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9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA — SAN FRANCISCO DIVISION

11
 12 RHODORA CRISTOBAL,
 13 Plaintiff,
 14 vs.
 15 EQUIFAX, INC.; et. al.,
 16 Defendants.

Federal Case No.: 3:16-cv-06329-JST

**STIPULATION OF DISMISSAL WITH
 PREJUDICE OF DEFENDANT
 JPMORGAN CHASE BANK, N.A.;
 [PROPOSED] ORDER**

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 18 IT IS HEREBY STIPULATED by and between plaintiff Rhodora Cristobal and
 19 defendant Chase Bank USA, N.A. (erroneously sued as JPMorgan Chase Bank, N.A., and
 20 referred to herein as “Chase”), through their designated counsel, that Chase be dismissed with
 21 prejudice from the above-captioned action pursuant to Federal Rules of Civil Procedure, Rule
 22 41(a)(2). As a condition of entering into this stipulation, Chase is reserving its rights to file,
 23 within 30 days from the date of this stipulation, a motion to recover its attorneys’ fees and costs
 24 incurred in connection with its defense of this action.

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DATED: October 9, 2017

Sagaria Law, P.C.

By: /s/ Elliot W. Gale
Elliot W. Gale

Attorneys for Plaintiff
Rhodora Cristobal

DATED: October 9, 2017

Covington and Burling LLP

By: /s/Megan Rodgers
Megan Rodgers

Attorneys for Defendant
Chase Bank USA, N.A. (erroneously sued as JPMorgan
Chase Bank, N.A.)

I, Elliot Gale, am the ECF user whose identification and password are being used to file this
Stipulation. I hereby attest that Megan Rodgers has concurred in this filing.
/s/ Elliot Gale

~~PROPOSED~~ ORDER

Pursuant to the stipulation of the Parties, Chase is dismissed with prejudice from the
above-captioned action.

IT IS SO ORDERED.

DATED: October 10, 2017



JON S. TIGAR
UNITED STATES DISTRICT JUDGE