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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 RAYMOND G. SCHREIBER REVOCABLE) **Case No.: 2:05-cv-0574-LDG-PAL**
13 TRUST and ROBERT SCHREIBER, an)
14 individual residing in Ohio,)
15)
16 Plaintiffs,) **MOTION FOR RELEASE OF FILM**
17) **AND TAPE**

18 vs.)

19 THE ESTATE OF ROBERT C. KNIEVEL a/k/a)
20 EVEL KNIEVEL; KELLY KNIEVEL, an)
21 individual residing in Nevada; K AND K)
22 PROMOTIONS, INC., a Nevada Corporation;)
23 and CONANT INVESTMENT COMPANY,)
24 LLC, a Nevada Limited Liability Company,)

25 Defendants.)

26 Defendants, THE ESTATE OF ROBERT C. KNIEVEL a/k/a EVEL KNIEVEL,
27 KELLY KNIEVEL, K AND K PROMOTIONS, INC., and CONANT INVESTMENT
28 COMPANY, LLC (together “Defendants”), by and through their attorneys, Borghese Legal,
Ltd., hereby move that the Film and Tape currently being held at the Iron Mountain Storage
Facility be released to K and K Promotions, Inc. (“K&K”).

29 **MEMORANDUM OF POINTS AND AUTHORITIES**

30 On or about September 17, 2009, this Court ordered that (i) approximately 118 reels of
31 film contained within approximately 102 reel canisters and (ii) three Betacam tapes (“Film and
32 Tape”) be placed at the following location: Iron Mountain, 2942 Brooks Park Drive, North Las
33 Vegas, 89030 (“Storage Facility”) (See Docket #209).

34 The Court further ordered that none of the Film and Tape be removed from the Storage

1 Facility without an order from this Court or stipulation by the parties.

2 On November 1, 2013 this Court entered a final judgment in this case (“Judgment”) (*See*
3 Docket #233). One of the rulings in the Judgment is that K&K be granted equal access to the
4 Film and Tape (*See* Judgment at 1(d)).

5 It is requested that this Court enter an order allowing K and K Promotions, Inc. to
6 remove the Film and Tape from the Storage Facility. This will avoid additional fees and costs
7 incurred from the Storage Facility charges and fulfill the equal access granted to K&K in the
8 Judgment. It is anticipated that after K&K has temporary possession of the Film and Tape the
9 parties will be able to work out a reasonable system of equal access to the Film and Tape.

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11 DATED this 7th day of November, 2013.

12 Respectf

ully Submitted,

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BORGHESE LEGAL, LTD.

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ORDER

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21 SO ORDERED.

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DATED this 27th day of November, 2013.

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Lloyd D. George
Sr. U.S. District Judge

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