

1 MICHAEL A. BURKE, Esq., NV Bar No. 11527
2 **ROBISON, SHARP, SULLIVAN & BRUST**

3 71 Washington Street
4 Reno, NV 89503
5 Telephone: (775) 329-3151
6 Facsimile: (775) 329-7941

7 TODD BOLEY, CA Bar No. 68119
8 **LAW OFFICES OF TODD BOLEY**

9 2831 Mariner Square Dr., Ste 280
10 Alameda, CA 94501
11 Telephone: (510) 836-4500
12 Facsimile: (510) 649-5170
13 (admitted Pro Hac Vice)

14 PETER W. ALFERT, CA Bar No. 83139
15 **LAW OFFICES OF PETER ALFERT, PC**

16 909 Marina Village Parkway #199
17 Telephone: (925) 279-3009
18 Facsimile: (925) 279-3342
19 (admitted Pro Hac Vice)
20 Attorneys for Plaintiffs

21 UNITED STATES DISTRICT COURT
22 DISTRICT OF NEVADA

23 TAMMARA TIMS and H.H., a minor by and
24 through his Guardian Ad Litem, GENEVA
25 ATTEBERRY

26 Plaintiffs,

27 v.

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

Defendants.

Case No. 2:18-cv-00021-JAD-VCF

**STIPULATION AND ORDER FOR CCSD
TO IDENTIFY NAME AND MOST
CURRENT CONTACT INFORMATION
OF PARENTS AND PRODUCE VIDEO
AND DOCUMENTS, IF ANY,
PURSUANT TO FAMILY EDUCATION
RIGHTS AND PRIVACY ACT
("FERPA"), 20 U.S.C. §1232G**

1 **IT IS HEREBY STIPULATED AND AGREED** by and between undersigned counsel
2 for Plaintiffs and undersigned counsel for Clark County School District (hereinafter “CCSD”)
3 that CCSD shall produce the name of the minor student and the names and most current contact
4 information of the parents/guardians of the CCSD student who was identified by Kelsey Wilhere
5 Lynch during her deposition on September 21, 2018 as having an inappropriate interaction with
6 KASEY GLASS in the Multipurpose Room on a date prior to March 15, 2017. CCSD shall also
7 produce video surveillance footage and writings concerning this interaction, if any exist.

8 **IT IS FURTHER HEREBY STIPULATED AND AGREED** that the disclosure of
9 such information will be subject to the Stipulated Confidentiality Agreement and Protective
10 Order entered on May 1, 2018, as the identities of the student and the student’s parents who are
11 not a party to this case may be protected by the Family Education Rights and Privacy Act
12 (“FERPA”), 20 U.S.C. §1232g.

13 **IT IS FURTHER HEREBY STIPULATED AND AGREED** that CCSD shall have 10
14 days from the date of this order to produce the above information, to allow CCSD sufficient time
15 to provide notice to the affected individuals and an opportunity to object to the disclosure of their
16 personal identifiable information.

17 **IT IS FURTHER HEREBY STIPULATED AND AGREED** that if any individual
18 objects to the disclosure of their personal information, that individual must file an appropriate
19 document with the court within 7 days of receipt of notice of this Order. The Court will then
20 make a determination regarding the validity of the objection and whether such information will
21 be disclosed at its earliest convenience.

22 **IT IS SO STIPULATED.**

23 Dated: October 18, 2018

ROBISON, SHARP, SULLIVAN & BRUST

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25 By: /s/ Michael A. Burke
26 MICHAEL A. BURKE
27 Attorney for Plaintiffs
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