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22 *Attorneys for Defendant*  
23 *Union Pacific Railroad Company*

24 **UNITED STATES DISTRICT COURT**  
25 **DISTRICT OF NEVADA**

26 GREG GIBBONS,  
27  
28 Plaintiff,  
29  
30 vs.  
31  
32 UNION PACIFIC RAILROAD COMPANY,  
33  
34 Defendant.

Case 2:15-cv-02231-GMN-CWH  
**STIPULATION AND [PROPOSED]  
ORDER FOR DISMISSAL WITH  
PREJUDICE**

35 Plaintiff Greg Gibbons and Defendant Union Pacific Railroad Company stipulate and  
36 agree to dismiss this action in its entirety with prejudice, with each party to bear its own  
37 attorney's fees and costs. The parties therefore respectfully request that the Court enter  
38

1 an Order dismissing this action with prejudice with each party to bear its own attorney's  
2 fees and costs.

3 Dated this 15th day of April, 2020.

4 McDONALD CARANO LLP

MORRIS LAW FIRM

6 By: /s/ Pat Lundvall

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*Attorneys for Plaintiff  
Greg Gibbons*

20 *Attorneys for Defendant  
Union Pacific Railroad Company*

22 **IT IS SO ORDERED.**

23 Dated this 16 day of April, 2020

24  
25  
26   
27 \_\_\_\_\_  
28 Gloria M. Navarro, District Judge  
United States District Court

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**CERTIFICATE OF SERVICE**

I certify that I am an employee of McDonald Carano, and that on the 15th day of April, 2020, a true and correct copy of the foregoing STIPULATION AND [PROPOSED] ORDER FOR DISMISSAL WITH PREJUDICE was electronically filed with the Clerk of the Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification.

/s/ Beau Nelson  
An employee of McDonald Carano LLP

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