

1 **SEDGWICK LLP**  
 2 Maria Louise Cousineau  
 3 (Nevada Bar No.: 002876)  
 4 *maria.cousineau@sedgwicklaw.com*  
 5 Joshua S. Davis  
 6 (*Pro Hac Vice*)  
 7 *joshua.davis@sedgwicklaw.com*  
 8 801 South Figueroa Street, 19th Floor  
 9 Los Angeles, CA 90017-5556  
 10 Telephone: 213.426.6900  
 11 Facsimile: 213.426.6921

7 **KOLESAR & LEATHAM**  
 8 Alan J. Lefebvre  
 9 (Nevada Bar No. 000848)  
 10 *alefebvre@klnevada.com*  
 11 William D. Schuller  
 12 (Nevada Bar No. 011271)  
 13 *weschuller@klnevada.com*  
 14 400 South Rampart Boulevard, Suite 400  
 15 Las Vegas, NV 89145  
 16 Telephone: (702) 362-7800  
 17 Facsimile: (702) 362-9472

13 Attorneys for Defendant CENTURY SURETY COMPANY

14  
 15 UNITED STATES DISTRICT COURT  
 16 DISTRICT OF NEVADA  
 17

18 DANA ANDREW, as Legal Guardian of  
 19 RYAN T. PRETNER, and RYAN PRETNER,  
 20 individually,

20 Plaintiff,

21 v.

22 CENTURY SURETY COMPANY, a foreign  
 23 corporation; and DOES 1-10, inclusive,

24 Defendant.  
 25

Case No. 2:12-cv-00978-APG-PAL  
 Hon. Andrew P. Gordon  
 (Magistrate Judge Hon. Peggy A. Leen)

**JOINT STATUS REPORT RE  
 DISCOVERY DISPUTE**

26 Pursuant to Judge Leen’s April 30, 2013 Order, Plaintiffs Dana Andrew, as Legal  
 27 Guardian of Ryan T. Pretner, and Ryan Pretner, individually, (Plaintiffs) and Defendant Century  
 28

1 Surety Company submit the following Joint Status Report regarding the pending discovery  
2 dispute:

3  
4 On May 14, 2013, Century Surety served (by mail and electronically) its Further  
5 Amended Response to Request for Production of Documents, a copy of which is attached as  
6 Exhibit 1 to this Joint Status Report. The following documents were produced with the Further  
7 Response:

8 Exhibit 1: *Century Surety's Guide to Claim Best Practices,*

9 Exhibit 2: *Meadowbrook Insurance Group's Claim Department Operating*  
10 *Guidelines.*

11 Exhibit 3: The reinsurance agreements applicable to the underlying claim

12 Exhibit 4: Those portions of Ms. Henderson's personnel file which relate to her  
13 training, experience, and evaluations that touch upon her claims handling capabilities from the  
14 period of 2008 forward.

15 Exhibit 5: Those portions of Mr. Holland's personnel file which relate to his training,  
16 experience, and evaluations that touch upon his claims handling capabilities from the period of  
17 2008 forward.

18 Century Surety had no communications with any Reinsurer regarding the underlying  
19 claim prior to the date this lawsuit was filed and therefore produced no documents in response to  
20 Request No 10 (as modified by the Court.)

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 Century Surety believes there are no remaining issues relating to Plaintiffs motion to  
2 Compel and therefore requests the Court vacate the scheduled further hearing date of May 21,  
3 2013.

4 DATED: May 16, 2013

5 **SEDGWICK LLP**

6  
7 By: /s/Maria Louise Cousineau  
8 Maria Louise Cousineau  
9 Nevada Bar No. 2876  
801 S. Figueroa Street, 19th Floor  
Los Angeles, CA 90017-5556

10 - and -

11 **KOLESAR & LEATHAM**  
12 Alan J. Lefebvre  
(Nevada Bar No. 0848)  
13 William D. Schuller  
(Nevada Bar No. 011271)  
14 400 South Rampart Boulevard, Suite 400  
Las Vegas, NV 89145

15 Attorneys for Defendant  
16 CENTURY SURETY COMPANY


17  
18 DATED: May 16, 2013

**PRINCE & KEATON**

19  
20 By: /s/Dennis M. Prince  
21 Dennis M. Prince  
(Nevada Bar No. 5092)  
22 3230 South Buffalo Drive, Suite 108  
Las Vegas, Nevada 89117

23 **IT IS ORDERED** that the hearing scheduled for May 21, 2013, at 9:30 a.m. is  
24 VACATED, as the parties have advised the court that a hearing is no longer required.

25 Dated this 20th day of May, 2013.

26   
27 Peggy A. Leen  
28 United States Magistrate Judge