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1 DAYLE ELIESON United States Attorney 2 District of Nevada 3 KRYSTAL J. ROSSE Assistant United States Attorney 4 Nevada Bar No. 11573 501 Las Vegas Boulevard South, Suite 1100 Las Vegas, Nevada 89101 Telephone: 702-388-6336 5 Email: krystal.rosse@usdoj.gov 6 7 Attorneys for the United States. 8 9 10 UNITED STATES DISTRICT COURT 11 **DISTRICT OF NEVADA** 12 THOMAS DORSEY, Case No. 2:18-cv-00209-APG-NJK 13 Plaintiff, 14 v. UNOPPOSED MOTION TO STAY 15 MARK T. ESPER, in his capacity as the PROCEEDINGS PENDING United States Secretary of the Army, COMPROMISE SETTLEMENT 16 Defendant. 17 18 Federal Defendant Mark T. Esper, in his official capacity as the United States Secretary of the Army, respectfully requests this Court enter a stay of all proceedings and deadlines, 19 20 including all motion and discovery deadlines, until October 12, 2018, in order to allow the 21 parties to finalize the terms of a settlement agreement and to execute and enter a Stipulation to 22 Dismiss with Prejudice. Plaintiff does not oppose this request. 23 In support of this motion, Federal Defendant submits as follows: 24 1. Over the past several weeks the parties have been engaged in settlement 25 negotiations and have recently agreed in principal to a compromise settlement which will resolve 26 all outstanding claims between the parties. Documents supporting this settlement are being 27 prepared and the parties expect that the matter will be concluded within the next month.

1	2. Courts have broad discretion to stay proceedings for a limited time. See Landis v.
2	N. Am. Co., 299 U.S. 248, 254-55 (1936); see also Clinton v. Jones, 520 U.S. 681, 706 (1997)
3	(courts have broad discretion in the management of cases, including the setting of cases for trial)
4	3. The instant motion is filed in good faith and not for the purposes of delay.
5	4. If the matter is not concluded by October 12, 2018, the parties will file a status
6	report advising of reasons that it is not concluded.
7	For the above reasons, Federal Defendant respectfully requests this Court stay the
8	proceedings and deadlines in this matter until October 12, 2018.
9	Respectfully submitted this 11th day of September 2018.
10	DAYLE ELIESON United States Attorney
11	/s/ Krystal J. Rosse
12	KRYSTAL J. ROSSE Assistant United States Attorney
13	Assistant Office States Actorney
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15	IT IS SO ORDERED:
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17	UNITED STATES DISTRICT JUDGE
18	Dated: September 11, 2018.
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21	PROOF OF SERVICE
22	I, Krystal J. Rosse, certify that the UNOPPOSED MOTION TO STAY
23	PROCEEDINGS PENDING COMPROMISE SETTLEMENT was served this date on all
24	parties via the Court's Electronic Case Filing system.
25 26	Dated this 11th day of September 2018.
20 27	/s/ Krystal J. Rosse KRYSTAL J. ROSSE
$\begin{bmatrix} 27 \\ 28 \end{bmatrix}$	Assistant United States Attorney