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11 Attorneys for Plaintiff  
 12 ROBIN EARLE

13 **UNITED STATES DISTRICT COURT**  
 14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

16 ROBIN EARLE,  
 17 Plaintiff,

18 vs.

19 SMITH & NEPHEW, INC. and DOES 1  
 20 through 10, inclusive,  
 21 Defendants.

Case No.: 3:15-cv-04253-EMC  
 [Action Filed: September 18, 2015]

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER FOR  
 DISMISSAL OF PLAINTIFFS'  
 COMPLAINT WITH PREJUDICE**

**Judge:** Honorable Edward M. Chen

23 **JOINT STIPULATION OF DISMISSAL**

24 Pursuant to *Federal Rule of Civil Procedure* 41(a)(1)(A)(ii), the parties to  
 25 this action, acting though counsel, hereby stipulate and agree that plaintiff will

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1 dismiss her Complaint against defendant Smith & Nephew, Inc., with prejudice.  
2 Each party to bear its own attorneys' fees and costs.

3  
4 Dated: September 7, 2016

SHAW, KOEPKE & SATTER

5  
6 By: 

JOHN W. SHAW  
LISA A. SATTER  
Attorneys for Defendant,  
OASIS-CALIFORNIA, INC.

7  
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9  
10 Dated: September 6, 2016

ARIAS, SANGUINETTI, STAHL &  
TORRIJOS

11  
12  
13 By: 

MICKEL M. ARIAS  
Attorneys for Plaintiff  
ROBIN EARLE

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16 ~~PROPOSED~~ ORDER OF DISMISSAL

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18 The parties' joint stipulation and [proposed] order for dismissal of plaintiff's  
19 Complaint with prejudice is approved. All of plaintiff's claims and any counter-  
20 claims are hereby dismissed with prejudice.

21  
22 Date: 9/9/2016

  
\_\_\_\_\_  
JUDGE OF THE UNITED STATES  
DISTRICT COURT

**SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing of this document.

Dated: September 7, 2016

SHAW, KOEPKE & SATTER

By: 

JOHN W. SHAW  
LISA A. SATTER  
Attorneys for Defendant,  
**SMITH & NEPHEW, INC.**

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1 **CERTIFICATE OF SERVICE**  
2 *Robin Earle v. Smith & Nephew, Inc., et al.*  
3 **U.S. District Court No. 3:15-cv-04253-EDL**

4 I, the undersigned, an employee of Shaw, Koepke & Satter, located at 23326  
5 Hawthorne Boulevard, Suite 320, Torrance, California, 90505 declare under penalty of  
6 perjury that I am over the age of eighteen (18) and not a party to this matter, action or  
7 proceeding.

8 On September 7, 2016, I served the foregoing document, described as **JOINT**  
9 **STIPULATION AND [PROPOSED] ORDER FOR DISMISSAL OF**  
10 **PLAINTIFFS' COMPLAINT WITH PREJUDICE** in this action by placing

11  the original of the document  true copies of the document

12 in separate sealed envelopes addressed to the following party(ies) in this matter at the  
13 following address(es):

14 Mike Arias  
15 [mike@asstlawyers.com](mailto:mike@asstlawyers.com)

16 Arnold C. Wang

17 [Arnold@asstlawyers.com](mailto:Arnold@asstlawyers.com)

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Attorneys for Plaintiff

Robin Earle

24  **BY U.S. MAIL** I deposited such envelope in the mail at Los Angeles, California.  
25 The envelopes were mailed with postage thereon fully prepaid.

26 I am readily familiar with Shaw, Koepke & Satter's practice of collection and  
27 processing correspondence for mailing. Under that practice, documents are deposited  
28 with the U.S. Postal Service on the same day which is stated in the proof of service,  
with postage fully prepaid at Los Angeles, California in the ordinary course of  
business. I am aware that on motion of party served, service is presumed invalid if the  
postal cancellation date or postage meter date is more than one day after the date stated  
in this proof of service.

29  **BY ELECTRONIC FILING AND/OR SERVICE** Submitting an electronic  
30 version of the document(s) via file transfer protocol (FTP) to ECF (Electronic Case  
31 Filing), which sent notification of that filing to the persons listed above.

32  **BY FACSIMILE** I caused the above-referenced document to be transmitted via  
33 facsimile to the parties as listed on this Proof of Service.

34  **FEDERAL** I declare that I am employed in the office of a member of the bar of this  
35 court at whose direction the service was made

36 Executed on September 7, 2016 at Torrance, California.

37   
38 Maria Nixon