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10 Attorneys for Plaintiff

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA
13 SACRAMENTO DIVISION

14 PRISON LEGAL NEWS, a project of the
HUMAN RIGHTS DEFENSE CENTER,

15 Plaintiff,

16 v.

17 COUNTY OF SACRAMENTO;
18 SCOTT R. JONES, individually and in his
capacity as Sheriff of the County of
19 Sacramento; DOES 1-20, in their
individual and official capacities,

20 Defendants.
21

Case No. 2:11-cv-00907-JAM-DAD

**STIPULATION AND ORDER
DISMISSING CASE AND RETAINING
JURISDICTION OVER CONSENT
DECREE**

Judge: Hon. John A. Mendez

1 THE PARTIES, THROUGH THEIR RESPECTIVE COUNSEL, STIPULATE AS
2 FOLLOWS:

3 1. The Parties have negotiated a settlement by consent decree, resolving all
4 claims asserted in the Complaint. *See Exhibit A.*

5 2. The Parties agree that settlement has altered the legal and juridical
6 relationship of the Parties.

7 3. Plaintiff has released Defendants for all claims pursuant to Paragraph 8 of
8 the Consent Decree.

9 4. The Parties have further agreed that this Court should dismiss the complaint
10 with prejudice, but retain jurisdiction over the case to enforce the Consent Decree until
11 such jurisdiction is terminated by the Court upon motion made by either Party. *See*
12 *Consent Decree, ¶ 19.*

13 5. The Parties respectfully request that the Court enter the [Proposed] Order set
14 forth below, instructing the Clerk to administratively close the case.

15 IT IS SO STIPULATED.

16 DATED: August 6, 2012

Respectfully submitted,

17 ROSEN, BIEN & GALVAN, LLP

18
19 By: *s/ Ernest Galvan*

20 Ernest Galvan

21 Attorneys for Plaintiff

22 LONGYEAR, O'DEA & LAVRA, LLP

23 Bv: *s/ John Lavra*

24 John Lavra

25 Attorneys for Defendants
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ORDER ADMINISTRATIVELY CLOSING CASE

IT IS HEREBY ORDERED that:

The parties having reached a Consent Decree resolving the Plaintiff's claims, the Court orders the claims dismissed with prejudice under Rule 41(a)(2) of the Federal Rules of Civil Procedure, subject to the condition that the Court retains jurisdiction to enforce compliance with the Consent Decree, until such jurisdiction is terminated by the Court upon motion made by either Party. Motions regarding the Consent Decree may be filed by the parties under this case number pursuant to the Court's ancillary jurisdiction to enforce the Consent Decree.

IT IS HEREBY ORDERED

DATED: August 7, 2012

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE