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14	UNITED STATES DISTRICT COURT		
	DISTRICT OF NEVADA		
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16	TERRY CORYELL, Individually,) CASE NO.: 2:18-cv-00593-GMN-NJK	
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18	Plaintiff,) JOINT STIPULATION AND ORDER	
	VS.) EXTENDING TIME FOR DEFENDANT) TRINITY INDUSTRIES, INC. TO	
19	UNITED STATES OF AMERICA,	RESPOND TO COMPLAINT	
20	DEPARTMENT OF THE NAVY; CMI)) (FIRST REQUEST)	
0.1	CORPORATION; TRINITY INDUSTRIES,		
21	INC.; DOES I-X, and ROE CORPORATIONS I-X, inclusive,		
22			
23	Defendants		
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	COME NOW Plaintiff Terry Corvell ("Plaintiff") and Defendent Trinity Industries Inc.	
25	COME NOW, Plaintiff Terry Coryell ("Plaintiff") and Defendant Trinity Industries Inc.		
26	("Defendant"), by and through their counsel of record, and hereby stipulate and agree to allow the		
27	Defendant an additional sixty (60) days to respond to Plaintiff's Complaint.		
28			
	- 1 -		
	JOINT SITPULATION AND ORDER EXTENDING TIME FOR DEFENDANT TRINITY INDUSTRIES, INC. TO RESPOND TO COMPLAINT		

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Plaintiff commenced this action with the Complaint filed April 2, 2018. Plaintiff served Defendant with the Complaint on April 18, 2018. Defendant's response is currently due on May 9, 2018.

In the interim, on April 26, 2018, Defendant served Plaintiff with correspondence which Defendant contends demonstrates that Defendant is not a proper party to this action. Specifically, Defendant contends this correspondence attached documentation demonstrates that it did not (1) manufacture, (2) place into the stream of commerce, or (3) assume any liabilities related to the design, manufacture, or marketing of the subject grinder. Under applicable law, the facts outlined in this correspondence—if true—preclude any liability on the part of Defendant as a matter of law.

So as to (1) allow Plaintiff a meaningful opportunity to investigate the accuracy of the documentation provided by Defendant, and (2) correspondingly allow the Defendant in the interim to forgo further litigation expenses, including those associated with engagement of local counsel, the parties stipulate and jointly request that the Defendant's response to the Complaint will—subject to the Court's approval—now be due on July 8, 2018.

DATED this $\underline{8^{th}}$ day of May, 2018

/s/ Samantha A. Martin

SAMANTHA A. MARTIN, ESQ.Nevada Bar No. 12998**RICHARD HARRIS LAW FIRM**801 South Fourth StreetLas Vegas, Nevada 89101Attorney for Plaintiff

DATED this <u>8th</u> day of May, 2018

/s/ James B. Greer

JAMES B. GREER (Engagement of Local Counsel and Pro Hac Vice Forthcoming) Texas Bar No. 24014739 5910 N. Central Expressway, Ste. 925 Dallas, Texas 75206 Attorney for Defendant Trinity Industries, Inc.

- 2 -JOINT SITPULATION AND ORDER EXTENDING TIME FOR DEFENDANT TRINITY INDUSTRIES, INC. TO RESPOND TO COMPLAINT

1	ORDER	
2	Demonstrate the formation attendation and and here there is there form Defendent Trivite	
3	Pursuant to the foregoing stipulation and good cause showing therefore: Defendant Trinity	
4	Industries, Inc. will have until July 9, 2018, to respond to Plaintiff's Complaint.	
5	IT IS SO ORDERED.	
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7	NANCY J. KORPE	
8	UNITED STATES MAGISTRATE JUDGE	
9	DATED: <u>May 8, 2018</u>	
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