1	LAW OFFICE OF IRENE KARBELASHVILI			
2	Irene Karbelashvili, State Bar Number 232223 Irakli Karbelashvili, State Bar Number 302971			
3	12 South First Street, Suite 413			
4	San Jose, CA 95113 Telephone: (408) 295-0137			
5	Fax: (408) 295-0142			
6	Attorneys for DMITRY YANUSHKEVICH, Plaintiff			
7	UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA			
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10	DMITRY YANUSHKEVICH, ) Case No. 16-cv-3019-EMC			
11	Plaintiff, ) STIPULATION AND [PROPOSED]			
12	vs. ) ORDER DISMISSING ACTION			
13	) WITH PREJUDICE  AARON BROTHERS, INC., a Delaware )			
14	corporation, d/b/a AARON BROTHERS )			
15	ART & FRAMING; ALEX DELLY, an ) (Fed. R. Civ. P. 41(a)(1)(A)(ii)) and (Fed. individual; SHARON K DELLY, an ) R. Civ. P. 41(a)(2))			
16	individual; ROBERT G BLATMAN, an )			
17	individual; and DOES 1-20 inclusive, ) Defendants. )			
18				
19				
20				
21	IT IS HEREBY STIPULATED AND AGREED between Plaintiff Dmitry Yanushkevich			
22	("Plaintiff"), Defendant Aaron Brothers, Inc., Defendant Alex Delly, Defendant Sharon K. Delly, and Defendant Robert G. Blatman (collectively, "Defendants"), that having reached a full and final			
23				
24	resolution of Plaintiff's claims, this action be dismissed with prejudice. The parties are to bear their			
	own attorneys' fees and costs. The parties also request that the Court retain jurisdiction over the			
25	enforcement of the terms of the CONFIDENTIAL SETTLEMENT AGREEMENT executed by Plaintiff and Defendants and approved by their respective attorneys.			
26	Trainers and Describer and approved by their respective autorneys.			
27				
28	IT IS SO STIPULATED.			
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1	Dated: February 16, 2017		/s/ Irene Karbelashvili Irene Karbelashvili, Attorney for	
2			Plaintiff Dmitry Yanushkevich	
3	Dated: February 21, 2017		/s/ John Bosco	
5			John Bosco, Attorney for Defendants	
6				
7	FILER'S ATTESTATION			
8	Pursuant to Local Rule 5-1, I hereby attest that I, Irene Karbelashvili, received the			
9	concurrence of counsel for Defendants in the filing of this document			
10	concurrence of counsel for Berendants in the fining of this document			
11		Rv. /	s/ Irene Karbelashvili	
12		By/	RENE KARBELASHVILI	
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Stipulation and [Proposed] Order

## [PROPOSED] ORDER

Having reviewed the above Stipulation for Dismissal with Prejudice by Plaintiff

DMITRY YANUSHKEVICH ("Plaintiff") on the one hand and Defendants AARON

BROTHERS, INC., a Delaware corporation, d/b/a AARON BROTHERS ART & FRAMING;

ALEX DELLY, an individual; SHARON K DELLY, an individual; ROBERT G BLATMAN, an individual ("Defendants") on the other hand,

## **IT IS HEREBY ORDERED** that:

- 1. This action be dismissed with prejudice.
- 2. All parties shall bear their own costs and fees in the action.
- 3. The Court retains jurisdiction over the parties' CONFIDENTIAL SETTLEMENT AGREEMENT.
- 4. The Clerk shall close the case file.

Dated:\_\_\_\_\_2/22/2017



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