

1 CLARK COUNTY SCHOOL DISTRICT
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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

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

18 Plaintiffs,
19 vs.

20 CLARK COUNTY SCHOOL DISTRICT;
21 STEVEN JACKSON, an Individual;
22 KIMBERLY PERRY-CARTER, Valley
23 High School Principal; CLARK COUNTY
24 SCHOOL DISTRICT POLICE
25 DEPARTMENT, DOES I through XX; and
26 ROE BUSINESS ENTITIES I through XX,
27 inclusive,

28 Defendants.

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

**STIPULATION AND ORDER TO
STAY CASE**

[SECOND REQUEST]

ECF No. 24

29
30 Defendants CLARK COUNTY SCHOOL DISTRICT, STEVEN JACKSON,
31 KIMBERLY PERRY-CARTER, AND CLARK COUNTY SCHOOL DISTRICT POLICE
32 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 2. On October 2, 2024, CCSD Defendants filed a Notice of Removal of Civil Action. **ECF**
10 **No. 1.**
- 11 3. On October 3, 2024, this Court entered an Order that required Plaintiffs to obtain counsel
12 by November 4, 2024. **ECF. No. 4.**
- 13 4. On October 9, 2024, CCSD Defendants filed a Motion to Extend Deadline to Respond to
14 Complaint. **ECF No. 5.**
- 15 5. On October 10, 2024, the Motion to Extend was denied and CCSD Defendants were
16 ordered to file an answer or other responsive pleading by October 17, 2024. **ECF No. 6.**
- 17 6. On October 17, 2024, CCSD Defendants filed a Motion to Dismiss. **ECF No. 8.**
- 18 7. On November 4, 2024, Plaintiffs filed a Motion to Extend Time to Secure Counsel. **ECF**
19 **No. 11.**
- 20 8. On November 5, 2024, the Motion to Extend was granted, Plaintiffs’ counsel was ordered
21 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 20. CCSD Defendants agree that if settlement efforts prove futile, Plaintiffs may lift the stay,
7 respond to Defendants' Motion to Dismiss, and proceed with litigation in the ordinary
8 course or as instructed by this Court.
9
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 5th day of March, 2025.

18 CLARK COUNTY SCHOOL DISTRCT
19 OFFICE OF THE GENERAL COUNSEL

20 By: /s/ Sami Randolph
21 Sami Randolph, Esq.
22 Nevada Bar No. 7876
23 5100 West Sahara Avenue
24 Las Vegas, NV 89146
25 *Attorney for Defendants*
26 *Clark County School District,*
27 *Steven Jackson, Kimberly Perry-Carter,*
28 *and Clark County School District*
29 *Police Department*

30 DATED this 5th day of March, 2025.

31 CEGA LAW GROUP

32 By: /s/ Carl E.G. Arnold
33 Carl E.G. Arnold, Esq.
34 Nevada Bar No. 8358
35 770 Coronado Center Drive, Suite 100
36 Henderson, NV 89052
37 *Attorney for Plaintiffs*

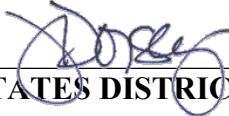
1 ORDER

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

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4 1. This case is hereby STAYED for an additional 60 days until May 5, 2025.¹

5 2. The Parties must file a Joint Status Report with the Court on or before May 5, 2025.

6 
7 **UNITED STATES DISTRICT JUDGE**

8 3/5/25
9 **DATED:** _____

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11 Submitted by:

12 CLARK COUNTY SCHOOL DISTRICT
13 OFFICE OF THE GENERAL COUNSEL

14

15 By: /s/ Sami Randolph

16 Sami Randolph, Esq.
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Police Department

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27 ¹ Sixty days falls on Sunday, May 4, 2025.

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