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23 AMAZON.COM, INC., GOLDEN STATE  
24 FC, LLC

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

27 DAVID PARSON and BRANDON  
 MITCHELL, individually and on behalf of all  
 those similarly situated, and MARIAH  
 GULLAT as an individual,

Plaintiffs,

vs.

GOLDEN STATE FC LLC, AMAZON.COM,  
 INC., TRUEBLUE INC, SMX, and DOES 1  
 through 25, inclusive,

Defendants.

Case No.: 3:16-cv-00405-JST

STIPULATION TO DISMISS COMPLAINT  
WITH PREJUDICE and ~~Proposed~~ ORDER

Judge: Honorable Jon S. Tigar

**STIPULATION**

1                   Following informal discovery, the parties, by and through their attorneys of record,  
2 hereby stipulate to the following:

3                   WHEREAS, after informal discovery, including Plaintiffs' counsel's visit to the  
4 fulfillment center in which Plaintiffs currently work or formerly worked, Plaintiffs have decided  
5 to withdraw this action.

6                   ACCORDINGLY, IT IS HEREBY STIPULATED AND REQUESTED by and between  
7 the parties in this action that:

- 8                   1. All of Plaintiffs' claims in this matter be dismissed with prejudice and without costs and
- 9                   attorneys' fees to any party;
- 10                  2. Plaintiffs agree not to assert claims in the future that are based on the specific factual
- 11                  allegations raised in the Complaint and/or First Amended Complaint in this matter; and
- 12                  3. Notwithstanding the foregoing, Plaintiffs are not precluded from recovering from or
- 13                  participating in other class action cases that are certified as absent class members, but not
- 14                  as named plaintiffs or class representatives. This includes but is not limited to any
- 15                  recovery associated with MDL Docket No. 2504, Master File 3:14-md-2504, Case No.
- 16                  3:14-cv-290-DJH (*Saldana et al v Amazon.com et al.*)

**IT IS SO STIPULATED:**

18 Dated: June 27, 2016  
19 CLAYEO C. ARNOLD, APC  
20 By: /s/ Joshua H. Watson  
21 JOSHUA H. WATSON  
22 Attorneys for Plaintiffs David Parson;  
Branden Mitchell; Mariah Gullat

Dated: June 27, 2016  
ONGARO, PC  
By: /s/ David R. Ongaro  
DAVID R. ONGARO  
CARA R. SHERMAN  
Attorneys for Defendants Trueblue, Inc. &  
SMX, LLC

23 Dated: June 27, 2016

MORGAN, LEWIS & BOCKIUS, LLP  
By: /s/ Theresa Mak  
THERESA MAK  
Attorneys for Defendants Amazon.com Inc.,  
Golden State Fulfillment FC LLC

1 **ORDER**

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3 Pursuant to and subject to the terms and conditions of the forgoing stipulation, this matter

4 is hereby DISMISSED WITH PREJUDICE and without costs and attorneys' fees to any party.

5 **IT IS SO ORDERED.**

6

7 Dated: June 29, 2016

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HONORABLE JOSEPH S. TIGAR