

RANALLI & ZANIEL, LLC  
2400 WEST HORIZON RIDGE PARKWAY  
HENDERSON, NEVADA 89052  
TELEPHONE: (702) 477-7774 FAX: (702) 477-7778

1 **GEORGE M. RANALLI, ESQ.**  
Nevada Bar No. 5748  
2 **JOHN WILLIAM KIRK, ESQ.**  
Nevada Bar No. 4654  
3 **RANALLI & ZANIEL, LLC**  
2400 W. Horizon Ridge Parkway  
4 Henderson, Nevada 89052  
Telephone: (702) 477-7774  
5 Facsimile: (702) 477-7778  
Attorney for Defendant,  
6 STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT COURT OF NEVADA**

9 ANDREA VALDEZ, individually, )  
10 ANDREA VALDEZ, as Legal Guardian )  
Of MAILI JUAREZ-VALDEZ, a minor )  
11 )  
Plaintiff, ) CASE NO.: 2:14-cv-01638-RFB-VCF  
12 )  
13 vs. )  
14 STATE FARM MUTUAL AUTOMOBILE )  
INSURANCE COMPANY, DOES I-X, and )  
15 ROE CORPORATIONS I-X, inclusive, )  
16 Defendant. )  
\_\_\_\_\_ )

17 **STIPULATION AND ORDER TO REMAND THE CLAIM OF ANDREA VALDEZ, AS**  
18 **LEGAL GUARDIAN OF MAILI JUAREZ-VALDEZ, A MINOR TO STATE COURT**

19 **BASED UPON THE PARTIES PREVIOUS STIPULATION** dismissing the  
20 claims of **ANDREA VALDEZ**, individually, and the claims of **ANDREA**  
21 **VALDEZ** as Legal Guardian of **MAILI JUAREZ-VALDEZ**, a minor, as  
22 contained in Plaintiff's Complaint on file herein and identified  
23 as: (1) Plaintiff's second cause of action for breach of the  
24 covenant of good faith and fair dealing [Bad Faith];

1 (2) Plaintiff's third cause of action for unjust enrichment; and  
2 (3) Plaintiff's fourth cause of action for violation of Nevada's  
3 Fair Claims Practices Act-NRS 686A.310; and, (4) any claims for  
4 punitive damages with prejudice;[Document No.20]

5 **THE PARTIES HEREBY FURTHER STIPULATE AND AGREE** that  
6 Plaintiff, **ANDREA VALDEZ's** remaining claim as Legal Guardian of  
7 **MAILI JUAREZ-VALDEZ** for breach of contract has a value of less  
8 than **FIFTY THOUSAND DOLLARS (\$50,000.00.)**

9 **THE PARTIES FURTHER STIPULATE AND AGREE** that because the  
10 amount in controversy currently does not exceed \$75,000.00 that  
11 diversity jurisdiction is not present.

12 Therefore, **THE PARTIES STIPULATE AND AGREE** that this case  
13 be remanded to the Clark County District Court, Case No.: A-14-  
14 7066517-C in order to allow the Plaintiff to pursue her claim on  
15 behalf of the minor **MAILI JUAREZ-VALDEZ** in Nevada State Court.

16 June __, 2015	June __, 2015
17 <b>RANALLI &amp; ZANIEL, LLC</b>	<b>RICHARD HARRIS LAW FIRM</b>
18 <i>/s/:John W. Kirk, Esq.</i>	<i>/s/: A.J. Sharp, Esq.</i>
19 <b>GEORGE M. RANALLI, ESQ.</b>	<b>A.J. SHARP, ESQ.</b>
Nevada Bar No. 5748	Nevada Bar No. 11457
<b>JOHN WILLIAM KIRK, ESQ.</b>	801 South Fourth Street
Nevada Bar No. 4654	Las Vegas, Nevada 89101
2400 W. Horizon Ridge Parkway	Attorneys for Plaintiffs
Henderson, Nevada 89052	
Attorney for Defendant	

ORDER

Pursuant to the above Stipulation of the Parties;

**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.

Pursuant to Stipulation of the Parties it is agreed the remaining claim has a value of less than **FIFTY THOUSAND DOLLARS (\$50,000.00)** ;

**THEREFORE IT IS ORDERED, ADJUDGED AND DECREED** that the above noted matter is remanded to the EIGHTH JUDICIAL DISTRICT COURT, CLARK COUNTY, NEVADA, under case number A-14-7066517-C to allow pursuit of the breach of contract claim.

DATED this 13th day of July , 2015.



RICHARD F. BOULWARE, II  
United States District Judge