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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

CORNELIA MARTINEZ, an individual; ANA VELASQUEZ, an individual; CARINA FABIAN, an individual; HILDA DERAS, an individual; CARMEN CASTRO, an individual; DEMETRIUS ALLEN, an individual; MICHAEL PRUDHOMME, an individual; ARTHUR RIVERA, an individual; JAMARCUS REYNOLDS, an individual; PEDRO RAMOS, an individual; MARGARITA MECINAS, an individual; NICOLAS GREGORIO, (Caption continues on next page)

CASE NO.: 2:16-cv-08598-SVW-MRW

JS-6

ORDER ON JOINT STIPULATION OF VOLUNTARY DISMISSAL

Assigned to Hon. Stephen V. Wilson
Department 10A

Complaint Filed: November 17, 2016

JOINT STIPULATION OF VOLUNTARY DISMISSAL AND
PROPOSED CASE SCHEDULES

1 an individual; CARLOS ESCAMILLA,
2 an individual; FRANCESCA
3 ESCAMILLA, an individual; POLONIA
4 HERNANDEZ, an individual; SAJE, a
5 501(c)(3) non-profit organization; STEP
6 UP ON SECOND STREET, INC., a
7 501(c)(3) non-profit organization; on
8 behalf of themselves and all others
9 similarly situated,

10
11 Plaintiffs,

12 v.

13 OPTIMUS PROPERTIES, LLC, a
14 California limited liability company;
15 ROXBURY VENTURES, LLC, a
16 California limited liability company;
17 SOUTH KENMORE PROPERTIES,
18 LLC, a California limited liability
19 company; SOUTH NORMANDIE
20 PROPERTIES, LLC, a California
21 limited liability company;
22 NORMANDIE LINDEN, LLC, a
23 California limited liability company;
24 MAGNOLIA AVENUE PROPERTIES,
25 LLC, a California limited liability
26 company; MARIPOSA/8TH STREET
27 PROPERTIES, LLC, a California
28 limited liability company; and JEROME
MICKELSON, an individual,

Defendants.

18 CORNELIA MARTINEZ, an
19 individual; ANA VELASQUEZ, an
20 individual; HILDA DERAS, an
21 individual; CARMEN CASTRO, an
22 individual; GLORIA MORALES, an
23 individual; and SAJE, INC., a 501(c)(3)
24 non-profit organization,

25 Plaintiffs,

26 v.

27 OPTIMUS PROPERTIES, LLC, a
28 California limited liability company;
(Caption continues on next page)
ROXBURY VENTURES, LLC, a
California limited liability company;
MAGNOLIA AVENUE PROPERTIES,
(Caption continues on next page)

IT IS SO ORDERED.

DATED: August 2, 2017



STEPHEN V. WILSON
UNITED STATES DISTRICT JUDGE

CASE NO.: 2:17-cv-03581-SVW-
MRW

**JOINT STIPULATION OF
VOLUNTARY DISMISSAL AND
PROPOSED CASE SCHEDULES**

Assigned to Hon. Stephen V. Wilson
Department 10A

Complaint Filed: May 11, 2017

1 LLC, a California limited liability
2 company; and JEROME MICKELSON,
3 an individual,
4
5 Defendants.

6 PEDRO RAMOS, an individual;
7 NICOLAS GREGORIO, an individual,
8
9 Plaintiffs,

10 v.
11 OPTIMUS PROPERTIES, LLC, a
12 California limited liability company;
13 ROXBURY VENTURES, LLC, a
14 California limited liability company;
15 SOUTH NORMANDIE PROPERTIES,
16 LLC, a California limited liability
17 company; and JEROME MICKELSON,
18 an individual,
19
20 Defendants.

21 CARLOS ESCAMILLA, an individual;
22 POLONIA HERNANDEZ, an
23 individual; SAJE, INC., a 501(c)(3) non-
24 profit organization,
25
26 Plaintiffs,

27 v.
28 OPTIMUS PROPERTIES, LLC, a
California limited liability company;
ROXBURY VENTURES, LLC, a
California limited liability company;
SOUTH KENMORE PROPERTIES,
LLC, a California limited liability
company; and JEROME MICKELSON,
an individual,
Defendants.

(Caption continues on next page)

CASE NO.: 2:17-cv-03582-SVW-MRW

JOINT STIPULATION OF VOLUNTARY DISMISSAL AND PROPOSED CASE SCHEDULES

Assigned to Hon. Stephen V. Wilson
Department 10A

Complaint Filed: May 11, 2017

CASE NO.: 2:17-cv-03583-SVW-MRW

JOINT STIPULATION OF VOLUNTARY DISMISSAL AND PROPOSED CASE SCHEDULES

Assigned to Hon. Stephen V. Wilson
Department 10A

Complaint Filed: May 11, 2017

1 DEMETRIUS ALLEN, an individual;
2 MICHAEL PRUDHOMME, an
3 individual,

4 Plaintiffs,

5 v.

6 OPTIMUS PROPERTIES, LLC, a
7 California limited liability company;
8 ROXBURY VENTURES, LLC, a
9 California limited liability company;
10 NORMANDIE LINDEN, LLC, a
11 California limited liability company; and
12 JEROME MICKELSON, an individual,

13 Defendants.

CASE NO.: 2:17-cv-03584-SVW-
MRW

**JOINT STIPULATION OF
VOLUNTARY DISMISSAL AND
PROPOSED CASE SCHEDULES**

Assigned to Hon. Stephen V. Wilson
Department 10A

Complaint Filed: May 11, 2017

11 ARTHUR RIVERA, an individual;
12 JAMARCUS REYNOLDS, an
13 individual; STEP US ON SECOND
14 STREET, INC., a 501(c)(3) non-profit
15 organization,

16 Plaintiffs,

17 v.

18 OPTIMUS PROPERTIES, LLC, a
19 California limited liability company;
20 ROXBURY VENTURES, LLC, a
21 California limited liability company;
22 MARIPOSA/8TH STREET
23 PROPERTIES, LLC, a California
24 limited liability company; and JEROME
25 MICKELSON, an individual,

26 Defendants.

CASE NO.: 2:17-cv-03585-SVW-
MRW

**JOINT STIPULATION OF
VOLUNTARY DISMISSAL AND
PROPOSED CASE SCHEDULES**

Assigned to Hon. Stephen V. Wilson
Department 10A

Complaint Filed: May 11, 2017

22 PEDRO GUERRERO, an individual;
23 and SAJE, a 501(c)(3) non-profit
24 organization,

25 Plaintiffs,

26 v.

27 OPTIMUS PROPERTIES, LLC, a
28 California limited liability company;
ROXBURY VENTURES, LLC, a

(Caption continues on next page)

CASE NO.: 2:17-cv-03586-SVW-
MRW

**JOINT STIPULATION OF
VOLUNTARY DISMISSAL AND
PROPOSED CASE SCHEDULES**

Assigned to Hon. Stephen V. Wilson
Department 10A

1 California limited liability company;
2 MKM WESTWOOD, LLC, a California
3 limited liability company; and JEROME
MICKELSON, an individual,

4 Defendants.
5

6 ADDITIONAL COUNSEL

7 ANNE K. RICHARDSON (SBN 151541)

8 arichardson@publiccounsel.org

9 DEEPIKA SHARMA (SBN 256589)

10 dsharma@publiccounsel.org

11 SARAH E. TRUESDELL (SBN 258642)

12 truesdell.publiccounsel@gmail.com

13 PUBLIC COUNSEL

14 610 S. Ardmore Avenue

15 Los Angeles, California 90005

16 Telephone: (213) 385-2977

17 Facsimile: (213) 385-9089

18 CHRISTOPHER BRANCART (SBN 128475)

19 cbrancart@brancart.com

20 BRANCART & BRANCART

21 8205 Pescadero Road

22 Loma Mar, California 94021

23 Telephone: (650) 879-0141

24 Facsimile: (650) 879-1103

25 ANNE P. BELLOWS (SBN 293722)

26 abellows@publicadvocates.org

27 PUBLIC ADVOCATES INC.

28 131 Steuart Street, Suite 300

San Francisco, California 94105

Telephone: (415) 431-7430

Facsimile: (415) 431-1048

Attorneys for Plaintiffs

29 BARRY J. REAGAN (SBN 156095)

30 reagan@srllplaw.com

31 SLAUGHTER, REAGAN & COLE, LLP

32 625 E. Santa Clara Street, Suite 101

33 Ventura, California 93001

34 Telephone: (805) 658-7800

35 Facsimile: (805) 644-2131

Attorney for Defendants

1 **I. JOINT STIPULATION OF VOLUNTARY DISMISSAL OF MARTINEZ**
2 **V. OPTIMUS PROPERTIES, LLC, 2:16-CV-08598**

3 WHEREAS, in the case of *Cornelia Martinez, et al. v. Optimus Properties, et*
4 *al.*, No. 2:16-cv-08598-SVW-MRW (the “Initial Action”), Judge Wilson ordered
5 Plaintiffs to file, on or before May 12, 2017, separate complaints for each of the five
6 buildings in which the Plaintiffs reside (ECF No. 47); and

7 WHEREAS, on May 11, 2017, Plaintiffs filed five actions pursuant to Judge
8 Wilson’s order: *Martinez, et al. v. Optimus Properties, et al.*, No. 2:17-cv-03581-
9 SVW-MRW (1423 S. Magnolia); *Ramos, et al. v. Optimus Properties, et al.*, No.
10 2:17-cv-03582-SVW-MRW (756 S. Normandie); *Escamilla, et al. v. Optimus*
11 *Properties, et al.*, No. 2:17-cv-03583-SVW-MRW (250 S. Kenmore); *Allen, et al. v.*
12 *Optimus Properties, et al.*, No. 2:17-cv-03584-SVW-MRW (837 S. Normandie); and
13 *Rivera, et al. v. Optimus Properties, et al.*, No. 2:17-cv-03585-SVW-MRW (238 S.
14 Mariposa) (together, the “Original Buildings Actions”), as well as a sixth action,
15 *Guerrero, et al. v. Optimus Properties, et al.*, No. 2:17-cv-03586-SVW-MRW (401
16 S. Kenmore) (together with the Original Buildings Actions, the “Related Actions”);
17 and

18 WHEREAS, the Original Buildings Actions cover the same subject matter as
19 the Initial Action; and

20 WHEREAS, discovery requests have been propounded by the parties in the
21 Initial Action; and

22 WHEREAS, on July 11, 2017, the parties met and conferred pursuant to
23 Federal Rule of Civil Procedure 26(f) with respect to the Related Actions; and

24 WHEREAS, the parties agreed that the Initial Action is no longer necessary;
25 and

1 WHEREAS, the parties agreed that discovery requests propounded in the
2 Initial Action, and disputes related thereto, may proceed under any and all of those
3 Original Buildings Actions to which they pertain;

4 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the
5 parties, through their undersigned counsel, that, pursuant to Federal Rule of Civil
6 Procedure 41(a)(1)(ii), the Initial Action, entitled *Cornelia Martinez, et al. v.*
7 *Optimus Properties, et al*, No. 2:16-cv-08598-SVW-MRW, is dismissed without
8 prejudice, and that disputes over any discovery requests propounded under the Initial
9 Action may be disputed in any and all of the Initial Building Actions to which those
10 discovery requests pertain.

11 **II. JOINT STIPULATION REGARDING PROPOSED CASE SCHEDULES**

12 WHEREAS, the Court’s March 13, 2017 Minute Order in the Initial Action
13 following the New Case Status Conference (ECF 47 in the Initial Action) did not
14 specify case schedules beyond that of the Initial Action; and

15 WHEREAS, the Order Continuing Trial Date and Discovery Deadline, entered
16 on June 22, 2017 in the Initial Action and in each of the Related Actions (ECF 67 in
17 the Initial Action; ECF 17 in 1423 S. Magnolia; ECF 17 in 756 S. Normandie; ECF
18 18 in 250 S. Kenmore; ECF 18 in 837 S. Normandie; ECF 22 in 238 S. Mariposa;
19 and ECF 18 in 401 S. Kenmore), continued the original trial date and the discovery
20 deadline set in the March 13, 2017 Minute Order for the Initial Action; and

21 WHEREAS, at the July 11, 2017 conference between the parties with respect
22 to the Related Actions pursuant to Federal Rule of Civil Procedure 26(f), the parties
23 designated the trial date and discovery deadline set forth in the June 22, 2017 Order
24 as the trial date and discovery deadline for 1423 S. Magnolia, the first Related
25 Action filed, and agreed to a staggered schedule for the rest of the Related Actions;
26 and

27
28

1 WHEREAS, there is good cause for the entry of a staggered schedule in the
2 Related Actions, which is to allow the parties sufficient time to brief dispositive
3 motions in each of the six Related Actions, and to allow the Court sufficient time to
4 consider each such motion; and

5 WHEREAS, there is further good cause for the entry of a staggered schedule
6 in the Related Actions, which is to allow the parties time to properly consider the
7 sufficiency of the record for each individual action, and to have sufficient time to
8 exchange evidence and prepare for each individual trial before the beginning of trial
9 in each action;

10 NOW, THEREFORE, IT IS HEREBY ALSO STIPULATED that the case
11 schedules listed below will be operative.

12 So stipulated.

- 13 1. *Martinez, et al. v. Optimus Properties, et al.*, Case No. 2:17-cv-03581-
14 SVW MRW (1423 S. Magnolia):

15 ***Martinez, et al. v. Optimus Properties, et al.,***
16 **No. 2:17-cv-03581-SVW MRW**

Event	Proposed Date
Discovery begins	July 11, 2017
Supplement to initial disclosures	August 4, 2017
Initial expert disclosures and reports	September 29, 2017
Fact discovery cutoff	December 13, 2017
Rebuttal expert reports	December 20, 2017
Expert discovery cutoff	January 3, 2018
Summary judgment motion(s) filed	January 17, 2018
Summary judgment opposition(s) filed	February 5, 2018
Reply brief(s) filed in support of summary judgment	February 12, 2018
Hearing on motion(s) for summary judgment	February 26, 2018

Final pretrial conference	April 9, 2018
Trial begins	April 18, 2018

2. *Ramos, et al. v. Optimus Properties, et al.*, Case No. 2:17-cv-03582-SVW-MRW (756 S. Normandie):

<i>Ramos, et al. v. Optimus Properties, et al.</i> No. 2:17-cv-03582-SVW-MRW	
Event	Proposed Date
Discovery begins	July 11, 2017
Supplement to initial disclosures	August 4, 2017
Initial expert disclosures and reports	October 27, 2017
Fact discovery cutoff	January 10, 2018
Rebuttal expert reports	January 17, 2018
Expert discovery cutoff	January 31, 2018
Summary judgment motion(s) filed	February 14, 2018
Summary judgment opposition(s) filed	March 5, 2018
Reply brief(s) filed in support of summary judgment	March 12, 2018
Hearing on motion(s) for summary judgment	March 26, 2018
Final pretrial conference	May 7, 2018
Trial begins	May 16, 2018

3. *Escamilla, et al. v. Optimus Properties, et al.*, Case No. 2:17-cv-03583-SVW-MRW (250 S. Kenmore):

<i>Escamilla, et al. v. Optimus Properties, et al.</i> No. 2:17-cv-03583-SVW-MRW	
Event	Proposed Date
Discovery begins	July 11, 2017
Supplement to initial disclosures	August 4, 2017
Initial expert disclosures and reports	November 24, 2017

1	Fact discovery cutoff	February 7, 2018
2	Rebuttal expert reports	February 14, 2018
3	Expert discovery cutoff	February 28, 2018
4	Summary judgment motion(s) filed	March 14, 2018
5	Summary judgment opposition(s) filed	April 2, 2018
6	Reply brief(s) filed in support of summary judgment	April 9, 2018
7	Hearing on motion(s) for summary judgment	April 23, 2018
8	Final pretrial conference	June 4, 2018
9	Trial begins	June 13, 2018

10 4. *Allen, et al. v. Optimus Properties, et al.*, Case No. 2:17-cv-03584-
11 SVW-MRW (837 S. Normandie):

<i>Allen, et al. v. Optimus Properties, et al.</i> No. 2:17-cv-03584-SVW-MRW		
Event	Proposed Date	
14	Discovery begins	July 11, 2017
15	Supplement to initial disclosures	August 4, 2017
16	Initial expert disclosures and reports	December 22, 2017
17	Fact discovery cutoff	March 7, 2018
18	Rebuttal expert reports	March 14, 2018
19	Expert discovery cutoff	March 28, 2018
20	Summary judgment motion(s) filed	April 11, 2018
21	Summary judgment opposition(s) filed	April 30, 2018
22	Reply brief(s) filed in support of summary judgment	May 7, 2018
23	Hearing on motion(s) for summary judgment	May 21, 2018
24	Final pretrial conference	July 2, 2018
25	Trial begins	July 11, 2018

1 5. *Rivera, et al. v. Optimus Properties, et al.*, Case No. 2:17-cv-03585-
2 SVW-MRW (238 S. Mariposa):

3 ***Rivera, et al. v. Optimus Properties, et al.,***
4 **No. 2:17-cv-03585-SVW-MRW**

Event	Proposed Date
Discovery begins	July 11, 2017
Supplement to initial disclosures	August 4, 2017
Initial expert disclosures and reports	January 19, 2018
Fact discovery cutoff	April 4, 2018
Rebuttal expert reports	April 11, 2018
Expert discovery cutoff	April 25, 2017
Summary judgment motion(s) filed	May 9, 2018
Summary judgment opposition(s) filed	May 29, 2018
Reply brief(s) filed in support of summary judgment	June 4, 2018
Hearing on motion(s) for summary judgment	June 18, 2018
Final pretrial conference	July 30, 2018
Trial begins	August 8, 2018

17
18 6. *Guerrero, et al. v. Optimus Properties, et al.*, Case No. 2:17-cv-03586-
19 SVW-MRW (401 S. Kenmore):

20 ***Guerrero, et al. v. Optimus Properties, et al.,***
21 **No. 2:17-cv-03586-SVW-MRW**

Event	Proposed Date
Discovery begins	July 11, 2017
Supplement to initial disclosures	August 4, 2017
Initial expert disclosures and reports	February 16, 2018
Fact discovery cutoff	May 2, 2018
Rebuttal expert reports	May 9, 2018
Expert discovery cutoff	May 23, 2017

1	Summary judgment motion(s) filed	June 6, 2018
2	Summary judgment opposition(s) filed	June 26, 2018
3	Reply brief(s) filed in support of summary judgment	July 2, 2018
4	Hearing on motion(s) for summary judgment	July 16, 2018
5	Final pretrial conference	August 27, 2018
6	Trial begins	September 5, 2018

8 Respectfully submitted,
9

10 Dated: July 26, 2017

SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP

12 /s/ Emily Ludmir Aviad
13 Emily Ludmir Aviad

14 *I, Emily Ludmir Aviad, attest that all other*
15 *signatories listed, and on whose behalf the filing*
16 *is submitted, concur in the filing's content and*
17 *have authorized the filing.*

18 Matthew E. Sloan
19 Daniel O. Blau
20 Ross M. Cuff
21 Rachael T. Schiffman
22 Antonieta M. Pimienta

23 Dated: July 26, 2017

PUBLIC COUNSEL

24 /s/ Deepika Sharma
25 Anne K. Richardson
26 Deepika Sharma
27 Sarah E. Truesdell

28 Dated: July 26, 2017

BRANCART & BRANCART

/s/ Christopher Brancart
Christopher Brancart

1 Dated: July 26, 2017

PUBLIC ADVOCATES INC.

2

/s/ Anne P. Bellows

3

Anne P. Bellows

4

Attorneys for Plaintiffs

5

Dated: July 26, 2017

CITRON & CITRON ATTORNEYS AT LAW

6

/s/ Thomas H. Citron

7

Thomas H. Citron
Katherine Tatikian

8

Dated: July 26, 2017

SLAUGHTER, REAGAN & COLE, LLP

9

/s/ Barry J. Reagan

10

Barry J. Reagan

11

Attorneys for Defendants

12

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