

1 MARK E. FERRARIO
 Nevada Bar No. 1625
 2 KARA B. HENDRICKS
 Nevada Bar No. 7743
 3 WHITNEY L. WELCH-KIRMSE
 Nevada Bar No. 12129
 4 **GREENBERG TRAURIG, LLP**
 10845 Griffith Peak Drive, Ste. 600
 5 Las Vegas, NV 89135
 Tel: (702) 792-3773
 6 Fax: (702) 792-9002
 Email: ferrariom@gtlaw.com
 7 hendricksk@gtlaw.com
 8 welchkirmsew@gtlaw.com

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

11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

13 HATTIE BLUE, individual and natural parent and
 14 SUSAN HOY as Guardian Ad Litem for J.B., a
 minor,

15
 16 Plaintiffs,

17 v.

18 PAMELA SMITH, in her official capacity;
 STEPHANIE GARNI, in her officer capacity;
 19 KATHY KONOWALOW, in her official capacity;
 PAT SKORKOWSKY, in his official capacity;
 20 VAIL PITTMAN ELEMENTARY SCHOOL;
 21 CLARK COUNTY SCHOOL DISTRICT, a
 Political Subdivision of the State of Nevada;
 22 PROGRESSUS THERAPY, LLC, a Foreign
 Limited-Liability Company; INVO HOLDINGS,
 23 LLC, a domestic Limited-Liability Company;
 PROGRESSUS, INC, a Florida Corporation;
 24 DOES I through X, inclusive; and ROES I through
 25 X, inclusive,

26 Defendants.

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

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

27
 28 ///

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.

DATED this 17th day of November, 2020.

20 **GREENBERG TRAUIG, LLP**

H&P LAW

21
22 /s/ Whitney L. Welch-Kirmse
23 MARK F. FERRARIO
24 Nevada Bar No. 1625
25 KARA B. HENDRICKS
26 Nevada Bar No. 7743
27 WHITNEY L. WELCH-KIRMSE
28 Nevada Bar No. 12129
10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135

/s/ Marjorie L. Hauf
MARJORIE L. HAUF
Nevada Bar No. 8111
MATTHEW G. PFAU
Nevada Bar No. 11439
8950 West Tropicana Avenue, Suite 1
Las Vegas, NV 89147
Attorneys for Plaintiff

*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.

DATED this 17th day of November, 2020.

2 **WINSTON & STRAWN, LLP**

LIPSON NEILSON

3
4 /s/ Zarouhi Papazyan
MONIQUE NGO-BONNICI (*Pro Hac Vice*)
5 Cal. Bar No. 241315
ZAROUHI PAPAZYAN (*Pro Hac Vice*)
6 Cal Bar No. 328645
333 S. Grand Avenue, 38th Floor
7 Los Angeles, CA 90071

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

Attorneys for Defendant Pamela Smith

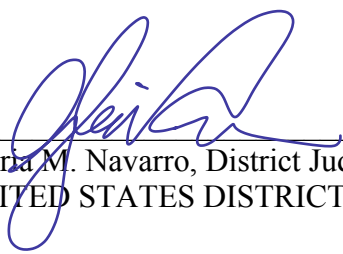
8 *Attorneys for Defendants Invo Holdings, LLC and*
9 *Progressus Therapy, LLC*

10
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.

15
16
17
18 
Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT