

1 HANSON BRIDGETT LLP
 RAYMOND F. LYNCH, SBN 119065
 2 rlynch@hansonbridgett.com
 MOLLY L. KABAN, SBN 232477
 3 mkaban@hansonbridgett.com
 JANE M. FEDDES, SBN 282117
 4 jfeddes@hansonbridgett.com
 425 Market Street, 26th Floor
 5 San Francisco, California 94105
 Telephone: (415) 777-3200
 6 Facsimile: (415) 541-9366

7 Attorneys for Defendant
 BANK OF AMERICA, N.A.
 8

9 LAURENCE F. PADWAY, #83914
 LAW OFFICES OF LAURENCE F. PADWAY
 10 1516 Oak Street, Suite 109
 Alameda, CA 94501
 11 Telephone: (510) 814-6100
 Facsimile: (510) 814-0650

12 Attorneys for Plaintiff
 13 OMID BEHJOU

14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**
 16

17 OMID BEHJOU,
 18 Plaintiff,
 19 v.
 20 BANK OF AMERICA CORPORATION,
 21 Defendant.
 22

CASE NO. CV 12 1590 NC

**JOINT STIPULATION OF DISMISSAL
 WITH PREJUDICE AND ~~PROPOSED~~
 ORDER PURSUANT TO FRCP 41(a)(1)
 and (2)**

Judge: Hon. Nathanael M. Cousins

23
 24 Plaintiff OMID BEHJOU ("Plaintiff") and Defendant BANK OF AMERICA
 25 CORPORATION ("Defendant"), by and through their attorneys of record, file this
 26 Stipulation and Order of Dismissal with Prejudice pursuant to Federal Rule of Civil
 27 Procedure sections 41(a)(1) and (2).

28 WHEREAS, Plaintiff filed this lawsuit on March 29, 2012.

1 WHEREAS, Plaintiff and Defendant have entered into a Settlement Agreement
2 and Release which settles all aspects of the lawsuit against Defendant without
3 admission of liability of wrongdoing, liability or fault.

4 WHEREAS, Plaintiff moves to dismiss the with prejudice the lawsuit against
5 Defendant pursuant to FRCP 41(a)(1) and (2). Each side shall pay its own attorneys'
6 fees and costs except as expressly set forth in the Settlement Agreement and Release.

7 WHEREAS Defendant, who has answered the complaint, agrees to the dismissal
8 with prejudice. The case is not a class action, and no receiver has been appointed.

9 Wherefore, Plaintiff and Defendant, by and through their attorneys of record, so
10 stipulate.

11 DATED: December 4, 2013

HANSON BRIDGETT LLP

13 By: /S/ RAYMOND F. LYNCH

14 RAYMOND F. LYNCH
15 MOLLY L. KABAN
16 JANE M. FEDDES
Attorneys for Defendant
BANK OF AMERICA

17 DATED: December 4, 2013

LAW OFFICES OF LAURENCE F. PADWAY

19 By: /S/ LAURENCE F. PADWAY

20 LAURENCE F. PADWAY
21 Attorneys for Plaintiff
22 OMID BEHJOU

23 IT IS SO ORDERED.

24 Dated: January 8, 2014, 2013

