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7
 8 **UNITED STATES DISTRICT COURT**
 9 **FOR THE DISTRICT OF NEVADA**

10 ANTHONY SADANA AND
 11 ARA LIQUIDATIONS LLC.,

12 Plaintiff,

13 v.

14 TALL TREES LOGISTICS INC. AND 669779
 15 ONTARIO LTD. DBA CSA
 TRANSPORTATION INC.

16 Defendants,

CASE NO. 2:16-cv-01203-RFB-PAL

**STIPULATION AND ORDER TO
 REMAND ACTION PURSUANT TO 28
 U.S.C. §1447**

17 IT IS HEREBY STIPULATED by and among, Plaintiff ARA Liquidations, LLC (“ARA”),
 18 by and through its attorney of record, Mincin Law, PLLC, Defendant Tall Trees Logistics Inc. (“Tall
 19 Trees”), by and through its attorney of record, Wilson Elser Moskowitz Edelman & Dicker LLP, and
 20 Defendant 669779 Ontario Ltd. dba CSA Transportation Inc. (“CSA”), by and through its attorneys
 21 of record, Stephenson & Dickinson, P.C. that the total value of damages in this action does not
 22 exceed this Court’s requisite amount of SEVENTY-FIVE THOUSAND DOLLARS and NO
 23 CENTS (\$75,000.00) necessary to maintain subject matter jurisdiction in this Court, thus the case
 24 shall be REMANDED to the Eighth Judicial District Court of Clark County, Nevada for all further
 25 proceedings.

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1 IT IS FURTHER STIPULATED that Plaintiff WAIVES any right to collectively recover any
2 monies above and beyond SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00) in this action
3 against Defendants, resulting from the incident that gives rise to this litigation.
4

5 **APPROVED AS TO FORM AND CONTENT**

6 WILSON ELSER MOSKOWITZ EDELMAN &
7 DICKER LLP

8 /s/David S. Kahn

9 David S. Kahn, Esq.
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11 Carl R. Houston, Esq.
12 Nevada Bar No. 11161
13 300 South Fourth Street, 11th Floor
14 Las Vegas, NV 89101
15 *Attorneys for Defendant Tall Trees Logistics Inc.*

16 Dated: October 20, 2016.

17 STEPHENSON & DICKINSON, P.C.

18 /s/Jacquelyn M. Franco

19 Bruce S. Dickinson, Esq.
20 Nevada Bar No. 002297
21 Michael Hottman, Esq.
22 Nevada Bar No. 008501
23 Jacquelyn M. Franco, Esq.
24 Nevada Bar No. 13484
25 2820 West Charleston Boulevard, Suite B-19
26 Las Vegas, NV 89102
27 *Attorneys for 669779 Ontario Ltd. d/b/a CSA*
28 *Transportation, Inc.*

Dated: October 20, 2016.

MINCIN LAW, PLLC



/s/David Mincin

David Mincin, Esq.
Nevada Bar No. 5427
528 S. Casino Center, #325
Las Vegas, NV 89101
Attorney for Plaintiff ARA Liquidations, LLC

Dated: October 20, 2016.

ORDER

DATED this 7th day of November, 2016



RICHARD F. BOULWARE, II
United States District Judge

Prepared and Respectfully Submitted by:

**WILSON, ELSER, MOSKOWITZ, EDELMAN
& DICKER LLP**

BY: 

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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP, and that on this 12th day of November, 2016, I served a true and correct copy of the foregoing **DEFENDANT TALL TREES LOGISTICS, INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT ONTARIO LTD. DBA TRANSPORTATION, INC.** as follows:

- by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;
- via hand-delivery to the addressees listed below;
- via facsimile;
- by transmitting via email the document listed above to the email address set forth below on this date:

David Mincin, Esq.
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Attorneys for 669779 Ontario, Ltd.

BY: 
An Employee of
WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP

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