1 JAMES V. FITZGERALD, III (State Bar No. 55632) NOAH G. BLECHMAN (State Bar No. 197167) 2 MCNAMARA, NEY, BEATTY, SLATTERY, **BORGES & AMBACHER LLP** 3 1211 Newell Avenue Post Office Box 5288 4 Walnut Creek, CA 94596 Telephone: (925) 939-5330 Facsimile: (925) 939-0203 5 6 Attorneys for Defendants SAN RAMON POLICE DEPARTMENT, CHIEF SCOTT 7 HOLDER, CITY OF SAN RAMON, OFFICER PAUL BURKE, OFFICER JOSEPH NUNN, OFFICER T J REEDER, OFFICER 8 JONATHAN STEPHENS and OFFICER STANLEY SZETO 9 UNITED STATES DISTRICT COURT 10 NORTHERN DISTRICT OF CALIFORNIA 11 12 JORDAN EDWARD BRANSCUM, Case No. C11-04137 LB 13 Plaintiff, STIPULATION AND [PROPOSED] ORDER TO DISMISS ENTIRE ACTION. 14 WITH PREJUDICE PER FRCP 41(a)(2) VS. 15 SAN RAMON POLICE DEPARTMENT et Hon, Laurel Beeler Judge: 16 17 Defendants. 18 The parties, by and through their respective attorneys of record, hereby stipulate and 19 20

jointly request an Order from the Court to a dismissal of this entire action, with prejudice, in light of settlement of this action.

WHEREAS, Plaintiff hereby agrees to voluntarily dismiss, with prejudice, all of his claims for damages against Defendants, as against all Defendants, as alleged in Plaintiff's First Amended Complaint, filed in this matter. This dismissal would be a dismissal for the entire action, against all parties, with prejudice.

WHEREAS, each party agrees to bear its own fees and costs as to this dismissal.

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STIPULATION AND ORDER TO DISMISS ENTIRE ACTION WITH PREJUDICE- C11-04137 LB

1	The parties attest that co	oncurrence in the filing of these documents has been obtained from
2	each of the other Signatories, which shall serve in lieu of their signatures on the document.	
3	SO STIPULATED.	
4		
5,	Dated: February 3, 2016	LAW OFFICES OF PANOS LAGOS
6		By:/s/ Lagos, Panos
7		Panos Lagos, Esq. Attorney for Plaintiff, JORDAN EDWARD BRANSCUM
8	Dated: February 3, 2016	McNamara, Ney, Beatty, Slattery,
9		BORGES & AMBACHER LLP
10		By: /s/ Blechman, Noah James V. Fitzgerald, III / Noah G. Blechman
11		Attorneys for Defendants SAN RAMON POLICE DEPARTMENT, CHIEF
12	*	SCOTT HOLDER, CITY OF SAN RAMON, OFFICER PAUL BURKE, OFFICER JOSEPH NUNN,
13		OFFICER T J REEDER, OFFICER JONATHAN STEPHENS and OFFICER STANLEY SZETO
14		
15		ORDER
W007 43		ON AND REQUEST, IT IS ORDERED AS FOLLOWS:
15		
15 16	The Court hereby disn	ON AND REQUEST, IT IS ORDERED AS FOLLOWS:
15 16 17	The Court hereby disn	ON AND REQUEST, IT IS ORDERED AS FOLLOWS: nisses this entire action, as to all claims and Defendants, with
15 16 17 18	The Court hereby disn prejudice. Each party bears its IT IS SO ORDERED	ON AND REQUEST, IT IS ORDERED AS FOLLOWS: nisses this entire action, as to all claims and Defendants, with
15 16 17 18 19	The Court hereby disn prejudice. Each party bears its	ON AND REQUEST, IT IS ORDERED AS FOLLOWS: nisses this entire action, as to all claims and Defendants, with
15 16 17 18 19 20	The Court hereby disn prejudice. Each party bears its IT IS SO ORDERED	nisses this entire action, as to all claims and Defendants, with own fees and costs as to this dismissal.
15 16 17 18 19 20	The Court hereby disn prejudice. Each party bears its IT IS SO ORDERED	ON AND REQUEST, IT IS ORDERED AS FOLLOWS: nisses this entire action, as to all claims and Defendants, with
15 16 17 18 19 20 21 22	The Court hereby disn prejudice. Each party bears its IT IS SO ORDERED	Hon. Laurel Beeler
15 16 17 18 19 20 21 22 23	The Court hereby disn prejudice. Each party bears its IT IS SO ORDERED	Hon. Laurel Beeler
15 16 17 18 19 20 21 22 23 24	The Court hereby disn prejudice. Each party bears its IT IS SO ORDERED	Hon. Laurel Beeler
15 16 17 18 19 20 21 22 23 24 25	The Court hereby disn prejudice. Each party bears its IT IS SO ORDERED	Hon. Laurel Beeler