

IN THE SUPREME COURT OF THE STATE OF NEVADA

CLARK COUNTY AND GEORGINA
STUART

Petitioners,

v.

EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF
CLARK; THE HONORABLE SUSAN
JOHNSON, DISTRICT JUDGE,

Respondent.

and

STEVE EGGLESTON, an individual,

Real Party-In-Interest.

Electronically Filed
Jan 17 2024 05:04 PM
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO.

DISTRICT COURT CASE NO.

A-16-748919-C

**PETITIONER CLARK COUNTY'S EMERGENCY MOTION FOR LEAVE
TO FILE WRIT APPENDIX DOCUMENTS UNDER SEAL**

COMES NOW Petitioner CLARK COUNTY, by and through its counsel of record of the law firm of OLSON CANNON GORMLEY & STOBERSKI, and hereby seeks emergent leave of this Court to file various Writ Appendix Documents under Seal pursuant to the Nevada Rules for Sealing and Redacting Court Records (SRCR) and NRS 432B.280, and the Eighth Judicial District Court's Protective Order and Orders sealing the same documents that were exhibits to Petitioner's Motion for Summary Judgment and Plaintiff's Opposition thereto. This Motion is made and based upon all the pleadings and papers on file herein,

the attached points and authorities, and any oral argument which the Court may choose to entertain.

Petitioner understands that “[h]istorically, courts have recognized a general right to inspect and copy public records and documents, including judicial records and documents” and a motion to seal documents that are part of the judicial record, or filed in connection with a dispositive motion, as they are here, must meet the “compelling reasons” standard outlined in Kamakana v. City & Cnty. of Honolulu, 447 F.3d 1172, 1178 (9th Cir.2006); Williams v. Nevada Dep't of Corr., 2014 WL 3734287, at *1 (D. Nev. July 29, 2014). A party seeking to seal judicial records must show that “compelling reasons supported by specific factual findings...outweigh the general history of access and the public policies favoring disclosure.” Id. citing Kamakana, 447 F.3d at 1178–79. The court must weigh relevant factors including “the public interest in understanding the judicial process and whether disclosure of the material could result in improper use of the material for scandalous or libelous purposes or infringement upon trade secrets.” Id. citing Pintos v. Pacific Creditors Ass'n, 605 F.3d 665, 679 n. 6 (9th Cir.2010).

Under Rule 3(1) of the Nevada Rules Governing Sealing and Redacting, “[a]ny person may request that the court seal or redact court records for a case.”

Under Rule 3(4), Grounds to Seal or Redact:

the court may order the court files and records in a civil action to be sealed or redacted, provided the court makes and enters written findings that 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... The public interest in privacy or safety interests that outweigh the public interest in open court records include findings that:

- (a) The sealing or redaction is permitted or required by federal or state law;
- (b) The sealing or redaction furthers an order entered under...a protective order entered under NRC 26(c)...;
- (c) The sealing or redaction furthers an order entered in accordance with federal or state laws that serve to protect the public health and safety;
- (d) The redaction includes only restricted personal information contained in the court record;
- ...
- (h) The sealing or redaction is justified or required by another identified compelling circumstance.

Both the United States District Court and this Court have previously recognized that the need to protect the privacy rights of minors, pursuant to Katakana, supra, and/or NRS 432B.280, has qualified as a “compelling reason,” for sealing records in connection with various motions. The Exhibits to Petitioners’ Motion for Summary Judgment and Plaintiff’s Opposition thereto contain such information. Balancing the need for the public’s access to information about minors and the confidentiality of DFS records re minors – the need and statutory mandate to maintain the confidentiality of that information and those records weighs in favor of sealing all the above Exhibits. A Protective Order was entered in this case by the District Court on 12/11/2021. (See Exhibit A). On 10/18/2023, the District Court entered a Notice of Entry of Order and Order Sealing Exhibits A,

C, D, E, F, G, H, I, K, L, M, N, O, P, Q, R, S, T, U, V, W, X, Y, BB, DD, EE, FF, GG, II, KK, LL, PP, RR and SS to Petitioners' Motion for Summary Judgment
 (See Exhibit B) relating to the following Exhibits to Petitioners' Motion for Summary Judgment:

Exhibit	Document	Bates
Exhibit A*	CPS Referral Summary	MSJ001-MSJ004
Exhibit C*	St. Rose Hospital Record	MSJ008
Exhibit D*	Lisa McKay Deposition Pages	MSJ009-MSJ0011
Exhibit E*	CPS Summary	MSJ0012-MSJ0018
Exhibit F*	Montevista Record	MSJ0019
Exhibit G*	Unity Case Notes	MSJ0020-MSJ0039
Exhibit H*	CPS Referral Summary	MSJ0040-MSJ0045
Exhibit I*	Sunrise Hospital Records	MSJ0046-MSJ0047
Exhibit K*	Present Danger Assessments	MSJ0049-MSJ0057
Exhibit L*	Georgina Stuart Deposition Pages	MSJ0058-MSJ0082
Exhibit M*	CPS Brochure	MSJ0083-MSJ0091
Exhibit N*	Present Danger Plan	MSJ0092
Exhibit O*	Alexis Rodriguez Deposition Pages	MSJ0093-MSJ0105
Exhibit P*	Boys Town Referral	MSJ0106-MSJ0107
Exhibit Q*	Lisa Callahan Deposition Pages	MSJ0109-MSJ131
Exhibit R*	Calendars	MSJ0132-MSJ0135
Exhibit S*	Nevada Initial Assessment	MSJ0136-MSJ0146
Exhibit T*	Mary Atteberry Deposition Pages	MSJ0147-MSJ0156
Exhibit U*	Steven Eggleston Deposition Pages	MSJ0157-MSJ0169
Exhibit V*	Emily McFarling Deposition Pages	MSJ0170-MSJ0187
Exhibit W*	Guardianships	MSJ0188-MSJ0189
Exhibit X*	Lisa Callahan Email	MSJ0190
Exhibit Y*	Emails	MSJ0191-MSJ0246
Exhibit BB*	Sommer Kariange Affidavit and Log	MSJ0253-MSJ0256
Exhibit DD*	Left Side File	MSJ0270-MSJ0342
Exhibit EE*	2/2/2015 Substantiation	MSJ0343-MSJ0349

Exhibit FF*	Affidavit of Beverly Brown	MSJ0350-MSJ0352
Exhibit GG*	Clint Holder Deposition Pages	MSJ0353-MSJ0355
Exhibit II*	Risk Assessment	MSJ0361-MSJ0362
Exhibit KK*	SNHD Referral	MSJ0364-MSJ0366
Exhibit LL*	DFS Emails	MSJ0367-MSJ0391
Exhibit PP*	Park Hospital Records	MSJ0404-MSJ0405
Exhibit RR*	Dr. Kimmel's report	MSJ0410-MSJ0419
Exhibit SS*	Dr. Paglini's report	MSJ0420-MSJ0448

On October 17, 2023 Steve Eggleston's counsel filed a Motion to Seal Exhibits to Plaintiff's Opposition to Petitioners' Motion for Summary Judgment and the exhibits were filed under seal.

Exhibit	Document	Bates
1	Pertinent portions of Alexis Rodriguez Deposition	OPP_000001-
2	Pertinent portions of Steve Eggleston Deposition	OPP_000015-
3	Pertinent portions of Dan Smith Deposition	OPP_000031-
4	Pertinent portions of Toby Lester Deposition	OPP_000040-
5	Pertinent portions of Lisa Callahan Deposition	OPP_000047-
6	Pertinent portions of Brian Callahan Deposition	OPP_000062-
7	Pertinent portions of Georgiana Stuart Deposition	OPP_000065-
8	Javonni Henderson, LCSW, LMSW Expert Report	OPP_000086-
9	Email between Stuart and McKay	OPP_000108-
10	Email between Georgina Stuart and Lisa Callahan re: daycare (CC1861)	OPP_000112

11	Email between Georgina Stuart and Lisa Callahan re: substantiation (CC001882-	OPP_000113-
12	Defendants' Fourteenth Supplemental Disclosures	OPP_000120-
13	Affidavit of Anne Marie Abruscato	OPP_000241-
14	Pertinent portions of Clint Holder Deposition	OPP_000244-
15	Pertinent portions of Mary Atteberry Deposition	OPP_000249-
16	Pertinent portions of Emily McFarling Deposition	OPP_000263-
17	Dr. John Paglini Rebuttal Expert Report	OPP_000267-
18	Emily McFarling March 31, 2015 Correspondence to the Callahans	OPP_000306-
19	Order for Limited Remand	OPP_000308-
20	Emails between Attorney Shabazz and Stuart	OPP_00031

Pursuant to the above Orders, NRS 432B.280 and Kamakhana, Petitioners respectfully request that it be granted leave to file the following Exhibits under seal in their Appendix to their Emergency Writ.

Petitioners are providing Plaintiff and the Court with the above Exhibits for this Court to review and request this Court seal all the above Exhibits.

DATED this 17th day of January, 2024.

/s/ Felicia Galati, Esq.

FELICIA GALATI, ESQ.

Nevada Bar No. 007341

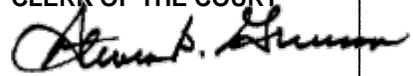
STEPHANIE A. BARKER, ESQ.

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and Georgina Stuart

EXHIBIT “A”



1 **NOEJ**
2 FELICIA GALATI, ESQ.
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10 Attorneys for Defendants
11 CLARK COUNTY and GEORGINA STUART

8 DISTRICT COURT
9 CLARK COUNTY, NEVADA

10 STEVE EGGLESTON,
11
12 Plaintiff,

13 v.

14 GEORGINA STUART; CLARK COUNTY,
15 NEVADA; LISA CALLAHAN; BRIAN
16 CALLAHAN; AND DOES I THROUGH 100,
17 INCLUSIVE,
18 Defendants.

CASE NO. A-16-748919-C
DEPT. NO. IX

**NOTICE OF ENTRY OF
STIPULATION AND PROTECTIVE
ORDER**

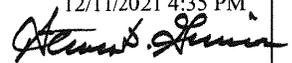
18 **NOTICE IS GIVEN** that a Stipulation and Protective Order was entered on the
19 11th day of December, 2021. A copy of which is attached hereto.

20 DATED this 13th day of December, 2021.

21 OLSON CANNON GORMLEY
22 & STOBERSKI

23 */s/ Felicia Galati*

24 _____
25 FELICIA GALATI, ESQ.
26 Nevada Bar No. 7341
27 9950 West Cheyenne Avenue
28 Las Vegas, NV 89129
Attorneys for Defendants
CLARK COUNTY and
GEORGINA STUART

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CLERK OF THE COURT

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10 CLARK COUNTY and
11 GEORGINA STUART

12 DISTRICT COURT
13 CLARK COUNTY, NEVADA

14 STEVE EGGLESTON,

CASE NO. A-16-748919-C

DEPT. NO. XXIII

15 Plaintiff,

16 v.

17 GEORGINA STUART; CLARK COUNTY,
18 NEVADA; LISA CALLAHAN; BRIAN
19 CALLAHAN; AND DOES I THROUGH 100,
20 INCLUSIVE,

21 Defendants.

22 **STIPULATION AND PROTECTIVE ORDER**

23 1. Plaintiff and Defendants (collectively "Parties"), through their respective
24 counsel, and subject to the Court's approval, hereby stipulate and agree as follows, pursuant to
25 NRCP 26(c), with respect to the disclosure of Confidential Information.

26 2. The Parties to this action submit this Stipulation and Protective Order
27 (hereinafter "Order") solely for the purpose of facilitating the exchange of documents and
28 information between the Parties in this action without involving the Court unnecessarily in the
process. Nothing in this Order nor the production of any information or documents under the

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1 terms of this Order nor any proceedings pursuant to this Order shall be deemed to have the
2 effect of an admission or waiver by any Party or of altering the confidentiality or non-
3 confidentiality of any such document or information or altering any existing obligation of any
4 Party or absence thereof.

5 **PROCEDURES REGARDING CONFIDENTIAL INFORMATION**

6 3. The Parties define “DFS case records” as all documents and information,
7 regardless of format which are in the custody of County Defendants relating to DFS
8 investigation, custody, and placement, including, but not limited to, documents relating to all
9 Plaintiff’s family, kin placement, education, mental health, health services, and court
10 proceedings. The Parties acknowledge that DFS case records and the files and documents of
11 any child who has had contact with DFS contain sensitive information that is generally
12 protected from disclosure pursuant to federal and state law, including without limitation:

- 13 (a) Information that identifies by name or address, or could reasonably lead to the
14 disclosure of the name or address of any applicant for or recipient of child welfare,
15 foster care, or adoption assistance services [45 C.F.R. 1355.21];
- 16 (b) The names and addresses of applicants for and recipients of child welfare,
17 foster care, or adoption assistance services and the amounts of financial assistance
18 provided to them [45 C.F.R. 205.50];
- 19 (c) Information related to the social and economic conditions or circumstances of
20 particular individual applicants for or recipients of child welfare, foster care, or
21 adoption services [45 C.F.R. 205.50];
- 22 (d) Agency evaluations of information about particular individual applicants for or
23 recipients of child welfare, foster care, or adoption assistance services [45 C.F.R.
24 205.50];
- 25 (e) Medical data concerning particular individual applicants for or recipients of
26 child welfare, foster care, or adoption assistance services [45 C.F.R. 205.50]; and
- 27 (f) All information and records of child abuse reports obtained in investigating
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1 reports of child abuse and neglect, including all information obtained in investigating
2 reports of child abuse and neglect and related proceedings [45 C.F.R. 1340.14; Nev.
3 Rev. Stat. Ann. § 432B.280, 432B.290].

4 The Parties also acknowledge that all files or documents of any child who has received child
5 welfare services and/or been or is in Department of Family Services custody shall come within
6 the provisions and protections of this Order.

7 4. DFS case records shall be deemed to be Confidential Information pursuant to
8 this Order and Defendants shall label them as Confidential upon production.

9 5. A Party may also label as “Confidential” any discovery that is served or
10 produced in this litigation (including subpoenas and deposition testimony), if the marking
11 Party believes that the information contained in such discovery qualifies for protection under
12 standards developed under NRCP 26(c) or state or federal law, including the right to privacy.
13 Such information shall be deemed to be Confidential Information pursuant to this Order.
14 The fact that a document is stamped “Confidential” by one Party shall not be construed as an
15 admission by any other Party that such document is confidential, nor shall it limit or preclude
16 the right of any Party to object to the “Confidential” designation and to file any appropriate
17 motion(s) to determine the propriety of such designation. If the producing Party inadvertently
18 fails to stamp or otherwise appropriately designate or list certain documents, material, or
19 information as “Confidential” upon their production or disclosure, such inadvertent failure to
20 designate shall not constitute nor be deemed a waiver of a subsequent claim of protected
21 treatment under this Order.

22 Any Party may contest a designation of “Confidential” by serving a written objection
23 (by letter to the designating Party) to the Confidentiality designation at any time up to the
24 discovery cut-off including any continuance thereof. Upon service of such objection, the
25 Parties shall make a good faith effort to resolve the issue informally. If that effort fails, the
26 confidentiality designation shall expire unless, within three weeks of service of the objection,
27 or such additional time as may be agreed upon the Parties, the Party seeking confidentiality
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1 applies to the Court or Magistrate Judge for an order designating the document or information
2 confidential. If such an application is made, the document or other information marked
3 “Confidential” which is in dispute shall remain “Confidential,” as the case may be, until the
4 dispute is resolved by and between or among the Parties and so confirmed in writing or, if
5 necessary, until order of the Court or any District Court Judge. On any such application, the
6 proponent of confidentiality shall have the burden of showing, by a preponderance of the
7 evidence, good cause for the claimed protection.

8 6. Confidential Information shall only be used for purpose of prosecution,
9 defense, or settlement of this action, and for no other purpose.

10 7. Confidential Information may be disclosed or made available only to the Court;
11 to counsel for a Party (including paralegal, clerical, and secretarial staff employed by such
12 counsel), and to the “qualified persons” designated below:

- 13 (a) a Party, or an officer, director, agent, or employee of a Party deemed necessary
14 by counsel to aid in the prosecution, defense, or settlement of this action;
15 (b) experts or consultants (and their clerical staff) consulted and/or retained by
16 such counsel to assist in the prosecution, defense, or settlement of this action;
17 (c) court reporter(s) employed in this action; or
18 (d) a witness at any deposition or court proceeding in this action.

19 8. Any person other than a Party, counsel for a Party, or a direct employee of such
20 counsel, having access to information pursuant to paragraph 8, shall be provided a copy of this
21 Order by the Party providing access to the information. Such persons shall be bound by this
22 Order and shall not disclose the information to any persons not authorized under state or
23 federal law or order of this Court to receive such information. Furthermore, any such person
24 shall sign a copy of the Statement of Confidentiality attached hereto and made a part hereof as
25 Exhibit A, prior to being furnished with any such information.

26 9. All documents meeting the definition of Confidential Information that are
27 produced in this case shall be clearly labeled or stamped “Confidential” prior to production.
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1 10. In connection with proceedings in this action, testimony taken at a deposition,
2 hearing, or trial relating to Confidential Information or disclosing the identities of any other
3 child who has been or is in DFS custody, or any individual not a named Party to this action,
4 may be designated as Confidential Information by making a statement to that effect on the
5 record at the deposition or other proceeding. Arrangements shall be made with the court
6 reporter taking and transcribing such proceeding to label confidential portions of the transcript
7 as containing Confidential Information.

8 11. Any Party's inadvertent or unintentional failure to designate protected
9 information shall not be deemed a waiver in whole or in part of that Party's claim of
10 confidentiality, as long as the disclosing Party notifies all Parties in writing that such protected
11 information constitutes confidential information within 7 days after learning that the protected
12 information was inadvertently or unintentionally produced without an appropriate
13 confidentiality designation.

14 12. Clawback Provision - The inadvertent disclosure or production of any
15 information or document that is subject to an objection on the basis of attorney-client, work
16 product and/or any other privileges or that is otherwise confidential, including pursuant to any
17 Nevada Revised Statute, Nevada Administrative Code or other law, will not be deemed to
18 waive a Party's claim to its privileged or protected nature or estop that Party or the privilege
19 holder from designating the information or document as privileged and/or confidential at a
20 later date. Any Party receiving any such information or document shall return it upon request
21 from the producing Party. Upon receiving such a request as to specific information or
22 documents, the receiving Party shall return the information or documents to the producing
23 Party within five (5) business days, regardless of whether the receiving Party agrees with the
24 claim of privilege or confidentiality. Any Party may contest the claim of privilege or
25 confidentiality by serving a written objection by letter to the claiming Party at any time up to
26 the discovery cut-off including any continuance thereof. Upon service of such objection, the
27 Parties shall make a good faith effort to resolve the issue informally. If that effort fails, the
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1 Party objecting to the privilege or confidentiality can apply to the Court or Discovery
2 Commissioner for a determination of the issue. If such an application is made, the document
3 or other information which is in dispute shall remain “Confidential,” as the case may be, until
4 the dispute is resolved by and between or among the Parties and so confirmed in writing or, if
5 necessary, until order of the Court or any Discovery Commissioner. On any such application,
6 the proponent of privilege or confidentiality shall have the burden of showing, by a
7 preponderance of the evidence, good cause for the claimed protection.

8
9 13. The terms of this Stipulated Protective Order apply, without limitation to all
10 documents and information exchanged between the Parties in the course of this litigation,
11 whether or not such documents and/or information were exchanged prior to the entry of this
12 Order and/or were designated as “Confidential.” This provision allows a Party to designate a
13 previously produced document as “Confidential.”

14 14. If any Party or non-Party includes in papers to be filed with the Court: (i)
15 documents designated as containing Confidential Information, (ii) any portion of a deposition
16 transcript designated as containing Confidential Information, (iii) or information derived from
17 confidential documents or deposition testimony, such papers, or the confidential portion
18 thereof, shall be filed under seal. The Parties will comply with the Nevada Rules Governing
19 Sealing and Redacting Court Records.

20 15. In all documents that are made part of the public record (unless under seal) and
21 in all references in open court, when referring to individual children or families, or other
22 persons whose names or other identifying information is contained in DFS case records, the
23 Parties shall use initials agreed to by the Parties.

24 16. This Order does not affect access to Confidential Information by individuals,
25 including employees of Clark County or the State of Nevada, who are otherwise authorized
26 under state law or regulation to have such access.

27 17. The Parties acknowledge that DFS information and material, which are the
28 subject of this Confidentiality Order, contain sensitive information that is generally protected

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from disclosure by Nevada Statute and Administrative Code, and that all such information should be and hereby is deemed confidential and may not be discussed with or disclosed, either orally or in writing, to anyone, including but not limited to the news or publication media in any format, except in the strict accordance with the provisions of this Confidentiality Order. This Order does not apply to policies and procedures of DFS which are otherwise deemed public record pursuant to Nev. Rev. Stat. 179A.110, Nev. Rev. Stat. 29.010, Nev. Rev. Stat. 432B.290(2) and Nev. Rev. Stat. 432B.407. This Order does not prevent a Party from disseminating the identical information covered by the protective order as long as the information is gained through means independent of the Court's processes and its disclosure is not otherwise prohibited by Statute, Code or Regulation. This Order shall be without prejudice to the right of the Parties (i) to bring before the Court at any time the question of whether any particular document or information is, in fact, Confidential or whether its use should be restricted in any manner whatsoever; or (ii) to present a motion to the Court for a separate protective order as to any particular document or information, including restrictions differing from those specified herein. This Order shall not be deemed to prejudice the Parties in any way in any future application for modification of this Order.

18. This Order shall be without prejudice to any Party to claim that a document that a Party marked as containing Confidential Information is also protected by the attorney-client privilege, work product doctrine, or any other privilege or limitation recognized under state or federal law. Determinations of confidentiality and privilege are separate, and nothing in this Order constitutes a waiver of privilege.

19. At the conclusion of this case, all discovery material made confidential pursuant to this Order, or another court order, all documents reflecting such material, and all copies thereof (including without limitation, copies provided to testifying or consulting experts or consultants) shall be returned to the person or Party that produced the confidential material, or, in the alternative, destroyed and certified in writing to the person or Party that produced the confidential material to have been destroyed. Notwithstanding the foregoing, counsel for

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Plaintiff may retain, until the expiration of the statute of limitations applicable to attorney malpractice, including any period for which the statute may be tolled, one copy of the named Plaintiff's case records, including the confidential material contained therein, and one copy of any attorney work product reflecting Confidential Information, provided that such case records and attorney work product is prominently marked with the statement:

CONFIDENTIAL

This envelope contains documents that are subject to a Protective Order entered by the Court in this action governing the use of confidential discovery material.

or some substantially similar statement. The provisions of this Order shall continue to apply to all confidential materials not returned or destroyed in accordance with this paragraph. After the expiration of the statute of limitations applicable to attorney malpractice, including any period for which the statute may be tolled, Plaintiff's counsel shall return or destroy all confidential case records in accordance with the terms of this paragraph.

20. The Parties acknowledge that the Parties have stipulated to the terms of this Confidentiality Stipulation and Order, intending that it shall govern disclosures of material from the records of CCDFS, unless and until such time as the Court modifies this Order. Nothing contained herein is intended to limit the Parties' access to the Court or their ability to seek to modify this Order.

Dated this 10th day of December, 2021. Dated this 10th day of December, 2021.

CLARK HILL LLP

/s/ Paola M. Armeni

OLSON CANNON GORMLEY
& STOBERSKI

/s/ Felicia Galati

By: _____
Paola M. Armeni, Esq.
3800 Howard Hughes Parkway
Las Vegas, NV 89169
Attorney for Plaintiff
STEVE EGGLESTON

By: _____
Felicia Galati, Esq.
9950 West Cheyenne Avenue
Las Vegas, NV 89129
Attorneys for Defendants
CLARK COUNTY and
GEORGINA STUART

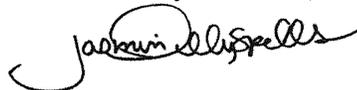
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ORDER

IT IS HEREBY ORDERED, ADJUDGED and DECREED that, the records of the Clark County Department of Family Services (“CCDFS”), which may be discoverable in Eggleston, et al. v. Clark County, et al., Eighth Judicial District Court Case No. A-16-748919-C, are deemed Confidential to this litigation, and may be released and disclosed only in accordance with the terms and provisions of the foregoing Stipulation, said terms and provisions being incorporated into this Order by this reference as though fully set forth herein.

IT IS SO ORDERED this ____ day of _____ Dated this ²⁰²¹ 11th day of December, 2021



DISTRICT COURT JUDGE
47B 182 BF59 66B9
Jasmin Lilly-Spells
District Court Judge

Submitted by:

OLSON CANNON GORMLEY
& STOBERSKI

/s/ Felicia Galati

By: _____

Felicia Galati, Esq.
9950 West Cheyenne Avenue
Las Vegas, NV 89129
Attorneys for Defendants
CLARK COUNTY and GEORGINA STUART

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Exhibit A

STATEMENT OF CONFIDENTIALITY

By signing this document, I hereby certify that I have read the Confidentiality Order entered by the Court in Eggleston, et al. v. Clark County, et al., Eighth Judicial District Court Case No. A-16-748919-C, on _____, 20 _____. I understand this Order and agree to abide by its terms by not disclosing confidential information to anyone other than counsel, employees or clerical staff subject to this order, except as required by lawful judicial process.

Signature

Date

Print Name/Title

Claudia Morrill

From: Felicia Galati
Sent: Friday, December 10, 2021 2:31 PM
To: Claudia Morrill
Subject: FW: Eggleston - Protective Order

Felicia Galati, Esq., Shareholder
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FX: 702-383-0701

Privileged and Confidential

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From: Armeni, Paola M. <parmeni@ClarkHill.com>
Sent: Friday, December 10, 2021 1:46 PM
To: Felicia Galati <fgalati@ocgas.com>
Subject: RE: Eggleston - Protective Order

Thank you. You have permission to /s/ on my behalf.

Thanks,
Paola

Paola M. Armeni

Member

Clark Hill LLP

3800 Howard Hughes Parkway, Las Vegas, NV 89169
(702) 697-7509(office) | (702) 862-8400(fax)
parmeni@ClarkHill.com | www.clarkhill.com

From: Felicia Galati <fgalati@ocgas.com>
Sent: Friday, December 10, 2021 12:07 PM
To: Armeni, Paola M. <parmeni@ClarkHill.com>
Subject: RE: Eggleston - Protective Order

[External Message]

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CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Steve Eggleston, Plaintiff(s)	CASE NO: A-16-748919-C
vs.	DEPT. NO. Department 23
Georgina Stuart, Defendant(s)	

AUTOMATED CERTIFICATE OF SERVICE

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

Service Date: 12/11/2021

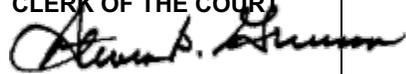
- | | |
|--|----------------------------------|
| "Ofelia Monje, Deputy District Attorney" . | Ofelia.Monje@clarkcountyda.com |
| Afeni Banks . | Afeni.Banks@clarkcountyda.com |
| Felicia Galati | fgalati@ocgas.com |
| Christine Wirt | christine.wirt@clarkcountyda.com |
| Renee Albert | renee.albert@clarkcountyda.com |
| Steve Eggleston | theeggman411@gmail.com |
| Tanya Bain | tbain@clarkhill.com |
| Steve Eggleston | steve@steveegglestonwrites.com |
| Paola Armeni | parmeni@clarkhill.com |
| Gia Marina | gmarina@clarkhill.com |
| Stacy Ewing | sewing@clarkhill.com |

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Brittany Falconi

media@ournevadajudges.com

EXHIBIT “B”



1 **NEOJ**
2 FELICIA GALATI, ESQ.
3 Nevada Bar No. 007341
4 **OLSON CANNON GORMLEY & STOBERSKI**
5 9950 West Cheyenne Avenue
6 Las Vegas, NV 89129
7 Phone: 702-384-4012
8 Fax: 702-383-0701
9 fgalati@ocgas.com
10 Attorneys for Defendants
11 **CLARK COUNTY and GEORGINA STUART**

12 **DISTRICT COURT**
13 **CLARK COUNTY, NEVADA**

14 **STEVE EGGLESTON,**
15 **Plaintiff,**

16 vs.

17 **GEORGINA STUART; CLARK COUNTY,**
18 **NEVADA; LISA CALLAHAN; BRIAN**
19 **CALLAHAN; AND DOES I THROUGH**
20 **100, INCLUSIVE,**

21 **Defendants.**

22 **CASE NO. A-16-748919-C**
23 **DEPT. NO. 22**

24 **NOTICE OF ENTRY OF ORDER**
25 **GRANTING DEFENDANT CLARK**
26 **COUNTY AND GEORGINA STUART'S**
27 **MOTION FOR LEAVE TO FILE**
28 **EXHIBITS TO MOTION FOR**
29 **SUMMARY JUDGMENT UNDER SEAL**

30 **Date: October 17, 2023**

31 PLEASE TAKE NOTICE that an Order Granting Defendant Clark County and Georgina

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Law Offices of
OLSON CANNON GORMLEY & STOBERSKI
A Professional Corporation
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
(702) 384-4012 Fax (702) 383-0701

1 Stuart's Motion for Leave to File Exhibits to Motion for Summary Judgment Under Seal was
2 entered on October 18, 2023, a copy of which is attached hereto.

3 DATED this 18th day of October, 2023.

4 OLSON CANNON GORMLEY & STOBERSKI

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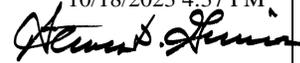
7
8 FELICIA GALATI, ESQ.
9 Nevada Bar No. 7341
10 9950 West Cheyenne Avenue
11 Las Vegas, NV 89129
12 Attorney for Defendants
13 CLARK COUNTY and GEORGINA STUART

14 **CERTIFICATE OF SERVICE**

15 On the 18th day of October, 2023, the undersigned, an employee of Olson, Cannon,
16 Gormley & Stoberski, hereby served a true copy of **NOTICE OF ENTRY OF ORDER**
17 **GRANTING DEFENDANT CLARK COUNTY AND GEORGINA STUART'S MOTION**
18 **FOR LEAVE TO FILE EXHIBITS TO MOTION FOR SUMMARY JUDGMENT**
19 **UNDER SEAL** to the parties listed below via [] Odyssey Electronic Filing and Service
20 pursuant to NEFR 9 [] hand delivery [] overnight delivery [] fax [] fax and mail [] mailing
21 by depositing with the U.S. mail in Las Vegas, Nevada, enclosed in a sealed envelope with first
22 class postage prepaid, addressed as follows:

23 Paola M. Armeni, Esq.
24 William D. Schuller, Esq.
25 CLARK HILL, LLP.
26 1700 S. Pavilion Center Dr. Suite 500
27 Las Vegas, Nevada 89135
28 Attorneys for Plaintiff

/s/ Lisa Rico
An employee of Olson Cannon Gormley & Stoberski



CLERK OF THE COURT

1 **OGM**
2 FELICIA GALATI, ESQ.
3 Nevada Bar No. 007341
4 OLSON CANNON GORMLEY & STOBERSKI
5 9950 West Cheyenne Avenue
6 Las Vegas, NV 89129
7 Phone: 702-384-4012
8 Fax: 702-383-0701
9 fgalati@ocgas.com
10 Attorneys for Defendants
11 CLARK COUNTY and GEORGINA STUART

12 **DISTRICT COURT**
13 **CLARK COUNTY, NEVADA**

14 STEVE EGGLESTON,

15 Plaintiff,

16 vs.

17 GEORGINA STUART; CLARK COUNTY,
18 NEVADA; LISA CALLAHAN; BRIAN
19 CALLAHAN; AND DOES I THROUGH
20 100, INCLUSIVE,

21 Defendants.

CASE NO. A-16-748919-C
DEPT. NO. 22

**ORDER GRANTING DEFENDANT
CLARK COUNTY AND GEORGINA
STUART'S MOTION FOR LEAVE TO
FILE EXHIBITS TO MOTION FOR
SUMMARY JUDGMENT UNDER SEAL**

Date: October 17, 2023

22 This matter came before the Court in Chambers on October 17, 2023, on Defendant
23 Clark County and Georgina Stuart's Motion for Leave to File Exhibits to Motion for
24 Summary Judgment Under Seal, filed September 29, 2023. The Court noted the Motion
25 was served upon the parties, no Opposition was filed, and found good cause therefor:

26 ///

27 ///

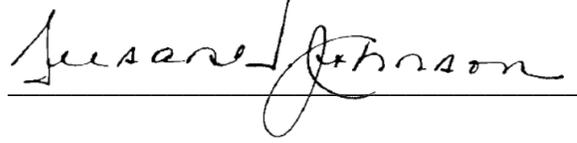
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Law Offices of
OLSON CANNON GORMLEY & STOBERSKI
A Professional Corporation
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
(702) 384-4012 Fax (702) 383-0701

1 IT IS HEREBY ORDERED that the Motion is GRANTED pursuant to EDCR
2 2.20(e). The matter scheduled to be heard Tuesday, November 7, 2023 at 8:30 a.m. is
3 VACATED pursuant to EDCR 2.23.

4 **Dated this 18th day of October, 2023**

5 
6 _____

7
8 **8CE 710 BA9C DE48**
9 **Susan Johnson**
10 **District Court Judge**

11 Respectfully Submitted By:

12 **OLSON CANNON GORMLEY & STOBERSKI**

13 
14 _____

15 **FELICIA GALATI, ESQ.**
16 Nevada Bar No. 007341
17 9950 West Cheyenne Avenue
18 Las Vegas, Nevada 89129
19 Attorneys for Defendants
20 **CLARK COUNTY and GEORGINA STUART**

21 Approved as to Form and Content by:

22 **CLARK HILL, LLP**

23 /s/ William D. Schuller, Esq.
24 **PAOLA M. ARMENI, ESQ.**
25 Nevada Bar No. 008537
26 **WILLIAM D. SCHULLER, ESQ.**
27 Nevada Bar No. 011271
28 1700 S. Pavilion Center Dr. Suite 500
Las Vegas, Nevada 89135
Attorneys for Plaintiff
STEVE EGGLESTON

Lisa Rico

From: Schuller, William D. <wschuller@clarkhill.com>
Sent: Wednesday, October 18, 2023 8:40 AM
To: Lisa Rico; Armeni, Paola M.
Cc: Bain, Tanya; Reyes, Clarissa; Felicia Galati
Subject: RE: Eggleston vs. Stuart; Proposed Order

Thanks Lisa. You may affix my e-signature.

William D. Schuller

Senior Attorney

Clark Hill PLC

1700 S. Pavilion Center Drive, Ste. 500, Las Vegas, NV 89135
(702) 697-7550 (office) | (702) 778-9709 (fax)
wschuller@clarkhill.com | www.clarkhill.com

From: Lisa Rico <lrico@ocgas.com>
Sent: Tuesday, October 17, 2023 5:19 PM
To: Armeni, Paola M. <parmeni@ClarkHill.com>; Schuller, William D. <wschuller@clarkhill.com>
Cc: Bain, Tanya <tbain@ClarkHill.com>; Reyes, Clarissa <creyes@clarkhill.com>; Felicia Galati <fgalati@ocgas.com>
Subject: Eggleston vs. Stuart; Proposed Order

[External Message]

Attached is a draft Order Granting Motion for your review. Can you please let me know if I can esign your signature on the Order? Thanks!

Lisa Rico
Paralegal & Legal Assistant to Felicia Galati, Esq.
and Legal Assistant to Alexander Adrian, Esq.
Olson, Cannon, Gormley & Stoberski
9950 W. Cheyenne Ave.
Las Vegas, NV 89129
(702) 384-4012
lrico@ocgas.com

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

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6 Steve Eggleston, Plaintiff(s)

CASE NO: A-16-748919-C

7 vs.

DEPT. NO. Department 22

8 Georgina Stuart, 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 Granting Motion 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: 10/18/2023

15 Zachary Takos	zach@takoslaw.com
16 Felicia Galati	fgalati@ocgas.com
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18 Tanya Bain	tbain@clarkhill.com
19 Paola Armeni	parmeni@clarkhill.com
20 Steve Eggleston	steve@steveegglestonwrites.com
21 Theresa Mains	Theresa@TheresaMainsPA.com
22 Clarissa Reyes	creyes@clarkhill.com
23 William Schuller	wschuller@clarkhill.com
24 Steven Hart	steven@takoslaw.com
25 Amber Henrie	amber@takoslaw.com

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Dustin Clark

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