

1 **Thomas P. Riley, SBN 194706**
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9 **Attorneys for Plaintiff**
10 **J & J Sports Productions, Inc.**

FILED

MAY 22 2013

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____
DEPUTY CLERK

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

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

CASE NO. 1:12-cv-01952-AWI-SAB

14 **Plaintiff,**

STIPULATION OF DISMISSAL OF
PLAINTIFF'S COMPLAINT AGAINST
DEFENDANTS HECTOR R. RAMIREZ,
individually and d/b/a MARISCOS
SINALOA, and SINALOA SEA FOOD, INC.,
an unknown business entity d/b/a MARISCOS
SINALOA

15 **vs.**

16 **HECTOR R. RAMIREZ, et al.,**

17 **Defendants.**

18 **IT IS HEREBY STIPULATED** by and between Plaintiff J & J SPORTS PRODUCTIONS
19 **INC. and Defendants HECTOR R. RAMIREZ, individually and d/b/a MARISCOS SINALOA, and**
20 **SINALOA SEA FOOD, INC., an unknown business entity d/b/a MARISCOS SINALOA, that the**
21 **above-entitled action is hereby dismissed without prejudice against HECTOR R. RAMIREZ,**
22 **individually and d/b/a MARISCOS SINALOA, and SINALOA SEA FOOD, INC., an unknown**
23 **business entity d/b/a MARISCOS SINALOA, and subject to the Court's jurisdiction to enforce the**
24 **settlement agreement reached between the Parties.**

25 **IT IS FURTHER STIPULATED** that provided no Party referenced above has filed a motion
26 to reopen this action by October 25, 2013, this Court shall *not* have jurisdiction to set aside the
27 dismissal and the dismissal shall be deemed to be **with prejudice.**

28 **///**

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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.
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5
6 Dated: April 16, 2013



LAW OFFICES OF THOMAS P. RILEY, P.C.

7 By: Thomas P. Riley
8 Attorneys for Plaintiff
9 J & J SPORTS PRODUCTIONS, INC.
10

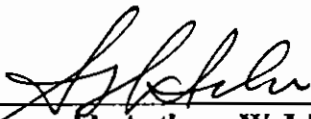
11 Dated: 4/24/13



LAW OFFICES OF NELSON F. GOMEZ

12 By: Nelson F. Gomez, Esquire
13 Attorneys for Defendants
14 HECTOR R. RAMIREZ, individually and d/b/a
15 MARISCOS SINALOA, and SINALOA SEA FOOD, INC., an
16 unknown business entity d/b/a MARISCOS SINALOA,
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22 **IT IS SO ORDERED:**
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26 **The Honorable Anthony W. Ishii**
27 **United States District Court**
28 **Eastern District of California**

Dated: 5-22-13

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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 April 16, 2013, I caused to serve the following documents entitled:

STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT AGAINST DEFENDANTS HECTOR R. RAMIREZ, individually and d/b/a MARISCOS SINALOA, and SINALOA SEA FOOD, INC., an unknown business entity d/b/a MARISCOS SINALOA

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 addressed to:

Mr. Nelson F. Gomez, Esquire (Attorneys for Defendants)
LAW OFFICES OF NELSON F. GOMEZ
4043 Geer Road
Hughson, CA 95326

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 April 16, 2013, at South Pasadena, California.

Dated: April 16, 2013


INESA MAMIDJANYAN