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28 Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

22 G.M., a minor, by and through AUDREY  
23 GUARDANAPO and SHAUN  
24 GUARDANAPO,

Plaintiff,

v.

26 WASHOE COUNTY SCHOOL DISTRICT,

Defendant.

Case No.: 3:18-cv-00172

**JOINT STIPULATION FOR ENTRY OF  
STIPULATED JUDGMENT AND  
[PROPOSED] STIPULATED JUDGMENT**

Judge: Hon. Robert C. Jones  
Action Filed: April 24, 2018

1 Plaintiff G.M., by and through Audrey Guardanapo and Shaun Guardanapo as his next  
2 friends, and Defendant Washoe County School District, hereby inform the Court that they have  
3 reached a settlement in this action.

4 Defendant has formally revised the Washoe County School District Parent/Student  
5 Handbook, Kendyl Depoali Middle School dress code, and all other site-specific dress codes to  
6 remove the prohibition against clothes containing “anything that promotes weapons.” Defendant  
7 has communicated this change in policy to all affected administrators, school site personnel, sites,  
8 campuses, parents, and students.

9 Defendant acknowledges that its application of the Washoe County School District dress  
10 code and the Kendyl Depoali Middle School dress code to Plaintiff G.M. violated his rights  
11 secured by the First Amendment to the United States Constitution.

12 Defendant will pay \$25,000 for Plaintiff’s attorney’s fees for full and complete resolution  
13 of the Complaint. Plaintiff may not bring any additional motions for damages, fees, and costs, as  
14 well as any claims associated with the facts and circumstances alleged in his Complaint. Plaintiff  
15 waives any right to bring any further claims associated with the facts and circumstances alleged in  
16 his Complaint against Kendyl Depoali Middle School and Joye Ancina, in her official capacity as  
17 Principal of Kendyl Depoali Middle School.

18 Accordingly, the parties jointly request that the Court enter the attached Proposed  
19 Stipulated Judgment being lodged simultaneously herewith.

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Dated: July 6, 2018

THE O'MARA LAW FIRM, P.C.

By /s David C. O'Mara

DAVID C. O'MARA  
Attorneys for Plaintiff

Dated: July 6, 2018

By /s Neil A. Rombardo

NEIL A. ROMBARDO  
Chief General Counsel,  
Washoe County School District  
Attorneys for Defendant

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

G.M., a minor, by and through AUDREY  
GUARDANAPO and SHAUN  
GUARDANAPO,

Plaintiff,

v.

WASHOE COUNTY SCHOOL DISTRICT,

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Case No.: 3:18-cv-00172

**[PROPOSED] STIPULATED JUDGMENT**

Judge: Hon. Robert C. Jones  
Action Filed: April 24, 2018

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Based upon the Joint Stipulation for Entry of Stipulated Judgment by and between Plaintiff G.M., by and through Audrey Guardanapo and Shaun Guardanapo as his next friends, and Defendant Washoe County School District, it is hereby ORDERED that the Joint Stipulation for Entry of Stipulated Judgment is GRANTED.

Accordingly, IT IS HEREBY ORDERED, ADJUDGED, and DECREED that:

Defendant Washoe County School District's application of the Washoe County School District dress code and the Kendyl Depoali Middle School dress code to Plaintiff G.M. violated his rights secured by the First Amendment to the United States Constitution.

The Parties have represented that they have resolved all damages, costs and fees associated with the foregoing judgment, with Defendant paying Plaintiff \$25,000 in attorney's fees. This case is therefore closed.

Dated: \_\_\_\_\_

\_\_\_\_\_

UNITED STATES DISTRICT JUDGE