

JOHN L. BURRIS (State Bar No. 69888)  
 BENJAMIN NISENBAUM (State Bar No. 222173)  
 LAW OFFICES OF JOHN L. BURRIS  
 Airport Corporate Centre  
 7677 Oakport Street, Suite 1120  
 Oakland, California 94621  
 Telephone: (510) 839-5200  
 Facsimile: (510) 839-3882

Attorneys for Plaintiffs

MICHAEL J. HADDAD (State Bar No. 189114)  
 JULIA SHERWIN (State Bar No. 189268)  
 GINA ALTOMARE (State Bar No. 273099)  
 HADDAD & SHERWIN  
 505 Seventeenth Street  
 Oakland, California 94612  
 Telephone: (510) 452-5500  
 Fax: (510) 452-5510

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

JAMES TAYLOR, et. al.,

Plaintiffs,

vs.

CITY OF OAKLAND, et. al.,

Defendants,

**AND ALL RELATED CASES**

SMITH, et. al.,

Plaintiffs,

vs.

CITY OF OAKLAND, et al.,

Defendants.

(Case No. C-07-6298 SI)

) Related Case No. C-04-4843 SI

) Hon. Susan Illston

) **STIPULATION AND**  
 ) **(PROPOSED) ORDER TO**  
 ) **CONTINUE DEADLINE FOR**  
 ) **FILING PLAINTIFFS' MOTION**  
 ) **FOR REASONABLE**  
 ) **ATTORNEYS' FEES AND**  
 ) **EXPENSES in Smith v. City of**  
 ) **Oakland, No. C-07-6298 SI**  
 ) **(Plaintiffs Spencer Troy Lucas and**  
 ) **Kirby Bradshaw) DUE TO**  
 ) **CONTINGENT**  
 ) **SETTLEMENT OF FEE**  
 ) **CLAIM**

1 All parties in the cases tried in Smith v. City of Oakland, No. C-07-6298 SI (Plaintiffs  
2 Spencer Troy Lucas and Kirby Bradshaw v. City of Oakland and Officer Ingo Mayer), by and  
3 through their respective counsel, hereby inform the court that they have agreed to a tentative  
4 settlement of all claims for fees and costs in this particular case, subject to approval by the Oakland  
5 City Council. Currently, the deadline for filing the fee motion is March 1, 2012.  
6

7 To avoid the need to incur unnecessary fees and costs while this tentative settlement is under  
8 consideration by the City Counsel, the parties stipulate, and request this Court to order, that  
9 Plaintiffs' motion for reasonable attorneys' fees and costs may be filed on or before June 1, 2012.  
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11 DATED: February 15, 2012 HADDAD & SHERWIN

12 By: /s/ Michael J. Haddad  
13 Attorneys for Plaintiffs  
14

15 DATED: February 16, 2012 OFFICE OF THE CITY ATTORNEY  
16

17 By: /s/ Randolph Hall  
18 Attorneys for Defendant  
19 City of Oakland

20 DATED: February 16, 2012 BURNHAM BROWN  
21

22 By: /s/ John J. Verber  
23 Attorneys for Defendant  
24 Officer Ingo Mayer  
25  
26  
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**ORDER**

Pursuant to stipulation of the parties and their contingent settlement of Plaintiffs' claims for reasonable attorneys' fees and costs, IT IS SO ORDERED. Plaintiffs' motion for reasonable attorneys' fees and costs may be filed on or before June 1, 2012.

Dated: 2/17, 2012.



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HON. SUSAN ILLSTON  
UNITED STATES DISTRICT COURT