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8  
9 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

10 Lelend Naehu; and K.N., a minor, by and  
11 through her Guardian Ashlee Naehu,

12 Plaintiffs,

13 v.

14 Jamar Lakeith Glasper, an individual;  
United States of America, through the  
15 United States Postal Service, an agency of  
the Government of the United States of  
16 America, DOES 1 through 10, inclusive; and  
ROE Business Entities 1 through 10  
17 inclusive,

18 Defendants.

Case No. 2:24-cv-01705-CDS-BNW

**Stipulation to Stay Discovery**

19 Plaintiffs, Ashlee Naehu, and K.N., a minor, through counsel, and the United  
20 States of America on behalf of Federal Defendants, through their undersigned counsel,  
21 hereby stipulate and agree as follows:

22 1. Plaintiff filed the Complaint on September 12, 2024 (ECF No. 1-1).

23 2. Federal Defendants filed their Motion to Dismiss Plaintiffs' Complaint on  
24 January 3, 2025, arguing that Plaintiffs' claims are time barred by the Federal Tort Claims  
25 Act's two-year statute of limitations (ECF No. 17)

26 3. Although Federal Defendants filed a Motion to Stay Discovery pending the  
27 outcome of their Motion to Dismiss (ECF No. 32), the Court has issued a minute order  
28

1 that the parties' Discovery Plan and Scheduling Order is due March 10, 2025 (ECF No.  
2 31).

3 4. Because neither the Motion to Dismiss or Motion to Stay Discovery will be  
4 decided by March 10, 2025, the parties respectfully request that the Court stay discovery in  
5 this matter pending its ruling on Federal Defendants' Motion to Dismiss and vacate the  
6 pending March 10, 2025, Discovery Plan and Scheduling Order due date.

7 Therefore, the parties request that the Court stay discovery in this matter pending its  
8 ruling on Federal Defendants' Motion to Dismiss as well as vacate the upcoming due date  
9 of March 10, 2025, for the parties' Discovery Plan and Scheduling Order.

10 This stipulated request is filed in good faith and not for the purpose of undue delay.

11 Respectfully submitted this 7th day of March 2025.

12 SUE FAHAMI  
13 Acting United States Attorney

14 /s/ Ralph A. Schwartz  
15 RALPH A. SCHWARTZ, ESQ.  
16 400 South Seventh Street, Suite 100  
17 Las Vegas, Nevada 89101

18 *Attorney for Plaintiff*

19 /s/ Karissa D. Neff  
20 KARISSA D. NEFF  
21 Assistant United States Attorney  
22 *Attorneys for the United States*

23 **IT IS SO ORDERED:**

24   
25 **UNITED STATES MAGISTRATE JUDGE**

26 **DATED:** 3/10/2025

27 **IT IS FURTHER ORDERED** that the parties must file a Discovery Plan and  
28 Scheduling Order within 14 days of the Court's decision on the Motion to Dismiss.

**IT IS FURTHER ORDERED** that Defendants' Motion to Stay Discovery (ECF  
No. 32) is **DENIED as moot**.