

1 GLANCY PRONGAY & MURRAY LLP  
 2 Marc L. Godino (admitted *pro hac vice*)  
 3 Kara M. Wolke (admitted *pro hac vice*)  
 4 1925 Century Park East, Suite 2100  
 5 Los Angeles, California 90067  
 Telephone: (310) 201-9150  
 Facsimile: (310) 201-9160  
 info@glancylaw.com

LEWIS BRISBOIS BISGAARD & SMITH LLP  
 Robert W. Freeman (Nevada Bar No. 003062)  
 Danielle C. Miller (Nevada Bar No. 009127)  
 6385 . Rainbow Boulevard, Suite 600  
 Las Vegas, Nevada 89118  
 Telephone: (702) 893-3383  
 Facsimile: (702) 893-3789  
 robert.freeman@lewisbrisbois.com  
 danielle.miller@lewisbrisbois.com

6 *Attorneys for Plaintiffs*

*Attorneys for Defendants*

7 *[Additional counsel on signature page]*

8  
 9 **UNITED STATES DISTRICT COURT**  
 10 **FOR THE DISTRICT OF NEVADA**

11 DANIEL SMALL, CAROLYN SMALL,  
 12 WILLIAM CURTIN, DAVID COHEN,  
 13 LANETTE LAWRENCE and LOUISE  
 COLLARD, Individually and on Behalf of  
 All Other Persons Similarly Situated,

14 Plaintiffs,

15 v.

16 UNIVERSITY MEDICAL CENTER OF  
 17 SOUTHERN NEVADA, a political  
 18 subdivision of Clark County, State of  
 Nevada, CLARK COUNTY, a political  
 19 subdivision of the State of Nevada, and  
 JOHN ESPINOZA, an individual,

20 Defendants.

CASE NO. 2-13-cv-00298-APG-PAL

21 **JOINT STIPULATION REGARDING**  
**ADMISSIBILITY OF DEPOSITION**  
**TESTIMONY AND EXHIBITS FROM**  
**THE MATTER OF LEE v. UMC, CASE**  
**No. 2:14-cv-00328-JCM-CWH**

22 Date Action Filed: July 27, 2012  
 23 Trial Date: TBD

24 Counsel for Plaintiffs and Counsel for Defendants hereby stipulate that:

25 The parties to this action, by and through their counsel, stipulate and agree that the  
 26 prior deposition testimony of John Espinoza, Doug spring, Jackie Panzeri, Shaunda  
 27 Phillips and James Mumford from the *Lee v. UMC* matter (Case No. 2:14-cv-00328-

1 JCM-CWH) may be used in this matter for any purpose, as long as such deposition  
2 testimony is otherwise admissible under the rules of evidence that would apply if the  
3 deponent were testifying live in Court.  
4

5  
6 Respectfully submitted this 13th day of July, 2018.

7 GLANCY PRONGAY & MURRAY LLP    LEWIS BRISBOIS BISGAARD & SMITH LLP

8 By: /s/ Marc L. Godino

9     Marc L. Godino (admitted *pro hac vice*)

10 Kara M. Wolke (admitted *pro hac vice*)

11 1925 Century Park East, Suite 2100

12 Los Angeles, California 90067

13 Telephone: (310) 201-9150

14 Facsimile: (310) 201-9160

15 Email: info@glancylaw.com

8 By: /s/ Danielle C. Miller

9     Danielle C. Miller (Nevada Bar No. 009127)

10 Robert W. Freeman (Nevada Bar No. 003062)

11 6385 Rainbow Boulevard, Suite 600

12 Las Vegas, Nevada 89118

13 Telephone: (702) 893-3383

14 Facsimile: (702) 893-3789

15 Email: robert.freeman@lewisbrisbois.com

16 Email: danielle.miller@lewisbrisbois.com

17 *Attorneys for Defendants*

18 TOSTRUD LAW GROUP, P.C.

19 Jon A. Tostrud (admitted *pro hac vice*)

20 Anthony M. Carter (admitted *pro hac vice*)

21 1925 Century Park East, Suite 2100

22 Los Angeles, California 90067

23 Telephone: (310) 278-2600

24 Facsimile: (310) 278-2640

25 Email: jtostrud@tostrudlaw.com

26 Email: acarter@tostrudlaw.com

27 THE O'MARA LAW FIRM, P.C.

28 David C. O'Mara (NV Bar #8599)

311 E. Liberty Street

Reno, Nevada 89501

Telephone: (775) 323-1321

Facsimile: (775) 323-4082

Email: david@omaralaw.net

1 REMPFER MOTT LUNDY, PLLC

2 Joseph Mott, Esq.

3 10091 Park Run Dr., Ste. 200

4 Las Vegas, NV 89145-8868

5 Telephone: (702) 825-5303

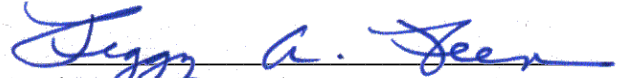
6 Facsimile: (702) 825-4413

7 Email: andrew@rmllegal.com

8 *Co-Counsel to Plaintiffs*

9 IT IS SO ORDERED.

10 DATED: July 18, 2018



11 The Hon. Peggy A. Leen

12 United States Magistrate Judge

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 BY ELECTRONIC POSTING**

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On July 13, 2018, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the District of Nevada, for receipt electronically by the parties listed on the Court’s Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 13, 2018, at Los Angeles, California.

*s/ Marc L. Godino* \_\_\_\_\_  
Marc L. Godino

## Mailing Information for a Case 2:13-cv-00298-APG-PAL Small et al v. University Medical Center of Southern Nevada

### Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Anthony M. Carter**  
acarter@tostrudlaw.com
- **Robert W Freeman , Jr**  
robert.freeman@lewisbrisbois.com,kristen.freeman@lewisbrisbois.com,keltic73@msn.com
- **Lionel Z. Glancy**  
INFO@GLANCYLAW.COM,lglancy@glancylaw.com
- **Marc L. Godino**  
mgodino@glancylaw.com,marc-godino-1414@ecf.pacerpro.com
- **Danielle Miller**  
danielle.miller@lewisbrisbois.com,tiffany.dube@lewisbrisbois.com,pamela.january@lewisbrisbois.com
- **Joseph Nathan Mott**  
joey@rmllegal.com,scott@rmllegal.com,erica@sjplawyer.com,candice@sjplawyer.com
- **William M. O'Mara**  
bill@omaralaw.net,val@omaralaw.net,david@omaralaw.net
- **David C OMara**  
david@omaralaw.net,val@omaralaw.net,bsnyder@omaralaw.net
- **Joseph M. Ortuno**  
jortuno@edbernstein.com
- **Andrew L Rempfer**  
andrew@rmllegal.com,scott@rmllegal.com,info@rmllegal.com,joey@rmllegal.com,erica@sjplawyer.com,candice@sjplawyer.com
- **Kevin F. Ruf**  
kevinruf@gmail.com
- **Jon A Tostrud**  
jtostrud@tostrudlaw.com,mvog1@tostrudlaw.com,acarter@tostrudlaw.com
- **Cayla Witty**  
caylawitty@gmail.com,heidi.davis@lewisbrisbois.com,pamela.january@lewisbrisbois.com
- **Kara M Wolke**  
kwolke@glancylaw.com,kara-wolke-0535@ecf.pacerpro.com

### Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

**Daniel Garrie**  
6506 3rd Avenue  
Suite C  
Seattle, WA 98117

**Raymond**

**B. Walton**

3381 Violet Lantern  
Dana Point, CA 92629