

ALLEN, GLAESSNER, HAZELWOOD & WERTH, LLP
180 Montgomery Street, Suite 1200
San Francisco, California 94104

1 DALE L. ALLEN, JR., SBN 145279
dallen@aghwlaw.com
2 KEVIN P. ALLEN, SBN 252290
kallen@aghwlaw.com
3 ALLEN, GLAESSNER, HAZELWOOD &
WERTH, LLP
4 180 Montgomery Street, Suite 1200
San Francisco, CA 94104
5 Telephone: (415) 697-2000
Facsimile: (415) 813-2045
6

7 Attorneys for Defendants
TOWN OF YOUNTVILLE, COUNTY OF NAPA,
8 NAPA COUNTY SHERIFF DEPARTMENT,
NAPA COUNTY SHERIFF DEPUTY RAQUEL
9 HURLBUT, NAPA COUNTY SHERIFF DEPUTY
MICHAEL CREAN, NAPA COUNTY SHERIFF
10 STEPHEN TONG, NAPA COUNTY SHERIFF
SGT. WILLIAM DJERNES, NAPA COUNTY
SHERIFF SGT. DAVID ACKMAN
11

12 DAVID M. HELBRAUN SBN 129840
HELBRAUN LAW FIRM
555 Montgomery Street, Suite 605
13 San Francisco, CA 94111
Phone: (415) 982-4000
14 dmh@helbraunlaw.com

15 Attorneys for Plaintiff
PETER LAUBER
16

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA

19 PETER LAUBER,
Plaintiff,

20 v.

21 TOWN OF YOUNTVILLE,
YOUNTVILLE POLICE DEPARTMENT,
22 COUNTY OF NAPA, NAPA COUNTY
SHERIFF DEPARTMENT, NAPA
23 COUNTY SHERIFF DEPUTY RAQUEL
HURLBUT, NAPA COUNTY SHERIFF
24 DEPUTY MICHAEL CREAN, NAPA
COUNTY SHERIFF DEPUTY STEOHEN
25 TONG, NAPA COUNTY SHERIFF SGT.
WILLIAM DJERNES, NAPA COUNTY
26 SHERIFF SGT. DAVID ACKMAN, and
DOES 1-25,
27 Defendants.

Case No. 3:22-cv-01163-JCS

STIPULATION FOR DISMISSAL

Hon. Joseph Spero

1 **IT IS HEREBY STIPULATED AND AGREED** by PETER LAUBER (“Plaintiff”) and
2 TOWN OF YOUNTVILLE, COUNTY OF NAPA, NAPA COUNTY SHERIFF
3 DEPARTMENT, NAPA COUNTY SHERIFF DEPUTY RAQUEL HURLBUT, NAPA
4 COUNTY SHERIFF DEPUTY MICHAEL CREAN, NAPA COUNTY SHERIFF STEPHEN
5 TONG, NAPA COUNTY SHERIFF SGT. WILLIAM DJERNES, NAPA COUNTY SHERIFF
6 SGT. DAVID ACKMAN (“Defendants”), by and through their attorneys, that the above-
7 captioned action is dismissed with prejudice as to all causes of action and all defendant(s), with
8 each side to bear their own costs and attorneys’ fees. This stipulation is made pursuant to Federal
9 Rule of Civil Procedure 41(a)(1)(A)(ii); no Court order is required to dismiss.

ALLEN, GLAESSNER, HAZELWOOD & WERTH, LLP
180 Montgomery Street, Suite 1200
San Francisco, California 94104

10 Respectfully submitted,

11 ALLEN GLAESSNER HAZELWOOD
12 WERTH

13 DATED: January 18, 2023

14 By: /s/ Kevin P. Allen
15 DALE L. ALLEN, JR.
16 KEVIN P. ALLEN

17 Attorneys for Defendants
18 TOWN OF YOUNTVILLE, COUNTY OF
19 NAPA, NAPA COUNTY SHERIFF
20 DEPARTMENT, NAPA COUNTY SHERIFF
21 DEPUTY RAQUEL HURLBUT, NAPA
22 COUNTY SHERIFF DEPUTY MICHAEL
23 CREAN, NAPA COUNTY SHERIFF
24 STEPHEN TONG, NAPA COUNTY
25 SHERIFF SGT. WILLIAM DJERNES, NAPA
26 COUNTY SHERIFF SGT. DAVID ACKMAN

27 HELBRAUN LAW FIRM

28 DATED: January 18, 2023

By: /s/ David Helbaun
DAVID HELBRAUN
Attorneys for Plaintiff
PETER LAUBER

Dated: January 19, 2023

