

1 TIMOTHY P. MURPHY, ESQ. (120920)
 2 DOLORES M. DONOHOE, ESQ. (111432)
 3 EDRINGTON, SCHIRMER & MURPHY LLP
 4 2300 Contra Costa Boulevard, Suite 450
 Pleasant Hill, CA 94523-3936
 Telephone: (925) 827-3300
 Facsimile: (925) 827-3320

5 Attorneys for Defendants WEST CONTRA COSTA
 6 UNIFIED SCHOOL DISTRICT, ROXANNE BROWN-GARCIA,
 and MARKELL McCAIN

7 UNITED STATES DISTRICT COURT
 8 NORTHERN DISTRICT OF CALIFORNIA
 9

10 KIESHA WATERS,
 11 Plaintiff,

12 vs.

13 WEST CONTRA COSTA UNIFIED SCHOOL
 14 DISTRICT, ROXANNE BROWN-GARCIA
 15 and MARKELL McCAIN,
 16 Defendants.

CASE NO.: CV09-5776 VRW

**STIPULATION FOR ENTRY OF ORDER
 OF DISMISSAL AND ~~PROPOSED~~
 ORDER**

17 WHEREAS all parties to this action, namely, Plaintiff Kiesha Waters and
 18 Defendants West Contra Costa Unified School District, Roxanne Brown-Garcia and
 19 Markell McCain (the "Settling Parties"), have reached a mutual and amicable settlement
 20 and have entered into a separate agreement for settlement of this action, the terms of which
 21 are set forth in writing in the "Settlement Agreement and Full and Final Release of all
 22 Claims" ("the Settlement Agreement"), to fully and finally resolve all matters concerning
 23 the Settling Parties without trial;

24 WHEREAS the Settlement Agreement covers all the claims between the Settling
 25 Parties in this action;

26 WHEREAS the Settling Parties agree to pay their own attorney fees and costs;

27 WHEREAS there are no further issues for the Court to resolve as between the
 28 Settling Parties; and

1 WHEREAS the Settling Parties have agreed that the Court should retain jurisdiction
2 for the purpose of enforcing the terms of the Settlement Agreement,

3 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS
4 FOLLOWS:

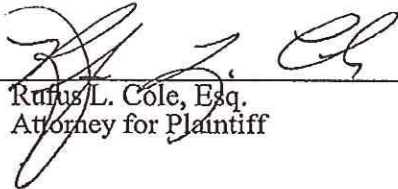
5 1. This action, including each of Plaintiff's causes of action set out in Plaintiff's
6 Complaint against all named defendants, shall be dismissed with prejudice, with each party
7 to bear its own attorney fees and costs.

8 2. The Court shall retain jurisdiction to enforce the terms of the Settling Parties'
9 Settlement Agreement.

10 SO STIPULATED.


11 Dated: ~~July~~ ^{August} 4, 2010

RUFUS L. COLE & ASSOCIATES

12
13 By 
14 Rufus L. Cole, Esq.
15 Attorney for Plaintiff

16 Dated: ~~July~~ ^{August} 10, 2010

EDRINGTON, SCHIRMER & MURPHY

17
18 By 
19 Timothy P. Murphy, Esq.
20 Attorney for Defendants, WEST CONTRA
21 COSTA UNIFIED SCHOOL DISTRICT,
22 ROXANNE BROWN-GARCIA and
23 MARKELL McCAIN

24 PURSUANT TO STIPULATION, IT IS SO ORDERED.

25 Dated: 8/13/2010

26 Chief Judge 
27 UNITED STATES DISTRICT COURT
28 NORTHERN DISTRICT OF CALIFORNIA