1	EDWARD W. SUH (Admitted pro hac vic	
2	LAW OFFICES OF MICHAEL K. SUH & 3810 WILSHIRE BOULEVARD, SUITE	
-3	LOS ANGELES, CA 90010 Telephone: (213) 385-7347 Facsimile: (213) 383-3323	
4	Facsimile: (213) 383-3323 Edward@suhnassoclaw.com	
5	Matthew I. Knepper, Esq.	
6	Nevada Bar No. 12796	
7	Miles N. Clark, Esq. Nevada Bar No. 13848	
	KNEPPER & CLARK LLC	
8	10040 W. Cheyenne Ave., Suite 170-109 Las Vegas, NV 89129	
9	Phone: (702) 825-6060	
10	FAX: (702) 447-8048 Email: matthew.knepper@knepperclark.co	m
11	Email: miles.clark@knepperclark.com	
12	Attorneys for Plaintiffs	
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14		
15		DISTRICT COURT OF NEVADA
16		
17	RAMA SOU; TAI BUI; and SCOTT ZIMMERMAN,	Case No. 2:15-cv-00698-APG-VCF
18	Plaintiffs,	STIPULATION AND [PROPOSED] ORDER TO STRIKE AND
19		REPLACE EXHIBITS
20		[LR IC 6-1]
21	MICHAEL BASH; JEREMY BASH; BERKLEY	
22	ENTERPRISES, INC.; PEPPERDINE ENTERPRISES,	
23	INC.; NINETY-FIVE FORT APACHE COMPLEX, LLC;	
24	ROYAL VIEW, LLC; and DOES 1 through 20, inclusive,	
25	Defendants	
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		2:15 av 00600 AD

1	TO THE HONORABLE COURT, ALL PARTIES, AND THEIR	
2	COUNSEL OF RECORD:	
3	Plaintiffs Rama Sou, Tai Bui, and Scott Zimmerman (collectively,	
4	"Plaintiffs"), on the one hand, and defendants Michael Bash, Jeremy Bash,	
5	Berkley Enterprises, Inc., Pepperdine Enterprises, Inc., Ninety-Five Fort Apache	
6	Complex, LLC, and Royal View, LLC (collectively, "Defendants"), on the other	
7	hand, by and through their respective counsel, hereby stipulate as follows:	
8	WHEREAS, on March 20, 2017, Plaintiffs filed a Motion for Summary	
9	Judgment against Jeremy Bash, and included certain exhibits with the Motion;	
10	WHEREAS, on April 7, 2017, Defendants' counsel brought to Plaintiffs'	
11	counsel's attention that certain exhibits contained information that should have	
12	been redacted;	
13	WHEREAS, in light of the aforesaid, and in the interests of equity and	
14	judicial economy, the parties agree to allow Plaintiffs to strike the non-compliant	
15	exhibits and to replace the exhibits with those that have been properly redacted;	
16	NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the	
17	parties, through their respective counsel of record, that good cause exists and it is	
18	in the best interests of all parties that: sealed	
19	(1) ECF Docket $\frac{103.18}{103.18}$ and $\frac{103.26}{103.28}$ shall be struck, and replaced by the	
20	redacted exhibits attached hereto.	
21		
22	IT IS SO STIPULATED.	
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24		
25	Dated:April 17, 2017LAW OFFICES OF MICHAEL K. SUH &ASSOCIATES	
26	ASSOCIATES	
27		
28	By: <u>/s/ Edward W. Suh</u> Edward W. Suh	
	-	
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1	CA Bar No. 265356 Admitted Pro Hac Vice	
2	Miles N. Clark	
3	NV Bar No. 13848 KNEPPER & CLARK LLC	
4	Attorneys for Plaintiffs	
5	Rama Sou, Tai Bui, and Scott Zimmerman	
6		
7 8	Dated: April 17, 2017 LAW OFFICE OF ANDREW H. PASTWICK L.L.C.	
9		
10	By: <u>/s/ Andrew H. Pastwick</u>	
11 12	Andrew H. Pastwick NV Bar No. 009146 LAW OFFICE OF ANDREW H.	
13	PASTWICK L.L.C.	
14	Attorneys for Defendants	
15	Michael Bash, Jeremy Bash, Berkley Enterprises, Inc., Pepperdine Enterprises, Inc., Ninety-Five Fort Apache Complex,	
16	LLC, and Royal View, LLC	
17	The Clerk of Court is directed to seal ECF Nos. 103-18 and 103-26 and replace them with th redacted exhibits attached in ECF No. 107.	
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19	IT IS SO ORDERED:	
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21 22	Contractor	
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23 24	UNITED STATES MAGISTRATE JUDGE	
25		
26	4-10-2017 DATED:	
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