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DISTRICT COURT

CLARK COUNTY, NEVADA

AMERICAN CIVIL LIBERTIES UNION OF
NEVADA,

Petitioner,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a governmental entity,

Respondent.

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

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

(THIRD REQUEST)

Petitioner American Civil Liberties Union of Nevada (“ACLU”) and Respondent Las Vegas Metropolitan Police Department (“LVMPD”), stipulate to extend the current stay of this matter an additional four weeks to October 17, 2025.

The parties continue to actively engage in discussions to resolve this matter without further Court intervention. Since the Court entered the prior stay (Doc. 7), LVMPD believes that it has produced all documents responsive to ACLU’s Petition for Writ of Mandamus. (Doc. 1). To preserve the Court’s limited resources and facilitate a resolution agreeable to both parties, the

1 parties seek a stay of this matter until October 17, 2025. The additional time will allow ACLU to
2 review the production, including the privilege log and supporting materials, and allow the parties
3 sufficient time to meet and confer in good faith to address any outstanding issues or concerns. The
4 parties also seek to continue the Status Check previously set by this Court from September 23,
5 2025, to October 21, 2025.

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

7 **ORDER**

8 Accordingly, it is hereby ORDERED that this matter is STAYED to October 17, 2025;

9 It is further ORDERED that the STATUS CHECK currently set for September 23, 2025,
10 is continued to October 21, 2025, at 9:00 A.M. for the parties to appear and advise the Court on
11 the status of their negotiations and steps moving forward.

12 IT IS SO ORDERED.

13 DATED this ____ day of September, 2025.

Dated this 17th day of September, 2025

14 
15 _____

16 EAF 335 D637 C444
17 Maria Gall
18 District Court Judge
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AMERICAN CIVIL LIBERTIES UNION
OF NEVADA

/s/ Sadmira Ramic

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*Attorneys for Las Vegas Metropolitan Police
Department*

Bonnie Jacobs

From: Travis Studdard
Sent: Wednesday, September 17, 2025 2:52 PM
To: Bonnie Jacobs
Subject: Fw: Eighth Judicial District Court - Proposed Order Returned
Attachments: 20250917 - SAO to Extend Stay.pdf; 20250917 - SAO to Extend Stay.docx

Hi Bonnie,

The enclosed SAO is ready to be re-submitted to the Department 9 inbox. Thanks.

Travis

From: Sadmira Ramic <ramic@aclunv.org>
Sent: Wednesday, September 17, 2025 2:48 PM
To: Travis Studdard <tstuddard@kcnvlaw.com>
Subject: RE: Eighth Judicial District Court - Proposed Order Returned

Yes, you may affix my signature.

From: Travis Studdard <tstuddard@kcnvlaw.com>
Sent: Wednesday, September 17, 2025 2:44 PM
To: Sadmira Ramic <ramic@aclunv.org>
Subject: Re: Eighth Judicial District Court - Proposed Order Returned

The revised SAO is enclosed. Do I have permission to apply your e-signature?

From: Sadmira Ramic <ramic@aclunv.org>
Sent: Wednesday, September 17, 2025 2:24 PM
To: Travis Studdard <tstuddard@kcnvlaw.com>
Cc: Lyssa Anderson <landerson@kcnvlaw.com>
Subject: RE: Eighth Judicial District Court - Proposed Order Returned

I can do either but 10/21 is preferred based on my schedule.

From: Travis Studdard <tstuddard@kcnvlaw.com>
Sent: Wednesday, September 17, 2025 11:42 AM
To: Sadmira Ramic <ramic@aclunv.org>
Cc: Lyssa Anderson <landerson@kcnvlaw.com>
Subject: Re: Eighth Judicial District Court - Proposed Order Returned

Hi Sadmira,

Department 9 is dark on 10/7 so we won't be able to hold the Status Check that day. See the email below. They offered to hold it on 10/14, but we have a conflict that day on our end. 10/21 or 10/28 are available, however. Would either of those dates work for you?

Please let me know, and I'll send you the revised SAO. Thank you.

Travis

From: Bonnie Jacobs <BJacobs@kcnvlaw.com>
Sent: Wednesday, September 17, 2025 10:53 AM
To: Travis Studdard <tstuddard@kcnvlaw.com>
Subject: FW: Eighth Judicial District Court - Proposed Order Returned

See below comments below from Dept. 9 & the need to change the status check hearing date.

Bonnie Jacobs
Paralegal for Lyssa Anderson, Kristopher Kalkowski, and Travis Studdard
Kaempfer Crowell

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: NoReply@clarkcountycourts.us <NoReply@clarkcountycourts.us>
Sent: Wednesday, September 17, 2025 10:38 AM
To: Bonnie Jacobs <BJacobs@kcnvlaw.com>
Subject: Eighth Judicial District Court - Proposed Order Returned

A-25-922734-W, ACLU v LVMPD, proposed Stip & Order to Ext Stay

Your proposed order or document requiring a judge's signature to the court has been returned for the following reason(s): The court is dark 10/7. The court can hold the status check on 10/14. In light of that, do the parties want to extend the stay? Please revise and resubmit as needed.

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: 9/17/2025

15 Lyssa Anderson

landerson@kcnvlaw.com

16 Wendy Applegate

wapplegate@kcnvlaw.com

17 Bonnie Jacobs

bjacobs@kcnvlaw.com

18 Kristopher Kalkowski

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19 Sadmira Ramic

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20 Christopher Peterson

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21 Travis Studdard

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