

1 **Marquis Aurbach**
 Nick D. Crosby, Esq.
 2 Nevada Bar No. 8996
 Jackie V. Nichols, Esq.
 3 Nevada Bar No. 14246
 10001 Park Run Drive
 4 Las Vegas, Nevada 89145
 Telephone: (702) 382-0711
 5 Facsimile: (702) 382-5816
 ncrosby@maclaw.com
 6 jnichols@maclaw.com

Attorneys for Defendants, Las Vegas Metropolitan
 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,
 13 Plaintiff,
 14 vs.
 15 JOE LOMBARDO, et al.,
 16 Defendants.

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

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

(SECOND REQUEST)

MARQUIS AURBACH
 10001 Park Run Drive
 Las Vegas, Nevada 89145
 (702) 382-0711 FAX: (702) 382-5816

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, (collectively the “Parties”), and hereby agree and jointly stipulate the
 26 following:

27 . . .

MARQUIS AURBACH

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 1. The Parties previously agreed to stay the instant case in an attempt to settle
2 this matter.

3 2. Since the stay was entered, the Parties have exchanged offers and believe that
4 this matter is likely to resolve.

5 3. The offer is pending before the Sheriff of the Las Vegas Metropolitan Police
6 Department who has the authority to agree to settlement.

7 4. The Parties anticipate this matter being settled within fourteen (14) days upon
8 the Sheriff’s approval.

9 5. However, once the matter is settled, additional time is need to process the
10 payment, as well as finalize paperwork, including obtaining Plaintiff’s signature on the
11 settlement agreement and a W-9, which is difficult to his incarceration.

12 6. The Parties agree that all deadlines in this matter be stayed for a thirty (30)
13 day period. Parties further agree that within fifteen (15) days after completion of the
14 contemplated settlement discussions, if not successful, the parties will submit a stipulated
15 schedule regarding any pending motions or discovery which will extend all applicable dates
16 for the commensurate time period that they were stayed in accordance with Rule 26 of the
17 Federal Rules of Civil Procedure and Rule 26-1 of the Local Rules of the United States
18 District Court, for the Court’s approval.

19 7. Accordingly, the Parties hereby agree and request the Court to continue the
20 stay of all deadlines in the instant case between LVMPD Defendants and Plaintiff.

21 8. This is the Parties’ second request for a stay of deadlines in this matter.

22 9. Notwithstanding the stay, the Parties intend to and hereby agree to cooperate
23 in the exchange of information as needed to facilitate settlement.

24 ...

25 ...

26 ...

27 ...

1 10. 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 20th day of March, 2023

Dated this 20th day of March, 2023

MARQUIS AURBACH

4
5 By: /s/ Diana S. Ebron

By: /s/ Jackie V. Nichols

6 Diana S. Ebron, Esq.
7 Nevada Bar No. 10580
8 1050 E. Flamingo Road, Suite 107
9 #1252
10 Las Vegas, Nevada 89119
11 *Pro Bono Attorney for Plaintiff*

Nick D. Crosby, Esq.
Nevada Bar No. 8996
Jackie V. Nichols, Esq.
Nevada Bar No. 14246
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendants, Las Vegas
Metropolitan Police Department,
Rogers, Sanchez, Torres, Brown,
Patimeteeporn, Senior, Trost,
Verduzco, Binko, Reynolds, Johnson,
Williams, Sgt. Mark Hopkins, Officer
Kaluna Aki, Officer Jamie Joiner,
Officer Mecham and Officer Juan
Sanchez

ORDER

The above Stipulation is hereby GRANTED.

IT IS SO ORDERED this 21st day of March, 2023.



UNITED STATES DISTRICT COURT
MAGISTRATE JUDGE

MARQUIS AURBACH

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO STAY DISCOVERY AND OTHER DEADLINES PENDING SETTLEMENT DISCUSSIONS (SECOND REQUEST)** with the Clerk of the Court for the United States District Court by using the court’s CM/ECF system on the 20th day of March, 2023.

I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch
An employee of Marquis Aurbach

MARQUIS AURBACH
10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

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