

MILLER BARONDESS, LLP

ATTORNEYS AT LAW
2121 AVENUE OF THE STARS, SUITE 2600 LOS ANGELES, CALIFORNIA 90067
TEL: (310) 552-4400 FAX: (310) 552-8400

MIRA HASHMALL (State Bar No. 216842)
mhashmall@millerbarondess.com
AMNON Z. SIEGEL (State Bar No. 234981)
asiegel@millerbarondess.com
STEVEN G. WILLIAMSON (State Bar No. 343842)
swilliamson@millerbarondess.com
MILLER BARONDESS, LLP
2121 Avenue of the Stars, Suite 2600
Los Angeles, California 90067
Telephone: (310) 552-4400
Facsimile: (310) 552-8400

Attorneys for Defendants
DR. BARBARA FERRER and LOS
ANGELES COUNTY DEPARTMENT
OF PUBLIC HEALTH

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

ERICA JIMENEZ, individually and on
behalf of a class of similarly situated
individuals,

Plaintiff,

v.

DR. ERICA PAN, in her official
capacity as Director of the California
Department of Public Health;
DR. BARBARA FERRER, in her
official capacity as Director of the Los
Angeles County Department of Public
Health; MANUEL CARMONA, in his
official capacity as the Director of
Public Health for the Pasadena Public
Health Department; LOS ANGELES
COUNTY DEPARTMENT OF
PUBLIC HEALTH; and PASADENA
PUBLIC HEALTH DEPARTMENT,

Defendants.

CASE NO. 2:26-cv-03500 SPG (SPx)

**JOINT STIPULATION TO
CONTINUE HEARING ON
DEFENDANTS' MOTIONS TO
DISMISS**

Current Hearing Date

Date: October 7, 2026
Time: 1:30 p.m.
Ctrm: 5C

Proposed Hearing Date

Date: October 28, 2026
Time: 1:30 p.m.
Ctrm: 5C

Assigned to the Hon. Sherilyn Peace
Garnett and Magistrate Judge Sheri Pym

JOINT STIPULATION

Plaintiff Erica Jimenez (“Plaintiff”) and Defendants Dr. Erica Pan, Dr. Barbara Ferrer, Manuel Carmona, Los Angeles County Department of Public Health and Pasadena Public Health Department (collectively “Defendants”) by and through their respective counsel of record, hereby stipulate and agree as follows:

WHEREAS, Plaintiff filed her Complaint against Defendants on April 2, 2026 (Dkt. 1);

WHEREAS, on August 24, 2026, the County and State Defendants each filed Motions to Dismiss Pursuant to Rule 12(b)(1) (Dkts. 39 & 40, the “Motions”) which were joined by Defendant Pasadena Public Health Department (Dkts. 41 & 42);

WHEREAS, the hearing on the Motions was scheduled for September 30, 2026;

WHEREAS, on September 17, 2026, the Court issued its Scheduling Notice and Order (Dkt. 50) and *sua sponte* reset the hearings on the Motions to October 7, 2026;

AND WHEREAS, counsel for the County defendants is unavailable on that date due to preexisting travel and trial obligations;

NOW THEREFORE, IT IS AGREED AND STIPULATED that, subject to the Court’s availability and convenience, the Motions shall be heard on October 28, 2026, or as soon as practicable thereafter.

IT IS SO STIPULATED.

MILLER BARONDESS, LLP
ATTORNEYS AT LAW
2121 AVENUE OF THE STARS, SUITE 2600 LOS ANGELES, CALIFORNIA 90067
TEL: (310) 552-4400 FAX: (310) 552-8400

1 DATED: September 22, 2026

MILLER BARONDESS, LLP

2
3 

4 By:

STEVEN G. WILLIAMSON

Attorneys for Defendants

DR. BARBARA FERRER and LOS
ANGELES COUNTY DEPARTMENT
OF PUBLIC HEALTH

5
6
7
8
9 DATED: September 22, 2026

10
11 By: /s/ Jennifer A. Bunshoft

12 ROB BONTA

13 JENNIFER G. PERKELL

14 JENNIFER A. BUNSHOFT

JENNIFER C. ADDAMS

JOSÉ PABLO GALÁN DE LA CRUZ

Attorneys for Defendant

DR. ERICA PAN, in her official
capacity as Director of the California
Department of Public Health

MILLER BARONDESS, LLP

ATTORNEYS AT LAW

2121 AVENUE OF THE STARS, SUITE 2600 LOS ANGELES, CALIFORNIA 90067

TEL: (310) 552-4400 FAX: (310) 552-8400

MILLER BARONDESS, LLP

ATTORNEYS AT LAW
2121 AVENUE OF THE STARS, SUITE 2600 LOS ANGELES, CALIFORNIA 90067
TEL: (310) 552-4400 FAX: (310) 552-8400

1 DATED: September 22, 2026

2
3
4 By: /s/ Amanda M. Cusick
MICHELE BEAL BAGNERIS
5 ARNOLD F. LEE
6 AMANDA M. CUSICK
Attorneys for Defendants
7 MANUEL CARMONA, in his official
8 capacity as the Director of Public Health
9 for the Pasadena Public Health
10 Department and PASADENA PUBLIC
HEALTH DEPARTMENT

11 DATED: September 22, 2026

PACIFIC LEGAL FOUNDATION

12
13
14 By: /s/ Andrew R. Quinio
15 ANDREW R. QUINIO
16 SAMANTHA R. ROMERO-DREW
Attorneys for Plaintiff

17
18 **ATTESTATION PURSUANT TO LOCAL RULE 5-4.3.4(a)(2)(i)**

19 I, STEVEN G. WILLIAMSON, am the ECF User whose identification and
20 password are being used to file this document. In compliance with Civil Local Rule
21 5-4.3.4(a)(2)(i), I hereby attest that all signatories have concurred in this filing.

22 DATED: September 22, 2026 MILLER BARONDESS, LLP

23
24 
25 By: _____
26 STEVEN G. WILLIAMSON
27 Attorneys for Defendants
28

1
2
3
4
5
6
7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
10

11 ERICA JIMENEZ, individually and on
12 behalf of a class of similarly situated
individuals,

13 Plaintiff,

14 v.

15 DR. ERICA PAN, in her official
16 capacity as Director of the California
Department of Public Health;
17 DR. BARBARA FERRER, in her
official capacity as Director of the Los
18 Angeles County Department of Public
Health; MANUEL CARMONA, in his
19 official capacity as the Director of
Public Health for the Pasadena Public
20 Health Department; LOS ANGELES
COUNTY DEPARTMENT OF
21 PUBLIC HEALTH; and PASADENA
PUBLIC HEALTH DEPARTMENT,

22 Defendants.
23
24
25
26
27
28

CASE NO. 2:26-cv-03500 SPG (SPx)

**[PROPOSED] ORDER GRANTING
JOINT STIPULATION TO
CONTINUE THE HEARING ON
DEFENDANTS' MOTIONS TO
DISMISS [ECF NO. __]**

Assigned to the Hon. Sherilyn Peace
Garnett and Magistrate Judge Sheri Pym

1 On September 22, 2026, Plaintiff and Defendants (collectively, the “Parties”)
2 filed their Joint Stipulation To Continue The Hearing On Defendants’ Motions To
3 Dismiss (“Stipulation”), which is presently set for October 7, 2026 at 1:30 p.m.

4 The Court, having considered the Parties’ Stipulation and finding good cause
5 therefor, hereby GRANTS the Stipulation and ORDERS as follows

6 1. The hearing on Defendants’ Motions to Dismiss (Dkts. 39 & 40) shall
7 be reset to October 28, 2026 at 1:30 p.m.

8
9 IT IS SO ORDERED.

10
11 DATED: _____

12 HON. SHERILYN PEACE GARNETT
13 UNITED STATES DISTRICT JUDGE
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28