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5 Attorneys for Defendants
6 CITY OF SANTA ROSA; RICH CELLI, an individual and Officer of the
SANTA ROSA POLICE DEPARTMENT; TRAVIS MENKE,
7 an individual and Officer of the SANTA ROSA POLICE DEPARTMENT;
and PATRICIA MANN, an individual and Officer of the
8 SANTA ROSA POLICE DEPARTMENT

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 PATRICIA DESANTIS, et al.,

Case No. C 07-3386 JSW

13 Plaintiffs,

14 v.

**STIPULATION AND ~~PROPOSED~~
ORDER PERMITTING AMENDMENT
TO PLAINTIFFS' BILL OF COSTS**

15 CITY OF SANTA ROSA, et al.,

16 Defendants.
17 _____/

18 WHEREAS Plaintiffs Patricia DeSantis and Dani DeSantis filed a Bill of Costs on
19 October 5, 2012;

20 WHEREAS Plaintiffs claim, and defendants object to, costs "related to preparing charts,
21 diagrams, videotapes and other visual aids at trial..." (Par. 5c and Exhibit "F": Thinktwice Inc.
22 Invoice) and "videotaped deposition[s]" (Par. 6 and excerpts of Exhibit "G": various invoices
23 detailing videotaped deposition costs);

24 WHEREAS counsel for defendants and plaintiffs have met and conferred pursuant to
25 Local Rule 54-2, and agree to defer litigation of the dispute re costs as follows;

26 Subject to the approval of the court, the parties to the above-entitled action, and by their
27 respective counsel, stipulate that:

- 28 1. Plaintiffs shall file an amended Bill of Costs deleting costs claims "related to preparing

1 charts, diagrams, videotapes and other visual aids at trial..." (Par. 5c and Exhibit "F":
2 Thinktwice Inc. Invoice) and "videotaped deposition[s]" (Par. 6 and excerpts of Exhibit
3 "G": various invoices detailing videotaped deposition costs). The amended Bill of Costs
4 shall be deemed timely filed.

5 2. Plaintiffs reserve, and this Stipulation is without prejudice to, the right to claim costs
6 "related to preparing charts, diagrams, videotapes and other visual aids at trial..." (Par. 5c
7 and Exhibit "F": Thinktwice Inc. Invoice) and "videotaped deposition[s]" (Par. 6 and
8 excerpts of Exhibit "G": various invoices detailing videotaped deposition costs) pursuant
9 to 42 U.S.C. §1988.

10 3. Defendants reserve, and this Stipulation is without prejudice to, the right to object to costs
11 "related to preparing charts, diagrams, videotapes and other visual aids at trial..." (Par. 5c
12 and Exhibit "F": Thinktwice Inc. Invoice) and "videotaped deposition[s]" (Par. 6 and
13 excerpts of Exhibit "G": various invoices detailing videotaped deposition costs) pursuant
14 to 42 U.S.C. §1988.

15
16 Dated: October 12, 2012

/s/

Caroline L. Fowler
City Attorney
Attorney for Defendants
CITY OF SANTA ROSA, Santa Rosa Police Officers
RICH CELLI, TRAVIS MENKE, and PATRICIA
MANN

LAW OFFICES OF AMITAI SCHWARTZ

17
18
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20
21 Dated: October 12, 2012

/s/

Amitai Schwartz
Attorneys for Plaintiff
PATRICIA DESANTIS

ORDER

22 Pursuant to the stipulation of the parties and for good cause shown, **IT IS SO**

23 **ORDERED.**

24
25 Dated: October 15, 2012



HONORABLE JEFFREY S. WHITE
United States District Judge