

1 KATHLEEN V. FISHER, ESQ. (SBN 70838)
 kfisher@calvofisher.com
 2 RODNEY J. JACOB, ESQ. (SBN 146428)
 rjacob@calvofisher.com
 3 ALEXANDER M. FREEMAN (SBN 237811)
 afreeman@calvofisher.com
 4 CALVO FISHER & JACOB LLP
 5 Attorneys at Law
 6 555 Montgomery Street, Suite 1155
 San Francisco, CA 94111
 7 Telephone: (415) 374-8370
 Facsimile: (415) 374-8373
 8
 9 Attorneys for Shane Claridge Kelley,
 as Trustee of Thomas F. White 1991 Trust,
 10 and Jack Eugene Teeters

11
 12 UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

13 THOMAS F. WHITE 1991 TRUST,
 14
 Plaintiff,
 15
 v.
 16
 17 DAVID WILLIAM CONNELL, et al.,
 18
 Defendants.

Case No. 3:17-cv-03177-WHA

STIPULATION RE: ATTORNEY'S FEES

Hon. William H. Alsup

1 Shane Claridge Kelley, previously known as Shane Claridge White (“Shane”), Trustee of the
2 Thomas F. White 1991 Trust dated July 17, 1991 as amended and restated (the “Trust”), and David
3 Connell, CBPV LLC and ATS LLC (collectively, “Defendants”), through their duly appointed
4 representatives, hereby enter into the following stipulation:

5 Whereas, on August 17, 2017, the Court issued an Order Re Attorney’s Fees and Costs, which
6 awarded the Trust its fees relating to the Trust’s motion to remand granted by the Court on August 17,
7 2017 (Dkt. No. 35);

8 Whereas, on August 31, 2017, pursuant to the Court’s Order Re Attorney’s Fees and Costs, the
9 Trust filed the Declaration of Kathleen V. Fisher Re: Attorney’s Fees (Dkt. No. 39, “Fisher Declaration”);

10 Whereas, on September 14, 2017, Defendants filed the Declaration of William A. Cohan in
11 Opposition to Declaration of Kathleen V. Fisher Re: Attorney’s Fees, objecting to certain entries in the
12 Fisher Declaration (“Fee Objection,” Dkt. No. 42);

13 Whereas, on September 19, 2017, the Court issued its Order Re Fee Objections (Dkt. No. 43),
14 addressing certain objections by defendants; and

15 Whereas, pursuant to the Court’s Order Re Attorney’s Fees and Costs, counsel for the parties met
16 and conferred in person on September 27, 2017 regarding the Defendants’ remaining objections to the
17 fee entries set forth in the Fisher Declaration;

18 IT IS STIPULATED that:

19 In satisfaction of its obligations pursuant to the Court’s Order Re Attorney’s Fees and Costs,
20 Defendants agree to pay \$40,000.00 to Shane Kelley, Trustee of the Thomas F. White 1991 Trust.

21 //

22 //

23 //

24 //

25 //

26 //

27

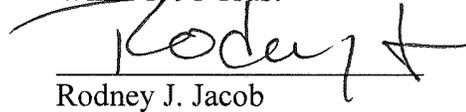
28

1 Dated: September 27, 2017

RESPECTFULLY SUBMITTED,

2 CALVO FISHER & JACOB LLP

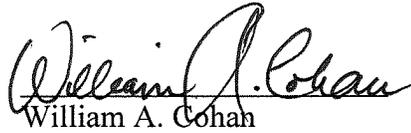
3 Attorneys for Shane C. Kelley, Trustee of Thomas F.
White 1991 Trust

4 

5 Rodney J. Jacob

6
7
8
9 WILLIAM A. COHAN, P.C.

10 Attorneys for David Connell, CBPV LLC and ATS LLC

11 

12 William A. Cohan

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 KATHLEEN V. FISHER, ESQ. (SBN 70838)
kfisher@calvofisher.com
2 RODNEY J. JACOB, ESQ. (SBN 146428)
rjacob@calvofisher.com
3 ALEXANDER M. FREEMAN (SBN 237811)
4 afreeman@calvofisher.com
5 CALVO FISHER & JACOB LLP
6 Attorneys at Law
7 555 Montgomery Street, Suite 1155
8 San Francisco, CA 94111
9 Telephone: (415) 374-8370
10 Facsimile: (415) 374-8373

11 Attorneys for Plaintiffs/Petitioners
12 Shane Claridge Kelley,
13 as Trustee of Thomas F. White 1991 Trust,
14 and Jack Eugene Teeters

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

17 THOMAS F. WHITE 1991 TRUST

18 Plaintiff,

19 v.

20 DAVID WILLIAM CONNELL, et al.,

21 Defendants.

Case No. 3:17-cv-03177-WHA

~~PROPOSED~~ ORDER APPROVING
STIPULATION RE: ATTORNEY'S FEES

Hon. William H. Alsup

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

On August 17, 2017, the Court issued its Order Re Attorney’s Fees and Costs, which awarded the Plaintiff Thomas F. White 1991 Trust dated July 17, 1991 as amended and restated (“Trust”) its fees relating to its motion to remand granted by the Court on August 17, 2017. After the Trust’s counsel submitted a fee declaration, and Defendants’ counsel submitted objections, the Court on September 19, 2017 issued its Order Re Fee Objections (Dkt. No. 43), disposing of certain objections made by Defendants. The parties thereafter met and conferred regarding Defendants’ remaining objections, which led to the Stipulation Re: Attorney’s Fees, filed with the Court on September 27, 2017. Good cause appearing therefor:

IT IS HEREBY ORDERED that the Stipulation Re: Attorney’s Fees is approved.

Dated: September 28, _____, 2017



HON. WILLIAM H. ALSUP
JUDGE OF THE U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA