

1 Alexander F. Giovannello (CSB # 125562)  
 Thomas C. Swann (CSB #229422)  
 2 **GIOVANNELLO LAW GROUP**  
 One Pointe Drive, Suite 300  
 3 Brea, California 92821  
 4 Ph: (714) 364-4000  
 Fax: (714) 364-4001  
 5

6 Attorneys for Defendants:  
 GRANCARE, LLC dba VALE HEALTHCARE CENTER;  
 MARINER HEALTH CARE MANAGEMENT COMPANY  
 7 AND REMY RHODES  
 8

9 **UNITED STATES DISTRICT COURT**  
 10 **NORTHERN DISTRICT OF CALIFORNIA**  
 11

12 WILLIE JOHNSON, by and through his  
 Successor in Interest, Velma Bagby;  
 13 VELMA BAGBY, individually; WILLIAM  
 JOHNSON, Sr., individually; VERONICA  
 14 HUDSON, individually; ELDRIDGE  
 JOHNSON, individually; CYNTHIA  
 15 MACKEY, individually; and LATONYA  
 MORRIS, individually; WILLIE  
 16 JOHNSON, individually; ARLANA  
 JOHNSON, individually; SHONDA  
 17 JOHNSON, Individually; and, AZALIA  
 JOHNSON  
 18

19 Plaintiffs,

20 vs.

21 GRANCARE, LLC dba VALE  
 HEALTHCARE CENTER; MARINER  
 HEALTH CARE MANAGEMENT  
 22 COMPANY; MARINER HEALTH CARE,  
 INC.; FAS, LLC.; REMY RHODES; and  
 23 DOES 1-100.

24 Defendants.  
 25

Case No.: 3:15-CV-03585-RS  
 ORDER  
 JOINT STIPULATION TO DISMISS WITH  
 PREJUDICE THE ENTIRE ACTION AS TO  
 ALL DEFENDANTS PURSUANT TO  
 FEDERAL RULE OF CIVIL PROCEDURE 41

DEPT: Courtroom 3 – 17<sup>th</sup> Floor

JUDGE: Hon. Richard Seeborg

27 WHEREAS on August 4, 2016, Plaintiffs WILLIE JOHNSON, by and through his  
 28 Successor in Interest, Velma Bagby; VELMA BAGBY, individually; WILLIAM JOHNSON,

1  
 JOINT STIPULATION TO DISMISS WITH PREJUDICE THE ENTIRE ACTION AS TO ALL DEFENDANTS  
 PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41

1 Sr., individually; VERONICA HUDSON, individually; ELDRIDGE JOHNSON, individually;  
 2 CYNTHIA MACKEY, individually; and LATONYA MORRIS, individually; WILLIE  
 3 JOHNSON, individually; ARLANA JOHNSON, individually; SHONDA JOHNSON,  
 4 Individually; and, AZALIA JOHNSON (hereinafter "Plaintiffs") and Defendants GRANCARE,  
 5 LLC dba VALE HEALTHCARE CENTER AND REMY RHODES (hereinafter "Defendants")  
 6 filed a joint stipulation and order dismissing the Elder Abuse and Violation of Patient's Rights  
 7 causes of action with prejudice.

8 WHEREAS, pursuant to Federal Rule of Civil Procedure 41, Plaintiffs now dismiss the  
 9 entire action with prejudice as to all Defendants.

11 **IT IS SO STIPULATED.**

13 Dated: August 26, 2016

**LANZONE MORGAN**

14 By:


  
 Anthony C. Lanzone  
 Attorney for Plaintiffs

15 WILLIE JOHNSON, by and through his Successor  
 16 in Interest, Velma Bagby; VELMA BAGBY,  
 17 individually; WILLIAM JOHNSON, Sr.,  
 18 individually; VERONICA HUDSON, individually;  
 19 ELDRIDGE JOHNSON, individually; CYNTHIA  
 20 MACKEY, individually; and LATONYA  
 21 MORRIS, individually; WILLIE JOHNSON,  
 22 individually; ARLANA JOHNSON, individually;  
 SHONDA JOHNSON, Individually; and, AZALIA  
 JOHNSON

24 Dated: August 31, 2016

**GIOVANNIELLO LAW GROUP**


25 By:

  
 Alexander F. Giovanniello  
 Thomas C. Swann  
 Attorneys for Defendants  
 GRANCARE, LLC dba VALE HEALTHCARE  
 CENTER and REMY RHODES

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**IT IS SO ORDERED:**

October 11,  
Dated: ~~August~~ \_\_\_\_\_, 2016

By:   
Hon. Richard Seeborg  
Judge of the United States District Court