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8 Attorneys for Plaintiff,
9 UNITED GENETICS TURKEY TOHUM FIDE A.S.,
10 formerly known as TAT TOHUMCULUK A. S.

11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE EASTERN DISTRICT OF CALIFORNIA,**

13 UNITED GENETICS TURKEY TOHUM
14 FIDE A.S., formerly known as TAT
15 TOHUMCULUK A. S., a Turkish company,

16 Plaintiff,

17 v.

18 H.J. HEINZ COMPANY, L.P., a Pennsylvania
19 Limited Partnership registered to do business
20 in California, and HEINZSEED, an
21 unincorporated division of H.J. HEINZ
22 COMPANY, L.P,

23 Defendants.

CASE NO. 2:13-cv-00773-WBS-KJN

**STIPULATED REQUEST FOR
DISMISSAL, WITH PREJUDICE**

FED. R. CIV. P. 41(a)(2)

24 IT IS HEREBY STIPULATED AND AGREED, pursuant to Federal Rules of Civil
25 Procedure, Rule 41(a)(2), by and between each and every party to this stipulation, by and through
26 the signatures of their respective counsel on this stipulation, that the parties to this stipulation wish
27 to formally acknowledge and obtain a court order dismissing the entire instant action, as follows:

28 1. IT IS HEREBY STIPULATED, by and among Plaintiff UNITED GENETICS
TURKEY TOHUM FIDE A.S., formerly known as TAT TOHUMCULUK A. S., a Turkish
company ("Plaintiff") and Defendants H.J. HEINZ COMPANY, L.P., a Pennsylvania Limited
Partnership registered to do business in California, and HEINZSEED, an unincorporated division
of H.J. HEINZ COMPANY, L.P. ("Defendants") that they are requesting that a Court order be

1 entered dismissing, *with prejudice*, the entire instant action, pursuant to a settlement reached by
2 Plaintiff and Defendants as a result of a successful mediation session.

3 2. The undersigned represent and warrant that they have all requisite authority to bind
4 the respective parties to the terms of the stipulation.

5 3. This stipulation may be executed in any number of counterparts with the same
6 effect as if all signatories had signed the same documents. All counterparts must be construed
7 together to constitute one instrument.
8

9 4. Each party shall bear that party's own costs and attorneys' fees in connection with
10 this stipulation.

11 SO STIPULATED.

12 Dated: April 20, 2015

ANASTASSIOU & ASSOCIATES

13 By: /s/ Effie F. Anastassiou
14 Effie F. Anastassiou, Esq.
15 Attorneys for Plaintiff,
16 UNITED GENETICS TURKEY TOHUM
17 FIDE A.S., formerly known as TAT
18 TOHUMCULUK A. S.

18 Dated: April 20, 2015

GORDON & REES LLP

19 By: /s/ Sean P. Flynn
20 Sean P. Flynn, Esq.
21 Attorneys for Defendants,
22 H.J. HEINZ COMPANY, L.P. and
23 HEINZSEED, an unincorporated division of
24 H.J. HEINZ COMPANY, L.P.


ORDER

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PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that the entire instant
action is hereby dismissed, *with prejudice*.

SO ORDERED.

Dated: April 20, 2015



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE