1 2	DANA A. SUNTAG (State Bar #125127) JOSHUA J. STEVENS (State Bar # 238105) HERUM/CRABTREE/SUNTAG A California Professional Corporation	
3	5757 Pacific Avenue, Suite 222 Stockton, California 95207	
5	Telephone: (209) 472-7700 Facsimile: (209) 472-7986	
6	dsuntag@herumcrabtree.com jstevens@herumcrabtree.com	
7	Attorneys for Defendant	
8	COUNTY OF SAN JOAQUIN	
9	JOHN L. BURRIS ESQ., SBN 69888	
10	BEN NISENBAUM, ESQ., SBN 222173 JAMES COOK, ESQ., SBN 300212	
11	LAW OFFICES OF JOHN L. BURRIS Airport Corporate Centre	
12	7677 Oakport Street, Suite 1120 Oakland, California 94621	
13	Telephone: (510) 839-5200 Facsimile: (510) 839-3882	
14	John.Burris@johnburrislaw.com	
15	Ben.Nisenbaum@johnburrislaw.com James.Cook@johnburrislaw.com	
16	Attorneys for Plaintiff	
17	UNITED STATES DISTRICT COURT	
18 19	FOR THE EASTERN DIST	RICT OF CALIFORNIA
20	SYNETTA MCDANIELS, individually and as	CASE NO.: 2:16-cv-02007-WBS-DB
21	successors-in-interest to Decedent CELESTINE ALLEN,	STIPULATION AND ORDER FOR
22	CELESTINE ALLEIN,	DISMISSAL OF ENTIRE CASE WITH
23	Plaintiff, vs.	PREJUDICE
24	COUNTY OF SAN JOAQUIN, a municipal	[No hearing requested]
25	corporation; and DOES 1-50, inclusive,	
26	Defendants.	



1	RECITALS	
2	A. On March 14, 2017, Plaintiff filed her operative Complaint, naming the	
3	County of San Joaquin as the sole Defendant. (ECF No. 16.)	
4	B. On March 27, 2017, the County of San Joaquin filed an answer to the	
5	Plaintiff's Complaint. (ECF No. 19.)	
6	C. The parties have settled, and Plaintiff now wishes to voluntarily dismiss	
7	the entire action, with prejudice, as part of her settlement with the County of San	
8	Joaquin.	
9	STIPULATION	
10	IT IS STIPULATED AND AGREED, by and between Plaintiff and the County of	
11	San Joaquin, through their undersigned counsel of record, that this entire action be	
12	dismissed with prejudice as to all Defendants, each party to bear their own fees and	
13	costs, including without limitation attorneys' fees, pursuant to Rule 41(a)(2) of the	
14	Federal Rules of Civil Procedure.	
15	Respectfully Submitted,	
16	Dated: July 9, 2018 LAW OFFICES OF JOHN L. BURRIS	
17	By: <u>/s/ Benjamin Nisenbaum</u> Benjamin Nisenbaum	
18	Attorneys for Plaintiff	
19	Dated: July 9, 2018 HERUM\CRABTREE\SUNTAG	
20	Dated: July 9, 2018 HERUM\CRABTREE\SUNTAG A California Professional Corporation	
21	By: <u>/s/ Joshua J. Stevens</u>	
22	JOSHUA J. STEVENS Attorneys for Defendants	
23	/ Morneyo for Bolondario	
24	<u>ORDER</u>	
25	IT IS SO ORDERED.	
26	Dated: July 10, 2018	
	WILLIAM B. SHUBB	



UNITED STATES DISTRICT JUDGE