

1 MICHELE C. BARNES (SBN: 187239)  
 michele.barnes@klgates.com  
 2 ZACHARIAH D. BAKER (SBN 271620)  
 zac.baker@klgates.com  
 3 **K&L GATES LLP**  
 Four Embarcadero Center, Suite 1200  
 4 San Francisco, CA 94111  
 Telephone: 415.882.8200  
 5 Facsimile: 415.882.8220

JOHN LANGDOC (SBN: 235509)  
 DENYSE CLANCY (SBN: 255276)  
 TIFFANY DICKENSON (SBN: 264364)  
**BARON & BUDD, P.C.**  
 3102 Oak Lawn Ave., Suite 1100  
 Dallas, TX 72519  
 Tel: 214.521.3605; 800.222.2766  
 Fax: 214.520.1181

6 Attorneys for Defendant  
 CRANE CO.

Attorneys for Plaintiff

**RECEIVED**

7  
 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN FRANCISCO DIVISION

JUN - 6 2012  
 RICHARD W. WIERING  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

11 JAMES DEL PINO and  
 BEVERLY I. DEL PINO,  
 12  
 13 Plaintiffs,  
 14 v.  
 15 3M COMPANY, et al.  
 16 Defendants.

Civil Action No.: CV-12-002928-EDL  
 (Superior Court of the State of California  
 for the County of San Francisco, CA  
 NO. CGC-12-276039)

**STIPULATION FOR DISMISSAL WITH  
 PREJUDICE PURSUANT TO FED. R.  
 CIV. PRO. 41(a); WITHDRAWAL OF  
 NOTICE OF REMOVAL**

17  
 18  
 19 WHEREAS Plaintiffs JAMES DEL PINO and BEVERLY I. DEL PINO want this case to be  
 20 remanded to San Francisco Superior Court and defendant CRANE CO. wants to be dismissed from  
 21 this case,

22 IT IS HEREBY STIPULATED AND AGREED by and between counsel for Plaintiffs  
 23 JAMES DEL PINO and BEVERLY I. DEL PINO, and counsel for Defendant CRANE CO.,  
 24 pursuant to Federal Rules of Civil Procedure 41(a)(2), that the Complaint of Plaintiffs JAMES DEL  
 25 PINO and BEVERLY I. DEL PINO, Case No. CV-12-002928-EDL, in the above-captioned action  
 26 may be and is hereby dismissed with prejudice as to Defendant CRANE CO., only. The parties shall  
 27 each bear their own costs.  
 28

1 IT IS HEREBY FURTHER STIPULATED AND AGREED by and between counsel for  
2 Plaintiffs JAMES DEL PINO and BEVERLY I. DEL PINO, and counsel for Defendant CRANE  
3 CO., that Crane Co. withdraws its Notice of Removal in the instant action as it is moot in light of  
4 the forgoing stipulated dismissal. As such, Crane Co. stipulates to and agrees with Plaintiffs' request  
5 that the case be remanded

6 IT IS SO STIPULATED.

7 BARON & BUDD, P.C.

8  
9 Dated: June 6, 2012

10 By: Tiffany Dickenson  
11 TIFFANY DICKENSON (SBN: 264364)  
12 Attorneys for Plaintiffs

13 K&L GATES LLP

14  
15 Dated: June 6, 2012

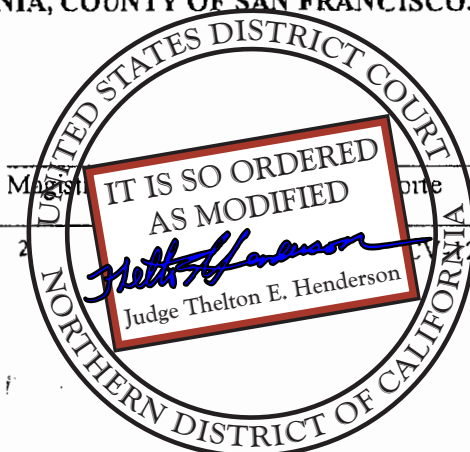
16 By: ZB  
17 ZACHARIAH D. BAKER (SBN 271620)  
18 Attorneys for Defendant  
19 CRANE CO.

20 PURSUANT TO STIPULATION, IT IS SO ORDERED THAT PLAINTIFFS'  
21 COMPLAINT AS TO DEFENDANT CRANE CO. IS DISMISSED WITH PREJUDICE.  
22 EACH PARTY IS TO BEAR ITS OWN COSTS.

23 IT IS FURTHER ORDERED THAT ~~CRANE CO.'S NOTICE OF REMOVAL IN~~  
24 ~~THIS ACTION IS WITHDRAWN, AND THE CASE BE REMANDED TO THE SUPERIOR~~  
25 COURT OF THE STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO.

26  
27 Dated: 06/12/2012

28 STIPULATION FOR DISMISSAL &  
WITHDRAWAL OF REMOVAL



CV 12-002928-EDL