

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PAT LUNDVALL (NSBN 3761)
McDONALD CARANO WILSON LLP
100 West Liberty Street, 10th Floor
P.O. Box 2670
Reno, Nevada 89505-2670
lundvall@mcdonaldcarano.com
Telephone: (775) 788-2000
Facsimile: (775) 788-2020

Attorneys for Plaintiff/Counter-Defendant
Winnemucca Farms, Inc.

<input checked="" type="checkbox"/> FILED	<input type="checkbox"/> RECEIVED
<input type="checkbox"/> ENTERED	<input type="checkbox"/> SERVED ON
COUNSEL/PARTIES OF RECORD	
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> <p>MAY 25 2011</p> </div>	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WINNEMUCCA FARMS, INC., a Nevada Corporation,

Plaintiff,

vs.

LANCE ECKERSELL, ECKERSELL GROUP, INC., ARMtech INSURANCE SERVICES, INC., GUIDEONE SPECIALTY MUTUAL INSURANCE CO., WESTERN NATIONAL MUTUAL INSURANCE CO., AMERICAN AGRI-BUSINESS INSURANCE CO., and DOES 1-30, inclusive,

Defendants.

CASE NO.: 3:05-CV-00385-RAM

STIPULATION FOR DISMISSAL WITH PREJUDICE

ARMtech INSURANCE SERVICES, INC., GUIDEONE SPECIALTY MUTUAL INSURANCE CO., WESTERN NATIONAL MUTUAL NSURANCE CO., and AMERICAN AGRI-BUSINESS INSURANCE CO.,

Counter Claimants,

vs.

WINNEMUCCA FARMS, INC., a Nevada corporation,

Counter-Defendant,

Winnemucca Farms Inc., VS Lance Eckersell et al

1 Plaintiff/Counter-Defendant WINNEMUCCA FARMS, INC., and Defendants
2 LANCE ECKERSELL, and ECKERSELL GROUP, INC., and Defendants/Counter-
3 Claimants ARMtech INSURANCE SERVICES, INC., GUIDEONE SPECIALITY
4 MUTUAL INSURANCE CO., WESTERN NATIONAL MUTUAL INSURANCE CO., and
5 AMERICAN AGRI-BUSINESS INSURANCE CO. stipulate and agree to dismiss with
6 prejudice any and all claims by and among them in the above-referenced actions, with
7 each party to bear their own costs and attorneys' fees.

8 IT IS FURTHER STIPULATED that the Court may retain jurisdiction over this
9 matter to enforce any issue concerning enforcement of the Settlement Agreement and
10 Release between the parties.

11
12 Dated: May 24, 2011

By: /s/ Pat Lundvall
Pat Lundvall
McDonald Carano Wilson LLP
100 W. Liberty Street, 10th Floor
Reno, Nevada 89505

Attorney for Plaintiff/Counter-Defendant
WINNEMUCCA FARMS, INC.

17 ///
18 ///
19 ///
20 ///
21 ///
22 ///
23 ///
24 ///
25 ///
26 ///
27 ///
28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: May 24, 2011

By: /s/ Scott Hoffman

Lewis and Roca, LLP
Bank of America Plaza
50 W. Liberty St., Suite 410
Reno, NV 89501

Attorney for Defendants Lance Eckersell and
the Eckersell Group, Inc.

Dated: May 24, 2011

By: /s/ Marshall S. Smith

Marshall S. Smith
Laxalt & Nomura
9600 Gateway Drive
Reno, NV 89521

Attorney for Defendants/Counter-Claimants
ARMtech Insurance Services Inc., Guideone
Specialty Mutual Insurance Co., Western
National Mutual Insurance Co., and American
Agri-Business Insurance Co.

ORDER AND RETENTION OF JURISDICTION

IT IS ORDERED that the above-referenced matter is dismissed with prejudice,
with each party to bear their own attorneys' fees. The Court shall retain jurisdiction over
this matter to enforce any issue concerning enforcement of the parties' Settlement
Agreement and Release.

Dated: May 25, 2011



UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify, under penalty of perjury, that I am an employee of McDonald Carano Wilson ^{LLP} and that pursuant to LR 5-3 I caused to be electronically filed on this date, a true and correct copy of the STIPULATION FOR DISMISSAL WITH PREJUDICE with the Clerk of the Court using the CM/ECF system, which will automatically e-serve the same on the attorneys of record set forth below.

David C. McElhinney and Scott S. Hoffmann
LEWIS AND ROCA, LLP
Bank of America Plaza
50 West Liberty Street, Suite 410
Reno, Nevada 89501
Attorneys for Defendants Lance Eckersell and Eckersell Group, Inc.

Marshall S. Smith
Laxalt & Nomura
9600 Gateway Dr.
Reno, Nevada 89521
*Attorney for Defendants ARMtech Insurance Services Inc.,
Guideone Specialty Mutual Insurance, Co.,
Western National Mutual Insurance Co. and
American Agri-Business Insurance Co.*

DATED: this 24th day of May, 2011

By: /s/Sally Wexler
Sally Wexler