

1 CLARK HILL PLLC  
 2 PAOLA M. ARMENI  
 Nevada Bar No. 8357  
 Email: [parmeni@clarkhill.com](mailto:parmeni@clarkhill.com)  
 3 3800 Howard Hughes Pkwy., #500  
 Las Vegas, Nevada 89169  
 4 Tel: (702) 862-8300  
 Fax: (702) 862-8400  
 5 Attorneys for Plaintiffs, Perez Family

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

8 VICTOR PEREZ, as Special Administrator of  
 the Estate of CARLOS PEREZ, deceased;  
 9 VICTOR PEREZ, as the Guardia Ad Litem for  
 S.E.P., a minor; VICTOR PEREZ, as the Guardia  
 10 Ad Litem for A.I.P., a minor,

CASE NO.: 2:15-cv-01572-APG-DJA

11 Plaintiffs,

**STIPULATION AND ORDER  
 TO LIFT STAY**

12 vs.

13 STATE OF NEVADA, ex.rel. NEVADA  
 DEPARTMENT OF CORRECTIONS;  
 14 DIRECTOR GREG COX, individually;  
 WARDEN DWIGHT NEVEN, individually;  
 15 ASSISTANT WARDEN TIMOTHY FILSON,  
 individually; COT. RAMOS, individually;  
 16 LIEUTENANT OLIVER, individually;  
 CORRECTIONS OFFICER CASTRO,  
 17 individually; CORRECTIONS OFFICER  
 SMITH, individually; and DOES I-X, inclusive;  
 and ROES I-X, inclusive,

18 Defendants.  
 19

20 The parties in the above-referenced matter, by and through their attorneys, hereby jointly  
 21 move the Court for an Order lifting the stay in this matter.

22 A Motion to Stay was filed by Defendant Ramos on April 25, 2016. [ECF 59]. On May 9,  
 23 2016, Defendants James Greg Cox, Timothy Filson, Dwight W. Neven, and Ronald Oliver filed  
 24 a Joinder to Defendant Ramos' Motion to Stay. [ECF 62]. On June 17, 2016, the Court granted  
 25 Defendant Ramos' Motion to Stay in that discovery was stayed in its entirety as to Defendant  
 26 Ramos pending the resolution of his criminal case. As to the other parties, the Court granted the  
 27 motion to stay and discovery was stayed with the exception that the depositions of percipient  
 28 inmate witnesses shall be scheduled. The criminal matter has been resolved, thus there is no need

1 to stay the action before this Court.

2 The circumstances that prompted this Court to stay this action on June 17, 2016, have  
3 since resolved. Thus, the stay is no longer necessary or appropriate. Accordingly, the parties  
4 respectfully request an order from the Court lifting the stay.

5 DATED this 4<sup>th</sup> day of December, 2019.

DATED this 4<sup>th</sup> day of December, 2019.

6 CLARK HILL, PLLC  
7 /s/ Paola A. Armeni  
8 PAOLA M. ARMENI  
9 Nevada Bar No. 8357  
3800 Howard Hughes Pkwy., #500  
Las Vegas, Nevada 89169  
Tel: (702) 862-8300  
Attorney for Plaintiffs

LEWIS BRISBOIS BISGAARD & SMITH LLP  
/s/ Robert w. Freeman, Jr.  
ROBERT W. FREEMAN, JR.  
Nevada Bar No. 3062  
6385 s. Rainbow Blvd., Ste. 600  
Las Vegas, Nevada 89118  
Tel: (702) 893-3383  
Attorneys for Defendant Ramos

10 DATED this 4<sup>th</sup> day of December, 2019.

DATED this 4<sup>th</sup> day of December, 2019.

11 AARON FORD, Attorney General  
12 /s/ Steve Shevorsi  
13 STEVE SHEVORSKI  
14 Nevada Bar No. 8256  
15 THERESA M. HAAR  
16 Nevada Bar No 12158  
17 555 East Washington Ave. Ste. 3900  
18 Las Vegas, Nevada 89101  
19 Tel: (702) 486-3792  
Attorneys for Defendants James Greg  
Cox, Timothy Filson, Dwight W. Neven  
and Ronald Oliver

ASHCRAFT & BARR, LLP  
/s/ Jeffrey F. Barr  
JEFFREY F. BARR  
Nevada Bar No. 7269  
2300 West Sahara, Suite 900  
Las Vegas, Nevada 89102  
Tel: (702) 631-7555

20 DATED this 4<sup>th</sup> day of December, 2019.

LEE I. IGLODY  
Nevada Bar No. 7757  
7450 Arroyo Crossing Pkwy, Suite 270  
Las Vegas, Nevada 89113  
Tel: (702) 425-5366  
Attorneys for Isaiah Smith

21 MARQUIS & AURBACH  
22 /s/ Craig R. Anderson  
23 CRAIG R. ANDERSON  
24 Nevada Bar No. 6882  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Tel: (702) 382-0711  
Attorney for Castro

**IT IS SO ORDERED**

Dated this 6<sup>th</sup> day of December, 2019.

  
\_\_\_\_\_  
DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE