

SHUMWAY • VAN

8985 South Eastern Avenue, Suite 100

Las Vegas, Nevada 89123

Telephone: (702) 478-7770 Facsimile: (702) 478-7779

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**SHUMWAY VAN**  
MICHAEL C. VAN, ESQ.  
Nevada Bar No. 3876  
DANIEL M. HANSEN, ESQ.  
Nevada Bar. No. 13886  
8985 South Eastern Avenue, Suite 100  
Las Vegas, Nevada 89123  
Telephone: (702) 478-7770  
Facsimile: (702) 478-7779  
Email: michael@shumwayvan.com  
daniel@shumwayvan.com  
*Attorneys for Plaintiff*  
**IMA ILIU FLORES ZELAYA**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

IMA ILIU FLORES ZELAYA, individually  
and as Special Co-Administrator of the Estate  
of Luis Solano, and as legal guardian of LUIS  
JERSAIN SOLANO, JR.; ELIA  
DELCARMEN SOLANO-PATRICIO,  
individually and as Special Co-Administrator  
of the Estate of Luis Solano,

Plaintiff,

vs.

LAS VEAS METROPOLITAN POLICE  
DEPARTMENT, a political subdivision of the  
State of Nevada; SHERIFF BILL GILLESPIE,  
individually and in his capacity as Sheriff of  
the Las Vegas Metropolitan Police  
Department; SGT. DAVID ASPIAZU,  
individually and in his capacity;  
CORRECTIONS OFFICER BRADLEY  
TEMPLE, individually and in his capacity;  
CORRECTIONS OFFICER PATRICK  
GRAY, individually and in his capacity;  
CORRECTIONS OFFICER EUGENE  
DIXON, individually and in his capacity;  
NAPHCARE, INC., an Alabama corporation;  
DOES OFFICERS I through X, individually,  
and in their official capacity; DOSE XI  
through XX and ROE CORPORATIONS XXI  
through XXX, inclusive,

Defendants.

Case No.: 2:13-cv-01181-JAD-CWH

**STIPULATION AND ORDER TO  
CONTINUE HEARING**

Hearing Date: January 17, 2017  
Hearing Time: 3:00 p.m.

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**STIPULATION AND ORDER TO CONTINUE HEARING**

Plaintiff, IMA ILIU FLORES ZELAYA (“Mrs. Flores-Zelaya”), through her attorneys of record, Adam Anderson, Esq., with Clear Counsel Law Group, and her former attorneys, Michael C. Van, Esq., of SHUMWAY VAN, hereby stipulate and agree to the following:

WHEREAS, Plaintiff Mrs. Flores-Zelaya, changed attorneys, which started their involvement on September 13, 2016;

WHEREAS, Plaintiff’s former counsel Shumway Van has agreed to continue representation for the limited purpose of obtaining an order from a Nevada State District Court allowing for the establishment of a blocked account to deposit the settlement proceeds due to Luis Jersain Solano, Jr.;

WHEREAS, Plaintiff’s former counsel appeared before Judge Jim Crockett in Department 24 of the Clark County Eighth District Court on January 10, 2017 (*case no. A-16-731184-M*), to establish the blocked account;

WHEREAS, Judge Crockett informed Plaintiff’s former counsel that he could not sign an order establishing the blocked account as requested by Plaintiff because the terms of the proposed order would contradict an order issued by Judge Timothy C. Williams of Department 16 of the Clark County Eighth District Court on February 18, 2016 (*case no. A-16-731892-M*), related to other minors who had received settlement awards in this matter;

WHEREAS, Plaintiff’s former counsel is currently working with the attorney who appeared before Judge Williams, to file an amended order with Judge Williams so that Plaintiff’s former counsel may then obtain the proposed order from Judge Crockett;

WHEREAS, Plaintiff’s former counsel is still in the process of obtaining the necessary order from Judge Crockett allowing them to establish a blocked account for the settlement award received by Luis Jersain Solano, Jr.;

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...

1 The Parties stipulate and agree to continue the hearing scheduled for January 17, 2017, at  
2 3:00 p.m. in the above-entitled cause for a period of not less than sixty (60) days as of the date of  
3 the Order granting this Stipulation.

4 DATED THIS \_\_\_\_ day of January, 2017. DATED THIS \_\_\_\_ day of January, 2017.

6 /s/Adam C. Anderson  
7 Adam C. Anderson, Esq.  
8 CLEARCOUNSEL LAW GROUP  
9 50 S. Stephanie St., Ste. 101  
10 Henderson, Nevada 89012  
11 *Attorney for Plaintiff*  
12 *IMA ILIU FLORES ZELAYA*

/s/Daniel M. Hansen  
Michael C. Van, Esq., Bar # 3876  
Daniel M. Hansen, Esq., Bar # 13886  
SHUMWAY VAN  
8985 S. Eastern Avenue, Suite 100  
Las Vegas, Nevada 89123  
*Former Attorneys for Plaintiff*  
*IMA ILIU FLORES ZELAYA*

**ORDER**

Based on the foregoing Stipulation and for good cause the Court makes the following  
Orders:

**IT IS HEREBY ORDERED** that the hearing previously set for January 17, 2017, be  
continued to March 20, 2017 at the hour of 1:30 p.m.

DATED: January 17, 2017.



UNITED STATES DISTRICT COURT JUDGE

Respectfully Submitted by:

SHUMWAY • VAN

\*IT IS FURTHER ORDERED that all parties,  
including Plaintiff, Ms. Flores, and attorney  
Michael Van, MUST BE PRESENT.

/s/Daniel M. Hansen  
Michael C. Van, Esq., Bar # 3876  
Daniel M. Hansen, Esq., Bar # 13886  
8985 S. Eastern Avenue, Suite 100  
Las Vegas, Nevada 89123  
*Attorneys for Plaintiff*  
*IMA ILIU FLORES ZELAYA*