

1 Steven F. Napolitano (pro hac vice)
 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
 2 Four Times Square
 New York, New York 10036
 3 Telephone: (212) 735-3000
 steven.napolitano@skadden.com

4
 5 David R. Pehlke (pro hac vice)
 Skadden, Arps, Slate, Meagher & Flom LLP
 1440 New York Avenue, N. W.
 6 Washington, DC 20005
 Telephone: (207) 371-7000
 7 david.pehlke@skadden.com

8 James P. Schaefer (SB No. 250417)
 Skadden, Arps, Slate, Meagher & Flom LLP
 9 525 University Avenue, Suite 1100
 Palo Alto, California 94301
 10 Telephone: (650) 470-4500
 james.schaefer@skadden.com

11 Attorneys for Defendant

12 **UNITED STATES DISTRICT COURT**
 13 **NORTHERN DISTRICT OF CALIFORNIA**
 14 **SAN FRANCISCO DIVISION**

15 CARR CLIFTON,
 16
 Plaintiff,
 17
 v.
 18
 HOUGHTON MIFFLIN HARCOURT
 19 PUBLISHING COMPANY,
 20
 Defendant.

Case No: 3:15-cv-03985-LB

**STIPULATION FOR DISMISSAL
 WITH PREJUDICE : ORDER**

21
 22
 23 Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff Carr
 24 Clifton (“Plaintiff”) and Defendant Houghton Mifflin Harcourt Publishing Company
 25 (“Defendant”), by their respective counsel, hereby stipulate that all claims by Plaintiff against
 26 Defendant be dismissed with prejudice, with each party to bear his or its own attorneys’ fees and
 27 costs.

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

RESPECTFULLY SUBMITTED this 7th day of April, 2016.

By: /s/ Steven F. Napolitano
Steven F. Napolitano
SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP
Four Times Square
New York, NY 10036

David R. Pehlke
SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP
1440 New York Avenue, N. W.
Washington, DC 20005

James P. Schaefer
SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP
525 University Avenue, Suite 1400
Palo Alto, CA 94301

Attorneys for Defendant

/s/Christopher Seidman
Christopher Seidman
HARMON & SEIDMAN LLC
101 South Third Street, Suite 265
Grand Junction, CO 81501
Tel: 970.245.9075
Fax: 970.245.8086
Email: chris@harmonseidman.com

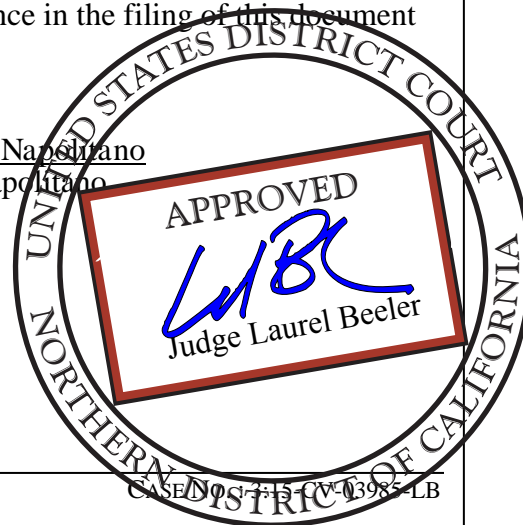
Amanda L. Bruss
HARMON & SEIDMAN LLC
12354 East Bates Circle
Aurora, CO 80014
Tel: 415.271.5754
Email: amanda@harmonseidman.com

Attorneys for Plaintiff

Pursuant to Civil Local Rule 5-1(i), the filer attests that concurrence in the filing of this document has been obtained from the signatories above.

Dated: April 8, 2016

/s/ Steven F. Napolitano
Steven F. Napolitano



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

CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2016, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent by operation of the court’s electronic filing system to all parties indicated on the electronic filing receipt.

By: /s/ Steven F. Napolitano