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5 Attorneys for Plaintiff  
6 GOLDEN MEMORIAL  
INSURANCE SERVICES, INC.

7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10  
11 GOLDEN MEMORIAL INSURANCE ) Case No: 1:11-cv-01058-LJO-BAM  
SERVICES, INC., a California corporation, )  
12 ) **STIPULATION OF DISMISSAL**  
Plaintiff, ) **WITH PREJUDICE OF**  
13 vs. ) **DEFENDANT GUADALUPE “JOE”**  
 ) **GONZALEZ**  
14 SECURED SERENITY, INC., a California )  
corporation, GOLDEN MEMORIAL )  
15 COMPANIES, INC., a California corporation, )  
16 GOLDEN MEMORIAL PLAN, INC., a )  
California corporation, LAURO HERRERA, an )  
17 Individual, ROBERT PAUL “BO” CLARK, JR., )  
an Individual, GUADALUPE “JOE” )  
18 GONZALEZ, an Individual AND DOES 1-10 )  
19 INCLUSIVE, )  
 )  
20 Defendants. )

21 Pursuant to Local Rule 41(a)(1) of the Federal Rules of Civil Procedure, Plaintiff  
22 GOLDEN MEMORIAL INSURANCE SERVICES, INC., a California corporation (“Plaintiff”),  
23 and Defendants SECURED SERENITY, INC., a California corporation, GOLDEN  
24 MEMORIAL COMPANIES, INC., a California corporation, GOLDEN MEMORIAL PLAN,  
25 INC., a California corporation, LAURO HERRERA, an Individual, and GUADALUPE “JOE”  
26 GONZALEZ, an Individual, by and through their respective counsel, hereby stipulate to the  
27

28  
STIPULATION OF DISMISSAL WITH PREJUDICE OF DEFENDANT GUADALUPE “JOE” GONZALEZ  
Golden Memorial Insurance Services, Inc. v. Secured Serenity, Inc., et al.

1 dismissal with prejudice of Defendant Guadalupe “Joe” Gonzalez as to all claims and  
2 counterclaims in this action. Each party shall bear its own attorneys’ fees and costs.  
3

4 Dated: December 14, 2012

LARIVIERE, GRUBMAN & PAYNE, LLP

6 By: /s/ Christopher J. Passarelli  
7 Christopher J. Passarelli  
8 Attorneys for Plaintiff

9 Dated: December 14, 2012

TINGLEY PIONTKOWSKI LLP

10 By: /s/ Bruce Piontkowski  
11 Bruce Piontkowski  
12 Attorneys for Defendants

13 **ORDER**

14 Based on the parties’ stipulation, this Court DISMISSES with prejudice this action and  
15 all claims against Defendant Guadalupe “Joe” Gonzalez only. The clerk is directed not to close  
16 this action.

17 IT IS SO ORDERED.

18 Dated: **December 14, 2012**

19 **/s/ Lawrence J. O’Neill**  
20 UNITED STATES DISTRICT JUDGE