

1 EUGENE RYU, Bar No. 209104
MAUREEN A. RODGERS, Bar No. 245876
2 MICHAEL G. LEGGIERI, Bar No. 253791
LITTLER MENDELSON, P.C.
3 650 California Street, 20th Floor
San Francisco, California 94108
4 Telephone: 415.433.1940
Facsimile: 415.399.8490
5 eryu@littler.com
mrodgers@littler.com
6 mleggieri@littler.com

7 Attorneys for Defendant
FOREVER 21, INC.

8
9 STEVE HOLLAND, Bar No. 132321
RING HUNGER HOLLAND & SCHENONE LLP
10 985 Moraga Road, Suite 210
Lafayette, CA 94549
11 Telephone: 925.226.8248
Facsimile: 925.550.8509
12 sholland@rhslaw.com

13 Attorneys for Defendants
SPI COMMERCE PARK, L.P. and
14 SPI IH II, LP

15
16 PAUL L. REIN, Bar No. 43053
CATHERINE M. CABALO, Bar No. 248198
CELIA MCGUINNESS, Bar No. 159420
17 LAW OFFICES OF PAUL L. REIN
200 Lakeside Drive, Suite A
18 Oakland, California 94612
Telephone: 510.832.5001
19 Facsimile: 510.832.4787
reinlawoffice@aol.com

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21 Attorneys for Plaintiff
NICOLE BROWN-BOOKER

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LITTLER MENDELSON, P.C.
650 California Street
20th Floor
San Francisco, CA 94108.2693
415.433.1940

STIPULATION AND PROPOSED ORDER
FOR DISMISSAL

Case No. C12-6565

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4

5 NICOLE BROWN-BOOKER,

6 Plaintiff,

7 v.

8 FOREVER 21 RETAIL, INC.; SPI
9 COMMERCIAL PARK, LP; SPI IH II, LP;
and DOES 1-10, Inclusive,

10 Defendants.
11

Case No. C12-6565 MEJ

**STIPULATION AND ~~PROPOSED~~
ORDER FOR DISMISSAL WITH
PREJUDICE AS TO ALL DEFENDANTS**

12 Plaintiff Nicole Brown-Booker ("Plaintiff") and Defendants Forever 21 Retail, Inc. ("Forever
13 21"), SPI Commerce Park, L.P. (erroneously sued as "SPI Commercial Park, L.P.") and SPI IH II,
14 LP by and through their respective counsel of record, hereby enter into the following stipulation:

15 On December 28, 2012, Plaintiff filed her Complaint in this matter. Plaintiff and Defendants
16 entered into a Consent Decree resolving Plaintiff's claims for injunctive relief on September 11,
17 2013 (Docket No. 26). The parties have resolved Plaintiff's remaining claims through a separate
18 Settlement Agreement. Plaintiff and Defendants hereby stipulate to dismiss the entire action as to all
19 Defendants with prejudice. The Parties agree that the Court shall retain jurisdiction over this Action
20 for 18 months for the sole purpose of hearing actions to enforce the Consent Decree.

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San Francisco, CA 94108.2693
415.433.1940
STIPULATION AND PROPOSED ORDER
FOR DISMISSAL

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IT IS SO STIPULATED.

Dated: October 3, 2013

/s/ Catherine M. Cabalo
PAUL L. REIN
CATHERINE M. CABALO
CELIA MCGUINNESS
LAW OFFICES OF PAUL L. REIN
Attorneys for Plaintiff
NICOLE BROWN-BOOKER

Dated: October 3, 2013

/s/ Maureen A. Rodgers
EUGENE RYU
MAUREEN A. RODGERS
MICHAEL G. LEGGIERI
LITTLER MENDELSON, P.C.
Attorneys for Defendant
FOREVER 21 RETAIL, INC.

Dated: October 3, 2013

/s/ Steve Holland
STEVE HOLLAND
RING, HUNGER, HOLLAND &
SCHENONE, LLP
Attorneys for Defendants SPI Commerce Park,
L.P., and SPI IH, LP

I, Maureen Rodgers, hereby attest that I have the consent of the aforementioned counsel in submitting this stipulation to the Court and that each has agreed to this stipulation and proposed dismissal.

1 **PUSURANT TO STIPULATION, IT IS SO ORDERED:**

2 The action of *Nicole Brown-Booker v. Forever 21 Retail, Inc., SPI Commerce Park, L.P.*
3 (erroneously sued as “SPI Commercial Park, L.P.”), *SPI II, LP, and Does 1-10*, inclusive, is hereby
4 dismissed with prejudice. The Court shall retain jurisdiction to enforce the Consent Decree entered
5 between the Parties on September 11, 2013, and filed with this Court on September 12, 2013
6 (Docket No. 26) for 18 months after this dismissal.
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9 DATED: October 4, 2013



Honorable Maria Elena James
United States Magistrate Judge

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