

CLERK OF THE COURT

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Tracie K. Lindeman  
Clerk of Supreme Court

**NOAS**

Vaughn A. Crawford, Nevada Bar No. 7665

Jay J. Schuttart, Nevada Bar No. 8656

Morgan T. Petrelli, Nevada Bar No. 13221

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Attorneys for Defendant

FORD MOTOR COMPANY

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

TERESA GARCIA TREJO as the Successor-  
in-Interest and Surviving Spouse of Rafael  
Trejo, Deceased,

Plaintiff,

vs.

FORD MOTOR COMPANY,

Defendant.

Case No.: A-11-641059-C

Dept. No.: XXI

**NOTICE OF APPEAL**

Notice is given that Defendant Ford Motor Company appeals to the Supreme Court of Nevada from (1) the October 7, 2014, judgment on the jury's special verdict and the March 19,

1 2015, amended judgment; (2) from the District Court's March 19, 2015, Order denying Ford's  
2 Renewed Motion for Judgment as a Matter of Law or, in the alternative, for a New Trial; and  
3 (3) from the District Court's March 19, 2015, Order awarding Plaintiff \$356,703.51 in costs.

4 A copy of the Notice of Entry of the Judgment, which was filed and served on October 8,  
5 2014, is attached hereto as Exhibit 1. A copy of the Notice of Entry of the District Court's Order  
6 denying Ford's Renewed Motion for Judgment as a Matter of Law or, in the alternative, for a  
7 New Trial and denying in part Ford's Motion to Tax Costs, which was filed and served on  
8 March 19, 2015, is attached hereto as Exhibit 2.

9  
10 DATED this 10 day of April, 2015.

11 SNELL & WILMER L.L.P.

12  
13 By: 

Vaughn A. Crawford, Nevada Bar No. 7665  
Jay J. Schuttart, Nevada Bar No. 8656  
Morgan T. Petrelli, Nevada Bar No. 13221  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, NV 89169

16 Michael W. Eady (*Pro Hac Vice*)  
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Austin, TX 78701

18 Lisa Perrochet (*Pro Hac Vice*)  
19 Emily V. Cuatto (*Pro Hac Vice*)  
Horvitz & Levy LLP  
20 15760 Ventura Boulevard, 18th Floor  
Encino, CA 91436

21 Attorneys for Defendant  
22 FORD MOTOR COMPANY  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **NOTICE OF APPEAL** by the method indicated below:

XXXXX Electronic Service (Wiznet)

and addressed to the following:

***Electronic Service (Wiznet)***

Brian D. Nettles, Esq.  
William R. Killip, Jr. Esq.  
NETTLES LAW FIRM  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
Telephone: (702) 434-8282  
Facsimile: (702) 434-1488  
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Email: [bill@nettlawfirm.com](mailto:bill@nettlawfirm.com)  
Attorneys for Plaintiffs

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LAWRENCE LAW FIRM  
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Telephone: (956) 994-0057  
Facsimile: (956) 994-0741  
Attorney for Plaintiffs

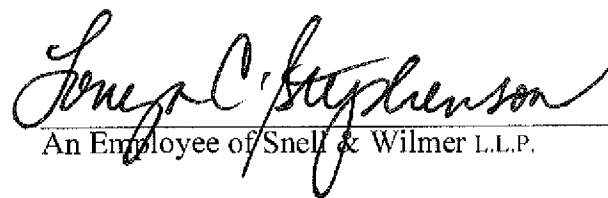
***Electronic Service (Wiznet – courtesy copy)***

Email: [Ric@gomlaw.com](mailto:Ric@gomlaw.com)  
Email: [Jody@gomlaw.com](mailto:Jody@gomlaw.com)  
Ricardo A. Garcia, Esq. (*Pro Hac Vice*)  
Jody R. Mask, Esq. (*Pro Hac Vice*)  
GARCIA OCHOA MASK  
820 South Main Street  
McAllen, TX 78501  
Telephone: (956) 630-2882  
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Attorneys for Plaintiffs

***Electronic Service (Wiznet)***

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Facsimile: (702) 583-3330  
Email: [bsterling@sterlinglaw.com](mailto:bsterling@sterlinglaw.com)  
Attorneys for Plaintiffs

DATED this 16<sup>th</sup> day of April, 2015.

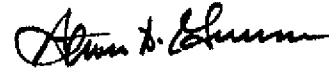
  
An Employee of Snell & Wilmer L.L.P.

20145202.1

# **EXHIBIT 1**

# **EXHIBIT 1**





CLERK OF THE COURT

1 **NEOJ**  
2 **BRIAN D. NETTLES, ESQ.**  
3 Nevada Bar No. 7462  
4 **WILLIAM R. KILLIP, JR, ESQ.**  
5 Nevada Bar No. 3660  
6 **NETTLES LAW FIRM**  
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11 [briannettles@nettleslawfirm.com](mailto:briannettles@nettleslawfirm.com)  
12 [bill@nettleslawfirm.com](mailto:bill@nettleslawfirm.com)

13 **Ricardo A. Garcia, Esq.**  
14 **LAW OFFICES OF GARCIA & KARAM**  
15 820 South Main Street  
16 McAllen, TX 78501  
17 Telephone Number: (956) 630-2882  
18 Facsimile Number: (956) 630-5393  
19 Attorneys for Plaintiffs

20 **DISTRICT COURT**

21 **CLARK COUNTY, NEVADA**

22 **TERESA GARCIA TREJO, et al.**

23 **Plaintiffs,**

24 **vs.**

25 **ALAN KORANSKY, FORD MOTOR**  
26 **COMPANY, DOES 1 through 10, ROE**  
27 **CORPORATIONS 11 through 20, inclusive**

28 **Defendants.**

Case No.: A-11-641059-C

Dept. No.: XXI

**NOTICE OF ENTRY OF JUDGMENT UPON JURY VERDICT**

TO: ALL PARTIES; and

TO: THEIR RESPECTIVE ATTORNEYS.

...

...

**NETTLES LAW FIRM**  
1389 Galleria Drive, Suite 110  
Henderson, NV 89014  
702.434.8282 / 702.434.1488 (fax)

**PLEASE TAKE NOTICE** that a Judgment Upon Jury Verdict was dully entered on the above-entitled matter on 7<sup>th</sup> day of October, 2014, a true and correct copy of said Judgment Upon Jury Verdict is attached hereto.

DATED this 2 day of October, 2014.

NETTLES LAW FIRM

By [Signature]  
BRIAN D. NETTLES, ESQ.)  
Nevada Bar No. 7462  
WILLAM R. KILLIP, JR., ESQ.  
Nevada Bar No. 3660  
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Henderson, Nevada 89014  
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[bill@netttleslawfirm.com](mailto:bill@netttleslawfirm.com)  
Attorneys for Plaintiffs

**NETTLES LAW FIRM**

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Henderson, NV 89014

702.434.8282 / 702.434.1488 (fax)

1 **CERTIFICATE OF E-SERVICE**

2 Pursuant to NEFCR 9, NRCP 5(b) and EDCR 7.26, I hereby certify that on the 8<sup>th</sup> day  
3 of October, 2014, a true and correct copy of the foregoing *Notice of Entry of Judgment Upon*  
4 *Jury Verdict* was served to the following party electronic transmission through the Wiznet  
5 system:

6 Michael R. Hall, Esq.  
7 HALL JAFFE & CLAYTON, LLP  
8 7455 West Washington Avenue, Suite 460  
Las Vegas, NV 89128  
9 Telephone Number: (702) 316-4111  
10 Facsimile Number: (702) 316-4114  
Attorney for Defendant,  
11 *Alan Koransky*

Joshua D. Cools, Esq.  
Jay J. Schutttert, Esq.  
SNELL & WILMER, LP  
3883 Howard Hughes Parkway, Suite 110  
Las Vegas, NV 89169  
Telephone Number: (702) 784-5200  
Facsimile Number: (702) 784-5252  
Attorney for Defendant,  
*Ford Motor Company*

12 **CERTIFICATE OF SERVICE BY MAIL**

13 Pursuant to NRCP 5(b) and EDCR 7.26, I hereby certify that on the 8<sup>th</sup> day of October,  
14 2014, a true and correct copy of the foregoing *Notice of Entry of Judgment Upon Jury Verdict*  
15 was served to the following party by facsimile and regular mail, addressed as follows, as they  
16 have not been added to the E-Service Master List on Wiznet:

17  
18 Ricardo A. Garcia, Esq.  
19 LAW OFFICES OF GARCIA & KARAM  
820 South Main Street  
20 McAllen, TX 78501  
Telephone Number: (956) 630-2882  
21 Facsimile Number: (956) 630-5393  
22 *Attorney for Plaintiffs*

Larry W. Lawrence, Jr., Esq.  
LAWRENCE LAW FIRM  
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Facsimile Number: (956) 994-0741  
*Attorneys for Plaintiffs*

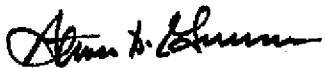
23  
24 

25 An employee of the  
26 NETTLES LAW FIRM  
27  
28

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702.434.8282 / 702.434.1488 (fax)

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CLERK OF THE COURT

1 BRIAN D. NETTLES, ESQ.  
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2 WILLIAM R. KILLIP, JR, ESQ.  
Nevada Bar No. 3660  
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7 [bill@nettlslawfirm.com](mailto:bill@nettlslawfirm.com)

8 Ricardo A. Garcia, Esq.  
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10 McAllen, TX 78501  
Telephone Number: (956) 630-2882  
11 Facsimile Number: (956) 630-5393  
12 Attorneys for Plaintiffs

13 **DISTRICT COURT**

14 **CLARK COUNTY, NEVADA**

15 TERESA GARCIA TREJO, et al.

16  
17 Plaintiffs,

18 vs.

19 ALAN KORANSKY, FORD MOTOR  
20 COMPANY, DOES 1 through 10, ROE  
CORPORATIONS 11 through 20, inclusive

21  
22 Defendants.  
23

Case No.: A-11-641059-C

Dept. No.: XXI

24 **JUDGMENT UPON JURY VERDICT**

25 This action having come on for trial beginning on the 8<sup>th</sup> day of September, 2014, before  
26 the Court and a jury, Honorable Valerie Adair, District Judge, presiding, the issues having been  
27 duly tried and the jury having duly rendered its verdict on September 23, 2014:  
28 ...

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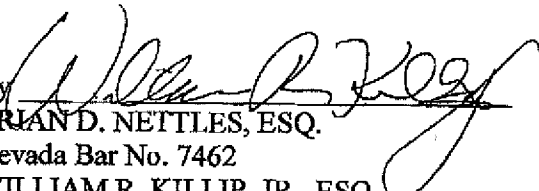
1 IT IS ORDERED AND ADJUDGED that Plaintiff Teresa Garcia Trejo recover from  
2 Defendant Ford Motor Company the principal sum of four million five hundred thousand dollars  
3 and 00/100 (\$4,500,000.00), together with pre-judgment interest in the amount of \$517,376.70,  
4 with interest on the principal amount of the judgment accruing at the rate of 5.25 percent per  
5 annum as provided by law. Plaintiff may apply separately for her costs and attorneys' fees and an  
6 amended judgment will be entered accordingly.

7  
8 DATED this 3<sup>rd</sup> day of October, 2014.

9  
10   
11 DISTRICT COURT JUDGE *per*

12  
13  
14 Submitted by:

15 NETTLES LAW FIRM

16  
17 By   
18 BRIAN D. NETTLES, ESQ.  
19 Nevada Bar No. 7462  
20 WILLIAM R. KILLIP, JR., ESQ.  
21 Nevada Bar No. 3660  
22 1389 Galleria Drive, Suite 200  
23 Henderson, Nevada 89014  
24 Telephone: (702) 434-8282  
25 Facsimile: (702) 434-1488  
26 [briannettles@nettleslawfirm.com](mailto:briannettles@nettleslawfirm.com)  
27 [bill@nettleslawfirm.com](mailto:bill@nettleslawfirm.com)  
28 Attorneys for Plaintiff

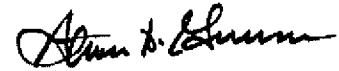
**EXHIBIT 2**

**EXHIBIT 2**

**NETTLES LAW FIRM**

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Henderson, NV 89014  
702.434.8282 / 702.434.1488 (fax)

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CLERK OF THE COURT

1 **NEOJ**

2 BRIAN D. NETTLES, ESQ.

3 Nevada Bar No. 7462

4 WILLIAM R. KILLIP, JR., ESQ.

5 Nevada Bar No. 3660

6 NETTLES LAW FIRM

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8 Henderson, Nevada 89014

9 Telephone: (702) 434-8282

10 Facsimile: (702) 434-1488

11 *Attorney for Plaintiffs*

12 Ricardo A. Garcia, Esq.

13 LAW OFFICES OF GARCIA & KARAM

14 820 South Main Street

15 McAllen, TX 78501

16 Telephone Number: (956) 630-2882

17 Facsimile Number: (956) 630-5393

18 *Plaintiffs Attorney Pro Hac Vice*

19 Larry W. Lawrence, Jr., Esq.

20 LAWRENCE LAW FIRM

21 3112 Windsor Rd. #A234

22 Austin, Texas 78703

23 Telephone Number: (956) 994-0057

24 Facsimile Number: (956) 994-0741

25 *Plaintiffs Attorney Pro Hac Vice*

18 **DISTRICT COURT**

19 **CLARK COUNTY, NEVADA**

20 TERESA GARCIA TREJO, et al.

21 Plaintiffs,

22 vs.

23 ALAN KORANSKY, FORD MOTOR

24 COMPANY, DOES 1 through 10, ROE

25 CORPORATIONS 11 through 20, inclusive

26 Defendants.

Case No.: A-11-641059-C

Dept. No.: XXI

**NOTICE OF ENTRY ORDER**

**NETTLES LAW FIRM**  
1389 Galleria Drive, Suite 110  
Henderson, NV 89014  
702.434.8282 / 702.434.1488 (fax)

**NOTICE OF ENTRY ORDER**

TO: ALL PARTIES; and  
TO: THEIR RESPECTIVE ATTORNEYS.

**PLEASE TAKE NOTICE** that an Order was dully entered on the above-entitled matter on 19<sup>th</sup> day of March, 2015, a true and correct copy of said Order is attached hereto.

DATED this 19 day of March, 2015.

NETTLES LAW FIRM

By   
BRIAN D. NETTLES, ESQ.  
Nevada Bar No. 7462  
WILLAM R. KILLIP, JR., ESQ.  
Nevada Bar No. 3660  
1389 Galleria Drive, Suite 200  
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[bill@nettleslawfirm.com](mailto:bill@nettleslawfirm.com)  
Attorneys for Plaintiffs



**CERTIFICATE OF E-SERVICE**

Pursuant to NEFCR 9, NRCP 5(b) and EDCR 7.26, I hereby certify that on the 19<sup>th</sup> day of March, 2015, a true and correct copy of the foregoing *Notice of Entry of Order* was served to the following party electronic transmission through the Wiznet system:

Vaughn A. Crawford, Esq.  
Jay J. Schuttert, Esq.  
Morgan Petrelli, Esq.  
SNELL & WILMER, LP  
3883 Howard Hughes Parkway, Suite 110  
Las Vegas, NV 89169  
Telephone Number: (702) 784-5200  
Facsimile Number: (702) 784-5252  
*Attorney for Defendant  
Ford Motor Company*

Michael W. Eady, Esq.  
THOMPSON COE COUSINS & IRONS,  
L.L.P  
701 Brazos St., 15<sup>th</sup> Fl.  
Austin, Texas 78701  
*Attorney for Defendant  
Ford Motor Company*


Beau Sterling, Esq.  
STERLING LAW, LLC  
228 South 4<sup>th</sup> Street, 1<sup>st</sup> Floor  
Las Vegas, NV 89101  
*Attorney for Plaintiffs*

**CERTIFICATE OF SERVICE BY MAIL**

Pursuant to NRCP 5(b) and EDCR 7.26, I hereby certify that on the 19<sup>th</sup> day of March, 2015, a true and correct copy of the foregoing *Notice of Entry of Order* was served to the following party by facsimile and regular mail, addressed as follows, as they have not been added to the E-Service Master List on Wiznet:

Ricardo A. Garcia, Esq.  
LAW OFFICES OF GARCIA & KARAM  
820 South Main Street  
McAllen, TX 78501  
Telephone Number: (956) 630-2882  
Facsimile Number: (956) 630-5393  
*Attorney for Plaintiffs*

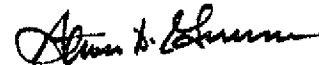
Larry W. Lawrence, Jr., Esq.  
LAWRENCE LAW FIRM  
3112 Windsor Rd. #A234  
Austin, Texas 78703  
Telephone Number: (956) 994-0057  
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*Attorneys for Plaintiffs*

  
An employee of the  
NETTLES LAW FIRM

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**ORIGINAL**

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CLERK OF THE COURT

**ORDR**

BRIAN D. NETTLES, ESQ.

Nevada Bar No. 7462

WILLIAM R. KILLIP, JR., ESQ.

Nevada Bar No. 3660

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*Attorneys for Plaintiffs*

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*Plaintiffs Attorney Pro Hac Vice*

Larry W. Lawrence, Jr., Esq.

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Telephone: (956) 994-0057

Facsimile: (956) 994-0741

*Plaintiffs Attorney Pro Hac Vice*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

TERESA GARCIA TREJO, as The Success-in- )

Interest and Surviving Spouse of Rafael Trejo )

Deceased, )

Plaintiff, )

vs. )

FORD MOTOR COMPANY, )

Defendant. )

Case No.: A-11-641059-C

Dept.: XXI

**ORDER**

///

**Date of Hearing: January 7, 2015**  
**Time of Hearing: 9:30 a.m.**

Plaintiff's Application for Attorneys' Fees, Costs and Interest filed on October 10, 2014; Ford Motor Company's Motion to Retax and Settle Costs and Disbursements filed on October 15, 2014; and Ford Motor Company's Renewed Motion for Judgment as a Matter of Law or, in the alternative, for a New Trial filed on October 21, 2014, came before the Court for hearing on January 7, 2015, before the Honorable Judge Valerie Adair. Plaintiff appeared through her counsel Larry W. Lawrence, Esq., Ricardo Garcia, Esq., Jody R. Mask, Esq., and William R. Killip, Jr., Esq. Defendant appeared through its counsel Jay J. Schuttert, Esq., Morgan T. Petrelli, Esq., and Michael W. Eady, Esq.

The Court having read and considered the pleadings on file, oppositions and replies thereto, and having heard the oral arguments of counsel, and having considered the matter and being fully advised, and good cause appearing therefore, enters the following:

**IT IS HEREBY ORDERED, ADJUDGED AND DECREED** that Defendant Ford Motor Company's Renewed Motion for Judgment as a Matter of Law, or in the Alternative, for a New Trial is hereby **DENIED**.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Court's analysis of the Beattie factors as outlined in the Court's February 18, 2015 Minutes precludes an award of attorneys' fees, and therefore, Plaintiff's Application for Attorneys' Fees is **DENIED**.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Defendant Ford Motor Company's Motion to Retax and Settle Costs and Disbursements is **GRANTED IN PART** and **DENIED IN PART**. Plaintiff is awarded costs in the total amount of three hundred fifty-six thousand seven hundred three dollars and 51/100 cents (\$356,703.51), with interest accruing at the statutory rate beginning October 8, 2014.

///

///

NETTLES LAW FIRM  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
702.434.8282 / 702.434.1488 (fax)

**AMENDED JUDGMENT**

Accordingly,

**IT IS FURTHER ORDERED** that Plaintiff Teresa Trejo is entitled to judgment against Defendant Ford Motor Company as follows:

Jury Verdict:	\$ 4,500,000.00
Pre-Judgment Interest	\$ 517,376.70
<u>Allocated Costs:</u>	<u>\$ 356,703.51</u>
JUDGMENT TOTAL:	\$ 5,374,080.21 <sup>1</sup>

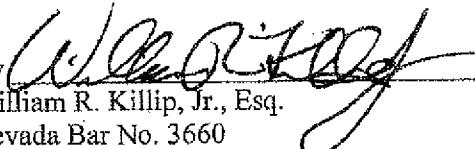
All requested relief not expressly granted herein is denied.

**IT IS SO ORDERED** this 16<sup>th</sup> day of March, 2015.


  
DISTRICT COURT JUDGE *Bo*

<sup>1</sup> All amounts awarded in the Judgment Upon Jury Verdict entered on October 8, 2014, and awarded herein shall bear post-judgment interest at the statutory rate from October 8, 2014 until satisfied.

Respectfully submitted by:  
NETTLES LAW FIRM

By   
William R. Killip, Jr., Esq.  
Nevada Bar No. 3660  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
*Attorneys for Plaintiff*

Approved as to form and content:  
SNELL & WILMER L.L.P.

By   
Vaughn A. Crawford, Esq.  
Nevada Bar No. 7665  
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Nevada Bar No. 8656  
Morgan Petrelli, Esq.  
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Lisa J. Perrochet (Pro Hac Vice)  
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*Attorneys for Defendant*  
*Ford Motor Company*

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**ASTA**

Vaughn A. Crawford, Nevada Bar No. 7665  
Jay J. Schuttert, Nevada Bar No. 8656  
Morgan T. Petrelli, Nevada Bar No. 13221  
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Email: [jschuttert@swlaw.com](mailto:jschuttert@swlaw.com)  
Email: [mpetrelli@swlaw.com](mailto:mpetrelli@swlaw.com)

Michael W. Eady (*Pro Hac Vice*)  
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Telephone: (512) 708-8200  
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Email: [MEady@thompsoncoecoe.com](mailto:MEady@thompsoncoecoe.com)

Lisa Perrochet (*Pro Hac Vice*)  
Emily V. Cuatto (*Pro Hac Vice*)  
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Facsimile: (818) 995-3157  
Email: [lperrochet@horvitzlevy.com](mailto:lperrochet@horvitzlevy.com)  
Email: [ecuatto@horvitzlevy.com](mailto:ecuatto@horvitzlevy.com)

Attorneys for Defendant  
FORD MOTOR COMPANY

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

TERESA GARCIA TREJO as the Successor-  
in-Interest and Surviving Spouse of Rafael  
Trejo, Deceased,

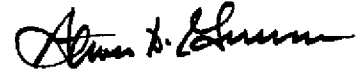
Plaintiff,

vs.

FORD MOTOR COMPANY,

Defendant.

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CLERK OF THE COURT

Case No.: A-11-641059-C

Dept. No.: XXI

**DEFENDANT FORD MOTOR  
COMPANY'S CASE APPEAL  
STATEMENT**

Defendant Ford Motor Company hereby submits the following Case Appeal Statement:

///

1. **Judge issuing the judgment or order appealed from:** Judge Valerie Adair
2. **Name of appellant filing this case appeal statement:** Ford Motor Company
3. **Name and address of counsel for appellant:**

Vaughn A. Crawford  
Jay J. Schuttert  
Morgan T. Petrelli  
Snell & Wilmer L.L.P.  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, NV 89169  
Telephone (702) 784-5200

Michael W. Eady  
Thompson, Coe, Cousins and Irons  
701 Brazos, Suite 1500, Austin Centre  
Austin, TX 78701  
Telephone (512) 703-5084  
(*Pro Hac Vice*)

Lisa Perrochet  
Emily V. Cuatto  
Horvitz & Levy LLP  
15760 Ventura Blvd., 18<sup>th</sup> Floor  
Encino, CA 91436  
Telephone (818) 995-0800  
(*Pro Hav Vice*)

4. **Name of respondent:** Theresa Garcia Trejo, as the successor-in-interest and surviving spouse of Rafael Trejo, deceased.

5. **Name and address of counsel for respondent:**

Larry Lawrence (trial counsel)  
The Lawrence Law Firm  
3112 Windsor Rd.  
Suite A234  
Austin, TX 78703  
(*Pro Hac Vice, see Exhibit 1*)

Ricardo Garcia (trial counsel)  
Jody Mask (trial counsel)  
Garcia Ochoa Mask  
820 South Main St.  
McAllen, TX 78501  
(*Pro Hac Vice, see Exhibit 2*)

William Killip (local counsel)  
Nettles Law Firm  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014

Beau Sterling  
Sterling Law LLC  
228 South 4<sup>th</sup> Street, 1<sup>st</sup> Floor  
Las Vegas, NV 89101

8. **Whether appellant was represented by appointed or retained counsel in the district court, and whether appellant is represented by appointed or retained counsel on appeal:** In the Eighth Judicial District Court action, appellant was represented by retained counsel: the law firm of Snell & Wilmer LLP and the law firm of Thompson, Coe, Cousins and Irons. On appeal, appellant is represented by retained counsel: the law firm of Snell & Wilmer LLP; the law firm of Thompson, Coe, Cousins and Irons; and the law firm of Horvitz & Levy LLP.

8. **Whether appellant was granted leave to proceed *in forma pauperis*, and the date of entry of the district court order granting such leave:** Appellant has not moved for leave to file an appeal *in forma pauperis*.

9. **Date the proceedings commenced in the district court:** The Complaint in this matter was filed with the Eighth Judicial District Court on May 11, 2011.

10. **Brief description of the nature of the action and result:** This is an automotive product liability case arising from a single-vehicle rollover accident that occurred on December 16, 2009, in New Mexico, while Plaintiff Teresa Garcia Trejo was driving a 2000 Ford Excursion. The accident resulted in the death of Mrs. Trejo's husband, Rafael Trejo, who had been sitting in the passenger's seat. Following a two-week jury trial, the jury found the 2000 Ford Excursion's roof was defective in design, and the roof defect proximately caused Mr. Trejo's death. The jury awarded damages in the amount of \$4,500,000.00. The district court subsequently denied Ford's Renewed Motion for Judgment as a Matter of Law or, in the alternative, for New Trial, and awarded Mrs. Trejo \$ 356,703.51 in costs. Ford appeals.

11. **Previous appeal or writ proceeding:** This case has not previously been the subject of an appeal or an original writ proceeding in the Supreme Court or the Court of Appeals.

12. **Child custody:** This appeal does not involve child custody or visitation.

///



1           13.     **Possibility of settlement:** The parties have discussed settlement post-verdict, and  
2 the possibility of settlement is unlikely.

3  
4           DATED this 16 day of April, 2015.

5                               SNELL & WILMER L.L.P.

6  
7           By: 

Vaughn A. Crawford, Nevada Bar No. 7665  
Jay J. Schuttart, Nevada Bar No. 8656  
Morgan T. Petrelli, Nevada Bar No. 13221  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, NV 89169

10                           Michael W. Eady (*Pro Hac Vice*)  
11                           Thompson Coe Cousins & Irons, L.L.P.  
12                           701 Brazos St., 15th Floor  
                             Austin, TX 78701

13                           Lisa Perrochet (*Pro Hac Vice*)  
14                           Emily V. Cuatto (*Pro Hac Vice*)  
15                           Horvitz & Levy LLP  
16                           15760 Ventura Boulevard, 18th Floor  
                             Encino, CA 91436

17                           Attorneys for Defendant  
18                           FORD MOTOR COMPANY  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **DEFENDANT FORD MOTOR COMPANY'S CASE APPEAL STATEMENT** by the method indicated below:

XXXXX Electronic Service (Wiznet)

and addressed to the following:

***Electronic Service (Wiznet)***

Brian D. Nettles, Esq.  
William R. Killip, Jr. Esq.  
NETTLES LAW FIRM  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
Telephone: (702) 434-8282  
Facsimile: (702) 434-1488  
Email: [kathy@nettlawfirm.com](mailto:kathy@nettlawfirm.com)  
Email: [bill@nettlawfirm.com](mailto:bill@nettlawfirm.com)  
Attorneys for Plaintiffs

***Electronic Service (Wiznet – courtesy copy)***

Email: [Ric@gomlaw.com](mailto:Ric@gomlaw.com)  
Email: [Jody@gomlaw.com](mailto:Jody@gomlaw.com)  
Ricardo A. Garcia, Esq. (*Pro Hac Vice*)  
Jody R. Mask, Esq. (*Pro Hac Vice*)  
GARCIA OCHOA MASK  
820 South Main Street  
McAllen, TX 78501  
Telephone: (956) 630-2882  
Facsimile: (956) 630-5393  
Attorneys for Plaintiffs

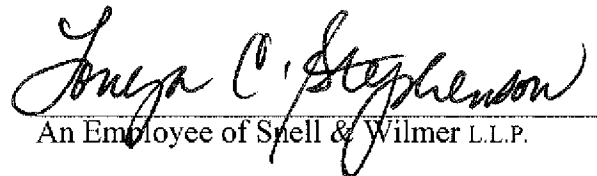
***Electronic Service (Wiznet – courtesy copy)***

Email: [lawrencefirm@aol.com](mailto:lawrencefirm@aol.com)  
Larry Wayne Lawrence, Esq. (*Pro Hac Vice*)  
LAWRENCE LAW FIRM  
3112 Windsor Rd., #A234  
Austin, TX 78703  
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Attorney for Plaintiffs

***Electronic Service (Wiznet)***

Beau Sterling, Esq.  
STERLING LAW, LLC  
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Facsimile: (702) 583-3330  
Email: [bsterling@sterlinglaw.com](mailto:bsterling@sterlinglaw.com)  
Attorneys for Plaintiffs

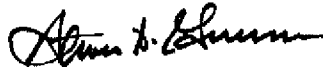
DATED this 16<sup>th</sup> day of April, 2015.

  
An Employee of Snell & Wilmer L.L.P.

20145185.1

# **EXHIBIT 1**

# **EXHIBIT 1**



CLERK OF THE COURT

1 ORDR  
2 BRIAN D. NETTLES, ESQ.  
3 Nevada Bar No. 7462  
4 ERIC L. MARSHALL, ESQ.  
5 Nevada Bar No. 8847  
6 NETTLES LAW FIRM  
7 1389 Galleria Drive, Suite 200  
8 Henderson, Nevada 89014  
9 Telephone: (702) 434-8282  
10 Facsimile: (702) 434-1488

11 Attorneys for Plaintiff

12 **EIGHTH JUDICIAL DISTRICT COURT OF**  
13 **THE STATE OF NEVADA IN AND FOR THE**  
14 **COUNTY OF CLARK**

15 TERESA GARCIA TREJO, Individually and )  
16 As the Successor in Interest and Surviving )  
17 Spouse of Rafael Trejo, Deceased; and JOSE )  
18 DE JESUS GARCIA, Individually. )

19 Plaintiffs, )

20 vs. )

21 ALAN KORANSKY, FORD MOTOR )  
22 COMPANY, DOES 1 through 10, ROE )  
23 CORPORATIONS 11 through 20, inclusive )

24 Defendants. )

Case No.: A-11-641059-C

Dept. No.: XXI

25 **ORDER ADMITTING TO PRACTICE**

26 LARRY WAYNE LAWRENCE, ESQ., having filed his Motion to Associate Counsel  
27 under Nevada Supreme Court Rule 42, together with a Verified Application for Association of  
28 Counsel, a Certificate of Good Standing from the states of Texas, and the State Bar of Nevada  
Statement; said application having been noticed, no objections having been made, and the Court  
being fully apprised in the premises, and good cause appearing, it is hereby ORDERED, that said

**NETTLES LAW FIRM**

1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
702-434-8282 / 702-434-1488 Fax


1 application is hereby granted, and LARRY WAYNE LAWRENCE, ESQ., is hereby admitted to  
2 practice in the above entitled Court for the purposes of the above entitled matter only.

3 DATED this 15<sup>th</sup> day of October, 2013 .

4  
5  
6 Valmuri Adar  
DISTRICT JUDGE *sd*

7 Respectfully submitted:

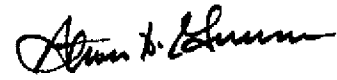
8 NETTLES LAW FIRM

9  
10 By   
11 BRIAN D. NETTLES, ESQ.  
12 Nevada Bar No. 7462  
13 ERIC L. MARSHALL, ESQ.  
14 Nevada Bar No. 8847  
15 1389 Galleria Drive, Suite 200  
16 Henderson, Nevada 89014  
17 Attorneys for Plaintiff  
18  
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# **EXHIBIT 2**

# **EXHIBIT 2**

ORIGINAL

  
CLERK OF THE COURT

**ORDER**

STACEY A. UPSON, ESQ.  
Nevada Bar No. 4773  
NETTLES LAW FIRM  
1389 Galleria Drive, Suite 110  
Henderson, Nevada 89014  
Telephone: (702) 434-8282  
Facsimile: (702) 434-1488  
[staceyupson@nettlawfirm.com](mailto:staceyupson@nettlawfirm.com)  
Attorneys for Plaintiffs

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

TERESA GARCIA TREJO, et al.

Plaintiffs,

vs.

ALAN KORANSKY, FORD MOTOR  
COMPANY, DOES 1 through 10, ROE  
CORPORATIONS 11 through 20, inclusive

Defendants.

Case No.: A-11-641059-C

Dept. No.: XXI

**ORDER GRANTING PLAINTIFFS' MOTION TO ASSOCIATE COUNSEL**

Paul A. Gayton, Esq. and Ricardo A. Garcia, Esq., having filed a Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Application for Association of Counsel, a Certificate of Good Standing for the State of Nevada, and the State Bar of Nevada Statement; said application having been noticed, no objections having been made, and the Court being fully apprised in the premises, and good cause appearing, it is hereby

///

///

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///

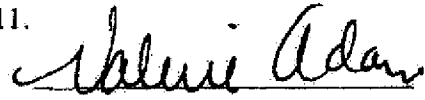
**NETTLES LAW FIRM**

1389 Galleria Drive Suite 110  
Henderson, NV 89014  
(702) 434-8282 / (702) 434-1488 (fax)

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ORDERED that said application is hereby granted and Paul A. Gayton, Esq. and Ricardo A. Garcia, Esq. are hereby admitted to practice in the above-entitled Court for the purposes of the above-entitled matter only.

DATED this 3<sup>rd</sup> day of August 2011.

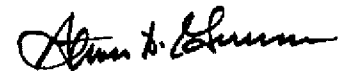


DISTRICT COURT JUDGE, s.



**ORIGINAL**

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CLERK OF THE COURT

**ORD**

BRIAN D. NETTLES, ESQ.

Nevada Bar No. 7462

WILLIAM R. KILLIP, JR, ESQ.

Nevada Bar No. 3660

NETTLES LAW FIRM

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[briannettles@nettleslawfirm.com](mailto:briannettles@nettleslawfirm.com)

[bill@nettleslawfirm.com](mailto:bill@nettleslawfirm.com)

Ricardo A. Garcia, Esq.

LAW OFFICES OF GARCIA & KARAM

820 South Main Street

McAllen, TX 78501

Telephone Number: (956) 630-2882

Facsimile Number: (956) 630-5393

Attorneys for Plaintiffs

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

TERESA GARCIA TREJO, et al.

Plaintiffs,

vs.

ALAN KORANSKY, FORD MOTOR  
COMPANY, DOES 1 through 10, ROE  
CORPORATIONS 11 through 20, inclusive

Defendants.

Case No.: A-11-641059-C

Dept. No.: XXI

**ORDER ADMITTING TO PRACTICE**

JODY R. MASK, ESQ., having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Application of Association of Counsel, a Certificate of Good Standing from the state of Texas and the State Bar of Nevada Statement; said application having been noticed, no objections having been made, and the Court being fully

**NETTLES LAW FIRM**  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
702-434-8282 / 702-434-1488 Fax

**NETTLES LAW FIRM**  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
702-434-8282 / 702-434-1488 Fax

1 appraise in the premises, and good cause appearing, it is hereby ORDERED, that said application  
2 is hereby granted, and JODY R. MASK, ESQ., is hereby admitted to practice in the above  
3 entitled Court for the purposes of the above entitled matter only.  
4 thereto, and having heard the oral arguments of counsel, and having considered the matter and  
5 being fully advised, and good cause appearing therefore:

6 IT IS SO ORDERED this 5<sup>th</sup> day of August, 2014.

7  
8  
9 Valerie Adams  
10 DISTRICT COURT JUDGE

by

11 Respectfully submitted by:  
12 NETTLES LAW FIRM

13  
14 By

BRIAN D. NETTLES, ESQ.

15 Nevada Bar No. 7462

16 WILLIAM R. KILLIP, JR., ESQ.

17 Nevada Bar No. 3660

18 1389 Galleria Drive, Suite 200

19 Henderson, Nevada 89014

20 Telephone: (702) 434-8282

21 Facsimile: (702) 434-1488

22 briannettles@nettlslawfirm.com

23 bill@nettlslawfirm.com

24 Attorneys for Plaintiff  
25  
26  
27  
28

**NPP**

Vaughn A. Crawford, Nevada Bar No. 7665  
Jay J. Schuttart, Nevada Bar No. 8656  
Morgan T. Petrelli, Nevada Bar No. 13221  
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Email: [vcrawford@swlaw.com](mailto:vcrawford@swlaw.com)  
Email: [jschuttart@swlaw.com](mailto:jschuttart@swlaw.com)  
Email: [mpetrelli@swlaw.com](mailto:mpetrelli@swlaw.com)

Michael W. Eady (*Pro Hac Vice*)  
Thompson Coe Cousins & Irons, L.L.P.  
701 Brazos St., 15th Floor  
Austin, TX 78701  
Telephone: (512) 708-8200  
Facsimile: (512) 708-8777  
Email: [MEady@thompsoncoe.com](mailto:MEady@thompsoncoe.com)

Lisa J. Perrochet (*Pro Hac Vice*)  
Emily V. Cuatto (*Pro Hac Vice*)  
Horvitz & Levy LLP  
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Encino, CA 91436  
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Facsimile: (818) 995-3157  
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Email: [ecuatto@horvitzlevy.com](mailto:ecuatto@horvitzlevy.com)

Attorneys for Defendant  
FORD MOTOR COMPANY

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

TERESA GARCIA TREJO as The Success-  
in-Interest and Surviving Spouse of Rafael  
Trejo, Deceased,

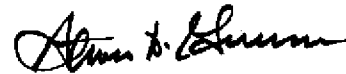
Plaintiff,

vs.

FORD MOTOR COMPANY,

Defendant.

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CLERK OF THE COURT

Case No.: A-11-641059-C

Dept. No.: XXI

**NOTICE OF POSTING SUPERSEDEAS  
BOND AND STAY OF EXECUTION OF  
JUDGMENT**

///

///

1                                   **NOTICE OF POSTING SUPERSEDEAS BOND**  
2                                   **AND STAY OF EXECUTION OF JUDGMENT**

3                   Please take notice that Defendant Ford Motor Company posts its Supersedeas Bond in the  
4                   amount of 8,061,120.32. See Exhibit 1. Pursuant to NRCP 62(d), the attached Supersedeas Bond  
5                   stays execution of the appealed judgment.

6                   DATED this 25 day of March, 2015.

7                                   SNELL & WILMER L.L.P.

8  
9                   By: 

10                   Vaughn A. Crawford  
11                   Nevada Bar No. 7665  
12                   Jay J. Schuttert  
13                   Nevada Bar No. 8656  
14                   Morgan T. Petrelli  
15                   Nevada Bar No. 13221  
16                   3883 Howard Hughes Parkway, Suite 1100  
17                   Las Vegas, NV 89169

18                   Michael W. Eady (*Pro Hac Vice*)  
19                   Thompson Coe Cousins & Irons, L.L.P.  
20                   701 Brazos St., 15th Floor  
21                   Austin, TX 78701

22                   Lisa J. Perrochet (*Pro Hac Vice*)  
23                   Emily V. Cuatto (*Pro Hac Vice*)  
24                   Horvitz & Levy LLP  
25                   15760 Ventura Boulevard, 18th Floor  
26                   Encino, CA 91436

27                   Attorneys for Defendant  
28                   FORD MOTOR COMPANY

Snell & Wilmer

LLP  
LAW OFFICES  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, Nevada 89169  
702.784.5200

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **NOTICE OF POSTING SUPERSEDEAS BOND AND STAY OF EXECUTION OF JUDGMENT** by the method indicated below:

XXXXX Electronic Service (Wiznet)

and addressed to the following:

***Electronic Service (Wiznet)***

Brian D. Nettles, Esq.  
William R. Killip, Jr. Esq.  
NETTLES LAW FIRM  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
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Facsimile: (702) 434-1488  
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Email: [bill@nettleslawfirm.com](mailto:bill@nettleslawfirm.com)  
Attorneys for Plaintiffs

***Electronic Service (Wiznet – courtesy copy)***

Email: [Ric@gomlaw.com](mailto:Ric@gomlaw.com)  
Email: [Jody@gomlaw.com](mailto:Jody@gomlaw.com)  
Ricardo A. Garcia, Esq. (*Pro Hac Vice*)  
Jody R. Mask, Esq. (*Pro Hac Vice*)  
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Telephone: (956) 630-2882  
Facsimile: (956) 630-5393  
Attorneys for Plaintiffs


***Electronic Service (Wiznet – courtesy copy)***

Email: [lawrencefirm@aol.com](mailto:lawrencefirm@aol.com)  
Larry Wayne Lawrence, Esq. (*Pro Hac Vice*)  
LAWRENCE LAW FIRM  
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Attorney for Plaintiffs

***Electronic Service (Wiznet)***

Beau Sterling, Esq.  
STERLING LAW, LLC  
228 South 4th Street, 1st Floor  
Las Vegas, NV 89101  
Telephone: (702) 583-3333  
Facsimile: (702) 583-3330  
Email: [bsterling@sterlinglaw.com](mailto:bsterling@sterlinglaw.com)  
Attorneys for Plaintiffs

DATED this 25<sup>th</sup> day of March, 2015.

  
An Employee of Snell & Wilmer L.L.P.

20145626.1

# **EXHIBIT 1**

# **EXHIBIT 1**

1 Vaughn A. Crawford, Nevada Bar No. 7665  
Jay J. Schutttert, Nevada Bar No. 8656  
2 Morgan T. Petrelli, Nevada Bar No. 13221  
SNELL & WILMER LLP.  
3 3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, NV 89169  
4 Telephone: (702) 784-5200  
Facsimile: (702) 784-5252  
5 Email: [vcrawford@swlaw.com](mailto:vcrawford@swlaw.com)  
Email: [jschutttert@swlaw.com](mailto:jschutttert@swlaw.com)  
6 Email: [mpetrelli@swlaw.com](mailto:mpetrelli@swlaw.com)

7 Michael W. Eady (*Pro Hac Vice*)  
Thompson Coe Cousins & Irons, L.L.P.  
8 701 Brazos St., 15th Floor  
Austin, TX 78701  
9 Telephone: (512) 708-8200  
Facsimile: (512) 708-8777  
10 Email: [MEady@thompsoncoe.com](mailto:MEady@thompsoncoe.com)

11 Lisa J. Perrochet (*Pro Hac Vice*)  
Emily V. Cuatto (*Pro Hac Vice*)  
12 Horvitz & Levy LLP  
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Telephone: (818) 995-0800  
14 Facsimile: (818) 995-3157  
Email: [lperrochet@horvitzlevy.com](mailto:lperrochet@horvitzlevy.com)  
15 Email: [ecuatto@horvitzlevy.com](mailto:ecuatto@horvitzlevy.com)

16 Attorneys for Defendant  
FORD MOTOR COMPANY

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

19 TERESA GARCIA TREJO as The Success-  
20 in-Interest and Surviving Spouse of Rafael  
Trejo, Deceased,

Plaintiff,

vs.

FORD MOTOR COMPANY,

Defendant.

Case No.: A-11-641059-C

Dept. No.: XXI

**SUPERSEDEAS BOND**

**Bond No. 09176453**

26 WHEREAS, in the above-entitled and numbered cause, an Amended Final Judgment was  
27 entered on March 19, 2015 in favor of Plaintiff Teresa Trejo against Defendant Ford Motor  
28 Company. Under the Amended Final Judgment, Ford Motor Company is jointly and severally

1 liable for \$ 5,374,080.21 consisting of actual damages, prejudgment interest, costs and  
2 attorneys' fees, post-judgment interest is fixed on that amount at the rate of 5.25 percent (5.25%)  
3 per annum, compounded annually.

4 WHEREAS, Defendant Ford Motor Company intends to take an appeal from the  
5 Amended Final Judgment to the Nevada Supreme Court;

6 WHEREAS, Defendant Ford Motor Company wishes to suspend enforcement of the  
7 judgment during the appeal; and

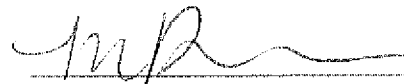
8 WHEREAS, the parties to the judgment have previously stipulated to the posting of a  
9 bond suspending the judgment during the pendency of the appeal in the amount of 1.5 times the  
10 amount of the amended judgment.

11 NOW, THEREFORE, Ford Motor Company, as principal, and Fidelity and Deposit  
12 Company of Maryland a corporation organized under the laws of the State of Maryland and  
13 licensed to transact surety business in the State of Nevada, as surety, acknowledge ourselves  
14 bound to pay the maximum aggregate sum of \$8,061,120.32.

15 Fidelity and Deposit Company of Maryland acknowledges we are bound to pay to  
16 Plaintiff the maximum aggregate sum of \$8,061,120.32, if for any reason the appeal is dismissed  
17 or the judgment is affirmed, and shall satisfy in full any modification of such judgment and such  
18 costs, interest, and damages as the Supreme Court of Nevada may adjudge and award, then this  
19 obligation shall be null and void; otherwise, it shall remain in full force and effect. In no event  
20 will the liability of the surety exceed \$8,061,120.32.

21  
22 Dated: March 25, 2015

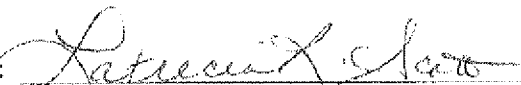
PRINCIPAL: Ford Motor Company

23  
24 

Fidelity and Deposit Company of Maryland

25  
26 Dated: March 23, 2015

SURETY:

27 

Latrecia R. Scott, Attorney-in-Fact  
NV Non-Resident Agent, License #508769

28 20627225.2



## ACKNOWLEDGMENT OF SURETY

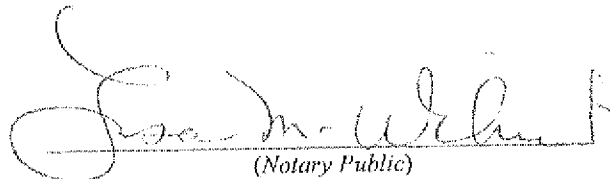
STATE OF MICHIGAN     )  
                                      )  
COUNTY OF OAKLAND    )

On this 23rd day of March 2015, before me personally came Latrechia R. Scott who, being by me duly sworn, did depose and say that she is an Attorney-in-Fact of the Fidelity and Deposit Company of Maryland and knows the corporate seal thereof; that the seal affixed to said annexed instrument is such corporate seal, and was thereto affixed by authority of the Power of Attorney of said Company, of which a Certified Copy is hereto attached, and that she signed said instrument as an Attorney-in-Fact of said Company by like authority.

*Acknowledged and Sworn to before me  
on the date above written*

### My Commission Expires

Lisa M. Wilmot  
Notary Public, Oakland County, Michigan  
My Commission Expires May 22, 2021

  
(Notary Public)

**ZURICH AMERICAN INSURANCE COMPANY  
COLONIAL AMERICAN CASUALTY AND SURETY COMPANY  
FIDELITY AND DEPOSIT COMPANY OF MARYLAND  
POWER OF ATTORNEY**

KNOW ALL MEN BY THESE PRESENTS: That the ZURICH AMERICAN INSURANCE COMPANY, a corporation of the State of New York, the COLONIAL AMERICAN CASUALTY AND SURETY COMPANY, a corporation of the State of Maryland, and the FIDELITY AND DEPOSIT COMPANY OF MARYLAND a corporation of the State of Maryland (herein collectively called the "Companies"), by **GERALD F. HALEY, Vice President**, in pursuance of authority granted by Article V, Section 8, of the By-Laws of said Companies, which are set forth on the reverse side hereof and are hereby certified to be in full force and effect on the date hereof, do hereby nominate, constitute, and appoint **Kathy L. DELGRECO, Lisa M. WILMOT and Latrecia R. SCOTT, all of Southfield, Michigan, EACH** its true and lawful agent and Attorney-in-Fact, to make, execute, seal and deliver, for, and on its behalf as surety, and as its act and deed: **any and all bonds and undertakings**, and the execution of such bonds or undertakings in pursuance of these presents, shall be as binding upon said Companies, as fully and amply, to all intents and purposes, as if they had been duly executed and acknowledged by the regularly elected officers of the ZURICH AMERICAN INSURANCE COMPANY at its office in New York, New York, the regularly elected officers of the COLONIAL AMERICAN CASUALTY AND SURETY COMPANY at its office in Owings Mills, Maryland, and the regularly elected officers of the FIDELITY AND DEPOSIT COMPANY OF MARYLAND at its office in Owings Mills, Maryland, in their own proper persons.

The said Vice President does hereby certify that the extract set forth on the reverse side hereof is a true copy of Article V, Section 8, of the By-Laws of said Companies, and is now in force.

IN WITNESS WHEREOF, the said Vice-President has hereunto subscribed his/her names and affixed the Corporate Seals of the said **ZURICH AMERICAN INSURANCE COMPANY, COLONIAL AMERICAN CASUALTY AND SURETY COMPANY, and FIDELITY AND DEPOSIT COMPANY OF MARYLAND**, this 22nd day of August, A.D. 2014.

ATTEST:

**ZURICH AMERICAN INSURANCE COMPANY  
COLONIAL AMERICAN CASUALTY AND SURETY COMPANY  
FIDELITY AND DEPOSIT COMPANY OF MARYLAND**



By: \_\_\_\_\_

*Secretary*  
*Michael McKibben*

*Vice President*  
*Gerald F. Haley*

State of Maryland  
County of Baltimore

On this 22nd day of August, A.D. 2014, before the subscriber, a Notary Public of the State of Maryland, duly commissioned and qualified, **GERALD F. HALEY, Vice President, and MICHAEL MCKIBBEN, Secretary**, of the Companies, to me personally known to be the individuals and officers described in and who executed the preceding instrument, and acknowledged the execution of same, and being by me duly sworn, deposed and said, that he/she is the said officer of the Company aforesaid, and that the seals affixed to the preceding instrument are the Corporate Seals of said Companies, and that the said Corporate Seals and the signature as such officer were duly affixed and subscribed to the said instrument by the authority and direction of the said Corporations.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my Official Seal the day and year first above written.

*Maria D. Adamski*

Maria D. Adamski, Notary Public  
My Commission Expires: July 8, 2015



## EXTRACT FROM BY-LAWS OF THE COMPANIES

"Article V, Section 8, Attorneys-in-Fact. The Chief Executive Officer, the President, or any Executive Vice President or Vice President may, by written instrument under the attested corporate seal, appoint attorneys-in-fact with authority to execute bonds, policies, recognizances, stipulations, undertakings, or other like instruments on behalf of the Company, and may authorize any officer or any such attorney-in-fact to affix the corporate seal thereto; and may with or without cause modify or revoke any such appointment or authority at any time."

### CERTIFICATE

I, the undersigned, Vice President of the ZURICH AMERICAN INSURANCE COMPANY, the COLONIAL AMERICAN CASUALTY AND SURETY COMPANY, and the FIDELITY AND DEPOSIT COMPANY OF MARYLAND, do hereby certify that the foregoing Power of Attorney is still in full force and effect on the date of this certificate; and I do further certify that Article V, Section 8, of the By-Laws of the Companies is still in force.

This Power of Attorney and Certificate may be signed by facsimile under and by authority of the following resolution of the Board of Directors of the ZURICH AMERICAN INSURANCE COMPANY at a meeting duly called and held on the 15th day of December 1998.

RESOLVED: "That the signature of the President or a Vice President and the attesting signature of a Secretary or an Assistant Secretary and the Seal of the Company may be affixed by facsimile on any Power of Attorney...Any such Power or any certificate thereof bearing such facsimile signature and seal shall be valid and binding on the Company."

This Power of Attorney and Certificate may be signed by facsimile under and by authority of the following resolution of the Board of Directors of the COLONIAL AMERICAN CASUALTY AND SURETY COMPANY at a meeting duly called and held on the 5th day of May, 1994, and the following resolution of the Board of Directors of the FIDELITY AND DEPOSIT COMPANY OF MARYLAND at a meeting duly called and held on the 10th day of May, 1990.

RESOLVED: "That the facsimile or mechanically reproduced seal of the company and facsimile or mechanically reproduced signature of any Vice-President, Secretary, or Assistant Secretary of the Company, whether made heretofore or hereafter, wherever appearing upon a certified copy of any power of attorney issued by the Company, shall be valid and binding upon the Company with the same force and effect as though manually affixed.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed the corporate seals of the said Companies, this 23rd day of March, 2015.



*Thomas O. McClellan*

Thomas O. McClellan, Vice President

DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

**Teresa Trejo, Plaintiff(s)**  
**vs.**  
**Ford Motor Company, Defendant(s)**

§  
§  
§  
§  
§

Location: **Department 21**  
Judicial Officer: **Adair, Valerie**  
Filed on: **05/11/2011**  
Cross-Reference Case Number: **A641059**

CASE INFORMATION

**Statistical Closures**  
10/02/2014 Verdict Reached

Case Type: **Product Liability**  
Subtype: **Product Liability/Motor Vehicle**  
Case Flags: **Appealed to Supreme Court**  
**Jury Demand Filed**  
**Arbitration Exemption Granted**

DATE

CASE ASSIGNMENT

**Current Case Assignment**

Case Number	A-11-641059-C
Court	Department 21
Date Assigned	05/11/2011
Judicial Officer	Adair, Valerie


PARTY INFORMATION

		<i>Lead Attorneys</i>
<b>Plaintiff</b>	<b>Estate of Rafael Trejo</b>	<b>Marshall, Eric L.</b> <i>Retained</i> 7023842495(W)
	<b>Garcia, Jose De Jesus</b> Removed: 09/12/2014 Inactive	<b>Marshall, Eric L.</b> <i>Retained</i> 7023842495(W)
	<b>Trejo, Teresa Garcia</b>	<b>Marshall, Eric L.</b> <i>Retained</i> 7023842495(W)
<b>Defendant</b>	<b>Ford Motor Company</b>	<b>Crawford, Vaughn A.</b> <i>Retained</i> 7027845200(W)
	<b>Koransky, Alan</b> Removed: 09/12/2014 Inactive	<b>Hall, Michael R</b> <i>Retained</i> 7023164111(W)
<b>Other</b>	<b>Clark County Pro Bono Project</b> Removed: 06/24/2013 Inactive	
	<b>Marshall, Eric L, ESQ</b> Removed: 06/24/2013 Inactive	

DATE

EVENTS & ORDERS OF THE COURT

INDEX

05/11/2011	 Complaint Filed By: Plaintiff Trejo, Teresa Garcia <i>Complaint for Damages for Personal Injuries and Wrongful Death and Demand for Jury Trial</i>	
05/11/2011	Case Opened	

DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

07/18/2011	 Affidavit of Service Filed By: Plaintiff Trejo, Teresa Garcia <i>Affidavit of Service</i>
07/18/2011	 Affidavit of Service Filed By: Plaintiff Trejo, Teresa Garcia <i>Affidavit of Service</i>
07/28/2011	 Ex Parte Petition Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiff's Ex-Parte Petition for Leave to File Motion to Associate Counsel on Order Shortening Time</i>
07/29/2011	 Initial Appearance Fee Disclosure Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Initial Appearance Fee Disclosure</i>
07/29/2011	 Motion to Dismiss Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Motion to Dismiss Plaintiffs' Claims for Punitive Damages</i>
07/29/2011	 Demand for Jury Trial Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Demand for Jury Trial</i>
08/01/2011	 <b>Motion to Associate Counsel</b> (3:00 AM) (Judicial Officer: Adair, Valerie) Events: 07/28/2011 Ex Parte Petition <i>Plaintiff's Ex-Parte Petition for Leave to File Motion to Associate Counsel</i>
08/04/2011	 Order Granting Motion Filed By: Plaintiff Trejo, Teresa Garcia <i>Order Granting Plaintiffs' Motion to Associate Counsel - Paul A Gaytan Esq</i>
08/08/2011	 Notice of Entry Filed By: Plaintiff Trejo, Teresa Garcia <i>Notice of Entry of Order Granting Plaintiff's Motion to Associate Counsel</i>
08/08/2011	 Certificate of Service Filed by: Plaintiff Trejo, Teresa Garcia <i>Certificate of Service</i>
08/12/2011	 Initial Appearance Fee Disclosure Filed By: Defendant Koransky, Alan <i>Initial Appearance Fee Disclosure (NRS Chapter 19)</i>
08/12/2011	 Motion for More Definite Statement Filed By: Defendant Koransky, Alan <i>Defendant Alan Koransky's NRCP 12(3) Motion for More Definite Statement</i>
08/16/2011	 Demand for Jury Trial Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Demand for Jury Trial</i>
08/16/2011	 Opposition

# CASE SUMMARY

## CASE NO. A-11-641059-C

Filed By: Plaintiff Trejo, Teresa Garcia  
*Plaintiffs' Opposition to Defendant Ford Motor Company's Motion to Dismiss Plaintiffs' Claims for Punitive Damages*

08/24/2011



Reply in Support

Filed By: Defendant Ford Motor Company  
*Defendant Ford Motor Company's Reply in Support of Motion to Dismiss Plaintiffs' Claims for Punitive Damages*

08/31/2011

**Motion to Dismiss** (9:30 AM) (Judicial Officer: Adair, Valerie)

Events: 07/29/2011 Motion to Dismiss  
*Defendant Ford Motor Company's Motion to Dismiss Plaintiffs' Claims for Punitive Damages*

09/09/2011



Order Denying Motion

Filed By: Defendant Ford Motor Company  
*Order Denying Defendant Ford Motor Company's Motion to Dismiss Plaintiffs' Claim for Punitive Damages*

09/12/2011

**Motion for More Definite Statement** (3:00 AM) (Judicial Officer: Adair, Valerie)

*Defendant Alan Koransky's NRCP 12(3) Motion for More Definite Statement*

09/12/2011



Stipulation and Order

Filed by: Plaintiff Trejo, Teresa Garcia  
*Stipulation and Order Regarding Punitive Damages*

09/12/2011



Notice of Entry of Order

Filed By: Defendant Ford Motor Company  
*Notice of Entry of Order Denying Defendant Ford Motor Company's Motion to Dismiss Plaintiffs' Claim for Punitive Damages*

09/14/2011



Notice of Entry of Stipulation and Order

Filed By: Plaintiff Trejo, Teresa Garcia  
*Notice of Entry of Stipulation and Order regarding Punitive Damage*

09/26/2011



Answer to Complaint

Filed by: Defendant Ford Motor Company  
*Defendant Ford Motor Company's Answer To Plaintiffs' Complaint*

09/30/2011



Answer

Filed By: Defendant Koransky, Alan  
*Defendant Alan Koransky's Answer to Plaintiffs' Complaint*

10/24/2011



Commissioners Decision on Request for Exemption - Granted

Party: Plaintiff Trejo, Teresa Garcia  
*Commissioner s Decision on Request for Exemption*

10/24/2011



Notice

Filed By: Plaintiff Trejo, Teresa Garcia  
*Notice of Change of Lead Counsel*

11/07/2011



Notice of Early Case Conference

Filed By: Plaintiff Trejo, Teresa Garcia  
*Notice of Early Case Conference*

12/13/2011

DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

	 Notice of Rescheduling Filed By: Plaintiff Trejo, Teresa Garcia <i>Notice of Rescheduled Early Case Conference</i>
02/06/2012	 Joint Case Conference Report Filed By: Plaintiff Trejo, Teresa Garcia <i>Joint Case Conference Report</i>
02/13/2012	 Scheduling Order <i>Scheduling Order</i>
02/21/2012	 Order Setting Civil Jury Trial <i>Order Setting Civil Jury Trial</i>
07/23/2012	 Application for Issuance of Commission to Take Deposition Party: Defendant Ford Motor Company <i>Application to Issue Commission to Serve Subpoena Duces Tecum Outside Nevada Upon Byrd's R&amp;M Repairs &amp; Towing</i>
09/12/2012	 Notice of Change of Address Filed By: Defendant Koransky, Alan <i>Notice of Change of Address</i>
10/17/2012	 Stipulated Protective Order Filed By: Defendant Ford Motor Company <i>Stipulated Sharing and Non-Sharing Protective Order</i>
10/18/2012	 Notice of Entry of Order Filed By: Defendant Ford Motor Company <i>Notice of Entry of Stipulated Sharing and Non-Sharing Protective Order</i>
01/02/2013	 Motion to Compel Filed By: Defendant Koransky, Alan <i>Defendant Alan Koransky's Motion to Compel Responses from Plaintiff Jose de Jesus Garcia to First Set of Interrogatories and Request for Production of Documents, and for Sanctions</i>
01/03/2013	 Notice of Hearing Filed By: Defendant Koransky, Alan <i>Notice of Hearing for Defendant Alan Koransky's Motion to Compel Responses from Plaintiff Jose de Jesus Garcia to First Set of Interrogatories and Request for Production of Documents, and for Sanctions</i>
01/14/2013	 Application for Issuance of Commission to Take Deposition Party: Defendant Ford Motor Company <i>Application to Issue Commission to Serve Subpoena Duces Tecum Outside Nevada Upon University Medical Center - El Paso</i>
01/14/2013	 Application for Issuance of Commission to Take Deposition Party: Defendant Ford Motor Company <i>Application to Issue Commission to Serve Subpoena Duces Tecum Outside Nevada Upon Memorial Medical Center - Las Cruces</i>
01/14/2013	 Application for Issuance of Commission to Take Deposition Party: Defendant Ford Motor Company <i>Application to Issue Commission to Serve Subpoena Duces Tecum Outside Nevada Upon New</i>











DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

*Mexico State Police*

01/31/2013	 Opposition to Motion to Compel Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiff's Opposition to Defendant Alan Koransky's Motion to Compel and for Sanctions</i>
02/04/2013	 <b>Motion to Compel</b> (1:30 PM) (Judicial Officer: Beecroft, Chris A, Jr.) <i>Defendant Alan Koransky's Motion to Compel Responses from Plaintiff Jose de Jesus Garcia to First Set of Interrogatories and Request for Production of Documents, and for Sanctions</i>
03/04/2013	 <b>Status Check: Compliance/Sanctions</b> (2:00 PM) (Judicial Officer: Beecroft, Chris A, Jr.)
03/12/2013	 Stipulation to Extend Discovery Party: Plaintiff Trejo, Teresa Garcia <i>Stipulation and Order to Extend Discovery Deadlines (First Request)</i>
03/13/2013	 Notice of Entry of Stipulation and Order Filed By: Plaintiff Trejo, Teresa Garcia <i>Notice of Entry of Order</i>
03/28/2013	 Notice of Entry of Order Filed By: Plaintiff Trejo, Teresa Garcia <i>Notice of Entry of Stipulation and Order to Extend Discovery Deadlines</i>
03/29/2013	 Application for Issuance of Commission to Take Deposition Party: Defendant Ford Motor Company <i>Application to Issue Commission to Serve Subpoena to Appear for Deposition Outside Nevada Upon Officer Pat Kuchma, ID No. 101241 (Retired)</i>
03/29/2013	 Application for Issuance of Commission to Take Deposition Party: Defendant Ford Motor Company <i>Application to Issue Commission to Serve Subpoena to Appear for Deposition Outside Nevada Upon Sergeant Ron Taylor</i>
03/29/2013	 Application for Issuance of Commission to Take Deposition Party: Defendant Ford Motor Company <i>Application to Issue Commission to Serve Subpoena to Appear for Deposition Outside Nevada Upon Officer Raul T. Martinez, ID No. 117027 (Retired)</i>
04/02/2013	 Order Shortening Time Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiff's Motion to Extend Discovery on an Order Shortening Time (Second Request)</i>
04/05/2013	 Opposition to Motion Filed By: Defendant Ford Motor Company <i>Ford Motor Company's Opposition to Plaintiffs' Motion to Extend Discovery on an Order Shortening Time (second request)</i>
04/08/2013	 Application for Issuance of Commission to Take Deposition Party: Defendant Ford Motor Company <i>Application to Issue Commission to Serve Subpoena to Appear for Deposition Outside Nevada Upon Sergeant Ron Taylor</i>
04/08/2013	 Application for Issuance of Commission to Take Deposition



DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

	Party: Defendant Ford Motor Company <i>Application to Issue Commission to Serve Subpoena to Appear for Deposition Outside Nevada Upon Officer Pat Kuchma, ID No. 101241 (Retired)</i>
04/08/2013	 Application for Issuance of Commission to Take Deposition Party: Defendant Ford Motor Company <i>Application to Issue Commission to Serve Subpoena to Appear for Deposition Outside Nevada Upon Officer Raul T. Martinez, IN Do. 117027 (Retired)</i>
04/08/2013	 <b>Motion to Extend Discovery</b> (1:30 PM) (Judicial Officer: Beecroft, Chris A, Jr.) Events: 04/02/2013 Order Shortening Time <i>Plaintiff's Motion to Extend Discovery on an Order Shortening Time (Second Request)</i>
04/08/2013	<b>CANCELED Status Check: Compliance</b> (2:00 PM) (Judicial Officer: Beecroft, Chris A, Jr.) <i>Vacated - per Commissioner</i>
04/16/2013	 Discovery Commissioners Report and Recommendations Filed By: Defendant Koransky, Alan <i>Discovery Commissioners Report and Recommendations Re Defendant Alan Koransky's Motion to Compel Responses From Plaintiff Jose De Jesus Garcia to First Set of Interrogatories and Request for Production of Documents, and for Sanctions</i>
04/29/2013	 <b>Status Check: Compliance/Sanctions</b> (2:00 PM) (Judicial Officer: Beecroft, Chris A, Jr.)
04/29/2013	 Stipulation and Order to Extend Discovery Deadlines Filed By: Defendant Ford Motor Company <i>Stipulation and Order for Extension of Time to Complete Discovery (Third Request)</i>
04/30/2013	 Notice of Entry of Stipulation and Order Filed By: Defendant Ford Motor Company <i>Notice of Entry of Stipulation and Order for Extension of Time to Complete Discovery (Third Request)</i>
05/01/2013	 Stipulation and Order for Dismissal With Prejudice Filed By: Defendant Ford Motor Company <i>Stipulation and Order to Dismiss Punitive Damages with Prejudice</i>
05/01/2013	<b>Order of Dismissal With Prejudice</b> (Judicial Officer: Adair, Valerie) Debtors: Teresa Garcia Trejo (Plaintiff), Estate of Rafael Trejo (Plaintiff), Jose De Jesus Garcia (Plaintiff) Creditors: Alan Koransky (Defendant), Ford Motor Company (Defendant) Judgment: 05/01/2013, Docketed: 05/08/2013 Comment: Certain Claim
05/02/2013	 Notice of Entry of Stipulation & Order for Dismissal Filed By: Defendant Ford Motor Company <i>Notice of Entry of Stipulation and Order to Dismiss Punitive Damages with Prejudice</i>
05/29/2013	 Discovery Commissioners Report and Recommendations Filed By: Plaintiff Trejo, Teresa Garcia <i>Discovery Commissioner's Report and Recommendations</i>
06/03/2013	<b>CANCELED Status Check: Compliance</b> (2:00 PM) (Judicial Officer: Bulla, Bonnie) <i>Vacated - per Commissioner</i>
06/10/2013	 Expert Witness Designation

DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

	Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Disclosures of Expert Witnesses and Reports Pursuant to Nev.R Civ. P. 16(a) (2)</i>
06/24/2013	 Discovery Commissioners Report and Recommendations Filed By: Plaintiff Trejo, Teresa Garcia; Plaintiff Estate of Rafael Trejo; Plaintiff Garcia, Jose De Jesus
06/24/2013	<b>Sanctions</b> (Judicial Officer: Adair, Valerie) Debtors: Eric L Marshall, ESQ. (Other) Creditors: Clark County Pro Bono Project (Other) Judgment: 06/24/2013, Docketed: 07/01/2013 Total Judgment: 250.00
07/01/2013	 Motion Filed By: Defendant Ford Motor Company <i>Joint Motion for Firm Trial Setting on an Order Shortening Time</i>
07/10/2013	 <b>Motion to Set Trial Date</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Joint Motion for Firm Trial Setting on OST</i>
08/02/2013	 Stipulation and Order Filed by: Defendant Ford Motor Company <i>Stipulation and Order for Extension of Time to Complete Discovery (Fourth Request)</i>
08/02/2013	 Notice of Entry of Stipulation and Order Filed By: Defendant Ford Motor Company <i>Notice of Entry of Stipulation and Order for Extension of Time to Complete Discovery (Fourth Request)</i>
09/06/2013	 Motion Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs Motion to Associate Counsel</i>
10/07/2013	 <b>Motion to Associate Counsel</b> (3:00 AM) (Judicial Officer: Adair, Valerie) Events: 09/06/2013 Motion <i>Plaintiffs' Motion to Associate Counsel</i>
10/23/2013	 Stipulation and Order Filed by: Defendant Ford Motor Company <i>Stipulation and Order</i>
10/24/2013	 Notice of Entry of Stipulation and Order Filed By: Defendant Ford Motor Company <i>Notice of Entry of Stipulation and Order</i>
11/08/2013	 Order Admitting to Practice Filed By: Plaintiff Trejo, Teresa Garcia <i>Order Admitting to Practice</i>
11/27/2013	 Notice of Entry of Order Filed By: Plaintiff Trejo, Teresa Garcia <i>Notice of Entry of Order Admitting to Practice</i>
12/13/2013	 Motion for Summary Judgment Filed By: Defendant Koransky, Alan

DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

*Defendant Alan Koransky's Motion for Summary Judgment*

12/13/2013	 Appendix Filed By: Defendant Koransky, Alan <i>Appendix of Documents for Defendant Alan Koransky's Motion for Summary Judgment</i>
12/16/2013	 Notice of Hearing Filed By: Defendant Koransky, Alan <i>Notice of Hearing for Defendant Alan Koransky's Motion for Summary Judgment</i>
01/07/2014	 Motion to Continue Trial Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Motion to Continue Trial on an Order Shortening Time</i>
01/09/2014	 Non Opposition Filed By: Defendant Koransky, Alan <i>Notice of Non-Opposition to Defendant Alan Koransky's Motion for Summary Judgment</i>
01/09/2014	 Non Opposition Filed By: Plaintiff Trejo, Teresa Garcia <i>Non-Opposition to Defendant Ford Motor Company's Motion to Continue Trial Date on an Order Shortening Time</i>
01/15/2014	<b>Motion for Summary Judgment</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Defendant Alan Koransky's Motion for Summary Judgment</i>
01/15/2014	<b>Motion to Continue Trial</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Ford Motor Company's Motion to Continue Trial on OST</i>
01/15/2014	 <b>All Pending Motions</b> (9:30 AM) (Judicial Officer: Adair, Valerie)
01/24/2014	 Order Filed By: Defendant Koransky, Alan <i>Order and Judgment Pursuant to EDCR 2.23(b)</i>
01/24/2014	<b>Summary Judgment</b> (Judicial Officer: Adair, Valerie) Debtors: Teresa Garcia Trejo (Plaintiff), Estate of Rafael Trejo (Plaintiff), Jose De Jesus Garcia (Plaintiff) Creditors: Alan Koransky (Defendant) Judgment: 01/24/2014, Docketed: 01/31/2014
01/24/2014	<b>Order of Dismissal With Prejudice</b> (Judicial Officer: Adair, Valerie) Debtors: Teresa Garcia Trejo (Plaintiff), Estate of Rafael Trejo (Plaintiff), Jose De Jesus Garcia (Plaintiff) Creditors: Alan Koransky (Defendant) Judgment: 01/24/2014, Docketed: 01/31/2014
01/28/2014	 Notice of Entry of Order Filed By: Defendant Koransky, Alan <i>Notice of Entry of Order and Judgment Pursuant to EDCR 2.23(b)</i>
02/04/2014	 Memorandum of Costs and Disbursements Filed By: Defendant Koransky, Alan <i>Defendant Alan Koransky's Verified Memorandum of Costs</i>
02/04/2014	

DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

	 Motion for Costs Filed By: Defendant Koransky, Alan <i>Defendant Alan Koransky's Motion for Costs</i>
02/05/2014	 Notice of Hearing Filed By: Defendant Koransky, Alan <i>Notice of Hearing for Defendant Alan Koransky's Motion for Costs</i>
02/10/2014	<b>CANCELED Calendar Call (9:00 AM) (Judicial Officer: Adair, Valerie)</b> <i>Vacated - per Judge</i>
02/24/2014	 Opposition to Motion Filed By: Plaintiff Trejo, Teresa Garcia <i>Opposition to Defendant Alan Koransky's Motion for Costs</i>
02/24/2014	<b>CANCELED Jury Trial - FIRM (9:30 AM) (Judicial Officer: Adair, Valerie)</b> <i>Vacated - per Judge</i>
02/28/2014	 Reply in Support Filed By: Defendant Koransky, Alan <i>Defendant Alan Koransky's Reply in Support of Motion for Costs</i>
03/10/2014	 <b>Motion for Costs (3:00 AM) (Judicial Officer: Adair, Valerie)</b> <i>Defendant Alan Koransky's Motion for Costs</i>
04/24/2014	 Order Granting Filed By: Defendant Koransky, Alan <i>Order Granting Costs in Favor of Alan Koransky</i>
04/24/2014	 Notice of Entry of Order Filed By: Defendant Koransky, Alan <i>Notice of Entry of Order Granting Costs in Favor of Alan Koransky</i>
04/24/2014	<b>Order (Judicial Officer: Adair, Valerie)</b> Debtors: Teresa Garcia Trejo (Plaintiff), Jose De Jesus Garcia (Plaintiff) Creditors: Alan Koransky (Defendant) Judgment: 04/24/2014, Docketed: 05/01/2014 Total Judgment: 25,648.61
04/25/2014	 Order Setting Civil Jury Trial <i>Amended Order Setting Civil Jury Trial</i>
07/14/2014	 Motion for Order Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Motion to Submit Juror Questionnaire to Prospective Jurors on Order Shortening Time</i>
07/16/2014	 Disclosure of Documents and Witnesses Pursuant to NRCP 16.1 Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Fourth Supplement To Early Case Conference Initial Disclosures Pursuant to N.R.C.P. 16.1 and List of Witnesses and Trial Exhibits</i>
07/21/2014	 Pre-Trial Disclosure Party: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Fifth Supplement to Early Case Conference Initial Disclosures Pursuant to N.R.C.P.</i>

DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

*16.1 and List of Witnesses and Trial Exhibits*

07/25/2014	 Motion in Limine Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Motion In Limine to Exclude Evidence and Argument of Teresa Garcia Trejo's Negligence</i>
07/25/2014	 Motion in Limine Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Motion In Limine to Exclude Evidence, Defense Argument, or Reference to Dissimilar Tests on Dissimilar Vehicles</i>
07/25/2014	 Motion in Limine Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Motion In Limine to Exclude Reference to the "Controlled Rollover Impact System (CRIS)" Testing, Including Videos and Conclusions</i>
07/25/2014	 Motion in Limine Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Motion In Limine to Exclude Opinions of Todd Hoover &amp; Jeff Croteau</i>
07/25/2014	 Motion in Limine Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Motion In Limine Challenging Ford Expert Jeff Croteau's "Expert" Testimony Regarding Statistics</i>
07/25/2014	 Motion in Limine Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Motion in Limine to Exclude References to Volvo, Ford's Ownership of Volvo, and other Vehicles Including the Volvo XC90 [Motion No. 1]</i>
07/25/2014	 Motion in Limine Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Motion in Limine to Exclude Evidence of the Weaver Memo [Motion No. 2]</i>
07/25/2014	 Motion in Limine Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Motion in Limine to Exclude Evidence of Other Accidents, Incidents, Complaints, or Lawsuit [Motion No. 3]</i>
07/25/2014	 Motion in Limine Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Motion in Limine to Exclude Evidence of Drop Tests [Motion No. 4]</i>
07/25/2014	 Motion in Limine Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Motion in Limine to Exclude Any Reference to Alleged Seatbelt Defects or Criticisms [Motion No. 5]</i>
07/25/2014	 Motion in Limine Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Motion in Limine to Exclude Reference to the Insurance Institute of Highway Safety's Testing and Ratings [Motion No. 6]</i>

DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**


07/25/2014	 Motion in Limine Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Motion in Limine to Exclude Evidence of Theoretical Application of FMVSS 216 [Motion No. 7]</i>
07/25/2014	 Motion to Exclude Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Motion to Exclude Plaintiffs' Expert Brian Herbst [Motion No. 8]</i>
07/28/2014	 Notice of Change of Hearing
07/30/2014	 <b>Motion</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Defendant Ford Motor Company's Motion to Submit Juror Questionnaire to Prospective Jurors</i>
07/31/2014	 Pre-Trial Disclosure Party: Plaintiff Trejo, Teresa Garcia <i>Plaintiff's Sixth Supplement to Early Case Conference Initial Disclosures Pursuant to NRCP 16.1 and List of Witnesses and Trial Exhibits</i>
08/01/2014	 Pre-Trial Disclosure Party: Plaintiff Trejo, Teresa Garcia <i>Plaintiff's Seventh Supplement to Early Case Conference Initial Disclosures Pursuant to NRCP 16.1 and List of Witnesses and Trial Exhibits</i>
08/06/2014	 Order Granting Motion Filed By: Defendant Ford Motor Company <i>Order Granting Defendant Ford Motor Company's Motion to Submit Juror Questionnaire to Prospective Jurors</i>
08/06/2014	 Motion Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Motion to Limit the Testimony of Dr. Ross Zumwalt on an Order Shortening Time</i>
08/06/2014	 Motion to Exclude Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Motion to Exclude Plaintiffs' Experts' Untimely New Opinions on an Order Shortening Time</i>
08/07/2014	 Opposition to Motion in Limine Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Opposition to Defendant Ford Motor Company's Motions In Limine to Exclude Plaintiff's Expert Brian Herbst [Motion No. 8] and to Exclude Evidence of Drop Tests [Motion No. 4]</i>
08/07/2014	 Notice of Entry of Order Filed By: Defendant Ford Motor Company <i>Notice of Entry of Order Granting Defendant Ford Motor Company's Motion to Submit Juror Questionnaire to Prospective Jurors</i>
08/07/2014	 Opposition to Motion in Limine Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Opposition to Defendant Ford Motor Company's Motion In Limine to Exclude References to Volvo, Ford's Ownership of Volvo, and Other Vehicles Including the Volvo</i>

DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

*XC90 [Motion No. 1]*

08/07/2014	 Opposition to Motion in Limine Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Opposition to Defendant Ford Motor Company's Motion In Limine to Exclude Evidence of the Weaver Memo [Motion No. 2]</i>
08/07/2014	 Opposition to Motion in Limine Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Opposition to Defendant Ford Motor Company's Motion In Limine to Exclude Reference to Seatbelt Defects or Criticisms [Motion No. 5]</i>
08/07/2014	 Opposition to Motion in Limine Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Opposition to Defendant Ford Motor Company's Motion In Limine to Exclude Theoretical Application of FMVSS216 [Motion No. 7]</i>
08/08/2014	 Pre-Trial Disclosure Party: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Eighth Supplement to Early Case Conference Initial Disclosures Pursuant to N.R.C.P. 16.1 and List of Witnesses and Trial Exhibits</i>
08/08/2014	 Pre-Trial Disclosure Party: Plaintiff Trejo, Teresa Garcia <i>Plaintiff's NRCP 16.1(a)(3) Pre-Trial Disclosures</i>
08/11/2014	 Opposition to Motion in Limine Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Opposition to Defendant Ford Motor Company's Motion in Limine to Exclude Evidence of Other Accidents, Incidents, Complaints, or Lawsuits [Motion No. 3]</i>
08/11/2014	 Opposition to Motion in Limine Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Opposition to Defendant Ford Motor Company's Motion In Limine to Exclude Reference to the Insurance Institute of Highway Safety's Testing and Ratings [Motion No. 6]</i>
08/11/2014	 Opposition to Motion in Limine Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Opposition to Plaintiffs' Motion in Limine to Exclude Evidence, Defense Argument, or Reference to Dissimilar Tests on Dissimilar Vehicles</i>
08/11/2014	 Opposition to Motion in Limine Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Opposition to Plaintiffs' Motion in Limine to Exclude Reference to the "Controlled Rollover Impact System (CRIS)" Testing, Including Videos and Conclusions</i>
08/11/2014	 Opposition to Motion in Limine Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Opposition to Plaintiffs' Motion in Limine Challenging Ford Expert Jeff Croteau's "Expert" Testimony Regarding Statistics</i>
08/11/2014	 Opposition to Motion in Limine Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Opposition to Plaintiffs' Motion in Limine to Exclude Evidence and Argument of Teresa Garcia Trejo's Negligence</i>

DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

08/11/2014	 Opposition to Motion in Limine Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Opposition to Plaintiffs' Motion in Limine to Exclude Opinions of Todd Hoover and Jeff Croteau</i>
08/11/2014	 Opposition to Motion Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Opposition to Defendant Ford Motor Company's Motions to Exclude Plaintiffs' Experts' Untimely New Opinions and To Limit The Testimony of Dr. Ross Zumwalt On An Order Shortening Time</i>
08/12/2014	 Notice Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Notice of Manual Filing</i>
08/22/2014	 Stipulation and Order Filed by: Defendant Ford Motor Company <i>Stipulation and Order</i>
08/22/2014	 Notice of Entry of Stipulation and Order Filed By: Defendant Ford Motor Company <i>Notice of Entry of Stipulation and Order</i>
08/22/2014	 Pre-trial Memorandum Filed by: Defendant Ford Motor Company <i>Joint Pre-Trial Memorandum</i>
08/25/2014	 <b>Calendar Call</b> (9:00 AM) (Judicial Officer: Adair, Valerie)
08/26/2014	 Reply to Opposition Filed by: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Reply to Defendant Ford Motor Company's Opposition to Motion In Limine to Exclude Opinions by Todd Hoover and Jeff Croteau</i>
08/27/2014	 Reply in Support Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Reply in Support of Motion in Limine to Exclude Plaintiff's Expert Brian Herbst [Motion No. 8] and Motion in Limine to Exclude Evidence of Drop Tests [Motion No. 4]</i>
08/27/2014	 Reply in Support Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Reply in Support of Motion to Exclude Plaintiff's Experts' Untimely New Opinions</i>
08/27/2014	 Reply in Support Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Reply in Support of Motion to Exclude Evidence of Theoretical Application of FMVSS 216 [Motion No. 7]</i>
08/27/2014	 Reply in Support Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Reply in Support of Motion to Limit the Testimony of Dr. Ross Zumwalt</i>









DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

08/28/2014	 Motion Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiff's Motion to Exclude Untimely Disclosures On An Order Shortening Time</i>
08/28/2014	 Motion Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiff's Motion to Associate Counsel On An Order Shortening Time</i>
08/29/2014	 Opposition to Motion Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Opposition to Plaintiff's Motion to Exclude Untimely Disclosures on an Order Shortening Time</i>
08/29/2014	 Brief Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Trial Brief</i>
09/02/2014	 Motion to Associate Counsel Filed By: Defendant Ford Motor Company <i>Motion to Associate Counsel on an Order Shortening Time</i>
09/03/2014	 Order Admitting to Practice Filed By: Defendant Ford Motor Company <i>Order Admitting to Practice</i>
09/03/2014	<b>Motion in Limine</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Defendant Ford Motor Company's Motion in Limine to Exclude References to Volvo, Ford's Ownership of Volvo, and other Vehicles Including the Volvo XC90 [Motion No. 1]</i>
09/03/2014	<b>Motion in Limine</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Defendant Ford Motor Company's Motion in Limine to Exclude Evidence of the Weaver Memo [Motion No. 2]</i>
09/03/2014	<b>Motion in Limine</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Defendant Ford Motor Company's Motion in Limine to Exclude Evidence of Other Accidents, Incidents, Complaints, or Lawsuit [Motion No. 3]</i>
09/03/2014	<b>Motion in Limine</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Defendant Ford Motor Company's Motion in Limine to Exclude Evidence of Drop Tests [Motion No. 4]</i>
09/03/2014	<b>Motion in Limine</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Defendant Ford Motor Company's Motion in Limine to Exclude Any Reference to Alleged Seatbelt Defects or Criticisms [Motion No. 5]</i>
09/03/2014	<b>Motion in Limine</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Defendant Ford Motor Company's Motion in Limine to Exclude Reference to the Insurance Institute of Highway Safety's Testing and Ratings [Motion No. 6]</i>
09/03/2014	<b>Motion in Limine</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Defendant Ford Motor Company's Motion in Limine to Exclude Evidence of Theoretical Application of FMVSS 216 [Motion No. 7]</i>
09/03/2014	<b>Motion to Exclude</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Defendant Ford Motor Company's Motion to Exclude Plaintiffs' Expert Brian Herbst [Motion No. 8]</i>

DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**















09/03/2014	<b>Motion in Limine</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Plaintiffs' Motion In Limine to Exclude Evidence and Argument of Teresa Garcia Trejo's Negligence</i>
09/03/2014	<b>Motion in Limine</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Plaintiffs' Motion In Limine to Exclude Evidence, Defense Argument, or Reference to Dissimilar Tests on Dissimilar Vehicles</i>
09/03/2014	<b>Motion in Limine</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Plaintiffs' Motion In Limine to Exclude Reference to the "Controlled Rollover Impact System (CRIS)" Testing, Including Videos and Conclusions</i>
09/03/2014	<b>Motion in Limine</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Plaintiffs' Motion In Limine to Exclude Opinions of Todd Hoover &amp; Jeff Croteau</i>
09/03/2014	<b>Motion in Limine</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Plaintiffs' Motion In Limine Challenging Ford Expert Jeff Croteau's "Expert" Testimony Regarding Statistics</i>
09/03/2014	<b>Motion</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Defendant Ford Motor Company's Motion to Limit the Testimony of Dr. Ross Zumwalt on OST</i>
09/03/2014	<b>Motion</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Defendant Ford Motor Company's Motion to Exclude Plaintiffs' Experts' Untimely New Opinions on OST</i>
09/03/2014	<b>Motion to Associate Counsel</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Plaintiff's Motion to Associate Counsel on OST</i>
09/03/2014	<b>Motion to Exclude</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Plaintiff's Motion to Exclude Untimely Disclosures on OST</i>
09/03/2014	<b>Motion to Associate Counsel</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Motion to Associate Counsel</i>
09/03/2014	 <b>All Pending Motions</b> (9:30 AM) (Judicial Officer: Adair, Valerie)
09/04/2014	 Reporters Transcript <i>Motions, Wednesday, September 3, 2014</i>
09/04/2014	 Notice of Entry of Order Filed By: Defendant Ford Motor Company <i>Notice of Entry of Order Admitting to Practice</i>
09/08/2014	 <b>Jury Trial - FIRM</b> (9:00 AM) (Judicial Officer: Adair, Valerie) <b>09/08/2014-09/12/2014, 09/15/2014-09/19/2014, 09/22/2014-09/23/2014</b>
09/08/2014	 Jury List
09/09/2014	 Media Request and Order Party: Plaintiff Estate of Rafael Trejo <i>Media Request And Order Allowing Camera Access To Court Proceedings</i>
09/09/2014	 Opposition to Motion to Compel Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Opposition to Plaintiff's Motion to Compel and Motion for Sanctions</i>

DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

09/10/2014	 Order Admitting to Practice Filed By: Plaintiff Trejo, Teresa Garcia <i>Order Admitting to Practice</i>
09/10/2014	 Reporters Transcript <i>Transcript of Proceedings Jury Trial - Day 2, Tuesday, September 9, 2014</i>
09/11/2014	 Reporters Transcript <i>Jury Trial - Day 3, Wednesday, September 10, 2014</i>
09/12/2014	 Reporters Transcript Filed By: Plaintiff Trejo, Teresa Garcia <i>Jury Trial - Day 4, Thursday, September 11, 2014</i>
09/12/2014	 Notice of Entry of Stipulation and Order Filed By: Defendant Ford Motor Company <i>Notice of Entry of Stipulation and Order Dismissing Plaintiffs Teresa Garcia Trejo and Jose De Jesus Garcia's Personal Physical Injury Claims Against Ford Motor Company</i>
09/12/2014	 Notice of Entry of Order Filed By: Plaintiff Trejo, Teresa Garcia <i>Notice of Entry of Order</i>
09/12/2014	 Stipulation and Order for Dismissal With Prejudice Filed By: Defendant Ford Motor Company <i>Stipulation and Order Dismissing Plaintiffs Teresa Garcia Trejo and Jose de Jesus Garcia's Personal Physical Injury Claims Against Defendant Ford Motor Company</i>
09/12/2014	<b>Order of Dismissal With Prejudice</b> (Judicial Officer: Adair, Valerie) Debtors: Jose De Jesus Garcia (Plaintiff) Creditors: Ford Motor Company (Defendant) Judgment: 09/12/2014, Docketed: 09/19/2014
09/12/2014	<b>Order of Dismissal With Prejudice</b> (Judicial Officer: Adair, Valerie) Debtors: Teresa Garcia Trejo (Plaintiff), Estate of Rafael Trejo (Plaintiff) Creditors: Ford Motor Company (Defendant) Judgment: 09/12/2014, Docketed: 09/19/2014 Comment: Certain Claims
09/15/2014	 Reporters Transcript <i>Jury Trial - Day 5, Friday, September 12, 2014</i>
09/16/2014	 Reporters Transcript <i>Jury Trial - Day 6 Monday, September 15, 2014</i>
09/17/2014	 Reporters Transcript <i>Jury Trial - Day 7, Tuesday, September 16, 2014</i>
09/18/2014	 Motion for Judgment Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Motion for Judgment as a Matter of Law</i>
09/18/2014	 Reporters Transcript

DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

*Transcript of Proceedings Jury Trial - Day 8, Wednesday, September 17, 2014*

09/19/2014	 Reporters Transcript <i>Jury Trial - Day 9, Thursday, September 18, 2014</i>
09/22/2014	 Brief Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiffs' Trial Brief on Jury Instructions</i>
09/22/2014	 Reporters Transcript <i>Jury Trial - Day 10, Friday, September 19, 2014</i>
09/22/2014	 Proposed Jury Instructions Not Used At Trial <i>Defendant's Proposed Jury Instructions Not Used at Trial</i>
09/23/2014	 Reporters Transcript <i>Corrected Jury Trial - Day 10, Friday, September 19, 2014</i>
09/23/2014	 Reporters Transcript <i>Jury Trial - Day 11, Monday, September 22, 2014</i>
09/23/2014	 Jury Instructions
09/23/2014	 Verdict <i>Special Verdict Form With Interrogatories</i>
09/23/2014	<b>Verdict</b> (Judicial Officer: Adair, Valerie) Debtors: Ford Motor Company (Defendant) Creditors: Teresa Garcia Trejo (Plaintiff) Judgment: 09/23/2014, Docketed: 09/30/2014 Total Judgment: 4,500,000.00
09/24/2014	 Reporters Transcript <i>Transcript of Proceedings Jury Trial Day 12, September 23, 2014</i>
10/02/2014	 Order to Statistically Close Case <i>Civil Order to Statistically Close Case</i>
10/07/2014	 Judgment on Jury Verdict Filed By: Plaintiff Trejo, Teresa Garcia <i>Judgment Upon Jury Verdict</i>
10/08/2014	 Notice of Entry of Judgment Filed By: Plaintiff Trejo, Teresa Garcia <i>Notice of Entry of Judgment Upon Jury Verdict</i>
10/10/2014	 Memorandum of Costs and Disbursements Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiff's Memorandum of Costs, Disbursements, and Interest</i>
10/10/2014	 Application Filed By: Plaintiff Trejo, Teresa Garcia <i>Application for Attorney's Fees, Costs, and Interest</i>











DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

10/14/2014	 Motion to Adjudicate Attorney's Lien Filed by: Defendant Koransky, Alan <i>Defendant Alan Koransky's Motion to Adjudicate Attorney's Lien and Order Granting Costs in Favor of Defendant Alan Koransky</i>
10/14/2014	 Notice of Attorney Lien Filed By: Defendant Koransky, Alan <i>Notice of Attorney Lien</i>
10/15/2014	 Motion to Retax Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Motion to Retax and Settle Costs and Disbursements</i>
10/15/2014	 Certificate of Service Filed by: Defendant Koransky, Alan <i>Certificate of Service</i>
10/21/2014	 Motion for Judgment Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Renewed Motion for Judgment as a Matter of Law or, in the Alternative, for a New Trial</i>
10/24/2014	 Opposition to Motion Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Opposition to Plaintiff's Application for Attorneys' Fees, Costs, and Interest</i>
10/30/2014	 Notice of Association of Counsel Filed By: Plaintiff Trejo, Teresa Garcia <i>Notice of Association of Counsel (Sterling Law LLC and Beau Sterling for Plaintiffs)</i>
11/04/2014	 Opposition to Motion Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiff's Opposition to Defendant Ford Motor Company's Motion to Retax and Settle Costs and Disbursements</i>
11/14/2014	 Stipulation and Order Filed by: Defendant Ford Motor Company <i>Stipulation and Order for Oral Argument</i>
11/17/2014	 <b>Motion</b> (3:00 AM) (Judicial Officer: Adair, Valerie) <i>Defendant Alan Koransky's Motion to Adjudicate Attorney's Lien and Order Granting Costs in Favor of Defendant Alan Koransky</i>
11/17/2014	 Notice of Entry of Stipulation and Order Filed By: Defendant Ford Motor Company <i>Notice of Entry of Stipulation and Order for Oral Argument</i>
11/26/2014	 Stipulation Filed by: Plaintiff Trejo, Teresa Garcia <i>Stipulation to Extend Deadline to File Plaintiff's Opposition to Ford's Renewed Motion for Judgment as a Matter of Law or, In the Alternative, for New Trial</i>
12/03/2014	




DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

	 Opposition to Motion Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiff's Opposition to Defendant Ford Motor Company's Renewed Motion For Judgment as a Matter of Law or, in The Alternative, For a New Trial [Resubmitted]</i>
12/03/2014	 Opposition to Motion Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiff's Opposition to Defendant Ford Motor Company's Renewed Motion For Judgment as a Matter of Law or, in The Alternative, For a New Trial</i>
12/03/2014	 Motion to Associate Counsel Filed By: Defendant Ford Motor Company <i>Motion to Associate Counsel</i>
12/03/2014	 Motion to Associate Counsel Filed By: Defendant Ford Motor Company <i>Motion to Associate Counsel</i>
12/03/2014	 Opposition to Motion Filed By: Plaintiff Trejo, Teresa Garcia <i>Plaintiff's Opposition to Defendant Ford Motor Company's Renewed Motion For Judgment as a Matter of Law or, in The Alternative, For a New Trial</i>
12/08/2014	 Stipulation Filed by: Defendant Ford Motor Company <i>Stipulation to Stay Execution of Judgment</i>
12/09/2014	 Notice of Entry Filed By: Defendant Ford Motor Company <i>Notice of Entry of Stipulation to Stay Execution of Judgment</i>
12/15/2014	 Order Granting Motion Filed By: Defendant Koransky, Alan <i>Order Granting Defendant Alan Koransky's Motion to Adjudicate Attorney's Lien and Order Granting Costs in Favor of Defendant Alan Koransky</i>
12/15/2014	<b>Order</b> (Judicial Officer: Adair, Valerie) Debtors: Teresa Garcia Trejo (Plaintiff) Creditors: Alan Koransky (Defendant) Judgment: 12/15/2014, Docketed: 12/22/2014 Total Judgment: 25,648.61
12/16/2014	 Notice of Entry of Order Filed By: Defendant Koransky, Alan <i>Notice of Entry of Order</i>
12/19/2014	 Reply in Support Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Reply in Support of its Motion to Retax and Settle Costs and Disbursements</i>
12/31/2014	 Reply to Opposition Filed by: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Reply to Plaintiffs' Opposition to Its Renewed Motion for Judgment as a Matter of Law or, in the Alternative, for a New Trial</i>

DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

01/07/2015	<b>Motion to Retax</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <b>01/07/2015, 01/12/2015</b> <i>Defendant Ford Motor Company's Motion to Retax and Settle Costs and Disbursements</i>
01/07/2015	<b>Motion for Judgment</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Defendant Ford Motor Company's Renewed Motion for Judgment as a Matter of Law or, in the Alternative, for a New Trial</i>
01/07/2015	<b>Motion for Attorney Fees and Costs</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <b>01/07/2015, 01/12/2015</b> <i>Plaintiff's Motion for Attorney Fees and Costs</i>
01/07/2015	<b>Motion to Associate Counsel</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Defendant's Motion to Associate Counsel - Emily V. Cuatto, Esq.</i>
01/07/2015	<b>Motion to Associate Counsel</b> (9:30 AM) (Judicial Officer: Adair, Valerie) <i>Defendant's Motion to Associate Counsel - Lisa J. Perrochet, Esq.</i>
01/07/2015	 <b>All Pending Motions</b> (9:30 AM) (Judicial Officer: Adair, Valerie)
01/12/2015	 <b>All Pending Motions</b> (3:00 AM) (Judicial Officer: Adair, Valerie)
01/12/2015	 Order Admitting to Practice Filed By: Defendant Ford Motor Company <i>Order Admitting to Practice - Lisa J. Perrochet</i>
01/12/2015	 Order Admitting to Practice Filed By: Defendant Ford Motor Company <i>Order Admitting to Practice - Emily V. Cuatto</i>
01/13/2015	 Notice of Entry of Order Filed By: Defendant Ford Motor Company <i>Notice of Entry of Order Admitting to Practice</i>
01/13/2015	 Notice of Entry of Order Filed By: Defendant Ford Motor Company <i>Notice of Entry of Order Admitting to Practice - Lisa J Perrochet</i>
01/15/2015	 Reporters Transcript <i>Hearing Re: Motions, Wednesday, January 7, 2015</i>
02/18/2015	 <b>Decision</b> (3:00 PM) (Judicial Officer: Adair, Valerie) <i>Defendant Ford Motor Company's Motion to Retax and Settle Costs and Disbursements...Plaintiff's Motion for Attorney Fees and Costs</i>
03/19/2015	 Notice of Entry of Order Filed By: Plaintiff Trejo, Teresa Garcia <i>Notice of Entry of Order</i>
03/19/2015	 Order Filed By: Plaintiff Trejo, Teresa Garcia <i>Order</i>
03/19/2015	<b>Amended Judgment Plus Legal Interest</b> (Judicial Officer: Adair, Valerie) Debtors: Ford Motor Company (Defendant) Creditors: Teresa Garcia Trejo (Plaintiff)

DEPARTMENT 21  
**CASE SUMMARY**  
**CASE NO. A-11-641059-C**

	Judgment: 03/19/2015, Docketed: 10/14/2014 Total Judgment: 5,374,080.21	
03/25/2015	 Notice of Posting Bond Filed By: Defendant Ford Motor Company <i>Notice of Posting Supersedeas Bond and Stay of Execution of Judgment</i>	
04/16/2015	 Notice of Appeal Filed By: Defendant Ford Motor Company <i>Notice of Appeal</i>	
04/16/2015	 Case Appeal Statement Filed By: Defendant Ford Motor Company <i>Defendant Ford Motor Company's Case Appeal Statement</i>	
DATE	FINANCIAL INFORMATION	

<b>Defendant</b> Koransky, Alan	
Total Charges	426.00
Total Payments and Credits	426.00
<b>Balance Due as of 4/20/2015</b>	<b>0.00</b>
<b>Defendant</b> Ford Motor Company	
Total Charges	267.00
Total Payments and Credits	267.00
<b>Balance Due as of 4/20/2015</b>	<b>0.00</b>
<b>Plaintiff</b> Trejo, Teresa Garcia	
Total Charges	330.00
Total Payments and Credits	330.00
<b>Balance Due as of 4/20/2015</b>	<b>0.00</b>



## CIVIL COVER SHEET

CLARK County, Nevada

Case No. \_\_\_\_\_

(Assigned by Clerk's Office)

**I. Party Information**Plaintiff(s) (name/address/phone): TERESA GARCIA TREJO,  
et al.Defendant(s) (name/address/phone): ALAN KORANSKY; FORD  
MOTOR COMPANY

Attorney (name/address/phone):

STACEY A. UPSON

1389 GALLERIA DRIVE, SUITE 110, HENDERSON, NV  
89014, 702.434.8282

Attorney (name/address/phone):

**II. Nature of Controversy** (Please check applicable bold category and  
applicable subcategory, if appropriate)☐ Arbitration Requested**Civil Cases**

Real Property	Torts	
<input type="checkbox"/> <b>Landlord/Tenant</b> <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> <b>Title to Property</b> <input type="checkbox"/> Foreclosure <input type="checkbox"/> Liens <input type="checkbox"/> Quiet Title <input type="checkbox"/> Specific Performance <input type="checkbox"/> <b>Condemnation/Eminent Domain</b> <input type="checkbox"/> <b>Other Real Property</b> <input type="checkbox"/> Partition <input type="checkbox"/> Planning/Zoning	<input type="checkbox"/> <b>Negligence</b> <input type="checkbox"/> Negligence – Auto <input type="checkbox"/> Negligence – Medical/Dental <input type="checkbox"/> Negligence – Premises Liability (Slip/Fall) <input type="checkbox"/> Negligence – Other	<input checked="" type="checkbox"/> <b>Product Liability</b> <input checked="" type="checkbox"/> Product Liability/Motor Vehicle <input type="checkbox"/> Other Torts/Product Liability <input type="checkbox"/> <b>Intentional Misconduct</b> <input type="checkbox"/> Torts/Defamation (Libel/Slander) <input type="checkbox"/> Interfere with Contract Rights <input type="checkbox"/> <b>Employment Torts</b> (Wrongful termination) <input type="checkbox"/> <b>Other Torts</b> <input type="checkbox"/> Anti-trust <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Insurance <input type="checkbox"/> Legal Tort <input type="checkbox"/> Unfair Competition
Probate	Other Civil Filing Types	
<input type="checkbox"/> <b>Summary Administration</b> <input type="checkbox"/> <b>General Administration</b> <input type="checkbox"/> <b>Special Administration</b> <input type="checkbox"/> <b>Set Aside Estates</b> <input type="checkbox"/> <b>Trust/Conservatorships</b> <input type="checkbox"/> Individual Trustee <input type="checkbox"/> Corporate Trustee <input type="checkbox"/> <b>Other Probate</b>	<input type="checkbox"/> <b>Construction Defect</b> <input type="checkbox"/> Chapter 40 <input type="checkbox"/> General <input type="checkbox"/> <b>Breach of Contract</b> <input type="checkbox"/> Building & Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Other Contracts/Acct/Judgment <input type="checkbox"/> Collection of Actions <input type="checkbox"/> Employment Contract <input type="checkbox"/> Guarantee <input type="checkbox"/> Sale Contract <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> <b>Civil Petition for Judicial Review</b> <input type="checkbox"/> Other Administrative Law <input type="checkbox"/> Department of Motor Vehicles <input type="checkbox"/> Worker's Compensation Appeal	<input type="checkbox"/> <b>Appeal from Lower Court</b> (also check applicable civil case box) <input type="checkbox"/> Transfer from Justice Court <input type="checkbox"/> Justice Court Civil Appeal <input type="checkbox"/> <b>Civil Writ</b> <input type="checkbox"/> Other Special Proceeding <input type="checkbox"/> <b>Other Civil Filing</b> <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Conversion of Property <input type="checkbox"/> Damage to Property <input type="checkbox"/> Employment Security <input type="checkbox"/> Enforcement of Judgment <input type="checkbox"/> Foreign Judgment – Civil <input type="checkbox"/> Other Personal Property <input type="checkbox"/> Recovery of Property <input type="checkbox"/> Stockholder Suit <input type="checkbox"/> Other Civil Matters

**III. Business Court Requested** (Please check applicable category; for Clark or Washoe Counties only.)

- ☐
- NRS Chapters 78-88
- 
- ☐
- Commodities (NRS 90)
- 
- ☐
- Securities (NRS 90)

- ☐
- Investments (NRS 104 Art. 8)
- 
- ☐
- Deceptive Trade Practices (NRS 598)
- 
- ☐
- Trademarks (NRS 600A)

- ☐
- Enhanced Case Mgmt/Business
- 
- ☐
- Other Business Court Matters

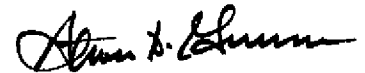
5/09/11

Date

Signature of initiating party or representative

**ORIGINAL**

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CLERK OF THE COURT

BRIAN D. NETTLES, ESQ.  
Nevada Bar No. 7462  
WILLIAM R. KILLIP, JR, ESQ.  
Nevada Bar No. 3660  
NETTLES LAW FIRM  
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[briannettles@nettlawfirm.com](mailto:briannettles@nettlawfirm.com)  
[bill@nettlawfirm.com](mailto:bill@nettlawfirm.com)

Ricardo A. Garcia, Esq.  
LAW OFFICES OF GARCIA & KARAM  
820 South Main Street  
McAllen, TX 78501  
Telephone Number: (956) 630-2882  
Facsimile Number: (956) 630-5393  
Attorneys for Plaintiffs

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

TERESA GARCIA TREJO, et al.

Plaintiffs,

vs.

ALAN KORANSKY, FORD MOTOR  
COMPANY, DOES 1 through 10, ROE  
CORPORATIONS 11 through 20, inclusive

Defendants.

Case No.: A-11-641059-C

Dept. No.: XXI

**JUDGMENT UPON JURY VERDICT**

This action having come on for trial beginning on the 8<sup>th</sup> day of September, 2014, before the Court and a jury, Honorable Valerie Adair, District Judge, presiding, the issues having been duly tried and the jury having duly rendered its verdict on September 23, 2014:

...

**NETTLES LAW FIRM**  
1389 Galleria Drive, Suite 110  
Henderson, NV 89014  
702.434.8282 / 702.434.1488 (fax)

1 IT IS ORDERED AND ADJUDGED that Plaintiff Teresa Garcia Trejo recover from  
2 Defendant Ford Motor Company the principal sum of four million five hundred thousand dollars  
3 and 00/100 (\$4,500,000.00), together with pre-judgment interest in the amount of \$517,376.70,  
4 with interest on the principal amount of the judgment accruing at the rate of 5.25 percent per  
5 annum as provided by law. Plaintiff may apply separately for her costs and attorneys' fees and an  
6 amended judgment will be entered accordingly.

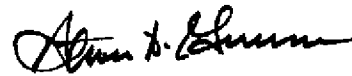
7  
8 DATED this 3<sup>rd</sup> day of October, 2014.

9  
10   
11 DISTRICT COURT JUDGE 

12  
13  
14 Submitted by:

15 NETTLES LAW FIRM

16  
17   
18 By BRIAN D. NETTLES, ESQ.  
19 Nevada Bar No. 7462  
20 WILLIAM R. KILLIP, JR., ESQ.  
21 Nevada Bar No. 3660  
22 1389 Galleria Drive, Suite 200  
23 Henderson, Nevada 89014  
24 Telephone: (702) 434-8282  
25 Facsimile: (702) 434-1488  
26 [briannettles@nettlawfirm.com](mailto:briannettles@nettlawfirm.com)  
27 [bill@nettlawfirm.com](mailto:bill@nettlawfirm.com)  
28 Attorneys for Plaintiff



CLERK OF THE COURT

1 **NEOJ**  
2 BRIAN D. NETTLES, ESQ.  
3 Nevada Bar No. 7462  
4 WILLIAM R. KILLIP, JR, ESQ.  
5 Nevada Bar No. 3660  
6 NETTLES LAW FIRM  
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12 [bill@nettleslawfirm.com](mailto:bill@nettleslawfirm.com)

13 Ricardo A. Garcia, Esq.  
14 LAW OFFICES OF GARCIA & KARAM  
15 820 South Main Street  
16 McAllen, TX 78501  
17 Telephone Number: (956) 630-2882  
18 Facsimile Number: (956) 630-5393  
19 Attorneys for Plaintiffs

20 **DISTRICT COURT**

21 **CLARK COUNTY, NEVADA**

22 TERESA GARCIA TREJO, et al. )

23 Plaintiffs, )

24 vs. )

25 ALAN KORANSKY, FORD MOTOR )  
26 COMPANY, DOES 1 through 10, ROE )  
27 CORPORATIONS 11 through 20, inclusive )

28 Defendants. )

Case No.: A-11-641059-C

Dept. No.: XXI

29 **NOTICE OF ENTRY OF JUDGMENT UPON JURY VERDICT**

30 TO: ALL PARTIES; and

31 TO: THEIR RESPECTIVE ATTORNEYS.

32 ...

33 ...

**NETTLES LAW FIRM**  
1389 Galleria Drive, Suite 110  
Henderson, NV 89014  
702.434.8282 / 702.434.1488 (fax)

1 PLEASE TAKE NOTICE that a Judgment Upon Jury Verdict was dully entered on the  
2 above-entitled matter on 7<sup>th</sup> day of October, 2014, a true and correct copy of said Judgment  
3 Upon Jury Verdict is attached hereto.

4 DATED this 8 day of October, 2014.

5 NETTLES LAW FIRM

6  
7  
8 By 

BRIAN D. NETTLES, ESQ.

Nevada Bar No. 7462

9 WILLAM R. KILLIP, JR., ESQ.

10 Nevada Bar No. 3660

11 1389 Galleria Drive, Suite 200

12 Henderson, Nevada 89014

13 Telephone: (702) 434-8282

14 Facsimile: (702) 434-1488

15 [briannettles@nettleslawfirm.com](mailto:briannettles@nettleslawfirm.com)

16 [bill@nettleslawfirm.com](mailto:bill@nettleslawfirm.com)

17 Attorneys for Plaintiffs  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF E-SERVICE**

Pursuant to NEFCR 9, NRCP 5(b) and EDCR 7.26, I hereby certify that on the 8<sup>th</sup> day of October, 2014, a true and correct copy of the foregoing *Notice of Entry of Judgment Upon Jury Verdict* was served to the following party electronic transmission through the Wiznet system:

Michael R. Hall, Esq.  
HALL JAFFE & CLAYTON, LLP  
7455 West Washington Avenue, Suite 460  
Las Vegas, NV 89128  
Telephone Number: (702) 316-4111  
Facsimile Number: (702) 316-4114  
Attorney for Defendant,  
*Alan Koransky*

Joshua D. Cools, Esq.  
Jay J. Schutttert, Esq.  
SNELL & WILMER, LP  
3883 Howard Hughes Parkway, Suite 110  
Las Vegas, NV 89169  
Telephone Number: (702) 784-5200  
Facsimile Number: (702) 784-5252  
Attorney for Defendant,  
*Ford Motor Company*

**CERTIFICATE OF SERVICE BY MAIL**

Pursuant to NRCP 5(b) and EDCR 7.26, I hereby certify that on the 8<sup>th</sup> day of October, 2014, a true and correct copy of the foregoing *Notice of Entry of Judgment Upon Jury Verdict* was served to the following party by facsimile and regular mail, addressed as follows, as they have not been added to the E-Service Master List on Wiznet:

Ricardo A. Garcia, Esq.  
LAW OFFICES OF GARCIA & KARAM  
820 South Main Street  
McAllen, TX 78501  
Telephone Number: (956) 630-2882  
Facsimile Number: (956) 630-5393  
*Attorney for Plaintiffs*

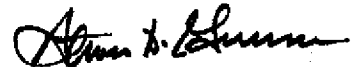
Larry W. Lawrence, Jr., Esq.  
LAWRENCE LAW FIRM  
3112 Windsor Rd. #A234  
Austin, Texas 78703  
Telephone Number: (956) 994-0057  
Facsimile Number: (956) 994-0741  
*Attorneys for Plaintiffs*



An employee of the  
NETTLES LAW FIRM

**ORIGINAL**

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CLERK OF THE COURT

BRIAN D. NETTLES, ESQ.  
Nevada Bar No. 7462  
WILLIAM R. KILLIP, JR, ESQ.  
Nevada Bar No. 3660  
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Facsimile Number: (956) 630-5393  
Attorneys for Plaintiffs

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

TERESA GARCIA TREJO, et al.

Plaintiffs,

vs.

ALAN KORANSKY, FORD MOTOR  
COMPANY, DOES 1 through 10, ROE  
CORPORATIONS 11 through 20, inclusive

Defendants.

Case No.: A-11-641059-C

Dept. No.: XXI

**JUDGMENT UPON JURY VERDICT**

This action having come on for trial beginning on the 8<sup>th</sup> day of September, 2014, before the Court and a jury, Honorable Valerie Adair, District Judge, presiding, the issues having been duly tried and the jury having duly rendered its verdict on September 23, 2014:

...

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1389 Galleria Drive, Suite 110  
Henderson, NV 89014  
702.434.8282 / 702.434.1488 (fax)

NETTLES LAW FIRM  
1389 Galleria Drive, Suite 110  
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702.434.8282 / 702.434.1488 (fax)

1 IT IS ORDERED AND ADJUDGED that Plaintiff Teresa Garcia Trejo recover from  
2 Defendant Ford Motor Company the principal sum of four million five hundred thousand dollars  
3 and 00/100 (\$4,500,000.00), together with pre-judgment interest in the amount of \$517,376.70,  
4 with interest on the principal amount of the judgment accruing at the rate of 5.25 percent per  
5 annum as provided by law. Plaintiff may apply separately for her costs and attorneys' fees and an  
6 amended judgment will be entered accordingly.

7  
8 DATED this 3<sup>rd</sup> day of October, 2014.

9  
10   
11 DISTRICT COURT JUDGE *per*

12  
13  
14 Submitted by:

15 NETTLES LAW FIRM

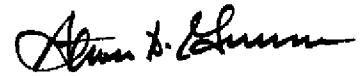
16  
17 By   
18 BRIAN D. NETTLES, ESQ.  
19 Nevada Bar No. 7462  
20 WILLIAM R. KILLIP, JR., ESQ.  
21 Nevada Bar No. 3660  
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28 Attorneys for Plaintiff



NETTLES LAW FIRM  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
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CLERK OF THE COURT

**ORDER**

BRIAN D. NETTLES, ESQ.  
Nevada Bar No. 7462  
WILLIAM R. KILLIP, JR., ESQ.  
Nevada Bar No. 3660  
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Facsimile: (702) 434-1488  
*Attorneys for Plaintiffs*

Ricardo A. Garcia, Esq.  
LAW OFFICES OF GARCIA & KARAM  
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McAllen, TX 78501  
Telephone Number: (956) 630-2882  
Facsimile Number: (956) 630-5393  
*Plaintiffs Attorney Pro Hac Vice*

Larry W. Lawrence, Jr., Esq.  
LAWRENCE LAW FIRM  
3112 Windsor Rd., #A234  
Austin, TX 78703  
Telephone: (956) 994-0057  
Facsimile: (956) 994-0741  
*Plaintiffs Attorney Pro Hac Vice*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

TERESA GARCIA TREJO, as The Success-in-  
Interest and Surviving Spouse of Rafael Trejo  
Deceased,

Plaintiff,

vs.

FORD MOTOR COMPANY,

Defendant.

Case No.: A-11-641059-C  
Dept.: XXI

**ORDER**

///

Date of Hearing: January 7, 2015  
Time of Hearing: 9:30 a.m.

Plaintiff's Application for Attorneys' Fees, Costs and Interest filed on October 10, 2014; Ford Motor Company's Motion to Retax and Settle Costs and Disbursements filed on October 15, 2014; and Ford Motor Company's Renewed Motion for Judgment as a Matter of Law or, in the alternative, for a New Trial filed on October 21, 2014, came before the Court for hearing on January 7, 2015, before the Honorable Judge Valerie Adair. Plaintiff appeared through her counsel Larry W. Lawrence, Esq., Ricardo Garcia, Esq., Jody R. Mask, Esq., and William R. Killip, Jr., Esq. Defendant appeared through its counsel Jay J. Schutttert, Esq., Morgan T. Petrelli, Esq., and Michael W. Eady, Esq.

The Court having read and considered the pleadings on file, oppositions and replies thereto, and having heard the oral arguments of counsel, and having considered the matter and being fully advised, and good cause appearing therefore, enters the following:

**IT IS HEREBY ORDERED, ADJUDGED AND DECREED** that Defendant Ford Motor Company's Renewed Motion for Judgment as a Matter of Law, or in the Alternative, for a New Trial is hereby **DENIED**.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Court's analysis of the Beattie factors as outlined in the Court's February 18, 2015 Minutes precludes an award of attorneys' fees, and therefore, Plaintiff's Application for Attorneys' Fees is **DENIED**.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Defendant Ford Motor Company's Motion to Retax and Settle Costs and Disbursements is **GRANTED IN PART** and **DENIED IN PART**. Plaintiff is awarded costs in the total amount of three hundred fifty-six thousand seven hundred three dollars and 51/100 cents (\$356,703.51), with interest accruing at the statutory rate beginning October 8, 2014.

///

///

**AMENDED JUDGMENT**

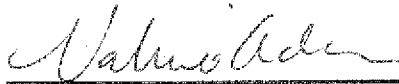
Accordingly,

**IT IS FURTHER ORDERED** that Plaintiff Teresa Trejo is entitled to judgment against Defendant Ford Motor Company as follows:

Jury Verdict:	\$ 4,500,000.00
Pre-Judgment Interest	\$ 517,376.70
<u>Allocated Costs:</u>	<u>\$ 356,703.51</u>
JUDGMENT TOTAL:	\$ 5,374,080.21 <sup>1</sup>

All requested relief not expressly granted herein is denied.

**IT IS SO ORDERED** this 16<sup>th</sup> day of March, 2015.



DISTRICT COURT JUDGE *Bo*

<sup>1</sup> All amounts awarded in the Judgment Upon Jury Verdict entered on October 8, 2014, and awarded herein shall bear post-judgment interest at the statutory rate from October 8, 2014 until satisfied:

**NETTLES LAW FIRM**  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
702.434.8282 / 702.434.1488 (fax)

*Trejo vs. Ford Motor Company*  
*Case No.: A-11-641059-C*  
*Dept. XXI*

Respectfully submitted by:  
NETTLES LAW FIRM

By

  
William R. Killip, Jr., Esq.

Nevada Bar No. 3660

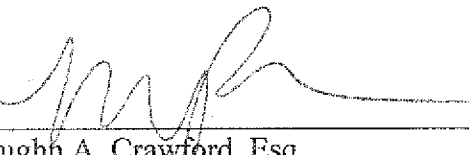
1389 Galleria Drive, Suite 200

Henderson, NV 89014

*Attorneys for Plaintiff*

Approved as to form and content:  
SNELL & WILMER L.L.P.

By

  
Vaughn A. Crawford, Esq.

Nevada Bar No. 7665

Jay J. Schuttart, Esq.

Nevada Bar No. 8656

Morgan Petrelli, Esq.

Nevada Bar No. 13221

3883 Howard Hughes Parkway, Suite 1100

Las Vegas, NV 89169

Michael W. Eady (Pro Hac Vice)

Thompson Coe Cousins & Irons, L.L.P.

701 Brazos St., 15th Floor

Austin, TX 78701

Lisa J. Perrochet (Pro Hac Vice)

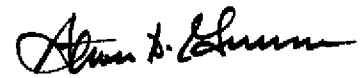
Emily V. Cuatto (Pro Hac Vice)

Horvitz & Levy LLP

15760 Ventura Boulevard, 18th Floor

Encino, CA 91436

*Attorneys for Defendant*  
*Ford Motor Company*



CLERK OF THE COURT

**NETTLES LAW FIRM**  
1389 Galleria Drive, Suite 110  
Henderson, NV 89014  
702.434.8282 / 702.434.1488 (fax)

1 **NEOJ**  
2 BRIAN D. NETTLES, ESQ.  
3 Nevada Bar No. 7462  
4 WILLIAM R. KILLIP, JR., ESQ.  
5 Nevada Bar No. 3660  
6 NETTLES LAW FIRM  
7 1389 Galleria Drive, Suite 200  
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9 Telephone: (702) 434-8282  
10 Facsimile: (702) 434-1488  
11 *Attorney for Plaintiffs*

8 Ricardo A. Garcia, Esq.  
9 LAW OFFICES OF GARCIA & KARAM  
10 820 South Main Street  
11 McAllen, TX 78501  
12 Telephone Number: (956) 630-2882  
13 Facsimile Number: (956) 630-5393  
14 *Plaintiffs Attorney Pro Hac Vice*

13 Larry W. Lawrence, Jr., Esq.  
14 LAWRENCE LAW FIRM  
15 3112 Windsor Rd. #A234  
16 Austin, Texas 78703  
17 Telephone Number: (956) 994-0057  
18 Facsimile Number: (956) 994-0741  
19 *Plaintiffs Attorney Pro Hac Vice*

18 **DISTRICT COURT**

19 **CLARK COUNTY, NEVADA**

20 TERESA GARCIA TREJO, et al. )

21 )  
22 Plaintiffs, )

Case No.: A-11-641059-C

23 vs. )

Dept. No.: XXI

24 ALAN KORANSKY, FORD MOTOR )  
25 COMPANY, DOES 1 through 10, ROE )  
26 CORPORATIONS 11 through 20, inclusive )

27 Defendants. )  
28 )

**NOTICE OF ENTRY ORDER**

**NETTLES LAW FIRM**  
1389 Galleria Drive, Suite 110  
Henderson, NV 89014  
702.434.8282 / 702.434.1488 (fax)

**NOTICE OF ENTRY ORDER**

TO: ALL PARTIES; and  
TO: THEIR RESPECTIVE ATTORNEYS.

**PLEASE TAKE NOTICE** that an Order was dully entered on the above-entitled matter on 19<sup>th</sup> day of March, 2015, a true and correct copy of said Order is attached hereto.

DATED this 19 day of March, 2015.

NETTLES LAW FIRM

By 

BRIAN D. NETTLES, ESQ.

Nevada Bar No. 7462

WILLAM R. KILLIP, JR., ESQ.

Nevada Bar No. 3660

1389 Galleria Drive, Suite 200

Henderson, Nevada 89014

Telephone: (702) 434-8282

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[briannettles@nettleslawfirm.com](mailto:briannettles@nettleslawfirm.com)

[bill@nettleslawfirm.com](mailto:bill@nettleslawfirm.com)

Attorneys for Plaintiffs

**CERTIFICATE OF E-SERVICE**

Pursuant to NEFCR 9, NRCP 5(b) and EDCR 7.26, I hereby certify that on the 19<sup>th</sup> day of March, 2015, a true and correct copy of the foregoing *Notice of Entry of Order* was served to the following party electronic transmission through the Wiznet system:

Vaughn A. Crawford, Esq.  
Jay J. Schuttert, Esq.  
Morgan Petrelli, Esq.  
SNELL & WILMER, LP  
3883 Howard Hughes Parkway, Suite 110  
Las Vegas, NV 89169  
Telephone Number: (702) 784-5200  
Facsimile Number: (702) 784-5252  
*Attorney for Defendant  
Ford Motor Company*

Michael W. Eady, Esq.  
THOMPSON COE COUSINS & IRONS,  
L.L.P.  
701 Brazos St., 15<sup>th</sup> Fl.  
Austin, Texas 78701  
*Attorney for Defendant  
Ford Motor Company*

Beau Sterling, Esq.  
STERLING LAW, LLC  
228 South 4<sup>th</sup> Street, 1<sup>st</sup> Floor  
Las Vegas, NV 89101  
*Attorney for Plaintiffs*

**CERTIFICATE OF SERVICE BY MAIL**

Pursuant to NRCP 5(b) and EDCR 7.26, I hereby certify that on the 19<sup>th</sup> day of March, 2015, a true and correct copy of the foregoing *Notice of Entry of Order* was served to the following party by facsimile and regular mail, addressed as follows, as they have not been added to the E-Service Master List on Wiznet:

Ricardo A. Garcia, Esq.  
LAW OFFICES OF GARCIA & KARAM  
820 South Main Street  
McAllen, TX 78501  
Telephone Number: (956) 630-2882  
Facsimile Number: (956) 630-5393  
*Attorney for Plaintiffs*

Larry W. Lawrence, Jr., Esq.  
LAWRENCE LAW FIRM  
3112 Windsor Rd. #A234  
Austin, Texas 78703  
Telephone Number: (956) 994-0057  
Facsimile Number: (956) 994-0741  
*Attorneys for Plaintiffs*



An employee of the  
NETTLES LAW FIRM

NETTLES LAW FIRM  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
702.434.8282 / 702.434.1488 (fax)

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CLERK OF THE COURT

1 **ORDER**

2 BRIAN D. NETTLES, ESQ.  
3 Nevada Bar No. 7462  
4 WILLIAM R. KILLIP, JR., ESQ.  
5 Nevada Bar No. 3660  
6 NETTLES LAW FIRM  
7 1389 Galleria Drive, Suite 200  
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9 Telephone: (702) 434-8282  
10 Facsimile: (702) 434-1488  
11 *Attorneys for Plaintiffs*

12 Ricardo A. Garcia, Esq.  
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14 820 South Main Street  
15 McAllen, TX 78501  
16 Telephone Number: (956) 630-2882  
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18 *Plaintiffs Attorney Pro Hac Vice*

19 Larry W. Lawrence, Jr., Esq.  
20 LAWRENCE LAW FIRM  
21 3112 Windsor Rd., #A234  
22 Austin, TX 78703  
23 Telephone: (956) 994-0057  
24 Facsimile: (956) 994-0741  
25 *Plaintiffs Attorney Pro Hac Vice*

18 **DISTRICT COURT**

19 **CLARK COUNTY, NEVADA**

20 TERESA GARCIA TREJO, as The Success-in- )  
21 Interest and Surviving Spouse of Rafael Trejo )  
22 Deceased, )

Case No.: A-11-641059-C  
Dept.: XXI

23 Plaintiff, )

**ORDER**

24 vs. )

25 FORD MOTOR COMPANY, )

26 Defendant. )  
27 )

28 ///



Date of Hearing: January 7, 2015  
Time of Hearing: 9:30 a.m.

Plaintiff's Application for Attorneys' Fees, Costs and Interest filed on October 10, 2014; Ford Motor Company's Motion to Retax and Settle Costs and Disbursements filed on October 15, 2014; and Ford Motor Company's Renewed Motion for Judgment as a Matter of Law or, in the alternative, for a New Trial filed on October 21, 2014, came before the Court for hearing on January 7, 2015, before the Honorable Judge Valerie Adair. Plaintiff appeared through her counsel Larry W. Lawrence, Esq., Ricardo Garcia, Esq., Jody R. Mask, Esq., and William R. Killip, Jr., Esq. Defendant appeared through its counsel Jay J. Schuttert, Esq., Morgan T. Petrelli, Esq., and Michael W. Eady, Esq.

The Court having read and considered the pleadings on file, oppositions and replies thereto, and having heard the oral arguments of counsel, and having considered the matter and being fully advised, and good cause appearing therefore, enters the following:

**IT IS HEREBY ORDERED, ADJUDGED AND DECREED** that Defendant Ford Motor Company's Renewed Motion for Judgment as a Matter of Law, or in the Alternative, for a New Trial is hereby **DENIED**.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Court's analysis of the Beattie factors as outlined in the Court's February 18, 2015 Minutes precludes an award of attorneys' fees, and therefore, Plaintiff's Application for Attorneys' Fees is **DENIED**.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that Defendant Ford Motor Company's Motion to Retax and Settle Costs and Disbursements is **GRANTED IN PART** and **DENIED IN PART**. Plaintiff is awarded costs in the total amount of three hundred fifty-six thousand seven hundred three dollars and 51/100 cents (\$356,703.51), with interest accruing at the statutory rate beginning October 8, 2014.

///

///

1 AMENDED JUDGMENT

2 Accordingly,

3 **IT IS FURTHER ORDERED** that Plaintiff Teresa Trejo is entitled to judgment against  
4 Defendant Ford Motor Company as follows:

5	Jury Verdict:	\$ 4,500,000.00
6	Pre-Judgment Interest	\$ 517,376.70
7	<u>Allocated Costs:</u>	<u>\$ 356,703.51</u>
8	JUDGMENT TOTAL:	\$ 5,374,080.21 <sup>1</sup>

9 All requested relief not expressly granted herein is denied.

10 **IT IS SO ORDERED** this 16<sup>th</sup> day of March, 2015.

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13 \_\_\_\_\_  
14 DISTRICT COURT JUDGE *Bw*

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NETTLES LAW FIRM  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
702.434.8282 / 702.434.1488 (fax)

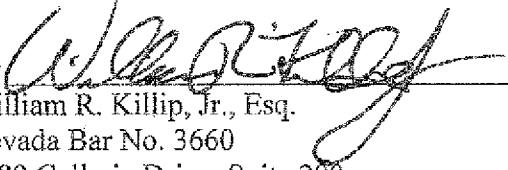
<sup>1</sup> All amounts awarded in the Judgment Upon Jury Verdict entered on October 8, 2014, and awarded herein shall bear post-judgment interest at the statutory rate from October 8, 2014 until satisfied.

NETTLES LAW FIRM  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
702.434.8282 / 702.434.1488 (fax)

Trejo vs. Ford Motor Company  
Case No.: A-11-641059-C  
Dept. XXI

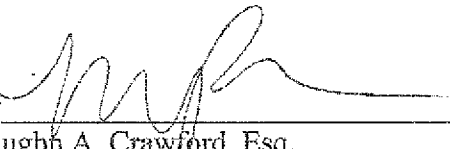
Respectfully submitted by:  
NETTLES LAW FIRM

By

  
William R. Killip, Jr., Esq.  
Nevada Bar No. 3660  
1389 Galleria Drive, Suite 200  
Henderson, NV 89014  
*Attorneys for Plaintiff*

Approved as to form and content:  
SNELL & WILMER L.L.P.

By

  
Vaughn A. Crawford, Esq.  
Nevada Bar No. 7665  
Jay J. Schuttert, Esq.  
Nevada Bar No. 8656  
Morgan Petrelli, Esq.  
Nevada Bar No. 13221  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, NV 89169

Michael W. Eady (Pro Hac Vice)  
Thompson Coe Cousins & Irons, L.L.P.  
701 Brazos St., 15th Floor  
Austin, TX 78701

Lisa J. Perrochet (Pro Hac Vice)  
Emily V. Cuatto (Pro Hac Vice)  
Horvitz & Levy LLP  
15760 Ventura Boulevard, 18th Floor  
Encino, CA 91436

*Attorneys for Defendant*  
*Ford Motor Company*

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**August 01, 2011**

---

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

---

**August 01, 2011      3:00 AM      Motion to Associate  
Counsel**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- COURT ORDERED, motion GRANTED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**August 31, 2011**

---

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

---

**August 31, 2011      9:30 AM      Motion to Dismiss**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Susie Schofield

**RECORDER:** Janie Olsen

**REPORTER:**

**PARTIES**

**PRESENT:**      Schuttert, Jay J.      Attorney  
Upson, Stacey A      Attorney

**JOURNAL ENTRIES**

- Defendant Ford Motor Company's Motion to Dismiss Plaintiffs' Claims for Punitive Damages

Bri Issuidutt, Attorney for Defendant, also present. Arguments by counsel. Court FINDS this is premature; there is an issue as to whether there is a claim for punitive damages and discovery is needed. COURT ORDERED, Motion DENIED. Ms. Upson to prepare the Order.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**September 12, 2011**

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A-11-641059-C

Teresa Trejo, Plaintiff(s)

vs.

Ford Motor Company, Defendant(s)

---

**September 12, 2011**

**3:00 AM**

**Motion for More Definite  
Statement**

**HEARD BY:** Adair, Valerie

**COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:**

**REPORTER:**

**PARTIES**

**PRESENT:**

**JOURNAL ENTRIES**

- COURT ORDERED, motion GRANTED as unopposed; Plaintiff has two weeks to file and amended complaint.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**February 04, 2013**

---

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

---

**February 04, 2013      1:30 PM      Motion to Compel**

**HEARD BY:** Beecroft, Chris A, Jr.      **COURTROOM:** Phoenix Building Courtroom -  
11th Floor

**COURT CLERK:** Alan Castle

**RECORDER:** Richard Kangas

**REPORTER:**

**PARTIES**

**PRESENT:**      Cools, Joshua D.      Attorney  
                 Hall, Michael R      Attorney  
                 Marshall, Eric L.      Attorney

**JOURNAL ENTRIES**

- Arguments by counsel. COMMISSIONER RECOMMENDED, Defendant Alan Koransky's Motion to Compel Responses from Plaintiff Jose de Jesus Garcia to First Set of Interrogatories and Request for Production of Documents, and for Sanctions GRANTED. FURTHER RECOMMENDED, \$150.00 attorney fees to be paid to Defendant's counsel. Mr. Hall will prepare Report and Recommendation and submit to Discovery Commissioner within ten (10) days of this hearing, otherwise, SANCTIONS MAY ISSUE; Mr. Marshall and Mr. Cools to approve as to form and content. Matter set for status check on compliance.

3/04/13 2:00 p.m. Status Check: Report and Recommendations

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**March 04, 2013**

---

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

---

**March 04, 2013      2:00 PM      Status Check:  
Compliance/Sanctions**

**HEARD BY:** Beecroft, Chris A, Jr.      **COURTROOM:** RJC Courtroom 12C

**COURT CLERK:** Alan Castle

**RECORDER:** Richard Kangas

**REPORTER:**

**PARTIES**

**PRESENT:** Shannon, Michael J.      Attorney

**JOURNAL ENTRIES**

- Upon Court's inquiry regarding report and recommendation, counsel indicated ; Discovery Commissioner noted this court typically rules that all objections are waived if responses are not answered timely. Further, it may be that it was not specifically addressed in this case at the February 4th hearing. Counsel should make that representation to opposing counsel. Commissioner is available by conference call if necessary. COMMISSIONER directed counsel to get report in RECOMMENDED, status check CONTINUED.

4/08/13 2:00 p.m. Status Check: Report & Recommendation



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability****COURT MINUTES****April 08, 2013**

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

<b>April 08, 2013</b>	<b>1:30 PM</b>	<b>Motion to Extend Discovery</b>	<b>Plaintiff's Motion to Extend Discovery on an Order Shortening Time (Second Request)</b>
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**HEARD BY:** Beecroft, Chris A, Jr.**COURTROOM:** RJC Courtroom 03A**COURT CLERK:** Alan Castle**RECORDER:** Richard Kangas**REPORTER:****PARTIES**

<b>PRESENT:</b>	Marshall, Eric L.	Attorney
	Shannon, Michael J.	Attorney

**JOURNAL ENTRIES**

- Arguments by counsel. Discovery Commissioner Finds rule 2.34 & 2.35 have not been complied with and he is not inclined to recommend an extension of discovery that would cause a continuance of the trial in this matter. Colloquy regarding inspection of vehicle in Texas. COMMISSIONER RECOMMENDED, Plaintiff's motion DENIED based on the pleadings; FURTHER, alternative relief GRANTED as to only extending expert discovery deadlines by 30 days, respectively; all other cutoffs remain the same. Mr. Marshall will prepare Report and Recommendation and submit to Discovery Commissioner within ten (10) days of this hearing, otherwise, SANCTIONS MAY ISSUE; Mr. Cools and Mr. Shannon to approve as to form and content. Matter set for status check on compliance.

4/29/13 2:00 p.m. Status Check: Report and Recommendations

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability****COURT MINUTES****April 29, 2013**

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

**April 29, 2013****2:00 PM****Status Check:  
Compliance/Sanctions****Status Check:  
Compliance/Sanctions - DCRR****HEARD BY:** Beecroft, Chris A, Jr.**COURTROOM:** Phoenix Building Courtroom -  
11th Floor**COURT CLERK:** Alan Castle**RECORDER:** Richard Kangas**REPORTER:****PARTIES****PRESENT:**

**JOURNAL ENTRIES**

- Mr. Marshall having failed to appear and having failed to submit Report & Recommendation from the 04/08/13, hearing, is herein sanctioned \$250.00, payable to the Clark County Pro Bono Project within 30 days. Submit proof of payment to Commissioner. Further, this matter is set for a follow-up status check on 6/03/13 at 2:00 p.m. If the Report & Recommendation has not been submitted by that time, additional sanctions will be warranted.

6/03/13 2:00 p.m. Status Check: Report and Recommendations

CLERK'S NOTE: The above minute order has been distributed to: Eric Marshall, Esq.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**July 10, 2013**

---

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

---

**July 10, 2013      9:30 AM      Motion to Set Trial Date**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Phyllis Irby

**RECORDER:** Janie Olsen

**REPORTER:**

**PARTIES**

**PRESENT:**      Cools, Joshua D.      Attorney  
Hengstler, Joel, ESQ      Attorney  
Shannon, Michael J.      Attorney

**JOURNAL ENTRIES**

- Parties announced ready for trial 3 - 4 weeks, requested trial date be changed. COURT ORDERED, TRIAL DATE VACATED & RESET.

2-10-14 9:00 AM CALENDAR CALL (DEPT. XXI)

2-24-14 9:30 AM JURY TRIAL (DEPT. XXI)

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**October 07, 2013**

---

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

---

**October 07, 2013      3:00 AM      Motion to Associate  
Counsel**

**HEARD BY:** Adair, Valerie

**COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- COURT ORDERED, Plaintiff's Motion to Associate Counsel is GRANTED.

CLERK'S NOTE: A copy of this minute order placed in the attorney folder of:

Eric Marshall, Esq. (NETTLES LAW FIRM)

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**January 15, 2014**

---

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

---

**January 15, 2014      9:30 AM      All Pending Motions**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Ying Pan

**RECORDER:** Janie Olsen

**REPORTER:**

**PARTIES**

**PRESENT:**      Cools, Joshua D.      Attorney  
                         Shannon, Michael J.      Attorney

**JOURNAL ENTRIES**

- DEFENDANT ALAN KORANSKY'S MOTION FOR SUMMARY JUDGMENT ... FORD MOTOR COMPANY'S MOTION TO CONTINUE TRIAL ON OST

Attorney William Killip (Bar No. 3660) appearing for Attorney Eric Marshall, on behalf of Plaintiffs.

There being no opposition, COURT ORDERED, Ford Motor Company's Motion to Continue Trial on OST is GRANTED, Trial Date VACATED, and RESET. Argument by counsel as to a proposed stipulation, timeliness of receiving the proposed stipulation, and the timeliness of filing of Opposition. COURT FURTHER ORDERED, Defendant Alan Koransky's Motion for Summary Judgment is GRANTED as unopposed. Order submitted in Open Court.

8-25-14 9:00 AM CALENDAR CALL

9-8-14 9:30 AM JURY TRIAL

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**March 10, 2014**

---

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

---

**March 10, 2014      3:00 AM      Motion for Costs**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- COURT ORDERED, Defendant Alan Koransky's Motion for Costs is GRANTED as follows:

Costs awarded in the amount of \$25,648.61 with expert fees reduced by \$7,500.00.

CLERK'S NOTE: Above minute modified to reflect that costs are to be awarded rather than fees. dh  
4/11/14

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**July 30, 2014**

---

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

---

**July 30, 2014      9:30 AM      Motion**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Athena Trujillo

**RECORDER:** Janie Olsen

**REPORTER:**

**PARTIES**

**PRESENT:** Cools, Joshua D.      Attorney

**JOURNAL ENTRIES**

- Mr. Cools advised there is no opposition to the questionnaire. Court noted it does not like to use questionnaires, but will do so reluctantly. COURT ORDERED, motion GRANTED. Court advised counsel must meet with the Court before jury selection to agree on who to excuse.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**August 25, 2014**

---

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
                                 vs.  
                                 Ford Motor Company, Defendant(s)

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**August 25, 2014      9:00 AM      Calendar Call**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:** Janie Olsen

**REPORTER:**

**PARTIES**

**PRESENT:**      Estate of Rafael Trejo      Plaintiff  
                         Morris, Christian      Attorney  
                         Schuttert, Jay J.      Attorney

**JOURNAL ENTRIES**

- Counsel announced ready. Colloquy regarding jury instructions. The Court informed parties that they will meet in Chambers on September 3 to review the jury questionnaires. Counsel to provide the information to the Court's JEA by Tuesday at noon.



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**September 03, 2014**

---

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

---

**September 03, 2014    9:30 AM      All Pending Motions**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:** Janie Olsen

**REPORTER:**

**PARTIES**

**PRESENT:**      Crawford, Vaughn A.      Attorney  
                 Killip, Jr., William R.      Attorney  
                 Schuttert, Jay J.      Attorney

**JOURNAL ENTRIES**

- Richard Garcia appearing Pro Hoc Vice for the Plaintiff.

Following arguments of counsel, COURT ORDERED, as follows:

(1) DEFT FORD'S MOTION IN LIMINE TO EXCLUDE REFERENCES TO VOLVO OR FORD'S OWNERSHIP OF VOLVO MOTION 1 - GRANTED as to Ford's ownership of Volvo as relevant;

(2) DEFT FORD'S MOTION IN LIMINE TO EXCLUDE EVIDENCE OF THE WEAVER MEMO MOTION 2 - GRANTED; can be used to show history of study as to powerpoint. Counsel directed to provide the clerk with a copy of the power point which will be marked as a Court's exhibit;

(3) DEFT FORD'S MOTION IN LIMINE TO EXCLUDE EVIDENCE OF OTHER ACCIDENTS, INCIDENTS, COMPLAINTS, OR LAWSUTTS MOTION 3 - GRANTED generally i.e.: if the door is opened;

(4) DEFT FORD'S MOTION IN LIMINE TO EXCLUDE EVIDENCE OF DROP TESTS MOTION 4. DENIED; this is a question for the jury;

(5) DEFT FORD'S MOTION IN LIMINE TO EXCLUDE ANY REFERENCE TO ALLEGED SEATBELT DEFECTS MOTION 5. GRANTED:

(6) DEFT FORD'S MOTION IN LIMINE TO EXCLUDE ANY REFERENCE TO THE INSURANCE INSTITUTE OF HIGHWAY SAFETY'S TESTING AND RATINGS MOTION 6. GRANTED general with the caveat that in cross examination they show it is totally unrelated. They can ask if they know about this study.

(7) DEFT FORD'S MOTION IN LIMINE TO EXCLUDE ANY EVIDENCE OF THEORETICAL APPLICATION OF FMVSS 216 MOTION 7. The Court informed counsel that it will have to see the document to be redacted;

(8) DEFT FORD'S MOTION TO EXCLUDE PLAINTIFF'S EXPERT BRIAN HERBST MOTION 8. DENIED.

(9) PLAINTIFF'S MOTION IN LIMINE TO EXCLUDE EVIDENCE AND ARGUMENT OF TERESA GARCIS TREJO'S NEGLIGENCE. GRANTED, but Plaintiff cant suggest the accident was the result of negligence;

(10) PLAINTIFF'S MOTION IN LIMINE TO EXCLUDE EVIDENCE AND ARGUMENT OF DISSIMILAR TESTS ON DISSIMILAR VEHICLES. DENIED;

(11) PLAINTIFF'S MOTION IN LIMINE TO EXCLUDE REFERENCE TO THE CONTROLLED ROLLORER IMPACT SYSTEM (CRIS) TESTING INCLUDING VIDEOS AND CONCLUSIONS. DENIED;

(12) PLAINTIFF'S MOTION IN LIMINE TO EXCLUDE OPINIONS OF TODD HOOVER AND JEFF CROTEAU. DENIED.

(13) PLAINTIFF'S MOTION IN LIMINE CHALLENGING FORD EXPERT JEFF CROTEAU'S EXPERT TESTIMONY REGARDING STATISTICS. DENIED.

(14) DEFENDANT FORD'S MOTION TO LIMIT THE TESTIMONY OF DR. ROSS ZUMWALT ON AN ORDER SHORTENING TIME. DENIED WITHOUT PREJUDICE;

(15) DEFENDANT FORD'S MOTION TO EXCLUDE PLAINTIFF'S EXPERTS' UNTIMELY NEW OPINIONS ON AN ORDER SHORTENING TIME. Court said it could be asked as a hypothetical.

(16) PLAINTIFFS' MOTION TO EXCLUDE UNTIMELY DISCLOSURES ON AN ORDER

SHORTENING TIME. Court stated this has already been discussed.

(17) PLAINTIFFS' MOTION TO ASSOCIATE COUNSEL ON AN ORDER SHORTENING TIME.  
GRANTED;

(18) DEFT FORD'S MOTION TO ASSOCLATE COUNSEL ON AN ORDER SHORTENING TIME.  
GRANTED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

## Product Liability

## COURT MINUTES

September 08, 2014

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

September 08, 2014 9:00 AM Jury Trial - FIRM

**HEARD BY:** Adair, Valerie **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:** Janie Olsen

**REPORTER:**

## PARTIES

<b>PRESENT:</b>	Crawford, Vaughn A.	Attorney
	Killip, Jr., William R.	Attorney
	Lawrence, Larry W.	Attorney
	Schuttert, Jay J.	Attorney

## JOURNAL ENTRIES

- Rick Garcia and Jody Mask appearing Pro Hac Vice with Plaintiff. Mike Eady appearing Pro Hac Vice with Defendant.

IN THE PRESENCE OF THE JURY. Introductions by Court and counsel. Roll of jurors call by the clerk. OUTSIDE THE PRESENCE OF THE JURY. Colloquy regarding for cause challenges. IN THE PRESENCE OF THE JURY. Jury SELECTED AND SWORN. Introductory comments by the Court. OUTSIDE THE PRESENCE OF THE JURY. Mr. Lawrence argued Discovery matter regarding roof and vehicle. Brochure listed the "safety cell", which was not provided by the Defendant. Mr. Schuttert stated that he is hearing this issue for the first time. Mr. Lawrence advised that he found the document on-line the night before; it is a Ford document. The Court stated there is a timeliness issue, and why Ford didn't product the document; the Court finds this concerning. Mr. Crawford advised that he would do his best this afternoon to get an answer; if we had the document and should have produced it, the Plaintiff is free to use it. Evening recess. MATTER CONTINUED.

PRINT DATE: 04/20/2015

Page 17 of 35

Minutes Date: August 01, 2011

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**September 09, 2014**

---

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

---

**September 09, 2014    10:30 AM      Jury Trial - FIRM**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:** Janie Olsen

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Crawford, Vaughn A.	Attorney
	Lawrence, Larry W.	Attorney
	Schutttert, Jay J.	Attorney

**JOURNAL ENTRIES**

- Rick Garcia and Jody Mask appearing Pro Hoc Vice with Plaintiff. Mike Eady appearing Pro Hoc Vice with Defendant Ford Motor Co.

OUTSIDE THE PRESENCE OF THE JURY. Colloquy regarding exhibits. IN THE PRESENCE OF THE JURY. Testimony and exhibits presented per worksheet. Evening recess. MATTER CONTINUED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**September 10, 2014**

---

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

---

**September 10, 2014    10:00 AM      Jury Trial - FIRM**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:** Janie Olsen

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Crawford, Vaughn A.	Attorney
	Lawrence, Larry W.	Attorney
	Schutttert, Jay J.	Attorney

**JOURNAL ENTRIES**

- Rick Garcia and Jody Mask appearing Pro Hoc Vice for Plaintiff. Mike Eady appearing Pro Hoc Vice for Defendant.

OUTSIDE THE PRESENCE OF THE JURY. Colloquy regarding exhibits. IN THE PRESENCE OF THE JURY. Testimony and exhibits presented per worksheet. Evening recess. MATTER CONTINUED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**September 11, 2014**

---

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

---

**September 11, 2014    10:00 AM      Jury Trial - FIRM**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:** Janie Olsen

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Crawford, Vaughn A.	Attorney
	Killip, Jr., William R.	Attorney
	Lawrence, Larry W.	Attorney
	Schuttert, Jay J.	Attorney

**JOURNAL ENTRIES**

- Rich Garcia and Jody Mask appearing Pro Hoc Vice for Plaintiff. Mike Eady appearing Pro Hoc Vice for Defendant.

IN THE PRESENCE OF THE JURY. Testimony and exhibits presented per worksheet. Evening recess.  
MATTER CONTINUED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

## Product Liability

## COURT MINUTES

September 12, 2014

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

**September 12, 2014      9:30 AM      Jury Trial - FIRM**

**HEARD BY:** Adair, Valerie

**COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:** Janie Olsen

**REPORTER:**

## PARTIES

**PRESENT:** Crawford, Vaughn A. Attorney  
Lawrence, Larry W. Attorney  
Schuttert, Jay J. Attorney

## JOURNAL ENTRIES

- Rick Garcia and Jody Mask appearing Pro Hoc Vice with Plaintiff Mike Eady appearing Pro Hoc Vice with Defendant.

OUTSIDE THE PRESENCE OF THE JURY. Colloquy regarding exhibits. IN THE PRESENCE OF THE JURY. Testimony and exhibits presented per worksheet. OUTSIDE THE PRESENCE OF THE JURY. Mr. Mask stated that his people are ready to transport the "buck" back to Texas; Plaintiff is requested that it stay in case they want to use it in their case in chief. Mr. Crawford stated that in his years of practice, he has never heard of a party taking away a demonstrative exhibit before the defense has a chance to use it. Mr. Mask informed the Court that Ford Motor Co. had a chance to review the exhibit before the trial and they didn't do it. The Court stated that it has to evaluate the fairness; never had a trial where this was an issue. COURT ORDERED, demonstrative exhibit is to remain and Mr. Crawford will pay the costs for the return.

Eugene Ross Zumwalt questioned OUTSIDE THE PRESENCE OF THE JURY. COURT FINDS, he



may testify to what is in his autopsy report. The Court believes he is credible. The Court does not believe he is changing his position or changing his testimony for one side or the other. Evening recess. MATTER CONTINUED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

## Product Liability

## COURT MINUTES

**September 15, 2014**

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

**September 15, 2014      9:00 AM      Jury Trial - FIRM**

**HEARD BY:** Adair, Valerie **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:** Janie Olsen

**REPORTER:**

## PARTIES

**PRESENT:** Crawford, Vaughn A. Attorney  
Killip, Jr., William R. Attorney  
Lawrence, Larry W. Attorney  
Schuttert, Jay J. Attorney

## JOURNAL ENTRIES

- Rick Garcia and Jody Mask appearing Pro Hac Vice for the Plaintiff. Mike Eady appearing Pro Had Vice for Defendant.

OUTSIDE THE PRESENCE OF THE JURY. Discussion regarding admission and opposition to admitting certain documents.

IN THE PRESENCE OF THE JURY. Plaintiff RESTED. Testimony and exhibits presented per worksheet.

Evening recess. MATTER CONTINUED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**September 16, 2014**

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A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

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**September 16, 2014    10:30 AM      Jury Trial - FIRM**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:** Janie Olsen

**REPORTER:**

**PARTIES**

**PRESENT:**      Crawford, Vaughn A.      Attorney  
                 Killip, Jr., William R.      Attorney  
                 Lawrence, Larry W.      Attorney  
                 Schuttert, Jay J.      Attorney

**JOURNAL ENTRIES**

- Rick Garcia and Jody Mask appearing Pro Hac Vice for the plaintiff; Mike Eady appearing Pro Hac Vice for the defendant.

IN THE PRESENCE OF THE JURY. Testimony and exhibits presented per worksheet. OUTSIDE THE PRESENCE OF THE JURY. Mr. Crawford argued that counsel for the plaintiff opened the door on the negligence issue; this came up in the Plaintiff's Motion in Limine regarding the strict liability theory, He cited the Young and Long and GM vs. 8th Judicial Court cases, which entitles him to bring up comparative negligence. COURT FINDS, the door was not opened as to Ms. Trejo; she did not testify to much about anything. Mr. Mask suggested that counsel try to work out this issue on the break. COURT SO ORDERED. MATTER RECALLED. Mr. Mask stated they decided to proceed on strict liability and drop the negligent design claim. COURT ORDERED, the trial will proceed on the issue of strict liability. IN THE PRESENCE OF THE JURY. Testimony and exhibits presented per worksheet. Evening recess. MATTER CONTINUED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**September 17, 2014**

---

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

---

**September 17, 2014    10:00 AM      Jury Trial - FIRM**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:** Janie Olsen

**REPORTER:**

**PARTIES**

**PRESENT:**      Crawford, Vaughn A.      Attorney  
Lawrence, Larry W.      Attorney  
Schutttert, Jay J.      Attorney

**JOURNAL ENTRIES**

- Rick Garcia and Jody Mask appearing Pro Hac Vice for the Plaintiff. Mike Eady appearing Pro Hac Vice for defendant.

OUTSIDE THE PRESENCE OF THE JURY. Colloquy regard scheduling and alternate jurors.

IN THE PRESENCE OF THE JURY. Testimony and exhibits presented per worksheet.  
Evening recess. MATTER CONTINUED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**September 18, 2014**

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A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

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**September 18, 2014    10:30 AM      Jury Trial - FIRM**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:** Janie Olsen

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Crawford, Vaughn A.	Attorney
	Killip, Jr., William R.	Attorney
	Lawrence, Larry W.	Attorney
	Mask, Jody R.	Attorney
	Schuttert, Jay J.	Attorney

**JOURNAL ENTRIES**

- OUTSIDE THE PRESENCE OF THE JURY. Testimony and exhibits per worksheet. Colloquy regarding testimony of Leigh. The COURT FINDS the loop was not opened with that testimony; changes in technology may contradict the Weaver memorandum. COURT ORDERED, the Weaver memorandum is too remote in time, therefore does not open the door. Colloquy regarding "safety cell." COURT FINDS, the issue was cleared up by Ford and plaintiff's exhibit #53. Colloquy regarding exhibits. The Court informed counsel that jury instructions will be settled on Friday, with closing arguments on Monday. Additionally, the Court informed counsel that jurors 2, 3 & 7 will be the alternates. Evening recess. MATTER CONTINUED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

## Product Liability

## COURT MINUTES

September 19, 2014

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

**September 19, 2014      9:00 AM      Jury Trial - FIRM**

**HEARD BY:** Adair, Valerie

**COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:** Janie Olsen

**REPORTER:**

## PARTIES

**PRESENT:** Crawford, Vaughn A. Attorney  
Killip, Jr., William R. Attorney  
Lawrence, Larry W. Attorney  
Mask, Jody R. Attorney  
Schuttert, Jay J. Attorney

## JOURNAL ENTRIES

- IN THE PRESENCE OF THE JURY. Testimony and exhibits presented per worksheet. Defendant Ford Motor Company RESTED. OUTSIDE THE PRESENCE OF THE JURY. Jury Instructions settled on the record. Colloquy regarding exhibits. Counsel agreed upon the Special Verdict Form. Oral motion by the defense for judgment as a matter of law. COURT FINDS, there was more than an abundance of evidence to provide to the jury. Evening recess. MATTER CONTINUED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

## Product Liability

## COURT MINUTES

September 22, 2014

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

**September 22, 2014      9:30 AM      Jury Trial - FIRM**

**HEARD BY:** Adair, Valerie

**COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:** Janie Olsen

**REPORTER:**

## PARTIES

**PRESENT:** Crawford, Vaughn A. Attorney  
Killip, Jr., William R. Attorney  
Lawrence, Larry W. Attorney  
Mask, Jody R. Attorney  
Schuttert, Jay J. Attorney

## JOURNAL ENTRIES

- IN THE PRESENCE OF THE JURY. Closing arguments by Mr. Mask. Closing arguments by Mr. Vaughn. Rebuttal arguments by Mr. Mast. Officer Hawkes SWORN to take charge of the jury. At the hour of 2:00 PM the jury retired to deliberate. Evening recess. MATTER CONTINUED.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

## Product Liability

## COURT MINUTES

September 23, 2014

A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

**September 23, 2014      9:30 AM      Jury Trial - FIRM**

**HEARD BY:** Adair, Valerie **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:** Janie Olsen

**REPORTER:**

## PARTIES

<b>PRESENT:</b>	Killip, Jr., William R.	Attorney
	Lawrence, Larry W.	Attorney
	Schuttert, Jay J.	Attorney

## JOURNAL ENTRIES

- At the hour of 3:55 pm, the jury returned with a verdict in favor of the Plaintiff and against the Defendant. Jurors polled at the request of Mr. Shuttert. The Court thanked and excused the jurors from service.



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**November 17, 2014**

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A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

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**November 17, 2014      3:00 AM      Motion**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

-

- COURT ORDERED, Defendant Alan Koransky's Motion to Adjudicate Attorney's Lien and Order Granting Costs in Favor of Defendant Alan Koransky is GRANTED.

CLERK'S NOTE: Michael Hall (HALL, JAFFE & CLAYTON) notified by this minute order to prepare the order and notify appropriate parties.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**January 07, 2015**

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A-11-641059-C	Teresa Trejo, Plaintiff(s) vs. Ford Motor Company, Defendant(s)
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**January 07, 2015      9:30 AM      All Pending Motions**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Dania Batiste

**RECORDER:** Janie Olsen

**REPORTER:**

**PARTIES**

<b>PRESENT:</b>	Killip, Jr., William R. Lawrence, Larry W. Mask, Jody R. Schuttert, Jay J.	Attorney Attorney Attorney Attorney
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**JOURNAL ENTRIES**

- PLAINTIFF'S MOTION FOR ATTORNEY FEES AND COSTS.....DEFENDANT FORD MOTOR COMPANY'S RENEWED MOTION FOR JUDGMENT AS A MATTER OF LAW, OR IN THE ALTERNATIVE, FOR A NEW TRIAL.....DEFENDANT FORD MOTOR COMPANY'S MOTION TO RETAX AND SETTLE COSTS AND DISBURSEMENTS.....DEFENDANT'S MOTION TO ASSOCIATE COUNSEL - EMILY V. CUATTO, ESQ.....DEFENDANT'S MOTION TO ASSOCIATE COUNSEL - LISA J. PERROCHET, ESQ.

Also Present: Rick Garcia, Esq.; Mike Eady, Esq.; and Morgan Petrelli, Esq.

Upon the Court's inquiry, Mr. Eady advised that this affidavit came about after the post-trial interview process with the jury and how it reached a verdict; further, the issue is causation, according to the theory of the how Plaintiff's neck was broken. Mr. Eady further advised that there is an absence of evidence that was necessary cause the injury; and the expert incorrectly assumed

something.

Mr. Lawrence stated that the parties spoke with the jurors after the trial; and after this affidavit was brought before this Court, counsel contacted the Foreperson, who provided his version of events, contradicting the initial juror's depiction. Mr. Lawrence argued that this motion fails to address that a resulting crash is not the same as a dynamic crash; further, Plaintiff met the standard with expert testimony and disinterested percipient testimony. Further arguments by counsel.

COURT ORDERED, Defendant Ford Motor Company's Renewed Motion for Judgment as a Matter of Law, or the Alternative, for a New Trial is DENIED; noting there is enough evidence to support the jury's verdict.

Mr. Lawrence cited case law, and argued that the experts were compensated accordingly for preparing for this highly intensive case; additionally, Plaintiff was required to hire them for presentation to the jury. Mr. Lawrence further argued that the statute says to award those costs to the prevailing party.

Court NOTED, an inclination to award the expert fees, as this was a technically and scientifically complicated case; and the fees of \$300.00 an hour are reasonable.

COURT ORDERED, motions are CONTINUED to a Chambers calendar for decision; Court will assess the fees and figure the costs based on the motion from the defense in some of the areas.

1/12/2015 3:00 am (Chambers Calendar) Plaintiff's Motion for Attorney Fees and Costs.....Defendant Ford Motor Company's Motion to Retax and Settle Costs and Disbursements

CLERK'S NOTE: Following hearing COURT ORDERED, DEFENDANT'S MOTION TO ASSOCIATE COUNSEL - EMILY V. CUATTO, ESQ.....DEFENDANT'S MOTION TO ASSOCIATE COUNSEL - LISA J. PERROCHET, ESQ. are GRANTED. dh

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**January 12, 2015**

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A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

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**January 12, 2015      3:00 AM      All Pending Motions**

**HEARD BY:** Adair, Valerie      **COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- DEFENDANT FORD MOTOR COMPANY'S MOTION TO RETAX AND SETTLE COSTS AND  
DISBURSEMENTS...PLAINTIFF'S MOTION FOR ATTORNEY FEES AND COSTS

COURT ORDERED, matter CONTINUED for DECISION.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Product Liability**

**COURT MINUTES**

**February 18, 2015**

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A-11-641059-C      Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant(s)

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<b>February 18, 2015</b>	<b>3:00 PM</b>	<b>Decision</b>	<b>Defendant Ford Motor Co's Motion to Retax and Settle Costs and Disbursements..Pltf's Motion for Attorney Fees and Costs</b>
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**HEARD BY:** Adair, Valerie

**COURTROOM:** RJC Courtroom 11C

**COURT CLERK:** Denise Husted

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- Decision:

DEFENDANT FORD MOTOR COMPANY'S MOTION TO RETAX AND SETTLE COSTS AND  
DISBURSEMENTS...PLAINTIFF'S MOTION FOR ATTORNEY FEES AND COSTS

COURT ORDERED, Plaintiff's Motion for Attorney Fees and Costs are GRANTED IN PART and  
DENIED IN PART. Costs relating to expert Brian Herbst are reduced in the amount of \$19,400.88.  
Costs for expert Danal Stevens are reduced by \$826.98. Costs for expert Keith Fairchild are reduced  
by \$5,160.91. Costs for out of state counsel's travel will not be rewarded; total costs for attorney's  
travel are limited to \$3019.61. Costs are further reduced by \$2,004.60; the remainder of the costs are  
awarded. Pre-judgment interest awarded in the amount of \$11,434.93. Plaintiff's Application for

PRINT DATE: 04/20/2015

Page 34 of 35

Minutes Date: August 01, 2011

Attorney Fees is DENIED. The Court weighs the Beattie factors as follows:

COURT FINDS, the claim was brought in good faith and the offer of judgment was reasonable. COURT FINDS, defendant's decision to reflect the offer was reasonable given the fact that there was a strong likelihood that defendants would prevail on the issue of liability. Also, even if the jury found in favor of the plaintiff, there was a substantial likelihood that damages would be less than the \$2,250,000.00 offer of judgment. The fees sought based on an hourly rate are reasonable in amount but the fees based on a forty percent contingency rate are high.

COURT FURTHER ORDERED, Defendant Ford Motor Company's Renewed Motion for Judgment as a Matter of Law is DENIED.

CLERK'S NOTE: Copies of this minute order placed in the attorney folders of:

William Killip (NETTLES LAW FIRM)  
Vaughan Crawford (SNELL & WILMER)

# Exhibit List

Case: A-11-641059-C Party: Sort Order: Status Case Teresa Trejo, Plaintiff(s)  
vs.  
Ford Motor Company, Defendant (s)

Exhibit ID	On Behalf Of	Status/Date	Return/Destroy Date	Type and Description	Exhibit Flag	Source	In Custody Of	Location
*LOCATIO N*	Other		Destroy 01/30/2017	ENVELOPES SHELF ( 1 ) : BOX UNIT BIN 360 (1)		Estate of Rafael Trejo	Department 21 01/30/2015	Evidence Vault
Non- evidence	Defendant	Admitted 08/12/2014	Destroy 01/22/2017	Media Defendant's Ford Motor Company's Notice or Manual Filing		Crawford, Vaughn A.		
1	Plaintiff	Admitted 09/14/2014	Destroy 02/05/2017	Document New Nexuci Dept of Public Safety records		Marshall, Eric L.		
Comment: for complete list see attached list								

# **PLAINTIFF'S TRIAL EXHIBIT LIST**

PLTF: Teresa Garcia Trejo  
 DEF: Ford Motor Company

PLAINTIFF'S ATTORNEYS: R. Garcia & L. Lawrence  
 DEFENDANT'S ATTORNEYS: V. Crawford, J. Schuffert & J. Cools

CASE NO. A-11-641059-C

Dept. No.: XXI

DATE: 08/21/2014

No.	Description of Exhibits	Date Offered	Objection	Date Admitted
1-7	New Mexico Department of Public Safety Records	9/11	no	9/11
2	New Mexico Department of Public Safety Photographs Taken December 16, 2009	9/10	no opo	9/10/14
3	New Mexico Department of Public Safety 911 call recordings			
4	New Mexico Office of the Medical Investigator Records 8-14, 19, 23, 24, 25, 26, 28	9/15	opo	<del>9/15</del> 9/15/15
5	New Mexico Office of the Medical Investigator Photos (20 images)	9/15	no	9/15 - Photos only
6	Ford Roof Strength Study "Weaver Memo"	9/10	obj	
7	Ford Safety Design Guidelines for New Vehicles, 1998	9/10	obj	9/10/14
8	Ford Regulatory Engineering Design Standards, 1997			
9	Drawings, specs, and engineering drawings applicable to the roof structure of the 2000 Ford Excursion			
10	News releases pertaining to the 2000 Excursion			
11	Sun visor Label on 2000 Excursion			
12	Four Wheeling Owner Guide Supplement for 2000 Excursion, "Four Wheeling with Ford"	9/10	no	9/10/14
13	Owner Guide for 2000 Excursion	9/10	no	9/10/14
14	Excursion showroom brochure	9/10	obj	9/10/14
15	Excursion Section from the 2000 Ford SUV Source Book			
16	<b>EXHIBIT WITHDRAWN</b>			
17	Customer contacts, if any, received on or before January 1, 2013, regarding a rollover of U137 Excursion			
18	Ford U137 Roof Crush Study	9/10	obj	9/10/14
19	Meeting minutes regarding the U137 Excursion Documents and Privilege Log for Meetings Minutes			
20	<b>EXHIBIT WITHDRAWN</b>			
21	PowerPoint presentation regarding the U137 roof			
22	Finite Element Analysis or computer simulations of the roof structure of U137 Ford Excursion			
23	<b>EXHIBIT WITHDRAWN</b>			



No.	Description of Exhibits	Date Offered	Objection	Date Admitted
24	Roof Drawing and specifications for a 1998 MY Excursion			
25	2000 Excursion Ideas Files	<del>9/22</del>	<del>no</del>	<del>9/22</del>
26	Safety Cage Design in Volvo XC90 Presentation	9/22	no	9/22
27	EXHIBIT WITHDRAWN	<del>9/22</del>	<del>no</del>	<del>9/22</del>
28	Michael Leigh Deposition, Parr v. Ford 7-29-11			
29	Michael Leigh Trial Testimony, Parr v. Ford 3-7-2012			
30	"Ford Knows Roof Strength Saves Lives" Timeline prepared by B. Herbst with supporting reference documents.		obj	
31	Excursion Marketing Photos (4 images)	9/9	no	9/10/14
32	Brian Herbst's Report of June 7 2013, with reference materials attached			
33	Figures (1-23) & Tables (1-7) from Brian Herbst's Report of June 7 2013	9/10	no	9/10/14
34	S.A.F.E. 2000 Excursion Production and Reinforced Drop Tests Videos & Photos	9/10	no	9/10/14
35	Don Stevens Report of June 7, 2013 with references attached			
36	Figures (1-22) from Don Stevens Report of June 7, 2013	9/12	no	9/12/14
37	Don Stevens affidavit, including illustrations, charts, photos of July 24, 2014	9/12	no	9/12/14
38	Joe Peles Report of June 7, 2013 with references attached			
39	Joe Peles Power Point Slides (139 slides)	9/12	obj	
40	Joe Peles Supplemental Report of August 7, 2013 with references attached			
41	Joe Peles Second Supplemental report of July 30, 2014 with references attached			
42	Joe Peles Supplemental Power Point (8 slides)	✓	obj	
43	Pintar – Mechanisms of Hyperflexion Cervical Spine Injury	✓		
44	Conroy (2007) – Fatal positional asphyxia associated with rollover crashes	✓	no	
45	Eken (2009) – Traumatic asphyxia a rare syndrome in trauma patients	✓	no	
46	James (2001) – Asphyxiation from shoulder seat belts			
47	Prahlw (2010) – Asphyxial Deaths			
48	Keith Fairchild, Assessment of Pecuniary Losses with Attachments	9/22	no	9/22
49	2010 U.S. Federal Income Tax Returns, Teresa & Rafael Trejo			
50	The Venetian/The Palazzo Employment Records Pertaining to Rafael Trejo	9/12	obj	

No.	Description of Exhibits	Date Offered	Objection	Date Admitted
51	Teresa Trejo Family Photos and Mementos (11 pages)			✓
52	Teresa & Rafael Trejo Wedding Videos (2)			

Trejo v. Ford

Defendant Ford Exhibits- A641059

<u>Exhibit #</u>	<u>Description</u>	<u>Offered</u>	<u>Objection</u>	<u>Admitted</u>	<u>Witness</u>
1-0007	Police Scene Diagram	9/11/2014	None	9/11/2014	Stevens
50-0128	Death Certificate	9/15/2014	Obj to context of ME file	9/15/2014	Zumwalt
1001-0009	Medical Examiner Injury Diagram	9/15/2014	Obj to context of ME file	Pending Judge review of entire ME file 9/22/14	Zumwalt
1001-0028	Death Certificate Work Sheet	9/15/2014	Obj to context of ME file	Pending Judge review of entire ME file 9/22/14	Zumwalt
1011-0473; 0479; 0298; 0437	Todd Hoover Scene Inspection Photographs	no copy	obj	obj	Hoover
1012-0042; 0044; 0052; 0109; 0177; 0198; 0405; 0639; 0685; 0705; 0713; 0819; 0823	Todd Hoover Vehicle Inspection Photographs	9/11/2014	None	Admitted 0044 and 0052 on 9/11/14	Hoover/ Stevens

Trejo v. Ford

Defendant Ford Exhibits- A641059

✓ 1013-0137; 0144	Todd Hoover Vehicle Inspection Photographs		no opp	9/22	Hoover
✓ 1014-0422; 0429; 0473; 0477	Jarrod Carter Vehicle Inspection Photographs		no opp	9/22	Carter
✓ 1015-0099; 0102; 0115; 0145; 0287; 0295; 0341; 0343	Eddie Cooper Vehicle Inspection Photographs		no opp	9/22	Cooper
✓ 1016-0277	Jeff Croteau Vehicle Inspection Photograph		no opp	9/22	Croteau
✓ 1018-0003; 0009; 0130; 0223; 0257; 0608; 0617	Don Stevens Vehicle Inspection Photographs		no opp	9/22	Hoover/ Stevens
✓ 1083-0002; 0004	AR Diagram (Boards)		no opp	9/22	Hoover
✓ 1085-0003 thru 0004; 0014 thru 0022	3D Scaled Accident Reconstruction Still Simulation Diagrams		no opp	9/22	Hoover
✓ 1086-0001	Scene Diagram (Board)		no opp	9/22	Hoover
✓ 1087	Profile at crash scene of evidence related to crash		no opp	9/22	Hoover
✓ 1088-0001	Google Earth Scene Image		no opp	9/22	Hoover
✓ 1092A-0001	Scratch Pattern Analysis- Overall (Board)		no opp	9/22	Hoover

Trejo v. Ford

Defendant Ford Exhibits- A641059

1092B-0002	Scratch Pattern Analysis- Passenger's Side (Board)		no oppo	9/22	Hoover
1092C-0001	Scratch Pattern Analysis- Driver's Side (Board)				Hoover
1092D-0001	Scratch Pattern Analysis- Hood & Roof (Board)				Hoover
1093A-0001	Vehicle Damage Analysis- Overall				Hoover
1093B-0001 thru 0002	Vehicle Damage Analysis- Suspension				Hoover
1093C-0001 thru 0006	Vehicle Damage Analysis- Tires				Hoover
1094-0001; 0003 thru 0007; 0009 thru 0011	Trailer Damage Analysis				Hoover
1109	Paper - Compressive Neck Injury and its Relationship to Head Contact and Torso Motion during Vehicle Rollovers, SAE #2009-01-0829				Croten
1116	Overlay Drawings of Plaintiff's Expert Stevens Accident Reconstruction (Boards)				Hoover
1118-0001; 0002; 0004	Photographs of Ford Excursion Model with Scratch Patterns		oppo	not admit	Hoover

Trejo v. Ford

Defendant Ford Exhibits- A641059

1119A-0004; 0005	Roll Rate Analysis- Calculations & Graph				Hoover
1119B-0002	Center of Gravity Dimensions			7/10/08	Hoover
1125A and B	Animations- Occupant Motion in the Global Reference Frame				Carter
1126-0001 thru 0007; 0009	Diagrams demonstrating head/neck motion/deformation associated with cervical spinal fracture dislocations				Carter
1127	Diagrams demonstrating the mechanics of torso augmentation associated with cervical fracture dislocations				Carter
1128	Diagrams representing roof deformation for an upright and inverted vehicle				Carter
1176	Moffatt, E., et al., Matched-pair Rollover Impacts of Rollcaged and Production Roof Cars Using the Controlled Rollover Impact System (CRIS). SAE Paper - 2003-01-0172				Carter
1180	Moffatt, E.A. and M.B. James, Headroom, roof crush, and belted excursion in rollovers. SAE Paper - 2005-01-0942				Cooper
1204	Parker, D.D., et al., Rollover Severity and Occupant Protection - A Review of NASS/CDS Data. SAE Paper - 2007-01-0676				Carter
1210-0054	Seat Belt Diagrams				Cooper

Trejo v. Ford

Defendant Ford Exhibits- A641059

✓ 1213-0003	Belt Schematics		4/10 09/12	Cooper
1215A-0005; 0006; 0008; <del>0007</del> ; 0023; 0025; 0026; 0033; 0035; 0036; 0037.	Surrogate Inversion Demonstration at Exponent on May 5, 2014		✓	Cooper
1215B-0006; 0022; 0032; 0039; 0044; 0045; 0050; 0054; 0079	Photos- Surrogate Inversion Demonstration at Exponent on May 5, 2014		✓	Cooper
1286	Subject 2000 Ford Excursion (photographs and vehicle information)		✓	Croteau
1288	Roof Deformation (table and photographs)		✓	Croteau
1290	Crash Type Comparison		✓	Croteau
1291	Horizontal platen tests of peer SUV's (photographs, annotations, and graph)	09/12	4/12/12	Croteau
1292	Ford Excursion Roof Structure Components	4/10 09/12	9/12/12	Croteau
1293-0004	Interior photograph of Excursion displaying roof and upper body sheet metal components		✓	Croteau
1296-0004	Presentation showing interior photos of a detrimmed Excursion and F-250 (photographs, annotations, measurements)		✓	Croteau
1298	Rollover Test Methodologies		✓	Croteau
1305	Graph showing Load v. Deflection data for A-Pillar Roof Crush Tests Ford F-250 Regular and Super Cab		✓	Croteau
1308-0005 thru 0008	Trejo Occupant Kinematics and Drop Height presentation		✓	Croteau
1311-0032	Roof Analysis Presentation		✓	Croteau

Trejo v. Ford

Defendant Ford Exhibits- A641059

1335-0053	Structural Safety Status Chart from "Analytical Sign-Off for PHN-131 CP Design", dated April 1996			4/20/96		Leigh
1386	Photos- Horizontal Platen Roof Crush Test 2000 Ford Excursion, "TEC0901364, March 5, 2009 (Croteau Slide 77)					Croteau
1401-0217	Exponent Report, TEC1105991, Inverted Vehicle Drop Test 2001 Ford Excursion with a Reinforced Roof, August 24, 2011					Croteau
1403	Video screen shots of Synchronized Data (incl Roof Displacement)- TEC1105991, Inverted Vehicle Drop Test 2001 Ford Excursion with a Reinforced Roof, August 24, 2011					Croteau
1406	CRIS Flash Video Presentation					Croteau
1408	Video of CVRP with cables					Croteau
1409	Video of CVRP with no cables					Croteau
1410	Video of Real Time Front Panning View, Tests 1-4					Croteau
1412-0002; 0009; 0018; 0019	CVRP Presentation - CRIS Matched-Pair Rollover Impacts					Croteau
1413	Video CVRP - Test 1 Side & Front Views with Data					Croteau
1415	Video CVRP - Side & Front Views with Data					Croteau
1416	Video CVRP - Comparison of Tests 1 and 4 with Data					Croteau



Trejo v. Ford

Defendant Ford Exhibits- A641059

1424	Video Isuzu Rodeo CRIS Test - Description of Testing		<i>no opp</i>	<i>9/22</i>	Croteau
1429	Exponent Video, Side View from Trailer, Controlled Rollover Impact System (CRIS) Test, 1996 Isuzu Rodeo with Modified Roof, TEC0703258, dated January 19, 2008		<i>1</i>	<i>1</i>	Croteau
1431-0033; 0036; 0040; 0041	CRIS Presentation - Compressive Neck Injury and its Relationship to Head Contact and Torso Motion During Vehicle Rollovers		<i>1</i>	<i>1</i>	Croteau
1432	CRIS Presentation Video - High Speed Panning View of Isuzu Rodeo CRIS		<i>1</i>	<i>1</i>	Croteau
1434	CRIS Presentation Video - Synchronized Data and Video of Isuzu Rodeo CRIS		<i>1</i>	<i>1</i>	Croteau
1438	Rollover - Total Head Force Graphic		<i>1</i>	<i>1</i>	Croteau
1443-0001; 0073; 0085; 0086	Forester DRT Research Exhibits	<i>9/22</i>	<i>opp</i>		Croteau
1444-0001	Comparison of Subaru Forester DRT with braking	<i>9/22</i>	<i>opp</i>		Croteau
1445-0007; 0008; 0211	Exponent Report, Dolly Rollover Test on Dirt, 2003 Subaru Forester, dated August 1, 2007	<i>9/22</i>	<i>opp</i>	<i>✓</i>	Croteau

Trejo v. Ford

Defendant Ford Exhibits- A641059

1448	Synchronized Data and Video, Left and Right A-Pillar Displacement v Time, Front Panning High Speed Video, Interior Left and Right High Speed Videos, Dolly Rollover Test on Dirt, 2003 Subaru Forester, dated August 1, 2007	9/22	opp	9/22	Croteau
1455-0245	Exponent Report, Dolly Rollover Test on Dirt with ATDs, 2003 Subaru Forester, dated August 11, 2008	9/22	opp	9/22	Croteau
1457	Front Panning Real Time Video, Dolly Rollover Test on Dirt with ATDs, 2003 Subaru Forester, dated August 11, 2008	9/22	opp	9/22	Croteau
1461	Synchronized Data and Video/Screen Shots (Impact 1), Driver ATD Vertical Upper Neck Force (Newtons) v Time, Left B-Pillar Displacement v Time, Front Panning High Speed Video, Interior Rear View of Driver ATD High Speed Video, Dolly Rollover Test on Dirt with ATDs, 2003 Subaru Forester, dated August 11, 2008	9/22	opp	9/22	Croteau
1491	Animation- Rotational Constraint	9/22	opp		Bennett
1492	Animation- Unconstrained Flexion	9/22	opp		Bennett

Court's EXHIBITS

CASE NO. A641059

[illegible]

# Certification of Copy

State of Nevada }  
County of Clark } SS:

I, Steven D. Grierson, the Clerk of the Court of the Eighth Judicial District Court, Clark County, State of Nevada, does hereby certify that the foregoing is a true, full and correct copy of the hereinafter stated original document(s):

NOTICE OF APPEAL; DEFENDANT FORD MOTOR COMPANY'S CASE  
APPEAL STATEMENT; NOTICE OF POSTING SUPERSEDEAS BOND AND STAY OF  
EXECUTION OF JUDGMENT; DISTRICT COURT DOCKET ENTRIES; CIVIL COVER SHEET;  
JUDGMENT UPON JURY VERDICT; NOTICE OF ENTRY OF JUDGMENT UPON JURY  
VERDICT; ORDER; NOTICE OF ENTRY OF ORDER; DISTRICT COURT MINUTES; EXHIBITS  
LIST

TERESA GARCIA TREJO as the Successor-in-  
Interest and Surviving Spouse of Rafael Trejo,  
Deceased,

Plaintiff(s),

vs.

FORD MOTOR COMPANY,

Defendant(s),

Case No: A641059

Dept No: XXI

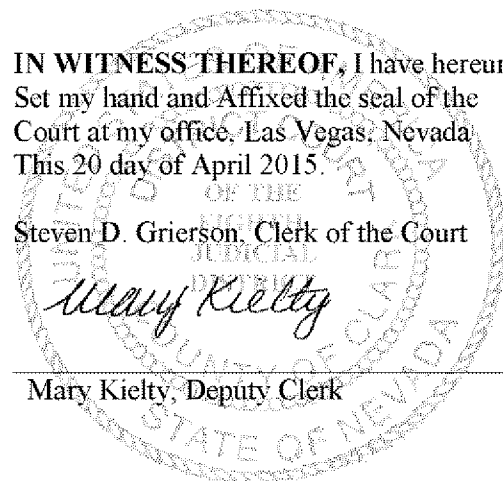
now on file and of record in this office.

IN WITNESS THEREOF, I have hereunto  
Set my hand and Affixed the seal of the  
Court at my office, Las Vegas, Nevada  
This 20 day of April 2015.

Steven D. Grierson, Clerk of the Court



Mary Kielty, Deputy Clerk



15757

**Snell & Wilmer L.L.P.**  
Las Vegas Operating Account  
Hughes Center  
Las Vegas, NV 89169-5958

Wells Fargo Bank, N.A.  
Las Vegas, NV 89109

Date: April 15, 2015

94-7074-3212

Pay: Two hundred fifty and 00/100 \*\*\*\*\* \$ \*\*\*250.00\*\*\*

PAY  
TO THE Clerk of the Supreme Court  
ORDER OF:



Void after 90 days

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4508323013⑈

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