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17 Attorneys for Defendants
 18 METROPOLITAN TRANSPORTATION
 19 COMMISSION and CITY AND
 20 COUNTY OF SAN FRANCISCO

21 UNITED STATES DISTRICT COURT
 22 FOR THE NORTHERN DISTRICT OF CALIFORNIA

23 JOHN SCHULZ,

24 Plaintiff,

25 v.

26 METROPOLITAN TRANSPORTATION
 27 COMMISSION; and CITY AND COUNTY OF
 28 SAN FRANCISCO

Defendants.

Case No. 3:19-cv-02134-MMC

Civil Rights

**STIPULATION AND [PROPOSED]
 ORDER DISMISSING ENTIRE ACTION
 WITH PREJUDICE**

STIPULATION

Plaintiff JOHN SCHULZ (“Plaintiff”) and Defendants METROPOLITAN TRANSPORTATION COMMISSION; and CITY AND COUNTY OF SAN FRANCISCO (“Defendants”) – Plaintiff and Defendants together the “Parties” – hereby stipulate and request that pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(ii), the above-captioned action be dismissed with prejudice in its entirety. Each side shall pay its own attorneys' fees and costs,

1 except as expressly set forth in a Settlement Agreement between the parties.

2 In accordance with Paragraph 9 of General Order 56, the Parties request that the Court
3 retain jurisdiction to enforce the injunctive relief measures specified in Exhibit A attached hereto.

4 **IT IS SO STIPULATED.**

5 Dated: April 26, 2021

REIN & CLEFTON

/s/ Aaron M. Clefton

6 By: AARON M. CLEFTON, ESQ.

7 Attorneys for Plaintiff

JOHN SCHULZ

9 Dated: April 26, 2021

FOLGER LEVIN LLP

/s/ Jiyun Cameron Lee

10 By: JIYUN CAMERON LEE, ESQ.

11 Attorneys for Defendants

METROPOLITAN TRANSPORTATION

12 COMMISSION and CITY AND

COUNTY OF SAN FRANCISCO

13 **FILER'S ATTESTATION**

14 Pursuant to Local Rule 5-1, I hereby attest that on April 26, 2021, I, Aaron Clefton,
15 attorney with Rein & Clefton, received the concurrence of Jiyun Cameron Lee, counsel for
16 Defendants, in the filing of this document.

/s/ Aaron M. Clefton

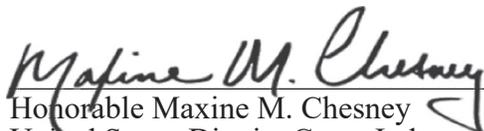
17 Aaron M. Clefton

18
19 **[PROPOSED] ORDER**

20 Pursuant to the stipulation of the parties, and for good cause shown, IT IS SO ORDERED.
21 Defendants shall perform the work specified in Exhibit A. The Court shall retain jurisdiction to
22 enforce the work contemplated to be done in Exhibit A and the Parties' separate Settlement
23 Agreement as to monetary terms.

24 **IT IS SO ORDERED.**

25
26 Dated: June 7, 2021


27 Honorable Maxine M. Chesney
28 United States District Court Judge