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9 Attorney for Plaintiff
10 IRMA RAMIREZ

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 IRMA RAMIREZ,
14 Plaintiff,

15 v.

16 101 SMITH RANCH ROAD STRIP
17 MALL, *et al.*,
18 Defendants.

) CASE NO. 3:15-cv-02578-LB
)
) **STIPULATION OF DISMISSAL AND**
) **[PROPOSED] ORDER THEREON**

21
22 The Parties, by and through their respective counsel, stipulate to dismissal of this
23 action in its entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(2).

24 IT IS HEREBY STIPULATED by and between parties to this action through their
25 designated counsel that the above-captioned action become and hereby is dismissed with
26 prejudice and each side is to bear its own costs and attorneys' fees.
27

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 Dated: March 2, 2016

THOMAS E. FRANKOVICH, APLC
A PROFESSIONAL LAW CORPORATION

10 By: /s/ Thomas E. Frankovich
11 Thomas E. Frankovich
12 Attorney for Plaintiff

13 Dated: March 2, 2016

BRADLEY, CURLEY, ASIANO, BARRABEE,
ABEL & KOWALSKI, P.C.

15 By: /s/ Sara Allman
16 Sara Allman
17 Attorney for Defendants

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 necessary.
24

25 Dated: March 3, 2016

26 
27 _____
28 Hon. Laurel Beeler
UNITED STATES MAGISTRATE JUDGE