Elayna J. Youchah, Bar #5837 youchahe@jacksonlewis.com **JACKSON LEWIS P.C.** 3800 Howard Hughes Pkwy, Suite 600 Las Vegas, Nevada 89169 3 Tel: (702) 921-2460 Fax: (702) 921-2461 4 Attorneys for Defendant 5 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA 8 DAWN STARRETT, an individual, Case No.: 2:15-CV-02490-JAD-VCF 9 Plaintiff. 10 STIPULATION AND ORDER TO v. 11 ARBITRATE AND STAY NATIONAL SECURITY TECHNOLOGIES. **PROCEEDINGS** 12 LLC, a limited liability company; EMPLOYEE(S)/AGENTS(S) DOES I-X; and 13 ROE CORPORATIONS 11-20, inclusive, 14 Defendant. 15 This stipulation is entered into by the parties, Dawn Starrett ("Plaintiff") and National 16 Security Technologies, LLC ("Defendant"), by and through their counsel, with reference to the 17 following: 18 WHEREAS, during the course of her employment with Defendant, Plaintiff entered into 19 an agreement with Defendant pursuant to Defendant's dispute resolution program to arbitrate all 20 21 disputes arising out of or relating to Plaintiff's employment, or cessation of employment, with 22 Defendant (hereinafter the "Arbitration Agreement"); WHEREAS, on September 30, 2015, Plaintiff filed a Complaint in the Eighth Judicial 23 24 District Court, Clark County, Nevada, which Defendant removed to this Court pursuant to 28 U.S.C. § 1331, styled Dawn Starrett v. National Security Technologies, LLC, Case No. 2:15-cv-25 26 02490-JAD-VCF, alleging sex discrimination and retaliation under Title VII and Nevada state 27 law, and age discrimination under the ADA and Nevada state law (hereinafter the "Action");

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| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20 | IT IS HEREBY STIPULATED by and between Plaintiff and Defendant as follows:  1. The Action, in its entirety, shall be submitted to binding arbitration;  2. All proceedings in this Action shall be stayed and this Court shall retain jurisdiction over this Action pending the conclusion of the arbitration.  Dated this 29th day of February, 2016.  JACKSON LEWIS P.C. GABROY LAW OFFICE  /s/ Elayna J. Youchah Elayna J. Youchah Elayna J. Youchah, Bar #5837 3800 Howard Hughes Parkway, Ste. 600 Las Vegas, Nevada 89169  Attorneys for Defendant  It is defended to binding arbitration;  2. All proceedings in this Action shall be stayed and this Court shall retain jurisdiction over this Action pending the conclusion of the arbitration.  GABROY LAW OFFICE  /s/ Christian Gabroy Christian Gabroy, Bar #8805 Ivy Hensel, Bar #13502 170 S. Green Valley Pkwy, Ste. 280 Henderson, Nevada 89012 |
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| 6   .   | jurisdiction over this Action pending the conclusion of the arbitration.  Dated this 29th day of February, 2016.  JACKSON LEWIS P.C.  GABROY LAW OFFICE   /s/ Elayna J. Youchah Elayna J. Youchah, Bar #5837 S3800 Howard Hughes Parkway, Ste. 600 Las Vegas, Nevada 89169  Attorneys for Defendant  CABROY LAW OFFICE  /s/ Christian Gabroy Christian Gabroy, Bar #8805 Ivy Hensel, Bar #13502 170 S. Green Valley Pkwy, Ste. 280 Henderson, Nevada 89012  |
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| 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                               | /s/ Elayna J. Youchah Elayna J. Youchah, Bar #5837 3800 Howard Hughes Parkway, Ste. 600 Las Vegas, Nevada 89169 Attorneys for Defendant  /s/ Christian Gabroy Christian Gabroy, Bar #8805 Ivy Hensel, Bar #13502 170 S. Green Valley Pkwy, Ste. 280 Henderson, Nevada 89012   |
| 10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                                    | Elayna J. Youchah, Bar #5837  3800 Howard Hughes Parkway, Ste. 600  Las Vegas, Nevada 89169  Attorneys for Defendant  Christian Gabroy, Bar #8805  Ivy Hensel, Bar #13502  170 S. Green Valley Pkwy, Ste. 280  Henderson, Nevada 89012  |
| 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20  | Elayna J. Youchah, Bar #5837  3800 Howard Hughes Parkway, Ste. 600  Las Vegas, Nevada 89169  Attorneys for Defendant  Christian Gabroy, Bar #8805  Ivy Hensel, Bar #13502  170 S. Green Valley Pkwy, Ste. 280  Henderson, Nevada 89012  |
| 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20  | 3800 Howard Hughes Parkway, Ste. 600 Las Vegas, Nevada 89169 Las Vegas, Nevada 89169 Ivy Hensel, Bar #13502 170 S. Green Valley Pkwy, Ste. 280 Henderson, Nevada 89012  Attorneys for Defendant   |
| 12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20  | Henderson, Nevada 89012 Attorneys for Defendant   |
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| 16<br>17<br>18<br>19<br>20  | ODDED   |
| 17<br>18<br>19<br>20  | ORDER  Based on the parties' stipulation [ECF 13] and good cause appearing, IT IS   |
| 17<br>18<br>19<br>20  | HEREBY ORDERED that this case is STAYED pending the conclusion of the   |
| 19<br>20  | arbitration. The parties must file a joint status update with the court: (1) no   |
| 20  | later than 30 days after the arbitration date is scheduled, advising the court of   |
|   | the scheduled arbitration date; and (2) no later than 30 days after the hearing is  |
| 21  | held, advising the court that the hearing has concluded and when a decision is  |
|   | anticipated.  |
| 22  | Dated: February 29, 2016.   |
| 23  | Moder   |
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| 25  | UNITED STATES DISTRICT JUDGE  |
| 26  | UNITED STATES DISTRICT JUDGE  |
| 27  | UNITED STATES DISTRICT JUDGE  |
| 23<br>24<br>25  | Dated: February 29, 2016.   |

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