

1 ALBERT G. STOLL, JR., ESQ. SBN 164649  
 ALBERT G. STOLL, JR | A LAW CORPORATION  
 2 235 Montgomery Street, Suite 1220  
 San Francisco, CA, 94104  
 3 TELEPHONE: (415) 576-1500  
 FACSIMILE: (415) 576-1501  
 4 EMAIL: [astoll@stoll-law.com](mailto:astoll@stoll-law.com)

5 Attorney for Plaintiff Nichole Beard

6 DAVID L. ANDERSON (CABN 149604)  
 United States Attorney  
 7 SARA WINSLOW (DCBN 457643)  
 Chief, Civil Division  
 8 NEILL T. TSENG (CABN 220348)  
 ADRIENNE ZACK (CABN 291629)  
 9 Assistant United States Attorneys

10 450 Golden Gate Avenue, Box 36055  
 San Francisco, California 94102-3495  
 11 Telephone: (415) 436-7155  
 FAX: (415) 436-6748  
 12 [neill.tseng@usdoj.gov](mailto:neill.tseng@usdoj.gov)

13 Attorneys for Defendant USA

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
 16 SAN FRANCISCO DIVISION

17 NICHOLE LYNN BEARD,	)	CASE NO. C 17-3218 JCS
18 Plaintiff,	)	
19 v.	)	<b>STIPULATION OF DISMISSAL WITH</b>
20 UNITED STATES OF AMERICA,	)	<b>PREJUDICE</b>
21 Defendant.	)	
22	)	

23 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Nichole Lynn Beard and  
 24 Defendant United States of America hereby stipulate to dismiss with prejudice the above-captioned  
 25 action, including all claims that were or could have been asserted therein. Each party will bear its own  
 26 costs and attorney's fees.

27 //  
 28 //

STIPULATION OF DISMISSAL WITH PREJUDICE  
 C 17-3218 JCS

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: 04 / 10 / 2019

Respectfully submitted,



ALBERT G. STOLL, JR., ESQ.  
Attorney for Plaintiff

DAVID L. ANDERSON  
United States Attorney

DATED: 4/29/19



NEILL T. TSENG  
Assistant United States Attorney  
Attorneys for Defendant

Dated: April 30, 2019

