

1 GAY C. GRUNFELD – 121944  
VAN SWEARINGEN – 259809  
2 MICHAEL FREEDMAN – 262850  
MARC J. SHINN-KRANTZ – 312968  
3 ERIC MONEK ANDERSON – 320934  
ERIC HO – 359738  
4 ROSEN BIEN  
GALVAN & GRUNFELD LLP  
5 101 Mission Street, Sixth Floor  
San Francisco, California 94105-1738  
6 Telephone: (415) 433-6830  
Facsimile: (415) 433-7104  
7 ggrunfeld@rbgg.com  
vswearingen@rbgg.com  
8 mfreedman@rbgg.com  
mshinn-krantz@rbgg.com  
9 eanderson@rbgg.com  
eho@rbgg.com

AARON J. FISCHER – 247391  
LAW OFFICE OF  
AARON J. FISCHER  
1400 Shattuck Square Suite 12 - #344  
Berkeley, California 94709  
Telephone: (510) 806-7366  
Facsimile: (510) 694-6314  
ajf@aaronfischerlaw.com

CHRISTOPHER M. YOUNG – 163319  
DLA PIPER LLP (US)  
4365 Executive Drive, Suite 1100  
San Diego, California 92121-2133  
Telephone: (858) 677-1400  
Facsimile: (858) 677-1401  
christopher.young@dlapiper.com

10 Attorneys for Plaintiffs and the Certified Class and Subclasses  
11 (*defense counsel on following page*)  
12

13 UNITED STATES DISTRICT COURT  
14 SOUTHERN DISTRICT OF CALIFORNIA

15 DARRYL DUNSMORE, ANDREE  
ANDRADE, ERNEST ARCHULETA,  
16 JAMES CLARK, ANTHONY EDWARDS,  
REANNA LEVY, JOSUE LOPEZ,  
17 CHRISTOPHER NORWOOD, JESSE  
OLIVARES, GUSTAVO SEPULVEDA,  
18 MICHAEL TAYLOR, and LAURA  
ZOERNER, on behalf of themselves and all  
19 others similarly situated,

Plaintiffs,

v.

21 SAN DIEGO COUNTY SHERIFF'S  
DEPARTMENT, COUNTY OF SAN  
22 DIEGO, SAN DIEGO COUNTY  
PROBATION DEPARTMENT, and DOES  
23 1 to 20, inclusive,

Defendants.

Case No. 3:20-cv-00406-AJB-DDL

**NOTICE OF MOTION AND  
JOINT MOTION FOR  
PRELIMINARY APPROVAL OF  
MENTAL HEALTH  
SETTLEMENT AGREEMENT  
RESOLVING SECOND CLAIM  
FOR RELIEF**

Judge: Hon. Anthony J. Battaglia

Date: May 28, 2026

Time: 10:00 a.m.

Crtrm.: 4A

1 *(counsel continued from preceding page)*

2 Susan E. Coleman (SBN 171832)  
E-mail: scoleman@bwsllaw.com  
3 BURKE, WILLIAMS & SORESENSEN, LLP  
501 West Broadway, Suite 1600,  
4 San Diego, CA 92101-8474  
Tel: 619.814.5800 Fax: 619.814.6799

5 Elizabeth M. Pappy (SBN 157069)  
E-mail: epappy@bwsllaw.com  
6 BURKE, WILLIAMS & SORESENSEN, LLP  
7 60 South Market Street, Ste. 1000  
San Jose, CA 95113-2336  
8 Tel: 408.606.6300 Fax: 408.606.6333

9 Attorneys for Defendants  
COUNTY OF SAN DIEGO, SAN DIEGO  
10 COUNTY SHERIFF'S OFFICE and SAN DIEGO COUNTY PROBATION  
DEPARTMENT  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



1 The Motion is based upon this Notice of Motion and Motion; the  
2 accompanying Memorandum of Points and Authorities; the attached Declaration of  
3 Gay Crosthwait Grunfeld and the exhibits attached thereto; all pleadings and papers  
4 on file in this action; and any oral argument this Court permits.

5  
6 Respectfully submitted,  
7 DATED: March 3, 2026 ROSEN BIEN GALVAN & GRUNFELD LLP  
8  
9 By: /s/ Gay Crosthwait Grunfeld  
10 Gay Crosthwait Grunfeld  
11 Attorneys for Plaintiffs and the Certified Class  
and Subclasses

12 DATED: March 3, 2026 BURKE, WILLIAMS & SORENSEN, LLP  
13  
14 By: /s/ Elizabeth M. Pappy  
15 Elizabeth M. Pappy  
16 Attorneys for Defendants

17  
18 **SIGNATURE CERTIFICATION**

19 Pursuant to the Court’s Electronic Case Filings Procedures Manual  
20 Section 2(f)(4), I certify that I have obtained consent of all signatories to the  
21 electronic filing of the foregoing document.

22  
23 DATED: March 3, 2026 ROSEN BIEN GALVAN & GRUNFELD LLP  
24  
25 By: /s/ Gay Crosthwait Grunfeld  
26 Gay Crosthwait Grunfeld  
27 Attorneys for Plaintiffs and the Certified Class  
and Subclasses

28