

Bruce D. Goldstein, State Bar No. 135970
County Counsel
Joshua A. Myers, State Bar No. 250988
Deputy County Counsel
OFFICE OF THE SONOMA COUNTY COUNSEL
575 Administration Drive, Room 105A
Santa Rosa, CA 95403-2815
Telephone: (707) 565-2421
Facsimile: (707) 565-2624
Email: joshua.myers@sonoma-county.org

Thomas F. Bertrand, State Bar No. 056560
Richard W. Osman, State Bar No. 167993
BERTRAND, FOX, ELLIOT, OSMAN & WENZEL
2749 Hyde Street
San Francisco, California 94109
Telephone: (415) 353-0999
Facsimile: (415) 353-0990
Email: tbertrand@bfesf.com
rosman@bfesf.com

Attorneys for Defendants
COUNTY OF SONOMA, STEVE FREITAS,
MAZEN AWAD, MICHAEL MERCHEN,
DAVID HOUSE, BRIAN GALLAWAY,
MARIO ROBLEDO, CHAD MCMASTERS,
JASON SQUIRES and JOSEPH MEDEIROS

John H. Scott, State Bar No. 72578
Lizabeth N. de Vries, State Bar No. 227215
SCOTT LAW FIRM
1388 Sutter Street, Suite 715
San Francisco, California 94109
Telephone: (415) 561-9601
Facsimile: (415) 561-9609
Email: john@scottlawfirm.net
liza@scottlawfirm.net

Izaak D. Schwaiger, State Bar No. 267888
130 Petaluma Ave. Suite 1A
Sebastopol, California 95472
Telephone: (707) 595-4414
Facsimile: (707) 581-1983
Email: izaak@izaakschwaiger.com

Attorneys for the Plaintiff
MARQUS MARTINEZ, DANIEL BANKS,
JESUS LOPEZ, MICHAEL ROBERTS, JESSE
BRUCKLACHER, RIGOBERTO CABRERA
and JOSE JUAN BECERRA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARQUS MARTINEZ et al.,

Plaintiffs,

v.

COUNTY OF SONOMA, et al.,

Defendants.

Case No. 3:15-cv-04574-JD

**JOINT NOTICE OF SETTLEMENT AND
REQUEST TO VACATE JUNE 18, 2018 TRIAL
DATE; [PROPOSED] ORDER THEREON**

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendants COUNTY OF SONOMA, STEVE FREITAS, MAZEN AWAD, MICHAEL MERCHEN, DAVID HOUSE, BRIAN GALLAWAY, MARIO ROBLEDO, CHAD MCMASTERS, JASON SQUIRES and JOSEPH MEDEIROS and plaintiffs MARQUS MARTINEZ, DANIEL BANKS, JESUS LOPEZ, MICHAEL ROBERTS, JESSE BRUCKLACHER, RIGOBERTO CABRERA and JOSE JUAN BECERRA have reached a settlement in this case. The settlement was conditioned on the County obtaining necessary Board approval and excess carrier approval.

All necessary approvals now have been obtained. The parties have agreed on language contained in a written settlement agreement and release and all that remains is to obtain signatures of the parties, which include seven (7) plaintiffs that are located in various cities throughout California. Therefore, the parties anticipate obtaining necessary signatures and then then filing a stipulated dismissal within 45 days.

Based on this settlement, Plaintiffs and Defendants respectfully request that the Court vacate the June 18, 2018 trial date.

Dated: June 13, 2018

BERTRAND, FOX, ELLIOT,
OSMAN & WENZEL

By: /s/ Richard W. Osman
Richard W. Osman
Attorneys for Defendants
COUNTY OF SONOMA, STEVE FREITAS,
MAZEN AWAD, MICHAEL MERCHEN,
DAVID HOUSE, BRIAN GALLAWAY,
MARIO ROBLEDO, CHAD MCMASTERS,
JASON SQUIRES, ROBERT TRAVELSTEAD,
and JOSEPH MEDEIROS

1 Dated: June 13, 2018

SCOTT LAW FIRM

2 By: /s/ John H. Scott

3 John H. Scott
4 Elizabeth N. de Vries
5 Attorneys for Plaintiffs
6 MARQUS MARTINEZ, DANIEL BANKS,
7 JESUS LOPEZ, MICHAEL ROBERTS, JESSE
8 BRUCKLACHER, RIGOBERTO CABRERA
9 and JOSE JUAN BECERRA

8 Dated: June 13, 2018

LAW OFFICES OF IZAAK D. SCHWAIGER

9 By: /s/ Izaak D. Schwaiger

10 Izaak D. Schwaiger
11 Attorneys for Plaintiffs
12 MARQUS MARTINEZ, DANIEL BANKS,
13 JESUS LOPEZ, MICHAEL ROBERTS, JESSE
14 BRUCKLACHER, RIGOBERTO CABRERA
15 and JOSE JUAN BECERRA

16 **ELECTRONIC CASE FILING ATTESTATION**

17 I, Richard W. Osman, am the ECF user whose identification and password are being used to file
18 the foregoing documents. Pursuant to Civil Local Rule 5.1(i), I hereby attest that concurrence in the
19 filing of these documents has been obtained from each of its signatories.

20 Dated: June 13, 2018

BERTRAND, FOX, ELLIOT,
OSMAN & WENZEL

21 By: /s/ Richard W. Osman

22 Richard W. Osman

[PROPOSED] ORDER

GOOD CAUSE APPEARING THEREFORE, the June 18, 2018 trial date in this matter is vacated and the parties are ordered to file a Stipulation for Dismissal by July 28, 2018.

IT IS SO ORDERED.

Dated: _____

HON. JAMES DONATO
United States District Judge