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	•	DISTRICT COURT
9	DISTRICT (DF NEVADA
10		
11	RUTH QUIMBY,	Case No.: 2:19-cv-02181-JCM-NJK
12	Plaintiff,	
13	vs.	JOINT PRE-TRIAL ORDER
14		
	MICHAEL STEVENS, individually; PINNACLE HEAVY HAUL INC., an Indiana	
15	Corporation; DOES I through X, inclusive; and	
16	ROE CORPORATIONS I through X, inclusive,	
17	Defendants.	
18		
19	After pretrial proceedings in this case,	
20	IT IS ORDERED:	
21	I. INTRODUCTION	
22	1. This is a motor vehicle incident case that	occurred on or about November 16, 2017.
23	Plaintiff alleges Defendant MICHAEL STEVE	NS was driving a vehicle owned by Defendant
24		
25	PINNACLE HEAVY HAUL. Based upon info	ormation and belief, at the time of the car crash,
26	Defendant was acting within the course and sco	ope of his employment. Plaintiff and Defendant
27	were traveling east on SR 17, at the Northbound/	Sunset Road off Ramp. Plaintiff was allegedly in
28	the Number one (1) left turn lane. Defendant wa	as allegedly in the Number two (2) left turn lane.
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1	As Defendant	attempted to pass Plaintiff, Defendant allegedly failed to maintain his travel lane and
2	struck the left	side of Plaintiff's vehicle. Defendant has offered additional affirmative defenses as
3	part of its plea	dings in this action, and Defendant reserves the right to rely on the pleadings on file
4	in this action	to articulate its contentions in this case.
5	II. STAT	EMENT OF JURISDICTION:
6 7	This a	ction was originated by the filing of a Complaint in the District Court, Clark County,
8	Nevada on Se	ptember 11, 2019. Defendants Answered the Complaint on October 30, 2019 and
9		case from State Court to Federal Court on December 18, 2019, citing diversity
10		arties and that this Court has jurisdiction of the matter under 28 U.S.C. § 1332 and
11	28 U.S.C § 14	
12		
13		llowing facts are admitted by the parties and require no proof: None at this time.
14	2. The fo	llowing facts are admitted by the parties and require no proof: None at this time.
15	3. The fo	llowing are issues of fact to be tried and determined at trial:
16	<u>PLAINTIFF</u>	
17	1.	Whether Defendant breached a duty of care owed to Plaintiff.
18	2.	The nature, extent and value of Plaintiff's accident-related damages.
19	DEFENDAN	<u>T:</u>
20	1.	Whether Defendant was negligent at the time of the incident which forms the basis
21 22		of this litigation.
22	2.	Whether Defendant Michael Stevens was negligent in the operation of his motor
23 24		vehicle at the time of the incident which forms the basis of this litigation.
25	3.	Whether such negligence, if any, was a proximate cause of Plaintiff
26		RUTH QUIMBY alleged injuries.
27	4.	Whether Plaintiff RUTH QUIMBY was comparatively negligent at the time of
28	т.	
THE702FIRM	l	the incident which forms the basis of this litigation. 2

1	1	
1	5.	Whether the comparative negligence of Plaintiff RUTH QUIMBY, if any,
2		was a proximate cause of Plaintiff RUTH QUIMBY'S alleged injuries and
3		damages.
4	6.	Whether the comparative negligence of Plaintiff RUTH QUIMBY, if any, is
5		greater than the negligence of the Defendant, if any.
6	7.	Whether Plaintiff RUTH QUIMBY expressly assumed whatever risk or
7		hazard existed at the time of the alleged incident, if any.
8		
9	8.	Whether Plaintiff RUTH QUIMBY, by assuming the risk or hazard that existed
10		at the time of the alleged incident, if any, was therefore responsible for the
11		alleged injuries suffered, if any.
12	9.	Whether Plaintiff RUTH QUIMBY was involved in a prior accident or other form
13		of traumatic event.
14 15	10.	Whether any prior accident or other form of traumatic event involving Plaintiff
15 16		RUTH QUIMBY, if any, caused the injuries of which he complains in this
10		litigation.
18		
10 19	11.	Whether the occurrence which is the subject matter of this action was avoidable.
19 20	12.	Whether the occurrence which is the subject matter of this action was unavoidable
20 21	13.	Whether the occurrence which is the subject matter of this action was caused in
22		whole or in part by the actions of a third party, outside of the control of any party
23		to this litigation.
24	14.	Whether the occurrence which is the subject matter of this action was caused in
25		whole or in part by the negligence of a third party, outside of the control of any
26		party to this litigation.
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1	1	
1	15.	The percentage of reduction for the amount of damages that is
2		commensurate with the comparative negligence, in any, of Plaintiff RUTH
3		QUIMBY.
4	16.	Whether Plaintiff RUTH QUIMBY suffered injuries to her head, neck, back,
5		spine or upper and/or lower extremities or any parts of her body in which she
6		claims injury resulting from the incident which forms the basis of this litigation.
7 •	17.	Whether Plaintiff RUTH QUIMBY suffered monetary damages in the form of past
8 9		medical expenses stemming from injuries resulting from the incident which forms
10		
11		the basis of this litigation.
12	18.	The amount of monetary damages in the form of past medical expenses, if
13		any, Plaintiff RUTH QUIMBY suffered from injuries as a proximate result
14		of this accident.
15	19.	Whether Plaintiff RUTH QUIMBY will continue to suffer monetary damages in
16		the future in the form of medical expenses stemming from injuries resulting from
17		the incident which forms the basis of this litigation.
18	20.	The amount of monetary damages in the form of future medical expenses, if
19		any, Plaintiff RUTH QUIMBY will suffer from injuries as a proximate result
20		of this accident.
21	21.	Whether Plaintiff RUTH QUIMBY suffered monetary damages in the form of
22	21.	past lost wages stemming from injuries resulting from the incident which forms
23		
24		the basis of this litigation.
25 26	22.	The amount of monetary damages in the form of past lost wages, if any, Plaintiff
26 27		RUTH QUIMBY suffered from injuries as a proximate result of this accident.
27 28		
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1	23.	Whether Plaintiff RUTH QUIMBY will suffer monetary damages in the form of
2		future lost wages stemming from injuries resulting from the incident which forms
		the basis of this litigation.
	24.	The amount of monetary damages in the form of future lost wages, if any,
		Plaintiff RUTH QUIMBY will suffer from injuries as a proximate result of this
		accident.
	25.	Whether Plaintiff RUTH QUIMBY suffered monetary damages in the form of
		past loss of enjoyment of life, if any, Plaintiff RUTH QUIMBY suffered from
		injuries as a proximate result of this accident.
	26.	The amount of monetary damages in the form of past loss of enjoyment of life,
		if any, Plaintiff RUTH QUIMBY suffered as a result of injuries as a proximate
		result of this accident.
	27.	Whether Plaintiff RUTH QUIMBY will suffer monetary damages in the form
		of future loss of enjoyment of life, if any, Plaintiff RUTH QUIMBY suffered
		from injuries to his body as a proximate result of this accident.
	28.	The amount of monetary damages in the form of future loss of enjoyment of
		life, if any, Plaintiff RUTH QUIMBY will suffer as a result of injuries as a
		proximate result of this accident.
	29.	Whether Plaintiff RUTH QUIMBY suffered injuries to her spine resulting from
		the incident which forms the basis of this litigation.
	30.	Whether Plaintiff RUTH QUIMBY suffered monetary damages in the form of
		past medical expenses stemming from injuries resulting from the incident which
		forms the basis of this litigation.
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1	1	
1	31.	The amount of monetary damages in the form of past medical expenses, if
2		any, Plaintiff RUTH QUIMBY suffered from injuries as a proximate result of
3		this accident.
4	32.	Whether Plaintiff RUTH QUIMBY will continue to suffer monetary damages in
5		the future in the form of medical expenses stemming from injuries resulting from
6		the incident which forms the basis of this litigation.
7 8	33.	The amount of monetary damages in the form of future medical expenses, if any,
o 9		Plaintiff RUTH QUIMBY will suffer from injuries to his spine as a proximate
10		
		result of this accident.
11 12	34.	Whether Plaintiff RUTH QUIMBY suffered monetary damages in the form of
12		past lost wages stemming from injuries to his spine resulting from the incident
13		which forms the basis of this litigation.
15	35.	The amount of monetary damages in the form of past lost wages, if any, Plaintiff
16		RUTH QUIMBY suffered from injuries to his spine as a proximate result of this
17		accident.
18	36.	Whether Plaintiff RUTH QUIMBY will suffer monetary damages in the form of
19		future lost wages stemming from injuries to his spine resulting from the incident
20		which forms the basis of this litigation.
21		
22	37.	The amount of monetary damages in the form of future lost wages, if any,
23		Plaintiff RUTH QUIMBY will suffer from injuries as a proximate result of this
24		accident.
25	38.	Whether Plaintiff RUTH QUIMBY suffered monetary damages in the form of
26		past loss of enjoyment of life, if any, Plaintiff RUTH QUIMBY suffered from
27		injuries as a proximate result of this accident.
28		
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I	I	
1	39.	The amount of monetary damages in the form of past loss of enjoyment of life, if
2		any, Plaintiff RUTH QUIMBY suffered as a result of injuries as a proximate
3		result of this accident.
4	40.	Whether Plaintiff RUTH QUIMBY will suffer monetary damages in the form
5		of future loss of enjoyment of life, if any, Plaintiff suffered from injuries to his
6		spine as a proximate result of this accident.
7 8	41.	The amount of monetary damages in the form of future loss of enjoyment of
9		life, if any, Plaintiff RUTH QUIMBY will suffer as a result of injuries as a
10		
11		proximate result of this accident.
	42.	Whether Plaintiff RUTH QUIMBY failed to mitigate her damages.
12 13	43.	Whether Plaintiff RUTH QUIMBY suffered from any pre-existing injuries
13		and problems at the time of the incident which forms the basis of this
15		litigation.
16	44.	Whether Plaintiff RUTH QUIMBY's medical costs for treatment derived from
17		unreasonable or unnecessary treatment
18	45.	Whether Plaintiff RUTH QUIMBY's medical costs for treatment were usual
19		and customary in the Las Vegas community.
20	46.	Whether Plaintiff RUTH QUIMBY's medical costs for treatment were
21		
22		presented solely to improperly attempt to increase the value of this case.
23	47.	Whether Plaintiff RUTH QUIMBY's alleged injuries were the result of a
24		superseding intervening cause.
25	48.	Whether Plaintiff RUTH QUIMBY suffered from any pre-existing injuries
26		and problems at the time of the incident which forms the basis of this
27		litigation.
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1		49.	Whether Plaintiff RUTH QUIMBY's medical costs for treatment derived from
2			unreasonable or unnecessary treatment
3		50.	Whether Plaintiff RUTH QUIMBY's medical costs for treatment were usual and
4			customary in the Las Vegas community.
5		51.	Whether Plaintiff RUTH QUIMBY's medical costs for treatment were presented
6 7			solely to improperly attempt to increase the value of this case.
8		52.	Whether Defendants were negligent and whether such negligence was a proximate
9			cause of Plaintiff RUTH QUIMBY's alleged injuries and alleged damages.
10		53.	Whether Plaintiff RUTH QUIMBY was comparatively negligent in causing the
11			subject accident.
12		54.	Whether the comparative negligence of Plaintiff RUTH QUIMBY, if any, is
13		54.	
14			greater than the negligence of the Defendants, if any.
15		55.	The percentage of reduction for the amount of damages that is commensurate with
16			the comparative negligence, in any, of Plaintiff RUTH QUIMBY.
17		56.	The percentage of reduction for the amount of damages that is commensurate with
18			the comparative negligence, in any, of Plaintiff RUTH QUIMBY.
19		57.	The percentage of reduction for the amount of damages that is commensurate with
20			the comparative negligence, in any, of Plaintiff RUTH QUIMBY.
21		58.	The extent and value of Plaintiff's damages (including past and future pain and
22			
23	suffer	ng) rel	ated to the incident, if any, and as permitted by Court orders regarding admissibility.
24	III.		FOLLOWING ARE ISSUES OF LAW TO BE TRIED AND DETERMINED RIAL:
25		1.	Duty
26			-
27		2.	Breach
28		3.	Causation
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1	I	
1	4.	Damages
2	5.	The issues of law raised in the parties' anticipated Motions in Limine.
3	6.	The issues of law raised by the parties at trial.
4	7.	Whether Defendant was negligent at the time of the incident which forms the basis
5		of this litigation.
6	8.	Whether such negligence, if any, was a proximate cause of Plaintiff's alleged
7 8		injuries and alleged damages.
8 9	9.	Whether Plaintiff failed to operate her vehicle in a safe and reasonable manner at
10		the time of the subject incident.
11	10	
12	10.	Whether the subject collision proximately caused injuries to Plaintiff.
13	11.	Whether Plaintiff was comparatively negligent at the time of the incident which
14		forms the basis of this litigation.
15	12.	Whether the comparative negligence of Plaintiff, if any, was a proximate cause of
16		Plaintiff's alleged injuries and alleged damages.
17	13.	Whether the comparative negligence of Plaintiff, if any, is greater than the
18		negligence of the Defendant, if any.
19	14.	Whether any risks and dangers involved in the factual situation set forth in the
20		Complaint, if any, were open and obvious to Plaintiff.
21	15.	Whether Plaintiff was involved in a prior accident or other form of traumatic event.
22	16.	Whether any prior accident or other form of traumatic event involving Plaintiff, if
23	10.	
24 25	17	any, caused the injuries of which he complains in this litigation.
25 26	17.	Whether the occurrence which is the subject matter of this action was avoidable.
20 27	18.	Whether the occurrence which is the subject matter of this action was unavoidable.
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1	1	
1	19.	Whether the occurrence which is the subject matter of this action was caused in
2		whole or in part by the actions of a third party, outside of the control of any party
3		to this litigation.
4	20.	Whether the occurrence which is the subject matter of this action was caused in
5		whole or in part by the negligence of a third party, outside of the control of any
6 7		party to this litigation.
8	21.	The percentage of reduction for the amount of damages that is commensurate
9		with the comparative negligence, in any, of Plaintiff.
10	22.	Whether Plaintiff suffered injuries resulting from the incident which forms the
11	22.	
12		basis of this litigation.
13	23.	Whether Plaintiff suffered monetary damages in the form of past medical expenses
14		stemming from alleged injuries resulting from the incident which forms the basis
15		of this litigation.
16	24.	The amount of monetary damages in the form of past medical expenses, if any,
17		Plaintiff suffered from alleged injuries as a proximate result of this accident.
18	25.	Whether Plaintiff will continue to suffer monetary damages in the future in the
19		form of medical expenses stemming from alleged injuries resulting from the
20		incident which forms the basis of this litigation.
21		
22 23	26.	The amount of monetary damages in the form of future medical expenses, if
23 24		any, Plaintiff will suffer from alleged injuries as a proximate result of this
25	27	accident.
26	27.	Whether Plaintiff suffered monetary damages in the form of past lost wages
27		stemming from injuries resulting from the incident which forms the
28		basis of this litigation.
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1	28.	The amount of monetary damages in the form of past lost wages, if any, Plaintiff
2		suffered from injuries as a proximate result of this accident.
3	29.	Whether Plaintiff will suffer monetary damages in the form of future lost wages
4		stemming from injuries resulting from the incident which forms the basis of this
5		litigation.
6	30.	The amount of monetary damages in the form of future lost wages, if any,
7		Plaintiff will suffer from injuries as a proximate result of this accident.
8 9	31.	Whether Plaintiff suffered monetary damages in the form of past loss of
9 10		enjoyment of life, if any, Plaintiff suffered from injuries as a proximate result of
10	th	is accident.
11	32.	The amount of monetary damages in the form of past loss of enjoyment of life,
13		if any, Plaintiff suffered as a result of injuries as a proximate result of this
14	ac	ccident.
15	33.	Whether Plaintiff will suffer monetary damages in the form of future loss of
16		enjoyment of life, if any, Plaintiff suffered from injuries as a
17		proximate result of this accident.
18	34.	The amount of monetary damages in the form of future loss of enjoyment of
19		life, if any, Plaintiff will suffer as a result of injuries as a proximate result
20		of this accident.
21	35.	Whether Plaintiff suffered injuries to her body, including, but not limited to her,
22	55.	spine resulting from the incident which forms the basis of this litigation.
23	36.	Whether Plaintiff suffered monetary damages in the form of past medical
24	50.	
25		expenses stemming from alleged injuries resulting from the incident which
26		forms the basis of this litigation.
27		
28		
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 40. 41. 42. 43. 44. 45. 	 Whether Plaintiff suffered monetary damages in the form of past lost wages stemming from injuries to his spine resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of past lost wages, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. Whether Plaintiff will suffer monetary damages in the form of future lost wages stemming from injuries allegedly resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of future lost wages, if any, Plaintiff will suffer from injuries allegedly as a proximate result of this accident. Whether Plaintiff suffered monetary damages in the form of past loss of enjoyment of life, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. The amount of monetary damages in the form of past loss of enjoyment of life, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. The amount of monetary damages in the form of past loss of enjoyment of life, if any, Plaintiff suffered as a result of injuries allegedly as a proximate result of this accident.
 41. 42. 43. 44. 	stemming from injuries to his spine resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of past lost wages, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. Whether Plaintiff will suffer monetary damages in the form of future lost wages stemming from injuries allegedly resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of future lost wages, if any, Plaintiff will suffer from injuries allegedly as a proximate result of this accident. Whether Plaintiff suffered monetary damages in the form of past loss of enjoyment of life, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. The amount of monetary damages in the form of past loss of enjoyment of life, if any, Plaintiff suffered as a result of injuries allegedly as a proximate result of this
 41. 42. 43. 44. 	 stemming from injuries to his spine resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of past lost wages, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. Whether Plaintiff will suffer monetary damages in the form of future lost wages stemming from injuries allegedly resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of future lost wages, if any, Plaintiff will suffer from injuries allegedly as a proximate result of this accident. Whether Plaintiff suffered monetary damages in the form of past loss of enjoyment of life, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. The amount of monetary damages in the form of past loss of enjoyment of life, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident.
 41. 42. 43. 44. 	stemming from injuries to his spine resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of past lost wages, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. Whether Plaintiff will suffer monetary damages in the form of future lost wages stemming from injuries allegedly resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of future lost wages, if any, Plaintiff will suffer from injuries allegedly as a proximate result of this accident. Whether Plaintiff suffered monetary damages in the form of past loss of enjoyment of life, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. The amount of monetary damages in the form of past loss of enjoyment of life, if any, Plaintiff suffered as a result of injuries allegedly as a proximate result of this
 41. 42. 43. 44. 	stemming from injuries to his spine resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of past lost wages, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. Whether Plaintiff will suffer monetary damages in the form of future lost wages stemming from injuries allegedly resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of future lost wages, if any, Plaintiff will suffer from injuries allegedly as a proximate result of this accident. Whether Plaintiff suffered monetary damages in the form of past loss of enjoyment of life, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. The amount of monetary damages in the form of past loss of enjoyment of life, if
 41. 42. 43. 44. 	stemming from injuries to his spine resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of past lost wages, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. Whether Plaintiff will suffer monetary damages in the form of future lost wages stemming from injuries allegedly resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of future lost wages, if any, Plaintiff will suffer from injuries allegedly as a proximate result of this accident. Whether Plaintiff suffered monetary damages in the form of past loss of enjoyment of life, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident.
41. 42. 43.	stemming from injuries to his spine resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of past lost wages, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. Whether Plaintiff will suffer monetary damages in the form of future lost wages stemming from injuries allegedly resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of future lost wages, if any, Plaintiff will suffer from injuries allegedly as a proximate result of this accident. Whether Plaintiff suffered monetary damages in the form of past loss of enjoyment of life, if any, Plaintiff suffered from injuries allegedly as a proximate
41. 42. 43.	stemming from injuries to his spine resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of past lost wages, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. Whether Plaintiff will suffer monetary damages in the form of future lost wages stemming from injuries allegedly resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of future lost wages, if any, Plaintiff will suffer from injuries allegedly as a proximate result of this accident. Whether Plaintiff suffer damages in the form of future lost wages, if any,
41. 42. 43.	stemming from injuries to his spine resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of past lost wages, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. Whether Plaintiff will suffer monetary damages in the form of future lost wages stemming from injuries allegedly resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of future lost wages, if any, Plaintiff will suffer from injuries allegedly as a proximate result of this accident.
41. 42.	stemming from injuries to his spine resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of past lost wages, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. Whether Plaintiff will suffer monetary damages in the form of future lost wages stemming from injuries allegedly resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of future lost wages, if any,
41. 42.	stemming from injuries to his spine resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of past lost wages, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. Whether Plaintiff will suffer monetary damages in the form of future lost wages stemming from injuries allegedly resulting from the incident which forms the basis of this litigation.
41.	stemming from injuries to his spine resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of past lost wages, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. Whether Plaintiff will suffer monetary damages in the form of future lost wages stemming from injuries allegedly resulting from the incident which forms the basis
41.	stemming from injuries to his spine resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of past lost wages, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident. Whether Plaintiff will suffer monetary damages in the form of future lost wages
41.	stemming from injuries to his spine resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of past lost wages, if any, Plaintiff suffered from injuries allegedly as a proximate result of this accident.
	stemming from injuries to his spine resulting from the incident which forms the basis of this litigation. The amount of monetary damages in the form of past lost wages, if any, Plaintiff
	stemming from injuries to his spine resulting from the incident which forms the basis of this litigation.
40.	stemming from injuries to his spine resulting from the incident which forms the
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40	Whether Plaintiff suffered monetary damages in the form of past lost wages
	series non injeries us a provintate result of this decident.
	Plaintiff will suffer from injuries as a proximate result of this accident.
39	The amount of monetary damages in the form of future medical expenses, if any,
	incident which forms the basis of this litigation.
201	form of medical expenses stemming from injuries allegedly resulting from the
38	Whether Plaintiff will continue to suffer monetary damages in the future in the
	accident.
57.	any, Plaintiff suffered from alleged injuries as a proximate result of this
37	The amount of monetary damages in the form of past medical expenses, if
	37. 38. 39.

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I	1		
1		46.	Whether Plaintiff will suffer monetary damages in the form of future loss of
2			enjoyment of life, if any, Plaintiff suffered from injuries as a proximate result
3			of this accident.
4		47.	The amount of monetary damages in the form of future loss of enjoyment of
5			life, if any, Plaintiff will suffer as a result of injuries allegedly as a
6			proximate result of this accident.
7		48.	Whether Plaintiff failed to mitigate her damages.
8		49.	Whether Plaintiff suffered from any pre-existing injuries and problems in her
9 10			body at the time of the incident which forms the basis of this litigation.
10		50.	Whether Plaintiff's medical costs for treatment derived from unreasonable or
11 12			unnecessary treatment.
12		51.	Whether Plaintiff's medical costs for treatment were usual and customary in the
14			Las Vegas community.
15		52.	Whether Plaintiff's medical costs for treatment were presented solely to
16			nproperly attempt to increase the value of this case.
17		53.	Whether Plaintiff's alleged injuries were the result of a superseding intervening
18		001	cause.
19		54.	Whether Plaintiff suffered from any pre-existing injuries and problems at the time
20			of the incident which forms the basis of this litigation.
21		55.	Such evidentiary and procedural issues which may arise during the trial of this
22			action.
23		56.	Any remaining issues which may be brought before the Court after rulings on
24		50.	
25			Motions in Limine.
26	///		
27	///		
28	///		
FIRM at Law	ı		13

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1	IV.	EXH	IBITS	
2 3		(a)	The following exhibits are stipulated into evidence marked by the clerk:	in this case and may be so
4			NONE.	
5		(b)	As to the following exhibits, the party against wh	om the same will be offered
6		objec	ts to their admission on the grounds stated:	
7		-		
8	The fo	ollowin	g exhibits, though not agreed as admissible evidence	in this case, are subject to be
9	used b	by the p	parties. The parties will work to refine a list of exhibit	its.
10	The P	Parties	intend to offer into evidence in this case the follow	ving exhibits:
11				ing cambros.
12	No.:	Plain	tiff's Exhibits:	
10	Exhib	oit	Description	Defendants' Objections
13	1.	(Community Ambulance medical records and billing	inadmissible, lack foundation,
14		5	statement.	is/are not genuine or authentic;
15				constitute inadmissible hearsay; are unduly
				prejudicial; violative of the
16				best evidence rule, are not relevant, and are inadmissible
17				for any other reason set forth
18				within the statutory Rules of Evidence in Nevada, or any
19				other Nevada law. Defendants further object to the extent that
20				this/these documents are
21				excluded by any motion in limine.
22	2.		Interventional Pain & Spine Institute medical records	
23		č	and billing statement.	is/are not genuine or authentic; constitute inadmissible hearsay;
24				are unduly prejudicial; violative of the best evidence rule, are not
25				relevant, and are inadmissible
26				for any other reason set forth within the statutory Rules of
				Evidence in Nevada, or any
27				other Nevada law. Defendants further object to the extent that
28				this/these documents are

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		excluded by any motion in limine.
3.	Radiology Specialists FILMS, medical records and billing statement.	inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay are unduly prejudicial; violativ of the best evidence rule, are no relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in limine.
4.	Fremont Emergency Services billing statement.	inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay are unduly prejudicial; violativ of the best evidence rule, are no relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in limine.
5.	Las Vegas Radiology FILMS, medical records and billing statement.	inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay are unduly prejudicial; violativ of the best evidence rule, are no relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in limine.
6.	Machuca Medicine and Machuca Medicine Dispensary medical records and billing statement.	inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay are unduly prejudicial; violativ

		of the best evidence rule, are no relevant, and are inadmissible
		for any other reason set forth
		within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendants
		further object to the extent tha
		this/these documents are
		excluded by any motion in
7.	Sunrise Hospital medical records and billing	limine. inadmissible, lack foundation,
7.	statement.	is/are not genuine or authentic
	sutement.	constitute inadmissible hearsa
		are unduly prejudicial; violativ
		of the best evidence rule, are n
		relevant, and are inadmissible
		for any other reason set forth
		within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendants
		further object to the extent that
		this/these documents are
		excluded by any motion in
		limine.
8.	Interventional Pain & Spine Institute Surgical	inadmissible, lack foundation,
	Recommendation letter.	is/are not genuine or authentic
		constitute inadmissible hearsa
		are unduly prejudicial; violati of the best evidence rule, are n
		relevant, and are inadmissible
		for any other reason set forth
		within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendants
		further object to the extent that
		this/these documents are
		excluded by any motion in
		limine.
9.	A&M Chiropractic Wellness Center records and	inadmissible, lack foundation,
	billing statement.	is/are not genuine or authentic
		constitute inadmissible hearsa
		are unduly prejudicial; violati
		of the best evidence rule, are n
		relevant, and are inadmissible
		for any other reason set forth
		within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendants

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13.	Concentra Medical Center records and billing statements.	inadmissible, lack foundation, is/are not genuine or authentic;
	Quest Diagnostics medical and billing records.	inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay are unduly prejudicial; violativ of the best evidence rule, are no relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in limine.
11.	New Century Rehabilitation (ATI Physical Therapy) medical records and billing statement.	inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay are unduly prejudicial; violative of the best evidence rule, are no relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in limine.
10.	Spectra Clinical Labs medical records and billing statement.	further object to the extent that this/these documents are excluded by any motion in limine. inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay are unduly prejudicial; violativ of the best evidence rule, are not relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in limine.

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		constitute inadmissible hearsay are unduly prejudicial; violativ
		of the best evidence rule, are no
		relevant, and are inadmissible
		for any other reason set forth
		within the statutory Rules of Evidence in Nevada, or any
		other Nevada law. Defendants
		further object to the extent that
		this/these documents are
		excluded by any motion in
14	Cimer Med Imerica Ell MC and ited area 1	limine.
14.	SimonMed Imaging FILMS, medical records and billing statement.	inadmissible, lack foundation, is/are not genuine or authentic
	onning statement.	constitute inadmissible hearsa
		are unduly prejudicial; violativ
		of the best evidence rule, are n
		relevant, and are inadmissible
		for any other reason set forth
		within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendants
		further object to the extent that this/these documents are
		excluded by any motion in
		limine.
15.	Nevada Orthopedic and Spine Center medical	inadmissible, lack foundation,
	records and billing.	is/are not genuine or authentic
		constitute inadmissible hearsa
		are unduly prejudicial; violativ
		of the best evidence rule, are n relevant, and are inadmissible
		for any other reason set forth
		within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendants
		further object to the extent that
		this/these documents are
		excluded by any motion in
16	Jasanh Cabifini M.D. madical manufacture de 111	limine.
16.	Joseph Schifini, M.D. medical records and billing statement.	inadmissible, lack foundation, is/are not genuine or authentic
	statement.	constitute inadmissible hearsa
		are unduly prejudicial; violativ
		of the best evidence rule, are n
		relevant, and are inadmissible
		for any other reason set forth
		within the statutory Rules of

		Evidence in Nevada, or any
		other Nevada law. Defendants
		further object to the extent tha
		this/these documents are
		excluded by any motion in
17		limine.
17.	RVA Rehabilitation and Vocational Associates	inadmissible, lack foundation, is/are not genuine or authentic
	medical records and billing statement.	constitute inadmissible hearsa
		are unduly prejudicial; violati
		of the best evidence rule, are r
		relevant, and are inadmissible
		for any other reason set forth
		within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendant
		further object to the extent the
		this/these documents are
		excluded by any motion in
		limine.
18.	Steinberg Diagnostic medical records and billing	inadmissible, lack foundation
	statement.	is/are not genuine or authentic
		constitute inadmissible hearsa
		are unduly prejudicial; violati
		of the best evidence rule, are r
		relevant, and are inadmissible
		for any other reason set forth
		within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendant
		further object to the extent the
		this/these documents are
		excluded by any motion in
19.	Medical Rehabilitation Associates medical records	limine.
19.		inadmissible, lack foundation
	and billing statement.	is/are not genuine or authentic constitute inadmissible hears
		are unduly prejudicial; violati
		of the best evidence rule, are r
		relevant, and are inadmissible
		for any other reason set forth
		within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendant
		further object to the extent the
		this/these documents are
		excluded by any motion in
		limine.

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20.	Nevada Health Center medical records and billing statement.	inadmissible, lack foundation, is/are not genuine or authentic constitute inadmissible hearsay are unduly prejudicial; violativ of the best evidence rule, are not relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent tha this/these documents are excluded by any motion in limine.
21	Las Vegas Neuroscience and Pain Medicine (Mouchir Harb, M.D.) medical and billing records.	inadmissible, lack foundation, is/are not genuine or authentic constitute inadmissible hearsa are unduly prejudicial; violativ of the best evidence rule, are n relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent tha this/these documents are excluded by any motion in limine.
22.	First Person Care Clinics medical and billing records.	inadmissible, lack foundation, is/are not genuine or authentic constitute inadmissible hearsa are unduly prejudicial; violativ of the best evidence rule, are n relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent tha this/these documents are excluded by any motion in limine.
23.	Desert Radiology FILMS, medical and billing records.	inadmissible, lack foundation, is/are not genuine or authentic constitute inadmissible hearsa are unduly prejudicial; violativ of the best evidence rule, are n relevant, and are inadmissible

I	I		
1 2 3 4			for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in
5			limine.
6 7 8 9 10 11 12	24.	Henderson Hospital medical and billing records.	inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay; are unduly prejudicial; violative of the best evidence rule, are not relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are
14			excluded by any motion in
13			limine.
14 15 16 17 18 19 20 21	25.	Firooz Mashhood, M.D. medical records and billing statement.	inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay; are unduly prejudicial; violative of the best evidence rule, are not relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in
21	26		limine.
22 23	26.	Steinberg Diagnostic Medical Imaging FILMS, medical and billing records.	inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay;
23 24			are unduly prejudicial; violative of the best evidence rule, are not
25			relevant, and are inadmissible
26			for any other reason set forth within the statutory Rules of
27			Evidence in Nevada, or any other Nevada law. Defendants
28			further object to the extent that this/these documents are
	1		

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		excluded by any motion in limine.
27.	Machuca Family medical and billing records.	inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay are unduly prejudicial; violative of the best evidence rule, are not relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in limine.
28.	Kelly Hawkins Physical Therapy medical records and billing statement.	inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay are unduly prejudicial; violative of the best evidence rule, are not relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in limine.
29.	UMC medical records and billing statement.	inadmissible, lack foundation, is/are not genuine or authentic; constitute inadmissible hearsay are unduly prejudicial; violativ of the best evidence rule, are no relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that this/these documents are excluded by any motion in limine.
30.	IME Recording of Dr. Kaplan.	inadmissible, lack foundation, is/are not genuine or authentic constitute inadmissible hearsay are unduly prejudicial; violativ

		of the best evidence rule, are no relevant, and are inadmissible for any other reason set forth
		within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendants
		further object to the extent that
		this/these documents are
		excluded by any motion in limine.
31.	PMSI Pharmacy medical records and billing	inadmissible, lack foundation,
	statement.	is/are not genuine or authentic
		constitute inadmissible hearsa
		are unduly prejudicial; violativ
		of the best evidence rule, are n
		relevant, and are inadmissible for any other reason set forth
		within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendants
		further object to the extent that
		this/these documents are
		excluded by any motion in limine.
32.	Computation of Damages Chart.	inadmissible, lack foundation,
52.	Computation of Dumages Chart.	is/are not genuine or authentic
		constitute inadmissible hearsa
		are unduly prejudicial; violati
		of the best evidence rule, are n
		relevant, and are inadmissible
		for any other reason set forth within the statutory Rules of
		Evidence in Nevada, or any
		other Nevada law. Defendants
		further object to the extent that
		this/these documents are
		excluded by any motion in
		limina
33	NHP Dash Cam Footage	limine.
33.	NHP Dash Cam Footage.	inadmissible, lack foundatio
33.	NHP Dash Cam Footage.	inadmissible, lack foundatio is/are not genuine or authenti
33.	NHP Dash Cam Footage.	inadmissible, lack foundation is/are not genuine or authentic constitute inadmissible hearsa
33.	NHP Dash Cam Footage.	inadmissible, lack foundation is/are not genuine or authentic constitute inadmissible hearsa are unduly prejudicial; are n relevant, and are inadmissible
33.	NHP Dash Cam Footage.	inadmissible, lack foundation is/are not genuine or authentic constitute inadmissible hears a are unduly prejudicial; are n relevant, and are inadmissible for any other reason set for
33.	NHP Dash Cam Footage.	inadmissible, lack foundatio is/are not genuine or authenti constitute inadmissible hearsa are unduly prejudicial; are n relevant, and are inadmissib for any other reason set for within the statutory Rules
33.	NHP Dash Cam Footage.	limine. inadmissible, lack foundatio is/are not genuine or authenti constitute inadmissible hearsa are unduly prejudicial; are no relevant, and are inadmissib for any other reason set for within the statutory Rules Evidence in Nevada, Nevad case, including but not limite

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		(1985) or any other Nevada law Defendants further object to the extent that this/these document are excluded by any motion is limine.
34.	NHP Photos.	inadmissible, lack foundation, is/are not genuine or authentic constitute inadmissible hearsa are unduly prejudicial; violativ of the best evidence rule, are not relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent that
		this/these documents are excluded by any motion in limine.
35.	One (1) Colored Photograph of Plaintiff's Vehicle.	inadmissible, lack foundation, is/are not genuine or authentic constitute inadmissible hearsa are unduly prejudicial; violativ of the best evidence rule, are n relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent tha this/these documents are excluded by any motion in limine.
36.	Traffic Accident Report.	inadmissible, lack foundatio is/are not genuine or authenti constitute inadmissible hearsa are unduly prejudicial; are n relevant, and are inadmissib for any other reason set for within the statutory Rules Evidence in Nevada, Nevad case, including but not limite to <i>Frias v. Valle</i> , 101 Nev. 21 (1985) or any other Nevada law Defendants further object to th extent that this/these documen are excluded by any motion limine.

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37.	Eleven (11) Color Photos of both Plaintiff and Defendant's vehicles at the scene of the incident.	inadmissible, lack foundation, is/are not genuine or authentic constitute inadmissible hearsa are unduly prejudicial; violativ of the best evidence rule, are n relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent tha this/these documents are excluded by any motion in limine.
38.	Thirty-One (31) Color Photos taken by NHP from the scene of the incident.	inadmissible, lack foundation, is/are not genuine or authentic constitute inadmissible hearsa are unduly prejudicial; violativ of the best evidence rule, are n relevant, and are inadmissible for any other reason set forth within the statutory Rules of Evidence in Nevada, or any other Nevada law. Defendants further object to the extent tha this/these documents are excluded by any motion in
		limine.
No.: <u>De</u>	efendant's Exhibits:	limine.
No.: <u>De</u> Exhibit	efendant's Exhibits: Description	limine. Plaintiff's Objection
	Description Pinnacle Heavy Haul Bill of Lading dated	
Exhibit 1.	Description Pinnacle Heavy Haul Bill of Lading dated November 14, 2017	
Exhibit	DescriptionPinnacle Heavy Haul Bill of Lading datedNovember 14, 2017Three (3) color photographs of accident scene	
Exhibit 1. 2.	DescriptionPinnacle Heavy Haul Bill of Lading dated November 14, 2017Three (3) color photographs of accident sceneDriver's Accident ReportThirty-two (32) JPG photos from the Nevada	
Exhibit 1. 2. 3.	DescriptionPinnacle Heavy Haul Bill of Lading dated November 14, 2017Three (3) color photographs of accident sceneDriver's Accident ReportThirty-two (32) JPG photos from the Nevada Highway Patrol and edited dash cam footagePlaintiff Ruth Quimby's Community Ambulance	
Exhibit 1. 2. 3. 4.	DescriptionPinnacle Heavy Haul Bill of Lading dated November 14, 2017Three (3) color photographs of accident sceneDriver's Accident ReportThirty-two (32) JPG photos from the Nevada Highway Patrol and edited dash cam footagePlaintiff Ruth Quimby's Community Ambulance medical and billing recordsFremont Emergency Services medical and billing	
Exhibit 1. 2. 3. 4. 5.	DescriptionPinnacle Heavy Haul Bill of Lading dated November 14, 2017Three (3) color photographs of accident sceneDriver's Accident ReportThirty-two (32) JPG photos from the Nevada Highway Patrol and edited dash cam footagePlaintiff Ruth Quimby's Community Ambulance medical and billing recordsFremont Emergency Services medical and billing recordsPlaintiff Ruth Quimby's Interventional Pain and	
Exhibit 1. 2. 3. 4. 5. 6.	DescriptionPinnacle Heavy Haul Bill of Lading dated November 14, 2017Three (3) color photographs of accident sceneDriver's Accident ReportThirty-two (32) JPG photos from the Nevada Highway Patrol and edited dash cam footagePlaintiff Ruth Quimby's Community Ambulance medical and billing recordsFremont Emergency Services medical and billing records	

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1			
1	10.	Plaintiff Ruth Quimby's Radiology Specialists	
	11.	Plaintiff Ruth Quimby's Sunrise Hospital	
2	12.	Vehicle Registration for 2013 Freightliner tractor	
3	13.	Certificate of Vehicle Title for Defendant's 2013	
3		Freightliner tractor	
4	14.	Vehicle Lease Agreement related to 2013	
		Freightliner tractor/trailer	
5	15.	Michael Stevens' Employment File	inadmissible, lack foundation,
6			is/are not genuine or
6			authentic; constitute
7			inadmissible hearsay; are
			unduly prejudicial; violative
8			of the best evidence rule,
•	16.	Plaintiff Ruth Quimby's Las Vegas Surgery Center	
9	17.	Plaintiff Ruth Quimby's Steinberg Diagnostic	
10		Medical Imaging	
	18.	Plaintiff Ruth Quimby's A&M Chiropractic	
11	19.	Plaintiff Ruth Quimby's medical records, bills	
10		and/or films from Las Vegas Radiology	
12	20.	Plaintiff Ruth Quimby's medical records, bills	
13		and/or films from Steinberg Diagnostic Medical	
10		Imaging	
14	21.	Plaintiff Ruth Quimby's medical records, bills	
1.		and/or films from Quest Diagnostics	
15	22.	Plaintiff Ruth Quimby's medical records, bills	
16	22	and/or films from New Century Rehabilitation	
10	23.	Plaintiff Ruth Quimby's medical records, bills	
17	24	and/or films from Spectra Clinical Labs	
10	24.	Plaintiff Ruth Quimby's medical records, bills	
18		and/or films from Nevada Orthopedic and Spine Center + films	
19	25.	Plaintiff Ruth Quimby's medical records, bills	
	23.	and/or films from Las Vegas Neuroscience and	
20		Pain Management	
01	26.	Plaintiff Ruth Quimby's medical bills received	
21	20.	from Sunrise Hospital	
22	27.	Plaintiff Ruth Quimby's medical bills received	
	27.	from Las Vegas Neuroscience and Pain	
23		Management	
•	28.	Plaintiff Ruth Quimby's medical records received	
24		from PMSI Pharmacy	
25	29.	Plaintiff Ruth Quimby's Employment Records	
		received from the United States Postal Service	
26		[personnel file]	
	30.	Plaintiff Ruth Quimby's Employment Records	
27		received from the United States Postal Service	
28		[worker's compensation file]	
20	31.	Plaintiff Ruth Quimby's Medical and Billing	
em –			•

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	Records received from Rehabilitation & Vocational Associates	
32.	Certificate of Custodian of Records for Plaintiff's	
32.		
	Ruth Quimby's billing and medical records	
22	received from Quest Diagnostics	
33.	Plaintiff Ruth Quimby's Medical and Billing	
24	Records received from Concentra Health	
34.	Plaintiff Ruth Quimby's Films received from	
	Sunrise Hospital	
35.	Plaintiff Ruth Quimby's Films received from	
	SimonMed Imaging	
36.	Plaintiff Ruth Quimby's Medical and Billing	
	Records received from Firooz Mashhood, M.D.	
37.	Plaintiff Ruth Quimby's Medical and Billing	
	Records received from Henderson Hospital + films	
38.	Certificate of Custodian of Records of Plaintiff	
	Ruth Quimby for SimonMed Imaging	
39.	Summons and Complaint	
40.	Plaintiff Ruth Quimby's Responses to Defendant's	Inadmissible to the extent
	First Set of Interrogatories, dated October 2, 2020	superseded by supplemental
	(to the extent deemed admissible by the Court, or	answers.
	for purposes of reference without the intent to	
	admit the document)	
41.	Plaintiff Ruth Quimby's Responses to Defendant's	
	First Set of Request for Production of Documents,	
	dated October 2, 2020	
	(to the extent deemed admissible by the Court, or	
	for purposes of reference without the intent to	
	admit the document)	
42.	Plaintiff Ruth Quimby's Supplemental Responses	Inadmissible to the extent
	to Defendant's First Set of Request for Production	superseded by supplemental
	of Documents, dated October 2, 2020	responses.
	(to the extent deemed admissible by the Court, or	
	for purposes of reference without the intent to	
	admit the document)	
43.	Plaintiff Ruth Quimby's Responses to Defendant's	
101	Second Set of Interrogatories, dated May 6, 2021	
	(to the extent deemed admissible by the Court, or	
	for purposes of reference without the intent to	
	admit the document)	
44.	Plaintiff Ruth Quimby's Errata to her Responses to	
	Defendant's First Set of Interrogatories, dated May	
	6, 2021 (to the extent deemed admissible by the	
	Court, or for purposes of reference without the intent to admit the document)	
15	,	
45.	Defendant Pinnacle Heavy Haul, Inc. dba Pinnacle	
	Transport Group's Responses to Plaintiff's First	
	Set of Requests for Admissions, dated September	

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	18, 2020 (to the extent deemed admissible by the	
	Court, or for purposes of reference without the	
	intent to admit the document)	
46.	Defendant Pinnacle Heavy Haul, Inc. dba Pinnacle	
	Transport Group's Responses to Plaintiff's First	
	Set of Interrogatories, dated September 18, 2020	
	(to the extent deemed admissible by the Court, or	
	for purposes of reference without the intent to	
	admit the document)	
47.	Defendant Pinnacle Heavy Haul, Inc. dba Pinnacle	
	Transport Group's Responses to Plaintiff's First	
	Set of Request for Production of Documents, dated	
	September 18, 2020 (to the extent deemed	
	admissible by the Court, or for purposes of	
	reference without the intent to admit the document)	
48.	Curriculum Vitae of Whitney G. Morgan (to the	inadmissible, lack foundation
-	extent deemed admissible by the Court, or for	is/are not genuine or
	purposes of reference without the intent to admit	authentic; constitute
	the document)	inadmissible hearsay.
49.	Initial Expert Report of Whitney G. Morgan, dated	Constitutes inadmissible
	May 28, 2021	hearsay.
50.	Supplemental Expert Report of Whitney G.	Constitutes inadmissible
0.01	Morgan, dated August 10, 2021	hearsay.
51.	Initial Expert Report of Dror Kopernik, dated	Constitutes inadmissible
011	August 2, 2021 (to the extent deemed admissible	hearsay.
	by the Court, or for purposes of reference without	
	the intent to admit the document)	
52.	Curriculum Vitae of Dror Kopernik (to the extent	inadmissible, lack foundation
	deemed admissible by the Court, or for purposes of	is/are not genuine or
	reference without the intent to admit the document)	authentic; constitute
		inadmissible hearsay.
53.	Initial Expert Report of Dror Kopernik, dated	Constitutes inadmissible
	August 2, 2021 (to the extent deemed admissible	hearsay.
	by the Court, or for purposes of reference without	
	the intent to admit the document)	
54.	Curriculum Vitae of Stuart S. Kaplan, M.D.,	inadmissible, lack foundation
	FAANS (to the extent deemed admissible by the	is/are not genuine or
	Court, or for purposes of reference without the	authentic; constitute
	intent to admit the document)	inadmissible hearsay.
55.	Independent Medical Examination Report of Stuart	Constitutes inadmissible
55.	S. Kaplan, dated July 6, 2021(to the extent deemed	hearsay.
	admissible by the Court, or for purposes of	noubuy.
	reference without the intent to admit the document)	
56.	Supplemental Report of Stuart S. Kaplan, M.D.,	Constitutes inadmissible
50.	FAANS, dated August 2, 2021(to the extent	hearsay.
	deemed admissible by the Court, or for purposes of	nearsay.
	reference without the intent to admit the document)	
	Supplemental Report of Stuart S. Kaplan, M.D.,	Constitutes inadmissible
	Supplemental Report of Stuart S. Rapian, M.D.,	Constitutes maumissible

	FAANS, dated September 14, 2021(to the extent	hearsay.
	deemed admissible by the Court, or for purposes of	
	reference without the intent to admit the document)	
	Supplemental Report of Stuart S. Kaplan, M.D.,	Constitutes inadmissible
	FAANS, dated December 7, 2021(to the extent	hearsay.
	deemed admissible by the Court, or for purposes of	
	reference without the intent to admit the document)	
57.	Curriculum Vitae, Fee Schedule and Testimony	inadmissible, lack foundatio
	History of Saman Hazany, M.D. (to the extent	is/are not genuine or
	deemed admissible by the Court, or for purposes of	authentic; constitute
	reference without the intent to admit the document)	inadmissible hearsay.
58.	Expert Report of Saman Hazany, M.D. dated April	Constitutes inadmissible
	26, 2022(to the extent deemed admissible by the	hearsay.
	Court, or for purposes of reference without the	
	intent to admit the document)	
59.	Deposition transcript of Michael Stevens with	
	exhibits (to the extent deemed admissible by the	
	Court, or for purposes of reference without the	
	intent to admit the document)	
60.	Deposition transcript of Firooz Mashhood, M.D.	
	with exhibits (to the extent deemed admissible by	
	the Court, or for purposes of reference without the	
	intent to admit the document)	
61.	Deposition transcript of Ruth Quimby (volumes 1	
	and 2) with exhibits (to the extent deemed	
	admissible by the Court, or for purposes of	
	reference without the intent to admit the document)	
62.	Deposition transcript of Maria Giacalone, D.C.	
	with exhibits (to the extent deemed admissible by	
	the Court, or for purposes of reference without the	
	intent to admit the document)	
63.	Deposition transcript of Mouchir Harb, M.D. with	
	exhibits (to the extent deemed admissible by the	
	Court, or for purposes of reference without the	
	intent to admit the document)	
64.	Deposition transcript of Thomas L. Vater, D.O.,	
	with exhibits (to the extent deemed admissible by	
	the Court, or for purposes of reference without the	
	intent to admit the document)	
65.	Deposition transcript of Trooper Justin Branske	
	with exhibits (to the extent deemed admissible by	
	the Court, or for purposes of reference without the	
	intent to admit the document)	

and/or deposition exhibits for impeachment and/or substantively as party admissions, as may be

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relevant at trial. Defendant reserves the right to use demonstrative evidence. Defendant also reserves the right to use any exhibit listed or introduced by Plaintiff, or as previously produced by the parties.

The parties reserve any all evidentiary objections for trial. The parties reserve the right to object to the admissibility of trial exhibits on the basis of foundation, authenticity, hearsay, and relevance. The parties further reserve the right to object to any exhibit being offered by each side which has not been previously produced during the normal course of discovery proceedings, or pursuant to stipulation and agreement of the parties. The parties also reserve any and all evidentiary objections for trial.

Electronic evidence: The parties intend to offer and present evidence in electronic format
to jurors for purposes of jury deliberations pursuant to Local Rule 16-3(b)(9) and will
contact the court administrator for instructions on how to prepare evidence in electronic
format and for any other requirements set by the court.

Depositions: Defendant does not intend at this time to offer page and line designations for any deposition transcripts. In the event Defendant learns that a witness is unavailable to testify at trial, Defendant will notify all parties and the Court of page and line designations of the unavailable witness's deposition transcript to offer at trial. Defendant reserves the right to use all depositions which have been conducted in this action to refresh recollection and/or to impeach a witness, and otherwise use at trial in accordance with the applicable rules, *i.e.*, Fed. R. Civ. P. 32; Fed. R. Evid. 801(d).

The following witnesses may be called by the parties at trial:

No.: <u>Plaintiff's Witnesses:</u>

FACT & PERCIPIENT WITNESSES:

1. Ruth Quimby c/o THE702FIRM INJURY ATTORNEYS

THE702FIRM Attorneys at Law 400 S. 7th St. #400 Las Vegas, Nevada 89101 Phone: (702) 776-3333

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ATTORNEYS AT LAW 400 S. 7 th St. #400		31
ZO THE702FIRM	3.	Alberto Achaval, D.C.
28		Columbus, GA 31902
27		703 20 th Street
26		Radiology Specialists, Ltd.
		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
25		Treating Nurses and/or
24		Treating Physicians and/or
23		Joshua Owen, MD
	2.	Sunil Gujrathi, MD Richard Schwartz, MD
22		
21		2951 Marina Bay, Suite 130-132
20		Custodian of Records Fremont Emergency Services
		Fed. R. Civ. P. 30(b)(6) Representative and/or
19		Treating Nurses and/or
18	1.	Treating Physicians and/or
17	1.	Arron V. Lovinger, MD
		ENTATIVES AND/OR DESIGNEES
16	PLAINTI	FF'S MEDICAL PROVIDERS – Fed. R. Civ. P. 30(B)(6)
15		Las Vegas, NV 89118
14		4615 W. Sunset Road
		Nevada Highway Patrol
13	4.	Officer Branske Badge No. H6701
12		
11		(702) 316-4111
		Las Vegas, NV 89128
10		c/o HALL JAFFE & CLAYTON, LLP 7425 Peak Drive
9		Pinnacle Transportation Systems, Inc.
8		Pinnacle Transport Group
Ø		Fed. R. Civ. P. 30(b)(6) for Pinnacle Heavy Haul, Inc., dba
7	3.	30(b)(6) Person(s) Most Knowledgeable and/or
6		
5		Las Vegas, NV 89128 (702) 316-4111
E		7425 Peak Drive
4		c/o HALL JAFFE & CLAYTON, LLP
3	2.	Michael Stevens
		(702) 776-3333
2		Las Vegas, Nevada 89101
1		400 South 7th Street, 4 th Floor

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1		Treating Physicians and/or
2		Treating Nurses and/or
2		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
3		A&M Chiropractic Health Wellness Center
4		830 E. Charleston Blvd.
		Las Vegas, NV 89104
5	4	Degalia Maghuan MD
6	4.	Rogelio Machuca, MD Treating Physicians and/or
7		Treating Nurses and/or
7		Fed. R. Civ. P. 30(b)(6) Representative and/or
8		Custodian of Records
9		Machuca Family Medicine 1501 S. Eastern Avenue
		Las Vegas, NV 89104
10		
11	5.	Thomas Morgan, EMT
12		Robert Norton, Paramedic Jon Flynn AEMT
12		Treating Physicians and/or
13		Treating Nurses and/or
14		Fed. R. Civ. P. 30(b)(6) Representative and/or
		Custodian of Records Community Ambulance
15		PO Box 98821
16		Las Vegas, NV 89193
17	6.	Rogelio Machuca, MD
	0.	Treating Physicians and/or
18		Treating Nurses and/or
19		Fed. R. Civ. P. 30(b)(6) Representative and/or
20		Custodian of Records Machuca Family Dispensary
		1501 S. Eastern Avenue
21		Las Vegas, NV 89104
22	7.	Bhuvana P. Kittusamy, MD
23	/.	Treating Physicians and/or
		Treating Nurses and/or
24		Fed. R. Civ. P. 30(b)(6) Representative and/or
25		Custodian of Records Las Vegas Radiology
		401 N. Buffalo Drive, Suite 100
26		Las Vegas, NV 89145
27	0	Acron Lovingon MD
28	8.	Aaron Lovinger, MD Peggy L. Beller, MD
		Treating Physicians and/or
THE702FIRM ATTORNEYS AT LAW		32
400 S. 7 th St. #400 LAS VEGAS, NEVADA 89101 PHONE: (702) 776-3333		
PHONE: (702) 776-3333		

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1	1	
1		Treating Nurses and/or
2		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
3		Sunrise Hospital & Medical Center
		3186 S. Maryland Parkway Las Vegas, NV 89109
4		
5	9.	Jorg Rosler, MD Treating Physicians and/or
6		Treating Nurses and/or
7		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
8		Interventional Pain & Spine Institute
9		851 S. Rampart Blvd., Suite 100 Las Vegas, NV 89145
		Las Vegas, IVV 07145
10	10.	Melanie Gough, PT, and/or, Barbar Rosso, PT, and/or,
11		Doug Frasniewski, PT and/or,
12		Kasi Snook, PT and/or, Treating Physicians and/or
13		Treating Nurses and/or
14		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
15		New Century Rehabilitation
		(ATI Physical Therapy) 7201 Pack Dr. Sta. 150
16		7301 Peak Dr, Ste. 150 Las Vegas, NV 89128
17	11.	Ead D. Civ. D. 20(b)(6) Depresentative and/or
18	11.	Fed. R. Civ. P. 30(b)(6) Representative and/or Treating Physicians and/or
19		Treating Nurses and/or Custodian of Records
20		PMSI Pharmacy
21		P.O. Box 850001, Dept. 0570
		Orlando, FL 32885
22	12.	Firooz Mashhood, M.D. and/or Treating Physicians and/or
23		Treating Nurses and/or
24		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
25		Medical Rehabilitation Associates
26		734 E. Sahara Ave. Las Vegas, NV 89104
27		
28	13.	Fed. R. Civ. P. 30(b)(6) for Professional Institute of Technology Inc
		Treating Physicians and/or
THE702FIRM Attorneys at Law 400 S. 7 th St. #400 Las Vegas, Nevada 89101 Phone: (702) 776-3333		33

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1	1	
1		Treating Nurses and/or
		Representative and/or
2		Custodian of Records
3		2625 S. Rainbow Blvd Las Vegas, NV 89104
4		
5	14.	Kenneth Fortgang, M.D. and/or Matthew Reardon, M.D and/or
5		Greg J. Coleman, PT and/or
6		Michael P. Foster, PT and/or
7		Jason Rusk, M.D. and/or
8		Steven Xiao, M.D. and/or Raymund Dela, M.D. and/or
o		John Britton, PT, and/or
9		Robert Lewis, PT and/or
10		Treating Physicians and/or Treating Nurses and/or
11		Fed. R. Civ. P. 30(b)(6) Representative and/or
11		Custodian of Records
12		Concentra Medical Center 149 N. Gibson Road
13		Henderson, NV 89014
14	1.5	
	15.	David Mirich, M.D. and/or Henry Chang, M.D. and/or
15		Treating Physicians and/or
16		Treating Nurses and/or
17		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
		Steinberg Diagnostic Medical Imaging
18		P.O. Box 36900
19		Las Vegas, NV 89133
20	16.	Eric Davis, M.S., CRC, and/or
21		Treating Physicians and/or
		Treating Nurses and/or Fed. R. Civ. P. 30(b)(6) Representative and/or
22		Custodian of Records
23		RVA-Rehabilitation & Vocational Associates
24		6550 S. Pecos Rd. Ste B-114 Las Vegas, NV 89120
25	17.	George Greaney, MD Treating Physicians and/or
26		Treating Physicians and/or Treating Nurses and/or
27		Fed. R. Civ. P. 30(b)(6) Representative and/or
		Custodian of Records
28		Las Vegas Surgery Center 870 S. Rancho
2FIRM S AT LAW	1	34
St. #400		-

1	1	
1		Las Vegas, NV 89106
2	18.	Joseph J. Schifini, MD
3		Treating Physicians and/or
5		Treating Nurses and/or
4		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
5		600 S. Tonopah Dr., Suite 240
		Las Vegas, NV 89106
6	10	Muhammad Ali Hudan MD and/an
7	19.	Muhammad Ali Hyder, M.D. and/or Treating Physicians and/or
8		Treating Nurses and/or
		Fed. R. Civ. P. 30(b)(6) Representative and/or
9		Custodian of Records First Person Care Clinics
10		1200 S. 4 th Street, Suite 111
11		Las Vegas, NV 89104
	20	Ead D. Civ. D. 20(h)(6) Domagontative and/or
12	20.	Fed. R. Civ. P. 30(b)(6) Representative and/or Treating Physicians and/or
13		Treating Nurses and/or
14		Custodian of Records for
		QTC Medical Group 1818 N. Orange Grove, Suite 101
15		Pomona, CA 91767
16		
17	21.	Thomas Vater, DO, and/or
17		Treating Physicians and/or Treating Nurses and/or
18		Fed. R. Civ. P. 30(b)(6) Representative and/or
19		Custodian of Records
20		Nevada Orthopedic & Spine Center 7455 W. Washington Ave. Ste. 160
20		Las Vegas, NV 89128
21		
22	22.	Fed. R. Civ. P. 30(b)(6) Representative and/or
22		Treating Physicians and/or Treating Nurses and/or
23		Custodian of Records
24		Oasis Counseling Neuropsychology/LCSW
25		7361 Prairie Falcon Rd. Ste. D Las Vegas, NV 89128
26		
26	23.	Elizabeth Iole, M.D. and/or
27		Treating Physicians and/or Treating Nurses and/or
28		Fed. R. Civ. P. 30(b)(6) Representative and/or
THE702FIRM		Custodian of Records
400 S. 7 th St. #400		35

1	T	
1		Quest Diagnostics
2		4230 Burnham Ave. #144
		Las Vegas, NV 89119
3	24.	Fed. R. Civ. P. 30(b)(6) Representative and/or
4		Treating Physicians and/or Treating Nurses and/or
5		Custodian of Records UNLV Medicine
6		1707 W. Charleston Blvd. Suite 110
7		Las Vegas, NV 891002
8	25.	Mouchir S. Harb M.D. and/or
9		Treating Physicians and/or Treating Nurses and/or
10		Fed. R. Civ. P. 30(b)(6) Representative and/or
		Custodian of Records Las Vegas Neuroscience and Pain Institute
11		6276 S. Rainbow Blvd. Ste. 100
12		Las Vegas, NV 89118
13	26.	David K. Lieu, M.D and/or
14		Youssef Korkar, CLS and/or, Jesse A. Abrajano, M.S., CLS and/or
15		Treating Physicians and/or
16		Treating Nurses and/or Fed. R. Civ. P. 30(b)(6) Representative and/or
17		Custodian of Records
		Spectra Clinical Labs 8337 Telegraph Rd. #4
18		Pico Rivera, CA 90660
19	27.	Robert R. Cartwright, M.D. and/or
20		William Orrison, Jr. M.D. and/or
21		Treating Physicians and/or Treating Nurses and/or
22		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
23		SimonMed Imaging
		P.O. Box 207465 Dallas, TX 75320-7466
24		Danas, 1X 75520-7400
25	28.	Parisa Amleshi, M.D. and/or Treating Physicians and/or
26		Treating Nurses and/or
27		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
28		Nevada Health Centers, Inc.
FIRM		3325 Research Way
ат Law t. #400		36

	11	
1		Carson City, NV 89706
2	29.	Stepanida Freeman, M.D. and/or
3		Treating Physicians and/or Treating Nurses and/or
4		Fed. R. Civ. P. 30(b)(6) Representative and/or
5		Custodian of Records
		Henderson Hospital 1050 W. Galleria Dr.
6	20	Henderson, NV 89011
7	30.	Marko Marbella, M.D. and/or Van Nguyen, M.D. and/or
8		Tamra Baldauf, M.D. and/or
9		Hubert Chin, M.D. and/or Treating Physicians and/or
10		Treating Nurses and/or
		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
11		Desert Radiology
12		2020 Palomino Lane, Ste 100 Las Vegas, NV 89106
13		
14	31.	Soterita Aispuro, M.D. and/or Treating Physicians and/or
15		Treating Nurses and/or
16		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
		University Medical Center
17		1800 W. Charleston Blvd Las Vegas, NV 89102
18		Las Vegas, 11 V 69102
19	32.	Fed. R. Civ. P. 30(b)(6) Representative and/or Treating Physicians and/or
20		Treating Nurses and/or
21		Custodian of Records
		Kelly Hawkins & Associates 3831 W. Charleston Blvd
22		Las Vegas, NV 89102
23	33.	Treating Physicians and/or
24		Treating Nurses and/or
25		Fed. R. Civ. P. 30(b)(6) Representative and/or Custodian of Records
26		Firooz Mashhood, M.D.
2 0 27		5440 W Sahara Ave, Ste 104 Las Vegas, NV 89146
28		
FIRM		

Case 2:19-cv-02181-JCM-NJK Document 56 Filed 05/23/22 Page 38 of 43

1	No.:	<u>Defe</u>	ndant's Witnesses:
2		1.	Pinnacle Transport Group
3			A) FRCP 30(b)(6) Witness(es) to be determined
			B) Mark Herman, Director of Safety & Compliance 2206 Toledo Road
4			Elkhart, Indiana 46516
5		2.	Michael L. Stevens
6			880 Salem Drive
7			Toms River, New Jersey 08753
8		_	
9		3.	Ruth Quimby c/o Michael C. Kane, Esq.
			Bradley J. Myers, Esq.
10			Richard A. Englemann, Esq. THE702FIRM
11			400 South Seventh Street, Suite 400
12			Las Vegas, Nevada 89101
13		4.	Nevada Highway Patrol
14			A) FRCP 30(b)(6)Witness(es) and/or Custodian of RecordsB) Trooper Branske, P# H6701
15			4615 West Sunset Road
			Las Vegas, Nevada 89118
16		5.	Physicians, Nurses, Technicians, Healthcare Providers and/or
17			FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Jeff Nicholls John Flynn
18			Community Ambulance
19			91 Corporate Park Drive, Suite 120 Henderson, Nevada 89074
20			Tenderson, Nevada 89074
21		6.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Laiken Dupes
			Fremont Emergency Services Mandavia, Ltd.
22			3429 Regal Drive Alcoa, Tennessee 37701
23			Arcoa, Tennessee 57701
24		7.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Amanda Davis
25			Jorg Rosler, M.D.
26			Interventional Pain and Spine Institute 851 South Rampart Boulevard, Suite 100
27			Las Vegas, Nevada 89145
28		8.	Physicians, Nurses, Technicians, Healthcare Providers and/or
20 THE702FIRM		0.	FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Mario Gonzalez
ATTORNEYS AT LAW 400 S. 7 th St. #400			38

Case 2:19-cv-02181-JCM-NJK Document 56 Filed 05/23/22 Page 39 of 43

1	Í	
1		Bhuvana Kittusamy, M.D.
2		Las Vegas Radiology
		401 North Buffalo Drive, Suite 100 Las Vegas, Nevada 89145
3		
4	9.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Martha Felix
5		Rogelio Machuca, M.D.
6		Maria Machuca, APRN
		Machuca Family Medicine 1501 South Eastern Avenue
7		Las Vegas, Nevada 89104
8	10.	Physicians, Nurses, Technicians, Healthcare Providers and/or
9	10.	FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Andrea Araneta
10		Radiology Specialists, Ltd. 703 20 th Street
11		Columbus, Georgia 31902
	11.	Physicians, Nurses, Technicians, Healthcare Providers and/or
12	11.	FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Frances Oliveri
13		Aaron Lovinger, M.D.
14		Joshua Owen, M.D. Richard Schwartz, M.D
15		Sunrise Hospital
		3186 South Maryland Parkway
16		Las Vegas, Nevada 89109
17	12.	Physicians, Nurses, Technicians, Healthcare Providers and/or
18		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Laurie Gove Joseph Schifini, M.D
19		Las Vegas Surgery Center
		870 South Rancho Drive Las Vegas, Nevada 89106
20		Las vegas, nevaua 69100
21	13.	Physicians, Nurses, Technicians, Healthcare Providers and/or
22		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Ana Santamaria David Mirich, M.D
23		Henry Chang, M.D.
24		Steinberg Diagnostic Medical Imaging 2950 South Maryland Parkway
		Las Vegas, Nevada 89109
25	14	Dharisiana Maaraa Tashaisiana Hashkharaa Daaridaan aadka
26	14.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Maria Santamaria
27		Alberto Achaval, D.C.
28		Maria Giacalone, D.C. A&M Chiropractic
		228 South Jones Boulevard
THE702FIRM Attorneys at Law 400 S. 7 th St. #400		39

Case 2:19-cv-02181-JCM-NJK Document 56 Filed 05/23/22 Page 40 of 43

I	1	
1		Las Vegas, Nevada 89107
2	15.	Physicians, Nurses, Technicians, Healthcare Providers and/or
3		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Clarence Kerr Quest Diagnostics
4		4230 Burnham Avenue Las Vegas, Nevada 89119
5		
6	16.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Anna Vardaman
7		Doug Krasniewski, PT Melanie Gough, PT
8		Kasi Snook, PT Barbara Rosso, PTA
9		New Century Rehabilitation, an ATI Company 1505 Wigwam Parkway, Suite 240
10		Henderson, Nevada 89074
11	17.	Physicians, Nurses, Technicians, Healthcare Providers and/or
12		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, "Erin" Spectra Clinical Labs
13		20655 South Western Avenue, Suite 105 Torrance, California 90501
14		Torrando, Camorina 90501
15	18.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Janine Schwartz
16		Thomas Vater, D.O. Vladimir Sinkov, M.D.
17		Nevada Orthopedic & Spine Center
18		7455 West Washington Avenue, Suite 160 Las Vegas, Nevada 89128
19	19.	Physicians, Nurses, Technicians, Healthcare Providers and/or
20		FRCP 30(b)(6)Witness(es) and/or Custodian of Records Mouchir Harb, M.D.
21		Las Vegas Neuroscience and Pain Medicine 6276 South Rainbow Boulevard, Suite 100
22		Las Vegas, Nevada 89118
23	20.	Physicians, Nurses, Technicians, Healthcare Providers and/or
24		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Jasmin Alicea PMSI Pharmacy
25		4502 East Woodland Corp Boulevard, Suite 105 Tampa, Florida 33614
26		1 /
27	21.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Jasmin Alicea
28		United States Postal Service Law Department - Western Area
THE702FIRM ATTORNEYS AT LAW 400 S. 7 th St. #400 VECAS NEWADA 80101		40

	1	
1		1745 Stout Street, Suite 500 Denver, Colorado 80299-5555
2		Deriver, Colorado 60277-5555
3	22.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Gerald Davis
4		Gerald Y. Davis, M. Ed., CRC
5		Eric Davis, M.S., CRC Rehabilitation & Vocational Associates
5		6550 South Pecos Road, Suite B-114
6		Las Vegas, Nevada 89120
7	23.	Physicians, Nurses, Technicians, Healthcare Providers and/or
8		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Roxie Franklin Matthew Reardon, M.D.
9		Tony Chin, M.D.
10		Jason Rusk, PA-C
		Raymund Dela, PA-C John Britton, PT
11		Greg Coleman, PT
12		Michael P. Foster, PT
13		Concentra Medical Center 5850 South Polaris Avenue, Suite 100
		Las Vegas, Nevada 89118
14	24	Dhysisians Numers Technicians Healthears Providers and/or
15	24.	Physicians, Nurses, Technicians, Healthcare Providers and/or FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Kevin Segoviano
16		Firooz Mashhood, M.D.
17		5440 West Sahara Avenue, Suite 104 Las Vegas, Nevada 89146
		Las Vegas, Nevaua 69140
18	25.	Physicians, Nurses, Technicians, Healthcare Providers and/or
19		FRCP 30(b)(6)Witness(es) and/or Custodian of Records, Lisa Redden Stepanida Freeman, M.D.
20		Sean Stevens, M.D.
21		Henderson Hospital 1050 Galleria Drive
		Henderson, Nevada 89011
22	26	
23	26.	Dror Kopernik, P.E. Foresight Reconstruction, Inc.
24		5901 Lincoln Avenue
25		Morton Grove, Illinois 60053
26	27.	Whitney G. Morgan
		Motor Carrier Safety Consulting
27		2229 First Avenue North Birmingham, Alabama 35203
28	20	
THE702FIRM	28.	Stuart S. Kaplan, M.D.
400 S. 7 th St. #400		41

1	
1	Las Vegas Neurosurgical Institute 3012 South Durango Drive
2	Las Vegas, Nevada 89117
3 4	29. Saman Hazany, M.D.2800 Neilson Way, Suite 1704
5	Santa Monica, California 90405
6	The parties agree that the witness and exhibit list may be amended as required before trial.
7	The parties reserve the right to use any witnesses listed by any other party to this litigation.
8	The parties further reserve the right to name and list any witnesses deemed necessary for rebuttal
9	and/or impeachment purposes.
10	VIII. TRIAL DATE
11	Counsel have met and herewith submit a list of (3) agreed-upon trial dates:
12 13	May 8, 2023
13	May 15, 2023
15	May 23, 2023
16	It is expressly understood by the undersigned that the Court will set a trial of this matter on
17	one of the agreed-upon dates if possible; if not, the trial will be set at the convenience of the
18	Court's calendar.
19	ESTIMATED LENGTH OF TRIAL
20	It is estimated that the trial will take a total of 7-10 days.
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THE702FIRM ATTORNEYS AT LAW	42

1	THE702FIRM INJURY ATTORNEYS	HALL JAFFE & CLAYTON, LLP.
2	/s/ Zachary W. Livingston 5/17/2022	/s/ Daniel C. Tetreault 5/17/2022
3	MICHAEL C. KANE. ESQ.	STEVEN T. JAFFE, ESQ.
4	Nevada Bar No.: 10096	Nevada Bar No.: 7035
_	BRADLEY J. MYERS, ESQ.	DANIEL C. TETREAULT, ESQ.
5	Nevada Bar No.: 8857	Nevada Bar No.: 11473
6	ZACHARY W. LIVINGSTON, ESQ.	7425 Peak Drive
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8	Telephone: (702) 776-3333	<i>E-Mail:</i> sjaffe@lawhjc.com
ð	Facsimile: (702) 505-9787	E-Mail: <u>dtetreault@lawhjc.com</u>
9	<i>E-Mail: service@the702firm.com</i>	Attorneys for Defendants
10	Attorneys for Plaintiff	
11		
12		
13	ACT	ION BY THE COURT
14	This case is set for court/jury	y trial on the fixed/stacked calendar on May 8, 202
15	at 9:00 a.m.	
16	The Calendar call will be held on May	3, 2023 at 1:30 p.m
17	This pretrial order has been approved b	by the parties to this action as evidenced by their
18 19	signatures or the signatures of their attorneys h	ereon, and the order is hereby entered and will
20	govern the trial of this case. This order may no	t be amended except by court order and based upor
21	the parties' agreement or to prevent manifest in	njustice.
22	DATED: <u>May 23, 2022</u> .	
23		Xerry C. Mahan
24	Ū	INITED STATES DISTRICT JUDGE
25		
26		
27		
28		
THE702FIRM TORNEYS AT LAW 00 S. 7 th St. #400		43