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4 **LEONE & ALBERTS**

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6 2175 North California Blvd., Suite 900  
7 Walnut Creek, CA 94596  
8 Telephone: (925) 974-8600  
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10 Email: [leone@leonealberts.com](mailto:leone@leonealberts.com)  
11 [cleed@leonealberts.com](mailto:cleed@leonealberts.com)  
12 [sgordon@leonealberts.com](mailto:sgordon@leonealberts.com)

13 Attorneys for Defendants

14 BRENTWOOD UNION SCHOOL DISTRICT, LAURI JAMES, BRIAN JONES,  
15 JEAN ANTHONY, MARGO OLSON, MARGARET KRUSE, and MERRILL  
16 GRANT

17 MARK E. DAVIS, ESQ. (SBN: 079936)  
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20 1960 The Alameda, Suite 210  
21 San Jose, CA 95126  
22 Telephone: (408) 244-2166  
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26 Attorneys for Defendant, DINA HOLDER

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28 **LAW OFFICE OF TODD BOLEY**

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30 Alameda, CA 94501  
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35 IAN A. HANSEN, ESQ. (SBN: 255449)

36 **LAW OFFICES OF PETER ALFERT**

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2 Facsimile: (925) 279-3342  
3 E-Mail: peter@alfertlaw.com

4 Attorneys for PLAINTIFFS

5 UNITED STATES DISTRICT COURT  
6 NORTHERN DISTRICT OF CALIFORNIA

7 MICHAEL GAREDAKIS, TAMARA  
8 GAREDAKIS, and M.G., a minor by and  
9 through his guardian ad litem MICHAEL  
10 GAREDAKIS, YOLANDA JACKSON, and  
11 A.G., a minor by and through her guardian ad  
12 litem YOLANDA JACKSON, LAWRENCE  
13 GULLO, DANIELLE GULLO, and B.G., a  
14 minor by and through his guardian ad litem  
15 DANIELLE GULLO, KATHRYN  
16 MAGUIRE, and M.R., a minor by and  
17 through his guardian ad litem KATHRYN  
18 MAGUIRE, VIVIANA ROSE, and B.R., a  
19 minor by and through his guardian ad litem  
20 VIVIANA ROSE, AHMAD RAZAQI,  
21 DANIA RAZAQI and E.R., a minor by and  
22 through his guardian ad litem DANIA  
23 RAZAQI, a minor by and through his  
24 guardian ad litem,

25 Plaintiffs,

26 vs.

27 BRENTWOOD UNION SCHOOL  
28 DISTRICT,  
DINA HOLDER, LAURI JAMES, BRIAN  
JONES, JEAN ANTHONY, MARGO  
OLSON, MARGARET KRUSE, MERRILL  
GRANT and DOES 1-30,  
Defendants.

**Case No.: 4:14-cv-04799-PJH**

**STIPULATION AND ~~PROPOSED~~  
ORDER VACATING AND  
EXTINGUISHING ABSTRACT OF  
JUDGMENT**

Plaintiffs, on the one hand, and Brentwood Union School District hereby stipulate by and through their undersigned counsel of record as follows:

1 WHEREAS, on July 13, 2017, the United States District Court for Northern  
2 District of California issued an order awarding Defendants Brentwood Union School  
3 District, Lauri James, Brian Jones, Jean Anthony, Margo Olson, Margaret Kruse, and  
4 Merrill Grant (“Brentwood defendants”) attorney’s fees and costs in the amount of in the  
5 amount of \$578,854.20 in the above-referenced matter.

6 WHEREAS, on August 25, 2017, the United States District Court for Northern  
7 District of California issued an Abstract of Judgment in favor of Defendant and  
8 Judgment Creditor Brentwood Union School District for costs in the amount of  
9 \$578,854.20 in the above-referenced matter. A true and correct copy of which is  
10 attached hereto as Exhibit A.

11 WHEREAS, on August 29, 2017, a certified copy of the Abstract of Judgment  
12 was recorded in Contra Costa County, Instrument Number 20170157096. A true and  
13 correct copy of which is attached hereto as Exhibit B.

14 WHEREAS, on December 4, 2018, the United States Court of Appeals for the  
15 Ninth Circuit vacated the District Court’s July 13, 2017 order awarding attorney’s fees  
16 and costs to the Brentwood defendants.

17 Brentwood Union School District and Plaintiffs hereby stipulate and agree that  
18 the order that was the basis of the Abstract of Judgment issued by this Court on August  
19 25, 2019 and recorded by Contra Costa County (Instrument Number 20170157096) was  
20 vacated; that the Abstract of Judgment should be vacated and extinguished and removed  
21 from any and all property; and that the following debtors be fully released from the  
22 abstract of judgment.

23  
24 Michael Garedakis  
1383 Bryan Lane  
25 Gardnerville, NV 89410

Tamara Garedakis  
1383 Bryan Lane  
Gardnerville, NV 89410

26  
27 Lawrence Gullo  
1740 Diamond Springs Court  
28 Brentwood, CA 94513

Viviana Rose  
2625 Ranchwood Drive  
Brentwood, CA 94513

1 Danielle Gullo  
2 1740 Diamond Springs Court  
3 Brentwood, CA 94513

Ahmad Razaqi  
4541 Horseshoe Circle  
Antioch, CA 94531

4 Yolanda Jackson  
5 2400 Berkshire Lane  
6 Brentwood, CA 94513

Dania Razaqi  
4541 Horseshoe Circle  
Antioch, CA 94531

7  
8 The parties agree that Plaintiffs will record this order vacating the judgment in  
9 Contra Costa County.

10 IT IS SO STIPULATED.

11 Dated: September 10, 2019

**LEONE & ALBERTS**

12  
13 /s/ Louis A. Leone

14 LOUIS A. LEONE, ESQ.  
15 CLAUDIA LEED, ESQ.  
16 SETH GORDON, ESQ.  
17 Attorney for Defendants  
18 BRENTWOOD UNION SCHOOL DISTRICT,  
19 LAURI JAMES, BRIAN JONES, JEAN ANTHONY,  
20 MARGO OLSON, MARGARET KRUSE, and  
21 MERRILL GRANT

22 Dated: September 10, 2019

**LAW OFFICE OF TODD BOLEY**

23 /s/ Todd Boley

24 TODD BOLEY, ESQ.  
25 Attorney for Plaintiffs

26 Dated: September 10, 2019

**LAW OFFICES OF PETER ALFERT**

27 /s/ Peter Alfert

28 PETER ALFERT, ESQ.  
Attorney for Plaintiffs

1  
2 **PROPOSED ORDER**

3 Pursuant to the stipulation of the parties, and good cause appearing, it is hereby  
4 ordered as follows:

5 1. The order that was the basis of the Abstract of Judgment issued by this  
6 Court on August 25, 2019 and recorded by Contra Costa County (Instrument Number  
7 20170157096) was vacated;

8 2. The Abstract of Judgment issued by this Court on August 25, 2019 and  
9 recorded by Contra Costa County (Instrument Number 20170157096) should be  
10 vacated and extinguished and removed from any and all property;

11 3. The following debtors are hereby fully released from the abstract of  
12 judgment;

13 Michael Garedakis  
14 1383 Bryan Lane  
15 Gardnerville, NV 89410

Tamara Garedakis  
1383 Bryan Lane  
Gardnerville, NV 89410

16 Lawrence Gullo  
17 1740 Diamond Springs Court  
18 Brentwood, CA 94513

Viviana Rose  
2625 Ranchwood Drive  
Brentwood, CA 94513

19 Danielle Gullo  
20 1740 Diamond Springs Court  
21 Brentwood, CA 94513

Ahmad Razaqi  
4541 Horseshoe Circle  
Antioch, CA 94531

22 Yolanda Jackson  
23 2400 Berkshire Lane  
24 Brentwood, CA 94513

Dania Razaqi  
4541 Horseshoe Circle  
Antioch, CA 94531

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1 //

2 4. Plaintiffs will cause this order to be filed with the recorder's office and for  
3 the abstract of judgment to be removed from all of the above-listed debtors' property.

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5 **IT IS SO ORDERED:**

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7 Dated: October 3, 2019



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HON. PHYLLIS J. HAMILTON  
CHIEF DISTRICT JUDGE

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4837-0843-5105, v. 1

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# EXHIBIT A

|  |  |   |
|--|--|---|
| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address)  |  | PHONE NUMBER                                |
| <input checked="" type="checkbox"/> Recording requested by and return to:<br>Leone & Alberts – Louis Leone |  | (925) 974-8600                              |
| 2175 N. California Blvd., Suite 900  |  |   |
| Walnut Creek, CA 94596   |  |   |
| <input checked="" type="checkbox"/> ATTORNEY FOR   | <input checked="" type="checkbox"/> JUDGMENT CREDITOR  | <input type="checkbox"/> ASSIGNEE OF RECORD |
| NAME OF COURT:   | U.S. DISTRICT COURT<br>NORTHERN DISTRICT OF CALIFORNIA |   |
| STREET ADDRESS:  | 1301 Clay St # 400S                                    |   |
| MAILING ADDRESS:   |  |   |
| CITY, STATE, ZIP:  | Oakland, CA 94612                                      |   |
| PHONE NUMBER:  |  |   |

FOR RECORDER'S USE ONLY

|            |                                 |
|------------|---------------------------------|
| PLAINTIFF: | Michael Garedakis et al.        |
| DEFENDANT: | Brentwood Union School District |

**ABSTRACT OF JUDGEMENT**

Amended

CASE NUMBER:

**4:14-cv-04799-PJH**

1. The  judgment creditor  assignee of record applies for an abstract of judgment and represents the following:
- a. Judgment debtor's

Name and last known address

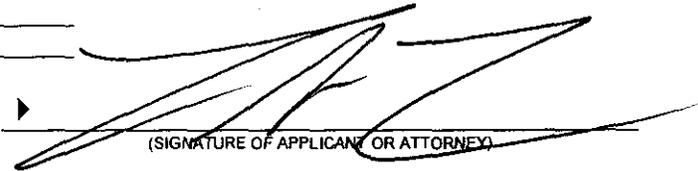
Michael Garedakis  
1383 Bryan Lane  
Gardnerville, NV 89410

FOR COURT USE ONLY

- b. Driver's license # and state:  Unknown
- c. Social Security #: REDACTED  Unknown
- d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):
- e.  Original abstract recorded in this county:
- (a) Date: \_\_\_\_\_
- (b) Instrument #: \_\_\_\_\_

- f.  Information on additional judgment debtors is shown on page two.

Date: Louis A. Leone  
(TYPE OR PRINT NAME)

  
(SIGNATURE OF APPLICANT OR ATTORNEY)

2. a.  I certify that the following is a true and correct abstract of the judgment entered in this action.
- b.  A certified copy of the judgment is attached.
3. Judgment creditor (name and address):  
Brentwood Union School District, c/o Leone & Alberts  
2175 N. California Blvd, Suite 900 Walnut Creek, CA94596
4. Judgment debtor (full name as it appears in judgment):
5. a. Judgment entered on (date): July 13, 2017
- b. Renewal entered on (date): \_\_\_\_\_

6. Total amount of judgment as entered or last renewed:  
\$578,854.20
7.  An  execution lien  attachment lien is endorsed on the judgment as follows:  
a.  Amount \$: \_\_\_\_\_  
b.  In favor of (name and address): \_\_\_\_\_
8. A stay of enforcement has:  
a.  not been ordered by the court  
b.  been ordered by the court effective until (date): \_\_\_\_\_
9.  This judgment is an installment judgment.

[SEAL]

This abstract issued on (date):  
**AUG 25 2017**

Clerk, by CYNTHIA LENAHAN, Deputy

|   |                           |
|---|---------------------------|
| PLAINTIFF: Michael Garedakis et al.<br>DEFENDANT: Brentwood Union School District | Case #: 4:14-cv-04799-PJH |
|---|---------------------------|

**INFORMATION ON ADDITIONAL JUDGMENT DEBTORS**

**10. Name and last known address**

Tamara Garedakis  
 1383 Bryan Lane  
 Gardnerville, NV 89410

Driver's license # and state: \_\_\_\_\_  Unknown  
 Social Security #: REDACTED  Unknown  
 Summons was personally served at or mailed to (address):  
 \_\_\_\_\_

**14. Name and last known address**

Vivana Rose  
 2625 Ranchwood Dr.  
 Brentwood, CA 94513

Driver's license # and state: \_\_\_\_\_  Unknown  
 Social Security #: \_\_\_\_\_  Unknown  
 Summons was personally served at or mailed to (address):  
 \_\_\_\_\_

**11. Name and last known address**

Lawrence Gullo  
 1740 Diamond Springs Ct.  
 Brentwood, CA 94513

Driver's license # and state: \_\_\_\_\_  Unknown  
 Social Security #: \_\_\_\_\_  Unknown  
 Summons was personally served at or mailed to (address):  
 \_\_\_\_\_

**15. Name and last known address**

Ahmad Razaqi  
 4541 Horseshoe Circle  
 Antioch, CA 94531

Driver's license # and state: REDACTED  Unknown  
 Social Security #: REDACTED  Unknown  
 Summons was personally served at or mailed to (address):  
 \_\_\_\_\_

**12. Name and last known address**

Danielle Gullo  
 1740 Diamond Springs Ct.  
 Brentwood, CA 94513

Driver's license # and state: REDACTED  Unknown  
 Social Security #: \_\_\_\_\_  Unknown  
 Summons was personally served at or mailed to (address):  
 \_\_\_\_\_

**16. Name and last known address**

Dania Razaqi  
 4541 Horseshoe Circle  
 Antioch, CA 94531

Driver's license # and state: \_\_\_\_\_  Unknown  
 Social Security #: REDACTED  Unknown  
 Summons was personally served at or mailed to (address):  
 \_\_\_\_\_

**13. Name and last known address**

Yolanda Jackson  
 2400 Berkshire Ln.  
 Brentwood, CA 94513

Driver's license # and state: REDACTED  Unknown  
 Social Security #: \_\_\_\_\_  Unknown  
 Summons was personally served at or mailed to (address):  
 \_\_\_\_\_

**17. Name and last known address**

\_\_\_\_\_

Driver's license # and state: \_\_\_\_\_  Unknown  
 Social Security #: \_\_\_\_\_  Unknown  
 Summons was personally served at or mailed to (address):  
 \_\_\_\_\_

18.  Continued on Attachment 18.

# EXHIBIT B

|  |  |   |
|--|--|---|
| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address)  |  | PHONE NUMBER                                |
| <input checked="" type="checkbox"/> Recording requested by and return to:<br>Leone & Alberts – Louis Leone |  | (925) 974-8600                              |
| 2175 N. California Blvd., Suite 900  |  |   |
| Walnut Creek, CA 94596   |  |   |
| <input checked="" type="checkbox"/> ATTORNEY FOR   | <input checked="" type="checkbox"/> JUDGMENT CREDITOR  | <input type="checkbox"/> ASSIGNEE OF RECORD |
| NAME OF COURT:   | U.S. DISTRICT COURT<br>NORTHERN DISTRICT OF CALIFORNIA |   |
| STREET ADDRESS:  | 1301 Clay St # 400S                                    |   |
| MAILING ADDRESS:   |  |   |
| CITY, STATE, ZIP:  | Oakland, CA 94612                                      |   |
| PHONE NUMBER:  |  |   |

copy/duplicate has not been compared to original document  
08/29/2017,20170157096

FOR RECORDER'S USE ONLY

|            |                                 |
|------------|---------------------------------|
| PLAINTIFF: | Michael Garedakis et al.        |
| DEFENDANT: | Brentwood Union School District |

**ABSTRACT OF JUDGEMENT**

Amended

CASE NUMBER:

**4:14-cv-04799-PJH**

1. The  judgment creditor  assignee of record applies for an abstract of judgment and represents the following:

FOR COURT USE ONLY

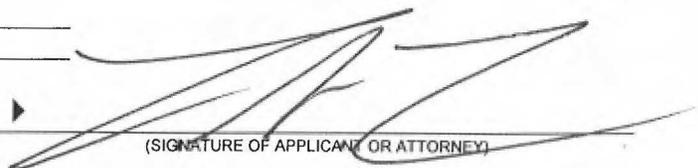
a. Judgment debtor's

| Name and last known address                                    |
|--|
| Michael Garedakis<br>1383 Bryan Lane<br>Gardnerville, NV 89410 |

- b. Driver's license # and state: \_\_\_\_\_  Unknown
- c. Social Security #: **REDACTED**  Unknown
- d. Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address): \_\_\_\_\_
- e.  Original abstract recorded in this county:
- (a) Date: \_\_\_\_\_
- (b) Instrument #: \_\_\_\_\_

- f.  Information on additional judgment debtors is shown on page two.

Date: Louis A. Leone  
(TYPE OR PRINT NAME)

  
(SIGNATURE OF APPLICANT OR ATTORNEY)

2. a.  I certify that the following is a true and correct abstract of the judgment entered in this action.
- b.  A certified copy of the judgment is attached.
3. Judgment creditor (name and address):  
Brentwood Union School District, c/o Leone & Alberts  
2175 N. California Blvd, Suite 900 Walnut Creek, CA94596
4. Judgment debtor (full name as it appears in judgment): \_\_\_\_\_
5. a. Judgment entered on (date): July 13, 2017
- b. Renewal entered on (date): \_\_\_\_\_

6. Total amount of judgment as entered or last renewed:  
\$578,854.20
7.  An  execution lien  attachment lien is endorsed on the judgment as follows:  
a.  Amount \$: \_\_\_\_\_  
b.  In favor of (name and address): \_\_\_\_\_
8. A stay of enforcement has:  
a.  not been ordered by the court  
b.  been ordered by the court effective until (date): \_\_\_\_\_
9.  This judgment is an installment judgment.

[SEAL]

This abstract issued on (date):  
**AUG 25 2017**

Clerk, by CYNTHIA LENAHAN, Deputy

|  |                           |
|--|---------------------------|
| PLAINTIFF: Michael Garedakis et al.        | Case #: 4:14-cv-04799-PJH |
| DEFENDANT: Brentwood Union School District |                           |

**INFORMATION ON ADDITIONAL JUDGMENT DEBTORS**

10. Name and last known address

Tamara Garedakis  
1383 Bryan Lane  
Gardnerville, NV 89410

Driver's license # and state: \_\_\_\_\_  Unknown

Social Security #: REDACTED  Unknown

Summons was personally served at or mailed to (address):

14. Name and last known address

Vivana Rose  
2625 Ranchwood Dr.  
Brentwood, CA 94513

Driver's license # and state: \_\_\_\_\_  Unknown

Social Security #: \_\_\_\_\_  Unknown

Summons was personally served at or mailed to (address):

11. Name and last known address

Lawrence Gullo  
1740 Diamond Springs Ct.  
Brentwood, CA 94513

Driver's license # and state: \_\_\_\_\_  Unknown

Social Security #: \_\_\_\_\_  Unknown

Summons was personally served at or mailed to (address):

15. Name and last known address

Ahmad Razaqi  
4541 Horseshoe Circle  
Antioch, CA 94531

Driver's license # and state: REDACTED  Unknown

Social Security #: REDACTED  Unknown

Summons was personally served at or mailed to (address):

12. Name and last known address

Danielle Gullo  
1740 Diamond Springs Ct.  
Brentwood, CA 94513

Driver's license # and state: REDACTED  Unknown

Social Security #: \_\_\_\_\_  Unknown

Summons was personally served at or mailed to (address):

16. Name and last known address

Dania Razaqi  
4541 Horseshoe Circle  
Antioch, CA 94531

Driver's license # and state: \_\_\_\_\_  Unknown

Social Security #: REDACTED  Unknown

Summons was personally served at or mailed to (address):

13. Name and last known address

Yolanda Jackson  
2400 Berkshire Ln.  
Brentwood, CA 94513

Driver's license # and state: REDACTED  Unknown

Social Security #: \_\_\_\_\_  Unknown

Summons was personally served at or mailed to (address):

17. Name and last known address

Driver's license # and state: \_\_\_\_\_  Unknown

Social Security #: \_\_\_\_\_  Unknown

Summons was personally served at or mailed to (address):

18.  Continued on Attachment 18.