

1 CAROL A. SOBEL SBN 84483
JOHN P. GIVEN SBN 269787
2 LAW OFFICE OF CAROL A. SOBEL
3110 Main Street, Suite 210
3 Santa Monica, California 90405
t. 310 393-3055 f. 310 451-3858
4 e. carolsobel@aol.com
e. john@johngiven.com

5 Attorneys for Plaintiffs
6
7

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
) COMPLETE THE SETTLEMENT
) Date: None
) Time: None
) Ctrm: Roybal 880 (Hon. Philip Gutierrez)

Action filed: April 5, 2011

16
17
18
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

28

CERTIFICATE OF SERVICE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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