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7 **UNITED STATES DISTRICT COURT**  
 8 **DISTRICT OF NEVADA**

9 JOSE HERNANDEZ-GUTIERREZ, an  
 individual, and SANDRA RAMIREZ, an  
 10 individual,

Case No.: 2:17-cv-00697-RFB-PAL

11 Plaintiffs,

12 vs.

13 ELI BROWN, an individual, and AMERICAN  
 TECHNOLOGIES NETWORKS, INC., a  
 14 foreign Corporation, and HERTZ VEHICLES,  
 LLC., a foreign Corporation, and DOES I  
 15 through XX, inclusive and ROE BUSINESS  
 ENTITIES I through XX, inclusive,

**STIPULATION AND ORDER  
 REGARDING THE TOTAL VALUE OF  
 DAMAGES**

16 Defendants.

17 **IT IS HERBY STIPULATED AND AGREED**, by Plaintiffs and Defendants, by and  
 18 through their undersigned counsel of record, that regardless of the total value of damages argued  
 19 for or awarded to the Plaintiffs, the general damages in this action will not exceed the amount of  
 20 seventy-five thousand dollars and zero cents (\$75,000) per Plaintiff, excluding attorney fees,  
 21 statutory costs, pre-judgment and post-judgment interest, if any.

22 **IT IS FURTHER STIPULATED AND AGREED**, that Plaintiffs, through their counsel  
 23 of record, retain the right to argue for an award of damages to the trier of fact, whether by jury,  
 24 judge, arbitrator or mediator, in an amount that exceeds the amount of seventy-five thousand  
 25 dollars and zero cents (\$75,000) per Plaintiff, despite the above-referenced cap of seventy-five  
 26 thousand dollars and zero cents (\$75,000) per Plaintiff.

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**ORDER**

IT IS SO ORDERED this 14<sup>th</sup> day of February, 2018.



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RICHARD F. BOULWARE, II  
United States District Court

IT IS FURTHER ORDERED that [27] Stipulation re: Damages is denied as moot.

