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

**STIPULATION AND [PROPOSED]  
ORDER TO DISMISS ALL CLAIMS  
OF LEO C., VICTOR C., AND LINDA  
E. 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,

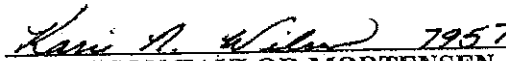
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Defendants.

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

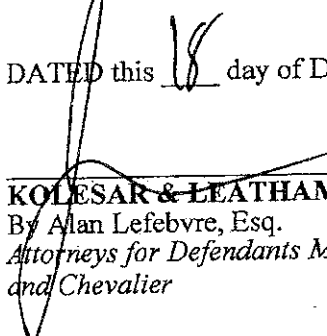
7 Except for the fees and costs to be paid by Clark County to Plaintiffs' counsel as provided  
8 in the parties' Settlement Agreement and Release, which are the subject of Plaintiff's Petition for  
9 Approval of Negotiated Attorney's Fees & Costs [Dkt. 388], the parties will bear their own fees  
10 and costs.

11 **IT IS SO STIPULATED**

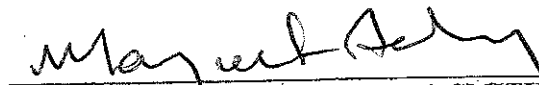
12 DATED this 16th day of December, 2014.

13   
14 **ALVERSON TAYLOR MORTENSEN & SANDERS**  
15 **MORRISON & FOERSTER LLP**  
16 **NATIONAL CENTER FOR YOUTH LAW**  
By Karie N. Wilson, Esq.  
*Attorneys for Plaintiffs*

17 DATED this 18 day of December, 2014.

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

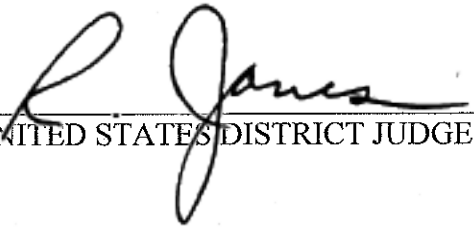
22 DATED this 18 day of December, 2014.

23  
24   
25 **LEWIS BRISBOIS BISGAARD & SMITH, LLP**  
26 By Margaret G. Foley, Esq.  
*Attorneys for Clark County and Defendants Ruiz-Lee,*  
*Morton, Burnette, Valentine, Clark, Cragon, Ford,*  
27 *Martin, Martinez, Osemwengie, Scott & Weathers*

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**IT IS SO ORDERED.**

Dated this 22nd day of January, 2015.

  
UNITED STATES DISTRICT JUDGE