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Attorneys for Defendants/Counter-Claimants  
DONALD JAMES SHEA, an individual and  
KUNKEL TRUCK LINES, INC., a South Dakota Corporation

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA (SACRAMENTO DIVISION)

TYESHINA SYKES, an individual; and JLS,  
by and through her guardian ad litem  
TYESHINA SYKES, an individual,

Plaintiffs,

vs.

DONALD JAMES SHEA, an individual;  
KUNKEL TRUCK LINES, INC., a South  
Dakota Corporation; and DOES 1-30;

Defendants.

Case No. 2:16-CV-02851-WBS-GGH  
(Unlimited Jurisdiction)

*The Honorable Judge William B. Shubb*

**STIPULATION AND [PROPOSED] ORDER  
OF DISMISSAL WITH PREJUDICE OF THE  
COMPLAINT FILED BY PLAINTIFFS AND  
COUNTER-COMPLAINT FILED BY  
DEFENDANTS**

Action Filed: June 3, 2016

1 AND RELATED ACTIONS.

2  
3 **STIPULATION OF THE PARTIES**

4 Plaintiff/Counter-Defendant Tyeshina Sykes and Plaintiff JLS by and through her guardians ad  
5 litem Tyeshina Sykes and Johnny Nash, through their counsel of record, hereby stipulate that the  
6 complaint against Defendants/Counter-Claimants Donald James Shea and Kunkel Truck Lines, Inc.  
7 may be dismissed with prejudice pursuant to Federal Rules of Civil Procedure 41(a)(1)(A).

8 Defendants/Counter-Claimants Donald James Shea and Kunkel Truck Lines, Inc., through their  
9 counsel of record, hereby stipulate that the counter-complaint against Plaintiff/Counter -Claimant  
10 Tyeshina Sykes may be dismissed with prejudice pursuant to Federal Rules of Civil Procedure 41(a)(2)

11 The Parties further stipulate that the parties shall bear their own attorneys' fees, expenses and  
12 costs.

13  
14 **IT IS SO STIPULATED.**

15 Dated July 16, 2018

BANAFSHEH DANESH & JAVID, PC

16  
17 */s/ Normandy Kidd*

18 By \_\_\_\_\_

19 SHAWN J. McCANN  
20 LAUREN E.S. HORWITZ  
21 NORMANDY KIDD  
22 Attorneys for Plaintiff/Cross-Defendant  
23 TYESHINA SYKES, an individual, and Plaintiff  
24 JLS, by and through her guardian ad litem  
25 TYESHINA SYKES and JOHNNY NASH  
26  
27  
28

1 Dated July 16, 2018

LOW, BALL & LYNCH

3 /s/ Leeh A. DiBello

4 By

J. STEPHANIE KRMPOTIC  
LEE H. A. DIBELLO Attorneys for  
Defendants/Counter-Claimants  
DONALD JAMES SHEA, an individual and  
KUNKEL TRUCK LINES, INC., a South Dakota  
Corporation

9 **PURSUANT TO THE STIPULATION,**

10 **IT IS SO ORDERED.**

12 **Dated: July 18, 2018**



WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE