

1 MEGAN K. DORSEY, ESQ.
 Nevada Bar No. 6959
 2 ANDREW C. GREEN, ESQ.
 Nevada Bar No. 9399
 3 DAVID M. GOULD, ESQ.
 Nevada Bar No. 11143
 4 KOELLER NEBEKER CARLSON & HALUCK, LLP
 300 South Fourth Street, Suite 500
 5 Las Vegas, NV 89101
 Phone: (702) 853-5500
 6 Fax: (702) 853-5599
 Attorneys for Defendant,
 7 LIBERTY MUTUAL FIRE INSURANCE COMPANY

8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

10 SHARRON ELISE SALINAS, individually)) CASE NO.: 2:14-cv-01494-GMN-PAL
11 Plaintiff,)	
12 vs.)	STIPULATION AND ORDER TO REMAND TO THE EIGHTH JUDICIAL DISTRICT COURT OF NEVADA
13 LIBERTY MUTUAL FIRE INSURANCE)	
COMPANY, a Massachusetts company;)	
14 DOES I - X, inclusive; and/or ROÉ)	
15 CORPORATIONS I - X, inclusive,)	
16 Defendants.)	

17 **IT IS HEREBY STIPULATED BY AND BETWEEN**, Defendant, LIBERTY
 18 MUTUAL FIRE INSURANCE COMPANY, [hereinafter referred to as "Defendant"], by and
 19 through its counsel of record, the law firm of KOELLER, NEBEKER, CARLSON &
 20 HALUCK, LLP, and Plaintiff, SHARRON ELISE SALINAS [hereinafter referred to as
 21 "Plaintiff"], by through her counsel of record, Justin G. Randall, Esq., of the law firm of
 22 GLEN LERNER INJURY ATTORNEYS, that:

1. For any and all litigation regarding the claims at issue in this case, Plaintiff,
 24 SHARRON ELISE SALINAS, will not seek and cannot receive damages in excess
 25 of \$50,000.00, if any, inclusive of all prejudgment interest, costs, and fees,
 26 including but not limited to, attorneys' fees.

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
27
28

2. Based on the limitation of Plaintiff's alleged damages and Plaintiff's counsel's representations, the parties agree to remand this case to the Eighth Judicial District Court, as the case in controversy amount is not met.

3. The parties agree to, and waive any and all claims to attorneys' fees and costs solely related to the Removal and/or Remand of this case.

DATED this 20th day of October, 2014.

DATED this 20th day of October, 2014.

KOELLER NEBEKER CARLSON
& HALUCK, LLP

GLEN LERNER INJURY ATTORNEYS

By: David M. Gould
DAVID M. GOULD, ESQ.
Nevada Bar No. 11143
300 South Fourth Street, Suite 500
Las Vegas, NV 89101
Attorneys for Defendant,
LIBERTY MUTUAL FIRE
INSURANCE COMPANY

By: Justin G. Randall
JUSTIN G. RANDALL, ESQ.
Nevada Bar No. 12476
4765 S. Durango Drive
Las Vegas, NV 89147
Attorneys for Plaintiff

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
27
28

ORDER

IT IS HEREBY ORDERED that for any and all litigation regarding the claims at issue in this case, Plaintiff, SHARRON ELISE SALINAS, will not, may not and shall not seek, and cannot receive, damages in excess of \$50,000.00, if any, inclusive of any and all prejudgment interest, costs, and fees, including but not limited to, attorneys' fees.

IT IS HEREBY FURTHER ORDERED that, based on the limitation of Plaintiff's alleged damages and Plaintiff's counsel's representations, this matter is remanded to the Eighth Judicial District Court, as the case in controversy amount is not met.

IT IS HEREBY FURTHER ORDERED that the parties waive any and all claims to attorneys' fees and costs solely related to the Removal and/or Remand of this case.

DATED this 20th day of October, 2014.



Gloria M. Navarro, Chief Judge
United States District Court

Respectfully Submitted By:

KOELLER, NEBEKER, CARLSON
& HALUCK, LLP

By: David M. Gould
DAVID M .GOULD, ESQ.
Nevada Bar No. 11143
300 South Fourth Street, Suite 500
Las Vegas, NV 89101
Attorneys for Defendant,
LIBERTY MUTUAL FIRE
INSURANCE COMPANY