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JEFFER MANGELS BUTLER & MITCHELL LLP  
MARTIN H. ORLICK (Bar No. 083908) morlick@jmbm.com  
MATTHEW S. KENEFICK (Bar No. 227298) mkenefick@jmbm.com  
Two Embarcadero Center, Fifth Floor  
San Francisco, California 94111-3824  
Telephone: (415) 398-8080  
Facsimile: (415) 398-5584

Attorneys for Defendant Highway 88 and 99 Land Company, a  
limited partnership

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

ROBERT KALANI,  
  
Plaintiff,  
  
v.  
  
ERNIE FEDERICO dba PERKO'S CAFÉ;  
HIGHWAY 88 and 99 LAND COMPANY, a  
LIMITED PARTNERSHIP,  
Defendants.

---

AND RELATED CROSS-CLAIM

CASE NO. 2:13-cv-00272-WBS-CKD  
  
**STIPULATION FOR DISMISSAL OF  
DEFENDANT HIGHWAY 88 AND 99 LAND  
COMPANY'S CROSS-CLAIM**

Complaint filed: February 13, 2013

IT IS HEREBY STIPULATED by and between Cross-Complainant Highway 88 and  
99 Land Company ("Cross-Complainant") and Cross-Defendant Earnest A. Federico, dba Perko's  
Café ("Cross-Defendant") the parties in the cross action, by and through their respective counsel,  
pursuant to Federal Rule of Civil Procedure 41 (a)(1) (A) (ii), that the Cross-Complaint in the  
above-captioned action be dismissed with prejudice. Each party shall bear its own attorney's fees  
and costs.

Date: January 26, 2015

JEFFER MANGELS BUTLER & MITCHELL LLP  
MARTIN H. ORLICK  
MATTHEW S. KENEFICK

By /s/ Matthew S. Kenefick  
MATTHEW S. KENEFICK, ESQ.  
Attorney for Defendant/Cross-Complainant  
HIGHWAY 88 and 99 LAND COMPANY, a  
LIMITED PARTNERSHIP

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Date: January 26, 2015

MICHAEL WELCH AND ASSOCIATES

By /s/ Michael D. Welch  
MICHAEL D. WELCH, ESQ.  
Attorney for Defendant/Cross-Defendant Earnest A.  
Federico, dba Perko's Cafe

**ATTESTATION**

The filer of this document hereby attests that concurrence in the filing of this document has been obtained from each of the signatories listed above.

DATED: January 26, 2015

JEFFER MANGELS BUTLER & MITCHELL LLP

By: /s/ Matthew S. Kenefick  
MATTHEW S. KENEFICK  
Attorneys for HIGHWAY 88 and 99 LAND  
COMPANY, a LIMITED PARTNERSHIP


**ORDER**

The parties having so stipulated,

IT IS HEREBY ORDERED that Cross-Complainant's Cross-Claim in this action be dismissed with prejudice. Each party shall bear its own attorney's fees and costs.

**IT IS SO ORDERED.**

**Dated: January 30, 2015**

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE