

**THE SUPREME COURT
OF THE STATE OF NEVADA**

Electronically Filed
Aug 09 2016 04:15 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

FORD MOTOR COMPANY,

Appellant,

v.

THERESA GARCIA TREJO AS THE
SUCCESSOR-IN-INTEREST AND
SURVIVING SPOUSE OF RAFAEL
TREJO, DECEASED,

Respondent.

Supreme Court Case No. 67843

APPEAL FROM THE EIGHTH JUDICIAL DISTRICT, COUNTY OF CLARK
THE HONORABLE VALERIE ADAIR, DISTRICT JUDGE
DISTRICT COURT CASE No. A-11-641059-C

**REQUEST REGARDING SCHEDULING
OF ORAL ARGUMENT**

HORVITZ & LEVY LLP

LISA PERROCHET (*PRO HAC VICE*)
EMILY V. CUATTO (*PRO HAC VICE*)
3601 WEST OLIVE AVENUE, 8TH FLOOR
BURBANK, CALIFORNIA 91505-4681
(818) 995-0800 • FAX: (844) 497-6592
lperrochet@horvitzlevy.com
ecuatto@horvitzlevy.com

SNELL & WILMER L.L.P.

VAUGHN A. CRAWFORD (SBN 7665)
JAY J. SCHUTTERT (SBN 8656)
MORGAN T. PETRELLI (SBN 13221)
3883 HOWARD HUGHES PARKWAY,
SUITE 1100
LAS VEGAS, NEVADA 89169
(702) 784-5200 • FAX: (702) 784-5252
vcrawford@swlaw.com
jschuttert@swlaw.com
mpetrelli@swlaw.com

THOMPSON COE COUSINS & IRONS, L.L.P.

MICHAEL W. EADY (*PRO HAC VICE*)
701 BRAZOS STREET, 15TH FLOOR
AUSTIN, TEXAS 78701
(512) 708-8200 • FAX: (512) 708-8777
meady@thompsoncoe.com

ATTORNEYS FOR APPELLANT
FORD MOTOR COMPANY

**THE SUPREME COURT
OF THE STATE OF NEVADA**

FORD MOTOR COMPANY,
Appellant,

v.

THERESA GARCIA TREJO AS THE
SUCCESSOR-IN-INTEREST AND
SURVIVING SPOUSE OF RAFAEL
TREJO, DECEASED,
Respondent.

Supreme Court Case No. 67843

**REQUEST REGARDING SCHEDULING
OF ORAL ARGUMENT**

Briefing in this appeal was completed on April 11, 2016. On August 3, 2016, this court issued an order stating that oral argument might assist the court in resolving this appeal and that accordingly, oral argument will be scheduled for the next available calendar.

Emily Cuatto is the attorney primarily responsible for reviewing the appellate record, conducting the legal research, and writing the appellant's opening and reply briefs on behalf of appellant Ford Motor Company. However, Ms. Cuatto is on maternity leave. She plans to return to work in early December 2016.

Ms. Cuatto is the attorney who will be best able to assist the court at argument in understanding Ford's arguments. Therefore, on behalf of defendant and appellant Ford Motor Company, I respectfully request that the court not set oral argument before the January 2017 calendar so that Ms. Cuatto will be available to appear on behalf of Ford.

Thank you for your consideration.

Dated: August 8, 2016

HORVITZ & LEVY LLP

LISA PERROCHET (*Pro Hac Vice*)

EMILY V. CUATTO (*Pro Hac Vice*)

SNELL & WILMER L.L.P.

VAUGHN A. CRAWFORD (Nevada SBN 7665)

JAY J. SCHUTTERT (Nevada SBN 8656)

MORGAN T. PETRELLI (Nevada SBN 13221)

THOMPSON COE COUSINS & IRONS, L.L.P.

MICHAEL W. EADY (*Pro Hac Vice*)

By: s/Lisa Perrochet

Lisa Perrochet

Horvitz & Levy LLP

3601 West Olive Avenue, 8th Floor

Burbank, California 91505-4681

Attorneys for Appellant

FORD MOTOR COMPANY

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 3601 West Olive Avenue, 8th Floor, Burbank, California 91505-4681.

On August 8, 2016, I served true copies of the following document(s) described as **REQUEST REGARDING SCHEDULING OF ORAL ARGUMENT** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the indicated persons at the addresses listed in the Service List and placed the package for collection and mailing, following our ordinary business practices. I am readily familiar with Horvitz & Levy LLP's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

BY ELECTRONIC TRANSMISSION: Based on electronic transmission via the Nevada Supreme Court's Appellate Case Management System (ACMS) indicated as follows:

SEE ATTACHED SERVICE LIST

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 8, 2016, at Encino, California.

s/ Robyn Whelan

SERVICE LIST

Trejo v. Ford Motor Company
Nevada Supreme Court No. 67843

Attorneys	Party(s) Represented
Jay J. Schuttert Morgan T. Petrelli Snell & Wilmer LLP 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, Nevada 89169	Appellant <i>Ford Motor Company</i> Electronic Copy, via Nevada Supreme Court's Appellate Case Management System (ACMS)
Vaughn A. Crawford Snell & Wilmer LLP 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, Nevada 89169	Appellant <i>Ford Motor Company</i> Hard copy, via U.S. Mail
Michael W. Eady Thompson Coe Cousins & Irons, LLP 701 Brazos Street, 15th Floor Austin, Texas 78701	Appellant <i>Ford Motor Company</i> Hard copy, via U.S. Mail
Brian D. Nettles William R. Killip, Jr. Nettles Law Firm 1389 Galleria Drive, Suite 200 Henderson, Nevada 89014	Respondent <i>Teresa Garcia Trejo</i> Electronic Copy, via Nevada Supreme Court's Appellate Case Management System (ACMS)
Ricardo A. Garcia Jody R. Mask Garcia Ochoa Mask 820 South Main Street McAllen, Texas 78501	Respondent <i>Teresa Garcia Trejo</i> Hard copy, via U.S. Mail
Larry W. Lawrence, Jr. Lawrence Law Firm 3112 Windsor Road, Suite A234 Austin, Texas 78703	Respondent <i>Teresa Garcia Trejo</i> Hard copy, via U.S. Mail

A. William Maupin, Esq. Jennifer L. Braster Naylor & Braster 1050 Indigo Drive, Suite 112 Las Vegas, Nevada 89145	Respondent <i>Teresa Garcia Trejo</i> Electronic Copy, via Nevada Supreme Court's Appellate Case Management System (ACMS)
David N. Frederick, Esq. 43 Innisbrook Avenue Las Vegas, Nevada 89113	Respondent <i>Teresa Garcia Trejo</i> Electronic Copy via Nevada Supreme Court's Appellate Case Management System (ACMS)
Beau Sterling Sterling Law, LLC 228 South 4th Street, 1st Floor Las Vegas, Nevada 89101	Respondent <i>Teresa Garcia Trejo</i> Electronic Copy via Nevada Supreme Court's Appellate Case Management System (ACMS)
Dennis L. Kennedy Sarah E. Harmon Bailey ♦ Kennedy 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302	<i>Amicus Curiae</i> <i>The National Association of</i> <i>Manufacturers and Alliance of Automobile</i> <i>Manufacturers, Inc.</i> Electronic Copy via Nevada Supreme Court's Appellate Case Management System (ACMS)
Victor E. Schwartz Shook, Hardy & Bacon L.L.P. 1155 F Street, N.W., Suite 200 Washington, DC 20004-1305	<i>Amicus Curiae</i> <i>The National Association of</i> <i>Manufacturers and Alliance of Automobile</i> <i>Manufacturers, Inc.</i> Hard copy, via U.S. Mail
Robert T. Eglet Erica D. Entsminger Eglet Prince 400 South Seventh Street, 4th Floor Las Vegas, Nevada 89101	<i>Amicus Curiae</i> <i>Nevada Justice Association</i> Hard copy, via U.S. Mail

Matthew L. Sharp Matthew L. Sharp, Ltd. 432 Ridge Street Reno, Nevada 89501	<i>Amicus Curiae</i> <i>Nevada Justice Association</i> Electronic Copy via Nevada Supreme Court's Appellate Case Management System (ACMS)
--	---