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8 Attorneys for Defendants
CITY OF CONCORD, CONCORD POLICE DEPARTMENT
9 OFFICERS ANTHONY ZALEC, JEFFREY BILODEAU,
ZERINA REDZIC, and MICHAEL KINDORF

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12
13 SAMUEL BOGUT,
14 Plaintiff,
15 vs.
16 CITY OF CONCORD, a municipal
corporation; Concord Police Department
17 Officers ANTHONY ZALEC, Individually,
JEFFREY BILODEAU, Individually,
18 ZERINA REDZIC, Individually,
MICHAEL KINDORF, Individually, and
19 DOES 1 THROUGH 50, Jointly and
Severally,
20 Defendants.

Case No. C15-04572 WHO

**STIPULATION AND ~~PROPOSED~~
ORDER TO DISMISS ENTIRE ACTION,
WITH PREJUDICE PER RULE 41(A)(2)
OF THE FEDERAL RULES OF CIVIL
PROCEDURE**

22 The parties, by and through their respective attorneys of record, hereby stipulate and
23 jointly request an Order from the Court dismissing this entire action, with prejudice, in light of
24 the Rule 68 Judgment and settlement of the concomitant fees and costs in this action.

25 WHEREAS, Plaintiff hereby agrees to voluntarily dismiss, with prejudice, all of his
26 claims for damages against all Defendants, as alleged in Plaintiff's Complaint, filed in this matter.
27 This dismissal would be a dismissal of the entire action, against all parties, with prejudice.
28

STIPULATION AND ORDER TO DISMISS
ENTIRE ACTION, WITH PREJUDICE PER
FRCP 41(A)(2) – C15-04572 WHO

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WHEREAS, each party agrees to bear its own fees and costs as to this dismissal.

The parties attest that concurrence in the filing of these documents has been obtained from each of the other Signatories, which shall serve in lieu of their signatures on the document.

SO STIPULATED.

Dated: March 22, 2016

LAW OFFICES OF SANJAY S. SCHMIDT
LAW OFFICES OF PANOS LAGOS

By: /s/ Schmidt, Sanjay
Sanjay S. Schmidt / Panos Lagos
Attorneys for Plaintiff
SAMUEL BOGUT

Dated: March 22, 2016

McNAMARA, NEY, BEATTY, SLATTERY,
BORGES & AMBACHER LLP

By: /s/ Blechman, Noah
James V. Fitzgerald, III
Noah G. Blechman
Elizabeth M. Dooley
Attorneys for Defendants
CITY OF CONCORD, CONCORD POLICE
DEPARTMENT OFFICERS ANTHONY ZALEC,
JEFFREY BILODEAU, ZERINA REDZIC, and
MICHAEL KINDORF

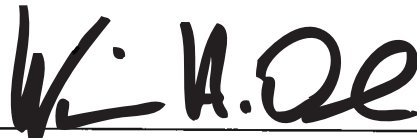
ORDER

PURSUANT TO STIPULATION AND REQUEST, IT IS ORDERED AS FOLLOWS:

The Court hereby dismisses this entire action, as to all claims and all Defendants, with prejudice. Each party bears its own fees and costs as to this dismissal.

IT IS SO ORDERED

Dated: March 23, 2016



Hon. William H. Orrick
United States District Judge