

1 DAVID P. FOOS (SBN: 083430)  
2 **FOOS | GAVIN LAW FIRM, P.C.**  
3 3947 Lennane Drive, Suite 120  
4 Sacramento, CA 95834  
5 T: 916.779.3500  
6 F: 916.779.3508  
7 E: david@foosgavinlaw.com

8 Attorney for Plaintiff,  
9 SAMBATH PROEUNG

10 JEREMY A. MEIER - SBN 139849  
11 JENNIFER M. HOLLY - SBN 263705  
12 GREENBERG TRAUIG, LLP  
13 1201 K Street, Suite 1100  
14 Sacramento, CA 95814-3938  
15 Telephone: (916) 442-1111  
16 Facsimile: (916) 448-1709  
17 meierj@gtlaw.com  
18 hollyj@gtlaw.com

19 Attorneys for Defendant,  
20 MAXIMUS, Inc.

21 **UNITED STATES DISTRICT COURT**  
22 **EASTERN DISTRICT OF CALIFORNIA**

23 SAMBATH PROEUNG,

24 Plaintiff,

25 v.

26 MAXIMUS, INC., a California  
27 Corporation, and DOES 1 through  
28 50, inclusive,

Defendants.

Case No.: 2:14-cv-00063-MCE-KJN

**JOINT STIPULATION FOR DISMISSAL  
WITH PREJUDICE, PURSUANT TO  
F.R.C.P. RULE 41(a)(1); AND [PROPOSED]  
ORDER**

WHEREAS Plaintiff SAMBATH PROEUNG and Defendant MAXIMUS, INC. agree that all claims in the above-captioned proceeding have been fully settled and compromised;

IT IS HEREBY STIPULATED by and between the parties to this action, through their undersigned counsel, that the above-captioned action be and hereby is *dismissed with prejudice* as to Defendant MAXIMUS, INC. pursuant to F.R.C.P. 41(a)(1);

1 IT IS FURTHER STIPULATED by and between the parties that each party shall bear its  
2 own attorneys' fee and costs of suit.

3 IT IS FURTHER STIPULATED by and between the parties that the parties mutually  
4 and fully release and forever discharge each other and their agents from any and all actions,  
5 suits, demands, debts, expenses, accounts, reckonings, obligations, costs, rights, agreements,  
6 promises, liabilities, liens, damages, or causes of action that may stem from any of the facts or  
7 causes of actions alleged in this lawsuit including, but not limited to, any and all claims known  
8 or unknown, including any common law claims, debts, liabilities, demands, damages, charges,  
9 promises, acts, agreements, claims for negligence, costs and expenses (including any claim for  
10 attorneys' fees), actions and causes of action, or any claim for violation of civil rights or of any  
11 other state or federal statute or constitution. This release extends to the parties SAMBATH  
12 PROEUNG and MAXIMUS, INC. in all capacities.

13 Date: March 13, 2015

Respectfully Submitted,

14 FOOS GAVIN LAW FIRM, P.C.

15  
16 By: /s/ David P. Foos  
17 David P. Foos (SBN: 083430)  
Attorney for Plaintiff, SAMBATH PROEUNG

18 Date: March 13, 2015

Respectfully Submitted,

19 GREENBURG TRAUIG, LLP

20 By: /s/ Jeremy A. Meier  
21 Jeremy A. Meier (SBN: 139849)

22 By: /s/ Jennifer M. Holly  
23 Jennifer M. Holly (SBN: 167533)

24 Attorneys for Defendant, MAXIMUS, INC.  
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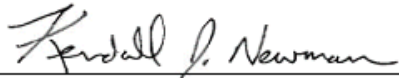
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~~[PROPOSED]~~ **ORDER**

In view of the parties' Stipulation, the Court orders the above-captioned action be dismissed with prejudice, in its entirety. Each party to this action shall bear its own attorneys' fees and costs of suit.

**IT IS SO ORDERED.**

Dated: March 16, 2015

  
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KENDALL J. NEWMAN  
UNITED STATES MAGISTRATE JUDGE