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5 Attorney for Defendants Ethan Hoopes, Corporation
 6 of the President of The Church of Jesus
 7 Christ of Latter-day Saints, and
 Corporation of the Presiding Bishop of
 The Church of Jesus Christ
 of Latter-day Saints

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 NICOLAS SCOTT, an individual,) Case No. 2:16-cv-02646-APG-PAL

11 Plaintiff,)

12 vs.)

13 CORPORATION OF THE PRESIDING)
 14 BISHOP OF THE CHURCH OF JESUS)
 15 CHRIST OF LATTER-DAY SAINTS, a)
 foreign corporation; CORPORATION OF)
 16 THE PRESIDENT OF THE CHURCH OF)
 17 JESUS CHRIST OF LATTER-DAY)
 18 SAINTS, a foreign corporation; ETHAN)
 19 HOOPEES, an individual; DOES I through)
 20 XV; ROE CORPORATIONS I through X,)
 inclusive,)
 Defendants.)

**STIPULATION AND [PROPOSED]
 PROTECTIVE ORDER REGARDING
 PRODUCTION OF DEFENDANT ETHAN
 HOOPEES' EMAIL AND NON-WAIVER OF
 ATTORNEY CLIENT PRIVILEGE**

21 Defendants Corporation of the President of The Church of Jesus Christ of Latter-day Saints,
 22 Corporation of the Presiding Bishop of The Church of Jesus Christ of Latter-day Saints, and Ethan
 23 Hoopes (collectively "Defendants") and Plaintiff Nicolas Scott hereby stipulate and agree as follows:

- 24 1. Kendal Hoopes is the Father of Defendant Ethan Hoopes. Plaintiff alleges that Kendal
 25 Hoopes is also an attorney licensed to practice law in the State of Wyoming.
2. Following the accident that is the subject of this litigation, Defendant Ethan Hoopes sent
 an email to Kendal Hoopes on January 12, 2015. Defendant Hoopes alleges that he sent

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the email as both an update to his father and as a privileged communication to his attorney. Plaintiff Scott disputes the allegation of privilege.

3. Defendants have previously produced the Email in redacted form as Bates #CPB03931 – CPB03932.
4. The redactions were made on Defendant’s representation that the email contains privileged attorney-client communications. A privilege log was produced on June 15, 2017.
5. Defendant Ethan Hoopes agrees to produce the email in an unredacted form subject to the stipulations herein.
6. Plaintiff hereby stipulates that the production of the email in an unredacted form does not constitute a waiver of any actual attorney-client privilege between Defendant Ethan Hoopes and his counsel, including without limitation, Attorney Kendal Hoopes, to the extent such privilege otherwise exists.
7. Plaintiff further stipulates that all other disputes of privilege shall be determined on merits of the respective dispute without consideration of the disclosure of the January 12, 2015 email from Ethan Hoopes to Kendall Hoopes that is the subject of this stipulation.

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CLEAR COUNSEL LAW GROUP

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IT IS SO ORDERED:


 UNITED STATES MAGISTRATE JUDGE

DATED: June 29, 2017