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5 Attorneys for Plaintiffs
6 CRAIG YATES
and DISABILITY RIGHTS
7 ENFORCEMENT, EDUCATION,
SERVICES: HELPING YOU
8 HELP OTHERS

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 CRAIG YATES, an individual; and)
DISABILITY RIGHTS, ENFORCEMENT,)
12 EDUCATION, SERVICES: HELPING)
YOU HELP OTHERS, a California public)
13 benefit corporation,)
14 Plaintiffs,)
15 v.)
16 RICCARDO'S RISTORANTE E)
PIZZERIA; CONSIGLIA CRISPI;)
17 RICHARD CRISPI; and ALILAM, LLC,)
18 Defendants.)

CASE NO. CV-09-2057-RS
STIPULATION OF DISMISSAL AND
[PROPOSED] ORDER THEREON
RS

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20 The parties, by and through their respective counsel, stipulate to dismissal of this action in
21 its entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(1). Outside of the terms of the
22 Settlement Agreement and General Release ("Agreement") herein, each party is to bear its own
23 costs and attorneys' fees. The parties further consent to and request that the Court retain
24 jurisdiction over enforcement of the Agreement. See Kokonen v. Guardian Life Ins. Co., 511 U.S.
25 375 (1994) (empowering the district courts to retain jurisdiction over enforcement of settlement
26 agreements).

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1 Therefore, IT IS HEREBY STIPULATED by and between parties to this action through
2 their designated counsel that the above-captioned action be and hereby is dismissed with prejudice
3 pursuant to Federal Rules of Civil Procedure section 41(a)(1).

4 This stipulation may be executed in counterparts, all of which together shall constitute one
5 original document.


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7 Dated: April 26, 2010

THOMAS E. FRANKOVICH, Esq.
A PROFESSIONAL LAW CORPORATION

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9 By: /s/Thomas E. Frankovich
Thomas E. Frankovich
10 Attorneys for CRAIG YATES and
11 DISABILITY RIGHTS ENFORCEMENT,
12 EDUCATION SERVICES:HELPING YOU HELP
OTHERS

13 Dated: May 13, 2010

NATASHA GORDON, Esq.
THE CRONIN LAW GROUP

14
15 By: 
16 NATASHA GORDON
17 Attorneys for Defendant ALILAM, LLC

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1 Dated: _____, 2010

ANDREW DIMITRIOU Esq.
DIMITRIOU & ASSOCIATES, P.C.

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3
4 By: _____

Andrew Dimitriou

Attorneys for Defendants CONSIGLIA CRISPI and
RICHARD CRISPI

7 **ORDER**

8 **IT IS HEREBY ORDERED** that this matter is dismissed with prejudice pursuant to
9 Fed.R.Civ.P.41(a)(1). **IT IS FURTHER ORDERED** that the Court shall retain jurisdiction for the
10 purpose of enforcing the parties' Settlement Agreement and General Release should such
11 enforcement be necessary,
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14 Dated: 5/20/, 2010

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Honorable Richard Seeborg
United State District Judge
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