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CITY OF LOS ANGELES

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

NATIONAL RIFLE ASSOCIATION OF AMERICA; JOHN DOE,

Plaintiffs,

vs.

CITY OF LOS ANGELES; ERIC GARCETTI, in his official capacity as Mayor of the City of Los Angeles; HOLLY L. WOLCOTT, in her official capacity as City Clerk of the City of Los Angeles, and DOES 1-10,

Defendants.

) Case No.: 19-cv-03212-SVW-GJS

)
) **STIPULATION IN LIEU OF OBJECTION**
) **REGARDING PLAINTIFFS’ APPLICATION**
) **TO THE CLERK TO TAX COSTS (ECF No. 51)**

)
) Ctrm: 10A-First Street Courthouse
) Judge: Hon. Stephen V. Wilson

) Action Filed: 04/24/2019

1 Plaintiffs National Rifle Association and John Doe (collectively, Plaintiffs”) and
2 Defendant the City of Los Angeles (“Defendant”) by and through their respective counsel,
3 stipulate as follows:

4 On April 30, 2020, Plaintiffs filed an Application to the Clerk to Tax Costs (the
5 “Application”). (ECF No. 51.)

6 Defendant found certain of the items contained in the Application to be improper
7 under Local Rule 54. Specifically, Defendant objected to the amount sought for the
8 Clerk’s Fee (\$400), the Transcripts of Court Proceedings (\$153), and the Certification,
9 Exemplification and Reproduction of Documents (\$417.55).

10 Accordingly, pursuant to Local Rule 54-2.2, on May 8, 2020, Defendant’s counsel
11 met and conferred with Plaintiffs’ counsel in an effort to resolve disagreement about these
12 specific costs set forth in the Application.

13 Through this meet and confer process, the parties were able to reach an agreement.

14 NOW THEREFORE, the parties hereby stipulate and request as follows:

- 15 1. That Plaintiffs are entitled to \$50 for Clerk’s Fees (L.R. 54-3.1).
- 16 2. That Plaintiffs are entitled to \$103 for Fees for Service of Process (L.R. 54-
17 3.2).
- 18 3. That Plaintiffs are entitled to \$91.65 for Certification, Exemplification and
19 Reproduction of Documents (L.R. 54-3.10).
- 20 4. That Plaintiffs’ costs should thus be taxed in the total amount of \$244.65 (the
21 sum of \$50 + \$103 + \$91.65).
- 22 5. That Plaintiffs withdraw their request for any other costs set forth in the
23 Application.
- 24 6. That nothing in this stipulation is intended or shall be construed to serve as a
25 withdrawal of Plaintiffs’ pending Motion for Attorneys’ Fees, filed on April
26 30, 2020.

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28 **IT IS SO STIPULATED.**

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Dated: May 12, 2020

MICHEL & ASSOCIATES, P.C.

By:

/s/ Anna M. Barvir

Anna M. Barvir

Attorneys for Plaintiffs
NATIONAL RIFLE ASSOCIATION and
JOHN DOE

Dated: May 12, 2020

OFFICE OF THE CITY ATTORNEY OF
LOS ANGELES

By:

/s/ Benjamin Chapman

Benjamin Chapman

Attorneys for Defendant
CITY OF LOS ANGELES

Pursuant to Local Rule 5-4.3.4(a)(2)(i), all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.