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FILED
September 14, 2026
State of Nevada
E.M.R.B.
6:07 p.m.

24 STATE OF NEVADA

25 GOVERNMENT EMPLOYEE-MANAGEMENT RELATIONS BOARD

26 FRATERNAL ORDER OF POLICE
27 NEVADA C.O. LODGE 21,

28 Complainant,

vs.

EXECUTIVE DEPARTMENT OF THE
STATE OF NEVADA¹,

Respondent.

Case No. 2026-014

STIPULATION OF PARTIES TO
REQUEST A STAY

Respondent, Executive Department of the State of Nevada, by and through its counsel, Aaron Ford, Attorney General of the State of Nevada, Josh Reid, Special Counsel – Labor Relations, and Steven O. Sorensen, Deputy Attorney General; Complainant, Fraternal Order of Police Nevada C.O. Lodge 21, by and through its counsel, Adam Levine, hereby submit their Joint Stipulation to Request a Stay in the above referenced matter.

¹ The Caption has been adjusted to remove “the Department of Human Services” pursuant to NAC 288.030(4).

1 Pursuant to the collective bargaining agreement ("CBA") between the parties, a
2 grievance was filed by FOP on the matters relating to Case No. 2026-014. The parties are
3 proceeding to binding arbitration under the CBA, which will be held later this year.
4 Accordingly, the parties jointly request that Case No. 2026-014 be stayed under the Limited
5 Deferral Doctrine until the arbitrator makes their final written decision in the arbitration.

6 WHEREFORE, the parties hereby request an Order staying this matter until the
7 final arbitration decision is made by the arbitrator resolving the related grievance in the
8 above referenced matter.

9
10 DATED this 14th day of September 2026.

11 AARON FORD
12 Attorney General

13 By: /s/ Josh Reid
14 JOSH REID (Bar No. 7497)
15 Special Counsel – Labor Relations
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CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General,
and that on this 14th day of September 2026, I served a true and correct copy of the foregoing
STIPULATION OF PARTIES TO REQUEST A STAY by electronic service, addressed to:

Government Employee-Management Relations Board, emrb@emrb.nv.gov

Marisu Romualdez Abellar, Commissioner, mabellar@emrb.nv.gov

Adam Levine, Esq., alevine@danielmarks.net

Paul Lunkwitz, lunkwitzfop21@yahoo.com

/s/ Josh Reid

Josh Reid, an employee of the Office of the
Nevada Attorney General