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5 Counsel for Plaintiff  
**GAIL MORALES**

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10 GAIL MORALES,

Case No. 15-CV-4383-CRB

11 Plaintiff,

**STIPULATION FOR DISMISSAL OF CERTAIN  
INDIVIDUAL DEFENDANTS DONALD CRANE,  
DAVID LANSKY, AND DAVID JOYNER,  
WITHOUT PREJUDICE**

12 v.

13 CAL ECONNECT, INC., et al.,

**ORDER**

14 Defendants.

15 \_\_\_\_\_/ [Jury Trial Demanded]

16 THE PARTIES HERETO, THROUGH COUNSEL OF RECORD, HEREBY AGREE AND  
17 STIPULATE AS FOLLOWS:

18 This is an employment-related case filed in State Court by Plaintiff Gail Morales on  
19 September 2, 2014.

20 All named Defendants joined in and consented to removal of the action pursuant to 28  
21 USC section 1446(b)(2), and this action was removed to federal court on September 24, 2015.

22 The parties hereto, through counsel of record, hereby stipulate pursuant to Federal  
23 Rules of Civil Procedure, Rule 41(a), that the following named defendants shall be dismissed  
24 without prejudice: Donald Crane, David Lansky, and David Joyner.

25 Each party to this stipulation agrees that in exchange for dismissal, each shall bear  
26 his/her own costs of suit and attorneys' fees expended as to the dismissed defendants, only;  
27 and, that each of the dismissed defendants will appear at deposition pursuant to reasonable  
28 notice and without the need to subpoena or to pay a witness fee, on dates, and at times and

1 places mutually agreed upon. The location of these depositions will be pursuant to Federal  
2 Rules of Civil Procedure, Rule 45.

3 After dismissal of these three defendants, the named parties remaining are Plaintiff Gail  
4 Morales and Defendants Cal eConnect, Inc., and Laura Landry.

5  
6 Date: September \_\_, 2015

/s/ Russell A. Robinson  
By: Russell A. Robinson  
Law Office of Russell A. Robinson  
Counsel for Plaintiff  
**GAIL MORALES**

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10 Date: September \_\_, 2015

/s/  
By: Lauren M. Cooper, Esq.  
Villarreal Hutner PC  
Counsel for Defendants  
CAL eCONNECT, INC., LAURA LANDRY,  
DONALD CRANE, DAVID LANSKY, and  
DAVID JOYNER

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1 **ORDER**

2 Good cause appearing, the Court hereby orders as follows:

3 The parties' stipulation is hereby adopted as the Order of this Court. Pursuant to  
4 Federal Rules of Civil Procedure, Rule 41(a), Defendants Donald Crane, David Lansky, and  
5 David Joyner shall be and are hereby dismissed from this action, without prejudice: .

6 Each party to this stipulation shall bear his/her own costs of suit and attorneys' fees  
7 expended as to the dismissed defendants, only; and, each of the dismissed defendants will  
8 appear at deposition pursuant to reasonable notice to defense counsel and without the need to  
9 subpoena or to pay a witness fee, on dates, and at times and places mutually agreed upon.

10 The location of these depositions will be pursuant to Federal Rules of Civil Procedure, Rule 45.

11 **IT IS SO ORDERED.**

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14 Date: October 6, 2015

  
HONORABLE CHARLES R. BREYER  
Judge, United States District Court