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15 Attorneys for Plaintiff DAVID JOHNSON

16 UNITED STATES DISTRICT COURT
 17 FOR THE NORTHERN DISTRICT OF CALIFORNIA

DAVID JOHNSON,)	Case No. 3:14-cv-03142-NC
)	
Plaintiff,)	
)	STIPULATION OF DISMISSAL AND
vs.)	PROPOSED ORDER
)	
TRUONG CHUNG VIET,)	
)	
Defendant.)	
)	

18 The parties hereby stipulate as follows:

- 19 1. The parties have reached a full and final settlement of all issues in this action and
- 20 have executed a settlement agreement. Some parts of the agreement are to be performed in the
- 21 future.
- 22 2. Although the parties are hereby dismissing this action with prejudice, they agree
- 23 that the Court shall retain jurisdiction over this action and the parties hereto in order to be able to
- 24 enforce the terms of the Settlement Agreement.
- 25 3. The parties request the Court to retain jurisdiction for 18 months from the date
- 26 hereof in order to enforce the terms of the Settlement Agreement under the authority of
- 27
- 28

1 Kokkonen v. Guardian Life Insurance Co. Of America, 511 U.S. 375, 381-82 (1994) and General
2 Order No. 56 at ¶ 7 (N.D. Cal.) (July 17, 2003) ("Should any settlement be conditioned upon
3 future conduct such as remediation, the assigned judge will retain jurisdiction to enforce that
4 component of the settlement.").

5 4. IT IS HEREBY STIPULATED by and between the parties to this action through
6 their designated counsel that this action be and hereby is dismissed with prejudice pursuant to
7 FRCP 41(a)(2), and that the Court retains jurisdiction to enforce the terms of the Settlement
8 Agreement for 18 months after the date hereof.

9
10 Dated: January 28, 2015

Respectfully submitted,

LAW OFFICE OF JASON G. GONG
A Professional Corporation

/s/ Jason G. Gong

11
12 By: _____

Jason G. Gong
Attorney for Plaintiff David Johnson

13
14
15 Dated: January 28, 2015

16 /s/ Mary R. Dang
17 By: Mary R. Dang
18 Mary R. Dang
19 Attorney for Defendant Truong Chung Viet

20 **[PROPOSED] ORDER**

21 Pursuant to the parties' stipulation, the Court hereby dismisses the above-referenced action
22 with prejudice and retains jurisdiction to enforce the terms of the parties' settlement agreement.

23 IT IS SO ORDERED:

24
25 Dated: February 3
~~January 28, 2015~~

