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11 UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
13

14 PHALKUN BUN HEANG

15 Plaintiff,

16 vs.

17 DEP'T OF HOMELAND SECURITY,

18 Defendant.
19

Case No.: CV-16-06304 JCS

STIPULATION OF DISMISSAL
[FRCP 41(a)(1)(A)(ii)]

20 Plaintiff PHALKUN BUN HEANG, and Defendant DEPARTMENT OF HOMELAND
21 SECURITY, pursuant to Rule of Civil Procedure 41(a)(1)(A)(ii), and the Settlement Agreement
22 filed November 3, 2017 (Docket No. 38-1), hereby file this Stipulation for Dismissal. The
23 Complaint is dismissed in its entirety with prejudice. The Court shall retain jurisdiction for the
24 purposes of enforcing the settlement agreement and protective order in this case (see Docket
25 Nos. 38 and 39).

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1 Dated: January 24, 2018

2 Ibarra Professional Law Corporation

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4 /s/ Crisostomo G. Ibarra
5 By: Crisostomo G. Ibarra
6 Attorneys for Plaintiff
7 PHALKUN BUN HEANG

8 Dated: January 24, 2018

9
10 /s/ David A. Pereda
11 By: David A. Pereda
12 Assistant United States Attorney
13 Attorneys for Defendant
14 DEP'T OF HOMELAND SECURITY

15 Dated: January 25, 2018

