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

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF ARIZONA**

Roy and Josie Fisher, et al.,

Plaintiffs

CV 74-90 TUC DCB  
(Lead Case)

v.

United States of America,

Plaintiff-Intervenor,

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

v.

Anita Lohr, et al.,

Defendants,

**MOTION FOR ACTION**

CV 74-204 TUC DCB  
(Consolidated Case)

and

Sidney L. Sutton, et al.,

Defendants-Intervenors,

Maria Mendoza, et al.

Plaintiffs,

United States of America,

Plaintiff-Intervenor,

v.

Tucson Unified School District No. One, et al.

Defendants.

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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 Mendoza Plaintiffs’ Fee and Cost Requests for the periods of  
5 March 1, 2013 through September 31, 2014 and October 1, 2014 through December 31,  
6 2014 for the total amount of \$394,567.61.

7 On December 5, 2014 TUSD received the Mendoza request for the period of March  
8 1, 2013 through October 31, 2014 in the amount of \$421,627.50 in fees and \$3,797.79 in  
9 costs (attached hereto as **Exhibit A**). On February 6, 2015 TUSD received the Mendoza  
10 request for the period of October 1, 2014 through December 31, 2014 in the amount of  
11 \$59,927.50 in fees and \$769.82 in costs (attached hereto as **Exhibit B**).

12 The Parties have agreed to resolve these two requests jointly in the amount of  
13 \$390,000 for Fees and \$4,567.61 for Costs for a total settlement of \$394,567.61. The  
14 parties further agree TUSD will submit payment directly to counsel for Mendozas within 30  
15 days after the Court enters its order approving this stipulated motion. Should the Court  
16 disapprove this stipulated motion, the parties shall present briefing to Magistrate Judge  
17 McDonald for review and decision in accordance with the Mendoza Fee Agreement. *See*  
18 1697-1 at 5.

19  
20 Respectfully submitted this 24th day of March, 2015

21  
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**ORIGINAL** of the foregoing filed via the CM/ECF Electronic Notification System and transmittal of a Notice of Electronic Filing provided to all parties that have filed a notice of appearance in the District Court Case, as listed below.

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20 **COPY** of the foregoing served via email  
21 this 24th day of March, 2015 to:

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s/ Jason Linaman