

Michael G. Marderosian, No. 77296
Heather S. Cohen, No. 263093
MARDEROSIAN & COHEN
1260 Fulton Street
Fresno, CA 93721
Telephone: (559) 441-7991
Facsimile: (559) 441-8170

Virginia Gennaro, No. 138877
City Attorney
CITY OF BAKERSFIELD
1501 Truxtun Avenue
Bakersfield, CA 93301
Telephone: (661) 326-3721
Facsimile: (661) 852-2020

Attorneys for: Defendants CITY OF BAKERSFIELD, BAKERSFIELD POLICE
DEPARTMENT OFFICER CHRISTOPHER MOORE, BAKERSFIELD
POLICE DEPARTMENT SENIOR OFFICER GEORGE VASQUEZ

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

TATYANA HARGROVE,

Plaintiff,

VS.

CITY OF BAKERSFIELD, BAKERSFIELD
POLICE DEPARTMENT OFFICER
CHRISTOPHER MOORE, BAKERSFIELD
POLICE DEPARTMENT SENIOR OFFICER
G. VAZQUEZ,

Defendants.

) Case No. 1:17-CV-01743-JLT

**STIPULATION FOR WAIVER OF FEES
AND COSTS IN EXCHANGE FOR WAIVER
OF RIGHT TO APPEAL AND [PROPOSED]
ORDER THEREON**

1 Plaintiff TATYANA HARGROVE (“Plaintiff”) and Defendants CITY OF BAKERSFIELD,
2 BAKERSFIELD POLICE DEPARTMENT OFFICER CHRISTOPHER MOORE, and BAKERSFIELD
3 POLICE DEPARTMENT SENIOR OFFICER GEORGE VASQUEZ (“Defendants”), by and through
4 their counsel of record, hereby stipulate to the terms and conditions on this stipulation and jointly request
5 that the court enter its Order at the end of this document.

6 **RECITALS**

7 WHEREAS, the Court entered Judgment in favor of Defendants and against Plaintiff on October
8 21, 2019.

9 WHEREAS, Defendants are entitled to their costs incurred in defense of this action and have
10 agreed to waive those costs in exchange for Plaintiff’s waiver of her right to appeal the Judgment of this
11 case.

12 WHEREAS, Plaintiff has a right to appeal the Court’s Judgment and has agreed to waive her right
13 to appeal in exchange for a waiver of costs and fees by the Defendants.

14 **STIPULATION**

15 Therefore, the Parties agree as follows:

16 Plaintiff agrees to waive her right to all appealable issues arising in and from this action, including
17 but not limited to the October 21, 2019 Judgment in exchange for Defendants’ waiver of all claims for
18 costs and fees arising from this litigation.

19 Dated: October 26, 2019

ALDERLAW, P.C.

20 */s/ Neil K. Gehlawat*

21 By: _____

22 Neil K. Gehlawat
23 Attorneys for Plaintiff
TATYANA HARGROVE

24 Dated: October 26, 2019

THE LAW OFFICE OF THOMAS C. SEABAUGH

25 */s/ Thomas C. Seabaugh*

26 By: _____

27 Thomas C. Seabaugh
28 Attorneys for Plaintiff
TATYANA HARGROVE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: October 26, 2019

MARDEROSIAN & COHEN

/s/ Michael G. Marderosian
By: _____
Michael G. Marderosian,
Attorneys for Defendants
above-named.

ORDER

Upon good cause being shown as set forth in the Stipulation of legal counsel for the Parties, the Court hereby adopts the Stipulation.

IT IS SO ORDERED.

Dated: **October 26, 2019**

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE