

1 KAMALA D. HARRIS  
 Attorney General of California  
 2 JONATHAN L. WOLFF  
 Senior Assistant Attorney General  
 3 DEBBIE VOROUS  
 WILLIAM KWONG  
 4 KYLE A. LEWIS  
 DANIELLE F. O'BANNON  
 5 Deputy Attorney General  
 State Bar No. 207095  
 6 455 Golden Gate Avenue, Suite 11000  
 San Francisco, CA 94102-7004  
 7 Telephone: (415) 703-5735  
 Fax: (415) 703-5843  
 8 E-mail: Danielle.OBannon@doj.ca.gov  
*Attorneys for Defendants*

HANSON BRIDGET LLP  
 PAUL B. MELLO  
 JERROLD C. SCHAEFER  
 WALTER R. SCHNEIDER  
 MEGAN C. OLIVER THOMPSON  
 SAMANTHA D. WOLFF  
 RENJU P. JACOB  
 PAUL B. GRUWELL  
 425 Market Street, 26th Floor  
 San Francisco, CA 84105  
 Telephone: (415) 777-3200  
 Fax: (415) 541-9366  
 E-mail: pmello@hansonbridget.com

10 IN THE UNITED STATES DISTRICT COURT  
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 12 AND THE EASTERN DISTRICT OF CALIFORNIA  
 13 UNITED STATES DISTRICT COURT COMPOSED OF THREE JUDGES  
 14 PURSUANT TO SECTION 2284, TITLE 28 UNITED STATES CODE

16 RALPH COLEMAN, et al.,  
 Plaintiffs,  
 17 v.  
 18 EDMUND G. BROWN, JR, et al.,  
 19 Defendants.

CASE NO. 2:90-CV-00520 LKK JFM P  
**THREE-JUDGE COURT**

20 MARCIANO PLATA, et al.,  
 Plaintiffs,  
 21 v.  
 22 EDMUND G. BROWN, JR et al.,  
 23 Defendants.

CASE NO. C01-1351 TEH  
**STIPULATION AND [PROPOSED]  
 ORDER REGARDING ATTORNEYS'  
 FEES, EXPENSES, AND COSTS**

25 All matters concerning attorneys' fees, expenses, and costs arising out of the three-judge  
 26 court litigation were stayed pending the U.S. Supreme Court's decision. (*See Plata* Docket 2321,  
 27 2344; *Coleman* Docket 3948, 2977.) On May 23, 2011, the U.S. Supreme Court issued its  
 28

1 decision affirming the three-judge court's order. Defendants and the Prison Law Office submit  
2 this stipulation concerning the Prison Law Office's attorneys' fees, expenses, and costs arising  
3 out of the three-judge court litigation through June 30, 2011.

4 Plaintiffs are represented by multiple law firms in this litigation. One law firm is the Prison  
5 Law Office. Defendants and the Prison Law Office completed their meet and confer process on  
6 October 4, 2011, and have successfully narrowed the dispute and reached a resolution in the  
7 amount of \$2,184,759, for all fees, costs, and expenses related to, incurred by, and associated  
8 with the Prison Law Office's attorneys' fees, expenses, and costs for the three-judge court  
9 proceedings, including all work before the district court, the three-judge court, the Ninth Circuit  
10 Court of Appeals, and the U.S. Supreme Court, incurred through June 30, 2011.

11 The parties agree that Defendants will not pay any multiplier and the Prison Law Office  
12 agrees to discount its demand for attorneys' fees, expenses, and costs as set forth above. The  
13 Prison Law Office waives any and all rights associated with any further payment of fees,  
14 expenses, costs, or compensation of any kind associated with the three-judge court proceedings  
15 through June 30, 2011. Defendants will pay \$2,184,759 within 14 days of the date of execution  
16 of this stipulation.

17 IT IS SO STIPULATED:

18 DATED: October 5, 2011

HANSON BRIDGET LLP

19  
20 //s// Paul B. Mello

PAUL B. MELLO

Attorneys for Defendants

22 ATTORNEY GENERAL'S OFFICE

23  
24 //s// Danielle F. O'Bannon

DANIELLE F. O'BANNON

Deputy Attorney General

Attorneys for Defendants

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DATED: October 5, 2011

PRISON LAW OFFICE

//s// Donald Specter  
DONALD SPECTER  
Attorneys for Plaintiffs

IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2011

\_\_\_\_\_  
HON. THELTON E. HENDERSON  
U.S. District Court Judge

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**CERTIFICATE OF SERVICE**

Case Name: **Schwarzenegger v. Plata & Coleman, et al.** No. **09-1233**  
**Case No. 09-1233**

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I hereby certify that on **October 5, 2011**, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**STIPULATION AND [PROPOSED] ORDER REGARDING ATTORNEYS' FEES, EXPENSES, AND COSTS**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on **October 5, 2011**, at San Francisco, California.

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D. Criswell  
Declarant

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*s/ D. Criswell*  
Signature