## IN THE SUPREME COURT OF THE STATE OF NEVADA

ASPEN SPECIALTY INSURANCE COMPANY,

Petitioner,

v.

THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK; and THE HONORABLE GLORIA STURMAN, DISTRICT JUDGE, DEPT. 26,

Respondents,

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

Real Parties in Interest.

Electronically Filed
Nov 17 2021 01:39 p.m.
Supreme Court CEND Weth A. Brown
Clerk of Supreme Court
Related to Nevada Supreme Court
Case No. 81344

District Court Case No. A-17-758902-C

MOTION TO FILE UNDER SEAL UNREDACTED FIRST AMENDED COMPLAINT

Michael M. Edwards, Esq., NBN 6281 Derek Noack, Esq., NBN 15074 Stephanie D. Bedker, Esq., NBN 14169

MESSNER REEVES LLP

8945 W. Russell Road, Suite 300 Las Vegas, Nevada 89148

Telephone: (702) 363-5100 Facsimile: (702) 363-5101

Attorneys for Petitioner
Aspen Specialty Insurance Company

Petitioner Aspen Specialty Insurance Company ("Petitioner") asks this Court for an order sealing the unredacted First Amended Complaint, as included in Petitioner's Appendix. SRCR 3(1).

Petitioner's Appendix contains an unredacted copy of the First Amended Complaint. The First Amended Complaint includes certain terms of a confidential settlement agreement reached between the parties in *Moradi v. Nevada Property 1*, *LLC dba The Cosmopolitan, et al.*, District Court Clark County, Nevada, Case No. A-14-698824-C. As such, it was sealed in the District Court in this case.

Under SRCR 3(4)(e), this Court may seal records pertaining to the confidential terms of a settlement agreement. In light of the confidential nature of the settlement agreement, Petitioner asks that this Court seal the unredacted First Amended Complaint.

DATED this 16<sup>th</sup> day of November, 2021.

## MESSNER REEVES LLP

Michael M. Edwards East NIDN (2)

Michael M. Edwards, Esq., NBN 6281 Derek Noack, Esq., NBN 15074

Stephanie Bedker, Esq., NBN 14169

8945 W. Russell Road, Suite 300

Las Vegas, NV 89148

Telephone: (702) 363-5100

Facsimile: (702) 363-5101

Attorneys for Petitioner

Aspen Specialty Insurance Company

## **CERTIFICATE OF SERVICE**

Pursuant to NRAP 25, I certify that I am an employee of Messner Reeves LLP, that in accordance therewith, I caused a copy of MOTION TO FILE UNDER SEAL UNREDACTED FIRST AMENDED COMPLAINT to be served on the Real Parties in Interest via the Supreme Court's e-filing system on this 16th day of November, 2021, and upon:

The Honorable GLORIA STURMAN
Eighth Judicial District Court, Dept. 26
Clark County, Nevada
Regional Justice Center
200 Lewis Ave.
Las Vegas, Nevada 89155

Michael K. Wall
HUTCHINSON & STEFFIN
10080 West Alta Drive, Suite 200
Las Vegas, NV 89145
T: (702) 385-2500
mwall@hutchlegal.com
Attorneys for Real Party in Interest
St. Paul Fire & Marine
Insurance Company

Andrew D. Herold, Esq.
Nicholas B. Salerno, Esq.
HEROLD & SAGER
3960 Howard Hughes Parkway,
Suite 500
Las Vegas, NV 89169
Tel: (702) 990-3624
Fax: (702) 990-3835
aherold@heroldsagerlaw.com
nsalerno@heroldsagerlaw.com

Jeremy W. Stamelman, Esq.
KELLER/ANDERLE LLP
18300 Von Karmen Avenue, Suite 930
Irvine, CA 92612-1057
Tel: (949) 476-8700
Fax: (949) 476-0900
Attorneys for Real Parties in Interest
National Union Fire Insurance Company of
Pittsburgh PA & Roof Deck Entertainment,
LLC d/b/a Marquee Nightclub

Employee of MESSNER REEVES LLP