

1 George M. Lee (SBN 172982)
gml@seilerepstein.com
2 **SEILER EPSTEIN LLP**
4 Embarcadero Center, 14th Floor
3 San Francisco, CA 94111
Phone: (415) 979-0500
4 Fax: (415) 979-0511

5 Attorneys for Plaintiffs
6 PAUL MCKINLEY STEWART, KENDALL JONES,
7 FPC ACTION FOUNDATION, FIREARMS POLICY
8 COALITION, SECOND AMENDMENT FOUNDATION,
CALIFORNIA GUN RIGHTS FOUNDATION and MADISON
SOCIETY FOUNDATION

9 **UNITED STATES DISTRICT COURT**

10 **NORTHERN DISTRICT OF CALIFORNIA**

11
12 CHAD LINTON, et al.,

13 Plaintiffs,

14 vs.

15 ROB BONTA, in his official capacity as
16 Attorney General of California, et al.,

17 Defendants.
18

Case No. 3:18-cv-07653-JD

**STIPULATION AND PROPOSED ORDER TO
TAKE FEE MOTION OFF-CALENDAR**

Judge: Hon. James Donato

19 **STIPULATION**

20
21 The parties hereto, Plaintiffs Paul McKinley Stewart et al. (“Plaintiffs”) and Defendants Rob
22 Bonta, in his official capacity as Attorney General of California, and Allison Mendoza, in her
23 official capacity as Director of the California Department of Justice Bureau of Firearms
24 (“Defendants”), hereby agree and STIPULATE as follows:

25 WHEREAS, on August 1, 2024, Plaintiffs Stewart and Jones filed their motion for an award
26 of attorneys’ fees pursuant to Fed. Rule Civ. Pro. 54(d)(2), 42 U.S.C. § 1988(b), and Northern
27 District Civ. L.R. 54-5 (Dkt. No. 84), the hearing of which is scheduled for September 19, 2024 at
28 10:00 a.m. in Courtroom 11;

1 WHEREAS, the parties have stipulated to extend the time for Defendants to file their
2 opposition to the Plaintiffs' Fee Motion (Dkt. Nos. 86, 88), which was granted on August 28, 2024
3 (Dkt. No. 89); and

4 WHEREAS, the parties have now entered into a tentative settlement related to the payment
5 of Plaintiffs' costs and fees:

6 NOW, THEREFORE, THE PARTIES STIPULATE AND AGREE, that the current Motion
7 for Attorneys' Fees and Costs, presently set for hearing on September 19, 2024, should go off-
8 calendar, without prejudice to its renewal, until the parties can finalize their settlement, and file a
9 stipulation for dismissal pursuant to FRCP 41.

10 The parties jointly request that the Court approve this stipulation by endorsing the proposed
11 order below.

12 STIPULATED BY:

13 Dated: September 3, 2024

SEILER EPSTEIN LLP

/s/ George M. Lee

George M. Lee

Attorney for Plaintiffs

17 Dated: September 3, 2024

ROB BONTA

Attorney General of California

/s/ Anthony R. Hakl

ANTHONY R. HAKL

Supervising Deputy Attorney General

Attorneys for Defendants

23 **ORDER**

24 The foregoing stipulation of the parties is approved, and it is hereby ORDERED:

25 Plaintiffs' Motion for Attorneys' Fees and Costs, presently set for hearing on September 19,
26 2024 before this Court, shall go off-calendar, without prejudice to its being renewed, until such time
27 as the parties may finalize their settlement and file their stipulation to a dismissal of this matter
28 pursuant to FRCP 41.

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SO ORDERED.

Dated: _____

HON. JAMES DONATO
UNITED STATES DISTRICT JUDGE