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R. SHAH, MD, LTD.; and RADAR
12 MEDICAL GROUP, LLP dba UNIVERSITY
URGENT CARE

13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

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

18 Plaintiffs,

19 vs.

20 RUSSELL J. SHAH, M.D.; DIPTI R. SHAH,
M.D.; RUSSELL J. SHAH, MD, LTD.; DIPTI R.
21 SHAH, MD, LTD.; and RADAR MEDICAL
GROUP, LLP dba UNIVERSITY URGENT
22 CARE, Does 1-100, and ROES 101-200,

23 Defendants.

Case No. 2:15-cv-01786-APG- DJA

**STIPULATION AND ORDER TO
AMEND THE STIPULATED
CONFIDENTIALITY AGREEMENT
AND PROTECTIVE ORDER**

24
25 The parties, by and through their respective counsel of record, hereby stipulate and agree to
26 amend the Stipulated Confidentiality Agreement and Protective Order (“Stipulated Protective
27 Order”), previously entered by this Court on May 20, 2016 [ECF No. 39].

28 ///

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1 Specifically, the parties stipulate and agree to amend the definition of “Confidential
2 Information” in Section II of the Stipulated Protective Order to now read as follows:

3 “Confidential Information” shall mean and include information,
4 testimony, interrogatory responses, responses to requests for
5 admissions, documents, materials, items and tangible things produced,
6 disclosed or otherwise exchanged in discovery in this action, regardless
7 of the medium or manner generated, stored or maintained (collectively,
8 “Discovery Material”), (i) which has not been made public, and (ii)
9 which constitutes protected health information (as defined under
10 HIPAA) pertaining to those non-parties (a) who are identified (by
11 initials) in Exhibit “A” to the Amended Complaint for Damages and
12 Demand for Jury Trial [ECF No. 41] (the “Amended Complaint”) or (b)
13 who are identified (by initials) in Exhibit “C” to this protective order in
14 regards to Defendants’ Amended Counterclaims [ECF No. 145] (the
“Amended Counterclaims”), and/or (iii) which constitutes trade secrets,
confidential research and development information, know-how,
proprietary data, commercial information, company policies or
practices, financial information, accounting information, business
strategies, personnel files, and/or highly personal and sensitive
information, (iv) which the producing party maintains in confidence,
and; (iv) which the producing party in good faith believes that the
unprotected disclosure or production of which may result in economic
or competitive injury or harm to or invasion of its rights or the rights of
a non-party to this action.

15 The parties further stipulate and agree that Exhibit “C”, as referenced in the above amended
16 definition of “Confidential Information,” a copy of which is attached hereto, shall be deemed to be
17 affixed to and made a part of the Stipulated Protective Order.

18 The parties further stipulate and agree that compliance with Section 4.4 of the Stipulated
19 Protective Order is not required prior to any disclosure or use of protected health information for
20 those patients identified (by initials) in Exhibit “C.”

21 This Stipulation is brought in good faith and not for the purpose of delay.

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1 Based on the foregoing, the parties respectfully request that the Court approve this
2 Stipulation and hereby amend the Stipulated Protective Order as outlined above. Except as amended
3 by this Stipulation, all provisions of the Stipulated Protective Order shall remain unmodified and in
4 full force and effect.

5 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

6 DATED this 26th day of October, 2020.

DATED this 26th day of October, 2020.

7 McCORMICK, BARSTOW, SHEPPARD,
8 WAYTE & CARRUTH LLP

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25 **IT IS SO ORDERED.**

UNITED STATES MAGISTRATE JUDGE

26 DATED: October 27, 2020

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EXHIBIT C

EXHIBIT C

*Allstate v. Shah***EXHIBIT C****ADDITIONAL CLAIMANT DOCUMENTS PRODUCED BY ALLSTATE**

Allstate Claim No.	Date of Loss	Claimant Initials
0315614024	02/05/14	JB
0356078303	01/27/15	RC
0383311677	09/06/15	JC
0383779352	09/11/15	IB
0387327414	09/22/15	TR
0385214291	09/23/15	WT
0385498983	09/25/15	JGC
0386140461	09/29/15	DL
0386251003	10/02/15	AJ
0386585772	10/05/15	EG
0388040123	10/16/15	JF
0404642613	10/21/15	MB
0388951451	10/24/15	AS
0389086983	10/26/15	IA
0389147224	10/26/15	AS, AS
0390429355	10/27/15	DH, FG
0389615708	10/28/15	BN, AS
0389732289	10/29/15	WC
0390823169	11/06/15	WC
0391134467	11/10/15	NG
0410228019	11/13/15	WG
0392849931	11/23/15	EM
0392735956	11/24/15	JGV
0393731724	11/27/15	MS
0393449525	12/01/15	SH
0393703087	12/03/15	MS
0395053515	12/04/15	JD
0393988118	12/06/15	MV
0394384564	12/09/15	KMB
0394650535	12/09/15	SC
0394626097	12/11/15	LS
0395363625	12/17/15	PA, IA
0395876055	12/18/15	ACR
0395822935	12/22/15	VC
0395583925	12/19/15	CV
0395859499	12/22/15	JL
0396601403	12/26/15	JG
0396601593	12/27/15	AF

Allstate Claim No.	Date of Loss	Claimant Initials
0315614024	02/05/14	JB
0356078303	01/27/15	RC
0397082900	01/04/16	AK
0398036194	01/12/16	PB
0398542613	01/14/16	DR
0399222751	01/15/16	SB, RH
0398761213	01/17/16	SB
0398771782	01/18/16	SR
0399184381	01/19/16	DA
0399213008	01/21/16	RA
0400261665	01/30/16	JG
0401704416	02/11/16	KVR
0401755616	02/12/16	KF
0401888722	02/14/16	JR, CB
0401981824	02/14/16	PA
0402723621	02/21/16	RLL
0403129141	02/13/16	BW
0404498601	03/04/16	FP
0404900656	03/09/16	DCA
0405984097	03/18/16	AT
0406798610	03/23/16	MD, MG
0409429479	04/06/16	TN
0408720779	04/08/16	BA
0408088367	04/14/16	RR
0410220305	04/19/16	SS
0410660534	04/21/16	LM
0411738305	04/30/16	CF
0412369027	05/05/16	JVE
0413391467	05/12/16	MA
0417076056	06/13/16	KS
0417254612	06/07/16	RJ
0417717246	06/17/16	FV
0417945771	06/18/16	ESL
0419314810	06/30/16	OAC
0419586325	07/01/16	JD
0420087165	07/06/16	OL
0421736299	07/18/16	LM, LD
0423367358	07/26/16	WB
0422660613	07/27/16	JN, PN
0424254126	08/08/16	WC
0424434520	08/09/16	AM, AM
0427424411	09/02/16	BE
0435068879	11/06/16	CM
0435845862	11/13/16	TT

Allstate Claim No.	Date of Loss	Claimant Initials
0315614024	02/05/14	JB
0356078303	01/27/15	RC
0437723083	11/30/16	AL, GP
0439746669	12/18/16	SG
0442712303	01/15/17	JJ
0443978895	01/25/17	MF
0488060559	01/08/18	JA
0493472096	02/26/18	DB, TB, CB, AB
0494794126	03/10/18	TG, KG
0495002909	03/12/18	SBC
0504355793	06/02/18	JH
0505852442	06/08/18	FH
0505373274	06/11/18	AQ
0509287140	06/13/18	DL
0506337492	06/18/18	FS
0558905642	07/18/18	LH
0510155518	07/19/18	RP
0515746071	08/31/18	FM
0515530103	09/01/18	EC, BC, JE, LSC, RA
0563204817	09/21/18	RC
0519488225	10/04/18	JB
0522796241	10/30/18	SC
0525025409	11/18/18	LF
0526213913	11/28/18	DS
0528017486	12/14/18	AR
0529877788	12/21/18	SMP
0553340571	03/16/19	MT
0540985801	04/07/19	KK
0543014807	04/23/19	AS
0543472260	04/26/19	MM
0545432866	05/12/19	ICH
0547141879	05/27/19	FM
0548496602	05/27/19	FM
0551461593	06/29/19	JMS
0552171381	07/03/19	HD
0558494159	08/25/19	ACM