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5 *Attorneys for Plaintiff*

8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

11 JESSE FLORES,
12 Plaintiff,
13 vs.
14 CAROLYN W. COLVIN,
Acting Commissioner of Social Security,
15 Defendant,

2:14-CV-2650-AC

STIPULATION AND PROPOSED ORDER

17 IT IS HEREBY STIPULATED by and between the parties, through their assigned counsel,
18 subject to the Court's approval, that plaintiff be awarded attorney fees under the Equal Access to Justice
19 Act, (EAJA) in the amount of SIX THOUSAND, SEVEN HUNDRED AND FIFTY DOLLARS
20 (\$6,750.00). This amount represents compensation for all legal services counsel rendered on behalf of
21 Plaintiff in connection with this civil action, in accordance with 28 U.S.C. section 2412(d).

22 This stipulation constitutes a compromise settlement of Plaintiff's request for EAJA attorney fees
23 and does not constitute an admission of liability on the part of Defendant under EAJA. Payment of the
24 agreed amount shall constitute a complete release from, and bar to, any and all claims that Plaintiff may
25 have relating to EAJA attorney fees and expenses in connection with this action.

26 This award is without prejudice to the rights of Plaintiff's counsel to seek Social Security Act
27 attorney fees under 42 U.S.C. § 406, subject to the offset provisions of the EAJA.

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Respectfully submitted,

Dated: April 25, 2016

/s/ Stephen A. Valizan
STEPHEN A. VALIZAN
Attorney for Plaintiff

Dated: April 25, 2016

BENJAMIN B. WAGNER
United States Attorney

DEBORAH LEE STACHEL
Acting Regional Chief Counsel, Region IX
Social Security Administration

By: /s/ Heather Moss
HEATHER MOSS
(*as authorized via e-mail on April 25, 2016)
Special Assistant United States Attorney

Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED:

Dated: April 27, 2016

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE