

Exhibit A

1 Thomas B. Mayhew (SBN 183539)
tmayhew@fbm.com
2 Alex Reese (SBN 280530)
areese@fbm.com
3 Julia F. Kropp (SBN 298363)
jkropp@fbm.com

4 FARELLA BRAUN + MARTEL LLP
5 235 Montgomery Street, 17th Floor
San Francisco, CA 94104
6 Telephone: (415) 954-4400
Facsimile: (415) 954-4480

7 Attorneys for Plaintiff
8 Sanjay Bhatnagar

BRIAN J. STRETCH (CABN 163973)
United States Attorney
SARA WINSLOW (DCBN 457643)
Chief, Civil Division
ROBIN M. WALL (CABN 235690)
Assistant United States Attorney
REBECCA A. FALK (CSBN 226798)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7071
Fax: (415) 436-6748
Robin.Wall@usdoj.gov
Rebecca.Falk@usdoj.gov

9 Attorneys for Defendant
10 United States of America

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13
14 SANJAY BHATNAGAR

15 Plaintiff,

16 v.

17 UNITED STATES OF AMERICA

18 Defendant.
19

Case No. 14-cv-00327-MEJ (LB)

**STIPULATION AND ~~PROPOSED~~
ORDER OF DISMISSAL WITH
PREJUDICE**

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21
22 As authorized by Federal Rule of Civil Procedure 41(a), Plaintiff Sanjay Bhatnagar and
23 Defendant United States of America, having entered into a settlement agreement and each party
24 having executed the agreement, hereby stipulate to dismissal with prejudice of all of Mr. Bhatnagar's
25 claims against the United States in this action.

26 Each party will bear its own costs and attorneys' fees.

27 **It is so stipulated, through counsel of record.**
28

Exhibit A

1 July 20, 2017

FARELLA BRAUN + MARTEL LLP

2 By: /s/ Alex Reese
3 Alex Reese

4 Attorneys for Plaintiff Sanjay Bhatnagar

5 July 21, 2017

BRIAN J. STRETCH
United States Attorney

6 By: /s/ Robin M. Wall
7 Robin M. Wall
8 Assistant United States Attorney

9 Attorneys for Defendant United States of
10 America

11 FILER'S ATTESTATION

12 In compliance with Civil L.R. Rule 5-1, I hereby attest that all parties have concurred in the
13 filing of this Stipulation and (Proposed) Order.

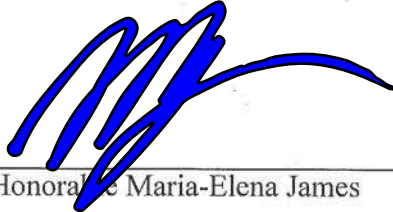
14 August 22, 2017

15 
Robin M. Wall

16
17 [PROPOSED] ORDER

18 Pursuant to stipulation; IT IS SO ORDERED.

19
20 Date: August 28, 2017

21 
22 Honorable Maria-Elena James
23 United States Magistrate Judge
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