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10 Attorneys for Plaintiff

11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

15 NIKTA JANATI,)
)
 16 Plaintiff,)
)
 17 v.)
)
 18 UNIVERSITY OF NEVADA)
 LAS VEGAS SCHOOL OF DENTAL)
 19 MEDICINE, R. MICHAEL SANDERS,)
 STANLEY NELSON, CHRISTOPHER)
 20 KYPUROS, KAREN WEST,)
 BRANDON BIEHLER, ELENI COLLIS,)
 21 and DOES 1-20,)
)
 22 Defendants.)
 23 _____)

Case No: 2:15-cv-1367-APG-CWH

**STIPULATION FOR PLAINTIFF TO
 ABANDON GENERAL DAMAGES
 CLAIMS**

ORDER

24 It is hereby stipulated by and between the Parties, by and through their respective counsel,
 25 as follows:

- 27 1. Plaintiff is abandoning all claims found in her First Amended Complaint (ECF. No. 29) for
 28 general damages, including, but not limited to, any and all medical and emotional distress

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claims;

2. Paragraphs 73, 78, and Plaintiff’s second prayer for relief in the First Amended Complaint (ECF. No. 29) shall be stricken in their entirety;
3. Plaintiff’s reference to being “upset” in Paragraph 21 of her First Amended Complaint (ECF. No. 29) shall be stricken;
4. Plaintiff and her counsel agree not to mention, refer to, or attempt to convey to the jury in any manner, either directly or indirectly, that Plaintiff has suffered any hurt, upset, emotional distress or medical symptoms/treatment in connection with the allegations found in the First Amended Complaint (ECF. No. 29);
5. Plaintiff stipulates and agrees that the jury will be instructed that it may not award general damages or damages of any kind for any pain, suffering, hurt, embarrassment, or emotional distress and that Plaintiff’s damages are limited to non-medical compensatory and economic damage, only;
6. Nothing in this stipulation will preclude the Defendants from taking discovery on her prior allegations of medical/emotional distress as Plaintiff’s prior allegations may relate to the Defendant’s defenses at trial nor waive or preclude the right of Plaintiff to object to such; and
7. The Parties agree to address the admissibility at trial of any evidence gathered on these medical/emotional issues during discovery through motions in limine.

Dated this 13th day of September, 2016.

Respectfully submitted by:

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE
Dated: September 13, 2016.

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Attorneys for Defendants

12 Attorneys for Plaintiff

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15 **ORDER**

16 IT IS SO ORDERED.

17
18 United States District Court Judge
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21 Submitted by:

22
23 /s/ Allen Lichtenstein
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