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11 Attorneys for Defendants  
 PORT OF OAKLAND, WILLIAM MORRISON;  
 12 KENNETH TAYLOR; OMAR BENJAMIN;  
 WILLIAM EDWARD; KIMBERLY A. LINDERME;  
 13 CHERYL PERRY LEAGUE; GINA CARRADINE;  
 MICHAEL MITCHELL; TED MANKOWSKI; JOE  
 14 ECHELBERRY (named as JOEL EICHENBERRY);  
 GARY RUTLAND; DENYCE HOLSEY AND  
 15 FRANKIE JOHNSON

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18 Jaimen Joaquin Dominiquez,  
 19 Plaintiff,

20 v.

21 Port of Oakland, a Department of the City of  
 Oakland, a Municipal Corporation; Service  
 22 Employees International Union Local 1021, a  
 labor union; William Morrison aka Bill  
 23 Morrison, Kenneth Taylor, Omar Benjamin,  
 William Edward aka Bill Edwards, Kimberly  
 24 A. Linderme, Cheryl Perry League, Gina  
 Carradine, Millie Cleveland, Michael  
 25 Mitchell, Ted Mankowski, Joel Eichenberry,  
 Gary Rutland, Denyce Holsey, Frankie  
 26 Johnson and Does 1-100, inclusive,

27 Defendants

**Case No. CV-13-03756-RS**

**STIPULATION AND ~~PROPOSED~~  
 ORDER OF DISMISSAL WITH  
 PREJUDICE PURSUANT TO FRCP  
 41(a)(1)**

**Judge: Hon. Richard Seeborg**

1 **TO THE COURT CLERK, ALL PARTIES AND THEIR COUNSEL:**

2 Pursuant to Federal Rule of Civil Procedure 41(a)(1), the parties in the above-captioned  
3 action, by and through their undersigned counsel, hereby stipulate that this action be and hereby is  
4 dismissed in its entirety with prejudice.

5 This Stipulation is made pursuant to the parties' Confidential Severance Agreement and  
6 Release of All Claims. The parties shall bear their own attorneys' fees and costs of suit incurred  
7 herein.

8 **IT IS SO STIPULATED.**

9 Dated: June 18, 2014

LAW OFFICES OF MANUEL A. JUAREZ

10 By: /s/ Manuel A. Juarez (as authorized on  
11 June 17, 2014)  
12 Manuel A. Juarez

13 Attorney for Plaintiff  
JAIMEN JOAQUIN DOMINIQUEZ

14 Dated: June 18, 2014

PORT OF OAKLAND  
15 Danny Wan  
16 Daniel Connolly

17 JONES DAY

18 By: /s/ Aaron L. Agenbroad  
19 Aaron L. Agenbroad

20 Attorneys for Defendants  
21 PORT OF OAKLAND; WILLIAM  
22 MORRISON; KENNETH TAYLOR; OMAR  
23 BENJAMIN; WILLIAM EDWARD;  
24 KIMBERLY A. LINDERME; CHERYL  
25 PERRY LEAGUE; GINA CARRADINE;  
26 MICHAEL MITCHELL; TED  
27 MANKOWSKI; JOE ECHELBERRY (aka  
28 JOEL EICHENBERRY); GARY RUTLAND;  
DENYCE HOLSEY AND FRANKIE  
JOHNSON


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~~PROPOSED~~ ORDER OF DISMISSAL WITH PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41, and with the stipulation and consent of all parties, IT IS HEREBY ORDERED that the above-entitled action is DISMISSED WITH PREJUDICE, each party to bear its own fees and costs.

**IT IS SO ORDERED.**

Dated: 6/23, 2014

By:   
The Honorable Richard Seeborg  
United States District Court Judge for the  
Northern District of California