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7 Attorneys for Plaintiff,
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 10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF NEVADA**

12 GEICO CASUALTY COMPANY, a
 Maryland company;
 13 Plaintiff,

CASE NO.: 2:17-cv-00961-APG-VCF

14 vs.

PLAINTIFF GEICO CASUALTY
 COMPANY'S PROPOSED
 CONFIDENTIALITY AGREEMENT AND
 PROTECTIVE ORDER

15 PAUL SCHNEIDER, individually;
 16 KIMBERLY SCHNEIDER, individually; and
 CASANDRA SCHNEIDER, individually,
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 18 Defendants.

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 20 **THIS MATTER**, having come before this Honorable Court on June 29, 2017 in
 21 PLAINTIFF'S MOTION FOR PROTECTIVE ORDER (ECF No. 21), and for good cause shown,
 22 having been granted on July 21, 2017 (ECF No. 22),

23 **IT IS HEREBY ORDERED THAT** the two affidavits of Karen Brinster be filed under
 24 seal.

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1 **IT IS FURTHER ORDERED THAT** the two affidavits of Karen Brinster, and the
2 information contained therein, only be disclosed to Defendants, Defendants' Counsel and staff,
3 any retained experts or consultants, and any authorized mediators, arbitrators, reinsurers, auditors
4 or regulators, or any other party as designated by this Honorable Court.

5 **IT IS FURTHER ORDERED THAT** Defendants, Defendants' Counsel and staff, any
6 retained experts or consultants, and any authorized mediators, arbitrators, reinsurers, auditors or
7 regulators, or any other party as designated by this Honorable Court, shall not disclose the two
8 affidavits, or the information contained therein, to any party not bound by this Order. To
9 "disclose" the affidavits, or any information contained therein, means to provide one or both
10 affidavits, to provide any documents which discuss either affidavit, or to discuss or refer to any of
11 the contents of either of the affidavits.

12 **IT IS FURTHER ORDERED THAT** the two affidavits of Karen Brinster, and the
13 information learned from them, are not to be used in any fashion other than for the purposes of
14 evaluating the Insureds' present claims in relation to the instant litigation. The affidavits and the
15 information learned from them are not to be used in the related state case in the Eighth Judicial
16 District Court, *Paul Schneider, et al. vs. Innette Lewis*, Case No. A-16-734700. If any other future
17 litigation would result, the confidential information from the two affidavits is to be kept
18 confidential to the greatest extent possible, even within the confines of any other potential
19 litigation.

20 **IT IS FURTHER ORDERED THAT** after final disposition of the instant matter, whether
21 through settlement or any other fashion, the obligations imposed by this Order shall remain in
22 effect. The Parties and Counsel for the Parties shall not discuss the two affidavits or information
23 gleaned from the two affidavits at all with any person or party at any time after conclusion of the
24 instant case. The Defendants agree to return the two affidavits, and any copies made of the two
25 affidavits or partial copies or reproductions, to Plaintiff and its counsel at the conclusion of the
26 instant case.

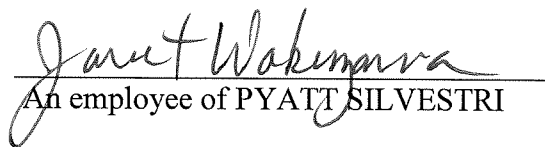
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1 **CERTIFICATE OF SERVICE**

2 Pursuant to FRCP 5(b), I hereby certify that I am an employee of PYATT SILVESTRI,
3 and that on the 28 day of July, 2017, I deposited in the United States Mail at Las Vegas,
4 Nevada, postage fully prepaid, a true and correct copy of the foregoing PLAINTIFF' GEICO
5 CASUALTY COMPANY'S PROPOSED CONFIDENTIALITY AGREEMENT AND
6 PROTECTIVE ORDER, and I also electronically filed the foregoing with the Clerk of the Court
7 using the CM/ECF system, which will send a notice of electronic filing to the following:

8 David F. Sampson, Esq.
9 200 E. Charleston Blvd.
10 Las Vegas, NV 89104
11 david@davidsampsonlaw.com
12 Attorney for Defendants,

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15 An employee of PYATT SILVESTRI
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