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IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

TODD ASHKER, et al.,

Plaintiffs,

v.

**GOVERNOR OF THE STATE OF
 CALIFORNIA, et al.,**

Defendants.

4:09-cv-05796-CW (RMI)

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER RE: FEE
 MOTIONS (ECF Nos. 1935 and 1937)**

Judge: The Honorable Claudia Wilken

Before this Court are Plaintiffs’ fee motion for Quarter 31 and Defendants’ fee motion for Quarter 19. (ECF Nos. 1935 and 1937, collectively “Fee Motions.”) On December 14, 2023, this Court issued tentative rulings regarding the Fee Motions, granting in part and denying in part both motions. (ECF No. 1955.) The Court invited the parties to file supplemental briefing. (*Id.* at 19.)

In the interest of judicial economy and minimizing unnecessary litigation, the parties agree not to challenge the Court’s tentative rulings. The parties make no admissions or concessions by way of this stipulation, but acknowledge that further briefing and litigation of the Fee Motions would be costly and timely, and they have opted instead to avoid any further litigation.

Therefore, the parties stipulate to the following:

1 1. The parties submit to the Court's tentative rulings for the purpose of this settlement
2 (ECF No. 1955);

3 2. Defendants will pay Plaintiffs' counsel \$227,603.68, as outlined in the Court's
4 tentative rulings for Quarters 19 and 31;

5 3. Defendants will pay Plaintiffs' counsel \$121,697.08 to resolve all attorneys' fees and
6 costs after Quarter 31; and

7 4. The parties waive all other claims regarding past, current, or future attorneys' fees
8 and costs.

9 IT IS SO STIPULATED.

10 Dated: January 22, 2024

Respectfully submitted,

11 ROB BONTA
12 Attorney General of California
13 JEFFREY T. FISHER
14 Supervising Deputy Attorney General

15 /s/ Le-Mai D. Lyons
16 LE-MAI D. LYONS
17 Deputy Attorney General
18 Attorneys for Defendants

19 Dated: January 22, 2024


CENTER FOR CONSTITUTIONAL
RIGHTS

20 /s/ Samuel Miller
21 SAMUEL MILLER
22 Attorneys for Plaintiffs

23 ~~PROPOSED~~ ORDER

24 Based on the parties' stipulation, with good cause appearing, the Court APPROVES the
25 parties' stipulation. IT IS SO ORDERED.

26 Dated: January 23, 2024

27 
28 CLAUDIA WILKEN
United States District Judge

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