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

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

22 Plaintiffs,

23 v.

24 MARJORIE BELSKY, MD; MARIO
25 TARQUINO, MD; MARJORIE BELSKY,
26 MD, INC., doing business as INTEGRATED
27 PAIN SPECIALISTS; and MARIO
28 TARQUINO, MD, INC., DOES 1-100, and
ROES 101-200,

Defendants.

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**

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.

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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

7 By: 

By: 

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ORDER

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IT IS SO ORDERED.

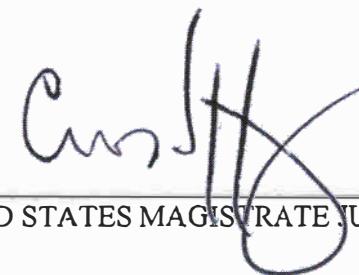
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DATED this 14 day of January 2019.

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UNITED STATES MAGISTRATE JUDGE

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003246-001560 5530963.1

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