Perez et al v. Cox et al Doc. 276

CLARK HILL PLLC 1 PAOLA M. ARMENI 2 Nevada Bar No. 8357 Email: parmeni@clarkhill.com 3 GIA N. MARINA Nevada Bar No. 15276 4 Email: gmarina@clarkhill.com 1700 S. Pavilion Center Dr., Ste. 500 5 Las Vegas, Nevada 89135 Tel: (702) 862-8300 6 Fax: (702) 778-9709 7 Attorneys for Plaintiffs, Perez Family 8 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; VICTOR PEREZ, as the Guardia Ad Litem for 11 S.E.P., a minor; VICTOR PEREZ, as the Guardian Ad Litem for A.I.P., a minor, 12 STIPULATION AND ORDER FOR Plaintiffs, DISMISSAL WITH PREJUDICE 13 14 STATE OF NEVADA, ex.rel. NEVADA **DEPARTMENT OF CORRECTIONS:** 15 DIRECTOR GREG COX, individually; WARDEN DWIGHT NEVEN, individually; 16 ASSISTANT WARDEN TIMOTHY FILSON, individually; COT. RAMOS, individually; 17 LIEUTENANT OLIVER, individually; CORRECTIONS OFFICER CASTRO. 18 individually; CORRECTIONS OFFICER SMITH, individually; and DOES I-X, inclusive; 19 and ROES I-X, inclusive, 20 Defendants. COMES NOW, Plaintiffs Victor Perez, as Special Administrator of the Estate of Carlos 21 Perez, deceased, Victor Perez as Guardian Ad Litem for S.E.P. and A.I.P., by and through his 22 counsel, Paola M. Armeni, Esq., and Gia N. Marina, Esq., of the law firm of Clark Hill, Defendant 23 Raynaldo Ramos, by and through his counsel, Robert W. Freeman, Jr. Esq., of the law firm of 24 Lewis Brisbois Bisgaard & Smith, LLP, Defendants, State of Nevada ex rel Nevada Department 25 of Corrections, James Greg Cox, Timothy Filson, Dwight W. Neven and Ronald Oliver, by and 26 through their counsel, Kiel Ireland, Esq. of the Attorney General's Office, Defendant Isaiah Smith,

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by and through his counsel of record Jeffrey F. Barr, Esq. of the law firm of Ashcraft and Barr

LLP, and Defendant Jeff Castro, by and through his counsel, Craig Anderson, Esq., of the law firm

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1	of Marquis Aurbach, hereby agree and stipulate to the dismissal of Plaintiffs' claims against	
2	Defendants with prejudice. The parties have met the conditions of settlement and each party will	
3	bear their own attorney's fees and cost.	
4	APPROVED AS TO FORM AND CONTENT.	
5	Respectfully submitted this 27 th day of November 2023.	
6	CLARK HILL, PLLC	LEWIS BRISBOIS BISGAARD & SMITH LLP
7	/s/ Paola M. Armeni, Esq. PAOLA M. ARMENI	/s/ Robert W. Freeman, Jr., Esq.
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15		Attorneys for Defendants, State of Nevada,
16	ASHCRAFT AND BARR	Dwight W. Neven, James Greg Cox
10	/s/ Jeffrey F. Barr, Esq.	Ronald Oliver, Timothy Filson
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	Attorneys for Defendant Isaiah Smith	
20		
21		
22	<u>ORDER</u>	
23	IT IS SO ORDERED:	
24	DATED: November 28, 2023	
	DATED. November 26, 2025	
25		(1)
26		ANDREW P. GORDON
27		JNITED STATES DISTRICT JUDGE

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