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8 *Attorneys for the State Defendants*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 DANIEL VARGAS, individually,
 12 Plaintiffs,
 vs.

CASE NO. 2:14-cv-1942-JCM-CWH

13 AMBER HOWELL, Administrator of the
 14 Nevada Division of Child and Family
 Services in her individual capacity; STEVE
 15 MCBRIDE, Deputy Administrator of
 Nevada Youth Training Center in his
 16 individual capacity; RICHARD
 GLOECKNER, Superintendent, Nevada
 17 Youth Training Center in his individual
 capacity; ROBERT K. STOKES, Elko
 18 County Manager in his individual capacity;
 ELKO COUNTY; JAMES GOODSON,
 19 Head Group Supervisor, in his individual
 capacity; RUSSELL TAYLOR, Assistant
 20 Head Group Supervisor, in his individual
 capacity; GARY PATTERSON, Group
 21 Supervisor, in his individual capacity;
 SHAUN BRILEY, Group Supervisor, in his
 22 individual capacity; JOHN OLSON, Group
 Supervisor, in his individual capacity;
 23 DEBORAH KNOTTS, Correctional Nurse,
 in her individual capacity; DOE OFFICERS
 24 I-X, DOE HEALTH CARE PROVIDERS IX,
 DOES I-X, inclusive, DOES XI-XX,
 25 Inclusive, ROEs I-X,

26 Defendants.

**STIPULATION AND ORDER TO
 STAY THE RENEWED MOTION FOR
 ATTORNEYS' FEES AND BRIEFING
 PENDING SETTLEMENT
 APPROVAL**

27 IT IS HEREBY STIPULATED AND AGREED, by and between Defendants Amber
 28 Howell, Steve McBride, Richard Gloeckner, James Goodson, Russell Taylor, Shaun Briley,

1 John Olson and Deborah Knotts (collectively, the “State Defendants”), and Plaintiff Daniel
2 Vargas, by and through their respective counsel:

3 That the parties have a conditional settlement pending approval of the Board of
4 Examiners, which will be set on August 11, 2020. Because Nevada law requires approval
5 by the Board of Examiners of this conditional settlement, the parties stipulate and agree
6 that all briefing on the Renewed Motion for Attorneys’ Fees will be stayed pending
7 approval. Additionally, the parties anticipate they will file a Stipulated Dismissal and
8 Withdrawal of the Renewed Motion for Attorney’s Fees, no later than August 25, 2020,
9 which is two weeks post Board of Examiners meeting.

10 Respectfully submitted this 15th day of June, 2020.

11 AARON D. FORD
12 Attorney General

CHRISTIANSSEN LAW OFFICES

13 By: /s/ Steve Shevorski
14 Steve Shevorski (Bar No. 8256)
15 Chief Litigation Counsel
Attorneys for State Defendants

By: /s/ Kendelee L. Works
Peter S. Christiansen (Bar No. 5254)
Kendelee L. Works (Bar No. 9611)
Keely A. Perdue (Bar No. 13931)
Attorneys for Plaintiff

17 **ORDER**

18 **IT IS SO ORDERED.**

19 DATED June 19, 2020.

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23 _____
24 UNITED STATES DISTRICT JUDGE
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