1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	ALLACCESS LAW GROUP Irene Karbelashvili, State Bar Number 232223 irene@allaccesslawgroup.com Irakli Karbelashvili, State Bar Number 302971 irakli@allaccesslawgroup.com 19 North Second Street, Suite 205 San Jose, CA 95113 Telephone: (408) 295-0137 Facsimile: (408) 295-0142  Attorneys for BRONYA TROSTENETSKY, Plaintiff  UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA  SAN FRANCISCO DIVISION  BRONYA TROSTENETSKY,  Plaintiff,  VS.  Plaintiff,  VS.  Case No. 3:17-cv-04167-RS  STIPULATION AND [PROPOSED] ORDER DISMISSING ACTION WITH PREJUDICE AND RETAINING JURISDICTION OVER THE SETTLEMENT AGREEMENT	
20	Defendants	
21		
22 23 24	IT IS HEREBY STIPULATED by and between Plaintiff BRONYA TROSTENETSKY ("Plaintiff") and Defendant THE KEYS CONDOMINIUM OWERS ASSOCIATION	
25	("Defendant")(collectively, the "Parties"), through undersigned their undersigned counsel, that	
26	that this action be dismissed with prejudice in its entirety. Each side is to bear her/its own	
27 28	attorneys' fees, costs, and litigation expenses. The Parties FURTHER STIPULATE and request	
	Page 1 of 3	CV 04167 DG

Case No. 3:17-CV-04167-RS Stipulation and [Proposed] Order

1	that the Court retain jurisdiction over enforcement of the terms of the settlement agreement		
2	which terms are conditioned upon future remediation.		
3	Respectfully submitted,		
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6			
7	Dated: January 21, 2019	ALLACCESS LAW GROUP	
8		By: /s/ Irakli Karbelashvili IRAKLI KARBELASHVILI, Attorney for	
9		Plaintiff BRONYA TROSTENETSKY	
10			
11			
12	Dated: January 22, 2019	HARTSUYKER, STRATMAN & WILLIAMS-ABREGO	
13			
14		By: <u>/s/ Robert M. Maltz</u> ROBERT M. MALTZ, Attorney for DEFENDANT	
15 16		THE KEYS CONDOMINIUM OWNERS ASSOCIATION	
17		1200 0 011 11 01 (	
18			
19	FILER'S ATTESTATION		
20	Pursuant to Local Rule 5-1, I hereby attest that on January 22, 2019, I, received the		
21	concurrence of Robert M. Maltz, Esq. in the	ne ming of this document	
22		By:/s/ Irakli Karbelashvili	
23		IRAKLI KARBELASHVILI	
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## [PROPOSED] ORDED

Having reviewed the above stipulation, and for good cause shown, this action is dismissed with prejudice with each side bearing her/its own attorneys' fees, costs, and litigation expenses. The Court retains jurisdiction over the parties' settlement agreement.

Dated: <u>1/23/19</u>

United States District Judge