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*Attorneys for Defendants Eagle Quest of Nevada, Inc.,  
Eagle Quest, Ivan Ray Tippetts, Leslie Tippetts,  
Ilia Hampton, LCSW, QMPH, and Trent Hansen, LCSW*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

S.H. JOHN DOE, a minor child, by and through  
his Natural Parent and Legal Guardian, A.O.  
JANE DOE, an Individual; A.O. JANE DOE,  
Individually;  
  
Plaintiffs,  
  
vs.  
  
CLARK COUNTY, a political subdivision of  
the State of Nevada; KEVIN BROWN, an  
Individual; JULIANE HUGHES, an Individual;  
EAGLE QUEST OF NEVADA, INC., a Nevada  
Corporation; EAGLE QUEST, a Nevada  
Domestic Corporation; IVAN RAY TIPPETTS,  
an Individual; LESLIE TIPPETTS, an Individual;  
SHERA WILLIAMS, an Individual; TOMISHA  
HORN, an Individual; ILIA HAMPTON, LCSW,  
QMPH, an Individual; TRENT HANSEN, LCSW,  
an Individual;  
  
Defendants.

CASE NO. 2:17-cv-02380

**STIPULATION AND ORDER TO DISMISS DEFENDANTS  
ILIA HAMPTON AND TRENT HANSEN WITH PREJUDICE**

1 IT IS HEREBY STIPULATED and agreed by and between counsel that:

2 1. ILIA HAMPTON was an employee/agent of EAGLE QUEST and was acting in  
3 the course and scope of her employment at all times during S.H. JOHN DOE's foster care  
4 placement. The parties agree that HAMPTON was acting in her individual and official capacity.

5 2. Defendant EAGLE QUEST is liable for all acts and/or omissions of ILIA  
6 HAMPTON, attributed to her by a finder of fact. This does not mean that Plaintiffs may not  
7 pursue any other Defendants in this litigation on the basis of HANSEN's acts.

8 3. Nothing in this stipulation will limit the evidence admitted at trial of acts and/or  
9 omissions of ILIA HAMPTON. Nor will this stipulation, alone, limit the Plaintiffs' ability to  
10 recover against any other Defendants in this case in any way.

11 4. That Defendant ILIA HAMPTON may be dismissed, with prejudice, from the  
12 instant litigation in case 2:17-cv-02380, with each party to bear their own attorneys' fees and  
13 costs.

14 5. TRENT HANSEN was an employee/agent of EAGLE QUEST and was acting in  
15 the course and scope of his employment at all times during S.H. JOHN DOE's foster care  
16 placement. The parties agree that HANSEN was acting in his individual and official capacity.

17 6. Defendant EAGLE QUEST is liable for all acts and/or omissions of TRENT  
18 HANSEN, attributed to him by a finder of fact. This does not mean that Plaintiffs may not  
19 pursue any other Defendants in this litigation on the basis of HANSEN's acts.

20 7. Nothing in this stipulation will limit the evidence admitted at trial of acts and/or  
21 omissions of TRENT HANSEN. Nor will this stipulation, alone, limit the Plaintiffs' ability to  
22 recover against any other Defendants in this case in any way.

23 . . . .

1 8. That Defendant TRENT HANSEN may be dismissed, with prejudice, from the  
2 instant litigation in case 2:17-cv-02380, with each party to bear their own attorneys' fees and  
3 costs.

4 **IT IS SO STIPULATED.**

5 DATED this 10<sup>th</sup> day of January, 2018.

DATED this 10<sup>th</sup> day of January, 2018.

6 LAGOMARSINO LAW

HALL PRANGLE & SCHOONVELD, LLC

7 */s/: Andre Lagomarsino, Esq.*

*/s/: John Bemis, Esq.*

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ANDRE M. LAGOMARSINO, ESQ.  
9 Nevada Bar No. 6711  
10 Melanie L. Thomas, Esq.  
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*Attorneys for Defendants Eagle Quest of  
Nevada, Inc., Eagle Quest, Ivan Ray Tippetts,  
Leslie Tippetts, Ilia Hampton, LCSW, QMPH,  
and Trent Hansen, LCSW*

15 DATED this 10<sup>th</sup> day of January, 2018.

16 OLSON, CANNON, GORMLEY,  
17 ANGULO & STOBERSKI

18 */s/: Thomas Dillard, Jr., Esq.*

---

THOMAS D. DILLARD, JR. ESQ.  
19 Nevada Bar No. 6270  
20 9950 W. Cheyenne Ave.  
21 Las Vegas, NV 89129  
22 *Attorneys for Defendants  
Clark County, Kevin Brown and  
Juliane Hughes*

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**ORDER**

Pursuant to the foregoing stipulation of counsel for the moving parties, and good cause appearing therefore,

1. ILIA HAMPTON was an employee/agent of EAGLE QUEST and was acting in the course and scope of her employment at all times during S.H. JOHN DOE's foster care placement. The parties agree that HAMPTON was acting in her individual and official capacity.

2. Defendant EAGLE QUEST is liable for all acts and/or omissions of ILIA HAMPTON, attributed to her by a finder of fact. This does not mean that Plaintiffs may not pursue any other Defendants in this litigation on the basis of HANSEN's acts.

3. Nothing in this stipulation will limit the evidence admitted at trial of acts and/or omissions of ILIA HAMPTON. Nor will this stipulation, alone, limit the Plaintiffs' ability to recover against any other Defendants in this case in any way.

4. That Defendant ILIA HAMPTON may be dismissed, with prejudice, from the instant litigation in case 2:17-cv-02380, with each party to bear their own attorneys' fees and costs.

5. TRENT HANSEN was an employee/agent of EAGLE QUEST and was acting in the course and scope of his employment at all times during S.H. JOHN DOE's foster care placement. The parties agree that HANSEN was acting in his individual and official capacity.

6. Defendant EAGLE QUEST is liable for all acts and/or omissions of TRENT HANSEN, attributed to him by a finder of fact. This does not mean that Plaintiffs may not pursue any other Defendants in this litigation on the basis of HANSEN's acts.

7. Nothing in this stipulation will limit the evidence admitted at trial of acts and/or omissions of TRENT HANSEN. Nor will this stipulation, alone, limit the Plaintiffs' ability to recover against any other Defendants in this case in any way.

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8. That Defendant TRENT HANSEN may be dismissed, with prejudice, from the instant litigation in case 2:17-cv-02380, with each party to bear their own attorneys' fees and costs.

**IT IS SO ORDERED.**

DATED this 10th day of January, 2018.



UNITED STATE DISTRICT COURT JUDGE