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Attorneys for Defendant  
 RAJIV MALHAN

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

H.P.D. CONSOLIDATION, INC. DBA  
 VALLEY WINE WAREHOUSE,

Plaintiff,

v.

JOSE PINA aka JOSE LUIS PIEDRA, et al.

Defendants.

Cause No. 3:15-cv-05309 EMC

STIPULATION & [PROPOSED] ORDER  
 OF DISMISSAL WITHOUT PREJUDICE

(as to Defendant Rajiv Malhan only)

1           **TO THE COURT, AND TO ALL INTERESTED PARTIES AND THEIR**  
2 **ATTORNEYS OF RECORD:**

3           Plaintiff H.P.D. Consolidation, Inc. (Plaintiff) and Defendant Rajiv Malhan (Defendant  
4 Malhan), by and through their respective counsel of record, hereby stipulate pursuant to Rule  
5 41(a)(2) of the Federal Rules of Civil Procedure that Defendant Rajiv Malhan shall be dismissed  
6 without prejudice.

7 Dated: March 22, 2016

**MOTSCHIEDLER, MICHAELIDES, WISHON  
8 BREWER & RYAN, LLP**

9 By: /s/ Russell K. Ryan  
10 RUSSELL K. RYAN  
Attorneys for Plaintiff H.P.D. Consolidation, Inc.

11 Dated: March 22, 2016

**KING & SPALDING LLP**

12 By: /s/ Nicholas A. Oldham  
13 NICHOLAS A. OLDHAM  
14 JULIE A. STOCKTON  
Attorneys for Defendant Rajiv Malhan

15 Dated: March 22, 2016

**WALKER HEYE MEEHAN & EISINGER, PLLC**

16 By: /s/ Shea C. Meehan  
17 SHEA C. MEEHAN  
18 BRET UHRICH  
Attorneys for Defendant Rajiv Malhan

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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that Defendant Rajiv Malhan is dismissed without prejudice.

Dated: March 23, 2016

By: \_\_\_\_\_



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**ATTESTATION OF CONCURRENCE**

I, Shea C. Meehan, attest that I am one of the attorneys for Defendant Malhan. As the ECF user and filer of this document, I attest that concurrence in the filing of this document has been obtained from its signatories.

Dated: March 22, 2016

By: /s/ Shea C. Meehan  
SHEA C. MEEHAN  
BRET UHRICH  
Attorneys for Defendant Rajiv Malhan

1  
2 **CERTIFICATE OF SERVICE**

3 The undersigned counsel for Defendant Malhan hereby certifies that a true and correct  
4 copy of the foregoing document was filed with the Court and served electronically through the  
5 CM-ECF (electronic case filing) system to all counsel of record to those registered to receive a  
6 Notice of Electronic Filing for this case on March 22, 2016.

7  
8 Dated: March 22, 2016

By: /s/ Shea C. Meehan  
SHEA C. MEEHAN  
BRET UHRICH  
Attorneys for Defendant Rajiv Malhan