

1 **JOINTLY SUBMITTED**

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UNITED STATES DISTRICT COURT

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DISTRICT OF NEVADA

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CHRISTINA JARAMILLO,

Case No.: 2:16-cv-02538-RFB-CWH

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Plaintiff,

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vs.

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BODEGA LATINA CORPORATION
dba EL SUPER; A Foreign Corporation;
12 DOES I - 20, ROE BUSINESS ENTITIES
1 through 20, inclusive jointly and
13 severally,

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Defendants.

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STIPULATION AND ORDER TO DISMISS SECOND CAUSE OF ACTION ONLY

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Plaintiff Christina Jaramillo and Defendant Bodega Latina Corporation, dba El

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Super, by and through their respective counsel, herby stipulate and agree to the

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following:

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1. On November 3, 2015, Christina Jaramillo was a patron at the Bodega
21 Latina Corporation's El Super store at 2021 E. Lake Mead Blvd., North
22 Las Vegas, NV 89080.

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2. On that day Christina Jaramillo slipped and fell on a wet substance on the
24 floor of that store.

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3. Defendant Bodega Latina Corporation is liable to Plaintiff as alleged in the
26 Second Cause of Action for negligent hiring, training, supervision,
27 retaining, and firing of its employees on the premises and in ensuring its
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STIPULATION AND ORDER TO DISMISS SECOND CAUSE OF ACTION ONLY

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employees likewise exercise due care and maintain the premises in a reasonably safe and non-dangerous condition.

4. In exchange for the above stipulation of liability Plaintiff further agrees to the following:

a. To voluntarily dismiss her Second Cause of Action Only against Defendant Bodega Latina Corporation.

Dated: September 14, 2017

Dated: September 14, 2017

RICHARD HARRIS LAW FIRM

BAUMAN LOEWE WITT & MAXWELL, PLLC

/s/ Michaela E. Tramel

/s/ Michael C. Mills

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ORDER

Upon Stipulation by counsel for the parties, and good cause appearing therefore, IT IS HEREBY ORDERED that the Stipulation [ECF 31] hereinabove is hereby Granted.

DATED this 18th day of September, 2017.



RICHARD F. BOULWARE, II
United States District Judge