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**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

8 KRISTIN TRUEMAN, an Individual,  
 9  
 10 Plaintiff,

11 vs.

12 CLARK COUNTY, a political subdivision of  
 the State of Nevada; DOES I - X; and ROE  
 13 CORPORATIONS I-X, inclusive,

14 Defendants.  
 15  
 16

Case No.: 2:16-cv-02558-JCM-CWH  
 Hon. James C. Mahan

**STIPULATION AND ORDER TO STAY  
 DISCOVERY**

**(FIRST REQUEST)**

**Related Case: Case No. 2:15-cv-01872-RFB-  
 NJK**

17 KRISTIN TRUEMAN (“Trueman”), by and through her counsel of record, Ryan Alexander,  
 18 and Defendant CLARK COUNTY by and through its counsel Robert J. Gower, Esq., respectfully  
 19 move for the entry of the attached proposed Stipulation for a Limited Stay of Discovery until such  
 20 time that Defendant’s Motion to Dismiss may be heard and decided.

21 The Complaint in this case was filed on November 4, 2016. A subsequent Motion to Dismiss  
 22 was filed by Defendant CLARK COUNTY on December 21, 2016. There is also a pending Motion  
 23 to Dismiss in related case 2:15-cv-01872-RFB-NJK that could be dispositive of the case. The parties  
 24 agree that a stay of discovery proceedings until Defendant’s Motion to Dismiss would be beneficial  
 25 to the Parties and conserve efficient use of the Court’s resources while the Motion to Dismiss is  
 26 decided. The parties shall confer and submit their Discovery Plan and Scheduling Order within  
 27 twenty (20) days of the ruling on the Defendant’s Motion to Dismiss.  
 28

1  
2 KRISTIN TRUEMAN (“Trueman”), by and through her counsel of record, Ryan Alexander,  
3 and Defendant CLARK COUNTY by and through its counsel Robert F. Gower, Esq,

4 **HEREBY STIPULATE AND AGREE** that the deadline for Plaintiff and Defendant to hold  
5 their Rule 26(f) conference and file their proposed Discovery Plan and Scheduling Order, and any  
6 other FRCP 26(f) duties, be stayed until this Court rules on Defendant’s Motion to Dismiss;

7 This stay is not brought in bad faith or for purposes of delay.

8 **IT IS SO STIPULATED.**

9 DATED this 9th day of February, 2017.

10  
11 RYAN ALEXANDER, CHTD.

CLARK COUNTY DISTRICT ATTORNEY'S  
OFFICE - CIVIL DIVISION

12 /s/Ryan Alexander

13 /s/Robert J. Gower, Esq.

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Email: Robert.Gower@ClarkCountyDA.com  
*Attorneys for Defendants LVMPD and Former  
Sheriff Doug Gillespie*

22 **IT IS SO ORDERED:**

23 The parties’ stipulation to stay all FRCP 26(f) duties, including submission of a proposed  
24 Discovery Plan and Scheduling Order, until after an Order is entered on Defendant’s Motion to  
25 Dismiss, is granted. The parties shall confer and submit their Discovery Plan and Scheduling Order  
26 within twenty (20) days of the ruling on the Defendant’s Motion to Dismiss.

27 DATED: 2/10/17  
28 \_\_\_\_\_

  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Ryan Alexander Chtd., and on the 9th day of February 2017, the foregoing STIPULATION AND ORDER TO STAY DISCOVERY was served by CM/ECF system upon:

Robert J. Gower, Esq.  
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Civil Division  
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*Attorney for Defendants Clark County*

*/s/Ryan Alexander*

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An Employee of Ryan Alexander, Chtd.