

1 STEVEN H. ROSENBAUM, Chief  
2 R. TAMAR HAGLER, Deputy Chief  
3 JESSICA CROCKETT, Trial Attorney  
4 United States Department of Justice  
5 950 Pennsylvania Avenue NW  
6 Washington, DC 20530  
7 Tel: (202) 305-4013  
8 Fax: (202) 514-1116  
9 [jessica.crockett@usdoj.gov](mailto:jessica.crockett@usdoj.gov)

Attorneys for Plaintiff United States of America

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

10 SILVER STATE FAIR HOUSING ) Case No. 3:12-CV-00229-RCJ (VPC)  
11 COUNCIL, INC., and JOYCE EVELYN )  
12 RUANO, )

13 Plaintiffs, )

14 v. )

15 ROSEWOOD PARK, LLC and )  
16 MAGGIE CUEVAS, )

17 Defendants. )

18 

---

19 UNITED STATES OF AMERICA, )

20 Plaintiff, )

21 v. )

22 ROSEWOOD PARK, LLC, )  
23 BUFF MANAGEMENT, INC., CHAIM )  
24 FREEMAN, JANE NOWACK, and )  
25 MAGGIE CUEVAS )

26 Defendants. )  
27 

---

28

1           The United States respectfully moves this Court to excuse Housing and Civil  
2 Enforcement Chief Steven H. Rosenbaum and Deputy Chief R. Tamar Hagler from the  
3 settlement conference scheduled for September 12, 2013. Pursuant to the Court's Order dated  
4 August 13, 2013 (ECF No. 80), all counsel who will be litigating the case, as well as an  
5 authorized representative with final settlement authority must attend the settlement conference.  
6

7           The United States will be represented at the settlement conference by Civil Rights  
8 Division Trial Attorneys Jessica Crockett and Roger Severino who expect to try the case if no  
9 settlement is reached. Ms. Crockett and Mr. Severino will have authority to negotiate an  
10 agreement in principle at the settlement conference. However, any final resolution will need to  
11 be approved by Steven H. Rosenbaum, Chief of the Housing and Civil Enforcement Section of  
12 the Civil Rights Division, as well as R. Tamar Hagler, Deputy Chief of the Housing and Civil  
13 Enforcement Section.  
14

15           Both Mr. Rosenbaum and Ms. Hagler are based in Washington, D.C. Mr. Rosenbaum  
16 leads the Housing and Civil Enforcement Section, and Ms. Hagler is one of six deputy chiefs in  
17 the Section. The Chief as well as the deputy chiefs are responsible for overseeing fair housing  
18 cases across the country. Their supervisory duties and management responsibilities make it  
19 difficult for them to attend the settlement conference in person. However, in the event that this  
20 motion is granted, Mr. Rosenbaum, Ms. Hagler, or an authorized designee will be available by  
21 telephone for the entire settlement conference. Plaintiffs Silver State Fair Housing Council, Inc.  
22 and Ms. Ruano do not oppose this Motion. Additionally, based on representations from  
23 opposing counsel, it is our understanding that the insurance carrier for Defendants will be present  
24 at the conference.  
25  
26  
27  
28

1 For the foregoing reasons, the United States respectfully requests that Housing and Civil  
2 Enforcement Section Chief Steven H. Rosenbaum and Deputy Chief R. Tamar Hagler be  
3 excused from the September 12, 2013 settlement conference.  
4

5 Dated: September 5, 2013  
6

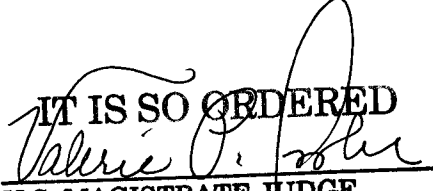
7 Respectfully submitted,

8 UNITED STATES OF AMERICA  
9

10 /s/ Jessica Crockett  
11 STEVEN H. ROSENBAUM, Chief  
12 R. TAMAR HAGLER, Deputy Chief  
13 JESSICA CROCKETT, Trial Attorney  
14 Housing and Civil Enforcement Section  
15 Civil Rights Division  
16 U.S. Department of Justice  
17 950 Pennsylvania Avenue, NW  
18 Northwestern Building, 7th Floor  
19 Washington, DC 20530  
20 Tel: (202) 305-4013  
21 Fax: (202) 514-1116

22 DANIEL G. BOGDEN, United States Attorney  
23 HOLLY A. VANCE, Assistant United States Attorney  
24 100 West Liberty Street, Suite 600  
25 Reno, Nevada  
26 Tel: (775) 784-5438  
27 Fax: (775) 784-5181  
28

Attorneys for the United States

**IT IS SO ORDERED**  
  
**U.S. MAGISTRATE JUDGE**  
DATED: September 6, 2013

**CERTIFICATE OF SERVICE**

1  
2 I certify that on September 5, 2013, I caused a copy of the foregoing *United States'*  
3 *Unopposed Motion to Excuse Chief and Deputy Chief from Settlement Conference* to be sent via  
the Court's ECF system to the following:

4 Jennifer Supman  
5 Manning & Kass, Ellrod, Ramirez, Trester LLP  
6 One California Street, Suite 1100  
7 San Francisco, CA 94111  
8 [jxs@manningllp.com](mailto:jxs@manningllp.com)  
*Attorney for Defendants Rosewood Park, LLC, Buff Management, Inc., Chaim*  
*Freeman, Janet Nowack, and Maggie Cuevas*

9 Christopher Brancart  
10 Brancart & Brancart  
11 Post Office Box 686  
12 Pescadero, California 94060  
13 [cbrancart@brancart.com](mailto:cbrancart@brancart.com)  
*Attorney for Plaintiffs Silver State Fair Housing Council, Inc., Joyce Ruano, Greg*  
*Ruano, and Josh Ruano*

14  
15 /s/ Jessica C. Crockett  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28