Perez et al v. Cox e		Doc.	
	Case 2:15-cv-01572-APG-DJA Document 25	4 Filed 02/21/23 Page 1 of 2	
1	CLARK HILL PLLC		
2	PAOLA M. ARMENI		
2	Nevada Bar No. 8357 Email: parmeni@clarkhill.com		
3	GIA N. MARINA		
4	Nevada Bar No. 15276		
5	Email: gmarina@clarkhill.com 1700 S. Pavilion Center Dr., Ste. 500		
3	Las Vegas, Nevada 89135		
6	Tel: (702) 862-8300 Fax: (702) 778-9709		
7	Attorneys for Plaintiffs, Perez Family		
8		ICTRICT COURT	
	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
9	VICTOR PEREZ, as Special Administrator of	CASE NO.: 2:15-cv-01572-APG-DJA	
10	the Estate of CARLOS PEREZ, deceased;	CASE NO.: 2.13-cv-01372-At G-D3A	
11	VICTOR PEREZ, as the Guardia Ad Litem for S.E.P., a minor; VICTOR PEREZ, as the Guardia		
12	Ad Litem for A.I.P., a minor,		
	Plaintiffs,	STIPULATION AND ORDER TO CONTINUE SETTLEMENT	
13	vs.	CONFERENCE	
14	STATE OF NEVADA, ex.rel. NEVADA	(FIRST REQUEST)	
15	DEPARTMENT OF CORRECTIONS; DIRECTOR GREG COX, individually;		
	WARDEN DWIGHT NEVEN, individually;		
16	ASSISTANT WARDEN TIMOTHY FILSON, individually; COT. RAMOS, individually;		
17	LIEUTENANT OLIVER, individually;		
18	CORRECTIONS OFFICER CASTRO, individually; CORRECTIONS OFFICER		
	SMITH, individually; and DOES I-X, inclusive;		
19	and ROES I-X, inclusive,		
20	Defendants.	Winter Develope Constitution of	
21	IT IS HEREBY STIPULATED by and between Victor Perez, as Special Administrator of		
22	the Estate of Carlos Perez, deceased, by and through his counsel, Paola M. Armeni, Esq., and Gia		
23	N. Marina, Esq., of the law firm of Clark Hill, Defendant Raynaldo Ramos, by and through his		
24	counsel, Robert W. Freeman, Jr. Esq., of the law firm of Lewis Brisbois Bisgaard & Smith, LLP,		
25	Defendants, State of Nevada ex rel Nevada Department of Corrections, James Greg Cox, Timothy		
26	Filson, Dwight W. Neven and Ronald Oliver, by and through their counsel, Kiel Ireland, Esq. and		
27	Craig Newby, Esq., of the Attorney General's Office, Defendant Isaiah Smith, by and through his		
28	counsel of record Jeffrey F. Barr, Esq. and Alina Shell, Esq. of the law firm of Armstrong Teasdale,		
20	and Defendant Jeff		
	1 of 2		
	CLARKHILL\J2020\392971\270468085.v1-2/17/23	Dockets.Justia.	
	1	Duckets.Justia.t	

Doc. 254

Dockets.Justia.com

1			
2	Castro, by and through his counsel, Craig	Anderson, Esq., of the law firm of Marquis Aurbach	
3	and hereby respectfully submit this Stipulation to continue the Settlement Conference currently		
4	set for March 14, 2023 at 10:00 a.m. to be continued to April 24, 2023 at 10:00 a.m.		
5	Finally, the parties stipulate to move the Confidential Written Evaluation Statemen		
6	deadline currently scheduled for March 7, 2023 by 4:00 p.m., to April 17, 2023 by 4:00 p.m.		
7	APPROVED AS TO FORM AND CONTENT.		
8	Respectfully submitted this 17 th day of Feb.	ruary 2023.	
9	CLARK HILL, PLLC		
10	/s/ Paola M. Armeni, Esq. PAOLA M. ARMENI	LEWIS BRISBOIS BISGAARD & SMITH	
11	Nevada Bar No. 8357 GIA N. MARINA	LLP /s/ Robert W. Freeman, Jr., Esq.	
12	Nevada Bar No. 15276	Robert W Freeman, Jr., Esq.	
	1700 S. Pavilion Center Dr. Ste., #500 Las Vegas, Nevada 89135	Nevada Bar No. 3062	
13	Attorneys for Plaintiffs, Perez Family	6385 S. Rainbow Blvd., Ste. 600 Las Vegas, NV 89118	
14	MARQUIS AURBACH COFFING	Attorneys for Defendant Raynaldo Ramos	
15	/s/ Craig R. Anderson, Esq.		
16	Craig R. Anderson, Esq. Nevada Bar No. 6882	OFFICE OF THE ATTORNEY GENERAL /s/ Craig Newby, Esq.	
16	10001 Park Run Drive	Craig Newby, Esq.	
17	Las Vegas, NV 89145	Nevada Bar No. 8591	
10	Attorneys for Defendant Jeffrey Castro	Kiel Ireland, Esq.	
18		Nevada Bar No. 15368	
19	ARMSTRONG TEASDALE	100 N Carson St Carson City, NV 89701	
20	/s/ Jeffrey F. Barr, Esq. Jeffrey F. Barr, Esq.	Attorneys for Defendants, State of Nevada,	
20	Nevada Bar No. 7269	Dwight W. Neven, James Greg Cox	
21	Alina Shell, Esq.	Ronald Oliver, Timothy Filson	
22	Nevada Bar No. 11711 3770 Howard Hughes Parkway, Suite 200		
23	Las Vegas, NV 89169		
	Attorneys for Defendant Isaiah Smith	<u>ORDER</u>	
24		ORDER	
25	IT IS SO ORDERED:		
26	DATED:February 21, 2023		
27			
28		UNITED STATES MAGISTRATE JUDGE	