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 8 **UNITED STATES DISTRICT COURT**
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 10 **NORTHERN DISTRICT OF CALIFORNIA**

11 IRMA RAMIREZ, <i>et al.</i> ,)	CASE NO. 3:15-cv-03808-EMC
12 Plaintiff,)	STIPULATION OF DISMISSAL AND
13 v.)	
14 APENA CORP., <i>et al.</i> ,)	
15 Defendants.)	
16)	
17)	[PROPOSED] ORDER THEREON

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

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

24 The parties further consent to and request that the Court retain jurisdiction over
25 enforcement of the Agreement. *See Kokkonen v. Guardian Life Ins. Co.*, 511 U.S. 375
26 (1994) (empowering the district courts to retain jurisdiction over enforcement of settlement
27 agreements).

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STIPULATION OF DISMISSAL AND [PROPOSED] ORDER

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Respectfully Submitted,

Dated: January 30, 2017

THOMAS E. FRANKOVICH, APLC
A PROFESSIONAL LAW CORPORATION

By: /s/ Thomas E. Frankovich
Thomas E. Frankovich
Attorneys for Plaintiff

Dated: January 30, 2017

MARVIN PEDERSON, ATTORNEY AT LAW

By: /s/ Marvin Pederson
Marvin Pederson
Attorney for Defendant Apena Corp.

Dated: January 30, 2017

VAN DE PEOL, LEVY, ALLEN & ARNEAL, LLP

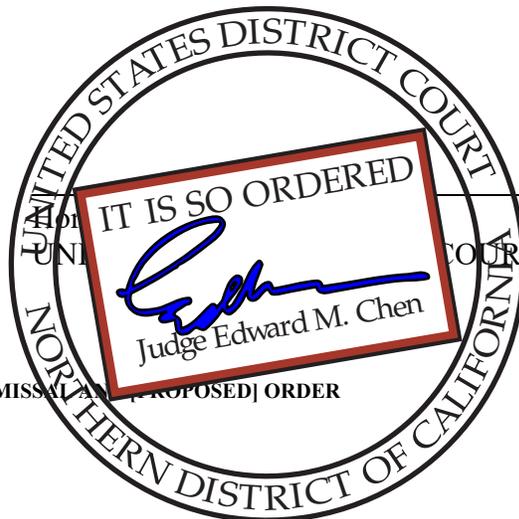
By: /s/ Nicolet E. Corliss
Nicolet E. Corliss
Attorneys for Defendants Demetrios Giannis and
Rose Giannis

ORDER

IT IS HEREBY ORDERED that this matter is dismissed with prejudice pursuant to Fed.R.Civ.P.41(a)(2) and each side is to bear its own costs and attorneys' fees.

IT IS FURTHER ORDERED that the Court shall retain jurisdiction for the purpose of enforcing the parties' Settlement Agreement and General Release should such enforcement be necessary.

Dated: 2 / 2, 2017



COURT JUDGE