

1 BENJAMIN B. WAGNER
 United States Attorney
 2 DONNA L. CALVERT
 Regional Chief Counsel, Region IX,
 3 Social Security Administration
 PAUL SACHELARI, CSBN 230082
 4 Special Assistant United States Attorney
 5 Social Security Administration
 160 Spear St., Suite 800
 6 San Francisco, CA 94105
 Telephone: (415) 977-8933
 7 Facsimile: (415) 744-0134
 8 Email: paul.sachelari@ssa.gov
 Attorneys for Defendant

10 UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA
 11 SACRAMENTO DIVISION

12 NOREEN LYNETTE THOMPSON,)	No. 2:13-cv-01787-EFB
)	
13)	
14 Plaintiff,)	STIPULATION FOR AWARD OF EAJA
)	FEEES
15 v.)	
16 CAROLYN W. COLVIN, Acting)	
Commissioner of Social Security,)	
)	
17)	
18 Defendant.)	
19)	

20
 21 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, and with
 22 the approval of the Court as provided below, that Plaintiff be awarded attorney fees under the Equal
 23 Access to Justice Act (EAJA), 28 U.S.C. § 2412(d), in the amount of six thousand dollars
 24 (\$6,000.00), under 28 U.S.C. § 1920. This amount represents compensation for all legal services
 25 rendered on behalf of Plaintiff by counsel in connection with this civil action, in accordance with 28
 26 U.S.C. §§ 1920, 2412(d).
 27
 28

1 After the Court issues an order for EAJA fees to Plaintiff, the government will consider the
2 matter of Plaintiff's assignment of EAJA fees to Plaintiff's attorney. Pursuant to Astrue v. Ratliff,
3 130 S. Ct. 2521 (U.S. June 14, 2010), the ability to honor the assignment will depend on whether the
4 fees are subject to any offset allowed under the United States Department of the Treasury's Offset
5 Program. After the order for EAJA fees is entered, the government will determine whether they are
6 subject to any offset.

7 Fees and costs shall be made payable to Plaintiff, but if the Department of the Treasury
8 determines that Plaintiff does not owe a federal debt, then the government shall cause the payment of
9 fees and costs to be made directly to plaintiff's counsel Shellie Lott, pursuant to the assignment
10 executed by Plaintiff. Any payments made shall be delivered to Plaintiff's counsel Shellie Lott.

11 This stipulation constitutes a compromise settlement of Plaintiff's request for EAJA attorney
12 fees and does not constitute an admission of liability on the part of Defendant under the EAJA.
13 Payment of the agreed amount shall constitute a complete release from, and bar to, any and all claims
14 that Plaintiff and/or Plaintiff's counsel may have relating to EAJA attorney fees connection with this
15 action.

16
17 Respectfully submitted,

18 Date: June 23, 2015

Cerney Kreuze & Lott, LLP

19
20 By: /s/ Shellie Lott*
21 SHELLIE LOTT

*By email authorization

22 Attorney for Plaintiff

23
24 ////

25 ////

26 ////

27 ////

28

1 BENJAMIN B. WAGNER
2 United States Attorney
3 DONNA L. CALVERT
4 Regional Chief Counsel, Region IX,
5 Social Security Administration

6 By: /s/ Paul Sachelari
7 PAUL SACHELARI
8 Special Assistant United States Attorney
9 Attorneys for Defendant

10 ORDER

11 APPROVED AND SO ORDERED.

12
13 DATED: June 29, 2015.

14 
15 EDMUND F. BRENNAN
16 UNITED STATES MAGISTRATE JUDGE
17
18
19
20
21
22
23
24
25
26
27
28