

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

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4 NICOLE THOMPSON, )  
5 Plaintiff, )  
6 vs. )  
7 TRW AUTOMOTIVE U.S. LLC, et al., )  
8 Defendants. )

CASE NO. 2:09-cv-1375-JAD-PAL

**AMENDED TRIAL STIPULATION  
REGARDING PLAINTIFF'S  
PREGNANCY AND DELIVERY**

9 The parties have reached certain agreements concerning medical expenses related to  
10 Plaintiff's pregnancy and C-Section delivery and propose the following instruction be given to  
11 the jury:

12 **1. The parties have agreed that certain facts be placed in evidence as Exhibit**  
13 **215. You should therefore treat the fact below as having been proved.**

14 a. As a result of Plaintiff's carotid artery dissection and the stent placement, she  
15 required the treatment described in Exhibit 215a, 215b and 215c.

16 **2. Exhibit 215 includes medical records related to Plaintiff's pregnancy and C-**  
17 **Section delivery.**

18 a. The total cost of the treatment described in Exhibit 215 was \$11,606.00 (\$420  
19 from Essential Women's Health [215a], \$3,186 from High Risk Pregnancy [215b] and \$8,000  
20 from St. Rose Hospital [215c]). The charges for the treatment described in Exhibit 215 are  
21 already included in Exhibit 25, which is a list of Plaintiff's medical bills.

22 **3. However, in considering Exhibit 215:**

23 a. You must still decide whether the non-deployment of the air bag legally caused,  
24 as legal cause is defined by the Judge, Plaintiff's carotid artery dissections and any of the  
25 treatment provided to Plaintiff as a result of the dissections, including without limitation  
26 Plaintiff's pregnancy-related and C-section delivery related costs.

1 In addition to reading this instruction to the jury, the Parties agree that Exhibit 215 will  
2 be admitted and will include identical language (paragraphs 1 through 3) at the beginning of the  
3 Exhibit 215.

4 DATED this 25th day of August, 2014.

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IT IS SO ORDERED this 26<sup>th</sup> day of August, 2014.

  
U.S. DISTRICT COURT JUDGE