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15 *Attorneys for Defendants Clark County School District,
16 Stephanie Garni, Kathy Konowalow, Pat Skorkowsky, and
17 Vail Pittman Elementary School*

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

1 HATTIE BLUE, individual and natural parent and
2 SUSAN HOY as Guardian Ad Litem for J.B., a
3 minor,

4 Plaintiffs,

5 v.

6 PAMELA SMITH, in her official capacity;
7 STEPHANIE GARNI, in her officer capacity;
8 KATHY KONOWALOW, in her official capacity;
9 PAT SKORKOWSKY, in his official capacity;
10 VAIL PITTMAN ELEMENTARY SCHOOL;
11 CLARK COUNTY SCHOOL DISTRICT, a
12 Political Subdivision of the State of Nevada;
13 PROGRESSUS THERAPY, LLC, a Foreign
14 Limited-Liability Company; INVO HOLDINGS,
15 LLC, a domestic Limited-Liability Company;
16 PROGRESSUS, INC, a Florida Corporation;
17 DOES I through X, inclusive; and ROES I through
18 X, inclusive,

19 Defendants.

20 CASE NO. 2:20-CV-00401-GMN-NJK

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

1 By and among counsel for Plaintiffs Hattie Blue and Susan Hoy, Guardian Ad Litem for J.B.,
2 a minor, counsel for Defendants Clark County School District (“CCSD”), Stephanie Garni, Kathy
3 Konowalow, Pat Skorkowsky, and Vail Pittman Elementary School, counsel for Defendants Invo
4 Holdings, LLC and Progressus Therapy, LLC, and counsel for Defendant Pamela Smith,
5 (collectively the “Parties”) hereby request that the Court stay this matter while the Parties work on
6 satisfying agreed-upon settlement terms. The Parties state as follows:

7 1. On October 16, 2020, the Parties reached a preliminary agreement of settlement
8 terms.

9 2. A stay in this matter will allow the Parties the opportunity to satisfy preliminary terms
10 of the settlement, including finalizing the settlement agreement, and seeking Court approval
11 regarding the Minor’s Compromise, prior to dismissing this matter.

12 3. The Parties stipulate that this case be stayed and that the deadline for any action
13 required to be taken by any party be tolled until further order of the court.

14 4. The Parties request that a status check be set for ninety (90) days.

15 5. This stipulation is made in good faith to allow the Parties to make diligent and sincere
16 efforts to resolve the matter without further involvement for the Court and is not for the purpose of
17 causing any undue delay.

18 **IT IS SO STIPULATED.**

19 DATED this 17th day of November, 2020.

20 **GREENBERG TRAURIG, LLP**

DATED this 17th day of November, 2020.

H&P LAW

22 /s/ Whitney L. Welch-Kirmse
23 MARK F. FERRARIO
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/s/ Marjorie L. Hauf
MARJORIE L. HAUF
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Attorneys for Plaintiff

27 *Attorneys for Clark County School District,
Stephanie Garni, Kathy Konowalow, Pat
Skorkowsky, and Vail Pittman Elementary School*

1 DATED this 17th day of November, 2020.

2 **WINSTON & STRAWN, LLP**

3

4 /s/ Zarouhi Papazyan
5 MONIQUE NGO-BONNICI (*Pro Hac Vice*)
Cal. Bar No. 241315
6 ZAROUHI PAPAZYAN (*Pro Hac Vice*)
Cal Bar No. 328645
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7 Los Angeles, CA 90071

8 *Attorneys for Defendants Invo Holdings, LLC and*
Progressus Therapy, LLC

1 DATED this 17th day of November, 2020.

2 **LIPSON NEILSON**

3

4 /s/ Julie Funai
5 JULIE FUNAI
Nevada Bar No. 8725
9 9900 Covington Cross, Suite 120
Las Vegas, NV 89144

10 *Attorneys for Defendant Pamela Smith*

11 **ORDER**

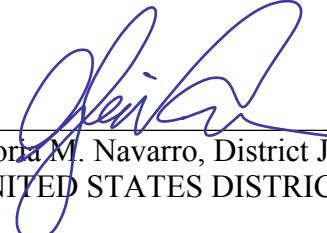
12 In consideration of the stipulation by the Parties, and with good cause appearing,

13 IT IS SO ORDERED.

14 DATED this 17 day of November, 2020.

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Gloria M. Navarro, District Judge
18 UNITED STATES DISTRICT COURT

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