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Attorney for Plaintiff,
Jason W Keller

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

Jason W Keller,

Plaintiff,

v.

COMMISSIONER OF SOCIAL SECURITY,

Defendant

Case 2:25-cv-1744-AC

STIPULATION WITH ~~PROPOSED~~
ORDER FOR: AWARD AND PAYMENT OF
ATTORNEY FEES

IT IS HEREBY STIPULATED by and between the parties, through their undersigned counsel, subject to the approval of the Court, that Plaintiff be awarded attorney fees of TEN THOUSAND DOLLARS and NO CENTS (\$10,000.00) under the Equal Access to Justice Act (EAJA), 28 U.S.C. § 2412(d). This amount represents compensation for all legal services rendered on behalf of Plaintiff by counsel in connection with this civil action, in accordance with 28 U.S.C. § 2412(d).

After the Court issues an order for EAJA fees to Plaintiff, the government will consider the matter of Plaintiff's assignment of EAJA fees to counsel Robert C. Weems (Counsel). Pursuant to *Astrue v. Ratliff*, 560 U.S. 586, 598 (2010), the ability to honor the assignment will depend on whether the fees are subject to any offset allowed under the United States Department of the Treasury's Offset Program. After the order for EAJA fees is entered, the government will determine whether they are subject to any offset.

Fees shall be made payable to Plaintiff, but if the Department of the Treasury determines that Plaintiff does not owe a federal debt, then the government shall cause the payment of fees to be

1 made directly to Counsel, under the assignment executed by Plaintiff. Any payments made shall be
2 delivered to Counsel.

3 This stipulation constitutes a compromise settlement of Plaintiff's request for EAJA attorney
4 fees and is not an admission of liability by Defendant under the EAJA or otherwise. Payment of the
5 agreed amount constitutes a complete release from, and bar to, any and all claims that Plaintiff
6 and/or Counsel, including Counsel's law firm and associates, may have relating to EAJA attorney
7 fees in connection with this action.

8 This award is without prejudice to the rights of Counsel to seek Social Security Act attorney
9 fees under 42 U.S.C. § 406(b), subject to the saving clause provisions of the EAJA.

10 SO STIPULATED AND AGREED, JUNE 5, 2026:

11 ERIC GRANT
12 United States Attorney
13 MATHEW W. PILE, WSBA No. 32245.
14 Head of Program Litigation 1
15 Social Security Administration
16 MARCELO ILLARMO (MABN 670079)
17 Special Assistant United States Attorney
18 Program Litigation 1 | Law & Policy
19 Social Security Administration

20 */s/ Marcelo Illarmo*
21 *(per email authorization)*

22 MARCELO ILLARMO
23 Sp. Asst. U.S. Attorney,
24 Attorney for Defendant

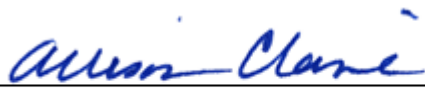
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25 */s/ Robert C. Weems*

26 ROBERT C WEEMS
27 Attorney for Plaintiff
28 Jason W Keller

SO ORDERED:

Date: June 9, 2026


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE