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8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 OAKLAND DIVISION

12 RUTH HERRERA,
 13 Plaintiff,
 14 v.
 15 TIFFANY AND COMPANY and DOES 1-
 16 50, inclusive,
 17 Defendants.

Case No. 4:11-cv-05201-PJH

**STIPULATION OF DISMISSAL WITH
 PREJUDICE AND [PROPOSED] ORDER**

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 19 WHEREAS, Plaintiff Ruth Herrera (“Plaintiff”) filed a lawsuit in Monterey County
 20 Superior Court on August 26, 2011, against Tiffany and Company (“Defendant”) in which she
 21 alleged Defendant engaged in wrongful conduct in connection with her employment with Tiffany
 22 and Company and the termination of her employment;

23 WHEREAS Defendant denied engaging in any inappropriate, wrongful, or unlawful
 24 conduct toward Plaintiff or any other individual and removed the action to the United States District
 25 Court, Stipulation of Dismissal and Proposed Order Northern District of California, on or about
 26 October 24, 2011;

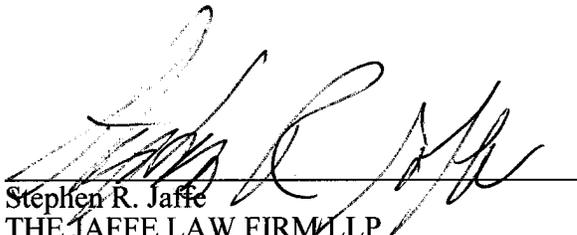
27 WHEREAS, Plaintiff and Defendant settled the matter on or about May 21, 2012,
 28

1 which has been memorialized in a Confidential Settlement Agreement and General Release of All
2 Claims ("Settlement Agreement");

3 THEREFORE, IT IS STIPULATED by and between Plaintiff and Defendant through
4 their designated counsel that the above-captioned action should be dismissed as to Defendant with
5 prejudice pursuant to FRCP 41. There are no claims remaining in the case. The parties further
6 stipulate that, except as set forth in the Settlement Agreement between them, the parties shall bear
7 their own attorney's fees, expenses and costs.

8 IT IS SO STIPULATED.

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10 Dated: June 28, 2012


Stephen R. Jaffe
THE JAFFE LAW FIRM LLP
Attorneys for Plaintiff
RUTH HERRERA

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15 Dated: ~~June~~ ^{July} 3, 2012


Christopher E. Cobey
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A Professional Corporation
Attorneys for Defendant
TIFFANY AND COMPANY

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ORDER

The Court having considered the stipulation of the parties, and good cause appearing therefor, orders as follows:

1. The action is dismissed with prejudice against Defendant. There are no claims remaining in the case.
2. Except as set forth in the Settlement Agreement between the parties, each party shall bear their own costs and attorneys' fees.
3. The Court shall retain jurisdiction over this matter to enforce the terms of the Settlement Agreement.

Dated: July 3, 2012

Firmwide: 112438502.1 063346.1003

The Honorable Phyllis J. Hamilton
United States District Court
Northern District of California

