

Polsinelli LLP  
Three Embarcadero Center, Suite 1350  
San Francisco, CA 94111  
415.248.2100

1 **POLSINELLI LLP**  
Charles O. Thompson (SBN 139841)  
2 cthompson@polsinelli.com  
Garrett Parks (SBN 297971)  
3 gparks@polsinelli.com  
Three Embarcadero Center, Suite 1350  
4 San Francisco, California 94111  
Phone: (415) 248-2100 | Fax: (415) 248-2101

5 Attorneys for Defendant  
6 **SAFE HAVEN SECURITY SERVICES, INC.**

7 **UNITED STATES DISTRICT COURT**  
8 **EASTERN DISTRICT OF CALIFORNIA**  
9

10 DENNIS FOX,  
11 Plaintiff,  
12 vs.  
13 SAFE HAVEN SECURITY SERVICES,  
INC., a corporation; DOES 1 through 20,  
14 inclusive,  
15 Defendants.

Case No.: 2 :15-cv-01639-MCE-CKD

**ORDER AND STIPULATION FOR  
DISMISSAL WITH PREJUDICE**

16 Plaintiff Dennis Fox (“Plaintiff”) and Defendant Safe Haven Security Services, Inc. (“Safe  
17 Haven”), through their counsel, stipulate and agree as follows:

- 18 1. On July 22, 2015, Plaintiff filed a complaint for damages against Safe Haven in the  
19 Superior Court of California, County of Sacramento, Case No. 34-2015-00182093 (“State Court  
20 Complaint”).
- 21 2. On July 31, 2015, before service, Safe Haven removed the State Court Complaint  
22 to this court (collectively, the “Action”).
- 23 3. On August 20, 2015, the parties participated in mediation to attempt to resolve the  
24 Action in its entirety.
- 25 4. The mediation resulted in the parties resolving the Action and entering into a  
26 Confidential Settlement Agreement and General Release of Claims (“Settlement Agreement”).
- 27 5. The parties agreed to dismiss the Action with prejudice, with each party to bear  
28 their own attorneys’ fees and costs.

1           6.       Plaintiff further agrees that this stipulation will be enforceable in any future action  
2 filed against Safe Haven arising out of or relating to the facts supporting the allegations set forth in  
3 the Action.

4           Counsel for Safe Haven represents that it has the consent of Plaintiff's counsel to affix its  
5 electronic signature to this stipulation on file it on both behalf of the parties.

6  
7 Dated: September 24, 2015

POLSINELLI LLP

8  
9 By: /s/ Charles O. Thompson  
CHARLES O. THOMPSON

10 Attorneys for Defendant Safe Haven  
Security Services, Inc.

11  
12 Dated: September 24, 2015

LAW OFFICES OF WILLIAM F.  
WRIGHT


13  
14 By: /s/ Julie A. Doumit  
JULIE A. DOUMIT

15 Attorneys for Plaintiff Dennis Fox

16  
17  
18 **ORDER**

19 Pursuant to the parties Stipulation for Dismissal with Prejudice, the Court hereby orders  
20 the above-captioned action dismissed in its entirety with prejudice, each party to bear their own  
21 attorneys' fees and costs. IT IS SO ORDERED.

22  
23 Dated: September 25, 2015

24  
25   
26 MORRISON C. ENGLAND, JR., CHIEF JUDGE  
27 UNITED STATES DISTRICT COURT  
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