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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

11 LORI JEAN YAHN, individually and as co-
12 Special Administrator of the Estate of
13 TIMOTHY J. YAHN, deceased; KYLE
14 JAMES YAHN, individually; ZACHARY
15 LEE YAHN, individually; ALEXANDER
16 SCOTT YAHN, individually; JANICE
17 GONALEZ, as Co-Special Administrator of
the Estate of TIMOTHY J. YAHN,
18 deceased,
19
20 Plaintiff,
21
22 vs.
23
24 KENTUCKY WESTERN CO., a foreign
corporation; MARTIN DOUGLAS
25 WILSON, an individual; DOES 1 through
26 10; ROE ENTITIES 11 through 20; and
27 ABC LIMITED LIABILITY COMPANIES
28 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 PLAINTIFF’S REPLY TO
DEFENDANT’S OPPOSITION TO
PLAINTIFF’S MOTION TO REMAND**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, LORI JEAN YAHN, individually and as co-Special Administrator of the Estate of TIMOTHY J. YAHN,

1 deceased (“Plaintiff Lori”); KYLE JAMES YAHN, individually (“Plaintiff Kyle”); ZACHARY
2 LEE YAHN, individually (“Plaintiff Zachary”); ALEXANDER SCOTT YAHN, individually
3 (“Plaintiff Alexander); JANICE GONALEZ, as Co-Special Administrator of the Estate of
4 TIMOTHY J. YAHN, deceased (hereinafter collectively “Plaintiffs”), by and through their
5 counsels of record, Brian D. Nettles, Esq., Christian M. Morris, Esq. and Victoria R. Allen, Esq.,
6 of the law firm Nettles | Morris, and Defendants KENTUCKY WESTERN CO., and MARTIN
7 DOUGLAS WILSON, by and through their attorneys, STEVEN T. JAFFE, ESQ. and DANIEL
8 C. TETREAULT, ESQ. of the law firm HALL JAFFE & CLAYTON, LLP, that the time to reply
9 to Defendant’s Opposition to Plaintiff’s Motion to Remand be extended from June 22, 2021 to
10 June 24, 2021.

11 Dated this 23rd day of June, 2021.

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13 /s/ Victoria R. Allen
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22 *Attorneys for Plaintiff*

Dated this 23rd day of June, 2021.


HALL JAFFE & CLAYTON, LLP

/s/Daniel C. Tetreault
DANIEL C. TETREAULT, ESQ.
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Attorneys for Defendants

ORDER

IT IS FURTHER ORDERED that Plaintiff’s Reply to Defendant’s Opposition to
Plaintiff’s Motion to Remand shall be due June 24, 2021.

DATED this 24th day of June, 2021.



FEDERAL COURT JUDGE