

1 Michael F. Ram, CSB #104805
 Email: mram@rocklawcal.com
 2 Karl Olson, CSB #104760
 Email: kolson@rocklawcal.com
 3 Susan S. Brown, CSB #287986
 Email: sbrown@rocklawcal.com
 4 RAM, OLSON, CEREGHINO & KOPCZYNSKI
 5 555 Montgomery Street, Suite 820
 San Francisco, California 94111
 6 Telephone: (415) 433-4949
 7 Facsimile: (415) 433-7311

8 [Additional Counsel Appear on Signature Page]

9 *Attorneys for Plaintiffs*

10 UNITED STATES DISTRICT COURT
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

13 ANGELINA FREITAS, REBECCA LYON and
 MARESA KENDRICK, on their own behalf and
 14 on behalf of others similarly situated,

15 Plaintiffs,

16 v.

17 BOUNCEBACK, INC., a Missouri
 18 corporation, CHECK CONNECTION, INC., a
 19 Kansas corporation, STONE FENCE
 HOLDINGS, INC., a Missouri corporation,
 20 and GALE KRIEG,

21 Defendants.

NO. 3:15-cv-03560-RS

**STIPULATION AND ~~PROPOSED~~
 ORDER DISMISSING THE ENTIRE
 ACTION**

Complaint Filed: August 3, 2015

Honorable Richard Seeborg

DEMAND FOR JURY

DATE:

TIME:

LOCATION: Courtroom 3 - 17th Floor

I. STIPULATION

25 Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiffs Angelina Freitas, Rebecca Lyon and
 26 Maresa Kendrick (hereinafter "Plaintiffs"), and BounceBack, Inc. Check Connection, Inc. Stone
 27 Fence Holdings, Inc. and Gale Krieg (hereinafter "Defendants"), by and through their attorneys

STIPULATION AND [PROPOSED] ORDER DISMISSING THE ENTIRE ACTION - 1

CASE NO. 3:15-cv-03560-RS

1 of record, stipulate to dismissal of Plaintiffs' claims against Defendants with prejudice and
2 without an award of fees and costs to either party. This dismissal with prejudice includes the
3 claims of class members covered by the settlement finally approved by the Court in *Cavnar et al.*
4 *vs. BounceBack, Inc., et al.*, No. 2:14-cv-00235-RMP, Dkt. No. 153 (E.D. Wash. Sept. 15, 2016).
5 *See* Dkt. No. 50-1 (The Honorable Rosanna Malouf Peterson's order approving the class
6 settlement).

7 STIPULATED, DATED AND RESPECTFULLY SUBMITTED this 26th day of
8 October, 2016.

9
10 TERRELL MARSHALL LAW GROUP PLLC PAINE HAMBLEN LLP

11 By: /s/ Beth E. Terrell, CSB #178181
12 Beth E. Terrell, CSB #178181
13 Email: bterrell@terrellmarshall.com
14 Blythe H. Chandler, *Admitted Pro Hac Vice*
15 Email: bchandler@terrellmarshall.com
16 936 North 34th Street, Suite 300
17 Seattle, Washington 98103-8869
18 Telephone: (206) 816-6603
19 Facsimile: (206) 319-5450

20 Michael F. Ram, CSB #104805
21 Email: mram@rocklawcal.com
22 Karl Olson, CSB #104760
23 Email: kolson@rocklawcal.com
24 Susan S. Brown, CSB #287986
25 Email: sbrown@rocklawcal.com
26 RAM, OLSON, CEREGHINO
27 & KOPCZYNSKI
555 Montgomery Street, Suite 820
San Francisco, California 94111
Telephone: (415) 433-4949
Facsimile: (415) 433-7311

Paul Arons, CSB #84970
Email: lopa@rockisland.com
LAW OFFICE OF PAUL ARONS
685 Spring Street, Suite 104
Friday Harbor, Washington 98250
Telephone: (360) 378-6496
Facsimile: (360) 378-6498

By: /s/ Gregg R. Smith, Admitted Pro Hac Vice
Gregg R. Smith, *Admitted Pro Hac Vice*
Email: gregg.smith@painehamblen.com
Scott C. Cifrese, *Admitted Pro Hac Vice*
Email: scott.cifrese@painehamblen.com
717 West Sprague Avenue, Suite 1200
Spokane, Washington 99201
Telephone: (509) 455-6000
Facsimile: (509) 838-0007

Robert F. Tyson, Jr., CSB #147177
Email: rtyson@tysonmendes.com
Jacob Felderman, CSB #229400
Email: jfelderman@tysonmendes.com
Kelly Denham, CSB #285314
Email: kdenham@tysonmendes.com
TYSON & MENDES
5661 La Jolla Boulevard
La Jolla, California 92037
Telephone: (858) 459-4400
Facsimile: (858) 459-3864

Attorneys for Defendants

1 Deepak Gupta
2 Email: deepak@guptawessler.com
3 GUPTA WESSLER PLLC
4 1735 20th Street, NW
5 Washington, DC 20009
6 Telephone: (202) 888-1741
7 Facsimile: (202) 888-7792

8 *Attorneys for Plaintiffs*

9 II. LOCAL RULE 5-1(I)(3) STATEMENT

10 Pursuant to Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this
11 document has been obtained from counsel for all parties, and that I will maintain records to
12 support this concurrence by all counsel subject to this stipulation as required under the local
13 rules.

14 DATED this 26th day of October, 2016.

15 TERRELL MARSHALL LAW GROUP PLLC

16 By: /s/ Beth E. Terrell, CSB #178181
17 Beth E. Terrell, CSB #178181
18 Email: bterrell@terrellmarshall.com
19 936 North 34th Street, Suite 300
20 Seattle, Washington 98103
21 Telephone: (206) 816-6603
22 Facsimile: (206) 319-5450

23 *Attorneys for Plaintiffs and the Proposed Classes*

24 III. ~~PROPOSED~~ ORDER

25 This matter came before the above-entitled Court on the Stipulation for Dismissal with
26 Prejudice of the Entire Action. After reviewing the files and records herein, and the Court having
27 been fully advised, it is hereby:

ORDERED that Plaintiffs' claims against Defendants with prejudice and without an
award of fees and costs to either party. This dismissal with prejudice includes the claims of class

STIPULATION AND [PROPOSED] ORDER DISMISSING THE ENTIRE
ACTION - 3

CASE NO. 3:15-cv-03560-RS

1 members covered by the settlement finally approved by the Court in *Cavnar, et al. vs.*
2 *BounceBack, Inc., et al.*, No. 2:14-cv-00235-RMP, Dkt. No. 153 (E.D. Wash. Sept. 15, 2016).
3

4 IT IS SO ORDERED.

5 Dated this 26th day of October, 2016.

6 

7 _____
8 UNITED STATES DISTRICT JUDGE
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27