07685/1074/2118741.1 Stipulation for Dismissal of Action Case No.: C11-03966 JCS

No motion for class certification has been filed in this matter, and the Court has not

3.

certified any class.

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	4.	The dismissal of this case will not	preclude putative class members' claims, if any
Wells	s Fargo	denies that it breached any contract,	breached or owed any fiduciary duty, or violate
any a	pplicab	le law with respect to Hudson or any	member of the putative class alleged by Hudson

5. Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure allows the parties to stipulate to the dismissal of an action at any time. Rule 23(e) does not limit the right to stipulate to dismissal of this putative class action because it only applies to certified classes, and no class has been certified in this matter. No notice is required to putative class members under Rule 23(e) since, as explained above, the settlement and dismissal does not bind them in any way.

Accordingly, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Hudson and Wells Fargo agree that the action shall be dismissed in its entirety and with prejudice with respect to the claims by Hudson individually against Wells Fargo, and without prejudice as to any claims by the putative, uncertified class against Wells Fargo.

Hudson and Wells Fargo further agree that each party shall bear her or its own costs and attorneys' fees.

IT IS SO STIPULATED.

DATED: February 7, 2012 SEVERSON & WERSON A Professional Corporation

By: /s/ Erik Kemp
Erik Kemp

Attorneys for Defendants WELLS FARGO BANK, N.A.

DATED: February 7, 2012

Dated: February 8, 2012

BRAMSON, PLUTZIK, MAHLER & BIRKHAEUSER, LLP

/s/ Robert M. Bramson Robert M. Bramson

Storneys for Plaintiff ICTORIA HUDSON

<u>Attestation</u>: I, Erik Kemp, am the ECF user whose identification and password are being used to file this Stipulation for Dismissal of Entire Action with Prejudice. I hereby attest that Robert M. Bramson has concurred in this filing.

/s/ Erik Kemp

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