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JML LAW

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA OF CALIFORNIA

SERGIO PEREZ, an individual;
Plaintiff,

vs.

ALLSCRIPTS HEALTHCARE,
LLC, a North Carolina Limited
Liability Company; and DOES 1
through 50, inclusive;
Defendants.

Case No. 16-CV-06396-AB-E
*(Assigned for all purposes to the Hon.
Andre Birotte, Jr.)*

**[PROPOSED] ORDER OF
PREJUDICIAL DISMISSAL OF
ENTIRE LAWSUIT**

Complaint Filed: July 13, 2016

It is hereby ordered by United States District Judge André Birotte Jr. as follows:

1. The stipulation of the parties is hereby accepted and adopted as the order of the court;

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2. All named and fictitious defendants are hereby dismissed with prejudice to re-filing in this or any other federal or state court under all pled and unpled causes of action;
3. The Plaintiff, SERGIO PEREZ, is permanently waiving all past, present and future: special damages, general damages; punitive damages; equitable relief, attorneys' fees, whether of record or not; ordinary and extraordinary costs, whether incurred or paid; discovery rights; and,
4. As a result of the parties' full and final resolution of all aspects of this litigation in this or any other federal or state court, as to all pled and unpled causes of action in favor of all named or unnamed parties, all pending litigation events and deadlines, including the pretrial conference and trial, are unnecessary and are forthwith vacated by this order.

IT IS SO ORDERED.

DATED: April 4, 2017



HONORABLE ANDRÉ BIROTTE JR.

PROOF OF SERVICE
1013a (3) CCP Revised 5/1/88

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF
CALIFORNIA

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is, 21052 Oxnard Street, Woodland Hills, CA.91367

On February 15, 2017, I served the foregoing document described as **[PROPOSED] ORDER OF PREJUDICIAL DISMISSAL OF ENTIRE LAWSUIT**, on the interested parties in this action by placing the original true copies thereof enclosed in a sealed envelope, addressed as follows:

JUDY M. IRIYE
JAMIE CHU
LITTLER MENDELSON, P.C.
2049 Century Park East
5th Floor
Los Angeles, CA 90067-3107

By mail, I deposited such envelope(s) in the mail at Woodland Hills, California, with postage thereon fully prepaid.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Woodland Hills, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

By facsimile, I transmitted such documents from Woodland Hills, California, to the offices of the addressee(s).

By personal service, I delivered such envelope(s) by hand to the office(s) of the addressee(s).

(State) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

(Federal) I declare that I am employed in the office of a member of the Bar of this Court, at whose direction the service was made.

Executed on February 15, 2017 at Woodland Hills, California.

TAD KUCHAR