

1 WHEREAS, on August 24, 2018, Defendant County of Riverside served on
2 Plaintiff A.A. an Offer of Judgment (“Offer”) in favor of Plaintiff A.A. and against
3 County of Riverside, and on August 30, 2018, Plaintiff A.A. accepted Defendant’s
4 offer;

5 NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

6 Plaintiff A.A. shall take judgment against Defendant County of Riverside in
7 this Action in exchange for the total sum of Forty Nine Thousand, Nine Hundred
8 and Ninety-Nine Dollars (\$49,999) as well as the dismissal of individually named
9 defendants Karla Torres and Felicia Butler and the dismissal with prejudice of this
10 entire Action.

11 This judgment shall be in full satisfaction of all federal and state law claims
12 and rights that A.A. may have to damages, or any other form of relief arising out
13 of the alleged acts or omissions of defendants County of Riverside or any official,
14 employee, or agent, either past or present, of the County of Riverside, or any
15 agency thereof, in connection with the facts and circumstances that are the subject
16 of this action. A.A. shall be deemed the prevailing party on her individual claims,
17 including her Monell claim.

18 This judgment shall not preclude A.A., as the prevailing party, from moving
19 the Court for an award of reasonable attorneys’ fees and costs incurred in the
20 pursuit of her individual claims, including Monell. Nor does this judgment
21 constitute a waiver of Defendants’ rights to oppose any such motion by A.A.’s
22 attorneys for their reasonable attorneys’ fees and costs incurred in pursuing the
23 case on behalf of A.A. Nothing in this offer or any of its provisions constitutes an
24 admission or acknowledgment by Defendants that A.A., as a prevailing party, is
25 entitled to any class related attorneys fees or costs, which A.A. contends she is
26 entitled to in connection with the pursuit of her individual claims, including *Monell*
27 claim.

28 This judgment was accepted within 14 days after service. This

1 judgment is made for the purposes specified in Rule 68 of the Federal Rules of
2 Civil Procedure and is not to be construed as an admission of liability by any
3 defendant, or any official, employee, or agent of the County of Riverside, or any
4 agency thereof; nor is it an admission that plaintiff has suffered any damages.


5 This judgment will act to release and discharge defendants County of
6 Riverside and Defendants Karla Torres and Felicia Butler; their successors or
7 assigns; and all past and present officials, employees, representatives and agents of
8 the County of Riverside, and/or any agency thereof, from any and all claims that
9 were or could have been alleged by A.A. in the above referenced action.

10 This judgment also will operate to waive plaintiffs rights to any claim for
11 interest on the amount of the judgment.

12 Plaintiff agrees that payment of \$49,999 within 60 days of the date of
13 acceptance of the offer shall be a reasonable time for such payment. Plaintiff shall
14 have 90 days from the entry of this judgment in which to file her motion for
15 fees and costs. Defendants' opposition will be due 30 days thereafter, and A.A.'s
16 Reply shall be due 30 days after Defendants' opposition.

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18 IT IS SO ORDERED

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20 DATED: September 17, 2018

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22 Hon. Virginia Phillips
23 CHIEF UNITED STATES DISTRICT JUDGE
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