

1 Mark E. Merin (State Bar No. 043849)
Paul H. Masuhara (State Bar No. 289805)

2 **LAW OFFICE OF MARK E. MERIN**

3 1010 F Street, Suite 300
Sacramento, California 95814
4 Telephone: (916) 443-6911
Facsimile: (916) 447-8336
5 E-Mail: mark@markmerin.com
paul@markmerin.com

6 Attorneys for Plaintiffs

7 MARVIN SHADD, ORLINDO MYLES, CARL C. RANDOLPH, VERNON TIDWELL, JOSEPH
ANTHONY NUÑEZ, GAGE QUINONES, TYLER COSTA, MARQUISE ZEIGLER, RENEE
8 DELGADO, ROBERT REMEL, ANGELO MARTINEZ, STEPHEN BAUMANN, TONY JIMENEZ,
SAGE LOPEZ, MELOSHA FIELDS, MELVIN FIELDS, DALE GROSSER, GUILLERMO RICHARD
9 RUIZ, TRAVIS FORD, ALICIA KAFKA, QUIONA LIM, EMMANUEL RODRIGUEZ, ERIN
CRAWFORD, and BILLY NELSON

10 **P O R T E R | S C O T T**

A PROFESSIONAL CORPORATION

11 Derek J. Haynes, SBN 264621
350 University Ave., Suite 200
12 Sacramento, California 95825
TEL: 916.929.1481
13 FAX: 916.927.3706

14 Attorneys for Defendants

COUNTY OF SACRAMENTO and VERNE SPEIRS

15 RIVERA & ASSOCIATES

16 2180 Harvard Street, Suite 310
Sacramento, California 95815
17 Tel: 916-922-1200 Fax: 916 922-1303
Jesse M. Rivera, SBN 84259
18 Jonathan B. Paul, SBN 215884
Jill B. Nathan, SBN 186136

19 Attorneys for Defendants

20 JAMES TERRELL, JOSE CERVANTES, RONALD PARKER, MARCOS DIAZ, DARLISHA
WILBON, JOSEPH KURYLLO, ADAM FRAZIER, CARLOS SMITH, JAVIER ARROYO, SEAN
21 HACKETT, MICHAEL OCAMPO, ANDREW YOUNG, FRANCISCO RECINOS, CARL BALLS, and
RONALD EARP

22 UNITED STATES DISTRICT COURT
23 EASTERN DISTRICT OF CALIFORNIA
24 SACRAMENTO DIVISION

25 MARVIN SHADD, et al.

26 Plaintiffs,

27 vs.

28 COUNTY OF SACRAMENTO, et al.,

Defendants.

Consolidated Case No. 2:12-cv-002834-MCE-KJN

**JOINT REQUEST FOR ORDER GRANTING
STIPULATION FOR DISMISSAL; ORDER
THEREON**

1	TYLER COSTA, et al.
2	Plaintiffs,
3	vs.
4	COUNTY OF SACRAMENTO, et al.,
5	Defendants.
6	MELOSHA FIELDS, et al.
7	Plaintiffs,
8	vs.
9	COUNTY OF SACRAMENTO, et al.,
10	Defendants.
11	TRAVIS FORD, et al.
12	Plaintiffs,
13	vs.
14	COUNTY OF SACRAMENTO, et al.,
15	Defendants.

Consolidated Case No. 2:12-cv-002834-MCE-KJN

JOINT REQUEST FOR ORDER GRANTING STIPULATION FOR DISMISSAL; ORDER THEREON

Consolidated Case No. 2:12-cv-002834-MCE-KJN

JOINT REQUEST FOR ORDER GRANTING STIPULATION FOR DISMISSAL; ORDER THEREON

Consolidated Case No. 2:12-cv-002834-MCE-KJN

JOINT REQUEST FOR ORDER GRANTING STIPULATION FOR DISMISSAL; ORDER THEREON

On January 28, 2015, counsel for all parties to this litigation, which consists of four consolidated actions, convened for a day-long mediation before the Honorable Raul A. Ramirez (ret.). Terms of a settlement agreement and release were successfully negotiated through the mediation; however, the settlement was contingent upon the County of Sacramento Board of Supervisor’s approval and plaintiffs’ counsel obtaining the signatures and releases of all plaintiffs to these consolidated actions.

On February 24, 2015, the County of Sacramento Board of Supervisors approved the terms of the parties’ negotiated settlement.

During the months of February and March, plaintiffs’ counsel searched for and located the several plaintiffs to these actions, including some plaintiffs who resided or were incarcerated out-of-state, for the purpose of obtaining their consent to the terms of the negotiated settlement.

On April 3, 2015, the terms of the contingent settlement agreement between the parties were satisfied, and the settlement agreement was entered. A stipulation for dismissal was drafted and distributed to all parties’ counsel for permission to sign and file.

On April 5, 2015, plaintiffs’ counsel obtained permission to file, and did file, a stipulation for dismissal of these four consolidated actions, pursuant to the terms of the negotiated settlement and

1 Federal Rule of Civil Procedure 41(a)(1)(A)(ii). (*See* ECF Doc. 83.)

2 Because all claims have been resolved through the settlement agreement, the parties respectfully
3 request that this Court order the parties' stipulation for dismissal effective and close this matter.

4 Dated: April 8, 2015

Respectfully Submitted,
LAW OFFICE OF MARK E. MERIN

5 /s/ Mark E. Merin

6 By: _____
7 Mark E. Merin

8 Attorney for Plaintiffs
9 MARVIN SHADD, ORLINDO MYLES, CARL C.
10 RANDOLPH, VERNON TIDWELL, JOSEPH
11 ANTHONY NUÑEZ, GAGE QUINONES, TYLER
12 COSTA, MARQUISE ZEIGLER, RENEE
13 DELGADO, ROBERT REMEL, ANGELO
14 MARTINEZ, STEPHEN BAUMANN, TONY
15 JIMENEZ, SAGE LOPEZ, MELOSHA FIELDS,
16 MELVIN FIELDS, DALE GROSSER, GUILLERMO
17 RICHARD RUIZ, TRAVIS FORD, ALICIA KAFKA,
18 QUIONA LIM, EMMANUEL RODRIGUEZ, ERIN
19 CRAWFORD, and BILLY NELSON

14 Dated: April 8, 2015

Respectfully Submitted,
P O R T E R | S C O T T

16 /s/ Derek J. Haynes
17 (as authorized on April 8, 2015)

18 By: _____
19 Derek J. Haynes

20 Attorney for Defendants
21 COUNTY OF SACRAMENTO and VERNE SPEIRS

21 Dated: April 8, 2015

Respectfully Submitted,
RIVERA & ASSOCIATES

22 /s/ Jesse M. Rivera
23 (as authorized on April 8, 2015)

24 By: _____
25 Jesse M. Rivera


26 Attorney for Defendants
27 JAMES TERRELL, JOSE CERVANTES, RONALD
28 PARKER, MARCOS DIAZ, DARLISHA WILBON,
JOSEPH KURYLLO, ADAM FRAZIER, CARLOS
SMITH, JAVIER ARROYO, SEAN HACKETT,
MICHAEL OCAMPO, ANDREW YOUNG,
FRANCISCO RECINOS, CARL BALLS, and
RONALD EARP

1 **ORDER**

2 GOOD CAUSE APPEARING, and in accordance with the foregoing stipulation of the parties, the
3 Court hereby GRANTS the parties' stipulation for dismissal, filed with this Court on April 6, 2015, and
4 further ORDERS that these four consolidated cases be dismissed. The Clerk of Court is ordered to close
5 the file.

6 IT IS SO ORDERED.

7 Dated: April 9, 2015

8 
9 _____
10 MORRISON C. ENGLAND, JR., CHIEF JUDGE
11 UNITED STATES DISTRICT COURT
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28