

1 MELINDA HAAG (CABN 132612)
 United States Attorney
 2 THOMAS MOORE (ASBN 4305-O78T)
 Assistant United States Attorney
 3 Chief, Tax Division
 CYNTHIA STIER (DCBN 423256)
 4 Assistant United States Attorney
 11th Floor Federal Building
 5 450 Golden Gate Avenue, Box 36055
 San Francisco, California 94102
 6 Telephone: (415) 436-7000

7 Attorneys for the United States of America

8
 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

12 STEVEN A. GRAY,)	Case No. CV 11-0680 SC
)	
13 Plaintiff,)	STIPULATION FOR DISMISSAL AND
)	<u>PROPOSED</u> ORDER
14 v.)	
)	
15 UNITED STATES OF AMERICA,)	
)	
16 Defendant.)	
17)	
18 UNITED STATES OF AMERICA,)	
)	
19 Counter-claimant,)	
)	
20 v.)	
)	
21 MANUEL MARTINEZ and STEVEN)	
22 A. GRAY,)	
)	
23 Counter-defendants.)	

24 IT IS HEREBY STIPULATED AND AGREED AND RESPECTFULLY REQUESTED
 25 by and between the Plaintiff, Steven A. Gray, and Defendant, United States of America, as
 26 reflected by the signatures of their respective counsel as set forth below:

27 1. That Plaintiff, Steven A. Gray and the United States have entered into a settlement on
 28 March 23, 2012.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Upon the stipulation of Plaintiff, Steven A. Gray, and Defendant, United States of America, and pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, it is HEREBY ORDERED, ADJUDGED and DECREED that this action is hereby dismissed with prejudice, provided however, that if either party notifies this Court on or before April 23, 2012, that the settlement has not been consummated, then this order shall stand vacated and this case shall forthwith be restored to the calender and a case management conference scheduled.

IT IS FURTHER ORDERED that this Court retains jurisdiction over this matter for the purpose of enforcing the terms of the settlement, including entry of judgment, if necessary. See Kokonen v. Guardian Life Ins. of America, 511 U.S. 375 (1994).

ORDERED this 26 day of March, 2012, at San Francisco, California.



Gray v. US
Case Nos. CV 11-0680-SC
Stip. Of Dismissal and ~~proposed~~
Order