

1 ADAM PAUL LAXALT  
2 Attorney General  
3 JENNIFER K. HOSTETLER (Bar. No. 11994)  
4 Chief Deputy Attorney General  
5 Office of the Attorney General  
6 555 E. Washington Ave. #3900  
7 Las Vegas, Nevada 89101  
8 (702) 486-3267 (phone)  
9 (702) 486-3773 (fax)  
10 jhostetler@ag.nv.gov

11 Attorneys for Defendant  
12 Senior Investigator Carrie Meads

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

EDDIE WORMWOOD,

Case No. 2:15-cv-01438-JAD-GWF

Plaintiff,

vs.

NORTH LAS VEGAS POLICE  
DEPARTMENT, a political subdivision of the  
STATE OF NEVADA; CITY OF NORTH LAS  
VEGAS; FORMER CHIEF OF NORTH LAS  
VEGAS POLICE DEPARTMENT JOSEPH  
CHRONISTER (in his individual capacity and  
official capacity as Chief of North Las Vegas  
Police Department); DETECTIVE DAVE  
MOLNAR (individually and in his capacity as a  
police officer employed by the City of North Las  
Vegas Police Department); DEPUTY DISTRICT  
ATTORNEY JAMES R. SWEETEN (in his  
individual capacity); SENIOR INVESTIGATOR  
CARRIE MEADS (in her individual capacity);  
DISTRICT ATTORNEY STEVEN B.  
WOLFSON (in his individual and official  
capacity), CHIEF DEPUTY DISTRICT  
ATTORNEY PETER THUNELL (in his  
individual and official capacity), DEPUTY  
DISTRICT ATTORNEY MICHELLE FLECK  
(in her individual and official capacity, CLARK  
COUNTY, NEVADA; THE CLARK COUNTY  
DISTRICT ATTORNEY'S OFFICE, DOE  
OFFICERS, CLARK COUNTY, NEVADA, 1  
through 10 (in their individual and official  
capacities), inclusive and, JOHN DOES 1-10,  
inclusive.

Defendants.

**JOINT STIPULATION TO STAY DISCOVERY PENDING DISPOSITION OF  
DEFENDANTS' MOTIONS TO DISMISS**

**(SECOND REQUEST)**

Pursuant to LR IA 6-1 and LR 7-1, Defendants North Las Vegas Police Department, City of North Las Vegas, Joseph Chronister, Dave Molnar (collectively, the “North Las Vegas Defendants”), Steven B. Wolfson, Peter Thunell, Clark County, Nevada, the Clark County District Attorney’s Office (collectively, the “Clark County Defendants”), James R. Sweetin, and Carrie Meads, along with Plaintiff Eddie Wormwood, by and through undersigned counsel of record, hereby stipulate and agree as follows:

On July 28, 2015, Plaintiff filed his Complaint under 42 U.S.C. § 1983. (ECF No. 3). The North Las Vegas Police Department, the City of North Las Vegas, and Joseph Chronister filed a Motion to Dismiss (ECF No. 13) on September 8, 2015. On September 30, 2015, James R. Sweetin filed a Joinder to the Motion to Dismiss (ECF No. 18). On November 2, 2015, Dave Molnar filed a Joinder to the Motion to Dismiss (ECF No. 31). On December 21, 2015, Carrie Meads filed a Joinder to the Motion to Dismiss (ECF No. 37).

On October 26, 2015, Plaintiff and the defendants who had appeared at the time filed a Joint Stipulation to stay all discovery until disposition of the pending Motion to Dismiss and joinder. (ECF No. 30). The Court entered an order staying discovery on November 3, 2015. (ECF No. 33).

On July 26, 2016, the Court issued its Order granting the Motion to Dismiss and joinders to the same, finding that Plaintiff's claims were barred by the applicable two year statute of limitations. (ECF No. 41). Plaintiff, however, was given leave to amend his Complaint. (*Id.*)

On August 9, 2016, Plaintiff filed his First Amended Complaint (FAC) alleging four causes of action: (1) violations of 42 U.S.C. § 1983 and Nevada state law for malicious prosecution; (2) intentional infliction of emotional distress; (3) abuse of process; and (4) conspiracy and naming the Clark County Defendants as new parties. (ECF No. 42). The North Las Vegas Defendants filed their Motion to Dismiss the FAC on August 22, 2016. (ECF No. 50). James R. Sweetin filed his Motion to Dismiss the FAC on August 23, 2016. (ECF No. 51). Meads filed her Motion to Dismiss the FAC on August 26, 2016. (ECF No. 52). The Clark County Defendants filed their Motion to Dismiss the FAC on October 7, 2016. (ECF No. 60). The Clark County Defendants' Motion to Dismiss is currently

1 being briefed. All other motions to dismiss are fully briefed. Defendant Michelle Fleck has not yet  
2 appeared.

3 Given the nature of the case and the arguments raised in the various motions to dismiss the FAC  
4 (e.g. that Plaintiff's claims remain barred by the applicable statute of limitations, that Plaintiff has  
5 failed to state a claim for relief, and that each defendant is shielded from Plaintiff's claims by  
6 immunity) and the fact that one defendant has not yet appeared, the parties agree to stay all discovery,  
7 including the Fed. R. Civ. P. 26(f) conference until the Court rules on the pending motions to dismiss.

8 This Stipulation is submitted in good faith and not for the purpose of causing delay. The claims  
9 or issues subject to discovery in this case are dependent upon the Court's ruling on the various motions  
10 to dismiss. All or part of the claims alleged against Defendants in the FAC may be dismissed once the  
11 Court rules on the pending motions, and the parties agree that a stay will prevent the parties from  
12 engaging in costly and time-consuming discovery on claims that may ultimately be dismissed.

13 This is the second stipulation seeking a stay of discovery in this matter and the first stipulation  
14 joined by Dave Molnar, Carrie Meads, and the Clark County Defendants.

15 IT IS SO STIPULATED, this 24th day of October, 2016.

16  
17 ADAM PAUL LAXALT  
Attorney General

JUSTICE FORCE LAW GROUP LLC

18  
19 By: /s/ Jennifer K. Hostetler  
JENNIFER K. HOSTETLER (Bar No. 11994)  
Chief Deputy Attorney General  
555 E. Washington Ave., Ste. 3900  
Las Vegas NV 89101-1068  
Attorneys for Defendant  
Senior Investigator Carrie Meads

By: /s/ Zarinah Muhammad  
ZARINAH MUHAMMAD  
Nevada Bar No. 12830  
6278 Ruby Kinglet  
Las Vegas, NV 89148  
Attorneys for Plaintiff Eddie Wormwood

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2 LEWIS BRISOIS BISGAARD & SMITH LLP  
3

4 By: /s/ Robert W. Freeman, Jr.  
5

6 ROBERT W. FREEMAN, JR.  
7 Nevada Bar No. 3062  
8 6385 S. Rainbow Boulevard, Ste. 600  
9 Las Vegas, NV 89118  
10 *Attorneys for Defendants North Las Vegas  
11 Police Department, City of North Las Vegas,  
12 Chief Joseph Chronister and Detective Dave  
13 Molnar*

14 STEVEN B. WOLFSON  
15 District Attorney  
16

17 By: /s/ Robert J. Gower  
18

19 ROBERT J. GOWER  
20 Deputy District Attorney  
21 Nevada Bar No. 1868  
22 500 S. Grand Central Pkwy.  
23 P.O. Box 552215  
24 Las Vegas NV 89155-2215  
25 *Attorneys for Defendants Clark County,  
26 Nevada, Clark County District Attorney's  
27 Office, Clark County District Attorney Steven  
28 B. Wolfson, Clark County Chief Deputy  
District Attorney Peter Thunell, and Deputy  
District Attorney James Sweetin*

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