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10 *Attorneys for Plaintiff*
 11 *Beazley Insurance Company, Inc.*

12
 13 UNITED STATES DISTRICT COURT
 14 DISTRICT OF NEVADA

15
 16 BEAZLEY INSURANCE COMPANY,
 INC., a Connecticut Corporation,

17
 18 Plaintiff,

19 v.

20 EAGLE GROUP HOLDINGS, LLC, a
 Nevada Limited Liability Company,
 and JAY BLOOM, an individual,

21 Defendants.
 22

Case No. 2:13-cv-00963 JCM-NJK

**NOTICE OF SETTLEMENT
 AND STIPULATION AND
 REQUEST FOR ORDER
 STAYING ACTION AND
 APPLICABLE DEADLINES;
 [PROPOSED] ORDER
 THEREON**

(FIRST REQUEST)

AMENDED PAGE 2

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1 WHEREAS, on May 31, 2013, Plaintiff Beazley Insurance Company, Inc.
2 (“Beazley”) filed the above-captioned action for declaratory and other relief against
3 Defendant Eagle Group Holdings, LLC (“Eagle Group”) and Defendant Jay Bloom
4 (“Bloom”). This action concerns a dispute over insurance coverage under a
5 professional liability insurance policy issued by Beazley to the Defendants (the
6 “Policy”) for the underlying lawsuit captioned *Braxton v. Eagle Group Holdings,*
7 *LLC*, Case No. A-12-672783-C (Clark County, Nevada) (the “*Braxton* action”).

8 WHEREAS, the *Braxton* action is a putative class action filed by Plaintiff
9 Harold Braxton and others similarly situated (collectively the “Class”) against
10 Eagle Group.

11 WHEREAS, on August 6, 2013, the Class, Eagle Group, Bloom, and Beazley
12 participated in a mediation of this matter with Hon. Edward A. Panelli (Ret.).

13 WHEREAS, the parties reached a global settlement of this action and the
14 *Braxton* action at the August 6, 2013 mediation (the “Global Settlement”).

15 WHEREAS, the Global Settlement is contingent upon, among other things,
16 the *Braxton* court approving the Global Settlement and certifying the Class for
17 settlement purposes.

18 WHEREAS, the parties anticipate filing a motion for preliminary approval of
19 the Global Settlement in the *Braxton* action shortly. Subsequently, once notice,
20 allowance for opt outs, and other required class administration matters have been
21 performed, the parties will seek final approval of the Global Settlement.

22 WHEREAS, for these reasons, good cause exists to stay this action and
23 continue all applicable deadlines until the later of (i) the final approval of the
24 Global Settlement by the *Braxton* court, (ii) a finding by the *Braxton* court that the
25 Global Settlement will not be approved, or (iii) upon motion of any party for good
26 cause.

27 NOW THEREFORE, BASED ON THE FOREGOING, Beazley, Eagle
28 Group and Bloom hereby STIPULATE AND REQUEST that the Court stay this

1 action and continue all applicable deadlines until the later of (i) the final approval
2 of the Global Settlement by the *Braxton* court, (ii) a finding by the *Braxton* court
3 that the Global Settlement will not be approved, or (iii) upon motion of any party
4 for good cause. The parties shall notify the Court as soon as practicable after one of
5 these events occurs.

6 Dated: August 21, 2013

Kevin J. Kieffer

TROUTMAN SANDERS LLP

Craig R. Delk
THORNDAL, ARMSTRONG, DELK
BALKENBUSH & EISNER

11 By: /s/ Kevin J. Kieffer
12 Kevin J. Kieffer

13 *Attorneys for Plaintiff*
14 *Beazley Insurance Company, Inc.*

15 Dated: August 21, 2013

Joseph A. Gutierrez

18 MAIER GUTIERREZ AYON

19 By: /s/ Joseph A. Gutierrez
20 Joseph A. Gutierrez

21 *Attorneys for Defendants*
22 *Eagle Group Holdings, LLC and Jay Bloom*

23 **The parties must submit a joint status report to the Court no later than**
24 **November 20, 2013.**

25 **IT IS SO ORDERED**

26 Dated this 22nd day of August 2013

27 
28 U.S. Magistrate Judge