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11 [*Additional counsel continued on next page*]

12
13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

15 VANESSA BRYANT,
16
17 Plaintiff,
18 vs.
19 COUNTY OF LOS ANGELES, et al.,
20 Defendants.

Case No. 2:20-cv-09582-JFW-E
JOINT NOTICE OF SETTLEMENT
AND STIPULATION TO AMEND
COMPLAINT AND SET CASE
DEADLINES

[*Proposed Order Filed Concurrently
Herewith*]

Assigned to the Hon. John F. Walter
and Magistrate Judge Charles F. Eick

1 *[Additional counsel, continued from previous page]*

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22 Attorneys for Defendant Los Angeles County Sheriff's Department
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1 Plaintiff Vanessa Bryant and Defendants Los Angeles County Sheriff's
2 Department, County of Los Angeles, Los Angeles County Fire Department, Joey
3 Cruz, Rafael Mejia, Michael Russell, and Raul Versales (collectively, "Defendants")
4 hereby notify the Court that:

5 (a) they have entered into a settlement agreement resolving the claims
6 asserted by Vanessa Bryant in this matter;

7 (b) the settlement agreement also resolves similar claims asserted against
8 Defendants by Plaintiff's adult child, Natalia Bryant, and Plaintiff's minor children,
9 B.B. and C.B.;

10 (c) the settlement agreement as to all parties is conditional upon court
11 approval of the settlement with respect to the minor children, B.B. and C.B.; and

12 (d) the parties believe it would be most efficient for this Court to consider the
13 petition to approve the settlement with respect to the minor children, for which
14 purpose they have agreed to amend the operative complaint in this case to ensure
15 that the minors' claims being settled are the subject of a pending action in this
16 Court;

17 (e) amendment of the Complaint to add claims by the minor children is proper
18 under FRCP 15(a)(2), including because there has not yet been a trial of Plaintiff's
19 state law claims and the opposing party consents to the amendment, and under
20 FRCP 20(a), including because the minors' claims arise from the same occurrences
21 as Vanessa Bryant's and present common questions of law and fact; and

22 (f) amendment of a federal complaint to add claims by additional minor
23 children in order to provide an efficient forum for their proposed settlements to be
24 reviewed and approved is supported by precedent, e.g., *Allen v. Robert's Am.*
25 *Gourmet Food, Inc.*, No. 2:07-CV-02661, Mot. to Amend to Join Additional
26 Plaintiffs (Dkt. No. 55), 2009 WL 479238 (E.D.N.Y. Jan. 12, 2009), granted Jan.
27 27, 2009.

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1 **Therefore, Plaintiff Vanessa Bryant, on behalf of herself and her minor**
2 **children B.B. and C.B., and Defendants hereby stipulate as follows:**

3 (1) Plaintiffs Vanessa Bryant, B.B., and C.B. may file a Second Amended
4 Complaint adding B.B. and C.B. as plaintiffs and asserting claims by B.B. and C.B.
5 that are similar to those asserted by Vanessa Bryant, a copy of which is attached
6 hereto as Exhibit 1;

7 (2) Defendants waive notice and service of the Second Amended Complaint
8 and shall not be required to answer the amendment, and all denials, responses and
9 affirmative defenses contained in the answer filed by Defendants to the First
10 Amended Complaint shall be deemed responsive to the Second Amended
11 Complaint, including as to allegations by plaintiffs B.B. and C.B.;

12 (3) The parties shall file a petition to approve the settlement as to minor
13 children B.B. and C.B., consistent with L.R. 17-1.2 *et seq.* and applicable
14 substantive and procedural requirements of California law, no later than March 28,
15 2023, and any hearing thereon shall be set for the first available date after the
16 petition is filed;

17 (4) All other case deadlines—including the deadline for Plaintiff Vanessa
18 Bryant file an opposition to Defendants’ renewed Motion pursuant to Federal Rule
19 of Civil Procedure 50(b), the deadline for Plaintiff Vanessa Bryant to submit a
20 statement regarding whether she intends to pursue her state law causes of action, and
21 the deadline for Plaintiff Vanessa Bryant to file her motion for attorneys’ fees and
22 related nontaxable expenses pursuant to Federal Rule of Civil Procedure 54(d)(2)—
23 shall be vacated pending the parties’ filing of and the Court’s ruling on the petition
24 to approve the settlement as to the minor children; and

25 (5) Should it be necessary to reschedule any of the vacated deadlines
26 following the Court’s ruling on the petition, the parties shall submit a stipulation for
27 Court approval within one week of the Court’s ruling.

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1 DATED: February 28, 2023

WILSON SONSINI GOODRICH & ROSATI,
Professional Corporation

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By: /s/ Luis Li

LUIS LI

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Attorneys for Plaintiffs Vanessa Bryant, B.B.
and C.B

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9 DATED: February 28, 2023

OFFICE OF COUNTY COUNSEL

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By: /s/ Jonathan McCaverty

JONATHAN C. McCAVERTY

13

Attorneys for Defendant Los Angeles County
Sheriff's Department

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15

16 DATED: February 28, 2023

MILLER BARONDESS, LLP

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By: /s/ Jason Tokoro

JASON H. TOKORO

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Attorneys for Defendants County of Los
Angeles, Los Angeles county Fire Department,
Joey Cruz, Rafael Mejia, Michael Russell, Raul
Versales, Arlin Kahan and Tony Imbrenda

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ECF CERTIFICATION

I, Luis Li, attest under Local Rule 5-4.3.4(a)(2)(i) that all signatories listed, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized this filing.

DATED: February 28, 2023

/s/ Luis Li

Luis Li