

1 HARMEET K. DHILLON (SBN: 207873)  
harmeet@dhillonlaw.com  
2 KRISTA L. BAUGHMAN (SBN: 264600)  
kbaughman@dhillonlaw.com  
3 GREGORY R. MICHAEL (SBN: 306814)  
gmichael@dhillonlaw.com  
4 DHILLON LAW GROUP INC.  
5 177 Post Street, Suite 700  
6 San Francisco, California 94108  
Telephone: (415) 433-1700  
7 Facsimile: (415) 520-6593

8 Attorneys for Plaintiffs

9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN JOSE DIVISION**  
12

13 JUAN HERNANDEZ, et al.,  
14 Plaintiffs,  
15 v.  
16 CITY OF SAN JOSE, et al.,  
17 Defendants.

Case Number: 5:16-cv-03957-LHK

Honorable Lucy H. Koh

**NOTICE OF CONDITIONAL  
SETTLEMENT; AND**

**JOINT STIPULATION AND  
[PROPOSED] ORDER CONTINUING  
CASE MANAGEMENT CONFERENCE  
TO APRIL 29, 2020**

CMC Date: March 18, 2020

Trial Date: June 19, 2020

Courtroom: 8



1                   **NOTICE OF CONDITIONAL SETTLEMENT & JOINT STIPULATION**

2           TO THE COURT, ALL PARTIES, AND COUNSEL OF RECORD: the Parties have agreed to  
3 settle the above-captioned matter, subject to the completion of terms and conditions specified in a  
4 written Settlement Agreement. The Settlement Agreement, in relevant part, provides for the public  
5 release of a prepared statement by the mayor of San Jose, Sam Liccardo. The mayor is currently  
6 reconsidering modifications to that statement which were proposed by several Plaintiffs. Pursuant to  
7 the terms of the Settlement Agreement, Plaintiffs will request dismissal of this entire Action upon  
8 satisfaction of the conditions set forth therein, namely, the release of the final statement.

9           In light of this conditional settlement, and pursuant to Local Rule 6-2, the Parties, by and  
10 through their respective counsel, stipulate and agree as follows:

11           WHEREAS, the Parties have agreed to settle the matter in accordance with the terms set forth  
12 in the Settlement Agreement;

13           WHEREAS, the Parties expect such conditions of settlement to be completed within 30 days  
14 of the filing of this notice and stipulation;

15           WHEREAS, the Parties are scheduled to appear for a further case management conference on  
16 March 18, 2020 and are required to file a joint case management conference statement by March 11,  
17 2020;

18           WHEREAS, the Parties stipulate and respectfully request that the Court continue the March  
19 18, 2020 case management conference to April 29, 2020, and the deadline to file the joint case  
20 management statement to April 22, 2020, with the understanding that Plaintiffs will file a request for  
21 dismissal of the Action following completion of the conditional terms of settlement; in the unlikely  
22 event that the settlement conditions are not completed within 30 days, the Parties will provide the  
23 Court with an update at the case management conference.

24           NOW THEREFORE, the Parties stipulate and respectfully request that the Court continue the  
25 March 18, 2020 further case management conference and associated joint case management statement  
26 deadlines by 6 weeks, to April 29, 2020 and April 22, 2020, respectively.

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

Respectfully submitted,

Dated: March 10, 2020

DHILLON LAW GROUP INC.

By: /s/ Gregory R. Michael

Gregory R. Michael  
Attorney for Plaintiffs

Dated: March 10, 2020

OFFICE OF THE CITY ATTORNEY, SAN JOSE

By: /s/ Matthew Pritchard

Matthew Pritchard (SBN: 284118)  
Attorneys for the City of San Jose, Loyd  
Kingsworthy, Lisa Gannon, Kevin Abruzzini,  
Paul Messier, Paul Spagnoli, Johnson Fong, and  
Jason Ta

**ATTESTATION PURSUANT TO CIVIL L.R. 5-1(i)(3)**

I, Gregory R. Michael, am the ECF User whose ID and password are being used to file this document. I hereby attest that concurrence in the filing of this document has been obtained from the signatories.

Dated: March 10, 2020

DHILLON LAW GROUP INC.

By: /s/ Gregory R. Michael

Gregory R. Michael

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

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: \_\_\_\_\_, 2020

---

Honorable Lucy H. Koh  
United States District Judge

