

KAZEROUNI LAW GROUP, APC  
245 FISCHER AVENUE, UNIT D1  
COSTA MESA, CA 92626

1 **KAZEROUNI LAW GROUP, APC**  
2 Abbas Kazerounian, Esq. (SBN: 249203)  
ak@kazlg.com  
3 Matthew M. Loker, Esq. (SBN: 279939)  
ml@kazlg.com  
4 245 Fischer Avenue, Unit D1  
5 Costa Mesa, CA 92626  
6 Telephone: (800) 400-6808  
7 Facsimile: (800) 520-5523

8 **HYDE & SWIGART**  
9 Joshua B. Swigart, Esq. (SBN: 225557)  
josh@westcoastlitigation.com  
10 Alexander H. Lim, Esq. (297525)  
alex@westcoastlitigation.com  
11 2221 Camino Del Rio South, Suite 101  
12 San Diego, CA 92108  
13 Telephone: (619) 233-7770  
14 Facsimile: (619) 297-1022

15 *Attorneys for Plaintiff,*  
16 Manal Ereikat

17 **UNITED STATES DISTRICT COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**

19 **MANAL EREIKAT,**

20 Plaintiff,

21 v.

22 **MICHAEL & ASSOCIATES,**  
23 **PC,**

24 Defendant.

Case No.: 15-cv-3768 WHA

**JOINT STIPULATION TO DISMISS  
THE ACTION WITH PREJUDICE  
PURSUANT TO FED. R. CIV. P.  
41(A)**

**HON. WILLIAM ALSUP**

25 ///

26 ///

27 ///

28 **JOINT STIPULATION TO DISMISS THE ACTION WITH PREJUDICE PURSUANT TO FED. R. CIV.  
P. 41(A)**

1 Plaintiff MANAL EREIKAT (“Plaintiff”) and Defendant MICHAEL &  
2 ASSOCIATES, PC (“Defendant”), by and through their undersigned counsel,  
3 hereby stipulate and agree as follows:

4 **RECITALS**

5 WHEREAS, Plaintiff filed Plaintiff’s Complaint on August 18, 2015 [ECF  
6 No. 1];

7 WHEREAS, Defendant filed an Answer in response to Plaintiff’s Complaint  
8 on September 14, 2015 [ECF No. 16];

9 WHEREAS, the Parties amicably resolved the Parties’ dispute [See ECF No.  
10 26];

11 WHEREAS, the Parties have complied with all respective obligations as  
12 required by Defendant’s Offer.

13 **STIPULATION**

14 The Parties hereby jointly move to dismiss the Action WITH PREJUDICE  
15 with each party to bear its own costs and attorneys’ fees.

16  
17 Dated: March 10, 2016

Respectfully submitted,

18  
19 **KAZEROUNI LAW GROUP, APC**

20 By: /s/ Matthew M. Loker  
21 MATTHEW M. LOKER, ESQ.  
22 ATTORNEY FOR PLAINTIFF

23 **MICHAEL & ASSOCIATES, PC**

24 By: /s/ Lisa D. Dubowski  
25 LISA D. DUBOWSKI, ESQ.  
26 ATTORNEY FOR DEFENDANT

**SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to all defense counsel, and that I have obtained their authorization to affix electronic signatures to this document.

Dated: March 10, 2016

**KAZEROUNI LAW GROUP, APC**

By:           /s/ Matthew M. Loker            
MATTHEW M. LOKER, ESQ.  
ATTORNEY FOR PLAINTIFF

**KAZEROUNI LAW GROUP, APC  
245 FISCHER AVENUE, UNIT D1  
COSTA MESA, CA 92626**

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

1  
2  
3 **UNITED STATES DISTRICT COURT**  
4 **NORTHERN DISTRICT OF CALIFORNIA**  
5

6 **MANAL EREIKAT,**

7 Plaintiff,

8 v.

9 **MICHAEL & ASSOCIATES,**  
10 **PC,**

11 Defendant.

**Case No.:** 15-cv-3768 WHA


**[PROPOSED] ORDER OF  
DISMISSAL**

**HON. WILLIAM ALSUP**

12  
13  
14 Based upon the Parties' Joint Stipulation, and good cause, this Court hereby  
15 orders this Action to be, and is, dismissed with prejudice. Each party to bear their  
16 own attorneys' fees and costs.

17  
18 **IT IS SO ORDERED.**

19  
20  
21 Dated: March 14, 2016.

  
\_\_\_\_\_  
HON. WILLIAM ALSUP  
U.S. DISTRICT JUDGE