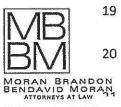
1 LEW BRANDON, JR., ESQ. Nevada Bar No. 5880 JUSTIN W. SMERBER, ESQ. 2 Nevada Bar No. 10761 MORAN BRANDON BENDAVID MORAN 3 630 S. Fourth Street Las Vegas, Nevada 89101 (702) 384-8424 4 (702) 384-6568 - facsimile l.brandon@moranlawfirm.com 5 Attorneys for Defendant, THE VONS COMPANIES, INC. 6 UNITED STATES DISTRICT COURT DISTRICT OF NEVADA 7 RENISHA NIEVES, an individual. 8 CASE NO.: 2:15-cv-00864-JCM-VCF Plaintiff, 9 VS. 10 THE VONS COMPANIES, INC., a Michigan Corporation, d/b/a VON'S STORE (#2615); DOE Individuals 1-10; 11 DOE EMPLOYEE and ROE Corporations 11-20, 12 Defendants. 13 LIMITED STIPULATION AND ORDER REGARDING AGREED PROTECTIVE ORDER 14 COMES NOW, Defendant, THE VONS COMPANIES, INC., by and through its 15 undersigned attorneys, LEW BRANDON, JR., ESQ., JUSTIN W. SMERBER, ESQ. of 16 MORAN BRANDON BENDAVID MORAN, Plaintiff, RENISHA NIEVES, by and through 17 her attorney, JOSHUA DOWLING, ESQ. of COGBURN LAW OFFICES and request an Order 18 as follows: 19 20 RAN BRANDON DAVID MORAN TTORNEYS AT LAW 630 SOUTH 4TH STREET

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LAS VEGAS, NEVADA 89101

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Defendant has produced the following items, which the parties agree shall be 1 designated as confidential, proprietary and subject to protection in this action until the Court has 2 ruled on a Motion for Protective Order regarding such items. Accordingly, it is agreed 3 Defendant will file a Motion for Protective Order regarding the above-mentioned items by no 4 later than March 28, 2016. In the event Defendant fails to do so, the following items will not be 5 deemed to be confidential, proprietary or subject to the protection in this action. 1. Employee file of Adam Garbar; 6 2. Employee file of Angela Baca; 7 3. Employee file of Larry Garbar; 8 Master Agreement for Floor Care – Janitorial Services between Safeway, Inc./The Vons Company, Inc. and Come Land Maintenance Service Company 9 dated April 20, 2014; 10 5. Termination of Services Letter from The Vons Company, Inc. to Come Land Maintenance Co, Inc. dated March 23, 2015; 11 6. Courtesy Clerk Bottom of Basket Policy and Guidelines; 12 7. Annual Sweep Program Policy and Guidelines; 13 8. Safeway/Vons Companies Courtesy Clerk Cleaning Training Materials; 9. Safeway/Vons Companies Culture of Safety Training Materials Presentation; 14 10. Meat/Seafood Departments Sanitation Reference Guide; 15 11. Welcome to Safeway/Vons Companies Training Guide Presentation; 16 12. Floor Care Trainer's Guide; 17 13. Floor Care Training Evaluation Guide; and 18 14. Vons Loss Report for falls 2009-2016.



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Pending the Court's ruling on Defendant's Motion for Protective Order to be filed by 1 no later than March 28, 2016, the foregoing confidential documents and information contained 2 therein shall be used solely for the prosecution or defense of this litigation. Such confidential 3 documents and information may be disclosed only to the following persons: (a) parties to this 4 litigation; (b) counsel for the parties and persons regularly employed in the offices of counsel 5 for the parties; (c) outside experts or professional advisors retained by a party to assist in the prosecution or defense in the case and persons regularly employed in the offices of such outside 6 professional advisors; (d) court personnel, deponents experts and 7 reporters/videographers; provided, however, that prior to such disclosure to the persons 8 describing clause (a) and (c) above, counsel shall furnish a copy of this Protective Order to such 9 person and obtain the written agreement of such person to be bound by the terms of this 10 Protective Order. The requirement of obtaining such a written agreement may be satisfied by obtaining the signature of any such person at the foot of a copy of this Order. 11 12 13 14 15 16 17 18 19 20

and

court



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1	Nothing contained in this Protective Order shall preclude Defendant from using its own	
2	confidential documents or information in any manner they see fit, or from reviewing such	
3	confidential documents or information to whomever they choose, without the prior consent of	
	any other party or of this Court.	
4	DATED this 1 day of March, 20	16.
5	MORAN BRANDON BENDAVID MOR	AN COGBURN LAW OFFICES
6		4
7	LEW BRANDON, JR., ESQ. Nevada Bar No. 5880	JAMIE S. COGBURN, ESQ. Nevada Bar No. 8409
8	JUSTIN W. SMERBER, ESQ. Nevada Bar No. 10761	JOSHUA DOWLING, ESQ. Nevada Bar No. 12956
9	KRIS D. KLINGENSMITH, ESQ. Nevada Bar No. 13904 630 S. Fourth Street	2879 St. Rose Parkway, Suite 200 Henderson, Nevada 89052 Attorneys for Plaintiff,
10	Las Vegas, Nevada 89101	RENISHA NIEVES
10	Attorneys for Defendant, THE VONS COMPANIES, INC.	
11	-,	
12	IT IS SO ORDERED this	_day of, 2016.
13	Contractor	
		UNITED STATES MAGISTRATE JUDGE
14	Respectfully Submitted by:	
15	MORAN BRANDON BENDAVID MORAN	
16		
17	LEW BRANDON, JR., ESQ.	
17	Nevada Bar No. 5880	
18	JUSTIN W. SMERBER, ESQ. Nevada Bar No.: 10761	
	KRIS D. KLINGENSMITH, ESQ. Nevada Bar No.: 13904	
MR 19	Attorneys for Defendant,	
20	THE VONS COMPANIES, INC.	
MORAN PRANSON	Process of the state of the sta	
BENDAVID MORAN ATTORNEYS AT LAW 21	2	
LAS VEGAS, NEVADA 89101 PHONE: (702) 384-8424 FAX: (702) 384-6568	Pa	ge 4 of 4