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17 UNITED STATES DISTRICT COURT
18 FOR THE CENTRAL DISTRICT OF CALIFORNIA
19

20 UNITED STATES OF AMERICA,

21 Plaintiff,

22 v.

23 LOS ANGELES COUNTY,
CALIFORNIA,

24 Defendant.
25

No. 2:23-cv-05165-FLA(MRWx)

**STIPULATION FOR DISMISSAL OF
ACTION WITH PREJUDICE;
[PROPOSED] ORDER**

Hon. Fernando L. Aenlle-Rocha
United States District Judge

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1 IT IS HEREBY STIPULATED by and between Plaintiff United States of
2 America, and Defendant Los Angeles County, California, subject to the Court’s
3 approval, that this action be dismissed with prejudice pursuant to Rule 41 of the Federal
4 Rules of Civil Procedure subject to the provisions of the parties’ settlement agreement
5 (Dkt. 62-1). The parties respectfully submit that good cause exists for the following
6 reasons:

7 1. On August 1, 2024, the parties reached a settlement agreement
8 (“Agreement”) in the above-captioned matter. *See* Notice of Lodging of Agreement
9 (Dkt. 62).

10 2. Pursuant to Paragraphs 10 and 13 of the Agreement, on or about November
11 14, 2024, the County retained California Certified Accessibility Specialists, Inc. to serve
12 as the independent accessibility expert under the Agreement.

13 3. Pursuant to Paragraph 21 of the Agreement, the United States agreed to
14 dismiss its complaint with prejudice pursuant to Fed. R. Civ. P. 41 no more than five (5)
15 business days after the County has selected an Expert.

16 4. Pursuant to Paragraph 21 of the Agreement, the Court’s order of dismissal
17 must incorporate the terms of the Agreement and indicate the parties’ agreement that the
18 Court retain ancillary jurisdiction to enforce the Agreement.

19 5. Pursuant to Paragraph 21 of the Agreement, the parties have agreed to
20 satisfy any procedural requirements to allow the court to retain post-dismissal
21 jurisdiction to enforce the terms of the Agreement, per *K.C. ex rel. Erica C. v.*
22 *Torlakson*, 762 F.3d 963, 967-68 (9th Cir. 2014) and related cases.

23 6. The parties will bear their own attorney’s fees, costs, and expenses.

24 WHEREFORE, the parties respectfully submit this Stipulation to the Court for its
25 approval.
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1 Dated: November 20, 2024

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5 /s/ Richard Park

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United States of America

11 Dated: November 20, 2024

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/s/ Christopher Pelham

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JACQUELINE C. KARAMA
KELLY DOYLE DAHAN

Attorneys for Defendant
Los Angeles County, California

17 * Pursuant to Local Rule 5-4.3.4(2)(i), the filer attests that all other signatories listed,
18 and on whose behalf the filing is submitted, concur in the filing's content and have
19 authorized the filing.

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