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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

MARVIN SHADD, et al.

Plaintiffs,

vs.

COUNTY OF SACRAMENTO, et al.,

Defendants.

Consolidated Case No. 2:12-cv-002834-MCE-KJN

**JOINT REQUEST FOR ORDER GRANTING  
STIPULATION FOR DISMISSAL; ORDER  
THEREON**

TYLER COSTA, et al.

Plaintiffs,

vs.

COUNTY OF SACRAMENTO, et al.,

Defendants.

Consolidated Case No. 2:12-cv-002834-MCE-KJN

**JOINT REQUEST FOR ORDER GRANTING  
STIPULATION FOR DISMISSAL; ORDER  
THEREON**

MELOSHA FIELDS, et al.

Plaintiffs,

vs.

COUNTY OF SACRAMENTO, et al.,

Defendants.

Consolidated Case No. 2:12-cv-002834-MCE-KJN

**JOINT REQUEST FOR ORDER GRANTING  
STIPULATION FOR DISMISSAL; ORDER  
THEREON**

TRAVIS FORD, et al.

Plaintiffs,

vs.

COUNTY OF SACRAMENTO, et al.,

Defendants.

Consolidated Case No. 2:12-cv-002834-MCE-KJN

**JOINT REQUEST FOR ORDER GRANTING  
STIPULATION FOR DISMISSAL; ORDER  
THEREON**

On January 28, 2015, counsel for all parties to this litigation, which consists of four consolidated actions, convened for a day-long mediation before the Honorable Raul A. Ramirez (ret.). Terms of a settlement agreement and release were successfully negotiated through the mediation; however, the settlement was contingent upon the County of Sacramento Board of Supervisor's approval and plaintiffs' counsel obtaining the signatures and releases of all plaintiffs to these consolidated actions.

On February 24, 2015, the County of Sacramento Board of Supervisors approved the terms of the parties' negotiated settlement.

During the months of February and March, plaintiffs' counsel searched for and located the several plaintiffs to these actions, including some plaintiffs who resided or were incarcerated out-of-state, for the purpose of obtaining their consent to the terms of the negotiated settlement.

On April 3, 2015, the terms of the contingent settlement agreement between the parties were satisfied, and the settlement agreement was entered. A stipulation for dismissal was drafted and distributed to all parties' counsel for permission to sign and file.

On April 5, 2015, plaintiffs' counsel obtained permission to file, and did file, a stipulation for dismissal of these four consolidated actions, pursuant to the terms of the negotiated settlement and

Federal Rule of Civil Procedure 41(a)(1)(A)(ii). (*See* ECF Doc. 83.)

Because all claims have been resolved through the settlement agreement, the parties respectfully request that this Court order the parties' stipulation for dismissal effective and close this matter.

Dated: April 8, 2015

Respectfully Submitted,  
LAW OFFICE OF MARK E. MERIN

/s/ Mark E. Merin  
By: \_\_\_\_\_

Mark E. Merin

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RICHARD RUIZ, TRAVIS FORD, ALICIA KAFKA,  
QUIONA LIM, EMMANUEL RODRIGUEZ, ERIN  
CRAWFORD, and BILLY NELSON

Dated: April 8, 2015

Respectfully Submitted,  
**P O R T E R | S C O T T**

/s/ Derek J. Haynes  
(as authorized on April 8, 2015)

By: \_\_\_\_\_  
Derek J. Haynes

Attorney for Defendants  
COUNTY OF SACRAMENTO and VERNE SPEIRS

Dated: April 8, 2015

Respectfully Submitted,  
RIVERA & ASSOCIATES

/s/ Jesse M. Rivera  
(as authorized on April 8, 2015)

By: \_\_\_\_\_  
Jesse M. Rivera


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MICHAEL OCAMPO, ANDREW YOUNG,  
FRANCISCO RECINOS, CARL BALLS, and  
RONALD EARP

**ORDER**

GOOD CAUSE APPEARING, and in accordance with the foregoing stipulation of the parties, the Court hereby GRANTS the parties' stipulation for dismissal, filed with this Court on April 6, 2015, and further ORDERS that these four consolidated cases be dismissed. The Clerk of Court is ordered to close the file.

IT IS SO ORDERED.

Dated: April 9, 2015

  
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MORRISON C. ENGLAND, JR., CHIEF JUDGE  
UNITED STATES DISTRICT COURT