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 EASTERN DISTRICT OF CALIFORNIA
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12
 13 UNITED STATES DISTRICT COURT
 14 EASTERN DISTRICT OF CALIFORNIA
 15 SACRAMENTO DIVISION
 16

17 WILLIAM A. SASSMAN,
 18 Plaintiff,
 19 v.

Case No. 2:14-cv-01679-MCE-KJN

**STIPULATION AND ORDER FOR
 EXTENSION OF TIME TO FILE FEE
 APPLICATION**

20 EDMUND G. BROWN, JR. Governor of
 California, and JEFFREY A. BEARD,
 21 Secretary of the California Department of
 Corrections and Rehabilitation, in their
 22 official capacities, and DOES 1-10,
 23 Defendants.

Judge: Hon. Morrison C. England, Jr.
 Crtrm: 7, 14th Floor

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1 WHEREAS, the Court entered its Memorandum and Order (Dkt. No. 77) granting
2 summary judgment for Plaintiff William Sassman ("Plaintiff") on September 9, 2015, and
3 issued a Judgment (Dkt. No. 78) in favor of Plaintiff on that same date; and

4 WHEREAS, on December 1, 2015, per the parties' stipulation, the Court ordered
5 that the deadline for Plaintiff to file his application for attorneys' fees and costs be set for
6 January 11, 2016 (Dkt No. 98);

7 WHEREAS, the parties are currently negotiating regarding a potential settlement of
8 Plaintiff's attorneys' fees and costs, which could obviate the need for the Court to
9 adjudicate a fee motion in this case. However, the parties do not believe that the
10 January 11, 2016 deadline will provide sufficient time for a formal resolution to be reached
11 to avoid the need for Plaintiff to prepare his application; and

12 WHEREAS, the parties to the above-captioned case, through their counsel of
13 record, have therefore agreed to a short extension of the time to submit an application for
14 attorneys' fees and costs, in an effort to attempt to resolve this matter without the need for
15 a fee application to the Court;

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1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and
2 between the parties, through their counsel of record, that Plaintiff shall have an extension
3 of time up to and including February 10, 2016, in which to submit an application for
4 attorneys' fees and costs. By entering into this stipulation, Defendants do not waive their
5 right to appeal or the right to object to costs or attorneys' fees.

6 IT IS SO STIPULATED.

7 DATED: December 22, 2015

ROSEN BIEN GALVAN & GRUNFELD LLP

8 By: /s/ Gay Crosthwait Grunfeld
9 Gay Crosthwait Grunfeld

10 Attorneys for Plaintiff

11 DATED: December 22, 2015

KAMALA D. HARRIS
12 Attorney General of California

13 By: /s/ Martine N. D'Agostino
14 Martine N. D'Agostino
15 Deputy Attorney General

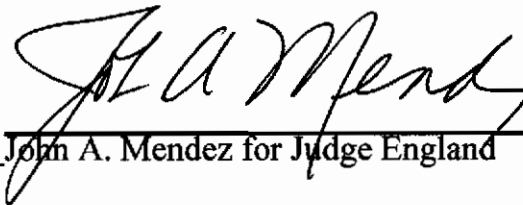
16 Attorneys for Defendants
17 Edmund G. Brown Jr. and Jeffrey A. Beard, Ph.D.

18 **ORDER**

19 The Court, having reviewed the above stipulation of the parties, and good cause
20 appearing, hereby orders that the deadline for Plaintiff to file his application for attorneys'
21 fees and costs is hereby extended up to and including February 10, 2016.

22 IT IS SO ORDERED.

23 DATED: January 7, 2016

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John A. Mendez for Judge England