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IN THE UNITED STATES DISTRICT COURT
 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 WALTER DELSON,
 12 Plaintiff,

CASE NO. C11-03781 MEJ
Civil Rights

13 v.

**STIPULATION AND ~~[PROPOSED]~~
 ORDER FOR DISMISSAL WITH
 PREJUDICE**

14 CYCT MANAGEMENT GROUP,
 15 INC.; KINGS TRIUMPH, LLC;
 16 LINDA YU- LING TU TRUST;
 17 LALEH HERAVI dba Fondue Fred;
 18 and DOES 1-20, Inclusive,

Pursuant to FRCP Rule 41(a)(2)

19 Defendants.
 20 _____/

21 Plaintiff WALTER DELSON and Defendants CYCT MANAGEMENT
 22 GROUP, INC., KINGS TRIUMPH, LLC, and the LINDA YU- LING TU TRUST
 23 hereby jointly stipulate and request through their respective attorneys of record
 24 that the Court dismiss this case with prejudice pursuant to FRCP 41(a)(2). This
 25 request and stipulation is based on the following good cause:

- 26 1. Whereas the only remaining issue in this case is payment of plaintiff's
 27 attorney fees in the amount of \$81,851.50 as Ordered by the Court on April
 28 30, 2013 (Docket no. 45);
2. Whereas defendants CYCT Management Group, Inc., King's Triumph,
 LLC, and Linda Lu-Ling Tu Trust have now paid this amount in full;

1 3. Whereas the parties have agreed to injunctive relief for barrier removal
2 pursuant to the Consent Decree entered on June 11, 2012, (Docket no 21),
3 and under which this Court will continue to have jurisdiction to enforce its
4 provisions;

5 4. The parties therefore jointly stipulate and request that the Court grant a
6 dismissal of CYCT MANAGEMENT GROUP, INC., KINGS TRIUMPH,
7 LLC, and the LINDA YU- LING TU TRUST with prejudice without
8 entering judgment against defendants.

9 IT IS SO STIPULATED.

10
11 Dated: June 18, 2013

LAW OFFICES OF PAUL L. REIN

12
13 By /s/Paul L. Rein
14 PAUL L. REIN
15 Attorneys for Plaintiff
WALTER DELSON

16 Dated: June 18, 2013

LOW BALL & LYNCH

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18 /s/Laura Flynn
19 By LAURA FLYNN, Esq.
20 Attorneys for Defendants
21 CYCT MANAGEMENT GROUP, INC.;
22 KINGS TRIUMPH, LLC; and LINDA YU-
23 LING TU TRUST
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ORDER

Good cause having been shown, this case is dismissed with prejudice pursuant to FRCP 41(a)(2) as to defendants CYCT MANAGEMENT GROUP, INC.; KINGS TRIUMPH, LLC; and LINDA YU- LING TU TRUST.

IT IS SO ORDERED.

Dated: June 20, 2013



MARIA ELENA JAMES
United States Chief Magistrate Judge