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 13 PUBLIC LIBRARY AUTHORITY*

15 **UNITED STATES DISTRICT COURT**  
 16 **EASTERN DISTRICT OF CALIFORNIA**

18	CONNIE ARNOLD	) Case No.: 12-CV-01998-LKK-EFB
19		)
20	Plaintiff,	) <b>STIPULATION AND REQUEST TO</b>
21		) <b>SET FILING DEADLINE FOR</b>
22	vs.	) <b>PLAINTIFF'S MOTION FOR FEES</b>
23		) <b>AND COSTS</b>
24	COUNTY OF SACRAMENTO;	) <u>Current Dates</u>
25	SACRAMENTO PUBLIC LIBRARY	) Order on Stipulated Consent Decree
26	AUTHORITY; SUNRISE	) Issued On: 8/22/2013
27	RECREATION & PARK DISTRICT;	)
28	and DOES 1 through 50, inclusive,	) <u>Requested Dates</u>
		) Last Day to File Motion for Fees and
	Defendants.	) Costs: 10/21/2013
		)

1 IT IS HEREBY STIPULATED AND REQUESTED, by and between Plaintiff  
2 CONNIE ARNOLD (“Plaintiff”) and Defendants COUNTY OF SACRAMENTO  
3 and SACRAMENTO PUBLIC LIBRARY AUTHORITY (“Defendants”)  
4 (hereinafter, collectively “the Parties”), by and through their counsel of record as  
5 follows:

6 1. On July 31, 2012, Plaintiff filed a Complaint in this action seeking  
7 injunctive relief only; Plaintiff waived her claim for damages to focus efforts on  
8 comprehensive injunctive relief.

9 2. On August 6, 2013, the Parties filed a stipulated Consent Decree for  
10 Settlement of Plaintiff’s Injunctive Relief Claims, which was ordered by the Court on  
11 August 22, 2013.

12 3. There are no other claims left in this matter except for Plaintiff’s claims  
13 for attorneys’ fees and costs.<sup>1</sup>

14 4. The Parties are in negotiations to resolve Plaintiff’s claims for attorneys’  
15 fees and costs without incurring additional fees associated with filing a motion for  
16 fees and costs.

17 5. Although the Parties do not believe the timing requirements for filing a  
18 motion for fees and costs under Fed. R. Civ. P. 54 apply at this time, the Parties  
19 request that the Court order said motion to be filed by October 21, 2013 to give the  
20 Parties adequate time to exhaust settlement efforts.

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28 <sup>1</sup> Plaintiff already reached full resolution of all her claims with remaining Defendant Sunrise Recreation & Park District.

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Dated: September 5, 2013

**METZ & HARRISON, LLP**

By: /s/ Mary J. Lim  
JEFF A. HARRISON  
MARY J. LIM  
Attorneys for Plaintiff, CONNIE ARNOLD

Dated: September 5, 2013

**RIVERA & ASSOCIATES**

By: /s/ Jonathan B. Paul (as authorized on 9.05.13)  
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JONATHAN B. PAUL  
Attorneys for Defendants COUNTY OF  
SACRAMENTO and SACRAMENTO  
PUBLIC LIBRARY AUTHORITY