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9 **Attorneys for Plaintiff**
10 **Innovative Sports Management, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 **Innovative Sports Management, Inc.,**

14 **Plaintiff,**

15 **vs.**

16 **Salvador M. Lopez, et al.,**

17 **Defendant.**

18 **CASE NO. 3:11-cv-3817-EMC**

19 **STIPULATION OF DISMISSAL OF**
20 **PLAINTIFF'S COMPLAINT AGAINST**
21 **DEFENDANT SALVADOR M. LOPEZ,**
22 **individually and d/b/a EL FAROLITO**

23 **IT IS HEREBY STIPULATED** by and between Plaintiff INNOVATIVE SPORTS
24 MANAGEMENT, INC. and Defendant SALVADOR M. LOPEZ, individually and d/b/a EL
25 FAROLITO, that the above-entitled action is hereby dismissed **without prejudice** against
26 SALVADOR M. LOPEZ, individually and d/b/a EL FAROLITO, and subject to the Court's
27 jurisdiction to enforce the settlement agreement reached between the Parties.

28 **IT IS FURTHER STIPULATED** that provided no Party referenced above has filed a
motion to reopen this action by December 28, 2012, the dismissal shall be deemed to be **with**
prejudice.

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This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1). Each Party referenced-above shall bear its own attorneys' fees and costs.

Dated: September 21, 2012



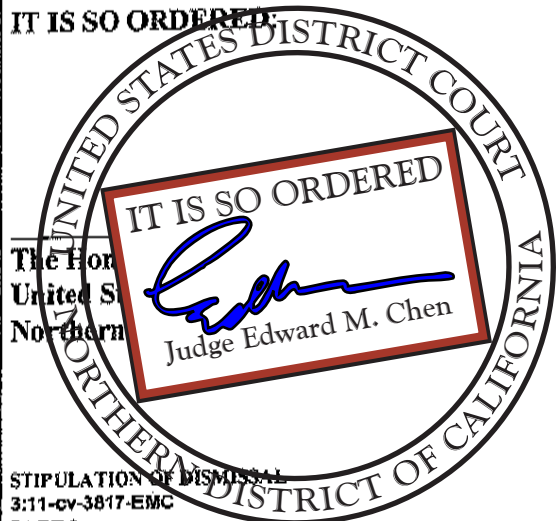
LAW OFFICES OF THOMAS P. RILEY, P.C.
By: Thomas P. Riley
Attorneys for Plaintiff
INNOVATIVE SPORTS MANAGEMENT, INC.

Dated: 9/25/2012



BRISCOE IVESTER & BAZEL, LLP
By: Richard J. Wallace
Attorneys for Defendant
SALVADOR M. LOPEZ, individually and d/b/a
EL FAROLITO

IT IS SO ORDERED



11/14/12

Dated: _____

1 **PROOF OF SERVICE (SERVICE BY E-MAIL)**

2
3 I declare that:

4
5 I am employed in the County of Los Angeles, California. I am over the age of eighteen years
6 and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue,
7 South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and
8 processing of correspondence/documents for mail in the ordinary course of business.

9
10 On October 1, 2012, I served:


11 **STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT AGAINST**
12 **DEFENDANT SALVADOR M. LOPEZ, individually and d/b/a EL FAROLITO**

13 On all parties in said cause by emailing same to the Defendants' counsel at the following e-mail
14 addresses:

15 Richard Jonathon Wallace, Esquire (Attorneys for Defendants)
16 **BRISCOE IVESTER & BAZEL, LLP**
17 155 Sansome Street, 7th Floor
18 San Francisco, CA 94104
19 e-mail: rwallace@briscolaw.net

20 I declare under the penalty of perjury pursuant to the laws of the United States that the
21 foregoing is true and correct and that this declaration was executed on October 1, 2012, at South
22 Pasadena, California.

23 Dated: October 1, 2012

24 
25 _____
26 MARIA BAIRD

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