1 2 3 4 5 6 7 8	GOODMAN & ASSOCIATES Karen M. Goodman (SBN 117423) 3840 Watt Avenue, Building A Sacramento, CA 95821 Telephone: (916) 643-0600 Facsimile: (916) 643-0605 E-mail: kgoodman@goodman-law.com E-mail: atang@goodman-law.com  Attorneys for Plaintiff JODELLE KIBBY  Mitchell F. Boomer (State Bar No. 121441 Janelle J. Sahouria (State Barn No. 253699) JACKSON LEWIS P.C. 50 California Street, 9th Floor San Francisco, CA 94111 Telephone: (415) 394-9400			
10	Facsimile: (415) 394-9400  Facsimile: (415) 394-9401  E-mail: boomerm@jacksonlewis.com			
11	E-mail: janelle.sahouria@jacksonlewis.com			
12	PEARSON EDUCATION, INC.			
13	UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA			
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17	JODELLE KIBBY, an individual,	Case No. 2:17-cv-02535-J	AM-GGH	
18	Plaintiff,	JOINT STIPULATION DISMISSAL WITH PRI		
19	V.	State Complaint Filed:	August 23, 2017	
20	PEARSON EDUCATION, and DOES 1 through 50, inclusive,	Removal Filed: Trial Date:	December 1, 2017 None Set	
21	Defendants.			
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24 25	///			
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	Joint Stipulation and Order	1		
	for Dismissal with Prejudice	Case No. 2:17	7-cv-02535-JAM-GGH	

The parties to this action, acting through counsel, and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) hereby stipulate, in consideration of a negotiated settlement executed by them, to the Dismissal with Prejudice of this action, including all claims and counterclaims stated herein against all parties, with each party to bear its own autorney's fees and costs.    Dated: August 20, 2018   GOODMAN & ASSOCIATES						
them, to the Dismissal with Prejudice of this action, including all claims and counterclaims stated herein against all parties, with each party to bear its own attorney's fees and costs.    Dated: August 20, 2018   GOODMAN & ASSOCIATES	1	The parties to this action, acting through counsel, and pursuant to Federal Rule of Civil				
herein against all parties, with each party to bear its own attorney's fees and costs.	2	Procedure 41(a)(1)(A)(ii) hereby stipulate, in consideration of a negotiated settlement executed by				
Dated: August 20, 2018   GOODMAN & ASSOCIATES	3	them, to the Dismissal with Prejudice of this action, including all claims and counterclaims stated				
Dated: August 20, 2018   GOODMAN & ASSOCIATES	4	herein against all parties, with each party to bear its own attorney's fees and costs.				
Dated: August 20, 2018   GOODMAN & ASSOCIATES	5					
By: s/Karen M. Goodman   Karen M. Goodman   Karen M. Goodman (SBN 117423)   Attorneys for Plaintiff   JODELLE KIBBY	6					
By: s/Karen M. Goodman   Karen M. Goodman   Karen M. Goodman   Karen M. Goodman   SBN 117423   Attorneys for Plaintiff   JODELLE KIBBY	7	Dated: August 20, 2018		GOODMAN & ASSOCIATES		
10	8					
Attorneys for Plaintiff JODELLE KIBBY  Dated: September 5, 2018  Dated: September 5, 2018  By: SMitchell F. Boomer Mitchell F. Boomer (SBN 121441) Janelle J. Sahouria (SBN 253699) Attorneys for Defendant PEARSON EDUCATION, INC.  PEARSON EDUCATION, INC.  Joint Stipulation and Order	9		By:	s/Karen M. Goodman		
Dated: September 5, 2018  Dated: September 5, 2018  By: SMitchell F. Boomer Mitchell F. Boomer (SBN 121441) Janelle J. Sahouria (SBN 253699) Attorneys for Defendant PEARSON EDUCATION, INC.  PEARSON EDUCATION, INC.  Joint Stipulation and Order	10			Attorneys for Plaintiff		
Dated: September 5, 2018   JACKSON LEWIS P.C.	11			JODELLE KIBBY		
By: s/Mitchell F. Boomer (SBN 121441) Janelle J. Sahouria (SBN 253699) Attorneys for Defendant PEARSON EDUCATION, INC.  17 18 19 20 21 22 23 24 25 26 27 28 Joint Stipulation and Order	12	Data de Cantamban 5, 2019		LACUCON LEWIC D.C.		
15   Mitchell F. Boomer (SBN 121441)   Janelle J. Sahouria (SBN 253699)   Attorneys for Defendant   PEARSON EDUCATION, INC.   17   18   19   20   21   22   23   24   25   26   27   28	13	Dated: September 5, 2018		JACKSON LEWIS P.C.		
Janelle J. Sahouria (SBN 253699) Attorneys for Defendant PEARSON EDUCATION, INC.  17 18 19 20 21 22 23 24 25 26 27 28 Joint Stipulation and Order	14		By:	s/Mitchell F. Boomer Mitchell F. Boomer (SBN 121441)		
PEARSON EDUCATION, INC.  PEARSON EDUCATION, INC.  PEARSON EDUCATION, INC.  PEARSON EDUCATION, INC.  17  18  19  20  21  22  23  24  25  26  27  28  Joint Stipulation and Order	15			Janelle J. Sahouria (SBN 253699)		
18 19 20 21 22 23 24 25 26 27 28  Joint Stipulation and Order	16			PEARSON EDUCATION, INC.		
19 20 21 22 23 24 25 26 27 28  Joint Stipulation and Order						
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				Case No. 2:17-cv-02535-JAM-GGH		

1	<u>ORDER</u>		
2	The stipulation is approved. The entire action, including all claims and counterclaims stated		
3	herein against all parties, is hereby dismissed with prejudice.		
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5	DATED: September 5, 2018		
6		/s/ John A. Mendez	
7		United States District Court Judge	
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	Joint Stipulation and Order for Dismissal with Prejudice	Case No. 2:17-cv-02535-JAM-GGH	