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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	Anna M. Barvir – SBN 268728 Sean A. Brady – SBN 262007 Tiffany D. Cheuvront – SBN 317144 MICHEL & ASSOCIATES, P.C. 180 East Ocean Blvd., Suite 200 Long Beach, CA 90802 Telephone: 562-216-4444 Facsimile: 562-216-4445 cmichel@michellawyers.com Attorneys for Plaintiffs	MICHAEL N. FEUER, City Attorney (SBN 111529x) KATHLEEN A. KENEALY, Chief Assistant City Attorney (SBN 212289) SCOTT MARCUS, Chief, Civil Litigation Branch (SBN 184980) GABRIEL S. DERMER, Supervising City Attorney (SBN 229424) BENJAMIN CHAPMAN, Deputy City Attorney (SBN 234436) benjamin.chapman@lacity.org 200 North Main St., 6th Floor, City Hall East Los Angeles, California 90012 Telephone Number: 213.978.7556 Facsimile Number: 213.978.8214 Attorneys for Defendant, CITY OF LOS ANGELES	
16	UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION		
17			
18	NATIONAL RIFLE ASSOCIATION O AMERICA; JOHN DOE,	F) Case No.: 19-cv-03212-SVW-GJS	
19 20) STIPULATION IN LIEU OF OBJECTION	
20 21	Plaintiffs, vs.) REGARDING PLAINTIFFS' APPLICATION) TO THE CLERK TO TAX COSTS (ECF NO. 	
22	CITY OF LOS ANGELES; ERIC) 51)	
22	GARCETTI, in his official capacity as) Ctrm: 10A-First Street Courthouse	
	Mayor of the City of Los Angeles;) Judge: Hon. Stephen V. Wilson	
24	HOLLY L. WOLCOTT, in her official		
25	capacity as City Clerk of the City of Los Angeles, and DOES 1-10,) Action Filed: 04/24/2019	
26)	
27	Defendants.		
28		/	
	STIPULATION REGARDING PLAINTIFFS' API	1 PLICATION TO THE CLERK TO TAX COSTS (ECF No. 51)	

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

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

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

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

Through this meet and confer process, the parties were able to reach an agreement. NOW THEREFORE, the parties hereby stipulate and request as follows:

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

IT IS SO STIPULATED.

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2	Dated: May 12, 2020	MICHEL & ASSOCIATES, P.C.	
3		By:	
4		/s/ Anna M. Barvir	
5		Anna M. Barvir	
6		Attorneys for Plaintiffs	
7		NATIONAL RIFLE ASSOCIATION and JOHN DOE	
8			
9	Dated: May 12, 2020	OFFICE OF THE CITY ATTORNEY OF	
10		LOS ANGELES	
11		By:	
12		/s/ Benjamin Chapman	
13		Benjamin Chapman	
14 15		Attorneys for Defendant	
15 16		CITY OF LOS ANGELES	
17			
18	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.		
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20		ing 5 content and have authorized the ming.	
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	STIPULATION REGARDING PLAINTIFFS' APPLICATION TO THE CLERK TO TAX COSTS (ECF NO. 51)		