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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 EARL BRAXTON and VIRGINIA
12 BRAXTON,

Case No.: 2:17-cv-01816-APG-VCF

13 Plaintiffs,

14 v.

15 MOSHIR ELHABBAL; ES EXPRESS LINES,
16 INC.; DOE INDIVIDUALS I through X,
inclusive; and ROE CORPORATIONS I
17 through X, inclusive,

18 Defendants.

19
20 **STIPULATION AND ORDER TO TRANSFER VENUE**

21 COME NOW, Plaintiffs EARL BRAXTON and VIRGINIA BRAXTON, by and through
22 their attorneys of record, Matthew W. Hoffmann, Esq. and Sabrina G. Wibicki, Esq. of the law firm
23 of Atkinson Watkins & Hoffmann, LLP, and Defendants MOSHIR ELHABBAL and ES
24 EXPRESS LINES, INC., by and through their attorneys of record, Christian Moore, Esq. of the law
25 firm of Lemons, Grundy & Eisenberg, and submit this Stipulation for Transfer of Venue as follows:
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1 IT IS HEREBY STIPULATED AND AGREED that a lawsuit relative to the above-
2 referenced matter was filed on June 30, 2017 in the United States District Court for the District of
3 Nevada.

4 IT IS HEREBY STIPULATED AND AGREED that, based on the representations by the
5 parties regarding the location of the subject collision (San Bernadino County) and the Defendant
6 driver's purpose and route for the subject trip, both of which give rise to the allegations set forth in
7 the Complaint filed in this action, the above-captioned matter be transferred to the United States
8 District Court for the Central District of California pursuant to 28 U.S.C. § 1404, which provides:
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10 For the convenience of parties and witnesses, in the interest of justice,
11 a district court may transfer any civil action to any other district or division
12 where it might have been brought or to any district or division to which all
13 parties have consented.

14 IT IS HEREBY STIPULATED AND AGREED that all pretrial deadlines before the United
15 States District Court for the District of Nevada be stayed pending the requested transfer and, upon
16 granting of the same, the parties will coordinate new deadlines for filing with the United States
17 District Court for the Central District of California.

18 DATED this 30th day of January, 2018.

DATED this 30th day of January, 2018.

19 ATKINSON WATKINS & HOFFMANN, LLP

LEMONS, GRUNDY & EISENBERG

20 / s / Sabrina G. Wibicki, Esq.

/ s / Christian L. Moore, Esq.

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28 Attorneys for Plaintiffs

ORDER

1 Good cause being shown therefore,

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3 IT IS HEREBY ORDERED that, by stipulation and consent between the parties, and in
4 furtherance of the interests of justice, this action shall be, and hereby is, transferred from the United
5 States District Court for the District of Nevada to the United States District Court for the Central
6 District of California.

7 Dated: 1/30/2018


UNITED STATES DISTRICT JUDGE

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