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12 Attorneys for Plaintiff Theresa Ross

13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA

15 THERESA ROSS, individually, and
16 on behalf of other members of the
17 general public similarly situated,

18 Plaintiff,

19 vs.

20 JPMORGAN CHASE BANK, a New
21 York corporation; JPMORGAN
22 CHASE CALIFORNIA
23 CORPORATION, a California
24 Corporation; WANDA NEWELL, an
25 individual; and DOES 1 through 10,
26 inclusive,

27 Defendants.

Case No.1 : 12-cv-00914 AWI-JLT

**STIPULATION FOR VOLUNTARY
DISMISSAL WITH PREJUDICE
PURSUANT TO FED. R. CIV. PROC.
R. 41(a)(1)(A).**

Complaint Filed: March 14, 2012

INITIATIVE LEGAL GROUP APC
1800 CENTURY PARK EAST, SECOND FLOOR, LOS ANGELES, CALIFORNIA 90067

ORIGINAL

1 Plaintiff, THERESA ROSS ("Plaintiff") and Defendants JPMORGAN
2 CHASE BANK and WANDA NEWELL hereby stipulate to dismiss the above-
3 captioned action to pursuant to Rule 41(a) of the Federal Rules of Civil
4 Procedure as follows:

- 5 1. On March 14, 2012, Plaintiff filed the above-captioned complaint in the
6 Superior Court of California, Kern County;
- 7 2. On June 4, 2012, Defendant JPMorgan Chase Bank removed this action
8 to the United States District Court, Eastern District of California;
- 9 3. On June 11, 2012, Defendants JPMorgan Chase Bank and Wanda
10 Newell filed a Motion to Dismiss pursuant to Rule 12(b)(6) [Dkt. # 6];
- 11 4. In light of the information and evidence presented by the Motion to
12 Dismiss, Plaintiff has agreed to dismiss this action and her individual
13 PAGA claims with prejudice;
- 14 5. Defendant JPMorgan Chase California Corporation was never served
15 and never appeared in the above-captioned action; and
- 16 6. Defendants JPMorgan Chase Bank and Wanda Newell are the only
17 defendants who have appeared in the above-captioned action, and they
18 have agreed to waive all fees and costs in exchange for the dismissal
19 with prejudice.

20 **ACCORDINGLY, PLAINTIFF AND DEFENDANTS JPMORGAN**
21 **CHASE BANK AND WANDA NEWELL HEREBY STIPULATE AND**
22 **AGREE** that this action and Plaintiff's individual PAGA claims be dismissed

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 with prejudice for waiver of their fees and costs, pursuant to Federal Rule of
2 Civil Procedure 41(a)(1)(A)(ii).

3 Dated: July 9, 2012

Respectfully submitted,

Initiative Legal Group APC

6 By: 

Raul Perez
Melissa Grant
Arnab Banerjee

Attorneys for Plaintiff

10 Dated: July 9, 2012

Respectfully submitted,

Morgan, Lewis & Bockius LLP

13 By: /s/Christopher M. Robertson
(as authorized on July 9, 2012)

Carrie A. Gonell
Christopher M. Robertson

Attorneys for Defendants JP Morgan
Chase Bank and Wanda Newell

18 It is so Ordered, Dated: 7-10-12


United States District Judge