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 7 Police Department, Rogers, Sanchez, Torres, Brown,
 Patimeteeporn, Senior, Trost, Verduzco, Binko,
 8 Reynolds, Johnson, Williams, Sgt. Mark Hopkins,
 Officer Kaluna Aki, Officer Jamie Joiner, Officer
 9 Mecham and Officer Juan Sanchez

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 JOSHUA CRITTENDON,

Plaintiff,

14 vs.

15 JOE LOMBARDO, et al.,

Defendants.

Case Number:
 2:17-cv-01700-RFB-BNW

**STIPULATION AND ORDER TO STAY
 DISCOVERY AND OTHER
 DEADLINES PENDING SETTLEMENT
 DISCUSSIONS**

(FIRST REQUEST)

MARQUIS AURBACH
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18 Plaintiff Joshua Crittendon (“Plaintiff”), by and through his counsel of record, Diana
 19 Ebron, Esq., and Defendants, Las Vegas Metropolitan Police Department, Corey Rogers,
 20 Francisco Sanchez, Pablo Torres, Aaron Brown, Kevin Patimeteeporn, Jared Senior,
 21 Nicholas Trost, Leonel Verduzco, Mark Binko, Jesse Reynolds, Anthony Johnson, Jacob
 22 Williams, Sgt. Mark Hopkins, Officer Kaluna Aki, Officer Jamie Joiner, Officer Mecham
 23 and Officer Juan Sanchez (collectively “LVMPD Defendants”), by and through their
 24 attorneys of record, Nicholas Crosby, Esq. and Jackie V. Nichols, Esq., with the law firm of
 25 Marquis Aurbach Coffing, (collectively the “Parties”), and hereby agree and jointly stipulate
 26 the following:
 27

MARQUIS AURBACH

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1 1. During a recent meet and confer conducted on January 11, 2023, the Parties
2 determined that this matter may be appropriate for possible resolution and that a stay of
3 discovery and other deadlines would allow the Parties to explore the possibility of
4 settlement, without incurring the time and expense of ongoing discovery and other work
5 during settlement discussions.

6 2. The Parties agree that all deadlines in this matter be stayed for a forty-five
7 (45) day period. Parties further agree that within fifteen (15) days after completion of the
8 contemplated settlement discussions, if not successful, the parties will submit a stipulated
9 schedule regarding any pending motions or discovery which will extend all applicable dates
10 for the commensurate time period that they were stayed in accordance with Rule 26 of the
11 Federal Rules of Civil Procedure and Rule 26-1 of the Local Rules of the Unites States
12 District Court, for the Court’s approval.

13 3. Accordingly, the Parties hereby agree and request the Court to enter a stay of
14 all deadlines in the instant case between LVMPD Defendants and Plaintiff.

15 4. This is the Parties’ first request for a stay of deadlines in this matter.

16 5. Notwithstanding the stay, the Parties intend to and hereby agree to cooperate
17 in the exchange of information as needed to facilitate settlement.

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1 6. The Parties both submit that the instant stipulation is being offered in good
2 faith and not for the purpose of delay.

3 Dated this 17th day of January, 2023

Dated this 17th day of January, 2023

4 **KIM GILBERT EBRON**

MARQUIS AURBACH

5

By: /s/ Diana S. Ebron

By: /s/ Jackie V. Nichols

6

Diana S. Ebron, Esq.

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7

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Vegas Metropolitan Police

14

Pro Bono Attorney for Plaintiff

Department, Rogers, Sanchez,

15

Torres, Brown, Patimeteeporn,

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Senior, Trost, Verduzco, Binko,

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Reynolds, Johnson, Williams, Sgt.

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Mark Hopkins, Officer Kaluna

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Aki, Officer Jamie Joiner, Officer

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Mecham and Officer Juan

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Sanchez

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ORDER

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IT IS ORDERED that ECF No. 325 is GRANTED.

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IT IS FURTHER ORDERED that a notice of settlement or proposed
schedule to complete discovery is due by March 20, 2023.

IT IS SO ORDERED

DATED: 12:56 pm, January 18, 2023



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

MARQUIS AURBACH

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