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6 WAYNE KEVIN VERNON

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9 UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 WAYNE KEVIN VERNON, an individual,

12 Plaintiff,

13 vs.

14 CITY AND COUNTY OF SAN FRANCISCO;
OFFICER GEORGE PEREZ, an individual, and
15 DOES 1-30, in their individual capacities as
Police Officers, high ranking officials and/or
16 employees of the CITY AND COUNTY OF
SAN FRANCISCO,

17 Defendants.
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Case No. C 07-01286 CRB

**STIPULATION TO PERMIT
PLAINTIFF'S COUNSEL TO FILE,
PARTIALLY UNDER SEAL, A
MOTION TO WITHDRAW AS
COUNSEL AND TO STAY ENTRY OF
JUDGMENT ON THE CITY'S MOTION
FOR FEES AND COSTS**

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20 As to Court's Order granting in part and denying in part the City's motion to recover
21 attorney's costs and fees, the parties hereby stipulate to allow plaintiff's counsel to file, partially
22 under seal, a motion to withdraw as counsel and, pending resolution of that motion, to stay entry
23 of judgment on the City's motion to recover costs and attorney's fees.

24 If permitted by the Court, plaintiff's counsel's motion to withdraw will contain private
25 information related to Plaintiff Wayne Vernon, as well as information protected by the attorney-
26 client privilege concerning Plaintiff's location and counsel's ability to contact him. Declaration
27 of Matt Springman ISO request to permit plaintiff's counsel to file under seal, at ¶ 2. Given the
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1 confidential and privileged information contained in Plaintiff's counsel's motion, it would be a
2 violation of Mr. Vernon's rights if this document were filed publicly. Springman Dec. at ¶ 3.

3 Additionally, according to Local Rule 79-5(a), Plaintiffs' counsel's motion filed under
4 seal is narrowly tailored to redact only sealable material. Also, according to Local Rule 79-5(c),
5 Plaintiff's counsel will lodge copies of both the redacted and unredacted versions of the motion
6 with the Court. Plaintiff will also serve the City with a redacted version. Springman Dec. at ¶ 4.

7 Therefore, plaintiff's counsel, pursuant to the parties' stipulation, respectfully requests
8 that this Court permit plaintiff's counsel to file, partially under seal, a motion to withdraw as
9 counsel and, pending resolution of that motion, to stay entry of judgment on the City's motion to
10 recover costs and attorney's fees.

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12 DATED: December 10, 2008

GONZALEZ & LEIGH, LLP

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14 By: /s/ Matt Springman
15 Matt Springman
16 Attorney for Plaintiff
WAYNE KEVIN VERNON

17 DATED: December 10, 2008

OFFICE OF THE CITY ATTORNEY

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19 By: /s/ Daniel Zaheer
20 Daniel Zaheer
21 Deputy City Attorney
22 Attorneys for Defendants
City and County of San Francisco, et al.

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IT IS SO ORDERED.

Good cause appearing and pursuant to the stipulation of the parties, the Court hereby grants plaintiff's request to file, partially under seal, their motion to stay entry of judgment on the City's Motion to recover Costs and Fees and to withdraw as counsel.

Dated: December 11, 2008

