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17			
18	UNITED STATES DISTRICT COURT		
19	DISTRICT OF NEVADA		
20			
21	WILLIAM J. BERRY, JR.; CYNTHIA FALLS; and SHANE		
22	CYNTHIA FALLS; and SHANE KAUFMAN,	Case No. 2:17-cv-00019-GMN-PAL	
23	Plaintiffs,		
24	V.	STIPULATION AND ORDER RE: FEDERAL RULE OF EVIDENCE	
25	DESERT PALACE, INC., d/b/a	502(d)	
	DESERT PALACE, INC., d/b/a CAESARS PALACE; DOES I through X, and ROE BUSINESS		
26	ENTITIES I through X, inclusive,		
27	Defendants.		
28			

1	IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs	
2	WILLIAM J. BERRY, JR., CYNTHIA FALLS, and SHANE KAUFMANN and	
3	Defendant DESERT PALACE, INC., d/b/a CAESARS PALACE, by and through	
4	their respective counsel of record, as follows:	
5	1. The production of privileged or work-product protected	
6	documents, ESI or information, whether inadvertent or otherwise, is not a waiver of	
7	the privilege or protection from discovery in this case or in any other federal or state	
8	proceeding. This Order shall be interpreted to provide the maximum protection	
9	allowed by Federal Rule of Evidence 502(d).	
10	2. Nothing contained herein is intended to or shall serve to limit a	
11	party's right to conduct a review of documents, ESI or information (including	
12	metadata) for relevance, responsiveness and/or segregation of privileged and/or	
13	protected information before production.	
14		
15	Dated: October 6, 2017 Dated: October 6, 2017	
16	By: By: By: _/s/ Kathleen J. England KATHLEEN J. ENGLAND	
17	SCOTT M. MAHONEY Fisher & Phillips LLP 300 S. Fourth Street, Suite 1500 Las Vegas, NV 89101 KATHLEEN J. ENGLAND Gilbert & England Law Firm 610 South Ninth Street Las Vegas, NV 89101	
18	Las Vegas, NV 89101 Las Vegas, NV 89101	
19	DONALD R. LIVINGSTON ESTHER G. LANDER Attorney for Plaintiffs, William J. Berry, Jr., Cynthia	
20	Akin Gump Strauss Hauer & Feld LLP 1333 New Hampshire Avenue, N.W. Wittiam J. Berry, Jr., Cylinta Falls, and Shane Kaufmann	
21	Washington, D.C. 20036	
22	Attorneys for Defendant, Desert Palace, Inc., d/b/a	
23	Caesars Palace	
24	IT IS SO ORDERED:	
25	United States Magistrate Judge	
26		
27	Dated: October 17, 2017	