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8 UNITED STATES DISTRICT COURT  
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA - Western Division

10 TONY LAVAN, et al., ) CASE NO: cv 11-02874 PSG (AJWx)  
11 Plaintiffs, )  
12 v. ) JOINT NOTICE OF TENTATIVE  
13 CITY OF LOS ANGELES, et al., ) SETTLEMENT, REQUEST TO VACATE  
14 Defendants. ) TRIAL DATE, AND FOR THE COURT  
15 ) TO RETAIN JURISDICTION TO  
16 ) COMPLETE THE SETTLEMENT  
17 ) Date: None  
18 ) Time: None  
19 ) Ctrm: Roybal 880 (Hon. Philip Gutierrez)

Action filed: April 5, 2011

19 The undersigned counsel submit this Joint Notice of Tentative Settlement,  
20 Request to Vacate the Trial Date and for the Court to retain Jurisdiction to  
21 Complete Settlement. As the Court is aware, the parties participated in a  
22 settlement conference before Magistrate Judge Woehrle on November 24, 2015,  
23 at which time they reached a tentative settlement of the remaining issues in this  
24 action.

25 The settlement requires a four-step approval procedure by the City. That  
26 process is anticipated to take at least three months, if not longer, particularly in  
27 light of the upcoming holidays resulting in the cancellation of several meeting  
28 dates for City officials. If the settlement is approved by the City Council, the

1 third step in the process, it then goes to the Mayor, who has 10 days to act on the  
2 proposal.

3 The parties have agreed that, if approved by the City, the settlement will be  
4 paid at the beginning of the next fiscal year, which is July 1, 2016.

5 Accordingly, the parties request that the Court vacate the current  
6 scheduling order to permit the settlement to be considered by the defendant. The  
7 parties will notify the Court of the outcome of the settlement review as soon as it  
8 is completed.

9  
10 Dated: December 2, 2015

Respectfully submitted,

LAW OFFICE OF CAROL A. SOBEL

/s/ Carol A. Sobel

By: CAROL A. SOBEL  
Attorneys for Plaintiffs

MICHAEL N. FEUER, City Attorney  
THOMAS PETERS, Chief Asst. City Attorney  
CORY M. BRENTÉ, Asst, City Attorney  
GEOFFREY PLOWDEN, Deputy City Attorney  
WENDY SHAPERO, Deputy City Attorney

/s/ Geoffrey Plowden

By: GEOFFREY PLOWDEN  
Attorneys for Defendant

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CERTIFICATE OF SERVICE

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The undersigned hereby certifies that the City of Attorney has been served this date by the Court's Electronic Court Filing (ECF) system upon all attorneys of record in this action.

December 2, 2015

s/ Carol A. Sobel  
CAROL A. SOBEL

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5 Attorneys for Plaintiffs  
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8 UNITED STATES DISTRICT COURT  
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA - Western Division

10 TONY LAVAN, et al., ) CASE NO: cv 11-02874 PSG (AJWx)  
11 Plaintiffs, ) [PROPOSED] ORDER RE JOINT NOTICE  
12 v. ) OF TENTATIVE SETTLEMENT,  
13 CITY OF LOS ANGELES, et al., ) REQUEST TO VACATE TRIAL DATE,  
14 Defendants. ) AND FOR THE COURT TO RETAIN  
JURISDICTION TO COMPLETE THE  
SETTLEMENT

15 Date: None  
16 Time: None  
Ctrm: Roybal 880 (Hon. Philip Gutierrez)

17 Action filed: April 5, 2011  
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20 The Court has reviewed with Joint Notice of Tentative Settlement, Request  
21 to Vacate the Trial Date and for the Court to retain Jurisdiction to Complete  
22 Settlement submitted by the parties on December 2, 2015. The docket in this  
23 action reflects the results of the settlement conference conducted by Magistrate  
24 Judge Woehrle on November 24, 2015.

25 The Court is informed that the settlement requires a four-step approval  
26 procedure by the City, as outlined in the Joint Notice, that is anticipated to take  
27 several months to complete.

28 The Court is further informed that, if the settlement is approved, it will be  
paid at the beginning of the next fiscal year, which is July 1, 2016.

1           Accordingly, the Court vacates the current scheduling order to permit the  
2 settlement to be considered by the defendant City. The parties are to notify the  
3 Court of the outcome of the settlement review as soon as it is completed and to  
4 provide a status report on the progress of approval of the settlement no later than  
5 March 31, 2016 if a notice of completion of settlement has not been filed before  
6 that date.

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9 Dated: December 2, 2015

Respectfully submitted,

LAW OFFICE OF CAROL A. SOBEL

/s/ Carol A. Sobel

By: CAROL A. SOBEL  
Attorneys for Plaintiffs

MICHAEL N. FEUER, City Attorney  
THOMAS PETERS, Chief Asst. City Attorney  
CORY M. BRENTÉ, Asst. City Attorney  
GEOFFREY PLOWDEN, Deputy City Attorney  
WENDY SHAPERO, Deputy City Attorney

/s/ Geoffrey Plowden

By: GEOFFREY PLOWDEN  
Attorneys for Defendant

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The undersigned hereby certifies that the City of Attorney has been served this date by the Court's Electronic Court Filing (ECF) system upon all attorneys of record in this action.

December 2, 2015

s/ Carol A. Sobel  
CAROL A. SOBEL