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8 and Officer Kerie Brown, a public employee

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25 Attorneys for Defendant, Sgt. Imran Ahmed

26 **UNITED STATES DISTRICT COURT**  
27 **CENTRAL DISTRICT OF CALIFORNIA**

28 **DESHAWN M. WRIGHT**

Plaintiff,

vs.

**CITY OF SAN BERNARDINO,**  
**IMRAN AHMED, an individual; K.**  
**BROWN, an individual and DOES 1**  
**through 10, inclusive,**

Defendants.

Case No.: 5:22-cv-00132-GW-JC

**JOINT NOTICE OF**  
**CONDITIONAL SETTLEMENT**

1 TO THE HONORABLE COURT AND TO ALL PARTIES AND COUNSEL:

2 PLEASE TAKE NOTICE in accordance with Local Rule 40-2 that the  
3 parties have agreed on a tentative global settlement of this matter, subject to  
4 approval by the City of San Bernardino and execution by plaintiff of a mutually  
5 agreed-upon release.

6 Upon finalization of the settlement, the entire case shall be dismissed with  
7 prejudice.

8 The parties hereby stipulate to vacate all pending dates and stay  
9 proceedings pending full and final resolution of all administrative requirements  
10 and necessary approvals. The parties also respectfully request the Court retain  
11 jurisdiction over this matter for a period of 60 days while the parties work to  
12 finalize the settlement.

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14 DATED: December 12, 2023 CARPENTER, ROTHANS & DUMONT LLP

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*/s/ Scott J. Carpenter*

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By: \_\_\_\_\_

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Steven J. Rothans  
Scott J. Carpenter  
Attorneys for Defendants,  
City of San Bernardino and  
Officer Kerie Brown

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20 DATED: December 12, 2023 SKAPIK LAW GROUP

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*/s/*

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By: \_\_\_\_\_

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Mark J. Skapik  
Geraldyn L. Skapik  
Matthew T. Falkenstein  
Eric C. Morris  
Attorneys for Plaintiff,  
Deshawn M. Wright

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27 ///

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1 DATED: December 12, 2023 JONES & MAYER

2 /s/

3  
4 By: \_\_\_\_\_  
5 Jim Touchstone  
6 Denise L. Rocawich  
7 Attorneys for Defendant,  
8 Sgt. Imran Ahmed

9 Per L.R. 5-4.3.4(a)(2) I hereby attest that all other signatories listed, and on  
10 whose behalf the filing is submitted, concur in the filing's content and have  
11 authorized the filing.

12 DATED: December 12, 2023 CARPENTER, ROTHANS & DUMONT LLP

13 /s/ *Scott J. Carpenter*  
14 By: \_\_\_\_\_  
15 Scott J. Carpenter  
16 Attorneys for Defendants,  
17 City of San Bernardino and  
18 Officer Kerie Brown

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