1	THOMAS E. FRANKOVICH (S.B.N. 074414) THOMAS E. FRANKOVICH, <i>A PROFESSIONAL LAW CORPORATION</i> 1832-A Capitol Street Vallejo, CA 94590 Telephone: (415) 444-5800 Facsimile: (415) 674-9900 Email: <u>tfrankovich@disabilitieslaw.com</u> Attorney for Plaintiffs IRMA RAMIREZ; and		
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8	DAREN HEATHERLY		
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10	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA		
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12	IRMA RAMIREZ, et al.,) CASE NO. CV-14-05517-MMC	
13	Plaintiffs,		
14	V.	STIPULATION OF DISMISSAL AND HPROPOSED ORDER THEREON	
15	WAGON WHEEL LIQUOR & DELI, et		
16	al.,		
17	Defendants.		
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22	The Parties, by and through their respective counsel, stipulate to dismissal of this action in its entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(2). IT IS HEREBY STIPULATED by and between parties to this action through their designated counsel that the above-captioned action become and hereby is dismissed with prejudice and each side is to bear its own costs and attorneys' fees.		
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	STIPULATION OF DISMISSAL AND [PROPOSED] ORDER		
		Dockets.Jus	

1	The parties further consent to and request that the Court retain jurisdiction over		
2	enforcement of the Agreement. See Kokonen v. Guardian Life Ins. Co., 511 U.S. 375 (1994)		
3	(empowering the district courts to retain jurisdiction over enforcement of settlement		
4	agreements).		
5	This stipulation may be executed in counterparts, all of which together shall		
6	constitute one original document.		
7		Respectfully Submitted,	
8		THOMAS E. FRANKOVICH, APLC	
9		A PROFESSIONAL LAW CORPORATION	
10		By: <u>/s/ Thomas E. Frankovich</u> Thomas E. Frankovich	
11		Attorney for Plaintiffs	
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13		PERRY JOHNSON ANDERSON MILLER & MOSKOWITZ LLP	
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15		By: <u>/s/ Scott A. Lewis</u> Scott A. Lewis	
16		Attorney for Defendants	
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18	ORDER		
19	IT IS HEREBY ORDERED that this matter is dismissed with prejudice pursuant to		
20	Fed.R.Civ.P.41(a)(2) and each side is to bear its own costs and attorneys' fees. IT IS		
21	FURTHER ORDERED that the Court shall retain jurisdiction for the purpose of enforcing		
22	the parties' Settlement Agreement and General Release should such enforcement be		
23			
24	necessary.	1	
25	Dated: <u>May 25</u> , 2016	Makine M. Chedney	
26		Horf. Joseph C. Spero UNITED STATES MAGISTRATE JUDGE	
27		Hon. Maxine M. Chesney	
28		UNITED STATES DISTRICT JUDGE	
	STIPULATION OF DISMISSAL AND [PROPOSED] ORDER		