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8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

12 JAMES SELVITELLA,
 13 Plaintiff,
 14 v.

Case No. CV-15-4096-MMC

STIPULATED REQUEST FOR DISMISSAL
AND [~~PROPOSED~~] ORDER

16 UNITED STATES OF AMERICA,
 17 Defendant.

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19 It is hereby Stipulated and Agreed by the parties herein as follows:

20 1. The parties hereto, through their respective counsel, are advising this Court that they are
 21 in the process of negotiating a resolution of this action.

22 2. The terms of the contemplated resolution will involve consideration that can take up to
 23 120 days to complete.

24 3. Accordingly, the parties request that this action be dismissed with prejudice and that all
 25 dates be vacated provided, however, that if either party certifies to this Court, with a proof of service of
 26 a copy on opposing counsel, within 120 days from the date of the Order of Dismissal, that the
 27 contemplated resolution has not been reached or that the agreed consideration has not been delivered
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1 over, that the Order of Dismissal shall stand vacated, and the action be restored to the calendar to be set
2 for a case management conference.

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4 SO STIPULATED

BRIAN J. STRETCH
Acting United States Attorney

6 /s/ Cynthia Stier
7 CYNTHIA STIER
8 Assistant United States Attorney

9 _____/s/_____
10 JON D. FELDHAMMER
11 Attorney for Plaintiff

12 SO ORDERED this 12th day of Feb., 2016.

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15 MARLENE M. CHESNEY
16 UNITED STATES DISTRICT JUDGE
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