

HUNTER PYLE, SBN 184260
MANA BARARI, SBN 275328
SUNDEEN SALINAS & PYLE
428 13th Street, 8th Floor
Oakland, California 94612

Telephone: (510) 663-9240
Facsimile: (510) 663-9241

hpyle@ssrplaw.com; mbarari@ssrplaw.com

Keith A. Watts, State Bar No. 208491
keith.watts@ogletreedeakins.com,
Michael J. Nader, State Bar No. 200425
michael.nader@ogletreedeakins.com
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
Steuart Tower, Suite 1300
One Market Plaza
San Francisco, CA 94105
Telephone: 415.442.4810
Facsimile: 415.442.4870

Attorneys for Defendant
CHART INTERNATIONAL, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DOUGLAS DAWSON,

Plaintiff,

vs.

CHART INTERNATIONAL, INC.,

Defendant.

Case No.: C12-00141

**PLAINTIFF’S REQUEST FOR DISMISSAL
WITH PREJUDICE AND RELATED
STIPULATION PER FRCP 41(A)(2) AND
ORDER THEREON**

**STIPULATION FOR DISMISSAL OF COMPLAINT WITH PREJUDICE PER FRCP 41(A)(2)
AND ORDER THEREON**
Case No. C12-00141

1 **STIPULATION**

2 TO THE COURT AND ALL PARTIES OF RECORD:

3 Plaintiff DOUGLAS DAWSON, by and through his attorneys of record, hereby requests this
4 Court to dismiss this action with prejudice. Pursuant to FRCP 41(a)(2), Defendant CHART
5 INTERNATIONAL, INC., (“Chart”) by and through its attorneys of record, represents Chart’s non-
6 objection to Plaintiff’s request to dismiss his case with prejudice, and thus Chart hereby stipulates to the
7 same. The parties have entered into a settlement agreement that already addresses each party’s
8 obligations regarding the payment of fees and costs.

9 Dated: August 8, 2012

SUNDEEN SALINAS & PYLE

10 By: /s/ Mana Barari

11 Attorneys for Plaintiff
12 DOUGLAS DAWSON

13 Dated: August 8, 2012

14 OGLETREE, DEAKINS, NASH, SMOAK &
15 STEWART

16 By: /s/ Michael Nader

17 Attorneys for Defendant
18 CHART INTERNATIONAL, INC.

19
20
21
22
23
24
25 **STIPULATION FOR DISMISSAL OF COMPLAINT WITH PREJUDICE PER FRCP 41(A)(2)
AND ORDER THEREON
Case No. C12-00141**

ORDER

The Court having read and considered the foregoing request and stipulation, and with good cause appearing, this action is dismissed with prejudice. The Court acknowledges that the parties have entered into a settlement agreement that addresses the payment of their respective fees and costs.

IT IS SO ORDERED

Dated: 8/9/12



UNITED STATES DISTRICT COURT JUDGE

**STIPULATION FOR DISMISSAL OF COMPLAINT WITH PREJUDICE PER FRCP 41(A)(2)
AND ORDER THEREON
Case No. C12-00141**

ATTESTATION OF E-FILED SIGNATURE

1 I, Mana Barari, Esq. am the ECF User whose ID and password are being used to filed this
2 Stipulation for Dismissal of Complaint with Prejudice per FRCP 41(A)(2) and Order Thereon. In
3 Compliance with General Order 45, X.B., I hereby attest that Michael Nader, Esq. has read and
4 approved this Stipulation for Dismissal of Complaint with Prejudice per FRCP 41(A)(2) and Order
5 Thereon and consents to its filing in this action.
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

25 **STIPULATION FOR DISMISSAL OF COMPLAINT WITH PREJUDICE PER FRCP 41(A)(2)
AND ORDER THEREON
Case No. C12-00141**