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*Attorneys for Defendant State Farm Fire and  
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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

LUZ ELENA CUADROS, on behalf of herself )  
 and all others similarly situated, )  
 Plaintiff, )  
 vs. )  
 STATE FARM FIRE AND CASUALTY )  
 COMPANY, )  
 Defendant, )

Case No. 2:16-CV-02025 JCM (VCF)

**STIPULATION AND ORDER  
 REGARDING SAMPLING  
 PROTOCOL AND ALLOCATION OF  
 COSTS**

**STIPULATION**

Plaintiff Luz Elena Cuadros ("Plaintiff") and Defendant State Farm Fire and Casualty Company ("State Farm") (together, the "Parties"), by and through their respective counsel, hereby submit this Stipulation in response to the Court's September 11, 2017 Order that the parties file a stipulation regarding a sampling protocol and allocation of costs (ECF No. 80).

1 On September 6, 2017, this Court held a hearing on State Farm's Motion for a Protective  
2 Order (ECF No. 56) and Plaintiff's Motion to Compel (ECF No. 65). One issue in dispute was  
3 Plaintiff's request that State Farm produce a sample subset of Nevada total loss claim files  
4 associated with the putative class that Plaintiff seeks to represent in this case. After the hearing,  
5 the Court directed the parties to meet and confer and to file a stipulation and order regarding a  
6 sampling protocol and allocation of costs (ECF No. 80.)

7 The parties have met and conferred and hereby stipulate and agree as follows:

8 1) State Farm shall produce on a rolling basis the valuation-related portions of the first  
9 20 Nevada total loss claim files from each year of the putative class period (2011 - 2016). State  
10 Farm agrees to pay the costs associated with producing (e.g., collecting, printing, reviewing,  
11 redacting) these documents.

12 2) The parties reserve all rights with respect to State Farm's production of the  
13 valuation-related portions of any additional claim files and any allocation of costs associated with  
14 such a production. For example, Plaintiff reserves the right to request that State Farm produce the  
15 valuation-related portions of up to 100 claim files for each year of the putative class period. State  
16 Farm reserves the right to oppose any such request and/or to request that Plaintiff pay some or all  
17 of the costs associated with any such production.

18 Dated this 27th day of September, 2017.

Dated this 27th day of September, 2017.

19 /s/ Michael J. Gayan

/s/ Riley A. Clayton

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IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE  
9-28-2017

Dated: \_\_\_\_\_