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6 **UNITED STATES DISTRICT COURT**
 7 **NORTHERN DISTRICT OF CALIFORNIA**

10 JOHN RODGERS) Plaintiff,) 11 vs.) 12 KEVIN S. YOO, an individual, and DOES) 13 1-10 inclusive,) 14 Defendants.) 15) 16)	Case No. 3:14-cv-03854-LB Civil Rights PLAINTIFF’S REQUEST AND [PROPOSED] ORDER OF DISMISSAL WITH PREJUDICE
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17 Pursuant to Fed. R. Civ. P. 41(a)(2) Plaintiff John Rodgers (“Plaintiff”) hereby requests
 18 that the Court dismiss Plaintiff’s Complaint against Defendant Kevin S. Yoo (“Defendant”) with
 19 prejudice.

20 The parties attended a court sponsored mediation on August 14, 2015 and settled the
 21 matter in its entirety. Subsequently, Plaintiff and Defendant entered into a formal settlement
 22 agreement. Plaintiff provided Defendant with a draft stipulation and proposed order of dismissal
 23 of Plaintiff’s complaint with prejudice. Plaintiff received no response from Defendant’s counsel
 24 and has therefore been unable to obtain a signed stipulation from Defendant. In order to comply
 25 with the November 5th, 2015 deadline (Docket No. 20), Plaintiff respectfully requests that the
 Court dismiss Plaintiff’s complaint with prejudice.

26 Dated: November 5, 2015 27 28	<u>/s/ Irene Karbelashvili</u> By: Irene Karbelashvili Attorney for Plaintiff JOHN RODGERS
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~~[PROPOSED]~~ ORDER

IT IS HEREBY ORDERED that:

1. Plaintiff's Complaint in the above-entitled action shall be dismissed with prejudice as against Defendant KEVIN S. YOO.
2. The Court is to retain jurisdiction to enforce the terms of the parties' SETTLEMENT AGREEMENT AND RELEASE OF ALL CLAIMS.
3. Each Party shall bear its own costs and fees in this action.

Dated: November 6, 2015



Honorable Laurel Beeler, United States
Magistrate Judge