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

38 UNITED STATES DISTRICT COURT
39 EASTERN DISTRICT OF CALIFORNIA
40 SACRAMENTO DIVISION

41 MARVIN SHADD, et al.

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

43 Plaintiffs,

44 **JOINT REQUEST FOR ORDER GRANTING**
45 **STIPULATION FOR DISMISSAL; ORDER**
46 **THEREON**

47 vs.

48 COUNTY OF SACRAMENTO, et al.,

49 Defendants.

1 TYLER COSTA, et al.

2 Plaintiffs,

3 vs.

4 COUNTY OF SACRAMENTO, et al.,

5 Defendants.

6 MELOSHA FIELDS, et al.

7 Plaintiffs,

8 vs.

9 COUNTY OF SACRAMENTO, et al.,

10 Defendants.

11 TRAVIS FORD, et al.

12 Plaintiffs,

13 vs.

14 COUNTY OF SACRAMENTO, et al.,

15 Defendants.

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

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

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

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

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

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

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

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

4 Dated: April 8, 2015

5 Respectfully Submitted,
6 LAW OFFICE OF MARK E. MERIN

7 By: _____
8 /s/ Mark E. Merin

9 Mark E. Merin

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16 MARTINEZ, STEPHEN BAUMANN, TONY
17 JIMENEZ, SAGE LOPEZ, MELOSHA FIELDS,
18 MELVIN FIELDS, DALE GROSSER, GUILLERMO
19 RICHARD RUIZ, TRAVIS FORD, ALICIA KAFKA,
20 QUIONA LIM, EMMANUEL RODRIGUEZ, ERIN
21 CRAWFORD, and BILLY NELSON

22 Dated: April 8, 2015

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

25 By: _____
26 /s/ Derek J. Haynes

27 (as authorized on April 8, 2015)

28 By: _____
29 Derek J. Haynes

30 Attorney for Defendants
31 COUNTY OF SACRAMENTO and VERNE SPEIRS

32 Dated: April 8, 2015

33 Respectfully Submitted,
34 RIVERA & ASSOCIATES

35 By: _____
36 /s/ Jesse M. Rivera
37 (as authorized on April 8, 2015)

38 By: _____
39 Jesse M. Rivera

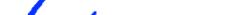
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45 MICHAEL OCAMPO, ANDREW YOUNG,
46 FRANCISCO RECINOS, CARL BALLS, and
47 RONALD EARP

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


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