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

12 WINERTHAN CHIU,) NO. C14-1607-JSW
 13 Plaintiff,)
 14 v.) STIPULATED REQUEST FOR
) CONDITIONAL DISMISSAL AND
 15 UNITED STATES OF AMERICA, et. al.,) ~~PROPOSED~~ ORDER
 16 Defendant.)
 17)

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19 It is hereby Stipulated and Agreed by the parties herein as follows:

- 20 1. The parties hereto, through their respective counsel, are advising this Court that they
 21 have agreed to a settlement of this action.
 22 2. The terms of the settlement involve consideration that will take between 60 to 90 days to
 23 deliver.
 24 3. Accordingly, the parties request that this action be dismissed with prejudice and that all
 25 dates be vacated provided, however, that if either party certifies to this Court, with a proof of service of
 26 a copy on opposing counsel, within 90 days from the date of the Order of Dismissal, that the agreed

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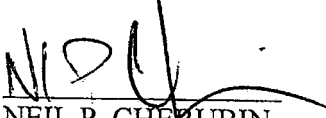
Stip Request For Conditional Dismissal &
~~proposed~~ Order; C-14-1607-JSW

1 consideration for the settlement has not been delivered over, that the Order of Dismissal shall stand
2 vacated, and the action be restored to the calendar to be set for a case management conference.

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4 SO STIPULATED

MELINDA HAAG
United States Attorney

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6 /s/ Cynthia Stier 
7 CYNTHIA STIER
8 Assistant United States Attorney

9 
10 NEIL P. CHERUBIN
11 Attorney for Winerthan Chiu

12 SO ORDERED this 27th day of October, 2014.

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15 JEFFREY S. WHITE
16 UNITED STATES DISTRICT JUDGE
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