

1 Frank Sommers (State Bar No. 109012)  
 2 Andrew Schwartz (State Bar No. 100210)  
 3 SOMMERS & SCHWARTZ LLP  
 4 One Embarcadero Center, Suite 800  
 5 San Francisco, CA 94111  
 6 Telephone: (415) 955-0925  
 7 Facsimile: (415) 955-0927

8 Maura Prendiville (State Bar No. 257514)  
 9 LEGAL AID OF MARIN  
 10 30 N. San Pedro Road, Suite 220  
 11 San Rafael, CA 94903  
 12 Telephone: (415) 492-0230  
 13 Facsimile: (415) 492-0947

14 Attorneys for Plaintiffs Jacquelyn Hall,  
 15 Ariana Martinez, Karla Fernandez,  
 16 Chavon White, and Esther Williams

17 **IN THE UNITED STATES DISTRICT COURT**  
 18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

19 JACQUELYN HALL, ARIANA MARTINEZ,  
 20 KARLA FERNANDEZ, CHAVON WHITE,  
 21 and ESTHER WILLIAMS for themselves and  
 22 all others similarly situated,

23 Plaintiffs,

24 vs.

25 HOUSING AUTHORITY OF THE COUNTY  
 26 OF MARIN, and DOES 1 through 100,  
 27 INCLUSIVE,

28 Defendants.

Case No.: C 12-04922 RS

STIPULATION AND [~~PROPOSED~~] ORDER  
 RE ADMINISTRATIVE MOTION TO SEAL  
 DOCKET NOS. 62, 63, AND 65

Judge: Honorable Richard Seeborg

Date Action Filed: September 20, 2012

Trial Date: Not Yet Rescheduled

1           WHEREAS, Plaintiffs filed their Memorandum of Points and Authorities in Support of the  
2 Preliminary Approval of the Settlement (Docket No. 62), their Memorandum of Points and  
3 Authorities in Support of the Application for an Award of Attorneys' Fees and Costs (Docket No.  
4 63), and Declaration of Frank Sommers in Support of Application for Attorneys' Fees and Costs  
5 (Docket No. 65) on May 1, 2014;

6           WHEREAS, Defendant's Counsel transmitted his letter of May 19, 2014, objecting to  
7 statements in these motion papers, contending that they violated the mediation privilege and the  
8 Settlement Agreement and unduly disparaged Defendant's Counsel, and requesting the replacement  
9 of these papers with statements Defendant's Counsel deemed "offending" to be "removed;"

10           WHEREAS, Plaintiffs' Counsel rejects the contentions in Defendant's Counsel's May 19<sup>th</sup>  
11 letter and believes that its initial papers did not violate the Settlement Agreement or the mediation  
12 privilege and did not unduly disparage Defendant's Counsel. Plaintiffs' Counsel made changes to  
13 many of the sections of the papers that Defendant's Counsel had found "offending" in what it has  
14 now served as its Amended Notice of Motion and Motion For Award of Attorneys' Fees and  
15 Amended Declaration of Frank F. Sommers, and has agreed to seek an order through an  
16 Administrative Motion to Place Docket Nos. 62, 63, and 65 under seal pursuant to Local Rules  
17 Section 7-11; and,

18           WHEREAS, as had been previously agreed between the Court and the parties on the recent  
19 hearing on Plaintiffs' Motion for Preliminary Approval of the Settlement, Plaintiffs' Amended  
20 Notice of Motion and Motion for an Award of Attorneys' Fees and Costs does not identify  
21 insurance carriers of the Housing Authority of the County of Marin.

22 ///

23 ///

24 ///

25

26

27

28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

NOW THEREFORE, Plaintiffs and Defendant stipulate to an order of this Court sealing Docket Nos. 62, 63, and 65, in this matter forthwith. The parties therefore request that the Court approve this Stipulation and authorize the sealing of Docket Nos. 62, 63, and 65 herein.

IT IS SO STIPULATED.

DATED: May 29, 2014

SOMMERS & SCHWARTZ LLP

/s/ Andrew Schwartz  
By: Andrew Schwartz, Attorneys for Plaintiffs  
Jacquelyn Hall, Ariana Martinez, Karla  
Fernandez, Chavon White, and Esther Williams

DATED: May 30, 2014

CHOLAKIAN & ASSOCIATES

/s/ Colin Jewell  
By: Colin Jewell, Attorneys for  
Defendant Housing Authority of the County of  
Marin

IT IS SO ORDERED.

DATED: 6/9/14

  
\_\_\_\_\_  
Honorable Richard Seeborg  
U.S. DISTRICT COURT