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9 Attorney for Plaintiffs IRMA RAMIREZ
 10 and DAREN HEATHERLY

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**

12	IRMA RAMIREZ; and DAREN)	Case No. 4:15-cv-02282-KAW
13	HEATHERLY,)	
14)	STIPULATION OF DISMISSAL AND
15	Plaintiffs,)	[PROPOSED] ORDER THEREON
16	v.)	
17	GANESHA RESTAURANT, <i>et al.</i> ,)	
18	Defendants.)	
19)	

20
 21 The Parties, by and through their respective counsel, stipulate to the dismissal of this
 22 action in its entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(2).

23 IT IS HEREBY STIPULATED by and between the parties to this action through their
 24 designated counsel that the above-captioned action may be, and hereby is, dismissed with
 25 prejudice and that each side is to bear its own costs and attorneys' fees.

26 //
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 28 //

STIPULATION OF DISMISSAL AND [PROPOSED] ORDER

1 The parties further consent to and request that the Court retain jurisdiction over
2 enforcement of the Agreement. See Kokkonen v. Guardian Life Ins. Co. of Am., 511 U.S.
3 375, 381-82 (1994) (empowering the district courts to retain jurisdiction over enforcement of
4 settlement agreements).

5 Respectfully Submitted,

6 Dated: August 16, 2016

7 THOMAS E. FRANKOVICH, APLC
8 ***A PROFESSIONAL LAW CORPORATION***

9 By: /s/ Thomas E. Frankovich

10 Thomas E. Frankovich
11 Attorney for Plaintiffs

12 Dated: August 16, 2016

13 LAW OFFICES OF MICHAEL HEATH

14 By: /s/ Michael Heath

15 Michael Heath
16 Attorney for Defendants GEORGE CHANG and
17 JENNY CHANG

18 **[PROPOSED] ORDER**

19 IT IS HEREBY ORDERED that this matter is dismissed with prejudice pursuant to
20 Fed.R.Civ.P.41(a)(2) and that each side is to bear its own costs and attorneys' fees. IT IS
21 FURTHER ORDERED that the Court shall retain jurisdiction for the purpose of enforcing
22 the parties' Settlement Agreement and General Release should such enforcement become
23 necessary.

24 Dated: 8/30, 2016

25 
26 Hon. Kandis A. Westmore
27 UNITED STATES MAGISTRATE JUDGE
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