

1 DANIEL G. BOGDEN  
United States Attorney  
2 District of Nevada

3 BLAINE T. WELSH  
Nevada Bar No. 4790  
4 KRYSTAL J. (GALLAGHER) ROSSE  
Nevada Bar No. 11573  
5 Assistant United States Attorneys  
333 Las Vegas Boulevard South, Suite 5000  
6 Las Vegas, Nevada 89101  
Telephone: 702-388-6336  
7 Facsimile: 702-388-6787  
Email: *krystal.rosse@usdoj.gov*

8 Attorneys for the United States.  
9

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 THE ESTATE OF BARRY ISOM, by and )  
through its Executrix, Mary Love-Isom; Jaime )  
13 Isom Newberry and Kimberly Isom Grindstaff; )  
14 Plaintiffs, )  
15 v. )  
16 UNITED STATES OF AMERICA, )  
17 Defendant. )

Case No. 2:14-cv-00475-RFB-VCF

18  
19 **STIPULATION AND ORDER FOR TRAVEL COSTS**

20 The parties, by and through their respective counsel of record, hereby stipulate and agree that  
21 Plaintiffs' counsel reimburse the United States for travel costs related to taking Plaintiff Kimberlee Isom  
22 Grindstaff's deposition in Sacramento, California, on June 3, 2015.

23 Generally, a plaintiff must be deposed in the place where suit is filed. In this case, rather than file  
24 a discovery motion attempting to enforce this general rule, the parties met, conferred and agreed that  
25 counsel for the United States would travel to Plaintiff's location for the deposition and Plaintiff would  
26 pay Federal Defendant's related travel costs.

1 Under Government financial rules, to effectuate this agreement and allow Plaintiffs to reimburse  
2 the United States, the parties' agreement must be reduced to a court order.

3 WHEREFORE, the parties respectfully request that the Court order Plaintiffs' counsel to  
4 reimburse Federal Defendant for \$577.11 in travel costs for its travel to and from Sacramento,  
5 California, to conduct Plaintiff Kimberlee Isom Grindstaff's deposition on June 3, 2015. The parties  
6 further agree that neither party will claim these costs as additional compensation or reimbursable costs  
7 to be taxed by the Court.

8 Respectfully submitted this 8th day of June 2015.

9 CRAIG A. MARQUIZ  
10 Marquiz Law Office, PC

11 JUSTICE LAW CENTER

12 /s/ Alissa C. Engler

13 BRET O. WHIPPLE, ESQ.  
14 ALISSA C. ENGLER, ESQ.

15 Attorneys for Plaintiffs

DANIEL G. BOGDEN  
United States Attorney

16 /s/ Krystal J. Rosse

17 BLAINE T. WELSH  
18 KRYSTAL J. (GALLAGHER) ROSSE  
19 Assistant United States Attorneys

20 Attorneys for the United States

21 **IT IS SO ORDERED:**

22   
23 **UNITED STATES MAGISTRATE JUDGE**

24 **DATED:**

25 June 10, 2015  
26