

1 MICHELLE R. BARRETT, Bar No. 197280  
 LITTLER MENDELSON, P.C.  
 2 333 Bush Street  
 34th Floor  
 3 San Francisco, CA 94104  
 Telephone: 415.433.1940  
 4 Fax No.: 415.399.8490

5 BARBARA A. BLACKBURN, Bar No. 253731  
 LITTLER MENDELSON, P.C.  
 6 500 Capitol Mall  
 Suite 2000  
 7 Sacramento, CA 95814  
 Telephone: 916.830.7200  
 8 Fax No.: 916.561.0828

9 Attorneys for Defendant  
 TARGET CORPORATION

10 MICHAEL J. TREZZA, Bar No. 142922  
 LAW OFFICE OF MICHAEL J. TREZZA  
 11 506 Second Street  
 12 Yuba City, CA 95991  
 Telephone: (530) 673-5637  
 13 Fax No.: (530) 673-0277

14 Attorney For Plaintiff  
 SALVADOR TINOCO

16 UNITED STATES DISTRICT COURT  
 17 EASTERN DISTRICT OF CALIFORNIA

18 SALVADOR TINOCO,

19 Plaintiff,

20 v.

21 TARGET CORPORATION, AND DOES  
 1 THROUGH 10,

22 Defendant.  
 23

Case No. 2:16-cv-01516-WHO

**JOINT STIPULATION AND [PROPOSED]  
 ORDER FOR DISMISSAL WITH  
 PREJUDICE**

[Fed. R. Civ. P.41(a)(1)]

Judge: William H. Orrick III

1 Plaintiff SALVADOR TINOCO (“Plaintiff”) and Defendant TARGET  
2 CORPORATION (“Defendant”), through their counsel of record, hereby stipulate and agree to the  
3 dismissal with prejudice of this action, *SALVADOR TINOCO v. TARGET CORPORATION*, Case  
4 No. 16-cv-01516-WHO, in its entirety as to all parties and all claims for relief in Plaintiff’s  
5 Complaint pursuant to Federal Rules of Civil Procedure, Rule 41(a)(1)(A)(ii), with each party to  
6 bear its own respective attorneys’ fees and costs.

7 **IT IS SO STIPULATED.**

8 Dated: May 4, 2017

9  
10 /s/ Michael J. Trezza (authorized on 5/3/17)  
11 MICHAEL J. TREZZA  
12 LAW OFFICE OF MICHAEL J. TREZZA  
13 Attorneys for Plaintiff  
14 SALVADOR TINOCO

15 Dated: May 4, 2017

16 /s/ Barbara A. Blackburn  
17 MICHELLE R. BARRETT  
18 BARBARA A. BLACKBURN  
19 LITTLER MENDELSON, P.C.  
20 Attorneys for Defendant  
21 TARGET CORPORATION

22 **IT IS SO ORDERED.**

23 Dated: May 4, 2017, 2017

24   
25 WILLIAM H. ORRICK III  
26 UNITED STATES DISTRICT COURT JUDGE