

1 **SAO**

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16 *Attorneys for Las Vegas Metropolitan Police Department*

17
18 **DISTRICT COURT**

19 **CLARK COUNTY, NEVADA**

20 AMERICAN CIVIL LIBERTIES UNION OF
21 NEVADA,

22 Petitioner,

23 vs.

24 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a governmental entity,

Respondent.

Case No.: A-25-922734-W

Dept. No. 9

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

(FIRST REQUEST)

Petitioner American Civil Liberties Union of Nevada (“ACLU”) and Respondent Las 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.

Although the Court has not set a deadline for LVMPD to respond to ACLU’s Petition, the parties are actively engaged in discussions and seek to resolve the matter without further intervention from this Court. In the interest of reaching a resolution agreeable to both parties and 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
scheduling oral argument. The court sets a
9 STATUS CHECK on September 9, 2025, at 9:00
AM for the parties to appear and advise on the
10 status of their negotiations and steps moving
forward.

A handwritten signature in black ink, reading "Maria Gall", is written over a horizontal line.

1B4 B78 8A8C 2241
Maria Gall
District Court Judge

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
8 ramic@aclunv.org
9 peterson@aclunv.org

10 *Attorneys for American Civil Liberties*
11 *Union of Nevada*

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/s/ Lyssa S. Anderson

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Attorneys for Las Vegas Metropolitan Police
Department

FW: ACLU Writ

From Lyssa Anderson <landerson@kcnvlaw.com>

Date Fri 2025-08-01 8:36 AM

To Bonnie Jacobs <BJacobs@kcnvlaw.com>

Cc Travis Studdard <tstuddard@kcnvlaw.com>

Approval below.

KAEMPFER

CROWELL

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This email may contain information that is confidential or protected by the attorney-client privilege. If you received it in error, please notify the sender immediately.

From: Lyssa Anderson

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

To: Sadmira Ramic <ramic@aclunv.org>

Cc: Bonnie Jacobs <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> wrote:

Good morning,

Thank you for drafting the stip.

The only suggestion I have is changing the date from September 1st to September 4th. September 1st is Labor Day, and I will be out of the office until September 4th.

If that is OK with you, you may affix my signature.

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

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>

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From: Lyssa Anderson
Sent: Wednesday, July 30, 2025 4:07 PM
To: Sadmira Ramic <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>

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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
to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 8/6/2025

15 Lyssa Anderson

landerson@kcnvlaw.com

16 Wendy Applegate

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17 Bonnie Jacobs

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