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11 Attorneys for Defendant, BANK OF AMERICA, N.A. (Erroneously sued as Bank of
 America Corporation)
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 14 **UNITED STATES DISTRICT COURT**
 15 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
 16 **LOS ANGELES DIVISION**

17	NOUSHIN LAALY, an individual, and)	CASE NUMBER:
18	KOUROSH LAALY, an individual,)	2:16-CV-09369-CAS (PJWx)
)	
	Plaintiffs,)	
)	
20	vs.)	STIPULATION FOR DISMISSAL AND
)	[PROPOSED] ORDER
21	BANK OF AMERICA CORPORATION, a)	
	corporation; BANK OF AMERICA,)	
22	NATIONAL ASSOCIATION, a National)	
	Banking Association; and DOES 1 to 100,)	
23	inclusive;)	
)	
24	Defendants.)	Honorable Christine S. Snyder
)	

1 WHEREAS on November 2, 2016, Plaintiffs, NOUSHIN LAALY and KOUROSH
2 LAALY (collectively, “Plaintiffs”) filed a Complaint in the Superior Court of California, County
3 of Los Angeles, Case Number BC639397, against Defendants BANK OF AMERICA,
4 NATIONAL ASSOCIATION, a National Banking Association, and BANK OF AMERICA
5 CORPORATION, a corporation (collectively, “Defendants”), for Breach of Contract,
6 Conversion, Negligence, Gross Negligence, and Negligent Infliction of Emotional Distress. On
7 December 19, 2017, the Complaint was removed from the California Superior Court to this
8 Court.

9 WHEREAS, Plaintiffs and Defendants have amicably settled this matter.

10 THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiffs and Defendants,
11 through their counsel, to dismiss the entire above-captioned action with prejudice, pursuant to the
12 Federal Rules of Civil Procedure Rule 41(a)(1)(A)(ii). The parties further stipulate that each
13 party shall bear its own costs and expenses, including attorney fees.

14 IT IS SO STIPULATED.

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16 Date: September 12, 2017

LAW OFFICE OF STELLA RAFIEI

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/s/ Stella Rafiei
STELLA RAFIEI, Attorney for PLAINTIFFS,
Noushin Laaly and Kourosh Laaly

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21 Date: August 28, 2017

SEVERSON & WERSON

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/s/ Erin S. Kubota
ERIN S. KUBOTA, Attorney for DEFENDANTS,
Bank of America, N.A.

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The Court having considered the stipulation of the parties, and good cause appearing therefore, orders as follows:

1. The entire action is dismissed with prejudice pursuant to Federal Rules of Civil Procedure Rule 41(a)(1)(A)(ii).
2. Each party shall bear its own costs and expenses, including attorney fees.

IT IS SO ORDERED.

Date: September 19, 2017



Honorable Christina A. Snyder