

1 THOMAS E. FRANKOVICH (State Bar #074414)
 THOMAS E. FRANKOVICH
 2 *A PROFESSIONAL LAW CORPORATION*
 4328 Redwood Hwy, Suite 300
 3 San Rafael, CA 94903
 Telephone: 415/674-8600
 4 Facsimile: 415/674-9900

5 Attorneys for Plaintiff IRMA RAMIREZ

6 UNITED STATES DISTRICT COURT
 7 NORTHERN DISTRICT OF CALIFORNIA
 8

9 IRMA RAMIREZ, an individual)
 10)
 11 Plaintiffs,)
 12 v.)
 13 BILINGUAL BROADCASTING)
 14 FOUNDATION, INC., a California)
 15 Corporation dba KBBF 89.1 FM RADIO)
 16 ,)
 17 Defendants.)
 18)
 19 _____)

CASE NO. CV-10-3145-LB

STIPULATION OF DISMISSAL AND
~~PROPOSED~~ ORDER THEREON

20 The parties, by and through their respective counsel, stipulate to dismissal of this action
 21 in its entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(1). Outside of the terms of the
 22 Settlement Agreement and General Release (“Agreement”) herein, each party is to bear its own
 23 costs and attorneys’ fees. The parties further consent to and request that the Court retain
 24 jurisdiction over enforcement of the Agreement. *See Kokonen v. Guardian Life Ins. Co.*, 511
 25 U.S. 375 (1994) (empowering the district courts to retain jurisdiction over enforcement of
 26 settlement agreements).

27 ///
 28 ///

1 Therefore, IT IS HEREBY STIPULATED by and between parties to this action through
2 their designated counsel that the above-captioned action be and hereby is dismissed with
3 prejudice pursuant to Federal Rules of Civil Procedure section 41(a)(1).

4 This stipulation may be executed in counterparts, all of which together shall constitute
5 one original document.

6
7 Dated: November 14, 2011

THOMAS E. FRANKOVICH
A PROFESSIONAL LAW CORPORATION

8
9
10 By: /s/ Thomas E. Frankovich
Thomas E. Frankovich
Attorney for Plaintiff IRMA RAMIREZ

11
12
13 Dated: _____, 2011

LAW OFFICES OF NANCY A. PALANDATI

14
15 By: _____
Nancy A. Palandati

16
17 Attorney for Defendant's BILINGUAL
18 BROADCASTING FOUNDATION, INC., a
California Corporation dba KBBF 89.1 FM RADIO

19
20 **ORDER**

21 IT IS HEREBY ORDERED that this matter is dismissed with prejudice pursuant to
22 Fed.R.Civ.P.41(a)(1). IT IS FURTHER ORDERED that the Court shall retain jurisdiction for
23 the purpose of enforcing the parties' Settlement Agreement and General Release should such
24 enforcement be necessary

25 Dated: _____, 2011

26
27 _____
Honorable Judge Laurel Beeler
28 UNITED STATE DISTRICT JUDGE

1 Therefore, IT IS HEREBY STIPULATED by and between parties to this action through
2 their designated counsel that the above-captioned action be and hereby is dismissed with
3 prejudice pursuant to Federal Rules of Civil Procedure section 41(a)(1).

4 This stipulation may be executed in counterparts, all of which together shall constitute
5 one original document.

6
7 Dated: November 14, 2011

THOMAS E. FRANKOVICH
A PROFESSIONAL LAW CORPORATION

8
9
10 By: _____
11 Thomas E. Frankovich
12 Attorney for Plaintiff IRMA RAMIREZ

13 Dated: 11/14, 2011

LAW OFFICES OF NANCY A. PALANDATI

14
15 By: 
16 Nancy A. Palandati

17 Attorney for Defendant's BILINGUAL
18 BROADCASTING FOUNDATION, INC., a
19 California Corporation dba KBBF 89.1 FM RADIO

20 ORDER

21 IT IS HEREBY ORDERED that this matter is dismissed with prejudice pursuant to
22 Fed.R.Civ.P.41(a)(1). IT IS FURTHER ORDERED that the Court shall retain jurisdiction for
23 the purpose of enforcing the parties' Settlement Agreement and General Release should such
24 enforcement be necessary **The November 17, 2011 status conference is VACATED.**

25 Dated: November 14, 2011

26
27 
28 Honorable Judge Laurel Beeler
UNITED STATE DISTRICT JUDGE