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25 Attorneys for Defendants

26 MAUREEN D'AMICO, JOHN EVANS,

27 MICHAEL JOHNSON,

ROBERT MCMILLAN

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

3  
4 JAMAL RASHID TRULOVE,  
5 Plaintiff,  
6 vs.  
7 MAUREEN D'AMICO, MICHAEL  
8 JOHNSON, ET AL.,  
9 Defendants.

Case No. 16-cv-00050-YGR  
**JOINT STIPULATION ON  
ATTORNEYS' FEES AND COSTS**

10 The parties have met and conferred, and seek to resolve the issues of attorneys' fees and  
11 costs without further litigation and on reasonable and fair terms, and hereby enter into the  
12 following Joint Stipulation of Attorneys' Fees and Costs:  
13

14 The parties agree that Plaintiff is a prevailing party as to the claims brought against  
15 Defendants Maureen D'Amico and Michael Johnson and is entitled to fees and costs against  
16 them under 42 U.S.C. § 1988 based on the judgment entered on verdict. [ECF 550]. The parties  
17 stipulate that Defendants Maureen D'Amico and Michael Johnson shall pay \$4,500,000.00 (Four  
18 Million Five Hundred Thousand) to Plaintiff, in addition to interest as provided by 28 U.S.C.  
19 § 1961. This amount will satisfy Plaintiff's claims for attorneys' fees and costs through April 6,  
20 2018, the last date of trial. Defendants assert and plaintiff disputes that the defendants who  
21 obtained judgment in their favor or a dismissal are entitled to costs, but as part of this agreement  
22 all defendants will withdraw their Bill of Costs filed and not seek costs based on the dismissals  
23 or the judgment entered. [ECF 568]. Defendants agree that they will not challenge the  
24 reasonableness of the attorneys' fees and costs based on the judgment entered. However, the  
25 parties agree that other post-trial motions or an appeal may alter the parties' entitlement to fees  
26  
27  
28

1 and costs, and therefore if after the post trial motions or possible appeal either party believes that  
2 any court ruling has an effect on entitlement to pre-judgment fees or costs, either party may seek  
3 to reopen the issues addressed in this agreement.

4 The parties therefore seek an order from the Court entering judgment of \$4,500,000.00 in  
5 attorneys' fees and costs in Plaintiff's favor, plus interest on attorneys' fees and costs to accrue  
6 as of the date of judgment, to supplement the Court's Judgment on Verdict. [ECF 550]. The  
7 parties stipulate that Plaintiff need not file a separate application for costs or attorneys' fees.  
8

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10  
11  
12 Respectfully submitted,

13 DATED: May 11, 2018

NEUFELD SCHECK & BRUSTIN, LLP

14 By: /s/Anna Benvenuti Hoffmann

15 Anna Benvenuti Hoffmann, NY Bar No. 4412011

16 (pro hac vice)

*One of Plaintiff Jamal Trulove's Attorneys*

17 DATED:

SAN FRANCISCO CITY ATTORNEY'S OFFICE

18 By: \_\_\_\_\_

19 Margaret W. Baumgartner, Deputy City Attorney

20 State Bar #151762

21 Attorney for Defendants  
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