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11 Attorneys for Tucson Unified School District No. One, et al.

12 **IN THE UNITED STATES DISTRICT COURT**  
13 **FOR THE DISTRICT OF ARIZONA**

14 Roy and Josie Fisher, et al.,  
15 Plaintiffs  
v.  
16 United States of America,  
17 Plaintiff-Intervenor,  
18 v.  
19 Anita Lohr, et al.,  
20 Defendants,  
21 Sidney L. Sutton, et al.,  
Defendants-Intervenors,

CV 74-90 TUC DCB  
(Lead Case)

**STIPULATED MOTION FOR  
APPROVAL OF FEE  
AGREEMENT BETWEEN  
MENDOZA PLAINTIFFS AND  
TUSD**

**MOTION FOR ACTION**

22 Maria Mendoza, et al.  
23 Plaintiffs,  
24 United States of America,  
25 Plaintiff-Intervenor,  
v.  
26 Tucson Unified School District No. One, et al.  
27 Defendants.

CV 74-204 TUC DCB  
(Consolidated Case)

1 Pursuant to The Mendoza Fee Agreement (ECF 1697-1) adopted by the Court in its  
2 November 4, 2014 Order (ECF 1711), Tucson Unified School District No. One (“TUSD”)  
3 and the Mendoza Plaintiffs (collectively “the Parties”) hereby request the Court’s approval  
4 of the Parties’ resolution of the Mendoza Plaintiffs’ Fee and Cost Requests for the period of  
5 July 1, 2015 through September 30, 2015 in the total amount of \$52,553.09.

6 On November 17, 2015 TUSD received the Mendoza Plaintiffs’ request for the  
7 period of July 1, 2015 through September 30, 2015 in the amount of \$58,090.00 in attorney  
8 fees and \$553.09 in costs (attached hereto as **Exhibit A**). The Parties have agreed to  
9 resolve this request in the amount of \$52,553.09 inclusive of fees and costs. The parties  
10 further agree TUSD will submit payment directly to counsel for the Mendoza Plaintiffs  
11 within 30 days after the Court enters its order approving this stipulated motion. Should the  
12 Court disapprove this stipulated motion, the parties shall present briefing to Magistrate  
13 Judge McDonald for review and decision in accordance with the Mendoza Fee Agreement.  
14 See 1697-1 at 5.

15 Respectfully submitted this <sup>rd</sup> day of December, 2015

16 **PROSKAUER ROSE LLP**

17  
18 /s/ Lois D. Thompson  
19 Lois D. Thompson  
20 Jennifer L. Roche  
21 Attorneys for Mendoza Plaintiffs

22 **MALDEF**

23 /s/ Juan Rodriguez  
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25 Attorneys for Mendoza Plaintiffs

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27 s/ J. William Brammer, Jr.  
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4 **ORIGINAL** of the foregoing filed via the CM/ECF  
5 Electronic Notification System and transmittal of a  
6 Notice of Electronic Filing provided to all parties  
7 that have filed a notice of appearance in the District  
8 Court Case, as listed below.

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14 s/ Jason Linaman \_\_\_\_\_