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6 Attorneys for Plaintiff JAMES NOLAN,  
individually and on behalf of others  
7 similarly situated

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9  
10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 JAMES NOLAN,

13 Plaintiff,

14 vs.

15 CITY OF LOS ANGELES, et al.,

16 Defendants.  
17

Case No.: CV-03-2190 GAF (AJWx)

**STIPULATED JUDGMENT AND  
ORDER**

18  
19 Having considered the Settlement Agreement and Release between plaintiffs  
20 Roy Ballesteros, Jason Beatty, Robert Calderon, Harold Cox, William Dougherty,  
21 Ietia Eston, Ellis Imaizumi, Rick Johnson, Johnnie Jones, Helen Lopez, Samuel  
22 Earl Mark, James J. May, Jr., Leonard Miller, Kinard Moffatt, Martha Moran,  
23 Hubert Nino, James Nolan, Robert Nowak, Juan Santos, Oscar Winslow, and  
24 Johnnie Zamora ("Plaintiffs") and defendant City of Los Angeles ("Defendant"), as  
25 well as the Jury Verdict entered on April 22, 2011 as to Plaintiffs Jason Beatty,  
26 Helen Lopez, Samuel Earl Mark, and James Nolan ("Trial Plaintiffs"), and the  
27 entire record in the above-referenced matter, and upon joint application of Plaintiffs  
28 and Defendant, by and through their attorneys of record:

1 IT IS HEREBY ORDERED, ADJUDGED AND DECREED as follows:

- 2 1. On or about April 12, 2011 a jury trial in this matter commenced.  
3 Plaintiffs Jason Beatty, Helen Lopez, Samuel Earl Mark and James  
4 Nolan were represented by Greg K. Hafif and Fenja Klaus of the Law  
5 Offices of Herbert Hafif and defendant City of Los Angeles was  
6 represented by Brian Walter and Geoffrey Sheldon of Liebert Cassidy  
7 Whitmore. At the conclusion of the two week trial, the Jury issued  
8 the “Special Interrogatories and Verdict Form for Plaintiffs James  
9 Nolan, Helen Lopez, Samuel Mark and Jason Beatty” attached hereto  
10 as Exhibit “A” (Docket No. 900). Based upon this Verdict, plaintiffs  
11 and defense counsel entered into settlement discussions, of which a  
12 Settlement Agreement and Release was negotiated.
- 13 2. The Court hereby approves the terms of the Settlement Agreement and  
14 Release as fair, reasonable, appropriate, and in accordance with law,  
15 and hereby incorporates by reference herein the terms of such  
16 Settlement Agreement and Release attached hereto as Exhibit “B”;
- 17 3. Consistent with said Settlement Agreement and Release, this Action is  
18 hereby dismissed with prejudice as to Plaintiffs Roy Ballesteros, Jason  
19 Beatty, Robert Calderon, Harold Cox, William Dougherty, Ietia Eston,  
20 Ellis Imaizumi, Rick Johnson, Johnnie Jones, Helen Lopez, Samuel  
21 Earl Mark, James J. May, Jr., Leonard Miller, Kinard Moffatt, Martha  
22 Moran, Hubert Nino, James Nolan, Robert Nowak, Juan Santos, Oscar  
23 Winslow, and Johnnie Zamora, *only*, provided, however that the Court  
24 will retain jurisdiction for the purpose of enforcing compliance with  
25 the terms of the Settlement Agreement and Release, any and all  
26 motions for attorney’s fees and costs, and this Final Order and  
27 Judgment; and

28 ///

1           4.     That plaintiffs O'Neil Carter, Angela Chu, Tom Danzek and Henry  
2                 Quon have not agreed to the Settlement Agreement and Release, and  
3                 therefore the Court shall retain jurisdiction for all the above four (4)  
4                 named Plaintiffs.

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6     Dated: September 6, 2013

LAW OFFICES OF HERBERT HAFIF

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8                 By: \_\_\_\_/s/ Greg Hafif\_\_\_\_\_  
9                         Greg K. Hafif  
10                        Attorneys for Plaintiffs

11  
12     Dated: September 6, 2013

LIEBERT CASSIDY WHITMORE

13  
14                 By: \_\_\_\_/s/ Brian Walter\_\_\_\_\_  
15                         Brian Walter  
16                        Attorneys for Defendant  
17                        City of Los Angeles

18  
19                 **IT IS SO ORDERED:**

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21   

22     Dated: September 17, 2013

23   \_\_\_\_\_  
24                         Honorable Gary A. Feess  
25                         United States District Court Judge