

SAO

1 **WALEED ZAMAN, ESQ.**

Nevada State Bar No. 13993

2 **MICHAEL TRIPPIEDI, ESQ.**

Nevada State Bar No. 13973

3 **ZAMAN & TRIPPIEDI**

6620 S. Tenaya Way, Suite 100

4 Las Vegas, NV 89113

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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

* * *

9 LESLYE HINDS,

10 Plaintiff,

11 vs.

12 UNITED STATES OF AMERICA
13 DEPARTMENT OF THE INTERIOR; DOE
EMPLOYEE; DOES I through XX, inclusive;
14 and ROE CORPORATIONS I through XX,
inclusive,

15 Defendants.

Case No: 2:21-cv-622-GMN-VCF

**STIPULATION AND ORDER TO
AMEND PLAINTIFF'S COMPLAINT
AND TO WITHDRAW DEFENDANT'S
MOTION TO DISMISS**

17 COME NOW, Plaintiff, LESLYE HINDS, by and through her counsel of record, WALEED
18 ZAMAN, ESQ. and MICHAEL TRIPPIEDI, ESQ., of ZAMAN & TRIPPIEDI, PLLC., and
19 Defendant, UNITED STATES OF AMERICA (incorrectly captioned as "United States of America
20 Department of Interior") by and through its counsel of record CHRISTOPHER CHIOU, ESQ., and
21 HOLLY A. VANCE, ESQ., and do hereby agree and stipulate as follows:

22 **IT IS HEREBY STIPULATED AND AGREED** that Plaintiff shall file an Amended
23 Complaint listing the United States of America as the properly named Defendant in this matter,
24 replacing the current designation of United States of America Department of the Interior.

25 **IT IS FURTHER STIPULATED AND AGREED** that Plaintiff's Amended Complaint
26 will not contain a cause of action for Negligent Hiring, Training, and Supervision against the
27 Defendant.

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STIPULATION AND ORDER TO AMEND PLAINTIFF'S COMPLAINT AND TO WITHDRAW
DEFENDANT'S MOTION TO DISMISS



1 **IT IS FURTHER STIPULATED AND AGREED** that Plaintiff's Amended Complaint
 2 will not contain a request for a jury trial or requests for a separate award of attorneys' fees and costs
 3 or prejudgment interest.

4 **IT IS FURTHER STIPULATED AND AGREED** that Defendant's Motion to Dismiss
 5 Plaintiff's Complaint and Demand For Jury Trial (ECF Nos. 1, 5), filed on November 15, 2021, is
 6 hereby withdrawn as moot.

7 **IT IS FURTHER STIPULATED AND AGREED** that upon the filing of Plaintiff's
 8 Amended Complaint, Defendant shall accept service of same and agree that all formal requirements
 9 regarding service pursuant to Fed. R. Civ. P. 4(i)(1)(A)-(B) have been satisfied in this matter.

10 **IT IS SO STIPULATED.**

11 DATED this 17th day of November 2021.
 12 **ZAMAN & TRIPPIEDI, PLLC**

13
 14
 15 /s/ Michael Trippiedi
 16 WALEED ZAMAN, ESQ.
 Nevada State Bar No. 13993
 17 MICHAEL TRIPPIEDI, ESQ.
 Nevada State Bar No. 13973
 6620 S. Tenaya Way, Suite 100
 18 Las Vegas, NV 89113
 19 *Attorneys for Plaintiff*

DATED this 17th day of November 2021.
UNITED STATES ATTORNEY

15 /s/ Holly Vance
 CHRISTOPHER CHIOU, ESQ.
 Nevada State Bar No. 14853
 16 HOLLY A. VANCE, ESQ.
 400 S. Virginia Street, Suite 900
 Reno, Nevada 89501
 17 *Attorneys for Defendant*



ORDER

IT IS HEREBY ORDERED that the terms and conditions of the above Stipulation and Order are adopted and ratified by the Court, and the same is entered as the Order of this Court.

DATED this 18th day of November, 2021.



Cam Ferenbach
United States Magistrate Judge

Respectfully Submitted By:

Approved As To Form And Content:

/s/ Michael Trippiedi
WALEED ZAMAN, ESQ.
Nevada State Bar No. 13993
MICHAEL TRIPPIEDI, ESQ.
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/s/ Holly Vance
CHRISTOPHER CHIOU, ESQ.
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Yanni Sitsis <yanni@ztlawgroup.com>

Fwd: [EXTERNAL] Leslye Hinds (2:21-cv-00622-GMN-VCF) - SAO and Amended Complaint

1 message

Michael Stannard <stannard@ztlawgroup.com>
To: Yanni Sitsis <yanni@ztlawgroup.com>

Wed, Nov 17, 2021 at 9:53 AM

----- Forwarded message -----

From: **Vance, Holly A. (USANV)** <Holly.A.Vance@usdoj.gov>
Date: Wed, Nov 17, 2021 at 7:45 AM
Subject: RE: [EXTERNAL] Leslye Hinds (2:21-cv-00622-GMN-VCF) - SAO and Amended Complaint
To: Michael Stannard <stannard@ztlawgroup.com>
Cc: Michael Trippiedi <mike@ztlawgroup.com>

Good morning Michael,

Thank you for drafting the stipulation and amended complaint. Attached are my proposed revisions to your stipulation. If you agree, you may affix my electronic signature to the stipulation and file.

I will review the amended complaint this afternoon and get back to you on that as soon as I can. Thanks again.

Best regards,

Holly

Holly A. Vance

Assistant United States Attorney

Bruce R. Thompson Federal Building and U.S. Courthouse

District of Nevada

400 South Virginia Street, Suite 900

Reno, Nevada 89501

Phone: 775-784-5438

Email: holly.a.vance@usdoj.gov

From: Michael Stannard <stannard@ztlawgroup.com>
Sent: Tuesday, November 16, 2021 1:03 PM
To: Vance, Holly A. (USANV) <HVance@usa.doj.gov>
Cc: Michael Trippiedi <mike@ztlawgroup.com>
Subject: [EXTERNAL] Leslye Hinds (2:21-cv-00622-GMN-VCF) - SAO and Amended Complaint

Ms. Vance,

Attached for your review is our proposed SAO and Amended Complaint. If you would like to add a stipulation regarding an extension of time to file an Answer, that is no problem, just indicate how long of an extension you may require and I will happily include that provision.

If you have any questions or concerns please do not hesitate to contact us.

Thanks again.

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Michael Stannard, Esq.
Associate Attorney

P: 702-359-0157

F: 702-920-8837

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