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8 *Attorneys for Defendants*
Scherrie Bean and Brian Williams

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 12 UNITED STATES DISTRICT COURT
 13 DISTRICT OF NEVADA

14 SHANNON CARTER,
 15 Plaintiff,

16 v.

17 JAMES DZURENDA, *et al.*,
 18 Defendants.

Case No. 2:18-cv-00452-APG-BNW

**STIPULATION AND ORDER FOR
 DISMISSAL WITH PREJUDICE**

19 IT IS HEREBY STIPULATED by and between Shannon Carter, in proper person,
 20 and Defendants, Scherrie Bean and Brian Williams, by and through counsel, Aaron D.
 21 Ford, Nevada Attorney General, and Austin T. Barnum, Deputy Attorney General, of the
 22 State of Nevada, Office of the Attorney General, that:

- 23 1. The above-captioned action be dismissed, with prejudice, by order of this Court, with
 24 each party to bear his own costs.
 25 2. Defendants preserve the right to seek a strike pursuant to the Prison Litigation
 26 Reform Act, 28 U.S.C. § 1915(g).

27 This stipulation for Dismissal with Prejudice and Defendants' preservation of the
 28 right to seek a strike pursuant to 18 U.S.C. §1915(g) is according to the terms agreed upon

1 at negotiations on May 6, 2020, at approximately 10:00 a.m. This negotiation is
2 memorialized in the Declaration of Counsel, Deputy Attorney General Austin T. Barnum,
3 attached as "Exhibit A."

4 DATED this 7th day of May, 2020. DATED this 7th day of May, 2020

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6 AARON D. FORD
Attorney General

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9 SHANNON CARTER, #70773
Plaintiff, *Pro Se*

By: 

AUSTIN T. BARNUM, Bar No. 15174
Deputy Attorney General
Attorneys for Defendants

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12 IT IS SO ORDERED.

13 
14 UNITED STATES DISTRICT JUDGE

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16 DATED: 5/7/2020

EXHIBIT A

Declaration of Counsel

EXHIBIT A

1 AARON D. FORD
Attorney General
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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

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17 JAMES DZURENDA, *et al.*,
18 Defendants.

Case No. 2:18-cv-00452-APG-BNW

DECLARATION OF COUNSEL

19 I, Austin T. Barnum, Esq., declare in support of this Stipulation and Order to
20 Dismiss with Prejudice, in the matter styled *Shannon Carter v. James Dzurenda, et. al.*,
21 Case No. 2:180cv-00452-APG-BNW in the Federal District of Nevada:

22 1. I am an attorney duly licensed to practice before all Courts in the State of
23 Nevada, and am a Deputy Attorney General in the employment of the Office of the Attorney
24 General.

25 2. I am responsible Counsel for the Defendants in the instant matter.

26 3. On May 6, 2020, I called Plaintiff, Shannon Carter (Carter), consistent with a
27 scheduled meeting with Warm Springs Correctional Center.

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