

1 GAY CROSTHWAIT GRUNFELD – 121944  
 BLAKE THOMPSON – 255600  
 2 VAN SWEARINGEN – 259809  
 ROSEN BIEN GALVAN & GRUNFELD LLP  
 3 50 Fremont Street, 19th Floor  
 San Francisco, California 94105-2235  
 4 Telephone: (415) 433-6830  
 Facsimile: (415) 433-7104  
 5 Email: ggrunfeld@rbgg.com  
 bthompson@rbgg.com  
 6 vswearingen@rbgg.com

7 CAROL STRICKMAN – 078341  
 LEGAL SERVICES FOR PRISONERS WITH CHILDREN  
 8 1540 Market Street, Suite 490  
 San Francisco, California 94102  
 9 Telephone: (415) 255-7036  
 Facsimile: (415) 552-3150  
 10 Email: carol@prisonerswithchildren.org

11 Attorneys for Plaintiff

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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.

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.

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

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

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

Trial Date: None Set

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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 September 28, 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 December 4, 2015 (Dkt No. 82);

7 WHEREAS, the parties have begun negotiations regarding a potential settlement of  
8 Plaintiffs’ 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 December 4, 2015 deadline will provide sufficient time for a formal resolution to be  
11 reached 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;

16 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and  
17 between the parties, through their counsel of record, that Plaintiff shall have an extension  
18 of time up to and including January 11, 2016, in which to submit an application for  
19 attorneys’ fees and costs. By entering into this stipulation, Defendants do not waive their  
20 right to appeal or the right to object to costs or attorneys’ fees.

21 IT IS SO STIPULATED.

22  
23 DATED: November 19, 2015

ROSEN BIEN GALVAN & GRUNFELD LLP

24 By: /s/ Gay Crosthwait Grunfeld

25 Gay Crosthwait Grunfeld

26 Attorneys for Plaintiff  
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DATED: November 19, 2015

KAMALA D. HARRIS  
Attorney General of California

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

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

**ORDER**

The Court, having reviewed the above stipulation of the parties, and good cause appearing, hereby orders that the deadline for Plaintiff to file his application for attorneys' fees and costs is hereby extended up to and including January 11, 2016.

IT IS SO ORDERED.

Dated: November 30, 2015

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