| 1   | RACHEL LEDERMAN (SBN 130192) Rachel Lederman & Alexsis C. Beach, Attorneys 558 Capp Street San Francisco, CA 94110 Telephone: 415.282.9300; Fax: 415.285.5066 rachel@bllaw.info |  |
|-----|---|--|
| 2   |   |  |
| 3   |   |  |
| 4   |   |  |
| 5   | Attorneys for plaintiff Russell Bates   |  |
| 6   |   |  |
| 7   | UNITED STATES DISTRICT COURT  |  |
| 8   | NORTHERN DISTRICT OF CALIFORNIA   |  |
| 9   | SAN FRANCISCO DIVISION  |  |
| 10  |   | CACENO DALA 100ALD   |
| 11  | RUSSELL BATES,  | CASE NO. 3:14-cv-1984 LB                                       |
| 12  | Plaintiff,  | STIPULATION AND [ <del>PROPOSED</del> ]<br>ORDER FOR VOLUNTARY |
| 13  | v.  | DISMISSAL WITH PREJUDICE                                       |
| 14  | CITY OF OAKLAND, ET AL.,  | PURSUANT TO THE SETTLEMENT AGREEMENT                           |
| 15  | Defendants.   | BETWEEN ALL PARTIES  |
| 16  |   |  |
| 17  | THE PARTIES, BY AND THROUGH THEIR RESPECTIVE COUNSEL OF   |  |
| 18  | RECORD, DO HEREBY STIPULATE AND AGREE that pursuant to the terms of the   |  |
| 19  | settlement of the entire action reached between the parties, this action shall be dismissed   |  |
| 20  | with prejudice, each party to bear their own attorneys' fees and costs.   |  |
| 21  | THEREFORE, the parties respectfully   | request that the Court enter the within                        |
| 22  |   |  |
| 23  | STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL  Bates v. City of Oakland, et al., Case No. 3:14-cv-1984 LB  1  |  |
| 24  |   |  |
| - ' |   |  |

| 1  | voluntary order of dismissal with prejudice; and that the Case Management Conference, |  |
|----|---|--|
| 2  | currently scheduled for March 12, 2015, be vacated.                                   |  |
| 3  |   |  |
| 4  | Dated: March 4, 2015 /S/  |  |
| 5  | RACHEL LEDERMAN Attorney for plaintiff  |  |
| 6  | BARBARA J. PARKER, City Attorney  |  |
| 7  | ARLENE M. ROSEN, Senior Deputy City Attorney By: /S/ Arlene Rosen                     |  |
| 8  | Affelie Rosell Attorneys for Defendants   |  |
| 9  | CITY OF OAKLAND, et al.   |  |
| 10 | PURSUANT TO STIPULATION, IT IS SO ORDERED:  |  |
| 11 |   |  |
| 12 | Dated: March 6 , 2015   |  |
| 13 | HON. LAUREL BEELER United States Magistrate Judge                                     |  |
| 14 |   |  |
| 15 |   |  |
| 16 |   |  |
| 17 |   |  |
| 18 |   |  |
| 19 |   |  |
| 20 |   |  |
| 21 |   |  |
| 22 | STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL   |  |
| 23 | Bates v. City of Oakland, et al., Case No. 3:14-cv-1984 LB 2                          |  |
| 24 |   |  |