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GLINSKAS and ESTATE OF ROBERT PARIS,
JR

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

IRINA ENGERT, ANNE ENGERT, and RON
ENGERT, Individually and as Successors-in-
Interest to Glendon Engert,

Plaintiffs,

vs.

Case No.: 1:13-CV-00126-LJO-BAM

**STIPULATION TO DISMISS BANE ACT
CLAIM [CALIFORNIA CIVIL CODE § 52.1]
AGAINST ALL DEFENDANTS; ORDER**

1 STANISLAUS COUNTY; SHERIFF ADAM
2 CHRISTIANSON; ROBERT LEE PARIS, SR.
3 and ELIZABETH JANE PARIS, PERSONAL
4 REPRESENTATIVES TO THE ESTATE OF
5 DEPUTY SHERIFF ROBERT LEE PARIS,
6 JR.; DEPUTY MICHAEL GLINSKAS;
7 SERGEANT MANUEL MARTINEZ;
8 LIEUTENANT CLIFF HARPER; RT
9 FINANCIAL, INC.; RONI ROBERTS; and
10 DOES ONE through TWENTY-FIVE,
11 inclusive,

12 Defendants.

13
14 **TO THE COURT, TO ALL PARTIES, AND TO THEIR COUNSEL OF RECORD:**

15 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(ii), Plaintiffs IRINA, RON and ANNE
16 ENGERT (“Plaintiffs”) and Defendants COUNTY OF STANISLAUS, LIEUTENANT CLIFF
17 HARPER, SERGEANT MANUEL MARTINEZ, DEPUTY MICHAEL GLINSKAS and the ESTATE
18 OF DEPUTY ROBERT LEE PARIS, by and through their undersigned counsel, hereby stipulate as
19 follows:

20 (1) Any and all claims arising under the Bane Act, California Civil Code § 52.1, against
21 Defendants COUNTY OF STANISLAUS, LIEUTENANT CLIFF HARPER, SERGEANT MANUEL
22 MARTINEZ, DEPUTY MICHAEL GLINSKAS and the ESTATE OF DEPUTY ROBERT LEE
23 PARIS are dismissed with prejudice.

24 Each party shall bear its/his own attorney fees and costs incurred in regard to the prosecution
25 and defense of those claims.

26 **IT IS SO STIPULATED.**

27 Respectfully submitted,

28 Dated: March 20, 2015

WALKUP, MELODIA, KELLY & SCHOENBERGER

By Richard H. Schoenberger (as authorized march 20, 2015)
Richard H. Schoenberger
Spencer J. Pahlke
Attorneys for Plaintiffs
IRINA ENGERT, ANNE ENGERT, and RON ENGERT

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Dated: March 20, 2015

PORTER SCOTT
A PROFESSIONAL CORPORATION

By /s/ Terence J. Cassidy
Terence J. Cassidy
Lauren E. Calnero
Attorneys for Defendants
COUNTY OF STANISLAUS; SHERIFF ADAM
CHRISTIANSON; LIEUTENANT CLIFF HARPER

Dated: March 20, 2015

RIVERA & ASSOCIATES

By /s/ Jill B. Nathan (authorized March 16, 2015)
Jesse M. Rivera
Jill B. Nathan
Attorney for Defendant
SERGEANT MANUEL MARTINEZ

Dated: March 20, 2015

GOYETTE & ASSOCIATES

By /s/ Sean O'Dowd (authorized March 16, 2015)
Sean O'Dowd
Attorney for Defendant
SERGEANT MANUEL MARTINEZ

Dated: March 20, 2015

ANGELO, KILDAY & KILDUFF, LLP

By /s/ Amie C. McTavish (authorized March 16, 2015)
Bruce Kilday
Amie McTavish
Attorney for Defendants
DEPUTY MICHAEL GLINSKAS and ESTATE OF
DEPUTY ROBERT PARIS, JR

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ORDER

Having reviewed the above Stipulation, and good cause appearing,

IT IS HEREBY ORDERED that:

Any and all claims arising under the Bane Act, California Civil Code § 52.1, against Defendants COUNTY OF STANISLAUS, LIEUTENANT CLIFF HARPER, SERGEANT MANUEL MARTINEZ, DEPUTY MICHAEL GLINSKAS and the ESTATE OF DEPUTY ROBERT LEE PARIS are dismissed with prejudice.

Each party shall bear its/his own attorney fees and costs incurred in regard to the prosecution and defense of those claims.

Each party shall bear its/his own attorney fees and costs incurred in regard to the prosecution and defense of those claims.

IT IS SO ORDERED.

Dated: March 23, 2015

/s/ Lawrence J. O'Neill
UNITED STATES DISTRICT JUDGE