

1 THOMAS E. MONTGOMERY, County Counsel
County of San Diego
2 By DAVID L. BRODIE, Chief Deputy (State Bar No. 156855)
LAURA E. DOLAN, Senior Deputy (State Bar No. 302859)
3 1600 Pacific Highway, Room 355
San Diego, California 92101-2469
4 Telephone: (619) 531-4871; (619) 531-5801
Email: david.brodie@sdcounty.ca.gov
5 Email: laura.dolan@sdcounty.ca.gov

6 Attorneys for Defendants Erica Cortez and County of San Diego (also erroneously sued
as “Office of County Counsel”)
7

8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

11	A.G., an individual,)	No. 18-cv-1802-AJB-MDD
12	Plaintiff,)	JOINT NOTICE OF SETTLEMENT AND REQUEST TO VACATE UPCOMING DATES
13	v.)	
14	ERICA CORTEZ, an individual;)	
15	COUNTY OF SAN DIEGO, a public)	Honorable Anthony J. Battaglia
16	entity; OFFICE OF COUNTY COUNSEL,)	Magistrate Judge: Hon. Mitchell D. Dembin
17	public subdivision; DOES 1 through 50,)	
18	inclusive,)	
19	Defendants.)	

20 By and through their attorneys of record, Plaintiff and Defendants (the “Parties”)
21 seek to vacate the upcoming dates set forth in this Court’s briefing schedule filed on
22 August 8, 2018 (Doc. No. 6) in this matter because the case has been resolved via
23 settlement.

24 The Parties submit this Joint Notice of Settlement to inform the Court that on
25 August 9, 2018, following mediation, the parties jointly reached an agreement to settle
26 the above-referenced case and the matter of Gordon v. County of San Diego, Case No.
27 16-CV-2290-AJB-JLB, which is also currently pending in the Southern District of
28 California. The Parties are in the process of drafting the necessary documents to

1 effectuate the terms of the settlement. The Parties agreed to finalize all documents, issue
2 payment, and file a notice of dismissal with prejudice within 30 days of the mediation.

3 For these reasons, the Parties jointly request that the Court vacate the upcoming
4 dates.

5 DATED: August 14, 2018 THOMAS E. MONTGOMERY, County Counsel

6
7 By s/Laura E. Dolan
8 DAVID L. BRODIE, Chief Deputy
LAURA E. DOLAN, Senior Deputy
Attorneys for Defendants

9 DATED: August 14, 2018 THE LAW OFFICES OF SHAWN A. MCMILLAN, APC

10 By s/Shawn A. McMillan
11 SHAWN A. MCMILLAN, Esq.
STEPHEN D. DANER, Esq.
ADRIAN M. PARIS, Esq.
12 Attorneys for Plaintiffs

13
14 I, LAURA E. DOLAN, certify that the content of this joint notice is acceptable to
15 all parties required to sign this joint notice. All parties authorize County Counsel to affix
16 their CM/ECF electronic signature to this joint notice.

17 DATED: August 14, 2018 THOMAS E. MONTGOMERY, County Counsel

18 By s/Laura E. Dolan
19 DAVID L. BRODIE, Chief Deputy
LAURA E. DOLAN, Senior Deputy
Attorneys for Defendants

20
21
22
23
24
25
26
27
28