

1 EUGENE RYU, Bar No. 209104
 2 Email: eryu@littler.com
 3 LITTLER MENDELSON, P.C.
 4 633 West 5th Street, 63rd Floor
 5 Los Angeles, California 90071
 6 Telephone: 213.443.4300
 7 Facsimile: 213.443.4299

8 JEFFREY J. MANN, Bar No. 253440
 9 Email: jmann@littler.com
 10 LITTLER MENDELSON, P.C.
 11 1255 Treat Boulevard, Suite 600
 12 Walnut Creek, California 94597
 13 Telephone: 925.932.2468
 14 Facsimile: 925.946.9809

15 Attorneys for Defendants
 16 REPUBLIC SERVICES, INC.; ALLIED
 17 WASTE SYSTEMS, INC. dba REPUBLIC
 18 SERVICES OF CONTRA COSTA COUNTY;
 19 SOLANO GARBAGE COMPANY

20 Additional Counsel on the following page

21 **UNITED STATES DISTRICT COURT**
 22 **EASTERN DISTRICT OF CALIFORNIA**

23 JIMMY ALEXANDER, individually, and on
 24 behalf of all others similarly situated;

25 Plaintiff,

26 v.

27 REPUBLIC SERVICES, INC., an unknown
 28 corporation; ALLIED WASTE SYSTEMS,
 INC. d.b.a. REPUBLIC SERVICES OF
 CONTRA COSTA COUNTY, an unknown
 corporation; SOLANO GARBAGE
 COMPANY, an unknown corporation, and
 DOES 1 through 50, inclusive;

Defendants.

Case No.: 2:17-CV-00645-WBS-AC

**STIPULATION OF DISMISSAL
 PURSUANT TO FEDERAL RULE OF
 CIVIL PROCEDURE SECTION
 41(A)(1)(A)(II); [PROPOSED] ORDER**

Complaint Filed: February 14, 2017

1 C. ROBERT HARRINGTON, Bar No. 302239

2 Email: rharrington@littler.com

3 LITTLER MENDELSON, P.C.

4 333 Bush Street, 34th Floor

5 San Francisco, California 94104

6 Telephone: 415.433. 1940

7 Facsimile: 415. 399.8490

8 Attorneys for Defendants

9 REPUBLIC SERVICES, INC.; ALLIED

10 WASTE SYSTEMS, INC. dba REPUBLIC

11 SERVICES OF CONTRA COSTA COUNTY;

12 SOLANO GARBAGE COMPANY

13 KENNETH H. YOON, Bar No. 198443

14 Email: kyoon@yoonlaw.com

15 STEPHANIE E. YASUDA, Bar No. 265480

16 Email: syasuda@yoonlaw.com

17 BRIAN G. LEE, Bar No. 300990

18 Email: blee@yoonlaw.com

19 **YOON LAW, APC**

20 One Wilshire Blvd., Suite 2200

21 Los Angeles, California 90017

22 Telephone: 213.612.0988

23 Facsimile: 213. 947.1211

24 DOUGLAS HAN, Bar No. 232858

25 Email: dhan@justicelawcorp.com

26 SHUNT TATAVOS-GHARAJEH, Bar No. 272164

27 Email: statavos@justicelawcorp.com

28 DANIEL J. PARK, Bar No. 274973

29 Email: dpark@justicelawcorp.com

30 **JUSTICE LAW CORPORATION**

31 411 N. Central Avenue, Suite 500

32 Glendale, California 91203

33 Telephone: 818.230.7502

34 Facsimile: 818.230.7259

35 Attorneys for Plaintiff

36 Jimmy Alexander

1 **TO THE HONORABLE COURT:**

2 Plaintiff Jimmy Alexander (“Plaintiff”) and Defendants Republic Services, Inc., Allied
3 Waste Systems, Inc. dba Republic Services of Contra Costa County, Solano Garbage Company
4 (collectively, “Defendants,” and together with Plaintiff, the “Parties”), by and through their
5 respective counsel of record named herein, hereby submit this Stipulation of Dismissal.

6 WHEREAS, on July 7, 2017, Defendants removed Plaintiff’s state court action pending
7 in Solano County Superior Court, based on CAFA jurisdiction;

8 WHEREAS, the Parties have been engaged in meaningful settlement discussions,
9 including participating in a mediation on August 14, 2018; and

10 WHEREAS, the Parties have reached settlement.

11 **NOW, THEREFORE, THE PARTIES, BY AND THROUGH THEIR COUNSEL,**
12 **HEREBY STIPULATE AND AGREE AS FOLLOWS:**

- 13 1. Plaintiff Jimmy Alexander’s individual claims shall be dismissed with prejudice.
- 14 2. Class allegations shall be dismissed without prejudice.
- 15 3. All parties shall assume their own attorneys’ fees and costs.
- 16 4. All parties waive all rights of appeal and/or requests for fees or costs.

17 **IT IS SO STIPULATED.**

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21 **JUSTICE LAW CORPORATION**

LITTLER MENDELSON, P.C.

22
23
24 /s/ Douglas Han
25 Attorneys for Plaintiff
26 JIMMY ALEXANDER

/s/ Jeffery J. Mann
Attorneys for Defendant
REPUBLIC SERVICES, INC.;
ALLIED WASTE SYSTEMS, INC. dba
REPUBLIC SERVICES OF CONTRA
COSTA COUNTY; SOLANO
GARBAGE COMPANY

1 **[PROPOSED] ORDER**

2 Having reviewed and considered the Stipulation of Dismissal Pursuant to Federal Rule
3 of Civil Procedure Section 41(a)(1)(A)(ii), and good cause appearing for same,

4 **IT IS SO ORDERED.**

5
6 Dated: October 3, 2018



7 WILLIAM B. SHUBB
8 UNITED STATES DISTRICT JUDGE