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20 DENNIS JOSEPH RAIMONDO and
ERIC ANTHONY GARRIS

21 UNITED STATES DISTRICT COURT
22 NORTHERN DISTRICT OF CALIFORNIA
23 SAN FRANCISCO DIVISION
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28 FURTHER STIPULATION RE SETTLEMENT AND DISMISSAL WITH PREJUDICE OF FOIA CLAIMS
WITH THE EXCEPTION OF ATTORNEY'S FEES; PROPOSED ORDER
CASE NO. 13-2295 JSC

1 DENNIS JOSEPH RAIMONDO (a.k.a. JUSTIN
2 RAIMONDO), an individual, AND ERIC
3 ANTHONY GARRIS, an individual,

4 PLAINTIFFS,

5 v.

6 FEDERAL BUREAU OF INVESTIGATION

7 DEFENDANT.

Case No. 13-2295 JSC

**FURTHER STIPULATION RE
SETTLEMENT AND DISMISSAL
WITH PREJUDICE OF FOIA CLAIMS
WITH THE EXCEPTION OF
ATTORNEY'S FEES; ~~PROPOSED~~
ORDER**

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28 FURTHER STIPULATION RE SETTLEMENT AND DISMISSAL WITH PREJUDICE OF FOIA CLAIMS
WITH THE EXCEPTION OF ATTORNEY'S FEES; PROPOSED ORDER

CASE NO. 13-2295 JSC

1 Subject to the approval of the Court, Plaintiffs Dennis Joseph Raimondo and Eric Anthony
2 Garris (“Plaintiffs”) and Defendant Federal Bureau of Investigation (“Defendant”), through their counsel
3 of record, hereby stipulate as follows:

4 1. On January 23, 2017, pursuant to the request and stipulation of the parties, this Court
5 dismissed Plaintiffs’ FOIA claims and ordered that the parties would meet and confer regarding
6 Plaintiffs’ claim for attorney’s fees pursuant to FOIA, and either file a stipulation of settlement and
7 dismissal as to that issue or propose to the Court a briefing schedule with respect to Plaintiffs’ fee
8 petition by February 28, 2017. Dkt. No. 101.

9 2. As previously stipulated, Defendant agrees that Plaintiffs are entitled to an award of
10 reasonable attorney’s fees and costs with respect to their FOIA claims. The parties are endeavoring to
11 reach agreement on the amount of such an award. In light of Plaintiffs’ counsel’s unanticipated absence
12 from the office in the prior weeks, the parties have not been able to engage in a meet and confer as
13 planned.

14 3. Accordingly, and in light of the parties’ expressed mutual interest in resolving this matter
15 between them, they respectfully request additional time to engage in such discussions. The parties
16 hereby propose that they will either file a stipulation of settlement and dismissal as to Plaintiffs’ claim
17 for attorney’s fees pursuant to FOIA or propose a briefing schedule with respect to Plaintiffs’ fee
18 petition to the Court by April 14, 2017. Defendant expressly reserves all arguments regarding the
19 reasonableness of such an award, including any arguments it may have regarding the amount of fees to
20 which Plaintiffs claim they are entitled.

21 SO STIPULATED AND AGREED.

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27 By /s/ Rebecca Falk
28 Rebecca Falk¹
Attorneys for Federal Defendant

¹ I, Rebecca A. Falk, hereby attest, in accordance with the Civil L.R. 5(i)(3), the concurrence in the filing of this document has been obtained from the other signatory listed here.

~~PROPOSED~~ ORDER

Pursuant to the parties' stipulation and good cause having been shown:

1. The parties have represented to the Court they will meet and confer regarding Plaintiffs' claim for attorney's fees regarding their FOIA claims. On or before April 14, 2017, the parties will either file a stipulation of settlement and dismissal as to that issue or propose a briefing schedule with respect to Plaintiffs' fee petition to the Court.

IT IS SO ORDERED.

Dated: February 13, 2017



JACQUELINE SCOTT CORLEY
United States Magistrate Judge