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5 Attorney for Plaintiff

6 UNITED STATES DISTRICT COURT

7  
8 EASTERN DISTRICT OF CALIFORNIA

9 MICHELLE A. CAVEN,

10 Plaintiff,

11 vs.

12 AUTOTIME MOTORS; JEFFREY  
13 ERCOLINI; KELLY ERCOLINI; CREDIT  
ACCEPTANCE CORPORATION;  
14 AMERICAN SAFETY CASUALTY  
INSURANCE COMPANY

15 Defendants.  
16

Case No. 2:15-cv-00295-WBS-EFB

**JOINT NOTICE REGARDING  
SETTLEMENT AND REQUEST TO  
RETAIN JURISDICTION; [~~PROPOSED~~]  
ORDER**

Compl. Filed: February 4, 2015  
Trial Date: None set

The Honorable Edmund F. Brennan

17 **NOTICE OF SETTLEMENT**

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19  
20 Plaintiff MICHELLE A. CAVEN, and Defendant CREDIT ACCEPTANCE  
21 CORPORATION, (hereafter the Parties) by and through their counsel of record, hereby notify  
22 the Court that the Parties have reached a settlement in the above-entitled matter. The Parties  
23 hereby request that the Court vacate all pending due dates and hearings pertaining to Defendant  
24 CREDIT ACCEPTANCE CORPORATION (hereafter "CAC") only and retain jurisdiction over  
25 this case until Defendant CAC can fully perform its duties as required under the settlement  
26 agreement. It is estimated that Defendant CAC will fully perform its duties on or around June  
27 18th, 2015. Upon Defendant CAC's completion of its duties (as mandated under the settlement  
28

1 agreement) and within two weeks after said completion, Plaintiff will file with this Court a joint  
2 notice of dismissal with prejudice to be signed by counsel for the Parties.  
3

4 **Respectfully Submitted,**  
5

6 DATED: May 20, 2015

REED SMITH LLP

7  
8 By           /s/ Cristyn N. Chadwick          

9 Abraham J. Colman  
10 Cristyn N. Chadwick  
11 Attorneys for Defendant Credit Acceptance  
12 Corporation

13  
14 DATED: May 20, 2015

DEOS LAW, PC

15 By           /s/ Linda Deos          

16 Linda Deos  
17 Attorneys for Plaintiff Michelle A. Caven  
18

**ORDER**

19 Pursuant to the foregoing Stipulation, and good cause appearing, all dates and hearings  
20 pertaining to Defendant CAC only are hereby vacated. Within 20 days from the date this Order  
21 is filed, counsel for plaintiff shall file a joint notice of dismissal with prejudice signed by counsel  
22 for the parties. This court will retain jurisdiction over this matter for 120 days from the date of  
23 this Order to allow for defendant CAC to fulfill its duties under the settlement agreement.  
24

**IT IS SO ORDERED.**

25 Dated: May 20, 2015

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28 **WILLIAM B. SHUBB**  
**UNITED STATES DISTRICT JUDGE**