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 Nevada Bar No. 6296  
 2 NAKESHA S. DUNCAN-PEREZ, ESQ.  
 Nevada Bar No. 11556  
 3 CHAD D. FUSS, ESQ.  
 Nevada Bar No. 12744  
 4 **SPRINGEL & FINK LLP**  
 5 9075 W. Diablo Drive, Suite 302  
 6 Las Vegas, Nevada 89148  
 Telephone: (702) 804-0706  
 7 E-Mail: *lfink@springelfink.com*  
*nduncan@springelfink.com*  
 8 *cfuss@springelfink.com*

9 Attorneys for Defendant,  
 10 *SECURITAS SECURITY SERVICES USA, INC.*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 \*\*\*

14  
 15 JASON LOWE,

16 Plaintiff,

17 vs.

18  
 19 WALMART, INC. DBA WALMART  
 20 NEIGHBORHOOD MARKET #4339 a Nevada  
 Domestic Limited Liability Company;  
 21 SECURITAS SECURITY SERVICES USA, INC.,  
 a Foreign Corporation; DOES 1 through 30; ROE  
 22 BUSINESS ENTITIES 1 through 30; DOE STAFF  
 23 MEMBERS 1 through 30, inclusive,

24 Defendants.  
 25

Case No.: 2:21-cv-02192-JCM-DJA

**STIPULATION AND ORDER TO DISMISS  
 PLAINTIFF'S COMPLAINT WITH  
 PREJUDICE**

26 Defendant, SECURITAS SECURITY SERVICES USA, INC.'S ("SECURITAS"), Defendant,  
 27 WALMART, INC. dba WALMART NEIGHBORHOOD MARKET #4339, and Plaintiff, JASON LOWE  
 28 ("Plaintiff") by and through their respective counsels of record, stipulate that:

1. Plaintiff's Complaint against Defendants, and all amendments thereto, are dismissed with prejudice; and
2. Each party is to bear its own attorneys' fees and costs.

IT IS SO STIPULATED.

DATED this 23rd day of March, 2023.

DATED this 23rd day of March, 2023.

SPRINGEL & FINK LLP

RICHARD HARRIS LAW FIRM

*/s/ Chad D. Fuss, Esq.*

*/s/ Ian C. Estrada, Esq.*

By: \_\_\_\_\_

By: \_\_\_\_\_

LEONARD T. FINK, ESQ.  
 Nevada Bar No. 6296  
 NAKESHA S. DUNCAN-PEREZ, ESQ.  
 Nevada Bar No. 11556  
 CHAD D. FUSS, ESQ.  
 Nevada Bar No. 12744  
 Attorneys for Defendant,  
*SECURITAS SECURITY SERVICES USA, INC.*

IAN C. ESTRADA, ESQ.  
 Nevada Bar No. 12575  
 801 S. Fourth St.  
 Las Vegas, NV 89101  
 Attorneys for Plaintiff,  
*JASON LOWE*

DATED this 23rd day of March, 2023.

ALVERSON TAYLOR & SANDERS

*/s/ Kurt Bonds, Esq.*

By: \_\_\_\_\_

KURT BONDS, ESQ.  
 Nevada Bar No. 6228  
 6605 Grand Montecito Pkwy., Ste. 200  
 Las Vegas, NV 89149  
 Attorney for Defendant,  
*WALMART, INC.*

**ORDERED**

IT IS HEREBY ORDERED.

DATED April 3, 2023.

  
 \_\_\_\_\_  
 UNITED STATES DISTRICT JUDGE

**From:** [Ian Estrada](#)  
**To:** [Chad D. Fuss](#); [Madison Aguirre](#); [Nakesha Duncan-Perez](#); [Karina Rosas](#)  
**Cc:** [Alma Duarte](#)  
**Subject:** Re: Lowe v. Walmart/Securitas  
**Date:** Wednesday, March 22, 2023 12:20:40 PM

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Chad, please go ahead and use my e-signature.

And thanks for putting this together. (I know I said I'd do it; so, thank you)

Thanks,

Ian

---

**From:** Chad D. Fuss <[cfuss@springelfink.com](mailto:cfuss@springelfink.com)>  
**Date:** Wednesday, March 22, 2023 at 12:16 PM  
**To:** [Madison Aguirre](mailto:MAguirre@AlversonTaylor.com) <[MAguirre@AlversonTaylor.com](mailto:MAguirre@AlversonTaylor.com)>, [Ian Estrada](mailto:Ian Estrada) <[Ian Estrada](mailto:Ian Estrada)>, [Nakesha Duncan-Perez](mailto:Nakesha Duncan-Perez) <[Nakesha Duncan-Perez](mailto:Nakesha Duncan-Perez)>, [Karina Rosas](mailto:Karina Rosas) <[Karina Rosas](mailto:Karina Rosas)>  
**Cc:** [Alma Duarte](mailto:Alma Duarte) <[Alma Duarte](mailto:Alma Duarte)>  
**Subject:** RE: Lowe v. Walmart/Securitas

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ian and Madison-

Attached is a draft stipulation to dismiss. Please let us know if we can use your electronic signatures on it.

Thank you.

Chad D. Fuss  
Attorney



9075 W. Diablo Drive., Suite 302 | Las Vegas, NV 89148  
Tel: [\(702\) 804-0706](tel:(702)804-0706) | Fax: [\(702\) 804-0798](tel:(702)804-0798)

---

**From:** [Madison Aguirre](mailto:MAguirre@AlversonTaylor.com) <[MAguirre@AlversonTaylor.com](mailto:MAguirre@AlversonTaylor.com)>  
**Sent:** Thursday, March 16, 2023 8:40 AM  
**To:** 'Ian Estrada' <[Ian Estrada](mailto:Ian Estrada)>; [Chad D. Fuss](mailto:Chad D. Fuss) <[Chad D. Fuss](mailto:Chad D. Fuss)>; [Nakesha](mailto:Nakesha)

Duncan-Perez <nduncan@springelfink.com>; Karina Rosas <krosas@richardharrislaw.com>

**Subject:** RE: Lowe v. Walmart/Securitas

Good morning,

That is accurate.

Thank you.

**Madison Aguirre** |  
Alverson Taylor & Sanders  
702.384.7000 | [alversontaylor.com](http://alversontaylor.com)

---

**From:** Ian Estrada <[ian@richardharrislaw.com](mailto:ian@richardharrislaw.com)>

**Sent:** Wednesday, March 15, 2023 7:06 PM

**To:** Chad D. Fuss <[cfuss@springelfink.com](mailto:cfuss@springelfink.com)>; Nakesha Duncan-Perez <nduncan@springelfink.com>;  
Madison Aguirre <[MAguirre@AlversonTaylor.com](mailto:MAguirre@AlversonTaylor.com)>; Karina Rosas <[krosas@richardharrislaw.com](mailto:krosas@richardharrislaw.com)>

**Subject:** Lowe v. Walmart/Securitas

Chad and Madison,

This is to confirm that both of your clients have agreed to a walk away. Mr. Lowe will dismiss your clients with prejudice and each party will cover their own fees and costs.

If this is not accurate, please let me know.

I will circulate a SAO to Dismiss shortly.

Thanks,

Ian

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**From:** [Kurt Bonds](#)  
**To:** [Chad D. Fuss](#); [Madison Aguirre](#); "Ian Estrada"; [Nakesha Duncan-Perez](#); [Karina Rosas](#)  
**Cc:** [Alma Duarte](#)  
**Subject:** RE: Lowe v. Walmart/Securitas  
**Date:** Wednesday, March 22, 2023 12:31:21 PM  
**Attachments:** [image002.png](#)

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This works for us on behalf of Walmart. Kurt.

## Kurt Bonds, Esq.



6605 Grand Montecito Pkwy., Suite 200, Las Vegas, NV 89149  
702.384.7000 Office | 702.385.7000 Fax

[website](#) | [bio](#) | [vCard](#) | [map](#) | [email](#)

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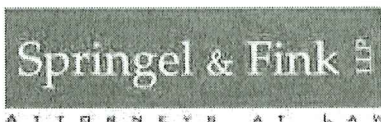
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**Cc:** Alma Duarte <[aduarte@springelfink.com](mailto:aduarte@springelfink.com)>  
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Attorney



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Duncan-Perez <[nduncan@springelfink.com](mailto:nduncan@springelfink.com)>; Karina Rosas <[krosas@richardharrislaw.com](mailto:krosas@richardharrislaw.com)>

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