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6 and

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11 *Attorneys for Plaintiff Sustainable*  
 12 *Modular Management, Inc.*

13 UNITED STATES DISTRICT COURT  
 14 DISTRICT OF NEVADA

15 UNITED STATES OF AMERICA, for the use  
 and benefit of SUSTAINABLE MODULAR  
 16 MANAGEMENT, INC., a Texas corporation,

17 *Plaintiff,*

18 v.

19 JE DUNN CONSTRUCTION COMPANY;  
 FEDERAL INSURANCE COMPANY;  
 20 HARTFORD FIRE INSURANCE COMPANY;  
 TRAVELERS CASUALTY AND SURETY  
 21 COMPANY OF AMERICA; DOE Individuals I-  
 X and DOE Entities I-X, inclusive,

22 *Defendants.*

Case No. 2:20-cv-00790- GMN-NJK

**ADDENDUM TO  
 JOINT PRETRIAL ORDER  
 SUBMITTING TRIAL DATES**

25 Plaintiff, United States of America, for the use and benefit of Sustainable Modular  
 26 Management, Inc. (“SMM”), Defendant/Counterclaimant JE Dunn Construction Company  
 27 (“JE Dunn”), and Defendants Federal Insurance Company, Hartford Fire Insurance Company, and  
 28

1 Travelers Casualty and Surety Company (collectively “Surety Defendants”) submit this addendum to  
2 the Proposed Joint Pretrial Order submitted on December 13, 2024 [Dkt. 156].

3  
4 **IX.**

5 The attorneys and parties have met and jointly offer these three dates for commencement of  
6 the trial in this matter:

7 July 28, 2025 – all week available.  
8 August 4, 2025 – all week available.  
9 August 11, 2025 – with conflicts on August 14 and 15, 2025.

10 If the trial commences on August 11, 2025, a conflict exists the following week on August 19, 2025.  
11 Counsel are committed to working together on the order of witnesses and calling witnesses out of order  
12 to accommodate witness schedules, including allowing certain witnesses to testify remotely using video.

13 DATED December 20, 2024.

14 HARTWELL THALACKER, LTD

LEWIS ROCA ROTHGERBER CHRISTIE LLP

15 By: /s/ Michael S. Alfred  
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By: /s/ Robert Roos  
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*Attorneys for Defendant/Counterclaimant  
JE Dunn Construction Company and Surety Defendants*

23 *Attorneys for Plaintiff*  
24  
25  
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XII.

ACTION BY THE COURT

This case is set for a bench trial on the ~~fixed~~/stacked calendar on July 28, 2025 at 8:30 a.m..  
Calendar call will be held on July 22, 2025 at 9:00 a.m..

DATED: January 6, 2025

*(SMM estimates that the trial will take between 7 and 10 days. JE Dunn estimates the trial will require 12 to 15 days.)*

  
UNITED STATES DISTRICT JUDGE

United States of America for the use and benefit  
of Sustainable Modular Management Inc. v. JE  
Dunn Construction Company, et al.  
2:20-cv-00790-GMN-NJK  
Addendum to Proposed Joint Pretrial Order

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**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b) and Section IV of District of Nevada Electronic Filing Procedures, I certify that on December 20, 2024, that the above ADDENDUM TO JOINT PRE-TRIAL ORDER was served via electronic service on all counsel of record.

/s/ Edye Buxbaum  
An Employee of VerisLaw, PLLC