

1 CLAUDIA QUINTANA  
 City Attorney, SBN 178613  
 2 BY: KELLY J. TRUJILLO  
 Deputy City Attorney, SBN 244286  
 3 CITY OF VALLEJO, City Hall  
 555 Santa Clara Street, P.O. Box 3068  
 4 Vallejo, CA 94590  
 Tel: (707) 648-4545  
 5 Fax: (707) 648-4687

6 MARK A. JONES, SBN 96494  
 KRISTEN K. PRESTON, SBN 125455  
 7 JONES & DYER  
 A Professional Corporation  
 8 1800 J Street  
 Sacramento, CA 95811  
 9 Tel: (916) 552-5959  
 Fax: (916) 442-5959  
 10

11 Attorneys for Defendants City of Vallejo, Officer Dustin B. Joseph,  
 Officer Sean G. Kenney and Vallejo Chief of Police Joseph M. Kreins  
 12

13 IN THE UNITED STATES DISTRICT COURT  
 14 EASTERN DISTRICT OF CALIFORNIA

15 JOSEPH L. JOHNSON, an individual,  
 CYNTHIA A. MITCHELL, an individual,  
 16 and as successor-in-interest and personal  
 representative of decedent MARIO D.S.M.  
 17 ROMERO,

Case No.: 2:13-CV-01072-JAM-KJN  
 (Related to Case No.: 2:13-CV-02060-  
 JAM-KJN)

STIPULATION AND ORDER FOR  
 DISMISSAL

18 Plaintiffs,

19 vs.

**Honorable John A. Mendez**

20 THE CITY OF VALLEJO, a municipality  
 and charter city, POLICE OFFICER  
 21 DUSTIN B. JOSEPH, an individual,  
 POLICE OFFICER SEAN G. KENNEY,  
 22 an individual, VALLEJO CHIEF OF  
 POLICE JOSEPH M. KREINS, an  
 23 individual and DOES 1-5, inclusive,

24 Defendants.

25  
 26 IT IS HEREBY stipulated and agreed by and between all plaintiffs and defendants City of  
 27 Vallejo, Officer Dustin B. Joseph, Officer Sean G. Kenney and Vallejo Chief of Police Joseph M.  
 28 Kreins by and through their undersigned counsel, that the complaint 2:13-CV-01072-JAM-KJN and

1 related case no. 2:13-02060-JAM-KJN filed herein be dismissed with prejudice as to all defendants  
2 pursuant to Federal Rules of Civil Procedure Rule 41(a)(2), each party to bear their own attorney's  
3 fees and costs.

4 Dated: August 14, 2015

BOWLES & VERNA LLP

6 By: /s/ Michael P. Verna  
7 MICHAEL P. VERNA  
8 LAWRENCE D. GOLDBERG  
9 Attorneys for Plaintiffs JOSEPH L. JOHNSON and  
10 CYNTHIA A. MITCHELL, individually and as  
11 successor-in-interest and personal representative of  
12 decedent MARIO D. S. M. ROMERO, and JOHN  
13 WILSON, individually and as successor-in-interest  
14 to decedent MARIO D.S.M. ROMERO

12 Dated: August 14, 2015

THE HALEY LAW OFFICES, P.C.

14 By: /s/ Matthew D. Haley  
15 MATTHEW D. HALEY  
16 CATHERINE HALEY  
17 FULVIO F. CAJINA  
18 Attorneys for Plaintiffs NXXXXXX RXXXXX, a  
19 minor, by and through her guardian ad litem,  
20 NATASHA STEPHENS, individually and  
21 Successor in Interest to Decedent MARIO  
22 ROMERO; CYNQUITA MARTIN, individually  
23 and as guardian ad litem for DXXXXX MXXXXX,  
24 and DXXXXX MXXXXX, both minors,; AHN  
25 KHE HARRIS, individually; and AHN LOC  
26 HARRIS, individually

24 DATE: August 14, 2015

CITY OF VALLEJO ATTORNEY

26 By: /s/ Kelly J. Trujillo  
27 CLAUDIA QUINTANA  
28 KELLY TRUJILLO  
Attorneys for Defendants City of  
Vallejo, Officer Dustin B. Joseph,  
Officer Sean G. Kenney and Vallejo  
Chief of Police Joseph M. Kreins

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATE: August 14, 2015

JONES & DYER

By: /s/ Mark A. Jones  
MARK A. JONES  
KRISTEN K. PRESTON  
Attorneys for Defendants City of  
Vallejo, Officer Dustin B. Joseph,  
Officer Sean G. Kenney and Vallejo  
Chief of Police Joseph M. Kreins

**ORDER**

IT IS SO ORDERED.

DATE: 8/14/2015

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