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7 *Attorneys for Petitioner*

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10 REPUBLICAN NATIONAL COMMITTEE,

Case No.: A-22-858609-W

11 Petitioner,

Dept. No.: XVI

12 v.

13 CLARK COUNTY; CLARK COUNTY
14 ELECTION DEPARTMENT; JOE P.
15 GLORIA, in his Official Capacity as the
16 Clark County Registrar of Voters,

STIPULATION AND ORDER

17 Respondents.

18 COMES NOW Petitioner National Republican Committee ("RNC"), by and through its
19 undersigned counsel, and Respondents Clark County, Clark County Election Department, and
20 Joe P. Gloria (together "Respondents"), by and through their undersigned counsel, and stipulate
21 and agree as follows:

22 1. On September 20, 2022, RNC filed its Petition for Writ of Mandamus and
23 Application Compelling Disclosure of Public Records Pursuant to NRS 239.011 ("the Petition").
24 Invoking the Nevada Public Records Act ("NPRA"), the Petition seeks, among other things, an
25 order and writ of mandamus directing Respondents to disclose the names and party affiliation of
26 Clark County's poll workers for the past primary election and upcoming 2022 general election.
27 See NRS 293.217(1) ("The registered voters appointed as election board officers for any polling
28 place must not all be of the same political party.")

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1 2. On September 21, 2022, pursuant to a separate public records request from a
2 different law firm, Respondents provided a bipartisan breakdown of poll workers that worked the
3 2022 primary election. The bipartisan breakdown did not include the names of any poll workers.

4 3. Respondents filed their Opposition to the Petition on September 27, 2022.

5 4. The Court set an expedited hearing on the Petition for October 3, 2022 at 2:00 p.m.
6 pursuant to NRS 239.011(2).

7 5. The parties have reached an agreement to resolve their dispute about Respondents'
8 disclosure of information about the partisan affiliation of poll workers in Clark County.

9 6. Respondents agree to provide the RNC with the scheduled roster for all early
10 voting and general election polling locations in Clark County, including manual signature
11 verification and counting board teams. The roster will include the political party affiliation and
12 job title/task assignment for all poll workers at each polling location. RNC agrees to not seek the
13 names of the poll workers. Respondents agree to provide, at reasonable intervals to be agreed
14 upon in good faith by the parties, updated roster information which will indicate any partisan
15 staffing changes.

16 7. In addition to the information provided in Paragraph 6 above, Respondents also
17 agree within 30 days after the canvass of the 2022 General Election or the canvass of any recount
18 to provide updated aggregate information about the political affiliation of all poll workers hired to
19 work the 2022 general election cycle in the same or similar form as provided on September 21,
20 2022.

21 8. Any disputes or disagreements between the parties related to the issues raised in
22 the Petition, this Stipulation, and/or disclosure of the information and documents pursuant to this
23 Stipulation and Order may be resolved by the Court on motion practice following good faith meet
24 and confer efforts by the parties.

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9. The parties agree to STAY these proceedings until December 23, 2022 after which the RNC agrees to dismiss the proceeding with a waiver of its entitlement to attorneys' fees and costs and other civil penalties provided that there are no disputes or motions then pending with the Court.

DATED this 5th day of October, 2022.

DATED this 5th day of October, 2022.

PISANELLI BICE PLLC

CLARK COUNTY DISTRICT ATTORNEY
CIVIL DIVISION

By: /s/ Jordan T. Smith
Jordan T. Smith, Esq., #12097
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101

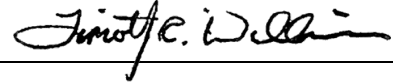
By: /s/ Lisa Logsdon
Lisa Logsdon, Esq.
500 S. Grand Central Parkway, #5075
Las Vegas, Nevada 89106

Attorneys for Republican National Committee

*Attorneys for Clark County, Clark County
Election Department, and Joe P. Gloria*

IT IS SO ORDERED.

Dated this 5th day of October, 2022



9A9 388 FB46 8C3C
Timothy C. Williams
District Court Judge

JM

Kimberly Peets

From: Lisa Logsdon <Lisa.Logsdon@clarkcountyda.com>
Sent: Wednesday, October 05, 2022 12:00 PM
To: Jordan T. Smith
Cc: Kimberly Peets
Subject: RE: RNC v. Clark County - Settlement Communication

CAUTION: This message is from an EXTERNAL SENDER.
Mr. Smith,

You may affix my e-signature and submit to the Court.

Thank you,

Lisa Logsdon
County Counsel
Clark County District Attorney – Civil Division
Telephone: (702) 455-4761
Email: Lisa.Logsdon@ClarkCountyDA.com

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From: Jordan T. Smith <JTS@pisanellibice.com>
Sent: Tuesday, October 4, 2022 9:21 PM
To: Lisa Logsdon <Lisa.Logsdon@clarkcountyda.com>
Cc: Kimberly Peets <kap@pisanellibice.com>
Subject: RE: RNC v. Clark County - Settlement Communication

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Ms. Logsdon,

I have attached the final version of the stipulation. Please confirm that we may add your e-signature and submit.

Thank you,

Jordan T. Smith
Partner
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Las Vegas, Nevada 89101
tel 702.214.2100
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1 **CSERV**

2
3 DISTRICT COURT
4 CLARK COUNTY, NEVADA

5
6 Republican National Committee, CASE NO: A-22-858609-W
7 Plaintiff(s)
8 vs. DEPT. NO. Department 16
9 Clark County, Defendant(s)

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District
13 Court. The foregoing Stipulation and Order was served via the court's electronic eFile system
14 to all recipients registered for e-Service on the above entitled case as listed below:

15 Service Date: 10/5/2022

16 Bradley Schrager bschrager@wrslawyers.com
17 Dannielle Fresquez dfresquez@wrslawyers.com
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