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Attorneys for Defendants Romeo Aranas, Isidro Baca,
 7 *Dwayne Baze, Robert Bannister, Barbara Cegavske,*
Travis Bennett, Stephen Daniels, James Dzurenda,
 8 *Travis Fratis, Aaron Harroun, Daniel Henson,*
Christopher Jones, Adam Laxalt, Valaree Olivas,
 9 *Brian Sandoval, Robert Schofield, Holly Skulstad,*
 10 *Ronald Waldo, Corrections Officer White and*
State of Nevada ex rel. Board of Prison Commissioners

11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

13 ROY TROST aka DAISY MEADOWS,
 14 Plaintiff,
 15 v.

Case No. 3:14-cv-00611-MMD-WGC

**STIPULATION AND ORDER FOR 45-
 DAY STAY FOR SETTLEMENT
 NEGOTIATIONS**

16 STATE OF NEVADA, ex rel., BOARD OF
 PRISON COMMISSIONERS; BRIAN
 17 SANDOVAL, In his official capacity; ADAM
 LAXALT, in his official capacity; BARBARA
 18 CEGAVSKE, in her official capacity; JAMES
 DZURENDA, in his official capacity; ISIDRO
 19 BACA in his individual capacity; ROBERT
 BANNISTER, in his individual and official
 20 capacity; REMO ARANAS, in his individual
 and official capacities; ROBERT
 21 SCHOFIELD, in his individual capacity;
 STEPHEN DANIELS, in his individual
 22 capacity; VALAREE OLIVAS, in her
 individual Capacity; DWAYNE BAZE in his
 23 individual and official capacities; RONALD
 RALDO in his individual and official
 24 capacities; CHRISTOPHER JONES in his
 individual capacity; CORRECTIONS
 25 OFFICER WHITE in his individual capacity;
 DANIEL HENSON, in his individual
 26 capacity; TRAVIS BENNETT in his
 individual capacity; AARON HARROUN, in
 27 his individual capacity; TRAVIS FRATIS, in
 his individual capacity; and HOLLY
 28 SKULSTAD, in her individual capacity;

Defendants.

1 The parties to this action, by their respective counsel, having agreed to the
2 following, and for good cause shown, hereby stipulate and agree to stay this case for forty-
3 five (45) days for settlement negotiations. The parties have agreed to the general terms
4 of settlement.

5 To that end, the parties have exchanged the first draft of the settlement documents
6 and are in negotiations over the wording and execution of certain non-monetary terms,
7 given the interstate nature of Plaintiff's housing and evolving medical and legal stances
8 in regards to the central issues of the case, and the format of certain clauses to ensure an
9 enforceable contract.

10 The stay period will commence the day following the entry of this Court's order in
11 this regard. The parties further stipulate that, in the event that they are unable to
12 negotiate a resolution to this litigation, the parties will submit a revised scheduling order,
13 accounting for a 45-day extension of time and the time spent negotiating the settlement.
14 The parties have agreed to the primary and material terms of settlement.

15 This Request for stay is not sought for any improper purpose or other purpose of
16 delay. Rather, it is sought by the parties solely for the purpose of facilitating settlement.
17 The parties recognize and submit that they are cognizant of the age of this case and
18 Magistrate Judge Cobb's admonishments regarding the same at the previous case
19 conference.

20 Moreover, a stay is necessary because counsel for Plaintiff has been in an ongoing,
21 multi-week preliminary injunction hearing in Eighth Judicial District Court for *Serenity*
22 *Wellness Center, LLC, et al. v. State of Nevada Department of Taxation* (Case No. A-19-
23 786962-B), *MM Development Company, Inc., et al. v. State of Nevada, Department of*
24 *Taxation* (Case No. A-18-785818-W), and *ETW Management Group LLC v. Nevada Dept*
25 *of Taxation* (Case No. A-19-787004-B) which began on May 24, 2019.

26 The parties note that the previous stay ended on May 31, 2019 and this order
27 would set forth a new stay. The parties remain available for a teleconference should the
28 Court have any questions or concerns on the settlement or as to reasons for delay.

1 The parties wish to avoid any unnecessary litigation costs that could arise in
2 conjunction with litigating this matter before the Court in association with the above
3 deadlines. For these reasons, the parties request that this Court enter its order staying
4 this case for forty-five (45) days.

5 DATED this 7th day of June, 2019.

DATED this 7th day of June, 2019.

6 **NEVADA ATTORNEY GENERAL**

MCLETCHIE LAW

7 /s/ Frank A. Toddre II
8 Frank A. Toddre II, NBN 11474
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10 Public Safety Division
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13 *Attorney for Defendants*

/s/ Margaret A. McLetchie
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Attorneys for Plaintiff

14 IT IS SO ORDERED.

15 DATED: June 7, 2019.

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18 UNITED STATES MAGISTRATE JUDGE
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