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 11 **UNITED STATES DISTRICT COURT**  
 12 **DISTRICT OF NEVADA**  
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 15 *PRISON LEGAL NEWS*, a project of the )  
 HUMAN RIGHTS DEFENSE CENTER, a )  
 16 Washington Nonprofit Corporation )  
 PAUL WRIGHT (current publisher of Prison )  
 17 Legal News), )  
 Plaintiffs, )  
 18 vs. )  
 19 JACKIE CRAWFORD in her official capacity )  
 as the former director of NDOC, JOHN )  
 20 SLANSKY(*deceased*), in his official and )  
 individual capacities as former assistant )  
 21 director of NDOC, ROBERT BAYER, in his )  
 official and individual capacities as the former )  
 22 Director of NDOC, DOES I-XXV, Defendant )  
 RED ANDWHITE CORPORATIONS I-X, and )  
 23 BLACK AND BLUE STATE and/or )  
 MUNICIPAL ENTITIES I-X, PRISON LEGAL )  
 24 NEWS, *et al*, )  
 Defendants. )

Case No. 3:00-cv-00373-HDM-WGC  
 (CONSOLIDATED)

**STIPULATION AND ORDER OF  
 DISMISSAL WITH PREJUDICE, WITH  
 STIPULATION TO HOLD DISMISSAL IN  
 ABEYANCE**

1 PRISON LEGAL NEWS, a project of the )  
 2 HUMAN RIGHTS DEFENSE CENTER, a )  
 Washington Nonprofit Corporation, )  
 3 )  
 Plaintiffs, )  
 4 vs. )  
 5 JAMES GREG COX (in his official capacity) )  
 as Director of Nevada Department of )  
 6 Corrections; E.K. McDaniel (in his official )  
 capacity) as Deputy Director of Operations at )  
 7 NDOC; and DOES I - XXV, )  
 8 )  
 Defendants )

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 10 Plaintiff Prison Legal News, by and through counsel Allen Lichtenstein and Staci Pratt,  
 11 with *pro hac vice* counsel Lance Weber, Ernest Galvan and Lisa Ells, and Defendants James  
 12 Greg Cox and E.K. McDaniel, by and through counsel, Adam Paul Laxalt, Nevada Attorney  
 13 General, and Andrea R. Barraclough, Chief Deputy Attorney General, as a result of a  
 14 Settlement Agreement reached, hereby stipulate to the dismissal of this action with prejudice, in  
 15 accordance with the terms below.

16 First, per the Settlement Agreement, attached as Exhibit A, the parties agree that the  
 17 dismissal of the claims, though ordered, will be held in abeyance in any manner the Court  
 18 deems best to suit recordkeeping and docketing needs. The reason for the abeyance is so that  
 19 this Court may maintain jurisdiction for the purposes of entertaining any enforcement and  
 20 monitoring actions brought by Plaintiffs. Per the Settlement Agreement, the period of time for  
 21 abeyance will be no less than ten (10) years, at which time, the Defendants may move to end  
 22 the abeyance and have the court fully and finally dismiss the case with prejudice (with the  
 23 underlying 2000 Consent decree discussed in the Settlement Agreement surviving outside of  
 24 any dismissed dockets), thereby terminating the instant case number and its consolidated  
 25 docket number 3:13-cv-00346-HDM-WGC.

26 Second, per the Settlement Agreement, damages and attorney fees and costs were  
 27 combined into one-lump sum figure. Accordingly, for purposes of this motion so the Court need  
 28 not involve itself in a costs and fees analysis, the parties stipulate to the dismissal of this action

1 with prejudice, with each party to bear their own costs and fees up to and including the date of  
2 the Court's entry of this Order. This agreement on costs and fees, however, does not include  
3 any fees or costs accumulated henceforth as outlined in the Settlement Agreement for  
4 enforcement or monitoring.

5 RESPECTFULLY SUBMITTED, this 14th day of January, 2016.

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7 ADAM PAUL LAXALT  
Attorney General

Human Rights Defense Center

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9 By: /s/ Andrea Barraclough  
10 ANDREA R. BARRACLOUGH  
Chief Deputy Attorney General  
11 Nevada Bar No. 9158  
*Attorneys for Defendants*

By: /s/ Lance Weber  
LANCE WEBER  
*pro hac vice*  
General Counsel  
*Attorneys for Plaintiff*

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15 **APPROVED AND SO ORDERED:**

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17 \_\_\_\_\_  
18 HOWARD D. MCKIBBEN  
UNITED STATES DISTRICT JUDGE

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20 DATED: \_\_\_\_\_  
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