Case No. C 14-05601 SI

1 BRIAN J. STRETCH (CABN 163973) GRANTED United States Attorney 2 ALEX G. TSE (CABN 152348) 3 Chief, Civil Division Judge Susan Illston 4 MARK R. CONRAD (CABN 255667) Assistant United States Attorney 5 450 Golden Gate Avenue, Box 36055 6 San Francisco, California 94102-3495 Telephone: (415) 436-7025 7 Fax: (415) 436-6748 mark.conrad@usdoj.gov 8 Attorneys for Defendant 9 10 Clayeo C. Arnold (SBN 65070) Anthony M. Ontiveros (SBN 152758) 11 Kiersta D. Perlee (SBN 187675) CLAYEO C. ARNOLD 12 A PROFESSIONAL LAW CORPORATION 865 Howe Avenue 13 Sacramento, CA 95825 Telephone: (916) 924-3100 14 Fax: (916) 924-1829 Email: aontiveros@justice4you.com 15 Email: kperlee@justice4you.com 16 UNITED STATES DISTRICT COURT 17 NORTHERN DISTRICT OF CALIFORNIA 18 SAN FRANCISCO DIVISION 19 20 SAMARN OLSEN and CASE NO. C 14-05601 SI 21 NEOLANI OLSEN-RODRIGUEZ. STIPULATION OF DISMISSAL WITH 22 Plaintiffs, PREJUDICE PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(II) AND N.D. CAL. 23 CIV. L.R. 77-2(c) 24 UNITED STATES OF AMERICA, 25 Defendant. 26 27 28 STIP OF DISMISSAL

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## STIPULATION OF DISMISSAL WITH PREJUDICE

It is hereby stipulated by and between the undersigned Plaintiffs Samarn Olsen and Neolani Olsen-Rodriguez and the undersigned Defendant United States of America, by and through their respective attorneys, as follows:

WHEREAS, Plaintiff filed the above-captioned action on December 23, 2014, see Dkt. No. 1;

WHEREAS, Plaintiff and Defendant, wishing to avoid any further litigation and controversy and to settle and compromise fully and an all claims and issues that have been raised, or could have been raised, in this action, entered into a Stipulation and Agreement of Compromise and Settlement ("Agreement") on March 23, 2016, in consideration of the mutual promises and based on the terms contained therein, and other good and valuable consideration, the adequacy of which was acknowledged by Plaintiffs and Defendant;

WHEREAS this action is not subject to Rules 23(e), 23.1(c), 23.2, or 66, and therefore may be dismissed voluntarily pursuant to the stipulation of all parties who have appeared, see Fed. R. Civ. P. 41(a)(1)(A)(ii), and may be ordered dismissed by the Clerk without further direction of a Judge, see N.D. Cal. Civ. L.R. 77-2(c);

NOW, THEREFORE, it is hereby agreed, by and between Plaintiffs Samarn Olsen and Neolani Olsen-Rodriguez, by and through their undersigned counsel, that this action shall be and hereby is dismissed with prejudice, each party to bear its own fees and costs.

IT IS SO STIPULATED.

DATED: March 23, 2016

Respectfully submitted,

BRIAN J. STRETCH

Acting United States Attorney

MARK R. CONRAD

Assistant United States Attorney

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STIP TO CONT. MEDIATION DEADLINE Case No. C 14-05601 SI