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7 Attorneys for Defendant GEM SA

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 **BARTECH SYSTEMS INTERNATIONAL**
11 **INC.,**

12 **Plaintiff,**

13 **V**

14 **MOBILE SIMPLE SOLUTIONS, INC.,** a
 Delaware corporation, **MOBILE SIMPLE**
 15 **SOLUTIONS (IAS), INC.,** a Canadian
 corporation, **GEM SA,** a Belgian
 16 corporation, **VINCENT TESSIER,** an
 individual, **CHRISTELLE PIGEAT,** an
 17 individual,

18 **Defendants**

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 20 **MOBILE SIMPLE SOLUTIONS, INC.,** a
 Delaware corporation, **VINCENT TESSIER,**
 21 an individual, **CHRISTELLE PIGEAT,** an
 individual,

22 **Counterclaimants,**

23 **vs.**

24 **BARTECH SYSTEMS INTERNATIONAL**
 25 **INC.,** a Delaware corporation,

26 **Counter-defendant.**

Case No. 2:15-cv-02422-MMD-NJK

STIPULATION AND ORDER TO ADD
DEFENDANT/COUNTERCLAIMANT
GEM SA AS A PARTY TO THE
AMENDED STIPULATED
PROTECTIVE ORDER REGARDING
CONFIDENTIALITY AND NON-
WAIVER OF ATTORNEY-CLIENT
PRIVILEGE AND WORK PRODUCT
PROTECTION

1 Defendant/Counterclaimant GEM SA (“GEM”), by and through its counsel of record, the
2 firm of Greene Infuso, LLP, and Plaintiff/Counterdefendant Bartech Systems International, Inc.’s
3 (“Bartech”), by and through its counsel of record, the firm of Parsons Behle & Latimer and the
4 firm of Conti, Fenn & Lawrence, hereby stipulate and agree to the following:

5 WHEREAS, Bartech and Defendants Mobile Simple Solutions, Inc. (“Mobile”), Vincent
6 Tessier (“Tessier”), Christelle Pigeat (“Pigeat”), and their respective counsel of record entered the
7 Amended Stipulated Protective Order Regarding Confidentiality and Non-Waiver of Attorney-
8 Client Privilege and Work Product Protection (“Amended Protective Order”) in or around July,
9 2015;

10 WHEREAS, the Court signed the Amended Protective Order on or about August 19, 2015,
11 and the Amended Protective Order was subsequently filed with the Court on or about August 21,
12 2015;

13 WHEREAS, GEM, and Greene Infuso, LLP, as counsel for GEM, agree to be bound by
14 the protective provisions contained within the Amended Protective Order and become a signatory
15 thereto; and,

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1 WHEREAS, it is hereby stipulated and agreed by and between counsel of record for
2 Bartech and GEM to allow GEM to be added as a party to the Amended Protective Order;

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4 DATED this 28th day of July, 2017.

5 **GREENE INFUSO, LLP**

6
7 /s/ Keith W. Barlow
8 Michael V. Infuso, Esq.
9 Nevada Bar No. 7388
10 Keith W. Barlow, Esq.
11 Nevada Bar No. 12689
12 3030 South Jones Boulevard, Suite 101
13 Las Vegas, Nevada 89146
14 Attorneys for Defendant/Counterclaimant

DATED this 28th day of July, 2017.

PARSONS BEHLE & LATIMER

/s/ Michael R. Kealy
*(Signed by filing attorney with
permission of counsel)*
Michael R. Kealy, Esq.
Nevada Bar No. 971
Ashley C. Nikkel, Esq.
Nevada Bar No. 12838
50 W. Liberty Street, Suite 750
Las Vegas, Nevada 89501

– and –

CONTI FENN & LAWRENCE LLC

Gregory T. Lawrence, Esq.
(Admitted Pro Hac Vice)
Kyle S. Kushner, Esq.
(Admitted Pro Hac Vice)
36 S. Charles Street, Suite 2501
Baltimore, Maryland 21201
Attorneys for Plaintiff/Counterdefendant

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20 IT IS SO ORDERED:

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24 UNITED STATES MAGISTRATE JUDGE

25 DATED: July 31, 2017