

1 Erik L. Peterson, Esq. (SBN 156189)
2 Bostwick & Peterson, LLP
3 Four Embarcadero Center, Suite 750
4 San Francisco, CA 94111
5 Telephone: (415) 421-8300

6 Attorney for Plaintiffs
7 YVONNE BROWN and BARRY BROWN

8 MELINDA HAAG (CSBN 132612)
9 United States Attorney
10 JOANN M. SWANSON (CSBN 88143)
11 Chief, Civil Division
12 NEILL T. TSENG (CSBN 220348)
13 Assistant United States Attorney

14 450 Golden Gate Avenue, Box 36055
15 San Francisco, California 94102-3495
16 Telephone: (415) 436-7155
17 FAX: (415) 436-6927
18 neill.tseng@usdoj.gov

19 Attorneys for Defendant
20 UNITED STATES OF AMERICA

21 UNITED STATES DISTRICT COURT
22 NORTHERN DISTRICT OF CALIFORNIA
23 SAN FRANCISCO DIVISION

24 YVONNE BROWN, et al., } No. C 11-3879 SC
25 Plaintiffs, }
26 v. }
27 UNITED STATES OF AMERICA, }
28 Defendant. }
29

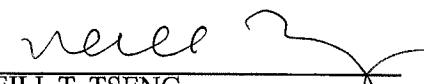
30 STIPULATION TO DISMISS
31 COMPLAINT WITHOUT PREJUDICE;
32 [PROPOSED] ORDER

33 STIPULATION TO DISMISS COMPLAINT WITHOUT PREJUDICE; [PROPOSED] ORDER
34 C 11-3879 SC

1 The parties¹ stipulate to the following, subject to the approval of the Court:
2 Plaintiffs' complaint in this action is hereby dismissed without prejudice, so that
3 Plaintiffs may pursue administrative remedies under the Federal Tort Claims Act. The parties
4 agree that this dismissal is without prejudice to Plaintiffs' refiling this action after Plaintiffs have
5 properly exhausted said administrative remedies.

6
7 DATED: 8/26/11
8
9


ERIK L. PETERSON
Attorney for Plaintiffs

10
11 MELINDA HAAG
12 United States Attorney
13 DATED: 8/26/11 By: 
14 NEILL T. TSENG
15 Assistant United States Attorney
16 Attorneys for Defendant
17
18 PURSUANT TO STIPULATION, IT IS SO ORDERED:
19
20 DATED: August 30, 2011
21
22
23
24
25
26
27



28 ¹ The United States was automatically substituted as the party defendant upon
removal. See Notice of Removal (Doc. #1) ¶ 5.