

1 **SAO**  
2 LYSSA S. ANDERSON  
3 Nevada Bar No. 5781  
4 KRISTOPHER J. KALKOWSKI  
5 Nevada Bar No. 14892  
6 TRAVIS C. STUDDARD  
7 Nevada Bar No. 16454  
8 KAEMPFER CROWELL  
9 1980 Festival Plaza Drive, Suite 650  
10 Las Vegas, Nevada 89135  
11 Telephone: (702) 792-7000  
12 Fax: (702) 796-7181  
13 [landerson@kcnvlaw.com](mailto:landerson@kcnvlaw.com)  
14 [kkalkowski@kcnvlaw.com](mailto:kkalkowski@kcnvlaw.com)  
15 [tstuddard@kcnvlaw.com](mailto:tstuddard@kcnvlaw.com)

16 *Attorneys for Las Vegas Metropolitan Police Department*

17

18 **DISTRICT COURT**

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20 **CLARK COUNTY, NEVADA**

21

22 AMERICAN CIVIL LIBERTIES UNION OF  
23 NEVADA,

24 Case No.: A-25-922734-W  
Dept. No. 9

12

Petitioner,

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vs.

14 **STIPULATION AND ORDER TO STAY  
15 MATTER FOR 30 DAYS**

16

17 LAS VEGAS METROPOLITAN POLICE  
18 DEPARTMENT, a governmental entity,

19 **(FIRST REQUEST)**

20

21 Respondent.

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23 Petitioner American Civil Liberties Union of Nevada (“ACLU”) and Respondent Las  
24 Vegas Metropolitan Police Department (“LVMPD”), stipulate to extend the deadline for filing a  
response to ACLU’s Petition for Writ of Mandamus (Doc. 1) to September 4, 2025.

25

26 Although the Court has not set a deadline for LVMPD to respond to ACLU’s Petition, the  
27 parties are actively engaged in discussions and seek to resolve the matter without further  
28 intervention from this Court. In the interest of reaching a resolution agreeable to both parties and  
29 to preserve the Court’s limited resources, the parties seek a stay of this matter until September 4,

1 2025, to allow them to continue to meet and confer in good faith and pursue a potential resolution.

2 This Stipulation is made in good faith and not for the purpose of delay.

3 **ORDER**

4 Accordingly, it is hereby ORDERED that this matter is STAYED to September 4, 2025.

5 IT IS SO ORDERED.

6 DATED this \_\_\_\_ day of August, 2025.

Dated this 6th day of August, 2025

7 The court VACATES all dates in its August 1,  
8 2025, order directing an answer, reply, and  
9 scheduling oral argument. The court sets a  
10 STATUS CHECK on September 9, 2025, at 9:00  
11 AM for the parties to appear and advise on the  
12 status of their negotiations and steps moving  
13 forward.

  
\_\_\_\_\_  
Maria Gall

1B4 B78 8A8C 2241  
Maria Gall  
District Court Judge

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1 AMERICAN CIVIL LIBERTIES UNION  
2 OF NEVADA

3 */s/ Sadmira Ramic*

4 Sadmira Ramic, No. 15984  
5 Christopher M. Peterson, No. 13932  
6 4362 W. Cheyenne Ave.  
7 North Las Vegas, Nevada 89032  
[ramic@aclunv.org](mailto:ramic@aclunv.org)  
[peterson@aclunv.org](mailto:peterson@aclunv.org)

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*Attorneys for American Civil Liberties  
Union of Nevada*

KAEMPFER CROWELL

*/s/ Lyssa S. Anderson*

Lyssa S. Anderson, No. 5781  
Kristopher J. Kalkowski, No. 14892  
Travis C. Studdard, No. 16454  
1980 Festival Plaza Drive, Suite 650  
Las Vegas, Nevada 89135  
[landerson@kcnvlaw.com](mailto:landerson@kcnvlaw.com)  
[kkalkowski@kcnvlaw.com](mailto:kkalkowski@kcnvlaw.com)  
[tstuddard@kcnvlaw.com](mailto:tstuddard@kcnvlaw.com)

*Attorneys for Las Vegas Metropolitan Police  
Department*



Outlook

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## FW: ACLU Writ

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**From** Lyssa Anderson <[landerson@kcnvlaw.com](mailto:landerson@kcnvlaw.com)>

**Date** Fri 2025-08-01 8:36 AM

**To** Bonnie Jacobs <[BJacobs@kcnvlaw.com](mailto:BJacobs@kcnvlaw.com)>

**Cc** Travis Studdard <[tstuddard@kcnvlaw.com](mailto:tstuddard@kcnvlaw.com)>

Approval below.

KAEMPFER

CROWELL

Lyssa S. Anderson  
Kaempfer Crowell  
1980 Festival Plaza Drive, Suite 650  
Las Vegas, NV 89135-2958  
Tel: (702) 792-7000  
Fax: (702) 796-7181  
Email: [landerson@kcnvlaw.com](mailto:landerson@kcnvlaw.com)

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**From:** Lyssa Anderson

**Sent:** Thursday, July 31, 2025 11:01 AM

**To:** Sadmira Ramic <[ramic@aclunv.org](mailto:ramic@aclunv.org)>

**Cc:** Bonnie Jacobs <[BJacobs@kcnvlaw.com](mailto:BJacobs@kcnvlaw.com)>

**Subject:** Re: ACLU Writ

Absolutely. Thank you for catching that. We will make that change and get it on file.

Best Regards,  
Lyssa S. Anderson

On Jul 31, 2025, at 10:58 AM, Sadmira Ramic <[ramic@aclunv.org](mailto:ramic@aclunv.org)> wrote:

Good morning,  
Thank you for drafting the stip.  
The only suggestion I have is changing the date from September 1<sup>st</sup> to September 4<sup>th</sup>. September 1<sup>st</sup> is Labor Day, and I will be out of the office until September 4<sup>th</sup>. If that is OK with you, you may affix my signature.

---

**From:** Lyssa Anderson <[landerson@kcnvlaw.com](mailto:landerson@kcnvlaw.com)>  
**Sent:** Thursday, July 31, 2025 10:21 AM  
**To:** Sadmira Ramic <[ramic@aclunv.org](mailto:ramic@aclunv.org)>  
**Cc:** Bonnie Jacobs <[BJacobs@kcnvlaw.com](mailto:BJacobs@kcnvlaw.com)>  
**Subject:** RE: ACLU Writ

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Hi Sadmira,

Attached is the proposed stipulation in draft. Please let me know if you have any comments or changes. If not, may use your electronic signature for filing?

Best,  
Lyssa Anderson

<image001.gif>

Lyssa S. Anderson  
Kaempfer Crowell  
1980 Festival Plaza Drive, Suite 650  
Las Vegas, NV 89135-2958  
Tel: (702) 792-7000  
Fax: (702) 796-7181  
Email: [landerson@kcnvlaw.com](mailto:landerson@kcnvlaw.com)

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**From:** Lyssa Anderson  
**Sent:** Wednesday, July 30, 2025 4:07 PM  
**To:** Sadmira Ramic <[ramic@aclunv.org](mailto:ramic@aclunv.org)>  
**Subject:** RE: ACLU Writ

Sadmira,

Yes. I will prepare a draft stipulation and send it over for your review. I think the approach you laid out is a good one and once I have the letter we can set up a good time to go through it.

--Lyssa

<image001.gif>

Lyssa S. Anderson  
Kaempfer Crowell  
1980 Festival Plaza Drive, Suite 650  
Las Vegas, NV 89135-2958  
Tel: (702) 792-7000  
Fax: (702) 796-7181  
Email: [landerson@kcnvlaw.com](mailto:landerson@kcnvlaw.com)

1 CSERV

2

3 DISTRICT COURT  
CLARK COUNTY, NEVADA

4

5

6 ACLU of Nevada, Plaintiff(s)

CASE NO: A-25-922734-W

7 vs.

DEPT. NO. Department 9

8 Las Vegas Metropolitan Police  
9 Department, Defendant(s)

10

11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District  
13 Court. The foregoing Stipulation and Order was served via the court's electronic eFile system  
14 to all recipients registered for e-Service on the above entitled case as listed below:

15 Service Date: 8/6/2025

16 Lyssa Anderson landerson@kcnvlaw.com

17 Wendy Applegate wapplegate@kcnvlaw.com

18 Bonnie Jacobs bjacobs@kcnvlaw.com

19 Kristopher Kalkowski kkalkowski@kcnvlaw.com

20 Sadmira Ramic ramic@aclunv.org

21 Christopher Peterson peterson@aclunv.org

22 Travis Studdard tstuddard@kcnvlaw.com

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