

1 RISHI N. SHARMA (Cal. State Bar No. 239034)  
 PETER A. COOPER (Cal. State Bar No. 275300)  
 2 PAUL HASTINGS LLP  
 55 Second Street, 24th Floor  
 3 San Francisco, California 94105  
 Telephone: (415) 856-7000  
 4 Facsimile: (415) 856-7100  
[rishisharma@paulhastings.com](mailto:rishisharma@paulhastings.com)  
 5 [petercooper@paulhastings.com](mailto:petercooper@paulhastings.com)

6 Attorneys for Plaintiff  
 Paul A. Redd, Jr.

7  
 8 KAMALA D. HARRIS  
 Attorney General of California  
 DANIELLE F. O'BANNON  
 9 Supervising Deputy Attorney General  
 TRACE O. MAIORINO  
 10 Deputy Attorney General  
 SHARON A. GARSKE  
 11 Deputy Attorney General  
 State Bar No. 215167  
 12 455 Golden Gate Avenue, Suite 11000  
 San Francisco, CA 94102-7004  
 13 Telephone: (415) 703-5975  
 Fax: (415) 703-5843  
 14 E-mail: [Sharon.Garske@doj.ca.gov](mailto:Sharon.Garske@doj.ca.gov)

15 Attorneys for Defendant  
 Michael D. Daley

17 IN THE UNITED STATES DISTRICT COURT  
 18 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 19 SAN FRANCISCO DIVISION

21 **PAUL A. REDD, JR.,**

22 Plaintiff,

23 v.

25 **STEVEN CAMBRA, JR., et al.,**

26 Defendants.

C-98-20429 EMC

**STIPULATION OF VOLUNTARY  
 DISMISSAL WITHOUT PREJUDICE;  
 PROPOSED ORDER**

Judge: Honorable Edward M. Chen  
 Trial Date: June 15, 2015

1 Plaintiff Paul A. Redd and Defendant Michael D. Daley have resolved this case in its  
2 entirety. Each party shall bear its own litigation costs and attorney's fees.

3 The parties jointly request that the Court vacate all deadlines and the June 15, 2015 trial  
4 date. The parties will file a dismissal with prejudice upon finalizing the settlement agreement and  
5 release and payment of the settlement monies.

6 The parties stipulate to a dismissal of this action without prejudice under Federal Rule of  
7 Civil Procedure 41(a)(1)(A)(ii).

8 IT IS SO STIPULATED.

9  
10 Dated: February 26, 2015

PAUL HASTINGS LLP

11 By: /s/RISHI N. SHARMA  
12 RISHI N. SHARMA  
13 PETER A. COOPER  
14 *Attorneys for Plaintiff Paul A. Redd*

15 Dated: February 26, 2015

KAMALA D. HARRIS  
Attorney General of The State of California

17 By: /s/SHARON A. GARSKE  
18 TRACE O. MAIORINO  
19 SHARON A. GARSKE  
20 Deputy Attorney General  
21 *Attorneys for Defendant Michael D. Daley*

### ORDER

22 In accordance with the parties stipulation, this action is dismissed without prejudice. All  
23 deadlines, including the June 15, 2015 trial date are vacated. The parties will file a dismissal with  
24 prejudice upon finalizing the settlement agreement and release and payment of the settlement  
25 monies. The Clerk shall close the file.

26 **IT IS SO ORDERED.**

27 Dated: 3/2/15



**CERTIFICATE OF SERVICE**

Case Name: Redd v. Cambra, et al. No. C-98-20429 EMC

I hereby certify that on February 27, 2015, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**STIPULATION OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE; PROPOSED ORDER**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on February 27, 2015, at San Francisco, California.

D. Criswell  
Declarant

s/ D. Criswell  
Signature