

LAGOMARSINO LAW
3005 W. Horizon Ridge Parkway, Suite 241 • Henderson, Nevada 89052
Telephone (702) 383-2864 Facsimile (702) 383-0065

1 **LAGOMARSINO LAW**
2 ANDRE M. LAGOMARSINO, ESQ.
3 Nevada Bar No. 6711
4 3005 West Horizon Ridge Parkway, Suite 241
5 Henderson, Nevada 89052
6 Telephone: (702) 383-2864
7 Facsimile: (702) 383-0065
8 *Attorney for Plaintiffs*

6 **UNITED STATES DISTRICT COURT**
7
8 **DISTRICT OF NEVADA**

8 VALERIE HIRATA; WHITNIE TAYLOR; and
9 ANGELA JONES

CASE NO.: 2:13-cv-02302-LDG-VCF

10 Plaintiffs,

11 v.

STIPULATION AND
ORDER TO DISMISS PLAINTIFFS'
PUNITIVE DAMAGE CLAIMS WITH
PREJUDICE AGAINST ALL
INDIVIDUAL DEFENDANTS

12 SOUTHERN NEVADA HEALTH DISTRICT, a
13 political subdivision of Clark County, Nevada;
14 GLENN SAVAGE, in both his individual and
15 official capacity; AMY IRANI, in both her
16 individual and official capacity; SUSAN
17 LABAY, in both her individual and official
18 capacity; JACQUELYN RAICHE-CURL, in
19 both her individual and official capacity; ANGUS
20 MACEACHERN, in both his individual and
21 official capacity; ROBERT GUNNOE, in both
22 his individual and official capacity; KIM
23 DIPASQUALE, in both her individual and
24 official capacity; LAWRENCE SANDS, in both
25 his individual and official capacity;

21 Defendants.

22 Plaintiffs VALERIE HIRATA, WHITNIE TAYLOR and ANGELA JONES, by and
23 through their attorney of record, Andre M. Lagomarsino, Esq., of the law firm of Lagomarsino
24 Law, and Defendants SOUTHERN NEVADA HEALTH DISTRICT, ANGUS MACEACHERN,
25 ROBERT GUNNOE, KIM DIPASQUALE, and LAWRENCE SANDS, by and through their
26 attorney of record, Whitney Selert, Esq., of the law firm of Fisher & Phillips LLP, and Defendants
27 GLENN SAVAGE, AMY IRANI, SUSAN LABAY, JACQUELYN RAICHE-CURL, by and
28

1 through their counsel of record, Walter Cannon, Esq. and Peter Angulo, Esq., of the law firm of
2 Olson, Cannon, Gormley, Angulo & Stoberski, for good cause hereby stipulate as follows:

3 1. All punitive damage claims asserted by Plaintiffs against all individual Defendants
4 are DISMISSED WITH PREJUDICE, as to those particular individual Defendants pursuant to
5 Local Rules 6-2 and 7-1 of the United States District Court for the District of Nevada.
6

7 DATED this 1st day of April, 2016.

DATED this 1st day of April, 2016.

8 LAGOMARSINO LAW

OLSON, CANNON, GORMLEY, ANGULO &
STOBERSKI

9 /s/ Andre M. Lagomarsino, Esq.
10 ANDRE M. LAGOMARSINO, ESQ. (#6711)
11 3005 West Horizon Ridge Parkway, Suite 241
12 Henderson, Nevada 89052
13 *Attorney for Plaintiffs*

/s/ Peter Angulo, Esq.
WALTER CANNON, ESQ. (#1505)
PETER ANGULO, ESQ. (#3672)
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
*Attorneys for Defendants Savage, Irani, Labay,
Raiche-Curl and Evangelista*


14 DATED this 1st day of April, 2016.

15 FISHER & PHILLIPS LLP

16 /s/ Whitney Selert, Esq.
17 MARK RICCIARDI, ESQ.
18 Attn: WHITNEY SELERT, ESQ.
19 300 South Fourth Street, Suite 1500
20 Las Vegas, Nevada 89101
*Attorneys for Southern Nevada Health District,
Maceachern, Sands, Gunnoe and Dipasquale*

ORDER

21
22
23 IT IS SO ORDERED:


24
25 UNITED STATES DISTRICT JUDGE
LLOYD D. GEORGE
26 Dated: 6 April 2016
27
28