

1 JOSEPH T. MCNALLY
 First Assistant United States Attorney
 2 DAVID M. HARRIS
 Assistant United States Attorney
 3 Chief, Civil Divisions
 JOANNE S. OSINOFF
 4 Assistant United States Attorney
 Chief, Complex and Defensive Litigation Section
 5 JILL S. CASSELMAN (Cal. Bar No. 266085)
 MATTHEW J. SMOCK (Cal. Bar No. 293542)
 6 Assistant United States Attorneys
 Federal Building, Suite 7516
 7 300 North Los Angeles Street
 Los Angeles, CA 90012
 8 Telephone: (213) 894-0165; 0397
 Facsimile: (213) 894-7819
 9 E-mail: Jill.Casselmann@usdoj.gov
 E-mail: Matthew.Smock@usdoj.gov

10 Attorneys for Plaintiff UNITED STATES OF AMERICA

11
 12 UNITED STATES DISTRICT COURT
 13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
 14 WESTERN DIVISION

15 UNITED STATES OF AMERICA,
 16 Plaintiff,
 17 v.
 18 SOUTHERN CALIFORNIA EDISON
 COMPANY and Does 1 to 10,
 19 Defendants.
 20

No. 2:20-cv-11020-WLH-AS

**NOTICE OF PROPOSED
 SETTLEMENT; DECLARATION OF
 MATTHEW J. SMOCK**

[PROPOSED] ORDER

Hon. Wesley L. Hsu
 United States District Judge

21
 22
 23
 24
 25
 26
 27
 28

1 Following private mediation, the parties have reached a proposed settlement
2 subject to Department of Justice approval. The parties respectfully request that the Court
3 vacate the trial date and all pretrial deadlines and stay this action for 120 days. A
4 statement of good cause and the matters required by this Court’s Standing Order are
5 contained within the accompanying Declaration of Matthew J. Smock. A [Proposed]
6 Order consistent with this request is attached hereto.

7
8 Dated: October 10, 2023

Respectfully submitted,

9 JOSEPH T. MCNALLY
10 First Assistant United States Attorney
11 DAVID M. HARRIS
12 Assistant United States Attorney
13 Chief, Civil Division
14 JOANNE S. OSINOFF
15 Assistant United States Attorney
16 Chief, Complex and Defensive Litigation Section

17 /s/ Matthew J. Smock*

18 JILL S. CASSELMAN
19 MATTHEW J. SMOCK
20 Assistant United States Attorneys

21 Attorneys for Plaintiff
22 UNITED STATES OF AMERICA

23
24
25
26
27
28
*Pursuant to Local Rule 5-4.3.4(2), the filer attests that all signatories listed, and on
whose behalf the filing is submitted, concur in the filing’s content and have authorized
the filing.

1 Dated: October 10, 2023

Respectfully submitted,
HUESTON HENNIGAN LLP

2
3
4 /s/ Douglas J. Dixon
JOHN C. HUESTON
5 DOUGLAS J. DIXON
6 CRAIG A. FLIGOR

7 Attorneys for Defendant
SOUTHERN CALIFORNIA EDISON
8 COMPANY
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

