

1 Michael J. O'Connor – Admitted *Pro Hac Vice*
2 moconnor@jsslw.com

3 **JENNINGS, STROUSS & SALMON, P.L.C.**

4 A Professional Limited Liability Company
5 201 East Washington Street – 11th Floor
6 Phoenix, AZ 85004-2358
7 Telephone: (602) 262-5889
8 Facsimile: (602) 495-2645

9 Robert A. Goldstein (NV Bar #5001)

10 rgoldstein@jsslw.com

11 **JENNINGS, STROUSS & SALMON, P.L.C.**

12 A Professional Limited Liability Company
13 8330 West Sahara Avenue, Suite 290
14 Las Vegas, NV 89117-8949
15 Telephone: (702) 227-0700
16 Facsimile: (702) 227-0799

17 Attorneys for Defendant Synthes USA
18 Sales, LLC, identified as Synthes, (USA)
19 in the caption

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 ARLENE BALLARD,

23 Plaintiff,

24 vs.

25 SYNTHES, (USA),

26 Defendant.

Case No. 2:09-cv-01448-PMP-GWF

**STIPULATION AND ORDER FOR
DISMISSAL WITH PREJUDICE AS
TO DEFENDANT SYNTHES USA
SALES, LLC¹**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Defendant Synthes USA Sales, LLC, by and through their counsel of record, that all of Plaintiff's claims against Defendant Synthes USA Sales, LLC are hereby dismissed with prejudice, in exchange for Synthes USA Sales, LLC's waiver of its right to collect costs and fees from Plaintiff in the above-captioned matter.

¹ Identified as Synthes, (USA) in the caption.

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

DATED this 21st day of December, 2010.

JENNINGS, STROUSS & SALMON, P.L.C.

By: /s/ Michael J. O'Connor

Michael J. O'Connor
One East Washington Street, Suite 1900
Phoenix, AZ 85004-2554

Robert A. Goldstein
8330 West Sahara Avenue, Suite 290
Las Vegas, NV 89117-8949

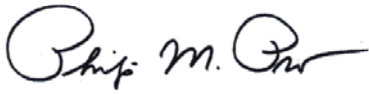
Attorneys for Defendant

LAW OFFICES OF MICHAEL F. BOHN, ESQ., LTD.

By: /s/ Michael F. Bohn

Michael F. Bohn
1880 East Warm Springs Road, Suite 110
Las Vegas, NV 89119
Attorneys for Plaintiff

IT IS SO ORDERED THIS _ 20th day of December, 2010.



UNITED STATES DISTRICT 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

CERTIFICATE OF MAILING

I hereby certify that on December 21, 2010, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Michael F. Bohn - mbohn@bohnmorris.com

I hereby certify that on December 21, 2010, I served the attached document by mail on the following, who are not registered participants of the CM/ECF System:

By _____ /s/ K. C. Rusboldt