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6 Attorney for Plaintiff

7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA

9 TIM CORONADO, JR,)

Case No. 1:15-CV-00806-AWI-SAB

10 Plaintiff)

**STIPULATION AND PROPOSED
ORDER FOR AWARD OF ATTORNEY'S
FEES AND COSTS UNDER THE EQUAL
ACCESS TO JUSTICE ACT (EAJA)**

11 v.)

12 COMMISSIONER OF SOCIAL)
13 SECURITY,)

14 Defendant)
15)
16)

17 IT IS HEREBY STIPULATED by and between the parties through their undersigned counsel,
18 subject to the approval of the Court, that Plaintiff shall be awarded attorney's fees under the Equal
19 Access to Justice Act (EAJA), 28 U.S.C. sec. 2412(d), in the amount of FOUR THOUSAND dollars
20 and ZERO cents (\$4,000.00). This amount represents compensation for all legal services rendered on
21 behalf of Plaintiff by counsel in connection with this civil action, in accordance with 28 U.S.C. §
22 2412(d). The parties also agree that Plaintiff shall be awarded costs in the amount of \$400.00,
pursuant to 31 U.S.C. §1304 and 28 U.S.C. §1920.

23 After the Court issues an order for payment of EAJA fees and expenses to Plaintiff, the
24 government will consider the matter of Plaintiff's assignment of EAJA fees and expenses to
25 Plaintiff's attorney. The government's ability to honor the assignment will depend on whether the
26 fees and expenses are subject to an offset allowed under the United States Department of the
27 Treasury's Offset Program pursuant to Astrue v. Ratcliff, 130 S.Ct. 2521 (2010). After the order of
28 EAJA fees and expenses is entered, the government will determine if they are subject to an offset. If
it is determined that Plaintiff's EAJA fees and expenses are not subject to an offset under Astrue v.

1 Ratcliff, 130 S.Ct. 2521 (2010) and the Department of Treasury's Offset Program, then the check for
2 EAJA fees shall be made payable to Plaintiff's attorney, Jacqueline A. Forslund, based upon
3 Plaintiff's assignment of these amounts to Plaintiff's attorney, and the check for costs shall be made
4 payable to Plaintiff, Tim Coronado. The parties agree that whether these checks are made payable to
5 Plaintiff or Jacqueline A. Forslund, such checks shall be mailed to Plaintiff's attorney at the
6 following address: Jacqueline A. Forslund, Forslund Law LLC, P.O. Box 4476, Sunriver, Oregon
7 97707. This stipulation constitutes a compromise settlement of Plaintiff's request for EAJA attorney
8 fees, and does not constitute an admission of liability on the part of Defendant under the EAJA or
9 otherwise. Payment of the agreed amount shall constitute a complete release from, and bar to, any
10 and all claims that Plaintiff and/or Plaintiff's Counsel may have relating to EAJA attorney fees in
11 connection with this action.

12 Respectfully submitted,

13 Date: June 9, 2017

JACQUELINE A. FORSLUND
Attorney at Law

15 /s/Jacqueline A. Forslund
16 JACQUELINE A. FORSLUND
Attorney for Plaintiff

17 Date: June 9 2017

18 PHILIP A. TALBERT
United States Attorney
19 DEBORAH STACHEL
Regional Chief Counsel, Region IX
20 Social Security Administration

21 /s/In Seon Jeong
22 IN SEON JEONG
Special Assistant United States Attorney
23 *By email authorization
24 Attorney for Defendant

ORDER

APPROVED AND SO ORDERED

IT IS SO ORDERED.

Dated: June 12, 2017



SENIOR DISTRICT JUDGE

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