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14 Attorneys for Plaintiff, ALBERT ALATORRE AND ON
15 BEHALF OF ALL OTHERS SIMILARLY SITUATED

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

19 ALBERT ALATORRE, an individual, and on
20 Behalf of all Others Similarly Situated,

21 Plaintiffs,

22 vs.

23 24 HOUR FITNESS USA, INC.,

24 Defendant.

CASE NO. 11 CV 4318 JCS

CLASS ACTION

**STIPULATION TO FILE ATTORNEY
BILLING INVOICES UNDER SEAL**

Date: March 16, 2012
Time: 9:30 a.m.
Crtrm.: G
Judge: Honorable Joseph C. Spero

27 WHEREAS, Local Rules 7-11 and 79-5 require a written stipulation between the parties to
28 support an administrative motion to file any document under seal.

1 WHEREAS, Plaintiff Albert Alatorre intends to file attorney billing records of Wasserman,
2 Comden, Casselman & Esensten, L.L.P. (“WCCE”) and Keller Grover LLP (“KG”) (collectively,
3 “Class Counsel”) in support of his Motion for Attorneys’ Fees and Costs and Incentive Award
4 Payment.

5 WHEREAS, Class Counsel has represented to counsel for Defendant 24 Hour Fitness
6 USA, Inc. (“24 Hour”) that Class Counsel’s attorney billing invoices for this litigation reflect
7 privileged attorney-client communications and/or protected attorney work product.

8 NOW THEREFORE, IT IS HEREBY STIPULATED, pursuant to Local Rules 7-11, 7-12,
9 and 79-5, by and between the parties to this case through their respective attorneys of record that:

10 In support of Plaintiff’s Motion for Attorneys’ Fees and Costs and Incentive Award
11 Payment and subject to Court approval, Plaintiff shall be permitted to file Class Counsel’s attorney
12 billing invoices for this litigation under seal for the Court’s *in camera* review and inspection.

13
14 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

15
16 DATED: January 13, 2012

**WASSERMAN, COMDEN,
CASSELMAN & ESENSTEN, L.L.P.**

17
18 By: /s/-Melissa Meeker Harnett
19 MELISSA MEEKER HARNETT
20 Attorneys for Plaintiff Albert Alatorre and the Class

21 DATED: January 13, 2012

KELLER GROVER L.L.P.

22
23 By: /s/-Jeffrey F. Keller
24 JEFFREY F. KELLER
25 Attorneys for Plaintiff Albert Alatorre and the Class
26
27
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DATED: January 13, 2012

KIRKLAND & ELLIS LLP

By: /s/-Adam W. Holbrook
Elizabeth L. Deeley
Nickolas A. Kacprowski
Adam W. Holbrook
Attorneys for Defendant 24 Hour Fitness USA, Inc.

Dated: Jan. 18, 2012

