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7 *Counsel for Plaintiff*

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

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

13  
14 Plaintiff,

15 v.

16 DAVID JOHN CIESLAK, an  
 individual; NICHOLAS PETER  
 17 “CHIP” SCUTARI, an individual;  
 SCUTARI & CIESLAK PUBLIC  
 18 RELATIONS, INC., an Arizona  
 corporation.

19  
20 Defendant.

21 and related Third-Party Complaint

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

**PLAINTIFF’S MOTION TO FILE UNDER  
 SEAL EXHIBIT 1 TO PLAINTIFF’S  
 REPLY IN SUPPORT OF MOTION FOR  
 LEAVE TO FILE FIRST AMENDED  
 COMPLAINT**

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 23 Plaintiffs, Grand Canyon Skywalk Development, LLC (“GCSD”), DY TRUST DATED  
 24 JUNE 3, 2013, (“Jin”), and Ted Quasula (“Quasula”) (collectively “Plaintiffs”) by and through its  
 25 undersigned counsel, the law firm of Greenberg Traurig, LLP, hereby files their Motion to File under  
 26 Seal Exhibit 1 to Plaintiffs’ Reply in Support of their Motion for Leave to File First Amended  
 27 Complaint (“Reply”).  
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1 A stipulated protective order has been entered in this case [Doc. No.74]. Pursuant to the  
2 terms of the protective order, information disclosed in documents produced by a party deemed  
3 confidential shall be governed by the protective order and marked with an appropriate legend of  
4 “Confidential” or “Confidential-Attorneys’ Eyes Only”.

5 Exhibit 1 to Plaintiffs’ Reply, being filed concurrently herewith, contains quoted statements  
6 derived from documents which have been produced and designated by Defendants as Confidential or  
7 Confidential-Attorneys’ Eyes Only. Public disclosure of the information contained in Exhibit 1 to  
8 the Reply would waive the confidential nature of the information.

9 WHEREFORE, Plaintiffs respectfully requests that the Court grant them leave to file Exhibit  
10 1 to their Reply in support of their Motion for Leave to File First Amended Complaint under seal.

11 DATED: February 19, 2016.

12 GREENBERG TRAUERIG, LLP

13 */s/ Mark G. Tratos*

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Mark G. Tratos (Nev. Bar No. 1086)  
15 Donald L. Prunty (Nev. Bar No. 8230)  
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16 3773 Howard Hughes Parkway, Suite 400N  
Las Vegas, Nevada 89169  
17 *Counsel for Plaintiffs*

18 **ORDER**

19 Having read and considered Plaintiffs’ Motion to File Under Seal Exhibit 1 to Plaintiffs’  
20 Reply in Support of their Motion for Leave to File First Amended Complaint, and for good cause  
21 shown,  
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23 It is so ORDERED this 22nd day of February, 2016 that to Plaintiffs’ Reply in  
24 Support of their Motion for Leave to File First Amended Complaint, be filed under seal.

25 *George Foley Jr.*  
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UNITED STATES MAGISTRATE JUDGE

27 DATED: February 22, 2016

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 19, 2016, I served **PLAINTIFF’S MOTION TO FILE UNDER SEAL EXHIBIT 1 TO PLAINTIFF’S REPLY IN SUPPORT OF MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT** via the court’s CM/ECF electronic service to all registered parties:

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*Attorneys for Defendants David John Cieslak,  
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/s/ Cynthia Ney  
An Employee of Greenberg Traurig, LLP

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