

IN THE SUPREME COURT OF THE STATE OF NEVADA

ROWEN A. SEIBEL; MOTI
PARTNERS, LLC; MOTI
PARTNERS 16, LLC; LLTQ
ENTERPRISES, LLC; LLTQ
ENTERPRISES 16, LLC; TPOV
ENTERPRISES, LLC; TPOV 16
ENTERPRISES, LLC; FERG, LLC;
GERG16, LLC; R SQUARED
GLOBAL SOLUTIONS, LLC; DNT
ACQUISITION, LLC; GR BURGR,
LLC; AND CRAIG GREEN,

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF
NEVADA, IN AND FOR THE
COUNTY OF CLARK; AND THE
HONORABLE TIMOTHY C.
WILLIAMS, DISTRICT JUDGE,

Respondents,

and

DESERT PALACE, INC.; PARIS LAS
VEGAS OPERATING COMPANY,
LLC; PHWLTV, LLC; AND
BOARDWALK REGENCY
CORPORATION,

Real Parties in Interest

Case No. 83723

Electronically Filed

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Elizabeth A. Brown

Clerk of the Supreme Court

**MOTION TO REDACT REAL
PARTIES IN INTEREST
RESPONSE TO PETITIONERS'
MOTION TO SUBMIT
PRIVILEGED DOCUMENTS
UNDER SEAL FOR AN *IN*
CAMERA REVIEW BY THIS
COURT AND COUNTERMOTION
TO STRIKE FOOTNOTE 2 AND
PAGES 20-22 OF PETITIONER'S
REPLY BRIEF**

I. INTRODUCTION

Pursuant to Part VII of the Supreme Court Rules Governing Sealing and Redacting Court Records, Real Parties in Interest Real Parties in Interest, Desert Palace, Inc., Paris Las Vegas Operating Company, LLC, PHWLTV, LLC and Boardwalk Regency Corporation (collectively "Real Parties in Interest"), hereby move this Court for an order to redact portions of their Response to Petitioners' Motion to Submit Privileged Documents Under Seal for an *In Camera* Review and

Counter-motion to Strike Footnote 2 and Pages 20-22 of Petitioners' Reply Brief. ("Response") under seal. Portions of the Response quote information that was filed under seal in the district court pursuant to the Real Parties in Interest and Petitioners Rowen Seibel, MOTI Partners, LLC, MOTI Partners 16, LLC, LLTQ Enterprises, LLC, LLTQ Enterprises 16, LLC, TPOV Enterprises, LLC, TPOV Enterprises 16, LLC, FERG, LLC, FERG 16, LLC, R Squared Global Solutions LLC, Derivatively on Behalf of DNT Acquisition, and Craig Green (collectively "Petitioners") motions to seal and redact. The Court should allow the Real Parties in Interest to protect this same information by filing the Response with redactions.

II. ANALYSIS

Rule 7 of Part VII of the Supreme Court Rules provides that sealed District Court records shall be made available to this Court on appeal, but that those records "shall be sealed from public access" subject to further order of this Court. This Court will keep the documents under seal if there is an appropriate basis to do so under SRCR 3(4). SRCR 3(4) permits the sealing or redaction of the record when justified by compelling privacy or safety interests that outweigh the public interest in access to the court record. The public interest in privacy outweighs the public interest in open court records when the sealing or redaction furthers a protective order entered under NRCP 26(c). SRCR 3(4)(b).

The district court entered a Stipulated Confidentiality Agreement and Protective Order on March 12, 2019 (the "Protective Order"). The Protective Order allowed the parties to designate certain information as Confidential or Highly Confidential to further limit the disclosure of information. The district court has granted the parties' motions to redact certain briefing and file certain exhibits thereto under seal. Specifically, the Response quotes information that was filed under seal as part of the Petitioners' Appendix. The Court should allow the parties' to maintain the confidentiality of the documents by allowing the Real Parties in Interest to redact portions of the Response that quote information designated as Confidential by Petitioners.

III. CONCLUSION

Based upon the foregoing, the Real Parties in Interest respectfully request that

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the Court permit it to file its Response with redactions.

DATED this 9th day of March 2022.

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Regency Corporation*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of PISANELLI BICE PLLC and that, on this 9th day of March 2022, I electronically filed and served a true and correct copy of the above and foregoing **MOTION TO REDACT REAL PARTIES IN INTERESTS' RESPONSE TO PETITIONER'S MOTION TO SUBMIT PRIVILEGED DOCUMENTS UNDER SEAL FOR AN IN CAMERA REVIEW BY THIS COURT AND COUNTERMOTION TO STRIKE FOOTNOTE TO AND PAGES 20-22 OF PETITIONER'S REPLY BRIEF** properly addressed to the following:

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