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10 ATTORNEYS FOR PLAINTIFFS
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12 QUENTIN HALL, SHAWN GONZALES,
ROBERT MERRYMAN, DAWN SINGH,
13 and BRIAN MURPHY on behalf of
themselves and all others similarly situated,

14 Plaintiffs,

15 v.

16 COUNTY OF FRESNO,

17 Defendant.

Case No. 1:11-CV-02047-LJO-BAM

STIPULATION AND PROPOSED ORDER

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1 On November 2, 2015, the Court approved the Consent Decree in this action, which includes a
2 procedure by which plaintiffs collect payment for attorneys’ fees and costs incurred in connection
3 with the Consent Decree. Although the Court’s Order dismissed the action, the Court specifically
4 retained “continuing jurisdiction to interpret, implement and enforce the settlement, and all orders
5 and judgement entered in connection therewith.” Order at 3 [Dkt. No. 179].
6

7 Pursuant to the Consent Decree, the defendants have, for the first three years of the
8 remedial phase, paid a flat fee of \$40,000 per year to plaintiffs for fees and costs incurred in the
9 remedial phase of this action, delivered at the beginning of each monitoring year following
10 approval of the Consent Decree. Recognizing that plaintiffs’ monitoring work in this remedial
11 phase has been more encompassing than the parties had reasonably anticipated, the parties now
12 agree that, within 60 days of the beginning of the fourth monitoring year, defendants shall deliver
13 payment of \$60,000 for plaintiffs’ fees and costs. In subsequent monitoring years, defendants
14 shall deliver to plaintiffs \$18,750 on a quarterly basis for the duration of the Consent Decree,
15 within 30 days of each calendar quarter of monitoring.
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17 WHEREFORE, defendants agree to pay plaintiffs’ counsel

- 18 • \$60,000 by January 3, 2019 for the fourth year of monitoring in this action; and
- 19 • \$18,750 on a quarterly basis for the duration of the Consent Decree within 30 days
20 of each calendar quarter, following the fourth year of monitoring.
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AGREED TO BY THE PARTIES:

Dated: September 17, 2018

PRISON LAW OFFICE

/s/ Alison Hardy
Alison Hardy

*Attorneys for Plaintiff Quentin Hall, Shawn
Gonzales, Robert Merryman, Brian Murphy,
Dawn Singh, and the Plaintiff Class*

Dated: September 24, 2018

FRESNO COUNTY COUNSEL

/s/ Daniel Cederborg
Daniel Cederborg
Attorney for Defendants

I, Alison Hardy, attest that Dan Cederborg signed this document on September 24, 2018.

IT IS SO ORDERED.

Dated: October 3, 2018

/s/ Lawrence J. O'Neill
UNITED STATES CHIEF DISTRICT JUDGE