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7
8 **UNITED STATES DISTRICT COURT**
9
10 **DISTRICT COURT OF NEVADA**

11 ANDREA VALDEZ, individually,)
12 ANDREA VALDEZ, as Legal Guardian)
13 Of MAILI JUAREZ-VALDEZ, a minor)
14 Plaintiff,)
15 vs.)
16 STATE FARM MUTUAL AUTOMOBILE)
INSURANCE COMPANY, DOES I-X, and)
17 ROE CORPORATIONS I-X, inclusive,)
18 Defendant.)

CASE NO.: 2:14-cv-01638-RFB-VCF

19 **STIPULATION TO DISMISS THE CLAIMS OF ANDREA VALDEZ,**
20 **INDIVIDUALLY, WITH PREJUDICE and TO DISMISS THE EXTRA**
21 **CONTRACTUAL CLAIMS OF ANDREA VALDEZ AS LEGAL GUARDIAN OF MAILI**
22 **JUAREZ-VALDEZ**

23 The named parties, ANDREA VALDEZ, individually, and ANDREA
24 VALDEZ, as Legal Guardian of MAILI JUAREZ-VALDEZ, a minor and
STATE FARM MUTUAL INSURANCE COMPANY, by and through their
respective attorneys, A.J. SHARP, ESQ. of RICHARD HARRIS LAW
FIRM and GEORGE M. RANALLI, ESQ. and JOHN WILLIAM KIRK, ESQ. of

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1 RANALLI & ZANIEL, LLC. HEREBY STIPULATE AND AGREE to Dismiss
2 Plaintiff, ANDREA VALDEZ's individual claims in their entirety
3 with prejudice each of the parties to pay their own attorney
4 fees and costs incurred herein.

5 IT IS FURTHER STIPULATED AND AGREED that the claims of
6 ANDREA VALDEZ as Legal Guardian of MAILI JUAREZ-VALDEZ, a minor
7 as contained in Plaintiff complaint on file herein and
8 identified as: (1) Plaintiff's Second Cause of Action for breach
9 of the covenant of good faith and fair dealing [Bad Faith]; (2)
10 Plaintiff's Third Cause of Action for unjust enrichment; and (3)
11 Plaintiff's Fourth Cause of Action for violation of Nevada's
12 Fair Claims Practices Act- NRS 686A.310 and any claims for
13 Punitive Damages are dismissed with prejudice.

14 IT IS STIPULATED that the only remaining action to be tried
15 in this matter is the claim of ANDREA VALEZ as Legal Guardian of
16 MAILI JUAREZ-VALDEZ for Breach of Contract.

17 ~~February 8th~~, 2015
June
18 RANALLI & ZANIEL, LLC
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February 11th, 2015
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ORDER

Pursuant to the above Stipulation of the Parties **IT IS HEREBY ORDERED** that the individual claims of Plaintiff, ANDREA VALDEZ, be dismissed with prejudice in their entirety. The Parties are to pay their own attorney fees and costs.

IT IS FURTHER ORDERED that the claims of ANDREA VALEZ, as Legal Guardian of MAILI JUAREZ-VALDEZ, a minor, for: breach of the covenant of good faith and fair dealing (Bad Faith); unjust enrichment; violation of Nevada Fair Claims Practices Act (NRS 686A.310); and claims for punitive damages are dismissed with prejudice.

IT IS ORDERED that the only claim remaining for adjudication by this court is the claim of ANDREA VALDEZ, as Legal Guardian for MAILI JUAREZ-VALDEZ, a minor for breach of contract.

DATED this 16th day of June, 2015.



RICHARD F. BOULWARE, II
United States District Judge