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JORGE A. RAMIREZ, ESQ.
Nevada Bar No. 6787
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Attorneys for Defendant Jennifer Hogan

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THOMAS DUBE, as Parent and Legal Guardian of
JORDAN DUBE, a minor,

Plaintiff,

vs.

JENNIFER HOGAN; WESTERN UNITED
INSURANCE COMPANY dba AAA NEVADA
INSURANCE COMPANY; and DOES 1 through
10 , and ROE ENTITIES 11 through 20, inclusive

Defendants.

Case No.: 2:14-CV-00495- JCM-VCF
**STIPULATION AND ORDER TO
REMAND**

IT IS HEREBY STIPULATED by and between Richard A. Harris, Esq. and Samantha A. Martin, Esq. of the RICHARD HARRIS LAW FIRM, attorneys for Plaintiff, THOMAS DUBE, as Parent and Legal Guardian of JORDAN DUBE (hereinafter "Plaintiff"), and Jorge Ramirez, Esq. and Ellen Bowman, Esq. of WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP, attorneys for Defendant JENNIFER HOGAN (hereinafter "Defendant"), that as the total value of damages in this action does not exceed this Court's required amount of SEVENTY-FIVE THOUSAND DOLLARS and NO CENTS (\$75,000.00) necessary to maintain subject matter jurisdiction in this court, this case shall be REMANDED to the Eighth Judicial District Court of Clark County, Nevada for all further proceedings.

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IT IS FURTHER STIPULATED between the parties that the total amount of damages which Plaintiff seeks to recover in this action will not exceed SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00).

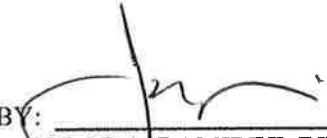
IT IS FURTHER STIPULATED that Plaintiff WAIVES any right to collectively recover any monies above and beyond SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00) in this action against Defendant, resulting from the incident that occurred on August 1, 2012.

DATED this 10th day of December, 2014.

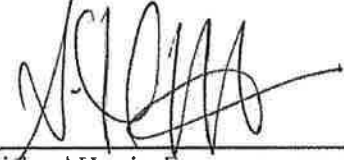
DATED this 30th day of December, 2014.

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**

RICHARD HARRIS LAW FIRM

BY: 

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Attorneys for Defendant Jennifer Hogan

BY: 

Richard Harris, Esq.
Nevada Bar No. 505
Samantha Martin
Nevada Bar No. 12998
801 South Fourth Street
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Attorneys for Plaintiff Thomas Dube, as
parent and legal guardian of Jordan Dube

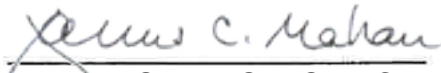
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ORDER

IT IS HEREBY ORDERED that, as the value of this case does not exceed the jurisdictional limits of this Court, this case is REMANDED to the Eighth Judicial District Court of Clark County, Nevada for all future proceedings, pursuant to the terms stipulated by the parties set forth herein.

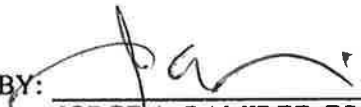
IT IS FURTHER HEREBY ORDERED that pursuant to the agreement of the parties, the maximum amount of damages which Plaintiff may recover in this matter is limited to SEVENTY-FIVE THOUSAND DOLLARS and NO CENTS (\$75,000.00).

DATED December 12, 2014.


UNITED STATES DISTRICT JUDGE

Prepared and Respectfully Submitted by:

**WILSON, ELSER, MOSKOWITZ, EDELMAN
& DICKER LLP**

BY: 

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