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Northern Nevada Electrical Workers Health & Welfare Trust Fund, et al.

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UNITED STATES DISTRICT COURT

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DISTRICT OF NEVADA

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NORTHERN NEVADA ELECTRICAL
13 WORKERS HEALTH & WELFARE
14 TRUST FUND; ELECTRICAL WORKERS
15 DEFINED CONTRIBUTION PENSION
16 PLAN FOR NORTHERN NEVADA;
17 NORTHERN NEVADA ELECTRICAL
18 JOINT APPRENTICESHIP AND
19 TRAINING COMMITTEE TRUST FUND;
20 NATIONAL ELECTRICAL INDUSTRY
21 FUND; LOCAL LABOR-MANAGEMENT
22 COOPERATION FUND; NATIONAL
23 LABOR-MANAGEMENT
24 COOPERATION FUND,
25 ADMINISTRATIVE MAINTENANCE
26 FUND; and the NATIONAL ELECTRICAL
27 BENEFIT FUND,

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Plaintiffs,

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v.

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EVO ELECTRIC LLC; DAVID
24 MANSFIELD, RICHARD SAMUEL
25 BACARELLA; JOSEPH KRUSE; PHILLIP
26 DANIEL PRUZENSKY; OHIO
CASUALTY INSURANCE COMPANY
DBA LIBERTY MUTUAL INSURANCE
COMPANY DOES 1-10, inclusive; ROE
ENTITIES I-X, inclusive,

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Defendants.

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CASE NO: 3:24-cv-00125-MMD-CSD

ORDER GRANTING

**JOINT STIPULATION FOR
DISMISSAL OF CLAIMS AND
COUNTERCLAIMS BETWEEN
PLAINTIFFS AND DEFENDANTS
BACARELLA AND PRUZENSKY**

1 Plaintiffs, NORTHERN NEVADA ELECTRICAL WORKERS HEALTH & WELFARE
2 TRUST FUND; ELECTRICAL WORKERS DEFINED CONTRIBUTION PENSION PLAN FOR
3 NORTHERN NEVADA; NORTHERN NEVADA ELECTRICAL JOINT APPRENTICESHIP
4 AND TRAINING COMMITTEE TRUST FUND; NATIONAL ELECTRICAL INDUSTRY
5 FUND; LOCAL LABOR-MANAGEMENT COOPERATION FUND; NATIONAL LABOR-
6 MANAGEMENT COOPERATION FUND, ADMINISTRATIVE MAINTENANCE FUND; and
7 the NATIONAL ELECTRICAL BENEFIT FUND (“**Plaintiffs**”), and Defendants RICHARD
8 SAMUEL BACARELLA; JOSEPH KRUSE; PHILLIP DANIEL PRUZENSKY (“**Defendants**”)
9 and together with Plaintiffs, the “**Parties**”), by and through their undersigned counsel, hereby
10 stipulate to an entry of Dismissal With Prejudice of all of the Plaintiffs causes of action against
11 Defendants Bacarella and Pruzensky and Defendants Bacarella and Puzensky’s counterclaims
12 against Plaintiffs in this action.

13 Left unaffected by this stipulation are the Plaintiffs’ claims and causes of action remaining
14 against currently defaulted defendants DAVID MANSFIELD and JOSEPH KRUSE and
15 Defendants’ Bacarella and Pruzensky’s crossclaims against EVO ELECTRIC LLC and DAVID
16 MANSFIELD. Those claims remain live in this action.

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1 The Parties further stipulate that they will each bear their respective costs and attorney's
2 fees.

3 IT IS SO STIPULATED.

5 DATED March 5, 2025

6 LAW OFFICE OF HEATHR A. IJAMES

7 */s/ Heather Ijames, Esq.*

8 HEATHER IJAMES

9 Nevada State Bar No. 13698

10 63 Keystone Ave., Ste. 101

11 Reno, NV 89503

12 Tel: 702.870.9199

13 *Attorneys for Defendants Richard Samuel
14 Bacarella and Philip Daniel Pruzensky*

5 DATED March 5, 2025

6 REESE RING VELTO, PLLC

7 */s/ Nathan R. Ring, Esq.*

8 Nathan R. Ring

9 Nevada State Bar No. 12078

10 3100 W. Charleston Blvd., Ste. 208

11 Las Vegas, NV 89102

12 Telephone: 725-235-9750

13 *Attorney for Plaintiffs*

15 IT IS SO ORDERED.

16 DATED this 5th day of March 2025.

17 By:



18 UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of March, 2025, I electronically filed the above and foregoing:

**JOINT STIPULATION FOR DISMISSAL OF CLAIMS AND COUNTERCLAIMS
BETWEEN PLAINTIFFS AND DEFENDANTS BACARELLA AND PRUZENSKY**

with the Clerk of the Court using the CM/ECF e-filing system, which provided notice of filing to all registered participants and parties in this case.

Dated this 5th day of March, 2025

/s/ Michelle Wade
An Employee of Reese Ring Veltro, PLLC