

1 KAMER ZUCKER ABBOTT
 R. Todd Creer #10016
 2 Kaitlin H. Paxton #13625
 3000 West Charleston Boulevard, Suite 3
 3 Las Vegas, Nevada 89102-1990
 Tel: (702) 259-8640
 4 Fax: (702) 259-8646
 tcreer@kzalaw.com
 5 kpaxton@kzalaw.com

6 Attorneys for Defendant
 City of North Las Vegas
 7

8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9	PAMELA DITTMAR,)	Case No. 2:17-cv-02916-JAD-PAL
10)	
	Plaintiff,)	<u>STIPULATION AND ORDER TO</u>
11)	<u>STAY PROCEEDINGS PENDING</u>
	vs.)	<u>RESOLUTION OF THE PARTIES'</u>
12)	<u>MOTIONS REGARDING THE</u>
	CITY OF NORTH LAS VEGAS, a municipal)	<u>DEPOSITIONS OF MAYOR JOHN</u>
13	corporation,)	<u>LEE AND CITY MANAGER RYANN</u>
)	<u>JUDEN</u>
14	Defendant.)	(First Request)

15 Plaintiff Pamela Dittmar (“Plaintiff”), by and through her counsel, Melanie Hill Law PLLC,
 16 and Defendant City of North Las Vegas (“Defendant”), by and through its counsel, Kamer Zucker
 17 Abbott, stipulate and request that the Court stay these proceedings pending resolution of Plaintiff’s
 18 Motion to Compel Depositions of Mayor John Lee and Ryann Juden (ECF No. 38) and Defendant’s
 19 Motion for Protective Order as to the Requested Depositions of Mayor John Lee and City Manager
 20 Ryann Juden (ECF No. 36). In support of this Stipulation and Request, the parties state as follows:

21 1. On March 12, 2019, the parties stipulated to a briefing schedule for the motions
 22 regarding the depositions of Mayor John Lee (“Lee”) and City Manager Ryann Juden (“Juden”), which
 23 was approved by the Honorable Magistrate Judge Peggy A. Lee on March 14, 2019 (ECF No. 33).
 24

1 2. Defendant filed its opening brief on March 22, 2019 and Plaintiff filed her opening
2 brief on March 23, 2019.

3 3. Both parties filed their response briefs on March 30, 2019 (ECF Nos. 41 and 42).

4 4. A hearing has thus far not been ordered on this dispute nor has a decision been issued.

5 5. As acknowledged in the stipulation, the parties agreed to not hold the Lee and Juden
6 depositions until after a decision has been rendered. Likewise, other discovery dependent on the
7 outcome of whether the depositions will take place has also been paused.

8 6. The parties have extended discovery twice. Rather than ask for additional extensions
9 without knowing when the motions will be decided and in an effort to conserve expenditures and
10 resources, the parties seek to stay all proceedings until the motions are decided.

11 7. Once the Court has ruled on the motions, the parties will work cooperatively together
12 to submit appropriate deadlines to complete discovery and continue to move this case forward.

13 8. This request to stay proceedings is not sought for any improper purpose or other
14 reason of delay. Rather, it is sought only to conserve the parties' respective resources and efficiently
15 conduct discovery while awaiting the Court's decision on the motions regarding the Lee and Juden
16 depositions.

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

1 WHEREFORE, the parties respectfully request that the Court stay proceedings in this case
2 until the resolution of Plaintiff's Motion to Compel Depositions of Mayor John Lee and Ryann Juden
3 and Defendant's Motion for Protective Order as to the Requested Depositions of Mayor John Lee
4 and City Manager Ryann Juden.

5 DATED this 26th day of April, 2019.

6 Respectfully submitted,

Respectfully submitted,

7 MELANIE HILL LAW PLLC

KAMER ZUCKER ABBOTT

8 /s/ Melanie A. Hill

/s/ Kaitlin H. Paxton

9 Melanie A. Hill #8796
10 520 S. 7th Street, Suite A
11 Las Vegas, Nevada 89101
12 Tel: (702) 362-8500
13 Fax: (702) 362-8505

R. Todd Creer #10016
Kaitlin H. Paxton #13625
3000 West Charleston Boulevard, Suite 3
Las Vegas, Nevada 89102
Tel: (702) 259-8640
Fax: (702) 259-8646

14 Attorney for Plaintiff
15 Pamela Dittmar

Attorneys for Defendant
City of North Las Vegas

16 **IT IS SO ORDERED.**

17 May 2, 2019

18 _____
19 DATE

20 
21 _____
22 UNITED STATES MAGISTRATE JUDGE