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 6 *Paul McKinley Stewart, Kendall Jones,*
 7 *FPC Action Foundation, Firearms Policy Coalition,*
 8 *Second Amendment Foundation, California Gun*
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 Attorney General of California
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 16 *Attorneys for Defendants Rob Bonta, in his official capacity*
 17 *as California Attorney General, Allison Mendoza, in her*
 18 *official capacity as Director of the California Department*
 19 *of Justice Bureau of Firearms, and Robert D. Wilson, in his*
official capacity as Deputy Attorney General

UNITED STATES DISTRICT COURT

DISTRICT OF NORTHERN CALIFORNIA

22 CHAD LINTON, et al.,

23 Plaintiffs,

24 vs.

26 ROB BONTA, in his official capacity as
 27 Attorney General of California, et al.,

28 Defendants.

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

**STIPULATED JUDGMENT ON PLAINTIFFS’
 MOTION FOR ATTORNEYS’ FEES AND
 COSTS**

[FRCP 54(d)]

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

5
6 RECITALS

7 WHEREAS, on June 17, 2024, the Court entered a Permanent Injunction (Dkt. 80) and
8 Judgment (Dkt. 81) in favor of plaintiffs Paul McKinley Stewart and Kendall Jones;

9 WHEREAS, on August 1, 2024, Plaintiffs Stewart and Jones filed their motion for an
10 award of attorneys’ fees pursuant to Fed. Rule Civ. Pro. 54(d)(2), 42 U.S.C. § 1988(b), and
11 Northern District Civ. L.R. 54-5 (Dkt. No. 84) (“Fee Motion”), the hearing of which was
12 originally scheduled for September 19, 2024;

13 WHEREAS, on August 1, 2024, Plaintiffs also filed and served their Bill of Costs (Dkt.
14 85);

15 WHEREAS, the parties thereafter stipulated to extend the time for Defendants to file
16 their opposition to the Plaintiffs’ Fee Motion (Dkt. Nos. 86, 88), which was granted on August
17 28, 2024 (Dkt. No. 89);

18 WHEREAS, on September 4, 2024, the parties filed their further Stipulation to take
19 Plaintiffs’ Fee Motion off calendar, and advised the court that the parties entered into a tentative
20 settlement related to the payment of Plaintiffs’ costs and fees (Dkt. 91);

21 WHEREAS, on September 4, 2024, the Court approved of the parties’ stipulation and
22 ordered the Plaintiffs’ Fee Motion to go off calendar, without prejudice to its being renewed;

23 WHEREAS, the parties have agreed that the value of Plaintiffs’ legal fees and costs is
24 \$244,399.76; and

25 WHEREAS, the parties desire to end further motion practice, further controversy and
26 fees, and to give Defendants the opportunity to obtain the approvals and satisfy the
27 requirements set forth in Cal. Government Code § 965, et seq.:

28

STIPULATION FOR ENTRY OF JUDGMENT

In light of the foregoing recitals, the parties hereby stipulate that the Court should enter an order and judgment within the meaning of Fed. Rule Civ. Proc. 54, awarding fees and costs in favor of Plaintiffs Paul McKinley Stewart and Kendall Jones, and against Defendants Rob Bonta, in his official capacity as Attorney General of California, and Allison Mendoza, in her official capacity as Director of the California Department of Justice Bureau of Firearms, in the amount of **\$244,399.76**, which stipulated sum represents the reasonable and agreed-upon amount of attorneys’ fees and costs awardable to Plaintiffs pursuant to 42 U.S.C. § 1988(b) and Fed. Rule Civ. Pro. 54(d).

Plaintiffs authorize Defendants to make payment directly to “Seiler Epstein LLP Client Trust Account.”

The Court shall retain jurisdiction to enforce this judgment.

Dated: November 22, 2024

SEILER EPSTEIN LLP

/s/ George M. Lee
George M. Lee

Attorneys for Plaintiffs Chad Linton,
Paul McKinley Stewart, Kendall Jones, FPC
Action Foundation, Firearms Policy Coalition,
Second Amendment Foundation, California Gun
Rights Foundation, and Madison Society
Foundation

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1 Dated: November 22, 2024

ROB BONTA
Attorney General of California
ANTHONY R. HAKL
Supervising Deputy Attorney General

2
3
4 /s/ Jerry T. Yen
5 JERRY T. YEN
6 Deputy Attorney General

7 Attorneys for Defendants Rob Bonta, in his
8 official capacity as California Attorney General,
9 Allison Mendoza, in her official capacity as
10 Director of the California Department of Justice
11 Bureau of Firearms and Robert D. Wilson, in his
12 official capacity as Deputy Attorney General

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ORDER

The Court accepts the foregoing stipulation of the parties, and hereby orders that attorneys' fees and costs shall be awarded to Plaintiffs Paul McKinley Stewart and Kendall Jones in accordance with the above stipulation.

SO ORDERED.

Dated: _____

HON. JAMES DONATO
UNITED STATES DISTRICT JUDGE

SEILER EPSTEIN LLP