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6 Attorneys for Defendant  
 FORD MOTOR COMPANY

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 8 UNITED STATES DISTRICT COURT  
 9 EASTERN DISTRICT OF CALIFORNIA

10  
 11 LIBERTY MUTUAL INSURANCE )  
 COMPANY, )  
 12 )  
 Plaintiff, )  
 13 )  
 vs. )  
 14 )  
 FORD MOTOR COMPANY; ELK GROVE )  
 15 FORD, and DOES 1 to 40, )  
 16 Defendants. )  
 17 )

Case No. 2:09-CV-02842-LLK-GGH

**STIPULATION AND ORDER  
 DISMISSING ACTION WITH  
 PREJUDICE**

Complaint filed: October 24, 2008

18  
 19 Pursuant to a settlement agreement and the execution of a General Release Agreement  
 20 between all parties in this matter, Plaintiff Liberty Mutual Insurance Company and  
 21 Defendant Ford Motor Company, by and through their respective attorneys of record, hereby  
 22 agree and stipulate pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure that this  
 23 Court may dismiss the above-entitled action WITH PREJUDICE.  
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Dated: December 8, 2009

Respectfully submitted,  
SHOOK, HARDY & BACON L.L.P.

By: /s/ Amir Nassihi  
RANDALL D. HAIMOVICI  
AMIR NASSIHI

Attorneys for Defendant  
FORD MOTOR COMPANY

Dated: December 8, 2009

Respectfully submitted,  
LAW OFFICES OF BRIAN J. FERBER, INC.

By: /s/ Brian J. Ferber (as authorized on 12/08/09)  
BRIAN J. FERBER


Attorneys for Plaintiff  
LIBERTY MUTUAL INSURANCE  
COMPANY

**[PROPOSED] ORDER DISMISSING ACTION WITH PREJUDICE**

Pursuant to the foregoing Stipulation, and good cause appearing therefore, the above-entitled action is HEREBY DISMISSED WITH PREJUDICE.

IT IS SO ORDERED:

Dated: December 11, 2009

  
LAWRENCE K. KARLTON  
SENIOR JUDGE  
UNITED STATES DISTRICT COURT