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Counsel for Defendants Kristine Lee Jacobs, an individual,

8
 9 UNITED STATES DISTRICT COURT
 10 DISTRICT OF NEVADA

11 JOHN HANCOCK LIFE)
 12 INSURANCE COMPANY (U.S.A.),)
 13 a Michigan Corporation,)
 14 Plaintiff,)
 15 vs.)
 16 KRISTINE LEE JACOBS, an)
 17 individual; KRISTINE LEE JACOBS,)
 18 as guardian of B.W., a minor; GINA)
 19 NEFF, an individual; DUANE)
 20 JACOBSEN, an individual; Does I to)
 X, and roe Corporations X to XX,)
 Defendants.)

Case No. 2:13-cv-00557-APG-GWF

**STIPULATION AND ORDER
 TO RELEASE INTREPLEADED FUNDS
 AND DISMISS ACTION WITH
 PREJUDICE**

21
 22 IT IS HEREBY STIPULATED AND AGREED by and between the parties Kristine Lee
 23 Jacobs f/k/a Kristine Lee Wood ("Kristine"), and Edward Kainen as the appointed guardian ad
 24 litem (the "GAL") for Brandon Charles Wood ("B.W.") together with Kristine, the "Parties"), that
 25 the funds interpleaded in this matter be disbursed to a blocked account for the benefit of B. W., a
 26 minor, and that the above-captioned interpleader action be dismissed with prejudice.
 27
 28

Greenberg Traurig, LLP
 3773 Howard Hughes Parkway, Suite 400 North
 Las Vegas, Nevada 89169
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1 WHEREAS, Plaintiff John Hancock Life Insurance (U.S.A.) (“John Hancock”) brought
2 this action to determine the entitlement to insurance proceeds relating to a life insurance policy
3 issued to Albert L. Wood Jr. (“the Proceeds”).

4 WHEREAS, John Hancock deposited the Proceeds with the Court pursuant to this Court’s
5 Order (Doc. No. 24) and John Hancock was subsequently dismissed from this matter pursuant to
6 the Court’s Order granting Plaintiff’s Renewed Motion for Discharge (Doc. No. 37);

7 WHEREAS, Defendant Duane Jacobson, is deceased and is not a party to this action
8 pursuant to the Notice of Passing of Defendant Duane Jacobsen (Doc. No. 36);

9 WHEREAS, the clerk has entered default as to Defendant Gina Neff (Doc. No. 27);

10 WHEREAS, Kristine and B.W. are the only remaining parties to this action;

11 WHEREAS, B.W. is a minor and this court appointed Edward Kainen to serve as a
12 guardian ad litem (“GAL”) for the minor child in this action (Doc. No. 44);

13 WHEREAS, an Order was entered by this Court on January 8, 2015 allowing for a
14 blocked account to be established for the benefit of Brandon Charles Wood with the intent that
15 the interpleaded funds would be disbursed to the same. (Doc. No. 47);

16 WHEREAS, Kristine filed proof of a blocked account with this Court on January 30,
17 2015. (Doc. No. 48);

18 NOW THEREFORE, the Parties stipulate and agree that as soon as practicable, the
19 Proceeds, less the GAL’s reasonable attorneys’ fees and costs totaling \$1,970.00 (the “Net
20 Proceeds”) as set forth in the billing statement attached hereto as **Exhibit 1**, shall be disbursed
21 into the blocked account established for the benefit of Brandon Charles Wood pursuant to Doc.
22 No. 47 and Doc. No. 48.

23 Attached hereto as **Exhibit 2** are documents from Bank of American containing the
24 account number and ACH Routing Number to facilitate the transfers of interplead funds from the
25 Court into the blocked account.¹

26 FURTHER, the Parties stipulate and agree that this matter be dismissed with prejudice.
27


28 ¹ The banking documents are being filed concurrent with a motion to seal the same as there is no public interest
and/or right to the account information contained therein.


1 FURTHER, the parties further agree that Edward Kainen's appointment as B.W.'s GAL
2 shall terminate immediately upon entry of the Order dismissing this action.

3 IT IS HEREBY STIPULATED.

4 GREENBERG TRAUIG, LLP

KAINEN LAW GROUP, PLLC

5  Date: 2/2/15
6 Kara B. Hendricks, Esq. (NV Bar 7743)
7 Colin Seale, Esq. (NV Bar 13017)
8 3773 Howard Hughes Parkway
9 Suite 400 North
10 Las Vegas, Nevada 89169
11 *Counsel for Defendant Kristine*
12 *Lee Jacobs*

 Date: 1/30/15
Edward L. Kainen, Esq. (NV Bar 5029)
3303 Novat Street, Suite 200
Las Vegas, Nevada 89129
Counsel and Guardian Ad Litem for the
Minor Child B.W.

13 **ORDER**

14 **IT IS SO ORDERED** this 2nd day of February, 2015.

15 
16 UNITED STATES DISTRICT COURT JUDGE

17 Respectfully submitted by:

18 GREENBERG TRAUIG, LLP


19 
20 Kara B. Hendricks, Esq. (NV Bar 7743)
21 Colin Seale, Esq. (NV Bar 13017)
22 3773 Howard Hughes Parkway
23 Suite 400 North
24 Las Vegas, Nevada 89169
Counsel for Defendant Kristine
Lee Jacobs

EXHIBIT 1

KAINEN

LAW GROUP
A Professional Limited Liability Company

3303 Novat Street
Las Vegas, NV 89129

T: (702) 823-4900 F: (702) 823-4488

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Brandon Woods
NV

October 30, 2014

File#: 369-001

Inv #: 5185

RE: Woods, Brandon - GAL

DATE	DESCRIPTION
Aug-01-14	Review file and documents from case in anticipation of telephone conference with lawyers for Kristine Jacobs; Telephone conference with lawyers for Kristine Jacobs regarding outline of issues, discussion, issues ripe for consideration;
Aug-11-14	Prepare Notice of Appearance
Aug-12-14	Conference with Kristine Jacobs (mother of client) and Brandon Woods only
Aug-15-14	Prepare letter to adverse attorney inviting meeting to discuss case; Exchange email with adverse attorney regarding setting settlement discussions
Aug-26-14	Outline issues for upcoming meeting with adverse attorney; Exchange email with opposing counsel regarding upcoming meeting, inability of opposing counsel to attend, and request to conduct teleconference; Telephone conference with adverse attorney regarding discussion of possible avenues for resolution of case without litigation
Aug-28-14	Prepare draft of letter to Kara Hendricks regarding results of meeting and discussions with minor child's mother
Oct-27-14	Read and study email from adverse attorney regarding their clients desire to withdrawal request and drop litigation;

Summary of Time

	Hours	Rate	Total Amt
Edward Kainen	3.70	\$500.00	\$1,850.00
Carol L. Navarro	0.60	\$200.00	\$120.00
Total Hours:	4.30	Total Fees:	\$1,970.00

Total Fees & Disbursements

\$1,970.00

Balance Now Due

\$1,970.00

Trust Balance \$0.00

PAYMENT IS DUE 15 DAYS FROM THE DATE OF THIS INVOICE
Late payments are subject to interest and finance charges

***** A credit card payment form is included for your convenience *****

EXHIBIT 2

EXHIBIT 2 FILED UNDER SEAL