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15 Co-Attorneys for Plaintiffs
16 HENRY A. *et al.*

17 UNITED STATES DISTRICT COURT
18 DISTRICT OF NEVADA

19 HENRY A., by his next friend M.J.; CHARLES
and CHARLOTTE B., by their next friend R.D.;
20 LEO C.; VICTOR C.; MAIZY and JONATHAN D.
by their next friend S.W.; LINDA E.; CHRISTINE
21 F., and OLIVIA G. by their next friend E.F., and
MASON I., by his next friend M.J., individually
22 and on behalf of others so situated,

23 Plaintiffs,

24 vs.

25 MICHAEL WILLDEN, Director of the Nevada
Department of Health and Human Services; DIANE
26 COMEAUX, former Administrator of

27 *(Caption continued on following page.)*

Case No.: 2:10-CV-00528-RCJ-PAL

**STIPULATION AND [PROPOSED]
ORDER TO DISMISS ALL CLAIMS
OF HENRY A., CHARLES B.,
CHARLOTTE B., AND MASON I.
WITH PREJUDICE**


1 Nevada Division of Child and Family Services;
2 AMBER HOWELL, Administrator of Nevada
3 Division of Child and Family Services; VIRGINIA
4 VALENTINE, former Clark County Manager;
5 DON BURNETTE, Clark County Manager;
6 CLARK COUNTY; TOM MORTON, former
7 Director of Clark County Department of Family
8 Services; LISA RUIZ-LEE, Director of Clark
9 County Department of Family Services; SYLVIA
10 CLARK, Senior Family Services Specialist;
11 YVETTE CHEVALIER, Caregiver Services
12 Manager; TERESA CRAGON, Case Manager;
13 DARREL FORD, Licensing Investigator; DEBBIE
14 MALLWITZ, Family Services Specialist II;
15 PATRICIA MARTIN, Family Services Specialist;
16 THOR MARTINEZ, Family Services Specialist I;
17 PHILOMENA OSEMWENGIE, Senior Family
18 Services Specialist; STACEY SCOTT, Family
19 Services Specialist I; SONYA WEATHERS,
20 Family Services Specialist II; and DOES XI-XX,
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Defendants.

1 PLAINIFFS HENRY A., CHARLES B., CHARLOTTE B., and MASON I., and
2 DEFENDANTS HEREBY STIPULATE AND AGREE, by and through their respective counsel,
3 to the dismissal, with prejudice, of all claims of HENRY A., CHARLES B., CHARLOTTE B.,
4 and MASON I., as against all Defendants in the above-entitled matter, pursuant to Federal Rule
5 of Civil Procedure 41(a)(1)(A)(ii), but that the Court will retain personal and subject matter
6 jurisdiction solely for the purpose of enforcing the terms of the Settlement Agreement and
7 Release.

8 Except for the fees and costs to be paid by Clark County to Plaintiffs' counsel as provided
9 in the parties' Settlement Agreement and Release, which was the subject of Joint Petition for
10 Approval of Negotiated Attorneys' Fees & Costs approved by this Court [Dkt. 404], the parties
11 will bear their own fees and costs.

12 **IT IS SO STIPULATED**


13 DATED this 5th day of February, 2015.

14 
15 **ALVERSON TAYLOR MORTENSEN & SANDERS**
16 **MORRISON & FOERSTER LLP**
17 **NATIONAL CENTER FOR YOUTH LAW**
By Karie N. Wilson, Esq.
Attorneys for Plaintiffs

18 DATED this ___ day of _____, 2015.

19
20
21 **KOLESAR & LEATHAM**
By Alan Lefebvre, Esq.
Attorneys for Defendants Mallwitz
and Chevalier

22
23
24 DATED this 10 day of February 2015.

25 
26 **LEWIS BRISBOIS BISGAARD & SMITH LLP**
27 By Margaret G. Foley, Esq.
Attorneys for Clark County and Defendants Ruiz-Lee,
Morton, Burnette, Valentine, Clark, Cragon, Ford,
28 *Martin, Martinez, Osemwengie, Scott & Weathers*

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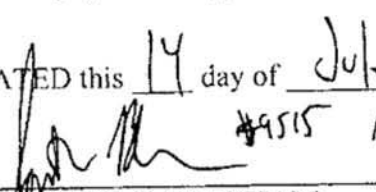
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9 in the parties' Settlement Agreement and Release, which was the subject of Joint Petition for
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11 will bear their own fees and costs.

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13 DATED this ____ day of _____, 2015.

14
15 **ALVERSON TAYLOR MORTENSEN & SANDERS**
16 **MORRISON & FOERSTER LLP**
17 **NATIONAL CENTER FOR YOUTH LAW**
By Karie N. Wilson, Esq.
Attorneys for Plaintiffs

18 DATED this 14 day of July, 2015.

19
20 
21 **KOLESAR & LEATHAM**
By Alan Lefebvre, Esq.
Attorneys for Defendants Mallwitz
and Chevalier

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24 DATED this ____ day of _____, 2015.

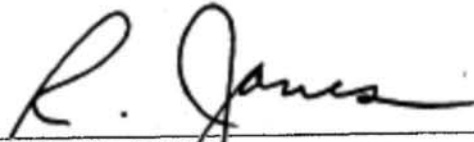
25
26 **LEWIS BRISBOIS BISGAARD & SMITH LLP**
By Margaret G. Foley, Esq.
27 *Attorneys for Clark County and Defendants Ruiz-Lee,*
Morton, Burnette, Valentine, Clark, Cragon, Ford,
28 *Martin, Martinez, Osemwengie, Scott & Weathers*

STIP. AND [PROPOSED] ORDER TO DISMISS ALL CLAIMS OF HENRY A., CHARLES B., CHARLOTTE B., AND MASON I.
WITH PREJUDICE
CASE NO. 2:10-CV-00528

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IT IS SO ORDERED.

Dated this 21st day of July, 2015.



ROBERT C. JONES
UNITED STATES DISTRICT JUDGE