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Allorneys for De	efendants/Respondents					
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MARK MID L. CALGUNS SH	AM, JAMES BASS, and OOTING SPORTS N, Plaintiffs and Petitioners,	JOINT STII	PULATION PLAI RNEYS'	ON TO NTIFF FEES;		
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STIPULATION

The Parties to this Action, by and through their respective undersigned counsel, hereby stipulate and agree to the following:

WHEREAS, on October 12, 2021, Plaintiffs filed their Notice of Motion and Motion for Attorneys' Fees, with a noticed hearing date of January 14, 2022;

WHEREAS, the Parties have been and are currently engaging in settlement discussions that could potentially result in resolution of all remaining disputes in this matter, which would make any hearing on Plaintiffs' motion for attorneys' fees and/or costs unnecessary;

WHEREAS, the Parties are engaging in such settlement discussions in good faith;

WHEREAS, despite the parties' diligence, Defendant is unable to respond to Plaintiffs' most recent proposal of settlement in advance of the January 3, 2022 deadline to respond to Plaintiffs' motion;

WHEREAS, Defendants have represented to Plaintiffs, and do hereby represent to the Court, that they anticipate being able to provide Plaintiffs with a substantive update to their settlement position by mid-January, 2022;

WHEREAS, if settlement discussions are successful, the Parties anticipate being able to file a Notice of Settlement by March 2022;

WHEREAS, if settlement discussions are not successful, Defendants agree to file their response to Plaintiffs' motion by March 25, 2022;

WHEREAS, absent this continuance, the possibility of settlement will be foreclosed upon prematurely and unnecessarily;

WHEREAS, Defendants have confirmed with the Clerk that April 15, 2022 is the next available hearing date;

THEREFORE, based on the foregoing facts, the Parties hereby stipulate as follows:

- 1. The hearing on Plaintiffs' Motion for Attorneys' Fees is continued from January 14, 2022, to April 15, 2022, at 10:00 a.m., in Department 21;
- 2. If the Parties do not reach a settlement agreement, Defendants will file their response to Plaintiffs' motion by March 25, 2022.

1	SO STIPULATED.	
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. 3	Dated: December 16, 2021	ROB BONTA
4		Attorney General of California ANTHONY R. HAKL
5		Supervising Deputy Attorney General
6		FULL
7		1xime)
8		RYAN A. HANLEY
9		Deputy Attorney General Attorneys for Defendants/Respondents
10	Dated: December 16, 2021	MICHEL & ASSOCIATES, P.C.
11 .	Daica. December 10, 2021	MICHEL & ASSOCIATES, F.C.
12		/s/ Sean A. Brady
13		SEAN A. BRADY
14		Attorneys for Plaintiffs/Petitioners
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DECLARATION OF SERVICE BY U.S. MAIL & E-Mail

Case Name:

Gentry, David, et al. v. Kamala Harris, et al.

No.:

34-2013-80001667

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On <u>December 16, 2021</u>, I served the attached **JOINT STIPULATION TO CONTINUE HEARING ON PLAINTIFFS' MOTION FOR ATTORNEYS' FEES; [PROPOSED] ORDER and [PROPOSED] ORDER RE: CONTINUANCE OF HEARING ON PLAINTIFFS' MOTION FOR ATTORNEYS' FEES** by e-mail and by placing a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550, addressed as follows:

Sean A. Brady
Michel & Associates, P.C.
180 E. Ocean Boulevard, Suite 200
Long Beach, CA 90802
E-mail: sbrady@michellawyers.com

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on December 16, 2021, at Sacramento, California.

Ritta Mashriqi	/s/Ritta Mashriqi
Declarant	Signature

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