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7 Attorneys for Defendants
8 FACULTATIEVE TECHNOLOGIES
9 THE AMERICAS, INC. and INCINERATOR
10 SPECIALISTS, INC.

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 JONATHAN SALAS,

14 Plaintiff,

15 v.

16 FACULTATIEVE TECHNOLOGIES
17 THE AMERICAS, INC., ET AL.,

18 Defendants.

Case No. 1:17-CV-00335-LJO-BAM

**STIPULATION RE: DISMISSAL OF
WAGE LOSS CLAIMS AND
INCINERATOR SPECIALISTS, INC.**

19 COME NOW PLAINTIFF JONATHAN SALAS [“Plaintiff”] AND DEFENDANTS
20 FACULTATIEVE TECHNOLOGIES THE AMERICAS, INC. and INCINERATOR
21 SPECIALISTS, INC. [“Defendants”] and enter into the following stipulation:

22 1. Plaintiff hereby withdraws his claim for lost wages, future lost wages and a loss in
23 earning capacity against Defendants. Plaintiff agrees to not introduce evidence or testimony at trial
24 regarding or relating to any lost wages, earnings and bonuses or any future lost wages, earnings,
25 bonuses or any loss in earning capacity. Plaintiff agrees to withdraw Victor Johnson as an
26 unretained expert, Plaintiff agrees that he shall not submit to the jury an instruction or jury verdict
27 requesting said damages listed above. This stipulation shall not prohibit Plaintiff from introducing
28 evidence of how his injuries cause him pain& suffering/ emotional distress at his work.

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2 2. Plaintiff agrees to dismiss INCINERATOR SPECIALISTS, INC. as a Defendant
3 in this action without prejudice.

4 3. Defendant INCINERATOR SPECIALISTS, INC. agrees, in exchange for its
5 dismissal, to waive its right to costs against Plaintiff.

6 **IT IS SO STIPULATED**

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8 DATED: October 1, 2019

MASTAGNI HOLSTEDT, A.P.C.

By: /Grant A. Winter/
GRANT A. WINTER
Attorney for Plaintiff

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11
12 DATED: October 1, 2019

ERICKSEN ARBUTHNOT

By: /Nathaniel R. Lucey/
NATHANIEL R. LUCEY
Attorney for Defendants Facultatieve
Technologies The Americas, Inc. and
Incinerator Specialists, Inc.

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16 **ORDER**

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18 Having reviewed the Stipulation set forth above, and FOR GOOD CAUSE APPEARING
19 THEREFORE, the above Stipulation is accepted, adopted and made the Order of the Court.
20 IT IS SO ORDERED.

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22 IT IS SO ORDERED.

23 Dated: **October 4, 2019**

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