lane, Suite 100  
Las Vegas, Nevada 89107  
*Attorneys for Plaintiff*



1 Reviewed by:

2 **HOOKS MENG & CLEMENT**

3  
4 

---

Dalton L. Hooks, Jr., Esq. (SBN: 8121)  
5 Sami Randolph, Esq. (SBN: 7876)  
2820 W. Charleston Blvd., Suite C-23  
6 Las Vegas, NV 89102  
7 *Attorneys for Third-Party Defendant BRAND*  
8 *VEGAS, LLC*  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDR**

Sean K. Claggett, Esq.  
Nevada Bar No. 008407  
William T. Sykes, Esq.  
Nevada Bar No. 009916  
Geordan G. Logan, Esq.  
Nevada Bar No. 013910  
CLAGGETT & SYKES LAW FIRM  
4101 Meadows Lane, Suite 100  
Las Vegas, Nevada 89107  
(702) 655-2346 – Telephone  
(702) 655-3763 – Facsimile

Keith E. Galliher, Jr., Esq.  
Nevada Bar No. 220  
Jeffrey L. Galliher, Esq.  
Nevada Bar No. 8078  
Kathleen H. Gallagher, Esq.  
Nevada Bar No. 15043  
THE GALLIHER LAW FIRM  
1850 East Sahara Avenue, Suite 107  
Las Vegas, Nevada 89104  
(702) 735-0049 – Telephone  
(702) 735-0204 – Facsimile  
*Attorneys for Plaintiff*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

JOYCE SEKERA, an Individual,  
  
Plaintiff,

v.

VENETIAN CASINO RESORT, LLC,  
d/b/a THE VENETIAN LAS VEGAS, a  
Nevada Limited Liability Company;  
LAS VEGAS SANDS, LLC d/b/a THE  
VENETIAN LAS VEGAS, a Nevada  
Limited Liability Company; YET  
UNKNOWN EMPLOYEE; DOES I  
through X, inclusive,

Defendants.

Case No.: A-18-772761-C

Dept. No. XXV

**ORDER OF CLARIFICATION  
FROM JUNE 1, 2021,  
HEARING**

1  
2 VENETIAN CASINO RESORT, LLC,  
3 d/b/a THE VENETIAN LAS VEGAS, a  
4 Nevada Limited Liability Company;  
5 LAS VEGAS SANDS, LLC d/b/a THE  
6 VENETIAN LAS VEGAS, a Nevada  
7 Limited Liability Company,

8 Third-Party Plaintiffs,

9 v.

10 BRAND VEGAS, LLC, a Nevada  
11 Limited Liability Company; DOES 1-  
12 10; ROE BUSINESS ENTITIES 1-10,  
13 inclusive,

14 Third-Party Defendants.

15 Plaintiff Joyce Sekera, by and through her counsel of record, Claggett &  
16 Sykes Law Firm, filed her Motion to Place on Calendar on April 30, 2021,  
17 requesting that the Court clarify its orders of July 31, 2019, and March 13,  
18 2020, regarding Defendants' production of prior incident reports in light of the  
19 Nevada Court of Appeals' decision in *Venetian Casino Resort, LLC et al. v.*  
20 *Eighth Judicial Dist. Court*, 136 Nev. Adv. Rep. 26, 467 P.3d 1 (2020). On May  
21 14, 2021, Defendants Venetian Casino Resort, LLC, d/b/a The Venetian Las  
22 Vegas and Las Vegas Sands, LLC d/b/a The Venetian Las Vegas (hereinafter  
23 collectively referred to as "Venetian"), by and through their counsel of record,  
24 Royal & Miles LLP, filed their Opposition. On May 25, 2021, Plaintiff filed her  
Reply.

1 The matter came before the Court for hearing at 9:00 a.m. on June 1,  
2 2021, with Geordan G. Logan, Esq., of Claggett & Sykes Law Firm appearing on  
3 behalf of Plaintiff, Michael A. Royal, Esq., of Royal & Miles LLP, appearing on  
4 behalf of Venetian, and Sami N. Randolph, Esq., of Hooks Meng & Clement,  
5 appearing on behalf of Third-Party Defendant, Brand Vegas, LLC.

6 **BACKGROUND**

7 This is a personal injury case arising out of a slip and fall at the Venetian  
8 Casino Resort on November 4, 2016. On that day, Joyce slipped on the marble  
9 floor near the Grand Lux Café restrooms in the Venetian Casino Resort and, as  
10 a result, suffered injuries.

11 On August 15, 2018, Plaintiff requested, “True and correct copies of any  
12 and all claim forms, legal actions, civil complaints, statements, security reports,  
13 computer generated lists, investigative documents or other memoranda which  
14 have, as its subject matter, slip and fall cases occurring on marble floors within  
15 the subject VENETIAN CASINO RESORT within three years prior to the  
16 incident described in Plaintiff’s Complaint, to the present.” Venetian responded  
17 by producing prior incident reports from November 4, 2013, to November 4,  
18 2016. The incident reports were redacted to prevent disclosure of the slip and  
19 fall victims’ names and contact information. When Plaintiff requested that the  
20 redactions be removed, Venetian filed a motion for protective order with the  
21 Discovery Commissioner. On April 4, 2019, the Discovery Commissioner served  
22 her Report and Recommendations wherein she recommended that Venetian’s  
23 motion be granted.

1 Plaintiff objected to the Discovery Commissioner's Report and  
2 Recommendations and on July 31, 2019, the Court reversed the Discovery  
3 Commissioner's recommendations holding "there is no legal basis to preclude  
4 Plaintiff from knowing the identity of the individuals contained in the incident  
5 reports as this information is relevant discovery." Accordingly, Venetian was  
6 ordered to produce unredacted prior incident reports from November 4, 2013, to  
7 November 4, 2016. On September 26, 2019, Venetian filed a writ petition  
8 challenging the Court's July 31, 2019, Order.

9 On August 5, 2019, Plaintiff filed a Motion to Compel Testimony and  
10 Documents wherein she sought the production of unredacted prior incident  
11 reports, as well as previously requested subsequent incident reports. On July  
12 12, 2019, the Venetian opposed Plaintiff's motion to compel and filed a  
13 countermotion for a protective order. The Discovery Commissioner heard  
14 arguments regarding Plaintiff's motion to compel and recommended that  
15 Defendant produce unredacted incident reports from November 4, 2013,  
16 through the date of production. Both parties objected to the Discovery  
17 Commissioner's December 2, 2019, Report and Recommendation.

18 On March 13, 2020, the Court ordered that Venetian "must produce prior  
19 incident reports limited to the Grand Lux rotunda dome area from November 4,  
20 2011 to November 4, 2016." The Court otherwise adopted the DCRR, "including  
21 the order requiring that Venetian produce reports of prior incidents in  
22 unredacted form without requested NRCP 26(c) protection." On March 17, 2020,  
23 Venetian filed a second writ petition.

On May 14, 2020, the Nevada Court of Appeals issued its published opinion granting Defendants' first petition. Further, the Nevada Court of Appeals stated:

The district court shall conduct further proceedings consistent with this opinion to determine whether disclosure of the unredacted reports is relevant and proportional under NRCP 26(b)(1). If disclosure is proper, the district court must conduct a good-cause analysis under NRCP 26(c)(1), applying the framework provided herein to determine whether the Venetian has shown good cause for a protective order. If the Venetian demonstrates good cause, the district court may issue a protective order as dictated by the circumstances of this case

Subsequently, the Clerk issued a Writ of Mandamus instructing the Court to, "vacate your order denying the Venetian's motion for a protective order and to conduct further proceedings consistent with the court's opinion[.]"

Then, on June 19, 2020, the Nevada Court of Appeals issued its Order Granting Petition for Writ of Mandamus instructing the Court to vacate its March 13, 2020, Order and conduct proceedings consistent with its order and prior decision. Thereafter, the Clerk issued a Writ of Mandamus.

On April 30, 2021, Plaintiff filed her Motion to Place on Calendar requesting that the Court reconsider its previous orders regarding Venetian's prior incident reports in light of the Nevada Court of Appeals' decision and orders. On May 14, 2021, Venetian filed its Opposition and on May 25, 2021, Plaintiff filed her Reply. The matter was heard on June 1, 2021.

///

///

///

## FINDINGS AND CONCLUSIONS OF LAW

NRCP 26(b)(1), in relevant part, states:

Parties may obtain discovery regarding any nonprivileged matter that is relevant to any party's claims or defenses and proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit. Information within this scope of discovery need not be admissible in evidence to be discoverable.

NRCP 26(b)(1).

Discovery sought must be both relevant and proportional to the needs of the case. *See Venetian Casino Resort, LLC v. Eighth Judicial Dist. Ct.*, 467 P.3d 1, 5 (Nev. App., May 14, 2020) (citing *In re Bard IVC Filters Prods. Liab. Litig.*, 317 F.R.D. 562, 564 (D. Ari. 2016) ("Relevancy alone is no longer sufficient – discovery must also be proportional to the needs of the case"); *Samsung Elecs. Am., Inc. v. Yang Kun Chung*, 321 F.R.D. 250, 279 (N.D. Tex. 2017) ("[D]iscoverable matter must be both relevant and proportional to the needs of the case – which are related but distinct requirements.")).

### **A. The Incident Reports and Witness Contact Information are Relevant to the Claims and Defenses in this Case**

Relevant evidence is, "evidence having any tendency to make the existence of any fact that is of consequence to the determination of the action more or less probable than it would be without the evidence." NRS 48.015.

1 Venetian's incident reports, as well as the names and contact information  
2 of the slip and fall victims, are relevant to the claims and defenses in this case.  
3 First, the incident reports, and the information contained therein, are relevant  
4 to show notice and foreseeability of any unsafe or dangerous condition.  
5 Similarly, the incident reports are relevant to Plaintiff's claim for punitive  
6 damages. Next, the incident reports are relevant to Venetian's affirmative  
7 defense of comparative negligence. Finally, as to the redacted contact  
8 information for injured guests, that information is relevant as well, as those  
9 individuals are witnesses who have information regarding: (1) the facts and  
10 circumstances surrounding their slip and fall; and (2) the condition of  
11 Venetian's flooring at the time and location of their slip and fall.

12 **B. The Incident Reports and Witness Contact Information are**  
13 **Proportional to the Needs of the Case.**

14 NRCP 26(b)(1) provides several factors for courts to consider regarding  
15 proportionality: (1) the importance of the issues at stake in the action; (2) the  
16 amount in controversy; (3) the parties' relative access to relevant information;  
17 (4) the parties' resources; (5) the importance of the discovery in resolving the  
18 issues; and (6) whether the burden or expense of the proposed discovery  
19 outweighs its likely benefit.

20 The incident reports and witness contact information are proportional to  
21 the needs of the case as these factors all weigh in favor of Plaintiff.

22 **1. The Importance of the Issues at Stake in the Action**

23 The issues at stake in this action are important. Specifically, issues of  
24 notice, foreseeability, and whether Plaintiff was comparatively negligent are



1 important to the claims and defenses in this case. The incident reports,  
2 including the redacted witness contact information, are relevant to those issues.  
3 This factor weighs in favor of disclosure.

4 **2. The Amount in Controversy**

5 To date, Plaintiff is claiming spinal and brain injuries, including, but not  
6 limited to: (1) \$114,009.27 in past medical specials; (2) \$457,936.99 in future  
7 medical expenses; (3) undetermined wage loss and loss of earning capacity; (4)  
8 past and future pain, suffering, mental anguish, and loss of enjoyment of life; (5)  
9 attorney's fees and costs; and (6) punitive damages. Thus, the amount in  
10 controversy is substantial and weighs in favor of disclosure. *See, e.g., Guerrero*  
11 *v. Wharton*, 2017 U.S. Dist. LEXIS 225185, at \*10 – \*11 (D. Nev. Mar. 30, 2017)  
12 (“Plaintiff’s claim is not limited to past medical expenses, and she is instead  
13 suing to recover for past medical expenses, future medical expenses, lost wages,  
14 pain and suffering, and emotional distress, as well as punitive damages.... Not  
15 including emotional damages and punitive damages, Plaintiff estimates these  
16 damages at approximately \$242,675.94.... Including the possibility of a jury  
17 award of emotional damages and punitive damages, the amount in controversy  
18 would be much higher than that amount. Especially given the limited burden on  
19 Defendant in complying with these discovery requests, the amount in  
20 controversy tilts in favor of discoverability, not against it”); *Schultz v. Sentinel*  
21 *Ins. Co.*, 2016 U.S. Dist. LEXIS 72542, at \*19 - \*20 (D.S.D. June 3, 2016) (“The  
22 court applies the proportionality requirement built into Rule 26, but rejects  
23 Sentinel’s characterization of the value of Ms. Schultz’s case as a \$17,000 case  
24

1 that benefits her alone.... If punitive damages are awarded, Ms. Schultz has the  
2 potential to affect Sentinel's alleged business practices and to remedy the  
3 situation for many insureds, not just herself").

### 4 **3. The Parties' Relative Access to Relevant Information**

5 The information sought is solely in Venetian's control. The Venetian  
6 maintains the records, and Plaintiff has no other means of obtaining the  
7 information contained on the incident reports, including witness contact  
8 information. This factor weighs in favor of disclosure. *See, e.g., Labrier v. State*  
9 *Farm Fire & Cas. Co.*, 314 F.R.D. 637, 643 (W.D. Mo. May 9, 2016) ("LaBrier  
10 does not have access to the information she seeks, other than through the  
11 discovery, as it is in State Farm's own database and the database of its vendor,  
12 Xactware. In terms of resources, LaBrier is an individual, while State Farm is a  
13 corporation with a national presence, with sophisticated access to data").

### 14 **4. The Parties' Resources**

15 Venetian has substantial resources. Further, the act of un-redacting the  
16 incident reports would involve minimal time, effort, or resources. This factor  
17 weighs in favor of disclosure.

### 18 **5. The Importance of the Discovery in Resolving the Issues**

19 The incident reports and witness contact information are relevant to  
20 issues of notice, foreseeability, whether Plaintiff is comparatively at-fault, and  
21 Plaintiff's claim for punitive damages. This factor weighs in favor of disclosure.  
22  
23  
24

1           **6.     Whether the Burden or Expense of the Proposed Discovery**  
2           **Outweighs its Likely Benefit**

3           The likely benefit of the incident reports and witness contact information  
4 outweighs any burden given: (1) the information's relevance to the claims and  
5 defenses in this case; (2) the substantial amount in controversy; and (3) the fact  
6 that Venetian is in sole possession of the requested information and Plaintiff  
7 has no alternative means of acquiring the same. Further, the Venetian has  
8 already produced redacted reports, so the primary burden is producing un-  
9 redacted reports consistent with this order. This burden is nominal.

10          This factor weighs in favor of disclosure.

11           **C.     Venetian Has Demonstrated Good Cause for a Limited Protective**  
12           **Order Within NRCP 26(c)**

13          NRCP 26(c)(1) provides the standard for protective orders, stating that,  
14 “[t]he court may, for good cause, issue an order to protect a party or person from  
15 annoyance, embarrassment, oppression, or undue burden or expense....”

16          In *Venetian Casino Resort, LLC v. Eighth Judicial Dist. Ct.*, 467 P.3d 1  
17 (Nev. App., May 14, 2020), the Nevada Court of Appeals adopted a three-part  
18 test for conducting a good cause analysis under NRCP 26(c)(1).

19          “First, the district court must determine if particularized harm would  
20 occur due to public disclosure of the information.” *Venetian Casino Resort, LLC*  
21 *v. Eighth Judicial Dist. Ct.*, 467 P.3d 1, 10 (Nev. App., May 14, 2020) (citing *In*  
22 *re Roman Catholic Archbishop of Portland in Or.*, 661 F.3d 417, 424 (9th Cir.  
23 2011) (“As we have explained, ‘[b]road allegations of harm, unsubstantiated by  
24 specific examples or articulated reasoning, do not satisfy the Rule 26(c) test”).

1 “Second, if the district court concludes that particularized harm would  
2 result, then it must ‘balance the public and private interests to decide whether  
3 ... a protective order is necessary.’” *Id.* (citing *Roman Catholic*, 661 F.3d at 424).  
4 In order to balance private and public interests, the Nevada Court of Appeals  
5 directed courts to the following list of factors set forth in *Glenmede Trust Co. v.*  
6 *Thompson*, 56 F.3d 476, 483 (3d Cir. 1995):

7 (1) whether disclosure will violate any privacy interests; (2)  
8 whether the information is being sought for a legitimate purpose  
9 or for an improper purpose; (3) whether disclosure of the  
10 information will cause a party embarrassment; (4) whether  
11 confidentiality is being sought over information important to  
12 public health or safety; (5) whether the sharing of information  
among litigants will promote fairness and efficiency; (6) whether  
a party benefitting from the order of confidentiality is a public  
entity or official; and (7) whether the case involves issues  
important to the public.

13 *Id.* at 10-11 (quoting *Glenmede Trust Co. v. Thompson*, 56 F.3d 476, 483 (3d Cir.  
14 1995)).

15 “Third, even if the factors balance in favor of protecting the discovery  
16 material, ‘a court must still consider whether redacting portions of the discovery  
17 material will nevertheless allow disclosure.’” *Id.* at 11 (quoting *Roman Catholic*,  
18 661 F.3d at 425).

19 In applying the three-part test adopted in *Venetian Casino Resort, LLC v.*  
20 *Eighth Judicial Dist. Ct.*, 467 P.3d 1 (Nev. App., May 14, 2020), the Court finds  
21 that Venetian has demonstrated good cause for a limited protective order under  
22 NRCP 26(c). Specifically, the Court finds that the following private information  
23 should be redacted from any incident reports produced by Venetian: (1) Social  
24

1 Security numbers; (2) dates of birth; (3) driver's license numbers; and (4) certain  
2 private health information, such as that provided to responding EMT's.

3 The Court also finds that the remaining information contained in the  
4 incident reports, including names and contact information for the slip and fall  
5 victims, details regarding the facts and circumstances of the particular  
6 incidents, and any self-reported injuries resulting from the incident should be  
7 produced and disclosed as there is no expectation of privacy in this information  
8 and it was voluntarily disclosed by these individuals to a third party, the  
9 Venetian.

10 **ORDER**

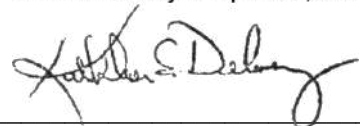
11 Based on the foregoing, this Court, having fully considered the matter  
12 and good cause appearing,

13 **IT IS HEREBY ORDERED** that the Court's orders of July 31, 2019, and  
14 March 13, 2019, are modified as follows: Venetian shall produce prior incident  
15 reports for slip and fall events occurring within the Grand Lux rotunda dome  
16 area from November 4, 2011, to November 4, 2016, redacting only Social  
17 Security numbers, dates of birth, driver's license numbers, and private health  
18 information, such as that provided to responding EMT's. All other information,  
19 including but not limited to names and contact information, the facts and  
20 circumstances of the particular incidents, whether an ambulance was called to  
21 the scene, whether the individual was transported from the scene to a hospital,  
22 injuries observed or noted by Venetian's employees, and any self-reported  
23 injuries resulting from the incident shall be produced without redactions.

1           **IT IS HEREBY FURTHER ORDERED** that Venetian's motion for a  
2 stay of proceedings for thirty (30) days is GRANTED.

3           DATED this \_\_\_\_\_ day of June, 2021.

Dated this 7th day of September, 2021



DISTRICT COURT JUDGE

048 168 D58F 6A3A  
Kathleen E. Delaney  
District Court Judge

7           *Submitted by:*

*Reviewed by:*

8           DATED this 25th day of June, 2021.

DATED this \_\_\_\_ day of June, 2021

9           CLAGGETT & SYKES LAW FIRM

ROYAL & MILES LLP

10          /s/ William T. Sykes

Submitting Competing Order

11          Sean K. Claggett, Esq.  
12          Nevada Bar No. 008407  
13          William T. Sykes, Esq.  
14          Nevada Bar No. 009916  
15          Geordan G. Logan, Esq.  
16          Nevada Bar No. 013910  
17          4101 Meadows Lane, Suite 100  
18          Las Vegas, Nevada 89107  
19          Attorneys for Plaintiff

Michael A. Royal, Esq.  
Nevada Bar No. 004370  
Gregory A. Miles, Esq.  
Nevada Bar No. 004336  
1522 W. Warm Springs Road  
Henderson, NV 89014  
Attorneys for Defendants

16          *Reviewed by:*

17          DATED this \_\_\_\_ day of June, 2021

18          HOOKS MENG & CLEMENT

19          No Response

20          Dalton L. Hooks, Jr., Esq.  
21          Nevada Bar No. 008121  
22          Sami Randolph, Esq.  
23          Nevada Bar No. 007876  
24          2820 W. Charleston Blvd., Suite C-23  
Las Vegas, NV 89102  
Attorneys for Third-Party Defendants

1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Joyce Sekera, Plaintiff(s)

CASE NO: A-18-772761-C

7 vs.

DEPT. NO. Department 25

8 Venetian Casino Resort LLC,  
9 Defendant(s)

10  
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District  
13 Court. The foregoing Order was served via the court's electronic eFile system to all  
14 recipients registered for e-Service on the above entitled case as listed below:

Service Date: 9/7/2021

15 Michael Royal

mroyal@royalmileslaw.com

16 Jackie Abrego

jabrego@claggettlaw.com

17 Maria Alvarez

malvarez@claggettlaw.com

18 Reception E-File

reception@claggettlaw.com

19 Deena Mooney

dmooney@galliherlawfirm.com

20 Keith Galliher, Jr.

kgalliher@galliherlawfirm.com

21 Maralea Royal

maralea@royalmileslaw.com

22 Matthew Granda

mgranda@claggettlaw.com

23 William Sykes

wsykes@claggettlaw.com

24 Jennifer Morales

jmorales@claggettlaw.com

25 Sean Claggett

sclaggett@claggettlaw.com

1	Moises Garcia	mgarcia@claggettlaw.com
2	Ashley Schmitt	aschmitt@royalmileslaw.com
3	Stefania Ross	SRoss@TysonMendes.com
4	Gina Ramos	gramos@galliherlawfirm.com
5	Esmeralda Wesinstein	eweinstein@hmc.law
6	Terry Rodriguez	trodriguez@hmc.law
7	Thomas McGrath	tmcgrath@tysonmendes.com
8	Scarlett Fisher	sfisher@tysonmendes.com
9	Cheryl Wilson	cwilson@tysonmendes.com
10	Geordan Logan	glogan@claggettlaw.com
11	Russell Christian	rchristian@tysonmendes.com
12	sami Randolph	srandolph@hmc.law
13	Gabrielle Carvalho	gabrielle@claggettlaw.com
14	Brian Blankenship	brian@claggettlaw.com
15	Scott Lundy	scott@claggettlaw.com
16	Stefanie Stromwall	sstromwall@galliherlawfirm.com
17	Deyna Soltero	dsoltero@galliherlawfirm.com
18	Joanne Montebon	joanne@claggettlaw.com
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		