Thomas P. Riley, SBN 194706 LAW OFFICES OF THOMAS P. RILEY, P.C. First Library Square 1114 Fremont Avenue South Pasadena, CA 91030-3227

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Attorneys for Plaintiff Joe Hand Promotions, Inc.

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

Joe Hand Promotions, Inc.,

Rodolfo Delgadillo,

CASE NO. 4:11-cv-04594-YGR

Plaintiff.

vs.

PLAINTIFF'S COMPLAINT AGAINST DEFENDANT RODOLFO DELGADILLO, individually and d/b/a

STIPULATION OF DISMISSAL OF

TAQUERIA AGUILILLA

AND ORDER

Defendant.

IT IS HEREBY STIPULATED by and between Plaintiff JOE HAND PROMOTIONS, INC. and Defendant RODOLFO DELGADILLO, individually and d/b/a TAQUERIA AGUILILLA, that the above-entitled action is hereby dismissed without prejudice against RODOLFO DELGADILLO, individually and d/b/a TAQUERIA AGUILILLA and subject to the Court's jurisdiction to enforce the settlement agreement reached between the Parties.

IT IS FURTHER STIPULATED that provided no Party referenced above has filed a motion to reopen this action by January 23, 2014, the dismissal shall be deemed to be with prejudice.

STIPULATION OF DISMISSAL Case No. 4:11-cv-04594-YGR PAGE 1 This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1). Each Party referenced-above shall bear its own attorneys' fees and costs.

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Dated: December 20, 2012

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LAW OFFICES OF THOMAS P. RILEY, P.C.

By: Thomas P. Riley, Esquire

Attorneys for Plaintiff

JOE HAND PROMOTIONS INC.

LAW OFFICE OF GREGORY O. SLATOFF

By: Gregory O. Slatoff, Esquire

Attorneys for Defendant

RODOLFO DELGADILLO, individually and d/b/a

TAQUERIA AGUILLA

IT IS SO ORDERED:

The Honorable Yvonne Gonzalez Rogers

United States District Court

Northern District of California

Dated: February 15, 2013

STIPULATION OF DISMISSAL Case No. 4:11-ev-04594-YGR PAGE 2

## **PROOF OF SERVICE (SERVICE BY MAIL)**

I declare that:

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I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On December 20, 2012, I served:

## STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT AGAINST DEFENDANT RODOLFO DELGADILLO, individually and d/b/a TAQUERIA AGUILILLA

On all parties in said cause by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Mr. Gregory Oakles Slatoff, Esquire LAW OFFICE OF GREGORY O. SLATOFF 225 W. Winton Ave, Suite 205 Hayward, CA 94544

(Attorneys for Defendant)

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on December 20, 2012, at South Pasadena, California.

Dated: December 20, 2012

MARIA BAIRD

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STIPULATION OF DISMISSAL Case No. 4:11-cv-04594-YGR PAGE 3