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12 Attorneys for Defendant Heather Dracup

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO)

15 Adobe Systems Incorporated,)	Case No. CV11-3880 SC
)	
16 Plaintiff,)	JOINT STIPULATION TO DISMISS
17 v.)	DEFENDANT HEATHER DRACUP
)	WITHOUT PREJUDICE PURSUANT
18 Jonathan Dracup, et al.,)	TO FED. R. CIV. P. 41(a)(1)(A)
)	
19 Defendants.)	
)	

20 Pursuant to Fed. R. Civ. P. 41(a)(1)(A), Plaintiff Adobe Systems Incorporated (“Adobe”)
 21 and Defendant Heather Dracup by and through their respective counsels of record, hereby stipulate
 22 and agree as follows:

23 WHEREAS Plaintiff filed its complaint against Defendant Heather Dracup on or about
 24 August 8, 2011;

25 WHEREAS Defendant Heather Dracup has not served an answer or motion for summary
 26 judgment;
 27

1 WHEREAS based upon Defendant Heather Dracup's representations, Plaintiff has agreed
2 to dismiss, without prejudice, Defendant Heather Dracup from this action;

3 WHEREAS Defendant Heather Dracup agrees that any and all applicable statutes of
4 limitations are tolled effective August 8, 2011, through and until the earlier of the final disposition
5 or end of the discovery period of the above-captioned action ;

6 NOW, THEREFORE, the Parties stipulate and agree that based upon the above agreements,
7 Defendant Heather Dracup, only, shall be dismissed without prejudice, each party to bear its own
8 costs and fees.

9 IT IS SO STIPULATED.

10
11 DATED: March 6, 2012

J. Andrew Coombs, A Professional Corp.

12
13 By: /s/ Annie S. Wang
14 J. Andrew Coombs
Annie S. Wang
Attorneys for Plaintiff Adobe Systems Incorporated

15
16 DATED: March 6, 2012

Law Offices of George A. Shohet

17 By: /s/ George A. Shohet
18 George A. Shohet
Attorney for Defendant Heather Dracup

19
20 **[PROPOSED] ORDER**

21 PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that Defendant Heather
22 Dracup, only, shall be dismissed without prejudice, any and all applicable statutes of limitations are
23 tolled effective August 8, 2011, through and until the earlier of the final disposition or end of the
24 discovery period of the above-captioned action, and each party to bear its own costs and fees.

25 DATED: 3/13/12

26
27 Hon. Samuel Conti
United States

