

1 **CHRISTENSEN JAMES & MARTIN**
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 11 Attorneys for Plaintiffs

7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 Painters Joint Committee, through its designated
 10 fiduciaries, John Smirk and Thomas Pfundstein;
 11 IUPAT Industry Pension Fund; Employee Painters'
 12 Trust; Painters Vacation-Holiday Savings Fund;
 13 Painters Joint Apprenticeship and Journeyman
 14 Training Trust; Painters Industry Promotion Fund;
 15 Painters JCIP Fund; Painters Organizing Fund; and
 16 Painters Labor Management Contract Fund,

Case No. 10-cv-1385-JCM-PAL

STIPULATION AND ORDER
 PROTECTING CONFIDENTIAL
 SETTLEMENT INFORMATION

13 Plaintiffs,

14 vs.

15 J.L. Wallco, Inc. dba Wallternatives, a Nevada
 16 corporation; Genuine Quality Coatings, Inc., a
 17 Nevada Corporation; Sunrise Painting/RCH, Inc., a
 18 Nevada Corporation; Richard Rejan Nieto,
 19 individually and dba Genuine Quality Coatings,
 20 Inc.; Claudia Bammer aka Claudia Nieto, an
 individual; Richard Raoul Nieto, an individual;
 Shrader and Martinez Construction Inc., a Nevada
 corporation; Merchants Bonding Company; Great
 American Capital aka Great American Capitol , a
 Nevada Corporation.

21 Defendants.

22 The undersigned parties, hereby stipulate as follows:

- 23 1. Shrader and Martinez Construction, Inc.; Richard Raoul Nieto; and Claudia Bammer
 24 (collectively "Defendants") have requested information from the Plaintiffs showing how
 25 much money from specific parties has been received in this litigation by the Plaintiffs
 26 through settlement;
- 27 2. The Plaintiffs are willing to provide the information but desire a protective order from the
 28 Court to ensure that there are no violations of any confidentiality provisions that may
 exist in settlement documents and that there are no violations of any confidentially
 expectations that the settling parties may have had;

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- 1 3. The Defendants therefore agree that they will hold in strict confidence and not share,
2 disseminate, or make available any settlement information between the Plaintiffs and any
3 other party that may be disclosed to them now or in the future;
4 4. Unless disclosure is ordered by a court, the Defendants further agree that they will hold
5 the Plaintiffs completely harmless (including but not limited to actual damages, incidental
6 damages, legal fees and costs) from any intentional or negligent disclosure of the
7 confidential information that results from their conduct or lack thereof.

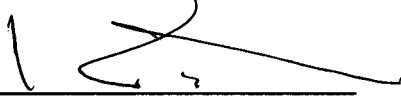
8 Dated this 4th day of ^{April} ~~March~~, 2014.


9 CHRISTENSEN, JAMES & MARTIN

PICHARD PARRY KOLBE

10 By: Evan L. James
11 Evan L. James, Esq.
12 Nevada Bar No. 7760
13 7440 W Sahara Ave.
14 Las Vegas, NV 89117
15 Counsel for Plaintiffs


By: Zachariah B. Parry
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14 
15 Richard Nieto
16 6943 Cedar Basin Ave.
17 Las Vegas, NV 89142
18 In Proper Person


15 Claudia Bammer
16 6943 Cedar Basin Ave.
17 Las Vegas, NV 89142
18 In Proper Person

18 ORDER

19 IT IS SO ORDERED.

20 United States District Court Magistrate Judge
21 
22 Peggy A. Leen

23 Submitted by:
24 CHRISTENSEN, JAMES & MARTIN

Dated: April 9, 2014

25 By: Evan L. James
26 Evan L. James, Esq.
27 Nevada Bar No. 7760
28 7440 W Sahara Ave.
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