

1 THOMAS E. PEREZ  
Assistant Attorney General  
2 Civil Rights Division

3 JONATHAN M. SMITH, Chief

4 LUIS E. SAUCEDO, Acting Deputy Chief, AZ Bar No. 022009

LAURA L. COON, Special Counsel, State Bar No. 220540

5 JEFFREY R. MURRAY

6 Attorneys

UNITED STATES DEPARTMENT OF JUSTICE

7 Civil Rights Division

8 Special Litigation Section, PHB

9 950 Pennsylvania Avenue, NW

Washington, DC 20530

10 Telephone: (202) 353-9269

Facsimile: (202) 514-0212

11 Jeff.Murray@usdoj.gov

12 Attorneys for Plaintiff

13 UNITED STATES OF AMERICA

14 CARMEN A. TRUTANICH, City Attorney, State Bar No. 86629

15 WILLIAM W. CARTER, Chief Deputy City Attorney, State Bar No. 115487

16 CARLOS DE LA GUERRA, Assistant City Attorney, State Bar No. 164046

17 JULIE RAFFISH, Deputy City Attorney, State Bar No. 185504

OFFICE OF THE CITY ATTORNEY

18 200 N. Main Street, 800 City Hall East

Los Angeles, California 90012-4131

19 Telephone: (213) 978-8380

20 Facsimile: (213) 978-8787

Attorneys for Defendants

21 CITY OF LOS ANGELES, THE BOARD OF POLICE

22 COMMISSIONERS OF THE CITY OF LOS ANGELES,

and THE LOS ANGELES POLICE DEPARTMENT

23

24

25

26

27

28

1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA  
3

4 UNITED STATES OF AMERICA,

5 Plaintiff,

7 vs.

8 CITY OF LOS ANGELES, CALIFORNIA,  
9 BOARD OF POLICE COMMISSIONERS  
10 OF THE CITY OF LOS ANGELES, AND  
11 THE LOS ANGELES POLICE  
DEPARTMENT,

12 Defendants.  
13

) CASE No. CV 00-11769 GAF (RCx)  
)  
) **STIPULATION RE DISMISSAL**  
) **OF LAWSUIT**  
)  
) **[Filed Concurrently with Proposed**  
) **Order]**  
)  
) The Honorable Gary A. Feess,  
) United States District Judge  
)  
)  
)

14  
15 **STIPULATION**  
16

17 The Plaintiff, United States of America, and Defendants, City of Los Angeles,  
18 Honorable Board of Police Commissioners, and the Los Angeles Police Department,  
19 hereby stipulate that Defendants have successfully completed all terms of the  
20 Transition Agreement approved by this Court on July 17, 2009, and that this action  
21 should therefore be dismissed.  
22

23 Dated: May 13, 2013  
24  
25  
26  
27  
28

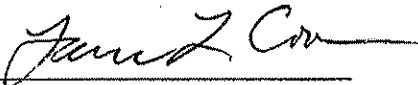
Respectfully submitted,

FOR THE PLAINTIFF, THE UNITED STATES OF AMERICA:

THOMAS E. PEREZ  
Assistant Attorney General  
Civil Rights Division

JONATHAN M. SMITH  
Chief

LUIS E. SAUCEDO  
Acting Deputy Chief  
AZ Bar No. 022009

  
LAURA L. COON  
State Bar No. 220540  
JEFFREY R. MURRAY  
Attorneys  
United States Department of Justice  
Civil Rights Division  
Special Litigation Section, PHB  
950 Pennsylvania Avenue, NW  
Washington, DC 20530  
(202) 353-9269  
(202) 514-0212 (fax)  
jeff.murray@usdj.gov

1 FOR THE DEFENDANTS, CITY OF LOS ANGELES, CALIFORNIA, BOARD OF  
2 POLICE COMMISSIONERS OF THE CITY OF LOS ANGELES, AND THE LOS  
3 ANGELES POLICE DEPARTMENT:

4 CARMEN A. TRUTANICH  
5 City Attorney

6 WILLIAM W. CARTER  
7 State Bar No. 115487  
8 Chief Deputy City Attorney

9 CARLOS DE LA GUERRA  
10 State Bar No. 164046  
11 Assistant City Attorney

12   
13 JULIE S. RAFFISH  
14 State Bar No. 185504  
15 Deputy City Attorney  
16 Los Angeles City Attorney's Office  
17 200 North Main Street, Suite 800  
18 Los Angeles, California 90012  
19 (213) 978-8380  
20 (213) 978-8787 (fax)  
21 Julie.Raffish@lacity.org  
22  
23  
24  
25  
26  
27  
28

PROOF OF SERVICE

I, the undersigned, say: I am over the age of 18 years and not a party to the within action or proceeding. My business address is 800 City Hall East, 200 North Main Street, Los Angeles, California 90012.

On, May 14, 2013, I served the foregoing documents described as:

**STIPULATION RE DISMISSAL OF LAWSUIT [Filed Concurrently with Proposed Order]**

On all interested parties in this action by placing copies thereof enclosed in a sealed envelope addressed as follows:

PLEASE SEE ATTACHED LIST

BY MAIL - I deposited such envelope in the mail at Los Angeles, California, with first class postage thereon fully prepaid. I am readily familiar with the business practice for collection and processing of correspondence for mailing with the United States Postal Service. Under that practice, it is deposited with the United States Postal Service on that same day, at Los Angeles, California, in the ordinary course of business.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed May 14, 2013, at Los Angeles, California.

  
Patricia Guerra

Service List

United States of America v. City of Los Angeles, et al;  
USDC Case No. CV 00-11769 GAF (RCX)

1  
2  
3  
4 Michael Cherkasky  
5 7799 Leesburg Pike, Suite 1100  
6 Falls Church, Virginia 22043

7 Erwin Chemerinsky, Esq.  
8 Duke University School of Law  
9 Science Drive & Towerview Rd.  
10 Durham, NC 27708  
11 Tel (919) 613-7173

12 Erwin Chemerinsky, Esq.  
13 University of California, Irvine  
14 School of Law  
15 4500 Berkeley Place  
16 Irvine, CA 92697-8000

17 Diane Marchant, Esq.  
18 Los Angeles Police Protective League  
19 1308 West Eighth Street, Suite 206  
20 Los Angeles, CA 90017

21 Stephen Yagman, Esq.  
22 Marion R. Yagman, Esq.  
23 Joseph R. Reichmann, Esq.  
24 Kathryn S. Bloomfield, Esq.  
25 YAGMAN YAGMAN REICHMANN  
26 & BLOOMFIELD  
27 723 Ocean Front Walk  
28 Venice, CA 90291-3270  
Tel (310) 452-3200

Jeffrey Murray, Esq.  
Je Yong Jung, Esq.  
U.S. Department of Justice  
Special Litigation Section – PHB  
950 Pennsylvania Avenue, NW  
Washington, D.C. 20530  
[JeYon.Jung@usdoj.gov](mailto:JeYon.Jung@usdoj.gov)  
[Jeffrey.Murray@usdoj.gov](mailto:Jeffrey.Murray@usdoj.gov)

Mark D. Rosenbaum, Esq.  
Catherine E. Lhamon, Esq.  
Peter Bibring, Esq.  
ACLU Foundation of Southern California  
1313 West Eight Street  
Los Angeles, CA 90017  
Tel (213) 977-9500  
Fax (213) 977-5297  
[mrosenbaum@aclu-sc.org](mailto:mrosenbaum@aclu-sc.org)  
[Clhamon@aclu-sc.org](mailto:Clhamon@aclu-sc.org)  
[pbibring@aclu-sc.org](mailto:pbibring@aclu-sc.org)

Enrique Hernandez, Esq.  
Los Angeles Police Protective League  
1308 West Eighth Street, Suite 206  
Los Angeles, CA 90017  
[hankhernandez@lappl.org](mailto:hankhernandez@lappl.org),  
[leaguec@aol.com](mailto:leaguec@aol.com)

Stephen H. Silver, Esq.  
Silver, Hadden & Silver  
1428 2nd Street  
Santa Monica, CA 90407  
[shsilver@shslaborlaw.com](mailto:shsilver@shslaborlaw.com)

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

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

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CITY OF LOS ANGELES, CALIFORNIA,  
BOARD OF POLICE COMMISSIONERS  
OF THE CITY OF LOS ANGELES, AND  
THE LOS ANGELES POLICE  
DEPARTMENT,

Defendants.

) CASE No. CV 00-11769 GAF (RCx)  
)  
) **[PROPOSED] ORDER**  
)  
) The Honorable Gary A. Feess,  
) United States District Judge

**ORDER OF DISMISSAL**

Pursuant to the stipulation of the parties, **IT IS HEREBY ORDERED** that this action is **DISMISSED, WITH PREJUDICE**. The Clerk is directed to close the file.

Dated: \_\_\_\_\_, 2013

\_\_\_\_\_  
Honorable Gary A. Feess  
United States District Court Judge

PROOF OF SERVICE

I, the undersigned, say: I am over the age of 18 years and not a party to the within action or proceeding. My business address is 800 City Hall East, 200 North Main Street, Los Angeles, California 90012.

On, May 14, 2013, I served the foregoing documents described as:

**[PROPOSED] ORDER**

On all interested parties in this action by placing copies thereof enclosed in a sealed envelope addressed as follows:

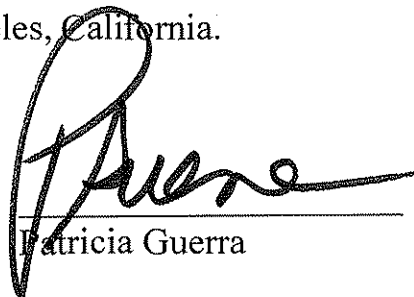
PLEASE SEE ATTACHED LIST

BY MAIL - I deposited such envelope in the mail at Los Angeles, California, with first class postage thereon fully prepaid. I am readily familiar with the business practice for collection and processing of correspondence for mailing with the United States Postal Service. Under that practice, it is deposited with the United States Postal Service on that same day, at Los Angeles, California, in the ordinary course of business.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed May 14, 2013, at Los Angeles, California.



Patricia Guerra



Service List

United States of America v. City of Los Angeles, et al;  
USDC Case No. CV 00-11769 GAF (RCX)

1  
2  
3  
4 Michael Cherkasky  
5 7799 Leesburg Pike, Suite 1100  
6 Falls Church, Virginia 22043

7 Erwin Chemerinsky, Esq.  
8 Duke University School of Law  
9 Science Drive & Towerview Rd.  
10 Durham, NC 27708  
11 Tel (919) 613-7173

12 Erwin Chemerinsky, Esq.  
13 University of California, Irvine  
14 School of Law  
15 4500 Berkeley Place  
16 Irvine, CA 92697-8000

17 Diane Marchant, Esq.  
18 Los Angeles Police Protective League  
19 1308 West Eighth Street, Suite 206  
20 Los Angeles, CA 90017

21 Stephen Yagman, Esq.  
22 Marion R. Yagman, Esq.  
23 Joseph R. Reichmann, Esq.  
24 Kathryn S. Bloomfield, Esq.  
25 YAGMAN YAGMAN REICHMANN  
26 & BLOOMFIELD  
27 723 Ocean Front Walk  
28 Venice, CA 90291-3270  
Tel (310) 452-3200

Jeffrey Murray, Esq.  
Je Yong Jung, Esq.  
U.S. Department of Justice  
Special Litigation Section – PHB  
950 Pennsylvania Avenue, NW  
Washington, D.C. 20530  
[JeYon.Jung@usdoj.gov](mailto:JeYon.Jung@usdoj.gov)  
[Jeffrey.Murray@usdoj.gov](mailto:Jeffrey.Murray@usdoj.gov)

Mark D. Rosenbaum, Esq.  
Catherine E. Lhamon, Esq.  
Peter Bibring, Esq.  
ACLU Foundation of Southern California  
1313 West Eight Street  
Los Angeles, CA 90017  
Tel (213) 977-9500  
Fax (213) 977-5297  
[mrosenbaum@aclu-sc.org](mailto:mrosenbaum@aclu-sc.org)  
[Clhamon@aclu-sc.org](mailto:Clhamon@aclu-sc.org)  
[pbibring@aclu-sc.org](mailto:pbibring@aclu-sc.org)

Enrique Hernandez, Esq.  
Los Angeles Police Protective League  
1308 West Eighth Street, Suite 206  
Los Angeles, CA 90017  
[hankhernandez@lappl.org](mailto:hankhernandez@lappl.org),  
[leaguec@aol.com](mailto:leaguec@aol.com)

Stephen H. Silver, Esq.  
Silver, Hadden & Silver  
1428 2nd Street  
Santa Monica, CA 90407  
[shsilver@shslaborlaw.com](mailto:shsilver@shslaborlaw.com)