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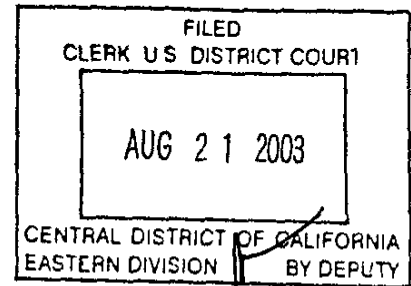
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AUG 22 2003

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA - EASTERN DIVISION

COMITE DE JORNALEROS DE
 RANCHO CUCAMONGA Y UPLAND,
 an unincorporated association,
 NATIONAL DAY LABORER
 ORGANIZING NETWORK, an
 unincorporated association,

Plaintiffs,

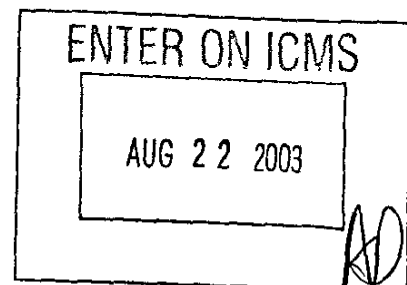
v

CITY OF RANCHO CUCAMONGA,
 CITY OF UPLAND,

Defendants

Case No EDCV 02-1010 VAP (SGL)

**STIPULATION AND
 [PROPOSED] ORDER
 EXTENDING STAY IN THE
 ACTION PENDING
 FINALIZATION OF
 SETTLEMENT AGREEMENT**



STIPULATION AND [PROPOSED] ORDER EXTENDING STAY IN THE ACTION PENDING FINALIZATION OF
 SETTLEMENT AGREEMENT

1 This action is currently stayed pending finalization of a settlement
2 agreement to which the parties have agreed in principal. The parties are working
3 on that agreement, but further work and negotiations remain, which should be
4 completed within 45 days. As such, the parties respectfully request that the Court
5 extend the stay for an additional 45 days.

6 GOOD CAUSE exists for such an order. Plaintiffs are challenging City of
7 Upland and City of Rancho Cucamonga ordinances on First and Fourteenth
8 Amendment grounds. Plaintiffs and Defendants have agreed in principle to settle
9 this matter, but the settlement agreement is unique and several points have to be
10 worked out before the settlement agreement can be finalized. For example,
11 Defendants have agreed in principle to develop written training guidelines for
12 enforcement of the ordinances. Drafts of these materials have been created and
13 the parties are currently discussing them. Defendants have also agreed to establish
14 a day laborer task force in which representatives of the plaintiff organizations will
15 participate. The proposed structure of this task force is currently being reviewed
16 by the parties.

17 The parties anticipate that the final settlement agreement can be in place,
18 and the case dismissed, within 45 days. Therefore, the parties respectfully request
19 that the Court extend the current stay 45 days. At the close of the 45-day period, if
20 not before, it is anticipated the case will be dismissed.

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1 IT IS SO STIPULATED

2
3 DATED August 20, 2003

ROCHELLE BROWNE
MICHAEL P. COYNE
RICHARDS, WATSON & GERSHON
A Professional Corporation

JAMES L. MARKMAN
CITY ATTORNEY
CITY OF RANCHO CUCAMONGA
and CITY OF UPLAND

8 By 
MICHAEL P. COYNE
Attorney for Defendants
CITY OF RANCHO CUCAMONGA,
CITY OF UPLAND

11
12 DATED August __, 2003

THOMAS A. SAENZ
MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL
FUND

15 By _____
THOMAS A. SAENZ
Attorney for Plaintiffs
COMITE DE JORNALEROS DE
RANCHO CUCAMONGA Y
UPLAND, NATIONAL DAY
LABORER ORGANIZING
NETWORK

1 IT IS SO STIPULATED:

2
3 DATED: August __, 2003

ROCHELLE BROWNE
MICHAEL P. COYNE
RICHARDS, WATSON & GERSHON
A Professional Corporation

JAMES L. MARKMAN
CITY ATTORNEY
CITY OF RANCHO CUCAMONGA
and CITY OF UPLAND

8
9 By: _____
MICHAEL P. COYNE
Attorney for Defendants
CITY OF RANCHO CUCAMONGA,
CITY OF UPLAND

10
11
12 DATED: August __, 2003

THOMAS A. SAENZ
MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL
FUND

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14
15 By: 
THOMAS A. SAENZ
Attorney for Plaintiffs
COMITE DE JORNALEROS DE
RANCHO CUCAMONGA Y
UPLAND, NATIONAL DAY
LABORER ORGANIZING
NETWORK

RICHARDS | WATSON | GERSHON
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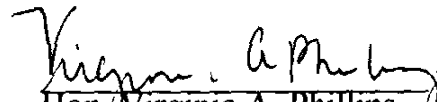
STIPULATION AND (PROPOSED) ORDER, EXTENDING STAY IN THE ACTION PENDING FINALIZATION OF
SETTLEMENT AGREEMENT

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[PROPOSED] ORDER

FOR GOOD CAUSE SHOWN

The current stay in this action is extended 45 days from the date of this order. Within 45 days, the parties are to either file a notice of dismissal, or request that the litigation schedule be reset.


Hon. Virginia A. Phillips,
United States District Judge

IRIN RICHARDS | WATSON | GERSHON
ATTORNEYS AT LAW - A PROFESSIONAL CORPORATION

PROOF OF SERVICE FOR COMITE v. RANCHO CUCAMONGA

I, Angela Ortell declare

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action, my business address is Richards, Watson & Gershon, 355 South Grand Avenue, 40th Floor, Los Angeles, California 90071 On August 21, 2003, I served the within documents

STIPULATION AND [PROPOSED] ORDER EXTENDING STAY IN THE ACTION PENDING FINALIZATION OF SETTLEMENT AGREEMENT

☐ by causing facsimile transmission of the document(s) listed above from (213) 626-0078 to the person(s) and facsimile number(s) set forth below on this date before 5 00 P M This transmission was reported as complete and without error. A copy of the transmission report(s), which was properly issued by the transmitting facsimile machine, is attached Service by facsimile has been made pursuant to a prior written agreement between the parties

☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below I am readily familiar with the firm's practice for collection and processing correspondence for mailing with the United States Postal Service Under that practice, it would be deposited with the U S Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing contained in this affidavit

☐ by causing personal delivery by First Legal Support Services, 1511 West Beverly Boulevard, Los Angeles, California 90026 of the document(s) listed above to the person(s) at the address(es) set forth below

Thomas A Saenz, Esq
Belinda Escobosa Helzer, Esq
Mexican American Legal Defense and Educational Fund
634 South Spring Street, 11th Floor
Los Angeles, California 90014

I declare under penalty of perjury under the laws of the State of California that the above is true and correct

Executed on August 21, 2003


Angela Ortell