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Attorneys for Plaintiff/Counter-Defendant
CornerStone Staffing Solutions, Inc. and
Counter-Defendant Mary Anderson

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CORNERSTONE STAFFING
SOLUTIONS, INC., a California
corporation,

Plaintiff,

vs.

LARRY THAXTER JAMES, an
individual; *et al.*,

Defendants.

CASE NO. C12-01527 RS

**STIPULATION FOR DISMISSAL
WITH PREJUDICE; ~~[PROPOSED]~~
ORDER**

AND RELATED COUNTER-
CLAIMS

HILL, FARRER & BURRILL LLP
A LIMITED LIABILITY PARTNERSHIP
ATTORNEYS AT LAW
ONE CALIFORNIA PLAZA, 37TH FLOOR
300 SOUTH GRAND AVENUE
LOS ANGELES, CALIFORNIA 90071-3147

1 Plaintiff/Counter-Defendant CORNERSTONE STAFFING SOLUTIONS,
2 INC. (“CornerStone”) and Defendants/Counter-Claimants LARRY THAXTER
3 JAMES, DEPLOY HR, INC., HANBON-MI II, INC., and HANBON-CT I, LLC
4 (“Counterclaimants”), by and through their counsel of record, hereby stipulate as
5 follows:

6 (1) In order to avoid the uncertainty associated with protracted litigation,
7 the expense associated therewith, and in order to settle their differences,
8 CornerStone and Counterclaimants have agreed to a settlement with each other.

9 (2) CornerStone agrees to dismiss the entire complaint with prejudice,
10 except for its claims against Defendant Larry James, which are the subject of a
11 separate stipulation and judgment being filed concurrently herewith. The
12 defendants dismissed with prejudice are David R. Batton, Andre Douzdjian,
13 Marcos Barrera, Batton Technical Engineering Consultants, Inc., Batton, Inc.,
14 Hanbon-Caro I, LLC, Hanbon-MI I, LLC, Hanbon-MI II, Inc., Hanbon-Marlette I,
15 LLC, Hanbon-PA I, LLC, Hanbon-CT I, LLC, TEC Group, Inc., DeployHR, Inc.,
16 Deploy HR, Inc.

17 (3) Counterclaimants agree to dismiss all counterclaims in their entirety
18 with prejudice—i.e., all claims against CornerStone Staffing Solutions, Inc. and
19 Mary Anderson.

20 (4) The recovery of fees and costs is being addressed in separate
21 settlement documents.

22 **IT IS SO STIPULATED.**

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DATED: August 21, 2015

HILL, FARRER & BURRILL LLP

By: /s/ Clayton Hix
CLAYTON J. HIX
Attorneys for Plaintiff/Counter-
Defendant CORNERSTONE
STAFFING SOLUTIONS, INC.; and
Counter-Defendant MARY
ANDERSON

DATED: August 21, 2015

SCHEPER, KIM & HARRIS, LLP

By: /s/ David Scheper
DAVID SCHEPER
Attorneys for Defendant/Counter-
Claimant LARRY JAMES and
Defendants DEPLOY HR, INC.;
DEPLOYHR, INC.; HANBON MI I,
LLC; HANBON MI II, INC.; TEC
GROUP, INC.; HANBON-CARO,
LLC; HANBON-MARLETTE, LLC;
HANBON-PA I LLLC

DATED: August 21, 2015

MORISON & PROUGH, LLP

By: /s/ William Morison
WILLIAM C. MORISON
Attorneys for Defendant/
Counterclaimant HANBON-CT I,
LLC

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~~PROPOSED~~ ORDER

Pursuant to the foregoing stipulation of the Parties, the Court orders as follows:

(1) The entire complaint is dismissed with prejudice, except for CornerStone’s claims against Defendant Larry James, which are the subject of a separate stipulation and judgment. Specifically, the following defendants are dismissed with prejudice: David R. Batton, Andre Douzjdjian, Marcos Barrera, Batton Technical Engineering Consultants, Inc., Batton, Inc., Hanbon-Caro I, LLC, Hanbon-MI I, LLC, Hanbon-MI II, Inc., Hanbon-Marlette I, LLC, Hanbon-PA I, LLC, Hanbon-CT I, LLC, TEC Group, Inc., DeployHR, Inc., and Deploy HR, Inc.

(2) All counterclaims are dismissed with prejudice—i.e., all claims against CornerStone Staffing Solutions, Inc. and Mary Anderson.

IT IS SO ORDERED.

Date: 8/21/15



HON. RICHARD SEEBORG
U.S. DIST. COURT JUDGE