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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

ELISA DAHER in her individual capacity and as successor-in-interest to JAIME NARANJO,

Plaintiff,

v.

COUNTY OF SACRAMENTO, SACRAMENTO COUNTY SHERIFF'S OFFICE, DEPUTY SHERIFF ANDREW SEIDEL, SERGEANT DAVID CUNEO, DEPUTY SHERIFF SARA DLUGOPOLSKI, DEPUTY SHERIFF PEDRO AVALOS, DEPUTY SHERIFF CARLOS RODRIGUEZ, DEPUTY SHERIFF MARCELINA MARTINEZ, DEPUTY SHERIFF AIMEE RIVERA, DEPUTY SHERIFF JOE DURAN, DEPUTY SHERIFF WILLIAM ROBINSON, DEPUTY SHERIFF ANDREW GONZALES, DEPUTY SHERIFF CHRISTOPHER PICANCO, DEPUTY SHERIFF JOHN LOPES, SERGEANT LOWERY, DETECTIVE ALEX ZAKRZEWSKI, DETECTIVE BRANDON WRIGHT, DETECTIVE RICHARD S. HAMILTON, DETECTIVE LINDSEY LAMB, SERGEANT CHRIS BRITTON,

Defendants.

Case No. 2:24-cv-02611-DC-SCR

JOINT STIPULATION AND ~~[PROPOSED]~~ ORDER RE: PAYMENT OF ATTORNEYS' FEES AND COSTS UNDER SEPTEMBER 29, 2026 ORDER

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

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JOINT STIPULATION

Plaintiff Elisa Daher, Defendant County of Sacramento (the "County"), and Defendant Sacramento County Sheriff's Office ("SCSO," and with the County, "Defendants") (collectively, "the Parties"), by and through their respective counsel hereby jointly stipulate as follows:

WHEREAS, on September 3, 2026, Plaintiff moved to compel discovery from Defendants, for Sanctions, and for an Order to Show Cause. (*See* Dkt. 76 (the "Motion").) The Parties submitted a Joint Statement pertaining to Plaintiff's Motion on September 10, 2026. (*See* Dkt. 78);

WHEREAS, following the September 24, 2026 hearing on Plaintiff's Motion, the Court advised it was "inclined to grant Plaintiff much of the relief requested in the motion" and directed Plaintiff to "submit a detailed proposed order" the next day, i.e., September 25, 2026. (Minute Order, Dkt. 83);

WHEREAS, on September 25, 2026, Plaintiff submitted the proposed order together with the Declaration of Douglas S. Tilley in support of the same. (*See* Dkt. 85-1.) As relevant to the portion of the proposed order pertaining to Plaintiff's fees incurred, the Tilley Declaration stated that "[w]hile our teams' time reports and invoices are not yet final, I am familiar with the work my co-counsel and our firm have performed in these respects" and "conservatively estimate[d] that Plaintiff's counsel has incurred in excess of $30,000 in fees and costs in performing the work described [in the Tilley Declaration] and otherwise making Plaintiff's motion." (*Id.* ¶ 6);

WHEREAS, on September 29, 2026, the Court entered its Order on the Motion (Dkt. 91) (the "September 29 Order");

WHEREAS, the September 29 Order directed that "Defendants SCSO and the County shall pay Plaintiff's reasonable fees and costs incurred in submitting, briefing, and arguing this Motion," noted that the Tilley Declaration "conservatively estimates the fees incurred to be in excess of $30,000[,]" directed the Parties to "meet and confer as to the amount to be paid," and, "if the Parties agree on an amount, they may file a stipulation and proposed order requiring the payment of that amount." (*Id.* ¶ 6);

WHEREAS, Plaintiff's counsel finalized their time reports and, at Defendants' request, shared the primary timekeeper's time spent and billing rate. Plaintiff reported such fees incurred at

$64,747.15. Defendants contested the reasonableness of the billing rate and the necessity of the work performed. and;

WHEREAS, the Parties have met and conferred regarding the amount to be paid and, to avoid further motion practice, have agreed to the terms set forth below;

IT IS HEREBY STIPULATED THAT:

1. Within thirty (30) days of entry of the Court's order on this Stipulation, Defendants shall pay $30,000 to Plaintiff, through her counsel at BraunHagey & Borden LLP ("BHB"). BHB will provide Defendants documents necessary for the County to issue payment, including banking information for the payment.

2. Plaintiff reserves the right to seek the balance of the fees and costs she incurred in connection with the Motion, together with any additional monetary or other relief available, if she is required to file any further discovery motion concerning the issues addressed in the September 29 Order or Defendants' failure to comply with it. Defendants' payment under paragraph 1 does not waive, release, or otherwise limit Plaintiff's right to seek such relief. Defendants contest the right to seek "the balance of fees and costs she incurred in connection with the Motion" as it is their position that the payment made pursuant to this stipulation satisfies the September 29 Order.

IT IS SO STIPULATED.

Dated: October 16, 2026

BRAUNHAGEY & BORDEN LLP

/s/ Doug Tilley
Doug Tilley
Matthew Borden
Tala Brewster

NATIONAL POLICE ACCOUNTABILITY PROJECT

/s/ Eliana Machefsky
Eliana Machefsky
Lauren Bonds
Keisha James

Respectfully submitted,

PORTER SCOTT
A PROFESSIONAL CORPORATION

/s/ Carl L. Fessenden
Carl L. Fessenden
Cruz Rocha

Attorneys for Defendants

DISABILITY LAW UNITED

/s/ Cynthia L. Rice
Cynthia L. Rice

Attorneys for Plaintiff Elisa Daher in her individual capacity and as successor-in-interest to Jaime Naranjo

[~~PROPOSED~~] ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

1. Within thirty (30) days of entry of the Court's order on this Stipulation, Defendants shall pay $30,000 to Plaintiff, through her counsel at BraunHagey & Borden LLP ("BHB"). BHB will provide Defendants documents necessary for the County to issue payment, including with banking information for the payment.

Dated: October 21, 2026

Honorable Sean C. Riordan
UNITED STATES MAGISTRATE JUDGE