

KLEIN LAW GROUP

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Enterprises, Inc., and Olympic Manor, Inc.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

MARCIAL VELEZ AND ALICE FAITH
VELEZ, individually and on behalf of all
aggrieved employees,

PLAINTIFFS,

VS.

ADORA ANCHETA, INDIVIDUALLY;
ANCHETA ENTERPRISES, INC.,
OLYMPIC MANOR, INC., AND DOES 1
THROUGH 25,

DEFENDANTS

CASE NO.: 14-cv-01182 NC

JOINT STIPULATION OF DISMISSAL
OF PLAINTIFF ALICE FAITH VELEZ'S
CLAIMS WITH PREJUDICE AND
[~~PROPOSED~~ ORDER]

Judge: Hon. Nathanael M. Cousins
Location: 450 Golden Gate Ave, 15th Floor
San Francisco, CA 94102

Action Filed: February 6th, 2014 [California
State Court]

Removal Filed: March 13th, 2014

1 Plaintiff ALICE FAITH VELEZ and Defendants ADORA ANCHETA, ANCHETA
2 ENTERPRISES, INC., OLYMPIC MANOR, INC. (“Parties”), by and through their undersigned
3 counsel, HEREBY STIPULATE that all of Plaintiff ALICE FAITH VELEZ’S claims,
4 counterclaims, and affirmative defenses, be hereby dismissed with prejudice pursuant to Federal
5 Rules of Civil Procedure, Rule 41(a)(1)(ii).

6 Each Party will bear its own costs and attorneys’ fees with respect to Plaintiff ALICE
7 FAITH VELEZ’S claims only.

8 The Parties request that the Court retain jurisdiction to enforce the Settlement Agreement
9 between Plaintiff ALICE FAITH VELEZ and Defendants ADORA ANCHETA, ANCHETA
10 ENTERPRISES, INC., OLYMPIC MANOR, INC. by issuing an Order that explicitly retains
11 jurisdiction to enforce the settlement agreement pursuant to Kokkonen v. Guardian Life Ins. Co. of
12 America, 511 U.S. 375, 381-82, (1994).

13 Each undersigned representative of the Parties certifies that he or she is fully authorized to
14 enter into and execute the terms and conditions of this Joint Stipulation of Dismissal.

15 IT IS SO STIPULATED.

16 Dated: October 22, 2014

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18 BY s/ Alexei Kuchinsky
19 Alexei Kuchinsky, Esq.
20 Attorneys for Plaintiffs

21 Dated: October 22, 2014

Shea & McIntyre, A P.C.

22 BY s/ John F. McIntyre, Jr.
23 John F. McIntyre, Jr., Esq.
24 Attorneys for Defendants

25 PURSUANT TO STIPULATION, IT IS SO ORDERED

26 Dated: October 27, 2014

27 UNITED STATES DISTRICT COURT OF CALIFORNIA, NORTHERN DISTRICT

