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6	Attorneys for Plaintiffs Elmer and Kathy Buick		
7	UNITED STATES DISTRICT COURT		
8	FOR THE EASTERN DISTRICT OF CALIFORNIA		
9			
10	ELMER and KATHY BUICK	Case No: 2:07-CV-01447-MCE-KJM	
11	Plaintiffs,	STIPULATION AND ORDER	
12	vs.	PERMITTING PLAINTIFFS' APPLICATION FOR ATTORNEYS'	
13	WORLD SAVINGS BANK,	FEES AND COSTS PURSUANT TO SETTLEMENT TO BE FILED UNDER	
14	TRANSAMERICAN FINANCIAL	SEAL	
15	CORPORATION,	Action Filed: May 15, 2007	
16	Defendants.	Trial Date: February 7, 2011	
17		Honorable Morrison C. England, Jr.	
18	RECITALS		
19	The parties named below, through their respective counsel, hereby stipulate and agree		
20	as follows:		
21	1. On December 22, 2008, this Court entered the Stipulated Protective Order (Dkt.		
22	45) to govern confidential documents in this case.		
23	2. On November 4, 2009, Plaintiffs' and World Savings Bank, FSB, n/k/a		
24	Wachovia Mortgage, FSB, (hereinafter "Wachovia") entered into a confidential Settlement		
25	Agreement and Release resolving their respective claims and defenses in this action which the		
26	parties to the settlement have agreed will be governed by the terms of the Stipulated Protective		
27	Order, and designated as "HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY."		
28	3. Plaintiff's Application for Attorneys' Fees and Costs Pursuant to Settlement and		
	STIPULATION AND [PROPOSED] ORDER PERMITTING BE FILED UNDER SEAL	PLAINTIFFS' APPLICATION FOR ATTORNEYS' FEES TO	

1 supporting declarations include a copy of the confidential Settlement Agreement and Release 2 and reference the specific terms of the confidential settlement throughout.

3 4. Plaintiffs hereby respectfully request that the Court grant an Order permitting 4 Plaintiffs' to file the Application for Attorneys' Fee Pursuant to Settlement and supporting 5 documents under seal.

6 5. Under the terms of the settlement agreement, Wachovia has the right to oppose 7 Plaintiff's Application for Attorneys' Fees and Costs. Wachovia joins in this request to file 8 documents under seal, and seeks an order that its opposition papers also be filed under seal.

9 6. Transamerican Financial Corporation does not oppose this request, or the 10 designation of the Settlement Agreement and Release as "HIGHLY CONFIDENTIAL -11 ATTORNEY'S EYES ONLY," for the limited purpose of permitting Plaintiff's Application for 12 Attorneys' Fees and Costs, and any opposing papers, to be filed under seal. Transamerican 13 Financial Corporation does not waive, and reserves its right, to contest the confidential 14 designation of the Settlement Agreement and Release pursuant to the terms of the Stipulated Protective Order. 15

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STIPULATION

17 Based upon the facts set forth in paragraphs above, the Plaintiffs and Wachovia hereby 18 stipulate to the filing of Plaintiffs' Application for Attorneys' Fee Pursuant to Settlement, 19 supporting documents, and opposing papers, if any, under seal.

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STIPULATION AND [PROPOSED] ORDER PERMITTING PLAINTIFFS' APPLICATION FOR ATTORNEYS' FEES TO BE FILED UNDER SEAL

1	I hereby attest that I have received approval to file this document from the other		
2	signatories whose signatures are indicated below by a "conformed" signature (/s/).		
3			
4		Respectfully submitted,	
5	DATED: March 25, 2010	CONSUMER LAW OFFICE OF MARIE NOEL APPEL	
6	Diffild. Watch 25, 2010	THE LAW OFFICES OF DANIEL HARRIS	
7		/s/ Marie Noel Appel	
8		Marie Noel Appel, Attorneys for Plaintiffs ELMER AND KATHY BUICK	
9		ELMER AND KATHT DUICK	
10	DATED: March 25, 2010	REED SMITH LLP	
11		/s/ Gary S. Caplan	
12		Gary S. Caplan, Attorneys for Defendant	
13		WORLD SAVINGS BANK, FSB	
14	Dated: March 25, 2010	THE LAW OFFICES OF BRIAN DEAMICIS	
15		/s/ Brian DeAmicis	
16		Brian DeAmicis, Attorneys for Defendant TRANSAMERICAN FINANCIAL CORP.	
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18		ORDER	
19	Pursuant to the foregoing Stipulation of the parties, and good cause appearing therefore,		
20			
20	the Court hereby orders that Plaintiffs' Application for Attorneys' Fee Pursuant to Settlement,		
	supporting documents, and opposition papers be filed under seal.		
22	IT IS SO ORDERED.		
23	DATED: March 25, 2010	11 DED	
24		Marna IAXI.	
25 25		MORRISON C. ENGLAND, JR	
26		UNITED STATES DISTRICT JUDGE	
27			
28			
	STIPULATION AND [PROPOSED] ORDER PERMITTING PLAINTIFFS' APPLICATION FOR ATTORNEYS' FEES TO BE FILED UNDER SEAL		