

1 DAVID E. MASTAGNI, ESQ. (SBN 204244)
 2 ISAAC S. STEVENS, ESQ. (SBN 251245)
 3 ACE T. TATE, ESQ. (SBN 262015)
MASTAGNI HOLSTEDT
 4 A Professional Corporation
 1912 "I" Street
 5 Sacramento, California 95811
 Telephone: (916) 446-4692
 6 Facsimile: (916) 447-4614
 davidm@mastagni.com
 7 istevens@mastagni.com
 atate@mastagni.com

Attorneys for Plaintiffs

8 ARTHUR A. HARTINGER (SBN 121521)
 9 ahartinger@publiclawgroup.com
 KEVIN P. MCLAUGHLIN (SBN 251477)
 10 kmclaughlin@publiclawgroup.com
RENNE SLOAN HOLTZMAN SAKAI LLP
 11 1220 Seventh Street, Suite 300
 Berkeley, California 94710
 12 Telephone: (510) 995-5800
 Facsimile: (415) 678-3838

Attorneys for Defendant
CITY OF VALLEJO

15 IN THE UNITED STATES DISTRICT COURT
 16 EASTERN DISTRICT OF CALIFORNIA

18	MAT MUSTARD, BENJAMIN HILL, on)	Case No. 2:16-cv-01485-KJM-CKD
19	behalf of themselves and all similarly situated)	
20	individuals,)	STIPULATION FOR DISMISSAL WITH
21	Plaintiffs,)	PREJUDICE; ORER THEREON
22	v.)	
23	CITY OF VALLEJO,)	
24	Defendant.)	

STIPULATION

The parties to this action hereby stipulate as follows:

1. WHEREAS, on April 13, 2017 the parties filed a Stipulation Regarding Approval of

1 Settlement Agreement, attaching a copy of the signed settlement agreement (Dkt. No. 28).

2 2. WHEREAS, on May 19, 2017 the Court issued an Order Granting Approval of
3 Settlement, reserving jurisdiction over this action for the purposes of entering dismissal and
4 enforcing the settlement agreement (Dkt. No. 30).

5 3. WHEREAS, on June 9, 2017, pursuant to stipulation by the parties, the Court approved
6 modification of the Notice of Settlement and Claim Form and Release attached to the settlement
7 agreement, and confirmed the Court will not enter an order dismissing this action with prejudice
8 until the parties jointly request that the Court enter such an order (Dkt. No. 32).

9 4. WHEREAS, the City has caused the Notice of Settlement and Claim Form and Release to
10 be sent to all Putative Plaintiffs;

11 5. WHEREAS, the deadline to submit completed claim forms for most Putative Plaintiffs
12 has expired, and Defendant agrees not to exercise any right to withdraw it may have.

13 THEREFORE, IT IS HEREBY STIPULATED, by and between the parties, through their
14 respective counsel, that:

- 15 1. It is now appropriate to dismiss this action.
16 2. The parties request the Court issue an order dismissing this action with prejudice.

17 Respectfully submitted,

18 Dated: August 30, 2017

MASTAGNI HOLSTEDT, APC

19
20 By: /s/ David E. Mastagni
21 DAVID E. MASTAGNI, ESQ.
22 ISAAC S. STEVENS, ESQ.
23 ACE T. TATE, ESQ.
24 Attorneys for Plaintiffs

25 Dated: August 30, 2017

RENNE SLOAN HOLTZMAN SAKAI, LLP

26 By: /s/ Kevin P. McLaughlin
27 ARTHUR A. HARTINGER
28 KEVIN P. MCLAUGHLIN
Attorneys for Defendant
CITY OF VALLEJO

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

ORDER

Based upon the foregoing, this action is hereby dismissed with prejudice. This order constitutes the Court's judgment and judgment is entered as of the date of this order. The Clerk shall close this file.

IT IS SO ORDERED:

DATED: September 11, 2017.


UNITED STATES DISTRICT JUDGE