

GEARINGER LAW GROUP

740 FOURTH STREET
SANTA ROSA, CALIFORNIA
95404

Tel. (415) 440-3102

BRIAN GEARINGER (State Bar #146125)

SCOTT LAW FIRM

1388 SUTTER STREET, SUITE 715
SAN FRANCISCO, CALIFORNIA
94109

Tel. (415) 561-9600

JOHN HOUSTON SCOTT (State Bar #72578)

LIZABETH N. DE VRIES (State Bar #227215)

Attorneys for Plaintiffs FORTUNE PLAYERS GROUP, INC.,
ANGELITA DE LOS REYES and VANESSA PARUNGAO



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

FORTUNE PLAYERS GROUP, INC.,
ANGELITA DE LOS REYES, and
VANESSA PARUNGAO

Plaintiffs,

v.

WAYNE QUINT, JR., YOLANDA
SANCHEZ, AARON WONG, MICHAEL
FANUCCHI, MARK LEGAREJOS, MICAH
SCOTT, STEVE NORRIS, HOLLY
KINNEY, ROCHELLE SHADWICK and
DOES ONE to FIFTY, inclusive.

Defendants.

Case No. C 3:16-cv-00800-TEH

**STIPULATION FOR DISMISSAL
WITHOUT PREJUDICE OF
PLAINTIFFS' CLAIMS FOR
MONETARY DAMAGES**

[F.R.C.P. Rule 41(a)(1)(A)(ii)]

Date Action Filed: February 17, 2016

Trial Date: Not set.

IT IS STIPULATED by and between all parties, through their designated counsel, as follows:

1 **STIPULATION**

2 Plaintiff Fortune Players Group, Inc., Plaintiffs Angelita De Los Reyes and Vanessa
3 Parungao (collectively "Plaintiffs") and Defendants Wayne Quint, Jr., Yolanda Sanchez, Aaron
4 Wong, Michael Fanucchi, Mark Legarejos, Micah Scott, Steve Norris, Holly Kinney, and
5 Rochelle Shadwick (collectively "Defendants") by and through their attorneys of record,
6 stipulate as follows:

7 Plaintiff Fortune Players Group, Inc. dismisses *without prejudice* all of its claims for
8 monetary damages set forth in its Fifth, Sixth, and Seventh Claims for Relief set forth in
9 Plaintiffs' February 17, 2016 Complaint.

10 Plaintiffs Angelita De Los Reyes and Vanessa Parungao dismiss *without prejudice* all of
11 their claims for monetary damages set forth in their Fifth, Sixth, Seventh and Eights Claims for
12 Relief set forth in Plaintiffs' February 17, 2016 Complaint.

13 Plaintiffs and Defendants will bear their own attorneys' fees and costs in connection with
14 this Dismissal of certain Claims for Relief *without prejudice*.

15 **IT IS SO STIPULATED**

16 Dated: May 6, 2016

GEARINGER LAW GROUP

17
18 By: /s/ Brian Gearinger
19 BRIAN GEARINGER
20 ATTORNEYS FOR PLAINTIFFS FORTUNE PLAYERS
21 GROUP, INC., ANGELITA DE LOS REYES AND
22 VANESSA PARUNGAO
23
24
25
26
27
28

1 Dated: May 6, 2016

SCOTT LAW OFFICE

2 By: /s/ John Houston Scott
3 JOHN HOUSTON SCOTT
4 ATTORNEYS FOR PLAINTIFFS FORTUNE PLAYERS
5 GROUP, INC., ANGELITA DE LOS REYES AND
6 VANESSA PARUNGAO

6 Dated: May 6, 2016

7 KAMALA D. HARRIS
8 Attorney General of California
9 SARA J. DRAKE
10 Senior Assistant Attorney General
11 PARAS HRISHIKESH MODHA
12 Deputy Attorney General
13 TIMOTHY M. MUSCAT
14 Deputy Attorney General
15 JOHN P. DEVINE
16 Supervising Deputy Attorney General
17 MICAH C. E. OSGOOD
18 Deputy Attorney General

13 BY: /s/ MICAH C. E. OSGOOD
14 ATTORNEYS FOR DEFENDANTS

15 **ATTORNEY ATTESTATION OF COMPLIANCE WITH LOCAL RULE 5-1(i)**

16 I, Brian Gearing, attest that I have the concurrence of Micah C. E. Osgood, counsel for
17 Defendants, in the filing of this Stipulation, and I will maintain records to support this
18 concurrence for subsequent production for the Court, if so ordered, or for inspection upon
19 request by a party, until one year after the final resolution of the action (including appeal, if any).

20 Dated: May 6, 2016

GEARINGER LAW GROUP

21 By: /s/ Brian Gearing
22 BRIAN GEARINGER
23 ATTORNEYS FOR PLAINTIFFS FORTUNE PLAYERS
24 GROUP, INC., ANGELITA DE LOS REYES AND
25 VANESSA PARUNGAO