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6

7 **STATE OF NEVADA**

8 **GOVERNMENT EMPLOYEE-MANAGEMENT RELATIONS BOARD**

9 *IN RE:*

Case No. 2024-029

10 CLARK COUNTY EDUCATION
11 ASSOCIATION'S PETITION FOR
DECLARATORY
12 ORDER

Consolidated with

13 CLARK COUNTY SCHOOL DISTRICT,

Case No. 2023-020

14 Petitioner,

15 vs.

[PROPOSED] STIPULATION

16 CLARK COUNTY EDUCATION
17 ASSOCIATION,

18 Respondent.

19 The Clark County Education Association ("CCEA") and Clark County School
20 District ("CCSD"), by and through their respective counsel of record, pursuant to
21 Chapter 288 of the NAC and after a conference held on Tuesday, November 26, 2024,
22 among the parties and Commissioner Bruce Snyder, here stipulate as follows:

23 1. The parties suggest that the contemplated hearing in the consolidated
24 cases, tentatively considered for the week of January 27, 2025, be rescheduled for the
25 weeks of March 24 or March 31, 2025, at the convenience of the Board and depending
26 upon the resolution of CCEA's pending motion regarding bifurcation of the
27 proceedings.
28

1 2. The deadline for the parties to file non-discovery motions will be
2 **December 23, 2024**, with the responses to such motions due **January 6, 2025**, and
3 the respective optional replies to such motions due **January 20, 2025**.¹

4 This briefing schedule provides the Board time to resolve such motions by the
5 end of January of 2025, well in advance of any merits hearings.

6 Any such motions filed before the December 23, 2024, deadline will be subject
7 to the normal briefing calendar.

8 Although the parties stipulate to this briefing schedule, they reserve all rights
9 to oppose for any reason or argue that any forthcoming non-discovery motion is
10 improper or not contemplated by the applicable rules of procedure and practice before
11 the Board.

12 3. Pursuant to NAC 288.253(1), the parties' respective pre-hearing
13 statements will be due for filing ten (10) days after the Board's entry of the order
14 resolving the last motion filed on or before the deadline established in Section 2 above.

15 4. Regarding the subpoena duces tecum issued by the Board on behalf of
16 CCEA on November 19, 2024, the parties agree to treat that subpoena as having been
17 served on the date the Board officially sets a hearing date in this matter (presently
18 anticipated to take place on December 9, 2024).

19 CCSD will itself submit a subpoena duces tecum to the Board for issuance to
20 CCEA between December 9, 2024 and December 12, 2024, presuming the Board
21 schedules a hearing date at its December 9, 2024, meeting.

22 5. The parties agree that their responses to subpoenas issued and served
23 between December 9 and December 12, 2024, will be due on or before **December 31,**
24 **2024**.

25
26 ¹ The parties note that this deadline falls on the Martin Luther King Jr.
27 Holiday. However, any response must be filed before the Board posts its agenda for
28 its January 27, 2025, meeting.

1 The parties further agree that they will not move to quash subpoenas, but
2 instead will submit objections, if any. The party that served the subpoena will have
3 the burden to file a motion to compel responses, as necessary and if required.

4 The parties agree that these subpoena deadlines do not preclude additional
5 subpoenas by either party, and that the parties will meet and confer in good faith to
6 avoid delay should any subsequent subpoenas be considered necessary.

7 6. All motions to compel responses to subpoenas issued and served between
8 December 9 and December 12, 2024, will be filed on or before **January 8, 2025**.
9 Responses to a motion to compel will be filed on or **before January 17, 2025**. The
10 parties agree to waive optional reply briefing on pending motions to compel responses
11 to a subpoena, and instead will appear and argue any reply at the Board's meeting
12 on the week of January 27, 2025, subject to the Board's discretion.

13
14 **IT IS SO STIPULATED.**

15 Dated this 27th day of November, 2024.

Dated this 27th day of November, 2024.

16 **CLARK COUNTY SCHOOL
17 DISTRICT**

**CLARK COUNTY EDUCATION
ASSOCIATION**

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