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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

CASEY A.; CARL C.; and MIGUEL B.,
by and through L.L., on behalf of
themselves and all those similarly
situated,

Plaintiffs,

vs.

ARTURO DELGADO, in his official
capacity, Interim Superintendent, Los
Angeles County Office of Education;
WILLIAM ELKINS, in his official
capacity, Director, Los Angeles County
Office of Education Division of Juvenile
Court Schools; RONDALE COOPER, in
his official capacity, Principal, Los
Angeles County Office of Education
Challenger Center School; and LOS
ANGELES COUNTY PROBATION
DEPARTMENT,

Defendants.

Case No. CV 10-00192 GHK (FMOx)

**Joint Stipulation for Order for
Defendants to Develop Plan to
Ensure Compliance with the
Settlement Agreement and Approval
of Agreed Upon Attorney's Fees**

**Date: TBD
Time: TBD
Court: 650, Roybal**

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2 (*Pro Hac Vice*)

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2 **Whereas** the Court has continuing jurisdiction to enforce the terms of and
3 ensure compliance with the Settlement Agreement (Dkt. No. 55- 1, ¶ 77);

4 **Whereas** Class Counsel contend that Defendants are currently out of
5 compliance in a number of the 13 discrete substantive areas of the Settlement
6 Agreement, which includes the Action Plan and Detailed Plans and their timelines
7 (incorporated by reference to the Settlement Agreement and on file with this Court at
8 Docket #60, Attachment 6 & 7), which were approved by the Court on May 23, 2011;

9 **Whereas** the November 25, 2011 TCA Quarterly Report and attached Rating
10 Scales, filed concurrently herewith and attached as Exhibits A-C to the Declaration of
11 Laura Faer, detail the areas in which the Defendants are out of compliance;

12 **Whereas** pursuant to paragraph 71 of the Settlement Agreement, Class
13 Counsel shall be paid reasonable attorneys' fees and costs for ongoing work to ensure
14 compliance with the Agreement and the parties shall endeavor to reach an agreement
15 on the semi-annual fee award and submit a stipulation for the Court's approval;

16 **Based upon the agreement of the Parties to this action, it is hereby**
17 **stipulated that:**

18 Defendants shall work with the Technical, Consulting, and Advisory ("TCA")
19 Team to develop a plan to be approved by the TCA Team to bring about substantial
20 compliance with the Settlement Agreement and incorporated Action and Detailed
21 Plans to be filed by with this Court on or before Monday, February 6, 2012.

22 Defendants shall return to this Court within 45 days of the plan's submission to
23 report on the steps taken to reach compliance and any ongoing areas of non-
24 compliance.

25 Class counsel shall receive the agreed upon and reasonable attorneys' fees
26 amount of \$38,500, which shall be paid to Public Counsel for distribution within 30
27 days of the Court's approval.

28 Joint Stipulation for Order for Defendants to Develop Plan to Ensure Compliance and Att. Fees

1 All parties hereto reserve their respective rights, remedies and defenses in and
2 to this legal action, notwithstanding this stipulated order.
3

4 DATED: December 16, 2011 By: _____
5 Laura Faer
6 Public Counsel Law Center
7 Attorneys for Plaintiffs and the Plaintiff Class

8 DATED: December 16, 2011 By: _____
9 Roger Granbo
10 County Counsel
11 Attorney for Defendant Los Angeles County
12 Department of Probation, et al.

13 DATED: December 16, 2011 By: _____
14 Vibiana Andrade
15 General Counsel
16 Los Angeles County Office of Education
17 Attorney for Defendants Arturo Delgado, et al.

18 **IT IS SO ORDERED.**

19
20 Dated: 12/20/2011

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22 Hon. George H. King
23 United States District Judge
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