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OCT 23 2009
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1 **COMP**
2 CORY J. HILTON, ESQ.
3 Nevada Bar No. 4290
4 **HILTON WILLIAMS & ASSOCIATES**
5 5545 Mountain Vista St., Ste. F
6 Las Vegas, Nevada 89120
7 *Attorneys for Plaintiff*

8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 DALENE HICKS, JENNY CALDERON,
11 JAMES PERKINS, TIFFANY TURPIN
12 REPRESENTING CONCERNED
13 PARENTS OF GREEN VALLEY HIGH
14 SCHOOL STUDENTS, and other concerned
15 parents and members of the community,

16 Plaintiffs,

17 vs.

18 CLARK COUNTY SCHOOL DISTRICT;
19 and DOES I through V, and ROE
20 CORPORATIONS VI through X, inclusive,

21 Defendants.

Case No. **A-09-602311-C**
Dept. No. ~~XXXX~~

COMPLAINT

EXEMPT FROM ARBITRATION
(Declaratory Relief, Injunctive Relief)

A-09-602311-C
480815



COMPLAINT

Plaintiffs, DALENE HICKS, JENNY CALDERON, JAMES PERKINS
REPRESENTING CONCERNED PARENTS OF GREEN VALLEY HIGH SCHOOL
STUDENTS, and other concerned parents and members of the community, hereinafter
"PLAINTIFFS", by and through their attorneys of record, Cory J. Hilton. Esq. , and hereby
complains and alleges as follows:

I. GENERAL ALLEGATIONS

- 1 At all times mentioned herein, Plaintiffs were and are residents of the State of Nevada,
25 County of Clark.
- 26 2. Plaintiff Dalene Hicks is a resident of Clark County, Nevada and is a parent of a student
27 at Green Valley High School.
- 28 3. Plaintiff Jenny Calderon is a resident of Clark County, Nevada and is a parent of a

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student at Green Valley High School.

4. Plaintiff James Perkins is a resident of Clark County, Nevada and is a parent of a student at Green Valley High School.

5. Plaintiff Tiffany Turpin is a resident of Clark County, Nevada and is a parent of a student at Green Valley High School.

6. Plaintiffs are informed and believe that Defendant, Clark County School District (herein "CCSD"), was and is at all times herein a Nevada School District.

7. Pursuant to Nevada Rules of Civil Procedure, Rule 10(a) and Nurenberger Hercules-Werke GmbH V. Virostek, 107 Nev. 873, 822 P.2d 1100 (1991), the true names and capacities, whether individual, corporate, associate or otherwise, of Defendants named herein as DOES I through X and ROE CORPORATIONS XI through XX, are unknown at the present time; however, it is alleged and upon information and belief, that these Defendants were involved in the initiation, approval, support, or execution of the wrongful acts upon which this litigation is premised, or of similar actions directed against Plaintiff about which he is presently unaware. As the specific identify of these parties are revealed through the course of discovery, the Plaintiff will ask leave of the Court to amend the Complaint so that the DOE and ROE appellations will be replaced to identify these parties by their true names and capacities.

II.BACKGROUND

8. That the Productions known as the LARAMIE PROJECT and RENT have been selected for performance at Green Valley High School and it is well known that both are rated above PG or have content that is not suitable for students, and therefore the performance of either or both violate Defendant's own policy.

9. That regulations have been written that govern all schools within the Clark County School District.

10. That regulations have been written to protect the students of Green Valley High School.

11. That laws have been made, written and enumerated to protect the interests of the

- 1 students of Green Valley High School.
- 2 12. That laws, policies and procedures have been made, written and enumerated that direct
3 defendant and its subordinates to conduct themselves in a certain manner;
- 4 13. That the Defendant has breached its obligation to students of Green Valley High School;
- 5 14. That laws, policies and procedures have been made, written and enumerated that define
6 curriculum, where such definition includes drama and musical productions in an
7 educational setting;
- 8 15. That Defendant, through its subordinate, Green Valley High School has scheduled the
9 productions of the LARAMIE PROJECT and the musical RENT to be performed in the
10 Theater located on the campus of the school
- 11 16. That Defendant has established its own regulations and policies that regulate what
12 content is acceptable as curriculum and defines what is acceptable as content in a
13 production such as a play or musical.

14 **II. FIRST CLAIM FOR RELIEF**
15 (Declaratory Relief)

- 16 17. Plaintiffs repeats and reallege Paragraphs 1 through 16 and incorporates the same by
17 reference herein.
- 18 18. There exists a justiciable controversy between Plaintiffs and Defendant regarding
19 Plaintiffs' rights as defined by existing law.
- 20 19. It has become apparent to Plaintiffs, that Plaintiffs' rights to have their children view
21 appropriate curriculum has been, or will be compromised or breached by Defendant, and
22 therefore their rights are adverse to Defendant, and based on Defendant's own conduct
23 has not and will not grant Plaintiffs' relief absent judicial intervention.
- 24 20. Plaintiffs have established legally protectable interests and rights in the proper
25 enforcement of the Defendant's policies and procedures and that a declaration of the
26 enforceability of said rights should be granted in favor of Plaintiff.
- 27 21. A judicial determination of the interpretation of Plaintiffs' rights is necessary and
28 appropriate at this time.

1 22. As a direct and proximate result of Defendant's conduct, Plaintiffs were forced to obtain
2 the services of an attorney to prosecute said action and are entitled to an award of their
3 attorney's fees and costs incurred in the prosecution of this action.
4

5 **III. SECOND CLAIM FOR RELIEF**

6 **PRELIMINARY INJUNCTION**

7 23. Plaintiffs repeat and reallege Paragraphs 1 through 22 and incorporates the same by
8 reference herein.

9 24. By refusing to acknowledge the rights of Plaintiffs, irreparable harm will occur if the
10 productions are not cancelled.

11 25. The productions are scheduled to commence on November 16, 2009.

12 26. Granting the preliminary injunction is necessary to prevent Defendant from violating the
13 policies and procedures and to preserve the status quo pending a final decision on the
14 merits.

15 27. Plaintiffs request this Court issue a preliminary injunction to stop the production and
16 allow this matter to be heard on its merits.

17 28. Plaintiffs have been forced to retain a lawyer and therefore are entitled to reasonable
18 attorneys fees and costs.

19 **WHEREFORE**, Plaintiffs, expressly reserve their right to amend this Complaint, at
20 the time of the trial of the action herein, to include all items of damage not yet ascertained,
21 demands judgment against Defendants, and each of them, as follows:

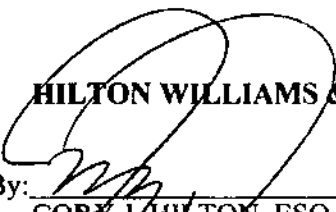
- 22 1. For an Order that enjoins the practice and production of the play known as THE
23 LARAMIE PROJECT and the musical known as RENT;
 - 24 2. For an Order that declares and outlines the violation(s) by Defendant of its own
25 policies and regulations;
 - 26 3. Attorney's fees and costs incurred herein;
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4. For such other and further relief as the Court deems just and proper in this matter.

DATED this 23 day of October, 2009.

HILTON WILLIAMS & ASSOCIATES

By: 
CORY J. HILTON, ESQ.
Nevada Bar No. 4290
5545 Mountain Vista St., Ste. F
Las Vegas, Nevada 89120
Attorneys for Plaintiff

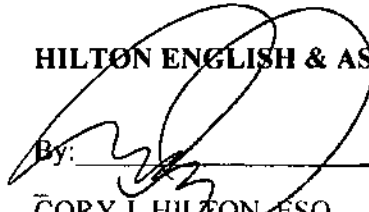
AFFIRMATION PURSUANT TO NRS 239B.030

The undersigned does hereby affirm that the preceding Complaint filed in District Court.

x Does not contain the social security number of any person.

DATED this 23 day of October, 2009.

HILTON ENGLISH & ASSOCIATES

By: 
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Attorneys for Plaintiff