

FILED  
June 5, 2025  
State of Nevada  
E.M.R.B.  
2:24 p.m.

LAW OFFICE OF DANIEL MARKS  
DANIEL MARKS, ESQ.  
Nevada State Bar No. 002003  
[office@danielmarks.net](mailto:office@danielmarks.net)  
ADAM LEVINE, ESQ.  
Nevada State Bar No. 004673  
[alevine@danielmarks.net](mailto:alevine@danielmarks.net)  
610 South Ninth Street  
Las Vegas, Nevada 89101  
(702) 386-0536: FAX (702) 386-6812  
*Attorneys for Petitioner/Employee*

STATE OF NEVADA  
GOVERNMENT EMPLOYEE-MANAGEMENT  
RELATIONS BOARD

AMERICAN FEDERATION OF STATE,  
COUNTY AND MUNICIPAL EMPLOYEES-  
LOCAL 4041, and SHARI KASEBAUM

Case No.: 2020-020

Complainants,

v.

STATE OF NEVADA, *ex rel* its DEPARTMENT  
OF CORRECTIONS

Respondents.

**STIPULATION AND ORDER TO DISMISS**

Complainants AMERICAN FEDERATION OF STATE, COUNTY AND MUNICIPAL  
EMPLOYEES-LOCAL 4041, and SHARI KASEBAUM by and through their undersigned counsel  
Adam Levine, Esq. of the Law Office of Daniel Marks and Respondent STATE OF NEVADA, *ex rel* its  
DEPARTMENT OF CORRECTIONS by and through its attorneys Aaron Ford, Attorney General and  
Bruce C. Young, Senior Deputy Attorney General of the Office of the Nevada Attorney General, hereby  
stipulate to the dismissal of the above-captioned matter with prejudice and with each party to bear their  
own fees and costs.

1 IT IS FURTHER STIPULATED AND AGREED that the parties hereto stipulate to vacate any,  
2 and all, prior orders filed herein.

3 LAW OFFICE OF DANIEL MARKS

OFFICE OF THE NEVADA ATTORNEY  
GENERAL

4  
5 /s/Adam Levine, Esq.  
DANIEL MARKS, ESQ.  
6 Nevada State Bar No. 002003  
office@danielmarks.net  
7 ADAM LEVINE, ESQ.  
Nevada State Bar No. 004673  
8 alevine@danielmarks.net  
610 South Ninth Street  
9 Las Vegas, Nevada 89101  
(702) 386-0536; FAX (702) 386-6812  
10 *Attorneys for Complainants American*  
*Federation of State, County and Municipal*  
11 *Employees-Local 4041, and Shari Kasebaum*

/s/Bruce C. Young, Esq.  
Aaron Ford, Attorney General  
Bruce C. Young, Sr. Deputy Attorney General  
Nevada State Bar No. 5560  
1 State of Nevada Way, Suite 100  
Las Vegas, Nevada 89119  
Tel: (702) 486-3782  
bcyoung@ag.nv.gov  
*Attorneys for Respondent/Employer State of*  
*Nevada, ex rel its Department of Corrections*

12  
13 **IT IS SO ORDERED.**

14  
15  
16 Marisu Romualdez Abellar, Commissioner  
Employee-Management Relations Board

17 Respectfully submitted by:

18 LAW OFFICE OF DANIEL MARKS

19 /s/Adam Levine, Esq.  
DANIEL MARKS, ESQ.  
20 Nevada State Bar No. 002003  
ADAM LEVINE, ESQ.  
21 Nevada State Bar No. 004673  
alevine@danielmarks.net  
22 610 South Ninth Street  
Las Vegas, Nevada 89101  
23 *Attorneys for Plaintiff*  
24

**Joi Harper**

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**From:** Bruce C. Young <bcyoung@ag.nv.gov>  
**Sent:** Thursday, June 5, 2025 1:01 PM  
**To:** Joi Harper; Adam Levine  
**Cc:** Anela P. Kaheaku  
**Subject:** RE: Kassebaum v. NDOC Appeal #2108512-GP and Kassebaum v. State of Nevada, ex rel its Department of Corrections EMRB case no. 2020-020

Joi: I have reviewed the two proposed stipulations and you have my permission to submit them with my electronic signatures. Thank you

Bruce

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**From:** Joi Harper <JHarper@danielmarks.net>  
**Sent:** Thursday, June 5, 2025 11:34 AM  
**To:** Bruce C. Young <bcyoung@ag.nv.gov>; Adam Levine <ALevine@danielmarks.net>  
**Cc:** Anela P. Kaheaku <AKaheaku@ag.nv.gov>  
**Subject:** RE: Kassebaum v. NDOC Appeal #2108512-GP and Kassebaum v. State of Nevada, ex rel its Department of Corrections EMRB case no. 2020-020

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good morning Bruce,

Attached are both Stipulations and Orders to Dismiss of the Kassebaum matters. Please review the both of the documents and let me know if you have any changes. If there are no changes please sign each where indicated or give me permission to e-sign them and I will submit them both accordingly.

Thank you,

Joi E. Harper, Paralegal  
LAW OFFICE OF DANIEL MARKS  
610 S. Ninth Street  
Las Vegas, Nevada 89101  
[Jharper@danielmarks.net](mailto:Jharper@danielmarks.net)

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**From:** Bruce C. Young <bcyoung@ag.nv.gov>  
**Sent:** Tuesday, June 3, 2025 10:25 AM

**To:** Adam Levine <[ALevine@danielmarks.net](mailto:ALevine@danielmarks.net)>

**Cc:** Joi Harper <[JHarper@danielmarks.net](mailto:JHarper@danielmarks.net)>; Anela P. Kaheaku <[AKaheaku@ag.nv.gov](mailto:AKaheaku@ag.nv.gov)>

**Subject:** FW: Kassebaum v. NDOC Appeal #2108512-GP

Adam: Please find attached the fully executed settlement agreement for your files.

Bruce