

1 **SPINELLI, DONALD & NOTT**
 A Professional Corporation
 2 ROSS R. NOTT, (State Bar No. 172235)
 300 University Avenue, Suite 100
 3 Sacramento, CA 95825
 Telephone: (916) 448-7888
 4 Facsimile: (916) 448-6888

5 Attorneys for Defendant and Cross-Defendant
 WOODSTREAM CORPORATION

6
 7 UNITED STATES DISTRICT COURT
 8 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION
 9

10 CSAA INSURANCE EXCHANGE,

Case No.: 2:23-cv-01156-DJC-DMC

11 Plaintiffs,
 12 vs.

**STIPULATION OF DISMISSAL
 WITH PREJUDICE AND ORDER**

13 DYNAMIC SOLUTIONS WORLDWIDE,
 LLC, WOODSTREAM CORPORATION,
 14 COSTCO WHOLESALE CORPORATON
 and DOES 1 to 20,

Complaint Filed Butte County Superior
 Court: May 15, 2023

15 Defendants.

16 COSTCO WHOLESALE CORPORATION,

17 Cross-Claimant,
 18 vs.

19 DYNAMIC SOLUTIONS WORLDWIDE,
 LLC, WOODSTREAM CORPORATION,
 and ROES 1-23, inclusive,

20 Cross-Defendants.
 21

22 Pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, and for good
 23 cause stated herein, the parties stipulate that the Complaint of CSAA Insurance Exchange brought
 24 as to Defendants identified as Dynamic Solutions Worldwide, LLC, Woodstream Corporation, and
 25 Costco Wholesale Corporation shall be dismissed by the Court, with prejudice. As between
 26 Plaintiff and Defendants, they shall bear their own costs and fees associated with this matter
 27 including attorney's fees.
 28

1 As to the cross-claim of Costco Wholesale Corporation against Dynamic Solutions,
2 Worldwide, LLC, and Woodstream Corporation, that action shall be subject to a separate dismissal
3 as those parties are resolving defense and indemnity obligations between themselves.

4 **IT IS SO STIPULATED.**

5 DATED: 5/9/24

THE GRUNSKY LAW FIRM

7 /s/Robert E. Wall

8 Robert E. Wall

9 Attorneys for Plaintiff,
CSAA INSURANCE EXCHANGE

10 DATED: 5/8/24

MAIRE & DEEDON

11 /s/Patrick L. Deedon

12 Patrick L. Deedon

13 Attorneys for Defendant/Cross-Claimant,
COSTCO WHOLESALE CORPORATION

14 DATED: 5/9/24

SPINELLI, DONALD & NOTT

16 /s/Ross R. Nott

17 Ross R. Nott

18 Attorneys for Defendant,
WOODSTREAM CORPORATION

19 **ORDER**

20 It is hereby ordered that Plaintiff CSAA Insurance Exchange's Complaint as to Dynamic
21 Solutions Worldwide, LLC, Woodstream Corporation, and Costco Wholesale Corporation as well
22 as all Does identified therein shall be and are dismissed with prejudice pursuant to the terms set
23 forth herein.

24 **IT IS SO ORDERED.**

25 Dated: May 10, 2024

26 /s/ Daniel J. Calabretta

27 THE HONORABLE DANIEL J. CALABRETTA
28 UNITED STATES DISTRICT JUDGE