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JOINT NOTICE OF SETTLEMENT

TO THIS HONORABLE COURT AND TO ALL PARTIES AND THEIR
ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that the above captioned parties have entered into a
settlement of this matter on 30 March 2017. This settlement includes all parties and all
causes of action.

The Settlement will be concluded within 45 days.

REQUEST FOR CONDITIONAL DISMISSAL

The parties request that the Court Order this case conditionally dismissed for 45
days from 4 April 2017 to 19 May 2017 in order to provide time for the parties to execute
their release, fund the settlement and to conserve judicial resources.

The parties acknowledge the filing of a litigation lien at ECF 44 from nonparty
Mark Savage, through his California counsel Jeffrey A. Moss, Esq., and submit a joint
letter addressing the lien issue at the same time as filing this Notice of Settlement.

The parties request all calendared dates be vacated.

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1 The parties agree and request that if any party hereto certifies to this Court by 19
2 May 2017 (the first Court day following the expiration of 45 days from the date of this
3 filing), that the agreed consideration for said Settlement has not been delivered over or
4 the release signed, the Conditional Dismissal Order shall stand vacated and this action
5 shall forthwith be restored to the Calendar to be set for trial.
6

7 **JOHN H. CIGAVIC III, ESQ.**
8 **(ATTORNEY – BASIC LEGAL SERVICES)**

8 Dated: 4 April 2017

9 By: /s/ John H. Cigavic III

10 **JOHN H. CIGAVIC III, ESQ.**
11 **Attorney for Plaintiff Colette Savage**

12 Dated: April 4, 2017

13 **SEAN P. WORSEY**
14 **LEVIN SIMES LLP**

14 By: /s/ Sean P. Worsley

15 **SEAN P. WORSEY**
16 **Attorney for Defendants Steven Sommer, Joshua**
17 **Sommer, Amie Summers, Stephanie Sommer,**
18 **Richard Ganz, Lynn Ganz, Jerry Piel & Jordonna**
19 **Piel**

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PROPOSED ORDER

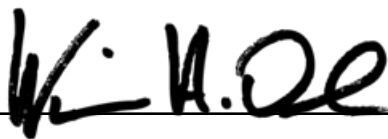
The Parties hereto, by their counsel, have advised the Court that they have agreed to a settlement of this action.

IT IS HEREBY ORDERED that this action is dismissed with prejudice; provided, however, that if any party hereto shall certify to this Court, with a proof of service of a copy on opposing counsel on or before 19 May 2017 that the agreed consideration for the settlement has not been delivered over or the release signed; this Order shall stand vacated, and the action shall be restored to the calendar to be set for trial.

IT IS SO ORDERED.

Dated: April 5, 2017

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

By: 

**WILLIAM H. ORRICK
DISTRICT COURT JUDGE**

Approved as to Form:

Dated: 4 April 2017

**JOHN H. CIGAVIC III, ESQ.
(ATTORNEY – BASIC LEGAL SERVICES)**

By: /s/ John H. Cigavic III

**JOHN H. CIGAVIC III, ESQ.
Attorney for Plaintiff Colette Savage**

Dated: April 4, 2017

**SEAN P. WORSEY
LEVIN SIMES LLP**

By: /s/ Sean P. Worsley

**SEAN P. WORSEY
Attorney for Defendants Steven Sommer, Joshua
Sommer, Amie Summers, Stephanie Sommer,
Richard Ganz, Lynn Ganz, Jerry Piel & Jordonna
Piel**