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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 TO
CONTINUE DEADLINE TO FILE
STIPULATION RE: DISMISSAL OR
MOVE TO REOPEN CASE**

Pursuant to Local Rule 7-1, Plaintiff Ana Patricia Fernandez and Defendant Los Angeles County, through their counsel of record, jointly request that this Court continue the deadline to file a stipulation for dismissal or motion to reopen this case.

WHEREAS, on July 16, 2024, the parties filed a Notice of Settlement (Dkt. No. 100) informing this Court that, having participated in a settlement conference with the Honorable Magistrate Judge Patricia Donahue, the parties had successfully reached a full settlement of the case;

WHEREAS, on July 19, 2024, the Court issued a Minute Order (Dkt. No. 101), placing this case in inactive status and ordering the parties to “file either (1) a stipulation and proposed order for dismissal of the action or judgment, or (2) a motion to reopen if settlement has not been consummated” by November 16, 2024;

WHEREAS, on November 15, 2024, the parties filed a joint stipulation and proposed order to continue the deadline to file either a stipulation for dismissal or a

1 motion to reopen the case (Dkt. No. 102);

2 WHEREAS, on November 18, 2024, the Court granted the request and continued
3 the deadline to December 16, 2024 (Dkt. No. 103);

4 WHEREAS, the parties have agreed, in principle, to all material terms but the final
5 settlement agreement is subject to approval by the Los Angeles County Claims Board at a
6 regularly scheduled meeting. The number of items placed on each month's agenda is
7 limited and given the number of settlements presented by County agencies for approval, it
8 is not guaranteed that this matter will be placed on the agenda immediately after
9 submission to the Claims Board. Although this settlement has been submitted, it is
10 possible that this matter may not be placed on the agenda for approval until the month of
11 March or April 2025.

12 WHEREAS, If the settlement is approved by the Claims Board, the settlement is
13 typically processed (e.g., a settlement check is issued) within 4-6 weeks after approval;

14 WHEREAS, another brief continuance is necessary to give the County sufficient
15 time to approve the settlement agreement and for the terms of the settlement to be
16 fulfilled; and

17 WHEREAS, a brief continuance will conserve the resources of both the parties and
18 the Court while final action from the County is pending.

19 THE PARTIES HEREBY STIPULATE AND JOINTLY REQUEST that the Court
20 issue an order continuing the deadline for the parties to file either (1) a stipulation and
21 proposed order for dismissal of the action or judgment or (2) a motion to reopen if
22 settlement has not been consummated until April 15, 2025.

23 IT IS SO STIPULATED.

24
25 Date: December 12, 2024

Respectfully submitted,

MICHEL & ASSOCIATES, P.C.

s/ Anna M. Barvir

Anna M. Barvir

Counsel for Plaintiff Ana Patricia Fernandez

1 Date: December 12, 2024

LOGAN MATHEVOSIAN & HUR, LLP

2 s/ Amber A. Logan

3 Amber A. Logan

4 Counsel for Defendant County of Los Angeles

5
6 **ATTESTATION OF E-FILED SIGNATURES**

7 I, Anna M. Barvir, am the ECF User whose ID and password are being used to file
8 this SECOND JOINT STIPULATION TO CONTINUE DEADLINE TO FILE
9 STIPULATION RE: DISMISSAL OR MOVE TO REOPEN CASE. In compliance with
10 Central District of California L.R. 5-4.3.4, I attest that all signatories are registered
11 CM/ECF filers and have concurred in this filing.

12 s/ Anna M. Barvir

13 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:

**SECOND JOINT STIPULATION TO CONTINUE DEADLINE TO FILE
STIPULATION RE: DISMISSAL OR MOVE TO REOPEN CASE**

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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Los Angeles, CA 90010

Attorneys for Defendant Los Angeles County

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

Executed December 13, 2024.



Laura Fera