

CASE NO. 86462

IN THE SUPREME COURT OF NEVADA

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; CRAIG GREEN; R SQUARED GLOBAL SOLUTIONS, LLC, Derivatively on Behalf of DNT ACQUISITION, LLC; and GR BURGR, LLC,

Appellants,

vs.

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

Respondents.

District Court Case No. A-17-760537-B

APPENDIX OF EXHIBITS TO APPELLANT'S OPENING BRIEF

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APPENDIX OF EXHIBITS TO APPELLANTS' OPENING BRIEF

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Notice of Entry of Order Granting Motion to Redact Caesars' Opposition to the Development Parties' Motion For Leave to File A Supplement to their Oppositions to Motions for Summary Judgment on Order Shortening Time, filed July 26, 2022	38	147	AA08072-AA08083
Notice of Entry of Order Granting Motion to Redact Caesars' Reply to Development Parties' Omnibus Supplement to Their Oppositions to Motions for Summary Judgment Filed by Caesars and Ramsay and Seal Exhibit 115 Thereto, filed June 2, 2022	34	132	AA07101-AA07112

<u>Document Title:</u>	<u>Vol. No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Notice of Entry of Order Granting Motion to Redact Caesars' Reply in Support of (1) Counter-Motion for Summary Judgment Against Craig Green; and (2) Cross-Motion for Summary Judgment Against Rowen Seibel and the Seibel-Affiliated Entities (Related to Counts IV – VIII of the First Amended Complaint) and Seal Exhibits 39-43 and 45-47 Thereto; and to Redact Reply in Support of PHWLTV, LLC's Motion for Attorneys' Fees and to Seal Exhibit 4 thereto, filed March 17, 2023	42	167	AA09054-AA09065
Notice of Entry of Order Granting Motion to Redact Caesars' Response to Objections to Evidence Offered in Support of Motions for Summary Judgment, filed July 26, 2022	38	145	AA08051-AA08062
Notice of Entry of Order Granting Motion to Redact Opposition to Craig Green's Motion for Summary Judgment; Countermotion for Summary Judgment Against Craig Green; and Cross-Motion for Summary Judgment Against Rowen Seibel and the Seibel-Affiliated Entities (Related to Counts IV – VIII of the First Amended Complaint) and Seal Exhibits 2-3, 15-18, 21, 23-28, 31 and 33 in Appendix Thereto, filed March 17, 2023	42	166	AA09042-AA09053

<u>Document Title:</u>	<u>Vol. No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Notice of Entry of Order Granting Motion to Redact Replies in Support of Caesars' Motion for Summary Judgment No. 1 and Motion for Summary Judgment No. 2 and to Seal Exhibits 82, 84-87, 90, 82, 99-100, and 109-112 to the Appendix of Exhibits in Support of Caesars' Replies in Support of its Motions for Summary Judgment, filed January 4, 2022	33	121	AA06980-AA06992
Notice of Entry of Order Granting Motion to Seal Exhibit 23 to Caesars' Reply in Support of its Motion for Leave to File First Amended Complaint, filed April 13, 2020	5	57	AA01156-AA01162
Notice of Entry of Order Granting Proposed Plaintiff in Intervention The Original Homestead Restaurant, Inc. d/b/a The Old Homestead Steakhouse's Motion to Intervene, filed October 23, 2018	2	27	AA00383-AA00388
Notice of Entry of Order Granting the Development Parties' Motion for Leave to File a Supplement to Their Opposition to Motions for Summary Judgment, filed December 27, 2021	33	118	AA06945-AA06956
Notice of Entry of Order Granting the Development Parties' Motion to Redact Their Oppositions to the Counter-Motion and Cross-Motion for Summary Judgment and to Seal All or Portions of Exhibits A-2, A-3, B, D-F, and I-N to the Appendix of Exhibits Supporting the Oppositions, filed October 27, 2022	41	162	AA08869-AA08878

<u>Document Title:</u>	<u>Vol. No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Notice of Entry of Stipulated Confidentiality Agreement and Protective Order, filed March 12, 2019	2	33	AA00445-AA00469
Notice of Entry of Stipulation and Order for a Limited Extension of the Dispositive Motion Deadline, filed February 18, 2021	13	88	AA02687-AA02700
Notice of Entry of Stipulation and Order of Dismissal of J. Jeffrey Frederick With Prejudice, filed August 28, 2019	2	37	AA00483-AA00487
Notice of Entry of Stipulation and Order of Dismissal With Prejudice, filed June 3, 2022	34	136	AA07165-AA07173
Notice of Entry of Stipulation and Order to Consolidate Case No. A-17-760537-B with and into Case No. A-17-751759-B, filed February 13, 2018	1	17	AA00218-AA00224
Notice of Entry of Stipulation and Proposed Order to Extend Discovery Deadlines (Ninth Request), filed October 19, 2020	7	70	AA01494-AA01523
Notice of Order Granting Caesars' Motion for Leave to File First Amended Complaint, filed March 11, 2020	5	52	AA01093-AA01100
Objections to Evidence Offered by Caesars in Support of its Motions for Summary Judgment, filed March 30, 2021	20	98	AA04118-AA04125

<u>Document Title:</u>	<u>Vol. No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Objections to Evidence Offered by Caesars in Support of its Opposition to Craig Green’s Motion for Summary Judgment; Counter-Motion for Summary Judgment Against Craig Green; and Cross-Motion for Summary Judgment Against Rowen Seibel and the Seibel-Affiliated Entities (Related to Counts IV-VII of the First Amended Complaint), filed August 31, 2022	38	153	AA08151-AA08154
Objections to Exhibits Offered in Support of Craig Green’s Motion for Summary Judgment, filed July 14, 2022	37	142	AA08034-AA08037
Objections to Exhibits Offered in Support of Craig Green’s Opposition to Caesars’ Counter-Motion for Summary Judgment and Rowen Seibel and the Development Entities’ Opposition to Caesars’ Cross-Motion for Summary Judgment, filed October 12, 2022	39	157	AA08432-AA08435
Objections to Exhibits Offered in Support of Plaintiffs’ Omnibus Supplement to Their Oppositions to Motions For Summary Judgment, filed January 13, 2022	33	123	AA07003-AA07006
Objections to Exhibits Offered in Support of the Seibel Parties’ Oppositions to Caesars’ Motions for Summary Judgment, filed November 30, 2021	32	114	AA06801-AA06808
Omnibus Order Granting the Development Entities, Rowen Seibel, and Craig Green’s Motions to Seal and Redact, filed May 26, 2021	31	109	AA06426-AA06437

<u>Document Title:</u>	<u>Vol. No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Omnibus Order Granting the Development Parties' Motions to Seal and Redact, filed February 8, 2022	33	126	AA07030-AA07038
Opposition to Caesars Motion for Leave to File First Amended Complaint, filed December 23, 2019 – FILED UNDER SEAL	5	47	AA00935-AA01009
Opposition to Craig Green's Motion for Summary Judgment; Counter-Motion for Summary Judgment Against Craig Green; and Cross-Motion for Summary Judgment Against Rowen Seibel and the Seibel-Affiliated Entities (Related to Counts IV-VIII of the First Amended Complaint), filed July 14, 2022 – FILED UNDER SEAL	35	139	AA07450-AA07475
Opposition to Motion to Amend LLTQ/FERG Defendants' Answer, Affirmative Defenses and Counterclaims, filed on October 14, 2019	3	39	AA00605-AA00704
Order (i) Denying the Development Entities, Rowen Seibel, and Craig Green's Motion: (1) For Leave to Take Caesars' NRCP 30(b)(6) Depositions; and (2) to Compel Responses to Written Discovery on Order Shortening Time; and (ii) Granting Caesars' Countermotion for Protective Order and for Leave to Take Limited Deposition of Craig Green, filed on February 4, 2021	13	85	AA02657-AA02664
Order Denying Motion to Amend LLTQ/FERG Defendants' Answer, Affirmative Defenses and Counterclaims, filed on November 25, 2019	4	43	AA00759-AA00762

<u>Document Title:</u>	<u>Vol. No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Order Granting Caesars' Motion for Leave to File First Amended Complaint, filed March 10, 2020	5	51	AA01088-AA01092
Order Granting Craig Green's Motion to Seal Exhibits 1-6 and 9-11 to His Motion for Summary Judgment, filed August 15, 2022	38	148	AA08084-AA08090
Order Granting Motion to Redact Caesars' Motion for Summary Judgment No. 1 and Motion for Summary Judgment No. 2 and to Seal Exhibits 1-36, 38, 40-42, 45-46, 48, 50, 66-67, 73, and 76-80 to the Appendix of Exhibits in Support of Caesars' Motions for Summary Judgment, filed January 28, 2022	33	124	AA07007-AA07016
Order Granting Motion to Redact Caesars' Opposition to the Development Entities, Rowen Seibel, and Craig Green's Motion: (1) For Leave to Take Caesars' NRCP 30(b)(6) Depositions; and (2) To Compel Responses to Written Discovery on Order Shortening Time; and Countermotion for Protective Order and for Leave to Take Limited Deposition of Craig Green and Seal Exhibits 3-6, 8-11, 13, 14, and 16 Thereto, filed February 2, 2021	13	81	AA02601-AA02611
Order Granting Motion to Redact Caesars' Opposition to the Development Parties' Motion For Leave to File A Supplement to their Oppositions to Motions for Summary Judgment on Order Shortening Time, filed July 26, 2022	38	146	AA08063-AA08071

<u>Document Title:</u>	<u>Vol. No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Order Granting Motion to Redact Caesars' Reply in Support of (1) Counter-Motion for Summary Judgment Against Craig Green; and (2) Cross-Motion for Summary Judgment Against Rowen Seibel and the Seibel-Affiliated Entities (Related to Counts IV – VIII of the First Amended Complaint) and Seal Exhibits 39-43 and 45-47 Thereto; and to Redact Reply in Support of PHWLTV, LLC's Motion for Attorneys' Fees and to Seal Exhibit 4 thereto, filed March 16, 2023	42	165	AA09033-AA09041
Order Granting Motion to Redact Caesars' Reply to Development Parties' Omnibus Supplement to Their Oppositions to Motions for Summary Judgment Filed by Caesars and Ramsay and Seal Exhibit 115 Thereto, filed May 31, 2022	34	131	AA07092-AA07100
Order Granting Motion to Redact Caesars' Response to Objections to Evidence Offered in Support of Motions for Summary Judgment, filed July 26, 2022	38	144	AA08042-AA08050
Order Granting Motion to Redact Opposition to Craig Green's Motion for Summary Judgment; Countermotion for Summary Judgment Against Craig Green; and Cross-Motion for Summary Judgment Against Rowen Seibel and the Seibel-Affiliated Entities (Related to Counts IV – VIII of the First Amended Complaint) and Seal Exhibits 2-3, 15-18, 21, 23-28, 31 and 33 in Appendix Thereto, filed March 16, 2023	42	164	AA09024-AA09032

<u>Document Title:</u>	<u>Vol. No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Order Granting Motion to Redact Replies in Support of Caesars' Motion for Summary Judgment No. 1 and Motion for Summary Judgment No. 2 and to Seal Exhibits 82, 84-87, 90, 82, 99-100, and 109-112 to the Appendix of Exhibits in Support of Caesars' Replies in Support of its Motions for Summary Judgment, filed January 3, 2022	33	120	AA06970-AA06979
Order Granting Motion to Seal Exhibit 23 to Caesars' Reply in Support of its Motion for Leave to File First Amended Complaint, filed April 13, 2020	5	56	AA01152-AA01155
Order Granting Proposed Plaintiff in Intervention The Original Homestead Restaurant, Inc. d/b/a The Old Homestead Steakhouse's Motion to Intervene, filed October 23, 2018	2	26	AA00381-AA00382
Order Granting the Development Parties' Motion for Leave to File a Supplement to Their Opposition to Motions for Summary Judgment, filed December 27, 2021	33	117	AA06936-AA06944
Order Granting the Development Parties' Motion to Redact Their Oppositions to the Counter-Motion and Cross-Motion for Summary Judgment and to Seal All or Portions of Exhibits A-2, A-3, B, D-F, and I-N to the Appendix of Exhibits Supporting the Oppositions, filed October 26, 2022	41	161	AA08862-AA08868
Plaintiff's Reply to Defendant PHWLTV, LLC's Counterclaims, filed August 25, 2017	1	9	AA00168-AA00173

<u>Document Title:</u>	<u>Vol. No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Reply in Support of (1) Counter-Motion for Summary Judgment Against Craig Green and (2) Cross-Motion for Summary Judgment Against Rowen Seibel and the Seibel-Affiliated Entities (Related to Counts IV-VIII of the First Amended Complaint), filed October 12, 2022 – FILED UNDER SEAL	39	158	AA08436-AA08452
Reply in Support of Craig Green’s Motion for Summary Judgment, filed October 12, 2022	39	155	AA08411-AA08422
Reply in Support of Motion to Amend LLTQ/FERG Defendants’ Answer, Affirmative Defenses and Counterclaims, filed on October 17, 2019	3	41	AA00711-AA00726
Reply to DNT Acquisition, LLC’s Counterclaims, filed July 25, 2018	2	23	AA00339-AA00350
Reply to LLTQ/FERG Defendants’ Counterclaims, filed July 25, 2018	2	24	AA00351-AA00374
Reporter’s Transcript, taken December 14, 2020	13	80	AA02498-AA02600
Reporter’s Transcript, taken December 6, 2021	33	116	AA06820-AA06935
Reporter’s Transcript, taken February 12, 2020	5	50	AA01060-AA01087
Reporter’s Transcript, taken May 20, 2020	6	60	AA01170-AA01224
Reporter’s Transcript, taken November 22, 2022	42	163	AA08879-AA09023

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Reporter's Transcript, taken November 6, 2019	4	42	AA00727- AA00758
Reporter's Transcript, taken September 23, 2020	7	67	AA01389- AA01462
Request for Judicial Notice of Exhibit 30 in Appendix of Exhibits in Support of Caesars' Opposition to Craig Green's Motion for Summary Judgment; Counter-Motion for Summary Judgment Against Craig Green; and Cross-Motion for Summary Judgment Against Rowen Seibel and the Seibel-Affiliated Entities (Related to Counts IV-VIII of the First Amended Complaint), filed July 14, 2022	37	143	AA08038- AA08041
Request for Judicial Notice of Exhibits 39, 59, and 62 in Appendix of Exhibits in Support of Caesars' Motions for Summary Judgment, filed February 25, 2021	20	96	AA04076- AA04079
Response to Objections to Evidence Offered by Caesars in Support of its Opposition to Craig Green's Motion for Summary Judgment; Counter-Motion for Summary Judgment Against Craig Green; and Cross-Motion for Summary Judgment Against Rowen Seibel and the Seibel-Affiliated Entities (Related to Counts IV-VII of the First Amended Complaint), filed August 31, 2022	38	152	AA08146- AA08150

<u>Document Title:</u>	<u>Vol. No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Response to Objections to Evidence Offered by Caesars in Support of Its Opposition to Craig Green’s Motion for Summary Judgment; Counter-Motion for Summary Judgment Against Craig Green; and Cross-Motion for Summary Judgment Against Rowen Seibel and the Seibel-Affiliated Entities (Related to Counts IV-VIII of the First Amended Complaint), filed October 12, 2022	39	156	AA08423-AA08431
Rowen Seibel and the Development Entities’ Opposition to Caesars’ Cross-Motion for Summary Judgment, filed August 31, 2022 – FILED UNDER SEAL	38	151	AA08123-AA08145
Stipulated Confidentiality Agreement and Protective Order, filed March 12, 2019	2	32	AA00423-AA00444
Stipulation and Order for a Limited Extension of the Dispositive Motion Deadline, filed February 17, 2021	13	87	AA02676-AA02686
Stipulation and Order of Dismissal of J. Jeffrey Frederick With Prejudice, filed August 28, 2019	2	36	AA00481-AA00482
Stipulation and Order of Dismissal With Prejudice, filed June 2, 2022	34	133	AA07113-AA07118
Stipulation and Order to Consolidate Case No. A-17-760537-B with and into Case No. A-17-751759-B, filed February 9, 2018	1	16	AA00214-AA00217
Stipulation and Proposed Order to Extend Discovery Deadlines (Ninth Request), filed October 15, 2020	7	69	AA01467-AA01493

<u>Document Title:</u>	<u>Vol. No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
Substitution of Attorneys for GR Burger, LLC, filed March 17, 2021	20	97	AA04080-AA04417
The Development Entities and Rowen Seibel's Opposition to Caesars' Motion for Summary Judgment No. 1, filed March 30, 2021 – FILED UNDER SEAL	20	99	AA04126-AA04175
The Development Entities, Rowen Seibel, and Craig Green's Answer to Caesars' First Amended Complaint and Counterclaims, filed June 19, 2020	6	62	AA01231-AA01281
The Development Entities, Rowen Seibel, and Craig Green's Motion: (1) For Leave to Take Caesars' NRCP 30(b)(6) Depositions; and (2) To Compel Responses to Written Discovery on Order Shortening Time, filed November 20, 2020 – FILED UNDER SEAL	7	71	AA01524-AA01591
The Development Entities, Rowen Seibel, and Craig Green's: (1) Reply in Support of Motion For Leave/ To Compel; (2) Opposition to Caesars' Countermotion for Protective Order; and (3) Opposition to Motion to Compel Deposition of Craig Green, filed December 7, 2020	12	78	AA02460-AA02469
The Development Entities' Opposition to Caesars' Motion to Strike Counterclaims, and/or in the Alternative, Motion to Dismiss, filed August 3, 2020	6	65	AA01316-AA01373

<u>Document Title:</u>	<u>Vol. No.:</u>	<u>Tab No.:</u>	<u>Page Nos.:</u>
The Development Parties' Omnibus Supplement to Their Oppositions to Motions for Summary Judgment Filed by Caesars and Ramsay, filed December 30, 2021	33	119	AA06957-AA06969
Verified Complaint and Demand for Jury Trial, filed February 28, 2017	1	1	AA00001-AA00036

CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ♦ KENNEDY and that on the 27th day of September, 2023, service of the foregoing was made by mandatory electronic service through the Nevada Supreme Court's electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

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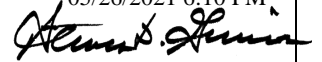
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*Attorneys for Respondents, Desert Palace, Inc.;
Paris Las Vegas Operating Company, LLC;
PHWLV, LLC; and Boardwalk Regency
Corporation*

/s/ Susan Russo

Employee of BAILEY ♦ KENNEDY

TAB 109


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TPOV Enterprises 16, LLC; FERG, LLC; FERG 16, LLC; Craig Green;
R Squared Global Solutions, LLC, Derivatively on Behalf of DNT Acquisition,
LLC; and GR Burgr, LLC*

**DISTRICT COURT
CLARK COUNTY, NEVADA**

ROWEN SEIBEL, an individual and citizen of
New York, derivatively on behalf of Real Party
in Interest GR BURGR LLC, a Delaware limited
liability company,

Plaintiff,

vs.

PHWLTV, LLC, a Nevada limited liability
company; GORDON RAMSAY, an individual;
DOES I through X; ROE CORPORATIONS I
through X,

Defendants,

And

GR BURGR LLC, a Delaware limited liability
company,

Nominal Plaintiff.

AND ALL RELATED CLAIMS.

Case No. A-17-751759-B

Dept. No. XVI

Consolidated with A-17-760537-B

**OMNIBUS ORDER GRANTING THE
DEVELOPMENT ENTITIES, ROWEN SEIBEL,
AND CRAIG GREEN'S MOTIONS TO SEAL AND
REDACT**

This Order addresses the following matters:

- The Development Entities¹ and Rowen Seibel's ("Seibel") Motion to Seal Certain Exhibits to Opposition to Caesars' Motion for Leave to File First Amended Complaint, filed on December 23, 2019, which came before the Court, Department XVI (the Honorable Timothy C. Williams presiding), on February 12, 2020, at 9:00 a.m., for hearing;
- The Development Entities, Seibel, and Craig Green's ("Green") Motion to Redact Their Motion: (1) For Leave to Take Caesars' NRCP 30(b)(6) Depositions; and (2) To Compel Responses to Written Discovery; and to Seal Exhibits 49 Through 57 to the Appendix of Exhibits Related Thereto, filed on November 20, 2020, which came before the Court, Department XVI (the Honorable Timothy C. Williams presiding), on January 6, 2021, at 9:00 a.m., for hearing;
- The Development Entities, Seibel, and Craig Green's ("Green") Motion to Seal Volume 5 of the Appendix to Their Reply in Support of Motion: (1) for Leave to Take Caesars' NRCP 30(b)(6) Depositions; and (2) to Compel Responses to Written Discovery, filed on December 7, 2020, which came before the Court, Department XVI (the Honorable Timothy C. Williams presiding), on January 6, 2021, at 9:00 a.m., for hearing;
- The Development Entities, Seibel, and Green's Motion to Redact Their Opposition to Caesars' Motion to Compel Documents Withheld on the Basis of Attorney-Client Privilege Pursuant to the Crime-Fraud Exception; and to Seal Exhibits 2-20, 22-23, 26-36, 38-60, 62-69, and 71 to the Appendix of Exhibits Related Thereto, filed on January 22, 2021, which came before the Court, Department XVI (the Honorable Timothy C. Williams presiding), on February 24, 2021, at 9:00 a.m., for hearing; and
- The Development Entities, Seibel, and Green's Motion to Seal Exhibits 2-3 and 5-6 to Their Motion to Compel "Confidential" Designation of Caesars' Financial Documents, which came before the Court, Department XVI (the Honorable Timothy C. Williams presiding), on

¹ Moti Partners, LLC ("Moti"); Moti Partners 16, LLC ("Moti 16"); LLTQ Enterprises, LLC ("LLTQ"); LLTQ Enterprises 16, LLC ("LLTQ 16"); TPOV Enterprises, LLC ("TPOV"); TPOV Enterprises 16, LLC ("TPOV 16"); FERG, LLC ("FERG"); FERG 16, LLC ("FERG 16"); and R Squared Global Solutions, LLC ("R Squared"), derivatively on behalf of DNT Acquisition LLC ("DNT"), are collectively referred to as the "Development Entities."

April 9, 2021, in chambers, for hearing (collectively, the “Motions to Seal”).

FINDINGS

Upon review of the papers and pleadings on file in this matter, as proper service has been provided, this Court notes no oppositions were filed to any of the Motions to Seal. Accordingly, pursuant to EDCR 2.20(e), the Motions to Seal are deemed unopposed. In accordance with Part VII of the Nevada Supreme Court Rules Governing Sealing and Redacting Court Records (SRCR), the Court finds that the information sought to be sealed and/or redacted as set forth in the Motions to Seal has been marked Confidential or Highly Confidential under the Stipulated Confidentiality Agreement and Protective Order, entered on March 12, 2019, contains commercially sensitive information, and that the parties’ privacy interests in maintaining the confidential nature of such information outweighs the public interest in access to the court record. SRCR 3(4)(h).

ORDER

Based on the foregoing Findings, and good cause appearing,

IT IS HEREBY ORDERED that the Development Entities and Rowen Seibel’s Motion to Seal Certain Exhibits to Opposition to Caesars’ Motion for Leave to File First Amended Complaint shall be, and hereby is, GRANTED.

IT IS HEREBY FURTHER ORDERED that the Development Entities, Rowen Seibel, and Craig Green’s Motion to Redact Their Motion: (1) For Leave to Take Caesars’ NRCP 30(b)(6) Depositions; and (2) To Compel Responses to Written Discovery; and to Seal Exhibits 49 Through 57 to the Appendix of Exhibits Related Thereto shall be, and hereby is, GRANTED.

IT IS HEREBY FURTHER ORDERED that the Development Entities, Rowen Seibel, and Craig Green’s Motion to Seal Volume 5 of their Appendix to Their Reply in Support of Motion: (1) For Leave to Take Caesars’ NRCP 30(b)(6) Depositions; and (2) To Compel Responses to Written Discovery shall be, and hereby is, GRANTED.

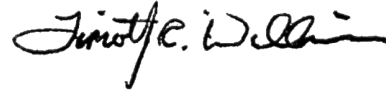
IT IS HEREBY FURTHER ORDERED that the Development Entities, Rowen Seibel, and Craig Green’s Motion to Redact Their Opposition to Caesars’ Motion to Compel Documents Withheld on the Basis of Attorney-Client Privilege Pursuant to the Crime-Fraud Exception; and to

Seal Exhibits 2-20, 22-23, 26-36, 38-60, 62-69, and 71 to the Appendix of Exhibits Related Thereto shall be, and hereby is, GRANTED.

IT IS HEREBY FURTHER ORDERED that the Development Entities, Rowen Seibel, and Craig Green's Motion to Seal Exhibits 2-3 And 5-6 to Their Motion to Compel "Confidential" Designation of Caesars' Financial Documents shall be, and hereby is, GRANTED.

IT IS SO ORDERED.

Dated this 26th day of May, 2021



ZJ

788 4D6 B0A0 08CA
Timothy C. Williams
District Court Judge

Respectfully Submitted By:

Approved as to Form and Content:

BAILEY ♦ KENNEDY

PISANELLI BICE PLLC

By: /s/ Stephanie J. Glantz

By: /s/ M. Magali Mercera

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Seibel, and Green*

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By: /s/ Alan M. Lebensfeld

By: /s/ John D. Tennert

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Attorneys for Ramsay

Susan Russo

From: Magali Mercera <mmm@pisanellibice.com>
Sent: Thursday, May 20, 2021 4:38 PM
To: Stephanie Glantz; James Pisanelli; Debra Spinelli; Emily A. Buchwald; Robert A. Ryan; Cinda C. Towne; Diana Barton; 'alan.lebensfeld@lsandspc.com'; Connot, Mark J.; Tennert, John
Cc: Joshua Gilmore; Paul Williams; Susan Russo
Subject: RE: Seibel adv. Caesars
Attachments: Omnibus Sealing Order 5-18 - PB edits.docx

Stephanie –

Attached please find our minor edits. You may apply my e-signature to this version.

Thanks,

M. Magali Mercera

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mmm@pisanellibice.com | www.pisanellibice.com



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From: Stephanie Glantz <SGlantz@baileykennedy.com>
Sent: Tuesday, May 18, 2021 11:06 AM
To: Magali Mercera <mmm@pisanellibice.com>; James Pisanelli <jjp@pisanellibice.com>; Debra Spinelli <dls@pisanellibice.com>; Emily A. Buchwald <eab@pisanellibice.com>; Robert A. Ryan <RR@pisanellibice.com>; Cinda C. Towne <cct@pisanellibice.com>; Diana Barton <DB@pisanellibice.com>; 'alan.lebensfeld@lsandspc.com' <alan.lebensfeld@lsandspc.com>; Connot, Mark J. <MConnot@foxrothschild.com>; Tennert, John <jtennert@fennemorelaw.com>
Cc: Joshua Gilmore <JGilmore@baileykennedy.com>; Paul Williams <PWilliams@baileykennedy.com>; Susan Russo <SRusso@baileykennedy.com>
Subject: Seibel adv. Caesars

All,

Attached is a proposed Omnibus Order Granting Motions to Seal/Redact. Specifically, it encompasses the following:

- The Development Entities and Rowen Seibel's ("Seibel") Motion to Seal Certain Exhibits to Opposition to Caesars' Motion for Leave to File First Amended Complaint, which came before the Court on February 12, 2020;
- The Development Entities, Seibel, and Craig Green's ("Green") Motion to Redact Their Motion: (1) For Leave to Take Caesars' NRCP 30(b)(6) Depositions; and (2) To Compel Responses to Written Discovery; and to Seal Exhibits 49 Through 57 to the Appendix of Exhibits Related Thereto, which came before the Court on January 6, 2021;

- The Development Entities, Seibel, and Craig Green's ("Green") Motion to Seal Volume 5 of the Appendix to Their Reply in Support of Motion: (1) for Leave to Take Caesars' NRCP 30(b)(6) Depositions; and (2) to Compel Responses to Written Discovery, which came before the Court on January 6, 2021;
- The Development Entities, Seibel, and Green's Motion to Redact Their Opposition to Caesars' Motion to Compel Documents Withheld on the Basis of Attorney-Client Privilege Pursuant to the Crime-Fraud Exception; and to Seal Exhibits 2-20, 22-23, 26-36, 38-60, 62-69, and 71 to the Appendix of Exhibits Related Thereto, which came before the Court on February 24, 2021; and
- The Development Entities, Seibel, and Green's Motion to Seal Exhibits 2-3 and 5-6 to Their Motion to Compel "Confidential" Designation of Caesars' Financial Documents, which came before the Court on April 9, 2021.

Please let me know if I may apply your e-signature.

Thanks,
Stephanie

Stephanie J. Glantz
Bailey❖Kennedy
8984 Spanish Ridge Avenue
Las Vegas, NV 89148-1302
(702) 562-8820 (Main)
(702) 562-8821 (Fax)
(702) 789-4555 (Direct)
SGlantz@baileykennedy.com

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Susan Russo

From: Alan Lebensfeld <Alan.Lebensfeld@lsandspc.com>
Sent: Friday, May 21, 2021 5:35 AM
To: Tennert, John; Stephanie Glantz; Magali Mercera; James Pisanelli; Debra Spinelli; Emily A. Buchwald; Robert A. Ryan; Cinda C. Towne; Diana Barton; Connot, Mark J.
Cc: Joshua Gilmore; Paul Williams; Susan Russo
Subject: RE: Seibel adv. Caesars

Ditto

From: Tennert, John [mailto:jtennert@fennemorelaw.com]
Sent: Thursday, May 20, 2021 8:45 PM
To: Stephanie Glantz; Magali Mercera; James Pisanelli; Debra Spinelli; Emily A. Buchwald; Robert A. Ryan; Cinda C. Towne; Diana Barton; Alan Lebensfeld; Connot, Mark J.
Cc: Joshua Gilmore; Paul Williams; Susan Russo
Subject: RE: Seibel adv. Caesars

Stephanie,
You may apply my e-signature.
Thanks,
John

John D. Tennert III, Director

FENNEMORE.

7800 Rancharrah Parkway, Reno, NV 89511

T: 775.788.2212 | F: 775.788.2213

jtennert@fennemorelaw.com | [View Bio](#)



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From: Stephanie Glantz <SGlantz@baileykennedy.com>
Sent: Thursday, May 20, 2021 5:42 PM
To: Magali Mercera <mmm@pisanellibice.com>; James Pisanelli <jjp@pisanellibice.com>; Debra Spinelli <dls@pisanellibice.com>; Emily A. Buchwald <eab@pisanellibice.com>; Robert A. Ryan <RR@pisanellibice.com>; Cinda C. Towne <cct@pisanellibice.com>; Diana Barton <DB@pisanellibice.com>; 'alan.lebensfeld@lsandspc.com' <alan.lebensfeld@lsandspc.com>; Connot, Mark J. <MConnot@foxrothschild.com>; Tennert, John <jtennert@fennemorelaw.com>
Cc: Joshua Gilmore <JGilmore@baileykennedy.com>; Paul Williams <PWilliams@baileykennedy.com>; Susan Russo

<SRusso@baileykennedy.com>

Subject: RE: Seibel adv. Caesars

All,

Attached is a clean version with Magali's changes incorporated.

John and Alan, please confirm that I may affix your e-signatures to this version.

Thanks,
Stephanie

Stephanie J. Glantz
Bailey❖Kennedy
8984 Spanish Ridge Avenue
Las Vegas, NV 89148-1302
(702) 562-8820 (Main)
(702) 562-8821 (Fax)
(702) 789-4555 (Direct)
SGlantz@baileykennedy.com

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From: Magali Mercera <mmm@pisanellibice.com>

Sent: Thursday, May 20, 2021 4:38 PM

To: Stephanie Glantz <SGlantz@baileykennedy.com>; James Pisanelli <jip@pisanellibice.com>; Debra Spinelli <dls@pisanellibice.com>; Emily A. Buchwald <eab@pisanellibice.com>; Robert A. Ryan <RR@pisanellibice.com>; Cinda C. Towne <cct@pisanellibice.com>; Diana Barton <DB@pisanellibice.com>; 'alan.lebensfeld@lsandspc.com' <alan.lebensfeld@lsandspc.com>; Connot, Mark J. <MConnot@foxrothschild.com>; Tennert, John <jtennert@fennemorelaw.com>

Cc: Joshua Gilmore <JGilmore@baileykennedy.com>; Paul Williams <PWilliams@baileykennedy.com>; Susan Russo <SRusso@baileykennedy.com>

Subject: RE: Seibel adv. Caesars

Stephanie –

Attached please find our minor edits. You may apply my e-signature to this version.

Thanks,

M. Magali Mercera
PISANELLI BICE, PLLC
Telephone: (702) 214-2100
mmm@pisanellibice.com | www.pisanellibice.com



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From: Stephanie Glantz <SGlantz@baileykennedy.com>

Sent: Tuesday, May 18, 2021 11:06 AM

To: Magali Mercera <mmm@pisanellibice.com>; James Pisanelli <jjp@pisanellibice.com>; Debra Spinelli <dls@pisanellibice.com>; Emily A. Buchwald <eab@pisanellibice.com>; Robert A. Ryan <RR@pisanellibice.com>; Cinda C. Towne <cct@pisanellibice.com>; Diana Barton <DB@pisanellibice.com>; 'alan.lebensfeld@lsandspc.com' <alan.lebensfeld@lsandspc.com>; Connot, Mark J. <MConnot@foxrothschild.com>; Tennert, John <jtennert@fennemorelaw.com>

Cc: Joshua Gilmore <JGilmore@baileykennedy.com>; Paul Williams <PWilliams@baileykennedy.com>; Susan Russo <SRusso@baileykennedy.com>

Subject: Seibel adv. Caesars

All,

Attached is a proposed Omnibus Order Granting Motions to Seal/Redact. Specifically, it encompasses the following:

- The Development Entities and Rowen Seibel's ("Seibel") Motion to Seal Certain Exhibits to Opposition to Caesars' Motion for Leave to File First Amended Complaint, which came before the Court on February 12, 2020;
- The Development Entities, Seibel, and Craig Green's ("Green") Motion to Redact Their Motion: (1) For Leave to Take Caesars' NRCP 30(b)(6) Depositions; and (2) To Compel Responses to Written Discovery; and to Seal Exhibits 49 Through 57 to the Appendix of Exhibits Related Thereto, which came before the Court on January 6, 2021;
- The Development Entities, Seibel, and Craig Green's ("Green") Motion to Seal Volume 5 of the Appendix to Their Reply in Support of Motion: (1) for Leave to Take Caesars' NRCP 30(b)(6) Depositions; and (2) to Compel Responses to Written Discovery, which came before the Court on January 6, 2021;
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- The Development Entities, Seibel, and Green's Motion to Seal Exhibits 2-3 and 5-6 to Their Motion to Compel "Confidential" Designation of Caesars' Financial Documents, which came before the Court on April 9, 2021.

Please let me know if I may apply your e-signature.

Thanks,
Stephanie

Stephanie J. Glantz
Bailey❖Kennedy
8984 Spanish Ridge Avenue
Las Vegas, NV 89148-1302
(702) 562-8820 (Main)
(702) 562-8821 (Fax)
(702) 789-4555 (Direct)
SGlantz@baileykennedy.com

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1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

4
5
6 Rowen Seibel, Plaintiff(s)

CASE NO: A-17-751759-B

7 vs.

DEPT. NO. Department 16

8 PHWL V LLC, 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 Order was served via the court's electronic eFile system to all
13 recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 5/26/2021

15 Robert Atkinson robert@nv-lawfirm.com

16 Kevin Sutehall ksutehall@foxrothschild.com

17 "James J. Pisanelli, Esq." . lit@pisanellibice.com

18 "John Tennert, Esq." . jtennert@fclaw.com

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20 Dan McNutt . drm@cmlawnv.com

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22 Diana Barton . db@pisanellibice.com

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24 Matt Wolf . mcw@cmlawnv.com

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AA06435

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4	Steven Chaiken	sbc@ag-ltd.com
5	Alan Lebensfeld	alan.lebensfeld@lsandspc.com
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12	Joshua Gilmore	jgilmore@baileykennedy.com
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16	Cinda Towne	cct@pisanellibice.com
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21	Karen Hippner	karen.hippner@lsandspc.com
22	Lawrence Sharon	lawrence.sharon@lsandspc.com
23	Emily Buchwald	eab@pisanellibice.com
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Robert Ryan	rr@pisanellibice.com
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TAB 110



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Nevada Bar No. 1462

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Nevada Bar No. 11576

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*Attorneys for 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; Craig Green;
R Squared Global Solutions, LLC, Derivatively on Behalf of DNT Acquisition,
LLC; and GR Burgr, LLC*

**DISTRICT COURT
CLARK COUNTY, NEVADA**

ROWEN SEIBEL, an individual and citizen of
New York, derivatively on behalf of Real Party
in Interest GR BURGR LLC, a Delaware limited
liability company,

Plaintiff,

vs.

PHWLTV, LLC, a Nevada limited liability
company; GORDON RAMSAY, an individual;
DOES I through X; ROE CORPORATIONS I
through X,

Defendants,

And

GR BURGR LLC, a Delaware limited liability
company,

Nominal Plaintiff.

AND ALL RELATED CLAIMS.

Case No. A-17-751759-B

Dept. No. XVI

Consolidated with A-17-760537-B

**NOTICE OF ENTRY OF OMNIBUS ORDER
GRANTING THE DEVELOPMENT
ENTITIES, ROWEN SEIBEL, AND CRAIG
GREEN'S MOTIONS TO SEAL AND
REDACT**

1 PLEASE TAKE NOTICE that an Omnibus Order Granting the Development Entities,
2 Rowen Seibel, and Craig Green's Motions to Seal and Redact was entered in the above-entitled
3 action on May 26, 2021, a true and correct copy of which is attached hereto.

4 DATED this 27th day of May, 2021

5 BAILEY ♦ KENNEDY

6 By: /s/ Stephanie J. Glantz

7 JOHN R. BAILEY

8 DENNIS L. KENNEDY

9 JOSHUA P. GILMORE

10 PAUL C. WILLIAMS

11 STEPHANIE J. GLANTZ

12 *Attorneys for Rowen Seibel; Moti Partners, LLC; Moti*
13 *Partners 16, LLC; LLTQ Enterprises, LLC; LLTQ Enterprises*
14 *16, LLC; TPOV Enterprises, LLC; TPOV Enterprises 16,*
15 *LLC; FERG, LLC; FERG 16, LLC; Craig Green; R Squared*
16 *Global Solutions, LLC, Derivatively on Behalf of DNT*
17 *Acquisition, LLC; and GR Burgr, LLC*

CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ♦ KENNEDY and that on the 27th day of May, 2021, service of the foregoing was made by mandatory electronic service through the Eighth Judicial District Court's electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

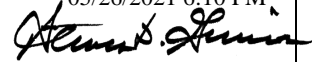
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M. MAGALI MERCERA	MMM@pisanellibice.com
BRITTNE T. WATKINS	BTW@pisanellibice.com
PISANELLI BICE PLLC	<i>Attorneys for Defendants/Counterclaimant Desert</i>
400 South 7 th Street, Suite 300	<i>Palace, Inc.; Paris Las Vegas Operating Company, LLC;</i>
Las Vegas, NV 89101	<i>PHWL, LLC; and Boardwalk Regency Corporation</i>

JOHN D. TENNERT	Email: jtennert@fclaw.com
FENNEMORE CRAIG, P.C.	<i>Attorneys for Defendant Gordon Ramsay</i>
7800 Rancharrah Parkway	
Reno, NV 89511	

ALAN LEBENSFELD	Email: alan.lebensfeld@lsandspc.com
BRETT SCHWARTZ	Brett.schwartz@lsandspc.com
LEBENSFELD SHARON & SCHWARTZ, P.C.	<i>Attorneys for Plaintiff in Intervention</i>
140 Broad Street	<i>The Original Homestead Restaurant, Inc.</i>
Red Bank, NJ 07701	

MARK J. CONNOT	Email: mconnot@foxrothschild.com
KEVIN M. SUTEHALL	ksutehall@foxrothschild.com
FOX ROTHSCHILD LLP	<i>Attorneys for Plaintiff in Intervention</i>
1980 Festival Plaza Drive, #700	<i>The Original Homestead Restaurant, Inc.</i>
Las Vegas, NV 89135	

/s/ Stephanie M. Kishi
Employee of BAILEY ♦ KENNEDY


CLERK OF THE COURT

BAILEY ♦ KENNEDY
8984 SPANISH RIDGE AVENUE
LAS VEGAS, NEVADA 89148-1302
702.562.8820

ORDR (CIV)

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Nevada Bar No. 0137

DENNIS L. KENNEDY

Nevada Bar No. 1462

JOSHUA P. GILMORE

Nevada Bar No. 11576

PAUL C. WILLIAMS

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STEPHANIE J. GLANTZ

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*Attorneys for 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; Craig Green;
R Squared Global Solutions, LLC, Derivatively on Behalf of DNT Acquisition,
LLC; and GR Burgr, LLC*

**DISTRICT COURT
CLARK COUNTY, NEVADA**

ROWEN SEIBEL, an individual and citizen of
New York, derivatively on behalf of Real Party
in Interest GR BURGR LLC, a Delaware limited
liability company,

Plaintiff,

vs.

PHWLTV, LLC, a Nevada limited liability
company; GORDON RAMSAY, an individual;
DOES I through X; ROE CORPORATIONS I
through X,

Defendants,

And

GR BURGR LLC, a Delaware limited liability
company,

Nominal Plaintiff.

AND ALL RELATED CLAIMS.

Case No. A-17-751759-B

Dept. No. XVI

Consolidated with A-17-760537-B

**OMNIBUS ORDER GRANTING THE
DEVELOPMENT ENTITIES, ROWEN SEIBEL,
AND CRAIG GREEN'S MOTIONS TO SEAL AND
REDACT**

This Order addresses the following matters:

- The Development Entities¹ and Rowen Seibel's ("Seibel") Motion to Seal Certain Exhibits to Opposition to Caesars' Motion for Leave to File First Amended Complaint, filed on December 23, 2019, which came before the Court, Department XVI (the Honorable Timothy C. Williams presiding), on February 12, 2020, at 9:00 a.m., for hearing;
- The Development Entities, Seibel, and Craig Green's ("Green") Motion to Redact Their Motion: (1) For Leave to Take Caesars' NRCP 30(b)(6) Depositions; and (2) To Compel Responses to Written Discovery; and to Seal Exhibits 49 Through 57 to the Appendix of Exhibits Related Thereto, filed on November 20, 2020, which came before the Court, Department XVI (the Honorable Timothy C. Williams presiding), on January 6, 2021, at 9:00 a.m., for hearing;
- The Development Entities, Seibel, and Craig Green's ("Green") Motion to Seal Volume 5 of the Appendix to Their Reply in Support of Motion: (1) for Leave to Take Caesars' NRCP 30(b)(6) Depositions; and (2) to Compel Responses to Written Discovery, filed on December 7, 2020, which came before the Court, Department XVI (the Honorable Timothy C. Williams presiding), on January 6, 2021, at 9:00 a.m., for hearing;
- The Development Entities, Seibel, and Green's Motion to Redact Their Opposition to Caesars' Motion to Compel Documents Withheld on the Basis of Attorney-Client Privilege Pursuant to the Crime-Fraud Exception; and to Seal Exhibits 2-20, 22-23, 26-36, 38-60, 62-69, and 71 to the Appendix of Exhibits Related Thereto, filed on January 22, 2021, which came before the Court, Department XVI (the Honorable Timothy C. Williams presiding), on February 24, 2021, at 9:00 a.m., for hearing; and
- The Development Entities, Seibel, and Green's Motion to Seal Exhibits 2-3 and 5-6 to Their Motion to Compel "Confidential" Designation of Caesars' Financial Documents, which came before the Court, Department XVI (the Honorable Timothy C. Williams presiding), on

¹ Moti Partners, LLC ("Moti"); Moti Partners 16, LLC ("Moti 16"); LLTQ Enterprises, LLC ("LLTQ"); LLTQ Enterprises 16, LLC ("LLTQ 16"); TPOV Enterprises, LLC ("TPOV"); TPOV Enterprises 16, LLC ("TPOV 16"); FERG, LLC ("FERG"); FERG 16, LLC ("FERG 16"); and R Squared Global Solutions, LLC ("R Squared"), derivatively on behalf of DNT Acquisition LLC ("DNT"), are collectively referred to as the "Development Entities."

1 April 9, 2021, in chambers, for hearing (collectively, the “Motions to Seal”).

2 **FINDINGS**

3 Upon review of the papers and pleadings on file in this matter, as proper service has been
4 provided, this Court notes no oppositions were filed to any of the Motions to Seal. Accordingly,
5 pursuant to EDCR 2.20(e), the Motions to Seal are deemed unopposed. In accordance with Part VII
6 of the Nevada Supreme Court Rules Governing Sealing and Redacting Court Records (SRCR), the
7 Court finds that the information sought to be sealed and/or redacted as set forth in the Motions to
8 Seal has been marked Confidential or Highly Confidential under the Stipulated Confidentiality
9 Agreement and Protective Order, entered on March 12, 2019, contains commercially sensitive
10 information, and that the parties’ privacy interests in maintaining the confidential nature of such
11 information outweighs the public interest in access to the court record. SRCR 3(4)(h).

12 **ORDER**

13 Based on the foregoing Findings, and good cause appearing,

14 **IT IS HEREBY ORDERED** that the Development Entities and Rowen Seibel’s Motion to
15 Seal Certain Exhibits to Opposition to Caesars’ Motion for Leave to File First Amended Complaint
16 shall be, and hereby is, GRANTED.

17 **IT IS HEREBY FURTHER ORDERED** that the Development Entities, Rowen Seibel, and
18 Craig Green’s Motion to Redact Their Motion: (1) For Leave to Take Caesars’ NRCP 30(b)(6)
19 Depositions; and (2) To Compel Responses to Written Discovery; and to Seal Exhibits 49 Through
20 57 to the Appendix of Exhibits Related Thereto shall be, and hereby is, GRANTED.

21 **IT IS HEREBY FURTHER ORDERED** that the Development Entities, Rowen Seibel, and
22 Craig Green’s Motion to Seal Volume 5 of their Appendix to Their Reply in Support of Motion: (1)
23 For Leave to Take Caesars’ NRCP 30(b)(6) Depositions; and (2) To Compel Responses to Written
24 Discovery shall be, and hereby is, GRANTED.

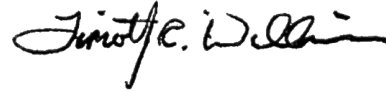
25 **IT IS HEREBY FURTHER ORDERED** that the Development Entities, Rowen Seibel, and
26 Craig Green’s Motion to Redact Their Opposition to Caesars’ Motion to Compel Documents
27 Withheld on the Basis of Attorney-Client Privilege Pursuant to the Crime-Fraud Exception; and to
28

Seal Exhibits 2-20, 22-23, 26-36, 38-60, 62-69, and 71 to the Appendix of Exhibits Related Thereto shall be, and hereby is, GRANTED.

IT IS HEREBY FURTHER ORDERED that the Development Entities, Rowen Seibel, and Craig Green's Motion to Seal Exhibits 2-3 And 5-6 to Their Motion to Compel "Confidential" Designation of Caesars' Financial Documents shall be, and hereby is, GRANTED.

IT IS SO ORDERED.

Dated this 26th day of May, 2021



ZJ

788 4D6 B0A0 08CA
Timothy C. Williams
District Court Judge

Respectfully Submitted By:

Approved as to Form and Content:

BAILEY ♦ KENNEDY

PISANELLI BICE PLLC

By: /s/ Stephanie J. Glantz

By: /s/ M. Magali Mercera

JOHN R. BAILEY
DENNIS L. KENNEDY
JOSHUA P. GILMORE
PAUL C. WILLIAMS
STEPHANIE J. GLANTZ

JAMES J. PISANELLI (#4027)
DEBRA L. SPINELLI (#9695)
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*Attorneys for the Development Entities,
Seibel, and Green*

Attorneys for Caesars

Approved as to Form and Content:

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By: /s/ Alan M. Lebensfeld

By: /s/ John D. Tennert

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Attorneys for OHR

Attorneys for Ramsay

Susan Russo

From: Magali Mercera <mmm@pisanellibice.com>
Sent: Thursday, May 20, 2021 4:38 PM
To: Stephanie Glantz; James Pisanelli; Debra Spinelli; Emily A. Buchwald; Robert A. Ryan; Cinda C. Towne; Diana Barton; 'alan.lebensfeld@lsandspc.com'; Connot, Mark J.; Tennert, John
Cc: Joshua Gilmore; Paul Williams; Susan Russo
Subject: RE: Seibel adv. Caesars
Attachments: Omnibus Sealing Order 5-18 - PB edits.docx

Stephanie –

Attached please find our minor edits. You may apply my e-signature to this version.

Thanks,

M. Magali Mercera

PISANELLI BICE, PLLC

Telephone: (702) 214-2100

mmm@pisanellibice.com | www.pisanellibice.com



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From: Stephanie Glantz <SGlantz@baileykennedy.com>
Sent: Tuesday, May 18, 2021 11:06 AM
To: Magali Mercera <mmm@pisanellibice.com>; James Pisanelli <jjp@pisanellibice.com>; Debra Spinelli <dls@pisanellibice.com>; Emily A. Buchwald <eab@pisanellibice.com>; Robert A. Ryan <RR@pisanellibice.com>; Cinda C. Towne <cct@pisanellibice.com>; Diana Barton <DB@pisanellibice.com>; 'alan.lebensfeld@lsandspc.com' <alan.lebensfeld@lsandspc.com>; Connot, Mark J. <MConnot@foxrothschild.com>; Tennert, John <jtennert@fennemorelaw.com>
Cc: Joshua Gilmore <JGilmore@baileykennedy.com>; Paul Williams <PWilliams@baileykennedy.com>; Susan Russo <SRusso@baileykennedy.com>
Subject: Seibel adv. Caesars

All,

Attached is a proposed Omnibus Order Granting Motions to Seal/Redact. Specifically, it encompasses the following:

- The Development Entities and Rowen Seibel's ("Seibel") Motion to Seal Certain Exhibits to Opposition to Caesars' Motion for Leave to File First Amended Complaint, which came before the Court on February 12, 2020;
- The Development Entities, Seibel, and Craig Green's ("Green") Motion to Redact Their Motion: (1) For Leave to Take Caesars' NRCP 30(b)(6) Depositions; and (2) To Compel Responses to Written Discovery; and to Seal Exhibits 49 Through 57 to the Appendix of Exhibits Related Thereto, which came before the Court on January 6, 2021;

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- The Development Entities, Seibel, and Green's Motion to Seal Exhibits 2-3 and 5-6 to Their Motion to Compel "Confidential" Designation of Caesars' Financial Documents, which came before the Court on April 9, 2021.

Please let me know if I may apply your e-signature.

Thanks,
Stephanie

Stephanie J. Glantz
Bailey❖Kennedy
8984 Spanish Ridge Avenue
Las Vegas, NV 89148-1302
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(702) 562-8821 (Fax)
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Susan Russo

From: Alan Lebensfeld <Alan.Lebensfeld@lsandspc.com>
Sent: Friday, May 21, 2021 5:35 AM
To: Tennert, John; Stephanie Glantz; Magali Mercera; James Pisanelli; Debra Spinelli; Emily A. Buchwald; Robert A. Ryan; Cinda C. Towne; Diana Barton; Connot, Mark J.
Cc: Joshua Gilmore; Paul Williams; Susan Russo
Subject: RE: Seibel adv. Caesars

Ditto

From: Tennert, John [mailto:jtennert@fennemorelaw.com]
Sent: Thursday, May 20, 2021 8:45 PM
To: Stephanie Glantz; Magali Mercera; James Pisanelli; Debra Spinelli; Emily A. Buchwald; Robert A. Ryan; Cinda C. Towne; Diana Barton; Alan Lebensfeld; Connot, Mark J.
Cc: Joshua Gilmore; Paul Williams; Susan Russo
Subject: RE: Seibel adv. Caesars

Stephanie,
You may apply my e-signature.
Thanks,
John

John D. Tennert III, Director

FENNEMORE.

7800 Rancharrah Parkway, Reno, NV 89511

T: 775.788.2212 | F: 775.788.2213

jtennert@fennemorelaw.com | [View Bio](#)



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From: Stephanie Glantz <SGlantz@baileykennedy.com>
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To: Magali Mercera <mmm@pisanellibice.com>; James Pisanelli <jjp@pisanellibice.com>; Debra Spinelli <dls@pisanellibice.com>; Emily A. Buchwald <eab@pisanellibice.com>; Robert A. Ryan <RR@pisanellibice.com>; Cinda C. Towne <cct@pisanellibice.com>; Diana Barton <DB@pisanellibice.com>; 'alan.lebensfeld@lsandspc.com' <alan.lebensfeld@lsandspc.com>; Connot, Mark J. <MConnot@foxrothschild.com>; Tennert, John <jtennert@fennemorelaw.com>
Cc: Joshua Gilmore <JGilmore@baileykennedy.com>; Paul Williams <PWilliams@baileykennedy.com>; Susan Russo

<SRusso@baileykennedy.com>

Subject: RE: Seibel adv. Caesars

All,

Attached is a clean version with Magali's changes incorporated.

John and Alan, please confirm that I may affix your e-signatures to this version.

Thanks,
Stephanie

Stephanie J. Glantz
Bailey❖Kennedy
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Las Vegas, NV 89148-1302
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Cc: Joshua Gilmore <JGilmore@baileykennedy.com>; Paul Williams <PWilliams@baileykennedy.com>; Susan Russo <SRusso@baileykennedy.com>

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Cc: Joshua Gilmore <JGilmore@baileykennedy.com>; Paul Williams <PWilliams@baileykennedy.com>; Susan Russo <SRusso@baileykennedy.com>

Subject: Seibel adv. Caesars

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Stephanie

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1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Rowen Seibel, Plaintiff(s)

CASE NO: A-17-751759-B

7 vs.

DEPT. NO. Department 16

8 PHWL V LLC, 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 Order was served via the court's electronic eFile system to all
13 recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 5/26/2021

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18 "John Tennert, Esq." .

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Wade Beavers	wbeavers@fclaw.com

TAB 111

**FILED UNDER
SEAL PURSUANT
TO PENDING
MOTION TO SEAL
FILED
CONCURRENTLY
HEREWITH**

TAB 112

Part 1 of 2

**FILED UNDER
SEAL PURSUANT
TO PENDING
MOTION TO SEAL
FILED
CONCURRENTLY
HEREWITH**