

1 DIEPENBROCK & COTTER, LLP
 JOHN P. COTTER, State Bar No. 158783
 2 GLEN A. WILLIAMS, State Bar No. 257665
 1545 River Park Drive, Suite 201
 3 Sacramento, California 95815
 Telephone: (916) 565-6222
 4 Telecopier: (916) 565-6220

5 Attorneys for Defendants
 HARVINDER SIDHU and
 6 J S CARRIER EXPRESS INC.

7
 8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

10
 11 EKATERINA BOZHADZE and TINATIN
 DUDA as guardian ad litem of N.M. and
 12 S.M.,

13 Plaintiffs,

14 vs.

15 HARVINDER SIDHU, J S CARRIER
 EXPRESS INC. and DOES 1 through 10,
 16 inclusive,

17 Defendants.

Case No.: 2:14-cv-02758-MCE-KJN

STIPULATION TO REMAND CASE TO
 SAN JOAQUIN COUNTY SUPERIOR
 COURT; ORDER

18
 19 Defendants HARVINDER SIDHU and J S CARRIER EXPRESS INC. (collectively
 20 hereinafter “Defendants”) and Plaintiffs EKATERINA BOZHADZE and TINATIN DUDA as
 21 guardian ad litem of N.M. and S.M. (collectively “Plaintiffs”), by and through their respective
 22 counsel of record, hereby agree and stipulate as follows:

23 **STIPULATION**

24 1. WHEREAS, on October 3, 2014, Plaintiffs commenced an action in the Superior
 25 Court of California in and for the County of San Joaquin titled *Ekaterina Bozhadze, et al., v.*
 26 *Harvinder Sidhu, et al.*, as Case No. 39-2014-00316886-CU-PA-STK (“the Action”).

27 2. WHEREAS, on November 24, 2014, Defendants filed a Notice of Removal of
 28 Action Under 27 U.S.C. 1441(b) with the United States District Court for the Eastern District of

1 California.

2 3. WHEREAS, Plaintiffs agree not to move this Court to remand the case to San
3 Joaquin County Superior Court or for recovery of Plaintiffs' attorney fees and costs to bring such
4 a motion.

5 4. NOW THEREFORE, Plaintiffs and Defendants stipulate that the Action should
6 immediately be remanded to the San Joaquin County Superior Court, with each party bearing
7 his/her/its own respective attorney fees and costs with respect to the removal and subsequent
8 remand of the Action pursuant to this Stipulation and Order.

9 5. The Stipulation moots any/all pending motions before this Court and any/all
10 pleadings filed in this Court, and any/all pending deadlines or hearings should be taken off this
11 Court's calendar.

12 6. For convenience, upon remand, the time for Defendants to file a responsive
13 pleading to Plaintiffs' complaint in the Superior Court will be 30 days from the date of this
14 Court's execution of the order remanding the Action.

15

16 DATED: December 19, 2014 DIEPENBROCK & COTTER, LLP

17 /s/ John P. Cotter
18 By: _____
19 JOHN P. COTTER
20 GLEN A. WILLIAMS
21 Attorneys for Defendants
22 HARVINDER SIDHU and
23 J S CARRIER EXPRESS INC.

24 DATED: December 19, 2014 THE BRANDI LAW FIRM

25 /s/ Daniel Dell'Osso (authorized via email 12/19/14)
26 By: _____
27 DANIEL DELL'OSSO
28 Attorneys for Plaintiffs
EKATERINA BOZHADZE and TINATIN DUDA as
guardian ad litem of N.M. and S.M.

