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 and IRMA RAMIREZ, each an individual,  
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 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

10 DAREN HEATHERLY and IRMA )  
 11 RAMIREZ, each an individual, )  
 12 Plaintiffs, )  
 13 )  
 14 v. )  
 15 LA PALOMA RESTAURANT; HANG )  
 16 LIM and KIM SHU LIM, TRUSTEES OF )  
 THE HANG and KIM SHU LIM 1992 )  
 17 FAMILY TRUST, )  
 18 Defendants. )  
 19 \_\_\_\_\_ )  
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**CASE NO. CV-11-0806-MEJ**

**STIPULATION OF DISMISSAL AND  
 [PROPOSED] ORDER THEREON**

21 The parties, by and through their respective counsel, stipulate to dismissal of this action  
 22 in its entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(2). Outside of the terms of the  
 23 Settlement Agreement and General Release (“Agreement”) herein, each party is to bear its own  
 24 costs and attorneys’ fees. The parties further consent to and request that the Court retain  
 25 jurisdiction over enforcement of the Agreement. *See Kokonen v. Guardian Life Ins. Co.*, 511  
 26 U.S. 375 (1994) (empowering the district courts to retain jurisdiction over enforcement of  
 27 settlement agreements).  
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