

1 MICHAEL COGAN ATTORNEY AT LAW  
 MICHAEL COGAN (SBN: 65479)  
 2 1388 Court Street, Suite E  
 Redding, California 96001  
 3 Telephone: (530) 246-1112  
 Facsimile: (530) 243-6079  
 4 E-mail: [michaelcogan@sbcglobal.net](mailto:michaelcogan@sbcglobal.net)

5 NAGELEY, MEREDITH AND MILLER  
 ANDREA MILLER (SBN: 88992)  
 6 8001 Folsom Boulevard, Suite 100  
 Sacramento, California 95826  
 7 Telephone: (916) 386-8282  
 Facsimile: (916) 386-8952  
 8 E-mail: [AMiller@NMLawFirm.com](mailto:AMiller@NMLawFirm.com)

9 Attorneys for Plaintiffs

10 JACKSON LEWIS LLP  
 CARY G. PALMER (SBN 186601)  
 11 DALE R. KUYKENDALL (SBN 148833)  
 JERRY J. DESCHLER JR. (SBN 215691)  
 12 801 K Street, Suite 2300  
 Sacramento, California 95814  
 13 Telephone: (916) 341-0404  
 Facsimile: (916) 341-0141  
 14 E-mail: [palmerc@jacksonlewis.com](mailto:palmerc@jacksonlewis.com)  
 E-mail: [kuykendd@jacksonlewis.com](mailto:kuykendd@jacksonlewis.com)  
 15 E-mail: [deschlej@jacksonlewis.com](mailto:deschlej@jacksonlewis.com)

16 Attorneys for Defendant

17 UNITED STATES DISTRICT COURT  
 18 EASTERN DISTRICT OF CALIFORNIA

19 JAMES T. CARDEN, JR., ROBERT L. FOX,  
 LEON W. HEDERICK, ROBERT B. KLEE,  
 20 GEORGE M. LEMBO, LOREN E. LOVELAND,  
 TERRY D. MYERS, CHARLES R. SAMUELSON,  
 21 MICHAEL B. SCHAEFER, ARTHUR J.  
 SCHUBERT, THURLOW E. WILLIAMS,  
 22 MICHELLE W. WOODS, RAYMOND E.  
 YOUNG, WILLIAM H. ZIEGLER,

23 Plaintiffs,

24 v.

25 CHENEGA SECURITY PROTECTION  
 26 SERVICES, LLC,

27 Defendant.

Case No. 2:09-CV-01799-WBS-CMK

**STIPULATED REQUEST FOR  
 DISMISSAL WITH PREJUDICE AND  
 ORDER THEREON**

**COMPLAINT FILED: JUNE 3, 2009  
 TRIAL DATE: APRIL 5, 2011**

1 **TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 Pursuant to a Settlement Agreement and General Release between Defendant CHENEGA  
3 SECURITY PROTECTION SERVICES, LLC and Plaintiffs JAMES T. CARDEN, JR.,  
4 ROBERT L. FOX, LEON W. HEDERICK, ROBERT B. KLEE, LOREN E. LOVELAND,  
5 TERRY D. MYERS, CHARLES R. SAMUELSON, MICHAEL B. SCHAEFER, ARTHUR J.  
6 SCHUBERT, THURLOW E. WILLIAMS, MICHELLE W. WOODS, RAYMOND E. YOUNG,  
7 and WILLIAM H. ZIEGLER, the parties hereby stipulate and request that the aforementioned  
8 Plaintiffs and their claims be dismissed with prejudice in the above-entitled action. *See* Fed. R.  
9 Civ. P. 41(a)(1)(A)(ii) (requiring stipulation for voluntary dismissals after responsive pleadings  
10 have been filed).

11 Plaintiff GEORGE M. LEMBO has not settled his claim(s) and will remain as the sole  
12 Plaintiff in this action.

13  
14 Dated: January 20, 2011

MICHAEL COGAN, ATTORNEY AT LAW

15  
16 By: /s/ Michael Cogan (authorized 01/20 /11)  
17 Michael Cogan

18 Attorneys for Plaintiffs  
19 JAMES T. CARDEN, JR., ROBERT L.  
20 FOX, LEON W. HEDERICK, ROBERT  
21 B. KLEE, GEORGE M. LEMBO,  
22 LOREN E. LOVELAND, TERRY D.  
23 MYERS, CHARLES R. SAMUELSON,  
24 MICHAEL B. SCHAFFER, ARTHUR J.  
25 SCHUBERT, THURLOW E.  
26 WILLIAMS, MICHELLE W. WOODS,  
27 RAYMOND E. YOUNG, WILLIAM H.  
28 ZIEGLER

23 ///  
24 ///  
25 ///  
26 ///  
27 ///  
28 ///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: January 20, 2011

JACKSON LEWIS LLP

By: /s/ Dale R. Kuykendall (authorized 01/20/11)  
Cary G. Palmer  
Dale R. Kuykendall  
Jerry J. Deschler, Jr.

Attorneys for Defendant  
CHENÉGA SECURITY PROTECTION  
SERVICES, LLC

**ORDER**

IT IS HEREBY ORDERED that any and all claims of JAMES T. CARDEN, JR., ROBERT L. FOX, LEON W. HEDERICK, ROBERT B. KLEE, LOREN E. LOVELAND, TERRY D. MYERS, CHARLES R. SAMUELSON, MICHAEL B. SCHAEFER, ARTHUR J. SCHUBERT, THURLOW E. WILLIAMS, MICHELLE W. WOODS, RAYMOND E. YOUNG, and WILLIAM H. ZIEGLER in the above-referenced matter, U.S.D.C. E.D. Cal. Case No. 2:09-CV-01799-WBS-CMK, are hereby dismissed with prejudice.

**IT IS SO ORDERED.**

Dated: February 2, 2011

  
**CRAIG M. KELLISON**  
UNITED STATES MAGISTRATE JUDGE