

1 JOHN L. BURRIS, Esq. (SBN 69888)  
DeWITT M. LACY, Esq. (SBN 258789)  
2 **THE LAW OFFICES OF JOHN L. BURRIS**  
3 Airport Corporate Centre  
7677 Oakport Street, Suite 1120  
4 Oakland, California 94621  
Telephone: (510) 839-5200  
5 Facsimile: (510) 839-3882  
john.burris@johnburrislaw.com  
6 dewitt.lacy@johnburrislaw.com

7 Attorneys for Plaintiffs  
SYLVIA HAYNES  
8 ANNTIONETT HAYNES

10 **UNITED STATES DISTRICT COURT**

11 **EASTERN DISTRICT OF CALIFORNIA (SACRAMENTO DIVISION)**

13 SYLVIA HAYNES, successor-in-interest  
to Donald Ray Haynes, ANNTIONETT  
14 HAYNES, individually; THE ESTATE OF  
DONALD RAY HAYNES

15 Plaintiffs,

16 v.

17 ROBERT JOHNSON, individually and in  
18 his official capacity as a police officer for  
the City of Stockton Police Department;  
19 WILLIAM KAMBIC, individually and in  
his official capacity as a police officer for  
20 the City of Stockton Police Department;  
DANA MOSHER, individually; RYAN  
21 MORRIS, individually and in his official  
capacity as a police officer for the City of  
22 Stockton Police Department; and DOES 1-  
25, inclusive, individually, jointly and  
23 severally,

24 Defendants.

Case No. 2:15-cv-00565-WBS-DB

**STIPULATION AND [Proposed] OF  
DISMISSAL OF ENTIRE ACTION WITH  
PREJUDICE**

27 Stipulation and [Proposed] Order of Dismissal of Entire Action with Prejudice  
2:15-cv-00565-WBS-DB

1           **IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES, through**  
2 **their attorneys of record:**

3           Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the parties, by and  
4 through their attorneys of record, stipulate that the entire action including all claims against all  
5 defendants shall be dismissed with prejudice, each party to bear its own costs and fees. The  
6 parties have fully executed the terms of a Release Agreement and dismissal should be granted  
7 pursuant to Federal Rule of Civil Procedure 41(a)(2).

8  
9 SO STIPULATED.

10  
11 Dated: August 31, 2017

**LAW OFFICES OF JOHN L. BURRIS**

12 By: /s/ DeWitt M. Lacy  
13 DeWitt M. Lacy  
14 Attorney(s) for Plaintiffs

15 Dated: August 31, 2017

**COTA COLE LLP**

16 By: \*/s/  
17 Ronald Scholar  
18 \*Mr. Scholar provided consent that this  
19 document be electronically filed.

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

**ORDER**

IS IT HEREBY ORDERED that this action is hereby dismissed in its entirety as against all defendants with prejudice, each party to bear its own costs and fees.

Dated: September 1, 2017



---

**WILLIAM B. SHUBB**  
**UNITED STATES DISTRICT JUDGE**