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John Roth, and Wyatt Waldron

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)

**SECOND JOINT STIPULATION AND
REQUEST TO CONTINUE JURY
TRIAL AND EXTEND PRETRIAL
DEADLINES**

Pursuant to Local Rule 7-1 and the Court's order at the May 10, 2024 hearing on Defendant County of Los Angeles and former Defendants John Roth and Wyatt Waldron's Motion for Summary Judgment, Plaintiff Ana Patricia Fernandez and Defendant Los Angeles County, through their counsel of record, jointly request that this Court continue the jury trial and extend the pretrial deadlines.

1 WHEREAS, on March 7, 2023, the Court issued the initial Scheduling and Case
2 Management Order re Jury Trial (Dkt. 64);

3 WHEREAS, on November 13, 2023, pursuant to the Parties' joint stipulation (Dkt.
4 68), the Court amended the Scheduling and Case Management Order (Dkt. 69), setting
5 trial for July 23, 2024, and related pre-trial deadlines;

6 WHEREAS, on March 22, 2024, Defendant County of Los Angeles and former
7 Defendants John Roth and Wyatt Waldron filed a Motion for Summary Judgment (Dkt.
8 79);

9 WHEREAS, on May 10, 2024, the Defendants' Motion for Summary Judgment
10 came for hearing, and the Court issued a tentative order granting in part and denying in
11 part the Defendants' Motion for Summary Judgment;

12 WHEREAS, at the hearing, the Parties informed the Court that, should the tentative
13 ruling stand, the Parties may be able to resolve the remaining issues without trial and
14 requested additional time to discuss the possibility of settlement;

15 WHEREAS, on May 14, 2024, the Court issued an order adopting the tentative
16 ruling as the final order of the Court, ordering the parties to set a settlement conference
17 with the assigned Magistrate Judge forthwith, and ordering the parties to meet and confer
18 and file a joint stipulation proposing new pretrial and trial dates;

19 WHEREAS, the parties have not yet scheduled a settlement conference with the
20 Magistrate Judge but will do so promptly;

21 WHEREAS, any proposed settlement will require approval by the Los Angeles
22 County Board of Supervisors, and Defendants estimate that the process for obtaining final
23 approval may take up to 180 days to complete;

24 To permit time for any potential settlement to be considered by the County and, if
25 approved, for the terms of the settlement to be fulfilled, THE PARTIES HEREBY
26 STIPULATE AND JOINTLY REQUEST the Court issue an order continuing the trial
27 date and all remaining pretrial deadlines as follows:

28 ///

Event	Current Date/Deadline	Proposed Date/Deadline
Trial	July 23, 2024, 8:30 AM	January 14, 2025 8:30 AM
Final Pretrial Conference	June 25, 2024, 2:00 PM	December 17, 2024 2:00 PM
L.R. 16-2 Meeting of Counsel Deadline	May 16, 2024	November 5, 2024
Settlement Conference Completion Date	May 28, 2024	August 1, 2024
Joint Status Report re Settlement	June 4, 2024	November 26, 2024
Motions in Limine Filing Deadline	June 4, 2024	November 26, 2024
Opposition to Motion in Limine Filing Deadline	June 11, 2024	December 3, 2024
Proposed Pretrial Conference Order	June 4, 2024	November 26, 2024
Contentions of Fact/Law	June 4, 2024	November 26, 2024
Pretrial Exhibit Stipulation	June 4, 2024	November 26, 2024
Joint Exhibit List	June 4, 2024	November 26, 2024
Witness Lists & Joint Trial Witness Time Estimate Form	June 4, 2024	November 26, 2024
Agreed Statement of the Case	June 4, 2024	November 26, 2024
Proposed Voir Dire Questions	June 4, 2024	November 26, 2024
Joints Statement of Jury Instructions & Joint Statement of Disputed Instructions	June 4, 2024	November 26, 2024
Verdict Forms	June 4, 2024	November 26, 2024

IT IS SO STIPULATED AND AGREED.

1 Dated: May 15, 2024

MICHEL & ASSOCIATES, P.C.

2 s/ Anna M. Barvir

3 Anna M. Barvir
4 Counsel for Plaintiff Ana Patricia
Fernandez

5 Dated: May 15, 2024

**LOGAN MATHEVOSIAN & HUR,
LLP**

6 s/ Amber A. Logan

7 Amber A. Logan
8 Counsel for Defendant County of Los
9 Angeles

10 **ATTESTATION OF E-FILED SIGNATURES**

11 I, Anna M. Barvir, am the ECF User whose ID and password are being used to file
12 this SECOND JOINT STIPULATION AND REQUEST TO CONTINUE JURY TRIAL
13 AND EXTEND PRETRIAL DEADLINES. In compliance with Central District of
14 California L.R. 5-4.3.4, I attest that all signatories are registered CM/ECF filers and have
15 concurred in this filing.

16 Dated: May 16, 2024

s/ Anna M. Barvir

17 Anna M. Barvir
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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:

**SECOND JOINT STIPULATION AND REQUEST TO CONTINUE JURY TRIAL
AND EXTEND PRETRIAL DEADLINES**

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

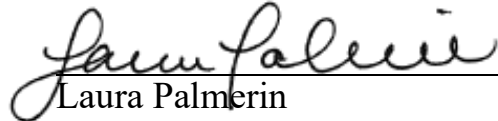
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Los Angeles, CA 90010

*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 May 16, 2024.



Laura Palmerin