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12 Attorneys for Plaintiffs/Counterdefendants

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

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

19 Plaintiffs,

20 v.

21
 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
 DECASTROVERDE LAW GROUP INTO
 THE STIPULATED CONFIDENTIALITY
 AND PROTECTIVE ORDER (ECF NO.
 39) FOR THE DISCLOSURE OF
 DOCUMENTS PURSUANT TO F.R.C.P.
 45 SUBPOENA**

26 AND RELATED CLAIMS

28

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 DECASTROVERDE LAW GROUP (non-party herein after referred to as "DLG") hereby stipulate
5 and agree as follows:

6 1. Plaintiffs served DLG 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 DLG's representation of certain clients in personal injury claims for which
9 Plaintiffs paid on settlement on behalf of Plaintiffs' insureds.

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

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

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

19 5. DLG was not a party to the stipulated confidentiality and protective order. (ECF No.
20 39).

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

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

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1 8. DLG 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.

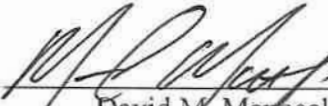
4 Dated:

Dated:

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

DECASTROVERDE LAW GROUP

7 By: 

8 By:  for 14583

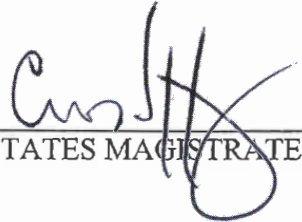
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14 **ORDER**

15 IT IS SO ORDERED.

16 DATED this 30 day of January, 2019.

17 
18 UNITED STATES MAGISTRATE JUDGE

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