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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

29 SARA ADAM, et al.,

30 No.: 2:14-cv-02795 WBS CKD

31 Plaintiffs,

32 vs.

33 BRET BRZYSZCZ, CITY OF  
34 ROSEVILLE, COUNTY OF PLACER,  
35 COUNTY OF SACRAMENTO, and  
36 DOES 1 THROUGH 50,

37 Defendants.

**JOINT STIPULATION TO DISMISS  
CERTAIN CLAIMS BY PLAINTIFFS  
AGAINST COUNTY OF SACRAMENTO;  
ORDER THEREON**

38 WHEREAS plaintiffs SARA ADAM, JESSE HEREDIA, ISABELLA H., MYA H.,  
39 MARGARITA YDROGO, JOSEFA DURAN, GRACE DURAN, CATRINA RODRIGUEZ,  
40 ANTONIO DURAN, ANITA FELIX, JOSE FELIX, ALEX FELIX III, GISELLE F., AIDEN F.,  
41 PENELOPE F., JORGE CAMPOS, ALEXIS SANDOVAL, ALIZZA MARES, DAVINA  
42 SANCHEZ, JUAN SANCHEZ, MIKKAYLA GUTIERREZ, SANTINO S., JULIAN S.,  
43 DESTINY C., DANNY GARCIA and SAMUEL DURAN filed a Complaint against defendant

1 COUNTY OF SACRAMENTO on November 29, 2014, alleging constitutional violations rising  
2 from the execution of search warrants at several residences;

3 WHEREAS, the parties presently agree that employees of the County of Sacramento  
4 participated in the execution of a search warrant at only one of the locations referenced in the  
5 Complaint, namely, 5612 Forestwood Drive in Sacramento County;

6 WHEREAS, the only plaintiffs who were at 5612 Forestwood Drive at the time of the  
7 search were SARA ADAM, JESSE HEREDIA, ISABELLA H., and MYA H.;

8 WHEREAS the parties agree that none of the additional plaintiffs, other than those located  
9 at 5612 Forestwood Drive, have any claims against defendant County of Sacramento; and

10 WHEREAS, the parties wish to narrow the claims and issues in this matter in order to  
11 avoid unnecessary, costly, and time-consuming discovery and motions practice;

12  
13 THEREFORE, the parties hereby stipulate, by and through their counsel of record, as  
14 follows:

15 1. All claims in the Complaint, brought against the County of Sacramento by  
16 plaintiffs who were not present at the 5612 Forestwood Drive address, shall be dismissed without  
17 prejudice;

18 2. The plaintiffs dismissing without prejudice the claims alleged in the Complaint  
19 against the County of Sacramento are:

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22 (1) Margarita Ydrogo  
23 (2) Josefa Duran, by and through her power of attorney, Grace Duran  
24 (3) Grace Duran  
25 (4) Catarina Rodriguez  
26 (5) Antonio Duran  
27 (6) Anita Felix  
28 (7) Jose Felix  
29 (8) Alex Felix III

- 1 (9) Aiden F., by and through his father Alex Felix
- 2 (10) Penelope F., by and through her father Alex Felix
- 3 (11) Jorge Campos
- 4 (12) Alexis Sandoval
- 5 (13) Alizza Mares
- 6 (14) Davina Sanchez
- 7 (15) Juan Sanchez
- 8 (16) Mikkayla Gutierrez
- 9 (17) Santino S., by and through his mother Davina Sanchez
- 10 (18) Julian S., by and through his mother Davina Sanchez
- 11 (19) Destiny C., by and through her mother Davina Sanchez
- 12 (20) Danny Garcia
- 13 (21) Samuel Duran

14 3. The following plaintiffs continue to assert claims against the County of  
15 Sacramento:

- 16 (1) Sara Adam
- 17 (2) Jesse Heredia
- 18 (3) Isabella H.
- 19 (4) Mya H.

20 IT IS SO STIPULATED.

21  
22  
23 DATE: December 16, 2015

/s/ Alexander L. Nowinski

24 ROBERT L. CHALFANT  
25 ALEXANDER L. NOWINSKI  
26 CREGGER & CHALFANT LLP  
27 Attorneys for Defendant COUNTY OF  
28 SACRAMENTO

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3 DATE: December 17, 2015

/s/ Loren L. Lunsford  
4 LOREN L. LUNSFORD  
5 AMBER LUNSFORD  
6 Attorneys for Plaintiffs SARA ADAM, JESSE  
7 HEREDIA, ISABELLA H., MYA H.,  
8 MARGARITA YDROGO, JOSEFA DURAN,  
9 GRACE DURAN, CATRINA RODRIGUEZ,  
10 ANTONIO DURAN, ANITA FELIX, JOSE FELIX,  
11 ALEX FELIX III, GISELLE F., AIDEN F.,  
12 PENELOPE F., JORGE CAMPOS, ALEXIS  
13 SANDOVAL, ALIZZA MARES, DAVINA  
14 SANCHEZ, JUAN SANCHEZ, MIKKAYLA  
15 GUTIERREZ, SANTINO S., JULIAN S.,  
16 DESTINY C., DANNY GARCIA and SAMUEL  
17 DURAN

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28 **ORDER**

15 After considering the stipulation by and between the parties through their counsel of  
16 record, the Court orders that:

17 1. The claims against the County of Sacramento brought by plaintiffs Margarita  
18 Ydrogo; Josefa Duran, by and through her power of attorney, Grace Duran; Grace Duran;  
19 Catarina Rodriguez; Antonio Duran; Anita Felix; Jose Felix; Alex Felix III; Aiden F., by and  
20 through his father Alex Felix; Penelope F., by and through her father Alex Felix; Jorge Campos;  
21 Alexis Sandoval; Alizza Mares; Davina Sanchez; Juan Sanchez; Mikkayla Gutierrez; Santino S.,  
22 by and through his mother Davina Sanchez; Julian S., by and through his mother Davina Sanchez;  
23 Destiny C., by and through her mother Davina Sanchez; Danny Garcia; and Samuel Duran are  
24 DISMISSED WITHOUT PREJUDICE.

25 **IT IS SO ORDERED.**

26 Dated: December 21, 2015

  
27 **WILLIAM B. SHUBB**  
28 **UNITED STATES DISTRICT JUDGE**