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Attorneys for Plaintiff Ana Patricia Fernandez

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ANA PATRICIA FERNANDEZ, an
individual,

Plaintiff,

v.

LOS ANGELES COUNTY, et al.,
Defendants.

Case No.: 2:20-cv-09876 DMG (PDx)

**STIPULATION FOR LEAVE TO
WITHDRAW PENDING MOTION
FOR SUMMARY JUDGMENT, FOR
LEAVE TO FILE A CORRECTED
MOTION, AND FOR
CONTINUANCE OF CURRENT
DISPOSITIVE MOTION
DEADLINES**

WHEREAS:

1. Defendants filed their motion for summary judgment on March 6, 2024;

2. While it was a single noticed motion, Defendants included two memoranda of points and authorities, one that is 7,518 words and another that is 5,491 words, and thus significantly exceeded the Local Rules' 7,000-word limit without leave of this Court;

3. Plaintiff's counsel noticed this error on March 12, 2024, in preparing the opposition briefing, and contacted Defendants' counsel;

1 4. The current noticed hearing date of April 5, 2024, left Plaintiff only
2 until March 15, 2024, to oppose both memoranda, just a little over a week from the
3 time she received the motion and supporting documents;

4 5. Defendants desire to correct their motion and to have an increased
5 word limit to sufficiently cover all of the relevant subject matter;

6 6. Per this Court's November 13, 2023, order (Dkt. No. 69), the current
7 dispositive motion filing cut-off date was March 8, 2024, and the current hearing
8 cut-off date is April 12, 2024;

9 7. If this Court approves of continuing those dates, Plaintiff agrees to
10 allow Defendants time to correct their non-compliant motion by withdrawing it and
11 re-filing it with a new hearing date, provided that Plaintiff has at least 21 days to
12 prepare her opposition, and provided that any increased word limit for Defendants'
13 motion also applies to her opposition;

14 8. Should this Court refuse to grant this stipulation, Plaintiff asks that she
15 be given until March 29, 2024, to oppose the current motion, as well as an
16 increased word limit of up to 13,000 words to match the combined total of 13,009
17 words of the filed motion's two memoranda.

18 **IT IS HEREBY STIPULATED**, by and between Plaintiff Ana Patricia
19 Fernandez, and Defendants Los Angeles County, Waldron, and Roth, through their
20 undersigned counsel, subject to approval by this Court, that:

21 1. The motion cut-off date is continued to March 22, 2024, and the last
22 hearing date for dispositive motions to May 10, 2024;

23 2. Defendants will withdraw their pending motion for summary judgment
24 by March 15, 2024;

25 3. Defendants shall file a new motion with a single supporting
26 memorandum of points and authorities that does not exceed 13,000 words no later
27 than March 22, 2024;

28 4. Plaintiff shall have a total of 13,000 words for her opposition, which

1 shall be filed no later than April 12, 2024;

2 5. Defendants' reply brief, if any, will be subject to the standard 7,000-
3 word limit; and

4 6. The matter will be heard by this Court on May 10, 2024, or as soon
5 thereafter as it is available.

6
7 Date: March 13, 2024

MICHEL & ASSOCIATES, P.C.

8
9 /s/ Anna M. Barvir

10 Anna M. Barvir

11 Attorneys for Plaintiff

12 Date: March 13, 2024

LOGAN MATHEVOSIAN & HUR LLP

13
14 /s/ Amber A. Logan

15 Amber A. Logan

16 Attorneys for Defendants

17 **ATTESTATION OF E-FILED SIGNATURES**

18 I, Anna M. Barvir, am the ECF User whose ID and password are being used
19 to file this STIPULATION FOR LEAVE TO WITHDRAW PENDING MOTION
20 FOR SUMMARY JUDGMENT, FOR LEAVE TO FILE A CORRECTED
21 MOTION, AND FOR CONTINUANCE OF CURRENT DISPOSITIVE MOTION
22 DEADLINES. In compliance with Central District of California L.R. 5-4.3.4, I
23 attest that all signatories are registered CM/ECF filers and have concurred in this
24 filing.

25 Date: March 13, 2024

/s/ Anna M. Barvir

26 Anna M. Barvir

CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *Fernandez, v. Los Angeles County, et al.*
Case No.: 2:20-cv-09876 DMG (PDx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

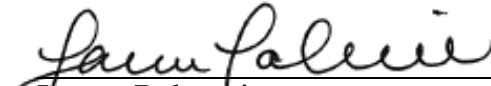
**STIPULATION FOR LEAVE TO WITHDRAW PENDING MOTION FOR
SUMMARY JUDGMENT, FOR LEAVE TO FILE A CORRECTED
MOTION, AND FOR CONTINUANCE OF CURRENT DISPOSITIVE
MOTION DEADLINES**

on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

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Logan Mathevosian & Hur LLP
3435 Wilshire Blvd., Suite 2740
Los Angeles, CA 90010
*Attorneys for Defendants Los Angeles County,
Wyatt Waldron, and John Roth*

I declare under penalty of perjury that the foregoing is true and correct.

Executed March 13, 2024.



Laura Palmerin