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11 Attorneys for Plaintiffs,

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

15 SARA ADAM, et al.,

16 Plaintiffs,

17 vs.

18 BRET BRZYSCZ, CITY OF
ROSEVILLE, COUNTY OF PLACER,
19 COUNTY OF SACRAMENTO, and
DOES 1 THROUGH 50,

20
21 Defendants.

No.: 2:14-cv-02795 WBS CKD

**JOINT STIPULATION TO DISMISS
CERTAIN CLAIMS BY PLAINTIFFS
AGAINST COUNTY OF SACRAMENTO;
ORDER THEREON**

22
23 WHEREAS plaintiffs SARA ADAM, JESSE HEREDIA, ISABELLA H., MYA H.,
24 MARGARITA YDROGO, JOSEFA DURAN, GRACE DURAN, CATRINA RODRIGUEZ,
25 ANTONIO DURAN, ANITA FELIX, JOSE FELIX, ALEX FELIX III, GISELLE F., AIDEN F.,
26 PENELOPE F., JORGE CAMPOS, ALEXIS SANDOVAL, ALIZZA MARES, DAVINA
27 SANCHEZ, JUAN SANCHEZ, MIKKAYLA GUTIERREZ, SANTINO S., JULIAN S.,
28 DESTINY C., DANNY GARCIA and SAMUEL DURAN filed a Complaint against defendant

1 COUNTY OF SACRAMENTO on November 29, 2014, alleging constitutional violations rising
2 from the execution of search warrants at several residences;

3 WHEREAS, the parties presently agree that employees of the County of Sacramento
4 participated in the execution of a search warrant at only one of the locations referenced in the
5 Complaint, namely, 5612 Forestwood Drive in Sacramento County;

6 WHEREAS, the only plaintiffs who were at 5612 Forestwood Drive at the time of the
7 search were SARA ADAM, JESSE HEREDIA, ISABELLA H., and MYA H.;

8 WHEREAS the parties agree that none of the additional plaintiffs, other than those located
9 at 5612 Forestwood Drive, have any claims against defendant County of Sacramento; and

10 WHEREAS, the parties wish to narrow the claims and issues in this matter in order to
11 avoid unnecessary, costly, and time-consuming discovery and motions practice;

12
13 THEREFORE, the parties hereby stipulate, by and through their counsel of record, as
14 follows:

15 1. All claims in the Complaint, brought against the County of Sacramento by
16 plaintiffs who were not present at the 5612 Forestwood Drive address, shall be dismissed without
17 prejudice;

18 2. The plaintiffs dismissing without prejudice the claims alleged in the Complaint
19 against the County of Sacramento are:

- 20 (1) Margarita Ydrogo
- 21 (2) Josefa Duran, by and through her power of attorney, Grace Duran
- 22 (3) Grace Duran
- 23 (4) Catarina Rodriguez
- 24 (5) Antonio Duran
- 25 (6) Anita Felix
- 26 (7) Jose Felix
- 27 (8) Alex Felix III
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- (9) Aiden F., by and through his father Alex Felix
- (10) Penelope F., by and through her father Alex Felix
- (11) Jorge Campos
- (12) Alexis Sandoval
- (13) Alizza Mares
- (14) Davina Sanchez
- (15) Juan Sanchez
- (16) Mikkayla Gutierrez
- (17) Santino S., by and through his mother Davina Sanchez
- (18) Julian S., by and through his mother Davina Sanchez
- (19) Destiny C., by and through her mother Davina Sanchez
- (20) Danny Garcia
- (21) Samuel Duran

3. The following plaintiffs continue to assert claims against the County of Sacramento:

- (1) Sara Adam
- (2) Jesse Heredia
- (3) Isabella H.
- (4) Mya H.

IT IS SO STIPULATED.

DATE: December 16, 2015

/s/ Alexander L. Nowinski
ROBERT L. CHALFANT
ALEXANDER L. NOWINSKI
CREGGER & CHALFANT LLP
Attorneys for Defendant COUNTY OF
SACRAMENTO

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DATE: December 17, 2015

/s/ Loren L. Lunsford
LOREN L. LUNSFORD
AMBER LUNSFORD
Attorneys for Plaintiffs SARA ADAM, JESSE
HEREDIA, ISABELLA H., MYA H.,
MARGARITA YDROGO, JOSEFA DURAN,
GRACE DURAN, CATRINA RODRIGUEZ,
ANTONIO DURAN, ANITA FELIX, JOSE FELIX,
ALEX FELIX III, GISELLE F., AIDEN F.,
PENELOPE F., JORGE CAMPOS, ALEXIS
SANDOVAL, ALIZZA MARES, DAVINA
SANCHEZ, JUAN SANCHEZ, MIKKAYLA
GUTIERREZ, SANTINO S., JULIAN S.,
DESTINY C., DANNY GARCIA and SAMUEL
DURAN

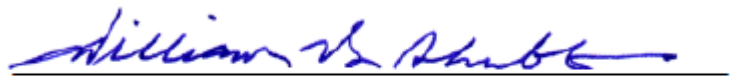
ORDER

After considering the stipulation by and between the parties through their counsel of record, the Court orders that:

1. The claims against the County of Sacramento brought by plaintiffs Margarita Ydrogo; Josefa Duran, by and through her power of attorney, Grace Duran; Grace Duran; Catarina Rodriguez; Antonio Duran; Anita Felix; Jose Felix; Alex Felix III; Aiden F., by and through his father Alex Felix; Penelope F., by and through her father Alex Felix; Jorge Campos; Alexis Sandoval; Alizza Mares; Davina Sanchez; Juan Sanchez; Mikkayla Gutierrez; Santino S., by and through his mother Davina Sanchez; Julian S., by and through his mother Davina Sanchez; Destiny C., by and through her mother Davina Sanchez; Danny Garcia; and Samuel Duran are DISMISSED WITHOUT PREJUDICE.

IT IS SO ORDERED.

Dated: December 21, 2015


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE