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7 Attorney for Plaintiff
8 JOHN RODGERS

9
10 UNITED STATES DISTRICT COURT
11
12 NORTHERN DISTRICT OF CALIFORNIA

13 JOHN RODGERS,
14
15 Plaintiff,

16 vs.

17 MIN'S KITCHEN RESTAURANT; CHAE
18 PAK; MIN YOUNG PAK; NINA CHABRA,
19 RAJ CHABRA, CHABRA LIVING 2003
20 TRUST; and DOES 1-50, Inclusive
21
22 Defendants.

Case No.: C13-01712 NC
Civil Rights

**STIPULATION FOR DISMISSAL OF
ACTION; [~~PROPOSED~~] ORDER**

23 **STIPULATION**

24 Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, plaintiff JOHN
25 RODGERS ("Plaintiff") and defendants MIN'S KITCHEN RESTAURANT; CHAE PAK; MIN
26 YOUNG PAK; NINA CHABRA; RAJ CHABRA; and CHABRA LIVING 2003 TRUST
27 defendants ("Defendants"), by and through their respective attorneys of record, stipulate that:

1. This case has been settled and all issues and controversies between the parties
have been resolved to their mutual satisfaction pursuant to the terms of a Settlement Agreement
and General Release ("Settlement Agreement") entered into between the parties;

2. Plaintiff's Complaint in the above-entitled action shall be dismissed with

1 prejudice as against all Defendants;

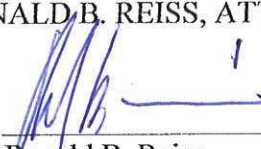
2 3. The parties consent to and request that the Court retain jurisdiction to enforce the
3 Settlement Agreement for a period of 18 months after the date hereof, under the authority of
4 *Kokonen v. Guardian Life Ins. Co.*, 511 U.S. 375, 381-82 (1994); and

5 4. Outside the terms of the Settlement Agreement, all parties shall bear his, her, or
6 its own costs and fees in the action.

7
8 **IT IS SO STIPULATED.**

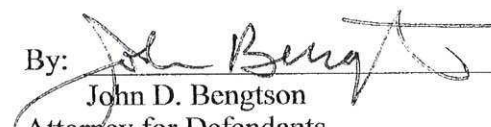
9
10 Dated: 12/9, 2013

RONALD B. REISS, ATTORNEY AT LAW

11
12 By: 
13 Ronald B. Reiss
Attorney for Plaintiff JOHN RODGERS

14 Dated: 12/6, 2013

LAW OFFICES OF JOHN D. BENGTON

15
16 By: 
17 John D. Bengton
18 Attorney for Defendants
19 MIN'S KITCHEN RESTAURANT; CHAE PAK;
20 MIN YOUNG PAK; NINA CHABRA, RAJ
21 CHABRA, and CHABRA LIVING 2003 TRUST

1 **ORDER**

2 The parties having so stipulated,

3 IT IS HEREBY ORDERED that:

4 1. Plaintiff's Complaint in the above-entitled action shall be dismissed with
5 prejudice as against all Defendants;

6 2. By consent of the parties, the Court shall retain jurisdiction in this matter for the
7 purpose of enforcing the terms of the Settlement Agreement for a period of 18 months from the
8 date hereof; and

9 3. All parties shall bear his, her, or its own costs and fees in the action.

10 Dated: December 10, 2013

