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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY

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NICOLE THOMPSON,)
 Plaintiff,)
 vs.)
 TRW AUTOMOTIVE U.S. LLC, et al.,)
 Defendants.)

CASE NO. 2:09-cv-1375-JAD-PAL
**TRIAL STIPULATION REGARDING
 MEDICAL EXPENSES**

The parties have reached certain agreements concerning medical expenses and propose the following jury instruction be given during Plaintiff's case-in-chief:

1. The parties have agreed to certain facts to be placed in evidence as Exhibit 25. You should therefore treat these facts as having been proved.

a. Exhibit 25 is a list of all of Plaintiff's medical bills, which excludes Plaintiff's medical bills from Lemper Pain Centers (collectively Plaintiff's Exh. 214), Dr. Brian Lemper (Plaintiff's Exh. 214a), the Center for Surgical Intervention (Plaintiff's Exh. 214b), and Summerlin Outpatient Pharmacy (Plaintiff's Exh. 214c).

b. The parties agree that the dollar amounts listed in Exhibit 25 accurately summarize Plaintiff's medical bills for treatments provided to Plaintiff.

c. The parties agree that the dollar amounts listed in Exhibit 25 are usual and customary charges in the Las Vegas area for treatments provided to Plaintiff.

2. However, in considering Exhibit 25:

a. You must still decide whether the treatments provided to Plaintiff were reasonable.

b. You must still decide whether the treatments provided to Plaintiff were necessary.

c. You must still decide whether the non-deployment of the air bag caused, as cause is defined by the judge, any of Plaintiff's alleged injuries or necessitated any of the treatments provided to Plaintiff.

1 d. You must still decide whether Plaintiff's motor vehicle accident caused, as cause
2 is defined by the judge, all of Plaintiff's alleged injuries or necessitated all of the treatments
3 provided to Plaintiff.

4 In addition to reading this instruction to the jury, the Parties agree that Exhibit 25 will
5 include identical language (paragraphs 1, 1 a. through 1 c., 2, and 2 a. through 2.d) at the
6 beginning of the document or as a cover page to the document.

7 DATED this 14th day of August, 2014.

8 By: /s/ Clay Robbins, III

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10 Nevada Bar No. 2281

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IT IS SO ORDERED this 14th day of August, 2014.


U.S. DISTRICT COURT JUDGE