

PERRY, JOHNSON, ANDERSON,
MILLER & MOSKOWITZ LLP

1 Leslie R. Perry, Bar No. 062390
 2 Michael G. Miller, Bar No. 136491
 3 Nicole M. Jaffee, Bar No. 255944
 4 PERRY, JOHNSON, ANDERSON,
 5 MILLER & MOSKOWITZ, LLP
 6 438 1st Street, 4th Floor
 7 Santa Rosa, California 95401
 8 Telephone: (707) 525-8800
 9 Facsimile: (707) 545-8242
 10 Email: Perry@perryllaw.net
 11 Miller@perryllaw.net

12 Attorneys for Defendants/Cross-
 13 Claimants/Cross- Defendants
 14 MAUREEN B. COLLISS, an individual,
 15 MAUREEN B. COLLISS, TRUSTEE OF
 16 THE MAUREEN B. COLLISS 2000
 17 TRUST, JOSEPH COLLISS aka JOE
 18 COLLISS, an individual

19 UNITED STATES DISTRICT COURT
 20 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO

21 CHIN S. YANG, an individual, and LI-
 22 HUA C. YANG, an individual,

Case No. 3:17-cv-6658-RS

23 Plaintiffs,

**JOINT STIPULATION FOR
 DISMISSAL AND ~~[PROPOSED]~~
 ORDER**

24 v.

25 MAUREEN B. COLLISS, an individual,
 26 MAUREEN B. COLLISS, TRUSTEE OF
 27 THE MAUREEN B. COLLISS 2000
 28 TRUST, JOSEPH COLLISS aka JOE
 COLLISS, an individual, and SONOMA
 COUNTY AGRICULTURAL
 PRESERVATION AND OPEN SPACE
 DISTRICT, a California public agency,

Defendants.

AND RELATED CROSS-CLAIMS

WHEREAS, plaintiffs Chin S. Yang and Li-Hua C. Yang (hereinafter “the Yang Parties”) filed their First Amended Complaint against defendants Maureen B. Colliss, Maureen B. Colliss, Trustee of the Maureen B. Colliss 2000 Trust, Joseph Colliss aka Joe Colliss

1 (hereinafter “the Colliss Parties”) and Sonoma County Agricultural Preservation and Open
2 Space District, a California public agency (hereinafter “the District”) on November 21, 2017;
3 the Colliss Parties filed counterclaims against the Yang Parties and crossclaims against the
4 District on January 9, 2018; the District filed counterclaims against the Colliss Parties and
5 crossclaims against the Yang Parties on January 30, 2018 and the Yang Parties filed
6 counterclaims against the Colliss Parties on February 1, 2018 and counterclaims against the
7 District on February 12, 2018;

8 WHEREAS, the Yang Parties, the Colliss Parties and the District settled this matter on
9 or about February 26, 2019;

10 THEREFORE, IT IS HEREBY STIPULATED by and between the Yang Parties, the
11 Colliss Parties and the District through their designated counsel that the above-captioned
12 action should be dismissed with prejudice pursuant to Federal Rule of Civil Procedure
13 41(a)(1)(A)(i). The parties further stipulate that, except as set forth in the Settlement
14 Agreement between them, the parties shall bear their own attorney’s fees, expenses and costs.

15 By signing this Joint Stipulation for Dismissal and [Proposed] Order, the counsel for
16 each party listed below concurs in its filing. This document is being filed through the
17 Electronic Case Filing system by attorney Nicole M. Jaffee. By her signature, she attests that
18 the Colliss Parties have obtained concurrence in the filing of this document from each counsel
19 signing the stipulation, pursuant to Civil Local Rule 5-1.

20 IT IS SO STIPULATED.

21 DATED: March 14, 2019

22 MERLIN LAW GROUP

BRUCE D. GOLDSTEIN, COUNTY
COUNSEL

23 /s/ Victor Jacobellis

/s/ Michael A. King

24 VICTOR JACOBELLIS
25 Attorneys for Plaintiffs/Cross-
26 Claimants/Cross-Defendants
27 CHIN S. YANG, an individual, and LI-
28 HUA C. YANG, an individual

MICHAEL A. KING
Deputy County Counsel
Attorneys for Defendant/Cross-
Claimant/Cross-Defendant
SONOMA COUNTY AGRICULTURAL
PRESERVATION AND OPEN SPACE
DISTRICT

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

PERRY, JOHNSON, ANDERSON,
MILLER & MOSKOWITZ, LLP

/s/ Nicole M. Jaffee
LESLIE R. PERRY
MICHAEL G. MILLER
NICOLE M. JAFFEE
Attorneys for Defendants/Cross-
Claimants/Cross-Defendants
MAUREEN B. COLLISS, an individual,
MAUREEN B. COLLISS, TRUSTEE OF
THE MAUREEN B. COLLISS 2000
TRUST, JOSEPH COLLISS aka JOE
COLLISS. an individual

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

ORDER

The Court having considered the stipulation of the parties, orders as follows:

1. The action is dismissed with prejudice as against Defendants/Cross-Defendants/Counter-Defendants MAUREEN B. COLLISS, an individual, MAUREEN B. COLLISS, TRUSTEE OF THE MAUREEN B. COLLISS 2000 TRUST, JOSEPH COLLISS aka JOE COLLISS, an individual; and Defendant/Cross-Defendant/Counter-Defendant SONOMA COUNTY AGRICULTURAL PRESERVATION AND OPEN SPACE DISTRICT; and Cross-Defendants/Counter-Defendants CHIN S. YANG, an individual, and LI-HUA C. YANG, an individual, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i).
2. Each party shall bear their own attorney's fees, costs and expenses.
3. The Court shall retain jurisdiction over this matter to enforce the terms of the February 26, 2019 Settlement Agreement.

IT IS SO ORDERED.

DATED: March 15, 2019


UNITED STATES DISTRICT COURT JUDGE
RICHARD SEEBORG