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9 Attorney for Plaintiff Michael Connally, Successor in Interest  
 10 To Patrick Connally,

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

13 Michael Connally, Successor in Interest to ) 14 Patrick Connally, ) 15 Plaintiff, ) 16 v. ) 17 Cole Valley Café, <i>et al.</i> , ) 18 Defendants. ) 19 ) 20 ) 21 )	CASE NO. 3:15-cv-03543-MEJ  <b>STIPULATION OF DISMISSAL AND</b> <b><del>PROPOSED</del> ORDER THEREON</b>
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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  
 28

**STIPULATION OF DISMISSAL AND [PROPOSED] ORDER**

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: July 27, 2016

THOMAS E. FRANKOVICH, APLC  
*A PROFESSIONAL LAW CORPORATION*

9 By: /s/ Thomas E. Frankovich

10 Thomas E. Frankovich

11 Attorney for Plaintiff Michael Connally, Successor in  
12 Interest to Patrick Connally

13 Dated: July 27, 2016

DANFOURA LAW OFFICES

14 By: /s/ Samer Danfoura

15 Samer Danfoura

16 Attorney for all Defendants (for Settlement Purposes)

17 **ORDER**

18 IT IS HEREBY ORDERED that this matter is dismissed with prejudice pursuant to  
19 Fed.R.Civ.P.41(a)(2) and each side is to bear its own costs and attorneys' fees. IT IS  
20 FURTHER ORDERED that the Court shall retain jurisdiction for the purpose of enforcing  
21 the parties' Settlement Agreement and General Release should such enforcement be  
22 necessary.  
23

24 Dated: July 27, 2016



25  
26 Hon. Maria-Elena James  
27 UNITED STATES MAGISTRATE JUDGE  
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