

IN THE SUPREME COURT OF THE STATE OF NEVADA

Supreme Court Case No. 85804

Electronically Filed
May 01 2023 06:32 PM
Elizabeth A. Brown
Clerk of Supreme Court

STEVE WYNN,

Appellant,

v.

THE ASSOCIATED PRESS; REGINA GARCIA CANO

Respondents.

**STEVE WYNN'S MOTION TO REDACT OPENING BRIEF AND
SEAL CONFIDENTIAL VOLUMES OF THE APPELLANT'S
APPENDIX THERETO**

On appeal from the Eighth Judicial District Court, Clark County
The Honorable Ronald J. Israel, Department XXVIII
District Court Case No. A-18-772715-C

Todd L. Bice, Esq., Bar No. 4534
Jordan T. Smith, Esq., Bar No. 12097
Emily A. Buchwald, Esq., Bar No. 13442
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Attorneys for Appellant Steve Wynn

Pursuant to NRAP 27 and Rule 3(1) of the Supreme Court Rules on Sealing and Redacting Court Records ("SRCR"), Appellant Steve Wynn ("Wynn") moves this Court for an order (1) permitting Wynn to redact portions of his Opening Brief, which is being filed concurrently herewith, and (2) to allow Wynn to file Volume 4 of the Joint Appendix under seal. This Motion is made and based on the record included in the Joint Appendix, the SRCR, and the attached Memorandum of Points and Authorities.

DATED this 1st day of May, 2023.

PISANELLI BICE PLLC

By: /s/ Todd L. Bice
Todd L. Bice, Esq., #4534
Jordan T. Smith, Esq., #12097
Emily A. Buchwald, Esq., #13442
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400 South 7th Street. Suite 300
Las Vegas, Nevada 89101

Attorneys for Appellant Steve Wynn

MEMORANDUM OF POINTS AND AUTHORITIES

Under SRCR 3(1), "[a]ny person may request that the court seal or redact court records . . . by filing a written motion." "The court may order the court files and records . . . in a civil action to be sealed or redacted" so long as "the specific sealing or redaction is justified by identified compelling privacy or safety interests that outweigh the public interest in access to the court record." SRCR 3(4). Privacy interests that outweigh the public interest in access to the court records include that (1) "[t]he sealing or redaction is permitted or required by federal or state law," or (2) "[t]he sealing or redaction furthers . . . a protective order entered under NRCR 26(c)." SRCR 3(4)(a)-(b). Finally, on appeal, "[c]ourt records sealed in the trial court shall be sealed from public access in the Nevada Supreme Court subject to further order of that court."¹ SRCR 7.

Here, good cause exists to grant Wynn's motion to redact his Opening Brief and seal Joint Appendix Volume 4. First, the district court granted Wynn's unopposed Motion to Redact Opposition to the Associated Press Defendants' Renewed Special Motion to Dismiss Pursuant to NRS 41.660 (anti-SLAPP Statute) and Seal Exhibits 3, 4, 6, and 9 Thereto. (Ex. A). Pursuant to the parties' protective order, discussed below, Wynn moved to redact portions of Opposition and seal

¹ Similarly, once a party moves to seal or redact a court record, "the information to be sealed or redacted remains confidential for a reasonable period of time until the court rules on the motion." SRCR 3(3).

certain exhibits because they were designated confidential by the Associated Press (the "AP") and Regina Garcia Cano (collectively the "AP Respondents"). Thus, the unredacted version of Wynn's Opposition, as well as the designated exhibits, are presumptively sealed. *See* SRCR 7. Accordingly, as Wynn's Opening Brief discusses and summarizes the documents that are presumptively sealed, good cause exists to allow Wynn to redact his opening brief as well as seal Joint Appendix 4, which contains the unredacted and unsealed versions.

Second, the parties entered into a Stipulated Protective and Confidentiality Order under NRCp 26. (Ex. B). While AP waived its privilege under NRS 49.275² to facilitate discovery, it nonetheless identified the exhibits in Joint Appendix 4 as confidential pursuant to the Stipulated Protective and Confidentiality Order. Because Wynn's Opening Brief discusses, summarizes, and quotes numerous documents designated as Confidential by AP, redaction is necessary as it furthers the parties' protective order. Similarly, sealing Joint Appendix 4 is necessary to further the parties' protective order as allowing that information to be publicly filed would contravene the intent of the parties' protective order.

² *See* NRS 49.275 ("No reporter, former reporter or editorial employee of any newspaper . . . may be required to disclose any published or unpublished information obtained or prepared by such person in such person's professional capacity."). While AP waived this privilege to a limited extent to comply with discovery, such information was nonetheless deemed confidential under the parties' confidentiality agreement. As such, this redaction and sealing is permitted by Nevada law.

Based on the foregoing and good cause appearing, Wynn respectfully requests that his Court all him to redact portions of his Opening Brief pursuant to SRCR 3(4)(1)-(b), allow Appendix 4 to be filed under seal, and that such information remain redacted and/or sealed for a reasonable time until further order of this Court.

DATED this 1st day of May, 2023.

PISANELLI BICE PLLC

By: /s/ Todd L. Bice

Todd L. Bice, Esq., #4534
Jordan T. Smith, Esq., #12097
Emily A. Buchwald, Esq., #13442
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Las Vegas, Nevada 89101

Attorneys for Appellant Steve Wynn

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Pisanelli Bice, PLLC, and that on this 1st day of May, 2023, I electronically filed and served by electronic mail a true and correct copy of the above and foregoing **STEVE WYNN'S MOTION TO REDACT OPENING BRIEF AND SEAL CONFIDENTIAL VOLUMES OF THE APPELLANT'S APPENDIX THERETO** properly addressed to the following:

David E. Chavez, Esq.
Ballard Spahr LLP
1980 Festival Plaza Drive, Suite 900
Las Vegas, NV 89135

Jay Ward Brown, Esq.
Chad R. Bowman, Esq.
Ballard Spahr LLP
1909 K Street NW
Washington, DC 20006

Attorneys for The Associated Press and Regina Garcia Cano

/s/ Kimberly Peets
An employee of Pisanelli Bice PLLC

EXHIBIT A

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Tort

COURT MINUTES

September 15, 2022

A-18-772715-C Steve Wynn, Plaintiff(s)
vs.
Associated Press, Defendant(s)

**September 15, 2022 3:00 AM Motion to Seal/Redact
Records**

HEARD BY: Israel, Ronald J. **COURTROOM:** RJC Courtroom 15C

COURT CLERK: Patia Cunningham

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

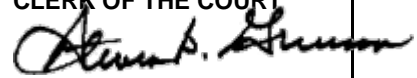
JOURNAL ENTRIES

- Plaintiff filed this Motion to Redact Opposition to the Associated Press Defendants' Renewed Special Motion to Dismiss Pursuant to NRS 41.660 (Anti-SLAPP Statute) and Seal Exhibits 3, 4, 6, and 9 on August 9, 2022. Defendant The Associated Press filed a Non-Opposition to Plaintiff ' Motion on August 23, 2022. Thus, since there is no opposition and good cause appearing, Plaintiff ' Motion is GRANTED.

This Decision sets forth the Court's intended disposition on the subject but anticipates further Order of the Court to make such disposition effective as an Order. Such Order should set forth a synopsis of the supporting reasons proffered to the Court in briefing. Plaintiff s counsel is to prepare the Order and submit to Chambers for consideration in accordance with EDCR 7.21.

CLERK'S NOTE: This Minute Order was electronically served to all registered parties for Odyssey File & Serve or e-mail. /pc 9/23/22

EXHIBIT B



NEOJ

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brownjay@ballardspahr.com
bowmanchad@ballardspahr.com

Attorney for Defendants

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

STEVE WYNN, an individual

Case No. A-18-772715-C

Plaintiffs,

Dept. No. XXVIII

v.

THE ASSOCIATED PRESS, a foreign
corporation; REGINA GARCIA CANO,
an individual; and HALINA KUTA, an
individual; DOES I-X,

Defendants.

**NOTICE OF ENTRY OF
STIPULATED PROTECTIVE AND CONFIDENTIALITY ORDER**

Please take notice that a Stipulated Protective and Confidentiality Order was
entered on May 7, 2021. A copy is attached as Exhibit A.

///

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///

1 Dated: May 7, 2021

2 BALLARD SPAHR LLP

3 By: /s/ Maria A. Gall

4 Maria A. Gall, Esq.
5 Nevada Bar No. 14200
6 1980 Festival Plaza Drive, Suite 900
7 Las Vegas, Nevada 89135

8 -and-

9 Jay W. Brown, Esq.
10 (admitted *pro hac vice*)
11 Chad R. Bowman, Esq.
12 (admitted *pro hac vice*)
13 BALLARD SPAHR LLP
14 1909 K Street NW
15 Washington DC 20006

16 *Attorneys for Defendants*

17
18
19
20
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CERTIFICATE OF SERVICE

I certify that on the May 7, 2021, I served a true and correct copy of the foregoing **NOTICE OF ENTRY OF STIPULATED PROTECTIVE AND CONFIDENTIALITY ORDER** on the following parties by filing the same with the Court's e-filing system:

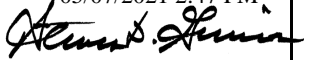
Todd L. Bice, Esq.
Debra L. Spinelli, Esq.
Emily A. Buchwald, Esq.
PISANELLI BICE PLLC
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101

Attorneys for Plaintiff

/s/ Adam Crawford
An Employee of Ballard Spahr LLP

EXHIBIT A

EXHIBIT A


CLERK OF THE COURT

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Attorney for Defendants

**EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA**

STEVE WYNN, an individual

Plaintiffs,

v.

THE ASSOCIATED PRESS, a foreign
corporation; REGINA GARCIA CANO,
an individual; and HALINA KUTA, an
individual; DOES I-X,

Defendants.

Case No. A-18-772715-C

Dept. No. XXVIII

STIPULATED PROTECTIVE AND CONFIDENTIALITY ORDER

WHEREAS, pursuant to the stipulation of plaintiff Steve Wynn and
defendants The Associated Press (“AP”) and Regina Garcia Cano (together,
“defendants”), and it appearing to the Court that:

- A. The parties are engaged in limited discovery, which will include, *inter alia*, the production of documents;
- B. In the course of such discovery, certain confidential information has been or may be requested and produced, including, but not limited to unpublished communications and information generated or collected in the course of gathering and reporting the news (hereinafter,

“CONFIDENTIAL” information);

C. The parties are interested in permitting discovery to proceed without delay occasioned by possible disputes regarding the confidential nature and uses of such information; and

D. Good cause exists for the entry of a protective order treating certain discovery materials as confidential.

ACCORDINGLY, IT IS HEREBY STIPULATED THAT:

1. All discovery designated CONFIDENTIAL pursuant to this Order shall be used solely for the prosecution or defense of this action and shall not be used or disclosed for any other purpose.

2. Information produced by any party in the course of discovery may be designated as CONFIDENTIAL by the party producing the material, provided such material is, in fact, confidential in nature and would not otherwise be available from any source other than the party producing such material in compliance with the discovery request. A party shall not routinely designate material as CONFIDENTIAL, or make such a designation without reasonable inquiry to determine whether it qualifies for such designation.

3. For all materials which a party wishes to designate as CONFIDENTIAL, such designation shall be made by marking each page of such material with the word “CONFIDENTIAL.” DVDs, recordings or other documents which may be impractical to designate in such a fashion may be labeled CONFIDENTIAL in any manner reasonably sufficient to give notice of their protected nature.

4. Counsel for any party may designate that portion of a deposition transcript containing CONFIDENTIAL information as CONFIDENTIAL by advising all counsel in writing within fourteen (14) calendar days of receipt of the written deposition transcript. Until the expiration of this period of time, all deposition transcripts and information contained therein shall temporarily be deemed

1 CONFIDENTIAL. All deposition transcripts and all copies of deposition transcripts
2 that are designated CONFIDENTIAL, in whole or in part, shall be prominently
3 marked "CONFIDENTIAL" on the cover thereof.

4 5. Depositions, documents and things constituting CONFIDENTIAL
5 information designated as CONFIDENTIAL and generated and/or produced
6 pursuant to this Order; any CONFIDENTIAL information contained therein; any
7 notes, abstracts or summaries of CONFIDENTIAL information made therefrom; and
8 any copies or duplicates, shall not be disclosed in any manner to anyone other than
9 the following:

- 10 a. The parties to this case, including the officers, directors or
11 employees of defendant AP, who have responsibility for assisting
12 counsel in this action;
 - 13 b. Counsel for the parties, including in-house counsel for defendants,
14 and legal assistants, and clerical and secretarial personnel of the
15 parties' counsel assisting in the conduct of this action;
 - 16 c. Trial or deposition witnesses, including any expert witnesses or
17 consultants retained in connection with this litigation and for the
18 sole purpose of preparing the expert witness or consultant to testify
19 or to consult with the parties' attorneys;
 - 20 d. Stenographic reporters employed by counsel or the Court who are
21 engaged in such proceedings as are necessarily incident to the
22 conduct of this action;
 - 23 e. This Court, and its staff, or any other Court, panel or tribunal, and
24 its staff, that this matter may come before;
 - 25 f. The jury in this case; and
 - 26 g. Such other persons as may be mutually agreed upon in writing by
27 the parties prior to any disclosure.
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1 6. Each person to whom CONFIDENTIAL information is disclosed shall be
2 advised, by counsel for plaintiff or defendants, as the case may be, of this Order. If
3 any party wishes to disclose CONFIDENTIAL information to any expert or witness
4 described in paragraph 5(c), that party must secure the expert's or witness's
5 agreement in writing prior to the time of disclosure to comply with and be bound by
6 the terms of this Order. Such writing shall be retained by counsel obtaining same.
7 A copy of the agreement to abide by this Order is attached hereto.

8 7. Each person to whom CONFIDENTIAL information is disclosed shall
9 not make copies, duplicates, extracts, summaries or descriptions of the material or
10 information or any portion thereof, except as may be necessary in connection with
11 preparation for discovery and prosecution or defense of this action, and any appeals
12 therein. Any such copies, duplicates, extracts, summaries or descriptions shall be
13 marked with the appropriate legend and shall be treated as CONFIDENTIAL
14 information subject to all the terms and conditions of this Order.

15 8. The acceptance by a party of discovery material designated as
16 "CONFIDENTIAL" shall not constitute a concession that the disclosure or material
17 is properly designated. The parties specifically reserve the right to object to the
18 designation of any disclosure designated "CONFIDENTIAL." Any party shall
19 challenge the designation of material as CONFIDENTIAL by notifying in writing,
20 including but not limited to via email, counsel for the party who made the original
21 designation. Such notice shall specify with particularity the material which is
22 deemed to have been improperly designated and each reason why such material
23 should not continue to be so designated. The party who designated such material as
24 CONFIDENTIAL shall send a written response, specifying with particularity good
25 cause as to why such material should be so designated, within seven (7) calendar days
26 of receipt of notice challenging the designation. If, after receiving such response, the
27 party challenging the designation still contends that the material is not properly
28 designated, that party may then file a motion with the Court requesting that the

1 designation be removed. The burden of proving the confidentiality of designated
2 information remains with the party asserting such confidentiality. The disputed
3 material shall be treated as CONFIDENTIAL pending resolution of the motion. If
4 the party challenging the designation declines to make such a motion, the material
5 shall remain as designated by the producing party.

6 9. Notwithstanding the designation of any testimony, document, thing, or
7 other information as CONFIDENTIAL, such testimony, document, thing, or other
8 information shall not be deemed CONFIDENTIAL and shall not be subject to this
9 Order if the substance of testimony, document, thing, or other information: (a) is, at
10 the time of disclosure by the producing party, already in the possession of the
11 recipient party and was not acquired from the producing party; (b) has been made
12 available to the recipient party, other than through the discovery process, by a third
13 party who obtained the same without any obligation of confidence to the producing
14 party; and/or (c) is already public information. In addition, nothing in this Order
15 shall be construed to prevent a party from possessing, using, and/or publishing as
16 they see fit any information or materials that they receive, derive or develop from
17 sources independent of CONFIDENTIAL information produced by the other party.
18 Furthermore, nothing in this Order is intended to preclude the producing party from
19 any use of its own CONFIDENTIAL information.

20 10. This Order may be modified by further order of the Court and is entered
21 without prejudice to the rights of any party to move for relief from any of its
22 provisions, or to seek or agree to different or additional protection for any particular
23 material, document or information.

24 11. Each person who obtains material or information designated under this
25 Order shall take reasonable precautions to maintain the confidentiality of such
26 material or information in accordance with the terms of this Order.

27 12. Entering into, agreeing to and/or complying with the terms of this Order
28 shall not: (a) prejudice in any way the rights of any party to object to the production

1 of documents or information it considers not properly subject to discovery, or to seek
2 a determination whether particular discovery materials must be produced or
3 disclosed; and/or (b) prevent a party from redacting information upon an assertion of
4 privilege or some other objection from documents or information otherwise produced
5 with a CONFIDENTIAL designation.

6 13. To the extent documents and/or information designated
7 CONFIDENTIAL must be filed under seal and/or under redaction, the filing party
8 shall do so consistent with the procedure for sealing and/or redacting documents,
9 including the Nevada Rules for Sealing and Redacting Court Records (SRCR) 3. The
10 *designating* party then bears the burden of justifying the proposed seal. The sealing
11 and/or redaction of a CONFIDENTIAL document or information in connection with
12 motion practice does not prejudice a party's right to use that information or
13 document, with notice to the designating party, at any trial, and the burden to seal
14 information at trial, even if previously sealed during motions practice, rests with the
15 designating party. The filing of CONFIDENTIAL information under seal shall be
16 without prejudice to the filing party's rights under this Order to challenge the
17 designation of confidentiality.

18 14. Inadvertent or unintentional production of any CONFIDENTIAL
19 information by a party, regardless of whether the information is so designated at the
20 time of disclosure, will not be deemed a waiver in whole or in part of that party's prior
21 or subsequent claim of confidentiality. Such inadvertent or unintentional production
22 may be rectified by notifying in writing counsel for the party to whom the material
23 was disclosed that the material should have been designated.

24 15. Within thirty (30) calendar days of the termination of the litigation, all
25 material treated as CONFIDENTIAL under this Order and not received in evidence
26 shall be returned by the recipient party to the producing party, or destroyed instead
27 of being returned, provided that counsel for the receiving party certifies in writing as
28 to the destruction. The obligation to return or destroy all designated information

1 similarly applies to any individual or entity, including without limitation experts or
2 consultants, retained, hired or employed by the recipient party.

3 16. The entry of this Order shall not deprive any party of its right to object
4 to discovery on any permitted ground, nor impair the right of any party to raise or
5 assert any defense, privilege or objection including, without limitation, defenses or
6 objections to the discovery or production of documents, information, or testimony or
7 to the use, relevance or admissibility of any evidence, whether or not that evidence is
8 comprised in whole or in part of information designated pursuant to this Order.

9 17. Nothing in this Order shall be construed as requiring disclosure of
10 documents, information, or any other materials designated "CONFIDENTIAL" that
11 counsel for a party contends are protected by privilege or other legal objection,
12 including but not limited to relevancy or the permissible scope of discovery. The
13 parties specifically reserve the right to raise all appropriate objections to any request
14 for testimony, documents or other evidence, or the admissibility thereof. No party
15 waives any objection it otherwise would have to disclosing or producing any
16 information or item on any recognized ground, whether or not it is addressed in this
17 Order, and the parties agree that they shall not use this Order to support a waiver
18 argument in any discovery motion, or to argue that any party waived its objections to
19 produce any particular documents or information.

20 18. The entry of this Order is without prejudice to any party's right to move
21 at a later time for another protective order for any purpose.

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19. This Order shall be effective from the date on which it is entered by the Court, and shall apply to all discovery in this matter.

Dated this 6th day of May, 2021.

PISANELLI BICE PLLC

By: /s/Emily A. Buchwald

Todd L. Bice, Esq.
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Debra L. Spinelli, Esq.
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Emily A. Buchwald, Esq.
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Attorneys for Plaintiff

BALLARD SPAHR LLP

By: /s/ Maria A. Gall

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Nevada Bar No. 14200
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135

Jay W. Brown, Esq.
(admitted *pro hac vice*)
Chad R. Bowman, Esq.
(admitted *pro hac vice*)
1909 K Street NW
Washington DC 20006

Attorneys for Defendants

ORDER

IT IS SO ORDERED.

Dated this ____ day of _____, ~~2021~~ **Dated this 7th day of May, 2021**



DISTRICT COURT JUDGE
A-18-772715-C

D6A F2F 324B 87DD SC
Ronald J. Israel
District Court Judge

Submitted by:

BALLARD SPAHR LLP

By: /s/ Maria A. Gall

Maria A. Gall, Esq.
Nevada Bar No. 14200
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135

Attorneys for Defendants

DISTRICT COURT
CLARK COUNTY, NEVADA

STEVE WYNN, an individual

Plaintiffs,

v.

THE ASSOCIATED PRESS, a foreign
corporation; REGINA GARCIA CANO,
an individual; and HALINA KUTA, an
individual; DOES I-X,

Defendants.

Case No. A-18-772715-C

Dept. No. XXVIII

**ACKNOWLEDGMENT OF
CONFIDENTIALITY AND
AGREEMENT TO BE BOUND BY
PROTECTIVE ORDER**

I, the undersigned, declare the following:

1. My address is _____.
2. My present employer is _____ and the address
of my present employment is _____.
3. My present occupation or job description is _____.
4. I have read and understood the provisions of the STIPULATED
PROTECTIVE ORDER (the "Order") in this case entered by the Court, and I will
comply with all provisions of the Order.
5. I will hold in confidence and not disclose to anyone not qualified under
the Order any CONFIDENTIAL information or any words, summaries, abstracts, or
indices of such material disclosed to me.
6. I will limit use of CONFIDENTIAL material disclosed to me solely for
purposes of this action.
7. No later than the final conclusion of the case, I will return any
CONFIDENTIAL material and summaries, abstracts, and indices thereof which
come into my possession, and documents or things which I have prepared relating
thereto, to counsel for the party for whom I was employed or retained, or who
otherwise provided such material to me.
8. I have been advised that any unauthorized use or disclosure by me of
CONFIDENTIAL documents, testimony and/or information would be a breach of

1 the Order for which I may be liable for damages and/or subject to sanction by the
2 Court. I agree to subject myself to the jurisdiction of the Court for the limited
3 purpose of the enforcement of the provisions of the foregoing agreement.

4 I declare under penalty of perjury that the foregoing is true and correct.

5

6 Signature: _____

7 Name: _____

8 Date: _____

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Crawford, Adam (LV)

From: Emily A. Buchwald <eab@pisanellibice.com>
Sent: Thursday, May 6, 2021 12:21 PM
To: Gall, Maria A. (LV); Bowman, Chad R. (DC); Gassmann, Mara J. (DC); Brown, Jay Ward (DC)
Cc: Todd Bice; Debra Spinelli; Nikki Baker; Tammy Peterson
Subject: RE: Wynn/AP - Stipulated Protective and Confidentiality Order

⚠ EXTERNAL

Thanks Maria! You can affix my e-signature and submit to the Court. Is it your intent to wait until the order is signed and entered to serve the confidential documents?

Best,
Emily

Emily A. Buchwald, Esq.

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eab@pisanellibice.com | www.pisanellibice.com

From: Gall, Maria A. <GallM@ballardspahr.com>
Sent: Thursday, May 6, 2021 11:57 AM
To: Emily A. Buchwald <eab@pisanellibice.com>; Bowman, Chad R. <BowmanChad@ballardspahr.com>; Gassmann, Mara J. <GassmannM@ballardspahr.com>; Brown, Jay Ward <brownjay@ballardspahr.com>
Cc: Todd Bice <tlb@pisanellibice.com>; Debra Spinelli <dls@pisanellibice.com>; Nikki Baker <nbaker@petersonbaker.com>; Tammy Peterson <tpeterson@petersonbaker.com>
Subject: RE: Wynn/AP - Stipulated Protective and Confidentiality Order

CAUTION: External Email

Hi Emily.

Thanks for your response. We are fine with your edits. I accepted your changes and then made a few formatting changes and a date update on the signature and order page. Please let us know if we may affix your /s/ signature and submit to the court. We will, of course, cc you. Thanks.

Warm regards,
Maria

From: Emily A. Buchwald <eab@pisanellibice.com>
Sent: Thursday, May 6, 2021 6:34 AM
To: Bowman, Chad R. (DC) <BowmanChad@ballardspahr.com>; Gassmann, Mara J. (DC) <GassmannM@ballardspahr.com>; Gall, Maria A. (LV) <GallM@ballardspahr.com>; Brown, Jay Ward (DC) <brownjay@ballardspahr.com>
Cc: Todd Bice <tlb@pisanellibice.com>; Debra Spinelli <dls@pisanellibice.com>; Nikki Baker

<nbaker@petersonbaker.com>; Tammy Peterson <tpeterson@petersonbaker.com>

Subject: Wynn/AP - Stipulated Protective and Confidentiality Order

 **EXTERNAL**

Good Morning,

Attached are our limited edits to the proposed Stipulated Protective and Confidentiality Order, with track changes. The edits are solely to Paragraph 13, which deals with the process for sealing/redacting Confidential information in court filings. We agree that there should be a process for sealing/redacting information, but believe that the meet and confer process prior to filing set forth in the initial draft is unnecessarily cumbersome. Our proposed edits are consistent with the Rules for Sealing and Redacting Court Records.

Please let us know if you would like to discuss.

Emily A. Buchwald, Esq.

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1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Steve Wynn, Plaintiff(s)

CASE NO: A-18-772715-C

7 vs.

DEPT. NO. Department 28

8 Associated Press, Defendant(s)

9
10 **AUTOMATED CERTIFICATE OF SERVICE**

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

14 Service Date: 5/7/2021

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