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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
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11  
12 Case No. C10-04155 MEJ

13 **FRED DOYLE HARDEN,**

14 Plaintiff,

15 v.

16 **CITY OF CLAYTON; DAN LAWRENCE,**  
17 **CHIEF OF POLICE OF THE CITY OF**  
18 **CLAYTON; CLAYTON POLICE**  
19 **OFFICER R. ENEA; CLAYTON POLICE**  
20 **SERGEANT CRAIN; CLAYTON POLICE**  
21 **SERGEANTS DOES ONE THROUGH**  
22 **TEN; CLAYTON POLICE OFFICERS**  
23 **DOES ELEVEN THROUGH 20; TERRY**  
24 **ELM; STATE OF CALIFORNIA**  
25 **DEPARTMENT OF JUSTICE**  
26 **EMPLOYEES DOES TWENTY ONE**  
27 **THROUGH THIRTY,**

28 Defendants.

**STIPULATION TO GOOD FAITH  
SETTLEMENT BETWEEN PLAINTIFF  
FRED DOYLE HARDEN AND  
DEFENDANT TERRY ELM;  
STIPULATION AND (Proposed) ORDER  
OF DISMISSAL OF DEFENDANT TERRY  
ELM**

24 THE PARTIES HEREBY STIPULATE to the settlement entered into between Plaintiff  
25 Fred Doyle Harden and Defendant Terry Elm, as set forth in the Full and Final Release attached  
26 hereto as Exhibit A.

27 THE PARTIES FURTHER STIPULATE that the settlement between Plaintiff Fred Doyle  
28 Harden and Defendant Terry Elm is made in good faith pursuant to California Code of Civil

1 Procedure section 877.


2 THE PARTIES FURTHER STIPULATE that this action in its entirety be DISMISSED,  
3 with prejudice, as against Defendant Terry Elm.

4 SO STIPULATED.

5 Dated: \_\_\_\_\_  
6

\_\_\_\_\_  
J. MICHAEL BROWN, Esq.  
Attorney for Plaintiff Fred Doyle Harden

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9 Dated: 5/10/12 \_\_\_\_\_

  
\_\_\_\_\_  
WIL FONG, Deputy Attorney General  
Attorney for Defendant Terry Elm

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12 Dated: \_\_\_\_\_

\_\_\_\_\_  
NOAH G. BLECHMAN  
Attorney for Defendant Terry Elm

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15 SO ORDERED.

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17 Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. MARIA-ELENA JAMES  
Chief United States Magistrate Judge

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Procedure section 877.

THE PARTIES FURTHER STIPULATE that this action in its entirety be DISMISSED,  
with prejudice, as against Defendant Terry Elm.

SO STIPULATED.

Dated: April 19, 2012

  
\_\_\_\_\_  
J. MICHAEL BROWN, Esq.  
Attorney for Plaintiff Fred Doyle Harden

Dated: \_\_\_\_\_

\_\_\_\_\_  
WIL FONG, Deputy Attorney General  
Attorney for Defendant Terry Elm

Dated: \_\_\_\_\_

\_\_\_\_\_  
NOAH G. BLECHMAN  
Attorney for Defendant Terry Elm

SO ORDERED.

Dated: May 11, 2012

  
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HON. MARIA-ELENA JAMES  
Chief United States Magistrate Judge

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