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15 Attorney for Defendants
16 COUNTY OF LOS ANGELES,
17 COUNTY SHERIFF'S DEPARTMENT,
18 SHERIFF ALEX VILLANUEVA

19 **UNITED STATES DISTRICT COURT**

20 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

21 PABLO UNZUETA,

22 PLAINTIFF,

23 v.

24 COUNTY OF LOS ANGELES; LOS
25 ANGELES COUNTY SHERIFF'S
26 DEPARTMENT; SHERIFF ALEX
27 VILLANUEVA; AND DOES 1
28 THROUGH 10, INCLUSIVE,

DEFENDANTS.

CASE NO.: 2:21-cv-08378-AB (AGR_x)

Hon. André Birotte Jr.

**NOTICE OF SETTLEMENT
BETWEEN PLAINTIFF AND
DEFENDANT COUNTY OF LOS
ANGELES; JOINT STIPULATION;
[PROPOSED] ORDER**

FAC filed: Mar. 17, 2022
Current response date: Apr. 18, 2022
New response date: Sep. 15, 2022

TRIAL DATE: None Set

1 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff
2 Pablo Unzueta (“Plaintiff”), through his counsel of record, UC IRVINE SCHOOL OF
3 LAW INTELLECTUAL PROPERTY, ARTS, AND TECHNOLOGY CLINIC, and Defendant
4 County of Los Angeles (“Defendant”), through its counsel of record, GLASER WEIL
5 FINK HOWARD AVCHEN & SHAPIRO LLP, as follows:

6 1. On April 12, 2022, the Plaintiff and Defendant reached a tentative
7 agreement. As part of this settlement, Defendant shall be dismissed, with prejudice,
8 as a party to this action. In order to settle this matter, and as a condition to the
9 effectiveness of the settlement, it is necessary for the tentative settlement agreement
10 to be presented and approved by Defendant’s Claims Board and its Board of
11 Supervisors. It is expected that this process will require approximately five (5)
12 months.

13 2. The Plaintiff and Defendant request additional time to complete the
14 settlement of this matter. Specifically, these parties request that the Court enter the
15 proposed order filed concurrently herewith. This order would give the parties 153
16 days, or by September 15, 2022, within which to either file a dismissal of the entire
17 action against Defendant or file a status report regarding the progress of their
18 settlement efforts. The order would also vacate all dates and pending matters off
19 calendar against Defendant. Good cause exists to enter this order because it will
20 facilitate settlement and because the Plaintiff and Defendant agree. *See*
21 Fed.R.Civ.P. 16(b)(4) (the Court may modify a schedule for good cause); L.R. 16-
22 15 (“It is the policy of the Court to encourage disposition of civil litigation by
23 settlement when such is in the best interest of the parties. The Court favors any
24 reasonable means to accomplish this goal.”)

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27 **IT IS SO STIPULATED**
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DATED: April 15, 2022

UC IRVINE SCHOOL OF LAW
INTELLECTUAL PROPERTY,
ARTS, AND TECHNOLOGY
CLINIC

By: /s/ Susan Seager
SUSAN E. SEAGER
*Pro Bono Counsel for Plaintiff
Pablo Unzueta*

DATED: April 15, 2022

GLASER WEIL FINK HOWARD
AVCHEN & SHAPIRO LLP

By: /s/ Andrew Baum
ANDREW BAUM
*Attorney for Defendants
County of Los Angeles
Los Angeles Sheriff's Department
Sheriff Alex Villanueva*

FILER'S ATTESTATION

Pursuant to Central District of California Local Rule 5-4.3.4(a)(2)(i), I hereby attest that concurrence in the filing of this document has been obtained from all the signatories above.

DATED: April 15, 2022

By: /s/ Susan Seager
SUSAN E. SEAGER