## IN THE SUPREME COURT OF THE STATE OF

DEC 14 2021

ASPEN SPECIALTY INSURANCE COMPANY,

Petitioner,

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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.

Supreme Court Case No. 83794

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

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21-35623

Petitioner Aspen Specialty Insurance Company ("Petitioner") asks this Court for an order sealing the unredacted First Amended Complaint, attached hereto as **Exhibit**A, 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 13th day of December, 2021.

## MESSNER REEVES LLP

/s/ Michael M. Edwards

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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 13th day of December, 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

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/s/Laurie Moreno
Employee of MESSNER REEVES LLP