

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEBRASKA**

**HANNAH SABATA, et al.,**

**Plaintiffs,**

**v.**

**NEBRASKA DEPARTMENT OF  
CORRECTIONAL SERVICES, et al.,**

**Defendants.**

**Case No. 4:17-cv-03107-BCB-MDN**

**CLASS ACTION**

**JOINT STIPULATION OF DISMISSAL  
WITHOUT PREJUDICE**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs Hannah Sabata, Dylan Cardeilhac, James Curtright, Jason Galle, Richard Griswold, R.P., Isaac Reeves, and Michael Gunther (“Plaintiffs”) and Defendants Nebraska Department of Correctional Services, Scott Frakes, Harbans Deol, and Nebraska Board of Parole (“Defendants”), hereby stipulate and agree that the above existing action of each Plaintiff against Defendants is DISMISSED WITHOUT PREJUDICE. Each Party shall bear his, her, and its own costs and expenses, including attorneys’ fees.

DATED: November 30, 2020

**ACLU NATIONAL PRISON PROJECT  
ACLU OF NEBRASKA  
DLA PIPER LLP (US)  
NATIONAL ASSOCIATION OF THE DEAF  
NEBRASKA APPLESEED  
ROSEN BIEN GALVAN & GRUNFELD LLP**

By: *s/ Robert McEwen*

Robert E. McEwen, #24817  
NEBRASKA APPLESEED CENTER  
FOR LAW IN THE PUBLIC INTEREST  
941 "O" St., Ste. 920  
Lincoln, Nebraska 68508  
Telephone: (402) 438-8853  
Facsimile: (402) 438-0263  
Emails: [rmcewen@neappleseed.org](mailto:rmcewen@neappleseed.org)

*Attorneys for Plaintiffs*

**NEBRASKA DEPARTMENT OF  
CORRECTIONAL SERVICES,  
SCOTT FRAKES, HARBANS DEOL,  
and NEBRASKA BOARD OF PAROLE,  
Defendants.**

DOUGLAS J. PETERSON  
Attorney General of Nebraska

*s/ Ryan S. Post*  
RYAN S. POST, #24714  
Assistant Attorney General

OFFICE OF THE ATTORNEY GENERAL  
2115 State Capitol  
Lincoln, Nebraska 68509  
(402) 471-2682  
[Ryan.Post@nebraska.gov](mailto:Ryan.Post@nebraska.gov)

*Attorney for Defendants*