

1 **SAO**
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18 **DISTRICT COURT**

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20 **CLARK COUNTY, NEVADA**

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22 AMERICAN CIVIL LIBERTIES UNION OF
23 NEVADA,

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

12

13 Petitioner,

14 vs.

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

18 **STIPULATION AND ORDER TO
19 EXTEND STAY FOR FOUR WEEKS**

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21 Respondent.

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24 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 November 14, 2025.

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27 The parties continue to actively engage in discussions to resolve this matter without further
28 Court intervention. Since the Court entered the prior stay (Doc. 9), LVMPD has produced
29 documents which are responsive to the public record requests at issue in ACLU’s Petition for Writ
30 of Mandamus (Doc. 1), including some that are dated after the timeframe specified in the public

1 record requests. The only remaining issue to resolve is ACLU's Attorneys' Fees and Costs for
2 preparing and filing the Writ Petition. To preserve the Court's limited resources and facilitate a
3 resolution agreeable to both parties, the parties seek a stay of this matter until November 14, 2025.
4 The additional time will allow the parties to meet and confer to address ACLU's Attorneys' Fees
5 and Costs. The parties also seek to continue the Status Check previously set by this Court from
6 October 21, 2025, to November 18, 2025.

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

8 **ORDER**

9 Accordingly, it is hereby ORDERED that this matter is STAYED to November 14, 2025;

10 It is further ORDERED that the STATUS CHECK currently set for October 21, 2025, is
11 continued to November 18, 2025, at 9:00 A.M. for the parties to appear and advise the Court on
12 the status of their negotiations and steps moving forward.

13 IT IS SO ORDERED.

14 DATED this ____ day of October, 2025.

Dated this 19th day of October, 2025

15 
16 _____

17 CC9 148 97EA A14B
18 Maria Gall
19 District Court Judge
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24

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.
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*Attorneys for American Civil Liberties
Union of Nevada*

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/s/ Lyssa S. Anderson

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*Attorneys for Las Vegas Metropolitan Police
Department*



RE: SAO to Cont. Status Check

From Sadmira Ramic <ramic@aclunv.org>
Date Fri 2025-10-17 3:16 PM
To Travis Studdard <tstuddard@kcnvlaw.com>
Cc Lyssa Anderson <landerson@kcnvlaw.com>

1 attachment (57 KB)
20251017 - SAO to Extend Stay (002).docx;

Got it. I added language to make that clear, but please let me know if you think it should be phrased differently. If the added language is OK with you, my e-siganture can be added to the attached document.
Thank you for drafting the stip.

From: Travis Studdard <tstuddard@kcnvlaw.com>
Sent: Friday, October 17, 2025 2:57 PM
To: Sadmira Ramic <ramic@aclunv.org>
Cc: Lyssa Anderson <landerson@kcnvlaw.com>
Subject: Re: SAO to Cont. Status Check

Yes, that is correct.

From: Sadmira Ramic <ramic@aclunv.org>
Sent: Friday, October 17, 2025 2:56 PM
To: Travis Studdard <tstuddard@kcnvlaw.com>
Cc: Lyssa Anderson <landerson@kcnvlaw.com>
Subject: RE: SAO to Cont. Status Check

When you say "go beyond the scope of the Petition for Writ of Mandamus," are you referring to the documents that were produced outside of the timeframe in the public record requests?

From: Travis Studdard <tstuddard@kcnvlaw.com>
Sent: Friday, October 17, 2025 2:40 PM
To: Sadmira Ramic <ramic@aclunv.org>
Cc: Lyssa Anderson <landerson@kcnvlaw.com>
Subject: Re: SAO to Cont. Status Check

I rephrased the sentence referred to in #1, and also extended the requested stay to 11/14, which the status check on 11/18. Please let me know if you agree to these changes and if I can apply your e-signature.

From: Sadmira Ramic <ramic@aclunv.org>
Sent: Friday, October 17, 2025 2:22 PM
To: Travis Studdard <tstuddard@kcnvlaw.com>
Cc: Lyssa Anderson <landerson@kcnvlaw.com>
Subject: RE: SAO to Cont. Status Check

Thanks.

There are two things that I would like to amend before signing please:

1. Can we rephrase this sentence: "Since the Court entered the prior stay (Doc. 9), LVMPD and ACLU have agreed that LVMPD has produced all documents responsive to ACLU's Petition for Writ of Mandamus. (Doc. 1)." Could we say something along the lines of "Since the Court entered the prior stay (Doc. 9), LVMPD has produced over 3,000 documents responsive to the public record requests at issue in ACLU's Petition for Writ of Mandamus (Doc. 1)"?
2. I will be out of the country until 11/13. Can we make the status check the week of 11/17 some time?

From: Travis Studdard <tstuddard@kcnvlaw.com>
Sent: Friday, October 17, 2025 1:38 PM
To: Sadmira Ramic <ramic@aclunv.org>
Cc: Lyssa Anderson <landerson@kcnvlaw.com>
Subject: SAO to Cont. Status Check

Enclosed is the proposed SAO continuing the Stay for two weeks and setting the Status Check for November 4. Please let me know if I have your permission to apply your e-signature. Thank you.

Best,

Travis

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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: 10/19/2025

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

23 Jeff Garrett jgarrett@kcnvlaw.com

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