

1 Amy M. Samberg (NV Bar No. 10212)  
[amy.samberg@clydeco.us](mailto:amy.samberg@clydeco.us)  
 2 Lee H. Gorlin (NV Bar No. 13879)  
[lee.gorlin@clydeco.us](mailto:lee.gorlin@clydeco.us)  
 3 CLYDE & CO US LLP  
 7251 West Lake Mead Boulevard, Suite 430  
 4 Las Vegas, NV 89128  
 Telephone: 725-248-2900  
 5 Facsimile: 725-248-2907

6 Gregory P. Varga (*Admitted Pro Hac Vice*)  
 J. Tyler Butts (*Admitted Pro Hac Vice*)  
 7 ROBINSON & COLE LLP  
 280 Trumbull Street  
 8 Hartford, CT 06103  
 Email: [gvarga@rc.com](mailto:gvarga@rc.com)  
 9 [jbutts@rc.com](mailto:jbutts@rc.com)

10 *Attorneys for The Travelers Indemnity*  
 11 *Company*

12 UNITED STATES DISTRICT COURT  
 13 DISTRICT OF NEVADA

14 TAMARES LAS VEGAS PROPERTIES,  
 15 LLC; PLAZA HOTEL & CASINO, LLC; and  
 T-UPR, LLC,

16 Plaintiffs,

17 vs.

18 THE TRAVELERS INDEMNITY  
 19 COMPANY,

20 Defendant.

Case No. 2:16-cv-02933-JAD-NJK

**STIPULATION AND ORDER RE: PAGE  
 LIMITS AND BRIEFING SCHEDULE  
 CONCERNING TRAVELERS' POST-  
 JUDGMENT MOTION FOR  
 ATTORNEYS' FEES AND COSTS**

ECF No. 263

21 **STIPULATION**

22 Plaintiffs Tamares Las Vegas Properties, LLC; Plaza Hotel & Casino, LLC; and T-UPR,  
 23 LLC (collectively "Plaintiffs"), through the law firm of Brownstein Hyatt Farber Schreck, LLP,  
 24 and The Travelers Indemnity Company ("Travelers"), through the law firms Clyde & Co LLP and  
 25 Robinson & Cole LLP (Plaintiffs together with Travelers, the "Parties") hereby agree and stipulate  
 26 as follows:

- 27 1. Travelers intends to file a Motion for Attorneys' Fees and Costs pursuant to Fed. R.  
 28 Civ. P. 54(d) ("Travelers' Motion") on November 30, 2022. *See* ECF No. 262.

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2. Travelers has indicated that its Motion will seek attorneys’ fees pursuant to two statutes (NRS 18.010 and 28 U.S.C. § 1927), the Federal Rules of Civil Procedure, as well as the Court’s inherent authority.
3. Each of these legal grounds presents differing standards for seeking an award of fees, and Travelers’ Motion and Plaintiffs’ Opposition will necessarily include a significant discussion of the underlying facts and procedural history of this matter, including certain pre-suit activity, pretrial discovery practice, motion practice, the trial, and information gathered during recent post-trial discovery.
4. Additionally, and pursuant to Local Rule 54-14, Travelers’ Motion and Plaintiffs’ Opposition will address Travelers’ request for attorneys’ fees with thirteen categories of information, which includes a discussion of the fees and costs that Travelers has incurred throughout the lifetime of this matter.
5. The Parties agree that there is good cause for increasing the page limits of their submissions in that the aforementioned subjects cannot be adequately addressed within the page limits prescribed by the Local Rules.
6. In light of the foregoing, the Parties agree and stipulate as follows:
  - a. The page limits of LR II 7-3 shall be waived for the purposes of briefing of Travelers’ Motion and Plaintiffs’ Opposition;
  - b. Travelers’ Motion shall be limited to 45 pages in length, excluding exhibits;
  - c. Plaintiffs’ Opposition to Travelers Motion shall be limited to 45 pages in length, excluding exhibits;
  - d. Plaintiffs shall file their Opposition to Travelers’ Motion on or before January 20, 2023;

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e. Travelers shall file its Reply to Plaintiffs' Opposition, and in support of Travelers' Motion, on or before February 10, 2023. Said Reply shall be limited to 15 pages in length, excluding exhibits.

Dated: November 22, 2022  
**BROWNSTEIN HYATT FARBER  
SCHRECK, LLP**

/s/ Patrick J. Reilly  
Frank M. Flansburg III  
Patrick J. Reilly  
100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106

*Attorneys for Plaintiffs*

Dated: November 22, 2022  
**CLYDE & CO US LLP**


/s/ Lee H. Gorlin  
Amy M. Samberg  
Lee H. Gorlin  
7251 West Lake Mead Boulevard, Suite 430  
Las Vegas, Nevada 89128

**ROBINSON COLE LLP**  
Gregory P. Varga  
J. Tyler Butts  
280 Trumbull Street  
Hartford, Connecticut 06103

*Attorneys for Defendant*

**ORDER**

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE  
DATED: 11-22-22