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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PAMELA BACHMANN, an individual,
Plaintiff,

vs.

STATE OF NEVADA DEPARTMENT OF
TRANSPORTATION, a public entity; JAMES
WHALEN, an individual; DOES I through X,
inclusive; and ROE COOPERATIONS I through
X, inclusive,

Defendant.

Case No.: 3:24-cv-00382-CSD

**ORDER GRANTING
STIPULATION TO WITHDRAW
MOTION TO DISMISS AND STAY
DISCOVERY**

Plaintiff PAMELA BACHMANN (hereinafter “Plaintiff”), by and through her counsel of record Astrid A. Perez, Esq of Sagebrush Law Group, PLLC, and Defendants STATE OF NEVADA DEPARTMENT OF TRANSPORTATION, and JAMES WHALEN, (collectively, “Defendants”), by and through its counsel of record AARON D. FORD, Attorney General for the State of Nevada, DANIEL R. HANSEN, Esq. Deputy Attorney General. of the Office of the Attorney General, hereby stipulate and submit to the Court for consideration the following STIPULATION TO WITHDRAW MOTION TO DISMISS AND STAY DISCOVERY.

On Thursday, March 6, 2025, the parties attended and participated in good faith the Early Neutral Evaluation. The parties were unable to reach a resolution, but have agreed to participate in a continued ENE, scheduled for April 10, 2025, at 9 a.m. In consideration of the continued ENE, the parties have agreed to withdraw the Motion to Dismiss pending before the Court and maintain

1 the stay of discovery. The parties agree that if the matter is not resolved at the continued ENE, the
2 parties will refile the withdrawn Motion to Dismiss [ECF 8], Opposition to Motion to Dismiss
3 [ECF 10], and Reply in Support of Motion to Dismiss [ECF 11]. The Motion to Dismiss will be
4 filed within 7 days of the continued ENE. The Opposition to the Motion to Dismiss will be filed
5 within 4 days of the refiled Motion to Dismiss. The Reply in Support of Motion to Dismiss will
6 be filed within 4 days of the days of the refiled Opposition to the Motion to Dismiss. All refiled
7 documents will be identical to the originally filed documents.

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9 The stay of discovery will remain in effect until said decision has been made on the
10 renewed Motion to Dismiss.

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13 Dated this 10th day of March, 2025

14 /s/ *Astrid A. Perez*

15 Astrid A. Perez, Esq. (NSB 15977)
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21 Dated this 7th day of March, 2025

22 /s/ *Daniel R. Hansen*

23 DANIEL R. HANSEN
24 Nevada Bar No. 14536
25 Deputy Attorney General
Attorney for Defendants, State of Nevada-
Department of Transportation, James
Whalen, an individual.

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28 **IT IS SO ORDERED:**

29 Dated this 10th of March, 2025.

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39 **UNITED STATES MAGISTRATE JUDGE**