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5 Attorney for Plaintiff  
 MARSHALL LOSKOT ,  
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 8 UNITED STATES DISTRICT COURT  
 9 DISTRICT OF CALIFORNIA

10 MARSHALL LOSKOT,

CASE NO. CV-12-4165-MEJ

11 Plaintiffs,

STIPULATION OF DISMISSAL AND  
~~PROPOSED~~ ORDER THEREON

12 v.  
 13

14 ROYAL CAFE; EUGENE O. WONG and  
 ARLENE L. WONG, CO-TRUSTEES of  
 15 EUGENE O. WONG and ARLENE L.  
 WONG REVOCABLE LIVING TRUST;  
 16 MAJID K. MAHANI and NAHID F.  
 MAHANI, CO-TRUSTEES of MAJID K.  
 17 MAHANI and NAHID F. MAHANI  
 TRUST; ANTHONY C. CHAN and LILY  
 18 Y. CHAN, as TRUSTEES of the CHAN  
 19 FAMILY TRUST; and MAJID K.  
 20 MAHANI, an individual dba ROYAL  
 21 CAFÉ

22 Defendants.  
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24  
 25 The parties, by and through their respective counsel, stipulate to dismissal of this action in  
 26 its entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(2). Outside of the terms of the  
 27 Settlement Agreement and General Release ("Agreement") herein, each party is to bear its own  
 28 costs and attorneys' fees.

STIPULATION OF DISMISSAL AND [PROPOSED] ORDER THEREON

CASE NO. CV-12-4165-MEJ

1 The parties further consent to and request that the Court retain jurisdiction over enforcement of  
2 the Agreement. See Kokonen v. Guardian Life Ins. Co., 511 U.S. 375 (1994) (empowering the  
3 district courts to retain jurisdiction over enforcement of settlement agreements).

4 Therefore, IT IS HEREBY STIPULATED by and between parties to this action through  
5 their designated counsel that the above-captioned action become and hereby is dismissed with  
6 prejudice pursuant to Federal Rules of Civil Procedure 41(a)(2).

7 This stipulation may be executed in counterparts, all of which together shall constitute one  
8 original document.

9  
10 Dated: June 6, 2013

THOMAS E. FRANKOVICH  
A PROFESSIONAL LAW CORPORATION

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12 By: /s/ Thomas E. Frankovich  
13 Thomas E. Frankovich  
14 Attorney for MARSHALL LOSKOT

15 Dated: June 13, 2013

TERRY CARLSON,  
ATTORNEY AT LAW

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17  
18 By: Terry Carlson  
19 Terry Carlson  
20 Attorney for Defendants ROYAL CAFE; EUGENE  
21 O. WONG and ARLENE L. WONG, CO-  
22 TRUSTEES of EUGENE O. WONG and ARLENE  
23 L. WONG REVOCABLE LIVING TRUST; MAJID  
24 K. MAHANI and NAHID F. MAHANI, CO-  
25 TRUSTEES of MAJID K. MAHANI and NAHID F.  
26 MAHANI TRUST; ANTHONY C. CHAN and  
27 LILY Y. CHAN, as TRUSTEES of the CHAN  
28 FAMILY TRUST; and MAJID K. MAHANI, an  
individual dba ROYAL CAFE

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ORDER

IT IS HEREBY ORDERED that this matter is dismissed with prejudice pursuant to Fed.R.Civ.P.41(a)(2). IT IS FURTHER ORDERED that the Court shall retain jurisdiction for the purpose of enforcing the parties' Settlement Agreement and General Release should such enforcement be necessary

Dated: June 17, 2013



Honorable Magistrate Maria-Elena James  
UNITED STATE DISTRICT JUDGE