

1 DENISE M. HULETT (No. 121553)
2 CHRISTOPHER HO (No. 129845)
3 WILLIE N. NGUYEN (No. 215259)
4 The Legal Aid Society - Employment Law Center
5 600 Harrison Street, Suite 120
6 San Francisco, CA 94107
7 Telephone: (415) 864-8848
8 Facsimile: (415) 864-8199

9 Shaheena Ahmad Simons (SB 225520)
10 MEXICAN AMERICAN LEGAL DEFENSE
11 EDUCATIONAL FUND
12 634 S. Spring Street, 11th Floor
13 Los Angeles, CA 90014
14 Telephone: (213) 629-2512
15 Facsimile: (213) 629-0266

16 Attorneys for Plaintiffs

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

19 MICHAEL BRIONEZ, et al.,) Case No. C-01-3969 CW
20)
21 Plaintiffs,)
22) **PLAINTIFFS' NOTICE OF MOTION AND**
23 v.) **MOTION FOR ENFORCEMENT OF**
24) **COURT-APPROVED SETTLEMENT**
25 UNITED STATES DEPARTMENT OF)
26 AGRICULTURE, et al.,)
27) Date: January 12, 2007
28 Defendants.)
Time: 10:00 a.m.
[Hon. Claudia Wilken]

1 PLEASE TAKE NOTICE THAT on January 12, 2007 at 10 A.M., or as soon thereafter as counsel may
2 be heard, at the Oakland Federal Courthouse, 1200 Clay St., Courtroom 1, 4TH Floor, Oakland,
3 California, 94602, plaintiffs will move the Court for enforcement of the Settlement Agreement in this
4 case, based on Defendants' non-compliance.

5 This motion is based on the accompanying Memorandum of Points and Authorities, the
6 Declaration of Denise M. Hulett and attached exhibits, the Settlement Agreement, the October 9, 2006
7 Report of the Court-Appointed Monitor, and such other evidence that the Court may find appropriate to
8 consider.
9

10 Plaintiffs seek an order requiring Defendants to comply with the HSA and with the supplemental
11 remedies ordered by the Court on March 30, 2006 for an additional two years.
12

13 Dated: November 3, 2006

14 By: /S/ Denise M. Hulett
Denise M. Hulett

15 Attorneys for Plaintiffs
16
17
18
19
20
21
22
23
24
25
26
27
28