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

14 ANA PATRICIA FERNANDEZ, an  
15 individual,

16 Plaintiff,

17 v.

18 LOS ANGELES COUNTY, et al.,

19 Defendants.

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

21 **JOINT STIPULATION FOR**  
22 **DISMISSAL OF THE ACTION**

23 TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

24 PLEASE TAKE NOTICE THAT Plaintiff Ana Patricia Fernandez and Defendant  
25 Los Angeles County (collectively, “the Parties,”) have reached a settlement agreement to  
26 resolve the issues in the above-referenced case, which all parties have executed.

27 PLEASE TAKE FURTHER NOTICE THAT, pursuant to this Court’s April 15,  
28 2025 Order Continuing Deadline to File Stipulate Re Dismissal or Move to Reopen Case  
(ECF No. 108), the parties, by and through their counsel of record, hereby jointly stipulate  
and request that this Court dismiss this case with prejudice.

WHEREAS, Plaintiff Fernandez has alleged that she sustained damages in  
December 2019, in the County of Los Angeles, as a result of the seizure of property and  
the Defendant Los Angeles’ County’s policy for assessing a fee for the return of said  
seized property pursuant to California Penal Code section 33880;

1 WHEREAS, Plaintiff Fernandez brought suit against Defendant Los Angeles  
2 County in the above-named court under 42 U.S.C. § 1983, seeking declaratory relief, and  
3 as well as various types of money damages (ECF No. 31);

4 WHEREAS, in addition to the County, Plaintiff also sued the Los Angeles County  
5 Sheriff’s Department, Alex Villanueva, in his official capacity as Sheriff of Los Angeles  
6 County, and individuals Wyatt Waldron, John Roth, Susan O’Leary Brown, Richard  
7 Leon, Murray Jacob, David Roach, Salvador Moreno IV, Jason Ames, Kyle Dingman, and  
8 Nicholas Saylor. On September 28, 2022, this Court dismissed all claims against the  
9 LASD, Sheriff Villanueva, and Individual Defendants Brown, Leon, Jacob, Roach,  
10 Moreno, Ames, Dingman, and Saylor. (ECF No. 53.) The Court also dismissed Plaintiff’s  
11 claims against Defendants Roth and Waldron “for violating the Fourth Amendment by  
12 assessing an unlawful fee,” but not her Fourth Amendment and state-law tort claims  
13 against Roth and Waldron for damage done during the initial seizure. The Court also  
14 allowed both Fourth Amendment theories and all state-law claims against the County to  
15 proceed;

16 WHEREAS, on May 19, 2024, the Court granted Defendants’ motion for summary  
17 judgment as to Plaintiff’s Fourth Amendment and state-law tort claims against Defendants  
18 Los Angeles County, Roth, and Waldron, stemming from the alleged damage to the seized  
19 firearm collection. (ECF No. 90.) The Court denied Defendant’s summary judgment  
20 motion as to Plaintiff’s claim that the County’s refusal to return the seized firearms based  
21 on the unlawful demand that Ms. Fernandez pay an illegal fee violated the Fourth  
22 Amendment;

23 WHEREAS, on July 16, 2024, the parties filed a Notice of Settlement (ECF No.  
24 100) informing this Court that, having participated in a settlement conference with the  
25 Honorable Magistrate Judge Patricia Donahue, the parties successfully reached, subject to  
26 formal approval by Defendant Los Angeles County, a full settlement of the remaining  
27 claims;

28 WHEREAS, on July 19, 2024, the Court issued a Minute Order (ECF No. 101),

1 placing this case in inactive status and ordering the parties to “file either (1) a stipulation  
2 and proposed order for dismissal of the action or judgment, or (2) a motion to reopen if  
3 settlement has not been consummated” by November 16, 2024;

4 WHEREAS, on November 18, 2024, the Court granted the parties’ first joint  
5 stipulation to continue the deadline to file either a stipulation for dismissal or a motion to  
6 reopen the case and continued the deadline to December 16, 2024 (ECF No. 103);

7 WHEREAS, on December 16, 2024, the Court granted the parties’ second request  
8 order to continue the deadline to file either a stipulation for dismissal or a motion to  
9 reopen the case and continued the deadline to April 15, 2025 (ECF No. 106);

10 WHEREAS, Defendant Los Angeles County formally approved the settlement  
11 agreement on March 17, 2025, and thereafter began the process of executing a check for  
12 the payment of the agreed upon settlement payment;

13 WHEREAS, on April 15, 2025, the Court granted the parties’ third request to  
14 continue the deadline to file either a stipulation for dismissal or a motion to reopen the  
15 case and continued the deadline to June 16, 2025 (ECF No. 108);

16 WHEREAS, on May 30, 2025, counsel for Plaintiff Fernandez received the final  
17 settlement check sent by counsel for Defendant Los Angeles Couty and, pursuant to the  
18 terms of the settlement agreement, placed the full amount into trust be held on Plaintiff’s  
19 behalf until this matter is dismissed and an order is entered by this Court.

20 NOW, THEREFORE, pursuant to the mutual agreement of the Parties, the  
21 Parties respectfully hereby stipulate and jointly request that the Court enter an order  
22 dismissing with prejudice all claims asserted in Plaintiffs’ First Amended Complaint for  
23 Declaratory Relief and Damages (ECF No. 31) with each side to bear their own costs.

24 IT IS SO STIPULATED.

25 Date: June 12, 2025

**MICHEL & ASSOCIATES, P.C.**

*/s/ Anna M. Barvir*

Anna M. Barvir  
Attorneys for Plaintiff

1 Date: June 12, 2025

**LOGAN MATHEVOSIAN & HUR, LLP**

2 */s/ Amber A. Logan*

3 Amber A. Logan

4 Attorneys for Defendant County of Los Angeles

5 **ATTESTATION OF E-FILED SIGNATURES**

6 I, Anna M. Barvir, am the ECF User whose ID and password are being used to file  
7 this JOINT STIPULATION FOR DISMISSAL OF THE ACTION. In compliance with  
8 Central District of California L.R. 5-4.3.4, I attest that all signatories are registered  
9 CM/ECF filers and have concurred in this filing.

10 *s/ Anna M. Barvir*

11 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:

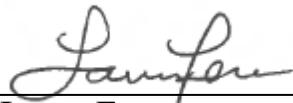
**JOINT STIPULATION FOR DISMISSAL OF THE ACTION**

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

Amber A. Logan  
[amberlogan@lmhfirm.com](mailto:amberlogan@lmhfirm.com)  
[lmh@lmhfirm.com](mailto:lmh@lmhfirm.com)  
Logan Mathevosian & Hur LLP  
3435 Wilshire Blvd., Suite 2740  
Los Angeles, CA 90010  
*Attorneys for Defendant Los Angeles County*

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

Executed June 12, 2025.

  
\_\_\_\_\_  
Laura Fera