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14	UNITED STA	TES DISTRICT COURT
15	NORTHERN DI	STRICT OF CALIFORNIA
16	SAN FRA	NCISCO DIVISION
17		
18	THOMAS FLAISHANS,	Case No. 3:14-CV-03249-MMC
19	Plaintiff,	STIPULATED REQUEST FOR DISMISSAL
20	V.	[PROPOSED] ORDER
21	CORAM SPECIALTY INFUSION SERVICES, INC. and DOES 1 through 10,	
22	inclusive,	
23	Defendants.	
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(CASE NO. 3:14-CV-03249-MMC)

1. STIPULATED REQUEST FOR DISMISSAL; PROPOSED ORDER

1	Plaintiff Thomas Flaishans ("Plaintiff") and Coram Specialty Infusion Services, Inc.
2	("Defendant" or "Coram") (collectively, the "Parties"), having settled this action on an individual
3	basis, by and through their counsel of record, hereby agree and stipulate as follows:
4	1. Plaintiff hereby dismisses all claims and all causes of action as to all Defendants,
5	brought individually on his own behalf, WITH PREJUDICE, pursuant to Rule 41(a) of the Federal
6	Rules of Civil Procedure.
7	2. Plaintiff hereby dismisses all claims and all causes of action as to all Defendants,
8	brought on behalf of others, ¹ WITHOUT PREJUDICE, pursuant to Rule 41(a) of the Federal Rules
9	of Civil Procedure.
10	3. Plaintiff and Defendant agree to bear their own costs and attorney's fees.
11	SO STIPULATED.
12	
13	Dated: February 12, 2016 /S/ Gregory Iskander GREGORY ISKANDER
14	LITTLER MENDELSON, P.C. Attorneys for Defendant
15	CORAM SPECIALTY INFUSION
16	Dated: February 12, 2016
17	/S/ William L. Marder
18	WILLIAM L. MARDER POLARIS LAW GROUP LLP
19	Attorneys for Plaintiff THOMAS FLAISHANS
20	I the files of this decourant attest that all other signatories listed and an values habelf the
21	I, the filer of this document, attest that all other signatories listed, and on whose behalf the
22	filing is submitted, concur in the filing's content and have authorized the filing.
23	Dated: February 12, 2016 /S/ Gregory Iskander
24	GREGORY ISKANDER LITTLER MENDELSON, P.C.
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27	Pending before the Court on February 26, 2016 at 9:00 a.m., is a hearing for approval of a
28	settlement as to the representative PAGA claims. The Parties have agreed to forego such settlement and dismiss said claims without prejudice.

2.

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STIPULATED REQUEST FOR DISMISSAL; PROPOSED ORDER

1	<u>ORDER</u>
2	Upon the parties' stipulation, and for good cause, it is SO ORDERED.
3	In light of the above, the hearing currently scheduled for February 26, 2016, is hereby
4	VACATED.
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6	Dated: February 16, 2016 United States District Judge
7	Maxine M. Chesney.
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