

McNAMARA, NEY, BEATTY, SLATTERY, BORGES & AMBACHER LLP  
ATTORNEYS AT LAW  
P.O. BOX 5288, WALNUT CREEK, CA 94596  
TELEPHONE: (925) 939-5330

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  
5 Facsimile: (925) 939-0203

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 JORDAN EDWARD BRANSCUM,

12 Plaintiff,

13 vs.

14 SAN RAMON POLICE DEPARTMENT et  
15 al.

16 Defendants.

Case No. C11-04137 LB

**STIPULATION AND ~~PROPOSED~~  
ORDER TO DISMISS ENTIRE ACTION,  
WITH PREJUDICE PER FRCP 41(a)(2)**

Judge: Hon. Laurel Beeler

17  
18  
19 The parties, by and through their respective attorneys of record, hereby stipulate and  
20 jointly request an Order from the Court to a dismissal of this entire action, with prejudice, in  
21 light of settlement of this action.

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

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

27  
28 ///

