

STEVEN T. JAFFE, ESQ.  
Nevada Bar No. 007035  
[sjaffe@lawhjc.com](mailto:sjaffe@lawhjc.com)  
DANIEL C. TETREAUULT, ESQ.  
Nevada Bar No. 011473  
[dtetreault@lawhjc.com](mailto:dtetreault@lawhjc.com)

**HALL JAFFE & CLAYTON, LLP**  
7425 Peak Drive  
Las Vegas, Nevada 89128  
(702) 316-4111  
Fax (702) 316-4114

*Attorneys for Defendants Kentucky  
Western Co., and Martin Douglas  
Wilson*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

LORI JEAN YAHN, individually and as co-  
Special Administrator of the Estate of  
TIMOTHY J. YAHN, deceased; KYLE  
JAMES YAHN, individually; ZACHARY  
LEE YAHN, individually; ALEXANDER  
SCOTT YAHN, individually; JANICE  
GONALEZ, as Co-Special Administrator of  
the Estate of TIMOTHY J. YAHN, deceased,

Plaintiffs,

v.

KENTUCKY WESTERN CO., a foreign  
corporation; MARTIN DOUGLAS WILSON,  
an individual; DOES 1 through 10; ROE  
ENTITIES 11 through 20; and ABC  
LIMITED LIABILITY COMPANIES 21  
through 30,

Defendants.

CASE NO. 3:21-cv-00227-MMD-WGC  
Formerly Case No. 2:21-cv-00890

**[PROPOSED] STIPULATION AND  
ORDER TO EXTEND THE TIME TO  
FILE DEFENDANTS' RESPONSE TO  
PLAINTIFFS' MOTION TO REMAND**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs LORI JEAN  
YAHN, KYLE JAMES YAHN, ZACHARY LEE YAHN, ALEXANDER SCOTT YAHN,  
and JANICE GONALEZ, by and through their attorneys, VICTORIA R. ALLEN, ESQ. of the  
law firm of NETTLES & MORRIS, and Defendants KENTUCKY WESTERN CO., and  
MARTIN DOUGLAS WILSON, by and through their attorneys, STEVEN T. JAFFE, ESQ.,

1 and DANIEL C. TETREAULT, ESQ. of the law firm of HALL JAFFE & CLAYTON, LLP,  
2 that the time to respond to the Plaintiff's Motion to Remand will be extended from June 4,  
3 2021 to June 11, 2021.

4 **IT IS SO STIPULATED.**

5 DATED this 3<sup>rd</sup> day of June, 2021.

6 HALL JAFFE & CLAYTON, LLP

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8 /s/ Steven T. Jaffe, Esq.  
9 STEVEN T. JAFFE, ESQ.  
10 Nevada Bar No. 007035  
11 DANIEL C. TETREAULT, ESQ.  
12 Nevada Bar No. 011473  
13 7425 Peak Drive  
14 Las Vegas, Nevada 89128  
15 *Attorneys for Defendants*  
16 *Kentucky Western Co., and Martin*  
17 *Douglas Wilson*

DATED this 3<sup>rd</sup> day of June, 2021.

NETTLES | MORRIS

/s/ Victoria R. Allen  
BRIAN D. NETTLES, ESQ.  
Nevada Bar No. 7462  
CHRISTIAN M. MORRIS, ESQ.  
Nevada Bar No. 11218  
VICTORIA R. ALLEN, ESQ.  
Nevada Bar No. 15005  
1389 Galleria Drive, Suite 200  
Henderson, Nevada 89014  
*Attorneys for Plaintiffs*

14 **ORDER**

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17 IT IS FURTHER ORDERED that Defendants' Response to Plaintiffs' Motion to  
18 Remand shall be due on June 11, 2021.

19 DATED this 3<sup>rd</sup> day of June, 2021.

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FEDERAL COURT JUDGE