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13 **IN THE UNITED STATES DISTRICT COURT**

14 **FOR THE DISTRICT OF ARIZONA**

15 Roy and Josie Fisher, et al.,

16 Plaintiffs

CV 74-90 TUC DCB
(Lead Case)

17 v.

18 United States of America,

19 Plaintiff-Intervenor,

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

20 v.

21 Anita Lohr, et al.,

22 Defendants,

MOTION FOR ACTION

23 and

24 Sidney L. Sutton, et al.,

25 Defendants-Intervenors,

CV 74-204 TUC DCB
(Consolidated Case)

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1 Maria Mendoza, et al.
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3 United States of America,
4 Plaintiff-Intervenor,
5 v.
6 Tucson Unified School District No. One, et al.
7 Defendants.

8 Pursuant to The Mendoza Fee Agreement (ECF 1697-1) adopted by the Court in its
9 November 4, 2014 Order (ECF 1711), Tucson Unified School District No. One (“TUSD”)
10 and the Mendoza Plaintiffs (collectively “the Parties”) hereby request the Court’s approval
11 of the Parties’ resolution of Mendoza Plaintiffs’ Fee and Cost Requests for the period of
12 April 1, 2015 through June 30, 2015 in the total amount of \$60,000.00.

13 On August 10, 2015 TUSD received the Mendoza request for the period of April 1,
14 2015 through June 30, 2015 in the amount of \$72,615.00 in fees (attached hereto as **Exhibit**
15 **A**). The Parties have agreed to resolve this request in the amount of \$60,000. The parties
16 further agree TUSD will submit payment directly to counsel for Mendozas within 30 days
17 after the Court enters its order approving this stipulated motion. Should the Court
18 disapprove this stipulated motion, the parties shall present briefing to Magistrate Judge
19 McDonald for review and decision in accordance with the Mendoza Fee Agreement. *See*
20 1697-1 at 5.

21
22 Respectfully submitted this _____ day of October, 2015

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24 **PROSKAUER ROSE LLP**

25 s/ Lois D. Thompson
26 Lois D. Thompson
27 Jennifer L. Roche
28 Attorneys for Mendoza Plaintiffs

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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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