

1 MARK E. FERRARIO
 Nevada Bar No. 1625
 2 ferrariom@gtlaw.com
 KARA B. HENDRICKS
 3 Nevada Bar No. 7743
 hendricksk@gtlaw.com
 4 GREENBERG TRAUIG, LLP
 3773 Howard Hughes Parkway, Suite 400 North
 5 Las Vegas, Nevada 89169
 Telephone: (702) 792-3773
 6 Fax: (702) 792-9002

7 *Counsel for Defendant*
 8 *Clark County School District*

9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

11 JOHN and JANE DOE I, Guardians Ad Litem
 12 for JOANN DOE I, a minor, individually and
 13 on behalf of all those similarly situated, and
 JOHN and JANE DOE II, Guardians Ad Litem
 14 for JOANN DOE II, a minor, individually and
 15 on behalf of all those similarly situated;

Case No. 2:16-cv-00239-APG-PAL

16 Plaintiffs,

17 vs.

**[PROPOSED] STIPULATION AND
 ORDER TO VACATE JUNE 19, 2018
 HEARING AND
 STAY CASE FOR 60 DAYS**

18 JEREMIAH MAZO; CLARK COUNTY
 19 SCHOOL DISTRICT; DOES 1 through 20;
 20 DOE 1 through 20; ROE CORPORATIONS 1
 21 through 20;

22 Defendants.

23 The parties are currently in settlement negotiations and have agreed to vacate the hearing
 24 scheduled for June 19, 2018 and delay the taking of the limited remaining depositions in this case to
 25 help facilitate settlement discussions and reserve resources. In light of this agreement, Plaintiffs,
 26 JOHN and JANE DOE I, GUARDIANS AD LITEM FOR JOANN DOE I, A MINOR AND JOHN
 27 AND JANE DOE II, GUARDIANS AD LITEM FOR JOANN DOE II, A MINOR (collectively,
 28 “Plaintiffs”), Defendant CLARK COUNTY SCHOOL DISTRICT (“CCSD”), by and through their
 respective counsel of record, hereby jointly submit this proposed stipulation extending certain case

1 deadlines for the approval of the Court.

2 **STIPULATION**

3 The Parties hereby stipulate and agree to vacate the hearing regarding Plaintiffs' Motion for
4 Protective Order (Doc. No. 78) currently scheduled for June 19, 2018 at 10:00 a.m.

5 It is further stipulated and agreed pursuant to Local Rule 6-1, that the case be stayed for a
6 period of 60 days and the current discovery deadlines adjusted accordingly. The current deadlines
7 are as follows:

8	Discovery Cut-Off Date:	June 30, 2018
9	Dispositive Motions:	July 30, 2018
10	Proposed Joint Pretrial Order:	August 29, 2018 or 30 days after
11		the Court rules on any
12		dispositive motions.

13 **I. Background**

14 This case was filed on February 5, 2016, alleging abuse of students by a former CCSD
15 teacher, Jeremiah Mazo, and bringing claims under Title IX against CCSD and state tort claims
16 against all defendants. (Doc. 1). Plaintiffs filed a First Amended Class Action Complaint on March
17 1, 2017. (Doc. 39). CCSD filed its Answer to the First Amended Class Action Complaint on March
18 16, 2017, and asserted cross-claims against Defendant Mr. Mazo. (Doc. 43). Mr. Mazo filed an
19 Answer to the Plaintiffs' First Amended Class Action Complaint on June 2, 2017 and his answer to
20 CCSD's Cross-Claims on July 6, 2017 (Doc. Nos. 61, 67).

21 **II. Discovery Completed**

22 **Plaintiffs have served Defendant Clark County School District with the following**
23 **discovery to date:**

- 24 1. Plaintiffs' Early Case Conference List of Documents and Witnesses Pursuant to
25 FRCP 26(F) served 10/10/2016;
- 26 2. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and
27 Jane Doe II, Guardians ad Litem for Joann Doe II's First set of Request of

- 1 Production of Documents served 10/27/16;
- 2 3. Plaintiffs' First Supplement to Early Case Conference List of Documents and
- 3 Witnesses Pursuant to FRCP 26(F) served 12/14/2016;
- 4 4. Plaintiff Jane Doe I as Guardian ad Litem for Joann Doe I's Responses to Clark
- 5 County School District's First set of Interrogatories served 12/14/2016;
- 6 5. Plaintiff Joann Doe I's Responses to Clark County School District's First set of
- 7 Interrogatories served 12/14/2016;
- 8 6. Plaintiff John Doe I as Guardian ad Litem for Joann Doe I's Responses to Clark
- 9 County School District's First set of Interrogatories served 12/14/2016;
- 10 7. Plaintiffs John and Jane Doe I as Guardians ad Litem for Joann Doe I's Responses to
- 11 Clark County School District's First set of Request for Production of Documents
- 12 served 12/14/2016;
- 13 8. Plaintiff Jane Doe II as Guardian ad Litem for Joann Doe II's Responses to Clark
- 14 County School District's First set of Interrogatories served 12/14/2016;
- 15 9. Plaintiff Joann Doe II's Responses to Clark County School District's First set of
- 16 Interrogatories served 12/14/2016;
- 17 10. Plaintiff John Doe II as Guardian ad Litem for Joann Doe II's Responses to Clark
- 18 County School District's First set of Interrogatories served 12/14/2016;
- 19 11. Plaintiffs John and Jane Doe II as Guardians ad Litem for Joann Doe II's Responses
- 20 to Clark County School District's First set of Request for Production of Documents
- 21 served 12/14/2016;
- 22 12. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and
- 23 Jane Doe II, Guardians ad Litem for Joann Doe II's Second set of Requests for
- 24 Production of Documents served 01/18/2017;
- 25 13. Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of
- 26 Requests for Admission served 01/18/2017;
- 27 14. Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of
- 28

- 1 Interrogatories served 01/18/2017;
- 2 15. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of
- 3 Interrogatories served 01/18/2017;
- 4 16. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of
- 5 Requests for Admission served 01/18/2017;
- 6 17. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and
- 7 Jane Doe II, Guardians ad Litem for Joann Doe II's Third set of Requests for
- 8 Production of Documents served 01/20/2017;
- 9 18. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's Second set of
- 10 Interrogatories served 01/23/2017;
- 11 19. Plaintiffs' Second Supplement to Early Case Conference List of Documents and
- 12 Witnesses Pursuant to FRCP 26(F) served 02/10/17;
- 13 20. Plaintiff Joann Doe II's Supplemental Responses to CCSD's First set of
- 14 Interrogatories served on 03/01/17;
- 15 21. Plaintiff Joann Doe I's Supplemental Responses to CCSD's First set of
- 16 Interrogatories served on 03/01/17;
- 17 22. Plaintiffs' Third Supplement to Early Case Conference List of Documents and
- 18 Witnesses Pursuant to FRCP 26(F) served 05/31/17;
- 19 23. Plaintiffs' Fourth Supplement to Early Case Conference List of Documents and
- 20 Witnesses Pursuant to FRCP 26(F) served 07/07/17;
- 21 24. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Third Set of
- 22 Interrogatories to CCSD served 07/11/17;
- 23 25. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Fourth Set of
- 24 Interrogatories to CCSD served 08/22/17;
- 25 26. Plaintiffs' Fifth Supplement to Early Case Conference List of Documents and
- 26 Witnesses Pursuant to FRCP 26(F) served 10/11/17;
- 27 27. Plaintiffs' Expert Designation Pursuant to FRCP 26(A)(2) served 10/13/17.

- 1 16. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a
- 2 Minor's First set of Interrogatories to CCSD served 02/27/17;
- 3 17. CCSD's Responses to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a
- 4 Minor's First set of Interrogatories to CCSD served 02/27/17;
- 5 18. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a
- 6 Minor's Second set of Interrogatories to CCSD served 03/10/17;
- 7 19. CCSD's Fourth Supplemental Disclosures Pursuant to FRCP 26(a)(1) and Pursuant
- 8 to March 6, 2017 Order served 04/05/17;
- 9 20. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a
- 10 Minor's Third set of Interrogatories to CCSD served 07/24/17;
- 11 21. CCSD's Fourth Supplemental Disclosures served 08/21/17;
- 12 22. CCSD's Responses to Plaintiff Jon Doe I, as Guardian ad Litem for Joann Doe I, a
- 13 Minor's Fourth set of Interrogatories to CCSD served 09/21/17;
- 14 23. CCSD's Sixth Supplemental Disclosures served 09/01/2017;
- 15 24. CCSD's Seventh Supplemental Disclosures served 10/13/17;
- 16 25. CCSD's Expert Witness Disclosures served 10/13/17.

17 **The following depositions have been completed to date:**

- 18 1. Ulandra Barnett
- 19 2. Ivy Burns
- 20 3. Sylvia Glass
- 21 4. Jennifer Mattiello
- 22 5. Nestor Mattiello
- 23 6. Jon Okazaki
- 24 7. Julia Pettit
- 25 8. Kristopher Pettit
- 26 9. Christine Prosen
- 27 10. Darrin Puana

1 11. Billie Rayford

2 12. Joann Lippert

3 **III. Discovery That Remains to be Completed**

4 1. Depositions of Plaintiffs Joann Doe I and Joann Doe II;¹ and

5 2. Certain Expert Depositions²

6 **IV. Basis for Extension**

7 The parties request this stay and extension of discovery to allow the depositions of Joann
8 Doe I, Joann Doe II (subject to Motion for Protective Order), and certain of the parties' expert
9 witnesses to take place should settlement negotiations come to an impasse. The parties have
10 diligently engaged in discovery and want to avoid incurring any additional expense at this time.
11 Accordingly, the parties request a 60 day stay of this matter, request that the June 19, 2018 hearing
12 be vacated and request an extension to allow for the foregoing outstanding discovery to be
13 completed 60 days from the current deadlines as detailed below.

14 **V. Proposed Modification**

15 Based on the foregoing, the parties jointly seek a modification of the current deadlines as
16 follows:

- 17 1. **Current Deadlines:**
- | | |
|---------------------------------------|---|
| Discovery Cut-Off Date: | June 30, 2018 |
| Dispositive Motions: | July 30, 2018 |
| Proposed Joint Pretrial Order: | August 29, 2018 or 30 days
after the Court rules on any
dispositive motions. |
- 21 2. **Proposed Deadlines:**
- | | |
|---------------------------------------|------------------------------------|
| Discovery Cut-Off Date: | August 29, 2018 |
| Dispositive Motions: | September 28, 2018 |
| Proposed Joint Pretrial Order: | October 29, 2018 or 30 days |

26 ¹ The ability for such deposition to go forward is the subject of Plaintiff's Motion for Protective Order (Doc. No. 78).
27 ² Defendants have taken the deposition of Plaintiffs' expert Joann Lippert. The parties scheduled the depositions of
28 experts Terrence Clauretje, Edward Dragan, Peter Loehr and Brett Sokolow for the latter part of June, but agree to
continue such depositions to allow for settlement discussions.

after the Court rules on any dispositive motions.

3. This request is made in good faith and not for the purposes of delay.

IT IS SO STIPULATED.

Dated this 12th day of June, 2018.

Dated this 12th day of June 2018.

GREENBERG TRAUERIG, LLP

EGLET PRINCE

/s/ Kara B. Hendricks

/s/ Artemus W. Ham

MARK E. FERRARIO, ESQ. (NV BAR 1625)
KARA B. HENDRICKS, ESQ. (NV BAR 7743)
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, Nevada 89169
Attorneys for Defendant Clark County School District

ROBERT T. EGLET, ESQ. (NV BAR 3402)
ARTEMUS W. HAM, ESQ. (NV BAR 7001)
AARON D. FORD, ESQ. (NV BAR 7704)
400 S. 7th Street, 4th Floor
Las Vegas, Nevada 89101
Attorneys for Plaintiffs

-and-

HALL JAFFE & CLAYTON, LLP
STEVEN T. JAFFE, ESQ. (NV BAR 7035)
7425 Peak Drive
Las Vegas, Nevada 89128
Attorneys for Defendant Clark County School District

ORDER

IT IS HEREBY ORDERED.

DATED this 13th day of June, 2018.


UNITED STATES MAGISTRATE JUDGE

Greenberg Traurig, LLP
3773 Howard Hughes Parkway - Suite 400 North
Las Vegas, Nevada 89169
(702) 792-3773
(702) 792-9002 (fax)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28