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**LEONE & ALBERTS**

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11 Attorneys for Defendants  
12 PITTSBURG UNIFIED SCHOOL DISTRICT,  
13 JEFFREY VARNER, and TARA BRINKERHOFF

14 THE UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA

16 K.T, A MINOR, BY AND THROUGH  
17 HER GUARDIAN AD LITEM  
18 RACHEL TORRES; DAVID COPE  
19 and RACHEL TORRES

20 Plaintiffs,

21 vs.

22 PITTSBURG UNIFIED SCHOOL  
23 DISTRICT; GLORIA JOSEPH;  
24 JEFFREY VARNER; AND TARA  
25 BRINKERHOFF,

26 Defendants.

**Case No.: 3:16-cv-03314 CRB**

**STIPULATION AND ~~[PROPOSED]~~  
ORDER RE DISMISSAL WITH  
PREJUDICE OF ENTIRE ACTION**

27 **IT IS HEREBY STIPULATED** between plaintiffs, K.T. a minor, by and through  
28 her GUARDIAN AD LITEM RACHEL TORRES; DAVID COPE and RACHEL  
TORRES and defendant, Pittsburg Unified School District, by and through its  
counsel of record, that the above-referenced action should be dismissed with  
prejudice pursuant to F.R.C.P. 41. The parties further stipulate that each party shall  
bear their own attorney's fees, expenses and costs.

1 The parties, by and through their counsel of record, also stipulate that all claims  
2 as against Defendants, GLORIA JOSEPH; JEFFREY VARNER; AND TARA  
3 BRINKERHOFF, be hereby dismissed with prejudice in exchange for said defendants  
4 waiving of costs and attorney fees as against the plaintiffs. Said parties further stipulate  
5 to waive costs and fees as against each other.

6 Dated: March 19, 2018

LAW OFFICES OF TODD BOLEY

  
TODD BOLEY, ESQ.  
Attorneys for Plaintiffs

11 Dated: March \_\_, 2018

LAW OFFICES OF PETER ALFERT

  
PETER ALFERT, ESQ.  
Attorneys for Plaintiffs

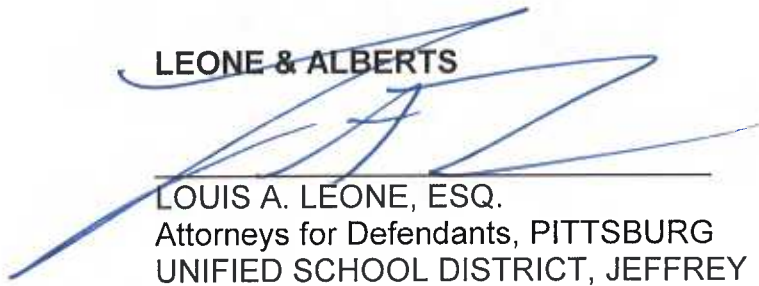
16 Dated: March \_\_, 2018

DAVIS & YOUNG

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ADAM DAVIS, ESQ.  
Attorneys for Defendant, Gloria Joseph

21 Dated: March 19, 2018

LEONE & ALBERTS

  
LOUIS A. LEONE, ESQ.  
Attorneys for Defendants, PITTSBURG  
UNIFIED SCHOOL DISTRICT, JEFFREY  
VARNER, and TARA BRINKERHOFF

26 IT IS SO ORDERED:

27 Dated: \_\_\_\_\_

\_\_\_\_\_  
UNITED STATES DISTRICT COURT  
JUDGE CHARLES R. BRYER

1 The parties, by and through their counsel of record, also stipulate that all claims  
2 as against Defendants, GLORIA JOSEPH; JEFFREY VARNER; AND TARA  
3 BRINKERHOFF, be hereby dismissed with prejudice in exchange for said defendants  
4 waiving of costs and attorney fees as against the plaintiffs. Said parties further stipulate  
5 to waive costs and fees as against each other.

6  
7 Dated: March\_\_\_\_, 2018

**LAW OFFICES OF TODD BOLEY**

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9 \_\_\_\_\_  
TODD BOLEY, ESQ.  
Attorneys for Plaintiffs

10  
11 Dated: March\_\_\_\_, 2018

**LAW OFFICES OF PETER ALFERT**

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PETER ALFERT, ESQ.  
Attorneys for Plaintiffs

14  
15  
16 Dated: March 16, 2018

**DAVIS & YOUNG**

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ADAM DAVIS, ESQ.  
Attorneys for Defendant, Gloria Joseph

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20  
21 Dated: March\_\_\_\_, 2018

**LEONE & ALBERTS**

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23 \_\_\_\_\_  
LOUIS A. LEONE, ESQ.  
Attorneys for Defendants, PITTSBURG  
24 UNIFIED SCHOOL DISTRICT, JEFFREY  
25 VARNER, and TARA BRINKERHOFF

26 **IT IS SO ORDERED:**

27 Dated: March 20, 2018

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UNITED STATES DISTRICT COURT  
JUDGE CHARLES R. BRYER