

NETTLES LAW FIRM
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Henderson, NV 89014
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Electronically Filed
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Case Name: *Seaman vs. City of Las Vegas, et al*
Clerk of the Court

Case Number: *A-17-753515-C*

1 **SPO**
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3 Nevada Bar No. 7462
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20 *Co-Counsel for Plaintiff,*
21 *Victoria Seaman*

DISTRICT COURT

CLARK COUNTY, NEVADA

21 JOHN SEAMAN, an individual ,
22 Plaintiff,
23 vs.

24 CITY OF LAS VEGAS; a municipal
25 corporation; LAS VEGAS PAVING
26 CORPORATION, a Nevada Corporation;
27 SUPERIOR TRAFFIC SERVICES CORP., a
28 Nevada Corporation; TAB
CONTRACTORS, INC., a Nevada
Corporation; DOES 1 through 10; XYZ
CORPORATIONS 11 through 20; and ABC
LIMITED LIABILITY COMPANIES 21

CASE NO.: A-17-753515-C

DEPT NO.: ~~XXX~~ 4

**PLEASE NOTE
DEPARTMENT CHANGE**

**STIPULATED CONFIDENTIALITY
AGREEMENT AND PROTECTIVE
ORDER**

1 through 30,

2 Defendants.

3 VICTORIA SEAMAN, an individual ,

4 Plaintiff,

5 vs.

6 CITY OF LAS VEGAS; a municipal
7 corporation; LAS VEGAS PAVING
8 CORPORATION, a Nevada Corporation;
9 SUPERIOR TRAFFIC SERVICES CORP., a
10 Nevada Corporation; TAB
11 CONTRACTORS, INC., a Nevada
12 Corporation; DOES 1 through 10; XYZ
13 CORPORATIONS 11 through 20; and ABC
14 LIMITED LIABILITY COMPANIES 21
15 through 30,

16 Defendants.

17 TAB CONTRACTORS, INC., a Nevada
18 Corporation,

19 Crossclaim,

20 vs.

21 CITY OF LAS VEGAS; a municipal
22 corporation; LAS VEGAS PAVING
23 CORPORATION, a Nevada corporation;
24 SUPERIOR TRAFFIC SERVICES CORP., a
25 Nevada Corporation,

26 Cross-defendants.

27 TAB CONTRACTORS, INC., a Nevada
28 Corporation;

Third-Party Plaintiff,

vs.

JOHN SEAMAN,

Third-Party Defendant.

LAS VEGAS PAVING CORPORATION, a

1 Nevada Corporation;
2
3 Third-Party Plaintiffs,
4
5 vs.
6
7 JOHN SEAMAN, an individual, and DOES I
8 through X,
9
10 Third-Party Defendant.
11
12 SUPERIOR TRAFFIC SERVICES CORP., a
13 Nevada Corporation,
14
15 Cross-Claimant,
16
17 vs.
18
19 LAS VEGAS PAVING CORPORATION, a
20 Nevada corporation; TAB CONTRACTORS,
21 INC., a Nevada Corporation; ZOES 1
22 through 20 and MOE CORPORATIONS 1
23 through 20
24
25 Cross-defendants.
26
27 SUPERIOR TRAFFIC SERVICES CORP., a
28 Nevada Corporation;
29
30 Third-Party Plaintiff,
31
32 vs.
33
34 JOHN SEAMAN, an individual, and DOES I
35 through X,
36
37 Third-Party Defendant.

38 WHEREAS, Defendants seek to take the deposition of the Plaintiffs, John Seaman and
39 Victoria Seaman;

40 WHEREAS, one or more of the Defendants might seek private and sensitive information
41 during these depositions;

42 WHEREAS, the protection of private and sensitive information is in the public interest;

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1 THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by
2 and through their respective attorneys of records, as follows:
3 1. Deposition transcripts and video for the Plaintiffs, John Seaman and Victoria Seaman,
4 shall not be distributed to any third parties not involved in this litigation;
5 2. Deposition transcripts and video for the Plaintiffs, John Seaman and Victoria Seaman
6 shall only be filed under seal, except that those portions of the deposition transcript
7 directly concerning the subject incident may be filed normally;
8 3. Questions in these depositions shall not unnecessarily intrude into unrelated family
9 matters, political views or political history.

10 STIPULATED AND AGREED:

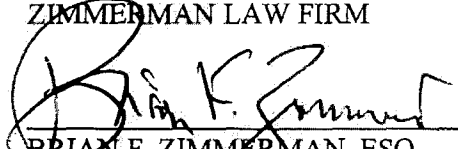
11 DATED this 2 day of August, 2018.

DATED this 2nd day of August, 2018.

12 NETTLES LAW FIRM

ZIMMERMAN LAW FIRM

13
14 



15 BRIAN D. NETTLES, ESQ.
16 Nevada Bar No. 7462
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24 *John Seaman, and Plaintiff,*
25 *Victoria Seaman*

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*Attorneys for Defendant/Cross-
Defendant/CrossClaimant/Third-Party
Plaintiff, Superior Traffic Services, Corp.*

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DATED this 2nd day of August, 2018.

KOLESAR & LEATHAM



SCOTT R. COOK, ESQ.
Nevada Bar No. 5265
JENNIFER L. MICHELI, ESQ.
Nevada Bar No. 11210
400 S. Rampart Street, Suite 400
Las Vegas, Nevada 89145
*Attorneys for Defendants,
TAB Contractors, Inc. and
City of Las Vegas*

DATED this ____ day of August, 2018.

MARQUIS AURBACH COFFING

CRAIG R. ANDERSON, ESQ.
Nevada Bar No. 6882
TYE S. HANSEEN, ESQ.
Nevada Bar No. 10365
10001 Park Run Drive
Las Vegas, Nevada 89145
*Attorneys for Defendant/Cross-
Defendant/Third-Party Plaintiff, Las Vegas
Paving Corporation*

IT IS SO ORDERED this 10th day of August, 2018.



DISTRICT COURT JUDGE *ACS*

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DATED this ____ day of August, 2018.

DATED this 2 day of August, 2018.

KOLESAR & LEATHAM

MARQUIS AURBACH COFFING

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10001 Park Run Drive
Las Vegas, Nevada 89145
*Attorneys for Defendant/Cross-
Defendant/Third-Party Plaintiff, Las Vegas
Paving Corporation*

IT IS SO ORDERED this ____ day of _____, 2018.

DISTRICT COURT JUDGE