



1 Notice of Removal of the Action Under 28 U.S.C §1441(b) – Diversity;

2 **WHEREAS**, on July 3, 2013, T-Fal and Target filed an Answer to the  
3 Complaint of Plaintiff;

4 **WHEREAS**, the Plaintiff now wishes to dismiss Target without prejudice;

5 **WHEREAS**, on October 18, 2013, Plaintiff filed a Notice of Voluntary  
6 Dismissal of Target;

7 **WHEREAS**, the parties now file this stipulation of dismissal, signed by all  
8 parties;

9 **IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES:**

10 Pursuant to Federal Rules of Civil Procedure, Rule 49(a)(1)(A)(ii) Plaintiff's  
11 action as to Target shall be dismissed without prejudice.

12  
13 DATED: October 21, 2013

BULLIUNG & ASSOCIATES

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15 By: /s/ Gregory J. Bulliung  
16 Gregory J. Bulliung, Esq.  
17 Attorneys for Plaintiff,  
18 **Farris Adam**

19 DATED: October 21, 2013

CLINTON & CLINTON

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21 By: /s/ Dana M. Ulise  
22 DAVID A. CLINTON, ESQ.  
23 DANA M. ULISE, ESQ.  
24 Attorneys for Defendants,  
25 **T-FAL CORP. dba T-FAL USA**  
26 **and TARGET CORPORATION,**  
27 **improperly named as TARGET,**  
28 **INC.**

