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8
*LM General Insurance Company,
erroneously named as LM General
Insurance Company aka Liberty Mutual
Insurance Company*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 EMILY SCHULTZ and DANIEL SCHULTZ,
12 individually and as a Natural Parent and
Guardian of E. S., a minor,

13 Plaintiffs,

14 v.

15 LM GENERAL INSURANCE COMPANY
16 aka LIBERTY MUTUAL INSURANCE
17 COMPANY, a foreign corporation; and
18 DOES I through X; and ROE
CORPORATIONS I through X, inclusive,

19 Defendants.

CASE NO.: 2:22-cv-00523-GMN-DJA

**JOINT MOTION TO STAY PENDING
MEDIATION**

20 Plaintiffs Emily Schultz and Daniel Schultz (“Plaintiffs”) and Defendant LM General
21 Insurance Company (“LM”) submits the following Joint Motion to Stay Pending Mediation.

22 On February 22, 2022, the Nevada Division of Insurance sent the Summons and Complaint
23 to LM. *See*, Nevada Commissioner of Insurance Letter (ECF No. 1-3). On March 24, 2022
24 Defendant LM removed this matter to Federal Court on diversity grounds under 28 U.S.C. §
25 1441(b). (ECF No. 1.) On March 30, 2022, the parties stipulated to a thirty (30) day extension of
26 time for LM to respond to the Complaint in an attempt work out a potential resolution. (ECF No.
27 5). The parties believe that settlement is possible and are currently engaged in settlement
28 negotiations and stipulated to extend LM’s response deadline to May 2, 2022. On March 31, 2022,

1 the Court granted the stipulation to extend LM's response deadline to May 2, 2022. (ECF No. 6).

2 On April 11, 2022, Defendant LM filed its Statement Regarding Removal. (ECF No. 7).

3 The parties have agreed to a private mediation that is scheduled to take place on
4 June 21, 2022 before Hon. Jennifer Tigliatti (ret.). It is the parties' hope that this case can be
5 resolved at this time.

6 Wherefore, the parties respectfully request that the Court stay this action, including the
7 exchange of Fed. R. Civ. P. 26(a)(1) disclosure, pending completion of a private mediation that
8 is scheduled to take place on June 21, 2022 before Hon. Jennifer Tigliatti (ret.).

9 Dated: April 29, 2022

10 JEREZ LAW, PLLC

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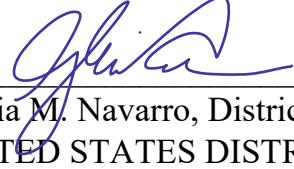
21 *Attorneys for Defendant*
22 *LM General Insurance Company,*
23 *erroneously named as LM General*
24 *Insurance Company aka Liberty Mutual*
25 *Insurance Company*

ORDER

26 **IT IS SO ORDERED.**

27 **IT IS FURTHER ORDERED** that the parties must file a joint status report
28 informing the Court of the progress of the mediation proceedings every ninety (90)
days, beginning on August 5, 2022.

29 Dated this 9 day of May, 2022.

30 
31 _____
32 Gloria M. Navarro, District Judge
33 UNITED STATES DISTRICT COURT