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14 UNITED STATES DISTRICT COURT

15 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 MARJORIE BELSKY, MD; MARIO  
22 TARQUINO, MD; MARJORIE BELSKY,  
MD, INC., doing business as INTEGRATED  
23 PAIN SPECIALISTS; and MARIO  
TARQUINO, MD, INC., DOES 1-100, and  
24 ROES 101-200,

25 Defendants.

26 AND RELATED CLAIMS

CASE NO. 2:15-cv-2265-MMD-CWH

STIPULATION TO INCLUDE PALACIOS  
& ASSOCIATES INTO THE  
STIPULATED CONFIDENTIALITY AND  
PROTECTIVE ORDER (ECF NO. 49)  
FOR THE DISCLOSURE OF  
DOCUMENTS PURSUANT TO F.R.C.P.  
45 SUBPOENA

28 2:15-cv-2265-MMD-CWH

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 the law firm of PALACIOS & ASSOCIATES (non-party herein after referred to as "Palacios") hereby  
5 stipulate and agree as follows:

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

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

11 3. Palacios is aware that Plaintiffs have subpoenaed several law firms seeking the same  
12 type of information pursuant to Rule 45 in this case, as well as a companion sister-lawsuit *Allstate v.*  
13 *Shah, et. al. Case No. 2:15-cv-01786-APG-CWH* ("*Shah*").

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

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 June 3, 2016. (ECF No. 49).

20 6. Palacios was not a party to the stipulated confidentiality and protective order. (ECF No.  
21 49).

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. 49) be applied to those law firms.

24 8. In accordance with this Court's prior rulings both in this action and in the *Shah* matter,  
25 the parties hereby stipulate and agree that the protections and scope articulated in the Stipulated  
26 Confidentiality and Protective Order approved by this Court on June 3, 2016. (ECF No. 49) be  
27 extended in their entirety to cover Palacios in its compliance with Plaintiffs' subpoena.

1 9. Palacios 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.

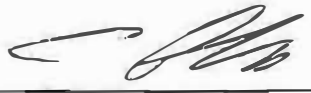
4 Dated: \_\_\_\_\_

Dated: *January 8, 2019*

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

PALACIOS & ASSOCIATES

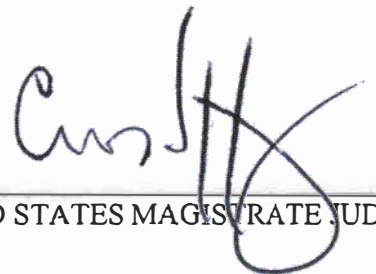
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11  
12  
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14  
15 ORDER

16 IT IS SO ORDERED.

17 DATED this 14 day of January 2019.

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19   
20 UNITED STATES MAGISTRATE JUDGE

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