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7 Attorneys for Defendants  
 8 CORNERSTONE VALVE, LLC and NITESH K. GUPTA

9 UNITED STATES DISTRICT COURT  
 10 EASTERN DISTRICT OF CALIFORNIA

11 BAKERSFIELD PIPE & SUPPLY, INC., a  
 12 California Corporation doing business as  
 13 PALADON AMERICAS,

14 Plaintiffs,

15 vs.

16 CORNERSTONE VALVE, LLC, a Texas  
 17 Limited Liability Corporation; NITESH K.  
 18 GUPTA; and DOES 1 to 50, inclusive,

19 Defendants.

Case No.: 1:14-cv-01445---JLT

STIPULATION TO FILE EXHIBIT "A" TO  
 THE STIPULATED DIMISSAL AND  
 ORDER THEREON UNDER SEAL; AND  
 PROPOSED ORDER

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STIPULATION

1 The parties have reached a settlement in this case. Counsel for defendants and  
2 defendants wish to keep the terms of the settlement confidential and under seal. Courts  
3 regularly grant protective orders to protect confidential settlements agreements. *Phillips v.*  
4 *GMC*, 307 F.3d 1206, 1212 (9th Cir.2002) (citing *Hasbrouck v. BankAmerica Hous. Servs.*, 187  
5 F.R.D. 453, 455 (N.D.N.Y. 1999) and *Kalinauskas v. Wong*, 151 F.R.D. 363, 365-67 (D. Nev.  
6 1993)).

7 The parties hereby stipulate and request that the Court order that the settlement  
8 agreement and mutual release attached as Exhibit "A" to the document entitled "STIPULATED  
9 DISMISSAL AND ORDER THEREON" be filed under seal unless and until the defendants are  
10 in default under the terms of the settlement agreement and mutual release. The parties shall be  
11 entitled to seek to have the settlement agreement and mutual release attached as Exhibit "A"  
12 unsealed in the event that either party seeks to enforce any of the terms set forth in the  
13 settlement agreement and mutual release and the party not seeking enforcement of the  
14 agreement will take no action to oppose any such effort by the moving party.

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16 Dated: July 7, 2016

17 /s/ Matthew C. McCartney  
18 MATTHEW C. MCCARTNEY  
19 Attorney for Bakersfield Pipe & Supply, Inc.

20 Dated: July 7, 2016

21 //s// Sandeep G. Agarwal, Esq.  
22 Sandeep G. Agarwal, Esq.  
23 Attorney for Defendants CORNERSTONE  
24 VALVE, LLC and NITESH K. GUPTA

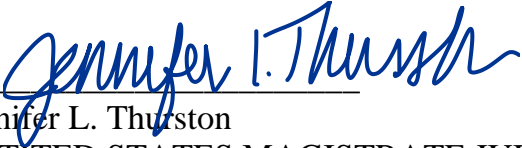
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ORDER

Based on the within stipulation, and good cause appearing therefor, the Court hereby  
orders as follows:

1. The document entitled stipulated dismissal and order thereon will be filed  
electronically without Exhibit "A" (the settlement agreement and mutual release) attached.

1           2.     Exhibit "A" (the settlement agreement and mutual release) to the stipulated  
2 dismissal and order thereon will be separately filed under seal according to Local Rule 141.

3           3.     A party seeking to enforce the agreement shall be entitled to seek to have Exhibit  
4 "A" (the settlement agreement and mutual release) unsealed in the event that the moving party  
5 seeks to take any action to enforce the settlement agreement and mutual release.

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7 Dated: 7/6/16 Signed:   
8 Jennifer L. Thurston  
9 UNITED STATES MAGISTRATE JUDGE  
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