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7 *Attorneys for Defendants*  
 Las Vegas-Clark County Library District and  
 8 Ronald R. Heezen

9  
 10 UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA  
 11

12 WILLIAM DEANS, an individual,  
 13  
 Plaintiff,

Case No. 2:16-cv-02405-APG-PAL

14 vs.

15 LAS VEGAS CLARK COUNTY LIBRARY  
 DISTRICT; RONALD R. HEEZEN, (in his  
 16 official capacity); COLLEGE OF SOUTHERN  
 NEVADA; ANTONIA MARIE SUMMERLIN  
 17 (Badge No. 228) (in her personal and official  
 capacity); RANDALL PERKINS (Badge No.  
 18 104) (in his professional capacity); JANE DOE;  
 JOHN ROE; and JANE POE,  
 19  
 Defendants.  
 20

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

22 Pursuant to FRCP 15, LR 7-1, and LR IA 6-2, Defendants Las Vegas-Clark County Library  
 23 District (“Library District”), Ronald R. Heezen (“Heezen”), College of Southern Nevada (“CSN”),  
 24 Antonia Marie Summerlin (“Summerlin”), and Randal Perkins (“Perkins”) (collectively, the  
 25 “Defendants”); and Plaintiff William Deans (“Deans” or “Plaintiff”)<sup>1</sup> by and through their counsel of  
 26 record, hereby submit this stipulation permitting Deans to file an Amended Complaint and setting  
 27 Defendants’ time to respond to the Amended Complaint.

28 <sup>1</sup> Deans and Defendants shall be referred to collectively as the “Parties.”

**BAILEY ❖ KENNEDY**  
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1           1.       WHEREAS, Deans filed his Complaint [ECF No. 1] and an Emergency Motion for  
2 Temporary Restraining Order and Motion for Preliminary Injunction [ECF No. 3] on October 15,  
3 2016;

4           2.       WHEREAS, the Court held a hearing on Deans' Motion for Temporary Restraining  
5 Order on October 17, 2016, and granted the Motion in part (*see* Minutes of Proceedings [ECF No.  
6 7]);

7           3.       WHEREAS, at the hearing on Deans' Motion for Temporary Restraining Order, the  
8 Court further ordered a briefing schedule on Deans' Motion for Preliminary Injunction and set an  
9 evidentiary hearing to take place on November 1, 2016;

10          4.       WHEREAS, at the November 1, 2016 hearing on Deans' Motion for Preliminary  
11 Injunction, the Court heard arguments of counsel, heard testimony of witnesses, and admitted  
12 exhibits;

13          5.       WHEREAS, at the conclusion of the November 1, 2016 hearing, the Court took the  
14 matter under advisement and ordered that the temporary restraining order remain in effect subject to  
15 additional restrictions pending further order of the Court (*see* Minutes of Proceedings [ECF No.  
16 21]);

17          6.       WHEREAS, Deans wishes to amend his Complaint based on the evidence and  
18 argument offered at the November 1, 2016 hearing; and

19          7.       WHEREAS, the Parties wish to make efficient use of the Parties' and judicial  
20 resources;

21          8.       THE PARTIES HEREBY STIPULATE AND AGREE AS FOLLOWS:

- 22               a. Deans shall file an Amended Complaint within twenty (20) days of the filing  
23               of the Court's order on Dean's Motion for Preliminary Injunction.
- 24               b. Defendants need not respond to the October 15, 2016 Complaint, and instead,  
25               shall have up to and including twenty (20) days to respond to the Amended  
26               Complaint.

27       ///

28       ///

1 c. Notwithstanding this Stipulation, Defendants reserve the right to assert any all  
2 defenses under FRCP 12 and all other applicable law.

3  
4 Dated: November 7, 2016

Dated: November 7, 2016

Dated: November 7, 2016

5 By: /s/ Marc J. Randazza  
6 **RANDAZZA LEGAL**  
7 **GROUP, PLLC**  
8 MARC J. RANDAZZA  
ALEX J. SHEPARD  
D. GILL SPERLEIN

By: /s/ Kelly B. Stout  
**BAILEY❖KENNEDY**  
DENNIS L. KENNEDY  
KELLY B. STOUT

By: /s/ Richard L. Hinckley  
**COLLEGE OF**  
**SOUTHERN NEVADA**  
RICHARD L. HINCKLEY  
DIANE L. WELCH

9 *Attorneys for Plaintiff*  
WILLIAM DEANS

*Attorneys for Defendants*  
LAS VEGAS-CLARK  
COUNTY LIBRARY  
DISTRICT and RONALD R.  
HEEZEN

*Attorneys for Defendants*  
COLLEGE OF SOUTHERN  
NEVADA; ANTONIA MARIE  
SUMMERLIN; and  
RANDALL PERKINS

11  
12  
13 IT IS SO ORDERED:

14   
15 \_\_\_\_\_  
UNITED STATES DISTRICT COURT JUDGE

16 Dated: November 8, 2016  
17 \_\_\_\_\_

18 Respectfully Submitted by:

19 BAILEY❖KENNEDY

20 By: /s/ Kelly B. Stout  
21 DENNIS L. KENNEDY  
KELLY B. STOUT

22 *Attorneys for Defendants*  
23 LAS VEGAS-CLARK COUNTY  
24 LIBRARY DISTRICT and RONALD R.  
HEEZEN