

REED SMITH LLP  
A limited liability partnership formed in the State of Delaware

James L. Sanders (SBN 126291)  
Email: jsanders@reedsmith.com  
REED SMITH LLP  
1901 Avenue of the Stars, Suite 700  
Los Angeles, CA 90067  
Telephone: +1 310 734 5200  
Facsimile: + 1 310 734 5299

Raymond A. Cardozo (SBN 173263)  
Email: rcardozo@reedsmith.com  
REED SMITH LLP  
101 Second Street, Suite 1800  
San Francisco, CA 94105  
Telephone: +1 415 543 8700  
Facsimile: + 1 415 391 8269

James C. McCarroll (*Pro Hac Vice*)  
Email: jmccarroll@reedsmith.com  
Jordan W. Siev (*Pro Hac Vice*)  
Email: jsiev@reedsmith.com  
REED SMITH LLP  
599 Lexington Avenue  
New York, New York 10022  
Telephone: +1 212 549 0209  
Facsimile: + 1 212 521 5450

Attorneys for Plaintiff  
Andre Ward

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ANDRE WARD,

Plaintiff,

vs.

DAN GOOSSEN and GOOSSEN TUTOR  
PROMOTIONS, LLC,

Defendants.

No.: 3:14-cv-03510-TEH

**JOINT STIPULATION PURSUANT  
TO FEDERAL RULE OF CIVIL  
PROCEDURE 41(a)(1)(A)(ii)  
DISMISSING ACTION WITH  
PREJUDICE**

Hearing Date: No Date Set  
Hearing Time: No Time Set  
Place: Courtroom 12

Hon. Thelton E. Henderson

1 Plaintiff, Andre Ward, defendant Goossen-Tutor Promotions, LLC, and  
2 defendant Debbie Goossen as executor of the estate of Dan Goossen, by and through  
3 their respective counsel, hereby stipulate and agree as follows:  
4

5 Whereas the Complaint in this action was filed on August 4, 2014 and the  
6 defendants filed an Answer to the Complaint on October 29, 2014,  
7

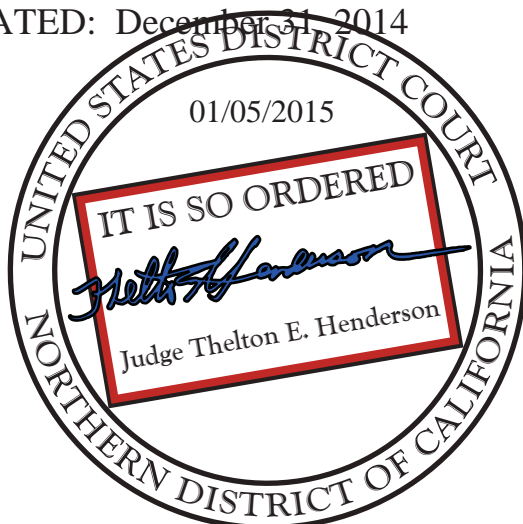
8 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the parties hereby  
9 stipulate and agree to dismiss this action with prejudice with all parties bearing their  
10 own respective attorneys' fees and costs.  
11

12 DATED: December 31, 2014  
13

14 REED SMITH LLP

15 By: /s/ James L. Sanders  
16 James L. Sanders (SBN 126291)<sup>1</sup>  
17 Attorneys for Plaintiff Andre Ward

18 DATED: December 31, 2014  
19



20 GREENBERG GLUSKER FIELDS  
21 CLAMAN & MACHTINGER LLP

22 By: /s/ Charles N. Shephard  
23 Charles N. Shephard (SBN 078129)  
24 Attorneys for Defendants Goossen- Tutor  
25 Promotions, LLC and Debbie Goossen as  
26 executor of the estate of Dan Goossen

27 <sup>1</sup> Pursuant to Local Rule 5-1(i)(3), filing counsel attests that all other signatories listed,  
28 on whose behalf the filing is submitted, concur in the filing's content and have  
authorized the filing