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11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

14 WILLIAM J. BERRY, JR.; CYNTHIA
 FALLS; SHANE KAUFMANN,

15 Plaintiffs,

16 vs.

17 DESERT PALACE, INC. d/b/a CAESARS
 18 PALACE; et al.,

19 Defendants.

Case No.: 2:17-cv-00019.-APG-BNW

**STIPULATION AND REQUEST
 FOR AN ORDER REGARDING
 PLAINTIFFS' SUBMISSION OF A
 REPLACEMENT BRIEF FOR
 THEIR SUPPLEMENTAL
 BRIEFING IN SUPPORT OF
 THEIR OPPOSITION TO
 DEFENDANT'S MOTION FOR
 SUMMARY JUDGMENT BASED
 ON NEWLY PRODUCED
 DOCUMENTS [ECF NO. 136]**

22 IT IS HEREBY STIPULATED AND AGREED among Plaintiffs WILLIAM J.
 23 BERRY, JR., CYNTHIA FALLS, AND SHANE KAUFMANN ("Plaintiffs") and
 24 Defendant DESERT PALACE, INC., d/b/a CAESARS PALACE ("Defendant"), that
 25 Plaintiffs be permitted to file a replacement to ECF No. 136, which is "Plaintiffs'
 26 Supplemental Briefing In Support of Their Opposition to Defendant's Motion for
 27 Summary Judgment Based on Newly Produced Documents." ECF No. 136. This
 28

1 replacement is requested because in filing their original supplemental brief on August 22,
2 2019, Plaintiffs incorrectly sought leave to file Exhibit 61 (Emails) and Exhibit 62
3 (Janiga's 2014 Tabulations) under seal. This new replacement supplemental briefing
4 includes all of the exhibits properly categorized and properly redacted pursuant to the
5 agreement between counsel with respect to sensitive and/or proprietary information.

6 The parties respectfully make this request pursuant to the Protective Order
7 Regarding Confidential Discovery Materials [ECF No. 43], and submit that good cause
8 exists for these minimal redactions in order to protect private, confidential, or proprietary
9 information about Caesars Palace employees. By agreement, the redactions found in the
10 replacement exhibits are limited to Caesars employees' personal phone numbers and the
11 previously redacted (by Caesars) customer information.

12 DATED this 1st day of October, 2019.

DATED this 1st day of October, 2019.

13 **MAIER GUTIERREZ & ASSOCIATES**

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14 /s/ Danielle J. Barraza

/s/ Esther G. Lander

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ORDER

IT IS SO ORDERED.

28 
UNITED STATES DISTRICT JUDGE
Dated: October 1, 2019.