

1 **Thomas P. Riley, SBN 194706**  
 2 **LAW OFFICES OF THOMAS P. RILEY, P.C.**  
 3 **First Library Square**  
 4 **1114 Fremont Avenue**  
 5 **South Pasadena, CA 91030-3227**

6 **Tel: 626-799-9797**  
 7 **Fax: 626-799-9795**  
 8 **TPRLAW@att.net**

9 **Attorneys for Plaintiff**  
 10 **Joe Hand Promotions, Inc.**

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

13 **JOE HAND PROMOTIONS, INC.,**

14 **CASE NO. 2:10-cv-02104-WBS-EFB**

15 **Plaintiff,**

16 **STIPULATION OF DISMISSAL OF**  
 17 **PLAINTIFF'S COMPLAINT AGAINST**  
 18 **DEFENDANTS AMARJIT SINGH KHINDA**  
 19 **AND HARDEV KHINDA, individually and**  
 20 **d/b/a TEXAS BUFFALO WINGS AND**  
 21 **TEXAS BUFFALO WINGS, INC., an**  
 22 **unknown business entity, d/b/a TEXAS**  
 23 **BUFFALO WINGS**

24 **vs.**

25 **AMARJIT SINGH KHINDA, ET AL.,**

26 **Defendants.**

27 **IT IS HEREBY STIPULATED** by and between Plaintiff JOE HAND PROMOTIONS, INC.  
 28 and Defendants AMARJIT SINGH KHINDA AND HARDEV KHINDA, INDIVIDUALLY and  
 29 d/b/a TEXAS BUFFALO WINGS AND TEXAS BUFFALO WINGS, INC., an unknown business  
 30 entity, d/b/a TEXAS BUFFALO WINGS that the above-entitled action is hereby dismissed  
 31 **without prejudice** against AMARJIT SINGH KHINDA AND HARDEV KHINDA,  
 32 INDIVIDUALLY and d/b/a TEXAS BUFFALO WINGS AND TEXAS BUFFALO WINGS, INC.,  
 33 an unknown business entity, d/b/a TEXAS BUFFALO WINGS.

34 **IT IS FURTHER STIPULATED** that provided no Party referenced above has filed a  
 35 motion to reopen this action by February 5, 2012, the dismissal shall be deemed to be **with**  
 36 **prejudice.**

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1 This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1). Each Party  
2 referenced-above shall bear its own attorneys' fees and costs.

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Dated: January 11, 2012


/s/ Thomas P. Riley  
**LAW OFFICES OF THOMAS P. RILEY, P.C.**  
By: Thomas P. Riley  
Attorneys for Plaintiff  
JOE HAND PROMOTIONS, INC.

Dated:

/s/ Bruce C. Piontkowski  
**TINGLEY PIONTKOWSKI, LLP**  
By: Bruce C. Piontkowski, Esquire  
Attorney for Defendants AMARJIT SINGH KHINDA  
AND HARDEV KHINDA, individually  
and d/b/a TEXAS BUFFALO WINGS and  
TEXAS BUFFALO WINGS, INC., an unknown  
business entity, d/b/a TEXAS BUFFALO WINGS

**IT IS SO ORDERED:**

DATED: January 13, 2012

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE

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

I declare that:

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

On January 11, 2012, I served:

**STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT AGAINST DEFENDANTS AMARJIT SINGH KHINDA AND HARDEV KHINDA, individually and d/b/a TEXAS BUFFALO WINGS AND TEXAS BUFFALO WINGS, INC., an unknown business entity, d/b/a TEXAS BUFFALO WINGS**

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

Mr. Bruce Piontkowski, Esquire  
**TINGLEY PIONTKOWSKI, LLP**  
10 Almaden Blvd., Suite 430  
San Jose, CA 95113

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on January 11, 2012, at South Pasadena, California.

Dated: January 11, 2012

/s/Maria Baird  
MARIA BAIRD

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