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Attorneys for Plaintiffs

16 **UNITED STATES DISTRICT COURT**
17 **EASTERN DISTRICT OF CALIFORNIA**
18 **SACRAMENTO DIVISION**

20 LORENZO MAYS, RICKY)
21 RICHARDSON, JENNIFER BOTHUN,)
ARMANI LEE, LEERTESE BEIRGE, and)
22 CODY GARLAND, on behalf of themselves)
and all others similarly situated,)

23)
24 Plaintiffs,)

25 v.)

26 COUNTY OF SACRAMENTO,)

27 Defendant.)
28)

Case No. 2:18-cv-02081 TLN KJN

**STIPULATION FOR REVISED CLASS
NOTICE AND [PROPOSED] ORDER**

JUDGE: Hon. Kendall J. Newman

Complaint Filed: July 31, 2018

1 Plaintiffs Mays, Richardson, Bothun, Lee, Beirge, and Garland, on behalf of the Plaintiff
2 Class, and Defendant County of Sacramento, through their respective counsels of record, enter into
3 this stipulation based on the following facts:

4 1) The parties have reached agreement as to the amount of attorney's fees to be sought in
5 connection with this case. Plaintiffs' counsel is preparing a motion for attorney's fees in which
6 Plaintiffs will ask the Court to grant attorney's fees in the amount of \$2.1 million. Plaintiffs also
7 will seek an annual cap of \$250,000 for monitoring compliance with the Consent Decree in this
8 matter. Defendants have indicated that they will not oppose the motion.

9
10 2) In light of this agreement and the forthcoming motion, the parties seek approval of a
11 revised notice to the class which identifies the precise amount of attorney's fees to be sought and
12 advises class members about how to access a copy of the fees motion, in accordance with Federal
13 Rule of Civil Procedure 23(h).

14
15 ACCORDINGLY, the Parties hereby stipulate as follows:

16 1) The revised Notice, attached hereto as **Exhibit A** (ECF No. 89-1), should be approved in
17 lieu of the Notice approved by the Court on August 13, 2019 (Doc. No. 88), which was attached as
18 Exhibit 2 to the Declaration of Margot Mendelson in Support of the Stipulated Motion for
19 Preliminary Approval of Consent Decree and Notice to the Class (Doc. No. 85). Attached as
20 **Exhibit B** (ECF No. 89-2) is a redlined version of the previous Notice, which identifies the proposed
21 edits for the Court's convenience.

22
23 IT IS SO STIPULATED.

24
25
26 Dated: 9/3/19

Margot Mendelson
Margot Mendelson
PRISON LAW OFFICE
Attorney for Plaintiffs

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Dated: 9/3/19

Aaron J. Fischer (as authorized 9/3/19)
Aaron J. Fischer
DISABILITY RIGHTS CALIFORNIA
Attorney for Plaintiffs

Dated: 9/3/19

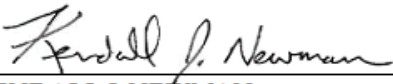
Jessica Valenzuela Santamaria (as authorized 9/3/19)
Jessica Valenzuela Santamaria
COOLEY LLP
Attorney for Plaintiffs

Dated: 9/3/19

Todd Master (as authorized 9/3/19)
Todd Master
HOWARD ROME MARTIN & RIDLEY
Attorney for Defendants

IT IS SO ORDERED.

Dated: September 4, 2019


KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE

/mays2081.ntc2