Richard A. Madsen, Jr. (SBN 146174) MADSEN LAW FIRM 551 Hartz Avenue, Suite B Danville, California 94526 Telephone: (925) 837-0900 Facsimile: (925) 837-0905 Email: Rick@MadsenLawFirm.com Attorney for Plaintiff, Natalie Sramek	
UNITED STATES DISTRICT COURT	
IN THE NORTHERN DISTRICT OF CALIFORNIA	
Natalie Sramek, Case No.: 15-cv-04873-HSG	
JOINT STATUS REPORT Plaintiff,	
vs.	
California Highway Patrol ("CHP"); CHP Commissioner Joseph Farrow; CHP Officer Sean Harrington; CHP Officer Robert Hazelwood; individually and in their official capacities as peace officers; and DOES 1-100,	
Defendants/	
Pursuant to the Court's order on June 10, 2016, the parties hereby the following Joint Status Report:	v submit
1. The parties are in the process of finalizing their global settle	ment to
resolve the claims of all plaintiffs against all defendants in the instant matter, an	d in the
related matter (Vogt vs. California Highway Patrol, et al., Case No. 15-cv-05199)-HSG).
2. A formal settlement agreement/release was drafted by de	efendant
California Highway Patrol and circulated between the parties and their re	spective
counsel for review, modification, approval, and execution. All settlement do	cuments

Dockets.Justia.com

have now been executed by plaintiffs and submitted to the Office of the Attorney General for processing.

3. The parties request the Court vacate the CMC scheduled for August 16th, 2016 (and other related deadlines), and grant an additional 45-60 days for the finalization of the settlement, receipt of settlement funds, and the anticipated filing of a Stipulated Dismissal – OR – for the filing of a further updated Joint Status Report if there is any additional delay.

Respectfully submitted,

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

21

22

23

24

25

26

Dated: August 9, 2016

By: <u>/s/ Richard A. Madsen, Jr.</u>____

Richard A. Madsen, Jr., Esq. Attorney at Law Madsen Law Firm 551 Hartz Avenue, Ste. B Danville, CA 94526 Telephone: (925) 837-0900 Facsimile: (925) 837-0905 Email: Rick@MadsenLawFirm.com

19 Attorney for PlaintiffNatalie Sramek

By: /s/ Wil Fong

Wil Fong, Esq. Deputy Attorney General Office of the Attorney General 1515 Clay Street, 20th Floor Oakland, CA 94612-0550 Telephone: (510) 622-2114 Facsimile: (510) 622-2121 Email: Wil.Fong@doj.ca.gov

Attorney for Defendant California Highway Patrol

PURSUANT TO STIPULATION, IT IS SO ORDERED.

The CMC scheduled for August 16, 2016, is vacated. The parties are directed to file an updated Joint Status Report of no more than two pages on or before <u>September 23</u>, 2016, in the event a Stipulation of Dismissal has not been filed in advance of that date.

27 Dated: _____ August 9, 2016 28

Honorable Haywood S. Gilliam.

Joint Status Report - 2 CASE NO. 15-cv-04873-HSG