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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

DARRYL DUNSMORE, ANDREE  
ANDRADE, ERNEST ARCHULETA,  
JAMES CLARK, ANTHONY EDWARDS,  
REANNA LEVY, JOSUE LOPEZ,  
CHRISTOPHER NORWOOD, JESSE  
OLIVARES, GUSTAVO SEPULVEDA,  
MICHAEL TAYLOR, and LAURA  
ZOERNER, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

SAN DIEGO COUNTY SHERIFF'S  
DEPARTMENT, COUNTY OF SAN  
DIEGO, SAN DIEGO COUNTY  
PROBATION DEPARTMENT, and DOES  
1 to 20, inclusive,  
Defendants.

Case No. 3:20-cv-00406-AJB-DDL

**NOTICE OF MOTION AND  
JOINT MOTION FOR  
PRELIMINARY APPROVAL OF  
SETTLEMENT AGREEMENT  
RE: THIRD CLAIM FOR  
RELIEF AND PLAINTIFFS'  
MOTION FOR APPROVAL OF  
DISTRIBUTION METHOD FOR  
CLASS NOTICE**

Judge: Hon. Anthony J. Battaglia

Date: March 6, 2025  
Time: 2:00 p.m.  
Crtrm.: 4A

1 *(counsel continued from preceding page)*

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9 Attorneys for Defendants  
COUNTY OF SAN DIEGO, SAN DIEGO  
10 COUNTY SHERIFF'S OFFICE and SAN DIEGO COUNTY PROBATION  
DEPARTMENT  
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**NOTICE OF MOTION AND MOTION**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT on March 6, 2025, at 2:00 p.m., in Courtroom 4A, or as soon thereafter as the matter may be heard, the Parties to this action will and hereby do move the Court for entry of an Order: (1) granting preliminary approval of the proposed class settlement agreement resolving Plaintiffs' Third Claim for Relief (the "Settlement Agreement") submitted herewith as Exhibit A to the Declaration of Gay Crosthwait Grunfeld in support of this Motion; (2) approving the form of notice of the Settlement Agreement to the Subclass Members; and (3) scheduling deadlines for objections and a fairness hearing regarding final approval of the Settlement Agreement. These issues are subject to Joint Motion by Plaintiffs and Defendants.

Plaintiffs and the Certified Subclass additionally move the Court for entry of an Order approving the manner of distribution of the approved form of notice of the Settlement Agreement to the Subclass Members. The manner of providing notice is disputed by the parties.

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1 The Motion is based upon this Notice of Motion and Motion; the  
2 accompanying Memorandum of Points and Authorities; the attached Declaration of  
3 Gay Crosthwait Grunfeld and the exhibits attached thereto; all pleadings and papers  
4 on file in this action; and any oral argument this Court permits.

5 Respectfully submitted,

6 DATED: January 10, 2025

ROSEN BIEN GALVAN & GRUNFELD LLP

7 By: /s/ Gay Crosthwait Grunfeld

8 Gay Crosthwait Grunfeld

9 Attorneys for Plaintiffs and the Certified Class  
10 and Subclasses

11 DATED: January 10, 2025

BURKE, WILLIAMS & SORENSEN, LLP

12 By: /s/ Elizabeth M. Pappy

13 Elizabeth M. Pappy

14 Attorneys for Defendants  
15

16  
17 **SIGNATURE CERTIFICATION**

18 Pursuant to the Court's Electronic Case Filings Procedures Manual  
19 Section 2(f)(4), I certify that I have obtained consent of all signatories to the  
20 electronic filing of the foregoing document.  
21

22 DATED: January 10, 2025

ROSEN BIEN GALVAN & GRUNFELD LLP

23 By: /s/ Gay Crosthwait Grunfeld

24 Gay Crosthwait Grunfeld

25 Attorneys for Plaintiffs and the Certified Class  
26 and Subclasses  
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