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5 Attorneys for Plaintiffs IRMA RAMIREZ and DAREN HEATHERLY,
 each an individual;

7 UNITED STATES DISTRICT COURT
 8 NORTHERN DISTRICT OF CALIFORNIA

9 IRMA RAMIREZ and DAREN)
 HEATHERLY,)
 10 Plaintiffs,)
 11 v.)
 12)
 13 PERRY’S DELICATESSEN #10; ROBERT)
 COCHRAN; and DONNA COCHRAN,)
 14 Defendants.)
 15

CASE NO. CV-11-1372-JCS
STIPULATION OF DISMISSAL AND
~~PROPOSED~~ ORDER THEREON

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

24 Therefore, IT IS HEREBY STIPULATED by and between parties to this action through
 25 their designated counsel that the above-captioned action be and hereby is dismissed with prejudice

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1 pursuant to Federal Rules of Civil Procedure section 41(a)(1).

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

4
5 Dated: September 21, 2011

THOMAS E. FRANKOVICH
A PROFESSIONAL LAW CORPORATION

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8 By: /s/ Thomas E. Frankovich
Thomas E. Frankovich
9 Attorney for Plaintiffs IRMA RAMIREZ and
DAREN HEATHERLY, each an individual

10
11 Dated: _____, 2011

ROBERT COCHRAN, In Pro Per

12
13 By: _____
14 ROBERT COCHRAN, In Pro Per

15 Dated: _____, 2011

DONNA COCHRAN, In Pro Per

16
17 By: _____
18 DONNA COCHRAN, In Pro Per

19
20 **ORDER**

21 IT IS HEREBY ORDERED that this matter is dismissed with prejudice pursuant to
22 Fed.R.Civ.P.41(a)(1). IT IS FURTHER ORDERED that the Court shall retain jurisdiction for the
23 purpose of enforcing the parties' Settlement Agreement and General Release for three years.

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25
26 Dated: October 5, 2011.



William Alsup
UNITED STATES DISTRICT JUDGE

1 pursuant to Federal Rules of Civil Procedure section 41(a)(1).

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

4
5 Dated: _____, 2011

THOMAS E. FRANKOVICH
A PROFESSIONAL LAW CORPORATION

6
7
8 By: _____
9 Thomas E. Frankovich
10 Attorney for Plaintiffs IRMA RAMIREZ and
11 DAREN HEATHERLY, each an individual

12
13 Dated: Sept 21, 2011

ROBERT COCHRAN, In Pro Per

14
15 By: Robert Cochran
16 ROBERT COCHRAN, In Pro Per

17
18 Dated: Sept. 21, 2011

DONNA COCHRAN, In Pro Per

19
20 By: Donna Cochran
21 DONNA COCHRAN, In Pro Per
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