

1 **Marquis Aurbach Coffing**
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 2 Nevada Bar No. 8996
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 3 Las Vegas, Nevada 89145
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 5 Attorneys for Joseph Lombardo

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

7 DOES 1-16; and UNKNOWN NAMED DOES
 8 1-1000,

Case No.: 2:15-cv-01638-RFB-CWH

9 Plaintiffs,

10 vs.

11 ADAM PAUL LAXALT, Attorney General of
 the State of Nevada; CHRIS PERRY, Director of
 the Nevada Department of Public Safety;
 12 NATALIE WOOD, Chief Parole and Probation
 Division of the Nevada Department of Public
 Safety; PATRICK J. CONMAY, Chief Records
 and Technology Division of the Nevada
 Department of Public Safety; JOSEPH
 13 LOMBARDO, Sheriff of the Las Vegas
 Metropolitan Police Department, ALEXANDER
 PEREZ, Chief of the North Las Vegas Police
 Department; STEVEN WOLFSON, District
 Attorney of Clark County; CHIEF PATRICK
 14 MOERS, Henderson Police Department,

15 Defendants.

16 **STIPULATION AND ORDER TO DISMISS CERTAIN DEFENDANTS WITHOUT**
 17 **PREJUDICE**

18
 19 Plaintiffs DOES -16 and Unnamed Does 1-1000 (collectively "Plaintiffs"), by and
 20 through their attorneys of record, Robert Draskovich, Esq., Gary A. Modafferi, Esq. and Allen
 21 Lichtenstein, Esq. and Defendants, Patrick E. Moers, by and through his attorneys of record,
 22 Henderson City Attorney's Office; Defendant Joseph Lombardo, by and through his attorneys of
 23 record, Nick D. Crosby, Esq. of the law firm of Marquis Aurbach Coffing; and Alexander Perez,
 24 by and through his attorneys of record, North Las Vegas City Attorney's Office, hereby agree
 25 and stipulate that all claims asserted by the Plaintiffs and against Defendants Lombardo, Moers,
 26 and Perez (collectively "Law Enforcement Defendants"), whether known or unknown in the
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above-entitled action, shall be dismissed without prejudice as they relate to the Law Enforcement Defendants.

It is further agreed that the Plaintiffs and the Law Enforcement Defendants shall each bear their own attorneys fees and costs and shall not be subject to any award of attorneys fees, costs or damages arising from the above-entitled action.

It is further agreed that the Law Enforcement Defendants will be subject to and shall abide by any injunction, declaratory relief granted or order of the Nevada Supreme Court or District Court in the above-entitled action, provided, however, the Law Enforcement Defendants shall not be liable for any damages ordered in any such order, decree or judgment, including any award of attorneys fees or costs.

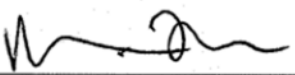
It is further ordered that Plaintiffs, through their counsel of record, shall immediately, or as soon as reasonably possible, notify the Law Enforcement Defendants of any order, injunction or decree or modification of any such order, injunction or decree issued in the above-captioned matter, including any order, injunction, or decree issued by the Nevada Supreme Court.

IT IS SO STIPULATED this ___ day of September, 2015.

PLAINTIFFS

Robert M. Draskovich, Esq.
Nevada State Bar No. 6275
Gary A. Modafferi, Esq.
Nevada State Bar No. 12450
815 S. Casino Center Blvd.
Las Vegas, Nevada 89101
Attorney for Plaintiffs

HENDERSON CITY ATTORNEY'S OFFICE



Josh M. Reid, Esq.
Nevada State Bar No. 7497
Michael J. Oh, Esq.
Nevada State Bar No. 7470
240 Water Street, 4th Floor
Henderson, Nevada 89015
Attorneys for Defendant Patrick E. Moers

1 above-entitled action, shall be dismissed without prejudice as they relate to the Law
2 Enforcement Defendants.

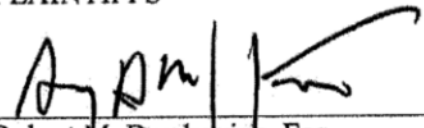
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7 abide by any injunction, declaratory relief granted or order of the Nevada Supreme Court or
8 District Court in the above-entitled action, provided, however, the Law Enforcement Defendants
9 shall not be liable for any damages ordered in any such order, decree or judgment, including any
10 award of attorneys fees or costs.

11 It is further ordered that Plaintiffs, through their counsel of record, shall immediately, or
12 as soon as reasonably possible, notify the Law Enforcement Defendants of any order, injunction
13 or decree or modification of any such order, injunction or decree issued in the above-captioned
14 matter, including any order, injunction, or decree issued by the Nevada Supreme Court.

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1 MARQUIS AURBACH COFFING

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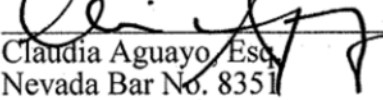
3 Nick D. Crosby, Esq.
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6 Las Vegas, Nevada 89145
7 Attorney for Joseph Lombardo

6

7 NORTH LAS VEGAS CITY
8 ATTORNEY'S OFFICE

ATTORNEY GENERAL'S OFFICE

8

9 By: 
10 Claudia Aguayo, Esq.
11 Nevada Bar No. 8351
12 2250 North Las Vegas Blvd
13 North Las Vegas, NV 89030
14 Attorney for Alexander Perez

9 By: _____
10 Kimberly A. Buchanan, Esq.
11 Nevada Bar No. 5891
12 555 E. Washington Street, Ste. 3900
13 Las Vegas, NV 89101
14 Attorney for Adam Paul Laxalt,
15 Attorney General; Chris Perry, Natalie
16 Wood and Patrick J. Conmay, Nevada
17 Department of Public Safety

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14 **ORDER**

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16 IT IS SO ORDERED that Defendant Joseph Lombardo, Defendant Patrick E. Moers, and
17 Defendant Alexander Perez are hereby dismissed from United States District Court, District of
18 Nevada, Case 15-cv-01638, without prejudice pursuant to the above stipulation.

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19 IT IS SO ORDERED:

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21 RICHARD F. BOULWARE, II
22 United States District Judge

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23 DATED this 25th day of January, 2016.

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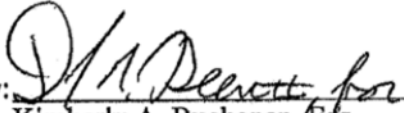
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Attorney for Adam Paul Laxalt,
Attorney General; Chris Perry, Natalie
Wood and Patrick J. Conmay, Nevada
Department of Public Safety

ORDER

IT IS SO ORDERED that Defendant Joseph Lombardo, Defendant Patrick E. Moers, and Defendant Alexander Perez are hereby dismissed from United States District Court, District of Nevada, Case 15-cv-01638, without prejudice pursuant to the above stipulation.

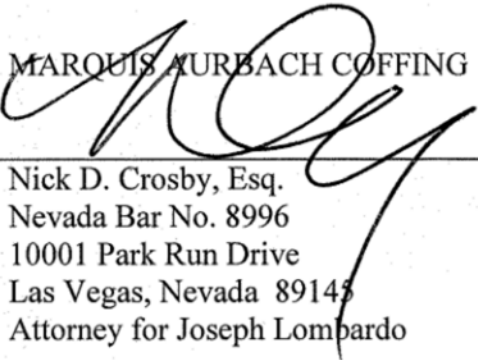
DISTRICT COURT JUDGE

MARQUIS AURBACH COFFING

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ORDER

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DISTRICT COURT JUDGE