

1 ACLU FOUNDATION  
OF SOUTHERN CALIFORNIA  
2 Peter Bibring (SBN 223981)  
pbibring@aclu-sc.org  
3 Mark Rosenbaum (SBN 59940)  
mrosenbaum@aclu-sc.org  
4 Peter J. Eliasberg (SBN 189110)  
peliasberg@aclu-sc.org  
5 1313 West Eighth Street  
Los Angeles, California 90017  
6 Telephone: (213) 977-9500  
Facsimile: (213) 977-5297  
7

8 SEYFARTH SHAW LLP  
Stacy Shartin (SBN 58281)  
sshartin@seyfarth.com  
9 Rishi Puri (SBN 252718)  
rpuri@seyfarth.com  
10 2029 Century Park East, Suite 3500  
Los Angeles, California 90067-3021  
11 Telephone: (310) 277-7200  
Facsimile: (310) 201-5219  
12

13 Attorneys for Plaintiffs  
KEVON GORDON, RONALD JONES  
RAYMOND BARNES and QUINCY BROWN  
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15 UNITED STATES DISTRICT COURT  
16 CENTRAL DISTRICT OF CALIFORNIA – EASTERN DIVISION  
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18 KEVON GORDON, RONALD JONES )  
RAYMOND BARNES and QUINCY )  
19 BROWN, )  
20 Plaintiffs, )  
21 v. )  
22 CITY OF MORENO VALLEY. et al, )  
23 Defendants. )  
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No. ED CV 09-00688 JZ (SSx)  
**STIPULATION AND [PROPOSED]  
ORDER RE SETTLEMENT  
BETWEEN PLAINTIFFS AND  
COUNTY DEFENDANTS**  
Judge: Hon. Jack Zouhary  
Courtroom: 1  
Complaint Filed: April 9, 2009

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**STIPULATION**

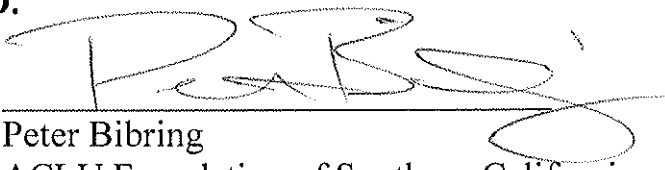
WHEREAS Plaintiffs Kevon Gordon, Ronald Jones, Raymond Barnes, and Quincy Brown (Plaintiffs), and Defendants County of Riverside, Stan Sniff, Rick Hall, Eric Brewer, Anthony Johnson, Seth Hartnet, Robert Duckett, Mario Herrera, Richard Hutson, and Christopher Gastinger (County Defendants) have entered into a settlement and Plaintiffs have executed a Full Release of Claims, a copy of which is attached as Exhibit 1 (Release);

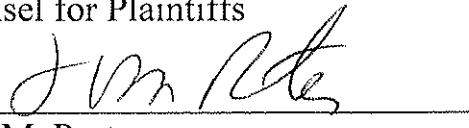
Plaintiffs and County Defendants stipulate and agree that the settlement amount is intended to be in settlement of County Defendants' proportionate share of Plaintiffs' overall damages in this action. See *McDermott, Inc. v. AmClyde*, 511 U.S. 202, 204 (1994); *Franklin v. Kaypro Corp.*, 884 F.2d 1222, 1229-32 (9th Cir. 1989); *Restatement (Third) of Torts* §16 [Apportionment of Liability] (2000);

The settlement and Release are contingent on the Court approving this Stipulation and ordering that following any future award of damages in this action, no other Defendant may seek contribution from County Defendants, or any offset from final damages awarded to Plaintiffs;

The Court shall retain jurisdiction for four years after the date of this settlement to enforce the terms of the Release.

**IT IS SO STIPULATED.**

Dated: 11-3-2010   
Peter Bibring  
ACLU Foundation of Southern California  
Counsel for Plaintiffs

Dated: 11-2-2010   
John M. Porter  
Lewis Brisbois Bisgaard & Smith LLP  
Counsel for defendants County of Riverside, Stan Sniff, Rick Hall, Eric Brewer, Anthony Johnson, Seth Hartnet, Robert Duckett, Mario Herrera, Richard Hutson, and Christopher Gastinger (Defendants).