

THE LAW OFFICE OF KAREN H. ROSS  
2275 CORPORATE CIRCLE | SUITE 160  
HENDERSON | NEVADA 89074  
TEL: (702) 485-4152 | FAX: (702) 485-4125

1 KAREN H. ROSS, ESQ.  
2 Nevada Bar No. 9299  
3 *The Law Office of Karen H. Ross*  
4 2275 Corporate Circle, Suite 160  
5 Henderson, NV 89074  
6 Tel (702) 485-4152  
7 Fax (702) 485-4125  
8 karenross@khrlawgroup.com  
9 *Attorney for Defendants,*  
10 *Accident Injury Medical Center*  
11 *and Sebastian P. Balle, M.D.*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

10 ALLSTATE INSURANCE COMPANY,  
11 ALLSTATE PROPERTY & CASUALTY  
12 INSURANCE COMPANY, ALLSTATE  
13 INDEMNITY COMPANY, and ALLSTATE  
14 FIRE & CASUALTY INSURANCE  
15 COMPANY,

Plaintiff,

vs.

16 PETER MARIO BALLE, D.C., SEBASTIAN P.  
17 BALLE, M.D., ARTHUR ROSSI, D.C.,  
18 RICHARD CHARETTE, ELITER ATL, LLC.,  
19 ACCIDENT INJURY MEDICAL CENTER,  
20 INC, ACCIDENT TRIAL LAWYERS, LLC.,  
21 ACCIDENT TRIAL LAWYERS, INC., REAL  
22 TIME MARKETING, INC., ANDREW  
23 TAYLOR, RAMSEY AND ASSOCIATES,  
24 INC., and DENNIS RAMSEY,

Defendants.

CIVIL CASE NO.: 2:10-CV-02205-KJD-GWF

**STIPULATION AND PROTECTIVE  
ORDER REGARDING DEFENDANTS'  
CONFIDENTIAL FINANCIAL  
DOCUMENTS**

**STIPULATION AND PROTECTIVE ORDER REGARDING DEFENDANTS'  
CONFIDENTIAL FINANCIAL DOCUMENTS**

The parties to the above-entitled action, by and through their attorneys or record herein,  
hereby agree as follows:

1. That good cause exists for the parties to enter into a Protective Order concerning the  
Defendants confidential financial documents, which may be provided by the Defendants to

1 the Plaintiffs through discovery efforts in this matter.

2 2. A protective Order is necessary because Defendants are of the good faith belief that these  
3 financial documents are confidential (In accordance with FRCP 26 (c)(1)(a)), forbidding  
4 Plaintiffs from disclosing discovery.

5 3. As such, the parties hereby stipulate that the following measures be implemented in  
6 connection with any financial documents belonging to the Defendants, that might be  
7 produced by the Defendants to the Plaintiffs pursuant to legitimate discovery requests in  
8 this matter.

9  
10 a. No party or his agent shall use any such documents for any purpose not related to the  
11 present litigation. In this regard, the parties agree not to disclose these documents to  
12 anyone other than their lawyers and their agents, experts, and the Court and/or the  
13 jury as the Court deems proper, and strictly for purposes related to the present  
14 litigation.

15  
16 b. That whenever any such financial documents obtained from Plaintiffs are used in any  
17 pleading or exhibit filed with the Court, the party filing such information will do so in  
18 a pleading wherein such pleading has been requested to be filed under seal.

19  
20 c. Upon the completion of this litigation, the parties agree that all such documents  
21 obtained from the Defendants will be returned to the Defendants.

22  
23 d. Each page of the documents that are subject to this Protective Order are to be labeled  
24 as being "Subject to Federal Court Protective Order, Case No. 2:10-CV-02205-APG-  
NJK."

25  
26 e. All Photocopies, transcripts, or other reproduction of the documents, or of any of the  
27 contents of those documents, are also subject to this Protective Order.

28 4. That without written permission from Defendants or a Court order secured after  
appropriate notice to all interested persons, a party may not file in the public record in

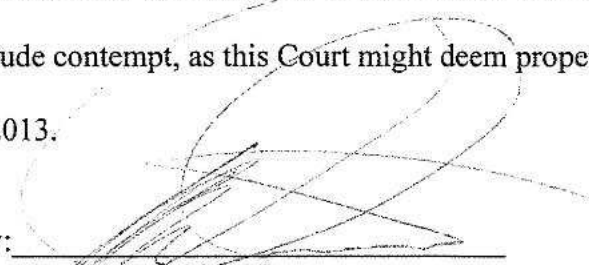
1 this action any protected material.

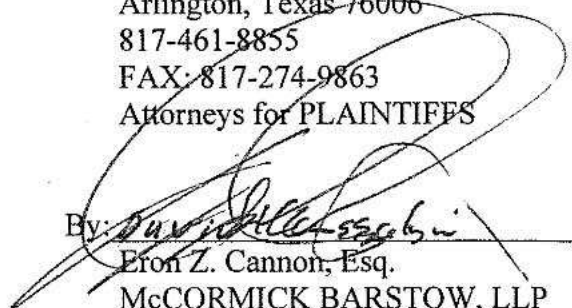
2 5. That the Parties further acknowledge that pursuant to Kamakana v. City and Chamber of  
3 Honolulu, 447 F.3d 1172, 1180 (9th Cir. 2006), any Party seeking to seal attachments to a  
4 motion for summary judgment or other dispositive motion shall be required to seek  
5 further leave of Court.

6 6. That when seeking leave to file documents under seal seeking protective status of the  
7 document(s), the Parties must establish "compelling reasons" to rebut the presumption of  
8 the public access and submit a separate memorandum of points and authorities which  
9 presents articulable facts identifying the interest favoring continuing the secrecy of the  
10 attachments, and show that these specific interests outweigh the public's interests in  
11 disclosure.

12 A disclosure by a party, or by that party's agent, of any document that is subject to this  
13 Protective Order in a matter that is inconsistent with the provisions of this Protective Order will  
14 subject that party to sanctions, which may include contempt, as this Court might deem proper.

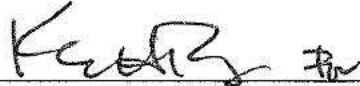
15 DATED this day 11<sup>th</sup> of September, 2013.

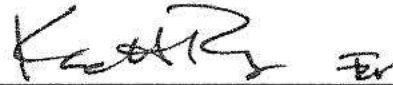
16 By:   
17 David Kassabian, Esq.  
18 Brett Weatherford, Esq.  
19 KASSABIAN, DOYLE & WEATHER  
20 2261 Brookhollow Plaza Drive, Suite 300, LB1  
21 Arlington, Texas 76006  
22 817-461-8855  
23 FAX: 817-274-9863  
24 Attorneys for PLAINTIFFS


25 By:   
26 Eron Z. Cannon, Esq.  
27 McCORMICK BARSTOW, LLP  
28 8337 West Sunset Road, #350  
Las Vegas, NV 89113  
702-949-1100  
FAX: 702-949-1101

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Attorney for PLAINTIFFS

By:   
E. Breen Arntz, Esq.  
E. BREEN ARNTZ, CHTD.  
1060 Wigwam Parkway  
Henderson, NV 89074  
702-309-3333  
FAX: 702-446-8164  
Attorney for DEFENDANT  
Peter Mario Balle, D.C.

By:   
J. Mitchell Cobeaga, Esq.  
THE COBEAGA LAW FIRM  
550 East Charleston Boulevard, #D  
Las Vegas, NV 89104  
702-240-2499  
Attorney for DEFENDANT  
Arthur Rossi, D.C.

By:   
Karen H. Ross, Esq.  
THE LAW OFFICE OF KAREN H. ROSS  
2275 Corporate Circle, Suite 160  
Henderson, NV 89074  
702-485-4152  
Attorney for DEFENDANTS  
Sebastian P. Balle, M.D. and  
Accident Injury Medical Center

Dated: September 12, 2013

**IT IS SO ORDERED**

  
\_\_\_\_\_  
U.S. Magistrate Judge