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**FILED**  
**JUN 23 2003**  
CLERK, U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION AT SANTA ANA  
BY *[Signature]* DEPUTY

6 Steven C. Miller, Esq. [State Bar No. 112951]  
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9 Santa Ana, California 92702-1379  
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**LODGED**  
**6-20-03**  
**JUN 20 2003**  
**UNITED STATES DISTRICT COURT**  
CLERK, U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION AT SANTA ANA  
**CENTRAL DISTRICT OF CALIFORNIA**  
BY *[Signature]* DEPUTY

11 Attorneys for Defendants,  
12 COUNTY OF ORANGE and SHERIFF JIM ZHANG. CARONA

15 FRED PIERCE, TIMOTHY LEE CONN, )  
MAX SANDERS, FERMIN VALENZUELA, )  
16 LAURIE D. ELLERSTON, STEVEN )  
GRAHAM, JEFF MORGAN, )  
17 Individually, and as a Class )  
Representative, and all those )  
18 similarly situated, )  
19 Plaintiffs, )  
20 vs. )  
21 )  
22 COUNTY OF ORANGE, a Governmental )  
Entity; MICHAEL S. CARONA, )  
23 Individually; and DOES 1 through )  
200, Inclusive, )  
24 )  
25 Defendants. )

Case No. SACV 01-981 GLT(MLGx)

**STIPULATION TO DISMISS  
PLAINTIFF FRED PIERCE'S "OVER-  
DETENTION CLAIM"; [PROPOSED]  
ORDER**

Discovery Cut-Off: 12/05/03  
Pre-Trial Conference: 03/05/04  
Trial Date: Not Scheduled

**MATTER FOR DETERMINATION BY THE  
HONORABLE GARY L. TAYLOR**

**ENTER ON ICMS**  
**JUN 24 2003**  
*[Signature]*

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**STIPULATION**

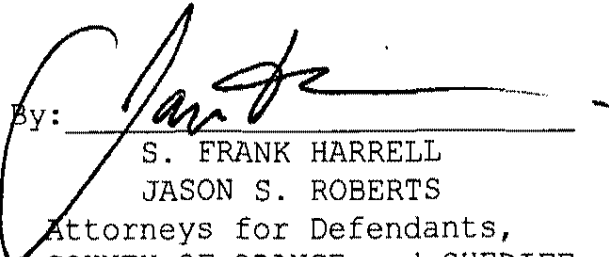
IT IS HEREBY STIPULATED BY AND AMONG ALL PARTIES as follows:

Plaintiff Fred Pierce hereby agrees to dismiss his over-detention claim against all Defendants in this matter. In the context of this litigation, the parties agree that the term over-detention means an unreasonable delay in the release of an "inmate", which in the case of Plaintiff Pierce means "pre-trial detainee."

**IT IS SO STIPULATED.**

Dated: ~~May~~ <sup>JUNE</sup> 19, 2003

FRANSELL, STRICKLAND, ROBERTS & LAWRENCE

By:   
S. FRANK HARRELL  
JASON S. ROBERTS  
Attorneys for Defendants,  
COUNTY OF ORANGE and SHERIFF  
MICHAEL S. CARONA

Dated: May \_\_, 2003

LITT & ASSOCIATES

By: \_\_\_\_\_  
BRYAN B. MILLER  
Attorneys for Plaintiffs

Jun-16-03 08:50am From-F S R L 714 456 0181 T-556 P.003/004 F-502

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STIPULATION

IT IS HEREBY STIPULATED BY AND AMONG ALL PARTIES as follows:

Plaintiff Fred Pierce hereby agrees to dismiss his over-detention claim against all Defendants in this matter. In the context of this litigation, the parties agree that the term over-detention means an unreasonable delay in the release of an "inmate", which in the case of Plaintiff Pierce means "pre-trial detainees."

IT IS SO STIPULATED.

Dated: May \_\_, 2003

FRANSCCELL, STRICKLAND, ROBERTS & LAWRENCE

By: \_\_\_\_\_  
S. FRANK HARRELL  
JASON S. ROBERTS  
Attorneys for Defendants,  
COUNTY OF ORANGE and SHERIFF  
MICHAEL S. CARONA

Dated: <sup>June</sup> ~~May~~ 19, 2003

LITT & ASSOCIATES

By: Bryan B. Miller  
BRYAN B. MILLER  
Attorneys for Plaintiffs

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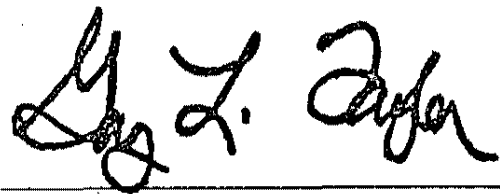
[REPOSED] ORDER

Based on the stipulation of the parties and good cause appearing therefore, the Court now rules as follows:

Plaintiff Fred Pierce's over-detention claim, as defined by the parties, is hereby dismissed against all Defendants.

**IT IS SO ORDERED.**

DATED: June 23, 2003



\_\_\_\_\_  
Honorable Gary L. Taylor  
United States District Judge

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I, Nicolle A. Stortz, am employed in the aforesaid County, State of California; I am over the age of 18 years and not a party to the within action; my business address is 500 North State College Blvd., Suite 1350, Orange, California 92868.

On June 20, 2003, I served the foregoing **STIPULATION TO DISMISS PLAINTIFF FRED PIERCE'S "OVER-DETENTION CLAIM"; [PROPOSED] ORDER** on the interested parties in this action by placing a true copy thereof, enclosed in a sealed envelope, addressed as follows:

**SEE ATTACHED LIST.**

X BY MAIL

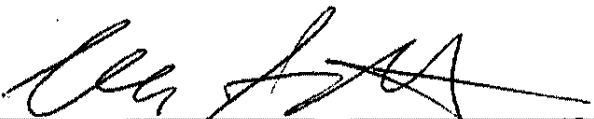
\_\_\_\_\_ I placed such envelope for deposit in the U.S. Mail for service by the United States Postal Service, with postage thereon fully prepaid.

X As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Orange, California, in the ordinary course of business.

\_\_\_\_\_ BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to the offices of the addressee. **PROOF OF SERVICE TO BE FILED.**

X (Federal) I declare under penalty of perjury that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on June 20, 2003, at Orange, California.

  
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Signature of Declarant

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Pierce v. County of Orange

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