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

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

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

Plaintiffs,

v.

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

Defendants.

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

**JOINT MOTION TO STAY PENDING  
 MEDIATION**

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

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

the Court granted the stipulation to extend LM's response deadline to May 2, 2022. (ECF No. 6).  
On April 11, 2022, Defendant LM filed its Statement Regarding Removal. (ECF No. 7).

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

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

Dated: April 29, 2022

JEREZ LAW, PLLC

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/s/ Isaiah A. Jerez

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*Attorneys for Defendant  
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Insurance Company*

### **ORDER**

**IT IS SO ORDERED.**

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

Dated this 9 day of May, 2022.

  
\_\_\_\_\_  
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT