

FILED
April 17, 2025
State of Nevada
E.M.R.B.
10:47 a.m.

Jason D. Guinasso, Esq. (SBN# 8478)
GUINASSO LAW, LTD.
5371 Kietzke Lane
Reno, Nevada 89511
Telephone: (775) 993-8899
Facsimile: (775) 201-0530
Jason@guinassolaw.com
Attorney for Complainant

STATE OF NEVADA

GOVERNMENT EMPLOYEE-MANAGEMENT RELATIONS BOARD

SHELIA LEIJON,

Case Number: 2024-022

Complainant,

vs.

INCLINE VILLAGE GENERAL
IMPROVEMENT DISTRICT,

Respondent.

STIPULATION TO DISMISS WITHOUT PREJUDICE

COMPLAINANT SHELIA LEIJON, by and through her undersigned counsel of record JASON D. GUINASSO, ESQ. of GUINASSO LAW, LTD., and RESPONDENT INCLINE VILLAGE GENERAL IMPROVEMENT DISTRICT, by and through its undersigned counsel of record NICK D. CROSBY, ESQ. of MARQUIS AURBACH, hereby files this Stipulation to Dismiss Without Prejudice.

The parties to the above-entitled proceeding hereby stipulate that the complaint filed in this matter should be dismissed without prejudice. The parties have resolved this matter through mutual agreement and request that the Employee Management Relations Board approve this Stipulation of Dismissal Without Prejudice.

Currently, a mutually agreeable settlement agreement has been prepared by the parties. The Agreement has been executed by Ms. Leijon. Respondent must comply with Nevada Open Meeting Law notice requirements, and the settlement agreement and the execution of the agreement needs to be formally approved at a publicly noticed meeting. For this reason, the

1 parties are requesting that the matter be dismissed without prejudice. Upon final approval after
2 the publicly noticed meeting, once Respondent has approval to sign the settlement agreement,
3 within 45 days of the date of this stipulation, the parties will submit a Stipulation to Dismiss
4 with Prejudice.

5 The parties may submit a dismissal with prejudice after the 45-day period so long as
6 such dismissal is stipulated to by the parties. If the parties do not seek a dismissal with
7 prejudice within the 45-day period, the matter shall be maintained as dismissed without
8 prejudice.

9 IT IS SO STIPULATED this 16th day of April, 2025.

10 MARQUIS AURBACH

GUINASSO LAW, LTD.

11
12 By: s/Nick D. Crosby

By: s/Jason D. Guinasso, Esq.

13 Nick D. Crosby, Esq.
14 Nevada Bar No. 8996
15 10001 Park Run Drive
16 Las Vegas, Nevada 89145
Attorney for Respondent

Jason D. Guinasso, Esq.
Nevada Bar No. 8478
5371 Kietzke Lane
Reno, Nevada 89511
Attorneys for Complainant

17 **ORDER**

18 Based upon the foregoing Stipulation of Dismissal, and the Employee Management
19 Relations Board being fully advised, now, therefore,

20 IT IS HEREBY ORDERED that the complaint in the above-entitled proceeding is
21 dismissed without prejudice.

22 The parties have 45 days from the date of this stipulation and order to submit a
23 stipulation for dismissal with prejudice once the settlement agreement is signed by Respondent
24 following any necessary publicly noticed meeting.

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The parties may submit a dismissal with prejudice after the 45-day period so long as such dismissal is stipulated to by the parties. If the parties do not seek a dismissal with prejudice within the 45-day period, the matter shall be maintained as dismissed without prejudice.

IT IS SO ORDERED.

Dated this _____ of _____ 2025.

GOVERNMENT EMPLOYEE-
MANAGEMENT RELATIONS BOARD

Michael J. Smith
Presiding Officer