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25 **IN THE UNITED STATES DISTRICT COURT**

26 **FOR THE DISTRICT OF ARIZONA**

27 Roy and Josie Fisher, et al.,

28 Plaintiffs

CV 74-90 TUC DCB
(Lead Case)

v.

United States of America,

Plaintiff-Intervenor,

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

v.

Anita Lohr, et al.,

Defendants,

CV 74-204 TUC DCB
(Consolidated Case)

and

Sidney L. Sutton, et al.,

Defendants-Intervenors,

1 Maria Mendoza, et al.
2
3 Plaintiffs,
4 United States of America,
5
6 Plaintiff-Intervenor,
7
8 v.
9 Tucson Unified School District No. One, et al.
10
11 Defendants.
12

13 Pursuant to The Fisher Fee Agreement (ECF 1717) adopted by the Court in its
14 December 1, 2014 Order (ECF 1722), and later amended by the Court in its December 5,
15 2014 Order (ECF 1725), Tucson Unified School District No. One (“TUSD”) and the Fisher
16 Plaintiffs (collectively “the Parties”) hereby request the Court’s approval of the Parties’
17 resolution of Fisher Plaintiffs’ Fee Requests for the periods of April 3, 2013 through
18 December 31, 2014 and January 2, 2014 through December 31, 2014 for the total amount of
19 \$393,750.00.

20 On February 3, 2015, TUSD received the Fisher request for the period of April 3,
21 2013 through December 31, 2013 in the amount of \$246,260.00 in fees and no costs. On
22 April 30, 2015, TUSD received the Fisher request for the period of January 2, 2014 through
23 December 31, 2014 in the amount of \$283,640.00 and no costs.

24 Pursuant to the Parties’ stipulated agreement, TUSD notified Fisher Counsel
25 promptly of those matters with which it disagreed, and the Parties worked together to
26 address the issues raised by TUSD. The Parties have agreed to resolve both requests jointly
27 for a total settlement of \$393,750.00. The parties further agree TUSD will submit payment
28 directly to counsel for Fishers within 30 days after the Court enters its order approving this
stipulated motion. Should the Court disapprove this stipulated motion, the parties shall
present briefing to Magistrate Judge McDonald for review and decision in accordance with
the Fisher Fee Agreement. See 1717 at 9.

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1 Respectfully submitted this 10th day of June, 2015
2

3 s/ Rubin Salter, Jr.
4 Rubin Salter, Jr.
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6 Attorneys for Fisher Plaintiffs

7
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16
17 **ORIGINAL** of the foregoing filed via the CM/ECF
18 Electronic Notification System and transmittal of a
19 Notice of Electronic Filing provided to all parties
20 that have filed a notice of appearance in the District
21 Court Case, as listed below.

22
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