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Nevada Bar Number 13644

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Jennifer Bradford,

Plaintiff,

v.

United States of America,

Defendant.

Case No. 2:20-cv-00754-JAD-EJY
**Stipulation to Stay Proceedings Pending
Settlement Negotiations**

The parties, through their respective counsel, hereby stipulate to stay the proceedings in this matter.

Discovery is currently stayed (ECF No. 21) pending the Court’s ruling on Defendant’s Motion to Dismiss (ECF No. 13). The parties are in settlement negotiations and are optimistic that they can resolve this matter. The parties seek to avoid a ruling on the Motion to Dismiss while they explore potential settlement.

This is the parties’ first request to stay the proceedings in this matter, and the stipulation is not sought for purposes of delay. Rather, the parties request a stay to permit them to focus their time and resources on settlement discussions. After conferring, the parties believe a stay of 60 days, or until April 25, 2021, should be sufficient.

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1 WHEREFORE, the parties respectfully request that the Court enter an order
2 granting this stipulation and staying the proceedings until **April 25, 2021**, and that the
3 Court set a Status Conference, at a time and date convenient to the Court, shortly after
4 expiration of the stay.

5 Dated this 24th day of February 2021.

6 SIMON LAW

7 s/ Benjamin J. Miller

8 DANIEL S. SIMON, ESQ.
9 BENJAMIN J. MILLER, ESQ.
10 810 S. Casino Center Blvd.
11 Las Vegas, NV 89101

Attorneys for Plaintiff

NICHOLAS A. TRUTANICH
United States Attorney

12 s/ Brian W. Irvin

13 BRIAN W. IRVIN
14 Assistant United States Attorney

Attorneys for the United States

15 **IT IS SO ORDERED:**

16 
17 DAYNA J. ZOUCHAK
18 UNITED STATES MAGISTRATE JUDGE

19 **DATED:** February 24, 2021
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