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9 **Attorneys for Plaintiff**
 10 **G & G Closed Circuit Events, LLC**

11 **UNITED STATES DISTRICT COURT**
 12 **EASTERN DISTRICT OF California**

13 **G & G Closed Circuit Events, LLC,**
 14
 15 **Plaintiff,**
 16
 17 **vs.**
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 19 **Clinton John Schue, et al.,**
 20
 21 **Defendants.**

22 **CASE NO. CV 10-0089 LKK KJN**

23 **STIPULATION OF DISMISSAL OF**
 24 **PLAINTIFF'S COMPLAINT**
 25 **AGAINST DEFENDANT CLINTON**
 26 **JOHN SCHUE, individually and d/b/a**
 27 **BROTHERS SPORTS BAR & GRILL;**
 28 **and CJS VENTURES, INC., an**
unknown business entity d/b/a
BROTHERS SPORTS BAR & GRILL

1 **IT IS HEREBY STIPULATED** by and between Plaintiff G & G CLOSED
 2 CIRCUIT EVENTS, LLC and Defendants CLINTON JOHN SCHUE, individually and
 3 d/b/a BROTHERS SPORTS BAR & GRILL, and CJS VENTURES, INC., an unknown
 4 business entity d/b/a BROTHERS SPORTS BAR & GRILL that the above-entitled
 5 action is hereby dismissed **without prejudice** against CLINTON JOHN SCHUE and ,
 6 individually and d/b/a BROTHERS SPORTS BAR & GRILL; and CJS VENTURES,
 7 INC., an unknown business entity d/b/a BROTHERS SPORTS BAR & GRILL to the
 8 Court's jurisdiction to enforce the settlement agreement reached between the Parties.

1 **IT IS FURTHER STIPULATED** that provided no Party referenced above has
2 filed a motion to reopen this action by March 1, 2012, this Court shall *not* have jurisdiction
3 to set aside the dismissal and the dismissal shall be deemed to be **with prejudice**.

4 This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1). Each
5 Party referenced-above shall bear its own attorneys' fees and costs.
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9 Dated: March 16, 2010

s/ Thomas P. Riley

LAW OFFICES OF THOMAS P. RILEY, P.C.

By: Thomas P. Riley

Attorneys for Plaintiff

G & G CLOSED CIRCUIT EVENTS, LLC

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15 Dated: March 17, 2010

s/ Gregory D. Ott

ALLING & JILLSON, LTD.

By: Gregory D. Ott, Esquire

Attorneys for Defendants

CLINTON JOHN SCHUE, individually and d/b/a

BROTHERS SPORTS BAR & GRILL, and

CJS VENTURES, INC., an unknown business entity

d/b/a BROTHERS SPORTS BAR & GRILL

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22 **IT IS SO ORDERED:**

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24 **DATED: March 26, 2010**

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LAWRENCE K. KARLTON

SENIOR JUDGE

UNITED STATES DISTRICT COURT

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2 **PROOF OF SERVICE (SERVICE BY MAIL)**

3
4 I declare that:

5 I am employed in the County of Los Angeles, California. I am over the age of
6 eighteen years and not a party to the within cause; my business address is First Library
7 Square, 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar
8 with this law firm's practice for collection and processing of correspondence/documents for
9 mail in the ordinary course of business.
10

11 On March 16, 2010, I served:

12 **STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT**
13 **AGAINST DEFENDANTS CLINTON JOHN SCHUE, individually and**
14 **d/b/a BROTHERS SPORTS BAR & GRILL, and CJS VENTURES, INC.,**
15 **an unknown business entity d/b/a BROTHERS SPORTS BAR & GRILL**

16 On all parties in said cause by enclosing a true copy thereof in a sealed envelope
17 with postage prepaid and following ordinary business practices, said envelope was duly
18 mailed and addressed to:

19
20 Mr. Gregory D. Ott, Esquire Attorneys for Defendants
21 ALLING & JILLSON, LTD.
22 276 Kingsbury Grade, Suite 200
Lake Tahoe, NV 89449

23 I declare under the penalty of perjury pursuant to the laws of the United States that
24 the foregoing is true and correct and that this declaration was executed on March 16,
25 2010, at South Pasadena, California.
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28 Dated: March 16, 2010

INESA MAMIDJANYAN