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THE JAFFE LAW FIRM
Stephen R. Jaffe (CA SBN 49539)
101 California Street, Ste. 2710
San Francisco, California 94111
Telephone: (415) 618-0100
Facsimile: (415) 618-0080
Email: Stephen.R.Jaffe@JaffeTrialLaw.com

GOMBOS LEYTON, P.C.
Steven M. Gombos (VA SBN 30788)
(admitted *pro hac vice*; *lead counsel*)
11350 Random Hills Road, Suite 400
Fairfax, Virginia 22030
Telephone: (703) 934-2660
Facsimile: (703) 934-9840
Email: SGombos@glpclaw.com

**WAGSTAFFE, VON LOEWENFELDT,
BUSCH & RADWICK LLP**
JAMES M. WAGSTAFFE (95535)
wagstaffe@wvbrlaw.com
MICHAEL VON LOEWENFELDT (178665)
mvl@wvbrlaw.com
100 Pine Street, Suite 2250
San Francisco, CA 94111
Telephone: (415) 357-8900
Fax: (415) 357-8910

**LAW OFFICES OF LELAND B.
ALTSCHULER**
Leland B. Altschuler (CA SBN 81459)
2995 Woodside Road, Suite 350
Woodside, CA 94062
Telephone: (650) 328-7917
Facsimile: (650) 989-4200
Email: Lee@AltschulerLaw.com

Attorneys for Relators Scott Rose, Mary
Aquino, Mitchell Nelson, and Lucy Stearns

ATTORNEYS FOR: Defendant Stephens
Institute d/b/a Academy of Art
University

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

UNITED STATES OF AMERICA, ex rel.
SCOTT ROSE, MARY AQUINO, MITCHELL
NELSON AND LUCY STEARNS,

Plaintiffs/Relators,

v.

STEPHENS INSTITUTE, a California
corporation, doing business as ACADEMY OF
ART UNIVERSITY, and DOES 1 through 50,
inclusive,

Defendants.

Case No. 4:09-cv-05966-PJH

**STIPULATION OF DISMISSAL WITH
PREJUDICE PURSUANT TO
SETTLEMENT AGREEMENT AND
FRCP 41 AND ORDER**

Judge: Hon. Phyllis Hamilton
Location: Courtroom 3, 3rd Floor

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TO THE COURT AND ALL PARTIES OF RECORD:

The parties have entered into a settlement agreement resolving all claims in this action. Pursuant to Federal Rule of Civil Procedure 41(a)(1), and in accordance with and subject to the terms of the settlement agreement, the parties stipulate that this action be dismissed with prejudice. The Parties intend this dismissal to constitute a full and final judgment in this action.

The Parties have been informed that counsel for the United States of America will be filing a consent to this dismissal.

The parties further stipulate that this Court should retain jurisdiction exclusively to enforce the settlement agreement.

IT IS SO STIPULATED.

Dated: November 5, 2021

THE JAFFE LAW FIRM

/s/ Stephen Jaffe
By: Stephen Jaffe

Dated: November 5, 2021

**WAGSTAFFE, VON LOEWENFELDT,
BUSCH & RADWICK LLP**

/s/ James Wagstaffe
By: James Wagstaffe

Attorneys for Plaintiffs/Relators Scott Rose,
Mary Aquino, Mitchell Nelson, and Lucy
Stearns

Dated: November 5, 2021

GOMBOS LEYTON, P.C.

/s/ Steven M. Gombos
By: Steven M. Gombos (admitted pro hac
vice)

Attorneys for Defendant Stephens Institute
d/b/a Academy of Art University

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SIGNATURE ATTESTATION

I hereby attest that all signatories listed above, on whose behalf this stipulation is submitted, concur in the filing’s content and have authorized the filing.

Dated: November 5, 2021

**WAGSTAFFE, VON LOEWENFELDT,
BUSCH & RADWICK LLP**

/s/ James Wagstaffe
By: James Wagstaffe

Attorneys for Plaintiffs/Relators Scott Rose,
Mary Aquino, Mitchell Nelson, and Lucy
Stearns

