

Attorneys for Las Vegas Metropolitan Police Department

DISTRICT COURT

CLARK COUNTY, NEVADA

12 AMERICAN CIVIL LIBERTIES UNION OF NEVADA.

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

15 Petitioner.

14 | VS.

**STIPULATION AND ORDER TO
EXTEND STAY FOR TWO WEEKS**

15 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a governmental entity.

(SECOND REQUEST)

Respondent.

18 Petitioner American Civil Liberties Union of Nevada (“ACLU”) and Respondent Las
19 Vegas Metropolitan Police Department (“LVMPD”), stipulate to extend the current stay of this
20 matter an additional two weeks to September 19, 2025.

21 The parties continue to actively engage in discussions to resolve the matter without further
22 intervention from this Court. Since the previous Order to stay the matter was entered (Doc. 6),
23 LVMPD has been, and remains, diligent in producing documents responsive to ACLU's Petition
24 for Writ of Mandamus. Doc. 1. Given the records' nature and electronic storage, production

requires additional time to review, redact protected information, and prepare a log identifying each document and its redactions.

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 19, 2025, to allow them to continue to meet and confer in good faith and pursue a potential resolution. The parties also seek to continue the Status Check previously set by this Court from September 9, 2025, to September 23, 2025.

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

ORDER

Accordingly, it is hereby ORDERED that this matter is STAYED to September 19, 2025;

It is further ORDERED that the STATUS CHECK currently set for September 9, 2025, is continued to September 23, 2025, at 9:00 A.M. for the parties to appear and advise the Court on the status of their negotiations and steps moving forward.

IT IS SO ORDERED.

DATED this ____ day of August, 2025.

Dated this 28th day of August, 2025

Maria Gall

**1B5 8B5 6956 1348
Maria Gall
District Court Judge**

1 AMERICAN CIVIL LIBERTIES UNION
2 OF NEVADA

3 */s/ Sadmira Ramic*

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*Attorneys for American Civil Liberties
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/s/ Lyssa S. Anderson

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Bonnie Jacobs

From: Sadmira Ramic <ramic@aclunv.org>
Sent: Thursday, August 28, 2025 9:51 AM
To: Travis Studdard
Cc: Lyssa Anderson; Bonnie Jacobs
Subject: Re: ACLU Writ

Good morning,
I have no edits.
You have my permission to use my e-signature.

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From: Travis Studdard <tstuddard@kcnvlaw.com>
Sent: Thursday, August 28, 2025 9:15:23 AM
To: Sadmira Ramic <ramic@aclunv.org>
Cc: Lyssa Anderson <landerson@kcnvlaw.com>; Bonnie Jacobs <BJacobs@kcnvlaw.com>
Subject: Re: ACLU Writ

Hi Sadmira,

Thank you for agreeing to extend the stay. Enclosed is a draft SAO for your review. Please let me know if there are any changes you would like, and if I have permission to use your e-signature.

Best,

Travis



Travis Studdard
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This e-mail 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: Sadmira Ramic <ramic@aclunv.org>
Sent: Wednesday, August 27, 2025 5:48 PM

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3 DISTRICT COURT
CLARK COUNTY, NEVADA

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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)

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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: 8/28/2025

16 Lyssa Anderson landerson@kcnvlaw.com

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