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13 Attorneys for Defendants,
14 CUONG CHE, SCOTT STONE, and
15 UNIVERSITY MEDICAL CENTER OF
16 SOUTHERN NEVADA

17 **DISTRICT COURT**
18 **CLARK COUNTY, NEVADA**

19 DOMINADOR M. CORPUZ as natural father
20 of Decedent, DERALL BERNY RAMOS
21 CORPUZ, and as Special Administrator of the
22 Estate of DERALL BERNY RAMOS
23 CORPUZ; and ESTRELITA R. CORPUZ, as
24 natural mother of Decedent, DERALL
25 BERNY RAMOS CORPUZ,

26 Plaintiffs,

27 vs.

28 CUONG CHE; SCOTT STONE;
UNIVERSITY MEDICAL CENTER d/b/a
UNIVERSITY MEDICAL CENTER OF
SOUTHERN NEVADA; DOE
PHARMACIST, I through X; DOE
PHARMACY EMPLOYEE, I through X;
DOE NURSE, I through X; DOE HOSPITAL
EMPLOYEE, I through X; DOE MEDICAL
DOCTOR, I through X; DOES I through X;
ROE PHARMACY, XI through XX; ROE
DISTRIBUTOR, XI through XX; ROE
MANUFACTURER, XI through XX; ROE
RETAILER, XI through XX; ROE
WHOLESALE, X through XX; ROE
HOSPITAL, XI through XX, and ROE
COMPANIES, XI through XX,

Defendants.

CASE NO. A-17-758800-C

DEPT NO. XV

OFFER OF JUDGMENT

1 TO: Plaintiffs, DOMINADOR M. CORPUZ, THE ESTATE OF DERALL BERNY RAMOS
2 CORPUZ, and ESTRELITA R. CORPUZ; and

3 TO: Kimball Jones, Esq., Plaintiffs' attorney of record.

4 Pursuant to NRCP 68, Defendants, CUONG CHE, SCOTT STONE, and UNIVERSITY
5 MEDICAL CENTER OF SOUTHERN NEVADA ("UMC Defendants"), hereby offer to allow
6 judgment to be taken against them jointly and in Plaintiffs' favor to resolve all claims between the
7 Plaintiffs and the UMC Defendants for ONE-HUNDRED THOUSAND AND ONE DOLLARS
8 (\$100,001.00), inclusive of all attorneys' fees, costs, accrued interest, and any other sums that
9 Plaintiffs could claim against the UMC Defendants. If accepted, the amount offered shall
10 constitute full and complete satisfaction of all claims and damages arising from the above-
11 captioned matter. There shall be no separate award of attorneys' fees or costs.

12 This is not an admission of liability, but rather an offer of compromise submitted for the
13 purposes of NRCP 68.

14 DATED this _____ day of _____, 2021.

15 **SALTZMAN MUGAN DUSHOFF**

16
17 By _____
18 MATTHEW T. DUSHOFF, ESQ.
19 Nevada Bar No. 004975
20 WILLIAM A. GONZALES, ESQ.
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27 UNIVERSITY MEDICAL CENTER d/b/a
28 UNIVERSITY MEDICAL CENTER OF
SOUTHERN NEVADA