

CLARK COUNTY SCHOOL DISTRICT  
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Steven Jackson, Kimberly Perry-Carter, and  
Clark County School District Police Department*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

O.T., a Minor, by her Father and Legal  
Guardian, OTIS LEE TANNER; OTIS LEE  
TANNER, an Individual,

Plaintiffs,

vs.

CLARK COUNTY SCHOOL DISTRICT;  
STEVEN JACKSON, an Individual;  
KIMBERLY PERRY-CARTER, Valley  
High School Principal; CLARK COUNTY  
SCHOOL DISTRICT POLICE  
DEPARTMENT, DOES I through XX; and  
ROE BUSINESS ENTITIES I through XX,  
inclusive,

Defendants.

Case No.: 2:24-cv-01841-JAD-NJK

**STIPULATION AND ORDER TO  
STAY CASE**

**[SECOND REQUEST]**

ECF No. 24

Defendants CLARK COUNTY SCHOOL DISTRICT, STEVEN JACKSON,  
KIMBERLY PERRY-CARTER, AND CLARK COUNTY SCHOOL DISTRICT POLICE  
DEPARTMENT (collectively "CCSD Defendants"), and Plaintiffs O.T., a minor by her father

1 and legal guardian OTIS LEE TANNER and OTIS LEE TANNER, an individual (collectively  
2 “Plaintiffs”) by and through their respective counsel of record, hereby stipulate to the following:

- 3 1. On August 16, 2024, Plaintiffs O.T., a minor by her father and legal guardian OTIS LEE  
4 TANNER and OTIS LEE TANNER, an individual (collectively “Plaintiffs”) filed a civil  
5 action in the Eighth Judicial District Court (A-24-899923-C) against Defendants CLARK  
6 COUNTY SCHOOL DISTRICT, STEVEN JACKSON, KIMBERLY PERRY-CARTER,  
7 AND CLARK COUNTY SCHOOL DISTRICT POLICE DEPARTMENT (collectively  
8 “CCSD Defendants”). **ECF No. 1, Exhibit A.**
- 9  
10 2. On October 2, 2024, CCSD Defendants filed a Notice of Removal of Civil Action. **ECF**  
11 **No. 1.**
- 12  
13 3. On October 3, 2024, this Court entered an Order that required Plaintiffs to obtain counsel  
14 by November 4, 2024. **ECF No. 4.**
- 15  
16 4. On October 9, 2024, CCSD Defendants filed a Motion to Extend Deadline to Respond to  
17 Complaint. **ECF No. 5.**
- 18  
19 5. On October 10, 2024, the Motion to Extend was denied and CCSD Defendants were  
20 ordered to file an answer or other responsive pleading by October 17, 2024. **ECF No. 6.**
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22 6. On October 17, 2024, CCSD Defendants filed a Motion to Dismiss. **ECF No. 8.**
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24 7. On November 4, 2024, Plaintiffs filed a Motion to Extend Time to Secure Counsel. **ECF**  
25 **No. 11.**
- 26  
27 8. On November 5, 2024, the Motion to Extend was granted, Plaintiffs’ counsel was ordered  
28 to file a notice of appearance by November 18, 2024. **ECF No. 12.**

- 1 9. On November 21, 2024, this Court ordered Plaintiffs' counsel to file a notice of  
2 appearance by November 26, 2024. The Order provided that failure to comply with the  
3 order may result in dismissal of the representative claims. **ECF No. 13.**
- 4 10. On November 27, 2024, Attorney Carl E.G. Arnold, Esq., filed a Notice of Appearance on  
5 behalf of Plaintiff Otis Tanner, an individual. **ECF No. 14.**
- 6 11. On December 3, 2024, this Court ordered the Parties to file a Joint Discovery Plan by  
7 December 10, 2024. **ECF No. 15.**
- 8 12. On December 16, 2024, the Parties filed an Amended Stipulated Discovery Plan and  
9 Scheduling Order. **ECF No. 18.**
- 10 13. On December 17, 2024, this Court entered an Order giving Plaintiffs' counsel until  
11 December 31, 2024 to file a response to CCSD Defendants' Motion to Dismiss. **ECF No.**  
12 **19.**
- 13 14. On December 17, 2024, this Court entered an Order granting the Amended Stipulated  
14 Discovery Plan and Scheduling Order. **ECF No. 20.**
- 15 15. On December 31, 2024, the parties filed a joint stipulation requesting a 60 day stay of this  
16 case, including all dates and deadlines now pending – which includes Plaintiffs' deadline  
17 to submit a response to CCSD Defendants' Motion to Dismiss. **ECF No. 22.**
- 18 16. The Parties indicated in the December 31, 2024, filing that a stay of this case and all of its  
19 accompanying deadlines would provide the Parties a chance to explore settlement  
20 including alternative dispute resolution options in order to preserve costs, attorney's fees,  
21 and judicial resources. **ECF No. 22.**
- 22 17. On January 2, 2025, this Court entered an Order granting a stay through March 2, 2025.  
23 **ECF No. 23.** A status report was due on or before March 3, 2025. **ECF No. 23.**
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1 18. During the 60 day time period, the parties discussed, an amended complaint, and the scope  
2 of discovery in the event claims are narrowed. Settlement was also discussed.

3 19. The Parties were unable to reach a compromise before the 60 day time period expired.  
4 Therefore, the parties are jointly submitting a second request that this matter be stayed for  
5 an additional 60 days.  
6

7 20. CCSD Defendants agree that if settlement efforts prove futile, Plaintiffs may lift the stay,  
8 respond to Defendants' Motion to Dismiss, and proceed with litigation in the ordinary  
9 course or as instructed by this Court.

10 21. In the event that settlement efforts prove futile and the stay is lifted, the Parties mutually  
11 agree to not unreasonably delay, postpone, or oppose discovery efforts and to cooperate in  
12 good faith.  
13

14 22. This is the second stipulation to stay these proceedings, and this request is made in good  
15 faith and is not sought any improper purpose or for the purpose of delay.

16 IT IS SO STIPULATED.

17 DATED this 5<sup>th</sup> day of March, 2025.

DATED this 5<sup>th</sup> day of March, 2025.

18 CLARK COUNTY SCHOOL DISTRICT  
19 OFFICE OF THE GENERAL COUNSEL

CEGA LAW GROUP

20 By: /s/ Sami Randolph  
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By: /s/ Carl E.G. Arnold  
Carl E.G. Arnold, Esq.  
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770 Coronado Center Drive, Suite 100  
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*Attorney for Plaintiffs*

ORDER

Based on the parties' stipulation [ECF No. 24] and good cause appearing, **IT IS ORDERED** that

1. This case is hereby STAYED for an additional 60 days until May 5, 2025.<sup>1</sup>
2. The Parties must file a Joint Status Report with the Court on or before May 5, 2025.

  
UNITED STATES DISTRICT JUDGE

DATED: 3/5/25

Submitted by:

CLARK COUNTY SCHOOL DISTRICT  
OFFICE OF THE GENERAL COUNSEL

By: /s/ Sami Randolph

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*Steven Jackson, Kimberly Perry-Carter,*  
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<sup>1</sup> Sixty days falls on Sunday, May 4, 2025.