

1 LYNN HUBBARD III, SBN 69773  
 2 SCOTTLYNN J HUBBARD IV, SBN 212970  
 3 DISABLED ADVOCACY GROUP, APLC  
 4 12 Williamsburg Lane  
 5 Chico, CA 95926  
 6 Telephone: (530) 895-3252  
 7 Facsimile: (530) 894-8244

8 Attorneys for Plaintiff

9 JEFFREY LENKOV, SBN 156478  
 10 JAMIE L. FUGERE, SBN 228389  
 11 MANNING & KASS, ELLROD,  
 12 RAMIREZ, TRESTER, LLP  
 13 15<sup>th</sup> Floor at 801 Tower  
 14 801 South Figueroa Street  
 15 Los Angeles, CA 90017  
 16 Telephone: (213) 624-6900  
 17 Facsimile: (213) 624-6999  
 18 Email: jzf@mmker.com

19 Attorneys for Defendant  
 20 KOHL'S DEPARTMENT STORES, INC.

21 UNITED STATES DISTRICT COURT  
 22 EASTERN DISTRICT OF CALIFORNIA

23 TONY MARTINEZ,  
 24 Plaintiff,

25 Case No. 2:10-CV-02205-JAM-GGH  
 26 STIPULATION FOR DISMISSAL and  
 27 ORDER THEREON

28 v.

29 KOHL'S DEPARTMENT STORES,  
 30 INC. dba KOHL'S #0680,  
 31 Defendant.

\_\_\_\_\_ /

1 TO THE COURT AND ALL PARTIES:

2 Plaintiff, TONY MARTINEZ, and defendant, KOHL'S DEPARTMENT  
3 STORES, INC. dba KOHL'S #0680, stipulate to and jointly request that this Court  
4 enter a dismissal with prejudice of plaintiff's complaint in the above-entitled action  
5 in its entirety pursuant to Fed. R. Civ. P. 41(a)(2).

6  
7 Dated: April 12, 2011

DISABLED ADVOCACY GROUP, APLC

8  
9 /s/ Lynn Hubbard III  
LYNN HUBBARD III  
10 Attorney for Plaintiff

11 Dated: April 12, 2011

MANNING & KASS, ELLROD,  
12 RAMIREZ, TRESTER, LLP

13 /s/ Jamie L. Fugere  
14 JAMIE L. FUGERE  
15 Attorney for Defendant  
16 KOHL'S DEPARTMENT STORES, INC.

17  
18 **ORDER**

19 IT IS HEREBY ORDERED that the complaint of plaintiff, USDC Case No.  
20 2:10-CV-02205-JAM-GGH, is hereby dismissed with prejudice.

21 Dated: 4/12/2011

22 /s/ John A. Mendez  
United States District Court Judge

23  
24  
25  
26  
27  
28