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6 Attorneys for Defendant  
G & B GROCERS dba RANCHO CORDOVA  
7 GROCERY OUTLET [*erroneously sued as G & B GROCERS*  
*doing business as Grocery Outlet*]

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12 Attorneys for Plaintiff MAURSHAE SMITH, on behalf of  
herself and all others similarly situated

13  
14 UNITED STATES DISTRICT COURT  
15 EASTERN DISTRICT OF CALIFORNIA  
16

17 MAURSHAE SMITH, on behalf of herself and  
all others similarly situated,

18 Plaintiff,

19 v.

20 G & B GROCERS, a California corporation,  
21 doing business as Grocery Outlet, and DOES 1-  
10,

22 Defendants.  
23

Case No: 2:21cv-01504-MCE-AC

**JOINT STIPULATION FOR DISMISSAL  
WITH PREJUDICE OF ALL CLAIMS;  
ORDER**

Complaint Filed: August 22, 2021  
Trial Date: None Set

1 Plaintiff MAURSHAE SMITH (“Plaintiff”), Defendant G & B GROCERS dba RANCHO  
2 CORDOVA GROCERY OUTLET [*erroneously sued as G & B GROCERS doing business as Grocery*  
3 *Outlet*] (“Defendant”) (collectively “the Parties”), by and through their counsel of record, hereby  
4 stipulate under Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure that this entire action be  
5 dismissed with prejudice.

6 **RECITALS**

7 WHEREAS, on August 22, 2021, Plaintiff filed the action styled *Maushae Smith v. G & B*  
8 *GROCERS, a California corporation, doing business as Grocery Outlet, and DOES 1-10*, in United  
9 States District Court Eastern District of California, Case No. 2:21cv-01504-MCE-AC;

10 WHEREAS, the Parties have agreed to resolve the action through a Settlement Agreement and  
11 General Release, fully executed on November 16, 2023 (the “Agreement”); and

12 WHEREAS, the Parties seek dismissal of this entire action and all claims with prejudice to  
13 comply with the Agreement.

14 **STIPULATION**

15 NOW THEREFORE, IT IS HEREBY STIPULATED by the Parties, pursuant to Rule  
16 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, as follows:

17 1. The action, and all claims therein, is dismissed with prejudice as to Plaintiff Maurshae  
18 Smith, in its entirety, and without prejudice to the remaining aggrieved employees, if any; and

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1           2.       Each party shall bear its and/or her own respective attorneys' fees and costs.  
2           IT IS SO STIPULATED.

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4 Dated: February 5, 2024

FISHER & PHILLIPS LLP

5  
6 By: /s/ Christopher S. Alvarez

Alden J. Parker

7 Christopher S. Alvarez

8 Attorneys for Defendant

G & B GROCERS dba RANCHO CORDOVA

9 GROCERY OUTLET [*erroneously sued as*

10 *G & B GROCERS doing business as*

*Grocery Outlet*]

11  
12 DATE: February 5, 2024

NUNES WORKER RIGHTS LAW, APC

13  
14 By: /s/ Anthony J. Nunes [as authorized on 2.5.24]

15 Anthony J. Nunes

16 Attorneys for Plaintiff

17 MAURSHAE SMITH  
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**ORDER**

Pursuant to stipulation of the Parties, and for good cause shown, the above-captioned action shall be dismissed with prejudice, as to Plaintiff Maurshae Smith, in its entirety, and without prejudice to the remaining aggrieved employees, if any, as to all claims brought by Plaintiff against all Defendants.

IT IS SO ORDERED.

Dated: February 6, 2024

  
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MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE

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