

1 THOMAS P. BEKO, ESQ. (#002653)
 ERICKSON, THORPE & SWAINSTON, LTD.
 2 99 West Arroyo Street
 P.O. Box 3559
 3 Reno, Nevada 89505
 Telephone: (775) 786-3930
 4 *Attorneys for Defendant*

5
 6 **UNITED STATES DISTRICT COURT**
 7 **DISTRICT OF NEVADA**
 8

9 ANGELICA MARIA KEATING,
 individually; KIMBERLY ELAINE
 10 KEATING, individually; ALICIA
 DOMINGUEZ KEATING, individually,
 11

Case No.: 2:14-cv-01632-JAD-GWF

12 Plaintiffs,

13 vs.

14 ROBERT GLENNEN, III, individually,

15 Defendant .
 _____ /

16 **STIPULATION FOR ENTRY OF ORDER TO PRODUCE RECORDS**

17 COME NOW, Plaintiffs, ANGELICA MARIA KEATING, KIMBERLY ELAINE
 18 KEATING, and ALICIA DOMINGUEZ KEATING, by and through their attorneys,
 19 Parker/Scheer Lagomarsino, and Andre M. Lagomarsino, Esq., and Defendant, ROBERT
 20 GLENNEN, III, by and through his attorneys, Erickson, Thorpe & Swainston, Ltd., and
 21 Thomas P. Beko, Esq., and hereby stipulate to the entry of the attached proposed order
 22 directing the State of Nevada, Department of Health and Human Services, Division of Public
 23 and Behavioral Health to produce a certified copy of the Affidavit/Declaration of Paternity
 24 signed by the plaintiff, Angelica Maria Keating, regarding Alicia Denise Bennet, a minor
 25 child.

26 The parties stipulate that this action arises as a result of actions taken by the defendant
 27 Glennen to prosecute the plaintiff for alleged violations of Nevada law, some of which
 28 pertained to her removal of a minor child from this state. While the Nevada Department of

Erickson, Thorpe & Swainston, Ltd.
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1 Health and Human Services has indicated that it has in its file a copy of the pertinent
2 Affidavit/Declaration of Paternity, they have declined requests to produce a copy of that
3 document absent a court order. *See, attached Exhibit 1.* The parties have agreed to the entry
4 of the attached proposed order compelling the production of the document. Pursuant to
5 Nevada Revised Statutes, § 440.170(2), such records may only be disclosed upon order of a
6 court of competent jurisdiction.

7 As the parties agree that good cause exists for the production of this record, the parties
8 request this Court to enter the proposed order attached hereto as Exhibit 2.

9
10 Dated this 20th day of May, 2015. Dated this 20th day of May, 2015.

11 PARKER/SCHER LAGOMARSINO ERICKSON, THORPE & SWAINSTON, LTD.
12

13 By: /s/ Andre M. Lagomarsino, Esq. By: /s/ Thomas P. Beko, Esq.
14 Andre M. Lagomarsino, Esq. Thomas P. Beko, Esq.
15 *Attorneys for Plaintiffs Attorneys for Defendant*
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1 CERTIFICATE OF SERVICE

2 Pursuant to FRCP 5(b), I certify that I am an employee of ERICKSON, THORPE &
3 SWAINSTON, LTD., and that on this day I personally served a true and correct copy of the
4 foregoing *Stipulation for Entry of Order to Produce Records* on all parties in this action by
5 Electronic Mail through the United States District Court's CM/ECF Filing System.

6 Dated this 20th day of May, 2015.

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8 _____
9 Dana Matthews

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EXHIBIT 1

EXHIBIT 1

BRIAN SANDOVAL
Governor

STATE OF NEVADA

MARTA E. JENSEN
Acting Administrator

RICHARD WHITLEY, MS
Interim Director



TRACEY D. GREEN, MD
Chief Medical Officer

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
DIVISION OF PUBLIC AND BEHAVIORAL HEALTH**
4150 Technology Way, Suite 104
Carson City, Nevada 89706
(775) 684-4242 Fax (775) 684-4156

Date: April 14, 2015

To: Thomas Beko
PO Box 3559
Reno, NV 89505

Name of Child: **Alicia Denise BENNETT**
Date of Birth: **June 10, 2011**
Place of Birth: **Las Vegas, Nevada**

Please be advised that we have on file in this office an Affidavit/Declaration of Paternity signed by, **Jody Foy Bennett**, who states himself to be the father of the above named child and signed by the mother **Angelica Maria Keating**. This statement was filed in our office on **June 30, 2011**.

This is to certify the above stated facts are true and correct.

By: _____

Pam Gillilan
Administrative Asst. II

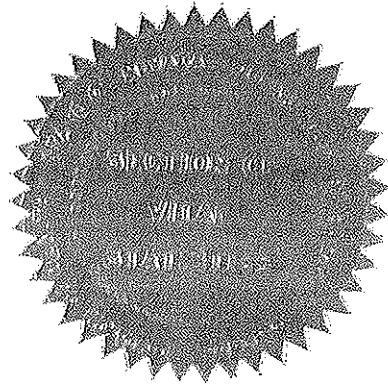


EXHIBIT 2

EXHIBIT 2

Erickson, Thorpe & Swainston, Ltd.
P.O. Box 3559
Reno, Nevada 89505
Tel. (775) 786-3930 Fax (775) 786-4160

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Case No.: 2:14-cv-01632-JAD-GWF

ANGELICA MARIA KEATING,
individually; KIMBERLY ELAINE
KEATING, individually; ALICIA
DOMINGUEZ KEATING, individually,

Plaintiffs,

vs.

ROBERT GLENNEN, III, individually,

Defendant .

ORDER TO PRODUCE AFFIDAVIT/DECLARATION OF PATERNITY

Based upon the stipulation of parties hereto, and good cause appearing,

IT IS HEREBY ORDERED that the Department of Health and Human Services,
Division of Public and Behavioral Health, State of Nevada, shall produce a certified copy of
the Affidavit/Declaration of Paternity signed by plaintiff, Angelica Maria Keating, regarding
Alicia Denise Bennett, a minor child, to Thomas Beko, Esq., 99 West Arroyo Street, Reno,
Nevada 89509.

Dated this 21st day of May, 2015.


United States Magistrate Judge