

1 DAWYN R. HARRISON, County Counsel  
2 PETER BOLLINGER, Assistant County Counsel  
3 EVA CHU, Senior Deputy County Counsel  
4 (SBN 235356)  
5 EChu@counsel.lacounty.gov  
6 648 Kenneth Hahn Hall of Administration  
7 500 West Temple Street  
8 Los Angeles, California 90012-2713  
9 Telephone: (213) 974-0809

7 CHRISTOPHER PELHAM (BAR NO. 241068)  
8 JACQUELINE C. KARAMA (BAR NO. 311120)  
9 **NORTON ROSE FULBRIGHT US LLP**  
10 555 South Flower Street, Forty-First Floor  
11 Los Angeles, California 90071  
12 Telephone: (213) 892-9200  
13 Facsimile: (213) 892-9494  
14 christopher.pelham@nortonrosefulbright.com  
15 jackie.feick@nortonrosefulbright.com

13 Attorneys for Defendant  
14 **LOS ANGELES COUNTY, CALIFORNIA**

14 [additional counsel listed on next page]

16 IN THE UNITED STATES DISTRICT COURT  
17 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
18 WESTERN DIVISION

20 UNITED STATES OF AMERICA,

21 Plaintiff,

22 v.

23 LOS ANGELES COUNTY,  
24 CALIFORNIA,

25 Defendant.

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

**NOTICE OF SETTLEMENT  
AMENDMENT**

Honorable Fernando L. Aenlle-Rocha  
United States District Judge

1 KRISTEN CLARKE  
2 Assistant Attorney General  
3 REBECCA B. BOND (Bar. No. 202220)  
4 Chief Disability Rights Section  
5 KEVIN J. KIJEWSKI  
6 Deputy Chief, Disability Rights Section  
7 ELIZABETH JOHNSON  
8 ALICE W. YAO  
9 KATHERINE DUTCHER (Bar No. 313010)  
10 CHERYL ROST  
11 Trial Attorneys, Disability Rights Section  
12 U.S. Department of Justice  
13 950 Pennsylvania Ave. NW – 4CON  
14 Washington D.C. 20530

15 E. MARTIN ESTRADA  
16 United States Attorney  
17 DAVID M. HARRIS  
18 Chief, Civil Division  
19 RICHARD M. PARK  
20 Chief, Civil Rights Section, Civil Division  
21 KATHERINE M. HIKIDA (Bar No. 153268)  
22 MATTHEW J. BARRAGAN (Bar No. 283883)  
23 MARGARET M. CHEN (Bar No. 336004)  
24 Assistant United States Attorneys  
25 Federal Building, Suite 7516  
26 300 North Los Angeles Street  
27 Los Angeles, California 90012  
28 Telephone: (213) 894-2444  
Facsimile: (213) 894-7819  
Email: Matthew [Barragan@usdoj.gov](mailto:Barragan@usdoj.gov)

Attorneys for Plaintiff  
**UNITED STATES OF AMERICA**

1 On December 3, 2024, the Parties agreed to amend the Agreement that they  
2 filed on August 1, 2014 (Docket No. 62) as follows, with such changes to take  
3 immediate effect:

4 15. For purposes of this agreement, the duties of the Expert will include the  
5 following:

6 c. On ~~December 15, 2024~~ February 14, 2025, and again on June 15,  
7 2025, and every six (6) months after June 15, 2025 (until the end of the expert's  
8 term under Paragraph 11 of this Agreement) thereafter, providing a draft report  
9 for at least one hundred (100) facilities, buildings, sites, or locations  
10 maintained as viable for consideration as Vote Centers selected by the County  
11 and for which the County provided Surveys, Mitigation Plans, Signage plans,  
12 maps, and photographs.

13 16. With respect to the Expert reports described in Paragraph 15(c) and (d)  
14 above:

15 b. After the 30-day period in 16(a), the Expert shall share the draft  
16 report with the United States, as well as notify the United States if there is still  
17 an impasse between the Expert and the County under 16(a). The Expert will  
18 provide the United States with Surveys, Mitigation Plans, Signage Plans,  
19 Maps, and photographs, as well as updated County information, for facilities,  
20 buildings, sites, or locations maintained as viable for consideration as Vote  
21 Centers evaluated by the Expert during the reporting period upon sending the  
22 Expert's draft report. Except as set forth below, over a further 30-day period,  
23 the Expert, the County, and the United States may meet-and-confer regarding  
24 disagreements the parties have regarding that draft report. As to the Expert's  
25 first report under Paragraph 15(c), the draft of which is due on February 14,  
26 2025, the Expert, the County, and the United States may meet and confer over  
27 a 51-day (rather than a 30-day) period after the Expert has shared the draft  
28 report with the United States.

1 Dated: December 4, 2024

Respectfully submitted,

2 E. MARTIN ESTRADA  
United States Attorney  
3 DAVID M. HARRIS  
Chief, Civil Division  
4 RICHARD M. PARK  
Chief, Civil Rights Section  
5

REBECCA B. BOND  
Chief, Disability Rights Section  
KEVIN J. KIJEWSKI  
Deputy Chief, Disability Rights Section

6  
7 By /s/ Richard M. Park  
KATHERINE M. HIKIDA  
8 MATTHEW J. BARRAGAN  
MARGARET M. CHEN  
9 ALEXANDRA YOUNG  
Assistant United States Attorneys  
10

By /s/ Katherine Dutcher  
ELIZABETH JOHNSON  
ALICE W. YAO  
KATHERINE DUTCHER  
11 CHERYL ROST  
Trial Attorneys  
12 Disability Rights Section  
Attorneys for Plaintiff  
United States of America

13 Dated: December 4, 2024

NORTON ROSE FULBRIGHT US LLP

14  
15  
16  
17  
18  
19  
20

By /s/ Christopher Pelham  
CHRISTOPHER PELHAM  
JACQUELINE C. KARAMA  
KELLY DOYLE DAHAN  
Attorneys for Defendant  
LOS ANGELES COUNTY,  
CALIFORNIA

21 **FILER'S ATTESTATION**

22 Pursuant to Local Rule 5-4.3.4(2), the filer attests that all signatories listed,  
23 and on whose behalf the filing is submitted, concurs in the filing's content and have  
24 authorized filing.

25 Dated: December 4, 2024

/s/ Christopher Pelham  
CHRISTOPHER PELHAM

28