# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

TIMMY A. TAYLOR and DEBORAH TAYLOR,	)	
Plaintiffs,	)	
vs.	)	No. 4:09-cv-536 HEA
COTTRELL, INC. and AUTO HANDLING, CORP.,	)	Removed from the Circuit Court of St. Louis County, MO (Case No.
Defendants.	)	09SL-CC01525)

#### JOINT STIPULATION OF UNCONTESTED FACTS

COMES NOW Plaintiffs, jointly with Cottrell and Auto Handling Corp., and pursuant to the agreement of the parties, states that the following stipulations of uncontested facts have been made in this matter:

#### **STIPULATIONS OF FACT**

- **1.** Mr. Taylor is 47 years old.
- **2.** Mr. Taylor is a citizen of the state of Oklahoma.
- **3.** Cottrell is a manufacturer of car-hauling trailers, with its only facility in Gainesville, Georgia.

The parties have not been able to reach agreement on a summary of the case that may be used in Voir Dire. The parties believe they may be able to reach agreement by Monday, March 24, 2014, or, in the alternative, they can submit separate proposals.

## Respectfully submitted,

# ARMBRUSTER, DRIPPS, WINTERSCHEIDT & BLOTEVOGEL, LLC

#### By \_\_\_\_s/ Michael T. Blotevogel

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and

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Attorneys for Plaintiffs

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed through this Court's ECF system on March 21, 2014, which should result in service on the following attorneys of record:

Dan Carpenter Amy Lorenz-Moser Armstrong, Teasdale LLP 7700 Forsyth Blvd., Suite 1800 St. Louis, MO 63105 Attorneys for Cottrell, Inc.

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/s/ Michael T. Blotevogel