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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13
14 DUNCAN ROY; et al.,) Case No. CV 12-09012 AB (FFMx)
15)
Plaintiffs,) Honorable André Birotte Jr.
16)
17 vs.) **JOINT STATUS REPORT RE**
STATUS OF SETTLEMENT
18)
COUNTY OF LOS ANGELES; et al.,)
19)
20 Defendants.)
_____)
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1 Pursuant to the Court's May 11, 2020 Minute Order (Docket #592),
2 counsel for the parties hereby submit this joint status report regarding the status of
3 their pending settlement.

4 As the Court may recall, with the assistance of two separate mediation
5 sessions, the parties reached tentative agreement on key aspects of this case some
6 time ago, and since that time, have been working to negotiate, document and
7 finalize the remaining aspects of the settlement.

8 On March 6, 2020, the Court held a status conference during which the
9 parties reported that a key issue remained to be negotiated between them, but that
10 the parties were confident that an agreement could be reached, after which the
11 settlement could be submitted for internal review by County executives. The
12 ordered the parties to report back on status in 90 days. Unfortunately,
13 approximately two weeks later, on March 19, the state-wide stay at home orders
14 went into effect as part of efforts to combat the spread of COVID-19.

15 Defendants' efforts to finalize the settlement have been impacted by the
16 COVID-19 pandemic, and specifically because of the need to focus effort, time
17 and available resources toward protecting all County constituents during this
18 unprecedented time. Defendants' ability to focus on this settlement were further
19 impacted by recent litigation filed by Plaintiffs' counsel against defendants
20 seeking immediate wide-ranging injunctive relief on an *ex parte* basis associated
21 with how COVID-19 is being handled in the County jail system

22 Counsel for the parties have negotiated the remaining aspects of the
23 parties' settlement, which is reflected in a settlement agreement jointly drafted by
24 counsel. Upon receipt of a signed copy of that agreement from Plaintiff's
25 counsel, Defense counsel will promptly submit the agreement for approval
26 through the County's approval process, which given the current COVID-19
27 pandemic, could take as long as 8 months. Plaintiffs' counsel will thereafter file
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1 their motion for preliminary approval of the settlement for the Court's
2 consideration.

3 The parties request that the Court set a continued status conference in
4 November 2020 to monitor this matter.

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Dated: May 13, 2020

KAYE, McLANE, BEDNARSKI &
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By /s/ Lindsay Battles
Lindsay Battles
Attorneys for Plaintiffs

Dated: May 13, 2020

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