

1 Robert D. Mitchell (*admitted pro hac vice*)
William M. Fischbach III (*admitted pro hac vice*)
2 Fletcher R. Carpenter (*admitted pro hac vice*)
Jason C. Kolbe, Nevada Bar No. 11624
3 Kevin S. Soderstrom, Nevada Bar No. 10235



4
5 Camelback Esplanade II, Seventh Floor
6 2525 East Camelback Road
Phoenix, Arizona 85016-4229
7 Telephone: (602) 255-6000
8 Fax: (602) 255-0103
E-mails: rdm@tblaw.com; wmf@tblaw.com;
9 frc@tblaw.com; jck@tblaw.com; kss@tblaw.com

10 Counsel for Defendant/Counterclaimant Martin Tripp

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

14 TESLA, INC., a Delaware corporation,
15
16 Plaintiff,
17 vs.
18 MARTIN TRIPP, an individual,
19
20 Defendant.
21
22 MARTIN TRIPP, an individual,
23
24 Counterclaimant,
25
26 TESLA, INC., a Delaware corporation,
27
28 Counterdefendant

Case No. 3:18-cv-00296-LRH-CBC

**DEFENDANT/COUNTERCLAIMANT
MARTIN TRIPP'S MOTION TO SEAL
NOTICE OF THIRD-PARTY
DEPOSITION OF ELON MUSK**

1 Defendant/Counterclaimant Martin Tripp moves to seal his Notice of Third-Party
2 Deposition of Elon Musk ("Notice") [ECF No. 143] filed contemporaneously with this
3 motion. Pursuant to the October 10, 2018 Protective Order in this case [ECF No. 43] and the
4 Court's December 13, 2019 order [ECF No. 126], the Notice shall be filed under seal due to
5 its confidential nature and the sensitive information contained therein.

6 Tripp therefore requests that the Court grant this motion to seal.

7 DATED this 30th day of January, 2020.

8 TIFFANY & BOSCO, P.A.

9 

10 By _____

11 Robert D. Mitchell
12 William M. Fischbach III
13 Camelback Esplanade II, Seventh Floor
14 2525 East Camelback Road
15 Phoenix, Arizona 85016-4229
16 *Counsel for Defendant/Counterclaimant*

17 **IT IS SO ORDERED**

18 
19 **U.S. MAGISTRATE JUDGE**

20 DATED: 1/31/2020
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

I am employed in the County of Maricopa, State of Arizona. I am over the age of 18 and not a party to the within action; my business address is Tiffany & Bosco, P.A. 2525 E. Camelback Road, Suite 700, Phoenix, Arizona 85016.

On January 30, 2020, I served the following described as:

DEFENDANT/COUNTERCLAIMANT MARTIN TRIPP’S MOTION TO SEAL NOTICE OF THIRD-PARTY DEPOSITION OF ELON MUSK

on the following interested parties in this action:

Rory T. Kay
MCDONALD CARANO LLP
2300 West Sahara Avenue, Suite
1200
Las Vegas, Nevada 89102
rkay@mcdonaldcarano.com
Attorneys for
Plaintiff/Counterdefendant Tesla, Inc.

Alex Spiro
**QUINN EMANUEL URQUHART
& SULLIVAN, LLP**
51 Madison Avenue, 22nd Floor
New York, New York 10010
alexspiro@quinnemanuel.com
Attorney for
Plaintiff/Counterdefendant Tesla, Inc.

Michael Lifrak
Jeanine M. Zalduendo
Alex Bergjans
Aubrey Jones
**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**
865 S. Figueroa Street, 10th Floor
Los Angeles, California 90017
michaellifrak@quinnemanuel.com
jeaninezalduendo@quinnemanuel.com
alexbergjans@quinnemanuel.com
aubreyjones@quinnemanuel.com
Attorney for Plaintiff/Counterdefendant
Tesla, Inc.

(BY E-MAIL) By transmitting the above documents to the above e-mail addresses.

(STATE) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 30th day of January, 2020 at Phoenix, Arizona.

/s/ Kaleigh Stilchen