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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

GRAND CANYON SKYWALK DEVELOPMENT, LLC, a Nevada limited liability company; DY TRUST DATED JUNE 3, 2013, a Nevada Trust; THEODORE (TED) R. QUASULA, an individual;

Plaintiffs,

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DAVID JOHN CIESLAK, an individual; NICHOLAS PETER "CHIP" SCUTARI, an individual; SCUTARI & CIESLAK PUBLIC RELATIONS, INC., an Arizona corporation.

Defendants.

No. 2:13-cv-00596-RCJ-GWF

PLAINTIFFS' MOTION TO FILE UNDER SEAL ITS REPLY IN SUPPORT OF PLAINTIFFS' MOTION FOR LEAVE TO FILE SUPPLEMENTAL COMPLAINT

Comes now Plaintiffs Grand Canyon Skywalk Development, LLC, DY Trust dated June 3, 2013 and Theodore (Ted) R. Quasula (collectively "Plaintiffs"), by and through their attorneys, Greenberg Traurig, LLP, and hereby file this motion to file under seal Reply in Support of Plaintiffs' Motion for Leave to File Supplemental Complaint and supporting exhibits.

A stipulated protective order has been entered in this matter [doc. no. 74]. Pursuant to the terms of the protective order, information disclosed in documents produced by a party deemed

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confidential shall be governed by the protective order and marked with an appropriate legend of "Confidential" or "Confidential-Attorneys' Eyes Only."

Plaintiffs are filing a reply in support of its motion for leave to file supplemental complaint, under seal, which memorandum of points and authorities contains information designated as Confidential-Attorneys' Eyes Only within documents produced by Defendants. Additionally, Exhibits B, C and E to the Reply contains confidential information, the entirety of which has been deemed confidential under the proposed protective order. Public disclosure of information contained in the Reply along with the documents attached as exhibits to the Reply would waive the confidential nature of the information.

WHEREFORE, Plaintiffs respectfully request that the Court grant them leave to file their Reply, including exhibits, to Plaintiffs' motion for leave to file supplemental complaint under seal.

Respectfully submitted this 16th day of March, 2015.

GREENBERG TRAURIG, LLP

/s/ Mark G. Tratos Mark G. Tratos Donald L. Prunty 3773 Howard Hughes Parkway, Suite 400 North Las Vegas, NV 89169 Attorneys for Plaintiffs

ORDER

Having read and considered Plaintiffs' Motion to File Under Seal Reply in Support of Plaintiffs' Motion for Leave to File Supplemental Complaint and supporting exhibits and for good cause shown,

It is so ORDERED this 17th day of March , 2015 that Plaintiffs' Motion to File Under Seal Reply in Support of Plaintiffs' Motion for Leave to File Supplemental Complaint and supporting exhibits, be filed under seal.

UNITED STATES MACISTRATE JUDGE DATED: March 17, 2015