

1 DYLAN P. TODD  
 Nevada Bar No. 10456  
 2 TODD W. BAXTER  
 Admitted Pro Hac Vice  
 3 McCORMICK, BARSTOW, SHEPPARD,  
 WAYTE & CARRUTH LLP  
 4 8337 West Sunset Road, Suite 350  
 Las Vegas, Nevada 89113  
 5 Telephone: (702) 949-1100  
 Facsimile: (702) 949-1101  
 6 *dylan.todd@mccormickbarstow.com*  
*todd.baxter@mccormickbarstow.com*

7  
 8 ERON Z. CANNON  
 Nevada Bar No. 8013  
 FAIN ANDERSON VANDERHOEF  
 9 ROSENDAHL O'HALLORAN SPILLANE PLLC  
 701 5<sup>th</sup> Avenue #4750  
 10 Seattle, Washington 98104  
 Telephone: (206) 749-0094  
 11 Facsimile: (206) 749-0194  
*eron@favros.com*

12 Attorneys for Plaintiffs/Counterdefendants

13  
 14 **UNITED STATES DISTRICT COURT**  
 15 **DISTRICT OF NEVADA**

16 ALLSTATE INSURANCE COMPANY,  
 17 ALLSTATE PROPERTY & CASUALTY  
 INSURANCE COMPANY, ALLSTATE  
 18 INDEMNITY COMPANY, and ALLSTATE  
 FIRE & CASUALTY INSURANCE  
 19 COMPANY,

20 Plaintiffs,

21 v.

22 RUSSELL J. SHAH, MD, DIPTI R. SHAH,  
 MD, RUSSELL J. SHAH, MD, LTD., DIPTI  
 23 R. SHAH, MD, LTD., and RADAR  
 MEDICAL GROUP, LLP dba UNIVERSITY  
 24 URGENT CARE, DOES 1-100, and ROES  
 101-200,

25 Defendants.

CASE NO. 2:15-cv-01786-APG-CWH

**STIPULATION TO INCLUDE NAQVI  
 INJURY LAW INTO THE STIPULATED  
 CONFIDENTIALITY AND PROTECTIVE  
 ORDER (ECF NO. 39) FOR THE  
 DISCLOSURE OF DOCUMENTS  
 PURSUANT TO F.R.C.P. 45 SUBPOENA**

26  
 27 AND RELATED CLAIMS

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE  
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,  
3 and ALLSTATE FIRE & CASUALTY COMPANY (collectively referred to as the "Plaintiffs"), and  
4 NAQVI INJURY LAW (non-party herein after referred to as "NIL") hereby stipulate and agree as  
5 follows:

6 1. Plaintiffs served NIL with a subpoena pursuant to F.R.C.P. 45 for the production of  
7 documents regarding communications and payments made by and between Law Firm and the  
8 Defendants during NIL's representation of certain clients in personal injury claims for which Plaintiffs  
9 paid on settlement on behalf of Plaintiffs' insureds.

10 2. NIL provided a written objection to the Rule 45 subpoena.

11 3. NIL is aware that Plaintiffs have subpoenaed several law firms seeking the same type  
12 of information pursuant to Rule 45 in this case, as well as a companion sister-lawsuit *Allstate v.*  
13 *Belsky, et. al. Case No. 2:15-cv-00065-MMD-CWH* ("*Belsky*").

14 4. NIL understands that this Court presides over both the instant matter as well as the  
15 *Belsky* matter, and that this Court has ruled consistently in both these cases and ordered other law  
16 firms to produce the same type of documents request of NIL.

17 5. A stipulated confidentiality and protective order in this case entered between Plaintiffs  
18 and Defendants for the disclosure of confidential, sensitive or other protected information was  
19 approved by this Court on May 20, 2016. (ECF No. 39).

20 6. NIL was not a party to the stipulated confidentiality and protective order. (ECF No.  
21 39).

22 7. In ordering compliance with Plaintiffs' subpoenas to other law firms, this Court also  
23 ordered that the confidentiality and protective order (ECF No. 39) be applied to those law firms.

24 8. In accordance with this Court's prior rulings both in this action and in the *Belsky*  
25 matter, the parties hereby stipulate and agree that the protections and scope articulated in the  
26 Stipulated Confidentiality and Protective Order approved by this Court on May 20, 2016. (ECF No.  
27 39) be extended in their entirety to cover NIL in its compliance with Plaintiffs' subpoena.

28 ///

1 9. NIL will produce all documents responsive to the subpoena within ten (10) days of  
2 approval and entry of this Order by the Court.

3 IT IS SO STIPULATED.

4 Dated: 1/11/19

Dated: January 11, 2019

5 McCORMICK, BARSTOW, SHEPPARD,  
6 WAYTE & CARRUTH LLP

NAQVI INJURY LAW

7 By: 

By: /s/ Elizabeth E. Coleman

8 DYLAN P. TODD, ESQ.  
9 Nevada Bar No. 10456  
10 8337 West Sunset Road, Suite 350  
11 Las Vegas, NV 89113

*Attorneys for Plaintiffs/Counterdefendants*

Elizabeth E. Coleman, Esq.  
Nevada Bar No. 12350  
9500 W. Flamingo Rd., #104  
Las Vegas, NV 89147  
702-553-1000

12 **ORDER**

13 IT IS SO ORDERED.

14 DATED this 14 day of January, 2019.

15  
16  
17   
18 UNITED STATES MAGISTRATE JUDGE

19 003246-001559 5559591.1