

1 RANDALL W. EDWARDS (S.B. #179053)
 redwards@omm.com
 2 O'MELVENY & MYERS LLP
 Two Embarcadero Center, 28th Floor
 3 San Francisco, CA 94111-3823
 Telephone: (415) 984-8700
 4 Facsimile: (415) 984-8701
 5 Attorneys for Defendant
 SAMSUNG ELECTRONICS AMERICA, INC.

6 MICHAEL F. RAM (S.B. #104805)
 MRam@RobinsKaplan.com
 7 ROBINS KAPLAN LLP
 2440 West El Camino Real, Suite 100
 8 Mountain View, CA 94040
 Telephone: (650) 784-4040
 9 Facsimile: (650) 784-4041
 10 Attorneys for Plaintiff
 11 VICTORIA TULIPANI

12 **UNITED STATES DISTRICT COURT**
 13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 14 **SAN FRANCISCO DIVISION**

16 VICTORIA TULIPANI, On Behalf Of
 Herself And All Others Similarly Situated,

17 Plaintiff,

18 v.

19
 20 SAMSUNG ELECTRONICS AMERICA,
 INC. and DOES ONE through ONE
 21 HUNDRED, inclusive,

22 Defendants.

Case No. 17-CV-513-LB

**STIPULATION AND ~~PROPOSED~~
 ORDER OF DISMISSAL**

Complaint Filed: February 1, 2017

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I. STIPULATION

After engaging in discovery and negotiation, Plaintiff Victoria Tulipani (hereinafter, “Plaintiff”) and Defendant Samsung Electronics America, Inc. (hereinafter, “Defendant”) have reached an individual settlement that will not require class certification or court approval of settlement.

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiff and Defendant, by and through their attorneys of record, therefore hereby stipulate to dismissal of any and all of Plaintiff’s individual claims against Defendant, and stipulate to the proposed order attached hereto. This dismissal is without prejudice to any claims of the putative class members other than Plaintiff.

STIPULATED TO, AND DATED AND RESPECTFULLY SUBMITTED this 10th day of July, 2017.

By: /s/ Michael F. Ram
MICHAEL F. RAM (SBN 104805)
mram@robinskaplan.com
ROBINS KAPLAN LLP
2440 West El Camino Real, Suite 100
Mountain View, CA 94040
Telephone: (650) 784-4040
Facsimile: (650) 784-4041

By: /s/ Randall W. Edwards
RANDALL W. EDWARDS (SBN 179053)
redwards@omm.com
O’MELVENY & MYERS LLP
Two Embarcadero Center, 28th Floor
San Francisco, CA 94111-3823
Telephone: (415) 984-8700
Facsimile: (415) 984-8701

Attorneys for Plaintiff

Attorneys for Defendant

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II. LOCAL RULE 5-1(I)(3) STATEMENT

Pursuant to Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from counsel for all parties, and that I will maintain records to support this concurrence by all counsel subject to this stipulation as required under the local rules.

Dated: July 10, 2017

By: /s/ Michael F. Ram
MICHAEL F. RAM (SBN 104805)
mram@robinskaplan.com
ROBINS KAPLAN LLP
2440 West El Camino Real, Suite 100
Mountain View, CA 94040
Telephone: (650) 784-4040
Facsimile: (650) 784-4041

Attorneys for Plaintiff

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III. ~~PROPOSED~~ ORDER PURSUANT TO STIPULATION

This matter came before the above-entitled Court on the parties’ stipulation for dismissal with prejudice. After reviewing the files and records herein, and the Court having been fully advised, it is hereby:

ORDERED that Plaintiff’s individual claims against Defendant are DISMISSED WITH PREJUDICE with each party to bear their own attorneys’ fees, costs and expenses except as may be otherwise agreed to by the parties. This dismissal is without prejudice to any putative class claims.

IT IS SO ORDERED this 11th day of July, 2017



The Hon. Laurel Beeler
UNITED STATES DISTRICT JUDGE