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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 SCOTT KERNAN,¹
 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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26 ¹ Under Federal Rule of Civil Procedure 25(d), Defendants substitute current CDCR
 27 Secretary Scott Kernan for Jeffrey Beard, who was named as a Defendant in his official
 28 capacity.

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 January 7, 2016, per the parties’ stipulation, the Court ordered that
5 the deadline for Plaintiff to file his application for attorneys’ fees and costs be set for
6 February 10, 2016 (Dkt No. 102);

7 WHEREAS, the parties are in the final stages of negotiating a resolution regarding
8 Plaintiffs’ fees and costs, which would obviate the need for the Court to adjudicate a fee
9 motion in this case. However, the parties do not believe that the February 10, 2016
10 deadline will provide sufficient time for a formal resolution to be reached to avoid the need
11 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 March 11, 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: January 29, 2016 ROSEN BIEN GALVAN & GRUNFELD LLP

8 By: /s/ Gay Crosthwait Grunfeld
9 Gay Crosthwait Grunfeld
10 Attorneys for Plaintiff

11 DATED: January 29, 2016 KAMALA D. HARRIS
12 Attorney General of California

13 By: /s/ Jay C. Russell
14 Jay C. Russell
15 Supervising Deputy Attorney General
16 Attorneys for Defendants
17 Edmund G. Brown Jr. and Scott Kernan

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 March 11, 2016.

22 IT IS SO ORDERED.

23 Dated: February 2, 2016

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25 MORRISON C. ENGLAND, JR., CHIEF JUDGE
26 UNITED STATES DISTRICT COURT