MARK E. FERRARIO 1 Nevada Bar No. 1625 2 KARA B. HENDRICKS Nevada Bar No. 7743 WHITNEY L. WELCH-KIRMSE Nevada Bar No. 12129 GREENBERG TRAURIG, LLP 10845 Griffith Peak Drive, Ste. 600 Las Vegas, NV 89135 Tel: (702) 792-3773 (702) 792-9002 6 Fax: Email: ferrariom@gtlaw.com hendricksk@gtlaw.com 7 welchkirmsew@gtlaw.com 8 Attorneys for Defendants Clark County School District and Mark Connors 9 UNITED STATES DISTRICT COURT 10 DISTRICT OF NEVADA 11 12 TAMMARA TIMS and H.H., a minor by and through his Guardian Ad Litem, GENEVA 13 ATTEBERRY,

CASE NO. 2:18-cv-00021-JAD-VCF

Plaintiffs,

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CLARK COUNTY SCHOOL DISTRICT; KASEY GLASS, MARK CONNORS, and DOES 1-50.

Defendants.

STIPULATION AND REQUEST TO STAY LITIGATION PENDING SATISFACTION OF SETTLEMENT TERMS AND EXECUTION OF SETTLEMENT AGREEMENT

ECF No. 244

Plaintiff H.H., a Minor, by and through his Guardian Ad Litem, Geneva Atteberry ("Plaintiff"), by and through his counsel of record, and Defendants Clark County School District, Kasey Glass, and Mark Connors (collectively "Defendants"), by and through their counsel of record, hereby request that the Court stay this matter while the parties work on satisfying agreed-upon settlement terms reached at mediation. The parties state as follows:

- On December 11, 2019, the parties attended a mediation session, which resulted in a 1. preliminary agreement of settlement terms.
- 2. A stay in this matter will allow the parties the opportunity to satisfy preliminary terms of the settlement, including finalizing the settlement agreement, seeking approval from CCSD's Board of

| 1                                  | Trustees regarding settlement terms, and seeking Court approval regarding the Minor's Compromise                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| 2                                  | prior to dismissing this matter.                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| 3                                  | 3. The parties stipulate that this case be                                                                                                                                                                                                                                                                                                                                                                                                            | stayed and that the deadline for any action required                                                                                                                                                                                                                                                                                                                                                                                                                                       |  |
| 4                                  | to be taken by any party be tolled until further order                                                                                                                                                                                                                                                                                                                                                                                                | of the court.                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  |
| 5                                  | 4. The parties request that a status check                                                                                                                                                                                                                                                                                                                                                                                                            | k be set for 90 days.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |
| 6                                  | 5. This stipulation is made in good fair                                                                                                                                                                                                                                                                                                                                                                                                              | th to allow the parties to make diligent and sincere                                                                                                                                                                                                                                                                                                                                                                                                                                       |  |
| 7                                  | efforts to resolve the matter without further involv                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| 8                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| 9                                  | IT IS SO STIPULATED.                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
|                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                       | DATED 4: 12th 1 CD 1 2010                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |
| 10                                 | DATED this 13 <sup>th</sup> day of December, 2019.                                                                                                                                                                                                                                                                                                                                                                                                    | DATED this 13 <sup>th</sup> day of December, 2019.                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |
| 11<br>12                           | GREENBERG TRAURIG, LLP                                                                                                                                                                                                                                                                                                                                                                                                                                | LAW OFFICES OF PETER ALFERT, PC                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| 16<br>17<br>18<br>19<br>220<br>221 | /s/ Kara B. Hendricks  MARK E. FERRARIO, ESQ. Nevada Bar No. 1625 KARA B. HENDRICKS, ESQ. Nevada Bar No. 7743 WHITNEY L. WELCH-KIRMSE, ESQ. Nevada Bar No. 12129 10845 Griffith Peak Drive, Suite 600 Las Vegas, NV 89135 Counsel for Defendants Clark County School District and Mark Connors  DATED this 13 <sup>th</sup> day of December, 2019.  GORDON REES SCULLY MANSUKHANI, LLP  /s/ David T. Gluth ROBERT S. LARSEN, ESQ. Nevada Bar No. 7785 | /s/ Peter W. Alfert PETER W. ALFERT, ESQ. (Pro Hac Vice) California Bar No. 83139 IAN HANSEN, ESQ. (Pro Hac Vice) California Bar No. 255449 909 Mariner Village Parkway, Suite 199 Alameda, CA 94501  MICHAEL A. BURKE, ESQ. Nevada Bar No. 11527 ROBISON SHARP SULLIVAN & BRUST 71 Washington Street Reno, NV 89503  TODD A. BOLEY, ESQ. (Pro Hac Vice) California Bar No. 68119 LAW OFFICES OF TODD BOLEY 2381 Mariner Square Drive, Suite 280 Alameda, CA 94501 Attorneys for Plaintiff |  |
| 23<br>24                           | DAVID T. GLUTH, ESQ.<br>Nevada Bar No. 10596                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| 25                                 | 300 S. 4 <sup>th</sup> Street, Suite 1550<br>Las Vegas, NV 89101                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| 26                                 | Attorneys for Kasey Glass                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |
| 27                                 | ORI                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <u>DER</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |

In consideration of the stipulation by the parties, [ECF No. 244], and with good cause appearing,

| 1       | IT IS HEREBY ORDERED that this case is STAYED; and that all deadlines for any action   |  |
|---------|----------------------------------------------------------------------------------------|--|
| 2       | required to be taken by any party be tolled until further order by the Court.          |  |
| 3       | IT IS FURTHER ORDERED that any hearing currently set is VACATED;                       |  |
| 4       | IT IS FURTHER ORDERED that a status check in this matter will occur on the 11th day of |  |
| 5       | March , 2020 at 4:00 p.m.                                                              |  |
| 6       | IT IS SO ORDERED.                                                                      |  |
| 7       | DATED this 13th day of December, 2019.                                                 |  |
| 8       |                                                                                        |  |
| 9<br>10 | UNITED STATES DISTRICT COURT JUDGE                                                     |  |
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