

1 **THERESA A. GOLDNER, COUNTY COUNSEL**
2 **By: Marshall S. Fontes, Deputy (SBN 139567)**
3 **Kern County Administrative Center**
4 **1115 Truxtun Avenue, Fourth Floor**
5 **Bakersfield, CA 93301**
6 **Telephone 661-868-3800**
7 **Fax 661-868-3805**

8 **Attorneys for Defendants**
9 **County of Kern, Tanner Miller,**
10 **and Robert Reed**

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

13 **BRIAN DORA, JR., BRIAN DORA, SR.,**
14 **JAIME ALATORRE, RAUL**
15 **ALATORRE, GLORIA RAMIREZ,**
16 **DAVID RAMIREZ, ALEXANDRA**
17 **RAMIREZ AND ANDREA RAMIREZ,**

18 **Plaintiffs,**

19 **v.**

20 **COUNTY OF KERN, ROBERT REED,**
21 **TANNER MILLER and DOES 1 to 100,**
22 **inclusive,**

23 **Defendants.**

CASE NO.:
1:14-CV-00896-LJO-JLT

STIPULATION FOR PARTIAL
DISMISSAL OF CASE,
INCLUDING ALL CLAIMS OF
JAIME ALATORRE, RAUL
ALATORRE, GLORIA RAMIREZ,
DAVID RAMIREZ, ALEXANDRA
RAMIREZ AND ANDREA
RAMIREZ AGAINST
DEFENDANTS COUNTY OF
KERN TANNER MILLER AND
ROBERT REED; ORDER

Trial date: June 7, 2016
Time: 9:00 a.m.
Courtroom: 4

Complaint filed: June 11, 2014

24
25
26
27 **///**
28

1 **COME NOW**, Plaintiffs Gloria Ramirez, David Ramirez, Alexandra
2 Ramirez, Andrea Ramirez, Raul Alatorre and Jaime Alatorre, (hereinafter
3 “Stipulating Plaintiffs”) through their counsel of record John A. Tello, of the Law
4 Firm of Rodriguez and Associates, and Defendants County of Kern, Tanner Miller
5 and Robert Reed (hereinafter collectively “County Defendants”) through their
6 counsel of record Marshall S. Fontes of Kern County Counsel’s Office, and
7 provide as follows:

8 **IT IS HEREBY STIPULATED**, by and between the STIPULATING
9 PLAINTIFFS and the COUNTY DEFENDANTS in this action through their
10 designated counsel, that any and all claims of the STIPULATING PLAINTIFFS
11 in above-captioned action be dismissed with prejudice in their entirety as to any
12 complaint, allegation and/or cause of action held by the STIPULATING
13 PLAINTIFFS against the COUNTY DEFENDANTS, and more specifically that
14 dismissal may be entered in favor of the COUNTY DEFENDANTS and against
15 each of the STIPULATING PLAINTIFFS

16 **IT IS FURTHER STIPULATED** that the aforementioned dismissal is in
17 consideration of a resolution of the matter by the STIPULATING PLAINTIFFS
18 and the COUNTY DEFENDANTS, and that each of said parties hereby agree to
19 bear all of its/their own costs and attorney’s fees with respect to the litigation.

20 IT IS FURTHER STIPULATED that the aforementioned dismissal and
21 agreement will have no effect on nor prejudice against the non-settling plaintiffs,
22 Brian Dora, Sr. and Brian Dora, Jr, and their claims against the COUNTY
23 DEFENDANTS

24 Dated: July 6, 2015

RODRIGUEZ AND ASSOCIATES

25
26 By: /s/ John A. Tello .

27 John A. Tello, Esq.

28 Attorney for Plaintiffs, Brian Dora, Jr.,
Brian Dora, Sr., Gloria Ramirez, David

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Ramirez, Alexandra Ramirez, Andrea Ramirez, Raul Alatorre and Jaime Alatorre

Dated: July 9, 2015

THERESA A. GOLDNER, COUNTY COUNSEL

By: /s/ Marshall S. Fontes
Marshall S. Fontes, Deputy
Attorneys for Defendants, County of Kern,
Robert Reed and Tanner Miller

ORDER

IT IS SO ORDERED.

Dated: July 13, 2015

/s/ Lawrence J. O'Neill
UNITED STATES DISTRICT JUDGE