

1 RAMZY PAUL LADAH
 Nevada Bar No. 11405
 2 ANTHONY ASHBY
 Nevada Bar No. 4911
 3 JOSEPH C. CHU
 Nevada Bar No. 11082
 4 **LADAH LAW FIRM**
 517 S. Third Street
 5 Las Vegas, NV 89101
 litigation@ladahlaw.com
 6 T: 702.252.0055
 F: 702.248.0055
 7 *Attorneys for Plaintiffs Jane Doe and Joann Doe*

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

10 JANE DOE, individually, and as parent and
 11 natural guardian for JOANN DOE, a minor;

Case No.: 2:16-cv-01696-JAD-PAL

12 Plaintiff,

13 vs.

14 FAUSTO BARRAZA-BALCAZAR; CLARK
 COUNTY SCHOOL DISTRICT; DOES 1
 15 through 20; ROE CORPORATIONS 1 through
 20,

**STIPULATION AND ORDER TO FILE
 SECOND AMENDED COMPLAINT**

16 Defendants.
 17

18 The parties, through their undersigned counsel of record, hereby stipulate and agree to
 19 allow Plaintiffs JANE DOE and JOANN DOE (“Plaintiffs”) to file Plaintiffs’ [proposed] Second
 20 Amended Complaint, a copy of which is attached hereto as **Exhibit “1”**. This stipulation is
 21 being entered into by the parties’ undersigned counsel of record pursuant to Fed. R. Civ. P.
 22 15(a)(2). Plaintiffs respectfully request that, pursuant to this stipulation, they be granted leave of
 23 Court to amend their existing pleading.¹ If leave is so granted, Plaintiffs will then file and serve
 24 their [proposed] Second Amended Complaint pursuant to LR 15-1(b).

25 Nothing herein is intended to waive any defense in this matter.

26 ...

27
 28 ¹ Plaintiffs’ existing pleading, the First Amended Complaint, was filed in state court prior
 to removal, thus there is no federal case docket number assigned thereto.



1 DATED this 1st day of September, 2016

DATED this 1st day of September, 2016

2 **LADAH LAW FIRM**

**CLARK COUNTY SCHOOL DISTRICT,
OFFICE OF THE GENERAL COUNSEL**

3 */s/ Joseph C. Chu, Esq.*

/s/ S. Scott Greenberg, Esq.

4 **JOSEPH C. CHU**

Nevada Bar No. 11082

5 517 S. Third Street

Las Vegas, NV 89101

6 *Attorneys for Plaintiffs Jane Doe
and Joann Doe*

S. SCOTT GREENBERG

Nevada Bar No. 4622

5100 West Sahara Avenue

Las Vegas, NV 89146

*Attorneys for Defendant Clark
County School District*

8

9

ORDER

10

Based upon the foregoing stipulation of the parties, Plaintiffs Jane Doe and Joann Doe
11 are hereby granted leave to file their Second Amended Complaint by September, 9, 2016.

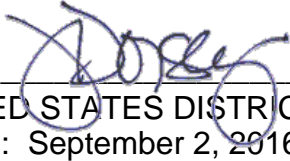
11

12

IT IS SO ORDERED.

13

14


UNITED STATES DISTRICT JUDGE
Dated: September 2, 2016.

15

16

17

18

19

20

21

22

23

24

25

26

27

28

LADAH LAW
— F I R M —

