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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 FOR  
DISMISSAL WITH PREJUDICE**

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

1 of Marquis Aurbach, hereby agree and stipulate to the dismissal of Plaintiffs' claims against  
2 Defendants with prejudice. The parties have met the conditions of settlement and each party will  
3 bear their own attorney's fees and cost.

4 APPROVED AS TO FORM AND CONTENT.

5 Respectfully submitted this 27<sup>th</sup> day of November 2023.

6 **CLARK HILL, PLLC**

*/s/ Paola M. Armeni, Esq.*

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**LEWIS BRISBOIS BISGAARD &  
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*Dwight W. Neven, James Greg Cox*

*Ronald Oliver, Timothy Filson*

22 **ORDER**

23 **IT IS SO ORDERED:**

24 DATED: November 28, 2023

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26 

27 **ANDREW P. GORDON**  
28 **UNITED STATES DISTRICT JUDGE**