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16 Attorneys for Plaintiffs

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

19 PATRICK ALLEN CANNAVAN, on
20 behalf of himself and all others
21 similarly situated,

22 Plaintiff,

23 v.

24 COUNTY OF VENTURA,
25 VENTURA COUNTY SHERIFF
26 BILL AYUB, CECIL ARGUE,
27 PATRICIA SALAS, ERIC DOWD,
28 and DOES 1-10, inclusive,

Defendants.

CASE NO: 2:20-cv-10012-FMO (PVCx)

**JOINT STATUS REPORT RE
STATUS OF SETTLEMENT AND
REQUEST TO EXTEND DATE OF
DISMISSAL OF ENTIRE ACTION
WITH PREJUDICE BY 60 DAYS**

1 On April 19, 2022, Plaintiff notified the Court that a settlement agreement
2 had been reached between the parties in the case and requested that the Court set an
3 OSC Re Dismissal for approximately 60 days thereafter. (Dkt. 79) On April 25,
4 2022, the Court issued an Order dismissing the case but allowing the parties, upon
5 good cause shown, to re-open the action within 60 days from the Court's order if the
6 settlement is not consummated. (Dkt. 80)

7 The parties have made steady progress towards consummating the settlement.
8 A written settlement agreement has been finalized and is currently pending review
9 and approval by Plaintiff. Because Plaintiff is incarcerated, there are delays in
10 processing and delivery of his mail, but Plaintiff's counsel has confirmed that
11 Plaintiff is in receipt of the settlement agreement. Counsel for Plaintiff, David
12 McLane, will have to personally travel and meet with Mr. Cannavan to go over the
13 terms of the settlement, respond to any questions he may have, and to collect the
14 signed settlement agreement. Mr. McLane has been out of the country on a pre-
15 planned vacation for the past two weeks. Upon return, Mr. McLane tested positive
16 for Covid-19 and must now quarantine. As a result Mr. McLane will not be able to
17 meet with Plaintiff and the settlement cannot be finalized prior to the expiration of
18 the 60 day dismissal deadline set by the Court, which is June 24, 2022.

19 The Parties respectfully request the Court continue the current June 24, 2022
20 dismissal deadline for an additional 60 days to allow time for: (1) Plaintiff to
21 review and sign the settlement agreement; and, (2) the parties to consummate

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1 the settlement and file a stipulation to vacate the provisional class certification and
2 request dismissal of the entire action, with prejudice, pursuant to Rule 41.

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4 DATED: June 24, 2022

McLANE, BEDNARSKI & LITT, LLP

5 By /s/ David S. McLane

6 DAVID S. McLANE
7 Attorneys for Plaintiffs

8 DATED: June 24, 2022

THE LAW OFFICES OF BRIAN A. VOGEL, PC

9 By /s/ Brian A. Vogel

10 BRIAN A. VOGEL
11 Attorneys for Plaintiffs

12
13 DATED: June 24, 2022

By /s/ Emily Gardener

14 EMILY GARDNER
15 Principal Assistant County
16 Counsel
Attorneys for County Defendants

17 DATED: June 24, 2022

LAWRENCE BEACH ALLEN & CHOI, PC

18 By /s/ James S. Eicher, Jr.

19 JAMES S. EICHER, JR.
20 Attorneys for County Defendants
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