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6 Attorneys for Plaintiff I.F.

7 **UNITED STATES DISTRICT COURT**  
 8 **EASTERN DISTRICT OF CALIFORNIA**

9 I.F., by and through her guardian ad litem )  
 10 SHASTA SKINNER, individually and as )  
 11 successor-in-interest to Decedent )  
 12 RONELL FOSTER; R.F., by and through )  
 13 his guardian ad litem SHENA BATTEN, )  
 14 individually and as successor-in-interest to )  
 Decedent RONELL FOSTER; PAULA )  
 MCGOWAN, individually; and RONELL )  
 FOSTER, SR., individually. )

15 Plaintiffs,

16 vs.

17 CITY OF VALLEJO, a municipal )  
 18 corporation; RYAN MCMAHON, )  
 19 individually and in his official capacity as )  
 a Police Officer for the CITY OF )  
 VALLEJO; and DOES 1-50, inclusive. )

20 Defendants.  
 21 \_\_\_\_\_ )

CAND No: 20-mc-80075-LB  
 CAED No: 2:18-cv-00673-JAM-CKD

**NOTICE OF CONDITIONAL  
 SETTLEMENT AND STIPULATION  
 BETWEEN PLAINTIFFS AND THE  
 CITY OF VALLEJO, AND ORDER,  
 FOR MAGISTRATE JUDGE LAUREL  
 BEELER'S EXERCISE OF  
 JURISDICTION TO RESOLVE  
 REMAINDER OF CASE**

1 [Plaintiffs' Statement preceding stipulation]: TO THE COURT AND PARTIES, please take  
2 notice that the parties have reached a conditional settlement agreement, discussed below. All Plaintiffs  
3 and the City of Vallejo have further stipulated to Magistrate Judge Laurel Beeler to exercise jurisdiction  
4 to resolve the minors' compromises and enforce the settlement, as set forth below. The City of Vallejo  
5 and its risk management authority will be paying all settlement funds. Bruce Kilday, counsel for  
6 Defendant Ryan McMahon, has not responded to multiple requests to respond to this stipulation.  
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9 **STIPULATION BETWEEN ALL PLAINTIFFS AND DEFENDANT CITY OF VALLEJO**

10 The parties participated in a settlement conference before Magistrate Judge Laurel Beeler on July  
11 21, 2020, and have continued settlement discussions. The parties have reached an agreement to settle this  
12 matter, subject to approval by the California Joint Powers Risk Management Board of Directors. To  
13 conserve the time and resources of this Court, the parties hereby consent that Judge Beeler shall exercise  
14 jurisdiction to resolve the forthcoming motions to approve minors' compromises for the minor Plaintiffs,  
15 and to enforce the settlement, and the parties hereby consent to Magistrate Judge Beeler's exercise of  
16 jurisdiction over this matter for all purposes related to the settlement. If the settlement is not approved,  
17 the case will revert back to the jurisdiction of Judge John A. Mendez for remaining proceedings, including  
18 trial. Judge Beeler has agreed to accept jurisdiction of this matter for settlement and post-settlement  
19 matters, to conserve the time and resources of this Court. The parties request that all dates in this matter  
20 be vacated and the Court issue a 90-day conditional dismissal, to permit the parties to execute appropriate  
21 settlement releases and documents, to permit Judge Beeler to hear and decide the motions to approve  
22 minor's compromises, and for Defendants to issue settlement checks. If the matter is not resolved, Judge  
23 Beeler shall remand the matter back to the jurisdiction of Judge A. Mendez for further proceedings.  
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1 DATED: July 30, 2020

HADDAD & SHERWIN LLP

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3 /s/ Julia Sherwin  
4 JULIA SHERWIN  
Attorneys for Plaintiff I.F.

5 DATED: July 30, 2020

LAW OFFICE OF JOHN L. BURRIS

6  
7 /s/ John L. Burris  
8 JOHN L. BURRIS  
9 Attorney for Plaintiffs, R.F.,  
PAULA MCGOWAN,  
and RONELL FOSTER, SR.

10  
11 DATED: July 30, 2020

POINTNER & BUELNA LLP

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13 /s/ Adante D. Pointer  
14 ADANTE D. POINTER  
15 PATRICK BUELNA  
16 Attorney for Plaintiffs, R.F.,  
17 PAULA MCGOWAN,  
and RONELL FOSTER, SR.

18 DATED: August 3, 2020

ALLEN, GLAESSNER, HAZELWOOD, WERTH

19 /s/ Dale L. Allen, Jr.  
20 DALE L. ALLEN, JR.  
21 JOHN ROBINSON  
22 Attorneys for Defendants City of Vallejo  
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1 **ORDER**

2 Based on the Plaintiffs' and City of Vallejo's stipulation, and with good cause appearing therefore,  
3 IT IS SO ORDERED. United States Magistrate Judge Laurel Beeler shall exercise jurisdiction over this  
4 matter for all purposes concerning settlement, including resolution of the motions to approve minors'  
5 compromises, and enforcing any settlement. All dates in this matter will be vacated and a conditional  
6 dismissal will be set for 90 days to permit the parties to execute appropriate settlement releases and  
7 documents, to permit the court to hear and decide motions to approve the minors' compromises, and for  
8 Defendants to issue checks.  
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11 DATED: August 4, 2020

/s/ John A. Mendez

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13 HON. JOHN A. MENDEZ  
14 United States District Court Judge  
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