

1 George F. Camerlengo (SBN 50232)
 2 george@ccandjlaw.com
 3 CAMERLENGO & JOHNSON
 4 643 Bair Island Road, Ste. 400
 5 Redwood City, CA 94063
 6 Tel. (650) 366-2911
 7 Fax (650) 365-7981

8 Attorney for Plaintiff
 9 KRISTINNA GROTZ

10 Michele Ballard Miller (SBN 104198)
 11 mbm@millerlawgroup.com
 12 Katherine L. Kettler (SBN 231586)
 13 klk@millerlawgroup.com
 14 MILLER LAW GROUP
 15 A Professional Corporation
 16 111 Sutter Street, Suite 700
 17 San Francisco, CA 94104
 18 Tel. (415) 464-4300
 19 Fax (415) 464-4336

20 Attorneys for Defendant
 21 KAISER FOUNDATION HOSPITALS

22
 23 IN THE UNITED STATES DISTRICT COURT
 24 NORTHERN DISTRICT OF CALIFORNIA

25 KRISTINNA GROTZ, an individual,

26 Plaintiff,

27 v.

28 KAISER FOUNDATION HOSPITALS, INC.,
 THE PERMANENTE MEDICAL GROUP,
 INC., SEIU-UNITED HEALTHCARE
 WORKERS WEST,

Defendants.

Case No.: CV 12 3539 JSC EMC

**STIPULATION AND ~~[PROPOSED]~~ ORDER
 FOR DISMISSAL**

Complaint filed: July 6, 2012

1 It is hereby stipulated by Plaintiff Kristinna Grotz ("Grotz") and Defendant
2 Kaiser Foundation Hospitals ("KFH"), as follows:

3
4 1. Grotz will dismiss with prejudice TPMG as a named defendant in this
5 matter. Grotz and TPMG will bear their own fees and costs incurred in connection with this
6 dismissal.

7
8 2. KFH stipulates it was Grotz's employer during all relevant times
9 alleged in the Complaint in this matter, and that TPMG was not Grotz's employer during
10 any relevant times alleged in the complaint in this matter. During the pendency of this
11 action, neither Grotz nor KFH will assert otherwise.

12
13 IT IS SO STIPULATED.

14
15 Dated: August 24, 2012

CAMERLENGO & JOHNSON

16
17 By: _____/S/
18 George F. Camerlengo
19 Attorney for Plaintiff
20 Kristinna Grotz

21 Dated: August 24, 2012

MILLER LAW GROUP
A Professional Corporation

22 By: _____/S/
23 Michele B. Miller
24 Attorneys for Defendant
25 Kaiser Foundation Hospitals

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

As stipulated and agreed to by Plaintiff Kristinna Grotz and Defendant Kaiser Foundation Hospitals, defendant The Permanente Medical Group, Inc. is hereby dismissed from this action with prejudice.

IT IS SO ORDERED.

Dated: 8/29, 2012

4815-6485-6336, v. 1

HONORABLE

