

1 **Thomas P. Riley, SBN 194706**  
2 **LAW OFFICES OF THOMAS P. RILEY, P.C.**  
3 **First Library Square**  
4 **1114 Fremont Avenue**  
5 **South Pasadena, CA 91030-3227**

6 **Tel: 626-799-9797**  
7 **Fax: 626-799-9795**  
8 **TPRLAW@att.net**

9 **Attorneys for Plaintiff**  
10 **J & J Sports Productions, Inc.**

11 **UNITED STATES DISTRICT COURT**  
12 **EASTERN DISTRICT OF CALIFORNIA**

13 **J & J SPORTS PRODUCTIONS, INC.,**

14 **CASE NO. 1:11-cv-01564-SAB**

15 **Plaintiff,**

16 **STIPULATION OF DISMISSAL OF**  
17 **PLAINTIFF'S COMPLAINT AGAINST**  
18 **DEFENDANTS TAHIR JAMEEL BATH and**  
19 **UMARAN FAISAL BATH, individually and**  
20 **d/b/a MOUNTAIN MIKES PIZZA**

21 **vs.**

22 **TAHIR JAMEEL BATH, ET AL.,**

23 **Defendants.**

24 **IT IS HEREBY STIPULATED** by and between Plaintiff J & J SPORTS PRODUCTIONS,  
25 INC., and Defendants TAHIR JAMEEL BATH and UMARAN FAISAL BATH, individually and  
26 d/b/a MOUNTAIN MIKES PIZZA, that the above-entitled action is hereby dismissed **without**  
27 **prejudice** against TAHIR JAMEEL BATH and UMARAN FAISAL BATH, individually and d/b/a  
28 MOUNTAIN MIKES A/K/A MOUNTAIN MIKES PIZZA.

**IT IS FURTHER STIPULATED** that provided no Party referenced above has filed a motion  
to reopen this action by July 26, 2014, this Court shall *not* have jurisdiction to set aside the dismissal  
and the dismissal shall be deemed to be **with prejudice**.

///

///

///

///

1           This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1). Each Party  
2 referenced-above shall bear its own attorneys' fees and costs.

3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: May 8, 2014

\_\_\_\_\_  
/S/  
**LAW OFFICES OF THOMAS P. RILEY, P.C.**  
By: Thomas P. Riley  
Attorneys for Plaintiff  
J & J SPORTS PRODUCTIONS, INC.

Dated:

\_\_\_\_\_  
/S/  
**TINGLEY LAW GROUP, PC**  
By: Kevin Walter Isaacson  
Attorneys for Defendants  
TAHIR JAMEEL BATH and UMARAN FAISAL BATH,  
individually and d/b/a MOUNTAIN MIKES PIZZA

IT IS SO ORDERED.

Dated: **June 19, 2014**

  
\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE (SERVICE BY MAIL)**

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On May 8, 2014, I served:

**STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT AGAINST  
DEFENDANTS TAHIR JAMEEL BATH and UMARAN FAISAL BATH, individually  
and d/b/a MOUNTAIN MIKES PIZZA**

On all parties referenced by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Mr. Kevin W. Issacson, Esquire <b>TINGLEY LAW GROUP, PC</b> 10 Almaden Boulevard, Suite 430 San Jose, CA 95113	(Attorneys for Defendants Tahir Jameel Bath and Umaran Faisal Bath)
---	--

The fully sealed envelope with pre-paid postage was thereafter placed in our law firm's outbound mail receptacle in order that this particular piece of mail could be taken to the United States Post Office in South Pasadena, California later this day by myself (or by another administrative assistant duly employed by our law firm).

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on May 8, 2014, at South Pasadena, California.

1

2 Dated: May 8, 2014

3

---

**VANESSA VENTURA**

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28