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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 VICTOR PEREZ, as Special Administrator of  
11 the Estate of CARLOS PEREZ, deceased;  
12 VICTOR PEREZ, as the Guardia Ad Litem for  
13 S.E.P., a minor; VICTOR PEREZ, as the  
14 Guardian Ad Litem for A.I.P., a minor,

15 Plaintiffs,

16 vs.

17 STATE OF NEVADA, ex.rel. NEVADA  
18 DEPARTMENT OF CORRECTIONS;  
19 DIRECTOR GREG COX, individually;  
20 WARDEN DWIGHT NEVEN, individually;  
21 ASSISTANT WARDEN TIMOTHY FILSON,  
22 individually; COT. RAMOS, individually;  
23 LIEUTENANT OLIVER, individually;  
24 CORRECTIONS OFFICER CASTRO,  
25 individually; CORRECTIONS OFFICER  
26 SMITH, individually; and DOES I-X, inclusive;  
27 and ROES I-X, inclusive,

28 Defendants.

CASE NO.: 2:15-cv-01572-APG-DJA

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE  
STIPULATED DISMISSAL  
(2<sup>nd</sup> Request)**

21 IT IS HEREBY STIPULATED by and between Victor Perez, as Special Administrator of  
22 the Estate of Carlos Perez, deceased, Victor Perez as Guardian Ad Litem for S.E.P. and A.I.P., by  
23 and through his counsel, Paola M. Armeni, Esq., and Gia N. Marina, Esq., of the law firm of Clark  
24 Hill, Defendant Raynaldo Ramos, by and through his counsel, Robert W. Freeman, Jr. Esq., of the  
25 law firm of Lewis Brisbois Bisgaard & Smith, LLP, Defendants, State of Nevada ex rel Nevada  
26 Department of Corrections, James Greg Cox, Timothy Filson, Dwight W. Neven and Ronald  
27 Oliver, by and through their counsel, Kiel Ireland, Esq. of the Attorney General's Office,  
28 Defendant Isaiah Smith, by and through his counsel of record Jeffrey F. Barr, Esq. and Alina Shell,  
Esq. of the law firm of Armstrong Teasdale, and Defendant

1 Jeff Castro, by and through his counsel, Craig Anderson, Esq., of the law firm of Marquis Aurbach,  
2 that the deadline to file the Stipulated Dismissal currently September 29, 2023, be continued for  
3 an additional sixty (60) days, up to and including November 28, 2023.

4 The parties request the extension of the deadline for several reasons: (1) the probate court  
5 is not set to approve the settlement of the estate funds until October 6, 2023; (2) the settlement is  
6 not set to be approved by the Board of Examiners until October 10, 2023; and (3) distribution of  
7 the settlement proceeds will not take place until several weeks after approval by the Board. Thus,  
8 the additional time is needed to ensure the conditions of the settlement are met.

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1 This request for extension is made in good faith and not for the purposes of delay.

2 APPROVED AS TO FORM AND CONTENT.

3 Respectfully submitted this 26<sup>th</sup> day of September 2023.

4 **CLARK HILL, PLLC**  
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14 **ARMSTRONG TEASDALE**  
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*Attorneys for Defendants, State of Nevada,  
Dwight W. Neven, James Greg Cox  
Ronald Oliver, Timothy Filson*

22 **ORDER**

23 **IT IS SO ORDERED:**

24 DATED: 9/27/2023

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27 UNITED STATES MAGISTRATE JUDGE  
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