*Attachment 13*

Per the Court Document: Brown, Case No. 03.10-cv-00679-ECR-VPC - Settlement Agreement and Full and Final Release, pages 11- 14 (attached) the following documents Ms. Brown submitted for the record are confidential and have been removed from Attachment 2:

Bates Stamp NDOC 00028 is confidential, see page 11 of Settlement Agreement.
Bates Stamp NDOC 03854 is confidential, see page 13 of Settlement Agreement;
Bates Stamp NDOC 03856 is confidential, see page 13 of Settlement Agreement;
Bates Stamp NDOC 03857 is confidential, see page 13 of Settlement Agreement;
Bates Stamp NDOC 03858 is confidential, see page 13 of Settlement Agreement;
Bates Stamp NDOC 03935 is confidential, see page 13 of Settlement Agreement

This AGREEMENT shall be construed, interpreted, and enforced in accordance with federal laws, rules of procedure, and common law in the Ninth Circuit, except where state law controls or governs this AGREEMENT, or any portion thereof. Where state law is to be applied, this AGREEMENT, or the relevant portions thereof, shall be construed, interpreted, and enforced in accordance with the controlling legal authority, whether laws, rules of procedure, and/or common law, of the State of Nevada.

**L. ADDITIONAL DOCUMENTS and RELATED STATEMENT**

Each party agrees in good faith to cooperate fully and execute any and all supplementary documents that are necessary or proper to give full force and effect to this Agreement.

**M. CONFIDENTIALITY OF DOCUMENTS**

Defendants produced certain documents in the course of discovery of this litigation, spanning the "Bates" range of **NDOC 00001-04213**. The parties herein agree that some of those documents are confidential ("CONFIDENTIAL DOCUMENTS"), as specified in the table below, for which documents the Plaintiffs and their counsel agree that they will not disclose, disseminate, or produce the CONFIDENTIAL DOCUMENTS, or the information contained therein, to any third party, absent written permission by the NDOC or a court order permitting the same. The parties herein identify those CONFIDENTIAL DOCUMENTS, or portions thereof requiring redaction, as set forth in the table below and as required by NRS 213.1075;

| ITEM | BATES STAMP RANGE | INSTRUCTIONS ON CONFIDENTIALITY |
|---|---|---|
| 01 | NDOC 00027-00036 | **REDACTION OF CONFIDENTIAL INFORMATION REQUIRED**: any text which identifies by name, relationship (*e.g.*, "cellie" or cellmate), or NDOC Identification or "Back" No. any inmate *other than Nolan Klein or Fred Huston* |

| ITEM | BATES STAMP RANGE | INSTRUCTIONS ON CONFIDENTIALITY |
|---|---|---|
| | | must be redacted and kept confidential before publication or dissemination, including that which appears on the following pages:<br>• NDOC 00031;<br>• NDOC 00033;<br>• NDOC 00034; and<br>• NDOC 00035. |
| 02 | NDOC 01088-01094 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 03 | NDOC 01643-01703 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 04 | NDOC 01709-01711 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 05 | NDOC 01868-01889 | **REDACTION OF CONFIDENTIAL INFORMATION REQUIRED**: any text which identifies by name, relationship (*e.g.*, "cellie" or cellmate), or NDOC Identification or "Back" No. any inmate *other than Nolan Klein or Fred Huston* must be redacted and kept confidential before publication or dissemination, including that which appears on the following pages:<br>• NDOC 1877<br>• NDOC 1878 |
| 06 | NDOC 03703-03712 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 07 | NDOC 03713 | **REDACTION OF CONFIDENTIAL INFORMATION REQUIRED**: any text which identifies by name, relationship (*e.g.*, "cellie" or cellmate), or NDOC Identification or "Back" No. any inmate *other than Nolan Klein or Fred Huston* must be redacted and kept confidential before publication or dissemination, including that which appears on this page. |
| 08 | NDOC 03715-03753 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 09 | NDOC 03755-03769 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 10 | NDOC 03772 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 11 | NDOC 03774-03780 | **CONFIDENTIAL** – MAY NOT BE PRODUCED |

| ITEM | BATES STAMP RANGE | INSTRUCTIONS ON CONFIDENTIALITY |
|---|---|---|
| | | OR DISSEMINATED IN PART OR WHOLE. |
| 12 | NDOC 03782-03793 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 13 | NDOC 03795-03806 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 14 | NDOC 03808-03809 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 15 | NDOC 03812-03813 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 16 | NDOC 03815 | **REDACTION OF CONFIDENTIAL INFORMATION REQUIRED**: any text which identifies by name, relationship *e.g.*, "cellie" or cellmate), or NDOC Identification or "Back" No. any inmate *other than Nolan Klein (and by relationship to Nolan Klien, Tonja Brown) or Fred Huston* must be redacted and kept confidential before publication or dissemination, including that which appears on this page. |
| 17 | NDOC 03816-03817 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 18 | NDOC 03820 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 19 | NDOC 03822-03828 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 20 | NDOC 03830-03841 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 21 | NDOC 03843-03870 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 22 | NDOC 03873-03874 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 23 | NDOC 03882-03885 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 24 | NDOC 03891-03893 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 25 | NDOC 03896-03906 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 26 | NDOC 03920-03937 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 27 | NDOC 03940 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 28 | NDOC 03943-03962 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |

| ITEM | BATES STAMP RANGE | INSTRUCTIONS ON CONFIDENTIALITY |
|---|---|---|
| 29 | NDOC 03951-03962 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 30 | NDOC 03964-03972 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 31 | NDOC 03970-03973 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |
| 32 | NDOC 03987 | **REDACTION OF CONFIDENTIAL INFORMATION REQUIRED**: the following information and text must be redacted and kept confidential before publication or dissemination, including that which appears on this page.<br><br>Line 4: the phone number appearing immediately after the name "Karen Walsh"<br><br>Lines 17-22: the entire entry beginning with the word "Rex" and ending in the words "settle the matter." |
| 33 | NDOC 03988-03998 | **CONFIDENTIAL** – MAY NOT BE PRODUCED OR DISSEMINATED IN PART OR WHOLE. |

All CONFIDENTIAL DOCUMENTS in the possession, custody, or control of Plaintiffs, Plaintiff's Counsel, or their agents will be withheld under safekeeping, sealed, or destroyed by the parties or their counsel's office.

## N. CLAWBACK OF CONFIDENTIAL DOCUMENTS

To the degree that Plaintiff has already disseminated any of the CONFIDENTIAL DOCUMENTS, Plaintiffs will use good faith efforts to attempt to have such CONFIDENTIAL DOCUMENTS and all known copies of the same—whether existing in paper, electronic, or other form—returned from the party to whom such documents were originally given, whereupon, the CONFIDENTIAL DOCUMENTS will be maintained as confidential, as herein provided. Plaintiff's counsel has not disseminated any documents except in the process of preparing for litigation.