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 8 IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

9
 10 ROBERT O. GILMORE, et al.,)
 11 Plaintiffs,)
 12 v.)
 13 STATE OF CALIFORNIA, et al.,)
 14 Defendants.)
 15 _____)

No. C 66-45878 SI

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND DATE FOR
 FILING MOTION FOR
 ATTORNEY’S FEES**

Local Rules 6-1(b), 6-2

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Gilmore v. California, No. 66-45878 SI, Stipulated Request

1 THE PARTIES, BY AND THROUGH THEIR COUNSEL, HEREBY STIPULATE
2 AND AGREE AS FOLLOWS:

3 1. On April 20, 2010, this Court issued its order granting defendants' motion
4 to terminate the injunction and ending this Court's jurisdiction in this matter.

5 2. Under Local Rule 54-5(a), plaintiffs are required to move for an award of
6 attorney's fees within 14 days of entry of judgment by the District Court, unless
7 otherwise ordered by the Court after a stipulation or motion to enlarge time.

8 3. Local Rule 54-5(b) requires the plaintiffs to make a good faith effort to
9 meet and confer with defendants in an effort to resolve any fee disputes before filing a
10 motion for attorney fees.

11 4. The parties initiated the meet and confer process on April 21, 2010.
12 Declaration of Alison Hardy in Support of Stipulated Request, ¶¶ 3-5. The parties agree
13 that some fee disputes may be resolved, and that additional time is necessary for the
14 parties to adequately prepare the billing records for the lengthy litigation and to
15 competently meet and confer regarding plaintiffs' fee request.

16 5. As this Court has granted defendants' motion to terminate, enlarging time
17 to permit the parties to negotiate a possible fee agreement will have no effect on the case
18 itself.

19 6. The parties jointly seek to extend the date for filing plaintiffs' motion for
20 attorney's fees so that the parties may meet and confer to narrow the scope of, or possibly
21 avoid entirely, plaintiff's motion. Accordingly, the parties jointly request that the time
22 for filing plaintiff's motion be enlarged by 90 days, making it due on July 19, 2010.

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1 **IT IS SO STIPULATED.**

2 Dated: April 23, 2010

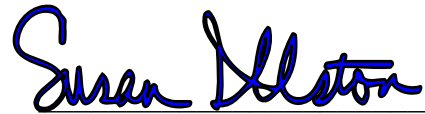
By: /s/ Alison Hardy
ALISON HARDY
Prison Law Office
Attorney for Plaintiffs

6 Dated: April 23, 2010

By: /s/ Damon McClain
Damon McClain
Deputy Attorney General
Attorney for Defendants

9 **IT IS SO ORDERED.**

11 DATED: _____


Hon. SUSAN ILLSTON
United States District Court

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